

COPY

UNITED STATES DISTRICT COURT AND BANKRUPTCY COURT  
FOR THE DISTRICT OF COLUMBIA

PLAINTIFF

Oscar Dantzler  
P.O. Box 1786  
Hammond, La 70404  
985-215-1508  
[oscardantzler@yahoo.com](mailto:oscardantzler@yahoo.com)

Case: 1:20-cv-01629 JURY DEMAND  
Assigned To : Lamberth, Royce C.  
Assign. Date : 6/17/2020  
Description: Employ. Discrim. (H-DECK)

VERSUS

DEPENDANTS

THE TANGIPAHOA PARISH SCHOOL BOARD, THROUGH ROBIN ABRAMS INDIVIDUALLY AND IN HER COMPACTY AS THE BOARD MEMBER, AND THE TANGIPAHOA PARISH SCHOOL BOARD, THROUGH SANDRA BAILEY SIMMONS INDIVIDUALLY AND IN HER COMPACTY AS THE BOARD MEMBER, AND THE TANGIPAHOA PARISH SCHOOL BOARD, THROUGH RANDY BUSH INDIVIDUALLY AND IN HIS COMPACTY AS THE BOARD MEMBER, AND THE TANGIPAHOA PARISH SCHOOL BOARD, THROUGH ROSE DOMINGUEZ INDIVIDUALLY AND IN HER COMPACTY AS THE BOARD MEMBER, AND THE TANGIPAHOA PARISH SCHOOL BOARD, THROUGH BRETT DUNCAN INDIVIDUALLY AND IN HER COMPACTY AS THE BOARD MEMBER, AND THE TANGIPAHOA PARISH SCHOOL BOARD, THROUGH JERRY MOORE INDIVIDUALLY AND IN HIS COMPACTY AS THE BOARD MEMBER, AND THE TANGIPAHOA PARISH SCHOOL BOARD, THROUGH JANIC FULTZ RICHARDS INDIVIDUALLY AND IN HER COMPACTY AS THE BOARD MEMBER, AND THE TANGIPAHOA PARISH SCHOOL BOARD, THROUGH TOM TOLAR INDIVIDUALLY AND IN HIS COMPACTY AS THE BOARD MEMBER, AND THE TANGIPAHOA PARISH SCHOOL BOARD, THROUGH GLENN WESTMORELAND INDIVIDUALLY AND IN HIS COMPACTY AS THE BOARD MEMBER, AND THE TANGIPAHOA PARISH SCHOOL SYSTEM, THROUGH MELISSA STILLEY INDIVIDUALLY AND IN HER COMPACTY AS THE SUPERINTENDENT, AND THE TANGIPAHOA PARISH SCHOOL SYSTEM, THROUGH BYRON HURST INDIVIDUALLY AND IN HIS COMPACTY AS THE ASSISTANT SUPERINTENDENT, AND THE TANGIPAHOA PARISH SCHOOL SYSTEM, THROUGH RONALD GENCO INDIVIDUALLY AND IN HIS COMPACTY AS THE ASSISTANT SUPERINTENDENT, AND THE TANGIPAHOA PARISH SCHOOL SYSTEM, THROUGH ANDREW JACKSON INDIVIDUALLY AND IN HIS COMPACTY AS THE CHIEF DESEGREGATION OFFICER, AND THE T.P.S.S. THROUGH GAVIN VITTER INDIVIDUALLY AND IN HIS COMPACTY AS THE DIRECTOR FOR THE HUMAN RESOURCE DEPARTMENT, AND THE T.P.S.S. THROUGH BYRON MUSE INDIVIDUALLY AND IN HIS COMPACTY AS THE DIRECTOR FOR TRANSPORTATION DEPARTMENT, AND THE UNITED STATES DEPARTMENT OF JUSTICE OFFICE, AND THE UNITED STATES DEPARTMENT OF JUSTICE OFFICE THROUGH THE ATTORNEY GENERAL WILLIAM P. BARR'S INDIVIDUALLY AND IN HIS COMPACTY AS THE U. S. ATTORNEY GENERAL AND THEIR AGENTS ONE -FIVE, AND THE UNITED STATES FEDERAL BUREAU INVESTIGATION OFFICE THROUGH CHRISTOPHER A. WRAY INDIVIDUALLY

AND IN HIS COMPACTY AS THE U. S. F. B. I. DIRECTOR AND THEIR AGENTS ONE-FIVE, AND THE UNITED STATES FEDERAL BUREAU INVESTIGATION OFFICE THROUGH BRYAN A. VORNDRAN INDIVIDUALLY AND IN HIS COMPACTY AS THE U. S. F. B. I. SPECIAL AGENT AND THEIR AGENTS ONE-FIVE, AND THE LOUISIANA COMMISSION OF HUMAN RIGHTS OFFICE OF THE GOVERNOR THROUGH JOHN BEL EDWARDS AND JOHN BEL EDWARDS INDIVIDUALLY AND IN HIS COMPACTY AS THE STATE OF LOUISIANA GOVERNOR AND THEIR AGENTS ONE-FIVE, AND THE LOUISIANA COMMISSION ON HUMAN RIGHTS, THROUGH DR., LEAH RABY INDIVIDUALLY AND IN HER COMPACTY AS THE EXECUTIVE DIRECTOR, AND THE LOUISIANA COMMISSION OF HUMAN RIGHTS OFFICE THROUGH DEASH GAY, ESQ INDIVIDUALLY AND IN HER COMPACTY AS THE EXECUTIVE ASSISTANT/EQS SUPERVISOR AND THEIR AGENT ONE-FIVE, AND THE LOUISIANA COMMISSION OF HUMAN RIGHTS OFFICE THROUGH CHRISTA DAVID, MPA INDIVIDUALLY AND IN HER COMPACTY AS THE ADMINISTRATIVE ASSISTANT / INTAKE OFFICER AND THEIR AGENT ONE-FIVE, AND THE U.S.E.E.O.C. OFFICE THROUGH TRAVIS NICHOLSON, AND TRAVIS NICHOLSON INDIVIDUALLY AND IN HIS COMPACTY AS THE ACTING DIRECTOR, AND THEIR AGENTS ONE-FIVE, AND THE U.S.E.E.O.C. OFFICE THROUGH KEITH HILLS, AND KEITH HILLS INDIVIDUALLY AND IN HIS COMPACTY AS THE DIRECTOR AND THEIR AGENTS ONE-FIVE, AND THE U.S.E.E.O.C. OFFICE THROUGH RUBY SUSTAITA, AND RUBY SUSTAITA INDIVIDUALLY AND IN HER COMPACTY AS THE REGIONAL ATTORNEY AND THEIR AGENTS ONE-FIVE, AND THE N.A.A.C.P. OFFICE THROUGH MICHAEL MC CLANANHAN INDIVIDUALLY AND IN HIS COMPACTY AS THE STATE OF LOUISIANA PRESIDENT AND THEIR AGENTS ONE THROUGH FIVE, AND THE NATIONAL ASSOCIATION FOR COLOR PEOPLE OFFICE THROUGH DERRICK JOHNSON INDIVIDUALLY AND IN HIS COMPACTY AS THE NATIONAL PRESIDENT AND THEIR AGENTS ONE THROUGH FIVE, AND ET AL

## **COMPLAINT**

The petition of Oscar Dantzler, Jr., a resident of full age of majority of the Parish of Tangipahoa, State of Louisiana, and a citizen in the United States, respectfully shows that:

### **JURISDICTION AND VENUE**

Jurisdiction is founded under the provisions of TITLE VII of the Civil Rights Act of 1964, amended by the Equal Employment Act of 1972 as amended by the Civil Rights Act of 1991 Title 42 U.S.C. Section 1983 and 2000(e) et. Seq., and under Section 704 and Section 706 of the Title VII et. And Jurisdiction is founded under pursuant to 5 U.S.C. § 552 and La. R.S. 44:1, Jurisdiction is founded under the provisions of Fraud in Silence, and Jurisdiction is founded pursuant to 28 U.S.C. § 1332 Jurisdiction is founded under the provisions of State of Louisiana Election Code; Jurisdiction is founded pursuant to 28 U.S.C. § 1343(a)1,2,3,4, (b)1,2 and under the Provisions of 28 U.S.C. § 1391, and pursuant to 28 U.S.C. 1361, 28 U.S.C. 1651(a)(b) Title 42 U.S.C. Section 1983 and 1985(3), and Title 28 U.S.C.S., 534, and, 535(b), (b) 2 and Code of Civil Procedure Articles 3861, and 3863, and 3864, and causes of action arising under the First and Fourteenth Amendment to The United States Constitution of America and it extends the provisions of the Fifth Amendment's Due Process Clause and makes them applicable to the states. Jurisdiction is also founded pursuant to 18 U.S.C. 1961-1968, and title 18 U.S.C.A. § 242 and pursuant to 28 U.S.C. Section 1391(a)(e), and 1331, and 1343(3), 2201 and 2202, Federal question, and 28 U.S.C. Section 1367 affording supplemental jurisdiction over Plaintiff's state law claims.

### **REQUEST FOR JUDICIAL NOTICE OF EXHIBITS**

Plaintiff hereby requests the court to take Judicial Notice pursuant to Rule 201,

Federal Rules of Evidence, of all plaintiff's attached Exhibits to support Plaintiff's Petition for COMPLAINT and therefore be made part of this suit.

All listed defendants are a resident of full age of majority of the Parish of Tangipahoa and the Parish of Baton Rouge, State of Louisiana, and a citizen of the United States of America;

Plaintiff reserves his right to amend this petition within the time limits Prescribed by law and thereafter for good cause shown and / correct any error. Misstatements, omissions, or vague allegations which may be contained herein;

Plaintiff shows that he desires and requires that defendants answer or otherwise respond to this suit within the proper time limits prescribe in the F. R. C. Pr.

Plaintiff was hired by the Tangipahoa Parish School System on or about March of 1993 as a school bus driver and thereafter he had received permanent status as a full- time bus driver as a civil service employee. And as of this date of filing plaintiff is still hired as a full- time bus driver with over 30 years of experience.

Plaintiff advises to this Honor Court through out the years of plaintiff working for the school system he has been well respected by his peers and other school officials and most of the time when-ever drivers needed advice on situation involving their job description they would contact me for advice on what to do, because of my experience.

Plaintiff alleges that he has never been written up by his supervisor since he has been employed with the T.P.S.S..

Plaintiff advises this Honorable Court that he has the most seniority and he was the most qualified person for the positions that he had applied for.

Plaintiff have applied for several supervisors positions and other positions that came available in the Transportation Department and other Department , but all were ignored

intentionally by my supervisor and the administration, because of my race and gender ; however plaintiff has never been given an explanation to why he was denied the positions by my supervisors nor no one in the administration.

Plaintiff advises that he have several letters to the Human Resource office, Director Gavin Vitter and prior Human Resource Directors reaching out for Help, but to know avail all were ignored by administration, because of my race and gender and, because of their conspiracy with the other defendants. (Evidence would be shown at trial )

Plaintiff have sent letters and personally meet with the Superintendent, Melissa Stilley concerning the denied of the positions, but to know avail all were ignored intentionally, because of my race, gender, and because of her conspiracy with other defendants. Note ( Evidence would be shown at trial )

Plaintiff advises that the Superintendent, Melissa Stilley was recently appointed as the new superintendent and she had advised the public, the school employees that she would make direct improvement in the school system and that she would make sure that racial discrimination etc., would not occur under her administration, but all to know avail.

Plaintiff advises this Honorable Court that all school Board members, the superintendent, their administration, their Human Resources Department, and their Court Compliance Officer, Chief Desegregation Officer, and the Director of Transportation are well knowledgeable that the plaintiff was the most qualified candidate for the supervisors position that plaintiff had applied for and they are well knowledgeable that plaintiff was appointed as the Chairman for the Bus Drivers Advisory Committee by his peers and, because plaintiff speaks out at the board meeting, and other meeting etc. for the bus drivers. This was announced openly at the School Board Meeting and documented in the minutes.

### DIRECTOR OF TRANSPORTATION DEPARTMENT

Plaintiff advises the Director of Transportation position came available and myself neither another bus driver named Kim Notoriano who had applied for that position who was most qualified and neither one of us got that position it was given to Byron Muse who has never been a school bus driver, did not have a CDL license to drive a school bus, and who was not an employee of the T.P.S.S. . however; he had no knowledge of the transportation department at all.

Plaintiff advises during one interview for the Field Coordinator Position that Byron Muse had conducted the interview process and other bus driver who was jealousy of plaintiff. because of plaintiff relationship with the other bus driver and who did not want to see plaintiff with the position.

Plaintiff advises this Honorable Court no way he could have gotten a good and fair interview for this position.

Plaintiff advises that the Director of Transportation, Byron Muse did not support and recommend plaintiff for the position even thou he knew plaintiff was the most qualified person for the position. because the superintendent had order him not to promote plaintiff.

Plaintiff advises this court that another white female had filed a lawsuit recently against the T.P.S.S., because she was denied the Director of Transportation position and expeditiously her case was settled and she was promoted to a higher position and given a increase in her salary.

( Note ) documents will be shown at trial

Plaintiff have personally meet with the Superintendent, Melissa Stilley concerning the denied of the positions, but to know avail all were ignored intentionally, because of my race, gender, and because of her conspiracy with other defendants.

Plaintiff advises this court that the superintendent requested to meet with plaintiff after he had filed a complaint with the U.S.E.E.O.C. office against the T.P.S.S. and plaintiff met with her

and we talked about the denied positions and other and she also replied to me that the Court Compliance Officer, Andrew Jackson never told her about my complaint and he had never forward to her office my complaint and then she advised me that she had learned of plaintiff complaint after the U.S.E.E.O.C. had sent notice of complaint to her office. but to know avail all were ignored intentionally, because of my race, gender, and because of her conspiracy with other defendants.

Plaintiff alleges to this court that the school officials had sent out text messages to the school employees to support John Bel Edwards for the 2019 Governor's Race. **In return defendant would make sure plaintiff's case against the T.P.S.S. would be dismissed against the T.P.S.S. without finding no violations of the statutes from his L.C.H.R. office nor the U.S.E.E.O.C office.**

Plaintiff alleges this court that the superintendent had enough time to correct this problems with plaintiff and / or U.S.E.E.O.C. mediation officer, but to know avail all were ignored intentionally, because of my race, gender, and because of her conspiracy with the other defendants. Especially the communication she had with the Governor, John Bel Edwards during the 2019 Governor' election.

**Plaintiff alleges to this court that T.P.S..B members, and the superintendent, and their agents have conspired with the Governor, (L.C.H.R. Office) John Bel Edwards to circumvent plaintiff's case against the Tangipahoa Parish School Board, because of the agreement J.B.E. has made with the school officials to support him in the 2019 governor's election and he ( defendant) would make sure plaintiff's case against the T.P.S.S. would be dismissed against the T.P.S.S. without finding no violations of the statutes from his L.C.H.R. office. And the U.S.E.E.O.C**

**Court Compliance Officer  
Chief Desegregation Implementation Officer**

Plaintiff advises this Honorable Court that the T.P.S.S. was and is still under a Federal Desegregation Court Order ( Joyce Moore v. T.P.S.S.) for Racial Discrimination during the time plaintiff was being denied these several position that he had applied for, however; The Transportation Department was also mention in this court order that plaintiff's has a claim under.

Plaintiff strongly believes that he has civil right claims under the Joyce Marie Moore, et al versus the Tangipahoa Parish School Board Civil Action Number 65-15556

### **Court Compliance Officer & Chief Desegregation Implementation Officer**

Court Compliance Officer and the Chief Desegregation Officer has a mandatory duty to investigate and enforce any and all racial discrimination complaint that come to their office., but to know avail when it came to plaintiff's complaint.

Plaintiff alleges that he has sent letters and personally meet with the Chief Desegregation Officer, Rev. Andrew Jackson, and Donald Massey, but to know avail all were ignored by him because of my race, gender and because of his conspiracy with the other defendants. Note ( Evidence would be shown at trial )

Plaintiff advises this court that the T.P.S.S. and their agents have refused to give plaintiff a copy of his test results and they have refused to interview plaintiff for other supervisor position that came available without any explanation.

Plaintiff have filed a charge of Discrimination with the U.S.E.E.O.C. on August 08, 2019 charge # 461-2019-02441 a continuing Action of retaliation as earliest October 01, 2018 and latest February 21, 2019, etc.... ( See Exhibit ( A )

Plaintiff have received Determination Right to Sue Letter from the Louisiana Commission of Human Rights office of the Governor. John Bel Edwards dated March 25, 2020 and this court should also noticed the date of their letter ( See Exhibit ( A A )

### **Plaintiff Action against the U.S.E.E.O.C. Office, Et al**

The **U.S.E.E.O.C. Office** is an organ of the national government, has the commensurate responsibility to vigilantly support and defend the Constitution. and the Court will not interpret Title VII of the Civil Rights Act of 1964, as amended in manner inconsistent with this Responsibilities....

***Plaintiff advises this honorable Court that the U.S.E.E.O.C. office and their agents had a Mandatory duty to investigate plaintiff's claims and to meet with the Plaintiff as required by Federal and State laws in which all were interfered with.***

***Plaintiff had filed a complaint/charge with the U.S.E.E.O.C. office in New Orleans on the 08 day of August 2019 against the T.P.S.B. ( SEE ATTACHED EXHIBIT A )***



*Plaintiff have sent several letters to the U.S.E.E.O.C. Office, to Travis Nicholson, acting Director, and to the Director, Keith Hills, and the region attorney, Mr. Rudy Sustaita and their agents, requesting information of plaintiff's charge lodge with their office, but to know avail all was ignored intentionally, by the directors to their agents, because of their conspiracy with the Governor, (L.C.H.R.) John Bel Edwards to circumvent plaintiff's case against the Tangipahoa Parish School Board, because of the agreement J.B.E. has made with the school officials to support him in the 2019 governor's election and he ( defendant) would make sure plaintiff's case against the T.P.S.S. would be dismissed against the T.P.S.S. without finding no violations of the statutes from his L.C.H.R. office. And the U.S.E.E.O.C. officials have never responded to my letters as of this date of filing these proceedings ( SEE ATTACHED EXHIBIT B )*

**1. Plaintiff Action Against the Louisiana Commissioner of Human Rights /Office of Governor John Bel Edwards, John Bel Edwards, Et al**

*Plaintiff advises this honorable Court that the L.C.H.R. office and their agents had a Mandatory duty to investigate plaintiff's claims and to meet with the Plaintiff as required by Federal and State laws in which all were interfered with.*

*Plaintiff have sent several letters to the L.C.H.R. Office of John Bel Edwards, to the EXECUTIVE DIRECTOR, Dr. Leah Raby, EXECUTIVE ASSISTANT/EOS SUPERVISOR, Desha Gay, Esq., and ADMINSTRATIE ASSISTANT /INTAKE OFFICER, Christa David, MPA and their agents, requesting information of plaintiff's charge lodge with their office, but to know avail all was ignored intentionally, by the executive director to her agents, because of their conspiracy with the Governor, John Bel Edwards and with the U.S.E.E.O.C. agents to circumvent plaintiff's case against the Tangipahoa Parish School Board, because of the agreement J.B.E. had made with the school officials to support him in the 2019*

governor's election and he would make sure plaintiff's case against the T.P.S.S. would be dismissed against the T.P.S.S. without finding no violations of the statutes from his L.C.H.R. office. L.C.H.R. officials have not responded to plaintiff's letters nor has an agent met with plaintiff to discuss the merit of plaintiff charge as of this date of filing these proceedings ( SEE ATTACHED EXHIBIT C & D )

2. Plaintiff Action Against the Louisiana Commissioner of Human Rights /Office of Governor John Bel Edwards, John Bel Edwards, Et al

Plaintiff alleges to this Honorable Court that he had received information from a knowledgeable person that the Office of John Bel Edwards have had plaintiff's U.S.E.E.O.C. complaint over six months ago. However; last week I received a phone call from an investigator from the Office of the Governor, John Bel Edwards from the Louisiana Commission of Humans Rights stating that he would be handling plaintiff's U.S.E.E.O.C. complaint against the T.P.S.S., but he would not give me no information concerning my case. Plaintiff have sent numerous of documents to the L.C.H.R. 'S office concerning plaintiff's U.S. E.E.O.C. complaint against the T.P.S.S. and plaintiff yet to get a response back from him nor an agent concerning the documents and or status of my case as of this date and time ( See attached letter sent to the L.C.H.R. office Exhibit C & D ).

Plaintiff advises that plaintiff was a candidate for the governor's race for the 2019 election and plaintiff had ran against John Bel Edward and because of plaintiff enter the race it had to go into a second primary.

Plaintiff advises that several teachers had advised plaintiff that they did not know I was running, because they had received a text message from the School officials advising them to support John Bel Edwards for the governor's race for the 2019 election.

Plaintiff advise how did the governor know about plaintiff's U.S.E.E.O.C. complaint and why would he request for plaintiff's case against the T.P.S.S. be sent directly to the L.C.H.R., office under his direct control after plaintiff had ran against him.

Plaintiff strongly believe that this is a conflict of interest and abusive power of the

Plaintiff have sent letters by fax on 3-2-2020 and by certified mail to the L.C.H.R. Office of John Bel Edwards reaching out for help from someone in their office, but to know avail no one never responded back to me.( SEE EXHIBIT ( C & D ) )

Plaintiff have sent another letter and supporting documents sent by fax on 3-19-2020 and by certified mail to the L.C.H.R. Office of John Bel Edwards reaching out for help from someone in their office, but to know avail no one never responded back to me. . ( SEE EXHIBIT ( C & D ) )

Plaintiff advises that the governor, John Bel Edwards has shown an ongoing retaliatory pattern of conspiracy with his agents of the L.C.H.R office of the Governor and with the U.S.E.E.O.C. office and their agents to dismiss plaintiff's U.S.E.E.O.C. claims without a cause of action and/ or without finding a violation under TITLE VII STATUTES, because of his conspiracy with the Tangipahoa Parish School Superintendent in return for votes to support him in the 2019 Governor's race and by plaintiff enter the Governor's race that caused a run off. ( SEE EXHIBIT ( E ) ) the Right to Sue Letter from his Office.

(NOTE)

Plaintiff have sent last notification of documents that strongly supported plaintiff Charge to the L.C.H.R. office on or about March 19, 2020 and expeditiously an agent from L.C.H.R. office sent a determination letter from their L.C.H.R. Office dated and signed on or about March 25, 2020 stating they couldn't find a violation or a cause of action and/ or without finding a violation under TITLE VII STATUTES. ( SEE EXHIBIT ( E ) )

Plaintiff strongly believe that this is abuse of the Governor's elective power.

Plaintiff strongly believe that this is also a violation of plaintiff's Civil rights under the U.S. Federal Constitution and a violation of plaintiff's Civil rights under the State of Louisiana Constitution and the Board of Ethics Laws.

Plaintiff believe that this is conspiracy against him and plaintiff think that this is complaint that falls under the R.I.C.O. ACT.

Plaintiff advises and shows this court that the defendants has shown an intentionally continuing, retaliatory, conspiracy criminal pattern that falls under the RICO ACT.

Plaintiff alleges to this honorable court that The Governor is head of the L.C.H.R. office, and he appoints nine commissioners for the L.C.H.R. office. John Bel Edwards has intentionally orchestrated this retaliatory treatment and conspiracy, fraudulent acts against plaintiff with all mention defendants to dismiss plaintiff U.S.E.E.O.C. without finding any violation of statutes, etc. as mention in above statements, and attachments

Plaintiff action against the N.A.A.C.P. and their agents, Et al....

NAACP is a well recognize Civil Rights organization throughout the United States that is specialize in representing individuals in violation of their Civil Rights and Race

**Discrimination, and other especially to an African Americans. The N.A.A.C.P. has bylaws that govern their Charter to represent African Americans of violation of their Civil Rights and Race Discrimination ect.....**

**The N.A.A.C.P. has a mandatory duty to represent Plaintiff as a member and as an African American who has alleged violation of plaintiff's Civil Rights and Race Discrimination Charge, etc... filed with the U.S.E.E.O.C. office.**

**The N.A.A.C.P. has went against their own bylaws by not representing Plaintiff, because of their conspiracy with the Governor, John Bel Edwards. Plaintiff is a member of the N.A.A.C.P. and Plaintiff deserves representation from them. Plaintiff have sent several letters to their office seeking representation from their office concerning plaintiff's U.S.E.E.O.C. complaint, but all to know avail they refuse to represent plaintiff, they have never responded back to plaintiff's letters, because of their relationship with the governor, John Bel Edwards. ( SEE ATTACHED EXHIBIT ( F's ) )**

**( NOTE)**

**Plaintiff alleges and It is my opinion and it should be notice that the Governor have given to the N.A.A.C.P. hundred thousand of dollars to support him for the 2019 Governor's Election.**

**Plaintiff's action against the U.S.F.B.I. Office and their agents, Et al. Plaintiff have sent letters to their office reaching out for help, because of the violation of my civil rights and the criminal activities against plaintiff by the defendants , but to know avail all was ignored by them, because of their conspiracy with defendants. (Evidence would be shown at trial ) ( see below narrative.....**

**Plaintiff's action against the U.S.D.O.J. Office and their agents, Et al. Plaintiff have sent letters to their office reaching out for help, because of the violation of my civil rights and the criminal activities against plaintiff by the defendants , but to know avail all was ignored by them, because of their conspiracy with defendants. (Evidence would be shown at trial ) ( see below narrative.....**

**..**

**The plaintiff, Oscar Dantzler, presents with respect that the named defendant(s) are justly and truly indebted unto him for damages in amount to be determine by the trier of the facts for liability for conspiracy to violate his civil rights under color of law, intentional infliction of emotional distress, and other tortuous acts as set forth in Plaintiff' s Complaint and/or referred to herein:**

Some of the above defendants are constitutionally and democratically elected district officials, and some are appointed officer and some are not elected officials, and some are elective officials, and some are state agencies who are not immune from suit for damages, and plaintiff shows that some defendants can act only through its agents and that it liable for the acts of its agents under the theory of respondent superior, and/or but are subject to injunctive relief by the courts and /or any other relief the court may find.

**All of the transactions and events relevant to the plaintiff's complaint occurred in and about the Tangipahoa Parish, Baton Rouge Parish Eastern District of Louisiana., and the United States of America, and Washington, D.C.**

Plaintiff advise this court that the defendants, ( no one), in fact made any effort whatsoever to bring the unlawful activity to halt, in fact the defendants have helped- encourage in an on going conspiracy way and abetted with The Governor, John Bel Edwards in their wrongful actions involving conspiracy.

Plaintiff further advises this court that the defendants Supported the wrongful actions of the Governor, John Bel Edwards and the defendants Have exhibited wanton and willful disregard for the Rules of the Court Procedures and for the justice system and not only did defendants Engage in the conspiracy with the Governor against

plaintiff, in which they had knowledge of, they resorted to engage in subterfuge, albeit a very easily discernible form, in an attempt to circumvent plaintiffs (claims) under the provisions of Title VII and other Federal and State claims under the U.S. Federal Constitution.

### **CONSPIRACY**

Plaintiff shows that no direct evidence of the existence of a conspiracy between the named defendants is necessary, and that a jury can infer from the circumstances of this case that there exist a conspiracy between some or all of the defendants to commit illegal malicious acts which violated the plaintiff constitutional rights under color of law and that those persons who are not immune from damages can be assed for damages regardless of the immunity of their conspirators and despite the fact that those are immune might be the only conspirators cloaked with legal authority. Plaintiff need not prove that every conspirator knew the exact details of the plan or the identity of all the participants, so long as the conspirators shared some of the conspiratorial objectives. **HAMPTON vs. HANRAHAN 600 F2 nd 600, 620-623 (7<sup>th</sup> Cir.1979)cert. denied 446 US 754 (1980)**

### **LAW AND ARGUMENTS**

With regards to such notice and opportunity to be heard to which petitioner. Oscar Dantzler is entitled by both the Federal Constitution and the Constitution of the State of Louisiana as well as the laws, statutes, and Rules of the courts of State which provides and guarantee due process, equal protection and access to the courts it is noted herein and set forth herein

Plaintiff alleges that the action of defendants deprived plaintiff of his clearly established right to due process and equal protection of the laws, guarantee to him pursuant to the Fourteenth Amendment to the U. S. Constitution and to petition

the government for redress of grievances under the First Amendment to the U. S. Constitution and Louisiana Constitution Article I., Section 2. All which defendants interfered with.

Plaintiff alleges at all times pertinent hereto, plaintiff enjoyed a clearly established right to life, liberty, property, and to confront his accusers, and the pursuit of happiness under the Fourteenth Amendments to the U. S. Constitution and a freedom of association under the First Amendment to the U. S. Constitution, all of which defendants impaired and interfered with.

Plaintiff alleges that at all times pertinent hereto, defendants were person (s) acting under color of the law within the meaning and intent of 42 U.S.C. § 1983. Plaintiff alleges conspiracy to continue to overlook plaintiff's U.S.E.E.O.C. claims and to dismiss plaintiff's claims without finding a cause of action under the provision of U.S.E.E.O.C. Title VII federal Laws and other laws intentionally by not responding back to plaintiff's letters nor meeting with plaintiff which was motivated by defendants conspiracy with one another, because of my race, black that cause a deprivation of equal protection of the laws that caused injury to plaintiff within the meaning and intent under the provision of 42 U.S.C.1985. The actions of defendants served to impair and interfere with plaintiff's clearly established rights in violation of 42 U.S.C. § 1983 and 42 U.S.C. 1985(3).

Plaintiff believes that defendant(s), (no one), in fact made any effort whatsoever to bring the unlawful activity to halt, in fact the defendant(s) have helped- encourage in an on going conspiracy way and abetted the defendants officials, et al, in their wrongful actions by

conspiracy.

Plaintiff further believes that defendant(s) supported the wrongful actions of the defendant(s) and they have exhibited wanton and willful disregard for the Rules of the state Court Procedures and for the justice system and not only did defendant(s) deny the Plaintiff' s Equal Due Process of Law, in which they had knowledge of, they resorted to engage in subterfuge, albeit a very easily discernible form, in an attempt to circumvent plaintiff' s (claims), to Due Process of Law, by conspiracy.

#### **Title 28 U.S.C. § 1361,**

This federal statute permit's the plaintiff or/and any citizen to file a lawsuit in the federal courts to obtain a court order requiring a federal official to perform a mandatory duty and to halt unlawful acts. This statute is Title 28 U.S.C. § 1361. Action to compel an officer of the U. S. to perform his duty. The district courts shall have original jurisdiction of any action in the nature of mandamus to compel an officer or employee of the United States or any agency thereof to perform a duty owed to the plaintiff

#### **28 U.S.C. § 1651**

Writs (a) The Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law. (b) An alternative writ or rule nisi may be issued by a justice or judge of a court which has jurisdiction. (June 25, 1948, ch. 646, 62 Stat. 944; May 24, 1949, ch. 139, Sec. 90, 63 Stat. 102.)



Title 28 U.S.C.S. §1391(e) provides for venue for actions in the nature of mandamus brought under Title 28 USCS § 1361 against federal officers, employees, or agencies, or any agency thereof acting in its official capacity or under color of legal authority. Plaintiff for all of the relief set forth in his petition ( COMPLAINT), which he seeks to compel the afore-mentioned defendant(s) to perform their duty owed to the plaintiff as required by law.

The defendants, (federal agencies ) has a clear and present legal duty (i.e., nondiscretionary ministerial and statutory requirement) under Title 28 U.S.C.S. § 535 (b) to report any information, allegation, and complaint relating to violations of civil rights guaranteed by the Fourteenth Amendment to the U. S. Constitution, and 42 U.S.C. section 1983, and 1985(3) , 18 U.S.C. 242, and the laws of the U. S., by officials acting under color of law, to the United States Attorney General.

The defendants, ( federal agencies) has refused, intentionally and deliberatively and continues to refused, to comply with the requirements of Title 28 U.S.C. § 535 (b) to continue to conceal my criminal complaint.

Plaintiff is entitled to relief sought, because, as is more fully shown in his verified petition. there is no genuine issue of material facts that needs to be tried in this action. Furthermore, there are no affirmative defense available to the defendants, F.B.I., in that, Title 28 USCS § 535(b) establishes that agents of the defendants have a clear and present legal duty under to report any information, allegation and complaint relating to violations of federal criminal law involving government officers and employees to the U. S. Attorney General. In spite of the statutory requirement to document plaintiff's complaint, the F.B.I. has refused and continues to refused to document my complaint.

Plaintiff continues to suffer and incur damages as a result of the deprivation of civil rights guaranteed him by the Fourteenth Amendment to the U. S. Constitution by law enforcement officials, and federal officials, and other individual acting under color of law

Unless the U.S.F. B. I., is compelled to perform their duty' Plaintiff is likely to sustain further irreparable harm, including death, in that the plaintiff is terminally ill, and the ongoing abuse, which is more fully described in the related complaint, continues to this day. Plaintiff has suffered a dramatic acceleration of his illness, which can only be attributed to the circumstances and events particular to this matter.

Plaintiff has exhausted all available remedies prior to seeking mandamus relief; and, he believes that any further efforts to obtain relief from local agencies and state court, and federal courts will likely result in serious reprisals against him for making allegations of wrongdoing on the part of local law enforcement agencies, elective officials and federal officials, as occurred in the past and present. For this reason, requirements for exhaustion of effort to obtain local relief should be considered waived and satisfied. ( Heckler v. Ringer 466 U.S. 602 ( 1984)

Plaintiff is seeking mandamus relief against defendants, U.S. F. B. I. and agent does one through five, who refused to fulfill their statutory responsibilities under Title 28 U.S.C. § 535, by refusing to document plaintiff's allegations of deprivation of certain rights and protections guaranteed to him by the Fourteenth Amendment to the U. S. Constitution, and 42 U.S.C. section 1983, and 1985(3) , 18 U.S.C. 242, and the laws of the United States, by officials acting under color of law, and for failing to take actions within the legal limits of their authority

Plaintiff is seeking relief against respondents (federal officers, ) who refused to

fulfill their sworn obligation, and present legal duty (i.e., nondiscretionary ministerial and statutory requirement) under Title 28 USC 1343(1)(2)(3), and the U. S. Federal constitution, to enforce the U.S. Constitution, any allegations, and complaint relating to violations of plaintiff's civil rights guaranteed by the Fourteenth Amendment to the U. S., and 42 U.S.C. section 1983, and 1985(3), 18 U.S.C. 242, and the laws of the United States, by officials acting under color of law,.

Title 28 USC 535 mandates and governs the investigation of crimes involving government officers and employees. It authorizes the Attorney General and the F. B. I. to investigate any information, allegation, matter, or complaint witnessed, discovered, or received, relating to violations of federal criminal law involving government officers and employees, and, requires the head of the F.B.I., or the witness, discover, or recipient, to expeditiously report these violations to the attorney General, as appropriate.

The Federal Bureau of Investigation, is an organ of the national government, has the commensurate responsibility to vigilantly support and defend the Constitution, and the Court will not interpret Title 28 U.S.C. § 534 in manner inconsistent with this Responsibilities [Tarlton v. Saxbe (1974) 165 US App DC 293, 504 F2d 1116]. Exclusively

Plaintiff is a citizen of the United States, and is a victim, as defined by Title 42 U.S.C.A. § 10607 (e) (2), for purposes of providing the services described in the Attorney General Guidelines for Victim and Witness Assistance and, as defined by Title 42 U.S.C. § 10607 (e) (2), for purpose of enforcing the rights enumerate

Defendants, U.S.F B I is an agency of the United States of America and are components of U. S. Department of Justice.

Defendants, AGENT DOES ONE through FIVE, are officers, agents and/or

employees of the U.S. courts, and FBI, and the D.O.J. acting within the scope of their office or employment, and are being sued individually and each in their official capacity, for the negligent and/ or wrongful acts and/or omissions occurring in connection with the performance of their duties, which resulted from their refusal to take the required actions that would have identified the plaintiff as a victim of crime, within the meaning of Title 42 U.S.C. § 10607 (b) (1).

As agents acting on behalf of the F. B. I, Defendants, AGENT DOES ONE through FIVE, have, and at all relevant times described herein had, a clear and present legal duty (i.e., nondiscretionary ministerial and statutory requirement) under Title 28 U.S.C. § 535 to report any information, allegation, and complaint relating to violations of federal criminal law and civil rights, by official acting under color of law, to the Civil Right Division of the Department of Justice.

Defendants, AGENT DOES ONE through FIVE, have, and at all relevant times described herein had, the present ability to perform the above-described duty.

Defendants, trial courts, and U.S.F. B. I., is, and at all relevant times described herein was, the appropriate venue for the plaintiff to bring his complaint for violations of federal and state criminal law and of his civil rights, by official acting under color of law, is that:

Title 42 U.S.C.A. § 14141 allows the United States to remedy a pattern or practice of conduct by any governmental authority, or any agent thereof, or any person acting on behalf of a governmental authority, including law enforcement officers, who deprive a person of their constitutionally guaranteed rights.

The U.S.D.O.J., is an organ of the national government, has the commensurate responsibility to vigilantly support and defend the Constitution, and the Court will not interpret

the law in manner inconsistent with this Responsibilities

Plaintiff sent letters to the U.S.F.B.I. , U.S.D.O.J., crying out for help, but to know avail all were ignored by defendants. ( Evidence would be shown at trial )

Therefore plaintiff request a Writ of Mandamus ordering the U.S.F.B.I., U.S.D.O.J. and their agents one-five to conduct a proper investigation of my claims.

In all cases, the afore-mentioned defendants refused to document plaintiff's complaint, without proffering a tenable explanation.

Given the refusal of the U.S.F. B. I. and the U.S.D.O.J.to properly and effectively investigate the complaints and allegation of the plaintiff and bring the perpetrators to justice, in accordance with the law and its own policies, and given further other substantial indicators of acquiescence by the Department of Justice in the abuses described in plaintiff's complaint, and its unwillingness to support legal initiatives that might be undertaken to obtain relief for the plaintiff, any further efforts on the part of the plaintiff to secure remedies through these venues would be futile

#### **MEMORANDUM OF POINTS AND AUTHORITIES**

Plaintiff, Oscar Dantzer, in support of his petition ( complaint) for writ of mandate, which seeks an order from this court to compel the U.S.D.O.J., and the U.S.F. B. I.. and their agents, the U.S.E.E.O.C. office and their agents, and the L.C.H.R. office and their agents. and the N.A.A.C.P. and their agents, to perform their Statutory duty owed to the plaintiff under The U.S. Federal Constitution and the Constitution of the State of Louisiana;

#### **Submits the following Memorandum of points and Authorities:**

- A. Relief in nature of mandamus under Title 28 U.S.C.A. § 1361 was appropriate in action against federal officials and state officials alleging failure to discharge their duty, since plaintiff sought only to require federal officers and state officers to perform ministerial duty of complying with their own regulations. [Legal Aid Soc'y V. Brennan (1979, CA9

Cal) 608 F2d 1319, 21 BNA FEP Cas 605, 21 CCH EPD paragraph 30443, cert den (1980) 447 US 921, 656 L Ed 2d 1112, 100 S Ct 3010, 22 BNA FEP Cas 1832, 23 CCH EDP paragraph 30977]

- B. District Court had jurisdiction under 28 USCS & 1361 of third-party action who sought to compel federal and state officials to fulfill their affirmative duty under federal statutes; to extent that third-party plaintiffs alleged that defendants federal officers, state officers acted unconstitutionally and outside ambit of their statutory authority, and sought relief to correct such actions, suit was "in the nature of mandamus" so as to bring it within purview of & 1361. [Kelley v. metropolitan County Board of Education (1973, MD Tenn) 372 F Supp 528]
- D. When complaint is predicated upon Mandamus Act (28 USCS § 1361), it is essential that plaintiff allege and show that government owes him performance of legal duty "so plainly prescribed as to be free from doubt." [Naporano metal & Iron Co. v. Secretary of Labor (1976, CA3 NJ) 529 F2d 537, 41 ALR Fed 597; Commonwealth of Pennsylvania, By Sheppard v. National Ass'n of Flood Insurers (1975, CA3 Pa) 520 F2d 11, 20 FR Serv 2d 601]
- E. A state law enforcement agency may be enjoined from committing constitutional violations where there is proof that officers within the agency have engaged in a persistent pattern of misconduct. [Thomas v. County of Los Angeles, 978 F.2d 504, 508-509 (9<sup>th</sup> Cir. 1993)]
- F. The Supreme Court has repeatedly upheld the appropriateness of federal injunctive relief to combat a 'pattern' of illicit law enforcement behavior. [Pennsylvania v. Porter, 659 F. 2d 306 (3<sup>rd</sup> Cir. 1981)]
- G. The method in which the U.S.F.B.I , conducts investigations of violations civil rights violations by state actors, and the criteria for mandating an investigation, is prescribed in the united States Attorneys' manual, Title 7, Civil Rights Resource Manual, § 42.
- H. The U.S.D.O.J., and U.S. F. B. I. office, and agent has failed to document and respond to my Complaints As was required by law.

## **MANDAMUS**

### **Art. 3861. Provides;**

Mandamus is a writ directing a public officer or a corporation or an officer

thereof to perform any of the duties set forth in Articles 3863 and 3864.

Art. 3863. Provides;

A writ of mandamus may be directed to a public officer to compel the performance of a ministerial duty required by law, or to a former officer or his heirs to compel the delivery of the papers and effects of the office to his successor."

In Taube vs. St. Charles Parish School Board, 00-1805( La. App. 5 Cir.4/11/01);787

So.2d 377, the court, at page 380, discussed the Writ of Mandamus:

A writ of mandamus may be directed to a public officer to compel the performance of a ministerial duty required by law. La. C.C.P. arts.3861, 3863. A writ of mandamus is properly issued only when the law provides no relief by ordinary means or when the delay involved in obtaining ordinary relief may cause injustice La. C.C.P. arts.3862. Thus , a writ of mandamus is appropriately issued against a public officer (1) when the public officer has refused to perform a ministerial duty that is clearly provided by law, and (2) when a mandamus is the only available remedy or the delay caused by the use of any other remedy would cause injustice. Both requirements must be met in order for a court to properly make a writ of mandamus peremptory. Taube, 767 So.2d at 821.

The defendants (federal officers, ) has a clear sworn obligation, and present legal duty (i.e., nondiscretionary ministerial and statutory requirement) under the U.S. Federal Constitution, and under Title 28 USC 1343(1)(2)( 3), to enforce the U.S. Constitution, any allegations, and complaint relating to violations of plaintiff's civil rights guaranteed by the Fourteenth Amendment to the U. S. Constitution and 42 U.S.C. section 1983, and 1985(3) , 18 U.S.C. 242, 28 USC 1391(e) and the laws of the United States, by officials acting under color of law,.

**28 USC 1343(1)(2)(3) (provides)**

(a) The district courts shall have original jurisdiction of any civil action authorized by law to be commenced by any person: (1) To recover damages for injury to his person or property, or because of the deprivation of any right or privilege of a citizen of the United States, by any act done in furtherance of any conspiracy mentioned in section 1985 of Title 42; (2) To recover damages from any person who fails to prevent or to aid in preventing any wrongs mentioned in section 1985 of Title 42 which he had knowledge were about to occur and power to prevent; (3) To redress the deprivation, under color of any State law, statute, ordinance, regulation, custom or usage, of any right, privilege or immunity secured by the Constitution of the United States or by any Act of Congress providing for equal rights of citizens or of all persons within the jurisdiction of the United States; (4) To recover damages or to secure equitable or other relief under any Act of Congress providing for the protection of civil rights.

Plaintiff believes that defendant(s), (no one), in fact made any effort whatsoever to bring the unlawful activity to halt, in fact the defendant(s) have helped- encourage in an on going conspiracy way and abetted the defendants officials, et al, in their wrongful actions by conspiracy.

Plaintiff further believes that defendant(s) supported the wrongful

actions of the defendant(s) and they have exhibited wanton and willful disregard for the Rules of the state Court Procedures and for the justice system and not only did defendant(s) deny the Plaintiff's Equal Due Process of Law, in which they had knowledge of, they resorted to engage in subterfuge, albeit a very easily discernible form, in an attempt to circumvent plaintiff's (claims), to Due Process of Law, by conspiracy

### **CONCLUSION**

Therefore, plaintiff request a Writ of Mandamus ordering all the defendants, and their employees, agents to do what is required of defendants to do pursuant to the law and an order ordering for defendants not to continue this type of misconduct in the future.

Plaintiff is entitled to the issuance of a Writ of Mandamus ordering and directing the above defendants (parties) to do what they are required to do pursuant to the law

Consequently, plaintiff has no plain, speedy, and adequate remedy in the ordinary course of the law other to request the court to compel official action by a Writ of Mandamus order.

Plaintiff asserts that a writ of mandamus is appropriate because (1) he has sufficiently established his clear and indisputable right to the relief sought, (2) the defendants have a statutory mandate to fulfill that right, and (3) the plaintiff has no other adequate remedy available to him.

Plaintiff requests from this Honorable Court a Trial by Jury.

Plaintiff requests A Writ of Mandamus be issue ordering the L.C.H.R. office and their agent to recall the U.S.E.E.O.C. Determination Right to Sue Letter signed and dated on March 25, 2020, because their office did not do a though investigation of plaintiff charge intentionally, because of the (defendants) Conspiracy with the Governor, John Bell Edwards to circumvent plaintiff's U.S.E.E.O.C. claims;

### **WHEREFORE, plaintiff prays that;**

1. A Writ of Mandamus be issue ordering and directing the above defendants (parties) to do what they are required to do pursuant to the law.
2. A Writ of Mandamus be issue ordering the United States Federal District Court, to stay any/and/ or all pending matters, pleadings, and motions and/or until plaintiff's Writ of



Mandamus is heard for the best interest of justice.

3. A Writ of Mandamus be issue pursuant to Title 28 U.S.C.S 1361(B), ordering defendants, the U.S. F.B.I. and appropriate agents and or/person acting on their behalf, to perform it duty owe to plaintiff under title 28 U.S.C. 535 within fifteen (15) day of the date of this order; or, in the alternative, order the aforementioned defendants to appear before this court and show cause why they should not do so,
4. A Writ of Mandamus be issue ordering aforementioned defendants and their agents does one-five, to provide a reasonably sufficient explanation for their past refusal to uphold the provision of title 28 U.S.C. 535 and for their failure to perform their statutory duty ,as prescribe therein;
5. A Writ of Mandamus be issue ordering aforementioned defendants and their agents does one-five, to make known to plaintiff and this court, upon forwarding his complaint, the determination by the civil rights division of the department of justice, and in particular, as to whether the department will request a criminal civil rights investigation by the aforementioned defendants or whether the division will decline criminal prosecution in favor of an administrative inquiry:
6. A Writ of Mandamus be issue pursuant to title 18 U.S.C. 3771(d)(3)ordering aforementioned defendants , D.O.J., Attorney General to enforce the right to be reasonable protected from the accused afforded to the plaintiff under title 18 U.S.C 3771(a), by designing a person(s) in the D.O.J. or (responsible official) pursuant to title 42 U.S.C. 10607(a), to provide the plaintiff with the services required by federal law and the attorney general guidelines for victim and witness assistance, immediately upon receipt of the order;
7. A Writ of Mandamus be issue granting an injunction pursuant to Tittle 18 U.S.C. 3771(d) (3), ordering the aforementioned (caption) defendants and their agents does one-five, and the Attorney general of the United States, to take and investigate plaintiff complaint. pursuant to title 18 U.S.C. 3771(f)(2), for the willful and wanton failure of defendants, to protect the aforementioned rights of the plaintiff.
8. A Writ of Mandamus be issue pursuant to Title 28 U.S.C.S 1361, ordering defendants, and appropriate agents and or/person acting on their behalf, to perform it duty owe to plaintiff or, in the alternative, order the aforementioned defendants to appear before this court and show cause why they should not do so,
9. A Writ of Mandamus be issue pursuant to Title 42 U.S.C. 10607(e)(2) ordering defendants, and appropriate agents and or/person acting on their behalf, to perform it duty owe to plaintiff or, in the alternative, order the aforementioned defendants to appear before this court and show cause why they should not do so,
10. A Writ of Mandamus be issue pursuant to Title 42 U.S.C. 14141 ordering defendants, the U.S., and appropriate agents and or/person acting on their behalf, to perform it duty owe to plaintiff or, in the alternative, order the aforementioned defendants to appear before this court and show cause why they should not do so,

11. A Writ of Mandamus be issue ordering and directing the above defendants (parties) not to continue to retaliate, harass nor violate plaintiff's civil rights no further.
12. A Writ of Mandamus be issue ordering the L.C.H.R. office and their agent to recall the U.S.E.E.O.C. Determination Right to Sue Letter signed and dated on March 25, 2020,
  3. because their office did not do a though investigation of my charge intentionally, because of their Conspiracy with the Governor, John Bel Edwards to circumvent plaintiff's U.S.E.E.O.C. claims;
  4. because the L.C.H.R. office and their agent are under direct control of the governor;
  3. because the Governor, John Bel Edwards ordered the conspiracy against plaintiff;
    - a. because of his agreement he had made with the T.P.S.S. officials if they supported him for the 2019 Governor's Election he would make sure that plaintiff's U.S.E.E.O.C. claims would be dismissed without finding any violation of any statutes;
    - b. because plaintiff had entered the 2019 Governor race and ran against him;
    - c. because of plaintiff entered into the race it had to go into a second primary;
    - d. because plaintiff had run advertisement against him and him brother showing the corruption of their family;
13. A Writ of Mandamus be issue ordering plaintiff relief in connection with his civil rights claims.
14. A Writ of Mandamus be issue ordering the defendant(s), U.S.D.O.J.. and the U.S.F.B.I. and their agents to investigate the criminal activity under the R.I.C.O. ACT
15. A Writ of Mandamus be issued ordering the all defendant(s) to show cause why they refused to do a though investigation of plaintiff's claims under the provision of the Title VII Civil Rights Act of 1964 , as amended et.....
16. A Writ of Mandamus be issued ordering the defendant(s) NAACP to investigate the Allege violation of plaintiff's U.S. Federal Constitution civil rights claims under the provision of the Title VII Civil Rights Act of 1964, as amended and to give plaintiff representation on plaintiff's U.S.E.E.O.C. complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Oscar Dantzler", written over a horizontal line.

OSCAR C. DANTZLER, JR. PRO SE  
1203 Apple Street  
Post Office Box 1786  
Hammond, Louisiana 70403  
(985)-215-1508  
Email-Oscardantzler@yahoo.com

STATE OF LOUISIANA

PARISH OF TANGIPAHOA

**VERIFICATION**

**BEFORE ME, Notary Public, personally came and appeared  
OSCAR DANTZLER**

**A resident of the full age of majority of Tangipahoa Parish,  
Louisiana, who upon being duly sworn did depose and state that he  
is the plaintiff in the above foregoing complaint, that he has read  
the same, and all facts and allegations contained therein are true  
and correct to the best of his knowledge, information, belief. \_**

  
\_\_\_\_\_

**SWORN TO AND SUBSCRIBED before me, Notary Public, this \_**

**30 DAY OF April, 2020.**

  
\_\_\_\_\_  
**NOTARY PUBLIC**



**CHARGE OF DISCRIMINATION**

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐

FEPA

☒

EEOC

**461-2019-02441****Louisiana Commission On Human Rights**

and EEOC

State or local Agency, if any

Name (Indicate Mr., Ms., Mrs.)

**Mr. Oscar Dantzler**

Home Phone (Incl. Area Code)

**(985) 215-1508**

Date of Birth

**1968**

Street Address

City, State and ZIP Code

**1203 Apple Street, Hammond, LA 70404**

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

**TANGIPAHOA PARISH SCHOOL DISTRICT**

No. Employees, Members

**500 or More**

Phone No. (Include Area Code)

**(985) 748-2423**

Street Address

City, State and ZIP Code

**59656 PULESTON ROAD, Amite, LA 70422**

Name

No. Employees, Members

Phone No. (Include Area Code)

Street Address

City, State and ZIP Code

DISCRIMINATION BASED ON (Check appropriate box(es).)

☒

RACE

☐

COLOR

☒

SEX

☐

RELIGION

☐

NATIONAL ORIGIN

☒

RETALIATION

☐

AGE

☐

DISABILITY

☐

GENETIC INFORMATION

☐

OTHER (Specify)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

**10-01-2018****02-21-2019**☒

CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)).

I began my employment with Tangipahoa Parish School District in 1993, as a Bus Driver. Throughout my employment, I have been vocal and served as Chairperson on the Bus Driver Advisor Committee speaking out about discriminatory and unfair labor practices at the School District. Since October 2018, I have applied for several promotional positions. I was not selected for any position I applied for, despite being highly qualified, having seniority, and more experience than the individuals hired. Two of the positions I applied for were given to white females, and one was given to a black female.

No reason was given as to why I was not selected.

I believe I have been discriminated against because of my sex, male, my race, black, and that I have been retaliated against in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

**Aug 08, 2019**

Date

Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(month, day, year)

**Exhibit A**

State of Louisiana  
LOUISIANA COMMISSION ON HUMAN RIGHTS  
Post Office Box 94094 Baton Rouge, Louisiana 70804-9094

Oscar Dantzler  
P.O. Box 1786  
Hammond, LA 70404



U.S. POSTAGE & PRIVATE BOWES  
ZIP 70802 \$ 000.50  
02 4M  
0000361960 MAR 30 2020

70404\$1786 3019

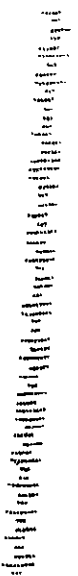


Exhibit AA

## LOUISIANA COMMISSION ON HUMAN RIGHTS

## DISMISSAL AND NOTICE OF RIGHTS

To: **Oscar Dantzler**  
**P.O. Box 1786**  
**Hammond, LA 70404**

From: **Louisiana Commission On Human Rights**  
**P.O. Box 94094**  
**Baton Rouge, LA 70804**



On behalf of person(s) aggrieved whose identity is  
**CONFIDENTIAL (29 CFR §1601.7(a))**

LCHR Complaint No.

LCHR Representative

Telephone No

**461-2019-02441****Harry Landry, III, Esq.****(225) 342-6969****THE LCHR IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the LCHR.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with LCHR; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The LCHR issues the following determination: Based upon its investigation, the LCHR is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

**- NOTICE OF SUIT RIGHTS AND APPEAL -**

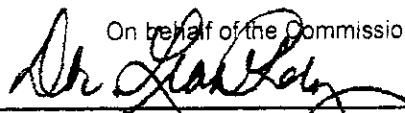
(See the additional information attached to this form.)

**Appeal:** As your charge was filed under [Title VII of the Civil Rights Act (and/or) the ADA (and the ADEA)], which (is/are) enforced by the LCHR, you have the right to request EEOC review of this action. To secure a review, you must request it in writing to U.S. EEOC New Orleans Field Office at 1555 Poydras, Suite 1900 NO, LA 70112. Your request must be submitted within 15 days of the date of this letter.

**Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

  
**Dr. Leah Raby,**  
**Executive Director**

**03/25/2020**

(Date Mailed)

Enclosures(s)

TRANSMISSION VERIFICATION REPORT

TIME : 01/08/2020 15:32  
NAME : SPEEDWAY 3  
FAX : 9853450608  
TEL : 9853450651  
SER.# : U63274D4J664881

DATE, TIME	01/08 15:31
FAX NO./NAME	15045952884
DURATION	00:00:53
PAGE(S)	02
RESULT	OK
MODE	STANDARD
	ECM

Exhibit B's



TRANSMISSION VERIFICATION REPORT

TIME : 01/09/2020 12:47  
NAME : SPEEDWAY 3  
FAX : 9853450608  
TEL : 9853450651  
SER.# : U63274D4J664881

DATE, TIME	01/09 12:46
FAX NO./NAME	15045952884
DURATION	00:00:24
PAGE(S)	02
RESULT	OK
MODE	STANDARD ECM

**CERTIFIED MAIL # 70192280000161580613**

**Charge # 461-2019-02441**

**Oscar Dantzler**

**Oscar Dantzler**

**P.O. Box 1786**

**1203 Apple Street**

**Hammond, La. 70404**

**Hammond, La. 70401**

**985-215-1508**

**985-215-1508**

**Email- oscardantzler@yahoo.com**

**ATTN: U.S.E.E.O.C. New Orleans District Office 701 Loyola Avenue, Suite 600**

**TO: DIRECTOR, Mr. Keith Hill**

**TO: REGIONAL ATTORNEY, Mr. Rudy Sustaita**

**1-800-669-4000-off. And 504-595-2884-fax**

Dear U.S.E.E.O.C. Agents, and Attorney{s} I, Oscar Dantzler filed a charge { Charge # 461-2019-02441 } with your office on August 08, 2019 against the T.P.S.S. and no one from your office has contacted me as of this date 01-08-2020 and time of the faxing and/or mailing of this letter to discuss the status of my charge. Just for the record the T.P.S.S. is previously under a Desegregation Federal Court Order ( Joyce Marie Moore vs. T.P.S.S.) and the transportation is part of this Order. First, I need to know what is going on with my charge. Secondly, I would like to know who is or /and was handling my charge, because I need their complete name{s}. Third, I need to know why I have never been contacted as of the 01 -08-2020 by you nor your agents. Fourth, I need to know if my case has been transferred to another jurisdiction and what was the reason and why I have-not received a letter from your office advising me of the transfer. Fifth, If my case has been transferred, what date it was transferred and why and please provide me with the agent's complete name, address, telephone and fax # and the name and complete address of the other jurisdiction where my charge # has been lodge. I have called and left messages on numerous occassion, but to know avail. Would you please, respond by letter and please have all 5 questions answer in writing in your response. Would you please, respond within three days after you or someone in your office receive this memo.

**I Remain, Oscar Dantzler**



B

TRANSMISSION VERIFICATION REPORT

TIME : 03/02/2020 14:40  
NAME : SPEEDWAY 3  
FAX : 9853450600  
TEL : 9853450651  
SER.# : U63274D4J664891

DATE, TIME	03/02 14:38
FAX NO./NAME	12253422063
DURATION	00:01:27
PAGE(S)	02
RESULT	OK
MODE	STANDARD ECM

Exhibit C

**CERTIFIED MAIL # 70192280000161580606**

**Charge # 461-2019-02441**

**Oscar Dantzler**

**Oscar Dantzler**

**P.O. Box 1786**

**1203 Apple Street**

**Hammond, La. 70404**

**Hammond, La. 70401**

**985-215-1508**

**985-215-1508**

**Email- oscardantzler@yahoo.com**

**Attn: Louisiana Commissioner of Human Rights /Office of Governor John Bel Edwards, 1001 N. 23 St. Baton Rouge, La. 70802**

**TO: EXECUTIVE DIRECTOR, Dr. Leah Raby**

**TO: EXECUTIVE ASSISTANT/EOS SUPERVISOR, Desha Gay, Esq.**

**TO: ADMINSTRATIE ASSISTANT /INTAKE OFFICER, Christa David, MPA**

**225-342-6969-off. / 225-342-2063-fax**

Dear Agents, and Attorney(s) of the LCHR'S Office, I, Oscar Dantzler has filed a charge { Charge # 461-2019-02441 } with one of your E.E.O.C. office on August 08, 2019 against the T.P.S.S. and no one from your E.E.O.C. office has contacted me as of this date 01-08-2020 and time of the faxing and/or mailing of this letter to discuss the status of my charge. Just for the record the T.P.S.S. is previously under a Desegregation Federal Court Order ( Joyce Marie Moore vs. T.P.S.S.) and the transportation is part of this Order First, I need to know what is going on with my charge. Secondly, I would like to know who is or /and was handling my charge, because I need their complete name(s). Third, I need to know why I have never been contacted as of the 01-08-2020 by you nor your agents if my case has been transferred to LCHR'S jurisdiction. Fourth, I need to know if my case has been transferred to LCHR'S jurisdiction and what was the reason and why, because I have-not received a letter from your office advising me of the transfer. Fifth, if my case has been transferred, what date it was transferred and why and please provide me with the agent's complete name, address, fax & telephone # and the name and complete address of the LCHR'S jurisdiction where my charge # has been lodge. I have called and left messages on numerous occassion, but to know avail. Would you please, respond by letter and have all 5 questions answer in writing in your response. Would you please, respond within 3 days after you or someone in your office receive this memo.

**I Remain, Oscar Dantzler**



C.

**CERTIFIED MAIL # 70192280000161580606**

**Charge # 461-2019-02441**

**Oscar Dantzler**

**Oscar Dantzler**

**P.O. Box 1786**

**1203 Apple Street**

**Hammond, La. 70404**

**Hammond, La. 70401**

**985-215-1508**

**985-215-1508**

**Email- oscardantzler@yahoo.com**

**Attn: Louisiana Commissioner of Human Rights /Office of Governor John Bel Edwards, 1001 N. 23 St. Baton Rouge, La. 70802**

**TO: EXECUTIVE DIRECTOR, Dr. Leah Raby**

**TO: EXECUTIVE ASSISTANT/EOS SUPERVISOR, Desha Gay, Esq.**

**TO: ADMINSTRATIE ASSISTANT /INTAKE OFFICER, Christa David, MPA**

**225-342-6969-off. / 225-342-2063-fax**

Dear Agents, and Attorney{s} of the LCHR'S Office, I, Oscar Dantzler has filed a charge { Charge # 461-2019-02441 } with one of your E.E.O.C. office on August 08, 2019 against the T.P.S.S. and no one from the E.E.O.C. office has contacted me as of this date 03-02-2020 and time to discuss the status of my charge. I request a letter stating when this office received my complaint against the T.P.S.S. from the U.S.E.E.O.C office of New Orleans. I am also requesting the investigator's name and phone number from your LCHR's, office who is handling my case. I also need to know did the U.S.E.E.O.C. New Orleans office send over my entire complaint file along with all attached document that I had supplied them with to support my charge. Also I need to know did the New Orleans office agent or director send over the Respondent's response to my charge if so I would like for you or someone from your office to provide me with a copy of said documents and if not I need to know did someone from your LCHR's office request from the respondent's their response to my charge. Would you or someone from your office respond to my mention statements and supply me with all said documents within 24 hrs. by faxing to 985-345-0608 or by email to oscardantzler@yahoo.com.

**I Remain, Oscar Dantzler**



TRANSMISSION VERIFICATION REPORT

TIME : 03/19/2020 17:24  
NAME : SPEEDWAY 3  
FAX : 9853450608  
TEL : 9853450651  
SER.# : U63274D4J664881

DATE, TIME  
FAX NO./NAME  
DURATION  
PAGE(S)  
RESULT  
MODE

03/19 17:13  
12253422063  
00:10:26  
23  
OK  
STANDARD  
ECM

Exhibit D

CERTIFIED MAIL # 7019 2280 0001 6158 1399 Charge # 461-2019-02441

Oscar Dantzler

Oscar Dantzler

P.O. Box 1786

1203 Apple Street

Hammond, La. 70404

Hammond, La. 70401

985-215-1508

985-215-1508

Email- oscardantzler@yahoo.com

Attn: Louisiana Commissioner of Human Rights /Office of Governor John Bel Edwards, 1001 N. 23 St. Baton Rouge, La. 70802

TO: EXECUTIVE DIRECTOR, Dr. Leah Raby

TO: EXECUTIVE ASSISTANT/EOS SUPERVISOR, Desha Gay, Esq.


TO: ADMINISTRATIVE ASSISTANT /INTAKE OFFICER, Christa David, MPA

225-342-6969-off. / 225-342-2063-fax

Dear Agents, and Attorney{s} of the LCHR'S Office, of record I am Oscar Dantzler and I am resubmitting the same documents into your office that I had submitted and file with my charge with the U.S.E.E.O.C. against the T.P.S.S.. These attached documents strongly support my charge. I am requesting again that a thorough investigation be done from this office, due to the attached documents that I have supplied your office with. I request an in-person meeting with you or your agent who is handling my case to discuss the merit of my case. I request a response within 24hrs. after your office receive this memo if an in-person meeting would take place. You could fax to 985-345-0608 or by email to oscardantzler@yahoo.com. Your response.

{ Attached  
Total of 21 Documents }

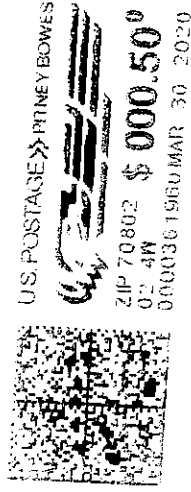
I Remain as always,



Oscar Dantzler

State of Louisiana  
LOUISIANA COMMISSION ON HUMAN RIGHTS  
Post Office Box 94094 Baton Rouge, Louisiana 70804-9094

Oscar Dantzler  
P.O. Box 1786  
Hammond, LA 70404



70404\$1786 B019

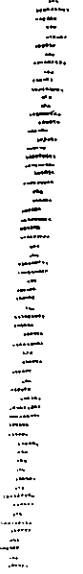


Exhibit E



## LOUISIANA COMMISSION ON HUMAN RIGHTS

## DISMISSAL AND NOTICE OF RIGHTS

To: **Oscar Dantzler**  
**P.O. Box 1786**  
**Hammond, LA 70404**

From: **Louisiana Commission On Human Rights**  
**P.O. Box 94094**  
**Baton Rouge, LA 70804**

☐

On behalf of person(s) aggrieved whose identity is  
**CONFIDENTIAL (29 CFR §1601.7(a))**

LCHR Complaint No.

LCHR Representative

Telephone No

**461-2019-02441****Harry Landry, III, Esq.****(225) 342-6969****THE LCHR IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

- ☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the LCHR.
- ☐ Your allegations did not involve a disability as defined by the Americans With Disabilities Act
- ☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- ☐ Your charge was not timely filed with LCHR. In other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- ☒ The LCHR issues the following determination: Based upon its investigation, the LCHR is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☐ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge
- ☐ Other (briefly state)

**- NOTICE OF SUIT RIGHTS AND APPEAL -**

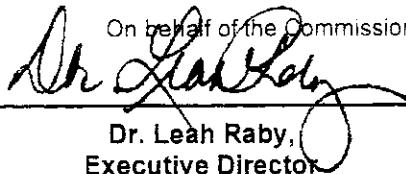
(See the additional information attached to this form.)

**Appeal:** As your charge was filed under [Title VII of the Civil Rights Act (and/or) the ADA (and the ADEA)], which (is/are) enforced by the LCHR, you have the right to request EEOC review of this action. To secure a review, you must request it in writing to U.S. EEOC New Orleans Field Office at 1555 Poydras, Suite 1900 NO, LA 70112. Your request must be submitted within 15 days of the date of this letter.

**Title VII, the Americans with Disabilities Act, and/or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a state claim may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

  
**Dr. Leah Raby,**  
**Executive Director**

**03/25/2020**

(Date Mailed)

Enclosures(s)

CERTIFIED MAIL # 70192280000161580538

Charge # 461-2019-02441

Oscar Dantzler

Oscar Dantzler

P.O. Box 1786

1203 Apple Street

Hammond, La. 70404

Hammond, La. 70401

985-215-1508

985-215-1508

Email- [oscardantzler@yahoo.com](mailto:oscardantzler@yahoo.com)

ATTN: N.A.A.C.P., Agents, Dr., Ernest L. Johnson, Sr. and Micheal W. Mc Clanahan

3313 Government Street

Baton Rouge, La. 70806

1-225-334-7490-off

Dear N.A.A.C.P., Agents, Dr., Ernest L. Johnson, Sr. and Micheal W.

Mc Clanahan. I, Oscar Dantzler filed a charge { Charge # 461-2019-02441 } with one of the U.S.E.E.O.C. Office in New Orleans, La. On August 08, 2019 against the T.P.S.S. and no one from the E.E.O.C. office has contacted me as of this date 01-21-2020 and time of the faxing and/or mailing of this letter to discuss the status of my charge. ( SEE EXHIBIT A ). The T.P.S.S. is previously under a Federal Court Order Desegregation case Moore vs. T.P.S.S. ( SEE EXHIBIT B), especially the Transportation Department in which I have a charge filed with U.S.E.E.O.C. ( SEE EXHIBIT A ). ( See attachments ) I have sent letters to the Human Resource Department. I have personally meet with the Superintendent and the Chief Desegregation Enforcement Officer also to try to get help concerning the denied of promotions and other, but to know avail. My complaint was denied and conceal by them. The Chief Desegregation Enforcement Officer should have supported me and recommended me to be promoted for the new supervisors positions and other, due to me being the most qualify candidate for the position and according to the Federal Court Order that he was appointed to enforce. Also the Director and the E.E.O.C. Agents has concealed my complaint intentionally, because of their conspiracy with the TPSS employees. I strongly believe that my civil rights have been violated by all parties mention and by the Government officials. I need and request your urgent support and representation on my complaint with E.E.O.C.. I request that your office would accept jurisdiction of my case and investigate the violations of my civil rights. Would you please, respond by letter within three days after you or someone in your office receive this memo.

I Remain, Dr., Oscar Dantzler



985-215-1508

Exhibit F's

**CERTIFIED MAIL # 70192280000161580552**

**Charge # 461-2019-02441**

**Oscar Dantzler**

**Oscar Dantzler**

**P.O. Box 1786**

**1203 Apple Street**

**Hammond, La. 70404**

**Hammond, La. 70401**

**985-215-1508**

**985-215-1508**

**Email- oscardantzler@yahoo.com**

**ATTN: N.A.A.C.P., President, Derick Johnson, and Agents**

**4805 Mt. Hope Dr.**

**Baltimore, MD. 21215**

**1-410-580-5777-off**

Dear N.A.A.C.P., President Derick Johnson and Agents. I, Oscar Dantzler filed a charge { Charge # 461-2019-02441 } with one of the U.S.E.E.O.C. Office in New Orleans, La. On August 08, 2019 against the T.P.S.S. and no one from the E.E.O.C. office has contacted me as of this date 01-21-2020 and time of the faxing and/or mailing of this letter to discuss the status of my charge. ( SEE EXHIBIT A ). The T.P.S.S. is previously under a Federal Court Order Desegregation case Moore vs. T.P.S.S. ( SEE EXHIBIT B ), especially the Transportation Department in which I have a charge filed with U.S.E.E.O.C. ( SEE EXHIBIT A ). ( See attachments ) I have sent letters to the Human Resource Department. I have personally meet with the Superintendent and the Chief Desegregation Enforcement Officer also to try to get help concerning the denied of promotions and other, but to know avail. My complaint was denied and conceal by them. The Chief Desegregation Enforcement Officer should have supported me and recommended me to be promoted for the new supervisors positions and other, due to me being the most qualify candidate for the position and according to the Federal Court Order that he was appointed to enforce. Also the Director and the E.E.O.C. Agents has concealed my complaint intentionally, because of their conspiracy with the TPSS employees. I strongly believe that my civil rights have been violated by all parties mention and by the Government officials. I need and request your urgent support and representation on my complaint with E.E.O.C.. I request that your office would accept jurisdiction of my case and investigate the violations of my civil rights. Would you please, respond by letter within three days after you or someone in your office receive this memo.

I Remain, Dr., Oscar Dantzler



---

**985-215-1508**