

UNITED STATES DISTRICT COURT OF WESTERN WASHINGTON

**18 CV**

**1252-RAJ**

Andre Hoskins

CASE NUMBER

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LOGGED

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Plaintiff

COMPLAINT

AUG 24 2018

DJ

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY  
BY

42 U.S.C. Section 1983

42 U.S.C. Section 1985

Civil Rights Act of 1866

Against

American Disability Act of 1990

**Demand for a Jury Trial**

American Civil Liberties Union Foundation,  
Seattle Office for Civil Rights, City of Seattle,  
and Seattle Public Library, Teresa Selfe, also  
in the capacity of her individual person, and Priya Wilson,  
also in the capacity of her individual person.

Defendants

**NATURE OF ACTION**

Comes Now the Plaintiff, appearing Pro Se, and for the causes of action against Defendants state as follow in this 42 U.S.C. Sections 1983 and 1985 Civil Rights action against the Defendants

SEA 92105  
Sliss

for violations and intentional deprivation of Plaintiff guarantee constitutional rights of the 1<sup>st</sup> Amendment that is guarantee by the United States Constitution. All of the Defendants listed here in this lawsuit have no authorization, no power, or legal right to deprived the plaintiff of any guarantee rights that is given by the United States Constitution, and all of the defendants listed in this lawsuit did their illegal discriminatory acts and deprivation of plaintiff guarantee civil liberties under the 'color of law,' therefore the "plaintiff claims" that are arising out of 42 U.S.C. Section 1983 and 1985 due to the deprivation of guarantee civil rights given to the plaintiff by the United States Constitution have merit claims and plaintiff can sue the Defendants lawfully through those claims with the full weight of the Civil Rights Act 1866, bringing forth valid claims where the guarantee civil liberties are protected by the United States Constitution, the defendants listed here in this action did their intentional illegal conduct of discrimination toward the plaintiff based on the plaintiff black skin, plaintiff based his claims for damages to be awarded to the plaintiff that "all of the defendants" deprived plaintiff of guarantee civil rights because of race. Prerequisite to that deprivation of 1<sup>st</sup> Amendment rights, the plaintiff claimed that Defendant Seattle Public Library Security personnel, acting under the authority of Defendant SPL also intentionally subjected the plaintiff to additional deprivation of guarantee civil liberties without just cause or supporting evidence to any wrongdoing, the Defendant SPL violation of plaintiff' rights under the Fourth Amendment to the United States Constitution to be secure in his person against unreasonable seizure, and a right to due process under the Fourteenth Amendment. The SPL officers, under the authority of Defendant SPL presented threats, discriminatory and maliciously and oppressively presented themselves to cause injury to the plaintiff, and emotional distress, and reason for fear to plaintiff well-being and safety, and the hostile action was due to the plaintiff black race. The SPL officers detained and then escorted the plaintiff from the use of Public Accommodations where the plaintiff race was the initiating primary factor for such action because the evidentiary fact existed that there is and was no

evidence that the plaintiff did any harm; where Defendant SPL officers have a sordid discriminatory history of violating federal law and conducting illegal action against people of color; quoted and confirmed by Defendant Seattle Public Library very "own" Security personnel in a previous discriminatory suit that was brought by SPL "women" security officers of color, were quotes were confirmed that racial slurs and targeting blacks with threats of expulsion and carrying out such threats without due process. That federal suit was brought in Western District of Washington (August 2016), and the very statements of SPL security personnel in that lawsuit confirms exactly what the plaintiff is telling the court that a discriminatory system is in place in Defendant SPL environment that targets blacks. Defendant SPL security violated the constitutional rights of the petitioner VERIFIED by the use of their "own" surveillance tapes, where the tapes were in total conflict to an uncorroborated accusation that was intentionally based on the plaintiff black skin. Defendant SPL knew at all times that plaintiff did nothing wrong, but intentionally carryout their discriminatory means and deprivation of plaintiff guarantee civil liberties because of plaintiff black race. Plaintiff contacted Defendant ACLU on or about May 15, 2018 to seek legal assistance and the plaintiff made numerous attempts to get ACLU help, and repeatedly explained the discriminatory issues set forth in this complaint to the ACLU that plaintiff race was the primary fact for the discrimination by Defendants SPL, Selfe, Wilson, Seattle Office for Civil Rights, and City of Seattle, all acting under the 'color of law' in Washington State but instead of assistance, the ACLU basically said, "you are a nigger, therefore justifying and confirming the actions of the Defendants, protecting your civil rights and the rights that you perceivably think you have are nonexistent and do not matter to the ACLU, a sense of discriminatory, and white institutionalized racism came forth. Including, the ACLU collaboration to conspired with others to 'suppress' the plaintiff in every conceivable way from bringing forth a valid claim, especially when the plaintiff petitioned the ACLU and there was supporting evidence that exposed their "Friends of the Library" network. Therefore plaintiff

42 U.S.C. 1983 and 1985 claims move forward because the ACLU was basing their actions on plaintiff race to protect the 'white institutionalized' mechanisms in place and the people of authority, Defendant City of Seattle and the Mayor Office. Defendant ACLU does not have a nonpartisan position toward Civil Rights, as everyone assumes to believe, but Defendant ACLU has a discriminatory mechanism in place based on race in complete discriminatory hypocrisy of the ACLU mission, and Defendant ACLU maliciously and intentionally used their "white institutionalized" patterns to suppress Plaintiff 1<sup>st</sup> Amendment rights to petition the ACLU regarding guarantee 1<sup>st</sup> Amendment rights, and for the assistance in protecting those rights when petitioner lawfully petitioned the ACLU about the discriminatory conduct by several defendants, that was supported by Defendant Seattle Public Library video surveillance. Relief is warrant under 42 U.S.C. 1983 pursuant to a specific constitutional guarantee that is safeguarding the interest that defendants have alleged illegally trespassed upon and have no legal authority to take away plaintiff civil rights. The very weight of Civil Right Act of 1866 facilitates the claim to bring action of 42 U.S.C. 1983 and 1985 for violation of plaintiff civil rights because clearly plaintiff is in a protected class. All of the Defendants have knowingly done this harm of deprivation of civil rights intentionally and shockingly due to the plaintiff black race. Plaintiff has an identifiable protected constitutional 1<sup>st</sup> Amendment right and that 1<sup>st</sup> Amendment right has been totally violated. Actions of 42 U.S.C. 1983 and 1985 for alleged conspiracies involving private parties and federal officers are recognized only when the conspiracy also involves local officials since actions of the government and its officers lie beyond the purview of 42 U.S.C. 1983. D.C. Circuit, *Thomas v. News World Communications*, 681 F. Supp. 55 (D.D.C. 1988). There is prima facie discrimination present, plaintiff is in a protected class (race and disabilities), and the defendants actions were intentionally done, and there is a causal connection between injury and defendant conduct of purposeful discrimination based on plaintiff black race, where the defendants racial animus against blacks is what Congress intended to protect

therefore there is a right to sue and lawful standing for the direct and indirect injury. Plaintiff also asserts that the Defendants discriminatory means were also because of the plaintiff's disabilities, and deprivation of any rights, privileges, or immunities secured by the United States Constitution and laws, liberties illegally taking away by the defendants purposeful conduct makes the defendants liable to the plaintiff in an action of law, for proper proceeding for redress to the also intentional trespass of using their "white institutionalized mechanisms and racists beings" to retaliated by discriminatory means, overt racism, threats, and racist' coercion against the black plaintiff in a discriminatory manner that the defendants harmful conduct was based on "race" in total deprivation of guarantee liberties upheld by the United States Constitution. The civil rights lawsuit seeks to protect the plaintiff "right to petition" intentional racism inflicted upon his person that is at the pinnacle of the First Amendment, and to allow the petitioner to address and engage in free speech at the heart of the First Amendment to petition the defendants discriminatory acts and contest the unconstitutional discriminatory retaliation for being black and for the plaintiff to present a lawful petitioned that exposed the "racists beings" who are working within the public' scope in the City of Seattle, and its municipal government of "white institutionalized arenas," under the 'color' of law' in Washington State. One of the main points of the United States constitutional democracy is the right to be free from prior restraint or retaliation for engaging in protected expression. Defendant ACLU has intentionally went outside it scope with deliberate racial indifference to the plaintiff of legitimate claims and petition and the ACLU core mission: "is to defend and preserve the individual rights and liberties guaranteed to every person in this country by the Constitution and laws of the United States." Defendants created a constitutional tort, 42 U.S.C. 1983, petitioner identifies repeatedly the 1<sup>st</sup> Amendment, 4<sup>th</sup> Amendment, and 14<sup>th</sup> Amendment are protected guarantee rights given to the plaintiff by the United States Constitution, that "all of defendants" has violated plaintiff' rights, and the Defendants have no authorization or power to do so, and plaintiff is seeking compensatory and

punitive damages, because the plaintiff can prove that the discriminatory action and unconstitutional action of deprivation of civil liberties was the cause in fact of plaintiff injury, because of his black race. Petitioner, cause of action of 42 U.S.C. 1983 straightforward point to the Defendants discriminatory conduct was under the "color of law" in Washington State and plaintiff identified the deprived guarantee civil rights by the defendants who created a constitutional tort. The degree of reprehensibility of all of the defendants conduct in this complaint is great.

### **JURISDICTION AND VENUE**

This Court has subject matter jurisdiction of these claims pursuant to the Civil Rights Act 1866, 42 U.S.C. Section 1983 et seq; the Judicial Code, 18 U.S.C. Section 1331 and 1343(a); and the 1<sup>st</sup>, 4<sup>th</sup>, and 14<sup>th</sup> Amendments of the United States Constitution.

### **PARTIES**

Plaintiff Andre Hoskins is a resident of Washington.

Defendant Seattle Office for Civil Rights, is a civil rights office that is a division of the City of Seattle, but claims separatism and neutrality. The Defendant SOCR, acted under the color of law to this 42 U.S.C. 1983 and 1985 action. The SOCR can be served process at 810 Third Ave., Suite 750, Seattle, WA 98104.

Defendant City of Seattle is a city and municipality organized under the laws of Washington State. The City of Seattle representing the City of Seattle, who acted under the 'color of law' to this 42 U.S.C. 1983 and 1985 action can be served process at City Attorney's Office, 701 5<sup>th</sup> Ave., Suite 2050, Seattle, WA 98104.

Defendant Seattle Public Library is the City of Seattle Library, who acted under the 'color of law' in Washington State, to this 42 U.S.C. 1983 and 1985 action can be served process at register agent, Seattle Public Library Foundation, Jeff Guddat, 1000 4<sup>th</sup> Ave 11<sup>th</sup> FL, Seattle, WA 98104.

Defendant American Civil Liberties Union Foundation, a 501(c)(3) nonprofit organization, the United States nation's guardian of liberty, to defend and preserve the individual rights and liberties that the Constitution and laws of the United States guarantee everyone in the U.S. The ACLU acted under the 'color of law' to this 42 U.S.C. 1983 and 1985 action. The ACLU can be served process at 901 Fifth Ave. Suite 630, Seattle, Washington 98164 or be served process at ACLU Corporate Office, 125 Broad Street, 18<sup>th</sup> Floor, New York, New York 10004.

Defendants, Teresa Selfe, in the capacity of her person. Resident of Washington State. Priya Wilson, in the capacity of her person. Resident of Washington State. 42 U.S.C. 1983 and 1985 action comes forth. The employees of Defendant City of Seattle, also acted under the "color of law" in Washington State and in the scope of their employment relevant to this 42 U.S.C. 1983 and 1985 action. They may be served with process at Seattle Public Library at 1000 4<sup>TH</sup> Ave, Seattle Washington 98104.

### **FEDERAL QUESTION**

Do Defendants have the legal right and authority to strip the plaintiff Andre Hoskins of constitutionally civil rights that are guarantee by the United States Constitution?

### **FACTUAL ALLEGATIONS**

At the heart of the matter before the Court is Defendant Seattle Public Library surveillance videotape. The authentic tape is in possession of the plaintiff and the Defendants, and the source comes directly from Defendant SPL. On August 26, 2017, Defendant Teresa Selfe, of white race intentionally and falsely accused black Plaintiff of assaulting her and intimidating her. The videotape clearly showed that Defendant Selfe outright fabricated the whole scenario because of the plaintiff black race. In fact, Plaintiff race was the issue the entire time. Defendant Selfe and Plaintiff had never ever met. The Defendant SPL surveillance videotape clearly shows that there is absolutely no confrontation of any kind, Defendant Selfe very "eyes of contact" are fixated on her computer "the entire time" because of the fact that her computer freezes up, the plaintiff did no unlawful wrongdoing, and if switching to the next working register is a crime then SPL has a problem. Defendant SPL problem now is serious because Defendant Selfe not only used defamatory statements to support her discriminatory actions due to the plaintiff black race to her employer SPL, but her written physical description of the events did not match the surveillance videotape where Defendant Selfe tells the world and her employer, the Defendant SPL that plaintiff assaulted her and caused injury. Selfe explanation was a farce. There was no physical contact and most certainly no screaming, because surrounding patrons and SPL employees clearly display through all visual effects, Selfe is lying. And Defendant SPL knew this fact, but carry out their discriminatory conduct because of plaintiff black race and enforced an expulsion on absolutely no legitimate grounds to support such action other than the plaintiff black skin. Defendant Seattle Public Library have a documented "unchallenged" discriminatory history of targeting blacks for "exclusion" of their facilities because of race and that exclusion for those unsuitable purpose is in violation of all Public Accommodations laws and federal laws (and minorities who have been faced with such discriminatory actions are willing to step forward upon filing of this lawsuit to show the Court the seriousness of the racial issue and the illegal discriminatory conduct here that is supported by "white institutionalized



racism” in direct conflict of federal law where the SPL surveillance video tape clearly exposes, not only the racism that took place by the defendant SPL employees but also exposes the discriminatory mechanisms in place to illegally protect the discrimination to thwart any legal right to petition that is guaranteed by the 1<sup>st</sup> Amendment of the U.S. Constitution. Therefore the defendant’s intentional discriminatory and injury of conduct based was based on the plaintiff black race by Defendants Seattle Public Library, City of Seattle, Seattle Office for Civil Rights and The ACLU. Many of the blacks who are “illegal subjected” to exclusion by SPL do not have the resources to fight back nor the legal connections, and SPL knows this fact, by targeting black race, in total violation of guarantee civil liberties and federal law). On December 16, 2017, Plaintiff files against Defendant City of Seattle to the City of Seattle department, Claim For Damages of \$3,002. On February 13, 2018, Plaintiff filed a complaint with Defendant Seattle Office of Civil Rights with the intent of recovering \$3,002 in legal fees in defending a racist issue where there was no police, court or law involved, an issue where Defendant SPL deliberately made the Plaintiff and others to believe that the plaintiff had committed a crime, and Defendant SPL knowingly knew that was not true, and the Defendant SPL knowingly and intentionally conducted an retaliation and exclusion from the use a Public Accommodation because of the plaintiff black race and disabilities, especially when Defendant SPL knowingly had physical technological evidence in their possession, and “that videotape technology revealed ‘the truth’ to Defendant Teresa Self racist accusation in SPL facilities and that videotape clearly exonerated the plaintiff 100%. Plaintiff mother was dying at the hospital, plaintiff “only concern” was his family and not the discriminatory issue that was taking place, plaintiff hired a law firm Blair and Kim to handle the situation, and through the recovery of the Defendant videotape the truth came front and center. There was no violation by the Plaintiff in any conceivable way. There was no crime committed. Defendant SPL Security knew this fact, but conducted their illegal act under the orders of Defendant SPL management (October 1, 2018) to

continue the discrimination because of the plaintiff black race, basically confirming the words of the United States Supreme Court Justice Sotomayer, "It says that your body is a subject of invasion while courts excuse the violation of your rights. It implies that you are not a citizen of a democracy but the subject of a carceral state, just waiting to be cataloged." In fact the Defendant Seattle SPL has a discriminatory history and repetitive pattern of targeting blacks and other minorities and expelling them from use of Public Accommodations, and the pattern is based on "race" that is "arbitrary and capricious" policies that stain federal and state laws, even to the point that does not allow victims of discrimination to appeal without outright retaliation coming to the front. So true is this fact, that Defendant Priya Wilson, in total disregard to 42 U.S.C. 1983 and 1985, and civil rights, and disability law intentionally carried out a discriminatory objective due to her past racist beliefs and past discriminatory conduct toward Plaintiff. Defendant Wilson continues the discrimination to hide "her own discrimination" to intentionally collaborate through conspiracy to her employer by falsifying in a written statement about the plaintiff and Wilson knowingly knowing that there is no surveillance videotapes that can back up her account, and such reference was made during an investigated phase of the Selfe incident. And yet, Defendant SPL has cameras throughout and outside their facility. Defendant SPL "seizes" this as an opportunity to cover-up Defendant Selfe false accusation and retaliated and used Defendant Priya Wilson racial and discriminatory antics to punish the plaintiff for an issue to "cover-up and support" the racist August 26, 2017 issues of Defendant Teresa Selfe, to intentionally build a case against the Plaintiff. Where in fact, it was the Plaintiff who petitioned Defendant SPL "first" on the Defendant Priya Wilson issue of discrimination due to the plaintiff black race and disabilities (Plaintiff petitioned SPL management about 5 hours after Defendant Wilson racist and discriminatory acts), and once again, Defendant' Seattle Public Library fails to provide any videotape of any kind to support their employees claims (Wilson and Selfe), and yet "all security surveillance videotapes" clearly support the Plaintiff, the very log

book of SPL incidents and “SPL security team physically on camera” will not even match the SPL cameras on the Wilson incident because plaintiff did no wrong, and there is no tape of SPL security approaching the plaintiff that could collaborated Defendant Wilson by Defendant SPL own security protocol, but SPL punishes plaintiff anyway because of his black race and “THEN” there are videotapes that Defendant SPL intentionally and maliciously ‘did not provide’ to the hired law firm that investigated Selfe and Wilson false claims, and the investigation concluded and told the complete picture of Defendant SPL illegal actions and false reports, where the plaintiff is completely exonerated. In other words, Defendant SPL has absolutely no videos of Plaintiff breaking no laws, Plaintiff conduct was no different than any other patron, and yet Defendant has cameras throughout and outside the facility, cameras are on every floor. The Defendants Wilson and Selfe incidents, have severe video inconsistencies in “their” written statements and the very reactions of numerous patrons throughout the security cameras tell the Court the complete picture—Defendant Seattle Public Library retaliated because of the plaintiff race and submitted false claims and written false correspondence and illegally barred the Plaintiff from using Public Accommodations because of race and disabilities in total violation of Unfair Public Accommodations Practices Ordinance, Seattle Municipal Code Chapter 14.06, and furthermore Defendant Seattle Public Library intentionally took away Plaintiff guaranteed 1<sup>st</sup> Amendment right and intentionally oppressed plaintiff right to free speech and unlawfully retaliated based on petitioner race when in fact, “all” supporting Defendant SPL videotapes clearly show plaintiff petitioning to upper SPL Management about the discriminatory actions of Defendant Priya Wilson; where the fact is now evident that Defendant SPL used that “right to petition” Wilson discriminatory antics in a retaliatory manner because of the plaintiff black race and disabilities. And the Defendant SPL added additional punish and “exclusion methods”, by written correspondence and conveyed false and defamatory information to “others” to cause injury, and invasion of privacy despite the fact that there was absolutely no evidence of any

plaintiff wrongdoings or violation of law, and that fact of no wrongdoing by the plaintiff was evident by the fact the plaintiff checked out DVD videos and used SPL computers after each false claims by Defendants Selfe and Wilson. The Defendants false claims were based on plaintiff being of black race is therefore plaintiff is guilty because of being black. Defendant Wilson knew that plaintiff had slurred speech and cognitive due to disabilities, and the Defendant Wilson has always presented racist and offensive mocking antics toward the Plaintiff. Furthermore upon knowing the truth and "lack of any evidence" in the Defendants possession, Defendant SPL then did a complete "about face" as if the incidents did not occur and immediately welcome back the Plaintiff as if nothing had happened, leaving the Plaintiff with additional emotional distress and a \$3,002 legal bill on an issue that was entirely fabricated because of the Plaintiff black race. The emotional distress was damaging to the petitioner and the petitioner dying mother, the family was at the hands of white institutionalized racism to cause harm for no logical reason other than race, and the fabrication of outright racist defamatory lies to achieve an outcome of exclusion of Public Accommodations based on race and apartheid methods. Totally against Federal laws and State Law. Defendants Selfe, Wilson and SPL conduct was extreme and outrageous, and their discriminatory conduct carried over to cause severe emotional distress, because plaintiff mother died while plaintiff had to deal with these false accusations that were based on black race. The outrageous conducted carry over to economic deficit to the burial cost of plaintiff' mother therefore causing ADDITIONAL extreme emotional distress. February 13, 2018, Plaintiff files a claim and reports the racist issue and the \$3,002 issue with Defendant Seattle Office of Civil Rights, despite the plaintiff legal standing to sue, and it's here where protectionism and white institutionalized racism came forward to protect the Defendant City of Seattle intentional illegal network violating federal law 42 U.S.C. 1983 and 1985 and depriving plaintiff of guarantee constitutional liberties, by SOCR supporting of harassment, discrimination, lack of transparency, racism, apartheid methods, retaliation

schemes, false reporting due to race, and the implementation of false reporting and submitting and handling racial complaints in total "falsehood disregard" of federal law and state law. And SOCR did this in complete discriminatory collaboration with SPL through repetitive communication to try and steer the plaintiff in one direction to get a result that benefits Defendants SPL and City of Seattle. The SOCR went outside its mission to blatantly discriminate and tried to 'trick' and take advantage of the plaintiff's cognitive disadvantage of disabilities; "Especially, when the Plaintiff refused to move away from the "desired compensation that was requested" for the "intentional wrong" because of his race and disabilities. Defendant SOCR sent plaintiff written correspondence and met in person several times that settlement was foremost, and plaintiff agreed, and plaintiff was open to settlement and believed SOCR that a settlement would happen but the Defendant had a specific dollar amount in mind. SOCR's coercion tactic was blatant discriminatory, white protectionism, the very petition goes nowhere unless you agree to. Plaintiff balked and legally petitioned his position, and negotiations went South and plaintiff wanted a judge to hear and decide, and Defendant SOCR retaliated, and the videotape that SOCR viewed of Defendant Selfe racist and intentional wrongdoing did not matter, SOCR even used Wilson's discriminatory antics as if the City and SPL had leverage, using "their" SPL 2 months lag as penalty of expulsion for Wilson's claims when in fact there was no legal justification for any of the Defendants' racist acts and retaliation. SOCR's core mission to end institutional racism and promote racial equity and to enforce laws against illegal discrimination in public accommodations within Seattle did not matter. Protecting the city only, and SOCR made every discriminated attempt to "keep" the City protected, to the point of falsifying the facts and making racists' objectives. SOCR was illegally taking away Plaintiff's right to petition a discriminatory wrong, and that decision was based on plaintiff's race. Plaintiff outright questioned the so-called "neutrality," especially when looking at the same letterhead as the offensive parties. Defendant SOCR then exposed their discriminatory hand to protect the Defendant City of Seattle

and blatantly used discriminatory threats, to subject and orchestrate the plaintiff to additional discriminatory means based on race. A procedure and racial bias pattern that Defendants City of Seattle and the SOCR have repetitively done when covering and suppression lawsuits against the Defendant SPL toxic discriminatory environment (Security Female Guards filed discriminatory suit, and suit ended in settlement after the guards attained counsel). The SOCR actions forced the plaintiff to seek counsel at the latest hour only to face Defendant ACLU discrimination and collusion with SOCR, and attorneys, the intentionally stalling to achieve statute of limitations was a primary defense to Defendant Selfe crime, and the SOCR was taking advantage of plaintiff disabilities to confuse and mislead the plaintiff, all discriminatory tactics and threats of withdrawal if the Plaintiff seeks help. Horrible things were said by the Defendant SOCR in so many words, "It would have been better if the police would have come and shot you," and these statements were made after Defendant now "changes her story" of the August 26, 2017 incident when the videotape does not match her previous statements of physical assault and threats, and now Defendant Teresa Selfe was saying to the "entire world" she was intimidated by plaintiff black race and black skin, and now Defendant SOCR conveyed in so many words that there is "now justification" for Defendant' Teresa Selfe actions. SOCR office then makes the statement to the plaintiff in so many words, "therefore officer involved shootings are now justifiable because of black skin". And that statement came directly from Defendant SOCR, in or around the date May 30, 2018. Which according, to the laws of the United States Constitution is totally illegal for Defendant or any Defendant in this lawsuit to say, and this statement was made under the leadership of the Mayor of Seattle Jenny Durkin office, the same leadership where the Puget Sound Energy sent a board member of the NAACP the word "nigger" on a city document (August 2, 2018, documented by television news agencies throughout Seattle). Plaintiff ends all contact with Defendant SOCR, and SOCR knows plaintiff is looking for legal help and yet by their own protocol the Defendant SOCR office continues inadequate investigation in a

discriminatory manner with written falsehoods and sends a letter to the Plaintiff stating basically with or without the plaintiff signature or not this is 'the report' despite the evidentiary videotape of Defendant Teresa Selfe false claims that came from Defendant City of Seattle whereas Defendant SOCR employees have reviewed and openly admitted that Defendant Teresa Selfe had lied, however Defendant Seattle Public Library will not negotiate for financial settlement but sends the plaintiff another letter "basically apologizing" and making the statement through Public Accommodation entitlements to cater to the plaintiff needs due to disabilities. Defendant SPL discriminatory antics and toxic environment has been fabricated to cause harm to the plaintiff to take away guarantee civil rights, but whatever SPL says, is irrelevant to this point because the primary issue that brings the Plaintiff and the Defendants to the "federal forum" is the evidentiary SPL videotape" that completely exonerates the Plaintiff and shows the Federal Court the intentional "hate crime and overt discrimination" accomplished by Selfe, supported by Defendants commitment to suppress and the surveillance videotape that exposes the defendants who have "all viewed" the videotape, and the entire defendants then tried to orchestrated a discriminatory outcome with one specific goal in mind, discriminatory protection using existing white institutionalized mechanisms, coercion, discrimination means, racism, false accusations, threats and retaliation to achieve an outcome based on race and apartheid principles, and intentionally deprivation of guarantee civil liberties, the very right to petition by the 1<sup>st</sup> Amendment that is guarantee by the United States Constitution and the intentional discrimination and injury, and to exercise that right to free speech without retaliation. The Defendants have deprived the plaintiff of 4<sup>th</sup> Amendment and 14<sup>th</sup> Amendment guarantees also. Plaintiff is holding them accountable but the intentionally suppression of 1<sup>st</sup> Amendments rights by the defendants and the defendants cohesive discriminatory effort to suppress Defendant Selfe "white lie" thwarts the plaintiff attempt to reach the Courts. Including the Defendant ACLU unlawful discriminatory actions that were based on the plaintiff black race,

that gives evident rise to 42 U.S.C. 1983 and 1985 claims where Defendant ACLU intentionally subjected the Plaintiff and the “very petition” to white institutionalized racism and deprivation because the “white lady” got caught, the camera don’t lie and the SOCR has failed to reign in the plaintiff to everyone’ expectation. The Defendant ACLU intentionally used tactics to suppress plaintiff free speech to petition the ACLU regarding the evidentiary evidence that Defendant Teresa Selfe, a white woman basically used the exact same “words” in lying to cause harm to an American citizen due to his black race despite the protections of the Civil Right Act of 1866, (Defendant Selfe from her “own words” to her employer SPL, he touched my hand and caused injury, and the SPL videotape does not show “absolutely” no physical contact.) Repeat, Defendant Selfe own words! Those the complaint to show the Court Selfe “intentional lie.” and destructive discriminatory behavior. Upon further review of the truth, where the ACLU intentionally orchestrated “false help or assistance” and collaborated with defendants that went nowhere or intentionally orchestrated to the point of pacification or discouragement because of the plaintiff black race to the continuing effect of protecting Defendant SPL (Friends of the Public Library) and protecting the white institutionalized racism of Defendant City of Seattle, where the ACLU based their illegal action and failure to protect the plaintiff civil liberties not because of any budget restraints but because of plaintiff black race (ACLU filed hundreds of lawsuit against the Trump Administration to suit the ACLU personal agenda, and attained 24 million dollars in public donations on separate issues). The very right to petition Defendant Teresa Selfe discriminatory conduct was in returned a racist reflection, plaintiff was denied and deprived of 1<sup>st</sup> Amendment guarantees to lawfully petition Defendant ACLU, and was intentionally discriminated against by the ACLU themselves because of plaintiff black race. The Defendant ACLU made the Plaintiff feel like a “nigger” and basically supported Defendants Selfe and Wilson overt racism, “Plaintiff is basically a nigger that has no Constitution rights, black people have no constitution rights,” And



the weight "white institutionalized racism" of the Defendants City of Seattle, SPL and SOCR tolerates and supports the discrimination that is against federal law and the United States Constitution. The Defendants have basically self-given immunity due to privilege and race, that allows them to openly discriminate against blacks. Complete lawlessness, December 16, 2017 claim of \$3,002 that is in Defendant City of Seattle possession is being held illegally, and the City is discriminating, and withholding the claim for no valid reason other than plaintiff black race. The City has no entitlement to plaintiff money. The City claim department had six month by law, to conduct their investigation. The SPL videotape tells the story.

### **CAUSES OF ACTION**

#### **COUNT 1 CLAIM**

#### **42 U.S.C Section 1983-CONSTITUTIONAL TORT- FIRST AMENDMENT RETALIATION-DEFENDANTS SEATTLE PUBLIC LIBRARY, SEATTLE OFFICE OF CIVIL RIGHTS, CITY OF SEATTLE, ACLU, TERESA SELFE, AND PRIYA WILSON**

1. Plaintiff repeats and alleges each and every allegation set forth in the complaint, and that defendants were acting in concert with each other, also in complete violation of the Civil Rights Act of 1866.
2. Plaintiff petitioned the ACLU about the intentional discriminatory conduct of the defendants because of black race, and the ACLU turn around and did the exact discriminatory action of all defendants because of plaintiff black race, even to the point of suppress petitioner claim to the right to petition discrimination.
3. Violation of 1<sup>st</sup> Amendment rights, the right to petition Defendants conduct is protected by the First Amendment to the United States Constitution. Defendants have no legal authority to deprive plaintiff of guarantee civil rights.
4. As a result of Defendants unconstitutional conduct, petitioner suffered damages and economic damages, and plaintiff is entitled claim for the constitutional tort.

### COUNT 2 CLAIM

#### 42 U.S.C Section 1983-CONSTITUTIONAL TORT-PRIOR RESTRAINT ON FREE SPEECH-DEFENDANTS SEATTLE PUBLIC LIBRARY, SEATTLE OFFICE OF CIVIL RIGHTS, CITY OF SEATTLE, ACLU, TERESA SELFE AND PRIYA WILSON

1. Plaintiff repeats and alleges each and every allegation set forth in the complaint, and that defendants were acting in concert with each other, also in complete violation of the Civil Rights Act of 1866.
2. Plaintiff petitioned the ACLU about the intentional discriminatory conduct of the defendants because of black race, and the ACLU turn around and did the exact discriminatory action of all defendants because of plaintiff black race, even to the point of suppress petitioner claim to the right to petition discrimination.
3. Violation of 1<sup>st</sup> Amendment rights, the right to petition Defendants conduct is protected by the First Amendment to the United States Constitution. Defendants have no legal authority to take away plaintiff guarantee civil rights.
4. As a result of Defendants unconstitutional conduct, petitioner suffered damages and economic damages, and plaintiff is entitled claim for the constitutional tort.

### COUNT 3 CLAIM

#### 42 U.S.C. Section 1983-CONSTITUTIONAL TORT-VIEWPOINT-BASED RESTRICTION OF SPEECH-DEFENDANTS SEATTLE PUBLIC LIBRARY, SEATTLE OFFICE OF CIVIL RIGHTS, CITY OF SEATTLE, ACLU, TERESA SELFE AND PRIYA WILSON

1. Plaintiff repeats and alleges each and every allegation set forth in the complaint, and that defendants were acting in concert with each other, also in complete violation of the Civil Rights Act of 1866.

2. Plaintiff petitioned the ACLU about the intentional discriminatory conduct of the defendants because of black race, and the ACLU turn around and did the exact discriminatory action of all defendants because of plaintiff black race, even to the point of suppress petitioner claim to the right to petition discrimination.
3. Violation of 1<sup>st</sup> Amendment rights, the right to petition Defendants conduct is protected by the First Amendment to the United States Constitution. Defendants have no legal authority to take away plaintiff' guarantee civil rights.
4. As a result of Defendants unconstitutional conduct, petitioner suffered damages and economic damages, and plaintiff is entitled claim for the constitutional tort.

#### **COUNT 4 CLAIM**

**42 U.S.C. Section 1983-CONSTITUTIONAL TORT-CONSPIRACY TO VIOLATE  
CONSTITUTIONAL RIGHTS-DEFENDANTS SEATTLE PUBLIC LIBRARY,  
SEATTLE OFFICE OF CIVIL RIGHTS, ACLU, CITY OF SEATTLE, TERESA SELFE  
AND PRIYA WILSON**

1. Plaintiff repeats and alleges each and every allegation set forth in the complaint, and that defendants were acting in concert with each other, also in completion violation of the Civil Rights Act of 1866.
2. Plaintiff petitioned the ACLU about the intentional discriminatory conduct of the defendants because of black race, and the ACLU turn around and did the exact discriminatory action of all defendants because of plaintiff black race, even to the point of suppress petitioner claim to the right to petition discrimination.
3. 42 U.S.C. Section 1985(3) provides that if two or more persons conspire for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protections of the laws or of equal privileges and immunities under the laws, the party so injured or deprived may have an action of recovery of damages occasioned by such injury or deprivation, against any

one or more conspirators.

4. Violation of 1<sup>st</sup> Amendment rights, the right to petition Defendants conduct is protected by the First Amendment to the United States Constitution. Defendants have no legal authority to take away plaintiff guarantee civil rights.
5. As a result of Defendants unconstitutional conduct, petitioner suffered damages and economic damages, and plaintiff is entitled claim for the constitutional tort.

### COUNT 5 CLAIM

#### 42 U.S.C. Section 1983-CLAIM FOR UNCONSTITUTIONAL SEIZURE BY DEFENDANTS SEATTLE PUBLIC LIBRARY, CITY OF SEATTLE, SELFE, WILSON.

1. Plaintiff repeats and alleges each and every allegation set forth in the complaint. SPL Security Officers acting under the orders of SPL, also in complete violation of the Civil Rights Act 1866. Plaintiff petitioned the ACLU about the intentional discriminatory conduct of the defendants because of black race, and the ACLU turn around and did the exact discriminatory action of all defendants because of plaintiff black race, even to the point of suppress petitioner claim to the right to petition discrimination.
2. Which resulted in seizure without just cause violated Plaintiff rights under the 4<sup>th</sup> Amendment to the U.S. Constitution to be secure in his person against unreasonable seizure, and his right to due process under the 14<sup>th</sup> Amendment, defendant have no legal authority to take away plaintiff guarantee civil rights.
3. Illegal actions of violating federal law 42 U.S.C. 1983 and 1985 against plaintiff because of plaintiff black race was tolerated and under the authority by Defendants SPL and City of Seattle 'de facto' policies, practices and/or customs of the City of Seattle to the continuation of support racial bias to cause injury to petitioner and blacks because of race.
4. As a result of Defendants unconstitutional conduct, petitioner suffered damages and economic

damages, and plaintiff is entitled claim for the constitutional torts.

### **COUNT 6 CLAIM**

#### **42 U.S.C. Section 1983-CLAIM FOR THREATS BY DEFENDANT SEATTLE PUBLIC LIBRARY, CITY OF SEATTLE, ACLU, SEATTLE OFFICE FOR CIVIL RIGHTS, TERESA SELFE, AND PRIYA WILSON. DEFENDANTS CREATED CONSTITUTIONAL TORT.**

1. Plaintiff repeats and alleges each and every allegation set forth in the complaint. SPL Security Officers acting under the orders of SPL, also in violation of the Civil Rights Act of 1866. Plaintiff petitioned the ACLU about the intentional discriminatory conduct of the defendants because of black race, and the ACLU turn around and did the exact discriminatory action of all defendants because of plaintiff black race, even to the point of suppress petitioner claim to the right to petition discrimination, deprivation of 1<sup>st</sup> Amendment right.
2. Defendant SPL actions, which resulted in seizure without just cause violated Plaintiff rights under the 4<sup>th</sup> Amendment to the U.S. Constitution to be secure in his person against unreasonable seizure, and his right to due process under the 14<sup>th</sup> Amendment, defendants have no legal authority to take away plaintiff<sup>s</sup> guarantee civil rights, especially when plaintiff did no wrongdoing as proven by SPL surveillance tapes.
3. Illegal actions of violating federal law 42 U.S.C. 1983 and 1985 against plaintiff because of plaintiff black race was tolerated and under the authority by Defendants SPL and City of Seattle 'de facto' policies, practices and/or customs of the City of Seattle to the continuation of support racial bias to cause injury to petitioner and blacks because of race.
4. As a result of Defendants unconstitutional conduct, petitioner suffered damages and economic damages, and plaintiff is entitled claim for the constitutional torts.

## COUNT 7 CLAIM

### AMERICAN DISABILITY ACT

#### 42 U.S.C Section 1983-CONSTITUTIONAL TORT-PRIOR RESTRAINT ON FREE SPEECH and DISABILITIES-DEFENDANTS SEATTLE PUBLIC LIBRARY, SEATTLE OFFICE OF CIVIL RIGHTS, CITY OF SEATTLE, ACLU, TERESA SELFE AND PRIYA WILSON

1. Plaintiff repeats and alleges each and every allegation set forth in the complaint. SPL Security Officers acting under the orders of SPL, also in violation of the Civil Rights Act of 1866. Plaintiff has cognitive disabilities. Defendants violated the Disability Act of 1990, where Defendants intentionally interfered with day to day activities, where plaintiff struggles in day to day activities due to cognitive disabilities, and there was the intentional invasion of privacy by defendants, therefore trespassing and depriving the plaintiff of 4<sup>th</sup> Amendment Liberties of being secure in his person, defendants have absolutely no authority to take away plaintiff's civil rights guarantee by the United States Constitution.
2. Deprivation of major life activities, where plaintiff has a legal right to Public Accommodations. Plaintiff has a right to full protection in 'major life activities' in day to day activities against retaliation or threats. Rights affordable that every citizen enjoys, plaintiff is entitled to be treated equally without harassment or discrimination.
3. As a result of Defendants unconstitutional conduct, petitioner suffered damages and economic damages, and plaintiff is entitled claim due to the Defendants discrimination and intentional conduct.
4. Compensatory damages may include emotional pain and suffering by law.
5. Violation of 1<sup>st</sup> Amendment rights, the right to petition Defendants conduct is protected by the First Amendment to the United States Constitution. Defendants have no legal authority to take away plaintiff guarantee civil rights. Violation of 14<sup>th</sup> Amendment rights also.
6. As a result of Defendants unconstitutional conduct, petitioner suffered damages and economic

damages, and plaintiff is entitled claim for the constitutional torts.

### **COUNT 8 CLAIM**

#### **EMOTIONAL DISTRESS**

#### **42 U.S.C Section 1983-CONSTITUTIONAL TORT-DEFENDANTS SEATTLE PUBLIC LIBRARY, SEATTLE OFFICE OF CIVIL RIGHTS, CITY OF SEATTLE, ACLU, TERESA SELFE AND PRIYA WILSON.**

1. Plaintiff repeats and alleges each and every allegation set forth in the complaint, and that defendants were acting in concert with each other, also in completion violation of the Civil Rights Act of 1866, and deprived plaintiff of guarantee civil rights 1<sup>st</sup>, 4<sup>th</sup> and 14<sup>th</sup>.

#### **OUTRAGEOUS CONDUCT BY TERESA SELFE, PRIYA WILSON, SEATTLE PUBLIC LIBRARY, AND CITY OF SEATTLE**

2. Theses malicious defendants caused plaintiff economic harm during the most "difficult time" in plaintiff life; plaintiff mother was dying and plaintiff mother died during the duration of this discriminatory false accusations and the result of the defendants actions resulted in economic hardship to even buried the plaintiff mother due to the costs associated with these discriminatory lies and defamatory lies of the defendants, that lead to the deprivation of guarantee to civil rights were the defendants had no authority to deprive the plaintiff of guarantee rights by the United States Constitution.
3. After the fact, ACLU and SOCR continued the outrageous conduct and emotional distress.
4. As a result of Defendants unconstitutional conduct, petitioner suffered damages and economic damages, and plaintiff is entitled claim for the constitutional torts.

#### **PRAYER FOR RELIEF**

Wherefore, Plaintiff prays for the immediate judgment against the Defendants as follows:

1. An award of punitive damages and compensatory damages against all of the defendants. \$10 million dollars.
2. An award of all costs associated with the illegally actions of the defendants that brought forward this lawsuit, including the return of the \$3,002 spent on the intentional discriminatory false claim.
3. For an award of damages in an additional amount to be established at trial, in excess of \$10 million dollars, including, without limitation, actual, statutory, and/or consequential damages derived from the Defendants unlawful discriminatory conduct.
4. For additional punitive damages in amount to be proven at trial, but at least in an amount to punish and deter Defendants from such unlawful discriminatory conduct.
5. For all other relief justified under the circumstances of this case.
6. For award of attorney's fees and cost under, 42 U.S.C. Section 1988.
7. For monetary damages for emotional infliction of distress. \$10 million dollars.
8. The petitioner to have the right to add other defendants to this lawsuit.

#### DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under the penalty of perjury that Andre Hoskins is the plaintiff, and that Andre Hoskins has read the above complaint, and that the information contained therein is true and correct. 28 U.S.C. Section 1746, 18 U.S.C. Section 1621.

Andre Hoskins  
4740 32nd Ave S. 6-203  
Seattle, WA 98118  
Telephone Privacy

Date August 24<sup>th</sup> 2018  
Andre Hoskins  
Signature of Complaint  
ANDRE HOSKINS  
8/24/2018



FILED \_\_\_\_\_ ENTERED \_\_\_\_\_  
LODGED \_\_\_\_\_ RECEIVED \_\_\_\_\_

UNITED STATES DISTRICT COURT OF WESTERN WASHINGTON AUG 24 2018 DJ

Andre Hoskins  
Plaintiff

18 CV 1252 - RAJ  
CASE NUMBER  
AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY

CERTIFICATE OF FILING

42 U.S.C. Section 1983  
42 U.S.C. Section 1985  
Civil Rights Act of 1866

Against

American Disability Act of 1990  
**Demand for a Jury Trial**

American Civil Liberties Union Foundation,  
Seattle Office for Civil Rights, City of Seattle,  
and Seattle Public Library, Teresa Selfe, also  
in the capacity of her individual person, and Priya Wilson,  
also in the capacity of her individual person.

Defendants

*Andre Hoskins*  
8/24/2018

CERTIFICATE OF FILING

18 CV 1252-RAJ

CERTIFICATE OF FILING

I, ANDREW HOSKINS FILED A COMPLAINT  
IN THE WESTERN DISTRICT COURT OF  
WASHINGTON ON August 24, 2018.

Andrew Hoskins

August 24, 2018

ANDREW HOSKINS  
4740 32nd Ave S. 6-203  
SEATTLE, WA 98148

FILED ENTERED  
LODGED RECEIVED

AUG 24 2018 DJ

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

CERTIFICATE OF FILING