

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT
IN AND FOR ST. JOHNS COUNTY, FLORIDA

MANUEL P. ASENSIO,

Case No.: CA-26-0993

Division 55

Plaintiff,

v.

EVAN POWER, individually,

Defendant.

SUMMONS

THE STATE OF FLORIDA:

To Each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the Second Amended Complaint FILED July 8, 2026 (FILING # 251988186) in this action on the defendant named below:

TO DEFENDANT:

EVAN POWER, individually
1117 Mercer Drive
Tallahassee, Florida 32312

EVAN POWER, individually
420 E. Jefferson St., Suite 3
Tallahassee, Florida 32301

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached Second Amended Complaint with the Clerk of this Court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case.

You must also serve a copy of your written response on Plaintiff Manuel P. Asensio at the address below. If you do not file your written response on time, you may lose the case, and the Court may enter a default against you for the relief demanded in the Second Amended Complaint.

Plaintiff for service of written response:

MANUEL P. ASENSIO
5122 A1A South
St. Augustine, Florida 32080
Telephone: (561) 946-1000
Email: info@stjohnsgop.org

DATED on 7/9/2026, 2026.

Brandon J. Patty

CLERK OF THE CIRCUIT COURT

By: _____

Deputy Clerk





REQUESTS FOR ACCOMMODATIONS BY PERSONS WITH DISABILITIES If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Court Administration – ADA Coordinator, 1769 E. Moody Blvd., Bldg. 1, 2nd floor, Bunnell FL 32110, (386) 257-6096, ADARequest@circuit7.org, at least 7 days before your scheduled court appearance, or immediately on receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.

THESE ARE NOT COURT INFORMATION NUMBERS



SOLICITUD DE ADAPTACIONES PARA PERSONAS CON DISCAPACIDADES

Si usted tiene una discapacidad y necesita alguna adaptación para participar en este proceso judicial, tiene derecho a que se le proporcione cierta asistencia sin costo alguno. Por favor comuníquese con las oficinas de Administración del Tribunal, Coordinador(a) de la Ley sobre Estadounidenses con Discapacidades (ADA, por sus siglas en inglés) al (386) 257-6096, ADARequest@circuit7.org, 1769 E. Moody Blvd., Edificio 1, Piso 2, Bunnell FL 32110, por lo menos 7 días antes de su audiencia o tan pronto como reciba esta notificación si su cita está dentro de un plazo menor de 7 días; si usted tiene una discapacidad del habla y/o auditiva, llame al 711.

ESTOS NÚMEROS TELEFÓNICOS NO SON PARA OBTENER INFORMACIÓN JUDICIAL

**IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT
IN AND FOR ST. JOHNS COUNTY, FLORIDA**

MANUEL P. ASENSIO,

Plaintiff,

v.

**Case No.: CA-26-0993
Division 55**

EVAN POWER, individually,

Defendant.

_____ /

SECOND AMENDED COMPLAINT

Plaintiff Manuel P. Asensio sues Defendant Evan Power, individually, and alleges:

I. NATURE OF THE ACTION

1. This action is brought by Plaintiff Manuel P. Asensio, a qualified Republican candidate for United States Representative in Florida's Sixth Congressional District, against Defendant Evan Power, individually. Power currently serves as Chairman of the Republican Party of Florida, as a member of the Republican National Committee, as a qualified Republican candidate for federal office, as a registered Florida lobbyist, and as a professional political operative. This action does not seek relief against Republican voters, ordinary Republican Party members, county-level volunteers, precinct workers, delegates, donors, or the Republican electorate. It concerns Power's individual conduct and his use of Republican Party titles, mechanisms, authority, and influence.
2. The dispute did not begin with the 2026 congressional race. On June 21, 2024, Plaintiff and Robert A. Harris, as co-chairmen of the St. Johns Presidential Executive Committee, filed a written Request for Hearing with the Republican Party of Florida concerning the Committee's charter application, the www.stjohnsgop.org domain, the use of GOP identifiers, Republican federal-judiciary policy, alleged improper bias toward Katherine Cammack, and issues governed by RPOF rules and regulations. That Request for Hearing expressly alleged that Defendant Power made false statements about both the Asensio v. Cammack matter and the GOP domain application. That allegation is central to this action.
3. On September 23, 2024, the St. Johns Presidential Republican Executive Committee filed a supplement and amendment to the June 21, 2024 Request for Hearing. The supplement tied the dispute to WIPO Procedural Order No. 1 in Republican Party of

Florida v. Manuel Asensio, the RNC's authority over the GOP mark, the alleged use of trademark proceedings as a strategic action against Republican political speech, the Cammack dispute, the Judicial Conduct Act, the Rules Enabling Act, the United States Judicial Conference, and Plaintiff's challenge to Federalist Society-aligned legal policy inside Republican Party structures. The supplement further alleged that the dispute involved Power's use of political raw will and force against Plaintiff and St. Johns GOP.

4. On October 8, 2024, the WIPO panel denied the Republican Party of Florida's complaint concerning www.stjohnsgop.org. The panel recognized that Plaintiff's website appeared noncommercial in nature, consisted primarily of criticism and text concerning Plaintiff's views, and was used to express genuinely held views about Republican Party federal-judiciary policy and alleged federal judicial corruption. The WIPO decision did not decide whether Plaintiff's views were correct, but it confirmed that the broader dispute was not a mere bad-faith commercial trademark matter and that the parties' larger controversy exceeded the limited scope of a domain-name proceedings.
5. Plaintiff alleges that Power's present conduct continues the same course of misconduct identified in the June 21, 2024 grievance, expanded in the September 23, 2024 supplement, and exposed by the October 8, 2024 WIPO decision. Plaintiff alleges that Power is not a neutral party administrator in relation to Plaintiff, but an adverse political actor who has acted with hostility toward Plaintiff's candidacy, Plaintiff's Republican political advocacy, Plaintiff's challenge to unexplained per curiam affirmances, Plaintiff's criticism of judicial self-protection, and Plaintiff's challenge to Federalist Society-aligned legal policy within Republican presidential, Department of Justice, White House Counsel, and federal judicial-policy channels.
6. Plaintiff further alleges that Power has used, permitted, encouraged, or benefited from Republican Party of Florida-branded authority and party mechanisms to favor incumbent Randy Fine over Plaintiff in the Republican primary for Florida's Sixth Congressional District. Plaintiff alleges that Power has denied, burdened, or interfered with Plaintiff's equal access to Republican county-level and congressional-district mechanisms, while allowing party machinery, titles, influence, and institutional credibility to be used to promote Fine, protect Fine, and malign or marginalize Plaintiff, Plaintiff's candidacy, and Plaintiff's political ideas.
7. RPOF Rule 8 is central to this action because it governs when Republican Party organs and Republican Executive Committees may endorse, certify, screen, recommend, or support one Republican candidate over another in a contested Republican primary. Plaintiff alleges that any purported Republican Party of Florida endorsement, recommendation, certification, screening, or support in a contested Republican

congressional primary must comply with Rule 8 and the party's governing procedures. Plaintiff further alleges that county Republican Executive Committees do not possess general authority to endorse or support one Republican candidate over another in a contested Republican primary for federal office, including a race for the United States House of Representatives.

8. Power's conduct has injured Plaintiff's rights, reputation, candidacy, political participation, ballot-related interests, and associational standing as a Republican candidate and Republican Party member. Plaintiff brings this action to redress Power's individual misconduct, to prevent the continued misuse of Republican Party machinery and titles for personal, factional, or conflicted purposes, and to protect Plaintiff's equal right to participate as a qualified Republican candidate without being maligned, excluded, or disadvantaged by an adverse political actor acting under color of party authority.

II. JURISDICTION, VENUE, AND AUTHORITY

A. Jurisdiction and Authority

9. The injury is not merely political or procedural. Plaintiff alleges that Power's conduct has attacked Plaintiff's personal integrity, honor, credibility, truthfulness, courage, and moral standing. Plaintiff's Republican constitutional advocacy is not a campaign device or abstract policy position; it arises from Plaintiff's deepest personal convictions concerning truth, judicial corruption, constitutional duty, religious and parental rights, Republican loyalty, and the obligation of citizens to confront governmental corruption. Plaintiff alleges that Power's false statements and misleading implications were intended and understood to strike at Plaintiff personally by portraying him as dishonest, unstable, discredited, unserious, unfit, or unworthy of trust, when Plaintiff's record shows sustained Republican political advocacy, formal grievance filings, litigation, and a successful defense of his GOP-domain advocacy before WIPO.
10. This action is brought against Defendant Power individually. Plaintiff does not sue the Republican Party of Florida, the Republican National Committee, Republican voters, county Republican Executive Committees, county-level volunteers, precinct workers, delegates, donors, or ordinary Republican Party members. Plaintiff seeks relief directed to Power's individual conduct, statements, decisions, and wrongful use of party machinery, titles, authority, and influence.
11. This Court has authority to declare the rights, status, powers, privileges, and legal relations of the parties, including whether Defendant Power's conduct, use of party authority, and asserted or implied party endorsement activity violated Plaintiff's rights

or exceeded, misused, manipulated, or circumvented the governing rules and procedures of the Republican Party of Florida, including RPOF Rule 8.

12. This Court has authority to grant legal, declaratory, injunctive, equitable, and supplemental relief available under Florida law, including declaratory relief, temporary and permanent injunctive relief, damages, costs, and such other relief as is necessary and proper to protect Plaintiff's rights, reputation, candidacy, political participation, ballot-related interests, and associational standing.
13. Defendant Power is subject to personal jurisdiction in Florida because he resides or works in Florida, serves as Chairman of the Republican Party of Florida, acts within Florida political and party structures, is a qualified Republican candidate for federal office in Florida, and is publicly identified as a registered Florida lobbyist affiliated with a Florida governmental consulting and government-relations firm.
14. The authority for this action includes Florida law governing civil actions for injury to rights, reputation, political participation, and legally protected interests; Florida law governing declaratory relief; Florida venue law; and the governing rules, procedures, and internal authority structures of the Republican Party of Florida, including Rule 8, which defines and limits when party organs and Republican Executive Committees may endorse, certify, screen, recommend, or support candidates in contested Republican primaries.

B. Venue

15. Venue is proper in St. Johns County, Florida, because the causes of action accrued, in whole or in substantial part, in St. Johns County. Plaintiff resides, campaigns, organizes, communicates with voters, seeks support, raises funds, develops political relationships, and suffers political, reputational, associational, and campaign injury in St. Johns County.
16. Plaintiff is a qualified Republican candidate for United States Representative in Florida's Sixth Congressional District. Florida's Sixth Congressional District includes St. Johns County, Flagler County, Putnam County, Marion County, Volusia County, and Lake County. Defendant Power's alleged conduct concerns Plaintiff's campaign for that district and the Republican political mechanisms operating within that district, including the Republican voters, activists, donors, media audiences, party participants, and political networks located in St. Johns County.
17. Defendant Power's alleged misuse of Republican Party titles, machinery, endorsement authority, institutional influence, and RPOF-branded credibility was directed at, intended to affect, and did affect Plaintiff's campaign, reputation, ballot-related interests, access to Republican mechanisms, and standing among Republican voters,

activists, donors, supporters, party participants, and media audiences in St. Johns County and throughout Florida's Sixth Congressional District.

18. The injury alleged in this action is not confined to Tallahassee or to the physical location from which Defendant Power may have acted. The injury accrued where Plaintiff's campaign, reputation, political participation, and associational rights were harmed, including St. Johns County. Any statements, endorsements, recommendations, party communications, media contacts, digital publications, political signals, or uses of party authority concerning Plaintiff, Randy Fine, or the Republican primary for Florida's Sixth Congressional District were naturally and foreseeably directed into the district, including St. Johns County.
19. St. Johns County is a central location of Plaintiff's political activity and injury. It is also part of the regional political and media market affected by Defendant Power's conduct, including the media corridor running from Daytona Beach and Volusia County north through Flagler County, St. Johns County, St. Augustine, and Jacksonville. That corridor includes digital, print, television, radio, and political-news outlets and audiences that influence Republican voters and political participants in Florida's Sixth Congressional District.
20. Relevant regional media outlets and audiences include, without limitation, Daytona Beach and Volusia County outlets; St. Johns County and St. Augustine outlets; Jacksonville and First Coast outlets; radio, podcast, business, legal, and political-news platforms; and regional digital-news platforms serving or influencing Republican voters, activists, donors, and political participants in Florida's Sixth Congressional District.
21. Defendant Power's alleged conduct was capable of reaching, influencing, and injuring Plaintiff before Republican voters, donors, activists, party participants, political media, and campaign audiences in St. Johns County and throughout the district. Plaintiff's claims therefore accrued in St. Johns County at least in substantial part when Plaintiff suffered injury there to his candidacy, reputation, political participation, ballot-related interests, access to Republican mechanisms, and associational rights.
22. Venue is proper under section 47.011, Florida Statutes, because Plaintiff's causes of action accrued in St. Johns County at least in part. Plaintiff does not plead venue based on property in litigation. Plaintiff pleads venue based on accrual of the causes of action, injury to Plaintiff in St. Johns County, and the foreseeable effect of Defendant Power's alleged conduct on Plaintiff's campaign and Republican political participation in St. Johns County and throughout Florida's Sixth Congressional District.

III. PARTIES

A. Plaintiff Manuel P. Asensio

23. Plaintiff Manuel P. Asensio is an individual residing in Florida, a Republican voter, a Republican Party member, and a qualified Republican candidate for United States Representative in Florida's Sixth Congressional District in the 2026 election. Plaintiff is on the ballot for the Republican primary election scheduled for August 18, 2026. Plaintiff is not an outsider to the Republican Party, a political adversary of Republican voters, or a stranger to Republican associational rights. Plaintiff is a current Republican congressional candidate whose rights, reputation, ballot status, political participation, and standing within the Republican Party have been directly affected by Defendant Evan Power's conduct.
24. Plaintiff has previously asserted and prevailed in litigation involving the right of Republican Party members and Republican political advocates to use Republican and GOP identifiers in connection with criticism, commentary, and advocacy concerning Republican Party policy. In *Republican Party of Florida v. Manuel P. Asensio*, WIPO Case No. D2024-3099, the Republican Party of Florida brought a proceeding concerning Plaintiff's use of the "GOP" name and mark in connection with St. Johns Republican political advocacy. The WIPO panel recognized that the Republican National Committee owned the GOP mark and that the Republican Party of Florida claimed only a non-exclusive license to use it in Florida. The panel further found that Plaintiff's website appeared to be noncommercial in nature, consisted primarily of criticism and text regarding Plaintiff's views, and was used to express genuinely held views about the Republican Party, federal judicial corruption, and related issues. The complaint was denied. That prior proceeding is directly relevant here because it shows that Plaintiff is not attacking the Republican Party as such; he is a Republican political advocate whose right to criticize and participate within Republican politics has already been tested and sustained in an adversarial proceeding.
25. Plaintiff has also pursued political and legal advocacy arising from his 2020 campaign for the Republican Party's nomination for United States Representative in Florida's Third Congressional District and from his litigation against Katherine Cammack and others. Plaintiff's advocacy concerns, among other things, the use of Florida per curiam affirmances to prevent meaningful appellate review, to obstruct access to the Florida Supreme Court and federal courts, and to shield governmental and political actors from constitutional accountability. Plaintiff's position in this action grows out of the same continuing course of Republican, constitutional, and judicial-accountability advocacy, including his work to challenge what he contends is the unlawful concentration of unchecked judicial power.

26. Plaintiff is also the founder of Citizens United Against Judicial Supremacy, LLC, a Florida entity formed to advance constitutional education and advocacy concerning the Declaration of Independence, the United States Constitution, the Bill of Rights, the American system of separated powers, and the historic struggle against judicial supremacy. Plaintiff intends that organization to be funded, in whole or in part, from proceeds recovered through civil-rights and constitutional-structural litigation, and to support the creation of a world-class constitutional museum in Florida dedicated to educating the public concerning the Jeffersonian and Madisonian foundations of American constitutional government. Plaintiff brings this action in his individual capacity and as a Republican congressional candidate and constitutional advocate whose political, reputational, ballot-access, and associational rights have been injured by Defendant Power's individual conduct and wrongful use of party authority.

B. Defendant Evan Power

27. Defendant Evan Power is an individual residing and working in Florida who currently serves as Chairman of the Republican Party of Florida and as a member of the Republican National Committee. Public election records further identify Power as a qualified Republican candidate for United States Representative, Florida Congressional District 2, in the 2026 election. Public lobbying records also identify Evan J. Power as a registered Florida lobbyist affiliated with Ramba Consulting Group LLC, a Tallahassee governmental consulting and government-relations firm. These overlapping roles are relevant because Power operates not merely as a private citizen, but as a political functionary, state and national party officer, candidate for federal office, lobbyist, and professional political actor whose public political authority and private non-political interests intersect and conflict.
28. Power is not sued as a proxy for Florida Republican voters, Republican Party members, county-level volunteers, precinct workers, delegates, donors, or the political beliefs of the Republican electorate. Plaintiff does not sue the Republican Party of Florida as a community of Republican voters, nor does Plaintiff seek relief against ordinary Republicans, party members, county committee members, volunteers, delegates, donors, or voters. The distinction is essential. This action concerns Evan Power's individual conduct, statements, decisions, and wrongful use of institutional party machinery, titles, authority, and influence for his personal benefit, not the rights, beliefs, or associational identity of Florida Republicans generally.

IV. FACTUAL ALLEGATIONS

A. The Selective Use of the Gainesville Coffee-Shop Story to Malign Plaintiff

29. Plaintiff alleges that Defendant Power, directly or through Republican Party channels, political contacts, media contacts, or allied actors, has used, repeated, encouraged, benefited from, or failed to correct a distorted narrative concerning a September 2022 Gainesville coffee-shop incident involving Plaintiff and George Alexander Diaz Menges.
30. The Gainesville Sun / USA Today Network, through reporter Andrew Caplan, published a story on or about September 21, 2022, concerning a confrontation at a Gainesville coffee shop. The story was framed publicly as an incident in which Plaintiff, a former Republican congressional candidate, threatened to “knock out” an employee. Plaintiff alleges that this framing was false, incomplete, and materially misleading because the individual involved was not merely an ordinary coffee-shop employee disconnected from Plaintiff’s political history, but a former campaign-related individual connected to the sabotage and disruption of Plaintiff’s prior Republican congressional campaign.
31. Plaintiff alleges that the coffee-shop confrontation was staged or provoked against him, that the confrontation occurred in the presence of a person filming Plaintiff, and that the resulting video and media framing were later used to portray Plaintiff as threatening, unstable, unqualified, or politically discredited. Plaintiff alleges that this portrayal omitted the material political context: Plaintiff’s prior campaign against Katherine Cammack, Plaintiff’s withdrawal from that race after alleging sabotage, Plaintiff’s later RICO action, Plaintiff’s challenge to Florida’s use of unexplained per curiam affirmances, and Plaintiff’s continuing constitutional and civil-rights advocacy.
32. Plaintiff further alleges that the omission became more serious after public reports later identified George Alexander Diaz Menges as having been arrested on serious charges including kidnapping, sexual assault, aggravated battery, and battery, with a reported recommended bond exceeding \$1.5 million. Plaintiff does not plead those criminal accusations as convictions. Plaintiff pleads them because the later-reported charges are material to the credibility, context, and political use of the coffee-shop narrative.
33. Plaintiff alleges that hostile political actors have selectively used the Gainesville coffee-shop story while omitting the campaign-related context, the alleged staging of the confrontation, the presence of filming, the prior sabotage allegations, the subsequent RICO and per curiam affirmation litigation, and the later serious criminal charges reported against Menges. Plaintiff alleges that this selective use created a false and defamatory impression that Plaintiff was merely irrational, threatening, or unfit for office, rather than a Republican candidate and constitutional advocate responding to a campaign-related provocation that formed part of a larger history of political sabotage, litigation, and judicial-accountability advocacy.

34. Plaintiff alleges that Defendant Power has used, repeated, ratified, benefited from, or failed to correct this distorted narrative in connection with Plaintiff's current 2026 Republican congressional candidacy in Florida's Sixth Congressional District. Plaintiff further alleges that the narrative has been directed to, repeated within, or foreseeably received by Republican voters, donors, activists, media contacts, party participants, and political audiences in St. Johns County and throughout Florida's Sixth Congressional District, thereby injuring Plaintiff's reputation, candidacy, political participation, ballot-related interests, and associational standing.

B. The June 21, 2024 Request for Hearing and the Origin of the Power Dispute

35. On or about June 21, 2024, Plaintiff Manuel P. Asensio and Robert A. Harris, as co-chairmen of the St. Johns Presidential Executive Committee, submitted a written request for hearing to the Republican Party of Florida concerning the internal handling of the Committee's charter application, the Committee's use of the www.stjohnsgop.org domain, conflicting Republican federal-judiciary policies, alleged improper bias toward United States Congresswoman Katherine Cammack, and issues subject to the rules and regulations of the Republican Party of Florida.
36. The June 21, 2024 request for hearing stated that the St. Johns Presidential Executive Committee was a Republican organization dedicated to reforming the GOP's federal judiciary policy. The request recognized the authority of the Republican State Executive Committee of Florida to regulate party matters and the use of party names, symbols, and logos, but sought a fair internal process for resolving the Committee's charter application and speech rights.
37. The June 21, 2024 request further stated that Plaintiff had taken the Oath of Party Loyalty, had qualified to run as a Republican, and was a candidate for Republican State Committeeman for St. Johns County. It also stated that Plaintiff had filed a complaint against the St. Johns County REC Chairman, that Katherine Cammack had paid the expense to sue Plaintiff to remove him from the ballot, that Cammack lost and lost again on appeal, and that Plaintiff was the plaintiff in a Florida RICO action against Cammack.
38. The June 21, 2024 request expressly alleged that lawyers for the Republican State Executive Committee had an irreparable conflict of interest because they represented Cammack. It further alleged that Defendant Evan Power had made false statements concerning the Asensio v. Cammack matter to others, including members of the Republican Executive Committee, and had made false statements about the Committee's application to use "GOP" in the domain www.stjohnsgop.org.

39. The June 21, 2024 request alleged that this conduct harmed President Donald J. Trump, the Republican Party of Florida, and the ability of Republicans to have a fair and honest internal debate concerning Republican federal judiciary policy. The request tied the dispute directly to Plaintiff's proposed policy concerning the Judicial Conduct Act, the Rules Enabling Act, the United States Judicial Conference, and what Plaintiff described as organized federal judicial corruption.
40. The June 21, 2024 request is relevant to this action because it shows that Plaintiff's dispute with Power did not begin with the 2026 congressional race. It began earlier, inside Republican Party processes, over Plaintiff's Republican speech, club-charter request, use of GOP identifiers, Cammack-related litigation, and federal judiciary policy. Plaintiff alleges that Power's current conduct continues the same pattern: using party authority, party mechanisms, and party credibility to suppress, distort, or punish Plaintiff's Republican constitutional advocacy.

C. The September 23, 2024 Supplement to the Request for Grievance Hearing

41. On or about September 23, 2024, the St. Johns Presidential Republican Executive Committee filed a supplement and first amendment to its June 21, 2024 Request for Grievance Hearing. The supplement concerned the Committee's charter application, the Republican Party of Florida's conflict with Plaintiff's presidential and congressional federal-judiciary policies, the RPOF's alleged improper bias in the matter of Manuel P. Asensio v. Katherine Cammack, and issues subject to RPOF rules, RNC policy, President Donald J. Trump's federal-judiciary policy, and the RNC's 2024 presidential campaign.
42. The September 23, 2024 supplement attached and relied upon WIPO Administrative Panel Procedural Order No. 1 in Republican Party of Florida v. Manuel Asensio, WIPO Case No. D2024-3099. That order required the Republican Party of Florida to provide proof that it had permission to assert federal trademark registrations owned by a third party that was not named in the proceeding. Plaintiff alleges that this order was significant because the GOP mark was owned by the Republican National Committee, while the Republican Party of Florida was using asserted GOP authority in a dispute against Plaintiff and St. Johns GOP.
43. The September 23, 2024 supplement alleged that the matter concerned the wrongful use of political raw will and force by Governor Ron DeSantis and Defendant Evan Power against St. Johns GOP and Plaintiff individually. It further alleged that the WIPO proceeding and related conduct constituted a strategic action against Republican political speech and expression by St. Johns GOP and Plaintiff.

44. The supplement alleged that the dispute was rooted in the favorable political relationship between DeSantis, Power, and United States Congresswoman Katherine Cammack, and in their political opposition to Plaintiff's effort to prepare Republican county executive committee leadership to join with St. Johns GOP and Plaintiff in presenting President Donald J. Trump with Plaintiff's federal-judiciary policy concerning the Judicial Conduct Act, the Rules Enabling Act, and the United States Judicial Conference.
45. The supplement expressly tied the dispute to Plaintiff's disagreement with DeSantis and Power over the legality, constitutionality, and practical effect of Florida's 1980 constitutional amendment concerning judicial accountability and the federal Judicial Conduct and Disability Act of October 15, 1980. Plaintiff alleged that both the Florida and federal judicial-accountability systems were intended to address judicial corruption, but had been rendered ineffective by judges, lawyers, and legal-political actors who preserved judicial self-protection.
46. The supplement further identified Leonard Leo, the Federalist Society, and Republican legal-policy actors as central to the political disagreement. Plaintiff alleged that Federalist Society-aligned Republican lawyers dominated Republican policy concerning the Judicial Conduct Act, the Rules Enabling Act, the weaponization of the judicial system against President Trump, and organized federal judicial corruption at the United States Judicial Conference.
47. The September 23, 2024 supplement is relevant to this action because it shows that Plaintiff's dispute with Defendant Power had matured before the WIPO final decision into a formal grievance concerning speech suppression, GOP-brand authority, RNC authorization, Cammack-related bias, federal-judiciary policy, and the alleged use of party machinery to obstruct Plaintiff's Republican political advocacy. Plaintiff alleges that Power's current conduct against Plaintiff's 2026 congressional candidacy continues the same course of conduct identified in the June 21, 2024 grievance and expanded in the September 23, 2024 supplement.

D. The WIPO Decision Confirmed That Plaintiff's GOP-Domain Use Was Political Advocacy and That the Larger Dispute Required a Fuller Forum

48. On or about October 8, 2024, the World Intellectual Property Organization issued its administrative panel decision in Republican Party of Florida v. Manuel Asensio, WIPO Case No. D2024-3099, concerning the domain name www.stjohnsgop.org. The complainant was the Republican Party of Florida, represented by Shutts & Bowen LLP. Plaintiff Manuel P. Asensio was the respondent.

49. The WIPO decision recognized that the Republican National Committee owned the GOP mark and that the Republican Party of Florida claimed a non-exclusive license to use the GOP mark in Florida. The decision also recognized that Plaintiff and another individual had created a Florida organization dedicated to reforming the Republican Party's federal judiciary policy and that Plaintiff used www.stjohnsgop.org to publish views concerning Republican federal judicial policy, alleged judicial corruption, and related matters.
50. The WIPO panel found that Plaintiff's website appeared to be noncommercial in nature and consisted primarily of criticism and text concerning Plaintiff's views. The panel further found that, from the beginning, Plaintiff's website had been a noncommercial vehicle through which Plaintiff promoted his views and criticism of certain Republican Party members and policies.
51. The WIPO panel denied the complaint. In doing so, the panel concluded that Plaintiff's use of the domain name in connection with a noncommercial website criticizing Republican Party policies relating to alleged federal judicial corruption was sufficient to defeat the Republican Party of Florida's claim under the UDRP's legitimate-interest element.
52. The WIPO decision is directly relevant to this action because it confirmed that Plaintiff's use of the GOP identifier was not treated as a bad-faith commercial impersonation scheme, but as Republican political advocacy, criticism, and speech concerning Republican federal judiciary policy. The decision did not decide whether Plaintiff's federal-judiciary policy views were correct or incorrect. Instead, it recognized that the parties' larger dispute exceeded the limited scope of a UDRP domain-name proceeding.
53. The WIPO panel stated that, given the parties' longstanding dispute and the many issues beyond the scope of the UDRP, the broader controversy belonged in another forum where discovery and cross-examination would be available and where the parties could raise their claims and contentions. Plaintiff alleges that this statement is significant because the real dispute is not a narrow domain-name dispute. It is a Republican political and institutional dispute over speech, party machinery, GOP identity, federal judiciary policy, the Judicial Conduct Act, the Rules Enabling Act, and the ability of Republican candidates and members to challenge Federalist Society-aligned legal policy within Republican Party structures.
54. Plaintiff alleges that Defendant Power's conduct must be understood against this background. Power and those aligned with him opposed Plaintiff's use of Republican and GOP identifiers not because Plaintiff was outside the Republican Party, but because

Plaintiff was using those identifiers to challenge the Republican legal establishment's federal-judiciary policy. Plaintiff alleges that Power's opposition to Plaintiff is tied to Plaintiff's position that judicial overreach cannot be corrected merely through Supreme Court appointments and confirmation politics, but requires confronting the administrative machinery of the federal judiciary, including the Judicial Conduct Act, the Rules Enabling Act, the United States Judicial Conference, the Administrative Office of the United States Courts, and related judicial-policy structures.

55. Plaintiff alleges that this argument belongs first inside Republican Party processes, including the Republican Executive Committee structures that control party machinery, party recognition, party access, and party-brand authority. Plaintiff further alleges that when Defendant Power uses false statements, party titles, institutional influence, or GOP-brand authority to suppress, distort, or punish Plaintiff's position, the dispute also becomes a proper subject for judicial relief against Power individually.

E. The Cammack Litigation, RICO Action, and Per Curiam Affirmance Issue

56. Plaintiff's claims in this action also arise from the misuse and misrepresentation of Plaintiff's formal grievance complaint and related litigation concerning Katherine Cammack, Kat for Congress, Justin Waters, and others. Plaintiff alleges that the grievance complaint and subsequent litigation were not collateral or personal grievances, but part of Plaintiff's continuing political, constitutional, and civil-rights advocacy arising from Plaintiff's Republican congressional campaign and the alleged sabotage, obstruction, and misrepresentation of that campaign.
57. Plaintiff alleges that the grievance complaint set forth serious charges concerning political misconduct, campaign interference, false attacks on Plaintiff's Republican status and qualifications, and the use of legal and political processes to protect Katherine Cammack and those aligned with her. Plaintiff further alleges that those matters became connected to Plaintiff's later RICO action and to Plaintiff's broader challenge to Florida's use of unexplained per curiam affirmances to prevent meaningful review of constitutional, civil-rights, and political-process claims.
58. Plaintiff alleges that hostile political actors have falsely reduced, distorted, or misrepresented these proceedings as a mere withdrawal from a congressional race, a failed candidacy, or an abandoned dispute. Plaintiff alleges that this framing is false and materially misleading because Plaintiff's withdrawal from the race was publicly tied to Plaintiff's claim that his campaign had been sabotaged, and Plaintiff thereafter pursued legal and constitutional challenges arising from that sabotage, the conduct of Cammack and others, and the treatment of Plaintiff's claims by the Florida courts.

59. Plaintiff alleges that the First District Court of Appeal's per curiam affirmance in *Asensio v. Cammack* and related parties is central to Plaintiff's constitutional position. Plaintiff alleges that unexplained per curiam affirmances allow Florida's intermediate appellate courts to dispose of cases without addressing facts, circumstances, reasoning, constitutional questions, civil-rights issues, political-process violations, or the legal basis for affirmance. Plaintiff further alleges that such unexplained affirmances can prevent access to the Florida Supreme Court and obstruct later federal constitutional review.
60. Plaintiff's advocacy seeks to rein in this practice and to require meaningful appellate reasoning when constitutional, civil-rights, political-process, or judicial-accountability issues are raised. Plaintiff alleges that Florida's appellate structure gives enormous practical power to intermediate appellate courts when they may affirm without explanation, thereby leaving litigants without a reasoned decision to challenge, without a meaningful path to the state's highest constitutional court, and without an adequate record for federal constitutional review.
61. Plaintiff alleges that Defendant Power is hostile to this policy position and has aligned himself against Plaintiff's effort to expose, challenge, and reform the political and judicial structures that protect unexplained affirmances, judicial self-protection, and the concealment of constitutional injury. Plaintiff alleges that Power's opposition is political, institutional, and personal because Plaintiff's advocacy threatens the legal-political structure that Power and allied Republican legal actors continue to protect.
62. Plaintiff alleges that Power, directly or through Republican Party channels, political contacts, media contacts, or allied actors, has used, repeated, encouraged, benefited from, or failed to correct misrepresentations concerning Plaintiff's grievance complaint, Cammack litigation, RICO action, and per curiam affirmance challenge. Plaintiff alleges that these misrepresentations have been used to malign Plaintiff's knowledge, authority, qualifications, legal seriousness, Republican standing, constitutional advocacy, and current candidacy for Congress.
63. Plaintiff alleges that these distortions have injured Plaintiff in his current 2026 Republican congressional campaign by presenting him to Republican voters, donors, activists, media figures, party participants, and political audiences as unqualified, discredited, or unserious, while omitting that Plaintiff's position arises from formal grievance proceedings, public litigation, a per curiam affirmance, and an ongoing constitutional challenge to judicial processes that Plaintiff contends deny meaningful review to Floridians.

F. Rule 8, Randy Fine, and Power's Use of Party Machinery in the 2026 Primary

64. Plaintiff is a qualified Republican candidate for United States Representative in Florida's Sixth Congressional District in the 2026 election. Randy Fine is the incumbent and a Republican primary opponent of Plaintiff in that district.
65. Plaintiff alleges that Defendant Power has used, permitted, encouraged, ratified, or benefited from Republican Party of Florida-branded authority, party titles, party machinery, political influence, and institutional credibility to favor Fine over Plaintiff.
66. Plaintiff alleges that Fine's campaign publicly presents Power's support in a manner connected to the Republican Party of Florida and that RPOF-branded communications and political materials have been used to praise Fine, promote his incumbency, protect his political reputation, or attack his opponents.
67. Plaintiff alleges that this conduct is not neutral party administration. It is the use of party machinery by an adverse political actor to favor a selected incumbent and to deny, burden, marginalize, or interfere with Plaintiff's equal access to Republican mechanisms as a qualified Republican congressional candidate.
68. RPOF Rule 8 governs endorsements, certifications, screenings, recommendations, and support by Republican Party organs and Republican Executive Committees in contested Republican primaries.
69. Plaintiff alleges that any state-party endorsement, recommendation, certification, screening, or support in a contested Republican primary must comply with RPOF Rule 8 and the party's governing procedures.
70. Plaintiff further alleges that county Republican Executive Committees do not possess general authority under Rule 8 to endorse or support one Republican candidate over another in a contested Republican primary for federal office, including a race for the United States House of Representatives.
71. Plaintiff alleges that Defendant Power's conduct, and his use or allowance of RPOF-branded authority in favor of Fine, has misled or tended to mislead Republican voters, donors, activists, media figures, and party participants into believing that Fine enjoys authorized party support or institutional party preference over Plaintiff.
72. Plaintiff alleges that Power has not provided Plaintiff with equal access to Republican county-level and congressional-district mechanisms and has not administered the party's rules in a neutral, fair, honest, or procedurally regular manner.

73. Plaintiff alleges that Power's favoritism toward Fine is especially harmful because Fine has drawn public controversy for inflammatory statements about Muslims, Palestinians, Gaza, starvation, and war-related civilian casualties. Plaintiff alleges that Power's support for Fine while marginalizing Plaintiff further injures Plaintiff's reputation, candidacy, and political standing among Republican voters and public audiences.
74. Plaintiff alleges that Power's conduct, taken together with his earlier false statements about the Asensio v. Cammack matter and the GOP domain application, shows a continuing pattern of using party power to suppress, distort, or punish Plaintiff's Republican political advocacy.
75. Plaintiff alleges that Power's conduct has damaged Plaintiff's campaign, reputation, voter access, donor access, media access, party access, ballot-related interests, and associational standing in St. Johns County and throughout Florida's Sixth Congressional District.

G. Post-Filing Sabotage, Suppression of the District 6 Debate, Sharon Demers, County Chairs, and Power's Protection of Randy Fine

76. After filing the initial Complaint, Plaintiff served and circulated a June 24, 2026 letter to Sharon Demers, Chairwoman of the Republican Party of Florida Congressional Caucus for District 6. The letter demanded that the real constitutional issue in the race for Congress in Florida's Sixth Congressional District be made public before Republican voters.
77. The June 24, 2026 letter was directed to the Republican Party communications structure inside Florida's Sixth Congressional District, including the Republican county chairmen and chairwomen, and Republican Executive Committee leadership connected to Lake, Volusia, Flagler, Putnam, St. Johns, and Marion Counties.
78. Plaintiff's purpose was to place before District 6 Republican leadership the constitutional information Power and Fine refuse to debate: Republican Federalism, the Judicial Conduct Act, the Rules Enabling Act, the United States Judicial Conference, Roberts's control of federal judicial machinery, and the manner in which Plaintiff's constitutional information was taken from him, separated from him as source and author, and delivered into Trump's legal-political orbit without attribution and without Plaintiff's intended use.
79. Plaintiff stated in the June 24 letter that Power and Fine have refused to debate Republican Federalism because an honest debate would expose that President Trump used the Judicial Conduct Act only after Plaintiff's constitutional information was taken

from Plaintiff, separated from Plaintiff as its source and author, and delivered upward without showing Trump how Plaintiff intended the Act to be used.

80. Plaintiff further stated that Trump became the first president to use the Judicial Conduct Act in this way only after Plaintiff's information had been taken from him and given upward, and that Trump's inner legal circle will not tell Trump that the information came from Plaintiff or allow Trump direct access to Plaintiff.
81. The June 24 letter memorialized the timeline Plaintiff sought to place before Demers and the District 6 county chairs. That timeline included Pastor Stephen Broden's Texas platform fight, Mark Meadows's knowledge of Plaintiff's Republican Federalism work in 2020, the 2021 formation and work of America First Legal Foundation, Susie Wiles's taking of Plaintiff's constitutional information in 2022, Daniel Epstein's role in AFL's Roberts litigation, and the refusal by Boris Epshteyn and David Warrington to press the deeper Federalism and Judicial Conduct Act issues.
82. Plaintiff stated in the June 24 letter that Meadows and Wiles took Plaintiff's information from him, that the information was then used in the formation and legal work of AFL, and that it was later misused in the lawsuit against Roberts. Plaintiff further stated that Warrington and Epshteyn refused to take the matter to a deeper constitutional level.
83. Plaintiff also reminded Demers that Power personally organized the Republican Party of Florida attack on Plaintiff's campaign against Republican Federalism. Power filed a legal complaint based on a federal trademark the RPOF did not own. Power had no standing to sue Plaintiff. To get around that problem, Power called on the Republican National Committee's general counsel, John R. Hammond III, to join the RPOF's action against Plaintiff. Over Plaintiff's objections, Hammond agreed. Plaintiff nonetheless won.
84. Plaintiff stated in the June 24 letter that he won by proving that the RNC and RPOF were allowing the Republican Party's constitutional policy to be dictated by the Federalist Society and were concealing this from Republican voters. Plaintiff further stated that no Republican race in the nation had forced a public debate on the RNC's and RPOF's concealed federalist ideology or their adoption of the Federalist Society's constitutional policy without objection.
85. Plaintiff's June 24 letter placed Demers and the District 6 Republican communications structure on notice that Federalism is the force Power is concealing and protecting.
86. Plaintiff also prepared an Agenda for Discussion with Sharon Demers and Florida CD 6 county chairs. The agenda was not campaign rhetoric. It was a structured constitutional presentation designed for Republican leadership in District 6.

87. The agenda identified Movement One as the creation of the judiciary structural problem. That movement traced the problem from the Articles of Confederation, Mount Vernon, Annapolis, the Philadelphia Convention, the creation of federal judges, the failure to create meaningful controls over federal judges, state objections, ratification issues, the Judiciary Act of 1789, the Bill of Rights, Hayburn's Case, Marbury, the Samuel Chase impeachment, the Burr-related proceedings, Taft's Judicial Conference, the Rules Enabling Act, and the Judicial Conduct Act.
88. The agenda identified Movement Two as the destruction of Federalism and the rise of judicial supremacy. That movement stated that Federalism and judicial supremacy are the same thing, that the Federalist Party was politically defeated in 1800 by its own leader Alexander Hamilton, and that Marshall's theory of judicial supremacy was attacked in the Jefferson, Madison, Adams, Clay, and Jackson constitutional struggle.
89. The agenda then set out the Roberts Nine-Point Real History, including Roberts before becoming Roberts, Roberts and the Judicial Conference, Roberts and the Rules Enabling Act, Roberts and the Judicial Conduct Act, Plaintiff's June 25, 2021 consideration, Dobbs, Alito, and Roe v. Wade, Plaintiff's December 31, 2025 consideration, Roberts's conversion of restraint statutes, and why the issue belongs before District 6 Republican leadership.
90. The agenda expressly stated that the issue belongs before District 6 Republican leadership because the district's congressional representative must understand and act on this structure. The agenda further stated that the issue is not whether leaders agree with every sentence, but whether Republican leadership will examine the evidence, whether the caucus will meet or refuse to meet, and whether District 6 Republican leadership stands with Republican constitutional and anti-Federalist constitutional legal doctrines or with Federalist judicial supremacy.
91. Power's conduct directly interferes with this process. Plaintiff was not merely seeking a campaign platform or an ordinary candidate forum. Plaintiff was seeking to present a structured constitutional record to Demers and to the Republican county chairmen and Republican Executive Committee leadership in District 6. Power's use of party authority, his public support for Randy Fine, his control and influence within RPOF structures, and his false statements about Plaintiff operate to block that debate before it reaches Republican voters.
92. Demers is not named as a defendant in this action. Her relevance is structural. As Chairwoman of the Republican Party of Florida Congressional Caucus for District 6, she occupies a communications and coordination position connecting District 6 Republican

county chairman and chairwomen, Republican Executive Committee leadership, party officers, and Republican voters. Power's conduct is material because he uses his superior party position, party influence, and relationship with Fine to distort, suppress, or obstruct the debate Plaintiff is demanding through that District 6 structure.

93. Power's relationship with Fine is central to the sabotage. Power publicly supports and protects Fine while serving as RPOF Chairman, RNC member, Leon County Republican official, candidate for Congress in Florida's Second Congressional District, lobbyist, and political operative. Power is not acting as a neutral administrator. He is acting as a conflicted political actor using party position and influence to protect Fine and suppress Plaintiff's constitutional message.
94. Power's conduct injures Plaintiff because the majority of Republican voters in District 6 are MAGA voters who are entitled to hear Plaintiff's constitutional information before the primary. Plaintiff's information concerns Trump, the Judicial Conduct Act, Roberts, the federal judiciary, Republican Federalism, the Federalist Society, and the sabotage of Trump's legal path. Power's conduct keeps that information from reaching the voters and party leaders who need it.
95. Plaintiff's June 30, 2026 report concerning Trump lawyer sabotage further confirms the relationship between the Roberts issue, the Trump legal-political gatekeepers, and *Asensio v. Power*. The report states that Trump's lawyers sabotaged the Roberts case, that Plaintiff preserved Trump's legal path, and that political power is now required to break the Roberts-loyal gatekeepers, get the truth to Trump, and reverse the loss.
96. The June 30 report also states that *Asensio v. Evan Power* is part of the same political-legal fight, and that the Republican Party machinery protecting Randy Fine is not separate from the Roberts issue. It is part of the same Roberts-loyal, Federalist Society-controlled political structure blocking Plaintiff from reaching Trump and reversing the loss.
97. Power's conduct after the initial Complaint confirms and expands the injuries pleaded in this action. Power is not merely making personal political statements. He is using party position, party influence, and party machinery to sabotage Plaintiff's campaign, protect Fine, prevent District 6 Republican leaders from receiving Plaintiff's constitutional information, and keep Republican voters from hearing the debate Plaintiff is uniquely qualified to bring. Plaintiff's injuries therefore include not only the injuries previously pleaded, but also injury to Plaintiff's post-filing effort to present his constitutional information to Sharon Demers, the District 6 county chairs, Republican Executive Committee leadership, Republican voters, MAGA voters, donors, media contacts, and

party participants. Power's conduct injures Plaintiff's access to the very Republican political channels necessary to expose the constitutional-information and the Trump-lawyer sabotage.

H. Power's First Year as RPOF Chairman and the 2024 Obstruction of Plaintiff's Trump/Judicial Conduct Act Strategy

98. Plaintiff alleges that Defendant Power became Chairman of the Republican Party of Florida in January 2024. Before becoming RPOF Chairman, Power served for years as Chairman of the Leon County Republican Party and then as Vice Chairman of the Republican Party of Florida. His first year as RPOF Chairman therefore coincided with Plaintiff's sustained 2024 effort to organize Republican county and congressional-district leaders to reach President Donald J. Trump directly concerning the Judicial Conduct Act of 1980, the United States Judicial Conference, Roberts's control of federal judicial machinery, and the legal-political actions being used against Trump during the 2024 presidential campaign.
99. Plaintiff alleges that beginning no later than February and March 2024, Plaintiff and St. Johns GOP repeatedly placed Power, RPOF officials, and Republican Executive Committee officials on written notice that Plaintiff was attempting to organize Republican officials outside congressional incumbents, outside party consultants, and outside the Republican legal establishment to present Trump with a Judicial Conduct Act Consideration strategy.
100. On March 7, 2024, Plaintiff notified Republican officials in Florida's Sixth Congressional District that he had been engaged for months in conversations with REC county chairs and officials about jointly calling for a meeting with Trump to discuss how federal judges were using judicial-branch executive agencies against the MAGA political movement and how Trump could use the Judicial Conduct Act to bring constitutional order to his legal issues and prevent the same judicial interference that had affected his first term. The March 7 communication stated that Plaintiff had "all the evidence law and arguments Trump needs."
101. On March 15, 2024, Plaintiff sent Power the first report to the RPOF Chairman concerning RPOF federal-judiciary policy. The report stated that an RPOF campaign to inaugurate an anti-organized federal judicial corruption policy would end the power of judges to use raw will and force against the Constitution, and that Republicans could only win through honest processes, open inquiry, shared information, and constructive disagreement.

102. On April 9, 2024, Plaintiff again wrote Power and stated that REC officials had a right to participate in setting the Party's federal judiciary conduct policy independently of institutional GOP forces that had destroyed the rule of law and harmed MAGA Republicans' credibility, and Trump's efforts to retake the White House. Plaintiff also stated that he had provided evidence concerning Roberts and the United States Judicial Conference.
103. On April 27, 2024, Plaintiff sent Power and a broad RPOF and REC distribution list the final draft of "Trump Must File a Consideration Now." Plaintiff stated that the final draft contained REC input and set the foundation for the Consideration.
104. On May 16, 2024, Plaintiff sent Power the publication version of "Trump Must File a Consideration Now." Plaintiff stated that it represented three months of continuous work by REC members and conservative Republican lawyers who did not know about the Judicial Conduct Act or how it was being administered against MAGA political movement's credibility.
105. On September 18, 2024, Plaintiff wrote Power that he had started the conversation with Power and the REC on February 23, 2024, that it was time to act, and that Trump needed the information being kept from him before the 2024 election. Plaintiff stated that a small group of conflicted lawyers had left Trump without an offense in a nationally televised debate and that Trump needed Florida Republicans to break through and show him the information being withheld from him.
106. On October 10, 2024, Power was copied on notice that RNC General Counsel John Hammond had not obtained RNC Executive Committee approval before joining the RPOF and DeSantis-side action against St. Johns GOP's policies toward organized federal judicial corruption at the Judicial Conference and Roberts's sanctioning of that corruption as presiding officer.
107. On October 22, 2024, Power was again copied on a letter stating that St. Johns GOP was closer than expected to meeting Trump on Roberts and the U.S. Judicial Conference, but that Power's failure to act had helped prevent that meeting before the presidential debate. The letter stated that Power was serving the interests of Leonard Leo and the Federalist Society.
108. Plaintiff alleges that these 2024 notices show that Power had direct notice of Plaintiff's Trump/Judicial Conduct Act strategy during Power's first year as RPOF Chairman. Power was not dealing with a mystery, a personal grievance, or a mere campaign slogan. Power was placed on written notice that Plaintiff was attempting to bring Trump a specific constitutional, statutory, and political strategy concerning the

Judicial Conduct Act, the Judicial Conference, Roberts, the 2020 election aftermath, and the legal actions being used against Trump in 2024.

109. Plaintiff alleges that Power obstructed, ignored, burdened, or refused to support that effort, while allowing Republican legal-political actors and party machinery to continue controlling the route by which Trump received, or did not receive, Plaintiff's Judicial Conduct Act information.

I. The June 27, 2026 Sunshine State Showdown, Plaintiff's Exclusion, and Power's July 7, 2026 Debate Statement

110. Plaintiff alleges that on or about June 27, 2026, the Republican Party of Florida held or promoted a Republican political event known as the Sunshine State Showdown. Plaintiff alleges that the event was an RPOF-branded or RPOF-controlled political platform designed to promote Republican candidates, issues, party identity, media attention, donor attention, and voter attention.
111. Plaintiff alleges that he was not provided equal access to participate in, speak at, be recognized at, or otherwise present his candidacy and constitutional policy at the Sunshine State Showdown, despite being a qualified Republican candidate for United States Representative in Florida's Sixth Congressional District and despite the centrality of his Judicial Conduct Act, Roberts, and Trump-lawyer sabotage issues to Republican and GOP MAGA voters.
112. Plaintiff alleges that the denial, burdening, or obstruction of his access to the Sunshine State Showdown continued the same course of conduct already pleaded in this action: Power's use or allowance of party machinery, party credibility, party access, party communications, and institutional influence to marginalize Plaintiff and protect preferred Republican candidates and preferred Republican legal-policy positions.
113. Plaintiff alleges that Power's conduct concerning the Sunshine State Showdown injured Plaintiff because Republican voters, donors, media figures, activists, party officers, and political participants were denied a fair opportunity to hear Plaintiff's position on the Judicial Conduct Act, Roberts's control of the Judicial Conference, the Trump-lawyer sabotage issue, the 2020 presidential election aftermath, and the legal-political actions against MAGA and Trump.
114. On July 7, 2026, the Republican Party of Florida issued a public statement concerning debates. The statement declared that RPOF had not sanctioned or agreed to debates in statewide races, that any discussions concerned post-primary negotiations with nominees, campaigns, and the opposing party, and that outside

political interest groups and media outlets could not “hijack” the debate process or unilaterally dictate terms to candidates.

115. In that July 7, 2026 statement, Power stated that RPOF looked forward to “substantive and thought-provoking debates” that would “clearly highlight the stark differences” between Republican candidates and Democratic candidates after the August primary. Power further stated that Floridians “deserve to hear” opposing candidates defend their agenda on the debate stage and that RPOF remained committed to ensuring voters had “every opportunity to see the clear choice before them” *in November*.
116. Plaintiff alleges that Power’s July 7, 2026 statement is relevant because Power expressly recognized the importance of debate access, candidate contrast, voter information, and party-controlled or party-sanctioned public comparison of candidates.
117. Plaintiff alleges that Republican *primary voters deserve no less*. Power cannot claim that Floridians deserve substantive debates, candidate comparison, and a clear choice after the primary while using, permitting, encouraging, or benefiting from RPOF authority, silence, exclusion, and institutional influence to deny Republican primary voters a fair opportunity to hear the substantive differences among Republican candidates before the primary.
118. Plaintiff alleges that the Republican primary in Florida’s Sixth Congressional District includes issues of national Republican importance: the Judicial Conduct Act, the Rules Enabling Act, Roberts’s control of the Judicial Conference, the legal actions against MAGA and Trump, the 2020 election aftermath, the Federalist Society’s influence over Republican judicial policy, and the Trump-lawyer sabotage issue. Power’s refusal to allow or support a fair Republican process for those issues contradicts Power’s own stated debate principle.
119. Plaintiff alleges that Power’s July 7, 2026 statement proves Power understands that debate sanctioning, candidate recognition, party event access, media access, and voter comparison are instruments of political power. Plaintiff alleges that Power has used or permitted those instruments selectively against Plaintiff.

J. Selective Party Power: Power's Harsh Treatment of Plaintiff While Remaining Silent Toward Dan Bilzerian's Public Record

120. Plaintiff alleges that Power's treatment of Plaintiff is made more revealing by Power's silence, inaction, or lack of comparable party response toward Dan Bilzerian, a Republican candidate or Republican ballot figure whose public record has drawn significant controversy.
121. Plaintiff does not plead the public allegations concerning Bilzerian to make Bilzerian a defendant or to seek relief against Bilzerian. Plaintiff pleads them because Power's treatment of Bilzerian is relevant to Power's selective use of party authority, party standards, party access, and party discipline.
122. Public reporting concerning Bilzerian includes a lawsuit by adult performer Janice Griffith arising from a 2014 incident in which she alleged that Bilzerian threw her from the roof of a home toward a swimming pool during a Hustler-related shoot, that she missed the pool, struck the edge, and broke her foot.
123. Public reporting concerning Bilzerian's response to Griffith includes that Bilzerian's lawyer blamed Griffith for allegedly grabbing Bilzerian's shirt, called her a "crass opportunist," threatened sanctions, and mocked her claim rather than responding with apology or responsibility.
124. Public reporting also includes a lawsuit by Vanessa Castano alleging that Bilzerian kicked her in the face at a Miami Beach nightclub while wearing military-style boots or boots resembling military boots. Plaintiff does not plead those civil allegations as adjudicated criminal convictions. Plaintiff pleads them as part of the public record that has surrounded Bilzerian.
125. Public reporting also links Bilzerian to antisemitic, anti-Israel, anti-Republican, anti-MAGA, or extremist political controversy, as well as to Ignite International Brands, a public-company venture built around the Bilzerian brand that later became the subject of federal securities-related proceedings concerning Paul Bilzerian and Ignite. Plaintiff does not allege that Dan Bilzerian was charged in that federal matter. Plaintiff pleads the public record because it bears on Power's selective party response.
126. Plaintiff alleges that Power has shown no comparable urgency, public party discipline, access restriction, or institutional hostility toward Bilzerian, despite Bilzerian's far more publicly scandalous record, while Power has used or permitted party machinery to malign, marginalize, burden, and obstruct Plaintiff, a qualified Republican candidate whose record concerns formal constitutional advocacy,

Republican federal-judiciary policy, WIPO-vindicated GOP-domain speech, and his long-term expert investigations into the administration of the Judicial Conduct Act.

127. Plaintiff alleges that this contrast shows selective party power. Power is not policing Republican standards neutrally. Power has treated Plaintiff's Judicial Conduct Act advocacy, Roberts challenge, and Republican Federalism position as threats to be suppressed, while allowing other Republican scandal, vulgarity, or public controversy to exist without comparable party response when it does not threaten the Roberts/Federalist Society-aligned legal-political structure Plaintiff seeks to expose.

128. Plaintiff alleges that the Bilzerian contrast further supports Plaintiff's claim that Power's conduct is not neutral party administration, but adverse factional conduct directed at Plaintiff, Plaintiff's candidacy, Plaintiff's constitutional message, and Plaintiff's effort to force a Republican debate concerning Trump, Roberts, the Judicial Conduct Act, and the Federalist Society's control over Republican judicial policy.

V. COUNTS

COUNT I: Declaratory Relief

129. Plaintiff realleges paragraphs 1 through 128 as if fully set forth herein.

130. An actual, present, and practical controversy exists between Plaintiff and Defendant Power.

131. Plaintiff contends that Power has misused, manipulated, exceeded, or circumvented Republican Party titles, machinery, authority, endorsement procedures, and institutional influence to favor Randy Fine over Plaintiff and to burden Plaintiff's rights as a qualified Republican congressional candidate.

132. Plaintiff contends that Power has acted as an adverse political actor, not as a neutral party administrator, and has used or permitted the use of party machinery and RPOF-branded credibility in a manner that violates Plaintiff's rights and exceeds or circumvents party rules, including Rule 8.

133. Plaintiff contends that Power's conduct has harmed Plaintiff's candidacy, reputation, political participation, ballot-related interests, and associational standing.

134. Plaintiff is in doubt concerning his rights, status, privileges, and legal relations with respect to Defendant Power's use of Republican Party authority, RPOF-branded

endorsement activity, Rule 8, access to party mechanisms, and Power's individual conduct.

135. Plaintiff requests a declaration that Defendant Power may not use, permit, encourage, or benefit from RPOF-branded authority, party machinery, endorsement signals, or institutional influence to favor one Republican candidate over Plaintiff in a contested Republican congressional primary without compliance with governing party rules and procedures.

136. Plaintiff further requests a declaration that Defendant Power's false statements, misuse of party authority, and denial or burdening of Plaintiff's equal access to Republican mechanisms violate Plaintiff's rights and exceed Power's authority as an individual political actor.

WHEREFORE, Plaintiff requests declaratory judgment in his favor and against Defendant Power, together with costs and such further relief as the Court deems just and proper.

COUNT II: Defamation and Defamation by Implication

137. Plaintiff realleges paragraphs 1 through 128 as if fully set forth herein.

138. Defendant Power made, repeated, encouraged, ratified, benefited from, or failed to correct false statements and defamatory implications concerning Plaintiff.

139. The defamatory statements and implications concerned Plaintiff personally and professionally, including Plaintiff's honesty, integrity, Republican loyalty, litigation history, constitutional advocacy, mental and moral fitness, qualifications for office, and trustworthiness as a Republican candidate and citizen advocate.

140. The false and defamatory matter included, without limitation, statements and implications concerning: (a) the Asensio v. Cammack matter; (b) Plaintiff's GOP-domain application and use of www.stjohnsgop.org; (c) Plaintiff's Republican standing and right to use Republican and GOP identifiers; (d) Plaintiff's withdrawal from a prior congressional race after alleging sabotage; (e) Plaintiff's Cammack-related litigation and RICO claims; (f) Plaintiff's per curiam affirmance challenge; (g) the Gainesville coffee-shop incident; and (h) Plaintiff's current candidacy for Congress in Florida's Sixth Congressional District.

141. The June 21, 2024 Request for Hearing expressly alleged that Defendant Power made false statements concerning the Asensio v. Cammack matter to others, including members of the Republican Executive Committee, and made false statements about the St. Johns Presidential Executive Committee's application to use "GOP" in the domain www.stjohnsgop.org.

142. Plaintiff alleges that the statements and implications were false because Plaintiff was and is a Republican voter, Republican Party member, qualified Republican candidate, constitutional advocate, and co-chairman of a Republican organization whose GOP-domain advocacy was later sustained in the WIPO proceeding. Plaintiff further alleges that the Asensio v. Cammack matter, the GOP-domain dispute, the WIPO proceeding, and the St. Johns GOP grievance filings show that Plaintiff's conduct was not dishonest, fake, unstable, non-Republican, or discredited, but part of a continuing course of Republican constitutional advocacy.
143. Plaintiff alleges that Defendant Power created defamatory implications by omitting material facts, selectively presenting events, and juxtaposing incomplete facts in a manner that falsely portrayed Plaintiff as dishonest, unstable, discredited, unserious, unfit for office, or unworthy of trust. These omissions included the June 21, 2024 Request for Hearing, the September 23, 2024 supplement, the WIPO Procedural Order, the October 8, 2024 WIPO decision, the political context of the Cammack dispute, the campaign-sabotage allegations, the per curiam affirmance issue, and the later serious criminal charges reported against George Alexander Diaz Menges.
144. Plaintiff alleges that Defendant Power's statements and implications were published to third parties, including members of the Republican Executive Committee, Republican Party officers, Republican activists, donors, media contacts, party participants, political operatives, and Republican voters in St. Johns County and throughout Florida's Sixth Congressional District.
145. Plaintiff alleges that Defendant Power acted knowingly, recklessly, and with actual malice because Power knew or had reason to know of the June 21, 2024 Request for Hearing, the September 23, 2024 supplement, the WIPO proceedings, the WIPO decision, Plaintiff's Republican status, Plaintiff's candidacy, and the falsity or misleading nature of the statements and implications used against Plaintiff.
146. Plaintiff alleges that the defamatory statements and implications prejudiced Plaintiff in the eyes of a substantial and respectable community of Republican voters, Republican Party members, donors, activists, media figures, political participants, and citizens who value honesty, constitutional fidelity, courage, seriousness, and trustworthiness in public life.
147. Plaintiff alleges that the defamatory statements and implications injured Plaintiff personally by attacking his integrity, honor, truthfulness, credibility, moral standing, and reputation for constitutional seriousness. Plaintiff further alleges that

the statements and implications injured Plaintiff politically by damaging his candidacy, voter access, donor access, media access, party access, ballot-related interests, and associational standing.

148. Plaintiff alleges that he suffered actual damages, presumed damages to the extent permitted by law, special damages, consequential damages, emotional and reputational injury, campaign injury, loss of political opportunity, loss of donor access, loss of media access, loss of party access, and harm to his ability to present himself truthfully to Republican voters.

WHEREFORE, Plaintiff demands judgment against Defendant Power for compensatory damages, special damages, consequential damages, punitive damages to the extent permitted by law, costs, and such other relief as the Court deems just and proper.

COUNT III: Injurious Falsehood and Personal Reputational Harm

149. Plaintiff realleges paragraphs 1 through 128 as if fully set forth herein.

150. Defendant Power made, repeated, encouraged, ratified, benefited from, or failed to correct false, misleading, and materially incomplete statements concerning Plaintiff's personal integrity, honor, credibility, Republican loyalty, constitutional advocacy, litigation history, and fitness to serve as a Republican candidate for Congress.

151. Plaintiff alleges that Defendant Power's conduct was not merely political disagreement or opinion. It included false or materially misleading factual assertions and implications capable of being proven true or false, including assertions and implications concerning the Asensio v. Cammack matter, the GOP-domain application, Plaintiff's Republican standing, Plaintiff's litigation history, Plaintiff's campaign history, and Plaintiff's constitutional advocacy.

152. Plaintiff alleges that Defendant Power's conduct injured Plaintiff's personal honor and integrity by falsely suggesting that Plaintiff was dishonest, unstable, discredited, untrustworthy, non-Republican, unserious, or unfit to participate in Republican political life.

153. Plaintiff alleges that these falsehoods and misleading implications struck at the core of Plaintiff's identity and reputation. Plaintiff's advocacy concerning judicial corruption, per curiam affirmances, the Judicial Conduct Act, the Rules Enabling Act, the United States Judicial Conference, Republican federal-judiciary policy, and GOP-

domain speech arises from Plaintiff's personal convictions, political identity, and moral commitment to truth and constitutional accountability.

154. Plaintiff alleges that Defendant Power knew or should have known that these statements and implications were false or materially misleading, and that Defendant Power acted knowingly, recklessly, maliciously, in bad faith, or for improper personal, factional, political, or conflicted purposes.

155. Plaintiff alleges that Defendant Power's conduct caused personal reputational injury, humiliation, loss of trust, loss of credibility, campaign injury, donor injury, media injury, party-access injury, voter-access injury, and injury to Plaintiff's ability to defend his name, honor, integrity, and constitutional advocacy before Republican voters and the public.

WHEREFORE, Plaintiff demands judgment against Defendant Power for damages, costs, and such other relief as the Court deems just and proper.

COUNT IV: Tortious Interference with Advantageous Political, Campaign, Donor, Media, and Associational Relationships

156. Plaintiff realleges paragraphs 1 through 128 as if fully set forth herein.

157. Plaintiff has existing and prospective advantageous relationships with Republican voters, donors, supporters, activists, media figures, county-level political actors, campaign volunteers, and party participants in St. Johns County and throughout Florida's Sixth Congressional District.

158. Defendant Power knew or should have known of these relationships because Plaintiff is a qualified Republican candidate for Congress in Florida's Sixth Congressional District and because Power serves as Chairman of the Republican Party of Florida.

159. Plaintiff alleges that Defendant Power intentionally and unjustifiably interfered with these relationships by using, permitting, encouraging, or benefiting from Republican Party titles, machinery, endorsement signals, institutional authority, and false or misleading statements to favor Randy Fine, marginalize Plaintiff, and injure Plaintiff's reputation and access.

160. Plaintiff alleges that Defendant Power's interference was not privileged because Power acted as an adverse political actor and individual, not as a neutral party administrator, and because he used false statements, misleading implications, improper favoritism, and misuse of party authority.

161. Plaintiff alleges that Defendant Power's interference damaged Plaintiff's campaign, reputation, donor access, media access, voter access, party access, ballot-related interests, and associational standing.

WHEREFORE, Plaintiff demands judgment against Defendant Power for damages, costs, and such other relief as the Court deems just and proper.

COUNT V: Wrongful Misuse of Party Authority, Party-Controlled Resources, and Unequal Access to Party Mechanisms

151. Plaintiff realleges paragraphs 1 through 128 as if fully set forth herein.
152. Plaintiff is a qualified Republican candidate for Congress and a Republican Party member with a legally protected interest in fair, honest, non-misleading, and procedurally regular access to Republican political mechanisms affecting his candidacy.
153. Defendant Power holds and uses party titles, institutional influence, party-controlled resources, party machinery, endorsement mechanisms, communication channels, political access, party credibility, and institutional authority that affect Plaintiff's access to Republican voters, donors, activists, media, county-level mechanisms, congressional-district mechanisms, and party participants.
154. Plaintiff alleges that Defendant Power wrongfully used, manipulated, or circumvented party authority, party-controlled resources, party machinery, endorsement mechanisms, communication channels, political access, party credibility, and institutional influence to burden Plaintiff and favor Randy Fine.
155. Plaintiff alleges that Defendant Power's conduct included the use or allowance of RPOF-branded endorsement activity, political signals, party influence, institutional credibility, party-controlled access, and party-controlled resources without fair treatment of Plaintiff and without compliance with governing party rules and procedures, including RPOF Rule 8.
156. Plaintiff alleges that Defendant Power's conduct was wrongful, misleading, unfair, and injurious because it converted party authority, party-controlled resources, party credibility, and Republican institutional goodwill into a personal, factional, or conflicted weapon against Plaintiff's candidacy and political advocacy.
157. Plaintiff alleges that Defendant Power used or permitted the use of party authority, party-controlled resources, party titles, party credibility, endorsement signals, and Republican institutional goodwill for personal gain, factional gain, political advantage, candidate protection, or conflicted purposes, including the protection and promotion of Randy Fine and the marginalization of Plaintiff.

158. Plaintiff alleges that Defendant Power denied, burdened, or obstructed Plaintiff's equal access to party mechanisms, party-controlled resources, party credibility, political access, communication channels, and Republican institutional goodwill while allowing those same mechanisms, resources, and signals to be used for the benefit of Fine.

159. Plaintiff alleges that Defendant Power's conduct injured Plaintiff's rights, reputation, candidacy, political participation, ballot-related interests, access to Republican voters, access to donors, access to media, access to party participants, and associational standing.

WHEREFORE, Plaintiff demands judgment against Defendant Power for damages, declaratory relief, injunctive relief, costs, and such other relief as the Court deems just and proper.

COUNT VI: Post-Filing Tortious Interference, Sabotage of District 6 Republican Communications, and Continuing Misuse of Party Machinery

160. Plaintiff realleges paragraphs 1 through 128 as if fully set forth herein.

161. After the filing of the initial Complaint, Plaintiff undertook a specific effort to place his constitutional information, Republican Federalism position, Judicial Conduct Act position, and Roberts-related record before Sharon Demers, the Republican Party of Florida Congressional Caucus for District 6, the Republican county chairmen and chairwomen, Republican Executive Committee leadership, MAGA voters, donors, media contacts, party participants, and Republican voters in Florida's Sixth Congressional District.

162. Plaintiff's post-filing effort was not an ordinary campaign communication. It was a structured effort to present Republican leadership with evidence concerning Plaintiff's constitutional-information taking, the misuse of that information in Trump's legal-political orbit, the sabotage of Trump's legal path against Roberts and the federal judiciary, the role of Republican Federalism, and the need for District 6 Republican voters to hear and debate those issues before the 2026 Republican primary.

163. Plaintiff had existing and prospective advantageous political, campaign, donor, media, associational, and party-access relationships with Sharon Demers, the District 6 Republican county chairmen and chairwomen, Republican Executive Committee officers and members, MAGA voters, donors, media contacts, campaign

supporters, party participants, and Republican voters in Lake, Volusia, Flagler, Putnam, St. Johns, and Marion Counties.

164. Defendant Power knew or should have known of these relationships and prospective relationships because Plaintiff is a qualified Republican candidate for Congress in Florida's Sixth Congressional District, because Power is Chairman of the Republican Party of Florida, because Power publicly supports Randy Fine, because Power has already acted adversely to Plaintiff concerning Republican Federalism and GOP-brand advocacy, and because the District 6 Republican political structure is central to the contested Republican primary between Plaintiff and Fine.
165. Defendant Power intentionally, unjustifiably, and wrongfully interfered with Plaintiff's post-filing effort to present his constitutional information and campaign message to District 6 Republican leadership and voters by using party position, party influence, party machinery, endorsement signals, political pressure, false statements, misleading implications, and his relationship with Fine to suppress, distort, obstruct, or sabotage Plaintiff's access to those audiences.
166. Defendant Power's interference was not privileged, neutral, administrative, or protected party management. Power acted as an adverse political actor and conflicted individual. He was protecting Fine, protecting the party bureaucracy, protecting the concealed Federalist Society-controlled legal policy Plaintiff seeks to expose, and protecting his own political interests as RPOF Chairman, RNC member, Leon County Republican official, congressional candidate in Florida's Second Congressional District, registered lobbyist, and professional political operative.
167. Defendant Power's post-filing conduct continued the same course of conduct pleaded throughout this Amended Complaint. Power's conduct began with false statements concerning the Asensio v. Cammack matter and Plaintiff's GOP-domain advocacy, continued through the RPOF/RNC attack on Plaintiff's Republican Federalism campaign, continued through Power's use of party machinery and endorsement signals to favor Fine, and expanded after filing into interference with Plaintiff's effort to bring the District 6 constitutional debate to Sharon Demers, the county chairmen and chairwomen, Republican Executive Committee leadership, and MAGA voters.
168. Defendant Power's conduct caused Plaintiff additional injury after the initial Complaint was filed, including injury to Plaintiff's access to District 6 Republican leadership, county chairmen and chairwomen, Republican Executive Committee members, MAGA voters, donors, media contacts, party participants, campaign supporters, and Republican voters.
169. Defendant Power's conduct also injured Plaintiff's ability to present the constitutional-information taking, Trump-lawyer sabotage, Roberts issue, Judicial

Conduct Act issue, Republican Federalism issue, and Federalist Society-controlled party structure to the voters and party leaders who need that information before the Republican primary.

170. Plaintiff suffered damages, continuing damages, campaign injury, reputational injury, donor-access injury, media-access injury, voter-access injury, party-access injury, associational injury, loss of political opportunity, and injury to Plaintiff's ability to present himself, his constitutional work, and his Republican candidacy truthfully before District 6 Republican voters.

WHEREFORE, Plaintiff demands judgment against Defendant Power for compensatory damages, special damages, consequential damages, punitive damages to the extent permitted by law, declaratory relief, injunctive relief, costs, and such other relief as the Court deems just and proper.

COUNT VII: Continuing Misuse of Party Authority, Debate Suppression, and Unequal Candidate Access

171. Plaintiff realleges paragraphs 1 through 128 as if fully set forth herein.
172. Plaintiff is a qualified Republican candidate for Congress in Florida's Sixth Congressional District and has a legally protected interest in fair, honest, non-misleading, and procedurally regular access to Republican Party mechanisms, candidate-recognition processes, debate opportunities, party communications, party events, and voter-facing Republican platforms affecting his candidacy.
173. Defendant Power holds and uses RPOF titles, RNC status, party influence, party-controlled communications, party event access, debate sanctioning power, institutional credibility, and Republican political relationships that affect Plaintiff's access to voters, donors, activists, media figures, party officers, Republican Executive Committee members, and Republican primary audiences.
174. Plaintiff alleges that Defendant Power wrongfully used, permitted, encouraged, ratified, or benefited from party authority, party access, party communications, candidate-recognition mechanisms, debate-related authority, institutional credibility, and political influence to deny, burden, obstruct, or interfere with Plaintiff's equal access to Republican voters and Republican candidate-comparison processes.
175. Plaintiff alleges that the June 27, 2026 Sunshine State Showdown and the July 7, 2026 RPOF debate statement confirm that Power understands the political force

of party-sanctioned candidate platforms, debate access, public candidate comparison, and voter-facing party communications.

176. Plaintiff alleges that Power's conduct was wrongful because Power publicly recognizes that voters deserve substantive debates and a clear choice, while denying or burdening Republican primary voters' opportunity to hear Plaintiff's substantive Republican constitutional issues before the primary.

177. Plaintiff alleges that Defendant Power's conduct was not privileged, neutral, administrative, or protected party management. Power acted as an adverse political actor and conflicted individual using party machinery to protect preferred candidates, protect the Republican legal establishment, and suppress Plaintiff's Judicial Conduct Act, Roberts, Republican Federalism, and Trump-lawyer sabotage message.

178. Plaintiff alleges that Power's selective party conduct is further shown by his harsh treatment of Plaintiff and lack of comparable response toward Dan Bilzerian's public record. Plaintiff does not seek relief against Bilzerian but alleges that Power's disparate treatment shows that Power's conduct is directed against Plaintiff's constitutional message, not against scandal, disorder, or harm to Republican ballot integrity as such.

179. Plaintiff alleges that Defendant Power's continuing misuse of party authority, debate suppression, and unequal candidate access caused additional injury to Plaintiff's campaign, reputation, voter access, donor access, media access, party access, ballot-related interests, political opportunity, and associational standing.

180. Plaintiff alleges that the injury is ongoing because the Republican primary is imminent, because party platforms and candidate-comparison opportunities are time-sensitive, and because Power's conduct prevents Republican voters from hearing Plaintiff's message before the August 18, 2026 primary.

WHEREFORE, Plaintiff demands judgment against Defendant Power for damages, declaratory relief, injunctive relief, costs, and such other relief as the Court deems just and proper.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Manuel P. Asensio respectfully requests that this Court enter judgment in his favor and against Defendant Evan Power, individually, and grant the following relief:

A. Declare that Defendant Power may not use, permit, encourage, ratify, or benefit from Republican Party titles, machinery, endorsement signals, RPOF-branded authority, or institutional influence to favor Randy Fine or any other Republican candidate over Plaintiff in a contested Republican congressional primary without compliance with the governing rules and procedures of the Republican Party of Florida, including RPOF Rule 8;

B. Declare that Defendant Power's false statements concerning the Asensio v. Cammack matter and the GOP domain application, together with his misuse of party authority, misleading implications, and denial or burdening of Plaintiff's equal access to Republican mechanisms, violated Plaintiff's rights and injured Plaintiff's candidacy, reputation, ballot-related interests, political participation, and associational standing;

C. Declare that Defendant Power is not entitled to use the authority, titles, machinery, credibility, or institutional influence of the Republican Party of Florida as a personal, factional, or conflicted weapon against Plaintiff's Republican candidacy, Republican political advocacy, GOP-domain advocacy, or constitutional policy positions;

D. Enjoin Defendant Power, individually and through persons acting in concert with him, from using, permitting, encouraging, ratifying, or benefiting from RPOF-branded authority, party machinery, party titles, endorsement signals, or institutional influence to deny, burden, obstruct, or interfere with Plaintiff's equal access to Republican Party mechanisms in connection with the 2026 Republican primary for Florida's Sixth Congressional District;

E. Enjoin Defendant Power, individually and through persons acting in concert with him, from publishing, repeating, circulating, ratifying, or relying upon false or materially misleading statements concerning Plaintiff, including statements concerning the Asensio v. Cammack matter, the GOP domain application, Plaintiff's Republican standing, Plaintiff's qualifications, Plaintiff's litigation history, Plaintiff's constitutional advocacy, and Plaintiff's candidacy;

F. Require Defendant Power to withdraw, correct, or cease relying upon any false, misleading, or unauthorized statement, endorsement signal, party communication, or RPOF-branded representation that favors Randy Fine over Plaintiff or suggests that Fine holds authorized Republican Party support or institutional party preference in violation of RPOF Rule 8;

G. Declare that Defendant Power may not use, permit, encourage, ratify, or benefit from Republican Party titles, machinery, communication channels, endorsement signals, RPOF-

branded authority, institutional influence, or party-controlled access to obstruct, suppress, distort, or sabotage Plaintiff's effort to present his constitutional information, Republican Federalism position, Judicial Conduct Act position, Roberts-related record, and Trump-lawyer sabotage evidence to Sharon Demers, the District 6 Republican county chairs, Republican Executive Committee leadership, MAGA voters, donors, media contacts, party participants, and Republican voters in Florida's Sixth Congressional District;

H. Enjoin Defendant Power, individually and through persons acting in concert with him, from using, permitting, encouraging, ratifying, or benefiting from party position, party machinery, endorsement signals, political pressure, false statements, misleading implications, or his relationship with Randy Fine to deny, burden, obstruct, or interfere with Plaintiff's access to Sharon Demers, the Republican Party of Florida Congressional Caucus for District 6, District 6 Republican county chairs, Republican Executive Committee leadership, MAGA voters, donors, media contacts, party participants, and Republican voters;

I. Require Defendant Power to cease any continuing use of Republican Party authority, party communications, party influence, RPOF-branded credibility, or institutional position to suppress, distort, obstruct, or sabotage Plaintiff's effort to bring the District 6 constitutional debate before Republican leadership and voters;

J. Award Plaintiff compensatory damages in an amount to be determined by the trier of fact for injury to Plaintiff's reputation, candidacy, political participation, donor access, media access, voter access, party access, ballot-related interests, associational standing, and post-filing access to District 6 Republican leadership, county chairs, Republican Executive Committee members, MAGA voters, donors, media contacts, party participants, and Republican voters;

K. Award Plaintiff special damages, consequential damages, and any other damages proven at trial;

L. Award Plaintiff punitive damages to the extent permitted by law based on Defendant Power's knowing, reckless, malicious, intentional, or bad-faith misuse of party authority, false statements, interference with Plaintiff's Republican political relationships, and post-filing sabotage of Plaintiff's access to District 6 Republican communications and leadership structures;

M. Award Plaintiff taxable costs and any recoverable fees permitted by law;

N. Retain jurisdiction to enforce any declaratory or injunctive relief entered by the Court; and

O. Grant such other and further relief as the Court deems just, equitable, and proper.

P. Declare that Defendant Power may not deny, burden, obstruct, or interfere with Plaintiff's equal opportunity to present his candidacy and constitutional policy to Republican primary voters;

Q. Enjoin Defendant Power, individually and through persons acting in concert with him, from using RPOF-branded authority, debate sanctioning authority, event-access authority, party communications, political pressure, or institutional influence to suppress, distort, or obstruct Plaintiff's participation in Republican candidate-comparison process in the Republican 2026 primary;

R. Declare that Power's July 7, 2026 statement applies with equal or greater force to Republican primary voters rights to hear the differences among Republican candidates before the primary, and not bury and conceal them.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury on all issues so triable.

Dated: July 8, 2026.

Respectfully submitted,



MANUEL P. ASENSIO
Plaintiff, pro se
5122 A1A South
St. Johns County, Florida 32080

Telephone: (561) 946-1000
Email: info@stjohnsgop.org