

Ordinance seeks to regulate immigration at the local level and imposes severe burdens on tenants living in apartment complexes and the local business people who operate those complexes. Courts in other jurisdictions, faced with similar local laws, have enjoined their implementation. *See Lozano v. City of Hazleton*, No. 3:06cv1586, 2006 U.S. Dist. LEXIS 79301 (M.D. Pa. Oct. 31, 2006); *Garrett v. City of Escondido*, No. 06CV2434 JAH (NLS) (S.D. Cal. Nov. 20, 2006); *Reynolds v. City of Valley Park*, No. 06-CC-3802 (Circuit Court of the County, Missouri, Sept. 27, 2006).

3. The Farmers Branch Ordinance imposes substantial criminal penalties on property owners, property managers and tenants, but provides no guidance on its implementation, putting local business owners and tenants at substantial and imminent risk of violating a law they cannot understand. The Ordinance also irrationally apportions its burdens on classes of tenants and landlords, exempting some landlords completely from the law's requirements and banning some lawful immigrants from renting in an apartment complex.

4. Plaintiffs have no plain, speedy, or adequate remedy at law other than the relief requested in this complaint. Unless enjoined by this Court, the Ordinance will impermissibly burden the constitutional and statutory rights of Plaintiffs.

JURISDICTION

5. This Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343 over Plaintiffs' causes of action under the Constitution of the United States, 42 U.S.C. §§ 1983, 1981 and 3601 *et seq.* Declaratory and injunctive relief is authorized by 28 U.S.C. § 2201 and § 2202 and Fed. R. Civ. P. 57 and 65.