

1 Budgetmich  
2 Dentons Hamilton, LLP  
3 2 DCTC, Ste 1200  
4 Hamilton, DC  
5 Plaintiff, pro per

6 COURT OF DEMOCRACYCRAFT

7 HAMILTON, DC

8 BUDGETMICH, Individually,

9 Plaintiff,

10 vs.

11 DEPARTMENT OF PUBLIC AFFAIRS, AND,

12 NACHO, In their official capacity as Deputy Secretary of

13 the Department of Public Affairs

14 Defendant,

Case No.:

**COMPLAINT AND REQUEST FOR  
EMERGENCY INJUNCTION**

15 Plaintiff, BUDGETMICH, complains against Defendants, DEPARTMENT OF PUBLIC AFFAIRS and  
16 NACHO, in their official capacity as Deputy Secretary of Public Affairs, as follows.

**I. Parties**

17 1. Plaintiff, BUDGETMICH (hereinafter "Plaintiff"), is an individual who is currently and was at all  
18 relevant times herein, residing in the Server of Democracycraft, City of Hamilton.

19 2. Defendant, DEPARTMENT OF PUBLIC AFFAIRS (hereinafter "DPA"), is a government agency  
20 which is currently and was at all relevant times herein, located in the Server of Democracycraft, City of Hamilton.

21 3. Defendant, NACHO, (hereinafter "Nacho"), in their official capacity as Deputy Secretary of the  
22 Department of Public Affairs, is an individual who is currently and was at all relevant times herein, residing in the  
23 Server of Democracycraft, city of Hamilton.

24 4. Each defendant ratified the acts and omissions of all other defendants named herein.

25 5. All of the acts and failures to act alleged herein were duly performed by and/or are attributable to  
26 said defendants.

**II. FACTS**

27 6. Plaintiff first joined the Server of Democracycraft on August 12, 2020, two weeks from which  
28 would be August 26, 2020

1  
2 On August 20, at 8:11 PM Eastern, Plaintiff, having qualified through the Democratic Reformist Party  
3 primary, declared intent to contest a seat in the House of Representatives election, nominations for which close on  
4 August 30

5 7. At that time, Plaintiff had been a member of the server for nine (9) days

6 8. On August 21, at 1:21 AM, Nacho informed Plaintiff that Plaintiff was removed from contention  
7 for the House of Representatives, citing D.C. Const. §1.7 (“Elections”)

8 9. D.C. Const. §1.7 reads, in pertinent part “In order to run for the House of Representatives, player  
9 needs to meet these requirements: ... Has joined prior 2 weeks prior to the election.”

10 10. Plaintiff protested this finding, asserting that, by the date of the election, Plaintiff will have been a  
11 member of the server for 14 days

12 11. Nacho replied to Plaintiff, “The election process has started and you have failed to be a member of  
13 the server for 2 weeks.”

14 12. At all relevant times herein, Nacho was the Deputy Secretary of DPA, and all acts and assertions  
15 herein alleged were made by them as an officer of DPA.

### 16 17 **III. CLAIMS FOR RELIEF**

#### 18 **A. Misapplication of Constitutional Provisions**

19 13. Nacho denied the right of a citizen to run for elected office, a right abridged only as explicitly  
20 codified at D.C. Cosnt. §1.7

21 14. Nacho prematurely removed Plaintiff from contention under D.C. Const. §1.7

22 15. Plaintiff is harmed by being unable to exercise this right.  
23

### 24 **IV. PRAYER FOR RELIEF AND APPLICATION FOR EMERGENCY INJUNCTION**

25 **WHEREFORE**, Plaintiff prays for the following relief:

- 26 1. For an emergency injunction reinstating Plaintiff in the House of Representatives race until this court rules  
27 in this matter in order to shield plaintiff from the irreparable damage of being unable to campaign in the  
28 interstice while this court decides
2. For a permanent injunction declaring Plaintiff eligible under the two-week rule to contest the upcoming  
election

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 I declare under penalty of perjury under the law of the Server of Democracy that the foregoing is true  
2 and correct.

3 Dated this 18th day of August, 2020.

4 *Budgetmich*

5 \_\_\_\_\_  
6 Budgetmich  
7 Dentons Hamilton, LLP  
8 2 DCTC, Ste 1200  
9 Hamilton, DC  
10 Plaintiff, pro per  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28