

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

CHRISTAL CRAWFORD, CHARITY )  
CRAWFORD, and CHRISTOPHER )  
CRAWFORD, *ex rel* ZACCHAEUS )  
CRAWFORD and LAVONIA )  
CRAWFORD, )

PLAINTIFFS, )

VS. )

CASE NO. \_\_\_\_\_

CHRYSTAL TEMPLETON, CLYDE )  
ADKISON, STEVE TEETERS, )  
GREG WALKER, SCOTT NEWBERG, )  
CITY OF MURFREESBORO, )  
TENNESSEE, and RUTHERFORD, )  
COUNTY, TENNESSEE, )

DEFENDANTS. )

CAUSES OF ACTION:  
Civil Rights Violations

JURY DEMAND

**PLAINTIFFS' COMPLAINT**

Plaintiffs, Christal Crawford, Charity Crawford, and Christopher Crawford, by and through their parents, Zacchaeus Crawford and Lavonia Crawford, bring this complaint against the above named defendants in a suit for damages pursuant to 42 U.S.C. §1983.

**PARTIES**

1. Plaintiffs, Christal Crawford, Charity Crawford, and Christopher Crawford, (hereinafter plaintiffs) are children under the age of 18 years. Zacchaeus Crawford and Lavonia Crawford are the parents of all plaintiffs. All are residents of Rutherford County, Tennessee, and at all times relevant to the issues in this cause were residents of Rutherford County, Tennessee.

2. Defendant, Chrystal Templeton, "Templeton", was at all times relevant to the issues in this cause an officer of the Murfreesboro City Police Department and acted both officially within the scope of her employment and individually outside the confines of

that employment. Defendant, Chrystal Templeton is a resident of Rutherford County, Tennessee. Defendant, Chrystal Templeton, is being sued both in her individual and official capacities.

3. Defendant, Clyde Adkison, “Adkison”, was at all times relevant to the issues in this cause an officer of the Murfreesboro City Police Department and acted officially within the scope of his employment. Defendant, Clyde Adkison, is a resident of Rutherford County, Tennessee. Defendant, Clyde Adkison, is being sued in his official capacity.

4. Defendant, Steve Teeters, “Teeters”, was at all times relevant to the issues in this cause an officer of the Murfreesboro City Police Department and acted officially within the scope of his employment. Defendant, Steve Teeters, is a resident of Rutherford County, Tennessee. Defendant, Steve Teeters, is being sued in his official capacity.

5. Defendant, Greg Walker, “Walker”, was at all times relevant to the issues in this cause an officer of the Murfreesboro City Police Department and acted officially within the scope of his employment. Defendant, Greg Walker, is a resident of Rutherford County, Tennessee. Defendant, Greg Walker, is being sued in his official capacity.

6. Defendant, Scott Newberg, “Newberg”, was at all times relevant to the issues in this cause an officer of the Murfreesboro City Police Department and acted officially within the scope of his employment. Defendant, Scott Newberg, is a resident of Rutherford County, Tennessee. Defendant, Scott Newberg, is being sued in his official capacity.

7. Defendant, City of Murfreesboro, Tennessee, “Murfreesboro”, is a governmental entity located in Rutherford County, Tennessee, and at all times relevant to

the Complaint was responsible for establishing the policies and procedures of the Murfreesboro Police Department as well as training of employees, including Defendants Templeton, Adkison, Teeters, Walker, and Newberg.

8. Defendant, Rutherford County, Tennessee, "Rutherford County", is a governmental entity located in the state of Tennessee, and at all times relevant to the Complaint was responsible for establishing the policies and procedures for handling juvenile criminal cases within Rutherford County, Tennessee.

### JURISDICTION AND VENUE

9. This lawsuit arises out of the mistreatment suffered by the plaintiffs at the hands of the defendants in Rutherford County, Tennessee.

10. This action arises under the United States Constitution and under the laws of the United States of America, particularly under the provisions of the Fourth and Fourteenth Amendments of the United States Constitution, and particularly under the Civil Rights Act, codified at 42 U.S.C. §1983 *et. seq.*

11. The court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331, § 1343.

12. Venue lies in this district pursuant to 28 U.S.C. § 1391 (b)(2) because the events giving rise to plaintiffs' claims occurred in this district.

### FACTUAL ALLEGATIONS

13. On or about March 20, 2016, a cell phone video was taken of a fight wherein two small children are punching another larger child. The larger child is apparently unfazed, as he continues walking away, while the smaller children take swings at his back

and person. This fight takes place in the yards of several private residences and a public street.

14. A number of children are within the proximity of the fight and their images and voices are included within the video.

15. The plaintiff, Christal Crawford, while in the vicinity of the incident is not pictured within the video and it is unclear whether her voice can be heard on any portion of the video. However, no statements or comments that could be her voice support a conclusion that she is involved in the fighting incident or doing anything other than trying to discourage the incident.

16. The plaintiff, Charity Crawford, is not pictured in the video and was not at the scene of the incident as she was attending an awards banquet at CC's Pizza on the same date and at the same time as the incident in recognition of her basketball team winning the city league championship.

17. The plaintiff, Christopher Crawford, is not pictured in the video and was not a part of the scene of the incident as he was sick and inside his private residence resting from low blood sugar which occasionally happens due to his diabetic condition.

18. The parents of the children, Zacchaeus Crawford and Lavonia Crawford, are not pictured in the video at any time or in any manner.

19. At no point at any time during the video can any of the plaintiffs be identified within the video or identified as participating in any manner regarding the fight incident. There is no audio upon the videotape which emanates from any of the plaintiffs which suggests or supports a conclusion that any of the Crawford children are or were involved in the fighting incident.

20. At some point unknown to the plaintiffs, the video came to the attention of Murfreesboro City Police Officer Chrystal Templeton.

21. On April 14, 2016, at approximately 1:30 p.m., the principal, vice-principal and guidance counselor of Christal Crawford's school, Hobgood Elementary, meet with Christal and ask her questions about the boy being bullied in the video. Officer Templeton was not present at that meeting. This meeting caused such distress to Christal that she was crying when Lavonia Crawford picked her up at the bus stop after school.

22. On April 14, 2016, between 2:50 and 3:00 p.m., Officer Templeton came to the residence of the Crawford's with another unnamed male officer. Officer Templeton did all of the talking while at the residence. Officer Templeton spoke first with Lavonia Crawford and then Ms. Crawford and the children as a group. Zacchaeus Crawford was not present for this meeting. Officer Templeton began the conversation by stating that she needed help finding someone and she showed the children and mother a screenshot of the victim in the video. She asked "Do you know him? Do you know where he stays? He could have been hurt and we want to make sure he is ok." Lavonia Crawford did not know or recognize the boy and she asked the children and they discussed the boy with Officer Templeton and she recorded the information in her notebook. The two officers were at the residence for approximately seven (7) to ten (10) minutes. At no point did Officer Templeton request any information about anyone else in the video.

23. During Officer Templeton's investigation, she spoke with plaintiff Lavonia Crawford and the three Crawford children and allegedly spoke with other individuals within the neighborhood.

24. The Crawford children helped Officer Templeton identify the victim in the fighting incident but did not identify any other individuals within the video because they were not asked for that information in their meeting with Officer Templeton. It is believed that other individuals in the neighborhood identified other persons present on the video.

The Crawfords were not shown the video by Officer Templeton.

25. Officer Templeton thanked the plaintiffs for their help and cooperation and thereafter terminated their encounter without inquiring as to whether any of the Crawford children were present when the fighting incident occurred.

26. Plaintiffs would allege on information and belief that Officer Templeton without utilizing due diligence as required by her position, and without proper investigation and with a complete lack of professional conduct, deliberately and with reckless disregard of the truth of the factual circumstances pursued the arrests of the plaintiff children under T.C.A. §39-11-402. Officer Templeton took this action even though she failed to seek out any assault charges against the plaintiff children or any other individuals, including other minor children who may have been actively involved in the altercation alleged to have been committed constituting a legal assault.

27. It is alleged that the actions of Officer Templeton as cited within the immediate preceding paragraph constitutes action which is deliberately contrary and in complete derogation of T.C.A. §39-11-402. It is alleged that it is clearly identified that such criminal offense cannot be charged as a separate offense and no children, including the plaintiff children, were ever charged with the underlying offense of assault.

28. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, Officer Templeton informed Hobgood Elementary School Principal, Dr. Tammy Garrett, that she would be arresting a number of the students, but not all of the students, who were seen on the video. She indicated that the arrests would occur on Friday, April 15, 2016, and was to include the plaintiff children even though two of the plaintiffs (Charity Crawford and Christopher Crawford) were not at the scene, and Christal Crawford is not seen on the video and cannot be heard on the video making any comments suggestive of any criminal activity.

29. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, Officer Templeton assured Dr. Garrett that no child would be handcuffed, and that she would be on site to do the arrests, and that the arrests would be handled in a "low-key" manner.

30. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, as word of Officer Templeton's plan disseminated among the faculty of Hobgood Elementary on April 14th, administrators expressed their concerns to members of the Murfreesboro City Police Department.

31. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, Lisa Trail, Director of Communications, contacted Sergeant Scott Newberg with such concerns.

32. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, Dr. Garrett expressed such concerns throughout Thursday April 14th and Friday April 15th to various officers of the Murfreesboro City Police Department. Officer Templeton informed Dr. Garrett that the arrests would proceed and instructed her not to contact the children's parents prior to the arrests.

33. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, Officer Chris Williams arrived at Hobgood Elementary School on Friday, April 15, and shortly thereafter learned of Officer Templeton's plan to arrest the children, including the plaintiffs.

34. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, Chris Williams objected directly to Officer Templeton. He advised against the arrests and threatened not to participate.

35. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, Officer Templeton reported Officer Williams' conduct and alleged insubordination. Officer Williams expressed his concerns through the chain of command. Sergeant Scott Newberg, Uniformed Division Supervisor, ordered Officer Williams to assist with the arrests.

36. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, Officer Williams immediately contacted Police Major Clyde Adkison, head of the Administrative Services division. Again, Officer Williams protested against the arrests. Again, he was ordered to participate in the arrests.

37. On information and belief based upon the report of the Incident Review Committee of the Murfreesboro Police Department, Officer Williams then tried to bargain with Officer Templeton, arguing that the arrests should not happen at the school and asking if he could contact the children's parents to alert them beforehand. Officer Templeton responded negatively and confirmed that the arrests would happen at school, and the children's parents would not be contacted before the arrests.

38. It is alleged, pursuant to the statements of Murfreesboro Police Chief Karl Durr, it is the policy of the department to refrain from handcuffing children under 12 years of age where there are not significant exigent circumstances requiring the need to handcuff. It is alleged and averred that Officer Templeton, without utilizing due diligence and with a complete lack of professional conduct and with reckless disregard of the policy of the department, directed the inappropriate handcuffing of two minor children, including one of the plaintiff children, Christal Crawford.

39. On information and belief it is alleged that the following named defendants, Clyde Adkison, Steve Teeters, Greg Walker and Scott Newberg, acting within the scope of their employment, with the City of Murfreesboro, failed to take certain actions and negligently performed their official duties and responsibilities as follows:



A. Said named defendants purposefully and negligently failed to properly supervise and investigate the actions of their subordinate officers;

B. Said named defendants purposely and negligently failed to properly utilize their authority as directed by the policy of the City of Murfreesboro concerning the proper use of the chain of command within the police department;

C. Said named defendants purposely and negligently failed to adequately perform their duties to solicit the assistance of other officers to ensure a proper investigation was conducted concerning the underlying incident in order to prevent inappropriate arrests of the plaintiffs;

D. Said named defendants purposely and negligently failed to exercise appropriate authority to postpone / stop / withdraw from the inappropriate, illegal, unnecessary and unreasonable arrests of the plaintiffs.

40. On information and belief, based upon the report of the Incident Review Committee of the Murfreesboro Police Department, and despite her assurances to the contrary, Officer Templeton directed the handcuffing arrest, even though she was not present for the arrests. At least two of the children (including plaintiff Christal Crawford) were handcuffed. The arrests were not "low-key."

41. Upon information and belief, at the time of and prior to this incident, defendant City of Murfreesboro had a custom, policy, practice, and / or training which allowed and encouraged its police officers to arrest minor children for any criminal offense, even where the offense did not meet the statutory criteria that allowed for an arrest of a minor.

42. This policy by defendant City of Murfreesboro is in direct violation of Tennessee law, which limits the circumstances under which a minor may be physically arrested on misdemeanor delinquency petitions to situations where (a) the delinquent acts occurred in the presence of the arresting officer, (b) the delinquent acts constitute one of a small set of specified misdemeanors for which custodial arrest is authorized even if the

offense occurred outside the presence of the officer, or (c) the Juvenile Court issues an arrest order based on particularized findings that an arrest is necessary for safety purposes or to prevent the child from absconding. T.C.A. §37-1-113; §40-7-103; Tenn. R. Juv. P., Rule 11 (repealed as of July 1, 2016); Tenn. R. Juv. P., 109 (Effective as of July 1, 2016).

43. If none of the above circumstances apply, children in Tennessee may not be arrested for pending misdemeanor petitions and such petitions can only be served via summons to appear in court. The summons must be served on either the child (if the child is 14 years or older) or the child's parents (if the child is less than 14 years old). T.C.A. §37-1-121 (repealed as of July 1, 2016); T.C.A. §37-1-122 in effect as of July 1, 2016); Tenn. R. Juv. P., Rule 11 (Repealed as of July 1, 2016); Tenn. R. Juv. P., 109 (effective July 1, 2016).

44. None of the Tennessee laws providing for the physical arrest of minors were applicable to the circumstances surrounding the plaintiffs' arrests.

45. Upon information and belief, defendant City of Murfreesboro implemented a policy on or around April, 2013 that states, "Misdemeanor citations may not be issued to juvenile offenders. All juveniles referred to Juvenile Court must be transported to the RCJDC."

46. RCJDC is the acronym used to describe the Rutherford County Juvenile Detention Center.

47. This policy effectively requires Rutherford County Law Enforcement agencies to treat juvenile delinquency petitions as if they were "warrants" and arrest every minor charged by a law enforcement officer under a juvenile delinquency petition.

48. The Rutherford County Juvenile Detention Center participates in implementing this policy by accepting children arrested on misdemeanor delinquency

petitions into its custody and temporarily detaining them while its staff determines whether the child qualifies to be incarcerated pretrial under T.C.A. §37-1-114.

49. While RCJDC staff may ultimately release the arrested child to his or her parents, until that decision is made they detain the child at the RCJDC.

50. Tennessee state law limits the pretrial incarceration of children charged with delinquent or unruly offenses under T.C.A. §37-1-114 and §37-1-116.

51. In Tennessee, a minor child may not be incarcerated in a secure detention facility except in compliance with these statutes.

52. Rutherford County Juvenile Detention Center is a “secure facility” within the meaning of T.C.A. §37-1-114.

53. While the substantive liberty rights conveyed by Tennessee state law are clear, state law fails to dictate clear guidance as to the process that must be applied in executing those laws.

54. Upon information and belief, the Rutherford County Juvenile Detention Center Standard Operating Procedures also require that its employees detain children arrested on charges filed by a law enforcement officer until a staff member determines that the child is not a “true threat” to themselves or the community.

55. The standard operating procedures of the Rutherford County Juvenile Detention Center unconstitutionally expand the circumstances under which a minor may be detained beyond what is provided for by statute pursuant to T.C.A. §37-1-114.

56. This custom, policy, practice and / or training is in direct violation of Tennessee state law.

57. Defendant City of Murfreesboro and defendant Rutherford County were aware that their policies of arresting minors for misdemeanor offenses violated state law.

58. Despite being aware that the policy was in violation of the law, the defendants Murfreesboro and Rutherford County continued to follow the policy and provide training on the policy to the officers of the MPD and Rutherford County Juvenile Detention Center.

59. Upon information and belief, at the time of and prior to this incident, defendant City of Murfreesboro had a custom, policy, practice, and / or training which allowed and encouraged its police officers to handcuff minor children even where there was no risk of flight or threat of safety to the arresting officer.

60. Upon information and belief, at the time of and prior to this incident, defendant City of Murfreesboro had a custom, policy, practice, and / or training which allowed and encouraged its police officers to arrest minor children for criminal responsibility for the conduct of another without probable cause.

61. Upon information and belief, at the time of and prior to this incident, defendant City of Murfreesboro had a training program which did not adequately train its officers concerning when an arrest could be made and what facts were sufficient to form a basis for probable cause related to criminal responsibility for the conduct of another.

62. Upon information and belief, at the time of and prior to this incident, defendant City of Murfreesboro had a training program which did not adequately train its officers concerning when it was appropriate to handcuff a minor child.

63. Upon information and belief, at the time of and prior to this incident, defendant City of Murfreesboro had a training program which did not adequately train its

officers concerning the circumstances under which a minor may be detained and questioned or the manner in which the questioning should occur.

64. Defendant City of Murfreesboro was responsible for properly training its officers in making reasonable arrests, the use of handcuffs, the manner and method of detaining and questioning minor children and the verification of the identity of persons to be arrested.

65. Defendant City of Murfreesboro was responsible for providing appropriate and ongoing in-service training to its officers in making reasonable arrests, the use of handcuffs, the manner and method of detaining and questioning minor children.

66. Upon information and belief, defendant City of Murfreesboro failed to provide its officers with appropriate ongoing in-service training in making reasonable arrests, the use of handcuffs, and the manner and method of detaining and questioning minor children.

67. Plaintiff, Christal Crawford, who is not seen within the video and cannot be heard upon the video making any type of statements that could be interpreted as criminal in nature, was handcuffed at approximately 2:15 p.m. on Friday afternoon while in the school and among and in the presence of other students and administrators. She was placed within a patrol car and driven to a local retail parking lot where she was transferred to another patrol car and taken for processing at the Rutherford County Juvenile Detention Center.

68. Plaintiff, Charity Crawford, who was away from the scene at CC's Pizza for a basketball championship banquet at the time of the fighting incident and who was not seen or heard within the video, was to be handcuffed in the presence of other students and administrators and delivered with Christal Crawford to the Rutherford County Juvenile Detention Center. Only at the urging of Principal Garrett was she allowed to

remain at the school initially to undergo treatment for her diabetic condition. While still at the school, Principal Garrett contacted Lavonia Crawford and Lavonia Crawford contacted Zacchaeus Crawford. Mr. Crawford spoke with the arresting officers and offered to take Charity to the Juvenile Detention Center but the officers would not allow him to take said action. When her treatment was concluded, Charity was escorted out of Hobgood Elementary and she was led to a patrol car, without hand cuffs, and taken for processing at the Rutherford County Juvenile Detention Center.

69. Plaintiff, Christopher Crawford, who was not seen or heard in the video and who was inside his residential home being treated for his diabetic condition on the date of the incident was not arrested at school as he was not attending school that day due to his medical condition.

70. Lavonia Crawford, the mother of the plaintiffs, was called by Officer Templeton and told to bring Charity Crawford and Christopher Crawford to the Juvenile Detention Center for processing of their arrests. At the time this call was made, Officer Templeton was not aware that Charity Crawford was already being transported to the Detention Center pursuant to her previous instructions to the arresting officers.

### DAMAGES

71. Each of the plaintiffs suffered great humiliation and embarrassment as a result of the arrests. Christal Crawford has suffered greatly from being handcuffed at her elementary school, led through the school by police, placed in a patrol car, and ultimately booked by officials of the Juvenile Detention Center without any probable cause for her arrest. Charity Crawford has suffered greatly from being led from her elementary school by police, placed in a patrol car and ultimately booked by officials of the Juvenile Detention Center without any probable cause for her arrest, when in fact, she was not even present when the alleged incident took place and Officer Templeton knew or should have known that there was no evidence of her being present at the scene of the incident.

Christopher Crawford has suffered greatly from his arrest and booking at the Juvenile Detention Center. As with the other two children, there was no probable cause for his arrest in the first place.

72. Each of the plaintiff children have expressed continuing embarrassment and anguish resulting from such arrest and further express continuing fear and anxiety associated with law enforcement personnel.

73. The charges against all three plaintiff children were dismissed by the Juvenile Court Judge Donna Scott Davenport of Rutherford County, Tennessee, on the 17th day of June, 2016.

74. Officer Templeton was present along with the Assistant District Attorney for the dismissal of such charges and agreed and recommended such dismissals to the court pursuant to court record.

75. All plaintiff children suffered great mental anguish and emotional trauma as a result of the false arrest and malicious prosecution as instigated and directed by defendants.

#### CLAIMS FOR RELIEF

##### COUNT I:

##### FALSE ARREST IN

##### VIOLATION OF THE FOURTH AMENDMENT

(42 U.S.C. §1983)

and TENNESSEE STATUTORY LAW

and THE TENNESSEE RULES OF JUVENILE COURT

76. Plaintiffs hereby re-allege and incorporate all allegations as contained in Paragraphs 1-70 above.

77. Based upon defendant Templeton's investigation, her review of the video, and her opportunity to gather information on August 14, 2016 when she met with Lavonia Crawford and all three children, defendant Templeton, and the other named defendants, knew or should have known that there existed no probable cause to arrest any of the plaintiff children. It is well established that an individual's mere presence at a crime scene does not constitute probable cause for an arrest and it will be shown that based upon the information possessed by defendants prior to the arrests, two of the plaintiff children were not even at the incident in question.

78. Defendants knew or should have known that neither Charity Crawford nor Christopher Crawford were identified upon the video or were at the incident scene and that in fact Charity Crawford was at a basketball championship banquet. Further, defendants knew or should have known that while Christal Crawford was at the scene, she was not seen within the video and not heard on the video making any statements that can be interpreted as being criminal in nature.

79. Despite a complete absence of evidence to support the criminal allegations and in spite of conclusive and overwhelming evidence known to defendants that plaintiffs did not participate in any alleged assault, Officer Templeton swore out a warrant under oath wherein she alleged that the plaintiff children encouraged and caused an assault involving other individuals.

80. Officer Templeton instigated and directed the arrests of the plaintiff children on April 15, 2016 and as a result of the specific direction of Officer Templeton, along with the actions and failures of the remaining defendants, the plaintiff Christal Crawford was arrested and handcuffed within her school in the presence of other children and administrators and placed in the back of a police car and eventually taken to the



Rutherford County Juvenile Detention Center. In addition, as a result of defendants' actions or omissions, plaintiff Charity Crawford was arrested within her school in the presence of other children and administrators and placed in the back of a police car and eventually taken to the Rutherford County Juvenile Detention Center. Further, as a result of defendants' actions and omissions, plaintiff Christopher Crawford was taken to the Juvenile Detention Center by his parents and was arrested for a crime he did not commit.

81. As a direct and proximate result of the defendants' actions, the plaintiffs have suffered severe shock, embarrassment, humiliation, and mental anguish both at the time of their arrest and since that time have continued to suffer from embarrassment, depression, and a very heightened sense of anxiety. The story continues to reverberate throughout the community and the continued references to the Crawford family and the continued focus from the community causes continued embarrassment and anxiety for the children.

COUNT II:  
MALICIOUS PROSECUTION IN  
VIOLATION OF THE FOURTH AMENDMENT  
(42 U.S.C. §1983)

82. Plaintiffs hereby re-allege and incorporate all allegations as contained in Paragraphs 1-70 above.

83. Defendants made the decision and determination to prosecute the "criminal responsibility" petition against Christal Crawford. Defendant Templeton, as supervised by the other defendants, swore out the petition alleging that Christal Crawford "encouraged and caused" an assault with no evidence to support such sworn allegation and in spite of very clear evidence that Christal Crawford never appeared in the video evidencing a fight between two other juveniles and is never heard upon such video making

any verbal statements that could be interpreted as evidence of “criminal responsibility” for the fight.

84. Defendants made the decision and determination to prosecute the "criminal responsibility" petition against Charity Crawford. Defendant Templeton, as supervised by the other defendants, swore out the petition alleging that Charity Crawford "encouraged and caused" an assault with no evidence to support such sworn allegation and in spite of the knowledge that Charity Crawford never appeared in the video evidencing a fight between two other juveniles and in fact was not at the scene as she was attending a basketball championship banquet at the time of the incident.

85. Defendants made the decision and determination to prosecute the "criminal responsibility" petition against Christopher Crawford. Defendant Templeton, as supervised by the other defendants, swore out the petition alleging that Christopher Crawford "encouraged and caused" an assault with no evidence to support such sworn allegation and in spite of the knowledge that Christopher Crawford never appeared in the video evidencing a fight between two juveniles and was resting within his home because of low blood sugar related to his diabetic condition at the time of the incident.

86. Based upon the investigation, especially the video tape recording itself, Officer Templeton, as supervised by the other defendants, knew or should have known that none of the plaintiffs had any criminal responsibility for anything that happened in the video. Further, Officer Templeton knew or should have known that two of the children were not present at the alleged crime scene and that Christal Crawford's mere presence at a scene did not constitute probable cause for an arrest.

87. Plaintiffs therefore allege and assert that there was no probable cause to support the plaintiff children's prosecution and that the actions and conduct of defendants were malicious, deliberate, and were pursued with reckless disregard of the truth of the factual circumstances.

88. Officer Templeton further influenced the prosecution of the criminal charges by collaborating with the other named defendants in order to force the compliance of other officers with their determination to arrest and prosecute the plaintiff children without probable cause.

89. The charges against the plaintiff children resulted in a deprivation of their liberty. Each was taken into custody, held against their will, and processed resulting from their arrest within the Rutherford County Juvenile Detention Center, and further forced to answer and defend the invalid, illegal, erroneous and malicious charges in Juvenile Court.

90. The charges against Christal Crawford resulted in a deprivation of her liberty, in that she was taken into custody, handcuffed, and placed within a patrol car for transport, formally arrested, and further forced to answer and defend the invalid, illegal, erroneous and malicious charges in Juvenile Court. The charges against Charity Crawford resulted in a deprivation of her liberty, in that she was taken into custody, placed in a patrol car for transport, formally arrested, and further forced to answer and defend the invalid, illegal, erroneous and malicious charges in Juvenile Court. The charges against Christopher Crawford resulted in a deprivation of his liberty, in that he was formally arrested and forced to answer and defend the invalid, illegal, erroneous and malicious charges in Juvenile Court.

91. Defendants deliberately and with reckless disregard of the truth acted with malice and extreme indifference to the constitutional rights of the plaintiffs when they brought charges directing the arrest of the plaintiff children knowing no probable cause existed for such arrest. Defendant's malice and reckless disregard of the truth is further demonstrated as they directed others (a) including Officer Chris Williams and Dr. Tammy Garrett not to inform the plaintiffs' parents of the impending arrest; (b) lying to Dr. Garrett as to how the arrests would take place; (c) ignoring the objections of other officers whom defendants required to carry out the arrests at their direction; (d) ignoring the clear

evidence that they were arresting individuals who were not at the scene of the alleged crime; (e) ignoring the clear evidence that they were arresting a juvenile with no evidence of any participation or involvement in any crime; (f) swore out arrest warrants for a crime which cannot legally be sought as a stand alone offense; (g) directed the utilization of handcuffing of minor children.

92. The charges against all of the plaintiff children were dismissed and resolved in the favor of the plaintiff children on the 17th day of June, 2016 at the direction and agreement of the Assistant District Attorney and approval of Murfreesboro Police Department.

COUNT III:  
MUNICIPAL LIABILITY  
CITY OF MURFREESBORO, TENNESSEE

93. The conduct of defendant City of Murfreesboro described above deprived the plaintiffs of their rights to be free from unreasonable seizures as guaranteed under the Fourth Amendment to the United States Constitution.

94. Defendant City of Murfreesboro contemporaneously approved and ratified the conduct and actions of the other defendants resulting in the false arrest, illegal detention and malicious prosecution of the Plaintiffs.

95. Defendant City of Murfreesboro's policies, procedures and training regarding the arrest of minors on misdemeanor charges occurring outside the presence of an officer were also the motivating force behind the arrests and prosecutions of plaintiffs.

96. Pursuant to statute, defendant City of Murfreesboro is liable to the Plaintiffs for special and general compensatory damages, including but not limited to,

emotional, physical, economic, and pecuniary damages, and reasonable attorney's fees and costs.

97. Also, pursuant to statute, Plaintiffs are entitled to injunctive relief to enjoin defendant City of Murfreesboro from engaging in future conduct which violates state law and deprives individuals of their constitutional rights as well as reasonable attorney's fees and costs for the necessity of requesting such relief.

98. Specifically, plaintiffs request that this Honorable Court enjoin the City of Murfreesboro from enforcing any custom, practice, policy and / or training that requires juveniles charged with misdemeanors be arrested or illegally detained outside the confines of Tennessee law and that they be awarded their attorney fees and other costs and expenses associated with this litigation for the necessity of bringing this action.

COUNT IV:  
MUNICIPAL LIABILITY  
RUTHERFORD COUNTY, TENNESSEE

99. Defendant Rutherford County's custom, practice, policies and procedures regarding the arrest of minors on misdemeanor citations were a motivating force behind the arrests of plaintiffs.

100. Pursuant to statute, defendant Rutherford County is liable to the plaintiffs for special and general compensatory damages, including but not limited to, emotional, physical, economic, and pecuniary damages, and reasonable attorney's fees and costs.

101. Also pursuant to statute, plaintiffs are entitled to injunctive relief to enjoin defendant Rutherford County from engaging in future conduct which violates state

law and deprives individuals of their constitutional rights as well as reasonable attorney's fees and costs for the necessity of requesting such relief.

102. Specifically, plaintiffs request that this Honorable Court enjoin defendant Rutherford County from enforcing any custom, practice, policy and / or procedure that requires juveniles charged with misdemeanors be arrested or illegally detained outside the confines of Tennessee law and that they be awarded their attorney fees and other costs and expenses associated with this litigation for the necessity of bringing this action.

103. Rule 20 (a) (1) of the Federal Rules of Civil Procedure states "persons may join in one action as plaintiffs if: (A) they assert any right to relief jointly, severally, or in the alternative in respect of or arising out of the same transaction, occurrence, or series of transactions or occurrences; and (B) any question of law or fact common to all plaintiffs will arise in the action." Fed. R. C. P. Rule 20 (a) (1). Based upon all three children, Christal Crawford, Charity Crawford, and Christopher Crawford, being injured as a result of the foregoing mutual factual allegations contained in this complaint caused by the same defendants and having the same causes of action, arising out of the transaction and occurrences stated in this complaint, plaintiffs hereby ask this court to join their respective suits. Each individual plaintiff will seek his or her own respective judgment against the defendants at trial.

PREMISES CONSIDERED, THE PLAINTIFFS PRAY FOR THE FOLLOWING RELIEF AGAINST DEFENDANTS:

A. That this complaint be filed and summons issue to the defendants, requiring said defendants to answer this complaint within the time prescribed by law.

B. That upon a hearing in this cause the plaintiffs be awarded all damages to which it may appear they are entitled by the proof submitted in this cause, including nominal damages, compensatory damages, punitive damages and attorneys' fees.

C. That upon a hearing in this cause the plaintiffs be awarded all damages associated with the necessity of requesting and implementation of injunctive relief against both the City of Murfreesboro, Tennessee and Rutherford County, Tennessee, including attorneys' fees.

D. That plaintiffs be awarded attorney's fees pursuant to 42 U.S.C § 1988, plus compensation for any expert fees and other costs reasonably expended in pursuing this matter.

E. That plaintiffs be awarded pre- and post- judgment interest.

F. That this cause be tried by a jury.

G. That plaintiffs be awarded all other general relief to which they may appear entitled, the interests of justice demanding it.

Respectfully Submitted,

s/ Gary D. Beasley  
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