

**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 #4 MAKING A CONSCIENTIOUS EFFORT TO
COMPLY WITH COURT’S ORDERS MANIFESTING AN AMENDED COMPLAINT
[Revelation #4]**

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).

IV. LAW AT ISSUE AND LEGAL FRAMEWORK

Section A – United States Supreme Court Doctrines & Related Tests or Law

- 1) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in Exhibit A- #1 through Exhibit A- #11 with the confidence that the existing government or its authorities cannot take away established rights, privileges or immunities with impunity or without the due process of law.
- 2) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in The Establishment Clause Doctrines & Test, more particularly described in Exhibit A- #1 attached to Plaintiff’s Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.
- 3) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in

The Neutrality, Coercion & Endorsement Doctrines & Test, more particularly described in Exhibit A- #2 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.

- 4) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in The Free Exercise Clause under the [RFRA], more particularly described in Exhibit A- #3 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.
- 5) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in The Courts Strict Scrutiny Test manifested in Compelling Interest Test, more particularly described in Exhibit A- #4 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.
- 6) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in The Content-Based Restrictions, more particularly described in Exhibit A- #5 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.
- 7) Plaintiff avers he has a lawful right not to be subject to Defendants' IRS Compelled Speech of a [Protected Speech], more particularly described in Exhibit A- #6 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.
- 8) Plaintiff avers he has a lawful right not to be subject to Defendants' Chilling Effects of Speech and on Individual Freedom of Mind, more particularly described in Exhibit A- #7 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.
- 9) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in

The Doctrines of Substantial Overbreadth, more particularly described in Exhibit A- #8 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.

10) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in The "Void for Vagueness" Doctrine, more particularly described in Exhibit A- #9 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.

11) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in The Public Forum Doctrine of the First Amendment, more particularly described in Exhibit A- #10 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.

12) Plaintiff avers he has a lawful right to rely on the guarantees and protections set forth in The Unconstitutional Conditions Doctrine, more particularly described in Exhibit A- #11 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.

13) Plaintiff's proposed the Doctrine of Operative Facts in the Rule of Law germane in this case, more particularly described in Exhibit A- #12 attached to Plaintiff's Exhibit List (Doc. No. 3) and incorporated by reference as if fully set forth herein.

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