

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JORDAN DAVID COLEMAN,

Plaintiff,

v.

LEWIS COUNTY, ROBERT R. SNAZA,
SAM SCHOUTEN, ANDREW YOCOM,
JONATHAN L. MEYER, JOSEPH BASSETT;
and BRAD DIXON,

Defendants.

Case No.

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff JORDAN DAVID COLEMAN, by and through his attorneys, Loevy & Loevy, complain of Defendants LEWIS COUNTY, Lewis County Sheriff ROBERT R. SNAZA, Lewis County Sheriff's Deputy SAM SCHOUTEN, Lewis County Sheriff's Deputy ANDREW YOCOM, Lewis County Prosecuting Attorney JONATHAN L. MEYER, Lewis County Deputy Prosecuting Attorney JOSEPH BASSETTI, and Washington State Patrol Crime Laboratory Forensic Scientist BRAD DIXON, as follows:

INTRODUCTION

1. Plaintiff Jordan Coleman's life was forever changed when, in 2021, he was wrongfully accused of sexually assaulting a minor.

1 including as at Stafford Creek Corrections Center outside of Aberdeen, and construction work
2 in the community.

3 10. Defendant Lewis County is a Washington municipal corporation, duly
4 incorporated under the laws of the State of Washington. At all times relevant to this complaint,
5 Lewis County was an employer of Andrew Yocom, Sam Schouten, Joseph Bassetti, and
6 Jonathan L. Meyer. At all relevant times, Lewis County was the governing body of the Lewis
7 County Sheriff's Office and, separately, the Lewis County Prosecuting Attorney's Office. Lewis
8 County is liable for all state-law torts committed by Individual Defendants pursuant to the
9 doctrine of *respondeat superior*. Additionally, Lewis County is liable for violations of Plaintiff's
10 rights caused by its own unconstitutional policies, practices, and customs including actions of
11 Individual Defendants taken pursuant to those policies, practices, and customs during their
12 investigation of Plaintiff.

13 11. Defendant Robert R. Snaza was, at all relevant times, the duly elected Lewis
14 County Sheriff. He engaged in the conduct complained of in the course and scope of his
15 employment and under color of law. He is sued in both his individual and official capacities. As
16 the elected Sheriff at the Lewis County Sheriff's Office, Defendant Snaza acted as the chief
17 policymaker with respect to Lewis County and the policies, practices, customs, and actions of
18 the Lewis County Sheriff's Office. Accordingly, his actions reflect both himself and the policy
19 decisions of the County with respect to information sharing and handling procedures.

20 12. Defendant Andrew Yocom was, at all relevant times, a duly appointed Lewis
21 County Deputy Sheriff. He engaged in the conduct complained of in the course and scope of his
22 employment and under color of law. He is sued in his individual capacity.

23 13. Defendant Sam Schouten was, at all relevant times, a duly appointed Lewis
24 County Deputy Sheriff. He engaged in the conduct complained of in the course and scope of his
25 employment and under color of law. He is sued in his individual capacity.

1 20. One niece, M.J.J.M., was born in 2004 and was 15-years old in 2020.

2 21. Coleman learned that M.J.J.M. had an adult boyfriend whose sexual relationship
3 with M.J.J.M. was a crime. Coleman testified for the State of Washington in the initial phases
4 of those criminal proceedings.

5 22. At some point later, M.J.J.M. falsely—and ridiculously—accused Plaintiff of
6 committing heinous crimes of rape and other sexual misconduct against her.

7 23. The allegations were false. Plaintiff never raped, sexually assaulted, or
8 committed any sex crimes against M.J.J.M. whatsoever.

9 24. It would have been obvious to any reasonable investigator that, while serious,
10 the allegations M.J.J.M. made against Coleman were untrue.

11 25. In fact, as the investigation would later confirm, reasonable investigators
12 obtained additional information demonstrating that the allegations M.J.J.M. made, while
13 serious, were false.

14 26. Consistent with his own background in having previously worked for the State
15 at a Correctional facility, and having previously serving as a State's witness trying to *protect*
16 M.J.J.M., Plaintiff also cooperated with the Defendants following the false allegations.

17 27. Coleman, for example, invited Lewis County Sheriff's Deputies, Defendants
18 Schouten and Yocom, into his home and continued to speak with him shortly after the false
19 allegations.
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Criminal Proceedings Against Plaintiff

1 28. Nonetheless, Defendants Schouten and Yocom decided to elevate the false
2 allegation into a false (and fabricated) criminal charge, including from their initial reporting
3 and subsequent investigative steps that showed the allegations made against Coleman were
4 incredible.

5 29. The initial reporting, which included false claims, material omissions, and a
6 materially incomplete record, was used by the Defendants, including Defendant Bassetti, to
7 obtain criminal process against Plaintiff and as the basis for “probable cause.”

8 30. Though there was no probable cause to believe Plaintiff had sexually assaulted
9 M.J.J.M., the Defendants pursued charges against him on the basis of their own false reporting
10 and despite the fact they knew, or should have known, Coleman was innocent.

11 31. Likewise, Defendant Schouten was the “lead” investigator on the case and
12 conducted the investigation in a manner that mislead the truth by turning Coleman’s
13 cooperation with the officers into false allegations and insinuations of guilt.

14 32. Defendant Bassetti, for example, turned Schouten’s flawed reporting as the basis
15 for claiming there was probable cause to arrest and charge Plaintiff with sexual assault.

16 33. Defendant Yocom likewise fabricated statements attributed to Plaintiff that were
17 never made and that mischaracterized what Plaintiff did say when he interacted with the
18 officers.

19 34. Part of Defendant Yocom’s fabrications concerning Coleman pertained to
20 whether there was DNA evidence that would corroborate or disprove the allegations, and
21 whether Coleman had some consciousness of guilt about DNA evidence.

22 35. In truth, there was no DNA evidence that linked Coleman to any sex crime
23 against M.J.J.M. and Coleman did not say anything inculpatory to Defendants Yocom or
24 Schouten when they spoke with him.
25

1 36. Defendants Dixon and Yocom suppressed evidence of their own prior
2 misconduct and related to the alleged DNA evidence which was both exculpatory and which
3 was favorable to Coleman due to the fact it could have impeached them.

4 37. At no time was there probable cause to believe that Plaintiff had sexually
5 assaulted or raped M.J.J.M.

6 38. The Individual Defendants, however, wrote reports and other documents
7 accusing Plaintiff of committing rape and other criminal allegations.

8 39. The Individual Defendants authored other reports that included
9 mischaracterizations, falsehoods, and material omissions that would have been exculpatory to
10 Plaintiff.

11 40. Separately, during the investigation the Defendant Officers learned of
12 information that would have been favorable to Plaintiff but that was not disclosed to Plaintiff,
13 his criminal defense attorney, or even the Lewis County Prosecutor's Office.

14 41. The Individual Defendants wrote their reports knowing they would be used to
15 cause Plaintiff to be charged with rape of a minor and understood those reports would be relied
16 upon by prosecutors and others in the criminal legal system to determine whether Plaintiff
17 would be tried for sexual assault.

18 42. On the basis of the work by the Individual Defendants, Plaintiff was charged
19 with rape and other related crimes he did not commit against M.J.J.M. even though there was
20 no probable cause to support those charges.

21 43. The finding of probable cause was based upon evidence including Defendants'
22 report included falsehoods, misrepresentations, and that omitted material information of
23 Plaintiff's innocence.
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1 44. At the time of arrest and as the prosecution wore on, the Individual Defendants
2 were aware of evidence showing Plaintiff's innocence but continued to pursue charges against
3 him.

4 45. Plaintiff was arrested in March 2021, imprisoned during substantial periods of
5 time until 2023.

6 46. In the interim, being innocent, Plaintiff demanded a trial.

7 47. In addition to relying on information that was false and fabricated, the trial was
8 fundamentally unfair: the Defendants continued to suppress evidence of which they were aware
9 that was exculpatory to Plaintiff and that would have impeached the bogus prosecution,
10 including related to M.J.J.M.'s conduct and statements and the Defendants' themselves.

11 48. Defendants' reporting—and suppressing favorable information to go with it—
12 impacted the criminal proceedings both in commencing the proceedings themselves, in pretrial
13 proceedings, and during the trial itself.

14 49. Each of the Individual Defendants had the opportunity to prevent the ongoing
15 violation of Plaintiff's rights due to the unlawful prosecution against him. Indeed, the
16 prosecution—and the unlawful restriction of Plaintiff's liberty—wore on for years. Yet, none
17 of the Individual Defendants intervened to prevent these ongoing harms.

18 50. Plaintiff was thus wrongfully convicted at trial.

19 51. Fortunately, and despite the misconduct that caused Plaintiff to spend years
20 imprisoned, Plaintiff soon learned of some (though not all) of the favorable information that
21 had been suppressed by the Defendants.

22 52. Given the new evidence, specifically including the suppression of favorable
23 information from Coleman, the wrongful conviction was vacated.

24 53. Plaintiff was released from custody.

25 54. The charges were subsequently dismissed, with prejudice.

1 55. During the time between arrest and conviction, the Defendant Officers were
2 aware of evidence of Plaintiff's innocence but did not disclose it to the prosecutors or to
3 Plaintiff's criminal defense attorneys.

4 56. During the time between arrest and conviction, the Defendants knew they had
5 fabricated evidence, including in their own reports, but failed to disclose those dishonest acts to
6 the prosecutors or to Plaintiff's criminal defense attorneys.

7 57. During the time between arrest and conviction, the Individual Defendants knew
8 they had targeted Plaintiff to conclude and assert that Plaintiff committed rape of a minor when
9 he had not.

10 58. Overall, the evidence suppressed by the Defendants in this case, or pursuant to
11 Lewis County's practices, fatally undermined the fairness of the criminal proceedings.
12 Evidence related to DNA was important but suppressed by Defendant Dixon. Evidence
13 impeaching Defendant Yocom's credibility was important but withheld.

14 **The Policies, Practices, and Customs of Lewis County**

15 59. Both the Lewis County Sheriff's Office and, separately, the Lewis County
16 Prosecutor's Office failed to exercise due care in allowing its agents to seek criminal charges
17 against Plaintiff and do so in violation of his constitutional rights.

18 60. Lewis County had a duty to Plaintiff, and others, but breached that duty in
19 prosecuting Plaintiff.

20 61. For the Sheriff's Office, Lewis County failed to adopt procedural safeguards
21 that would have required the production of *all* favorable information to Coleman and,
22 particularly given the small size of the office and County, its actions in suppressing evidence
23 here were directly due to the conduct of the acts and omissions of Defendant Snaza, making
24 them attributable to the County.
25

1 62. In addition, as it relates to the Lewis County Sheriff's Department, the County
2 has inadequate systems for ensuring officers engage in accurate reporting, in how to question
3 witnesses following traumatic events, and in seeking the truth (and that permitted Plaintiff to be
4 accused). In the absence of adequate procedural safeguards, Plaintiff was wrongfully charged
5 with a crime he did not commit (and that did not occur) due to the County's practices and
6 customs.

7 63. Indeed, though Defendant Schouten, the lead investigator on the case, knew the
8 Lewis County Sheriff's Office had information favorable to Coleman that should have been
9 produced, there was not policy, practice, or requirement that would have prompted him to
10 disclose the information or, reflecting inadequate policies, would have provided a mechanism
11 for all favorable information to be produced to Coleman's defense or even to the prosecutor.

12 64. For the Prosecutor's Office, Lewis County failed to adopt procedural safeguards
13 that would have required the production of *all* favorable information to Coleman and,
14 particularly given the small size of the office and County, its actions in suppressing evidence
15 here were directly due to the conduct of the acts and omissions of Defendant Meyer, making
16 them attributable to the County. Indeed, even after the Prosecutor's Office learned of some
17 suppression along the way it *continued* to suppress evidence, pursuant to its own practices, and
18 with ratification of the County itself, that would have been favorable to Coleman's defense.

19 65. Defendant Meyer, as policymaker for the County concerning the prosecutor's
20 office, was specifically aware of some information that was suppressed but, creating county
21 policy, failed to disclose it to Coleman's defense or adopt policies or practices that would have
22 required its disclosure.

Plaintiff's Profound Damages

66. As a result of Defendants' misconduct, Plaintiff was arrested and charged with a heinous violent rape he did not commit. Plaintiff spent nearly three years battling these charges, including more than two years imprisoned at the Lewis County Jail.

67. In that time, Plaintiff's life was truly upended. He was kept isolated in his cell for 23-hours a day for much of that time; his health deteriorated; he gained weight; and began to suffer other negative health issues like high blood pressure and asthma.

68. Coleman lost a life he had built for himself and many personal relationships were severely strained, if not broken. Plaintiff's parents suffered from the false criminal charges and Plaintiff suffered seeing his parents put through dire straits. Other loved ones and family members were turned against Coleman as a result of the bogus criminal charges, conviction, and stain he suffered.

69. Coleman's damages were particularly acute given that Pe Ell is a small community and the reputational harm he suffered from being wrongfully convicted of rape, which was reported in news outlets, continues to this day. Indeed, while news outlets reported on Coleman being charged; they did not provide the same coverage of Coleman's exoneration.

70. Defendants' actions caused Plaintiff the severe trauma of wrongful imprisonment and the stress of charges hanging over his head for years, the loss of his liberty, actual physical harm and pain, and reputational harm.

71. Defendants' misconduct continues to cause Plaintiff physical and psychological pain and suffering, humiliation, fear, nightmares, anxiety, depression, and despair, rage, and other physical and psychological effects, and he has suffered emotional harm and great anguish, including PTSD, which continues to this day.

LEGAL CLAIMS

COUNT I

42 U.S.C. § 1983 – Fourteenth Amendment Violation

72. Plaintiff hereby repeats, realleges, and incorporates by reference each paragraph of this complaint, as though fully set forth herein.

73. In the manner described more fully above, the Individual Defendants acted individually, jointly, and in conspiracy with each other, deprived Plaintiff of his constitutional right to due process and his right to a fair trial.

74. In the manner described more fully above, the Individual Defendants failed to disclose, and otherwise withheld and/or suppressed exculpatory information and material from the prosecution, Plaintiff, and Plaintiff's defense counsel during the criminal proceedings, including: their own misconduct in coercing and fabricating evidence and testimony; that they had fabricated information through mischaracterizations and material omissions in police reports, probable cause documents, and elsewhere; evidence related to the prior misconduct of Defendants Dixon and Yocom; inconsistent statements and actions of M.J.J.M. and other witnesses; and documents showing the allegations made against Coleman were false (and the motive for making a false allegation).

75. The Individual Defendants knew there was no credible evidence that Plaintiff committed sexual assault, even as Plaintiff sat imprisoned in the Lewis County jail and subject to criminal charges. Had they disclosed this exculpatory evidence, which would have shown no sexual assault was committed (and proved Plaintiff's innocence), it would have cast doubt on the entire police investigation and ongoing prosecution, and either precluded it entirely or ended Plaintiff's detention and prosecution.

76. In addition, on information and belief, the Individual Defendants concealed and fabricated additional evidence that is not yet known to Plaintiff.

1 77. The Individual Defendants performed the above-described acts under the color
2 of state law and within the scope of their employment when they took those actions,
3 deliberately, intentionally, with malice or reckless disregard for the truth and of Plaintiff's
4 rights and with deliberate indifference to Plaintiff's clearly established constitutional rights.

5 78. As a result of the misconduct of the Individual Defendants, Plaintiff suffered
6 loss of liberty, great mental anguish, humiliation, degradation, physical and emotional pain and
7 suffering, and other grievous and continuing injuries and damages.

8 79. In the manner described more fully below, the misconduct described in this
9 count was undertaken pursuant to the policies and practices of Defendant Lewis County.

10 **COUNT II**

11 **42 U.S.C. § 1983 – Fourth Amendment Violation: 12 Prosecution and Detention Without Probable Cause**

13 80. Plaintiff hereby repeats, realleges, and incorporates by reference each paragraph
14 of the complaint, as though fully set forth herein.

15 81. In the manner described more fully above, the Individual Defendants,
16 individually, jointly, and in conspiracy with each other, as well as under color of law and
17 within the scope of their employment, accused Plaintiff of criminal activity and exerted
18 influence to initiate, continue, and perpetuate judicial proceedings against Plaintiff without any
19 probable cause for doing so and in spite of the fact that they knew Plaintiff was innocent, in
20 violation of his rights secured by the Fourth Amendment (made applicable to Defendants via
21 the Fourteenth Amendment).

22 82. In so doing, the Individual Defendants caused Plaintiff to be deprived of his
23 liberty and detained without probable cause and subjected improperly to judicial proceedings
24 for which there was no probable cause. Plaintiff was deprived of his liberty, after the issuance
25 of legal process, based upon Defendants' false and/or misleading documents and statements.

1 grievous and continuing injuries and damages as set forth above.

2 92. In the manner described more fully above, the misconduct described in this
3 count was undertaken pursuant to the policies and practices of Defendant Lewis County.

4 **COUNT IV**
5 **42 U.S.C. § 1983 – Conspiracy**

6 93. Plaintiff incorporates each paragraph of this complaint as if restated fully herein.

7 94. The Individual Defendants reached an agreement among themselves to arrest,
8 charge and prosecute Plaintiff for committing a sexual assault that he did not commit (and that
9 did not happen), and thereby to deprive Plaintiff of his constitutional rights, as described above.
10 This agreement was first reached before arresting Plaintiff, expanded to others, and it remained
11 in place throughout all periods of his wrongful detention, prosecution, conviction, and
12 incarceration.

13 95. In addition, the Individual Defendants agreed before Plaintiff's arrest, and
14 continued to conspire after he was charged and through various phases of his criminal
15 prosecution to deprive Plaintiff of exculpatory material to which he is entitled and that would
16 have led to his earlier release and exoneration. Indeed, this conspiracy continued even after
17 Plaintiff was wrongfully convicted at trial.

18 96. In this manner, the Individual Defendants, acting in concert with each other and
19 with other co-conspirators, known and unknown, conspired by concerted action to accomplish
20 an unlawful purpose and/or a lawful purpose by unlawful means.

21 97. In furtherance of the conspiracy, each co-conspirator committed overt acts and
22 was an otherwise willful participant in joint activity.

23 98. As a result of this illicit prior agreement, Plaintiff suffered loss of liberty, great
24
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1 mental anguish, humiliation, degradation, physical and emotional pain and suffering, and other
2 grievous and continuing injuries and damages as set forth above.

3 99. The misconduct described in this count was objectively unreasonable and was
4 undertaken intentionally and with willful indifference to Plaintiff's constitutional rights.

5 100. In the manner described more fully above, the misconduct described in this
6 count was undertaken pursuant to the policies and practices of Defendant Lewis County.

7 **COUNT V**
8 **42 U.S.C. § 1983 – *Monell* Claim**

9 101. Plaintiff hereby repeats, realleges, and incorporates by reference each paragraph
10 of the Plaintiff incorporates each paragraph of this complaint as if fully restated herein.

11 102. Plaintiff's injuries described in this complaint and the violations of his
12 constitutional rights discussed above were caused by the policies and customs of Lewis County,
13 as well as by the actions of policy-making officials for Lewis County with respect to both—and
14 separately—the Lewis County Prosecutor's Office and the Lewis County Sheriff's Office.

15 103. At all times relevant to the events described in this complaint and for a period of
16 time before and after, and pertaining to the Sheriff's Office, Lewis County failed to promulgate
17 proper or adequate rules, regulations, policies, and procedures governing: the collection,
18 documentation, preservation, testing, and disclosure of evidence, including physical evidence,
19 material exculpatory evidence and impeachment evidence, and information bearing upon the
20 credibility of both lay and law-enforcement witnesses; writing of police reports and taking of
21 investigative notes; obtaining statements and testimony from witnesses; honest and accurate
22 reporting; and the maintenance of investigative files and disclosure of those files in criminal
23 proceedings. In addition, or alternatively, Lewis County failed to promulgate proper and
24 adequate rules, regulations, policies, procedural safeguards, and procedures for the training and
25

1 supervision of sheriff deputies and other agents of the Lewis County Sheriff's Department as to
2 the same topics.

3 104. At all times relevant to the events described in this complaint and for a period of
4 time before and after, and pertaining to the Prosecutor's Office, Lewis County failed to
5 promulgate proper or adequate rules, regulations, policies, and procedures governing:
6 disclosure of evidence, including physical evidence, material exculpatory evidence and
7 impeachment evidence, and information bearing upon the credibility of both lay and law-
8 enforcement witnesses and the maintenance of investigative files and disclosure of those files
9 in criminal proceedings. In addition, or alternatively, Lewis County failed to promulgate proper
10 and adequate rules, regulations, policies, procedural safeguards, and procedures for the training
11 and supervision of deputy prosecutors and other agents of the Lewis County Prosecutor's
12 Office as to the same topics.
13

14 105. Had Lewis County promulgated and enforced appropriate policies and practices,
15 then the violation of Plaintiff's constitutional rights would have been prevented.

16 106. These practices and customs, individually and/or together, were allowed to
17 flourish because the leaders, supervisors, and policymakers of Lewis County—in their
18 respective areas—directly encouraged and were thereby the moving force behind the very type
19 of misconduct at issue by failing to adequately train, supervise, and control their officers,
20 agents, and employees on proper interrogation techniques and by failing to adequately punish
21 and discipline prior instances of similar misconduct, thus directly encouraging future abuses
22 like those affecting Plaintiff.
23

24 107. The above practices and customs, so well settled as to constitute *de facto*
25 policies of Lewis County, were able to exist and thrive, individually and/or together, because

1 policymakers with authority over the same exhibited deliberate indifference to the problem,
2 thereby effectively ratifying it.

3 108. In addition, the misconduct described in this count was undertaken pursuant to
4 Lewis County' policies and practices in that the constitutional violations committed against
5 Plaintiff were committed with the knowledge, approval, or endorsement of persons with final
6 policymaking authority for Lewis County, in the appropriate and respective department, or
7 were actually committed by persons with such final policymaking authority.

8 109. As a consequence, the final policy makers for Lewis County approved of,
9 adopted, and therefore ratified the actions of the Individual Defendants, including their
10 violations of Plaintiff's constitutional rights, making the County liable for this misconduct.

11 110. Plaintiff's injuries and the constitutional violations he suffered were caused by
12 officers, agents, and employees of Lewis County, including but not limited to the Individual
13 Defendants, who acted pursuant to one or more of the policies, practices, and customs set forth
14 above in engaging in the misconduct described in this count.
15

16 **COUNT VI— State Law**
17 **Malicious Prosecution**

18 111. Each paragraph of this Complaint is incorporated as if reinstated fully herein.

19 112. The Individual Defendants accused Plaintiff of criminal activity knowing those
20 accusations were not supported by genuine probable cause, and they made statements to
21 prosecutors with the intent of exerting influence and to institute and continue the judicial
22 proceedings.

23 113. The Individual Defendants caused Plaintiff to be improperly subjected to criminal
24 judicial proceedings for which there was no probable cause. These judicial proceedings were
25 instituted and continued maliciously, resulting in injury.

1 114. The Defendants' statements alleging that Plaintiff was guilty of raping a teenager
2 were made with knowledge that those statements were false. The Defendants also fabricated
3 evidence in the form of falsified police reports, autopsy reports, and by how they interacted with
4 witnesses. The Defendants were aware, as described more fully above, that no true or reliable
5 evidence implicated Plaintiff in having committed a homicide.

6 115. In 2023, the prosecution terminated in Plaintiff's favor when the charges were
7 dismissed with prejudice.

8 116. The misconduct described in this Count was objectively unreasonable and was
9 undertaken intentionally, with malice, with reckless indifference to the rights of others, and in
10 total disregard of the truth and Plaintiff's innocence.

11 117. As a result of Defendants' misconduct described in this Count, Plaintiff suffered
12 injuries, including but not limited to loss of liberty and emotional distress.

13 **Count VII – State Law**
14 **Outrage**

15 118. Each paragraph of this Complaint is incorporated as if reinstated fully herein.

16 119. The acts and conduct of the Defendants as set forth above were extreme and
17 outrageous. As more fully described above, the Defendants' actions were rooted in an abuse of
18 power and authority, and they were undertaken with intent to cause, or with reckless disregard
19 for the probability that their conduct would cause, severe emotional distress to Plaintiff.

20 120. The Defendants' conduct was so outrageous in character and extreme in degree
21 that they went beyond all possible bounds of decency and are intolerable in a civilized
22 community.

23 121. Defendants undertook this extreme and outrageous conduct intentionally and/or
24 with reckless disregard for Plaintiff's emotional well-being.

25 122. As a direct and proximate result of the Defendants' actions, Plaintiff suffered and
continues to suffer severe emotional distress.

Count VIII – State Law
Civil Conspiracy

123. Each paragraph of this Complaint is incorporated as if reinstated fully herein.

124. As described more fully above, the Individual Defendants, acting in concert, conspired by concerted action to accomplish an unlawful purpose by unlawful means.

125. In furtherance of the conspiracy, the Defendants committed overt acts and were otherwise willful participants in joint activity including but not limited to the malicious prosecution of Plaintiff and the intentional infliction of emotional distress upon him.

126. The misconduct described in this Count was undertaken intentionally, with malice, willfulness, and reckless indifference to Plaintiff's rights.

127. As a direct and proximate result of the Defendants' conspiracy, Plaintiff suffered injuries, including but not limited to loss of liberty and emotional distress.

Count IX – State Law
Respondeat Superior

128. Each paragraph of this Complaint is incorporated as if reinstated fully herein.

129. In committing the acts alleged in the preceding paragraphs, each of the Individual Defendants were members of, and agents of, the Lewis County, acting at all relevant times within the scope of their employment and under color of law.

130. Defendants Lewis County are liable as principals for all torts committed by their agents under Washington law as set forth in the state-law Counts above.

Count X - State Law
Negligence

131. Each paragraph of this Complaint is incorporated as if reinstated fully herein.

132. Lewis County owed a duty to Plaintiff to exercise reasonable care to refrain from causing him foreseeable harm. This included a duty to ensure their officers refrain from directly causing harm to Plaintiff through affirmative acts of misfeasance. Specifically, the Defendants owed Plaintiff a duty not to fabricate evidence, to avoid producing false allegations that would

1 be used against Plaintiff in criminal proceedings, and to produce favorable information to the
2 accused. The Defendants also had a duty to ensure that adequate training and supervision was
3 taken to prevent harm from Plaintiff.

4 133. Lewis County breached its duty to Plaintiff by failing to adopt safeguards, by
5 failing to adequately train and supervise their Sheriff's deputies, and as otherwise described
6 above.

7 134. But for the negligence of Lewis County, Plaintiff would not have been detained,
8 charged, prosecuted, and wrongfully imprisoned for a rape resulting from M.J.J.M.'s false
9 allegation.

10 135. Lewis County knew or reasonably should have known that the injuries Plaintiff
11 suffered would result from the negligence described herein, which are obvious consequences that
12 flow from the un-regulated and misguided work of Sheriff's deputies and deputy prosecutors.
13 Plaintiff's wrongful prosecution and incarceration were within the field the danger which Lewis
County should have anticipated.

14 136. As a result of Defendants' misconduct described in this Count, Plaintiff suffered
15 injuries, including but not limited to loss of liberty and emotional distress.

16 **Count XI– State Law**
17 **Indemnification**

18 137. Each paragraph of this Complaint is incorporated as if reinstated fully herein.

19 138. In committing the acts alleged in the preceding paragraphs, the Individual
20 Defendants acted at all relevant times within the scope of their employment for Lewis County.

21 139. As a result, pursuant to state law, Lewis County must indemnify the Individual
22 Defendants for any judgment against them.

23 WHEREFORE, Plaintiff JORDAN DAVID COLEMAN respectfully requests that this
24 Court enter a judgement in their favor and against LEWIS COUNTY, Lewis County Sheriff
25 ROBERT R. SNAZA, Lewis County Sheriff's Deputy SAM SCHOUTEN, Lewis County

1 Sheriff's Deputy ANDREW YOCOM, Lewis County Prosecuting Attorney JONATHAN L.
2 MEYER, Lewis County Deputy Prosecuting Attorney JOSEPH BASSETTI, and Washington
3 State Patrol Crime Laboratory Forensic Scientist BRAD DIXON, awarding compensatory
4 damages, attorneys' fees and costs against each Defendant, and, because they acted willfully,
5 wantonly, and/or maliciously, punitive damages against each of the Individual Defendants, and
6 any other relief this Court deems just and appropriate, including but not limited to injunctive
7 and equitable relief against the Lewis County.

8 **JURY DEMAND**

9 Plaintiff, JORDAN DAVID COLEMAN, hereby demands a trial by jury pursuant to
10 Federal Rules of Civil Procedure 38(b) on all issues so triable.

11 Dated: September 18, 2026

12 Respectfully submitted,
13

14 **JORDAN COLEMAN**

15 By: /s/ David B. Owens
16

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