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IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE

EARLEY STORY
Plaintiff,

vs.

Tre Hargett, Secretary of the State of Tennessee ;
Richard Holden, Shelby County Election Commission;
Mark Goins, Tennessee Election Coordinator;
Cara Harr, HAVA Attorney
Defendants.

COMPLAINT FOR VIOLATION OF THE HELP AMERICA VOTE ACT OF 2002, TITLE III

COMPLAINT FOR DAMAGES

Comes now Earley Story, pro se and a Petitioner for Federal appointed counsel, and for its Complaint for Damages against Defendants Richard Holden, Mark Goins and Cara Harr, individually referred as the Defendants, and others to be named later, would respectfully show the court as follows.

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff, Earley Story, is a citizen of Memphis, Tennessee and resides inside the County of Shelby, with the home address of 4700 Gill, Memphis, Tennessee 38109.
2. Tre Hargett, is the Secretary of the State of Tennessee, located at 312 Rosa L. Parks Avenue, 9th Floor, Nashville TN., 37243.
3. The Defendant, Richard Holden, upon information and belief, is the Administrator of Elections of Shelby County, located at 150 Washington Ave, 2nd floor, Ste 205, Memphis Tennessee, 38103.
4. Defendant Mark Goins, upon information and belief is the Tennessee Election Coordinator, located at 312 Rosa L Parks Avenue, 7th Floor, Snodgrass Tower Nashville TN, 37243.
5. Defendant Cara Harr, upon information and belief, is the HAVA Attorney for the State of Tennessee and office is located at 312 Rosa Parks Ave., 7th Floor, Snodgrass Tower, Nashville Tennessee.
6. Plaintiff and Defendants are citizens of the State of Tennessee.
7. This Court has original jurisdiction over this action pursuant to 28 U.S.C. 1331.

FACTUAL BACKGROUND AND COMPLAINT

8. This Plaintiff filed a Title III complaint to the Tennessee Secretary of State, Tre Hargett, on August 16, 2014.

The complaint informed him of false felony numbers that the Shelby County Election Commission had issued to this Plaintiff on January 31, 2000, April 26, 2002 and October 19, 2004.

The complaint also noted and advised that many more citizens of Shelby County may have been disenfranchised the same way and time frame!

The Title III complaint form violations were ,Provisional Voting or Voting Information and Computerized Statewide Voter Registration List.

9. This Plaintiff received a letter from Coordinator Mark Goins and HAVA attorney Cara Harr on September 18, 2014.

The letter indicated that they had found no Title III violations.

The letter indicated that the Shelby County Election Commission assigned felony numbers to my that was generated from the system due to a purge letter.

The letter indicated that this Plaintiff could contact them if I had any questions.

10. This Plaintiff called and talked with attorney Cara Harr and Mark Goins in either later part of September or the first part of October 2014.

When this plaintiff asked attorney Harr would the information concerning the false felony numbers be included in the Statewide data system, she stated no.

Attorney Harr also informed me that the system generated felony numbers were specifically for Shelby County .

11. I was informed by the HAVA attorney , Cara Harr,that I did not have a right to have a hearing on my complaint in Tennessee.

12. Attorney Cara Harr informed me that Shelby County has a different voter registration system from Tennessee other Counties!

Remedy

- a. This Plaintiff is requesting as a remedy for this violation of federal law \$300.000.
- b. This Plaintiff further request the Government to enforce the laws of the United States forbidding the disenfranchisement of it's citizens .

Under the penalty of perjury I, Earley Story, declares the contents of this complaint to be true.

Earley Story
4700 Gill Rd
Memphis TN. 38109

