

**United States District Court**

DISTRICT OF NEVADA

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2009 APR 13 P 2:40

APPLICATION TO PROCEED IN DISTRICT COURT  
 FORMA PAUPERIS, SUPPORTING  
 DOCUMENTATION AND ORDER  
 BY \_\_\_\_\_ DEPUTY

Terry M. Chastain v. Watchtower, Bible &amp; Tract Society

2:09-cv-00654-RCJ-RJJ

I, Terry M. Chastain, declare that I am the (check appropriate box)☒ petitioner/plaintiff☐ movant (filing 28 U.S.C. 2255 motion)☐ respondent defendant☐ \_\_\_\_\_  
other

in the above-entitled proceeding; that, in support of my request to proceed without being required to prepay fees, cost or give security therefor, I state that because of my poverty, I am unable to pay the costs of said proceeding or give security therefor; that I believe I am entitled to relief. The nature of my action, defense, or other proceeding of the issues I intend to present on appeal are briefly stated as follows:

In further support of this application, I answer the following questions.

1. Are you presently employed? Yes ☐ No ☒
  - a. If the answer is "yes," state the amount of your salary or wages per month, and give the name and address of your employer. (list both gross and net salary)
  - b. If the answer is "no," state the date of last employment and the amount of the salary and wages per month which you received. 8/21/2008 \$156.00
2. Have you received within the past twelve months any money from any of the following sources?
  - a. Business, profession or other form of self-employment Yes ☐ No ☐
  - b. Rent payments, interest or dividends? Yes ☐ No ☐
  - c. Pensions, annuities or life insurance payments? Yes ☐ No ☐
  - d. Gifts or inheritances? Yes ☒ No ☐
  - e. Any other sources? Yes ☒ No ☐

AO 240 Reverse

If the answer to any of the above is "yes," describe each source of money and state the amount received from each during the past twelve months.

Son, \$80.00

UNLV Financial Aid \$4,500

3. Do you own any cash, or do you have money in checking or savings accounts?

Yes ☒ No ☐ (Include any funds in prison accounts.) \$10.00

If the answer is "yes," state the total value of the items owned.

4. Do you own or have any interest in any real estate, stocks, bond, notes, automobiles or other valuable property (excluding ordinary household furnishings and clothing)?

Yes ☐ No ☒

If the answer is "yes," describe the property and state its approximate value.

5. List the persons who are dependent on you for support, state your relationship to those persons, and indicate how much you contribute toward their support. None.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 10, 2009

(Date)

Signature of Applicant

**CERTIFICATE**  
(Prisoner Accounts Only)

I certify that the applicant named herein has the sum of \$ \_\_\_\_\_ on account to his credit at the \_\_\_\_\_ institution where he is confined. I further certify that the applicant likewise has the following securities to his credit according to the records of said institution: \_\_\_\_\_

\_\_\_\_\_ I further certify that during the last six months the applicant's average balance was \$ \_\_\_\_\_

Authorized Officer of Institution

**ORDER OF COURT**

The application is hereby denied

United States Judge

Date

The application is hereby granted. Let the applicant proceed without prepayment of cost or fees or the necessity of giving security therefor.

United States Judge or  
Magistrate Judge

Date

Terry M. Chastain  
Name  
1350 Town Center Dr. #1032  
Las Vegas NV 89144  
(702) 644-6267

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2009 APR 13 P 2:40

CLERK OF DISTRICT COURT  
DISTRICT OF NEVADA

DEPUTY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Terry M. Chastain, )  
Plaintiff, )  
vs. )  
Watchtower Bible & Tract Society, )  
Jim Smith, )  
Vanessa Smith, )  
Allen Carly, )  
Max Bravo, )  
Defendant(s). )

2:09-cv-00654-RCJ-RJJ

CIVIL RIGHTS COMPLAINT  
PURSUANT TO  
42 U.S.C. § 1983

A. JURISDICTION

- 1) This complaint alleges that the civil rights of Plaintiff, Terry M. Chastain  
(Print Plaintiff's name)

who presently resides at 1350 Town Center Dr #1032, Las Vegas NV 89144 were

violated by the actions of the below named individuals which were directed against

Plaintiff at Kingdom Hall of Jehovah's Witnesses / Carson on the following dates  
(institution/city where violation occurred)

BICO, Inciting Hate Crime, and Stalking  
(Count I) (Count II) (Count III)

Make a copy of this page to provide the below information if you are naming more than five (5) defendants

- 2) Defendant Watchtower Bible & Tract Society resides at 25 Columbia Heights, Brook,  
(full name of first defendant) (address if first defendant)  
and is employed as headquarters of Jehovah's Witnesses. This defendant is sued in his/her  
(defendant's position and title, if any)  
☐ individual ☒ official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Aided and abetted in the stalking, slander and inciting of hate-crime. Also Conspiracy of RICO

- 3) Defendant Jim Smith resides at 1258 Sultan Cir, Carson, CA 90746  
(full name of first defendant) (address if first defendant)  
and is employed as Jehovah's Witness elder. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Jim incited hate crime, stalked, slandered and violated the RICO ACT. All for the purpose of attaining and maintaining position in an organization.

- 4) Defendant Vanessa Smith resides at 1258 Sultan Cir, Carson, CA 90746  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☐ official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Vanessa Smith incited hate crime against the plaintiff. Stalking, slander and violation against the RICO ACT w.

- 5) Defendant Allen Curly resides at 22421 Figueroa St, Carson, CA 90745  
(full name of first defendant) (address if first defendant)  
and is employed as elder. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Allen Curly incited hate crime against the defendant. RICO Slander and Stalking were also committed for maintaining attaining prominence in an organization.

Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants

2) Defendant Max Bravo resides at 1244 E. Millmont St, Carson CA 90746  
(full name of first defendant) (address if first defendant)  
and is employed as elder. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☐ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Max Bravo aided and abetted in stalking the victim.  
Also in slander inciting hate crime and violation of the RICO ACT

3) Defendant Sheila Cardenes resides at 22421 Figueroa St, Carson CA 90745  
(full name of first defendant) (address if first defendant)  
and is employed as elder's wife pioneer. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☐ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Sheila Cardenes stalked, slander and incited hate  
crime against the plaintiff. She also violated the RICO ACT

4) Defendant Jerry Carmene resides at 17855 Cherry Street, Hispenia CA  
(full name of first defendant) (address if first defendant)  
and is employed as elder. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☐ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Jerry Carmene stalked, slandered and incited hate crime  
against the plaintiff. He also violated the RICO ACT

5) Defendant John Butts resides at 22421 Figueroa St, Carson CA 90745  
(full name of first defendant) (address if first defendant)  
and is employed as elder. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☐ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: John Butts stalked, slandered and incited hate crime  
against plaintiff. He also violated the RICO ACT

**Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants**

2) Defendant Ray Belemare resides at 301 Beryl St. Redondo Beach 90277  
(full name of first defendant) (address if first defendant)  
and is employed as elder. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Raymond Belemare aided and abetted in stalking, slander  
and inciting hate crime against the plaintiff. Also conspiracy of RICO

3) Defendant Rawlin Seekins resides at 1501 Figueroa St. Wilmington, CA 90745  
(full name of first defendant) (address if first defendant)  
and is employed as elder. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Rawlin Seekins aided and abetted in stalking, slander  
and inciting hate-crime against the plaintiff. Also conspiracy of RICO.

4) Defendant Ruben Garcia resides at 1501 Figueroa St. Wilmington, CA 90745  
(full name of first defendant) (address if first defendant)  
and is employed as elder. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Ruben Garcia aided and abetted in stalking, slander  
and inciting hate-crime against the plaintiff. Also conspiracy of RICO.

5) Defendant Archie Malone resides at 1335 S. Mojave Rd. Las Vegas, NV 89104  
(full name of first defendant) (address if first defendant)  
and is employed as elder. This defendant is sued in his/her  
(defendant's position and title, if any)  
☒ individual ☒ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: Archie Malone aided and abetted in stalking and inciting  
hate crime against the plaintiff. Also conspiracy of RICO.

6) Defendant Charles Thomas resides at 7321 Lucerne Vista Yucca Valley CA 92284  
 (full name of first defendant) (address if first defendant)  
 and is employed as elder. This defendant is sued in his/her  
 (defendant's position and title, if any)  
☒ individual ☐ official capacity. (Check one or both). Explain how this defendant was  
 acting

under color of law: Charles Thomas aided and abetted in stalking the victim, slander and inciting hate crime. Also conspiracy of RICO.

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

#### B. NATURE OF THE CASE

1) Briefly state the background of your case.

Within a period of 10 years, I have been a victim of countless crimes at the hands of members within the religion, Jehovah's Witnesses. This is due to the incitement of hate crime by <sup>certain</sup> Jehovah's Witnesses elders and their wives, against the younger members of the minority within the religion of the anointed class. Besides the crimes committed against me for being of the anointed class, elders have used fear intimidation stalking, terror and the threat of disfellowshipping anyone who comes to my assistant. This very threat was recently made to a young man, who his elder ordered to send a defamatory letter about me to Headquarters or he will be disfellowshipped. It's ironic that this young man witnessed his own mother over 30 years ago being mentally tortured by her elders for assisting one of the anointed. Her dear friend was disfellowshipped while she was sleep when her abusive husband told the elders she was drunk. She committed suicide!

#### C. CAUSE OF ACTION

## COUNT I

The following civil rights has been violated: Violation of the RICO ACT:  
Racketeering Influenced Corrupt Organization.

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

The enterprise is the religious organization, Jehovah's Witnesses. The pattern of racketeering is that of bribery, tampering with a witness, intimidating a witness and retaliation against a witness. The participants are Jim & Vanessa Smith, Allen Corley, Jerry Carmene, John Butts, Raymond Belmore, Max Bravo, Rawlin Seekins, Robin Garcia, Sheila Cardenas and Charles Thomas. The defendants have committed these crimes and more, for the united purpose of attaining and maintaining prominence within the enterprise. They united as one over a period of ten years to commit the crimes listed and more against me, because I am a member of the anointed class. Because the Jehovah's Witnesses teach the anointed will rule in heaven with Jesus and will rule over the earth, these elders, and own everything, seeing me as a threat, their jealousy and hatred for the young anointed has incited them to do whatever it takes to try to destroy me. When I reported the crime, my sister Vanessa and her husband Jim committed against me, they went to all my family and friends, telling them I have a mental problem, because I say I'm anointed. They along with Sheila Cardenas would seek out person the elders know are dangerous and try to incite them to commit violent acts against me. I had to attain a restraining order on one person as a result.

When I reported to Headquarters the stalking against me by Allen Corley, his accusing me of being crazy for saying I'm anointed and Jerry Carmene touching a sister on her breast in a dark room in the Kingdom Hall, Corley, Carmene, Butts

Belmore orchestrate Carmene writing a letter saying it was written by Logan Diphant packed with slander only to have me disfellowshipped. Max Bravo was the chairman and in on the racketeering. Rawlin Seekins and Robin Garcia said I was disfellowshipped because of what I told the Headquarters about Allen Corley.

When Logan found out, he said he never wrote that letter!



## COUNT II

The following civil rights has been violated: Inciting hate crime

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Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

I am one of Jehovah's Witnesses. I am also one of the anointed class, who are taught from the bible, while still on earth, we are to use our talents, gifts helping the less fortunate. As a mediator who mediated for the Los Angeles Superior Courts, and an Inclusion Specialist Assistant, who worked with the Los Angeles School District, as Ann Sullivan did with Helen Keller, I used my training to help Witness women who were suicidal, psychopathic, abused and schizophrenic. I'd also teach these women how to clean, sew, decorate their homes and love their husbands.

These women and their family members would run to elders, like Allen Curly, Jerry Carmene, Jim Smith and show them the gift I'd give. Because of wanting to control the members, the gifts they give and wanting prominence for themselves and their families, they decided the only way to turn the love of the friends and family into hate is to, using their position as elders, the podium, their connection with the Legal Department at Headquarters and hate propaganda, to incite a hate crime. Vanessa Smith and Sheila Cardenas stalked me, go to the women I helped and brainwashed them into hating me. Jim went to all men in my family with his hate. He went straight to the brother-in-law everyone knew was jealous, violent and even gave my father a black eye beat my sister for decades. Bill repeated to me what Jim told him and attacked me. Allen Curly brainwashed the elders who loved me into

Joining him in the stalking. One was the good man Max Brown, who disowned me and was incited to such hatred for me by Allen Curly, that he skimmed the phone down in my face twice, called me an apostate and told me to never call his house again.

## COUNT III

The following civil rights has been violated: Stalking

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

Allen Corley is an elder of Jehovah's Witnesses, a militaristic genius and cut his eye tooth on the politics of corporate America. He was my husband's employer and good friend. Yet he had some dark and deep pain from his mother separating from his biological father and marrying a stepfather that was so abusive, he (Allen) had to run to the military to escape the abuse. The women in the congregation had to pay dearly for his mother's actions. So when Allen came to the rescue of the Carson North Congregation's book keeping, the elders John Butts, Fred Perry and Acusa Polotti made the mistake of giving him card biscuits. He first wasted no time in setting himself up as a God. His first demand was, for these elders to turnover their balls and their love for good women, in exchange for his deranged, deranged hatred for strong women. He and the elders began to torture these women and drive them out of the congregation. He forbid women to leave their abusive husbands. As a result, the sister Alveda McMath's husband stuck a gun up her mouth and blew her brains out. Allen's black heart felt nothing. Because when I left my husband and he <sup>Allen</sup> attacked me, I attacked back. The new taste and thirst for my blood, the psychopath that he is, sent him on a war path of stalking writing hate letter to every congregation I ran to and the Legal Department for over 10 years.

## D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

- 1) Have you filed other actions in state or federal courts involving the same or similar facts as involved in this action? ☐ Yes ☒ No. If your answer is "Yes", describe each lawsuit. (If more than one, describe the others on an additional page following the below

outline).

- a) Defendants: \_\_\_\_\_
- b) Name of court and docket number: \_\_\_\_\_
- c) Disposition (for example, was the case dismissed , appealed or is it still pending?):  
\_\_\_\_\_
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 2) Have you filed an action in federal court that was **dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?**  
\_\_\_\_ Yes ☒ No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_

- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? ☒ Yes \_\_\_\_\_ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) \_\_\_\_\_ disciplinary hearing; (2) \_\_\_\_\_ state or federal court decision; (3) \_\_\_\_\_ state or federal law or regulation; (4) \_\_\_\_\_ parole board decision; or (5) \_\_\_\_\_ other \_\_\_\_\_.
- If your answer is "Yes", provide the following information. Grievance Number \_\_\_\_\_.
- Date and institution where grievance was filed \_\_\_\_\_.

Response to grievance: I sent a legal brief to the Attorney General  
here in Las Vegas about a year ago, and she never  
responded.

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**E. REQUEST FOR RELIEF**

I believe that I am entitled to the following relief:

I was driven from my home, due to the stalking and the inciting of hate crimes for 10 years. Homeless and sleeping in the streets. For five years due to the affect the stalking had on my health, I couldn't work. My granddaughter was taken from me and put in a foster home. My son was raised by a Korean woman I met only once. All of my possession were either stolen or destroyed. My reputation was destroyed. So due to that, the pain, suffering and emotional suffering, I am requesting \$10,000,000 in punitive damages

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

\_\_\_\_\_  
(Name of Person who prepared or helped  
prepare this complaint if not Plaintiff)

1

\_\_\_\_\_  
(Signature of Plaintiff)

April 12, 2009

\_\_\_\_\_  
(Date)

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(Additional space if needed; identify what is being continued)