

Russell M Adams
CLERK SUPERIOR COURT

IN THE SUPERIOR COURT OF GLYNN COUNTY
STATE OF GEORGIA

**DEBRA E. GANN, AS THE
ADMINISTRATOR OF THE
ESTATE OF KATIE KETTLES
SASSER, AND AS NEXT OF KIN
OF R.S., A MINOR CHILD**

Plaintiff,

v.

**GLYNN COUNTY POLICE
DEPARTMENT, GLYNN
COUNTY GEORGIA, JOHN
POWELL, BRIAN SCOTT, TOM
JUMP, SCOTT JACKSON,
STEPHANIE OLIVER, JUSTIN
FLOYD, RESDEN TALBERT,
HANK SCOTT, PARKER
MARCY, HEATHER SAVAGE
and KEVIN YARBOROUGH, in
their individual capacities.**

Defendants.

CE20-00161

Case No.: _____

JURY DEMAND

COMPLAINT FOR DAMAGES

DEBRA E. GANN, Plaintiff, Individually as the Administrator of the Estate of Katie Kettles Sasser and as Next of Kin of R.S., a minor child, files this Complaint for Damages and Demand for Jury Trial by showing the following:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff, Debra E. Gann, is the biological mother and duly appointed Executor of the Estate of Katie Kettles (“Katie”), deceased, and is a resident of Glynn County, Georgia.

2. Plaintiff, R.S., is a minor and the biological son of Katie Kettles, and is the proper party to bring a wrongful death claim pursuant to Georgia law. R.S.¹

claims are brought by Debra Gann as the legal custodian of R. S.

3. Defendant Glynn County Police Department is an organization and agency created by and part of the Glynn County Government. It can be served by providing a copy of this Complaint to the Chairman of the Board of Commissioners and to John Powell, Chief of Police at 157 Public Safety Boulevard, Brunswick, Georgia 31525.

4. Defendant Glynn County, Georgia (“the County”) is a political subdivision of the State of Georgia and a body corporate organized and existing under the Constitution of the State of Georgia. The County can be served through the Chairman of its Board of Commissioners, Michael Browning at 1725 Reynolds Street, Suite 302, Brunswick, Georgia 31520.

5. John Powell is the Glynn County Police Chief. He is a resident of Glynn County, Georgia and he can be served at 157 Public Safety Boulevard, Brunswick, Georgia 31525.

6. Brian Scott at all times relevant to this suit is the Assistant Chief of the Glynn County Police Department. He currently serves as the Chief of Police for the City of Vidalia. He can be served at 302 First Street East Vidalia, GA 30474.

7. Tom Jump is a Captain at the Glynn County Police Department. He is a resident of Glynn County and can be served at 157 Public Safety Boulevard, Brunswick, Georgia 31525.

¹ As R.S. is a minor, only her initials are being used. R.S.’s identity will be disclosed pursuant to the entry of a mutually agreed-upon protective order.

8. Scott Jackson is a Lieutenant at the Glynn County Police Department. He is a resident of Glynn County and can be served at 157 Public Safety Boulevard, Brunswick, Georgia 31525.
9. Resden Talbert is an officer at the Glynn County Police Department. He is a resident of Glynn County and can be served at 157 Public Safety Boulevard, Brunswick, Georgia 31525.
10. Hank Scott is an officer at the Glynn County Police Department. He is a resident of Glynn County and can be served at 157 Public Safety Boulevard, Brunswick, Georgia 31525.
11. Stephanie Oliver is an Investigator at the Glynn County Police Department. She is a resident of Glynn County and can be served at 157 Public Safety Boulevard, Brunswick, Georgia 31525.
12. Parker Marcy is an officer at the Glynn County Police Department. He is a resident of Glynn County and he can be served at 157 Public Safety Boulevard, Brunswick, Georgia 31525.
13. Justin Floyd is an officer at the Glynn County Police Department. He is a resident of Glynn County and he can be served at 157 Public Safety Boulevard, Brunswick, Georgia 31525.
14. Heather Savage is a patrol officer at the Glynn County Police Department. She is a resident of Jacksonville, Florida. She can be served at 157 Public Safety Boulevard, Brunswick, Georgia 31525.

15. Kevin Yarborough was a Glynn County Police officer at all relevant times hereto. Defendant Yarborough is a resident of Glynn County and can be served at 122 Timber Ridge Drive, Brunswick, Georgia 31525.

16. Jurisdiction and venue are proper in this Court.

GENERAL ALLEGATIONS

17. Robert Cory Sasser (“Sasser”) and Kattie Kettles Sasser (“Katie”) were married on or about September 25, 2010.

18. Sasser, at all relevant times hereto, was a supervising police officer for the Glynn County Police Department and served as a Lieutenant.

19. On or about March 22, 2018, Sasser and Katie separated and Katie moved into a separate residence, due to his erratic, violent behavior. Almost immediately after separation, Sasser began tracking Katie’s movements via various methods including activating the vehicle tracking option with her OnStar service on her car.

Sasser’s Unlawful Behavior and Defendants’ Cover-Up

20. Pursuant to the portions of the written domestic violence policy for the Glynn County Police Department that were provided, said enterprise has a “pro-arrest” policy when it comes to domestic violence issues.

21. According to the policy, “When violence has occurred or been threatened, the primary responsibility of the responding police officers is to investigate a crime, and take the necessary action dictated by the circumstances. If probable cause can be established that a crime has been committed, the officers are expected to make an arrest.”

22. According to the Glynn County Police Department policy, *“Failure to take necessary action in a case of domestic violence can lead to civil liability for failure to protect on the part of police officers and the Department.”*

23. Two of the stated goals of the Glynn County Police Department’s domestic violence policy are as follows: A) to reduce family homicides and B) to reduce family assaults.

24. This complaint for damages shows in great detail how the leadership of the Glynn County Police Department have failed to follow Department Policy and have actually caused family violence and homicide to occur through negligence, nepotism, and criminal acts.

25. The Department’s domestic violence policy defines acts of family violence in the same manner as the state legislature:

As used in this article, the term “family violence” means the occurrence of one or more of the following acts between past or present spouses, persons who are parents of the same child, parents and children, stepparents and stepchildren, foster parents and foster children, or other persons living or formerly living in the same household: (1) Any felony; or (2) The commission of offenses of battery, simple battery, simple assault, stalking, criminal damage to property, unlawful restraint, or criminal trespass.

26. The domestic violence policy clearly delineates that in the instance of a dispute over personal property, Glynn County Police Officers shall advise the claimant that claims to personal property will not be enforced by the Department.

27. Furthermore, the policy states that claimants may not trespass upon the property of another for purposes of removing or recovering property without a court order empowering them to do so.

28. According to the Departmental Policy on domestic violence, people who commit the offenses of battery, simple battery, simple assault, stalking, criminal trespass, or any other offense including felony offenses are to be arrested, with or without a warrant, and taken to jail.
29. According to the policy, in calls involving family or domestic violence, officers of the department will abide by O.C.G.A. § 19-13-1, Family Violence. Pursuant to that act, an officer can make a warrantless arrest for a misdemeanor not committed in his/her immediate presence.
30. Further: “The officer will use the reasonable man presumption in the same respect as he/she would for the making of a felony arrest based on probable cause.”
31. The policy requires officers to make every reasonable effort to protect the victim from further abuse. Officers are to separate the victim from any assailant, administer first aid, and arrange for medical attention if the victim is hurt.
32. Finally, the policy lays out the advantages of bringing charges under the family violence law: A) An officer may make a warrantless arrest, B) The arresting officer *can recommend* that no bond be set prior to a hearing. C) Magistrate or Judge can place special conditions on bond including but not limited to no further violence, no contact with victim or victim's family, D) batterer counseling and any other conditions necessary to prevent further violence. E) Family violence reports can help to establish a pattern of abuse for custody/divorce matters and future criminal complaints.
33. The Glynn County Police Department consistently fails to follow its own policy and procedures when a police officer is the perpetrator of domestic violence.

Sasser Stalks Katie and commits privacy crime of “Peeping Tom”

A person commits the offense of stalking when he or she follows, places under surveillance, or contacts another person at or about a place or places without the consent of the other person for the purpose of harassing and intimidating the other person. O.C.G.A. § 16-5-90

34. When Katie and Sasser separated, Katie moved out of the marital home and set up a separate residence in a neighborhood behind the Home Depot in Brunswick, Georgia. Sasser kept his truck and Katie kept *her* Chevy Tahoe. Each party maintained and paid for the respective vehicle in their possession.

35. On May 11th, 2018, Sasser called ONSTAR and set up an application that allowed him to track Katie’s vehicle, a Chevy Tahoe.

36. On May 13th, 2018, Sasser and Katie had been separated for a period of approximately two months but were still legally married.

37. On May 13, 2018, around 2:09 a.m., Sasser travelled across town from his home in Sterling to the area of Katie’s neighborhood located behind the Home Depot and parked his truck across the street.

38. Despite admitting to police that he knew the entry code to Katie’s gated community, he parked outside of it and walked into the neighborhood.

39. Sasser told police he walked to her house and noticed three cars parked outside. He started looking around the house and in windows. He approached a window near the living room of the home and peered inside. It was at this time that he saw Katie kissing Hall.

40. It is unlawful to act as a “Peeping Tom” under Georgia law.

The term "Peeping Tom" means a person who peeps through windows or doors, or other like places, on or about the premises of another for the purpose of spying upon or invading the privacy of the

persons spied upon and the doing of any other acts of a similar nature which invade the privacy of such persons. O.C.G.A. § 16-11-61.

41. It is hard to imagine how any reasonable officer would not conclude that Sasser was invading Katie's privacy by peeping in her windows at 3 a.m.

42. Assistant Chief Brian Scott wrote in a police report he authored on May 22, 2018 that Sasser's explanations and behavior were questionable and that "he may have committed the offense of stalking." This view was communicated to Chief Powell.

43. Sasser was never charged with stalking or "Peeping Tom."

Sasser Unlawfully Accesses Computer Databases to Obtain Information on Hall

44. On May 13, 2018, after peeping through Katie's windows, Sasser then contacted the Glynn County Police non-emergency dispatch and illegally requested three vehicle license tags be queried. Of the three vehicle license tags that were queried, a silver 2017 Ford F-250 returned to Johnny Edward Hall Jr. Sasser was informed of Hall's name and address in Darien, by dispatch personnel. At that time, dispatch informed Sasser they were unable to do a driver's license check on Hall.

45. It is unlawful for police officers to access information through police databases for personal purposes. Despite Sasser telling fellow Officers at the scene that he had run the man's information and that his name was John Hall, Glynn County Police did not charge him and he received no reprimand for unlawfully accessing this information for his own personal use – information that Sasser ultimately used to determine that Hall lived on Tolomato Island in

McIntosh County, Georgia, which was the location Sasser committed the murder of both Kettles and Sasser.

46. At approximately 2:29 a.m., Sasser used his Glynn County Police Department assigned ORI and computer system to perform a GCIC query of Hall's vehicle license tag and Hall's name to obtain his driver's license information. The query would have yielded Hall's name, date of birth, address, vehicle information, and a photograph.

47. Despite Sasser telling fellow Officers at the scene that he had run the Hall's information and that his name was John Hall, Glynn County Police did not charge him and he received no reprimand for unlawfully accessing this information for his own personal use.

48. Records in the possession of the Glynn County police also show that Sasser violated Georgia law by again accessing this information on May 13, 2018 pursuant to O.C.G.A. §§ 16-9-93 and 35-3-38.

Sasser commits crimes of Attempted Burglary, Terroristic Threats and Obstruction

49. On May 13, 2018, at 3:10 a.m., Hall called 911 and requested the police come to Katie's residence. Hall informed the 911 operator that someone was "trying to break in," and someone was "kicking the door in." Multiple Glynn County Police Department Officers responded to Katie's residence to find Sasser outside the residence, and Katie and John Hall inside.

50. Sasser was on Katie's property in a highly agitated state, wearing shorts and a white t-shirt with a baseball cap turned backwards. Some officers did not immediately recognize him.

51. Upon the arrival of Glynn County Police Officers dispatched to the scene, Katie and Hall both told Officers Parker Marcy and Justin Floyd that Sasser was trying to break down the door of Katie's residence and had threatened to kill everyone inside the house. Katie told Officer Justin Floyd that Sasser said, "I'm going to kill you", "I'm going to kill him" and then again, "I'm going to kill you."

52. Hall corroborated this account, stating that Sasser claimed he was "going to kill everyone inside the house" constituting terroristic threats under O.C.G.A. § 16-11-37.

53. Sasser admitted to pounding and hitting the door at 3 A.M. but explained to his fellow officers that he knows how to kick in a door and would have done so if he was really trying to break into the residence. Sasser proclaimed to Officer Marcy, "I'm not dumb." Glynn County Police Officers joked and laughed about the situation with Sasser and they all agreed that Sasser had probably given the house a good ole Glynn County "police knock."

54. Sasser pointed out that he had been the commander of the SWAT team and that he knew how to break into a house.

55. Sasser admitted to Police Officers that he clandestinely parked his truck across the street from Katie's neighborhood and that he snuck around looking into the windows of her house. He also told officers he was not going to leave until he

had the keys to Katie's vehicle, a Chevy Tahoe. He demanded that Officers retrieve his keys.

56. While Katie was speaking to police on the front porch of her residence, Sasser rushed at Katie, physically assaulted her and physically pushed her out of the doorway of her home and then tried to force his way into the residence by trying to pull her hand off the door handle.

57. Sasser committed simple battery upon Katie and attempted to commit burglary, a felony offense, when he attempted to force his way into the house by pushing her and trying to pry her hand off of her front door, but he was not arrested. Sasser told officers he was just trying to get the keys to Katie's Tahoe.

58. As Sasser was being dragged off the porch he menacingly threatened Katie by pointing his hand and index finger at her and proclaiming, "You Know What Is Going to Happen!"

59. After being forcibly removed from Katie's porch, Sasser tried to confront Katie again and was again held back by Officers.

60. Sasser swatted Officers away from him, physically hitting and pushing them away, and continued to yell at Katie and commanded the officers to get him the keys to "his" Tahoe. All of the officers on the scene at that time were subordinate to Sasser within the Glynn County Police Department.

61. When Officer Parker Marcy attempted to interview Sasser, he disrespectfully referred to him as "Parker" and refused to speak to him. Sasser told Officer Marcy that he would only speak to fellow Lieutenant Scott Jackson. These acts constituted obstruction of justice pursuant to O.C.G.A. § 16-10-24 (b).

62. Other than to stop his attack upon Katie and her home, at no point did police officers detain, control or otherwise hinder Sasser's movement around the property as police attempted to investigate the ongoing domestic violence situation.

Officers' Disregard Department Policy and Help Sasser Extort Katie

63. After Sasser was prevented from obtaining the keys himself, he ordered his fellow officers to get him the keys to the Chevy Tahoe.

64. Officers did not follow the Glynn County Police Department's written policy on domestic violence. Officers did not notify Sasser that they would not enforce his claim on the Chevy Tahoe.

65. To the contrary, Officers told Sasser that they would follow his command and instruction that they retrieve the keys to his wife's vehicle.

66. Instead of arresting Sasser for crimes committed in their presence, Officer Marcy and Officer Floyd entered Katie's home and informed her that Sasser wanted the keys to the Chevy Tahoe.

67. Officer Floyd made clear that Sasser wanted the keys to the Tahoe and that giving up the keys was "what it was going to take" in order for Sasser to leave the residence.

68. At that point, Katie reluctantly gave up the keys of her own personal vehicle on the condition that the officers would make Sasser leave. Officer Marcy immediately gave the keys to Sasser.

69. Instead of leaving, Sasser began removing Katie's personal items from her vehicle.

70. On his bodycam footage, a fellow Officer asked Marcy if they should wait to see who actually owned the vehicle before giving Sasser the keys, and Officer Marcy said the question was moot because the parties were married, he had seen them both in the vehicle in the past, they both owned the vehicle since it was “communal” property and she had agreed to give Sasser the keys so that was the end of their inquiry.

71. Officer Marcy and Officer Floyd violated department policy and committed the crime of Theft by Extortion in violation of O.C.G.A. § 16-8-16 when they acted in concert with Sasser, made it obvious that police would not take action against Sasser, and indicated that the only way Katie could get Sasser to leave her house was if she gave up the keys to her Chevy Tahoe.

72. Officers Marcy and Floyd had probable cause to arrest Sasser and violated the domestic violence policy of the Glynn County Police Department and violated their Oath of Office in Violation of O.C.G.A. §16-10-1 by failing to arrest Sasser and by participating in Sasser’s scheme to extort Katie out of her vehicle by means of intimidation and domestic violence.

73. Katie made clear to Officers that she was afraid for her life and would have to vacate her home as soon as they left due to their failure to act to protect her from Sasser.

Lieutenant Jackson Protects Sasser from Arrest

74. The physical altercation between Sasser and Katie was witnessed by multiple officers and recorded on bodycam footage. All of this was reported to

Lieutenant Scott Jackson, the patrol division manager who reported to the scene of the domestic violence call.

75. Sasser committed Stalking under the Family Violence Act, Simple Battery under the Family Violence Act, Criminal Trespass under the Family Violence Act, Felony Obstruction with Violence, Misdemeanor Obstruction with Violence, Disorderly Conduct, and Attempted Burglary in the immediate presence of his fellow officers. Most of these crimes are on recorded video tape.

76. Sasser admitted to being a Peeping Tom and probable cause existed to arrest him for Terroristic Threats based on two eye-witness statements regarding his promise to kill everyone inside Katie's home in conjunction with his admission that he did in fact kick the door to Katie's home.

77. Lieutenant Scott Jackson arrived on the scene and was briefed by Officer Parker Marcy regarding what had occurred. Marcy told Jackson about the terroristic threats that were made, the allegations that Sasser had kicked the door, and the obstruction of officers.

78. Lieutenant Jackson asked if there was damage to the door and was relieved to hear that no damage was visible, indicating that if there was no provable damage then nothing needed to be done.

79. Officer Marcy told him at that time that the issue of the terroristic threats remained unresolved.

80. Sasser interrupted this briefing, again committing misdemeanor obstruction, and Lieutenant Jackson told Sasser that "We have an issue."

81. Officer Jackson was able to enter Katie's neighborhood because Sasser entered the security code on the security gate. Once inside, Lieutenant Jackson asked all officers to meet with him.
82. All Officers on scene either turned off or muted the microphone on their bodycams while they gathered around Jackson to discuss what happened and how the "issue" was going to be resolved. There is camera footage of the discussion but there is no audio.
83. Sasser walked around the group menacingly while filming them with his camera. He eventually joined the group and took part in the discussion, deciding his own fate with his subordinates; and pointing aggressively at Katie's house and speaking in an agitated manner.
84. At the conclusion of the discussion with Lieutenant Jackson, Officer Marcy reactivated the sound on his body-cam and returned to Katie's house to ask for more property. This time he wanted jewelry that Sasser claimed belonged to him.
85. This action constituted yet another violation of the Glynn County Police Department's domestic violence policy and constituted the crime of Attempted Theft by Extortion. Sasser was still on scene, staring at her front door.
86. Katie stated that she did not know where the jewelry was located.
87. Officer Marcy was then called over to speak with Lieutenant Jackson and fellow officers again. He again muted the sound on his bodycam.

88. Officer Floyd was then sent to request the jewelry from Katie. Officer Floyd violated the domestic violence policy and attempted Theft by Extortion on behalf of Sasser while he watched. His request was turned down.

89. Sasser was then allowed to walk up to the house and verbally confront Katie regarding the rings in the presence of all officers on scene. After a verbal confrontation ensued, where Katie reminded Sasser and all police officers that the property dispute was a civil matter to be handled by the Courts, Lieutenant Jackson finally asked Sasser to leave the property.

90. Lieutenant Jackson wrote in his report that Sasser had called a friend to the scene and that the friend followed Sasser out of the neighborhood as Sasser was driving Katie's Chevy Tahoe.

91. Later, Lieutenant Jackson observed that Sasser's friend had brought him back to pick up Sasser's truck which had been parked along a woodline outside of Katie's neighborhood.

92. This left Katie without a vehicle or means of transportation.

93. Even after Sasser left, other officers again tried to obtain the jewelry on behalf of Sasser. These officers told Katie that Sasser told them where he thought Katie could find the jewelry. Katie refused these attempts to obtain her property by police, stating that she already gave up the car and just wanted Sasser and police to leave so she could go somewhere safe.

94. Katie asked and pleaded with officers to know why Sasser was not being arrested.

95. Katie asked and pleaded with the officers to explain how a man can show up at a person's house at 3 A.M., try to kick the door in and commit crimes and not be arrested.

96. Hall complained to police that, "Y'all know this ain't right." Hall opined that he could not understand how a man tries to kick in a woman's door, threatens to kill people, and then gets to leave with her car.

97. Hall informed Officer Floyd that he had called his lawyer, Jason Clark, and informed him of the police misconduct that was occurring.

98. Officer Floyd explained that police didn't have probable cause to make any arrests and that "He didn't need anyone to tell him how to do his job."

99. Lieutenant Jackson and the officers on scene allowed Sasser to remove Katie's belongings from the Tahoe and drive away from the scene in her Vehicle.

100. Lieutenant Scott Jackson committed the offense of Improperly Influencing a Police Officer in violation of O.C.G.A. § 16-10-5, Violation of Oath of Office in violation of §16-10-1, Hindering the Apprehension or punishment of a Criminal in violation of §16-10-50, and Influencing Witnesses in violation of O.C.G.A. §§16-10-93 when he instructed the officers under his command to not arrest Sasser for his crimes.

101. Lieutenant Scott Jackson committed the offense of False Statements and Writings in violation of O.C.G.A. §16-10-20, when he wrote a police report that 1) falsely claimed that there was not probable cause to arrest Sasser for any crime, and 2) falsely claimed that there was no evidence and no account that a physical altercation had occurred at the residence on May 13, 2018.

Backlash and Damage Control

102. There was an uproar in the Glynn County Police Department about what happened and the fact that Sasser faced no disciplinary or criminal repercussions for his May 13, 2018 actions.

103. Caving to internal pressure from complaints and leaks about the incident on social media, Chief Powell assigned Assistant Chief Brian Scott to review the evidence and reports from the incident to determine whether Sasser violated department policy or the laws of the State of Georgia.

104. The fact that the Chief and Assistant Chief were looking into Sasser's conduct was leaked to Sasser by his cohorts in the department.

105. Because Sasser was not arrested, he was at liberty to further harass and intimidate Katie at will. And he did – returning to Katie's residence that same day at approximately 1 P.M. when he spoke to her for at least two hours.

106. Because Sasser was allowed to take Katie's vehicle and leave the scene of his domestic crimes; between May 13th and May 15th, Sasser was able to leverage the return of the vehicle to his wife and influence her testimony about what happened on the night of May 13th.

107. Brian Scott conducted a follow up interview of Katie on May 14th, after Sasser had talked to her for several hours, and at that time she said “nothing” had happened. Confronted with the fact there was video footage from multiple body cameras and that her statements to police on the 13th were recorded, Katie told Officer Scott that whatever she told police at the time they responded to the domestic violence call was true.

108. After Katie's interview with Brian Scott, someone in the department made Sasser aware that she had been interviewed by the Assistant Chief of Police, prompting Sasser to call her on May 15 and demand to know what she told Brian Scott.

109. After an independent investigation into the situation, Assistant Chief Brian Scott determined that "at the very least," Sasser committed the offense(s) of simple battery and criminal trespass under the family violence act and should have been arrested.

110. In the written opinion of Brian Scott, an opinion delivered to and discussed with Chief Powell, Scott opines that Sasser may have committed the following offenses: Simple Battery, Criminal Trespass, Obstruction of Law Enforcement Officers, Disorderly Conduct and Stalking.

111. Brian Scott also documented terroristic threats and opined that all of the bodycam footage was consistent in showing that crimes of family violence had occurred.

112. Chief Powell inexplicably decided that the only crimes Sasser would be charged with were simple battery and criminal trespass under the family violence act.

113. The management of the Glynn County Police Department consistently avoided arresting and properly prosecuting Sasser for serious criminal offenses. Sasser appeared to have leverage on virtually every police official in the department. Sasser was part of the management at the department and had memorized the Department's policy manual – often threatening to reveal policy

violations, commit retaliation or worse against officers who questioned his corrupt activities.

114. The department was divided between the corrupt and those seeking to honestly serve our community.

115. As Sasser was continuously in the news in the Spring and early summer of 2018, and in response to open records requests for information about Sasser's disciplinary records within the Department, the Glynn County Police Department stated publicly that Sasser's disciplinary file records after 2011 are "missing." The Glynn County Police Department has no explanation for the disappearance of these records.

116. Whether his disciplinary records for the last 7 years of his notorious career were spoliated in an effort to stave off claims of negligent retention or whether corrupt officers removed and destroyed these records for some other reason is unknown at this time.

117. However, there is evidence of his checkered history with the Police Department. According to a document filed against Sasser by Chief Powell in June of 2018 when he finally moved to terminate Sasser's employment, the Glynn County Police Department was in possession of records showing an abysmal service record up until 2005.

- A) 12-7-2001: Unbecoming Conduct -Written Reprimand
- B) 6-24-2002: Unbecoming Conduct -Written Reprimand
- C) 12-10-2002: improper Emergency Operation of Vehicle – 1-day suspension

- D) 02-17-2003: Failure to Comply with Lawful Order – Reprimand and 1-day suspension
- E) 09-02-2003: Failed to complete incident report as required – Reprimand
- F) 09-12-2003: Preliminary Investigation by Patrol Officers – written reprimand
- G) 10-13-2003: Unbecoming Conduct – Suspended 3 days
- H) 12-31-2003: Insubordination – Written Reprimand and Suspended 3 days
- I) 01-05-2004: Insubordination – Written Reprimand and Suspension of 3 days without pay for Violation of GCPD Policy 22.3.1 B, C & P and Glynn County Personnel Policy 9.2.4(B)(14) Violation of Department Rules
- J) 01-27-2005 – Administrative Leave with Pay for Killing Caroline Small
- K) 10-04-2005 – Written Reprimand Suspension for 3 days without pay violation of GCPD Policy 16.2.1. A.2.6 (misusing department property), 16.2.1.A.2.14 (other acts of the employee that might bring discredit upon the employee or the department, 16.21.A.5.K (Criticism of Officer or Department), 16.2.1.A.5.JJ (Sexual Harassment) and Glynn County Personnel Policy 9.2.B 9 (Discourteous treatment of other employees, 9.2.(C) (6) (Improper Use of County Property)

L) 02-06-2011 – Demoted from Lieutenant to Sargent for violation of GCPD policies 13.7.1 (Harassment), and 16.2.1(Code of Conduct) and 16.2.1.A.26 (misuse of county computers) and Violation of Glynn County Personnel Policy 9.2.4. (b) (9) (Discourteous treatment of another employee and 9.2.4 (B) (9) Violation of Department policies.

118. The discipline records from 2001 to 2011 alone show a pattern of misconduct escalating at an alarming pace. The fact that Sasser was continuously promoted and held the rank of Lieutenant at the Department in 2018 coupled with the fact that his entire disciplinary record has now either been destroyed and/or disappeared for the period of time from 2011 until 2018 is damning to the enterprise and its management.

119. As discipline records widely reported in the media show, Sasser told his fellow officers back in 2011 that he was “untouchable.”

120. Rather than instruct Brian Scott to swear out warrants for all of the offenses identified by him or the myriad of other offenses demanded by the evidence, Chief Powell instructed Brian Scott to present the evidence to State Court Solicitor Maria Lague to see what her opinion was of Sasser’s conduct.

121. This is not the usual course of conduct for police officers seeking warrants on common family violence offenses. The Chief and Assistant Chief of Police are well versed in the criminal code and are familiar with the elements of these crimes and whether probable cause exists for an arrest. A lawyer was not needed to explain these offenses to them.

122. The presentation to Maria Lugue was done because Chief Powell and Assistant Chief Scott could avoid appearing as if they were making moves against Sasser.²

123. Solicitor Maria Lugue confirmed Brian Scott's opinion that crimes had been committed by Sasser, and this confirmation was placed in Brian Scott's report to give further cover to Chief Powell within the department.

124. Brian Scott then requested Chief Magistrate Alex Atwood issue warrants for the two least serious offenses committed in the early morning hours of May 13, 2018.

125. By going this route, and failing to disclose to Judge Atwood the extent of Sasser's criminal behavior on May 13, it would ensure that Sasser would receive an immediate bond and that the conditions of his bond would be minimally restrictive.

126. Again, Chief Powell and Brian Scott could avoid appearing as if they made a move on Sasser because Brian Scott's report on the issuance of the warrants makes it appear that Alex Atwood spontaneously made the decision to arrest Sasser rather than serve in his judicial role to evaluate whether probable cause should issue for his arrest.

127. Sasser was allowed to turn himself in to the Sheriff and on May 15, 2018 he was finally arrested for misdemeanor charges of O.C.G.A. §16-5-23(a)(1)

² Many weeks later, when Chief Powell did finally attempt to remove Sasser from his office as a manager and Lieutenant in the Police Department; the formal employment complaint brought against Sasser listed Obstruction of Law Enforcement as a crime that had been committed on May 13th, 2018.

Simple Battery Family Violence Act and O.C.G.A. § 16-7-21(b)(2) Criminal Trespass Family Violence Act when he showed up to the jail.

128. A bond was set up prior to him turning himself in and upon Sasser's immediate release from custody, he continued to surveil and contact Katie for criminal purposes.

129. In fact, she met with a lawyer to discuss filing for divorce on May 17. She travelled clandestinely to the meeting with the lawyer in a friend's vehicle, suspecting that she was being tracked by Sasser. Immediately after leaving the lawyer's office, Sasser called her to confront her about meeting with a lawyer. No one but her friend knew she was meeting with the lawyer.

130. On May 23, 2018 - Police were notified of Sasser's witness intimidation.

131. Police had assigned a crime victim liaison, Nicole Spannuth, ostensibly to keep Katie apprised of Sasser's whereabouts, to protect her by giving her a direct line of communication with the police at all times, and to give her the opportunity to alert police if she had any further problems with Sasser.

132. Katie told Spannuth that she believed Sasser was tracking her vehicle. Spannuth took diligent notes and entered them into the Department's case management system, Spillman, believing that they would be acted upon. Her role as victim liaison, instructed her to protect Katie by paying for her vehicle to be checked for tracking devices. It was during this check that it was discovered that a GPS tracking app was activated through ONSTAR by Sasser on May 11, 2018. All of this was entered into the Department's computer management system by Spannuth on May 23rd.

133. No officer at the Glynn County Police Department ever moved to charge Sasser with stalking, obstruction, witness tampering or improper influencing of witnesses.

134. The racketeering violations that occurred surrounding the May 13 domestic violence incident and the subsequent cover up by the top brass at the Glynn County Police Department would be the beginning of a tale of woe that would result in the preventable murders of Hall and Katie.

GLYNN POLICE OFFICER SASSER ENGAGES IN ARMED STAND-OFF WITH FELLOW OFFICERS, SHERIFF OF GLYNN COUNTY and THE GEORGIA STATE PATROL – MANAGEMENT DELAYS HIS ARREST AND MINIMIZES CHARGES

135. On May 15th, Sasser was booked and immediately released on bond. Special conditions of the bond noted that Sasser was to have no violent contact with Katie, that he was to "attend psychiatric counseling weekly as prescribed by physician," and "all weapons to remain secured in safe/service weapons returned to Glynn Co. PD."

136. One day later, on May 16, 2018 and lasting into the early morning of May 17, Sasser barricaded himself in his car at Hutcheson Plantation, in Brunswick, Georgia.

137. During the standoff, Sasser notified law enforcement that he had multiple guns in his possession and was prepared to and would kill them if they approached.

138. During the standoff, Sasser expressed concern about police taking his firearms.

139. During the standoff, Police assured Sasser that his firearms would be turned over to his family and would not be taken from him.

140. Police and sheriff's deputies attempted to check on Sasser and when they approached his truck he discharged a firearm and forced law enforcement officers from the police department and Sheriff's Office to run for their lives and take cover.

141. Later he claimed to have shot himself in the chest and threatened to shoot any officer that approached his car. This was a lie.

142. Over 100 officers from the Glynn County Police, Glynn County Sheriff's Office and Georgia State Patrol including but not limited to three SWAT teams, helicopters, and armored cars were called to the scene of the standoff.

143. After a lengthy standoff lasting many hours, fellow law enforcement was finally able to subdue Sasser with a taser.

144. While Sasser was being examined by medical personnel for his taser wounds, he physically assaulted two officers.

145. At the time of his seizure by police, a firearm was observed in plain view inside his vehicle but it was not secured by police.

146. Glynn County Police ensured that they took physical control of Sasser rather than Georgia State Patrol or the Glynn County Sheriff's Office.

147. Management of the Glynn County Police Department decided to protect Sasser by diverting him to a different location.

148. Despite drawing the resources of all law enforcement in Glynn County and surrounding counties, putting himself and others at risk, committing multiple crimes and felony offenses and violently hurting two law enforcement officers;

Sasser was not charged with any crimes, but instead, was taken to a hospital and then forcibly admitted into a mental health facility.

149. His fellow Glynn County Officers took him to this location.

150. The law and Glynn County Police Department Policy is clear; a search may be made incident to arrest. He had been apprehended out of his vehicle and at least one firearm used in the standoff with police was in plain sight. However, his Truck was not searched.

151. The firearm and/or firearms were left inside his vehicle along with whatever other evidence was there.

152. Police did not inventory his vehicle then or search it incident after they impounded the vehicle.

153. Officer Hank Scott and Officer Resden Talbert, in conjunction with directives from management from the department; submitted a deficient search warrant application for the truck on May 21, 2018.

154. In his police report on this subject, Officer Hank Scott states that the search warrant's purpose was to search the vehicle "to obtain the guns" Sasser had used to fire upon officers as they approached his vehicle.

155. Judge Cabiness reviewed the search warrant application, rejected it and told them why it was defective. A revised search warrant was never submitted to the Court.

156. All of this of course was purposeful and by design. The Management of Glynn County did everything in their power to ensure that the appearance of a

criminal investigation existed but that no physical evidence was actually gathered that could be used against Sasser at a future trial.

157. Police made sure that it appeared as if Judge Cabiness was unreasonable in rejecting the search warrant; so they would have plausible deniability should Sasser do something dangerous with the guns and evidence they were going to return to him.

158. As a result, none of the guns Sasser claimed were in his possession during the standoff were ever seized by police. Sasser would retrieve these weapons upon his release from the mental health facility and bring them to the scene of the Murder of Hall and Katie weeks later. It is likely that the gun photographed in his truck on May 17 and released to his son on May 22 was the same weapon he used to end his own life.

159. On May 22, 2018, Sasser called Lieutenant Tom Jump from Saint Simons by the Sea and asked that his vehicle be released to his son, Bryce Sasser.

160. The vehicle and its contents and evidence, including the firearms, were then released by Tom Jump and Resden Talbert to Bryce Sasser.

161. Management at the Glynn County Police Department decided not to charge Sasser with Aggravated Assault despite discharging a firearm as officers approached his vehicle and causing them to run for cover.

162. Management at the Glynn County Police Department decided not to charge Sasser with Terroristic Threats despite his threat to kill officers with multiple guns.

163. Management at the Glynn County Police Department decided not to charge Sasser with Possession of a Firearm during the Commission of a Crime, despite

multiple officers seeing at least one firearm inside Sasser's vehicle in prohibition of the conditions of his bond from the May 13th, 2018 domestic violence incident.

Backlash and Damage Control in the Culture of Corruption

164. The Glynn County Magistrate Court took quick action to revoke Sasser's bond for the May 13 domestic violence charges and mandated that the Sheriff take immediate custody of Sasser upon his release from Saint Simons by the Sea.

165. Public outcry grew and Chief Powell was forced to charge Sasser with two lesser counts of felony Obstruction of an Officer and one count of misdemeanor obstruction of an officer.

166. As Sasser's attorney Alan Tucker opined to the Georgia Bureau of Investigation after the murders of Katie and Hall, "*No one was going to prosecute this boy.*"

167. Sasser was not charged with stalking, terroristic threats, aggravated assault, or possession of a firearm during the commission of a crime despite the existence of overwhelming probable cause that he had in fact committed these offenses.

168. Had Sasser been charged with Felony offenses for his conduct on May 13 or May 17, or had the full extent of his ongoing and menacing criminality towards Katie and others been made known to either the District Attorney or the Magistrate Court, it is highly likely that Katie, Hall and Sasser would all still be alive.

169. Based off the limited information that was shared with the District Attorney's Office and the Magistrate Court, and one of the police officer victims

coming forward and stating that he wanted to drop the charges; a consent bond was arranged for the day of his release from the mental health facility and he was once again allowed to be booked and released from custody on the same day: May 24th, 2018. He then retrieved his truck and its contents at that time and left town for Alabama with his son.

170. The terms of the bond order allowed Sasser to be trusted to turn over his firearms to his son Bryce Sasser in the privacy of his home. Bryce Sasser was to be trusted to keep his father away from the guns.

171. Glynn County police did not disclose to Judge Cabiness or to the District Attorney's Office that Officers knew and had documented that Sasser had been actively stalking and tracking Katie, that he had threatened to shoot multiple officers, that he had threatened to kill officers with what he claimed were multiple guns, which they failed to take into evidence, that he had threatened to kill Katie and Hall, that he had discharged a firearm and committed aggravated assault on fellow officers, or that he had been actively engaged in the crimes of Witness Tampering, Aggravated Assault, Terroristic Threats, Unlawful access of computer databases in efforts to find Hall and Possession of a Firearm during the Commission of a Crime.

172. Roughly five days later, May 29, 2018, Sasser began the planning stage of his intended double-murder suicide. This is reflected by his internet search history on his cell phone. Specifically, he begins researching various legal issues such as "how does law enforcement deal with an individual threatening to commit suicide? What is the likely outcome?," "police violate civil rights when trying to stop

suicide," and "Suicide intervention: How cops can avoid getting sued." This planning and research continues on 6/2 when he performed numerous searches on "bond revocation."

173. The following day, May 30, 2018, Sasser met with CSRA Probation Officer, Amy Corcoran. In that meeting Corcoran instructed Sasser to download the electronic reporting application onto his phone for GPS monitoring as required by his Bond Order.

174. However, Corcoran ultimately did not require Sasser to download the monitoring application as required by the bond order because Sasser told her that his attorney would be filing a "motion to modify his bond." CSRA Amy Corcoran further allowed Sasser to remain in Glynn County until the following day.

175. Chief Powell, Assistant Chief Brian Scott, Lieutenant Tom Jump, Lieutenant Scott Jackson, Resden Talbert and Hank Scott and all other managers and officers, known and unknown, that participated in the decision making process over placing Sasser at Saint Simons by the Sea without charging him, charging decisions, and evidence collection and preservation committed the offenses of Tampering with Evidence in violation of O.C.G.A. § 16-10-94, False Statements and Writings in violation of O.C.G.A. § 16-10-20, Improperly Influencing a Police Officer in violation of O.C.G.A. § 16-10-5, Violation of Oath of Office in violation of O.C.G.A. § 16-10-1, Hindering the Apprehension or punishment of a Criminal in violation of O.C.G.A. § 16-10-50, and Influencing Witnesses in violation of O.C.G.A. § 16-10-93 when they instructed the officers under their command to not charge Sasser for known crimes, released evidence of his crimes without

documentation or preservation, and failed to disclose all material facts to the judiciary and the Office of the District Attorney prior to his release on bond.

GLYNN POLICE OFFICER SASSER COMMITS FELONY OFFENSES OF AGGRAVATED STALKING AND TERRORISTIC THREATS – MANAGEMENT AND OFFICERS VIOLATE THEIR OATH OF OFFICE AND FAIL TO ARREST OR NOTIFY THE COURT OF KNOWN AND PERTINENT FACTS

Stalking and Terroristic Threats and Acts – June 26, 2018

176. On June 26, 2018, Sasser and Katie had their initial divorce hearing in Glynn County, Georgia, which concluded at approximately 4:40 p.m. She then travelled to Marshside restaurant.

177. After Marshside restaurant, Katie met Hall and a friend named Craig Pearson at Moondoggy's Pizza around 6 p.m. for dinner and trivia.

178. Between 8:30 and 9 p.m., Sasser and his son, Bryce Sasser, showed up at Moondoggy's Pizza.

179. Sasser and his son Bryce had already had dinner that night. However, Sasser knew that Katie and John Hall were at the restaurant and Sasser went there for the sole purpose of intimidating and threatening Katie and Hall.

180. Bryce and Sasser entered the restaurant. The bartender, Chris Parks, let Katie know that Sasser was in the bar. She turned to see Cory and made eye contact with him.

181. Eyewitness accounts state that Sasser stared down Katie and Hall the entire time he was in the restaurant.

182. At one point, Katie tried to walk through the bar and Sasser cut off her path by walking to the same spot. He continuously stared at Katie and Hall.

183. Sasser, after making eye contact with Hall, made his hand into the shape of a gun and pointed his finger at Hall and Katie.

184. At approximately 9:20 p.m., Katie contacted Glynn County Police Department Crime Victim Liaison Nicole Spannuth and informed her what had occurred. Specifically, she told her that Bryce and Sasser came into the restaurant and Sasser made his hand into the shape and form of a handgun and pointed it at Katie, Hall, and Pearson. Spannuth told Katie to call the police to report the incident.

185. Katie called Sheriff Jump about what happened and he also directed her to call 911.

186. At 9:27 p.m., Katie called Glynn County 911 to report the incident.

187. She told 911 operators that Sasser showed up where she was eating, and she came home and called Sheriff Jump who told her to call for a report and then leave her residence. Katie wanted to make an official report and wanted police officers to respond to her location.

188. At 9:29 p.m., *two minutes* after Katie called 911, Glynn County Police Officer Heather Savage called Sasser.

189. At 9:45 p.m., Officers were dispatched to look into the incident. Sergeant Herndon was dispatched to Moondoggy's Pizza and began driving towards the restaurant. Officer Sherman was dispatched to Katie's house and began driving to 200 Promenade Place. Officer Savage was made aware that these officers were assigned to investigate the incident reported to 911 by Katie.

190. At 9:48 p.m., Sasser spoke with Heather Savage again via telephone.

191. Shortly after his phone call with Officer Savage, Sasser called Sergeant Herndon and opened up the conversation by stating, “I heard you were looking for me.” Sasser went on to tell Sergeant Herndon that he and Bryce had been moving firearms around that day. He told Herndon that after divorce Court, he went home and took some firearms from his house and brought them to Bryce Sasser’s house. Specifically, he mentioned that the firearms he took over there to Bryce’s house were firearms that were supposed to go to his son River in the divorce.³

192. Sasser went on to tell Sergeant Herndon that his intent was to eat dinner but when he saw Katie he got the pizza to go. He explained that he saw someone behind Katie that he knew and pointed at him, but that he knew Katie was going to try to call the police about the situation.

193. Sasser became highly irritated when Sergeant Herndon told him that he had a job to do and would still be investigating the incident and documenting it in a report. Sasser asked him what there was to investigate and why he was going to make a report.

194. Disregarding Sasser’s attempts to dissuade him, Sergeant Herndon continued on to Moondoggy’s Pizza. Upon arrival, Sergeant Herndon made contact with Jordan Cumbest, the assistant manager. Cumbest stated that his bartender, Chris Parks, advised him of Sasser coming into the restaurant and his wife, Katie being at the bar with another male. Cumbest stated that Sasser and his son, Bryce came in the side door of the restaurant and ordered a pizza. He stated

³ This constituted an admission that he was in possession of firearms in violation of his bond and that Bryce had not taken possession of the firearms as he was mandated and agreed to do pursuant to the bond hearing before Judge Cabiness on May 24, 2018.

Sasser noticed Katie at the bar where she was sitting on the other side with Hall. Cumbest told Herndon that Sasser stared at them the entire time he was waiting on his pizza. Cumbest kept eyes on Sasser because he wanted to make sure nothing happened at the restaurant.

195. Cumbest told Herndon that Katie got up from the bar appearing to walk out when he observed Sasser cut across from the side door to the middle of the restaurant where Katie was about to walk. Cumbest stated that Katie went quickly back around to the other side of the bar and Sasser walked past her into a side room attached to the main dining room area.

196. Cumbest told Herndon that Sasser then rejoined Bryce and continued to stare down Hall and, in the end, raised his hand making a pistol with his fingers, pointed it at them, and left.

197. Sergeant Herndon documented all of this and briefed Assistant Chief Scott, who also briefed Chief Powell. Chief Powell assured Sergeant Herndon that his report and others would be forwarded to the Court.

198. No reports were ever forwarded to the Court.

199. In the meantime, Officer Sherman arrived at Katie's house while Sergeant Herndon was interviewing Cumbest at Moondoggy's Pizza.

200. Katie told Officer Sherman that she was sitting at the bar near the back of the restaurant when Sasser walked in her direction and made gun gestures with his hands.

201. Katie told Officer Sherman that she then received text messages from Bryce Sasser telling her that all of her belongings were across the street from the

marital residence. Katie told Officer Sherman that Sasser had been in town for a court hearing and was supposed to leave the county immediately following the hearing. Katie made clear to Officer Sherman that she wanted a report and documentation about the incident.

202. Officer Sherman documented this information.

203. The Glynn County Police informed Katie that they recommended that she not stay in her house that night for safety reasons, prompting her to stay at her mother's house.

204. Sasser continued to be informed of police information involving his case in real time as the information was being entered into the PD's case management system. Officer Savage would continue to speak with him repeatedly throughout the evening of June 26, 2018.

205. Sasser's criminal defense attorney was also given sensitive police information about the investigation by inside sources within the Department.

Culture of Corruption and Negligence Enable Sasser – June 27, 2018

206. On June 27, 2018, at 3:29 a.m., Sasser resumed his search to locate John Hall's residence. He texted a friend, Jarratt Sanford, and asked if he had "ever heard of Talamato island [neighborhood where Hall lived] in McIntosh." Sanford responded that he had "but [was] not sure where it's at."

207. Two minutes later, Sasser searched the internet from his phone for "talemoto island mcintosh."

208. At 8:20 a.m., Katie called Nicole Spannuth and informed her that she was going to the Magistrate Court Office to speak with the Judge about why Sasser

was still in town. Nicole told Katie that she was glad that Katie called 911 and made a report about the aggravated stalking and terroristic threat/act at Moondoggy's Pizza on June 26.

209. Katie told Spannuth, "Its like nothing is being done. Enough is Enough with this guy. He's lost his mind."

210. At 8:27 a.m., Sasser called McIntosh County Sheriff's Officer Corporal Carl Ralph Johnson. During the call, Sasser asked Corporal Johnson what he knew about John Hall.

211. Sasser then called 911 Operator and asked her to query the address of a residence on Tolomato Island claiming that he wanted to "buy it," but she claims to have refused.

212. That same morning, Sheriff Jump made CSRA Probation Officers Amy Corcoran and Katelyn Cross aware of the Moondoggy's Pizza incident from the previous night and instructed them to make him aware the next time Sasser came into Glynn County. However, neither Corcoran nor Cross informed Sheriff Jump that they had failed to require Sasser to install the electronic monitoring application on his phone that would have allowed them to know Sasser's GPS location at all times. In other words, without Sasser informing probation that he was coming back to Glynn County, no one would know his location.

213. At 9:38 a.m., Sasser went to Savannah Toyota to buy a new truck. Upon information and belief, this new vehicle was purchased to make it more difficult for law enforcement to recognize him while in Glynn County and the surrounding

areas. He traded in his 2016 white Ford F-150 and was seen moving an "AR15, a Glock (handgun), and possibly a hunting rifle" from the F150 into the Tacoma.

214. While Sasser was purchasing this vehicle, Katie was meeting with Glynn County Police Department Investigator Stephanie Oliver and was interviewed in detail about the incident at Moondoggy's Pizza. Katie informed Inv. Oliver of what had occurred and confirmed the details documented by Sergeant Herndon, Officer Sherman and 911 Dispatch.

215. At 11:30 a.m., Glynn County Police Department Detective Stephanie Oliver interviewed John Hall with his attorney, Jason Clark. This interview is conducted regarding the Moondoggy's incident. Hall reiterated what happened and how Sasser made his hand into the shape of a gun and pointed it at him. Hall made it abundantly clear that he feared for his, Katie, and his family's safety.

216. At 12:21 p.m., Sasser called a friend, Mollie Mancil. Location data from Sasser's cell phone indicated that Sasser began the call in/near Darien, McIntosh County, Georgia and was traveling north towards John Hall's residence.

217. At 12:41 p.m., Sasser called McIntosh County 911 Director Vickie Naugle on her personal cellphone while she was at work. Location data from Sasser's cellphone records indicate that Sasser is in McIntosh County, north of Hall's residence, near or on Highway 99. During the communication with Naugle, Sasser requested Naugle to query an address for him regarding a piece of property he heard was for sale by owner. Naugle told Sasser she was unable to perform the requested query for him.

218. At 12:58 p.m., Sasser called Darien Police Department Officer James Richard "Richie" Douberly. Location data from Sasser's cellphone indicated that Sasser traveled south on Highway 99 and passed the road for John Hall's residence.

219. Between 1:53 p.m. and 1:54 p.m., Sasser searched "John hall jr tolamato," "John hall jr tolamato mcintosh," and "John hall jr tolomato mcintosh," via his cellphone.

220. At 1:59 p.m., Sasser searched "public address for John hall jr darien," via his cellphone.

221. At approximately 2 p.m., Inv. Oliver briefed Captain Tom Jump on everything she had learned from all the police interviews and information that had been gathered since the June 26, 2018 incident at Moondoggy's Pizza. Inv. Oliver and Captain Tom Jump collaborated and inexplicably determined that Sasser did not violate any laws. Captain Tom Jump directed Inv. Oliver not to take out warrants for his arrest, but instead, to brief the judge about what she had learned and try to get Sasser's bond revoked.

222. At 2:24 p.m., Sasser received a call from David Gay. Location data from Sasser's cellphone indicate that Sasser was near Tolomato Island and Hall's residence.

223. At 2:38 p.m., Sasser searches "husband kills man who wife cheats with," via his cellphone.

224. At 2:43 p.m., Sasser called his son again. Location data from Sasser's cellphone indicate that he is near Tolomato and Hall's residence.

225. At 2:57 p.m., Sasser searches "hall address darien ga" and "john hall jr address darien ga," via his cellphone.
226. At 2:56 p.m., Inv. Oliver interviews Christopher Parks by telephone who was working at Moondoggy's Pizza on June 26, 2018. He confirmed that he was the one who told Katie that Sasser was in the restaurant, because he knew that Katie was about to get up and go the bathroom and he didn't want her to run into Sasser.
227. At 3:32 p.m., Sasser sent a text message to Joanna Hall, John Hall's wife, questioning, "Where is he [John Hall] now?"
228. At 3:33 p.m., Sasser received a text message from Joanna stating, "why?" Sasser did not respond to this text message at that time.
229. At 3:43 p.m., Sasser received a call from Mollie Mancil. Location data from Sasser's cellphone indicate that Sasser was near Darien, McIntosh County, Georgia.
230. At 3:49 p.m., rather than swear out probable cause for the crimes of Aggravated Stalking, Stalking and Terroristic Threats/Acts, Inv. Oliver followed Captain Jump's direction and called Judge Flay Cabiness to try to get him to revoke bond. Upon information and belief, Judge Cabiness asked her if she had bothered to contact CSRA Probation, at which time she responded that she had not. Judge Cabiness told Inv. Oliver to contact CSRA Probation to see if they were going to file a motion to revoke Sasser's bond.
231. At approximately 4:00 p.m., Inv. Oliver called CSRA Probation and spoke with the secretary. The secretary notified Inv. Oliver that Katelyn Cross was

Sasser's probation supervisor but that she was not in the office that day. Inv. Oliver then asked to be put in contact with Katelyn Cross' supervisor, Amy Corcoran and left a message on her voicemail.

232. At 4:08 p.m., Amy Corcoran called Inv. Oliver back. Inv. Oliver informed her of the events that occurred at Moondoggy's Pizza. Corcoran commented to her that Sasser's still being in Glynn County at that time was a violation of his bond in and of itself. Corcoran told Inv. Oliver that she needed the police reports in order to try to revoke Sasser's bond.

233. Corcoran stated she was going to consult with the District Attorney's Office about getting Sasser's bond revoked. Inv. Oliver reported this back to Captain Tom Jump but never provided Corcoran any police reports.

234. Later that afternoon, CSRA Probation Officer Amy Corcoran spoke with Katie and was informed that she wanted to press charges against Sasser. Corcoran told Katie that she needed the police reports and/or arrest reports for CSRA Probation to move forward on a bond revocation. Katie told her that police had told her they were waiting on one more interview before arresting Sasser. Corcoran called Sasser twice that day, but he didn't answer either call. She had told him he didn't need to download the electronic monitoring app as required by the Court, so she had no idea where he was.

235. At 4:15 p.m., Inv. Oliver interviews Chris Pearson who confirmed Katie's story including his making a gesture with his hand like a gun.

236. The Glynn County Police Department took no action to secure warrants for Sasser's arrest.

237. Sasser continued to be apprised of the state of the investigation and information by Officers that had access to the information in real time and as it was entered into their case management system.

The murder of Katie Sasser and John Hall – June 28, 2018

238. On June 28th, 2018 at approximately 9 a.m., CSRA Probation Officer Amy Corcoran called the Brunswick Judicial Circuit District Attorney's Office regarding revoking Sasser's bond pursuant to a reported incident that occurred at Moondoggy's Pizza on June 26, 2018.

239. In that conversation, Spaulding advised Corcoran that she should try to coordinate a date with the court to schedule a bond revocation hearing for Sasser.

240. At 9:30 a.m., CSRA Probation Officer Amy Corcoran spoke with Glynn County Police Department Inv. Oliver while in Magistrate Court and asked if there were going to be any warrants for Sasser. Inv. Oliver told Corcoran that at that time, there weren't going to be any warrants, and that they didn't think they had enough to support an aggravated stalking charge.

241. In that same conversation, Amy Corcoran told Inv. Oliver that they would not be able to revoke Sasser's bond unless new charges were filed against him.

242. And so, at 9:30 a.m., on June 28, 2018, Inv. Oliver knew that she and Tom Jump were the critical decision makers with the means, information and opportunity to do something about Sasser having firearms, stalking Katie, threatening Katie, and other violations of law. Both failed to act.

243. Furthermore, no one at the Glynn County Police Department warned Katie that no action was being taken about Sasser and that he was going to remain at large and dangerous.

244. At that moment in the well of the Magistrate Court room, 9:30 a.m. on Thursday June 28, 2018, and at the end of that conversation between Inv. Oliver and Amy Corcoran, Inv. Oliver was aware that no official action to arrest, apprehend, or revoke Sasser's bond to take him into custody was going to take place because she and Tom Jump decided not to take action.

245. A few minutes later at 9:45 a.m., Sasser finally responded to Joanna's question as to why Sasser wanted to know where Hall was on June 27, 2018 (see ¶226). Sasser texted her back, "I'm sure you know why. PRINCIPAL."

246. At 10:48 a.m., Sasser views the Benelli USA web page, via his cellular telephone.

247. At 10:56 a.m., Sasser views the Benelli USA web page and a Life insurance web page, via his cellular telephone.

248. At 12:08 p.m. and 2:17 p.m., Sasser called Candice Jones, co-owner of Brunswick Memorial Park Cemetery and Funeral Home. Sasser wanted to pre-pay for his cremation and funeral arrangements. Sasser informed that he was going out of state and eventually overseas with work, and he didn't want his son, Bryce Sasser, to have to worry if something were to happen to him.

249. At 1:00 p.m., Inv. Oliver informed Captain Tom Jump that CSRA Probation was not going to move to revoke bond because the Glynn County Police Department was not going to charge Sasser with any crimes.

250. At 1:23 p.m., Sasser called his mother, Mary Hamby. Location data from his cellphone shows that he was traveling east towards Tallahassee, Florida. At 2:42 p.m. Sasser and his mother talk again, and Sasser informs her that he wants to be cremated and that he had already paid for the funeral. Location data from Sasser's phone shows that he was traveling north from the Tallahassee area back towards Georgia.

251. At some point in the afternoon of June 28, 2018, Assistant Chief Scott asked Officer Dustin Davis if he could meet with him, Chief Powell, and Captain Tom Jump at the headquarters of the Glynn County Police Department.

252. Officer Davis was advised at that time that it was believed by Chief Powell, Assistant Chief Brian Scott and Captain Tom Jump that Sasser was violating his bond and had committed the offense of stalking. He was not directed to swear out an arrest warrant in Glynn County Magistrate Court or take any action to apprehend Sasser. Instead, he was asked if he could go out on the morning of June 29, 2018, to see if he could rig up a hidden camera outside of Katie's house to see if they might be able to catch Sasser lurking around on camera.

253. At 4:00 p.m., Katie left work at J & J Tire and went to her mother, Debra Gann's, residence in Brunswick, Georgia.

254. At 4:03 p.m., Sasser purchased a Benelli Shotgun and ammunition from T3 Outdoors Inc. in Valdosta, Georgia. Sasser lied on the purchasing form and answered "no" to the questions "have you ever been adjudicated as a mental defective OR have you ever been committed to a mental institution," and "are you

subject to a court order restraining you from harassing, stalking, or threatening your child or an intimate partner or child of such partner."

255. At 4:21 p.m., Sasser called David James; James did not answer. Location data from Sasser's cellular telephone records indicate that Sasser was travelling away from Valdosta, Georgia, traveling east on Highway 84 towards Glynn County.

256. At 4:26 p.m., Sasser called David Culpepper for approximately 20 minutes. During this call, Sasser made comments to him that John Hall was ruining people's lives, that somebody needed to stop him, and that "one day someone's gonna do something."

257. At 5:00 p.m., Debra Gann, Katie, and R.S. go to Katie's apartment to pack clothes for R.S.'s trip with Debra to Daytona. Katie told Debra that she was not going to do much over the weekend because she had to work Saturday. Debra and R.S. left Katie's apartment shortly thereafter. This was the last time Debra and R.S. ever saw Katie.

258. At 5:15 p.m., Officer Yarborough got a call from Sasser asking for help locating John Hall via the police system because he "wanted to teach that mother fucker about principles." Although Yarborough claims that he didn't run the search because he was afraid there would be a record of his assistance maintained by the system, he didn't notify anyone.

259. At 6:00 p.m., Lori Mills, a neighbor of John Hall, recalled seeing a silver Toyota pick-up truck driving onto Tolomato Island as she was exiting her neighborhood.

260. Yarborough received a second call from Sasser at 7:20 p.m. requesting help finding John Hall. Yarborough claims to have refused again for the same reasons. In this same call, Yarborough asked Sasser where he was and Sasser claimed to be outside a Casino in Biloxi, but Yarborough didn't believe him because Sasser was unable to tell him the name of the casino. It was at this time that Yarborough realized that Sasser had "lost all hope," yet he did nothing to alert Katie, John Hall, or law enforcement of his fears and Sasser's repeated attempts to locate Hall's residence. Location data from Sasser's cellphone indicate that he was in Brunswick, Georgia at the time of the call.

261. At 8:27 p.m., Jarratt Sanford calls Sasser. Sasser told Sanford "you know I'm a man of principle," and he was very upset regarding seeing Katie and John Hall at Moondoggy's. Sasser stated that in his mind, he thought about going to John Hall's residence, knocking on his door, and telling his wife what Hall was doing.

262. At 8:40 p.m., Cade Durrence, neighbor of Hall and resident of Tolomato Island, Darien, Georgia, saw a silver Toyota pick-up truck parked near his residence.

263. Between 9:15 p.m. and 9:42 p.m., Bryce Sasser called Ashley Newton, Sasser's sister, and asked if she had seen Sasser. Bryce called Sasser 7 times and received no answer. Bryce reportedly questioned if Sasser had been back to his residence in Brunswick, Georgia because he had found a quantity of money and Sasser's watch next to the bed.

264. Sometime shortly after 9:00 p.m., Sasser knocked on Hall's door and then hid in the bushes. Hall, apparently fearing it might be Sasser, exited his house through his side door and walked around to the front of his house. When he got to the front of his house, he saw two of his neighbors standing outside and asked them who rang his doorbell.

265. His neighbors then saw Sasser jump out from behind some bushes and fire four 12-gauge shotgun shells into Hall's chest. The neighbors then witnessed Sasser kick the front door in to Hall's house and enter the house.

266. Sasser then proceeded upstairs to Hall's bedroom where Katie was hiding in a locked bathroom. Sasser then kicked the bathroom door in, grabbed Katie by the hair, and dragged her to the bed where he threw her face down. Katie, while crying, begged Sasser to think about his son and his family and not to kill her. Sasser ignored her pleas and executed her with one single shotgun blast to the back of her head. Sasser then walked downstairs, exited the residence and told Hall's neighbors "this is what happens when you sleep with another man's wife."

267. At 9:39 p.m. McIntosh County 911 is called regarding shots fired on Mission Drive on Tolomato Island, Darien, McIntosh County, Georgia.

268. At 9:44 p.m., Sasser called Bryce Sasser. Sasser told Bryce, "Its done bud, its done," and "I killed them, I killed them both." Bryce Sasser asked Sasser what he was going to do now, and Sasser replied, "do what I gotta do." Location data from Sasser's cellphone indicated that Sasser was near Tolomato Island and Hall's residence.

269. From approximately 9:40 p.m. through 10:24 p.m., Sasser led multiple law enforcement agencies on a chase that concludes in the driveway of his home in Brunswick, Georgia.

270. Just prior to Sasser committing suicide, he spoke to McIntosh County 911 Director Vicki Naugle. This was Sasser's last outgoing call from his cellular telephone. During the call, Sasser, in an apparent attempt to escape, told Naugle that he was at the McIntosh County Sheriff's Office Jail to turn himself in.

271. Naugle communicated with McIntosh County 911 and told them to call off the chase as Sasser was at the jail. McIntosh authorities then informed Naugle that Sasser was not, in fact, at the jail. During the call, Sasser stated, "it was the principle of things," and the last thing he said was, "it's over."

272. Sasser ultimately pulled his vehicle into the driveway of his residence in Brunswick, Georgia. From 10:24 PM on June 28 until early Friday morning on June 29, Sasser's vehicle remained under surveillance by multiple law enforcement personnel until Glynn County SWAT Team approached, utilized gas canisters, and eventually discovered that Sasser was dead from a single gunshot wound to the chest. He was pronounced dead at 4:57 a.m.

273. Chief Powell, Assistant Chief Brian Scott, Lieutenant Tom Jump, Lieutenant Scott Jackson, Resden Talbert, Hank Scott, Heather Savage, Kevin Yarborough, and all other managers and officers, known and unknown, that assisted Sasser by providing him information, computer data, intelligence and otherwise leaked information, including but not limited to statements made by Hall and Katie and information about the Glynn County Police Department's

investigation into felony offenses committed by Sasser on June 26, 2018

Committed the crime of Computer Access Protection in violation of O.C.G.A § 16-9-93 and Violation of Oath of Office in violation of O.C.G.A § 16-10-1.

274. Kevin Yarborough, All Officers and law enforcement personnel, known and unknown, that were contacted by Sasser and asked for assistance in finding the whereabouts and/or other information about Katie and Hall, and failed to document or notify their command, the police, the Sheriff, the Courts, CSRA probation and/or Katie and Hall, committed the offense of Violation of Oath of Office in violation of O.C.G.A § 16-10-1.

275. All Officers and law enforcement personnel, known and unknown, that were contacted by Sasser and asked for assistance in finding the whereabouts and/or other information about Katie and Hall, and gave him assistance and information while he committed and planned his crimes and violated his bond, violated their Oath of Office in violation of O.C.G.A § 16-10-1.

276. Chief Powell, Assistant Chief Brian Scott, Lieutenant Tom Jump, Lieutenant Scott Jackson, Resden Talbert, Hank Scott, and officers, known and unknown, that participated in the decision making process of whether or not to charge Sasser with Terroristic Threats, Stalking, Aggravated Stalking, Violation of Protective Orders or any other, Charging Decisions, and Evidence Collection and Preservation committed the offenses of Tampering with Evidence in violation of O.C.G.A § 16-10-94, False Statements and Writings in violation of O.C.G.A § 16-10-20, Improperly Influencing a Police Officer in violation of O.C.G.A § 16-10-5, Violation of Oath of Office in violation of O.C.G.A § 16-10-1, Hindering

the Apprehension or punishment of a Criminal in violation of O.C.G.A § 16-10-50, and Influencing Witnesses in violation of O.C.G.A § 16-10-93 when they instructed the officers under their command to not charge Sasser for known crimes and failed to provide CSRA probation or the judiciary with police reports and evidence of probable cause to arrest Sasser for Terroristic Threats, Stalking and Aggravated Stalking when same reports and evidence was in their possession.

277. These criminal acts and negligence of the Glynn County Police Department and were the proximate cause of Katie and Hall's murder.

CAUSES OF ACTION

Count 1 - Racketeer Influenced and Corrupt Organizations Act

278. Plaintiff hereby incorporates all allegations and statements of fact from the "GENERAL ALLEGATIONS" section.

279. The Glynn County Police Department is a governmental entity of the Glynn County government and constitutes a licit enterprise that is purposed to protect and serve the people of Glynn County by enforcing the laws of the State of Georgia, the United States and upholding the Constitution.

280. However, that enterprise has engaged in a pattern of racketeering activity in furtherance of one or more incidents, schemes, or transactions that have the same or similar intents, results, and accomplices.

281. This racketeering activity is not an isolated event, and the activity is related by distinguishing characteristics of greed, self-dealing and self-preservation for the benefit of the corrupt at the expense of honest police officers, victims, justice and the Constitution.

282. The methods of commission establish a corrupt pattern aimed at protecting and promoting police officers regardless of their misconduct while sidelining and corrupting good officers.

283. This reckless abandon of the rule of law harms the public, undermines our justice system, and violates rights of the victims of these criminal acts.

284. On September 9, 2019, the Glynn County Grand Jury issued a special presentment to the Judges of the Brunswick Judicial Circuit wherein they declared, “There is an ongoing culture of cover-up, failure to supervise, abuse of power and lack of accountability within the administration of the Glynn County Police Department.”

285. Further, the Grand Jury called for policies to be enacted within the Glynn County Police Department to: 1) address the failure of supervisors to document and investigate allegations of misconduct by Glynn County employees, 2) address actions by supervisors to retaliate against Glynn County employees who have cooperated or provided truthful information in investigations into allegations of misconduct, 3) to protect Glynn County employees who have cooperated or provided truthful information in investigations into allegations of misconduct, 4) to ensure that County Police Officers prepare reports in a timely and manner and include all relevant information.”

286. Finally, the Grand Jury called for a public vote on whether to consolidate the Glynn County Police Department into the Sheriff’s Office because of the ongoing problems within the enterprise.⁴

⁴ This call for Consolidation to fight corruption and problems within the police department was also made in 2016 by the Grand Jury empaneled at that time.

287. The Plaintiffs stand with the Grand Jury and the public in demanding an end to this corruption.

288. It has become evident that the Glynn County Police Department has engaged in multiple acts of racketeering activity within the past four years, including but not limited to, Providing False Statements and Writings, Tampering with Evidence, Threatening and Influencing Witnesses, Obstruction of Justice, Violations of Computer Access Protection laws, Theft by Extortion, Hindering Apprehension and Punishment of Criminals, Bribery, Violation of Oath of Office, Influencing Legislative Action, Compounding of Crime and Violations of the Street Gang Terrorism and Prevention Act.

289. While most Glynn County Police Officers honorably serve this community, the corruption of a few has tainted the department from the top down and the stench of nepotism has permeated into the ranks.

290. The public trust has been violated and respect for the county police has diminished with the slow creep of incremental and deliberate corruption.

291. The fact is that the Glynn County Police Department is in crisis, it has been for years and people are dying as a result.

292. Not all of the corrupt actors are readily identifiable and may not be discovered even in pursuit of this litigation. The thin blue line has been eroded and chaos has infected order.

293. According to an official statement by Alan Ours on November 8, 2019, “the Glynn County Commissioners are accountable for the actions of the Glynn County Police Department.”

294. The County Commission and the County Manager have abdicated their duties with respect to oversight of this corrupt organization, blindly endorsing the leadership of Chief Powell and his loyal managers within the Glynn County Police Department.

295. The public statement by Alan Ours issued on November 8, 2019 in support of Chief Powell and the leadership structure as well as public statements by County Commissioners have made it clear that they will not take action on behalf of their constituents or provide the public with anything other than misleading and incorrect information.

296. All citizens of this County support law enforcement; but we do not support criminal activity at taxpayer expense.

297. This feckless County management has embraced the corruption and abdicated policy into the hands of Chief Powell and his henchmen.

298. The integrity of Law Enforcement in Glynn County must be restored and entrusted into the care and control of our Constitutional law enforcement officer and duly elected Sheriff.

299. The examples of racketeering activity already outlined in the “GENERAL ALLEGATIONS” section of this complaint have a nexus with the murder of Katie and Hall in that the described criminal activity is the proximate cause of her death.

300. Some of the examples of racketeering activity that will be outlined in this Racketeering count do not have a nexus with the murder of Katie and Hall, but do show, along with other acts involving and leading up to the murder, a pattern of racketeering activity that cannot be ignored any longer.

301. The present state of the Glynn County Police Department is in disrepute as described below:

- a) Officers or the Glynn Brunswick Narcotics Enforcement Team (“GBNET”) having sexual relationships with confidential informants;
- b) Extra-jurisdictional operations and GBNET and abuse of police power;
- c) Hindering the apprehension, aiding and abetting of criminals;
- d) Cover-up of improper and illegal acts of Glynn County PD officers;
- e) Conducting an illegal Florida operation resulting in the unlawful arrest of Katelyn Jones and the death of Stephen DeLoach.

302. This pattern of misconduct is well documented in two recent Superior Court cases: State v. Whittle, CR1500525 and CR190027; and State v. Jones, CR1800645 and CR1800151. It has also resulted in overturned convictions, suppression of evidence and the release of criminals onto our streets.

303. In summary of this Racketeer Influenced and Corrupt Organizations Act count, and with respect to *known* racketeering activity and corrupt practices engaged upon by officers within the Glynn County Police Department in the past four years, this complaint includes the following examples but is certainly not limited to the following predicate acts:

- a) **FALSE STATEMENTS AND WRITINGS** (O.C.G.A. § 16-10-20)

I. Chief Powell committed the offense of False Statements and Writings when on or about February 20, 2018, he did conspire,

cause and direct Officer Yarborough to omit material information from his official report regarding the circumstances leading up to the arrest of Katelyn Jones and the car wreck that caused the death of Stephen Deloach, for the purpose of concealing unlawful activities and GBNET involvement in a matter within the jurisdiction of the Glynn County Police Department and the State of Georgia.

II. Assistant Chief Brian Scott committed the offense of False Statements and Writings when on or about February 20, 2018, he did conspire, cause and direct Officer Yarborough to omit material information from his official report regarding the circumstances leading up to the arrest of Katelyn Jones and the car wreck that caused the death of Stephen Deloach, for the purpose of concealing unlawful activities and GBNET involvement in a matter within the jurisdiction of the Glynn County Police Department and the State of Georgia.

III. Officer Kevin Yarborough committed the offense of False Statements and Writings when on or about February 20, 2018, he did omit material information from his official report regarding the circumstances leading up to the arrest of Katelyn Jones and the car wreck that caused the death of Stephen

Deloach, for the purpose of concealing GBNET involvement in a matter within the jurisdiction of the Glynn County Police Department and the State of Georgia.

IV. Lieutenant Scott Jackson committed the offense of False Statements and Writings when on or about May 13, 2018, he wrote a false report about what occurred at a domestic violence incident between Lieutenant Sasser and Katie, for the purpose of concealing the crimes of Cory Sasser, a matter that fell within the jurisdiction of the Glynn County Police Department and the State of Georgia.

V. Investigator Oliver committed the offense of False Statements and Writings when she created a series of police reports covering her actions from June 26-June 28, 2018 and stated that there was no probable cause to arrest Sasser for his actions in the days leading up to Katie's murder.

b) TAMPERING WITH EVIDENCE (O.C.G.A. § 16-10-94)

I. Chief Powell, Assistant Chief Brian Scott, Captain Tom Jump, Lieutenant Scott Jackson, Resden Talbert and Hank Scott and all other managers and officers, known and unknown, that participated in the decision making process to release Sasser's guns to Bryce Sasser on

May 22, 2018 at Sasser's request, committed the offense of Tampering With Evidence, when with the intent to obstruct any future prosecution of Sasser for the crimes of May 16-17, they failed to inventory, take into custody, take into evidence and ultimately released the firearms to Sasser.

II. Chief Powell, Assistant Chief Brian Scott, Captain Tom Jump, Parker Marcy, Justin Floyd and others, known and unknown, committed the offense of tampering with evidence when they concealed from the Court and prosecutors' evidence of felonies and other criminal conduct by Lieutenant Sasser on May 13, 2018.

c) **WITNESS INTIMIDATION;** Violation of O.C.G.A. § 16-10-32

I. Chief Powell, Assistant Chief Brian Scott, Captain Tom Jump, Lieutenant Haney, and all other managers and officers, known and unknown, that participated in the decision and action to stop Colonel Danny Lowe of the McIntosh Sheriff's Office twice on the same day in January 2019 and harass on the side of the road in retaliation for his complaint about unlawful extra-jurisdictional police

activities of the Glynn County Police committed the offense of Witness Intimidation.

II. Chief Powell, Assistant Chief Brian Scott, Captain Tom Jump, Lieutenant Haney, and all other managers and officers, known and unknown, that participated in the decision and action to threaten and coerce Officer John Simpson to change his testimony in the Whittle Proceedings committed the offense of witness tampering.

III. Chief Powell, Assistant Chief Brian Scott, Captain Tom Jump, Lieutenant Haney, and all other managers and officers, known and unknown, that participated in the decision and action to retaliate and spread disinformation about Mike Lawson in retaliation for his testimony in the Whittle proceedings committed the offense of witness tampering.

d) INFLUENCING WITNESSES; Violation of O.C.G.A. § 16-10-93

I. Chief Powell, Assistant Chief Scott, and Lieutenant Haney used intimidation and threats to persuade individuals by means of corruption to influence, delay or prevent testimony and otherwise hindered, delayed and prevented communication to law enforcement,

prosecuting attorneys and Judge Lane in the court proceedings related to State v. Whittle.

a) these Officers conspired and instructed other officers in the department not to cooperate with the GBI

b) these Officers conspired and caused and attempted to cause officers to change their sworn testimony to promote their own interests

c) these officers conspired and caused officers to conceal material facts from the Court, Prosecutor and the public

d) These officers conspired and caused officers under their command to delay and hinder the Court.

e) **OBSTRUCTION OF JUSTICE**; Violation of O.C.G.A. § 16-10-24

I. Lieutenant Haney committed obstruction of justice when he directed fellow officers not to cooperate with a police corruption probe led by the Georgia Bureau of Investigation in January of 2018.

II. Chief Powell, Assistant Chief Scott, Captain Tom Jump, Lieutenant Jackson, Stephanie Oliver and others, known and unknown, obstructed justice by failing to apprise the Glynn County Magistrate Court of known facts, and by withholding police reports and

information from CSRA probation on June 27 and 28, 2018.

III. Chief Powell, Assistant Chief Scott, Captain Tom Jump, Lieutenant Jackson, Stephanie Oliver and others, known and unknown, obstructed justice by hindering the ability of CSRA Probation's ability to take out a bond revocation motion in Glynn County Magistrate Court, by withholding police reports and information from CSRA probation on June 27 and 28, 2018.

IV. Officer Savage, Officer Yarborough, and others, known and unknown, who accessed the Spillman case management system between May 13, 2018 and June 29, 2019 and fed Sasser information about police investigations into his criminal activity and told him about witness information obstructed justice.

f) **COMPUTER ACCESS PROTECTION CRIMES;** Violation of O.C.G.A. § 16-9-93

I. Officer Savage, Officer Yarborough, and others, known and unknown, who accessed the Spillman case management system between May 13, 2018 and June 29, 2019 and fed

Sasser information about police investigations into his criminal activity and told him about witness information committed Computer Access Protection Crimes in violation of State Law.

g) **THEFT BY EXTORTION;** Violation of O.C.G.A. § 16-8-16

I. Officers Justin Floyd and Parker Marcy committed the offense of theft by extortion when on or about the 13 day of May, 2018, they did obtain car keys to Katie's Chevy Tahoe by withholding police action and making it known that the only way Sasser was going to leave her home and neighborhood was if he left in Katie's Tahoe.

II. Lieutenant Jackson, Justin Floyd and Parker Marcy committed the offense of criminal attempt to commit theft by extortion, when they withheld police action and violated the written policies of the Police Department while demanding jewelry from Katie on behalf of Lieutenant Sasser.

h) **HINDERING APPREHENSION AND PUNISHMENT;**

Violation of O.C.G.A. § 16-10-50

I. Lieutenant Scott Jackson, Officer Parker Marcy and Officer Justin Floyd committed the offense of hindering the apprehension and punishment of a criminal when on May 13,

2018; they allowed Lieutenant Sasser to leave the scene of a domestic violence call without arresting him and concealed evidence of felony offenses that occurred.

II. Chief Powell and Assistant Chief Brian Scott committed the offense of hindering the apprehension and punishment of a criminal when on May 15, 2018; they decided to only take out criminal arrest warrants for misdemeanor offenses instead of known felony offenses and concealed evidence of same felony offenses.

III. Chief Powell, Assistant Chief Brian Scott, Lieutenant Tom Jump, Lieutenant Scott Jackson, Resden Talbert and Hank Scott and all other managers and officers, known and unknown, that participated in the decision making process to seek a search warrant without outlining probable cause to the Magistrate Court on May 21, 2018, hindered the apprehension and punishment of a criminal , when with the intent to obstruct any future prosecution of Sasser for the crimes of May 16-17, they failed to provide the Court with a proper warrant affidavit and failed to take corrective action of their defective application when notified of said deficiencies by the Court.

IV. Chief Powell, Assistant Chief Brian Scott, Lieutenant Tom Jump, Lieutenant Scott Jackson, Resden Talbert and Hank Scott and all other managers and officers, known and unknown, that participated in the decision making process to release Lieutenant Sasser's guns and vehicle on May 22, 2018, hindered the apprehension and punishment of a criminal, when with the intent to obstruct any future prosecution of Sasser for the crimes of May 16-17, 2018 they failed to take possession, inventory, or otherwise preserve evidence of his crimes and released his firearms to Bryce Sasser at Lieutenant Sasser's request.

V. Officer Savage, Officer Yarborough, and others, known and unknown, who accessed the Spillman case management system between May 13, 2018 and June 29, 2019 and fed Sasser information about police investigations into his criminal activity and told him about witness information hindered the apprehension of a criminal.

- i) **OFFICERS IMPROPERLY INFLUENCING OFFICERS:** Violation of O.C.G.A. § 16-10-5 (b)

- I. *Lieutenant Scott Jackson improperly influenced other officers on May 13, 2018, when he Ordered them to not arrest Lieutenant Sasser for his crimes.*
- II. *Chief Powell improperly influenced other officers on May 15, 2018, when he Ordered officers to not arrest Lieutenant Sasser for known felony offenses.*
- III. *Chief Powell, Assistant Chief Brian Scott and Captain Tom Jump improperly influenced Officers against charging Sasser with serious offenses of Aggravated Assault on a Police Officer and Terroristic Threats and Acts that he committed during the May 16-17 standoff with police.*
- IV. *Chief Powell, Assistant Chief Brian Scott and Captain Tom Jump improperly influenced Officer Stephanie Oliver to not file arrest warrants against Sasser on June 26, 27 and 28 2018 for known felony offenses.*
- V. *Officer Cassada improperly influenced Officers when he intervened and stopped the arrest of a drug dealer he was having sexual relations with and influenced another officer to leave her name off a*

*list being prepared by Glynn County Police for the
DEA.*

VI.

j) **BRIBERY**; Violation of O.C.G.A. § 16-10-2

I. Upon information and belief, officers known and unknown participated in various bribery and extortion schemes in order to obtain items of value, such as perjured testimony, police protection, immunity from arrest and compliance in criminal conspiracies.

k) **VIOLATION OF OATH OF OFFICE**; Violation of O.C.G.A. § 16-10-1

I. Officer Cassada violated his oath of office when he smoked methamphetamine and engaged in sexual intercourse with a confidential informant on November 15 – November 16, 2017.

II. Officer Cassada violated his oath of office when he used engaged in sexual intercourse with a confidential informant under the Sydney Lanier bridge in 2017.

- III. *Lieutenant Jackson, Parker Marcy and Justin Floyd violated their oath of office when they failed to arrest Lieutenant Sasser and participated in Sasser's scheme to extort a Chevy Tahoe from Katie on May 13, 2018.*
- IV. *Sergeant Gregory and Lieutenant Smith violated their oath of office when they failed to make any written reports or document misconduct by Officer Cassada when it was brought to their attention on November 9, 2017.*
- V. *Captain Hassler and Lieutenant Haney violated their oath of office when in November of 2017, they failed to make any written reports or document misconduct by Officer Cassada when it was brought to their attention.*
- VI. *Lieutenant Haney violated his oath of office when he advised and directed fellow officers not to cooperate with the Georgia Bureau of Investigation when they were conducting a lawful investigation into police corruption in January of 2019.*

VII. *Lieutenant Jackson violated his oath of office when he directed officers not to arrest Sasser and wrote a false police report claiming there was no probable cause for arrest and no evidence of domestic violence on May 13, 2018.*

VIII. *Chief Powell, Assistant Chief Brian Scott, Lieutenant Tom Jump, Lieutenant Scott Jackson, Resden Talbert and Hank Scott, and all other managers and officers, known and unknown, that participated in the May 16-17, 2018 decision making process to not take out arrest warrants for Lieutenant Sasser until May 21, 2018, violated their Oath of Office.*

IX. *Chief Powell, Assistant Chief Brian Scott, Lieutenant Tom Jump, Lieutenant Scott Jackson, Resden Talbert and Hank Scott and all other managers and officers, known and unknown, that participated in the decision making process to seek a search warrant without outlining probable cause to the Magistrate Court on May 21, 2018, Violated their Oath of Office, when with the intent to obstruct*

any future prosecution of Sasser for the crimes of May 16-17, they failed to provide the Court with a proper warrant affidavit and failed to take corrective action of their defective application when notified of said deficiencies by the Court.

X. *Chief Powell, Assistant Chief Brian Scott, Lieutenant Tom Jump, Lieutenant Scott Jackson, Resden Talbert and Hank Scott and all other managers and officers, known and unknown, that participated in the decision making process to release Sasser's guns to Bryce Sasser on May 22, 2018 at Sasser's request, Violated their Oath of Office, when with the intent to obstruct any future prosecution of Sasser for the crimes of May 16-17, they failed to inventory, take into custody, take into evidence and ultimately released the firearms to Sasser.*

XI. *Officer Savage, Officer Yarborough, and others, known and unknown, who accessed the Spillman case management system between May 13, 2018 and June 29, 2019 and fed Sasser information about*

police investigations into his criminal activity and told him about witness information violated their oath of office.

l) **INFLUENCING LEGISLATIVE ACTION;** Violation of O.C.G.A. § 16-10-4

I. *Upon information and belief, officers known and unknown participated in various schemes and activities to unlawfully influence legislative action within the Glynn County Government, and specifically, the Glynn County Commission, in order to defeat the passage of any legislation or political activity that would end corruption and consolidate law enforcement under the Sheriff.*

m) **AND COMPOUNDING CRIMES;** Violation of O.C.G.A. § 16-10-90

I. *Upon information and belief, officers known and unknown received benefits in exchange for participation in various schemes and activities where they promised not to aid in the prosecution of Cassada, Yarborough and other corrupt officers when legal proceedings were underway.*

Count 2 – Negligence of the Glynn County Police Department

304. Plaintiff incorporates all facts and allegations already stated in this complaint, and shows that the Glynn County Police Department and the named officers were negligent and their failure to meet their obligations was the proximate cause of Katie's death

305. With respect to discretionary duties, The Glynn County Police Department and its Officers acted with actual malice, failing in their respective duties and their negligence in this regard is the proximate cause of Katie's death.

306. With respect to ministerial duties, The Glynn County Police Department and its Officers failed in their respective duties and their negligence in this regard is the proximate cause of Katie's death.

307. An employer is bound to exercise ordinary care in the selection of employees and not to retain them after knowledge of incompetency.

308. Additionally, a defendant employer has a duty to exercise ordinary care not to hire or retain an employee the employer knew or should have known posed a risk of harm to others when it is reasonably foreseeable from the employee's tendencies or propensities that the employee could cause the type of harm sustained by the plaintiff.

309. The Glynn County Police Department and the management structure failed to exercise ordinary care when they retained and promoted Lieutenant Cory Sasser after it was apparent he was a danger to other officers and the public.

310. The Glynn County Police Department and the management structure acted with actual malice in many of these decisions.

311. Those Officers and the Department, including but not limited to, Chief Powell, Assistant Chief Brian Scott and Lieutenant Jackson knew that Lieutenant Sasser posed a risk to the public and others.

312. Their failure to exercise due care placed him in a position to be protected and aided by the Department during his crimes, and their negligence in this regard is the proximate cause of Katie's death.

313. One who undertakes, gratuitously or for consideration, to render services to another which he should recognize as necessary for the protection of a third person or his things, is subject to liability to the third person for physical harm resulting from his failure to exercise reasonable care to protect his undertaking, if (a) his failure to exercise reasonable care increases the risk of such harm, or (b) he has undertaken to perform a duty owed by the other to the third person, or (c) the harm is suffered because of reliance of the other or the third person upon the undertaking.

314. There is no question, as outlined in painful and extensive detail above, that the Glynn County Police Department and its Officers failed to exercise reasonable care in protecting Katie from the depraved animal that was hunting her down.

315. Furthermore, Katie relied on their protection, and these Officers increased the risk to her life by helping Sasser repeatedly and in many different situations over the last days of her life.

316. The Glynn County Police Department, with actual malice, acted and in many cases willfully failed to act; and its Officers negligence in this regard is the proximate cause of Katie's death.

317. The Glynn County Police Department failed to follow state law, failed to properly document family violence, failed to make complete and accurate reports, failed to preserve evidence, failed to comply with State and County policy, and otherwise failed to exercise reasonable care in their operations.

318. With respect to discretionary duties, The Glynn County Police Department and its Officers acted with actual malice, failing in their respective duties, and their negligence in this regard is the proximate cause of Katie's death.

319. With respect to ministerial duties, The Glynn County Police Department and its Officers failed in their respective duties and their negligence in this regard is the proximate cause of Katie's death.

320. Police Departments and Officers that negligently give false information to another are subject to liability for physical harm caused by action taken by the other in reasonable reliance upon such information, where such harm results (a) to the other, or (b) to such third persons as the actor should expect to be put in peril by the action taken.

321. These failures, again, give rise to a cause of action for negligence in that the Glynn County Police Department and the named Officers failed to exercise ordinary care and this failure is the proximate cause of Katie's death.

322. The Glynn County Police Department and its Officers were negligent and they are liable for her death.

Count 3 - Public Duty Doctrine (GCPD)

323. Defendants had a special relationship with Katie giving rise to a duty to protect her during all relevant times.

324. Specifically, Defendants made express and explicit assurances and actions were made towards Katie that it would protect her from harm by Sasser.

325. The Glynn County Police Department as well as the Management and Officers assigned to her case were aware that inaction could lead to harm and that Sasser was dangerous and unstable.

326. Katie relied on the Police Department's assurances that they would protect her from Sasser.

327. Defendants had specific knowledge, which was not known to Katie, that Sasser was actively attempting to locate her and John Hall, and that Sasser intended to physically harm them.

328. Katie justifiably and detrimentally relied on Defendant's explicit assurances.

329. Such reliance lead to her being executed by Sasser with a single shotgun blast to her head.

330. As such, Defendant Glynn County Police Department and the named Officers violated the Public Duty Doctrine and such violation proximately caused Katie's death.

Count 5 - Wrongful Death

331. At the time Katie was executed by Sasser, she was married to Sasser, and survived by her son, R.S., and her mother, Plaintiff Debra Gann, who serves as the administrator of her estate.

332. Plaintiff Gann is also the legal guardian of Katie's minor child, R.S.

333. As the guardian of R.S., Plaintiff Gann is entitled to bring this claim for the wrongful death of Katie.

334. Defendants are liable to Plaintiff for the full value of Katie's life and for Katie's physical, mental, and predeath emotional pain and suffering, apprehension of fear, loss of enjoyment of life, funeral expenses, and all other claims that survive her death, in an amount to be determined by the enlightened conscience of an impartial jury.

DAMAGES

335. Plaintiff is entitled to nominal, compensatory, special and punitive damages in an amount to be determined by the enlightened conscience of an impartial jury.

336. Defendants are liable to Plaintiff for the full value of Katie's life and for Katie's physical, mental, and predeath emotional pain and suffering, apprehension of fear, loss of enjoyment of life, funeral expenses, and all other claims that survive her death, in an amount to be determined by the enlightened conscience of an impartial jury.

337. Pursuant to the Racketeer and Corrupt Organization Act, Plaintiff is entitled to treble damages with regards to any compensatory damages.

338. Pursuant to the Racketeer and Corrupt Organization Act, Plaintiff is entitled to attorneys fees for the prosecution of this action.

339. Plaintiff is also entitled to punitive damages for Defendant's willful and wanton conduct causing Katie's horrific death as well as her physical, mental and pre-death emotional pain and suffering, apprehension of fear, loss of enjoyment of

life, and all other claims that survive her death, in an amount to be determined by the enlightened conscience of an impartial jury.

340. With respect for Plaintiff's negligent retention claims against the Glynn County Police Department, Plaintiff is entitled to punitive damages because clear and convincing evidence that the defendant's actions showed willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care which would raise the presumption of conscious indifference to consequences.

WHEREFORE, Plaintiff prays for the following relief:

- a) That summons and process issue and be served upon the named Defendants;
- b) Trial by jury;
- c) That Plaintiff be awarded nominal, compensatory, special and punitive damages in an amount determined by the enlightened conscience of the jury.
- d) Such other and further relief as this court deems just and proper.

Respectfully submitted, this 31st day of January, 2020.

/s/ Darren W. Penn

DARREN W. PENN
Georgia Bar No. 571322
darren@pennlawgroup.com
ALEXANDRA "SACHI" COLE
Georgia Bar No. 696892
sachi@pennlawgroup.com
KEVIN M. KETNER
Georgia Bar No. 418233
kevin@pennlawgroup.com

PENN LAW LLC
4200 Northside Parkway, NW
Building One, Suite 100
Atlanta, Georgia 30327
Phone/Fax: (404) 961-7655

Nathan T. Williams
Georgia Bar No. 142417
Wrix McIlvaine
Georgia Bar No. 436879

WILLIAMS LITIGATION GROUP, P.C.
Post Office Box 279
Brunswick, Georgia 31521-0279
(912) 208-3721
(912) 264-6299 facsimile

Attorneys for Plaintiff