

INSD Pro Se Civil Rights Complaint (unrelated to imprisonment) 12/19 (adapted from AO Pro Se 15 (Rev. 12/16))

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

Case No.

(to be filled in by the Clerk's Office)

Christopher Reiter and Tiffany Napier

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

see attached

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

FILED

SEP 30 2022

U.S. DISTRICT COURT
NEW ALBANY, INDIANA

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include *only*: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievances, witness statements, evidence, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

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I. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

(See Attached)

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

(See Attached)

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

(See Attached)

(See Attached)

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II. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Christopher Reiter		
Address	7119 Main Street NE		
	Lanesville	IN	47136
	<i>City</i>	<i>State</i>	<i>Zip Co</i>
County	Harrison		
Telephone Number	(502) 819-5040		
E-Mail Address	1greatcontractor@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Jamey Noel		
Job or Title <i>(if known)</i>	Chief Of Clark County Sheriff Department		
Address	501 E Court Avenue #159		
	Jeffersonville	IN	47130
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Clark		
Telephone Number	(812) 283-4471		
E-Mail Address <i>(if known)</i>			

☒ Individual capacity ☒ Official capacity

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Defendant No. 2

Name

Donovan Harrid

Job or Title *(if known)*

Captain of Narcotics Division

Address

501 E Court Avenue #159

Jeffersonville

IN

47130

City

State

Zip code

County

Clark

Telephone Number

(812) 283-4471

E-Mail Address *(if known)*

Individual capacity



Official capacity

Defendant No. 3

Name

Bradley Kramer

Job or Title *(if known)*

Sr. Road Officer

Address

501 E Court Avenue #159

Jeffersonville

IN

47130

City

State

Zip Code

County

Clark

Telephone Number

(812) 283-4471

E-Mail Address *(if known)*

Individual capacity



Official capacity

INSD Pro Se Civil Rights Complaint (unrelated to imprisonment) 12/19 (adapted from AO Pro Se 15 (Rev. 12/16))

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A.** Where did the events giving rise to your claim(s) occur?

7119 Main Street NE, Lanesville, IN 47136

- B.** What date and approximate time did the events giving rise to your claim(s) occur?

September 30, 2020 at approximately 8:30PM

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

(See Attachment)

INSD Pro Se Civil Rights Complaint (unrelated to imprisonment) 12/19 (adapted from AO Pro Se 15 (Rev. 12/16))

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

See Attached

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

(See Attachment)

VI. Certification and Closing


Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 09/30/2022

Signature of Plaintiff

Printed Name of Plaintiff


Christopher L. Reiter

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

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If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

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State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

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A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 09/30/2022

Signature of Plaintiff

Printed Name of Plaintiff

Tiffany Napier
Tiffany Napier

Plaintiff No. 2

Name	<u>Tiffany Napier</u>
Address	<u>7119 Main Street NE</u>
	<u>Lanesville, IN 47136</u>
County	<u>Harrison</u>
Telephone Number	<u>(812) 801-9972</u>
E-Mail Address	<u>tiffanyn1122@gmail.com</u>

Defendant No. 4

Southeast Indiana Regional SWAT Team

311 Hauss Square

New Albany, IN 47150

Floyd County

(812) 285-6264

Individual capacity Yes

official capacity Yes

Defendant(s) Attachment

Defendant No. 5

Donnie Boyer

Criminal Investigator

Clark County Prosecutor's Office

501 E Court Avenue #215

Jeffersonville, IN 47130

Clark County

(812) 285-6264

Individual capacity Yes

Official capacity Yes

Defendant No. 6

James Haehl

Major

Clark County Sheriff's Department

501 E Court Avenue #159

Jeffersonville, IN 47130

Clark County

(812) 284-4471

Individual Capacity Yes

Official Capacity Yes

Defendant(s) Attachment

Defendant No. 7

Jeremy Mull

Prosecutor

Clark County Prosecutor's Office

501 E Court Avenue #215

Jeffersonville, IN 47130

Clark County

(812) 285-6264

Individual capacity Yes

Official capacity Yes

Defendant No. 8

August Vissing

Road Officer

Clark County Sheriff's Department

501 E Court Avenue #159

Jeffersonville, IN 47130

Clark County

(812) 283-4471

Individual capacity Yes

Official capacity Yes

Defendant(s) Attachment

Defendant No. 9

Randy Burton

Road Officer

Clark County Sheriff's Department

501 E Court Avenue #159

Jeffersonville, IN 47130

Clark County

(812) 283-4471

Individual capacity Yes

Official capacity Yes

Defendant No. 10

Jerold Tenney

Major

Clark County Sheriff's Department

501 E Court Avenue #159

Jeffersonville, In 47130

Clark County

(812) 283-4471

Individual capacity Yes

Official Capacity Yes

Defendant(s) Attachment

Defendant No. 11

Mark Collett

Sr. Road Officer

Clark County Sheriff's Department

501 E Court Avenue #159

Jeffersonville, IN 47130

Clark County

(812) 283-44711

Individual capacity Yes

Official capacity Yes

Defendant No. 12

Laura Basham

Criminal Investigator

Clark County Prosecutor's Office

501 E Court Avenue #215

Jeffersonville, IN 47130

Clark County

(812) 285-6264

Individual capacity Yes

Official capacity Yes

Defendant(s) Attachment

Defendant No. 13

Troy McDaniel's

Southeast Indiana Regional SWAT Team Commander

Floyd County Sheriff's Department

311 Hauss Square

New Albany, IN 47150

Floyd County

(812) 948-5400

Individual capacity Yes

Official capacity Yes

Defendant No. 14

Nathan Banet

Southeast Indiana Regional SWAT Team Lead

Harrison County Sheriff's Department

1445 Gardner Lane NW

Cordon, IN 47112

Harrison County

(812) 738-2195

Individual capacity Yes

Official capacity Yes

Defendant(s) Attachment

Defendant No. 15

Sean O'Sullivan

Southeast Indiana Regional SWAT Team Operator

Harrison County Sheriff's Department

1445 Gardner Lane NW

Cordon, IN 47112

Harrison County

(812) 738-2195

Individual capacity Yes

Official capacity Yes

Defendant N. 16

Ryan Hutchinson

Southeast Indiana Regional SWAT Team Operator

Harrison County Sheriff's Department

1445 Gardner Lane NW

Cordon, IN 47112

Harrison County

(812) 738-2195

Individual capacity Yes

Official capacity Yes

Defendant(s) Attachment

Defendant No. 17

Zachary Skaggs

Southeast Indiana Regional SWAT Team Operator

Clarksville Police Department

1970 Broadway Street

Clarksville, IN 47129

Clark County

(812) 288-7151

Individual capacity Yes

Official capacity Yes

Defendant No. 18

Ken Haas

Southeast Indiana Regional SWAT Team Lead

Floyd County Sheriff's Department

311 Hauss Square

New Albany, IN 47150

Floyd County

(812) 948-5400

Individual capacity Yes

Official capacity Yes

Defendant(s) Attachment

Defendant No. 19

Brad Scott

Southeast Indiana Regional SWAT Team Observer

Floyd County Sheriff's Department

311 Hauss Square

New Albany, IN 47150

Floyd County

(812) 948-5400

Individual capacity Yes

Official capacity Yes

Defendant No 20

Ryan Roederer

Southeast Indiana Regional SWAT Team Operator

Clarksville Police Department

1970 Broadway Street

Clarksville, IN 47129

Clark County

(812) 288-7151

Individual capacity Yes

Official capacity Yes

Defendant(s) Attachment

Defendant No. 21

Ryan Yeager

Southeast Indiana Regional SWAT Team Operator

Harrison County Sheriff's Department

1445 Gardner Lane NW

Cordon, IN 47112

Harrison County

(812) 738-2195

Individual capacity Yes

Official capacity Yes

Defendant No 22

Scott Maples

Clark County Sheriff Department Chief Deputy

Clark County Sheriff's Department

501 E Court Avenue #159

Jeffersonville, IN 47130

Clark County

(812) 283-3371

Individual capacity Yes

Official capacity Yes

Defendant(s) Attachment

Defendant No. 23

Clark County Sheriff's Department

Sheriff's Department

501 E Court Avenue #159

Jeffersonville, IN 47130

Clark County

(812) 283-4471

Individual capacity Yes

Official capacity, Yes

Defendant No. 24

Harrison County Sheriff's Department

Sheriff's Department

1445 Gardner Lane NW

Cordon, IN 47112

Harrison County

(812) 738-2195

Individual capacity Yes

Official capacity Yes

Defendant(s) Attachment

Defendant No. 25

Clarksville Police Department

Police Department

1970 Broadway Street

Clarksville, IN 47129

Clark County

(812) 288-7151

Individual capacity Yes

Official capacity Yes

Defendant No. 26

Floyd County Sheriff's Department

Sheriff's Department

311 Hauss Square

New Albany, IN 47150

Floyd County

(812) 948-5400

Individual capacity Yes

Official capacity Yes

Basis for Jurisdiction

1. All Defendants reside, may be found, or transact business within the Southern District of Indiana.
2. This Court had personal Jurisdiction over the Defendants who at all times relevant conducted business in the Southern District of Indiana.
3. This Venue is appropriate in the Court because of the proximity of this Court to all the Defendants.

Parties

4. Plaintiffs, Christopher Reiter and Tiffany Napier, are people of the full age of majority and at all times relevant were residents of Lanesville, Indiana.
5. Defendants, Southeast Indiana Regional SWAT Team, is a county governed agency in the Southern District of Indiana and operates and governs the Southeast Indiana Regional SWAT Team pursuant to the laws of the County and State. In this case, Defendants of the Southeast Indiana Regional SWAT Team employees and servants including: Ryan Yeager, Ryan Hutchinson, Nathan Banet, Sean O'Sullivan, Ryan Roederer, Zachary Skaggs, Troy McDaniels, Ken Haas and Brad Scott acted through their respective agencies, employees, and servants at all times relevant including: Harrison County Sheriff's Department, Floyd County Sheriff's Department, Clarksville Police Department, and possibly Clark County Sheriff's Department and were under the command of Defendant Troy McDaniels at all times relevant.
6. Defendant, Harrison County Sheriff's Department, is a law enforcement agency and at all times is responsible for ensuring lawful practices of it's employees at all times relevant.
7. Defendant, Clark County Sheriff's Department, is a law enforcement agency and at all times is responsible for ensuring lawful practices of it's employees at all times relevant..

8. Defendant, Floyd County Sheriff's Department, is a law enforcement agency and at all times is responsible for ensuring lawful practices of its employees at all times relevant. .
9. Defendant, Clarksville Police Department, is a law enforcement agency and at all times is responsible for ensuring lawful practices of its employees at all times relevant..
10. Defendant, Clark County Prosecutor's Office, is a government agency and at all times is responsible for ensuring lawful practices of its employees at all times relevant..
11. Defendant, Bradley Kramer, is an employee at Clark County Sheriff's Department and is responsible for supervising the process regarding the search warrant that lead to the events that occurred on September 30, 2020.
12. Defendant, Donovan Harrod, is an employee at Clark County Sheriff's Department and is responsible for leading the narcotics division for the agency.
13. Defendant, August Vissing, is an employee at Clark County Sheriff's Department and is responsible for enforcing traffic laws as a "Road Officer".
14. Defendant, Jamey Noel, is the chief of staff of Clark County Sheriff's Department and is responsible for all aspects of the Clark County Sheriff's Department and its agents.
15. Defendant, Scott Maples, is the assistant Chief Deputy at Clark County Sheriff's Department and is responsible to oversee all investigatory procedures of its agency.
16. Defendant, James Haehl, was an employee at Clark County Sheriff's Department and was responsible for lawfully conducted investigations as a "Major" for the agency.
17. Defendant, Jerold Tenney, is an employee at Clark County Sheriff's Department and is responsible for enforcing traffic laws.
18. Defendant, Mark Collett, is an employee at Clark County Sheriff's Department and is responsible for enforcing traffic laws.
19. Defendant, Randy Burton, is an employee at Clark County Sheriff's Department and is responsible for enforcing traffic laws as a "Captain" for the agency.

20. Defendant, Laura Basham, is an employee at Clark County Prosecutor's Office and is responsible for lawfully conducted investigation.
21. Defendant, Donnie Boyer, is an employee of Clark County Prosecutor's Office and is responsible for lawfully conducted investigation.
22. Defendant, Jeremy Mull, is an employee at Clark County Prosecutor's Office and is responsible for investigating, litigating, and disposing of criminal charges, consistent with the interests of justice and with due regard for fairness, accuracy, and rights of the defendant, victims, and witnesses.
23. Defendant, unknown officer 1 (uniformed), is an employee at "respective government agency" and is responsible for some of the Constitutional violations later listed in "FACTS" below.
24. Defendant, unknown officer 2, (plain clothed), is an employee at "respective government agency" and is responsible for some of the Constitutional violations later listed in "FACTS" below.

FACTS

25. The events that lead up to the date of injuries/damages, on September 30, 2020, began on approximately August 14, 2020.
26. Christopher Reiter (plaintiff) was informed of the death of his uncle James Welch (deceased) who was a resident of Broward County, Florida.
27. Jade Passmore (mother of plaintiff) was the one who informed Mr. Reiter of his uncle's death.
28. Mrs. Passmore informed Mr. Reiter that he was the person named as the individual who was decided to handle Mr. Welch's estate in regards to collecting/distributing and finalizing everything.
29. Mr. Reiter and Tiffany Napier (plaintiffs) drove down to Broward County FL, on the 15th

of August.

30. Mr. Reiter and Ms. Napier arrived on or around August 16th early in the morning.

31. Mr. Reiter immediately contacted Detective Brian Tutler (Broward County, Florida Investigating Officer who was acting under the color of law) who was handling his uncles case and acting as the investigator for the probate courts in regards to Mr. Welch's death.

32. Detective Tutler provided Mr. Reiter with instructions on how to properly distribute Mr. Welch's estate per the will left by Mr. Welch.

33. Copies of Mr. Welch's last will and testament were later sent to Mr. Reiter via E-mail by Investigator Tutler.

34. Mrs. Passmore (mother of plaintiff) provided a large moving truck for Mr. Reiter and Ms. Napier to load all of the items that Mr. Welch had left to her and Mr. Reiter's two sisters (Katherine Materallie and Nicole Dobbs) in preparation for Mrs. Materallie (flown down to Florida) to drive back to Indiana.

35. The will specified that the Harley Davidson Motorcycle (VIN # 1HD1PLF145Y950984) and "Arising" trailer (VIN#5YCB0817KH002660) would be handled by Mr. Reiter as to what he chose to do with those particular property items.

36. Also included in items stated in the will that were to go to Mr. Reiter were a couple of totes with pictures, trinkets, and birthday presents that were specifically labeled to be inherited by Mr Reiter, by notes that had been left behind by the deceased Mr Welch.

37. During the drive back to Indiana Mrs. Passmore began making threats to cause harm to our horses and dog in retaliation for not being the recipient of the previously stated motorcycle and trailer.

38. Mr. Reiter contacted the Clark County Indiana Sheriff's Department on approximately August 23rd to report the harassment and threats Mr. Reiter and Ms. Napier were were receiving being made by Mrs. Passmore.

39. On August 25th Mr. Reiter and Ms. Napier called Clark County Sheriff's Department emergency line when finding Mrs. Passmore on Mr. Reiter's horse farm property opening the gates to the pasture and leaving them wide open allowing the horses to escape, and attempting to pour antifreeze into the horses drinking water.

40. This was witnessed by Officer Randy Burton who was acting as a responding Officer of Clark County Sheriff's Department and was on duty at that time.

41. Mr. Reiter's property is adjacent to 11618 Cortner Road, Marysville, IN 47141. (This property does not have it's own physical property address.)

42. Officer Randy Burton (Clark County Indiana Sheriff Department) was the responding officer to the 911 call made by Mr. Reiter and Ms.Napier on August 25th.

43. At that time Officer Randy Burton was provided with ALL of the proof of rightful possession information/documentation as well as copies of the documents that had been E-mailed to Mr. Reiter by Investigator Tutler (Broward County, Florida) proving legal possession of the motorcycle, trailer, and associated documentation that were later documented in the warrant was in fact intended to be in the possession/ownership to Mr. Reiter per James Welch's will.

44. At that time, Officer Burton refused/failed to take any type of legal action against Mrs. Passmore, whom he had physically witnessed trying to cause harm to Mr. Reiter and Ms. Napier horses (IC-35-46-3).

45. Officer Burton ordered that we should all follow the will "as it read" in regards to the estate and told Mr. Reiter to "keep the motorcycle and trailer safe" at his own residence (7119 Main Street NE, Lanesville, IN 47136).

46. Officer Burton under the color of law and in authority of his official capacity then advised Chris and Tiffany to "move all of our animals away from Jade Passmore in order to keep them safe" causing Mr Reiter to be forced to abandoned his own property.

47. On approximately September 18th Officer Burton called Mr. Reiter asking if the motorcycle and trailer were still at our residence (Lanesville, Indiana) and safe.

48. Officer Burton also stated that some “weird stuff might be happening with Jade showing some sort of papers to the police about the motorcycle.”

49. Mr. Reiter responded, “yes, they are safe and at our house and that we also still have the titles to both the motorcycle and trailer” which had not left our possession since being lawfully obtained during the execution of the probate courts requests to vacate the property of Mr. Welch's residence .

50. Mr. Reiter also asked Officer Burton if we “ could let them (Clark co Sheriff's department) hold the motorcycle and trailer until everything goes through Probate Court”.

51. Officer Burton responded, “no, just keep it at your house in Lanesville.”

52. On September 30, 2020 at approximately 8:30 PM, just after we had dinner, our internet stopped working (which was later confirmed as being shut off by members of the Clark co Sheriff's department).

53. After resetting the modem several times Mr. Reiter went back to the bedroom, where Ms. Napier was in bed, to wait for the internet modem to restart.

54. Suddenly something very heavy slammed into the “back” door to our home..

55. Our dog (Diesel) ran straight to the back door and Mr. Reiter immediately followed.

56. Mr. Reiter opened the door without any hesitation to see a large group of heavily armed SWAT Team Officer pointing their guns directly at him, with the lasers pointed at his vital areas.

57. At that moment one of the firearms were discharged and Mr. Reiter screamed, “ why are you shooting? Please, stop shooting.” and put his hands in the air.

58. Dressed only in his “pajamas” and obviously completely unarmed, Mr Reiter complied without hesitation to get down on his knees and extended his hands behind his back to Officer Troy McDaniels (Who was acting on duty and in his official role as the Commander of the

Southeastern Indiana Regional SWAT team) so that Commander McDaniels could place the handcuffs on Mr. Reiter.

59. As Officer McDaniels was placing the handcuffs on Mr. Reiter, Donovan Harrod (who was acting on duty and in his official role as the Clark County Indiana Sheriff's department as Captain of Narcotics) came running up the driveway, jumped over the porch divider, and grabbed Mr. Reiter in a "full nelson" position from behind and began to pick him up slamming his head into the porch awning while Mr Reiter was in handcuffs.

60. Officer Harrod then dragged Mr Reiter backwards towards the driveway where a heavy metal horse trailer was parked and began slamming Mr Reiter's head and face into the side of the trailer while simultaneously hitting him in the back of the head with the butt of his pistol.

61. Officer Harrod then slammed Mr. Reiter's face first, onto the concrete and started hitting him with the firearm in the back of the head while pressing his knees into Mr Reiter's legs, buttocks and lower back.

62. Officer Donovan Harrod then proceeded to punch Mr. Reiter in the ribs, lower back and spine.

63. At that point two other Officers of the Regional SWAT team also jumped on Mr. Reiter to "assist" Officer Harrod in beating Mr. Reiter who was already detained and had always been completely compliant and had not resisted in any way.

64. During the time this was happening Ms. Napier had also come out of the house and was complying with the orders of Commander McDaniels.

65. Mr. Reiter heard Ms. Napier (who had began recording right after the firearm was discharged) and ask her if she was still recording.

66. Ms. Napier stated, " yes, I am still recording", at which point Officer Donovan Harrod gave Mr. Reiter another blow to the head with his weapon and then used Mr. Reiters body (stepping on Mr. Reiter's neck) to push himself up off the ground. Once Officer Harrod was on

his feet he ran toward Tiffany to get her cell phone.

67. When Officer Harrod reached Ms. Napier he grabbed her right hand/wrist (this is the hand Ms Napier's phone had just been in as she was in the process of giving the phone to

Commander Troy McDaniels) and jerked her arm in a downward motion with great and unnecessary force causing obvious immediate serious physical injury to her back and shoulder.

68. Commander Troy McDaniels was still standing in very close proximity during this action and was the one who de-escalated the situation once he realized what was going on by saying, "okay everyone, lets just calm down" and putting his hand up to signify "stop".

69. At this point Mr. Reiter is then lifted to his feet and sat down on the porch divider wall while Ms. Napier was sent into the residence to get our dog (Diesel) into his harness and on his leash so he could be brought outside as Mr Donovan Harrod was suggesting to "kill the dog".

70. While Ms. Napier was inside the residence preparing to bring Diesel (the family dog) outside an officer claimed that "the dog is fighting her" (he was not).

71. Officer Donovan Harrod again requested permission to "shoot Diesel" (he had been consistantly requesting permission to "shoot the dog" since making contact with Mr. Reiter).

72. Once Ms. Napier had brought Diesel outside, the SWAT Officers started to enter our home.

73. Mr. Reiter said, "so whats the warrant for before you guys go in, I don't even know what the warrant is for?"

74. Regional SWAT along with Officer Harrod (who rushed down into our basement and started knocking shelves over and destroying our private property during his "search" of our residence) proceeded into our residence (a house we rent and the property owner was not made aware that a warrant was going to be executed at his residence) and Commander Troy McDaniels responded that we "would get a copy of the warrant."

75. Mr. Reiter then ask the Officers, "did someone say we have stolen property?"

76. Mr. Reiter received the response that "we would find it all out in a minute".

77. Once an initial search of our property was done there was an okay given for “plain clothes guys” to go in and then we were taken inside also.

78. Ms. Napier was seated on a wooden stool in the kitchen and Mr. Reiter was standing in the kitchen where Commander McDaniels was switching his handcuffs from behind his back to the front of his body.

79. Tiffany raises her phone up to make sure to record that Mr. Reiter was detained in handcuffs.

80. August Vissing, sneaking up behind Ms Napier, then proceeded to shut off Ms. Napier's recording and forcefully throw her phone at the stove top causing the screen to shatter while stating that “we were not allowed to record”.

81. The Clark co officers aggressively searched the residence (including both of Mr. Reiter's vehicles, boat, garage, and Ms. Napier's vehicle) for approximately 4.5 hours.

82. Ms. Napier stated several times throughout, “my adrenaline is worn off and I am really hurt,”.

83. Mr. Reiter and Ms. Napier both repeatedly asked for an EMT for Ms. Napier. The response they received is that “we will be done soon.”

84. Several hours later, Ms. Napier was finally allowed to give Supervisor Kramer all of the documents, keys and personal effects (the items Mr. Welch had on his person when he committed suicide). All of which we had repeatedly offered to give them throughout the entire event.

85. The documents included in what Ms. Napier gave Supervisor Kramer was a printed copy of the correspondence between Officer Tutler and Mr. Reiter, the titles to the motorcycle and trailer, and copies of Mr. Welch's will. This is the exact same information that we previously provided to Clark Co officer Randy Burton on August 26th.

86. The Clark co officers intentionally avoided collecting the items listed on the warrant until

after they searched every inch of our private property extensively.

87. After receiving everything that was listed on the warrant Officer Harrod and Officer Vissing continued to search our home and continuously ask Mr. Reiter and Ms. Napier, “where are the drugs?”

88. At one point officer Aj Vissing came in to the room where they had us detained and screamed “give us the combination to your safe or we will blow the whole F***** house up”.

89. Mr. Reiter and Ms. Napier responded, “there are not any drugs here, we do not do drugs.” and provided the combination to the safe aloud.

90. At the end of the Officers search of our home Mr. Reiter helped Officer Harrod get the bike trailer hooked up as well as his own trailer that was also listed on the warrant as “stolen”. 91.

Several roll backs were requested from Furnish Towing in Henryville and upon arrival they were loaded up with all of the totes in our home (the majority of them containing home decorations and personal property not pertaining to nor listed on the warrant)

92. Then taken back to the Clark county impound to be stored along with the two trailers and motorcycle.

93. Approximately 4 hours into the search, Mr Reiter was released from handcuffs and officer Kramer finally produced and explained the warrant.

94. Officer Donovan Harrod told Mr Reiter that “all of this is your Moms fault” and then asked for a beer.

95. After all of the officers left, we went to the hospital.

96. Approximately 3 weeks later Mr. Reiter received a call from Major James Haehl and Investigator Donnie Boyer who both stated that the property that had been taken from our residence had been released back to Mr Reiter and that he could pick them up any time he was ready to get them.

97. After receiving property release information, Mr. Reiter contacted Furnish Towing (The

Clark Co impound) and was learned that there was a storage fee that had to be paid before the items could be picked up.

98. Mr. Reiter then reached out to Major Haehl who was acting under the color of his position at Clark County Sheriff's Department to see if the fee could be waived or lowered.

99. Donnie Boyer Clark co prosecutors office, contacted Mr. Reiter and stated that "the Clark Co sheriffs office could waive those fees".

100. Donnie Boyer stated that Jeremy Mull (Clark co prosecutor) would not be pursuing charges

101. Donnie Boyer stated that "Jeremy Mull has decided to release the property back to Mr Reiter."

102. Donnie Boyer stated that "prosecutor Jeremy Mull has informed the Clark co Sheriffs department and has instructed them of what to do".

103. During the time Mr. Reiter and Ms. Napier were waiting on the fees to be waived/lowered the property was picked up by Robert Matarallie (Mrs Matarellie's husband) and believed to have been taken to the residence of Mrs. Passmore.

104. A facebook marketplace listing was sent to Mr Reiter showing that the motorcycle was listed "for sale" shortly after the property was released to Mr Matarelli.

105. Robert Matarelli was not intended to be the recipient of any property in Mr. Welch's estate.

VIOLATIONS OF 42 U.S.C. 1983

Deliberately Indifferent Policies, Practices, Customs, Training, and is in violation of the

Fourth, Fifth, Eighth, and Fourteenth and 18 U.S.C. 371

106. Christopher Reiter and Tiffany Napier have reason to believe that Defendants Donovan Harrod, Bradley Kramer, and August Vissing and under the color of law and as agents representing the Clark County Sheriff's Department, acted in conspiracy (18 U.S.C. 371) to willfully and knowingly proceed with a search warrant using falsified information (lack of

providing available evidence) as even one of their own sworn officers (Randy Burton) swore that documentation existed to the contrary in belief that the items (later listed in the warrant) were lawfully in possession of Mr. Reiter's (resident) prior to the request for obtaining the warrant. There is evidence to believe that these officers wanted to gain access to the home in suspicion of significant drug involvement/activity based on hearsay allegations alone, and did not have justifiable reasonable suspicion of evidence to support/procure a search warrant for drugs. These officers were fully aware (backed by substantial amount of evidence) that conducting such a procedure would result in the interference of an ongoing civil matter regarding an estate that was in the probate process.

107. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation to our belief that Clark County Officers: Bradley Kramer, Donovan Harrod, and August Vissing, under the color of their positions of Clark County Sheriff's Department, falsified probable cause by intentional fabrication and omission of available evidence knowingly and intentionally, clearly violating Christopher Reiter and Tiffany Napier's Fourteenth amendment rights.

108. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that Clark County Officer Donovan Harrod acted as an Officer of the Clark County Sheriff's Department with unreasonable and unnecessary use of excessive force on September 30, 2020 knowingly and intentionally, clearly violating Christopher Reiter and Tiffany Napier's Fourth amendment rights.

109. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that Clark County Officer August Vissing purposefully and intentionally violated Tiffany Napier and Christopher Reiter's First Amendment Right by physically grabbing Ms. Napier's recording device (phone) and intentionally turning off the recording and breaking the phone.

110. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that Clark County Officers Donovan Harrod, Bradley Kramer, and August Vissing purposefully and

intentionally violated Christopher Reiter and Tiffany Napier's Fourteenth Amendment, as the acting officers for The Clark County Sheriff's Department, tasked with the duties of conducting this case by not following policies and procedures set forth by Clark County Sheriff's Department and by law.

111. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that Jamey Noel, as the County Sheriff's Department Chief, is responsible and tasked with the duty of ensuring proper procedures, practices, and conduct of all it's employees and in accordance to laws.

112. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that Donnie Boyer, as the Investigator for the Clark County Prosecutor's Office, knowingly and intentionally violated Mr. Reiter's Fifth Amendment Right by failing to ensure that the property that was seized from Mr. Reiter's possession on September 30, 2020 was properly returned to its rightful owner.

113. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that Laura Basham, as the Investigator for the Clark County Prosecutor's Office, knowingly and intentionally violated Mr. Reiter's Fifth Amendment Right by failing to ensure that the property that was seized from Mr. Reiter's possession on September 30, 2020 was properly returned to its rightful owner.

114. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that Jeremy Mull, as the Prosecutor of Clark County Prosecutor's Office is responsible and tasked with the duty of ensuring proper procedures, practices, and conduct of all it's employees and in accordance to all laws.

115. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that the prosecution of this case was done in malice because the investigation was done based on falsified information and omission of available information against the Fourteenth Amendment.

116. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that as the Commander of the Southeast Indiana Regional SWAT Team, Troy McDaniels, being duly responsible for the policies, practices and procedures of the members the SWAT Team, violated Christopher Reiter and Tiffany Napier's Fourth Amendment Right by using excessive force when using a "ram" and discharging a weapon to gain entry into Christopher Reiter and Tiffany Napier's residence when no resistance to being willfully allowed in by Mr Reiter or Ms Napier existed.

117. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that, Donovan Harrod, acting as an officer for the Clark County Sheriff's Department and two (unknown) officers acting as employees of the Southeast Indiana Regional SWAT Team, knowingly and intentionally violated Christopher Reiter's Eighth Amendment Right by committing cruel and unusual punishment when unnecessarily and unreasonably beating Mr. Reiter while he was in handcuffs and had been fully compliant the entire time.

118. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that Donovan Harrod, August Vissing and Bradley Kramer, acting officers for the Clark County Sheriff's Department, knowingly and intentionally violated Christopher Reiter's Eighth Amendment Right when they unnecessarily and unreasonably kept Mr. Reiter in handcuffs the entire time they were searching the residence even after the Clark County Sheriff's Department officers knew that the criminal allegations against Christopher Reiter were untrue and that he posed no risk to the safety of himself or others.

119. Plaintiffs, Christopher Reiter and Tiffany Napier, allege under affirmation that August Vissing, Donovan Harrod and Bradley Kramer acting officers for the Clark County Sheriff's Department and Troy McDaniels acting officer for Southeast Indiana Regional SWAT Team, and two unknown officers acting under the color of their respective agency, knowingly and intentionally violated Tiffany Napier's Eighth Amendment Right by cruel and unusual

punishment when refusing to get Tiffany Napier Emergency Medical Care while being fully aware that an immediate injury existed against their policies and procedures.

120. Plaintiff, Tiffany Napier, alleges under affirmation that Donovan Harrod acting as an officer for the Clark County Sheriff's Department as an on-duty Officer knowingly and intentionally violated Tiffany Napier and Christopher Reiter's Fifth and Eighth Amendment Rights of incrimination and malicious prosecution by attempting to force Tiffany Napier to say that Christopher Reiter was responsible for breaking Tiffany Napier's back and committing domestic violence when there was not any factual or reasonable suspicion to consider the claim.

121. Plaintiffs, Christopher Reiter and Tiffany Napier, alleges under affirmation that Randy Burton acting as a responding officer for the Clark County Sheriff's Department, to a 911 emergency call made by Christopher Reiter violated Christopher Reiter's Fifth Amendment Right by knowingly and intentionally ordering Christopher Reiter to remove his animals and vacate his property.

CAUSE OF ACTION

Mr. Christopher Reiter and Ms. Tiffany Napier re-assert, re-allege, and incorporate by reference the statements contained in paragraphs 1-105 this complaint, as if those statements were fully articulated within the cause of action.

122. Pursuant to 42 U.S.C. 1983, persons deprived of Federal Constitutional Rights may bring a private action for damages against individual officers and units of local government.

123. In order to prove a claim under 42 U.S.C. 1983, a plaintiff must demonstrate that (1) the defendant(s) deprived him/her of a right secured by the Constitution or any law of The United States, and (2) the deprivation of that right resulted from the defendant(s) acting under color of law.

124. All individual defendants to the claim, at all times relevant, hereto, were acting under of color of state law, and their acts and/or omissions were conducted within the scope of their

official duties or employment.

125. At all times relevant, Mr. Christopher Reiter and Ms. Tiffany Napier, had clearly established Constitutional Rights under the First, Fourth, Fifth, Eighth, and Fourteenth Amendments to be secure in their person from unreasonable seizure through excessive and cruel and unusual punishment and had the Constitutional Right under the First Amendment to continue to a video record of the incident that occurred on 09/30/2020 at their residence and a Fifth amendment right to be secure in their property

126. Any reasonable law enforcement officer knew or should have know of these rights at the time of the complained of conduct as they were clearly established at that time.

Relief

WHEREFORE, Plaintiffs, Christopher Reiter and Tiffany Napier, prays this Court grant relief against the named Defendants under their claims as asserted above in the following manner including but not limited to:

- a. An award of full, fair and adequate compensation for all injuries, damages, and losses sustained and for costs herein laid out and expended;
- b. An award of punitive damages in an amount sufficient to deter Defendants from the conduct complained of herein;
- c. Declaratory relief as sought herein;
- d. An award of reasonable attorney's fees incurred as a result of this litigation;
- e. Pre and Post Judgment interest, and
- f. For all other necessary and proper relief in the premises.

He

INJURIES

Tiffany Napier

Physical Injuries

Fractured T12 Vertabrae

Torn Rotator Cuff

Nerve Damage

Inflammation Due to Trauma

All physical injuries are still ongoing

Pain and Suffering

Physical Therapy

Injections

Pain Management

Chiropractor

MRI

CT Scans

X-Rays

And any/or all medical related expenses

Tuition for Cosmetology School

Late Fees During Cosmetology School Due to Absences

Inability To Use Cosmetology License Due to Injuries

Missed Work Due to Injuries/Recovery/Appointments

Traveling expenses for doctor visits/specialists visits/therapy

mental anguish

emotional distress

PTSD

defamation

reputation

mother-child bond with my children

attorney for custody of my children

Christopher Reiter

Property at Cortner rd Marysville In (including building materials tools and furniture)

2006 Harley Davidson

home repairs

2010 Arising sun trailer

Utility Trailer

14 totes of home decorations

Photos and memorabilia

Funeral related costs

Travel expenses

Missed work

Travel expenses

Moving costs

Other damages

Reputation

Business reputation

Lost work – Defamation

Missed work

Pain and suffering

Mental Anguish

JS 44 (Rev. 10/20)

CIVIL COVER SHEET

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I. (a) PLAINTIFFS

Reiter, Christopher L. & Napier, Tiffany R.

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

SEP 30 2022
U.S. DISTRICT COURT
NEW ALBANY, INDIANA

DEFENDANTS

See Attachment

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

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

Attorneys (If Known)

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

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

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

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

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

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
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VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. 1983

Brief description of cause:

Use of Excessive Force and Criminal Conspiracy and Deprivation of Rights and Obstruction of Justice

VII. REQUESTED IN COMPLAINT:☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.**DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

09/30/2022

SIGNATURE OF ATTORNEY OF RECORD

Tiffany Napier pro se

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

JS 44 (Rev. 10/20)

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(c) Attorneys (Firm Name, Address, and Telephone Number)

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County of Residence of First Listed Defendant Clark, IN
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DOCKET NUMBER

DATE

09/30/2022

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Cover Sheet Attachment

Defendants

Clark County Prosecutor's Office
Donnie Boyer
Criminal Investigator

Clark County Sheriff's Department
James Haehl
Major

Clark County Prosecutor's Office
Jeremy Mull
Prosecutor

Clark County Sheriff's Department
August Vissing
Road Officer

Clark County Sheriff's Department
Randy Burton
Road Officer

Clark County Sheriff's Department
Jerold Tenney
Major

Clark County Sheriff's Department
Mark Collett
Sr. Road Officer

Cover Sheet Attachment

Clark County Prosecutor's Office

Laura Basham

Criminal Investigator

Floyd County Sheriff's Department

Troy McDaniel's

Southeast Indiana Regional SWAT Team Commander

Harrison County Sheriff's Department

Nathan Banet

Southeast Indiana Regional SWAT Team Lead

Harrison County Sheriff's Department

Sean O'Sullivan

Southeast Indiana Regional SWAT Team Operator

Harrison County Sheriff's Department

Ryan Hutchinson

Southeast Indiana Regional SWAT Team Operator

Clarksville Police Department

Zachary Skaggs

Southeast Indiana Regional SWAT Team Operator

Floyd County Sheriff's Department

Ken Haas

Southeast Indiana Regional SWAT Team Lead

Cover Sheet Attachment

Floyd County Sheriff's Department

Brad Scott

Southeast Indiana Regional SWAT Team Observer

Clarksville Police Department

Ryan Roederer

Southeast Indiana Regional SWAT Team Operator

Harrison County Sheriff's Department

Ryan Yeager

Southeast Indiana Regional SWAT Team Operator

Clark County Sheriff's Department

Scott Maples

Chief Deputy

Clark County Sheriff's Department

Jamey Noel

Chief

Clark County Sheriff's Department

Donovan Harrod

Captain of Narcotics Division

Clark County Sheriff's Department

Bradley Kramer

Sr. Road Officer

Cover Sheet Attachment

Clark County Sheriff's Department

Harrison County Sheriff's Department

Floyd County Sheriff's Department

Clarksville Police Department

Southeast Indiana Regional SWAT Division