

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

FILED

DEC 10 2021

Clerk, U.S. District Court
By: [Signature] Deputy Clerk

Celisha Towers

(Enter above the full name of the Plaintiff(s))

vs.

Case Number 21-4089-JWL-ADM

Unified Government of Wyandotte and Kansas City, KS

Name

710 N 7th st.

Street and number

Kansas City Kansas 66102

City State ZipCode

(Enter above the full name and address of the
Defendant in this action - list the name and
address of any additional defendants on the back
side of this sheet).

CIVIL COMPLAINT

I. Parties to this civil action:

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any, on the back side of this sheet).

A. Name of plaintiff Celisha Towers

Address 11216 Delaware Parkway #4409

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).

B. Defendant Unified Government of Wyandotte County and ^{Kansas City} _{is} Kansas et al.,
employed at Government

C. Additional Defendants Michael Abbott Election Commissioner;
Board of Canvassers; Henry Couchman Jr; Jeffrey Conway;
Sue Zanne Bishop;

II. 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:

1. Plaintiff is a citizen of the State of Kansas.
2. The first-named defendant above is either
 - a. a citizen of the State of Kansas; or
 - b. a corporation incorporated under the laws of the State of Kansas 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. a citizen of the State of _____; or
 - b. a corporation incorporated under the laws of the State of _____ and having its principal place of business in a State other than the State of which plaintiff is a citizen.

(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).

B. (If applicable) Jurisdiction founded on grounds other than diversity
(Check any of the following which apply to this case).

☒ 1. This case arises under the following section of the Constitution of the United States or statute of the United States (28 U.S.C. §1331):
Constitution, Article _____, Section _____;
Statute, US Code, Title 18, Section 242.

☒ 2. This case arises because of violation of the civil or equal rights, privileges, or immunities accorded to citizens of, or persons within the jurisdiction of, the United States (28 U.S.C. §1343).

☒ 3. Other grounds (specify and state any statute which gives rise to such grounds):

14th Amendment; 19th Amendment
of the U.S. Constitution;
Title 52 - Voting Elections;
The Voting Rights Act of 1965;
The Civil Rights Act of 1964;

III. Statement of Claim:

(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 Abbott employed by Unified Government Purged and rejected
over 15,000 eligible valid ballots in favor of Plaintiff
during General Election on Nov. 2, 2021. Michael Abbott acted
under the Color of Law when he deprived and intentionally
purged over 15,000 voter ballots, violating 14th Amendment, 19th

IV. Relief:

Michael Abbott

(State briefly exactly what judgement or relief you want from the Court. Do not make legal arguments.)

1. The Voting Rights Act of 1965 - Michael Abbott
2. Deprived Citizens of 14th Amendment Rights Act of 1964;
3. Deprived Citizens/Plaintiff of 14th Amendment;
- Michael Abbott 4. Deprived Plaintiff of 19th Amendment;
- Michael Abbott 5. Deprived Plaintiff Title 18 Section 242;

Injunctive Relief: Revoke Certificate of Daniel Softic; Re-issue
Certificate of Election and swear in as Sheriff;
- Manual Ballot Recount; Update Voting Records of
voter turnout rate - votes cast

V. Do you claim the wrongs alleged in your complaint are continuing to occur at the present time? Yes ☒ No ☐

VI. Do you claim actual damages for the acts alleged in your complaint? Yes ☒ No ☐

VII. Do you claim punitive monetary damages? Yes ☒ 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 25,000,000.00.
- Back Pay of Sheriff Salary starting from Dec. 13, 2021
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:

~~NOT~~ NOTICE OF CONTEST; State Judge denied plaintiff of Due Process and allowed untimely Motion; Didn't make these claims specifically;

C. If you answered no, give the reasons, if any, why the claims made in this action have not been presented through Administrative Procedures:

Did not make these federal claims in Notice of Contest. These are original claims being made.

IX. Related Litigation:

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.

Celisha Towers
Signature of Plaintiff

Celisha Towers
Name (Print or Type)

11216 Delaware Pkwy #4409
Address

Kansas City, KS 66109

Kansas City KS 66109
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: 12/10/21
(Rev. 10/15)