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FILED  
U.S. DISTRICT COURT

2012 MAY 17 P 3:01

IN THE UNITED STATES DISTRICT COURT, DISTRICT OF UTAH,  
CENTRAL DIVISION

DISTRICT OF UTAH

DEPUTY CLERK

TIMOTHY W. LAWSON  
Plaintiff,  
vs.  
ORRIN HATCH  
Defendants.

COMPLAINT

Case: 2:12cv00492  
( Assigned To : Warner, Paul M.  
Assign. Date : 5/17/2012  
Description: Lawson v. Hatch

Timothy W. Lawson ("Lawson") complains of Orrin Hatch ("Hatch") as follows:

PARTIES

1. Lawson is a resident of Utah with an address of 766 East 2950 North, Provo, Utah 84604.
2. Hatch is a resident of Washington District of Columbia.

JURISDICTION AND VENUE

3. This Court has jurisdiction in light of the existence of a controversy arising under the laws of the United States (28 U.S.C. § 1331), in light of diversity of citizenship of the parties (28 USC § 1332), and supplemental jurisdiction under 28 U.S.C. § 1367. The amount in controversy, exclusive of interest and costs, exceeds \$75,000.00. This action is not collusive so as to confer jurisdiction on a Court of the United States that would not otherwise have jurisdiction.

4. Venue is proper in the District of Utah under 28 USC §1391(a), (b).

FACTS

5. Hatch is an elected official from the State of Utah.
6. Hatch serves on the Department of Health and Human Services senate committee which allocates funds to the Food and Drug Administration (“FDA”).
7. Hatch has and is aware of the studies and research detailing the need for proper Gluten Free labels.
8. Hatch is depriving the FDA of the necessary funds to do the required research into Gluten Free labeling.
9. Without the proper funding, the FDA has been unable to do the required research into Gluten Free labeling.
10. Without the necessary research the FDA has been forced to adopt lower standards for Gluten Free labeling.
11. Because the FDA has been forced to accept lower standards for Gluten Free labels, dangerous amounts of gluten are contained in products that exhibit Gluten Free labels.
12. The FDA has been forced by the apparent lack of funding, to adopt a level that may prove harmful to those who must eliminate the gluten from their diets as a medical necessity.
13. Lawson suffers from Refractory Type 2 Celiac Sprue.
14. Lawson is harmed by Hatch’s refusal to fund the FDA.
15. Hatch advocates allowing companies to make general health claims about their products but exempts them from federal reviews of their safety or effectiveness before they go to market.
16. Hatch’s advocacy to underfund the FDA has hindered regulators from preventing dangerous products from being put on the market. Some of those dangerous products are products that include dangerous levels of gluten but are labeled Gluten Free.
17. Hatch advocates allowing products on the market that exhibit Gluten Free labels but actually contain dangerous levels of gluten.

CAUSES OF ACTION

1. MISAPPROPRIATION OF TAXPAYER FUNDS

18. Hatch knowingly and willfully spends taxpayer funds on other less formidable projects.

19. Hatch knowingly and willfully deprives the Food and Drug Administration necessary funds.

20. Hatch knowingly and willfully and with criminally negligent or without authority of law deprives the Food and Drug Administration necessary funds for research which cause direct harm to individuals.

II. CONFLICT OF INTEREST

21. Hatch is an elected official.

22. Hatch at all times acted in his capacity as an elected official.

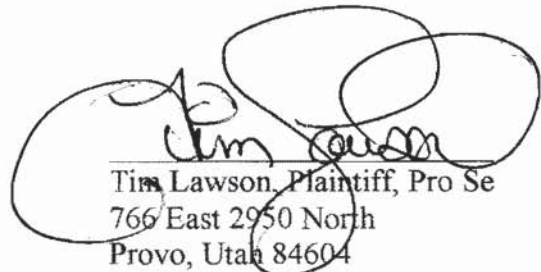
23. Hatch at all times acted in his capacity as an elected official when he knowingly and intentionally made contracts in which he had a financial interest that benefitted him directly and indirectly as he underfunded the FDA.

CONCLUSION

Lawson prays for damages in the amount necessary to properly fund the FDA so that products labeled Gluten Free do not contain dangerous amounts of gluten.

Lawson prays for damages in an amount necessary to compensate him for his personal injury as a result of Hatch's actions.

Respectfully Submitted on May 17<sup>th</sup>, 2012.

  
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