

**CIRCUIT COURT FOR HAMILTON COUNTY
State of Tennessee**

SHANDLE MARIE RILEY,

 Plaintiff,

~v~

HAMILTON COUNTY
GOVERNMENT,

DEPUTY DANIEL WILKEY,
In his capacity as a deputy sheriff
for Hamilton County Government and
in his individual capacity,


DEPUTY JACOB GOFORTH,
In his capacity as a deputy sheriff
for Hamilton County Government and
in his individual capacity,

Defendants.

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No. 19C1101

JURY DEMAND

FILED IN OFFICE
Oct 1
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COMPLAINT

PLAINTIFF, for her causes of action, will show the Court:

Introduction:

1. This is an action for money damages brought pursuant to 42 U.S.C. §§ 1983 and 1988 to redress the deprivation of rights secured to Plaintiff by the First, Fourth, and Fourteenth Amendments to the United States Constitution and for violations of the laws of the State of Tennessee by the Defendants.

2. Plaintiff further brings this action against the Defendant, Hamilton County Government ("County") pursuant to TENN. CODE ANN. § 8-8-302.

3. Plaintiff avers that the individually named defendant, Deputy Daniel Wilkey ("Wilkey"), acted as a deputy sheriff, agent, and law enforcement officer employed by the

County and was at all times relevant to this matter acting under color of law and under color of his office with the County.

4. Plaintiff avers that the individually named defendant, Deputy Jacob Goforth (“Goforth”), acted as a deputy sheriff, agent, and law enforcement officer employed by the County and was at all times relevant to this matter acting under color of law and under color of his office with the County.

5. Plaintiff maintains that the individual Defendants committed these violations, further set forth herein, as a result of policies, customs, practices, and/or procedures of the County.

6. In addition, Plaintiff avers that individual Defendants’ acts and omissions subjected Plaintiff to mental anguish, humiliation, and emotional distress.

Jurisdiction and Venue:

7. This is an action to redress the deprivation of rights secured to Plaintiff by the First, Fourth, and Fourteenth Amendments to the United States Constitution and for violations of Tennessee common law. Thus, as to the § 1983 claims, this Court is vested with original jurisdiction pursuant to the authority stated in Haywood v. Drown, 556 U.S. 729 (2009) and Poling v. Goins, 713 S.W.2d 305, 306 (Tenn. 1986). This Court is vested with original jurisdiction over Plaintiff’s state claims pursuant to TENN. CODE ANN. § 16-10-101, et seq.

8. Venue is proper in this Court pursuant to TENN. CODE ANN. § 20-4-102. All acts complained of occurred within Hamilton County.

a. Plaintiff is a resident of Hamilton County, Tennessee.