



Removal, based on both civil and criminal removal of both civil and criminal contempt, Judge William H. Burris held a trial of Belinda Parker Brown and entered either a civil or criminal, or quasi-criminal judgment against her, complete with an assessed penalty and subpoena for execution of judgment within 30 days (See Exhibit C).

4. We, the removing Defendants, charge that Judge William H. Burris' actions, knowing and intentionally violated 28 U.S.C. §1455(b)(3), and thus constitute a contempt of that removal statute.

5. Under 28 U.S.C. §1455(b)(3), the ONLY way that a State Court can violate the criminal removal statute is by entering judgment prior to remand, and that is exactly what William H. Burris did on Thursday afternoon after a hearing that lasted longer than two-hours.

**Whether based on Civil or Criminal prosecutions, or both,  
OUR REMOVAL ON SEPTEMBER 7 was TIMELY**

6. The setting of this hearing by subpoena served on Belinda Parker Brown on August 9, 2023, was the triggering event, within the meaning and purpose of all state-to-federal removal statutes, in that this was the date on which India Armani Ratliff and Belinda Parker Brown both knew that they would be systemically denied the equal protection of the laws, and that



Belinda Parker Brown would be prevented from taking actions to secure the equal protection of the law, in relation to her work with officers of the U.S. Department of Justice.

7. Judge Burris' actions against Federal sub-agent or quasi-agent Belinda Parker Brown also deprived India Armani Ratliff of equal protection of the laws according to one or two systematic statutory programs enacted into law in Louisiana, namely either contempt or unauthorized practice of law or both, thus specifically warranting removal to this District Court on September 7, 2023, within the meaning of each of 28 U.S.C. §§1442, 1443(1), 1443(2), 1446 and 1455. (See Exhibit B).

8. As we outlined in our Notice of Removal filed yesterday, the bases for prosecution of the two removing defendants constitute a mixed bag of civil, quasi-criminal, and criminal charges against Ratliff and Brown.

9. The form and purpose of the Order to Show Cause against Belinda Parker Brown contained and covered elements of civil and criminal contempt, as well as apparent charges of violations of both civil and criminal statutes imposing both positive and negative obligations.

10. Ironically, our own present Motion for Order to Show Cause and to Set Evidentiary Hearing on Contempt of Removal presents many of the same problems of interpretation as Judge Burris' Order to Show Cause against Belinda Parker Brown, except that we do not threaten any of Judge Burris' fundamental First, Fifth, or Ninth amendment rights by asking this Court to find that he committed a contempt of 28 U.S.C. §1455(b)(3).

11. The State's charges, channeled through Chief Judge William H. Burris, against India Armani Ratliff are indisputably "criminal" in nature.

12. However, the injury done to Ratliff by Chief Judge Burris' interference with and infringement on Belinda Parker Brown's First Amendment Civil Rights, which causes the curtailment of India Armani Ratliff's rights to due process of law and equal protection, is either civil or "quasi-criminal" in nature.

13. And the charges against Belinda Parker Brown, sounding purely in contempt and labelled "indirect contempt" and nominally prosecuted under the Louisiana Code of Criminal Procedure (Article 23, see Exhibit B) are



likewise either civil or quasi-criminal in nature<sup>1</sup>. See also the badges and incidents of judgment, namely jail slip and subpoena, issued September 7.

14. We bring this Notice of Removal as only our first step; we intend immediately to file and seek a Rule 65 Temporary Restraining Order and

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<sup>1</sup> Louisiana law dividing and classifying the nature and punishment of “unauthorized practice of law” as a matter of civil and/or criminal procedure, especially but not limited to contempt, is hopelessly (unconstitutionally) confusing, vague, overbroad and overinclusive, and clearly infringes on freedom of expression, of association, the right to petition, and other “First Amendment” rights. The law makes a complete circle, or several circles, actually, in and around La. R.S. 37:213.

The Louisiana Statutes provide that there is a cognizable civil claim for all aggrieved parties when there has been an instance of unauthorized practice of law. La. R.S. 37:213.1 provides as follows:

A. In addition to any criminal proceedings and criminal penalties set forth in R.S. 37:213, the provisions of this Section shall apply to civil proceedings against persons engaged in, or who have engaged in, the unauthorized practice of law.

B. As used in this Section, the following terms shall be defined as follows:

(1) “Actor” means a natural or juridical person who is engaged in or has engaged in the unauthorized practice of law. The term “actor” shall not include a Louisiana attorney licensed to practice law or a Louisiana attorney who is suspended or disbarred from the practice of law. The term “actor” may include a Louisiana attorney who has been permanently disbarred or who has permanently resigned from the practice of law. .

(2) “Aggrieved party” means a natural or juridical person who has sustained any damage or harm as a result of an actor engaged in the unauthorized practice of law. The term “aggrieved party” shall not include an attorney or a law firm.

(3) “Unauthorized practice of law” means any of the prohibited activities set forth in R.S. 37:213, which with brilliantly meaningless circularity, and without deeper definition, in turn prohibits anyone not licensed to practice law to:

(1) Practice law.

(2) Furnish attorneys or counsel or an attorney and counsel to render legal services.

(3) Hold himself or itself out to the public as being entitled to practice law.

(4) Render or furnish legal services or advice.....

Removing Defendant Ratliff and Respondent Brown assert that these definitions are unconstitutional and absolutely NULL & VOID FOR VAGUENESS.

Preliminary Injunction, to be separately briefed, on all Louisiana State Court proceedings against us in the 22<sup>nd</sup> Judicial District, on the grounds that we have been denied our rights under 42 U.S.C. §1981.

15. We contend that the state actions against us included but were not limited to the Order to Show Cause for Contempt of Court (dated July 18, 2023, but not served on Belinda Parker Brown until August 8 or 9, so that we still reiterate and here preserve our right to present this court with a formal Civil Rights Complaint and Application for Preliminary Injunction against enforcement or execution of the judgement for the prosecution pronounced against Ms. Parker Brown in Exhibit B, pursuant to 42 U.S.C. §§1983, 1988(a), as allowed by a proposed finding of extraordinary circumstances.

16. It is unnecessary to repeat all of the allegations of our Notice of Removal in this Motion for Order to Show Cause.

17. Suffice it to say that in his haste, attempting by his reckless, wanton and willful disregard for our rights, to render our removal to this Court moot by proceeding immediately not merely to trial but to entry of final judgment, Judge William H. Burris in fact has justified or action of removal



and vindicated our analysis of his oppressive and unconstitutional motivation and strategy quite completely and entirely.

**CONCLUSIONS & SUMMARY ARGUMENTS**

18. Acting on our own behalf, in propria persona, as a defendant and respondent, pro se, respectively, we move and request that this Court enter an **ORDER TO SHOW CAUSE why Judge Burris should not be found in Contempt of the Removal Statute**, and subject to entry of a declaratory judgment that he himself acted in the COMPLETE ABSENCE OF JURISDICTION, to the extent that he entered or will enter judgment against Belinda Parker Brown prior to review of this removal by evidentiary hearing resulting in remand.

19. We ask that this Court Order our Motion for Order to Show Cause to be formally served by the U.S. Marshals Service on Judge William H. Burris, as such service befits the dignity of his State judicial office and the presumption of immunity which must inure, prior to entry of a declaratory judgment, against all judges under 42 U.S.C. §§1983 and 1988.

20. As noted, we do not waive and in fact reserve the right to file a separate complaint for prospective declaratory and injunctive relief against the prosecution which we timely removed to this Court.

21. Furthermore, we reserve the right to present a Memorandum of Points & Authorities in support of this Motion for Order to Show Cause for for a full evidentiary hearing on both our removal and Judge Burris' contempt of removal by entry of judgment on September 7, 2023.

22. We move such hearing be specially set for 6 hours of the court's time.

**PRAYER FOR RELIEF**

**23. WHEREFORE AND ACCORDINGLY,** we the undersigned original Defendant and Respondent to Order to Show Cause ask this Court to issue the attached Order to Show Cause to Judge William H. Burris why he should not be declared to have committed a criminal contempt of one or more of the removal statutes 28 U.S.C. §§1442, 1443(1), 1443(2), 1446, and/or 1455, including especially but not limited to 28 U.S.C. §1455(b)(3).

**24.** We request special service by the U.S. Marshals Service, as stated.

**Request for Evidentiary Hearing pursuant to 28 U.S.C. §1455**



25. We move and pray for a full evidentiary hearing as required by 28 U.S.C. §1455, to be scheduled and held within 21 days of this Motion, specially set for at least six hours. (Proposed Order attached as Exhibit D).

26. We ask that Judge William H. Burris be found in contempt of removal, that he be declared to have acted in the complete absence of jurisdiction by entering judgment prior to the remand of this case, and for all such other and further relief as a matter of constitutional and statutory law or equity, fairness, and justice, as this Court may deem right and appropriate in order to sustain the dignity and equal protection of the laws.

Respectfully submitted,

Friday  
8 September 2023

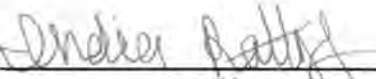
By: \_\_\_\_\_



**Belinda Parker-Brown**  
**1622 -11<sup>th</sup> Street**  
**Slidell, Louisiana 70458**  
**Telephone: (985) 503-0626**  
**Email: [belindabrownlld@yahoo.com](mailto:belindabrownlld@yahoo.com)**

**And**

By: \_\_\_\_\_



**India Armani Ratliff**  
**38197 North 3<sup>rd</sup> Avenue**  
**Slidell, Louisiana 70460**

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served, by email and first-class mail (priority certified with return receipt requested), a copy of our above-and-foregoing MOTION FOR ORDER TO SHOW CAUSE And FOR EVIDENTIARY HEARING pursuant to 28 U.S.C. §§1442, 1443, 1446 and 1455 upon the following attorneys of record:

**Gavin Richard Esq.  
John Lindner, Esq.  
22<sup>nd</sup> JDC Public Defender's Office  
402 North Jefferson Street  
Covington, Louisiana 70433**

**Cameron Mary, Esq.  
4021 De Soto Street  
Mandeville, Louisiana 70448**

**DFC August Majorie  
St. Tammany Parish Sheriff Office  
P.O. Box 1120  
Covington, Louisiana 70434**

**Darrell Sims, Esq.  
Roy Burns, Esq.  
22<sup>nd</sup> JDC District Attorney's Office  
701 Columbia Street  
Covington, LA 70433**



Done and executed (and sent by electronic mail) on this Friday, the  
8<sup>th</sup> day of September, 2023.



---

**Belinda Parker-Brown**  
**1622 -11<sup>th</sup> Street**  
**Slidell, Louisiana 70458**  
**Telephone: (985) 503-0626**

**Email: [belindabrownlld@yahoo.com](mailto:belindabrownlld@yahoo.com)**

**Exhibit A:**  
**22<sup>nd</sup> Judicial District Court Docket**  
**Attached in Compliance with**  
**28 U.S.C. §1447(b)**



Enterprise Case Manager

Case Summary

Case No. 3163-M-2022

STATE OF LOUISIANA vs. RATLIFF, INDIA ARMANI §  
 §

Location: Enterprise Case Manager  
 Filed on: 06/20/2022

Case Information

Offense	Statute	Degree	Offense Date	Filed Date	Case Type: Adult Misdemeanor
Jurisdiction: <b>St. Tammany Parish Sheriff's Office</b>					
1. SIMPLE CRIMINAL DAMAGE TO PROPERTY LESS THAN \$1,000	14:56(A) (B)(1)	M	12/03/2021	06/20/2022	Case Status: <b>06/20/2022 Filed</b>
Arrest Date: 05/23/2022 ATN: 520012200445					

**Bonds**

<b>Cash Bond</b>	#460448	\$750.00
06/23/2022	Received at Clerk's Office	
05/24/2022	Posted	
Counts: 1		

Assignment Information

**Current Case Assignment**

Case Number 3163-M-2022  
 Court Enterprise Case Manager  
 Date Assigned 07/13/2022

Party Information

<b>State</b>	STATE OF LOUISIANA Other	
<b>Defendant</b>	RATLIFF, INDIA ARMANI Black Female Height: 4' 10" Weight: 115 DOB: 12/14/2001	RICHARD, GAVIN M <i>Public Defender</i> 402 N JEFFERSON COVINGTON, LA 70433
<b>Bond Payor</b>	TOBIAS, PITRA Black Female Height: 5' 5" DOB: 09/24/1976	
<b>Other</b>	Coco, Kristyn	


Case Events


09/07/2023  Subpoena  
 Belinda Parker Brown execution of sentence


## Case Summary


Case No. 3163-M-2022


Created: 09/07/2023 4:05 PM


09/07/2023  E-Mail Confirmation Sheet  
*COLLECTIONS*  
Created: 09/07/2023 3:33 PM


09/07/2023  Jail Slip  
*Belinda Parker Brown found guilty of contempt*  
Created: 09/07/2023 3:11 PM


09/06/2023  Transcript Taken On  
*MAY 11, 2023*  
Created: 09/06/2023 9:10 AM


09/06/2023  Transcript Taken On  
*MAY 11, 2023 IN RE: BELINDA PARKER BROWN*  
Created: 09/06/2023 9:11 AM


08/28/2023  Defense Witness Summ. Return  
*KRISTYN COCO*  
Created: 08/30/2023 1:22 PM


08/21/2023  Subpoena  
Created: 08/21/2023 12:40 PM


08/18/2023  Subpoena Request  
Created: 08/21/2023 12:40 PM


08/09/2023  Sheriff's Return  
*BELINDA PARKER BROWN*  
Created: 08/09/2023 10:47 AM


08/08/2023  Sheriff's Return  
*DY TYLER MATTE*  
Created: 08/11/2023 11:24 AM


08/04/2023  Witness Subpoena  
*Dy. T. Matte*  
Created: 08/04/2023 9:10 AM

08/04/2023  Witness Subpoena  
*Request - Dy. Tyler Matte*  
Created: 08/04/2023 9:09 AM

08/01/2023  Sheriff's Return  
*DEFENDANT*  
Created: 08/03/2023 9:22 AM

07/25/2023  Sheriff's Return  
*CAMERON MARY, ESQ*  
Created: 07/26/2023 9:07 AM

07/24/2023  Sheriff's Return  
*DFC AUGUST MAJORIE*  
Created: 07/26/2023 8:51 AM

07/24/2023  Sheriff's Return



## Case Summary

Case No. 3163-M-2022

GAVIN RICHARD, ESQ.

Created: 07/26/2023 8:47 AM

- 07/18/2023  Notice  
*Put in DA basket for Darrell Sims, Esq. and Roy Burns, III, Esq. and PDO basket for John Linder, Esq.*  
Created: 07/18/2023 12:07 PM
- 07/18/2023  Subpoena  
*India Ratliff*  
Created: 07/18/2023 12:01 PM
- 07/18/2023  Subpoena  
*DFC August Majorie*  
Created: 07/18/2023 11:57 AM
- 07/18/2023  Subpoena  
*Cameron Mary, Esq.*  
Created: 07/18/2023 11:54 AM
- 07/18/2023  Subpoena  
*Gavin Richard, Esq.*  
Created: 07/18/2023 11:51 AM
- 07/18/2023  Subpoena  
*Belinda Parker Brown*  
Created: 07/18/2023 11:48 AM
- 07/18/2023  Order  
*BY CHIEF JUDGE WILLIAM BURRIS*  
Created: 07/18/2023 11:10 AM
- 07/13/2023  Defendant's Personal Service  
Created: 07/13/2023 10:28 AM
- 07/13/2023  Notice of Misdemeanor Trial  
Created: 07/13/2023 10:28 AM
- 05/11/2023  Defendant's Personal Service  
Created: 05/11/2023 11:07 AM
- 05/11/2023  Notice of Misdemeanor Trial  
Created: 05/11/2023 11:07 AM
- 12/13/2022  Defendant's Personal Service  
Created: 12/13/2022 10:27 AM
- 12/13/2022  Motion and Order to Continue  
Created: 12/14/2022 9:43 AM
- 10/17/2022  Motion and Order to Continue  
Created: 10/17/2022 2:14 PM
- 10/17/2022  Defendant's Personal Service  
Created: 10/17/2022 2:02 PM
- 09/02/2022  Document Signed by Judge (Judicial Officer: Badeaux, Reginald T., III)

## Case Summary

Case No. 3163-M-2022

Created: 09/02/2022 2:41 PM

09/02/2022 Document Sent to Judge for Signature (Judicial Officer: Badeaux, Reginald T., III)  
Created: 09/02/2022 8:33 AM

09/01/2022  Motion and Order for Discovery (bill/part., inspec. prod)  
Filing Party: Attorney RICHARD, GAVIN M  
Created: 09/01/2022 4:45 PM

08/30/2022  Document Signed by Judge (Judicial Officer: Badeaux, Reginald T., III)  
Created: 09/01/2022 1:40 PM

08/30/2022 Document Sent to Judge for Signature (Judicial Officer: Badeaux, Reginald T., III)  
Created: 08/30/2022 9:38 AM

08/25/2022 Motion and Order to Determine Eligibility  
Created: 08/25/2022 2:47 PM

08/22/2022  Defendant's Personal Service  
Created: 08/22/2022 10:38 AM

07/13/2022  Defendant's Personal Service  
Created: 07/15/2022 3:18 PM

06/23/2022  Bond Received at Clerk's Office  
Created: 07/01/2022 1:49 PM

06/23/2022 CMIS - Defendant Out on Bond  
Created: 07/01/2022 1:51 PM

06/20/2022  Bill of Information  
Filing Party: State STATE OF LOUISIANA  
Created: 06/29/2022 10:33 AM


## Dispositions

07/13/2022 **Plea** (Judicial Officer: Hand, August J.)  
RATLIFF, INDIA ARMANI  
1. SIMPLE CRIMINAL DAMAGE TO PROPERTY LESS THAN \$1,000  
Not Guilty  
ATN: 520012200445 CSN:  
Created: 07/25/2022 10:29 AM

## Hearings

10/19/2023 **Judge Trial** (8:30 AM)  
Resource: Location Misdemeanor Courtroom  
Created: 07/31/2023 3:56 PM

09/07/2023 **Hearing** (1:30 PM) (Judicial Officer: Burriss, William H.)  
Resource: Court Reporter Wells, Kathleen  
Resource: Court Staff Mouton, Angel  
Resource: Court Staff Dover, Iain A  
Resource: Court Staff Slawson, Seth  
Resource: Location Division E  
Created: 07/18/2023 11:47 AM

07/13/2023  **Judge Trial** (8:30 AM) (Judicial Officer: Badeaux, Reginald T., III)

**Case Summary****Case No. 3163-M-2022**

Resource: Court Reporter Heath, Donna L.  
 Resource: Court Staff Wood, Amie  
 Resource: Court Staff Cooper, Willie  
 Resource: Court Staff Burns, Roy K.  
 Resource: Court Staff Sims, Darrell R.  
 Resource: Court Staff Ziifle, Matthew A  
 Resource: Location Misdemeanor Courtroom

**MINUTES - 07/13/2023****Judge Trial** (10/19/2023 at 8:30 AM)

Resource: Location Misdemeanor Courtroom

Created: 07/31/2023 3:56 PM

Continued: JOINT

*Parties Present: Attorney RICHARD, GAVIN M  
 Defendant RATLIFF, INDIA ARMANI*

*Continued*

Created: 05/11/2023 11:11 AM

05/11/2023

**Judge Trial** (8:30 AM) (Judicial Officer: Burris, William H.)

Resource: Court Reporter Heath, Donna L.  
 Resource: Court Staff Wood, Amie  
 Resource: Court Staff Sims, Darrell R.  
 Resource: Court Staff Amos, Patricia  
 Resource: Court Staff Matte, Tyler  
 Resource: Location Misdemeanor Courtroom

**MINUTES - 05/11/2023****Judge Trial** (07/13/2023 at 8:30 AM) (Judicial Officer: Badeaux, Reginald T., III)

Resource: Court Reporter Heath, Donna L.  
 Resource: Court Staff Wood, Amie  
 Resource: Court Staff Cooper, Willie  
 Resource: Court Staff Burns, Roy K.  
 Resource: Court Staff Sims, Darrell R.  
 Resource: Court Staff Ziifle, Matthew A  
 Resource: Location Misdemeanor Courtroom

*Continued*

Created: 05/11/2023 11:11 AM

Continued; DEFENSE

*Parties Present: State STATE OF LOUISIANA  
 Attorney RICHARD, GAVIN M  
 Defendant RATLIFF, INDIA ARMANI*

*Continued*

Created: 12/14/2022 9:42 AM

12/13/2022

**Judge Trial** (8:30 AM) (Judicial Officer: Creel, Ellen M.)

Resource: Court Reporter Heath, Donna L.  
 Resource: Court Staff Rogers, Jonathon  
 Resource: Court Staff Burns, Roy K.  
 Resource: Court Staff Sims, Darrell R.  
 Resource: Court Staff Burris, Ashton  
 Resource: Court Staff Amos, Patricia  
 Resource: Court Staff Nicholson, Taylor G  
 Resource: Location Misdemeanor Courtroom

**MINUTES - 12/13/2022****Judge Trial** (05/11/2023 at 8:30 AM) (Judicial Officer: Burris, William H.)

Resource: Court Reporter Heath, Donna L.  
 Resource: Court Staff Wood, Amie  
 Resource: Court Staff Sims, Darrell R.  
 Resource: Court Staff Amos, Patricia  
 Resource: Court Staff Matte, Tyler  
 Resource: Location Misdemeanor Courtroom

*Continued*

Created: 12/14/2022 9:42 AM



**Case Summary****Case No. 3163-M-2022**

Motion and Order to Continue

Created: 12/14/2022 9:43 AM

Continued; DEFENSE WRITTEN


Parties Present: State STATE OF LOUISIANA

Attorney RICHARD, GAVIN M

Defendant RATLIFF, INDIA ARMANI

*Continued*

Created: 10/28/2022 3:11 PM

10/17/2022 **Judge Trial** (8:30 AM) (Judicial Officer: Keller, John A.)

Resource: Court Reporter Heath, Donna L

Resource: Court Staff Wood, Amie

Resource: Court Staff Burns, Roy K.

Resource: Court Staff Sims, Darrell R.

Resource: Court Staff Germany, Whitney

Resource: Court Staff Amos, Patricia

Resource: Court Staff Nicholson, Taylor G

Resource: Court Staff Hunt, Kailynd

Resource: Location Misdemeanor Courtroom

**MINUTES - 10/17/2022**

Motion and Order to Continue

Created: 10/17/2022 2:14 PM

**Judge Trial** (12/13/2022 at 8:30 AM) (Judicial Officer: Creel, Ellen M.)

Resource: Court Reporter Heath, Donna L

Resource: Court Staff Rogers, Jonathon

Resource: Court Staff Burns, Roy K.

Resource: Court Staff Sims, Darrell R.

Resource: Court Staff Burris, Ashton

Resource: Court Staff Amos, Patricia

Resource: Court Staff Nicholson, Taylor G

Resource: Location Misdemeanor Courtroom


*Continued*

Created: 10/28/2022 3:11 PM

Continued; DEFENSE WRITTEN

*Continued*

Created: 08/22/2022 3:17 PM

08/22/2022 **Judge Trial** (8:30 AM) (Judicial Officer: Hand, August J.)

Resource: Court Reporter Heath, Donna L

Resource: Court Staff Wood, Amie

Resource: Court Staff Burns, Roy K.

Resource: Court Staff Sims, Darrell R.

Resource: Court Staff Germany, Whitney

Resource: Court Staff Amos, Patricia

Resource: Court Staff Nicholson, Taylor G

Resource: Court Staff Ezell, Jonathan

Resource: Location Misdemeanor Courtroom

**MINUTES - 08/22/2022****Judge Trial** (10/17/2022 at 8:30 AM) (Judicial Officer: Keller, John A.)

Resource: Court Reporter Heath, Donna L

Resource: Court Staff Wood, Amie

Resource: Court Staff Burns, Roy K.

Resource: Court Staff Sims, Darrell R.

Resource: Court Staff Germany, Whitney

Resource: Court Staff Amos, Patricia

Resource: Court Staff Nicholson, Taylor G

Resource: Court Staff Hunt, Kailynd

Resource: Location Misdemeanor Courtroom

*Continued*

**Case Summary****Case No. 3163-M-2022**

Created: 08/22/2022 3:17 PM


Continued: DEFENSE

Parties Present: State STATE OF LOUISIANA

Defendant RATLIFF, INDIA ARMANI

*Continued*

Created: 07/25/2022 10:28 AM

07/13/2022 **Arraignment** (8:30 AM) (Judicial Officer: Hand, August J.)

Resource: Court Reporter Heath, Donna L.

Resource: Court Staff Milazzo, Brittany

Resource: Court Staff Brewster, Jessica J.

Resource: Court Staff Burns, Roy K.

Resource: Court Staff Germany, Whitney

Resource: Court Staff Amos, Patricia

Resource: Court Staff Nicholson, Taylor G

Resource: Court Staff Cooper, Tara D

Resource: Location Misdemeanor Courtroom

**MINUTES - 07/13/2022****Judge Trial** (08/22/2022 at 8:30 AM) (Judicial Officer: Hand, August J.)

Resource: Court Reporter Heath, Donna L.

Resource: Court Staff Wood, Amie

Resource: Court Staff Burns, Roy K.

Resource: Court Staff Sims, Darrell R.

Resource: Court Staff Germany, Whitney

Resource: Court Staff Amos, Patricia

Resource: Court Staff Nicholson, Taylor G

Resource: Court Staff Ezell, Jonathan

Resource: Location Misdemeanor Courtroom

*Continued*

Created: 07/25/2022 10:28 AM

**Plea** (Judicial Officer: Hand, August J.)

RATLIFF, INDIA ARMANI

1. SIMPLE CRIMINAL DAMAGE TO PROPERTY LESS THAN \$1,000

Not Guilty

ATN: 520012200445 CSN:

Created: 07/25/2022 10:29 AM

Held; PLEAD N/GUILTY

Parties Present: State STATE OF LOUISIANA

Defendant RATLIFF, INDIA ARMANI

*Held*

Created: 06/29/2022 9:37 AM

**Exhibit B:**  
Summons for Hearing  
September 7, 2023  
To Belinda Parker Brown  
1622-11<sup>th</sup> Street  
Slidell, Louisiana 70458



SERVE

Docket 3163-M-2022 Division E

**State of Louisiana - Parish of St. Tammany**

Covington, LA, July 18, 2023

**TO: BELINDA PARKER BROWN**  
1622 - 11<sup>th</sup> STREET  
SLIDELL, LA 70458

See that principal receives this summons.

YOU ARE HEREBY SUMMONED to appear at the Justice Center, in the City of Covington, on **September 07, 2023** at the hour of **1:30 p.m.** for **Hearing** in the Twenty-Second Judicial District Court, and there continue from day to day until discharged by the Court.

**FAILURE TO APPEAR IN COURT WILL  
RESULT IN BOND FORFEITURE AND AN  
ATTACHMENT ISSUED FOR YOUR ARREST**

Melissa R. Henry, Clerk of Court

*Amy Novotny*  
Amy Novotny,  
Deputy Clerk

RECEIVED  
CLERK CIVIL  
JUL 18 10 05  
501 CH 81 70458

STATE OF LOUISIANA

22<sup>ND</sup> JUDICIAL DISTRICT COURT

V.

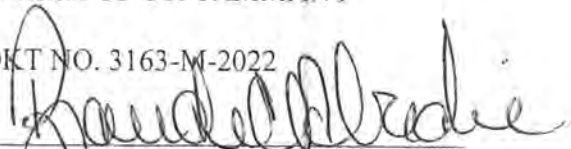
STATE OF LOUISIANA

PARISH OF ST. TAMMANY

INDIA ARMANI RATLIFF

DKT NO. 3163-M-2022

**JUL 18 2023**

  
DEPUTY CLERK

FILED

**ORDER FOR HEARING FOR CITATION FOR CONSTRUCTIVE CONTEMPT**

The Court upon its own motion hereby orders a show cause hearing to determine whether Belinda Parker Brown has acted in indirect contempt of the Court pursuant to La. C. Cr. P. art. 23 which provides in relevant part:

A constructive contempt of court is any contempt other than a direct one. A constructive contempt includes, but is not limited to any of the following acts:

...

(4) Unlawful detention of a witness, the defendant or his attorney, or the district attorney, while going to, remaining at, or returning from the court;

...

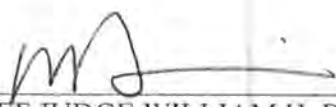
(6) Assuming to act as a juror, or as an attorney or other officer of the court, without lawful authority;

....

Specifically, Belinda Parker Brown, on May 11, 2023, interceded in the above criminal matter and interfered with the ability of Gavin Richard, the defense attorney, to represent his client and to communicate effectively with said client, physically prevented communication between attorney and his client, causing disruption during a recess in misdemeanor proceedings while in the courtroom and attempting to cause disrepute to the defendant's attorney and did further unlawfully offer legal advice without a license to practice law.

IT IS ORDERED THAT Belinda Parker Brown show cause before me on the 7<sup>th</sup> day of September, 2023, at 1:30 p.m. in Courtroom 9 why she should not be held in contempt pursuant to Louisiana Code of Criminal Procedure, Articles 23 and 24, and face the penalties provided for in La. C. Cr. P. art. 25, and as justice so requires.

Covington, Louisiana, this 14<sup>th</sup> day of July, 2023.

  
CHIEF JUDGE WILLIAM H. BURRIS  
22<sup>ND</sup> JUDICIAL DISTRICT COURT  
DIVISION E

**Please serve:**

Belinda Parker Brown ✓  
1622 – 11<sup>th</sup> Street  
Slidell, LA 70458

Gavin Richard, Esq.  
22<sup>nd</sup> JDC Public Defender's Office  
402 N. Jefferson Street  
Covington, LA 70433

Cameron Mary, Esq.  
4021 DeSoto St.  
Mandeville, LA 70448

DFC August Majorie  
St. Tammany Parish Sheriff Office  
P.O. Box 1120  
Covington, LA 70434

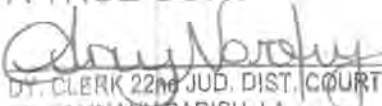
India Ratliff  
38197 N, 3<sup>rd</sup> Ave.  
Slidell, LA 70460

**Please send notice to:**

Darrell Sims, Esq.  
Roy Burns, III, Esq.  
22<sup>nd</sup> JDC District Attorney's Office  
701 N. Columbia St.  
Covington, LA 70433

John Lindner, Esq.  
22<sup>nd</sup> JDC Public Defender's Office

A TRUE COPY

  
DFC CLERK 22<sup>ND</sup> JUD. DIST. COURT  
ST. TAMMANY PARISH, LA



**Exhibit C:**  
Jail Slip and Subpoena  
Issued on September 7, 2023

# 22ND JUDICIAL DISTRICT COURT

Judge: Benn

Defendant Belinda Parker Brown

Docket # for case indistkatiff

Date to Appear 10/9/23

Courtroom \_\_\_\_\_ Division E

FOR: DKT. 3163m 2023

- Arraignment @ 8:30 AM
- Misdemeanor Trial @ 8:30 AM
- Sentencing @ 8:30 AM
- EOS @ 8:30 AM
- Motion @ 8:30 AM
- Probation Revocation @ 8:30 AM
- Status Conference @ 8:30 AM
- Other execution of seat
- Sanity Hearing/Review @ 8:30 AM
- Pre-Trial \_\_\_\_\_
- Jury Trial \_\_\_\_\_

- Defendant handed Written Notice
- Attorney Accepted Notice on Behalf of Defendant

By order of this court 7 day of Sept, 20 23  
at Covington, Louisiana.

**Randy Smith, Sheriff**

By Amendes, Deputy Clerk

Signed by P/S, Defendant

Melissa R. Henry  
Clerk of Court

CRIMINAL/CIVIL  
CLERK OF COURT / CRIMINAL DIVISION

Original - White • Defendant - Canary • Attorney Copy - Pink

Take This To The Sheriff's Office

Name:	<b>BELINDA PARKER BROWN IN THE CASE OF INDIA ARMANI RATLIFF</b>	Race/Sex:	<b>Black</b>	<b>Female</b>	DK#	<b>3163-M-2022</b>	<input type="checkbox"/>	72's
Charges:	<b>CONTEMPT FEES</b>	Fine:	1000.00	Cost:	X	Or		Days
Sentence:	<input type="checkbox"/> Parish Jail:	<input type="checkbox"/> DOC:						
	<input type="checkbox"/> Report To Jail:	<input type="checkbox"/> Exec. Of Sent.	<input type="checkbox"/> CTS.	<input type="checkbox"/> Revocation Hearing				
	<input type="checkbox"/> Consecutive	<input type="checkbox"/> Concurrent	<input type="checkbox"/> 894	<input type="checkbox"/> Deferred Sentence	<input type="checkbox"/> Suspended Sentence			
	<input type="checkbox"/> Supervised Probation for:				<input type="checkbox"/> Unsupervised Probation For:			
Special Conditions:	<input checked="" type="checkbox"/> 1. Pay Fine and Cost	<input type="checkbox"/> 2. 8 Hrs. Day C/S	<input type="checkbox"/> 3. Substance Abuse Program					
	<input type="checkbox"/> 4. Driver Improvement Program	<input type="checkbox"/> 5. Drug Screening	<input type="checkbox"/> 6. Refrain From Criminal Conduct					
	<input type="checkbox"/> 7. Pay IDF	<input type="checkbox"/> 8. Supervision Fee	<input type="checkbox"/> 9. Attend Mental Health Clinic					
	<input type="checkbox"/> 10. Make Restitution to:	In the Amount Of		By				
	<input type="checkbox"/> 11. JEF	<input type="checkbox"/> 12. Drug Court	<input type="checkbox"/> MADD					
Remarks:	<b>BELINDA PARKER BROWN HEARING FOR IN-DIRECT CONTEMPT FOUND GUILTY AND SENTENCED TO PAY \$1000.00 AND COSTS EXECUTION OF SENTENCE DATE IS 10/9/23</b>							
Court Date:	9/7/2023			Judge:	WILLIAM H. BURRIS			
Deputy/Clerk:	Angel Mouton			Received By/Radio Number				

Thursday, May 2, 2019



# **Exhibit D:**

## **Proposed Order to Show Cause, Setting Evidentiary Hearing**



- (1) The U.S. Marshals Service is directed to effect personal service of this Order on Chief Judge William H. Burris of the 22<sup>nd</sup> Judicial District Court, sitting in the City of Covington, Parish of St. Tammany, Louisiana.
- (2) Chief Judge William H. Burris is ordered to file a written response to this Order to Show Cause on or before the \_\_\_\_ day of \_\_\_\_\_, 2023, showing why he should not be held in Contempt of one or more Removal Statutes 28 U.S.C. §1442, 1443(1), 1443(2), §1446 and 1455, especially but not limited to §1455(b)(3).
- (3) The Court notes that Civil Removal is effective as a stay of all State Court actions automatically, while Criminal Removal is effective only to prevent entry of judgment prior to remand, but that it very plainly appears that Chief Judge William H. Burris entered judgment against Belinda Parker Brown within six-to-eight hours of the filing and service of her Notice of Removal, without even filing a Motion or otherwise Requesting an Order for Remand, while denying Ms. Parker Brown the most ordinary and elementary equal protections of due process of law.



- (4) Furthermore, it is unclear whether the matters raised by Ratliff and Brown's Notice of Removal are exclusively Civil or Criminal, Mixed Civil and Criminal, or entirely or partially "quasi-criminal" in nature.
- (5) In order to comply with the letter of the criminal removal statute 28 U.S.C. §1455, and with the history and spirit of all civil removal statutes, but especially 28 U.S.C. §1446,
- (6) This Court hereby ORDERS AND ADJUDGES that a full-evidentiary hearing is not merely warranted but necessary, and
- (7) The Court accordingly ORDERS SUCH HEARING SPECIALLY SET for six hours of presentation of evidence and arguments, to begin at 9:00 a.m. on \_\_\_\_\_ and to continue at 2:00 p.m. on \_\_\_\_\_ until all evidence and arguments have been presented.

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(8) Done and ordered in Chambers, in and for the United States District Court for the Eastern District of Louisiana in New Orleans, on this \_\_\_\_\_ day of \_\_\_\_\_ 2023.

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LANCE M. AFRICK  
UNITED STATES DISTRICT JUDGE  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
NEW ORLEANS