

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE

Amber Baltimore, Taylor Ledbetter,
and Cody Ainsworth, as surviving
children and next of kin of Ronnie Glenn
Ledbetter,

Plaintiff,

vs.

Grundy County, TN;

Heath Gunter, Justin Graham, Jayven Bess,
Kenneth Nunley, Brandon King, and David
Young,
in their individual capacities as officers of the
Grundy County Sheriff's Department;

Joshua Turner in his individual capacity as a
correctional officer for the Grundy County
Jail;

Defendants.

Case No. _____

Jury Trial Demanded

COMPLAINT FOR DAMAGES WITH JURY DEMAND

COMES NOW the Plaintiffs, Amber Baltimore, Taylor Ledbetter, and Cody
Ainsworth, who are the surviving children and next kin of Ronnie Ledbetter, and for
cause of actions against the Defendants, respectfully states as follows:

I. PRELIMINARY STATEMENT

1. This is a civil rights action brought under the Fourth and Fourteenth Amendments to the Constitutions of the United States and Title 42 of the United States Code, Sections 1983 and 1988. Plaintiffs bring this action to obtain compensatory damages, punitive damages, attorney's fees, costs, and other equitable relief for Mr. Ledbetter's false and unlawful arrest on May 29, 2024, and his subsequent unlawful detention and sustained injuries.

2. The police officers who beat and arrested Mr. Ledbetter acted under color of law when they violated his constitutional right to be free from the use of excessive force, thereby causing his brutal death. Furthermore, these law enforcement officers acted in accordance with unconstitutional policies, customs, usages, and/or practices that had been promulgated by the policymakers in their respective jurisdictions.

3. Mr. Ledbetter leaves behind an estate with beneficiaries, including his three (3) children. Therefore, as Mr. Ledbetter's surviving children, Plaintiffs Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth seek money damages against these law enforcement officers pursuant to 42 U.S.C. § 1983 to redress the deprivation of Mr. Ledbetter's established rights as secured by the Fourth and Fourteenth Amendments to the United States Constitution. Moreover, Plaintiffs seek money damages against Grundy County, Tennessee pursuant to *Monell v. Department of Social Services*, 436 U.S. 658 (1978) and its progeny because the unconstitutional policies, customs, usages, and practices of this County were the moving forces behind the actions of their respective

police officers. Plaintiffs also seek their attorney's fees and costs pursuant to 42 U.S.C. § 1988.

II. Jurisdiction and Venue

4. This action is brought against the Defendants pursuant to 42 U.S.C. § 1983, which authorizes actions to redress deprivation, under color of state law, of rights, privileges, and immunities secured to Mr. Ledbetter by the Constitution of the United States.

5. Jurisdiction is founded upon 28 U.S.C. § 1331 and § 1343, as well the Fourth and Fourteenth Amendments to the Constitution of the United States.

6. This Court has supplemental jurisdiction to adjudicate state law claims, if any, which arise from the same facts and circumstances, pursuant to 28 U.S.C. § 1337(a).

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1331 in that the factual acts and omissions which gave rise to this cause of action occurred within this district and within one (1) year of the filing of this Complaint and this Court otherwise has jurisdiction.

8. All parties are subject to the jurisdiction of this Court.

The Parties

9. At all times relevant hereto and until the time of his death on May 29, 2024, the decedent, Ronnie Ledbetter was a citizen of the United States and of the State of Tennessee.

10. The Plaintiffs, Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth are the children and next of kin of Ronnie Ledbetter. Pursuant to Tennessee's wrongful death

statutes, Plaintiffs have a duty to protect the interests of their late father's estate. Amber Baltimore is an adult resident citizen of the County of Bedford, State of Tennessee. Taylor Ledbetter is an adult resident citizen of the County of Bedford, State of Tennessee. Cody Ainsworth is an adult resident citizen of the County of Hamilton, State of Tennessee.

11. Defendant Grundy County, Tennessee is a political subdivision of the State of Tennessee. At all material times, Defendant was responsible for the training and supervision of Defendants Heath Gunter, Justin Graham, Jayven Bess, Kenneth Nunley, Brandon King, David Young and Joshua Turner. At all material times, the County of Grundy, Tennessee delegated to Sheriff Heath Gunter the responsibility to establish and implement policies, practices, procedures and customs used by the Grundy County Sheriff's Department regarding the use of force and the escalation of encounters with individuals experiencing distress. At all material times, Defendant Grundy County, Tennessee acted under color of law.

12. Defendant Heath Gunter, at all relevant times, he was the duly elected Sheriff of Grundy County, Tennessee and acting under color of state law by virtue of his authority as Sheriff for the Grundy County Sheriff's Department. Defendant Gunter is responsible for hiring, training, and supervision of all law enforcement officers employed by Grundy County Sheriff's Department. He created and authorized implementation of relevant policy and procedures which oversaw and directed all law enforcement officers employed by Grundy County Sheriff's Department. He is sued in his individual capacity and under a theory of respondeat superior.

13. Defendant Justin Graham was employed by Grundy County, Tennessee and the Grundy County Sheriff's Department. At all material times, Defendant Graham acted under color of state law by virtue of his authority as a law enforcement officer for the Grundy County Sheriff's Department. He is sued in his individual capacity.

14. Defendant Jayven Bess was employed by Grundy County, Tennessee and the Grundy County Sheriff's Department. At all material times, Defendant Bess acted under color of state law by virtue of his authority as a law enforcement officer for the Grundy County Sheriff's Department. He is sued in his individual capacity.

15. Defendant Kenneth Nunley was employed by Grundy County, Tennessee and the Grundy County Sheriff's Department. At all material times, Defendant Nunley acted under color of state law by virtue of his authority as a law enforcement officer for the Grundy County Sheriff's Department. He is sued in his individual capacity.

16. Defendant Sergeant Brandon King, formerly chief deputy, was employed by Grundy County, Tennessee and the Grundy County Sheriff's Department. At all material times, Defendant King acted under color of state law by virtue of his authority as a law enforcement officer for the Grundy County Sheriff's Department. He is sued in his individual capacity.

17. Defendant David Young was employed by Grundy County, Tennessee and the Grundy County Sheriff's Department. At all material times, Defendant Young acted under color of state law by virtue of his authority as a law enforcement officer for the Grundy County Sheriff's Department. He is sued in his individual capacity.

18. Defendant Joshua Turner was employed by Grundy County, Tennessee and the Grundy County Jail. At all material times, Defendant Turner acted under color of state law by virtue of his authority as a correctional officer for the Grundy County Jail. He is sued in his individual capacity.

19. Defendants **JOHN DOES 1-25** are those persons, firms, corporations or other entities who are in any way responsible to the Plaintiffs for the damages sustained herein and whose identities or precise tortious acts and omissions are at this time unknown or undiscovered. These Defendants will be added by amendment when ascertained, including, but not limited to, those unknown staff members who assisted with the treatment provided to the Plaintiff.

III. Factual Allegations

20. On May 29, 2024, fifty-three (53) year-old Ronnie Ledbetter had driven off of Sherrill Road in Coffee County, Tennessee and struck a pole.

21. At approximately 5:19 a.m. on the morning of May 29, 2024, Brian Gilliam of the Pelham Fire Department noticed Mr. Ledbetter's vehicle on the side of the road. Mr. Gilliam could see that Mr. Ledbetter was unconscious and called 911.

22. First to arrive on the scene were members of the Pelham Fire Department and EMS.

23. Mr. Gilliam then busted the window out of the back passenger door out of Mr. Ledbetter's vehicle. When Mr. Ledbetter came to, he was disoriented and confused by the situation. Greg Shadwick with EMS leaned into Mr. Ledbetter's vehicle for the purpose of placing a cervical collar on Mr. Ledbetter when Mr. Shadwick was

inadvertently poked in the eye under his glasses. Fellow EMS worker Anne King observed that Mr. Ledbetter had no obvious injuries or visible signs of trauma at this time.

24. At this point Mr. Ledbetter had been involved in a motor vehicle accident, had been startled awake by the loud and violent breaking of the glass window of his vehicle, had multiple strangers yelling at him and placing their hands in close proximity to his head and neck, and was disoriented by the trauma of his surroundings.

25. Shortly after Mr. Shadwick was inadvertently poked in the eye dispatch incorrectly relayed to responding Sheriff's Department personal that an EMS worker was punched in the face and that Mr. Ledbetter was extremely combative.

26. Defendant Graham and Defendant Bess were the first deputies from the Grundy County Sheriff's Department on scene and presumably heard the incorrect statement from dispatch.

27. According to witness statements Defendants Graham and Bess immediately upon arrival approached Mr. Ledbetter and without any communication or instructions (i.e. a lawful command to exit the vehicle) to Mr. Ledbetter, started striking him about the head and torso.

28. This violent, unprovoked, and unnecessary attack resulted in Mr. Ledbetter's face beginning to bleed. Mr. Ledbetter was then handcuffed and thrown to the ground. Officers Graham and Bess then inflicted gratuitous and unnecessary strikes to Mr. Ledbetter while he was incapacitated.

29. Defendant Graham's and Bess's actions were so extreme and uncalled for, that onlookers at the scene began protesting the treatment of Mr. Ledbetter and started video tapping their actions. Defendant Graham observed Defendant Bess's actions and had a duty to intervene and stop the assault likewise Defendant Bess observed Defendant Graham's actions and had a duty to intervene and stop the assault. Both of these Defendants observed later Defendants continuing the assault and failed to protect Mr. Ledbetter from the assaults of Defendants Nunley, King, Young, and Turner.

30. After Mr. Ledbetter was placed in handcuffs, he was led by Defendant Graham and Defendant Bess to their patrol car. Defendant Graham and Defendant Bess did not have a cage in their patrol car and had to request an officer with a cage come to transport Mr. Ledbetter to the Grundy County Jail.

31. While waiting for the police car to arrive Mr. Ledbetter's legs gave out and he fell over. Defendant Graham and Defendant Bess continued to yank Mr. Ledbetter up as he struggled to stand from the attack he had sustained from Defendants Graham and Bess. At this point it is obvious that Mr. Ledbetter was:

- i. Incapacitated with his hand cuffed behind his back,
- ii. In medical distress requiring emergency medical assistance as evidenced by his profusely bleeding face and his inability to stand and altered mental status,
- iii. The recipient of unjustifiable, violent, and excessive force at the hands of law enforcement officers, and
- iv. Erroneously arrested and detained by his abusers.

All of these four (4) obvious conditions were the result of the unconstitutional actions of Officers Graham and Bess.

32. The Grundy County Sheriff's Department Policy and Procedures state when a person is combative enough to require leg restraint as well as being handcuffed they are to be placed in patrol car in a position that will not obstruct their breathing, such as on their side or sitting up. However, shortly after Defendant Nunley arrived on scene and found Mr. Ledbetter on his stomach, handcuffed with Defendant Graham and Defendant Bess holding him down in a position that would deprive oxygen.

33. Defendant Nunley, Defendant Graham, and Defendant Bess then forcibly and violently placed Mr. Ledbetter in Defendant Nunley's patrol vehicle while Mr. Ledbetter was in severe medical distress and incapacitated.

34. Defendant Young arrived on scene shortly followed by Defendant King. Mr. Ledbetter was moved to Defendant King's vehicle by Defendant Graham, Defendant Bess, Defendant Young, and Defendant King.

35. Defendants Nunley, Young, and King each witnessed and continued the assault against Mr. Ledbetter.

36. During the transfer to Defendant King's vehicle Mr. Ledbetter was tasered approximately three (3) to four (4) times by Defendant King. The transfer to Defendants King's vehicle was a continuation of the assault perpetrated by Defendants King, Graham, Bess, Nunley, and Young.

37. At approximately 6:04 a.m. Mr. Ledbetter was taken from the scene and transported to the Grundy County Jail by Defendant King followed by Defendant Young.

Transport took approximately 30 minutes at which time Mr. Ledbetter's medical status continued to deteriorate. Contrary to the Policy and Procedure Manual regarding suspect transport, Defendant King continued to the Grundy County Jail instead of bringing Mr. Ledbetter to the Emergency Room for treatment.

38. Defendant King knew or should have known that at the time he was transporting Mr. Ledbetter that he was in a severe medical crisis and Defendant King's refusal to detour to the nearest medical facility constitutes a willful and deliberate indifference to the health and welfare of Mr. Ledbetter.

39. The Grundy County Jail had been placed on notice that Defendant King and Defendant Young were on their way with Mr. Ledbetter. Correctional Officers, Defendant Turner and Malkelm Leffler, were advised to wait outside and help Defendant King and Defendant Young get Mr. Ledbetter into the jail.

40. According to statements from Nurse John Anderson and Mr. Leffler, Mr. Ledbetter was combative and kicking as Defendant Turner, Defendant King, and Defendant Young brought Mr. Ledbetter from the patrol car, through the jail, and to the "M2" cell. However, the security footage from the Grundy County Jail shows three (3) officers dragging a lifeless body through the jail. This was a continuation of the initial assault against Mr. Ledbetter by Defendants King, Young, and Turner.

41. Mr. Ledbetter was drug into the unlight "M2" cell and dropped onto the floor. Shortly thereafter jail medical staff began CPR and called for an ambulance.

42. Mr. Ledbetter's body was then transported by ambulance to the nearest hospital where he was pronounced dead.

43. Though the Grundy County Sheriff's Department's Policy and Procedures states that "deputies shall activate the [body worn camera] to record all contacts with citizens in the performance of official duties" not a single Grundy County officer activated a body camera when dealing with Mr. Ledbetter.

44. The actions of the individual Defendants as stated above caused extreme, almost unfathomable, pain and suffering to Ronnie Ledbetter prior to his death. Mr. Ledbetter sustained multiple beatings, was held down in a position where he could not adequately breath, was tased multiple times, and was denied lifesaving medical care. Mr. Ledbetter's body was riddled with dozens of lacerations and severe contusion as well as twelve (12) broken ribs.

45. The initial 911 call by Brian Gilliam, initiated with the intent to ensure Mr. Ledbetter's safety and well-being, tragically became the catalyst for his demise.

46. All acts of the individual Defendants involved in this incident were performed under the color and pretense of the constitutions, statutes, ordinances, regulations, customs and usages of the United States of America and the State of Tennessee, under the color of law and by virtue of their authority as law enforcement officers, and in the course and scope of their employment as law enforcement officers.

47. The acts of violence against Mr. Ledbetter, administration of excessive force, and the disregard for the safety and wellbeing of Mr. Ledbetter were carried out as a routine practice of the Grundy County Sheriff's Department, and consistent with the training and supervision by Defendant Sheriff Heath Gunter and amount to violations of Mr. Ledbetter's constitutionally protected right to be free from excessive force.

COUNT I - EXCESSIVE FORCE

48. Plaintiff re-alleges and incorporates all paragraphs in this Complaint as if fully stated herein.

49. Defendants Graham, Bess, King, Nunley, Young, and Turner's acts of beating, restraining, tasering, and/or dragging were an objectively unreasonable, unnecessary, and excessive use of force that constituted punishment and was not rationally related to a legitimate nonpunitive governmental purpose or was excessive in relation to such purpose.

50. Defendants Graham, Bess, King, Nunley, Young, and Turner acted under color of law to deprive Mr. Ledbetter of his right to be free of excessive force, and this amounts to punishment pursuant to the Fourteenth Amendment to the Constitution of the United States and by 42 U.S.C. § 1983.

51. Mr. Ledbetter's right to be free from excessive force in the manner described in this Complaint was clearly established at the time the force was used and the Defendants knew or should have known that the excessive force articulated in this Complaint was a violation of Mr. Ledbetter's constitutionally protected rights.

52. As a direct and proximate result of the acts of Defendants Graham, Bess, King, Nunley, Young, and Turner, Mr. Ledbetter suffered severe mental and physical pain and suffering and injury prior to his death.

53. Defendants Graham, Bess, King, Nunley, Young, and Turner are jointly and severally liable for the excessive force used on Ronnie Ledbetter because they acted

jointly and in conspiracy with one another to cause the harms described herein, which constituted excessive force.

54. The acts and omissions of Defendants Graham, Bess, King, Nunley, Young, and Turner complained of herein were unlawful, conscious shocking and unconstitutional and performed maliciously, recklessly, fraudulently, intentionally, willfully, wantonly and in such a manner as to entitle the Plaintiff to an award of punitive damages.

55. Defendant Heath Gunter as the Sheriff of the Grundy County Sheriff's Department directly oversaw hiring, retention, training, and supervision of every named defendant contained within this complaint and is therefore responsible for their conduct as well as his failure to prevent damages inflicted upon Mr. Ledbetter from occurring.

56. Plaintiff is entitled to recovery of costs, including reasonable attorneys' fees under 42 U.S.C. § 1988.

COUNT II - FAILURE TO PROTECT

57. Plaintiff re-alleges and incorporate all paragraphs in this Complaint as if expressly stated herein.

58. Defendants Gunter, Graham, Bess, King, Nunley, Young, and Turner observed or had reason to know that excessive force would be (or was being) used by the other individual Defendants, and as such, they had both the opportunity and the means to prevent the harm from occurring and from continuing to occur.

59. There was sufficient time during the incident described to stop other individual Defendants from the continued use of excessive force. Nevertheless, not only

did each individual Defendant fail to take any action to stop the excessive force, but each individual Defendant also actively participated in the excessive force.

60. The individual Defendants are liable for failing to protect Mr. Ledbetter from each other's excessive and unnecessary force because they each owed Mr. Ledbetter a duty of protection against such use of excessive force. Specifically, each officer was directed by the Grundy County Policy and Procedure Manual that, "The care, custody, control, and safety of a suspect is the sole responsibility of the arresting officer... Arresting officers are required to protect suspects from other suspects, victims, fellow officers, and self-inflicted injuries."

61. The failure to protect Mr. Ledbetter from excessive force was a violation of his Fourteenth Amendment rights and was clearly established at such time through then existing case law and the Sheriff's Department's own Policy and Procedure Manual.

62. As a direct and proximate result of the individual Defendants' failure to protect Mr. Ledbetter from excessive force and their deliberate indifference in providing immediate medical attention, Mr. Ledbetter suffered severe harm including pain and suffering and ultimately death.

63. Defendant Gunter failed to protect Mr. Ledbetter by creating a policy, practice, and custom of employing untrained and inadequately supervised deputies as well as failing to address a history of constitutional violations by his officers.

64. The actions and omissions of the individual Defendants complained of herein were unlawful, conscience-shocking, and unconstitutional. Moreover, they were

performed maliciously, recklessly, intentionally, willfully, wantonly, and in such a manner as to entitle the Plaintiff to an award of punitive damages.

65. Plaintiff is entitled to recovery of costs, including reasonable attorneys' fees under 42 U.S.C. § 1988.

COUNT III - 42 U.S.C. § 1983 - Monell Liability

66. Plaintiff hereby incorporates and re-alleges all preceding paragraphs in this Complaint as if expressly stated herein.

67. The unconstitutional policies, practices, and customs of Sheriff Heath Gunter and Grundy County were the direct and proximate cause of Mr. Ledbetter's death. These policies, which Grundy County knowingly tolerated, included the deployment of untrained, uncertified, and inadequately supervised deputies, as well as a failure to address repeated constitutional violations despite notice to municipal policymakers.

68. There have been repeated complaints of constitutional violations known to the municipal policymakers which they have failed to correct and could have corrected with appropriate training.

69. To support these allegations, Plaintiffs rely on the following facts:

70. On September 22, 2022, Alexander Stock was detained for forty-five (45) minutes and frisked by a Grundy County Sheriff's Deputy for a minor speeding violation. The deputy justified these actions as "protocol," demonstrating a pattern of unconstitutional practices within the Sheriff's Department.

71. On August 1, 2023, Mary Wockasen was arrested by a Grundy County Sheriff's Deputy who lacked a high school diploma or General Educational Development (GED) certificate, a mandatory requirement for police officer certification in Tennessee. This incident exemplifies Grundy County's practice of hiring unqualified personnel.

72. The Grundy County Sheriff's Department and Sheriff Gunter have faced repeated investigations by the Tennessee Peace Officer Standards & Training (P.O.S.T.) Commission for employing unlicensed, untrained, or uncertified deputies. Hearings were held on July 21, 2023; August 18, 2023; October 20, 2023; September 19, 2024; October 17, 2024; and January 16, 2025. At the August 18, 2023, hearing, Sheriff Gunter admitted to deploying uncertified and untrained officers on patrols, citing a staffing shortage after twenty-three (23) employees resigned upon his assumption of office.

73. Since Sheriff Gunter took office, at least six (6) Grundy County Sheriff's Department officers have been placed on the Brady/Giglio List maintained by the District Attorney General for Tennessee's 12th Judicial District, indicating credibility issues. Most of these officers remain employed by Grundy County with minimal or no disciplinary action, reflecting a custom of tolerating misconduct.

74. The hiring of Defendant Jayven Bess, a nineteen (19)-year-old deputy with inadequate training and supervision, further illustrates Grundy County's deficient policies. These shortcomings directly contributed to the events leading to this lawsuit.

75. Upon information and belief none of the individual Defendants were terminated, suspended, disciplined, or retrained. The absence of any corrective action

after Mr. Ledbetter's death indicates approval of the conduct of the individual Defendants by Sheriff Gunter, Grundy County, and other municipal policymakers.

76. As a direct and proximate result of the acts and omissions described herein, Mr. Ledbetter and Mr. Ledbetter's estate, namely his children, have suffered compensatory and special damages as defined under federal common law and in an amount to be determined by a jury.

77. As a direct and proximate result of these wrongful acts and omissions, the Plaintiffs have suffered a pecuniary loss, including medical and funeral expenses, and other compensatory damages to be determined by the jury.

78. The actions and omissions of the individual Defendants complained of herein were unlawful, conscience-shocking, and unconstitutional. Moreover, they were performed maliciously, recklessly, intentionally, willfully, wantonly, and in such a manner as to entitle the Plaintiff to an award of punitive damages.

79. Plaintiffs are entitled to recover their costs, including reasonable attorneys' fees under 42 U.S.C. § 1988.

COUNT IV - 42 U.S.C. § 1983 - Canton Liability

80. Plaintiff hereby re-alleges and incorporates all paragraphs in the Complaint as if expressly stated herein.

81. Defendant Grundy County failed to properly train or modify its training for Defendant officers and for its other officers, including but not limited to, (1) matters related to the reasonable and appropriate use of force during such encounters, (2) intervention in the excessive force by fellow officers including their duty to protect, (3)

the identification of medical emergencies in suspects, and (4) the appropriate care to be provided to suspects including the requirement to transport suspects to a medical facility.

82. Using force to effectuate an arrest, intervening in the use of force by fellow officers, identifying medical emergencies in suspects, and the appropriate care to be provided to suspects including the requirement to transport suspects to a medical facility are usual and recurring situations with which officers of Grundy County Sheriff's Department encounter on a regular basis. As such, Defendant Grundy County was aware of a need for basic and advanced training in these areas.

83. Defendant Grundy County was aware that deprivation of the constitutional rights of citizens was likely to result from its lack of training and the failure to modify its training. As such, Defendant Grundy County was deliberately indifferent and exhibited reckless disregard with respect to the potential violation of constitutional rights. Further, Defendant Grundy County's failure to train reflects a conscious choice and policy by a municipality to the detriment of Mr. Ledbetter.

84. The failure to train and/or modify training constituted official policies, customs, usages, or practices of Defendant Grundy County.

85. Defendant Grundy County's respective failures to train and/or modify training were behind the acts and omissions the Defendant officers made toward Mr. Ledbetter.

86. As a direct and proximate result of Defendant Grundy County's acts and omissions, Mr. Ledbetter suffered injuries, experienced pain & suffering, and ultimately died.

87. As a direct and proximate result of the acts and omissions described herein, Mr. Ledbetter and, by extension, Plaintiffs suffered compensatory and special damages as defined under federal common law and in an amount to be determined by jury.

88. The actions and omissions of the individual Defendants complained of herein were unlawful, conscience-shocking, and unconstitutional. Moreover, they were performed maliciously, recklessly, intentionally, willfully, wantonly, and in such a manner as to entitle the Plaintiff to an award of punitive damages.

89. Plaintiffs are entitled to recovery of costs, including reasonable attorneys' fees under 42 U.S.C. § 1988.

COUNT V - STATE LAW CLAIM FOR NEGLIGENCE

90. Plaintiffs re-allege and incorporate all paragraphs in this Complaint as if expressly stated herein.

91. In addition to the above federal law claims, Plaintiffs asserts claims pursuant to the Tennessee Governmental Tort Liability Act, Tenn. Code Ann. § 29-20-101 *et seq.*

92. Defendant Grundy County and the individual Defendants owed a duty of due care to Mr. Ledbetter to refrain from handling him in a negligent fashion that could, would, and ultimately did cause injury and death to him.

93. The use of excessive force, the failure to protect, and the failure to identify a medical crisis and render appropriate care were breaches of the above-mentioned duty of care owed to Mr. Ledbetter. Moreover, as a direct and proximate result of said breach, Mr. Ledbetter suffered and died and the Plaintiffs suffered the loss of consortium, society,

companionship, guidance, love and affection and services of Mr. Ledbetter and is entitled to a judgment against the Defendant for compensatory damages arising as the result of such loss of consortium.

94. The actions and omissions of the individual Defendants complained of herein were unlawful, conscience-shocking, and unconstitutional. Moreover, they were performed maliciously, recklessly, intentionally, willfully, wantonly, and in such a manner as to entitle the Plaintiff to an award of punitive damages.

PRAYER FOR RELIEF

1. That process issue to the Defendants and that they be required to answer in the time required by law;
2. That judgment be rendered in favor of the Plaintiffs and against the Defendant on all causes of action asserted herein;
3. That Plaintiffs be awarded those damages to which they are entitled by proof submitted in this case for the pain and suffering endured by Ronnie Ledbetter prior to his death, funeral expenses incurred and the pecuniary value of the life of Ronnie Ledbetter as the result of the violation of his rights as guaranteed by the Fourteenth Amendment to the Constitution of the United States;
4. That punitive damages be assessed against the individual Defendants;
5. That the Plaintiffs be awarded reasonable expenses including reasonable attorney's fees and expert fees and discretionary costs pursuant to 42 U.S.C § 1988 (b) and (c);

6. That the Plaintiffs be awarded all damages allowable for their stated cause of action for wrongful death pursuant to Tenn. Code Ann. § 20-5-113 up to the limits provided by Tenn. Code Ann. § 29-20-403;
7. That Defendants be held jointly and severally liable for all damages;
8. That the Plaintiffs receive any other further and general relief to which they may be entitled; and
9. That a jury of eight (8) is demanded.

Respectfully Submitted,

/s/ David J. McKenzie
DAVID J. MCKENZIE #025563
The Law Office of David McKenzie
205 West Commerce Street
Lewisburg, TN 37091
931-359-7305 / 931-422-5154 (fax)
david@davidmckenzielaw.com

/s/ Debbie Z. Boudreaux
DEBBIE Z. BOUDREAUX #030416
The Law Office of David McKenzie
205 West Commerce Street
Lewisburg, TN 37091
931-359-7305 / 931-422-5154 (fax)
debbie@davidmckenzielaw.com

/s/ Savannah B. Oliver
SAVANNAH B. OLIVER #039367
The Law Office of David McKenzie
205 West Commerce Street
Lewisburg, TN 37091
931-359-7305 / 931-422-5154 (fax)
savannah@davidmckenzielaw.com

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth,)
 as surviving children and next of kin of Ronnie Glenn)
 Ledbetter)
)
)
 Plaintiff(s))
 v.)
)
 Grundy County, TN; Heath Gunter, Justin Graham,)
 Jayven Bess, Kenneth Nunley, Brandon King, and)
 David Young, in their individual capacities as officers of)
 the Grundy County Sheriff's Department; Joshua Turner)
 in his individual capacity as correctional officer for)
 the Grundy County Jail.)
 Defendant(s))
 Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Deputy Jayven Bess
 c/o Grundy County Sheriff's Department
 62 Spring Street
 Altamont, TN 37301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

David J. McKenzie
 The Law Firm of David J. McKenzie
 205 W Commerce, Lewisburg, TN 37091
 Phone: (931) 359-7305
 Fax: (931) 422-5154

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth,)
as surviving children and next of kin of Ronnie Glenn)
Ledbetter)
)
)
Plaintiff(s))
v.) Civil Action No.
Grundy County, TN; Heath Gunter, Justin Graham,)
Jayven Bess, Kenneth Nunley, Brandon King, and)
David Young, in their individual capacities as officers of)
the Grundy County Sheriff's Department; Joshua Turner)
in his individual capacity as correctional officer for)
the Grundy County Jail.)
Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Deputy Justin Graham
c/o Grundy County Sheriff's Department
62 Spring Street
Altamont, TN 37301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

David J. McKenzie
The Law Firm of David J. McKenzie
205 W Commerce, Lewisburg, TN 37091
Phone: (931) 359-7305
Fax: (931) 422-5154

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____ *Server's signature*

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth,)
as surviving children and next of kin of Ronnie Glenn)
Ledbetter)
)
)
Plaintiff(s))
v.) Civil Action No.
Grundy County, TN; Heath Gunter, Justin Graham,)
Jayven Bess, Kenneth Nunley, Brandon King, and)
David Young, in their individual capacities as officers of)
the Grundy County Sheriff's Department; Joshua Turner)
in his individual capacity as correctional officer for)
the Grundy County Jail.)
Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Sheriff Heath Gunter
c/o Grundy County Sheriff's Department
62 Spring Street
Altamont, TN 37301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

David J. McKenzie
The Law Firm of David J. McKenzie
205 W Commerce, Lewisburg, TN 37091
Phone: (931) 359-7305
Fax: (931) 422-5154

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
for the
Eastern District of Tennessee

Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth,
as surviving children and next of kin of Ronnie Glenn)
Ledbetter)
)
)
)
Plaintiff(s))
v.) Civil Action No.
Grundy County, TN; Heath Gunter, Justin Graham,
Jayven Bess, Kenneth Nunley, Brandon King, and
David Young, in their individual capacities as officers of
the Grundy County Sheriff's Department; Joshua Turner
in his individual capacity as correctional officer for
the Grundy County Jail.)
Defendant(s))

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Sgt. Brandon King
c/o Grundy County Sheriff's Department
62 Spring Street
Altamont, TN 37301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

David J. McKenzie
The Law Firm of David J. McKenzie
205 W Commerce, Lewisburg, TN 37091
Phone: (931) 359-7305
Fax: (931) 422-5154

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____ *Server's signature*

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth,
as surviving children and next of kin of Ronnie Glenn
Ledbetter

Plaintiff(s)

v.

Grundy County, TN; Heath Gunter, Justin Graham,
Jayven Bess, Kenneth Nunley, Brandon King, and
David Young, in their individual capacities as officers of
the Grundy County Sheriff's Department; Joshua Turner
in his individual capacity as correctional officer for
the Grundy County Jail.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Deputy Kenneth Nunley
c/o Grundy County Sheriff's Department
62 Spring Street
Altamont, TN 37301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

David J. McKenzie
The Law Firm of David J. McKenzie
205 W Commerce, Lewisburg, TN 37091
Phone: (931) 359-7305
Fax: (931) 422-5154

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
for the
Eastern District of Tennessee

Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth,)
as surviving children and next of kin of Ronnie Glenn)
Ledbetter)
)
)
Plaintiff(s))
v.) Civil Action No.
Grundy County, TN; Heath Gunter, Justin Graham,)
Jayven Bess, Kenneth Nunley, Brandon King, and)
David Young, in their individual capacities as officers of)
the Grundy County Sheriff's Department; Joshua Turner)
in his individual capacity as correctional officer for)
the Grundy County Jail.)
Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Joshua Turner
c/o Grundy County Sheriff's Department
62 Spring Street
Altamont, TN 37301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

David J. McKenzie
The Law Firm of David J. McKenzie
205 W Commerce, Lewisburg, TN 37091
Phone: (931) 359-7305
Fax: (931) 422-5154

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____ *Server's signature*

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
for the
Eastern District of Tennessee

Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth,
as surviving children and next of kin of Ronnie Glenn)
Ledbetter)
)
)
Plaintiff(s))
v.) Civil Action No.
Grundy County, TN; Heath Gunter, Justin Graham,
Jayven Bess, Kenneth Nunley, Brandon King, and
David Young, in their individual capacities as officers of
the Grundy County Sheriff's Department; Joshua Turner)
in his individual capacity as correctional officer for)
the Grundy County Jail.)
Defendant(s)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Deputy David Young
c/o Grundy County Sheriff's Department
62 Spring Street
Altamont, TN 37301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

David J. McKenzie
The Law Firm of David J. McKenzie
205 W Commerce, Lewisburg, TN 37091
Phone: (931) 359-7305
Fax: (931) 422-5154

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth,)
 as surviving children and next of kin of Ronnie Glenn)
 Ledbetter)
)
)
 Plaintiff(s))
 v.)
 Grundy County, TN; Heath Gunter, Justin Graham,)
 Jayven Bess, Kenneth Nunley, Brandon King, and)
 David Young, in their individual capacities as officers of)
 the Grundy County Sheriff's Department; Joshua Turner)
 in his individual capacity as correctional officer for)
 the Grundy County Jail.)
 Defendant(s))

Civil Action No. _____

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Grundy County, Tennessee
 Michael Brady, Mayor of Grundy County
 68 Cumberland Street
 Altamont, TN 37301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

David J. McKenzie
 The Law Firm of David J. McKenzie
 205 W Commerce, Lewisburg, TN 37091
 Phone: (931) 359-7305
 Fax: (931) 422-5154

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____ *Server's signature*

Printed name and title

Server's address

Additional information regarding attempted service, etc:

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Amber Baltimore, Taylor Ledbetter, and Cody Ainsworth, as surviving children and next of kin of Ronnie Glenn Ledbetter

(b) County of Residence of First Listed Plaintiff Bedford County, TN
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Law Office of David McKenzie
205 West Commerce Street
Lewisburg, TN 37091

DEFENDANTS

County of Residence of First Listed Defendant Grundy County, TN
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF	PTF	DEF	
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="checkbox"/> PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> REAL PROPERTY <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> CIVIL RIGHTS <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
			SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
			FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
			IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	

V. ORIGIN (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify)	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File
---	---	--	---	--	--	---

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. Section 1983

VI. CAUSE OF ACTION

Brief description of cause:
Wrongful death by excessive force and resultant death of Ronnie Glenn Ledbetter

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION
UNDER RULE 23, F.R.Cv.P.

DEMAND S

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

/s/ David J. McKenzie /s/ Debbie Z. Boudreaux /s/ Savannah B. Oliver

FOR OFFICE USE ONLY

RECEIPT #

Case 1:25-cv-00174-TRM-CHS

AMOUNT

APPLYING IFP

#:

Filed 05/27/25 JUDGE

Page 1 of 1

MAG. JUDGE

PageID