

9. The governor of Georgia signed HB 826 into law and it has been enrolled as Act 575.
10. Act 575 provides, *inter alia*, that GWL holders are exempt from the provisions against carrying a weapon in a school safety zone.
11. After Act 575 became effective, Defendant's representatives were quoted in a local Alpharetta media outlet saying that it remains a crime to carry a firearm in school safety zones, even for people with GWLs.
12. On or about August 12, 2014, Plaintiff contacted the author of the news article, pointing out that under Act 575 a person with a GWL could carry a firearm at a school.
13. On or about August 12, 2014, the author replied that she had conferred with the "school board attorney," who reiterated that the board continues to view it as a crime for a GWL holder to carry a firearm in a school safety zone.
14. Plaintiff visits NPES for the purpose of participating in the education of his child, on a frequent basis.
15. Plaintiff desires to carry a weapon at NPES in case of confrontation, and he would do so if it were legal for him to do so.
16. As a result of the public comments attributed to Defendant, Plaintiff is in fear of arrest and prosecution for carrying a weapon at NPES, even though it no longer is criminal for him to do so (effective July 1, 2014).

Count 1 – Violations of O.C.G.A. § 16-11-127.1

17. Plaintiff and Defendant have an actual controversy between them regarding the effects of Act 575 on Plaintiff.

18. Even if there were no actual controversy between Plaintiff and Defendant, Plaintiff desires to confirm his right since July 1, 2014 to carry a firearm on Defendant's property without fear of detention, prosecution, imprisonment, and fine.

Relief Demanded

Plaintiff demands the following relief:

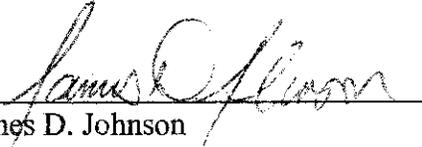
19. A declaration that as of July 1, 2014, GWL holders are exempt from the prohibition in O.C.G.A. 16-11-127.1 of carrying a weapon in a school safety zone.
20. An injunction prohibiting Defendant from arresting, citing, fining, or prosecuting Plaintiff for carrying a weapon in a school safety zone for as long as Plaintiff maintains a GWL.
21. An interlocutory injunction prohibiting Defendant from arresting, citing, fining, or prosecuting Plaintiff for carrying a weapon in a school safety zone during the pendency of this action, for as long as Plaintiff maintains a GWL.
22. The costs of bringing and maintaining this action.
23. A jury to try this case.
24. Any other relief the court deems proper.



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VERIFICATION

I verify under penalty of perjury that the facts alleged in the foregoing Complaint are true.


James D. Johnson

The above-named James D. Johnson appeared before me on August 22 2014 in
FULTON County, GEORGIA and swore to and subscribed to this document.


Notary Public

My commission expires: 05/08/2014

