

**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: 4:17 – CV – 750 AGF
<i>Pro se,</i>	}
Plaintiff,	}
	}
-Vs-	}
	}
“UNITED STATES” GOVERNMENT,	}
	}
Defendants.	}
	}

**PLAINTIFF’S HYBRID PLEADING #1 MAKING A CONSCIENTIOUS EFFORT TO
COMPLY WITH COURT’S ORDERS MANIFESTING AN AMENDED COMPLAINT
[Revelation #1]**

TO THE DEFENDANTS:

Please take notice that the undersigned, Plaintiff TERRY LEE HINDS, *pro se* (“Plaintiff”) pursuant to the Court’ Orders (Doc. Nos. 8, 18, 29, 36, 42), Fed. R. Civ. P. RULE 15(2), and the First Amendment; Plaintiff hereby gives notice and enters into the record, the following *sacred or sincerely held religious beliefs and/or secular statements*, truths, averments, or allegations all having a basis in law or fact; thereby *to deliver a different message under exactly the same circumstances adversely effecting or substantially burdening Plaintiff’s sincerely held religious beliefs and his civil liberty, including other vital First Amendment rights or protections under the rule of law*. Plaintiff states the following to be admitted or denied by Defendants, and hereby states:

FIRST AMENDMENT RIGHT TO PETITION AND PROTEST

Plaintiff *exerting legal rights* filed with the Court on February 16, 2017 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 Brief in Support, with an Exhibit List consisting of 26 pages instituting 510 Exhibits attached thereto; a case and its controversies listed on 549 pages] (“[OVC/Petition]”). Plaintiff is *engaged in peaceful expressive activity* pursuant to established *fundamental free exercise rights* of the First Amendment and the rule of law of this Nation. A message as *pure speech* of *religious belief*.

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).

I. PRELIMINARY STATEMENT - NATURE OF THE CASE & ITS CONTROVERSIES

- 1) This action arises under the Establishment/Free Exercise Clause of the First Amendment of the United States Constitution.
- 2) This lawsuit is not about taxation. It is about religion and what is central to one's sincerely held religious beliefs, its expressive activities, the nature of the relevant forums or the rule of law used, primarily aimed at protecting non-economic interests of a spiritual and religious nature as opposed to a physical or pecuniary nature.
- 3) Where a given religion is strongly associated – or perceived to be associated, manifested by the said parties proselytizing or when engaged in numerous forms of religiously oriented expressions of their activities, it cultivates intrinsic and expressive associations.
- 4) The legal endorsements of the said parties proselytizing or when engaged in numerous

forms of religiously oriented expressions of their activities through the Internal Revenue Code and its Federal Taxing Statutes (“IRC/FTS”) has encouraged loyalty and given a hierarchy exclusive patronage of the national government involving the spheres of religious activity.

- 5) Plaintiff’s conscience dictates free exercise principles do not cause a man to sacrifice his integrity, his rights, the freedom of his convictions, the honesty of his feelings, or the independence of his thoughts. These are Mankind’s supreme possessions. These are not the objects of sacrifice.
- 6) Plaintiff’s [sincerely held religious beliefs] (“[believes]”) the mind is a sacred place with the human heart (emotions) being a sacred space found within us all. Within these most sacred precincts of private & domestic life, religious experiences are created for many people or this Plaintiff.
- 7) In light of forces and influences in the forums of dialogue shared or exercised in the eyes of its beholders, whether reserved or germane to said Parties’ participation is an issue herein.
- 8) Whether openly or secretly in the affairs of any religious practice, Federal questions arise in the interplay between Establishment challenges and the free exercise clause and what is truly the right test(s) for evaluating such issues presented in this case and its controversies.
- 9) Plaintiff [believes] when a person believes in, practices or makes a proper return to the Internal Revenue Service (“IRS”) and their path of life, beliefs and practices it manifests Worship of Argumentative Wealth, Words & Wants of Materialism.
- 10) Plaintiff [believes] Worship of Argumentative Wealth, Words & Wants of Materialism is manifested as a system of Worthship.

- 11) Defendants have manifested a proselytizing effect for a religion of reality, advanced by an IRS Path of Life to keep your Faith THEIRS.
- 12) Religious activities of Defendants' endorsements are advanced by an Organized Religion of THEIRS, *per se* as Taxology.
- 13) Scientology, is one of the many IRS' endorsed religions, with a religious belief system declaring "Auditing is precise, thoroughly codified and has exact procedures".
- 14) Scientology chief religious tenant is an identical dogma of THE IRS, shared or created, that supports the undue influences of the giving of new and useful information to the IRS' Tree of Knowledge of good beliefs and evil practices.
- 15) Defendants' activities and conduct with Intellectual Tithing is taxing the human spirit and soul.
- 16) Defendants' activities and conduct with Publications, Instructions & Forms of THEIRS or to "see" their stepping stones of enlightenment values is advances as a Govspel of THEIRS.
- 17) Plaintiff [believes] when a person believes in, practices or makes a proper return to the IRS and their path of life, beliefs and practices Defendants are advancing a system of religious beliefs, practices and convictions in Taxology.
- 18) Plaintiff [believes] to make a proper return to the IRS and their path of life, beliefs and practices, a person or the Plaintiff must compromise their personal values or constitutional rights.
- 19) Plaintiff [believes] to make a proper return to the IRS and their path of life, beliefs and practices, a person or the Plaintiff must Worthship advanced as Worship of Argumentative Wealth, Words & Wants of Materialism.
- 20) Plaintiff [believes] Defendants' religious activities and endorsements are the benefits or

privileges offered & provided, as a Body of Rites, when making a proper return to a system of Worthship.

- 21) Plaintiff [believes] Defendants' religious activities have endorsed Peter to Paul Mandates existing as the policies, rules, guidelines & mandates created to rob Peter to pay Paul.
- 22) Plaintiff [believes] Defendants' religious activities have manifested the Force and Effect of Law Respecting an Establishment of Religion per se as [THE WORDS] of **THEIRS**.
- 23) Plaintiff [believes] Defendants' religious activities have manifested Government Speech creating spirituality, assessment & empowering Body/Mind/Spirit advanced by or express as [Government Speech].
- 24) Plaintiff [believes] [Government Speech] is for taxp[r]ayers that forces persons to profess a belief or disbelief in an IRS religion.
- 25) Plaintiff [believes] Defendants' described activities herein crafts dependent conditions for an IRS' *body of believers* manifested the Fruits of the Purpose-Driven Life of **THEIRS** – the semblances of religion.
- 26) Plaintiff [believes] an IRS Pilgrimage, Knowing the Unknowable Answers Exist is advanced by The ABC's of Salvation: Admit – Believe – Confess.
- 27) Plaintiff [believes] an IRS' dogma of knowing how to know, *per se* being of one substance, essence and nature of a usurping body of law.
- 28) Plaintiff [believes] the **Internal Religious Service**, aka IRS or [IRS], & its [Mega Church] is utilizing the prestige, power, and influence of a public institution.
- 29) Plaintiff [believes] the Defendants' [Mega Church] is a church being organized on corporal & corporate logic seen as a collective experience of religious phenomenon.
- 30) Plaintiff [believes] the Defendants' U.S. Individual Income Tax Return, Form 1040 *per se*

as [Form 1040] is a covenant, petition and viewpoint, *inter alia*, a forum of expressive activity.

- 31) Plaintiff [believes] the establishment of U.S. Individual Income Tax Return, Form 1040 or its endorsements advances IRS' religious effects converting taxpayers into taxprayers.
- 32) Defendants' conduct and endorsements of religious belief over the lack of such belief with their establishment of religion, makes an "injury in fact" by its laws and practice.
- 33) Defendants' conduct has subjected Plaintiff with adverse effects and burdens on his First Amendment free exercise rights of life, liberty and pursuit of happiness ("[LLP]") which shapes the causes of action in this notice and pleading for an amended complaint.
- 34) Plaintiff challenges the constitutionality of Defendants' activities in proselytizing a taxing environment, culture, realm or sacred precincts into the described formations, implements, atmospheres of religious belief and indoctrination, creating religion, not reason.
- 35) Defendants' IRS proselytism, or law respecting an establishment of religion, is repugnant to Plaintiff's religious beliefs or secular beliefs based on the rule of law of this Nation.
- 36) Defendants have fused religion, revenue and returns into an Orthodoxy of **THEIRS**.
- 37) Defendants' religious infusions, endeavors or core values are enmeshed in IRC/FTS and [THE WORDS] of **THEIRS**.
- 38) Defendants' activities herein, causes a man or Plaintiff to pray or barter away his life, freedom, or substantial rights, only to produce an orthodox result which the Defendants could never command directly.
- 39) Defendants' activities herein, manifested unconstitutional conditions which have endorsed or embraces that Defendants may grant benefits or one's rights on the condition that the beneficiary surrender constitutional rights.

- 40) Defendants' Orthodoxy of THEIRS has the power of an organized religion, using the force of law.
- 41) Defendants' activities herein, manifested a force with dogmatic regulations, or within the submissive enumerations calling for an identification of the solicitors of an offered tax benefit, is grounded on a contrived return of a tax.
- 42) Defendants' activities herein, has given IRS authorities some basis/census for investigating strangers coming into the IRS' community, culture or its realm when making a proper return for the reason that IRS Path of Life is to keep your Faith THEIRS for a religion of reality.
- 43) 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.
- 44) Plaintiff's religious sensibilities and legal calculus predicates taxing activities endorsed or manifested herein, conferring upon taxprayers special favors, benefits or rights.
- 45) Plaintiff's religious sensibilities and legal calculus rests described herein, equally, if not practiced by a person, dissenters or the Plaintiff all will suffer substantial disabilities or worse, penalties.
- 46) Plaintiff [believes] the practiced faith in [Form1040] has created a covenant, a viewpoint, also a precedent as giving Defendants' religious Orthodoxy a legal agency in carrying into effect a public and civil duty.
- 47) Plaintiff [believes] Defendants' activities manifested herein, visibly obliterate the essential distinction between civil and religious functions.
- 48) Plaintiff [believes] Defendants' activities manifested herein, advances and act of faith that

- serves a surreal physical & spiritual marriage.
- 49) Plaintiff [believes] and [conscience] dictates IRC/FTS induces a form of a spiritual abortion, as a stillborn plan of escape from laying and collecting taxes on incomes from whatever sources derived.
 - 50) Plaintiff [believes] and [conscience] dictates over a 19 trillion dollars in a national debt confirms an IRS stillborn plan of escape being ineffectual, abortive or fruitless from the creation of its very inception.
 - 51) Plaintiff [believes] Defendants omnipotence in [THE WORDS] of THEIRS harvests the fruits of this spiritual miscarriage, or in time, yields a physical miscarriage of justice.
 - 52) Plaintiff [believes] these religious exercises of THEIRS are elevated or embodied in a spiritual marriage with any person who practices IRC/FTS through a poetic license revealed in [THE WORDS] of THEIRS.
 - 53) Plaintiff [believes] Defendants' activities manifested herein confirms the religious or clerical supremacy of the IRS while advocates confess ecclesiastical supremacy of the IRS.
 - 54) Plaintiff [believes] the advocates of this embodied/spiritual marriage participate or have conviction in "voluntary compliance", an essential religious discipline, as written in [THE WORDS] of THEIRS.
 - 55) Plaintiff [believes] Defendants' Creed "Our core values guide our path to achieving our vision" per se as ("[Creed]") accomplishes a religious bondage, shaping the core values of a person.
 - 56) Plaintiff [believes] this religious Creed of Defendants' IRS converts taxpayers into taxprayers for an organized religion.
 - 57) Plaintiff [believes] Defendants have proselytized a *body of believers* by creating a deified

taxing system.

- 58) Plaintiff [believes] an IRS' body who believes in, accepts, and practices or makes a proper return to the Defendants' IRS advances an organized religion, because IRS Path of Life is to keep your Faith THEIRS for a religion of reality.
- 59) Defendants have produced and endorsed a Doctrine of Exchange using refunds, exemptions, exclusions, credits, deductions, adjustments, or abatements per se as ("[Doc-of-Exch]") through an Institutionalized Faith in Taxism ("[Taxism]").
- 60) Plaintiff [believes] that Taxology is a religion he was 'born into' and later was compelled to assent in a religious faith of Taxism.
- 61) Plaintiff did practice Taxology for over 20 years.
- 62) Plaintiff's religious activities consisted of making a proper return and as a result endorsed Defendants' religion; including all facets of religious observances, practices, or its values.
- 63) Defendants' activities manifested herein, conversely, created justiciable controversies existing with Plaintiff's [Q.U.E.S.T.] and codified fruits in a personal stake of taxation by confession.
- 64) Plaintiff [believes] every rebate from a tax when conditioned upon expressive activities or conduct is in some measure a temptation, a religious belief, a devout practice, or a moving experience.
- 65) Plaintiff [believes] acts of atonement, redemption or symbolic conduct, are central to and compelled by, Defendants deified taxing system composed of religious tenets or other essential religious endeavors as an exercise or it's simply a means to an end.
- 66) Plaintiff [believes] Defendants' activities manifested herein, breeds, advances or endorses *A Complacent Policy of Indifference to Evil per se as To LIVE as EVIL.*

- 67) Plaintiff [believes] the function of [To LIVE as EVIL] in one's life, as obvious by, a genuine nexus occurs with tax refunds, exemptions, exclusions, credits, deductions, adjustments, and abatements as dutiful.
- 68) Plaintiff [believes] Defendants' activities manifested herein, serves as evidence of an organized religion, its endeavors or its expressive activities in the various forms of salvation offered and redemption provided by Taxology.
- 69) Plaintiff [believes] dealings with the IRS transforms one's legal status as citizens into customers of **THEIRS**.
- 70) Plaintiff avers there is no legal nexus between a legitimate government interest (power to lay and collect taxes on incomes) and Defendants' actions herein, being beliefs, tools and atmospheres for religious indoctrination.
- 71) Plaintiff avers any legal nexus is offensive once a constitutional right turns upon whether a governmental benefit is characterized as a right or as a privilege; when fostering religious experiences, overtones of indoctrination, or a support for a compulsory religion.
- 72) Defendants producing clear deprivations of, or use conduct impermissibly infringes upon Plaintiff's free exercise rights of his [LLP] & his Controlling Legal Principles, per se as [CLP].
- 73) Defendants' activities and conduct manifested herein are using evils, incursions or invasions on Fundamental Liberty Interests and Property Interests of the First Amendment.
- 74) Plaintiff's [conscience] dictates his Liberty of Labor is a most sacred property & Individual Freedom of Mind – a sacred place. Such matters are beyond “Service + Enforcement = Compliance” an IRS' dogma.
- 75) Plaintiff has a right to decline to foster IRS' religious, political, and ideological beliefs

while exercising his Quintessential Rights of the First Amendment, its penumbral, as an unenumerated right of the Plaintiff.

- 76) Plaintiff avers the Establishment/Free Exercise Clauses were to prevent such a fusion of governmental and religious functions; when so permeated by religion that the secular side cannot be separated from the sectarian, seeing taxpayers per se as taxprayers.
- 77) Plaintiff avers Defendants' activities complained of herein, makes a person's religious beliefs relevant to his or her standing in the political community by conveying a message that religion or a particular religious belief is preferred.
- 78) Plaintiff avers Defendants' activities complained of herein, is not a manifestation of religious neutrality.
- 79) Plaintiff avers compelled associations and religious composition of government-sponsored speech, or its forums are a designed result in "[A Complacent Policy of Indifference to Evil]" *per se* as ("[To LIVE as EVIL]").
- 80) Defendants' activities herein captures the essential commands of the Establishment Clause.
- 81) Plaintiff avers 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.
- 82) Defendants' activities herein inhibits, impinges and burdens Plaintiff's free exercise of his religion, conscience, [Protected Conduct], [Protected Speech] or other free exercise rights.
- 83) Defendants' IRC/FTS activities and conduct herein, controls, regulates and defines with impunity the "marketplace of ideas".
- 84) Defendants are fostering an excessive entanglement with religion and henceforth have created forced choices, threats, sanctions, or a coercive intent initiated by offering and

- penalizing or denying religious benefits, incentives or aid for unparalleled considerations.
- 85) Plaintiff avers an organized religion ensnared by Defendants' own actions, operating the various forums in a particular manner and permitting religious expressions, confessions or dutiful activities to take place therein.
 - 86) Plaintiff avers any objective and reasonable observer perceives such actions of the described governmental activities are motivated by religious syncretism; a religious perspective communicating messages often of contradictory beliefs, while blending practices of various schools of religious thoughts.
 - 87) Plaintiff's belief-system, is rooted in religion, is protected by the free exercise clause; which, by its terms, is given special protections by Establishment Clause.
 - 88) Defendants' activities manifested herein or such associations reveal true semblances of syncretism, sponsoring religious beliefs, exercises and endeavors; thus creating an excessive government entanglement with an organized religion's forms of salvation.
 - 89) Defendants' activities manifested excessive entanglement or does unescapably result from a germane fact that subsidy, benefit and its census are establish on an annual basis, when adherents/converts make a proper return to the IRS and its path of life, beliefs and practices.
 - 90) Defendants' activities manifested conditions upon public benefits cannot be sustained if they so operate; whenever their purpose devalued or deters the free exercise of First Amendment freedoms.
 - 91) Plaintiff avers to condition the availability of benefits or subsidy on religious practices, Plaintiff's voluntary compliance violates cardinal principles of his religion and secular faith effectively penalizing free exercise of constitutional liberties.
 - 92) Plaintiff avers one faithful cardinal principle of his is the separation of church and state.

- 93) Plaintiff avers a separation principle identical to: “is it lawful to pay taxes to Caesar?” Jesus said to them: “Therefore render to Caesar the things that are Caesar's, and to God the things that are God's”.
- 94) Plaintiff avers our religious experiences of truth or falsity of one’s own constitution is a forbidden domain of the Defendants, utilizing the prestige, power, & influence of a public institution.
- 95) Plaintiff avers Defendants are compelling a person to choose between exercising a First Amendment right and participation in an otherwise available public program of tax subsidies, benefits or endeavors. Such activities serve religious purposes and have a primary effect of advancing religion versus the obviously secular function of laying and collecting taxes on incomes.
- 96) Defendants’ IRS activities manifested herein are endorsements of religiously motivated conduct, beliefs, assemblies or activities which have made the secular purpose, or the genuine power to lay and collect taxes on incomes merely secondary and a total sham.
- 97) Plaintiff avers Defendants’ IRS religious autonomy can degraded, deprived or further its religious harassment or hostility towards the unclean, using a Collective Experience of religious dominance, decisions and its taxing dimensions.
- 98) Plaintiff avers has a First Amendment free exercise right of religious beliefs; thereby [believes] in Taxology and [Taxism]; but conversely has a First Amendment Establishment right not to practice, partake or advance these established religions.
- 99) Plaintiff’s [conscience] dictates: I am an architect of my [LLP]. I know what is to come by the principle on which it is built. Freedom is the light of all sentient beings with the right to exist as I Am, not as any person.

- 100) Plaintiff avers the laws at issue and Defendants' actions complained of by act or word, as set forth in this notice and other pleadings manifests violations of: (1) Establishment Clause Tests, (2) Endorsement Tests, (3) Free Exercise Clause Tests, (4) Balancing Tests of Court: "Strict Scrutiny" manifested in "Compelling Interest Test" (5) Content-Based Restrictions Test, and squarely conflicts with (6) Doctrines of Substantial Overbreadth & Void for Vagueness (7) Public Forum Doctrine, (8) Unconstitutional Conditions Doctrine or with Plaintiff's [CLP] for his [LLP].
- 101) Plaintiff avers he brings this action as a U.S. Citizen, not to define him as an IRS' taxp[r]ayer or as a customer "**dealing**" with the Internal Revenue Service.
- 102) Plaintiff avers his [Questions Utilizing Evidence Seeking Truth] *per se* as ("[Q.U.E.S.T.]") warrants one's Quintessential Rights with the prospective relief in a right to exist as I Am versus a personal stake as *defined, designed, driven, devalued, degraded, deprived*, or fearful to be *destroyed* by law respecting an establishment of religion in a matrix of **religious dealings**.
- 103) Plaintiff reinstates and presents the Merits of his action, for the Intersection of Church and State as Plaintiff's revelations revealed as evidence and legal 'grounds' based in law and fact, and is more particularly described in Exhibit D #1 through Exhibit D#32; attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.
- 104) Plaintiff avers The Intersection Church and State advances the germane legal matters of illuminating the link between asserted injury or harm and relief sought.
- 105) Plaintiff has alleged a personal stake in the outcome of the particular controversies of this case as "to assure that concrete adverseness which sharpens the presentation of issues upon

which the court so largely depends for illumination of difficult constitutional questions."

See Baker v. Carr, 369 U.S. 186, 369 U. S. 204 (1962).

Wherefore premises considered, as this is not presented as a "motion for reconsideration" or any other contrived idea or as a *frivolous interpretation* of a legal process, rather presented to the "Defendants" so they can admit or deny, for the record, Plaintiff's sacred or sincerely held religious beliefs or secular statements, truths, averments, or allegations having a basis in law or fact. For the record, this notice and pleading seeks a *measure of justice* and a *due process of law* as, Plaintiff's *sincerely held religious beliefs* are not *frivolous* in the "United States" or within any court of law for the United States of America.

Respectfully Submitted,

Date: June 14, 2017

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

VERIFICATION OF NOTICE AND HYBRID PLEADING

I, Terry Lee Hinds of lawful age is the Plaintiff in this civil action. I verify that I read this verification of Notice and hybrid pleading filed involving this case: FILE NUMBER: 4:17 – CV – 750 AGF on June 14, 2017, and declare under penalty of perjury and under the laws of the United States of America that the foregoing facts, truths, averments or allegations in the hybrid pleading are correct and true to the best of my knowledge, information or my sincerely held religious beliefs.

Respectfully submitted,

Executed this 14th day of June, 2017

In re: TERRY LEE HINDS, Petitioner,
438 Leicester Square Drive
Ballwin, Missouri 63021
PH (636) 675-0028

CERTIFICATE OF SERVICE AND DELIVERY

I hereby certify that the foregoing was filed this 14th day of June, 2017 and served upon Defendants and its U.S. Attorney, by First class postage prepaid, U.S. Certified mail # 7008-3230-0001-6638-2478 at the following address:

Gregory L. Mokodean
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 7238
Washington, D.C. 20044

Initials _____

Signatures of

Date: June 14th, 2017

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