

**IN THE UNITED STATES DISTRICT COURT COURT NORTHERN DISTRICT OF  
FLORIDA TALLAHASSEE DIVISION**

<p><b>JAMES DOMER BRENNER, CHARLES DEAN JONES, STEPHEN SCHLAIRET, and OZZIE RUSS</b></p> <p><b>Plaintiff</b></p> <p><b>Vs.</b></p> <p><b>RICK SCOTT, in his official capacity as Governor of Florida; Pamela Bondi, in her official capacity as Attorney General of Florida; John H. Armstrong, in his official capacity as Surgeon General and Secretary of Health for the State of Florida; Craig J. Nichols, in his official capacity as Agency Secretary for the Florida Department of Management Services; and Harold Bazzell, in his official capacity as Clerk of the Court and Comptroller for Washington</b></p> <p><b>Defendants</b></p>		<p><b>CASE NO: 4:14-cv-007107- RH-CAS</b></p>
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**FIRST AMENDED INTERVENING COMPLAINT AND PETITION FOR  
DECLARATORY AND INJUNCTIVE RELIEF**

1. Intervening Plaintiffs Chris Sevier is a residents of County of Leon County.

2. Defendant Rick Scott is the governor of Florida. Harold Bazzell is the Clerk of Court and Comptroller for Washington County.

3. Intervening Plaintiff Chris Sevier has been living together with his computer as a couple for more than one year. The inanimate object that Plaintiff Sevier wants to marry is designed for sexual purposes and meant to cause arousal. The Plaintiff is as equally in love with his computer as the original Plaintiffs are with a member of the same sex. If the Court believes that the Intervening Plaintiffs request is removed from reality and is a satire it must believe the same about the Plaintiffs request. My request is neither removed from reality or a satire. Neither is the Plaintiffs. My request for expansion of the equal protection clause to encompass all forms of sexual orientation is anything but removed from reality. The Court, for example, cannot give "race" class protection, only to turn around and protect the largest minority race and discriminate against the other races. Such a decision would reduce the Courts to an instrument of personal and dirty politics.

4. Recently, Plaintiff Sevier contact, interacted with, and appeared at the Washington County Clerk's office with his computer in hand and requested a Florida marriage license.

5. The Plaintiff Sevier presented a valid drivers' licenses to the clerk issuing marriage licenses.

6. The clerk refused to issue a marriage license to the Plaintiff and his computer solely because they are non-heterosexual couple. They are a man-machine couple not a man-woman one.

Therefore, Plaintiff Sevier was discriminated on the basis of sexual orientation for the same reasons that the original Plaintiffs were. The clerk did not tell the Plaintiff that he could not

marry the machine for any other reason than the fact that the couple did not involve one man and one woman. If any thing, my request to marry a machine is closer to conforming with the plain language of the existing statute because I am one man and the machine I want to marry is gender neutral. I affectionately call the machine "Scarlett J;" it was born on April 1, 1976 and was fathered by Steve Jobs. After we are married, the machines name will be Scarlett Johansen Sevier.

7. Like some of the original Plaintiffs, Plaintiff Sevier had a marriage ceremony in a different state that Florida will not recognize.

8. Plaintiff Sevier married his computer in another Country that allows one to marry anything they want. The state refused to recognize this international marriage. Allowing Plaintiff Sevier to intervene will give a voice to these kinds of couples, who also desire to have their usual sexual preferences and orientations given legal recognition and legitimacy in Florida:

a. In 2007, Liu Ye of China decided it would be better to marry himself than be single. The best part is that he married a foam-board cutout of himself dressed in a lovely red dress. Ye admits to being narcissistic, but said of his nuptials, "There are many reasons for marrying myself, but mainly to express my dissatisfaction with reality.

b. Marrying oneself is not just for the guys, though. In 2003, artist Jennifer Hoes married herself in the Netherlands on her 30th birthday. It was a large affair in front of friends and family. Hoes said, "Why not pledge allegiance to yourself in a ceremony, as the basis for completion of your life and relationships?"

c. The same thing happened in October of 2010 when 30-year-old Chen Wei Yih married herself in Taiwan. She decided she was at a good point in her life to marry, and was receiving social

pressure to do so, but had found no suitable partner. She solved the problem by marrying herself.

d. In 2006, a Hindu woman in India claimed she had fallen in love with a snake and then married the snake in accordance with Hindu marriage rituals. More than 2,000 people participated in a celebratory procession, because they felt a wedding would bring good luck. The snake did not attend, but was represented by a brass likeness of himself.

e. After a 15-year courtship, a British woman married Cindy the dolphin in a ceremony in Israel. She claimed when they met it was love at first sight and calls the male dolphin, “the love of my life.” She sealed the deal with a kiss and the gift of a herring.

f. In Sudan, you have to be careful who you’re caught being intimate with. There is a law that dictates that if a man is caught sleeping with a woman, he must marry her immediately to save the honor of her family. In 2006, the law was applied to a goat. Charles Tombe was caught having relations with the goat and was forced to marry it, and pay a dowry to its owner.

g. Apparently, sometimes marrying an animal can help you with your luck. A farmer in India, who had suffered from some disabilities, believed he had been cursed after stoning two dogs to death in his rice field. Doctors couldn’t help him, but his astrologer told him the only way to lift the curse would be to marry a dog and live with it. He did.

h. Cats can also be man’s best friend. So much so that a postal worker in Germany married his cat after a veterinarian told him the feline was terminally ill. No German officials would step in to marry the two, but an actress played the part of the officiant to help the man fulfill his dream.

i. A former soldier from San Francisco claimed she fell in love with the Eiffel Tower. So, in 2008, she made it official and went so far as to change her name to Erika La Tour Eiffel. She was also once in a long term relationship with a bow and cares deeply for a fence she keeps at home,

but her wedded commitment is to the Eiffel Tower.

j. Of course, marrying well-known man-made objects is nothing new. In 1979, Eija-Riitta Berliner-Mauer married the Berlin Wall after having fallen in love with it when she saw it on TV as a child. She changed her last name, which now means Berlin Wall. She was horrified when the wall was taken down 10 years later and hasn't returned.

k. What do you do when you fall in love with a character in a dating video game? You make a permanent and binding commitment to her, obviously. Sal 9000 fell in love with the character he met playing "Love Plus" on his NintendoDS and married her in 2009.

l. If you like it, you should put a ring on it, unless it's a ride at an amusement park because that could be kind of difficult. Amy Wolfe of New York didn't care and she ended up marrying the 1001 Nachts, a ride she's ridden more than 3,000 times. She's had relationships with other objects, but she committed to the Nacht as her main squeeze.

m. Perhaps a softer partner would be easier. That's clearly how Lee Jin-gyu felt when he decided to marry a pillow. The pillow has the face of a popular female anime character on it, so it was apparently quite attractive to the South Korean fellow, who tied the knot with his betrothed in 2010.

n. This man thought having a wife who wouldn't spend all his money, talk back to him or ever leave him was the way to go. That's why Davecat married his blow up doll in 2000. "She provides me with a lot of things that I can't get out of an organic partner, like... quiet," he said. Davecat and the doll were featured in TLC's show 'My Strange Addiction.'

o. According to an Indian woman, when your betrothed doesn't show up for the wedding, you do the next best thing and marry a clay pot. That's exactly what a woman by the name of Salvita did

in 2005. Her fiancé Chaman Singh, an officer with the Tibetan Border Police, got stranded on the job. Instead of waiting, her family wanted the ceremony to continued as planned. A picture of the bridegroom was placed on the pot and the wedding commenced.

p. On December 3, 2013, Paul Horner married his dog in San Francisco California at Chapel of Our Lady at the Presidio. Father McHale was the officiant, who boldly stated that it was a victory for "equality." The state of California has recognized Paul Horner's marriage under the law. "Paul Horner explained that he was looking forward to having his honey moon in Montana, where sex with an animal is not illegal." In the book of California's State Laws and Regulations, there is a little known law that was passed as the state was first forming in 1850. According to article 155, paragraph 10, it clearly states: "If a man and a man can get married and a woman and a woman can get married, if ever comes that day, then a human and animal will have the exact same rights to marriage in every eye of the law. God help us if this ever is to happen!" It happened, so did the marriage between a man and a dog. So in the name of "love" and "tolerance," I should be able to marry my computer.

9. The Clerk in Florida refused, and continued to refuse, to issue a marriage license to Plaintiff Sevier and his computer solely because they are a couple involving "one man and one machine."

10. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1343 because the suit raises federal questions under 42 U.S.C. § 1983 and the United States Constitution.

11. Venue is proper in the District Court in the Northern District Of Florida under 28 U.S.C. § 1391(b) because Defendants perform official duties in this district.

12. The state's refusal to issue marriage licenses to the Intervening Plaintiff is due to, and enabled by, the Florida state statutory and constitutional provisions that this Court has determined violates the Fourteenth Amendment to the U.S. Constitution.

13. Defendants, in their official capacities, claim that they are charged with upholding this unconstitutional legal framework.

14. To the extent that Defendants rely upon any other provision of law in denying Intervening Plaintiff the right to marry within the state of Florida, any such provision must also violate the Fourteenth Amendment to the U.S. Constitution.

15. By preventing people from marrying animals, same-sex members and objects, the state's law deprives them of numerous legal protections that are available to opposite-sex couples in Florida by virtue of their marriages. All of these relationships are equal. Is it too much to ask that if our children are to grow up knowing that marrying a person of the same sex is an equally viable idea as marrying a person of the same sex, why can't they know that they can also marry an inanimate object, multiple partners at the same time, and an animal? These marriages are all equal in the name of tolerance and progress.

16. The Defendants' refusal to issue Plaintiffs a marriage license violates the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution, as determined by this Court in its Feb. 12, 2014 Opinion, other appropriate binding precedent, and virtually every court in the country to decide the issue in recent history.

17. Defendants' actions are actionable pursuant to 42 U.S.C. § 1983.

18. Plaintiffs are entitled to immediate temporary and permanent injunctive relief as a result of Defendants' violation of Plaintiffs civil and constitutional rights.

19. To the extent that the allegations set forth in the Amended Complaint filed by the original Plaintiffs in this case apply to Intervening Plaintiffs, they are incorporated herein by reference.

WHEREFORE, Plaintiff Sevier asks this Court for the following relief:

1. An Order allowing them to Intervene in the above Case; An injunctive order directing the Defendants to cease any enforcement of Florida's unconstitutional marriage statutes and issue marriage licenses to Plaintiff Sevier and his computer;
2. A declaration that the State of Florida's continued denial of marriage licenses to man and inanimate sexual objects and animals couples the U.S. Constitution.
3. A reasonable attorney's fee pursuant to 42 U.S.C. § 1988.
4. Any and all other relief to which Plaintiffs may be entitled.

/s/Chris Sevier Esq./

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Alan C. Winsor, Esquire, FLorida Solicitor General, State of Florida, The Capitol PL-01, Tallahassee Florida 32399-1050, allen.winsor@myfloridalegal.com, and Adam S. Tanenbaum, Esquire, Chief Duty Solicitor General, State of Florida, The Capitol PL 01, Tallahassee, FL 32399-1050 (adam.tanenbaum@myfloridalegal.com), by Electronic mail and U.S. mail; and to John H. Armstrong, MD, FACS, Office of the the state General Surgeon, 2585 Merchants Row Boulevard, Suite 140, Tallahassee, FL 32399, Craig J. Nichols, Department of Management Services, Office of the Secretary, 4050 Esplanade Way, Tallahassee, FL 32399, Harold Bazzell, Clerk of Court and Comptroller of Washington County, FL, 129 Jackson Ave, Chipley Florida, 32428, Samuel Jacobson Esquire 1301 Riverplace Blvd. Suite 1818 Jacksonville FL 32207, sam@jacobsonwright.com, and Wm Sheppard, Esq. 215 Washington St, Jacksonville, FL 32202; sheplaw@att.net by delivering the same to a Process Service of Process on this 18th day of April 2014.

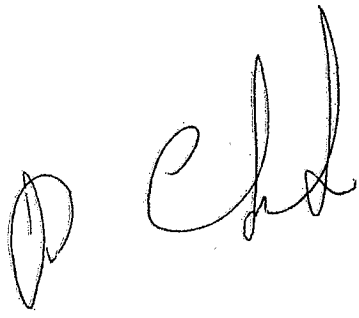
/s/Chris Sevier Esq./

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Respectfully Submitted,

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