

**IN THE CIRCUIT COURT OF RANKIN COUNTY, MISSISSIPPI**

**MICHAEL JENKINS**

**PLAINTIFF**

**v.**

**CIVIL ACTION NO. \_\_\_\_\_**

**STEVE GAINES, Individually**

**DEFENDANT**

**COMPLAINT AND DEMAND FOR JURY TRIAL**

**I. INTRODUCTION**

**COMES NOW** the plaintiff, Michael Jenkins, by and through counsel and files this Complaint against the Defendant, Steve Gaines, and would show unto the Court as follows:

1. The plaintiff, Michael Jenkins is an adult resident citizen of Simpson County, Mississippi.
2. The defendant, Steve Gaines, is a Rankin County Supervisor acting under color of state law and is sued in his individual capacity. He can be served at his place of employment at 221 North Timber Street Brandon, MS. 39042-3193.
3. This Court has jurisdiction under Mississippi law.
4. This Court has concurrent jurisdiction over federal claims under 42 U.S.C. § 1983.
5. Venue is proper in Rankin County, Mississippi, because the events giving rise to this action occurred within this County.

**II. JURISDICTION AND VENUE**

6. This action arises from false, malicious, and defamatory statements made by Defendant Steve Gaines on May 3, 2025, while acting under color of state law.

7. Defendant publicly accused Plaintiff Michael Jenkins of committing serious criminal acts, including rape and drug-related offenses.
8. These statements were made two days after Rankin County publicly announced a multimillion-dollar settlement with Plaintiff arising from misconduct by county deputies.
9. The statements were false, defamatory per se, widely disseminated, and caused severe reputational and emotional harm, and were made during the course and scope of Gaines's employment for Rankin County, who is vicariously liable for Gaines' acts under the doctrine of respondent superior.

### **III. FACTUAL ALLEGATIONS**

10. On January 24, 2023, Plaintiff was a victim of severe misconduct by Rankin County deputies, resulting in litigation against Rankin County.
11. The notorious case received national attention, and Plaintiffs Michael Jenkins and Eddie Parker became known far and wide.
12. That litigation resulted in a multimillion-dollar settlement publicly announced on May 1, 2025.
13. On May 3, 2025, Defendant Gaines spoke at a sheriff-associated public breakfast attended by approximately 100 individuals, including news media, who reported his comments widely.
14. During this event, Defendant Gaines, referencing the attorney who litigated the County's defense, and the Plaintiffs [Jenkins and Parker] in that case, stated:

“He beat the pants off of those guys — the dopers, the people that raped and doped your daughters.”

15. Defendant made this statement in reference to Plaintiffs of the civil suit and their recent settlement.
16. The statement accused Plaintiff Jenkins of committing rape and other serious crimes.
17. At the time Gaines' statement was made, Plaintiff Jenkins had never been charged with or convicted of any criminal offense.
18. Defendant knew the statements were false or acted recklessly without regard for their truth.
19. The statement was recorded and subsequently published by *Mississippi Today* on May 6, 2025, and republished on May 13, 2025.
20. The statement was further disseminated through broadcast media, including WAPT News, and circulated widely online and through social media.
21. Therefore, the statements reached a broad audience beyond those present at the event.
22. Rankin County had knowledge of the statements through widespread media coverage.
23. Rankin County failed to issue any correction, retraction, or discipline.
24. This failure constitutes ratification of Defendant Gaines' conduct.

25. Public reporting has documented a pattern of misconduct within Rankin County law enforcement, including criminal convictions of deputies involved in the underlying incident.
26. The County's failure to address such misconduct demonstrates deliberate indifference.
27. As a direct result, Plaintiff suffered reputational harm, humiliation, and emotional distress.

#### **IV. CAUSES OF ACTION**

##### **COUNT I – DEFAMATION (SLANDER PER SE)**

28. Plaintiff incorporates all preceding paragraphs.
29. The actions of the Defendant, Steve Gaines in which he publicly called the plaintiff and Eddie Parker “dopers” and “the people who raped and doped your daughters” was defamatory and slanderous per se.
30. Defendant knew the statement was false or acted with reckless disregard to the rights of the plaintiff to be secure in his reputation. .
31. Plaintiff suffered reputational harm, humiliation, and emotional distress for which the Defendant, Steve Gaines should be held liable.

##### **COUNT II – FALSE LIGHT INVASION OF PRIVACY**

32. Plaintiff incorporates all preceding paragraphs.
33. Defendant publicly portrayed Plaintiff Parker as an individual who committed rape and drug-related crimes.

34. This portrayal was false and highly offensive, was widely disseminated through media and public channels.
35. Defendant acted with knowledge of falsity or reckless disregard of the rights of the plaintiff.
36. As a result of the actions of the Defendant, Plaintiff suffered emotional distress and reputational harm for which the Defendant should be held liable.

## **VI. DAMAGES**

37. Plaintiff is entitled to compensatory damages.
38. Plaintiff is entitled to punitive damages.

**WHEREFORE**, Plaintiff requests judgment in his favor, compensatory and punitive damages, attorney's fees, and all other relief deemed proper.

Respectfully submitted,

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