

PLAINTIFF'S (Ann Smith et. al.) FIFTH AMENDED COMPLAINT – SUMMARY

Re Defendants: NJ Education Association; National Educ Assn; Harrison Twp Educ Assn; Kingsway Educ Assn; and Class of all NJEA Chapters and Affiliates.

Claim & Reason: "Unconstitutionally collecting dues or representation fees from agency payors and unwilling members; issuing contradictory & illegal instruction on resignation & cessation of dues; various procedural, policy & implementation failures that extend collections & violate rights. Injunction, declaratory judgment, compensation in law and equity."

Re Defendants: PERC Commissioners.

Claim & Reason: "Enforcement of unconstitutional statute and orders; issuing orders compelling Board Defendants to (i) collect representation fees; (ii) not obtain membership reauthorization. Declaratory judgment & injunction."

Re Defendant: Governor of New Jersey.

Claim & reason: "Enforcement of unconstitutional statute. Declaratory judgment and injunction."

Re Defendants: Clearview Reg'l HS Dist Board of Education; Harrison Twp Bd of Educ; Kingsway Reg'l Bd of Educ; class of all NJ school boards.

Claim & Reason: "Removing dues or representation fees from paychecks and transmitting them to CEA, NJEA, & NEA in violation of the Constitution. Declaratory judgment, injunction, and compensation on indemnified claim."