

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

ELAINE BLANCHARD, KEEDRAN FRANKLIN,
PAUL GARNER and BRADLEY WATKINS,

Plaintiffs,

v.

Civil Action No.

CITY OF MEMPHIS,

COMPLAINT FOR ENFORCEMENT
OF ORDER, JUDGMENT AND DECREE, DAMAGES AND OTHER RELIEF

COME NOW the Plaintiffs, Elaine Blanchard, Keedran Franklin, Paul Garner and Bradley Watkins, by and through undersigned counsel, and petition this Court for enforcement of the provisions of the Order, Judgment and Decree heretofore entered by this Court in *Kendrick, et. al. v. Chandler*, Civil Action No. C76-449, and order the Defendant to appear and show what cause exists, if any, to excuse the Defendant's willful and wanton disregard of the terms and provisions of the Order, Judgment and Decree and why the Defendant should not be adjudicated guilty of contempt of court and punished according to law, for failing or refusing to obey a lawful order of this Court, and for an award of damages to the Plaintiffs as compensation and sanctions for the conduct of the Defendant, with fees and costs and attorneys' fees taxed to the Defendant and for such other, and further relief as this Court finds appropriate. In support of their Complaint, the Plaintiffs state as follows:

JURISDICTION AND VENUE

1. This is an action brought to enforce the provisions of the Order, Judgment and Decree concerning First Amendment rights previously entered by this Court in *Kendrick, et. al. v. Chandler*, Civil Action No. C76-449, in the United States District Court for the Western District of Tennessee on September 14, 1978, and continuing in perpetuity. This Court asserted and retained jurisdiction of the subject matter in that earlier case and judgment orders; and the jurisdictional basis of this action is an extension of such earlier jurisdictional findings and orders.
2. Venue is proper in this United States District Court for the Western District of Tennessee in that all of the unlawful acts, practices and conduct of the Defendants occurred within Memphis, Shelby County, Tennessee. Further, the permanent and binding injunctions in that earlier case were entered in this United States District Court for the Western District of Tennessee and it is proper for the Plaintiffs to seek enforcement of the orders of this Court here.

PARTIES

3. Plaintiff, Elaine Blanchard, is a resident of the Memphis, Shelby County, Tennessee and the United States of America. She is a native-born citizen of the United States of America who has never renounced or waived her citizenship. The Plaintiff is a person who is entitled to protection provided by the Order, Judgment and Decree.
4. Plaintiff, Keedran Franklin, is a resident of the Memphis, Shelby County, Tennessee and the United States of America. He is a native-born citizen of the United States of America who has never renounced or waived his citizenship. The Plaintiff is a person who is entitled to protection provided by the Order, Judgment and Decree.

5. Plaintiff, Paul Garner, is a resident of the Memphis, Shelby County, Tennessee and the United States of America. He is a native-born citizen of the United States of America who has never renounced or waived his citizenship. The Plaintiff is a person who is entitled to protection provided by the Order, Judgment and Decree.
6. Plaintiff, Bradley Watkins, is a resident of the Memphis, Shelby County, Tennessee and the United States of America. He is a native-born citizen of the United States of America who has never renounced or waived his citizenship. The Plaintiff is a person who is entitled to protection provided by the Order, Judgment and Decree.
7. Defendant, City of Memphis, is a municipality duly incorporated under the laws of the State of Tennessee, and as such, is a political subdivision of the State of Tennessee, and among its other functions, maintains and operates a law enforcement agency known as the Memphis Police Department. The city is under a duty to operate its police activities in a lawful manner so as to preserve the peace of the city and the rights, privileges and immunities guaranteed and secured to its residents and visitors by the constitution and the laws of the United States and/or the State of Tennessee. The city is subject to suit pursuant to 42 U.S.C. § 1983. The city may be served with this Complaint by serving the City Attorney, Bruce McMullen, at his office located at 125 North Main Street, Suite 336, Memphis, TN 38103.

STATEMENT OF THE CASE

8. The Plaintiffs are citizens of the United States and residents of Memphis Tennessee. They bring this Complaint and Petition to Show Cause to vindicate their constitutional and statutory rights under the Constitution of the United States and the State of Tennessee and of the laws of both jurisdictions. Plaintiffs are intended beneficiaries of a

Consent Decree preventing the City of Memphis and the Memphis Police Department from conducting surveillance of peaceful protests protected by the First Amendment to the United States Constitution and of the Tennessee Constitution, the Tennessee Human Rights Act 4 T.C.A. Sections 21-101 et. seq. and the Civil Rights Act of 1964, specifically Section 42 U.S.C. § 1983.

FACTUAL STATEMENT

9. On September 14, 1978, this Court entered a Consent Order, Judgment and Decree preventing domestic surveillance of lawful and peaceful protests and exercise of First Amendment rights.
10. The Order, Judgment and Decree has been in full force and effect since its entry and the defendants have at all times had full knowledge of its terms. The Defendant City and the Memphis Police Department, as a condition of the Order, Judgment and Decree, were charged with the responsibility of disseminating the contents of the Order to the members of the Memphis Police Department.
11. The City of Memphis and the Memphis Police Department had notice of and were subject to the Order, Judgment and Decree, and have willfully and wantonly violated its core provisions prohibiting the City of Memphis from engaging in law enforcement activities which interfere with any person's rights protected by the First Amendment to the United States Constitution, including, but not limited to, the right to speak and dissent freely and to associate privately and publicly for any lawful purpose.
12. The Memphis Police Department has engaged in willful and wanton conduct violating the consent order by video recording participants at lawful protests, including specifically on February 21, 2017, in front of City Hall and by establishing a list which

prevents and/or chills the Plaintiffs and others from exercising their rights to seek redress of grievances and protest. Such conduct is a violation of the Order, Judgment and Decree. A copy of the Consent Order is attached as Exhibit 1 and incorporated herein as if set forth verbatim.

13. Under section J. Dissemination and Posting of this Decree., of the Order, Judgment and Decree, the “Defendants and the City of Memphis shall familiarize each of its law enforcement personnel with the contents of this Decree in the same manner in which those personnel are instructed about other rules of conduct governing such personnel. In addition, defendants and the City of Memphis shall disseminate and make known the contents of this Decree through publication, public posting and other means.” In spite of the clear language of the Order, the City of Memphis and the Memphis Police Department, have failed to publish the Order on the websites of the City of Memphis or the Memphis Police Department. This omission is a clear and intentional violation of this Court’s Order.
14. In 2014, the Memphis Police Department bought and used a program called Geofeedia. The software shows users a map of their area overlaid with pins showing who is posting what, to what social media platform they are posting, and what they are posting about. According to Memphis Police Department spokesperson Louis Brownlee, the Memphis Police Department used the program for “checking social media for public safety.”
15. On October 13, 2016, a letter was sent to Bruce McMullen, the City Attorney, requesting a formal response and explanation from the city as to how the program was being used by the City of Memphis and the Memphis Police Department, before a Motion to Show Cause was filed.

16. On October 27, J. Michael Fletcher, Deputy City Attorney, responded by way of a letter stating that he would look into the issues raised in the above referenced and attached letter and would more fully respond to the inquiry. To date, neither Mr. Fletcher, nor anyone else with the City of Memphis has provided a substantive response to the letter of inquiry.
17. The City of Memphis and the Memphis Police Department have created “black lists” consisting of eighty-one citizens who cannot come to City Hall without a police escort to wherever they are going in the building. See Exhibit 2, attached hereto.

COUNT I – Violation of Order, Judgment and Decree

18. Plaintiffs hereby incorporate by reference all preceding paragraphs and all factual allegations contained therein.
19. The investigation of the Plaintiffs and their inclusion on the “black list” compiled and maintained by the City of Memphis and the Memphis Police Department violate the Order, Judgment and Decree entered by this Court.
20. The use of the Geofeedia software program by the City of Memphis and the Memphis Police Department violates the Order, Judgment and Decree entered by this Court.
21. The failure of the City of Memphis and/or the Memphis Police Department to publish the Order, Judgment and Decree on the website of the Memphis Police Department is a clear and intentional violation of this Court’s Order.
22. The surveillance and video recording of the Plaintiffs by the City of Memphis and/or the Memphis Police Department is a clear and intentional violation of this Court’s Order and is intended to chill the First Amendment rights of the Plaintiffs and is a clear and intentional violation of this Court’s Order.

23. The actions of the City of Memphis and/or the Memphis Police Department in connection with their investigation, stigmatization, recording and isolation of the Plaintiffs were undertaken solely and exclusively for the purpose of silencing, harassing and intimidating the Plaintiffs' First Amendment conduct, and is a clear and intentional violation of this Court's Order.

CONCLUSION

Unless this Court imposes significant, painful and meaningful penalties for the willful and wanton defiance of this Court's Order, Judgment and Decree, its Order will continue to be disregarded and the constitutional rights of the Plaintiffs and others will continue to be denied and violated.

WHEREFORE, the Plaintiffs respectfully request this Court for relief as follows:

- A. For issuance of an order that the City of Memphis show what cause exists, if any, to excuse the willful and wanton disregard of the terms and provisions of the Order, Judgment and Decree and violation of the constitutional rights with respect to the Plaintiffs;
- B. For an award of monetary damages, both compensatory and punitive, to the Plaintiffs and as sanctions for the conduct of the City of Memphis;
- C. For an Order directing the City of Memphis to dissolve the "black list" immediately and without delay and to prohibit the City of Memphis from creating or maintaining such lists in the future;
- D. For the entry of an Order herein awarding fees and costs and attorneys' fees taxed to the City of Memphis;

- E. For the entry of an Order, after a hearing, finding the Defendant to be in contempt of this Court for the willful and wanton disregard of the restrictions, requirements and prohibitions imposed by the Order, Judgment and Decree;
- F. For such other and further relief as this Court in equity finds to be appropriate.

Respectfully submitted,

s/Bruce S. Kramer
APPERSON CRUMP, PLC
Bruce S. Kramer (#7472)
Scott A. Kramer (# 19462)
6070 Poplar Avenue, 6th Floor
Memphis, Tennessee 38119
(901) 756-6300
Attorneys for Plaintiffs

EXHIBIT

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

CHAN KENDRICK, ET AL.,	\$	
Plaintiffs,	\$	
VS.	\$	CIVIL ACTION
	\$	NO. C 76-449
WYETH CHANDLER, et al.,	\$	
Defendants,	\$	

ORDER, JUDGMENT AND DECREE

Plaintiffs, Chan Kendrick, Mike Honey, and the American Civil Liberties Union in West Tennessee, Inc., having commenced this action on or about September 14, 1976, against defendants Wyeth Chandler, Mayor of the City of Memphis, W. O. Grunby, Chief of Police and Acting Director of Police of the City of Memphis, R. T. Ryan, Captain of the Intelligence Section of the Memphis Police Department, and George W. Hutchinson, Deputy Chief of Operations of the Memphis Police Department, individually and in their official capacities, and the court having determined by Order dated September 23, 1977 that the pleadings are sufficient to state a cognizable claim for relief, and the parties having waived hearing, findings of fact and conclusions of law, and defendants having consented to entry without further notice of the within Order, Judgment and Decree (hereinafter "Decree"):

NOW, THEREFORE on application of Jack D. Novik, Esquire, American Civil Liberties Union Foundation, Bruce S. Kramer, Esquire, American Civil Liberties Union in West Tennessee, Inc., and Alex Hurdor, attorneys for the plaintiffs, and upon consent of defendants, it is ORDERED, ADJUDGED and DECREED as follows:

A. Statement of General Principles

The defendants heretofore deny that they have acted illegally in any manner but agreed to the term hereafter set out in order to dispose of the controversy between the parties.

The provisions of this Decree prohibit the defendants and the City of Memphis from engaging in law enforcement activities which interfere with any person's rights protected by the First Amendment to the United States Constitution including, but not limited to, the rights to communicate an idea or belief, to speak and dissent freely, to write and to publish, and to associate privately and publicly for any lawful purpose.

Furthermore, even in connection with the investigation of criminal conduct, the defendants and the City of Memphis must appropriately limit all law enforcement activities so as not to infringe on any person's First Amendment rights.

B. Definitions

1. "First Amendment rights" means rights protected by the First Amendment to the Constitution of the United States including, but not limited to, the rights to communicate an idea or belief, to speak and dissent freely, to write and to publish, and to associate privately and publicly for any lawful purpose.

2. The "City of Memphis" means all present and future officials, employees and any other agents, and all departments, divisions and any other agencies, of the City of Memphis, Tennessee.

3. "Person" means any individual, group or organization.

4. "Political Intelligence" means the gathering, indexing, filing, maintenance, storage or dissemination of information, or any other investigative activity, relating to any person's beliefs, opinions, associations or other exercise of First Amendment rights.

5. "Defendants" means defendants Chandler, Grumby, Ryan and Hutchinson and their successors in office.

C. Political Intelligence

1. The defendants and the City of Memphis shall not engage in political intelligence.
2. The defendants and the City of Memphis shall not operate or maintain any office, division, bureau or any other unit for the purpose of engaging in political intelligence.

D. Prohibition Against Electronic Surveillance for Political Intelligence

The defendants and the City of Memphis shall not intercept, record, transcribe or otherwise interfere with any communication by means of electronic surveillance for the purpose of political intelligence.

E. Prohibition Against Covert Surveillance for Political Intelligence

The defendants and the City of Memphis shall not recruit, solicit, place, maintain or employ an informant for political intelligence, nor shall any officer, employee or agent of the City of Memphis, for the purpose of political intelligence, infiltrate or pose as a member of any group or organization exercising First Amendment rights.

F. Harassment and Intimidation Prohibited

1. The defendants and the City of Memphis shall not disrupt, discredit, interfere with or otherwise harass any person exercising First Amendment rights. Among other things, the City of Memphis shall not disseminate damaging, derogatory, false or anonymous information about any person for the purpose of political intelligence, or attempt to provoke disagreement, dissension or violence between persons.
2. The defendants and the City of Memphis shall not engage in any action for the purpose of, or reasonably having the effect of, deterring any person from exercising First

Amendment rights. As an example, the City of Memphis shall not, at any lawful meeting or demonstration, for the purpose of chilling the exercise of First Amendment rights or for the purpose of maintaining a record, record the name of or photograph any person in attendance, or record the automobile license plate numbers of any person in attendance.

C. Criminal Investigations Which May Interfere With the Exercise of First Amendment Rights

1. Any police officer conducting or supervising a lawful investigation of criminal conduct which investigation may result in the collection of information about the exercise of First Amendment rights, or interfere in any way with the exercise of such First Amendment rights, must immediately bring such investigation to the attention of the Memphis Director of Police for review and authorization.

2. The Director of Police shall review the factual basis for the investigation and the investigative techniques to be employed. The Director of Police shall issue a written authorization for an investigation for a period not to exceed ninety (90) days only if the Director of Police makes written findings that:

- a. The investigation does not violate the provisions of this Decree; and
- b. the expected collection of information about or interference with, First Amendment rights is unavoidably necessary for the proper conduct of the investigation; and
- c. Every reasonable precaution has been employed to minimize the collection of information about, or interference with, First Amendment rights; and

d. the investigation employ the least intrusive technique necessary to obtain the information.

3. The Director of Police may authorize an extension of such investigation for an additional period specified by the Director of Police not to exceed ninety (90) days. The Director of Police shall authorize each such extension only if the Director of Police re-evaluates the factual basis for the investigation and the investigative techniques to be employed, and makes current written findings as required in Paragraph 2, above.

II. Maintenance and Dissemination of Information

1. The defendants and the City of Memphis shall not maintain personal information about any person unless it is collected in the course of a lawful investigation of criminal conduct and is relevant to such investigation. Information which has been collected in violation of this Decree shall be destroyed.

2. The defendants and the City of Memphis shall not disseminate personal information about any person collected in the course of a lawful investigation of criminal conduct to any other person, except that such information may be disseminated to another governmental law enforcement agency then engaged in a lawful investigation of criminal conduct.

I. Restriction on Joint Operations

The defendants and the City of Memphis shall not encourage, cooperate with, delegate, employ or contract with, or act at the behest of, any local, state, federal or private agency, or any person, to plan or conduct any investigation, activity or conduct prohibited by this Decree.

J. Dissemination and Posting of this Decree

The defendants and the City of Memphis shall familiarize each of its law enforcement personnel with the contents of

this Decree in the same manner in which those personnel are instructed about other rules of conduct governing such personnel. In addition, Defendants and the City of Memphis shall disseminate and make known the contents of this Decree through publication, public posting and other means.

K. Effective Date

This Decree shall be effective when approved and entered by the Court as fair, reasonable and adequate.

L. Binding Effect

This Decree, providing prospective relief only, constitutes a full and final adjudication of all the named plaintiffs' claims for injunctive and affirmative relief as stated in the Complaint. However, it shall have no binding effect upon any claims for damages that have been, might have been, or might in the future, be asserted by any other individual. Any statutes of limitations that apply to any such claims are hereby tolled from September 11, 1978 to the date of this Decree.


M. Retention of Jurisdiction

The Court will retain jurisdiction of this action, including any issue which might arise regarding payment of attorneys' fees to counsel for plaintiffs, pending disposition of all matters contained in this Decree and for the purpose of issuing any additional order required to effectuate this Decree.


SO ORDERED.



UNITED STATES DISTRICT COURT

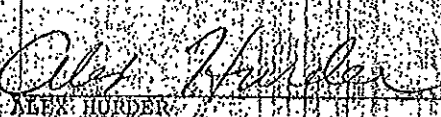
APPROVED FOR ENTRY:


Arthur G. Breen
Deputy City Attorney
City Hall, Room 314
125 N. Main Street
Memphis, Tennessee 38103

Attorney for Defendants


Joseph P. Novik
American Civil Liberties Union
Foundation
22 East 40th Street
New York, New York 10016
212/725-1222


Bruce S. Kramer
American Civil Liberties Union
in West Tennessee, Inc.
P. O. Box 3070
Memphis, Tennessee 38103
901/525-6361


Alex Horper
Attorney at Law
311 North Maple Street
Covington, Tennessee 38019
Attorneys for Plaintiffs



MEMPHIS POLICE DEPARTMENT

LISTING OF PERSONS BARRED FROM PREMISES

Also have to be escorted while in city hall
Jl. Walter Bunn # 0043

I, Jim Strickland being the (owner, person in charge) of the premises located at (address) 267 Kedgefield doing business as (name of business) _____ in Memphis, Shelby County, Tennessee, do hereby state that the following individuals have by personal communication from me or someone with authority to act for me been ordered to stay off the described property:

NAME	AGE	RACE	HEIGHT	WEIGHT
<u>ANTWUAN J. WILLIAMS</u>	DOB: [REDACTED]	M/B	6'0"	260 LBS
<u>JASMINE Y. GARNER</u>	DOB: [REDACTED]	F/B	5'4"	185 LBS
<u>STANLEY G. LOMAX</u>	DOB: [REDACTED]	M/B	6'1"	225 LBS
<u>FELICIA SCARPATI-LOMAX</u>	DOB: [REDACTED]	F/B	5'4"	165 LBS
<u>DEANN J. GREEN</u>	DOB: [REDACTED]	F/B	5'5"	228 LBS
<u>CEDRIC D. HORTON</u>	DOB: [REDACTED]	M/B	5'11"	230 LBS
<u>LORRIE M. GARCIA</u>	DOB: [REDACTED]	F/W	5'1"	117 LBS
<u>DEION D. PHILLIPS</u>	DOB: [REDACTED]	M/B	5'6"	135 LBS
<u>TREYON E. TONEY</u>	DOB: [REDACTED]	M/B	6'5"	310 LBS
<u>JANELLE E. MACKLIN</u>	DOB: [REDACTED]	F/B	5'9"	210 LBS
<u>THERYN C. BOND</u>	DOB: [REDACTED]	F/B	5'4"	120 LBS
<u>ADAM F. WHITE</u>	DOB: [REDACTED]	M/W	5'7"	150 LBS
<u>JASON F. SHARIF</u>	DOB: [REDACTED]	M/B	5'9"	215 LBS

See Addendum for additional names.

Witnessed By: Albert Bunn #0043

Signature: [Signature]
(Property Owner/agent)

Title: Lieutenant

Title: Owner

Date/Time: 1-4-17 4:49pm

Date/Time: 1-4-17 4:49pm

AA 0306





MEMPHIS POLICE DEPARTMENT

LISTING OF PERSONS BARRED FROM PREMISES

Also have to be
escorted while in
city hall
H. Alton Bonner

I, Jim Strickland being the (owner, person in charge) of the premises located at (address) 267 Ridgely doing business as (name of business) _____ in Memphis, Shelby County, Tennessee, do hereby state that the following individuals have by personal communication from me or someone with authority to act for me been ordered to stay off the described property:

NAME	AGE	RACE	HEIGHT	WEIGHT
<u>DEMALE MCVAY</u>	DOB: [REDACTED]	M/B	5'11"	350 LBS
<u>ALLYSON TRULY</u>	DOB: [REDACTED]	F/B	5'7"	200 LBS
<u>TERRY STEWART</u>	DOB: [REDACTED]	F/B	5'7"	150 LBS
<u>MARY STEWART</u>	DOB: [REDACTED]	F/B	5'6"	170 LBS
<u>ADAM GUERRERO</u>	DOB: [REDACTED]	M/W	6'3"	250 LBS
<u>DEVANTE HILL</u>	DOB: [REDACTED]	M/B	6'3"	190 LBS
<u>BRADLEY WATKINS</u>	DOB: [REDACTED]	M/B	5'9"	200 LBS
<u>SPENCER KAAZ</u>	DOB: [REDACTED]	M/W	5'8"	160 LBS
<u>JYANNI WEBSTER</u>	DOB: [REDACTED]	M/F	5'6"	150
<u>KEEDRAN FRANKLIN</u>	DOB: [REDACTED]	M/B	6'0"	175 LBS
<u>FERGUS NOLAN</u>	DOB: [REDACTED]	M/W	5'6"	200 LBS
<u>PAUL GARNER</u>	DOB: [REDACTED]	M/W	5'9"	170 LBS
<u>IAN JEFFERIES</u>	DOB: [REDACTED]	B/M	6'2"	240 LBS

See Addendum for additional names.

Witnessed By: Albert Bonner

Title: Lieutenant

Date/Time: 1-4-17 4:53p.m.

Signature: [Signature]
(Property Owner/agent)

Title: Owner

Date/Time: 1/4/17 4:53pm



MEMPHIS POLICE DEPARTMENT

LISTING OF PERSONS BARRED FROM PREMISES

All Listed
have to be
escorted while
inside of city
hall.

J. Albert Barner #0043

I, Jim Strickland being the (owner, person in charge) of the premises located at (address)
267 Ridgefield doing business as (name of business) _____
in Memphis, Shelby County, Tennessee, do hereby state that the following individuals have by
personal communication from me or someone with authority to act for me been ordered to stay off
the described property:

NAME	AGE	RACE	HEIGHT	WEIGHT
<u>FRANK GIBSON</u>	DOB: [REDACTED]		M/B 5' 8"	200 LBS
<u>DETRIC D. GOLDEN</u>	DOB: [REDACTED]		M/B 5' 10"	200 LBS
<u>MAUREEN SPAIN</u>	DOB: [REDACTED]		F/W 5' 4"	120 LBS
<u>AARON L. LEWIS JR.</u>	DOB: [REDACTED]		M/B 6' 2"	260 LBS

See Addendum for additional names.

Witnessed By: Albert Barner #0043

Signature: [Signature]

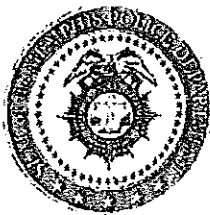
(Property Owner/agent)

Title: Lieutenant

Title: Owner

Date/Time: 1/4/17 4:48 p.m.

Date/Time: 1/4/17 4:48 p.m.



MEMPHIS POLICE DEPARTMENT
LISTING OF PERSONS BARRED FROM PREMISES

I, Jim Starkland being the (owner, person in charge) of the premises located at (address) 267 Ridgefield doing business as (name of business) _____ in Memphis, Shelby County, Tennessee, do hereby state that the following individuals have by personal communication from me or someone with authority to act for me been ordered to stay off the described property:

<u>NAME</u>	<u>AGE</u>	<u>RACE</u>	<u>HEIGHT</u>	<u>WEIGHT</u>
<u>TAMAN ARAFAT QURAN</u>	<u>DOB: [REDACTED]</u>		<u>F/O 5'6"</u>	<u>130 LBS</u>
<u>ORAZZAN HAZEM QURAN</u>	<u>DOB: [REDACTED]</u>		<u>F/O 5' 4"</u>	<u>120 LBS</u>
<u>MONICA BROWN</u>	<u>DOB: [REDACTED]</u>		<u>F/W 5' 3"</u>	<u>120 LBS</u>
<u>WILLIAM JOHNSON</u>	<u>DOB: [REDACTED]</u>		<u>M/B 6' 2"</u>	<u>190 LBS</u>
<u>DANA ASBURY</u>	<u>DOB: [REDACTED]</u>		<u>F/B 5' 7"</u>	<u>140 LBS</u>
<u>CHRISTIAN KIRK</u>	<u>DOB: [REDACTED]</u>		<u>F/B 5' 11"</u>	<u>185 LBS</u>
<u>STANLEY POLSON</u>	<u>DOB: [REDACTED]</u>		<u>W/M 6' 4"</u>	<u>250 LBS</u>
<u>DARCIE POLSON</u>	<u>DOB: [REDACTED]</u>		<u>F/V 5' 4"</u>	<u>125 LBS</u>
<u>GREGORY THOMPSON</u>	<u>DOB: [REDACTED]</u>		<u>M/B</u>	
<u>ELAINE BLANCHARD</u>	<u>DOB: [REDACTED]</u>		<u>F/W 5' 4"</u>	<u>135 LBS</u>
<u>ANTONIO CATHEY</u>	<u>DOB: [REDACTED]</u>		<u>6' 4"</u>	<u>290 LBS</u>
<u>ALEXIS ISBELL</u>	<u>DOB: [REDACTED]</u>		<u>6' 1"</u>	<u>350 LBS</u>
<u>EARL FISHER</u>	<u>DOB: [REDACTED]</u>			

See Addendum for additional names.

Witnessed By: Albert Bonner #0043

Signature: [Signature]

(Property Owner/agent)

Title: Lieutenant

Title: Owner

Date/Time: 1-4-17 4:51pm.

Date/Time: 1/4/17 4:51pm



MEMPHIS POLICE DEPARTMENT

THE FOLLOWING PEOPLE HAVE TO BE ESCORTED AT ALL TIMES
WHILE INSIDE OF CITY HALL

I Lt. A. Bonner being the (person in charge) of the premises located at (125 North Main), doing business as the Memphis Police Dept.

in Memphis, Shelby County, Tennessee, do hereby state that the following individuals have by personal communication from me or someone with authority to act for me been ordered to stay off the described property:

NAME

1. Amber Duvall F/W

[REDACTED]

[REDACTED]

2. Rachel Gay F/W

[REDACTED]

[REDACTED]

3. Seema Rasoul F/W

[REDACTED]

[REDACTED]

4. Robert Smith M/W

[REDACTED]

[REDACTED]

5. Paul Garner M/W

[REDACTED]

[REDACTED]

6. Erick Conner M/W

[REDACTED]

[REDACTED]

7. Jessica Reznicek F/W

[REDACTED]

[REDACTED]

8. Clay Ayers M/W

[REDACTED]

[REDACTED]

9. Ruby Montoya F/W

[REDACTED]

[REDACTED]

10. Spencer Kaaz M/W

[REDACTED]

[REDACTED]

11. Katherine Hanson F/W

[REDACTED]

[REDACTED]

12. Olivia Ramirez F/W

13. Hunter Dempster M/W

14. Pamela Modkey F/B

Witnessed By

Alfred Brown #0043

Signature:

W. J. Modkey
(Property Owner/agent)

Title:

Lieutenant

Title:

Officer

Date/Time:

1/17/17 4:50pm

Date/Time:

1/17/17 4:55pm

W. J. Modkey

Officer

1/17/17 4:50

Alfred Brown #0043

Lieutenant

1/17/17 4:50pm

Subject: City Hall Escort list

Bernard Gillard-vandalism

Reginald Brown-harassment and intimidation

Theotis Brown-harassment and intimidation

Richard Smith-criminal trespass

Equinta Washington-former employee

Anthony Hayes-former employee

Sherman Raines-disorderly conduct

Hattie L. King-former employee

Tamara G. Webb-former employee

Charlie Darnell Nelson-intimidation and harassment

Kent Young-former employee

George Weaver-harassment

Isareal Britt-Taylor-former employee

Deborah Sturdivant-former employee

Willie Moore-threats

Eric J. Bland-former employee

Demetrius Parson-former employee

Joseph Lumpkin-former employee

Diane Townsend-Disorderly conduct

William Paul Gillespie-Order of Protection

Gabriel Vaughn-former employee

Kanekia Wilson-former employee

Allison Devante-threats

Vivian Umfress-former employee

Elwood Shepard-former employee

Alamdulliah Wa-Salatus-threats

Eric Mills-former employee