

FILED**UNITED STATES DISTRICT COURT**

for the

Eastern District of Missouri

Cape Girardeau Division

OCT - 2 2020
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
CAPE GIRARDEAU

Case No.

1:20 CV 209-ACL

(to be filled in by the Clerk's Office)

Andrew Ostrowski

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

" see attached"

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Andrew Ostrowski
Street Address	131 Winterfeild Cir.
City and County	Cape Girardeau
State and Zip Code	Missouri
Telephone Number	314-737-0527
E-mail Address	a-a-t-c-c@hotmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendants

Office of elections of Hawaii, Lt. Governor Spencer Cox, Director of Elections Gail Fenumiai, Secretary of State Katie Hobbs, Secretary of State Alex Padilla, Governor Gavin Newsom, DC Board of Elections, Secretary of State Brad Raffensperger, Illinois Legislator, Secretary of State Paul Pate, Maryland Board of Elections, Secretary of State Joycelyn Benson, Secretary of State Steve Simon, Secretary of State Corey Stapleton, Secretary of State Robert B. Evnen, Secretary of State Barbara K. Cegavske, Secretary of State Tahesha Way, Secretary of State Maggie Toulouse Oliver, Oklahoma State Election Board, Secretary of Commonwealth Kathy Boockvar, Secretary of State Steve Barnett, Secretary of State Jim Condos, Virginia Department of Elections, Wisconsin Election Commission, Secretary of State Denise W. Merrill, Governor John Carney, Indiana House of Representative and Senate, Commonwealth of Kentucky State Board of Election, Massachusetts State Legislature, Governor Chris Sununu, Governor Andrew M. Cuomo, South Carolina General Assembly, Secretary of State John R. Ashcroft, State of West Virginia

Defendant No. 1

Name	Office of Elections
Job or Title <i>(if known)</i>	
Street Address	802 Lehua Avenue
City and County	Pearl City
State and Zip Code	Hawaii 96782
Telephone Number	(808) 453-VOTE
E-mail Address <i>(if known)</i>	elections@hawaii.gov

Defendant No. 2

Name	Spencer Cox
Job or Title <i>(if known)</i>	Lt. Governor
Street Address	350 North State Street, Suite-220
City and County	Salt Lake City
State and Zip Code	Utah, 84114
Telephone Number	801-538-1041
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Gail Fenumiai
Job or Title <i>(if known)</i>	Director of Elections
Street Address	P.O Box 110017
City and County	Juneau
State and Zip Code	Alaska, 99811
Telephone Number	907-465-4611
E-mail Address <i>(if known)</i>	gail.fenumiai@alaska.gov

Defendant No. 4

Name	Katie Hobbs
Job or Title <i>(if known)</i>	Secretary of State
Street Address	1700 W Washington St Fl 7
City and County	Phoenix
State and Zip Code	AZ, 85007
Telephone Number	602-542-8683
E-mail Address <i>(if known)</i>	

B. Defendant(s) attachment page 1

Defendant No. 5

Name Alex Padilla
Job or Title Secretary of State
Street Address 1500 11th Street
City and County Sacramento
State and Zip Code CA, 95814
Telephone Number 918-657-2166
E-mail Address

Defendant No. 6

Name Gavin Newsom
Job or Title Governor
Street Address 1310 10th Street Suite 1173
City and County Sacramento
State and Zip Code CA, 95814
Telephone Number 916-445-2841
E-mail Address

Defendant No. 7

Name DC Board of Elections
Job or Title
Street Address 1015 Half Street, SE, Suite 750
City and County Washington
State and Zip Code DC, 20003
Telephone Number 202-727-2525
E-mail Address

Defendant No. 8

Name Brad Raffensperger
Job or Title Secretary of State
Street Address 214 State Capitol
City and County Atlanta
State and Zip Code Georgia, 30334
Telephone Number 844-753-7825
E-mail Address

B. Defendant(s) attachment page 2

Defendant No. 9

Name Illinois Legislator

Job or Title

Street Address 301 S.2nd St Ste 112

City and County Springfield

State and Zip Code Illinois 62706

Telephone Number 217-782-6625

E-mail Address

Defendant No. 10

Name Paul Pate

Job or Title Secretary of State

Street Address First Floor, Lucas Building, 321 E. 12th St.

City and County Des Moines

State and Zip Code IA, 50319

Telephone Number 888-767-8683

E-mail Address sos@sos.iowa.gov

Defendant No. 11

Name Maryland Board of Elections

Job or Title

Street Address 151 West Street, Suite 200

City and County Annapolis

State and Zip Code MD, 21401

Telephone Number 410-269-2840

E-mail Address info.sbe@maryland.gov

Defendant No. 12

Name Joycelyn Benson

Job or Title Secretary of State

Street Address 529 S. Main St.

City and County Standish, MI

State and Zip Code 48658

Telephone Number

E-mail Address

B. Defendant(s) attachment page 3

Defendant No. 13

Name Steve Simon

Job or Title Secretary of State

Street Address 180 State Office Building, 100 Rev Dr. Martin Luther King Jr. Blvd.

City and County Saint Paul

State and Zip Code MN, 55155

Telephone Number 651-215-1440

E-mail Address

Defendant No. 14

Name Corey Stapleton

Job or Title Secretary of State

Street Address Montana Capitol Building, Rm 260, P.O Box 202801

City and County Helena

State and Zip Code MT 59620-2801

Telephone Number 406-444-2034

E-mail Address

Defendant No. 15

Name Robert B. Evnen

Job or Title Secretary of State

Street Address 1445 K St, Suite 2300

City and County Lincoln

State and Zip Code NE 68509

Telephone Number 402-471-2554

E-mail Address

Defendant No. 16

Name Barbara K. Cegavske

Job or Title

Street Address 101 North Street, Suite 3

City and County Carson City

State and Zip Code NV, 89701

Telephone Number 775-684-5708

E-mail Address sosmail@sos.nv.gov

B. Defendant(s) attachment page 4

Defendant No. 17

Name The Hon. Tahesha Way

Job or Title Secretary of State

Street Address P.O Box 304

City and County Trenton

State and Zip Code NJ, 08625-0304

Telephone Number 609-292-3760

E-mail Address Feedback@sos.nj.gov

Defendant No. 18

Name Maggie Toulouse Oliver

Job or Title Secretary of State

Street Address 325 Don Gaspar

City and County Santa Fe

State and Zip Code NM, 87501

Telephone Number 505-827-3600

E-mail Address Sos.elections@state.nm.us

Defendant No. 19

Name Oklahoma State Election Board

Job or Title

Street Address 2300 N Lincoln Blvd, Room G28

City and County Oklahoma City

State and Zip Code OK, 73105

Telephone Number 405-521-2391

E-mail Address

Defendant No. 20

Name Kathy Boockvar

Job or Title Secretary of Commonwealth

Street Address 302 North Office Building, 401 North Street

City and County Harrisburg

State and Zip Code PA, 17120

Telephone Number 717-787-6458

E-mail Address

B. Defendant(s) attachment page 5

Defendant No. 21

Name Steve Barnett
Job or Title Secretary of State
Street Address 500 East Capitol Avenue Ste 204
City and County Pierre
State and Zip Code SD, 57501-5070
Telephone Number 605-773-3537
E-mail Address

Defendant No. 23

Name Jim Condos
Job or Title Secretary of State
Street Address 128 State Street
City and County Montpelier
State and Zip Code VT, 05633-1101
Telephone Number 802-828-2148
E-mail Address

Defendant No. 24

Name Virginia Department of Elections
Job or Title
Street Address Washington Building, First Floor, 1100 Bank Street
City and County Richmond
State and Zip Code VA, 23219
Telephone Number 804-864-8901
E-mail Address info@elections.virginia.gov

Defendant No. 25

Name Wisconsin Election Commission
Job or Title
Street Address 212 East Washington Avenue, Third Floor, P.O. Box 7984
City and County Madison
State and Zip Code Wisconsin, 53707-7984
Telephone Number 608-266-8005
E-mail Address Elections@wi.gov

B. Defendant(s) attachment page 6

Defendant No. 26

Name Denise W. Merrill
Job or Title Secretary of State
Street Address State of Connecticut, 165 Capitol Avenue
City and County Hartford
State and Zip Code Connecticut, 06106
Telephone Number 860-509-6200
E-mail Address

Defendant No. 27

Name John Carney
Job or Title Governor
Street Address Carvel State Office Building, 820 N. French Street, 12th Floor
City and County Wilmington
State and Zip Code DE, 19801
Telephone Number 302-577-3210
E-mail Address

Defendant No. 28

Name Indiana House of Representative and Senate
Job or Title
Street Address 200 W. Washington Street
City and County Indianapolis
State and Zip Code IN, 46204-2786
Telephone Number 317-232-9600
E-mail Address

Defendant No. 29

Name Commonwealth of Kentucky State Board of Election
Job or Title
Street Address 140 Walnut Street
City and County Frankfort
State and Zip Code Kentucky, 40601
Telephone Number 502-573-7100
E-mail Address

B. Defendant(s) attachment page 7

Defendant No. 30

Name Massachusetts State Legislature

Job or Title

Street Address Massachusetts State House, 24 Beacon St, Office of the Governor, Room 280

City and County Boston

State and Zip Code MA, 02133

Telephone Number 617-725-4005

E-mail Address

Defendant No. 31

Name Chris Sununu

Job or Title Governor

Street Address 107 North Main Street

City and County Concord

State and Zip Code NH, 03301

Telephone Number 603-271-2121

E-mail Address

Defendant No. 32

Name Honorable Andrew M. Cuomo

Job or Title Governor

Street Address NYS State Capitol Building

City and County Albany

State and Zip Code NY, 12224

Telephone Number 518-474-8390

E-mail Address

Defendant No. 33

Name South Carolina General Assembly

Job or Title

Street Address 1100 Gervais St,

City and County Columbia

State and Zip Code SC, 29201

Telephone Number

E-mail Address

B. Defendant(s) attachment page 8

Defendant No. 34

Name John R. Ashcroft
Job or Title Secretary of State
Street Address 600 West Maine Street
City and County Jefferson City
State and Zip Code MO, 65101
Telephone Number 573-751-4936
E-mail Address info@sos.mo.gov

Defendant No. 35

Name State of West Virginia
Job or Title
Street Address State Capitol Building
City and County Charleston,
State and Zip Code WV, 25305
Telephone Number 304-558-6000
E-mail Address

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1st Amendment, 12th Amendment, 14th Amendment, Bush vs. Palm Beach County Canvassing Board, Presidential Election Day Act of 1845, Citizens United vs. FEC, Gamble vs. United States

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

"see attachment"

B. What date and approximate time did the events giving rise to your claim(s) occur?

During Pandemic

III Statement of Claims “A” page 1

State of Hawaii Office of Elections has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Hawaii.

Lt. Governor Spencer Cox has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Utah

Director of Elections Gail Fenumiai has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Alaska.

Secretary of State Katie Hobbs has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Arizona.

Secretary of State Alex Padilla has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of California.

Governor Gavin Newsom has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of California.

III Statement of Claims “A” page 2

DC Board of Elections has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the District of Columbia.

Secretary of State Brad Raffensperger has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Georgia.

Illinois Legislator has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Illinois.

Secretary of State Paul Pate has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Iowa.

Maryland Board of Elections has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Maryland.

Secretary of State Joycelyn Benson has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast, and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Michigan.

III Statement of Claims “A” page 3

Secretary of State Steve Simon has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Minnesota.

Secretary of State Corey Stapleton has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Montana.

Secretary of State Robert B. Evnen has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Nebraska.

Secretary of State Barbara K. Cegavske has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Nevada.

Secretary of State Tahesha Way has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of New Jersey.

Secretary of State Maggie Toulouse Oliver has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of New Mexico.

III Statement of Claims “A” page 4

Oklahoma State Election Board Oliver has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Oklahoma.

Secretary of Commonwealth Kathy Boockvar has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in Pennsylvania.

Secretary of State Steve Barnett has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of South Dakota.

Secretary of State Jim Condos has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Vermont.

Virginia Department of Elections has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in Virginia.

Wisconsin Election Commission has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Wisconsin.

III Statement of Claims “A” page 5

Secretary of State Denise W. Merrill has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Connecticut.

Governor John Carney has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Delaware.

Indiana House of Representative and Senate has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Indiana.

Commonwealth of Kentucky State Board of Election has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the Kentucky.

Massachusetts State Legislature Election has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Massachusetts.

Governor Chris Sununu Election has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of New Hampshire.

III Statement of Claims “A” page 6

Governor Andrew M. Cuomo has caused duress that has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of New York.

South Carolina General Assembly has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of South Carolina.

Secretary of State John R. Ashcroft has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of Missouri.

State of West Virginia has inhibited my speech by causing to question if I should give money to candidate(s) either directly or indirectly in the Defendants state because of the culpable action to allow vote fraud by not having adequate checks in balances in place for independent audits of the mail-in ballots cast and/or extending absentee ballots from its former form, which also impinges citizens fully expressing their wish to the electoral college for whom they want for President. This was done during the Pandemic in the State of West Virginia.

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

Casting a ballot for a Presidential candidate, the individual is their expressing their free speech because it is the members of the electoral that vote the President, when citizens casting president ballot they are expressing to their wish of whom they like the electoral college member vote for. Ballots are being devalued by "later arbitrary and disparate treatment". We are entitled to undiluted expression of speech when citizens cast the ballot and expressing their wishes to the electoral college and uninhibited speech when making gifts and / or donations to other as outlined in Citizens United vs FEC.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

The Authority of the rule of law carries now we be eroded beyond description. Without the rule of law we will live in continues state of anarchy and chaos

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I ask that all mailing-in and extended absentee ballots be accompanied by a stamp from a notary on the ballot. The notary has an id number. The notary provides a log with date, place and the time when the process of the notary took place.

If this can not be done then the state(s) / commonwealth(s) must notify voters that their ballots will not count and that they must recast their vote in a manner identical too the process the State(s) / commonwealth(s) had in place in the Presidential election in 2016. Citizens United vs. FEC and Bush vs. Palm Beach County Canvassing Board entitle me to the above relief.

Voting fraud continues today with ballot harvesting discovered by the Project Veritas and reporting by PJ Media on Accusation in illegal Ballot Harvesting.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/02/2020

Signature of Plaintiff

Printed Name of Plaintiff

Andrew Ostrowski

Andrew Ostrowski

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address