

See page 6

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ENCLOSED FOR THE BUREAU ARE TWO PHOTOSTATIC COPIES OF A PETITION FOR TEMPORARY RESTRAINING ORDER AND TWO PHOTOSTATIC COPIES OF A COMPLAINT. BOTH DOCUMENTS FILED IN USDC, MDT, NASHVILLE, TENNESSEE, ON 12/27/73, BY JAMES E. RAY. NO OTHER ACTION BEING TAKEN AT THIS TIME, HOWEVER, CONTACT WILL BE MAINTAINED WITH USA, NASHVILLE, AND FURTHER DEVELOPMENTS WILL BE PROPERLY SUBMITTED TO THE BUREAU. Pp:

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION.

FILED

DEC 27 1973

JAMES E. RAY, #65477
Plaintiff/ petitioner

BRADLEY J. JAMES, Clerk
s. *Bradley J. James*

vs.
GOV. WINFIELD DUNN, Governor,
State of Tenn.

Civil action no 7338

MARIE H. LUTTWELL, Commissioner
of corrections, State of Tenn.

Defendants

PETITION FOR TEMPORARY RESTRAINING ORDER

Petitioner, acting pro se, alleges:

1. That on or about, December 21st 1973, petitioner was informed by deputy warden, Robert Herford, an employe of the Tenn. State Prison, Nashville, division, that said prison officials were negotiating with Federal authorities to transfer petitioner—who is an inmate of said prison—to a United States government penitentiary.
2. That petitioner is under no penitentiary sentence pursuant to a conviction in United States courts, nor does the Federal government hold detainers against petitioner.
3. That said reported transfer is a logrolling operation devised by the Tenn. Attorney General's office, and the State administration, to obstruct petitioner's legal processes under the charge petitioner is incarcerated under and, political considerations for 1976; and not, as Gov. Dunn implied Dec. 21st during a TV news conference, "that Tennessee are incapable of running their own institutions".
4. That petitioner intends to contest said reported transfer through the

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870970 ORIGINAL RETURN

5. That an article in the, Tennessean, dated Dec. 22nd 1973, suggest's that their is a move afoot by Federal & State bureaucrats to surreptitiously attempt a removal of petitioner from his present jurisdiction, without reguer to due process of Law, to a Federal mental institution in, Springfield, Missouri.

6. That the State of, Missouri, not the Federal Government, has alleged exceeding jurisdiction over petitioner.

7. That petitioner received a back injury approximately thirty (30) days ago which prevents him from standing or sitting in excess of ten (10) minutes at a time, the nature of which would preclude his being transfered a substantial distance without the possibility of irreparable physical harm being done.

8. That petitioner has received inadequate treatment for said back injury and a transfer to Federal jurisdiction would obscure the negligence, if any, between Federal & State authorities.

WHEREFORE, petitioner prays the honorable court issue orders restraining the defendants from transferring petitioner beyon the instant court's jurisdiction, until a hearing can be held, as said reported tranzfer would result in immediate & irreparable legal & physical damage to petitioner; that the court also overlook technical error herein- until petitioner can retain counsel which he is in the process of doing- since petitioner is denied use of the prison Law library.

Respectfully submitted:

plaintiff/ petitioner

Station-A

A. Block

Nashville, Tenn. 37203.

James R. ...
65-4720

IN THE UNITED STATES DISTRICT COURT,
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

FILED

DEC 27 1973

BRANDON J. CLARK, Clerk
By *M. J. [unclear]*, C.

JAMES E. RAY, 65477
Plaintiff

vs.

MARK E. LUTTRELL, Commissioner
of Corrections, State of Tenn.

JAMES H. ROSE, Warden, Tenn.,
State prison.

ROBERT V. MORFORD, Dep. Warden,
Tenn., State prison.

DAVID H. PACK, Attorney General
for, State of Tenn.

W. HENRY HALL, Asst. Attorney
General for, State of Tenn. defs.

Civil Action no 7338

COMPLAINT

1. ALLEGATION OF JURISDICTION:

(a) Jurisdiction of the parties in the herein subject matter is based upon the amount in recovery,

Plaintiff, acting pro se, is a citizen of the State of Tennessee under "operation of law" in the subject matter; defendant, Mark E. Luttrell (here-in-after, Luttrell) is a citizen of the State of Tennessee; defendant, James H. Rose (here-in-after, Rose) is a citizen of the State of Tennessee; defendant, Robert V. Morford (here-in-after, Morford) is a citizen of the State of Tennessee; defendant, David H. Pack (here-in-after, Pack) is a citizen of the State of Tennessee; defendant, W. Henry Hall (here-in-after, Hall) is a citizen of the State of Tennessee.

The matter in controversy exceeds, exclusive of interest and costs, the sum of ten thousand dollars.

(b) Jurisdiction founded in the existence of a federal question and the amount in controversy:

The action arises under the sixth, eighth, and fourteenth Amendments to the United States Constitution, U.S.C. Title 28 § 1331 (a) as hereinafter more fully appears. The matter in controversy exceeds, exclusive of interest and costs, the sum of ten thousand dollars.

(c) Jurisdiction founded on the existence of a question arising under particular statutes:

The action arises under Act 42 U.S.C.A. § 1983; U.S.C. Title 28 § 1343 (h) and 2201. As hereinafter more fully appears.

Plaintiff, JAMES E. DAY, Suos

Defendants, WALTER H. LUISSELL; JAMES H. ROSS; ROBERT V. WOFFORD; DAVID W. PAGE; J. HERVE HALL, and aliases

1. That on or about July 19th 1963 Plaintiff after being extradited from London, England to the United States pursuant to cr. indictment no. 16045 was lodged in the Shelby county jail in Memphis, Tennessee wherein said incident was incurred from:

2. That said jail section (A-Block) Plaintiff was confined in has been described among other things as a "vault" by reason of the windows were covered with steel plates, lights were turned twenty-four (24) hours a day; plus various other protective operations were put into effect therein by the State.

3. That since Plaintiff was a prisoner of the State of Tennessee (1963) and thereafter, the Federal Government were responsible for the formation of Plaintiff's living quarters in said jail, and the detection of such protective operations of said jail section and the inmates therein, Plaintiff and the (3) security guards.

5. That during the period plaintiff was confined in said jail, between July 19th 1963 & March 10th 1969, he was beset with (and the loss maintained by his jailers will confirm) chronic headaches & nose bleeds due to the venereal system therapy and under the guise of security medical attention was delayed when required.

6. That amongst the security officers stationed in said cell-block section with plaintiff for surveillance, their was above average absenteeism due to illnesses due to the aforementioned construction of plaintiff's quarters; at least one (1) officer therein was hospitalized with pneumonia.

7. That the aforementioned confinement conditions were devised and put into operation by the government to enervate the prisoner therein and (sic) impair his ability to defend himself under said cr. indictment and, or, induce a guilty plea therein.

8. That it is public knowledge that the aforementioned confinement practices by governments are, when the situation requires, put into operation against recalcitrant defendants in cr. prosecutions (before & after trials) when the prosecution has the support of dominant governmental & private institutions. (See Exhibit - A).

9. That it was public knowledge that those representing the State, the prosecution, and evidently in this instance the court, and those they represent, the corporate business community, were solicitous of a guilty plea by the defendant in the aforementioned cr. indictment.

10. A book published by McGraw-Hill in 1969 and authored by Prof. William J. Gantlion titled "Crime and the legal process" examines in detail, among other legal procedures, institutionalized practices employed by the State in the confinement area to influence a cr. defendant's decision particularly to avoid jury trials.

11. In an interview with A.P. reporter, on March 17th 1969, the trial judge stated that the cr. indictment was...

(Frankie Little) will only tell reporter, lawyer, in effect that he wanted a guilty plea from the state that therein occurred he (the judge) was concerned that said defendant might have got a hung jury or, 3070 been acquitted in a jury trial.

10. That on or about November 12th 1963 Attorney Percy Foreman of the Houston, Texas, Bar became counsel of record for the defendant (herein plaintiff) in the aforementioned cr. indictment by usurping that title by means of fraudulent representations to defendant's Court from the litigant's counsel of record, attorney Arthur J. Grace Sr. of the Birmingham, Alabama, Bar.

11. That said Percy Foreman aided & abetted the prosecution in the aforementioned confidential conditions of his client (Ref) through negligence in that he (Foreman) made no legal motion to alleviate said confidential conditions altho requested to do so by said client.

12. That said Percy Foreman, who has a history of defrauding clients, exploited the aforementioned confidential conditions his client was establishing under for his own (Foreman's) financial enrichment, and to the legal ends sought by the prosecution therein (a guilty plea) through a series of, among other transactions, financial frauds perpetrated against said client & Court documented as follows:

(a) On November 12th 1963 Att. Foreman presented to his client (Ref) a typed written document to sign for his (Foreman's) retainer fee.

(See Exhibit- 3)

On December 11th 1963 Att. Foreman represented to the trial court while inducing said client to falsely swear to a lawyer's oath that no money was given him for investigative purposes or attorney fees. (Transcript, pp.)-2-27. See Exhibit-C)

(b) On November 17th 1963 Att. Foreman met with his client, William

Arthur W. Spivey, of Bartlett, Alabama, in Bartlett, Texas, therein they unknown to said client entered into parcel agreements to finance Foreman's fee, to plead said client guilty, through publishing ventures.
(See Exhibit- D)

on February 3rd 1969 Att. Foreman and said client entered into literary contract pursuant to the aforementioned Foreman's fee parcel agreement providing that Att. Foreman receive the entire proceeds therein to defend said client at "trial or trials" in Shelby county, Tennessee... said contract was later amended on March 9th 1969 to provide Att. Foreman with \$100,000 on condition said client plead guilty as charged to said cr. indictment.
(See Exhibit- E)

on February 4th 5, 1969, Att. Foreman misrepresented to the trial court through two (2) written motions that while he (Foreman) had received no fee and didn't expect to receive a fee for the defense was without funds to prosecute the trial under said indictment and thereby he (Foreman) was petitioning the court for permission to take and sell pictures of his client and for the State to finance the resulting trial fee. (Transcript p. 1-2. See Exhibit- F)

on February 7th 1969 Att. Foreman in support of the aforementioned motions orally misrepresented to the trial court to be interested to receive none of the proceeds from the sale of said client's pictures. (Transcript p. 20-21. See Exhibit- G)

13. That the prosecution & trial court were to a considerable extent conversant with said Percy Foreman's heretofore described financial situation under said cr. indictment as situated by the transcript. (January 1969 transcript p. 34. See Exhibit- H)

14. That in testimony given under oath in November 1969 before the U.S. Dis. Ct. for the W.D. of Tenn., Memphis division (case no. 69-199), said Percy Foreman in effect admitted he defrauded the trial court and his client (herein plaintiff) in the aforementioned cr. indictment through the motions he (Foreman) filed, cited in count 12 herein above, by testifying in said Dis. Ct. that he & client (Ray) had verbally agreed in January 1969 to enter a guilty plea to said cr. indictment. (See Ex- J).

15. That plaintiff as defendant in said cr. indictment furnished said Percy Foreman with various items of information pursuant to a jury trial therein, including one phone number in the, Baton Rouge, Louisiana, area which he (Foreman) either 1) neglected to investigate 2) investigated and suppressed the results thereof 3) furnished said information to the prosecution & his legal associate, the late John J. Hooker sr. of the Nashville bar or, 4) availed said information to his (Foreman's) literary confidants, William Bradford Huie & Gerold Frank.

16. That subsequent to plaintiff's plea to the aforementioned cr. indictment (on March 10th 1969) he (plaintiff) indirectly furnished in the form of two (2) phone numbers in the, Baton Rouge & New Orleans, area of, Louisiana, information- including that furnished said, Percy Foreman- to the late E.T. Osborn jr. of the, Nashville, bar to have investigated. Mr. Osborn reported the resident listed under the, Baton Rouge, phone number was a parish official under the influence of a Teamster Union official in the Baton Rouge area; that the resident listed under the, New Orleans, area was- among other things - an agent of a Mideast organization distressed because of Dr. Martin Luther King's reported forthcoming, before his death, public support of the Palestine Arab cause.

17. That plaintiff would produce exhibit to indicate State agencies, including the Tenn. Attorney General's office, were conversant of the material furnished said, Percy Foreman, cited in counts 15 & 16 herein above.

17. That subsequent to the March 12th 1959 plea by defendant (now plaintiff) to the aforementioned cr. (indictment plaintiff was, on March 11th, 1959, transferred to the State penitentiary in Nashville, and forthwith placed in the punitive-administrative segregation building.

18. That plaintiff was shortly thereafter informed by then Correction's Commissioner for the State of Tennessee, "R. Harry Avery, that if he (plaintiff) would among other things make efforts to over-turn the aforementioned guilty plea he (plaintiff) would be released from segregation and treated like any other prisoner, Commissioner Avery said he was speaking for the "highest authority".

19. That thereafter plaintiff did not make efforts to have said plea reversed in the courts and subsequently said, Harry Avery, announced at a news conference that plaintiff would never be released from segregation as long as he (Avery) was Tennessee's correction's commissioner.

20. That upon entering said prison plaintiff had recurring severe nose bleeds, which were first manifested in the Shelby county, Tenn., jail, and which on two (2) occasions required medical treatment in the segregation building for relief such as coagulative injections, etc. etc. Prison physician attributed this condition to the type confinement plaintiff was incarcerated under in said Shelby county jail, a lack of natural air.

21. That plaintiff during said period, described in count 20, also experienced attacks of epilepsy and on one (1) occasion required hospital treatment where medicinal sodium bicarbonate was prescribed. Prison physician attributed this condition to the type confinement plaintiff was confined under in said Shelby county, Tenn., jail and later the...

23. That judicial attention for plaintiff's ailments, described in counts 21 & 22 herein-above, was frequently delayed under the guise of security by defendant, none, then a deputy warden.

24. That thereafter plaintiff petitioned the U.S. District for the E.D. of Tenn. (Hon. William C. Miller, presiding) for consistent relief; the court granted a hearing (Civil action no. 950, Jan. 20th 1970) and therein former State Correction's commissioner, Harry Avery, who had been dismissed from that position prior to said hearing, testified that he and Mr. William L. Barry, administrative assistant to the Gov. of Tenn. had met before plaintiff had pleaded guilty, under the aforementioned cr. indictment and decided he (plaintiff) would upon entering the State of Tenn. prison system be confined in punitive-administrative segregation... Mr. Avery offered a written document to support said testimony to justify his actions in the matter but the court ruled said document inadmissible.

25. That Tenn. Correction's commissioner, Mr. Lida Marshall, who succeeded Mr. Avery, testified in effect at said District hearing that he (Marshall) intended segregating plaintiff until his litigation was terminated.

26. That Judge Miller granted plaintiff limited relief in said hearing under a "Consent Decree" but shortly thereafter under the guise of security the defendants suspended portions of the relief ordered; and thereafter due to trivial harassment plaintiff was compelled to discontinue the relief order in toto.

27. That in April 1970 plaintiff was transferred to the Tennessee State penitentiary in Petros, Tennessee.

28. That in the Petros Institution plaintiff was confined in C-Block therein worked in quarters housing the two highest ranking prisoners, as well as having yards rights with the other inmates, and violent...

29. That in the first quarter of 1971 Mr. Robert E. Moore was appointed Warden of said, Petron, Institution and he (Moore) shortly thereafter phased out all forms of segregation by block in the prison.

30. That in May 1971 plaintiff was transferred to A-block and thereafter was under absolutely no forms of segregation in said institution, protective or security, until the prison was closed in July, 1972.

31. That on or about July 22nd 1972 plaintiff was transferred back to the State Penitentiary in, Nashville, and forthwith placed in Unit-6, the segregation building.

32. That on or about July 23rd 1972 plaintiff appeared before the prison classification board composed of former, Petron, Warden (Mr. Robert E. Moore) and defendant (Robert Norford) of the, Nashville, prison and therein said board released plaintiff, with approval of the Warden (defendant Moore), into the general prison population after plaintiff followed prison policy of signing a document requesting and taking responsibility for release into the general prison population.

33. That on or about August 1st 1972 plaintiff was called off the main prison yard to the operations office and given a document by defendant, Norford, reciting that plaintiff was being re-segregated because of previous escape attempts. (See Exhibit-1.)

34. That plaintiff then requested from defendant, Norford, to speak with the Warden, defendant Moore, about the confinement matter and thereafter defendant, Moore, verbally gave an account of reasons for the re-segregation of plaintiff, and others in effect as follows:

- (a) the newspapers might find reasons to criticize the administration if plaintiff was released into the prison population and re-segregated later.

(5) [Name] was with plaintiff in the aforementioned order. [Name] as he was incarcerated under were [Name] of his [Name] attempts to obtain a jury trial thereon, and that plaintiff [Name] he be released from segregation if he terminated his litigation.

(6) That he [Name] was ordered by [Name] authority to reevaluate plaintiff.

35. That defendant, [Name], then assured plaintiff he would be released from segregation after approximately two (2) months if the, [Name], institution was not reopened within that period; and that while plaintiff was confined in the segregation building, he would be granted the relief specified in the aforementioned order issued by [Name] Judge, William F. Miller.

36. That thereafter plaintiff was confined and did work in the segregation building and on request was permitted to go to a small enclosure (yard) behind said building, for exercise and therein single with other prisoners serving such violation sentences.

37. That the plaintiff in no more subject to assault from inmates than any other prisoner in the institution; if the plaintiff was subject to assault it would be from the State which has account to his twenty-four hours per day requirements of his confinement quarters.

38. That in September or October of 1972 plaintiff was advised by [Name] [Name] (a prison employee) and [Name] 270513 (a convict counselor) that the prison's office had informed that the Governor of Tennessee (i.e. [Name] [Name]) had personally ordered plaintiff into segregation.

39. That thereafter during an inspection of the segregation building by [Name] [Name], plaintiff was informed upon inquiry that he [Name] [Name] informed for the courts to decide then plaintiff was released from segregation.

40. That in response to a letter from plaintiff dated January 2nd, 1973 the office of the Governor of Tennessee, had knowledge of plaintiff's confinement circumstances in the prison. (See Exhibit-4).

41. That on May 1st, 1973 during a news conference, Tennessee's Governor, Don. Winfield Dunn, endorsed the herein alleged confinement conditions being practiced by State correction officials against plaintiff.

42. That after serving approximately four (4) months, until Dec. 1972, in the segregation building and not being relocated into the general prison population, and the program promised by defendant (Hoge) under Judge Miller's aforementioned order being gradually subverted by prison officials through security considerations, plaintiff returned to lock-up status.

43. That it is a tactic of State correction officials to arbitrarily confine a prisoner in segregation until he commits an overt act then justify prior to continued segregation by reason of said act.

44. That in January 1973 plaintiff protested, along with others prisoners in segregation under questionable circumstances, by refusing all meals and throwing said meals back on-to the work.

45. That thereafter, approximately four (4) days after plaintiff had begun refusing meals defendant, Worford, entered plaintiff's cell and ordered him out to be taken to the 'hole', when plaintiff turned to retrieve his shirt said, Worford, punched plaintiff in the back of the head and called a guard stationed nearby and plaintiff was then transported to the 'hole'.

46. That several days thereafter on being transferred back to the segregation building from the 'hole' plaintiff, who had had a tooth broken off earlier, was required to wait approximately three (3) weeks before receiving dental treatment on order's of defendant, Worford.

47. That on or about February 22nd, 1973 plaintiff was transferred to another more restrictive segregation building (unit-1) and in the process numerous items of personal property was confiscated or destroyed, allegedly to comply with unit-1 rules, as follows: legal books; fan; shaving equipment, etc. etc.

48. That prisoners in the present segregation building (unit-1) are subjected to a multitude of petty & serious inequities in comparison with the regular prison population as follows:

(a) dietary restrictions.

(b) hygienic restrictions.

(c) denial of recreation activities; rehabilitation programs; law library; commissary purchases, etc. etc.

49. That plaintiff is now existing under solitary confinement conditions under precise interpretation of that phrase in that in concert with being transferred to unit-1, in Feb. 1973, orders were put into effect by the Warden's office limiting plaintiff association with other prisoners, even on the segregation building yard. (See Exhibit 3).

50. That the plaintiff has now been incarcerated in the Tennessee prison system in excess of five (5) yrs. and pursuant for the interstate in the Petros institution, where the wardens were more inflexible, conditions have become progressively more onerous, and plaintiff cannot receive equity from the prison disciplinary board, which is supposed to safe guard prisoners in the process, since the Warden's office can and frequently has overruled said board when the board rules unfavorably for inmates.

51. That on or about June 12th 1977, counsel representing plaintiff, Mr. Bernard Eastwood, applied to the U.S. District Court in the U.S. District Court for relief from said confinement (See civil action no. 7006) under an order to show cause issued by said court; therein sent/ Att. Gen. E. Henry Hulse representing the Tenn. correctional commission's office made various

misrepresentations of material facts to the court, subject to proof, as follows:

Hallo- (1) the plaintiff has attempted to escape seven times from the Missouri penitentiary (p.14) and twice attempted to escape from the Brushy Mountain (Petros) institution. (p.29)

Fact- "both of these representations are numerically false".

Hallo- (2) the plaintiff was not in the general prison population at the Brushy Mountain institution. (p. 15 & 2)

Fact- "the plaintiff was in the general population at the Brushy Mountain institution beginning May, 1971; also, apparently the court has been misled respecting this matter in the Crafton case. (p.15)

Hallo- (3) the plaintiff would have the run of the entire segregation building (unit-1) and a chance to meet core prisoners. (p.17)

Fact- "prisoner working in unit-1, all of whom have asked for protection, are released from their cells for approximately one (1) hour three times per day at meal time to help feed the other prisoners & clean the block; they are restricted during said one (1) hour periods, except when working on walks with officers, to an area approximately 20x20 feet; further, under the special rules of unit-1 workers therein could be placed in the 'hole' and dismissed from their job if caught either trying to help working prisoners or roaming around the unit.

Hallo- (4) the plaintiff was reclassified after being released two (2) days into the general prison population because there had been no change in his classification. (p.22)

Fact- "the plaintiff was reclassified into the general population for four (4) days by a classification board consisting of former deputy warden James Robert T. Cook; and deputy warden, Robert W. Orford, of the Nashville prison. p.13.

2. That the defendants are guilty of the violations as follows:

(a) Defendants, Luttrell, Foco and Norford of the following violations:

- (1) of making fraudulent representations to the Dis. Ct. through the Tenn. Att. Gen's. office in the aforementioned civil suit (no. 7006) in order to prolong plaintiff's lock-up in solitary confinement.
- (2) of arbitrarily with malicious intent withholding timely medical treatment from plaintiff.
- (3) of attempting to impair plaintiff health with the approval of the present Governor of the State of Tennessee.
- (4) of arbitrarily denying plaintiff access to prison law library.

(b) Defendants, Pack, and Hille of the following violations:

- (1) of making negligent misrepresentations to the Dis. Ct. in the aforementioned civil suit: (no. 7006).
- (2) of being, conversant with, including material cited in court records herein above, exculpatory evidence respecting plaintiff's case, the defendant in the aforementioned ex. indictment through their client, the Att. Gen. of the Sixteenth Judicial Dist. of Tenn., and (sic) they owing to their vested interests are endeavoring and will continue to endeavor to obstruct and discourage plaintiff from exercising his const. right to appellate review under said ex. indictment.

(c) Defendants acting collectively of the violations as follows:

- (1) of acting in collusion to deprive plaintiff of his const. right (civil & criminal) by arbitrarily instituting, with ex-communicated police direct toward plaintiff, excessive confinement conditions in order to intimidate & subvert plaintiff's decisions in the aforementioned ex. indictment he is incarcerated under and (sic) obstruct justice.
- (2) of acting in collusion to subvert the agreements in the aforementioned civil suit (no. 7006).

53. That the plaintiff is entitled to exemplary damages because defendants should be taught that their hereinabove described operation is repugnant and violative of public policy as evidenced among other ways by National political figures & Media editorialists not infrequently pointing self-righteous fingers at what they allege to be inequities in other countries corrections & legal systems; furthermore, that it is legally reprehensible for the State to resort to the same legal tactics when arbitrarily holding a prisoner under oppressive confinement conditions as they do in controversial cr. suits, i.e., procrastinate for years before a final adjudication; a tactic which C.J. Warren Burger in a public address on Sept. 20th 1973 referred to as "...forcing them (cr. defendants) to wait endlessly while memories grow dim and witnesses move or die.

54. That as a proximate result of the defendants tactics and their predecessors plaintiff has not only been falsely imprisoned for a crime he didn't commit, as interpreted under the Anglo-American Extradition Treaty, and therein subjected to unnecessarily oppressive confinement conditions but several of those allegedly representing him, particularly said Percy Foreman, have also exploited this confinement situation for personal & prosecutorial interests.

WHEREFORE, plaintiff demands a judgment from the defendants for punitive damages of five hundred thousand dollars; and prays the honorable court overlook any technical deficiencies in this complaint until Counsel can perfect same since plaintiff is denied access to the prison Law Library, and (sic) cannot research remedial Law.

James E. Ray *James E. Ray*
Station-A #65477
Nashville, Tenn. 37203.