

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION**

NORA JEAN STYLES, as Administrator \*  
for and on Behalf of The Estate of, \*  
STEPHEN STYLES, JR., \*

Plaintiff, \*

vs. \* CIVIL ACTION

BROOKS COUNTY, GEORGIA, \*  
SHERIFF MIKE DEWEY in His Individual and \*  
Official Capacity; DWAYNE SCOTT \*  
BOUTWELL, in His Individual and Official \*  
Capacity; COURTNEY GIDDENS, in His \*  
Individual and Official Capacity; and JIM PYLE, \*  
in His Individual and Official Capacity, \*

Defendants. \*

FILE NO.: \_\_\_\_\_

**JURY TRIAL DEMANDED**

**COMPLAINT**

Plaintiff NORA JEAN STYLES, as Administrator for and on Behalf of The ESTATE OF STEPHEN STYLES, JR., hereby sues each the Defendants named above and states:

**PRELIMINARY STATEMENT**

1. This action is for and on Behalf of The Estate of STEPHEN STYLES, JR. ("Plaintiff"), on whose behalf, Plaintiff NORA JEAN STYLES, as its Administrator hereby sues the Defendant BROOKS COUNTY, GEORGIA, MIKE DEWEY, DWAYNE SCOTT BOUTWELL, COURTNEY GIDDENS, and JIM

PYLE pursuant to 42 U.S.C. § 1983, the laws of the State of Georgia governing tort claims of assault, battery, conspiracy, excessive use of force, violations of plaintiff's constitutional rights under the Fifth and Fourteenth Amendments to the United States Constitution, and its concomitant provisions found within the Constitution of the State of Georgia, all of which was grew out of certain misconduct and inactions by the defendants while plaintiff was a detainee at the Brooks County Jail on or about September 8, 2016. The actions and misconduct of the defendant officers were negatively influenced by defendants' racial attitudes towards non-whites and are the diect result of a policy, practice, custom, and deliberate indifference on the part of Defendant BROOKS COUNTY, GEORGIA, its Sheriff, Defendant MIKE DEWEY, and its jail administrator, Defendant SCOTT BOUTWELL.

### **. JURISDICTION AND VENUE**

2. Subject matter jurisdiction is properly invoked pursuant to this Court's jurisdiction 42 U.S.C. § 1983 and 28 U.S.C. §§ 1331,1343(a)(3), 1343(a)(4), and 1367(a).

3. Venue is properly invoked insofar as the unlawful conduct alleged herein occurred in Brooks County, Georgia.

**PARTIES**

4. At all times material to this Complaint, Plaintiff STEPHEN STYLES, JR. was a thirty-nine (39) year old African-American male who was awaiting trial and being detained in the Brooks County Jail located in Quitman, Georgia.

5. At all times material to this Complaint, Defendant BROOKS COUNTY, GEORGIA (“Defendant COUNTY”) is a political subdivision of the State of Georgia organized and existing under the laws of the State of Georgia and charged with the duty of facilitating law enforcement within Brooks County, Georgia. Said defendant owns operates, manages, directs, and controls the Brooks County Jail, which employs Defendants DWAYNE SCOTT BOUTWELL, COURTNEY GIDDENS, and JIM PYLE.

6. Defendant MIKE DEWEY (“Defendant SHERIFF”) is and was at all times relevant to this Complaint, the Sheriff of Brooks County and the county official who controls and dictates the rules, policies and procedures of the Brooks County Jail. He is sued in his official and individual capacity. Defendant MIKE DEWEY is Caucasian.

7. Defendant DWAYNE SCOTT BOUTWELL (“Defendant BOUTWELL”) was at all times relevant to this Complaint a captain within the Brooks County Sheriff’s Department and the Jail Administrator at the Brooks County Jail. He is

sued in his official and individual capacity. Defendant SCOTT BOUTWELL is Caucasian.

8. Defendant COURTNEY GIDDENS ("Defendant GIDDENS"), was at all times relevant to this Complaint a lieutenant at the Brooks County Jail. He is sued in his official and individual capacity. Defendant COURTNEY GIDDENS is Caucasian.

9. Defendant JIM PYLE ("Defendant PYLE"), was at all times relevant to this Complaint a detention officer at the Brooks County Jail. He is sued in his official and individual capacity. Defendant JIM PYLE is Caucasian.

10. At all times relevant to this Complaint, all defendants acted in concert and conspiracy and were jointly and severally responsible for the harms caused to Plaintiff STEPHEN STYLES, JR..

11. At all times material to this Complaint, Defendants MIKE DEWEY, SCOTT BOUTWELL, COURTNEY GIDDENS, and JIM PYLE were acting under color of State statutes, ordinances, regulations, customs and usages of the State of Georgia and in their actions and appearances pursuant to their authority.

### **FACTS COMMON TO ALL COUNTS**

12. On September 6, 2016, at approximately 9:30 a.m., Plaintiff STYLES was laying on his bunk when Defendant BOUTWELL slapped his feet and said

“get your ass up, we don’t lay down around here”.

13. Plaintiff STYLES responded that he had been to the doctor and that he had been given “an excuse” and therefore permission to be in his bunk.

14. Defendant BOUTWELL then ordered Defendant GIDDENS to “get him [Plaintiff] out of here.” Defendant GIDDENS was in the cell when this occurred.

15. Defendant BOUTWELL then left Plaintiff STYLES’ cell and Defendant GIDDENS helped get Plaintiff STYLES’ belongings together to take to the new cell.

16. While Defendant GIDDENS was helping Plaintiff STYLES, Defendant GIDDENS called for Defendant PYLE’s assistance.

17. As Defendants GIDDENS and PYLE entered Plaintiff STYLES’ cell, Defendant GIDDENS stated to Defendant PYLE that Plaintiff STYLES was going to be placed in Cell Block C5.

18. However, Defendant PYLE then revealed that Defendant BOUTWELL had ordered that Plaintiff STYLES be placed in Cell Block A, which is a cell block that detainees are placed in as a form of administrative punishment for misbehavior or non-compliance with jail rules or regulations.

19. At all times relevant to this Complaint, Cell Block C was considered to be a cell where detainees have privileges, as opposed to Cell Block A, which is a location in the jail where detainees are “locked down” and have few or no

privileges.

20. Thereafter, Defendant BOUTWELL came into the area where Plaintiff STYLES was located and, as a result, Plaintiff STYLES walked towards Defendant BOUTWELL for purposes of requesting to speak him about the decision to move Plaintiff STYLES to Cell Block A. In response, Defendant BOUTWELL stated that he was not going to consider or re-consider Plaintiff STYLES's request to remain in Cell Block C.

21. Upon witnessing Plaintiff STYLES's disapproval and anger arising from Defendant BOUTWELL's decisions to subject Plaintiff STYLES to a location where detainees are placed as a means of punishing them for misbehavior, Defendant BOUTWELL ordered Defendants GIDDENS and PYLE to handcuff Plaintiff STYLES, which was accomplished without any resistance from Plaintiff STYLES.

22. Upon observing Plaintiff STYLES's aforementioned disapproval, Defendant BOUTWELL began to force Plaintiff STYLES down to the floor by grabbing him around the head and pulling him to the ground when there was no reason or justification for doing so.

23. Once Plaintiff STYLES was on the ground and while tightly handcuffed with his hands behind his back and under the control of Defendants GIDDENS and PYLE, Defendant BOUTWELL began to forcefully press Plaintiff STYLES's

face against the concrete flooring of the jail when to do so was without justification or provocation.

24. After Plaintiff STYLES was placed on the ground and while tightly handcuffed with his hands behind his back and under the control of Defendants GIDDENS and PYLE, Defendant BOUTWELL began to violently strike Plaintiff STYLES with his knees in the area of Plaintiff STYLES's rib cage and kidneys. Defendant BOUTWELL violently kneed and thus battered Plaintiff STYLES approximately ten (10) times without justification or provocation.

25. After Plaintiff STYLES was placed on the ground and while tightly handcuffed with his hands behind his back and under the control of Defendants GIDDENS and PYLE, neither Defendants GIDDENS and PYLE attempted to prevent or interfere with Defendant BOUTWELL's needless and brutal assault upon Plaintiff STYLES at a time and under circumstances when Plaintiff STYLES was completely defenseless.

24. After Plaintiff STYLES was lifted to his feet, he was taken to and confined in a lock down cell where Plaintiff STYLES remained tightly handcuffed from behind his back for several hours without justification or provocation.

25. Once Plaintiff STYLES was taken to the aforementioned lock down cell, Plaintiff STYLES was not issued a mattress nor a blanket, and thereafter, was forced to endure these needless inhumane conditions and treatment for a number

of hours without justification or any other reason other than to retaliate and cause Plaintiff STYLES to suffer great pain.

26. As a direct and proximal result of having handcuffs tightly placed upon Plaintiff STYLES's wrists, his hands became painfully numb due to the extreme tightness with which the handcuffs were applied by Defendants GIDDENS and PYLE, a custom and practice which was routinely employed by the staff of the Brooks County Jail for the express purpose of inflicting insufferable pain upon detainees.

27. Although Defendants GIDDENS and PYLE were following the instructions, orders, and dictates of Defendant BOUTWELL, Defendants GIDDENS and PYLE were under a duty to protect Plaintiff STYLES from becoming the victim of needless inhumane conditions and treatment, as well as, the previously mentioned excessive use of force.

28. Although Defendants GIDDENS and PYLE were following the policies, orders, and dictates of Defendant BOUTWELL, SHERIFF, and BOUTWELL the aforesaid defendants conspired to cover-up the aforementioned events and circumstances surrounding the mistreatment of Plaintiff STYLES, as well as, violations of his constitutional rights.

28. The aforementioned mistreatment of Plaintiff STYLES by Defendants BOUTWELL, GIDDENS and PYLE was the direct and proximate result of racial



bias, above and beyond the policies, training, and express instructions of Defendants SHERIFF and BOUTWELL, or the lack thereof.

29. At no time did Plaintiff STYLES commit any offense in violation, of the laws of the City of Quitman, or the State of Georgia, or the United States.

30. There was no legal cause to justify the use of force against Plaintiff STYLES, and the force used against said plaintiff was both unreasonable and excessive.

31. At all times relevant to this Complaint, the conduct of each of the defendants was in willful, reckless, and callous disregard of Plaintiff STYLES's rights under federal and state law.

32. As a direct and proximate result of the conduct of all defendants, plaintiff suffered and continues to suffer physical and psychological harm, pain and suffering, some or all of which may have been permanent, and caused financial losses.

## **CAUSES OF ACTION**

### **COUNT I**

#### **Plaintiff v. Defendants Boutwell, Giddens and Pyle Federal Constitutional Claims**

33. The actions of Defendants BOUTWELL, GIDDENS and PYLE violated Plaintiff STYLES's rights under the Fourth and Fourteenth Amendments

of the United States Constitution to be free from unlawful use of force and racial discrimination.

**COUNT II**  
**Plaintiff v. Defendants**  
**Federal Constitutional Claims**

34. The violations of plaintiffs constitutional rights under the Fourth and Fourteenth Amendments to the United States Constitution, Plaintiff STYLES's damages, and the conduct of the individual defendants were directly and proximately caused by the actions and/or inactions of Defendants SHERIFF and BROOKS COUNTY, which has encouraged, tolerated, ratified, and has been deliberately indifferent to the following policies, patterns, practices, and customs, and to the need for more or different training, supervision, investigation, or discipline in the areas of:

- a. The use of force by police officers;
- b. The proper exercise of police powers, including but not limited to the use of force,
- c. The monitoring of jail officials and staff members whom it knew or should have known were suffering from emotional and/or psychological problems that impaired their ability to function as officers;
- d. The monitoring of jail officials and staff members whom it knew or should have known possessed racial attitudes that impaired their ability to properly

function as officers;

e. The failure to identify and take remedial or disciplinary action against jail officials who were the subject of prior internal complaints of misconduct;

f. Jail officials' use of their status as detention officers to employ the use of force or to achieve ends not reasonably related to their duties;

g. The failure of jail officials to follow established policies, procedures, directives, and instructions regarding the use of force, and the institution of disciplinary measures under such circumstances as presented by this case;

h. The failure to properly sanction or discipline jail officers who are aware of and conceal and/or aid and abet violations of constitutional rights of other individuals by Brooks County jail officials and detention officers;

i. The practice among Brooks County jail officials of instituting or threatening to institute false charges against individuals who have been subjected to unlawful force, all of which is done with the intention of precluding or persuading such individuals from instituting civil claims; and

j. The hiring and retention of jail officials and detention officers who are unqualified for their employment due to incompetence and a proclivity to treat detainees of color with disdain and race hatred.

**COUNT III**  
**Plaintiff v. Defendants**  
**Federal Constitutional Claims-Violation of Eighth**  
**Amendment**

35. Defendants BOUTWELL, GIDDENS and PYLE, with deliberate indifference, failed to take actions to protect Plaintiff STYLES despite their knowledge of a substantial risk of harm to Plaintiff.

36. The actions of Defendants BOUTWELL, GIDDENS and PYLE thereby violated Plaintiff STYLES's right to be free from cruel and unusual punishment under the Eighth Amendment to the United States Constitution.

**COUNT IV**  
**Plaintiff v. Defendants Boutwell, Giddens and Pyle**  
**State Claims**

37. The actions of Defendants BOUTWELL, GIDDENS, PYLE and SHERIFF constitute the torts of assault, battery, conspiracy and violations of Plaintiff STYLES's rights under the laws and Constitution of the State of Georgia.

WHEREFORE, Plaintiff ESTATE OF STEPHEN STYLES, JR.  
respectfully requests:

- A. Compensatory damages as to all defendants;
- B. Punitive damages as to Defendants MIKE DEWEY, DWAYNE SCOTT BOUTWELL, COURTNEY GIDDENS and JIM PYLE ;
- C. Reasonable attorneys' fees pursuant to 42 U.S.C. § 1988, as well as, costs

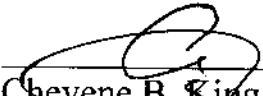
as to all defendants;

D. Such other and further relief as may appear just and appropriate.

PLAINTIFF HEREBY DEMANDS A JURY TRIAL.

THE C.B. KING LAW FIRM

BY:

  
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OF STEPHEN STYLES, JR.

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