

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

Augusta Division

Neil Keith Singleton

Case No.

CV 123 - 123

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Burke County Georgia
Burke County Sheriffs Department
Burke County Sheriff Alfonzo Williams

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

FILED
U.S. DISTRICT COURT
SAMAHRAH DIV.
2023 AUG 29 P 12: 21
CLERK
SO. DIST. OF GA.

COMPLAINT AND REQUEST FOR INJUNCTION

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	Neil Singleton
Street Address	1701 Little Flock Church Rd
City and County	Collins Tattnall
State and Zip Code	GA 30421
Telephone Number	9126674161
E-mail Address	neilks1975@outlook.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). Attach additional pages if needed.

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

Defendant No. 1

Name Burke County Georgia
Job or Title *(if known)* Board of Commisioners
Street Address 602 Liberty St
City and County Waynesboro Burke
State and Zip Code GA 30830
Telephone Number 7065542324
E-mail Address *(if known)* merv.waldrop@burkecounty.ga.gov

Defendant No. 2

Name Burke County Sheriffs Department
Job or Title *(if known)*
Street Address 225 GA-24
City and County Waynesboro Burke
State and Zip Code GA 30830
Telephone Number 7065542133
E-mail Address *(if known)*

Defendant No. 3

Name Alfonzo Williams
Job or Title *(if known)* Sheriff
Street Address 225 GA-24
City and County Waynesboro Burke
State and Zip Code GA 30830
Telephone Number 7065542133
E-mail Address *(if known)*

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.
 First Amendment

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Neil Singleton, is a citizen of the State of *(name)* Georgia

b. If the plaintiff is a corporation

The plaintiff, *(name)* Burke County Government, is incorporated under the laws of the State of *(name)* Georgia and has its principal place of business in the State of *(name)* Georgia

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Alfonzo Williams, is a citizen of the State of *(name)* Georgia. Or is a citizen of *(foreign nation)*

b. If the defendant is a corporation

The defendant, *(name)*, is incorporated under the laws of the State of *(name)*, and has its principal place of business in the State of *(name)*.
Or is incorporated under the laws of *(foreign nation)* and has its principal place of business in *(name)*.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. 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?
Social Media Pages Facebook and LinkenID

B. What date and approximate time did the events giving rise to your claim(s) occur?
From May 1st 2023 and ongoing

- 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?)
The Official Burke County Sheriffs department and the Page of the Sheriff blocked my ability to comment after exposing deeds committed that cost taxpayers money. The Department and the Sheriff have both blocked ability to comment on postings but allowed others to comment. The Sheriff selectively blocks the ability to comment on random posts.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am asking the court to issue an emergency injunction ordering the Sheriff as well as the Sheriffs Department social media pages on any platform to unblock all citizen and turn commenting on for all posts unless those comment violate laws or rules of that social media site.

I ask the court to award a punitive damage of \$50,000.00 for violations of civil rights for the willful and knowingly actions and the Sheriffs threats to release information about the Plaintiff as a form of retaliation.

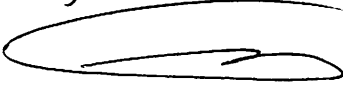
Per Burke County Sheriff's Dept Social Media Rules.
They welcome and encourage public comments on
Their page. The Dept selectively blocks those that
speak against him and many others.

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: August 24th 2023
Signature of Plaintiff 
Printed Name of Plaintiff Neil K Singleton

B. For Attorneys

Date of signing:
Signature of Attorney
Printed Name of Attorney
Bar Number
Name of Law Firm
Street Address
State and Zip Code
Telephone Number
E-mail Address

VI. Certification and Closing

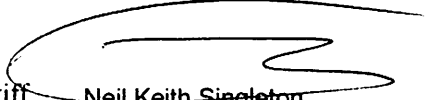
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported 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.

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Date of signing: August 24th 2023

Signature of Plaintiff



Printed Name of Plaintiff Neil Keith Singleton

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

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.

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.

The plaintiff seeks an agreement that the defendant will not censor any person on his official government used pages that he uses to govern from as long as he is an elected person.

The defendant seeks punitive damages for the willful and negligent conduct by the defendant for a violation of civil rights in the amount of ~~\$30,000.00~~ ^{US} \$50,000.00

The federal courts have ruled several times and have warned elected officials to stop this practice of censoring citizens on social media sites. As an elected person they should be penalized harshly to set examples and they should be beacon of freedom of speech.