

19TH JUDICIAL DISTRICT COURT
CIVIL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE

SUIT NO. C-721-385 DIVISION
STATE OF LOUISIANA
BELINDA PARKER-BROWN, ZENA CRENSHAW LOGAL, AND ERROL VICTOR,
SR.

VERSUS

THE STATE OF LOUISIANA AND THE HONORABLE JUDGE DENNIS WALDRON,
PRESIDING IN HIS OFFICIAL CAPACITY OVER THE 40TH JUDICIAL DISTRICT
COURT FOR THE PARISH OF ST. JOHN THE BAPTIST IN THE STATE OF
LOUISIANA
DIV.: "B", CASE NO. 2010-CR-2010, STATE OF LOUISIANA V. ERROL VICTOR, SR.

FILED: _____

DEPUTY CLERK

FIRST AMENDED PETITION FOR INJUNCTION AND DECLARATORY RELIEF,
VERIFIED WITH REQUEST FOR EX PARTE TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION

NOW INTO COURT comes Petitioners BELINDA PARKER-BROWN, ZENA
CRENSHAW LOGAL AND ERROL VICTOR, SR., separately and *pro se*, and for their
respective Cause of Action for Injunction pursuant to Louisiana Code of Civil Procedure, Article
3601 (La. C.C.P. Art. 3601) with declaratory relief, say as follows:

I.
The Petitioners

1. Petitioner **Belinda Parker-Brown** (*hereinafter Parker-Brown*) is domiciled in the State of Louisiana, City of Slidell, St. Tammany Parish. She is Co-Founder and CEO of Louisiana United International, Inc. (LUI)¹, a nonprofit corporation headquartered in Slidell, Louisiana and organized under the laws of the State of Louisiana. LUI functions as a membership-based civil, constitutional, and human rights advocate on a local, state-wide, national, and international basis. Both Parker-Brown and LUI are committed to combating private sector as well as public sector corruption in America, including but not limited to all forms of illegal bias, particularly against its members. Co-Petitioner Errol Victor, Sr. (*hereinafter Victor*) is a LUI member and has been so for several years preceding the

¹ Learn more at <https://www.launitedi.org>

petition at hand. Victor was, like several LUI members and many more of its constituents were prosecuted by the State of Louisiana and purportedly convicted for one or more serious crimes by a less than unanimous jury verdict;

2. Petitioner **Zena D. Crenshaw-Logal, J.D.** (*hereinafter Crenshaw-Logal*) is domiciled in the State of Georgia, City of Atlanta, Fulton County. She has a Juris Doctorate degree, became licensed by the State of Indiana to practice law in October 1984, and in 1998 became a full-time human rights defender after gaining substantial experience as a plaintiff's complex civil trial attorney. On October 2, 2004, Crenshaw-Logal was suspended from the practice of law for a period of thirty (30) days for purportedly impugning a state as well as a federal judicial officer in approximately 1997 with regard to related legal matters. She has yet to seek reinstatement to the Indiana bar of attorneys. On October 10, 2018, the U.N. Human Rights Council (UNHRCouncil) confirmed that it is not manifestly ill-founded to contend that Crenshaw-Logal's referenced discipline was in retaliation for her good government advocacy focused on appropriately expanding judicial accountability in America. She is LUI's Assistant Chief of Operations and leads the organization's collaboration with National Judicial Conduct and Disability Law Project, Inc. (NJCDLP)² which Crenshaw-Logal co-founded and has served as Executive Director since 2005. LUI closely collaborates with NJCDLP in addressing as a human rights matter America's undisputed lack of effective redress for organized, persistent U.S. legal system abuse facilitated by unchecked judicial misconduct. On July 8, 2022, Crenshaw-Logal joined Co-Petitioner Parker-Brown as a signatory to a complaint before the UNHRCouncil on behalf of "Reverend Errol Victor, Sr., (then) incarcerated at the Orleans Parish Jail @ New Orleans, Louisiana, United States of America (USA), and all currently as well as formerly incarcerated citizens of the USA he represents, them having been, like Victor, subjected to a vindictive criminal prosecution by one or more state and/or federal USA criminal prosecutors based on a constitutionally prohibited standard and effectuated by the improperly discriminating prosecutor(s) through illegal means including

² Learn more at <https://www.njcdlp.org>

apparent collusion between one or more of the prosecutors and one or more state and/or federal USA judicial officers acting in their respective official capacity to deliberately deter or thwart proof as to one or more of the referenced victims' actual innocence in regard to the crime(s) underlying their respective, improper prosecution." A copy of the complaint is attached hereto and incorporated herein by reference as Petitioners' Exhibit A (*with 10 page attachment*);

3. Petitioner **Errol Victor, Sr.** (Victor) is an African American in the custody of the State of Louisiana and defendant in *State of Louisiana v. Victor*, No. 2010-CR-2010 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana, Division "B", Ad Hoc Judge Dennis Waldron presiding. Despite Victor's direct, on the record challenges of the court's jurisdiction to proceed, jury selection commenced in that matter on Monday – July 11, 2022 and after this petition was filed, on Wednesday – July 20, 2022, trial of the case culminated with a purported jury verdict against Victor finding him guilty of second degree murder while engaged in the perpetration of the crime of cruelty to a juvenile, in violation of La. R.S. 14:30.1(A)(2)(b);

II. **Procedural History**

4. On or about September 22, 2009, the State of Louisiana charged Victor by grand jury indictment with second degree murder while engaged in the perpetration of the crime of cruelty to a juvenile, in violation of La. R.S. 14:30.1(A)(2)(b);
5. The charges ostensibly stem from the tragic death on April 1, 2008 of Victor's stepson, M.L. Lloyd III;
6. The 2009 case was allotted to Division "B" under case number 2010-CR-172 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana;
7. On August 1, 2014, Victor was purportedly convicted as charged by a non-unanimous jury verdict, ten (10) jurors voting to and two (2) jurors voting not to convict him (*hereinafter 10-2 verdict*). On September 15, 2014, Victor was accordingly sentenced to life

imprisonment at hard labor, without the benefit of parole, probation, or suspension of sentence;

8. Victor appealed the August 2014 conviction to the Louisiana Fifth Circuit Court of Appeal which affirmed his conviction on May 26, 2016. He petitioned the Louisiana Supreme Court which considered and denied his corresponding application for writ on October 15, 2018. On November 6, 2018, Victor filed for reconsideration of that denial which motion was denied on February 11, 2019;
9. On May 9, 2019, Victor filed a Petition for Writ of Certiorari with the United States Supreme Court challenging the referenced decision of the Louisiana Fifth Circuit Court of Appeal under 18 U.S.C. § 1257;
10. On April 27, 2020, the United States Supreme Court granted certiorari on Victor's petition, vacated the May 26, 2016 judgment of the Louisiana Fifth Circuit Court of Appeal, and remanded the case for further consideration in light of *Ramos v. Louisiana*, 590 U.S. _____ (2020);
11. On June 19, 2020, the Louisiana Fifth Circuit vacated Victor's August 1, 2014 sentence and conviction pursuant to the U.S. Supreme Court ruling in *Ramos*;

III.

Each Petitioner's good faith arguments for extension, modification or reversal of certain existing law(s) and/or applications thereof in response to non-unanimous criminal convictions in light of *Ramos v. Louisiana*, 590 U.S. _____ (2020)

12. Ordinarily, "(a) mistrial may be ordered, and in a jury case the jury dismissed, when . . . (t)he jury is unable to agree upon a verdict". *La. C.Cr.P. Art. 775, §(2)*;
13. In 1982, the U.S. Supreme Court explained that such a development signals a "difference of opinion . . . among the jurors" and confirmed that "(a) deadlocked jury . . . does not result in an acquittal barring retrial under the Double Jeopardy Clause." *Tibbs v. Fla.*, 457 U.S. 31 at 42 (1982);

14. The *Tibbs Court* also noted that “the Double Jeopardy Clause does not require society to pay the high price of freeing every defendant whose first trial was tainted by prosecutorial error”. *Id. at 44*;
15. Neither Petitioner proposes such a sweeping result. In fact, this petition countenances a carving of limited exceptions from exceptional circumstances;
16. The State of Louisiana has acknowledged that unlawful discrimination against African Americans based on race was a motivating factor in its adoption of non-unanimity rules for criminal convictions. *See, Ramos v. Louisiana*, 140 S. Ct. 1390 at 1394 (2020);
17. And Victor’s ongoing prosecution is soundly cast as a prototype of vindictive criminal prosecutions in America, both fueled by racial animus and reliant on illegal tactics including but not limited to improper collusion between one or more unlawfully discriminating prosecutors with one or more presiding judges. *See, Petitioners’ Exhibit A (with 10 page attachment)*;
18. “To permit a second trial after an acquittal, however mistaken the acquittal may have been, would present an unacceptably high risk that the Government, with its vastly superior resources, might wear down the defendant so that ‘even though innocent he may be found guilty’.” *United States v. Scott*, 437 U.S. 82 (1978);
19. A far too common penchant among U.S. criminal prosecutors to use those resources to deter if not totally thwart evidence of a criminal defendant’s actual innocence for reasons far removed from any legitimate government objective aligns with abuses of power that Petitioners Parker-Brown and Crenshaw-Logal endeavor to combat on a professional, full-time basis;
20. When U.S. judges, justices, and/or quasi-judicial officers conspicuously and knowingly/deliberately facilitate the abuses, America lacks effective avenues of redress. The U.N. Human Rights Council confirmed that reality on October 10, 2018 and U.S.

government conceded that judicial oversight shortfall by implication via a draft report to the U.N. Human Rights Committee on January 15, 2021. As far as the Petitioners are aware, that report has not been withdrawn. Nonetheless, the Petitioners petition this Court to afford Victor the protection from Double Jeopardy being denied him and to which he is entitled, plus spare Petitioners Parker-Brown and Crenshaw-Logal further marginalization as well as other injuries as non-lawyer human rights defenders, crisis managers, and social justice advocates should Victor be further denied that protection;

21. The *Ramos Court* emphasizes that “(a) ‘verdict, taken from (less than twelve jurors is) no verdict’ at all”. *Ramos at 1395*;

22. However it appears, the underlying rationale is speculative and makes a mockery of jury *voir dire* as well as resulting jury selections and the administering of juror oaths;

23. It was “Louisiana’s policy judgment that one or two jurors should not have the power to hijack the proceeding and block a conviction based on irrational, idiosyncratic, or irrelevant considerations.” *Ramos v. Louisiana*, Brief of Respondent, No. 18-5924 before the U.S. Supreme Court, p 35;

24. According to the State of Louisiana, the U.S. Supreme Court “found ‘no grounds for believing’ that jurors in the majority would ‘simply refuse to listen’ to reasonable arguments in support of acquittal. *Id.* But the state concluded when a holdout juror “continues to insist upon acquittal without having persuasive reasons in support of [his] position,’ then ‘there is no basis for denigrating the vote of so large a majority of the jury or for refusing to accept their decision . . . as being beyond a reasonable doubt.’ *Id.*” *Ramos v. Louisiana*, Brief of Respondent, p 34 citing *Johnson v. Louisiana*, 406 U.S. 356 (1972);

25. As far as the Petitioners are aware, there is no record and certainly no objective/scientific assessment(s) of specific “reasons” for Victor’s 10-2 verdict in 2014;

26. Instead, what we have is the State of Louisiana's related arguments. The state has explained:

The holdout juror may be noble and a vessel for justice. But it is equally likely that he may be motivated by an irrational interpretation of the evidence, an improper bias for or against the prosecution or defendant, or a desire to nullify the charges notwithstanding compelling evidence of guilt. Maybe this juror is refusing to convict because the prosecutor seemed 'mean' or the defense attorney seemed 'nice.' Or perhaps he refuses to believe a key eyewitness from Smithtown because 'everyone knows that people from Smithtown are no-good liars.' Or maybe he distrusts science and thus disregards overwhelming ballistics or DNA evidence.

Ramos v. Louisiana, Brief of Respondent, p 35.

27. Given this **sheer speculation**, the Petitioners harken to Benjamin Franklin's admonition that "it is better 100 guilty Persons should escape than that one innocent Person should suffer";

28. In a country with no shortage of prisoners and a U.S. state often leading in that regard, it would be prudent to find reasonable doubt preempting a criminal conviction based on one (1) duly selected, sworn, and instructed juror unwilling to convict. Presuming two (2) holdout jurors are merely unreasonable people defies logic and maybe statistical probability; not to mention that at one point acting *pro se*, Victor commandeered three (3) holdout jurors in 2014;

29. What is **unreasonable** is any contention that Victor's purported conviction in 2014 by nonunanimous jury verdict was ever inconsistent with reasonable doubt, was or is not tantamount to an acquittal, and/or signaled a mistrial within the meaning of Louisiana Code of Criminal Procedure, Article 775, section (2). *Cf. La. C.Cr.P. Art. 775, §(2)*;

30. That overturned conviction should operate as an acquittal given its undisputed foundation in institutionalized racism compounded by the compelling evidence set out by Petitioners' Exhibit A (*with 10 page attachment*) that it aligns with a consistent, national pattern of organized U.S. legal system abuse facilitated by unchecked judicial misconduct for which there is no effective, domestic avenues of redress. More specifically the conviction appears to be the product of a vindictive criminal prosecution based on a constitutionally prohibited

standard, effectuated through illegal means including collusion between one or more prosecutors with private individuals including but not limited to lawyers acting as such and/or their respective client(s) as well as judicial officers acting in their respective official capacity to deliberately thwart proof of Victor's actual innocence;

IV.

Petitioners' Irreparable Injury, Entitlement to Relief Sought, and Likelihood of Prevailing on the Merits of this Petition

31. The Petitioners and each of them adopt the foregoing averments and incorporate them herein by reference as if set out fully verbatim;
32. "(T)he double jeopardy problem inheres in the very fact of a second trial for the 'same' offense." *Jeffers v. United States*, 432 U.S. 137 at 151 (1977);
33. Victor has endured and still endures that problem due in no small part to the prospect of prosecutor misconduct and other corruption that started manifesting on April 2, 2008 and remains apparent to date, all attendant to M.L. Lloyd III's death;
34. "Nothing is ever settled until it is settled right." ~ Joseph Rudyard Kipling;
35. It is that simple truth robbing the relentless prosecutions which Petitioners hereby seek to enjoin of their finality. Or rather, that truth given America's disregard of Article 2, paragraph 3(a) and (b) of its International Covenant on Civil and Political Rights (ICCPR) which mandate EFFECTIVE domestic avenues of redress for human rights violations under color of law;
36. According to the International Commission of Jurists, for a nation's avenues of redressing human rights violations to be effective, they "must be prompt, accessible, available before an independent body, and lead to reparation and, where applicable, to cessation of the wrongdoing". ICJ. (2012 December 11-12). The ICJ Declaration on Access to Justice and Right to a Remedy in International Human Rights Systems, p 3 ¶5, ICJ 17th World Congress, accessible as of July 19, 2022 @

<https://njcm.nl/wp-content/uploads/ntm/THE-ICJ-DECLARATION-ON-ACCESS-TO-JUSTICE-AND-RIGHT-TO-A-REMEDY-IN-INTERNATIONAL-HUMAN-RIGHTS-SYSTEMS.pdf>;

37. Obliging the Petitioners or any of them to seek protection of Victor's civil, constitutional, and/or human rights through currently/historically **ineffective** avenues of redress has imposed and continues imposing upon them irreparable injury including but not limited to mental and emotional suffering, anxiety, inconvenience, humiliation, diminished quality of life, as for Victor -- loss of liberty, plus otherwise unwarranted expense;
38. In fact, the harm imposed is fairly considered persecution in a global sense, tantamount at least for Victor to psychological torture;
39. The "lawful sanctions" exception to torture prohibitions "cannot include any sanctions or measures prohibited by relevant international instruments or national legislation." UN Human Rights Council, Report of the Special Rapporteur on torture and other cruel, inhuman, or degrading treatment or punishment, 14 February 2000, A/HRC/43/49, p 20, §IV. 84.(f);
40. As of this petition, jury deliberations have concluded and a purported unanimous verdict of guilty on all charges against Victor has been interposed in *State of Louisiana v. Victor*, No. 2010-CR-2010 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana, Division "B";
41. The defendants have represented that sentencing of Victor will proceed on Tuesday – July 26, 2022 although the Petitioners have reason to believe that event may be but has not been postponed until sometime in September 2022;
42. Petitioners and each of them are entitled to the relief hereby sought and they are likely to prevail on the merits of this case, especially should in the interim U.S. government come into compliance with relevant ICCPR provisions. Petitioner Parker-Brown's and Petitioner Crenshaw-Logal's efforts to help provoke that compliance are underway and promising;

WHEREFORE, the Petitioners and each of them pray:

- a. that this verified petition proceed in accord with the Louisiana Code of Civil Procedure and all applicable law without the Petitioners or either of them being required to furnish security;
- b. for an interim *ex parte* order temporarily restraining the defendants and each of them from in any way purporting to finalize and/or otherwise act in accord with the purported jury verdict interposed against Victor, including but not limited to entering the sentencing phase of and/or sentencing him pursuant to *State of Louisiana v. Victor*, No. 2010-CR-2010 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana, Division "B", at least until such time that this petition can be heard upon separate application for and notice of hearing on the Petitioners' request for preliminary injunction;
- c. at the conclusion of said hearing they be granted a preliminary injunction enjoining the defendants from in any way purporting to finalize and/or otherwise act in accord with the purported jury verdict interposed against Victor in said matter, including but not limited to entering the case's sentencing phase and/or sentencing him, or in any way causing the Petitioners or either of them additional harm whether through violation(s) of one or more of their civil, constitutional, and/or human rights and/or otherwise;
- d. upon discovery and trial they be granted a permanent injunction enjoining the defendants from in any way purporting to finalize and/or otherwise act in accord with the purported jury verdict interposed against Victor in said matter, including but not limited to entering the case's sentencing phase and/or sentencing him, or in any way further causing the Petitioners or either of them additional harm whether through violation(s) of one or more of their civil, constitutional, and/or human rights and/or otherwise;

- e. and further declaring that under the particular circumstances of this case at hand, the aforementioned conviction of 2014 by nonunanimous jury verdict against Victor amounts to an acquittal barring retrial of him under what is referred to in America as the Double Jeopardy Clause. Plus, that the defendants and each of them have acted in violation of that provision upon instituting or facilitating institution of trial via *State of Louisiana v. Victor*, No. 2010-CR-2010 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana, Division "B", and are accordingly obliged to immediately release Victor from custody of the State of Louisiana and otherwise restore his liberty as if said prosecution never commenced; and
- f. for costs of this action plus any and all other relief just and proper upon the premises.

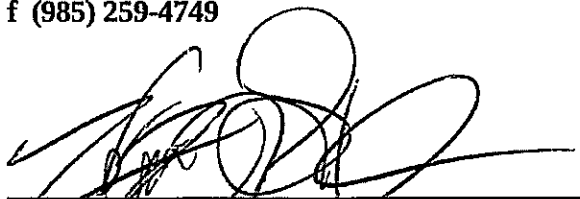
**V.
VERIFICATION**

The Petitioners and each of them affirm under penalties of perjury that all of their foregoing assertions of facts are true and correct to the best of their knowledge and belief.

Respectfully Submitted,

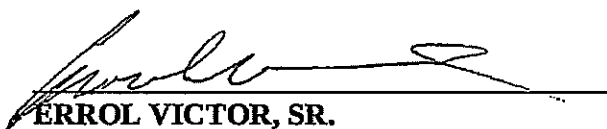


BELINDA PARKER-BROWN
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and



ERROL VICTOR, SR.
(Self Represented Litigant)
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christina@deservesjustice.net
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f (985) 259-4749

Certificate of Service

Comes now undersigned, Self represented Petitioner Belinda Parker-Brown and certifies that on the 25th day of July, 2022, a true and accurate copy of the foregoing Petition with Petitioners' Exhibit A (*with 10 page attachment*), a corresponding Civil Cover Sheet and proposed *Ex Parte* Temporary Restraining Order Without Notice And Hearing were served on each of the defendants by placing the same in the U.S. mail for first class delivery, adequate postage pre-paid and addressed as follows:

STATE OF LOUISIANA
c/o Jeffrey Martin Landry,
Louisiana Attorney General
Post Office Box 94005
Baton Rouge, LA 70804

HONORABLE DENNIS WALDRON,
Ad Hoc Judge for 40th Judicial
District Court for St. John the
Baptist Parish, State of Louisiana
2393 Highway 18
Edgard LA 70049



BELINDA PARKER-BROWN

PLEASE SERVE:

- 1. STATE OF LOUISIANA**
c/o Jeffrey Martin Landry,
Louisiana Attorney General
1885 North Third Street
Baton Rouge, LA 70802
- 2. JUDGE DENNIS WALDRON,**
Ad Hoc Judge for 40TH Judicial
District Court for St. John the
Baptist Parish, State of Louisiana
2393 Highway 18
Edgard LA 70049

19TH JUDICIAL DISTRICT COURT
CIVIL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA

SUIT NO. C-721-385

DIVISION

BELINDA PARKER-BROWN, ZENA CRENSHAW LOGAL, AND ERROL VICTOR,
SR.

VERSUS

THE STATE OF LOUISIANA AND THE HONORABLE JUDGE DENNIS WALDRON,
PRESIDING IN HIS OFFICIAL CAPACITY OVER THE 40TH JUDICIAL DISTRICT
COURT FOR THE PARISH OF ST. JOHN THE BAPTIST IN THE STATE OF
LOUISIANA

DIVISION "B", CASE NO. 2010-CR-2010, STATE OF LOUISIANA V. ERROL VICTOR
SR.

FILED: _____

DEPUTY CLERK

**EX PARTE TEMPORARY RESTRAINING ORDER
WITHOUT NOTICE AND HEARING**

THIS MATTER HAVING BEEN BROUGHT BEFORE THE COURT in the above captioned case on the **FIRST AMENDED PETITION FOR INJUNCTION AND DECLARATORY RELIEF, VERIFIED WITH REQUEST FOR EX PARTE TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION** of Petitioners BELINDA PARKER-BROWN, ZENA CRENSHAW LOGAL AND ERROL VICTOR, SR., (hereinafter Victor) separately and *pro se*, and

THE COURT BEING DULY ADVISED AS TO THE PREMISES THEREOF does **HEREBY STATE:**

1. On or about September 22, 2009, the State of Louisiana charged Victor by grand jury indictment with second degree murder while engaged in the perpetration of the crime of cruelty to a juvenile, in violation of La. R.S. 14:30.1(A)(2)(b);
2. On August 1, 2014, Victor was purportedly convicted as charged by a non-unanimous jury verdict, ten (10) jurors voting to and two (2) jurors voting not to convict him (*hereinafter 10-2 verdict*). On September 15, 2014, Victor was accordingly sentenced to life

imprisonment at hard labor, without the benefit of parole, probation, or suspension of sentence;

3. Victor appealed the August 2014 conviction to the Louisiana Fifth Circuit Court of Appeal which affirmed his conviction on May 26, 2016. He petitioned the Louisiana Supreme Court which considered and denied his corresponding application for writ on October 15, 2018. On November 6, 2018, Victor filed for reconsideration of that denial which motion was denied on February 11, 2019;
4. On May 9, 2019, Victor filed a Petition for Writ of Certiorari with the United States Supreme Court challenging the referenced decision of the Louisiana Fifth Circuit Court of Appeal under 18 U.S.C. § 1257;
5. On April 27, 2020, the United States Supreme Court granted certiorari on Victor's petition, vacated the May 26, 2016 judgment of the Louisiana Fifth Circuit Court of Appeal, and remanded the case for further consideration in light of *Ramos v. Louisiana*, 590 U.S. ____ (2020);
6. On June 19, 2020, the Louisiana Fifth Circuit vacated Victor's August 1, 2014 sentence and conviction pursuant to the U.S. Supreme Court ruling in *Ramos*;
7. The *Ramos Court* emphasizes that "(a) 'verdict, taken from (less than twelve jurors is) no verdict' at all". *Ramos at 1395*;
8. "(T)he double jeopardy problem inheres in the very fact of a second trial for the 'same' offense." *Jeffers v. United States*, 432 U.S. 137 at 151 (1977);
9. As of this case, jury deliberations have concluded and a purported unanimous verdict of guilty on all charges against Victor has been interposed in *State of Louisiana v. Victor*, No. 2010-CR-2010 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana, Division "B";

FOR THE FOREGOING REASONS, without notice and hearing, the defendants and each of them are **HEREBY RESTRAINED** from in any way purporting to finalize and/or otherwise act in accord with the purported jury verdict interposed against Victor, including but not limited to entering the sentencing phase of and/or sentencing him pursuant to *State of Louisiana v. Victor*, No. 2010-CR-2010 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana, Division "B", at least until such time that this petition can be heard upon separate application for and notice of hearing on the Petitioners' request for preliminary junction.

THIS TEMPORARY RESTRAINING ORDER WITHOUT NOTICE AND HEARING endorsed with the date and hour of issuance, shall be filed in the clerk's office and entered of record, and shall expire by its terms exactly ten (10) day after said entry without the need for Petitioners or either of them to provide security.

DATE AND HOUR OF ISSUANCE:

HONORABLE JUDGE, 19TH JDC

PLEASE SERVE:

1. **BELINDA PARKER-BROWN**
1622 11th St.
Slidell, LA 70458
2. **ZENA D. CRENSHAW-LOGAL, J.D.**
3274 Mount Gilead Road, SW
Atlanta, GA 30311
3. **ERROL VICTOR, SR.**
c/o 1622 11th St.
Slidell, LA 70458
4. **STATE OF LOUISIANA**
c/o Jeffrey Martin Landry,
Louisiana Attorney General
1885 North Third Street
Baton Rouge, LA 70802
5. **JUDGE DENNIS WALDRON,**
Ad Hoc Judge for 40TH Judicial
District Court for St. John the
Baptist Parish, State of Louisiana
2393 Highway 18
Edgard LA 70049

do not serve petitioners
will pick up copy

Please serve only
defendants.

TX Result Report

P 1
07/21/2022 09:14
Serial No. AC75011000372
TC: 112283

Addressee	Start Time	Time	Prints	Result	Note
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Note TMR:Timer TX, PDL:Polling, ORG:Original Size Setting, FME:Frame Erase TX, DRS:Page Separation TX, MIX:Mixed Original TX, CALL:Manual TX, CSAC:CSAC, FWD:Forward, PE:PC-FAX, BND:Double-Sided Binding Direction, SP:Special Original, FCODE:IF-code, RTX:RE-TX, RLV:Relay, Max:Confidential, BUL:Bulletin, IPADR:IP Address Fax, I-FAX:Internet Fax IP-FAX: IP-FAX(SIP)

Result OK: Communication OK, S-OK: Stop Communication, PW-OFF: Power Switch OFF, TEL: RX from TEL, NG: Other Error, Cont: Continue, No Ans: No Answer, Refuse: Receipt Refused, Busy: Busy, H-Full:Memory Full, LOVR:Receiving length over, POUR:Receiving page over, Fil:File Error, DC:Decode Error, MDN:MDN Response Error, DSN:DSN Response Error, PRINT:Compulsory memory document Print, DEL:Compulsory Memory Document delete, SEND:Compulsory Memory Document Send.



Doug Welborn
Clerk of Court
19th Judicial District
Parish of East Baton Rouge

P.O. Box 1991
Baton Rouge, La 70821-1991
Telephone: (225) 389-3982
Fax: (225) 389-3392
www.ebrclerkofcourt.org

FAX RECEIPT

FROM: SUIT ACCOUNTING DEPARTMENT

FAX NUMBER: (225) 389-3392

To:

BELINDA PARKER-BROWN, ET AL VS THE STATE OF LOUISIANA, ET AL

Total Amount Due (Includes all applicable fees below) \$703.00

1005-PET-INJUNCTION-MANDAMUS-CIV
5011-EXHIBIT-CV

Date: JULY 20, 2022

Suit No.: C-721385

Section: 24

7 PAGES
16 PAGES

The Clerk's office received the above mentioned documents by facsimile transmission dated 7/20/22, document(s) in the above referenced case. In accordance with R.S. 13:850(B), within seven days, exclusive of legal holidays, the party filing the document shall forward to the clerk, the original signed document, applicable filing fees and a transmission fee. The fax transmission fee is also required of forma pauperis filings and filings by state/political subdivisions.

Applicable fees are established in accordance with law as follows:

- 13:850(B)(3) A transmission fee of five dollars
- 13:841(A)(2)(a) First page of each pleading, six dollars
- 13:841(A)(2)(b) Each subsequent page, four dollars
- 13:841(A)(2)(c) Paper-exhibits, attachments, transcripts and depositions-per page, two dollars
- 13:841(A)(4)(b) Issuing document without notice of service, fifteen dollars (Receipt generation fee)

NO FURTHER ACTION WILL BE TAKEN REGARDING THIS DOCUMENT UNTIL ALL FEES ARE RECEIVED IN THIS OFFICE.

SERVICE/SUBPOENA REQUESTS WILL NOT BE ISSUED FROM FAX FILING. SERVICE WILL BE ISSUED AS A RESULT OF THE FILING OF THE ORIGINAL DOCUMENT(S).

IF MAILING ORIGINAL DOCUMENT(S), PLEASE ATTACH THIS RECEIPT TO THE DOCUMENT(S) TO BE FILED. IF FILING THE ORIGINAL DOCUMENTS IN PERSON, PLEASE NOTIFY THE FILING CLERK OF THE PREVIOUS FAX FILING.

Ayanna Collins

Deputy Clerk of Court for
Doug Welborn, Clerk of Court

AMENDED
APPENDIX 9.6

LOUISIANA CIVIL CASE REPORTING

Civil Case Cover Sheet - LA. R.S. 13:4688, Part G, §13 of the Louisiana Supreme Court
General Administrative Rules, and Appendix 9.6 of the Louisiana District Court Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption: Parker-Brown, et al.

EAST BATON ROUGE PARISH C-721385
Filed Jul 25, 2022 2:46 PM 24
Deputy Clerk of Court
FAX Received Jul 20, 2022

vs. State of Louisiana, et al.

Court: 19TH JUDICIAL DISTRICT COURT

Docket Number: C-721-385

Parish of Filing: East Baton Rouge

Filing Date: July 20, 2022

Name of Lead Petitioner's Attorney:

Name of Self-Represented Litigant: Belinda Parker-Brown, Zena Crenshaw-Logal, and Errol Victor, Sr.

Number of named petitioners: 3

Number of named defendants: 2

Type of Lawsuit: Please check the categories which most appropriately apply to this suit
(no more than 3 categories should be checked):

- | | |
|---|--|
| <input type="checkbox"/> Auto: Personal Injury | <input type="checkbox"/> Auto: Property Damage |
| <input type="checkbox"/> Auto: Wrongful Death | <input type="checkbox"/> Auto: Uninsured Motorist |
| <input type="checkbox"/> Asbestos: Property Damage | <input type="checkbox"/> Asbestos: Personal Injury/Death |
| <input type="checkbox"/> Product Liability | <input type="checkbox"/> Premise Liability |
| <input type="checkbox"/> Intentional Bodily Injury | <input type="checkbox"/> Intentional Property Damage |
| <input type="checkbox"/> Intentional Wrongful Death | <input type="checkbox"/> Unfair Business Practice |
| <input type="checkbox"/> Business Tort | <input type="checkbox"/> Fraud |
| <input type="checkbox"/> Defamation | <input type="checkbox"/> Professional Negligence |
| <input type="checkbox"/> Environmental Tort | <input type="checkbox"/> Medical Malpractice |
| <input type="checkbox"/> Intellectual Property | <input type="checkbox"/> Toxic Tort |
| <input type="checkbox"/> Legal Malpractice | <input type="checkbox"/> Other Tort (describe below) |
| <input type="checkbox"/> Other Professional Malpractice | <input type="checkbox"/> Redhibition |
| <input type="checkbox"/> Maritime | <input type="checkbox"/> Class action (nature of case) |
| <input type="checkbox"/> Wrongful Death | |
| <input checked="" type="checkbox"/> General Negligence | |

Please briefly describe the nature of the litigation in one sentence of additional detail:

The first amended petition is for an injunction with declaratory relief, temporary restraining order, and preliminary injunction to enjoin ongoing violations of the Double Jeopardy Clause.

Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of person completing form:

Name Belinda Parker-Brown

Signature 

Address 1622 11th St. Slidell, LA 70458

Phone number: (985) 503-0626

E-mail address: strongunitedfront@yahoo.com

BELINDA PARKER-BROWN, ZENA : SUIT NO.: 721 SECTION: 385
 CRENSHAW LOGAL AND ERROL :
 VICTOR, SR. :
 :
 :
 versus : 19TH JUDICIAL DISTRICT
 COURT :
 :
 THE STATE OF LOUISIANA AND THE :
 HONORABLE JUDGE DENNIS WALDRON, :
 PRESIDING IN HIS OFFICIAL CAPACITY :
 OVER THE 40TH JUDICIAL DISTRICT : PARISH OF EAST BATON ROUGE
 COURT FOR THE PARISH OF ST. JOHN N:
 THE BAPTIST IN THE STATE OF LOUISIANA :
 DIVISION "B", CASE NO.: 2010-CR-2010 :
 STATE OF LOUISIANA V. ERROL VICTOR SR. : STATE OF LOUISIANA

**PETITION FOR INJUNCTION WITH REQUEST
 FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

NOW INTO COURT comes Petitioners **BELINDA PARKER-BROWN, ZENA CRENSHAW LOGAL AND ERROL VICTOR, SR.**, separately and *pro se*, and for their respective Cause of Action for Injunction pursuant to Louisiana Code of Civil Procedure, Article 3601 (La. C.C.P. Art. 3601) say as follows:

**I.
 The Petitioners**

1. Petitioner **Belinda Parker-Brown** (*hereinafter Parker-Brown*) is Co-Founder and CEO of Louisiana United International, Inc. (LUI)¹, a nonprofit corporation headquartered in Slidell, Louisiana and organized under the laws of the State of Louisiana. LUI functions as a membership-based civil, constitutional, and human rights advocate on a local, state-wide, national, and international basis. Both Parker-Brown and LUI are committed to combating private sector as well as public sector corruption in America, including but not limited to all forms of illegal bias, particularly against its members. Co-Petitioner Errol Victor, Sr. (*hereinafter Victor*) is a LUI member and has been so for several years preceding the petition at hand. Victor was, like several LUI members and many more of its constituents were prosecuted by the State of Louisiana and purportedly convicted for one or more serious crimes by a less than unanimous jury verdict;
2. Petitioner **Zena D. Crenshaw-Logal, J.D.** (*hereinafter Crenshaw-Logal*) has a Juris Doctorate degree, became licensed by the State of Indiana to practice law in October 1984, and in 1998 became a full-time human rights defender after gaining substantial experience as a plaintiff's complex civil trial attorney. On October 2, 2004, Crenshaw-Logal was suspended from the practice of law for a period of thirty (30) days for purportedly impugning a state as well as a federal judicial officer in approximately 1997 with regard to related legal matters. She has yet to seek reinstatement to the Indiana bar of attorneys. On October 10, 2018, the U.N. Human Rights Council (UNHRCouncil) confirmed that it is not manifestly ill-founded to contend Crenshaw-Logal's referenced discipline was in retaliation for her good government advocacy focused on appropriately expanding judicial accountability in America. She is LUI's Assistant Chief of

¹ Learn more at <https://www.launitedi.org>

Operations and leads the organization's collaboration with National Judicial Conduct and Disability Law Project, Inc. (NJCDLP)² which Crenshaw-Logal co-founded and has served as Executive Director since 2005. LUI closely collaborates with NJCDLP in addressing as a human rights matter America's undisputed lack of effective redress for organized, persistent U.S. legal system abuse facilitated by unchecked judicial misconduct. On July 8, 2022, Crenshaw-Logal joined Co-Petitioner Parker-Brown as a signatory to a complaint before the UNHRCouncil on behalf of "Reverend Errol Victor, Sr., (then) incarcerated at the Orleans Parish Jail @ New Orleans, Louisiana, United States of America (USA), and all currently as well as formerly incarcerated citizens of the USA he represents, them having been, like Victor, subjected to a vindictive criminal prosecution by one or more state and/or federal USA criminal prosecutors based on a constitutionally prohibited standard and effectuated by the improperly discriminating prosecutor(s) through illegal means including apparent collusion between one or more of the prosecutors and one or more state and/or federal USA judicial officers acting in their respective official capacity to deliberately deter or thwart proof as to one or more of the referenced victims' actual innocence in regard to the crime(s) underlying their respective, improper prosecution." A copy of the complaint is attached hereto and incorporated herein by reference as Petitioners' Exhibit A.

3. Petitioner **Errol Victor, Sr.** (Victor) is an African American and the defendant in *State of Louisiana v. Victor*, No. 2010-CR-2010 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana, Division "B", Judge Dennis Waldron presiding. Jury selection commenced in that matter on July 11, 2022 and trial of the case is underway as of this petition despite Victor's direct, on the record challenge of the court's jurisdiction to proceed.

II.

Procedural History

4. On or about September 22, 2009, the State of Louisiana charged Victor by grand jury indictment with second degree murder while engaged in the perpetration of the crime of cruelty to a juvenile, in violation of La. R.S. 14:30.1(A)(2)(b);
5. The charges ostensibly stem from the tragic death on April 1, 2008 of Victor's stepson, M.L. Lloyd III;
6. The 2009 case was allotted to Division "B" under case number 2010-CR-172 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana;
7. On August 1, 2014, Victor was purportedly convicted as charged by a non-unanimous jury verdict, ten (10) jurors voting to and two (2) jurors voting not to convict him (*hereinafter 10-2 verdict*). On September 15, 2014, Victor was accordingly sentenced to life imprisonment at hard labor, without the benefit of parole, probation, or suspension of sentence;
8. Victor appealed the August 2014 conviction to the Louisiana Fifth Circuit Court of Appeal which affirmed his conviction on May 26, 2016. He petitioned the Louisiana Supreme Court which considered and denied his corresponding application for writ on October 15, 2018. On November 6, 2018, Victor filed for reconsideration of that denial which motion was denied on February 11, 2019;

² Learn more at <https://www.njcdlp.org>

9. On May 9, 2019, Victor filed a Petition for Writ of Certiorari with the United States Supreme Court challenging the referenced decision of the Louisiana Fifth Circuit Court of Appeal under 18 U.S.C. § 1257;
10. On April 27, 2020, the United States Supreme Court granted certiorari on Victor's petition, vacated the May 26, 2016 judgment of the Louisiana Fifth Circuit Court of Appeal, and remanded the case for further consideration in light of *Ramos v. Louisiana*, 590 U.S. _____ (2020);
11. On June 19, 2020, the Louisiana Fifth Circuit vacated Victor's August 1, 2014 sentence and conviction pursuant to the U.S. Supreme Court ruling in *Ramos*;

III.

Each Petitioner's good faith arguments for extension, modification or reversal of certain existing law(s) and/or applications thereof in response to non-unanimous criminal convictions in light of *Ramos v. Louisiana*, 590 U.S. _____ (2020)

12. Ordinarily, "(a) mistrial may be ordered, and in a jury case the jury dismissed, when . . . (t)he jury is unable to agree upon a verdict". *La. C.Cr.P. Art. 775, §(2)*;
13. In 1982, the U.S. Supreme Court explained that such a development signals a "difference of opinion . . . among the jurors" and confirmed that "(a) deadlocked jury . . . does not result in an acquittal barring retrial under the Double Jeopardy Clause." *Tibbs v. Fla.*, 457 U.S. 31 at 42 (1982);
14. The *Tibbs Court* also noted that "the Double Jeopardy Clause does not require society to pay the high price of freeing every defendant whose first trial was tainted by prosecutorial error". *Id. at 44*;
15. Neither Petitioner proposes such a sweeping result. In fact, this petition countenances a carving of limited exceptions from exceptional circumstances;
16. The State of Louisiana has acknowledged that unlawful discrimination against African Americans based on race was a motivating factor in its adoption of non-unanimity rules for criminal convictions. *See, Ramos v. Louisiana*, 140 S. Ct. 1390 at 1394 (2020);
17. And Victor's ongoing prosecution is soundly cast as a prototype of vindictive criminal prosecutions in America, both fueled by racial animus and reliant on illegal tactics including but not limited to improper collusion between one or more unlawfully discriminating prosecutors with one or more presiding judges. *See, Petitioners' Exhibit A*;
18. "To permit a second trial after an acquittal, however mistaken the acquittal may have been, would present an unacceptably high risk that the Government, with its vastly superior resources, might wear down the defendant so that 'even though innocent he may be found guilty'." *United States v. Scott*, 437 U.S. 82 (1978);
19. A far too common penchant among U.S. criminal prosecutors to use those resources to deter if not totally thwart evidence of a criminal defendant's actual innocence for reasons far removed from any legitimate government objective aligns with abuses of power that Petitioners Parker-Brown and Crenshaw-Logal endeavor to combat on a professional, full-time basis;
20. When U.S. judges, justices, and/or quasi-judicial officers conspicuously and knowingly/deliberately facilitate the abuses, America lacks effective avenues of

redress. The U.N. Human Rights Council confirmed that reality on October 10, 2018 and U.S. government conceded that judicial oversight shortfall by implication via a draft report to the U.N. Human Rights Committee on January 15, 2021. As far as the Petitioners are aware, that report has not been withdrawn. Nonetheless, the Petitioners petition this Court to afford Victor the protection from Double Jeopardy being denied him and to which he is entitled, plus spare Petitioners Parker-Brown and Crenshaw-Logal the diminished viability as well as other injuries they will endure as non-lawyer human rights defenders, crisis managers, and social justice advocates should Victor be further denied that protection and a second trial of him conclude by jury verdict;

21. The *Ramos Court* emphasizes that "(a) 'verdict, taken from (less than twelve jurors is) no verdict' at all". *Ramos at 1395*;
22. However it appears, the underlying rationale is speculative and makes a mockery of jury *voir dire* as well as resulting jury selections and the administering of juror oaths;
23. It was "Louisiana's policy judgment that one or two jurors should not have the power to hijack the proceeding and block a conviction based on irrational, idiosyncratic, or irrelevant considerations." *Ramos v. Louisiana*, Brief of Respondent, No. 18-5924 before the U.S. Supreme Court, p 35;
24. According to the State of Louisiana, the U.S. Supreme Court "found 'no grounds for believing' that jurors in the majority would 'simply refuse to listen' to reasonable arguments in support of acquittal. *Id.* But the state concluded when a holdout juror "continues to insist upon acquittal without having persuasive reasons in support of [his] position,' then 'there is no basis for denigrating the vote of so large a majority of the jury or for refusing to accept their decision . . . as being beyond a reasonable doubt.' *Id.*" *Ramos v. Louisiana*, Brief of Respondent, p 34 citing *Johnson v. Louisiana*, 406 U.S. 356 (1972);
25. As far as the Petitioners are aware, there is no record and certainly no objective/scientific assessment(s) of specific "reasons" for Victor's 10-2 verdict in 2014;
26. Instead, what we have is the State of Louisiana's related arguments. The state has explained:

The holdout juror may be noble and a vessel for justice. But it is equally likely that he may be motivated by an irrational interpretation of the evidence, an improper bias for or against the prosecution or defendant, or a desire to nullify the charges notwithstanding compelling evidence of guilt. Maybe this juror is refusing to convict because the prosecutor seemed 'mean' or the defense attorney seemed 'nice.' Or perhaps he refuses to believe a key eyewitness from Smithtown because 'everyone knows that people from Smithtown are no-good liars.' Or maybe he distrusts science and thus disregards overwhelming ballistics or DNA evidence.

Ramos v. Louisiana, Brief of Respondent, p 35.

27. Given this **sheer speculation**, the Petitioners harken to Benjamin Franklin's admonition that "it is better 100 guilty Persons should escape than that one innocent Person should suffer";
28. In a country with no shortage of prisoners and a U.S. state often leading in that regard, it would be prudent to find reasonable doubt preempting a criminal

conviction based on one (1) duly selected, sworn, and instructed juror unwilling to convict. Presuming two (2) holdout jurors are merely unreasonable people defies logic and likely statistical probability; not to mention that at one point acting *pro se*, Victor commandeered three (3) holdout jurors in 2014;

29. What is **unreasonable** is any contention that Victor's 2014 nonunanimous conviction was ever inconsistent with reasonable doubt, was or is not tantamount to an acquittal, and/or signaled a mistrial within the meaning of Louisiana Code of Criminal Procedure, Article 775, section (2). *Cf. La. C.Cr.P. Art. 775, §(2)*;
30. That overturned conviction should operate as an acquittal given its undisputed foundation in institutionalized racism compounded by the compelling evidence set out by Petitioners' Exhibit A that it aligns with a consistent, national pattern of organized U.S. legal system abuse facilitated by unchecked judicial misconduct for which there is no effective, domestic avenues of redress. More specifically the conviction appears to be the product of a vindictive criminal prosecution based on a constitutionally prohibited standard, effectuated through illegal means including collusion between one or more prosecutors with private individuals including but not limited to lawyers acting as such and/or their respective client(s) as well as judicial officers acting in their respective official capacity to deliberately thwart proof of Victor's actual innocence;

III.

Petitioners' Irreparable Injury, Entitlement to Relief Sought, and Likelihood of Prevailing on the Merits of this Petition

31. The Petitioners and each of them adopt the foregoing averments and incorporate them herein by reference as if set out fully verbatim;
32. "(T)he double jeopardy problem inheres in the very fact of a second trial for the 'same' offense." *Jeffers v. United States*, 432 U.S. 137 at 151 (1977);
33. Victor is in the midst of contending with that problem, due in no small part to the prospect of prosecutor misconduct and other corruption that began to emerge on April 2, 2008 and **continues to date**, all attendant to M.L. Lloyd III's death;
34. "Nothing is ever settled until it is settled right." ~ Joseph Rudyard Kipling;
35. It is that simple truth robbing the relentless prosecutions which Petitioners hereby seek to enjoin their finality. Or rather, that truth given America's disregard of Article 2, paragraph 3(a) and (b) of its International Covenant on Civil and Political Rights (ICCPR) which mandate EFFECTIVE domestic avenues of redress for human rights violations under color of law;
36. According to the International Commission of Jurists, for a nation's avenues of redressing human rights violations to be effective, they "must be prompt, accessible, available before an independent body, and lead to reparation and, where applicable, to cessation of the wrongdoing". ICJ. (2012 December 11-12). The ICJ Declaration on Access to Justice and Right to a Remedy in International Human Rights Systems, p 3 ¶5, ICJ 17th World Congress, accessible as of July 19, 2022 @ <https://njcm.nl/wp-content/uploads/ntm/THE-ICJ-DECLARATION-ON-ACCESS-TO-JUSTICE-AND-RIGHT-TO-A-REMEDY-IN-INTERNATIONAL-HUMAN-RIGHTS-SYSTEMS.pdf>;
37. Obliging the Petitioners or any of them to seek protection of Victor's civil, constitutional, and/or human rights through currently/historically **ineffective** avenues of redress has imposed and continues imposing upon them irreparable

injury including but not limited to mental and emotional suffering, anxiety, inconvenience, diminished quality of life, plus otherwise unwarranted expense;

38. In fact, the harm imposed is fairly considered persecution in a global sense, tantamount at least for Victor to psychological torture;
39. The "lawful sanctions" exception to torture prohibitions "cannot include any sanctions or measures prohibited by relevant international instruments or national legislation." UN Human Rights Council, Report of the Special Rapporteur on torture and other cruel, inhuman, or degrading treatment or punishment, 14 February 2000, A/HRC/43/49, p 20, §IV. 84.(f);
40. As of this petition, trial is concluding and jury deliberations will soon begin in *State of Louisiana v. Victor*, No. 2010-CR-2010 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana, Division "B";
41. Petitioners and each of them are entitled to the relief hereby sought and they are likely to prevail on the merits of this case, especially should in the interim U.S. government come into compliance with relevant ICCPR provisions. Petitioner Parker-Brown's and Petitioner Crenshaw-Logal's efforts to help provoke that compliance are underway and promising;

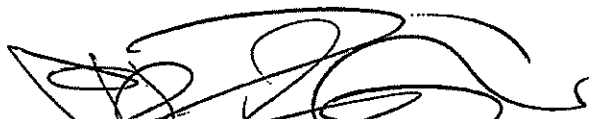
WHEREFORE, the Petitioners and each of them pray:

- a. that this petition proceed in accord with the Louisiana Code of Civil Procedure and all applicable law;
- b. for an interim order temporarily restraining the defendants and each of them from proceeding with trial of the *State of Louisiana v. Victor*, No. 2010-CR-2010 before the 40th Judicial District Court for the Parish of St. John the Baptist in the State of Louisiana, Division "B" until such time that this petition can be heard on the Petitioners' petition at hand for preliminary injunction;
- c. at the conclusion of said hearing they be granted a preliminary injunction enjoining the defendants from subjecting Victor to retrial based on any matter(s) for which he is fairly deemed acquitted in accord with the Petitioners' foregoing contentions or in any way violating their civil, constitutional, and/or human rights;
- d. upon discovery and trial they be granted a permanent injunction enjoining the defendants from subjecting Victor to retrial based on any matter(s) for which he is fairly deemed acquitted in accord with the Petitioners' foregoing contentions or in any way violating their civil, constitutional, and/or human rights; and
- e. for costs of this action plus any and all other relief just and proper upon the premises.

Respectfully Submitted,



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ZENA D. CRENSHAW-LOGAL, J.D.
3274 Mount Gilead Road, SW
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and



ERROL VICTOR, SR.
c/o PO BOX 2181
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PLEASE SERVE:

- 1. STATE OF LOUISIANA**
through the Louisiana
Attorney General's Office
- 2. JUDGE DENNIS WALDRON,**
Ad Hoc Judge for 40TH Judicial
District Court for St. John the
Baptist Parish, State of Louisiana

EAST BATON ROUGE PARISH Clerk of Court
300 NORTH BLVD
BATON ROUGE, LA 70801
Telephone: (225) 389-3982 Fax: (225) 389-3392

MBatiste

Deposit Receipt

Receipt Number: 694799
Receipt Date: 07/25/2022 02:54:42
Suit Number: C-721385

BELINDA PARKER-BROWN, ET AL
VS
THE STATE OF LOUISIANA, ET AL

Advance Deposit - Credit Card	\$1,150.00
Credit Card Fee (Non-Clerk Fee)	\$40.25
Total Charged to Credit Card	\$1,190.25
Auth: 1118785 / Ref: 22072514551233F3BE4422072514551	

Received From: PARKER-BROWN, BELINDA

Attorney Info: