

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

MARCOS MARTINEZ and)
STEPHANIE MARTINEZ, on behalf of)
herself and her minor children, A.M.M.,)
A.I.M., and E.A.M.,)

Plaintiffs;)

v.)

HANCOCK COUNTY, MISSISSIPPI,)
MILTON ARIC LATSCHAR, in his)
individual capacity, ABE LONG, in his)

CIV. A. NO. 1:18-cv-354-HSO-JCG

DEMAND FOR JURY TRIAL

belonging to Plaintiffs and other occupants of their vehicle, threatened Marcos Martinez with the loss of his lawful permanent residency, made baseless accusations that the family was engaged in criminal activity, and conducted an invasive search of the family's belongings—all because he perceived the family to be Latino and of Mexican descent.

3. For approximately two hours, Defendant Latschar detained Plaintiffs by the side of Interstate 10 while he interrogated them, threatened them, searched their belongings, and inspected their vehicle. Although no evidence of illegal activity was found, Defendant Latschar and other HCSO officers then transported Plaintiffs to the HCSO, where deputies detained them for approximately two more hours and again searched their vehicle.

4. After witnessing her family members cry over the course of several hours, Stephanie Martinez called 9-1-1 from inside the HCSO and demanded her family's release. The family's lawyer also called the HCSO, challenged the legality of the family's detention and demanded their release. Only then did HCSO deputies release the Martinez family and return the passports, residency cards, and immigration documents that Defendant Latschar had confiscated.

5. No evidence of illegal activity was ever found, and none of the Plaintiffs or the other occupants of their vehicle was charged with a crime or even given a traffic ticket. The HCSO deputies never had any reason to believe that the Plaintiffs or other occupants of their vehicle had done something illegal, or that the vehicle contained any evidence of criminal activity.

6. Defendant Latschar's actions were based on a racist assumption that any Latino person must be either undocumented or a criminal or both. By interrogating Plaintiffs about their immigration status and confiscating the passports, residency cards, and immigration documents of everyone in Plaintiffs' vehicle, Defendant Latschar attempted to act as an immigration agent,

though he had no authority to do so. The HCSO has no agreement with the federal government giving the HCSO authority to enforce federal immigration law.

7. Regardless, all occupants of the family's vehicle had lawful status. Marcos Martinez, who was born in Mexico, was a lawful permanent resident of the United States on June 3, 2017. Stephanie Martinez and their three children were and are U.S. citizens. Other occupants of the vehicle, a friend and relatives of the Martinez family, were Mexican citizens who were lawfully in the United States on the day of the detention. Marcos Martinez has since become a U.S. citizen.

8. Plaintiffs' experience is an example of pervasive r

Defendants. The family also lost trust in law enforcement officers following this harrowing incident.

11. This action is brought pursuant to 42 U.S.C. § 1983 for the violation of Plaintiffs' rights under the Fourth and Fourteenth Amendments to the U.S. Constitution. This action is also brought under the laws of the State of Mississippi, including the Mississippi Tort Claims Act, Miss. Code § 11-46-1 *et seq.*, for the state torts of false arrest and false imprisonment.

JURISDICTION AND VENUE

12. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 because this case arises under the U.S. Constitution and laws of the United States; and pursuant to 28 U.S.C. § 1343 because this action seeks to redress the deprivation, under color of state law, of Plaintiffs' civil rights, and to recover damages for the violation of those rights. The Court may exercise supplemental jurisdiction over Plaintiffs' state law claims. *See* 28 U.S.C. § 1367(a).

13. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims occurred in this district.

JURY DEMAND

14. Plaintiffs demand a jury trial on all claims except the claims of false arrest and false imprisonment, for which they request a bench trial as required by the Mississippi Tort Claims Act. Miss. Code § 11-46-13(1).

PARTIES

Plaintiffs

15. Plaintiff Stephanie Martinez is a resident of Taylors, South Carolina. She is married to Marcos Martinez and is the mother of A.M.M., A.I.M, and E.A.M., who also reside in

Taylors, South Carolina. Stephanie Martinez brings this action on her own behalf and on behalf of A.M.M., A.I.M., and E.A.M., who are minor childr

being of each of the Plaintiffs, who were not engaged in criminal activity at the time of any of the injuries alleged in this Complaint. Defendant Long is subject to the personal jurisdiction of this Court.

20. William Covington, sued in his individual capacity, is a lieutenant employed by the Hancock County Sheriff's Office in Hancock County, Mississippi. At all times relevant to this Complaint, Defendant Covington was acting within the course and scope of his employment and under color of law. His actions, as set forth in this Complaint, were in reckless disregard of the safety and well-being of each of the Plaintiffs, who were not engaged in criminal activity at the time of any of the injuries alleged in this Complaint. Defendant Covington is subject to the personal jurisdiction of this Court.

21. Reginald Fowler, sued in his individual capacity, is a deputy employed by the Hancock County Sheriff's Office in Hancock County, Mississippi. At all times relevant to this

United States. The Martinez children had recently finished the school year in Taylors and were beginning their summer break.

23. Mr. Martinez, a licensed South Carolina driver, was driving the family's van. The van bore a South Carolina license plate and an up-to-date registration sticker. Ms. Martinez was in the passenger seat. The other passengers in the van were the Martinez children; Mr. Martinez's mother, Maria Aguilar Nieto, then 83 years old; Mr. Martinez's sister, Gloria Martinez Aguilar; and a friend of the family, Ismael Guijon Rodriguez.

24. Ms. Aguilar Nieto and Ms. Martinez Aguilar had been visiting the Martinez family in South Carolina on tourist visas, and one purpose of the trip to Mexico was to bring them home before the expiration of their visas. Mr. Guijon Rodriguez lives in South Carolina and he rode with the family to visit his relatives in Mexico.

25. A.M.M., A.I.M., and E.A.M. are United States citizens of Mexican and Native American descent. They are and appear to be Latino. Ms. Martinez is a U.S. citizen with Cherokee ancestry. Ms. Martinez has been mistaken for being Latina because of her appearance and her association with Mr. Martinez and their children.

26. Mr. Martinez, who was born in Guanajuato, Mexico, was a lawful permanent

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Ms. Martinez and the Martinez children were United States citizens, that Mr. Martinez and the family friend, Mr. Guijon Rodriguez, were lawful permanent residents of the United States, and the two other women (Mr. Martinez's mother and his sister) were in the United States on valid tourist visas.

35. Defendant Latschar demanded that Plaintiffs produce the immigration documents and/or passports of each of the van's occupants. Defendant Latschar asked Plaintiffs for passports and immigration documents solely because he perceived the occupants of the vehicle to be Latino and non-U.S. citizens.

36. Defendant Latschar took Ms. Martinez's passport, the Martinez children's passports, Mr. Martinez's residency card and driver

39. There was no basis to suspect that any of the Plaintiffs or the other occupants of the van were not lawfully present in the United States; indeed, Defendant Latschar held in his hands documents that proved they were lawfully present.

40.

smuggling drugs. Mr. Martinez said he was not smuggling drugs and that there were no drugs in the van.

45. Defendant Latschar threatened to take away Mr. Mart

50. By the time Defendant Latschar asked Ms. Martinez for permission to search the van, approximately 20 minutes, at least, had elapsed since Defendant Latschar's computer checks came back clean.

51. Defendant Latschar never informed Ms. Martinez that she had the right to refuse consent to the search. Ms. Martinez believed she could not refuse consent to search the van. At this time, Defendant Latschar was still in possession of Mr. Martinez's residency card, the passports of Ms. Martinez and the Martinez children, and the immigration documents of the other occupants of the van. Federal law requires lawful permanent residents such as Mr. Martinez to carry their original residency cards with them at all times. 8 U.S.C. § 1304(e). Failure to do so is a crime.

52. With Defendant Latschar in possession of these important documents, Plaintiffs were not free to leave the scene and Ms. Martinez did not feel free to refuse the search.

53. When Defendant Latschar sought Ms. Martinez's consent to search the van, Plaintiffs were unlawfully detained. Defendant Latschar had no reasonable suspicion or probable cause to believe that unlawful activity had occurred or would occur in the future in connection with any of the vehicle's occupants.

54. After Defendant Latschar's computer checks came back clean, and certainly by the time he sought Ms. Martinez's consent to search the van, Plaintiffs' detention had become a de facto arrest.

55. Defendant Latschar did not seek or obtain consent to search the van or its contents from any of the Martinez children, Mr. Guijon Rodriguez, or Mr. Martinez's mother or sister.

56. There were several bags and suitcases in the trunk of the Martinez family's van, and Defendant Latschar opened and searched all or most of them. Defendant Latschar emptied

the contents of those bags and suitcases and left the family's belongings, including many highly personal items, strewn all over the trunk of the van. During his search, Defendant Latschar irreparably damaged a treasured painting which Mr. Martinez's mother had received as a gift.

57. Defendant Latschar found no drugs or any evidence of illegality during his search of the van and its contents.

58. Following his extensive search of the van and the Martinez family's belongings, Defendant Latschar returned to the driver-side window and directed Mr. Martinez to exit the van again. Mr. Martinez again complied with this command and was escorted by Defendant Latschar to the back of the van, in front of Defendant Latschar's vehicle. Defendant Latschar again accused Mr. Martinez of smuggling drugs and asked Mr. Martinez where he was hiding drugs. Mr. Martinez again said he did not have any drugs. Defendant Latschar escorted Mr. Martinez back to the van.

59. Defendant Latschar then knelt down and looked at the undercarriage of the van. At this point, the family had been detained by the side of I-10 for at least one hour.

60. Defendant Latschar took photographs of parts of the undercarriage of the Martinez family's van. Defendant Latschar then told Mr. Martinez that he thought someone had done shoddy work on the drive shaft of the vehicle, and that it appeared to be newer than the year of the van's manufacture. Defendant Latschar accused Mr. Martinez of hiding money and repeated that if Mr. Martinez cooperated, there would be fewer criminal penalties and he would not lose his residency.

61. Defendant Latschar returned to the passenger-side window and directed Ms. Martinez to exit the van again. Defendant Latschar told Ms. Martinez that he believed the drive shaft had been modified by someone who was not a professional. Ms. Martinez said that her

family had not modified the drive shaft, and that she had no knowledge of any such modifications.

62. Defendant Latschar told Ms. Martinez that if she told him “the truth,” she would not go to jail and she would not have to figure out what to do with her children. Ms. Martinez began to cry after Defendant Latschar threatened to separate her from her children.

63. A.I.M.’s cries continued and Ms. Martinez asked Defendant Latschar if they

73. Defendant Latschar told Mr. Martinez that he and the family were required to go with Defendants Latschar and Long to the HCSO. Defendant Latschar ordered Mr. Martinez to follow Defendant Latschar's vehicle. Defendant Latschar pulled his vehicle in front of the Martinez family's van and Defendant Long pulled his vehicle behind the van to ensure that the Martinez family would be forced to follow Defendant Latschar's car. Defendants Long and Latschar then escorted the Martinez family to the HCSO.

74. Mr. Martinez drove the van behind Defendant Latschar to the HCSO under duress. During this time, Defendant Latschar maintained possession of Mr. Martinez's permanent residency card, Ms. Martinez's passport, the passports belonging to the Martinez children, and the immigration documents of the other occupants of the van. Defendant Latschar had also repeatedly threatened the Martinez family with severe legal consequences, including jail, separation of Ms. Martinez from her children, and stripping Mr. Martinez of his legal permanent residency, if they did not cooperate or agree to Defendant Latschar's version of the truth. Mr. Martinez and Ms. Martinez reasonably believed that if they refused to follow Defendants Latschar and Long to the HCSO, these Defendants would have used force to require them to travel to the HCSO.

75. At this point, and at all times during the events described in this Complaint, no warrant existed for the arrest of any of the Plaintiffs or any other occupant of the Martinez family's vehicle.

76. At this point, and at all times during the events described in this Complaint, no reasonable suspicion or probable cause existed for the detention of any of the Plaintiffs or any other occupant of the Martinez family's vehicle.

77. At this point, and at all times during the events described in this Complaint, no warrant or probable cause existed for the search of the Martinez family's vehicle.

78. The drive to the HCSO lasted between 10 and 20 minutes. During that drive, Ms. Martinez contacted the family's immigration lawyer, Rachel Efron Sharma, to say that the family was being taken to the HCSO.

79. During the drive to the HCSO, A.I.M. continued to cry.

Detention at the Hancock County Sheriff's Office

80. Mr. Martinez drove behind Defendant Latschar's vehicle as Defendant Latschar entered the back of the HCSO building into an area surrounded by a fence. Defendant Latschar drove through a gate into the fenced-in area, and Mr. Martinez followed.

81. After entering the fenced-in area, Defendant Latschar instructed Hancock County Sheriff's Deputy Reginald Fowler to take all of the occupants of the van, except Mr. Martinez, to a room inside the HCSO building.

82. Defendant Fowler, who wore an officer uniform, escorted Ms. Martinez, the Martinez children, Mr. Martinez's mother and sister, and Mr. Guijon Rodriguez down a hallway. Defendant Fowler unlocked the door to a room and escorted them inside. Defendant Fowler told the Martinez family to stay in the room. Then Defendant Fowler left the room and locked the door.

83. Ms. Martinez believed that if she refused to follow Defendant Fowler to the room, Defendant Fowler and other HCSO deputies would use force to continue detaining Plaintiffs.

84. Ms. Martinez attempted to open the door through which they had entered and found it to be locked.

85. While detained in the room, A.I.M. continued to cry and pace around the room and stated that he wanted to leave. Mr. Martinez's mother and E.A.M. also began to cry. Ms. Martinez tried to comfort her family even though she was also worried about what would happen to them and to her husband.

86. While the Martinez family was being detained at the HCSO, Ms. Effron Sharma

90. Defendant Latschar directed Mr. Martinez to drive i

96. Hancock County Sheriff's deputies placed the Martinez family's van on lifts, and a man in a uniform inspected the undercarriage of the van while Defendant Latschar shined a flashlight at the van's undercarriage.

97. The HCSO concluded that the drive shaft on the Martinez family's van had not been tampered with.

98. After the van was lowered back to the ground, Defendant Latschar approached the HCSO vehicle where Mr. Martinez was detained. Defendant Latschar opened the vehicle door near Mr. Martinez and told him that he was free to leave.

99. Prior to that moment, no one had told Mr. Martinez

105. Defendants' conduct involved reckless or callous indifference to Plaintiffs' federally protected rights, as outlined below.

Discrimination by Defendant Latschar

106. Upon information and belief, Defendant Latschar subjected Plaintiffs to a lengthy detention, questioned them extensively, searched their belongings, and caused them to be transported to the HCSO for further detention and an additional search because he perceived Plaintiffs to be Latino and of Mexican descent.

107. Caucasian motorists whom Defendant Latschar stopped during this time period, and who were otherwise similarly situated to Plaintiffs, were not subject to detentions as lengthy and invasive as that to which Defendant Latschar subjected Plaintiffs.

108. During the morning of June 3, 2017, Defendant Latschar stopped two Caucasian motorists, who were travelling on Interstate 10, for the same purported reason he stopped Mr. Martinez—careless driving. In each of those stops of Caucasian motorists, the stop lasted less than 15 minutes. These motorists were similarly situated to Plaintiffs.

109. Based on records produced by Hancock County reflecting stops that were reported to the HCSO dispatch system, Defendant Latschar initiated or was involved in 320 stops of motorists on or near Interstate 10 in Hancock County, Mississippi between June 4, 2016 and September 30, 2017.

110. Even though the populations of Mississippi and the neighboring states of Louisiana, Alabama, Georgia and South Carolina range from 3.2% Latino or Hispanic (Mississippi) to 9.6% Latino or Hispanic (Georgia),⁴ approximately 19% of the motorists whom

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Defendant Latschar that Ms. Martinez would be separated from her children if she did not agree with his allegations that the family was engaged in criminal conduct.

120. Following the June 3, 2017 incident, the entire family has become fearful and mistrustful of law enforcement. The Martinez children have experienced increased anxiety and fear when traveling. They have expressed fear that their father could be deported by law enforcement officers.

121. Since June 3, 2017, Ms. Martinez worries frequently that her husband's permanent residency could be at risk as the result of another abuse of authority by law enforcement. Ms. Martinez has lost her peace of mind as well as her trust in law enforcement.

122. All of the damages alleged in this Complaint are the result of the Defendants' unlawful actions.

Notice of Claim Under the Mississippi Tort Claims Act

123. Pursuant to the Mississippi Tort Claims Act, Plaintiffs have filed a notice of claim with Hancock County Chancery Clerk Timothy Kellar. Miss. Code § 11-46-11. The notice of claim was delivered to the Chancery Clerk by certified U.S. mail on May 22, 2018. No response has been received and more than 95 days have elapsed since the delivery of this notice of claim. Miss. Code § 11-46-11(3)(a)–(b).

CLAIMS FOR RELIEF (i) 17.489166769od c .5106(t)-22.5882(h)()65(a)

Count I
Fourth and Fourteenth Amendments to the U.S. Constitution—
Unreasonable Seizure in Stopping Plaintiffs' Vehicle
(42 U.S.C. § 1983)
On Behalf of All Plaintiffs Against Defendant Milton Aric Latschar

125. When Defendant Latschar activated his lights and pulled the Martinez family's van over to the side of I-10, he seized Plaintiffs

130. At no point during this roadside detention did Defendant Latschar have objectively reasonable suspicion to believe that illegal activity had occurred or was about to occur, and it was unreasonable to believe such suspicion existed.

131. At no point during this roadside detention did Defendant Latschar have probable cause to believe that a criminal offense had been or was being committed, and it was unreasonable to believe that such probable cause existed.

132. Plaintiffs' detention on the side of I-10 was not reasonably related in scope to the circumstances that police records claim justified the stop in the first place. Most of this detention occurred after Defendant Latschar's computer checks came back clean and reflected no legal violations in connection with the Martinez family's vehicle or its occupants.

133. The investigative methods employed by Defendant Latschar were not the least intrusive means reasonably available to verify or dispel any suspicions he had in a short period of time.

134. When Defendant Latschar continued to detain Plaintiffs after the computer checks came back clean, Plaintiffs' detention became a de facto arrest.

135. Defendant Latschar's detention of Plaintiffs by the side of I-10 without reasonable suspicion or probable cause violated Plaintiffs' clearly-established rights under the Fourth and Fourteenth Amendments to the United States Constitution.

Count III

evidence of illegal conduct, as set forth in paragr

143. At no point during Defendant Long's detention of Plaintiffs by the side of I-10 did he have probable cause to believe that a criminal offense had been or was being committed, and it was unreasonable to believe that such probable cause existed.

144. Defendant Long's detention of Plaintiffs on the sid

cause to believe the Martinez family's vehicle contained evidence of illegality. It was unreasonable to believe such reasonable suspicion or probable cause existed.

149. At all times during Plaintiffs' detention en route to and at the HCSO, there was no objectively reasonable suspicion or probable cause to believe that an offense had been or was being committed, or any probable cause to believe the Martinez family's vehicle contained any evidence of illegality. It was unreasonable to believe such reasonable suspicion or probable cause existed.

150. No warrant was ever issued for the arrest of any of the Plaintiffs or other occupant of Plaintiffs' vehicle, and no warrant was ever issued for the search of Plaintiffs' vehicle.

151. Defendants neither sought nor obtained consent from Plaintiffs to transport them and their vehicle to the HCSO, or to conduct a second search of their vehicle.

152. The actions of Defendants Latschar, Long and Covington in causing the transportation of Plaintiffs to the HCSO and their detention at the HCSO violated Plaintiffs' clearly-established rights under the Fourth and Fourteenth Amendments to the United States Constitution.

Count VI
Fourth and Fourteenth Amendments to the U.S. Constitution—
Unreasonable Seizure/False Arrest in Detaining Plaintiffs at the HCSO
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to believe the Martinez family's vehicle contained evidence of illegality. It was not reasonable for Defendant Fowler to believe that reasonable suspicion or probable cause existed for Mr. Martinez's detention.

160. Defendant Fowler's actions in causing Mr. Martinez's seizure and detention at the HCSO violated Mr. Martinez's clearly-established rights under the Fourth and Fourteenth Amendments to the United States Constitution.

Count VIII
Fourteenth Amendment to the U.S. Constitution—Equal Protection Clause
(42 U.S.C. § 1983)
On Behalf of All Plaintiffs Against Defendant Milton Aric Latschar

161. As Latino persons of Mexican descent, Mr. Martinez, A.I.M., E.A.M., and A.M.M. are members of a protected class. Ms. Martinez, as a person of Native American descent, is also a member of a protected class. Defendant Latschar mistakenly believed that Ms. Martinez was Latina and of Mexican descent.

162. As set forth in paragraphs 22 through 115, Defendant Latschar purposefully discriminated against Mr. Martinez, A.I.M., E.A.M., and A.M.M. based on their race, color, national origin, and ethnicity, and he purposefully discriminated against Ms. Martinez based on his perception of her race, color, national origin, and ethnicity and her association with Mr. Martinez and their children.

163. As set forth in paragraphs 22 through 115, Defendant Latschar detained, questioned, and searched Plaintiffs because he perc

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Mr. Martinez by telling him that he would lose his lawful permanent residency if he did not cooperate.

164. As set forth in paragraphs 106 through 115, Defendant Latschar did not subject Caucasian motorists, who were similarly situated to Plaintiffs, to detentions as lengthy or invasive as that to which he subjected Plaintiffs.

165.

suspicion or probable cause to believe that an offense had been or was being committed, as set forth in paragraphs 71 through 106 above.

170. Defendant Long falsely imprisoned Plaintiffs by detaining them on the roadside of I-10, transporting them to the HCSO, and causing them to be detained at the HCSO for approximately two hours, without reasonable suspicion or probable cause to believe that an offense had been or was being committed, as set forth in paragraphs 65 through 105 above.

171. Defendant Covington falsely imprisoned Plaintiffs by deciding, together with Defendants Latschar and Long, to transport Plaintiff

176. In falsely imprisoning Plaintiffs, Defendants Latschar, Long, Covington and Fowler acted in reckless disregard of the safety and well-being of Plaintiffs, who were not engaged in criminal activity.

Count X
False Arrest
(Mississippi Common Law and Mississippi Tort Claims Act)
On Behalf of All Plaintiffs Against Defendant Hancock County, Mississippi

177. Defendants Latschar, Long, Covington and Fowler falsely arrested Plaintiffs, in violation of Mississippi common law, while these Defendants were acting in the course and scope of their employment by the HCSO.

178. Hancock County, Mississippi is responsible for these actions of its employees under the Mississippi Tort Claims Act. Miss. Code §§ 11-46-1 *et seq.*

179. Defendants Latschar, Long and Covington caused the false arrest of Plaintiffs by causing them to be transported to the HCSO and detained there for approximately two hours, without probable cause to believe that an offense had been or was being committed, as set forth in paragraphs 71 through 115 above.

180. Defendant Fowler falsely arrested Plaintiffs A.M.M., A.I.M., E.A.M., and Ms. Martinez by detaining them in a room at the HCSO, as set forth in paragraphs 81 through 87 above, without probable cause to believe that an offense had been or was being committed.

181. Defendant Fowler falsely arrested Mr. Martinez by detaining him at the HCSM by d

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CERTIFICATE OF SERVICE

I certify that on December 21, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide service to the following:

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