

U.S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
RECEIVED

SEP 04 2014

TONY R. MOORE, CLERK  
BY  DEPUTY

U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

U.S. DISTRICT COURT

BARBARA JACKSON  
(Plaintiff)

VERSUS

PITTRE WALKER, HERMAN WASHINGTON,  
DENNIS EVERETT, SR., DERRICK THOMAS,  
LAKE COMMUNITY DEVELOPMENT CORPORATION,  
SHREVEPORT HOUSING AUTHORITY,  
(Defendants)

CIVIL ACTION NO. 5:13-cv-02247

JUDGE: S Maurice Hicks

MAGISTRATE JUDGE: Mark L Hornsby

**PLAINTIFF'S MOTIONS PURSUANT TO RULE 60(b)(3)**

Plaintiff, Barbara Jackson moves pursuant to Federal Rule of Civil Procedure 60(b)(3), for the March 7, 2014 order denying Plaintiff's January 23, 2014 supplemental complaint to be vacated; and that Jackson's January 23 supplemental complaint become filed in the record of this case. Plaintiff further moves, pursuant to Federal Rule of Civil Procedure 60(b)(3), for the August 11, 2014 summary judgment order dismissing Housing Authority of Shreveport to be vacated. For specific reasons set forth below, Plaintiff Barbara Jackson respectfully maintains that she should be granted her motions.

**Preface**

Fraud on the court is limited to fraud that does, or at least attempts to "defile the court itself," or that is perpetrated by officers of the court "so that the judicial machinery cannot perform in the usual manner its impartial task of adjudicating cases." 12 Moore's Federal Practice 3d ¶ 60.21 [4][a] (3d ed.2003)

- 
1. Plaintiff Jackson specifically avers that the facts and evidence below prove that Judge Mark Hornsby and Judge Maurice Hicks repugnantly abused their judicial authority, and engaged in fraudulent acts that

subvert the integrity of the judicial process. For their apparent personal and possibly political interests, Judge Hornsby and Judge Hicks violated Constitutional law and achieved illicit aims through deliberate strategies that, *inter alia*, unlawfully accommodate law firms, and whitewash nonprofit financial frauds. As it pertains to this Plaintiff, multiple acts of fraud on the court herein described, created various deprivations of Plaintiff's Due Process and Equal Protection rights.

2. Although fraud on the court occurs in many forms, its purpose is to subvert the judicial process. Therefore, when lawyers and judges commit, as well as conspire to commit frauds for purposes of unfair advantage, and by such means effect tainted rulings and judgment, these are wrongs against the legal institution itself that is set up to protect and safeguard the public. Further, when lawyers and judges engage in revolting, underhanded juridic acts –and by such acts effect sullied judgments and rulings, enforcement of those judgments and rulings become patently unconscionable. Damage caused by fraud on the court not only tarnishes court sanctity and litigant assurances, but fraud on the court egregiously violates the rights of petitioners who have no other choice other than to be bound by outcomes of unfair court proceedings –notwithstanding emotional, physical, financial, and personal depletion litigants unjustly sustain. Repugnant judicial behavior that fits the foregoing description are explicitly described below in this pleading.

**Early On Judicial Subversions Attesting To  
Impossibility of A Fair Trial In A Fair Tribunal**

3. Since this July 8, 2013 fair housing case was filed, as a consequence of odious judicial machinations, this case is being presided over by judges, aided by certain attorneys who unblushingly carry out acts prejudicial to the administration of justice –consisting of, but not limited to these:

4. On or about November 18, 2013, after five defendants failed to timely answer this lawsuit,

their church member Attorney Robert Piper filed a motion to enroll as their representative. Without acknowledging the fact of default, Mr. Piper requested and was granted a 30-day extension in which to plead. Magistrate Hornsby granted that attorney's motions and excoriated Plaintiff Jackson's vigorous November 26 **request for rescission**. Jackson particularly opposed Mr. Piper's enrollment because the representation included five **concurrent adverse defendants, including the nonprofit corporation** utilized by the defendant in causing Jackson's damages and destruction of her vocation. Thus, Jackson's concern was that culpable information and evidence would be withheld.

5. Approximately a month after Mr. Piper enrolled for those five defendants, apparently a second law firm attempted to also enroll as their counsel. However, a December 23, 2013 "NOTICE of Deficiency" was issued to Attorney Brian Homza requiring him to correct his pleadings that included answers to this suit and a motion to enroll. The deficiency notice stated that the defendants were already represented by counsel. Jackson called the clerk's office to learn what would become of the deficient pleadings, because Jackson needed to be able to determine when the clock began to run for Jackson's right to file her motion to strike Mr Homza's Affirmative Defenses and oppose his enrollment for the same reasons she opposed the mr. Piper's multiple representation of conflicting interests co-defendants. When those corrections were not made within the allotted ten days, Jackson again called, and she told Mr. Homza was still being given time to correct his documents. By the date of Jackson's Rule 15(d) motion for leave to file Jackson's supplemental complaint, Jackson stated in her motion the pleadings had not been corrected, and therefore her supplement would not prejudice those five defendants. The NOTICE of Deficiency sent to Attorney Homza:

Document Number: 24

**Docket Text:**

**NOTICE of Deficiency to Brian Allen Homza on behalf of Dennis Everett, Sr, Lake Community Development Corp, Derrick Thomas, Pittre Walker, Herman Washington regarding [23] Answer to Amended Complaint, Answer to Complaint,, [22] MOTION for Brian A. Homza to Enroll as Counsel . Reason: This party is already represented by other counsel. Please refer to provisions under LR83.2.12 regarding appearance of other counsel to ensure compliance with this rule. A motion to enroll as co-counsel or to substitute counsel (signed by the current counsel of record) is required to remedy this situation. (Please also refer to LR5.7.08 regarding electronic filing of documents requiring signatures of more than one party.). (crt,Kennedy, T)**

6. Jackson has never received any court order from Mr. Homza, nor his law firm informing Jackson of their enrollment as counsel in this case for any of the five defendants. More significantly, lack of notice or information meant Jackson's inability to ascertain when the clock began to run, **or if it ever started** for Jackson to rebut and move to strike Affirmative Defenses filed by Mr. Homza. To Jackson's knowledge, to this date, Mr. Homza's deficient pleadings still have not been corrected; and Jackson has not been able to obtain clarity as to what became of pleadings from Mr. Homza.

8. Aside from Jackson never receiving a court signed order enrolling Mr. Homza in this case, nor received corrected pleadings from Mr. Homza, nor anything since December 2013 –yet in what appears to be circumvention of Mr. Homza's apparent refusal to correct his deficient documents – **according to a January 21, 2014 the docket entry, Magistrate Hornsby created an “electronic order”** that somehow appears to render Mr. Homza and the Cook, Yancey, King & Galloway law firm, legal representatives for Mr. Piper's five defendant clients. The “electronic order” is only known to Jackson because of the docket sheet entry. Magistrate Hornsby appears to have acted in excess of his judicial authority by creating an electronic standard that is unavailable to all the plaintiff, and then issuing his own ex parte edict that favors the defendant, but prejudices Plaintiff Jackson. By comparison, Attorney Mijalis also was required to correct his deficient documents; yet the

magistrate seems to have exempted Attorney Homza and the Cook, Yancey, et al., law firm from having to make their corrections. Also, whenever the clock began running for Jackson to file her rebuttals and motions to strike Mr. Homza's Affirmative Defense, demonstratively seems not something she was entitled to know by reason of notice of corrected pleadings.

9. **Jackson is severely prejudiced by Magistrate Hornsby's biased "electronic order," of which Jackson is not even allowed to know what it is, and what it stipulates.** What Jackson does know is that she intended to request the Affirmative Defenses to be stricken, and she intended to take discovery regarding the basis for the Affirmative Defenses. Also, Jackson knows that the deficiency notice, and local rules require compliance or else documents become stricken from the record.

10. Magistrate Hornsby's "electronic order" was gross and unjust interference **that is inconsistent with orderly administration of justice; and it is at odds with notions of fairness central to systems of litigation.** The magistrate's prejudicial act, against Jackson's November 26 protest, of granting defendants who had already deliberately defaulted, 30 days additional time to plead was also abuse of discretion since those defendants did not bother requesting time prior to expiration date.

11. **Jackson remains impeded from taking discovery, predominantly due to byzantine judicial interference, and impediments such as those described in this pleading.** As recently as August 2014, defendant Shreveport Housing Authority was wrongfully granted summary judgment even though Jackson has never had discovery. Although it is well established that a party opposing summary judgment **must "go beyond the pleadings,"** Jackson, who has had no discovery, and who repeatedly avers that the defendants fraudulently concealed facts and information, would find it next to impossible to "go beyond the pleadings" for purposes of successfully opposing summary

judgment.

12. The August 11, 2014 denial to take discovery, and the grant of summary judgment revealed that a January 7, 2014 memo from Magistrate Hornsby regarding a “Scheduling Order” Jackson would receive, was meaningless. What Jackson understood from the memo is that she would be able to begin discovery after receiving a Scheduling Order. When no scheduling order came, Jackson’s inquiries accomplished no meaningful information other than she needed to wait until the scheduling order was sent.

13. Jackson opposed **legal representation in the same lawsuit adverse conflicting interest co-defendants** that included corporation that was used in causing Jackson’s damages and injuries. In each of Jackson’s pleadings, Jackson graphically described the defendants’ use of that corporation. Substantiation for Jackson’s concern about facts and evidence being covered up is shown by the fact that no cross-complaint was filed to recover from co-defendants Walker and Rev. Everett, misappropriated money and property belonging to the corporation.

14. It is not as if the lawyers did have ample facts and information regarding money and property that was taken from the corporation. As legal representatives for those five defendants that includes a corporation, the law firm or firms knew or should have known having a corporation as a client requires loyalty to that corporation; and any property or money belonging to that corporation should be recovered. Two pleadings from Jackson were already filed in the record [Docket entry #8 and Docket entry #15] that contained explicit, easily verifiable samples of the defendants’ acts of

redirecting funding that was awarded to the corporation, and details of various frauds committed through use of that defendant corporation.

15. **Further one of the five defendants, defendant Pittre Walker** operates her personal **for-profit** business purportedly for homeless girls at 1068 Dalzell Street in Shreveport, on property that was donated to the nonprofit corporation defendant in this suit. In addition to money defendant Walker misappropriated from the Beard Foundation that was awarded to the defendant nonprofit corporation, Walker routed resources belonging to the corporation to her personal business. Walker's for-profit Jewell House was created in year 2008. Jackson itemized in her pleadings amounts of money from the Beard Foundation that Walker acquired in the nonprofit's name, and then confiscated it from the impoverished Martin Luther King community where Jackson resides.

16. Jackson filed a motion for default on December 5, 2013 because the Shreveport Housing Authority refused to answer this suit even after Jackson effected service at two different locations. Jackson's default motion was not recorded on the docket; it was first sent to Magistrate Hornsby. It was filed in the record on December 6, 2013, almost simultaneous with the enrollment of the Smitherman Law Firm as counsel for the Housing Authority on that same day. Upon enrollment --and despite that it was already in default for failure to timely answer, like the 5 defendants, Magistrate Hornsby gave 30 additional days to plead. Also, like the 5 defendants, no reason for failing to timely answers was given.

17. When the Housing Authority filed its answer to this suit on December 23, 2013, page 13 in paragraph 4 contained the crucial statement below which corroborates: *(i)* Jackson was definitely injured; *(ii)* **Jackson's supplemental complaint** consisting of indispensable allegations and defendants **should have been filed** *(iii)* Jackson should have been afforded discovery so that the identities of "third parties" could be enjoined to this lawsuit:

**“The injuries and damages complained of were caused by the fault of third parties over whom Defendant has no supervision or control.”**

18. On January 7, 2014 a confusing and misleading memorandum from Magistrate Hornsby was mailed to Jackson. The memorandum said Jackson failed to serve Lake Bethlehem Baptist Church, and Everett. Yet Jackson did in fact, serve defendant Rev. Dennis Everett. Jackson never requested the two extra summons that were issued back in July 2013. Jackson did however request a summons for Colonia Insurance company. All that Jackson took from that January 7, 2014 memorandum was, after February 3, the magistrate would issue to Jackson “a Scheduling Order.” And according to what Jackson obtained from federal court local rules, Jackson it was Jackson’s understanding she could not begin discovery until the magistrate permitted Jackson: Jackson is still waiting to receive the “Scheduling Order” mentioned here:

Document Number: 30

**Docket Text:**

**MEMORANDUM ORDER:** Everett and Lake Bethlehem Baptist Church terminated. Plaintiffs amended complaint listed Colonia Insurance Company as a defendant, but there is no evidence that it has been served, and it has not filed an answer. Federal Rule of Civil Procedure 4(m) allows 120 days from the filing of the October 4, 2013 amended complaint to make service. Plaintiff therefore has until February 3, 2014 to file evidence of service on Colonia. If she does not, the claims against it may be dismissed. Once Colonia either files an answer or is dismissed, the court will issue a Scheduling Order that sets deadlines for the completion of discovery, the filing of dispositive motions, and other pretrial matters. Signed by Magistrate Judge Mark L. Hornsby on 1/7/14. (crt, Kennedy, T)

**CASE MANAGEMENT:** In state court, the attorney is permitted to control the pace of the litigation. In federal court, once the complaint is filed, the court takes control of the management of the case. Calendaring for scheduling conferences, status conferences, settlement conferences, pretrial conferences and trials is controlled by the Court. Informal or voluntary extensions of time between attorneys are not recognized by the Court, unless ordered or approved by the Court. If the attorneys fail to move the case, the action may be dismissed for failure to prosecute under LR41.3 (e.g. no service of process within 120 days of the filing of the complaint, or failure to join issue by answer or default within 60 days after service of process).

19. The Fifth Amendment's Equal Protection Clause directs that all persons similarly situated should be treated alike. Not only is it racist treatment of Jackson, it is both degrading to Jackson as a human being and discriminatory that all this time has passed but she has not received a Scheduling Order, and she cannot find out why –and it will probably not do any good since it appears that the magistrate has electronically enrolled a law firm who does not have to follow rules. It is virtually unheard of for Scheduling Order to not be issued in a federal civil actions, and Jackson's lawsuit is more than a year old –AND no Rule 12(b)(6) motion has been sought. A scheduling order and pursuant to Federal Rule of Civil Procedure 16(b)(1), sets deadlines for file motions for leave to amend pleadings and join additional parties. However, obviously Magistrate Hornsby **intended to ensure that Jackson never has an opportunity to amend her pleadings, nor join additional parties.**

20. (3) Even if Jackson were now allowed discovery, without Jackson's January 23 claims and without the not-yet added defendants, and with elimination of the Housing Authority, Jackson's prosecution of her case would be piecemeal and next to impossible. **In light of the fact that Jackson has been, and is being forced to prosecute her fair housing act case without indispensable defendants and indispensable factual elements that are contained in her supplemental complaint, Jackson does not have a more adequate remedy at law other than Rule 60(b)(3). Additionally, Jackson is being forced to prosecute her case without being allowed to take discovery,** even though the Housing Authority acknowledged in its December 23 answer that Jackson's damages and injuries were caused by "third parties" not yet included in this case. Hence, the denial of discovery, grant of summary judgment in light of excluded facts and information from the this case, and unconstitutional deprivation of Equal Protection demonstrates deliberate subversion of the judicial system. "When a judgment is shown to have been procured" by fraud upon the court, "no worthwhile interest is served in protecting the judgment." Restatement (Second) of Judgments § 70 cmt. b (1982).

**MEMORANDUM 1 OF 2: a Foman -Davis RUSE**  
**Fed. R. Civ. P. 15(d)**

**Setting for the “Foman” artifice**

23. The denial of Jackson’s January 23, Rule 15(d) motion for leave to file her supplemental complaint blatantly conflicts with settled law, and deprived Jackson of Due Process and **Equal Protection rights under the Fifth and Fourteenth Amendments to the U.S.**

**Constitution.** Jackson **was** treated differently from similarly-situated litigants who are promptly granted their Rule 15(d) motions to file their supplemental complaints. Further, Magistrate Mark Hornsby subverted the judicial process by creating an artifice of fabricated statements that are contained in his March 7, 2014 Memorandum.

22. Magistrate Hornsby’s artifice is malicious, odious, and even spectacular in its shrewd, use of (without citing) *Foman v. Davis* 371 U.S.178 (1962). The magistrate utilized his fabricated statements for deliberately fashioning in this instant case bogus, *Foman* criterion. The magistrate’s repugnant acts are these specific samples: (1) The Supreme Court’s holding in *Foman*: “failure to cure deficiencies by amendments previously allowed,” is a reason to deny a litigant’s amended complaint. So, Magistrate Hornsby concocted a scenario in his March 7 Memorandum to make it appear that amendments were previously allowed in this instant case. But there were never any previously allowed amendments in this instant lawsuit; and there was never anything “cured.” (2) The Court’s *Foman* holding that “undue delay,” is a reason for to deny amendment. The sole instance of “delay” described by the Magistrate Hornsby, was that three months lapsed (*because difficulty and affordability to acquire people to effect service at a church*) between the time this suit was filed and the defendants were served –notwithstanding the fact that Federal Procedure Rules allow 120 days to serve. (3) The Court’s *Foman* holding that “futility of amendment” is reason to deny an amendment. Without specifying what he meant by “futile,” Magistrate Hornsby’s

memorandum interjected that something regarding this case was futile. Yet, by March 7, the plaintiff's lawsuit was eight (8) months old, and there had been no dismissal motions filed –not even a *sua sponte* dismissal. Magistrate Hornsby **deliberately directly corrupted the impartial functions of the court by creating a first-rate artifice entitled: Memorandum Order.** It was remarkable how the magistrate covertly wove his memorandum around *Foman* without ever mentioning that case. And it is immeasurably egregiously offensive that presiding judges deliberately **abused their judicial authority for furthering and concealing rampant Shreveport, Louisiana federal funding frauds (particularly HUD money) that exploits poor and desolate, disadvantaged, defenseless people!**

23. The RUSE being laid bare here, is not a substitute appeal for denial of the plaintiff's Rule 15(d) motion. What plaintiff is showing here, is the depth of **subversion of the judicial process** engaged in by the magistrate, that is **blatant fraud upon the court.** Not only did the magistrate's contemptible acts of bending over backwards to ensure that Plaintiff Jackson had absolutely no Equal Protection rights that are guaranteed by the Constitution, the magistrate bent over backwards to violate his sworn oaths to administer justice. And when Jackson asked that the denial of her Rule 15(d) motion be reconsidered, on May 2014, the District Judge Maurice Hicks ratified what Judge Hornsby did.

24. Facts of the magistrate's appalling conduct speak for themselves. The magistrate's fraud vitiates his denial of Jackson's supplemental complaint, because that ruling unmistakably evolves from taint and prevarication. Fraud and subversion engaged in by the judges is the sole reason why Jackson's equal protection rights guaranteed by the Due Process Clause was infringed upon, when the judges imposed a restriction on Jackson, that is **not imposed on other similar-situated litigants** who file motions to supplement their pleadings with newly-acquired justiciable allegations.

25. Jackson's supplement is completely essential to this case. As stated with much detail in the Rule 15(d) motion, the January 23, 2014 supplement evolved from a November 27, 2013 telephone conversation and a follow up letter. Further, the supplemental complaint includes indispensable defendants that need to be joined to this instant case.

**a Foman Blueprint and a Contrast**

26. Magistrate Hornsby's March 7, 2014 Memorandum Order containing his **Foman-Davis artifice** commenced with the magistrate's excuse of difficulty following Plaintiff Jackson's lawsuit, and his declaration that he would **“summarize” plaintiff's ORIGINAL July 8, 2013 complaint, despite the fact that the original had been replaced by the amended October 4, 2013 complaint.** Contrary to Magistrate's false representation about needing to summarize Jackson's original July 8 complaint because of difficulty following the original, three incontrovertible facts prove the March 7 Memorandum statements were intentionally calculated for accomplishing fraud on the court:

27. Fact One. Two law firms enrolled as counsel for six defendants in this case; afterward, two more firms were added as defendants' counsels. Four firms had no difficulty following or comprehending Jackson's cause of action; and none of them found it necessary to file Fed.R. Civ.P.12(f) motions for more definite statements. Further, contained in its December 23, 2013 answer to this instant suit, defendant Shreveport Housing Authority stated: **“injuries and damages complained of were caused by the fault of third parties.”** Thus, Jackson's lawsuit was clearly not hard to follow –and clearly her pleadings stated claims for which relief could be granted!

28. Fact Two. **On October 4, 2013 --prior to service of complaint and summons on the defendants, Jackson amended her complaint, and filed a copy in the clerk's office.** Federal rules of civil procedure stipulate that **leave of court is not require** for amended complaints where service

of process has not been effected. Both Jackson's original July 8 and October 4 complaints were served together with a summons on all defendants. Due to the fact that Jackson's **October 4 amended complaint superseded her original July 8 complaint**, the salient reason why Magistrate Hornsby would announce needing to summarize Jackson's original July 8 complaint, would be for the magistrate's malevolent scheme of making it appear that Foman applied to this instant case. After singling out Jackson's obsolete original July 8 complaint and providing his untruthful "summary" discourse purportedly about that original pleading, the magistrate could then utilize the October 4 complaint for false inference of previously allowed amendments plaintiff failed to cure, in like manner as the Foman Court discussion: "**repeated failure to cure deficiencies by amendments previously allowed.**" However, **Jackson never needed to be "previously allowed" to amend her October 4 complaint because she amended it without permission, prior to service on any defendant.** There's no need to infer Jackson was previously "allowed" "to cure" anything –as if the original July 8 pleading was so flawed, it needed to be "cured." The calculated "summary" of plaintiff's original complaint wasted judicial economy –but not a waste of the magistrate's malicious purpose of executing the magistrate's RUSE.

29. Fact Three. The separating of the July 8 and October 4 complaints entailed **the magistrate's attribution of his prevaricated allegations** to the original complaint, even though his allegations are not contained in either the July 8 nor the October 4 complaints. Allegations that the Magistrate infixed into this case, after announcing his need to summarize the obsolete original complaint, was in furtherance of falsely depicting Jackson's pleadings as frivolous. The selection of the original complaint enabled the magistrate's composition of his March 7 memorandum with the magistrate's verbiage that conceals criminal activity by the defendants, while concurrently achieving an effect of non-justiciable statements that amount to little else than a lawsuit about

*“green eggs and ham.”* Consequently, the magistrate’s dishonestly attributed statements as from Jackson could give the appearance that “futility” might be applicable for this instant lawsuit.

**Jackson’s allegations were completely excluded from the March 7 memorandum; not even the fact that this is a fair housing act cause of action was revealed in his memorandum.**

**Magistrate Hornsby’s prima facie fraud on the court**

30. **Even if *Pro Se***, non-lawyer plaintiff’s July 8 or October 4 complaints were flawed, Jackson’s January 23, 2014 “Supplemental Complaint” **should have been filed in to this case, because Rule 15(d) stipulates that a supplemental complaint should be permitted “even though the original pleading is defective in its statement of a claim for relief or defense.”** The presiding judges’s actions toward Jackson were invidious, arbitrary, and capricious treatment, not imposed on other similarly-situated litigants who file Rule 15(d) motions. Also an example of liberal permission to supplement is shown where a litigant was granted its third motion for leave to supplement an amendment in ***DT Apartment Group, LP, et al., v. C W Capital, LLC, et al.***, Civil Action No. 3:12-CV-0437-D. –ND Texas.

31. The revolting display of contumely treatment toward Jackson by the presiding judges, and verbiage that the magistrate employed for his deed to obstruct the January 23 supplement from being filed, is as despicable as the course of conduct that defiles the judicial machinery itself. In Jackson’s March 18, 2014 pleading, Jackson fully delineated and defended each element of Magistrate Hornsby’s vituperative and humiliating statements --and the magistrate’s verbiage that sounded in racism, slavery Plantation, imbecile, inability to communicate, needing to be told where to live, a moronic freeloader. Judges like Mr. Hornsby are why the public, and particularly minorities have so few options except to be governed by **unjust judges**, or else repine in apathy, substance addictions, fatalism, and violence --because remedies for wrongs are nonexistent at too many courts of law --except if one has *‘a courtroom judge on one’s*

*side', rather than on the side of established law.* These passions and social concerns contributed to what Jackson had to say in Jackson's March 18 pleading.

32. Magistrate Hornsby's arbitrary, malicious subversion of the judicial process is manifest in the March 7 Memorandum that he devised through a blueprint from Foman. The facts show that the magistrate's vicious artifice was strictly for purposes of unconstitutionally depriving Jackson of her Fifth and Fourteenth Amendment rights, and to enhance the defendants ability to unlawfully prevail in this case.

#### OVERVIEW ABOUT THE PLAINTIFF

33. Jackson is a Hurricane Katrina evacuee and domestic violence victim from New Orleans. Unaware of Jimmie's criminal history, irreparable situations resulted after becoming his third wife. Court records show Jimmie is extremely dangerous. Jackson did not know he seriously injured his second wife when he deliberately pinned her to building with his car. During one of Jackson's family court proceedings, a female with whom Jimmie was apparently committing adultery, described Jimmie's alarming, reckless behavior in a petition for protective orders. Since arrival in Shreveport in 2005, for a certain, particular reason, Jackson was fearfully adamant about hiding her whereabouts from Jimmie. Thus, Jackson even kept her utilities and other matters out of Jackson's name, when possible. Once, defendant Walker provided Jackson with a written statement regarding Jackson's domestic violence worry.

34. After Jackson's family left Shreveport and returned from the hurricane, Jackson hoped church employment was possibly a new beginning. For 7 years, before ever knowing Jimmie, Jackson and her daughter were financially solvent homeowners with A-plus credit. Just prior to Hurricane Katrina, domestic violence caused Jackson to concurrently litigate in bankruptcy, family, and federal courts. Upon arrival in Shreveport, Jackson was despondent and overwhelmed because of being all too acquainted with "Louisiana way" judicial corruption, such as was described at the impeachment trial of former Judge Thomas Porteous (and the "Louisiana way" it is evident in this instant lawsuit). Jackson wrote an OpEd <http://newsblaze.com/story/20100922041842lawg.nb/topstory.html> about her

judicial court ordeals: Jackson expected she would need perhaps a year to regroup, before relocating from Shreveport where Jackson has not one relative, and legal or other meaningful employment had been impossible to obtain.

35. To Jackson's horror, Jackson did not receive the Lake Bethlehem Baptist Church (LBBC) job and opportunities that was discussed and agreed upon in September 2008 with defendant Rev. Everett; the pretend job that enticed Jackson to consent to renting a purported LBBC evacuee house. Jackson filed this fair housing suit as a result of the false job and changes in the terms of the rental agreement, persecution, intimidation, coercion, religious hostility, and other conditions that caused her to be injured, damaged, and subjected to fair housing act violations.

36. What possibly accelerated Jackson's housing problems were differing religion views, activities that were in stark contrast to the reason why Jackson was hired, and were in contrast to Jackson's proposal that she worked on during what Jackson believed was her probationary period. Also, as a financially contributing LBBC church member, Jackson saw no harm in raising questions about appearances of disproportionate youth occasions. Jackson questioned expenses for youth travel and amenities, particularly irrespective of lack of adult recreational activities, and in light of adult household expenses such as shelter, utility bills, and food. Jackson grew frustrated because she had been misled and enticed to move into the church's property, despite all Jackson wanted when she came to LBBC with her proposal, was a job. Instead, Jackson became saddled with ministry expenses, church member requests for assistance and favors, rent and utilities that Jackson would not have had; she also endured persecution, coercion, manipulation, and oppressive dictations pertaining to her residence. It did not set well with Jackson that she was without means to subsist, but meanwhile from government-funded sources, Jackson was told that Everett's niece, defendant Walker's position at Caddo Parish school justified

Everett's family members and allies being placed on payrolls at LBBC. Additionally, LBBC inequities regarding economic opportunities for the Martin Luther King vicinity was contrary to Section 3 of the Housing and Urban Development (HUD) Act of 1968.

37. Jackson's drastic financial, economical, and professional situation decline after coming to LBBC was for Jackson traumatic, as religious manipulation succeeded in camouflaging main actors who were committing appalling frauds against Jackson. All of Jackson's pleadings aver that Jackson had limited information because of fraudulent concealment. Even so, Jackson stated causes for which judicial relief can be granted. Jackson didn't even know Rev. Everett, nor the Lake Bethlehem church, nor anyone in this not so sage MLK neighborhood. Jackson did not even know how to get around. Hence, if she had not been deceived into believing she had been hired for employment, Jackson certainly would have no need, nor have no reason to agree to financial burdens in an unsafe vicinity where Jackson knew no one.

38. Also, contrary to the magistrate portrayed, what Jackson averred in her pleadings, is that she was not required to pay rent during the first six months of her probationary period –which means that Jackson (like any person on probation), worked to prove herself. Jackson's lawsuit pleadings describe Jackson's tasks, assignments, and ministry functions that Jackson did during and beyond those six months –and Jackson was never paid. Jackson did however, receive an award for outstanding church work and community service –free / without pay, as averred in Jackson's October 4 pleading. Further, Jackson used her dwelling, her resources, and purchased supplies to accomplish the work that she did. Thus, Jackson's elbow grease establishes, **not “rent free,”** but “free labor.” Also, demonstrating Jackson's financial circumstances before Jackson's probation period ended, is evidenced by samples of her cancelled check contributions to LBBC:

The checks shown below are Jackson's "tithes and offerings" to church and pastor for the month of March. (The only reason why Jackson began attending the church was because Rev. Everett led Jackson to believe Everett hired Jackson. March was the final month of a six-month probationary period that Jackson worked her proposal without pay.

\*111000036\*  
03/18/2009  
651729105

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

4002/49/ED 65100002903

BARBARA ANN JACKSON 0905 2220  
P.O. BOX 5072  
SHREVEPORT, LA 71126

3-15-09 86-4821111

Pay to Lake Bittlesden Baptist Church \$ 39.00  
Thirty-Nine

HIBERNIA National Bank  
Great is Thy Faithfulness

For Barbara Ann Jackson

⑆111104879⑆ ⑆02220⑆ ⑆000003900⑆

⑆111104879⑆ ⑆02220⑆ ⑆000003900⑆

\*111000036\*  
03/11/2009  
623651176

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

4002/40/ED 65100002903

BARBARA ANN JACKSON 0905 2217  
P.O. BOX 5072  
SHREVEPORT, LA 71126

3-1-09 86-4821111

Pay to Lake Bittlesden Baptist Church \$ 48.00  
Forty-Eight

HIBERNIA National Bank  
Great is Thy Faithfulness

For Barbara Ann Jackson

⑆111104879⑆ ⑆02217⑆ ⑆000004800⑆

⑆111104879⑆ ⑆02217⑆ ⑆000004800⑆

\*111000036\*  
04/07/2009  
651331197

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

4002/09/ED 65100002903

BARBARA ANN JACKSON 0905 2221  
P.O. BOX 5072  
SHREVEPORT, LA 71126

3-29-09 86-4821111

Pay to Lake Bittlesden Church \$ 55.00  
Fifty-Five

HIBERNIA National Bank  
Great is Thy Faithfulness

For Barbara Ann Jackson

⑆111104879⑆ ⑆02221⑆ ⑆000005500⑆

⑆111104879⑆ ⑆02221⑆ ⑆000005500⑆

\*111000036\*  
03/10/2009  
6513251439

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

4002/40/ED 65100002903

BARBARA ANN JACKSON 0905 2216  
P.O. BOX 5072  
SHREVEPORT, LA 71126

3-3-09 86-4821111

Pay to Rev. Dennis R. Everett \$ 60.00  
Sixty

HIBERNIA National Bank  
Great is Thy Faithfulness

For Barbara Ann Jackson

⑆111104879⑆ ⑆02216⑆ ⑆000006000⑆

⑆111104879⑆ ⑆02216⑆ ⑆000006000⑆

39.  
Aside  
from

Jackson's economic burdens after moving in the evacuee house, on more than one occasion someone turned on and off the alarm system to enter and exist Jackson's residence, and papers were removed; there was awful church gossip about the tenants; spiteful treatment toward evacuees; and an overall hostile environment that interfered with Jackson's fair housing rights. Also, abruptly Jackson was denied LIHEAP utility assistance at the David Raines Center where a prominent LBBC member supervises, although LIHEAP is a government program. The president of the David Raines center is Shreveport Councilwoman McCulloch's mother. Both McCulloch and her mother are members of LBBC. Jackson was systematically pressured to move out the church property even though she had no place to go. After this lawsuit was filed, Jackson learned facts demonstrating that LIHEAP discrimination was related to defendants Everett and Walker receiving federal funding pertaining to the evacuees or the houses. Also, Jackson periodically was a substitute teacher with the Caddo Parish School Board where defendant Walker and defendant Everett's wife is employed. After joining LBBC, Jackson began having difficulty with substitute assignments at schools most convenient for Jackson to travel since she no longer has transportation. Further, with religious malapropism, Jackson was repeatedly reprimanded for not acceding to her economically declining circumstances, as they worsened. Additionally, when Jackson sought jobs and interacted with other ministries, Jackson was informed that Jackson was not spoken well of at LBBC.

## **MEMORANDUM 2 OF 2: Wrongful Summary Judgment Fed. R. Civ. P. 56**

40. The facts and proof in Memorandum 1 of 2 underpins the following proof of unconscionable acts **calculated to interfere with the judicial system**, and deliberate hamper plaintiff's presentation of her claims. Also, it was a violation of Jackson's Due Process and Equal Protection rights to deny Jackson any

opportunity whatsoever to take discovery prior to summary judgment dismissal.

41. As it pertains to motions for summary judgment, "A dispute is genuine if the evidence about the fact is such that a reasonable jury could resolve the point in the favor of the non-moving party." *American Steel Erectors, Inc. v. Local Union No. 7, International Association of Bridge, Structural, Ornamental & Reinforcing Iron Workers*, 536 F.3d 68, 75 (1st Cir. 2008). Also: "Procedurally, the party moving for summary judgment bears the initial burden of informing the district court of the basis for its motion, and identifying those portions of the record which it believes demonstrate the absence of a genuine issue of material fact." *Taita Chemical Co., Ltd. v. Westlake Styrene Corp.*, 246 F.3d 377 (5th Cir. 2001)

42. The Shreveport Housing Authority defendant who moved for summary judgment must point to specific portions of the record that support the presence (or absence) of a genuine issue of material fact. However, when the plaintiff, in this case, Jackson is prohibited from any discovery of any defendant, and material allegations and information such as material facts contained in Jackson's January 23, 2014 supplement complaint, unjustly impeded Jackson from a fair chance to oppose summary judgment. When fraud on the court and unconstitutional obstruction unfairly impeded Jackson from filing material information in her case, it is not likely to prove the existence of genuine issues. For such reasons Jackson maintains there is no question that the outcome of Jackson's entire case would be different if subversions of the judicial process had not occurred. Jackson is also certain that the outcome would be different if Jackson were not impeded from

taking discovery –and if trickery, deceit, intentional misrepresentation, concealment, and nondisclosure were not so pervasive in this instant litigation.

43. The outcome of this case also would be completely different if on January 23, Jackson's supplemental complaint had been filed in the record of this case; and if Jackson been allowed to serve her requests for admissions and Interrogatories on the indispensable parties that have been prevented by the judges from being joined to this civil action as a result of Jackson's January 23 supplement unconstitutionally excluded from being filed. As already mentioned, even the Housing Authority confirmed that Jackson was damages by "third parties." **The injuries and damages complained of were caused by the fault of third parties over whom Defendant has no supervision or control."**

44. Aside from the undeniable fact that the Housing Authority confirmed that Jackson did indeed suffer damages and injuries, and those injuries were caused by "third parties" who were clearly not yet parties to this instant case, further proves that summary judgment dismissal of the Housing Authority without the benefit of discovery violated Jackson's Due Process rights. Moreover, the manifest subversion of the judicial process overwhelmingly shows that Jackson has never had **the benefit of a fair trial in a fair tribunal.**

45. Discovery of the Housing Authority was essential for learning identities of the "third parties," but also to discover from the Housing Authority why Jackson was discriminated against regarding Hurricane Katrina disaster assistance, known as KDHAP.

Jackson submitted with her opposition to summary judgment, overwhelming proof to show that Hurricane disaster assistance was indeed supposed to be provided to evacuees including Jackson. Jackson had not fathomed that the court would refuse discovery since none had ever occurred. And Jackson is still learning from the Internet about KDHAP. In fact, Jackson learned that former **evacuee neighbors two doors away from Jackson, who were also tenants managed by defendant Walker, received KDHAP, yet Jackson did not.** Summary judgment dismissal was granted because of **unconscionable fraud upon the court that was calculated to interfere with the judicial system itself;** and it was **intentional to discriminate against Jackson;** and to prevent presentation of her claims.

**46. An adequate remedy at law Jackson does not have** --and time is running out for Jackson in her dangerous, hostile living environment. On Jackson's one block street, there have been eight home invasions. Also, approximately four months ago in April 2014, a preacher from Lake Bethlehem church entered Jackson's residence. Between 2008 and 2009 when Jackson first moved in, there were numerous times when someone came and went into her evacuee dwelling. Several days ago, on August 28, 2014 a theft occurred next door at the defendants' property. It was Jackson who stopped the thieves and called the police; defendant Washington also arrived. (The thief threatened Jackson approximately a month prior to that, three days ago, Jackson identified the thief on the defendants' behalf.) The neighborhood is dangerous, and the thieves whom Jackson identified for police know where Jackson lives.

47. Jackson's request for default judgment against the Housing Authority was not filed until the next day of Jackson's bringing her petition to the clerk's office. On the day it was filed the Smitherman Law Firm, enrolled as counsel for the Housing Authority and was granted additional time to plead -after the fact of default. Jackson's research on defendant Walker led Jackson to find out about the Smitherman Law Firm's homeless nonprofit affiliations. It seems suspect that the magistrate's memorandum glossed over the defendants' nonprofit activities, and included a theme in his memorandum to give an appearance of well-meaning defendants providing shelter to Jackson -but the magistrate eradicated Jackson's graphic fair housing allegations, breach of contract of employment, violations of Section 3, and so on. It also appears that Magistrate Hornsby attempted to whitewash Jackson's allegations about the defendants' fraudulently obtaining the \$560,000 that was used to build the so-called evacuee houses; and the fact of Jackson's allegations that even after so many bygone years after Hurricane Katrina --as late as year 2012, the defendants were still receiving funding from the city of Shreveport. (Jackson is the only remaining evacuee in the houses.)

**48. Emphatically, defendants Rev. Dennis Everett and Pittre Walker do not, operate a shelter facility at the four houses -and Jackson was never homeless. If they are receiving funds under pretense of housing homeless tenants, none of the tenants know anything about such funding and are not complicit in any homeless fraud.** Further, among things for which Jackson asserts in her pleadings she is outraged, is that she has reason to believe her Constitutional right to privacy was violated, when against Jackson's will, and without Jackson's knowledge, someone entered Jackson and likely Jackson's daughter in a **homeless management information system called HMIS**. The HMIS system is necessary for acquiring homeless funding. Magistrate Hornsby appears to be attempting to justify Jackson being fraudulently put in HMIS, and possibly

Jackson's suspicions are accurate, which is why she is being impeded from discovery to learn identities of who has indeed received or is receiving federal funds by means of Jackson's and possibly her daughter, and even Jackson's deceased mother's name. In light of what found out about Walker's Dalzell Street affairs, and the bogus landlord lease Walker created, and in light of the facsimile transmissions Jackson sent to the Homeless Education Enhancement Department (HEEP) at the Caddo Parish School Board, Jackson suspects that person was, or is Pittre Walker – someone Jackson trusted emphatically.

50. Jackson was never homeless, but defendant Walker is renown throughout the city of Shreveport and much of Louisiana as the Caddo homeless coordinator, and –in conflict of interest, Walker's shelter provider at her **for**-profit company called "Jewell House" that Walker founded, but Walker's company is not registered as a nonprofit. Thus, grants and funds that Walker obtains from the Beaird Foundation and other places is probably misleading since it's preferable to award grants and funding to nonprofits NGOs. Walker's job position at the Caddo Parish School Board Education for Homeless Children and Youths and the McKinney-Vento program also clearly involves homelessness. **Yet Jackson does not have / never had any children that attend any Caddo school.** Therefore, Jackson would never have a reason to be in a HMIS system operated by Caddo Parish School nor Centerpoint nor HUD. **It makes a little more sense why Walker created a bogus back-dated October 2008 landlord lease for Jackson to sign despite that Walker was not Jackson's landlord. Walker's lease is attached as an exhibit to Jackson's October 4, 2013 amended complaint.** It remains for Jackson to learn how Walker utilized that bogus lease.

51. It could also be possible that Jackson was unlawfully entered in HMIS through the following method. Jackson recalls that in 2006 and 2007, it was the "Centerpoint Community Services" (Centerpoint) referral services that steered evacuees to Pittre Walker. Jackson was sent to 1134

College Street, but Jackson was unaware of Walker until much after the fact. Hurricane Katrina evacuees who called “Louisiana 2-1-1” to seek resources, were routed to Centerpoint at 1002 Texas Avenue in Shreveport. Evacuees like Jackson did not know entanglement with Centerpoint meant automatic entanglement with an organization called “HOPE for the Homeless” (HOPE).

52. During 2006 and 2007, Terri Brock Axelson represented herself as the executive director for HOPE; and Liz Swaine, the Smitherman Law Firm, and defendant Pittre Walker were federated with Centerpoint. Walker also is one of HOPE’s board of directors, and so is Richard Herrington, the executive director of Shreveport Housing Authority. Jackson went to Centerpoint because it advertised itself as a: “referral for human services including; housing and/or shelter, healthcare / prescriptions, food distribution, utility assistance, and crisis intervention.” Centerpoint did not advertise itself as a homeless service facility; and had it done so, Jackson would not have gone for there since Jackson was not homeless. The 86-page “Continuum of Care” document evidently submitted by Terri Brock Axelson, attached as an Exhibit indicates Centerpoint and HOPE for the Homeless were one in the same.

53. **In light of what Jackson has discovered about Walker** and the two combined nonprofits –of which Centerpoint is reportedly on a hiatus , probably until another disaster creates influx of federal funds and victims it sometimes time that disadvantaged, homeless, mentally challenged, and other handicapped Shreveport residents are federal funding commodity –and that’s appalling! Astonishingly not until long after filing this lawsuit, Jackson was unaware how prominent Pittre Walker was, in terms of being connected to practically every local and national organization that impacts homelessness and poverty. Meanwhile **Jackson submitted proposals and suggestion for impacting homelessness, depression, loneliness, poverty, violence, family disharmony, mental distress, illiteracy, child support / child custody legal matters –particularly in the Martin Luther King (MLK)**

community where Jackson resides, were unwelcome despite glaring needs in this vicinity –unless Jackson used her own funds and resources. Those facts are among the reasons why it was noticeable to Jackson that the dummy nonprofit had been utilized to obtain thousands of dollars from the Beaird Foundation and routed to Walker’s Jewell House --away from the MLK community where the dummy nonprofit is located, and despite the lack of “community” voice regarding money and resources obtained by its “community development corporation.” Resources are not to be controlled by one person as if it is her personal funds –especially when Walker’s personal company is a **for-profit**

## Welcome To Jewell House

Jewell House is a program under Youth Outreach Services. Youth Outreach Service is a 501(3)c non-profit organization providing Guidance and Direction for youth.  
The right steps in the right direction!

Transitional Living Facility with  
Care. Hope. Change

[Donate](#)

Pittre Walker~ Executive Producer  
(318) 603-6380 Fax: (318) 429-6594 Jewell House  
1068 Dalzell Shreveport, LA 71104  
Office Hours:9 a.m. to 5 p.m. Monday – Friday

business under a different nonprofit, Youth Outreach Services, according to its website!

54. And, a similar pattern seems to have existed or still exist for operations involving Centerpoint and HOPE for the Homeless –meanwhile Department of Housing and Urban Development (HUD) funds to HOPE appears to make it financially beneficial for HOPE for people to be homeless, destitute, mentally distressed, broken households, and so! An investigation, and an overhaul of Centerpoint and HOPE for the Homeless organization is truly needed –particularly, since clearly board members Pittre Walker and Shreveport Housing Authority executive, Richard Herrington have

conflicts of interest as it pertains to disadvantaged people residing in Shreveport! Further, that conflict is alarming when federal judges support unlawful, unconstitutional acts that injure people and causes people to endure years of unjustified gentrification, such as Jackson Heights and Ledbetter, while massive amounts of HUD dollars are misspent, instead of addressing conditions of gentrified people who have been disenfranchised, in many instances, through no fault of their making.

55. It almost appears as if homeless, mentally distressed, disadvantaged people residing in Shreveport are nonprofit commodities –and that is appalling! The dots now connect, as another word for Shreveport could be “Plantation.” Further, it definitely seems as though because Jackson probed too much into how to be a solution to social problems, and Jackson accidentally stumbled into Walker’s and Everett’s Caddo School improprieties, Jackson was made a victim and subjected to outrageous and unfair housing act wrongs. Jackson also probed and questioned about so-called City of Shreveport “inspections” at Jackson’s dwelling that Jackson thought were done by the Housing Authority, and Jackson somewhat insisted on an explanation (*but she never received*) for why and how Jackson was being reprimanded for not complying with HUD rules, in light of Jackson’s certainty that she is not a HUD recipient.

56. As mentioned, the Texas Avenue location for Centerpoint is where Jackson went for services years ago. Jackson was steered to 1134 College Street, because Jackson was informed if she wanted Centerpoint assistance, Jackson was **required** to go to that College Street tutoring site. Jackson was not given copies of what she signed; the copier was malfunctioning so she was told, and she would be given copies later –it never happened. Rather than Centerpoint steering Jackson to what could allow Jackson to gain some semblance of her hurricane-destroyed life, which was the reason

why Jackson went there in the first place. looking back it appears that Centerpoint, and or HOPE steered Jackson to 1134 College Street so that Walker and **the person in charge, Hettie Hobdy,** could take turns gaining whatever federal and or state funds existed for hurricane evacuees. Jackson was never certain what she was supposed to do there, but Jackson was paid \$40.00 per visit, until abruptly Hobdy was either no longer at the tutoring location, or no one answered the site telephone. Jackson had no idea that Hobdy was employed in the Shreveport “economic development department” until approximately August 2014.

57. Approximately two years later after the tutoring stint, Jackson did observe Hobdy in the LBBC church parking lot. Several month ago, Jackson discovered that the 1134 College Street tutoring site was run by City of Shreveport “economic development department,” employee Hettie Hobdy. Jackson had no way knowing it, but approximately eight years ago (attached as exhibit), Hobdy’s position was the city “Bureau Chief.” Jackson thought Hobdy was some sort of “consultant” for churches. Hobdy did, however several times attempt to get Jackson to use Jackson’s Law & Grace ministry [www.lawgrace.org](http://www.lawgrace.org) to go in to some business, but Jackson disliked Hobdy’s suggestions.

58. As Jackson continued recalling facts about Walker and Centerpoint’s steering Jackson to that tutoring site, Jackson compared addresses, and discovered that 1134 College address is **now the address of a homeless nonprofit where defendant Rev. Everett is the vice president.** Jackson recalls cautioning Everett about mixing money that was collected for ‘Grace House’ (its legal name is “Grace Community Outreach”). Correlating the fact of the College Street homeless shelter with the fact of Jewell House and the year 2005 donated property, it is apparent that Magistrate Hornsby’s March 7 memorandum had definitive reasons, even if Jackson does not know those reasons, for falsely implying Jackson was a homeless person whom the defendants

provided shelter. It is further apparent that the contents of Jackson's January 23, 2014 Supplemental Complaint would have defeated the magistrate's **fraud on the court** agenda.

59. Facts and issues pertaining to the \$560,000 dollars that was obtained by fraud to build the so-called "rent-to-own" evacuee houses would not be Jackson's concern, if it were not for the fact that, under false pretense of employment, Jackson was lured to the one of the four *make believe* "rent-to-own" evacuee houses. Thereafter, as a result of agreeing to be a tenant at the evacuee house, Jackson was subjected to unfair housing violations. **Jackson's cause of action stems from the fact that the defendants used Hurricane Rita and Katrina evacuees in their scheme for fraudulently obtaining federal money that they were never entitled. Under pretense of building rent-to-own houses for evacuees, but no evacuee received one –and the City of Shreveport "economic development department" appears to have repeatedly given funds to the dummy nonprofit corporation.** Jackson suffered damages and injuries as a consequence of being deceived into consenting to move in one of those evacuee houses. But Jackson never sought the houses; she never knew the houses existed, until through deceitful enticement of employment, she was deceived into becoming a renter.

60. Additionally, as fully discussed in Jackson's January 23, 2014 Rule 15(d) "Supplemental Complaint," because HUD "HOME" funds require "CHDO certification," it never was lawful to have awarded "HOME" funds to the illegitimate dummy nonprofit corporation, because the dummy corporation **never qualified as a CHDO.** Jackson would have not become injured if illegitimate CHDOs were not established.

**List of Exhibits Attached to this Rule 60(b)(3) Motions Pleading:**

1. Federal Registry document proving Shreveport Housing Authority participated in Hurricane Katrina Disaster Housing Assistance Program
2. Google online search showing “Centerpoint Community Services” participated in Hurricane Katrina Disaster Housing Assistance Program
3. Page 1 of 86 pages pertaining to “Continuum of Care” CoC document from “HOPE for the Homeless” \ Centerpoint –submitted by Terri Brock (\*this full document includes the Smitherman Law Firm)
4. “Centerpoint Community Services” -request for funding abstract (the funding request contains the names of Terri Brock, Liz Swain, and Smitherman Law firm)
5. HOPE for the Homeless and Caddo Parish School Board HEEP director (names shown: Terri Brock, Pittre Walker)
6. City of Shreveport: request for organizations to become certified as CHDOs (*so they can be conduits for funneling HUD \$*)
7. City of Shreveport: request for proposals – Bonnie Moore only CHDOs that have been “certified by the city”
8. City of Shreveport –2007 operating budget, Bonnie Moore / Hettie Hobdy-bureau chief (Youth and Elderly Services, Hurricane Katrina, MLK. . .)
9. City of Shreveport –2007 operating budget, Bonnie Moore /Hettie Hobdy \*Community Block Grant, HUD “HOME” funding, “Emergency Shelter Grants”
10. City of Shreveport –2007 operating budget, Bonnie Moore / Hettie Hobdy “ACCOMPLISHMENTS”

WHEREFORE, Plaintiff Barbara Jackson requests that, based on the foregoing, her Rule 60(b)(3) motion to vacate the March 7, 2014 order be granted; and her January 23, 2014 Supplemental Complaint be filed into the record of this instant case; and that Jackson’s motion pursuant to Federal Rule of Civil Procedure

60 (b) (3), requesting that the dismissal to Housing Authority of Shreveport be reversed.

Dated: September 9, 2014

Respectfully submitted

---

Barbara Jackson

[REDACTED]  
Shreveport, LA [REDACTED]

**AFFIDAVIT**

So help me God, I declare under penalty of perjury, in accordance with 28 U.S.C 1746, that the foregoing statements and evidence are true and correct, based upon knowledge I have personally acquired concerning all of defendants and parties named in this Fair Housing and Civil Rights cause of action.

This 9th day of September, 2014.

---

**Certificate of Service**

I certify that a copy of the foregoing Motion For Leave To File Supplemental Complaint with Supporting Memorandum, and proposed order was served this 9th day of September, 2014 by first class mail, postage prepaid, on counsel for defendants.