

1 Renae Ferguson
C/O Americas Freedom Foundation
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5 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
6 **LOS ANGELES COUNTY**
7 **SAN FERNANDO DISTRICT**

8 **PEOPLE OF THE STATE OF**
9 **CALIFORNIA**

10 **PLAINTIFF**

11 **V**

12 **RENAE FERGUSON**

13 **DEFENDANT**

14 **In Pro Se**

) **CA # PAO36550**

) **NOTICE OF EMERGENCY**
) **MOTIONS AND MOTIONS FOR**

) **1. QUASH INFORMATION ON**
) **GROUND THAT IT WAS**
) **BASED ON PERJURY By**
) **LAPD**

) **2. Temporary Restraining Order**
) **and Preliminary injunction**
) **Conspiracy to violate 1st**
) **Amendment and other rights**
) **under color of law.**

) **Retaliation for seeking judicial**
) **protection, and to seek**
) **release from civil rights**
) **Damage suits.**

) **Date June 7, 2002**

) **Time 1:30**

) **Place Court Room #141**

) **Est. Time 8 hours**

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23 **MEMORANDUM IN SUPPORT OF EMERGENCY**
24 **EX PARTE MOTION TO QUASH INFORMATION**
25 **AND FOR A TRO AND PRELIMINARY INJUNCTION**

26 **FACTS**

27 **At some unknown point beginning in 1994, the Ventura county District Attorney**
28 **Michael Bradbury entered into a criminal conspiracy with the Private Ventura County**

1 Humane Society to use the power of his office to steal private property (animals) from
2 citizen by fabricating complaints of animal abuse.

3 The Humane Society benefitted from this business arraignment by obtaining the full
4 power of the police, the power of the District Attorney's Office, and the Courts, and by
5 criminal prosecution or threats of same to obtained forced guilty pleas, obtaining illegal
6 convictions.

7 Through this manner, the humane society obtained money from the state for the
8 care of the evidence (animals), court ordered restitution of money for care of the animals
9 they stole without court order or by lying to the court to obtain same and through the
10 publicity generated for fund raising.

11 Bradbury benefitted from the free publicity for his reelection and possible campaign
12 contributions from animal activists [this lying to get search warrants has been admitted
13 in deposition in an unrelated Civil Rights Damage Suit in this District Court, and further
14 supported by a settlement agreement by the Ventura County Humane Society for
15 violation of the law and individual's civil rights.

16 While Ventura County District Attorney Bradbury was a co-conspirator, he was not
17 named as a defendant in that Civil Rights Damage Suit.

18 In 1995 this predatory agency made Ms. Ferguson and her Tiny Tots Riding School
19 their target for destruction, their first overt illegal act was to attempt to destroy her first
20 amendment protected riding school by trying to get the City of Ventura to cancel her
21 riding school contract. When this was unsuccessful, they devised a scheme to steal two
22 old horses from her riding school, one which they knew she had just received, purchase
23 sight unseen and the second our family horse Lady Legs, who had been in our care and
24]custody for over twenty years, living to be a ripe old age of thirty-two years old.

25 Lady Legs, which defendant knew to be skinny because she was old, was still in
26 good enough shape to win a ribbon at a horse show before professional judges only a
27 few weeks before she was stolen by The Humane Society.
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1 The Humane Society, without a court order, was trespassing on private riding stables,
2 property that at this time was closed to the public, who stole two of the eight horses, one
3 of which was Lady Legs, our thirty-three year old family horse, and after this stealing of
4 property that did not belong to them, they immediately contacted again the City of
5 Ventura Parks and Relations Department and got them to cancel her Tiny Tots Riding
6 School Program, and had defendant, Ventura Star News, run pictures of these horses
7 that plaintiff feels to be doctored and after the Humane Society drugged said horses in a
8 further act to destroy her school and two months later said Humane Society had this
9 same paper run addition pictures, alleging that Lady Legs had gained three hundred
10 pounds in their care and custody, when if fact, at this point they had killed Lady Legs,
11 after causing her to get sick with the colic after being their control for only six weeks.

12 This act of destruction of evidence without a court order was kept secret for almost
13 nine months when a confidential informant disclosed to plaintiff that Lady Legs had been
14 killed by the Humane Society.

15 Plaintiff and his daughter prepared and filed a Civil Rights Damage Suit in the
16 Superior Court in Ventura County, and later in Federal Court. When Bradbury learned of
17 this suit, he filed charges against Ms. Ferguson, he obtained this confidential information
18 from Ms. Ferguson's ex-husband who was his agent.

19 Over the proceeding years, defendant Lance Ferguson became stalking horse for
20 Michael Bradbury, involving in a non-stop effort to disrupt and destroy Ms. Ferguson's
21 riding profession and the riding school she worked for West Coast Riding Academy Inc.,
22 a non-profit religious ministry, and while Bradbury and his staff kept up their illegal and
23 extra legal effort to destroy Ms. Ferguson.

24 In the process of protecting her rights, Ms. Ferguson was forced to depend on State
25 Bar Licensed Lawyers, acting as defense attorneys, and on judges to protect her rights.
26 However, her defense attorney kept refusing to protect her rights, even after plaintiff
27 provided them with laws and evidence, for example when plaintiff and Ms. Ferguson
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1 caught defendant, Ventura County Deputy District Attorney, Richard Simon attempting
2 to get one of Ms. Ferguson's students to commit perjury in the court room, while the
3 court was in session.

4 Plaintiff and Ms. Ferguson informed her attorney Mr. Dunn of this and instructed
5 him to immediately inform the judge of the attempt to obstruct justice and to suborn
6 perjury. Mr. Dunn refused, stating that the District Attorney Michael Bradbury and his
7 staff do this all the time.

8 Ms. Ferguson's lawyers have all wilfully refused to get a deposition form this
9 witness, or investigate this matter which discredits the witness and prosecutors in this
10 case. In fact, It was plaintiff Edward Reddeck, and not the lawyers, who after obtaining
11 copies of some of the discovery, in one day of research discovered, the Neo Cropsy of
12 Lady Legs, conducted after the Humane Society killed her. This animal autopsy found
13 that Lady Legs was not being abused, she was skinny because she was old and had
14 made no mean full weight gain in the custody of the Humane Society as they had falsely
15 claimed to newspaper and in court.

16 Defendant Bradbury continued to harass Ms. Ferguson, disrupt her riding school,
17 forcing her to move to Los Angeles, it was here again Bradbury compounded this
18 conspiracy by causing yet further attacks against Ms. Ferguson, her riding school
19 program, and her family members.

20 In the furtherance of this conspiracy, Bradbury, through his agents including
21 defendant Cathleen Doyle, attacked Ms. Ferguson and West Coast Riding Academy Inc.
22 in Los Angeles for full details of this case. see the accompanying summons and
23 complaint.

24 In the further act of compounding this conspiracy, the City of Los Angeles, the Los
25 Angeles Attorney, Animal Control, and the Los Angeles Police Department of the
26 rampart scandal fame, conspired to file false charges against Dr. Reddeck and
27 America's Freedom Foundation for animal abuse, when at all times they knew he had no
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1 possession or control over the horses in question, nor West Coast Riding Academy Inc.

2 Defendant was charged in an illegal complaint which contained no statement of
3 the probable cause that a crime had ever been committed, was arrested and placed in
4 jail in violation of California State Law, and placed on bond, when this also is forbidden
5 by state laws in misdemeanor cases, denied her right to a speedy trial, and all other
6 constitutional defense, including witness in his defense.

7 Before sentencing, Ms. Ferguson made a motion for new trial based on newly
8 discovered evidence of her innocence. The city attorney, withholding of Brady material,
9 judicial and prosecutorial misconduct. This evidence is in the record.

10 Recently in furtherance of this conspiracy, the L.A. Police Department, who are
11 engaging further rampart type misconduct and coverup, who conspired with Dole to
12 steal the horses over two years later, filed a criminal complaint against Ms. Ferguson,
13 refilling the same allegation used at trial in West L.A. to obtain the false and perjured
14 conviction of Ms. Craig and Ms. Ferguson.

15 In this case, as we have also seen in the L.A. Police Department's ramparts
16 scandal, that it is a custom for certain police officers to steal property and evidence and
17 give or sell it to their friends, as they did in this case.

18 The information in this case was obtained by the Los Angeles police based on perjury
19 as at all times they knew that West Coast Riding Academy was a lawful Non Profit riding
20 school and had for years offered lessons for children and was offering lessons for
21 disadvantaged kids at the Dematos stables, which were obstructed by the government
22 through their agents including animal control Dematos, Doyal and others which actions
23 were designed to destroy West Coast Riding for Ventura County District Attorney Bradbury
24 and co conspirators

25 Ms Ferguson has been constantly denied due process and equal protection, By
26 government lawyers, and police who lie about facts, about law engage in All manner of
27 criminal acts and hide their crimes and suppress discovery. Judges Compound this
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1 conspiracy by acting as agents of the prosecution, by allowing them to obstruct justice
2 with impunity, make rulings that are in violation of the constitution, law of the case and
3 their own rules.

4 The defense bar as a group will steal 10 upon 10 of thousands of dollars as they have
5 done in Ms Ferguson case, and incalculable billions of dollars from the public as a whole
6 and will fall on their sword for the government rather than make a full defense of their
7 client especially when it comes to exposing government corruption and abuse of power.

8 This corruption and racketeering enterprise is not limited to ms Ferguson however
9 she is a text book example of this corruption. It is a clear and present danger to the
10 lives, liberty and property of everyone in this state. An their exposure to the terrorist acts
11 by the government. Who are acting under cover of law and government authority.

12 The records shows that in Ms Ferguson case her paid as well as court appointed
13 lawyers not only refused to follow legal defense requirements that a first year law
14 students knows how to make, refused to investigate the case, or to obtain discovery.

15 They further lie to their clients and refuse to file or ligate motions that have been
16 prepared that are equal or superior in quality than those prepared by the most expensive
17 law firms. The unwritten rule is no money no defense, little money, a little justice Lots of
18 money lots of Justice, Unlimited money Get away with murder.

19
20 **TEMPORARY RESTRAINING ORDER REQUIRED**

21 Plaintiff is suffering from immediate and irreparable injury, loss and damage, as
22 his first amendment rights to redress government, to freedom of speech , press, religion,
23 and to association has and is now being violated.

24 The defendants have violated and conspired to violate the above stated rights,
25 have filed fabricated criminal charges against plaintiff, with know perjured allegations,
26 have further harassed and arrested defendant to prevent her from filing law suit in the
27 first instance, and holding over her head the fear of additional retaliation against plaintiff
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1 to delay the filing of this complaint permanently or until the statute of limitation has
2 expired.

3 As the result of the above stated evil, some of plaintiff's family members are
4 afraid to associate with other family members out of fear that they will be falsely arrested
5 and charged only because of their association.

6 Therefore, plaintiff is suffering a prior restraint and permanent chill on each of his
7 rights protected by the first amendment of the U.S. Constitution.

8 The question is how many more **thousands or tenths of thousands** of lives will
9 be destroyed by defendants before their evil is checked and before its too late for any
10 members of the judiciary to restore the integrity of our legal system.

11 CONTROLLING LAW INJUNCTIVE RELIEF

12 1. The U.S. Supreme Court, in Haines v. Kerner, 519 LeD 652, ruled that pro
13 se litigants are (not) to be held to the standing of a practicing attorney. That the court is
14 to determine what relief petitioner is attempting to obtain and give it to her even if not
15 stated clearly in her moving papers.

16 2. **The law controlling this case is crystal clear. That a prior restraint on**
17 **First Amendment Rights even for a moment is irreparable harm.**

18 THE GOVERNMENT IS EXCLUDED IN AREAS OF RELIGION

19 3. The U.S. Supreme Court has ruled in Lemon v. Kurtzman 403 U.S. 602,
20 91, 29 LED 2D 745, that the government is to be entirely excluded from areas of
21 religion.

22 SPEAKERS MUST BE ABLE TO SPEAK WITH SECURITY

23 4. That speakers cannot be made to wait for years for Judicial determination of
24 standards under a statute before speakers are able to speak with a measure of
25 [security], Riley v. National Federation of Blind, 487, U.S. 781.

26 CRIMINAL PROSECUTION BARED

27 5. In Bantam Books v. Sullivan 372 U.S. 58, the U.S. Supreme Court held that
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1 the first amendment bars a criminal prosecution if motivated by the improper purpose of
2 interfering with defendant's First Amendment Rights.

3 ABSOLUTELY NO PRIOR JUDICIAL RESTRAINTS

4 6. The First Amendment tolerates absolutely no prior judicial restraints on First
5 amendment rights, New York Times v. U.S. 29 LED 2d 882

6 EVEN MINIMAL PRIOR RESTRAINTS CONSTITUTES IRREPARABLE HARM

7 7. The U.S. Supreme Court held that the deprivation of rights guaranteed by
8 the U.S. Constitution for even minimal periods constitutes irreparable injury in the
9 context for injunctive relief, see Austin v. Keefe 29 led 2D.

10 8. The court held in Natch Theaters Inc. v. Rather 473 Spp. 1125 (1979),
11 where the acts by the government involves a deprivation of plaintiff and the public's first
12 amendment rights constitutes irreparable injury, requiring injunctive relief, because
13 there is no means to make up for the irretrievable loss, of that which would have been
14 expressed and causes irreparable injury both economically and personally. The U.S.
15 Supreme Court has ruled over and over again that [the loss of First Amendment
16 Freedoms for even minimal periods of time unquestionably constitutes irreparable
17 cradle.] cradling

18 9. The First Amendment is as close to an absolute as we have in our
19 jurisprudence as in a Constitution, for a free people. There can no doubt that the liberty
20 must be broad indeed. See Bonding v. Sharpe 98 Led 884, U.S. v. U.S. District Court
21 for the Central District of California 858 F2D 534 (9th Cir 1988) the First Amendment
22 does not permit the imposition of criminal sanctions, where doing so would chill
23 protected speech, also see Smith v. California 4 Led 2D 205.

24 INTERFERENCE WITH RIGHTS OF ACCESS TO THE COURT

25 IS OBSTRUCTION OF JUSTICE

26 10. Interference with right of access to the courts constitutes a conspiracy to
27 obstruct justice, Ryland v. Shapiro 708 F2d 967 (1983).

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1 PROSECUTOR'S POWERS MAY NOT BE USED TO
2 OBSTRUCT CIVIL RIGHTS CLAIMS

3 11. The government prosecutorial power may not be used to exact release of
4 related civil rights claims Dixon v. D.C. 394 F. 2D 966, also see McDonald v. Music 425
5 F2D 373 (9th Cir 1970). Boyd v. Adams 513 F2D 83 (7th Cir 1975).
6

7 MANDATORY INJUNCTION REQUIRED
8 TO PROTECT LITIGANTS AND WITNESSES
9 IN FEDERAL COURT

10 12. The retaliation against witnesses and litigants in our courts is that the insult
11 that such retaliation against litigants or witnesses would produce goes beyond the
12 injuries suffered by the individuals themselves. The integrity of the courts process
13 suffers inevitable destruction. Johnson v. Interstate Power Company 187 F Sup 361
14 (1960), Bell v. Hood 90 Led 939 1446, U.S. v. Farrar 414 F2D 936, 938 5th Cir.

15 THE COURTS CAN ORDER DEFENDANTS TO PROVIDE
16 PLAINTIFF WITH MONEY TO OBTAIN JUSTICE

17 13. **The Courts have the authority to order defendant to spend the**
18 **necessary funds for equitable relief in the face of irreparable damages to plaintiff**
19 **to restore the status Quo, EEC v. Locals 14 & 15 Intern. U of Open. Eng. 438 F**
20 **Spp. 875.**

21
22 PRAYER FOR RELIEF

23 Whereas there is an incurable chill and prior restraint on defendants first
24 amendment and other rights. Therefore, plaintiff moves this honorable court for the
25 following relief:

26 1. **That the court issue a temporary restraining order and interlocutory**
27 **injunction that defendant be enjoined from any further prosecution or legal action**
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1 **against Ms. Ferguson or other family member.**

2 **2. That this court immediate Quash the warrant for Ms Ferguson arrest**
3 **Ms. Ferguson or place her on her on her own recognizance, until this case can be**
4 **heard so as to remove this prior restraint in plaintiff's first and other rights**
5 **amendment rights.**

6 3. That the city of Los Angeles Animal Control and L.A. City Police Department
7 be ordered to return all the property of West Coast Riding Academy Inc., including all
8 horses they have stolen and given to their friends so that the riding school can resume
9 its ministry and mission.

10 4. That the government be further enjoined from any additional attacks against
11 Defendant using the legal system, and further, they be enjoined form surveillance of the
12 plaintiff, taping her phones, intercepting her mail , using friends, associates, clients or
13 other to spy on her or plant evidence as is their custom, or any other similar conduct.

14 5. That the court issue a blanket restraining order and an injunction protection
15 to defendant from any harm from any state or federal agency or their agents for the
16 duration of this case to protect defendant as well as the integrity of the court's process.

17 **6. That the information be quashed on the grounds that no crime took**
18 **place and that the LAPD Knowingly obtained this information by perjury**

19 7. That the government be required to pay defendant moneys for equitable
20 relief, to have the resources necessary to hire competent loyal counsel to litigate her
21 justice cause, which goes to the protection of the governing rules of our nation and the
22 constitutional protection of we the people.

23 OR IN THE ALTERNATIVE

24
25 8. That this injunction be kept in place, so that the court truth seeking
26 process be protected and until the people's reservoir of justice can be completely
27 purified and protected as this corruption is a clear and present danger to the lives liberty
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1 and property of all the people in California..

2 When the government makes a factual inquiry they will find the facts in this brief
3 are indisputable, plaintiff therefore makes a standing motion for **contempt of court** for
4 sanction including disbarment of any of government , attorneys, defendants, or witness
5 who denies the truth of the facts in this brief or who use legal technicalities to harass or
6 to cause unnecessary delay or to needless increase the cost of ligation ,or obstruct
7 defendants liberty

8 **Any acts or omissions by anyone to obstruct the truth from coming out into**
9 **this case will also be a compounding of this conspiracy to obstruct justice.**

10 9. Thus further and all other relief that is allowed by law justice equity and the
11 ruling of this honorable court.

12 I certify that the foregoing is true and accurate to the best of my knowledge
13 executed this May 30, 2002

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16 Dated May 30, 2002

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Renaee Ferguson

IN Pro SE

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Proof of Service

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24

25 I here by certify that i have served a copy of the forgoing motion on The district
26 attorney by mailing a copy to him at the San Fernando courthouse 900 Third st, Fourth
27 Floor, San Fernando Ca 91340 By first class U.S. mail.

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June 1, 2002

Maria Compos