



BLACK LAWYERS FOR JUSTICE
Civil Rights Division
6305 Ivy Lane Suite #608
Greenbelt Maryland 20770

Phone: (301) 513-5445
Email: Attorney.Shabazz@blackrightsmatter.org
blackrightsmatter.org

**PLEA FOR PROSECUTION OF HATE CRIMES AND FEDERAL CRIMINAL
CHARGES AGAINST RANKIN COUNTY, MISSISSIPPI DEPUTIES FOR ACTS
COMMITTED AGAINST MICHAEL C. JENKINS AND EDDIE T. PARKER**

STATEMENT OF FACTS

1. On the night of January 24, 2023, six White Rankin County Sheriff's deputies illegally raided the private residence where Eddie Terrell Parker and Michael Corey Jenkins were lawfully residing. The deputies forcibly entered the residence, and they did not possess a valid warrant. According to eyewitnesses, the identity of these six officers included; Rankin Co. Miss. deputy Brett McAlpin, Rankin Co. Miss. deputy Christian Dedmon, and Rankin Co. Miss. deputy Hunter Elward.^{1 2}
2. Rankin County, Mississippi, is 73.5% White, 21% Black, according to 2019 data. Michael Jenkins and Eddie Parker were allegedly the only Black males residing within a two-mile area of the location of this occurrence.
3. Rankin County deputies forced their entry into the premises from several entry points without a warrant. The six deputies promptly subdued and handcuffed both Jenkins and Parker. At this point, nor at any point, did either victim ever resist, run away from, or

¹ Deputy Elward was also directly involved in the death of unarmed Damien Cameron in Rankin County, Mississippi, on July 26, 2021. Elward's photograph is included in Attachment 2; Exhibit 2

² Deputy McAlpin is pictured in Attachment 2; Exhibit 10

oppose the deputies in any way. Throughout this nearly two-hour occurrence, Michael Jenkins and Eddie Parker would completely comply with law enforcement.

4. While under Rankin Co. deputies' custody, Michael Jenkins and Eddie Parker were repeatedly and directly called "niggers" and "monkeys" and other specific racial slurs by these White officers. Upon entry, Rankin County deputies, including deputies McAlpin, Dedmon, and Elward, also accused the African-American men of "dating White women" and having committed other racial violations.³ Deputies intentionally and freely used random racial epithets during all actions described herein over the course of nearly two hours.
5. All six Rankin County deputies maintained complete control of both victims for the entirety of this nearly two-hour violent occurrence.
6. Without lawful cause or justification, in this severe event of police brutality, Rankin County deputies, including deputies McAlpin, Dedmon, and Elward, began punching and slapping their handcuffed African-American victims.
7. Throughout the nearly two-hour ordeal, Rankin County deputies would punch or slap the two handcuffed men at will, hurting and humiliating both Jenkins and Parker. Deputies also repeatedly and gratuitously kicked the men as if they were animals while they lay subdued and handcuffed.
8. In an escalation of their use of excessive force, the six deputies began firing Tasers on the handcuffed Michael Jenkins Eddie Parker. Throughout the course of this nearly two-hour use of force event, deputies would engage in a sadistic contest with each other as to which Taser would be most effective when fired against these two victims.⁴Deputies are

³ https://www.city-data.com/county/Rankin_County-MS.html

⁴ Please see Attachment 2; Exhibit 11; Eddie T. Parker Taser wounds

believed to have fired their Tasers 20-30 times on both victims.⁵ No cause existed for using unconstitutional force against the victims by the deputies.

9. No evidence indicates that the victims offered any resistance whatsoever that would justify initially, or at any point, being repeatedly Tasered while handcuffed by Rankin County deputies. Heavily redacted Taser reports received from Rankin County verify the timeline of this incident and support these allegations.⁶
10. Waterboarding Acts: During this prolonged torture session, with both men in complete custody and control, Mr. Jenkins and Mr. Parker were also subject to waterboarding techniques by Rankin County deputies, including deputies McAlpin, Dedmon, and Elward. Deputies tried to coerce the men, ostensibly to illicit a confession from the men in their custody.⁷
11. The items used to conduct the deputies' waterboarding acts were liquids obtained from the premises. Rankin deputies' waterboarded the men by placing the handcuffed men on their backs and pouring the liquids in their mouths and on their faces.
12. Sexual Acts: As if what has been stated herein is not outrageous enough, it is a confirmed fact that these six deputies, including deputies McAlpin, Dedmon, and Elward, attempted to use a dildo or sexual device against Mr. Jenkins and Mr. Parker in the course

⁵ Jenkins and Parker M.B.I. interviews

⁶ See Attachment 2 Exhibit 3.

⁷ Waterboarding, or "water torture," is a brutal practice whereby an interrogator straps a prisoner to a board, places a wet rag in his mouth, and by pouring water through the rag, induces controlled drowning. It is a paradigmatic torture technique that has long been considered a war crime; indeed, the United States has prosecuted enemy soldiers — and even U.S. troops — for engaging in the practice. Although this barbaric practice has been uniformly renounced by the United States and other nations committed to human dignity and rule of law, the technique has reportedly been used against terror suspects in C.I.A. custody in so-called "black site" prisons. (Source: American Civil Liberties Union).

of this torture session on 1/24/23. Photographic evidence confirms that a dildo or sexual device was used by deputies at the crime scene.⁸

13. Both victims, Terrell and Parker, informed the M.B.I. that deputies possessed the dildo; and they were attempting to use the sexual device on both of them; and that, but for the victims defecating on themselves; these sexual devices would have been inserted in their anal cavities by Rankin deputies.
14. On top of this outrage, in this period, the six Rankin deputies, including McAlpin, Dedmon, and Elward, in a very juvenile and bizarre manner, hurled eggs at the handcuffed men while calling them "niggers" and "monkeys." These eggs, which deputies threw, repeatedly hit both Jenkins and Parker and left residue and markings all over the walls at the crime scene⁹
15. In an effort to sanitize their acts, in the middle of this encounter, Rankin County deputies, including those individually named deputies McAlpin, Dedmon, and Elward, ordered both African-American men to strip naked and shower together. Incredibly, both men were forced by deputies to shower naked in the same shower stall, or they would face punishment by the six White deputies.
16. Threats to kill: During this prolonged kidnapping of Mr. Jenkins and Mr. Parker, Rankin County deputies repeatedly placed guns to the heads of both men and threatened to kill both of them. While pointing guns at their heads and threatening to kill them, viscous racial slurs such as "nigger" and "monkey" were used against Jenkins and Parker by deputies.

⁸ See Attachment 2 Exhibit 5

⁹ See. Attachment 2 Exhibit 6

17. Attempt to murder Michael Corey Jenkins: At the crescendo of this nearly two-hour torture session, on January 24, 2023, based on eyewitness testimony, a Rankin County deputy shoved his service weapon inside of Michael Jenkins's mouth while he was handcuffed.
18. The Rankin deputy spoke angrily to Michael Jenkins and then shot him inside his mouth. The Rankin County deputy intentionally shot Mr. Michael Corey Jenkins in the mouth, almost killing him.
19. The deputy's gunshot shattered Michael's jaw and severely lacerated his tongue. Several of Michael's arteries were severely damaged, and he almost died.
20. The shot Rankin County deputy fired his shot with malice aforethought, and he intended to kill Michael Corey Jenkins.
21. At no point in this occurrence did Michael Jenkins commit any act to warrant such cruel, physical, and deadly force to be used against him by Rankin County, Mississippi deputies.
22. Failure to aid Jenkins: Once the deputy shot Michael Jenkins in the mouth, he was left alone to care for and treat himself. After Michael was shot, Rankin County deputies McAlpin, Dedmon, and Elward would assist him in any way. For twenty or more minutes, each deputy consciously and deliberately disregarded their specific duty to render medical attention to Michael Corey Jenkins.
23. Michael would receive medical attention only when emergency medical personnel arrived. At the University of Mississippi Medical Center, Michael Jenkins finally received adequate medical care, which included multiple life-saving surgeries.¹⁰

¹⁰ As proof, a redacted copy of a portion of Michael Jenkins's emergency room medical records has been included as an attachment to this plea. (Att. 2; Exhibit 7. Also see crime scene Exhibits 10,11,12)

24. Despite their actions, Rankin County Sheriffs treated Michael Jenkins's mother, father, and advocates in an insulting and callous manner at the University of Mississippi Medical Center. Under the pretense that Michael Jenkins had committed crimes, Rankin law enforcement denied access to Michael Jenkins' parents while he was in intensive care and while critical medical decisions were being made. Only after said legal counsel got involved was Michael treated humanely by the Rankin County police department at UMMC.
25. Unfortunately, Michael Jenkins has suffered permanent cognitive damage, psychological damage, permanent disfigurement, and impairment. One side of his face suffers permanent nerve damage and numbness. Michael will be adversely affected for the rest of his life because of what racist deputies, including McAlpin, Dedmon, and Elward, under the color of law, wantonly have done in Mississippi.
26. Eddie Parker suffered injuries from his mistreatment and sought prompt medical attention. Mr. Parker was traumatized by a nearly two-hour torturous event and has suffered. Moreover, Eddie Parker shall suffer psychological damage due to these outrageous acts by Rankin County deputies.
27. Mr. Jenkins and Mr. Parker, in interviews with agents from the Mississippi Bureau of Investigation (M.B.I.), confirmed both victims' accounts that all six deputies jointly participated and encouraged each other in these outrageous and criminal acts.¹¹
28. Failure to intervene: None of the other five officers, including deputies McAlpin and Dedmon, intervened [in word or action] to stop Michael Jenkins from being shot by the specific Rankin County Deputy who shot him. Not a single deputy, at any point,

¹¹ Michael Jenkins 4/6/23 interview with Mississippi Bureau of Investigation.

objected or took any affirmative action to stop any of their fellow deputies from inflicting the pain and punishment that was inflicted on Michael Jenkins and Eddie Parker for nearly two hours.

29. In the course of this tragic melee, no single Rankin deputy chose to withdraw from this prolonged, twisted, and sick event. In fact, the contrary is true; each deputy consciously, knowingly, and willingly participated in the torture, beating Taser, and sexual exploitation of both handcuffed victims and the ultimate shooting of Michael Jenkins by Rankin County deputies on 1/24/23.
30. Deputies consciously deprived Mr. Jenkins and Mr. Parker of their constitutional rights;
(1) Each law enforcement officer had a realistic opportunity to intervene and prevent the harm (2) the officers knew the victim's constitutional rights were being violated, and (3) the officers did not take reasonable steps to intervene.
31. Therefore, all Rankin deputies are criminally responsible for the attempted murder of Michael Jenkins and all criminal acts committed against both victims.
32. False Charges/ Obstruction of Justice: Counsel has sound reason to proffer that deputies attempted to concoct evidence, in this case, to frame the victims and ensure their silence after this rogue incident.
33. Initially, Rankin County Sheriff's Department, via the Mississippi Department of Public Safety (MDPS), falsely claimed that Michael Jenkins had a gun; but not since 1/25/23 has this claim been advanced.¹²
34. Additionally, after he was shot, Jenkins told the M.B.I. that Rankin deputies threw down a stock barrel from a B.B. gun near his feet to justify the shootings.¹³

¹² See Exhibit 8: 1/25/23 Statement on this incident by the Mississippi Department of Public Safety.

¹³ Michael Jenkins 4/6/23 interview with Mississippi Bureau of Investigation.

35. Rankin deputies stole the computer hard drive that controlled the video monitoring system on the premises to cover up their misdeeds, which contains direct evidence of their actions on 1/24/23.
36. Criminal charges are not expected to proceed against either victim, according to the M.B.I., However, the fabrication of false charges against victims to cover up acts of police brutality is a systemic problem in Rankin County, Mississippi, under the leadership of Sheriff Bryan Bailey. According to many calls and emails that we have received from African-American residents, police misconduct, cover-ups, and police brutality are a part of life for Blacks in Rankin County, Mississippi.¹⁴
37. Failure to discipline/ reprimand. Ratification: Under the leadership of Sheriff Bryan Bailey, the acts mentioned earlier committed have not warranted any cognizable reprimand of the deputies involved. Sheriff Bryan Bailey failed to discipline his deputies for this outrageous incident, and we believe they are still on duty today in Rankin County, Mississippi.
38. Sheriff Bailey's failure to discipline his officers only emboldens and encourages their brutality. This case is a prima facie example that racism, excessive force, failure to discipline, and ratification of racism and violence are systemic problems in the Rankin County, Mississippi, Sheriff's Department.¹⁵

¹⁴ Black Lawyers for Justice (B.L.J.) is initiating a formal civil/human rights investigation into the Rankin.

County Sheriff's Department's unconstitutional pattern and practices as a whole. B.L.J. will share its investigatory findings with the USDOJ-Civil Rights Division

¹⁵ Attachment 2; Exhibit 12; Sheriff Bryan Bailey

39. A USDOJ Civil Rights Department investigation into the Rankin County Sheriff's

Department is warranted. The USDOJ is mandated to ensure that all citizens living under Rankin County, Mississippi's jurisdiction's constitutional rights are protected.

**RECOMMENDATION TO FILE FEDERAL CRIMINAL CIVIL RIGHTS CHARGES
AGAINST RANKIN CO. MISSISSIPPI DEPUTIES**

Honorable Assistant Attorney General Kristen Clarke. It is our plea that a fair and reasonable-minded prosecutor would find that, on or about January 24, 2023, Rankin County, Mississippi, police officers violated the following federal civil rights criminal statutes:

- **Title 18, U.S.C., Section 249** - Matthew Shepard and James Byrd, Jr., Hate Crimes Prevention Act.
- **Title 18, U.S.C., Section 241** - Conspiracy Against Rights
- **Title 18, U.S.C., Section 242** - Deprivation of Rights under Color of Law
- **Title 42, U.S.C., Section 14141** - Pattern and Practice.

Title 18, U.S.C., Section 249 Matthew Shepard and James Byrd, Jr., Hate Crimes Prevention Act. This critical civil-rights statute states:

“[u]nlawful to willfully cause bodily injury—or attempting to do so with fire, firearm, or other dangerous weapon—when 1) the crime was committed because of the actual or perceived race, color, religion, national origin of any person.”

As documented in multiple interviews with the victims, the Rankin County officers, who were White, without a pretense of a warrant, after handcuffing and bounding their victims, repeatedly used racist terms such as “nigger” and “monkey” and other racial epithets toward Mr.

Jenkins and Parker. Rankin deputies committed these acts under the color of law, using physical force and violence to subdue Jenkins and Parker. Suppose any set of events qualifies for federal prosecution under Title 18, U.S.C. Sec 249. In that case, it is the events and\ occurrences of 1/24/23 by Rankin County, Mississippi deputies against Michael Corey Jenkins and Eddie Terrell Parker.¹⁶ Importantly, these disgusting events did not occur decades ago, as in the case of Emmett Till's murder in 1955. However, this racist holocaust is still perpetrated by law enforcement officers today, acting wantonly under the color of law against Blacks in Mississippi.

The James Byrd, Jr. hate crimes law provides for a maximum 10–year prison term unless death (or attempts to kill) results from the offense or unless the offense includes kidnapping or attempted kidnapping, aggravated sexual abuse, or attempted aggravated sexual abuse. In the instant case, factors including kidnapping, attempted kidnapping, and attempted aggravated sexual abuse exist, amplifying the need to prosecute these civil-rights crimes.¹⁷

Title 18, U.S.C., Section 241 - Conspiracy Against Rights. This significant federal civil rights criminal statute states it is:

¹⁶ The Department of Justice's policy is to value and preserve human life. Officers may use only the force that is objectively reasonable to effectively gain control of an incident while protecting the safety of the officer and others, in keeping with the standards set forth in *Graham v. Connor*, 490 U.S. 386 (1989). Officers may use force only when no reasonably effective, safe, and feasible alternative appears to exist and may use only the level of force that a reasonable officer on the scene would use under the same or similar circumstances. (Dept. Justice Policy on Use of Force; JM-DOJ)

¹⁷ Law enforcement officers and correctional officers of the Department of Justice may use deadly force only when necessary, that is, when the officer has a reasonable belief that the subject of such force poses an imminent danger of death or serious physical injury to the officer or another person. (Dept. Justice Policy on Use of Force; JM-DOJ 1.16.200)

[u]nlawful for two or more persons to conspire to injure, oppress, threaten, or intimidate any person of any state, territory, or district in the free exercise or enjoyment of any right or privilege secured to him/her by the Constitution or the laws of the United States, (or because of his/her willful injury, intimidation, or interference or attempt to do so, by force or threat of force of any person because of race, color, religion, or national origin....Punishment varies from a fine or imprisonment of up to one year or both, and if bodily injury results or if such acts include the use, attempted use, or threatened use of a dangerous weapon.....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 subject to imprisonment for any term of years or life or may be sentenced to death.

Title 18, U.S.C., Section 242 - Deprivation of Rights under Color of Law states:

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

Honorable Assistant Attorney General, leader of the Civil Rights Division of the United States Department of Justice, ample evidence exists herein, and via the Mississippi Bureau of

Investigation, that all of the necessary elements of the above civil rights criminal offenses occurred on January 24, 2023. In addition, the aggravating factors; [kidnapping; attempt to commit aggravated sexual abuse; and attempting to kill] are glaringly present in this Rankin County torture case against Michael Corey Jenkins and Eddie Terrell Parker. Michael Jenkins was shot in the mouth by a White deputy calling him racial slurs during his torture and detention.

A fair and reasonable-minded prosecutor can find probable cause exists for these crimes committed against Michael Corey Jenkins and Eddie Terrell Parker. The scourge of police brutality has intensified in America over the last decade, and the victims in this case pray and plea that the United States Department of Justice hold racist and rogue law enforcement officials accountable, lest the absence of prosecution emboldens similar actions by police all over the country. If the United States Department of Justice will not hold racist police officers accountable in 2023, who will?

**STATE CRIMINAL ACTS BY VIOLATED BY RANKIN COUNTY DEPUTIES
AGAINST MICHAEL JENKINS AND EDDIE TERRELL PARKER**

Honorable Assistant Attorney General: Probable cause exists for the following Mississippi state crimes the Rankin County Deputies committed in the Michael Corey Jenkins, Eddie Terrell Parker incident of January 24, 2023.

- **M.S. Code § 97-1-7 (2)** - *Attempted Murder Statute*
- **MS Code § 97-3-53** - *Kidnapping; punishment*
- **MS Code § 97-3-7 (2)(a)** - *Aggravated Assault*
- **MS Code § 97-3-95** - *Attempted sexual battery*
- **MS Code § 97-1-1 (2018) (a)** - *Criminal Conspiracy*
- *Other state criminal statutes*

PLEA FOR U.S. JUSTICE DEPARTMENT REVIEW OF COUNTY RANKIN
MISSISSIPPI SHERIFF'S DEPARTMENT UNDER BRYAN BAILEY

Title 42, U.S.C., Section 14141 - Pattern and Practice. This necessary civil rights statute was a provision within the Crime Control Act of 1994. It made it unlawful for any governmental authority, or agent thereof, or any person acting on behalf of a governmental authority, to:

[e]ngage in a pattern or practice of conduct by law enforcement officers or officials.... that deprives persons of rights, privileges, or immunities secured or protected by the Constitution or laws of the United States. This statute further declares, "Whenever the Attorney General has reasonable cause to believe that a violation has occurred, the Attorney General, for or in the name of the United States, may in a civil action obtain appropriate equitable and declaratory relief to eliminate the pattern or practice. Types of misconduct covered include, among other things: Excessive Force, False Arrest, Coercive Sexual Conduct; Unlawful Stops, Searches, or Arrests."

A pattern and practice of police misconduct and police brutality exist in the Rankin County, Mississippi, Sheriff's Department, headed by Sheriff Bryan Bailey. Adding insult to all the events described in this statement of facts, false police reports and affidavits were generated by these deputies, which attempted to cover up their actions and frame the victims here. Rankin County has disciplined or terminated no deputy, and all the deputies are still roaming the public. This ratification and assent of the deputies' actions by Rankin County Sheriff Bryan Bailey are the proximate cause of the multitude of criminal actions that occurred that fateful night of January 24, 2023.

The entire Rankin County Sheriff's Department is riddled with the corrupt mentality that racist actions under the color of law are acceptable. Rankin County conducts unconstitutional pattern and practices against African Americans. We plea that the United States Justice Department Civil Rights Division formally investigate the Rankin County Sheriff's Department, following suit on its essential, exemplary investigations into Ferguson, Missouri Police

Department and Louisville, Kentucky Police Department.¹⁸ Black Lawyers For Justice (B.L.J.) is an independent civil rights legal organization currently piloting these civil rights/ human rights investigations into Rankin County, Mississippi, and Lexington, Mississippi.¹⁹ We thank you for your attention to our Plea.

Respectfully submitted on 5/8/ 2023 by:

BLACK LAWYERS FOR JUSTICE (BLJ)

Malik Z. Shabazz Esq.

MALIK Z. SHABAZZ, ESQ.

The Law Office of Malik Z. Shabazz, Esq.

6305 Ivy Lane,

Suite 608

Greenbelt, MD 20770

Attorney.shabazz@yahoo.com

Tel: (301) 513-5445

(lead counsel)

Trent Walker Esq.

TRENT WALKER, ESQ.

The Law Office of Trent Walker

5245 Keele Street

Suite A

Jackson, Mississippi

39206

(Mississippi Local Counsel)

¹⁸ <https://www.justice.gov/opa/pr/justice-department-finds-civil-rights-violations-louisville-metro-police-department-and>

<https://www.justice.gov/opa/pr/justice-department-announces-findings-two-civil-rights-investigations-ferguson-missouri#:~:text=The%20Justice%20Department%20announced%20the,th%20Amendments%20of%20the%20Constitution.>

¹⁹ Re; Former Lexington Police Chief Sam Dobbins: <https://www.mississippicir.org/news/fired-lexington-police-chief-exposed-in-racist-recording-had-a-checkered-past-in-law-enforcement>

ENDORSED BY:

Donald M. Temple Esq.

Donald M. Temple, Esq.
The Law Office of Donald M. Temple
1300 L Street NW
#750
Washington, D.C. 20005

Fatima T. Johnson Esq.

Fatima T. Johnson, Esq.
The Law Firm of Fatima Johnson
3737 North Meridian Street,
Suite 106
Indianapolis, Indiana 46208

Reginald A. Greene Esq.

Reginald A. Greene Esq.
Greene Legal Group LLC
One Georgia Center
Suite 605
600 West Peachtree Street, N.W.
Atlanta, Georgia 30308