

2. Use of JUUL continues to grow rapidly. Notwithstanding months of negative press coverage surrounding JUUL in Summer 2019, sales of JUUL products grew 31.2% in the *four-week period* ending on September 21, 2019, alone.²

3. JUUL became the fastest startup ever to obtain a \$10 billion valuation, doing so four times faster than Facebook, when it achieved a \$15 billion valuation in October 2018.³ JUUL subsequently obtained a \$38 billion evaluation in December 2018.⁴ By February 2019, JUUL held a 75% share of the electronic cigarette market.⁵

4. The extraordinary proliferation of JUUL use in the United States is due in substantial part to two factors: (i) a patented chemical solution contained in JUULpods that allows for higher concentrations of nicotine than competing products, making JUULpods extremely addictive to users, and (ii) labeling and marketing practices that obfuscate the amount of nicotine contained in JUULpods.

5. This case specifically concerns JUUL's representations that its JUULpods are "5.0% nicotine strength" or "3.0% nicotine strength," which are featured prominently on the front of the packaging of JUULpods, as seen in the examples below.

² Jasmine Wu, *E-Cigarette Sales Slowing, Led by JUUL, amid Negative Headlines*, CNBC (Oct. 1, 2019), <https://www.cnbc.com/2019/10/01/e-cigarette-sales-slowing-led-by-juul-amid-negative-headlines.html>.

³ Don Reisinger, *JUUL Reached Its \$10 Billion Valuation 4 Times Faster Than Facebook*, Fortune (Oct. 10, 2019), <https://fortune.com/2018/10/10/juul-vaping-pen-valuation-vs-facebook/>.

⁴ Nitasha Tiku, *JUUL Sheds Its Anti-Smoking Cred and Embraces Big Tobacco*, Wired (Dec. 28, 2018), <https://www.wired.com/story/juul-sheds-anti-smoking-cred-embraces-big-tobacco/>.

⁵ Bonnie Herzog, Managing Director, Beverage, Household & Personal Care, Tobacco & C-Stores Research Wells Fargo Securities, LLC, Wall Street Tobacco Industry Update at NATO Education Seminar (Feb. 11, 2019), http://www.natocentral.org/uploads/Wall_Street_Update_Slide_Deck_February_2019.pdf.



6. Representations that JUULpods are “5.0% nicotine strength” or “3.0% nicotine strength” tend to lead reasonable consumers to believe that JUULpods contain low amounts of nicotine, and/or that JUULpods deliver only a fraction of the amount of nicotine delivered by combustible cigarettes.

7. In reality, JUULpods contain among the highest concentrations of nicotine of commercially-available electronic cigarette products. And a single “5.0% nicotine strength” JUULpod (which is available in packs of two or four) delivers as much or more nicotine than an entire pack of 20 combustible cigarettes.

8. JUULpods therefore contain and deliver high amounts of nicotine, which are comparable to or exceed the amount of nicotine delivered by combustible cigarettes.

9. Accordingly, JUUL tends to mislead reasonable consumers.

10. JUUL's omissions of and use of ambiguity as to material facts violate the District of Columbia Consumer Protection Procedures Act ("DC CPPA"), D.C. Code §§ 28-3901, *et seq.*

11. Because JUUL's labeling and marketing of JUULpods tends to deceive consumers about the amount of nicotine JUULpods contain, Breathe DC brings this unlawful trade practices case on behalf of itself and the general public, seeking relief that includes an injunction to stop the deceptive marketing and sale of JUULpods.

JURISDICTION AND VENUE

12. This Court has personal jurisdiction over the parties in this case.

13. This Court has personal jurisdiction over JUUL pursuant to D.C. Code § 13-423. JUUL has sufficient minimum contacts with the District of Columbia to establish personal jurisdiction of this Court over it because, *inter alia*, JUUL is engaged in deceptive schemes and acts directed at persons residing in, located in, or doing business in the District of Columbia, or otherwise purposefully avails itself of the laws of this District through its marketing and sales of JUULpods in this District.

14. This Court has subject matter jurisdiction over this action pursuant to D.C. Code §§ 28-3905(k)(1)(B), (k)(1)(C), (k)(1)(D), and (k)(2).

15. Venue is proper in this District under 28 U.S.C. § 1391(b). Substantial acts in furtherance of the alleged improper conduct, including the dissemination of misleading information regarding the nature and characteristics of JUULpods, occurred within this District. JUULpods are available for purchase at retail stores in the District of Columbia.

PARTIES

16. Plaintiff Breathe DC is a 501(c)(3) nonprofit organization headquartered in the District of Columbia that works to promote clean air and healthy breathing throughout the District, especially in communities affected by health disparities.

17. Breathe DC seeks to promote clean air and healthy breathing by providing free health education and smoking cessation services; advocating for stronger laws and policies to safeguard clean air and protect lungs from smoke, pollution, and chemicals; and counteracting deceptive and predatory practices by tobacco companies and similar actors.

18. Efforts undertaken by Breathe DC have included testifying before the D.C. Council on multiple occasions to speak to the importance of regulating the use of electronic nicotine delivery systems.

19. By commencing this action, Plaintiff Breathe DC is acting for the benefit of the general public as a private attorney general pursuant to D.C. Code § 28-3905(k)(1). Plaintiff Breathe DC is a non-profit organization pursuant to D.C. Code § 28-3901(a)(14) and a public-interest organization pursuant to D.C. Code § 28-3901(a)(15).

20. Defendant JUUL is a corporation incorporated under the laws of the State of Delaware, with its principal place of business in San Francisco, California.

21. JUUL is, and at all relevant times herein has been, engaged in commercial transactions throughout the District of Columbia.

22. JUUL produces and/or causes the production of JUULpods and markets and distributes them in retail stores in the District of Columbia and throughout the United States. JUUL also markets and sells JUULpods to consumers in the District of Columbia and throughout the United States via its website.

FACTUAL ALLEGATIONS

A. JUUL Represents That JUULpods Are “5.0% Nicotine Strength” or “3.0% Nicotine Strength.”

23. The JUUL ENDS consists of two basic components: the JUUL device and a JUULpod. The JUUL device is a compact, elongated aluminum shell that encases a lithium-ion battery, a circuit board constituting a temperature control system, and a pressure sensor. JUULpods are disposable, plastic cartridges pre-filled with JUUL’s proprietary liquids. JUULpods also contain a silica wick and a nichrome coil heater, as well as a stainless-steel pathway through which aerosol travels.

24. To use the JUUL ENDS, a consumer inserts a JUULpod into the JUUL device, and then creates pressure by sucking in air on the JUULpod, which serves as a mouthpiece for the JUUL device. As pressure is created, the heating system activates and the liquid in the JUULpod is converted into aerosol, which is then inhaled by the user.

25. JUUL’s product line currently includes the following JUULpod flavors:

- a. Virginia Tobacco;
- b. Classic Tobacco; and
- c. Menthol.

26. JUUL offers each JUULpod flavor in “5.0% nicotine strength” and “3.0% nicotine strength.”

27. As discussed above, JUUL includes the statements “5.0% nicotine strength” or “3.0% nicotine strength” on the front of the JUULpods’ packaging.

28. On the back of the packaging of “5.0% nicotine strength” JUULpods—in small, nondescript type—are the following statements: “1 JUULpod contains ~0.7 ml with 5% nicotine by weight. Approximately equivalent to about 1 pack of cigarettes.”

29. Percentage-by-weight is simply a measurement of weight. For example, percentage-by-weight measured using milligrams (mg), a unit of measurement of weight, can be expressed as mg / mg. In order to determine the amount of a substance in a solution based on the percentage-by-weight of that substance in the solution, one must know how much the entire solution weighs (*e.g.*, .05 = x mg / y mg).

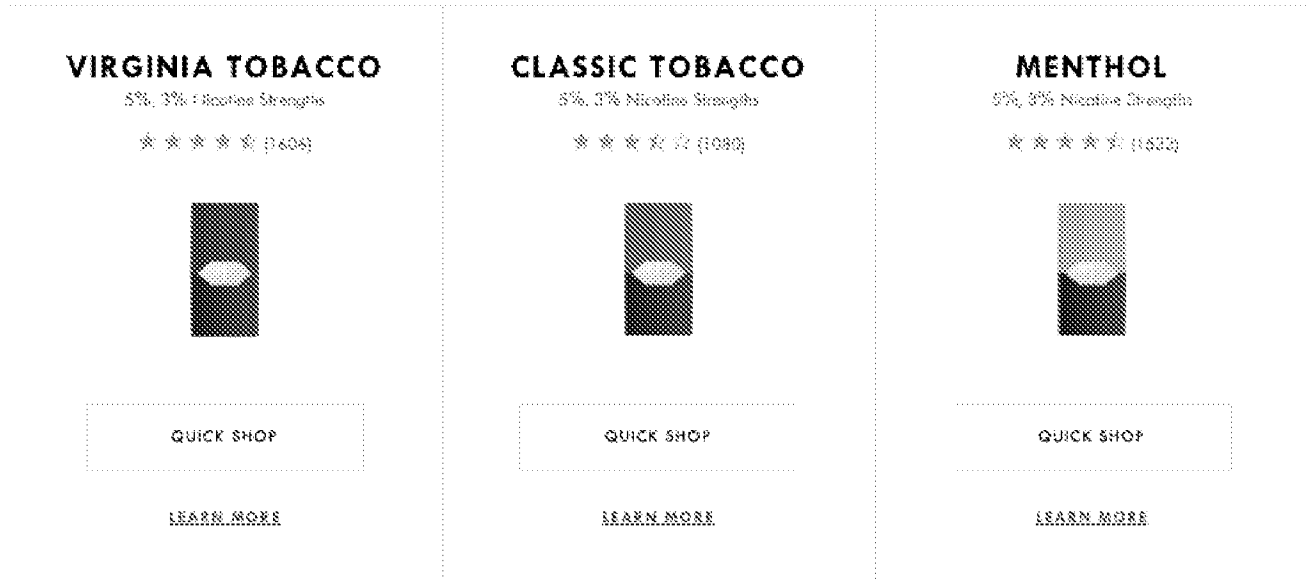
30. Meanwhile, milliliters (mL) are a unit of measurement of volume, or the amount of space that something occupies. One cannot determine what something, such as a solution, weighs based on the amount of space that the solution occupies.

31. Accordingly, one cannot determine the amount of nicotine contained in a JUULpod based on its percentage-by-weight of a solution (*e.g.*, measured in milligrams, .05 = mg / mg) and the amount of space that the solution occupies (~0.7 mL), which together are the only relevant information JUUL provides on the packaging of “5.0% nicotine strength” JUULpods, on either the back or front.

32. Upon information and belief, there are no statements on the back of the packaging of “3.0% nicotine strength” similar to “1 JUULpod contains ~0.7 ml with 5% nicotine by weight. Approximately equivalent to about 1 pack of cigarettes.”

33. In addition to including the representations “5.0% nicotine strength” and “3.0% nicotine strength” on the front of JUULpods’ packaging, JUUL makes similar representations throughout its website. Below is an example from the homepage of JUUL’s online store, from which residents of the District of Columbia can order JUUL products.⁶

⁶ *Shop*, JUUL, <https://www.juul.com/shop> (last visited Nov. 5, 2019).



34. On September 25, 2019, JUUL suspended all broadcast, print, and digital product advertising in the United States.⁷

35. Upon information and belief, the actual nicotine content of JUULpods (as reported by JUUL) is only available on one JUUL webpage, which is accessible only by linking through a section of JUUL’s “Support” webpage.⁸ According to this webpage, “[e]ach 5% JUULpod is manufactured to contain about 40mg of nicotine based on 59mg/mL” and “[e]ach 3% JUULpod is manufactured to contain about 23mg of nicotine based on 35mg/mL.”

B. The JUUL ENDS Delivers Extremely High Amounts of Nicotine to Users.

36. The central design innovation behind JUUL’s proliferation is its patented use of a “nicotine salt liquid formulation for generating an inhalable aerosol in an electronic cigarette.”⁹

⁷ JUUL, *JUUL Labs Names New Leadership Outlines Changes to Policy and Marketing Efforts* (Sept. 25, 2019), <https://newsroom.juul.com/juul-labs-names-new-leadership-outlines-changes-to-policy-and-marketing-efforts/>.

⁸ *How much nicotine is in a JUULpod?*, JUUL, <https://support.juul.com/hc/en-us/articles/360026223453-How-much-nicotine-is-in-a-JUULpod-> (last visited Nov. 5, 2019).

⁹ Nicotine salt formulations for aerosol devices and methods thereof, CA2909967A1 (filed May 6, 2013), <https://patents.google.com/patent/CA2909967A1/en> [hereinafter CA2909967A1].

37. The liquid solutions, or “e-liquids,” utilized in most electronic cigarettes contain freebase nicotine, which can stick to and cause irritation in the throat and upper respiratory tract when inhaled.

38. Freebase nicotine is also bitter, limiting its palatability.

39. JUUL recognized that adding certain acids to freebase nicotine creates nicotine salts, and that the ionized nicotine contained in nicotine salts carries a slight positive charge that makes it less harsh to inhale and less bitter to taste. As a JUUL research and design engineer explained in a 2015 interview with *Wired* magazine, certain acids “help stabilize the nicotine in such a way that makes it . . . I’ve got to choose the words carefully here: Appropriate for inhalation.”¹⁰

40. Specifically, JUUL uses benzoic acid to create the nicotine salts in its proprietary e-liquid, although its original patent covers a wide range of other acids as well.¹¹

41. The reduced harshness and bitterness of JUUL’s nicotine salts meant that, as a practical matter, JUUL could use larger amounts of nicotine in its e-liquids.

42. Before JUUL was introduced in 2015, the e-liquids in most commercially available electronic cigarettes were 1%-to-2% nicotine by weight.¹²

43. JUULpods are 5% and 3% nicotine by weight.¹³

44. While researchers have documented that the financial success of JUUL since its products were introduced in mid-2015 has spurred other vendors to try to raise the nicotine levels

¹⁰ David Pierce, *This Might Just Be the First Great E-Cig*, *Wired* (Apr. 21, 2015), <https://www.wired.com/2015/04/pax-juul-ecig/>.

¹¹ CA2909967A1, *supra* note 9.

¹² See, e.g., Maciej Goniewicz et al., Nicotine Levels in Electronic Cigarette Refill Solutions: A Comparative Analysis of Products From the U.S., Korea, and Poland, 26 *Int. J. Drug Policy* 583 (2015).

¹³ JUUL did not introduce its “3.0% nicotine strength” JUULpods until August 2018. See Angelica LaVito, *Leading E-Cig Maker JUUL to Sell Lower-Nicotine Pods As Scrutiny Ratchets Higher*, *CNBC* (July 12, 2018) <https://www.cnn.com/2018/07/11/juul-to-introduce-lower-nicotine-pods-for-some-of-its-flavors.html>.

of their products,¹⁴ information about this recent development in the industry, which has been marketing to consumers since 2003, is not known to the average consumer.

45. Furthermore, upon information and belief, JUUL's 5% by weight nicotine concentration remains substantially higher than the nicotine concentrations of most other commercially available e-cigarettes.

46. Not only do nicotine salts cause less irritation to users than free base nicotine when inhaled, nicotine salts also deliver nicotine to the bloodstream *faster* than freebase nicotine does.

47. Unlike freebase nicotine, nicotine in nicotine salts does not stick to the throat or upper respiratory tract when inhaled in aerosol. Instead, the nicotine travels directly into the lungs, which absorb nicotine faster than the throat or upper respiratory tract.

48. The higher concentrations of nicotine used in JUULpods, combined with the faster delivery of nicotine from nicotine salts, allow JUUL to mimic the experience more closely of smoking a combustible cigarette, or the "nicotine hit" experienced by smokers, than other electronic cigarettes are able to.

49. As JUUL described in its original patent, it discovered "that certain nicotine salt formulations provide satisfaction in an individual superior to that of free base nicotine, and more comparable to the satisfaction in an individual smoking a traditional cigarette. The satisfaction effect is consistent with an efficient transfer of nicotine to the lungs of an individual and a rapid rise of nicotine absorption in the plasma."¹⁵

¹⁴ Robert K. Jackler & Divya Ramamurthi, *Nicotine Arms Race: JUUL and the High-Nicotine Product Market*, Tobacco Control Epub ahead of print (Feb. 7, 2019).

¹⁵ CA2909967A1, *supra* note 9.

C. Representations That JUULpods Are “5.0% Nicotine Strength” or “3.0% Nicotine Strength” Tend to Mislead Reasonable Consumers.

50. Through representations that JUULpods contain “5.0% nicotine strength” or “3.0% nicotine strength,” JUUL uses ambiguity as to the material facts of how much nicotine JUULpods contain and deliver in a way that tends to mislead reasonable consumers about those facts.

51. A 2018 study evaluating high school students’ perception of the nicotine strength of JUUL found that after students were told that “JUULs contain 5% nicotine,” they “were more likely to think that JUULs contain low or medium nicotine (compared to high) than when they were given no information about nicotine content.”¹⁶

52. Researchers have taken particular interest in studying the effects of JUUL’s products and marketing practices on teenagers because teenagers constitute a substantial portion of JUUL users. Among all age groups, youth ages 15-17 demonstrate the second-highest prevalence of JUUL use, second only to young adults ages 18-21.¹⁷ Furthermore, youth ages 15-17 are 16 times more likely to be users of JUUL than adults ages 25-34.¹⁸

53. The 2018 study on the perceptions of high school students cited above found, overall, that “[a]fter informing students that JUULs contain 5% nicotine, 58.8% of all students thought JUULs contain a low or medium nicotine strength and 19.9% were unsure.”¹⁹

54. As discussed above, JUUL products deliver substantially higher amounts of nicotine than most electronic cigarettes, and one “5.0% nicotine strength” JUULpod delivers as much or more nicotine than one pack of 20 combustible cigarettes when its contents are inhaled as

¹⁶ Meghan E. Morean et al., *Adolescents’ Awareness of the Nicotine Strength and E-Cigarette Status of JUUL E-Cigarettes*, 204 *Drug and Alcohol Dependence* 107512 (2019), at 3.

¹⁷ Vallone et al., *supra* note 1.

¹⁸ *Id.*

¹⁹ Morean et al., *supra* note 16, at 2.

aerosol. By no measure do JUUL products contain “low” or “medium” amounts of nicotine as opposed to “high.”

55. Although the 2018 study cited evaluated high schoolers’ perceptions of JUUL’s “5.0% nicotine strength” representation, there is little reason to think that JUUL’s “5.0% nicotine strength” or “3.0% nicotine strength” representations are any less misleading to adults. The representations do not contain sufficient information to communicate anything clearly to a person of any age.

56. The representations merely list a low percentage alongside the phrase “nicotine strength.” As a functional matter, these representations only tend to mislead reasonable consumers into believing that JUULpods contain low amounts of nicotine, and/or that JUULpods deliver only a fraction of the amount of nicotine delivered by combustible cigarettes.

57. Furthermore, the actual meaning of the 5.0% and 3.0% figures, *i.e.*, that these are the percentages of nicotine by weight contained in JUULpods, underscores that the “5.0% nicotine strength” and “3.0% nicotine strength” representations tend to mislead. Percent by weight is no way implied or communicated by “percent strength,” which appears to be a comparative value. The percent by weight meaning is indicated only on the back of packages of “5.0% nicotine strength” JUULpods, and is not indicated anywhere on packages of “3.0% nicotine strength” JUULpods.

58. JUUL’s failure to state on the front of JUULpod’s packaging that “[percent] nicotine strength” means “[percent] nicotine by weight” tends to mislead reasonable consumers into believing that JUULpods contain low amounts of nicotine, and/or that JUULpods deliver only a fraction of the amount of nicotine delivered by combustible cigarettes.

59. Further compounding the misleading packaging is JUUL's omission of information on how use of e-cigarettes, or JUULpods in particular, directly compares to use of combustible cigarettes. On information and belief, daily JUULpod users consume 10 pods or more per month, and are likely to use other e-cigarettes too. A JUUL user who believes he or she is receiving some form of just 3% or 5% nicotine is unlikely to realize that this behavior is delivering the nicotine of an entire carton of cigarettes, or more, during the month.

60. It is material to consumers how much nicotine is delivered into their bloodstream by inhaling the aerosol from a given e-liquid.

CAUSE OF ACTION

61. Plaintiff Breathe DC incorporates by reference all of the allegations contained in the preceding paragraphs of this Complaint as if fully set forth herein.

62. Breathe DC brings this claim on behalf of itself and the general public against Defendant JUUL pursuant to D.C. Code §§ 28-3905(k)(1) and 28-3905(k)(2), for violations of the District of Columbia Consumer Protection Procedures Act (DC CPPA), D.C. Code § 28-3901, *et seq.*

63. JUUL is a "person" within the meaning of D.C. Code § 28-3901(a)(1), is a merchant under § 28-3901(a)(3), and provides "goods" within the meaning of § 28-3901(a)(7).

64. By labeling and marketing JUULpods as "5.0% nicotine strength" and "3.0% nicotine strength," when JUULpods contain among the highest concentrations of nicotine of commercially available e-liquids and one "5.0% nicotine strength" JUULpod delivers as much or more nicotine than one pack of 20 combustible cigarettes, JUUL has used innuendo or ambiguity as to a material fact which has a tendency to mislead. JUUL has therefore engaged in deceptive or unfair trade practices in violation of D.C. Code § 28-3904(f-1).

65. Furthermore, because JUUL markets and labels JUULpods as “5.0% nicotine strength” and “3.0% nicotine strength” without adequately disclosing that “[percent] nicotine strength” means “[percent] nicotine by weight,” JUUL has failed to state a material fact where such failure has a tendency to mislead. JUUL has therefore engaged in deceptive or unfair trade practices in violation of D.C. Code § 28-3904(f).

66. The DC CPPA makes such conduct unlawful trade practices “whether or not any consumer is in fact misled, deceived, or damaged thereby.” D.C. Code § 28-3904.

67. Pursuant to D.C. Code § 28-3905(k)(1)(D)(i), “a public interest organization may, on behalf of the interests of a consumer or a class of consumers, bring an action seeking relief from the use by any person of a trade practice in violation of a law of the District if the consumer or class could bring an action under subparagraph (A) of this paragraph for relief from such use by such person of such trade practice.”

68. The only limitation on this power of a public interest organization to act on behalf of consumers is that the public interest organization must have “sufficient nexus to the interests involved of the consumer or class to adequately represent those interests.” D.C. Code § 28-3905(k)(1)(D)(ii). As set forth in this Complaint, *see supra* ¶¶ 16-18, Plaintiff Breathe DC has a sufficient nexus to consumers of the Products to adequately represent those interests. Plaintiff Breathe DC was founded with the purpose of advocating for and educating consumers, including consumers in the District of Columbia, in the areas of healthy breathing, clean air, and truth-in-marketing. In addition, Plaintiff Breathe DC has retained the undersigned competent counsel, with significant experience in litigating under the DC CPPA, to pursue this action. Plaintiff Breathe DC has been consistently active in the District of Columbia and has previously sought to vindicate the rights of D.C. consumers through litigation.

69. Plaintiff is a nonprofit, public-interest organization pursuant to D.C. Code § 28-3905(k)(1)(D) and brings this action on behalf of consumers who could bring the action under D.C. Code § 28-3905(k)(1)(A).

70. Breathe DC is a “person” within the meaning of D.C. Code § 28-3901(a)(1), a “public interest organization” within the meaning of § 28-3901(a)(15), and a “non-profit organization” within the meaning of § 28-3901(a)(14).

71. Breathe DC brings this claim against Defendant JUUL for Defendant JUUL’s violation of the DC CPPA, D.C. Code § 28-3901 *et seq.*

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Breathe DC prays for judgment against Defendant JUUL and requests the following relief:

- A. a declaration that Defendant JUUL’s conduct is in violation of the DC CPPA;
- B. an order enjoining Defendant JUUL’s conduct found to be in violation of the DC CPPA, requiring corrective advertising to counteract perceptions that that JUULpods contain low amounts of nicotine and/or that JUULpods deliver only a fraction of the amount of nicotine delivered by combustible cigarettes throughout the District of Columbia, and requiring support for the provision of vaping cessation services throughout the District of Columbia;
- C. an order granting Plaintiff Breathe DC costs and disbursements, including reasonable attorneys’ fees and expert fees, and prejudgment interest at the maximum rate allowable by law; and
- D. such further relief, including equitable relief, as this Court may deem just and proper.

JURY TRIAL DEMANDED

Plaintiff Breathe DC hereby demands a trial by jury.

DATED: January 17, 2020

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Information Sheet, Continued

C. OTHERS

- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title 1, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 32 Qui Tam |
| <input type="checkbox"/> 16 Declaratory Judgment | <input type="checkbox"/> 33 Whistleblower |

II.

- | | | |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | <input type="checkbox"/> 20 Master Meter (D.C. Code § | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | 42-3301, et seq.) | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |



Attorney's Signature

January 17, 2020

Date