

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2016 MAR 17 AM 11:55

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BY _____ DEPUTY

Chong Su Yi

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Plaintiff(s)

*

vs.

*

Civil No.: TDC 16 CV 0662

Bd. of Elections et al

*

Defendant(s)

Writ of Mandamus

1. Jurisdiction in this case is based on:

☒ Judge's Case Management Order dated: 03/09/2016

☒ 28 U.S.C. 1331

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

☒ 28 U.S.C. 1357

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

2. The facts of this case are:

Recapitulation original Complaint:

2014, Board of Elections in Montgomery County purchased digital format voting machine,

and County residents were notified; and Plaintiff challenged raising 15th amendment;
to vote in 1870 could not have meant digital format since 2001 in NY Times v Tsani
Court ruled Digital format is different format; therefore, voting machines are
Unconstitutional; needs constitutional mandate; e.g. prohibition 18th amendment;
Subsequently in 2016; Board of Elections bought new voting machine that takes image of
Paper Ballot; but does not produce receipt to person who cast the ballot thereby violating
Intent of 15th amendment; to vote and not be discriminated; transaction took place; to
Insure 'denied or abridged' is met; there must be receipt produced; not to mention
Taking image of ballot in digital format also violates previous assertion.
Point raised before the court; April 24th 2016 State of Maryland Primary could not be held;
Because Plaintiff is registered independent and use of voting machines via Board of
Elections; violates due process of the law et al;

Recapitulation Writ of Mandamus

Plaintiff filed Complaint and Judge issued Case Management Order.

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: Writ of Mandamus

- a. Must be Entitlement i.e. matter by rights; e.g. Constitution et al.,
- b. There must not be any other way; i.e. State's Best Interest; e.g. if there are less intrusive way; under first amendment challenge; State must take less intrusive way;
- c. It must be last resort; i.e. Brandies Brief; e.g. when there are no laws; social implications could be explored.

Deductive Reasoning:

- a. this case evolves in constitutional mandate; of Voting for course of nation; and there is deadline of April 26th 2016 the date of State of Maryland Primary; if it happens its in violation of Constitution; because there was no Constitutional mandate to alter 15th amendment 'to vote' elevating vote to Federal level; where plaintiff is colored person; and of none white race; which 15th amendment apply. But despite explanation judge issued Case Management Order; which is lawful; and is allowed. However *sua sponte* allows judge to alter the chain reaction that is taking place, which he has not done; therefore, Writ of Mandamus is being filed due to his Standing Order.
- b., issue is very clear; preamble of Constitution states; justice is for more perfect Union;

which means when Justice is done with some thing; result must be more perfect Union; and this case create more perfect union; because original action the Complaint allows Constitution enforcement to come through Plaintiff; pro se; before the court; which is lawful and allowed.

Because nature of original action is constitutional issue in nature and attempts has been made; to let enforcement of Constitution to come before the court of same issue; which has not been adjudicated; which makes this second attempt to enforce the Constitution for more perfect union; therefore, Plaintiff prays to court more latitude by Court seem proper; in matter of enforcement of 15th amendment;

c., because 15th amendment enumeration; to vote; is entitlement; issue before the court; and because the issue is federal level and constitutional in nature it cannot be addressed by any other means; and because 4th circuit of appeal is part of U.S. District Court; only other Court allowed is Supreme Court of United States therefore, this is avenue of last resort.

Conclusion:

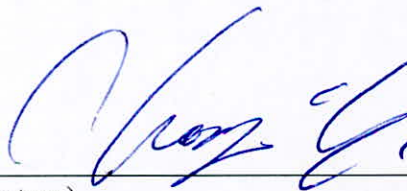
Due to Aforementioned issues Writ of Mandamus is proper; and pray to Court issue the relief enumerated in Writ of Mandamus.

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

- ☒ An injunction ordering: cancel April 26, 2016 Maryland Primaries of Maryland Democratic Party and Maryland Republican Party.

- ☒ An order ordering: Clerk to notify all U.S. district courts of its ruling.
- ☒ An injunction ordering: 2016 Primary voting machine not to be used.
- ☒ Other (explain) Declare result of 2014 midterm election held in State of Maryland on House of Representative via the voting machines improper certification;
- ☒ Other (explain) Declare result of 2012 presidential primary election et al held in State of Maryland via the voting machines improper certification;
- ☒ Other (explain) Declare result of 2014 senate primary election held in State of Maryland via the voting machines Improper certification;
- ☒ Other (explain) Declare result of 2014 Governor's election and County election held in State of Maryland via the voting machines improper certification;

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3/7/2016
(Date)


(Signature)
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