

who, each month were to issue Exemption Certifications to the U.S. Internal Revenue Service on behalf of Seneca Nation of Indians Inc. identifying this Corporation as a Legal Sovereignty. A duty that could only be issued to a controlling Corporate Member.

Plaintiff's, MOTION FOR DISCOVERY with an "in camera" proceedings that will challenge the creditability of others alleged to be Controlling Corporate Members.

IV. FACTS

4. Plaintiff and his family(family is made up with a wife and four small daughters-Dawn, Anjoli, Renee, and Dominique)were living in Espanola, New Mexico. This residence was up too, June 8,1986.

5. Contact was first made by telephone between the Seneca Nation Housing Authority and Plaintiff's wife PATRICIA QUINN around the beginning of May 1986.

6. On May 20,1986-Plaintiff and his wife signed and mailed to the Seneca Nation Housing Authority, an application to participate in the Low-Income Housing Program, which they received on May 27,1986(SEE exhibit A)

7. On or about June 17,1986 this Housing Authority approved this application and assigned a four Bedroom House #5 to Plaintiff's wife and family for residence on June 18,1986(SEE exhibit B).

8. On or about July 2,1986 Plaintiff was served by Security Officers of the Seneca Nation of Indians Inc. which the Defendant CALVIN E. LAY controls, an Exclusion Order dated September 21,1973(SEE exhibit C). Plaintiff told Security Officers to tell Defendant CALVIN LAY, to exclude Plaintiff after accepting him into Low-Income Housing Programs on an issue heard before this court on case no. Civ-75-70, could get all funding cut out. These Security Officers reply was:" What the Nation needed!."

9. On or about July 11,1986 Security Officers hand-delivered a letter from the defendant CALVIN E. LAY which states that he wants to enforce the Exclusion Order.(SEE exhibit D).

10. To date, Plaintiff, his wife, and small daughters suffer the harassment by Security sent by Defendant CALVIN E. LAY due to this Exclusion Order. Security watches Plaintiff and family 24 hours a day and a Security vehicle can be seen parked two houses down from where Plaintiff lives each night.

V. LEGAL CLAIMS

11. The facts related above disclose a concerted and systematic effort by the defendants and their agents, to first entice Plaintiff and his family back to New York to participate in Low-Income Housing Programs. This enticement not only caused Plaintiff to lose a House that was being rented, but lose his place in Rio Arriba and Santa Fe Counties Low-Income Housing Program waiting lists.

12. Second, to serve an Exclusion Order after being accepted into Low-Income Housing, was a legal move by defendants to leave Plaintiff, his wife and four small daughters in a destitute situation without financial resources.

These facts related, deprive Plaintiff of all secured rights under the jurisdiction of all funding programs, and the 5th., 8th., and 14th. Amendments of the Constitution, which are Due Process, Cruel and Unusual Punishment, and Equal Protection of the Law.

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