

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

CV120-172

FILED
U.S. DISTRICT COURT
AUGUSTA DIV.

2020 NOV 25 A 9:20

CLERK *[Signature]*
SO. DIST. OF GA.

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	Daniel, Ho Pun and Dana Reeves		
Address	3430 Milledgeville Rd		
	Augusta	GA	30909
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Richmond		
Telephone Number	912-222-2361		
E-Mail Address	dreev4176@yahoo.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) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Brian Kemp		
Job or Title <i>(if known)</i>	Georgia Governor		
Address	206 Washington St. Suite 203 State Capital		
	Atlanta	GA	30334
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Fulton		
Telephone Number	404-656-1776		
E-Mail Address <i>(if known)</i>			

Individual capacity Official capacity

Defendant No. 2

Name	_____		
Job or Title <i>(if known)</i>	_____		
Address	_____		
	_____	_____	_____
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	_____		
Telephone Number	_____		
E-Mail Address <i>(if known)</i>	_____		

Individual capacity Official capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

Individual capacity Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

Individual capacity Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
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III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
During the month of April 2020, I received a notification from Georgia Department of Drivers Service to renew my valid Veterans Drivers License before 31 October 2020. My drivers license did not expire until November 2021. I contacted DDS via phone in Conyers to express my objections. But, they informed me that I needed to report in person to the nearest DDS with valid court certified birth certificate, original Social Security Card and utility bill to prove I was a Georgia resident. On April 17, 2020, I filed a
-
- B. What date and approximate time did the events giving rise to your claim(s) occur?
April 2020 - Received notification from Georgia Dept of Drivers Service to renew my veterans drivers by October 31, 2020 even though my license did not expire until November 2021. Realized later that my new license would have a "Star" denoting that I am a U.S. Citizen and would help to promote a free and fair elections
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- 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?*)
My family and I were denied a free and fair election due to the fact that mail in ballots were counted and received less scrutiny than my family who voted in person and received many levels of scrutiny to ensure we were valid, register voters of the State of Georgia. In my opinion, mail in ballots are illegal in the state of Georgia and should not be counted. Our Civil Rights were violated because we voted in a traditional legal manner that has been a tradition since the founding of the USA over 200 years ago. Mail in ballots were introduced and allowed in 2020 without approval of the State Legislature and the will of the people.
-

Continuation Sheet Civil Rights Complaint

III. Statement of Claim.

A. Where did the events giving rise to your claim(s) occur?

During the month of April 2020, I received a notification from Georgia Department of Drivers Service to renew my valid Veterans Drivers License before 31 October 2020. My drivers license did not expire until November 2021. I contacted DDS via phone in Conyers to express my objections. But, they informed me that I needed to report in person to the nearest DDS with valid court certified birth certificate, original Social Security Card and utility bill to prove I was a Georgia resident. On April 17, 2020, I filed a discrimination complaint(disabled veteran) with U.S. DOJ William Barr with copies to Governor Brian Kemp, and Georgia DDS in Conyers due to COVID lockdown and not being able to report in person to renew drivers license. New Veterans Drivers License would include a "Star" in the upper right hand corner to denote citizenship and the word "Veteran" in the lower right hand corner. I was finally able to obtain new license after several phone calls and reporting to DDS in person with required documents. In the beginning, I was frustrated with roadblocks to obtain new drivers license but felt it was worth it when I reported to the polls in November to vote in the 2020 National Election with my new drivers license. My wife, Ho Pun and daughter, Dana had already renewed their license with "Star" in right hand corner and they were ready to vote. In the State of Georgia, Individuals who mailed in ballots would not receive the same level of scrutiny as those who report in person to vote with a valid drivers license. When we reported to the polls to vote, our drivers license were scanned, and I our identifications were double and triple checked and cross-reference with printouts and computer databases before we were allowed to vote in Richmond County(Augusta), GA. Therefore, My Civil Rights, as well as my wife and daughter's under the equal protection laws were violated due to the level of scrutiny we received prior to being allowed to vote versus those who voted using mail in ballots.

See attached supporting documentation

B. What date and approximate time did the events giving rise to your complaint(s) occur?

April 2020 - Received notification from Georgia Dept of Drivers Service to renew my veterans drivers by October 31, 2020 even though my license did not expire until November 2021. Realized later that my new license would have a "Star" denoting that I am a U.S. Citizen and would help to promote a free and fair elections in Georgia.

July 2020 -A text to my phone (912-222-2361) was sent on July 25, 2020 at 9:22am by Shonte addressing my son, Dale requesting that he vote by mail instead of voting in person.

Daniel Reeves

Page 2 of 2

I believe if I or my son had mailed in an application and voted Republican, our vote would have been discarded. Whereby if I had voted for Democrats my vote would have been faithfully and carefully recorded.

I believe my case is part of a larger effort in Georgia to steal the election from Republican voters. Below is a copy of the text to my phone from Shonte (706-567-7939).

Hi Dale, I'm Shonte w/ Fair Fight Action helping folks get ready to vote. There's an important election in GA coming up on August 11th to help pick our nominees for November, and you can vote by mail NOW! Go to <http://www.GAVBM.com> to get a form to request your ballot ASAP! If you have already sent in your application, make sure to send your ballot back right away once you get it! When you vote by mail, you are making it easier for those who need to vote in person. Be a 🇺🇸. Vote by 🗳️. Hope to be able to thank you for voting! <https://youtu.be/hT8eDhxGGCg>

See attached supporting documentation.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Monumental and immeasurable damage to the health and well being of our family has been done if we no longer have free and fair elections and we are forever not included or prevented from functioning in a free society.

During this election, I have much anxiety and some depression(disabled veteran) thinking about living in Socialist/Marxist Society. As a career U.S. Air Force Veteran and Civil Service employee, I devoted my life(35 yrs) defending and protecting the U.S. Constitution. This will be for naught if the radical left wins control of this country.

Federal Agencies such as the FBI and DOJ no longer support nor work for honest, hardworking and taxpaying American Citizens because they promote a two tier justice. One set of laws for the Rich, the Political Class, the Media, and others who support a Communist/Marxist ideology, and the other set of laws for the average American Citizen who prefer a free Constitutional Republic. This is apparent to the average American who witnessed the harassment, intimidation, abuse, and fake investigations of the President of the United States, Donald J. Trump who actually represent the average American citizen.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Invalidate all mail in ballots in the State of Georgia because they did not receive the same level of scrutiny as my family who showed up in person to vote. Mail in ballots may be illegal in they were not approved by the state Legislature but were approved illegally by the Governor Brian Kemp with his consent decree which allowed unverified mail in ballots.

If this is not approved, then I am requesting the amounts listed below for each member of my family in order to relocate to safest part of United States or possibly move to another country so that my family will be safe. South Korea is my wife's country of origin and it may be our destination.

Amount requested:

Daniel Reeves - \$10,000,000
Ho Pun Reeves - \$10,000,000
Dana Reeves - \$10,000,000

The amount listed would be the amount needed in order to live safely in Americas new Communist Oligarchy. We would be able to provide the money needed to stay on the good side of our Communist Leaders.

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: Nov 24 2020

Signature of Plaintiff

Printed Name of Plaintiff

[Handwritten Signature]
DANIEL REEDS

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City State Zip Code

Telephone Number

E-mail Address

R

Daniel L. Reeves
P.O. Box 7035
Augusta, GA 30905



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THE HONORABLE J. RANDLE HALL, CHIEF JU
U.S. DISTRICT SOUTHERN DISTRICT OF GEO
600 JAMES BROWN BLVD
AUGUSTA, GA 30901

firstclass

