

IN THE CIRCUIT COURT, FOURTH  
JUDICIAL CIRCUIT, IN AND FOR  
DUVAL COUNTY, FLORIDA

CASE NO.: 2026-CA-4155

DIVISION: CV-H

REPUBLICAN EXECUTIVE COMMITTEE OF DUVAL COUNTY  
Plaintiff,

v.

ADDISON LIBERTY PATRICK, a candidate for nomination  
as a Libertarian-Party candidate and,  
JERRY HOLLAND, in his official capacity as Supervisor of  
Elections for Duval County, Florida.  
Defendant(s).

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**VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE  
RELIEF TO ENFORCE FLORIDA STATUTES SECTION 99.021(1)(g)**

Plaintiff, **Republican Executive Committee of Duval County** ("Plaintiff"),  
sues Defendants **Addison Liberty Patrick** ("Patrick") and **Jerry Holland**, in his  
official capacity as Supervisor of Elections for Duval County, Florida  
("Supervisor"), and alleges:

**INTRODUCTION**

- 1.- This is a pre-election action under section 99.021(1)(g), Florida Statutes,  
challenging the qualification and ballot placement of Defendant **Addison Liberty  
Patrick** as a Libertarian Party candidate.
- 2.- Florida law requires a person seeking nomination as a candidate of a political  
party to have been a registered member of that political party for the three hundred

and sixty-five (365) day period preceding the beginning of qualifying for the general election for which the person seeks to qualify.

3.- Compliance with that three hundred and sixty-five (365) day party-registration requirement is a mandatory substantive requirement under section 99.021(1)(g), Florida Statutes.

4.- Plaintiff brings this action because Defendant Patrick was not a registered member of the Libertarian Party for the full three hundred and sixty-five (365) day period preceding the beginning of qualifying and therefore may not be qualified as a Libertarian Party candidate and may not have her name appear on the ballot as such.

5.- Plaintiff seeks expedited declaratory and injunctive relief requiring that Defendant Patrick be declared not qualified for nomination as a Libertarian Party candidate and requiring the Supervisor to omit, remove, or otherwise not print Defendant Patrick's name on the ballot as a Libertarian Party candidate, to the extent ballots have not yet been printed or finalized.

### PARTIES

6.- Plaintiff **Republican Executive Committee of Duval County is a political party with qualified candidate, Deborah Wesley, in the same race as Defendant Patrick** and is authorized to bring this action under section 99.021(1)(g), Florida Statutes.

7.- Plaintiffs address is **2051 Art Museum Drive, Jacksonville Florida 32218.**

8.- Defendant **Addison Liberty Patrick** is a candidate who has sought, or is seeking, nomination as a Libertarian Party candidate for **City Council at Large Seat Number One (1)** in the **2026 Special Unitary Election Cycle.**

9.- Defendant Patrick's address is **9378 Arlington Expressway PMP 204, Jacksonville FL 32225.**

10.- Defendant **Jerry Holland** is the Supervisor of Elections for Duval County, Florida, and is sued solely in his official capacity.

11.- The Supervisor is responsible for administering elections in Duval County and for performing duties necessary to prepare, print, distribute, and administer ballots for elections conducted in Duval County.

### JURISDICTION AND VENUE

12.- This Court has subject-matter jurisdiction over this action under article V, section 5 of the Florida Constitution, chapter 86, Florida Statutes, and section 99.021(1)(g), Florida Statutes.

13.- Section 99.021(1)(g), Florida Statutes, expressly authorizes a challenge to compliance with the three hundred and sixty-five (365) day party-registration requirement by filing an action in the circuit court for the county in which the qualifying officer is headquartered.

14.- Venue is proper in this Court because Defendant Patrick qualified, or attempted to qualify, for an office for which the qualifying officer is headquartered in Duval County, Florida, and because Defendant Holland, the Supervisor of Elections for Duval County, is in Duval County.

15.- This action is ripe because Defendant Patrick has sought, or is seeking, qualification and ballot placement as a Libertarian Party candidate, and the ballots for the applicable election will be prepared, printed, mailed, or otherwise finalized unless this Court grants expedited relief.

16.- There is an actual, present, and bona fide controversy concerning Defendant Patrick's compliance with the mandatory three hundred and sixty-five (365) day party-registration requirement and her legal entitlement to qualification and ballot placement as a Libertarian Party candidate.

## STATUTORY FRAMEWORK

17.- Under section 99.021(1)(b), Florida Statutes, any person seeking to qualify for nomination as a candidate of any political party must state in writing, at the time of subscribing to the candidate's oath or affirmation:

a.- the party of which the person is a member; and

b.- that the person has been a registered member of the political party for which the person is seeking nomination as a candidate for at least three hundred and sixty-five (365) consecutive days preceding the beginning of qualifying for the election for which the person seeks to qualify.

18.- Under section 99.021(1)(g), Florida Statutes, the statements required by section 99.021(1)(b) concerning the three hundred and sixty-five (365) day party-registration requirement constitute substantive requirements, and compliance with those requirements is mandatory.

19.- Section 99.021(1)(g), Florida Statutes, further provides that compliance may be challenged by a qualified candidate or a political party with qualified candidates in the same race by filing an action in the circuit court for the county in which the qualifying officer is headquartered.

20.- Section 99.021(1)(g), Florida Statutes, provides that a person may not be qualified as a candidate for nomination or election, and her name may not appear on the ballot, if, in an order that has become final, the court determines that the person seeking to qualify for nomination as a candidate of any political party has not been a registered member of that party for the three hundred and sixty-five (365) day period preceding the beginning of qualifying.

21.- Under section 99.061(7)(a), Florida Statutes, a candidate for partisan office must submit the written statement of political-party affiliation required by section 99.021(1)(b), Florida Statutes.

22.- Under section 99.061(7)(c), Florida Statutes, the filing officer's review of qualifying papers is ministerial and ordinarily limited to whether required items have been properly filed and are complete on their face. Section 99.021(1)(g), however, provides the express judicial enforcement mechanism for the substantive 365-day party-registration requirement, “his or her name may not appear on the ballot.”

### FACTUAL ALLEGATIONS

23.- Defendant Patrick has sought to qualify, or has qualified, as a Libertarian Party candidate for **City Council at Large Seat Number One (1)** in the **2026 Special Unitary Election Cycle**.

24.- The beginning of the qualifying period for the office sought by Defendant Patrick was **June 12, 2026**.

25.- The three hundred and sixty-five (365) day period preceding the beginning of qualifying therefore ran from **June 11, 2025**, through **June 11, 2026**.

26.- To qualify as a Libertarian Party candidate, Defendant Patrick was required to have been a registered member of the Libertarian Party for that entire three hundred sixty-five (365) day period.

27.- Defendant Patrick was not a registered member of the Libertarian Party for the entire 365-day period preceding the beginning of qualifying.

28.- Specifically, Defendant Patrick was registered as **Republican** during at least part of the three hundred and sixty-five (365) day period preceding the beginning of qualifying.

29.- Defendant Patrick became registered as a Libertarian Party member on or about **November 12, 2025**, which was fewer than three hundred sixty-five (365) consecutive days before the beginning of qualifying.

30.- Alternatively, and in the event discovery or election records establish a different date, Defendant Patrick's voter-registration history shows that she did not maintain continuous Libertarian Party registration for the full 365-day period preceding the beginning of qualifying.

31.- Defendant Patrick therefore did not satisfy the mandatory substantive requirement imposed by section 99.021(1)(b) and enforceable under section 99.021(1)(g), Florida Statutes.

32.- Unless this Court grants relief, Defendant Patrick's name may appear on the ballot as a Libertarian Party candidate despite her failure to satisfy the statutory prerequisite for such candidacy.

33.- Ballot preparation, printing, mailing, and election-administration deadlines require expedited judicial determination of this action.

### COUNT 1 - DECLARATORY RELIEF

#### **Violation of Section 99.021(1)(b) and (g), Florida Statutes**

34.- Plaintiff realleges paragraphs 1 through 33 as if fully set forth herein.

35.- Plaintiff is authorized to bring this action under section 99.021(1)(g), Florida Statutes, because Plaintiff is **a political party with qualified candidate, Deborah Wesley, in the same race.**

36.- Defendant Patrick is seeking nomination as a candidate for the Libertarian Party.

37.- Defendant Patrick was required to have been a registered member of the Libertarian Party for the three hundred and sixty-five (365) day period preceding the beginning of qualifying.

38.- Defendant Patrick was not a registered member of the Libertarian Party for the full three hundred and sixty-five (365) day period preceding the beginning of

qualifying because she switched from the Republica Party to Libertarian on November 12, 2025.

39.- Defendant Patrick therefore failed to satisfy a mandatory substantive qualification requirement under section 99.021(1)(b) and (g), Florida Statutes.

40.- An actual controversy exists concerning whether Defendant Patrick is legally qualified to appear on the ballot as a Libertarian Party candidate.

41.- Plaintiff is in doubt concerning the parties' respective rights, obligations, and legal relations, including whether Defendant Patrick may lawfully remain qualified and whether the Supervisor may lawfully include Defendant Patrick's name on the ballot as a Libertarian Party candidate.

42.- Plaintiff has a present and practical need for a declaration because election deadlines are imminent and ballot preparation cannot await ordinary post-election remedies.

43.- Plaintiff is entitled to a declaration that Defendant Patrick did not satisfy the 365-day party-registration requirement imposed by section 99.021(1)(b), Florida Statutes.

44.- Plaintiff is further entitled to a declaration that Defendant Patrick may not be qualified as a Libertarian Party candidate and that her name may not appear on the ballot as a Libertarian Party candidate for **City Council at Large Seat Number One (1)**.

## **WHEREFORE**

Plaintiff respectfully requests that this Court enter judgment:

45.- Declaring that Defendant Addison Liberty Patrick was not a registered member of the Libertarian Party for the three hundred and sixty-five (365) day period preceding the beginning of qualifying;

46.- Declaring that Defendant Patrick failed to satisfy the mandatory substantive requirement of section 99.021(1)(b) and (g), Florida Statutes;

47.- Declaring that Defendant Patrick may not be qualified as a Libertarian Party candidate for **City Council at Large Seat Number One (1)** in the **2026 Special Unitary Election Cycle**;

48.- Declaring that Defendant Patrick's name may not appear on the ballot as a Libertarian Party candidate for **City Council at Large Seat Number One (1)**,

49.- Granting such further relief as the Court deems just and proper.

## COUNT II - TEMPORARY AND PERMANENT INJUNCTIVE RELIEF

50.- Plaintiff realleges paragraphs 1 through 33 as if fully set forth herein.

51.- Defendant Patrick failed to satisfy the mandatory three hundred sixty-five (365) day party-registration requirement for nomination as a Libertarian Party candidate.

52.- Under section 99.021(1)(g), Florida Statutes, a person who has not been a registered member of the political party for the required three hundred sixty-five (365) day period may not be qualified as a candidate for nomination or election and may not have her name appear on the ballot.

53.- Plaintiff has a clear legal right to enforcement of the mandatory statutory requirements governing candidates in the same race.

54.- Defendant Holland, in his official capacity as Supervisor of Elections for Duval County, is responsible for administering the election in Duval County, including ballot preparation and implementation of lawful candidate-qualification determinations.

55.- Unless enjoined, Defendant Patrick may remain qualified and Defendant Holland may include, print, publish, distribute, mail, or otherwise maintain Defendant Patrick's name on the ballot as a Libertarian Party candidate.

56.- Plaintiff will suffer irreparable harm if an unqualified candidate appears on the ballot because of the injury to the integrity of the candidate-qualification process, the ballot, and the election cannot be adequately remedied by money damages.

57.- Plaintiff has no adequate remedy at law because election deadlines are imminent and post-election relief would be incomplete, disruptive, and potentially inadequate.

58.- The threatened injury to Plaintiff and to the integrity of the election process outweighs any harm to Defendants because Defendant Patrick has no lawful interest in appearing on the ballot as a party candidate if she did not satisfy the mandatory statutory requirement.

59.- Injunctive relief serves the public interest by ensuring that candidates appearing on the ballot satisfy mandatory statutory qualifications and that voters are presented with a lawful ballot.

60.- Plaintiff is substantially likely to succeed on the merits because Defendant Patrick was not registered as a member of the Libertarian Party for the full three hundred sixty-five (365) day period preceding the beginning of qualifying.

61.- Because of the proximity of election deadlines, Plaintiff requests that this Court set this matter for an immediate expedited hearing and enter temporary and permanent injunctive relief as appropriate.

## **WHEREFORE**

Plaintiff respectfully requests that this Court enter temporary and permanent injunctive relief:

62.- Enjoining Defendant Patrick from representing herself as a qualified Libertarian Party candidate for **City Council at Large Seat Number One (1) in the 2026 Special Unitary Election Cycle**;

63.- Enjoining Defendant Holland, in his official capacity as Supervisor of Elections for Duval County, from including, printing, publishing, distributing, mailing, or otherwise maintaining Defendant Patrick's name on any ballot as a Libertarian Party candidate for **City Council at Large Seat Number One (1)** to the extent ballots have not already been printed, mailed, or finalized;

64.- Requiring Defendant Holland, in his official capacity, to take all lawful and practicable steps necessary to remove or omit Defendant Patrick's name from the ballot as a Libertarian Party candidate;

65.- Setting this matter for an immediate expedited hearing;

66.- Waiving bond or setting bond in a nominal amount because this action seeks enforcement of mandatory election-law requirements and does not seek monetary relief; and

67.- Granting such further relief as the Court deems just and proper.

### **REQUEST FOR EXPEDITED HEARING**

68.- Plaintiff requests an immediate expedited hearing due to the time-sensitive nature of ballot preparation, ballot printing, vote-by-mail ballot distribution, early voting, and election administration.

69.- Plaintiff further requests that the Court enter an expedited briefing schedule and such other case-management orders as are necessary to resolve this matter before ballot finalization or distribution deadlines.

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

70.- Assume jurisdiction over this action;

71.- Set this matter for an immediate expedited hearing;

72.- Declare that Defendant Addison Liberty Patrick did not satisfy the three hundred sixty-five (365) day party-registration requirement under section 99.021(1)(b) and (g), Florida Statutes;

73.- Declare that Defendant Patrick may not be qualified as a Libertarian Party candidate for **City Council at Large Seat Number One (1)** in the **2026 Special Unitary Election Cycle**;

74.- Declare that Defendant Patrick's name may not appear on the ballot as a Libertarian Party candidate for **City Council at Large Seat Number One (1)**

75.- Temporarily and permanently enjoin Defendant Patrick from appearing on the ballot as a Libertarian Party candidate for **City Council at Large Seat Number One (1)**

76.- Temporarily and permanently enjoin Defendant Holland, in his official capacity as Supervisor of Elections for Duval County, from including, printing, publishing, distributing, mailing, or maintaining Defendant Patrick's name on any ballot as a Libertarian Party candidate for **City Council at Large Seat Number One (1)** to the extent such relief is practicable and lawful;

77.- Require Defendant Holland, in his official capacity, to take all lawful and practicable steps necessary to remove or omit Defendant Patrick's name from the ballot per Florida Statute 99.021(1)(g);


78.- Award Plaintiff costs and such other relief as may be available by law;

79.- Waive bond or set bond in a nominal amount; and

80.- Grant such further relief as the Court deems just and proper.

**VERIFICATION**

Under penalties of perjury, I declare that I have read the foregoing Verified Complaint and that the facts stated in it are true and correct to the best of my knowledge and belief.

Signed by:  
  
C55A984361624BB

**RESPECTFULLY SUBMITTED,**

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a copy of the foregoing has been served via the Florida Supreme Court online portal on Defendant's counsel on June 26, 2026.

\_\_\_\_\_/s/ Luis A. Montiel\_\_\_\_\_  
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