

**DODSON  
— HOOKS & RECEIVED  
FREDERICK SEC MAIL CENTER  
MAY 12 AM 11:45**  
A Professional Law Corporation

Kenneth H. Hooks, III

Kenny@dodsonhooks.com

May 7, 2008

Via Certified Return Receipt  
Office of General Counsel  
Federal Election Commission  
999 E. Street, N. W.  
Washington, D.C. 20463

MUR # 6011

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2008 MAY 12 P 1:12

Re: FORMAL COMPLAINT AGAINST DARREL GLASPER, "FRIENDS OF MICHAEL JACKSON", AND JOHN AND JANE DOES (Unknown individuals who were part of the scheme described herein and who provided funding to implement the illegal scheme)

Dear Counselors:

Complainant herein, Kenneth H. Hooks, III, is a resident of full age of majority of the Parish of East Baton Rouge, State of Louisiana, whose address is 17405 Perkins Road, Baton Rouge, Louisiana, 70810.

On Saturday, May 3, 2008, Louisiana held a special federal election to fill the 6th Congressional District seat that was left vacant by Rep. Richard Baker(R). The primary party election was held on March 8, 2008. The Democratic primary was hotly contested and the two (2) leaders in the primary were now Congressman Don Cazayoux (white male) and Louisiana State Representative Michael Jackson (African American male).

Congressman Cazayoux won the primary on March 8, 2008, and won the general election on May 3, 2008, by +/- 3000 votes against Republican Candidate Woody Jenkins and two (2) non-party candidates.

This complaint arises out of actions that took place on May 2, 2008 and during the morning of May 3, 2008 admittedly committed by Respondent Darrel Glasper, a Louisiana Resident, and a self proclaimed political activist.

Based upon information and belief, on the dates above, Respondent Darrel Glasper, representing himself as a group called "Friends of Michael Jackson" initiated mass telephone communications (commonly referred to as "robo-calls") to African American households asking African American voters to stay home and not vote in order to teach the Democratic Party a lesson.

28044214712

The language of the call is detailed below:

I'm very upset that the National Democratic Party favored Don Cazayoux from New Roads over Michael Jackson. The Democratic Party raised \$850,000 for Don Cazayoux which is the only reason Michael Jackson lost in the Democratic runoff. The National and State Democratic Parties always seem to back the white democrat over the black democrat and that's wrong. A lot of us who are supporting Michael Jackson feel the National Democratic Party need to be taught a lesson. We're not voting for Don Cazayoux because we believe Woody Jenkins will be a lot easier to beat in November when Senator Barack Obama is on the ballot. You haven't heard many black elected officials supporting Don Cazayoux. On Saturday we're going to stay home and see how the National Democratic Party do without us. Paid for by Friends of Michael Jackson.

On Saturday, May 3, 2008 at noon, I was notified of this situation and I immediately phoned Representative Michael Jackson who denied providing permission to any person or group to utilize his name for the purposes of the calls. Representative Jackson executed an affidavit swearing to the truthfulness of the above assertion. (See Exhibit "1"). Further, the undersigned researched the Louisiana Secretary of State's office for a corporate filing of an entity named "Friends of Michael Jackson" and found nothing registered.

That same day, complainant drafted and filed for a Temporary Restraining Order which ordered the calls to stop. (See Exhibit "2").

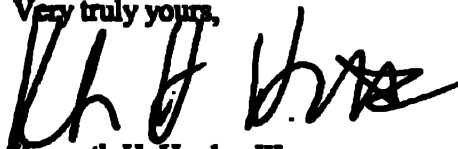
Based upon information and belief, during the filing of the Temporary Restraining Order, East Baton Rouge Parish Attorney Wade Shows made contact with Respondent Darrel Glasper wherein Glasper admitted to Shows that he was responsible for the calls and that said calls were in fact stopped earlier that day because he did not receive "promised funding" for the calls. (See Exhibit "3"). At this time, it is unknown to the complainant who or what entity was additionally involved in the funding of this fraudulent scheme.

On Monday, May 5, 2008, it was published in the Baton Rouge, Louisiana, newspaper, The Advocate, an article wherein it was reported that Respondent Glasper had again admitted responsibility for spearheading the deceptive scheme. (See Exhibit "4").

It is respectfully submitted that time is of the essence in this matter given that there are upcoming federal elections in this district on October 4, 2008 and November 4, 2008 and it is currently unknowable whether Respondent Glasper and his associates are planning on repeating their past actions.

28044214713

Very truly yours,

  
Kenneth H. Hooks, III

WITNESSES:

  
Printed Name: Jules Bauman

  
Printed Name: Brent Fendrick

SWORN TO AND SUBSCRIBED, before me, this 7<sup>th</sup> day of May, 2008.

  
Richard J. Dodson, Notary Public

Number: \_\_\_\_\_

My Commission Expires on: at death

28044214714

DALTON MAY 10  
LOUISIANA

Appearing herein, before the undersigned  
Notary Public Comes Representative  
Michael Jackson, DOB \_\_\_\_\_

Who, under Penalty of Perjury, declares

1. On May —, Affiant has been informed

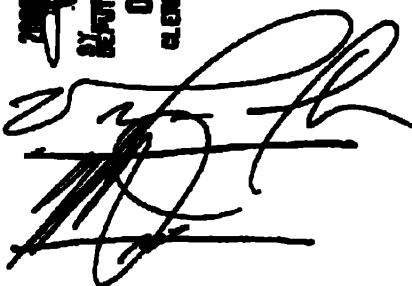
that ~~there~~ <sup>that</sup> many telephone calls are being made  
to ~~the~~ <sup>the</sup> Affiant's name,  
requesting that voters not vote today.


2. Affiant has not authorized the use of his  
for these purposes and supports all lawful attempts  
to stop these calls.

not further with Not.

  
Representative Michael Jackson

witness



  
Notary Public  
Alfred C. Williams

18th JUDICIAL DISTRICT  
EAST BATON ROUGE PARISH  
FILED

2008 MAY 10 AM 3:00  
BY CLERK OF COURT  
DOUG WILSON  
CLERK OF COURT D.R. MAHER

NOTIFIED BY MAIL

CLERK OF COURT

280044214715

SEC. 8

IN RE:

SUIT NO: 566654 DIV:

FRAUDULENT VOTER

19<sup>TH</sup> JUDICIAL DISTRICT COURT

SUPPRESSION

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

PETITION FOR TEMPORARY RESTRAINING ORDER  
AND INCORPORATED MEMORANDUM IN SUPPORT

COST OK TO ATT. #630  
#5005  
MAY - 3 2008

BY [Signature]  
DE CLERK OF COURT

NOW INTO COURT, comes, Christopher L. Whittington, in his capacity as Chairman of

the Louisiana State Democratic Party, who respectfully represents as follows:

1.

On or about May 3, 2008, petitioner became aware of mass telephone communications with Louisiana Voters requesting that said voters not vote in the Federal Election for 6th Congressional District.

2.

Based upon information and belief, said phone calls began on May 2, 2008.

3.

These calls have fraudulently invoked the use of Louisiana State Representative Michael



28044214716

Jackson's name in these phone communications with the specific intent to confuse Representative Jackson's constituents into believing that Representative Jackson was somehow affiliated with or supporting this request to attempt to disenfranchise Louisiana Voters in this Federal Election.

4.

Specifically, the contents of said calls is as follows:

...of New Roads over Michael Jackson. The Democratic party raised over \$850,000 for Don Cazayoux which is the only reason that Michael Jackson lost in the Democratic runoff. The national and state democratic parties always seem to back the white Democrat over the black Democrat, and that's wrong. A lot of us who are supporting Michael Jackson feel the national democratic party need to be taught a lesson. We are not voting for Don Cazayoux because we believe Woody Jenkins will be easier to beat in November when Senate Barack Obama is on the ballot. You haven't heard many black elected officials supporting Don Cazayoux. On Saturday we are going to stay home and see how the national democrat party do with out us. Pay for by Friends of Michael Jackson.

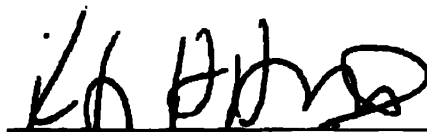
5.

Petitioner herein seeks an Order from this Honorable Court restraining any and all parties, whether it be individual or otherwise from the further use of representative Michael Jackson's name without his prior approval for the purposes of denying voters their constitutionally protected right to vote.

28044214717

Respectfully Submitted:

**DODSON, HOOKS & FREDERICK, APLC**



Kenneth H. Hooks, III,  
Catherine L. Plauche  
One Maritime Centre  
17405 Perkins Road  
Baton Rouge, Louisiana 70810  
Telephone: 225-756-0222  
Facsimile: 225-756-0025  
Email: Kenny@dodsonhooks.com  
Email: Catherine@dodsonhooks.com

VERIFIED TRUE COPY

017937

DEPUTY CLERK OF COURT

19th JUDICIAL DISTRICT  
EAST BATON ROUGE PARISH, LA.  
FILED

2009 MAY -3 PM 3:40

BY  DEPUTY CLERK & RECORDER

DOUG WELBORN

CLERK OF COURT E.B.R. PARISH

**CIVIL**

- |  |   |
|--|---|
| <input type="checkbox"/> 01-INITIALS                       | <input type="checkbox"/> 11-COMM. PROP. PARTITION |
| <input type="checkbox"/> 02-CONTRACT                       | <input type="checkbox"/> 12-PUBLIC SERV. COMM.    |
| <input type="checkbox"/> 03-PRISONER SUIT                  | <input type="checkbox"/> 13-OTHER PARTITIONS      |
| <input type="checkbox"/> 04-EXECUTION PROCEED              | <input type="checkbox"/> 14-OTHER                 |
| <input type="checkbox"/> 05-SUIT ON NOTES                  | <input type="checkbox"/> 15-RECEIPT               |
| <input type="checkbox"/> 06-ELECTION                       | <input type="checkbox"/> 16-                      |
| <input type="checkbox"/> 07-SPURIOUS CONFIRMATION          | <input type="checkbox"/> 17-                      |
| <input type="checkbox"/> 08-GENERAL REMEDY                 | <input type="checkbox"/> 18-                      |
| <input type="checkbox"/> 09-PROPERTY RIGHTS                | <input type="checkbox"/> 19-                      |
| <input checked="" type="checkbox"/> 10-INJUNCTION REMEDIES | <input type="checkbox"/> 20-                      |

IN RE:

**FRAUDULENT VOTER**

**SUPPRESSION**

\* SUIT NO: 5106,654 DIV: 8

\* 19<sup>TH</sup> JUDICIAL DISTRICT COURT

\*  
PARISH OF EAST BATON ROUGE

\* STATE OF LOUISIANA

---

VERIFICATION

STATE OF LOUISIANA

PARISH OF EAST BATON ROUGE

BEFORE ME, personally came and appeared, Christopher L. Whittington, who upon being duly sworn, did depose and say that he is the Petitioner in the foregoing petition.

That he is Chairman of the Louisiana Democratic Party, respectfully represents as follows:

That on or about May 3, 2008, he became aware of mass telephone communications with Louisiana voters requesting that said voters not vote in the federal election for 6th Congressional District.

That he, based upon information and belief, believes the phone calls began on May 2, 2008.

That these calls have fraudulently invoked the use of Louisiana State representative Michael Jackson's name in these phone communications with the specific intent to confuse Representative Jackson's constituents into believing that Representative Jackson was somehow affiliated with or supporting this request to attempt to disenfranchise Louisiana voters in a federal

28044214719



**Election.**


That the contents of said calls is as follows:

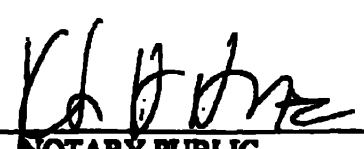
...of New Roads over Michael Jackson. The Democratic party raised over \$850,000 for Don Cazayoux which is the only reason that Michael Jackson lost in the Democratic runoff. The national and state democratic parties always seem to back the white Democrat over the black Democrat, and that's wrong. A lot of us who are supporting Michael Jackson feel the national democratic party need to be taught a lesson. We are not voting for Don Cazayoux because we believe Woody Jenkins will be easier to beat in November when Senate Barack Obama is on the ballot You haven't heard many black elected officials supporting Don Cazayoux. On Saturday we are going to stay home and see how the national democrat party do with out us. Pay for by Friends of Michael Jackson.

  
CHRISTOPHER L. WHITTINGTON

day of May 2008 at Baton Rouge, Louisiana. SWORN AND SUBSCRIBED before me, the undersigned Notary Public, on this 3<sup>rd</sup> day of May 2008

19th JUDICIAL DISTRICT  
EAST BATON ROUGE PARISH, LA.  
FILED

2008 MAY -3 PM 3:40  
BY   
DEPUTY CLERK & RECORDER FOR  
DOUG WELBORN  
CLERK OF COURT E.B.R. PARISH

Printed:   
NOTARY PUBLIC  
Bar Roll Number: \_\_\_\_\_  
My Commission Expires at Death

IN RE:

SUIT NO: \_\_\_\_\_ DIV:

FRAUDULENT VOTER

19<sup>TH</sup> JUDICIAL DISTRICT COURT

SUPPRESSION

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

**ORDER**

Having considered the Petition for Temporary Restraining Order,

IT IS ORDERED that any and all parties, whether it be individual or otherwise are restrained from the further use of Representative Michael Jackson's name without his prior approval for the purposes of denying voters their constitutionally protected right to vote.

IT IS FINALLY ORDERED that any and all parties, whether it be individual or otherwise, show cause, if any they can, on the 9th day of May, 2008 why a preliminary injunction should not issue to restrain any and all parties, whether it be individual or otherwise from the further use of Representative Michael Jackson's name without approval for the purposes of denying voters their constitutionally protected right to vote.

James Clark  
Judge, 19th Judicial District Court

19TH JUDICIAL DISTRICT  
EAST BATON ROUGE PARISH, LA  
FILED

2008 MAY -3 PM 3:49

CLERK OF COURT

DOUG WOODSON

CLERK OF COURT

STAMPED TRUE COPY

01-7939

DEPUTY CLERK OF COURT

9:36

28044214722

May 7, 2008

**To Whom it May Concern:**

On or about May 2<sup>nd</sup> I became aware of automated phone calls that were being made into homes in the 6<sup>th</sup> Congressional District with a male voice urging voters to stay home and not vote in the election on May 3, 2008. The male voice said the calls were paid for by "Friends of Michael Jackson" thus giving the impression the calls were authorized by Mr. Jackson, the losing candidate in the Democratic Primary of the same election.

On May 3<sup>rd</sup>, similar calls were made with a woman's voice urging voters to not vote. Again, the woman said those calls were "Paid for by Friends of Michael Jackson."


On May 3<sup>rd</sup> I asked Alfred Williams to contact Representative Jackson to ask if he was in fact responsible for the calls. Mr. Jackson told Mr. Williams that he was not and later that day signed an affidavit stating the calls were not authorized by him or his campaign and that his name was being used without his permission.

Around the same time it was determined that the male voice making the calls on May 2<sup>nd</sup> was that of Darrell Glasper. In fact, we received the call at my office (352 Napoleon Street, BRLA, 70802) and saved it on our answering machine. When pressing the button on the phone to respond to the call we were led to the phone of Darrell Glasper.

Later on May 2<sup>nd</sup> a petition for TRO was drafted to enjoin the calls. I brought the TRO to the Clerk of Court's office in downtown Baton Rouge to have it signed and recorded. District Judge Janice Clark signed the petition and deputy Clerk Alfred Buckley was there (along with several other Clerk employees) to record the petition. When I arrived at the Clerk's Office the judge was visiting with Parish Attorney Wade Shows.

While waiting for the Judge to sign the petition Mr. Shows called Mr. Glasper from Mr. Buckley's telephone. Mr. Shows informed Mr. Glasper about what was taking place and asked Mr. Glasper if he knew who was responsible for the automated phone calls that had been made with his voice and from a telephone number linked to Mr. Glasper. Mr. Shows told all present that Mr. Glasper took responsibility for the calls. Shows also reported that Glasper told him that Mr. Jackson had called Glasper on the night of May 2<sup>nd</sup> and demanded the calls be stopped.

Mr. Shows then asked Glasper about the calls going out on May 3<sup>rd</sup> with the woman's voice. At first Glasper tried to deny involvement and knowledge of those calls but when Shows pressed him with the facts that they came from the same phone number and had



the same tag line as the previous night's calls Mr. Glasper told shows the calls had stopped at noon on the 3<sup>rd</sup> "because they never sent the money." Mr. Glasper would not tell Mr. Shows from whom he was expecting payment.

Mr. Glasper later publicly admitted his involvement with the calls in a story that appeared in the May 5<sup>th</sup> edition of the Baton Rouge Advocate.

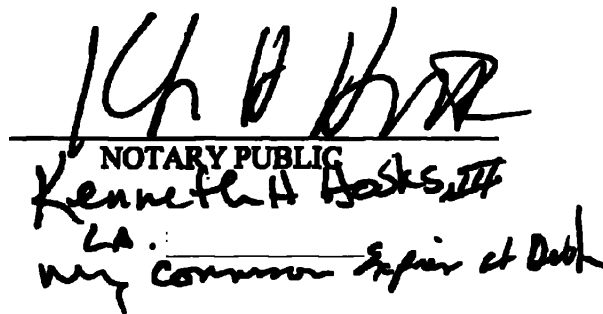
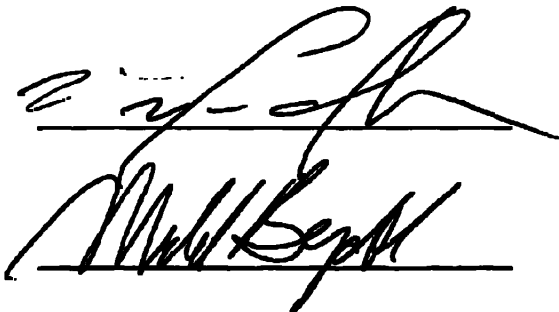


Trey Ourso

Baton Rouge, La. 70802

**THUS DONE, SIGNED, AND SWORN TO**, in my office in the City of Baton Rouge, Parish of East Baton Rouge, State of Louisiana, in the presence of the undersigned competent witnesses, who have hereunto signed their names, together with said appearer and me, Notary, after due reading of the whole.

**WITNESSES:**



NOTARY PUBLIC  
Kenneth A. Haskins, III  
LA.  
my commission expires at 06/01/04

28044214723

**TUESDAY**

MAY 6, 2008

**BATON ROUGE**

2batonrouge.com

50 cents

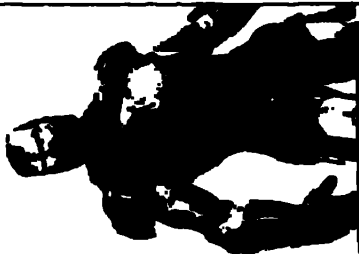
**THE****ADVOCATE**

THE INDEPENDENT VOICE OF SOUTH LOUISIANA

TONY'S INSURANCE  
Comfortable  
High B2 Low: 57.

REBELS 15  
★

**GOOD MORNING,  
LOUISIANA**

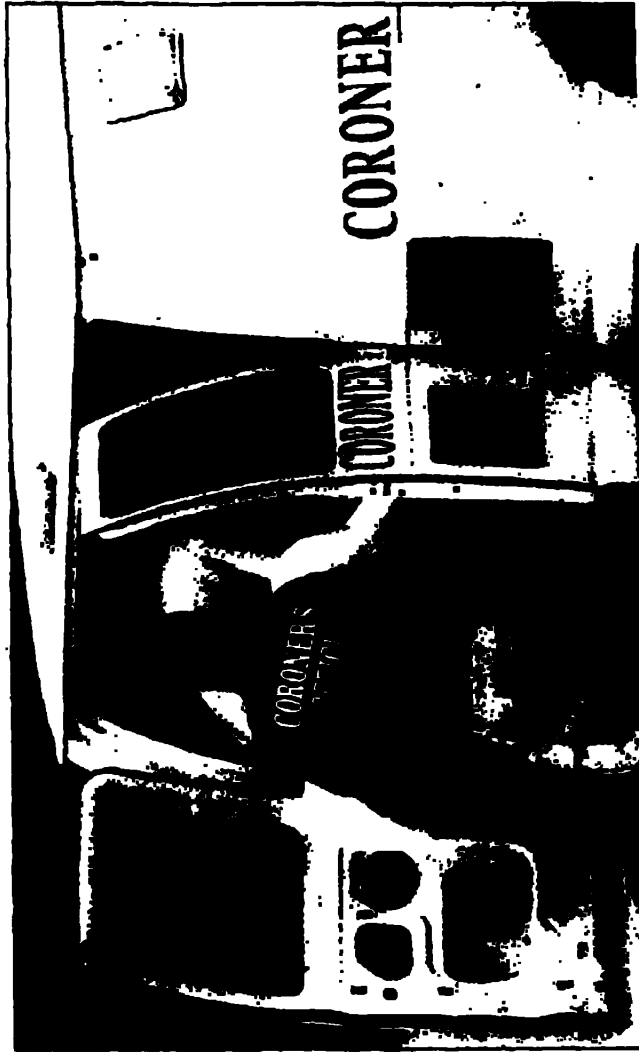
**BUSINESS****'Iron Man'**

pushes Marvel  
to raise profit  
forecast, pledge  
sequel in 2010

&gt; PAGE 10

**LEGISLATURE**

# Two slain in park



**Glasper  
takes  
credit  
for calls**  
Black voters urged  
to stay from polls

BY SAMUEL CHAMBERS

Capital news bureau

A former Metro Councilman said Monday he is responsible for recorded election-day telephone calls asking black people to stay home and not vote in the 6th District congressional election.

The state Democratic Party asked for a restraining order and is investigating the "robocalls."

That lawsuit  
recently left the  
impression

that a former  
black council-

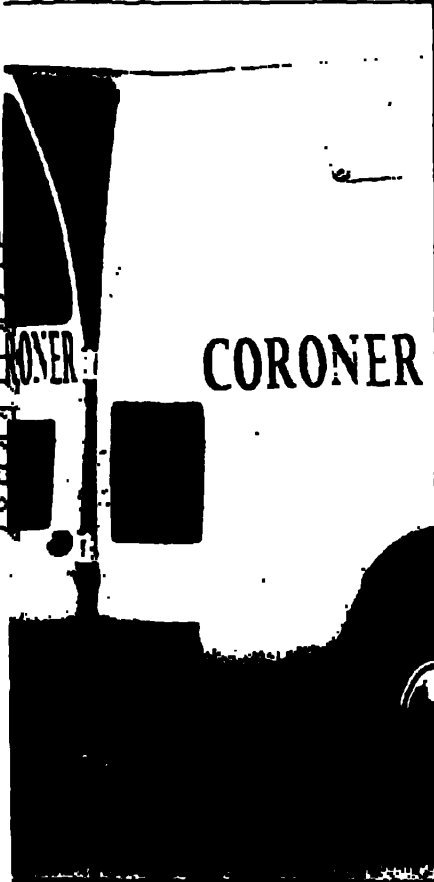
man was be-

hind the ef-

fort



# n park



Advocate staff photos by GARY GILBERT

id from Doyle's Bayou Park in Zachary. The bodies  
nance worker.

## man, son die; girls alive

THE  
BYRON  
writers

Authorities were  
two men late Mon-  
day of a 23-year-  
old and her son who  
found at a ERHC  
the dead woman's  
young girl whose

throat was cut and her infant  
sister, survived the attack, East  
Baton Rouge Parish Sheriff Ed  
Gentreaux said late Monday.

They were hospitalized.  
"It's beyond all reason,"  
Gentreaux said as deputies fin-  
ished the last of their work

>See PARK, page 5A

## Glasper takes credit for calls

Black voters urged  
to stay from polls

BY SARAH CHACRO  
Capital news bureau

A former Metro Council-  
man said Monday he is re-  
sponsible for recorded elec-  
tion-day telephone calls ask-  
ing black people to stay home  
and not vote in the 6th Dis-  
trict congressional election.

The state Democratic Party  
asked for a restraining order  
and is investigating the  
"robo-calls"  
that incor-  
rectly left the  
impression  
that a former  
black candi-  
date was be-  
hind the ef-  
fort.



Glasper

State Rep.  
Don Canyoux of New Roads  
won the election for the seat  
vacated by Richard Baker,  
largely because of the over-  
whelming majority of votes  
he won in predominantly  
black precincts, according to  
election returns.

Canyoux, who is white,  
made it to the general elec-  
tion after defeating Baton  
Rouge state Rep. Michael  
Jackson, who is black, in an  
April Democratic Party  
runoff election.

Former Metro Councilman  
Durrell Glasper, who calls  
himself a community activist,  
said Monday he recorded the  
phone messages under the  
name "Friends of Michael  
Jackson." Glasper said he felt  
the state party did not ade-  
quately support Jackson as a  
candidate in the runoff.

"They spent hundreds of  
thousands of dollars in Baton  
Rouge, all the nine parishes,  
to help a white Democrat get  
elected," Glasper said. "They  
could not have done this with-  
out the help of the minority  
community."

>See GLASPER, page 5A

## for EBR mayor-president

is campaign four  
to mayor promised  
up traffic engineer  
ry to help solve our  
dema, and to have  
re direct traffic at  
actions during rush  
as of those others

fic signals under Holden's \$690  
million Green Light Plan, fund-  
ed by a 23-year extension of the  
half-cent sales tax approved by  
voters in 2005.

Holden said the tax extension  
by saying it would allow the  
bonds to be issued so that the 35  
workers in the Green Light Plan

on road projects.

Crime is another area where  
Holden has failed to make any  
progress, Carter said.

"We have residents who are  
afraid to go outside because of  
the crime in their neighbor-  
hoods," Carter said.

Carter also decried the lack of

search the SUV.

One of the persons of interest

whose body was found in the park, the injured girl and the

in the car was only visiting the park with her grandchildren.

## GLASPER

Continued from page 1A

Glasper said he was trying to "stir debate" among black voters, who have long been loyal to the Democratic Party, as to what they are getting in return.

He said he sent the message to about 10,000 members before Jackson called and asked him to stop. He said he planned to reach 60,000.

Jackson said he had nothing to do with the message. Glasper said he didn't need to ask or tell Jackson about the message.

"As a taxpayer and a community activist, I think that a person who cares about their community will do what's best for the community," Glasper said. "And I think it was best for the community to stir the debate."

Democratic Party Chairman Chris Whittington said Glasper was not hurting the party.

"That is fraudulent voter participation suppression," Whittington said. "Go who is he hurting? He's hurting the black community that's fought so long for their right to vote."

Whittington said the party did not support either candidate before Canyoux won the runoff election.

"He's delusional," Whittington said.

Judge James Clark of Baton Rouge's 19th Judicial District Court, signed a temporary re-

straining order Saturday to stop the use of Jackson's name without his approval.

Jackson wrote a sworn affidavit supporting the request.

Whittington said federal election statutes may have been violated by the message and the party's attorneys are considering further action.

Part of the message cited in the order says, "The national and state Democratic parties always seem to back the white Democrat over the black Democrat, and that's wrong. A lot of us who are supporting Michael Jackson feel the national Democratic Party need to be taught a lesson."

The message goes on to say that Saturday's Republican candidate, Woody Jenkins, would be easier to beat in November, when black presidential candidate Sen. Barack Obama, D-Illinois, is on the ballot.

"On Saturday we are going to stay home and see how the national Democrat Party do without us," the message, according to the restraining order, concludes.

According to Saturday's election results, the message apparently had little effect on black voter turnout.

Demographer Greg Riggs of New Orleans said in precincts with more than 80 percent black registered voters, Canyoux polled about 91 percent of the vote Saturday.

In the April runoff, which had a lower turnout, Jackson

received 89 percent of the vote in those same precincts.

"So they didn't stay home because Jackson wasn't in it," Riggs said. "There may be disappointment but why would somebody opt to be disenfranchised? If you don't show up at all, that's what happens."

Albert Samuels, an associate political science professor at Southern University, said a number of black voters feel they have not received the same support they have given the Democratic Party.

"That could be fed on potentially in an election," he said.

The situation could be compounded in the fall with the presidential election, Samuels said.

"Suppose Barack Obama doesn't get the nomination. Suppose black voters feel that is stolen from him. That could also play out in this local election as well," he said.

Canyoux is only finishing the unexpired term of the district seat, which ends in January 2009. Jackson said he will run for the seat when it comes up again in November.

Kirby Goidel, a professor of mass communication and political science at LSU, said Canyoux's win broke the 33-year hold Republicans had on the 6th District seat. But a divided party in the fall could result in a Republican comeback, he said.

"The Democratic Party really has to address that," he said.

## CARTER

Continued from page 1A

The project is estimated to cost \$1.1 billion, nearly twice the original estimate.

Before Holden took office, the Metro Council approved a series of automatic 4 percent sewer fee increases slated to take effect every January through 2014.

Earlier this year, city-parish officials said that even with fee

increases, the project will still leave a shortfall of \$250 million to \$300 million. The massive sewer system overhaul must be complete by 2015 to comply with the federal mandate.

Carter has been elected to the Metro Council twice and made an unsuccessful bid for state agriculture commissioner last fall. He announced in December 2006 that he was switching his party affiliation to Republican from Democrat. Carter represents District 1

that includes the northern part of East Baton Rouge Parish.

One of 14 children, Carter was raised on a small farm and rode bulls on the rodeo circuit to help finance his college education at Northwestern State University in Natchitoches.

He began his own business buying and selling offshore drilling equipment in 1980.

The open primary in the mayor's race is slated Oct. 4, with a runoff to be held Nov. 4, if necessary.