

**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
<i>Pro se,</i>	}	
Plaintiff,	}	
	}	
-Vs-	}	
	}	
“UNITED STATES” GOVERNMENT,	}	
	}	
Defendants.	}	
	}	
<i>Also serve pursuant to Fed.R.Civ.P. 5.1</i>	}	
<i>Constitutional Challenge to a Statute</i>	}	
Jefferson B. Sessions	}	
Attorney General of the United States	}	
Office of the Attorney General	}	
United States Department of Justice	}	
	}	
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Washington, DC 20530-0001	}	
	}	
<i>Also serve pursuant to Fed.R.Civ.P. 4(i)(1)</i>	}	
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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	}	

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**BRIEF IN SUPPORT OF PLAINTIFF’S ORIGINAL VERIFIED COMPLAINT FOR  
DECLARATORY JUDGEMENT, INJUNCTIVE AND OTHER APPROPRIATE RELIEF  
IN THIS PETITION FOR QUINTESSENTIAL RIGHTS OF THE FIRST AMENDMENT**

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COMES NOW, the Plaintiff TERRY LEE HINDS, appearing *pro se* (hereinafter “Plaintiff”) who hereby submits to this Court the following Brief in Support of his “[ORIGINAL VERIFIED COMPLAINT]” (“[OVC]”), and states the following:

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**PRELIMINARY STATEMENT**

This action arises under the Establishment/Free Exercise Clause of the First Amendment of the United States Constitution. Plaintiff is seeking prospective reliefs, pursuant to his [OVC] in order to be able to run his business and conduct his personal or private affairs in a manner consistent with his religions, religious values and within his “[sincerely held religious beliefs]” (“[believes]”); that have shaped his life, liberties and pursuant of happiness, as well as, his little company of a spiritual enterprise from its start. The Plaintiff [believes] and [conscience] dictates, he has a constitutional right to endorse, indoctrinate, or proselytize a religion with the *free exercise* right of religious belief over the lack of such belief. Therefore, this Court must guarantee full First Amendment protection to both the practice of the establishment, endorsement or proselytizing a religion, and with the *free exercise* of religious beliefs.... **as one cannot exist without the other.**

**STATEMENT OF FACTS**

In addition to said facts, Plaintiff respectfully refers the Court to, and incorporate here by reference, as if set forth fully herein, the facts as alleged in the [OVC] and all pleadings, exhibits, and related

documents. Plaintiff has correctly asserted that several issues in this case present mixed questions of law and fact concerning the various controversies of the said parties involved. This case, *inter alia*, involves the application or interpretation of legal principles of U.S. taxation. The Sixteenth Amendment and Article I, Section 8, Clause 1 (Taxing and Spending Clause) are the source of congressional authority to levy taxes pursuant to constitutional limitations or restrictions. This [OVC] is the evidence of Defendants' actions, forcing the Plaintiff to profess a belief in a religion.

### **PLAINTIFF'S CAUSES OF ACTION**

Plaintiff's [OVC] has set forth seven meritorious causes of action involving various controversies that are substantial and concrete, that touch the legal relations of parties with adverse interests; with the Plaintiff seeking specific declaratory, injunctive and other appropriate relief. Plaintiff's averments to each cause of action is set forth in his [OVC]. Plaintiff shall file seven preliminary injunctive motions pursuant to relief requested in each Count. Plaintiff's constitutional claims are:

#### **COUNT I**

**VIOLATION OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION**  
Establishment Clause Violation – [THE CODE] is Law Respecting an Establishment of Religion  
Free Exercise Clause Violation of Plaintiff's Quintessential Right of Religion & Belief *inter alia*.

#### **COUNT II**

**VIOLATION OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION**  
Establishment Clause Violation – Endorsement of an Organized Religion of THEIRS [Taxology]  
Free Exercise Clause Violation of Plaintiff's Quintessential Right of Protected Speech, *inter alia*.

#### **COUNT III**

**VIOLATION OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION**  
Establishment Clause Violation – Establishment/Endorsement of an **I**nternal **R**eligious **S**ervice  
Free Exercise Clause Violation of Plaintiff's Quintessential Right of Conscience, *inter alia*.

#### **COUNT IV**

**VIOLATION OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION**  
Establishment Clause Violation - The Endorsement of an Institutionalized Faith in Taxism  
Free Exercise Clause Violation of Plaintiff's Quintessential Right of Association, *inter alia*.

#### **COUNT V**

**VIOLATION OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION**  
Establishment Clause Violation- [THE WORDS] of **THEIRS** with the Force and Effect of Law  
Free Exercise Clause Violation of Plaintiff's Quintessential Right of Protest Activities, *inter alia*.

## COUNT VI

VIOLATION OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION  
Establishment Clause Violation – Establishment and Endorsements of a Church Without Walls  
Free Exercise Clause Violation of Plaintiff's Quintessential Right to Petition for grievances

## COUNT VII

VIOLATION OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION  
Establishment Clause Violation – The Fountainhead of Faith as an Orthodoxy of **THEIRS**  
Free Exercise Clause Violation of Plaintiff's rights to Life, Liberties and Pursuant of Happiness

These Establishment Clause challenges are "on its face" or "as applied" with the interest and facts widely shared or goes hand in hand with *free exercise* clause claims. These claims are meritorious.

## STANDARD OF REVIEW

Plaintiff argues the proper judicial review is under First Amendment scrutiny. U.S. District Courts apply the strict scrutiny standard in two contexts: when a fundamental constitutional right is infringed, and those the court has deemed a fundamental right protected by the Due Process Clause of the Fifth Amendment. The second context under [RFRA] reinstated the Sherbert Test, which was set forth by *Sherbert v. Verner*, & *Wisconsin v. Yoder*. The [RFRA] mandates strict scrutiny be used when determining whether Free Exercise Clause violations of religious freedom occurred. To pass [RFRA] strict scrutiny, the law, regulation, policy or other government action must satisfy these tests regarding Plaintiff's *free exercise claims*. See Plaintiff's Exh. A- #3 & 4 in support of:

- A. It must be justified by a **compelling governmental interest**. While the Courts have never **brightly defined** how to determine if an interest is compelling, the concept generally refers to something necessary or crucial, as opposed to something merely preferred.
- B. It must be **narrowly tailored** to achieve that goal or interest. If the government action encompasses too much (**overbroad**) or fails to address essential aspects of the compelling interest, then the rule is not considered narrowly tailored.
- C. It must be the **least restrictive means** for achieving that interest, that is, there cannot be a less restrictive way to effectively achieve the compelling government interest. If the government enacts a law that restricts a fundamental personal liberty, it must employ the least restrictive measures possible to achieve its true goal. This test applies even when the government has a legitimate purpose in adopting the particular law.

The two constitutional doctrines that are closely related to the least restrictive means test are the

overbreadth & vagueness Exh. A- #8, #9. These doctrines are applied to statutes & regulations that restrict constitutional rights. The Overbreadth Doctrine requires that statutes regulating activities that are not constitutionally protected must not be written so broadly as to restrict activities that are constitutionally protected. The vagueness doctrine requires that statutes adequately describe the behavior being regulated. A vague statute may have a chilling effect on constitutionally protected behavior because of fear of violating the statute, such as presented in this case. In [OVC] and within each count motion briefs, Plaintiff has set forth his arguments separately. A certain aspect of this [OVC], creating a *first impression*; sets forth a completely original issue of law as Plaintiff is endowed by his Creator with unalienable rights of *life, liberty and pursuits of happiness*. Plaintiff's Exhibit A-#1 supports First Amend. scrutiny of his ***Establishment Clause claims*** under:

(A) **The Autonomy Doctrine** - *Watson v. Jones*, 80 U.S. (13 Wall.) 679 (1871) "The law knows no heresy and is committed to the support of no dogma, the establishment of no sect."

(B) **The Lemon Test** - (three-part test) - *Lemon v. Kurtzman*, 403 U.S. 602 (1971)

- (1) Does the law have a secular purpose? If not, it violates the Establishment Clause. (*also known as the Purpose Prong*)
- (2) Does its primary effect; either advances religion or inhibit a practice of religion? If so, it violates the Establishment Clause. (*also known as the Primary Effect Prong*)
- (3) Does the law foster an excessive governmental entanglement with religion? If so, it violates the Establishment Clause (*also known as the Entanglement Prong*)

(C) **Separation Doctrine** - *Everson v. Board of Education*, 330 U.S. 1 (1947) The decision in *Everson* marked a turning point in the interpretation and application of disestablishment law in the modern era. "No tax in any amount, large or small, can be levied to support any religious activities or institutions, whatever they may be called, or whatever form they may adopt to teach or practice religion. In the words of Jefferson, the clause against establishment of religion by law was intended to erect 'a wall of separation between Church and State.'"

Plaintiff's Exhibit A-#2 supports First Amend. scrutiny of his ***Endorsement Clause claims*** under:

- (1) **O'Connor's Perception Test** - *Lynch v. Donnelly*, 465 U.S. 668 (1984) a government action is invalid if it creates a perception in the mind of a reasonable observer that the government is either endorsing or disapproving of religion under effect prong of Lemon.
- (2) **Creationism Doctrine** - *Edwards v. Aguillard*, 482 U.S. 578 (1987) barred the teaching of creation science in public institutes on constitutional grounds;

(3) **Intelligent Design Doctrine** -*Tammy Kitzmiller, et al. v. Dover Area School District, et al.* 400 F. Supp. 2d 707, Docket no. 4cv2688 (2005). This endorsement test is invoked in situations where the government is engaged in expressive activities of an intelligent design.

### ARGUMENT

Plaintiff's First Amendment challenges, its violations and merits rest on two premises: first, that Plaintiff is entitled to full First Amendment protection; and second, that the laws at issue and Defendants' actions complained of, by act or word, manifests violations of "[Controlling Legal Principles] ([CLP])"; court applied tests, requirements & case law or doctrines therefore warrants First Amendment scrutiny. As a threshold issue, the *"loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury."* citing *Elrod v. Burns*, 427 U.S. 347, 374 (1976). *see New York Times Co. v. United States*, 403 U.S. 713, (1971). Plaintiff's loss of First Amendment freedoms and clear deprivations of court sanctioned guidance from [CLP] *inextricably entwines the merits* of Plaintiff's claims for relief; as he has suffered and will continue to suffer irreparable injuries or harms with no adequate legal remedy absent a court injunction.

A justiciable case and continuing controversies exists between the parties with respect to Plaintiff's claims seeking declaratory relief. A declaration of law is necessary to determine the respective rights, duties and legal relations of the parties pursuant to wise judicial administration and/or should be granted only as a matter of judicial discretion, exercised in the public interest. In order to prevent further violation of Plaintiff's constitutional rights by Defendants, it is appropriate and proper that a declaratory judgment be issued, pursuant to 28 U.S.C. §§ 2201-2202 and Fed. R. Civ. P. 57, declaring unconstitutional the conduct and activities as set forth in his [OVC] while this Court upholds existing and prevailing [CLP] propagated by the United States Supreme Court.

"This action arises under the Establishment/Free Exercise Clause of the First Amendment to the United States Constitution. 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 used or the rule of law; primarily aimed at protecting non-economic interests of a spiritual and religious nature, as opposed to a physical or pecuniary nature.” [OVC] ¶ 1. The Defendants actions and religious activities in [THE CODE], [CODE-1], [CODE-2], [CODE-3] including but not limited to [26 CFR] & [THE WORDS] of THEIRS has created Establishment/Free Exercise Clause violations. Plaintiff case presents restrictions by law and religion of his *unalienable rights* in “[life, liberty and pursuits of happiness]” (“[LLP]”) as set forth in [OVC]. Supreme Court held:

“Freedom of conscience and freedom to adhere to such religious organization or form of worship as the individual may choose **cannot be restricted by law**. On the other hand, it safeguards the free exercise of the chosen form of religion. Thus, the Amendment embraces two concepts -- **freedom to believe** and freedom to act. **The first is absolute**, but, in the nature of things, the second cannot be.” *see Cantwell v. Connecticut*, 310 U.S. 296, 304 (1940). (Emphasis added)

A. Plaintiff is entitled to full First Amendment protection.

“Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.”

*First Amend. United States Constitution*

B. Level of analysis warrants First Amendment scrutiny.

The laws at issue and Defendants’ actions complained of, by act or word, manifests violations of: (1) Establishment/Endorsement Doctrine & Tests, (2) Free Exercise Clause Test under [RFRA] & Chilling Effect on Speech (3) Balancing Test of Strict Scrutiny Test manifested in the “Compelling Interest Test” (4) Content-Based Restrictions Test, Compelled speech (5) Doctrines of Substantial Overbreadth & Vagueness (6) Public Forum Doctrine (7) Unconstitutional Conditions Doctrine The precise and appropriate tests are addressed within each brief of the pending motions to be file.

**RELEVANT LAW**

**POINT I: PLAINTIFF SATISFY THE STANDARD FOR INJUNCTIVE RELIEF.**

1. Legal Standard of the Eighth Circuit.

In the Eighth Circuit, “A court considering a motion for preliminary injunction must consider (1) the threat of irreparable harm to the movant; (2) the state of the balance between this harm and the injury in granting the injunction will inflict on the other party; (3) the probability of the movant

succeeding on the merits; and (4) the public interest.” quoting *Phelps–Roper v. Nixon*, 509 F.3d 480 (8th Cir.2 007)). citing *Dataphase Sys. Inc. v. CL Sys., Inc.*, 640 F.2d 109, 113 (8<sup>th</sup> Cir. 1981) (en banc). Plaintiff’s action satisfies all four prongs and has made a “threshold showing” of being likely to prevail on the merits. “The likelihood that plaintiff ultimately will prevail is meaningless in isolation.” *Dataphase* at 113. The court has held: “Moreover, when considering the

probability of success on the merits element, the Court is not required at an early stage to draw the fine line between a mathematical probability and a substantial possibility of success. This endeavor may, of course, be necessary in some circumstances when the balance of equities may come to require a more careful evaluation of the merits. But where the balance of other factors tips decidedly toward plaintiff a preliminary injunction may issue if movant has raised questions so serious and difficult as to call for more deliberate investigation.” *Id.*

According to *Phelps-Roper v. City of St. Charles*, 782 F. Supp. 2d 789,791 (E.D. Mo. 2011). "At base, the question is whether the balance of equities so favors the movant that justice requires the court to intervene to preserve the status quo until the merits are determined." *Dataphase*, 640 F.2d at 113. “The equitable nature of the proceeding mandates that the court’s approach be flexible enough to encompass the particular circumstances of each case.” *Id.* “In balancing the equities no single factor is determinative,” *id.*, but the movant must make a “threshold showing” of being likely to prevail on the merits and then “proceed to weigh the other *Dataphase* factors.” *Planned Parenthood of MN v. Rounds*, 530 F.3d 724, 732 (8<sup>th</sup> Cir. 2008) (en banc).

This case and its controversies seeks to enjoin enforcement of a duly enacted Federal statutes, codes, as well as, enjoin a host of government actions contrary to the U.S. Constitution and its germane amendments. Plaintiff argues the [CLP] for his claims seeking prospective relief, a complaint which has formed grave, difficult or serious questions of law that are presented for litigation, should advance under *Phelps-Roper v. City of St. Charles* 782 F.Supp.2d 789 (2011). United States District Court, E.D. Missouri, has declared in a First Amendment case involving *freedom of religious expression*:

"In a First Amendment case, often the determining factor in whether a preliminary injunction should issue is the likelihood of success on the merits. *Id.* (citing *McQueary v. Stumbo*, 453 F.Supp.2d 975, 979 (E.D.Ky.2006)). With respect to the remaining *Dataphase* factors, the Eighth Circuit explained in *Phelps–Roper v. Nixon*, 509 F.3d 480 (8<sup>th</sup> Cir.2007): "A loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable harm;" and "it is always in the public interest to protect constitutional rights;" and finally, "[t]he balance of equities ... generally favors the constitutionally protected freedom of expression." *Id.*

Plaintiff's forthcoming motions for preliminary injunctions, seeks to enjoin Defendants actions that violate the First Amendment both on its face and as applied to him. [THE CODE] specifically targets taxpayers or any persons (i.e. Plaintiff) conduct. First Amendment analysis and his [RFRA] challenges to ensure that his interests in religious freedom are protected by a *pragmatic approach*.

The 8<sup>th</sup> Circuit has held, a case with similar, but not identical issues will apply the "*pragmatic approach*" adopted in *Dataphase*, 640 F.2d at 113. At this stage of the litigation with the "most significant" of the four factors, is whether the Plaintiff is likely to be successful on the merits is preeminent. *Minn. Ass'n of Nurse Anesthetists v. Unity Hosp.*, 59 F.3d. 80, 83 (8<sup>th</sup> Cir. 1996) (quoting *S & M Constrs., Inc. v. Foley Co.*, 959 F. 2d. 97, 98 (8<sup>th</sup> Cir. 1992), *cert. denied*, 506 U.S. 863 (1992)). Finally, the Eighth Circuit has made clear that "**it is always in the public interest to protect constitutional rights.**" *Phelps-Roper v. Nixon*, 545 F.3d 685, 690 (8<sup>th</sup> Cir. 2008). Accordingly, the issuance of a permanent injunction would serve the public interest. The burden of proof is on the party seeking injunctive relief. *Gelco Corp. v. Coniston Partners*, 811 F.2d 414, 418 (8<sup>th</sup> Cir. 1987); *United States v. Dorgan*, 522 F.2d 969, 973 (8<sup>th</sup> Cir. 1975). The Eighth Circuit has held "A district court has broad discretion when ruling on preliminary injunction requests, and we will reverse only for clearly erroneous factual determinations, an error of law, or an abuse of discretion." *Coca-Cola Co. v. Purdy*, 382 F.3d 774, 782 (8<sup>th</sup> Cir. 2004).

## 2. Legal Standard of the U. S. Supreme Court.

The purpose of a preliminary injunction is to preserve the relative positions of the parties until

a trial on the merits can be held. *University of Texas v. Camenisch*, 451 U.S. 390, 395 (1981). To obtain the extraordinary remedy of a preliminary injunction, a plaintiff must show each element:

“[1] that he is likely to succeed on the merits, [2] that he is likely to suffer irreparable harm in the absence of preliminary relief, [3] that the balance of equities tips in his favor, and [4] that an injunction is in the public interest.” *Winter v. Natural Resources Defense Council, Inc.*, 129 S. Ct. 365, 374, 172 (2008).

In *Amoco Production Co. v. Village of Gambell, Alaska*, 480 U.S. 531 (1987) the Court reviewed the well-established principles governing injunctions and stated that “the bases for injunctive relief are irreparable injury and inadequacy of legal remedies.” *Id.* at 542. The lower court “must balance competing claims of injury and must consider the effect on each party of the granting or withholding of the requested relief.” *Id.* “The standard for a preliminary injunction is essentially the same as for a *permanent injunction* with the exception that the plaintiff must show a likelihood of success on the merits rather than actual success.” *Id.* at 546.

### 3. Legal Standard for Rule 65 of the Federal Rules of Civil Procedure.

Rule 65 of the Federal Rules of Civil Procedure (FRCP) governs motions for preliminary injunctions. Rule 65 provides no guidance regarding the standards a court should apply in granting or denying such a motion. Rule 65(a)(1) simply states, “No preliminary injunction shall be issued without notice to the adverse party.” Rule 65(a)(2) provides a mechanism for consolidating the trial on the merits with the motion for a preliminary injunction. Rule 65(d) requires that every injunction order set forth the reasons for its issuance, be specific in its terms, and describe in reasonable detail the acts sought to be restrained. This rule should be read in conjunction with Rule 52(a), which requires the court to make findings of fact and conclusions of law whenever it grants or refuses to grant an interlocutory injunction. Rule 65.1 provides a procedure for enforcing a surety’s liability on an injunction bond by means of a motion in the underlying lawsuit, without the necessity of an independent action. Parties are free to take an interlocutory appeal from the

grant, refusal to grant, dissolution, or modification of a preliminary injunction order. 28 U.S.C. § 1292(a)(1). For the reasons set forth above, Plaintiff satisfies all four prerequisites for issuing a preliminary and thereafter a permanent injunction pursuant to the seven forthcoming motions.

**POINT II: PLAINTIFF SATISFY THE STANDARD FOR DECLARATORY JUDGMENT**

Plaintiff's case meets the standards for declaratory judgment as set forth in his [OVC]. Plaintiff [believes] Defendants activities are converting *taxpayers into taxprayers*; compelled to accept the religious beliefs of "The Service" linking a suspect classification "religion". The controversies in this case including, but not limited to: religion, protected speech, conscience, association, protest & involuntary servitude, *inter alia*. Such First Amendment violations creating a full specter and spectrum of actions arising under the Establishment/Free Exercise Clause. Plaintiff's case and its seven causes of action reveals the facts presenting various actual or substantial controversies, real and immediate, between parties having adverse legal interests. The Declaratory Judgment Act, 28 U.S.C. 2201(a), provides that in a case of actual controversy within its jurisdiction any court of the United States, upon the filing of an appropriate pleading, may declare the rights and legal relations of any party seeking such declaration, whether or not further relief is or could be sought. Any such declaration shall have the force and effect of a final judgement or decree and shall be reviewable as such. Hence, federal questions exists, thereby providing the court with original jurisdiction to determine substantial controversies or federal questions. There is no bright line here, as the Courts have not delineated *religious beliefs*; but has prescribed the "*term 'religion' has reference to one's views of his relations to his Creator and to the obligations they impose of reverence for his being and character, and of obedience to his will.*" quoting *Davis v. Beason*, 133 U.S. 333, 343 (1890).

**RELIEF REQUESTED**

The factual basis for the requested relief, specific remedial relief requested and legal basis for the requested relief is set forth in Plaintiff's seven forthcoming motions for a preliminary injunction,

and in attached briefs in support of the motions. This Court's equitable powers are broad: "***breadth and flexibility are inherent in equitable remedies.***" *Brown v. Plata*, 131 S. Ct. 1910, 1944 (2011); *see also Swann v. Charlotte- Mecklenburg Bd. of Educ.*, 402 U.S. 1, 15 (1971) ("Once a right and a violation have been shown, the scope of a district court's equitable powers to remedy past wrongs is broad, for breadth and flexibility are inherent in equitable remedies."). The distinct and palpable injuries complained of; will indeed be completely redressed by a favorable decision of this Court. Plaintiff's [Q.U.E.S.T.] seeks the *free exercise* in ***Quintessential Rights of the First Amendment*** granted under the full protection and protocols of the First Amendment as guaranteed by the Ninth Amendment to United States Constitution. Plaintiff's [Q.U.E.S.T.] warrants one's ***Quintessential Rights*** with the prospective relief in a ***right to exist as 'I Am'*** and not as ***any person*** in 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***.

### **CONCLUSION**

The maintenance of the social equilibrium is accomplished by the Government through the administration of justice. Because, the Plaintiff has shown that he has suffered and will continue to suffer irreparable harm, that he is likely to succeed on the merits of his claims, that the balance of harms favors the Plaintiff, and that no harm to the public interest would result from the issuance of the relief requested, this Court should grant preliminary and permanent injunctive relief; and declaratory relief consistent with the injunctions, as their exist no adequate remedy at law for the abrogation of Plaintiff's [LLP] under law respecting an establishment of religion or an Orthodoxy that endorses an organized religion of the Defendants as set forth or described in Plaintiff's [OVC].

In the enduring words and true wisdom of the U.S. Supreme Court, concerning a Landmark case:

*"Let the end be legitimate, let it be within the scope of the constitution, and all means which are appropriate, which are plainly adapted to that end, which are not prohibited, but consist with the letter and spirit of the Constitution, are Constitutional."* *McCulloch v. Maryland*, 17 U.S. 316 (1819)

Respectfully submitted,

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

Dated this \_\_\_\_<sup>st</sup> day of February, 2017

**CERTIFICATE OF SERVICE AND DELIVERY**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed this \_\_\_\_ day of February, 2017 and served upon Defendants and its U.S. Attorney, hand delivered by a process server of Frederick Investigations, Inc. located at 11634 Gravois Rd, Saint Louis, MO 63126 (314) 270-8555 at the following address:

U.S. Attorney Richard Callahan  
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 \_\_\_\_\_

**VERIFICATION OF COMPLAINT**

The Plaintiff has reviewed the complaint. Regarding the allegations of which the Plaintiff has personal knowledge, the Plaintiff knows or believes them to be true and genuine. Plaintiff declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February \_\_\_\_, 2017

*Signature of*

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