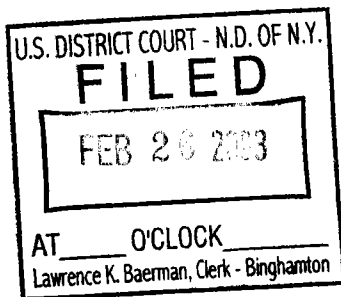


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

13
MA

Tonya R. Powell,
Plaintiff



Civil Action No: 3:02-CV-1605

v.

AMENDED

American General
Beneficial
BSB Bank
Charter One Bank
Citifinancial
HSBC Bank
M & T Bank
NBT Bank,

Defendants

COMPLAINT

- (1) Violation of State and Federal Banking Laws and Statues 912CFR202 &226 (Reg B & Z) (Fair Lending Laws and Credit Discrimination)
- (2) Violation of the United States Constitution (1791) 7th,9th,10th, 14th,15th Amendments (denial)
- (3) Violation of the Civil Rights Act of 1968
- (4) Violation of Equal Credit Opportunity Act (15 U.S.C. 1691-1691(f))
- (5) Violation of 7th Amendment (Right of trial by jury) Demand For Jury Trial
- (6) Violations of the Community Reinvestment Act of 1977 (12 U.S.C. 2901-2906)



Comes now the Plaintiff in the named case as alleges as follows: This action is brought by the Plaintiff "Powell" to enforce the Provisions of the Title VIII of the Civil Rights Act of 1968, Equal Credit Opportunity Act ,15 U.S.C. 1691-1691(f) Community Reinvestment Act of 1977 (12 U.S.C. 2901-2906), United States Constitution (1791) Violations of the 7th, 9th, ,14th,15th Amendments. Violations to Comply with State and Federal Banking Laws Regulations (B & Z) .

This court has jurisdiction pursuant to 42 U.S.C. 3614,and 15 U.S.C. 1691 (h).

1. At all times herein, Plaintiff "Powell" was a resident of the County of Broome, State of New York, and resided at 60 Court Street,. City of Binghamton.
2. At all times herein , American General, Beneficial,BSB Bank, Charter One, Citifinancial, M & T Bank, NBT Bank Defendants is a federally insured bank doing business in the State of New York . Their business includes regularly extending credit, including personal and commercial loans. The bank also extends credit for home improvement, purchase for mobile home loans which are residential real-estate related transactions as defined in the Fair Housing Act, 42 U.S.C. 3605 (b) (1). As a federally insured lending institution (Banks) is subject to federal laws governing Fair Lending, including the Equal Credit Opportunity Act, the Fair Housing Act, and the Community Reinvestment Act of 1977 (12 U.S.C. 2901-2906). The Community Reinvestment Act ,12 U.S.C. 2901 et seq., and its implementing regulations,12 C.F.R 354 seq., require Defendants to meet the credit needs of the entire community in which it operates, including the credit needs of low-to-moderate income areas in the community.
3. The Defendant(s) American General branch in Vestal headquarters Indiana,

- (2) Beneficial branch in Vestal headquarters in Chicago, BSB Bank branch in Binghamton, NY headquarters in Binghamton, NY. 3. Charter One Bank branch in Binghamton, 4. Citifinancial, branch in Johnson City and Endicott, Headquarters in Baltimore, MD, (5) HSBC Bank locations in Binghamton, headquarters in Buffalo, NY (6) M & T Bank branches in Binghamton and Endicott headquarters located in Buffalo. (7) NBT branches in Port Dick and Maine , NY headquarters in Norwich.
4. Plaintiff had applied to all of the above named defendants for credit business, personal and a home mortgage loan all were denied no second review. Explanation given No credit, No collateral, Co-signer.
5. The Plaintiff "Powell" does believe the above banks did not want to work with her is because of her gender and skin color. Upon the Plaintiff 'Powell' asking for another review the decision did not change.
6. Banks for years have been getting away with "unfair business practices". The practice is a continuance from the illegal business practice they used in the early 1900's to keep negroes from obtaining home loans and from voting. If whites did allow negroes to buy home they were the shabbiest homes and paid outrageous prices (higher interest rates). The insurance coverage on the homes was twice that of whites.
7. The defendants continue to deny access of life, liberty , and property to individuals and families of African descent. Denying them expectancy of "economic advantage or benefit.

8. The right for the Plaintiff "Powell" to pursue a lawful business, property, or anything else she is entitled to enjoy the fruits and advantages of one's industry and efforts are rights which the law protects against unjustified and wrongful interference by another person.

10. The constitution of the United States is the 'Supreme " law of the land" and is itself a law for which it is the duty of all the courts " high and low" , both state and national to sustain and enforce as they do all other laws. Even if wording of law or ruling is constitutionally correct, if it is not applied equally it is unconstitutional.

11. The First Amendment , including specifically the right to petition the court, is incorporated against the states by virtue of the Fourteenth Amendment.

12. The judiciary Act of 1789 provides that: In all courts of the United States the parties may plead and conduct their own cases personally or by counsel as by the rules of such courts, respectively, are permitted to manage and conduct cases therein, 28 U.S.C.1654 this ancient protection is rooted in the fundamental principles of our jurisprudence. The right to proceed pro se is a fundamental statutory right that is afforded the highest degree of protection in which Plaintiff 'Powell" brings this civil action.

13. The business practices of the defendant(s) are and always have been illegal for many years.

14. Defendants counsel may argue that these laws do not apply to the banking system.

15. The Ninth Amendment states; "Rule of Construction" of the constitution.
That no natural rights are abridged merely because they were not enumerated in the preceding eight amendments of the 'Bill of Rights" by the people.
16. The banking system has artfully ,dexterous in doing business secretly or cunning in evading detection by denying African-Americans access to credit and the economic up climb for many years. Their actions are very selective.
17. It was not until the ratification of the 14th Amendment that Federal Courts were granted a weapon to enforce many of the guarantees stated in the first ten amendments upon state jurisdictions.
18. Opening the book on lending discrimination is nothing new. Many years explicit discrimination in mortgage, business, auto lending was and always have been a broader pattern of racial discrimination. The early 1900 in segregation banks would not loan money to blacks for home , auto , personal loans. Even insurance coverage the interest rates were outrageous.
19. Discrimination against people of color by lenders has been a long-standing civil rights concern as well as a constitutional concern in the United States. Both Title VIII of the Civil Rights Act of 1968 and the Equal Credit Opportunity Act of 1977, commonly called the 'Fair Lending Laws" prohibit discrimination against applicants who apply for credit if their race is not white.

20. To the court. What damage has the Plaintiff 'Powell' sustained? The Plaintiff 'Powell's Debt to ratio was not a problem the loan request were not large, and the Plaintiff 'Powell Would have been able to pay the loan back.
21. Plaintiff ' Powell" is of a protected class under the Civil Rights Act of 1964. A woman Who is African-American.
22. The Plaintiff 'Powell ' applied for a loan from American-General on or about January 6th, 2003 the loan was denied.
23. The Plaintiff " Powell applied for a loan from Beneficial on or about January 22, 2003 The loan was denied.
24. The Plaintiff Powell" applied for a loan and a charitable donation from BSB Bank On or about January 21th, 2003 both were denied.
25. The Plaintiff Powell " applied for mortgage loan from Charter One Bank on or about February 5th 2003 the loan was denied.
26. The Plaintiff "Powell" applied for a Personal loan from Citifinancial on or about February 10th ,2003. loan was denied.

27. The Plaintiff 'Powell' applied for a business expansion loan from HSBC Bank on or about November 4th, 2002 loan was denied.
28. The Plaintiff 'Powell' applied for a business expansion loan from M & T Bank on or about January 2nd, 2003 loan denied
29. The Plaintiff 'Powell' applied for a business expansion loan from NBT Bank on or about January 17th, 2003 loan denied
30. The defendants never considered the information the Plaintiff 'Powell' submitted, never considered her debt/ratio. The Plaintiff 'Powell' truly believes there was economic Discrimination and statistical discrimination.
31. The defendants know as well as the Plaintiff "Powell" as a matter of statistical discrimination African - American small business owners face or have bankruptcy rates that were at least double those of white business owners. The rate is high due to the covert practices of those who work in the banking industry holding on to the wrong perceptions about the credit risk of people of color and not realizing they are the cause of the high rate of faltering businesses in the Community of color.
32. If the Plaintiff "Powell" cannot obtain capital or access to credit soon, she will become another who will be delinquent on personal and business obligations. This only happens merely, the covert thinking of individuals that companies hire who think less of people who are not white. Because of this, African-Americans will be in the category of legal judgments, delinquency payments, bankruptcy, slow payments etc. This is all due to the deprivation of equal access to credit or capital. In which the defendants have done quite well. They must stop the covert economic and statistical discrimination and denying individuals like the Plaintiff equal access to credit or capital.

33. Webster dictionary defines discrimination ("to make a difference in treatment on the basis of Other than personal merit. Simply said it means treating people differently . Plaintiff " Powell Understands not all discrimination is illegal.
34. Discrimination is the arbitrary denial of an individuals ability to succeed based on someones Perception of a group's inferiority or risk. This is what the banking system has done and still Doing. The individuals who are employed by the defendants their covert motives it is Perceived superiority of one group over others that is at the core of discrimination.
35. These types of perceptions do much damage to the Plaintiff 'Powell' and others who similarly Like her
36. If the defendants are not willing to allow or even bail buasinesses of color out, therefore they Will fall into the risk base category, due to the lack of access to capital or credit. In which Many business of color have had to literally struggle on their own, in this case this is what The Plaintiff ' has done for years, not being given the opportunity to even expand.
37. The Defendants actions violate the basic belief that everyone given the opportunity to succeed. Once we begin accepting reasons to discriminate , then who decides what reason is acceptable And who will be discriminated against. No one wants to be the receiving end of discriminatory Behavior. It has always been people of color who have been at the receiving end.
38. Plaintiff 'Powell' has received that discriminatory end.
38. Plaintiff ' Powell ' feel she has been victimized by the defendants and files her grivance with this court. The Plaintiff ' Powell " believes the actions of the defendants have violated her 'Constitutional Rights' under the law.

39. The defendants have deprived liberty to obtain economic rights to be able to support one self in Business as well as ones household.
40. The defendants must understand that equal protection is not about leveling the playing field by Turning everyone to clones. It's about maintaining decent social stratification system which allows As many people as possible to achieve their fullest potential. The Plaintiff 'Powell' cannot reach this Full potential due to the defendants social bias of a underclass.
41. Denial rates have always been higher for blacks than whites mainly in a protected class in which the Plaintiff is protected under.
42. It has been stated and documented in the Federal Financial Institutions Examination Council National Survey of Small Business Finances, Department of Justice, HMDA, black businesses Had a higher denial rate 2 1/2 times the rate of white business owners. The standard for fair lending In the Binghamton and Broome County area is haphazard.
43. The courts can see that the Plaintiff 'Powell' has applied to most of the banks in the area and all have Not given a second look or a counteroffer for any of the loan request the Plaintiff 'Powell' has Applied for.
44. Plaintiff " Powell" disparate treatment is because she is black or African-American. The disparate Impact comes when the Plaintiff 'Powell' has applied for a loan may receive equivalent treatment But the lending policy has a disparate effect on her and others similarly situated.
45. The Plaintiff 'Powell' applied for small loans In which low value loans are rejected more frequently. Under a minimum loan amount policy.
46. To the court it must be recognized, the Plaintiff 'Powell' has been subjected to discriminatory Conduct that is subtle or masked. The individuals the Plaintiff 'Powell' has encountered will not Openly admitt their covert perceptions they have of someone to be considered a sub species. They will not admit they are motivated by bias or prejudice, and discrimination is often Accomplished through indirect means. Since it is often difficult to prove the unspoken motive.

47. The defendants will assert an ostensibly non discriminatory reason to justify discriminatory acts or Practices. The defendants will attempt to show reasons why a rejection was in accordance with some Legitimate nondiscriminatory policy.
48. The Plaintiff petitions the court to investigate circumstances surrounding the purported reason, Including an analysis of the class impact of that reason as well as the business purpose it allegedly Serves. It is relevant in examining for "pretextual discrimination , to consider an institution's General policy and practice with respect to blacks , as well as the historical backgrounds of the Decisions or practice in question.
49. This question is presented to the court. "Why" is it, so many black businesses and mortgage loans Are either defaulted on, or denied and many become bankrupt, judgments, late payments, etc?
50. The defendants have not improved their lending laws in which all of this can be shown at trial in Statistical data. The defendants lending laws to avoid charges of "purposeful " discrimination the Defendants must exercise a reasonable degree of precaution and self - examination.
51. Plaintiff " Powell" realizes the defendants may regularly deal with many people in the course of Extending credit. The defendants rely upon information supplied by credit bureaus, appraisers, brokers and their own employees may contribute substantiantially to a final decision about the applicants credit -worthiness. The defendants employees can cause the defendants to be liable for their discriminatory practice if members of a protected class are as a matter of practice subject to more stringent or onerous requirements. The Plaintiff 'Powell" believes this has happened to her.
52. The defendants rely on much information from their front line credit officers also known as loan Officers and their subjective evaluation. The Plaintiff " Powell " does believe the actions of the Defendants employees were bias and none of them considered the 'Plaintiff "Powell' application.
53. The Plaintiff 'Powell" need for financing is a critical and pernnial concern for small business owners Indeed. Few things are as crucial to the health of a small business operation. The Plaintiff 'Powell's Small business is launched by the personal resources she has put in the business.

54. The Plaintiff 'Powell ' economic resources can quickly reach the stage where she must look to the Credit market for financial help in expanding operations . Sometimes not wanting to ask for Assistance for the credit market for fear of rejection in which this is exactly what has happened. The Plaintiff 'Powell' was looking for help and was turned down causing the Plaintiff 'Powell ' Much emotional distress and mental anguish. The ' Plaintiff "Powell" is trying to keep her Business going. But if the business should fail, it would not be the Plaintiff Powell's lack of Mismanagement, it would be due to the deprivation, denial, and the covert discrimination of The banking system not allowing equal access to credit or capital.
55. The Plaintiff 'Powell ' petitions the court to "stop " this unequal treatment in the banking system. The banking system is not being asked to make unsound loans, what they are being asked is be Equally fair. There is a gap in denial rates to reduced flexibility on the part of lenders when Confronted with less than perfect people of color applications afflicted with imperfections relative To that for white applications also afflicted for the same imperfections.
56. The defendants review income , credit histories, and other relevant components of "creditworthiness" are correlated with racial characteristics is acknowledged widely. The Plaintiff 'Powell has been impacted with hidden covert discrimination. The defendants Can be induced to discriminate against members of a given population group in ways Indistinguishable from those practiced by the most vehement advocates of racial hierarchy.
57. The Plaintiff 'Powell has faced "economic discrimination" by the banks in this civil case. Overall The statistical evidence and other information presented or will be presented will indicate that Blacks face a significant disadvantage in the market place. The defendants practices range from the Obvious to subtle and from prejudice to ignorance of the law. Whites are given second chances With blemished credit, people of color are not. Whites with good credit receive loans, people of Color with good credit do not, or if they do are charged higher rates.

58. The lending practices of the defendants discriminatory intent or application still have disparate Impacts on the Plaintiff 'Powell' and other like her. The defendants know "credit history" Information on applicants- a key element in lending decisions -did not have to be reported to Federal regulators so it couldn't be evaluated."
59. The defendants did not consider the information the Plaintiff "Powell " did submit. The monies Generated came from the hard work of the Plaintiff 'Powell' without the assistance of the banking System. " There does come a time when businesses or individuals will need the assistance of The banking system. When the Plaintiff 'Powell' does turn to the banking system for assistance In credit or capital, she still is perceived by the defendants as a risk in lending in which they Still compare my race with creditworthiness.
60. The Plaintiff 'Powell' continues to be damaged by or a adverse impact of the decisions the defendants Have made. The Plaintiff 'Powell' is of a protected class. The defendants do correlate race with Creditworthiness. The defendants do not give people of a protected class the opportunity rather their Credit is good, nor do they give them a second chance with blemished credit even if it was three, five, Ten years or more. The reasons are long, and their practice of deprivation of property, sustaining a Business must stop! The Plaintiff 'Powell' petitions the court for racially discriminatory practices And policies the defendants so rightfully protect.
61. The Plaintiff 'Powell' will prove at trial the disparate impact the defendants have done to the Plaintiff 'Powell' and others similarly situated. Denial rates for small business credit market is considerably larger than that found in the mortgage market. Blacks were denied business credit 26.9% compared to 65.9% for whites.
62. The defendants want to create damage to the Plaintiff 'Powell' by depriving her of liberty to be able to Enjoy the fruits of life.

63. The damage caused the Plaintiff 'Powell' is economic damage and emotional and mental damage.

No one can understand what an individual faces when they try to prevent oneself from losing a Business, or trying to obtain a home. If the Plaintiff 'Powell' is not able to obtain equal access To economic prosperity by being deprived of access to credit it will cause loss of income to sustain Her business. The money earned from the business is what sustains her in her home life, bills, car Payments, food, utilities, clothing, etc. If denial to credit or capital to sustain her livelihood is what Causes most businesses of color to fall in the area of bankruptcy, slow payments, delinquent accounts, Foreclosures, judgments, and other. The defendants know the cause and effect of what can and has Happened to individuals and communities of color the disparate impact it causes when the access to Credit or capital is deprived.

64. The practices of the defendants upon the Plaintiff 'Powell' is racially discriminatory policies and Practices were, and are intentional and willful, and have been implemented with reckless disregard For the rights of the Plaintiff 'Powell'.

WHEREFORE, Pursuant to Federal Rule of Civil Procedure 38(b) Plaintiff 'Powell' request that a jury Decide defendants liability under

1. Equal Credit Opportunity Act 15 U.S.C. 1691 1691(f) for the covert discriminatory practice of denial Or disparate treatment of access to capital or credit. Economic discrimination. Depriving Plaintiff ' Powell equal treatment or equal access to expand her business. In which based on statistical evidence Blacks are turned down disproportionately more than whites. Thus causing her economic restraint.
2. Violation of the Community Reinvestment Act of 1977 (12 U.S.C. 2901-2906)
The defendants have not been adhering to this law, They have not been doing Business in the communities of color. The Plaintiff 'Powell ' is just one of them.
3. Violation of State and Federal Banking Laws and Statutes (912CFR202 & 226) (Reg B & Z) (Fair Lending Laws and Credit Discrimination).

Their practice of disparate access to fair lending of capital to individuals and credit discrimination they Have committed against the Plaintiff 'Powell'.

4. Violation of the United States Constitution (1791) 7th, 9th, 10th, 14th, 15th(denial).

The defendants will try to deny access to the courts preventing the Plaintiff 'Powell ' of the right of Trial by jury. The Plaintiff Powell ask of the court to be fair and impartial. The Plaintiff Powell's Natural rights should not be abridged because they were not mentioned in the preceeding eight Amendments. No state shall make or enforce any law which shall abridge the privileges, or Immunities of the citizens of the United States nor deprive life, liberty, and property. The Defendants practices have been doing this fopr many years, and now are denying the Plaintiff Powell of these protected rights. Some powers are reserved to the people of the United States. The 15th amendment was enacted to protect blacks for voting due to the illegal tactics whites would Use to keep blacks from voting i.e. (grandfather clause, poll tax, literacy). Today it is (bankruptcy, Delinquency, judgments etc.) even if it is three, five, ten years ago.

5. Violation of the Civil Rights Act of 1968

The right of all people regarding enjoyment of life, liberty, property, protection. The right To enjoy the benefits of a democratic society, such as equal access to credit or capital and Equal and fair treatment by the courts. The Plaintiff 'Powell 'petitions the court for protection From the covert disparate treatment the defendants have caused. The protection of the denial of Equal access to credit and capital, and the prtecton from the wrongs the defendants have Committed by denying the Plaintiff 'Powell the liberty she is entitled to.

59. The rate of People of Color is growing. It is just these entities (Banking) is choosing to ignore individuals and neighborhoods of color. The practice cannot continue.
60. The policies and practices described in the preceding paragraphs have achieved the intended racial impact, as demonstrated by statistics revealing the number of home mortgage applications, personal and business loans.
61. Other business practices utilized by the defendants at least until the Plaintiff "Powell" did her investigation, furthered the objective of servicing white residential areas and not servicing residential areas in which African-Americans reside.
62. The banking system continues to violate the Equal Credit Opportunity Act 15 U.S.C. 1691 (a) (1) discriminating against applicants with respect to credit transactions, on the basis of race, in violation of the ECOA 15 U.S.C. (1691) (a) (1).
63. Defendants policies or practices as alleged herein constitute:
- A. A pattern or practice of resistance to full enjoyment of rights secured by the Equal Credit Opportunity Act 15 U.S.C. 1691 e (h) and
 - B. A denial of rights granted by the ECOA, 14th Amendment and the 15th Amendment to a group of persons that raises an issue of general public importance.
64. Persons who have been victims of defendants discriminatory policies and practices are aggrieved in this instance it is the Plaintiff "Powell". Persons as defined in 42 U.S.C. 2602(i) and have suffered damages as a result of the defendants conduct an issue of general public importance.

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2. Enjoins defendants, their agents , employees, and successors, and all other persons in active concert or participation with them, from discriminating on account of race, in any aspect of their business practices;
 3. Require defendants to develop and submit to the court for its approval a detailed plan that (a) defines a service area for defendants business without regard to race and provides policies and procedures to ensure all segments of the defined area are served without regard to race, and (b) remedies the vestiges of defendants' discriminatory policies and practices;
 4. Award such damages as decided by a jury that would fully compensate the victim of defendants discriminatory policies and practices; and
 5. Defendants to actively participate in hiring more African-American in their place of employment, Funding and supporting programs and to work more with non-profit grass root organizations of color to assist in implementing programs to help African-American i.e. Housing Programs, Educational Programs, Entrepreneur Programs and more. To implement loan monitoring (second or Third Review) when a African-American applys for a loan.
 6. Award punitive damages in an amount to be determined by a jury to the victims of defendants discriminatory policies and practices; and
 7. Assess a civil penalty against each defendant, in order to vindicate the public interest.
- The Plaintiff "Powell" further prays for such additional relief as the interests of justice

65. The racially discriminatory policies and practices of defendants were, and are, intentional and willful, and have been implemented with reckless disregard for the rights of residents who are African-American.

66. Plaintiff 'Powell' declares that the totality of the policies and practices of defendants constitute a violation of title VIII of the Civil Rights Act of 1968, Violates the Equal Credit Opportunity Act, 1977, 15 U.S.C. 1691-1691(f) Violates Code of Federal Regulations (Fair Credit) (Regulation B & Z) (12CFR 202 & 226) Credit Discrimination, Violates the United States Constitution of (1791) (To guarantee the citizens basic individual liberties). Violation of the 7th Amendment (Right of Trial by jury). Violation of the 9th Amendment (no natural rights abridged merely because they were not enumerated in the preceding eight amendments). Violation of the 14th Amendment (no state shall make or enforce any law which shall abridge the privileges or immunities of the citizens of the United States nor deprive of life ,liberty, and property). Violation of the 15th Amendment (barring states from denying the vote to blacks (i.e. literacy, poll tax, grandfather clause and lynching). Today their denial to blacks is in the form of (i.e. bad credit, no credit history, lack of collateral, co-signer). There is no second chance for African-Americans. Failure to Comply with Applicable State and Federal Laws , Violation of Banking Regulation Laws.

WHEREFORE, Pursuant to Federal Rule of Civil Procedure 38(b) Plaintiff "Powell" request that a jury decide defendants liability under the Equal Credit Opportunity Act 15U.S.C. 1691 1691(f). and Violation of Banking Regulations under the Code of Federal Rules (Fair Credit and Credit Discrimination) (12CFR 202 & 12CFR226) (Regulation B & Z). and Violation of Title VIII Civil Rights Act of 1968, Violations of the U.S. Constitution Of 1791, Violations of the 7th,9th,14th, and 15th amendment. For the pattern or practice of racial discrimination alleged herein and the amount of damages owed to the victim of defendants discrimination.

Furthermore, the Plaintiff "Powell" request that the court issue an appropriate injunctive order, including a prospective remedial plan to correct the effects of defendants past discrimination and bring the defendants into compliance with Federal Fair Lending Law, and assess appropriate civil money penalties as to each defendant.

WHEREFORE, The Plaintiff "Powell" prays the court enter an order that:

1. Declares that the totality of the policies and practices of defendants constitutes a violation of Title VIII of The Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988,42 U.S.C. 3601-3619, Equal Credit Opportunity Act 15 U.S.C.1691-1691(f) , Violation of Banking Regulations under the Code of Federal Rules (Fair Credit and Credit Discrimination) (12CFR 202 & 12CFR226) (Regulation B & Z), Violation of The U.S. Constitution of 1791, Amendments 7th,9th,14th, and 15th, Failure to Comply with Applicable State and Federal Laws.

The Plaintiff Powell ask of the court to grant Compensatory Damages in the amount of \$ 150,000.00 to make the Plaintiff Powell whole.

The Plaintiff ask of the court for Emotional Distress \$ 50,000.00 for the mental unrest.

The Plaintiff ask of the court for Punitive Damages \$250,00.00 for the wrongs the defendants practice.

To grant the Plaintiff what is just and proper in the total amount of \$ 450,000.00 (Four-Hundred & Fifty Thousand Dollars.

For the court to grant what is just and proper for the Plaintiff. **DEMAND OF TRIAL BY JURY**

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