

FILED DEC 10 15 PM 1 45 USDCL

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA**

**THADDEUS D. SMITH, SR.****Plaintiff,****vs.****THE STATE OF ALABAMA BOARD OF  
PARDONS AND PAROLES****Defendants****CIVIL ACTION NO. 15-0625-CG-C****JURY TRIAL REQUESTED****COMPLAINT**

1. The Plaintiff resides at 10230 Sand Ridge Road, Chunchula, Al 36521
2. Name(s) of defendant(s) State of Alabama Board of Pardons and Paroles.
3. Location of principal office(s) of named defendant(s) State of Alabama Board of Pardons and Paroles 301 S. Ripley Street P.O. Box 302405 Montgomery, Al 36130-2405 (334) 353-7379.
4. Nature of business of defendant(s) Pardons and Paroles.
5. Approximate number of individuals employed by defendant(s) State of Alabama Board of Pardons and Paroles -75-100.
6. The acts complained in this suit:

The Plaintiff is alleging the State of Alabama Board of Pardons and Paroles violated said Plaintiff's (Thaddeus D. Smith Sr.) Civil and Constitutional rights as they sought to deny the Plaintiff voting rights restoration and a pardon from the State of Alabama.

The plaintiff will show eligibility to have his voting rights restored by the State of Alabama's own court documents showing there were no monies owed at the time in which the Plaintiff reached his End of Sentence with the Board of Pardons and Paroles. The Plaintiff will also show that because his debt to society has been paid in full along with any restitution owed, the Plaintiff

is an active member of society. The Plaintiff has worked consistently meeting financial obligations, support a family, and paying taxes as any law-abiding member of society and has become a home-owner with strong ties to the community.

The records will show that the Plaintiff was officially cleared by the office of Pardon and Parole by Mr. White with the Mobile office prior to completion of sentence in September of 2009.

The Plaintiff believes his vote should have been counted in the 2012 Presidential election as well as any state and local elections as owed to either party the Plaintiff decided. The Plaintiff believes that the denial of restoration rights by the State of Alabama Pardons and Paroles to vote was politically motivated and precipitated the denial of the Plaintiff's pardon as requested. The Plaintiff is including four (4) documents as to the request for rights and receipt for zero balance and the denial letter and letter to Parole supervisor Mr. white for inquiry into the matter.

Therefore, I am bringing this action pursuant to

*The Fifteenth Amendment &  
Voting Rights Act of 1965 Section 2+4  
(42 U.S.C. 1973)*

The Plaintiff seeks justice and to be made whole from this matter through the courts by seeking the sum of Two million dollars, any other relief that may be appropriate, including injunctive orders, damages, costs and attorney's fees.

Date: December 08, 2015

*Shadell D. Smith Sr*

Plaintiff (Pro-Se)  
10230 Sand Ridge Road  
Chunchula, AL 36521  
(251) 303-3166 (for messages)

To the State of Alabama Probation and Parole, Montgomery Office

Attention to Mrs. Quinetta Fendson or Demetria Lewis

This letter is to address the response of Thaddeus D. Smith Sr. restoration of voter registration rights as it was brought to my attention that there was still a fine for the amount of \$48.00 that existed and was the reason for the delay in my application to the restoration of my voter's rights and request for pardon. However, this has been rectified as my previous parole officer was able to track the matter and found that the fine had been paid in civil court he then instructed me to obtain a receipt from the court house stating this fact that I am cleared and have no past balance due and this is the paper attached with this fax. I hope that this clears any further delay in this matter as I anticipate being able to register as a voter very soon once this is corrected in your system. If there is any further assistance that you need from myself please do not hesitate to contact me, 251-508-8737 after 3:30 pm or between 12:00 pm and 12:25 which is my lunch time or you may leave a message.

Thank you for your prompt assistance in this matter,

Thaddeus D. Smith Sr.  
1601 Neshota Drive # 38  
Mobile, Al 36605  
May 24, 2012

FE61 FINANCIAL HISTORY BROWSE SITE: 02 MOBILE COUNTY OFC: 4  
CASE: DC 1994 000178 00 PAYOR: D 001 SMITH THAD TRAN DATE: PC PRNTR: N  
SHOW ONLY: CHECKS: RCPTS: FEE TRANS: BATCH: ACCT: OPR:

TRANS	DATE	TRANSACTION	DISB ACCT PR	TRANS BATCH	CHECK#/ RECEIPT#	AMOUNT	MON FEE TYP	SEQ	OPE
05232012		FEE DELETED	SF30 11	2012169		\$16.00	N O	001	KIE
05232012		FEE DELETED	SF80 15	2012169		\$32.00	N O	002	KIE

----- BALANCE DUE: \$0.00  
\*\*\* THERE ARE NO MORE HISTORY RECORDS ON-FILE FOR YOUR REQUEST \*\*\*  
01=MNU 02=FEE 03=NDX 04=ACB 05=CLR 06=OCS 07=RPT 08=ENF 09=JOU 10=FEE 11=FWD  
12=CSE 13=SNT 14=ACT 15=DSB 16=CHK 17=RCP 18=PRF 19=PRT 20=OFF 22=PRT 24=HLP

Receipt as noted  
paid in full zero  
balance.



**STATE OF ALABAMA  
BOARD OF PARDONS AND PAROLES**

301 S. Ripley Street  
P.O. Box 302405  
Montgomery, Alabama 36130-2405  
(334)353-7379



WILLIAM WYNNE  
Chairman of the Board

June 18, 2012

CYNTHIA S. DILLARD  
Executive Director

ROBERT P. LONGSHORE  
Associate Member

EDDIE COOK, JR.  
Assistant Executive Director

CLIFF WALKER  
Associate Member

THADDEUS DEMETRIUS SMITH  
1601 NESHOTA DRIVE #38  
MOBILE, AL 36605

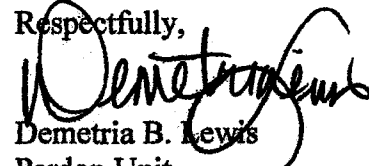
MR. SMITH:

Our records indicate that you have made application with the Alabama Board of Pardons and Paroles to have your "Voter Rights" restored after being convicted of a felony. **In order to be eligible to have your rights restored, you must meet certain requirements. You must be off probation/parole. You must have paid off all of your court fees, restitution and probation fees.** Your crime of conviction can not include any sexual offense or any other crime prohibited under the new legislature law Section "15-22-36.1."

After an investigation has been done in your case, it appears you are not eligible to have your "Voter Rights" restored. It was discovered that you owe \$792.00 in unpaid court ordered monies. Once this matter has been resolved, your voting rights may be restored. If you have questions, please contact me at (334)353-7379.

enclosure

Respectfully,

  
Demetria B. Lewis  
Pardon Unit

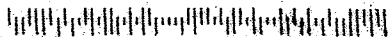
cc: pardon unit file

To: Probation and Parole Officer Attn: Mr. White

This letter is to address the matter that we previously discussed in reference to a false balance that was left on my record in which when you made mention of this it was determined that I did not leave with an outstanding balance and that it would be cleared up in the system. It has come to my attention recently that this outstanding balance still exist and is being used against me in the determination towards the application to which I applied to have my voters rights restored and a pardon. If you would please look into this matter and determine what action needs to be taken to rectify this era and fax me a letter in return for the purpose of sending it to the parole board it would be greatly appreciated as I was released and paid in full before and on the date of my parole ended. This is very important to me and my family as I have worked to remain an active and a productive member of society and ready to vote also I am embarking on becoming a family home owner, so this matter places high importance with me. If you have any questions please do not hesitate to call me @ 251-508-8737 my break is from 9am-9:15am and lunch from 12pm- 12:30pm.

Thank you

Thaddeus D. Smith  
4-03-2012



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U.S. POSTAGE  
PAID  
CITRONELLE, AL  
36522  
DEC 08, 15  
AMOUNT  
**\$2.08**  
R2305E124445-10

United States District Court  
Southern District of Alabama  
CLERK

113 ST. Joseph Street  
Mobile, Alabama 36602

Official Business



