







On

3. Plaintiff Do No Harm is an organization of over 6,000 medical professionals, students, and policymakers dedicated to eliminating racial

1

discrimination in healthcare. Do No Harm has members who are Louisiana physicians as well as members who would qualify for appointment to the consumer slot but for their race. It brings this lawsuit on behalf of itself and its members to ensure that every doctor and qualifying public consumer in Louisiana has the equal right to serve on the Board, and to ensure that the people of Louisiana are regulated by a Board that is not selected on the basis of race.

JURISDICTION AND VENUE

- 4. This action arises under the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983. This Court has jurisdiction over these federal claims under 28 U.S.C. § 1331 (federal question), and § 1343(a)(3) (redress for deprivation of civil rights). Declaratory relief is authorized by the Declaratory Judgment Act, 28 U.S.C. § 2201.
- 5. Venue is proper in this Court under 28 U.S.C. § 1391(b)(1) and under 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claim occurred and continue to occur in this district.

PARTIES

