

Tinika Warren

Attorney for Plaintiffs

Pro Se

US COURT OF APPEALS

NORTHERN DISTRICT OF GEORGIA

Tinika S. Warren, Pro Se

Plaintiffs,

v.

AT&T, INC., AT&T SERVICES,
INC , AT&T MOBILITY
CORPORATION (DE), investors
and affiliates marking affiliates
BadBoy Records, Sony Music
Entertainment, Epic Records, TRU
Foundation, Inc., Warner Music
Group Inc, WMG, Warrick Dunn
Charities, Aaron Rents, Inc, United
Way of Metro Atlanta, State of
Georgia Department of Health &
Human Services, Children's
Healthcare of Atlanta Georgia,
Emory University Hospital, Mc
Donalds, Inc, Conduit Global,
Charter Communications, Inc.,
Vanessa Harrison, Debra Simpson
Fyer, Tauheed Epps (aka) 2
Chainz, Nayvadius DeMun Wilburn
(aka) Future

Defendants.

Eleventh Circuit U.S. Court of Appeals

Case #:

0:20-prici-13233

Type

private civil / federal question

Nature of Suit

362 Torts - Personal Injury -
Medical Malpractice

I. NATURE OF THE CASE

1. Plaintiffs Tinika S. Warren bring this action individually and on behalf of herself and household member. These plaintiffs residing in the jurisdiction of City and Atlanta and County of Fulton Northern District Court of Atlanta, Georgia, (collectively referred to as "Plaintiffs") bring this action against Defendants AT&T, INC., AT&T SERVICES, INC, TRU Foundation, Inc. (hereinafter referred to collectively as "Defendants," or individually by their respective acronyms). Whose REGISTERED AGENT INFORMATION, Registered Agent Name C T Corporation System, Physical Address: 289 S Culver St, Lawrenceville, GA, 30046-4805, USA County: Gwinnett. This complaint seeks equitable, lost wages, back pay compensation, pay the defendants to pay future medical bills, dividends, with interest, for injuries and using my work name in the adult entertainment industry, protection, and injunctive relief for the use of breach of peace with the production of real-time footages, media stories related to my cases by means of malice and intentional torts resulting in the "parental alienation", loss of work and play, rest and activity, etc. preventing my ability bounce back from adversity and discrimination. This complaint additionally seeks damages for strict product liability and failure to adopt and follow the rules of this country under the FCC, FTC guidelines and Georgia Laws causing a hostile environment for me and my child. Finally, this complaint seeks treble and punitive damages for practices of dishonesty, distrust, and unethical standards in telecommunications within the industry, by fraud and conspiracy in violation of the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. (sec) 1962 for Defendants' collective and organized concealment of dividends, compensation, gangs, a form of recruiting gangs, gangs working for the businesses, recruiting human trafficking, sex trafficking, promoting drugs and prostitution, kidnapping by using my stage names " Chocolate and Exotic ", causing negative influence in the community and negative

impact on my children lives through poor leadership and music. I elevated from the club industry in 2005 and have not gone back to work in the industry. This can cause mental impact not only me but my children and their confidence in me and themselves. I would love to clean up the community to stand up because I have a reason for the foundation to serve as a leader by showing that this activity will not be allowed in the community. These people are a public nuisance and affecting me maintaining fulfilling relationships, friendships, family communication and technical difficulties with all my devices and social media accounts as a role model within the community and as a college student.

II. JURISDICTION and PARTIES

2. Defendants AT&T, INC. and AT&T SERVICES, INC., with principal places of business in Atlanta, Georgia. AT&T, INC. and AT&T SERVICES, INC. is the largest telecommunications company and has local chapters in Atlanta, Georgia, Address: 1025 Lenox Park Blvd NE, Atlanta, GA 30319, 2200 Pinemont Road, Greensboro, North Carolina, Texas located at 208 S. Akard St., Dallas, TX, 75202. and directs the actions of AT&T, INC. and AT&T SERVICES, INC. Plaintiffs, Tinika Se'Cal Warren, are residents of Locust Grove, Georgia, and her household members, on whose behalf they are suing, was also a Georgia resident. All events giving rise to this incident took place in North Carolina, Greensboro, Mc Cleansville, Winston Salem, Avondale Estates, Georgia Decatur, and Locust Grove, Georgia. I had immunity during this time due to reporting retaliation, intimidation, and harassment while exercising our fair housing rights, educational rights, USDA rights, discrimination, 504 disabilities rights, Healthcare Rights, SSI, SSDI rights, security breaches, audit and compliance

failures in cases 1:17-cv-04187, (1:19-cv-00545), 1:16cv1401, 1:18-cv-02043, 1:18-cv-04088, 1:18-cv-05299. Therefore, the jurisdiction of this court is proper.

III. FACTUAL ALLEGATIONS

3. Defendant AT&T, INC. and AT&T SERVICES, INC, investors and affiliates marking affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds, Inc, Conduit Global, Charter Communications, Inc., Vanessa Harrison, Debra Simpson Fyer, Tauheed Epps (aka) 2 Chainz, Nayvadius DeMun Wilburn (aka) Future harmed my work ethics, dedication to the community, threatening to destroy my reputation.

4. The historical brands of AT&T, Bell South

In 1876, Alexander Graham Bell invented the telephone. That was the foundation of the company that would become AT&T - a brand that is now synonymous with innovation in communications.

In 1984, the former AT&T agreed to divest its local telephone operations but retain its long-distance, R&D and manufacturing arms. From this, SBC Communications Inc. (first known as Southwestern Bell Corp.) was born.

Twelve years later, the Telecommunications Act of 1996 drove major changes in the competitive landscape. SBC expanded its U.S. presence through a series of acquisitions, including Pacific Telesis Group (1997) and Ameritech Corp. (1999). In 2005, SBC acquired AT&T Corp, creating the new AT&T, a leader in global communications for businesses.

The acquisition of BellSouth in 2006 consolidated ownership of Cingular Wireless. And AT&T led one of the most significant transformations in communications since the invention of the telephone ... the birth of the mobile Internet.

In 2013, the company bought Cricket to give its customers prepaid market more access to mobile Internet services. I worked personally for Infonxx, a telecommunications company receiving 800 inbound calls daily from 2000- 2003 and settled out of court in a sexual harassment lawsuit. The future has the company address on a house in his video. This company may have hired these people to stalk me dated all the way back to 2004. Later in 2015, the company completed a purchase of 2 Mexican wireless companies, lusacell and Nextel Mexico. They have adopted the smartphone that made them leading wireless provider in that country, and I worked for a third party affiliate of this parent company named InfoNXX technology (call center), Conduit Global Technology Call Center, InfoNxx was ordered by the North Carolina Secretary of State not to conduct "any more business" under the name InfoNxx and I started working for Conduit Global in May 2016 and set up direct deposit for my paychecks and the company was "conducting banking business" under the name that they were Banned from using again by the State of North Carolina. The company now holds acquisition of DIRECTV, in which I was a customer of DirectTV and there is no telling what other practices of stalking and

increased cost in billing statements while living and residing at 7580 Clear Creek Drive, Lithonia, Georgia. The company making them the world's biggest paid TV provider generating the revenue of \$287.6 billion dollars, <https://www.nasdaq.com/market-activity/stocks/t>, this is another reason why I should have been granted a " protection order" and safe affordable housing.

This rich history over these years of stalking me using media do not support their ongoing mission: Connect people with their world, everywhere they live, work and play ... and do it better than anyone else.

They are not standing by that " Mission Statement" by failing to protect and failing to apply due diligence impacting critical impacts on me and my household by failing to uplift us leaving me to hang on for dear life with worry and fear. Making my final destination a Hotel at Sundown Lodge under illegal duress in the privacy of my room by means of illegal sneak peeks. I feel so stressed and violated by their observance belittling me and violating me this conduct violates the Americans with Disabilities Act (ADA). The EEOC filed suit (EEOC v. Massey Services, Inc., Civil Action No. 2:19-cv-00263) in U.S. District Court for the District of South Carolina, Charleston Division after first attempting to reach a pre-litigation settlement through its conciliation process.

See, SAN JOSE, Calif. - Carmel restaurants owned and operated by JCFCB, Inc. agreed to pay \$175,000 to settle a federal sexual harassment lawsuit filed on behalf of male and female kitchen staff, the U.S. Equal Employment Opportunity Commission (EEOC) announced today. <https://www.eeoc.gov/eeoc/newsroom/release/1-9-20b.cfm>

According to the EEOC's lawsuit, a male line cook at Porta Bella Restaurant suffered repeated inappropriate grabbing of his private parts by the kitchen manager, cook, and chef. When he reported the conduct to Porta Bella's owners, they dismissed the behavior and said, "They only play." Afterward, the chef became confrontational, and yelled and hit the line cook, forcing him to quit. The EEOC alleged JCFB failed to adequately investigate or discipline the harassers.

The EEOC also sued on behalf of a female dishwasher employed at Mediterranean Restaurant who endured daily sexual comments and occasional unwanted physical touching by the same kitchen manager that harassed the Porta Bella line cook. Although she informed another manager of the harassment, the sexual comments continued.

Similar impacts include such conduct that violates Title VII of the Civil Rights Act of 1964 which prohibits sexual harassment in the workplace. The EEOC filed its lawsuit (EEOC v. JCFB, Inc., Case No. 5:19-CV-0052) in the U.S. District Court for the Northern District of California, San Jose Division, after first attempting to reach a pre-litigation settlement through its voluntary conciliation process.

The three-year consent decree orders JCFB to pay \$175,000 to the two former employees and requires the company to provide anti-harassment training to all employees at both restaurants. In addition, JCFB will hire an external consultant to monitor and investigate any future reports of a hostile work environment.

EEOC San Jose Local Office Director Rosa Salazar said, "We are pleased JCFB will institute effective HR practices for training, investigating and, where appropriate, disciplining its staff to curb harassment at its restaurants." She said combating workplace harassment is a top priority of the EEOC's 2017-2021 Strategic Enforcement Plan.

EEOC San Francisco Senior Trial Attorney Raymond Cheung said, "No matter whether the unwelcome conduct is verbal or physical and reported by a male or female employee, employers must take charges of harassment seriously. This case demonstrates the EEOC's commitment to ensure vulnerable workers in the service industries are protected from a hostile work environment."

5. This element, proves facts, that for the past years, I have been getting exposed to hostile living conditions and working conditions although I have all the required elements to perfections to make me good at my career in technology and I have extremely high standards and with results, my background will reflect my history of determination and success starting with James Madison High School, of Norcross Georgia, in 2000, Lincoln Technical College for Medical Assistant in 2004, Nail Tech School graduate in 2009, then later gathering more education at DeVry University, with a Bachelors' Degree in Technical Management, while residing in the State of Georgia. The people at this company knows nothing about me and my current life and that is why they wanted revenge to spy on me for filing previous complaints with HUD, the EEOC

6. This element proves facts that the Defendant AT&T, INC. and AT&T SERVICES, INC is a telecommunications company that uses AT&T, INC. and AT&T SERVICES, INC, affiliates cable and local networks. As part of its contract with AT&T, INC. and AT&T SERVICES, INC, BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc employer that had to pay me unemployment, United Way of Metro Atlanta former employer that had to pay me unemployed for firing me, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia (where my sister is an employee) and my daughter is a patient, Emory University Hospital, Mc Donald s, Inc my current employer who is participating in the intimidation and threats and retaliation I need you to force witnesses and video appear in this court, Conduit Global (former employer that had to pay me unemployment and settle out of court for my injuries, Charter Communications, Inc.

7. As a result of Defendants' AT&T, INC. and AT&T SERVICES, INC, BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds, Inc, Conduit Global, Charter Communications, Inc. collective actions and community as a whole has been harmed me by the neglect see. <https://casetext.com/case/union-oil-co-v-oppen> , Union Oil Company v. Oppen, see Jury Awards More Than \$1.5 Million in EEOC Sexual Harassment and Retaliation Suit against New Breed Logistics. MEMPHIS, Tenn. - A jury has rendered a verdict of more than \$1.5 million in the U.S. Equal Employment Opportunity Commission's (EEOC) sexual harassment and retaliation lawsuit against New

Breed Logistics, a North Carolina-based logistics services provider, the agency announced today. The verdict followed a seven-day trial before U.S. District Court Judge S. Thomas Anderson on behalf of four claimants and included awards of \$177,094 in back pay, \$486,000 in compensatory damages and \$850,000 in punitive damages for the discrimination victims.

The EEOC's lawsuit charged New Breed Logistics with subjecting three female employees in Memphis to sexual harassment and retaliating against the three female employees and one male employee for opposing the harassment in violation of Title VII. Specifically, the jury found that New Breed, through the conduct of a warehouse supervisor, harassed three temporary workers by subjecting them to unwelcome sexual touching and lewd, obscene and vulgar sexual remarks at the company's Avaya Memphis area warehouse facility.

Further, the EEOC charged and the jury found, a New Breed supervisor fired the three temp workers because they complained about the harassment. In addition, the EEOC said, the supervisor also retaliated against a male employee by terminating him because he opposed the harassment and agreed to serve as a witness for several claimants during the company's investigation.

Sexual harassment and retaliation for complaining about it violate Title VII of the Civil Rights Act of 1964. The EEOC filed suit (Civil Action No. 2:10-cv-02696-STA-tmp) in U.S. District Court for the Western District of Tennessee at Memphis after first attempting to reach a voluntary settlement. Other elements, cable marking affiliate McDonald's Franchisee Settles EEOC Sex Harassment Lawsuit Credle Enterprises to Pay \$340,000 to Resolve Claims of Physical and Verbal Harassment of Female Employees

DALLAS - Credle Enterprises, LLC, doing business as McDonald's in the Texas panhandle, will pay \$340,000 and furnish other relief to settle a sexual harassment lawsuit filed by the U.S. Equal Employment Opportunity Commission (EEOC), the federal agency announced today.

According to the EEOC's lawsuit, eight women who worked for the company were subjected to sexual harassment. The EEOC charged that two male employees, one of whom were the general manager, subjected the female employees to physical touching, sexual jokes and the display of pornographic images. The EEOC also charged that although management was aware of the harassment, no action was taken to prevent it from continuing.

Sexual harassment is a form of sex-based discrimination made unlawful by Title VII of the Civil Rights Act of 1964. The EEOC filed its lawsuit in U.S. District Court for the Northern District of Texas, Lubbock Division (EEOC v. Credle Enterprises, LLC d/b/a McDonald's, Civil Action No. 5:18-CV-00239-C), after first attempting to reach a pre-litigation settlement through its conciliation process.

The four-year consent decree settling the suit, signed on November 21, 2019 by U.S. District Court Judge Wes Hendrix, calls for the company to provide \$240,000 in monetary relief to eight women who were subjected to sexual harassment, and includes an additional class distribution fund of \$100,000 for administration by the EEOC to any other female employees subjected to harassment who were employed with the company during the relevant time.

Beyond the monetary terms of resolution, the decree requires the employer to implement measures to guard against sexual harassment going forward. Such measures include the designation of a managerial

employee who will be responsible for ensuring that Credle employees are trained on their rights and responsibilities under Title VII, as well as the company's policies and procedures on harassment, and for conducting investigations of all complaints of sexual harassment and retaliation.

The company will also conduct detailed annual sexual harassment training for all employees that encompasses topics such as respect and civility in the workplace; the ways in which employees can report unwelcome workplace behavior; how an employee who believes she has witnessed harassment can appropriately intervene; and the consequences of engaging in inappropriate conduct.

IV. CAUSES OF ACTION

FIRST CAUSE OF ACTION

Intentional Tort and Malice

8. On May 26, 2017, and prior unknown dates, AT&T, INC. and AT&T SERVICES, INC, investors and affiliates marking affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds, Inc, Conduit Global, Charter Communications, Inc., Vanessa Harrison, Debra Simpson Fyer, Tauheed Epps (aka) 2 Chainz, Nayvadius DeMun Wilburn (aka) Future Violated the Fair Housing Act, FTC Rules, FCC laws, and EEOC laws

9. Defendants AT&T, INC. and AT&T SERVICES, INC knew that <https://www.eeoc.gov/eeoc/newsroom/release/1-9-20b.cfm> and MH in its sugar production process. Despite this knowledge, Defendants AT&T, INC. and AT&T SERVICES, INC

10. As a direct and proximate result of these stated acts and omissions, breach of peace in the home and hotel room of Tinika Warren. Defendants AT&T, INC. and AT&T SERVICES, INC , investors and affiliates marking affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds, Inc, Conduit Global, Charter Communications, Inc., Vanessa Harrison, Debra Simpson Fyer, Tauheed Epps (aka) 2 Chainz, Nayvadius DeMun Wilburn (aka) Future I want an order of protection, they all intentionally defamed my name and interfered with me exercising my fair housing act rights.

SECOND CAUSE OF ACTION

Strict Tort Liability

11. The aforementioned Defendants AT&T, INC. and AT&T SERVICES, INC, AT&T, INC., AT&T SERVICES, INC, AT&T MOBILITY CORPORATION (DE), investors and affiliates marketing affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds, Inc, Conduit Global, Charter Communications, Inc.

12. Defendants AT&T, INC. and AT&T SERVICES, INC, AT&T, INC., AT&T SERVICES, INC, AT&T MOBILITY CORPORATION (DE), investors and affiliates marketing affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds, Inc, Conduit Global, corporate offices are located at 3400 **Bath Pike**, Suite 312, Bethlehem, PA 18017. Charter Communications, Inc. knew of this health risk and notwithstanding that knowledge, concealed these dangers violating public antitrust laws for the telecommunications industry.

13. As a result of Defendants AT&T, INC. and AT&T SERVICES, INC, AT&T, INC., AT&T SERVICES, INC, AT&T MOBILITY CORPORATION (DE), investors and affiliates marketing affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU

Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, McDonalds, Inc, McDonalds, LLC, Conduit Global, Charter Communications, Inc.

THIRD CAUSE OF ACTION

Public Nuisance (Against Defendant AT&T, INC. and AT&T SERVICES, INC and affiliates)

14. Defendant AT&T, INC. AT&T SERVICES, INC, **AT&T MOBILITY CORPORATION (DE)**, and affiliates method of creating a public nuisance that unreasonably endangers the health of the residents of Tinika Warren household.

15. By continuing to stalk, harass, intimidate, film, production of me and my family in "real time " and by failing to use due diligence, insulting my intelligence, Federal Trade Commission ("Commission" or "FTC"), filed its Complaint pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b) (Docket No. 1), and moved for summary judgment on all counts against all Defendants (Docket No. 77). Defendants are continuously advertising, marketing, promoting, offering, selling, or assisting others in advertising, marketing, promoting, offering, or selling, promoting my name in a defaming way by interfering with me getting access to fair housing loans, dwelling for rent, including a single-family home, townhouse, apartment, or condominium unit, employment, interruption of my daughter Genesis Williams SSI benefits and medical 504 plans confusion during medical visits, hospital stays and 504 plans implemented by her high school chair board members. Genesis called me and said the school has teamed up with these people who are apart of the United Bloods Gang, James B. Dudley High School and North Carolina A&T University Alumni who is conducting themselves like a gang to attack

me and my daughter hunting us down and following us everywhere we go treating us as we are completely different intimidating us by volatile force and creating medical health issues, homelessness and job loss.

16. As a direct and proximate cause of Defendant's acts and omissions, residents of Sundown Lodge (room# undisclosed) , 922 Lincoln Street, Greensboro, NC and 260 Northern Avenue, Apartment 10 B have knowingly violated our rights, The right to privacy is an element of various legal traditions to restrain governmental and private actions that threaten the privacy of individuals.[1][2] Over 150 national constitutions mention the right to privacy. Private sector actors can also threaten the right to privacy—particularly technology companies, such as Amazon tracking my purchases, hacked my Apple devices, hacked and holding my pages hostage Facebook, accessing my personal pictures in Gary E. Moore Google account that keeps data and all pictures, and hacked my Yahoo accounts that use and collected/ing personal data about me and my family. These concerns have been strengthened by scandals, including the Facebook–Cambridge Analytica data scandal, which focused on psychographic company Cambridge Analytica use personal data from Facebook to influence large groups of people.[4] harmful acts are causing me stress and pain suffering a poor reputation putting my immediate family in poverty. That is blocking us from getting jobs and public assistance. This is an abuse of power. Among, abuse of power or abuse of authority, in the form of "malfeasance in office" or "official misconduct", is the commission of an unlawful act, done in an official capacity, which affects the performance of official duties. Malfeasance in office is often grounds for a for-cause removal of an elected official by statute or recall election. § 11.448 Abuse of office.

A person acting or purporting to act in an official capacity or taking advantage of such actual or purported capacity commits a misdemeanor if, knowing that his or her conduct is illegal, he or she:

(a) Element: 14th amendment, due process, right to privacy, Subjects another to arrest, detention, search, seizure, mistreatment, dispossession, assessment, lien or other infringement of personal or property rights; or

(b) Denies or impedes another in the exercise or enjoyment of any right, privilege, power or immunity. 25 CFR § 11.448 - Abuse of office. 18 U.S. Code § 242. Deprivation of rights under color of law. Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death..

FOURTH CAUSE OF ACTION

Failure to obtain a Warrant bi-passed laws constitutional, amendments, & statutes

17. AT&T, INC. and AT&T SERVICES, INC, investors and affiliates marking affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds, Inc, Conduit Global, Charter Communications, Inc., Vanessa Harrison, Debra Simpson Fyer, Tauheed Epps (aka) 2 Chainz, Nayvadius DeMun Wilburn (aka) Future

, had a duty to issue notices by a bench warrant signed by a judge to Plaintiffs and the general public about the presence of judge with the legal capacity to sign such warrant. Rule 41. Search and Seizure, denial of their responsibilities, there is an urgent need for injunction to pay me to get me into a safe place, they have seen me naked way far too much and I am being raped all over again daily and my child was being molested by all of the people watching us in " real-time", live feed media, social media, news, programs, radio, TV broadcasting failed to apply Reasonable diligence and accommodations, 45 CFR § 160.401., (d) by legally Obtaining a Warrant.

(1) In General. After receiving an affidavit or other information, a magistrate judge—or if authorized by Rule 41(b), a judge of a state court of record—must issue the warrant if there is probable cause to search for and seize a person or property or to install and use a tracking device.

(2) Requesting a Warrant in the Presence of a Judge.

(A) Warrant on an Affidavit. When a federal law enforcement officer or an attorney for the government presents an affidavit in support of a warrant, the judge may require the affiant to appear personally and may examine under oath the affiant and any witness the affiant produces.

(B) Element proved: No Warrant nor Sworn Testimony was approved in the entire world. The judge may wholly or partially dispense with a written affidavit and base a warrant on sworn testimony if doing so is reasonable under the circumstances.

(C) Recording Testimony. Testimony taken in support of a warrant must be recorded by a court reporter or by a suitable recording device, and the judge must file the transcript or record with the clerk, along with an affidavit.

(3) Requesting a Warrant by Telephonic or Other Reliable Electronic Means. In accordance with Rule 4.1, a magistrate judge may issue a warrant based on information communicated by telephone or other reliable electronic means.

(e) Issuing the Warrant.

(1) In General. The magistrate judge or a judge of a state court of record must issue the warrant to an officer authorized to execute it.

(2) Contents of the Warrant. were not met by AT&T, INC. and AT&T SERVICES, INC, AT&T, INC., AT&T SERVICES, INC , AT&T MOBILITY CORPORATION (DE), investors and affiliates marketing affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds, Inc, Conduit Global, Charter Communications, Inc.

and affiliates, Avondale Reserve Apartments and it's interested parties or affiliates, City of Greensboro, North Carolina, Dekalb County Georgia, Fulton County Georgia, New York City, State of California, State of Virginia, Gary E. Moore Sr. Lawyer, Lacie Nicole Little, Debra Fryer Simpson, DaBroca Simpson, Shapell Fyer Depree, Ray Cooke of Homeland Security of Washington, DC from my hometown, Brian Seagraves and Belissa Anthony- Seagraves, Takisha Nicole Warren Wilson (former employee of At&T) , stalkers, Katheleen Field aka Katdaddy a stripper in Greensboro NC, New Jersey Atlanta areas, Australia Smith a stripper, mother Terry Smith, Greensboro NC, New Jersey, New York, Atlanta areas, BadBoy Records abuse of power, Sony Music Entertainment abuse of power, Epic Record abuse of power, Vanessa Harrison, Natalie Harrison Minicon, Debra Simpson Fryer, Shapell Fryer Depree, DaBroca Simpson, Jimmy Farmer (Section 8 housing authority employee) from Greensboro NC chasing me around Atlanta tracking me and each and every moment all the way to MY hometown North Carolina out of pure jealousy because their family memembr that I was friends with were envy of me not having their struggles with needing to ask anyone for money, me owning my homes, history as a

dancer, bettering my life by going to college. All this could impact my immediate family furthermore. I am fighting for my life right now.

(A) Warrant to Search for and Seize a Person or Property. Except for a tracking-device warrant, the warrant must identify the person or property to be searched, identify any person or property to be seized, and designate the magistrate judge to whom it must be returned. The warrant must command the officer to:

(i) execute the warrant within a specified time no longer than 14 days;

(ii) execute the warrant during the daytime, unless the judge for good cause expressly authorizes execution at another time; and

(iii) return the warrant to the magistrate judge designated in the warrant.

(B) Warrant Seeking Electronically Stored Information. A warrant under Rule 41(e)(2)(A) may authorize the seizure of electronic storage media or the seizure or copying of electronically stored information. Unless otherwise specified, the warrant authorizes a later review of the media or information consistent with the warrant. The time for executing the warrant in Rule 41(e)(2)(A) and (f)(1)(A) refers to the seizure or on-site copying of the media or information, and not to any later off-site copying or review.

(C) Warrant for a Tracking Device. A tracking-device warrant must identify the person or property to be tracked, designate the magistrate judge to whom it must be returned, and specify a reasonable length of time that the device may be used. The time must not exceed 45 days from the date the warrant was issued. The court may, for good cause, grant one or more extensions for a reasonable period not to exceed 45 days each. The warrant must command the officer to:

(i) complete any installation authorized by the warrant within a specified time no longer than 10 days;

(ii) perform any installation authorized by the warrant during the daytime, unless the judge for good cause expressly authorizes installation at another time; and

(iii) return the warrant to the judge designated in the warrant.

(f) Executing and Returning the Warrant.

(1) Warrant to Search for and Seize a Person or Property.

(A) Noting the Time. The officer executing the warrant must enter on it the exact date and time it was executed.

(B) Inventory. An officer present during the execution of the warrant must prepare and verify an inventory of any property seized. The officer must do so in the presence of another

officer and the person from whom, or from whose premises, the property was taken. If either one is not present, the officer must prepare and verify the inventory in the presence of at least one other credible person. In a case involving the seizure of electronic storage media or the seizure or copying of electronically stored information, the inventory may be limited to describing the physical storage media that were seized or copied. The officer may retain a copy of the electronically stored information that was seized or copied.

(C) Receipt. The officer executing the warrant must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken or leave a copy of the warrant and receipt at the place where the officer took the property. For a warrant to use remote access to search electronic storage media and seize or copy electronically stored information, the officer must make reasonable efforts to serve a copy of the warrant and receipt on the person whose property was searched or who possessed the information that was seized or copied. Service may be accomplished by any means, including electronic means, reasonably calculated to reach that person.

(D) Return. The officer executing the warrant must promptly return it—together with a copy of the inventory—to the magistrate judge designated on the warrant. The officer may do so by reliable electronic means. The judge must, on request, give a copy of the inventory to the person from whom, or from whose premises, the property was taken and to the applicant for the warrant.

Element (2) Warrant for a Tracking Device. Was not legally obtained and this is abuse of power. I want criminal charges and civil charges against each participant.

(A) Noting the Time. The officer executing a tracking-device warrant must enter on it the exact date and time the device was installed and the period during which it was used.

(B) Return. Within 10 days after the use of the tracking device has ended, the officer executing the warrant must return it to the judge designated in the warrant. The officer may do so by reliable electronic means.

(C) Service. Within 10 days after the use of the tracking device has ended, the officer executing a tracking-device warrant must serve a copy of the warrant on the person who was tracked or whose property was tracked. Service may be accomplished by delivering a copy to the person who, or whose property, was tracked; or by leaving a copy at the person's residence or usual place of abode with an individual of suitable age and discretion who resides at that location and by mailing a copy to the person's last known address. Upon request of the government, the judge may delay notice as provided in Rule 41(f)(3).

(3) Delayed Notice. Upon the government's request, a magistrate judge—or if authorized by Rule 41(b), a judge of a state court of record—may delay any notice required by this rule if the delay is authorized by statute.

18. Defendants AT&T, INC. and AT&T SERVICES, INC , investors and affiliates marking affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner

Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds, Inc, Conduit Global, Charter Communications, Inc., Vanessa Harrison, Debra Simpson Fyer, Tauheed Epps (aka) 2 Chainz, Nayvadius DeMun Wilburn (aka) Future

and it's affiliated listed above, along with Larry S. Dooley Head of Fulton County Sheriff Training Sniper, who was inside my home using the bedroom, bathroom, and living rooms and footage is available sneak peek for both, I had immunity by reporting to this court, Dekalb County Family Court, his boss of future threats to damage my life career, family threats of everything that I reported happened during the retaliation in other cases. Gary E. Moore Sr and his lawyer knew, or with the exercise of reasonable care, due diligence should have known that they were acting in malice pattern or practice of assault or torture. I warned the FBI and HUD of unethical policing and abuse of power.

(4) the term **“pattern or practice of assault or torture” means assault or torture engaged** in on at least two occasions; (3) the term “child abuse” means intentionally or knowingly causing death or serious bodily injury to a child;

(4) the term “pattern or practice of assault or torture” means assault or torture engaged in on at least two occasions; interfering with my medical decisions and healthcare choices, **women's domestic violence act**. Failed to seek the, and it's contractors made music production "songs" degrading me and relating to my cases for affordable housing and homelessness relating to my background as a medical assistant and nail tech. The Protection of Women from Domestic Violence Act 2005 is an Act of the Parliament of India enacted to protect women from domestic violence. It was brought into force by the Indian government from 26 October 2006. The Act provides for the first time in Indian law a definition of "domestic violence", with this definition being broad and including not only physical violence, but also

other forms of violence such as emotional/verbal, sexual, and economic abuse. We need to get everyone on the same page putting my interest before their own because in real life I am a stay at home mom and a loving mother.

The element of Civil Claim record of such disability, **Warren v. Commissioner, Social Security Administration, see transcripts, 1:18-cv-04088**

(5)the term “serious bodily injury” mentally stressing, has the meaning set forth in section 1365; and Nevada law protects “vulnerable persons” from abuse. A vulnerable person is someone who has a physical or mental impairment that substantially limits one or more of the major life activities of the person and has a medical or psychological record of the impairment or is otherwise regarded as having the impairment. NRS 41.1395(4)(e). The law specifically provides that the definition includes people with intellectual disabilities, severe learning disabilities, severe mental or emotional illness, or who has suffered from a terminal or catastrophic illness or injury. It may be helpful to note that the law’s language regarding a condition affecting “major life activities” and allowing for a condition to be diagnosed or merely “perceived” track the definitions of disability used in important statutes like the federal Americans with Disabilities Act, or ADA. “Abuse” falls into two categories. The first is a willful and unjustified infliction of pain, injury, or mental anguish. The second category involves an intentional deprivation of food, shelter, clothing, or services that are necessary to maintain the victim’s physical or mental health. NRS 41.1395(4)(a). The key component of this definition is that the alleged abuser must have acted willfully and without justification. It isn’t enough to show that the abuser was negligent or sloppy in how he or she cared for the mentally disabled person. Instead, the abuser needed to intend to do them harm.<https://ggrmlawfirm.com/blog/abuse-of-the-mentally-disabled/> making

me lose sleep, a consistent schedule, changed my social life, tracking me daily my sleep, body movements, recording me in real-time bathing, changing my hygiene products, combing my hair, working, my daughter school, driving, my bedroom, and my kitchen. Social stalking me and isolating me from people, places, and family due to being raped by their family members and alumni members and they are in **violation of Marsy' Law, Georgia Amendment 4, the Marsy's Law Crime Victim Rights Amendment**, was on the ballot in Georgia as a legislatively referred constitutional amendment on November 6, 2018. It was approved. I should have been able to go into hiding in an "undisclosed location", instead I am being put into the media and suffering a life_sentence for reporting acts of violence, rape, and domestic violence and forced to live a life of a struggle at not fault of my own but by the abuse of power.

(6)the term “torture” means conduct, whether or not committed under the color of law, that otherwise satisfies the definition set forth in section 2340(1). contained radioactive substances and Where Larry is a Very experienced Expert in IT **infrastructure** that is composed of seven major components. Internet Platforms – Apache, Microsoft IIS, .NET, UNIX, Cisco, Java. Computer Hardware Platforms – Dell, IBM, Sun, HP, Apple, Linux machines. Operating Systems Platforms – Microsoft Windows, UNIX, Linux, Mac OS X., data, forecast, family dysfunction, stress pain, and suffering. I just want my family to be safe. I am afraid someone is going to get hurt. Despite this knowledge, no information , warrant, service of court papers was offered to the see case : from any counties in Georgia nor North Carolina in which I lived as a resident. We were born and raised in Greensboro North Carolina. Larry has the ability to create stalking devices and Gary E Moore said he had radio waves. Aside, from that Rickey Smiley show feature Special K on his show in the mornings and his wife works with my sister at

Children's Hospital and is friends with Gary E Moore daughter who intentionally went to get a job with my sister Nichell Warren at Children's Hospital. Special K had brought some of his tickets to my nail shop in 2010, Gary Moore my significant other that I was living with got jealous of him saying that I look beautiful. I only took it as a compliment, not more than. Moore still feels uncomfortable with that remark.

19. See this case, At all times relevant to this litigation, Defendants AT&T, INC. and AT&T SERVICES, INC had actual and/or constructive knowledge of the dangers mentioned above. Despite this knowledge, AT&T, INC. and AT&T SERVICES, INC continued to operate with reckless disregard for the community around it by interfering with the “ Peace In my home”,

20. See this case, AT&T, INC. and AT&T SERVICES, INC breached its duty to warn the community about AT&T, INC. AT&T SERVICES, INC , AT&T, INC., AT&T SERVICES, INC , AT&T MOBILITY CORPORATION (DE), investors and affiliates marking affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, McDonalds, Inc, Conduit Global, Charter Communications, Inc. affiliates and AT&T, INC. and AT&T SERVICES, INC breached its duty to warn consumers of telecommunications and community services.

21. Defendants, failure to warn to train its staff to abide, rules, regulations, civil rights and FTC rules, HUD rules of law and Georgia laws for the courts of this jurisdiction

22. AT&T, INC., AT&T SERVICES, INC , AT&T MOBILITY CORPORATION (DE), investors and affiliates marking affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, McDonalds, Inc, Conduit Global, Charter Communications, Inc. failure to warn resulted in the death of a child and the illness of several others.

FIFTH CAUSE OF ACTION

Conspiracy and Fraud in Violation of the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. (sec) 1962, and Request for Treble Damages.

23. Defendants engaged in a conspiracy to defraud by collectively gathered information, pictures, images, footage, emails, domains, Facebook pages, phone hijacked breaching the peace in my home.

24. Defendants formed a AT& T, AT&T, INC., AT&T SERVICES, INC , AT&T MOBILITY CORPORATION (DE), investors and affiliates marking affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc, WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia,

Emory University Hospital, Mc Donalds, Inc, Conduit Global, Charter Communications, Inc. secretly recorded, filmed, streamed, in live feed media

25. All Defendants failed to contribute financially to my social security fund aimed at

26. Wages Element: Failed to pay me as an actress “ Real Housewife Actress”, since they were really recording me and live streaming me 24/7 is a violation under the federal minimum wage is \$7.25 per hour for workers covered by the FLSA. **Fair Labor Standards Act, severance pay, sick leave, vacations and holidays. It is clearly a form of sex trafficking me through exploiting my pictures, images, and an illegal sneak peek. A paid actress or model salary ranges from Hollywood’s highest-paid actress, having earned \$56 million between June 1, 2018 and June 1, 2019. Their illegal live streams of me caught the attention of people throughout the world.**

27. AT&T, INC.,AT&T SERVICES, INC , AT&T MOBILITY CORPORATION (DE), investors and affiliates marketing affiliates BadBoy Records, Sony Music Entertainment, Epic Records, TRU Foundation, Inc., Warner Music Group Inc,WMG, Warrick Dunn Charities, Aaron Rents, Inc, United Way of Metro Atlanta, State of Georgia Department of Health & Human Services, Children's Healthcare of Atlanta Georgia, Emory University Hospital, Mc Donalds,Inc, Conduit Global, Charter Communications, Inc. spearheaded the movement to

discourage written warnings EEOC regulations, Fair Housing Acts Rights, and Public Trust, and American's with Disabilities Act

28. As a result of this collective action to defraud the public, the Plaintiffs have suffered injuries indicated above. Treble damages are therefore appropriate under RICO to punish the conspiratorial nature of Defendants' planned intentional tort of a known mental health risk presented by and from Plaintiffs, resulting in the death of a child.

SIXTH CAUSE OF ACTION

Negligence

29. Defendants had a duty to pay for recording, images, live feeds, media releases of Tinika Warren but failed to obtain a warrant and are aggressive aggravated stalking me and my immediate family. Shared my images with the internal staff and a website where people could log into and view me in my home and wherever there was a camera. **A chapter 7 discharge is a permanent order from the court prohibiting creditors from taking any form of collection action on discharged debts. This includes legal action and communications with the debtor, such as telephone calls, letters, and personal contacts. While the debtor already had any temporary collection attempts halted with an automatic stay, the discharge is permanent and these people should not have stalked, harassed, bullied, humiliated, intimidarted me from 2016 - present with**

over 19, 000 people viewing me in LIVESTREAMS in my hotel room and home violated my right to privacy and constitutional rights under the law and human rights.

Georgia Chapter 7 filing: Abuse, Neglect, Harassment, Stalking

1. I should have been living happily enjoying my fresh start. After, my bankruptcy was discharged .
2. I was granted immediate protection against creditor's collection efforts and wage garnishment on the date of filing and thereafter Chapter 7 discharge
3. I am asking for Wages as an entertainer and upscale model hence this company has just human trafficked me and daughter.
4. There is no minimum amount of debt required but I had purchased three cell phones one for myself, daughter and son in which they used to spy and contact my incoming and outgoing phone records without a court order violating Chapter 7 Bankruptcy Code; due process of law
5. I should not have been tormenting and placed into the media by means of aggressive stalking and abusive tactics violating Chapter 7 Discharged and Fair Debt Collections Act.

Plaintiffs,

30. Defendant At&T and its affiliates had a duty to conduct legal business practices to the entire public without excluding Tinika Warren to fair treatment. Instead of tormenting me daily in front of millions of people.

31. Defendant AT&T had a duty abide by Federal Trade Commission Standards, FCC Standards, 2002 A New Look at Sexual Harassment under the Fair Housing Act: The Forgotten Role of §3604(c), This is inappropriate. It is true that the FHA contains a "terms and conditions" provision that parallels the one in Title VII that has been the key to sexual harassment law in employment. 8 But the FHA also contains an additional provision-§ 3604(c)⁹-that bans sexually discriminatory statements in a way that goes well beyond its Title VII counterpart. 10 The availability of § 3604(c) as an additional weapon in the arsenal against sexual harassment in housing-and its lack of use by courts and litigants is the subject of this Article. One example of the failure to fully appreciate that the FHA's ban on sexual harassment may go further than Title VII's is the determination by various federal courts to reject liability in cases where the defendant's behavior was not egregious enough to warrant a "terms and conditions" violation, but should have been held to violate § 3604(c).¹¹ While these decisions may be correct in applying Title VII law to sexual harassment claims based on the FHA's "terms and conditions" provision, they have erred in failing to also consider § 3604(c), which prohibits even isolated discriminatory housing statements. 12 The error is often traceable to the sexual harassment plaintiffs themselves, who have generally not asserted a § 3604(c) claim along with their other FHA claims. 13 This Article argues that § 3604(c) is applicable in virtually every sexual harassment case involving housing¹⁴ and that its applicability means the FHA can be a more effective statute for attacking sexual harassment than Title VII. Part I reviews the law governing sexual harassment in housing, including the role that Title VII precedents have had in shaping this law. Part II shows how § 3604(c) goes further than its Title VII counterpart in prohibiting

statements that are often at the heart of a sexual harassment claim and identifies some specific situations in which § 3604(c) may be helpful in challenging sexual harassment that would otherwise not be illegal. Finally, Part III deals with the potential First Amendment problems that may arise if § 3604(c) were applied to cases involving verbal sexual harassment.

I. SEXUAL HARASSMENT LAW AND THE FAIR HOUSING ACT

A. Overview of the Fair Housing Act and Its Similarity to Title VII

As originally enacted in 1968, the FHA banned discrimination in most residential dwellings on the basis of race, color, religion, and national origin.¹⁵ An amendment adding "sex" to the FHA's list of prohibited bases of discrimination was passed in 1974.¹⁶ Most of the FHA's basic substantive prohibitions have remained unchanged since 1968.¹⁷ For purposes of this Article, four of these substantive provisions are particularly important: § 3604(a) makes it unlawful to refuse to sell, rent, or negotiate for the sale or rental of, or to "otherwise make unavailable or deny, a dwelling to any person because of race [or other prohibited factor]"; § 3604(b) supplements § 3604(a)'s ban on refusals to deal by prohibiting discrimination in the terms, conditions, or privileges of the sale or rental of a dwelling and in the provision of services or facilities in connection therewith; § 3604(c) prohibits discriminatory notices, statements, and advertising; and § 3617 outlaws coercion, intimidation, threats, and interference with the rights guaranteed by §§ 3604-3606.^s The language of all four of these crucial provisions is similar, but not identical, to comparable prohibitions in Title VII of the Civil Rights Act of 1964, the federal employment discrimination law that was passed four years before the FHA.⁹ For example, Title VII's key substantive prohibition makes it unlawful for an employer both to "refuse to hire or to discharge" and "otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment "

" 2

-practices that roughly correspond to the FHA's prohibitions of discriminatory refusals to deal and discriminatory terms and conditions in § 3604(a) and § 3604(b). Title VII also prohibits employers from publishing "any notice or advertisement . . . indicating any

32. All Defendants breached their respective duties to the telecommunications to the Plaintiffs. As a result, Plaintiffs have suffered damages indicated above.

Punitive Damages

33. The conduct of Defendants described above is outrageous. Defendants' conduct demonstrates a reckless disregard for human life and a conscious disregard for public safety. The acts and omissions described above were willful and performed with actual or implied malice. Punitive and exemplary damages are therefore appropriate and should be imposed in this instance.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray for a judgment against Defendants for:

1. Injunctive and equitable relief as the Court deems appropriate including:
 - i) Requiring Defendant AT&T to test and to monitor the Live Feed of Each employee, and it's partner affiliates, terminate all employees and contracts that they have with the artist, labels, independent artist, garnish earnings from the liable artist, employees, not to engage in business with contracted artist whom has a gang reputation and independent contractors
 - ii) Requiring Defendant to pay Tinika S. Warren immediately to accommodate me to safe housing out of the eye of these stalkers
 - iii) Compelling Defendant's to remove existing microchips, bugs, spying devices, phone taps, GPS devices by any expeditious necessary means with notifications and proof of disabling stalking methods and devices to this court within 24-28 upon service of the complaint and brief; available in the Pacer and
 - iv) Seal this record

2. Compensatory damages to be paid by all Defendants, according to proof at trial;
testimony or evidence
3. Punitive damages as the court deem appropriate based on the companies value, stocks,
inventory, investments;
4. Costs and attorneys fees of this lawsuit, with interest;
5. Any other relief as the court deems appropriate.
6. In addition, to the relief, compensation, as stated on the statement of claim box VII.of the
civil cover sheet in the demand of \$60 Billion dollars with the checks deposited to the
Clerk of Court, United States Federal Northern District Court of Atlanta, Georgia.

Dated: January 13, 2020

Tinika S. Warren

Pro Se, Plaintiff

ASKING PARTY: PLAINTIFFS Tinika Warren

ANSWERING PARTY:

SET NUMBER ONE

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs Tinika Warren, request that Defendant AT& T Inc, and affiliates identify, produce, and permit the inspection and copying or photographing, by or on behalf of said party, of the following documents, papers, books, photographs, objects, or tangible things at or before 5:00 p.m. at the following address:

Tinika Warren

Located in: Richard B. Russell Federal Building

Address: 75 Ted Turner Dr NW Suite 2211, Atlanta, GA 30303

Phone: (404) 215-1600

INSTRUCTIONS

1. These requests require the production of all responsive documents within the sole or joint possession, custody or control of the Defendant, including their agents, departments, attorneys, directors, officers, employees, consultants, investigators, insurance companies, or other persons subject to Defendant's custody or control.
2. All documents that respond, in whole or in part, to any portion of these Requests must be produced in their entirety, including all attachments and enclosures.
3. For purposes of these requests, the words used are considered to have, or should be understood to have their ordinary, everyday meanings. Plaintiffs refer Defendant to any dictionary in the event that Defendant asserts that the wording of a request is vague, ambiguous, unintelligible, or confusing.

DEFINITIONS

4. The words “and,” “or,” “each,” “any,” “all,” “refer,” and “discuss,” shall be construed in their broadest form and the singular shall include the plural and the plural shall include the singular whenever necessary so as to bring within the scope of these Requests all documents (defined below) that might otherwise be construed to be outside their scope.
5. Solely for the purpose of the TREC 2007 legal track, the term “Defendant” shall include the named defendant companies in this complaint as well as all other companies whose records are found in the TREC collection database.
6. Solely for the purpose of the TREC 2007 legal track, “document” means all data, information or writings stored in the TREC legal database, including, without limitation: any written, electronic or computerized files, data or software; memoranda, emails correspondence, OCR scanned images, communications, reports, summaries, studies, analyses, evaluations, notes or notebooks, indices, spreadsheets, logs, books, pamphlets, binders, calendar or diary entries, ledger entries, press clippings, graphs, tables, charts, printouts, drawings, maps, meeting minutes, and transcripts. The term document encompasses all metadata associated with the document. The term also includes all drafts associated with any particular document. The term is also intended to include all electronically stored information as the term is used in the Federal Rules of Civil Procedure,
7. The terms “relating to,” “regarding,” “discussing,” or “concerning,” shall be synonymous and should be taken to mean in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying or stating. **The First Amendment**

guarantees freedoms concerning religion, expression, assembly, and the right to petition. It forbids Congress from both promoting one religion over others and also restricting an individual's religious practices. The conspiracy parties , defendants violated my freedom of religion.

8. Element, FHA, Sexual harassment in housing is a significant national problem. 3
Although less visible than the comparable problem in employment, sexual 1. The scenario described here is a fictional amalgamation of various actual fair housing harassment cases, primarily *DiCenso v. Cisneros*, 96 F.3d 1004 (7th Cir. 1996). See *infra* note 76 and accompanying text. 2. See *infra* Part I.B.3. 3. Commentators and fair housing enforcement officials generally agree that housing harassment is a problem of serious magnitude. E.g., Interview with Joan Magagna, Chief of Housing and Civil Enforcement Section, Civil Rights Division, U.S. Department of Justice, in Washington, D.C. (June 24, 2002); Interview with David H. Enzel, Deputy Assistant Secretary for Enforcement and Programs, Office of Fair Housing and Equal Opportunity, U.S. Department of Housing & Urban Development, in Washington, D.C. (June 24, 2002); Interview with Shanna L. Smith, President/CEO, National Fair Housing Alliance, in Washington, D.C. (June 24, 2002). We have found that providing documentary support for this conclusion is difficult, however. For example, HUD's reports on administrative complaints filed each year under the federal Fair Housing Act lump together all sex-based claims, thereby making it impossible to identify the number of claims involving sexual harassment as distinguished from other types of sex discrimination claims. See, e.g., OFFICE OF PROGRAM STANDARDS & EVALUATION, U.S. DEPT OF Hous. & URBAN DEV., 1994 ANNUAL REPORT TO CONGRESS ON FAIR HOUSING PROGRAMS 26

(1996). The only source that we are aware of that has ever attempted to provide a statistical basis for the number of such claims is an article published fifteen years ago in the Wisconsin Law Review, which reported a survey of housing centers around the country that learned of 288 cases of sexual harassment in housing that had been reported to these centers. See Regina Cahan, Comment, Home is No Haven: An Analysis of Sexual Harassment in Housing, 1987 WIS. L. REV. to61, to66. Noting studies which indicate that sexual harassment in the Sexual Harassment in Housing and § 3604(c) 773 harassment in housing may be as prevalent and probably more devastating to its victims.

4 Nevertheless, relatively little attention has been paid to this issue or to the law that should govern it. Indeed, the law of sexual harassment in housing developed well after and in virtual lock -step with the law of sexual harassment in employment.s Thus, courts have simply interpreted the Fair Housing Act (FHA)⁶ to prohibit sexual harassment to the same degree-and only to the same degree as it is prohibited in employment by Title VII of the 1964 Civil Rights Act. 7 This is inappropriate. It is true that the FHA contains a "terms and conditions" provision that parallels the one in Title VII that has been the key to sexual harassment law in employment. 8 But the FHA also contains an additional provision-§ 3604(c)⁹-that bans sexually discriminatory statements in a way that goes well beyond its Title VII counterpart. 10 The availability of § 3604(c) as an additional weapon in the arsenal against sexual harassment in housing-and its lack of use by courts and litigants is the subject of this Article. One example of the failure to fully appreciate that the FHA's ban on sexual harassment may go further than Title VII's is the determination by various federal courts to reject liability in cases where the defendant's behavior was

not egregious enough to warrant a "terms and conditions" violation, but should have been held to violate § 3604(c).¹¹ While these decisions may be correct in applying Title VII law to sexual harassment.

9. The term, made by the Fair Housing Amendments Act of 1988, such as broadening the scope of § 3605's ban on discriminatory home financing, providing a special set of handicap-related provisions in § 3604(f), adding an exemption for reasonable occupancy restrictions in § 3607(b)(1), and exempting housing for older persons from the new familial status prohibitions in § 3607(b). Fair Housing Amendments Act, §§ 5-6, 102 Stat. at 1619-23 (codified at 42 U.S.C. §§ 3604(f), 3605, 3607(b)(1) and 3607(b) (1994)). The Fair Housing Amendments Act of 1988 also made major changes to the FHA's enforcement procedures. See §§ 7-8, 102 Stat. at 1623-35. (codified at 42 U.S.C. §§ 3610-3614 (1994)). See generally James A. Kushner, *The Fair Housing Amendments Act of 1988: The Second Generation of Fair Housing*, 42 VAND. L. REV. 1049 (1989). 18. See 42 U.S.C. §§ 3604(a)-(c), 3617. The FHA's other substantive provisions are § 3604(d), which bans discriminatory misrepresentations concerning the availability of housing; § 3604(e), which outlaws "blockbusting"; § 3604(f), which contains a number of provisions designed to provide equal housing opportunities for handicapped persons; § 3605, which prohibits discrimination in home loans and certain other housing-related transactions; and § 3606, which bans discrimination in multiple-listing and other brokerage services. 42 U.S.C. §§ 3604(d)-(f), 3605-3606. 19. See 42 U.S.C. § 2000e. The 1964 Civil Rights Act also prohibits discrimination in public accommodations, see *id.* § 2000a, and federally funded programs, see *id.* § 2000d, but these prohibitions are much

shorter and simpler than those of Title VII and therefore not nearly as comparable to the FHA as Title VII. 20. *Id.* § 2000e-2(a)(1). preference, limitation, specification, or discrimination,"² a provision that is directed against some of the same discriminatory practices outlawed by § 3604(c), although, as we shall see, the latter provision is significantly broader than its Title VII counterpart.²² Finally, Title VII prohibits retaliation against those who have exercised their rights under the employment statute,²³ a provision that is somewhat similar to § 3617's protections against coercion and interference. ⁴ Cases recognizing that harassment in employment might violate Title VII date back at least to 1971.⁵ In the latter 1970s, "[t]he topic of sexual harassment in the workplace exploded upon the scene." ²⁶ In 1980, the Equal Employment Opportunity Commission (EEOC) issued guidelines identifying sexual harassment as a form of sex discrimination prohibited by 21. *Id.* § 2000e-3(b). ^{22.} See *infra* Part III. ^{23.} 42 U.S.C. § 2000e-3(a). ^{24.} *Id.* § 3617. There are other major similarities between Title VII and the FHA. Both statutes prohibit discrimination "because of" race and certain other factors, leading courts to conclude that the standards of proof under the two laws should be interpreted in a similar fashion. See, e.g., cases cited at ROBERT G. SCHWEMM, HOUSING DISCRIMINATION: LAW AND LITIGATION §§ 10:2 n.25, 10:3 nn.27-28, 10:4(1) nn. 18-21, 10:6 n. 15 (2001). In addition, both statutes include exemptions for religious organizations, private clubs, and small operators. See *supra* note 15 (FHA exemptions), 42 U.S.C. § 2000e-1(a), § 2000e(b)(2), and § 2000e(b) (Title VII exemptions). As a result of the various similarities and the parallel goals of Title VII and the FHA, courts have generally seen fit to interpret them consistent with one another. See

SCHWEMM, *supra*, § 7:4. 25. See *Meritor Sav. Bank v. Vinson*, 477 U.S. 57, 65-66 (1986) (identifying *Rogers v. EEOC*, 454 F.2d 234 (5th Cir. 1971) as "apparently the first case to recognize a cause of action based upon a discriminatory work environment"). Rogers involved a Hispanic complainant who alleged that her employer created an offensive work environment for employees by giving discriminatory service to its Hispanic clientele. 454 F.2d at 236. In *Meritor*, the Court cited Rogers and other lower court decisions upholding Title VII harassment claims based on race and national origin as well as sex, thereby endorsing the view that harassment in violation of Title VII may be based on the plaintiff's race, national origin, or other protected status as well as sex. See *Meritor*, 477 U.S. at 65-66. 26. 3 LEX K. LARSON, EMPLOYMENT DISCRIMINATION 46-8 (2d ed. 2002). According to LARSON, *supra*, at 46-9, the first federal decision to uphold a Title VII claim based on sexual harassment occurred in 1976 in *Williams v. Saxbe*, 413 F. Supp. 654 (D.D.C. 1976), order vacated by 587 F.2d 1240 (D.C. Cir. 1978), on remand, 487 F. Supp. 1387 (D.D.C. 1980). Williams and other early cases are reviewed in Note, Sexual Harassment and Title VII: The Foundation for the Elimination of Sexual Cooperation as an Employment Condition, 76 MICH. L. REV. 1007, 1010-16 (1978). See generally CATHERINE A. MACKINNON, SEXUAL HARASSMENT OF WORKING WOMEN (1979). Sexual Harassment in Housing and § 3604(c) Title VII. 27 Two years later, the Eleventh Circuit issued an influential sexual harassment opinion in favor of the plaintiff in *Henson v. Dundee*,² " which ultimately helped shape Supreme Court jurisprudence in this area and also influenced early FHA harassment cases.²⁹ Thus, by 1986 when the Supreme Court decided its first sexual

harassment case in *Meritor Savings Bank v. Vinson*,³¹ "a good deal of Title VII law on this subject had already been written. *Meritor* was a case brought by a bank employee who alleged that her branch manager made unwelcome sexual advances toward her and that she engaged in a lengthy sexual relationship with him out of fear of losing her job.³² The defendant conceded that sexual harassment affecting the economic aspects of an employee's job (i.e., quid pro quo harassment) violates Title VII, but it argued that harassment leading to noneconomic injuries (i.e., hostile environment harassment) should not be actionable.³³ The Supreme Court disagreed. Without dissent, the Court concluded that "a plaintiff may establish a violation of Title VII by proving that discrimination based on sex has created a hostile or abusive work environment."³⁴ The plaintiff's claim in *Meritor* was based on that part of Title VII banning discrimination in the "terms, conditions, or privileges of employment,"³⁵ and the Court held that this provision is violated by harassment that is shown to be "sufficiently severe or pervasive 'to alter the conditions of [the victim's] employment and create an abusive working environment.'" ³⁶ In applying this "severe or pervasive" standard, the *Meritor* opinion determined that sexual advances are to be considered acts of harassment if they are "unwelcome." ³⁷ In a final section of its opinion, in *Meritor*, the Court addressed the issue of whether the bank should be "strictly liable" for its manager's harassment, advising that "courts [should] look to agency principles for guidance in this area," but declining to issue "a definitive rule on employer liability."³⁸ All of the Supreme Court's subsequent Title VII decisions dealing with sexual harassment built on the foundation established by *Meritor*. For example, in 1993, in *Harris v. Forklift Systems, Inc.*,³⁹ the Court rejected a defendant's

argument that hostile environment claims could only succeed if the challenged conduct "seriously affect[ed] plaintiff's psychological wellbeing." 39 Such a requirement was seen as inconsistent with the basic "severe or pervasive" standard of Meritor, which the Harris opinion reaffirmed as controlling hostile environment claims under Title VII's provision banning discriminatory "terms and conditions." 40 " This standard meant that "[c]onduct that is not severe or pervasive enough to create an objectively hostile or abusive work environment-an environment that a reasonable person would find hostile or abusive-is beyond Title VII's purview."⁴¹ On the other hand, determining whether specific conduct is sufficiently severe or pervasive to be actionable could not be made to depend solely on whether the target of that conduct suffered psychological harm, because this factor, though relevant, is only one of a myriad of circumstances that must be considered.⁴² According to Harris, these circumstances "may include the frequency of the discriminatory conduct; its severity; whether it is physically threatening or humiliating, or a mere offensive utterance; and whether it unreasonably interferes with an employee's work performance."⁴³ Finally, in 1998, the Court decided three more cases-Oncale v. Sundowner Offshore Services, Inc.,⁴⁴ Burlington Industries, Inc. v. Ellerth,⁴⁵ and Faragher v. City of Boca Raton⁴⁶ -that built on its sexual harassment jurisprudence. All three were prompted by claims under Title.

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REQUEST FOR PRODUCTION OF DOCUMENTS NO. 7 [TOPIC 58]:

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Dated: October 22, 2020

Tinika S. Warren

ProSe