

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY, LONDON DIVISION**

AMANDA HOSKINS and)
JONATHAN TAYLOR)
Plaintiffs,)

v.)

) Case No.

KNOX COUNTY, CITY OF)
BARBOURVILLE, Barbourville)
Police Officer in his Individual)
Capacity, MIKE BROUGHTON,)
Knox County Sheriff's Department)
Officers in their Individual Capacity,)
JOHN PICKARD, DEREK)
EUBANKS, Kentucky State Police)
Officers in their Individual Capacity)
JASON YORK , BRIAN JOHNSON,)
MARK MEFFORD, DALLAS)
EUBANKS, KELLY FARRIS,)
JACKIE PICKRELL, JASON)
BUNCH.)

) JURY TRIAL DEMANDED

Defendants.

COMPLAINT

NOW COME Plaintiffs, AMANDA HOSKINS and JONATHAN TAYLOR, by their attorneys LOEVY & LOEVY, and complaining of Defendants KNOX COUNTY, CITY OF BARBOURVILLE, Barbourville Police Officer MIKE BROUGHTON, Knox County Sheriff JOHN PICKARD and Knox County Sheriff's Department Officer DEREK EUBANKS, Kentucky State Police Officers JASON YORK, BRIAN JOHNSON, MARK MEFFORD, DALLAS EUBANKS, KELLY FARRIS, JACKIE PICKRELL, JASON BUNCH and other unknown officers from the Barbourville Police Department, Knox County Sheriff's Department, and Kentucky State Police, and state as follows:

Introduction

1. Plaintiffs Jonathan Taylor and Amanda Hoskins lost five years of their lives awaiting trial and facing a sentence of death for a crime they did not commit.

2. Mr. Taylor was wrongfully incarcerated for five years awaiting trial. Ms. Hoskins was tragically torn from her two children for three years while she was incarcerated in various Kentucky jails.

3. Over the course of five years, Plaintiffs lived in fear each day that they would be wrongfully convicted and sentenced to death.

4. This manifest injustice was not the result of mere flaws in the judicial system. Rather, the Defendants named herein conspired to take their liberty by knowingly initiating false charges based on evidence that the Defendants fabricated. Because it was fabricated, the evidence was flimsy and the Defendants never succeeded in obtaining a conviction.

5. Although the system functioned in the sense that all of the charges were eventually dismissed, the Defendants nevertheless succeeded in manipulating the system for five years. As a result, Mr. Taylor and Ms. Hoskins were deprived of their liberty as pretrial detainees just the same as if the Defendants had secured their wrongful convictions.

6. Mr. Taylor and Ms. Hoskins now bring this lawsuit to enforce the Constitutional right to liberty guaranteed to all citizens by the United States Constitution.

Jurisdiction and Venue

7. This action is brought pursuant to 42 U.S.C. § 1983 to redress the deprivation under color of law of Plaintiff's rights as secured by the U.S. Constitution.

8. This Court has jurisdiction of this action pursuant to 28 U.S.C. §§ 1331 and 1367.

9. Venue is proper under 28 U.S.C. § 1391(b) and (c). On information and belief, all parties reside in this judicial district, and the events giving rise to the claims asserted herein all occurred within this district.

The Parties

10. Plaintiff Jonathan Taylor is a 29 year-old resident of Pineville, Kentucky.

11. Plaintiff Amanda Hoskins is a 32 year-old residence of Pineville, Kentucky.

12. At all relevant times, Defendant Mike Broughton was a current officer with the City of Barbourville's Police Department. Defendant Broughton is sued in his individual capacity and acted under color of law and within the scope of his employment in engaging in the actions alleged in this complaint.

13. Defendant City of Barbourville is a Kentucky municipal corporation, and is and/or was the employer of Defendant Broughton. The City of Barbourville is responsible for the acts of Defendant Broughton while employed by the City of Barbourville and while acting within the scope of his employment. At all times

relevant to this Complaint, the City of Barbourville was a city with home rule as enabled, defined and empowered under KRS 83.410-83.660, as well as KRS Chapter 83A, 91, and 91A. Defendant City of Barbourville is responsible for the policies, practices, and customs of the Barbourville Police Department.

14. At all relevant times, Defendants John Pickard and Derek Eubanks were officers with the Knox County Sheriff's Department. Each of these Defendant Officers is sued in their individual capacity and each acted under color of law and within the scope of their employment in engaging in the actions alleged in this complaint.

15. Defendants Pickard and Derek Eubanks are referred to collectively as the "Knox County Defendants."

16. Defendant Knox County is local governmental entity organized under Kentucky law. Defendant Knox County is responsible for the policies, practices, and customs of the Knox County Sherriff's Department.

17. At all relevant times, Defendants Jason York, Brian Johnson, Mark Mefford, Dallas Eubanks, Kelly Farris, Jason Bunch, and Jackie Pickrell were current Kentucky State Police ("KSP") Officers. Each of these Defendant Officers is sued in their individual capacity and each acted under color of law and within the scope of their employment in engaging in the actions alleged in this complaint.

18. Defendants Jason York, Brian Johnson, Mark Mefford, Dallas Eubanks, Kelly Farris, Jason Bunch, and Jackie Pickrell are referred to collectively as the "KSP Defendants."

19. The individual defendants are referred to collectively as the “Defendant Officers.”

The Murder of Katherine Mills

20. Katherine Mills was found dead at her home in Flat Lick, Kentucky on December 20, 2010.

21. Police officers from the Barbourville Police Department, Knox County Sheriff’s Department, and the Kentucky State Police responded to the scene and subsequently conducted a joint investigation into her death.

22. Defendant Jason York, an officer for the Kentucky State Police, led the investigation. He and the other Defendant Officers believed from the beginning that the motive for Ms. Mills’ death was financially based. This theory was supported when the Defendant Officers discovered that approximately twelve-thousand dollars from Ms. Mills’ home was unaccounted for.

23. Within a month of the murder, the Defendant Officers learned significant evidence implicating two suspects who were desperate for money at the time that Ms. Mills was murdered. In spite of the mounting evidence, the Defendant Officers refused to charge those suspects and instead conspired to frame Plaintiffs for the murder of Ms. Mills.

24. The Defendant Officers reached this agreement and protected the two likely perpetrators because one of those suspects - Allen Helton - was an informant for them at the time of the murder.

**The Defendants Knew that Allen Helton and Mike Simpson
Likely Killed Ms. Mills**

25. Within days of discovering Ms. Mills, numerous witnesses informed the Defendant Officers that Allen Helton and Mike Simpson were responsible for her murder.

26. In fact, the Defendant Officers investigation revealed that Mr. Simpson called a friend on the morning of the murder to borrow money because he was broke. After interviewing the friend, the Defendant Officers learned that by the afternoon of December 20, 2010 – after Ms. Mills' was killed - Mr. Simpson was no longer in need of money and was driving a brand new vehicle.

27. Shortly thereafter, the Defendant Officers investigation uncovered that Mr. Helton and Mr. Simpson - who were desperately in need of money earlier in the day – drove their vehicle to Florida immediately after Ms. Mills was murdered. The Defendant Officers further learned that the vehicle was a blue rental car which was paid by Mr. Simpson with cash.

28. On December 24, 2010, Defendant York approached Mr. Simpson. Mr. Simpson had just returned from his trip to Florida with Mr. Helton. During that encounter, Mr. Simpson provided Defendant York with a sticky note that included the names of his alibi witnesses for the period of time that Ms. Mills was killed.

29. Notably, Mr. Simpson produced the note prior to Defendant York asking him any questions about the homicide. Defendant York never followed up with any of the alibi witnesses to determine the whereabouts of Mr. Simpson at the time of Ms. Mills' death.

30. Mr. Helton was also interviewed by the Defendant Officers. During his interview, Mr. Helton confessed that in the early afternoon of December 20, 2010, he and Simpson went to multiple locations to pay utility bills and then rented a vehicle in Middlesboro, KY. According to Mr. Helton, Mr. Simpson paid for the Florida trip with cash and revealed that they fled to Florida because they were in desperate need of pain pills.

31. By this point, the Defendant Officers investigation exposed that Mr. Helton and Mr. Simpson were desperate for money and looking to purchase large quantities of pain pills before Ms. Mills was killed. The Defendant Officers investigation also revealed that the suspects fled the state after Ms. Mills' death and were in possession of cash upon returning.

32. On January 21, 2011, Defendant York transported Mr. Helton and Jesse Lawson, Ms. Mills' grandson by marriage, to Frankfort, Kentucky for the sole purpose of conducting interviews and polygraph examinations. Defendant Pickard was present for portions of the interviews.

33. Defendants York and Pickard first questioned Mr. Helton at length about his involvement in the murder of Ms. Mills prior to subjecting him to a polygraph examination. During the examination, Mr. Helton denied any involvement in the murder of Ms. Mills.

34. The polygraph results revealed that Mr. Helton lied when he denied hitting Ms. Mills in the head and stealing money from her.

35. Defendant York interviewed Mr. Helton again after he failed the polygraph examination. In that interview, Defendant York said the following, “I’ll tell you this, and it ain’t no lie, I don’t care if you spent the money. I don’t care if you was in the car. I don’t care if you knew about it beforehand and didn’t tell nobody. I don’t care. You tell me the whole truth and I’ll promise you god as my witness right here, right now, that you will not spend one day in jail over it. I give you my word.”

36. Defendant York eventually kept his promise to Mr. Helton.

37. Defendants York and Pickard also interviewed Mr. Lawson prior to submitting him to a polygraph examination. During that interview, Defendant York informed Mr. Lawson that he knew “deep down inside that Mike [Simpson] did this.”

38. Defendant York also admitted to physically assaulting Mr. Lawson during a prior interview and promised to repeat the assault, stating “I’ll do it time and time again until I get to the bottom of this.” Mr. Lawson eventually revealed to the Defendants York and Pickard that he saw Mr. Simpson at Ms. Mills’ residence on the date of her murder.

39. Shortly thereafter, Mr. Lawson was subjected to a polygraph examination. There, Mr. Lawson denied any involvement in the murder.

40. The polygraph results revealed that Mr. Lawson lied when he denied participating in the murder of Ms. Mills.

41. The Defendant Officers investigation into Mr. Helton, Mr. Simpson, and Mr. Lawson continued after the polygraph examinations were conducted.

42. For instance, Mr. Helton was arrested on an unrelated charge on January 11, 2011. After his arrest, Mr. Helton was brought to the Barbourville police department where he was questioned by Defendants York and Pickard.

43. In that interview, Mr. Helton revealed that he fled to Florida in a blue vehicle with Mr. Simpson around the time of Ms. Mills' murder. Mr. Helton then confessed that he had "so much money" on this trip that he was able to use cash to rent the hotel rooms.

44. Thus, within the first few weeks of their homicide investigation, the Defendant Officers learned that: (1) a significant sum of money was stolen from Ms. Mills; (2) two suspects were in desperate need for money on the morning of her death; (3) those suspects fled the state immediately after the murder; (4) upon returning, the suspects were in possession of a large amount of cash and had prepared a note with a list of purported alibi witnesses; and (5) the suspects failed polygraph examinations relating to their involvement in the murder.

The Framing of Jonathan Taylor and Amanda Hoskins

45. In spite of the mounting evidence against the true perpetrators, the Defendant Officers conspired amongst themselves to frame Jonathan Taylor, Amanda Hoskins, and William Lester for the murder of Ms. Mills.

46. The Defendant Officers accomplished their task by coercing witnesses, fabricating statements, and committing other acts of egregious misconduct that

resulted in Ms. Hoskins and Mr. Taylor being denied due process for five years of their lives.

47. The Defendant Officers did this knowing that Mr. Helton and Mr. Simpson were likely responsible for killing Ms. Mills. However, instead of initiating charges against the true killers, the Defendant Officers reached an agreement to frame Mr. Taylor and Ms. Hopkins.

48. The Defendant Officers reached this agreement and protected the two likely perpetrators because Mr. Helton was an informant for them at the time of the murder.

49. The Defendant Officers knew that other investigations in which Mr. Helton was an informant would be jeopardized if he was held accountable for the murder of Ms. Mills. Thus, the Defendant Officers protected Mr. Helton and Mr. Simpson by burying evidence of their guilt and by manufacturing false evidence against Mr. Taylor, Ms. Hoskins, and Mr. Lester.

*Defendant York Promised Bob Smith Consideration
for Falsely Implicating Plaintiffs*

50. Bob Smith provided significant information to the Defendant Officers that implicated Mr. Helton and Mr. Simpson in the murder of Ms. Mills.

51. Specifically, Mr. Smith informed the Defendant Officers that Mr. Helton knew the police were tracking him through a GPS navigation device which had been purchased after the death of Ms. Mills with proceeds from the robbery for the Florida trip. Because of this, Mr. Helton begged Mr. Smith to take his GPS

device in exchange for pills. In doing so, Mr. Helton confessed that he no longer wanted the tracking device because he knew that the police were following him.

52. Mr. Smith also informed the Defendant Officers that Mr. Helton was in possession of a large sum of money after returning from Florida.

53. But the Defendant Officers were determined to bury the allegations made by Mr. Smith against Mr. Helton and Mr. Simpson. Because of this, the Defendant Officers refused to document any of the information provided by Mr. Smith that implicated Mr. Helton and Mr. Simpson in the murder of Ms. Mills.

54. On May 1, 2012, Defendants York and Pickard went to Mr. Smith's residence and promised to "sweep" his drug cases "under the rug" so long as he deviated from his prior allegations against Mr. Simpson and Mr. Helton and instead falsely implicated Mr. Taylor, Ms. Hoskins, and Mr. Lester in the murder of Ms. Mills.

55. Specifically, Defendants York and Pickard instructed Mr. Smith to state that Ms. Hoskins and Mr. Lester were spending significant sums of money on drugs purchases from Mr. Smith after Ms. Mills was murdered.

56. Mr. Smith informed the Defendant Officers that the information they sought was entirely untrue, and that, in fact, he had never even met Ms. Hoskins. But the Defendant Officers refused to accept Mr. Smith's refusals.

57. In their conspiracy to frame Plaintiffs for the murder of Ms. Mills, the Defendant Officers continued coercing witnesses and fabricating false evidence in

order to initiate illegitimate charges against Ms. Hoskins and Mr. Taylor for the murder of Ms. Mills.

Defendant Officers Fabricated Michael Crump's Identification of Plaintiffs

58. The Defendant Officers fabricated a police report claiming that an eyewitness named Michael Crump positively identified Mr. Taylor and Ms. Hoskins. Mr. Crump has since revealed that no such identification ever took place.

59. In the early morning hours of December 20, 2010, Mr. Crump was driving his family in Flat Lick, Kentucky. At approximately 8:00 a.m. that morning, Mr. Crump drove past Ms. Mills' residence. Mr. Crump slowed his vehicle as he drove past the residence. When doing so, he saw a small, blue, four-door vehicle backed into Ms. Mills' driveway. Mr. Crump then saw two individuals, a man and a woman.

60. Mr. Crump contacted the Defendant Officers after seeing media reports the following day.

61. A few weeks later, on February 2, 2011, Mr. Crump informed Defendants York and Pickard that he saw a male standing near the rear corner of Ms. Mills' home on the morning of her murder. Mr. Crump described the male as having long dark hair, facial hair consisting of peach fuzz, and wearing a hunter green or camo type hoodie that covered his head. Put simply, Mr. Crump described someone that did not match Mr. Taylor's appearance at the time.

62. Later that day, Defendants York, Pickard and Bunch met with Mr. Crump at his residence to interview him again.

63. In a recorded interview, Mr. Crump revealed to the Defendant Officers that he was unsure of the identity of the person he saw at Ms. Mills' residence on December 20, 2010. In fact, Mr. Crump never identified Mr. Taylor or anyone else because he was unable to see who actually was present at Ms. Mills' residence when he drove past. The Defendant Officers destroyed the recording and intentionally failed to document this information in a report.

64. In spite of Mr. Crump's insistence that he could not identify anyone, the Defendant Officers falsely reported that Mr. Crump identified Mr. Taylor as the male individual who was present at Ms. Mills' home at the time of her murder. The Defendant Officers further reported that Mr. Crump identified Ms. Hoskins as the female passenger in the blue vehicle.

65. According to Mr. Crump, he refused to identify Mr. Taylor as the murderer. In fact, Mr. Crump has revealed that he never identified Jonathan Taylor as the person he saw on December 20, 2010. Additionally, Mr. Crump has revealed that the woman in the blue car was not Ms. Hoskins.

66. The Defendant Officers fabricated and falsified reports claiming that he identified Mr. Taylor as the person who he saw on February 1, 2010 at Ms. Mills' residence.

Defendant York Fabricated Christy Branson's Statement

67. After fabricating Mr. Crump's identification, the Defendant Officers continued engaging in a conspiracy to frame Ms. Hoskins and Mr. Taylor for the murder of Ms. Mills.

68. On May 16, 2011, Defendant York fabricated a statement that he attributed to Christy Branson.

69. According to Ms. Branson's false statement, Ms. Hoskins confessed to her on five separate occasions while she was incarcerated at the Harlan County Jail. According to the statement, Ms. Hoskins went to the Mills residence with Joe King, Kayla Mills, William Lester, and Jonathan Taylor on December 20, 2010. While there, Mr. King assaulted Ms. Mills while Ms. Hoskins stole fifteen-thousand dollars from her purse.

70. The allegations attributed to Ms. Branson were false and fabricated by the Defendant Officers. The Defendant Officers coerced Ms. Branson into making these false allegations. In fact, Ms. Branson has since revealed that she has no knowledge of any confessions by Ms. Hoskins and no recollection of ever making the statements attributed to her by the Defendant Officers in this case.

Defendant York Fabricated Statements Attributed to Joe King

71. The Defendant Officers conspiracy did not end when they fabricated an identification which they attributed to Mr. Crump. The Defendant Officers then manufactured false confessions from jailhouse snitches in their effort to initiate illegitimate charges against Mr. Taylor and Ms. Hoskins. In fact, the Defendant Officers arranged for Ms. Hoskins to be frequently moved to various jails through Kentucky in an effort to discover the perfect inmate who would be willing to falsely implicate Ms. Hoskins in the murder.

72. To this end, Defendant York fabricated a statement from Joe King that falsely implicated Ms. Hoskins, Mr. Lester, and Mr. Taylor in the murder of Katherine Mills.

73. On June 24, 2011, Defendant York interviewed Mr. King at the Bell County Courthouse and created a report which documented this interview. The report manufactured by Defendant York is demonstrably false and was drafted as part of the Defendant Officers scheme to frame Ms. Hoskins, Mr. Taylor, and Mr. Lester for the murder of Ms. Mills.

74. According to Defendant York's report, Mr. King stated that he was in Pineville on December 19, 2010 when Ms. Hoskins and Mr. Lester approached him looking for money to get a prescription of Suboxone filled. The report claims that Mr. King gave money to Ms. Hoskins for the prescription prior to all three proceeding to a Walgreens in Pineville to obtain the Suboxone.

75. During this interaction, Ms. Hoskins and Mr. Lester supposedly informed Mr. King that they intended to rob Ms. Mills because she came into a bunch of money by selling timber. They were going to accomplish the task by having Ms. Hoskins dress up like a healthcare nurse. Defendant York's report further alleged that Ms. Hoskins contacted Mr. King a few days after the murder and revealed that she was able to purchase items from a pawnshop due to a recent settlement for ten thousand dollars.

76. The revelations attributed to Mr. King in Defendant York's report were false and fabricated.

The Defendants Falsified Allen Helton's Statement

77. By March of 2012, the Defendant Officers were fully determined to frame Ms. Hoskins and Mr. Taylor and close their investigation into Ms. Mills' death. In a matter of days, the Defendant Officers obtained a number of false statements that allowed them to initiate illegitimate charges against Ms. Hoskins and Mr. Taylor for the murder of Katherine Mills.

78. The first false statement obtained in March of 2012 was attributed to Allen Helton – an informant for the Defendant Officers and one of the likely true perpetrators.

79. On March 8, 2012, Defendants Pickard and York coerced Mr. Helton into providing a false statement that implicated Ms. Hoskins in the murder.

80. In his false statement, Mr. Helton alleged that he had a conversation with Ms. Hoskins and Mr. Lester the day before Ms. Mills was killed. In that conversation, Ms. Hoskins asked him if he wanted to make some money “by going in and tying this old woman up when she came out to the bathroom.” Mr. Helton then revealed that the woman Ms. Hoskins referred to was Katherine Mills.

81. Mr. Helton's false statement further alleged that he went to Mr. Simpson's home at 12:00 p.m. on December 20, 2010. Upon arriving, Mr. Helton had a conversation with Ms. Hoskins where she confessed that “we got the job done.” Mr. Helton knew that Ms. Hoskins was referring to the robbery of Ms. Mills because she had a “stack” of money with her at the time. Mr. Helton estimated that Ms. Hoskins was in possession of thousands of dollars. According to the statement,

Ms. Hoskins revealed that she obtained the money from the “job” that she previously mentioned to him.

82. Mr. Helton has since revealed that the statement he provided to the Defendant Officers was completely false and fabricated. The Defendant Officers promised Mr. Helton that he would not go to jail so long as he agreed to go along with the false and fabricated statement that they manufactured for him.

83. Because Mr. Helton faced criminal charges in other unrelated criminal cases at the time of the interview, the Defendant Officers promised to drop all those charges in exchange for his willingness to lie against Ms. Hoskins.

84. Unbeknownst to Defendants York and Pickard at the time they fabricated the statement, Ms. Hoskins was at a doctor’s appointment at the time that she supposedly confessed to Mr. Helton on December 20, 2010.

Defendant York Falsified Medical Records to Nullify Ms. Hoskins Alibi

85. Medical records illustrate that Ms. Hoskins was at a doctor’s appointment in Barbourville, Kentucky at the time that Mr. Helton’s statement alleges she confessed to him.

86. Specifically, medical records reveal that Ms. Hoskins arrived at Dr. Warren’s office at 11:54 a.m. on December 20, 2010. According to the false statement that the Defendant Officers manufactured for Mr. Helton, Ms. Hoskins confessed to him in Flat Lick, Kentucky at noon that day.

87. The Defendant Officers knew that Ms. Hoskins had to visit Dr. Warren’s office at a different time in order for Mr. Helton’s false statement to be

believed. Because the Defendant Officers manufactured Mr. King's false statement prior to obtaining Ms. Hoskins medical records, they were suddenly in a bind.

88. In an act of desperation, Defendant York and the other Defendant Officers altered Ms. Hopkins medical records in order to bolster Mr. Helton's fabricated statement. In doing so, Defendant York manipulated the records into indicating that Ms. Hopkins arrived at her doctor's appointment at 12:54 a.m. on December 20, 2010.

89. Defendant York and the other Defendant Officers subsequently produced the altered medical records to the Commonwealth in their effort to continue framing Ms. Hoskins and Mr. Taylor for the murder of Ms. Mills.

The Defendants Fabricated a Statement from Amber Simpson

90. After manufacturing a false identification, medical records, and numerous confessions, the Defendant Officers resorted to committing additional misconduct in their quest to frame Ms. Hoskins and Mr. Taylor. Specifically, they resorted to fabricating additional statements implicating the Plaintiffs in the murder of Ms. Mills. One of those false and fabricated statements was from Amber Simpson.

91. On March 13, 2012, Defendant York fabricated a statement by Amber Simpson that falsely implicated Mr. Taylor and Ms. Hoskins in the murder of Ms. Mills.

92. In the false statement, Ms. Simpson claimed that Mr. Taylor confessed to Ms. Mills' murder. Specifically, she stated that Mr. Taylor revealed that Mr.

Lester planned the murder and provided significant information to Mr. Taylor in order to carry it out.

93. According to the false statement, Kayla Mills was the look out while Mr. Taylor “took the hammer and hit her over the head” before “hit[ing] her again and realiz[ing] that she was dead. So he got the money.” Ms. Simpson further stated that Mr. Taylor confessed to placing “like five hundred dollar bills out in like a circle...half circle. And that her purse was laying beside it.”

94. Conveniently, Ms. Simpson’s statement also implicated Ms. Hoskins in the murder by stating that she was the person driving a blue Cavalier who was tasked with the responsibility of picking up Mr. Taylor and Ms. Mills up from the residence.

95. Ms. Simpson has revealed that Mr. Taylor never confessed to her and that the Defendant Officers manufactured her false statement. Through coercion and undisclosed promises of consideration, the Defendant Officers succeeded in obtaining a false statement from Ms. Simpson that implicated both Plaintiffs in the murder.

96. Defendant York provided Ms. Simpson with the false information that he wanted her to repeat. Specifically, Defendant York told Ms. Simpson to falsely claim that Mr. Taylor confessed to her. Defendant York then provided specific details to her about the murder and who he believed Mr. Taylor did it with.

97. After doing so, Defendant York promised Ms. Simpson a reward in exchange for her false and fabricated statement that implicated Ms. Hoskins and

Mr. Taylor. Defendant York also promised to have Ms. Simpson's brother released from jail in exchange for the false and fabricated statement.

The Wrongful Prosecution of Mr. Taylor and Ms. Hoskins

98. On March 14, 2012, Defendant York signed a criminal complaint and initiated charges against Mr. Taylor for the murder and robbery of Ms. Mills.

99. Defendant York arrested Mr. Taylor the following day on charges initiated the day before. During that interview, Defendant York made shocking threats to Mr. Taylor. In doing so, Defendant York promised Mr. Taylor that if he were to bond out or somehow beat the charges against him, then Defendant York "would do everything in [him] to get [Mr. Taylor] done away with."

100. On March 15, 2012, Defendant York met with Ms. Hoskins at the Laurel County Jail. At the beginning of this conversation, Defendant York threatened Ms. Hoskins by stating that he "got the tail I'm just looking for the donkey to pin it on." In that meeting, Defendant York confessed, "I know you didn't do it, I know you weren't there, and I know that you didn't have any involvement in it, but I do know that you know who did it." In response, Ms. Hoskins stated that she had no idea what Defendant York was talking about. Frustrated, Defendant York left the interrogation room and told Ms. Hoskins that she would be ready to talk by the time that she was finished sitting in jail.

101. Immediately thereafter, Defendant York signed a criminal complaint and initiated charges against Ms. Hoskins for the murder and robbery of Ms. Mills.

102. The Defendant Officers knew that the witness statements used to initiate these charges against Mr. Taylor and Ms. Hoskins were false, fabricated, and the product of improper coercion. Even still, the Defendant Officers used these statements to falsely initiate charges against Mr. Taylor and Ms. Hoskins.

103. At the time, the Defendant Officers knew that probable cause did not exist to initiate charges against Ms. Hoskins and Mr. Taylor. Nonetheless, the Defendant Officers continued to set Plaintiffs prosecution in motion.

104. In their conspiracy to frame Plaintiffs, sometimes acting alone and sometimes acting in concert, the Defendant Officers manipulated and manufactured a number of witnesses including Mr. Helton, Mr. King, Ms. Simpson, Mr. Beach, Ms. Branson, and Mr. Crump. The Defendant Officers threatened and coached these witnesses and others, and otherwise induced individuals who otherwise had no knowledge to be false witnesses, with the result that several witnesses made false statements about Mr. Taylor and Ms. Hoskins and falsely implicated them in the murder of Ms. Mills.

105. Although no one—not the Knox County court, not the prosecutors, and not Mr. Taylor and Ms. Hopkins or their attorneys—was aware of it at the time, the Defendant Officers fabricated or manipulated all of the evidence of guilt in this case, including the false statements and false testimony of other witnesses.

106. Prior to the dismissal of charges against Mr. Taylor and Ms. Hoskins, the Defendant Officers actively concealed the falsity of the evidence they fabricated, the methods by which they fabricated, and the scope of their fabrication.

107. As a result of the Defendant Officers continued fabrication of evidence, continued withholding of material exculpatory evidence, and continued manipulation of witnesses, Mr. Taylor and Ms. Hoskins were subject to continued prosecution on capital murder charges.

108. Sometimes acting alone, and sometimes acting in concert, the Defendant Officers, over the course of more than five years, also manipulated physical evidence, manufactured false inculpatory evidence, and lost or destroyed material exculpatory evidence.

109. The evidence that was fabricated, falsified, and manufactured by the Defendant Officers was the only evidence linking Mr. Taylor and Ms. Hoskins to the murder that they were charged with and was the only basis upon which prosecutors filed and maintained charges against them.

110. Sometimes acting alone and sometimes acting in concert, the Defendant Officers, over the course of five years, concealed from prosecutors, Mr. Taylor, Ms. Hoskins, and their defense counsel both the falsity of the witness statements and the unlawful methods by which they procured and fabricated this evidence.

111. Sometimes acting alone and sometimes acting in concert, the Defendant Officers, over the course of more than five years, withheld, concealed, or destroyed material exculpatory evidence, keeping that evidence from prosecutors, the court, Mr. Taylor, Ms. Hoskins, and their defense counsel.

112. The Defendant Officers actively misled prosecutors, who relied on the false evidence fabricated by the Defendant Officers to continue to pursue the prosecution of Mr. Taylor and Ms. Hoskins.

113. The Defendant Officers continued this misconduct even after the initiation of charges against Ms. Hoskins and Mr. Taylor. They did so through coercion and promises of consideration to jailhouse snitches.

Defendant York Fabricated a Statement from Daniel Wilson

114. On July 18, 2012, Defendants York and Mefford met with Daniel Wilson at the Roederer Correctional Complex in Lagrange, Kentucky. In this meeting, the two Defendants obtained a false and fabricated statement from Mr. Wilson.

115. On July 31, 2012, Defendants York created a police report which reiterated the false story that he and Defendant Mefford instructed Mr. Wilson to repeat. This false statement alleged that Mr. Taylor confessed to “killing an old woman over money” and that the murder was staged “by his cousin Amanda.” The statement further claimed that Mr. Taylor acted out the manner in which Ms. Mills was murdered by moving “his arms and hands when he described beating the lady.”

116. Mr. Wilson has since come forward and revealed that the statement was false and fabricated by the Defendants. In fact, Mr. Wilson informed the Defendants that Mr. Taylor never confessed to the murder and had always maintained his innocence. Thus, the Defendants knew that the statement they were manufacturing was false, but they continued to do it anyhow.

117. The Defendants promised Mr. Wilson significant consideration in exchange for his false and fabricated statement, including a promise to speak to the prosecutor in his case in an effort to get him released from prison.

Defendant York Fabricated a Statement from Robert Beach

118. The Defendant Officers also fabricated a statement attributed to an inmate named Robert Beach.

119. The Defendant Officers visited Margaret Polly in Somerset, Kentucky prior to February 24, 2014. At the time of this visit, Ms. Polly's brother, Robert Beach, was incarcerated in an Indiana correctional facility on a ten-year sentence for manufacturing methamphetamine.

120. During the visit, the Defendant Officers provided Ms. Polly with information about the murder of Ms. Mills. Specifically, the Defendant Officers informed Ms. Polly that an old lady was killed, robbed, and that fifteen thousand dollars was stolen from her in the process. The Defendant Officers informed Ms. Polly that her brother must have known about the murder because he was incarcerated in a county jail with one of the suspects.

121. Ms. Polly spoke to Mr. Beach by phone after the Defendant Officers left. In that conversation, Ms. Polly informed Mr. Beach that the Defendant Officers appeared at her home and informed Mr. Beach of all the details relating to the murder of Ms. Mills that were provided to her by the Defendant Officers.

122. On February 26, 2014, Defendants York and Brian Johnson traveled to the Branchville Correctional Facility to obtain a statement from Robert Beach.

123. In this visit, Mr. Beach informed Defendants York and Johnson that he was incarcerated with Mr. Taylor for a period of two weeks at the Whitley County Jail but that he had no information relating to the crime that led to Mr. Taylor's incarceration. Mr. Beach further revealed that he was never incarcerated in the same cell as Mr. Taylor.

124. Nonetheless, the Defendant Officers manufactured a statement claiming that Mr. Taylor confessed to Mr. Beach while they were incarcerated. In that statement, Mr. Beach claimed that Mr. Taylor confessed that a female relative called him and informed him that there was an easy robbery to be had where they could get money and drugs from an old lady. According to Mr. Beach, the robbery didn't go well and someone died.

125. That statement was false, as Mr. Taylor never confessed to Mr. Beach. The Defendant Officers provided Mr. Beach with all of the information in that statement and promised him undisclosed deals in order to get him to go along with their plan to frame Mr. Taylor and Ms. Hoskins for the murder of Ms. Mills.

Mr. Taylor and Ms. Hoskins' Vindication

126. For more than five years the Defendant Officers contrived to frame Mr. Taylor and Ms. Hoskins for the murder of Ms. Mills and deprived them of their freedom without due process of law.

127. The Commonwealth ultimately dismissed the charges against Mr. Taylor and Ms. Hoskins in a manner indicative of their innocence.

128. On June 29, 2016, the Commonwealth filed a lengthy motion to dismiss the charges pending against Mr. Taylor.

129. In that motion, the Commonwealth revealed that they had an obligation of not “pursuing charges or moving forward in matters in which probabl[e] cause of guilt is not present. Based on the changes in the testimony of the above witnesses and the unavailability of others the Commonwealth does not feel as though probable cause of guilt is present...”

130. On June 30, 2016, the trial court granted the Commonwealth’s motion and dismissed all charges against Mr. Taylor. On that date, after spending nearly five years in the Knox County Jail, Mr. Taylor was finally released into the loving arms of his close family and friends.

131. The Commonwealth filed a similar motion in Ms. Hoskins’ case on July 29, 2016. In that motion, the Commonwealth of Kentucky moved for the dismissal of all pending charges against Ms. Hoskins. The trial court granted the Commonwealth’s motion on August 22, 2016 and dismissed all charges against Ms. Hoskins.

Jonathan Taylor’s Damages

132. Jonathan Taylor spent five years incarcerated in the county jail for a crime he did not commit. He must now attempt to make a life for himself without the benefit of nearly five years’ worth of experiences, which normally equip adults for that task.

133. Additionally, the emotional pain and suffering caused by losing those years has been substantial. During his incarceration, he was stripped of the various pleasures of basic human experience, from the simplest to the most important, which all free people enjoy as a matter of right. Mr. Taylor missed out on the ability to share holidays, births, funerals, and other life events with loved ones, the opportunity to fall in love, to marry, and the fundamental freedom to live one's life as an autonomous human being.

134. As a result of the foregoing, Mr. Taylor has suffered tremendous damage, including but not limited to physical harm, mental suffering, and loss of a normal life, all proximately caused by Defendant Officers misconduct.

Amanda Hoskins' Damages

135. Amanda Hoskins spent more than three years incarcerated in various county jails for crimes she did not commit. After being released on bond, Ms. Hoskins continued to suffer as she faced capital murder charges for an additional two years, all while knowing she was entirely innocent and had nothing to do with the crime. She must now attempt to make a life for herself without the benefit of nearly five years of lost experiences, which normally equip adults for that task.

136. Additionally, the emotional pain and suffering caused by losing those years has been substantial. During her incarceration, she was stripped of the various pleasures of basic human experience, from the simplest to the most important, which all free people enjoy as a matter of right. Ms. Hoskins missed out on the ability to share holidays, births, funerals, and other life events with loved

ones, to raise her two children, the opportunity to fall in love, to marry, and the fundamental freedom to live one's life as an autonomous human being.

137. As a result of the foregoing, Ms. Hoskins has suffered tremendous damage, including but not limited to physical harm, mental suffering, and loss of a normal life, all proximately caused by Defendant Officers misconduct.

**Count I – 42 U.S.C. § 1983
Malicious Prosecution**

138. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

139. As described more fully above, all of the Defendant Officers, while acting individually, jointly and in conspiracy, as well as under color of law and within the scope of their employment, deprived Mr. Taylor and Ms. Hoskins of their constitutional right to be free from unlawful prosecution and continued detention without probable cause.

140. In the manner described more fully above, the Defendant Officers made, influenced and/or participated in the decision to prosecute Mr. Taylor and Ms. Hoskins for murder, for which prosecution there was no probable cause and which caused Mr. Taylor and Ms. Hoskins to suffer a deprivation of liberty. Their misconduct included falsifying evidence and withholding exculpatory and impeachment evidence.

141. As described more fully above, the prosecution was resolved in Mr. Taylor and Ms. Hoskins favor.

142. The Defendant Officers' misconduct directly resulted in the unlawful prosecution and continued deprivation of Mr. Taylor and Ms. Hoskins liberty in violation of their constitutional rights.

143. As a result of this violation of his constitutional rights, Mr. Taylor and Ms. Hoskins suffered injuries, including but not limited to bodily harm and emotional distress, as is more fully alleged above.

144. The Defendant Officers' misconduct, as described in this Count, was objectively unreasonable and was undertaken intentionally with malice and willful indifference to Mr. Taylor and Ms. Hoskins constitutional rights.

145. The misconduct described in this Count was undertaken pursuant to a routine practice of the City of Barbourville Police Department and the Knox County Sheriff's Department to pursue wrongful prosecutions and wrongful convictions through reckless and profoundly flawed investigations and coerced evidence. In this way, the municipal defendants violated Mr. Taylor and Ms. Hoskins' rights by maintaining policies and practices that were the moving force driving the foregoing constitutional violations.

146. These widespread practices, so well-settled so as to constitute *de facto* policy in the City of Barbourville Police Department and the Knox County Sheriff's Department, were able to exist and thrive because municipal policymakers with authority over these entities exhibited deliberate indifference to the problem, thereby effectively ratifying it.

147. The widespread practices described in the preceding paragraphs were allowed to flourish because the municipal defendants declined to implement sufficient training and/or enforce legitimate oversight and punishment.

**Count II – 42 U.S.C. § 1983 – Fourth and Fourteenth Amendments
Fabrication of False Evidence**

148. Each paragraph of this Complaint is incorporated as if restated fully herein.

149. In the manner described more fully above, the Defendant Officers, individually, jointly and in conspiracy with each other, fabricated evidence, including without limitation, false police reports, fabricated statements attributed to witnesses, and fabricated testimony offered at grand jury and other pretrial proceedings. The Defendant Officers knowingly fabricated this evidence and a reasonable likelihood exists that the false evidence affected the decision of the grand jurors and courts that considered this false evidence when determining whether probable cause existed.

150. The Defendant Officers were acting under color of law and within their scope of employment when they took these actions.

151. The Defendant Officers' misconduct directly resulted in the unjust continued incarceration of Mr. Taylor and Ms. Hoskins, thereby denying them from their constitutional right to due process as guaranteed by the U.S. Constitution. Absent this misconduct, there would have been no probable cause for Plaintiffs' continued detention, and the prosecution of Plaintiffs could not and would not have been pursued.

152. As a direct and proximate result of the Defendant Officers' actions, Mr. Taylor and Ms. Hoskins' constitutional rights were violated and they suffered from injuries and damages, including but not limited to the loss of liberty, physical sickness and injury, emotional pain and suffering, and other grievous and continuing injuries and damages as set forth above.

**Count III – 42 U.S.C. § 1983
Supervisory Liability**

153. Each paragraph of this Complaint is incorporated as if restated fully herein.

154. The continued wrongful detention of Plaintiffs was caused by the deliberate indifference and recklessness of supervisory defendants, including but not limited to Defendant Pickard and Defendant Pickrell, when they failed to adequately train and supervise the individual Defendant Officers.

155. Specifically, these supervisory defendants were personally involved in the case against Plaintiffs and knew or, in the absence of their deliberate indifference and recklessness, should have known of their subordinates' unconstitutional actions and related misconduct in the case.

156. Furthermore, these supervisory defendants failed to supervise the Defendant Officers in constitutionally adequate law enforcement practices, particularly those which concerned interviews of suspects and the production of exculpatory evidence, thereby encouraging and/or permitting these employees and other defendants to engage in a reckless investigation, to coerce and fabricate false

inculpatory evidence and to withhold exculpatory and impeachment evidence, which caused the constitutional deprivations suffered by Mr. Taylor and Ms. Hoskins.

157. These interview techniques, failures in producing exculpatory evidence, fabrications and other investigative procedures were contrary to accepted methods used by law enforcement agencies. The fact that the defendant supervisors failed to train and supervise their subordinates to ensure that they employed proper investigation procedures demonstrates deliberate indifference and reckless disregard for Mr. Taylor and Ms. Hoskins' constitutional rights.

158. The personal involvement of the defendant supervisors, through their actions and omissions, proximately and directly caused the constitutional deprivations and grievous personal injuries suffered by Mr. Taylor and Ms. Hoskins, including the above-mentioned injuries and damages.

159. The misconduct described in this Count was objectively unreasonable, and was undertaken intentionally, with malice, willfulness, and deliberate indifference to Mr. Taylor and Ms. Hoskins clearly established constitutional rights.

Count IV - 42 U.S.C. § 1983
Failure to Intervene

160. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

161. In the manner described above, during the constitutional violations described above, one or more of the Defendant Officers stood by without intervening to prevent the misconduct, despite having a reasonable opportunity to do so.

162. As a result of the Defendant Officers failure to intervene to prevent the violation of Mr. Taylor and Ms. Hoskins' constitutional rights, they suffered pain and injuries, as well as emotional distress.

163. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally and with willful indifference to Mr. Taylor and Ms. Hoskins' rights.

164. The misconduct described in this Count was undertaken pursuant to the policy and practice of the City of Barbourville Police Department and the Knox County Sheriff's Department in the manner described more fully in preceding paragraphs, and was tacitly ratified by policymakers for the municipal defendants with final policymaking authority.

Count V - 42 U.S.C. § 1983
Conspiracy to Deprive Constitutional Rights

165. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

166. After Ms. Mills was murdered, the Defendant Officers reached an agreement amongst themselves to frame Mr. Taylor and Ms. Hoskins for the crimes, and to thereby deprive them of their constitutional rights and their liberty to be continuously taken away from them, all as described in the various Paragraphs of this Complaint.

167. In this manner, the Defendant Officers, acting in concert with other unknown co-conspirators, conspired by concerted action to accomplish an unlawful purpose by unlawful means.

168. In furtherance of the conspiracy, each of the co-conspirators committed overt acts and was an otherwise willful participant in joint activity.

169. As a direct and proximate result of the illicit prior agreement referenced above, Mr. Taylor and Ms. Hoskins' rights were violated, and they suffered financial damages, as well as severe emotional distress and anguish, as is more fully alleged above.

170. The misconduct described in this Count was undertaken with malice, willfulness, and reckless indifference to the rights of others.

171. The misconduct described in this Count was undertaken pursuant to the policies and practices of the Barbourville Police Department and the Knox County Sheriff's Department in the manner described more fully in preceding paragraphs, and was tacitly ratified by policymakers for the municipal defendants with final policymaking authority.

Count VI - 42 U.S.C. § 1983
***Monell* Claim Against Defendant Knox County**

172. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

173. The actions of Knox County officers in withholding material exculpatory information from Mr. Taylor and Ms. Hoskins and their counsel were undertaken pursuant to the policies and practices of the Knox County Sheriff's Department, described above, which were ratified by policymakers for the Knox County Government with final policymaking authority. These policies and practices included the failure to adequately train, supervise, and discipline officers on the

requirements concerning the prompt disclosure of newly discovered evidence that exonerates a defendant following his arrest or conviction.

174. The policies and practices described in this Count were maintained and implemented by the Knox County Government with deliberate indifference to Plaintiffs' constitutional rights.

175. As a direct and proximate result of the Knox County Government's actions, Plaintiffs' constitutional rights were violated and they suffered injuries and damages, as set forth in this Complaint.

176. The Knox County Government is therefore liable for the misconduct committed by its officers.

Count VI - 42 U.S.C. § 1983
***Monell* Claim Against Defendant City of Barbourville**

177. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

178. The actions of Barbourville officers in withholding material exculpatory information from Mr. Taylor and Ms. Hoskins and their counsel were undertaken pursuant to the policies and practices of the City of Barbourville Police Department, described above, which were ratified by policymakers for the City of Barbourville with final policymaking authority. These policies and practices included the failure to adequately train, supervise, and discipline officers on the requirements concerning the prompt disclosure of newly discovered evidence that exonerates a defendant following his arrest or conviction.

179. The policies and practices described in this Count were maintained and implemented by the Barbourville Government with deliberate indifference to Plaintiffs' constitutional rights.

180. As a direct and proximate result of the Barbourville Government's actions, Plaintiffs' constitutional rights were violated and they suffered injuries and damages, as set forth in this Complaint.

181. The Barbourville Government is therefore liable for the misconduct committed by its officers.

**Count VIII – State Law Claim
Malicious Prosecution**

182. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

183. Through their actions as described above, the Defendant Officers caused Mr. Taylor and Ms. Hoskins to be improperly subjected to a prosecution for which there was no probable cause. These judicial proceedings were instituted and continued maliciously, resulting in injury, and all such proceedings were ultimately terminated in Mr. Taylor and Ms. Hoskins' favor and in a manner indicative of their innocence.

184. The Defendant Officers accused Mr. Taylor and Ms. Hoskins of criminal activities knowing those accusations to be without genuine probable cause; fabricated evidence and withheld the manner in which that evidence was fabricated; and made statements and reports to the police and/or prosecutors with the intent of exerting influence to institute and continue the judicial proceedings.

185. The misconduct described in this Count was undertaken with malice, bad faith, and in a wanton and reckless manner, and was undertaken by the Defendant Officers within the scope of their employment and/or official responsibilities.

186. As a result of this misconduct, Mr. Taylor and Ms. Hoskins suffered injuries, including bodily harm and emotional pain and suffering as more fully alleged above.

**Count IX – State Law Claim
Negligent Supervision**

187. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

188. The municipal defendants, as well as the supervisory defendants, including Defendant Pickard and Defendant Pickrell, had a duty to properly train and supervise officers, detectives, and supervisor employees of the Knox County Sheriff's Department and the Kentucky State Police, and to provide adequate policies to prevent the above conduct, including fabricating evidence, fabricating witness statements, and concealing material impeachment evidence.

189. The municipal defendants and the supervisory defendants were grossly negligent and negligent in the training, supervision and discipline of the Defendant Officers, resulting in Mr. Taylor and Ms. Hoskins being deprived of their right to due process, and their right to be free from false arrest, false imprisonment, and wrongful conviction.

190. As a result of this misconduct, Mr. Taylor and Ms. Hoskins suffered injuries, including bodily harm and emotional pain and suffering as more fully alleged above.

**Count X – State Law Claim
Intentional Infliction of Emotional Distress**

191. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

192. As described more fully in the preceding paragraphs, by framing Mr. Taylor and Ms. Hoskins for a murder they did not commit, the Defendant Officers intended to cause emotional distress, or knew or should have known that their actions would result in serious emotional distress.

193. In doing so, the Defendant Officers' conduct was extreme and outrageous, going beyond all possible bounds of decency such that it can be considered completely intolerable in a civilized society, and this conduct caused Mr. Taylor and Ms. Hoskins to suffer serious emotional distress of the nature no reasonable man or woman could be expected to endure.

194. The misconduct described in this Count was undertaken with malice, bad faith, and in a wanton and reckless manner, and was undertaken by the Defendant Officers within the scope of their employment.

195. As a result of this misconduct, Mr. Taylor and Ms. Hoskins sustained injuries, including emotional pain and suffering, as is more fully alleged above.

Count XI
Respondeat Superior

196. Each of the Paragraphs of this Complaint is incorporated as if restated fully herein.

197. In committing the acts alleged in the preceding paragraphs, some of the Defendant Officers were members and agents of the Barbourville Police Department and the Knox County Sheriff's Department, acting at all relevant times within the scope of their employment.

198. Defendants City of Barbourville and Knox County are liable as principals for all state law torts committed by their agents.

WHEREFORE, Plaintiffs, JONATHAN TAYLOR AND AMANDA HOSKINS, respectfully requests that this Court enter judgment in their favor and against Defendants KNOX COUNTY, CITY OF BARBOURVILLE, Barbourville Police Officer MIKE BROUGHTON, Knox County Sheriff JOHN PICKARD and Knox County Sheriff's Department Officer Derek Eubanks, Kentucky State Police Officers JASON YORK, BRIAN JOHNSON, MARK MEFFORD, DALLAS EUBANKS, KELLY FARRIS, JACKIE PICKRELL, JASON BUNCH, and other unknown officers from the Barbourville Police Department, Knox County Sheriff's Department, and Kentucky State Police, awarding compensatory damages, attorneys' fees, and costs against each Defendant, and punitive damages against each of the individual Defendants, as well as any other relief this Court deems appropriate.

JURY DEMAND

Plaintiffs, JONATHAN TAYLOR AND AMANDA HOSKINS, hereby demands a trial by jury pursuant to Federal Rule of Civil Procedure 38(b) on all issues so triable.

Respectfully submitted,

/s/ Elliot Slosar
One of Plaintiff's Attorneys

Arthur Loevy
Jon Loevy
Michael Kanovitz
Elliot Slosar
LOEVY & LOEVY
311 N. Aberdeen, 3rd Floor
Chicago, IL 60607
(312) 243-5900
Fax: (312) 243-5902