



Provided by:  
Overhauser Law Offices  
LLC  
www.iniplaw.org  
www.overhauser.com

FILED

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF INDIANA**

CLERK OF COURT  
FOR THE NORTHERN DISTRICT  
OF INDIANA

Angela E. Brooks-Ngwenya, )

PLAINTIFF )

[Type or print your name on the line above] )

v. )

Bart Peterson's Mind Trust, )

DEFENDANT )

[Type or print only the name of the first )  
person you are suing. List everyone you )  
are suing on page 2.] )

Cause No. 1:16CV 193 PPS

[Leave this blank, the clerk will  
supply the cause number when  
your case is received.]

**COMPLAINT**  
**42 U.S.C. § 1983**

I. PARTIES

A. PLAINTIFF [You are the plaintiff in this lawsuit. Neatly print or type your information below.]

1. Angela E. Brooks-Ngwenya  
Name: First Middle Last

2. What is your address: 4731 Glenmary Drive, Fort Wayne, IN 46806

Phone number ( 317 ) 205-6507

B. DEFENDANT(S) How many defendants are you suing: 1

[The defendants are the people you are suing. Print or type the defendant's name, job title, the state or local government agency the defendant works for, and the address of that government agency. Remember to include the defendant you named in the caption on page one. If you are suing more than one defendant, number them.]

#	Defendant's Name	Job Title/Government Agency	Work Address
	Bart Peterson's The Mind Trust		1630 N. Meridian Street Suite 450 Indpls, IN 46202

**II. CAUSE(S) OF ACTION WITH SUPPORTING FACTS**

Write why you are suing each defendant. Write who, what, when, where, and how you believe your rights were violated. It is **VERY IMPORTANT** that you use each defendant's name in describing what happened to you. If you do not write what each defendant did, the court will not know why you are suing and that defendant will be dismissed.

Explain what constitutional or federal law right, privilege or immunity each defendant violated. Do not cite or quote cases or statutes. If you want to make legal arguments or citations, you must file a separate memorandum of law. Do not attach it to this complaint.

Write a new paragraph for each violation. Name each defendant involved in that violation.

Number your paragraphs. 17:101 Copyright Infringement

1. Plaintiff has legal copyrights on the Transitioning Into Responsible Students Educational Model. In compliance to 17, USC 411 (a), Plaintiff holds legal registration for the Transitioning Into Responsible Students Education Model.

2013-2016, Entities utilized the TIRS Education Model without plaintiff's consent or knowledge. Both Andrew Brown Education Model and Bridges To Success Model are replica's of Transitioning Into Responsible Students Model.

Plaintiff submits this as new evidence as she did not have access to Bart Peterson's Fast Break Manuel or Duncan "Pat" Pritichett's Doing What Matters Manuel until , 2015.

Cause(s) of Action with Supporting Facts (continued)

Plaintiff piloted Transistioning Into Responsible Students @ Gambold Middle School, Francis Scott Key Learning Center from October, 2002- June, 2003.  
Plaintiff submits Evidentiary Records and Exhibits in support of her claims.

The Evidentiary Records and Exhibits will prove that Defendants used TIRS to create Andrew J. Brown Academy and Bridges To Success Models.

III. PREVIOUS LAWSUITS

Have you ever sued anyone for the same things you wrote about in this complaint?

NO  YES - *[Print or type the following information about the case. Attach additional sheets if there is more than one prior case.]*

Court: Northern District

Judge: \_\_\_\_\_ Docket Number: 1:16-cv-00183

Date filed: 5/26/2016 Date closed: \_\_\_\_\_

IV. RELIEF

Write exactly what you want the court to do for you. This court cannot order that a defendant be fired, investigated, or criminally prosecuted.

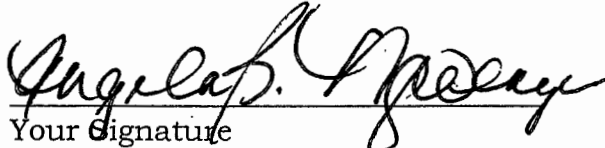
Plaintiff is requesting a Trial by Jury.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

V. VERIFICATION AND SIGNATURE

**Initial Each Statement and Sign at the Bottom**

- I have included two properly completed summons forms (available from the clerk) for each defendant I am suing, including full name, job title and work address.
- I have included one properly completed process receipt and return form (USM-285) (available from the U.S. Marshal) for each defendant I am suing.
- In addition to this complaint with an original signature, I have included one copy of this complaint for each defendant and one extra for the court.
- I have included full payment of the filing fee **OR** attached a properly completed petition to proceed *in forma pauperis* (available from the clerk).
- I agree to promptly notify the clerk of any change of address.
- I have read all of the statements in this complaint. *[Do not forget to keep a copy for your records.]*
- I declare **under penalty of perjury** that the foregoing is true and correct.

Signed this 6th day of June, 2016.

  
Your Signature