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4 ROBERT R. DYER, Pro Se

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6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE DISTRICT OF MAINE (PORTLAND DIVISION)

8 PLAINTIFF:
9 ROBERT R. DYER

10 Vs.

11 DEFENDANTS:
12 KAMALA DEVI HARRIS,
13 JOSEPH R. BIDEN JR.,
14 MICHAEL R. PENCE,
15 DEMOCRATIC NATIONAL COMMITTEE
16 (DNC), MAINE STATE DEMOCRATIC
17 COMMITTEE, SECRETARY OF STATE OF
18 MAINE AND JOHN DOE(S)

CASE NO.: 2:21-CV-2-NNT

**MOTION FOR TEMPORARY
RESTRAINING ORDER**

AND

**REQUEST FOR EMERGENCY EX-
PARTE HEARING**

19
20 **VERIFIED PETITION FOR TEMPORARY INJUNCTION**

21 The plaintiff, Robert R. Dyer, in the above captioned matter, moves the Honorable Court to issue
22 a temporary injunction and order restraining the defendant, Michael R. Pence, in his role as the
23 President of the Senate, from certifying the Electoral College Votes submitted to him and the
24 Senate, by all fifty of the respective States within the United States.

25
26 **JURISDICTIONAL ALLEGATIONS**

- 27 1. This is an action for the equitable remedy of a temporary injunction.
28 2. Petitioner resides in York County, Maine.

- 1 3. The threatened harm is a federal election issue to be enjoined and is threatened to be imposed
- 2 in York County., Washington D.C., and the United States as a whole.
- 3 4. Respondent(s) reside in Washington D.C., California, Delaware, Maine, and may have
- 4 multiple residences within the United States as senior government officials.
- 5 5. This Honorable Court has jurisdiction.

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7 **FACTUAL ALLEGATIONS**

- 8 6. The petitioner has requested an expedited declaratory judgement as set forth in the Verified
- 9 Complaint.
- 10 7. The acceptance and counting of Electoral College votes being submitted to the Senate for
- 11 Certification by the States, contain significant Electoral College Votes that were determined
- 12 by the respective States, from many millions of votes cast for an “Unconstitutionally
- 13 Qualified Democratic Slate of Biden/Harris”, as outlined in the complaint.
- 14 8. The threat is imminent because the Counting and Certification of the Electoral College votes
- 15 is imminent.
- 16 9. The threatened harm to the petitioner, of having an Unconstitutionally Qualified Vice
- 17 President seated based on the unqualified Democratic Party Presidential Slate on the ballot in
- 18 Maine and each State nationwide, far outweighs any substantial harm to the respondents
- 19 because it is temporary in nature, and was based on the respondents erroneous vetting actions
- 20 and processes in selecting a Democratic Party Slate for the 2020 Federal Election.
- 21 10. There is significant public interest in the 2020 Federal Election for President and the voting
- 22 processes and procedures that were followed by the States and have been further
- 23 compromised by the Democratic Party organization(s) submitting an unqualified Presidential
- 24 Party Slate for voting to every State.
- 25 11. There is significant public interest in the 2020 Federal Election for President and the
- 26 necessity to ensure the nationwide voters, that voted for a fully “Constitutionally Qualified”
- 27 Presidential Party Slate are not defrauded by the actions of the Democratic Party failing to
- 28 conduct proper vetting of their respective Party Slate.

12. There is significant public interest in this Honorable Court having additional time to evaluate the expedited declaratory request, outlined in the complaint, before the Electoral Votes become fully certified.

13. The declaratory judgement sought by the plaintiff in the complaint, the foreign citizenship disqualification of Kamala Harris to hold President or Vice President positions, will require the 2020 Federal Election ballots cast for an “Unconstitutionally Qualified Democratic Slate of Biden/Harris” to be nullified, if this court so rules.

14. There is substantial likelihood that the petitioner will prevail in this action, because the facts as they exist currently in public record, and facts obtained on the record by discovery will reveal that Kamala Harris has foreign citizenship(s) which disqualifies her from consideration as a President or Vice President of the United States.

15. The nullification of the votes for the Democratic Party Slate during the 2020 Federal Election, will require significant rework by the respective individual states, but should be conducted expeditiously and allow them to submit corrected Electoral College Votes based on only valid votes for “Constitutionally Qualified Presidential Party Slates”.


16. The Senate and Congress can then reconvene and finish their portion of the process and procedures that they perform in certifying the Electoral College Vote necessary for electing the President and Vice President of the United States.

17. A temporary injunction by this honorable Court is necessary to protect the petitioner and millions of other voters from the threatened and Unconstitutional harm.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to order the Defendant, Michael R. Pence, in his role of President of the Senate, from certifying the Electoral College Vote until such time as this Honorable Court or others have ruled on the Petitioner’s complaint for the expedited declaratory judgements requested in the complaint.

1 UNDER THE PENALTIES OF PERJURY, I affirm that the facts alleged in the foregoing are
2 true and correct according to my own personal knowledge.

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4 Date of Signing: January 6, 2021.

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6 Signature of Plaintiff: 

7 Printed Name of Plaintiff: Robert R. Dyer