

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN
DISTRICT OF TENNESSEE
WESTERN DIVISION**

M. LA-TROY ALEXANDRIA-WILLIAMS

Petitioner,

Docket No.

Vs.

**MARK GOINS, official capacity
As Coordinator of Tennessee Elections
MARY MANCINI, official capacity
As Chairwoman of the Tennessee Democratic Party
LINDA PHILLIPS,
SHELBY COUNTY ELECTION COMMISSIONER,**

Respondents.

**COMPLAINT FOR MONEY DAMAGES ,DECLARATORY JUDGMENT
AND INJUNCTIVE RELIEF**

I Introduction

Comes now Plaintiff M. Latroy Williams and brings suit against Defendants Tennessee State Democratic Executive committee, Mary Mancini Mark Goins and Linda Phillips for wrongful ouster from the 9th Congressional District race and wrongful termination of his candidacy for the 9th congressional Seat in West Tennessee in the 2020 election.

II. PARTIES

- 1. Petitioner M. La-Troy Williams is a resident citizen of Memphis Shelby County , Tennessee.**
- 2. Mark Goins is Coordinator of Tennessee Elections through the Tennessee Division of Elections**
- 3. Mary Mancini is the Chairwoman of the Tennessee Democratic Party**
- 4. Linda Phillips is the Administrator of the Shelby County Election Commission**

III. FACTS

- 1. Petitioner intended to run for election as a Democratic candidate in August 2020 primary election for a seat as a Member of the United States House of Representatives**
- 2. (“U.S. Congress”). Petitioner is qualified to hold a seat in the U.S. Congress.**
- 3. Petitioner met all other qualifying procedures for House of Representatives as set forth by Tennessee Code Annotated title 2, chapter 5.**
- 4. Petitioner’s nominating petition provides that Petitioner seeks to run as a candidate in the Democratic primary election.**
- 5. Tennessee Code Annotated Section 2-5-101 provides that the primary candidates for U.S. Congress “shall qualify by filing all nominating**

petitions, including any duplicate nominating petition.

6. Petitioner qualified by filing all nominating petitions, including any duplicate nominating petitions by the applicable deadlines.

7. Petitioner was informed by the Shelby County Election Commission that he qualified by filing all nominating petitions, including any duplicate nominating petitions by the applicable deadlines.

8. Tennessee Code Annotated Section 2-13-201 sets forth the conditions for names being shown on a ballot and provides as follows:

No person's name may be shown on a ballot as the nominee of a political Party for the offices named in § 2-13-202 or for any office to be voted on by the voters of a county, unless the political party:

- (1) Is a statewide political party or a recognized minor party; and**
- (2) He has nominated the person substantially in compliance with this chapter.**

Tenn. Code Ann § 2-13-201.

9. Tennessee Code Annotated Section 2-13-202 sets forth the mandatory method for how the statewide political party must nominate its candidates in elections for Governor, members of the general assembly, United States Senator and members of the United States House of Representatives.

10. Tennessee Code Annotated Section 2-13-202 provides:

2-13—202. Office for which candidates are chosen in primary elections.

Statewide political parties shall nominate their candidates for the following

Offices by vote of the members of the party in primary elections at the regular August election:

- (1) Governor;**
- (2) Members of the general assembly;**
- (3) United States senator; and**
- (4) Members of the United States house of representative**

11. Primary candidates who wish to run for any other offices, other than those listed in Tenn. Code Ann. § 2-13-202 may be nominated in other ways, or by “any method authorized under the rules of the party.” See Tenn. Cod Ann. § 2-13-203.

12. Tennessee Code Annotated Section 2-13-203 provides in pertinent part:

2-13-203. Methods of nomination for other offices.

- (1) Statewide political parties may nominate their candidates for any office other than those listed in § 2-13-202 by any method authorized under the rules of the party or by primary election under this title.**

13. Tennessee Code Annotated Section 2-13-203 does not apply to Petitioner’s bid to run for U.S. Congress because he is running for one (1)

