

GENERAL COMPLAINT

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

FILED - CLERK
DISTRICT COURT
2001 SEP 13 PM 4:22
TX EASTERN - LUFKIN
BY DH

Progressive Missionary Baptist Church
Margaret Louise Pursett prose

(Enter above the full name of each plaintiff in this action.)

vs. City of Crockett - Wayne Mark Mager
City Administrator - Bill Harn

9:01cv173

Houston County Judge - Chris C R Von Doenhoff
349th District Attorney - Cindy Maria Garner

(Enter above the full name of each defendant in this action. DO NOT USE "ET AL.")

"see attached"

I. ATTEMPT TO SECURE COUNSEL:

Please answer the following concerning your attempt to secure counsel:

A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (Circle One).

1. Employ Counsel
2. My Court-Appointed Counsel
3. Lawyer Referral Service of the State Bar of Texas, P. O. Box 12487, Austin, TX 78711.

B. The name(s) and address(es) of the attorney(s): Andrew McHee;

John Henry Sartum - PO Box 582 - Lufkin TX 75904-0582
Andrew Jefferson; 1314 Texas Avenue Ste 420, Houston
Texas 77002; Carnegie Mims - 203 Candlen Dr
Houston Texas 77037; Joe B Phillips 11811 E. Freeway Ste 100
Houston TX 77029.

C. Result of the conference with counsel: all attorneys wanted

money - Andrew Jefferson; Carnegie Mims.
works with attorney Jefferson; Andrew McHee
John Henry Sartum; Joe B Phillips.

14

- 2 -

II. PREVIOUS LAWSUITS:

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or any other incidents. YES NO

B. If your answer to "A" is "yes," describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, giving the same information.)

1. Approximate date of filing lawsuit: 03-02-01

2. Parties to previous lawsuit:

Plaintiff(s) Harry Fred Scott - Progressive Church
 Defendant(s) see attached list

3. Court: (If federal, name the district; if state, name the county.) Eastern District of Texas Lufkin Division

4. Docket Number: 9:01-CV-173

5. Name of judge to whom case was assigned: Judge John H. Hannah, Jr

6. Disposition: (Was the case dismissed? appealed? still pending?)

Pending

7. Approximate date of disposition: 07-17-01

III. PARTIES TO THIS SUIT:

A. Name and address of each plaintiff: Margaret Louise Burnett pass
149 Lewis Circle - Crockett, TX 75835-3111
Progressive Missionary Baptist Church - 311 W Oak Avenue - Crockett TX 75835-3012

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: Wayne Mack - City of Crockett - Mayor
200 N 5th Street
Crockett TX 75835

Defendant #2: Bill Horn - City of Crockett Administrator
200 N 5th Street
Crockett TX 75835

III. PARTIES TO THIS SUIT:

B. Defendant #3: Honorable R C "Chris" Von Doenhoff -
Houston County Judge - 401 East Houston Avenue,
Crockett, Texas 75835.

Defendant #4: Cindy Maria Garner - 349th District
Attorney - Houston County Courthouse, 3rd Floor.
P O Box 1076, Crockett, Texas 75835.

Defendant #5: Honorable Dianne Rhone - Houston
County Treasurer - 401 East Houston Avenue,
Crockett, Texas 75835

Defendant #6: Honorable Pam Pugh - 349th District
Clerk - P O Box 1186 - Crockett, Texas 75835.

Defendant #7: Honorable Evelyn Franks - Justice
Of The Peace Precinct #2 - 110 East Houston Avenue,
Crockett, Texas 75835

Defendant #8: THE STATE OF TEXAS

Defendant #9: Dick Tedford - Refuge Officer

Defendant #10: Crockett City Council

Defendant #11: William "Bill" Hyman - Houston
County Probation Officer -

Defendant #12: Jimbo Rains - Houston County
Sheriff - 142 S Grace Street - Crockett, TX 75835.

1. STATE YOUR NAME Margaret Louise Burnett.
2. DATE OF BIRTH April 6, 1936.
3. LIVE 149 Lewis Circle Crockett TX 75835.
4. STATE IF YOU ARE A CHRISTIAN Yes.
5. PLEASE STATE A TEACHING OF JESUS FEEDING THE HUNGRY, CLOTHING THE NAKED, VISITING THE SICK, INVOLVEMENT WITH PRISONERS, AND SHELTER FOR THE HOMELESS Corinthians 13; through 3rd verses.
6. PLEASE STATE IF YOUR PASTOR TEACHES THIS DOCTRINE Yes, he does, Every Sunday.
7. STATE IF YOU BELIEVE THAT THE COMMUNITY INITIATIVE APPLIES TO YOUR WORKS OF THE CHURCH The Progressive Missionary Baptist Church makes contributions to The Houston County Share Foundation every Sunday.
8. STATE IF YOU HAVE INVOLVED YOURSELF IN FEEDING THE HUNGRY, CLOTHING THE NAKED, VISITING THE SICK, GIVING SHELTER TO THE NEEDED Yes There's home visits for the sick, donations being initiated.
9. ARE YOU A WITNESS TO PROGRESSIVE MISSIONARY BAPTIST CHURCH HAVING A PROGRAM IN THE CHURCH THAT INVOLVES ANY OF THE ABOVE Yes, Contributes donations.
10. HAVE YOU CONTRIBUTED MONEY, LABOR, OR ANY INVOLVEMENT AS A PARTICIPANT IN THE PROGRESSIVE MISSIONARY BAPTIST CHURCH PROGRAM Yes - Work at Houston County Share two (2) days every week. ?
11. HAVE A DIRECT INVOLVEMENT OR, ARE YOU A WITNESS TO INMATES WORKING IN YOUR COMMUNITY INITIATIVE PROGRAM OF REVITALIZATION Yes ?

12. DO YOU AGREE WITH THE CITY OF CROCKETT HAVING A BETTER PROGRAM THAN PROGRESSIVE MISSIONARY BAPTIST CHURCH FOR CLEANING UP YOUR COMMUNITY NO our

Church provided a better "Clean-Up Community Program" ?

13. STATE WHY YOU FEEL YOUR PROGRAM IS BETTER OR THE CITY PROGRAM IS BETTER The Progressive Missionary Baptist

Church program is far better than the City because we will not threaten any jail time.

14. WHAT AFFECT WILL THE CITY ORDINANCES HAVE ON YOU, YOUR CHILDREN, OR OTHER RELATIVES AND FRIENDS We can't

afford jail fines.

15. IF YOU BELIEVE IN CONJUGAL VISITS FOR PRISONERS, PLEASE STATE SO yes

16. IF YOU BELIEVE THAT PEOPLE IN HOUSTON COUNTY HAVE GOOD JOB OPPORTUNITIES, PLEASE STATE SO No, there's

not any good job opportunities in Houston County

17. IF YOU BELIEVE YOU ARE MAKING ENOUGH OR TOO MUCH MONEY, PLEASE STATE SO No - The salary pay is

way below the pay salary

18. IF YOU BELIEVE YOUR INCOME LEVEL IS LESS THAN THE NATIONAL, PLEASE STATE SO Yes, because we do

not receive minimum wages

19. IF YOU BELIEVE THAT BLACK PEOPLE ARE ABLE TO PROVIDE JOBS FOR THEMSELVES, THEIR FAMILIES, OR ANY ONE ELSE, PLEASE STATE SO No - because the Mayor - City

of Crockett - Administrator - Bill Horn and other City Council persons blocks grants from our needs

20. IF YOU BELIEVE HOUSING IS ADEQUATE, PLEASE STATE SO

NO!

21. IF YOU BELIEVE THAT THE **FAITH Based** COMMUNITY INITIATIVE IS A PROGRAM THAT YOUR CHURCH WAS INVOLVED WITH, PLEASE STATE SO Yes - Progressive Missionary Baptist Church members gave food each day to the inmates while cleaning up the community.

22. IF YOU BELIEVE THAT YOUR PROGRAM WAS INTERRUPTED OR DISCONTINUED, PLEASE STATE SO Yes - this movement was wrongfully disrupted through having malice in their hearts.

23. IF YOUR CHURCH ADDRESSES THE ABOVE BIBLE TEACHING OF JESUS AND WAS WRONGFULLY DISCONTINUED BY A PERSON OR PERSONS OF AUTHORITY, IS THIS LAWSUIT ADDRESSING THAT ISSUE Yes - through twenty (20) or thirty (30) lawsuits filed ?

24. IF DISCRIMINATION AGAINST A RELIGIOUS GROUP VIOLATES FEDERAL LAW, IS THIS LAWSUIT ADDRESSING DISCRIMINATION Yes - Our Pastor, Harry Fred Scott teaches us against discrimination and let the law of the land handle all ill feelings. ?

11

complaint

- 1) SALES TAX - PEOPLE THAT LIVE IN PROJECTS, OWN HOMES, HAVE TO PAY SALES TAX.
- 2) EVERYONE IN CROCKETT IS SUBJECTED TO STREETS, WATER, SEWER, EQUIPMENT, MAYOR, ADMINISTRATOR, POLICE, RATES, TAXES, RENT, LOANS, AND GRANTS.
- 3) THE MAYOR, CITY ADMINISTRATOR, CITY SECRETARY, CITY TREASURER, CITY ATTORNEY, DEPARTMENT HEADS, AND CITY COUNCIL RUNS CROCKETT. THE BLACK VOTERS VOICES ARE INTIMIDATED BY BOSSMAN AND COERCING BY THE RICH.
- 4) THE STRONGEST ECONOMICAL IMPACT TO CROCKETT IS REALIZED THROUGH THE TAX BASE, PAYABLE SERVICES, FINES, ECONOMICAL DEVELOPMENT CORP, 1/2 CENT SALES TAX, LOANS, GRANTS, WATER FEES, AND PROCEEDS FROM CITY PROPERTIES.
- 5) THE CITY OF CROCKETT OPERATES UNDER A HOME RULE CHARTER.
- 6) THE CITY OF CROCKETT IS SUBORDINATE TO RULES AND LAWS TO THE STATE OF TEXAS THE U S CONSTITUTION AND FEDERAL LAWS.

- 7) THE CITY OF CROCKETT AND COUNTY OF HOUSTON, SHARES AN EMPLOYEE, CODE ENFORCEMENT OFFICER, IN THE PERSON OF MR RICHARD DICK TEDFORD.

- 8) THE CITY OF CROCKETT, CROCKETT ECONOMIC AND INDUSTRIAL DEVELOPMENT CORP AND COUNTY OF HOUSTON ARE MEMBERS TO THE DEEP EAST TEXAS COUNCIL OF GOVERNMENT IN JASPER, TEXAS. NEITHER PAYS THE TRAVEL FEES TO DEEP EAST TEXAS COUNCIL MEETINGS FOR ITS MINORITY REPRESENTATIONS, BUT PAYS FOR THE JUDGE AND COUNTY COMMISSIONER AND OTHERS ELECTED OR EMPLOYED.

- 9) MOST FEDERAL, STATE, CORPORATIONS, AND FOUNDATION FUNDS APPLIED FOR THROUGH GRANTS AND SOME LOANS ARE APPROVED THROUGH DEEP EAST TEXAS COUNCIL GOVERNMENT. MINORITIES ARE EXCLUDED FROM A FAIR SHARE BY SEVERAL MEANS INCLUDING THE RULE OF DUPLICATION OF SERVICES.

- 10) THE VOTING RIGHTS ACT RECOGNIZES U S CENSUS POPULATION COUNT APPLICABLE STATES, DISTRICTS, CONGRESSIONAL DISTRICTS, INDIAN RESERVATION, COUNTIES, SCHOOL DISTRICTS, CITIES, SPECIAL DISTRICTS, AND GROUPS OF COUNTIES. COMPRISING AN AREA COUNCIL OF GOVERNMENTS.

11) THE BUREAU OF CENSUS HAS A NET DOLLAR WORTH ATTRIBUTED TO EACH INDIVIDUAL. EACH VOTE IN A TOWN OR CITY HAS A DOLLAR AMOUNT OVER A 10 YEAR PERIOD ACCORDING TO THE BUREAU OF CENSUS. EVERYONE FOR THE MOST PART IN THIS LAWSUIT IS A CITIZEN OF THE STATE OF TEXAS AND LIVES WITHIN DEEP EAST TEXAS. CROCKETT HAS ONE MAYOR, ONE CITY COUNCIL, ONE FIRE DEPARTMENT, ONE POLICE DEPARTMENT, ONE ECONOMIC INDUSTRIAL DEVELOPMENT CORP, ONE STREET DEPARTMENT, ONE WATER DEPARTMENT, AND PLACES CITY PRISONERS IN THE COUNTY JAIL. SEVENTEEN (17) WERE ARRESTED UNDER THE LOITERING LAW IN A MATTER OF DAYS.

12) IN THIS LAWSUIT ALL PLAINTIFFS LIVES WITHIN THE UNITED STATES OF AMERICA, THE STATE OF TEXAS, AND WITH FEW EXCEPTIONS, LIVE WITHIN DEEP EAST TEXAS AREA COUNCIL OF GOVERNMENT BUT DOES NOT HAVE MEANINGFUL INPUT IN DRAWING STATE REPRESENTATIVE LINES THAT SO GREATLY DETERMINE MANY FACTORS IN OUR MEANS OF LIVELYHOOD. THERE HAS NOT BEEN A BLACK ELECTED FROM DEEP EAST TEXAS TWELVE (12) COUNTY, AREA SINCE 1896. WE MERIT REPRESENTATION!

- 13) THIS LAWSUIT FOCUSES ON THE STATE OF TEXAS. TEXAS CRIMINAL JUSTICE SYSTEM, TEXAS ELECTION CODE, THE UNITED STATES VOTING RIGHTS ACT, 1965, THE GOVERNMENT OF HOUSTON COUNTY, THE GOVERNMENT OF THE CITY OF CROCKETT, CONGRESSIONAL DISTRICTS OF TEXAS, JUDICIAL DISTRICTS, SCHOOL DISTRICTS, COMMISSIONER COURT, COUNTY LAW, CITY ORDINANCE, LAW ENFORCEMENT IN TEXAS.

- 14) THIS LAWSUIT DEALS WITH OPPRESSION, CIVIL RIGHTS VIOLATION, U S CONSTITUTIONAL LAW, CIVIL LAWS WITH CIVIL RIGHTS VIOLATIONS THAT COULD BE BASIC CIVIL RIGHTS BECAUSE IT'S ALL FROM DISCRIMINATION.

- 15) FOR THE MOST PART, MOST OF THE PLAINTIFFS LIVES IN THE CITY OF CROCKETT, WITHOUT EXCEPTIONS, PLAINTIFFS ARE A PROTECTIVE CLASS UNDER THE 1964 CIVIL RIGHTS ACT. THE CITY, COUNTY, SCHOOL DISTRICTS AND COUNCIL OF GOVERNMENT ACTS WITHOUT REGARD TO CIVIL RIGHTS.

- 16) ANY PLAINTIFF LIVING OUTSIDE OF THE CITY OF CROCKETT IS CLEARLY IDENTIFIABLE.

17) INSTANCES IN THIS LAWSUIT : INVOLVES
DISPARITY IN TREATMENT. WE BELIEVE THAT WHILE WE
HAVE A NEXUS IN THE WAY THAT WE ARE ADVERSITY
IMPACTED BY THE CITY ORDINANCE IN CROCKETT, 10%
QUOTA, ORDINANCE ON LOITERING, ORDINANCE ON CURFEW,
BAD STREETS, HIGH WATER BILLS, LACK OF PAVED
STREETS, AREAS WITHOUT CITY SEWER, OVER GROWN WITH
SHRUBBERY AND VEGETATION LOTS, RUN DOWN SHACKS,
BLOCKED UP CULVERTS, DITCHES NEEDING ATTENTION,
VOTING RIGHTS ACT, PRIVACY ACT, RULES OF CONFIDEN-
TIALITY NEEDING IMPLEMENTATION IT IS ALSO NEEDED
IN BOTH STATE AND FEDERAL CONSTITUTION LAWS. WE
ARE ABLE TO SEPERATE PLAINTIFFS INTO GROUPS, HAVE
A NEXUS WITH CLAIMS IN INDIGENT DEFENSE, CONJUGAL
VISITS IN PRISONS, H I V FIRUS, AND A I D S IN
PRISON POPULATION, NO MORE PRISON BEDS RATIONALE
CASES FROM DISCRIMINATION BY AGE CLASSIFICATION
SUBJECTING THE WORK FORCE TO H I V VIRUS AND
PERSONS INFECTED BY A I D S DISEASE NOT GIVEN
QUALITY MEDICAL ATTENTION.

18) WE HAVE A NEXUS IN THE FAILURE OF OUR TEXAS
ELECTED OFFICIALS TO PROVIDE RECROPRICITY IN
EXCHANGE FOR OUR VOTES. WHERE WE HAVE POPULATIONS
IN TOWNS REFLECTING A MINIMUM OF 40% MINORITY VOTE,

WE CERTAINLY EXPECT THAT WHERE THE BLACK VOTE RISES TO THAT 40% THAT SOMEBODY BLACK SHOULD BE ELECTED TO SOME POSITION IN THAT TOWN. WE BELIEVE THAT OUR STREETS ARE POORLY MAINTAINED, OUR LOTS ARE OVERGROWN AND MOST OF THE TORN UP HOUSES IN THE CITIES AND TOWNS IN DEEP EAST TEXAS HAVE ACCUMULATED BY THE CITY ELECTED OFFICIALS AND ADMINISTRATOR FAILURE TO SEEK ADEQUATE FEDERAL AND STATE GOVERNMENT FUNDS. WE BELIEVE THAT NON-PROFIT CORPORATIONS, NON-PROFIT FOUNDATIONS AND RELIGIOUS GROUPS SHOULD NOT BE EXCLUDED FROM FUNDS THAT WOULD HELP ELIMINATE BLIGHTED NEIGHBORHOODS, POOR CITY SERVICE, AND THE OPERATING OF PROGRAMS THAT WOULD REDUCE POVERTY AND CRIME. STRINGS BEING ATTACHED BY THE GIVERS OF LOANS AND GRANTS SHOULD NOT STOP THOSE FUNDS FROM REMOVING OPPRESSION. WE BEG OF THE COURT TO ORDER OUR ~~LDG~~AL GOVERNMENT IN THE TWELVE (12) COUNTY AREAS TO ALLOW US A CHANCE TO HELP.

- 19) WE BELIEVE THAT TO DIVIDE BLACK VOTERS, IN A COMMUNITY, WHILE NOT REDUCING WHITE VOTERS IN THAT COMMUNITY, WOULD DELUTE THE VOTING STRENGTH OF THE VOTERS IN THAT COMMUNITY THAT ARE BLACK. WE BELIEVE THAT TO DIVIDE THE BLACK PLAINTIFFS INTO GROUPS WITH A COMMON NEXUS IN THIS LAWSUIT IS POSSIBLE AND EVEN NECESSARY, BUT TO DIVIDE THESE BLACK PLAINTIFFS TO A LEVEL OF INDIVIDUALISM IS TO DELUTE

THE STRENGTH THAT IS COMMON TO THE NEXUS AND WOULD DECREASE THE STRENGTH OF THE CLAIM, AND WOULD BE ASSISTNCE IN STRENGTHEN FOR WHITE DEFENDANTS TO MAINTAIN OPPRESSION.

- 20) SHOULD THE COURT DISREGARD THE OPPRESSION THAT THE CITIZENS HAVE IN COMMON OF BAD STREETS, RUN DOWN NEIGHBORHOODS, CURFEW ORDINANCE, DENIAL OF THE RIGHT TO ASSEMBLE, DENIAL OF THE FREEDOM OF SPEECH BEFORE THE CITY COUNCIL, DENIAL OF THE RIGHT TO PETITION OUR CITY GOVERNMENT (WITH HOPE OF CONSIDERATION) OF THE ISSUES CONTAINED IN THE PETITION, FREEDOM FROM DENIAL OF THE CITIZENS OBJECTIONS TO LOITERING ORDINANCE, THE 10% QUOTA PUT IN FORCE AGAINST THE OPPOSITION OF A BLACK POPULATION GREATER THAN 40% OF THE CITY TOTAL POPULATION, AND THE DENIAL OF MONIES FROM THE 1/2 CENT SALE TAX THAT COULD BE SHARED WITH BLACK CITIZENS, SPENT BY OPPRESSORS DENYING EQUAL OPPORTUNITY TO BLACK BUSINESS PERSONS AND A BLACK INSTITUTION IN MARY ALLEN COLLEGE AND SEPERATE US INTO INDIVIDUALS, WILL DELUTE THE PROTECTION OF THE 14TH AMENDMENT IN THE UNITED STATES CONSTITUTION ALONG WITH CERTAIN OTHER RIGHTS.

21) HOW CAN THE COURT GIVE US EQUAL PROTECTION OF THE LAW, UNDER THE LAW AS A PROTECTIVE CLASS BY SEPERATING US AWAY FROM THE THINGS WE HAVE IN COMMON WITHOUT DELUTING THE STRENGTH WE HAVE IN DAMAGES IN NUMBERS, ATTRIBUTED TO EACH OF THE SPECIFIC GRIEVANCE OF MERIT THAT WE HAVE IN COMMON, BY REMOVING THE BENEFITS OF STRENGTH IN NUMBER?

22) THE COURT UNDERSTANDS THAT ALL OF THE PLAINTIFFS WHO ARE POLICE OFFICERS WITH A NEXUS IN COMPLAINT COULD BE GROUPED TOGETHER AS THOSE PERSONS WITH A NEXUS IN A GRIEVANCE. A HOUSE BURNING AT 210 W OAK STREET, COULD BE GROUPED AND CONSIDERED TO HAVE A NEXUS WITH THE PLAINTIFF WHO OWNS THE HOUSE, BUT LIVED AT 204 W OAK STREET. WE UNDERSTAND THIS AS PLAINTIFFS!

23) WE MUST BE HELD TOGETHER BY THE COURT OR THE COURT MUST BE HELD RESPONSIBLE TO SEPERATING A CLASS INTO INDIVIDUALS FOR THE DEFENCE TRIAL LAWYERS TO HANG US SEPERATELY. IT WILL BECOME A CIRCUS!

- 24) WE DO NOT HAVE A HISTORY REFLECTING ANY BLACKS BEING ELECTED IN AN AT-LARGE POSITION FOR MAYOR OR CITY COUNCIL UNDER THE TEXAS ELECTION CODE AND WE HAVE A HISTORY IN CROCKETT AND HOUSTON COUNTY OF USING STATE ELECTION LAW TO OFF SET VOTING RIGHTS REQUIREMENTS.
- 25) WE HAVE A HISTORY OF SUCCESS IN THE SAME TOWN WITH THE SAME PEOPLE ELECTING BLACK CITIZENS TO PRECINCT 2, 3, AND 4 AND EVEN SERVING AS MAYOR FROM MAYOR PRO-TEM AT THE DEATH AND RESOLUTION OF WHITE MALES ELECTED TO THE POSITION OF MAYOR IN THE SINGLE MEMBER DISTRICT.
- 26) THE CITY OF CROCKETT HELD AN ELECTION IN THE YEAR 2001, USING THE 1990 CENSUS FIGURES, WHERE THE SHIFT IN POPULATION EXCEEDS 10% BY GROWTH OF CHANGE OF ADDRESS, ADDED ADDRESSES, BIRTHS, DEATHS, PER DISTRICT.
- 27) THE COUNTY OF HOUSTON HELD AN ELECTION IN 2000 USING THE CENSUS FIGURES OF 1980 WITH A POPULATION SHIFT BY INCREASE IN OVER ALL POPULATION OR SHIFT FROM OR TO PRECINCT #3 THAT DELUTED THE BLACK VOTING STRENGTH IN COUNTY COMMISSIONER PRECINCT #3.

THIS WAS A MAJORITY BLACK VOTE PRECINCT BASED UPON THE
1970 RELINING AN ADJUSTMENT OF THE CENSUS REPORT
OF REAPPORTIONMENT. THERE WAS A LAWSUIT!

- 28) THE BLACK COMMUNITY ENTERED THE 1984 ELECTION WITH
OTIS WOOTEN, BASED UPON THE NEW 1980 CENSUS FIGURES
AND ELECTED OTIS WOOTEN IN 1984 COUNTY COMMISSIONER.
HOUSTON COUNTY BLACK COMMUNITY IN PRECINCT #3
ENTERED OTIS WOOTEN IN 1987 AND HE BECAME OUR 1988
COUNTY COMMISSIONER AND SUCCESSFULLY COMPLETED HIS
TERM OF OFFICE IN 1992.
- 29) THE BLACK COMMUNITY IN COUNTY COMMISSIONER PRECINCT
#3 ENTERED BURTIS WOOTEN IN 1991 AND HE BECAME
OUR 1992 COUNTY COMMISSIONER REPLACING OTIS WOOTEN.
BURTIS WOOTEN SERVED FROM 1992, AND WAS ELECTED IN
1996 AND AGAIN FROM 1996 TO 2000.
- 30) THE 1980 FIGURES THAT ELECTED OTIS WOOTEN IN
1984 REMAINED IN PLACE WITHOUT CHANGES TO ACCOM-
ODATE THE 10% SWING IN POPULATION. THE COUNTY
PRECINCT LINES OF 1976 ARE THE SAME LINES USED IN
1984. THE 1984 PRECINCT #3 LINES ARE THE SAME LINES
FOR THE COUNTY LINES IN 2000. REVEREND HARRY FRED
SCOTT WITHDREW FROM THE COUNTY PRECINCT ELECTION
LEAVING JULIUS CLAYBORN AND ELMER MURRAY IN THE RACE.

THE FOUR (4) CANDIDATES IN THE ELECTION CONSISTS OF TWO (2) WHITES AND TWO (2) BLACKS. THE MARCH PRIMARY ELIMINATED ONE (1) WHITE AND ONE (1) BLACK CANDIDATE. THE RUN OFF WAS THEN BETWEEN WHITE CANDIDATE, PERRY AND BLACK CANDIDATE ELMER MURRAY. THE FAILURE TO CHANGE THE VOTING LINES ESTABLISHED IN 1970 AND VOTED ON FOR THE FIRST TIME IN 1976 SAW A CHANGE OF 10% IN THE 2000 ELECTION; THEREBY DEFEATING ELMER MURRAY THAT THIS LAWSUIT DEMAND TO BE RECOGNIZING ELMER MURRAY, COUNTY COMMISSIONER, BY REMOVING PERRY FROM PRECINCT #3 FOR VIOLATING THE VOTING RIGHTS ACT THROUGH THE HOUSTON COUNTY JUDGE AND COMMISSIONER COURT TIMELY HAVING LINES DRAWN OVER THE THIRTY (30) YEAR PERIOD.

31) WE ARE WITHOUT THE GUIDANCE AND ADVICE OF AN ATTORNEY AT LAW. WE DO NOT UNDERSTAND THE MEANING OF MOST TERMS THAT MAYBE GREEK EXPRESSED BY THE HONORABLE MAJESTIC JUDGE. WE DO KNOW THAT WE ARE OPPRESSED BY CITY ORDINANCE THAT ALLOWS RACIAL PROFILING AND STALKING OUR SONS, DAUGHTERS, FRIENDS AND OTHER FAMILY MEMBERS TO MAKE AN ARREST BY USING LOITERING ORDINANCE AS A TOOL TO STOP SEARCH, INTERROGATE CITIZENS UNDER THE LANGUAGE USED IN THE LOITERING ORDINANCE.

WE FEEL THAT WE HAVE A RIGHT TO EXPECT A FIRE TRUCK,
SUMMONED TO OUR NEIGHBORHOODS LOADED WITH
WATER, TIMELY, TO PUT OUT A FIRE IN OUR NEIGHBORHOODS
(AS ROUTINELY DONE) IN THE WHITE NEIGHBORHOODS. IT IS
A BLACK VS WHITE ISSUE.

- 32) THE CITY OF CROCKETT HAS A HISTORY OF VIOLATING
THE VOTING RIGHTS ACT AND DISCRIMINATING AGAINST
THE BLACK PEOPLE TO A QUOTA IN CONTRACTIAL WORK.
THE WHITE FIRE DEPARTMENT WAS TO ACCEPT BLACK
FIREMEN AND MAINTAIN BLACK FIREMEN IN ITS
COMPOSITION SINCE THE MEMORANDUM AGREEMENT OF
1987 WITH THE N.A.A.C.P.
- 33) IF THE COURTS SEPERATE US, THE RIGHTS OF INDIVIDUALS
MAY ~~CON~~CLUDE US FROM DISCUSION, THE ADVERSITY
IMPACTING MEMBERS BEYOND THE SCOPE OF THE
INDIVIDUAL ACTION THAT IS ADDRESSED IN THE
INDIVIDUAL CASE. IS IT NOT POSSIBLE FOR TWELVE
(12) PERSONS WITH A COMMON NEXUS TO GO FORWARD IN
A CLASS ACTION WITH THE SAME LAWYERS REPRESENTING
ALL OF US? WE ARE NOT LAWYERS!
- 34) WE BELIEVE, THAT THE COURT COULD DETERMINE THE
MERIT OF EACH GROUP THROUGH A COURT APPOINTED
ATTORNEY.

WE AGREE THAT WE NEED AN ATTORNEY OR SOME
ATTORNEY'S THAT WE MAY BE GIVEN EQUAL PROTECTION
UNDER THE LAW. IT IS A JOKE FOR US TO FACE
TRIAL LAWYERS!

- 35) WE CAN TELL AN ATTORNEY ABOUT THE VARIOUS WRONGS,
HURTS, DIFFERENT IN TREATMENT, BUT WE DO NOT KNOW
ABOUT CASE LAWS AND DECISIONS, NOR THE COURT OR
PROPER LAW TO APPLY IN THE ACTS PERCEIVED BY US
AS VIOLATIONS. WE ARE BEING HUMILATED GOING
PRO SE.
- 36) WE BEG OF THE COURT TO ACCEPT MOTIONS RESTRAINING
THE DEFENDANTS FROM TAMPERING WITH WITNESSES AND
HARASSING PLAINTIFFS IN THIS LAWSUIT.
- 37) WE BEG OF THE COURT TO APPOINT US AN ATTORNEY OR
ATTORNEY'S TO EXAMINE OUR CASES AND MAKE A REPORT
BACK TO THE COURT AND DO THIS WITHOUT DELUTING THE
STRENGTH OF THE CLASS TO INDIVIDUAL ACTIONS.
- 38) THROUGH THIS OBJECTION, WE ATTEMPT TO PRESERVE
ALL RIGHTS, PRIVILEGES, PROTECTION, DUE PROCESS,
STEPS AND PROCEDURES AFFORDED TO PLAINTIFFS IN
CLASS ACTION CASES. WE ARE BLACK AND POOR!

39) WE ARE SIMPLY ASKING FOR UNIFORM STANDARDS IN INDIGENT DEFENCE IN ALL COUNTIES. WE OBJECT TO THE STANDARDS BEING DIFFERENT IN SMALL COUNTIES FROM THAT IN LARGE COUNTIES IN THE NEW INDIGENT LAW. WE HAVE SONS AND GRAND CHILDREN IN PRISON, RIGHT NOW! WE ARE HURT! WE HAVE HAD FAMILY MEMBERS IN JAIL AND PRISON AND FOR THE MOST PART BECAUSE OF RACE OR COLOR.

40) SEVENTY-TWO (72) HOURS IS LONG ENOUGH TO BE IN JAIL WITHOUT BEING ABLE TO TALK TO AN ATTORNEY. WE ARE POOR FOLKS, BUT WE BELIEVE THAT THE RIGHTS OF THE POOR SHOULD BE PROTECTED. OUR PRISONS CARRIES A HIGHER PERCENTAGE OF OUR BLACK CITIZENS BECAUSE WE CANNOT AFFORD TIMELY APPOINTED, QUALITY, LAWYERS WHO ARE NOT COERCING US TO ACCEPT PLEA BARGAINING AND TO PLEAD GUILTY FOR REDUCED SENTENCED AND TELL THE JUDGE THAT WE ARE GUILTY, WHEN WE ARE NOT GUILTY, BUT MUST SAY THAT WE ARE GUILTY OR STAY IN JAIL.

41) WE DON'T WANT AN EAST TEXAS STANDARD OF COURT APPOINTED LAWYER, WE WANT A UNITED STATES STANDARDS THAT WOULD BE ACCEPTABLE IN MASSACHUSETTS, PENNSYLVANIA, CONNECTICUT, OR FOR A CUBAN CHILD THAT HAS CAMERAS, NEWSPAPERS AND TELEVISION PAPERS FROM NEW YORK, LOS ANGELES, WASHINGTON, D C, OR CHICAGO, ILLINOIS, WATCHING EVERY MOVE OF THE COURT.

42) WE DO NOT WANT ANYTHING LESS THAN WHAT THE SUPREME COURT OF THE UNITED STATES HAS RULED ON AND CERTAINLY, WE DO NOT WANT ANY STATE RULING THAT APPEARS TO GRANT US OUR RIGHTS WHILE REALLY GIVING THE DISTRICT ATTORNEY, THE SECRETARY OF STATE, THE RED CARPET TREATMENT OF NEVER ENTERING THE FEDERAL COURTHOUSE AND LEAVING US VULNERABLE TO BE INDIVIDUALLY LYNCHED.

V. RELIEF

WHEREFORE, PLAINTIFF RESPECTFULLY PRAYS THAT THIS COURT AWARD JUDGMENT IN FAVOR OF PLAINTIFF FOR VIOLATION OF THE FOREGOING STATUTES AND AWARD PLAINTIFF THE FOLLOWING:

- (A) ACTUAL AND CONSEQUENTIAL DAMAGES AS MAY BE PROVEN, PLUS INTEREST.
- (B) COMPENSATORY DAMAGES TO COMPENSATE FOR THE PAIN, SUFFERING AND HUMILIATION PLAINTIFF SUFFERED AS A RESULT OF DEFENDANT GROSS NEGLIGENCE ACTION.
- (C) PUNITIVE DAMAGES PAYABLE TO PLAINTIFF IN AN AMOUNT TO PROPERLY PENALIZE DEFENDANT FOR THEIR MISCONDUCT AND TO DEFER SUCH WRONGDOING IN THE FUTURE.
- (D) FOR AN AWARD OF COSTS INCURRED IN THIS ACTION, PLUS REASONABLE FEES AS PROVIDED BY 42 U.S.C. A SECTION 1988 AND SECTION 706(k) OF TITLE VII.
- (E) THAT THE COURT GRANTS ANY OTHER EQUITABLE RELIEF DEEMED APPROPRIATE AND PROPER.
- (F) THAT THE COURT GRANT EQUAL FACILITIES IN THE AFRICAN-AMERICAN COMMUNITY AS A RESULT OF SYSTEMATIC RACIAL DISCRIMINATION AGAINST CITY'S AFRICAN-AMERICAN RESIDENTS, IN VIOLATION OF EQUAL PROTECTION CLAUSE.

RELIEF -4- ATTACHMENT #A

ECONOMIC DEVELOPMENT

- 1) PROVIDE GRANT WRITER, GRANTS, AND TECHNICAL ASSISTANCE DIRECTLY TO BLACKS.
- 2) HIRE BLACKS INTO MEANIFUL POSITIONS.
- 3) REFORM REGULATIONS: ELIMINATE RED TAPE AND MAKE PLAIN APPLICATIONS, RULES, AND STEPS TO OBTAIN LOANS AND GRANTS.
- 4) ASSIST THE BLACKS IMMEDIATELY IN DEVELOPING VENTURES, OBTAINING CONTRACTS, AND ENGAGING IN ECONOMICAL PROGRAMS IN THE CONFORTS OF THE MINORITY COMMUNITY.
- 5) COOPERATE WITH THE BLACK COMMUNITY AND SCHEDULE REGULAR MEETINGS, SIMINARS, AND TRAINING SESSIONS TO BRING BLACKS UP TO THE AMERICAN STANDARD ECONOMICALLY, EDUCATIONALLY, POLITICAL AND SOCIABLY.
- 6) REMOVE THE BARRIERS HOLDING MINORITIES DOWN THROUGH EXCLUSION.
- 7) SHARE THE MONEY WITH THE BLACKS AND GIVE TANGIBLE ASSISTANCE.

- 8) IMPLIMENT A PLAN AND MAKE UP FOR LEAVING BLACKS
OUT OF THE FOCUSED MISSION AGENDA.

- 9) DISCONTINUE THE VIOLATIONS OF THE PRIVACY ACT AND
CONFIDENTIAL RULES OF COMMON LAW PRIVACY OF
INDIVIDUAL PERSONS IN OBTAINING CREDIT REPORTS ON
CONSUMERS SEEKING BASIC NEEDS AS A PRACTICE NOW
IN PLACE IN CROCKETT. WE SHOULD NOT BE COMPELLED
TO GIVE PERSONAL INFORMATION TO PAY OR OBTAIN WATER,
GARBAGE COLLECTION AND SEWER TO VINDICTIVE PEOPLE.
WHY GIVE OUR SOCIAL SECURITY NUMBERS?

CITY OF CROCKETT ATTACHMENT #B

SET UP, FURNISH, AND SUPPLY A FIRE STATION WITH FULLY OPERATIONAL CREW AND ALL THAT IT TAKES IN TRUCKS, WATER SUPPLY, HOOKS, LADDERS, HOSES IN WEST CROCKETT WITH CREWS OF BLACKS, HISPANICS, AND OTHER MINORITIES WORKING WITH ANGLOS. SET UP AND MAINTAIN A BUDGET FOR STATION.

PAY PUNITIVE DAMAGES, HOUSE LOSS, ACTUAL DAMAGES, STRESS, AND MENTAL SUFFERING WHERE NEGLIGENCE CAN BE THE FACTOR FOR CAUSE.

COOPERATE WITH THE BLACK COMMUNITY IN THE NON-PROFIT ENDEAVORS TO OBTAIN BLOCK GRANTS AND/OR LOANS TO UPLIFT THE STANDARDS IN THE NEGLECTED BLACK COMMUNITY.

ALLOCATE FUNDS TO UNDERWRITE MATCH GRANTS IN ECONOMIC RECOVERY IN THE BLACK COMMUNITY OF CROCKETT FROM ANY LEGAL SOURCE. INCREASE MINORITY OWNED AND OPERATED BUSINESSES. IMMEDIATELY GIVE ASSISTANCE TO EXISTING BLACK OWNED BUSINESSES.

REMOVE THE 10% QUOTA IN CONTRACTS, CURFEW ORDINANCE, LOITERING ORDINANCE, REMOVE THE REMAINING AT-LARGE EARLY VOTING, AND REDUCE WATER RATES, CONNECTION FEES, DISCONTINUE POLICY TO OPPRESS.

CHANGE THE SURFACE OF STREETS TO CONCRETE IN BLACK
NEIGHBORHOODS AND PROVIDE SIDE WALKS. CONNECT WATER TO
DUMMY FIRE HYDRANTS. LET MINORITIES (ESPECIALLY
BLACKS) ASSIST IN DRAWING LINES FOR APPORTIONMENT OF
SINGLE MEMBER DISTRICTS TO ALIGN WITH CENSUS STATISTICS
FOR THE ONE MAN ONE VOTE CONCEPT.

Signed this 12 day of Sept, 2001.

Margaret Louise Burnett
(Signature of each plaintiff)

I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

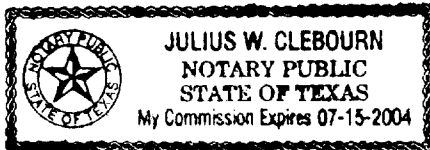
Executed on: Sept 12, 2001
(Date)

Margaret Louise Burnett
(Signature of each plaintiff)

BEFORE ME, THE UNDERSIGNED, A NOTARY PUBLIC IN THE STATE OF TEXAS, ON THIS DATE PERSONALLY APPEARED

MARGARET LOUISE BURNETT GIVEN UNDER MY HAND AND SEAL OF OFFICE THIS THE 12 DAY OF Sept, 2001.

Julius W. Clebourn
NOTARY PUBLIC IN AND FOR HOUSTON COUNTY, TEXAS



The civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleading or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THIS FORM.)

I (a) PLAINTIFFS

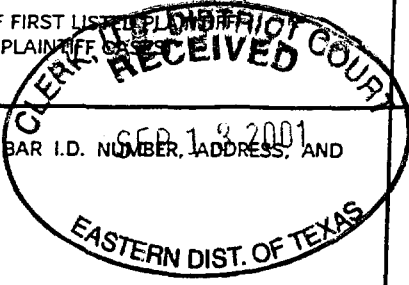
*Progressive Missionary Baptist Church
 Margaret Louise Burnett PR 02*

DEFENDANTS

*City of Crockett - Wayne Mask, Mayor
 City Administrator - Bill Horn
 Houston County Judge, Chris B.C. Von Doenhoff
 349 district attorney - Cindy Maria Barner*

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Houston
 (EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT Houston (IN U.S. PLAINTIFF CASES ONLY)
 NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED



(c) ATTORNEYS (FIRM NAME, BAR I.D. NUMBER, ADDRESS, AND TELEPHONE NUMBER)

ATTORNEYS (FIRM NAME, BAR I.D. NUMBER, ADDRESS, AND TELEPHONE NUMBER, IF KNOWN)

9:01cv173

II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)
 (PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

	PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Citizen of Another State	<input type="checkbox"/>	<input type="checkbox"/>
Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>
Incorporated or Principal Place of Business in This State	<input type="checkbox"/>	<input type="checkbox"/>
Incorporated and Principal Place of Business in Another State	<input type="checkbox"/>	<input type="checkbox"/>
Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>

IV. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS THIS IS A DIVERSITY SUIT)

Civil Rights

V. ORIGIN

(PLACE AN X IN ONE BOX ONLY)

- Original Proceeding
- Removed from State Court
- Remanded from Appellate Court
- Reinstated or Reopened
- Transferred from another district
- Multidistrict Litigation
- Appeal to District Judge from Magistrate Judge Judgment

VI. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER FRCP 23

DEMAND

\$ *Unspecified*

VII. RELATED OR PREVIOUSLY FILED CASE(S), IF ANY

(See Instructions):

Judge *John H. Hannah Jr*

Docket Number *9:01-CV-173*

Short Style _____

Current Status: _____

(Attach additional information, if necessary)

DATE _____

SIGNATURE OF ATTORNEY OF RECORD _____

(Revised 9/96)

CIVIL COVER SHEET

DEFENDANTS

HOUSTON COUNTY TREASURER - DIANNE RHONE

349TH DISTRICT CLERK - HONORABLE PAM PUGH

JUSTICE OF THE PEACE PRECINCT #2 - EVELYN FRANKS

THE STATE OF TEXAS

REFUGE OFFICER - DICK TEDFORD

CROCKETT CITY COUNCIL

HOUSTON COUNTY PROBATION OFFICER - WILLIAM "BILL" HYMAN

HOUSTON COUNTY SHERIFF - JIMBO RAINS