

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

JAQHULIA STEVENS

PLAINTIFF

VERSUS

Civil Action No. 2:24-cv-70-TBM-RPM

OFFICER PATRICK DICKERSON  
in his individual and official capacity,  
OFFICER TAMMY MYERS  
in her individual and official capacity,  
OFFICER DEVIN CRAVEN  
in his individual and official capacity,  
OFFICER AMANDA GOULD  
in her individual and official capacity,  
THE CITY OF LAUREL,  
MISSISSIPPI, a municipal corporation,  
CHIEF TOMMY COX  
in his individual and official capacity,  
& DOE OFFICERS 1-10

DEFENDANTS

**COMPLAINT**  
[JURY TRIAL DEMANDED]

INTRODUCTION

This civil rights action seeks monetary damages against Defendants for past violations of the Plaintiffs' rights guaranteed by the United States Constitution and Mississippi law. The Defendants' wrongful conduct began on February 2, 2023 in Laurel, MS. Before his interaction with the Defendants, Jhaqulia had never been convicted of any criminal act. At no time relevant herein was Jhaqulia engaged in any illegal activity. At all times relevant herein, the individual Defendants were acting under color of law.

The constitutional violations resulted from the policies and customs as established and observed by the final policymaker for the Laurel Police Department, Tommy Cox. The systemic abuses by the Laurel Police Department result from a custom and culture that encourages,

sanctions, minimizes, and protects violations of the constitutional rights of regular citizens and an ongoing pattern and practice of failing to train, supervise, and discipline properly.

Therefore, each Defendant is liable for the constitutional violations explained herein and all resulting damages and harms.

**A. THE PARTIES**

1. Plaintiff Jhaqulia Stevens (“Jhaqulia”) is an adult citizen of Jones County, MS.

2. Defendant Officer Patrick Dickerson (“Officer Dickerson”) is and/or was at the time of the incident complained of herein an officer with the Laurel Police Department.

3. Defendant Officer Tammy Myers (“Tammy Myers”) is and/or was at the time of the incident complained of herein an officer with the Laurel Police Department.

4. Defendant Officer Devin Craven (“Officer Craven”) is and/or was at the time of the incident complained of herein an officer with the Laurel Police Department.

5. Defendant Officer Amanda Gould (“Officer Gould”) is and/or was at the time of the incident complained of herein an officer with the Laurel Police Department.

6. Defendant Tommy Cox (“the Chief” or “Chief”) is and/or was at the time of the incident complained of herein the chief of the Laurel Police Department.

7. Defendants named above may be served at their headquarters at 317 Magnolia Street, Laurel, MS 39440.

8. Defendant City of Laurel, Mississippi (“the City” or “City”) is a municipal corporation incorporated under the laws of the State of Mississippi and is the entity that governs and is liable for any malfeasance of the Laurel Police Department. The City of Laurel may be served through its mayor or city clerk at 401 N. 5th Avenue, Laurel, MS 39440.

**B. JURISDICTION & VENUE**

1. This action arises under the United States Constitution and federal law under provisions of the Fourth and Fourteenth Amendments of the United States Constitution and 42 U.S.C. § 1983.

2. This action seeks redress for violations of the civil rights laws of the United States, and jurisdiction is therefore invoked under 28 U.S.C. §§ 1331 and 1343, *inter alia*.

3. The claims made in this Complaint occurred and arose in the State of Mississippi in the city of Laurel and therefore in this District and the Hattiesburg Division. Venue, therefore, lies in this Court under 28 U.S.C. § 1391.

4. Under 28 U.S.C. § 1367, this Court also has pendent jurisdiction to hear state law claims.

### **C. FACTS UNDERLYING THE CLAIMS**

1. On February 2, 2023, Jahqulia was driving on 2nd Avenue in Laurel, MS near the intersection of Teresa Street and 6th Street.

2. As she was driving, Jahqulia noticed that a car that she thought was her brother's car had been pulled over by the police.

3. Jahqulia stopped momentarily in the roadway to see if that was her brother's car.

4. Officer Dickerson instructed Jahqulia to "get on down the road", and she immediately drove away.

5. Nothing Jahqulia did was illegal, and she did nothing that would make any reasonable person upset or feel that she had disrespected or questioned them.

6. Officer Dickerson became angry, jumped in his squad car, and peeled out to chase the vehicle of Jahqulia. Officer Dickerson did this even though he had just told her to go down the

road, and she complied with that request immediately without saying anything even remotely disrespectful or inflammatory to Officer Dickerson.

7. Upon noticing Officer Dickerson pursue her, Jahqulia immediately pulled into a parking lot that was no more than 500 feet away from the spot where her brother had been pulled over.

8. Officer Dickerson sped into the parking lot where Jahqulia was parked, got out of his squad car, and aggressively approached Jahqulia's vehicle.

9. As he approached Jahqulia's vehicle, she had already opened her door and had her wallet in her hand ready to retrieve her license to give to Officer Dickerson.

10. Officer Dickerson did not immediately ask for Jahqulia's license and instead began asking her rhetorical and antagonistic questions.

11. Officer Dickerson accused Jahqulia of interfering with a traffic stop, and she denied such accusations.

12. Officer Dickerson then asked Jahqulia to give him her driver's license, and she immediately gave it to him.

13. Officer Dickerson continued to threaten and antagonize Jahqulia, and because she questioned him, he ordered Jahqulia to get out of her car. She immediately got out of the car.

14. Officer Dickerson again accused Jahqulia of interfering with a traffic stop, and she denied such accusations again.

15. Officer Dickerson became progressively frustrated with Jahqulia simply for questioning him and retaliated against Jahqulia for denying that she had interfered with a traffic stop by placing her under arrest.

16. Officer Dickerson has a history of getting angry at citizens for talking or expressing their First Amendment Rights when they assert that he is wrong about something. Officer Dickerson is frequently wrong about things.

17. At the time of her arrest, Jahqulia had committed no crime. No reasonable person, much less officer, would have believed or suspected that Jahqulia had committed a crime.

18. Jahqulia was arrested, booked into the local jail, and charged by Officer Dickerson and Officer Gould with resisting or obstructing arrest under Miss. Code § 97-9-73 and failure to comply with an officer under Miss. Code § 97-35-7.

19. Jahqulia spent about 4 hours in jail. While she was in jail, she missed out on a business opportunity.

20. Jahqulia never resisted arrest nor did she disobey any orders even though the orders she was given by Officer Dickerson were not lawful.

21. Officer Dickerson provided statements to a supervising officer, who he called 'Stringer', on the phone shortly after arresting Jahqulia seemingly in an attempt to justify his arrest of Jahqulia after he had already made the arrest.

22. The practice of manufacturing post hoc justifications and corroborations for unconstitutional actions is common in the Laurel Police Department. The practice is encouraged by supervisors to create the false appearance of credibility in frivolous arrests.

23. Officer Dickerson and Officer Craven were in direct contact with Jahqulia at the time of and directly after her arrest. In other words, Officer Craven assisted in the unreasonable seizure and arrest of Jahqulia. Other Officers may have assisted as well.

24. Officer Myers was on the scene during and after the time of Jahqulia's arrest. Officer Myers did not intervene to stop Officer Dickerson from violating Jahqulia's rights. It is

unknown the extent to which Officer Myers participated in the arrest and prosecution of Jahqulia at this time.

25. Other Laurel Police Officers who were on the scene during the incident described above did not intervene to stop Officer Dickerson despite witnessing him manufacture a cause of action against Jahqulia in violation of her rights on several counts.

26. Officer Amanda Gould executed a false arrest affidavit accusing Jahqulia of resisting arrest although it is unknown whether she was on the scene during the violations of Jahqulia's rights described above. It is unknown if Officer Gould had observed any of the that led to the arrest of Jahqulia. In other words, it is unclear if Officer Gould knew that the affidavit she swore to was actually false at the time that she signed it. Officer Gould never repudiated her false affidavit regardless of what she became aware of after executing it.

27. On May 15, 2023, Officer Dickerson testified falsely against Jahqulia in Laurel Municipal Court before Judge Kyle Robertson to various facts about the incident. The testimony included, but was not limited to, the following false claims:

- a. Jahqulia jerked her arm away from Officer Dickerson.
- b. Jahqulia refused to drive away from the area where the officers had pulled over her brother.
- c. Jahqulia yelled curse words at the officers.
- d. Jahqulia locked her door to prevent Officer Dickerson from gaining access to her.
- e. Jahqulia refused to provide her identification.
- f. Jahqulia's car door was closed when the officer approached her vehicle.

g. Jahqulia refused repeatedly to get out of her vehicle when commanded to do so.

28. Indisputable body cam footage proves that Officer Dickerson's testimony against Jahqulia was false.

29. Indisputable body cam footage proves that Officer Dickerson and Officer Gould's affidavits of arrest against Jahqulia were false.

30. Indisputable body cam footage proves that Officer Dickerson had no probable cause to arrest Jahqulia.

31. Indisputable body cam footage proves that Officer Dickerson was unnecessarily aggressive and created a public danger without justification by driving his squad car in a reckless fashion.

32. Indisputable body cam footage proves that Jahqulia never yelled at nor cursed at the officers during the incident described above.

33. Indisputable body cam footage proves that Officer Dickerson's actions were unreasonable.

34. The body cam footage of the incident described herein speaks for itself and contains more information than could be fully stated in a complaint.

35. After Jahqulia motioned in the underlying municipal court case against her to have the cause against her dismissed based on the clear evidence and false testimony of Officer Dickerson, Jahqulia was instead found not guilty *sua sponte* on both counts by Judge Kyle Robertson in Laurel Municipal Court.

36. Officer Craven personally participated in the arrest and unlawful treatment of Jahqulia. Officer Craven was also present to testify against Jahqulia, but after Jahqulia was found not guilty, his testimony was not taken.

37. During the course of the arrest of Jahqulia, Officer Craven tried to calm down officer Dickerson, who was visibly angry, but Officer Craven did nothing to stop Officer Dickerson. Instead, he participated in the wrongful conduct on the scene and in the prosecution of Jahqulia.

38. Jahqulia, through her undersigned attorney, submitted evidence of the false testimony and the incident described above to Chief Tommy Cox after being found not guilty on both counts against her.

39. Nearly a year later, no disciplinary action has been taken against Officer Dickerson nor any of the other officers involved by the Laurel Police Department for their illegal, unconstitutional and/or fraudulent actions described above. The Chief is the person responsible for correcting the misconduct of his officers and is the chief decision and policy maker for the Laurel Police Department.

**D. DEPRIVATION OF FEDERAL RIGHTS UNDER 42 U.S.C. § 1983**

1. All of the relevant acts of Defendants, their agents, servants and employees, were carried out under the color of state law and in their official capacity as agents of the Department.

2. These acts deprived Plaintiff of the rights, privileges and immunities guaranteed to citizens of the United States by the Fourth and Fifth Amendments as incorporated against the States by the Fourteenth Amendment to the Constitution and in violation of 42 U.S.C. § 1983.

**FIRST COUNT – Unlawful Seizure by Officer Dickerson**

3. Officer Dickerson initially violated Jahqulia's rights by getting into his squad car and chasing Jahqulia down without reasonable suspicion or probable cause to believe that she had committed a crime.

4. The illegal seizure of Jahqulia's vehicle and person by Officer Dickerson was done in such a manner that no reasonable person would have thought that they were free to leave.

5. The illegal seizure of Jahqulia's vehicle and person was a deprivation of her civil rights to be free from unlawful seizures under the Fourth Amendment.

6. The purpose of Officer Dickerson pursuing and seizing Jahqulia was not for any lawful purpose, rather it was to teach her a lesson about what Officer Dickerson perceived to be a slight against him, which in fact did not occur.

**SECOND COUNT – False Arrest by Officer Dickerson and Officer Craven**

7. Officer Dickerson violated the Plaintiff's rights by placing her under arrest without probable cause to believe that she had committed a crime. Officer Craven assisted with the arrest.

8. The purpose of Officer Dickerson placing Jahqulia under arrest was not for any lawful purpose, rather it was to teach her a lesson about what Officer Dickerson perceived to be a slight against him, which in fact did not occur.

9. The false arrest of Jahqulia was a deprivation of her civil rights to be free from arrest without necessary probable cause under the Fourth Amendment.

**THIRD COUNT – False Imprisonment**

10. Officer Dickerson, Officer Craven, Officer Gould, and/or Doe Officers violated the Plaintiff's rights by having her booked into the Laurel Municipal Jail without reasonable suspicion or probable cause to believe that she had committed a crime.

11. The false imprisonment was a deprivation of her liberty without the requisite due process of law as defined under the Fourteenth Amendment.

**FOURTH COUNT – Malicious Prosecution**

12. Officers Dickerson and Officer Gould violated the Plaintiff's rights by filing false charging documents against Jahqulia and/or by executing a false affidavit to support her prosecution and to justify her arrest.

13. Officer Dickerson initiated the prosecution against Jahqulia for the purpose of retaliating against her for questioning his false seizure of her.

14. Officer Dickerson testified falsely against Jahqulia.

15. Officer Craven was prepared to testify falsely against Jahqulia.

16. Jahqulia was found to be not guilty of any criminal act for the incident described above. No reasonable person with knowledge of the facts would believe that she had committed a crime at the time of her arrest and subsequent prosecution.

**SIXTH COUNT – Failure to Intercede and Prevent the Violation of Rights**

17. Officers Craven, Gould, and Myers failed to intercede on behalf of Jahqulia even though they knew or should have known that the actions being taken by Officer Dickerson were an egregious violation of Jahqulia's rights.

18. Officers Craven, Gould, and Myers knew and/or should have known that Jahqulia was unjustifiably seized, arrested, jailed and/or prosecuted. The Officers knew and/or had a duty to know that Jahqulia's constitutional rights were violated.

19. Officers Craven, Gould, and Myers all had realistic opportunities to intervene to prevent the constitutional violations from occurring.

20. Defendants are liable for Officers Craven, Gould, and Myers failing to intercede on Jahqulia's behalf to stop the violations under .

**SEVENTH COUNT – Monell Claim**

21. On information and belief, the Laurel Police Department has a custom and culture of violating the constitutional rights of others. Though not a written policy, this custom was so widespread as to have the force of law.

22. The Laurel Police Department has a history of wrongfully tolerating, condoning, and encouraging constitutional violations. As a result, the custom and culture at the Laurel Police Department is to protect its officers when they violate the constitutional rights of others. The Laurel Police Department only disciplines deputies, if at all, when their actions are exposed by third-party video, making the misconduct impossible to deny or explain away.

23. Tommy Cox and the Laurel Police Department have a well-established history of failing to properly train, supervise, investigate, and discipline its deputies when they violate the constitutional rights of the citizens in Laurel, Mississippi.

24. The Laurel Police Department has a history of fabricating facts and falsely testifying against arrestees and victims of excessive force to cover up these constitutional violations.

25. The Laurel Police Department has acted with deliberate indifference to a pattern of past occurrences of constitutional violations of citizens such that its deputies feel empowered to violate the constitutional rights of its targets with impunity.

26. These customs and practices are the moving force behind the violations of the Plaintiff's rights enumerated herein.

27. Plaintiffs are aware of many other situations where the Laurel Police Department violated the constitutional rights of others.

28. Chief Tommy Cox has never taken corrective action to fix the culture within his department. If fact, Chief Tommy Cox encourages it.

29. Chief Tommy Cox and the Laurel Police Department have a demonstrable pattern and practice of improperly training, supervising, and disciplining deputies.

#### **E. DAMAGES**

1. The Defendants are liable to the Plaintiff, jointly and severally, for all wrongful acts which harmed and caused damage to the Plaintiff.

2. The Defendants are liable for damages for all violations of the civil rights of the Plaintiff under the Constitution of the United States as defined by 42 U.S.C. 1983.

3. Based on the facts and circumstances described in this Complaint, and as a direct result of said acts and omissions of the Defendants, the Plaintiff has suffered damage to reputation; past pain and suffering; past, present, and future emotional distress; and other financial losses.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests a JURY TRIAL, and that after a jury trial a judgment be entered against Defendants, jointly and severally, as follows:

1. Compensatory damages of at least \$250,000 or such other amount supported by the evidence at trial;
2. Punitive damages in an amount to sufficiently deter the bad behavior described in this Complaint;
3. Attorney fees and costs of suit under 42 U.S.C. § 1988;
4. Ordinary taxable costs of suit;

5. Prejudgment and post-judgment interest at the legal rate; and
6. Any and all other further relief as the Court deems appropriate.

Respectfully submitted, May 7, 2024.

**JAHQULIA STEVENS**  
  
By: \_\_\_\_\_  
Matthew W. Lawrence

Matt Lawrence Law Firm  
525 N. Main Street  
Hattiesburg, MS 39401  
(408) 605-8473  
mattlawrencelawfirm@gmail.com  
MSB # 105958