

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

PAMELA MOSES

Plaintiff,

v.

Docket No.: _____
Jury Demands

**STATE OF TENNESSEE; STEVE MULROY,
In his individual and official capacity as the
District Attorney General; AMY WEIRICH,
In her individual capacity**

Defendants.

COMPLAINT

COMES NOW, the Plaintiff, Pamela Moses by and through counsel, and files this Complaint. This action arises from acts of individual and systemic misconduct by the State of Tennessee District Attorney General's Office, District Attorney, Steve Mulroy and its supervisors and officers, including but not limited to former District Attorney General Amy Weirich, which proximately caused the injuries to Plaintiff. This action arises under federal law 42 U.S.C. § 1983 for false arrest and/or reckless and malicious prosecution in violation of the Fourth and Fourteenth Amendment of the United States Constitution In support of this complaint, Plaintiff states as follows:

(I)
INTRODUCTION

1. This action is brought pursuant to 42 U.S.C. § 1983 for false arrest and/or reckless and malicious prosecution in violation of the Fourth and Fourteenth Amendment of the United States Constitution.

2. The Plaintiff respectfully reserves the right to further amend this pleading as future discovery might dictate.

(II)
PARTIES

3. The Plaintiff, PAMELA MOSES (hereinafter “Plaintiff”), an African American female, is a United States citizen and a resident of Memphis, Tennessee.

(III)
JURISDICTION AND VENUE

4. This Court has original jurisdiction over this matter pursuant to 42 U.S.C. § 1983, and this action is brought pursuant to 42 U.S.C. § 1983, and the Fourth and Fourteenth amendments to the United States Constitution. This Court also has concurrent jurisdiction for any action arising out of the Tennessee’s Government Tort Liability Act, the Common Law of Tennessee, and other applicable laws.
5. Venue is proper in the Western District of Tennessee pursuant to 28 U.S.C. § 1391(b) as all Defendants reside in this district and all relevant events too place in this district.

(IV)
FACTS

6. Plaintiff is an African American woman born on October 5, 1977.
7. Plaintiff is the founder and CEO of Black Lives Matter – Memphis Chapter (BLMM).
8. Plaintiff is a graduate of the University of Tennessee at Knoxville, and received a Master’s degree in Intercultural Studies from Union University.
9. Plaintiff is a mother and human rights activist who advocates for racial inequality and promotes equity and historical neighborhood preservation for her community.
10. Through Plaintiff’s activism she is a powerful voice for her community seeking to dismantle systemic corruption and racism in Memphis, Tennessee.

11. Plaintiff is also a community organizer who promotes non-violent social justice, she currently serves as the District 7 Shelby County Democratic Executive Committee Chairwoman, and North Memphis Ambassador of the United States Human Rights Network.
12. Plaintiff has developed several BLMM initiatives for change, including the #DONTTOUCHMYVOTE campaign aimed at overcoming legal barriers at the state and local levels that prevent African Americans from exercising their right to vote. This campaign gave individuals a chance to reach out to family and friends to educate each other on the existing voting restoration process and promote the importance of the Black vote.
13. On July 31, 2000, Plaintiff was convicted of aggravated assault, a class C felony in Knox County, Tennessee. As a result, Plaintiff received a three-year sentence.
14. Due to Plaintiff's conviction, she was found infamous and lost her rights of citizenship, including her right to vote.
15. Pursuant to T.C.A. § 40-20-114, a person convicted on a loses the right to run for office in addition to their voting rights.
16. On November 4, 2021, Plaintiff was found guilty by a jury for a Class D felony of making or consenting to false entries on official registration or election documents in violation of T.C.A. § 2-19-109 after she was erroneously provided with a certificate by a Shelby County corrections department official that her probation period had ended. Plaintiff, at the time, was a 44 year old mother of two and community activist. Plaintiff denied all charges and drew national attention to her case.

17. On January 31, 2022, in the Criminal Court of Shelby County, Tennessee, for the Thirteenth Judicial District at Memphis Division IX, entered a written Sentencing Order sentencing Plaintiff to six years in prison.
18. At the time of the filing of this Complaint, Plaintiff is still unable to vote, even though both the Department of Corrections and Shelby County Election Commission have acknowledged that they calculated the sentencing expiration incorrectly.
19. In 2017, Plaintiff led an effort that called for the resignation of District Attorney Amy Weirich, who was the prosecutor in Plaintiff's 2019 criminal case.
20. In 2019, the stewards of the court approved and completed Plaintiff's certificate of rights restoration, certifying that her probation had ended and reinstating her full voting privileges. Plaintiff then applied for voter registration with the Shelby County Elections Committee, which application was approved.
21. Following the direction of the stewards of the court and the Shelby County Elections Committee Plaintiff rightfully believed that her voting rights were properly restored.
22. At no time did Plaintiff falsify any documents related to the restoration of her voting rights. Rather, Plaintiff followed the instructions of the stewards of the court.
23. Both the Shelby County Criminal Court and the State Probation office recognized and signed the certificate of restoration of voting rights form.
24. Plaintiff was overjoyed to be able to vote again in the upcoming elections.
25. Despite Plaintiff's representations and the actions of both the Shelby County Criminal Court and the State Probation Office, Defendants nevertheless alleged that Plaintiff had unlawfully convinced the State Probation office that her rights were restored.

26. Defendants wrongfully accused Plaintiff of fraudulently obtaining the certification of restoration of voting rights.
27. However, Plaintiff played no role in obtaining the certificate of restoration of her voting rights.
28. Plaintiff is informed and believes that the Manager Billington, steward of the court, made a mistake in issuing her a certificate of restoration of her voting rights.
29. Thereafter, Plaintiff was criminalized, demoralized, and punished for the errors of the state itself.
30. Plaintiff did not forge the certificate of restoration of voting rights.
31. Defendants knew that the certificate of restoration of voting rights was a result of the Shelby County Election Commission's mistake.
32. As a result, Plaintiff was wrongfully convicted, and her life was placed on pause while she fought to prove she had no involvement in the mistakes of the Shelby County Election Commission.
33. On February 25, 2022, Plaintiff's counsel filed a Second Amended Motion for Judgment of Acquittal or in the Alternative Motion for New Trial in Plaintiff's criminal case *State of Tennessee v. Pamela Moses*, Case No. 19-06482. Plaintiff's motion alleged a Brady violation because the State failed to provide the defense an email from Joe S. Williams with regard to an internal investigation by the Department of Corrections of the incident for which Ms. Moses was convicted. The Court also ruled that "Said document was discoverable by the defense under Tenn.R.Crim.P. 16(a)(1)(F) as well as under the dictates of *Brady v. Maryland*, 373 U.S. 83 (1963)." Furthermore, although the Assistant District Attorney who handled the case for the State indicated that he had not seen the

documents, *Brady* and Rule 16 are applicable regardless of the good faith of the prosecution. Additionally, under *Brady* and Rule 16, the prosecution is responsible for knowing what is contained in all state agency files and is held strictly liable for failure to disclose even when it has no actual knowledge of the existence of the information.

34. On April 22, 2022, Plaintiff finally received the justice she deserved when Defendants dismissed Plaintiff's illegal registration charges.

35. Plaintiff suffered severe emotional distress, anxiety, mental anguish, embarrassment, and harassment as a result of Defendants' actions.

(V)
CAUSES OF ACTION

36. Plaintiff reasserts and incorporates all previous paragraphs into each subsequent Count.

37. Each enumerated count also incorporates all allegations of all other counts.

COUNT ONE:

Violation of U.S.C. § 1983 for Reckless and Malicious Prosecution against Amy Weirich in her Individual Capacity

38. Plaintiff reiterates and incorporates the previous paragraphs as if fully set forth in this Count.

39. In the present case, District Attorney General, Amy Weirich acting under color of state law, aided in the decision to charge and prosecute Plaintiff for a Class D felony of making or consenting to false entries on official registration or election documents in violation of T.C.A. § 2-19-109.

40. Plaintiff is informed and believes that Defendant Amy Weirich knowingly withheld evidence which contains information that was not addressed during trial and that would have exonerated Plaintiff.

41. On September 5, 2019, an email was written by a senior corrections department official, Mr. Joe Shannon Williams, after an internal investigation into the matter. This email acknowledged that it was a mistake of Manager Billington. Manager Billington was the steward who signed off on Plaintiff's voter registration application in 2019, certifying that her probation had ended and her voting privileges were reinstated.
42. Defendant Amy Weirich, continued to prosecute Plaintiff for a Class D felony of making or consenting to false entries on official registration or election documents in violation of T.C.A. § 2-19-109.
43. Defendant Amy Weirich intentionally and maliciously made the decision to continue to prosecute Plaintiff after September 5, 2019, with information that Plaintiff did not falsify any voting records or documents, but that there was a mistake on the part of the steward of the Court and Manager Billington.
44. The above referenced decision making shows that Defendant Amy Weirich failed to disclose pertinent information and acted with a reckless disregard which led to the unlawful prosecution and deprivation of liberty of Plaintiff.
45. The charges were dismissed against Plaintiff. On April 22, 2022, the Office of the District Attorney General issued a letter indicating the Plaintiff will not be tried a second time on the felon charge of illegally registering to vote.
46. The conduct and action of Defendant Amy Weirich, in her individual capacity, constitutes a reckless and malicious prosecution which ultimately violated Plaintiff's rights under the United States Constitution.

47. As a result, Plaintiff suffered mental anguish, emotional distress, stress, anxiety, embarrassment, humiliation and demoralization. Plaintiff also spent a total of 82 days in custody.

COUNT TWO:

Violation of 42 U.S.C. § 1983 for Reckless and Malicious Prosecution Against the State of Tennessee for its Customs, Policies, and Practices

48. Plaintiff reiterates and incorporates the previous paragraphs as if fully set forth in this Count.

49. As alleged above, Defendant Amy Weirich violated the rights of Plaintiff secured by the Fourth and Fourteenth Amendment of the U.S. Constitution by recklessly and maliciously prosecuting Plaintiff, despite clear evidence that Plaintiff did not fraudulently falsified voting registration documents. Specifically, Defendant State of Tennessee, enacted policies and customs that were deliberately indifferent to and therefore caused the violation of Plaintiff's constitutional rights.

50. Defendant State of Tennessee, acting by and through its policymakers, officers, and agents with deliberate indifference, implemented customs and policies, and authorized, approved or knowingly acquiesced in the unconstitutional conduct of Defendant Amy Weirich who violated the above-described constitutional rights of Plaintiff. These policies and customs directly and proximately caused the above referenced constitutional rights violation resulting in Plaintiff's reckless and malicious prosecution.

51. Defendant State of Tennessee, acting by and through their policymakers, officers, and agents with deliberate indifference, failed to properly hire and train its agents and employees with respect to their responsibilities in ensuring that they do not recklessly and

maliciously prosecute individuals, which directly and proximately caused the above-described constitutional rights violations.

52. By failing to properly hire and train its agents and employees with respect to their responsibilities in ensuring that they do not recklessly and maliciously prosecute individuals, by enforcing unwritten policies or customs of reckless and malicious prosecution with deliberate indifference to the violation of an individual's constitutional rights, and by the implementation and enforcement of municipal customs or policies, the Defendant State of Tennessee acted as the moving force behind the misconduct of the individual Defendant in this matter and is ultimately responsible for the violation of Plaintiff's rights under the United States Constitution.

COUNT THREE:

Violation of *Bivens v. Six Unknown Named Agents*, 430 U.S. 388 (1971) for Reckless and Malicious Prosecution Against the State of Tennessee for its Customs, Policies, and Practices

53. Plaintiff reiterates and incorporates the previous paragraphs as if fully set forth in this Count.

54. As alleged above, Plaintiff was deprived of her rights secured by the Fourth and Fourteenth Amendment of the U.S. Constitution when Defendant State of Tennessee and Defendant Amy Weirich recklessly and maliciously prosecuted Plaintiff, despite clear evidence that Plaintiff did not fraudulently falsify voting registration documents. Specifically, Defendant State of Tennessee engaged in at least one *Brady* violation in failing to disclose an email within its possession and control from Joe S. Williams with regard to an internal investigation by the Department of Corrections of the incident for which Ms. Moses was convicted.

55. Defendant State of Tennessee was thereby responsible for knowing what is contained in all state agency files and is held strictly liable for its failure to disclose even when it has no actual knowledge of the existence of the information.

56. The deprivation of Plaintiff's rights secured under the Fourth and Fourteenth Amendment of the U.S. Constitution was caused by the State of Tennessee acting under color of law when it failed to either locate and disclose the information and email to Plaintiff or her counsel during the pendency of her criminal trial.

57. As a result, Plaintiff suffered mental anguish, emotional distress, stress, anxiety, embarrassment, humiliation and demoralization. Plaintiff also spent a total of 82 days in custody.

VI. DAMAGES

58. Plaintiff has suffered damages including, but not limited to, compensatory damages for financial, physical, and emotional harms proximately caused by the wrongful conduct of Defendants.

59. Plaintiff suffered loss of job/wages, impairment of reputation, personal humiliation, mental anguish, and suffering direly and proximately caused by the Defendants' conduct.

60. In the preceding criminal matter, Plaintiff spent 82 days in custody after being recklessly and maliciously prosecuted. Furthermore, Plaintiff's reckless and malicious prosecution lasted for about five months. During this time, Plaintiff suffered great injury, including loss of her liberty while being falsely detained, the loss of her employment and wages, great mental anguish and emotional distress, personal humiliation, and damage to her reputation.

61. Plaintiff's harm and suffering was directly and proximately caused by the Defendants' conduct. For these reasons, Plaintiff submits that compensatory and punitive damages are appropriate in this matter.

VII. PRAYERS FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, the Plaintiff respectfully demands as follows:

1. That process issues to the Defendants and that they be required to answer in the time allowed by law.
2. That judgment be rendered in favor of the Plaintiff and against the Defendants, jointly and severally, on all causes of action asserted herein.
3. That Plaintiff be awarded damages to which it may appear she is entitled by the proof submitted in this cause for physical and mental pain and suffering, both past and future, in an amount to be determined by the jury.
4. That Plaintiff be awarded both compensatory and punitive damages against the Defendants.
5. That Plaintiff be awarded reasonable expenses incurred in this litigation, including reasonable attorney and expert fees, pursuant to 42 U.S.C. § 1988(b) and (c) and any other applicable state or federal law.
6. That the Plaintiff receive any further and general relief to which the justice of this cause may require.
7. Pre- and post-judgment interest as permitted by law.
8. A jury for the trial of this matter for all issues so triable.

Respectfully submitted,

By: /s/ Carlos E. Moore
CARLOS E. MOORE, TN# 028649

Attorney for Plaintiff

OF COUNSEL:

THE COCHRAN FIRM – Mississippi Delta

306 Branscome Drive

P.O. Box 1487

Grenada, MS 38902

(662) 227-9940 (Telephone)

(662) 227-9941 (Fax)

Email: cmoore@cochranfirm.com

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Tennessee

PAMELA MOSES

Plaintiff(s)

v.

STATE OF TENNESSEE; STEVE MULROY, in his individual and official capacity as the District Attorney General; AMY WEIRICH, in her individual capacity

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* STATE OF TENNESSEE
c/o Jonathan Skrmetti, Attorney General
500 Charlotte Avenue
Nashville, TN 37219

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

Carlos E. Moore, Esq., THE COCHRAN FIRM - MS DELTA; 306 Branscome Drive, P. O. Box 1487, Grenada, MS 38902-1487

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* STATE OF TN; c/o Jonathan Skrmetti, Attorney General
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Tennessee

PAMELA MOSES

Plaintiff(s)

v.

STATE OF TENNESSEE; STEVE MULROY, in his individual and official capacity as the District Attorney General; AMY WEIRICH, in her individual capacity

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* STEVE MULROY, Shelby Co. District Attorney General
 201 Poplar Avenue, 11th Floor
 Memphis, TN 38103

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are: Carlos E. Moore, Esq., THE COCHRAN FIRM - MS DELTA; 306 Branscome Drive, P. O. Box 1487, Grenada, MS 38902-1487

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* STEVE MULROY, Shelby Co. District Attorney General
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Tennessee



PAMELA MOSES

Plaintiff(s)

v.

STATE OF TENNESSEE; STEVE MULROY, in his individual and official capacity as the District Attorney General; AMY WEIRICH, in her individual capacity

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) AMY WEIRICH, Former Shelby Co. District Attorney General
121 North Main Street
Ripley, TN 38063

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Carlos E. Moore, Esq., THE COCHRAN FIRM - MS DELTA; 306 Branscome Drive, P. O. Box 1487, Grenada, MS 38902-1487

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* AMY WEIRICH, Former Shelby Co. District Attorney General was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____ , a person of suitable age and discretion who resides there, on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is designated by law to accept service of process on behalf of *(name of organization)* _____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

JS 44 (Rev. 02/19)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

PAMELA MOSES

(b) County of Residence of First Listed Plaintiff Shelby
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Carlos E. Moore, Esq., The Cochran Firm - MS Delta; P. O. Box 1487, Grenada, MS 38902-1487

DEFENDANTS

STATE OF TENNESSEE; STEVE MULROY, in his individual and official capacity as the District Attorney General; AMY WEIRICH, et al.

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

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

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation - Transfer
- 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. §1983

Brief description of cause:
Violatin of Constitutional Rights

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE 10/21/22

SIGNATURE OF ATTORNEY OF RECORD

Carlos E. Moore

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____