# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In the Matter of:	} }
	CIVIL ACTION
TERRY LEE HINDS,	} FILE NUMBER: <b>4:17 – CV – 750 JMB</b>
Pro se,	}
Plaintiff,	}
	}
-Vs-	}
	}
"UNITED STATES" GOVERNMENT,	}
	}
Defendants.	}

# SECOND NOTICE OF A SHORT AND PLAIN STATEMENT OF THE CLAIM SHOWING THE PLAINTIFF IS ENTITLED TO RELIEF UNDER THE FIRST AMENDMENT AND, IN THE ASSESSMENT OF TRUTH FOR A

fact-based pleading and Rule 8 entitlement; giving rise to plausibility of "entitlement to relief"

## TO THE HONORABLE JUDGE OF SAID COURT AND DEFENDANTS:

Please take notice that the undersigned, Plaintiff TERRY LEE HINDS, ("Plaintiff") appearing *Pro se* in support of his civil action for rights, privileges, or immunities secured by the U.S. Constitution and the Rule of Law, thereby to secure, protect and defend Plaintiff's free exercise of unalienable rights to life, liberty and pursuit of happiness, hereby declares and submits the following notice and pursuant to Plaintiff's constitutional protected free exercise rights to petition the U.S. government and to protest U.S. government activities through this civil action and its pleadings, and in so doing providing formal Notice to all interested parties and the Court:

## PROCEDURAL POSTURE

1). Plaintiff *lawfully* filed on February 16, 2017 with the Court an [ORIGINAL VERIFIED COMPLAINT FOR DECLARATORY JUDGEMENT, INJUNCTIVE AND OTHER APPROPRIATE RELIEF IN THIS PETITION FOR QUINTESSENTIAL RIGHTS OF THE FIRST AMENDMENT, presented with a 16 page Second Notice of Plain and Short statements - Page 1 of 15 pages

Brief in Support, with an Exhibit List consisting of 26 pages instituting 510 Exhibits attached thereto; a case & its controversies listed on 549 pages] ("[OVC/Petition]"). Plaintiff is *engaged in peaceful expressive activity* pursuant to *fundamental free exercise rights* of the First Amendment.

- 2). FOR THE RECORD, Plaintiff's suit is not *groundless* or *meritless* within a *system of justice*. However, at present this case and its controversies are being adjudicated without the verbal vanguard of due process striking [OVC/Petition] without notice, *self-evident* when the Court issued Memorandum and Order dated 23<sup>rd</sup> day of February, 2017 (Doc. No. 8). A review of this *instant* Order *to strike the entire breath and merits* of [OVC/Petition] defeats an adversarial *system of justice* and does not advance a defining and distinctive feature of the United States' legal system.
- 3). FOR THE RECORD, Plaintiff's case, its controversies and [OVC/Petition] involves, in part, Plaintiff's *free exercise rights of protected speech of religious beliefs* and pure speech of [Sacred Honor] as affirmed, applied, expressed and incorporated in an [OVC/Petition]. Plaintiff maintains his [OVC/Petition] is construed as to do substantial justice with *fundamental free exercise principles* guaranteed by the First Amendment and protected by this Nation's *rule of law*.
- 4). The preceding [Court's Presiding Judge, the Honorable John M. Bodenhausen] ("[Judge]") made a *review, finding, and Order* (Doc. No. 8) thereby imposed unconstitutional *viewpoint-based restrictions* on Plaintiff's free, pure, or [Protected Speech]. The Order engaged in viewpoint-driven conduct & regulating speech based on its content against Plaintiff's *pure* and [Protected Speech] content within [OVC/Petition]. This was the result when attempting to *redress grievances* with Defendants and to protest unconstitutional activities. "*The First Amendment, our precedent makes plain, disfavors viewpoint-based discrimination.*" See Rosenberger v. Rector & Visitors of Univ. of Va., 515 U. S. 819, 828 (1995) quoting Wood v. Moss, 572 U.S. \_\_\_\_ (2014).
  - 5). The Court & [Judge] Ordered, in part: "that Plaintiff shall file an Amended Complaint

in conformity with the requirements of Rule 8 no later than March 20, 2017." This Order infringes on free, pure, or protected speech, *as well as*, the [Protected Speech] of the Plaintiff. This Order manifesting stiff encroachments on *fundamental free exercise principles* of the First Amendment, when Orders forces Plaintiff *to deliver a different message under exactly the same circumstances*.

- 6). Pursuant to Local Rule 2.08, and Plaintiff's anxieties about a fair hearing and due process requested and received a random reassignment of this case to a District Judge. (Doc. No. 16). "IT IS HEREBY ORDERED that the above styled cause is randomly reassigned from Magistrate Judge H. Bodenhausen to District Judge John A. Ross." (hereinafter "[Judge Ross]").
- 7). The Court issued Memorandum and Order dated 10<sup>th</sup> day of March, 2017 (Doc. No. 18). [Judge Ross] declared upon *further review* of a "547-page Complaint, with 4,451 paragraphs, the Court finds it clearly does not comply with Rule 8", which requires a "short and plain statement of the claim(s)" and that "[e]ach averment of a pleading shall be simple, concise, and direct."
- 8). FOR THE RECORD, and for unknown reason(s) [Judge Ross] made no reference that Plaintiff's [OVC/Petition] had established *seven claims for relief* with *seven causes of action* involving the U.S. Constitution, *germane* U.S. Supreme Court doctrines, *establishment challenges* and *free exercise clause* violations of the First Amendment. An act of *legal prejudice* to Plaintiff.
- 9). [Judge Ross] "ORDERED that Plaintiff shall file an amended complaint in *conformity* with the *requirements* of Rule 8 no later than Friday, May 19, 2017. Failure to do so may result in dismissal of this action." (Doc. No. 18). Furthermore, [Judge Ross] *instant Order* (Doc. No. 29) decrees: "Even if the Court were to liberally construe Plaintiff's Notice as an amended complaint, the Court would nevertheless finds that the Notice does not comply with the Court's previous Orders (see Doc. No. 8, 18)." <u>However</u>, this Notice and others filed seeks *conformity* with *the law*.
  - 10). FOR THE RECORD, the Court's Orders ("[Doc. Nos. 8, 18 & 29]") ("[ORDERS]")

seeks one sole aim, Plaintiff's case, its claims, its causes of action and the [OVC/Petition] is to be dismissed for failure to comply with a trial court's order. This conclusion is hardly a novel one. Plaintiff's *liberty interests* or his *property interests* (assets of intellectual tithing, sacred property of conscience, the [OVC/Petition] as an intellectual property, the possession of time and labor, etc.) has no value to this Court. A clear case in the *breath and merits* existing as *complex litigation*.

- 11). FOR THE RECORD, any court that would allow, support or continue to advance this case and its controversies listed as: "Applicable Law: 42 U.S.C. § 1981" and "Cause: 42 U.S.C. § 1981 Civil Rights" and as "Nature of Suit: 440 Civil Rights: Other" including but not limited to other *surreal acts* or a *doctrine of legalisms* is not concern with the Due Process Clauses, or U.S. Supreme Court Doctrines or Plaintiff's *free exercise rights* or his establishment clause challenges.
- 12). FOR THE RECORD, in the case of Logan v. Zimmerman Brush Co., 455 U.S. 422 (1982), the Court held *a constitutional limitation on the lower courts to dismiss an action:*

The Court traditionally has held that the Due Process Clauses protect civil litigants who seek recourse in the courts, either as defendants hoping to protect their property or as plaintiffs attempting to redress grievances. In *Societe Internationale v. Rogers*, 357 U. S. 197 (1958), for example -- where a plaintiff's claim had been dismissed for failure to comply with a trial court's order -- the Court read the "property" component of the Fifth Amendment's Due Process Clause to impose

"constitutional limitations upon the power of courts, even in aid of their own valid processes, to dismiss an action without affording a party the opportunity for a hearing on the merits of his cause."

*Id.* at 357 U. S. 209. *See also Hammond Packing Co. v. Arkansas*, 212 U. S. 322, 212 U. S. 349-351 (1909) (power to enter default judgment); *Hovey v. Elliott*, 167 U. S. 409 (1897) (same); *Windsor v. McVeigh*, 93 U. S. 274 (1876) (same). *Cf. Wolff v. McDonnell*, 418 U. S. 539, 418 U. S. 558 (1974).

13). FOR THE RECORD, A judge's sua sponte decisionmaking, and/or with the Court acting on its own initiative, on the basis of formalities of Plaintiff's [OVC/Petition] and/or "A document filed pro se is 'to be liberally construed,' Estelle, 429 U.S., at 106, 97 S.Ct. 285, and 'a pro se complaint, however inartfully pleaded, must be held to less stringent standards than formal

pleadings drafted by lawyers,' *ibid*. (internal quotation marks omitted). Cf. Fed. Rule Civ. Proc. 8(f) ("All pleadings shall be so construed as to do substantial justice")" under the Federal Rules of Procedures ("Fed. R. Civ. P.") *present or past.* See Erickson v. Pardus, 127 S.Ct. 2197 (2007).

- 14). FOR THE RECORD, the Defendants have not currently filed any motion(s) to dismiss the [OVC/Petition], raised any defenses, admissions or denials, or plead affirmative defenses, including making any claims or exercise certain rights under Fed. R. Civ. P. Rule 8.
- 15). **IN THE RECORD**, as to Plaintiff's *free exercise right* to *petition constitutional* claims seeking court sanctioned and statutory relief pleaded SHORT AND PLAIN STATEMENTS OF THE CLAIM in an [OVC/Petition] as set forth herein:

#### SECOND CLAIM FOR RELIEF

Violation of the Free Exercise Clause in the Right of Free & [Protected Speech], *inter alia* Violation of the Due Process Clause of the Fifth Amendment of the U.S. Constitution *Declaratory Judgement, Injunctive and other Appropriate Relief* 

- ¶ 4374. Plaintiff hereby re-allege and incorporate by reference each and every allegation, fact or averment in this [OVC], as though fully set forth herein.
- ¶ 4375. The Plaintiff wishes to engage in activities and conduct protected under the First Amendment to the U.S. Constitution and with the established right of due process of law.
- ¶ 4376. By Defendants' law, conduct and activity alleged *supra*; it is evident Defendants have violated, and are continuing to violate, Plaintiff's right of free and [Protected Speech], Expression or Discussion of his [CLP] as an Artful Blend for his life, liberty and pursuit of happiness, conduct and activities guaranteed or protected under the Free Exercise Clause of the First Amendment to the U.S. Constitution.
- ¶ 4377. By Defendants' law, conduct and activity alleged *supra*; it is evident Defendants have violated, and are continuing to violate, Plaintiff's right of free and [Protected Speech], Expression

- or Discussion of his [CLP] designed as an Artful Blend for life, liberty and pursuit of happiness; all such activities protected by Due Process of Fifth Amendment: "No person shall...be deprived of life, liberty, or property, without due process of law..."
- ¶ 4378. By Defendants' law, conduct and activity alleged *supra*; it is evident [THE CODE] deprives Plaintiff of liberty and property interests without due process of law and is void for vagueness and unconstitutionally overbroad in violation of established Court Doctrines.
- ¶ 4379. By Defendants' law, conduct and activity alleged *supra*; it is evident Defendant has violated, and is continuing to violate, Plaintiff's rights, privileges or immunities as well as Establishment Clause of the First Amendment to the U.S. Constitution.
- ¶ 4380. The laws, customs, practices, and policies established by Defendants are the cause in fact of the constitutional violations or the redressable injury by a message of endorsement.
- ¶ 4381. Unless restrained by this Court, Defendants will continue to subject Plaintiff to these unconstitutional laws, customs, policies, and practices, causing Plaintiff irreparable harm by denying him fundamental constitutional rights.
- ¶ 4382. Plaintiff has a right to have this Court declare his free exercise rights under the First Amendment as those rights are restricted and infringed by Defendants' law, conduct and activity alleged *supra*.
- ¶ 4383. Plaintiff is uncertain as to his declare rights and legal remedies promulgated by Plaintiff's [Q.U.E.S.T.] that manifested a Quintessential Right as to [Protected Speech], an unenumerated right of which warrants enforcement or judgment by this court.
- ¶ 4384. An actual and substantial controversy exists between Plaintiff and Defendants as to their respective legal rights and duties as set forth in Count II and Plaintiff's Second Claim for Relief, thereby warrants Declaratory Judgement, Injunctive and other Appropriate Relief.

- 16). Federal Rule of Civil Procedure 8(a)(2) requires only "a short and plain statement of the claim showing that the pleader is entitled to relief." Specific facts are not necessary; the statement need only "`give the defendant fair notice of what the . . . claim is and the grounds upon which it rests." Bell Atlantic Corp. v. Twombly, 550 U.S. \_\_\_\_, \_\_\_\_, 127 S.Ct. 1955, 167 L.Ed.2d 929 (2007) (quoting Conley v. Gibson, 355 U.S. 41, 47, 78 S.Ct. 99, 2 L.Ed.2d 80 (1957)).
- 17). The Court has repeatedly confirmed: "that due process is flexible and calls for such procedural protections as the particular situation demands." Morrissey v. Brewer, 408 U.S. 471, 481 (1972). See also Mathews v. Eldridge; Cafeteria Workers v. McElroy, 367 U.S. 886 (1961).

# **BACKGROUND AND FACTS**

- 18). FOR THE RECORD, Plaintiff [believes] Defendants' establishment/endorsement of an "[Organized Religion of THEIRS]" *per se* as ("[Taxology]") involves a theology forum of the Defendants' IRS activities described in [OVC/Petition] manifested by other types of forums vs. a forum encompasses or focus on the access sought by the speaker.
- 19). FOR THE RECORD, Plaintiff's [conscience] dictates and has averred Defendants' establishment/endorsement of an [Taxology] violates the *free exercise clause* in the right of Plaintiff's free or pure speech & [Protected Speech], *inter alia* manifesting certain violations of the Due Process Clause of the Fifth Amendment of the U.S. Constitution.
- 20). FOR THE RECORD, a self-evident truth and Plaintiff's [conscience] dictates Defendants' establishment/endorsement of [Taxology] has generated substantive issues against Plaintiff's [CLP], *free exercise rights* of [Protected Speech] and with his establishment challenges relating to the advancement of religion and religious conversion, *as a distinct & palpable injury in fact*.
- 21). FOR THE RECORD, a self-evident truth and Plaintiff's [conscience] dictates Defendants' establishment/endorsement of an [Taxology] allows for or manifesting "[IRS Path of Life is to

keep your Faith THEIRS for a **religion of reality**]." *per se* as ("[IRS Path of Life]"). Plaintiff averred Defendants' [IRS Path of Life] has established a forum that encompasses or focus on the access sought by the speaker for Modes of [Worthship] & a Doctrine of Exchange, *inter alia*.

- 22). Plaintiff's [conscience] dictates Defendants' [IRS Path of Life] violates the letters and spirit of the First Amendment vs. Plaintiff's [Protected Speech], [CLP] & [LLP] as an artful blend of the First Amendment, U.S. Supreme decision or doctrines, and Plaintiff's personal constitution.
- 23). FOR THE RECORD, Plaintiff averred within his [OVC/Petition] certain establishment/endorsement clause challenges in relation to the Lemon Test Purpose Prong, such as with Modes of [Worthship] & the duress in a religion of reality.
- 24). FOR THE RECORD, Plaintiff averred within his [OVC/Petition] certain establishment/endorsement clause challenges in relation to the Lemon Test Primary Effect Prong, such as, Defendants granting unbridled IRS approval & disapproval of religion.
- 25). FOR THE RECORD, Plaintiff averred within his [OVC/Petition] certain establishment/ endorsement clause challenges in relation to Lemon Test Entanglement Prong, such as Defendants' actions and IRS activities are tantamount to a relationship pregnant with involvement within and of religion.
- 26). FOR THE RECORD, Plaintiff averred within his [OVC/Petition] certain *free exercise* clause violations of Plaintiff's free and [Protected Speech], expression or discussion of his [CLP] or *fundamental free exercise principles* and personal constitution as an Artful Blend for his life, liberty and pursuit of happiness.
- 27.) FOR THE RECORD, Plaintiff averred within his [OVC/Petition] Defendants' Legal sanctions for Frivolous Tax Arguments manifests Chilled Speech and Content-based restrictions,

as well as, viewpoint-based discrimination or encroaches on person(s) or the Plaintiff engaging in *peaceful expressive activity* pursuant to *fundamental free exercise rights* of the First Amendment.

- 28). FOR THE RECORD, Plaintiff averred within his [OVC/Petition] germane violations of the Unconstitutional Conditions Doctrine, such as "[Federal tax exempted status issued by IRS or as declared by Taxpayers]" *per se* as ("[Exemptions]"), *inter alia*, IRS certain status of religious discrimination or as acts of class warfare, or manifested second-class citizenship status.
- 29). IN THE RECORD, "Plaintiff avers Defendants' religion makes Plaintiff's second-class citizenship status as a taxpayer an "injury in fact" when Plaintiff refused to take the side of taxprayers given first-class citizenship status by Defendants' law, conduct and activities alleged herein." [OVC/Petition] ¶ 2090.
- 30). FOR THE RECORD, Plaintiff averred within his [OVC/Petition] numerous allegations, averments, of facts of governmental mandatory self-assessment values and beliefs in violation of the First Amendment or that [§501] & §6702 or of the [THE CODE] itself concerning substantial burdens of overbreadth & void for vagueness doctrines.
- 31). IN THE RECORD, Plaintiff's [Protected Speech] proclaims: "Plaintiff [believes] when a person believes in, practices or makes a proper return to the IRS and their path of life, beliefs and practices it manifests [Worship of Argumentative Wealth, Words & Wants of Materialism] ("[Worthship]"). This proselytizing effect is for a religion of reality; an IRS Path of Life to keep your Faith THEIRS. These activities in Defendants' endorsements are advanced by an Organized Religion of THEIRS, *per se* as Taxology." [OVC/Petition] ¶ 5.
- 32). IN THE RECORD, Plaintiff's pure speech and [Protected Speech] asserts: "The challenged government conduct and activities have no legitimate, compelling interest or clear secular purpose, but has the actual purpose of endorsing religion with the primary effect of advancing it. This

inhibits, impinges and burdens Plaintiff's free exercise of his religion, conscience, [Protected Conduct], [Protected Speech] or other free exercise rights. [THE CODE] controls, regulates and defines with impunity the "marketplace of ideas". [OVC/Petition] ¶ 26.

- 33). IN THE RECORD, this case and its controversies pertains to, in part: Defendants' actions in an establishment/endorsement of [Taxology] and Defendants' Doctrine of Exchange manifested by [Taxology]'s Modes of [Worthship]; being more particularly described in **Sections J, K, L, M, N, O, & P** in the [OVC/Petition] and incorporated by reference as if fully set forth herein.
- 34). The legal background of [OVC/Petition] also includes accommodations for the *full and* equal rights of conscience, resonating as pure or protected speech. Plaintiff's [OVC/Petition] is "the manner of discharging" duties to his God (Jesus Christ) and response to conflicts between legal and religious duties, that is, where both religion and government claimed jurisdiction. Plaintiff's liberty of conscience means not only a mere liberty of the individual freedom of mind, in believing or disbelieving, but the religious exercises of one selves in a visible way of worship.
- 35). FOR THE RECORD, the [ORDERS] administered by the [Judge] and [Judge Ross] is the unjust exercise or an abuse of discretion over the free exercise principles of the Plaintiff's right to pure speech. These [ORDERS] defeats immunity from compelled speech in the form of an Amended Complaint; a forum advanced by unbridled power in the conformity with Rule 8. The [ORDERS] manifested a lack of due process of the Fifth Amendment of the U.S. Constitution.
- 36). FOR THE RECORD, [ORDERS] 'grounds' are based on the **brevity** of Fed. R. Civ. P. RULE 8(a)(2) and in RULE 8(d)(1) or for the **generality** of its terms; thus exhibiting a lack of compliance with the *void for vagueness doctrine* or allowing a *substantial due process* violation.
- 37). FOR THE RECORD, "The words, 'due process of law' were undoubtedly intended to convey the same meaning as the words 'by the law of the land,' in Magna Charta." See Murray's

Lessee v. Hoboken Land and Improvement Co., 59 U.S. 272, 276 (1855).

- 38). FOR THE RECORD, Plaintiff's [Protected Speech] declares: In Order to Form a More Perfect Union in the name of Justice Equality Service Unity Sacrifice; more particularly described in Exhibit T #7; attached to [OVC/Petition] and incorporated by reference as if fully set forth herein. Plaintiff's [OVC/Petition] shall not be reduced to a mere shadow of his life, liberty and pursuit of happiness, nor shall his *pure speech* in an [OVC/Petition] become the distant echoes of Court's Orders *conformity* with the requirement of Rule 8 seeking an "Amended Complaint".
- 39). FOR THE RECORD, Plaintiff's [OVC/Petition] recognized that his claims such as the one's presented therein are not based on allegations of "bad faith" or averments of "mere pretext." The Court gave Plaintiff's [OVC/Petition] *no careful consideration*, concerning his *free exercise right* to *petition* for *constitutional relief* or in the right to protest Defendants' actions and activities of the IRS; born of *animus* towards this U.S. Citizen's rights of religious belief, protected speech, [conscience] or associational rights in general.
- 40). IN THE RECORD, "This Court, has manifested injustice when **Trial by Ordeal** is used against the Plaintiff to test his *sincerely held religious belief* by compelling him that he shall file an "Amended Complaint in conformity with the requirement of Rule 8". This [OVC] are my sincerely held religious beliefs." ([First Decl. HINDS] ¶7).
- 41). IN THE RECORD, "Defendants' incursions forces the Plaintiff to profess a belief or disbelief in religion that affects him in a personal and individual way through the process of instilling religious doctrines. His religious sensibilities and legal calculus predicates taxing activities; herein conferring upon taxprayers special favors, benefits or rights. Equally, if not practiced by a person, dissenters or the Plaintiff all will suffer substantial disabilities or worse, penalties." [OVC/Petition] ¶ 3.

- 42). FOR THE RECORD, Plaintiff's case and its controversies, "on the merits" decides claims by the most efficient means and captures this most basic aspiration of an ideal civil justice system. Plaintiff's [OVC/Petition] based upon the facts supported by evidence and the law applied to that evidence, advancing constitutional resolutions that can be justified by the *exercise of reason*.
- 43). FOR THE RECORD, Plaintiff's case and its controversies, when justly judged "on the merits" reveals *religious status discrimination*, that Defendants' IRS activities are indoctrinating, proselytizing or converting *taxpayers* into *taxprayers* with the establishment and/or endorsement of an [Organized Religion of THEIRS] *per se* as "[Taxology]", being more particularly described in Exhibits F #1 through F #55; attached to [OVC/Petition] and incorporated by reference as if fully set forth herein. *Religious discrimination so unjustifiable as to be violative of due process*.
- 44). IN THE RECORD, against Defendants' inequalities or injustices: "The Establishment Clause prohibits the practice or prevents a pattern within Defendants' IRS activities from indoctrinating, proselytizing or converting taxpayers into taxprayers." [OVC/Petition] ¶ 1619.
- 45). FOR THE RECORD, as to Plaintiff's *free exercise right* of his "sincerely held religious belief" ("[believes]") or the dictates of his [conscience] are not assumptions of Truth, rather in the assessment of Truth for a *fact-based pleading* and Rule 8 entitlements *in this moral & legal battle*.
- 46). **FOR THE RECORD**, the prevalent formula, rule and focus of evil in the modern age is Mankind accepting "[A Complacent Policy of Indifference to Evil]" per se ("[To LIVE as EVIL]"). If the Court allows the interpretation or implementation in a "conformity with the requirements of Rule 8, which requires a 'short and plain statement of the claim(s)' and that '[e]ach averment of a pleading shall be simple, concise and direct'" to govern, dictate or define **First Amendment free** exercise principles and rights, our Nation will witness war, as written in The Book of Revelation.

47). Reagan declared over 50 years ago with the focus of evil in the modern age: "There is a price we will not pay. There is a point beyond which they must not advance"... *in any moral battle* or *legal battle* where simple, concise and direct thoughts or short and plain statements of expressive activity or speech governs, dictates or defines First Amendment free exercise/establishment rights.

Wherefore premises considered, and relief sought, this Notice touches the letters & spirit of the Court's [ORDERS] with Plaintiff seeking a remedy in court sanction *legal* and *constitutional* relief through an "ORIGINAL VERIFIED COMPLAINT FOR DECLARATORY JUDGEMENT, INJUNCTIVE AND OTHER APPROPRIATE RELIEF IN THIS PETITION FOR QUINTESSENTIAL RIGHTS OF THE FIRST AMENDMENT". However, the [Judge] and [Judge Ross] of the Court are attempting to exclude from a public place (U.S. District Courthouse) a person, (in this case the Plaintiff) engaged in *peaceful* expressive activity solely because the government actors fears, dislikes, or disagrees with the views expressed. Plaintiff's [OVC/Petition] and his notice pleadings seeks a measure of justice and law.

Respectfully Submitted,

Date: May 8, 2017

TERRY LEE HINDS, *Pro se* 438 Leicester Square Drive Ballwin, Missouri 63021 636-675-0028 *quest76@att.net* 

# **VERIFICATION OF NOTICE**

I, Terry Lee Hinds of lawful age is the Plaintiff in this civil action. I verify that I read this verification and Notice filed in this case: FILE NUMBER: 4:17 – CV – 750 JMB on May 8, 2017, and declare under penalty of perjury and under the laws of the United States of America that the foregoing facts in the Notice are correct and true to the best of my knowledge, information and my sincerely held religious beliefs.

Respectfully submitted,

TERRY LEE HINDS, pro se, Plaintiff 438 Leicester Square Drive Ballwin, Missouri 63021 PH (636) 675-0028

Email address: quest76@att.net

Executed this 8th day of May, 2017

# CERTIFICATE OF SERVICE AND DELIVERY

I hereby certify that the foregoing was filed this 8<sup>th</sup> day of May, 2017 and served upon Defendants and its U.S. Attorney, by the Plaintiff, hand delivery and by First class postage prepaid, U.S. Certified mail # 7009-0960-0000-0249-6866 at the following address:

U.S. Attorney or Acting U.S. Attorney Costantin The United States Attorney's Office Eastern District of Missouri Thomas Eagleton U.S. Courthouse 111 S. 10th Street, 20th Floor, St. Louis, MO 63102 Initials \_\_\_\_\_

Signatures of

Date: May 8<sup>th</sup>, 2017 TERRY LEE HINDS, *Pro se* 

438 Leicester Square Drive Ballwin, Missouri 63021 636-675-0028 quest76@att.net

## **LEGAL NOTICE** OF THE FOLLOWING:

Plaintiff mailed a copy to Gregory L. Mokodean not because of any assume legal right and/or reasonability or responsibility of the Plaintiff, rather for my respect for the U.S. Justice Department

Gregory L. Mokodean
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 7238
Washington, D.C. 20044
First Class U.S. Mail & Non-Certified

Signatures of

Date: May 8<sup>th</sup>, 2017

TERRY LEE HINDS, *Pro se* 438 Leicester Square Drive Ballwin, Missouri 63021 636-675-0028