

**IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS HOUSTON DIVISION**

United States Court
Southern District of Texas
FILED

OCT 19 2018

David J. Bradley, Clerk of Court

**TEX CHRISTOPHER, in his capacity
as a community leader, TRACY
SHANNON, Mass Resistance Houston
Division, PASTOR CALVIN MILLER,
founder of 1 Team 1 Fight Ministries,
11LT MARK CHRISTOPHER
SEVIER, De Facto Attorney Generals
and Special Forces Of Liberty,**

Case No: **18 CV 3943**

V.

**RHEA LAWSON, Ph.D., Executive
Director Of The Houston Public
Library, SYLVESTER TURNER, in his
official capacity as Mayor of Houston
*Defendants***

**DEMAND FOR TEMPORARY,
PRELIMINARY, AND
PERMANENT INJUNCTION**

COMPLAINT

*"Silence in the face of evil is itself evil: God will not hold us guiltless. Not to speak is to speak.
Not to act is to act." — Dietrich Bonhoeffer*

1. The Marriage And Constitution Restoration Act:

<https://youtu.be/VhFM-Hg7298>

2. The Lemon Test

https://youtu.be/_hYslZWsjxA

3. Secular Humanism is a Religion

<https://youtu.be/TeSM7cbXSEI>

4. Absolutism: Don't We All Have to Find Truth for Ourselves – Timothy Keller

<https://youtu.be/TVI9uYcPRc8>

1. NOW INTO COURT, come Plaintiffs, Tex Christopher, a community leader, Tracy Shannon, co-director of Mass Resistance Houston Division, Pastor Calvin Miller, founder of 1 Team 1 Fight Ministries,¹ 1LT Chris Sevier Esq. a former Judge Advocate General and Congressional Liaison between the House and Senate on social issues, seeking a temporary, preliminary, and permanent injunction against the Houston Public Library.² See marriagerestorationact.com. This is a simple case about whether the Houston Public Library's conduct has violated the First Amendment Establishment Clause of the United States Constitution.
2. The Library's partnership with non-secular organizations to host, authorize, permit, sponsor, pay-for, promote, feature, display, favor, respect, and endorse the Drag Queen Story Hour at the Houston Public Library and its subdivisions for 2 to 10 year olds in a non-designated public forum fails the prongs of the *Lemon* Tests and violates the Establishment Clause of the First Amendment to the United States Constitution and 42 U.S.C. § 1983. The Library's decision to host, sponsor, promote, and endorse the Drag Queen Story Hour is also illegal under Tex. Penal Code § 43.24 (SALE, DISTRIBUTION, OR DISPLAY OF HARMFUL MATERIAL TO MINOR).³ The Plaintiffs seek a temporary, preliminary, and permanent injunction to enjoin the

¹ see <https://1team1fightministries.com/>,

² Attorney Jason Rowe is licensed to practice law in Texas. He will be appearing on behalf of Plaintiffs Christoper, Miller, and Shannon after he completes the requirements to appear. Bar Card Number: 24073538 Also, Attorney Eric Dick Esq. will be appearing as counsel on behalf of the non-lawyer litigants.

³ Sec. 43.24. SALE, DISTRIBUTION, OR DISPLAY OF HARMFUL MATERIAL TO MINOR. (a) For purposes of this section: (1) "Minor" means an individual younger than 18 years. (2) "Harmful material" means material whose dominant theme taken as a whole: (A) appeals to the prurient interest of a minor, in sex, nudity, or excretion; (B) is patently offensive to prevailing standards in the adult community as a whole with respect to what is suitable for minors; and (C) is utterly without redeeming social value for minors. (b) A person commits an offense if, knowing that the material is harmful: (1) and knowing the person is a minor, he sells, distributes, exhibits, or possesses for sale, distribution, or exhibition to a minor harmful material; (2) he displays harmful material and is reckless about whether a minor is present who will be offended or alarmed by the display; or (3) he hires, employs, or uses a minor to do or accomplish or assist in doing or accomplishing any of the acts prohibited in Subsection (b)(1) or (b)(2). (c) It is an affirmative defense to prosecution under this section that the sale, distribution, or exhibition was by a person having scientific, educational, governmental, or other similar justification. (c1) It is a defense to prosecution under this section that the actor was the spouse of the minor at the time of the offense. (d) An

Library from (1) partnering with non-secular organizations to host the Drag Queen Story Hour and from (2) hosting the Drag Queen Story Hour in a public facility for minors. Plaintiffs will file separate motions for injunctive relief with supporting memorandums. The Plaintiffs objection to the Library's conduct is not based on "bigotry" but on secular biology.

3. On October 16, 2018, the United States District Court for the Western District of Louisiana temporarily enjoined the Lafayette Public Library from sponsoring or hosting the Drag Queen Story Hour at a hearing. See *Guidry v. Elbertson*, 6:18-cv-01232-RRS-PJH (W.D. L.A. 2018).

4. The Plaintiffs have filed a \$10,000 bond contemporaneously with this action and ask for an immediate temporary restraining order to issue to prevent the Houston Public Library or its subdivisions from sponsoring and hosting the Drag Queen Story Hour on October 27, 2018.

I. NATURE OF THE CASE AND SUMMARY OF TEN KEY ISSUES

5. Here is a summary of ten key issues involved in this cause of action.⁴ First, the Public Library has a duty under Article VI to not form partnership with non-secular organizations and to not endorse non-secular programing in a non-designated public forum.⁵ Second, under the Free Exercise Clause of the United States Constitution, the Plaintiffs stipulate that any adult has the right to self-identify as transgender, to have parody wedding ceremonies, and to live as married

offense under this section is a Class A misdemeanor unless it is committed under Subsection (b)(3) in which event it is a felony of the third degree.

⁴ The evidence shows that when people say that "love is love" what they really mean is that they are perfectly ok with government assets being used to crush anyone who believes that homosexuality is immoral or subversive to human flourishing. Such a position is categorically "unloving." It is more accurate to say that "love without truth is shallow sentimentality." One thing that the fake gay civil rights movement has managed to prove is that people who are "intolerant" of "intolerant people" are "intolerant;" people who are "judgmental" against "judgmental people" are "judgmental;" people who are "dogmatic" about not being "dogmatic" are themselves "dogmatic." As Justice Kennedy stated in *Masterpiece Cakeshop v. the Colorado Civil Rights Commission*, 584 U. S. ____ (2018), "tolerance has to cut both ways."

⁵ The Senators and Representatives before mentioned, and the Members of the several State Legislatures, and all executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution; but no religious

people do.⁶ Third, the Plaintiffs assert that like government respected parody marriage, the Library's decision to host the Drag Queen Story Hour fails the *Lemon* Test and, therefore, violates the First Amendment Establishment Clause for being a non-secular sham that cultivates an indefensible legal weapon against non-observers of the religion of Secular Humanism and that excessively entangles the government with the religion of Secular Humanism.⁷ Fourth, the Plaintiffs would not object to the Library hosting "man-woman marriage" story time, since

⁶ The Plaintiffs stipulate that under the Free Exercise Clause of the First Amendment of the United States Constitution, whether any Christian Republican conservative likes it or not, anyone living in the state of Texas has the fundamental right to self-identify as anything they would like, to include self-identifying as a homosexual, transgender, zoophile, objectophile, polygamist, etc. Furthermore, anyone in the State of Texas can have parody wedding ceremonies and live as married people do for better or worse. A man can have a parody wedding ceremony with a man and believe that man is his wife until blue in the face, if he thinks that is wise. The Plaintiffs zealously defend the right of any individual to self-identify as anything they would like and to have their own religious beliefs and to practice them as long as they do not violate existing federal and state law. Winston Churchill once said, "Where there is a lot of free speech, there is a lot of stupid speech." While the Plaintiffs are proud to live in a country where "stupid speech" is permitted. If a group of adult males who self-identify as transvestites organized a transvestite story hour on their own at a private location and did not form a partnership with the public library, the Plaintiffs would not have a First Amendment objection. However, it could be the case that the event would be unlawful under Tex. Penal Code § 43.24 if the exhibition targeted 2 to 10 year olds.

⁷ To pass muster under the Establishment Clause, a practice must satisfy the *Lemon* test, pursuant to which it must: (1) have a valid secular purpose; (2) not have the effect of advancing, endorsing, or inhibiting religion; and (3) not foster excessive entanglement with religion. *Id.* at 592 (citing *Lemon v. Kurtzman*, 403 U.S. 602 (1971)). It is important to understand that government action "violates the Establishment Clause if it fails to satisfy any of these prongs." *Edwards v. Aguillard*, 482 U.S. 578, 583 (1987); *Agostini v. Felton*, 521 U.S. 203, 218 (1997). The evidence will show that the Houston Public Library's decision to host the Drag Queen Story Hour fails all three prongs of the *Lemon* Test. At the core of the "Establishment Clause is the requirement that a government justify in secular terms its purpose for engaging in activities which may appear to endorse the beliefs of a particular religion." *ACLU v. Rabun Cnty. Chamber of Commerce, Inc.*, 698 F.2d 1098, 1111 (11th Cir. 1983). This secular purpose must be the "pre-eminent" and "primary" force driving the government's action, and "has to be genuine, not a sham, and not merely secondary to a religious objective." *McCreary Cnty, Ky. v. ACLU of Ky.*, 545 U.S. 844 (2005). Under this second prong of the *Lemon* test, courts ask, "irrespective of the . . . stated purpose, whether [the state action] . . . has the primary effect of conveying a message that the [government] is advancing or inhibiting religion." *Indiana Civil Liberties Union v. O'Bannon*, 259 F.3d 766, 771 (7th Cir. 2001). The "effect prong asks whether, irrespective of government's actual purpose," *Wallace v. Jaffree*, 472 U.S. 38, 56 n.42 (1985), the "symbolic union of church and state...is sufficiently likely to be perceived by adherents of the controlling denominations as an endorsement, and by the nonadherents as a disapproval, of their individual religious choices." *School Dist. v. Ball*, 473 U.S. 373, 390 (1985); *see also Larkin v. Grendel's Den*, 459 U.S. 116, 126-27 (1982) (even the "mere appearance" of religious endorsement is prohibited). In the wake of the *Obergefell* and *Windsor* p utsch, there has not been a land rush on gay marriage, but there has been a land rush by Secular Humanists to persecute Christians for refusing to endorse a religious worldview that non-observers of Secular Humanism believe is self-evidently immoral, obscene, and subversive to human flourishing. While "gay marriage" is "fake marriage," the government's endorsement of homosexual orthodoxy has lead to the "very real" persecution of Christians. The unconstitutional codification of the fake gay civil rights movement amount to an indefensible "legal weapon that no [Christian or non-observer of Secular Humanism] can obtain." *City of Boerne v. Flores*, 521 U.S. 507 (1997).

man-woman marriage policies and practices are natural, neutral, non-controversial, and secular in nature.⁸ Fifth, the Plaintiffs have provided testimonials from ex-gays, medical experts, persecuted christians, and licensed ministers, all of whom attest under oath that there is no evidence of a gay gene, that the idea that sexual orientation is not predicated on immutability is not proven, and that sexual orientation is a dogma that is predicated on a series of unproven faith-based assumptions that are inseparably linked to the religion of Secular Humanism.⁹ Sixth, the United States Supreme Court has already recognized that Secular Humanism is a religion for purposes of the First Amendment Establishment Clause in *Torcaso v. Watkins*, 367 U.S. 488 (1961) and re-acknowledged in *Edwards v. Aguillard*, 482 U.S. 578, 583 (1987).¹⁰

⁸ Man-woman marriage and man-woman marriage policies are natural, neutral, and non-controversial. Man-woman marriage policies are considered secular and not a sham because they actually accomplish their intended purposes and do not put religion over non-religion. Traditional marriage arose out of the “the nature of things” and did not arise out of a desire to acquire political power and to use government as a tool to show the irresponsible gospel of moral relativism down the throats of our citizens.. See G. Quale, *A History of Marriage Systems* 2 (1988); cf. M. Cicero, *De Officiis* 57 (W. Miller transl. 1913). *Obergefell* at 5 (Roberts Dissent). Roberts in his dissent in *Obergefell* also stated: “In his first American dictionary, Noah Webster defined marriage as “the legal union of a man and woman for life,” which served the purposes of “preventing the promiscuous intercourse of the sexes, . . . promoting domestic felicity, and . . . securing the maintenance and education of children.” 1 *An American Dictionary of the English Language* (1828).

⁹(DE _ Lisa Boucher ¶¶ 1-10;; DE _ Quinlan ¶¶ 1-37;; DE _ Pastor Cothran ¶¶ 1-50;; DE _ Dr. King ¶¶ 1-20;; DE _ Dr. Cretella ¶¶ 1-20;; DE _ Goodspeed ¶¶ 1-20;; DE _ Grace Harley ¶¶ 1-25;; DE _ Pastor Cuozzo;; ¶¶ 1-21;; DE _ Pastor Farr ¶¶ 1-33;; DE _ Pastor Penkoski ¶¶ 1-34;; DE _ Pastor Cairns ¶¶ 1-30; DE _ Christian Resistance ¶¶ 1-21;; DE _ Special Forces Of Liberty ¶¶ 1-34) See the *amicus* briefs of the National Alliance of Black Pastors; the Center For Garden State Families and Voice Of The Voiceless; Coalition of Doctors Defending Reparative Therapy, and Mass Resistance and American Family Association of PA.

¹⁰ (“Among religions in this country, which do not teach what would generally be considered a belief in the existence of God, are Buddhism, Taoism, Ethical Culture, Secular Humanism, and others.” See Also *Washington Ethical Society v. District of Columbia*, 101 U.S. App. D.C. 371, 249 F. 2d 127 (1957); 2 *Encyclopaedia of the Social Sciences*, 293; J.Archer, *Faiths Men Live By* 120—138, 254—313 (2d ed. revised by Purinton 1958); Stokes & P feffer, *supra*, n.3 ,at 560. *Welsh v. U.S.*, 1970398 U.S. 333 (U.S. Cal. June 15); *Wells v. City and Cnty. of Denver*, 257 F.3d 1132 (2001)). The Court can take judicial notice that a majority of legislative bodies will introduce a resolution that resolves that Secular Humanism is a religion for the purposes of the First Amendment Establishment Clause contemporaneously with the Marriage And Constitution Restoration Act at the 2019 legislative session. *Landell v. Sorrell*, 382 S3d. 91 (2nd Cir. 2004); *Lebron v. Secretary of Florida*, 772 F3d 1352 (11th Cir 2014); *Brand v. Motley*, 526 F3d 921 (6th Cir. 2008)(Even the Courts of appeals can take judicial notice of legislative facts). In view of the decision in *Real Alternatives*, the organizations that the Houston Public Library has partnered with to permit, authorize, sponsor, and endorse the Drag Queen Story Hour are non-secular because they are full, organized, and have their own private moral code by which its members can live their daily lives by. See *Real Alternatives, Inc. v. Burwell*, 150 F. Supp. 3d 419, 440—41 (M.D. Pa. 2015), *aff’d sub nom. Real Alternatives, Inc. v. Sec’y Dep’t of Health & Human Servs.*, No.16-1275, 2017 WL3324690 (3d Cir. Aug. 4, 2017).

Seventh, while there has been no landrush on gay marriage in the wake of the *Obergefell v.*

Hodges, 135 S. Ct. 2584 (2015)putsch,¹¹ there has been a landrush by devout Secular Humanists to persecute Christians and to infiltrate public elementary schools and public library for the purpose of indoctrinating children on a religious worldview on sex, faith, morality, and marriage that is questionably real and moral and has a tendency to erode community standards of decency.

¹² Eighth, while “gay marriage” is “fake marriage,” the Harris County decision to issue marriage licenses to self-identified homosexuals has amounted to a license for LGBTQ activists to viciously and violently oppress Christians and to misuse government assets to indoctrinate minors to Secular Humanism. Ninth, the Library’s unlawful decision to host Drag Queen Story Hour is unlawful under Tex. Penal Code § 43.2 because it exposes children to per se sexual

In *Real Alternatives*, the Seventh Circuit Court of Appeals stated: “we detect a difference in the “philosophical views” espoused by [the litigants], and the “secular moral system[s]...equivalent to religion except for non-belief in God” that Judge Easterbrook describes in *Center for Inquiry*, 758 F.3d at 873. There, the Seventh Circuit references organized groups of people who subscribe to belief systems such as Atheism, Shintoism, Janism, Buddhism, and secular humanism, all of which “are situated similarly to religions in everything except belief in a deity.” *Id.* at 872. “These systems are organized, full, and provide a comprehensive code by which individuals may guide their daily activities.” Instead having across or the ten commandments, the LGBTQ church has the gay pride flag and their own commandments, such as if you disagree with LGBTQ ideology you are a bigot worth marginalizing. The unproven naked truth claims evangelized by the LGBTQ church such as (1) there is a gay gene, that (2) people can be born in the wrong body, that (3) same-sex sexual activity checks out with the human design, that (4) same-sex buggery is not immoral, and that (5) people come out of the closet are baptized gay consists of a series of unproven faith based assumptions that are implicitly religious and take a huge amount of faith to believe are even plausible.

¹¹ The raw numbers tell the tale. Prior to the *Obergefell* decision two years ago, the 7.9 percent of gays who were married would have amounted to 154,000 married gay couples. Two years later, this had grown to 10.2 percent or 198,000 married couples. Gay marriage is a sham policy is a sham. Gay marriage is fake marriage, but the Persecution of Christians in the wake of the *Obergefell* putsch is real.

¹² The United States Supreme Court has emphasized that there are “heightened concerns with protecting freedom of conscience from subtle coercive pressure in the elementary and secondary public schools,” *Lee v. Weissman*, 505 U.S. 577, 592, 112 S.Ct. 2649, 120 L.Ed.2d 467 (1992), and the federal courts have thus “been particularly vigilant in monitoring compliance with the Establishment Clause” in the public-school context, see *Edwards v. Aguillard*, 482 U.S. 578, 578-583 (1987). It follows that “heightened concerns” apply here to the Houston Public Library in the children’s division, which is a public taxpayer funded facility, just like elementary schools are, with librarians whose salaries are paid for by the taxpayers, just like public elementary teachers are. The real reason why the Secular Humanists employees at the Library want to have the Library attached to Drag Queen Story Hour instead of having self-identified transvestites plan the Drag Queen Story by themselves at a private location with materials that they paid for and selected is because the whole point of the partnership is to communicate to impressionable minors, to the Plaintiffs, and to all Christians in Texas that Secular Humanism as advocated by the LGBTQ church is the favored religion of the Library, Texas, and the United States. It is an imperialistic political and religious power play that violates the Library’s own policy and constitutes an evil that the United States Constitution prohibits.

immorality and is the end result of the government's reckless and unconstitutional decision to respect and entangle itself with LGBTQ doctrine. The Library is not only unconstitutionally endorsing "religious speech" in hosting the Drag Queen Story Time, it is unlawfully promoting "obscene speech" through an exhibition that targets minors and violates community standards of decency.¹³ Tenth, by bringing this case, the Plaintiffs are defending the integrity of the 1964 civil rights movement lead by Pastor Martin Luther King Jr, which was actually based on secular immutability and genetics.¹⁴

¹³ See *Miller v. California*, 413 U.S. 15 (1973); *Jacobellis v. Ohio*, 378 U.S. 184 (1964), the Supreme Court famously stated, "I shall not today attempt further to define the kinds of material I understand to be embraced within that shorthand description [sexual immorality], and perhaps I could never succeed in intelligibly doing so. But I know it when I see it." Just as a call by an Islamic Imam for immediate acts of violence through jihad is "religious speech," it also constitutes dangerous unprotected harmful speech. See *Schenck v. United States*, 249 U.S. 47 (1919) (shouting "fire" in a movie theater is not protected speech for purposes of the First Amendment). "Obscenity is not within the area of protected speech or press." *Court v. State*, 51 Wis. 2d 683, 188 N.W.2d 475 (1971) vacated, 413 U.S. 911, 93 S. Ct. 3032, 37 L. Ed. 2d 1023 (1973) and abrogated by *State v. Petrone*, 161 Wis. 2d 530, 468 N.W.2d 676 (1991); *Ebert v. Maryland State Bd. of Censors*, 19 Md. App. 300, 313 A.2d 536 (1973). Obscenity is not protected expression and may be suppressed without a showing of the circumstances which lie behind the phrase "clear and present danger" in its application to protected speech. *Roth v. United States*, 354 U.S. 476, 485, 77 S.Ct.1304,1309,1L. Ed. 2d 1498. *United States v. Gendron*, 2009 WL 5909127 (E.D. Mo. Sept. 16, 2009) report and recommendation adopted, S2 4:08CR 244 RWS, 2010 WL 682315 (E.D. Mo. Feb. 23, 2010); *Chapin v. Town of Southampton*, 457 F. Supp. 1170 (E.D.N.Y. 1978); *Sovereign News Co. v. Falke*, 448 F. Supp. 306 (N.D. Ohio 1977); *City of Portland v. Jacobsky*, 496 A.2d 646 (Me. 1985). The Mayor, the Attorney General, or the Governor could themselves shut down Drag Queen Story Hour because the State of Texas has a compelling interest to uphold community standards of decency. *Paris Adult Theatre I v. Slaton*, 413 US 49 (1973). Courts have found that "any school boy knows that a homosexual act is immoral, indecent, lewd, and obscene. Adult persons are even more conscious that this is true." *Schlegel v. United States*, 416 F.2d 1372, 1378 (Ct. Cl.1969). Accordingly, the Library knows that through their partnership with non-secular organizations that the goal is to indoctrinate minors to non-secular ideology that is "immoral, indecent, lewd, and obscene." For centuries homosexual orthodoxy has been classified as obscene and the fact remains that "to simply adjust the definition of obscenity to social realities has always failed to be persuasive before the Courts of the United States." *Ginsberg v. New York*, 390 U.S. 629, 639-40, 88 S. Ct. 1274, 20 L. Ed. 2d 195 (1968); *Mishkin v. State of New York*, 383 U.S. 502, 509, 86 S. Ct. 958, 16 L. Ed. 2d 56 (1966); and *Bookcase, Inc. v. Broderick*, 18 N.Y.2d 71, 271 N.Y.S.2d 947, 951, 218 N.E.2d 668, 671 (1966).

¹⁴ Anyone who compares the "gay civil rights plight" to the "race-based civil rights plight," whereas the race-based civil rights plight was actually based on immutability, only to not really mean it, has engaged in acts of fraud and racial animus in-kind that manages to be emotionally, intellectually, sexually, and racially exploitative. To oppose the government's unconstitutional endorsement of homosexual ideology is to defend the civil rights movement lead by Pastor Martin Luther King Jr. To embrace the fake gay rights movement is deeply offensive to people of color who were required at one point to walk to school, drink from the colored water fountain, and undergo mistreatment for characteristics that are without question based on genetics and immutability, not emotional faith-based beliefs. If a government official supports the government's endorsement of gay rights, they are refusing to think logically and can be accused of bigotry in-kind. Legislators support this act support the rule of law and the supremacy of the United States Constitution. Those who oppose this act that balances the Free Exercise Clause with the Establishment

II. PROCEDURAL POSTURE A HOUSEKEEPING ISSUES

6. This case presents itself as an emergency. There are no disputed facts in this case. Nearly all of the facts are a matter of public record. The Plaintiffs are waiting for the custodian of the records to respond to the Plaintiffs FOIA request.

7. Plaintiff Sevier seeks ECF filing access. Attorney Jason Rowe will be at least one of two lawyers appearing on behalf of Plaintiffs Tex Christopher, Tracy Shannon, and Pastor Calvin. Plaintiff Sevier asks the Court to grant leave to permit Attorney Cynthia Burris, former Miss South Carolina and member of De Facto Attorney Generals, to make a special appearance Pro Hace Vice to assist the non-lawyer plaintiff's counsel.

8. Because this is a Constitutional controversy, the Plaintiffs will not put form over substance. Accordingly, the Plaintiffs will not oppose any requests sought by the Defendant for additional time to respond to any pleading or for request to plead over the jurisdictional limit.

9. The Plaintiffs will not oppose any third party that would like to file *amicus* briefs, even if the brief supports the position of the Defendants. The Plaintiffs respectfully ask the Court to permit *amicus* filers to submit briefs.¹⁵

III. JURISDICTION

10. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1343(3) and 1343(4). For causes of action arising under the First and Fourteenth Amendments to the Constitution of the United

Clause are on the wrong side of history and reality. While there are thousands of ex-gays, there is no such thing as an "ex-black person." Help us safeguard and restore the integrity of the civil rights movement lead by Dr. Martin Luther King Jr. by standing behind the Marriage And Constitution Restoration Act.

¹⁵ "Although there is no formal rule governing the filing of *amicus curiae* briefs, district courts possess the inherent authority to grant or refuse leave to *amicus* parties." *Georgia Aquarium, Inc. v. Pritzker*, 135 F.Supp.3d 1280 (N.D.Ga.2015). "A district court exercises wide discretion in deciding whether to grant or deny leave to file an *amicus* brief." *United States v. Board of County Commissioners of the County of Otero*, 184 F.Supp.3d 1097 (D.N.M. 2015). See also: Brief of an *Amicus Curiae* FRAP Rule 29;; Pleadings Allowed; Form of Motions and Other Papers FRCP Rule 7.

States of America, 42 U.S.C. §§ 1983 and 1988, and 28 U.S.C. §§ 2201 and 2202.

Supplemental jurisdiction is invoked pursuant to the constitution and laws of the State of Louisiana.

IV. PARTIES

11. The Plaintiffs are taxpayers in Texas. They all have residents in Houston and have continuously paid taxes here. The Plaintiffs are Christ Followers who are advocates for originalism, when it comes to Constitutional interpretation. For the State of Texas, the Plaintiffs work directly through the Special Forces Of Liberty and De Facto Attorney Generals with the House and Senate as authors of (1) the Human Trafficking And Child Exploitation Prevention Act,¹⁶ (2) the Admission Act, (3) Marriage And Constitution Restoration Act and concurrent resolution,¹⁷ (4) the Stop Social Media Censorship Act,¹⁸ (5) the Resolution that declares that Secular Humanism is a religion,¹⁹ (6) the Life Appropriation Act,²⁰ and (7) the Elevated Marriage Act, and (9) other measures. A substantial part of the Plaintiffs legislative efforts will directly generate millions of dollars for the State of Texas annually to uphold community standards of decency, ro strengthen marriages, and to safeguard children from sexual exploitation by adults who do not know the objective differences between right and wrong, real and fake, and secular and non-secular.²¹

¹⁶[http://humantraffickingpreventionact.com/;";](http://humantraffickingpreventionact.com/;) <https://youtu.be/Yit6YveYQ0Y>

¹⁷ [http://marriageconstitutionrestorationact.com/;";](http://marriageconstitutionrestorationact.com/;) <https://youtu.be/VhFM-Hg7298>

¹⁸ [http://stopsocialmediacensorshipact.com/;";](http://stopsocialmediacensorshipact.com/;) https://youtu.be/D66NZpe_ZP4

¹⁹ <https://youtu.be/TeSM7cbXSEI>

²⁰ [http://lifeappropriationact.com/;";](http://lifeappropriationact.com/;) <https://youtu.be/AO-hJxkBc4I>

²¹ The Drag Queen Story hour for children follows in the wake of *Obergefell v. Hodges*, 135 S. Ct. 2584 (2015) and is the end result of the governments immoral and unconstitutional entanglement with the LGBTQ church which is part of the religion of Secular Humanism. The Legislation advocated by the Plaintiffs with the Texas State House will require the State of Texas to completely and permanently get out of the parody marriage business and to disentangle itself with the LGBTQ community because it is what the Establishment Clause of the First Amendment Requires. The Plaintiffs, as special tax payers, do not want a penny of their tax dollars being used by government actors to entangle the government with the religion of Secular Humanism i.e. postmodern western moral relativism

12. The Plaintiffs and/or their organizations, Tex Christopher Enterprises, 1 Team 1 Fight Ministries, the Special Forces Of Liberty, Mass Resistance, and De Facto Attorney Generals, are card carrying members of the Houston Public Library. The Plaintiffs have been violently and/or viciously persecuted by the LGBTQ church and devout members of the Secular Humanist religion for refusing to respect and endorse a worldview that is objectively immoral, obscene, and subversive to human flourishing. The Plaintiffs have residences, pay, and continue to pay all types of taxes in the State of Texas and to Harris County. To avoid litigation, the Plaintiffs waited to see how the Library would respond to the hundreds of complaints and petitioners served onto the Library, demanding that the Library terminate its partnership with non-secular organizations who sought to display the Drag Queen Story Hour exhibition for children at the public library for 2 to 10 year olds. The Plaintiffs filed complaints with the library in accordance with the Library's guidelines. The Plaintiffs believe that the basis behind the Library's partnership with non-secular organizations and the decision to sponsor the Drag Queen Story Hour is a sham and that the Library's true goal is to authorize self-identified Secular Humanists to indoctrinate minors to their Secular Humanism religious worldview under the guise that the government approves. The Plaintiffs belief that the Drag Queen Story Hour has nothing to do with "diversity" and "tolerance" but with brainwashing the children of Houston to a religious worldview that is destructive, dishonest, desensitizing, dehumanizing, depersonalizing, deranged, and dangerous. The Plaintiffs believe that the Library's decision to host the Drag Queen Story Hour amounts to a form of child sexual exploitation, racism in-kind, emotional manipulation, and intellectual dishonesty. By partnering with non-secular organizations and by hosting the

and expressive individualism. The Public Library is a publicly funded facility that is open to the public. The Plaintiffs are parents, and they do not want their children or other children exposed to the Drag Queen Story Hour with the government's stamp of approval.

Drag Queen Story Hour, the Library has given the Plaintiffs the apprehension that the Secular Humanism is the favored religion of the Houston public library, the State of Texas, and of the United States. The Plaintiffs are all non-observers of the religion of Secular Humanism and are Christ Followers. The Plaintiffs believe that LGBTQ ideology is immoral, obscene, and subversive to human flourishing and that LGBTQ ideology is inseparably linked to the religion of Secular Humanism. The Plaintiffs believe that silence in the face of evil is to cooperate with it. The Plaintiffs believe that to enable acts of immorality is itself an act of immorality. The Plaintiffs do not want the Library or the city to appropriate their tax dollars to pay for, promote, host, and sponsor the Drag Queen Story Hour because it causes the Plaintiffs to feel coerced by the simple act of paying taxes. The Plaintiffs all have children living in Houston, and they do not want their children being exposed to the Drag Queen Story Hour at the Houston Public Library.

13. Tex Christopher has been using the Houston Public Library for over 13 years.²² Annually, Tex Christopher purchases books from the Library at the book drive. Plaintiff Tex Christopher

²² Tex Christopher has over 25 years of professional political successes, business leadership, entrepreneurship and corporate growth accomplishments. He has served his local, state and national alliances relentlessly. In corporate America, as CEO, he managed a team of 500 insurance professionals to train over 50,000 licensed agents in Health and Life Insurance coverages in the health sector and was a regarded health care expert, and was asked to dissect our national healthcare system in early 2000 which brought him before many major industry leaders and politicians grappling with the proposed nationalized healthcare agenda under Hillary Clinton which was soundly defeated. In addition, as CEO, he also worked with a team of 432 to instruct 40,000 Tax Attorneys and CPA's with the financial crisis in America at the turn of the century. He was on the forefront leading 5,000 employees in energy deregulation in the state of Texas and helped solve many problems for the city and state, assisted veterans programs that are now duplicatable across the country, and defeated the HERO Ordinance in Houston (taken to the Texas Supreme Court) which jeopardized families in our communities. He is currently working on major legislation to take Texas off the #1 list for the sex trade. His leadership with Tex Christopher Studios is creating a doorway to the next seismic shift from Hollywood to Texas that is currently underway and the state of Texas is very hopeful with current developments, starting with a focus on the East Side of Houston and the resulting economic development zones and tourism impact in our major cities. More importantly, he is a leader with vision and a sought after professional speaker, inspiring over 1.5 million Americans. Lastly, Mr. Christopher is a statesman who stands up for his country with proven results and makes an impact in the community with a focus for economic growth – creating jobs and helping people are his passions. He stands for righteousness and being a voice for the voiceless. Tex Christopher is a leader's leader and our U.S. Congress representative has recently recognized his accomplishments with the launching of Tex Christopher Studios.

homeschooled his two daughters. For over a decade, he regularly used the Houston Public Library to educate his daughters have attended story time at the Library. Plaintiff Tex Christopher is a lobbyist for Human Trafficking and Child protection legislation and is the director of the Texas chapter of the Special Forces Of Liberty. (see declaration of Tex Christopher).

14. Tracy Shannon has children and resides in Houston. She was married to a man who after fifteen years of marriage decided to start continuously crossdress and to self-identify as a transgender, leaving Plaintiff Shannon for another she-male. A brutal custody battle ensued between Plaintiff Shannon and her former husband for years that involved a series of transgender lobbying firms. The transgender church used the legal fight to advance their asinine and unconstitutional political rampage through the courts, while completely victimizing the every living daylight out of Plaintiff Shannon and her children for reasons that are completely non-secular and immoral. Because the facts of Plaintiff Shannon's merciless persecution by the transgender church are too numerous and too compelling, a separate declaration will be filed explaining her interests in the case. Having seen first hand (1) the evils of transgenderism, (2) what her former husband's decision to attempt to transition to a female has done to her children, (3) the destructive true objective of the transgender church, she adamantly objects to the Library sponsoring, endorsing, authorizing, and promoting the Drag Queen Story Time.

15. Pastor Calvin Miller is a proud Houstonian who grew up in South Park and Sunnyside neighborhoods. He is prior military and the Founder of 1Team1Fight Ministries.

<https://1team1fightministries.com/>. He is a powerhouse intercessor/evangelist, serving in the community, homeless districts & prison ministry. He has committed to teaching a weekly life

skills curriculum & bible study to residents at a local apartment complex. In addition to adding author to his repertoire. Pastor Calvin is a pastor with a backbone, who has no interest in watering down the truth. Pastor Calvin is a black American. He and his co-Plaintiffs believe that for any government official to equate the “gay civil rights plight” to the “race-based civil rights plight,” whereas the “race-based civil rights plight was actually predicated on immutability and genetics, only to not really mean it is an act of fraud and racial animus in-kind that manages to be racially, sexually, intellectually, spiritually, and emotionally exploitative. Self-identified homosexuals did not have to walk to school, ride on the back of the bus, or drink from a different water fountain because of characteristics that are actually based on immutability. Pastor Calvin objects to the Drag Queen Story Hour because it undermines the validity of the civil rights movement and for the other reasons including in this action. Pastor Calvin does not want his children asking him “why does the man in a dress reading books to us at the children’s library say that he is a lady?”

16. Chris Sevier Esq. is a former Judge Advocate General who is a combat veteran of OIF rule of law mission. He is a member of the Special Forces Of Liberty and De Facto Attorney Generals. Plaintiff Sevier is a seasoned whistleblower who has been the target of countless reprisal campaigns conducted by Secular Humanists in office. Plaintiff Sevier has been falsely accused of everything under the sun in the same way that Christine blasey Ford accused Justice Kavanaugh of raping her in 1982 under the implausible presumption that the ends justify the means. Plaintiff Sevier was brutalized by a pro-lesbian Assistant District Attorney in Harris County for religious, economic, and political reasons.²³ Plaintiff Sevier is offended and objects

²³ Plaintiff Sevier has been viciously and relentlessly targeted by Krisann Hodges at the Board of Professional Responsibility of the State of Tennessee because he is a Christian who refuses to play “go along get along” with immorality. See *Sevier v. Jones et. al.*, 3:11-00435, (M.D. Tenn. Aug. 1, 2011) and *Sevier v. Windle et al.*,

to the Library's partnership with non-secular organizations to host the Drag Queen Story Hour. Plaintiff Sevier is a non-observer of the religion of Secular Humanism and is an overseas Christian missionary. Plaintiff Sevier is also an international recording artist with a track record of influencing policy on an international scale. Plaintiff Sevier works directly with the Federal and State legislature. He works directly with the members in the State House in Texas and with the Congress on matters dealing with Judicial misconduct, Constitutional integrity, human trafficking prevention, abortion, marriage, and child exploitation. Plaintiff Sevier reports back to DOD, DOJ, and Senate oversight on all legislative and legal matter that he is involved with, and

3:2011-cv-00246 (M.D. T.N. 2011). Krisann Hodges is the Lois Lerner of the Legal world. Furthermore, Harris County's Assistant District Attorney, Jane Waters, along with Judge Margaret are guilty of unbelievable amount of unethical and judicial misconduct in racketeering to facilitate malicious prosecution and abuse of process for political and economic reasons. Both individuals should be disbarred and prosecuted by the Department of Justice for they immense about of fraud, waste, mismanagement, and abuse. These two female lawyers are an insult to the rule of law and have violated a series of criminal statutes in targeting Plaintiff Sevier because they disagree with him for religious and political reasons. Plaintiff Sevier was wrongfully arrested on January 1, 2011 after being violently assaulted by his former Father-in-law, Frank McGuyer of McGuyer homebuilders in Houston. Plaintiff Sevier had the case dropped on January 3, 2011 before Judge Fields because the evidence was overwhelming that Frank McGuyer committed the very crime that Plaintiff Sevier was falsely accused of. Subsequently, Plaintiff Sevier sued Frank McGuyer in Federal District Court in the Middle District of Tennessee in early February of 2011 for assault and malicious prosecution. See *Sevier v. McGuyer*, 3:11-0450 (M.D. T.N. 2011). Four days later, Frank McGuyer paid off the ADA Jane Waters to refile the dismissed criminal assault case. ADA Waters proactively worked with Judge Harris and Krisann Hodges in order to obstruct justice and facilitate an unbelievable amount of abuse of process and malicious prosecution to accomplish immoral ends through any means necessary in a quid pro quo with the wealthy homebuilder, Frank McGuyer. Now Plaintiff Sevier is working with the Department of Justice to ensure that (1) ADA Jane Waters of Texas, (2) Krisann Hodges of Tennessee, and (3) Judge Harris of Texas are disbarred and criminally prosecuted for cause. These four female lawyers intentionally put emotion and greed over logical reasoning and their duty owed to the Constitution under Article VI. The three female lawyers are a seething insult to the rule of law and to all female attorneys who enter the legal profession. These three female lawyers knowingly facilitated the criminal abduction of Plaintiff Sevier's son, Parker Hutson, who resides in Houston simply because they have white hot animus towards Christians, just as the non-secular organizations that are putting on the Drag Queen Story Hour with the Public Library do. The Harris County Family Court allowed Scott Hutson and Brooke McGuyer to surreptitiously adopt the Plaintiff Sevier's son following his unlawful abduction that should have caused Brooke Hutson to be convicted of a felony. This entire unjust circus compelled Plaintiff Sevier to launch an international total war on Human Trafficking and child abduction. See *Sevier v. Google*, 0:15-cv-05345 (6th Cir. 2015); *Sevier v. Apple*, 3:13-0607 (M.D. T.N. 2013); *Sevier v. Herbert*, 2:16-cv-00386 (UT 2016); *Sevier v. Blackberry*, 2:2016-cv-00040 (E.D. T.X. 2016). See humantraffickingpreventionact.com. Parker Hutson is part of a parody family because of moral relativists. Only could something like that happen in Harris County where the Planned Parenthood whistle blowers were prosecuted for reported for the unlawful selling of baby body parts. In Houston, "right" is "wrong" and "wrong" is "right" - see the Library's decision to host the Drag Queen Story Time for children.

he has been encouraged and advised to be responsive to the Constitutional violation on trial here for good cause shown. Plaintiff Sevier works out of the Houston Special Forces of Liberty Office and uses the Library for secular reasons.

17. Rhea Lawson, Ph.D., Executive Director is not sued in her personal capacity. She is sued in her official capacity as the Executive Director of the Library. She has been the Executive Director of the Houston Public Library (HPL) since 2005. The religion clauses of the First Amendment are made applicable to the States by the Fourteenth Amendment. See *Everson v. Bd of Educ.*, 330 U.S. 1, 8, 67 S.Ct. 504, 508, 91 L.Ed 711 (1947) (applying the Establishment Clause to the states); *Cantwell v. Connecticut*, 310 U.S. 296, 303, 60 S.Ct. 900, 903, 84 L.Ed. 1213 (1940) (applying the Free Exercise Clause to the states). The Establishment Clause applies just as equally to Executive Branch expenditures as it does to legislative exercises of the Taxing and Spending Power, to permit Executive Branch use of appropriated funds to accomplish an unconstitutional end would mean that “Establishment Clause protection would melt away.” (Souter, J., dissenting). *Hein v. Freedom From Religion Foundation*, 551 U.S. 587, 640 (2007) (Souter, J., dissenting)

18. Sylvester Turner is the Mayor of Houston Texas. He is the city’s chief executive officer, who sits on the Library’s control board and oversees the Library’s operations. If the Mayor can convince the Plaintiffs and the Court that he is not a necessary party to the litigation, the Plaintiffs will release him from the case.

19. The relief requested in this action is sought against each Defendant, as well as against each Defendant’s officers, employees, and agents, and against all persons acting in cooperation with Defendant(s), under their supervision, at their direction, or under their control. Each of the

Defendants has a duty to uphold the United States Constitution under Article VI have failed to do so.

VI. FACTS

20. The facts in this case are undisputed and matters of public record. This case presents itself as an emergency. Just as the United States District Court for the Western District of Louisiana temporarily enjoined the Library in Houston from hosting the Drag Queen Story Hour, the Plaintiffs ask that the Honorable Court in the Southern District of Texas issue a temporary restraining order.

21. The Houston Public Library is a public facility that is open to the public. The employees of the Houston Public Library are funded with tax dollars. They are city government employees who are part of the executive branch.

22. In early summer of 2018, the Houston Public Library posted the followings on its website:

“Drag Queen Storytime Library: Freed-Montrose Neighborhood Library Date: 8/25/2018, 9/29/2018, 10/27/2018, 12/29/2018 Room: Freed-Montrose Library Meeting Room Time: 2:00PM - 2:45PM Type: Featured Event, Storytimes Age Group: appropriate for all ages. Share this: on facebook and twitter. Break out the dress up chest and let your imagination run wild as you join the Houston Public Library and local Drag Queens for storytime. These vibrant Queens will help to instill a sense of love and acceptance in our children while encouraging them to be true to themselves.”²⁴

23. The Library’s website that promotes Drag Queen Story Time is funded by taxpayer dollars. The employees who oversee the Library’s social media pages are financed with taxpayer dollars.

24. There were many citizens in Texas who are outraged that the Library has hosted and that it continues to host this sham event that has nothing to do with tolerance, diversity, and literacy,

²⁴ <http://houstonlibrary.org/learn-explore/library-events/drag-queen-storytime-7>

but everything to do with sexual grooming and indoctrination with the governments stamp of approval of religious worldview.²⁵

25. Under the direction of the The Heights Branch of the Houston Public Library debuted the Drag Queen Story Time. Local self-identified drag queen, Blackberri, spent an hour reading books to a room full of children. The story time was geared towards children between 18 months old and 10 years old. "It is amazingly unique. That is ultimately something we strive for, for sure. We definitely - at this particular branch but also at Houston Public Library - always want to promote diversity, understanding, inclusion and fun," said Alexandra Drake, assistant manager of the Heights Library. Blackberri is a biological man who dressed like a female. Blackberri's command that the children stand up and "shake their butts" has nothing to do with "literacy" and "diversity." Blackberri constantly and continually used sexual innuendo to expose minors to sexual immorality with the Library's stamp of approval, as a direct result of the Library's refusal to think rationally.

26. On July 20, 2018, community leader, Dr. Steven F. Hotze, launched a petition for the city counsel to shut down the Drag Queen Story Hour.²⁶ The Petition generated by the honorable Dr.

²⁵<https://www.facebook.com/harriscountygop/videos/your-hard-earned-tax-dollars-at-work-drag-queen-storytime/10161141342570112/>

²⁶<https://crtxnews.com/petition-to-the-houston-city-council-stop-drag-queen-storytime-at-the-houston-public-libraries/> Sign the online petition today to the Houston City Council to stop the Drag Queen Storytime at the Houston Public Libraries, www.campaignforhouston.com. The Houston Public Library system, as reported by KHOU Channel 11 News, has initiated a very disturbing program, the Drag Queen Storytime, in local libraries. I believe that we need to teach our children strong, Biblical moral values. Wouldn't you agree? Why should the Houston Public Library be promoting drag queen behavior to young children under 10 years of age? This program has been developed by the LGBTQ political movement with the intention of indoctrinating children into their perverted lifestyle. The drag queen said that he wanted to "break the stigma of drag and queer culture with kids." The purpose is, of course, to normalize this perverted behavior, so that these children can be more easily recruited into the LGBTQ lifestyle. Exposing children to this bizarre sexual behavior is a form of pedophilia. Please sign the online petition today, www.campaignforhouston.com. Then, call your Houston City Council members and tell them to eliminate the Drag Queen Storytime program at the Houston Public Libraries. District A - Brenda Stardig - 832.393.3010 District B - Jerry Davis - 832.393.3009 District C - Ellen Cohen - 832.393.3004 District D - Dwight Boykin - 832.393.3001 District E - Dave Martin - 832.393.3008 District F - Steve Le - 832.393.3002 District G - Greg Travis - 832.393.3007 District H - Karla Cisneros - 832.393.3003 District I - Robert Gallegos - 832.393.3011 District J - Mike Laster - 832.393.3015 District K - Martha Castex-Tatum - 832.393.3016 At Large 1 - Mike Knox - 832.393.3014 At Large 2 - David Robinson - 832.393.3013 At Large 3 - Michael Kubosh - 832.393.3005 At Large 4 - Amanda

Hotze should have caused the city to know that the Drag Queen Story Hour violated community standards of decency.

27. On September 23, the Houston public library hosted Drag Queen Story Hour in partnership with other non-secular organizations at the objection of thousands of taxpayers in the city of Houston to communicate that the Library favored the religion of Secular Humanism over non-religion.²⁷

28. On October 3, 2018, several people gathered outside the Houston Public Library to protest its drag queen storytime event.²⁸ Cesar Franco's statements to the Library and to the media should put the Library on notice that the Drag Queen Story Time violated community standards of decency.

29. While the Library has converted the children's library into a sunday school for the church of Secular Humanism in the effort to sexually groom and prosthelytize minors for the benefit of the cult referred to as the Democrat party, the Library regularly denies Christian groups - including ones that the Plaintiffs are part of - to have Christian related events, even in designated public forums.

30. In response to the opposition to Drag Queen Story Hour, the Houston public library issued a statement

"Throughout their history, American public libraries have been on the front lines of promoting inclusivity and dispelling intolerance. The Houston Public Library is committed to celebrating the diverse and culturally rich communities here in Houston through the broad array of programs

Edwards – 832.393.3012 At Large 5 – Jack Christie – 832.393.3017 Thank you for having the courage of your convictions to stand for Biblical moral values. Committed to our success in this effort, I remain, as always, Sincerely yours, Steven F. Hotze, M.D. President Campaign for Houston www.campaignforhouston.com

²⁷<https://www.houstonchronicle.com/news/texas/article/Houston-Drag-Queen-Story-Hour-featured-at-public-13259069.php>

²⁸ Protesters at the event believed it was a way to "groom children to be acquainted with these issues." "This is an abomination. Children should not be sexualized," said protester Cesar Franco.

<https://abc13.com/society/protesters-gather-during-libraries-drag-queen-story-time-event/4370849/>. The Plaintiffs agree with protester Cesar Franco, who is also a taxpayer in Harris County.

and resources we offer. All our programs are free, open to the public, and accessible by choice.”
29

The published statement was knowingly false. The Library is guilty of narrow broad-mindedness. The Library is completely and totally intolerant of anyone who has the common sense to see that homosexuality is immoral, obscene, subversive to human flourishing and non-secular. The programs hosted by the Library is not free. The Library is using a host of government funded assets to put the religion of Secular Humanism over non-religion. The Library is open to the public. The event is being held in the children’s division of the Library, which is a non-designated public forum and violates the Library’s policies on proselytizing. The reason why the event is being held in the children’s division of the Library is to maximize the indoctrination of children to the Secular Humanism and to normalize false permission giving beliefs about sex.

31. The idea of hosting the Drag Queen Story Hour was the Library’s idea. The Library took the initiative to partner with non-secular groups to put on, endorse, host, and endorse the Drag Queen Story Hour for 2 to 10 year olds in the children division of the public library.

32. The Children’s Library is not a designated meeting place within the library.

33. The Children’s librarian is an authorized agent of the principal librarian Defendant.

34. According to the Library’s public website, the Library itself is running and promoting the Drag Queen Story Hour exhibition in partnership with non-secular organizations.

35. In different Library publications the Library has categorized its plans to sponsor and host the Drag Queen Story Hour with non-secular organizations as a “partnership.” While Drag Queens are not ladies, they are priests of Secular Humanism who are part of an greater church who are

²⁹ <http://www.fox26houston.com/news/the-isiyah-factor/drag-queen-story-hour-in-houston>

on the great commission to use the government to help them recruit and indoctrinate minors to their sexually exploitative religion which is so implausible and irrational that it cannot stand on its own without the government's endorsement.

36. Groups that the Library has partnered with to put on the Drag Queen Story Hour are non-secular organizations run by self-identified homosexuals and self-identified transvestites. Those organizations are full, organized, and has a daily code by which members can live their lives by.

37. The idea that (1) homosexuality is not immoral, that (2) there are more than two genders, that (3) people can be born in the wrong body, that (4) there is a gay gene, that (5) people who do not buy into homosexual orthodoxy are bigots, that (6) homosexuality is not obscene, and that (7) homosexuality is not subversive to human flourishing amount to a series of unproven faith-based assumptions and naked assertions that are implicitly religious and inseparably linked to the religion of Secular Humanism.³⁰

38. Upon information and belief, it was the idea of devout Secular Humanists to recruit self-identified homosexuals to host the Drag Queen Story Hour for children to show that the Library, the State of Texas, and the United States favors the religion of Secular Humanism over non-religion.

³⁰ (DE _ Lisa Boucher ¶¶ 1-10;; DE _ Quinlan ¶¶ 1-37;; DE _ Pastor Cothran ¶¶ 1-50;; DE _ Dr. King ¶¶ 1-20;; DE _ Dr. Cretella ¶¶ 1-20;; DE _ Goodspeed ¶¶ 1-20;; DE _ Grace Harley ¶¶ 1-25;; DE _ Pastor Cuozzo;; ¶¶ 1-21;; DE _ Pastor Farr ¶¶ 1-33;; DE _ Pastor Penkoski ¶¶ 1-34;; DE _ Pastor Cairns ¶¶ 1-30; DE _ Christian Resistance ¶¶ 1-21;; DE _ Special Forces Of Liberty ¶¶ 1-34) See the *amicus* briefs of the National Alliance of Black Pastors; the Center For Garden State Families and Voice Of The Voiceless; Coalition of Doctors Defending Reparative Therapy, and Mass Resistance and American Family Association of PA.

39. Upon information and belief, the Library is not following its own guidelines and policies when it comes to the Drag Queen Story Hour, giving Secular Humanist organizations favorable treatment.³¹

40. The Houston Public Library is associated with the American Library Association, which is just another activist arm of American Civil Liberties Union and Democrat Party. The Houston Public Library has adopted the policy guidelines and ideology of the ALA.³²

41. Upon information and belief, the books that were chosen to be read by biological adult males dressed up as females to children were selected by the Defendants. The books selected amount to propaganda calculated to promote the religion of Secular Humanism, i.e. postmodern western moral relativism and expressive individualism.

42. The book selection was designed to entice 2 to 10 year olds to open the door to buying into a series of unproven faith-based assumptions and naked assertions based on emotion with the goal of making the 2 to 10 to 6 year olds sexually and gender confused in a manner that constitutes government sanctioned child abuse according to Dr. King and Dr. Cretella. (DE __ Dr. King ¶¶ 1-20; DE _ Dr. Cretella ¶¶ 1-20). See *Amicus* of Doctors Defending Reparative Therapy. The Library has failed to live up to its own guidelines because it openly seeks to put the religion of “Secular Humanism over non-religion.”

43. The Houston Public Library is not a church. It is not a redeemer. It cannot be used by devout Secular Humanists to enshrine their religious worldview in the hopes that self-identified

³¹<http://houstonlibrary.org/find-it/meeting-and-rental-spaces/clayton-library-center-genealogical-research-spaces/clayton>. “The meeting rooms in the Houston Public Library (HPL) Clayton Library Center for Genealogical Research (Clayton Library) are available at no charge for use by community groups for informational, educational or cultural meetings and programs when not needed for Library purposes. Use of the meeting room does not constitute Library or City endorsement of the viewpoints, beliefs, ideas or policies expressed by organizations or individuals using the space.”

³² <http://www.ala.org/aboutala/>

homosexuals feel less ashamed and inadequate for putting into practice the irrational secular humanist ideals that they intend to expose children to.

44. The Houston public library is affiliated with the American Library Association which is a Secular Humanist organization that serves as a radical activist arm of the American Civil Liberties Union. The paramount mission of the ACLU and the ALA is to entangle the government with the religion of Secular Humanism, making it the Supreme National religion. The ALA changed the Library's primary mission from "literacy" to "social justice" and "socialism." Socialism is "social injustice." The ALA's policies on "Equity, Diversity & Inclusion" is a euphemism for "we hate Christians" and "we have an emotional problem with absolute objective truth."

45. The ALA's policies amount to a Secular Humanist manifesto that are not secular. For example, section B.3.3 Combating Prejudice, Stereotyping, and Discrimination (Old Number 60.3) of the ALA's policy guidelines states:

The American Library Association actively commits its programs and resources to those efforts that combat prejudice, stereotyping, and discrimination against individuals and groups in the library profession and in library user populations on the basis of race, age, sex, sexual orientation, gender identity, gender expression, creed, color, religious background, national origin, language of origin or disability. Nothing in the Resolution on Prejudice, Stereotyping, and Discrimination authorizes censoring, expurgation, or restrictive labeling of materials. Actions and programs to raise the awareness of library users to any problem or condition would not be in conflict with the Library Bill of Rights when they are free of any element of advocacy. Both documents respect the rights of all who use libraries to do so freely and without being subjected to pressure or censorship from within the institution.³³

46. The "resources" that the Houston Library is "committing" are taxpayer funded. According to the testimony of ex-gays, medical experts, persecuted Christians, and licensed ministers, "Sexual

³³ See ALA Policy Manual Section B, Page 22

orientation, gender identity, and gender expression” are religious mythologies that are no-secular and inseparably linked to the religion of Secular Humanism.³⁴

47. For any government official to equate the “gay civil rights plight” to the “race-based civil rights plight,” whereas the “race-based civil rights plight was actually predicated on immutability and genetics, only to not really mean it is an act of fraud and racial animus in-kind that manages to be racially, sexually, intellectually, spiritually, and emotionally exploitative. Self-identified homosexuals did not have to walk to school, ride on the back of the bus, or drink from a different water fountain because of characteristics that are actually based on immutability. By equating the race-based civil rights plight to the phony gay civil rights plight, the Library is violation of its own policies on racism. See ALA Policy Manual Section B, Page 23. ³⁵

48. Because the Library (1) planned the event, (2) promoted the event, (3) selected the reading material, (4) targeted children, (5) allowed and continues to allow the event to take place in a non-designated public forum, (6) special ordered the books, and (7) refused to allow Mass Resistance to have a follow up Sunday School on the implausibility of transgender ideology and

³⁴ (DE _ Lisa Boucher ¶¶ 1-10;; DE _ Quinlan ¶¶ 1-37;; DE _ Pastor Cothran ¶¶ 1-50;; DE _ Dr. King ¶¶ 1-20;; DE _ Dr. Cretella ¶¶ 1-20;; DE _ Goodspeed ¶¶ 1-20;; DE _ Grace Harley ¶¶ 1-25;; DE _ Pastor Cuzzo; ¶¶ 1-21;; DE _ Pastor Farr ¶¶ 1-33;; DE _ Pastor Penkoski ¶¶ 1-34;; DE _ Pastor Cairns ¶¶ 1-30; DE _ Christian Resistance ¶¶ 1-21;; DE _ Special Forces Of Liberty ¶¶ 1-34) See the *amicus* briefs of the National Alliance of Black Pastors; the Center For Garden State Families and Voice Of The Voiceless; Coalition of Doctors Defending Reparative Therapy, and Mass Resistance and American Family Association of PA.

³⁵ “Furthermore, ALA believes that the struggle against racism, prejudice, stereotyping, and discrimination is a continuous effort and must extend throughout its membership. Specifically, the American Library Association and libraries will: 1. Seek to facilitate equitable participation of all people within decision-making processes in the Association and will strive to create an environment where all are welcome and where diversity is a collective goal. 2. Encourage its membership, libraries, vendors and stakeholders to implement anti-racism policies that outline the organization’s expectations of its participants, staff and members. 3. Support anti-racism work within the broader society by monitoring, evaluating and advocating for human rights and equity legislation, regulations, policy and practice. Thus, the American Library Association will endeavor to ensure full representation of all racial groups and have this reflected in its policies, procedures, and programs, as well as in its relations with staff, members, stakeholders, and the community at large, thereby reaffirming its commitment to diversity, inclusiveness, and mutual respect for all human beings. (See “Policy Reference File” for full Resolution on Prejudice, Stereotyping, and Discrimination, a revision of the Resolution on Racism and Sexism Awareness.)”

Secular Humanism the Library has violated its own policies on “Religion in Libraries.” See ALA Policy Manual Section B, Page 18. B.2.1.26 Religion in Libraries states:

The First Amendment guarantees the right of individuals to believe and practice their religion or to practice no religion at all, and prohibits government from establishing or endorsing a religion or religions. Thus the freedom of, for and from religion, are similarly guaranteed. The First Amendment also guarantees the corollary right of individuals to receive information on religious topics. Libraries support this right by providing access to diverse religious thought without becoming a proponent of any of them. Adopted AC 2016 (See “Policy Reference File”: Religion in American Libraries: An Interpretation of the Library Bill of Rights, 2015-2016 CD #19.9. Adopted June 28, 2016). The reason why the Library is violating its own policies on

The reason why the Library is violating its own policies on Religion in the Libraries is because it favors the religion of Secular Humanism over non-religion.

49. The Drag Queen Story Hour event seeks to seduce minors into cultivating sympathy for or opening the door to adopting the LGBTQ lifestyle through sexually suggestive innuendo embodied in tangible works of art designed to entice children into to subscribing to a worldview on sexuality that “bucks common sense,” erodes community standards of decency, is categorically “sexual immoral” under Tex. Penal Code § 43.24, remains subversive to human flourishing, and is inconsistent with the human design.

50. With the government’s symbolic stamp of approval, the Drag Queen Story Hour amounts to a form of sexual grooming of 2 to 10 year olds by adult males dressed as females in order to increase the chances that the targeted minors will someday molest other members of the same-sex or allow themselves to be molested by members of the same-sex in a manner that can adversely impact the trajectory of their lives and others permanently. The event is not about “diversity,” it is about grooming children for government approved sexual exploitation. The self-identified transvestites and the Librarians are not the parents and guardians of the children who they are targeting under the false guise of “diversity,” “inclusion,” and “tolerance.”

51. The Library's involvement in the event is calculated to give the impression to children, the community, and the Plaintiffs that the government approves of same-sex molestation and the plausibility of Secular Humanism ideology. The clear impression that the Library hopes to give is that Secular Humanism is the favored religion of the Library, the State of Texas, and the United States itself.

52. The decision makers at the Texas public library, like Rhea Lawson, are devout Secular Humanists. They manage to prove not that "times can blind" as Chief Justice Roberts has said, but that a subscription to Secular Humanism and the unexamined assumption of the superiority of our cultural moment that objectively does.

53. Not everyone who works for the Houston Public Library is a Secular Humanist. Upon information and belief, many of the employees at the Houston Public Library have objected and continue to object to the Library's partnership with non-secular organizations and its endorsement of the Drag Queen Story Hour. By filing this lawsuit, the Plaintiffs may be giving voice to them and to thousands of citizens of Texans who want to stop the Library from partnering with non-secular organizations and the Drag Queen Story Hour but do not have the resources or knowledge of the law to do so.

54. Neither the self-identified transvestites or their partners at the Library are the guardians or parents of the targeted children who they invited to attend the obscene exhibition in the children's division for the purpose of indoctrination. The Children's Library is a taxpayer funded facility. The Plaintiffs are taxpayers of Houston, who use the library as a resource to write secular tax legislation crafted to protect children from sexual exploitation and human trafficking and to restore Constitutional order. The Plaintiffs care far too much about the children to

Houston the members of non-secular organizations putting on the event to allow the Library to plunge them into a further state of intellectual darkness due to the Library's refusal to see that LGBTQ ideology is per se religious in nature and that Drag Queen Story Hour exposes minors to sexual immorality in violation of the Texas obscenity codes.

55. The Plaintiffs have a logical nexus to seek an injunction in their taxpayer status capacity to stop the government actors from excessively entangling the government with the religion of Secular Humanism. The Plaintiffs or their members are (1) card carrying members of the Houston public library; they and/or their members are (2) residents of Harris County or they do substantial work there; they are (3) members of the Special Forces Of Liberty or De Facto Attorney Generals, which has a division in Houston. The Plaintiffs pay and will continue to pay taxes of every kind in Harris County. The Plaintiffs and/or their organization have checked out books from the Library, held meetings in the Library, and used the Library for secular purposes to advance tax legislation designed to protect children from sexual exploitation and to restore Constitutional supremacy.

56. Besides demanding that the Library not host the Drag Queen Story Hour and not partner with non-secular organizations, the Plaintiffs requested in the alternative permission to conduct a rebuttal to the Drag Queen Story at the Library that reflected the Christian worldview on the merits of homosexual ideology and the religion of Secular Humanism. The Library denied that request because it favors the religion of Secular Humanism over non-religion.

57. The Plaintiffs have filed in this case sworn testimonies from ex-gays, medical professionals, persecuted Christians, and licensed ministers all of whom have testified under oath that there is no evidence of a gay gene, that the idea that sexual orientation is predicated on immutability is

not proven, and that “sexual orientation” is a mythody, a dogma, and a doctrine that is inseparably linked to the religion of Secular Humanism, i.e. postmodern western individualistic moral relativism.³⁶

58. Before this case was filed, the Library and the city council members were served with petitions and emails by taxpayers demanding that the event be shut down for (1) being non-secular action that was calculated to prosthetize 2 to 10 year olds to the religion of Secular Humanism and for (2) eroding community standards of decency and because it amounts to an obscene exhibition that is injurious to minors in violation of Tex. Penal Code § 43.24.

59. In response to filing a similar lawsuit in Lafayette, Pastor Penkoski received a huge number of threats.³⁷ The Plaintiffs file this case, knowing that they will be harassed, threatened, stalked, libeled, and persecuted by the supporters of the government’s entanglement with the LGBTQ church because the entire endorsement amounts to the greatest non-secular sham since the inception of American Jurisprudence.

60. The government’s endorsement of gay marriage policy, like the Library’s decision to sponsor the Drag Queen Story Hour is a sham. The stated goal of promoting diversity, tolerance, and

³⁶ (DE _ Lisa Boucher ¶¶ 1-10;; DE _ Quinlan ¶¶ 1-37;; DE _ Pastor Cothran ¶¶ 1-50;; DE _ Dr. King ¶¶ 1-20;; DE _ Dr. Cretella ¶¶ 1-20;; DE _ Goodspeed ¶¶ 1-20;; DE _ Grace Harley ¶¶ 1-25;; DE _ Pastor Cuzzo;; ¶¶ 1-21;; DE _ Pastor Farr ¶¶ 1-33;; DE _ Pastor Penkoski ¶¶ 1-34;; DE _ Pastor Cairns ¶¶ 1-30; DE _ Christian Resistance ¶¶ 1-21;; DE _ Special Forces Of Liberty ¶¶ 1-34) See the *amicus* briefs of the National Alliance of Black Pastors; the Center For Garden State Families and Voice Of The Voiceless; Coalition of Doctors Defending Reparative Therapy, and Mass Resistance and American Family Association of PA.

³⁷ 1. Sean Nicholson - ‘Warriors For Christ I’ll sodomize you hateful pricks.’

2. Ashley Lanclos - “Warriors for Christ rapes children”

3. Emma Latta - “you are a mother fuckign bigot,” and “sue me [sic] I’ll find every anti gay tape there is of you and play it in court. Hint up front you will not win. I’ll also claim a first amendment defense.”

4. Stephen Barnhart - “do the world a favor [sic] kill yourself and family the word could use less stupid. Religion and stupid fucks like yourself and followers are whats [sic] wrong with the world. I see you trash.”

5. Timothy Maze - “Warriors For Christ are about to get their asses beat.”

6. Cameryn Yarber - “Warriors For Chris consider this your warning. Love ya!”

7. Hunter Brandon Broussard - “We gonna be throwing hands.”

unity is a total lie. The government's ongoing endorsement of this lie is undermining freedom and harming the Supremacy of the United States Constitution itself.

61. Even when the Plaintiffs are attacked, threatened, harassed, and persecuted by Secular Humanists who want the government to entangle itself with the religion of Secular Humanism, the Plaintiffs would never and have never retaliate against them. As Christians the Plaintiffs are commanded to love their enemies and to treat people who think differently than they do better than themselves. Matthew 5:43-48³⁸ and Philippians 2:3.11.³⁹

62. To say that no one moral doctrine is superior to another and that no one moral doctrine should be used as the basis of law and policy is itself a moral doctrine that asserts itself as the supreme basis for law and policy. To say that there are no absolutes is an absolute. The fact of the matter is that "without faith" there is no basis for "morality," and without "morality" there is no basis for "law."⁴⁰ The Master Narrative of the United States Constitution and the Bill of

³⁸ Matthew 5:43-48: "You have heard that it was said, 'Love your neighbor[a] and hate your enemy.' 44 But I tell you, love your enemies and pray for those who persecute you, 45 that you may be children of your Father in heaven. He causes his sun to rise on the evil and the good, and sends rain on the righteous and the unrighteous. 46 If you love those who love you, what reward will you get? Are not even the tax collectors doing that? 47 And if you greet only your own people, what are you doing more than others? Do not even pagans do that? 48 Be perfect, therefore, as your heavenly Father is perfect.

³⁹ Philippians 2:3. "Don't be selfish; don't try to impress others. Be humble, thinking of others as better than yourselves."

⁴⁰ At some point the Government is going to have to come to terms with the fact that "without faith," there is no basis for "morality," and "without morality" there is no basis for "law" and there is no way around that axiom. Basically, what happened in *Obergefell v. Hodges*, 135 S. Ct. 2584 (2015) was that the self-identified homosexual litigants imperialistically proclaimed that "nobody's version of morality as a basis for law matters except the one we believe in." For moral relativists to suggest that "no one set of moral doctrine as a basis for law matters" is itself a "moral doctrine as a basis for law" that suggests "that it matters above all." Such an assertion is simply an imperialistic power play and a way of coming out on top in a policy debate. In his letters from a Birmingham jail, Dr. King wrote that the reason he knew that a law was unjust was because it violated a "higher law" or a "divine law." Objective morality obviously exists or there is no basis for justice. If a junior officer in the Military is required to disobey orders that are objectively immoral from commanders all the way up to the President under the Uniform Code of Military Justice (UCMJ), then very obviously "morality" as a basis of law matters in the "civil sector" as well, when it comes to policy making. See (UCMJ) 809.ART.90 (20); *Armbruster v. Cavanaugh*, 140 Fed. Appx. 564 (3rd Cir. 2011). In fact, the Constitution's version of (UCMJ) 809.ART.90 (20) is Article VI. The ultimate question presented is which set of moral doctrine can be relied on by Military officers and lawmakers that accords with Constitutional and transcultural justice? The answer is this: "the set of moral doctrine that parallels self-evident truth must be the exclusive foundational basis for law in the United States in promulgation of policy to survive any

Rights are predicated on absolute moral truth claims that accord with self-evident truth. Because LGBTQ ideology is an assault on the absolute truth, it is an absolute assault on the Supremacy of the United States Constitution and the rule of law itself. LGBTQ ideology is by every reasonable definition evil and inconsistent with the way things are and the way we are as humans. The truth claims of Christianity only happen to parallel the self-evident truth that the Constitution and bill of rights are based on even if the evidence does show that the Master Narrative of the Constitution is the Bible. This coincidence does not render the Constitution “unconstitutional” because the United States has never and will never mandate Christianity.

63. The Library’s conduct has been defiant and calculated to send a religious message to minors, the Plaintiffs, and the citizens of Houston.

64. In doing the acts here in complained of, the Defendants, acting individually and/or collectively, and under color of state law, intentionally, willfully and wrongfully deprived the Plaintiffs of rights secured by the Constitution and laws of the United States of America and the State of Texas. vv65. At the time of Defendants' conduct, it was clearly established in law that Defendants could not partner with non-secular organizations to host, display, authorize, permit,

level of Constitutional Scrutiny.” Therefore, “America is [not officially] a Christian Nation” as the Supreme Court conclusively found in *Church of the Holy Trinity v. United States*, 143 U.S. 457 (1892). America is not officially a Christian Nation because it would produce the very legalism that Christ, himself, was so opposed to. However, “America is [certainly not] a [Savage Nation]” even if Justice Kennedy wishes otherwise, since he floated in *Planned Parenthood of Southeastern Pa. v. Casey*, 505 U.S. 833, 84748 (1992) that “at the heart of liberty is the right to define one’s own concept of existence, of meaning, of the universe.” Justice Kennedy’s worldview amounts to the German Proverb, “Jedem das Seine,” which means “to each his own,” which was of course what the sign over Buchenwald concentration camp read. It can be said, however, that “America is [unofficially] a Christian Nation” insofar as laws that based on self-evident truth that happen to parallel the New Testament Gospel does not make those laws automatically invalid in view of the Establishment Clause. The Master narrative of the Constitution and the bill of Rights is unequivocally the personalized and radically transformative truth of the New Testament gospel narrative. Just because the Constitution reflects the truth claims of Christianity does mean that the Constitution is unconstitutional. The moral basis for the Fourteenth Amendment that was the source of the civil rights movement lead by Dr. Martin Luther King Jr comes straight out of genesis that all men are created equal and entitled to equal protection under the law. While the government cannot mandate a national religion, the government can only base laws that reflect self-evident morality from the objective reasonable observer standpoint.

pay-for, sponsor, endorse or acquiesce in the presence of a religious exhibition in the public Library in the state of Texas. Defendants knew or should have known that their conduct was in violation of the Constitution and laws of the United States. The Defendants knew or should have known that the Drag Queen Story Hour involved not only "religious speech," but unprotected obscene speech that is harmful to minors and that violates Tex. Penal Code § 43.24. The fact that the Library was bombarded with emails and with petitioners should have compelled the Library to realize that the event violated community standards of decency and was not age appropriate for minors.

V. CAUSE OF ACTION

65. Plaintiffs re-allege and re-aver all of the allegations contained in the previous paragraphs. 42 U.S.C. § 1983 prohibits Defendants from depriving Plaintiffs of "rights, privileges and immunities secured by the Constitution and laws" of the United States of America.

66. The Establishment Clause of the First Amendment to the United States Constitution provides that a state "shall make no law respecting an establishment of religion." It is made applicable to the Library and municipalities, which derive their authority from the States, through the Fourteenth Amendment.

67. The Establishment Clause of the First Amendment forbids the enactment of any law, program, or practice "respecting an establishment of religion." States are required to pursue a course of neutrality with respect to religion.

68. The Establishment Clause of the United States Constitution was never just designed to prevent government actors from respecting, endorsing, enforcing, and recognizing the edicts of institutionalized religions, like Christianity, Judaism, Islam, Hinduism. The Establishment

Clause of the United States Constitution was also designed, if not more so, to prevent the government from respecting, endorsing, recognizing, and enforcing the ideology of non-institutionalized religions as well. After all, most of the worst atrocities ever recorded since the inception of human history link to putting Secular Humanism orthodoxy into practice. The government of Texas is not a church to be used by devout Secular Humanists to explain away the nature feelings of shame and inadequacy that naturally comes from putting Secular Humanist ideology into practice.

69. All religion amounts to is a set of unproven answers to the greater questions like “why are we here,” “what happens when we die,” and “what should be be doing or not be doing as humans.” The LGBTQ ideology that will be sermonized at the Drag Queen Story Hour attempts to answer those questions in a manner that makes the event a non-secular sham.

70. Instead of having the cross, the 10 commandments, the star and crecent, the LGBTQ church has the gay pride rainbow colored flag and other religious imagery that represents a worldview that is implicitly religious.

71. A reasonable observer looking upon the Drag Queen Story Hour would conclude that the Library favors and endorses the Religion of Secular Humanism over non-religion and to the detriment of other religious beliefs, including Christianity, Judaism, Islam, and Hinduism because (1) Library has acted in “partnership” with non-secular organizations to sponsor the Drag Queen Story Hour, because (2) the Library selected the books for the Drag Queen Story Hour, because (3) the Library took it upon itself to use taxpayer dollars to “special order” the books for the Drag Queen Story Hour, because (4) the event that targets children, because (5) because the event is being held in a non-designated public forum in an effort to indoctrinate

minors in direct violation of litany of the Library's guidelines, because (6) the Drag Queen Story Hour displays men dressed up as women who are seeking to normalize false permission giving beliefs about sex, truth, morality, gender, identity, and marriage through the use of a series of unproven faith-based assumptions and naked assertions that are inseparably linked to the religion of Secular Humanism, and because (7) the Drag Queen Story Hour event has caused the Library to be served with thousands of complaints and/or petitions by parents, asserting that the event is not appropriate for children. A reasonable observer would conclude that Library has violated its own policies under B.2.1.26 Religion in Libraries because it favors the religion of Secular Humanism over non-religion. See ALA Policy Manual Section B, Page 18. By denying Plaintiff Shannon or Pastor Calvin to give a rebuttal to the Drag Queen Storytime or to conduct a Christian Sunday School in the children's Library or to allow adult Christians to meet to discuss Christian views in a public forum, the Library has violated the Plaintiffs' First Amendment rights.

72. There is no secular purpose for the Drag Queen Story Hour, and no reasonable observer could understand it to deliver a secular message. This is specifically why the event targets 2 to 10 year olds, since their notions of right and wrong, real and fake, and secular and non-secular are not fully developed. The Library's conduct is especially egregious because the Library has targeted children, and the speech in question is not only "non-secular," it is "sexually immoral" and violates Tex. Penal Code § 43.24. The Plaintiffs will press for the Librarian to be arrested if the event goes forward.

73. Defendants acquired, designed, installed, maintained, and/or acquiesced in the presence of the Drag Queen Story Hour exhibition with the primary and actual purpose of promoting or

endorsing a particular religion, favoring a particular religious sect, promoting religion over non-religion, compelling or engaging in a religious practice, and/or working deterrence of other religious beliefs, in violation of the Establishment Clause of the United States Constitution.

74. Because the partnership and exhibition is set to be ongoing and routine and because the Library will continue to misuse government asserts to aggressively promoted and prominently displayed the Drag Queen Exhibition inside of the Public Library and in a non-designated public forum in violation of the the Library's own guidelines, a reasonable observer would understand that the Library and the City endorsed and/or approved of the religious message delivered by the exhibition fails the Lemon Test in of the Establishment Clause of the United States Constitution.

75. Plaintiffs and their children have been harmed by Defendants' actions and they will continue to be. The Library continues to promote, endorse, spend money on the Drag Queen Story Hour and it plans to host the event routinely to send the clear message that Secular Humanism is the favored religion of the Library, the city, the State of Texas, and of the United States. The Plaintiffs and their children would come into direct and unwelcome contact with the exhibition and will be offended by it, if the Court does not issue injunctive relief. The Plaintiffs and other non-observers of the Secular Humanism endorsed by the Library will be relegated to second class citizens. The Plaintiffs will be and have been intimidated, and were both afraid and reluctant to voice their objections with respect to this constitutional transgression, fearful of violent retaliation that has been directed their way by a host of phony tolerant LGBTQ activists and Secular Humanists who are immensely dangerous due to the fact that their ideology commands them to not believe in absolute truth.

76. The Library's policy decision to partner with non-secular organizations and the Drag Queen Story Hour amounts to a non-secular sham that endorses non-secular conduct that targets children, while cultivating an indefensible legal weapon against the Plaintiffs who are non-observers of the religion of Secular Humanism and manages to excessively entangle the government with the religion of Secular Humanism.

77. The Library's conduct in this case has caused it to violate all three prongs of the Lemon Test.

VI. DECLARATORY JUDGMENT

78. Plaintiffs re-allege and re-aver all of the allegations contained in the previous paragraphs. Plaintiffs are entitled to declaratory judgment pursuant to 28 U.S.C. § 2201 and in accordance with Federal Rules of Civil Procedure Rule 57, that Defendants' actions are in violation of the Establishment Clause of the First Amendment to the United States Constitution.

VII. INJUNCTIVE RELIEF

79. Plaintiffs re-allege and re-aver all of the allegations contained in the previous paragraphs. Plaintiffs have suffered, and will continue to suffer, immediate and irreparable harm upon each time the Defendants are allowed to pay-for, promote, authorize, permit, condone, maintain, acquiesce, endorse, sponsor, display, and advertise the Drag Queen Story Hour for 2 to 10 year olds in partnership with non-secular organizations on public property that is accessible to the general public.

80. Accordingly, temporary, preliminary, and permanent injunctive relief is hereby requested pursuant to Federal Rules of Civil Procedure, Rule 65.

VIII. DAMAGES

81. Plaintiffs re-allegeand re-aver all of the allegations contained in the previous paragraphs. As a result of the Defendants' violations of the Plaintiffs' constitutional rights, the Plaintiffs have suffered, or shall suffer, damages, including mental anguish and emotional distress.

82. In the alternative, Plaintiffs request nominal damages for the violation of their constitutional rights.

IX. ATTORNEY'S FEES

83. Plaintiffs re-allegeand re-aver all of the allegations contained in the previous paragraphs. Plaintiffs request, and are entitled to an award of attorney fees and costs.

X. RELIEF

84. Plaintiffs re-allegeand re-aver all of the allegations contained in the previous paragraphs.

WHEREFORE,

1. Plaintiffs pray that Defendants be duly cited to appear and answer this Complaint; that they be served with a copy of the complaint and that after all legal delays have expired and due proceedings be had, there be judgment in favor of the Plaintiffs, and against the Defendants, for temporary, preliminary, and permanent injunctive and declaratory relief, all damages, attorney's fees and costs of these proceedings, together with interest and all legal and equitable relief.


2. That Plaintiff Sevier be granted ECF filing access in this case.

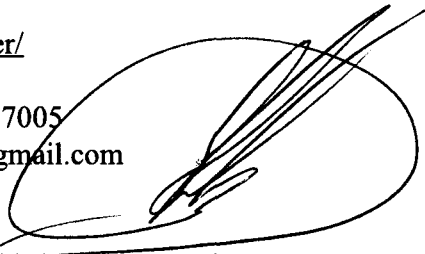
3. That Attorney Jason Rowe Esq. be granted leave to appear on behalf of the non-attorney plaintiffs after he completes the CLE and pays the admission fee;


4. That Attorney Eric Dick Esq. be allowed to appear in due course on behalf of the non-attorney plaintiffs;


4. That the Court allow any interested party for either side to file *amicus* briefs, if they can demonstrate an interest in the outcome of the case.
5. That the Court grant any other equitable relief and costs.

Respectfully submitted:


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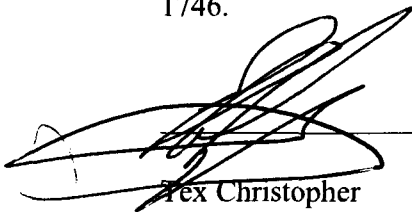

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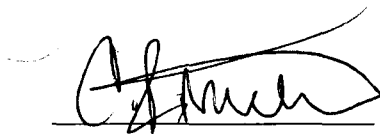
(Appearance by third party counsel pending)

Verification

We, Tex Christopher, Pastor Calvin Miller, and Chris Sevier, the Plaintiffs in this action, have read the facts contained in the complaint and affirm that they are true to the best of their information and belief. This beliefs are made pursuant to penalty of perjury under 28 USC sec. 1746.

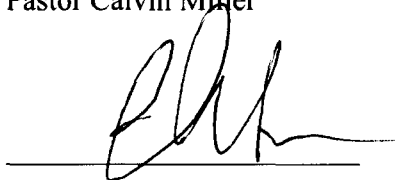


Tex Christopher



Pastor Calvin Miller

Pastor Calvin Miller



Chris Sevier Esq.

Chris Sevier Esq.



Tracy Shannon

Tracy Shannon