

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

_____	:	
JENNIFER REYNOLDS, ASHLEY	:	
McCORMICK, HERBERT CARTER,	:	
and DEVON SHEPARD, both individually	:	
and on behalf of a class of others similarly	:	Civil Action Number
situated,	:	07-CV-1688
	:	
Plaintiffs,	:	
	:	AMENDED
v.	:	CLASS ACTION COMPLAINT
	:	
THE COUNTY OF DAUPHIN,	:	
	:	JURY TRIAL DEMANDED
Defendant.	:	
_____	:	

INTRODUCTION

This is a class action brought to redress the deprivation by Defendant County of Dauphin of rights secured to the Plaintiffs and proposed Class by the United States Constitution and the laws of the United States of America. Dauphin County has a policy or practice of strip-searching all individuals who enter the Dauphin County Prison and are placed into jail clothing, regardless of the crime upon which they are charged, and has had such a policy or practice during the duration of the class period proposed in this complaint. Upon information and belief, this policy is, in part, derived from the written procedures of Dauphin County, and was promulgated by senior Dauphin County Prison officials.

It is well established in this judicial circuit that individuals charged with misdemeanors or summary offenses cannot be strip-searched absent particularized reasonable suspicion that they possess weapons or contraband. In short, the policy of Dauphin County to force those charged

with minor crimes to undergo the indignities of a strip search upon entry into the Dauphin County Prison is not only clearly illegal, but is insensitive and unnecessary.

Plaintiffs bring this action on behalf of themselves, and on behalf of a class of thousands of others who were strip searched after being charged with petty crimes, to vindicate the clear and unnecessary violation of their civil rights and those of the class members they propose to represent. Plaintiffs were all charged with summary offenses, and all were subjected to a strip search, in violation of their rights against unreasonable searches under the Fourth Amendment of the United States Constitution. Plaintiffs seek monetary damages for themselves and each member of the proposed class, a declaration that the Dauphin County Prison policies are unconstitutional, and an injunction precluding Dauphin County from continuing to violate the rights of those placed into their custody. With this as a background, Plaintiffs complains as follows:

JURISDICTION

1. This Court has jurisdiction over this action under the provisions of 28 U.S.C. §§ 1331, 1341 & 1343 because it is filed to obtain compensatory damages and injunctive relief for the deprivation, under color of state law, of the rights of citizens of the United States secured by the Constitution and federal law pursuant to 42 U.S.C. §§ 1981 & 1983. This Court also has jurisdiction over this action under the provisions of 28 U.S.C. § 2201, as it is filed to obtain declaratory relief relative to the Constitutionality of the policies of a local government.

2. Venue is proper under 28 U.S.C. § 1391(e)(2) because the events giving rise to Plaintiff's claims and those of proposed class members occurred in this judicial district.

PARTIES

3. Plaintiff Jennifer Reynolds is a citizen of the United States and resides in the State of Maryland. On or about September 2, 2007, Ms. Reynolds was arrested and placed in the Dauphin County Prison on charges of assembly without a proper permit, a violation of the Harrisburg City Code.

4. Plaintiff Ashley McCormick is a citizen of the United States and resides in Dauphin County, Pennsylvania. On or about September 13, 2007, Ms. McCormick was arrested and placed in the Dauphin County Prison for failing to pay parking tickets in the City of Harrisburg.

5. Plaintiff Herbert Carter is a citizen of the United States and resides in the State of Maryland. On or about September 2, 2007, Mr. Carter was arrested and placed in the Dauphin County Prison on charges of assembly without a proper permit, a violation of the Harrisburg City Code.

6. Plaintiff Devon Sheppard is a citizen of the United States and resides in the State of Maryland. On or about September 2, 2007, Ms. Sheppard was arrested and placed in the Dauphin County Prison on charges of assembly without a proper permit, a violation of the Harrisburg City Code.

7. Defendant County of Dauphin (the "County") is a county government organized and existing under the laws of the Commonwealth of Pennsylvania. At all times relevant hereto, the County, acting through its Prison Board of Inspectors, was responsible for the policies, practices, supervision, implementation and conduct of all matters pertaining to the Dauphin County Prison and was responsible for the appointment, training, supervision and conduct of all

Dauphin County Prison. In addition, at all relevant times, the County was responsible for enforcing the rules of the Dauphin County Prison, and for ensuring that personnel employed in the Dauphin County Prison obey the Constitution and laws of the United States and of the Commonwealth of Pennsylvania.

CLASS ACTION ALLEGATIONS

8. Plaintiff brings this action pursuant to Rules 23(b)(2) and 23(b)(3) of the Federal Rules of Civil Procedure on behalf of himself and a class of similarly situated individuals who were charged with misdemeanors or minor crimes and were strip searched upon their entry into the Dauphin County Prison.

9. The class that Plaintiff seeks to represent is defined as follows:

All persons who have been or will be placed into the custody of the Dauphin County Prison after being charged with misdemeanors, summary offenses, violations of probation or parole, civil commitments, or minor crimes and were or will be strip searched upon their entry into the Dauphin County Prison pursuant to the policy, custom and practice of the County of Dauphin. The class period commences on September 16, 2005 and extends to the date on which Dauphin County is enjoined from, or otherwise ceases, enforcing their unconstitutional policy, practice and custom of conducting strip searches absent reasonable suspicion. Specifically excluded from the class are Defendants and any and all of their respective affiliates, legal representatives, heirs, successors, employees or assignees.

10. This action has been brought and may properly be maintained as a class action under Federal law and satisfies the numerosity, commonality, typicality and adequacy requirements for maintaining a class action under Fed. R. Civ. P. 23(a).

11. The members of the class are so numerous as to render joinder impracticable. Upon information and belief, there are hundreds of people arrested for misdemeanors and violations who are placed into the custody of the Dauphin County Prison every month -- all of

whom are members of the proposed class. Upon information and belief, the size of the proposed class totals at least 7,000 individuals, some of whom have had their civil rights violated on multiple occasions.

12. Upon information and belief, joinder of all of these individuals is impracticable because of the large number of class members and the fact that class members are likely dispersed over a large geographical area, with some members presently residing outside of Dauphin County and this Judicial District. Furthermore, upon information and belief, many members of the class are low-income persons, may not speak English, and likely would have great difficulty in pursuing their rights individually.

13. Common questions of law and fact exist as to all members of the Class, in that they all had their right to be free from unreasonable searches violated by Defendant's conducting strip searches absent particularized suspicion. All members of the class were charged with misdemeanors or violations when placed into the custody of the Dauphin County Prison, and all were illegally strip searched in violation of the established law in this judicial circuit.

14. Plaintiffs' claims are typical of the claims of the members of the Class. Plaintiffs and all members of the class sustained damages arising out of Defendant's course of conduct. The harms suffered by the Plaintiff are typical of the harms suffered by the class members.

15. The representative Plaintiffs have the requisite personal interest in the outcome of this action and will fairly and adequately protect the interests of the Class. Plaintiffs have no interests that are adverse to the interests of the members of the Class.

16. Plaintiffs have retained counsel who have substantial experience and success in the prosecution of class action and civil rights litigation.

17. In short, Plaintiffs' counsel has the resources, expertise and experience to successfully prosecute this action against Dauphin County. Counsel for the Plaintiff knows of no conflicts among members of the class or between counsel and members of the class.

18. This action, in part, seeks declaratory and injunctive relief. As such, the Plaintiffs seek class certification under Fed. R. Civ. P. 23(b)(2), in that all class members were subject to the same policy requiring the illegal strip searches of individuals charged with misdemeanor or minor crimes and placed into the custody of the Dauphin County Prison. In short, the County of Dauphin has acted on grounds generally applicable to all class members.

19. In addition to certification under Rule 23(b)(2), and in the alternative, Plaintiffs seek certification under Rule 23(b)(3).

20. Common questions of law and fact exist as to all members of the Class, and predominate over any questions that affect only individual members of the Class. These common questions of law and fact include, without limitation, the common and predominate question of whether the Defendant's written and/or *de facto* policy of strip searching all individuals charged with misdemeanors or minor crimes and committed to the Dauphin County Prison is a violation of the Fourth and Fourteenth Amendments to the United States Constitution, and whether such a written and/or *de facto* policy existed during the class period.

21. A class action is superior to other available methods for the fair and efficient adjudication of this controversy, since joinder of all of the individual members of the class is impracticable given the large number of class members and the fact that they are dispersed over a large geographical area. Furthermore, the expense and burden of individual litigation would make it difficult or impossible for individual members of the class to redress the wrongs done to

them. The cost to the federal court system of adjudicating thousands of individual cases would be enormous. Individualized litigation would also magnify the delay and expense to all parties and the court system. By contrast, the conduct of this action as a class action in this District presents far fewer management difficulties, conserves the resources of the parties and the court system, and protects the rights of each member of the Class.

22. Upon information and belief, there are no other actions pending to address the Defendants' flagrant violation of the civil rights of thousands of individuals.

23. In the alternative to certification under Fed. R. Civ. P. 23(b)(3), Plaintiffs also seek partial certification under Fed. R. Civ. P. 23(c)(4).

FACTS

Facts Applicable to the Class Generally

24. The Fourth Amendment of the United States Constitution prohibits government agencies, such as the County of Dauphin and the Corrections Officers it supervises, from performing strip searches of arrestees who have been charged with misdemeanors or other minor crimes unless the officers in question have reasonable suspicion to believe that the arrestee is concealing a weapon or contraband.

25. Upon information and belief, the County of Dauphin has instituted a written and/or *de facto* policy, custom or practice of strip searching all individuals who enter the custody of the Dauphin County Prison and are placed into jail clothing, regardless of the nature of their charged crime and without the presence of reasonable suspicion to believe that the individual was concealing a weapon or contraband.

26. The Dauphin County Prison is the local jail used by Dauphin County to mostly house pre-trial detainees, as well as individuals sentenced to local time. While Dauphin County refers to its local jail as a “prison,” and this complaint utilizes the formal name for the facility, “Dauphin County Prison,” provided by the County, Dauphin County’s local jail is most certainly not comparable to a state prison, which houses only sentenced detainees facing lengthy sentences.

27. Upon information and belief, the County of Dauphin has instituted a written and/or *de facto* policy, custom or practice of conducting visual body cavity searches (visual inspection of the vaginal and rectal cavities) on all individuals who enter the custody of the Dauphin County Prison, regardless of the individual characteristics or the nature of their charged crime. For purposes of this Complaint, strip and visual cavity searches are collectively referred to as “strip searches.”

28. The County of Dauphin knows that it may not institute, enforce or permit enforcement of a policy or practice of conducting strip searches without particularized, reasonable suspicion.

29. The Defendants’ written and/or *de facto* policy, practice and custom mandating wholesale strip searches of all misdemeanor and violation arrestees has been promulgated, effectuated and/or enforced in bad faith and contrary to clearly established law.

30. Reasonable suspicion to conduct a strip search may only emanate from the particular circumstances antecedent to the search, such as the nature of the crime charged, the particular characteristics of the arrestees, and/or the circumstances of the arrest.

31. Upon information and belief, the County of Dauphin has promulgated, implemented, enforced, and/or failed to rectify a written and/or *de facto* policy, practice or custom of strip searching all individuals placed into the custody of the Dauphin County Prison and placed into jail clothing without any requirement of reasonable suspicion, or indeed suspicion of any sort. This written and/or *de facto* policy made the strip searching of pre-trial detainees routine; neither the nature of the offense charged, the characteristics of the arrestee, nor the circumstances of a particular arrest were relevant to the enforcement of the policy, practice and custom of routine strip searches.

32. The preliminary discovery taken in this matter confirms that Dauphin County has a written and/or *de facto* policy or practice of conducting blanket strip searches. Dauphin County has produced the “strip search forms” for all four proposed class representatives, copies of which are attached hereto as Exhibit A. Three of these forms reflect that Ashley McCormick, Jennifer Reynolds and Herbert Carter were strip searched because they were “held with other detainees prior to commitment,” “not searched before being brought into prison,” and “held at HPD with others,” respectively. The Plaintiffs maintain that these proffered justifications for strip searches do not satisfy the requirements for individualized reasonable suspicion. The Plaintiffs maintain that the proffered justification to strip search Devon Shepard is illusory as well, given her criminal charges and background.

33. In short, the Plaintiffs maintain that the use of the “strip search forms” is nothing more than a cover for the fact that all detainees, regardless of criminal charge or reasonable suspicion, are strip searched upon their admission to the Dauphin County Prison.

34. Pursuant to this written and/or *de facto* policy, each member of the Class, including the named Plaintiffs, was the victim of a routine strip search upon their entry into the Dauphin County Prison. These searches were conducted without inquiry into or establishment of reasonable suspicion, and in fact were not supported by reasonable suspicion. Strip searches are conducted for individuals arrested for, among other innocuous offenses, Driving While Intoxicated, Harassment, Trespassing and a range of summary offenses.

35. As a direct and proximate result of the unlawful strip search conducted pursuant to this written and/or *de facto* policy, the victims of the unlawful strip searches -- each member of the class, including the named Plaintiffs -- has suffered or will suffer psychological pain, humiliation, suffering and mental anguish.

Facts Applicable to the Named Plaintiffs

36. Plaintiffs Jennifer Reynolds, Herbert Carter and Devon Sheppard were arrested on September 2, 2007 for a violation of the Harrisburg City Code, for allegedly assembling without a permit. Reynolds, Carter and Sheppard were arrested as part of the infamous actions of the Harrisburg Police on McCormick Island during the recent Labor Day weekend, and were transported to the Dauphin County Prison when they could not pay fines that were assessed upon them by a District Justice to ensure their appearance. Reynolds, Carter and Sheppard were all strip searched shortly after their admission to the Dauphin County Prison contemporaneous with their receipt of a jail uniform. All were released from the Dauphin County Prison shortly after their admission, when their family members paid the required fines necessary to secure their release.

37. Plaintiff Ashley McCormick was arrested on September 13, 2007 for failing to pay parking tickets issued by the City of Harrisburg, the bulk of which relate to her failure to move her car for street cleaning. McCormick was arrested by Magisterial District Court constables in her home when she was sleeping, and she was later transported to the Dauphin County Prison in her pajamas. Shortly after being taken to the prison, Ms. McCormick was strip searched immediately prior to receiving the jail uniform. Ms. McCormick was later released from the Dauphin County Prison after her family paid her fines.

38. Plaintiff Ashley McCormick is a resident of Dauphin County, and was incarcerated for not paying parking tickets. Without suggesting that Ms. McCormick is a habitual criminal, or, more precisely, a habitual recipient of parking tickets, it appears that individuals who fail to pay their parking tickets are routinely detained at the Dauphin County Prison. Consequently, there is a possibility beyond mere speculation that Ms. McCormick will be rearrested in the future, making it likely that she will again be subjected to the same illegal search procedure.

39. The arrests of all four plaintiffs were void of any reasonable suspicion to believe that they harbored any weapons or contraband.

40. As a direct and proximate result of the unlawful strip searches conducted pursuant to Dauphin County's policy, practice and custom, Plaintiffs have suffered and continue to suffer psychological pain, humiliation, suffering and mental anguish.

CAUSE OF ACTION

Violation of Constitutional Rights Under Color of State Law

-- Unreasonable Search and Failure to Implement Municipal Policies to Avoid Constitutional Deprivations, Under Color of State Law --

Demand for Declaratory Judgment and Injunctive Relief

41. Plaintiffs incorporate by reference and reallege each and every allegation stated in paragraphs 1 through 40.

42. The Fourth Amendment of the United States Constitution protects citizens from unreasonable searches by law enforcement officers, and prohibits officers from conducting strip searches of individuals arrested for misdemeanors or violations absent some particularized suspicion that the individual in question has either contraband or weapons.

43. The actions of Defendant Dauphin County detailed above violated Plaintiffs' rights under the United States Constitution. Simply put, it was not objectively reasonable for Dauphin County Corrections Officers to strip search Plaintiffs and Class members based on their arrests for misdemeanor/summary charges.

44. These strip searches were conducted pursuant to the policy, custom or practice of the County of Dauphin. As such, the County of Dauphin is directly liable for the damages of the Plaintiffs and members of the Class.

45. This conduct on the part of the Defendant represents a violation of 42 U.S.C. § 1983, given that their actions were undertaken under color of state law.

46. As a direct and proximate result of the unconstitutional acts described above, Plaintiff and the members of the Class have been irreparably injured.

47. The policy, custom and practice of the County of Dauphin is clearly unconstitutional, in that Corrections Officers of the Dauphin County Prison are directing/conducting the strip searches of all individuals placed into the Dauphin County Prison without any particularized suspicion that the individuals in question have either contraband or weapons.

48. Upon information and belief, this policy is currently in place at the Dauphin County Prison, with new and/or prospective members of the Class being subjected to the harms that have already been inflicted upon the Plaintiffs.

49. The continuing pattern of strip searching individuals charged with minor crimes will cause irreparable harm to the new and/or prospective members of the Class, an adequate remedy for which does not exist at law.

50. Plaintiffs demand that the County of Dauphin immediately desist from strip searching individuals placed into the custody of the Dauphin County Prison absent any particularized suspicion that the individuals in question have either contraband or weapons, and seeks both a preliminary and permanent injunction from this Court ordering as much.

51. Plaintiffs and members of the Class also request that this Court issue a declaratory judgment, and that it declare the strip search policy of the County of Dauphin to be unconstitutional.

DEMAND FOR TRIAL BY JURY

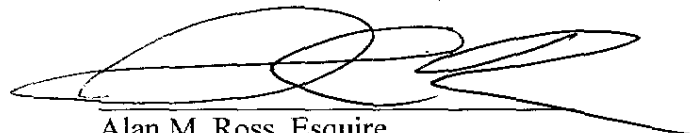
52. The Plaintiff hereby demands a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs Jennifer Reynolds, Ashley McCormick, Herbert Carter and Devon Sheppard, on behalf of themselves and on behalf of a class of others similarly situated, requests that this Honorable Court grant them the following relief:

1. An order certifying this action as a class action pursuant to Fed. R. Civ. P. 23.
2. A judgment against Defendant County of Dauphin awarding Compensatory Damages to Plaintiff and each member of the proposed class in an amount to be determined by a Jury and/or the Court on both an individual and a class wide basis.
3. A declaratory judgment declaring that the County of Dauphin's policy, practice and custom of strip and visual cavity searching all detainees entering the Dauphin County Prison, regardless of the crime charged or suspicion of contraband, to be unconstitutional and improper.
4. A preliminary and permanent injunction enjoining Defendant County of Dauphin from continuing to strip and visual cavity search individuals charged with misdemeanors or minor crimes absent particularized, reasonable suspicion that the arrestee subjected to the search is concealing weapons or other contraband.
5. A monetary award for attorney's fees and the costs of this action, pursuant to 42 U.S.C. § 1988 and Fed. R. Civ. P. 23;

Respectfully Submitted By:



Dated: November 20, 2007

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YS FOR PLAINTIFFS AND
THE PROPOSED CLASS

EXHIBIT A

PRETRIAL DETAINEE STRIP SEARCH FORM NO. 1 (PD-1)

Reynolds, Jennifer DCP#: D 71132
Name of Pretrial Detainee [printed]

CO Hockenberry DATE 9/3/07
Name of Corrections Officer [printed]

Identify specific factors, which establish reasonable suspicion that the Pretrial Detainee may possess a weapon, evidence of a crime, controlled substances, or other contraband. Check all that apply:

- The appearance and demeanor of the detainee;
- The nature of the criminal charges pending against the detainee;
- The detainee's prior arrest record (if known);
- Discoveries from prior arrests and/or prior searches of the detainee (if known);
- Detainee's conduct during the period of confinement;
- Detainee's known relationship with another inmate and/or detainee;
- Detainee's known history of suicide attempts or threats;
- Any other reasonable suspicion based upon specific circumstances that leads the corrections officer to suspect that the detainee is concealing weapons, evidence of the specific crime, controlled substances or other contraband.

Please Describe: inmate was not searched before
being brought into prison

CO Hockenberry
CORRECTIONS OFFICER SIGNATURE

REVIEWED BY:

APPROVED BY:

[Signature]
Shift Commander

[Signature]
Deputy Warden

PRETRIAL DETAINEE STRIP SEARCH FORM NO. 1 (PD-1)

Carter, Herbert G

DCP#: 71,161

Name of Pretrial Detainee [printed]

S Myers

DATE 9-3-07

Name of Corrections Officer [printed]

Identify specific factors, which establish reasonable suspicion that the Pretrial Detainee may possess a weapon, evidence of a crime, controlled substances, or other contraband. Check all that apply:

- The appearance and demeanor of the detainee;
- The nature of the criminal charges pending against the detainee;
- The detainee's prior arrest record (if known);
- Discoveries from prior arrests and/or prior searches of the detainee (if known);
- Detainee's conduct during the period of confinement;
- Detainee's known relationship with another inmate and/or detainee;
- Detainee's known history of suicide attempts or threats;
- Any other reasonable suspicion based upon specific circumstances that leads the corrections officer to suspect that the detainee is concealing weapons, evidence of the specific crime, controlled substances or other contraband.

Please Describe: Detainee held at HPD
with other possible contraband

S Myers

CORRECTIONS OFFICER SIGNATURE

REVIEWED BY:

[Signature]

Shift Commander

APPROVED BY:

[Signature]

Deputy Warden

PRETRIAL DETAINEE STRIP SEARCH FORM NO. 1 (PD-1)

SHEPPARD Devon DCP#: D71140
Name of Pretrial Detainee [printed]

CO Hockenberry DATE 9/3/07
Name of Corrections Officer [printed]

Identify specific factors, which establish reasonable suspicion that the Pretrial Detainee may possess a weapon, evidence of a crime, controlled substances, or other contraband. Check all that apply:

- The appearance and demeanor of the detainee;
- The nature of the criminal charges pending against the detainee;
- The detainee's prior arrest record (if known);
- Discoveries from prior arrests and/or prior searches of the detainee (if known);
- Detainee's conduct during the period of confinement;
- Detainee's known relationship with another inmate and/or detainee;
- Detainee's known history of suicide attempts or threats;
- Any other reasonable suspicion based upon specific circumstances that leads the corrections officer to suspect that the detainee is concealing weapons, evidence of the specific crime, controlled substances or other contraband.

Please Describe: detainee appeared to be hiding
contraband

CO Hockenberry
CORRECTIONS OFFICER SIGNATURE

REVIEWED BY:

APPROVED BY:

[Signature]

[Signature]

Shift Commander

Deputy Warden

PRETRIAL DETAINEE STRIP SEARCH FORM NO. 1 (PD-1)

McCormick, Ashley DCP#: D-71,220
Name of Pretrial Detainee [printed]

CO K Gallatin DATE 9-13-07
Name of Corrections Officer [printed]

Identify specific factors, which establish reasonable suspicion that the Pretrial Detainee may possess a weapon, evidence of a crime, controlled substances, or other contraband. Check all that apply:

- The appearance and demeanor of the detainee;
- The nature of the criminal charges pending against the detainee;
- The detainee's prior arrest record (if known);
- Discoveries from prior arrests and/or prior searches of the detainee (if known);
- Detainee's conduct during the period of confinement;
- Detainee's known relationship with another inmate and/or detainee;
- Detainee's known history of suicide attempts or threats;
- Any other reasonable suspicion based upon specific circumstances that leads the corrections officer to suspect that the detainee is concealing weapons, evidence of the specific crime, controlled substances or other contraband.

Please Describe: was held w/ other detainees
prior to commitment

CO K Gallatin
CORRECTIONS OFFICER SIGNATURE

REVIEWED BY:
[Signature]

APPROVED BY:
[Signature]

Shift Commander

Deputy Warden