

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

**Nathan Roberts and Freedom Truck
Dispatch LLC**, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

**Progressive Preferred Insurance
Company; Progressive Casualty
Insurance Company; Circular Board
LLC**,

Defendants.

Case No. 1:23-cv-01597

Plaintiffs' Class-Action Complaint

Progressive Preferred Insurance Company provides commercial insurance to commercial trucking and delivery companies. It also engages in patently unlawful racial discrimination by offering a \$25,000 “grant” to 10 “Black-owned small businesses to use toward the purchase of a commercial vehicle.” Progressive does not permit non-black-owned small businesses to even apply for the grant. Plaintiffs Nathan Roberts and Freedom Truck Dispatch bring suit to enjoin Progressive from continuing these racially discriminatory practices and recover classwide damages on behalf of everyone who has suffered unlawful racial discrimination on account of this program.

JURISDICTION AND VENUE

1. The Court has subject-matter jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1343.

2. Venue is proper because a substantial part of the events giving rise to the claims occurred in this judicial district. *See* 28 U.S.C. § 1391(b)(2).

3. Because the plaintiffs reside in Cuyahoga County, assignment to the Eastern Division is proper. *See* Local Civil Rule 3.8(c).

PARTIES

4. Plaintiff Nathan Roberts is a citizen of Ohio who resides in Cuyahoga County.

5. Plaintiff Freedom Truck Dispatch LLC is an Ohio limited-liability company with its principal place of business in Cleveland, Ohio.

6. Defendant Progressive Preferred Insurance Company is a corporation organized under the laws of Ohio. It can be served at 4400 Easton Commons Way, Suite 125, Columbus, Ohio 43219.

7. Defendant Progressive Casualty Insurance Company is a corporation organized under the laws of Ohio. It can be served at 6300 Wilson Mills Road, Mayfield Village, Ohio 44143.

8. Defendant Circular Board LLC is a limited liability company organized under the laws of Delaware. Circular Board LLC operates Hello Alice, an online resource platform that conspired and partnered with Progressive in administering these racially discriminatory grants.

STATEMENT OF FACTS

9. Defendant Progressive Preferred Insurance Company provides commercial insurance coverage to delivery trucking companies.

10. Plaintiff Nathan Roberts, as sole owner and member of Freedom Truck Dispatch LLC, obtained a commercial policy from Progressive Preferred Insurance Company on October 17, 2022.

11. On May 24, 2023, Progressive Preferred Insurance Company emailed Mr. Roberts about a grant opportunity for their commercial-trucking small-business owners. *See* Exhibit 1. The grant was offered through defendant Progressive Casualty Insurance Company, although the e-mail was sent by Progressive Preferred Insurance Company. (We will refer to these defendants collectively as “Progressive.”)

12. Progressive decided that only black-owned businesses would be eligible for these grants. The email states:

Progressive Driving Small Business Forward Fund

We're offering 10 grants of \$25,000 each to Black-owned small businesses to use toward the purchase of a commercial vehicle. Apply to this fund today.

[Apply Today](#)

13. Progressive claims that only black-owned businesses should be eligible for these grants because “studies have shown how inequities have made it harder for Black entrepreneurs to access capital. This program aims to alleviate this challenge.” Exhibit 2; *see also* <https://helloalice.com/grants/progressive> (last visited on August 16, 2023) [<https://perma.cc/65S7-7W6V>].

14. Grant recipients must use the money toward the purchase of a commercial vehicle and must “have a clear plan for growth as a result of this vehicle purchase.” Exhibit 3; *see also* bit.ly/3YDOGwg (last visited on August 16, 2023). This makes the grant into a contract supported by mutuality of obligation and consideration.

15. Progressive’s grant program therefore discriminates against non-black-owned businesses in violation of 42 U.S.C. § 1981.

16. Hello Alice, an online resource platform operated by defendant Circular Board LLC, partnered and conspired with Progressive to violate 42 U.S.C. § 1981

with this racially discriminatory grantmaking. *See* Exhibit 3; Exhibit 4. Hello Alice also partners and conspires with other entities to violate 42 U.S.C. § 1981. *See* Exhibits 5–7.

FACTS RELATED TO STANDING

17. After receiving the email attached as Exhibit 1, Nathan Roberts did not realize the grant was available only for black-owned small businesses.

18. Nathan Roberts opened the application and began filling it out.

19. Eventually, he came to a part of the application that made clear that the grants were available only to black-owned businesses, so he closed the application and did not apply because he is white and his business is white-owned.

20. Nathan Roberts, on behalf of himself and Freedom Truck Dispatch LLC, wishes to apply for the grant and is “able and ready to apply.” *See Carney v. Adams*, 141 S. Ct. 493, 499–500 (2020); *Gratz v. Bollinger*, 539 U.S. 244, 261 (2003).

21. Mr. Roberts is white and therefore ineligible for the \$25,000 grant that Progressive will award to black-owned small businesses.

22. Mr. Roberts is suffering past and future injury in fact because he was barred from applying for this grant, and he cannot apply to become a grant recipient without subjecting himself to racial discrimination.

23. Mr. Roberts cannot apply for the grant until Progressive and Circular Board LLC eliminate this racially discriminatory requirement.

24. Mr. Roberts’s injuries are traceable to the allegedly unlawful behavior of Progressive and Circular Board LLC, who are operating a racially discriminatory grant program, and those injuries will be redressed by the damages and prospective relief sought in this lawsuit.

25. Mr. Roberts seeks to represent a class of all individuals who were or are “able and ready” to apply to Progressive’s “Driving Small Business Forward” grant program

and have been or would be subjected to racial discrimination on account of the defendants' behavior.

CLASS ALLEGATIONS

26. Mr. Roberts brings this class action under Fed. R. Civ. P. 23(b)(1)(A), (b)(1)(B), (b)(2), and (b)(3). The class includes all individuals who were or are "able and ready" to apply to Progressive's "Driving Small Business Forward" grant program, and have been or would be subjected to adverse racial discrimination on account of the defendants' behavior. The class includes everyone who has ever fallen within this definition, including anyone who comes within the class definition at any time before the conclusion of this action.

27. The number of persons in the class makes joinder of the individual class members impractical. The plaintiffs estimate that the class members number in the hundreds.

28. There are questions of fact and law common to all class members. Factually, all class members are potential applicants to Progressive's "Driving Small Business Forward" grant program who have been or would be subjected to adverse racial discrimination. Legally, federal civil-rights laws, including 42 U.S.C. § 1981, afford the same rights to every member of the class.

29. Mr. Roberts's claims are typical of other class members, as each class member has been subjected to racial discrimination in violation of 42 U.S.C. § 1981.

30. Mr. Roberts adequately represents the interests of his fellow class members, and he has no interests antagonistic to the class.

31. A class action can be maintained under Rule 23(b)(1)(A) because separate actions by class members risks inconsistent adjudications on the underlying legal issues.

32. A class action can be maintained under Rule 23(b)(1)(B) because an adjudication determining the legality of Progressive's "Driving Small Business Forward"

grant program under 42 U.S.C. § 1981 will, as a practical matter, be dispositive of the interests of all class members.

33. A class action can be maintained under Rule 23(b)(2) because the defendants have acted on grounds that apply generally to the class, so that final injunctive relief or corresponding declaratory relief is appropriate respecting the class as a whole.

34. A class action can be maintained under Rule 23(b)(3) because the common questions of law and fact identified in the complaint predominate over any questions affecting only individual class members. A class action is superior to other available methods for the fair and efficient adjudication of the controversy because all class members are subjected to the same violation of their federal rights, and the amount of money involved in each individual's claim would make it burdensome for class members to maintain separate actions.

CAUSE OF ACTION

35. 42 U.S.C. § 1981 prohibits Progressive from engaging in racial discrimination in the making and enforcement of contracts.

36. Progressive has violated and is violating 42 U.S.C. § 1981 by awarding \$25,000 grants to black-owned small businesses, while withholding this benefit from all other races.

37. Hello Alice has violated and is violating 42 U.S.C. § 1981 by conspiring and partnering with Progressive in administering these racially discriminatory grants and withholding these grants from non-black-owned businesses.

38. 42 U.S.C. § 1981 provides Mr. Roberts with a private right of action to sue for both damages and prospective relief. *See Johnson v. Railway Express Agency, Inc.*, 421 U.S. 454, 459–60 (1975).

DEMAND FOR RELIEF

39. Mr. Roberts respectfully requests that the court:

- a. certify the class described in paragraphs 25 and 26;
- b. declare that Progressive is violating 42 U.S.C. § 1981 by excluding all races from the \$25,000 grant that it provides to black-owned small businesses;
- c. enjoin Progressive from discriminating against or giving preferential treatment to any person or entity on account of race;
- d. award nominal, compensatory, and punitive damages against each of the defendants;
- e. award costs and attorney's fees; and
- f. award all other relief that the Court deems just, proper, or equitable.

Respectfully submitted.

/s/ Joseph P. Ashbrook

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* *pro hac vice* applications forthcoming

*Counsel for Plaintiffs and
the Proposed Class*

Dated: August 16, 2023



AFL Equality <equality@aflegal.org>

Fwd: \$25,000 grants available for small business owners.

Nathan Roberts <nate@freedomtruckdispatch.com>
To: equality@aflegal.org

Wed, May 24, 2023 at 12:59 PM

----- Forwarded message -----

From: **Progressive** <progressivecommercial@e.progressive.com>
Date: Tue, May 23, 2023 at 8:20 PM
Subject: \$25,000 grants available for small business owners.
To: <nate@freedomtruckdispatch.com>



Supporting small businesses owners

With two grant funds supported by Progressive



We're proud to support small business owners with two exciting grant funds hosted by Hello Alice.

Progressive Driving Small Business Forward Fund

We're offering 10 grants of \$25,000 each to Black-owned small businesses to use toward the purchase of a commercial vehicle. Apply to this fund today.

[Apply Today](#)

Small Business Growth Fund

This fund provides small business owners of all backgrounds the opportunity to receive a \$5,000 to \$25,000 grant. The next application period for this fund starts June 12, 2023. [Learn more about how to apply](#) after the application period begins.

Next steps—share & apply today

We're currently taking applications for the Progressive Driving Small Business Forward Fund. Please share this opportunity with a friend or fellow business owner—applicants don't need to be Progressive customers to apply!



Your Agent

CUI Agency LLC
CUI@CUIAGENCY.COM
801-352-1161

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NATHAN ROBERTS
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Policy underwritten by Progressive Preferred Insurance Company

Advertisement from
United Financial Casualty Company
6300 Wilson Mills Rd, Mayfield Village, OH 44143

NO PURCHASE NECESSARY TO ENTER OR WIN. The Driving Small Business Forward grant program is open to legal residents of the 50 U.S. states and D.C., 18 and older (19 and older in AL and NE). Begins on April 24, 2023, at 9 a.m. ET and ends on June 2, 2023, at 6 p.m. ET. To enter, visit <http://hialice.co/progressive>. Limit one entry per entrant/officer. Void where prohibited. For complete rules, go to https://pgrs.in/Hi_Alice. Sponsor: Circular Board, Inc. dba Hello Alice, in coordination with Progressive Casualty Ins. Co., 6300 Wilson Mills Road, Mayfield Village, OH 44143.

Marketing_CL_Hello_Alice_10.0

Driving Small Business Forward: \$25K Grants

The Progressive® Driving Small Business Forward fund program will provide \$25,000 towards a commercial vehicle to 10 Black-owned small businesses.

Progressive Commercial is the #1 commercial auto insurer in America¹ and is committed to serving small businesses. Multiple studies have shown how inequities have made it harder for Black entrepreneurs to access capital. This program aims to alleviate this challenge.

¹ No. 1 commercial auto insurer from SNL Financial's 2022 national written premium data.



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Driving Small Business Forward Grants 2023



Artist Grant to support Professional and Artistic Development in Delaware

The [Progressive](#)® Driving Small Business

Forward fund program will provide \$25,000

towards a [commercial](#) vehicle to 10 [Black-](#)

owned small [businesses](#).



Apply now for

Donor Name: Hello Alice

State: All States

County: All Counties

Type of Grant: Grant

Deadline: 06/02/2023

Size of the Grant: \$25,000

Details:

Progressive Commercial is the 1 commercial auto insurer in America¹ and is committed to serving small businesses. Multiple studies have shown how inequities have made it harder for Black entrepreneurs to access capital. This program aims to alleviate this challenge.

Eligibility Criteria

Individual Artist Fellowship (Nebraska)



2024 Human Service Grant Program – Delaware



The Louise R. Lester Foundation Grant Program 2023 (Virginia)



Equity-Focused Leadership Grants

Applicants must meet all of the below criteria to be eligible for this opportunity:

- Be a for-profit business majority (51%+) owned and operated by a Black-identifying entrepreneur(s)
- Have 10 or fewer employees and less than \$5M in annual gross revenue
- Have a demonstrated need for a qualifying commercial vehicle to run your business and a clear plan for growth as a result of this vehicle purchase
- Not be an independent contractor whose primary business is for a rideshare service such as Uber or Lyft, or third-party food delivery such as UberEats, [DoorDash](#), PostMates, Grubhub, Instacart, etc.
- No purchase necessary. 18+, US only.

for Colorado-based Nonprofits



Bonfils-Stanton Foundation Capital Grants Program in Colorado



Funding available for General Operating and Project Support in Colorado



El Paso County

For more information, visit [Hello Alice](#).

Looking for Grants? Become a Member to search and filter grant information and receive latest grant alerts in your email inbox. [Learn more](#).

Community Services Block Grant (CSBG) Program



Grants to preserve Agriculture-supporting Organizations in Maryland

Artist Grant to support Professional and Artistic Developer in Delaware

The Louise R. Lester Foundation Grant Program 2023 (Virginia)

Michigan: Wastewater Infrastructure Fund Grants



Michigan: Wastewater Infrastructure Fund Grants

Grants for Black-led and

City of Chicago ETOD Developer

USDA/RBCS Evaluation of Rural



Black-serving Nonprofit Organization in Ohio

Grants Program (Illinois)

Developer Investments in Food Supply Chains

Texans Feeding Texans – Surplus Agricultural Products Grant Program

West Orange Foundation Grant Program 2023 (New Jersey)

EPA: Methodolog and Tools to support Climate-Resilience Communitie Training Modules, and Modeling

City of Scranton Small Business Start Up or Expansion Grant Program – Pennsylvania



2024 Barton County Community Foundation Grant Program – Missouri



2024 Beckmann Emerging Artist Fellowship – Indiana

City of Scranton Wage Boost Grant Program – Pennsylvania

Small Business Recovery Grant Program – Pennsylvania

Philadelphia Local News Sustainability Initiative – Pennsylvania



**City of
Elizabeth
Façade
Rehabilitatio
Grant
Program
(Tennessee)**

**2023-
2024
Artist
Support
Grant
Program
(North
Carolina)**

**John
and
Sandra
Mayfield
Family
Economic
Developer
Fund in
California**



**2024 City of
Bellingham
Tourism Grant
Program –
Washington**



**2024 Scrap Tire
Market
Development
Program –
Michigan**

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Progressive Insurance®, Hello Alice Now Accepting Applications for \$250,000 Grant Program for Black Small Business Owners



Progressive Insurance[®], Hello Alice Now Accepting Applications for \$250,000 Grant Program for Black Small Business Owners

10 recipients will receive funds to use toward the purchase of a commercial vehicle for their business

MAYFIELD VILLAGE, Ohio, May 4, 2023 /[PRNewswire](#)/ --

[Progressive Insurance](#)[®], the leading commercial auto insurer in the United States, today announced they are taking applications for the brand's Driving Business Forward grant program in support of Black entrepreneurs. Each of the 10 small business owners selected will be awarded a \$25,000 grant to use toward the purchase of a commercial vehicle for their business.

While 20 percent of Black Americans start businesses, only four percent of these businesses survive the startup stage due in large part to the difficulty Black business owners have in accessing financing, according to [McKinsey & Company](#). With the Driving Business Forward grant program, Progressive is extending support to help close these gaps for Black entrepreneurs and elevate their businesses.

To administer the grant program, Progressive is working with [Hello Alice](#), the financial technology organization helping over one million small businesses access capital.

"At Progressive we recognize the challenges that small business owners are faced with each and every day," said Karen Bailo, Commercial Lines President at Progressive Insurance.

"Our hope is this program will provide some assistance to Black entrepreneurs as they navigate their small business journey and help them combat any barriers."

Progressive and Hello Alice remain committed to investing in inclusive entrepreneurship, so all Americans with an entrepreneurial spirit can access the funding, tools, and

"We are so excited to work with Progressive again this year and host the Driving Small Business Forward Grant Program," said Elizabeth Gore, Co-founder and President of Hello Alice.

"Recipients will be able to drive their business forward with the capital needed to purchase a commercial vehicle."

Applications are now open for one of 10, \$25,000 grants to be used toward the purchase of a commercial vehicle. Those eligible will need to sign up for a free Hello Alice account and complete their application. The deadline for applications is June 2, 2023, at 6 p.m. ET. Applications will be reviewed by a committee according to the criteria outlined in the terms and conditions. Recipients will be notified via email and publicly announced in August. For full eligibility requirements, including restricted businesses, see the [Terms & Conditions](#).

To apply and learn more about the program, visit <https://helloalice.com/grants/progressive>.

Progressive originally [launched](#) this program in 2022, aiming to support diverse small business owners across the country, and awarded 10 Hispanic business owners each with a \$25,000 grant to help propel their small business. The brand is continuing to expand opportunities for small businesses through the support of the Hello Alice Small Business Growth Fund, which awards grants to small business owners of all backgrounds and ethnicities. Inclusive of the 2023 program, Progressive has committed a total of \$600,000 towards small businesses in partnership with Hello Alice.

About Progressive

Progressive Insurance® makes it easy to understand, buy and use [car insurance](#), [home insurance](#), and other protection needs. Progressive offers choices so consumers can reach us however it's most convenient for them — online at [progressive.com](#), by phone at 1-800-PROGRESSIVE, via the Progressive mobile app, or in-person with a local agent.

Progressive provides insurance for personal and commercial autos and trucks, motorcycles, boats, recreational vehicles, and homes; it is one of the leading sellers of personal and [commercial](#) auto, [motorcycle](#), and [boat](#) insurance in the country, and one of the top 15 homeowners insurance carriers.

Founded in 1937, Progressive continues its long history of offering shopping tools and services that save customers time and money, like Name Your Price®, Snapshot®, and HomeQuote Explorer®.

The Common Shares of The Progressive Corporation, the Mayfield Village, Ohio-based holding company, trade publicly at NYSE: PGR.

About Hello Alice

Hello Alice, a fintech providing credit, loans and grants, is a free platform serving more than one million small business owners across the United States. Committed to equitable access to capital for the New Majority - women, people of color, members of the LGBTQ+ community, veterans, and entrepreneurs with disabilities, Hello Alice offers funding, education, tools, and curated opportunities. Working with enterprise business services, ecosystem partners, affiliates, and government agencies, Hello Alice provides its growing community with everything they need to grow their

businesses. Hello Alice serves a diverse community of business owners across the country. Approximately 68% of owners are BIPOC, 63% are female, and 17% are military-affiliated. For small business owners interested in joining the Hello Alice community, they can sign up for free at www.helloalice.com.

To learn more, visit www.helloalice.com, as well as [Twitter](#), [LinkedIn](#), [Instagram](#), and [Facebook](#).

SOURCE Progressive Insurance

For further information: Mike Ferrari, Progressive Insurance, 440.478.4563, Michael_R_Ferrari@progressive.com

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Latest Grants

Applications Open for Democratizing the Friends and Family Grant (New York)



Artist Grant to support Professional and Artistic Development in Delaware



Apply now for

Project Entrepreneur, a program by UBS, aims to level the playing field for female founders by providing access to the resources, [training](#), and

networks they need to **build** and grow their **companies**.

Donor Name: Hello Alice

State: New York

Boroughs: Bronx, Brooklyn, Manhattan, Queens, and/or Staten Island

Type of Grant: Grant

Deadline: 03/03/2023

Size of the Grant: \$25,000

Details:

The Democratizing the Friends and **Family**

Round (2023) (the “Program”) is sponsored

and administered by Circular Board, Inc. dba

Hello Alice (“Sponsor”). By entering this

Program, you agree to be bound by these

Individual Artist Fellowship (Nebraska)



2024 Human Service Grant Program – Delaware



The Louise R. Lester Foundation Grant Program 2023 (Virginia)



Equity-Focused

Terms and Conditions and Sponsor's

determinations regarding the Program, which are final and binding. The Program is subject to all applicable federal, state, and local laws and is void where prohibited. There is no purchase necessary or other cost to enter the Program or win a Grant.

Funding Information

Each Founder that is a Grant Recipient will receive a \$25,000 (USD) grant to be used for the benefit of Finalist's Company.

Eligibility Criteria

To be eligible to enter a company in the Program, you ("Officer") must be all of the following as of the first day of the Program Period (defined below):

Leadership Grants for Colorado- based Nonprofits



Bonfils-Stanton Foundation Capital Grants Program in Colorado



Funding available for General Operating and Project Support in Colorado



El Paso County

- an entrepreneur who is the leading executive (i.e. Founder and/or President, CEO, CFO, COO, or any such other similar title) of a company that meets the below business criteria;

- a legal resident of one of the fifty United States, the [District of Columbia](#), or [Puerto Rico](#);

- a current resident of NYC (defined as residing within the official zip codes of the five boroughs of Bronx, Brooklyn, Manhattan, Queens, and/or Staten Island); and

- eighteen (18) years of age or older (19 in AL and NE).

- To be eligible to participate in the program, the company (“Entrant”) must meet all of the following criteria as of the first day of

**Community
Services Block
Grant (CSBG)
Program**



**Grants to preserve
Agriculture-
supporting
Organizations in
Maryland**



**Michigan:
Wastewater
Infrastructure
Fund Grants**



the Program Period:

- Be a for-profit company located and registered in NYC (defined as residing within the official zip codes of the five boroughs of Bronx, Brooklyn, Manhattan, Queens, and/or Staten Island); Have at least one woman-identifying founder of color;
 - Have a venture-scalable or venture-viable product or idea;
 - Have a demonstrated need for funds;
- AND
- Must be willing to participate in a coaching program as well as attend an in-person accelerator at UBS's NYC headquarters (defined below under "Summary of Grants").
- The potential winners are subject to

**Texans Feeding
Texans – Surplus
Agricultural
Products Grant
Program**



**2024 Barton
County
Community
Foundation Grant
Program –
Missouri**



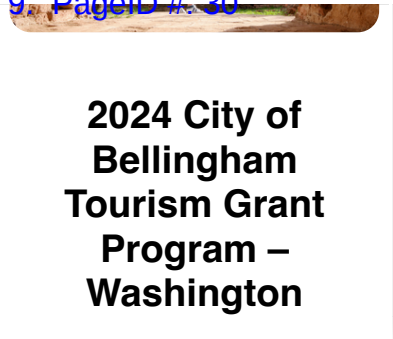
**2024 Beckmann
Emerging Artist
Fellowship –
Indiana**



verification of eligibility by Sponsor, which may include completing associated documentation.

For more information, visit [Democratizing the Friends & Family](#).

Looking for Grants? Become a Member to search and filter grant information and receive latest grant alerts in your email inbox. [Learn more](#).



<p>EPA: Methodolog and Tools to support Climate- Resilience Communitie Training Modules, and</p>	<p>HRSA: Early Hearing Detection and Intervention State/Territc Program</p>	<p>OJJDP: 2023 Subgrants Program for State and Local Court Appointed Special Advocates</p>

Modeling

Organizational

**EPA:
Tribal
Support
for E-
Enterprise
for the
Environment
2024-
2029**

**Applications
open
for
BIPOC
Deaf
Arts
Grant
Program
2023**

**2024
Widening
the
Pipeline
Fellowship
for
Journalists
of
Color**

**2023
Local
and
Regional
Healthy
Food
Financing
Partnership
Program**

**ACF:
2023
Support
for
Trauma-
Affected
Refugees
(STAR)
Program**

**DOE:
Puerto
Rico
Energy
Resilience
Fund
(PR-
ERF)**

**Nextdoor
Kind**

**Apply
now for**

**2024
Create**

**Foundation
Keep it
Local
Business
Fund**

**Youth
as
Solutions
(YaS)
Program**

**Change
Fellowship
for
Artists
and
Cultural
Producers
in New
York**

**Submit
Applications
for
Artists
in
Business
Leadership
Fellowship
2024**

**Institute
of
Education
Sciences
(IES):
National
Center
for
Education
Research
(NCER)
Education
Research**

**USDA/FNS:
Food
Distribution
Program
on
Indian
Reservation
Produce
Training
Program**



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Latest Grants

BGE Energizing Small Business Grants in Maryland



Artist Grant to support Professional and Artistic Development in Delaware



Apply now for

In 2023, the BGE Energizing Small Business grant program, presented in partnership with Hello Alice and the Global [Entrepreneurship Network \(GEN\)](#), is offering funding to help

central **Maryland businesses** succeed and thrive.

Donor Name: Hello Alice

State: Maryland

County: Selected Counties

Type of Grant: Grant

Deadline: 03/24/2023

Size of the Grant: \$20,000

Details:

BGE’s Energizing Small Business Grant

Program (the “Program”) is sponsored and

administered by Circular Board, Inc. dba Hello

Alice and the Global Entrepreneurship

Network, Inc. (GEN) (“Sponsors”).

Individual Artist Fellowship (Nebraska)



2024 Human Service Grant Program – Delaware



The Louise R. Lester Foundation Grant Program 2023 (Virginia)



Equity-Focused

Funding Information

Grant Recipients will receive a \$20,000 (USD) grant to be used for the Grant Recipient's business expenses.

Eligibility Criteria

- Applicants must be a for-profit business and an existing BGE electric and/or gas customer with positive BGE credit history.

Hello Alice values [diversity](#), [equity](#) and [inclusion](#) so preference will be given to

minority-owned and woman-owned businesses. Other eligibility criteria

include:

- For-profit business founded in 2021 or prior
- In good standing (or on the way to) with the State of Maryland

Leadership Grants for Colorado- based Nonprofits



Bonfils-Stanton Foundation Capital Grants Program in Colorado



Funding available for General Operating and Project Support in Colorado



El Paso County

- A maximum of twenty-five (25) employees
- Annual gross revenues in 2022 of less than \$7 million USD
- Demonstrated need for funding to support business and serve customers

For more information, visit [BGE Energizing](#).

Looking for Grants? Become a Member to search and filter grant information and receive latest grant alerts in your email inbox. [Learn more](#).

Community Services Block Grant (CSBG) Program



Grants to preserve Agriculture-supporting Organizations in Maryland



Michigan: Wastewater Infrastructure Fund Grants



USDA/RBCS Evaluation of Rural

Nominations open for 2024

Civic Discourse and Community

Developer Investments in Food Supply Chains

Alan T. Waterman Award

Voices Fund to enable Local News Experiments

Texans Feeding Texans – Surplus Agricultural Products Grant Program



Request for Proposals for 2023 Elevate Initiative

2024 Widening the Pipeline Fellowship for Journalists of Color

2024 Call for Applications for Downtown Revitalization Grant Program – Maryland

2024 Barton County Community Foundation Grant Program – Missouri



Town of Perryville Business Developer Grant Program – Maryland

2023 Give Back Grant (GBG) for BIPOC Women

Apply now for America’s Long-Term Care Crisis Reporting Fellowship

2024 Beckmann Emerging Artist Fellowship – Indiana



**2023-24
Research
Publication
Grants
in
Engineering
Medicine
&
Science**

**Submit
Application:
for
American
Fellowships
Program**

**AAUW
Career
Developer
Grants
on
Education
for
Women**

**2024 City of
Bellingham
Tourism Grant
Program –
Washington**



**Submit
Applications
for
Lowe's
Foundation
Gable
Grants
Program**

**2024
EAN
Program
for
Black
and
Latino
Entrepreneu**

**OPE/HEP/FI
HBCUs,
TCCUs,
and
MSIs
Research
and
Developer
Infrastructu
Grant
Program**

**2024 Scrap Tire
Market
Development
Program –
Michigan**



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Latest Grants

The Catalyst Fund for Black-identifying Entrepreneurs



Artist Grant to support Professional and Artistic Development in Delaware

In partnership with Global [Entrepreneurship Network \(GEN\)](#) and [Hello Alice, Mastercard](#) is awarding \$5K grants to [Black](#) entrepreneurs based in Atlanta, Birmingham, Dayton, Los



Apply now for

Angeles, New Orleans, [New York City](#), St.

Louis, and [Washington](#), D.C. to help them

achieve their next milestone.

Donor Name: Hello Alice

State: Selected States

Cities: Selected Cities

Type of Grant: Grant

Deadline: 03/31/2023

Size of the Grant: \$5K

Details:

The Catalyst Fund (the “Program”) is sponsored and administered by Circular Board, Inc. dba Hello Alice, Mastercard and the Global Entrepreneurship Network, Inc. (GEN) (“Sponsors”).

Individual Artist Fellowship (Nebraska)



2024 Human Service Grant Program – Delaware



The Louise R. Lester Foundation Grant Program 2023 (Virginia)



Equity-Focused Leadership Grants

Eligibility Criteria

Mastercard will award \$175,000 in grants to Black entrepreneurs across the United States.

To be eligible, applicants must:

- Be a for-profit business located in Atlanta, Birmingham, Dayton, Los Angeles, New Orleans, New York City, St. Louis, and/or Washington, D.C.
- Be majority-owned (51+%) by a Black-identifying entrepreneur
- Have between 1 and 10 employees (including yourself)
- Have a clear plan for how the funds would help achieve a business milestone

For more information, visit [The Catalyst Fund](#).

Looking for Grants? Become a Member to

for Colorado-based Nonprofits



Bonfils-Stanton Foundation Capital Grants Program in Colorado



Funding available for General Operating and Project Support in Colorado



El Paso County

search and filter grant information and receive latest grant alerts in your email inbox. [Learn more.](#)

Community Services Block Grant (CSBG) Program



Grants to preserve Agriculture-supporting Organizations in Maryland

USDA/RBCS Evaluation of Rural Development Investments in Food Supply Chains

John and Sandra Mayfield Family Economic Development Fund in California

Grants for Non-profit Organizations supporting Youths in California



Michigan: Wastewater Infrastructure Fund Grants

Funding available for Disaster Preparedness Projects in California

Apply now for LaunchKC Grants Competitor 2023 (Missouri)

2023-2024 City of Alameda Façade Grant Program (California)



**2023
Give
Back
Grant
(GBG)
for
BIPOC
Women**

**2024
EAN
Program
for
Black
and
Latino
Entrepreneu**

**2023
Transform
Business
Grants
to
support
Individuals
and
Groups**

**Texas Feeding
Texans – Surplus
Agricultural
Products Grant
Program**



**2024 Barton
County
Community
Foundation Grant
Program –
Missouri**

**City of
Concord
ARPA
Small
Business
Reimbursen
Grant
Program
(California)**

**DOE:
Puerto
Rico
Energy
Resilience
Fund
(PR-
ERF)**

**Request
for
Applications
for
Organic
Transition
Pilot
Grant
Program
–
California**



**2024 Beckmann
Emerging Artist
Fellowship –
Indiana**

**Nextdoor
Kind
Foundation'
Keep it
Local
Business
Fund**

**2023
Port of
Seattle
Business
Accelerator
Program
–**

**Small
Things,
Big
Impacts
Fund
for
Businesses**



Washington

**and
Non-
profit
Organizations
in New
York**



**2024 City of
Bellingham
Tourism Grant
Program –
Washington**



**2024 Scrap Tire
Market
Development
Program –
Michigan**

We use essential cookies to make our site work. With your consent, we may also use non-essential cookies to improve user experience, personalize content, customize advertisements, and analyze website traffic. For these reasons, we may share your site usage data with our social media, advertising, and analytics partners. By clicking "Accept," you agree to our website's cookie use as described in our [Cookie Policy](#). You can change your cookie settings at any time by clicking "[Preferences](#)."

Preferences

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Accept

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Nathan Roberts and Freedom Truck Dispatch LLC, on behalf of themselves and all others similarly situated

(b) County of Residence of First Listed Plaintiff Cuyahoga (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Joseph P. Ashbrook, Julie E. Byrne, Ashbrook Byrne Kresge LLC P.O. Box 8248, Cincinnati, OH 45249; Gene P. Hamilton, Nicholas R. Barry, America First Legal Foundation, 611 Pennsylvania Avenue SE #231, Washington, DC 20003, (202) 964-3721

DEFENDANTS

Progressive Preferred Insurance Company; Progressive Casualty Insurance Company; Circular Board LLC

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. § 1981, 28 U.S.C. § 2201
Brief description of cause: Class-action lawsuit challenging the constitutionality of "fair-share fees" imposed on non-union members

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE August 15, 2023 SIGNATURE OF ATTORNEY OF RECORD /s/ Joseph P. Ashbrook

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

I. Civil Categories: (Please check one category only).

- 1. General Civil
- 2. Administrative Review/Social Security
- 3. Habeas Corpus Death Penalty

*If under Title 28, §2255, name the SENTENCING JUDGE: _____

CASE NUMBER: _____

II. **RELATED OR REFILED CASES.** See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regard for the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action: is **RELATED** to another **PENDING** civil case is a **REFILED** case was **PREVIOUSLY REMANDED**

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III. In accordance with Local Civil Rule 3.8, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant.** If the defendant resides in a county within this district, please set forth the name of such county

COUNTY:

Corporation For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.

(2) **Non-Resident defendant.** If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

COUNTY: Cuyahoga

(3) **Other Cases.** If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

COUNTY:

IV. The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section III, please check the appropriate division.

EASTERN DIVISION

AKRON

(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)

CLEVELAND

(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake, Lorain, Medina and Richland)

YOUNGSTOWN

(Counties: Columbiana, Mahoning and Trumbull)

WESTERN DIVISION

TOLEDO

(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry, Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca VanWert, Williams, Wood and Wyandot)

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.