

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE

MAXWELL JARNAGIN

DOCKET NO. 19C1397

PLAINTIFF

V.

JURY DEMAND

**DANIEL WILKEY AND HAMILTON
COUNTY, TENNESSEE**

DIVISION _____

DEFENDANTS

COMPLAINT

Now comes Maxwell Jarnagin (Jarnagin), in his individual capacity and in his capacity as Class Representative, and sues the defendants, Hamilton County, Tennessee (Hamilton County) and Daniel Wilkey (Wilkey) and for his cause of action shows the following:

1. Jarnagin is a citizen and resident of Hamilton County, Tennessee.
2. Hamilton County is a governmental entity in the State of Tennessee.
3. Wilkey was, at all times material, a Hamilton County Sheriff's Deputy and employee of the Hamilton County Sheriff's Department.
4. This action is brought pursuant to Tenn. Code Ann. § 8-8-101 et. seq. (the State claim) and 42 U.S.C. §§ 1983 and 1988 (the Federal Claim) and pursuant to Tenn. R. Civ. P. 23 (Class Action).
5. The Class is further defined hereafter.
6. All actions complained of were carried out by Wilkey under color of office and under color of law.

7. All actions complained were undertaken by Wilkey in the scope of his employment as a Sheriff's deputy by Hamilton County.

8. All actions complained of were intentional acts.

9. The damages suffered by Jarnagin and the members of the Class were proximately caused and caused in fact by Wilkey's unlawful actions.

10. Jurisdiction and venue are proper in the Court. This Court has jurisdiction of all claims brought pursuant to Tenn. Code Ann. § 8-8-101 et. seq. and Tenn. Code Ann. § 16-10-101. Venue is proper pursuant to Tenn. Code Ann. § 20-4-102.

11. This Court has supplemental jurisdiction to hear all claims brought pursuant to 42 U.S.C. §§ 1983 and 1988 – see Haywood v. Drown, 5556 U.S. 729 (2009), Walker v. White, 89 S.W. 3d 573 (Tenn. App. 2002).

12. Venue is proper according to common law (see O'Neal v. Dekalb, 531 S.W. 2d 296 (Tenn. 1975)) and pursuant to Tenn. Code Ann. § 20-4-102.

I. FACTS

13. On March 30, 2019 at approximately 8:00 P.M. Jarnagin was travelling in a car in the 12500 block of Dayton Pike in north Hamilton County, Tennessee.

14. The car in which Janargin was travelling was stopped by a Hamilton County Deputy.

15. The 12500 block of Dayton Pike is a sparsely populated, isolated location.

16. At, or shortly after the stop, Wilkey joined two Hamilton County Sheriff's deputies – Tyler McRea and Jacob Goforth.

17. After the car was stopped, Jarnagin was ordered out of the car by Wilkey and told to stand in front of Wilkey's police car.

18. Wilkey handcuffed Jarnagin.

19. While in front of Wilkey's police car and after he initially "patted down" Jarnagin, Wilkey put his hand down (inside) the front of Jarnagin's trousers and inappropriately touched Jarnagin's genitals.

20. Jarnagin did not consent to the unlawful touching of his genitals by Wilkey.

21. The fondling of Jernigan's genitals served no recognized police policy.

22. The unlawful touching of Jernigan's genitals by Wilkey was the proximate cause and cause in fact of Jarnagin's injuries; these injuries include, but are not limited to, emotional and psychological pain and suffering, humiliation and fear.

II. THE CLASS

23. Jarnagin brings this action in his individual capacity and as representative plaintiff (Class Representative) for the Class pursuant to Tenn. R. Civ. P. 23

24. The proposed Class is made up of all those who were unlawfully, physically and/or sexually assaulted by Wilkey. Wilkey was, at all times material, a Hamilton County Sheriff's Deputy. The Class Representative and each member of the Class hold claims that arose in Hamilton County, Tennessee. Further factors supporting the certification of the Class include the following:

i) Numerosity

25. The Class is so numerous that joinder of each member's claim would prove impactable. Although the exact number of Class members has not yet been determined, it is believed to be well over 50. Wilkey was employed by the Hamilton County Sheriff for approximately two years. Based upon a review of some of the known incidents, it appears that such incidents may have occurred several times a week on average. The

joinder of over fifty separate lawsuits would be extremely burdensome for the attorneys, their clients, the judges whose time and resources are limited and the clerks, staff and personnel of the Court. Certification of the Class will support judicial economy.

ii) Commonality - common questions of law and fact.

26. There are questions of fact which are common to the Class Representative and each member of the Class, including the following:

- a. Each was travelling in a car or other vehicle on a public road in Hamilton County when the incident forming the basis of their claims began.
- b. Each was assaulted by Wilkey.
- c. Each was ordered out of the vehicle and ordered to stand in front of Wilkey.
- d. Each had a duty by law to obey Wilkey and each was subject to arrest for disobeying him.
- e. Each was unlawfully physically and/or sexually assaulted by Wilkey.
- f. Each must show that the assault was not consented to.
- g. Each suffered the humiliation of being assaulted by a stranger in public.
- h. Each suffered the humiliation of being assaulted by Wilkey who had authority and exercised power over them.
- i. Each suffered injuries and damages as a result of Wilkey's unlawful actions.

27. There are questions of law common to the Class Representative and each member of the Class including the following:

- a. Each must prove they were unlawfully physically and/or sexually assaulted by a Hamilton County Sheriff's Deputy who was acting under "color of office" and under "color of law."
- b. Each must prove that the assault that injured them occurred within the scope and in the course of Wilkey's official duties under color of law and color of office.
- c. Each must prove that the assault was not consented to.
- d. Each must prove that the assault was not justified by any law enforcement principal.
- e. Each must prove that Hamilton County acted with deliberate disregard of their constitutionally protected rights.
- f. Each must show that the training Hamilton County provided to Wilkey was deficient in a way that led to or allowed Wilkey's unlawful behavior and/or that Hamilton County failed to properly supervise Wilkey in a way that allowed him to assault his victims.
- e. Each must show that their injuries were caused in fact by Wilkey and Hamilton County.
- f. Each must show that their injuries were proximately caused by Wilkey and Hamilton County.
- g. Each must prove a basis for Hamilton County's liability other than respondeat superior; that is, each must prove that Hamilton County does not enjoy immunity from their claims.

h. Each must prove their damages using the same legal methodology.

ii) Typicality

28. The Class Representative's claim is typical to the Class. His claim, as well as the claims of each member of the Class, is based upon the actions of one Sheriff's Deputy and each was the result of the same course of conduct by Wilkey. Each claim is based upon the same legal theories and the same kind and character of injury.

1. Fair representation.

29. The Class Representative will fairly and adequately represent the Class members. As shown above, there are abundant common factual and legal issues within the claims of the Class Representative and the members of the Class which show that there are common interests shared by the Class Representatives and the members of the Class. The Class Representative's interests and motivations are such that he will vigorously prosecute the case on his behalf as well as on behalf of all of the members of the Class.

30. The Class Representative and the Class will be represented by qualified attorneys. John C. Cavett, Jr. and Rip Biggs are licensed attorneys and both are experienced criminal defense lawyers with knowledge of the Hamilton County Sheriff's operations and personnel. Each has established ties and relationships with the Hamilton County District Attorney General and his assistants. Each is familiar with the rules and regulations that Hamilton County Sheriff's Deputies are subject to.

31. John C. Cavett, Jr. has specialized experience in both civil rights cases and Class action cases. John C. Cavett, Jr. has filed cases under 42 USC 1983 in Hamilton County (several), McMinn County and Anderson County, Tennessee. He has also filed

two Class action cases in the state Courts of Hamilton County, Tennessee. He has been admitted to practice in the State of Tennessee since October, 1981 and has been admitted to practice in the Federal Court for the Eastern District of Tennessee since November, 1982; he is also licensed to practice in the 6th Circuit Court of Appeals and the United States Supreme Court. He has extensive experience representing clients in both criminal and civil cases in the Federal Court for the Eastern District of Tennessee and in the state courts of Marion, Sequatchie, Bledsoe, McMinn and Knox Counties in Tennessee and others. He has extensive experience representing clients in criminal and civil cases in the Federal Court for the Eastern District of Tennessee, the Northern District of Georgia and the Northern District of Florida. Rip Biggs is an experienced attorney trying cases in both civil and criminal Court. He is co-counsel in a civil rights case pending in McMinn County, Tennessee. He has practiced law since 2013 in state court in Hamilton County, Tennessee, the Federal Court for the Eastern District of Tennessee and in Marion, Sequatchie and other Tennessee counties.

2. Predominance.

32. The Class is sufficiently cohesive to warrant adjudication by representation. Each member of the Class may be entitled to a different amount of damages based upon his or her particular experience and therefore may require some individualized proof; however, the methodology of proving the damages of each is the same. Otherwise, the proof needed to establish each claim will be essentially the same for the Class Representative each member of the Class. Both the factual and legal issues shared by the Class Representative and each member of the Class are subject to generalized proof and the common questions predominate over individual ones.

3. Superiority.

33. A Class action suit is superior to any other available method for fairly and efficiently adjudicating the claims. A Class action will achieve economies of scale, time effort and expense and will result in a uniformity of decision as to all members.

4. Humiliation and embarrassment.

34. Being sexually assaulted by a Sheriff's deputy in a public place, and in most instances knowing that the assault was captured on video camera, is humiliating and embarrassing for many people. Many are unwilling or unable to testify in open Court about what happened to them. In most cases, this stigma is sufficient to cause victims to forego making a public claim for damages to which they are entitled. If the Class is certified, none of the Class members will be required to appear in open Court, yet each will be entitled to a judgment for damages if the suit is successful. The Class members' rights of privacy may be further protected by confidentiality orders if need be.

35. If the Class is not certified, many, and perhaps most, of the members of the Class may forego their right to assert a claim in order to safeguard their privacy. A Class action is the only way these members may ever obtain a recovery for their injuries.

36. The Class Representative is aware that he will be the public face of the Class. He knows that there may be significant publicity associated with the case and that the whole matter will likely be linked to his name alone. Despite this, he is ready, willing and able to act as the representative of the Class.

III. THE INDICTMENT

37. On December 10, 2019 Wilkey was indicted by a Hamilton County Grand Jury. The indictment contains 44 counts. The indictment addressed crimes committed against 4 individual victims and 16 counts addressed crimes committed by Wilkey

against “various persons” and “other persons.” A copy of the indictment is attached hereto as “Exhibit 1.”

38. Counts 21 – 24 address crimes against Jarnagin, the Class Representative. Count 21 charges Wilkey with False Imprisonment against Jarnagin in violation of Tenn. Code Ann. § 39-13-302. Count 22 charges Wilkey with Assault against Jarnagin in violation of Tenn. Code Ann. § 39-13-101. Count 23 charges Wilkey with Official Oppression against Jarnagin in violation of Tenn. Code Ann. § 39-16-403. Count 24 charges Wilkey with Rape against Jarnagin in violation of Tenn. Code Ann. § 39-13-501. The crimes against Jarnagin occurred on March 30, 2019.

39. Counts 1 – 6 and 24-27 charge Wilkey with False Imprisonment, Assault, Official Oppression and Rape against 3 other individuals.

40. Counts 27 – 44 charge Wilkey with Reckless Endangerment in violation of Tenn. Code Ann. § 39-13-103 and Reckless Driving in violation of Tenn. Code Ann. § 55-10-205 against “various individuals” and “other persons” which occurred on January 4, 2019, May 16, 2019, June 6, 2019, June 8, 2019, June 12, 2019, June 21, 2019 June 22, 2019, June 23, 2019 and July 3, 2019.

IV. STATE CAUSE OF ACTION

41. This cause of action, asserted by Jarnagin individually and on behalf of the Class, is brought pursuant to Tenn. Code Ann. § 8-8-301 et. seq.

42. Among the duties of the Sheriff is the following provided by Tennessee law:

Tenn. Coded Ann. § 8-8-101(34)

Enforce the ordinances of a municipality; provided, that the municipality has expressed by ordinance its intent to have the sheriff enforce its ordinances, and that the municipality has filed a

certified copy of its ordinances with the sheriff and the general sessions court of the county;

43. Tennessee law provides that the Sheriff is not responsible or liable for the acts of his deputies:

Tenn. Code Ann. § 8-8-301

(a) No sheriff, whether elected or appointed, nor any surety on the sheriff's bonds, shall be liable for any wrongs, injuries, losses, damages or expenses incurred as a result of any act or failure to act on the part of any deputy appointed by the sheriff, whether the deputy is acting by virtue of office, under color of office or otherwise.

44. Tennessee law provides that while the Sheriff is not liable for the acts of his deputies; the county he serves is liable for his deputy's actions.

Tenn. Code Ann. § 8-8-802.

Anyone incurring any wrong, injury, loss, damage or expense resulting from any act or failure to act on the part of any deputy appointed by the sheriff may bring suit against the county in which the sheriff serves; provided, that the deputy is, at the time of such occurrence, acting by virtue of or under color of the office.

45. Wilkey was, at all times material, serving as an appointed deputy in Hamilton County.

46. Wilkey's acts, as described above, were undertaken by him by virtue of and under color of the office and color of law.

47. Wilkey's acts, as described above, resulted in damages to Jarnagin and to members of the Class.

48. The injuries suffered by Jarnagin and the members of the Class were proximately caused and caused in fact by Wilkey.

49. Jarnagin and each member of the Class are entitled to recover damages for Wilkey's actions against Hamilton County.

V. FEDERAL CAUSE OF ACTION

I. Preliminary Statement

50. This is a civil rights Class action based upon the actions of Wilkey and Hamilton County. Wilkey's actions include physically and/or sexually assaulting detainees and/or arrestees who were under his control and supervision.

51. Hamilton County was, at all times material, deliberately indifferent to the violation of the Class Representative's and the Class members' constitutional rights at the hands of its employee - Wilkey.

52. At all times material Wilkey was an employee of Hamilton County and all acts by Wilkey were undertaken as part of his official duties. The injuries suffered by the Class Representative and members of the Class were proximately caused and caused in fact by Wilkey and Hamilton County.

53. Hamilton County followed a pattern, custom or practice that allowed Wilkey to assault the Class Representative and the members of the Class in violation to their constitutional rights.

54. Hamilton County's training and supervision of Wilkey, and other deputies, was deficient in a way that allowed Wilkey to assault his victims.

55. The actions and inactions of Hamilton County demonstrate a deliberate disregard of the constitutional rights of the Class Representative and members of the Class.

II. Jurisdiction and Venue

56. The Class representative and members of the Class were all assaulted by Wilkey in Hamilton County.

57. Most, if not all, were citizens and residents of Hamilton County.

58. At all times material, Wilkey was an employee of the Hamilton County Sheriff's Office and was acting in his capacity as such and under color of law.

59. For approximately two years, Wilkey undertook a course of conduct that included physically and/or sexually assaulting detainees in his custody.

60. Wilkey's actions resulted in the violation of the constitutional rights of the Class representative and members of the Class including those guaranteed by U.S. Const. amend 4, 8 and 14.

61. Wilkey was responsible for the safety and care of the Class Representative and the members of the Class while they were in his custody and control.

62. Hamilton County was responsible for the safety and care of the Class representative and the members of the Class while they were in Wilkey's custody and control.

63. At all times material, Wilkey and Hamilton County were performing a state and county governmental function.

64. Hamilton County is responsible for its own actions and omissions and the actions of its employees, including Wilkey.

65. Hamilton County bears responsibility for the wrongful actions of Wilkey because it was deliberately indifferent to the violation of the constitutional rights of the Class representative and Class.

66. Hamilton County provided deficient training and supervision to Wilkey and the Sheriff of Hamilton County has stated, as to one wrongful assault, that Wilkey's actions were in compliance with Wilkey's training and supervision.

67. Jurisdiction to entertain the federal claim is provided by 28 U.S.C. §§ 1331, 1334 (a)(3)(4), and 42 U.S.C. §§ 1983 & 1988.

68. Jurisdiction to entertain the state claims is provided by 28 U.S.C. § 1367.

69. Venue is provided by 28 U.S.C. § 1367.

III. Federal Constitutional Claims

70. This is an action against Wilkey in his official capacity as a Hamilton County deputy sheriff.

71. At all times material, Wilkey was acting under color of law.

72. Wilkey's unlawful actions were, at all times, undertaken in accordance with a Hamilton County custom and/or practice of deliberate indifference to the violation of the constitutional rights of the Representative Plaintiff and the Class.

73. The constitutional rights of the Class Representative and the Class that were violated by Wilkey and Hamilton County include those secured by U.S. Const. amend. 4, 8 and 14.

74. At all times material Wilkey's acts were in accordance with Hamilton County's pattern or practice of deliberate indifference to the rights of the Class Representative and members of the Class and the pattern or practice of deliberate indifference to the rights of the Class Representative and the members of the Class was the proximate cause and cause in fact of their injuries.

75. Wilkey's actions in publicly and wrongfully assaulting the Class Representative and the members of the Class were patent and obvious.

76. At least one arrest and wrongful assault by Wilkey was reviewed by the Hamilton County Sheriff who then announced that Wilkey's actions were in accord with his education and training as a Hamilton County detective; the education and training of Wilkey was therefore constitutionally deficient and the deficiency caused the injuries of the Class Representative and the Class.

77. Hamilton County failed to properly supervise Wilkey and this failure proximately caused and caused in fact the injuries suffered by the Class Representative and the Class. On many occasions, including the wrongful assault of the Class Representative, Wilkey was accompanied by one of two Hamilton County sheriff's deputies. In the case of the Class Representative, the two other officers did not interrupt Wilkey's wrongful assault nor did either of them report Wilkey to his superiors indicating that Wilkey's wrongful and unconstitutional acts were in compliance with the training and supervision provided by Hamilton County and shows a pattern or practice of deliberate indifference to the rights of the Class Representative and each member of the Class.

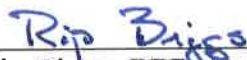
WHEREFORE, Jarnagin prays that:

1. Process issue and be served on Wilkey and Hamilton County requiring them to answer in accordance with law.
2. The Court certify the Class.
3. The Court empanel a jury to hear this action.
4. Jarnagin and each member of the Class be awarded a judgment for all of their injuries and damages against Wilkey and Hamilton County, jointly and severally.
5. Jarnagin and the members of the Class have such other and further relief to which they are entitled.

Respectfully Submitted,

CAVETT, ABBOTT & WEISS, PLLC

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No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

EXTORTION COUNT 1 OF 44
TENNESSEE CODE ANNOTATED 39-14-112 (CLASS D FELONY)

FALSE IMPRISONMENT COUNT 2 OF 44
TENNESSEE CODE ANNOTATED 39-13-302 (CLASS A MISDEMEANOR)

STATE OF TENNESSEE

VS.

DANIEL WILKEY 598941

[Handwritten signatures]
25,000 - BOND

[Handwritten signatures]
Myra Adams

District Attorney General

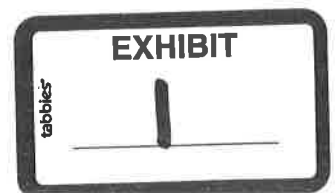
[Handwritten signature]
Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed



309325

STATE OF TENNESSEE, HAMILTON COUNTY

Criminal Court

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on or before February 7, 2019, in the County aforesaid, did unlawfully use coercion upon another, to-wit: Shandel Riley, with the intent to obtain property, services, any advantage or immunity or to restrict unlawfully another's freedom of action, in violation of Tennessee Code Annotated 39-14-112, against the peace and dignity of the State.

Count 2:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on or before February 7, 2019, in the County aforesaid, did unlawfully and knowingly remove or confine Shandel Riley, so as to interfere substantially with that person's liberty, in violation of Tennessee Code Annotated 39-13-302, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

OFFICIAL OPPRESSION COUNT 3 OF 44
TENNESSEE CODE ANNOTATED 39-16-403 (CLASS E FELONY)

ASSAULT COUNT 4 OF 44
TENNESSEE CODE ANNOTATED 39-13-101 (CLASS A MISDEMEANOR)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 3:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, who was a public servant as defined in Tennessee Code Annotated 39-16-401 at the time of the offense, heretofore on or before February 7, 2019, in the County aforesaid, did unlawfully and intentionally, while acting under color of office or employment, subject another person, to-wit: Shandel Riley to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful, in violation of Tennessee Code Annotated 39-16-403, against the peace and dignity of the State.

Count 4:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on or before February 7, 2019 in the County aforesaid, did unlawfully, intentionally, knowingly or recklessly cause bodily injury to Shandel Riley, or did intentionally or knowingly cause Shandel Riley to reasonably fear imminent bodily injury, in violation of Tennessee Code Annotated 39-13-101, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

STALKING COUNT 5 OF 44
TENNESSEE CODE ANNOTATED 39-17-315 (CLASS A MISDEMEANOR)


STALKING COUNT 6 OF 44
TENNESSEE CODE ANNOTATED 39-17-315 (CLASS A MISDEMEANOR)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 5:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore between February 1, 2019 and June 30, 2019, in the County aforesaid, did unlawfully engage in a willful course of conduct involving repeated or continuing harassment of another individual, to-wit: Shandel Riley that would cause a reasonable person to feel terrorized, frightened, intimidated, threatened, harassed, or molested, and that actually caused Shandel Riley to feel terrorized, frightened, intimidated, threatened, harassed, or molested, in violation of Tennessee Code Annotated 39-17-315, against the peace and dignity of the State.

Count 6:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore between April 1, 2018 and April 30, 2019, in the County aforesaid, did unlawfully engage in a willful course of conduct involving repeated or continuing harassment of another individual, to-wit: Kelsey Wilson that would cause a reasonable person to feel terrorized, frightened, intimidated, threatened, harassed, or molested, and that actually caused Kelsey Wilson to feel terrorized, frightened, intimidated, threatened, harassed, or molested, in violation of Tennessee Code Annotated 39-17-315, against the peace and dignity of the State.

No.

GJ No. P-19-
P-19-

309325

A TRUE BILL

STALKING COUNT 7 OF 44
TENNESSEE CODE ANNOTATED 39-17-315 (CLASS A MISDEMEANOR)

STALKING COUNT 8 OF 44
TENNESSEE CODE ANNOTATED 39-17-315 (CLASS A MISDEMEANOR)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

✓ TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309125

Count 7:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore between April 1, 2018 and April 30, 2019, in the County aforesaid, did unlawfully engage in a willful course of conduct involving repeated or continuing harassment of another individual, to-wit: Kelsey Wilson that would cause a reasonable person to feel terrorized, frightened, intimidated, threatened, harassed, or molested, and that actually caused Kelsey Wilson to feel terrorized, frightened, intimidated, threatened, harassed, or molested, in violation of Tennessee Code Annotated 39-17-315, against the peace and dignity of the State.

Count 8:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore between April 1, 2018 and April 30, 2019, in the County aforesaid, did unlawfully engage in a willful course of conduct involving repeated or continuing harassment of another individual, to-wit: Kelsey Wilson that would cause a reasonable person to feel terrorized, frightened, intimidated, threatened, harassed, or molested, and that actually caused Kelsey Wilson to feel terrorized, frightened, intimidated, threatened, harassed, or molested, in violation of Tennessee Code Annotated 39-17-315, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

SEXUAL BATTERY COUNT 9 OF 44
TENNESSEE CODE ANNOTATED 39-13-505 (CLASS E FELONY)

SEXUAL BATTERY COUNT 10 OF 44
TENNESSEE CODE ANNOTATED 39-13-505 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman of
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

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Count 9:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally engage in sexual contact with Kelsey Wilson, and the sexual contact was accomplished without the consent of the victim and the defendant knew or had reason to know at the time of the contact that the victim did not consent, in violation of Tennessee Code Annotated 39-13-505, against the peace and dignity of the State.

Count 10:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally engage in sexual contact with Kelsey Wilson, and the sexual contact was accomplished without the consent of the victim and the defendant knew or had reason to know at the time of the contact that the victim did not consent, in violation of Tennessee Code Annotated 39-13-505, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

SEXUAL BATTERY COUNT 11 OF 44
TENNESSEE CODE ANNOTATED 39-13-505 (CLASS E FELONY)

SEXUAL BATTERY COUNT 12 OF 44
TENNESSEE CODE ANNOTATED 39-13-505 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 11:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally engage in sexual contact with Kelsey Wilson, and the sexual contact was accomplished without the consent of the victim and the defendant knew or had reason to know at the time of the contact that the victim did not consent, in violation of Tennessee Code Annotated 39-13-505, against the peace and dignity of the State.

Count 12:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally engage in sexual contact with Kelsey Wilson, and the sexual contact was accomplished without the consent of the victim and the defendant knew or had reason to know at the time of the contact that the victim did not consent, in violation of Tennessee Code Annotated 39-13-505, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

SEXUAL BATTERY COUNT 13 OF 44
TENNESSEE CODE ANNOTATED 39-13-505 (CLASS E FELONY)

SEXUAL BATTERY COUNT 14 OF 44
TENNESSEE CODE ANNOTATED 39-13-505 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 13:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally engage in sexual contact with Kelsey Wilson, and the sexual contact was accomplished without the consent of the victim and the defendant knew or had reason to know at the time of the contact that the victim did not consent, in violation of Tennessee Code Annotated 39-13-505, against the peace and dignity of the State.

Count 14:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally engage in sexual contact with Kelsey Wilson, and the sexual contact was accomplished without the consent of the victim and the defendant knew or had reason to know at the time of the contact that the victim did not consent, in violation of Tennessee Code Annotated 39-13-505, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

OFFICIAL OPPRESSION COUNT 15 OF 44
TENNESSEE CODE ANNOTATED 39-16-403 (CLASS E FELONY)

OFFICIAL OPPRESSION COUNT 16 OF 44
TENNESSEE CODE ANNOTATED 39-16-403 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 15:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, who was a public servant as defined in Tennessee Code Annotated 39-16-401 at the time of the offense, heretofore between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally, while acting under color of office or employment, subject another person, to-wit: Kelsey Wilson to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful, in violation of Tennessee Code Annotated 39-16-403, against the peace and dignity of the State.

Count 16:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, who was a public servant as defined in Tennessee Code Annotated 39-16-401 at the time of the offense, heretofore between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally, while acting under color of office or employment, subject another person, to-wit: Kelsey Wilson to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful, in violation of Tennessee Code Annotated 39-16-403, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

OFFICIAL OPPRESSION COUNT 17 OF 44
TENNESSEE CODE ANNOTATED 39-16-403 (CLASS E FELONY)

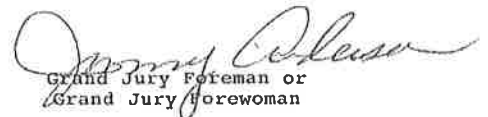
OFFICIAL OPPRESSION COUNT 18 OF 44
TENNESSEE CODE ANNOTATED 39-16-403 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 17:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, who was a public servant as defined in Tennessee Code Annotated 39-16-401 at the time of the offense, heretofore between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally, while acting under color of office or employment, subject another person, to-wit: Kelsey Wilson to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful, in violation of Tennessee Code Annotated 39-16-403, against the peace and dignity of the State.

Count 18:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, who was a public servant as defined in Tennessee Code Annotated 39-16-401 at the time of the offense, heretofore between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally, while acting under color of office or employment, subject another person, to-wit: Kelsey Wilson to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful, in violation of Tennessee Code Annotated 39-16-403, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

OFFICIAL OPPRESSION COUNT 19 OF 44
TENNESSEE CODE ANNOTATED 39-16-403 (CLASS E FELONY)


OFFICIAL OPPRESSION COUNT 20 OF 44
TENNESSEE CODE ANNOTATED 39-16-403 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 19:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, who was a public servant as defined in Tennessee Code Annotated 39-16-401 at the time of the offense, heretofore between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally, while acting under color of office or employment, subject another person, to-wit: Kelsey Wilson to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful, in violation of Tennessee Code Annotated 39-16-403, against the peace and dignity of the State.

Count 20:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, who was a public servant as defined in Tennessee Code Annotated 39-16-401 at the time of the offense, heretofore between June 1, 2018 and March 30, 2019, in the County aforesaid, did unlawfully and intentionally, while acting under color of office or employment, subject another person, to-wit: Kelsey Wilson to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful, in violation of Tennessee Code Annotated 39-16-403, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

FALSE IMPRISONMENT COUNT 21 OF 44
TENNESSEE CODE ANNOTATED 39-13-302 (CLASS A MISDEMEANOR)

ASSAULT COUNT 22 OF 44
TENNESSEE CODE ANNOTATED 39-13-101 (CLASS A MISDEMEANOR)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

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Count 21:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on March 30, 2019, in the County aforesaid, did unlawfully and knowingly remove or confine Maxwell Jarnigan, so as to interfere substantially with that person's liberty, in violation of Tennessee Code Annotated 39-13-302, against the peace and dignity of the State.

Count 22:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on March 30, 2019, in the County aforesaid, did unlawfully, intentionally, knowingly or recklessly cause bodily injury to Maxwell Jarnigan, or did intentionally or knowingly cause Maxwell Jarnigan to reasonably fear imminent bodily injury, in violation of Tennessee Code Annotated 39-13-101, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

OFFICIAL OPPRESSION COUNT 23 OF 44
TENNESSEE CODE ANNOTATED 39-16-403 (CLASS E FELONY)


RAPE COUNT 24 OF 44
TENNESSEE CODE ANNOTATED 39-13-503 (CLASS B FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 23:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, who was a public servant as defined in Tennessee Code Annotated 39-16-401 at the time of the offense, heretofore on March 30, 2019, in the County aforesaid, did unlawfully and intentionally, while acting under color of office or employment, subject another person, to-wit: Maxwell Jarnigan to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful, in violation of Tennessee Code Annotated 39-16-403, against the peace and dignity of the State.

Count 24:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on July 10, 2019, in the County aforesaid, did unlawfully and intentionally or knowingly engage in sexual penetration, with James Mitchell, and the sexual penetration was accomplished without the consent of the victim and the defendant knew or had reason to know at the time of the penetration that the victim did not consent, in violation of Tennessee Code Annotated 39-13-503(a)(2), against the peace and dignity of the State.

No.

GJ No. P-19-
P-19-

309325

A TRUE BILL

RAPE COUNT 25 OF 44

TENNESSEE CODE ANNOTATED 39-13-503 (CLASS B FELONY)

ASSAULT COUNT 26 OF 44

TENNESSEE CODE ANNOTATED 39-13-101 (CLASS A MISDEMEANOR)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:
TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 25:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on July 10, 2019, in the County aforesaid, did unlawfully and intentionally or knowingly engage in sexual penetration, with James Mitchell, and the sexual penetration was accomplished without the consent of the victim and the defendant knew or had reason to know at the time of the penetration that the victim did not consent, in violation of Tennessee Code Annotated 39-13-503(a)(2), against the peace and dignity of the State.

Count 26:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on July 10, 2019, in the County aforesaid, did unlawfully, intentionally, knowingly or recklessly cause bodily injury to James Mitchell, or did intentionally or knowingly cause James Mitchell to reasonably fear imminent bodily injury, in violation of Tennessee Code Annotated 39-13-101, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

OFFICIAL OPPRESSION COUNT 27 OF 44
TENNESSEE CODE ANNOTATED 39-16-403 (CLASS E FELONY)

RECKLESS ENDANGERMENT COUNT 28 OF 44
TENNESSEE CODE ANNOTATED 39-13-103 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 27:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, who was a public servant as defined in Tennessee Code Annotated 39-16-401 at the time of the offense, heretofore on July 10, 2019, in the County aforesaid, did unlawfully and intentionally, while acting under color of office or employment, subject another person, to-wit: James Mitchell to mistreatment or to arrest, detention, stop, frisk, halt, search, seizure, dispossession, assessment or lien when the public servant knows the conduct is unlawful, in violation of Tennessee Code Annotated 39-16-403, against the peace and dignity of the State.

Count 28:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on January 4, 2019, in the County aforesaid, did unlawfully and recklessly engage in conduct which placed various individuals in Hamilton County, Tennessee in imminent danger of death or serious bodily injury, by use of a deadly weapon, in violation of Tennessee Code Annotated 39-13-103, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

RECKLESS DRIVING COUNT 29 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)

RECKLESS ENDANGERMENT COUNT 30 OF 44
TENNESSEE CODE ANNOTATED 39-13-103 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 29:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on January 4, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.

Count 30:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on May 16, 2019, in the County aforesaid, did unlawfully and recklessly engage in conduct which placed various individuals in Hamilton County, Tennessee in imminent danger of death or serious bodily injury, by use of a deadly weapon, in violation of Tennessee Code Annotated 39-13-103, against the peace and dignity of the State.

No. 309325

GJ No. P-19-
P-19-

A TRUE BILL

RECKLESS DRIVING COUNT 31 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)

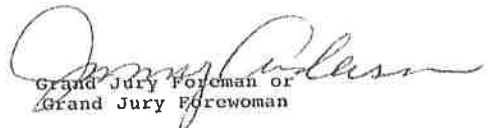
RECKLESS ENDANGERMENT COUNT 32 OF 44
TENNESSEE CODE ANNOTATED 39-13-103 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:
TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 31:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on May 16, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.

Count 32:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on June 8, 2019, in the County aforesaid, did unlawfully and recklessly engage in conduct which placed various individuals in Hamilton County, Tennessee in imminent danger of death or serious bodily injury, by use of a deadly weapon, in violation of Tennessee Code Annotated 39-13-103, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

RECKLESS DRIVING COUNT 33 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)

RECKLESS ENDANGERMENT COUNT 34 OF 44
TENNESSEE CODE ANNOTATED 39-13-103 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 33:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on June 8, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.

Count 34:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on June 12, 2019, in the County aforesaid, did unlawfully and recklessly engage in conduct which placed various individuals in Hamilton County, Tennessee in imminent danger of death or serious bodily injury, by use of a deadly weapon, in violation of Tennessee Code Annotated 39-13-103, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

RECKLESS DRIVING COUNT 35 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)

RECKLESS ENDANGERMENT COUNT 36 OF 44
TENNESSEE CODE ANNOTATED 39-13-103 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 35:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on June 12, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.

Count 36:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on June 22, 2019, in the County aforesaid, did unlawfully and recklessly engage in conduct which placed various individuals in Hamilton County, Tennessee in imminent danger of death or serious bodily injury, by use of a deadly weapon, in violation of Tennessee Code Annotated 39-13-103, against the peace and dignity of the State.

No.

GJ No. P-19-
P-19-

309325

A TRUE BILL

RECKLESS DRIVING COUNT 37 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)

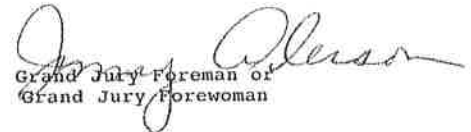
RECKLESS ENDANGERMENT COUNT 38 OF 44
TENNESSEE CODE ANNOTATED 39-13-103 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:
TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 37:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on June 22, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.

Count 38:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on June 23, 2019, in the County aforesaid, did unlawfully and recklessly engage in conduct which placed various individuals in Hamilton County, Tennessee in imminent danger of death or serious bodily injury, by use of a deadly weapon, in violation of Tennessee Code Annotated 39-13-103, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

RECKLESS DRIVING COUNT 39 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)


RECKLESS ENDANGERMENT COUNT 40 OF 44
TENNESSEE CODE ANNOTATED 39-13-103 (CLASS E FELONY)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

00325

Count 39:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on June 23, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.

Count 40:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey, heretofore on June 23, 2019, in the County aforesaid, did unlawfully and recklessly engage in conduct which placed various individuals in Hamilton County, Tennessee in imminent danger of death or serious bodily injury, by use of a deadly weapon, in violation of Tennessee Code Annotated 39-13-103, against the peace and dignity of the State.

No.

309325

GJ No. P-19-
P-19-

A TRUE BILL

RECKLESS DRIVING COUNT 41 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)

RECKLESS DRIVING COUNT 42 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 41:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on June 23, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.

Count 42:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on June 21, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.

No. 309325

GJ No. P-19-
P-19-

A TRUE BILL

RECKLESS DRIVING COUNT 43 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)


RECKLESS DRIVING COUNT 44 OF 44
TENNESSEE CODE ANNOTATED 55-10-205 (CLASS B MISDEMEANOR)

STATE OF TENNESSEE

VS.

DANIEL WILKEY

District Attorney General


Grand Jury Foreman or
Grand Jury Forewoman

Clerk's Summons for the State

Prosecutor:

TOMMY MEEKS, HAMILTON COUNTY DISTRICT ATTORNEY'S OFFICE

Filed

309325

Count 43:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on July 3, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.

Count 44:

THE GRAND JURORS for the State aforesaid, being duly summoned, elected, impaneled sworn and charged to inquire for the body of the County aforesaid, upon their oaths present:

That Daniel Wilkey heretofore on July 6, 2019, in the County aforesaid, did unlawfully and knowingly drive a motor vehicle upon and over public streets and highways of Hamilton County, Tennessee, carelessly, heedlessly and recklessly, in a manner so as to endanger the life, limb and property of other persons, and in wanton and willful disregard of the rights and safety of other persons, in violation of Tennessee Code Annotated 55-10-205, against the peace and dignity of the State.


DISTRICT ATTORNEY GENERAL