UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Civil Division

Neville D. Richards, Voter Registration Number: 124301826,) Case No.
	(to be filled in by the Clerk's Office)
Plaintiff(s)))
-V-)
WENDY SARTORI, PALM BEACH COUNTY SUPERVISOR OF ELECTIONS) FILED BY 1 2022
Defendant(s)	ANGELA E. NOBLE CLERK U.S. DIST. CT. S.D. OF FLA. – W.P.B.

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Neville D. Richards
Street Address	4181 Chukker Dr
City and County	West Palm Beach, Palm Beach County
State and Zip Code	FL 33406
Telephone Number	561-214-0321
E-mail Address	nevillerich66@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1	
Name	WENDY SARTORY
Job or Title (if known)	PALM BEACH COUNTY SUPERVISOR OF ELECTION
Street Address	240 S. Military Trail
City and County	West Palm Beach, Palm Beach County
State and Zip Code	FL 33415
Telephone Number	(561) 656-6200
E-mail Address (if known)	info@votepalmbeach.gov
Defendant No. 2	
Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	
Defendant No. 3	
Name	
Job or Title (if known)	
Street Address	
City and County	•
State and Zip Code	
Telephone Number	
E-mail Address (if known)	
Defendant No. 4	
Name	
Job or Title (if known)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (if known)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What i	s the ba	sis for f	ederal court jurisdiction? (c)	neck all that apply)	
	Fede	ral ques	ion \square	Diversity of citizenship	
Fill ou	t the pa	ragraphs	in this section that apply to	this case.	
Α.	If the	Basis fo	r Jurisdiction Is a Federa	Question	
				eaties, and/or provisions of the United Sta	
	2022 wit, 1	Federal S-2.032	Congressional District Elect Uniform Design for Election	ots approved and printed by the Supervisor tions fail to conform to very specific State Ballots) which is a violation of 2 U.S.C. § hence subject to redress via 2 U.S.C. § 1	Laws and Rules (to 9. These ballots are
B.	If the	Basis fo	or Jurisdiction Is Diversity	of Citizenship	
	1.	The P	laintiff(s)		
		a.	If the plaintiff is an indivi	dual	
			The plaintiff, (name)		, is a citizen of the
			C	•	
		b.	If the plaintiff is a corpora	ution	
			The plaintiff, (name)		, is incorporated
			under the laws of the State	e of (name)	
			and has its principal place	of business in the State of (name)	
			re than one plaintiff is name information for each additio	d in the complaint, attach an additional p nal plaintiff.)	page providing the
	2.	The D	efendant(s)		
		a.	If the defendant is an indi	vidual	
			The defendant, (name)		, is a citizen of
			the State of (name)		Or is a citizen of
			(foreign nation)	•	

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			The defend	ant, (name)		, is incorporated unde
			the laws of	the State of (name)		, and has its
			principal pl	lace of business in the State	of (name)	
			Or is incorp	porated under the laws of for	oreign nation)	
			and has its	principal place of business	in (name) 	
				efendant is named in the co or each additional defendan	•	tional page providing the
	3.	The A	mount in Co	ntroversy		
				roversy–the amount the pla \$75,000, not counting interest		
Ctat	amont of	Claim				
State	ement of	Claim				
Writ facts was inclu	te a short as showing involved auding the on and write	and plair that eac and wha lates and	h plaintiff is e t each defenda d places of tha	The claim. Do not make legentitled to the injunction or cant did that caused the plain at involvement or conduct.	other relief sought. Stat tiff harm or violated the If more than one claim	te how each defendant e plaintiff's rights, is asserted, number each
Writ facts was inclu	te a short as showing involved auding the control and write ded. Where The Emisle fact, a delibe be a test	and plain that eace and what lates and e a shore did the sallots apads vote a Special erately o	h plaintiff is et each defended to places of that and plain state events giving oproved and cors into believing the lection for the regligently agent ploy to contact the play to play the play to contact the play to play the pla	entitled to the injunction or cant did that caused the plain at involvement or conduct.	other relief sought. Stat stiff harm or violated the If more than one claim eparate paragraph. Atta ? y, Palm Beach County St tion is a "closed" Primar prict (Federal). Ms. Sarto be utilized for Primary E	te how each defendant te plaintiff's rights, is asserted, number each the additional pages if Supervisor of Elections, ry election when it is, in ory and/or her office have Elections. This appears to
Writ facts was incluctain need A.	te a short as showing involved auding the control and write ded. Where The Emisle fact, a delibe be a teferal	and plain that eac and what dates and e a shore did the sallots and ads vote a Special erately of ranspare al election	h plaintiff is et each defended places of that and plain state events giving oproved and cors into believil Election for the regligently agent ploy to contain any and feet	entitled to the injunction or cant did that caused the plain at involvement or conduct. Interest of each claim in a set of grise to your claim(s) occur distributed by Wendy Sartoring that the 01/11/2022 election the 20th Congressional Distributed ballots that are to infuse voters and suppress valeral Civil Rights law.	other relief sought. Stat tiff harm or violated the If more than one claim eparate paragraph. Atta ? y, Palm Beach County Stion is a "closed" Primar trict (Federal). Ms. Sarto be utilized for Primary E voter participation which	te how each defendant to plaintiff's rights, is asserted, number each additional pages if Supervisor of Elections, ry election when it is, in ory and/or her office have elections. This appears to a constitutes a violation of
Writ facts was inclu clain need	te a short as showing involved auding the control and write ded. Where The Emisle fact, a delibe be a to federa What On or ballot	and plain that eace and what dates and e a shore e did the sallots ap ads vote a Special erately of ransparral election date and about J and, to	h plaintiff is et each defended places of that and plain state events giving opproved and cors into believing Election for the regligently agent ploy to conclude any and feed approximate anuary 10, 20	entitled to the injunction or of ant did that caused the plain at involvement or conduct. Itement of each claim in a set of the set	other relief sought. Statutiff harm or violated the lift more than one claim eparate paragraph. Attation is a "closed" Primarict (Federal). Ms. Sarto be utilized for Primary Evoter participation which rise to your claim(s) occurred when Plaintiff download	te how each defendant to plaintiff's rights, is asserted, number each ach additional pages if Supervisor of Elections, ry election when it is, in ory and/or her office have elections. This appears to a constitutes a violation of the constitutes a violation of the constitutes are elections.

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what?

Was anyone else involved? Who else saw what happened?)
Plaintiff downloaded his sample ballot from the website of the Palm Beach County Supervisor and discovered that the Ballot approved for usage for the 01/11/2022 Special Election is, in fact, a ballot that Florida law, to wit, 1S-2.032 Uniform Design for Election Ballots, authorizes for Primary Election not general election. Rightly concluding that this was part of a larger plot to confound the potential voter and suppress voter participation, Plaintiff pressed suit to see emergency redress before this Hon'ble Court.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured. Plaintiff's vote as well as the vote of his friends and neighbors will be suppressed and their favored candidate will lose the election. This is in addition to the per se injury of having fraud perpetrated by a government official to reduce voter participation.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

An EMERGENCY EX PARTE TEMPORARY RESTRAINING ORDER against the office of Wendy Sartory preventing her from using the impugned ballot and forcing her office to issue ballots that conform to Uniform Special Election Ballot Design as per Florida Secretary of State Rule 1S-2.032.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case—related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

	Date of signing:	01/11/2022
	Signature of Plaintiff	Neville D. Richards
	Printed Name of Plaintiff	Neville D. Richards
В.	For Attorneys	
	Date of signing:	
	Signature of Attorney	
	Printed Name of Attorney	
	Bar Number	
	Name of Law Firm	
	Street Address	
	State and Zip Code	
	Telephone Number	
	E-mail Address	

EXHIBIT "A"

Official Special Election Ballot January 11, 2022 Republican Party Palm Beach County, Florida

Boleta Oficial de la Elección Especial 11 de enero de 2022 Partido Republicano Condado de Palm Beach, Fiorida

PCT. 2108R

- Instructions: To vote, fill in the oval completely next to your choice. Use only black ballpoint pen.
 If you make a mistake, ask for a new ballot. Do not cross out or your vote may not count.
 To vote for a write-in candidate, fill in the oval and print the name clearly on the blank line provided for the write-in candidate.



para el candidato por escrito.	·	·	•
SPECIAL GENERAL ELECTION ELECCIÓN GENERAL ESPECIAL			
Representative in Congress District 20 (Vote for One) Representante en el Congreso Distrito 20 (Vote por Uno)			
Jason Mariner	REP		
 Sheila Cherfilus-McCormick 	DEM		
○ Mike ter Maat	LPF		
○ Leonard L. Serratore	NPA		
○ Jim Flynn	NPA		
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Write-in / Escribir			
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JS 44 (Rev. 10/20) FLSD Revised 02/12/2021

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS	DEFENDANTS								
N	leville D. Richards			1	WENDY	SARTORI, PA	ALM BEAC	H COU	JNTY
· · ·	of First Listed Plaintiff Pal ACEPT IN U.S. PLAINTIFF CA	· · · · — - · · · · · · ·	County of Reside		(IN U.S. F	ed Defendant PLAINTIFF CASES CONDEMNATION CA	,	LOCATIO	ON OF
(c) Attorneys (Firm Name, A	Address, and Telephone Number	1	Attorneys (If Kno	Т	HE TRACT	OF LAND INVOLV	VED.	Doc. III	J. 1 J.
	•			•					
(d) Check County Where Action	on Arose:	☐ MONROE ☐ BROWARD	□ PALM BEACH □ MARTIN □ ST	r, lucie	□ INDIAN I	RIVER	EE □ HIGHLAND	s	
II. BASIS OF JURISDI	CTION (Place an "λ" i	n One Box Only)	II. CITIZENSHIP OF		INCIPA:	L PARTIES (P			
U.S. Government Plaintiff	☑ 3 Fede (U.S. Government)	eral Question Not a Party)	(For Diversity Cases Or Citizen of This State	‴,y PTF © 1		Incorporated or Pri			DEF
2 U.S. Government Defendant	_	ersity ip of Parties in Item III)	Citizen of Another State	□ 2	2	Incorporated and P of Business In A		□ 5	□ 5
			Citizen or Subject of a Foreign Country	□ 3	□ 3	Foreign Nation		□ 6	□ 6
IV. NATURE OF SUIT	_	dy) RTS	Click here for: Nature of Suit Co FORFEITURE/PENALT		_*	KRUPTĆY	OTUE	STATUT	rec
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment	PERSONAL INJURY 310 Airplane 315 Airplane Product Liability 320 Assault, Libel & Slander 330 Federal Employers' Liability	PERSONAL INJURY 365 Personal Injury - Product Liability 367 Health Care/ Phannaceutical Personal Injury Product Liability 368 Asbestos Personal	625 Drug Related Seizure of Property 21 USC 8		422 Appe 423 With 28 U PROPE 820 Copy 830 Paten 835 Paten	al 28 USC 158 drawal SC 157 RTY RIGHTS rights tt - Abbreviated	375 False (376 Qui Ta 3729 (a)) 400 State F 410 Antitru 430 Banks 450 Comm	Claims Act im (31 USo Reapportion ist and Banki erce	C
Student Loans	☐ 340 Marine	Injury Product Liab	pility	F	→ 880 Defer	rug Application emark nd Trade Secrets	☐ 470 Racke	teer Influ	enced and
(Excl. Veterans)	345 Marine Product		LABOR	•	- Actor	L SECURITY	- 480 Coreu	-	
☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment	Liability 350 Motor Vehicle Product Liability 360 Other Personal Injury 362 Personal Injury Med. Malpractice CIVIL RIGHTS 440 Other Civil Rights 441 Voting 442 Employment	PERSONAL PROPERTY 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage 385 Property Damage Product Liability PRISONER PETITIONS Habeas Corpus: 463 Alien Detainee 510 Motions to Vaca Sentence	Act 720 Labor/Mgmt. Relation 740 Railway Labor Act 751 Family and Medical Leave Act 790 Other Labor Litigation 791 Empl. Ret. Inc. Security Act	as [863 DIW 864 SSID 865 RSI (FEDĒRA 870 Taxe	Lung (923) C/DIWW (405(g)) Title XVI	485 Teleph Protection 490 Cable/ 850 Securit Exchange 890 Other: 891 Agricu 893 Enviro 895 Freedo Act 896 Arbitra 896 Arbitra	one Consu Act (TCPA Stat TV iies/Comm Statutory A Itural Acts nmental M m of Infor istrative Pr w or Appe	odities/ Actions latters mation
☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	□ 443 Housing/ Accommodations □ 445 Amer. w/Disabilities - Employment □ 446 Amer. w/Disabilities - Other □ 448 Education	Other: 530 General 535 Death Penalty 540 Mandamus & Other 550 Civil Rights 555 Prison Condition 560 Civil Detainee - Conditions of Confinement	IMMIGRATION ☐ 462 Naturalization Applica ☐ 465 Other Immigration Actions	ation			950 Const Statutes	itutionality	of State
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VI. RELATED/ RE-FILED CASE(S)	(See instructions): a) JUDO	, -	Mo b) Related	d Case	_	NO KET NUMBER:			
VII. CAUSE OF ACTIO			filing and Write a Brief State (for both sides to try entire c		of Cause (Do not cite jurisdiction	onal statutes unl	ess diversi	ŋ·):
VIII. REQUESTED IN COMPLAINT:		IS A CLASS ACTION	DEMAND \$			HECK YES only i			t;
ABOVE INFORMATION IS TO DATE	TRUE & CORRECT TO T	SIGNATURE OF A	WLEDGE ATTORNEY OF RECORD E LITIGANT	N		Y DEMAND: O. Richards	☐ Yes	☑ No	
FOR OFFICE USE ONLY: RECE	CIPT # AMO	U NT IFF	JUDGE		 	MAG JUDGE			