	IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS	FILED
Celisha To	wers)	DEC 10 2021
)	Clerk, U.S. District Court By: Deputy Clerk
(Enter above the fu	ill name of the Plaintiff(s)	
vs.	Case Number 21	-4089-JWL-ADM
Unified Govern Name 710 N 7th s	ment of Wyandotte and Kansas City, KS	
Street and number Kansas Chy City	Kansas (4410a) State ZipCode)	
Defendant in this a	all name and address of the ction - list the name and itional defendants on the back	
	CIVIL COMPLAINT	
I. Parties to the	nis civil action:	
<u>-</u>	below, place your name in the first blank and place your lk. Do the same for additional plaintiffs, if any, on the base	♣
A. Nan	ne of plaintiff Celishe Towers	
Add	Iress 11216 Delaware Parkway +	¥4409
. · · · <u></u>	ress 11216 Delaware Parkway & Kansas City, Kansas 66109	
.	•	

(In item B below, write the full name of the defendant in the first blank. In the second

blank, write the official position of the defendant. Use item C for the names and positions of any additional defendants). Defendant Unified Government of Wyandotte County and is Kansas etal.

Employed at Government В. Additional Defendants Machael Abbott Election Commissioner; C. Board of Canvassers; Henry Couchman TR; Jeffrey Conway; Suezanne Bishop; Jurisdiction: USC & 1331; 14th Amendment; 19th Amendment; (Complete one or more of the following subparagraphs, A., B.1, B.2., or B.3., whichever is applicable.) A. (If Applicable) Diversity of citizenship and amount: Plaintiff is a citizen of the State of Kansas 1. 2. The first-named defendant above is either a. a citizen of the State of Kansas b. a corporation incorporated under the laws of the State of kans and having its principal place of business in a State other than the State of which plaintiff is a citizen. 3. The second-named defendant above is either a citizen of the State of a. Ъ. a corporation incorporated under the laws of the State of

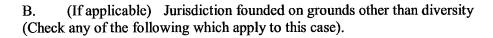
II.

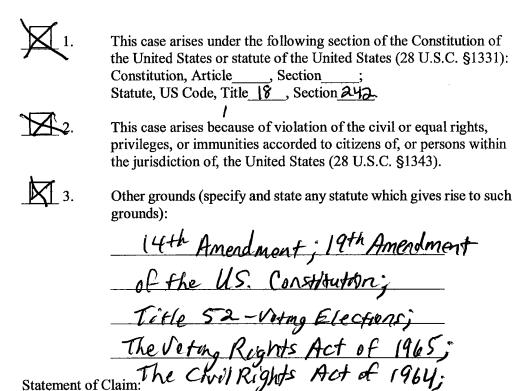
(If there are more than two defendants, set forth the foregoing information for each additional defendant on a separate page and attach it to this complaint.)

Plaintiff states that the matter in controversy exceeds, exclusive of interest and costs, the sum of seventy-five thousand dollars (\$75,000.00).

State other than the State of which plaintiff is a citizen.

and having its principal place of business in a





(State here a short and plain statement of the claim showing that plaintiff is entitled to relief. State what each defendant did that violated the right(s) of the plaintiff, including

dates and places of such conduct by the defendant(s). Do not set forth legal arguments. If you intend to allege more than one claim, number and set forth each claim in a separate paragraph. Attach an additional sheet, if necessary, to set forth a short and plain statement of the claim[s].)

Michael Abbett - S. Deprived Plaintiff of 19th Amendment;

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Michael Abbett - S. Deprived Plaintiff of 19th Amendment;

Injunctive Relief : Revoke Certificate of Dansel Soprice Re-issue
Certificate of Election and sweer in as Sheriff;
-Manuel Ballot Recount; Update Voting Records of
V. Do you claim the wrongs alleged in your complaint are continuing to occur at the present time? Yes No No
VI. Do you claim actual damages for the acts alleged in your complaint? Yes No No
VII. Do you claim punitive monetary damages? Yes No No
If you answered yes, state the amounts claimed and the reasons you claim you are entitled to recover money damages.
- Punitive Damages no less than 25,000,000
- Back Pay of Sheriff Salary ofarting from Dec. 13, 202
Swearing in date.
- Attorney Fees awarded;
- Any other damages court deems proper and just

	VIII.	Administrative Procedures:
		A. Have the claims which you make in this civil action been presented through any type of Administrative Procedure within any government agency? Yes No.
		B. If you answered yes, give the date your claims were presented, how they were presented, and the result of that procedure:
		denied plaintiff of Due Process and
		denied plaintiff of Due Process and
		C. If you answered no, give the reasons, if any, why the claims made in this action have not been presented through Administrative Procedures:
		Pid not make these Federal Claims
		in Notice of Contest. These are original
		claims being made.
IX.	3	
	Please	mark the statement that pertains to this case:
		This cause, or a substantially equivalent complaint, was previously filed in this court as case number and assigned to the Honorable Judge
		Neither this cause, nor a substantially equivalent complaint, previously has been filed in this court, and therefore this case may be opened as an original proceeding.
		Signature of Plaintiff
		Name (Print or Type)
		1/2/6 Delaware Pkwy # 4409 Address PLanca a C 9+4 18 5 66609
		Manera C 9+4 10 5 66609

Kansas City KS 66/09
City State Zip Code

816-562-8973		
Telephone Number		
DESIGNATION OF PLACE OF TRIAL		
Plaintiff designates { Wichita, Kansas City, or Topeka}, Kansas as the (Select One)		
location for the trial in this matter.		
Signature of Plaintiff		
REQUEST FOR TRIAL BY JURY		
Plaintiff requests trial by jury { Yes or No } (Select One)		
Signature of Plaintiff		
Dated; 12(10/15)		