

*ORIGINAL*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SVEND LA ROSE,

Plaintiff,

vs.

Northampton County,

Lehigh County,

DEFENDANTS

Case No.:

VERIFIED COMPLAINT FOR  
MANDATORY RELIEF

I hereby complain and for causes of action allege as follows:

1. Jurisdiction is proper in the United States district court because the cause of action arises under the US Constitution.
2. Venue is proper in the Eastern District of Pennsylvania because the defendant resides in this district and because the wrongs complained of are occurring right now in this district.
3. Plaintiff is a write-in candidate for the Bethlehem City Council who is eligible to that office.
4. Bethlehem is situated in both Northampton County and Lehigh County.
5. Defendant Northampton County is a local governmental entity, namely a county chartered by the Commonwealth of Pennsylvania. Defendant is responsible for registering voters and for administering elections.
6. Defendant Lehigh County is a local governmental entity, namely a county chartered by the Commonwealth of Pennsylvania. Defendant is responsible for registering voters and for administering elections.

FIRST CAUSE OF ACTION FOR UNCONSTITUTIONAL DENIAL OF RIGHT TO VOTE  
WITHOUT SUBSTANTIVE DUE PROCESS OF LAW

7. Defendants deny people under 18 who have completed the sixth grade the right to vote without substantive due process of law, in that they fail to register such people to vote, on the arbitrary and irrational grounds that they have not reached the magic age of 18 years, and under color of section 701 of the Pennsylvania Election Code.

8. The common law of minority is unconstitutional as applied to the voting rights of people who have completed the sixth grade because it is arbitrary, irrational, and not even reasonably related, let alone narrowly tailored, to any legitimate governmental interest, let alone a compelling interest.

SECOND CAUSE OF ACTION FOR UNCONSTITUTIONAL DENIAL OF EQUAL  
PROTECTION OF THE RIGHT TO VOTE

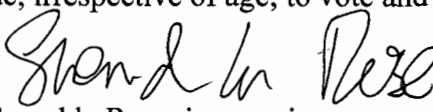
9. Defendants deny people under 18 who have completed the sixth grade the right to vote without equal protection of law, on the arbitrary and irrational grounds that they have not reached the magic age of 18 years, under color of section 701 of the Pennsylvania Election Code, but do not refuse to register people who are intellectually disabled to vote, even though such people are less mentally well-qualified to vote than such minors.

10. Paragraph 8 is hereby incorporated by reference.

I swear under penalty of perjury that the above statements are true and correct to the best of my personal knowledge.

Therefore I pray for relief in the nature of a writ of mandate, compelling defendants to register all persons who have completed the sixth grade, irrespective of age, to vote and to permit them to vote in elections.

Dated September 11, 2017.

  
Svend la Rose, in propria persona