



I.  
INTRODUCTION:

1. Plaintiffs will show that Defendants Abbot, Phelan, and White have embarked upon a course of conduct which is intended to violate State and Federal Constitutional Rights of the Plaintiffs and the classes of citizens they represent by denying rights under the First, Fifth, and Fourteenth Amendments to the U.S. Constitution because of
  - (a) Race, in that certain Plaintiffs are either black or white,
  - (b) Creed, in that certain Plaintiffs have expressed a faith or belief that every eligible citizen has the right to vote,
  - (c) Color, in that certain Plaintiffs are distinguishable based upon the melanin in their skin, and
  - (d) Natural origin, in that certain Plaintiffs are descendants of persons born in other countries.
  
2.
  - (a) Plaintiff, Senfronia Thompson is a resident of Harris County, Texas.
  - (b) Plaintiff, Trey Martinez Fischer is a resident of Bexar County, Texas.
  - (c) Plaintiff, Gene Wu is a resident of Harris County, Texas.
  - (d) Plaintiff, Vikki Goodwin is a resident of Travis County, Texas.
  - (e) Plaintiff, Ron Reynolds is a resident of Fort Bend County, Texas.
  - (f) Plaintiff, Eddie Rodriguez is a resident of Travis County, Texas.
  - (g) Plaintiff, Jon Rosenthal is a resident of Harris County, Texas.
  - (h) Plaintiff, Jasmine Crockett is a resident of Travis County, Texas.
  - (i) Plaintiff, Mary Ann Perez is a resident of Harris County, Texas.
  - (j) Plaintiff, Alma A. Allen is a resident of Harris County, Texas.
  - (k) Plaintiff, Christina Morales is a resident of Harris County, Texas.
  - (l) Plaintiff, Nicole Collier is a resident of Tarrant County, Texas.
  - (m) Plaintiff, Celia Israel is a resident of Travis County, Texas.
  - (n) Plaintiff, Ana-Maria Ramos is a resident of Tarrant County, Texas.

- (o) Plaintiff, Barbara Gervin-Hawkins is a resident of Bexar County, Texas.
  - (p) Plaintiff, Terry Meza is a resident of Dallas County, Texas.
  - (q) Plaintiff, Donna Howard is a resident of Travis County, Texas.
  - (r) Plaintiff, Jarvis Johnson is a resident of Harris County, Texas.
  - (s) Plaintiff, Ray Lopez is a resident of Bexar County, Texas.
  - (t) Plaintiff, Shawn Thierry is a resident of Harris County, Texas.
  - (u) Plaintiff, Elizabeth Campos is resident of Bexar County, Texas, and
  - (v) Plaintiff, Gina Hinojosa is a resident of Travis County, Texas.
3. Plaintiffs re victims of a discriminatory scheme to violate their Constitutional Right to Assemble to redress grievances; speak; vote; travel, persuade members of the Congress of the United States to help support them in their quest to obtain and maintain all of the rights guaranteed to them and their constituents and the class they represent. All because of their protected status.
4. This suit arises out of deliberate acts of status discrimination, as well as discriminatory policies, customs, and practices, perpetrated by Defendants against Plaintiffs and the putative class, that have disparately impacted all persons of each individual Plaintiff's status group. The claims in this suit also include damages resulting from actions taken against Plaintiffs because of their status.
5. Defendants collectively acted in concert with one another under color of law to cause the harm and damages alleged in this suit. Defendants' conduct violates the rights protected in 42U.S.C. §1981 and Plaintiffs' First Amendment right to petition government because Defendants' pervasive, systematic, and widespread acts custom and practices of status discrimination are continuing against putative class members. Plaintiffs include a request for class certification on behalf of others similarly situated. Some Plaintiffs also individually complain about retaliatory acts, threats, and attempts at coercion relating to the exercise of their First Amendment rights which are enforceable under 42U.S.C. §1983.

II.  
PARTIES

- 6.
- (a) Plaintiff, Senfronia Thompson is a resident of Harris County, Texas.
  - (b) Plaintiff, Trey Martinez Fischer is a resident of Bexar County, Texas.
  - (c) Plaintiff, Gene Wu is a resident of Harris County, Texas.
  - (d) Plaintiff, Vikki Goodwin is a resident of Travis County, Texas.

- (e) Plaintiff, Ron Reynolds is a resident of Fort Bend County, Texas.
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  - (s) Plaintiff, Ray Lopez is a resident of Bexar County, Texas.
  - (t) Plaintiff, Shawn Thierry is a resident of Harris County, Texas.
  - (u) Plaintiff, Elizabeth Campos is a resident of Bexar County, Texas.
  - (v) Plaintiff, Gina Hinojosa is a resident of Travis County, Texas.
7. Defendant, Gregory Wayne Abbott is a public servant and the duly-elected Governor of the State of Texas, a resident of Texas who lives in Travis County, Texas. Service of process is required.
8. Defendant, Dade Phelan is a public servant and duly-elected Member of the Texas House of Representatives who was elected Speaker of The House and is a resident of Texas who lives in Jefferson County, Texas. Service of process is required.
9. Defendant, James White is a public servant and duly-elected Member of the Texas House of Representative, a resident of Texas who lives in Tyler County, Texas. Service of process is required.

III.

JURISDICTION AND VENUE

10. This action arises under Title 42 of the U.S. Code, Sections 1343, 1983, 1985 and 1988 and this Court has jurisdiction of the action under Title 28 of the U.S. Code, Sections 1331, 1332 and 1343.
11. At all times pertinent to this complaint, the Defendant Gregory Wayne Abbott, was the Governor of The State of Texas, the Defendant Dade Phelan was a Member of the Texas House of Representative, and Speaker of The House of Representatives, and Defendant James White was a Member of the Texas House of Representative, and in doing the acts and things hereinafter set forth, said Defendants were acting in their respective capacities as stated, under color of State Law.
12. Plaintiffs, and the classes they represent are white, black, Asian, Hispanic, gay, and all subscribe to the creed and belief that all citizens who are otherwise eligible should be allowed to register and vote in all elections.
13. Defendants, individually and collectively, have embarked upon a course of action, scheme, conspiracy, and course of conduct, by public statements and otherwise to attempt to deny, coerce, threaten, intimidate and prevent Plaintiffs and the members of the classes Plaintiffs:
  - (1) the right to vote in all elections,
  - (2) the right to peacefully assemble to redress their grievances,
  - (3) the right to speak publicly about the exercise of their constitutional rights,
  - (4) the right of association,
  - (5) the right to security of person, and
  - (6) the right to freedom from arrest, except upon probable cause, supported by oath or affirmation.
14. Plaintiffs allege that in doing the acts and things complained of, the Defendants were conspirator engaged in a scheme and conspiracy designed and intended to deny and deprive them of rights guaranteed to them under the Constitution and laws of the United States and particularly those herein above enumerated.
15. Plaintiffs allege that, as a direct consequence and result of the acts of Defendants herein above complained of, Plaintiffs have been deprived of liberty for substantial periods of time, suffered much anxiety and distress over the separation from their families, and much discomfort and embarrassment and their reputations impaired, and have lost much time from their homes and the companionship and care of their families and have been required to spend substantial sums of money and of time traveling to and from the State of Texas to persuade Congress to pass laws to ameliorate the harm done and redress their grievances.

Wherefore, Plaintiffs claim damages of the Defendants in the amount of Five Dollars (\$5.00) in actual damages to themselves and the classes they represent and Ten Dollars (\$10.00) in punitive damages to themselves and the classes they represent.

16. Plaintiffs allege that because of the foregoing, it was necessary to obtain, seek, and employ legal counsel to seek redress under the Civil Rights Attorney Fees Act.

**PRAYER FOR RELIEF**

Wherefore, Plaintiffs pray that this Honorable Court

1. Advance this cause on the Docket,
2. Grant a temporary restraining order
3. Order a Hearing on their request for a Temporary Injunction
4. Grant Temporary Injunction after hearing evidence on the Motion.
5. Enjoin the Defendants from doing any act which does or violates Plaintiffs' Constitutional Rights.
6. Grant Plaintiffs reasonable attorney fees,
7. Grant Plaintiffs actual and punitive damages, and
8. Such other and further relief additional, alternative, and equitable relief as may appear to the Court to which they may be entitled and just.

RESPECTFULLY SUBMITTED,



THE CRAIG ANTHONY WASHINGTON LAW FIRM  
ATTORNEY FOR PLAINTIFFS

SBOT# 20901000

P.O. BOX 306

BASTROP, TEXAS

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OF COUNSEL;

DEGUREN & DICKSON

1018 PRESTON AVENUE

SEVENTH FLOOR

HOUSTON, TEXAS 77002

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(713) 223-9231 Facsimile

caw@deguerin.com

JS 44 (Rev. 06/17)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p><b>I. (a) PLAINTIFFS</b></p> <p style="text-align: center;">Senfronia Thompson et al</p> <p><b>(b) County of Residence of First Listed Plaintiff</b> _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p><b>(c) Attorneys (Firm Name, Address, and Telephone Number)</b></p>	<p><b>DEFENDANTS</b></p> <p style="text-align: center;">Abbott et al</p> <p>County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known)</p> <p style="font-size: 2em; text-align: center;"><b>1:21 CV0690 RP</b></p>
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<p><b>II. BASIS OF JURISDICTION</b> <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table style="width:100%; border-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

**IV. NATURE OF SUIT** *(Place an "X" in One Box Only)* Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p><b>PERSONAL PROPERTY</b></p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <p style="text-align: center;"><b>PROPERTY RIGHTS</b></p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <p style="text-align: center;"><b>SOCIAL SECURITY</b></p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutional of State Statutes
<p><b>REAL PROPERTY</b></p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p><b>CIVIL RIGHTS</b></p> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p><b>PRISONER PETITIONS</b></p> <p><b>Habeas Corpus:</b></p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p><b>Other:</b></p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<p style="text-align: center;"><b>FEDERAL TAX SUITS</b></p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
		<p style="text-align: center;"><b>LABOR</b></p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act			
		<p style="text-align: center;"><b>IMMIGRATION</b></p> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions			

**V. ORIGIN** *(Place an "X" in One Box Only)*

1 Original Proceeding  
  2 Removed from State Court  
  3 Remanded from Appellate Court  
  4 Reinstated or Reopened  
  5 Transferred from Another District *(specify)*  
  6 Multidistrict Litigation - Transfer  
  8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*  
 42:1983 Civil Rights Act

Brief description of cause:

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.      DEMAND \$ \_\_\_\_\_

CHECK YES only if demanded in complaint:  
 JURY DEMAND:  Yes    No

**VIII. RELATED CASE(S) IF ANY** *(See instructions):*

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE \_\_\_\_\_ SIGNATURE OF ATTORNEY OF RECORD \_\_\_\_\_

**FOR OFFICE USE ONLY**

RECEIPT # 100040238      AMOUNT \$402.00      APPLYING IFP \_\_\_\_\_      JUDGE Pitman      MAG. JUDGE \_\_\_\_\_



DUPLICATE

Court Name: TEXAS WESTERN  
Division: 1  
Receipt Number: 100040238  
Cashier ID: cjames  
Transaction Date: 08/06/2021  
Payer Name: CRAIG A. WASHINGTON

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CIVIL FILING FEE- NON-PRISONER  
For: CRAIG A. WASHINGTON  
Amount: \$402.00

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PAPER CHECK  
Check/Money Order Num: 260  
Amt Tendered: \$402.00

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Total Due: \$402.00  
Total Tendered: \$402.00  
Change Amt: \$0.00

1:21-CV-690-RP; THOMPSON ET AL V.  
ABBOTT ET AL; CIVIL FILING FEE