



1. At all material times Jay Blackfox has been the Sheriff of Delaware County, Oklahoma (hereafter “Sheriff”).
2. Delaware County, Oklahoma is a political subdivision of the State of Oklahoma (hereafter “County”).
3. Except as otherwise indicated, all acts and omissions referred to herein occurred within the two years prior to the filing of this Complaint.
4. This Complaint arises under the Civil Rights statutes of the United States, specifically 42 U.S.C. § 1983.
5. Pursuant to 42 U.S.C. § 1983, this Court has jurisdiction.
6. All material allegations herein occurred within the Northern District of Oklahoma, thereby making venue proper in this Court.
7. The Sheriff is the final policy maker for all material conduct of the Sheriff of Delaware County and of the Sheriff’s Office of Delaware County. There is no person who has authority over the Sheriff of Delaware County, acting in his capacity as sheriff. Both as to his own conduct and as to the conduct of his employees, because of his position as Sheriff of Delaware County, the Sheriff of Delaware County’s acts, customs, policies, practices, failure to train and failure to supervise his employees alleged herein are attributable to the County as well as to the Sheriff in his official capacity.
8. Sheriff Blackfox is sued herein in his official capacity, for his own acts and those of his predecessor, if any, in his official capacity.
9. All of the conduct alleged herein of the Sheriff of Delaware County and of his identified employees was the exercise of state authority within the meaning of 42 U.S.C. § 1983.

10. Recognizing the extraordinary vulnerability of persons who are inmates of a county jail for any reason and the extraordinary opportunities of sheriffs and of employees of sheriffs to prey upon the vulnerability of such persons, the statutes of the State of Oklahoma specifically protect such persons by mandating that any state, federal, county, municipal or political subdivision employee who has sexual intercourse with a person under the supervision of the Sheriff's Office of Delaware County is guilty of the crime of rape. 21 O.S. § 1111 (A) (7). Just as is the case for sexual intercourse with underage persons, consent is no defense to the crime of rape as described therein.

11. Recognizing the extraordinary vulnerability of persons who are inmates of a county jail for any reason and the extraordinary opportunities of sheriffs and of employees of sheriffs to prey upon the vulnerability of such persons, the statutes of the State of Oklahoma specifically protect such persons by mandating that any state, federal, county, municipal or political subdivision employee who commits sodomy on a person under the supervision of the Sheriff's Office of Delaware County is guilty of the crime of forcible sodomy. 21 O.S. § 888 (B) (4). Just as is the case for sexual intercourse with underage persons, consent is no defense to the crime of forcible sodomy as described herein.

12. Recognizing the extraordinary vulnerability of persons who are inmates of a county jail for any reason, as well as of persons under the supervision of the Drug Court, and the extraordinary opportunities of sheriffs and employees of sheriffs to prey upon the vulnerability of such persons, the statutes of the State of Oklahoma specifically protect such persons by mandating that any state, federal, county, municipal or political subdivision employee who commits sexual battery on a person under the supervision of the Sheriff's Office of Delaware County is guilty of the crime of sexual battery. 21 O.S. § 1123 (B). Just as is the case for sexual

intercourse with underage persons, consent is no defense to the crime of sexual battery as described herein.

13. Sheriff Blackfox has established as the policy, custom, usage and practice of (a) the Sheriff of Delaware County, (b) the Sheriff's Office of Delaware County, and (c) (by virtue of his position as Sheriff of Delaware County) Delaware County, Oklahoma, that the employees of the Sheriff of Delaware County are permitted to engage in rape, sodomy, sexual battery and blackmail as described herein, as the policy, custom, usage and practice of the Sheriff of Delaware County, the Sheriff's Office of Delaware County, and of Delaware County, Oklahoma.

14. Sheriff Blackfox has further established as the policy, custom, usage and practice of (a) the Sheriff of Delaware County, (b) the Sheriff's Office of Delaware County, and (c) (by virtue of his position as Sheriff of Delaware County), Delaware County, Oklahoma, that the employees of the Sheriff's Office of Delaware County may, as a matter of the policy, custom, usage and practice of the Sheriff of Delaware County and of Delaware County, Oklahoma and/or as a matter of Sheriff Blackfox's failure to train and failure to supervise those employees, commit sexual battery on inmates of the Delaware County jail as well as commit all of the outrageous sexual advances, sexual harassment and sexual humiliation described herein.

15. These acts of rape, sodomy, sexual battery and blackmail described herein and committed by employees of the Sheriff of Delaware County deprived the identified Plaintiffs of their rights under the Fourth and Fourteenth Amendments to the Constitution of the United States to be free from unreasonable searches and seizures, their rights under the Fifth and Fourteenth Amendments to the Constitution of the United States to be afforded due process of law, and their rights under the Fifth and Fourteenth Amendments to the Constitution of the United States to have equal protection of the law and thereby not suffer the sexual degradation described herein.

A reasonable person would have known that these acts of rape, sodomy, sexual battery and blackmail described herein deprived the identified Plaintiffs of their Constitutional rights as set forth in the preceding sentence.

16. The acts of sexual battery, outrageous sexual advances, sexual harassment and sexual humiliation committed by Sheriff Blackfox's employees as described herein deprived the identified Plaintiffs of their rights under the Fourth and Fourteenth Amendments to the Constitution of the United States to be free from unreasonable searches and seizures, and their rights under the Fifth and Fourteenth Amendments to the Constitution of the United States to be afforded equal protection and due process of law. A reasonable person would have known that Sheriff Blackfox's employees' acts of sexual battery, outrageous sexual advances, sexual harassment and sexual humiliation described herein and/or his failure to train and failure to supervise his employees deprived the identified Plaintiffs of their Constitutional rights as set forth in the preceding sentence.

17. The identified employees' sexually degrading acts described herein were committed with deliberate indifference to the Constitutional rights of Plaintiffs set forth herein, and were the direct and proximate cause of Plaintiffs' damages. A reasonable person would have known these Constitutional rights were being violated as a result of the alleged conduct.

18. Plaintiff Sherry England was incarcerated in the Delaware County Jail from June 25, 2007 through July 7, 2007 on a charge of public intoxication.

19. During this time, she was housed in a cell block designed to hold 10 inmates, having only 3 cells and 10 beds. At times, there were as many as 20 women held in the cell block. It was summertime, and the conditions were hot, crowded and deplorable.

20. Also during this time, the Delaware County jailers would “bargain” with the female inmates to show their breasts in exchange for cigarettes, cupcakes, snacks, candy, personal items, and other things they could not obtain for themselves while in the Delaware County jail.

21. The jailers would listen over the intercom and when they knew female inmates were in the showers or using the toilet, the jailers would come in and watch the women come out of the shower and/or using the toilet.

22. While Ms. England was taking a shower, the jailers would just come in. The jailers would “bargain” with the female inmates to drop their towels to the floor in exchange for being taken outside for cigarettes and other favors. Ms. England began taking her clothes with her and getting dressed in the shower.

23. There were no female jailers at night. At night, the jailers would come into the cells in the pods and grope the female inmates. Almost all of the male jailers were involved, including but not limited to, Bill Sanders, “Head Jailer Lonnie”, “Leon”, “Damen”, “Don”, “Carlos”, “Lane”, and a policeman from the City of Spavinaw who worked part-time at night as a Delaware County jailer.

24. At night the male jailers would bring T-shirts and boxer shorts into the pods for the female inmates to wear in the hot cells in exchange for “favors”.

25. Sometimes when female inmates would be called out of their cells to go to the front to get their medications, the jailers would grope and/or kiss them.

26. Ms. England refused to show her breasts and rejected the jailers' advances. In retaliation and with deliberate indifference to her medical needs, the jailers withheld her medications and would not let her see the doctor.

27. Ms. England is an epileptic and requires prescription medication to prevent seizures. Ms. England had her prescription medication with her when she was booked into the Delaware County Jail and the jailers took it away from her. Due to the jailers' deliberate indifference to Ms. England's medical needs and refusing her medication, Ms. England began suffering bad seizures while in the Delaware County Jail.

28. Ms. England repeatedly asked to see the doctor and her requests were ignored by the jailers with deliberate indifference to her medical needs. The jailers told Ms. England that she didn't have any rights because she was in jail.

29. Ms. England had at least 5 bad seizures during those 18 days she was in the Delaware County Jail.

30. The depravity set forth in Paragraphs 18 through 29 violated Ms. England's Constitutional rights as set forth herein.

31. The depravity set forth in Paragraphs 18 through 29 subjected Ms. England to severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation.

32. Plaintiff Katrina Rogers was an inmate in the Delaware County Jail from January 11, 2008 through January 23, 2008.

33. Ms. Rogers was housed in the women's pod where there were only 2 cells with 4 beds per cell. Female inmates were sleeping in the shower because it was so crowded in the cells. There were at least 12-13 women in a cell at one time. There were cameras in the shower and Ms. Rogers knew the male jailers watched the female inmates while they showered.

34. Ms. Rogers was 5 months pregnant during this time so she put in a medical request to see the doctor. Deputy Bill Sanders ("Sanders") came to her cell personally within 2 hours of her request for a doctor. Sanders told Ms. Rogers that he had gotten her an appointment with a doctor the following day and would take her to the appointment himself.

35. The following morning as Ms. Rogers and Sanders were getting in the car at the Sheriff's office in Jay, Oklahoma, Sanders asked her, "Would you like to go see your mom?" Ms. Rogers indicated that she would as her mother's home was close to Dr. Hopper's office in Grove. As the car pulled away from the Sheriff's office, Sanders began groping Ms. Rogers' breasts as he was driving. Sanders also attempted to put his hand down Ms. Rogers' pants and kiss her. Sanders grabbed Ms. Rogers' hand and tried to put it on his penis.

36. Ms. Rogers was afraid to tell the doctor because she was terrified of the retaliation that Sanders threatened. After the doctor's appointment, Sanders stopped on the way back to the jail at the S&S Stop gas station on Highway 59 to get them something to eat. Sanders then said, "Since I did this for you, then you can pay me back" Sanders began rubbing Ms. Rogers' again, and again attempted to put her hand on his penis. Sanders did this throughout the drive back, including stopping at the smoke shop to buy cigarettes for the female inmates.

37. Sanders told Ms. Rogers that he needed her mother's phone number so that he could call her about her doctor's appointments. Ms. Rogers gave Sanders the phone number.



38. Sanders told Ms. Rogers that she could not tell anybody about anything he did, because if she did, he could make her time in jail worse and that once she got out of jail, he would see to it that Ms. Rogers got into more trouble. Sanders told Ms. Rogers, “[w]hen you get out, you need to come to my house and do this for me---I need to be with a woman. I need to have an orgasm and I want you to be the one to do it. You need to promise you’re going to do this.” Ms. Rogers did promise because she was intimidated into doing so. Ms. Rogers felt like she didn’t have a choice. Sanders told Ms. Rogers that he only wanted oral sex from her because she was pregnant.

39. While Ms. Rogers was in her cell at the Delaware County Jail, she heard Sanders ask another female inmate, Kori White, to show him her breasts and her crotch. Ms. White did show Sanders her breasts. Other female inmates saw this as well. Ms. Rogers spoke with Ms. White about telling on Sanders. Ms. White said that probably wasn’t a very good idea because she didn’t want Ms. Rogers to get into any more trouble and didn’t want anything to happen to Ms. Rogers.

40. Sanders told a female inmate that he would let her show him herself but he wouldn’t touch her because she was too fat. This inmate was so embarrassed and hurt that she cried.

41. Sanders kept telling Ms. Rogers, “I’m trying to get you out of here quicker. I’ve been talking to the Sheriff. But if I get you out of here, you need to make sure you come to my house and orgasm.”

42. After Ms. Rogers was released from the Delaware County Jail on January 23, 2008, Sanders would call her every day, telling her that he loved her and he wanted her to love him. Sanders continually asked her, “[w]hen are you going to come and do those things you promised me you would do when you were in jail?”

43. Sanders began not only calling Ms. Rogers every day, but began coming to her house repeatedly and offering her things. Approximately four or five days after her release, Sanders showed up at Ms. Rogers' house and demanded she go with him. Ms. Rogers' 3 year-old protested so Ms. Rogers said her daughter had to go with her if she was going anywhere. The daughter fell asleep sitting between them in Sanders' truck. Sanders then began to grope Ms. Rogers, trying to kiss her and making her grope him *over her daughter*. Sanders drove around the county roads for an hour and a half telling Ms. Rogers never to say anything about the incident because if he got into trouble, he would make sure she got into trouble at least as bad. Finally Ms. Rogers' daughter woke up and had to go potty, which made Sanders take them home.

44. Sanders continued to show up at Ms. Rogers' house (she lived with her mother) and if Ms. Rogers wasn't home, he would sit and wait. Sanders would wait for long periods of time talking to Ms. Rogers' mother. Sanders brought gifts to the mother, Ms. Rogers' children and Ms. Rogers.

45. As a result of the conduct of Deputy Sanders set forth above, Ms. Rogers has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation.

46. Plaintiff Cynthia Craig was an inmate at the Delaware County Jail from April 23, 2008 through July 15, 2008. Ms. Craig is mentally disabled.

47. Ms. Craig was held in a holding tank for 2-3 days, then put in general population.

48. Sanders told Ms. Craig that she looked good, that he liked her, and he wanted her to be "daddy's girl". Ms. Craig said she wasn't interested and Sanders then began to come to her cell,

get “handsy” with her and ask to see her crotch. Sanders would insert a finger inside Ms. Craig’s vagina and she would push him away.

49. Sanders took Ms. Craig to doctor appointments and wanted her to “play with him” when he was driving his patrol car in uniform. Ms. Craig would fight him off of her and Sanders would unzip his zipper and show his penis while he was driving. He told Ms. Craig to fondle him but she refused. On two occasions, Sanders pulled off the road in secluded areas and made Ms. Craig kiss him and then he began masturbating while he kissed her. These episodes lasted about a half an hour each, both on the way to the doctor’s office and on the way back to the jail.

50. Sanders told Ms. Craig that if she told anyone about it, that she would regret it and he would make sure she would go to the penitentiary by making up stories that she tried to escape or he had problems with her.

51. When Sanders returned to the Delaware County Jail, he forced Ms. Craig to answer questions like “nothing happened, right?; You know I was good to you?” Only later did Ms. Craig realize the reason Sanders was doing this was he was recording it.

52. Sometime between April 23, 2008 and June 2, 2008, Ms. Craig went to the Oklahoma Forensic Center for about 2 weeks for mental evaluation. There she was diagnosed as having Post Traumatic Stress Disorder. When she returned to the Delaware County Jail, she was placed into a protective holding cell after she had demanded to talk to Sheriff Blackfox. Sanders then entered the protective cell, put Ms. Craig in the shower, turned it on so that nobody could hear her, made her take her clothes off and put his fingers inside her vagina. Sanders started kissing Ms. Craig and then raped her vaginally and anally several times alternately. Ms. Craig was terrified to scream because Sanders told her he would send her down the river. When he was finished, Sanders made Ms. Craig scrub herself in front of him and he took her clothes with him

and brought her back a new regulation orange jumpsuit. Sanders came back for more but Ms. Craig refused, saying she didn't care what happened to her but he was not going to touch her again.

53. As a result of Sanders' conduct set forth above, Ms. Craig has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation.

54. Plaintiff Marie Watson was an inmate at the Delaware County Jail from May 20, 2008 through July 11, 2008.

55. During this time, the jail was overcrowded. At one time, there were 26 female inmates housed in a 2 cell pod with one toilet in each cell. The toilets were so overused that they backed up and the women were forced to stand in ankle-deep raw sewage for hours. This made some of the female inmates succumb to the jailers' demands to show their breasts or be groped in order to get out of the hot, grotesque conditions for any amount of time.

56. Sanders began approaching Ms. Watson after watching her get out of the shower. One Sunday, Sanders came to Ms. Watson and asked if she would like to go see her sister. She said she would and Sanders took her. On the way back to the jail, Sanders said, "every once in awhile, show me", while motioning for her to lift her shirt. He told he would give her cigarettes if she flashed him.

57. Sometime after that incident, Ms. Watson requested a doctor's visit for a bad ear infection. Sanders showed up to take Ms. Watson to the Indian Clinic in Jay, Oklahoma. On that occasion, Sanders rubbed her leg and tried to hold her hand.

58. Suddenly whereas it used to take up to one month to secure a doctor visit, Ms. Watson found herself with a doctor's appointment more and more frequently until she was actually going

twice a week. Each time, Sanders would take her, then he would pull off the road in a secluded area and grope her, lift up her shirt, and kiss and suck on her breasts. This would go on for an hour or more at a time. Sanders was always in his uniform and driving a white “police car” when these acts occurred.

59. The last time Sanders did this to Ms. Watson, he had tobacco juice all around his mouth and he tried to kiss her. When Ms. Watson refused the kiss, Sanders grabbed her by the hair, violently pulled her over to him and shoved his tongue down her throat. He then put his hands down her pants and inserted his finger into her, hurting her really badly. Ms. Watson was in leg shackles and couldn’t run and couldn’t fight him so she began screaming that she would tell everyone. Sanders then threatened Ms. Watson that he would have sent her to prison or killed if she ever mentioned what happened.

60. Sanders told Ms. Watson that she better not tell anyone because he knew where she lived and showed her a copy of her booking sheet with her address on it. Sanders told her that he had the last girl sent to prison and could have her sent there too. Sanders also told Ms. Watson that his family was in law enforcement in Disney or Langley and if she said a word, they would get rid of her. Sanders took the booking sheet and told Ms. Watson that he would carry it with him just in case.

61. Each time they would return from one of these “visits”, Sanders would have Ms. Watson talk into his microphone and tell the dispatcher that nothing happened between them. Ms. Watson asked Sanders why he did this and he said another girl had turned him in before so he was protecting himself.

62. Ms. Watson told Sheriff Blackfox about Sanders’ threat on her life. Sheriff Blackfox promised to get the booking sheet back if Ms. Watson wrote out a statement. Ms. Watson wrote

a statement but Sheriff Blackfox did not get the booking sheet back. This is why Ms. Watson lives in fear for her life in an undisclosed location.

63. As a result of Sanders' conduct and that of Sheriff Blackfox set forth above, Ms. Watson has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation.

64. Plaintiff, Jessica Rodas, was an inmate at the Delaware County Jail from October 3, 2007 through October 23, 2007.

65. During this time, on at least two (2) separate occasions, she was assaulted and sexually molested by Sanders while being transported for medical treatment in Delaware County.

66. On one occasion, on or about October 12, 2007, while being transported back to the Delaware County Jail from a doctor's visit in Grove, Oklahoma, Sanders left the main highway and took a back road through Zena, leading to the Delaware County Jail in Jay, Oklahoma. Along the way, Sanders pulled the Sheriff's vehicle over, and made Ms. Rodas get into the front seat. While she was handcuffed, Sanders proceeded to grope her and sexually assaulted her.

67. This assault was observed by two (2) other female inmates in the back seat who were also being transported in the police vehicle at the time. Ms. Rodas and the other two (2) female inmates were threatened by Sanders that if they said anything, he would "deny it" and "make sure they were in more trouble."

68. About October 22, 2007, while being transported to the Indian Clinic in Jay, Oklahoma, Ms. Rodas was similarly assaulted by Sanders again. Sanders then gave her cigarettes, and again threatened to "cause big trouble for her" if she reported the incident to anyone.

69. Upon her return, Ms. Rodas did confide in cellmates what had happened to her while being transported by Sanders.

70. As a result of the conduct of Deputy Sanders set forth above, Ms. Rodas has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

71. Plaintiff, Laurice Anderson, was an inmate in the Delaware County Jail from August 2007 through December 2007.

72. During this time, Ms. Anderson was housed in a single cell built for four (4) inmates, which at times would have as many as fourteen (14) female inmates in the cell.

73. Ms. Anderson was housed in "C Pod," where the conditions were deplorable. Because of the overcrowding, the sewer would back up into the cells, and the female inmates would be standing in raw sewage for long periods of time before any attempt was made to clean up the filth and stench.

74. On one occasion, while being transported back from the hospital after having chest pains, Ms. Anderson was groped and assaulted by Deputy Sanders.

75. On other occasions, while being transported to and from the doctor's office with other female inmates, Sanders would take a secluded back road to return to the jail. Along the way, he would pull the police vehicle over and require female inmates to get out of the back seat and sit next to him in the front seat of the vehicle. While they were still handcuffed, he would proceed to grope and sexually assault them. Each time the victim and witnesses were warned or were threatened that if they attempted to report the incident, he would "deny it occurred," and "make a lot of trouble for them."

76. On numerous occasions, Ms. Anderson and others would be denied over-the-counter pain medications like Tylenol. Ms. Anderson also observed other inmates being denied their requests for their prescription pain medications like Seroquel.

77. During this time, Ms. Anderson was aware of at least one (1) jailer named "John," having sexual intercourse with one of the inmates in the bathroom off the bubble where the control room was, or in the isolation room.

78. As a result of the conduct of Deputy Sanders set forth above, Ms. Anderson has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

79. Plaintiff, Melissa Nelson, was an inmate in the Delaware County Jail from November 2007 through December 2007.

80. During this time, Sanders would make lewd propositions to her and comment about the size of her breasts. Sanders would demand that she show him her breasts, but she refused to do so.

81. In early December 2007, while being transported back from a doctor's appointment in Grove, Oklahoma, Sanders pulled off on a back road on the return trip to the jail and sexually assaulted and molested Ms. Nelson. This occurred on a dirt road between Grove and Jay. There were dumpsters on the left-hand side of the road, not too far from a church with a white fence around it. The attack lasted approximately ten (10) minutes, during which time Ms. Nelson became increasingly upset and crying, as she tried to fight off Sanders. Sanders had locked the doors so she could not get out. When she begged him to stop, he said, "No! I'm in charge, and I have authority over you!"

82. Sanders was wearing a Delaware County Sheriff's shirt and driving a Delaware County Sheriff's vehicle at the time. Ms. Nelson kept trying to push him away, and began crying so hard that Sanders finally stopped the assault.



83. Sanders told Ms. Nelson that if she said anything to anybody, he would "kill her kids and her husband." She believed he would do that, since he worked in the Sheriff's Office, and said he "could find out anything."

84. On the way back to the jail, Sanders stopped at a convenience store and got Ms. Nelson some cigarettes. He told her to "smoke a couple of cigarettes before we get back to the jail, to calm you down."

85. Because of the threat against the lives of her children and her husband, Ms. Nelson did not report the incident when she returned to the jail.

86. Thereafter, Ms. Nelson had an allergic reaction to a prescription pain medication during which her blood pressure became dangerously elevated. Ms. Nelson repeatedly asked to see a doctor, and her requests were ignored by Jailer Holly, with deliberate indifference to her life-threatening medical needs.

87. Jailer Holly accused her of faking symptoms and refused her request for medical treatment. As a result of the failure to provide timely medical treatment, Ms. Nelson's condition proceeded to deteriorate, and she had a seizure. She then had to be rushed to the hospital by ambulance when she finally received medical treatment.

88. Before Ms. Nelson was released from the Delaware County Jail, Jailer Harvey Claunts propositioned her to have sex with him when she got out. He then told her where he lived and told her she needed to come by his house.

89. As a result of the conduct of Deputy Sanders and Jailers, Holly and Harvey Claunts, set forth above, Ms. Nelson has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

90. Plaintiff, Rebecca Blossom, was an inmate in the Delaware County Jail from January 2008 through March 2008.

91. During her incarceration in the Delaware County Jail, Ms. Blossom was housed with up to seven (7) other female inmates in a two-person cell.

92. During this time, Ms. Blossom was molested and sexually assaulted by Deputy Sanders no less than eight (8) times.

93. As with other Plaintiffs, the assaults would occur when Sanders was transporting Ms. Blossom to or from doctor's appointments, and in her case, a dental appointment as well.

94. The acts committed by Sanders included sodomy and sexual battery.

95. The assaults would usually occur on a remote rural road by an Indian Smoke Shop in Delaware County.

96. Sanders threatened Ms. Blossom with bodily harm to herself or her family, or having her sent to prison, if she said anything to anybody. Sanders said he had two (2) other girls sent to prison who had tried to tell on him. Sanders also told her he "had access to the jail computer," and "it would be easy to find out where she was."

97. These assaults caused Ms. Blossom to have increasing anxiety, and she could not sleep. As a consequence, she needed to be transported to the doctor on even more occasions, resulting in more attacks by Sanders.

98. By the time she was released from the Delaware County Jail, Ms. Blossom was on five (5) or six (6) different medications for anxiety, blood pressure and other complications caused by her ordeal in the Delaware County Jail.

99. Sanders told Ms. Blossom that she "needed to come see him after she got out of jail," because he "wanted to have sex with her."

100. In June 2008, Ms. Blossom was returned to the Delaware County Jail for failure to timely pay her fines. At this time, despite the prior threats from Sanders, Ms. Blossom and four (4) other inmates filed a formal, written complaint against Sanders regarding the sexual assaults that had been occurring. Nothing came of the grievances. Rather than terminating Sanders from duty, Sheriff Blackfox simply transferred Sanders to be in charge of the juvenile inmates in Delaware County.

101. As a result of Sanders's conduct, and that of Sheriff Blackfox set forth above, Ms. Blossom has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

102. BUSKIRK DELETED.

103. BUSKIRK DELETED.

104. BUSKIRK DELETED.

105. Plaintiff, Kimberly Bledsoe, was an inmate in the Delaware County Jail during the month of March 2008.

106. Ms. Bledsoe had been arrested and jailed on a charge of DUI. She had been drinking and was in a car wreck after learning of the death of her grandmother.

107. Ms. Bledsoe was incarcerated in the Delaware County Jail for approximately ten (10) days. During that period of time, her jail cell was so crowded that she had to sleep the entire time on the concrete floor, despite having experienced an injury to her ribs in the car accident.

108. While she was in the jail cell, Deputy Sanders began making comments about her breasts and how he "sure wanted to see them."

109. When Ms. Bledsoe told Sanders to leave her alone because she was in a lot of pain due to the injury to her ribs, Sanders told her he could arrange to take her to the emergency room that

day. Sanders then came back to the cell and transported her to the emergency room in Grove. In route, Sanders told her, "I did you a favor, now you need to do me a favor," and demanded that she show him her breasts, while driving to the emergency room. When she refused, he began groping her, which was severely painful because of her injured ribs, so she finally complied with his request. At the emergency room, Sanders threatened her not to say anything about what had happened, or he would "make trouble for her" when they got back to the jail. On the way back to the jail, Sanders took a rural road where Ms. Bledsoe again was groped and sexually assaulted. Sanders only stopped molesting Ms. Bledsoe because she was crying so hard and becoming hysterical.

110. After the assault, Sanders stopped at a convenience store and bought Ms. Bledsoe a Dr. Pepper. Then, while driving to the jail, he asked if he could come see her after she got out of jail, so he "could have sex with her."

111. Ms. Bledsoe thought, "How can this be happening? How can this be happening?" She stated she felt helpless and it just devastated her to think she had been put in a position where "someone like that could do something like that" against her will.

112. When they got back to the jail, Sanders threatened her not to tell anyone because "it would be bad for her, and they wouldn't believe her." After she got out of jail, Ms. Bledsoe told the lawyer who was representing her what Bill Sanders had done.

113. As a result of the conduct of Deputy Sanders set forth above, Ms. Bledsoe has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

114. Plaintiff, Tamela Taylor, was incarcerated in the Delaware County Jail from April 2008 through June 2008.

115. During this time, on at least five (5) occasions, Ms. Taylor was molested and sexually assaulted by Deputy Sanders.

116. On one occasion, while being transported to the doctor's office, Sanders began groping Ms. Taylor's breasts as he was driving. Sanders also attempted to put his hand down Ms. Taylor's pants and kiss her.

117. On another occasion, while Ms. Taylor was handcuffed in a doctor's office, actually waiting to be seen by the doctor, Sanders began groping and rubbing on her leg in the exam room. This continued for about ten (10) minutes until Sanders could hear the doctor coming toward the room.

118. Ms. Taylor also observed Sanders coming to the female inmates' cells and demanding that they flash their breasts to him, on the threat that he would withhold their allotted cigarettes or canteen items.

119. While in the Delaware County Jail, Ms. Taylor learned that Deputy Sanders had previously been terminated because of complaints by female inmates of sexual misconduct. However, he was later allowed to come back again by Sheriff Blackfox.

120. While incarcerated in the Delaware County Jail, Ms. Taylor learned that some jailers were having sex with inmates after they were released, for favors that were granted while they were in jail. Before she was released, Sanders told Ms. Taylor how beautiful she was and said he was going to "come by and see her" after she was released.

121. As a result of the conduct of Deputy Sanders set forth above, Ms. Taylor has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

122. Plaintiff, Katherine Buck, was incarcerated in the Delaware County Jail between May 2008 through July 2008.

123. During this time, Ms. Buck was held in a cellblock designed to hold four (4) inmates, having only four (4) bunks. At times there were as many as twenty-eight (28) women held in the cellblock. It was summertime, and the conditions were hot, crowded and deplorable.

124. During her time in the Delaware County Jail, she was aware of at least one (1) jailer named "John" who was having sexual relations with an inmate in the jail.

125. Ms. Buck also observed women being required to flash jailers in exchange for cigarettes and other items.

126. On one occasion, while she and Marie Watson were being transported to a dentist's office, she observed Ms. Watson being sexually molested by Deputy Sanders in the front seat of the Sheriff's vehicle. Ms. Buck was in the back seat.

127. On several occasions after Plaintiff, Marie Watson, was returned to the pod after being taken by Sanders to doctors' appointments, Ms. Buck would observe Ms. Watson taking four (4) and five (5) showers in a row.

128. During her incarceration in the Delaware County Jail, Ms. Buck learned that Deputy Bill Sanders had previously been suspended for complaints of sexual misconduct with female inmates, but he was hired back again before her incarceration in May 2008.

129. In July 2008, Ms. Buck joined several other female inmates in writing a letter about the sexual misconduct occurring between female inmates and Deputy Sanders during transport to medical visits.

130. After the letter was written and surreptitiously delivered to a person outside the jail, the jailers began turning the heat way up or turning the heat way down, adding to the misery of the appalling and crowded conditions in the Delaware County Jail.

131. The letter resulted in an investigation by the Sheriff. Despite these grievances against Sanders for a second time, Sheriff Blackfox did not terminate Sanders from duty. Instead, he transferred Sanders to oversee Delaware County juvenile inmates.

132. When no action on the letter was taken, Plaintiff, Marie Watson, told Ms. Buck that she was going to recant her statement against Deputy Sanders for fear of retaliation against her.

133. During her incarceration, a jailer named Leon constantly flirted with Ms. Buck and would do her unsolicited favors. On at least one occasion, he put money on her books without being asked to do so. After her release from the custody of the Delaware County Jail, Jailer Leon then began stalking her incessantly. He would be waiting outside her house when she got home from work. One time, when she had just gotten out of the shower, she looked out the window of her home and saw him standing there looking in at her. For a long time thereafter, Jailer Leon continued to follow her and would not leave her alone.

134. As a result of the conduct of Deputy Sanders, Jailer Leon, and Sheriff Blackfox, as set forth above, Ms. Buck has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

135. Plaintiff, Billie Jo Gandert, was an inmate in the Delaware County Jail from June 2008 through December 2008.

136. In August 2008, while being transported back from a doctor's office, Deputy Sanders began groping and molesting Ms. Gandert as he was driving. Sanders then attempted to make a deal with Ms. Gandert that he would give her cigarettes if she would allow him to see and touch

her. Ms. Gandert declined the invitation and refused to ever be transported by Sanders again.

Thereafter, she was taken to doctor visits by a jailer named "Al."

137. Ms. Gandert told other female inmates about what had occurred with Bill Sanders. She learned from other female inmates that the same thing had happened with them.

138. In June or July 2008, Ms. Gandert participated in signing a grievance letter against Deputy Bill Sanders. Ms. Gandert had personal knowledge of sexual battery by Deputy Sanders on other female inmates.

139. Ms. Gandert learned that in response to her grievance, Sanders was not terminated, but transferred to supervising juveniles in the Delaware County facility.

140. As a result of Sanders's conduct in the occurrences set forth above, Ms. Gandert has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

141. Plaintiff, Amy Johnson, was incarcerated in the Delaware County Jail from August 2008 through October 2008.

142. During this time, Ms. Johnson was housed in the women's pod where there were only two (2) cells and eight (8) beds. At times, there were over twenty (20) female inmates packed into the small pod. Inmates were sleeping in the shower and on the floor because it was so overcrowded in the cells.

143. During this time, Deputy Sanders solicited Ms. Johnson to allow him to feel and touch her in exchange for cigarettes. When she told him she did not smoke, he then offered to let her use his cell phone if she would let him touch her.

144. Ms. Johnson declined the solicitation.



145. In October 2007, on at least two (2) occasions while she was being transported for doctors' appointments, she was sexually molested, assaulted, and raped by instrumentation by Deputy Sanders. These assaults would occur when Sanders would leave the main highway and park along a back road in route to the jail.

146. Despite threats from Sanders not to tell anyone, Ms. Johnson told her attorney, Susa Hopper, about the incidents with Deputy Sanders, which were ignored.

147. Ms. Johnson wrote contemporaneous letters to her mother.

148. When she tried to file a written grievance, the jailer just tore it up right in front of her.

149. As a result of the conduct of Deputy Sanders, the jailers, and the Sheriff of the Delaware County Jail set forth above, Ms. Johnson has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

150. Plaintiff, Jacquelyn Blossom, was incarcerated in the Delaware County Jail from January 21, 2009 through January 29, 2009. She was previously incarcerated in the jail on several occasions between 1998 and 2007, and was familiar with the conditions, treatment, sexual improprieties of deputies and jailers involving female inmates during those times.

151. During the last time she was in the Delaware County jail in January 2009, once again, the only female jail pod was extremely overcrowded.

152. DELETED.

153. Sometimes it would take two (2) or three (3) days before requests for sanitary napkins and other female toiletries were provided, and then in grossly insufficient quantities.

154. Male jailers would solicit the female inmates to expose their breast to them in exchange for cigarettes, phone calls, extra food, and other inducements.

155. During the time of Ms. Blossom's last incarceration, head jailer "Lonnie" took her out of the B-Pod purportedly "to allow her to make a phone call. Instead, he took her down the hallway to the conference room which has no windows or cameras. There he began groping and molesting her grabbing her breasts under her shirt and shoving his hands down into her pants feeling her "there." Head Jailer "Lonnie" had similarly molested her during previous times she in the Delaware County Jail

156. DELETED.

157. When Jacquelyn Blossom thinks of the Delaware County Jail, it makes her skin crawl. She says, "When I think about their jailers and their deputies, it just makes me sick, because I know how they are, whether I have the proof, or whether somebody else has the proof. I know what they do."

158. As a result of the conduct of the jailers, Head Jailer "Lonnie", and the Sheriff of the Delaware County Jail, as set forth, Ms. Blossom has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

159. Plaintiff, Tammy Beavers, was incarcerated in the Delaware County Jail from September 2007 through November 2007, and from February 2008 through March 2008.

160. During this time, the jail pod where she and other female inmates were kept was extremely overcrowded.

161. At times there were 28 female inmates housed in a two-cell pod with only four (4) beds and only two (2) toilets.

162. During this time, she observed jailers requiring female inmates to flash their breasts in order to receive prescription and over-the-counter medications. If female inmates did not comply, medications were not given.

163. On one occasion, while being transported to the Indian Clinic in Jay, Oklahoma for medical treatment, Deputy Bill Sanders began groping her and molesting her while she was handcuffed in the front seat. On the return trip from the clinic to the jail, Deputy Sanders then groped and attempted to sexually assault Ms. Beavers again.

164. Thereafter, Ms. Beavers would not ask for any more medical appointments, though she needed to change her medications, for fear of being molested by Deputy Sanders while being transported again.

165. Ms. Beavers, who had asthma and other medical problems, then tried to alleviate her symptoms with requests for over-the-counter medications from the jailers. On many occasions, her requests were denied because she refused to flash her breasts to Sanders or the jailers.

166. During this time Ms. Beavers observed other female inmates would not be given their prescription medications upon request. They would be told their prescriptions were out, even though they may have been refilled just a few days earlier.

167. During her incarceration in the Delaware County Jail, Jailer, J.R. would make lewd and lascivious comments and sexual innuendoes to Ms. Beavers.

168. Ms. Beavers also had knowledge that Jailer, J.R. would make arrangements to bond out some female inmates in exchange for sexual encounters after their release.

169. As a result of the conduct of Deputy Sanders, the jailers, and the Sheriff of the Delaware County Jail, as set forth above, Ms. Beavers has suffered severe emotional distress, and/or

psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

170. Plaintiff, Debbie Back James, was incarcerated in the Delaware County Jail from October 2007 through November 2007.

171. During this time, she observed and had personal knowledge of numerous incidents where female inmates were requested to expose their breasts and were preyed upon and treated like sexual objects by the jailers.

172. When Deputy Bill Sanders would take Ms. James and other female inmates outside to wash cars and smoke, he would continually make lewd comments about her breasts and her body. On several occasions, he would rub his arm or hands across her breasts and ask her to participate in specific sex acts.

173. On one occasion, when Sanders was transporting Ms. James to a doctor's appointment in Grove along with two other female inmates in the car, he insisted that she and another female inmate in the back seat "make out with each other," so he could watch them in the rear view mirror. They pretended to do so by simply whispering to each other. Deputy Sanders later stopped at a convenience store and bought them pop and cigarettes.

174. Before her release from the Delaware County Jail, Sanders stated his grandson had Down's Syndrome, and offered Ms. James \$500 a month and free rent at his house after she got out of jail, if she would provide sexual services for him as well.

175. As a result of the conduct of Deputy Sanders and Sheriff Blackfox's failure to monitor, control, or stop this depraved treatment of female inmates in the Delaware County Jail, Ms. James has suffered severe emotional distress, and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

176. Plaintiff, Jamie Dale Fry Cook, was an inmate at the Delaware County Jail from June 23, 2008 to July 17, 2008.

177. During this time, she was assaulted and sexually molested by Deputy Sanders while being transported for medical treatment in Delaware County.

178. On one occasion, while being transported in a Delaware County Sheriff's vehicle from the jail to the Indian Clinic in Jay, Oklahoma, Deputy Sanders groped and sexually assaulted Ms. Cook as she was handcuffed and shackled in the front seat. Sanders was wearing a Delaware County Sheriff's uniform and badge at the time, and remained with Ms. Cook during her medical appointment at the clinic.

179. On the way back to the Delaware County jail from the clinic, Deputy Sanders took Ms. Cook to a pharmacy in Jay to fill the prescriptions given her at the clinic. After filling the prescriptions at the drive-thru window, Sanders proceeded to drive into an alley behind the pharmacy. While Ms. Cook was still handcuffed and shackled, he again sexually assaulted her, and raped her by instrumentation.

180. Ms. Cook was threatened by Sanders that if she said anything to anyone, he would "deny it" and "I know who your family is."

181. Upon arriving back at the jail, Deputy Sanders made Ms. Cook talk into a small tape recorder he had, stating nothing had happened between him and her during the transport.

182. Upon being locked back into jail, Ms. Cook confided in cellmates what had just happened to her while being transported by Sanders.

183. Several of the other women inmates in the pod then confessed the same things had happened to them while being transported on other occasions by Deputy Sanders.

184. Ms. Cook demanded to speak to Sheriff Jay Blackfox. Ms. Cook told Sheriff Blackfox what Deputy Sanders had done to her during the transport and that she wanted to file a complaint against him. She also told Blackfox that Sanders had similarly sexually assaulted several other female inmates in the jail at that time.

185. Sheriff Blackfox took Ms. Cook and the other female inmates who had been sexually assaulted by Sanders out of their cell into a separate room. Each was told to write out statements about what Sanders had done to them during the medical transports. They were told the statements would be held in strictest confidence. They were not.

186. Within days, the female inmates who had written out complaints against Deputy Sanders were all being retaliated against by the jailers. Even male inmate trustees were taunting them with details of the information they had described in their “confidential” complaints.

187. Ms. Cook learned that other complaints had previously been made months earlier by other female inmates about sexual assaults during transports by Deputy Sanders, but Sheriff Blackfox continued to allow Sanders to transport female inmates for the Sheriff’s office.

188. In response to the retaliation, the women who came forward with the complaints wrote a letter, which they all signed, begging for help from the outside. The letter was smuggled out of the jail to a former jailer-nurse, who began an inquiry into the matter. The inquiry came to an abrupt halt when she was found hung in her chicken coop.

189. As a result of the conduct of Deputy Sanders set forth above, Ms. Cook has suffered severe emotional distress and/or psychological damage and/or significant pain and suffering and/or personal humiliation and degradation.

190. Sheriff Blackfox and his identified employees were deliberately indifferent to the Constitutional rights of Plaintiffs set forth herein, by and through their identified acts and omissions.

191. Upon information and belief, Sanders had been previously either fired or suspended for sexual improprieties with female inmate.

192. Despite such prior conduct Sanders was re-hired and/or re-engaged by Sheriff Blackfox.

193. Female inmates wrote a letter or letters to Sheriff Blackfox complaining of Sanders' conduct in approximately June, 2007. The Sheriff then had the women write out separate statements and promised confidentiality.

194. The jailers then retaliated against the female inmates by screaming at them using terms directly from their "confidential" statements, putting 15 women in a four-person cell, turning the air-conditioning system off during the day and turning it on full blast at night, and turning off the water so that the women couldn't shower and denying access to medication all with deliberate indifference to the Plaintiffs Constitutional rights.

195. The Sheriff told the female inmates that they had been investigating Sanders for sexual improprieties with female inmates and his conduct for nine months already at the time their statements were written.

196. Despite the Sheriff's knowledge of Sanders' conduct prior to Sheriff Blackfox's administration and after it began, Sanders was allowed to remain employed at the Delaware County Jail until he died in November 2008.

197. Pursuant to 57 O.S. § 47, a Sheriff "shall have charge of the county jail of his county and of all persons by law confined herein..." It is the Sheriff's duty both statutorily and under the Constitution of the United States to make sure that the Constitutional rights of those whom he

imprisons are not violated. Sheriff Blackfox violated this duty owed to Plaintiffs with deliberate indifference to their Constitutional rights by hiring, failing to train and failing to supervise and/or Sanders and other employees.

198 Pursuant to 57 O.S. § 54, “[t]he Sheriff shall in all cases be liable for the negligence and misconduct of the jailers as of other deputies...”

199. Sheriff Blackfox failed to train Sanders and other jailers and deputies how to treat female inmates. This policy, custom, and usage of the Sheriff of Delaware County to fail to train the jailers and deputies was deliberately indifferent to Plaintiffs’ Constitutional rights and was a proximate cause of the violation of Plaintiffs’ Constitutional rights and the damages therefrom.

200. Sheriff Blackfox failed to properly supervise Sanders and other jailers and deputies while they were in charge of female inmates. This policy, custom, and usage of the Sheriff of Delaware County to fail to properly supervise and/or control the jailers and deputies was deliberately indifferent to Plaintiffs’ Constitutional rights and was a proximate cause of the violation of Plaintiffs’ Constitutional rights and the damages therefrom.

#### **FIRST CAUSE OF ACTION**

201. Paragraphs 1-186 are re-alleged.

202. Pursuant to 42 U.S.C. § 1983 the Sheriff of Delaware County is liable for damages to each of the Plaintiffs, as determined by a jury, as well as for attorney fees, costs of this action, interest as provided by law, and such other relief as is just and proper.

WHEREFORE, Plaintiffs pray for judgment against the Defendant, as follows:

- A. For an award of compensatory damages in an amount to be determined by a jury.



- B. For reasonable attorney fees, the costs of this action, interest as provided by law and for all other relief this Court deems just and proper.

s/ Gregory P. Williams, OBA No. 9647 for  
R. Thomas Seymour with permission  
R. Thomas Seymour, OBA No. 8099  
**SEYMOUR LAW FIRM**  
Philtower Building, Suite 1030  
427 S. Boston Avenue  
Tulsa, OK 74103  
Telephone (918) 948-6171  
Facsimile (800) 460-3446

And

s/Gregory P. Williams, OBA No. 9647  
Gregory P. Williams, OBA No. 9647  
**GREG WILLIAMS LAW OFFICE, PLLC**  
Philtower Building, Suite 355  
427 South Boston Avenue  
Tulsa, Oklahoma 74103  
(918) 948-6171  
(800) 460-3446  
Of Counsel  
**GARRETT LAW OFFICE, P.C.**  
111 W. 5<sup>th</sup> Street, Suite 800  
Tulsa, OK 74103  
Telephone (918) 549-6743  
Facsimile (918) 549-6741

And

s/ Gregory P. Williams, OBA No. 9647 for  
Scott A. Graham, OBA No. 19817 and  
Anthony L. Allen, OBA No. 19738 with permission  
**GRAHAM, ALLEN & BROWN, PLLC**  
PHILTOWER BUILDING, SUITE 355  
427 SOUTH BOSTON AVENUE  
TULSA, OKLAHOMA 74103  
(918) 948-6171  
(800) 460-3446

**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of February 2011, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Chris Collins, Esq.  
Ambre Gooch, Esq.  
Phil Anderson, Esq.  
Collins, Zorn & Wagner, P.C.  
429 N.E. 50<sup>th</sup>, Second Floor  
Oklahoma City, Oklahoma 73105  
[cjc@czwglaw.com](mailto:cjc@czwglaw.com)  
Attorneys for Defendant

s/Greg Williams  
Greg Williams