

FILED

APR 29 2003 *lee*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ^{Phil Lombardi, Clerk} ~~U.S. DISTRICT COURT~~

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JOHN MELVIN ALEXANDER; JUANITA
DELORES BURNETT ARNOLD; J.B.)
BATES; ESSIE LEE JOHNSON BECK;)
JAMES D. BELL; PHINES BELL;)
FRANCES BLACKWELL; JUANITA)
WILLIAMS BLAKELY; JUANITA SMITH)
BOOKER; KINNEY BOOKER; DOROTHY)
BOOKER BOULDING; JEANETTE McNEAL)
BRADSHAW; TERESA EARLEE BRIDGES)
DYSART; JOHNNIE L. GRAYSON BROWN;)
LEE ELLA STROZIER BROWN; CLARENCE)
BRUNER; LULA BELLE LACY BULLOCK;)
JOE R. BURNS; ROSA L. GREEN)
BYNUM; MURIEL MIGNON LILLY)
CABELL; BEATRICE CAMPBELL-)
WEBSTER; JAMES DALE CARTER;)
ROSELLA CARTER; SAMUEL CASSIUS;)
NAOMI HOOKER CHAMBERLAIN; MILDRED)
MITCHELL CHRISTOPHER; MILDRED)
LUCAS CLARK; OTIS GRANVILLE)
CLARK; SANDY CLARK; BLANCHE)
CHATMAN COLE; WORDIE "PEACHES")
MILLER COOPER; CARRIE HUMPHREY)
CUDJOE; Laverne COOKSEY DAVIS;)
DOLLY MAE DOUFITT; JAMES DURANT;)
LUCILLE B. BUCHANAN FIGURES;)
ARCHIE JACKSON FRANKLIN; JIMMIE)
LILLY FRANKLIN; JOAN HILL)
GAMBREL; ERNESTINE GIBBS; HAROLD)
GIBBS; THERESSA CORNELLA McNEAL)
GILLIAM; EDWARD L. GIVENS; BERTHA)
GUYTON; HAZEL FRANKLIN HACKETT;)
MILDRED JOHNSON HALL; NELL)
HAMILTON HAMPTON; LEROY LEON)
HATCHER; MADELEINE HAYNES; JOYCE)
WALKER HILL; ROBERT HOLLOWAY; DR.)
OLIVIA J. HOOKER; SAMUEL L.)
HOOKER, JR.; WILHELMINA GUESS)
HOWELL; CHARLES HUGHES; MYRTLE)
WELLS HURD; VERA INGRAM; EUNICE)
CLOMAN JACKSON; GENEVIEVE)
ELIZABETH TILLMAN JACKSON; WILLIE)

CASE NO. 03-CV-133 E(c)
SECOND AMENDED COMPLAINT
FOR:
(1) DEPRIVATION OF LIFE AND LIBERTY AND THE PRIVILEGES AND IMMUNITIES OF UNITED STATES CITIZENSHIP IN VIOLATION OF THE FOURTEENTH AMENDMENT OF THE U.S. CONSTITUTION;
(2) DEPRIVATION OF PROPERTY AND PRIVILEGES AND IMMUNITIES OF UNITED STATES CITIZENSHIP IN VIOLATION OF THE FOURTEENTH AMENDMENT OF THE U.S. CONSTITUTION;
(3) VIOLATION OF THE EQUAL PROTECTION CLAUSE AND THE PRIVILEGES AND IMMUNITIES CLAUSE OF THE FOURTEENTH AMENDMENT OF THE U.S. CONSTITUTION;
(4) VIOLATION OF U.S.C. §1981;
(5) VIOLATION OF U.S.C. §1983;
(6) VIOLATION OF U.S.C. §1985;

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BELL WHITE JACKSON; DR. HOBART)
JARRETT; ARTIE LACY JOHNSON;)
WILMA MITCHELL JOHNSON; EDWARD)
EARVEN JONES; HAZEL DOLORES SMITH)
JONES; JULIA BONTON JONES; PERCY)
JONES; THELMA THURMAN KNIGHT;)
LEANNA JOHNSON LEWIS; KATIE MAE)
JOHNSON LIVINGSTON; ALICE HIGGS)
LOLLIS; ROANNA HENRY McCLURE;)
ELDORIS MAE ECTOR McCONDICHIE;)
CAROL SMITHERMAN MARTIN; MARY)
TACOMA MAUPIN; WILLIE MUSGROVE)
MEANS; ISHMAEL S. MORAN; RUTH)
DEAN NASH; SIMEON L. NEAL;)
ALMADGE J. NEWKIRK; MYRTLE NAPIER)
OLIVER; JUANITA MAXINE SCOTT)
PARRY; IDA BURNS PATTERSON;)
FREDDIE SCOTT PAYNE; JOAN)
ALEXANDER POWDRILL; ALICE)
PRESLEY; DeLOIS VADEN RAMSEY;)
CORA HAWKINS RENFRO; SIMON R.)
RICHARDSON; JEWEL SMITHERMAN)
ROGERS; GERLINE HELEN WRIGHT)
SAYLES; JULIUS WARREN SCOTT;)
WILLIAM A. SCOTT; TULETA S.)
DUNCAN SHAWNEE; VENEICE DUNN)
SIMMS; HAL "CORNBREAD" SINGER;)
NAOMI SIPLIN; BEULAH LOREE KEENAN)
SMITH; GOLDEN WILLIAMS SMITH;)
LOLA SNEED SNOWDEN; JAMES L.)
STEWARD; DOROTHY WILSON)
STRICKLAND; SARAH TATUM; LOIS)
WHITE TAYLOR; WILLIE MAE SHELBURN)
THOMPSON; EFFIE LEE SPEARS TODD;)
MELVIN C. TODD; KATHRYN MAE)
TAYLOR TOLIN; BESSIE MAE AUSTIN)
VESTER; QUEEN ESTHER LOVE WALKER;)
SAMUEL WALKER; TROY SIDNEY)
WALKER; OSCAR DOUGLAS WASHINGTON;)
MARY LEON BROWN WATSON; ALLEN)
MATTHEW WHITE; CECIL WHITE; MARIE)
WHITEHORN; MILDRED EVITT WILBURN;)
BERTRAM C. WILLIAMS; LOUIE BARTON)
WILLIAMS; WILLIAM HAROLD WOOD;)
CLOTIE LEWIS WRIGHT; WESS YOUNG;)
DONNA ADAMS; JOHNETTA ADAMS;)

(7) PROMISSORY ESTOPPEL;

(8) NEGLIGENCE.

Filing Date: _____
Trial Date: _____

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2 THOMAS ADAMS, JR.; C.J.)
ALEXANDER; GEORGE ALEXANDER;)
3 LILLIAN ALEXANDER; BRENDA NAILS)
ALFORD; BETTY ANDERSON; RHONDA)
4 ANDERSON; ROBERT EARL ANDERSON;)
IRMA THOMAS ANTHONY; LEONA JERRYE)
5 BRUNER ANTHONY; MARY BELL)
ARRINGTON; ARVEN AUTRY; ELMER)
6 AUTRY; JAMES AUTRY; OTIS AUTREY,)
JR.; RUTH ELLA AUTRY; MARGUERITE)
7 BAGBY; JOHN BAILEY; NICHOLAS A.)
BANKS; EDITH MCALESTER EARNES;)
8 LESLIE BEARD; RAYMOND BEARD, SR.;)
AUDELE MCLEOD BEEKS; R.G. BELL;)
9 WILMA PRESLEY BELL; SIMON BERRY)
JR.; REV. BRADFORD BISHOP; EUGENE)
10 BOLTON; JAMES BOLTON; OSCAR BOYD;)
DOROTHY WILLIAMS BRANLETT;)
11 DOROTHY JACKSON BREWER; PATRICIA)
DUKES BROME; NAOMI LAWSON BROWN;)
12 WILLIAM BRUNER; BRENDA FAIR)
CAMPBELL; HENRY CANNON; NATHANIEL)
13 CANNON; EDWINA WALKER CARR;)
BERNARD CARTER; EDDIE HUE CARTER;)
14 ROBERT CARTER, JR.; SAMUEL LEE)
CARTER; ELIZABETH COOLEY)
15 CHAPPELLE; ANITA WILLIAMS)
CHRISTOPHER; VASSIE CLARK; AILEEN)
16 JOANNE AUSTIN COBURN; MARILYN KAY)
JOHNSON COLEY; ERLINE CROSSLIN;)
17 BERNICE E. BANKS DAVIS; FRED)
DAVIS; ROY DAVIS; LAWRENCE HERMAN)
18 DENNIE; EVELYN DIGGS; ROBERT)
CHARLES DUKES; WILLIE DUKES; RITA)
19 DUNCAN; ROGER DUNCAN; SYLVIA A.)
DUNN; AMY GAMBLE EIDSON; MARY L.)
20 EMERSON; BILL EWING; JO ANN)
EWING; ROBERT EWING; JANET FAIR;)
21 STANLEY FAIR, JR.; WILBUR FOSTER;)
ALFREDA O. DENNIE FRANKLIN; JOHN)
22 HOPE FRANKLIN; JEAN FREENY;)
THELMA KINLAW GERMANY; MARGARET)
23 JEAN TILLEY GIBBS; BOBBYE LOUISE)
GILBERT; JEANNE OSBY GOODWIN;)
24 LINDA EDMONDSON GRAVES; ALBERT)
GRAYSON; KATHERINE WOOD HALE;)
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2 LEONTYNE THOMAS HARRELL; DELORES)
HARRINGTON; MARY PRISCILLA PARKER)
3 HARRISON; JEANETTE HAWKINS;)
OLANDER HAWKINS; STARLA HAWKINS;)
4 JOBIE ELIZABETH HOLDERNESS;)
MAYBELLINE PRESLEY HOOKS; JUANITA)
5 ALEXANDER HOPKINS; SHARON)
HOPKINS; EMMA LOCKARD HORN;)
6 MAXIMILLIAN HOWELL; MIDLRED)
WALLACE HUSPETH; HELEN SIPUEL)
7 HUGGINS; CLARENCE JACKSON; DELLA)
SHELTON JACKSON; GAIL JACKSON;)
8 GENIEIVE JACKSON; ROSIE LEE)
JACKSON; SAYYID JAMI; ARTHUR)
9 JEFFERSON; LULA MAE JEFFERSON;)
MATTHEW JEFFERSON; ROBERT)
10 JEFFERSON; GERALDINE FAIR JESSIE;)
CAROLYN PRICE JOHNSON; FELICIA)
11 MCLEOD JOHNSON; JOANN JOHNSON;)
RONALD WAYNE JOHNSON; VAL GENE)
12 JOHNSON, SR.; DOROTHY JONES; EVA)
MAE TILLEY JONES; MELVIN "TIP")
13 JONES; MILDREN PRELSEY KAVANAUGH;)
VERNELL KELLEY; BEVERLY NAILS)
14 KELLY; LORELL KIRK; FRANCINE)
JOHNSON KNAPPER; JAMES BERNARD)
15 KNIGHTEN; MAXINE JACKSON LACY;)
SANDRA JEAN DAVIS LANDRUM; CAESAR)
16 LATIMER; CHARLES SYLVESTER)
LATIMER; HAZEL LATIMER; JAMES)
17 HAROLD LATIMER; JAYPHEE LATIMER;)
LISA LATIMER; PATRICE LATIMER;)
18 BERNICE LAWLER; EDWARD LAWSON;)
JOHNNYE CANNON LAWSON; MARCUS)
19 LAWSON; MARGARET ANN LAWSON;)
PALMER LAWSON, JR.; GLENDA)
20 LEBEAUX; MARGARET LEE; NORMA JEAN)
DENNIE LESHIE; JIMMIE LEWIS; JOE)
21 LEWIS; LORRAINE LEWIS; CORTEZ)
LOCKARD; EDWARD LOCKARD; ERNEST)
22 LOCKARD; FRANK LOCKARD; JESSIE)
MAE LOCKARD; OSCAR LOCKARD; SELMA)
23 LOCKARD; MARY LOUPE; CATHERINE)
MARTIN; FELTON MARTIN; JAMES)
24 PRESTON MARTIN; NANCY MARTIN;)
FAYE MAY; SARAH CURVAY MAYSHAW;)
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2 LEONA AUSTIN MCCAIN; PAULINE)
MCCANTS; DENISE MCCRAY; OTIS)
3 MCCRAY III; LORRAINE MCFARLAND;)
JEAN WILLIAMS MCGILL; DONALD JOHN)
4 MCGOWAN; WALLACE MCLEOD, JR.;)
BETTY PRESLEY MCMILLAN; LADAWNA)
5 MILLER; MILDRED MARIAN HAMEL)
MILLER; PEGGY ANN MCRUFFIN)
6 MITCHELL; OVETA MIXON; ELIZABETH)
PRESLEY MONDAY; PAT GALBRAITH)
7 MOORE; RONALD EARL MOORE; EVA)
GAMBLE MORRIS; CLARINDA NAILS;)
8 TERRY NASH; EARTHA MCALESTER)
NORMAN; MATTIE DAVIS OLIVER;)
9 LAVADA LOUISE PARKER OSBOURNE;)
AUDREY BANKS PARSON; JOHN W.)
10 PATTON; LENA MAE JOHNSON PAYNE;)
JULIUS PEGUES; GERALDINE)
11 PERRYMAN-TEASE; WANDA EWING POPE;)
ESCO PORTERFIELD; MARK)
12 PORTERFIELD; JILL ELIZABETH)
PRESLEY; JOYCE MARIE PRESLEY;)
13 LISA PRESLEY; RAYMOND PRESLEY;)
RONALD DEAN PRESLEY; FLOYD PRICE;)
14 JANE FAIR PRUETT; MARCIA WALKER)
PUCKETT; JOYCE RAMSEY; ALLENE)
15 KNIGHTEN RAYFORD; MAE ETTA)
REYNOLDS; SHIRLEY RIDLEY; PATSY)
16 ROBINSON; FRANK EUGENE RODGERS;)
ERIC ROLLERSON; LEON ROLLERSON;)
17 WILA ROLLERSON; YVONNE ROLLERSON;)
JANICE LOU JOHNSON ROSS; BILLIE)
18 WAYNE RUCKER; J.C. RUCKER; ROBERT)
C. RUCKER; BOBBIE JEAN SAULET;)
19 MILDRED LOUISE DAVIS SCOTT;)
THERESA DAVIS SCOTT; YVONNE FAIR)
20 SHAW; BILLY SHELTON; DIANA LYNN)
SHELTON; JOHNNY SHELTON; MAIME)
21 SHELTON; SHIRLEY SHELTON; EUNA)
VANN SMITH; FRED SMITH; HARRIET)
22 ADAMS SMITH; ORA SMITH; CLAUDIA)
MAUDE SMITHERMAN; CATHRYN BELL)
23 SNODDY; BETTY SPEARS; DIANE)
ANDERSON STEELE; PATRICIA MCLEOD)
24 STEPHENSON; LAUREL STRADFORD;)
ROSE STRIPLIN; CARRIE M. MCDONALD)
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STROTHER; MARTHA MCGLORIE)
SWINDALL; AUDREY TAYLOR; BYRON)
TAYLOR; BOBBIE JEAN CARTER)
TENNYSON; SYLVESTER TERRY, JR.;)
MARGARET THARPE; JERRY FIELDS)
THOMAS; JESSIE THOMAS; ERMA SMITH)
THOMPSON; PANSY TILLEY; CLIFTON)
JOE TIPTON; ROSEZELLA TURNER;)
SHIRLEY A. JOHNSON TYUS; MAXINE)
JESSIE VADEN; LORENZO CARLOS)
VANN; ALICE BOYD VAUGHN; FANNIE)
SMITH VERNER; PAM VINCENT;)
MARIETTA ANDERSON WAITERS;)
DENETTE MARIA WALKER; FRANK)
WALKER, SR.; HARRY DANIEL WALKER;)
HARRY LEON WALKER; RILEY WALKER,)
JR.; WILLIAM D. WALKER; MARGE)
WALLACE; MAYBELLE WALLACE;)
MILDRED CANNON WALLACE; SYLVIA)
WARE; OLENE WALKER WASHINGTON;)
JIMMIE WICKAM; YVONNE WILEY-WEBB;)
CHARLOTTE WILLIAMS; DAVID)
WILLIAMS; FANNIE WILLIAMS; GRANT)
WILLIAMS; PATRICIA WILLIAMS; IDA)
LOUISE DENNIE WILLIS; ANNIE)
ALEXANDER WILSON; BERTHA WILSON;)
BOBBIE WILSON; ELIZABETH WILSON;)
MARY A. WILSON; NAOMI NASH)
WILLIAMS WIMBERLY; RAMONA DINKINS)
WIMBERLY; EDNA EARLY WORKS;)
CHARLOTTE WRIGHT,)

Plaintiffs,

v.

THE STATE OF OKLAHOMA; THE CITY
OF TULSA; THE CHIEF OF POLICE OF
THE CITY OF TULSA (in his
official capacity); THE CITY OF
TULSA POLICE DEPARTMENT; and DOES
1 through 100, inclusive,

Defendants.

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COMPLAINT
(Jury Trial Requested)

Plaintiffs JOHN MELVIN ALEXANDER et al. allege as follows:

STATEMENT OF JURISDICTION

1. This action arises under the Fourteenth Amendment to the Constitution of the United States; the Civil Rights Act of April 9, 1866, 14 Stat. 27, currently codified at 42 U.S.C. §1981; the Civil Rights Act of April 20, 1871, 17 Stat. 13, currently codified at 42 U.S.C. §§1983, 1985(3) and the laws of the State of Oklahoma. Jurisdiction is based on 28 U.S.C. §§1331, 1343, and 1367.

HISTORICAL OVERVIEW OF THE CIRCUMSTANCES
THAT PRECIPITATED THIS SUIT

A. Plaintiffs And Defendants

2. Plaintiffs, United States citizens, are the African American survivors of the "Riot" of May 31, 1921 to June 1, 1921, and/or their descendants who were African American residents of the Greenwood section of the City of Tulsa ("Greenwood"). They bring this suit for restitution and repair of the injuries sustained by them or their relatives from the actions and inaction of the agents of the STATE OF OKLAHOMA and the CITY OF TULSA for acts they committed during and in the aftermath of the Riot. Defendants THE STATE OF OKLAHOMA and the

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2 CITY OF TULSA conspired together and acted in concert with one
3 another throughout and after the Riot. They called out local
4 units of the State National Guard and deputized white citizens
5 of Tulsa, Oklahoma ("Tulsa"), who, acting under color of state
6 law, participated as members of a white mob in a race Riot that
7 was designed to, and did in fact, brutalize and terrorize the
8 African American residents of the Greenwood District. Almost
9 every building in the Greenwood District was razed to the
10 ground.

11 3. One group of Plaintiffs was forcibly removed
12 from their homes by the white mob that included Defendants'
13 lawful agents. That group includes: FRANCES BLACKWELL; NELL
14 HAMILTON HAMPTON; ISHMAEL S. MORAN; JUANITA MAXINE SCOTT PARRY;
15 and JAMES L. STEWARD, who was forced out of his home after the
16 rioting white mob set fire to the building while he and his
17 family were still inside.

18 4. Other Plaintiffs escaped from the mob only to be
19 captured later by the members of Defendant the CITY OF TULSA'S
20 police force or by the National Guard. They include Plaintiffs
21 JOHN ALEXANDER, JUANITA SMITH BOOKER, KINNEY BOOKER, DOROTHY
22 BOOKER BOULDING, JOHNNIE L. GRAYSON BROWN, JOE R. BURNS, ROSA L.
23 GREEN BYNUM, BEATRICE CAMPBELL-WEBSTER, NAOMI HOOKER
24 CHAMBERLAIN, MILDRED MITCHELL CHRISTOPHER, CARRIE HUMPHREY
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2 CUDJOE, LUCILLE BUCHANAN FIGURES, ERNESTINE GIBBS, HAROLD GIBBS,
3 HAZEL FRANKLIN HACKETT, MADELEINE HAYNES, JOYCE WALKER HILL,
4 VERA INGRAM, EUNICE CLOMAN JACKSON, GAIL JACKSON, DR. HOBART
5 JARRETT, HAZEL DELORES SMITH JONES, MARY TACOMA MAUPIN, ALICE
6 HIGGS LOLLIS, ISHMAEL S. MORAN, SIMON R. RICHARDSON, BEULAH
7 LOREE KEENAN SMITH, GOLDEN WILLIAMS SMITH, DOROTHY WILSON
8 STRICKLAND, LOIS WHITE TAYLOR, BERTRAM C. WILLIAMS, LOUIE BARTON
9 WILLIAMS, and WESS YOUNG.

10 5. Other Plaintiffs were forced to flee town
11 completely. They include J.B. BATES, LULA BELLE LACY BULLOCK,
12 JAMES DALE CARTER, who was carried forty miles by his mother,
13 ROSELLA CARTER, OTIS GRANVILLE CLARK, LEROY LEON HATCHER, who
14 walked nine miles to escape the rioting white mob, JOYCE WALKER
15 HILL, EDWARD EARVEN JONES, FRANCINE JOHNSON KNAPPER, GLENDA
16 LEBEAUX, ELDORIS MAE ECTOR McCONDICHIE, OVETA MIXON, SIMEON L.
17 NEAL, RUTH DEAN NASH, JUANITA MAXINE SCOTT PARRY, IDA BURNS
18 PATTERSO, ALICE PRESLEY, TULETA S. DUNCAN SHAWNEE, BEULAH LOREE
19 KEENAN SMITH, LOLA SNEED SNOWDEN, LOIS WHITE TAYLOR, WILLIE MAE
20 SHELburn THOMPSON, QUEEN ESTHER LOVE WALKER, who was shot at as
21 she attempted to flee, and MARIE WHITEHORN

22 6. These and other Plaintiffs had their property
23 looted and burned by the white mob acting under color of state
24 law. They include J.B. BATES, ESSIE LEE JOHNSON BECK, J.D.

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BELL, PHINES BELL, EUGENE BOLTON, JAMES BOLTON, JUANITA SMITH
BOOKER, KINNEY BOOKER, DOROTHY BOOKER BOULDING, JEANETTE McNEAL
BRADSHAW, TERESA EARLEE BRIDGES DYSART, PATRICIA DUKES BROME,
JOHNNIE L. GRAYSON BROWN, ROSA L. GREEN BYNUM, MURIEL MIGNON
LILLY CABELL, MILDRED MITCHELL CHRISTOPHER, MILDRED LUCAS CLARK,
OTIS GRANVILLE CLARK, BLANCHE CHATMAN COLE, CARRIE HUMPHREY
CUDJOE, EVEYLYN DIGGS, ROBERT CHARLES DUKES, WILLIE DUKES,
HATTIE LILLY DUNN, JAMES DURANT, LUCILLE BUCHANAN FIGURES,
ARCHIE JACKSON FRANKLIN, JIMMIE LILLY FRANKLIN, JEAN FREENY,
ERNESTINE GIBBS, HAROLD GIBBS, MARGARET TILLEY GIBBS, THERESSA
CORNELLA McNEAL GILLIAM, MILDRED JOHNSON HALL HAZEL FRANKLIN
HACKETT, KATHERINE WOOD HALE, LEROY LEON HATCHER, MADELEINE
HAYNES, JOYCE WALKER HILL, DR. OLIVIA J. HOOKER, SAMUEL L.
HOOKER, JR., WILHELMINA GUESS HOWELL, MILDRED WALLACE HUDSPETH,
VERA INGRAM, GENEVIEVE ELIZABETH TILLMAN JACKSON, SAYYID JAMI,
DR. HOBART JARRETT, WILMA MITCHELL JOHNSON, HAZEL DELORES SMITH
JONES, JULIA BONTON JONES, THELMA KNIGHT, CAROL SMITHERMAN
MARTIN, MARY TACOMA MAUPIN, PAULINE MCCANTS, RUTH DEAN NASH,
SIMEON L. NEAL, ALMADGE J. NEWKIRK, JUANITA MAXINE SCOTT PARRY,
IDA BURNS PATTERSON, DELOIS VADEN RAMSEY, JEWEL SMITHERMAN
ROGERS, GERLINE HELEN WRIGHT SAYLES, JULIUS WARREN SCOTT,
VENEICE DUNN SIMS, HARRIET ADAMS SMITH, BEULAH LOREE KEENAN
SMITH, GOLDEN WILLIAMS SMITH, LOLA SNEED SNOWDEN, JAMES L.

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2 STEWARD, LAUREL STRADFORD, DOROTHY WILSON STRICKLAND, LOIS WHITE
3 TAYLOR, WILLIE MAE SHELBURN THOMPSON, EFFIE LEE SPEARS TODD,
4 MELVIN C. TODD, QUEEN ESTHER LOVE WALKER, SAMUEL WALKER, TROY
5 SIDNEY WALKER, SYLVIA WARE, MARY LEON BROWN WATSON, YVONNE
6 WILEY-WEBB, and CHARLOTTE WRIGHT.

7 7. Other Plaintiffs were physically injured. They
8 include CARRIE HUMPHREY CUDJOE, JAMES DURANT, and BEULAH LOREE
9 KEENAN SMITH.

10 8. Other Plaintiffs had family members who were
11 killed by the rioting white mob. They include J.B. BATES, LEROY
12 LEON HATCHER, and CECIL WHITE.

13 9. The rioting white mob so terrorized many of the
14 Plaintiffs' families, including those of ELDORIS MAE ECTOR
15 McCONDICHIE, ALICE PRESLEY, and WILLIE MAE SHELBURN THOMPSON
16 that they left Tulsa or the State of Oklahoma for good in the
17 wake of the Riot.

18 10. Many of the Plaintiffs' families were denied the
19 opportunity to rebuild their homes and businesses in Greenwood
20 subsequent to the Riot.

21 11. The TULSA CHIEF OF POLICE is sued in his
22 official capacity because his predecessor in office acted in a
23 manner consistent with the powers accruing to that office. In
24 civil rights lawsuits, it is not the historical person, but the
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2 state or municipal institution that is held responsible for the
3 acts of government officials. Because the individual occupying
4 the position of Chief of Police of Tulsa in 1921 used the
5 official power of his position to propagate the Riot and empower
6 the rioting white mob, the incumbents of these positions remain
7 responsible for the official acts carried out in the name of the
8 Chief of Police. THE STATE OF OKLAHOMA, THE CITY OF TULSA and
9 THE CITY OF TULSA POLICE DEPARTMENT are also sued.

10 B. Background of the Suit

11 12. Before the Civil War, Oklahoma was a territory
12 in which African Americans were held in slavery. After the war,
13 African Americans and others migrated to "the territory,"
14 seeking economic opportunity. Oklahoma was, in the words of
15 Ralph Ellison; "a magnet for many individuals who had found
16 disappointment in the older area of the country, white as well
17 as black, but for Negroes it has a traditional association with
18 freedom which had entered their folklore. Thus the uneducated
19 and educated alike saw Oklahoma as a land of opportunity."¹

20 13. Yet after Oklahoma gained statehood in 1907,
21 African Americans faced increasing discrimination at the hands
22

23 ¹ Going to the Territory, in The Collected Essays of Ralph
24 Ellison 601 (John Callahan ed. 1995).

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2 of white settlers. The legislature's first bill called for
3 segregation on railroads. The state enacted restrictions on
4 African Americans' voting rights and service on juries, and
5 starting in the 1910's, but continuing throughout the Jim Crow
6 era,² municipalities in Oklahoma promoted gross differentials in
7 funding of white and separate, segregated schools. Twice during
8 the decade of the 1910's the United States Supreme Court struck
9 down Oklahoma legislation that discriminated on the basis of
10 race: the first was the railroad segregation statute; the second
11 was the grandfather clause in voting registration. Defendants
12 THE STATE OF OKLAHOMA and the CITY OF TULSA, however, persisted
13 in their racial discrimination.³

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16 ² Jim Crow is the name historians give to the period between
17 the end of Reconstruction and the New Deal, which was
18 characterized by segregation laws. See C. Vann Woodward, The
19 Strange Career of Jim Crow (3rd ed. 2002); Kenneth W. Mack,
20 "Law, Society, Identity, and the Making of the Jim Crow South,"
21 24 L. & Soc. Inquiry 377-409 (1999). Those laws typically
22 provided for segregation on railroads, in schools, in housing,
23 and in public accommodations. Reconstructing the Dreamland: The
24 Tulsa Riot of 1921 79 (2002).

25 ³ In a series of cases, the Oklahoma Supreme Court also

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2 14. African Americans who violated the etiquette of
3 segregation were subjected to violence at the hands of the white
4 citizenry, on many occasions through the action or inaction of
5 the state. Sometimes that violence took the form of riots, such
6 as an incident in Norman, Oklahoma, a small town that is now the
7 home of the University of Oklahoma. In 1898, a white man
8 employed an African American construction worker. A portion of
9 the white community, including Norman city officials, incensed
10 by the interracial workplace, severely injured the white man for
11 employing an African American.⁴

12 15. Also common at the time were what was known as
13 "nigger drives," to remove African Americans from cities. After
14 African Americans were driven out, cities established informal
15 "sun down" laws. They placed notices in prominent places
16 notifying African Americans that they could not remain in the
17 city after dark. For example, in the early 1920s the signs in
18 Norman, Oklahoma, read, "Nigger, don't let the sun go down on
19

20 upheld differential funding of African American and white public
21 schools, and cities throughout the state passed zoning
22 ordinances requiring residential segregation.

23 ⁴ See Wallace v. City of Norman, 60 P. 108 (Okla. Terr.
24 1900).

1
2 you in this town."⁵ At other times, the racial violence led to
3 death by lynching: the Oklahoma State Legislature found that of
4 the 24 individuals lynched in Oklahoma between 1911 and 1921,
5 before 1921, 23 were African Americans.⁶ Months before the
6 Riot, in August 1920, it was clear that the rule of law had
7 broken down in the state. Two men were lynched on the same
8 weekend in Oklahoma: one — the only white man lynched during
9 that period — was taken from the Tulsa jail and lynched in
10 front of a crowd that included Tulsa police officers;⁷ and the
11 next day an African American man was taken from the Oklahoma
12 City jail and lynched.⁸

13 16. The African American community grew increasingly
14 concerned over lynchings. The August 1920 lynchings drove home
15 a particularly important lesson: that no one was safe in the
16

17 ⁵ Norman Mob After Singie Smith Jazz, Oklahoma City Black
18 Dispatch (February 9, 1922).

19 ⁶ See 74 Okl. St. Ann. §8000.1.1 (West 2002).

20 ⁷ Governor Invokes Law Versus Mobbists, Tulsa Star (September
21 4, 1920).

22 ⁸ Claude Chandler Hung By Mob, Posse Follows Too Late: Body
23 Found West of City, Oklahoma City Black Dispatch (September 3,
24 1920).

1
2 Tulsa jail and that the African American community was likely to
3 be a continuing target of white mob violence. The Tulsa Star,
4 Greenwood's leading newspaper, editorialized about the Oklahoma
5 City lynching that "While the boy was in jail . . . there was
6 danger of mob violence."⁹ The possibility of another lynching
7 was very real to African Americans in the Greenwood District of
8 Tulsa. The Riot, which began on May 31, 1921, and lasted
9 through the night into June 1, 1921, was precipitated by the
10 rumor of just such a lynching.

11 C. Basis of the Suit

12
13 17. On the evening of May 31, 1921, a white mob,
14 many of whom were drunk, gathered in front of the Tulsa jail,
15 and was rumored to be preparing to lynch an African American man
16 accused of attempting to assault a white woman. Some African
17 American men, including World War I veterans, came to the jail
18 to prevent the lynching. During a mêlée between some of the
19 white and African American men, shots were fired and "all hell
20 broke loose."¹⁰ The Mayor of the CITY OF TULSA, acting under

21
22 ⁹ The Facts Remain the Same, Tulsa Star (September 18, 1920).

23 ¹⁰ Alfred Brophy, Assessing State and City Culpability: The
24 Riot and the Law, published with Commission Report, 153, 156
25 (2001).

1
2 color of law, called out local units of the State National Guard
3 and, with the assistance of the TULSA CHIEF OF POLICE, deputized
4 and armed some of the white citizens of Tulsa, many of whom were
5 part of the drunken mob. The deputies were instructed to "go
6 get . . . a nigger."¹¹ The deputized white citizens, acting
7 under color of law, terrorized and brutalized the African
8 American residents of Greenwood.

9 18. In the early hours of the morning of June 1,
10 1921, local units of the National Guard, along with the white
11 Chief of Police and his deputies, removed the African American
12 residents of Greenwood from their homes. The deputies and the
13 white mob then looted the empty buildings before burning
14 Greenwood to the ground. Defendants harnessed the latest
15 techniques of modern warfare to put down what they considered a
16 "Negro Uprising." Defendants or their agents deployed a machine
17 gun to fire on African American residents of Greenwood.

18 Defendants or their agents also used airplanes for
19 reconnaissance of Greenwood. In addition, some eyewitnesses
20 recall that one or more of the airplanes engaged in the attack
21 by shooting at the African American Greenwood residents and
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23 ¹¹ Dr. Scott Ellsworth, *The Riot*, published with the
24 Commission Report, 37, 64 (2001).
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2 dropping one or more incendiary devices. These acts resulted in
3 the mass destruction of property located in Greenwood, as well
4 as the unlawful killing of hundreds of African American
5 residents of Greenwood. In the course of the Riot, Defendants
6 unlawfully detained African American residents of Greenwood,
7 forcing many of them to work in captivity.

8 19. The Riot, which occurred only sixty years after
9 the end of de jure slavery in 1865, was part of a much larger
10 culture of discrimination against African Americans, which was
11 itself a legacy of slavery. Many of the Riot victims themselves
12 had been slaves. Many whites explained the Riot was the result
13 of increasingly aggressive attitudes of African Americans, who
14 sought "social equality" following their service in World War I.
15 One African American property-owner was characterized as a man
16 who had "come back from the war in France with exaggerated ideas
17 about equality and thinking he can whip the world."¹² The role
18 of the Riot in reducing the status of Tulsa's African American
19 community was told by one white newspaper: "The white citizens
20 of Tulsa have forgotten the bitter hatred and their desperation
21 that caused them to meet the negroes in battle to the death
22

23
24 ¹² Negro Tells How Others Mobilized, Tulsa Tribune (June 4,
25 1921).

1
2 Tuesday."¹³ Only once African Americans had been reduced to the
3 status of "helpless refugees," could they be seen as objects of
4 charity.¹⁴

5 20. The claim that the Riot was an attempt to
6 restore segregation and hark back to the antebellum past was
7 supported by statements within the African American press as
8 well. The Oklahoma City Black Dispatch observed after the Riot,
9 that:

10 "The old order changeth; no longer is the Negro
11 satisfied or clothed with the placidity of spirit of
12 his slave parents. We black men in Oklahoma know that
13 the legislature of this state tried to deprive us of
14 our franchise when it enacted the 1916 Registration
15 act; we know that such a statute is in conflict with
16 the Constitution of the United States and its
17 interpretation by the Supreme Court. NO LONGER WILL WE
18 BE SATISFIED WITH THE PIG TAILS OF CITIZENSHIP; we
19 want to eat farther up on the body of the hog."¹⁵

20 21. Other whites linked the Riot to demands for
21 equal treatment by people only recently removed from slavery.
22 One white man wrote in the aftermath of the Riot, that "White
23 adventurers trapped him in his native jungle only a few years
24 ago; shipped him in chains to serve the white man in other

25 ¹³ To Rebuild Homes for Negro Owners and Probe Blame, Muskogee
26 Phoenix (June 3, 1921)

¹⁴ Id.

¹⁵ An Inflammatory Appeal, Black Dispatch (October 15, 1920).

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2 lands; a stroke of political fortune makes him free and 'equal'
3 to the white man in our country, and he has the consummate gall
4 and impudence to want a place at the council board of the white
5 man's civilization." A white Tulsa paper editorialized after
6 the Riot about the consequences of slavery. "If those who
7 invaded the shores of the Dark Continent for the purpose of
8 securing slaves for the southern plantations of America could
9 have foreseen the consequence of their acts it is certain the
10 black man would never have been introduced to the United
11 States."

12 22. In 1997, in an effort to end the "conspiracy of
13 silence"¹⁶ and to promote a discussion involving the whole
14 community of the CITY OF TULSA and THE STATE OF OKLAHOMA, THE
15 STATE OF OKLAHOMA itself commissioned a study to determine
16 liability for the Riot and make recommendations for restitution
17 for the Riot's victims. The resulting body, The Oklahoma
18 Commission to Study the Riot of 1921 ("Commission"), ascertained
19 the causes and consequences of the Riot. The Oklahoma State
20 Legislature accepted those findings,¹⁷ which linked the Riot to
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23
24 ¹⁶ Id. at §8000.1.5.

25 ¹⁷ See 74 Okl. St. Ann. §8000.1.

1
2 racial violence throughout Oklahoma. The Commission's findings
3 determined that:

4 "The root causes of the Riot reside deep in the
5 history of race relations in Oklahoma and Tulsa which
6 included the enactment of Jim Crow laws, acts of
7 racial violence (not the least of which was the 23
8 lynchings of African-Americans versus only one white
9 from 1911) against African-Americans in Oklahoma, and
10 other actions that had the effect of 'putting African-
11 Americans in Oklahoma in their place' and to prove to
12 African-Americans that the forces supportive of
13 segregation possessed the power to 'push down, push
14 out, and push under' African-Americans in Oklahoma."¹⁸

15 23. In the aftermath of the Riot, THE STATE OF
16 OKLAHOMA and the CITY OF TULSA impeded the Plaintiffs' attempts
17 to rebuild their lives. The CITY OF TULSA acted quickly to
18 apply zoning restrictions to Greenwood that rendered
19 reconstruction of the destroyed dwellings prohibitively
20 expensive. When the zoning regulations were declared unlawful,
21 Defendant the CITY OF TULSA refused to provide economic
22 compensation or to help the victims, many of whom remained
23 housed in tents through the fall and into the winter of 1921.

24 24. THE STATE OF OKLAHOMA and the CITY OF TULSA
25 acted quickly to suppress talk of the Riot and the survivors'
26 attempts to seek legal redress. Efforts to seek relief from the
court system were unsuccessful and futile.

¹⁸ Id. at §8000.1.1."

1
2 25. Because of the Klan's influence throughout the
3 legal system, African American victims of the Riot quickly
4 learned that they could not count on the legal system for
5 restitution.¹⁹ The Klan, already a feature of Oklahoma life
6 before the Riot, became entrenched at all levels of the Oklahoma
7 establishment in the months and years following the Riot.
8 Despite their best efforts to use the court system, African
9 Americans were subjected to discriminatory decision making
10 rather than justice. For example, a grand jury called to
11 determine the causes of the Riot issued indictments against a
12 large number of African Americans. Fearing this, many of them
13 fled town. Defendant the CITY OF TULSA also refused to pay any
14 restitution to the African American survivors of the Riot: the
15 only restitution paid was to white gun-shop owners whose
16 business had been looted. While some African Americans filed
17 lawsuits at the time, over 100 of them were dismissed before
18 even receiving a hearing in the State Of Oklahoma's courts.²⁰ Of
19 the two cases that were heard by the Court, one, filed by Mabel
20
21

22 ¹⁹ The Klan's influence also made legislative efforts to
23 obtain restitution impossible.
24

25 ²⁰ Alfred Brophy, Reconstructing the Dreamland 95-97 (2002).
26

1
2 Allen, was dismissed before the jury deliberated,²¹ and the
3 Oklahoma Supreme Court dismissed the other on appeal.²²

4 26. Legal redress was also stymied by Oklahoma
5 common law doctrine, which unconstitutionally limited municipal
6 liability.²³ Precedent applied from Oklahoma's Territorial Court
7 made it difficult, if not impossible, for Riot victims to
8 sustain a claim against the CITY OF TULSA or its actors absent
9 ratification by the City Council.²⁴

10 27. The legislature of the State Of Oklahoma adopted
11 many of the Commission's findings by statute in 2001 and made
12 specific reference to the "'conspiracy of silence' surrounding
13
14

15
16 ²¹ Allen v. Tulsa, Tulsa County District Court, Case No.
17 16,013.

18 ²² See Redfearn v. American Central Insurance Company, 243 P.
19 929 (Okla. 1926). See Alfred Brophy, Assessing State and City
20 Culpability: The Riot and the Law, published with Commission
21 Report, 153, 157-58 (2001).

22 ²³ See Alfred L. Brophy, The Riot in the Oklahoma Supreme
23 Court, 54 Okla. L. Rev. 67 (2001).

24 ²⁴ See Wallace v. City of Norman, 60 Pacific 108 (Okla. Terr.
25 1900).

1
2 the events in Tulsa of May 31-June 1, 1921, and their
3 aftermath."²⁵ According to the legislature:

4 "Perhaps the most repugnant fact regarding the history
5 of the 1921 Riot is that it was virtually forgotten,
6 with the notable exception of those who witnessed it
7 on both sides, for seventy-five (75) years. This
8 'conspiracy of silence' served the dominant interests
9 of the state during that period which found the riot a
10 'public relations nightmare' that was 'best to be
11 forgotten, something to be swept well beneath
12 history's carpet' for a community which attempted to
13 attract new businesses and settlers."²⁶

14 28. In 1997, in an effort to end the "conspiracy of
15 silence"²⁷ and to promote a discussion involving the whole
16 community of the CITY OF TULSA and THE STATE OF OKLAHOMA, THE
17 STATE OF OKLAHOMA created the Oklahoma Commission to Study the
18 Riot of 1921. The Commission was designed to make whole a
19 fractured community still suffering from the legacy of silence
20 surrounding the Riots. Specifically, the Commission was charged
21 with:

22 "undertak[ing] a study to develop a historical record
23 of the 1921 Riot including the identification of [any]
24 person[] who:

- 25 1. was an actual resident of the Greenwood area

26
²⁵ Id. at §8000.1.5. See also Brent Staples, Unearthing a
Riot, NY Times, December 19, 1999, Section 6 at 64.

²⁶ Id. at §8000.1.4 (emphasis added).

²⁷ Id. at §8000.1.5.

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2 or community of the City of Tulsa on or about May 31,
3 1921, or June 1, 1921; or

4 2. sustained an identifiable loss to their
5 person, personal relations, real property, personal
6 property or other loss as a result of . . . the 1921
7 Riot."²⁸

8 29. The Commission was empowered to "produce a
9 written report of its findings and recommendations [for the
10 Oklahoma legislature] . . . contain[ing] specific
11 recommendations regarding whether or not reparations can or
12 should be made and the appropriate methods to achieve the
13 recommendations made in the final report," by February 28, 2001.

14 30. The Commission found that, to this day,
15 Oklahoma, and in particular, Tulsa, remains racially divided.
16 The legislature, in adopting the Commission's findings
17 recognized that reconciliation begins through knowledge of the
18 past, followed by acceptance of the past, and finally atonement
19 through compensation to the survivors and their heirs. The
20 Commission drew upon testimony of a large number of Oklahomans,
21 both African American and white, in compiling its record. The
22 Defendants refuse to make restitution for their actions prior to
23 and during the Riot, and in perpetuating a "conspiracy of
24

25 ²⁸ Id. at §8201.

1
2 silence"²⁹ after the Riot until the creation of the Commission
3 itself.

4 31. In the wake of its findings, "The
5 Commission . . . turned the responsibility for how the State Of
6 Oklahoma will respond to the historical record to the 48th
7 Oklahoma Legislature." 74 Okl. St. Ann. §8000.1.5 (West 2002).
8 The legislature found that:

9 "The documentation assembled by The 1921 Riot
10 Commission provides strong evidence that some local
11 municipal and county officials failed to take actions
12 to calm or contain the situation once violence erupted
13 and, in some cases, became participants in the
14 subsequent violence which took place on May 31 and
15 June 1, 1921, and even deputized and armed many whites
16 who were part of a mob that killed, looted, and burned
17 down the Greenwood area."³⁰

18 "The staggering cost of the Riot included the deaths
19 of an estimated 100 to 300 persons, the vast majority
20 of whom were African-Americans, the destruction of
21 1,256 homes, virtually every school, church and
22 business, and a library and hospital in the Greenwood
23 area, and the loss of personal property caused by
24 rampant looting by white rioters. The Riot Commission
25 estimates that the property costs in the Greenwood
26 district were approximately \$2 million in 1921 dollars
or \$16,752,600 in 1999 dollars. Nevertheless, there
were no convictions for any of the violent acts
against African-Americans or any insurance payments to
African-American property owners who lost their homes
or personal property as a result of the Riot.
Moreover, local officials attempted to block the
rebuilding of the Greenwood community by amending the

23
24 ²⁹ Id. at §8000.1.5.

25 ³⁰ Id. at §8000.1.2 (emphasis added).

1
2 Tulsa building code to require the use of fire-proof
3 material in rebuilding the area thereby making the
4 costs prohibitively expensive."³¹

5 "The 48th Oklahoma Legislature in enacting the 1921
6 Riot Reconciliation Act of 2001 concurs with the
7 conclusion of The 1921 Riot Commission [T]his
8 response recognizes that there were moral
9 responsibilities at the time of the riot which were
10 ignored and has been ignored ever since rather than
11 confront the realities of an Oklahoma history of race
12 relations that allowed one race to 'put down' another
13 race. Therefore, it is the intention of the Oklahoma
14 Legislature in enacting the 1921 Riot Reconciliation
15 Act of 2001 to freely acknowledge its moral
16 responsibility on behalf of the state of Oklahoma and
17 its citizens that no race of citizens in Oklahoma has
18 the right or power to subordinate another race today
19 or ever again."³²

20 32. THE STATE OF OKLAHOMA and the CITY OF TULSA
21 empowered, encouraged, and furthered the illegal brutalization
22 of African Americans by whites during and after the race Riot.
23 From Defendants' acceptance of their moral responsibility to
24 atone for these acts logically flows the obligation that they
25 accept their legal responsibility as well.

26 33. The conspiracy of silence fell particularly hard
on the African American citizens of Oklahoma. African Americans
were not allowed to speak of their experiences,³³ and were not

31 Id. at §8000.1.3 (emphasis added).

32 Id.

33 See John Hope Franklin and Scott Ellsworth, History Knows

1
2 believed when they did. Many of the survivors and their
3 families suffered a deep psychological scarring, as one of the
4 purposes of the Riot and its aftermath — which lingers to this
5 day throughout the African American community in Tulsa — was to
6 diminish the sense of security of Greenwood African Americans,
7 to place them in a subservient condition, and to enforce a
8 racial caste system that privileged whites and disadvantaged and
9 demeaned African Americans. Many of the Riot survivors are
10 still hesitant to talk about the events surrounding the Riot and
11 its aftermath. Many of them still believe that the state and
12 municipal government will punish them for discussing openly what
13 happened during the Riot.

14
15 34. According to the Report of the Oklahoma
16 Commission to Study the Riot of 1921 ("Commission Report"), "The
17 1921 riot is, at once, a representative historical example and a
18 unique historical event. It has many parallels in the pattern of

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22 No Fences: An Overview, published with the Commission Report 21,
23 26-28 (2001) (discussing suppression of discussion of Riot).

24 See also Brent Staples, Unearthing a Riot, NY Times, December
25 19, 1999, Section 6 at 64 (same).

1
2 past events, but it has no equal for its violence and its
3 completeness."³⁴

4 35. The Commission was formed with the intent of
5 determining the causes of and liabilities for the 1921 Tulsa
6 Riot. The survivors were led to expect that THE STATE OF
7 OKLAHOMA and the CITY OF TULSA would abide by the findings of
8 the Commission. Instead, it appears that despite the
9 concurrence in and acknowledgment of the facts establishing
10 their complicity in the Riot and its consequences, the state and
11 municipality have decided to wait for the survivors, all of them
12 in excess of eighty-years-old, to die off so that the problem
13 will "silently" pass away.

14 36. Defendants continue to fail to abide by the
15 recommendation of the Commission, and refuse to provide redress
16 to the Plaintiffs who are direct victims of a Riot that killed
17 between 100-300 African American men, women, and children, and
18 resulted in the looting and destruction of their property.

19 37. Plaintiffs also seek to establish an educational
20 fund³⁵ for the Greenwood District of Tulsa to ensure that THE
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23 ³⁴ Commission Report at 19.

24 ³⁵ The Tulsa Reconciliation Education and Scholarship Program
25 ("TRESP") established by 70 Okl. St. Ann. §2621 (West 2002) has

1
2 STATE OF OKLAHOMA and the CITY OF TULSA can come together as a
3 community united, with the common goal of promoting racial
4 reconciliation and understanding. For too long, Defendants have
5 silenced Plaintiffs and discounted their testimony. In so
6 doing, Defendants have only perpetuated the divisions that were
7 solidified during and after the Riot. Education about the past
8 must be coupled with restitution or reparations to enable the
9 community to move forward, together, in the common purpose of
10 bettering the lives of all the citizens of Oklahoma.

11 THE PARTIES

12 A. Plaintiffs

13 i. Survivors

14 38. Plaintiffs file this action against THE STATE OF
15 OKLAHOMA; THE CITY OF TULSA; THE CHIEF OF POLICE OF THE CITY OF
16 TULSA; and THE CITY OF TULSA POLICE DEPARTMENT.

17 39. Plaintiff JOHN MELVIN ALEXANDER is an individual
18 residing in the State of Oklahoma. Plaintiff was born on
19 December 22, 1919. At the time of the Riot, Plaintiff lived at
20 1621 North Norfolk Street in the Greenwood District of Tulsa.

21
22 never been properly funded. At the very least, plaintiffs seek
23 to require the State to adequately fund the TRESP, as required
24 by 70 Okl. St. Ann. §§2620-2627.

1
2 During the Riot, the rioting white mob took Plaintiff's father
3 to the Ball Park holding camp; Plaintiff was unlawfully detained
4 against his will in Brady Theater detention center. Plaintiff
5 went on to fight for the United States in WWII & Korea. As
6 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
7 §8205 (West 2000)), the Executive Director of the Oklahoma
8 Historical Society has certified that Plaintiff is a Riot
9 Survivor.

10 40. Plaintiff JUANITA DELORES BURNETT ARNOLD is an
11 individual residing in the State of Oklahoma. Plaintiff was
12 born on July 27, 1909. At the time of the Riot, Plaintiff lived
13 at 1000 N. Lansing Street in the Greenwood District of Tulsa.
14 During the Riot, Plaintiff fled from the rioting white mob with
15 her mother and father. As required by the Oklahoma State
16 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
17 Executive Director of the Oklahoma Historical Society has
18 certified that Plaintiff is a Riot Survivor.

19 41. Plaintiff J.B. BATES is an individual residing
20 in the State of Oklahoma. Plaintiff was born on June 13, 1916.
21 At the time of the Riot, Plaintiff lived between Greenwood and
22 Marshall Street in the Greenwood District of Tulsa. Plaintiff's
23 grandfather died during the Riot. Plaintiff's property was
24 destroyed during the Riot, although the rioting white mob did
25

1
2 not burn down his family home. Plaintiff and his parents had to
3 leave their house and stay with relatives in Tulsa and were
4 unable to return to their home until at least two week after the
5 Riot. As required by the Oklahoma State Legislature (74 Okl.
6 Stat. Ann. §8205 (West 2000)), the Executive Director of the
7 Oklahoma Historical Society has certified that Plaintiff is a
8 Riot Survivor.

9 42. Plaintiff ESSIE LEE JOHNSON BECK is an
10 individual residing in the State of Oklahoma. Plaintiff was
11 born on April 29, 1915. Plaintiff's property was destroyed
12 during the Riot. At the time of the Riot, Plaintiff lived in
13 the Greenwood District of Tulsa. As required by the Oklahoma
14 State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
15 Executive Director of the Oklahoma Historical Society has
16 certified that Plaintiff is a Riot Survivor.

17 43. Plaintiff JAMES D. BELL is an individual
18 residing in the State of Oklahoma. Plaintiff was born on June
19 12, 1921. At the time of the Riot, Plaintiff lived at 418 N.
20 Cincinnati Avenue in the Greenwood District of Tulsa. Plaintiff
21 was born prematurely as a result of the shock his mother
22 suffered during the Riot. Plaintiff's property was destroyed
23 during the Riot, including his family home. As required by the
24 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
25

1
2 2000)), the Executive Director of the Oklahoma Historical
3 Society has certified that Plaintiff is a Riot Survivor.

4 44. Plaintiff PHINES BELL is an individual residing
5 in the State of Washington. Plaintiff was born on August 16,
6 1918. At the time of the Riot, Plaintiff lived in the Greenwood
7 District of Tulsa. Plaintiff suffered property damage during the
8 Riot. As required by the Oklahoma State Legislature (74 Okl.
9 Stat. Ann. §8205 (West 2000)), the Executive Director of the
10 Oklahoma Historical Society has certified that Plaintiff is a
11 Riot Survivor.

12 45. Plaintiff FRANCES BLACKWELL is an individual
13 residing in the State of Oklahoma. Plaintiff was born on
14 February 12, 1913. At the time of the Riot, Plaintiff lived in
15 the Greenwood District of Tulsa. The rioting white mob forced
16 Plaintiff to flee her home for several days to avoid capture by
17 Defendant's agents. As required by the Oklahoma State
18 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
19 Executive Director of the Oklahoma Historical Society has
20 certified that Plaintiff is a Riot Survivor.

21 46. Plaintiff JUANITA WILLIAMS BLAKELY is an
22 individual residing in the State of Oklahoma. Plaintiff was
23 born on August 5, 1914. Plaintiff resided at Frankfort Place,
24 one block from Greenwood. Plaintiff's family property was
25

1
2 destroyed during the Riot. Plaintiff hid under the bed when
3 members of the rioting white mob entered her house and set fire
4 to the curtains. Plaintiffs and family fled from the burning
5 house and saw airplanes over Greenwood and Archer dropping
6 incendiary devices. Plaintiff's mother found a relative to take
7 Plaintiff to Gerard, Kansas while Plaintiff's mother remained in
8 Tulsa and was detained at the Fairgrounds. Plaintiff's home was
9 destroyed in the fire. Plaintiff's uncle, Osborne Monroe, owned
10 a skating rink and a boarding house, both of which were
11 destroyed in the Riot. As required by the Oklahoma State
12 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
13 Executive Director of the Oklahoma Historical Society has
14 certified that Plaintiff is a Riot Survivor.

15 47. Plaintiff JUANITA SMITH BOOKER is an individual
16 residing in the State of Oklahoma. Plaintiff was born on
17 January 15, 1914. At the time of the Riot, Plaintiff lived on
18 Archer Street in the Greenwood District of Tulsa. Plaintiff's
19 property was destroyed during the Riot. The rioting white mob
20 burned her family home to the ground and destroyed it completely
21 with the exception of an upright victrola, which was the only
22 item of personal property the family managed to salvage after
23 the Riot. Plaintiff and her family were temporarily housed at
24 the former Booker T. Washington School after the Riot. As
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1
2 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
3 §8205 (West 2000)), the Executive Director of the Oklahoma
4 Historical Society has certified that Plaintiff is a Riot
5 Survivor.

6 48. Plaintiff KINNEY BOOKER is an individual
7 residing in the State of Oklahoma. Plaintiff was born on March
8 21, 1913. At the time of the Riot, Plaintiff lived at 320 North
9 Hartford Street in the Greenwood District of Tulsa. During the
10 Riot, he hid in an attic while the white rioters set fire to his
11 home. Plaintiff's family property was destroyed during the Riot.
12 Plaintiff was forced to flee his house by the rioting white mob.
13 He was lucky to escape before it burned to the ground. Plaintiff
14 was unlawfully detained against his will at the Convention Hall
15 detention center. As required by the Oklahoma State Legislature
16 (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director
17 of the Oklahoma Historical Society has certified that Plaintiff
18 is a Riot Survivor.

19 49. Plaintiff DOROTHY BOOKER BOULDING is an
20 individual residing in the State of Missouri. Plaintiff was born
21 on December 2, 1915. At the time of the Riot, Plaintiff lived
22 in the Greenwood District of Tulsa. Plaintiff is the sister of
23 Plaintiff KINNEY BOOKER. Plaintiff suffered property damage
24 during the Riot. Plaintiff was forced to flee her house by the
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rioting white mob. Plaintiff was unlawfully detained against her will in one of the detention centers. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

50. Plaintiff JEANETTE McNEAL BRADSHAW is an individual residing in the State of Illinois. Plaintiff was born on June 28, 1918. At the time of the Riot, Plaintiff lived at 911 Fairview Street in the Greenwood District of Tulsa. Plaintiff is the sister of Plaintiff THERESSA CORNELLA McNEAL GILLIAM. Plaintiffs' mother was a prominent businesswoman, owning a boarding house and working as a dressmaker with a large inventory of fabric and dresses Plaintiff's family property was destroyed during the Riot. The business and its stock were completely lost during the Riot. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

51. Plaintiff TERESA EARLEE BRIDGES DYSART is an individual residing in the State of Texas. Plaintiff was born on December 11, 1917. At the time of the Riot, Plaintiff lived at 514 N. Hartford in the Greenwood District of Tulsa. Plaintiff's family property was destroyed during the Riot, including two

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2 pianos and an organ, some hand-made Indian jewelry, and a
3 Rooflee model car. As required by the Oklahoma State
4 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
5 Executive Director of the Oklahoma Historical Society has
6 certified that Plaintiff is a Riot Survivor.

7 52. Plaintiff JOHNNIE L. GRAYSON BROWN is an
8 individual residing in the State of Oklahoma. Plaintiff was born
9 on July 5, 1914. At the time of the Riot, Plaintiff lived at 31
10 N. Kenosha Street in the Greenwood District of Tulsa with her
11 family. Plaintiff's family property was destroyed during the
12 Riot. The rioting white mob ransacked her home. Plaintiff,
13 along with her aunt, Corene Grayson Edwards, was unlawfully
14 detained against her will at the Fairground detention center for
15 several days. As required by the Oklahoma State Legislature (74
16 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of
17 the Oklahoma Historical Society has certified that Plaintiff is
18 a Riot Survivor.

19 53. Plaintiff LEE ELLA STROZIER BROWN is an
20 individual residing in the State of California. Plaintiff was
21 born on January 29, 1919. At the time of the Riot, Plaintiff
22 lived in the Greenwood District of Tulsa. As required by the
23 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
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2 2000)), the Executive Director of the Oklahoma Historical
3 Society has certified that Plaintiff is a Riot Survivor.

4 54. Plaintiff CLARENCE BRUNER is an individual
5 residing in the State of Oklahoma. Plaintiff was born on July
6 28, 1904. At the time of the Riot, Plaintiff lived in the
7 Greenwood District of Tulsa. As required by the Oklahoma State
8 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
9 Executive Director of the Oklahoma Historical Society has
10 certified that Plaintiff is a Riot Survivor.

11 55. Plaintiff LULA BELLE LACY BULLOCK is an
12 individual residing in the State of Missouri. Plaintiff was born
13 on April 22, 1920. At the time of the Riot, Plaintiff lived in
14 Bullette Street in the Greenwood District of Tulsa. Plaintiff
15 is sister of Plaintiff ARTIE LACY JOHNSON. Plaintiffs fled the
16 Rioting white mob. Plaintiffs' property was destroyed during
17 the Riot: their family store and home were burned down. As
18 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
19 §8205 (West 2000)), the Executive Director of the Oklahoma
20 Historical Society has certified that Plaintiff is a Riot
21 Survivor.

22 56. Plaintiff JOE R. BURNS is an individual residing
23 in the State of Oklahoma. Plaintiff was born on February 5,
24 1915. At the time of the Riot, Plaintiff lived at 517 Latimer
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2 Court in the Greenwood District of Tulsa. Plaintiff fled with
3 his father and mother to Mohawk Park, hiding in the shrubs and
4 trees in the creek. His family was later captured and placed in
5 detention centers. Plaintiff was unlawfully detained against
6 his will in the Convention Center detention center. As required
7 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
8 (West 2000)), the Executive Director of the Oklahoma Historical
9 Society has certified that Plaintiff is a Riot Survivor.

10 57. Plaintiff ROSA L. GREEN BYNUM is an individual
11 residing in the state of Maryland. Plaintiff was born on August
12 14, 1920. At the time of the Riot, Plaintiff lived on N.
13 Detroit Street. Plaintiff's family property was destroyed.
14 Plaintiff and her family were held in detention with other
15 families for several days. Plaintiff was unlawfully detained
16 against her will in one of the detention centers. As required by
17 the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
18 2000)), the Executive Director of the Oklahoma Historical
19 Society has certified that Plaintiff is a Riot Survivor.

20 58. Plaintiff MURIEL MIGNON LILLY CABELL is an
21 individual residing in the State of California. Plaintiff was
22 born on December 29, 1913. At the time of the Riot, Plaintiff
23 lived on Elgin Street in the Greenwood District of Tulsa.
24 Plaintiff is the sister of Plaintiffs HATTIE LILLY DUNN and
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JIMMIE LILLY FRANKLIN. Plaintiffs' parents owned a home with four bedrooms, one bathroom, a living room, a dining room, and an office used by their father, who was a photographer. Their father had a photographic studio, a dark room, and several large cameras, and also owned a Ford Sedan. Plaintiffs' uncle, Fred Wells, was a prominent Tulsa physician and surgeon, who owned a Ford Coupe and medical equipment. Plaintiff's family property was destroyed during the Riot. Their home was the third house burned during the Riot. The rioting white mob destroyed their home and all their family's possessions. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

59. Plaintiff BEATRICE CAMPBELL-WEBSTER is an individual residing in the State of California. Plaintiff was born on March 5, 1914. At the time of the Riot, Plaintiff lived with her family at 906 N. Latimer Street in the Greenwood District of Tulsa. Plaintiff's family property was destroyed during the Riot. Plaintiff lost her home and furnishings, including a piano and a victrola, leather couches and chairs, and miscellaneous other possessions. Plaintiff fled her home to avoid the rioting white mob. Plaintiff was unlawfully detained against her will in one of the detention centers. Plaintiff

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2 escaped with her family to Alsuma, a nearby town, where the
3 National Guard captured them. Her father was sent to the Ball
4 Park detention center, and the rest of the family was sent to
5 the Convention Hall detention center. As required by the
6 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
7 2000)), the Executive Director of the Oklahoma Historical
8 Society has certified that Plaintiff is a Riot Survivor.

9 60. Plaintiff JAMES DALE CARTER is an individual
10 residing in the State of Missouri. Plaintiff was born on
11 November 26, 1920. Plaintiff is the son of Plaintiff ROSELLA
12 CARTER. Plaintiff resided on Greenwood at the time of the Riot.
13 Plaintiff's property was destroyed during the course of the Riot
14 and Plaintiff's fled from the rioting white mob, his mother
15 carrying him forty miles on her back to safety. As required by
16 the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
17 2000)), the Executive Director of the Oklahoma Historical
18 Society has certified that Plaintiff is a Riot Survivor.

19 61. Plaintiff ROSELLA CARTER is an individual
20 residing in the State of Missouri. Plaintiff was born on June
21 20, 1900. Plaintiff is the mother of Plaintiff JAMES DALE
22 CARTER. Plaintiff resided on Greenwood at the time of the Riot.
23 Plaintiff's property was destroyed during the course of the Riot
24 and Plaintiff's fled from the rioting white mob, carrying her
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2 son on her back forty miles to escape to safety. As required by
3 the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
4 2000)), the Executive Director of the Oklahoma Historical
5 Society has certified that Plaintiff is a Riot Survivor.

6 62. Plaintiff SAMUEL CASSIUS is an individual
7 residing in the State of New Jersey. Plaintiff was born on May
8 2, 1921. At the time of the Riot, Plaintiff lived in the
9 Greenwood District of Tulsa. As required by the Oklahoma State
10 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
11 Executive Director of the Oklahoma Historical Society has
12 certified that Plaintiff is a Riot Survivor.

13 63. Plaintiff NAOMI HOOKER CHAMBERLAIN is an
14 individual residing in the State of New York. Plaintiff was born
15 on January 26, 1918. At the time of the Riot, Plaintiff lived
16 on Independence Street in a house valued at \$10,000 in 1921
17 dollars. Her parents also owned a large store at 123 N.
18 Greenwood Avenue in the Greenwood District of Tulsa. Plaintiff
19 is the sister of Plaintiffs DR. OLIVIA J. HOOKER and SAMUEL L.
20 HOOKER. Plaintiff's family property was destroyed during the
21 Riot. White rioters damaged Plaintiffs' home during the Riot,
22 and the rioting white mob completely destroyed Plaintiffs'
23 parents' business, which was described as "a total loss." The
24 estimated value of the goods destroyed amounted to \$100,000 in
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2 1921 dollars. Plaintiffs' father filed a lawsuit against the
3 insurance company for the value of the destroyed property, but
4 the case was thrown out in 1926 or 1927. As required by the
5 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
6 2000)), the Executive Director of the Oklahoma Historical
7 Society has certified that Plaintiff is a Riot Survivor.

8 64. Plaintiff MILDRED MITCHELL CHRISTOPHER is an
9 individual residing in the State of Florida. Plaintiff was born
10 on October 19, 1913. At the time of the Riot, Plaintiff lived
11 on King Street in the Greenwood District of Tulsa. Plaintiff's
12 property was destroyed during the Riot: her home was burned and
13 property was taken from the house including a piano and silver
14 flatware. Plaintiff fled to Broken Arrow, Oklahoma with
15 plaintiff's mother and sisters. Plaintiff stayed in an
16 abandoned stone house in Broken Arrow with other families
17 fleeing the Riot for several days until the National Guard and
18 the Red Cross located them. Plaintiff and her family were
19 unlawfully detained against their will in the Fairground
20 detention center until her mother's employer "claimed" them. As
21 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
22 §8205 (West 2000)), the Executive Director of the Oklahoma
23 Historical Society has certified that Plaintiff is a Riot
24 Survivor.

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2 65. Plaintiff MILDRED LUCAS CLARK is an individual
3 residing in the State of Arkansas. Plaintiff was born October
4 15, 1921, four months after the Riot. Plaintiff's mother
5 resided at 1012 N. Elgin at the time of the Riot. Plaintiff's
6 mother fled to the home of white neighbors to escape the Riot
7 and later was held at the Convention Center for several days.
8 Plaintiff's family property was destroyed during the Riot.
9 Plaintiff's mother died shortly after the birth of Plaintiff due
10 to the poor living conditions for Greenwood residents after the
11 Riot. As required by the Oklahoma State Legislature (74 Okl.
12 Stat. Ann. §8205 (West 2000)), the Executive Director of the
13 Oklahoma Historical Society has certified that Plaintiff is a
14 Riot Survivor.

15 66. Plaintiff OTIS GRANVILLE CLARK is an individual
16 residing in the State of Oklahoma. Plaintiff was born on
17 February 13, 1903. At the time of the Riot, Plaintiff lived at
18 805 E. Archer Street in the Greenwood District of Tulsa.
19 During the Riot, Plaintiff was caught in the middle of a gun
20 battle. He was sprayed with blood when his friend was shot
21 through the hand by a white sniper, and both of them fled for
22 their lives. His cousin's café was burned to the ground. His
23 stepfather disappeared during the Riot and was never seen again.
24 Plaintiff's family property was destroyed during the Riot. His
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2 home was burned to the ground. As required by the Oklahoma
3 State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
4 Executive Director of the Oklahoma Historical Society has
5 certified that Plaintiff is a Riot Survivor.

6 67. Plaintiff SANDY CLARK is an individual residing
7 in the State of Oklahoma. Plaintiff was born in 1907. At the
8 time of the Riot, Plaintiff lived in the Greenwood District of
9 Tulsa. As required by the Oklahoma State Legislature (74 Okl.
10 Stat. Ann. §8205 (West 2000)), the Executive Director of the
11 Oklahoma Historical Society has certified that Plaintiff is a
12 Riot Survivor.

13 68. Plaintiff BLANCHE CHATMAN COLE is an individual
14 residing in the State of Oklahoma. Plaintiff was born on April
15 21, 1904. At the time of the Riot, Plaintiff lived in a rented
16 home in the Greenwood District of Tulsa. During the Riot, her
17 family fled to Clarksville, Oklahoma. Plaintiff's family
18 property was destroyed during the Riot. All the family's
19 belongings were burned or stolen during the Riot. As required
20 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
21 (West 2000)), the Executive Director of the Oklahoma Historical
22 Society has certified that Plaintiff is a Riot Survivor.

23 69. Plaintiff WORDIE "PEACHES" MILLER COOPER is an
24 individual residing in the State of Oklahoma. Plaintiff was
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2 born on February 4, 1911. At the time of the Riot, Plaintiff
3 lived in the Greenwood District of Tulsa. As required by the
4 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
5 2000)), the Executive Director of the Oklahoma Historical
6 Society has certified that Plaintiff is a Riot Survivor.

7 70. Plaintiff CARRIE HUMPHREY CUDJOE is an
8 individual residing in the State of Oklahoma. Plaintiff was born
9 on April 6, 1921. At the time of the Riot, Plaintiff lived at
10 1211 N. Lansing Street in the Greenwood District of Tulsa.
11 Plaintiff's parents owned their own home, a horse, a cow, some
12 chickens, and miscellaneous furnishings and other items.
13 Plaintiff's family property was destroyed during the Riot.
14 Their home was burned down during the Riot, and all of
15 Plaintiff's family's possessions were destroyed or stolen.
16 Plaintiff and her family were unlawfully detained against their
17 will in one of the detention centers. Plaintiff, her mother and
18 brother fled to Mohawk Park on foot where the National Guard
19 picked them up and took them to a church at Seventh Avenue and
20 Boston Street. State and municipal officials held Plaintiff,
21 her mother, and her brother at the Church for three days.
22 Plaintiff and suffered physical injury during the Riot. Both of
23 them injured their feet while fleeing the white mob. As
24 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.

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2 §8205 (West 2000)), the Executive Director of the Oklahoma
3 Historical Society has certified that Plaintiff is a Riot
4 Survivor.

5 71. Plaintiff LAVERNE COOKSEY DAVIS is an individual
6 residing in the State of Oklahoma. Plaintiff was born on May
7 24, 1904. At the time of the Riot, Plaintiff lived in South
8 Tulsa, which was a white district of Tulsa. Plaintiff witnessed
9 the burning of Greenwood. As required by the Oklahoma State
10 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
11 Executive Director of the Oklahoma Historical Society has
12 certified that Plaintiff is a Riot Survivor.

13 72. Plaintiff DOLLY MAE DOUFITT is an individual
14 residing in the State of California. Plaintiff was born on
15 January 11, 1920. At the time of the Riot, Plaintiff lived in
16 the Greenwood District of Tulsa. As required by the Oklahoma
17 State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
18 Executive Director of the Oklahoma Historical Society has
19 certified that Plaintiff is a Riot Survivor.

20 73. Plaintiff JAMES DURANT is an individual residing
21 in the State of Michigan. Plaintiff was born on January 27,
22 1915. At the time of the Riot, Plaintiff lived in the Greenwood
23 District of Tulsa. Plaintiff suffered property damage during the
24 Riot: his family home was burned to the ground. Plaintiff was
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2 forced to flee his house by the rioting white mob. Plaintiff
3 was physically injured during the Riot. Members of the rioting
4 white mob attacked him. Plaintiff fled from the rioting white
5 mob and hid in a bus with other Greenwood residents. As
6 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
7 §8205 (West 2000)), the Executive Director of the Oklahoma
8 Historical Society has certified that Plaintiff is a Riot
9 Survivor.

10 74. Plaintiff LUCILLE B. BUCHANAN FIGURES is an
11 individual residing in the State of Oklahoma. Plaintiff was
12 born on January 9, 1909. At the time of the Riot, Plaintiff
13 lived at 521 N. Elgin Street in the Greenwood District of Tulsa.
14 Plaintiff's family property was destroyed during the Riot.
15 Plaintiff's property was destroyed during the Riot, including
16 her family home. Plaintiff and her mother were unlawfully
17 detained against their will in one of the detention centers
18 until her mother's white employer "claimed" them from the
19 detention center. As required by the Oklahoma State Legislature
20 (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director
21 of the Oklahoma Historical Society has certified that Plaintiff
22 is a Riot Survivor.

23 75. Plaintiff ARCHIE JACKSON FRANKLIN is an
24 individual residing in the State of California. Plaintiff was
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2 born on November 11, 1915. At the time of the Riot, Plaintiff
3 lived in the Greenwood District of Tulsa. Plaintiff is the
4 brother of Plaintiff HAZEL FRANKLIN HACKETT. Plaintiff's
5 property was destroyed during the Riot, including her family
6 home. As required by the Oklahoma State Legislature (74 Okl.
7 Stat. Ann. §8205 (West 2000)), the Executive Director of the
8 Oklahoma Historical Society has certified that Plaintiff is a
9 Riot Survivor.

10 76. Plaintiff JIMMIE LILLY FRANKLIN is an individual
11 residing in the State of California. Plaintiff was born on June
12 12, 1916. At the time of the Riot, Plaintiff lived on Elgin
13 Street in the Greenwood District of Tulsa. Plaintiff is the
14 sister of Plaintiffs MURIEL MIGNON LILLY CABELL and HATTIE LILLY
15 DUNN. Plaintiff's family property was destroyed during the Riot.
16 The rioting white mob destroyed their home. As required by the
17 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
18 2000)), the Executive Director of the Oklahoma Historical
19 Society has certified that Plaintiff is a Riot Survivor.

20 77. Plaintiff JOAN HILL GAMBREL is an individual
21 residing in the State of New Jersey. At the time of the Riot,
22 Plaintiff lived in the Greenwood District of Tulsa. As required
23 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
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2 (West 2000)), the Executive Director of the Oklahoma Historical
3 Society has certified that Plaintiff is a Riot Survivor.

4 78. Plaintiff ERNESTINE GIBBS is an individual
5 residing in the State of Oklahoma. Plaintiff was born on
6 December 15, 1902. At the time of the Riot, Plaintiff lived on
7 King Street, in the middle of a train track area. Plaintiff
8 fled from her home to avoid the rioting white mob. Her home was
9 destroyed, along with all the family's possessions, during the
10 Riot. Plaintiff was unlawfully detained against her will at the
11 Fairground detention center. Plaintiff's family property was
12 destroyed during the Riot. Plaintiff's brother, along with many
13 other African American men, only evaded the rioting white mob by
14 jumping into a river and swimming to freedom. As required by
15 the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
16 2000)), the Executive Director of the Oklahoma Historical
17 Society has certified that Plaintiff is a Riot Survivor.

18 79. Plaintiff HAROLD GIBBS is an individual residing
19 in the State of Oklahoma. Plaintiff was born on January 16,
20 1920. At the time of the Riot, Plaintiff lived on Jasper Street
21 in the Greenwood District of Tulsa. Plaintiff's family property
22 was destroyed during the Riot, including his father's wagon and
23 two horses. Plaintiff and his mother were unlawfully detained
24 against their will in a detention center. As required by the
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2 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
3 2000)), the Executive Director of the Oklahoma Historical
4 Society has certified that Plaintiff is a Riot Survivor.

5 80. Plaintiff THERESSA CORNELLA McNEAL GILLIAM is an
6 individual residing in the State of Illinois. Plaintiff was born
7 on October 11, 1911. At the time of the Riot, Plaintiff lived
8 in the Greenwood District of Tulsa with her family. Plaintiff
9 is the sister of Plaintiff JEANEATTE MCNEAL BRADSHAW.

10 Plaintiff's family property was destroyed during the Riot.
11 Their mother's boarding house and dressmaking business were
12 completely destroyed during the Riot. As required by the
13 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
14 2000)), the Executive Director of the Oklahoma Historical
15 Society has certified that Plaintiff is a Riot Survivor.

16 81. Plaintiff EDWARD L. GIVENS is an individual
17 residing in the State of North Carolina. At the time of the
18 Riot, Plaintiff lived in the Greenwood District of Tulsa. As
19 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
20 §8205 (West 2000)), the Executive Director of the Oklahoma
21 Historical Society has certified that Plaintiff is a Riot
22 Survivor.

23 82. Plaintiff BERTHA GUYTON is an individual
24 residing in Tulsa, Oklahoma. Plaintiff's was born on 1914.
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2 Plaintiff was a resident in the Greenwood district at the time
3 of the riot. As required by the Oklahoma State Legislature (74
4 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of
5 the Oklahoma Historical Society has certified that Plaintiff is
6 a Riot Survivor.

7 83. Plaintiff HAZEL FRANKLIN HACKETT is an
8 individual residing in the State of Alabama. Plaintiff was born
9 on October 11, 1918. At the time of the Riot, Plaintiff lived
10 at 604 E. Independence Place in the Greenwood District of Tulsa.
11 Plaintiff is the sister of Plaintiff ARCHIE JACKSON FRANKLIN.
12 Plaintiff's family property was destroyed during the Riot.
13 During the Riot, the rioting white mob burned down Plaintiff's
14 family's home and destroyed all the family's possessions.
15 Plaintiff was unlawfully detained against her will for three
16 days at the Fairground detention center. Plaintiff was father's
17 employer "claimed" Plaintiff's father from the detention center.
18 As required by the Oklahoma State Legislature (74 Okl. Stat.
19 Ann. §8205 (West 2000)), the Executive Director of the Oklahoma
20 Historical Society has certified that Plaintiff is a Riot
21 Survivor.

22 84. Plaintiff MILDRED JOHNSON HALL is an individual
23 residing in the State of California. Plaintiff was born on
24 October 17, 1919. At the time of the Riot, Plaintiff lived in
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2 the Greenwood District of Tulsa. Plaintiff's family property was
3 destroyed during the Riot. Plaintiff's family was buying a home
4 in Greenwood that was destroyed by the white mob during the
5 Riot. Plaintiff's mother died months after the Riot from
6 tuberculosis and pneumonia resulting from her stay, during the
7 fall and winter of 1921, in the municipal tents erected after
8 the Riot. As required by the Oklahoma State Legislature (74
9 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of
10 the Oklahoma Historical Society has certified that Plaintiff is
11 a Riot Survivor.

12 85. Plaintiff NELL HAMILTON HAMPTON is an individual
13 residing in the State of Oklahoma. Plaintiff was born on March
14 4, 1911. At the time of the Riot, Plaintiff lived in the
15 Greenwood District of Tulsa. Plaintiff was forced to flee her
16 home by the rioting white mob. As required by the Oklahoma
17 State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
18 Executive Director of the Oklahoma Historical Society has
19 certified that Plaintiff is a Riot Survivor.

20 86. Plaintiff LEROY LEON HATCHER is an individual
21 residing in the State of Oklahoma. Plaintiff was born on May 23,
22 1921. At the time of the Riot, Plaintiff lived near Brady
23 Street in the Greenwood District of Tulsa. Plaintiff's family
24 property was destroyed during the Riot. The rioting white mob
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2 killed Plaintiff's father and burned down their home.
3 Plaintiff's mother carried him nine miles in an effort to avoid
4 the rioting white mob. As required by the Oklahoma State
5 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
6 Executive Director of the Oklahoma Historical Society has
7 certified that Plaintiff is a Riot Survivor.

8 87. Plaintiff MADELEINE HAYNES is an individual
9 residing in the State of California. Plaintiff was born on June
10 7, 1912. At the time of the Riot, Plaintiff lived at 544 E.
11 Pine Street in the Greenwood District of Tulsa. Plaintiff's
12 family property was destroyed during the Riot. The rioting
13 white mob burned down Plaintiff's family's home. Plaintiff was
14 detained against her will in one of the detention centers.
15 National Guardsmen took Plaintiff and her family into custody
16 and transported Plaintiff, her sister, and her mother to the
17 Ball Park detention center. As required by the Oklahoma State
18 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
19 Executive Director of the Oklahoma Historical Society has
20 certified that Plaintiff is a Riot Survivor.

21 88. Plaintiff JOYCE WALKER HILL is an individual
22 residing in the State of Kansas. Plaintiff was born on December
23 18, 1908. At the time of the Riot, Plaintiff lived at 322 N.
24 Frankfort in the Greenwood District of Tulsa. Plaintiff is the
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2 sister of Plaintiffs SAMUEL WALKER and TROY SIDNEY WALKER.
3 Plaintiff's family property was destroyed during the Riot. The
4 rioting white mob destroyed Plaintiff's family home, which was a
5 two-story, eight-room house. Plaintiff's family also ran a
6 restaurant business. By the time Plaintiff escaped from the
7 rioting white mob, both her feet were bloody from running
8 barefoot along the gravel railroad tracks. As required by the
9 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
10 2000)), the Executive Director of the Oklahoma Historical
11 Society has certified that Plaintiff is a Riot Survivor.

12 89. Plaintiff ROBERT HOLLOWAY is an individual
13 residing in the State of Oklahoma. Plaintiff was born in 1918.
14 At the time of the Riot, Plaintiff lived in the Greenwood
15 District of Tulsa. As required by the Oklahoma State
16 Legislature (74 Okl. Stat. Ann. § 8205 (West 2000)), the
17 Executive Director of the Oklahoma Historical Society has
18 certified that Plaintiff is a Riot Survivor.

19 90. Plaintiff DR. OLIVIA J. HOOKER is an individual
20 residing in the State of New York. Plaintiff was born on
21 February 12, 1915. At the time of the Riot, Plaintiff lived on
22 Independence Street in the Greenwood District of Tulsa.
23 Plaintiff is the sister of Plaintiffs NAOMI HOOKER CHAMBERLAIN
24 and SAMUEL L. HOOKER. Plaintiff's family property was destroyed
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2 during the Riot, including their home and business. As required
3 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
4 (West 2000)), the Executive Director of the Oklahoma Historical
5 Society has certified that Plaintiff is a Riot Survivor.

6 91. Plaintiff SAMUEL L. HOOKER, JR. is an individual
7 residing in the State of Illinois. Plaintiff was born on January
8 6, 1918. At the time of the Riot, Plaintiff lived on
9 Independence Street in the Greenwood District of Tulsa.

10 Plaintiff is the brother of Plaintiffs NAOMI HOOKER CHAMBERLAIN
11 and DR. OLIVIA J. HOOKER. Plaintiff's family property was
12 destroyed during the Riot, including their home and business.
13 As required by the Oklahoma State Legislature (74 Okl. Stat.
14 Ann. §8205 (West 2000)), the Executive Director of the Oklahoma
15 Historical Society has certified that Plaintiff is a Riot
16 Survivor.

17 92. Plaintiff WILHELMINA GUESS HOWELL is an
18 individual residing in the State of Oklahoma. Plaintiff was
19 born on April 25, 1907. At the time of the Riot, Plaintiff
20 lived in the Greenwood District of Tulsa. Plaintiff's family
21 property was destroyed during the Riot. The rioting white mob
22 killed Plaintiff's uncle. As required by the Oklahoma State
23 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
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2 Executive Director of the Oklahoma Historical Society has
3 certified that Plaintiff is a Riot Survivor.

4 93. Plaintiff CHARLES HUGHES is an individual
5 residing in the State of Michigan. At the time of the Riot,
6 Plaintiff lived in the Greenwood District of Tulsa. As required
7 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
8 (West 2000)), the Executive Director of the Oklahoma Historical
9 Society has certified that Plaintiff is a Riot Survivor.

10 94. Plaintiff MYRTLE WELLS HURD is an individual
11 residing in the State of Oklahoma. At the time of the Riot,
12 Plaintiff lived in the Greenwood District of Tulsa. As required
13 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
14 (West 2000)), the Executive Director of the Oklahoma Historical
15 Society has certified that Plaintiff is a Riot Survivor.

16 97. Plaintiff VERA INGRAM is an individual residing
17 in the State of Oklahoma. Plaintiff was born on March 4, 1914.
18 At the time of the Riot, Plaintiff lived at 1342 N. Lansing
19 Avenue in the Greenwood District of Tulsa. Plaintiff's family
20 property was destroyed during the Riot. Plaintiff's family fled
21 to Mowhawk Park, where the rioting white mob shot at Plaintiff's
22 family. Plaintiff was unlawfully detained against her will in
23 the Fairground detention center. As required by the Oklahoma
24 State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
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2 Executive Director of the Oklahoma Historical Society has
3 certified that Plaintiff is a Riot Survivor.

4 98. Plaintiff EUNICE CLOMAN JACKSON is an individual
5 residing in the State of Oklahoma. Plaintiff was born on August
6 17, 1903. At the time of the Riot, Plaintiff lived at 401 E.
7 Marshall Street in the Greenwood District of Tulsa. Plaintiff
8 was unlawfully detained against her will in one of the detention
9 centers. During the Riot the Tulsa police captured Plaintiff
10 and took her, along with her mother and brother, to the
11 Convention Center detention center. Plaintiff's mother's white
12 employer "claimed" the family from the Convention Center. As
13 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
14 §8205 (West 2000)), the Executive Director of the Oklahoma
15 Historical Society has certified that Plaintiff is a Riot
16 Survivor.

17 99. Plaintiff GENEVIEVE ELIZABETH TILLMAN JACKSON is
18 an individual residing in the State of Oklahoma. Plaintiff was
19 born on June 29, 1915. At the time of the Riot, Plaintiff lived
20 on Brickyard (now Frankfort) Hill in the Greenwood District of
21 Tulsa. Plaintiff's family property was destroyed during the
22 Riot. Plaintiff saw airplanes drop incendiary devices on
23 Greenwood. As required by the Oklahoma State Legislature (74
24 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of
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2 the Oklahoma Historical Society has certified that Plaintiff is
3 a Riot Survivor.

4 100. Plaintiff WILLIE BELL WHITE JACKSON is an
5 individual residing in the State of Ohio. Plaintiff was born on
6 June 4, 1910. At the time of the Riot, Plaintiff lived in the
7 Greenwood District of Tulsa. As required by the Oklahoma State
8 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
9 Executive Director of the Oklahoma Historical Society has
10 certified that Plaintiff is a Riot Survivor.

11 101. Plaintiff DR. HOBART JARRETT is an individual
12 residing in the State of New York. Plaintiff was born on June 4,
13 1910. At the time of the Riot, plaintiff lived at 1213 N.
14 Greenwood Street in the Greenwood District of Tulsa.
15 Plaintiff's parents owned a store on Easton Street, in
16 Greenwood. Plaintiff's family property was destroyed during the
17 Riot. During the Riot, the rioting white mob burned down the
18 store and looted, defecated, and urinated in their home.
19 Plaintiff was unlawfully detained against his will in one of the
20 detention centers. The National Guard took plaintiff and his
21 family into custody and transported them to the Fairground
22 detention center. As required by the Oklahoma State Legislature
23 (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director
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2 of the Oklahoma Historical Society has certified that Plaintiff
3 is a Riot Survivor.

4 102. Plaintiff ARTIE LACY JOHNSON is an individual
5 residing in the State of Missouri. Plaintiff was born on July
6 29, 1915. At the time of the Riot, plaintiff lived on Bullette
7 Street in the Greenwood District of Tulsa. Plaintiff is the
8 sister of Plaintiff LULA BELLE LACY BULLOCK. Plaintiffs fled the
9 Rioting white mob. Plaintiffs' property was destroyed during
10 the Riot: their family store and home were burned down. As
11 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
12 §8205 (West 2000)), the Executive Director of the Oklahoma
13 Historical Society has certified that Plaintiff is a Riot
14 Survivor.

15 103. Plaintiff WILMA MITCHELL JOHNSON is an individual
16 residing in the State of New Mexico. Plaintiff was born on
17 August 14, 1919. At the time of the Riot, Plaintiff lived at
18 1421 N. Kenosha Street in the Greenwood District of Tulsa.
19 During the Riot, the rioting white mob shot Plaintiff's father
20 three times, but Plaintiff's father survived. Plaintiff's family
21 property was destroyed during the Riot. The rioting white mob
22 burned down Plaintiff's parents' restaurant. As required by the
23 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
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2 2000)), the Executive Director of the Oklahoma Historical
3 Society has certified that Plaintiff is a Riot Survivor.

4 104. Plaintiff EDWARD EARVEN JONES is an individual
5 residing in the State of Oklahoma. Plaintiff was born on March
6 24, 1920. At the time of the Riot, Plaintiff lived on East
7 Davenport Avenue in the Greenwood District of Tulsa.

8 Plaintiff's mother saw airplanes piloted by white rioters drop
9 incendiary devices during the Riot. Plaintiff escaped from the
10 Riot with his family to Catoosa, Oklahoma, and then to Red Bird,
11 Oklahoma. As required by the Oklahoma State Legislature (74
12 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of
13 the Oklahoma Historical Society has certified that Plaintiff is
14 a Riot Survivor.

15 105. Plaintiff HAZEL DOLORES SMITH JONES is an
16 individual residing in Tulsa, Oklahoma. Plaintiff was born on
17 January 8, 1919. At the time of the Riot, Plaintiff lived with
18 her thirteen brothers and sisters at 1205 N. Madison Street in
19 the Greenwood District of Tulsa. Plaintiff's family property
20 was destroyed during the Riot. The rioting white mob burned
21 Plaintiff's family home to the ground. Plaintiff was unlawfully
22 detained against her will in one of the detention centers.
23 Plaintiff, along with her mother and her siblings, were taken to
24 the Fairground and were held for three or four days until
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2 Plaintiff's father came for them. As required by the Oklahoma
3 State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
4 Executive Director of the Oklahoma Historical Society has
5 certified that Plaintiff is a Riot Survivor.

6 106. Plaintiff JULIA BONTON JONES is an individual
7 residing in the State of Oklahoma. Plaintiff was born on June
8 7, 1917. At the time of the Riot, Plaintiff lived in the
9 Greenwood District of Tulsa. Plaintiff suffered property damage
10 during the Riot: her family home was burned down and all the
11 property within was destroyed or stolen. As required by the
12 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
13 2000)), the Executive Director of the Oklahoma Historical
14 Society has certified that Plaintiff is a Riot Survivor.

15 107. Plaintiff PERCY JONES is an individual residing
16 in the State of Missouri. Plaintiff was born on January May 2,
17 1921. At the time of the Riot, Plaintiff lived in the Greenwood
18 District of Tulsa. As required by the Oklahoma State Legislature
19 (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director
20 of the Oklahoma Historical Society has certified that Plaintiff
21 is a Riot Survivor.

22 108. Plaintiff THELMA THURMAN KNIGHT is an individual
23 residing in the State of Oklahoma. Plaintiff was born on May
24 30, 1915. At the time of the Riot, Plaintiff lived at 619 E.
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2 Cameron Street in the Greenwood District of Tulsa. Plaintiff's
3 family property was destroyed during the Riot. As required by
4 the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
5 2000)), the Executive Director of the Oklahoma Historical
6 Society has certified that Plaintiff is a Riot Survivor.

7 109. Plaintiff LEANNA JOHNSON LEWIS is an individual
8 residing in the State of Oklahoma. Plaintiff was born on August
9 24, 1919. At the time of the Riot, Plaintiff lived in the
10 Greenwood District of Tulsa. As required by the Oklahoma State
11 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
12 Executive Director of the Oklahoma Historical Society has
13 certified that Plaintiff is a Riot Survivor.

14 110. Plaintiff KATIE MAE JOHNSON LIVINGSTON is an
15 individual residing in the State of Oklahoma. Plaintiff was born
16 on May 6, 1921. At the time of the Riot, Plaintiff lived in the
17 Greenwood District of Tulsa. Plaintiff's family property was
18 destroyed during the Riot: Plaintiff's house was burned down.
19 Plaintiff fled from the rioting white mob with her mother and
20 sister. They went to stay with relatives in Clarksville,
21 Oklahoma, and never returned to live in Tulsa. As required by
22 the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
23 2000)), the Executive Director of the Oklahoma Historical
24 Society has certified that Plaintiff is a Riot Survivor.

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2 111. Plaintiff ALICE HIGGS LOLLIS is an individual
3 residing in the State of Oklahoma. Plaintiff was born on June
4 21, 1906. At the time of the Riot, Plaintiff lived on Pine
5 Place in the Greenwood District of Tulsa. Plaintiff was
6 unlawfully detained against her will in a segregated hospital
7 hastily created for African American Riot victims. Plaintiff,
8 who suffered from rheumatism, was forced to sleep on a mattress
9 on the ground in the hospital. As required by the Oklahoma
10 State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
11 Executive Director of the Oklahoma Historical Society has
12 certified that Plaintiff is a Riot Survivor.

13 112. Plaintiff ROANNA HENRY McCLURE is an individual
14 residing in the State of Oklahoma. Plaintiff was born on
15 February 21, 1914. At the time of the Riot, Plaintiff lived on
16 Pine Place in the Greenwood District of Tulsa. The rioting
17 white mob shot at Plaintiff and Plaintiff's grandmother from
18 Reservoir Hill. Plaintiff was unlawfully detained against her
19 will. After the Riot, Plaintiff was housed in a segregated
20 makeshift hospital on 15th Street without sufficient beds,
21 forcing her to lie on mattresses placed on the floor of the
22 building. Plaintiff and Plaintiff's grandmother were later
23 taken to the Fairgrounds where they slept on mattresses on the
24 floor. Plaintiff's family property was destroyed: their house
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2 was set on fire and partially burned. As required by the
3 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
4 2000)), the Executive Director of the Oklahoma Historical
5 Society has certified that Plaintiff is a Riot Survivor.

6 113. Plaintiff ELDORIS MAE ECTOR McCONDICHIE is an
7 individual residing in the State of Oklahoma. Plaintiff was born
8 on September 8, 1911. At the time of the Riot, Plaintiff lived
9 at 1341 N. Iroquois Street in the Greenwood District of Tulsa.
10 During the Riot, Plaintiff witnessed whites piloting airplanes
11 from which they shot at fleeing African American men, women, and
12 children. Plaintiff fled with her family to Pawhuska, Oklahoma.
13 Plaintiff still has nightmares about the Riot. As required by
14 the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
15 2000)), the Executive Director of the Oklahoma Historical
16 Society has certified that Plaintiff is a Riot Survivor.

17 114. Plaintiff CAROL SMITHERMAN MARTIN is an
18 individual residing in the State of North Carolina. Plaintiff
19 was born on December 22, 1912. At the time of the Riot,
20 Plaintiff lived in the Greenwood District of Tulsa. Plaintiff
21 suffered property damage during the Riot: her father, Andrew
22 Jackson Smitherman, owned a newspaper and his business and
23 family home was burned to the ground. Plaintiff was forced to
24 flee Tulsa by the rioting white mob. One year after the Riot,
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2 Klansmen cut off Plaintiff's uncle's ear in an act of racial
3 intimidation and violence. As required by the Oklahoma State
4 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
5 Executive Director of the Oklahoma Historical Society has
6 certified that Plaintiff is a Riot Survivor.

7 115. Plaintiff MARY TACOMA MAUPIN is an individual
8 residing in the State of Kentucky. Plaintiff was born on
9 November 9, 1905. At the time of the Riot, Plaintiff lived at
10 507 N. Detroit Avenue in the Greenwood District of Tulsa.
11 Plaintiff resided with her uncle. Plaintiff's family property
12 was destroyed during the Riot. The rioting white mob burned and
13 looted the family home. Plaintiff heard the rioting whites
14 exclaim: "These niggers have better things than we do!" What
15 the rioting white mob could not take it destroyed. Plaintiff
16 was unlawfully detained against her will in one of the detention
17 centers. As required by the Oklahoma State Legislature (74 Okl.
18 Stat. Ann. §8205 (West 2000)), the Executive Director of the
19 Oklahoma Historical Society has certified that Plaintiff is a
20 Riot Survivor.

21 116. Plaintiff WILLIE MUSGROVE MEANS is an individual
22 residing in the State of California. Plaintiff was born on
23 August 24, 1916. At the time of the Riot, Plaintiff lived in
24 the Greenwood District of Tulsa. As required by the Oklahoma
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2 State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
3 Executive Director of the Oklahoma Historical Society has
4 certified that Plaintiff is a Riot Survivor.

5 117. Plaintiff ISHMAEL S. MORAN is an individual
6 residing in the State of California. Plaintiff was born on
7 January 1, 1920. At the time of the Riot, Plaintiff lived at
8 313 N. Elgin in the Greenwood District of Tulsa. Plaintiff's
9 father worked at the National Bank of Tulsa on Boston Street.
10 Plaintiff was forced to flee his house and hide from the rioting
11 white mob. As required by the Oklahoma State Legislature (74
12 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of
13 the Oklahoma Historical Society has certified that Plaintiff is
14 a Riot Survivor.

15 118. Plaintiff RUTH DEAN NASH is an individual
16 residing in the State of Oklahoma. Plaintiff was born on
17 September 9, 1915. At the time of the Riot, Plaintiff lived on
18 Latimer Street in the Greenwood District of Tulsa. Plaintiff's
19 property was destroyed during the Riot. The rioting white mob
20 burned Plaintiff's home to the ground. To escape the Riot,
21 Plaintiff and her mother fled in a car for Muskogee, Oklahoma.
22 Plaintiff and her mother were taken to the Dunbar School and
23 later joined by her father. As required by the Oklahoma State
24 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the

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2 Executive Director of the Oklahoma Historical Society has
3 certified that Plaintiff is a Riot Survivor.

4 119. Plaintiff SIMEON L. NEAL is an individual
5 residing in the State of Illinois. Plaintiff was born on August
6 31, 1920. At the time of the Riot, Plaintiff lived in the
7 Greenwood District of Tulsa. Plaintiff's family property was
8 destroyed during the Riot: his father's tailor shop and three
9 rented homes were burned. Plaintiff was forced to flee from the
10 rioting white mob. As required by the Oklahoma State
11 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
12 Executive Director of the Oklahoma Historical Society has
13 certified that Plaintiff is a Riot Survivor.

14 120. Plaintiff ALMADGE J. NEWKIRK is an individual
15 residing in the State of California. Plaintiff was born on
16 October 13, 1913. At the time of the Riot, Plaintiff lived at
17 119 N. Greenwood Avenue in the Greenwood District of Tulsa.
18 Plaintiff's parents ran a business consisting of a bakery and a
19 confectionery shop, and a photography studio. Plaintiff's family
20 property was destroyed during the Riot. The rioting white mob
21 destroyed the buildings and the business in the course of the
22 Riot. As required by the Oklahoma State Legislature (74 Okl.
23 Stat. Ann. §8205 (West 2000)), the Executive Director of the
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2 Oklahoma Historical Society has certified that Plaintiff is a
3 Riot Survivor.

4 122. Plaintiff MYRTLE NAPIER OLIVER is an individual
5 residing in the State of Georgia. Plaintiff was born in 1911.
6 At the time of the Riot, Plaintiff lived at 526 N. Elgin Street
7 in the Greenwood District of Tulsa with her family. As required
8 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
9 (West 2000)), the Executive Director of the Oklahoma Historical
10 Society has certified that Plaintiff is a Riot Survivor.

11 123. Plaintiff JUANITA MAXINE SCOTT PARRY is an
12 individual residing in the State of Oklahoma. Plaintiff was
13 born on June 21, 1919. At the time of the Riot, Plaintiff lived
14 at 341 or 404 N. Elgin Street in the Greenwood District of
15 Tulsa. Plaintiff is the sister of Plaintiff JULIUS WARREN
16 SCOTT. Plaintiff's family home was destroyed during the Riot.
17 Plaintiff fled with her family to the home of an attorney named
18 I.H. Spears and saw people burning houses at Hartford near
19 Archer. As required by the Oklahoma State Legislature (74 Okl.
20 Stat. Ann. §8205 (West 2000)), the Executive Director of the
21 Oklahoma Historical Society has certified that Plaintiff is a
22 Riot Survivor.

23 124. Plaintiff IDA BURNS PATTERSON is an individual
24 residing in the State of Florida. Plaintiff was born on January
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2 25, 1919. Plaintiff is the sister of Plaintiff JOE R. BURNS.
3 At the time of the Riot, Plaintiff lived at 517 Latimer Court in
4 the Greenwood District of Tulsa. During the Riot Plaintiff fled
5 with her family from the rioting white mob and hid in a ravine
6 on Apache Street. Plaintiff suffered property damage during the
7 Riot. As required by the Oklahoma State Legislature (74 Okl.
8 Stat. Ann. §8205 (West 2000)), the Executive Director of the
9 Oklahoma Historical Society has certified that Plaintiff is a
10 Riot Survivor.

11 125. Plaintiff FREDDIE SCOTT PAYNE is an individual
12 residing in the State of California. Plaintiff was born on
13 November 8, 1914. Plaintiff resided in Greenwood, across from
14 Booker T. Washington High School on a steep hill behind the
15 school at the time of the riot. Plaintiff's grandfather and
16 uncle were killed during the riot. As required by the Oklahoma
17 State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
18 Executive Director of the Oklahoma Historical Society has
19 certified that Plaintiff is a Riot Survivor.

20 126. Plaintiff JOAN ALEXANDER POWDRILL is an
21 individual residing in the State of California. Plaintiff was
22 born on March 27, 1917. Plaintiff lived at 1621 North Norfolk
23 Street in the Greenwood District of Tulsa. Plaintiff is the
24 sister of Plaintiff JOHN MELVIN ALEXANDER. As required by the
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Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

127. Plaintiff ALICE PRESLEY is an individual residing in the State of California. Plaintiff was born on March 8, 1921. At the time of the Riot, Plaintiff lived in the Greenwood District of Tulsa. The Riot so traumatized Plaintiff's parents that they left Tulsa for good after the Riot. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

128. Plaintiff DeLOIS VADEN RAMSEY is an individual residing in the State of Oklahoma. Plaintiff was born on March 5, 1919. At the time of the Riot, Plaintiff lived on Elgin Street in the Greenwood District of Tulsa. Plaintiff's father owned a Vaden's Pool Hall, a popular recreation spot frequented by many notable African Americans. Plaintiff's family property was destroyed during the Riot by the rioting white mob: they even shot her dog. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

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2 129. Plaintiff CORA HAWKINS RENFRO is an individual
3 residing in the State of Illinois. Plaintiff was born on April
4 28, 1920. At the time of the Riot, Plaintiff lived in the
5 Greenwood District of Tulsa. As required by the Oklahoma State
6 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
7 Executive Director of the Oklahoma Historical Society has
8 certified that Plaintiff is a Riot Survivor.

9 130. Plaintiff SIMON R. RICHARDSON is an individual
10 residing in the State of Oklahoma. Plaintiff was born on
11 February 12, 1914. At the time of the Riot, Plaintiff lived on
12 Greenwood Avenue in the Greenwood District of Tulsa. Plaintiff
13 was unlawfully detained against his will in the Convention
14 Center detention center. As required by the Oklahoma State
15 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
16 Executive Director of the Oklahoma Historical Society has
17 certified that Plaintiff is a Riot Survivor.

18 131. Plaintiff JEWEL SMITHERMAN ROGERS is an
19 individual residing in the State of California. Plaintiff was
20 born on June 12, 1917. At the time of the Riot, Plaintiff lived
21 on Elgin Street in the Greenwood District of Tulsa. Plaintiff
22 suffered property damage during the Riot: her family home was
23 burned to the ground. As required by the Oklahoma State
24 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
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2 Executive Director of the Oklahoma Historical Society has
3 certified that Plaintiff is a Riot Survivor.

4 132. Plaintiff GERLINE HELEN WRIGHT SAYLES is an
5 individual residing in the State of Illinois. Plaintiff was
6 born on October 26, 1916. At the time of the Riot, Plaintiff
7 lived on 435 E. Booker Street in the Greenwood District of
8 Tulsa. Plaintiff suffered property damage during the Riot. As
9 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
10 §8205 (West 2000)), the Executive Director of the Oklahoma
11 Historical Society has certified that Plaintiff is a Riot
12 Survivor.

13 133. Plaintiff JULIUS WARREN SCOTT is an individual
14 residing in the State of Oklahoma. Plaintiff was born on
15 September 23, 1921. Plaintiff was born in a tent in the
16 Greenwood District of Tulsa in the immediate aftermath of the
17 Riot. Plaintiff is the brother of Plaintiff JUANITA MAXINE
18 SCOTT PERRY. Plaintiff's family home was destroyed during the
19 Riot. As required by the Oklahoma State Legislature (74 Okl.
20 Stat. Ann. §8205 (West 2000)), the Executive Director of the
21 Oklahoma Historical Society has certified that Plaintiff is a
22 Riot Survivor.

23 134. Plaintiff WILLIAM A. SCOTT is an individual
24 residing in Chicago, Illinois. Plaintiff's date of birth is
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2 March 15, 1913. Plaintiff resided at 620 N. Elgin Place at the
3 time of the Riot. Plaintiff's home burned to the ground and
4 Plaintiff and Plaintiff's parents moved to Plaintiff's
5 grandmother's house until the home could be rebuilt. As required
6 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
7 (West 2000)), the Executive Director of the Oklahoma Historical
8 Society has certified that Plaintiff is a Riot Survivor.

9 135. Plaintiff TULETA S. DUNCAN SHAWNEE is an
10 individual residing in the State of California. Plaintiff was
11 born on September 7, 1903. At the time of the Riot, Plaintiff
12 lived at 1062 N. Lansing Street in the Greenwood District of
13 Tulsa. Plaintiff fled from the rioting white mob. Plaintiff
14 left Tulsa after the Riot, never to return. As required by the
15 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
16 2000)), the Executive Director of the Oklahoma Historical
17 Society has certified that Plaintiff is a Riot Survivor.

18 136. Plaintiff VENEICE DUNN SIMMS is an individual
19 residing in the State of Oklahoma. Plaintiff was born on
20 January 21, 1905. At the time of the Riot, Plaintiff lived at
21 1027 N. Kenosha Street in the Greenwood District of Tulsa.
22 Plaintiff's family home was destroyed during the Riot.
23 Plaintiff's family fled from Tulsa, never to return. As
24 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
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2 §8205 (West 2000)), the Executive Director of the Oklahoma
3 Historical Society has certified that Plaintiff is a Riot
4 Survivor.

5 137. Plaintiff HAL "CORNBREAD" SINGER is an
6 individual residing in Nanterre, France. Plaintiff was born on
7 October 8, 1919. At the time of the Riot, Plaintiff lived on
8 Frankfort Avenue in the Greenwood District of Tulsa. Plaintiff
9 suffered property damage during the Riot. The rioting white mob
10 destroyed Plaintiff's family's home and property. As required
11 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
12 (West 2000)), the Executive Director of the Oklahoma Historical
13 Society has certified that Plaintiff is a Riot Survivor.

14 138. Plaintiff NAOMI SIPLIN is an individual residing
15 in the State of California. At the time of the Riot, Plaintiff
16 lived in the Greenwood District of Tulsa. As required by the
17 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
18 2000)), the Executive Director of the Oklahoma Historical
19 Society has certified that Plaintiff is a Riot Survivor.

20 139. Plaintiff BEULAH LOREE KEENAN SMITH is an
21 individual residing in the State of Oklahoma. Plaintiff was born
22 on May 20, 1908. At the time of the Riot, Plaintiff lived at
23 1411 N. Lansing Street in the Greenwood District of Tulsa.
24 Plaintiff's property was destroyed during the Riot. Plaintiff
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2 suffered physical injury during the Riot, as her back was
3 injured fleeing from the mob. Her family attempted to evade
4 capture by hiding in a hog pen, but her father was captured and
5 placed in a detention center. As required by the Oklahoma State
6 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
7 Executive Director of the Oklahoma Historical Society has
8 certified that Plaintiff is a Riot Survivor.

9 140. Plaintiff GOLDEN WILLIAMS SMITH is an individual
10 residing in the State of Oklahoma. Plaintiff was born on May 20,
11 1916. At the time of the Riot, Plaintiff lived on Greenwood
12 Avenue in the Greenwood District of Tulsa. Plaintiff's family
13 property was destroyed during the Riot. The rioting white mob
14 burned down Plaintiff's parents' home and the state or municipal
15 authorities removed Plaintiff's family to the Fairground
16 detention center. As required by the Oklahoma State Legislature
17 (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director
18 of the Oklahoma Historical Society has certified that Plaintiff
19 is a Riot Survivor.

20 241. Plaintiff LOLA SNEED SNOWDEN is an individual
21 residing in the State of Indiana. Plaintiff was born on January
22 21, 1915. At the time of the Riot, Plaintiff resided on Cruse
23 Street in the Greenwood District of Tulsa. Plaintiff's property
24 was destroyed in the riot, including her family home. Plaintiff
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2 and her family fled to the woods and stayed with several Native
3 American families before returning to Tulsa. Plaintiff still
4 suffers from phobias and nightmares. As required by the
5 Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
6 2000)), the Executive Director of the Oklahoma Historical
7 Society has certified that Plaintiff is a Riot Survivor.

8 142. Plaintiff JAMES L. STEWARD is an individual
9 residing in the State of Oklahoma. Plaintiff was born on July
10 12, 1917. At the time of the Riot, Plaintiff lived at 444 E.
11 Marshall Place in the Greenwood District of Tulsa. Plaintiff's
12 family property was destroyed during the Riot. The rioting
13 white mob set fire to his home while Plaintiff and his family
14 were still inside. As required by the Oklahoma State
15 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
16 Executive Director of the Oklahoma Historical Society has
17 certified that Plaintiff is a Riot Survivor.

18 143. Plaintiff DOROTHY WILSON STRICKLAND is an
19 individual residing in the State of Illinois. Plaintiff was
20 born on November 6, 1912. At the time of the Riot, Plaintiff
21 lived at 419 E. Latimer Court in the Greenwood District of
22 Tulsa. Plaintiff's family suffered property damage during the
23 Riot: her father's store was one of the first buildings burned
24 by the rioting white mob. Plaintiffs were forced to flee from
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2 the rioting white mob. Plaintiff was unlawfully detained
3 against his will in one of the detention centers. As required
4 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
5 (West 2000)), the Executive Director of the Oklahoma Historical
6 Society has certified that Plaintiff is a Riot Survivor.

7 144. Plaintiff SARAH TATUM is an individual residing
8 in the State of Connecticut. Plaintiff was born on April 20,
9 1912. At the time of the Riot, Plaintiff lived in the Greenwood
10 District of Tulsa. As required by the Oklahoma State
11 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
12 Executive Director of the Oklahoma Historical Society has
13 certified that Plaintiff is a Riot Survivor.

14 145. Plaintiff LOIS WHITE TAYLOR is an individual
15 residing in the State of California. Plaintiff was born on
16 September 27, 1919. At the time of the Riot, Plaintiff resided
17 at 1273 N. Lansing Street in the Greenwood District of Tulsa.
18 Plaintiff fled from the rioting white mob with her brother and
19 mother to Turley, Oklahoma, a town north of Tulsa. Plaintiff's
20 family property was destroyed during the Riot: all their
21 personnel possessions were destroyed or looted, and the family
22 home was damaged in the fire. As required by the Oklahoma State
23 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
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2 Executive Director of the Oklahoma Historical Society has
3 certified that Plaintiff is a Riot Survivor.

4 146. Plaintiff WILLIE MAE SHELURN THOMPSON is an
5 individual residing in the State of Oklahoma. Plaintiff was
6 born on December 4, 1912. At the time of the Riot, Plaintiff
7 lived at on Lansing Avenue in the Greenwood District of Tulsa.
8 Plaintiff's family property was destroyed during the Riot.
9 After the Riot, Plaintiff's family was so concerned for her
10 safety that they sent her to live with her father in Austin,
11 Texas. As required by the Oklahoma State Legislature (74 Okl.
12 Stat. Ann. §8205 (West 2000)), the Executive Director of the
13 Oklahoma Historical Society has certified that Plaintiff is a
14 Riot Survivor.

15 147. Plaintiff EFFIE LEE SPEARS TODD is an individual
16 residing in the State of Oklahoma. Plaintiff was born on
17 November 5, 1908. At the time of the Riot, Plaintiff lived in
18 the Greenwood District of Tulsa. Plaintiff fled from the rioting
19 white mob. Plaintiff's property was destroyed during the Riot.
20 As required by the Oklahoma State Legislature (74 Okl. Stat.
21 Ann. §8205 (West 2000)), the Executive Director of the Oklahoma
22 Historical Society has certified that Plaintiff is a Riot
23 Survivor.

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147. Plaintiff MELVIN C. TODD is an individual residing in the State of Oklahoma. Plaintiff was born on April 12, 1910. At the time of the Riot, Plaintiff lived on Elgin Street in the Greenwood District of Tulsa. Plaintiff suffered property damage during the Riot: his house was burned down. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

148. Plaintiff KATHRYN MAE TAYLOR TOLIN is an individual residing in the State of California. Plaintiff was born on August 27, 1910. At the time of the Riot, Plaintiff lived in the Greenwood District of Tulsa. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

149. Plaintiff BESSIE MAE AUSTIN VESTER is an individual residing in the State of Oklahoma. Plaintiff was born on September 28, 1919. At the time of the Riot, Plaintiff lived in the Greenwood District of Tulsa. Plaintiff's sister was badly burned during the Riot. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the

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2 Executive Director of the Oklahoma Historical Society has
3 certified that Plaintiff is a Riot Survivor.

4 150. Plaintiff QUEEN ESTHER LOVE WALKER is an
5 individual residing in the State of Oklahoma. Plaintiff was
6 born on May 4, 1921. At the time of the Riot, Plaintiff lived
7 in the Greenwood District of Tulsa. Plaintiff's family property
8 was destroyed during the Riot, including a house on Greenwood
9 Avenue and a prosperous restaurant. The rioting white mob shot
10 at Plaintiff and her family while they attempted to flee. As
11 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
12 §8205 (West 2000)), the Executive Director of the Oklahoma
13 Historical Society has certified that Plaintiff is a Riot
14 Survivor.

15 151. Plaintiff SAMUEL WALKER is an individual
16 residing in the State of Missouri. Plaintiff was born on
17 September 28, 1921. At the time of the Riot, Plaintiff's
18 mother, who lived on Frankfort Avenue in the Greenwood District
19 of Tulsa, was pregnant with Plaintiff. Plaintiff was born
20 prematurely in a Red Cross tent put up for the Riot survivors.
21 Plaintiff is the brother of Plaintiffs TROY SIDNEY WALKER and
22 JOYCE WALKER HILL. Plaintiff's family property was destroyed
23 during the Riot. As required by the Oklahoma State Legislature
24 (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director
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2 of the Oklahoma Historical Society has certified that Plaintiff
3 is a Riot Survivor.

4 152. Plaintiff TROY SIDNEY WALKER is an individual
5 residing in the State of Washington. Plaintiff was born on
6 August 16, 1918. At the time of the Riot, Plaintiff lived on
7 Frankfort Avenue in the Greenwood District of Tulsa. Plaintiff
8 is brother of JOYCE WALKER HILL and SAMUEL WALKER. Plaintiff's
9 family property was destroyed during the Riot. As required by
10 the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West
11 2000)), the Executive Director of the Oklahoma Historical
12 Society has certified that Plaintiff is a Riot Survivor.

13 153. Plaintiff OSCAR DOUGLAS WASHINGTON is an
14 individual residing in the State of Missouri. Plaintiff was
15 born on February 18, 1912. At the time of the Riot, Plaintiff
16 lived on the 900 Block of Queen Street in the Greenwood District
17 of Tulsa. Plaintiff saw airplanes flying low over Greenwood.
18 Plaintiff fled with his family from the rioting white mob. As
19 required by the Oklahoma State Legislature (74 Okl. Stat. Ann.
20 §8205 (West 2000)), the Executive Director of the Oklahoma
21 Historical Society has certified that Plaintiff is a Riot
22 Survivor.

23 154. Plaintiff MARY LEON BROWN WATSON is an
24 individual residing in the State of Oklahoma. Plaintiff was
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born on October 9, 1909. At the time of the Riot, Plaintiff lived in the Webb Hotel on the corner of Greenwood Avenue and Archer Street in the Greenwood District of Tulsa. Plaintiff's family property was destroyed during the Riot. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

155. Plaintiff ALLEN MATTHEW WHITE is an individual residing in the State of Ohio. Plaintiff was born on February 4, 1917. At the time of the Riot, Plaintiff lived at 1431 N. Lansing Street in the Greenwood District of Tulsa with his family. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

156. Plaintiff CECIL WHITE is an individual residing in the State of California. Plaintiff was born on April 15, 1919. At the time of the Riot, Plaintiff lived at 427 E. Latimer Street in the Greenwood District of Tulsa. During the Riot, the rioting white mob shot and killed Plaintiff's uncle. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma

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Historical Society has certified that Plaintiff is a Riot Survivor.

157. Plaintiff MARIE WHITEHORN is an individual residing in the State of California. Plaintiff was born on April 24, 1910. At the time of the Riot, Plaintiff lived on Greenwood Avenue in the Greenwood District of Tulsa. Plaintiff fled from the rioting white mob during the course of the Riot. Plaintiff suffered emotional trauma as a result of the Riot. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

158. Plaintiff MILDRED EVITT WILBURN is an individual residing in the State of Oklahoma. Plaintiff was born on January 17, 1921. At the time of the Riot, Plaintiff lived in the Greenwood District of Tulsa with her family. As required by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the Executive Director of the Oklahoma Historical Society has certified that Plaintiff is a Riot Survivor.

159. Plaintiff BERTRAM C. WILLIAMS is an individual residing in the State of Washington. Plaintiff was born on September 22, 1920. At the time of the Riot, Plaintiff lived at 543 E. Latimer Court in the Greenwood District of Tulsa.

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2 Plaintiff was unlawfully detained against his will in one of the
3 detention centers. During the Riot, Plaintiff fled from the
4 rioting white mob with his family to Mowhawk Park, where the
5 National Guard captured him and took him to a detention center.
6 As required by the Oklahoma State Legislature (74 Okl. Stat.
7 Ann. §8205 (West 2000)), the Executive Director of the Oklahoma
8 Historical Society has certified that Plaintiff is a Riot
9 Survivor.

10 160. Plaintiff LOUIE BARTON WILLIAMS is an individual
11 residing in the State of Illinois. Plaintiff was born on
12 September 21, 1912. At the time of the Riot, Plaintiff lived in
13 the Greenwood District of Tulsa. Plaintiff was order from her
14 house by the rioting white mob, and fled until she was caught.
15 Plaintiff was unlawfully detained against her will in one of the
16 detention centers. As required by the Oklahoma State
17 Legislature (74 Okl. Stat. Ann. §8205 (West 2000)), the
18 Executive Director of the Oklahoma Historical Society has
19 certified that Plaintiff is a Riot Survivor.

20 161. Plaintiff WILLIAM HAROLD WOOD is an individual
21 residing in the State of Oklahoma. At the time of the Riot,
22 Plaintiff lived in the Greenwood District of Tulsa. As required
23 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
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2 (West 2000)), the Executive Director of the Oklahoma Historical
3 Society has certified that Plaintiff is a Riot Survivor.

4 162. Plaintiff CLOTIE LEWIS WRIGHT is an individual
5 residing in the State of California. At the time of the Riot,
6 Plaintiff lived in the Greenwood District of Tulsa. As required
7 by the Oklahoma State Legislature (74 Okl. Stat. Ann. §8205
8 (West 2000)), the Executive Director of the Oklahoma Historical
9 Society has certified that Plaintiff is a Riot Survivor.

10 163. Plaintiff WESS YOUNG is an individual residing
11 in the State of Oklahoma. Plaintiff was born on February 20,
12 1917. At the time of the Riot, Plaintiff lived on the 300 block
13 of N. Hartford Avenue in the Greenwood District of Tulsa.
14 Plaintiff was captured by the National Guard and unlawfully
15 detained against his will at the Booker T. Washington High
16 School. As required by the Oklahoma State Legislature (74 Okl.
17 Stat. Ann. §8205 (West 2000)), the Executive Director of the
18 Oklahoma Historical Society has certified that Plaintiff is a
19 Riot Survivor.

20 164. Each of the Plaintiffs described above suffered
21 and was directly injured in some way by the unlawful conduct of
22 the Defendants.

23 ii. Descendants
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2 165. Plaintiff DONNA ADAMS is an individual residing
3 in Tulsa, Oklahoma. Plaintiff is a descendant of Thomas and
4 Tacora Adams. At the time of the Riot, Thomas and Tacora Adams
5 lived in Greenwood District of Tulsa.

6 166. Plaintiff JOHNETTA ADAMS is the niece of Roy
7 Alsup. At the time of the Riot, Roy Alsup lived on Madison
8 Street off Lansing in the Greenwood District do of Tulsa with
9 his mother and father and several sisters. When the riot broke
10 out his father left the house with his gun. Roy, his mother and
11 sister fled because of the burning that was happening. They
12 went north along the railroad tracks toward Owasso. As they
13 were fleeing a white woman called them over to her barn, gave
14 them sandwiches and allowed them to stay in the barn until they
15 were rounded up by the National Guard and taken to Carver
16 Stadium. Mr. Alsup reported to his family many times that he
17 saw planes flying over Greenwood dropping bombs.

18 167. Plaintiff THOMAS ADAMS, JR. is a descendant of
19 Thomas and Tacora Adams. At the time of the Riot, Thomas and
20 Tacora Adams lived in Greenwood District of Tulsa.

21 168. Plaintiff C.J. ALEXANDER is the son of C.J.
22 Alexander, Sr. Plaintiff is the brother of Plaintiffs JUANITA
23 ALEXANDER HOPKINS and Lillian Alexander. They are the children
24 of C. J. Alexander, Jr. and the grandchildren of C. J.

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2 Alexander, Sr. At the time of the Riot, C.J. Alexander, Sr. and
3 his family lived on Williams Street in the Greenwood District of
4 Tulsa.

5 169. Plaintiff GEORGE ALEXANDER is an individual
6 residing in Tulsa, Oklahoma. Plaintiff is a descendant of Henry
7 and Ora Tilley. At the time of the Riot, Henry and Ora Tilley
8 lived in Greenwood District of Tulsa.

9 170. Plaintiff LILLIAN ALEXANDER is the daughter of
10 C.J. Alexander, Sr. Plaintiff is the sister of Plaintiffs C. J.
11 ALEXANDER, III and JUANITA ALEXANDER HOPKINS. They are the
12 children of C. J. Alexander, Jr. and the grandchildren of C. J.
13 Alexander, Sr. At the time of the Riot, C.J. Alexander, Sr. and
14 his family lived on Williams Street in the Greenwood District of
15 Tulsa.

16 171. Plaintiff BRENDA NAILS ALFORD is an individual
17 residing in Oklahoma. Plaintiff is the sister of BEVERLY NAILS
18 KELLY and CLARINDA NAILS and a descendant of James Nails. At
19 the time of the Riot, Plaintiff's father was a resident of the
20 Greenwood District.

21 172. Plaintiff BETTY ANDERSON is an individual
22 residing in Edmond, Oklahoma. Plaintiff is the grandchild of
23 Trishie Wright. At the time of the Riot, Trishie Wright lived
24 in the Greenwood District of Tulsa.

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2 173. Plaintiff RHONDA ANDERSON is an individual
3 residing in Tulsa, Oklahoma. Plaintiff is the sister of
4 Plaintiffs MARIETTA ANDERSON WAITERS, DIANNE ANDERSON STEELE,
5 and ROBERT EARL ANDERSON. Plaintiffs are the children of Mary
6 Franklin Anderson. At the time of the Riot, Mary Franklin
7 Anderson lived in the Greenwood District of Tulsa.

8 174. Plaintiff ROBERT EARL ANDERSON is an individual
9 residing in Compton, California. Plaintiff is the brother of
10 Plaintiffs MARIETTA ANDERSON WAITERS, DIANNE ANDERSON STEELE,
11 and RHONDA ANDERSON. Plaintiffs are the children of Mary
12 Franklin Anderson. At the time of the Riot, Mary Franklin
13 Anderson lived in the Greenwood District of Tulsa.

14 175. Plaintiff IRMA THOMAS ANTHONY is an individual
15 residing in Tulsa, Oklahoma. Plaintiff is the sister of
16 Plaintiffs LEONTYNE THOMAS HARRELL and JERRY FIELDS THOMAS. At
17 the time of the Riot, Myrtle Fields Parker lived in the
18 Greenwood District of Tulsa.

19 176. Plaintiff LEONA JERRY BRUNER ANTHONY is an
20 individual residing in Marshall, Texas. Plaintiff is the sister
21 of Plaintiff CLIFTON JOE TIPTON. Plaintiff is the daughter of
22 Corinne Lillian Lucas Tipton Bruner. At the time of the Riot,
23 Corinne Lillian Lucas Tipton Bruner lived at 634 E. Jasper in
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2 the Greenwood District of Tulsa. Her home was damaged when part
3 of it was burned in the Riot.

4 177. Plaintiff MARY BELL ARRINGTON is the child of
5 J.D. and Ida Mae Bell and the grandchild of Isaac (Ike) and
6 Mollie Bell. Plaintiff is the sister of Plaintiffs R.G. BELL
7 and CATHRYN BELL SNODDY. At the time of the Riot, J.D. Bell,
8 Ida Mae Bell, Isaac Bell and Mollie Bell lived in the Greenwood
9 District of Tulsa. Their mother, Ida Mae Bell, was 9 months
10 pregnant at the time of the Tulsa Race Riot. She told them that
11 she had to walk for a long time on June 1, 1921 along the
12 railroad tracks. She saw bodies thrown on the church and trucks
13 carrying bodies to the 15th Street area where she believed they
14 were buried in mass graves. The mother gave birth ten days
15 after the Tulsa Race Riot and had "female trouble" ever since
16 the Tulsa Race Riot. The Bell's owned a family business, Bells'
17 Barbershop on the corner of Greenwood and Archer. Their home
18 was burned down during the riot and the family rebuilt it.

19 178. Plaintiff ARVEN AUTRY is an individual residing
20 in Tulsa, Oklahoma. Plaintiff is a descendant of Rev. James P.
21 and Laura Jeffries Autry. At the time of the Riot, Rev. James
22 Autry was the pastor of Holsey Chapel C.M.E. Church on N. Peoria
23 Avenue in the Greenwood District of Tulsa. Plaintiff's father
24 saw bombs falling from planes over Greenwood. Rev. Autry found
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2 it difficult to return to Tulsa and was deeply emotionally
3 scarred.

4 179. Plaintiff ELMER AUTRY is the child of Rev. James
5 and Laura Jeffries Autry. Plaintiff is the brother RUTH ELLA
6 AUTRY, and JAMES AUTRY. At the time of the Riot, Rev. James
7 Autry was the pastor of Holsey Chapel C.M.E. Church on N. Peoria
8 Avenue in the Greenwood District of Tulsa. Plaintiff's father
9 saw bombs falling from planes over Greenwood. Rev. Autry found
10 it difficult to return to Tulsa and was deeply emotionally
11 scarred.

12 180. Plaintiff JAMES AUTRY is the child of Rev. James
13 and Laura Jeffries Autry. Plaintiff is the brother of
14 Plaintiffs RUTH ELLA AUTRY, and ELMER AUTRY. At the time of the
15 Riot, Rev. James Autry was the pastor of Holsey Chapel C.M.E.
16 Church on N. Peoria Avenue in the Greenwood District of Tulsa.
17 Plaintiff's father saw bombs falling from planes over Greenwood.
18 Rev. Autry found it difficult to return to Tulsa and was deeply
19 emotionally scarred.

20 181. Plaintiff OTIS AUTREY, JR. is an individual
21 residing in Texas. Plaintiff is a descendant of Otis Autrey,
22 the deceased descendant of Riot survivors Reverend James P. and
23 Laura Jefferies Autrey. At the time of the Riot, Rev. James
24 Autrey was the pastor of Holsey Chapel C.M.E. Church on North
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2 Peoria Avenue in the Greenwood District of Tulsa. Plaintiff's
3 grandfather saw bombs falling from planes over Greenwood. Rev.
4 Autrey found it difficult to return to Tulsa and was deeply
5 emotionally scarred.

6 182. Plaintiff RUTH ELLA AUTRY is the child of Rev.
7 James and Laura Jeffries Autry. Plaintiff is the sister of
8 Plaintiffs JAMES AUTRY, and ELMER AUTRY. At the time of the
9 Riot, Rev. James Autry was the pastor of Holsey Chapel C.M.E.
10 Church on N. Peoria Avenue in the Greenwood District of Tulsa.
11 Plaintiff's father saw bombs falling from planes over Greenwood.
12 Rev. Autry found it difficult to return to Tulsa and was deeply
13 emotionally scarred.

14 183. Plaintiff MARGUERITE BAGBY is an individual
15 residing in Tulsa, Oklahoma. Plaintiff is the daughter of Anna
16 Tolbert. At the time of the Riot, Anna Tolbert lived in the
17 Greenwood District of Tulsa.

18 184. Plaintiff JOHN BAILEY is the great nephew of
19 David Bailey. At the time of the Riot, David Bailey lived in
20 the Greenwood District of Tulsa.

21 185. Plaintiff NICHOLAS A. BANKS is an individual
22 residing in Vancouver, Washington. Plaintiff is the brother of
23 Plaintiffs BERNICE E. DAVIS and AUDREY BANKS PARSON. Plaintiffs
24 are the children of Nick Banks. At the time of the Riot, Nick
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2 Banks owned a pool hall, and worked as a chef at the Ketchum
3 Hotel in the Greenwood District of Tulsa.

4 186. Plaintiff EDITH MCALESTER BARNES is an
5 individual residing in Oklahoma. Plaintiff is the sister of
6 Plaintiff EARTHA MCALESTER NORMAN and a descendant of Clarence
7 and Margie King. At the time of the Riot, Plaintiffs great-aunt
8 and uncle resided in the Greenwood District.

9 187. Plaintiff LESLIE BEARD is the child of Ruth
10 Fowler Martin and the grandchild of Richard and Viola Fowler
11 (Huggins). Plaintiff is the sister of Plaintiffs DOROTHY JONES,
12 NANCY MARTIN, CATHERINE MARTIN, JAMES PRESTON MARTIN, and FELTON
13 MARTIN. At the time of the Riot, Ruth Fowler Martin, Richard
14 Fowler, and Viola Fowler lived in the Greenwood District of
15 Tulsa. Plaintiff's mother fled with her husband, Richard
16 Fowler, with her child, Ruth Fowler, from the rioting white mob.
17 The rioting white mob burned down their home and destroyed all
18 their property.

19 188. Plaintiff RAYMOND BEARD, SR. is an individual
20 residing in Tulsa, Oklahoma. At the time of the Riot,
21 Plaintiff's sister, Mary Beard, lived in the Greenwood District
22 of Tulsa.

23 189. Plaintiff AUDELE MCLEOD BEEKS is an individual
24 residing in St. Louis, Missouri. Plaintiff is the sister of
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2 Plaintiffs FELICIA MCLEOD JOHNSON, PATRICIA MCLEOD STEPHENSON,
3 and WALLACE MCLEOD. Plaintiffs are the sons and daughters of
4 Wallace McLeod, Sr. and Bessie Audele Beatty McLeod. At the
5 time of the Riot, Wallace McLeod, Sr. and Bessie Audele Beatty
6 McLeod lived at 301 N. Elgin in the Greenwood District of Tulsa.
7 The rioting white mob burned their home to the ground.
8 Plaintiff's father was unlawfully detained against his will at
9 the Convention Center detention center.

10 190. Plaintiff R.G. BELL is the child of J.D. and Ida
11 Mae Bell and the grandchild of Isaac (Ike) and Mollie Bell.
12 Plaintiff is the brother of Plaintiffs MARY BELL ARRINGTON, and
13 CATHRYN BELL SNODDY. At the time of the Riot, J.D. Bell, Ida
14 Mae Bell, Isaac Bell and Mollie Bell lived in the Greenwood
15 District of Tulsa. Their mother, Ida Mae Bell, was 9 months
16 pregnant at the time of the Tulsa Race Riot. She told them that
17 she had to walk for a long time on June 1, 1921 along the
18 railroad tracks. She saw bodies thrown on the church and trucks
19 carrying bodies to the 15th Street area where she believed they
20 were buried in mass graves. The mother gave birth ten days
21 after the Tulsa Race Riot and had "female trouble" ever since
22 the Tulsa Race Riot. The Bell's owned a family business, Bells'
23 Barbershop on the corner of Greenwood and Archer. Their home
24 was burned down during the riot and the family rebuilt it.
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2 191. Plaintiff WILMA PRESLEY BELL is the descendant
3 of John Smith Presley and Josephine Davis Presley, and the
4 grandson of Lucinda Davis. At the time of the Riot, Plaintiff's
5 family owned a home on N. Greenwood in the Greenwood District of
6 Tulsa. Plaintiff's grandmother, Lucinda Davis, who was a member
7 of the Creek Nation, owned a home near Kyle's Drugstore. Her
8 home and all of its contents were destroyed.

9 192. Plaintiff SIMON BERRY JR. is an individual
10 residing in Los Angeles, California. Plaintiff is the son of
11 Simon Berry Sr. At the time of the Riot, Simon Berry Sr., lived
12 in the Greenwood District of Tulsa.

13 193. Plaintiff REV. BRADFORD BISHOP is an individual
14 residing in Tulsa, Oklahoma. Plaintiff is the brother of
15 Plaintiffs LISA LATIMER, PATRICE LATIMER, JAYPHEE LATIMER,
16 CAESAR LATIMER, JAMES HAROLD LATIMER, CHARLES SYLVESTER LATIMER,
17 and JULIUS PEGUES. Plaintiffs are the children of James Harold
18 and Julia Latimer, who resided in the Greenwood District of
19 Tulsa at the time of the Riot.

20 194. Plaintiff EUGENE BOLTON is an individual
21 residing in Tulsa, Oklahoma. Plaintiff is a descendant of
22 Fletcher Daniels. At the time of the Riot, Fletcher Daniels
23 lived in Greenwood District of Tulsa.

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2 195. Plaintiff JAMES BOLTON is an individual residing
3 in Altadena, California. Plaintiff is a descendant of Fletcher
4 Daniels. At the time of the Riot, Fletcher Daniels lived in
5 Greenwood District of Tulsa.

6 196. Plaintiff OSCAR BOYD is the grandchild of Mr.
7 and Mrs. Willie Staples and the children of Gertrude Staples.
8 At the time of the Tulsa Race Riot, their mother was 19 years
9 old and lived with their grandparents in the Greenwood District
10 of Tulsa. The rioting white mob burned their home to the
11 ground.

12 197. Plaintiff DOROTHY WILLIAMS BRANLETT is an
13 individual residing in Tulsa, Oklahoma. Plaintiff is the
14 grandchild of Fisher James Williams and Dinah Freeman Williams.
15 At the time of the Riot, Fisher James Williams lived in the
16 Greenwood District of Tulsa, and was injured during the Riot.
17 Plaintiff's father died as a result of his injuries at St.
18 John's Hospital on June 21, 1921.

19 198. Plaintiff DOROTHY JACKSON BREWER is a descendant
20 of Henry and Ora Tilley. At the time of the Riot, Henry and Ora
21 Tilley lived in Greenwood District of Tulsa.

22 199. Plaintiff PATRICIA DUKES BROME is an individual
23 residing in Louisiana. Plaintiff is the sister of MILDRED
24 WALLACE HUDSPETH, ROBERT CHARLES DUKES, SYLVIA WARE and WILLIE
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2 DUKES and a descendant of Robert and Mildred Wallace. At the
3 time of the Riot, Plaintiff's parents resided in the Greenwood
4 District and lost their home including all their savings.

5 200. Plaintiff NAOMI LAWSON BROWN is an individual
6 residing in Colorado Springs, Colorado. Plaintiff is the sister
7 of Plaintiffs EDWARD LAWSON, WILBUR FOSTER, and RONALD EARL
8 MOORE. Plaintiffs are the sons and daughters of Naomi Foster
9 Moore and the grandson of Mattie Pearl Calhoun. At the time of
10 the Riot, Naomi Foster Moore and Mattie Pearl Calhoun lived in
11 the Greenwood District of Tulsa.

12 201. Plaintiff WILLIAM BRUNER is an individual
13 residing in California. Plaintiff is the descendant of Mary
14 Jones Parrish. At the time of the Riot, Plaintiff's mother was
15 a resident of the Greenwood District.

16 202. Plaintiff BRENDA FAIR CAMPBELL is an individual
17 residing in Tulsa, Oklahoma. She is the sister of JANET FAIR,
18 STANLEY FAIR, JR., JANE FAIR PRUETT, GERALDINE FAIR JESSIE, and
19 YVONNE FAIR SHAW. Plaintiffs are the children of Stanley Fair,
20 Sr., who resided in the Greenwood District of Tulsa at the time
21 of the Riot.

22 203. Plaintiff HENRY CANNON is an individual residing
23 in Tulsa, Oklahoma. Plaintiff is the brother of Plaintiffs
24 JOHNNYE CANNON LAWSON, NATHANIEL CANNON, and MILDRED CANNON
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WALLACE. Plaintiffs are the sons and daughters Johnnye M. Mitchell Cannon and grandchildren of Charles and Jessie Mitchell. At the time of the Riot, Johnnye M. Mitchell Cannon, Charles Cannon, and Jessie Mitchell lived in the Greenwood District of Tulsa. Plaintiffs' mother and grandparents were forced to flee Greenwood in order save their lives. Plaintiffs' parents and grandparent's home was burned to the ground.

204. Plaintiff NATHANIEL CANNON is an individual residing in Muskogee, Oklahoma. Plaintiff is the brother of Plaintiffs JOHNNYE CANNON LAWSON, HENRY CANNON, and CANNON

WALLACE. Plaintiffs are the sons and daughters Johnnye M. Mitchell Cannon and grandchildren of Charles and Jessie Mitchell. At the time of the Riot, Johnnye M. Mitchell Cannon, Charles Cannon, and Jessie Mitchell lived in the Greenwood District of Tulsa. Plaintiffs' mother and grandparents were forced to flee Greenwood in order save their lives. Plaintiffs' parents and grandparent's home was burned to the ground.

205. Plaintiff EDWINA WALKER CARR is an individual residing in Las Angeles, California. Plaintiff is a descendant of Raphael Walker. At the time of the Riot, Raphael Walker lived in the Greenwood District of Tulsa.

206. Plaintiff BERNARD CARTER is an individual residing in Compton, California. Plaintiff is a descendant of

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Robert Carter. At the time of the Riot, Robert Carter lived in the Greenwood District of Tulsa.

207. Plaintiff EDDIE HUE CARTER is an individual residing in Compton, California. Plaintiff is a descendant of Robert Carter. At the time of the Riot, Robert Carter lived in the Greenwood District of Tulsa.

208. Plaintiff ROBERT CARTER, JR, is an individual residing in Bakersfield, California. Plaintiff is a descendant of Robert Carter. At the time of the Riot, Robert Carter lived in the Greenwood District of Tulsa.

209. Plaintiff SAMUEL LEE CARTER is an individual residing in Bakersfield, California. Plaintiff is a descendant of Robert Carter. At the time of the Riot, Robert Carter lived in the Greenwood District of Tulsa.

210. Plaintiff ELIZABETH COOLEY CHAPPELLE is the widow of Rev. T. Oscar Chappelle. At the time of the Riot, Rev. T. Oscar Chappelle lived in Greenwood District of Tulsa.

211. Plaintiff ANITA WILLIAMS CHRISTOPHER is the daughter of William D. and Lula Williams and granddaughter of John Wesley Williams. At the time of the Riot, William D. Williams, Lula Williams, and John Wesley Williams all resided at Greenwood and Archer in the Greenwood District of Tulsa. They

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2 owned the Dreamland Theatre that was burned down and their home
3 was burned down.

4 212. Plaintiff VASSIE CLARK is an individual residing
5 in Tulsa, Oklahoma. He is the brother of VAL GENE JOHNSON, SR.,
6 MARY L. EMERSON, and BOBBIE WILSON. Plaintiffs are the children
7 of Robert Franklin Johnson, who resided in the Greenwood
8 District of Tulsa at the time of the Riot.

9 213. Plaintiff AILEEN JOANNE AUSTIN COBURN is the
10 daughter of Simon and Senora Austin. Plaintiff is the sister of
11 LEONA AUSTIN McCAIN. At the time of the Riot, Simon and Senora
12 Austin lived in the Greenwood district of Tulsa.

13 214. Plaintiff MARILYN KAY JOHNSON COLEY is an
14 individual residing in Plumerville, Arkansas. She is the sister
15 of SHIRLEY A. JOHNSON TYUS, JANICE LOU JOHNSON ROSS, LENA MAE
16 JOHNSON PAYNE, and RONALD WAYNE JOHNSON. Plaintiffs are the
17 children of Bennie Lee Johnson, who resided in the Greenwood
18 District of Tulsa at the time of the Riot.

19 215. Plaintiff ERLINE CROSSLIN is the child of Fannie
20 Mae Bagby. Plaintiff is the sister of BILLIE WAYNE RUCKER, J.
21 C. RUCKER, ROBERT C. RUCKER and ROSEZELLA TURNER. At the time
22 of the Riot, Fannie Mae Bagby lived in Greenwood District of
23 Tulsa.

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216. Plaintiff BERNICE E. BANKS DAVIS is the child of Nick Banks. Plaintiff is the sister of Plaintiffs NICHOLAS A. BANKS and AUDREY BANKS PARSON. At the time of the Riot, Nick Banks owned a pool hall and was a chef at the Ketchum Hotel in the Greenwood District of Tulsa.

217. Plaintiff FRED DAVIS is an individual residing in Tulsa, Oklahoma. Plaintiff is the brother of Plaintiffs MILDRED LOUISE DAVIS SCOTT, THERESA DAVIS SCOTT, and SANDRA JEAN DAVIS LANDRUM is an individual residing in Tulsa, Oklahoma. Plaintiffs are the surviving children of Thomas R. Davis and Rosa Davis. At the time of the Riot, Thomas R. Davis and Rosa Davis lived in the Greenwood District of Tulsa.

218. Plaintiff ROY DAVIS is the son of Peter Bailey. At the time of the Riot, Peter Bailey owned a business in Greenwood, located at Pine and Greenwood.

219. Plaintiff LAWRENCE HERMAN DENNIE is the grandchild of Howard and Ida Rodgers. At the time of the Riot, Howard and Ida Rodgers lived in the 100 or 200 block of Hartford Street in the Greenwood District of Tulsa. Plaintiff's parents' home was seriously damaged during the Tulsa Race Riot. Their uncle, George Dennie, Jr. was injured during the Tulsa Race Riot and hospitalized.

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2 220. Plaintiff EVELYN DIGGS is an individual residing
3 in California. Plaintiff is the sister of Plaintiff SAYYID JAMI
4 and descendant of Ernest and Gladys Crooms, the deceased
5 descendants of Riot Survivor Mary Horn, Tulsa's first African-
6 American policewoman. At the time of the Riot, Mary Horn lived
7 on Archer Avenue in the area known as "The Hill." Plaintiff's
8 grandmother's home was burned to the ground and all personal
9 possessions were destroyed.

10 221. Plaintiff ROBERT CHARLES DUKES is an individual
11 residing in Louisiana. Plaintiff is the brother of MILDRED
12 WALLACE HUDSPETH, PATRICIA DUKES BROME, SYLVIA WARE and WILLIE
13 DUKES and a descendant of Robert and Mildred Wallace. At the
14 time of the Riot, Plaintiff's parents resided in the Greenwood
15 District and lost their home including all their savings.

16 222. Plaintiff WILLIE DUKES is an individual residing
17 in California. Plaintiff is the sister of MILDRED WALLACE
18 HUDSPETH, PATRICIA DUKES BROME, ROBERT CHARLES DUKES and SYLVIA
19 WARE and a descendant of Robert and Mildred Wallace. At the
20 time of the Riot, Plaintiff's parents resided in the Greenwood
21 District and lost their home including all their savings.

22 223. Plaintiff RITA DUNCAN is an individual residing
23 in Tulsa, Oklahoma. Plaintiff is a descendant of James L. and
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2 Carrie Duncan. At the time of the Riot, James L. and Carrie
3 Duncan lived in Greenwood District of Tulsa.

4 224. Plaintiff ROGER DUNCAN is an individual residing
5 in San Diego, California. Plaintiff is a descendant of James L.
6 and Carrie Duncan. At the time of the Riot, James L. and Carrie
7 Duncan lived in Greenwood District of Tulsa.

8 225. Plaintiff SYLVIA A. DUNN is an individual
9 residing in the State of California. Plaintiff is the daughter
10 of Hattie Lillie Dunn, who, at the time of the Riot, lived on
11 Elgin Street in the Greenwood District of Tulsa. Plaintiff's
12 family property and home were destroyed during the Riot.

13 226. Plaintiff AMY GAMBLE EIDSON is an individual
14 residing in Tulsa, Oklahoma. She is the sister of EVA GAMBLE
15 MORRIS. Plaintiffs are the children of Harry Gamble, Jr., who
16 resided in the Greenwood District of Tulsa at the time of the
17 Riot.

18 227. Plaintiff MARY L. EMERSON is an individual
19 residing in Tulsa, Oklahoma. She is the sister of VAL GENE
20 JOHNSON, SR., BOBBIE WILSON, and VASSIE CLARK. Plaintiffs are
21 the children of Robert Franklin Johnson, who resided in the
22 Greenwood District of Tulsa at the time of the Riot.

23 228. Plaintiff BILL EWING is an individual residing
24 in Louisville, Colorado. Plaintiff is the brother of Plaintiffs
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2 JO ANN EWING, WANDA EWING POPE, and ROBERT EWING. Plaintiffs
3 are the children of Eva Small. At the time of the Riot, Eva
4 Small lived in the Greenwood District of Tulsa.

5 229. Plaintiff JO ANN EWING is an individual residing
6 in Aurora, Colorado. Plaintiff is the sister of Plaintiffs
7 WANDA EWING POPE, ROBERT EWING, and BILL EWING. Plaintiffs are
8 the children of Eva Small. At the time of the Riot, Eva Small
9 lived in the Greenwood District of Tulsa.

10 230. Plaintiff ROBERT EWING is an individual residing
11 in Oakland, California. Plaintiff is the brother of Plaintiffs
12 JO ANN EWING, WANDA EWING POPE, and BILL EWING is an individual
13 residing in Louisville, Colorado. Plaintiffs are the children
14 of Eva Small. At the time of the Riot, Eva Small lived in the
15 Greenwood District of Tulsa.

16 231. Plaintiff JANET FAIR is the sister of JANE FAIR
17 PRUETT, BRENDA FAIR CAMPBELL, STANLEY FAIR, JR., GERALDINE FAIR
18 JESSIE, and YVONNE FAIR SHAW. Plaintiffs are the children of
19 Stanley Fair, Sr., who resided in the Greenwood District of
20 Tulsa at the time of the Riot.

21 232. Plaintiff STANLEY FAIR, JR., is an individual
22 residing in Tulsa, Oklahoma. He is the brother of JANET FAIR,
23 JANE FAIR PRUETT, BRENDA FAIR CAMPBELL, GERALDINE FAIR JESSIE,
24 and YVONNE FAIR SHAW. Plaintiffs are the children of Stanley
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2 Fair, Sr., who resided in the Greenwood District of Tulsa at the
3 time of the Riot.

4 233. Plaintiff WILBUR FOSTER is an individual
5 residing in Los Angeles, California. Plaintiff is the brother
6 of Plaintiffs NAOMI LAWSON BROWN, EDWARD LAWSON, and RONALD EARL
7 MOORE. Plaintiffs are the sons and daughters of Naomi Foster
8 Moore and the grandson of Mattie Pearl Calhoun. At the time of
9 the Riot, Naomi Foster Moore and Mattie Pearl Calhoun lived in
10 the Greenwood District of Tulsa.

11 234. Plaintiff ALFREDA O. DENNIE FRANKLIN is the
12 grandchild of Howard and Ida Rodgers. At the time of the Riot,
13 Howard and Ida Rodgers lived in the 100 or 200 block of
14 Hartford Street in the Greenwood District of Tulsa. Plaintiff's
15 parents' home was seriously damaged during the Tulsa Race Riot.
16 Their uncle, George Dennie, Jr. was injured during the Tulsa
17 Race Riot and hospitalized.

18 235. Plaintiff JOHN HOPE FRANKLIN is the son of B.C.
19 Franklin. At the time of the Riot, Plaintiff's father was an
20 attorney in the Greenwood District of Tulsa during the Riot.
21 Plaintiff's home and office burned to the ground and he worked
22 out of a tent for several months. Plaintiff's father was also
23 detained and taken to the Convention Hall detention center
24 during the Riot.

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2 236. Plaintiff JEAN FREENY is an individual residing
3 in California. Plaintiff is a descendant of Ernest and Gladys
4 Crooms, the deceased descendants of Riot Survivor Mary Horn,
5 Tulsa's first African-American policewoman. At the time of the
6 Riot, Mary Horn lived on Archer Avenue in the area known as "The
7 Hill." Plaintiff's grandmother's home was burned to the ground
8 and all personal possessions were destroyed.

9 237. Plaintiff THELMA KINLAW GERMANY is the daughter
10 of Evans and Caldonia Collins Kinlaw. At the time of the Riot,
11 Evans and Caldonia Collins Kinlaw rented a home in Greenwood
12 District of Tulsa. During the Riot the home was burned and they
13 lost all their personal property.

14 238. Plaintiff MARGARET JEAN TILLEY GIBBS is an
15 individual residing in Oklahoma. Plaintiff is the sister of
16 DOROTHY JACKSON BREWER AND ANNIE ALEXANDER WILSON and a
17 descendant of Henry and Ora Tilley. At the time of the Riot,
18 Plaintiff's parent resided in the Greenwood District.

19 239. Plaintiff BOBBYE LOUISE GILBERT is an individual
20 residing in Midland, Texas. Plaintiff is the sister of
21 Plaintiff FANNIE WILLIAMS. Plaintiffs are children of Joseph
22 and Mamie Henderson. At the time of the Riot, Joseph Henderson
23 and Mamie Henderson lived in the Greenwood District of Tulsa.

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240. Plaintiff JEANNE OSBY GOODWIN is the widow of E. L. Goodwin. At the time of the Riot, E. L. Goodwin lived in Greenwood District of Tulsa.

241. Plaintiff LINDA EDMONDSON GRAVES is an individual residing in Tulsa, Oklahoma. Plaintiff is the daughter of Luther Edmondson. At the time of the Riot, Luther Edmondson lived in the Greenwood District of Tulsa. Plaintiff's father damaged his knees while swimming across the Arkansas River to escape the white mob and fled to Sapulpa, west of Tulsa.

242. Plaintiff ALBERT GRAYSON is the son of Willie and Doris Grayson. At the time of the Riot, Willie and Doris Grayson lived in Greenwood District of Tulsa.

243. Plaintiff KATHERINE WOOD HALE is an individual residing in Minnesota. Plaintiff is the descendant of George and Florence Wood. At the time of the Riot, Plaintiff's parents owned a home and a restaurant in the Greenwood District. Both properties were destroyed and Plaintiff's parents moved to Coffeyville, Kansas after the Riot.

244. Plaintiff LEONTYNE THOMAS HARRELL is an individual residing in Oakland California. Plaintiff is the sister of Plaintiffs IRMA THOMAS ANTHONY and JERRY FIELDS THOMAS. Plaintiffs are the children of Myrtle Fields Parker.

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At the time of the Riot, Myrtle Fields Parker lived in the Greenwood District of Tulsa.

245. Plaintiff DELORES HARRINGTON is an individual residing in St. Louis, Missouri. Plaintiff is the sister of Plaintiff SHIRLEY RIDLEY. Plaintiffs are the daughters of Marion Spears. At the time of the Riot, Marion Spears lived in the Greenwood District of Tulsa.

246. Plaintiff MARY PRISCILLA PARKER HARRISON is the daughter of Ellen Ursuline Richards Tillman. Plaintiff is the sister of and GENIEIVE JACKSON. At the time of the Riot, Ellen Ursuline Richards Tillman lived in the Greenwood District of Tulsa.

247. Plaintiff JEANETTE HAWKINS is an individual residing in Chicago, Illinois. Plaintiff is a descendant of Clarence Hawkins, Jr. At the time of the Riot, Clarence Hawkins, Jr., lived in the Greenwood District of Tulsa.

248. Plaintiff OLANDER HAWKINS is an individual residing in Chicago, Illinois. PLAINTIFF is a descendant of Lula Hawkins. At the time of the Riot, Lula Hawkins lived in the Greenwood District of Tulsa.

249. Plaintiff STARLA HAWKINS is an individual residing in Denver, Colorado. Plaintiff is a descendant of

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Berzell Williams Hawkins. At the time of the Riot, Berzell Williams Hawkins lived in the Greenwood District of Tulsa.

250. Plaintiff JOBIE ELIZABETH HOLDERNESS is the widow of Lynn Holderness. At the time of the Riot, Lynn Holderness lived in Greenwood District of Tulsa.

251. Plaintiff MAYBELLINE PRESLEY HOOKS is the descendant of John Smith Presley and Josephine Davis Presley, and the grandson of Lucinda Davis. At the time of the Riot, Plaintiff's family owned a home on N. Greenwood in the Greenwood District of Tulsa. Plaintiff's grandmother, Lucinda Davis, who was a member of the Creek Nation, owned a home near Kyle's Drugstore. Her home and all of its contents were destroyed.

252. Plaintiff JUANITA ALEXANDER HOPKINS is the daughter of C.J. Alexander, Sr. Plaintiff is the sister of Plaintiffs C. J. ALEXANDER, III and LILLIAN ALEXANDER. They are the children of C. J. Alexander, Jr. and the grandchildren of C. J. Alexander, Sr. At the time of the Riot, C.J. Alexander, Sr. and his family lived on Williams Street in the Greenwood District of Tulsa.

253. Plaintiff SHARON HOPKINS is an individual residing in Oklahoma. Plaintiff is a descendant of Otis Autrey, the deceased descendant of Riot survivors Rev. James P. and Laura Jefferies Autrey. At the time of the Riot, Rev. James

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2 Autrey was the pastor of Holsey Chapel C.M.E. Church on North
3 Pretoria Avenue in the Greenwood District of Tulsa. Plaintiff's
4 grandfather saw bombs falling from planes over Greenwood. Rev.
5 Autrey found it difficult to return to Tulsa and was deeply
6 emotionally scarred.

7 254. Plaintiff EMMA LOCKARD HORN is an individual
8 residing in Muskogee, Oklahoma. Plaintiff is the sister of
9 Plaintiffs SELMA LOCKARD, FRANK LOCKARD, JESSIE MAE LOCKARD,
10 EDWARD LOCKARD, ERNEST LOCKARD, OSCAR LOCKARD, and CORTEZ
11 LOCKARD. Plaintiffs are children of Joe Lockard and Rina
12 Hawkins-Lockard. At the time of the Riot, Joe Lockard and Rina
13 Hawkins-Lockard lived in the Greenwood District of Tulsa.

14 255. Plaintiff MAXIMILLIAN HOWELL is an individual
15 residing in Topeka, Kansas. He is the son of Johnson Howell,
16 who resided in the Greenwood District of Tulsa at the time of
17 the Riot.

18 256. Plaintiff MILDRED WALLACE HUDSPETH is an
19 individual residing in California. Plaintiff is the sister of
20 PATRICIA DUKES BROME, ROBERT CHARLES DUKES, SYLVIA WARE and
21 WILLIE DUKES and a descendant of Robert and Mildred Wallace. At
22 the time of the Riot, Plaintiff's parents resided in the
23 Greenwood District and lost their home including all their
24 savings.

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2 257. Plaintiff HELEN SIPUEL HUGGINS is the daughter
3 of Rev. Travis B. and Martha Bell Smith Sipuel. At the time of
4 the Riot, Rev. Travis B. and Martha Bell Smith Sipuel lived in
5 the Greenwood District of Tulsa. The rioting white mob burned
6 Plaintiff's parent's home to the ground and all their personal
7 property lost. Her father, who was a dark skinned African
8 American, was taken by the militia to McNulty Park. Her mother
9 was very light in complexion and was standing in front of the
10 home watching it burn. A militia officer saw her mother
11 standing there and asked: "Lady, what are you doing here?" and
12 the mother could not respond so he said "Well, you'd better get
13 yourself back to the white part of town before the niggers get
14 ahold of you." Shortly thereafter her parents moved to
15 Chicksaw, Oklahoma.

16 258. Plaintiff CLARENCE JACKSON is an individual
17 residing in Tulsa, Oklahoma. Plaintiff is a descendant of Henry
18 and Ora Tilley. At the time of the Riot, Henry and Ora Tilley
19 lived in Greenwood District of Tulsa.

20 259. Plaintiff DELLA SHELTON JACKSON an individual
21 residing in Oklahoma City, Oklahoma. Plaintiff is the
22 grandchild of Trishie Wright. At the time of the Riot, Trishie
23 Wright lived in the Greenwood District of Tulsa.
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2 260. Plaintiff GAIL JACKSON is an individual residing
3 in Oklahoma. Plaintiff is a descendant of Henry Knox, John
4 Edward Knox. At the time of the Riot, the Plaintiff's
5 grandfather and father fled the rioting white mob and were
6 later held in detention.

7 261. Plaintiff GENIEIVE JACKSON is the daughter of
8 Ellen Ursuline Richards Tillman. Plaintiff is the sister of
9 Plaintiff MARY PRISCILLA PARKER HARRISON. At the time of the
10 Riot, Ellen Ursuline Richards Tillman lived in the Greenwood
11 District of Tulsa.

12 262. Plaintiff ROSIE LEE JACKSON is an individual
13 residing in Tulsa, Oklahoma. Plaintiff is the sister of
14 Plaintiffs FRED SMITH, FANIE SMITH VERNER, and ERMA SMITH
15 THOMPSON. Plaintiffs are the children of Willis and Maggie
16 Smith. At the time of the Riot, Willis and Maggie Smith lived
17 in the Greenwood District of Tulsa.

18 263. Plaintiff SAYYID JAMI is an individual residing
19 in California. Plaintiff is a descendant of Ernest and Gladys
20 Crooms, the deceased descendants of Riot survivor Mary Horn,
21 Tulsa's first African American policewoman. At the time of the
22 Riot, Mary Horn lived on Archer Avenue in the area known as "The
23 Hill." Plaintiff's grandmother's home was burned to the ground
24 and all personal possessions were destroyed.

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2 264. Plaintiff ARTHUR JEFFERSON is the grandchild of
3 Johnny Adams, children of Eliza Adams and nephew and niece of
4 "Saucer" Grayson. At the time of the Riot, Plaintiffs and
5 Plaintiffs mother lived on Jasper Street. Plaintiff's family
6 also owned six or seven rent houses on Jasper Street just off
7 Greenwood Avenue. Everything they owned was burned down by the
8 white mob. The family hid in an old shed behind their homes
9 near an alley and watched through cracks as the white mob set
10 fire to their property. The white mob was heavily armed,
11 shooting everywhere and their uncle, "Saucer" Grayson was shot
12 and killed.

13 265. Plaintiff LULA MAE JEFFERSON is an individual
14 residing in Kansas. Plaintiff is the sister of MARTHA MCGLORIE
15 SWINDALL, MATTHEW JEFFERSON, ROBERT JEFFERSON, VERNELL KELLEY
16 and MARGE WALLACE and the descendant of the Reverend A.L. and
17 Lucinda McGlorie who resided in the Greenwood District at the
18 time of the Riot.

19 266. Plaintiff MATTHEW JEFFERSON is an individual
20 residing in Kansas. Plaintiff is the brother of LULA MAE
21 JEFFERSON, ROBERT JEFFERSON, VERNELL KELLEY, MARTHA MCGLORIE
22 SWINDALL and MARGE WALLACE and the descendant of the Reverend
23 A.L. and Lucinda McGlorie who resided in the Greenwood District
24 at the time of the Riot.

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2 267. Plaintiff ROBERT JEFFERSON is an individual
3 residing in Kansas. Plaintiff is the brother of MARTHA MCGLORIE
4 SWINDALL, LULA MAE JEFFERSON, MATTHEW JEFFERSON, VERNELL KELLEY
5 and MARGE WALLACE and the descendant of the Reverend A.L. and
6 Lucinda McGlorie who resided in the Greenwood District at the
7 time of the Riot.

8 268. Plaintiff GERALDINE FAIR JESSIE is an individual
9 residing in Tulsa, Oklahoma. She is the sister of JANET FAIR,
10 STANLEY FAIR, JR., JANE FAIR PRUETT, BRENDA FAIR CAMPBELL, and
11 YVONNE FAIR SHAW. Plaintiffs are the children of Stanley Fair,
12 Sr., who resided in the Greenwood District of Tulsa at the time
13 of the Riot.

14 269. Plaintiff CAROLYN PRICE JOHNSON is an individual
15 residing in Plano, Texas. Plaintiff is the sister of Plaintiff
16 FLOYD PRICE. Plaintiffs are the children of Ruth Fairchild
17 Price. At the time of the Riot, Ruth Fairchild Price lived in
18 the Greenwood District of Tulsa.

19 270. Plaintiff FELICIA MCLEOD JOHNSON is an
20 individual residing in Los Angeles, California. Plaintiff is the
21 sister of Plaintiffs AUDELE MCLEOD BEEKS, PATRICIA MCLEOD
22 STEPHENSON, and WALLACE MCLEOD, JR. is in individual residing in
23 Tulsa. Plaintiffs are the sons and daughters of Wallace McLeod,
24 Sr. and Bessie Audele Beatty McLeod. At the time of the Riot,
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2 Wallace McLeod, Sr. and Bessie Audele Beatty McLeod lived at 301
3 N. Elgin in the Greenwood District of Tulsa. The rioting white
4 mob burned their home to the ground. Plaintiff's father was
5 unlawfully detained against his will at the Convention Center
6 detention center.

7 271. Plaintiff JOANN JOHNSON is individual residing
8 in California. Plaintiff is a descendant of the Reverend
9 William Harrison Woods, Jr. At the time of the Riot, Plaintiff
10 father lived in the Greenwood District.

11 272. Plaintiff RONALD WAYNE JOHNSON is an individual
12 residing in Plumerville, Arkansas. He is the brother of SHIRLEY
13 A. JOHNSON TYUS, JANICE LOU JOHNSON ROSS, MARILYN KAY JOHNSON
14 COLEY, and LENA MAE JOHNSON PAYNE. Plaintiffs are the children
15 of Bennie Lee Johnson, who resided in the Greenwood District of
16 Tulsa at the time of the Riot.

17 273. Plaintiff VAL GENE JOHNSON, SR. is an individual
18 residing in Tulsa, Oklahoma. He is the brother of MARY L.
19 EMERSON, BOBBIE WILSON, and VASSIE CLARK. Plaintiffs are the
20 children of Robert Franklin Johnson, who resided in the
21 Greenwood District of Tulsa at the time of the Riot.

22 274. Plaintiff DOROTHY JONES is the child of Ruth
23 Fowler Martin and the grandchild of Richard and Viola Fowler
24 (Huggins). Plaintiff is the sister of, NANCY MARTIN, CATHERINE
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MARTIN, JAMES PRESTON MARTIN, FELTON MARTIN, LESLIE BEARD. At the time of the Riot, Ruth Fowler Martin, Richard Fowler, and Viola Fowler lived in the Greenwood District of Tulsa.

Plaintiff's mother fled with her husband, Richard Fowler, with her child, Ruth Fowler, from the rioting white mob. The rioting white mob burned down their home and destroyed all their property.

275. Plaintiff EVA MAE TILLEY JONES is an individual residing in Tulsa, Oklahoma. Plaintiff is a descendant of Henry and Ora Tilley. At the time of the Riot, Henry and Ora Tilley lived in Greenwood District of Tulsa.

276. Plaintiff MELVIN "TIP" JONES is an individual residing in Beggs, Oklahoma. He is the son of plaintiffs LEE AND STELLA JONES, who resided in the Greenwood District of Tulsa at the time of the Riot.

277. Plaintiff MILDREN PRELSEY KAVANAUGH is the descendant of John Smith Presley and Josephine Davis Presley, and the grandson of Lucinda Davis. At the time of the Riot, Plaintiff's family owned a home on N. Greenwood in the Greenwood District of Tulsa. Plaintiff's grandmother, Lucinda Davis, who was a member of the Creek Nation, owned a home near Kyle's Drugstore. Her home and all of its contents were destroyed.

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2 278. Plaintiff VERNELL KELLEY is an individual
3 residing in Kansas. Plaintiff is the sister of LULA MAE
4 JEFFERSON, MARTHA MCGLORIE SWINDALL, MATTHEW JEFFERSON, ROBERT
5 JEFFERSON, and MARGE WALLACE and the descendant of the Reverend
6 A.L. and Lucinda McGlorie who resided in the Greenwood District
7 at the time of the Riot.

8 279. Plaintiff BEVERLY NAILS KELLY, is an individual
9 residing in Oklahoma. Plaintiff is the sister of BRENDA NAILS
10 ALFORD AND CLARINDA NAILS and a descendant of James Nails. At
11 the time of the Riot, Plaintiff's father was a resident of the
12 Greenwood District.

13 280. Plaintiff LORELL KIRK is the widow of Thomas
14 Kirk. At the time of the Riot, Thomas Kirk lived in Greenwood
15 District of Tulsa.

16 281. Plaintiff FRANCINE JOHNSON KNAPPER is an
17 individual residing in Oklahoma. Plaintiff is the sister of
18 Plaintiffs OVETA MIXON and GLENDA LEBEAUX and a descendant of
19 Val Gene Johnson. At the time of the Riot, Plaintiff lived in
20 the Greenwood District. Plaintiff and family had to flee to
21 escape the rioting white mob.

22 282. Plaintiff JAMES BERNARD KNIGHTEN is the child of
23 James and Julia Knighten. Plaintiff is the brother of Plaintiff
24 ALLENE KNIGHTEN RAYFORD. At the time of the Riot, James and
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2 Julia Knighten lived in the Greenwood District of Tulsa.
3 Plaintiff's parents lost everything in the Tulsa Race Riot
4 including the family home, a small rental house, service
5 station, small shop and a tow story store front building. They
6 also lost a car and a truck. The approximate value of the
7 property lost is \$100,000 including furnishings.

8 283. Plaintiff MAXINE JACKSON LACY is the daughter of
9 Ed and Cory Jackson and the granddaughter of Ella Johnson. At
10 the time of the Riot, Ed Jackson, Cory Jackson, and Ella Johnson
11 owned two homes, one on N. Owasso and the other on Easton near
12 Mt. Zion Baptist Church. The house on Easton was completely
13 destroyed in the Riot. Plaintiff's father attempted to escape
14 with his family. Plaintiff's pregnant mother fell down during
15 her escape. Plaintiff's family fled to Claremore, Oklahoma,
16 where they were rescued by their employer, Miller Hamett.
17 Plaintiff's grandmother, Ella Johnson disappeared and was never
18 heard from again.

19 284. Plaintiff SANDRA JEAN DAVIS LANDRUM is an
20 individual residing in Tulsa, Oklahoma. Plaintiff is the sister
21 of Plaintiffs MILDRED LOUISE DAVIS SCOTT, THERESA DAVIS SCOTT,
22 and FRED DAVIS. Plaintiffs are the surviving children of Thomas
23 R. Davis and Rosa Davis. At the time of the Riot, Thomas R.
24 Davis and Rosa Davis lived in the Greenwood District of Tulsa.

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2 285. Plaintiff CAESAR LATIMER is an individual
3 residing in Tulsa, Oklahoma. Plaintiff is the brother of
4 Plaintiffs REV. BRADFORD BISHOP, LISA LATIMER, PATRICE LATIMER,
5 JAYPHEE LATIMER, JAMES HAROLD LATIMER, CHARLES SYLVESTER
6 LATIMER, JULIUS PEGUES. Plaintiffs are the children of James
7 Harold and Julia Latimer, who resided in the Greenwood District
8 of Tulsa at the time of the Riot.

9 286. Plaintiff CHARLES SYLVESTER LATIMER, is an
10 individual residing in Tulsa, Oklahoma. Plaintiff is the
11 brother of Plaintiffs REV. BRADFORD BISHOP, LISA LATIMER,
12 PATRICE LATIMER, JAYPHEE LATIMER, CAESAR LATIMER, JAMES HAROLD
13 LATIMER, JULIUS PEGUES. Plaintiffs are the children of James
14 Harold and Julia Latimer, who resided in the Greenwood District
15 of Tulsa at the time of the Riot.

16 287. Plaintiff HAZEL LATIMER is the widow of Fred
17 Latimer, Sr. At the time of the Riot, Fred Latimer, Sr. lived
18 in Greenwood District of Tulsa.

19 288. Plaintiff JAMES HAROLD LATIMER is an individual
20 residing in Tulsa, Oklahoma. Plaintiff is the brother of
21 Plaintiffs REV. BRADFORD BISHOP, LISA LATIMER, PATRICE LATIMER,
22 JAYPHEE LATIMER, CAESAR LATIMER, CHARLES SYLVESTER LATIMER,
23 JULIUS PEGUES. Plaintiffs are the children of James Harold and
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2 Julia Latimer, who resided in the Greenwood District of Tulsa at
3 the time of the Riot.

4 289. Plaintiff JAYPHEE LATIMER is an individual
5 residing in Tulsa, Oklahoma. Plaintiff is the brother of
6 Plaintiffs REV. BRADFORD BISHOP, LISA LATIMER, PATRICE LATIMER,
7 CAESAR LATIMER, JAMES HAROLD LATIMER, CHARLES SYLVESTER LATIMER,
8 JULIUS PEGUES. Plaintiffs are the children of James Harold and
9 Julia Latimer, who resided in the Greenwood District of Tulsa at
10 the time of the Riot.

11 290. Plaintiff LISA LATIMER, is an individual
12 residing in Tulsa, Oklahoma. Plaintiff is the brother of
13 Plaintiffs REV. BRADFORD BISHOP, PATRICE LATIMER, JAYPHEE
14 LATIMER, CAESAR LATIMER, JAMES HAROLD LATIMER, CHARLES SYLVESTER
15 LATIMER JULIUS PEGUES. Plaintiffs are the children of James
16 Harold and Julia Latimer, who resided in the Greenwood District
17 of Tulsa at the time of the Riot.

18 291. Plaintiff PATRICE LATIMER, is an individual
19 residing in Tulsa, Oklahoma. Plaintiff is the brother of
20 Plaintiffs REV. BRADFORD BISHOP, LISA LATIMER, JAYPHEE LATIMER,
21 CAESAR LATIMER, JAMES HAROLD LATIMER, CHARLES SYLVESTER LATIMER,
22 JULIUS PEGUES. Plaintiffs are the children of James Harold and
23 Julia Latimer, who resided in the Greenwood District of Tulsa at
24 the time of the Riot.

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2 292. Plaintiff BERNICE LAWLER is the daughter of
3 Wilma Kirkwood. Plaintiff is the sister of Plaintiff LORRAINE
4 MCFARLAND. At the time of the Riot, Wilma Kirkwood lived in the
5 Greenwood District of Tulsa. Plaintiffs' mother witnessed the
6 white mob lynch an African American during the Tulsa Race Riot.

7 293. Plaintiff EDWARD LAWSON is an individual
8 residing in Beverly Hills, California. Plaintiff is the brother
9 of Plaintiffs NAOMI LAWSON BROWN, WILBUR FOSTER, and RONALD EARL
10 MOORE. Plaintiffs are the sons and daughters of Naomi Foster
11 Moore and the grandson of Mattie Pearl Calhoun. At the time of
12 the Riot, Naomi Foster Moore and Mattie Pearl Calhoun lived in
13 the Greenwood District of Tulsa.

14 294. Plaintiff JOHNNYE CANNON LAWSON is an individual
15 residing in Houston, Texas. Plaintiff is the sister of
16 Plaintiffs NATHANIEL CANNON, HENRY CANNON, and MILDRED CANNON
17 WALLACE. Plaintiffs are the sons and daughters Johnnye M.
18 Mitchell Cannon and grandchildren of Charles and Jessie
19 Mitchell. At the time of the Riot, Johnnye M. Mitchell Cannon,
20 Charles Cannon, and Jessie Mitchell lived in the Greenwood
21 District of Tulsa. Plaintiffs' mother and grandparents were
22 forced to flee Greenwood in order save their lives. Plaintiffs'
23 parents and grandparent's home was burned to the ground.

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2 295. Plaintiff MARCUS LAWSON is an individual
3 residing in Colorado Springs, Colorado. Plaintiff is the
4 brother of Plaintiffs NAOMI LAWSON BROWN, EDWARD LAWSON, WILBUR
5 FOSTER, and RONALD EARL MOORE. Plaintiffs are the sons and
6 daughters of Naomi Foster Moore and the grandson of Mattie Pearl
7 Calhoun. At the time of the Riot, Naomi Foster Moore and Mattie
8 Pearl Calhoun lived in the Greenwood District of Tulsa.

9 296. Plaintiff MARGARET ANN LAWSON is an individual
10 residing in Colorado Springs, Colorado. Plaintiff is the sister
11 of Plaintiffs NAOMI LAWSON BROWN, EDWARD LAWSON, WILBUR FOSTER,
12 and RONALD EARL MOORE. Plaintiffs are the sons and daughters of
13 Naomi Foster Moore and the grandson of Mattie Pearl Calhoun. At
14 the time of the Riot, Naomi Foster Moore and Mattie Pearl
15 Calhoun lived in the Greenwood District of Tulsa.

16 297. Plaintiff PALMER LAWSON, JR. is an individual
17 residing in Buffalo, New York. Plaintiff is a descendant of
18 Londy Bohannon and Travelene Bohannon Lawson. At the time of
19 the Riot, Londy Bohannon and Travelene Bohannon Lawson lived the
20 Greenwood District of Tulsa.

21 298. Plaintiff GLENDA LEBEAUX is an individual
22 residing in Oklahoma. Plaintiff is the sister of Plaintiffs
23 OVETA MIXON and FRANCINE JOHNSON KNAPPER and a descendant of Val
24 Gene Johnson. At the time of the Riot, Plaintiff lived in the
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2 Greenwood District. Plaintiff and family had to flee to escape
3 the rioting white mob.

4 299. Plaintiff MARGARET LEE is an individual residing
5 in Oklahoma. Plaintiff is the grandchild of Trishie Wright. At
6 the time of the Riot, Trishie Wright lived in the Greenwood
7 District of Tulsa.

8 300. Plaintiff NORMA JEAN DENNIE LESHIE is the
9 grandchild of Howard and Ida Rodgers. At the time of the Riot,
10 Howard and Ida Rodgers lived in the 100 or 200 block of Hartford
11 Street in the Greenwood District of Tulsa. Plaintiff's parents'
12 home was seriously damaged during the Tulsa Race Riot. Their
13 uncle, George Dennie, Jr. was injured during the Tulsa Race Riot
14 and hospitalized.

15 301. Plaintiff JIMMIE LEWIS is an individual residing
16 in Tulsa, Oklahoma. He is the brother of LORRAINE LEWIS and JOE
17 LEWIS. Plaintiffs are the children of Willie Lewis, who resided
18 in the Greenwood District of Tulsa at the time of the Riot.

19 302. Plaintiff JOE LEWIS is an individual residing in
20 Tulsa, Oklahoma. He is the brother of LORRAINE LEWIS and JIMMIE
21 LEWIS. Plaintiffs are the children of Willie Lewis, who resided
22 in the Greenwood District of Tulsa at the time of the Riot.

23 303. Plaintiff LORRAINE LEWIS is an individual
24 residing in Tulsa, Oklahoma. She is the sister JIMMIE LEWIS and
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2 JOE LEWIS. Plaintiffs are the children of Willie Lewis, who
3 resided in the Greenwood District of Tulsa at the time of the
4 Riot.

5 304. Plaintiff CORTEZ LOCKARD is an individual
6 serving in the United States Army and is stationed in Japan.
7 Plaintiff is the brother of Plaintiffs SELMA LOCKARD, FRANK
8 LOCKARD, JESSIE MAE LOCKARD, EDWARD LOCKARD, ERNEST LOCKARD,
9 OSCAR LOCKARD, and EMMA LOCKARD HORN. Plaintiffs are children
10 of Joe Lockard and Rina Hawkins-Lockard. At the time of the
11 Riot, Joe Lockard and Rina Hawkins-Lockard lived in the
12 Greenwood District of Tulsa.

13 305. Plaintiff EDWARD LOCKARD is an individual
14 residing in Chicago, Illinois. Plaintiff is the brother of
15 Plaintiffs SELMA LOCKARD, FRANK LOCKARD, JESSIE MAE LOCKARD,
16 ERNEST LOCKARD, OSCAR LOCKARD, CORTEZ LOCKARD, and EMMA LOCKARD
17 HORN. Plaintiffs are children of Joe Lockard and Rina Hawkins-
18 Lockard. At the time of the Riot, Joe Lockard and Rina Hawkins-
19 Lockard lived in the Greenwood District of Tulsa.

20 306. Plaintiff ERNEST LOCKARD is an individual
21 residing in Detroit, Michigan. Plaintiff is the brother of
22 Plaintiffs SELMA LOCKARD, FRANK LOCKARD JESSIE MAE LOCKARD,
23 EDWARD LOCKARD, OSCAR LOCKARD, CORTEZ LOCKARD, and EMMA LOCKARD
24 HORN. Plaintiffs are children of Joe Lockard and Rina Hawkins-
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2 Lockard. At the time of the Riot, Joe Lockard and Rina Hawkins-
3 Lockard lived in the Greenwood District of Tulsa.

4 307. Plaintiff FRANK LOCKARD is an individual
5 residing in Tulsa, Oklahoma. Plaintiff is the brother of
6 Plaintiffs SELMA LOCKARD, JESSIE MAE LOCKARD, EDWARD LOCKARD,
7 ERNEST LOCKARD, OSCAR LOCKARD, CORTEZ LOCKARD, and EMMA LOCKARD
8 HORN. Plaintiffs are children of Joe Lockard and Rina Hawkins-
9 Lockard. At the time of the Riot, Joe Lockard and Rina Hawkins-
10 Lockard lived in the Greenwood District of Tulsa.

11 308. Plaintiff JESSIE MAE LOCKARD is an individual
12 residing in Detroit, Michigan. Plaintiff is the sister of
13 Plaintiffs SELMA LOCKARD, FRANK LOCKARD, EDWARD LOCKARD, ERNEST
14 LOCKARD, OSCAR LOCKARD, CORTEZ LOCKARD, and EMMA LOCKARD HORN.
15 Plaintiffs are children of Joe Lockard and Rina Hawkins-Lockard.
16 At the time of the Riot, Joe Lockard and Rina Hawkins-Lockard
17 lived in the Greenwood District of Tulsa.

18 309. Plaintiff OSCAR LOCKARD is an individual
19 residing in Detroit, Michigan. Plaintiff is the brother of
20 Plaintiffs SELMA LOCKARD, FRANK LOCKARD, JESSIE MAE LOCKARD,
21 EDWARD LOCKARD, ERNEST LOCKARD, CORTEZ LOCKARD, and EMMA LOCKARD
22 HORN. Plaintiffs are children of Joe Lockard and Rina Hawkins-
23 Lockard. At the time of the Riot, Joe Lockard and Rina Hawkins-
24 Lockard lived in the Greenwood District of Tulsa.

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2 310. Plaintiff SELMA LOCKARD is an individual
3 residing in Tulsa, Oklahoma. Plaintiff is the sister of
4 Plaintiffs FRANK LOCKARD, JESSIE MAE LOCKARD, EDWARD LOCKARD,
5 ERNEST LOCKARD, OSCAR LOCKARD, CORTEZ LOCKARD, and EMMA LOCKARD
6 HORN. Plaintiffs are children of Joe Lockard and Rina Hawkins-
7 Lockard. At the time of the Riot, Joe Lockard and Rina Hawkins-
8 Lockard lived in the Greenwood District of Tulsa.

9 311. Plaintiff MARY LOUPE is the widow of Richard
10 Wesley Loupe. At the time of the Riot, Richard Wesley Loupe
11 lived in Greenwood District of Tulsa.

12 312. Plaintiff CATHERINE MARTIN is the child of Ruth
13 Fowler Martin and the grandchild of Richard and Viola Fowler
14 (Huggins). Plaintiff is the sister of Plaintiffs DOROTHY JONES,
15 NANCY MARTIN, JAMES PRESTON MARTIN, FELTON MARTIN, LESLIE BEARD.
16 At the time of the Riot, Ruth Fowler Martin, Richard Fowler, and
17 Viola Fowler lived in the Greenwood District of Tulsa.

18 Plaintiff's mother fled with her husband, Richard Fowler, with
19 her child, Ruth Fowler, from the rioting white mob. The rioting
20 white mob burned down their home and destroyed all their
21 property.

22 313. Plaintiff FELTON MARTIN is the child of Ruth
23 Fowler Martin and the grandchild of Richard and Viola Fowler
24 (Huggins). Plaintiff is the brother of DOROTHY JONES, NANCY
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MARTIN, CATHERINE MARTIN, JAMES PRESTON MARTIN, LESLIE BEARD.

At the time of the Riot, Ruth Fowler Martin, Richard Fowler, and Viola Fowler lived in the Greenwood District of Tulsa.

Plaintiff's mother fled with her husband, Richard Fowler, with her child, Ruth Fowler, from the rioting white mob. The rioting white mob burned down their home and destroyed all their property.

314. Plaintiff JAMES PRESTON MARTIN is the child of Ruth Fowler Martin and the grandchild of Richard and Viola Fowler (Huggins). Plaintiff is the brother of Plaintiffs DOROTHY JONES, NANCY MARTIN, CATHERINE MARTIN, FELTON MARTIN, LESLIE BEARD. At the time of the Riot, Ruth Fowler Martin, Richard Fowler, and Viola Fowler lived in the Greenwood District of Tulsa. Plaintiff's mother fled with her husband, Richard Fowler, with her child, Ruth Fowler, from the rioting white mob. The rioting white mob burned down their home and destroyed all their property.

315. Plaintiff NANCY MARTIN is the child of Ruth Fowler Martin and the grandchild of Richard and Viola Fowler (Huggins). Plaintiff is the sister of Plaintiff DOROTHY JONES, CATHERINE MARTIN, JAMES PRESTON MARTIN, FELTON MARTIN, LESLIE BEARD. At the time of the Riot, Ruth Fowler Martin, Richard Fowler, and Viola Fowler lived in the Greenwood District of

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2 Tulsa. Plaintiff's mother fled with her husband, Richard
3 Fowler, with her child, Ruth Fowler, from the rioting white mob.
4 The rioting white mob burned down their home and destroyed all
5 their property.

6 316. Plaintiff FAYE MAY is an individual residing in
7 Oklahoma. Plaintiff is the grandchild of Trishie Wright. At the
8 time of the Riot, Trishie Wright lived in the Greenwood District
9 of Tulsa.

10 317. Plaintiff SARAH CURVAY MAYSHAW is an individual
11 residing in Tulsa, Oklahoma. Plaintiff was born on June 13,
12 1923. Plaintiff is the daughter of Arthur Chester Curvay and
13 Mattie Owens Curvay. At the time of the Riot, Arthur Chester
14 Curvay and Mattie Owens Curvay resided at 1411 N. Owasso in the
15 Greenwood District of Tulsa. The house was ransacked and
16 damaged by the white mob. The only personal property remaining
17 at the house was a pair of rubber boots with \$300.00 hidden
18 inside.

19 318. Plaintiff LEONA AUSTIN MCCAIN is the daughter of
20 Simon and Senora Austin. Plaintiff is the sister of AILEEN
21 JOANNE AUSTIN COBURN. At the time of the Riot, Simon and Senora
22 Austin lived in the Greenwood district of Tulsa.

23 319. Plaintiff PAULINE MCCANTS is an individual
24 residing in California. Plaintiff a descendant of Ernest and
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2 Gladys Crooms, the deceased descendants of Riot Survivor Mary
3 Horn, Tulsa's first African-American policewoman. At the time
4 of the Riot, Mary Horn lived on Archer Avenue in the area known
5 as "The Hill." Plaintiff's grandmother's home was burned to the
6 ground and all personal possessions were destroyed.

7 320. Plaintiff DENISE MCCRAY is an individual
8 residing in Tulsa, Oklahoma. Plaintiff is a descendant of Ed
9 and Viola Wallace. At the time of the Riot, Ed and Viola
10 Wallace lived in Greenwood District of Tulsa.

11 321. Plaintiff OTIS MCCRAY III is a descendant of Ed
12 and Viola Wallace. At the time of the Riot, Ed and Viola
13 Wallace lived in Greenwood District of Tulsa.

14 322. Plaintiff LORRAINE MCFARLAND is the daughter of
15 Wilma Kirkwood. Plaintiff is the sister of Plaintiff BERNICE
16 LAWLER. At the time of the Riot, Wilma Kirkwood lived in the
17 Greenwood District of Tulsa. Plaintiffs' mother witnessed the
18 white mob lynch an African American during the Tulsa Race Riot.

19 323. Plaintiff JEAN WILLIAMS MCGILL is the niece of
20 Judge Amos T. Hall. At the time of the Riot, Judge Amos T. Hall
21 lived in the Greenwood District of Tulsa. Plaintiff's uncle was
22 seriously injured during the Tulsa Race Riot.

23 324. Plaintiff DONALD JOHN MCGOWAN is an individual
24 residing in Tulsa, Oklahoma. He is the son of Clyde William
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2 McGowan, who resided in the Greenwood District of Tulsa at the
3 time of the Riot.

4 325. Plaintiff WALLACE MCLEOD, JR. is in individual
5 residing in Tulsa. Plaintiff is the brother of Plaintiffs
6 AUDELE MCLEOD BEEKS, FELICIA MCLEOD JOHNSON, and PATRICIA MCLEOD
7 STEPHENSON. Plaintiffs are the sons and daughters of Wallace
8 McLeod, Sr. and Bessie Audele Beatty McLeod. At the time of the
9 Riot, Wallace McLeod, Sr. and Bessie Audele Beatty McLeod lived
10 at 301 N. Elgin in the Greenwood District of Tulsa. The rioting
11 white mob burned their home to the ground. Plaintiff's father
12 was unlawfully detained against his will at the Convention
13 Center detention center.

14 326. Plaintiff BETTY PRESLEY MCMILLAN is the
15 descendant of John Smith Presley and Josephine Davis Presley,
16 and the grandson of Lucinda Davis. At the time of the Riot,
17 Plaintiff's family owned a home on N. Greenwood in the Greenwood
18 District of Tulsa. Plaintiff's grandmother, Lucinda Davis, who
19 was a member of the Creek Nation, owned a home near Kyle's
20 Drugstore. Her home and all of its contents were destroyed.

21 327. Plaintiff LADAWNA MILLER is an individual
22 residing in Austin, Texas. Plaintiff is the descendant of Tom
23 Swift Hamel and Luvenia Williams. At the time of the Riot, Tom
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2 Swift Hamel and Luvenia Williams lived in the Greenwood District
3 of Tulsa.

4 328. Plaintiff MILDRED MARIAN HAMEL MILLER is an
5 individual residing in Austin, Texas. Plaintiff is the
6 descendant of Tom Swift Hamel and Luvenia Williams. At the time
7 of the Riot, Tom Swift Hamel and Luvenia Williams lived in the
8 Greenwood District of Tulsa.

9 329. Plaintiff PEGGY ANN MCRUFFIN MITCHELL is an
10 individual residing in Dallas, Texas. Plaintiff is the daughter
11 of John B. McRuffin and Hattie Johnson McRuffin. At the time of
12 the Riot, John B. McRuffin and Hattie Johnson McRuffin resided
13 in the Greenwood District of Tulsa. Plaintiff's family home was
14 destroyed as well as all the family's personal possessions
15 including jewelry, a fur coat and clothing. Plaintiff's parents
16 escaped to St. Louis and later moved to Detroit Michigan.

17 330. Plaintiff OVETA MIXON is an individual residing
18 in California. Plaintiff is the sister of GLENDA LEBEAUX and
19 FRANCINE JOHNSON KNAPPER and a descendant of Val Gene Johnson.
20 At the time of the riot, Plaintiff lived the Greenwood District.
21 Plaintiff and family had to flee to escape the rioting white
22 mob.

23 331. Plaintiff ELIZABETH PRESLEY MONDAY is the
24 descendant of John Smith Presley and Josephine Davis Presley,
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2 and the grandson of Lucinda Davis. At the time of the Riot,
3 Plaintiff's family owned a home on N. Greenwood in the Greenwood
4 District of Tulsa. Plaintiff's grandmother, Lucinda Davis, who
5 was a member of the Creek Nation, owned a home near Kyle's
6 Drugstore. Her home and all of its contents were destroyed.

7 332. Plaintiff PAT GALBRAITH MOORE is an individual
8 residing in Tulsa, Oklahoma. She is the daughter of Mattie King
9 Mitchell, who resided in the Greenwood District of Tulsa at the
10 time of the Riot.

11 333. Plaintiff RONALD EARL MOORE is an individual
12 residing in Springfield, Missouri. Plaintiff is the brother of
13 Plaintiffs NAOMI LAWSON BROWN, EDWARD LAWSON, and WILBUR FOSTER
14 is an individual residing in Los Angeles, California. Plaintiffs
15 are the sons and daughters of Naomi Foster Moore and the
16 grandson of Mattie Pearl Calhoun. At the time of the Riot,
17 Naomi Foster Moore and Mattie Pearl Calhoun lived in the
18 Greenwood District of Tulsa.

19 334. Plaintiff EVA GAMBLE MORRIS is an individual
20 residing in Tulsa, Oklahoma. She is the sister of AMY GAMBLE
21 EIDSON. Plaintiffs are the children of Harry Gamble, Jr., who
22 resided in the Greenwood District of Tulsa at the time of the
23 Riot.

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2 335. Plaintiff CLARINDA NAILS is an individual
3 residing in Oklahoma. Plaintiff is the sister of BEVERLY NAILS
4 KELLY AND BRENDA NAILS ALFORD and a descendant of James Nails.
5 At the time of the Riot, Plaintiffs father was a resident of the
6 Greenwood District.

7 336. Plaintiff TERRY NASH is the son of Oscar and
8 Mollie Nash. At the time of the Riot, Plaintiff's parents lived
9 on North Owasso Street in the Greenwood District of Tulsa at the
10 time of the Riot. All of their property was destroyed during
11 the Riot.

12 337. Plaintiff EARTHA MCALESTER NORMAN is an
13 individual residing in Oklahoma. Plaintiff is the sister of
14 Plaintiff EDITH MCALESTER BARNES and a descendant of Clarence
15 and Margie King. At the time of the Riot, Plaintiffs great-aunt
16 and uncle resided in the Greenwood District.

17 338. Plaintiff MATTIE DAVIS OLIVER is the daughter of
18 Mary Ella Green. At the time of the Riot, Mary Ella Green lived
19 in the Greenwood District of Tulsa with her sister. Ms. Ella
20 Green and her sister fled when the riot began to an all-African
21 American town, Wybark, OK. They met other African Americans on
22 the Muskogee Bridge attempting to cross the bridge to come to
23 Tulsa to assist the Greenwood residents. White policemen
24 prevented them from entering Tulsa.

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2 339. Plaintiff LAVADA LOUISE PARKER OSBOURNE is the
3 daughter of Steve and Mary Lue Hicks Parker. At the time of the
4 Riot, Steve and Mary Lue Hicks Parker owned a home and Parker's
5 Grocery and Restaurant, which was located at 1439 Iroquois
6 Street in the Greenwood District of Tulsa. Plaintiff's parents
7 were unlawfully detained against their will in one of the
8 detention centers.

9 340. Plaintiff AUDREY BANKS PARSON is the child of
10 Nick Banks. Plaintiff is the sister of Plaintiffs NICHOLAS A.
11 BANKS and BERNICE E. BANKS DAVIS. At the time of the Riot, Nick
12 Banks owned a pool hall and was a chef at the Ketchum Hotel in
13 the Greenwood District of Tulsa.

14 341. Plaintiff JOHN W. PATTON is an individual
15 residing in Edmond, Oklahoma. Plaintiff is the son of Calvin
16 Patton. At the time of the Riot, Calvin Patton lived in the
17 Greenwood District of Tulsa.

18 342. Plaintiff LENA MAE JOHNSON PAYNE is an
19 individual residing in Plumerville, Arkansas. She is the sister
20 of SHIRLEY A. JOHNSON TYUS, JANICE LOU JOHNSON ROSS, MARILYN KAY
21 JOHNSON COLEY, and RONALD WAYNE JOHNSON. Plaintiffs are the
22 children of Bennie Lee Johnson, who resided in the Greenwood
23 District of Tulsa at the time of the Riot.

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2 343. Plaintiff JULIUS PEGUES is an individual
3 residing in Tulsa, Oklahoma. Plaintiff is the brother of
4 Plaintiffs REV. BRADFORD BISHOP, LISA LATIMER, PATRICE LATIMER,
5 JAYPHEE LATIMER, CAESAR LATIMER, JAMES HAROLD LATIMER, CHARLES
6 SYLVESTER LATIMER. Plaintiffs are the children of James Harold
7 and Julia Latimer, who resided in the Greenwood District of
8 Tulsa at the time of the Riot.

9 344. Plaintiff GERALDINE PERRYMAN-TEASE is an
10 individual residing in Tulsa, Oklahoma. The plaintiff is the
11 daughter of Addie Perryman-Tease and the niece of Bob Perryman.
12 At the time of the Riot, Addie Perryman-Tease and Bob Perryman
13 lived in the Greenwood District of Tulsa. Bob Perryman was
14 killed during the Riot.

15 345. Plaintiff WANDA EWING POPE is an individual
16 residing in Accra, Ghana, West Africa. Plaintiff is the sister
17 of Plaintiffs JO ANN EWING, ROBERT EWING, and BILL EWING.
18 Plaintiffs are the children of Eva Small. At the time of the
19 Riot, Eva Small lived in the Greenwood District of Tulsa.

20 346. Plaintiff ESCO PORTERFIELD is an individual
21 residing in Oklahoma. Plaintiff is the brother of Plaintiffs
22 PAM VINCENT and MARK PORTERFIELD and a descendant of Theodore
23 Porterfield. At the time of the Riot, Plaintiff's father
24 resided at 323 N. Frankfort Avenue in the Greenwood District.

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2 347. Plaintiff MARK PORTERFIELD is an individual
3 residing in Oklahoma. Plaintiff is the brother of Plaintiffs
4 ESCO PORTERFIELD and PAM VINCENT and a descendant of Theodore
5 Porterfield. At the time of the Riot, Plaintiff's father
6 resided at 323 N. Frankfort Avenue in the Greenwood District.

7 348. Plaintiffs JILL ELIZABETH PRESLEY is the great
8 grandchild of Lucinda Pittman Davis, granddaughter of Lucinda
9 Davis Pittman and daughter of Doris Patricia Presley. At the
10 time of the Riot, Lucinda Pittman Davis, Lucinda Davis Pittman
11 lived in the Greenwood District of Tulsa. The Davis' family
12 home was burned to the ground during the Tulsa Race Riot and all
13 the family's property was lost.

14 349. Plaintiff JOYCE MARIE PRESLEY is the descendant
15 of John Smith Presley and Josephine Davis Presley, and the
16 grandson of Lucinda Davis. At the time of the Riot, Plaintiff's
17 family owned a home on N. Greenwood in the Greenwood District of
18 Tulsa. Plaintiff's grandmother, Lucinda Davis, who was a member
19 of the Creek Nation, owned a home near Kyle's Drugstore. Her
20 home and all of its contents were destroyed.

21 350. Plaintiff LISA PRESLEY is the great grandchild
22 of Lucinda Pittman Davis, granddaughter of Lucinda Davis Pittman
23 and daughter of Doris Patricia Presley. At the time of the
24 Riot, Lucinda Pittman Davis, Lucinda Davis Pittman lived in the
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2 Greenwood District of Tulsa. The Davis' family home was burned
3 to the ground during the Tulsa Race Riot and all the family's
4 property was lost.

5 351. Plaintiff RAYMOND PRESLEY is the son of John
6 Smith Presley and Josephine Davis Presley, and the grandson of
7 Lucinda Davis. At the time of the Riot, Plaintiff's family owned
8 a home on N. Greenwood in the Greenwood District of Tulsa.
9 Plaintiff's grandmother, Lucinda Davis, who was a member of the
10 Creek Nation, owned a home near Kyle's Drugstore. Her home and
11 all of its contents were destroyed.

12 352. Plaintiff RONALD DEAN PRESLEY is the descendant
13 of John Smith Presley and Josephine Davis Presley, and the
14 grandson of Lucinda Davis. At the time of the Riot, Plaintiff's
15 family owned a home on N. Greenwood in the Greenwood District of
16 Tulsa. Plaintiff's grandmother, Lucinda Davis, who was a member
17 of the Creek Nation, owned a home near Kyle's Drugstore. Her
18 home and all of its contents were destroyed.

19 353. Plaintiff FLOYD PRICE is an individual residing
20 in Tulsa, Oklahoma. Plaintiff is the brother of Plaintiff
21 CAROLYN PRICE JOHNSON. Plaintiffs are the children of Ruth
22 Fairchild Price. At the time of the Riot, Ruth Fairchild Price
23 lived in the Greenwood District of Tulsa.

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2 354. Plaintiff JANE FAIR PRUETT is an individual
3 residing in Tulsa, Oklahoma. She is the sister of JANET FAIR,
4 STANLEY FAIR, JR., BRENDA FAIR CAMPBELL, GERALDINE FAIR JESSIE,
5 and YVONNE FAIR SHAW. Plaintiffs are the children of Stanley
6 Fair, Sr., who resided in the Greenwood District of Tulsa at the
7 time of the Riot.

8 355. Plaintiff MARCIA WALKER PUCKETT is an individual
9 residing in Chicago, Illinois. Plaintiff is a descendant of
10 Raphael Walker. At the time of the Riot, Raphael Walker lived
11 in the Greenwood District of Tulsa.

12 356. Plaintiff JOYCE RAMSEY is an individual residing
13 in Tulsa, Oklahoma. Plaintiff is the sister of Plaintiff Maxine
14 JESSIE VADEN. Plaintiffs are the daughters of Hosea Vaden and
15 Linda Agnetta Vaden. At the time of the Riot, Hosea Vaden and
16 Linda Agnetta Vaden lived in the Greenwood District of Tulsa.

17 357. Plaintiff ALLENE KNIGHTEN RAYFORD is the child
18 of James and Julia Knighten. Plaintiff is the sister of
19 Plaintiff JAMES BERNARD KNIGHTEN. At the time of the Riot,
20 James and Julia Knighten lived in the Greenwood District of
21 Tulsa. Plaintiff's parents lost everything in the Tulsa Race
22 Riot including the family home, a small rental house, service
23 station, small shop and a tow story store front building. They
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2 also lost a car and a truck. The approximate value of the
3 property lost is \$100,000 including furnishings.

4 358. Plaintiff MAE ETTA REYNOLDS is an individual
5 residing in Tulsa, Oklahoma. Plaintiff is the sister of
6 Plaintiff LEROY KIRK, JR. Plaintiffs are the children of Mary
7 Payne. At the time of the Riot, Mary Payne lived in the
8 Greenwood District of Tulsa.

9 359. Plaintiff SHIRLEY RIDLEY is an individual
10 residing in Chicago, Illinois. Plaintiff is the sister of
11 Plaintiff DELORES HARRINGTON. Plaintiffs are the daughters of
12 Marion Spears. At the time of the Riot, Marion Spears lived in
13 the Greenwood District of Tulsa.

14 360. Plaintiff PATSY ROBINSON is the granddaughter of
15 Pearl Oliver, the daughter of Montana Wright and the niece of
16 Paris Oliver. At the time of the Riot, Pearl Oliver and Paris
17 Oliver lived in the Greenwood District of Tulsa. Plaintiff and
18 her family lived on Greenwood at the time of the Riot.
19 Plaintiff's grandmother suffered an emotional and mental
20 breakdown as a result of the Riot and was never the same.
21 Plaintiff's uncle was harmed in the Riot. Plaintiff's family
22 home was destroyed in the Riot.

23 361. Plaintiff FRANK EUGENE RODGERS is the grandchild
24 of Howard and Ida Rodgers. At the time of the Riot, Howard and
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Ida Rodgers lived in the 100 or 200 block of Hartford Street in the Greenwood District of Tulsa. Plaintiff's parents' home was seriously damaged during the Tulsa Race Riot. Their uncle, George Dennie, Jr. was injured during the Tulsa Race Riot and hospitalized.

362. Plaintiff ERIC ROLLERSON is an individual residing in Tulsa, Oklahoma. He is the brother of LEON ROLLERSON, YVONNE ROLLERSON, and WILA ROLLERSON. Plaintiffs are the children of Lloyd and Myrtle Rollerson, who resided in the Greenwood District of Tulsa at the time of the Riot.

363. Plaintiff LEON ROLLERSON is an individual residing in Tulsa, Oklahoma. He is the brother of plaintiffs ERIC ROLLERSON, YVONNE ROLLERSON, and WILA ROLLERSON. Plaintiffs are the children of Lloyd and Myrtle Rollerson, who resided in the Greenwood District of Tulsa at the time of the Riot.

364. Plaintiff WILA ROLLERSON is an individual residing in Tulsa, Oklahoma. She is the sister of LEON ROLLERSON, ERIC ROLLERSON, and YVONNE ROLLERSON. Plaintiffs are the children of Lloyd and Myrtle Rollerson, who resided in the Greenwood District of Tulsa at the time of the Riot.

365. Plaintiff YVONNE ROLLERSON is an individual residing in Tulsa, Oklahoma. She is the sister of ERIC

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2 ROLLERSON, LEON ROLLERSON, and WILA ROLLERSON. Plaintiffs are
3 the children of Lloyd and Myrtle Rollerson, who resided in the
4 Greenwood District of Tulsa at the time of the Riot.

5 366. Plaintiff JANICE LOU JOHNSON ROSS is an
6 individual residing in Plumerville, Arkansas. She is the sister
7 of SHIRLEY A. JOHNSON TYUS, MARILYN KAY JOHNSON COLEY, LENA MAE
8 JOHNSON PAYNE, and RONALD WAYNE JOHNSON. Plaintiffs are the
9 children of Bennie Lee Johnson, who resided in the Greenwood
10 District of Tulsa at the time of the Riot.

11 367. Plaintiff BILLIE WAYNE RUCKER is the child of
12 Fannie Mae Bagby. Plaintiff is the sister of ERLINE CROSSLIN,
13 J.C. RUCKER, ROBERT C. RUCKER and ROSEZELLA TURNER. At the time
14 of the Riot, Fannie Mae Bagby lived in Greenwood District of
15 Tulsa.

16 368. Plaintiff J.C. RUCKER is the child of Fannie Mae
17 Bagby. Plaintiff is the brother of ERLINE CROSSLIN, BILLIE
18 WAYNE RUCKER, ROBERT C. RUCKER and ROSEZELLA TURNER. At the
19 time of the Riot, Fannie Mae Bagby lived in Greenwood District
20 of Tulsa.

21 369. Plaintiff ROBERT C. RUCKER is the child of
22 Fannie Mae Bagby. Plaintiff is the brother of Plaintiffs ERLINE
23 CROSSLIN, BILLIE WAYNE RUCKER, J.C. RUCKER, and ROSEZELLA
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2 TURNER. At the time of the Riot, Fannie Mae Bagby lived in
3 Greenwood District of Tulsa.

4 370. Plaintiff BOBBIE JEAN SAULET is an individual
5 residing in Kansas City, Missouri. She is the daughter of
6 Willie James and Dorothy Grayson, who resided in the Greenwood
7 District of Tulsa at the time of the Riot.

8 371. Plaintiff MILDRED LOUISE DAVIS SCOTT is an
9 individual residing in Detroit, Michigan. Plaintiff is the
10 sister of Plaintiffs THERESA DAVIS SCOTT, FRED DAVIS, and SANDRA
11 JEAN DAVIS LANDRUM. Plaintiffs are the surviving children of
12 Thomas R. Davis and Rosa Davis. At the time of the Riot, Thomas
13 R. Davis and Rosa Davis lived in the Greenwood District of
14 Tulsa.

15 372. Plaintiff THERESA DAVIS SCOTT is an individual
16 residing in Tulsa, Oklahoma. Plaintiff is the sister of
17 Plaintiffs MILDRED LOUISE DAVIS SCOTT, FRED DAVIS, and SANDRA
18 JEAN DAVIS LANDRUM. Plaintiffs are the surviving children of
19 Thomas R. Davis and Rosa Davis. At the time of the Riot, Thomas
20 R. Davis and Rosa Davis lived in the Greenwood District of
21 Tulsa.

22 373. Plaintiff YVONNE FAIR SHAW is an individual
23 residing in Tulsa, Oklahoma. She is the sister of JANE FAIR
24 PRUETT, BRENDA FAIR CAMPBELL, and GERALDINE FAIR JESSIE.
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1
2 Plaintiffs are the children of Stanley Fair, Sr., who resided in
3 the Greenwood District of Tulsa at the time of the Riot.

4 374. Plaintiff BILLY SHELTON is an individual
5 residing in Oklahoma City, Oklahoma. Plaintiff is the
6 grandchild of Trishie Wright. At the time of the Riot, Trishie
7 Wright lived in the Greenwood District of Tulsa.

8 375. Plaintiff DIANA LYNN SHELTON is the daughter of
9 Billy Shelton and granddaughter of Ollie Steele. Plaintiff is
10 the sister of Plaintiff and SHIRLEY SHELTON. At the time of the
11 Riot, Ollie Steele was a hairdresser and beauty shop owner in
12 the Greenwood District of Tulsa. Ollie Steele was crippled in
13 the riot. She was shot in the legs and her legs were burned.
14 She kept her legs wrapped with surgical wrap and walked with a
15 cane the rest of her life.

16 376. Plaintiff JOHNNY SHELTON an individual residing
17 in Los Angeles, California. Plaintiff FAYE MAY is an individual
18 residing in Oklahoma. Plaintiff is the grandchild of Trishie
19 Wright. At the time of the Riot, Trishie Wright lived in the
20 Greenwood District of Tulsa.

21 377. Plaintiff MAIME SHELTON is an individual
22 residing in Los Angeles, California. Plaintiff is the
23 grandchild of Trishie Wright. At the time of the Riot, Trishie
24 Wright lived in the Greenwood District of Tulsa.

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2 378. Plaintiff SHIRLEY SHELTON is the daughter of
3 Billy Shelton and granddaughter of Ollie Steele. Plaintiff is
4 the sister of Plaintiff DIANA LYNN SHELTON. At the time of the
5 Riot, Ollie Steele was a hairdresser and beauty shop owner in
6 the Greenwood District of Tulsa. Ollie Steele was crippled in
7 the riot. She was shot in the legs and her legs were burned.
8 She kept her legs wrapped with surgical wrap and walked with a
9 cane the rest of her life.

10 379. Plaintiff EUNA VANN SMITH is an individual
11 residing in Tulsa, Oklahoma. Plaintiff is the daughter of Guy
12 Vann and Ida Whitmore Vann. At the time of the Riot, Guy Vann
13 and Ida Whitmore Vann lived in the Greenwood District of Tulsa.

14 380. Plaintiff FRED SMITH is an individual residing
15 in Tulsa, Oklahoma. Plaintiff is the brother of Plaintiffs ROSIE
16 LEE JACKSON, FANNIE SMITH VERNER, and ERMA SMITH THOMPSON.
17 Plaintiffs are the children of Willis and Maggie Smith. At the
18 time of the Riot, Willis and Maggie Smith lived in the Greenwood
19 District of Tulsa.

20 381. Plaintiff HARRIET ADAMS SMITH is an individual
21 residing in Tulsa, Oklahoma. Plaintiff is a descendant of
22 Thomas and Tacora Adams. At the time of the Riot, Thomas and
23 Tacora Adams lived in the Greenwood District of Tulsa.
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2 382. Plaintiff ORA SMITH is an individual residing in
3 Oklahoma. Plaintiff is a widow of Willie Smith. At the time of
4 the Riot, Willie Smith lived in Greenwood District of Tulsa.

5 383. Plaintiff CLAUDIA MAUDE SMITHERMAN is the widow
6 of Theodore Smitherman. At the time of the Riot, Theodore
7 Smitherman lived in Greenwood District of Tulsa.

8 384. Plaintiff CATHRYN BELL SNODDY is the child of
9 J.D. and Ida Mae Bell and the grandchild of Isaac (Ike) and
10 Mollie Bell. Plaintiff is the sister of Plaintiffs MARY BELL
11 ARRINGTON and R.G. BELL. At the time of the Riot, J.D. Bell,
12 Ida Mae Bell, Isaac Bell and Mollie Bell lived in the Greenwood
13 District of Tulsa. Their mother, Ida Mae Bell, was 9 months
14 pregnant at the time of the Tulsa Race Riot. She told them that
15 she had to walk for a long time on June 1, 1921 along the
16 railroad tracks. She saw bodies thrown on the church and trucks
17 carrying bodies to the 15th Street area where she believed they
18 were buried in mass graves. The mother gave birth ten days
19 after the Tulsa Race Riot and had "female trouble" ever since
20 the Tulsa Race Riot. The Bell's owned a family business, Bells'
21 Barbershop on the corner of Greenwood and Archer. Their home
22 was burned down during the riot and the family rebuilt it.

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2 385. Plaintiff BETTY SPEARS is the widow of Marvin
3 Spears. At the time of the Riot, Marvin Spears lived in
4 Greenwood District of Tulsa.

5 386. Plaintiff DIANE ANDERSON STEELE is the child of
6 Mary Franklin Anderson. Plaintiff is the sister of RHONDA
7 ANDERSON, ROBERT EARL ANDERSON, and MARIETTA ANDERSON WAITERS.
8 At the time of the Riot, Ms. Anderson lived in the Greenwood
9 District of Tulsa.

10 387. Plaintiff PATRICIA MCLEOD STEPHENSON is the
11 sister of Plaintiffs AUDELE MCLEOD BEEKS, FELICIA MCLEOD JOHNSON
12 and WALLACE MCLEOD. Plaintiffs are the sons and daughters of
13 Wallace McLeod, Sr. and Bessie Audele Beatty McLeod. At the
14 time of the Riot, Wallace McLeod, Sr. and Bessie Audele Beatty
15 McLeod lived at 301 N. Elgin in the Greenwood District of Tulsa.
16 The rioting white mob burned their home to the ground.
17 Plaintiff's father was unlawfully detained against his will at
18 the Convention Center detention center.

19 388. Plaintiff LAUREL STRADFORD is an individual
20 residing in the State of Illinois. Plaintiff is a descendant of
21 J.B. Stradford, a survivor of the riot. At the time of the
22 riot, Plaintiff's grandfather was a prominent lawyer, real
23 estate developer and the owner of the Stradford Hotel.
24 Plaintiff's grandfather fled to Kansas and then to Chicago,
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2 Illinois to avoid prosecution for inciting the Riot. Plaintiff's
3 grandfather filed a lawsuit against American Central Insurance
4 Company in Chicago, Illinois because he could not get a fair
5 hearing in Tulsa. Plaintiff's grandfather's case was dismissed
6 in 1925 and he never recovered any insurance proceeds for his
7 property losses.

8 389. Plaintiff ROSE STRIPLIN is the widow of
9 Sylvester Striplin, Sr. At the time of the Riot, Sylvester
10 Striplin, Sr. lived in Greenwood District of Tulsa.

11 390. Plaintiff CARRIE M. MCDONALD STROTHER an
12 individual residing at Kansas City, Missouri. Plaintiff is a
13 descendant of Carrie B. McDonald. At the time of the Riot,
14 Carrie B. McDonald owned a boarding house/hotel, a restaurant,
15 and a grocery store in the Greenwood District of Tulsa. The
16 rioting white mob looted or burned Carrie B. McDonald's leather
17 sofas and chairs and marble topped mahogany library tables
18 during the Riot.

19 391. Plaintiff MARTHA MCGLORIE SWINDALL is an
20 individual residing in Tulsa, Oklahoma. She is the daughter of
21 Reverend A.L. and Lucinda McGlorie, who resided in the Greenwood
22 District of Tulsa at the time of the Riot.

23 392. Plaintiff AUDREY TAYLOR is an individual
24 residing in Tulsa, Oklahoma. Plaintiff is the descendant of
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2 Osborne Monroe, Lottie Monroe, and Ester Tyree. At the time of
3 the Riot, Osborne Monroe, Lottie Monroe, and Ester Tyree lived
4 in the Greenwood District of Tulsa.

5 393. Plaintiff BYRON TAYLOR is an individual residing
6 in Tulsa, Oklahoma. Plaintiff is the descendant of Osborne
7 Monroe, Lottie Monroe, and Ester Tyree. At the time of the
8 Riot, Osborne Monroe, Lottie Monroe, and Ester Tyree lived in
9 the Greenwood District of Tulsa.

10 394. Plaintiff BOBBIE JEAN CARTER TENNYSON is an
11 individual residing in Tulsa, Oklahoma. Plaintiff is a
12 descendant of Robert Carter. At the time of the Riot, Robert
13 Carter lived in the Greenwood District of Tulsa.

14 395. Plaintiff SYLVESTER TERRY, JR. is a descendant
15 of Fannie Rose Frazier Jackson. At the time of the Riot, Fannie
16 Rose Frazier Jackson lived in Greenwood District of Tulsa.

17 396. Plaintiff MARGARET THARPE is the daughter of
18 Geraldine Smith Marks, the granddaughter of Omega Smith and the
19 great-granddaughter of Abigail Goodson. At the time of the
20 Riot, Geraldine Smith Marks, Omega Smith and Abigail Goodson
21 lived in the Greenwood District of Tulsa. Plaintiff's uncle
22 disappeared during the Riot and was never heard from again.

23 397. Plaintiff JERRY FIELDS THOMAS is an individual
24 residing in Oklahoma City, Oklahoma. Plaintiff is the brother
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2 of Plaintiffs IRMA THOMAS ANTHONY and LEONTYNE THOMAS HARRELL.
3 Plaintiffs are the children of Myrtle Fields Parker. At the
4 time of the Riot, Myrtle Fields Parker lived in the Greenwood
5 District of Tulsa.

6 398. Plaintiff JESSIE THOMAS is the grandchild of
7 Johnny Adams, children of Eliza Adams and nephew and niece of
8 "Saucer" Grayson. At the time of the Riot, Plaintiffs and
9 Plaintiffs mother lived on Jasper Street. Plaintiff's family
10 also owned six or seven rent houses on Jasper Street just off
11 Greenwood Avenue. Everything they owned was burned down by the
12 white mob. The family hid in an old shed behind their homes
13 near an alley and watched through cracks as the white mob set
14 fire to their property. The white mob was heavily armed,
15 shooting everywhere and their uncle, "Saucer" Grayson, was shot
16 and killed.

17 399. Plaintiff ERMA SMITH THOMPSON is an individual
18 residing in Montclair, California. Plaintiff is the sister of
19 Plaintiffs ROSIE LEE JACKSON, FRED SMITH, and FANNIE SMITH
20 VERNER. Plaintiffs are the children of Willis and Maggie Smith.
21 At the time of the Riot, Willis and Maggie Smith lived in the
22 Greenwood District of Tulsa.

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2 400. Plaintiff PANSY TILLEY is the widow of Delmar
3 Tilley. At the time of the Riot, Delmar Tilley lived in
4 Greenwood District of Tulsa.

5 401. Plaintiff CLIFTON JOE TIPTON is an individual
6 residing in Tulsa, Oklahoma. Plaintiff is the brother of
7 Plaintiff LEONA JERRY BRUNER ANTHONY. Plaintiff is the son of
8 Corinne Lillian Lucas Tipton Bruner. At the time of the Riot,
9 Corinne Lillian Lucas Tipton Bruner lived at 634 E. Jasper in
10 the Greenwood District of Tulsa. Her home was damaged when part
11 of it was burned in the Riot.

12 402. Plaintiff ROSEZELLA TURNER is the child of
13 Fannie Mae Bagby. Plaintiff is the sister of ERLINE CROSSLIN,
14 BILLIE WAYNE RUCKER, J. C. RUCKER, and ROBERT C. RUCKER. At the
15 time of the Riot, Fannie Mae Bagby lived in Greenwood District
16 of Tulsa.

17 403. Plaintiff SHIRLEY A. JOHNSON TYUS is an
18 individual residing in Conway, Arkansas. She is the sister of
19 JANICE LOU JOHNSON ROSS, MARILYN KAY JOHNSON COLEY, LENA MAE
20 JOHNSON PAYNE, and RONALD WAYNE JOHNSON. Plaintiffs are the
21 children of Bennie Lee Johnson, who resided in the Greenwood
22 District of Tulsa at the time of the Riot.

23 404. Plaintiff MAXINE JESSIE VADEN is an individual
24 residing in Tulsa, Oklahoma. Plaintiff is the sister of
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2 Plaintiff JOYCE RAMSEY. Plaintiffs are the daughters of Hosea
3 Vaden and Linda Agnetta Vaden. At the time of the Riot, Hosea
4 Vaden and Linda Agnetta Vaden lived in the Greenwood District of
5 Tulsa.

6 405. Plaintiff LORENZO CARLOS VANN is an individual
7 residing in Tulsa, Oklahoma. Plaintiff is a descendant of Vera
8 C. Marshall McGowen. At the time of the Riot, Vera C. Marshall
9 owned Poro Beauty College in the Greenwood District of Tulsa.
10 This property was destroyed by the rioting white mob.

11 406. Plaintiff ALICE BOYD VAUGHN is the grandchild of
12 Mr. and Mrs. Willie Staples and the children of Gertrude
13 Staples. At the time of the Tulsa Race Riot, their mother was
14 19 years old and lived with their grandparents in the Greenwood
15 District of Tulsa. The rioting white mob burned their home to
16 the ground.

17 407. Plaintiff FANNIE SMITH VERNER is an individual
18 residing in Tulsa, Oklahoma. Plaintiff is the sister of
19 Plaintiffs ROSIE LEE JACKSON, FRED SMITH, and ERMA SMITH
20 THOMPSON. Plaintiffs are the children of Willis and Maggie
21 Smith. At the time of the Riot, Willis and Maggie Smith lived
22 in the Greenwood District of Tulsa.

23 408. Plaintiff PAM VINCENT is an individual residing
24 in Oklahoma. Plaintiff is the sister of Plaintiffs ESCO
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2 PORTERFIELD and MARK PORTERFIELD and a descendant of Theodore
3 Porterfield. At the time of the Riot, Plaintiff's father
4 resided at 323 N. Frankfort Avenue in the Greenwood District.

5 409. Plaintiff MARIETTA ANDERSON WAITERS is the child
6 of Mary Franklin Anderson. Plaintiff is the sister of
7 Plaintiffs RHONDA ANDERSON, ROBERT EARL ANDERSON, DIANE ANDERSON
8 STEELE. At the time of the Riot, Ms. Anderson lived in the
9 Greenwood District of Tulsa.

10 410. Plaintiff DENETTE MARIA WALKER is an individual
11 residing in Tulsa, Oklahoma. Plaintiff is a descendant of Riley
12 Walker, Sr., and Imogene Walker. At the time of the Riot, Riley
13 Walker, Sr., and Imogene Walker resided at 423 E. Latimer Ct.,
14 in the Greenwood District of Tulsa.

15 411. Plaintiff FRANK WALKER, SR, an individual
16 residing in Inglewood, California. Plaintiff is a descendant of
17 Riley Walker, Sr., and Imogene Walker. At the time of the Riot,
18 Riley Walker, Sr., and Imogene Walker resided at 423 E. Latimer
19 Ct., in the Greenwood District of Tulsa.

20 412. Plaintiff HARRY DANIEL WALKER is an individual
21 residing in Fullerton California. Plaintiff is a descendant of
22 Riley Walker, Sr., and Imogene Walker. At the time of the Riot,
23 Riley Walker, Sr., and Imogene Walker resided at 423 E. Latimer
24 Ct., in the Greenwood District of Tulsa.

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2 413. Plaintiff HARRY LEON WALKER is an individual
3 residing in Richmond, California. Plaintiff is a descendant of
4 Riley Walker, Sr., and Imogene Walker. At the time of the Riot,
5 Riley Walker, Sr., and Imogene Walker resided at 423 E. Latimer
6 Ct., in the Greenwood District of Tulsa.

7 414. Plaintiff RILEY WALKER, JR residing in Oakland,
8 California. Plaintiff is a descendant of Riley Walker, Sr., and
9 Imogene Walker. At the time of the Riot, Riley Walker, Sr., and
10 Imogene Walker resided at 423 E. Latimer Ct., in the Greenwood
11 District of Tulsa.

12 415. Plaintiff WILLIAM D. WALKER is an individual
13 residing in Tulsa, Oklahoma. Plaintiff is a descendant of
14 Raphael Walker. At the time of the Riot, Raphael Walker lived
15 in the Greenwood District of Tulsa.

16 416. Plaintiff MARGE WALLACE is an individual
17 residing in Kansas. Plaintiff is the sister of LULA MAE
18 JEFFERSON, MARTHA MCGLORIE SWINDALL, MATTHEW JEFFERSON, ROBERT
19 JEFFERSON, VERNELL KELLEY and the descendant of the Reverend
20 A.L. and Lucinda McGlorie who resided in the Greenwood District
21 at the time of the Riot.

22 417. Plaintiff MAYBELLE WALLACE is an individual
23 residing in Tulsa, Oklahoma. Plaintiff is a descendant of Ed
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2 and Viola Wallace. At the time of the Riot, Ed and Viola
3 Wallace lived in Greenwood District of Tulsa.

4 418. Plaintiff MILDRED CANNON WALLACE is an
5 individual residing in Houston, Texas. Plaintiff is the sister
6 of Plaintiffs JOHNNYE CANNON LAWSON, NATHANIEL CANNON, and HENRY
7 CANNON. Plaintiffs are the sons and daughters Johnnye M.
8 Mitchell Cannon and grandchildren of Charles and Jessie
9 Mitchell. At the time of the Riot, Johnnye M. Mitchell Cannon,
10 Charles Cannon, and Jessie Mitchell lived in the Greenwood
11 District of Tulsa. Plaintiffs' mother and grandparents were
12 forced to flee Greenwood in order save their lives. Plaintiffs'
13 parents and grandparent's home was burned to the ground.

14 419. Plaintiff SYLVIA WARE is an individual residing
15 in California. Plaintiff is the sister of MILDRED WALLACE
16 HUDSPETH, PATRICIA DUKES BROME, ROBERT CHARLES DUKES and WILLIE
17 DUKES and a descendant of Robert and Mildred Wallace. At the
18 time of the Riot, Plaintiff's parents resided in the Greenwood
19 District and lost their home including all their savings.

20 420. Plaintiff OLENE WALKER WASHINGTON is an
21 individual residing in Tulsa, Oklahoma. Plaintiff is a
22 descendant of Raphael Walker. At the time of the Riot, Raphael
23 Walker lived in the Greenwood District of Tulsa.

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2 421. Plaintiff JIMMIE WICKAM is an individual
3 residing in McAlister, Oklahoma. Plaintiff is a descendant of
4 Dr. Charles Wickham. At the time of the Riot, Dr. Charles
5 Wickham lived across the street from Mount Zion Baptist Church
6 in the Greenwood District of Tulsa.

7 422. Plaintiff YVONNE WILEY-WEBB is an individual
8 residing in California. Plaintiff is the sister of Plaintiff
9 SAYYID JAMI and descendant of Ernest and Gladys Crooms, the
10 deceased descendants of Riot Survivor Mary Horn, Tulsa's first
11 African-American policewoman. At the time of the Riot, Mary
12 Horn lived on Archer Avenue in the area known as "The Hill."
13 Plaintiff's grandmother's home was burned to the ground and all
14 personal possessions were destroyed.

15 423. Plaintiff CHARLOTTE WILLIAMS is an individual
16 residing in Washington, D.C. Plaintiff is a descendant of
17 Orlando Williams, Sr. At the time of the Riot Orlando Willard
18 Williams, Sr., lived in the Greenwood District of Tulsa. His
19 home was burned down during the Riot. In his home was a hidden
20 trunk containing \$1000.00, which was also lost.

21 424. Plaintiff DAVID WILLIAMS is an individual
22 residing in Oklahoma. Plaintiff is a descendant of John and
23 Lula Williams. At the time of the Riot, Plaintiffs parents were
24 the owners of Lula's Confectionary, businesses located at the
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1
2 northwest corner of Greenwood and Archer avenues. The
3 businesses were in a three-story brick building and the third
4 floor of the building was rented to dentists, doctors and
5 lawyers. Plaintiff's parents also owned a two-story brick
6 structure further up Greenwood Avenue, which was a twenty-one
7 room boarding house and a garage. Plaintiff's parents also
8 converted this building to hold the first black theatre in Tulsa
9 called the Williams Dreamland Theatre.

10 425. Plaintiff FANNIE WILLIAMS is an individual
11 residing in Arlington, Texas. Plaintiff is the sister of
12 Plaintiff BOBBYE LOUISE GILBERT. Plaintiffs are children of
13 Joseph and Mamie Henderson. At the time of the Riot, Joseph
14 Henderson and Mamie Henderson lived in the Greenwood District of
15 Tulsa.

16 426. Plaintiff GRANT WILLIAMS is an individual
17 residing in University City, Missouri. Plaintiff is the
18 grandchild of Fisher James Williams and Dinah Freeman Williams.
19 At the time of the Riot, Fisher James Williams lived in the
20 Greenwood District of Tulsa, and was injured during the Riot.
21 Plaintiff's father died as a result of his injuries at St.
22 John's Hospital on June 21, 1921.

23 427. Plaintiff PATRICIA WILLIAMS is an individual
24 residing in Madison, Wisconsin. Plaintiff is the grandchild of
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2 Deltessa Starr Williams. At the time of the Riot, Deltessa
3 Starr Williams lived in the Greenwood District of Tulsa.

4 428. Plaintiff IDA LOUISE DENNIE WILLIS is the
5 grandchild of Howard and Ida Rodgers. At the time of the Riot,
6 Howard and Ida Rodgers lived in the 100 or 200 block of
7 Hartford Street in the Greenwood District of Tulsa. Plaintiff's
8 parents' home was seriously damaged during the Tulsa Race Riot.
9 Their uncle, George Dennie, Jr. was injured during the Tulsa
10 Race Riot and hospitalized.

11 429. Plaintiff ANNIE ALEXANDER WILSON is an
12 individual residing in Tulsa, Oklahoma. Plaintiff is a
13 descendant of Henry and Ora Tilley. At the time of the Riot,
14 Henry and Ora Tilley lived in Greenwood District of Tulsa.

15 430. Plaintiff BERTHA WILSON is the sister of
16 Plaintiffs MARY WILSON and ELIZABETH WILSON. Plaintiff is a
17 descendant of Dan Wilson, Violet Dixon Wilson, and Richard E.
18 Wilson. At the time of the Riot, Dan Wilson, Violet Dixon
19 Wilson, and Richard E. Wilson lived in the Greenwood District of
20 Tulsa. Dan Wilson, who came to Tulsa from Kingfisher, Oklahoma,
21 was captured during the Riot and disappeared.

22 431. Plaintiff BOBBIE WILSON is an individual
23 residing in Tulsa, Oklahoma. She is the sister of VAL GENE
24 JOHNSON, SR., MARY L. EMERSON, and VASSIE CLARK. Plaintiffs are
25

1
2 the children of Robert Franklin Johnson, who resided in the
3 Greenwood District of Tulsa at the time of the Riot.

4 432. Plaintiff ELIZABETH WILSON is the sister of
5 Plaintiffs BERTHA WILSON and MARY WILSON. Plaintiff is a
6 descendant of Dan Wilson, Violet Dixon Wilson, and Richard E.
7 Wilson. At the time of the Riot, Dan Wilson, Violet Dixon
8 Wilson, and Richard E. Wilson lived in the Greenwood District of
9 Tulsa. Dan Wilson, who came to Tulsa from Kingfisher, Oklahoma,
10 was captured during the Riot and disappeared.

11 433. Plaintiff MARY A. WILSON is an individual
12 residing at Englewood, Colorado. Plaintiff is a descendant of
13 Dan Wilson, Violet Dixon Wilson, and Richard E. Wilson. At the
14 time of the Riot, Dan Wilson, Violet Dixon Wilson, and Richard
15 E. Wilson lived in the Greenwood District of Tulsa. Dan Wilson,
16 who came to Tulsa from Kingfisher, Oklahoma, was captured during
17 the Riot and disappeared.

18 434. Plaintiff NAOMI NASH WILLIAMS WIMBERLY is an
19 individual residing in Tulsa, Oklahoma. Plaintiff is the
20 daughter of Mable Carter and granddaughter of Emma Hervey. At
21 the time of the Riot, Mable Carter Emma Hervey lived in the
22 Greenwood District of Tulsa. During the Riot, the Rioting white
23 mob burned Plaintiff's home to the ground.

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2 435. Plaintiff RAMONA DINKINS WIMBERLY is the
3 daughter of Grace Russell Ayers Wimberly. At the time of the
4 Riot, Grace Wimberly lived in the Greenwood district of Tulsa.
5 Ms. Wimberly's mother worked for a white woman and hid at her
6 place of work during the riot. Plaintiff's home was burned and
7 the family had to find another place to live.

8 436. Plaintiff EDNA EARLY WORKS is the grandchild of
9 Howard and Ida Rodgers. At the time of the Riot, Howard and Ida
10 Rodgers lived in the 100 or 200 block of Hartford Street in the
11 Greenwood District of Tulsa. Plaintiff's parents' home was
12 seriously damaged during the Tulsa Race Riot. Their uncle,
13 George Dennie, Jr. was injured during the Tulsa Race Riot and
14 hospitalized.

15 437. Plaintiff CHARLOTTE WRIGHT is an individual
16 residing in California. Plaintiff a descendant of Ernest and
17 Gladys Crooms, the deceased descendants of Riot Survivor Mary
18 Horn, Tulsa's first African-American policewoman. At the time
19 of the Riot, Mary Horn lived on Archer Avenue in the area known
20 as "The Hill." Plaintiff's grandmother's home was burned to the
21 ground and all personal possessions were destroyed.

22 438. As a direct consequence of the riot, the
23 descendant Plaintiffs named in paragraphs 165 to 437 suffered
24 the loss of real and/or personal property.

B. Defendants

439. THE STATE OF OKLAHOMA is named as a defendant.

440. Defendant THE CITY OF TULSA is a municipality located in the State of Oklahoma.

441. Defendant THE CHIEF OF POLICE OF THE CITY OF TULSA is an individual living in the State of Oklahoma, and is sued in his official capacity.

442. Defendant THE CITY OF TULSA POLICE DEPARTMENT is an entity located in the State of Oklahoma.

443. Plaintiffs are unaware of the true names and capacities of Defendants DOES 1 through 100, inclusive, and accordingly sue said Defendants by such fictitious names. As soon as Plaintiffs learn the true names and capacities of Defendants DOES 1 through 100, inclusive, it will amend this Complaint accordingly. Plaintiffs are informed and believe and therefore allege that Defendants DOES 1 through 100, inclusive, are in some way responsible for the acts and obligations sued upon herein. "THE STATE OF OKLAHOMA," "THE CITY OF TULSA," "THE CHIEF OF POLICE," "THE CITY OF TULSA POLICE DEPARTMENT," and DOES 1 through 100, inclusive, shall be referred to collectively herein as "Defendants."

FACTUAL BACKGROUND³⁶

A. Greenwood, 1921

444. The widespread atmosphere of racial hostility in Oklahoma in the years preceding the Riot was exacerbated by Tulsa whites' anger at the prosperity of the Greenwood District.³⁷

445. In the spring of 1921, Greenwood, the African American section of Tulsa, was one of the most vibrant African American communities in America. About 8,000 people lived in the largely self-sufficient community.³⁸

446. Greenwood's professional class had become so prosperous by 1921 that the streets on which it conducted its

³⁶ The factual references in the factual background are taken from the Commission Report and the documents published along with it; Scott Ellsworth, Death in a Promised Land: The Riot of 1921 (1982); Alfred Brophy, Reconstructing the Dreamland (2002); and the recollection of various Survivors of the Riot.

³⁷ See Scott Ellsworth, Death in a Promised Land: The Riot of 1921 (1982).

³⁸ Alfred Brophy, Reconstructing the Dreamland : The Tulsa Riot of 1921 (2002).

1
2 business were collectively known nationally as the "Negro Wall
3 Street."³⁹

4 447. Running north out of the downtown commercial
5 district—and shaped, more or less, like an elongated jigsaw
6 puzzle piece—Greenwood was bordered by the Frisco railroad yards
7 to the south, by Lansing Street and the Midland Valley tracks to
8 the east, and by Stand Pipe and Sunset Hills to the west.⁴⁰

9 448. The southern end of Greenwood Avenue, including
10 the adjacent side streets, was the home of the African American
11 commercial district. This several block stretch of handsome
12 one, two, and three-story red brick buildings housed dozens of
13 African American-owned and -operated businesses, including
14 grocery stores and meat markets, clothing and dry good stores,
15 billiard halls, beauty parlors and barber shops, as well as a
16 drug store, a jewelry store, an upholstery shop, and a
17 photography studio.

18 449. Greenwood's economy was diverse, consisting of
19 business persons and professionals as well as skilled and semi-
20

21 ³⁹ Scott Ellsworth, Death in a Promised Land: The Riot of 1921
22 (1982).

23 ⁴⁰ Dr. Scott Ellsworth, The Riot, published with the
24 Commission Report, 37, 40 (2001).
25

1
2 skilled workers. Because of racial segregation, these businesses
3 served primarily African Americans. It is estimated that
4 Greenwood had 33 professionals, including 2 dentists, 4
5 druggists, 1 jeweler, 3 lawyers, 2 photographers, 10 physicians,
6 and 6 real estate/insurance agents. It is estimated that by
7 1921 Greenwood boasted 108 business establishments, which
8 included 9 billiard halls, 2 retail stores, 4 confectioneries, 1
9 feed and grain store, 11 boarding houses, 2 garages, 41
10 groceries, 5 hotels, 30 restaurants, 2 movie theaters, and 1
11 undertaker's parlor. Greenwood's economy also consisted of an
12 estimated 24 skilled crafts persons, including 5 builders, 2
13 dressmakers, 1 plumber, 1 printer, 4 shoemakers, 10 tailors, and
14 1 upholsterer, plus an estimated 26 low-skilled workers, with 12
15 barbers, 5 cleaners, 3 hairdressers, and 6 shoeshiners.

16 450. There were two African American newspapers: the
17 Tulsa Star and the Oklahoma Sun. Moreover, Greenwood was also
18 home to a local business league, various fraternal orders, a
19 Y.M.C.A. branch, and a number of women's clubs.⁴¹

20 451. On a per capita basis, there were more churches
21 in Greenwood than there were in the city's white community as
22

23
24 ⁴¹ Dr. Scott Ellsworth, The Riot, published with the
25 Commission Report, 37, 39 (2001).

1
2 well as a number of Bible study groups, Christian youth
3 organizations, and chapters of national religious societies. All
4 told, there were more than a dozen African American churches in
5 Tulsa at the time of the Riot, including First Baptist, Vernon
6 A.M.E., Brown's Chapel, Morning Star, Bethel Seventh Day
7 Adventist, and Paradise Baptist, as well as Church of God,
8 Nazarene, and Church of God in Christ congregations. Mount Zion
9 Baptist Church was dedicated on April 10, 1921—less than eight
10 weeks before the Riot.

11 452. Greenwood was also home to other highly
12 successful business entrepreneurs, including two hotels: the
13 Gurley Hotel and the Stradford Hotel. The Stradford was a modern
14 fifty-four room structure, one of the largest African American-
15 owned businesses in Oklahoma.

16 453. Most of the African American-owned businesses in
17 Tulsa were much more modest. Scattered about the district were
18 numerous small stores, from two-seater barbershops to family-run
19 grocery stores, that helped to make pre-Riot Greenwood, on a per
20 capita basis, one of the most business-laden African American
21 communities in the country.

22 B. Prelude to the Riot

23 454. In the early evening of May 31, 1921, a crowd of
24 whites began gathering at the Tulsa County Courthouse, drawn
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2 there in part because of a newspaper story suggesting that a
3 nineteen year-old African American youth, Dick Rowland, had
4 assaulted a white elevator operator, seventeen-year-old Sarah
5 Page.

6 455. Sometime around 4:00 to 5:00 p.m., and certainly
7 by 6:30 p.m., rumors circulated in the Greenwood community that
8 Dick Rowland would be lynched that evening.

9 456. The previous August, a mob had taken a man out
10 of the cell where Rowland was being held, and lynched him.
11 Twenty-three African Americans had been lynched in the previous
12 decade.

13 457. Two prominent African Americans came to the
14 Courthouse to investigate the rumored lynching.

15 458. Sometime after 6:30 p.m., other African
16 Americans began to gather at the Courthouse. By about 7:00 p.m.
17 there were perhaps about 800 people of both races at the
18 Courthouse and tensions were running high. Some white people
19 were yelling to "Get these niggers away from here."

20 459. About this time, a number of whites went to the
21 National Guard armory seeking arms. At the same time, several
22 carloads of armed African Americans headed towards the
23 Courthouse to protect Dick Rowland from the gathering white mob.
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2 460. According to J.B. Stradford, an African American
3 businessman, Sheriff McCulloch stated that he could "handle" the
4 crowd and that he did not require assistance from the African
5 American residents of the town. He did not turn away, however,
6 a growing number of white men who continued to mob the
7 Courthouse, many of them having returned drunk from the armory.

8 461. A white man then made a speech in front of the
9 Courthouse and advised the crowd to go home, stating that
10 African Americans were riding around with high-powered revolvers
11 and guns downtown. The speech had some effect and the crowd
12 started to disperse.

13 462. At the Courthouse, a white man confronted some
14 of the African American men and began disarming them. One man
15 refused to give up his gun to the white man. The white man
16 asked, "Nigger, where you goin' with that gun?" A struggle
17 resulted, the gun went off, police officers and white men
18 started firing on the African Americans, an African American man
19 was killed, and the Riot started.⁴² Sheriff McCullough testified
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21
22 ⁴² See Scott Ellsworth, Death in a Promised Land: The Riot of
23 1921 (1982). See also Guardsmen With Machine Guns Ready for Any
24 Emergency, St. Louis Post-Dispatch 2 (June 1, 1921) ("One
25 version of the beginning of the trouble says the first firing
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1
2 that when the shot was fired, "that was just like throwing a
3 match in the powder can."⁴³ The street cleared quickly.

4 C. The Riot Starts: All Hell Breaks Loose

5 463. According to O.W. Gurley, a prominent African
6 American businessman, at that point "all hell broke loose."

7 464. As the streets cleared, the African American
8 victim of the shooting lay in front of the Courthouse. Walter
9 White, associate secretary of the NAACP, who came to Tulsa
10 immediately after the Riot to investigate it, reported that the
11 African American victim lay dying, under a billboard with a
12 picture of Mary Pickford, America's sweetheart, smiling
13 winsomely.⁴⁴

14
15 came shortly after dark, when a negro was stopped by an officer
16 and his gun taken away. He attempted to resist, according to
17 the officer, and was shot dead. Three hours later his body was
18 picked up from the street and taken to Police Headquarters,
19 which was used as a temporary morgue.").

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21 ⁴³ Stradford v. American Central Ins. Co, Superior Court of
22 Cook County, Illinois, No. 370,274 (1921), McCullough Deposition
23 at 19.

24 ⁴⁴ See F.W. Prentice, Oklahoma Race Riot, 90 Scribner's 151,
25 152 (August 1931).

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2 465. Almost immediately, members of the white mob
3 opened fire on the African American men, who defended themselves
4 by firing back. Outnumbered more than twenty to one, the
5 African American men fought in retreat towards the Greenwood
6 District.

7 466. With armed whites in close pursuit, the African
8 American men came under heavy gunfire along Fourth Street, two
9 blocks north of the Courthouse.

10 467. A short while later, a second, deadlier,
11 skirmish broke out at the corner of Second and Cincinnati
12 Streets. A second contingent of African American men came under
13 fire from the rioting white mob and had to fight for their
14 lives.

15 468. Heavily outnumbered by the whites, and suffering
16 casualties, most of the African Americans were able, however, to
17 make it safely across the Frisco railroad tracks and into
18 Greenwood.

19 469. By 10:00 p.m. the police station was filled with
20 a mob of armed whites. Groups of these white men left the
21 police station in squads and returned sometime later.

22 470. The white Police Chief John A. Gustafson,
23 deputized between 250 and 500 white men. The police issued guns
24 to the newly deputized white citizens of Tulsa to put down what
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2 they referred to as a "Negro uprising," but failed to even
3 record the names of the people to whom they gave the guns.
4 After the Riot, Police Chief Gustafson pleaded in the pages of a
5 white Tulsa newspaper for the return of guns, stating they were
6 issued with the understanding that they would be returned when
7 the need for them passed.

8 471. The police department commandeered the gun shops
9 and the pawnshops and issued guns to the newly deputized white
10 mob that then made its way towards Greenwood. The police
11 department also ordered deputies and non-deputies alike to "go
12 home, get a gun, and get a nigger."⁴⁵

13 472. Local officials sought the assistance of the
14 State National Guard.

15 473. A State National Guard commander arrived with
16 two officers and sixteen men at approximately 10:30 p.m. They
17 went to the police station, where they began working in
18 conjunction with the police.

19 474. Binkley Wright, who was seventeen at the time of
20 the Riot, was an eyewitness to the events.

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24 ⁴⁵ Dr. Scott Ellsworth, *The Riot*, published with the
25 Commission Report, 37, 64 (2001).

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2 475. According to one Survivor, Binkley Wright,
3 African Americans formed a "protective brigade" at Mt. Zion
4 Baptist Church, helping to fight off the rioting white mob,
5 which included newly deputized members of the police department,
6 entering Greenwood.

7 476. Binkley Wright saw many African Americans killed
8 when the white mob, including newly deputized members of the
9 police department and men in military uniform, broke through and
10 heavily attacked the Church.

11 477. Throughout the night of May 31, 1921 to June 1,
12 1921, the white mob, including men newly deputized by the police
13 department, came across the Frisco railroad into Greenwood.
14 Although outnumbered, the African American residents fought to
15 keep them out, but the whites forced their way into Greenwood,
16 shooting, wounding, and killing many African Americans, and
17 burning down everything in their path.

18 478. State National Guardsmen fired upon a number of
19 African American Greenwood residents in the process of
20 responding to the "Negro uprising." Some time after 11:00 p.m.,
21 twenty Guardsmen arrived at the police station, where they had
22 set up headquarters. They guarded the border between white
23 Tulsa and the African American Greenwood District for several
24 hours.

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2 479. Some African Americans attempted to organize an
3 effort to defend themselves against the oncoming mob, which
4 included newly deputized members of the police department, on
5 Brickyard Hill between Haskell and Jasper Streets.

6 480. Between the hours of 1:00 a.m. and 2:00 a.m.,
7 J.B.A. Robertson, the Governor of Oklahoma, declared martial law
8 throughout Tulsa County, and ordered the troops to suppress the
9 "Negro Uprising."⁴⁶

10 481. The Guard, which had been instructed by the
11 State to restore order, joined the rioters on some occasions
12 instead, acting "like wild men."⁴⁷

13 482. At 1:15 a.m. some white Guardsmen placed a
14 machine gun on a truck, along with three experienced white
15 machine gunners and six other white enlisted men. They traveled
16 around the city putting down African American efforts to defend
17 themselves from the white mob. At 3:00 a.m., Guardsmen were
18 ordered to Stand Pipe Hill. Their commander deployed the
19 Guardsmen along Detroit Avenue, from Stand Pipe Hill to Archer
20 Street, on the west side of Greenwood. They began a bridgehead
21 into Greenwood, using a truck with a machine gun mounted upon
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23 ⁴⁶ Id. at 12-13.

24 ⁴⁷ Prologue to Commission Report at viii.
25

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2 it, and entered the town, disarming and placing African American
3 men in "protective custody" and sending them to the Convention
4 Hall by police cars and trucks.

5 483. African Americans at Paradise Baptist Church
6 told one survivor, Binkley Wright, that the mayor of the CITY OF
7 TULSA had opened the Armory and given two machine guns to whites
8 and that whites "were using those machine guns to mow down our
9 people."⁴⁸

10 484. Binkley Wright was then asked by some of the
11 African American men to aid in the defense of Greenwood, loading
12 and reloading guns behind the steps of Paradise Baptist Church
13 for the human chain of African American defenders.

14 485. Later, these African Americans moved on to Stand
15 Pipe Hill to defend the people of North Tulsa who were under
16 attack. Led by "Peg-Leg" Taylor, these African Americans met
17 and "conferenced" behind the steps of Paradise Baptist Church.
18 Then they made a human chain and went up the hill to defend
19 African Americans from the white mob.

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23 ⁴⁸ Testimony of Binkley Wright published by the Tulsa
24 Reparations Coalition on their web page at
25 <http://www.tulsareparations.org/>.

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2 486. The white mob, including recently deputized
3 members of the police department and uniformed members of the
4 National Guard, were firing machine guns.

5 487. This white mob, containing newly deputized
6 members of the police department, and Guardsmen outnumbered and
7 shot the African American men stationed at Paradise Baptist
8 Church.

9 488. Plaintiff KINNY BOOKER witnessed bullets raining
10 down upon him, either from an airplane or Stand Pipe Hill, while
11 he hid in the upper floors of his home.

12 489. On June 1, 1921, there were only two planes in
13 Tulsa. One was a government-owned plane. The government may
14 have commandeered other planes.⁴⁹

15 490. At Sunset Hill, located on the northwest side of
16 Greenwood, the Guardsmen advanced on the African Americans
17 living there and fired at will for nearly half an hour. Before
18 advancing on Greenwood, they shot the African American men,
19 women, and children who hid behind barricades to defend their
20 homes. The guardsmen also attacked African Americans barricaded
21 in a concrete store in the northeast corner of Greenwood. The

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24 ⁴⁹ Richard Warner, Airplanes and the Riot, published with the
25 Commission Report, 103, 104 (2001).

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2 Guardsmen fought along side white civilians, including those who
3 had been newly deputized by the police department, killing
4 African Americans.

5 491. At some point during the Riot, the Chief of
6 Police informed a prominent African American businessman that if
7 the African American residents ceased their resistance to the
8 white mob, they would be "treated fairly" the next day.

9 492. At 5:00 a.m., in the morning of June 1, 1921, a
10 whistle blew as a signal to the white mob, containing
11 individuals newly deputized by the police department, and the
12 National Guard, to enter Greenwood.

13 493. As soon as the African American residents
14 stopped defending themselves, however, the Chief of Police
15 contacted nearby cities and towns for reinforcements. By 9:00
16 a.m. the next day, Guardsmen had arrived from Muskogee, Oklahoma
17 City, and Wagoner.⁵⁰

18 494. The Guardsmen worked in close conjunction with
19 the Tulsa police. The police and Guardsmen placed a large number
20 of Greenwood residents in "protective custody," a euphemism for
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23 ⁵⁰ See 85 Whites and Negroes Die in Tulsa Riots as 3,000 Armed
24 Men Battle in Streets, 30 Blocks Burned, Military Rule in City,
25 N.Y. Times, June 2, 1921, at 2.

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2 illegal imprisonment, and turned them over to the police cars
3 that stood close by.

4 495. Defendants instructed the Guard to take the
5 African American residents of Greenwood into "protective
6 custody."⁵¹ The majority of the city's African American men,
7 women, and children had either fled to the countryside or were
8 held — allegedly for their own protection — against their will
9 in one of a handful of hastily set-up internment centers,
10 including Convention Hall, the Fairgrounds, and McNulty Baseball
11 Park.

12 496. Plaintiff KINNY BOOKER was removed from his home
13 some time after martial law was declared. Even though Plaintiff
14 KINNY BOOKER and his sister and three brothers hid in the attic,
15 and despite the pleas of his father, the rioting white mob set
16 his home on fire. His family was able to get out without injury
17 despite coming under small arms fire.

18 497. Plaintiff KINNY BOOKER's family was transported
19 by the National Guard to the Convention Hall.

20 498. As the Guardsmen were advancing, the white mob
21 accompanying them, and including individuals newly deputized by
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24 ⁵¹ See Scott Ellsworth, Death in a Promised Land: The Riot of
25 1921 61 (1982).

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2 the white police department, set fires all over Greenwood. As
3 the Guardsmen swept through Greenwood disarming and placing the
4 residents in "protective custody," the white mob followed
5 closely after setting fire to the buildings.

6 499. Brigadier General Charles F. Barrett, who was in
7 charge of the National Guard brigade, stated that, on the
8 morning of June 1, 1921, he witnessed a rioting white mob of
9 15,000 to 20,000 in Greenwood, which was by now on fire. The
10 National Guard marched through the crowded streets. Trucks
11 loaded with scared and partially clothed African American men,
12 women, and children were parading the streets under heavily
13 armed guards.

14 500. "Personal belongings and household goods had
15 been removed from many homes and piled in the streets. On the
16 steps of the few houses that remained sat feeble and gray Negro
17 men and women and occasionally a small child. The look in their
18 eyes was one of dejection and supplication. Judging from their
19 attitude, it was not of material consequence to them whether
20 they lived or died. Harmless themselves, they apparently could
21 not conceive the brutality and fiendishness of men who would
22 deliberately set fire to the homes of their friends and
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2 neighbors and just as deliberately shoot them down in their
3 tracks."⁵²

4 501. Brigadier General Barrett wrote that "In all my
5 experience, I have never witnessed such scenes that prevailed in
6 this city when I arrived at the height of the rioting — 25,000
7 whites, armed to the teeth were ranging the city in utter and
8 ruthless defiance of every concept of law and righteousness.
9 Motorcars bristling with guns swept through your city, their
10 occupants firing at will."⁵³

11 502. Maurice Willows, the Director of the local Red
12 Cross, stated that "all that fire, rifles, revolvers, machine
13 guns, and inhuman bestiality could be done with 35 city blocks
14 with its 10,000 Negro population, was done."⁵⁴

15 503. The Guardsmen facilitated the destruction of
16 Greenwood. They removed African American residents against
17 their will. Many of these residents believed that, if the
18 Guardsmen would only help them, they were capable of defending
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21 ⁵² Tulsa Daily World, June 2, 1921 (cited in Prologue to
22 Commission Report at iv).

23 ⁵³ Charles F. Barrett, Oklahoma After Fifty Years: A History
24 of the Sooner State and Its People, 1889-1939 (1941).

25 ⁵⁴ Id.

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2 themselves and their property from the depredations of the white
3 mob, which included individuals newly deputized by the police
4 department. Instead, the Guard worked at the Defendants'
5 direction to place African American Greenwood residents in
6 "protective custody" instead of protecting Greenwood property.

7 504. All firing had ceased by 11:00 a.m., not because
8 the Guard had succeeded in bringing the white rioters under
9 control but rather because the African American Greenwood
10 residents had been killed, placed in "protective custody," or
11 driven out.⁵⁵ Even after the Riot ceased, the newly deputized
12 white citizens were told that they were to "go out and shoot any
13 nigger you see and the law'll be behind you."⁵⁶

14 505. As many as 300 African Americans were killed.⁵⁷

15 506. Forty-two square blocks of property was laid
16 waste in ashes and 8,000-10,000 African Americans were rendered
17 homeless.⁵⁸

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20 ⁵⁵ Alfred Brophy, Reconstructing the Dreamland : The Tulsa
21 Riot of 1921 (2002).

22 ⁵⁶ R. Halliburton, Jr., The Tulsa Race War of 1921 10 (1975).

23 ⁵⁷ Commission Report at 12-13.

24 ⁵⁸ Charles F. Barrett, Oklahoma After Fifty Years: A History
25 of the Sooner State and Its People, 1889-1939 (1941).

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2 507. Defendant the CITY OF TULSA held many of the
3 African American men, women, and children in custody against
4 their will for days after the Riot. The police and National
5 Guard were used as guards in the various camps to ensure the
6 African Americans remained in custody. Defendants THE STATE OF
7 OKLAHOMA and the CITY OF TULSA forced African Americans to work
8 their way out of custody by cleaning up the destruction caused
9 by the white rioters. At some time on June 2, General Barrett
10 issued Field Order Number 4, which decreed that "all able bodied
11 [N]egro men remaining in detention camp at the Fairgrounds and
12 other places in the City of Tulsa [would] be required to render
13 such service and perform such labor as [was] required by the
14 military commission."⁵⁹ The African American Greenwood residents
15 were treated like chattel and, in treatment reminiscent of
16 slavery, were often only released when their white employer
17 vouched for them. Those released wore green tags to identify
18 that they had been properly released from custody.

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22 ⁵⁹ Gerald Jerome Smith, Note: Constitutionality Of States' Use
23 Of Police And Military Force to Arrest, Detain, And Confine
24 American Citizens Because Of Race, 27 Okla. City U. L. Rev. 451
25 454-55 (2002).

D. Defendants' Policy and Custom
of Racial Discrimination

505. The Defendants engaged in a longstanding and official policy, practice, custom, habit and usage to deny African Americans their equal rights under the law. This was done in numerous ways, described below.

506. Defendants created and condoned a climate of racial hatred that presented a clear and present danger, led to actual tragedy, and contributed to the environment of racially motivated suppression. This climate of racial hatred also operated to prevent the victims from obtaining redress and from rebuilding their community.

507. Tulsa newspapers contributed to the climate of racial hatred. For example, the Tulsa Tribune called Greenwood "Niggertown" and published a front-page article suggesting that a nineteen year-old African American youth, Dick Rowland, had assaulted a white elevator operator, seventeen-year-old Sarah Page. Witnesses recollect an editorial headlined "To Lynch Negro Tonight."⁶⁰ These publications served as an incitement to riot.

⁶⁰ Dr. Scott Ellsworth, The Riot, published with the Commission Report, 58-59 (2001).

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2 508. Defendants permitted Plaintiffs to be physically
3 attacked, aided and abetted the attacks, encouraged and condoned
4 the attacks and even participated in some of the attacks,
5 resulting in bodily injury, death and destruction and theft of
6 property. Defendants, with deliberate indifference and on the
7 basis of race, failed to protect Plaintiffs from repeated
8 criminal acts, failed to equally enforce the laws and branded
9 Plaintiffs with the racial badges of inferiority and slavery in
10 the form of racially motivated violence. Defendants' failure to
11 prevent or aid in preventing the commission of racial crimes
12 exacerbated the Riot and led to further wrongs against
13 Plaintiffs.

14 509. Defendants negligently endangered plaintiffs by
15 deputizing and issuing ammunition and guns to persons they knew
16 or should have known posed a danger to the African American
17 community of Greenwood.

18 510. Defendants placed Plaintiffs and the African
19 American community of Greenwood at an unjustifiably high risk of
20 harm.

21 511. Defendants failed to adequately train and
22 supervise those persons it deputized and those persons to whom
23 it issued ammunition during the Riot.

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2 512. Defendants' deliberate policy and practice was
3 designed to drive Plaintiffs out of Greenwood or intimidate
4 Plaintiffs such that the Greenwood community was devastated
5 physically and economically.

6 513. Defendants failed to meaningfully investigate
7 and act upon complaints filed by Plaintiffs on the basis of
8 race. Defendants routinely under-investigated, under-responded,
9 undercharged, mishandled and failed to protect Plaintiffs from a
10 series of criminal acts or prosecute those responsible for such
11 acts. Defendants abdicated their responsibility to investigate,
12 develop and charge white citizens with crimes against
13 Plaintiffs, thereby ratifying and jointly participating in
14 racially motivated acts to deprive Plaintiffs of their
15 constitutional and statutory rights. Defendants made decisions
16 on a racially discriminatory basis.

17 514. Defendants conspired together and acted in
18 concert with one another throughout and after the Riot.

19 515. Defendants failed to make restitution and
20 reparations it promised Plaintiffs and interfered with
21 Plaintiffs efforts to rebuild their community.

22 516. All of Defendants' actions and inaction, as
23 alleged in the Complaint, were pursuant to Defendants' policy,
24 custom, habit, usage and pattern and practice of unequal
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2 enforcement of the law depriving Plaintiffs of their Fourteenth
3 Amendment constitutional rights and statutory rights.

4 Defendants did not treat white citizens in the same or similar
5 manner as Plaintiffs.

6 517. As a direct and proximate result of Defendants'
7 unconstitutional and illegal racially motivated actions,
8 Plaintiffs have suffered the loss of their property, physical
9 injury, and emotional distress from witnessing the murder and
10 injury of their family members.

11 E. Findings of The Oklahoma Commission to
12 Study the Riot of 1921

13 518. The 1921 Riot Commission was created pursuant to
14 House Joint Resolution No. 1035. The statute, as amended,
15 charged the commission to:

16 "undertake a study to develop a historical record of
17 the 1921 Riot including the identification of persons
18 who:

18 1. Can provide adequate proof to the Commission that
19 the person was an actual resident of the Greenwood
20 area or community of the City of Tulsa on or about May
21 31, 1921, or June 1, 1921; or

22 2. Can demonstrate to the satisfaction of the
23 members of the Commission that the person sustained an
24 identifiable loss to their person, personal relations,
25 real property, personal property or other loss as a
26 result of tortious or criminal conduct, whether or not
the conduct was ever adjudicated, occurring during the
period beginning on or about May 31, 1921, and ending
not later than June 30, 1921, resulting from the

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2 activity commonly described as the 1921 Riot."⁶¹

3 519. The Statute also required that the Commission
4 produce, by February 28, 2001, "a final report of its findings
5 and recommendations" and to submit that report "in writing to
6 the Governor, the Speaker of the House of Representatives, the
7 President Pro Tempore of the Senate, and the Mayor and each
8 member of the City Council of the City of Tulsa, Oklahoma."

9 520. Most importantly, under the terms of the statute:
10 "The Report may contain specific recommendations
11 regarding whether or not reparations can or should be
12 made and the appropriate methods to achieve the
13 recommendations made in the final report."⁶²

13 521. After four years of intense study, the
14 Commission generated a comprehensive study that examined more
15 than 20,000 pages on the Riot.⁶³ The final Commission Report did
16 contain a recommendation that reparations should be made and
17 detailed the manner in which Defendants THE STATE OF OKLAHOMA
18 and the CITY OF TULSA make reparations.⁶⁴

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21 ⁶¹ 74 Okl. St. Ann. §8201 (West 2000).

22 ⁶² Id. (emphasis added).

23 ⁶³ Id. at 8.

24 ⁶⁴ Commission Report at 20: "Reparations are the right thing
25 to do."

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2 522. A number of documents were attached to the
3 Commission Report, providing support for each of the
4 Commission's findings concerning the causes and consequences of
5 the Riot, the Defendants' participation in and responsibility
6 for the Riot, and Defendants THE STATE OF OKLAHOMA's and the
7 CITY OF TULSA's moral and legal liability to pay restitution to
8 the African American survivors of the Riot and their
9 descendants.

10 523. The findings were published in the Commission
11 Report and incorporated by statute.⁶⁵

12 524. The findings include determinations that: the
13 "root causes" of the Riot stemmed from a history racism and
14 violence in both Tulsa and Oklahoma;⁶⁶ the action or inaction of
15 "local municipal and county officials" enabled a white mob, that
16 included state and local officials, to kill 100-300 African
17 Americans, loot and burn 1,256 African American residences and
18 businesses in Greenwood;⁶⁷ and that the property lost should be
19 valued at "approximately \$2 million in 1921 dollars or
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22 ⁶⁵ See 74 Okl. St. Ann. §8000.1 (West 2002).

23 ⁶⁶ 74 Okl. St. Ann. §8000.1.1 (West 2002).

24 ⁶⁷ Id. at §8000.1.2.

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\$16,752,600 in 1999 dollars."⁶⁸ The Oklahoma State Legislature further concluded that there had been no convictions or payments of any kind to the African American victims of the Riot, and that "local officials attempted to block the rebuilding of the Greenwood";⁶⁹ and that the Defendants ignored their "moral responsibilities at the time of the riot [and have continued to do so] ever since rather than confront the realities of an Oklahoma history of race relations that allowed one race to 'put down' another race."⁷⁰

525. The Commission Report, which was endorsed by the State of Oklahoma's legislature, made the following additional findings and recommendations:

a. "As hostile groups gathered and their confrontation worsened, municipal and county authorities failed to take actions to calm or contain the situation."⁷¹

b. "At the eruption of violence, civil officials selected many men, all of them white and some

⁶⁸ Id. at §8000.1.3.

⁶⁹ Id.

⁷⁰ Id. at §8000.1.6.

⁷¹ Commission Report at 11.

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2 of them participants in that violence, and made
3 those men their agents as deputies."⁷²

4 c. "In that capacity, deputies did not stem the
5 violence but added to it, often through overt
6 acts themselves illegal."⁷³

7 d. "Public officials provided firearms and
8 ammunition to individuals, again all of them
9 white."⁷⁴

10 e. "Units of the Oklahoma National Guard
11 participated in the mass arrests of all or
12 nearly all of Greenwood's residents, removed
13 them to other parts of the city, and detained
14 them in holding centers."⁷⁵

15 f. "Entering the Greenwood District, [White]
16 people stole, damaged or destroyed personal
17 property left behind in homes and businesses."⁷⁶

20 ⁷² Id.

21 ⁷³ Id.

22 ⁷⁴ Id.

23 ⁷⁵ Id. at 12.

24 ⁷⁶ Id.

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2 g. "[White p]eople, some of them agents of
3 government, also deliberately burned or
4 otherwise destroyed homes credibly estimated to
5 have numbered 1,256, along with virtually every
6 other structure—including churches, schools,
7 businesses, even a hospital and library—in the
8 Greenwood district."⁷⁷

9
10 h. "Despite duties to preserve order and to
11 protect property, no government at any level
12 offered adequate resistance, if any at all, to
13 what amounted to the destruction of the
14 neighborhood referred to commonly as 'Little
15 Africa' and politely as the 'Negro quarter.'"⁷⁸

16 i. "[C]redible evidence makes it probable that
17 many people, likely numbering between one and
18 three hundred, were killed during the riot."⁷⁹

19 j. "Not one of these criminal acts was then or
20 ever has been prosecuted or punished by
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22 ⁷⁷ Id.

23 ⁷⁸ Id.

24 ⁷⁹ Id. at 13.
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2 government at any level, municipal, county,
3 state, or federal."⁸⁰

4 k. "Even after the restoration of order it was
5 official policy to release a African American
6 detainee only upon the application of a white
7 person, and then only if that white person
8 agreed to accept responsibility for that
9 detainee's subsequent behavior."⁸¹

10 l. "[N]either [city and county government]
11 contributed substantially to Greenwood's
12 rebuilding; in fact, municipal authorities
13 acted initially to impede rebuilding."⁸²

14 m. "In the end, the restoration of Greenwood after
15 its systematic destruction was left to the
16 victims of that destruction."⁸³

17 2. According to the Report of the Oklahoma
18 Commission to Study the Riot of 1921, an accurate assessment of
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20 ⁸⁰ Id.

21 ⁸¹ Id.

22 ⁸² Id. at 14.

23 ⁸³ Larry O'Dell, Riot Property Loss, published with the
24 Commission Report, 143, 149 (2001).
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2 the value of the property, destroyed by the rioters, totals at
3 least \$16,752,600 in 1999 dollars.⁸⁴
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5 F. Statute of Limitations Should Be
6 Equitably Tolled and Waived

7 526. Because of the work of the Commission, there
8 exists today a tremendous amount of information that was not
9 available in 1921 about the Tulsa Riot, Defendants' culpability,
10 and the implications of such culpability on the legal redress
11 available to the Plaintiffs. Defendants acted, both in 1921 and
12 subsequently, to hide evidence of their culpability and to
13 prevent African American victims of the Riot and their
14 descendants from bringing suit against Defendants. Furthermore,
15 the STATE OF OKLAHOMA, in its statute creating the Commission,
16 waived the statute of limitations as an affirmative defense.
17 Thus, the applicable statute of limitations is subject to
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19 ⁸⁴ Scholarly studies of the race riot are in substantial
20 agreement with the Commission's assessment. See, e.g., Alfred
21 Brophy, *Reconstructing the Dreamland : The Tulsa Riot of 1921*
22 (2002); Roy L. Brooks, *Integration or Separation?* (1996), Ch.
23 17; Randall Kennedy, Foreword in Alfred Brophy, *Reconstructing*
24 *the Dreamland : The Tulsa Riot of 1921* (2002).
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2 equitable tolling or, in the alternative, to waiver, implicitly
3 or explicitly, by the STATE OF OKLAHOMA.

4 527. Defendants, acting new their official capacities,
5 misrepresented and concealed information about their role in the
6 Riot. Defendants have knowingly perpetuated confusion and
7 misinformation or failed to provide information about the
8 factual circumstances underlying the Riot. As a result of
9 Defendants' fraudulent concealment, Plaintiffs have been unable,
10 even with reasonable diligence, to discover the underlying facts
11 and evidence to successfully bring a cause of action.

12 Consequently, Defendants are precluded by their own acts and
13 omissions from asserting the statute of limitations as a
14 defense. Under the doctrine of unclean hands, Defendants are
15 estopped from claiming this affirmative defense.

16 528. The STATE OF OKLAHOMA created the Commission in
17 large part precisely to discover hidden or suppressed facts
18 surrounding the Riot that could not otherwise have been
19 discovered by Plaintiffs. The Commission Report revealed
20 information never before made available to the public. The
21 Commission described the Commission Report as a "tower of new
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2 knowledge" that enabled "visions never seen before."⁸⁵

3 Specifically, the Commission stated that the Commission Report:

4 "[i]ncluded . . . records and papers long presumed
5 lost, if their existence had been known at all. Some
6 were official documents, pulled together and packed
7 away, years earlier. Uncovered and examined, they
8 took the commission back in time, back to the years
9 just before and just after 1921. Some were musty
10 legal records saved from the shredders. Briefs filed,
11 dockets set, lawsuits decided—each opened an avenue
12 into another corner of history. Pages after pages
13 laid [sic] open the city commission's deliberations
14 and decisions as they affected the Greenwood area.
15 Overlooked records from the National Guard offered
16 overlooked perspectives and illuminated them with
17 misplaced correspondence, lost after-action reports,
18 obscure field manuals, and self-typed accounts from
19 men who were on duty at the riot."⁸⁶

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21 529. A significant amount of previously unavailable
22 evidence—including long-forgotten documents and photographs—
23 has been discovered.

24
25 530. Not until now has the story of the Tulsa Riot
26 been told fully and truthfully. The Report of the Oklahoma
Commission to Study the Riot of 1921, stated that: "Much of the
evidence used in preparing the report was recently discovered.":

"Before there was this commission, much was known
about the Riot. More was unknown. It was buried
somewhere, lost somewhere, or somewhere undiscovered.
No longer. Old records have been reopened, missing
files have been recovered, new sources have been

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24 ⁸⁵ Commission Report at 8.

25 ⁸⁶ Id. at 4.

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2 found."⁸⁷

3 531. The Commission Report breaks the "conspiracy of
4 silence" that has existed for over a half century and for the
5 first time "this past tragedy has been extensively aired."⁸⁸

6 "Until recently, the Riot has been the most important
7 least known event in the state's entire history. Even
8 the most resourceful of scholars stumbled as they
9 neared it for it was dimly lit by evidence and the
evidentiary record faded more with every passing
year."⁸⁹

10 532. However, the history of the Riot "may now
11 comprise the most thoroughly documented moments ever to have
12 occurred in Oklahoma."⁹⁰ The Commission itself acknowledged
13 surprise over the amount of "new evidence" and that it
14 "contributed so much."⁹¹ Even the book Death in a Promised Land;
15 the Riot of 1921, written by Scott Ellsworth (the acknowledged
16 expert on the Riot) and published in 1982, did not have the
17 evidence contained in the Commission Report.⁹²

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20 ⁸⁷ Id. at 8.

21 ⁸⁸ Id.

22 ⁸⁹ Id. at 6.

23 ⁹⁰ Id.

24 ⁹¹ Id. at 7.

25 ⁹² Id. at 8 ("no one had it").

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2 533. Only now do Plaintiffs have sufficient
3 information to state the nature of the causes of action they can
4 bring and against whom. Prior to the Commission's Report, the
5 Defendants concluded that the Riot was "something to be swept
6 well beneath the history's carpet."⁹³ Plaintiffs made repeated
7 requests for information that was denied to them by Defendants,
8 which prevented them from being able to pursue legal action.
9 Not until the Commission published its Commission Report were
10 Plaintiffs provided with the information needed to bring suit.

11 534. Thus, Plaintiffs are excused from the time limits
12 on filing, and the statute of limitations should be equitably
13 tolled insofar as much of the information upon which this
14 lawsuit rests was only discovered by the efforts of the Oklahoma
15 Commission to Study the Riot of 1921.

16 535. Defendants also erected barriers making it
17 extremely difficult, if not impossible, for Plaintiffs to seek
18 legal redress for injuries resulting from the Riot. The
19 atmosphere surrounding Tulsa in the wake of the Riot made
20 conditions potentially deadly for individuals who wanted to seek
21 restitution through the courts. Such barriers included:

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24 _____
25 ⁹³ 74 Okl. St. Ann. §8000.1.4.

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2 a. The Grand Jury convened by the State of
3 Oklahoma returned indictments against African
4 Americans for inciting the Riot. Because of the
5 discriminatory manner in which the indictments
6 were returned, African American residents of
7 Greenwood were prevented or inhibited from
8 filing or continuing lawsuits on behalf of the
9 African American residents of Greenwood. In an
10 absurdly biased grand jury report, which was
11 orchestrated by the Oklahoma attorney general,
12 Tulsa blamed the African American community for
13 the Riot, further prejudicing the claims of
14 Riot victims in the courts. Tulsa prosecutors
15 threatened to imprison key Greenwood leaders,
16 like A.J. Smitherman, editor of the Tulsa Star,
17 and J.B. Stradford, which caused them to flee
18 Oklahoma. Stradford filed suit in Chicago, but
19 could not adequately prosecute his claim, for
20 fear of imprisonment and bodily harm.
21 Stradford never set foot in Oklahoma again.

22 b. The court system was corrupted with the
23 pernicious influence of the Ku Klux Klan,
24 thereby resulting in a racially discriminatory
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2 judicial system. In fact, about one year after
3 the Riot, Oklahoma's Governor declared martial
4 law in Tulsa, citing among other reasons the
5 pervasive control of the courts by the Ku Klux
6 Klan.⁹⁴ According to the Commission Report:
7 "Everyone (on the Commission) agrees that
8 within months of the riot Tulsa's Klan chapter
9 had become one of the nation's largest and most
10 powerful, able to dictate its will with the
11 ballot as well as the whip. Everyone agrees
12 that many of the city's most prominent men were
13 Klansmen in the early 1920's and that some
14 remained Klansmen throughout the decade.
15 Everyone agrees that Tulsa's atmosphere reeked
16 with a Klan-like stench that oozed through the
17 robes of the Hooded Order."

18 c. The Oklahoma Supreme Court discouraged lawsuits
19 by limiting municipal liability on the basis of
20 territorial common law,⁹⁵ and acknowledging the
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22 ⁹⁴ Appellee's brief in Sanford v. Markham, 221 P. 36 (Okla.
23 1923).

24 ⁹⁵ See Alfred L. Brophy, The Riot in the Oklahoma Supreme
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2 role that special deputies played in destroying
3 Greenwood but failing to find the CITY OF TULSA
4 responsible for such conduct.⁹⁶

5 d. The CITY OF TULSA summarily denied the
6 restitution claims of African American
7 residents, while paying those of whites, in
8 order to prevent or inhibit the filing or
9 continuance of restitution claims by the
10 African American citizens of Greenwood. In
11 particular, the CITY OF TULSA permitted
12 restitution claims made by white owners of
13 stores, who had arms or ammunition looted from
14 their stores. THE STATE OF OKLAHOMA created
15 conditions so adverse to the prosecuting of
16 lawsuits that over 130 complaints filed against
17 insurers, the city, and the state, were
18 prevented from proceeding past the filing
19 stage.
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22 Court, 54 Okla. L. Rev. 67 (2001).

23 ⁹⁶ See Redfearn v. American Central Insurance Co., 221 P. 929
24 (1926).
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e. According to the Commission Report, the state and local governments were instruments of repression used to prevent African Americans from obtaining justice. In fact, after considering a variety of acts of violent repression of African Americans in Oklahoma, Commission concluded that the discussion of the State and City Defendants' culpability in racially motivated attacks on African Americans in the years before, during, and after the Riot could be summed up as follows:

- "In some government participated in the deed.
- In some government performed the deed.
- In none did government prevent the deed.
- In none did government punish the deed."⁹⁷

f. Oklahoma history textbooks published during the 1920s did not mention the Riot at all—nor did ones published in the 1930s.

471. Accordingly, the CITY OF TULSA and THE STATE OF OKLAHOMA should be equitably estopped from asserting any defense

⁹⁷ Commission Report at 19.

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2 premised upon latches or the tolling of the statute of
3 limitations.

4 536. Alternatively, Defendant the CITY OF TULSA in
5 1921 also waived the statute of limitations as an affirmative
6 defense by its express commitment to provide restitution for
7 Riot victims. Specifically, the City stated that a claims
8 commission would compensate the victims of the Riot, thereby
9 inducing them not to file suit.⁹⁸ Additionally, the City
10 actively discouraged fundraising efforts that had begun across
11 the country and interfered with Plaintiffs ability to rebuild
12 their community.

13 537. Furthermore, THE STATE OF OKLAHOMA resurrected
14 Plaintiffs' claims for restitution in 1997 and can not seek
15 harbour behind a statute of limitations defense.

16 538. More specifically, in 1997 and again in 1999, the
17 State Legislature commissioned a report from the Commission,
18 funded the Commission, and charged it with conducting an
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21 ⁹⁸ Alfred Brophy, Reconstructing the Dreamland : The Tulsa
22 Riot of 1921 107 (2002); and at n. 85. (In the June 15, 1921
23 issue of the Nation, the Chair of the Emergency Committee stated
24 that "Tulsa weeps at this unspeakable crime and will make good
25 the damage, so far as it can be done, to the last penny.").

1
2 investigation to determine the causes of the Riot, identify
3 those parties responsible for the Riot and the victims, and to
4 make recommendations regarding reparations and restitution.

5 539. House Joint Resolution 1035 (1997), the statute
6 passed by the Oklahoma legislature and that created the
7 Commission, waives the statute of limitations defense. That
8 statute conceded that:

9 "black persons of that era were practically denied
10 equal access to the civil or criminal justice system
11 in order to obtain damages or other relief for the
12 tortious and criminal conduct which had been
13 committed."

14 and that:

15 "the Greenwood community and the residents who lived
16 and worked there were irrevocably damaged by the
17 tortious and criminal conduct that occurred during the
18 Riot; . . . and . . . at the time of the 1921 riot in
19 the City of Tulsa, the Oklahoma Constitution contained
20 provisions, still effective as law, which provided
21 that: 'All persons have the inherent right to life,
22 liberty, the pursuit of happiness, and the enjoyment
23 of the gains of their own industry.' and further that:
24 'the courts of justice of the State shall be open to
25 every person, and speedy and certain remedy afforded
26 for every wrong and for every injury to person,
property and reputation; and right and justice shall
be administered without sale, denial, delay or
prejudice.'"

540. The Oklahoma State Legislature empowered the
Commission to redress these wrongs, and in so doing waived any
limitations defense the State may mount.

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2 541. Furthermore, the Oklahoma State Legislature, in
3 adopting and implementing the Commission's findings and
4 recommendations by creating The Tulsa Reconciliation Education
5 and Scholarship Program⁹⁹ and the Tulsa Riot Memorial and
6 Reconciliation Act,¹⁰⁰ has expressly or implicitly waived any
7 limitations defense it may mount, since these measures adopt the
8 injunctive relief recommended by the Commission.

9 542. Finally, Governor Keating, acting in his official
10 capacity as Governor of the State of Oklahoma, stated that he
11 "supported direct payments to the 120 survivors of the bloody
12 riots if the report contained persuasive evidence of state
13 culpability."¹⁰¹ Governor Keating admitted that "Compensation for
14 direct loss occasioned by direct state or city action is not
15 inappropriate. . . . But it has to be shown that there was real
16 harm to existing, living individuals and that direct action by
17 the city and the state caused the harm."¹⁰² Clearly, the
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20 ⁹⁹ See 70 Okl. St. Ann. §2621 (West 2002).

21 ¹⁰⁰ See id. at §8201.1.

22 ¹⁰¹ Lois Romano, No Vow to Make Amends for Tulsa; Legislators'
23 Sidestepping Disappoints Survivors of 1921 Race Riot, The
24 Washington Post, Thursday, March 1, 2001 Section A.

25 ¹⁰² Lois Romano, Tulsa Airs a Race Riot's Legacy; State

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2 Commission Report demonstrates such harm. Governor Keating's
3 statement demonstrates the State's express or implied intent to
4 waive any limitations defense should legal liability be
5 established.

6
7 FIRST CAUSE OF ACTION
8 FOR DEPRIVATION OF LIFE AND LIBERTY
9 AND THE PRIVILEGES AND IMMUNITIES
10 OF UNITED STATES CITIZENSHIP
11 IN VIOLATION OF THE FOURTEENTH AMENDMENT
12 OF THE UNITED STATES CONSTITUTION

13 (Against THE CITY OF TULSA, THE CHIEF OF POLICE, and
14 THE TULSA POLICE DEPARTMENT)

15 543. Plaintiffs repeat and re-allege the above
16 allegations as if fully set forth herein.

17 544. Defendants deprived the following Plaintiffs of
18 their constitutionally protected interest in their life,
19 liberty, and bodily integrity, and in enjoying the privileges
20 and immunities of their United States citizenship: JOHN
21 ALEXANDER, JUANITA SMITH BOOKER, KINNEY BOOKER, DOROTHY BOOKER
22 BOULDING, JOHNNIE L. GRAYSON BROWN, JOE R. BURNS, ROSA L. GREEN
23 BYNUM, BEATRICE CAMPBELL-WEBSTER, NAOMI HOOKER CHAMBERLAIN,

24 Historical Panel's Call for Restitution Spurs a Debate, The
25 Washington Post, Wednesday, January 19, 2000, at Section A.

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2 MILDRED MITCHELL CHRISTOPHER, CARRIE HUMPHREY CUDJOE, LUCILLE
3 BUCHANAN FIGURES, ERNESTINE GIBBS, HAROLD GIBBS, HAZEL FRANKLIN
4 HACKETT, MADELEINE HAYNES, JOYCE WALKER HILL, VERA INGRAM,
5 EUNICE CLOMAN JACKSON, DR. HOBART JARRETT, HAZEL DELORES SMITH
6 JONES, MARY TACOMA MAUPIN, ALICE HIGGS LOLLIS, ISHMAEL S. MORAN,
7 SIMON R. RICHARDSON, BEULAH LOREE KEENAN SMITH, GOLDEN WILLIAMS
8 SMITH, DOROTHY WILSON STRICKLAND, LOIS WHITE TAYLOR, BERTRAM C.
9 WILLIAMS, LOUIE BARTON WILLIAMS, and WESS YOUNG.

10 545. The following plaintiffs had relatives who were
11 killed by Defendants: J.B. BATES, LEROY LEON HATCHER, and CECIL
12 WHITE.

13 546. The following plaintiffs were physically and
14 emotionally injured by Defendants: CARRIE HUMPHREY CUDJOE, JAMES
15 DURANT, BEULAH LOREE KEENAN SMITH, LOLA SNEED SNOWDEN, and MARIE
16 WHITEHORN.

17 547. Defendants' actions were deliberate and
18 premeditated. Such actions shock the conscience, and
19 demonstrate a deliberate indifference to life, liberty and
20 bodily integrity.

21 548. As a consequence of Defendants' intentionally
22 discriminatory actions, Plaintiffs JOHN ALEXANDER, JUANITA SMITH
23 BOOKER, KINNEY BOOKER, DOROTHY BOOKER BOULDING, JOHNNIE L.
24 GRAYSON BROWN, JOE R. BURNS, ROSA L. GREEN BYNUM, BEATRICE
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2 CAMPBELL-WEBSTER, NAOMI HOOKER CHAMBERLAIN, MILDRED MITCHELL
3 CHRISTOPHER, CARRIE HUMPHREY CUDJOE, LUCILLE BUCHANAN FIGURES,
4 ERNESTINE GIBBS, HAROLD GIBBS, HAZEL FRANKLIN HACKETT, MADELEINE
5 HAYNES, JOYCE WALKER HILL, VERA INGRAM, EUNICE CLOMAN JACKSON,
6 DR. HOBART JARRETT, HAZEL DELORES SMITH JONES, MARY TACOMA
7 MAUPIN, ALICE HIGGS LOLLIS, ISHMAEL S. MORAN, SIMON R.
8 RICHARDSON, BEULAH LOREE KEENAN SMITH, GOLDEN WILLIAMS SMITH,
9 DOROTHY WILSON STRICKLAND, LOIS WHITE TAYLOR, BERTRAM C.
10 WILLIAMS, LOUIE BARTON WILLIAMS, WESS YOUNG, J.B. BATES, LEROY
11 LEON HATCHER, CECIL WHITE, CARRIE HUMPHREY CUDJOE, JAMES DURANT,
12 BEULAH LOREE KEENAN SMITH, LOLA SNEED SNOWDEN, and MARIE
13 WHITEHORN were denied their life, liberty, and bodily integrity,
14 and the enjoyment of the privileges and immunities of United
15 States citizenship,¹⁰³ and have sustained physical and mental
16 injuries, and are entitled to damages in amount to be determined
17 at trial.

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21 ¹⁰³ See, e.g., Clarence Thomas, The Higher Law Background of
22 the Privileges or Immunities Clause, 12 Harv. J.L. & Pub. Pol.
23 63, 68 (1989); Philip B. Kirkland, The Privileges or Immunities
24 Clause: Its Hour Come 'Round at Last, Its Hour Come 'Round at
25 Last? 1972 Washington Univ. L.Q. 405 at 418-420.

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2
3 SECOND CAUSE OF ACTION
4 FOR DEPRIVATION OF PROPERTY AND PRIVILEGES
5 AND IMMUNITIES IN VIOLATION OF THE FOURTEENTH
6 AMENDMENT OF THE UNITED STATES CONSTITUTION

7
8 (Against THE CITY OF TULSA, THE CHIEF OF POLICE, and
9 THE TULSA POLICE DEPARTMENT)

10
11 549. Plaintiffs repeat and re-allege the above
12 allegations as if fully set forth herein.

13
14 550. Defendants deprived the following Plaintiffs of
15 their constitutionally protected property interest in their
16 residences, places of business, land, and personal property:
17 J.B. BATES, ESSIE LEE JOHNSON BECK, J.D. BELL, PHINES BELL,
18 EUGENE BOLTON, JAMES BOLTON, JUANITA SMITH BOOKER, KINNEY
19 BOOKER, DOROTHY BOOKER BOULDING, JEANETTE McNEAL BRADSHAW,
20 TERESA EARLEE BRIDGES DYSART, PATRICIA DUKES BROME, JOHNNIE L.
21 GRAYSON BROWN, ROSA L. GREEN BYNUM, MURIEL MIGNON LILLY CABELL,
22 MILDRED MITCHELL CHRISTOPHER, MILDRED LUCAS CLARK, OTIS
23 GRANVILLE CLARK, BLANCHE CHATMAN COLE, CARRIE HUMPHREY CUDJOE,
24 ROBERT CHARLES DUKES, WILLIE DUKES, HATTIE LILLY DUNN, JAMES
25 DURANT, LUCILLE BUCHANAN FIGURES, ARCHIE JACKSON FRANKLIN,
26 JIMMIE LILLY FRANKLIN, ERNESTINE GIBBS, HAROLD GIBBS, MARGARET
TILLEY GIBBS, THERESSA CORNELLA McNEAL GILLIAM, MILDRED JOHNSON
HALL HAZEL FRANKLIN HACKETT, KATHERINE WOOD HALE, LEROY LEON
HATCHER, MADELEINE HAYNES, JOYCE WALKER HILL, DR. OLIVIA J.

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2 HOOKER, SAMUEL L. HOOKER, JR., WILHELMINA GUESS HOWELL, MILDRED
3 WALLACE HUDSPETH, VERA INGRAM, GENEVIEVE ELIZABETH TILLMAN
4 JACKSON, DR. HOBART JARRETT, WILMA MITCHELL JOHNSON, HAZEL
5 DELORES SMITH JONES, THELMA KNIGHT, CAROL SMITHERMAN MARTIN,
6 MARY TACOMA MAUPIN, RUTH DEAN NASH, SIMEON L. NEAL, ALMADGE J.
7 NEWKIRK, JUANITA MAXINE SCOTT PARRY, IDA BURNS PATTERSON, DELOIS
8 VADEN RAMSEY, JEWEL SMITHERMAN ROGERS, GERLINE HELEN WRIGHT
9 SAYLES, JULIUS WARREN SCOTT, VENEICE DUNN SIMS, HARRIET ADAMS
10 SMITH, BEULAH LOREE KEENAN SMITH, GOLDEN WILLIAMS SMITH, LOLA
11 SNEED SNOWDEN, JAMES L. STEWARD, DOROTHY WILSON STRICKLAND, LOIS
12 WHITE TAYLOR, WILLIE MAE SHELBURN THOMPSON, EFFIE LEE SPEARS
13 TODD, MELVIN C. TODD, QUEEN ESTHER LOVE WALKER, SAMUEL WALKER,
14 TROY SIDNEY WALKER, SYLVIA WARE, and MARY LEON BROWN WATSON.

15 551. Defendants burned, looted, and otherwise
16 destroyed or misappropriated these Plaintiffs' property of
17 without a hearing and without due process of law in violation of
18 their property rights and the privileges and immunities of their
19 citizenship as guaranteed under the Fourteenth Amendment of the
20 United States Constitution.¹⁰⁴

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23 ¹⁰⁴ See, e.g., Clarence Thomas, The Higher Law Background of
24 the Privileges or Immunities Clause, 12 Harv. J.L. & Pub. Pol.
25 63, 68 (1989); Philip B. Kirkland, The Privileges or Immunities

1
2 552. Defendants have never returned such
3 misappropriated property or paid compensation for its loss.

4 553. Plaintiffs J.B. BATES, ESSIE LEE JOHNSON BECK,
5 J.D. BELL, PHINES BELL, EUGENE BOLTON, JAMES BOLTON JUANITA
6 SMITH BOOKER, KINNEY BOOKER, DOROTHY BOOKER BOULDING, JEANETTE
7 McNEAL BRADSHAW, TERESA EARLEE BRIDGES DYSART, PATRICIA DUKES
8 BROME, JOHNNIE L. GRAYSON BROWN, ROSA L. GREEN BYNUM, MURIEL
9 MIGNON LILLY CABELL, MILDRED MITCHELL CHRISTOPHER, MILDRED LUCAS
10 CLARK, OTIS GRANVILLE CLARK, BLANCHE CHATMAN COLE, CARRIE
11 HUMPHREY CUDJOE, ROBERT CHARLES DUKES, WILLIE DUKES, HATTIE
12 LILLY DUNN, JAMES DURANT, LUCILLE BUCHANAN FIGURES, ARCHIE
13 JACKSON FRANKLIN, JIMMIE LILLY FRANKLIN, ERNESTINE GIBBS, HAROLD
14 GIBBS, MARGARET TILLEY GIBBS, THERESSA CORNELLA McNEAL GILLIAM,
15 KATHERINE WOOD HALE, MILDRED JOHNSON HALL, HAZEL FRANKLIN
16 HACKETT, LEROY LEON HATCHER, MADELEINE HAYNES, JOYCE WALKER
17 HILL, DR. OLIVIA J. HOOKER, SAMUEL L. HOOKER, JR., WILHELMINA
18 GUESS HOWELL, MILDRED WALLACE HUDSPETH, VERA INGRAM, GENEVIEVE
19 ELIZABETH TILLMAN JACKSON, DR. HOBART JARRETT, WILMA MITCHELL
20 JOHNSON, HAZEL DELORES SMITH JONES, JULIA BONTON JONES, THELMA
21 KNIGHT, CAROL SMITHERMAN MARTIN, MARY TACOMA MAUPIN, RUTH DEAN
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24 Clause: Its Hour Come 'Round at Last, Its Hour Come 'Round at
25 Last? 1972 Washington Univ. L.Q. 405 at 418-420.

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2 NASH, SIMEON L. NEAL, ALMADGE J. NEWKIRK, JUANITA MAXINE SCOTT
3 PARRY, IDA BURNS PATTERSON, DELOIS VADEN RAMSEY, JEWEL
4 SMITHERMAN ROGERS, GERLINE HELEN WRIGHT SAYLES, JULIUS WARREN
5 SCOTT, VENEICE DUNN SIMS, HARRIET ADAMS SMITH, BEULAH LOREE
6 KEENAN SMITH, GOLDEN WILLIAMS SMITH, LOLA SNEED SNOWDEN, JAMES
7 L. STEWARD, DOROTHY WILSON STRICKLAND, LOIS WHITE TAYLOR, WILLIE
8 MAE SHELBURN THOMPSON, EFFIE LEE SPEARS TODD, MELVIN C. TODD,
9 QUEEN ESTHER LOVE WALKER, SAMUEL WALKER, TROY SIDNEY WALKER,
10 SYLVIA WARE, and MARY LEON BROWN WATSON have suffered property
11 damage in an amount to be specified at trial.

12
13 THIRD CAUSE OF ACTION
14 FOR VIOLATION OF THE EQUAL PROTECTION
15 CLAUSE AND THE PRIVILEGES AND IMMUNITIES
16 CLAUSE OF THE FOURTEENTH AMENDMENT
17 TO THE UNITED STATES CONSTITUTION

18
19 (Against THE CITY OF TULSA, THE CHIEF OF POLICE, and
20 THE TULSA POLICE DEPARTMENT)

21
22 554. Plaintiffs repeat and re-allege the above
23 allegations as if fully set forth herein.

24
25 555. Defendants deprived all of the Plaintiffs of
26 their right to equal protection of the laws and the privileges
and immunities of their citizenship as guaranteed under the
Fourteenth Amendment of the United States Constitution.

1
2 556. The Defendants engaged in a longstanding and
3 official policy, practice, custom, habit and usage to deny
4 African Americans their equal rights under the law. This was
5 done in numerous ways, described below.

6 557. Defendants permitted Plaintiffs to be physically
7 attacked, even participating in some of the attacks, resulting
8 in bodily injury, death and destruction and theft of property.
9 Defendants, with deliberate indifference and on the basis of
10 race, failed to protect Plaintiffs from repeated criminal acts,
11 failed to equally enforce the laws and branded Plaintiffs with
12 the racial badges of inferiority and slavery in the form of
13 racial epithets. Defendants' failure to prevent or aid in
14 preventing the commission of racial crimes exacerbated the Riot
15 and led to further wrongs against Plaintiffs. Defendants failed
16 to adequately train and supervise those persons it deputized and
17 those persons to whom it issued ammunition during the Riot.
18 Defendants failed to meaningfully investigate and act upon
19 complaints filed by Plaintiffs on the basis of race. Defendants
20 routinely under-investigated, under-responded, undercharged,
21 mishandled and failed to protect Plaintiffs from a series of
22 criminal acts or prosecute those responsible for such acts.
23 Defendants abdicated their responsibility to investigate,
24 develop and charge white citizens with crimes against
25

1
2 Plaintiffs, thereby affirming and jointly participating in
3 racially motivated acts to deprive Plaintiffs of their
4 constitutional and statutory rights. Defendants failed to make
5 whole Plaintiffs by providing restitution and reparations it
6 promised and committed to them.

7 558. Defendants did not treat white citizens in the
8 same or similar manner to Plaintiffs.

9 559. As a consequence of the intentional racially
10 discriminatory acts of Defendants, all of the Plaintiffs were
11 denied the equal protection of the laws and the privileges and
12 immunities of their United States citizenship in violation of
13 the Fourteenth Amendment,¹⁰⁵ and are entitled to damages in an
14 amount to be determined at trial.

15
16 FOURTH CAUSE OF ACTION
FOR VIOLATION OF 42 U.S.C. §1981

17 (Against all Defendants)
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21 ¹⁰⁵ See, e.g., Clarence Thomas, The Higher Law Background of
22 the Privileges or Immunities Clause, 12 Harv. J.L. & Pub. Pol.
23 63, 68 (1989); Philip B. Kirkland, The Privileges or Immunities
24 Clause: Its Hour Come 'Round at Last, Its Hour Come 'Round at
25 Last? 1972 Washington Univ. L.Q. 405 at 418-420.

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2 560. Plaintiffs repeat and re-allege the above
3 allegations as if fully set forth herein.

4 561. Defendants deprived all of the Plaintiffs of
5 their "full and equal benefit of all laws and proceedings for
6 the security of persons and property as is enjoyed by white
7 citizens" in violation of 42 U.S.C. §1981, including
8 specifically §1981(c).

9 562. Defendants also denied Plaintiffs the same right
10 to sue, be parties, and give evidence, as is enjoyed by white
11 citizens, in violation of 42 U.S.C. §1981, including
12 specifically §1981(c).

13 563. Defendants specifically targeted Plaintiffs on
14 the basis of their race. This intentional discrimination was
15 accomplished by a longstanding and official policy, practice,
16 custom, habit and usage to deny African Americans their equal
17 rights under the law. This was done in numerous ways, described
18 below.

19 564. Defendants permitted Plaintiffs to be physically
20 attacked, even participating in some of the attacks, resulting
21 in bodily injury, death and destruction and theft of property.
22 Defendants, with deliberate indifference and on the basis of
23 race, failed to protect Plaintiffs from repeated criminal acts,
24 failed to equally enforce the laws and branded Plaintiffs with
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2 the racial badges of inferiority and slavery in the form of
3 racial epithets. Defendants' failure to prevent or aid in
4 preventing the commission of racial crimes exacerbated the Riot
5 and led to further wrongs against Plaintiffs. Defendants failed
6 to adequately train and supervise those persons it deputized and
7 those persons to whom it issued ammunition during the Riot.
8 Defendants failed to meaningfully investigate and act upon
9 complaints filed by Plaintiffs on the basis of race. Defendants
10 routinely under-investigated, under-responded, undercharged,
11 mishandled and failed to protect Plaintiffs from a series of
12 criminal acts or prosecute those responsible for such acts.
13 Defendants abdicated their responsibility to investigate,
14 develop and charge white citizens with crimes against
15 Plaintiffs, thereby affirming and jointly participating in
16 racially motivated acts to deprive Plaintiffs of their
17 constitutional and statutory rights. Defendants failed to make
18 whole Plaintiffs by providing restitution and reparations it
19 promised to them.

20 565. Defendants did not treat white citizens in the
21 same or similar manner to Plaintiffs.

22 566. Consequently, all of Plaintiffs have sustained
23 injuries in an amount to be determined at trial.
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3 FIFTH CAUSE OF ACTION
4 FOR VIOLATION OF 42 U.S.C. §1983

5 (Against THE CITY OF TULSA, THE CHIEF OF POLICE, THE
6 TULSA POLICE DEPARTMENT and DOES 1 through 100)

7 567. Plaintiffs repeat and re-allege the above
8 allegations as if fully set forth herein.

9 568. Plaintiffs were deprived of their federal rights
10 pursuant to Defendants' longstanding official policies,
11 practices, or customs of racial discrimination, as described in
12 the allegation set forth above. These policies, practices, or
13 customs were persistent, widespread, common, routine, well-
14 settled, and adopted with reckless or callous indifference to
15 federally protected rights, and causally connected to violations
16 of federal law described below.

17 569. Defendants permitted Plaintiffs to be physically
18 attacked, even participating in some of the attacks, resulting
19 in bodily injury, death and destruction and theft of property.
20 Defendants, with deliberate indifference and on the basis of
21 race, failed to protect Plaintiffs from repeated criminal acts,
22 failed to equally enforce the laws and branded Plaintiffs with
23 the racial badges of inferiority and slavery in the form of
24 racial epithets. Defendants' failure to prevent or aid in
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2 preventing the commission of racial crimes exacerbated the Riot
3 and led to further wrongs against Plaintiffs. Defendants failed
4 to adequately train and supervise those persons it deputized and
5 those persons to whom it issued ammunition during the Riot.
6 Defendants failed to meaningfully investigate and act upon
7 complaints filed by Plaintiffs on the basis of race. Defendants
8 routinely under-investigated, under-responded, undercharged,
9 mishandled and failed to protect Plaintiffs from a series of
10 criminal acts or prosecute those responsible for such acts.
11 Defendants abdicated their responsibility to investigate,
12 develop and charge white citizens with crimes against
13 Plaintiffs, thereby affirming and jointly participating in
14 racially motivated acts to deprive Plaintiffs of their
15 constitutional and statutory rights. Defendants failed to make
16 whole Plaintiffs by providing restitution and reparations it
17 promised to them.

18 570. Defendants did not treat white citizens in the
19 same or similar manner to Plaintiffs.

20 571. Consequently, all of the Plaintiffs have
21 sustained injuries and property damage in an amount to be
22 specified at trial.

SIXTH CAUSE OF ACTION
FOR VIOLATION OF 42 U.S.C. §1985

(Against THE CITY OF TULSA, THE CHIEF OF POLICE, THE
TULSA POLICE DEPARTMENT and DOES 1 through 100)

572. Plaintiffs repeat and re-allege the above allegations as if fully set forth herein.

573. The STATE OF OKLAHOMA and the CITY OF TULSA conspired to deprive all of the Plaintiffs the equal protection of the laws and equal privileges and immunities under the laws, thereby injuring Plaintiffs.

574. In furtherance of this conspiracy, Defendants adopted official policies, practices, or customs of racial discrimination, as described in the allegations set forth above, that injured Plaintiffs in their persons and properties as well as deprived Plaintiffs of having and exercising the equal protection of the laws and equal privileges and immunities of a citizen of the United states, as described herein.

575. Defendants permitted Plaintiffs to be physically attacked, even participating in some of the attacks, resulting in bodily injury, death and destruction and theft of property. Defendants, with deliberate indifference and on the basis of race, failed to protect Plaintiffs from repeated criminal acts,

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2 failed to equally enforce the laws and branded Plaintiffs with
3 the racial badges of inferiority and slavery in the form of
4 racial epithets. Defendants' failure to prevent or aid in
5 preventing the commission of racial crimes exacerbated the Riot
6 and led to further wrongs against Plaintiffs. Defendants failed
7 to adequately train and supervise those persons it deputized and
8 those persons to whom it issued ammunition during the Riot.
9 Defendants failed to meaningfully investigate and act upon
10 complaints filed by Plaintiffs on the basis of race. Defendants
11 routinely under-investigated, under-responded, undercharged,
12 mishandled and failed to protect Plaintiffs from a series of
13 criminal acts or prosecute those responsible for such acts.
14 Defendants abdicated their responsibility to investigate,
15 develop and charge white citizens with crimes against
16 Plaintiffs, thereby affirming and jointly participating in
17 racially motivated acts to deprive Plaintiffs of their
18 constitutional and statutory rights. Defendants failed to make
19 whole Plaintiffs by providing restitution and reparations it
20 promised to them.

21 576. As a result of the conspiracy between Defendants,
22 all of the Plaintiffs have sustained injuries and property
23 damage in an amount to be specified at trial.
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SEVENTH CAUSE OF ACTION
PROMISSORY ESTOPPEL

(Against THE STATE OF OKLAHOMA and THE CITY OF TULSA)

577. Plaintiffs repeat and re-allege the above allegations as if fully set forth herein.

578. Defendants clearly and unambiguously promised to provide restitution and/or reparations to the Plaintiffs for the damage Defendants inflicted during the course of the Riot; Defendants reasonably foresaw that Plaintiffs would rely upon those promises; Plaintiffs did rely upon those promises to their detriment; and the hardship and unfairness suffered by the Plaintiffs may only be avoided by THE STATE OF OKLAHOMA and the CITY OF TULSA restoring the benefits to which the Plaintiffs are due.

1. State of Oklahoma

579. Defendant THE STATE OF OKLAHOMA promised Plaintiffs in 1999 that restitution and/or reparations would be made for damages incurred during the Riot, upon which Plaintiffs reasonably relied to their detriment. Defendants knew that such assertions would result in Plaintiffs' reliance and Plaintiffs did in fact reasonably relied on Defendants' assurances by not filing suit for restitution prior.

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2 580. More specifically, in 1997, pursuant to House
3 Joint Resolution 1035 (1997), the State Legislature commissioned
4 a report from the Commission, funded the Commission, and charged
5 it with conducting an investigation to determine the causes of
6 the Riot, identify those parties responsible for the Riot and
7 the victims, and to make recommendations regarding reparations
8 and restitution.

9 581. House Joint Resolution 1035 (1997) conceded that:

10 "black persons of that era were practically denied
11 equal access to the civil or criminal justice system
12 in order to obtain damages or other relief for the
13 tortious and criminal conduct which had been
14 committed."

15 and that:

16 "the Greenwood community and the residents who lived
17 and worked there were irrevocably damaged by the
18 tortious and criminal conduct that occurred during the
19 Riot; . . . and . . . at the time of the 1921 riot in
20 the City of Tulsa, the Oklahoma Constitution contained
21 provisions, still effective as law, which provided
22 that: 'All persons have the inherent right to life,
23 liberty, the pursuit of happiness, and the enjoyment
24 of the gains of their own industry.' and further that:
25 'the courts of justice of the State shall be open to
26 every person, and speedy and certain remedy afforded
for every wrong and for every injury to person,
property and reputation; and right and justice shall
be administered without sale, denial, delay or
prejudice.'"

27 582. Furthermore, Governor Keating, acting in his
28 official capacity as Governor of the State of Oklahoma, stated

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2 that he "supported direct payments to the 120 survivors of the
3 bloody riots if the report contained persuasive evidence of
4 state culpability."¹⁰⁶ Governor Keating admitted that
5 "Compensation for direct loss occasioned by direct state or city
6 action is not inappropriate But it has to be shown that
7 there was real harm to existing, living individuals and that
8 direct action by the city and the state caused the harm"¹⁰⁷
9 Clearly, the Commission Report demonstrates such harm.

10 583. The Oklahoma State Legislature empowered the
11 Commission to redress these wrongs, and it was foreseeable that
12 Plaintiffs would rely upon the recommendations contained within
13 the Commission's Report.

14 584. Furthermore, the Oklahoma State Legislature, in
15 adopting and implementing the Commission's findings and
16 recommendations by creating The Tulsa Reconciliation Education
17 and Scholarship Program¹⁰⁸ and the Tulsa Riot Memorial of
18 Reconciliation,¹⁰⁹ induced reliance by the Plaintiffs, since these
19 measures provide the injunctive relief recommended by the
20

21
22 ¹⁰⁶. Lois Romano, No Vow to Make Amends for Tulsa; Legislators'
23 Sidestepping Disappoints Survivors of 1921 Race Riot, The
24 Washington Post, Thursday, March 1, 2001 Section A.

25 ¹⁰⁷. Lois Romano, Tulsa Airs a Race Riot's Legacy; State
26 Historical Panel's Call for Restitution Spurs a Debate, The
Washington Post, Wednesday, January 19, 2000, at Section A.

¹⁰⁸. See 70 Okl. St. Ann. §2621 (West 2002).

¹⁰⁹. See id. at §8201.1.

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2 Commission, creating the expectation that monetary relief would
3 be forthcoming.

4 585. Plaintiffs have indeed relied to their detriment
5 upon Defendant's promises by foregoing other means of
6 compensation in the justified expectation that the State would
7 compensate them for the Riot.

8 586. Plaintiffs may only be avoiding the unfairness
9 and hardship resulting from Defendant's behavior by receiving
10 the compensation promised by the State Of Oklahoma in 1997 and
11 1999.

12 2. City of Tulsa

13 587. Defendant the CITY OF TULSA promised Plaintiffs
14 both in 1921 and 1999 that restitution would be made for damages
15 incurred during the Riot, upon which Plaintiffs reasonably
16 relied to their detriment. Defendant knew that such assertions
17 would result in Plaintiffs' reliance.

18 588. Specifically, the City stated that a claims
19 commission would compensate the victims of the Riot, thereby
20 inducing them not to file suit. In particular, the Tulsa
21 Chamber of Commerce stated that as "quickly as possible
22 rehabilitation will take place and reparation made
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2 Tulsa feels intensely humiliated."¹¹⁰ In the June 15, 1921 issue
3 of the Nation, the Chair of the Emergency Committee stated that
4 "Tulsa weeps at this unspeakable crime and will make good the
5 damage, so far as it can be done, to the last penny."

6 Additionally, the City discouraged fundraising efforts that had
7 begun across the country and interfered with efforts by the
8 Plaintiffs to rebuild their community.

9 589. Plaintiffs did in fact reasonably relied on
10 Defendants' assurances by not filing suit for restitution prior
11 to the commencement of this lawsuit. Plaintiffs and their
12 families did not file lawsuits in the belief that the CITY OF
13 TULSA would compensate them for damages suffered during the
14 Riot. In reliance on this promise, Plaintiffs lost their
15 opportunity to seek the damages incurred by the Riot.

16
17 EIGHTH CAUSE OF ACTION
NEGLIGENCE

18 (Against the STATE OF OKLAHOMA, CITY OF TULSA, THE
19 CHIEF OF POLICE, and THE TULSA POLICE DEPARTMENT)

20 590. Plaintiffs repeat and re-allege the above
21 allegations as if fully set forth herein.

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24 ¹¹⁰ Alfred Brophy, Reconstructing the Dreamland : The Tulsa
25 Riot of 1921 107 (2002).

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2 591. Defendants breached their duty to Plaintiffs by,
3 in the course of their employment, negligently deputizing and
4 issuing ammunition and guns to persons they knew or should have
5 known posed a danger to the African American community of
6 Greenwood.

7 592. Defendants failed to adequately train and
8 supervise those persons it deputized and those persons to whom
9 it issued guns and ammunition.

10 593. Defendants breached their duty to Plaintiffs by
11 failing to adequately train and supervise the National Guardsmen
12 and members of the police who were called to duty during the
13 Riot and who (a) deputized white citizens of Tulsa who were
14 clearly inebriated or who they knew or should have known posed a
15 danger to the African American community; (b) aided and abetted
16 the attacks on Plaintiffs; (c) encouraged and condoned the
17 attacks upon Plaintiffs and (d) participated in the attacks upon
18 Plaintiffs.

19 594. As a direct and proximate result of Defendants'
20 negligence, all of the Plaintiffs have sustained injuries and
21 property damages in an amount to be specified at trial.

1
2 PRAYER FOR RELIEF

3 WHEREFORE, Plaintiffs pray for relief from Defendants
4 as follows:

5 i. For general and specific damages according to
6 proof;

7 ii. For the amount of attorney's fees and related
8 legal expenses incurred by Plaintiffs in pursuit of the benefits
9 to which they are entitled;


10 iii. For exemplary and punitive damages in an amount
11 sufficient to punish Defendants the STATE OF OKLAHOMA, THE CITY
12 OF TULSA, the TULSA CHIEF OF POLICE, and the TULSA POLICE
13 DEPARTMENT for their reprehensible behavior;

14 iv. For pre-judgment interest;

15 v. For such other and further relief, including
16 injunctive and declaratory relief, that the Court
17 deems just and appropriate.

18
19 Plaintiffs request a jury trial.

20 DATED: APRIL 28, 2003

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