

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
CASE NO.**

CAIR FLORIDA, INC., Plaintiff,

v.

TEOTWAWKI INVESTMENTS, LLC
d/b/a FLORIDA GUN SUPPLY, Defendant.

COMPLAINT
I. INTRODUCTION

1. In July 2015, Florida Gun Supply declared that it was a “Muslim Free Zone.”
2. Florida Gun Supply may not discriminate or segregate against anyone based upon religion.
3. The Plaintiff, CAIR Florida, Inc. (“CAIR-FL”), sues Defendant, Teotwawki Investments, LLC doing business as Florida Gun Supply (“Florida Gun Supply”) pursuant to 42 U.S.C. § 2000a-3(a).

II. PARTIES

4. CAIR-FL is a Florida non-profit corporation.
5. CAIR-FL “was established in 2001 to challenge stereotypes of Islam and Muslims and defend civil liberties.” CAIR Florida's mission is to enhance understanding of Islam, encourage dialogue, protect civil liberties, empower American Muslims, and build coalitions that promote justice and mutual understanding. See <http://cairflorida.org/page/about.html>
6. CAIR-FL is headquartered in Broward County, Florida.
7. CAIR-FL represents the civil rights interests of Muslims living and visiting Florida.

8. CAIR-FL has an interest in assuring that all Muslims living or visiting Florida receive “the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation.” *See* 42 U.S.C. § 2000a (a).
9. The people that CAIR-FL represents include Muslims that have a right to purchase guns, browse guns, take classes on gun safety, shoot guns at the range, and visit the gun range for entertainment purposes and not be discriminated against.
10. Florida Gun Supply is a fictitious name owned by Teotwawki Investments, LLC.
11. Teotwawki Investments, LLC is a Florida limited liability company with a principal place of business in Citrus County, Florida.
12. Andrew L. Hallinan is the sole member of Teotwawki Investments, LLC.

III. JURISDICTION & VENUE

13. The district courts have jurisdiction pursuant to 42 U.S.C. § 2000a-6(a).
14. Venue is proper in the Southern District of Florida pursuant to 28 U.S.C. § 1391(b)(2).
15. CAIR-FL is headquartered in Broward County, Florida.
16. Florida Gun Supply’s discriminatory declaration that it has implemented a “Muslim Free Zone” was viewed on national television and on the internet by many Muslims in Broward and Miami-Dade Counties, Florida.
17. In Florida, many more Muslims reside in Broward and Miami-Dade counties than in Citrus County, Florida.

IV. FACTS

18. From on or about July 17, 2015 to present, Florida Gun Supply has initiated a “Muslim Free Zone.”

19. Florida Gun Supply offers various activities for entertainment purposes to the general non-Muslim public.

20. Florida Gun Supply exhibits guns.

21. Florida Gun Supply provides gun safety classes.

22. Florida Gun Supply permits non-Muslims to attend shooting classes.

23. Florida Gun Supply permits non-Muslims to browse its inventory.

24. Florida Gun Supply permits non-Muslims to purchase guns.

25. Shooting Guns at gun ranges like Florida Gun Supply is a form of entertainment.

26. Looking at guns is form of entertainment.

27. Shooting guns is a form of entertainment.

28. Participating in gun safety classes is a form of entertainment.

29. Florida Gun Supply is a place of entertainment.

30. Recreational shooting is entertainment.

31. Florida Gun Supply has a shooting range.

32. Florida Gun Supply does not allow Muslims to benefit from the entertainment it provides the general Non-Muslim public.

33. Florida Gun Supply discriminates against Muslims.

34. Florida Gun Supply does not require non-Muslims take an oath.

35. Florida Gun Supply requires that Muslims take an oath.

36. Florida Gun Supply has singled out Muslims as a group of people that it intends to treat differently.

37. Florida Gun Supply exhibits guns.

38. Florida Gun Supply provides entertainment.

39. Florida Gun Supply has a policy that segregates and discriminates against Muslims.
40. The policy is known as a “Muslim Free Zone.”

V. CIVIL ACTION FOR INJUNCTIVE RELIEF

41. Florida Gun Supply is a place of exhibition as defined by 42 U.S.C. § 2000a (b)(3).
42. Florida Gun Supply is a place of entertainment as defined by 42 U.S.C. § 2000a (b)(3).
43. CAIR-FL and the constituency it represents have been injured and continue to be injured by Florida Gun Supply’s discrimination and segregation of Muslims.
44. Florida Gun Supply’s “Muslim Free Zone” policy violates 42 U.S.C. § 2000a (a).
45. During the past ten days Florida Gun Supply has withheld, deprived or attempted to do so by expressing that it is a “Muslim Free Zone” where Muslims will be held to a different standard than non-Muslims in violation of 42 U.S.C. § 2000a-2.
46. The policy statements made by Florida Gun Supply threaten and intimidate CAIR-FL and the people the organization exists to protect from discrimination.
47. CAIR-FL and its constituency have been deprived of their civil rights.
48. CAIR-FL is aggrieved by Florida Gun Supply’s “Muslim Free Zone” policy.
49. CAIR-FL seeks all relief available to it pursuant to 42 U.S.C. § 2000a-3.

WHEREFORE, Plaintiff demands an injunction against Florida Gun Supply prohibiting it from discriminating against Muslims, restraining Florida Gun Supply from instituting any policies or practices that discriminate or segregate people on the basis of religion as well as attorneys’ fees and costs pursuant to 42 U.S.C. § 2000a-3(b), and any other relief deemed appropriate by the Court.

Respectfully submitted this 29th day of July 2015.

/s/ Michael N. Hanna

Michael N. Hanna, Esq.
Florida Bar Number 85035
Morgan & Morgan
600 N Pine Island Road
Suite 400
Plantation, FL 33324
Tel: (954)318-0268
Fax: (954)327-3015

Bernard R. Mazaheri, Esq.
Florida Bar Number 643971
Morgan & Morgan
20 N Orange Avenue
Suite 1600
Orlando, FL 32801
Tel: (407)420-1414
Fax: (407)245-3487

Counsel for Plaintiff