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Filed and Attested by the
Office of Judicial Records
17 NOV 2026 11:51 am
D. SAVAGE

WINTER PARTS, REED WILLIAMS, and MICHE PALMER, Plaintiffs, v. THE CITY OF PHILADELPHIA, and KATHLEEN TITUS, Defendants.	IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PENNSYLVANIA NO. CIVIL ACTION - LAW

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within TWENTY (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. **YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

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PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
One Reading Center Philadelphia, Pennsylvania 19107
Telephone: (215) 238-1701

Dated: *November 17, 2026*

/s/ Andrew Lacy, Jr.

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Attorneys for Plaintiffs

WINTER PARTS, REED WILLIAMS, and MICHE PALMER, Plaintiffs, v. THE CITY OF PHILADELPHIA, Defendant.	IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PENNSYLVANIA NO. CIVIL ACTION - LAW

COMPLAINT

Plaintiffs Winter Parts ("Parts"), Reed Williams ("Williams"), and Miche Palmer ("Palmer") (collectively, "Plaintiffs"), by and through their attorneys, allege as follows:

Preliminary Statement

1. This action seeks to remedy systemic discriminatory practices in the Philadelphia Marathon (the "Marathon").

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2. The Marathon is an annual race that takes place each November within the city of Philadelphia, and it is organized by Defendant, The City of Philadelphia.

3. The first Philadelphia Marathon took place in 1994, with 1,500 athletes participating. The Marathon has since grown tremendously. Approximately 17,000 people competed in the 2025 Marathon.

4. The Marathon has three divisions: Open Division, Professional (formerly Elite) Division, and Professional (formerly Elite) Wheelchair Division. (https://www.philadelphiamarathon.com/races/marathon/).

5. Runners may register for the Open Division as male, female, or nonbinary.

6. In contrast, for the Professional Division or the Professional Wheelchair Division ("Professional Divisions"), athletes can only register as male or female. The Marathon does not offer a nonbinary classification for athletes in the Professional Divisions.

7. The Professional Divisions award more and higher cash prizes than the Open Division.

8. Athletes in the Professional Divisions also may benefit from a number of privileges that the Marathon does not provide, or makes less available, to nonbinary athletes competing in the Open Division. Examples have included access to a sheltered waiting area before races and special bag check, starting earlier in the group, their personal drinks available along the route, and ceremony recognitions. These benefits may both provide higher status and concrete performance advantages that affect run times.

9. Nonbinary athletes must either register as male or female in the Professional Division – thereby misgendering themselves – or accept inferior treatment, including lower cash prizes and lesser benefits throughout the race, compared to Professional Division peers.

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10. Parts, Williams, and Palmer, along with Philadelphia-based running clubs Queer Run and Lez Run and other LGBTQIA+ athletes and allies, have tried for years to change this discriminatory policy, to no avail.

11. The Philadelphia Fair Practices Ordinance, Philadelphia, Pa., Code §§ 9-1102(1)(k) & 9-1106, makes it illegal to discriminate in public accommodations on the basis of sex or gender identity, which includes nonbinary gender identity.

12. Under this law, people of all gender identities have the right to participate in the Marathon on an equal basis.

13. Plaintiffs therefore allege that the Philadelphia Marathon denies equal benefits and treatment, in violation of the Philadelphia Fair Practices Ordinance, to nonbinary runners.

Jurisdiction and Venue

14. This Court has jurisdiction pursuant to 42 Pa. C.S.A. § 931 because the unlawful practices complained of herein occurred in Pennsylvania and allege violation of local laws.

15. Venue is proper pursuant to Pa. R. Civ. P. 1006 and 2103 in that defendant is located in Philadelphia County, Pennsylvania.

16. On July 2, 2025, Plaintiffs filed a complaint in the Philadelphia Commission on Human Rights ("PCHR") challenging the violations alleged herein, and in August 2026, the PCHR issued a dismissal and notice of rights, attached as Exhibit 1.

Parties

17. Parts is a nonbinary runner who is qualified for the Professional Division of the Marathon.

18. Parts lives in Maryland and regularly travels to participate in runs.

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19. Williams is a nonbinary runner who is qualified for the Professional Division of the Marathon.

20. Williams lives in New York and regularly travels to participate in runs.

21. Palmer is a nonbinary runner who is qualified for the Professional Division of the Marathon.

22. Palmer lives in Connecticut and regularly travels to participate in runs.

23. Defendant the City of Philadelphia is the organizer of the Marathon.

24. Defendant Kathleen Titus is the Marathon's Race Director, sued in her individual capacity.

Factual Allegations

Background

25. The Philadelphia Marathon fails to provide gender classifications other than male and female to individuals seeking to register for the Professional Divisions.

26. Runners and organizations of runners (run clubs) who are LGBTQIA+ have worked for years seeking equality from the Marathon, asking it to end its discriminatory practices and implement polices more inclusive of them.

27. Particularly for such run clubs in Philadelphia, the preeminent local running event's refusal to treat nonbinary runners equally perpetuates a culture that already discourages and disincentivizes trans and nonbinary runners, who too often feel as though there is no space for them in the running scene, particularly if they are not already elite runners.

28. After years of efforts by these run clubs, their members, and other activists, the Marathon allowed entrants to register as nonbinary in 2022.

29. The Marathon limited that access to the general (non-Professional) categories.

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30. The published results following the 2022 Marathon initially misgendered all nonbinary participants.

31. In 2023, Josh Fernandez and C.C. Tellez, the heads of Queer Run and Lez Run, respectively, met several times with Kathleen Titus, the Marathon's Race Director. They discussed establishing a Professional Division offering equal benefits, status, and prize money to nonbinary athletes.

32. In August 2023, Titus and Lauren Lubin, who the Marathon said it hired to help design policy and procedures regarding nonbinary athlete participation in the Marathon, informed Fernandez and Tellez that the Marathon planned to allow elite nonbinary athletes to select and register for either the male or female Elite Division.

33. On September 15, 2023, Tellez and Fernandez wrote to Titus and Lubin explaining that the stated plan was inadequate, risked dehumanizing nonbinary participants, and potentially violated Philadelphia's Fair Practices Ordinance.

34. On October 24, 2023, Titus informed Tellez and Fernandez that there would be no changes to the nonbinary policy for the 2023 Marathon.

35. Tellez and Fernandez continued to express concerns and suggest alternative proposals, before and after this determination.

36. Between 2023 and 2025, there were three Marathons, for each of which Defendant offered lower cash prizes to elite nonbinary athletes than it offered to equivalent male and female athletes and otherwise discriminated against nonbinary athletes.

37. In each of the three years, elite nonbinary runners were forced to choose between registering under a gender classification with which they did not identify or forfeiting any chance

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at the most lucrative cash prizes in addition to the other privileges of participating in the Professional Division

38. Privileges of the Professional Division (beyond the higher cash prizes), which may be denied or less available to nonbinary runners competing in the Open Division, include: free registration; access to a VIP bag drop/tent area which allows runners to await the start of the race more comfortably; starting in an earlier "wave" (i.e., starting closer to the front rather than the middle or back of the pack of runners); and the ability to place a runner's own preferred drinks along the marathon route.

39. The 2026 Marathon will maintain the same format without a Professional Division for nonbinary athletes, again forcing nonbinary runners to choose between misgendering themselves or forfeiting the numerous advantages and larger cash prizes available in the Professional Division.

40. Other marathons and races have nonbinary professional registration, including races approved by national governing body USA Track & Field (USATF). These include the Jersey City Marathon and Half Marathon, the Missoula Marathon, the Vermont City Marathon, the Maine Marathon, and the Philadelphia Distance Run.

Plaintiff Winter Parts

41. Parts participated in the Marathon once. Parts also participated in the Philadelphia Half Marathon, a race that is part of Philadelphia Marathon Weekend, twice.

42. Parts regularly participates in runs throughout the country and has not participated in Philadelphia Marathon Weekend since 2023 only because of its discrimination against nonbinary runners.

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43. Parts first participated in the Philadelphia Half Marathon in 2021. The Marathon did not allow participants to register as nonbinary until 2022. As a result, Parts had no choice but to misgender themself and register as male to compete in the Half Marathon.

44. Parts was excited to hear that the Marathon would allow athletes to register as nonbinary in 2022.

45. Parts registered as nonbinary in the Open Division of the 2022 Marathon.

46. Parts thereby forfeited any chance at a cash prize.

47. Parts finished first in the nonbinary division of the 2022 Marathon.

48. Had the Marathon allowed for nonbinary registration in the Elite Division and offered the same cash prizes to athletes registered as nonbinary as it did to those who registered as male or female, Parts would have received $10,000 for finishing first. Because of the discriminatory policy, Parts instead received nothing.

49. When Parts reached the finish line, they found that the Marathon was directing male athletes to one side and female athletes to the other and did not have a place for nonbinary athletes.

50. When the Marathon released results for the 2022 race on its website, it classified all runners as either male or female. Parts was misgendered and listed as male despite having registered as nonbinary.

51. When Parts emailed the Marathon to address the misgendering of the results, the initial response was dismissive.

52. In 2023, in part because of the improvements the Marathon had professed to make concerning its treatment of nonbinary athletes, Parts registered in the Open Division of the Philadelphia Half Marathon as nonbinary.

53. Parts thereby forfeited any chance at a cash prize.

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54. Parts finished second in the nonbinary division.

55. Had the Philadelphia Half Marathon allowed for nonbinary registration in the Elite Division and offered the same cash prizes to athletes registered as nonbinary as it did to those who registered as male or female, Parts would have received prize money for finishing second. Because of the discriminatory policy, Parts instead received nothing.

56. Since around 2021, Parts has regularly traveled to participate in races across the country, including marathons or half marathons in, inter alia, Chicago, Boston, California, New Jersey, and Indianapolis.

57. Because of the discrimination that Parts experienced and witnessed in 2022 and 2023 against nonbinary athletes, which has not changed, Parts chose not to participate in any Philadelphia Marathon Weekend events since 2023.

58. Parts has chosen to participate in marathons other than the Philadelphia Marathon in recent years, resulting in disadvantages, including additional travel time and expense and the accompanying effects on Parts's mental and physical readiness.

59. Parts has participated in nonbinary categories in other USATF-approved races in the Philadelphia area, including the Philadelphia Distance Run and Broad Street Run. Parts has earned prize money from each of those races equivalent to that they would have received had they placed the same in the men's or women's division.

60. Parts continues to participate in each of these races annually because they offer equal treatment.

61. Parts would like to run events in the Philadelphia Marathon Weekend, and plans to do so after the policy is changed and the discrimination has ended.

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Plaintiff Reed Williams

62. Williams first participated in Philadelphia Marathon Weekend in 2023, when they ran the half marathon.

63. Although Williams registered for the 2023 race in the men's category because that felt most appropriate at the time, they registered with a group of athletes, many of whom are nonbinary.

64. The group was concerned about the Marathon's stated policy of checking each runner's legal identification at the time they pick up their race bib to ensure that their name and gender matched their registration. Other races that allowed for registration as nonbinary did not have any such requirement.

65. The group wrote to the Marathon to explain that certain runners had identification that did not match their registration status, seeking confirmation that this would not impede their ability to compete in the half marathon. The Marathon did not meaningfully respond.

66. Williams completed the 2023 half marathon and witnessed nonbinary runners, including those with whom they registered, misgendered at the finish line.

67. Williams registered for the 2024 Marathon in the Open Division as nonbinary.

68. Williams thereby forfeited a chance at receiving the higher cash prize available to those in the Elite Division.

69. Williams came in first place in the nonbinary division of the 2024 Marathon.

70. Had the Marathon allowed for nonbinary registration in the Elite Division and offered the same cash prizes to athletes registered as nonbinary as it did to those who registered as male or female, Williams would have received $10,000 for finishing first. Because of the discriminatory policy, Williams instead received a cash prize of only $4,000.

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71. Despite finishing first in the nonbinary open division, Williams had a poor race day experience at the 2024 Marathon because of the lack of Professional Division privileges.

72. As a result, Williams chose not to participate in the 2025 or 2026 Marathon.

73. Williams would like to run events in the Philadelphia Marathon Weekend and plans to do so after the policy is changed and the discrimination has ended.

74. Williams has run several marathons and half marathons beginning in or around 2022 and often travels to participate in races. By way of example, Williams has run marathons in Jersey City, Boston, and Indianapolis in addition to the Philadelphia Marathon.

75. Williams registered in the nonbinary division of the Elite Field (the equivalent of Philadelphia's Professional Division) in the 2026 Jersey City Marathon. Williams, as a participant in the elite field, was offered a free hotel room in Jersey City, free registration for the race, and access to a tent reserved for the Elite Field for use before the start of the race. Williams finished first in the nonbinary division of the Elite Field and received the same prize money as that offered to the first place finisher in the men's and women's divisions.

Plaintiff Miche Palmer

76. Palmer has participated in the Philadelphia Half Marathon and is registered for, and plans to run, the Marathon this year.

77. Palmer registered and participated in the nonbinary category for the 2023 Philadelphia Half Marathon in the Open Division.

78. Palmer was also qualified for the Masters' category, because they were 41 years old.

79. Palmer finished first in the Masters' category.

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80. Because of the Marathon's discriminatory policy, Palmer did not receive equal prize money.

81. In addition, Palmer suffered from the denial of access to the status and advantages of the Professional Division of the Philadelphia Marathon.

82. Palmer regularly travels both domestically and internationally for marathons, and since 2018 has run marathons in Chicago, New York, Tokyo, Berlin, Boston, California, and Vermont.

83. Palmer ran the New York City Marathon, a USATF-certified course, in 2022, in the nonbinary division. The race offered prize money to nonbinary athletes and male and female athletes.

84. Palmer is registered for and plans to run the Marathon this year. Palmer was hesitant to participate again while the discriminatory policy continues. However, because training partners from their running club are participating, they decided to register and run despite the harms of the discrimination.

85. Palmer would like to and plans continue to run events in the Philadelphia Marathon Weekend in future years.

Queer Run and Lez Run

86. Members and leaders of Queer Run and Lez Run have witnessed these continuing inequalities and the harms they cause.

87. Queer Run is dedicated to creating safe spaces for Philadelphia-area LGBTQIA+ athletes and allies of all running paces.

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88. Lez Run is a run club established in Philadelphia in 2014 to provide LGBTQIA+ athletes a safe, supportive and healthy outlet via running regardless of their level of experience. It is a Member Club of the International Front Runners, a body that seeks to promote the sports of running, walking and related athletic activities for gender and sexually diverse people and their allies.

89. The Marathon is the premier event for runners in the Philadelphia area, and Defendant's continued discrimination against nonbinary athletes has caused significant damage to the organizations' ability to encourage LGBTQIA+ individuals in the Philadelphia area to participate fully in the Philadelphia running community and its marquee event.

90. Members have discussed that they are not comfortable participating in the Philadelphia Marathon Weekend because of its policies, including its refusal to end discrimination against nonbinary professional registrants, and officers of the organizations have chosen to refrain from participating for this reason. Training for and celebrating their hometown marathon becomes complicated by discomfort or shame about supporting an event they feel discriminates against their community.

91. The organizations would like to promote the Marathon's official training runs and ambassador program, but are not able to because doing so would appear to support the Marathon's discrimination against members of their community.

92. Instead of collaborating to create a community that provides equal access for all, Marathon officials have acted in ways that appear adversarial and hostile to the organizations and the nonbinary and other LGBTQIA+ people who Queer Run and Lez Run represent.

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Cause of Action

Discrimination under the Philadelphia Fair Practices Ordinance

93. Plaintiffs re-allege and incorporate herein all previously alleged paragraphs of the Complaint.

94. By the acts and practices described above, Defendant has interfered with the public accommodations opportunities of Plaintiffs in violation of the Fair Practices Ordinance.

95. Defendant's misconduct was done willfully and with actual malice.

96. Because of Defendant's discriminatory acts, Plaintiffs have been unable to register in the 2024 and 2025 Professional divisions and will be unable to register for the 2026 Professional divisions.

97. As a result, they have suffered and will continue to suffer economic damage, emotional distress, and other compensable damages.

Prayer for Relief

WHEREFORE, Plaintiffs request that the Court:

(a) Declare that the acts and practices complained of herein violate the Fair Practices Ordinance;

(b) Permanently restrain Defendant from violating the Fair Practices Ordinance, including enjoining it to cease all discriminatory practices against nonbinary athletes in the Philadelphia Marathon;

(c) Direct Defendant to take such affirmative steps as are necessary to ensure that the effects of these unlawful practices are eliminated and full, equal, unsegregated public accommodations, advantages and facilities are available;

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(d) Award Plaintiffs out-of-pocket damages for all economic losses, including earnings they would have received but for Defendant's unlawful practices;

(e) Award Plaintiffs compensatory damages for emotional distress;

(f) Direct Defendant to pay punitive damages for its unlawful conduct;

(g) Direct Defendant to pay Plaintiffs' reasonable attorneys' fees and costs;

(h) Award pre- and post-judgment interest as permitted by law; and

(i) Award such other relief that the Court deems just and proper.

Dated: *November 17, 2026*

/s/ Andrew Lacy, Jr.

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Counsel for Plaintiffs

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EXHIBIT 1

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PHILADELPHIA COMMISSION ON HUMAN RELATIONS

DISMISSAL AND NOTICE OF RIGHTS

To:
Maia Goodell, Esq.
Vladeck Raskin Clark, P.C.
111 Broadway, Suite 1505
New York, NY 10006

From:
Philadelphia Commission on Human Relations
601 Walnut Street, Suite 300 South
Philadelphia, PA 19106
215-686-4670 (p) 215-686-4684 (f)

PCHR Complaint No.: 2025-07-07-20864

Date of Commission Decision: 8/21/2026

Re: Winter Parts v. City of Philadelphia

The Philadelphia Commission on Human Relations is closing its file on this complaint for the following reasons

☐ **Charge Not Substantiated** – The PCHR is unable to conclude that the information obtained through our investigation establishes a violation of the Philadelphia Fair Practices Ordinance. This does not certify that *the Respondent is* in compliance with the Philadelphia Fair Practices Ordinance. No finding is made as to any other issues that might be construed as having been raised by this complaint.

☐ **Failure to Cooperate** – After 30 days in which to respond, the Complainant failed to provide information, failed to appear or to be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve the complaint.

☐ **Failure to Locate** – Though reasonable efforts were made to locate the Complainant, we were not able to do so.

☐ **Complaint Withdrawn** – The PCHR has complied with the Complainant's request for withdrawal of the complaint referenced above.

☐ **Lack of Jurisdiction** – The facts alleged in the complaint fail to state a claim over which the PCHR has enforcement authority because the Complainant waited too long after the date(s) of the alleged discrimination to file the complaint, the discrimination alleged occurred outside Philadelphia or for some other reason(s).

☐ **Satisfactorily Adjusted** – The parties entered a settlement agreement that provides relief for the harm(s) alleged.

☐ **Waiver to EEOC** – The Complainant has requested that the case be waived to the Equal Employment Opportunity commission for further processing.

☒ **Right to Sue Requested** – The Complainant has requested the right to pursue this matter further by bringing suit in the appropriate court against the Respondent.

☐ **Conciliation** – After a finding of probable cause, the parties entered a conciliation agreement that provides full relief for the violations established by our investigation. The complaint will be closed accordingly, but the Conciliation Agreement will remain on file and subject to review by the Commission during the period it is in effect.

☐ **Other** – Administrative Action.

No further action is required at this time.

On behalf of the Commission

Name

August 21, 2026
Date

Case ID: 261102210

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PHILADELPHIA COMMISSION ON HUMAN RELATIONS

DISMISSAL AND NOTICE OF RIGHTS

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From:
Philadelphia Commission on Human Relations
601 Walnut Street, Suite 300 South
Philadelphia, PA 19106
215-686-4670 (p) 215-686-4684 (f)

PCHR Complaint No.: 2025-07-07-20865

Date of Commission Decision: 8/21/2026

Re: Reed Williams v. City of Philadelphia

The Philadelphia Commission on Human Relations is closing its file on this complaint for the following reasons

☐ **Charge Not Substantiated** – The PCHR is unable to conclude that the information obtained through our investigation establishes a violation of the Philadelphia Fair Practices Ordinance. This does not certify that *the Respondent is* in compliance with the Philadelphia Fair Practices Ordinance. No finding is made as to any other issues that might be construed as having been raised by this complaint.

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☐ **Other** – Administrative Action.

No further action is required at this time.

On behalf of the Commission

Pamela Gaudreau

Name

August 21, 2026

Date

Case ID: 261102210

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PHILADELPHIA COMMISSION ON HUMAN RELATIONS

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New York, NY 10006

From:
Philadelphia Commission on Human Relations
601 Walnut Street, Suite 300 South
Philadelphia, PA 19106
215-686-4670 (p) 215-686-4684 (f)

PCHR Complaint No.: 2025-07-07-20866

Date of Commission Decision: 8/21/2026

Re: Miche Palmer v. City of Philadelphia

The Philadelphia Commission on Human Relations is closing its file on this complaint for the following reasons

☐ **Charge Not Substantiated** – The PCHR is unable to conclude that the information obtained through our investigation establishes a violation of the Philadelphia Fair Practices Ordinance. This does not certify that *the Respondent is* in compliance with the Philadelphia Fair Practices Ordinance. No finding is made as to any other issues that might be construed as having been raised by this complaint.

☐ **Failure to Cooperate** – After 30 days in which to respond, the Complainant failed to provide information, failed to appear or to be available for interviews/conferences, or otherwise failed to cooperate to the extent that it was not possible to resolve the complaint.

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☐ **Lack of Jurisdiction** – The facts alleged in the complaint fail to state a claim over which the PCHR has enforcement authority because the Complainant waited too long after the date(s) of the alleged discrimination to file the complaint, the discrimination alleged occurred outside Philadelphia or for some other reason(s).

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☐ **Other** – Administrative Action.

No further action is required at this time.

On behalf of the Commission

Timothy Lin Street

Name

August 21, 2026

Date

Case ID: 261102210

Docusign Envelope ID: 6360D378-B091-8F79-80E8-2756263BA4DB

ATTORNEY VERIFICATION

I, Andrew Lacy, Jr., hereby state that I am attorney for the Plaintiffs in this action and that the facts in the Complaint are true and correct to the best of my knowledge, information, and belief.

I understand that the statements in this Verification are made subject to the penalties of 18 U.S.C.A. § 1001 relating to unsworn falsification to authorities.

Date: November 17, 2026

By: */s/ Andrew Lacy, Jr.*
Andrew Lacy, Jr.

I, Maia Goodell, hereby state that I am attorney for the Plaintiffs in this action and that the facts in the Complaint are true and correct to the best of my knowledge, information, and belief.

I understand that the statements in this Verification are made subject to the penalties of 18 U.S.C.A. § 1001 relating to unsworn falsification to authorities.

By:
Maia Goodell

Case ID: 261102210

Docusign Envelope ID: 6360D378-B091-8F79-80E8-2756263BA4DB

PLAINTIFF VERIFICATION

I, Winter Parts, verify that the statements contained in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief.

I understand that the statements made in this Complaint are subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn declarations to authorities.

Date: 11/16/2026 By: Signed by: Winter Parts E9B283AEE7AA40E...

PLAINTIFF VERIFICATION

I, Reed Williams, verify that the statements contained in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief.

I understand that the statements made in this Complaint are subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn declarations to authorities.

Date: 11/16/2026 By: Signed by: Reed Williams FA951ED838CF437...

PLAINTIFF VERIFICATION

I, Miche Palmer, verify that the statements contained in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief.

I understand that the statements made in this Complaint are subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn declarations to authorities.

Date: 11/16/2026 By: Signed by: Miche Palmer 829320C2F20349D...