

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

RECEIVED

2021 SEP 16 AM 11:11

G.S., by and through his parents and next
friends, BRITTANY AND RYAN
SCHWAIGERT, S. T. by and through her
mother and next friends, EMILY TREMEL,
and on behalf of those similarly situated,

Plaintiffs,

v.

GOVERNOR BILL LEE, in his official
capacity as GOVERNOR OF TENNESSEE,

Defendants

Peggy June Griffin, United States Taxpayer
and Citizen of the State of Tennessee and
Rhea County

Pro se Intervenor

No. 21-cv-02552-SHL-atc

MOTION TO INTERVENE
AND
COMPLAINT AND REQUEST TO DISCONTINUE SUIT

Comes above-referenced pro se litigant asking permission to Intervene and enter her strong resistance to the lawsuit brought against her through the vehicle called the ADA/Covid Extortion/Mandates and to request that this case be dismissed en toto.

Citizen pro se is well aware that in the recent years that pro se litigants are considered a sort of hillbilly and object of comical entertainment by 'trained lawyers,' yet this Citizen comes to this Court with a history of justice built on the foundations of the Righteousness of Christ and His Interest in Equity and Truth. Furthermore, the Courts have anciently recognized that citizens are forced to pay into a system which has become alien and has for its vernacular

language and practice which is foreign to their everyday existence, therefore the Courts, recognizing this handicap, made ancient provision for the profane to gain entrance and get the ear of the Court.

White v. CIR Civ.A. No. 80-K-397, US Distr. Court, D, Colorado, April 13, 1982:

“Under liberal construction of requirements of rule, complaint that gives defendant fair notice of what plaintiffs’ claim is, and grounds upon which it rests complies with rule, and under principle, that pro se plaintiffs are not to be held to the same standard as is imposed on trained lawyers, complaint complied with rule.”

The pro se litigant in this case furthermore enters into the record Exhibit I, an affidavit which gives background of a prominent graduate of the 1944 Class of the Chattanooga College of Law, her Mother, whose experience has founded the basis for her understanding in the undertow of corruption which has grieved the common citizen who expects justice and finds that his hopes are dashed without redress as a person. Said affidavit also provides an outline for the submitted data in this Motion.

It further demonstrates the high standards of law and justice formerly held by the State of Tennessee, whose Bible-based attorneys and judges, feared God and knew that Bible precept and precedent framed the foundation for a widow, by law, to demand that she got what was coming to her. She could not be disenfranchised from her rights as a wife. Knowing real American and Tennessee law gave her the knowledge to prevail, as opposed to the fraudulent and artificial quoting of some far-fetched and expensive precedent legal sentence.

The 1866 Civil Rights law as elucidated in the book by J. C. Wells, **MAGNA CHARTA or THE RISE AND PROGRESS OF CONSTITUTIONAL CIVIL LIBERTY**

IN ENGLAND AND AMERICA, embracing The Period from the Norman Conquest to the Centennial Year of American Independence, 1883, shown in Exhibit II, guaranteed absolute freedom unknown before. The American CIVIL RIGHTS LAW provides individual liberty and responsibility, as opposed to the negating of these Rights by the so-called CIVIL RIGHTS ACT of 1964. The overthrow of these freedoms, indeed the sedition entered into law by President Lyndon B. Johnson, after the death of President John Kennedy, is chronicled in a video you tube entitled THE KILLING OF KENNEDY, wherein President Johnson declared a virtual end to the personal freedoms furnished by the Civil Rights LAW of 1866.(A spurious copy is listed on the internet.)

Wise and prominent citizens like Senator Strom Thurmond entered strong protests and warned of the corruption which would emanate from this Act and its enforcement Arm.

Affirmative Action

“By its attempt to regulate and govern the private businesses, which are miscalled public accommodations in this bill, this proposal would inject the Government into the most sensitive areas of human contractual relations, agreements for personal services. In so doing, constitutional interpretations of long standing are being swept aside in favor of tortuous rationalizations which studiously ignore the constitutionally forbidden imposition of involuntary service on citizens.”

And the following classifies the hideous ‘grant/mandates’ as the worst in the history of the world.

“This bill, by vesting the power to withhold or terminate Federal funds, creates a concentration of power of economic coercion unequaled in the history of governments - a power concentration

which defies the experience of mankind with the temptation of power to corrupt.”

The Late S. C. Senator Strom Thurmond

The ‘power of corruption’ has come full circle until the entire population is held in abstract fear of a lawsuit or loss of federal funds from mandates. Such extortion is unAmerican; for the income tax to be withheld and forced to Washington to be distributed to various “ABC agencies” which recycle the money back to the districts with ‘mandates’ declares that men like Strom Thurmond were not so much politicians than prophets.

Furthermore, these insidious bureaucracies FORCED all 95 counties in Tennessee to adopt the insidious lawyers’ extortion and exaction involved with the ADA, now lecherously attached to the COVID redistribution scam. To add power to the condemnation of exaction, let the Word of God upon which our forefathers relied bring testimony.

Webster's 1828 Dictionary

Exaction

EXAC'TION, noun The act of demanding with authority, and compelling to pay or yield; authoritative demand; a levying or drawing from by force; a driving to compliance; as the exaction of tribute or of obedience.

1. Extortion; a wresting from one unjustly; the taking advantage of one's necessities, to compel him to pay illegal or exorbitant tribute, fees or rewards.

Take away your exactions from my people. **Ezekiel 45:9.** ...

2. That which is exacted; tribute, fees, rewards or contributions demanded or levied with severity or injustice. Kings may be enriched by exactions, but their power is weakened by the consequent disaffection of their subjects.

'Exactions' in the Bible

Isa 3:14

The Lord enters into judgment with the elders of His people and their princes,"For it is you who have devoured the vineyard [with your oppression, you have robbed the people and ruined the country];The plunder of the poor is in your houses.

Ezek 45:9

Thus saith the Lord GOD; Let it suffice you, O princes of Israel: remove violence and spoil, and execute judgment and justice, take away your exactions from my people, saith the Lord GOD.

Amos 5:11

Forasmuch therefore as ye trample upon the poor, and take exactions from him of wheat: ye have built houses of hewn stone, but ye shall not dwell in them; ye have planted pleasant vineyards, but ye shall not drink the wine thereof.

The above references to the Highest Authority in Law in America, the ground source for precept and principle, the Bible, condemns roundly with attendant curses from God such a system which was unheard of prior to the 1964 so-called Civil Rights Act.

Furthermore, Tennessee's heritage in resisting tyranny and unusual government force is reflected in the Mandate in the Tennessee Declaration of Rights, Art. 1, Section 2:

“That government being instituted for the common benefit, the doctrine of nonresistance against arbitrary power and oppression is absurd, slavish, and destructive of the good and happiness of mankind.”

Section 16. The declaration of rights hereto prefixed is declared to be a part of the Constitution of the state, and shall never be violated on any pretense whatever. And to guard against transgression of the high powers we have delegated, we declare that everything in the bill of rights contained, is excepted out of the general powers of the government and shall forever remain inviolate.”

Is it any wonder, then, that my Mother was shocked to find that her denial of her crown by the BAR Association; she knew real law and filled the ORDER that she resist ‘arbitrary power’ which she did successfully. Why hasn’t this Judge and the entire Bartlett, Tennessee, school board resisted the arbitrary power which is the ARM OF EXACTION with the tax dollars of the Tennessee taxpayers whose money is EXACTED? Why aren’t they angry with the EXACTION and EXTORTION practiced with their withholding income tax? Why would the Governor of Tennessee not know that he, after swearing a sacred oath on the Word of God, not tremble at the very thought of such extortion – that the Federal Government might withhold money from Tennessee which was rightfully ours in the first place????!!

Furthermore, in true Tennessee Volunteerism and Courage to contend for freedoms the Legislature in the last session passed laws forbidding the force by so-called ‘health’ departments. See Exhibit III – HJR 0013 and attendant signature by the Governor of Tennessee in conjunction with the expressed will of the people. I would remind this Court that it is unlawful to overturn the plain expressed will of WE THE PEOPLE who have voted through their Legislature that they WILL NOT BE FORCED – it is contrary to their natural God-given Rights and love of freedom. What kind of people would execute

such FORCE on a free people? Do their churches not teach them that “where the Spirit of God is, there is LIBERTY?” And that early preachers echoed the words of Circuit Preachers, ordering them to “stand fast in the liberty wherewith Christ hath made you so strange, free and not be entangled again in the yoke of bondage.” Did not Shelby County deliberately enjoin to honor the early courageous military hero of Kings’ Mountain by taking the name of Isaac Shelby? Do the children know of this famous fighting military hero who was ordered by Preacher Samuel Doak to “wield the sword of the LORD and of Gideon.” ???Do the teachers know? Does the Judge know and based on the oath to uphold the precept and principle reflected in the Word of God in Tennessee law and Declaration of Rights? Which law brought this Judge to power – the CIVIL RIGHTS LAW or the so-called CIVIL RIGHTS ACT?

Recent legal actions have included efforts to end the extortion/exaction exercised by the ACLU and other so-called “civil rights” attorneys. The powerful American Legion, the voice of millions of American veterans, moved Congress to end said extortion for legal fees. For example, in 2005, Resolution 326 was adopted in Congress, calling on Congress to withdraw the authority of judges to award attorney fees in all Establishment of Religion Clauses under all fee-shifting federal statutes, e.g., Equal Access to Justice Act, and not just 42 USC Section 1988, which was the lecherous vehicle for extortion and exaction to strip the United States Taxpayer of their money through the insidious recycling of federal money and attendant legal fees under the EAJA as well as 42 USC.1988. These combined resolutions have been reaffirmed in new iterations every two years with each new Congress. It is a policy of the American Legion that Resolutions calling on Congress to act need to be reaffirmed with the election of a new Congress. In the 2005 National American

Legion Convention where American Legion Attorney Rees Lloyd of California was to be a delegate, a new iteration of the original two resolutions were adopted to be applied to the 113th Congress which would be elected in November 2012.

“There simply is no reasonable basis to support the profiteering in attorneys’ fees ordered by judges...The very threat of such fees has made elected bodies, large and small, surrender to the ACLU’S (and like legal brotherhoods- Intervenor’s insert) demands to secularly cleanse the public square.” (*In the Footsteps of the Founders, A Guide to Defending American Values*, published by The American Legion, Public Relations Division,

Such actions by prestigious veteran’s organizations demonstrate the unrighteousness and injustice of the legal plunder whereby so-called ‘civil rights attorneys’ have robbed the individual of their freedom and skills in favor of the system of extortion and exaction, exercising the system of leechcraft practiced by 42 USC 1988. Complainant/Intervenor has been party in such intervention more than once, terrifying the legal system who fear the awakening by the Taxpayer. That day of awakening is at hand.

SUMMARY OF REDRESS AND RECOMMENDATIONS

Every person so effected by the insults to their qualifications subject to enforced employment should be outraged that they were denied their CIVIL RIGHTS LAW in favor of a hackneyed scheme to FORCE them into employment, rather than coming in the Right way of earned qualifications. Such effected persons will never be able to prove they gained their position through skill or personal qualifications for success, but will forever be indebted to a fraudulent and unnatural force, robbing their soul of the satisfaction of climbing up the Right Way. They are now indebted to a lecherous and unnatural force who will rob them of the glory of personal achievement and make them beholden to those who care nothing for their souls or happiness.

The artificial promotion through the so-called "Civil Rights Act" negates any authority the effected judges or employees might have to act or rule in any capacity, and must be removed at once from such authority.

The effrontery and overreach of the Federal judiciary and its attempt to usurp the authority of the Tennessee Constitution for any purpose is unacceptable and their rulings or opinions considered null and void, under the sovereign Rights of the citizens of the State of Tennessee.

The Internal Revenue Service must be restrained from using any force or coercion pertaining to federal income tax and no penalty required for refusal to be a party to said extortion/exaction. Sheriffs must exercise their rightful authority over their County governments and refuse admittance from any Federal agency who would exercise arbitrary power over our American Rights.

The particular overreach in restraining the Governor of Tennessee from a duly constituted Executive Order is particularly reprehensible in that the people of Tennessee voted through their legislature to avoid being FORCED by any entity, including the Shelby County School Board or any other tax-funded entity. Such high-minded conduct is not only unreasonable but is an affront to the liberty-loving people of Tennessee and will not be tolerated, to the extent of their ability to refuse to comply, Let this Complaint remind all who have dared to put their hand to stop the Governor's liberty exercise that they are paid by tax dollars, particularly in light of the recycling of their wealth through the mandate/grant system. Such high-minded conduct represents nothing more than slavery which subjects those who should be the true authorities to the philosophy that they are to "shut up and pay the bills." Who can suffer such insubordination?

Restraining the Internal Revenue Service will also represent a boon to the employees, judges, and massive staffers since they will be able to keep what they earn and spend it as

they well please, once they are free of the extortion/exaction of the grant/mandate system

Prosecution should begin at once with attendant prison terms for all who have been guilty of concocting and benefitting by said extortion/exaction.

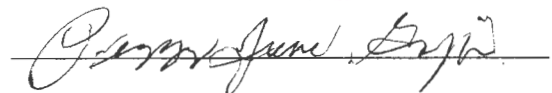
Any teacher who was party to ordering children of the free citizens out of school for refusal to wear masks must be forced to apologize and pay for any tuition or fees which were required for the effected parents being forced into an alternate school. Such conduct is reprehensible and unAmerican.

The overreach exercised by the Federal Judge requires a public apology with promise to bone up on the Tennessee Constitution, seeing such Judge has no jurisdiction over the State, especially in light of the FORCED use of tax dollars against the citizens of Tennessee who are denied redress into their mandated economy.

Intervenor recognizes her God-given Rights to protest aforesaid crookery and extortion/exaction, furthermore, she stands with the God of David before Goliath who said, in what may be called "Tennessee Hebrew," hillbilly vernacular, "you come to me with a Mandate and attached crooked grant/recycling, but I come to you in the Name of Jesus Christ the Righteous, Who is our Lawgiver, our Judge and our King, who saved our forefathers are Kings' Mountain and who put down the legal system with the testimony of my Mother, Peggy Cook Cobb, who came into her legal prowess the Right Way, the Civil Rights Law, without the extortion/exaction exercised by the so-called "Civil Rights Act."

By this great Name and Law, I ask recognition and redress and full benefits of the pro se litigant, United States and Tennessee citizen. I am an American.

Respectfully submitted,



PEGGY JUNE GRIFFIN, 265 Crestview Lane, Dayton, TN 37321 (423) 775-0774.

SWORN AFFIDAVIT

I, PEGGY JUNE GRIFFIN, solemnly swear that the following facts are true to the best of my knowledge and recollection.

- 1. That my Mother, Peggy Ann Cook Cobb, graduated from Chattanooga College of Law in Chattanooga, Tennessee, in 1944.**
- 2. That she came to her law degree under the CIVIL RIGHTS LAW, called the "Law of enfranchisement which was passed by Congress, in March, 1866:"* and also as an American citizen, residing and enjoying the privileges of both the Federal Bill of Rights and the Tennessee Declaration of Rights, to proceed in any Court of Law, both as a graduate of the Chattanooga College of Law and her citizenship.**
- 3. That she, a few years prior to her death on March 29, 1975, attempted to pass the Tennessee Bar Exam, by massive study of her library of law books which she had mastered as a student at the Chattanooga College of Law...**
- 4. That I, seeing her laboring under the burden of such extensive homework of preparation, told her to forget all that labor and just memorize supreme Court decisions of the last ten years and she would pass the Exam.**
- 5. That upon hearing this, she laughed at me and said, in so many words, that 'things were not that bad,' and she continued in her hard and studious labor.**
- 6. That she phoned me from Knoxville, having taken the Exam and failed, said to me, in so many words: "Guess what the text was on?"**
- 7. I replied to her, in so many words: "Supreme Court decisions of the last ten years?"**
- 8. She, with a broken heart, seeing the downfall of real law, and the sham, that law school had become, saw the degeneration of her health until she passed away with cancer in 1975.**
- 9. That she, on her death bed, instituted a precedent-setting suit against her husband, Newton A. Cobb, who had left her around \$5,000, of his massive insurance company's proceeds, virtually eliminating her Right to his Estate,**
- 10. That she, on her deathbed, filed suit, with the able defense of the prominent Chattanooga attorney, Robert Lawson, who also knew fundamental Tennessee law, that provided remedy for widows who were mandated to file against any action that excluded her from her rightful dowry,**
- 11. That this suit successfully sailed through the lower, middle and supreme Court and became precedent law on the Tennessee law books, Peggy Cook v.**

Newton Cobb, guaranteeing that widows were not left destitute and were more or less mandated to receive their just portion. This set the Justice of Tennessee Law as a hallmark of righteousness in law for widows.

12. That the 1964 so-called "Civil Rights" Act eclipsed good law, the Civil Rights Law, which was certified by the blood of Civil War Veterans on both sides of the Mason-Dixon line, which blood guaranteed that all individuals had total independent freedom to act as individuals, in ownership of property, jury rights, and all individual privileges not previously enjoyed, with attendant penalties against persons who attempted to interfere with these blood-bought Rights.

13. That my Mother exercised all the privileges guaranteed her in the Civil Rights LAW and came to great prominence, in spite of the artificial and fraudulent Civil Rights ACT of 1964, which robbed individuals of those independent and kingly privileges, dividing them into groups, Blacks, Women, and descending collectives requiring the mediation of a Lawyer, under a complicated system of supreme Court decisions, which were contrary to the simple, God-given Rights guaranteed by State and Federal Bills of Rights, especially the ability to represent themselves in Court.

14. That thousands of individuals came to prominence as manufacturers, university professors, and other professional occupations PRIOR to the spurious 1964 "Civil Rights Act,"

15. That this Act robbed the Individual of the ability to show skills or qualification and made a sham of personal achievement, having now unable to prove that they came to their occupations or prominence by a false way, and that they will never be able to enjoy the soul's privileges of personal achievement, placing a cloud over the titles of achievement or prominence, whether as either as Judges, elected offices, performers, ministers, or employees. Such individuals can never say: I achieved by my skill and ambition; rather such individuals are bounden slaves to a Usurper.

Personally appeared before me this the 14th DAY OF September, 2021, the signed individual with whom I am personally acquainted.

Peggy June Griffin
PEGGY JUNE GRIFFIN

Linda Shaver
NOTARY PUBLIC

My Commission Expires 9-1-22



CHAPTER LXVI.

THE CIVIL RIGHTS LAW.

Text of civil rights law—Constitutional amendments and other civil rights laws referred to.

THE following law of enfranchisement was passed by congress, in March, 1866:

SECTION 1. That all persons in the United States, and not subject to any foreign power, excluding Indians not taxed, are hereby declared to be citizens of the United States, and such citizens, of every race and color, without regard to any previous condition of slavery, or involuntary service, except as a punishment for crime, whereof the party shall have been duly convicted, shall have the same right, in every state and territory, to make and enforce contracts, to sue, to be sued, be parties and give evidence, to inherit, purchase, lease, sell, hold, and convey personal property; and to full and equal benefit of all laws and proceedings for the security of person and property, as are enjoyed by white citizens, and shall be subject to the like punishment, pains and penalties, and to none other; any law, statute, ordinance, regulation, or custom to the contrary notwithstanding.

SEC. 2. And that any person who, under color of any law, statute, ordinance, regulation, or custom, shall subject, or cause to be subjected, any inhabitant of any state or territory, to the deprivation of any right, secured or protected by this act, or to punishment, pains, or penalties, on account of such person having at any time been held in a condition of slavery, or involuntary servitude, except for the punishment of crime, whereof the party shall have been duly convicted, or by the reason of his color, or race, than is prescribed for the punishment of white persons, shall be deemed guilty of a misdemeanor, and, on conviction, shall be punished by a fine not exceeding one thousand dollars or imprisonment not exceeding one year, or both, in the discretion of the court.

SEC. 3. That the district courts of the United States, within their respective districts, shall have, exclusively of the courts of these several states, cognizance of all crimes and offenses committed against the provisions of this act, and also, concurrently with the circuit courts of the United States, of all causes, civil and criminal, affecting per-

THE CIVIL RIGHTS LAW.

499

Exh. II

sons who are denied, or cannot enforce in the courts of judicial tribunal of the state or locality where they may be, any of the rights secured to them by the first section of this act; and if any suit, or prosecution, civil or criminal, has been, or shall be, commenced in any state court, against such person, for any cause whatsoever, civil or military, or any other person for any arrest, or imprisonment, trespasses, or wrongs, done or committed, by virtue, or under color of any authority derived from this act, or the act establishing a bureau for the relief of freedmen and refugees, and all acts amendatory thereof, or for refusing to do any act upon the ground that it would be inconsistent with this act, such defendant shall have the right to remove such cause for trial to the proper district or circuit court, in the manner prescribed by the act relating to *habeas corpus* and regulating judicial proceedings in certain cases, approved March 3, 1863, and all acts amendatory thereto. The jurisdiction, in civil and criminal matters, hereby conferred on the district and circuit courts of the United States, shall be exercised and enforced, in conformity with the laws of the United States, so far as such laws are suitable to carry the same into effect; but, in all cases where such laws are not adapted to the object, or are deficient in the provisions necessary to furnish suitable remedies and punish offenses against the law, the common law, as modified and changed by the constitution and statutes of the state wherein the court having jurisdiction of the cause, civil or criminal, is held, so far as the same is not inconsistent with the constitution and laws of the United States, shall be extended, and govern the said courts in the trial and disposition of such causes; and, if of a criminal nature, in the infliction of punishment on the party found guilty.

SEC. 4. That the district attorneys, marshals, and deputy marshals, of the United States; the commissioners appointed by the circuit and territorial courts of the United States; with power of arresting, imprisoning, or bailing, offenders against the laws of the United States; the officers and agents of the Freedmen's Bureau; and every other officer who may be specially empowered by the president of the United States, shall be, and they are hereby specially authorized and required, at the expense of the United States, to institute proceedings against all, and every person, who shall violate the provisions of this act, and cause him, or them, to be arrested and imprisoned, or bailed, as the case may be, for trial before such of the United States, or territorial courts, as, by this act, have cognizance of the offense; and with a view to affording reasonable protection to all persons in their constitutional rights, of equality before the law, without distinction of race, or color, or previous condition of slavery, or involuntary servitude, except as a punishment for crime, whereof the party shall have been duly convicted, and for the prompt discharge of the duties of this act, it shall be the duty of the circuit courts of the United States, and the superior courts of the territories of the United States, from time to time, to increase the number of commissioners so as to afford a speedy and convenient means for the arrest and examination of persons charged with a violation of this act.

SEC. 5. That said commissioners shall have concurrent jurisdiction with the judges of the circuit and district courts of the United States, and the judges of the superior courts of the territories, severally and collectively, in term time and vacation, upon satisfactory proof being made, to issue warrants and precepts for arresting and bringing before them all offenders against the provisions of this act, and, on examination, to discharge, admit to bail or commit them for trial as the fact may warrant.

SEC. 6. And such commissioners are hereby authorized and required to exercise and discharge all the powers and duties conferred on them by this act, and the same duties with regard to offenses created by this act, as they are authorized by law to exercise with regard to other offenses against the laws of the United States. It shall be the duty of all marshals, and deputy marshals, to obey and execute all warrants and precepts issued under the provisions of this act, when to them directed; and should any marshal, or deputy marshal, refuse to receive such warrant, or other process, when tendered, or to use all proper means diligently to execute the same, he shall, on conviction thereof, be fined in the sum of one thousand dollars, to the use of the person upon whom the accused is alleged to have committed the offense; and the better to enable the said commissioners to execute their duties faithfully and efficiently, in conformity with the constitution of the United States and the requirements of this act, they are hereby authorized and empowered, within their counties, respectively, to appoint, in writing under their hands, one or more suitable persons, from time to time, to execute all such warrants and other process as may be issued by them in the lawful performance of their respective duties; and the person so appointed to execute any warrant or process, as aforesaid, shall have authority to summon, and call to their aid, the bystanders of a *posse comitatus* of the proper county, or such portion of the land or naval forces of the United States, or of the militia, as may be necessary to the performance of the duty with which they are charged, and to insure a faithful observance of the clause of the constitution which prohibits slavery, in conformity with the provisions of this act; and said warrants shall run, and be executed, by said officers, anywhere in the state or territory within which they are issued.

SEC. 7. That any person who shall, knowingly and wrongfully, obstruct, hinder or prevent any officer, or other person charged with the execution of any warrant or process issued under the provisions of this act, or any person, or persons, lawfully assisting him, or them, from arresting any person for whose apprehension such warrant or process may have been issued; or shall rescue, or attempt to rescue, such person from the custody of the officer, or other person, or persons, or those lawfully assisting, as aforesaid, when so arrested, pursuant to the authority herein given and declared; or shall aid, abet or assist any person so arrested, as aforesaid, directly or indirectly, to escape from the custody of the officer, or other persons legally authorized, as aforesaid; or shall harbor, or conceal, any person for whom a warrant

or process shall have been issued, as aforesaid, so as to prevent his discovery and arrest, after notice or knowledge of the fact that a warrant has been issued for the apprehension of such person, shall, for either of said offenses, be subject to a fine not exceeding one thousand dollars and imprisonment not exceeding six months, by indictment before the district court of the United States for the district in which said offense may have been committed, or before the proper court of criminal jurisdiction.

SEC. 8. That the district attorneys, the marshals, their deputies, shall be paid for their services, etc.

SEC. 9. That whenever the president of the United States shall have reason to believe that offenses have been, or are likely to be, committed against the provisions of this act, within any judicial district, it shall be lawful for him, in his discretion, to direct the judge, marshal, and district attorney of such district to attend at such place within the district, and for such time as he may designate, for the purpose of the more speedy arrest and trial of persons charged with the violation of this act; and it shall be the duty of every judge, or other officer, when any such requisition shall be received by him, to attend at the place, and for the time therein designated.

SEC. 10. That it shall be lawful for the president of the United States, or such persons as he may empower for that purpose, to employ such part of the land or naval forces of the United States, or of the militia, as shall be necessary to prevent the violation and enforce the due execution of this act.

SEC. 11. That, upon all questions of law arising in any cause under the provisions of this act, a final appeal may be taken to the supreme court of the United States.

This, together with the fourteenth and fifteenth amendments to the national constitution, and the jury act, and social act, fixed the African race among us in the status of citizens, endowed with all the rights, privileges, and immunities, natural and political, enjoyed by the people at large. And so the great work was consummated, which Castelar declares to be a transformation of beasts into men—that is, a political miracle.



Eph. III

State of Tennessee

PUBLIC CHAPTER NO. 513

HOUSE BILL NO. 13

By Representatives Hulsey, Griffey, Cepicky, Reedy, Weaver, Smith, Calfee, Hall, Rudd, Grills, Lafferty, Sherrell, Lynn, Zachary, Cochran, Bricken, Faison, Eldridge, Sparks, Tim Hicks, Warner, Hurt, Doggett, Todd, Moody, Keisling, Rudder, Alexander, Holsclaw

Substituted for: Senate Bill No. 187

By Senators Bowling, White, Bell, Pody, Stevens

AN ACT to amend Tennessee Code Annotated, Title 4; Title 5; Title 6; Title 7; Title 8; Title 49; Title 50 and Title 68, relative to health.

BE IT ENACTED BY THE GENERAL ASSEMBLY OF THE STATE OF TENNESSEE:

SECTION 1. Tennessee Code Annotated, Title 68, Chapter 5, Part 1, is amended by adding the following as a new section:

The governor shall not issue an executive order, a state agency or department shall not promulgate a rule, and a political subdivision of this state shall not promulgate, adopt, or enforce an ordinance or resolution, that requires a person to receive an immunization, vaccination, or injection for the SARS-CoV-2 virus or any variant of the SARS-CoV-2 virus.

SECTION 2. Tennessee Code Annotated, Section 49-6-5001(b)(2), is amended by deleting the language "In the absence of an epidemic or immediate threat of an epidemic, this section shall not apply" and substituting the language "Except as provided in subdivision (b)(3), in the absence of an epidemic or immediate threat of an epidemic, this section does not apply".

SECTION 3. Tennessee Code Annotated, Section 49-6-5001(b), is amended by adding the following as a new subdivision:

(3) This section does not apply to an immunization, vaccination, or injection for the SARS-CoV-2 virus or any variant of the SARS-CoV-2 virus.

SECTION 4. Tennessee Code Annotated, Section 68-2-603(f), is amended by deleting the language "In the absence of an epidemic or immediate threat of an epidemic, any person who shall file" and substituting the language "Except as provided in subsection (g), in the absence of an epidemic or immediate threat of an epidemic, any person who files".

SECTION 5. Tennessee Code Annotated, Section 68-2-603, is amended by adding the following as a new subsection:

(g) This section does not apply to an immunization, vaccination, or injection for the SARS-CoV-2 virus or any variant of the SARS-CoV-2 virus.

SECTION 6. Tennessee Code Annotated, Section 68-5-106, is amended by deleting subsection (a).

SECTION 7. Tennessee Code Annotated, Title 68, Chapter 5, Part 1, is amended by adding the following as a new section:

(a) A state agency or department shall not promulgate a rule, and a political subdivision of this state shall not promulgate, adopt, or enforce an ordinance or resolution, that requires medical treatment for those who object to the medical treatment on religious grounds or by right of conscience.

(b) As used in this section:

HB13

(1) "Medical treatment" means an immunization, vaccination, or injection for the SARS-CoV-2 virus or any variant of the SARS-CoV-2 virus; and

(2) "Political subdivision":

(A) Means a local governmental entity, including a city, town, municipality, metropolitan government, county, utility district, school district, public building authority, housing authority, emergency communications district, county board of health, and development district created and existing pursuant to the laws of this state, or an instrumentality of government created by one (1) or more local governmental entities; and

(B) Does not include a governmental entity that is subject to a federal or state statute or rule that prohibits the entity from requiring medical treatment for those who object to the medical treatment on religious grounds or right of conscience.

(c) This section does not apply to a student of a public institution of higher education created pursuant to title 49, who is subject to the policies or rules of a private office that delivers healthcare services or of a healthcare facility, as defined in § 68-11-201, that is not owned or controlled by the public institution of higher education, when the student is participating in a program of study or fulfilling educational requirements for a program of study in:

(1) Medicine;

(2) Dentistry;

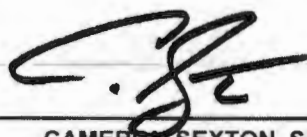
(3) Pharmacy; or

(4) Another healthcare profession.

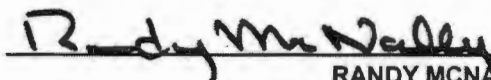
SECTION 8. This act takes effect upon becoming a law, the public welfare requiring it.

HOUSE BILL NO. 13

PASSED: May 4, 2021

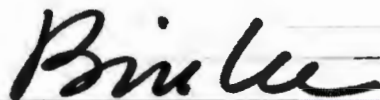


CAMERON SEXTON, SPEAKER
HOUSE OF REPRESENTATIVES



RANDY MCNALLY
SPEAKER OF THE SENATE

APPROVED this 25th day of May 2021



BILL LEE, GOVERNOR

Exhibit TV



**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION**

BUREAU OF ENGINEERING
SUITE 700, JAMES K. POLK BUILDING
505 DEADERICK STREET
NASHVILLE, TENNESSEE 37243-1402
(615) 741-0791

JOHN C. SCHROER
COMMISSIONER

BILL HASLAM
GOVERNOR

November 14, 2016

County Executive George Thacker
375 Church Street Suite 215
Dayton, TN 37321

RE: Americans with Disabilities Act (ADA) Compliance and Self-Certification

County Executive George Thacker:

Attached you will find a letter from the Federal Highway Administration Tennessee Division, in which the Tennessee Department of Transportation (TDOT) has been informed we must ensure every city and county with fifty (50) employees or more must have an ADA Transition Plan and Self-Evaluation in order to receive Transportation Funds.

This letter also serves as notice of the deadline for submission of compliance documentation. The deadlines for submission are as follows:

December 2016

- Communities with 50 employees or more in their jurisdiction must provide TDOT with documentation stating they have named a qualified person as their ADA Coordinator
- Communities must provide TDOT the Coordinator's contact information.
- Communities must develop and publish an ADA grievance procedure

December 2017

- Communities must provide a written letter from the Mayor outlining the development of their Transition Plan
- Letter from the Mayor must be adopted by the City Council or County Commissioners using the city's or county's own procedures

September 2018

- Communities must provide documentation showing they have completed or are making significant progress towards completing an ADA Transition Plan and Self Evaluation
- All self-certification forms are expected to be returned to TDOT.
Note: Projects may not be advanced within the city or county without this self-certification form

December 2019

- FHWA will require all Transition Plans be completed prior to communities resigning TIP certification

Submission of these deliverables will place TDOT and your community in compliance with the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973, Section 504.

Following submission, the ADA Transition Plan Form will be received by Deborah Fleming, TDOT's Senior Regional Planner and Margaret Mahler, TDOT's ADA Coordinator. Copies of this form must accompany all applications for funding.

For additional information concerning ADA requirements, please contact Ms. Margaret Zeman Mahler at Margaret.Z.Mahler@tn.gov.

Sincerely,



Paul D. Degges, P.E.
Deputy Commissioner/Chief Engineer

Rhea County, Tennessee Grievance Procedure under The Americans with Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by Rhea County, Tennessee. The County's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

Name: Jackie Reavley
Title: ADA Coordinator
Address: 375 Church St, Ste. 215
DAYTON, TN 37321
Phone # 423-775-7801

Within 15 calendar days after receipt of the complaint, Jacky Reavley or his/her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, Jacky Reavley or his/her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of Rhea County, Tennessee and offer options for substantive resolution of the complaint.

If the response by Jacky Reavley or his/her designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the County Executive or his/her designee.

Within 15 calendar days after receipt of the appeal, County Executive or his/her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the County Executive or his/her designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by Jacky Reavley or his/her designee, appeals to the County Executive or his/her designee, and responses from these two offices will be retained by Rhea County, Tennessee for at least three years.

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), Rhea County, Tennessee will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: Rhea County, Tennessee does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA.

Effective Communications: Rhea County, Tennessee will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Rhea County, Tennessee's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: Rhea County, Tennessee will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in Rhea County, Tennessee offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of Rhea County, Tennessee, should contact the office of the Rhea County Executive as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require Rhea County, Tennessee to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

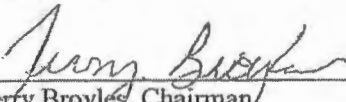
Complaints that a program, service, or activity of Rhea County, Tennessee is not accessible to persons with disabilities should be directed to Jacky Reavley.

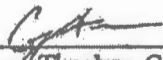
Rhea County, Tennessee will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

SECTION IV. In compliance with the Federal law described above and Tennessee laws pertaining thereto, the Legislative Body of Rhea County, Tennessee resolves to post the required information regarding the ADA Coordinator, Notice under the ADA, and the Rhea County, Tennessee's Grievance Procedure under the ADA on its website and at such other locations as may be determined from time to time.

PASSED AND ADOPTED by the Board of Commissioners of the County of Rhea, State of Tennessee, this 20th day of December, 2016.

APPROVED:


Terry Broyles, Chairman


George Thacker, County Executive

ATTEST


Linda Shaver, County Clerk

CERTIFICATION OF SERVICE

This is to certify that copies of the enclosed MOTION TO INTERVENE AND COMPLAINT AND REQUEST TO DISCONTINUE SUIT has been mailed to the following effected parties by U. S. Postal Service, on September 14, 2021.

Plaintiff:G.S., by and through his parents and next friends, Brittany and Ryan Schwaigert

BRYCE MOFFTT TIMMONS, (901)278-1004, Fax: 902-278-3111, email: bricedonatilaw.com

CRAIG A. EDGINGTON (901-278-1004) Fax: 901-278-3111; email: craig@donatilaw.com

ROBERT A. DONATI ((901) 278-1004 Fax: (901) 278-3111 email: robert@donatilaw.com

BRYCE WILLIAM ASHBY (901)278-1004 Fax: (901-278-3111; email: bryce@donatilaw.com.

The above combined and sent to Donati Law, PLLC, 1545 Union Avenue, Memphis, TN 38104 901-278-1004,

JESSICA FARRIS SALONUS

The Salonus Firm, Tennessee, 139 Stonebridge Blvd. 38305, Jackson, TN 38305
(731) 300-0970 Fax 731: 731-25-5711; email: jsalonus@salonusirm.com

Plaintiff: S.E. by and through her mother and next friend, Emily Tremel

(Represented by above attorneys)

Defendant, Gov. Bill Lee

Reoresented by **James R. Newson, III**, OFFICE OF THE ATTORNEY GENERAL AND REPORTER, 40 S. Main St., Suite 1014,Memphis, TN 38103, (901)543-2473, email: Jim.Newsom@ag.tn.gov, LEAD ATTORNEY

Matthew Reed Dowty, TENNESSEE ATTORNEY GENERAL'S OFFICE, One Commrce Square, 40 South Main Street, Memphis, TN 38103, 901-491-7290 cell; email: matthew.dowty@ag.tn.gov.

Defendant Shelby County, Tennessee

Represented by

TANNERA GEORGE GIBSON, burch porter & JOHNSON, 130 N. Court Avenue,
Memphis, TN 38103-22217, (901) 524-5000 Fax: 901-524-5024 Email:
tgibson@bpjlaw.com

CHARLES SILVESTRI HIGGINS, BURCH PORTER & johnson, 130 n. Court Avenue,
Memphis, TN 38103-2217 (703) 342-9448; email: **chiggins@bpjlaw.com**

EMMETT LEE WHITWELL, Shelby County Attorney's Office, 160 N. Main Street, Suite
950, Memphis, TN 38103 (901_ 222-2100; email: **lee.whitwell@shelbycountyttn.gov**

MARLINEE IVERSON, Shelby Count Attorney's Office, 160 N. Main, Ste 950, Memphis,
TN 38103, (901_ 222-2130; Fax: 901-222-2105 email:
Marlinee.Iverson@shelbycountyttn.gov

NATHAN A. BICKS, BURCH PORTER & JOHNSON, 130 N. Court Avenue, Memphis, TN
38103-2217, (901_ 524-5146 Fax (901_ 524-5024 Email: **Nbicks@bpjlaw.com**

SARAH ELIZABETH STUART BURCH, PORTER & JOHNSON, 130 North Court Avenue,
Memphis, TN 38103; (901_ 524-5107 Email: **sstuart@gpjlaw.com**

June Griffin
265 Crestview Ln.
Dayton, TN 37321-6022

		Retail
F	US POSTAGE PAID	
	\$5.55 Origin: 37321 09/14/21 4722800321-14	
FIRST-CLASS PKG SVC - RTL™		
0 Lb 8.80 Oz 1026		
C015		
SHIP TO: 167 N MAIN ST STE 242 Memphis TN 38103-1821		
USPS TRACKING® #		
		
9500 1151 9021 1257 3138 79		

(STILL)
IN GOD WE TRUST

RECEIVED

2021 SEP 16 11:10

*United States District Court
Western District of Tennessee
242 Federal Bldg. 167. N.
Memphis, Tennessee 38103*

Case 21-cv-02552-SHL-atc