IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Chong Su Yi   *

                                                   *

     Plaintiff(s)

                                                   *

     vs.   *   Civil No.:__**TDC 16 CV 0 6 6 2**

Bd. of Elections et al

                                                   *

     Defendant(s)

       ******

COMPLAINT

1.   Jurisdiction in this case is based on:

    [x]   Montgomery County of Maryland purchased digital machines to process

    ballots [voting machine] in 2014 et al, when 15th Amendment compels States to

    adhere to Article V and VI of the U.S. Constitution.

    [x]   28 U.S.C. 1331

    "The district courts shall have original jurisdiction . . . under Constitution, Laws, . ."

    [x]   28 U.S.C. 1357

    ". . or to enforce right of citizens of United States to vote in any State."

    [x]   15th amendment

    "The right of citizens of the Citizens of United States to vote shall not be denied . .

    of race comma color"

Federal Question:

When County's agency; herein Board of Elections; allowed its resources; herein Voting involving voting machines; exploited by Private Corporation for Private or Public but none governmental Corporation's; herein DNC and RNC et al; own agenda; lawful under State's own laws; annotated Code of Maryland Election Laws; but is in conflict with enumerated Constitutional Laws; i.e. 15th Amendment 'to vote':

1.   May its Act declared Unconstitutional?

2.   May Court directing Closure of said Corporation lawful under the Constitution?

3.   May prohibition deliberated of said resources lain by Court, implemented against said

4.   Corporation Constitutionally proper?

2.   The facts of this case are:

Board of Elections at Montgomery County Maryland, herein Bd. of E; purchased new digital voting machine; in 2014, when query was sent to Board of Elections regarding 2014 decision to purchase digital voting machine, failure to comply to 15th amendment, since 15th amendment does not allow digital format voting machine, and only in 2001 Court ruled Digital Format is different format; in order to comply with Constitutional mandate of 15th amendment it needed consent of Congress to convert to digital format,

Bd. of E. purchased new machine based on paper ballot, but new machine while allows Ballot to be scanned and collects paper ballot it does not issue any form of receipt; to prove voter was not denied; in compliance of 15th amendment; during upcoming April 26, 2016

primary of DNC and RNC et al; and November 8th of 2016 Presidential et al election.

List of Parties:

Board of Elections
18753 Frederick Avenue, Suite 210 Gaithersburg MD 20879

Democratic National Committee; DNC
340 S. Capitol Street S.E. Washington DC 20003.

Maryland Democratic Party; MDP
33 West Street Suite 200, Annapolis Maryland 21401.

Republican National Committee; RNC
310 First Street S.E. Washington DC 20003.

Maryland Republican Party; MRP
15 West Street Annapolis Maryland 21401.

Chong Su Yi pro se, none attorney, none law school, none college
8210 Dixon Avenue Silver Spring MD 20910

2a.   Argument of the case are:

Given:

a. Articles are immutable Edict as per Article V and VI of U.S. Constitution;

i.e. Congress may only ratify Amendments; Congress may not ratify Article;

b. In Constitution, what is in Constitution is not of States Jurisdiction;

e.g. State may not alter Constitution as per Article V and VI;

since several States participation is a must in ratification of Amendment.

Deductive Reasoning:

a. Compulsion by Article or Amendments in U.S. Constitution is absolute; ipso facto in

the prior order cogniscendi, as per Article V and VI, regardless of States laws by virtue of

its existence; insofar, States are compel to adhere to each of Article and Amendments according to each of raised issue from incident; because law is of the moment of raised issue from incident to victim or suspect or event, where compulsion causes chain reaction of cause and effect of propagation of the subsumed diffraction or convergence; to conclusion from subject matter in resolution of controversies.

It means Bd. of E. should have known not to deploy voting machines when issue of 15th amendment was raised, because of built in compulsion of Amendment. Its compulsion is 'to vote', 'color', and 'race', jointly or severally due to presence of comma.

b., Because Controversies are Bd. of E.'s voting machines, 'to vote' in 15th Amendment, involving Democratic National Committee and Republican National Committee and its franchises; whether DNC, and RNC and its franchises were lawfully engaged in Interstate Commerce, which is separate issue for another court; in that the governance of activity of 'to vote' is of Federal Government due to 15th Amendment; not States;

In conjunction with 15th amendment; DNC and RNC et al were are compelled by Constitution to Cease operation of the ratification of 15th amendment; i.e. February of 1870, which means for 146 yrs.; from 1870 to 2016; DNC and RNC et al operated in violation of 15th amendment, which is controversies for separate court; because issue before the court is 2016 elections of its primaries et al. regarding 15th Amendment's Clause 1 'to vote', 'citizen of color', citizen of race'; and in Clause 2 'Congress';

c., in Clause 1 'to vote' is not past but future, therefore, compulsion in matter of pursuit was proper, in Clause 2 'Congress' must mean it is properly formed and developed Congress, which means current congress is unlawful congress to enforce 15th amendment.

Conclusion:

DNC and RNC in 2016; unlawful operation because existence of 15th amendment forces
DNC and RNC to adhere to Constitutional mandate which they did not, because 'to vote'
is interstate commerce; power and authority belong to federal government.
Which means Bd. of E. must not allow voting machines to be deployed in conventional
operation; until such time as 15th amendments mandate 'congress shall have jurisdiction to
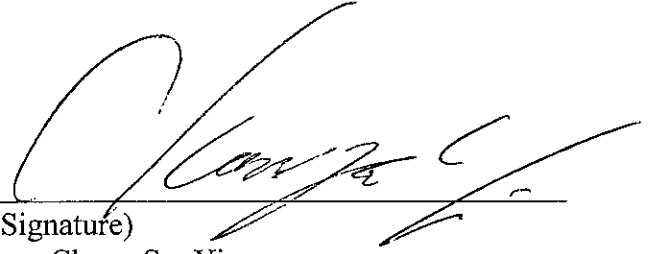enforce it';

3. The relief I want the court to order is:

[x]   An injunction ordering: cancel April 26, 2016 Maryland Primaries of Maryland
      Democratic Party and Maryland Republican Party.

[x]   An order ordering: Clerk to notify all U.S. district courts of its ruling.

[x]   An injunction ordering: 2016 Primary voting machine not to be used.

[x]   Other (explain) Declare result of 2014 midterm election held in State of Maryland on
      House of Representative via the voting machines improper certification;

[x]   Other (explain) Declare result of 2012 presidential primary election et al held in State of
      Maryland via the voting machines improper certification;

[x]   Other (explain) Declare result of 2014 senate primary election held in State of Maryland

via the voting machines Improper certification;

[x]   Other (explain) <u>Declare result of 2014 Governor's election and County election held</u>

<u>in State of Maryland via the voting machines improper certification;</u>

<u>3/7/2016</u>
(Date)

(Signature)

Chong Su Yi
8210 Dixon Avenue Silver Spring MD 20910
(301) 585 6463 x2