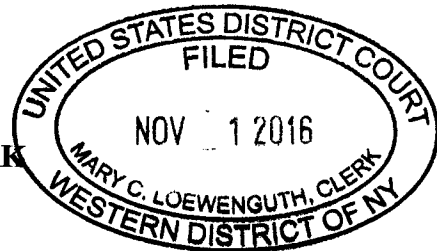


IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK



LOUISE K. NOLLEY AND  
ALL THOSE SIMILARLY SITUATED

Plaintiffs

- VS -

DONALD TRUMP AND  
HILLARY CLINTON  
In Their official and unofficial

Case Number

16 CV 8765

COMPLAINT AND REQUEST FOR INJUNCTION

1. The Parties to the Complaint

A The Plaintiffs

Louise K. Nolley  
107 Newfield Avenue  
Buffalo, New York 14207 and;

Every person who under the color of any statute, ordinance, regulation, custom or usage of any State or Territory, or the District of Columbia, subjects, or cause to be subjected, and citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, secured by the Constitution

Defendants

Job or Title

HILLARY CLINTON

Presidential Candidate

120 West 45th Street Suite 2700

New York, New York 10036

[www.hilleryclinton.com/go](http://www.hilleryclinton.com/go)

DONALD TRUMP

Presidential Candidate

The Donald Trump Org,

725 5<sup>th</sup> Avenue

New York, New York

[www.donaldjtrump.com](http://www.donaldjtrump.com)

**COMPLAINT AND REQUEST**

On November 8<sup>th</sup>, 2016, elections will be held to vote for the next President of the United States into office. The petitioner motions the court to issue an order prohibiting the election to commence. The 2016 election is a mockery of the United States Constitution and as such violates the Constitutional Right of every citizen of the United States. The candidates running for president of the United States will not be reliable to fulfill the role of Chief of State. The President is the "boss" for millions of government workers, a Chief Diplomat, a Chief Executive, Commander in Chief, a Legislature Leader, Chief of Party, and a Guardian of Economy. Neither of the candidates running for the Presidential seat shows that they can handle the position. The character of both candidates falls far below the standards mandated as a person representing the people; Neither candidate displays the ability to act as a lawyer to represent our Nation and protect the citizens of the United States. There are trust issues, questioning whether we the people can trust Hillary Clinton. The F.B.I. is one of the millions of people elected by the President to protect the people, protect the citizens from invasion of other Nations and as President he or she has to read, review information provided by the F.B.I. There shouldn't be a reasonable doubt that Hillary, can be trusted

with confidential information. Information must not be shared by the President with anyone. Not even with the spouse of the President. We have to trust our government workers. We must trust that the President and the F.B.I.'s investigation reports are true and correct.

We have to question electing Donald Trump. He has made racial comments throughout his campaign. He has no problem behaving rudely, mocking the disabled, down talking people of color, the poor, and the confined. There are reports of his sexually abusing women. By no means is he a family man. By no means is he professional. Being rich or having more than others does not make you a candidate for Presidency. We cannot put our lives, our country into the hands of a tyrant.

We have not been given good leader options of people to place into the President seat. The President has to be wise, knowledgeable and understanding. He or she has to be hospitable to foreign nation and has to keep an open mind to compromise. Prior Presidents has come too far with other Nations. We can't take chances with these candidates.

Peace talks and plans have been established. We have to continue on a road to freedom. We must continue to have peace talks and handshakes. We must continue to have trust worthy people in office and no second guesses about who we vote into office.

All of the above mentioned matters took place throughout the presidential campaign, and presidential debates. We have heard enough from both parties and it is definite, neither of the candidates qualify nor have they shown they will be beneficial to the citizens of the United States. We are headed to destructions if we allow this election to continue. Monetary damages are not asked with this injunction. Irreparable mistakes such as unnecessary wars, a stop of imports and exports. The economy will be lowered and delegated unevenly. The poor and the elderly have suffered enough. Our country will deprive people from different nations the right to freedom, and the families who have no food in other places of the world will starve without the United States help. These are the things we the people of the United States will surely suffer if Hillary Clinton or Donald Trump are voted into office. These are the people who will be the citizens lawyer, the person who will make decisions for our

Nation and whose job it will be to protect us from worldly harm.

### **BASES FOR JURISDICTION**

Federal courts are courts of (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 U.S.C. sec 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. sec 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 \$75,000.00 is a diversity of citizenship case. In a diversity case, no defendant may be a citizen of the same state as any plaintiff.

The bases of this action in federal court jurisdiction is a federal question.

Due Process (meaningful Due Process) Equal Protection and The Right to Counsel.

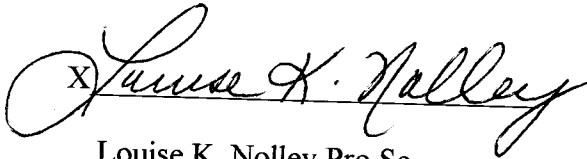
**THEREFORE**, the plaintiff motions for the court to:

- (1) GRANT; postponing the 2016 Presidential Election, and
- (2) GRANTING; President Barak Obama, to remain in office until serious, qualified, trustworthy persons can be sought and elected to fulfill the position of the President Of the United States and;
- (3) GRANTING; a hearing between the parties named in this action, and
- (4) GRANTING; the plaintiff time to gather signatures of those who are in favor of this Of this injunction and its context; and
- (5) For any and all relief as the Court deems just, fit and proper.

Under Federal Rules of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information and belief, that this complaint: (1) is being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is unsupported by existing law or a frivolous 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 rule 11.

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.

**Dated: October 30, 2016**

X 

Louise K. Nolley Pro Se

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louisenolley@yahoo.com