

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
JONESBORO DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

JUN 17 2026

TAMMY H. DOWNS, CLERK
By: Paul Rose
DEP CLERK

DEVIN ZAYNE GRIFFIN,
Plaintiff,

v. Civil Action No. _____

3:26-cv-00172-BSM

CONNOR RICHARDSON, individually and in his official capacity as Deputy, Craighead County Sheriff's Dept;
LEVI CHISM, individually and in his official capacity as Deputy, Craighead County Sheriff's Dept;
MOISSES ARELLANO, individually and in his official capacity as Deputy, Craighead County Sheriff's Dept;
DAVID McCARTHY, individually and in his official capacity as Deputy, Craighead County Sheriff's Dept;
JORDAN DRUM, individually and in his official capacity as Deputy, Craighead County Sheriff's Dept;
JASON ALLEN, individually and in his official capacity as Assistant Chief Deputy;
STARLEIGH RICHARDSON, individually and in her official capacity as FOIA Custodian;
RON RICHARDSON, individually and in his official capacity as Captain of Investigations, Craighead County Sheriff's Dept (Retired);
CRAIGHEAD COUNTY, ARKANSAS, a municipal corporation;

Defendants.

COMPLAINT FOR CIVIL RIGHTS VIOLATIONS

(42 U.S.C. § 1983; Jury Trial Demanded)

INTRODUCTION

1. This is a civil rights action brought under 42 U.S.C. § 1983 to redress deprivations, under color of state law, of Plaintiff Devin Zayne Griffin's rights secured by the First, Fourth, and Fourteenth Amendments to the United States Constitution.

This case assigned to District Judge Miller
and to Magistrate Judge VDIRe

2. On June 17, 2023, Plaintiff was detained in his home, arrested, and prosecuted by deputies of the Craighead County Sheriff's Office. During the incident, Defendant Deputy Connor Richardson called his supervisor, who denied authorization to arrest Plaintiff for assault third. Within seconds of ending that call, Richardson turned to another deputy and stated, "I want to arrest this mother fucker so bad." Plaintiff was thereafter kept detained in his kitchen and ultimately arrested without a warrant or probable cause, despite the supervisor's explicit denial, the absence of any observed crime, and the complaining witness's exculpatory statements.
3. Plaintiff further alleges that, following the arrest, the involved deputies and supervisory officials suppressed or failed to preserve exculpatory evidence, provided incomplete and misleading information in official reports and charging documents, and obstructed Plaintiff's post-dismissal efforts to obtain public records. The full scope of those acts, including the structural mechanism by which body-worn camera footage from three responding deputies was allowed to be automatically deleted while criminal cases remained pending, is set forth in the factual allegations below.

JURISDICTION AND VENUE

4. This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3)-(4) because Plaintiff's claims arise under the Constitution and laws of the United States, including 42 U.S.C. § 1983.
5. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) because a substantial part of the events and omissions giving rise to Plaintiff's claims occurred in Craighead County, Arkansas, which lies within the Eastern District of Arkansas, Jonesboro Division.

PARTIES

6. Plaintiff Devin Zayne Griffin is, and was at all relevant times, a resident of Craighead County, Arkansas. He brings this action pro se.
7. Defendants Connor Richardson, Levi Chism, Moisses Arellano, David McCarthy, and Jordan Drum were, at all relevant times, employed as deputies by the Craighead County Sheriff's Office. They are sued in their individual and official capacities.
8. Defendant Jason Allen was, at all times relevant to the post-incident conduct alleged in this Complaint, the Assistant Chief Deputy of the Craighead County Sheriff's Office. With respect to the policies, practices, and decisions described herein, he acted as a final policymaker for Craighead County. He is sued in his individual and official capacities.
9. Defendant Starleigh Richardson was, at all relevant times, the Freedom of Information Act (FOIA) records custodian for the Craighead County Sheriff's Office. She handled Plaintiff's FOIA requests regarding the June 16-17, 2023 incidents and is sued in her individual and official capacities.
10. Defendant Ron Richardson was, at all relevant times, the Captain of Investigations for the Craighead County Sheriff's Office. In that capacity, he was responsible for investigatory assignment decisions, case status designations, and related record-retention matters for CCSO investigations. Richardson retired from CCSO in approximately October 2025. On information and belief, Defendant Ron Richardson is the father of Defendant Deputy Connor Richardson and the brother-in-law of Defendant Starleigh Richardson. The basis for naming him as a defendant, and his role in the events alleged herein, is set forth in the factual allegations below. He is sued in his individual and former official capacities.
11. Defendant Craighead County, Arkansas is a municipal corporation organized under the laws of the State of Arkansas. It operates and is responsible for the policies, practices, and customs of the Craighead County Sheriff's Office and is liable under *Monell v.*

Department of Social Services, 436 U.S. 658 (1978), for the unconstitutional policies, customs, and ratification of its final policymakers as alleged herein.

12. At all relevant times, the individual Defendants acted within the scope of their employment with the Craighead County Sheriff's Office and under color of state law.

FACTUAL ALLEGATIONS

I. The Detention and Arrest (June 17, 2023)

13. On June 17, 2023, deputies from the Craighead County Sheriff's Office, including Defendants Connor Richardson, Moisses Arellano, Jordan Drum, and David McCarthy, responded to Plaintiff's residence following a call from Plaintiff's wife, Brittany Pennington.
14. Upon arrival, Defendants Richardson, Drum, and Arellano briefly encountered Pennington outside the residence. During this initial contact, and at all times throughout the encounter, Pennington explicitly and repeatedly stated that Plaintiff never put his hands on her. No deputy observed any injury to Pennington or any evidence of a physical assault by Plaintiff.
15. Upon information and belief, at approximately 01:36 on his body-worn camera ("BWC"), Defendant Richardson stated to the other deputies that he had completed a report on Plaintiff arising from the prior day's hotel contact and that Plaintiff had been or would be charged with assault third. Plaintiff had not been charged with assault third the day before. Defendant Drum had responded with Richardson to Pennington's hotel on June 16 and possessed actual knowledge of what had and had not been formally charged. At approximately the same time, Defendant Arellano is heard on BWC referencing a check of some kind, stating "I checked [inaudible] and... ehhe," suggesting that whatever he reviewed did not yield definitive results. Despite Drum's

- knowledge that no prior charge had been filed, Drum did not correct Richardson's statement.
16. After this exchange on the lawn, Defendants Richardson, Drum, and Arellano entered Plaintiff's residence and began questioning him. At approximately 05:10 on the BWC, Plaintiff explicitly asked if he was free to end the encounter and leave the room, stating, "I can actually leave then, right?" The deputies told him, "No, because we're doing an interview." When Plaintiff then asked to step outside, the deputies again refused and required him to remain in the center of his kitchen.
 17. After being told he could not leave and could not move freely within his own home, Plaintiff remained in his kitchen under the supervision of the deputies. Defendants Drum and Arellano participated in keeping Plaintiff in the kitchen. Defendant Drum did so despite his personal knowledge of what had and had not been formally charged. At no point from this moment forward was Plaintiff free to end the encounter or leave the room.
 18. Shortly after Plaintiff was confined to the kitchen, Defendant Richardson left Defendants Drum and Arellano inside to maintain the detention while he stepped outside alone to contact his supervisor to request authorization to arrest Plaintiff.
 19. Immediately before calling his supervisor, Defendant Richardson again spoke with Pennington outside. During this conversation, Pennington made statements that contradicted any claim that Plaintiff had assaulted her. At approximately 06:06 on Richardson's BWC, Richardson asked Pennington if she had been drinking, and she responded, "Yes, sir. I had a couple of shots." She then volunteered, at approximately 06:08-06:11, "And I will tell you, I did... I did have my hands on him." When Richardson responded "Okay," Pennington explained, "But it was because he started taking my stuff." Pennington's own account thus identified herself as the person who initiated physical contact. Neither Plaintiff nor Pennington had any visible injuries

suggesting an assault had occurred.

20. Upon receiving this exculpatory information, Defendant Richardson contacted Supervisor Taylor Iglehart by phone to request permission to arrest Plaintiff. In that call, Richardson's characterization of events to Iglehart did not include Pennington's admissions regarding drinking and physical contact with Plaintiff. At approximately 07:51 on the BWC, Richardson told Iglehart that Pennington "felt like he was going to put hands on her." When characterizing Plaintiff's demeanor during the call, Richardson told Iglehart, "No, he's not saying shit except that loves her more than anything." This framing omitted the facts that Pennington had just admitted on camera to drinking and to placing her own hands on Plaintiff.
21. After hearing Richardson's account, Supervisor Iglehart declined to authorize the arrest. Richardson's BWC captures his response at approximately 08:22 reflecting the denial: Richardson states into the phone, "Okay, so, I can't get him for assault third today... Yeah... Yep... Okay." Moments after receiving that denial, at approximately 09:07 on his BWC, Richardson turned to Defendant McCarthy and stated, "I want to arrest this mother fucker so bad."
22. Shortly after the supervisor's denial, at approximately 09:12 on his BWC, Defendant Richardson told Pennington that Plaintiff was "not going to go to jail today... because you don't have any marks or anything," referring to the absence of visible injuries on Pennington. At approximately 09:53, Richardson advised her to "go file an affidavit" the next morning instead.
23. Shortly thereafter, Defendant Chism arrived on scene, approximately twelve minutes after the initial deputies. On information and belief, a domestic-violence advocate arrived at the scene contemporaneously with Chism. CAD Log C2120633, obtained from Jonesboro Central Dispatch, reflects that Defendant Chism (Unit CR26) was dispatched at approximately 15:50:38 and arrived at approximately 16:15:26, after

other deputies were already on scene. The same CAD log records Defendant Arellano (CR30) arriving at 16:03:19, Defendant Richardson (CR8) at 16:04:58, and Defendant Drum (CR41) at 16:05:04.

24. Between approximately 11:41 and 12:06 on Richardson's BWC, Defendant Richardson briefed Defendant Chism on the situation, including his call to Supervisor Iglehart and the denial of authorization to arrest for assault third. During this briefing, at approximately 11:55 on Richardson's BWC, Richardson told Chism: "I called [Iglehart]. I didn't know where you were." This statement reflects that Richardson was aware Chism had been dispatched and was expected on scene, and that the supervisor call was made in the interim period while awaiting Chism's arrival. Defendant Chism acknowledged the supervisor's denial but stated on video at approximately 12:06: "Yeah, but he doesn't know the witnesses." This statement permits the inference that Chism knew the supervisor had declined to authorize an arrest but intended to proceed regardless. While Richardson disclosed the supervisor's denial to Chism during this briefing, he did not disclose that Pennington had admitted on his own BWC to having been drinking and to placing her own hands on Plaintiff. Defendant Chism did not activate his own body-worn camera during this briefing. His camera was activated only as he concluded the briefing and approached the residence to enter. As a result, the briefing is captured on Richardson's BWC, not Chism's, and what Chism was told outside -- and what he was not told -- is established through Richardson's recording.
25. While Defendants Richardson and Chism were outside during this briefing, Defendants Arellano and Drum remained inside with Plaintiff. During this period, Defendant Arellano escalated the encounter by threatening Plaintiff with an "obstruction" charge and thereafter placed Plaintiff in handcuffs, effectuating a de facto arrest without a warrant. The obstruction threat and the handcuffing itself are not captured on any body-worn camera footage in Plaintiff's possession. BWC footage from Defendants

Arellano and Drum that would have recorded these events has not been produced and, on information and belief, was destroyed or otherwise not preserved.

26. Shortly after Plaintiff was placed in handcuffs, Defendant Chism concluded the briefing, activated his body-worn camera, and entered the residence. At the outset of Chism's recording -- at approximately 00:10-00:12 -- Plaintiff was already in handcuffs and actively protesting the detention. Plaintiff can be heard challenging the legal basis for being held, stating in substance that he could not be detained for obstruction when no lawful arrest had been made in the first place -- that a secondary charge cannot attach where the predicate detention itself was unlawful. Defendant Arellano can be heard responding: "I don't need a reason to detain you." Plaintiff also stated, "There goes your qualified immunity."
27. Inside, Plaintiff continued to protest the handcuffing by Defendant Arellano. Plaintiff asked Defendant Chism if he was a supervisor. Chism wore no visible insignia indicating supervisory rank. When Chism replied, "I am today," Plaintiff repeatedly asked for a true sergeant or lieutenant, and then invoked his right to counsel, stating: "I want an attorney."
28. At approximately 00:26 on Chism's BWC, Plaintiff invoked his right to an attorney. Approximately three seconds later, at 00:29, Defendant Chism stated, "Okay, well, you're under arrest for assault third," and placed Plaintiff under arrest. The close timing between Plaintiff's request for counsel and the arrest permits a reasonable inference that the arrest was retaliatory.
29. At the time Plaintiff was initially handcuffed inside the residence, Defendants Richardson and Chism were outside the home. That detention was effectuated inside by Defendant Arellano, while Defendant Drum was present. CAD Log C2120633 reflects 'ONE DETAINED' at approximately 16:16:23 -- less than one minute after Defendant Chism's arrival on scene. Chism's BWC confirms that his entire interaction with

Plaintiff, from entry through the arrest announcement, lasted only seconds.

30. Deputies thereafter transported Plaintiff to the Craighead County Detention Center, where he was booked and held for approximately two days. At no point during the June 17, 2023 encounter did any deputy on scene state that Plaintiff was suspected of 'false imprisonment.' Plaintiff was only told he was under arrest for 'assault third,' and he first learned he had also been charged with False Imprisonment in the Second Degree when he appeared before the district-court judge from the jail. When deputies arrived on June 17, 2023, Pennington was already outside the residence and Plaintiff was inside; no deputy personally observed any physical altercation, argument, or threat between them before or during the encounter. At the time of Plaintiff's arrest, no deputy had observed Plaintiff restrain or threaten Pennington, and no facts about any alleged restraint of Pennington were documented or articulated on scene.
31. Plaintiff suffered severe and ongoing economic and employment harm as a direct result of the arrest and prosecution. Prior to June 17, 2023, Plaintiff had approximately nine years of experience with Darden Restaurants, including more than seven years as a manager, and one year with Verizon as a customer service representative. On December 16, 2023 -- four days after the nolle prosequi -- DoorDash issued a post-adverse-action notice denying Plaintiff access to its platform, citing both criminal charges as the basis for the denial, with both charges listed as 'PENDING.' In addition, Plaintiff was forced to liquidate his 401(k) retirement savings to meet basic living expenses.
32. Following the arrest, Plaintiff developed severe psychological harm and anxiety that has prevented him from entering public spaces, driving, or maintaining employment. For several months following the arrest, Plaintiff was unable to sleep without the lights on.
33. Plaintiff's relationships with his family were also severely impacted. He stopped attending family gatherings, ceased visiting his grandparents who live next door, and

became largely unable to leave his home. Plaintiff's relationships with his immediate family were strained to the point that he and his father did not speak for approximately four months. Plaintiff's father, mother, and grandparents can attest to the changes in Plaintiff's functioning and emotional condition following the June 17, 2023 arrest.

II. Fabrication, Omission of Evidence, and Structural Concealment

34. Defendant Chism authored Craighead County Sheriff's Office Incident Report No. 23-01223. Defendant Chism omitted multiple material facts from the report, including: (a) Pennington's exculpatory admissions, captured on Defendant Richardson's BWC, that she had been drinking and that she 'did have [her] hands on him'; (b) the fact that Supervisor Taylor Iglehart denied authorization to arrest Plaintiff for assault third; (c) the fact that Plaintiff had already been handcuffed by Defendant Arellano before Chism entered the residence; (d) the specific roles and identities of Defendants Arellano, Drum, McCarthy, and Richardson, whom Chism omitted in his narrative by listing only himself as the responding officer on Page 1; and (e) the presence of the domestic-violence advocate who interacted with the complainant during the investigation.
35. Defendant Chism stated in his report that he interviewed Plaintiff and based the arrest decision on that conversation. BWC evidence shows that at approximately 00:26 on his BWC, Plaintiff requested an attorney, and at approximately 00:29 Chism responded, 'Okay, well, you're under arrest for assault third.' Chism did not substantively interview Plaintiff until several minutes after Plaintiff was already handcuffed. At approximately 05:26 on Chism's BWC, he stated, 'I don't know anything about marks on you,' confirming that he had conducted no investigation into potential injuries before executing the arrest. The narrative in Incident Report No. 23-01223 thus describes a sequence of events -- interview, assessment, arrest decision -- that Chism's own

body-worn camera demonstrates did not occur in that order or in that manner.

36. Following the arrest, Defendant Chism's BWC recording contains an audio gap from approximately 09:58 to 13:02 -- a period of approximately three minutes -- during which the microphone was muted. This gap encompasses the period immediately following Plaintiff's arrest and removal from the scene. Chism's camera resumed recording at approximately 13:02, at which point Chism began an on-camera interview with Pennington.
37. On June 19, 2023, criminal docket numbers JOS-23-1022 and JOS-23-1023 were filed against Plaintiff in Craighead County District Court for assault in the third degree and false imprisonment in the second degree, respectively. The criminal charges were ultimately nolle prosequi on December 12, 2023.
38. Incident Report No. 23-01223 contains a designated 'Assisting Officers' field on Page 1 that is left entirely blank in both the June 19, 2023 version printed from Plaintiff's criminal case file and the December 19, 2025 version produced in response to Plaintiff's FOIA request. Defendant Chism's own narrative on Page 2 acknowledges the presence of other deputies, stating: 'Upon my arrival, other deputies had already arrived on scene and had Arrestee #1 (Griffin, Devin) detained.' CAD Log C2120633, obtained from Jonesboro Central Dispatch -- an independent entity separate from CCSO -- records five CCSO units dispatched to and present at the scene: CR26 (Chism), CR30 (Arellano), CR36 (McCarthy), CR8 (Richardson), and CR41 (Drum). Arellano arrived at approximately 16:03, Richardson at 16:04, and Drum at 16:05 -- all more than twelve minutes before Chism at 16:15. Despite having direct personal knowledge of each officer's identity, Defendant Chism left the Assisting Officers field entirely blank.
39. The blank Assisting Officers field had operational consequences that extended beyond the face of the report. CCSO's body-worn camera footage is managed through the Visual Labs evidence management platform. Recordings within that system are

associated with incidents and officers through the entries made in CCSO's records management system. Because Defendants Arellano, McCarthy, and Drum were not entered as assisting officers in Incident Report No. 23-01223 -- the sole official incident record for the June 17, 2023 encounter -- their body-worn camera recordings had no documented evidentiary connection to that incident in the records system. Without such a connection, their footage carried no evidentiary designation within the Visual Labs platform, and was therefore subject to automatic expiration under the system's default retention setting. As confirmed by the Visual Labs audit log produced by Defendant Allen in January 2026, CCSO's platform is configured with a 180-day default retention period for all recordings. Footage with no evidentiary designation and no case connection would expire automatically after 180 days, with no manual intervention required and no administrative record specifically attributable to anyone at CCSO.

40. The criminal court dockets for JOS-23-1022 and JOS-23-1023 list Defendant Connor Richardson as the 'Officer' of record for both cases, while Defendant Chism is listed as the arresting officer in Incident Report No. 23-01223. Richardson and Chism are therefore separately and inconsistently linked to the criminal proceedings through different official documents. No official CCSO document -- not the incident report, not any supplemental report, not any CCSO-generated court filing -- connects Arellano, Drum, or McCarthy to Incident No. 23-01223 or to the criminal cases arising from it, despite the independent CAD log confirming all five deputies were present.

III. The FOIA Production, Evidence Destruction, and False Certifications

41. When Plaintiff sought body-worn camera footage in December 2025, the responses he encountered from CCSO revealed discrepancies regarding evidence retention. Plaintiff submitted Arkansas Freedom of Information Act (FOIA) requests seeking all BWC

footage and records related to Incident No. 23-01223 and the associated June 16-17, 2023 incidents. On December 15, 2025, Plaintiff sent his initial FOIA request to Brandon Shrader. Plaintiff sent a follow-up on December 18, 2025. Shrader responded that he had not received the December 15 request and forwarded Plaintiff's request to the Craighead County Sheriff's Office.

42. Defendant Starleigh Richardson, CCSO's FOIA custodian, handled Plaintiff's FOIA inquiry. On December 19, 2025, at approximately 9:15 a.m., Richardson sent Plaintiff an initial email acknowledging the request and stating, 'I am working on it and will get you the information I have available.' Eight minutes later, at approximately 9:23 a.m., she denied the request in writing, asserting that the incident 'belongs to the Jonesboro Police Department' and that CCSO had no jurisdiction or responsive records. Fourteen minutes after the denial, at approximately 9:37 a.m., she reversed course, apologized for the 'misinformation,' produced Incident Report No. 23-01223, and stated that all BWC footage had been deleted pursuant to a 180-day retention policy.
43. Plaintiff's FOIA inquiries were escalated to Defendant Jason Allen, then Assistant Chief Deputy. Allen asserted that all BWC footage had been destroyed on a 180-day retention schedule because the case was 'closed and adjudicated' in 2023, identifying September 11, 2023 as the relevant court date. Plaintiff obtained court dockets showing that September 11, 2023 was the dismissal date of a separate civil order-of-protection case (Case No. 16JDR-23-574), while the related criminal cases (JOS-23-1022 and JOS-23-1023) remained active until December 12, 2023. The version of Incident Report No. 23-01223 produced on December 19, 2025 still listed the case status as 'Active' on page 1.
44. Following the FOIA correspondence described herein, Plaintiff obtained his criminal case file from his former defense attorney. Upon reviewing this file, Plaintiff discovered that partial BWC footage from Defendants Richardson and Chism had

actually been produced to his attorney through a criminal discovery request filed on June 22, 2023. That discovery production did not include BWC footage from Defendants Arellano, Drum, or McCarthy, though CAD logs and records show they were present on scene and wearing cameras.

45. In response to Plaintiff's request for BWC deletion logs covering five deputies on June 16-17, 2023, Allen produced a single BWC audit document generated from the Visual Labs platform. Allen certified in writing that this document was 'the audit of the time and date of the retention of the video requested.'
46. The audit log produced by Allen as the certified responsive document is, on its face, non-responsive to Plaintiff's request. The document's own header identifies it as 'Video by Levi Chism on Mon Jun 19, 2023 21:47:52' -- a recording made on June 19, 2023, not on June 16 or June 17, 2023, the dates specifically identified in Plaintiff's FOIA request. The log covers a twenty-minute video with no incident number, no case designation, and no connection to Incident No. 23-01223 or to the events of June 16-17, 2023 that are the subject of this action. Allen certified this document in writing as fully responsive to Plaintiff's request for audit records covering five named deputies across two specific dates.
47. The non-responsive audit log nonetheless establishes one material fact: CCSO's Visual Labs evidence management platform is configured with a default retention setting of 180 days, as reflected in the log's 'Retention: 180 days' field. This setting exists as an operational software configuration within the Visual Labs platform. It does not appear anywhere in CCSO's written Body-Worn Camera policy, Version 1 Section 6, signed by Sheriff Marty Boyd -- a document Allen himself provided to Plaintiff. That written policy establishes no 180-day retention period. It requires that '[r]ecordings of a prosecutorial nature shall be kept until complete adjudication of any pending cases,' and that recordings known to pertain to civil matters be maintained for a minimum of

three years. The 180-day default that both Starleigh Richardson and Allen cited as the legal justification for destroying Plaintiff's footage is a software setting that directly contradicts CCSO's own written preservation policy.

48. Both Richardson's and Chism's BWC footage from June 17, 2023 was produced to Plaintiff's criminal defense counsel through the discovery process in cases JOS-23-1022 and JOS-23-1023, demonstrating that those recordings existed in the Visual Labs platform and were accessible at least through the period of criminal discovery in 2023. The Visual Labs platform generates and retains audit log records for every video from the moment of upload, including audit records for videos that have subsequently expired or been deleted. Defendant Allen, as the official responsible for CCSO's records, was therefore capable of producing Visual Labs audit logs for Richardson's and Chism's June 17 footage -- logs that would have documented when each recording was uploaded, accessed, modified, and when it reached 'Expired' status or was otherwise removed from the system. Allen did not produce those logs. He produced instead a single audit log for an unrelated June 19 recording and certified it as the complete response. The omission of the Richardson and Chism June 17 audit logs -- for footage known to have existed in the system -- is inconsistent with Allen's assertion that all footage was routinely deleted and no records remain, and Plaintiff contends no legitimate explanation for this omission has been provided.
49. In December 2025 and January 2026 FOIA correspondence, Defendant Starleigh Richardson, Defendant Jason Allen, and the prosecuting attorney in the underlying criminal cases have each represented, in substance, that no BWC footage from the June 16-17, 2023 incidents exists. This representation encompasses footage from all five responding deputies -- including Defendants Richardson and Chism. As stated above, Plaintiff later obtained his case file from his defense attorney and now possesses BWC footage from both Richardson and Chism that was produced during the 2023 discovery

process. The representation that no footage from those two officers exists is inconsistent with the fact that it was previously produced to Plaintiff's attorney. The simultaneous adoption by multiple officials of a position that Plaintiff contends is factually unsupportable is consistent with a mutual understanding that the existence of the footage must be denied, rather than the product of independent administrative error.

50. Plaintiff obtained two different printouts of Incident Report No. 23-01223. An earlier version printed on June 19, 2023 from his criminal-case file shows the 'Approving Officer' field left blank. A later version printed on December 19, 2025 in response to Plaintiff's FOIA request shows that the 'Approving Officer' field has been populated with 'Iglehart, Taylor.' Supervisor Taylor Iglehart is the same officer who, as captured on Richardson's BWC, denied Richardson's request for authorization to arrest Plaintiff. On information and belief, the insertion of Iglehart's name into the Approving Officer field was made after the incident and without Iglehart's contemporaneous review or approval of the report's contents. Plaintiff requested the RMS audit history for Incident No. 23-01223, including the change log for the Approving Officer field, in written correspondence with CCSO in January 2026. That request was not fulfilled in the correspondence that followed.
51. In the same email chain, Allen admitted that CCSO routinely deletes FOIA-related correspondence, stating that if someone 'FOIA any documents, they would be sent, and the email would be deleted.' Allen also stated that the Captain responsible for investigatory assignments had recently retired, and that he could not therefore speak to that Captain's record logs, retention decisions, and case assignments, including those relating to Incident No. 23-01223. Allen did not identify the retired Captain by name in this correspondence. On information and belief, based on CCSO's organizational structure and Allen's separate written identification of the Captain of Investigations as the official responsible for case assignment and closure decisions for Incident No.

23-01223, the retired Captain to whom Allen referred is Defendant Ron Richardson.

52. Plaintiff's preservation rights attached no later than June 22, 2023, when his criminal-defense counsel filed a formal motion for discovery in Cases JOS-23-1022 and JOS-23-1023 demanding production of all audio and video recordings. On December 31, 2025, Plaintiff sent a supplemental preservation notice. The destruction of BWC footage -- including the footage of Arellano, Drum, and McCarthy -- occurred while criminal cases remained pending until December 12, 2023, and while Plaintiff's anticipated civil claims were known to CCSO.
53. As Assistant Chief Deputy, Allen had direct institutional authority over all CCSO records regardless of any individual supervisor's retirement. County records belong to the county, not to any individual who previously held access to them. Allen's stated inability to speak to the retired captain's logs was not a lawful basis for withholding public records under Arkansas FOIA -- it was an abdication of the institutional responsibility he held by virtue of his office. If the retired captain to whom Allen referred is, as alleged on information and belief, Defendant Ron Richardson -- the father of Defendant Deputy Connor Richardson and the brother-in-law of Defendant Starleigh Richardson -- then Allen's invocation of that official's retirement as the stated basis for withholding records concerning his own family members' conduct allows the inference that access was denied to protect the involved officers rather than for any legitimate administrative reason.
54. Defendants Connor Richardson, Ron Richardson, and Starleigh Richardson are members of the same family. According to the publicly available obituary of Jodi Lynn Richardson, published by Thompson Funeral Home of Trumann, Arkansas in January 2023, Defendant Ron Richardson is identified as husband of the deceased and Defendant Connor Richardson is identified as their son. The obituary further identifies 'Steve and Starleigh Richardson of Jonesboro' among the surviving brother and

sister-in-law of the deceased. Steve Richardson is therefore the brother of Defendant Ron Richardson, and Defendant Starleigh Richardson is Steve Richardson's wife -- making Starleigh the sister-in-law of Defendant Ron Richardson and the aunt by marriage of Defendant Connor Richardson. Defendant Connor Richardson is accordingly the nephew of Defendant Starleigh Richardson. Defendant Ron Richardson, as Captain of Investigations, controlled the case assignment, case status, and evidence-retention decisions for Incident No. 23-01223. Defendant Starleigh Richardson, as FOIA custodian, was the first point of contact when Plaintiff sought public records. The familial relationship between the officer who controlled the case file, the officer who initiated the arrest, and the custodian who handled the records requests permits a reasonable inference of coordinated concealment.

55. Taken together -- (a) Starleigh Richardson's denial of jurisdiction and rapid reversal; (b) the claimed 180-day purge based on a policy provision that does not appear in CCSO's written BWC policy; (c) Allen's provision of a single non-responsive audit log certified as fully responsive to a request covering five deputies; (d) Allen's failure to produce audit logs for Richardson's and Chism's June 17 footage known to have existed in the system; (e) the post-hoc population of the Approving Officer field with Supervisor Iglehart's name; (f) the admitted practice of deleting FOIA-related emails; (g) Allen's invocation of a retired family member as justification for withholding investigatory assignment records; (h) Defendant Richardson's recorded statement "I want to arrest this mother fucker so bad"; (i) Richardson's withholding of Pennington's exculpatory admissions from both the supervisor call and the briefing to Chism; (j) Chism's omission of all assisting deputies from the incident report, which severed their footage from any evidentiary designation in CCSO's evidence management system; and (k) a representation by multiple officials that no BWC footage from the incident exists -- a representation that Plaintiff contends is false based on the footage he subsequently

recovered from his criminal defense attorney's case file.

56. Plaintiff's factual allegations are based upon body-worn camera footage, CAD records, incident reports, court records, audit logs, discovery materials, and written correspondence. Allegations made upon information and belief are specifically identified as such.

COUNT I

42 U.S.C. § 1983 -- Fourth Amendment False Arrest & Unlawful Detention **(Against Defendants Richardson, Arellano, Chism, Drum, and McCarthy)**

57. Plaintiff incorporates by reference paragraphs 1 through 56 as though fully set forth herein.
58. This Count arises from Defendants' decision to detain Plaintiff inside his home and to arrest him without a warrant and without probable cause.
59. At all relevant times, Plaintiff had a clearly established right under the Fourth Amendment to be free from unreasonable seizures, including detention in his home and arrest without a warrant and without probable cause.
60. On June 17, 2023, Defendants Richardson, Arellano, Drum, McCarthy, and Chism detained and arrested Plaintiff. At the time of arrest, officers possessed exculpatory information including the complainant's repeated denial that Plaintiff placed hands on her, her admission that she placed hands on Plaintiff, the absence of observable injury, and a supervisory refusal to authorize arrest. At no point did any officer articulate facts satisfying the elements of false imprisonment under Arkansas law; the alleged victim was already outside the residence upon officers' arrival, and no officer observed Plaintiff restrain her.
61. Despite these facts, deputies continued to detain Plaintiff in his kitchen, refused to allow him to leave his home, and placed him in handcuffs.

62. Defendant Richardson told other deputies that Plaintiff had previously been charged with assault third. Defendant Drum possessed personal knowledge of what had and had not been formally charged, having been present with Richardson at the hotel on June 16, yet did not correct Richardson's statement.
63. After Defendant Richardson exited the residence to contact his supervisor, Defendants Arellano and Drum remained inside alone with Plaintiff. Arellano escalated the encounter by threatening Plaintiff with an 'obstruction' charge. Plaintiff, without resisting or acting aggressively, actively and continuously protested the legality of the detention. During this ongoing protest, Arellano placed Plaintiff in handcuffs without a warrant or probable cause. Plaintiff continued to protest after being handcuffed, stating that he could not be detained for a 'secondary crime,' to which Arellano responded: 'I don't need a reason to detain you.' BWC footage from Defendants Arellano and Drum that would have captured these events has not been produced.
64. Defendant Chism arrived on scene after Supervisor Iglehart had denied authorization to arrest. While Chism was outside being briefed by Richardson, Defendant Arellano placed Plaintiff in handcuffs inside the residence. Richardson informed Chism of the supervisor's denial. Chism then entered the residence, rejected Plaintiff's request for a higher-ranking supervisor, and arrested Plaintiff within seconds of Plaintiff's invocation of his right to counsel.
65. Defendant McCarthy was present on scene throughout the encounter. At approximately 09:07 on Richardson's BWC, Richardson stated to McCarthy, 'I want to arrest this mother fucker so bad,' seconds after the supervisor denied authorization. McCarthy did not report or act on this statement. McCarthy's BWC footage from the encounter has not been produced and was reported deleted.
66. Defendants Drum and McCarthy were present during the unlawful detention and arrest and had a realistic opportunity to intervene to prevent or stop the constitutional

violations but failed to do so.

67. The conduct of Defendants Richardson, Arellano, Chism, Drum, and McCarthy was objectively unreasonable and violated clearly established Fourth Amendment law. No reasonable officer in Defendants' position could have believed that probable cause existed under these circumstances, where the sole complaining witness repeatedly denied any assault, admitted to initiating physical contact herself, and a supervising officer expressly declined authorization to arrest. As a direct and proximate result, Plaintiff was incarcerated for approximately two days and suffered emotional distress, reputational harm, economic loss, and other damages.

COUNT II

42 U.S.C. § 1983 – First Amendment Retaliatory Arrest

(Against Defendant Chism)

68. Plaintiff incorporates by reference paragraphs 1 through 56 as though fully set forth herein.
69. This Count arises from Defendant Chism's decision to arrest Plaintiff within seconds of Plaintiff invoking his right to counsel and questioning the deputies' conduct.
70. During the June 17, 2023 encounter, Plaintiff engaged in protected First Amendment activity by verbally challenging the deputies' conduct inside his home, questioning their authority to detain him, and requesting a higher-ranking supervisor.
71. After Defendant Chism arrived and was briefed by Defendant Richardson, he was aware that Supervisor Iglehart had denied authorization to arrest Plaintiff for assault third.
72. At approximately 00:26 on Chism's BWC, Plaintiff stated: 'I have nothing to say, I want an attorney.' Plaintiff's verbal challenge to officers and request for a supervisor constituted protected First Amendment activity, and his invocation of counsel further

underscores that he declined to participate in questioning.

73. Approximately three seconds later, at 00:29 on the same recording, Chism responded: 'Okay, well, you're under arrest for assault third,' and placed Plaintiff under arrest. The close temporal proximity allows the inference that Plaintiff's protected speech was a motivating factor in the arrest.
74. As set forth above, there was no independent or arguable probable cause to arrest Plaintiff at the time Chism decided to arrest him. Pennington had stated that Plaintiff did not put his hands on her; she admitted on BWC that she had been drinking and that she 'did have [her] hands on him'; neither person had any visible injuries; no deputy observed Plaintiff restrain Pennington; and Supervisor Iglehart had denied authorization to arrest Plaintiff. After the arrest, Chism stated on BWC, 'I don't know anything about marks on you.' No reasonable officer could conclude probable cause existed under these circumstances.
75. Defendant Chism's decision to arrest Plaintiff immediately after Plaintiff invoked his right to counsel, in the absence of probable cause and contrary to a supervisor's denial of authorization, would chill a person of ordinary firmness from continuing to exercise First Amendment rights. Defendant Chism's conduct therefore constituted a retaliatory arrest.
76. As a direct and proximate result of Defendant Chism's retaliatory arrest, Plaintiff was incarcerated for approximately two days and suffered damages to be proved at trial.

COUNT III

42 U.S.C. § 1983 -- Malicious Prosecution & Fabrication / Omission of Evidence **(Against Defendants Connor Richardson and Levi Chism)**

77. Plaintiff incorporates by reference paragraphs 1 through 56 as though fully set forth herein.

78. This Count arises from Defendants Richardson and Chism omitting material facts in reports and charging documents to initiate and continue criminal proceedings against Plaintiff, and from Chism's preparation of a narrative account describing an investigation that did not occur as described.
79. On June 17, 2023, Defendant Chism authored Incident Report No. 23-01223. In that report, Chism asserted that Plaintiff blocked the doorway, took the complainant's possessions, and caused her to be in extreme fear that Plaintiff would physically harm her.
80. In preparing Incident Report No. 23-01223, Defendant Chism omitted each of the material exculpatory facts set forth in paragraph 34 above, including Pennington's admissions regarding drinking and physical contact, Supervisor Iglehart's denial of authorization to arrest, the fact that Plaintiff was already in handcuffs when Chism entered the residence, the identities and roles of the assisting deputies, and the presence of the domestic-violence advocate. These omissions collectively created a false appearance of legitimate probable cause.
81. As established in paragraph 35 above, Chism's written narrative describes a deliberate investigative process -- speaking with Pennington, then with Plaintiff, then determining probable cause -- that his own body-worn camera directly contradicts. Chism entered the residence from Richardson's briefing, encountered Plaintiff already in handcuffs, heard Plaintiff invoke counsel, and announced the arrest within seconds. His later statement on BWC that he did not know anything about injuries to Plaintiff confirmed that no genuine investigation preceded the arrest. The incident report account is inconsistent with the chronological record established by Chism's own body-worn camera, in its sequencing and not merely in its omissions.
82. By omitting the supervisor's denial of arrest authorization, Plaintiff's prior handcuffing, Pennington's admissions, and the roles of the other deputies, Defendant Chism created

a misleading appearance of probable cause. These omissions were material and were relied upon in criminal proceedings against Plaintiff.

83. During the post-arrest assessment on Chism's BWC, Pennington admitted that she had been drinking and answered 'probably' when asked if she believed Plaintiff would 'try to legitimately end [her] life.' This response was omitted from the Incident Report.
84. As established above, the two versions of Incident Report No. 23-01223 reflect a post-hoc insertion of Supervisor Iglehart's name into the Approving Officer field -- the same supervisor whose denial of authorization Richardson omitted from his briefing of Chism. And as established above, Chism's BWC contains a three-minute audio gap during the period immediately following Plaintiff's arrest and prior to Chism's on-camera interview with Pennington. The post-hoc report alteration and the audio gap are each consistent with a deliberate effort to shape the official record after the fact.
85. Defendant Richardson likewise omitted material facts when initiating and maintaining Plaintiff's criminal cases. Despite personally hearing Pennington's admissions, Defendant Richardson: (a) described the incident to Supervisor Iglehart by telling Iglehart that Pennington 'felt like he was going to put hands on her' without disclosing her admissions regarding drinking and placing hands on Plaintiff; (b) omitted the same exculpatory admissions during his briefing of Defendant Chism; and (c) assisted in initiating criminal charges against Plaintiff after acknowledging on BWC that his supervisor had denied authorization to arrest.
86. As established above, criminal cases JOS-23-1022 and JOS-23-1023 were filed on June 19, 2023, with Defendant Connor Richardson listed as the 'Officer' of record on both dockets -- despite Chism having authored the incident report and being listed as the arresting officer therein.
87. Defendant Richardson caused and continued Plaintiff's prosecution by forwarding or providing the electronic citations and case-initiating documents to the court and

prosecutor, even though he knew that: (a) Pennington had stated that Plaintiff did not put his hands on her; (b) she admitted that she had been drinking and 'did have [her] hands on him'; and (c) Supervisor Iglehart had denied authorization to arrest.

88. But for the incomplete version of events supplied by Defendants Richardson and Chism, there would have been no probable cause, and no objectively reasonable basis to file or continue criminal charges against Plaintiff. At the time of arrest and initiation of charges, Defendants possessed exculpatory information including the complainant's repeated denial that Plaintiff placed hands on her, her admission that she placed hands on Plaintiff, the absence of observable injury, and a supervisory refusal to authorize arrest. Defendants' conduct was the proximate cause of the initiation and continuation of these criminal proceedings.
89. As a result of Defendants' conduct, Plaintiff was subjected to a six-month criminal prosecution. The nolle prosequi on December 12, 2023 constituted a favorable termination.
90. The conduct of Defendants Richardson and Chism directly and proximately caused Plaintiff's deprivation of liberty, including incarceration, a six-month criminal prosecution, emotional distress, and economic losses.

COUNT IV

42 U.S.C. § 1983 -- Civil Conspiracy

(Against Defendants Connor Richardson, Starleigh Richardson, and Jason Allen)

91. Plaintiff incorporates by reference paragraphs 1 through 56 as though fully set forth herein.
92. This Count arises from coordinated actions among Defendants Connor Richardson, Starleigh Richardson, and Jason Allen to conceal exculpatory evidence and obstruct access to public records.

93. On June 22, 2023, Plaintiff's criminal defense attorney filed a Motion for Discovery in JOS-23-1022 and JOS-23-1023 demanding production of all audio and video recordings. This filing placed the prosecuting attorney and Craighead County on formal notice to preserve all BWC footage.
94. Defendants Connor Richardson, Starleigh Richardson, and Jason Allen engaged in coordinated actions from which it may be inferred that there was an agreement or meeting of the minds to suppress evidence and misrepresent the status of that evidence.
95. On December 19, 2025, Starleigh Richardson denied the request in writing, asserting that the incident 'belongs to the Jonesboro Police Department' and that CCSO had no responsive records. Fourteen minutes later, she reversed course, produced Incident Report No. 23-01223, and stated that all BWC footage had been deleted pursuant to a 180-day retention policy.
96. Plaintiff's FOIA inquiries were escalated to Defendant Jason Allen. Allen asserted that all BWC footage had been destroyed on a 180-day retention schedule because the case was 'closed and adjudicated' in 2023, tying that closure to a September 11, 2023 court date. That court date was the dismissal of a separate civil order-of-protection case; the criminal cases remained active until December 12, 2023. Incident Report No. 23-01223 still listed the case status as 'Active.'
97. In response to Plaintiff's FOIA request for BWC audit and deletion logs for multiple deputies from June 16-17, 2023, Allen produced a single Visual Labs audit log for a Chism recording made on June 19, 2023 -- a date and a recording entirely unconnected to Plaintiff's case -- and certified that document in writing as 'the audit of the time and date of the retention of the video requested.' Both Starleigh Richardson and Allen cited an identical 180-day retention period as the basis for the destruction of footage. That figure does not appear anywhere in CCSO's written BWC policy. The convergence on the same non-existent policy provision, stated identically by two officials in

coordinated correspondence, is not consistent with independent administrative decision-making.

98. Allen's production of a non-responsive audit log -- for a June 19, 2023 Chism recording with no connection to Plaintiff's case -- and his written certification of that document as fully responsive to Plaintiff's specific request, constitutes a further overt act in furtherance of the conspiracy. Allen had institutional knowledge that Richardson's and Chism's June 17 footage had been produced in criminal discovery and therefore existed in the Visual Labs system. His failure to produce the audit logs for that known footage, while certifying an unrelated document as the complete response, is consistent with a deliberate effort to prevent Plaintiff from learning what those logs would reveal -- including whether each recording was auto-expired at 180 days, manually deleted, or deleted before the criminal cases were adjudicated on December 12, 2023.
99. The false representation that no BWC footage from the incident exists -- a position simultaneously maintained by Starleigh Richardson, Allen, and the prosecuting attorney in the underlying criminal proceedings -- appears inconsistent with the fact that Richardson's and Chism's footage was produced through those same criminal proceedings. The simultaneous adoption of a position inconsistent with the documented production of that footage is consistent with a shared understanding that the existence of the footage must be denied, rather than the product of independent administrative error.
100. In the same correspondence, Allen admitted that CCSO routinely deletes FOIA-related emails after they are processed, and asserted that he could not provide investigatory assignment logs or related records because the Captain of Investigations had recently retired. As Assistant Chief Deputy, Allen had direct institutional authority over all county records and no legitimate basis to assert that one official's retirement relieved him of the obligation to produce public records in his custody.

101. Defendant Connor Richardson's conduct created the need for the concealment averred herein. He participated in the arrest and initiated criminal charges while omitting exculpatory facts he personally knew. Defendant Chism's omission of all assisting deputies from the incident report -- drafted within hours of the arrest -- severed three deputies' BWC footage from any evidentiary designation in CCSO's records management system, creating the structural condition that allowed the default 180-day software setting to delete that footage without any named actor being required to manually remove it.
102. Taken together, the actions described herein constitute coordinated steps from which a meeting of the minds to accomplish an unlawful objective can be inferred. The temporal proximity, internal inconsistencies, coordinated responses, and mutual adoption of a factually false narrative are not plausibly explained by independent action. These actions were interdependent and mutually reinforcing.
103. The coordinated actions described above are consistent with a mutual understanding among Defendants Connor Richardson, Starleigh Richardson, and Jason Allen to deprive Plaintiff of his constitutional rights, and each took overt acts in furtherance of that objective as alleged herein.
104. As a direct and proximate result, Plaintiff was deprived of exculpatory evidence and suffered damages to be determined at trial.

COUNT V

42 U.S.C. § 1983 -- Municipal Liability (Monell)

(Against Defendant Craighead County, Arkansas)

105. Plaintiff incorporates by reference paragraphs 1 through 56 as though fully set forth herein.

- 106.** Defendant Craighead County is a local government entity that, at all relevant times, operated the Craighead County Sheriff's Office. Plaintiff's claims in this Count are based on: (a) the County's configuration of the Visual Labs body-worn camera evidence management platform; (b) the preparation and supervisory approval of Incident Report No. 23-01223 with the Assisting Officers field left blank; (c) written representations made by Assistant Chief Deputy Jason Allen in response to Plaintiff's Arkansas FOIA requests; and (d) the absence of any documented corrective response by Sheriff Boyd or County Judge Day following written notice of the discrepancies described herein.
- 107.** At all relevant times, the Craighead County Sheriff's Office was a department of Defendant Craighead County. The Sheriff and the County Judge were final policymakers for the County with respect to law-enforcement practices, BWC retention, records management, and discipline.
- 108.** The County's documented practices relevant to this case include: (a) the configuration of the Visual Labs BWC evidence management platform with a 180-day default retention setting applicable to all recordings, without any automated exception, flag, or hold mechanism tied to incident status, case number, active prosecution, or pending discovery request; (b) the preparation and supervisory approval of Incident Report No. 23-01223 with the Assisting Officers field left blank, despite the fact that multiple deputies responded to and recorded the incident on their body-worn cameras; (c) the written representation by Assistant Chief Deputy Allen that CCSO deletes FOIA-related email communications after processing; and (d) Allen's production and written certification of an audit log -- generated for a June 19, 2023 recording with no connection to this case -- as fully responsive to Plaintiff's records request for materials from June 16-17, 2023.

109. Craighead County configured its Visual Labs BWC evidence management platform with a universal 180-day default retention setting applicable to all recordings, regardless of whether the footage was associated with an active criminal prosecution, a pending civil claim, or a formal discovery request. CCSO's written BWC policy, Version 1 Section 6, requires that recordings 'of a prosecutorial nature shall be kept until complete adjudication of any pending cases.' The County maintained no training, procedure, or designated responsibility for overriding the platform's default setting when footage was connected to active criminal cases. As a result, the system's automatic deletion function operated as the de facto retention policy, superseding the written policy in practice. Criminal cases JOS-23-1022 and JOS-23-1023 were not adjudicated until December 12, 2023; a formal discovery motion had been on file since June 22, 2023; yet the County's records management practices contained no mechanism to prevent the platform's default deletion from running against footage associated with those pending prosecutions. This gap between written policy and operational practice, implemented at the system-configuration level, constitutes a municipal custom or practice that was the moving force behind the destruction of evidence in this case.
110. Incident Report No. 23-01223 was reviewed and approved by a supervisor within CCSO's records management system. The Assisting Officers field remained blank at the time of that approval. The Visual Labs BWC platform, as configured by the County, links officer footage to incident records through officer assignment entries. When an officer is not listed in the incident record, their footage is not associated with that incident in the platform and is subject to the system's default 180-day retention setting. The County's incident report procedures and its BWC platform configuration thus operated together in this case: the incomplete incident record left the footage recorded by Defendants Arellano, Drum, and McCarthy -- none of whom appear in the Assisting Officers field of Incident Report No. 23-01223 -- without any linkage to that

incident in the Visual Labs system, and without any mechanism to prevent the platform's default deletion setting from running against their recordings.

111. As one basis for municipal liability, Defendant Jason Allen made representations and certifications regarding CCSO's records and FOIA compliance in his official capacity as Assistant Chief Deputy. Those representations and certifications -- including his assertion of a 180-day retention period, his statement that CCSO deletes FOIA-related emails, and his written certification of a non-responsive audit log as fully responsive to Plaintiff's records request -- were not reviewed, modified, or contradicted by any superior officer in the correspondence that followed. *Pembaur v. City of Cincinnati*, 475 U.S. 469 (1986), provides that a single decision by an official exercising delegated final policymaking authority may constitute county policy.
112. As a separate and independent basis for municipal liability, Plaintiff provided written notice of the discrepancies, audit issues, retention issues, and records-management concerns to Sheriff Boyd and County Judge Day. Despite receiving notice, Plaintiff is unaware of any documented corrective action taken by these final policymakers in response to the discrepancies identified.
113. The bases for municipal liability set forth in paragraphs 109 and 110 are pled independently and in the alternative.
114. The practices and ratification described in paragraphs 107 through 113 directly affected the preservation of evidence in this case. The County's BWC platform configuration allowed the automatic deletion of footage from an incident with active criminal prosecutions. The incomplete incident record left three responding officers' footage unlinked from the incident in the platform. Allen's FOIA responses asserted a 180-day retention period not stated in CCSO's written BWC policy and produced an audit log for an unrelated recording, certified in writing as fully responsive. Sheriff Boyd and County Judge Day, having received written notice of those representations

and the discrepancies Plaintiff identified, took no documented corrective action. These are the County-level practices and decisions that Plaintiff contends caused the loss of body-worn camera evidence and the records management failures described in this complaint.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays for judgment against Defendants, jointly and severally, as follows:

- (a) Compensatory damages for physical liberty deprivation, extreme emotional distress, reputational harm, and economic losses, including lost wages, liquidated retirement savings, and lost employment opportunities;
- (b) Punitive damages against the individual Defendants to punish and deter their misconduct;
- (c) Declaratory judgment that Defendants' actions violated the First, Fourth, and Fourteenth Amendments;
- (d) Pre-judgment and post-judgment interest;
- (e) Nominal damages as to any claim for which compensatory damages cannot be established;
- (f) Such other and further relief as this Court deems just and proper; and
- (g) An award of reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988 should Plaintiff retain counsel or as otherwise permitted by law.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

VERIFICATION AND SIGNATURE

I, Devin Zayne Griffin, being duly sworn and proceeding pro se, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I have read the foregoing Complaint and that the factual allegations contained therein are true and correct to the best of my personal knowledge, information, and belief.

Respectfully submitted and executed on this 17th day of June, 2026.



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