

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Lewis Brooks McKenzie, being duly sworn, hereby deposes and says:

1. I am over the age of 18 and am a resident of **Texas**. I have personal knowledge of the facts herein, and can testify completely thereto.
2. I suffer no legal disabilities and have personal knowledge of the facts set forth below.

PURPOSE OF AFFIDAVIT

1. This affidavit is submitted in support of a Criminal Complaint against Sgt Thompson, and other Deputies and Staff as yet unnamed; and
2. In support of each and every Inmate victim who experienced the gross abuses outlined herein.

BACKGROUND OF AFFIANT

I am a very politically active Public Speaker in Texas who has, for years, exposed corruption in our Texas courts and with our elected officials. I also hold a Bachelor's of Science in Psychology, a Master of Arts in Clinical Psychology, and a PhD in Developmental/Experimental Psychology, along with being extremely well-versed in the laws delineating appropriate conduct by Staff in jails/prisons.

STATEMENT OF FACTS

On December 20, 2023, I was arrested in Collin County for an Illegal Warrant issued without Jurisdiction by the corrupt Judges Kenneth Newell and Cherami Jenkins of the Tarrant County 233rd. After being arrested, I was transported to the Collin County Detention Center.

After witnessing the egregious and repetitive unlawful behavior of the Sheriff's Deputies, I requested an Inmate Grievance Form, but was denied said form until the next day. And each time I asked for an Inmate Grievance Form or a Federal Civil Rights Coversheet, I was asked "why" by the Deputies (a question that should NEVER be asked) and refused the forms I requested. I was only provided an Inmate Grievance Form after I threatened to file suit against the Sheriff's Department.

Below is a list of the criminal and amoral activity which I was a direct witness to and have personal knowledge of, and I assert that each if these acts were performed **knowingly and willingly** by the Sheriff Deputies and Staff identified, and those that have yet to be identified by name. Many of the crimes committed by Collin County Sheriff's Department Deputies and Staff can be found under PENAL CODE TITLE 8. OFFENSES AGAINST PUBLIC ADMINISTRATION ,CHAPTER 39. ABUSE OF OFFICE

Sec. 39.03. OFFICIAL OPPRESSION. (a) A public servant acting under color of his office or employment commits an offense if he:

- (1) intentionally **subjects another to mistreatment** or to arrest, detention, search, seizure, dispossession, assessment, or lien that he knows is unlawful;
- (2) intentionally denies or impedes another in the exercise or enjoyment of any right, privilege, power, or immunity, knowing his conduct is unlawful; or
- (3) **intentionally subjects another to sexual harassment.**

1. Sexual Harassment of female Inmate Trustee by Sgt. Thompson
 - i. A female Inmate Trustee (name as yet unknown) was repeatedly sexually harassed by Sgt. Thompson across a period of hours.
 - ii. No officer at any time intervened, and other deputies partook in said sexual harassment
2. Sexual Harassment of multiple females being booked into the jail by Sgt. Thompson
 - i. Multiple females awaiting booking were sexually harassed by Sgt. Thompson across a period of several hours.
 - ii. Sgt. Thompson made repeated comments about "sexy shoes", opening a "brothel and serving whiskey" because there were so many "hot women" in the jail (addressing the entire booking area and talking about females within hearing range), and overtly leered at and forced these females to interact with him, even taking said "sexy shoes" from one female and making jokes about how he (Sgt. Thompson) had the sexiest shoes now.
 - iii. No officer at any time intervened, and other deputies partook in said sexual harassment
3. Intentional instigation of conflict with Inmates who have serious Mental Health issues.
 - i. Throughout both shifts, day and night, Inmates with obvious Mental Health issues were targeted and harassed by multiple staff, for what appeared to be their own enjoyment.
 - ii. At least 2 separate inmates were repeatedly verbally abused and insulted by Deputies, who disregarding all training about de-escalation, intentionally escalated adverse and dangerous behaviors from these Inmates with Mental Health conditions.
 - iii. No officer at any time intervened, and other deputies simply ignored these Civil Rights Violations
4. Abuse of Inmates with serious Mental Health issues.
 - i. On numerous occasions Deputies interacted with Inmates who suffer serious Mental Health issues in an effort to cause serious mental, emotional, psychological, and even physical damage. This pattern was repeated across a period of many hours.
 - ii. No officer at any time intervened, and other deputies simply ignored these Civil Rights Violations.
5. Official Oppression and Abuse of Authority
 - i. Sgt. Thompson's disgusting behavior was certainly not the only violations, as numerous Sheriff's Deputies and Staff partook in similar behavior.
 - ii. Deputies openly threatened inmates, referred to them by racial and other slurs (on my way to be released, a Deputy called an inmate a "bitch ass nigger", and this was the norm).
6. An UNKNOWN Deputy relieved the Pod guard briefly after I had filed my first Inmate Grievance Form. This female, black Deputy who I had never seen before informed me that "We all know who you are" and referenced my previously submitted Grievance. This UNKNOWN Deputy openly talked about my Grievance and said the entire jail knew who I was now; a statement that was threatening and worrisome.
 - i. No one other than those investigating my Grievance should have any knowledge about my Grievance, who submitted it, or who I am. But such comments continued from numerous staff over the next few hours as I was being processed out of the Detention Center.
 - ii. Deputies repeatedly and overtly made comments to me about my Grievance, and even blamed me for inmates being released in such a hurry, claiming that they needed to get me "out of the jail as fast as possible". No Deputy in that process should have ever known anything about my Grievance, and this placed me in a very dangerous situation.