



4. The Defendant, Linda Lamone, is the administrator of elections and holds said office which oversees the actions of the elections process in the State of Maryland.
5. The Defendant, Bobbie S. Mack, is the supervisor of the elections process in the State of Maryland.
6. The Defendant, State of Maryland, is the municipality which held said election where my rights were violated.
7. On or about June 24, 2014, I was a candidate in the election seeking a position as a delegate in the Maryland House of Delegates in district 9A.
8. I was the only Carroll County Republican candidate.
9. Following the election results for the cross-county two-member district are as follows: Carroll precincts; Christopher Eric Bouchat 22.57% (868), Trent Kittleman 21.5% (827), Warren Miller 21.47% (826), Kyle Lorton 17.32% (666), Frank Mirabile 17.13% (659). Howard precincts; Warren Miller 33.10% (2,528), Frank Mirabile 24.22% (1,850), Trent Kittleman 22.87% (1,747), Kyle Lorton 12.49% (954), Christopher Eric Bouchat 7.3% (558). (See attached certified results)
10. The most recent Maryland legislative districts were created on October 20, 2011 when Senate Bill 1 was enacted by the former Governor of Maryland, Martin O'Malley.
11. The current Maryland legislative districts are clearly designed with the intent to manipulate election results, are discriminatory against the non-dominant political party and violate my guaranteed constitutional voting rights.
12. The institutionalized voter discrimination and disenfranchisement are the direct result of Maryland constitution Article III, section 3, which causes one political party in

- power, via election result manipulations, to maintain an unprecedented super majority control of both houses in the General Assembly 97% of the time since 1861.
13. As of the 2014 General Assembly general election results, Democrats control the state legislature by 68.38%.
  14. After I ran a well-funded and fundamentally good campaign equally in both Carroll and Howard counties, the election results, prove that the legislative election districts are discriminatory.
  15. The United States Constitution, Article IV, Section 4, provides that “The United States shall guarantee to every State in this Union a Republican Form of Government.”
  16. The United States Constitution further provides in Amendment XIV, Section 1 that “No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor deny to any person within its jurisdiction the equal protection of the Laws. Section 2 “But when the right to vote at any election for Representatives in Congress, the Executive and judicial officers of a state, or the members of the Legislature thereof, is denied to any inhabitants of such State.”
  17. Finally, the United States Constitution provides in Amendment XV, Section 1 “The right of citizens of the United States to vote shall not be denied or abridged by the United States or by any State.”
  18. The State of Maryland has violated my constitutional right as a voter to elect representatives who represent me fairly and has caused injury to me as a candidate by

creating legislative districts which distort common sense and prohibit me from securing a seat.

19. The United States Constitution “shall be the supreme Law of the Land: and the judges in every State shall be bound thereby, anything in the Constitution or Laws of any State to the contrary notwithstanding.”

WHEREFORE, I humbly and passionately request the Honorable Federal Court:

- a. Enter an Order requiring the representatives of The State of Maryland re-draft and re-configure the Maryland legislative election districts which are fair and reasonable;
- b. Enter an order declaring the enforcement of Maryland Constitution Article III, Section 4 as being violated;
- c. Issue an injunction against the State of Maryland to prohibit the holding of new elections until the legislative districts are fairly and reasonably revised and in compliance with the fore mentioned laws;
- d. Enter an Order awarding me the reimbursement of my campaign costs, court costs and other financial damages and expenses of \$75,000.

  
Humbly Submitted,  
Christopher Eric Bouchat  
5627 Woodbine Road  
Woodbine, MD 21797  
(443) 538-8584  
Plaintiff

8/13/15