

AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the

following:

1. My name is Alan Brinkman, and I am 37 years old.

2. I am the owner and manager of The Stop,
located at 1450 S Washington, in Wichita, (or whatever city),
Sedgwick County, Kansas.

3. This affidavit is being submitted in support of the Complaint for Declaratory
and Injunctive Relief.

4. In the course of my business, I take the following measures to mitigate the
spread of COVID-19, and protect my customers and

employees: I Require MASKS for Patrons And Employees.
I Limit Capacity and Encourage Social Distancing.
We Have Hand Sanitizer Stations Throughout the Bar. We
Continue to Clean Throughout the Night.


5. Due to the Emergency Order issued on November 13, 2020, I have had to
close my establishment at 11 p.m. This has had the following adverse financial and
economic impact on my business:

Limiting the hours has decreased Revenue By
Roughly 70%. Due to Decreased Revenues this
has caused hardships to pay and retain staff. We
have been vandalised during our normal operating

Hours which caused a loss of four New
Security Cameras. Valued over a thousand dollars.
Decreased Revenue Has also put a Strain on
Regular monthly Bills associated with maintaining
a Business Such As Rent on the Building.
This Has also Caused extreme Emotional Stress
on Both managing Partners. As we are Struggling
Now to Pay on Personal obligations.

6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.


FURTHER AFFIANT SAYETH NOT.



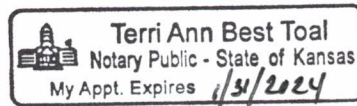
(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 23, 2020 by _____



(Signature of notarial officer)



Expiration Date: 1/31/2024

AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the

following:

1. My name is Apt Acanton, and I am ___ years old.

2. I am the owner and manager of A + J's Musicroom Bart Gill
located at 1602 S. Meridian Ave., in Wichita, (or whatever city),
Sedgwick County, Kansas.

3. This affidavit is being submitted in support of the Complaint for Declaratory
and Injunctive Relief.

4. In the course of my business, I take the following measures to mitigate the
spread of COVID-19, and protect my customers and
employees: _____

See attachment

5. Due to the Emergency Order issued on November 13, 2020, I have had to
close my establishment at 11 p.m. This has had the following adverse financial and
economic impact on my business:

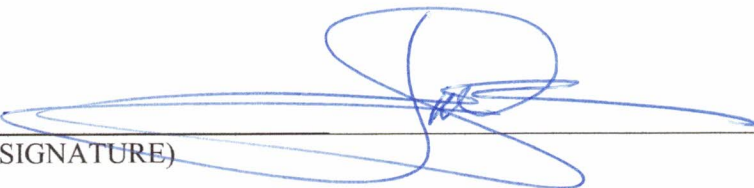
See attachment

4. by tables set six feet apart), no more than 8 people @ a table. Also, staff are completing ~~thorough~~ thoroughly sanitizing tables, chairs, bars, and touchpoints throughout the establishment. Staff are wearing masks. If patrons are not wearing a mask, they will not be served. We also encourage people to use social distancing.

5. we have had a decrease in patrons visiting the establishment because they don't ~~so~~ want to come out for just a little bit of time. The majority of our business, and therefore our income, comes between 11:00 p.m - 2:00 a.m., especially on the weekends. By closing @ 11:00, we are losing income which makes it difficult to pay bills like rent, utilities & payroll that still have to be paid whether we close @ 11:00 or @ 2:00.

6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.

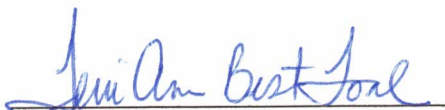
FURTHER AFFIANT SAYETH NOT.



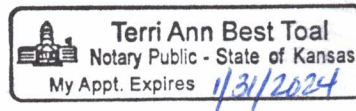
(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 25, 2020 by _____



(Signature of notarial officer)



Expiration Date: 1/31/2024

AFFIDAVIT OF AUGUSTINE JOSEPH IACOPELLI

COMES NOW, November 23rd 2020, being duly sworn, and affirms the following:


1. My name is Augustine Joseph Iacopelli, and I am 42 years old.
2. I am an owner and manager of Augustino Brewing Company along with my spouse Bianca Jean Iacopelli,
located at 756 N Tyler Rd, in Wichita, Sedgwick County, Kansas.
3. This affidavit is being submitted in support of the Complaint for Declaratory and Injunctive Relief.
4. In the course of my business, I take the following measures to mitigate the spread of COVID-19, and protect my customers and employees: Socially distanced tables, available outdoor seating, to-go and curbside sales, frequent cleaning of all surfaces, bathrooms, and front and back of house areas with approved chemical cleaners. We also have available masks and hand sanitizer for use upon request by guests.
5. Due to the Emergency Order issued on November 13, 2020, I have had to close my establishment at 11 p.m. This has had the following adverse financial and economic impact on my business: Our business has dropped by about 15% already since this Emergency Order was issued. While our establishment is not open past 11 p.m., the very calling out of bars and restaurants as spreader locations of COVID-19, without documented evidence or proof in Sedgwick County, has had the effect of scaring off some of our customers who would otherwise be frequenting our establishment. This is very unfair for our local politicians to be negatively impacting our business operations without any due process or evidence of our industry's impact on the spreading of COVID-19. The continuation of orders over the past several months has required us to obtain loans, which

may negatively impact our future solvency and ability to survive once this pandemic has passed. Failure to our ability to survive would place at least 6 employees jobs in jeopardy as well as our family's financial and personal well-being.

6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.

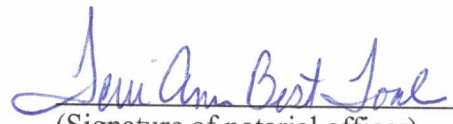
6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.

FURTHER AFFIANT SAYETH NOT.

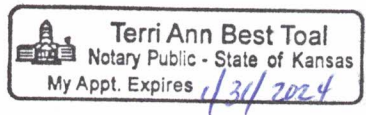

(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 23, 2020 by _____


(Signature of notarial officer)

Expiration Date: 1/31/2024



AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the

following:

1. My name is Bradley J Steven, and I am 40 years old.

2. I am the owner and manager of Club Indigo Old Town LLC dba Industry Old Town located at 126 N Mosley St 67202, in Wichita, (or whatever city), Sedgwick County, Kansas.

3. This affidavit is being submitted in support of the Complaint for Declaratory and Injunctive Relief.

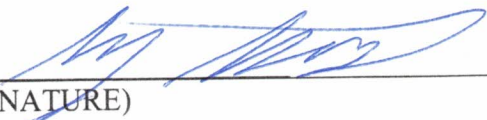
4. In the course of my business, I take the following measures to mitigate the spread of COVID-19, and protect my customers and employees: We have tripled our purchased amounts of sanitizer, gloves and cleaning supplies on a weekly basis. During these periods we focus on cleaning, sanitizing and employee screening which we have continued to use. We have sanitizer set up all around the bar and masks are available to our customers.

5. Due to the Emergency Order issued on November 13, 2020, I have had to close my establishment at 11 p.m. This has had the following adverse financial and economic impact on my business:

Our concept is designed for bar service and with the government restrictions we have had to close down twice we have also been hindered with both the 10pm and 11pm curfews. Sales are at an all time low.

6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.

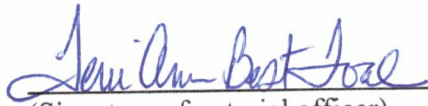
FURTHER AFFIANT SAYETH NOT.



(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 24, 2020 by _____



(Signature of notarial officer)



Expiration Date: 1/31/2024

AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the

following:

1. My name is Chaomin Hsu, and I am 42 years old.

2. I am the owner and manager of Wichita's Bullroom,

located at 4600 W Kellogg Dr, in Wichita, (or whatever city),
67209
Sedgwick County, Kansas.

3. This affidavit is being submitted in support of the Complaint for Declaratory and Injunctive Relief.

4. In the course of my business, I take the following measures to mitigate the spread of COVID-19, and protect my customers and

employees: mask, temperature scan, disinfection,
social distance, disinfec table, plastic cap,
hand sanitizer at visible corner, table,
bathroom, entrance

5. Due to the Emergency Order issued on November 13, 2020, I have had to close my establishment at 11 p.m. This has had the following adverse financial and economic impact on my business:

I lost 80% of income due to close at
11 pm, and 100 capacity.

Series of horizontal lines for writing or drawing.

6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.

FURTHER AFFIANT SAYETH NOT.

Chris White 11-23-2020
(SIGNATURE)

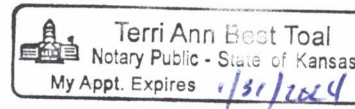
STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 23, 2020 by _____

Terri Ann Best Toal
(Signature of notarial officer)



Expiration Date: 1/31/2024



AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the

following:

1. My name is Dallas Broz, and I am 41 years old.
2. I am the owner and manager of Party Express LLC,
located at 13728 W. Kellogg Dr, in Wichita, (or whatever city),
Sedgwick County, Kansas.
3. This affidavit is being submitted in support of the Complaint for Declaratory
and Injunctive Relief.
4. In the course of my business, I take the following measures to mitigate the
spread of COVID-19, and protect my customers and
employees: Only customers known to each other
Use our services, all of which are private parties.
We Sanitize and clean all vehicles after every trip.

5. Due to the Emergency Order issued on November 13, 2020, I have had to
close my establishment at 11 p.m. This has had the following adverse financial and
economic impact on my business:

Due to a high volume of our customer base
frequenting bars and restaurants for entertainment
we have witnessed a noticeable decline
in business since the emergency orders in SG county.

During this time we have continued to maintain insurance, pay property tax on our physical location, lease payments and all other associated business expenditures. We have been offered no assistance from federal or local government. We have been harmed substantially due to the shutdown orders all while having no cases of Covid or evidence / data to support closures.


6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.

FURTHER AFFIANT SAYETH NOT.

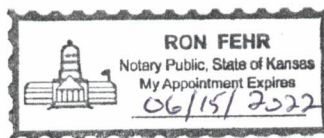

(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 23, 2020 by Dallas Broz


(Signature of notarial officer)

Expiration Date: 06/15/2022



AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the following:

1. My name is Darren Greiving, and I am 39 years old.

2. I am the owner and manager of BLU Nightclub,

located at 8715 W. Maple, in Wichita, (or whatever city),
Sedgwick County, Kansas.

3. This affidavit is being submitted in support of the Complaint for Declaratory and Injunctive Relief.

4. In the course of my business, I take the following measures to mitigate the spread of COVID-19, and protect my customers and

employees: Have followed all Kansas Department of Health guidelines & required mandates/ordinances applicable to us. Furthermore have implemented strict in-house guidelines to limit any contact such

as disposable cups, tong, and sanitab wrs. We have posted signs to direct customers of safety precautions & to ask them to wash hands for 20 seconds. Mask signs posted.

5. Due to the Emergency Order issued on November 13, 2020, I have had to close my establishment at 11 p.m. This has had the following adverse financial and economic impact on my business:

Our business has and is not allowed to operate at the hours that we make the majority of our revenue. This results in running limited staff & contract employees. This has also inhibited our abilities to pay our bills. We have had to drain our savings

in order to stay "in business". We are unsure how much longer we can continue on this path before we run out of resources. The country "permanently tabled" our CARES relief that would displace all of the financial burdens from our shoulders.

6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.


FURTHER AFFIANT SAYETH NOT.



(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 23, 2020 by _____



(Signature of notarial officer)



Expiration Date: 1/31/2024

AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the following:

1. My name is Jeannie Ahrens and I am 54 years old.
2. I am the owner and manager of The Cowboy Inn, located at 642 N. St Paul, in Wichita, (or whatever city), Sedgwick County, Kansas.
3. This affidavit is being submitted in support of the Complaint for Declaratory and Injunctive Relief.

4. In the course of my business, I take the following measures to mitigate the spread of COVID-19, and protect my customers and employees: using only disposable glasswear now housekeeping comes 3 times a week instead of once. Hand sanitizer is sitting out for all to use. Constant cleaning

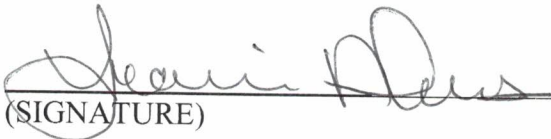
5. Due to the Emergency Order issued on November 13, 2020, I have had to close my establishment at 11 p.m. This has had the following adverse financial and economic impact on my business:

Paying the Bills have been difficult. I just want to feed my family like everyone else I had to close one place last March, The New Stadium, due to the shut downs

It was a live music venue. I had already purchased the Cowboy Inn so I used the shut down to remodel and wait to be open. I spent almost \$60,000 on the remodel and licensing after signing a two year lease with one option. A quarter of my lease was up before I even got to open. And now almost half of my lease is up and I have yet been able to open normal hours. This has caused an unbelievable financial burden. The rent nor bills have been waived or cut.

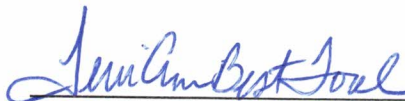
6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.

FURTHER AFFIANT SAYETH NOT.


(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 24, 2020 by _____


(Signature of notarial officer)



Expiration Date: 11/31/2024

AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the

following:

1. My name is Kristi Ivy, and I am 45 years old.

2. I am the owner and manager of The Rusty Nail,

located at 1155 S. Washington, in Wichita, (or whatever city),

Sedgwick County, Kansas.

3. This affidavit is being submitted in support of the Complaint for Declaratory and Injunctive Relief.

4. In the course of my business, I take the following measures to mitigate the spread of COVID-19, and protect my customers and

employees: attached

5. Due to the Emergency Order issued on November 13, 2020, I have had to close my establishment at 11 p.m. This has had the following adverse financial and economic impact on my business:

attached

Our team here at The Rusty Nail have gone above and beyond to ensure the safety of our customers, staff, vendors and families by implementing the following measures against Covid 19:

Eco-lab: leading global sanitation and disinfecting company sprays our entire building monthly with a hard surface live pathogen that continually kills off virus, including the Covid-19 pandemic we are facing. They have supplied us with table disinfectants, sanitation sprays and have provided our staff with how often and where all products can be used.

Teamed up with our Cintas suppliers and have an in-house wall system that precisely measures out another round of disinfecting, cleaning solutions and sanitation for all tables, floors, walls etc.

All tables are cleaned and disinfected between each use. Along with all menus, condiments etc. that may have come in contact with a customer or staff member.

We have removed over (20) twenty seats and have removed any tables that are not able to be maintained at (6) six feet safe distance.

Have wall mounted hand sanitizer stations along with bottles for customer/staff use throughout the entire building.

We replace all rugs weekly and all floors are sanitized before each shift.

Hired an outside cleaning staff to clean restrooms daily and to sanitize all hard surfaces every hour.

Staff is mandated to wear masks at all times and gloves when required.

All patrons entering, standing etc. must adhere to mask mandates at all times.

Our kitchen is provided with an extra level of sanitation/disinfection which they use every single wipe down of their stations.

We quarantine and test any employee that may have been remotely in contact with anyone with a positive Covid-19 test.

Our staff and customers are family to us! We want each and every one of them to remain healthy and feel that we have gone above and beyond the needed to steps to maintain that level.

As of November 13th emergency order The Rusty Nail has experienced a loss of over \$23K. That is over a \$2100 per day. We are currently asking for voluntary layoffs and mandating layoffs to half, if not more, of our (30) thirty staff members soon if these hours remain limited.

Over 70% of our staff members rely almost solely on their wages here at The Rusty Nail. We have a very strong and loyal family with a very low turn-over rate. Any layoffs will ultimately affect this as each one of our employees will need to find outside, possibly permanent, work to maintain their households. Some if not most of our employees do not have unemployment benefits to fall back on. We will lose some of our best workers, creating future hardships for our very new company.

The Rusty Nail is a baby in the bar/restaurant business and these types of financial hardships, future uncertainty with staying open and hours is something we may not be able to survive. My business partner and I have invested our entire livelihoods and every ounce of energy into building this business from the ground up. We financially/emotionally can not survive staying open limited hours or the possibilities of being shut down again.

6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.


FURTHER AFFIANT SAYETH NOT.



(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 24, 2020 by _____



(Signature of notarial officer)



Expiration Date: 1/31/2024

AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the

following:

1. My name is Kyle Okumura, and I am 31 years old.

2. I am the owner and manager of Revolution Lounge,
located at 233 N. Mosley St., in Wichita, (or whatever city),
Sedgwick County, Kansas.

3. This affidavit is being submitted in support of the Complaint for Declaratory
and Injunctive Relief.

4. In the course of my business, I take the following measures to mitigate the
spread of COVID-19, and protect my customers and

employees: Revolution Lounge has incorporated that all employees wear face coverings during their shift. Posted signage requiring
customers to wear protective face coverings and refusing entrance to those who don't have a face covering. Hand sanitizing stations have
also been installed through the premises. Seating along the bar has been removed to direct customers to congregate at proper seating areas
where social distancing can be maintained.

5. Due to the Emergency Order issued on November 13, 2020, I have had to
close my establishment at 11 p.m. This has had the following adverse financial and
economic impact on my business:

Due to Revolution Lounge closing at 11 p.m., we have lost upwards of 90% of weekly sales. Business operations have currently seized
as of November 13, 2020 and thus all current employees have been temporarily laid off.

6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.

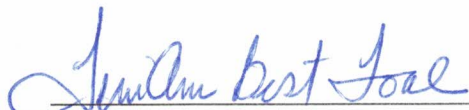
FURTHER AFFIANT SAYETH NOT.



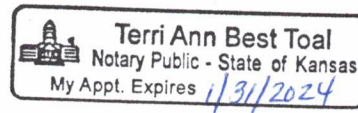
(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 25, 2020 by _____



(Signature of notarial officer)



Expiration Date: 1/31/2024

AFFIDAVIT OF _____

COMES NOW, _____, being duly sworn, and affirms the

following:

STEVEN PETERS

1. My name is ~~_____~~, and I am 43 years old.
2. I am the owner and manager of Vorshay's Cocktail Lounge located at 417 E Douglas Ave., in Wichita, (or whatever city), Sedgwick County, Kansas.
3. This affidavit is being submitted in support of the Complaint for Declaratory and Injunctive Relief.

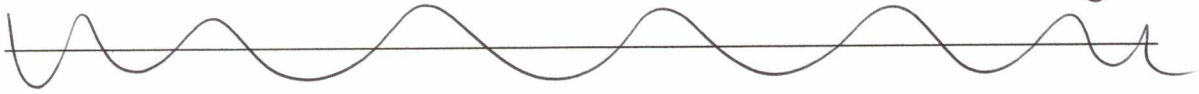
4. In the course of my business, I take the following measures to mitigate the spread of COVID-19, and protect my customers and employees: We have stopped live music. We have removed half the furniture and socially distanced the remaining furniture. Hand sanitizers are placed all over bars/tables/restrooms. masks are required by staff and customers. →

5. Due to the Emergency Order issued on November 13, 2020, I have had to close my establishment at 11 p.m. This has had the following adverse financial and economic impact on my business:

Since the restrictions began my sales are down approximately 92%. I have had to lay off several staff members and get rid of amenities at my bar. In the last 2 years 97% of our

#4

We have shut down our dance floor and capacity is at 50%. We also lowered our background music to a volume so low that everyone can have a normal conversation without yelling.



#5

Sales come between the hours of 10pm-2am. We tried opening for lunch, for over a year, but it didn't work. Due to the financial hardship the restrictions have caused we are approximately 4-6 weeks away from closing our doors for good. Before the restrictions were enacted our business was profitable and were from the day the doors reopened. The fact that my business is on the edge of collapse is a direct result of the overreaching restrictions that were/have been unfairly placed on us.

OVER →

5 An example of sales last year vs. current.

Sat. Nov. 23rd 2019 \$5,601.99

Sat. Nov. 21st 2020 \$329.00

6. I was never allowed a hearing or any opportunity to be heard before the Emergency Order of November 13, 2020, went into effect, and became criminally enforceable on or after November 18, 2020, in Sedgwick County, and on or after November 22, 2020, in the City of Wichita.

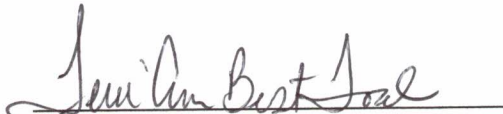
FURTHER AFFIANT SAYETH NOT.



(SIGNATURE)

STATE OF KANSAS
COUNTY OF SEDGWICK

Signed and affirmed before me on November 24, 2020 by _____



(Signature of notarial officer)



Expiration Date: 1/31/2024