

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

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



May 8, 2023

To: United States Department of Justice
Civil Rights Division
Kristen Clarke, Esq.
Assistant Attorney General
900 Pennsylvania Avenue NW
Washington D.C. 20005

RE: Michael Jenkins; Eddie Terrell Parker
Rankin County Mississippi Sheriff's Department
(Bryan Bailey, Sheriff)
Date of violation: 1/ 24/ 2023

**PLEA FOR PROSECUTION OF HATE CRIMES AND FEDERAL CRIMINAL
CHARGES AGAINST RANKIN COUNTY, MISSISSIPPI DEPUTIES**

Dear A.A.G. Kristen Clarke:

On the night of January 24, 2023, on the heels of Tyree Nichols' nearby police beating death in Memphis, Tennessee, a shocking, criminal incident of police torture and excessive force occurred by the hands of six White Rankin County, Mississippi deputies against two African-American male citizens. This incident of severe police brutality is widely known in the national media and has justifiably aroused demands for justice from many quarters because this incident sets the standard for what is wrong with policing in America today.

The names of the African-American victims are Michael Corey Jenkins (32) and Eddie Terrell Parker (35). This vicious, nearly two-hour ordeal in Braxton, Mississippi, tragically ended with a Rankin County deputy placing his gun inside Michael Jenkins' mouth and firing it. Sheriff Bryan Bailey leads and supervises the Rankin County Sheriff's Department.¹ According to eyewitnesses, the identity of these six White officers included; Rankin Co. Miss. deputy Brett

¹ See Attachment 2; Exhibit 1: Michael Jenkins in the intensive care unit at UMMC after being shot by Rankin County Deputy
See Attachment 2; Exhibit 11: Rankin County Sheriff Bryan Bailey

BLACK LAWYERS FOR JUSTICE

Civil Rights Division
6305 Ivy Lane Suite #608
Greenbelt Maryland 20770
blackrightsmatter.org

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

McAlpin, Rankin Co. Miss. deputy Christian Dedmon, and Rankin Co. Miss. deputy Hunter Elward.² Rankin County, Mississippi, is 73.5% White, 21% Black, according to 2019 data.³

In the course of this nearly two-hour ordeal, while handcuffed and under the complete control of Rankin deputies, Michael Corey Jenkins and Eddie Terrell Parker were the victims of a series of criminal acts by these rogue officers, who, under the color of law, forced their way into their residence without even a pretense of any warrant. These acts by deputies included:

- Repeatedly beating Michael C. Jenkins and Eddie Terrell Parker while handcuffed;
- Repeatedly Tasing both victims while handcuffed;⁴
- Waterboarding both victims while handcuffed in the course of interrogation;
- Attempting to sexually assault both victims with a dildo (sexual device) in the course of detention;
- Having both victims strip naked and shower together in the course of interrogation;
- Hurling eggs at the victims;
- Threatening to kill both victims by pointing guns at the heads of both victims;
- Using racial slurs such as “nigger” and “monkey” and other racial accusations against the victims in the course of all actions described herein;
- Attempting to kill Michael Jenkins. A White Rankin County Deputy placed his gun inside Michael Jenkins's mouth and shot him, attempting to kill him, severely and permanently wounding Jenkins.⁵

A complete Statement of Facts and Recommendation for Criminal Charges has been included under Attachment 1.

At no point in this encounter did either Michael Jenkins or Eddie Parker ever resist, run away from, or oppose the deputies in any way. Throughout this nearly two-hour ordeal, Michael Jenkins and Eddie Parker would completely comply with law enforcement.

While under Rankin County 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, Demon, and Elward, also accused the African-American men of “dating White women” and having committed other racial violations.⁶ Deputies intentionally and freely used random racial epithets for nearly two hours during all actions described herein.

² Deputy Elward was also directly involved in the death of unarmed Damien Cameron in Rankin County, Mississippi, on July 26, 2021. (See Attachment 2: Exhibit. 2)

Deputy McAlpin is pictured in Attachment 2; Exhibit 10

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

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

⁵ Please see Attachment 1; Statement of Facts, and Attachment 2; Exhibits 1-12

BLACK LAWYERS FOR JUSTICE

Civil Rights Division
6305 Ivy Lane Suite #608
Greenbelt Maryland 20770
blackrightsmatter.org

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

Initially, Rankin County falsely alleged that Michael Jenkins had a weapon. Since then, Rankin County has offered no proof to support its initial contention that they shot Michael Jenkins in self-defense. Instead, Rankin County, in typical fashion, has proceeded to engage in a blatant cover-up of this incident, refusing to release information on the investigation other than to supply limited, severely redacted reports.⁷

After considering all facts contained herein and in the attached Statement of Facts (Attachment 1) and Exhibits (Attachment 2), a fair and reasonable-minded prosecutor could conclude that, or about January 24, 2023, Rankin County Mississippi deputies and the Rankin County Sheriff's Department, violated the following federal criminal civil rights statutes and Mississippi state criminal laws:

- **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

- **Mississippi Code § 97-1-7 (2)** - Attempted Murder Statute
- **Mississippi § 97-3-53** - Kidnapping
- **Mississippi Code § 97-3-7 (2)(a)**- Aggravated Assault
- **Mississippi Code § 97-3-95** - Attempted Sexual Battery
- **Mississippi Code § 97-1-1 (2018) (a)**- Criminal Conspiracy
- Other state criminal statutes

Honorable Assistant Attorney General Kristen Clark, this specific case of police brutality and torture against Michael Jenkins and Eddie Parker is rapidly becoming known as one of the most notorious police brutality occurrences in this modern era, if not ever. Due to its peculiar facts and circumstances, this case qualifies as a D.O.J. Manual 8-3.130, *Case of National Interest*, and a DOJM Manual *High Profile Civil Rights Case*.

At no point were these African American victims running, resisting, or obstructing law enforcement in any way. If not for a miracle, Michael Corey Jenkins would be another dead victim of police brutality. The Rankin County, Mississippi deputies who committed state and federal hate crimes against Michael Corey Jenkins and Eddie Terrell Parker must be held accountable if the rule of law exists in Mississippi and the United States of America. Our plea, and the public demand, is that all rogue Rankin County deputies be swiftly indicted, arrested, and brought to justice.

As with the 1955 case of Emmett Till, we call on the federal government. Local and state actors will terrorize with hate and impunity if the federal government does not hold them accountable.

⁷ See Attachment 2; Exhibits 3 & 4

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

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

Addressing these types of violations is the crux of the mission of the United States Department of Justice Civil Rights Division.

Additionally, the facts stipulated and evidence presented herein and in the attachments to this letter warrant a United States D.O.J. civil rights investigation into the unconstitutional customs and practices of Rankin County, Mississippi, Sheriff's Department under the leadership of Sheriff Bryan Bailey.

Black Lawyers for Justice is thankful to the United States Department of Justice Civil Rights Division for consideration of our Plea for Criminal Prosecution.

Respectfully submitted on 5/8/ 2023 by:

BLACK LAWYERS FOR JUSTICE (BLJ)

Malik Z. Shabazz Esq.

MALIK Z. SHABAZZ, ESQ.

The Law Offices 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)

ENDORSED BY:

Donald M. Temple Esq.

Donald M. Temple, Esq.
The Law Office of Donald M. Temple
1300 L Street NW

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

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

#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

SENT VIA ELECTRONIC MAIL AND FIRST-CLASS MAIL TO:

The Honorable Kamala Harris
United States Vice President
1600 Pennsylvania Avenue NW
Washington, DC 20500
[Contact Us | The White House](#)

U.S. DEPARTMENT OF JUSTICE
Merrick B. Garland, Attorney General
US Department of Justice Civil Rights
Division
950 Pennsylvania Avenue NW
Washington, DC 20530-0001
askOCR@ojp.usdoj.gov

Kristen Clarke, Assistant Attorney General
US Department of Justice Civil Rights
Division
950 Pennsylvania Avenue NW
Washington, DC 20530-0001
askOCR@ojp.usdoj.gov

Jim Felt, Chief
US Department of Justice
Civil Rights Division – Criminal Section
950 Pennsylvania Avenue NW
Washington, DC 20530-0001
askdoj@usdoj.gov

Kilian B. Kagel, Chief
US Department of Justice – FOIA/PA
Branch
4CON, Room 6.153
950 Pennsylvania Avenue NW
Washington, DC 20530
CRT.FOIArequests@usdoj.gov

MS STATE ATTORNEY GENERAL
Attorney General Lynn Fitch
Mississippi Attorney General
550 High Street – Suite 1200
Jackson, MS 39201

BLACK LAWYERS FOR JUSTICE

Civil Rights Division
6305 Ivy Lane Suite #608
Greenbelt Maryland 20770
blackrightsmatter.org

lynn.fitch@ago.ms.gov

Catoria P. Martin, Esq.
City of Jackson Attorney
219 South President Street
Jackson, MS 39201
cmartin@jacksonms.gov

U.S. CONGRESS / SENATE

Bennie Thompson, Representative
US Congress
2466 Rayburn HOB
Washington, DC 20515
benniethompson@mail.house.gov

Bennie Thompson, Representative
US Congress
3607 Medgar Evers Boulevard
Jackson, MS 39213
benniethompson@mail.house.gov

Cindy Hyde-Smith, Junior Senator for
Mississippi
State of Mississippi
702 Hart Senate Office Building
Washington, DC 20510-2405
anna_pittman@hydesmith.senate.gov

Cindy Hyde-Smith, Junior Senator for
Mississippi
State of Mississippi
190 East Capital Street – Suite 550
Jackson, MS 39201
anna_pittman@hydesmith.senate.gov

Roger Wicker, Senior Senator for
Mississippi
State of Mississippi
425 Russell Senate Office Building
Washington, DC 20510
[Email Senator Wicker - U.S. Senator Roger Wicker \(senate.gov\)](mailto:Email Senator Wicker - U.S. Senator Roger Wicker (senate.gov))

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

Roger Wicker, Senior Senator for
Mississippi
State of Mississippi
U.S. Federal Courthouse
501 East Court Street – Suite 3-500
Jackson, MS 39201
[Email Senator Wicker - U.S. Senator Roger Wicker \(senate.gov\)](mailto:Email Senator Wicker - U.S. Senator Roger Wicker (senate.gov))

STATE / CITY ELECTED OFFICIALS

Governor Tate Reeves
State of Mississippi
550 High Street – Suite 19
Jackson, MS 39201
governor@govreeves.ms.gov

The Honorable Chokwe Antar Lumumba
Mayor, City of Jackson
219 South President Street
Jackson, MS 39201
calumumba@jacksonms.gov

Delbert Hosemann, Lieutenant Governor
State of Mississippi
Post Office Box 1018
Jackson, MS 39215
ltgov@senate.ms.gov

John K. Bramlett, Jr., District Attorney
20th Circuit Court District
211 E Government Street
Brandon, MS 39042
bubbabramlett@gmail.com

Clay Joyner, Acting U.S. Attorney
Northern District of Mississippi
United States Attorney's Office – Ethridge
Building
900 Jefferson Avenue
Oxford, MS 38655
clay.joyner@usdoj.gov

BLACK LAWYERS FOR JUSTICE**Civil Rights Division**

6305 Ivy Lane Suite #608

Greenbelt Maryland 20770

blackrightsmatter.org

Phone: (301) 513-5445

email: Attorney.Shabazz@blackrightsmatter.org

Michael Watson, Secretary of State

State of Mississippi

401 Mississippi Street

Jackson, MS 39201

secretary@sos.ms.gov

John Hawkins, Esq.

The MS Bar Board of Commissioners

7th Circuit Court District

407 East Pascagoula Street

Jackson, MS 39201

Doug Miracle, Civil Litigation-State of Mississippi

Crime Victim Compensation Division

550 High Street – Suite 1200

Jackson, MS 39201

doug.miracle@ago.ms.gov

John F. Hawkins, Esq.

226 North President Street

Jackson, MS 39201

State of Mississippi Commission on Judicial Performance

660 North Street – Suite 104

Jackson, MS 39202

mailbox@judperf.state.us.ms

Ann Regan Barlow

Rankin County Bar Association

Post Office Box 4371

Brandon, MS 39047-4371

annregan@mcinchlaw.com

Keith McCary, President

Mississippi Fraternal Order of Police

Post Office Box 282

Laurel, MS 39441

Ann Regan Bilbo Barlow

McNinch Law Firm PLLC

115 Laurel Park Cv – Suite 211

Flowood, MS 39232-8054

annregan@mcinchlaw.com

NATIONAL/STATE BAR ASSOCIATIONS

Lonita Baker, President

National Bar Association

1816 12th Street NW – 4th Floor

Washington, DC 20009

info@nationalbar.org

NATIONAL CIVIL RIGHTS GROUPS

U.S. Commission on Civil Rights

1311 Pennsylvania Avenue NW – Suite

1150

Washington, DC 20425

publicaffairs@usccr.gov

Washington Bar Association

Post Office Box 56551

Washington, DC 20040

Rev. Al Sharpton, National President

National Action Network

106 West 145th Street

Harlem, NY 10039

derekp@nationalactionnetwork.net

District of Columbia Bar Office

901 4th Street NW

Washington, DC 20001

executive.office@dcbar.org

John Barnett, President and Founder

True Healing Under God

8842 Avebury Drive – Suite H

Charlotte, NC 28213

nancharlotte@yahoo.com

The Mississippi Bar

643 North State Street

Jackson, MS 39202

BLACK LAWYERS FOR JUSTICE

Civil Rights Division
6305 Ivy Lane Suite #608
Greenbelt Maryland 20770
blackrightsmatter.org

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

Priscilla Sterling, President
Emmett Till Justice for Families Foundation
2024 Mobile Avenue
Jackson, MS 39213
Sterlingpriscilla51@gmail.com

Dr. Cornel West
The Cornel West Academy of Excellence
9660 Falls of Neuse Road – Suite 138
Raleigh, NC 27615
cwspecialassistant01@gmail.com

Jarvis Dortch, Executive Director
ACLU – Mississippi
Post Office Box 2242
Jackson, MS 39225
office@aclu-ms.org

Joshua Tom, Legal Director
ACLU – Mississippi
Post Office Box 2242
Jackson, MS 39225
Jtom@aclu-ms.org

Janai Nelson, President and Direct Counsel
NAACP Legal Defense and Educational
Fund
700 14th Street NW – Suite 600
Washington, DC 20005

Angela English, President
NAACP Jackson
1072 J R Lynch Street – Suite 10
Jackson, MS 39203
Aenglish62@gmail.com

NAACP Biloxi Branch
610 Water Street
Biloxi, MS 39530

NAACP Gulfport
3312 Martin Luther King, Jr. Boulevard
Gulfport, MS 39501

NAACP
270 W. Peace Street
Canton, MS 39046

NAACP
4805 Mt. Hope Drive
Baltimore, MD 21215

Keisha Deonarine, Director
Opportunity, Race, and Justice
NAACP
4805 Mt. Hope Road
Baltimore, MD 21215

Dr. D. Tolson, President
NAACP
300 Lennox Avenue
Townson, MD 21286

Monica Woods, Executive Vice President
The Leadership Conference on Civil and
Human Rights
1620 L Street NW – Suite 1100
Washington, DC 20036

Maya Wiley, President and CEO
The Leadership Conference on Civil and
Human Rights
1620 L Street NW – Suite 1100
Washington, DC 20036

Derrick Johnson, President and CEO
NAACP
241 Peachtree Street NE
Atlanta, GA 30303

NAACP Legal Defense and Educational
Fund
40 Rector Street – 5th Floor
New York, NY 10006

Akosua Ali, President
NAACP Washington, DC Branch

BLACK LAWYERS FOR JUSTICE

Civil Rights Division
6305 Ivy Lane Suite #608
Greenbelt Maryland 20770
blackrightsmatter.org

100 U Street NW – Suite 100
Washington, DC 20001

NAACP Washington Bureau
1156 15th Street NW – Suite 915
Washington, DC 20005
washingtonbureau@naacpnet.org

Marc Morial, President and CEO
National Urban League
80 Pine Street – 9th Floor
New York, NY 10005
mmorial@nul.org

Dr. Portia Ballard Espy, President
National Urban League
2548 Livingston Road – Suite 1
Jackson, MS 39213
pbespy21@msurbanleague.org

Mississippi Center for Legal Services:
Center for Jackson and State Initiatives
Office
414 South State Street – Suite 300
Jackson, MS 39205-0951

Angela Groves, Esq., Staff Attorney
Opportunity to Learn Advancement Project
1220 L Street NW – Suite 850
Washington, DC 20005

Jesse Williams, Board Vice-Chair
Advancement Project
1220 L Street NW – Suite 850
Washington, DC 20005

Pamela Drake, President
Coalition for Police Accountability
339 15th Street
Oakland, CA 94612
oaklandcpainfo@gmail.com

Rashad Robinson, President
Color of Change

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

1714 Franklin Street – Suite 100
Oakland, CA 94612
oaklandcpainfo@gmail.com

Communities United Against Police
Brutality
4200 Cedar Avenue
Minneapolis, MN 55407
community.minneapolis@usdoj.gov

Bob Beard
Faith & Blue
2987 Clairmont Road – Suite 230
Atlanta, GA 30329
info@mapbdallas.com

Collette Flanagan, Founder
Mothers Against Police Brutality
2001 Ross Avenue – Suite #700-158
Dallas, TX 75201
info@mapbdallas.com

Rebecca Boyd
Circuit Clerk-Rankin County
211 E Government Street – Suite A
Brandon, MS 39042
rboyd@rankincounty.org

Jessica Massey
Justice Court Clerk-Rankin County
211 E Government Street – Suite A
Brandon, MS 39042
jmassey@rankincounty.org

John Shirley, Rankin County Prosecutor
Rankin County Chancery-Justice Center
201 North Street
Brandon, MS 39042
jmassey@rankincounty.org

Trey Spillman, Assistant County Prosecutor-
Rankin County
Rankin County Chancery-Justice Center

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

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

201 North Street
Brandon, MS 39042
presecutor@rankincounty.org

Bryan Bailey, Sheriff
Rankin County Sheriff's Office
221 Timber Street
Brandon, MS 39042

Jared Morrison-District 1 Board Member
Rankin County Board of Supervisors
211 E Government Street – Suite A
Brandon, MS 39042
jmorrison@rankincounty.org

The Jackson Association of Black Journalist
Post Office Box 11303
Jackson, MS 39283-1303
jabjinfo@yahoo.com

Daniel Cross-District 2 Board Member
Rankin County Board of Supervisors
211 E Government Street – Suite A
Brandon, MS 39042
jmorrison@rankincounty.org

The National Police Accountability Project
2022 St. Bernard Avenue – Suite 310
New Orleans, LA 70116
operations@npap@nlg.org

Brad Calhoun, District 3 Board Member
Rankin County Board of Supervisors
211 E Government Street – Suite A
Brandon, MS 39042
jmorrison@rankincounty.org

Keisha James, Esq., Staff Attorney – DC
The National Police Accountability Project
401 9th Street NW – Suite 800
Washington, DC 20004
keisha.npap@nlg.org

Steve Gaines, District 4 Board Member
Rankin County Board of Supervisors
211 E Government Street – Suite A
Brandon, MS 39042
jmorrison@rankincounty.org

Anti Police-Terror Project
aptpinfo@gmail.com

DeRay Mckesson, Executive Director
Campaign Zero
commuunity@campaignzero.org

Jay Bishop, District 5 Board Member
Rankin County Board of Supervisor
211 E Government Street – Suite A
Brandon, MS 39042
jmorrison@rankincounty.org

Coalition for Community Empowerment and
Police Accountability
CEPAcoalitionPGC@gmail.com

National News Stories on The Michael Jenkins / Eddie Parker Rankin County, Mississippi case

BLACK LAWYERS FOR JUSTICE

Civil Rights Division
6305 Ivy Lane Suite #608
Greenbelt Maryland 20770
blackrightsmatter.org

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

<https://apnews.com/article/mississippi-deputies-black-violent-arrests-61acf712b13fc3c77dce76e508fa94c1>

<https://apnews.com/article/politics-crime-michael-corey-mississippi-jackson-f2124de1424697f923f179d3be415340>

<https://newsroom.ap.org/editorial-photos-videos/detail?itemid=1f430b6e4fe24a778096083f60f1ee23>

<https://nypost.com/2023/03/27/mississippi-deputies-shot-off-suspects-tongue-routinely-used-excessive-force-study/>

[D.O.J. opens civil rights investigation after Black man shot in face by deputy - A.B.C. News \(go.com\)](#)

[\(37\) F.B.I. investigates Rankin County deputies who lawyers say left Michael Corey Jenkins in the hospital - YouTube](#)

[Michael Corey Jenkins: F.B.I. Launches Probe After Black Man Is Allegedly Shot in Face by Police - Capital B \(capitalbnews.org\)](#)

[Rankin County sheriff violated public records law by withholding incident reports, judge says \(wlbt.com\)](#)

<https://www.thedailybeast.com/mississippi-sheriffs-deputies-allegedly-shoved-pistols-in-mouths-of-2-black-men>

<https://lawandcrime.com/civil-rights/black-man-says-he-was-shot-in-face-waterboarded-by-White-deputies-in-mississippi-as-fbi-launches-civil-rights-probe/>

[Fundraiser for Mary Jenkins by Mary Jenkins: Lawyer fees and medical expenses \(gofundme.com\)](#)