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Vs.

Florida Democratic Party
Defendant(s)

To the Honorable Court:

INTRODUCTION

1. This complaint is an action to redress the deprivation of rights secured to plaintiff by title VII of the Civil Rights Act of 1964, 42 U.S.C., Section 2000e, § 107 (a) of the American with Disabilities Act (“ADA”), as amended by CRA of 1991, 42 U.S.C. § 12117, which incorporates by reference § 706 of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 1983, 2000e-5 and those rights secured by the Fourteenth Amendment to the United States Constitution; and pursuant to Title 28 U.S.C., Section 1331 and 1343 and pursuant to Title IX, Chapter 104 FS and is not

frivolous.

JURISDICTION

The Defendant, The Democratic Party, is a foreign corporation, a legal entity, pursuant to SECTION 617.1503, FLORIDA STATUTES and the Defendant's agents, employees and associates are natural persons, all of them bonafide residents of the State of Florida and the Plaintiff is a 60 years old black male, a US citizen and at all times mentioned herein a bonafide resident of Miami-Dade, Florida since 1994, diagnosed with a biochemical brain imbalance.

Jurisdiction of this court is evoked under the First and Fourteenth Amendment of the United States Constitution, 42 U.S.C. § 1983.

FACTUAL BACKGROUND AND MEMORANDUM OF LAW

FACTUAL BACKGROUND

I. Cause of Action against President Barack Hussein Obama.

1. Plaintiff is a professional holding several degrees, among others: a bachelor degree in Computer Programming and System Analysis; an Associate in Business Administration, minor in accounting, from EDP college of Puerto Rico (1978-1983); a Microsoft System Engineer, Microsoft Data Base Administrator and Computer Repair Technician A+ certificates, from Miami-Dade College (2001-2003); 6 semesters of studies toward a Bachelor in Business Administration, major in Accounting, from Universidad Central del Este (U.C.E.) in Dominican Republic (1975-1978). Plaintiff is, also, a self taught Webmaster, specializing in eMarketing.

2. Plaintiff is a small family business owner, since 2001, acting as Director of Business Development of Net-Tronics.com, Corporation, a small business, organized according with the statutes of the State of Florida (see exhibit #1), whose website address is www.net-tronics.com. Plaintiff is considered as having a disability, as defined by title VII of the Civil Rights Act of 1964, 42 U.S.C., Section 2000e, § 107 (a) of the American with Disabilities Act ("ADA"), as amended by CRA of 1991.

3. On or about August 2007, Defendant, Obama for America, inc. and Plaintiff, started a friendship online on the social network known as myspace and Plaintiff started reposting Defendant messages and blogging for her.

4. On or about March 2008, when the Defendant Obama for America's candidate was an underdog in his aspiration for the presidential nomination of the Democratic Party, Defendant, Obama for America, Inc., requested Plaintiff to volunteer to assist with her campaign in Philadelphia Pa., a battleground of his opponent, to help him secure the aforementioned nomination, and Plaintiff replied in acceptance. On or about April 15, 2008, Plaintiff replied to Beth Bafford, Philadelphia out of state Volunteer Housing Coordinator and Max Stahl, Field Organizer in North Philadelphia for Defendant, Obama for America, Inc. in confirmation, traveling for 5 days to Philadelphia, as per Defendant request.

5. On or about may 2008, after returning to Miami from Philadelphia, Pa, where Plaintiff traveled to work at the streets as a canvassing captain at the request of the Obama's campaign online, as said on the above paragraph, Plaintiff was requested by Defendant employees and/or agents to register to vote for the first time in 23 years after becoming a US citizen; to join the Democratic Party and met Dave Patlak at the American Legion, located at 6445 NE 7th Ave., Miami, FL 33138.

At said time Dave Patlak proceeded to fill out a voting registration form and asked me if I was convicted of any felony and if so if my civil rights had been restored to which I told him I was convicted of a felony and that my rights had not been restored. He told me not to worry about it that the Democratic Party had a speedy procedure to restore my civil rights that he will take care of that matter and that he needed me to go out to register to vote as many felons as I could to restore their civil rights, which I did.

Following that event I got a voter card on my name and I noticed that my date of birth was changed from 07/07/1956 to 09/09/1956 and spoke to Dave Patlak about it. He told me that this was not a big deal but changing it would take some time and that I just needed to be consistent when providing the information in reference to my voting card. Thus I was instructed to apply for the office of 529 Precinct Captain and to apply as Poll Inspector with the Department of Elections which I did. I was elected unopposed and later I was sworn in as a Miami-Dade Democratic Executive Committeeman and was named and trained as a Data Manager in the Democratic Party's Voter Activation Network (VAN) system. Also, I was trained and hired as a Poll Inspector by the Miami-Dade County Department of Elections and worked at Corpus Christie Catholic Church in that capacity. On or about July 16, 2008, I contacted Attorney William Pena Wells requesting information on how to proceed with the restoration of civil rights since I had numerous ex-felons to process and I was not getting a reply from Dave Patlak in regard to that matter, therefore, I wanted the link to learn the

procedures. He told me that it was a long process.

6. Later on, as I was returning from my training on the Democratic Party's VAN system I received a call from Alejandro Miyar, Secretary of Press for the Obama Campaign informing me that I was invited as the keynote speaker for the opening of the Obama Campaign office in Little Havana. At the end I requested for a paid position available but instead I faced the back stabs from the team and on September 19 they plotted and got me violently removed by the secret service from an Obama rally held at the University of Miami. Notwithstanding this fact I moved to work at the Democratic Party Office in Liberty City on the creation of a voters database and assisting with training on the use of the Obama website, while canvassing my neighborhood, until the election day when I went by taxi to deposit my vote for the first time along with my sick mother because my car was stolen several days before, time when I filed my lawsuit PRO SE, in order to redress the violation of my civil rights, unaware that my civil rights were not restored as I was led to believe.

7. Past the presidential election and having get Barack Obama elected, as per the request of OFA and MOVEON.ORG, I continued volunteering to get pass the Affordable Care Act (ACA or OBAMACARE) and beyond the time it was enacted as Law of the Land while handling my case PRO SE. All my work on behalf of the Defendants can be seen online at: https://video.search.yahoo.com/search/video;_ylt=AwrBT0dTh39YeNwAXRVXNyoA;_ylu=X3oDMTE0c2k1ZG51BGNvbG8DYmYxBHBvcwMxBHZ0aWQDQjMyMzdfMQRzZWMDcGl2cw--?p=RICHARD+CHARMAN+OBAMA+VIDEOS&fr=yfp-t&fr2=piv-web

In the mean time I noticed how both, my fellow democrats and the Obama campaign team were trying to get rid of me by systematically slamming each door on my nose, as evidenced on May 11, 2009, during the Florida Democratic Party Delegate Breakfast Conference hosted by Millie Herrera at the cuban restaurant "Versailles", when attorney William Pena Wells attempted to deprive me of my opportunity to become a Florida Democratic Party Delegate by intentionally failing to write his name as witness number one of the form used for that purpose, as alternate method, reason why I demanded from Daysi Black to notarize it as it was the regular procedure. Attorney William Pena Wells is the same person from whom I requested information on the procedures to restore ex-felons civil rights and the one that told me "...you will not get a job" after I informed him of my lawsuit filed on Federal Court with Case No.: 08-23076-CIV-GOLD/MCALILEY, which included the Miami-Dade Democratic Party as a defendant. On June 27, 2009, A letter was sent to President Obama by certified mail informing him of the mentioned lawsuit but it was ignored and I never received a direct reply.

These events led me to believe that my fellow democrats were plotting against me to get my case dismissed, as it was, without a hearing in violation of the due process of law, and after the fact during a "conciliatory meeting" with their lawyers they told me that I would leave with my hand empty when I refused their offer of writing me a book (to show that the Obama campaign do not condone mistreatment of her volunteers) without compensating me for the author's fees.

Meanwhile, my mother, sick and unaware of my viacrucis, left to Dominican republic were she was left to die by her attendants as they observed how her blood sugar continued to raise during the whole day without calling the doctors on March 6, 2010. Later on, after my mother funeral services, I returned to Miami and attended my last meeting with the Miami-Dade DEC members and subsequently after receiving several harassing phone calls from officers of the Democratic Party I received a letter from the Miami-Dade Democratic Party expelling me, alleging falsely that I missed 3 consecutive meetings and that I was not paying my dues.

In this process Plaintiff suffered mental anguish, economic damages including but not limited to lost of his business and his credit, lost of money; lost of his car and of his driving privileges due to moving violation tickets imposed while campaigning for the Defendants which as of this time remain unpaid and for which Plaintiff was arrested.

II. Cause of Action against the Democratic Party.

1. - Plaintiff restates the established on paragraph I, on all its parts and states, furthermore, that Defendant the Democratic Party violated his right to vote by faking his voting registration committing a felony on his name, putting him at risk and subjecting him to the penalties established by Title IX, Chapter 104 FS and his ability to seek employment for which a complaint has been filed with the Florida Department of State, copy of which I am attaching as the only exhibit along with it supporting documents.

Memorandum of Law

A. Plaintiff is entitled to a day in court and to the relief sought.

In Paula Corbin Jones v. William Jefferson Clinton (95-1050/95-1167) the US Court of Appeals, Eight Circuit, expressed **"...we hold that a sitting President is not immune from suit for his unofficial acts "** which is consistent with the decision of The Supreme Court who stated in Marbury v. Madison **"...The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws whenever he receives an injury"**.

PETITION

For all the above reasons, Plaintiffs respectfully request that this Court, accept this COMPLAINT and grant him the request relief against the Defendants as follows:

- a. That this Honorable Court accept as valid this complaint and assign Plaintiff a compensation of US\$1,000,000.00 for damages caused by the Defendants and their agents to Plaintiff along with the corresponding court costs and Attorneys fees.

Respectfully submitted, today January 18, 2017, in Miami, Florida,

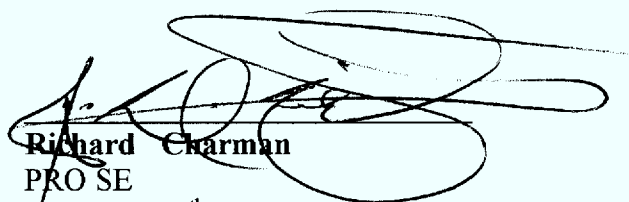


Richard Charman
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CERTIFICATE OF SERVICE

I, hereby, certify that on the 17th day of January, 2017, a true and exact copy of the foregoing was delivered to the Defendant Barack Hussein Obama at The White House, 1600 Pennsylvania Avenue, Washington DC, 20500 and to Defendant the Florida Democratic Party to their Florida known address at 214 South Bronough Street, Tallahasee, Fl 32302.

Respectfully submitted, today, January 18, 2017, in Miami, Florida.



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