

**No. 19-1422**

**U.S. SUPREME COURT**

**CLERK OF COURT**

**Honorable John G. Roberts, Jr.**

**Chief Justice**

NAKISHA JACKSON,

PETITIONER

V.

ROY L. BRUN, Judge; MIKE SPENCE, Caddo Parish Clerk of Court;

1ST JUDICIAL DISTRICT COURT; STATE OF LOUISIANA

AND

KRISTY WILSON, ET AL

RESPONDENTS

No. 19-cv-1006

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA,  
HONORABLE JUDGE ELIZABETH FOOTE

CASE No. 19-30828  
IN THE UNITED STATES COURT OF APPEALS  
FOR THE FIFTH CIRCUIT  
UNITED STATES DISTRICT COURT

NO. 20-00238  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

**SUPPLEMENTAL BRIEF**

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This supplemental brief is to inform the Court of new intervening matters not available at the time of this party's last filing of the Petition for Writ of Certiorari. On March 16, 2020, Federal Agent Charles Ladado, who I mistakenly called Donato in an earlier police report and thought was FBI, came to my office to question me about a message that Kristy Wilson said I sent to her (that was supposed to be a violation of the voided judgment). I proved the message was not from me, and Agent Ladado, his partner, and I discussed the fraudulent charity Kristy et al created in December 2018, to look like help for children, the homeless, and small business support. I gave Agent Ladado a copy of the confession where one of the participants said she needed a protective order against me because she helped Kristy et al. with the fake charity. He left with that understanding.

On July 6, 2020, I get a voicemail from Detective Karum of the Shreveport police department, Children's bureau, asking me to give him more information about the fraudulent charity. I thought he was legitimately investigating the fraud, so I called him back the first time, and told him everything he needed from me was already on the record. I gave him case numbers to assist. When he called the second time saying he had more questions, I immediately understood he was not doing what he said he was doing. The record is clear. He should not have any more questions for me, but he should have plenty for Kristy et al. He called a total of 6 times and

left 6 voicemails on 7/6, 7/7, 7/14, 8/4, 8/6, 8/7, and a text on August 7, 2020, as well. Then, I blocked him. I have them all. On those last calls and texts, he told me I needed to contact him immediately because he had issued two warrants for my arrest for violating protective orders from Dita Walker and Kristy Wilson. He said someone contacted him and said I contacted Kristy Wilson and violated my protective orders. I do not have protective orders. I have voided judgments, and I did not contact anyone. I was not worried about an arrest because I have voided judgments, no contact, and no violation. I had already told Mike Spence he would get his “court costs” when Judge Brun got jurisdiction over me. Louisiana does not have judgments at all, legally. Louisiana has open cases. All those cases have open motions. I paid the first time Kristy went to the court in 2019, even though it was void as well, but I was trying to avoid arrest for unpaid court costs. I paid it while I fought it. The next four times she and her criminal associates went to Brun that resulted in unanswered motions and formal notification of the wrong venue. Therefore, I have open cases, not judgments warranting court costs.

Prior to Kristy et al calling Detective Karum, I gave this detective’s number out publicly to advise those who donated they should contact him to recover their money, when I thought he was legitimately investigating a fraudulent charity. I believe she found that out and was really calling to see if he was real

because she had not been arrested. I am assuming no one had even questioned her about the fraud either because she was still reaching out to our tertiary associates representing the charity, as of September 2020. In the original request for a protective order she put the post where she asked for money in the evidence, and she was not registered to own, fundraise, or operate a charity in December 2018, when she first solicited the public for financial assistance. She never went to the police about the alleged harassment from me. She only went to the clerk of court. I filed the voicemail messages from Detective Karum with constituent services of the Office of the Attorney General, the Clerk of Court in Caddo Parish, and the Clerk of Court of the Louisiana Supreme Court. On Aug 7, 2020, I also filed and attempted to pay for a subpoena and subpoena duces tecum for Detective Karum to produce the evidence and witness testimonies that gave probable cause to issue warrants. However, according to the Caddo clerk employee, I did not pay enough money. When they realized I DID pay enough, they then said I did not have a court date to complete the request, Judge Brun would deny it, and I would still have to pay. Karum and Brun did not have evidence at the time of the “warrants” or the arrest. I believe Detective Karum, of the Children’s Bureau, initially was investigating the crime, so he thought. When he got to the record, I believe he panicked. Judge Brun sent him my way with limited information, and the record sent him in different direction. I requested the

evidence because I knew there was no evidence present because I did not contact those named in the writ.

Kristy Wilson and her associates have continued to stalk me while I await this case to come to conclusion. Someone initiated a law enforcement request to Facebook on June 30, 2020, for my personal information and locations. Kristy had means and motives and so did Judge Brun. I filed an injunction with the Louisiana State Supreme clerk to stop the invasion of my privacy due to no probable cause, no warrant, and my understanding that I was being stalked by Kristy and her affiliates because they were fearful that I had warned too many people about their fraud.

On Sept 26, 2020, US Marshall Charles Ladado magically appears to my place of business, again, with a different partner and 4 or 5 other officers from the Arlington city police department. I was in the middle of patient care and my business partner of the hospital was notified by hospital security that they entered the building. I was in the back with my patient, but my partner told me she came to my office to ask if she could assist, and Agent LaDado said no. She asked him who he was and what this was about. She understood he was an FBI agent, and he said to her he “would not have to be here had I turned myself in.” When I exited the patient treatment room, my business partner was gone, and my assistant tended to

wrapping up my patient's needs while I addressed the officers. They had no warrant. They had waited on me for about 15-20 mins, and we stood there for another 5 mins until they were able to produce it. Agent LaDado said it was from the city of Shreveport, and they were sending it over. I called the office of the Caddo clerk on speaker phone, in front of the officers, and asked if the warrant was real and the name of the judge that signed it. The clerk employee said it was Judge Brun. He cannot sign anything at this point, unless it is a resignation. He obviously does not understand the meaning of recusal. The problem is no other sane Judge will knowingly put her/his signature on anything Brun said I did. However, I went cooperatively.

In the squad car, the Arlington officer said they were present only because Ladado was a US Marshall, not an FBI agent, which makes more sense now, and he needed them for jurisdiction. There were no Texas charges, all Louisiana, and the officer could not even see the charges. Upon arrival at the Arlington city jail, none of my information was correct. My name was wrong on the warrant. It had no crime listed. I was finally told this was for violation of protective orders. I was booked by 1pm and awaited arraignment at 4 pm. The full amount for bail was posted 2 times on Aug 26, 2020, in time for both opportunities to be arraigned and released. I did not get called for the 4 pm arraignment, so the guard assumed I was scheduled for the 9 pm. He comes to

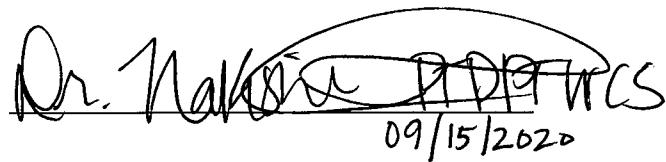
get me, and Judge Wendy Cooper says I am not on the docket because she just got an email that upped the charge from 2 violations of a protective order to now fugitive due to bench warrants. I asked to speak to my attorney in her presence. She sent me back to holding overnight. The next morning at 9 am, I was arraigned in Arlington city jail and signed a bond order for \$5000.00. Bail was posted and denied a 3rd time. By 11:30 am, Thursday Aug 27th, Arlington tells me they have no knowledge of bail posted, and I had to go to county. I was booked again and complete by 2 pm Thursday afternoon, in Tarrant County. I was held in general holding downstairs until 3 am Friday morning. Upon arrival to Pod C, cell 2, my cellmate informed me that this bed had been open since 12 noon on the day I arrived, Thursday. My attorney had attempted to see me around 2:30 pm on Thursday, and he was denied access because I did not have a cell assignment.

Later that Friday morning I had arraignment again and was notified that there was no bond now, and I had to be extradited. Officer Navarro said Shreveport was coming that day, but he was not sure if they would take me. I spent 5 nights in county. Caddo Parish came on Tuesday, September 1, 2020, to transport me to Caddo Parish Jail. I did not make it in time for afternoon arraignment there because we had to stop on the way because one inmate in tow had a medical emergency. The ambulance was called, and she was transferred to the hospital in Sunnyvale, TX.

I get to Caddo Parish and the intake clerk informs me the bond doubled, and she cannot find my criminal history. I also see the name of the Judge is changed to Tutt on one of the forms to allow bond. The other form had four items, as well, but all said no bond by Judge Brun. I spent the night in Caddo Parish jail for State voided judgments. The next morning, Wednesday Sept 2, 2020, I was arraigned again by 11:30am. This arraignment, also video, and just as interesting. Judge Dorrah confirmed my name, and then I was placed on mute. Two men approach the bench, one white and one black. They discuss something off the record for 2-3 minutes. They walk away from the bench and appear to exit the room. The video is unmuted, the counsel at the podium asks “Are we still off the record?”, and the video goes back silent. 1-2 minutes later the video goes back to sound, the judge asks me if I needed counsel appointed, and I said I already hired an attorney for the arrest. She acknowledged that, recited my new bond, and gave me a court date. My family posted bail and paid Caddo’s “court costs” before noon. I was released from Caddo parish jail after 7 pm. It is no coincidence my court date in Caddo Parish is scheduled for September 28 and September 29 is the date for the US Supreme court conference. It is no coincidence all of this came about as Kristy attempts to hold tight to the notion that she operates a charity, and she and Brun declined to comment to the US Supreme or the Louisiana Supreme Courts by the deadline. They also

declined to serve me notice of their attorneys and their intent to NOT submit a brief.

Wrongful conviction, wrongful arrest, illegal detention by the states of Texas and Louisiana, extortion, more perjury, harassment, and attempted intimidation by law enforcement can now all be added to this convoluted situation. Judge Brun and Kristy Wilson, et al cannot get to justice from manipulation and malicious intent, no matter how hard they try. I am not easily confused to allow myself to be manipulated. I am not easily broken. The notion that Judge Brun and Kristy think I can be held accountable for their crimes is absurd and delusional. They obviously will not stop on their own free will. The law is on my side, they understand that, yet they continue. Life is about choices, and they are making illegal and stupid ones.



Dr. NaKisha Jackson, PT, DPT, WCS  
09/15/2020

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