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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION**

<p>11 <b>A.W. CLARK,</b></p> <p>12 Plaintiff,</p> <p>13 v.</p> <p>14 <b>SHIRLEY N. WEBER,</b> as California Secretary of State,</p> <p>15 Defendants.</p>	<p>16 <b>COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF</b></p> <p>17 <b>DEMAND FOR JURY</b></p>
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18 **INTRODUCTION.**

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20 **1. Section 3 Disqualification from Holding Office**

21 No person shall be a Senator or Representative in Congress, or elector of  
22 President and Vice-President, or hold any office, civil or military, under the  
23 United States, or under any State, who, having previously taken an oath, as  
24 a member of Congress, or as an officer of the United States, or as a member  
25 of any State legislature, or as an executive or judicial officer of any State, to  
26 support the Constitution of the United States, shall have engaged in  
insurrection or rebellion against the same, or given aid or comfort to the  
enemies thereof. But Congress may by a vote of two-thirds of each House,  
remove such disability.

27 U.S. Const., 14th amend., § 3.  
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105. Defendant putting or allowing the putting of Trump's name on any ballot having to do with the 2024 presidential election would violate plaintiff's Due Process rights, both substantive and procedural, under the Fourteenth Amendment.

106. By virtue of these allegations, plaintiff is entitled to declaratory and injunctive relief.

**Wherefore**, plaintiff requests relief against defendant, as follows:

1. Declaratory relief that Trump is disqualified, prohibited, and barred from the office of president of the United States;
2. Declaratory relief that Trump's name may not be placed on any California ballot for president of the United States;
3. Injunctive relief prohibiting defendant from placing Trump's name on any 2024 presidential election ballot;
4. Costs of suit, including attorneys' fees; and,
7. Such other relief as is just and proper.

**YAGMAN + REICHMANN, LLP**

By: /s/ Stephen Yagman  
**STEPHEN YAGMAN**