

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

RAYNALDO MARKEITH SAMPY, JR.

Plaintiff,

vs.

CASE NO. 6:19-CV-580

**JONATHAN PRICE RABB, BRANDON
LAMAR DUGAS, IAN JAMES JOURNET,
SEGUS RAMON JOLIVETTE, MICHAEL
NICHOLAS DARBONNE, ASHER REAUX,
JORDAN KAMAL COLLA, LAFAYETTE CITY
PARISH CONSOLIDATED GOVERNMENT, and
LAFAYETTE PARISH COMMUNICATIONS DISTRICT**

Defendants.

PLAINTIFF'S SECOND AMENDED COMPLAINT

TO THE HONORABLE, THE UNITED STATES DISTRICT COURT IN AND FOR THE
WESTERN DISTRICT OF LOUISIANA, LAFAYETTE DIVISION:

INTRODUCTION

1. This case involves the unnecessary, brutal beating of a Black man. The complainant, RAYNALDO MARKEITH SAMPY, JR., seeks money damages pursuant to 42 U.S.C. §§ 1983 and 1988, the First, Fourth, and Fourteenth Amendments to the United States Constitution, and under the laws and constitution of the State of Louisiana. He brings this action against the LAFAYETTE PARISH COMMUNICATIONS DISTRICT, LAFAYETTE CITY PARISH CONSOLIDATED GOVERNMENT (hereinafter referred to as "LCG"), Officer JONATHAN PRICE RABB, Officer BRANDON LAMAR DUGAS, Officer IAN JAMES JOURNET, Officer SEGUS RAMON JOLIVETTE, Officer MICHAEL NICHOLAS DARBONNE, Officer ASHER REAUX, and Officer JORDAN KAMAL COLLA.

2. In the early morning of May 5, 2018, Mr. Sampy was sleeping in his truck in front of a convenience store when a security guard at a nearby apartment complex called 911. Although he had not seen any actual collision, the security guard reported that a Black man in a truck had driven into an ice cooler and damaged it. A steel guard directly in front of the ice cooler made any such collision a fiction. Nonetheless, when police officers arrived on the scene, rather than assess the purported damage, they approached Mr. Sampy with the presumption of guilt, swiftly resorting to violence wholly disproportionate to the situation at hand. They beat Mr. Sampy for approximately seven minutes (the “Incident”), leaving him with significant physical and emotional injuries, from which he still suffers to this day.

3. The brutalization of Black men by police is a scourge on our society.¹ Mr. Sampy seeks to address it in this instance by holding those officers sworn to serve and protect him accountable for violating his constitutional and common law rights.

4. After the Incident, Mr. Sampy was subsequently prosecuted in the City Court of Lafayette for operating a vehicle while intoxicated, first offense (“OWI”), and for simple battery of a police officer. In October 2019, Mr. Sampy was convicted after a bench trial on both charges and was sentenced to 125 days with 110 days of the sentence suspended. The City Court ordered Mr. Sampy to serve his 15-day sentence under home confinement, finding nothing “so egregious that I would not consider home incarceration under the battery.” Mr. Sampy was also ordered to

¹ See Frank Edwards, et al., *Risk of being killed by police use of force in the United States by age, race – ethnicity, and sex*, 116 PNAS 16793, 16794 (2019) (finding that Black men are 2.5 more likely than white men to be killed by law enforcement); Mark Hoekstra & Carly Will Sloan, *Does Race Matter for Police Use of Force? Evidence from 911 Calls*, NBER, Feb. 2020, <https://www.nber.org/papers/w26774>; Oliver Laughland, *US police have a history of violence against black people. Will it ever stop?*, The Guardian, Jun. 4, 2020, <https://www.theguardian.com/us-news/2020/jun/04/american-police-violence-against-black-people>.

pay an \$800 fine, perform 32 hours of community service, and serve one year of probation, which ended in October 2020.

5. Mr. Sampy's misdemeanor convictions do not justify the egregious conduct of the arresting officers. As the City Court explained, "I don't know that we've ever had a situation like this in my twenty something years that we've had to deal with a detention that got out of hand as this one did."

JURISDICTION, VENUE, AND NOTICE

6. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1343, 2201, and 2202. Mr. Sampy further invokes jurisdiction of this Court under 28 U.S.C. § 1367 to adjudicate claims arising under the laws of the State of Louisiana, including, but not limited to Article 2315, et seq, of the Louisiana Civil Code and Article I, Sections 2, 5, and 7 of the Louisiana Constitution of 1974.

7. This case is instituted in the United States District Court for the Western District of Louisiana pursuant to 28 U.S.C. §1391 as the judicial district in which all relevant events and omissions occurred and in which Defendants maintain offices and/or reside.

PARTIES

8. At all times relevant hereto, Plaintiff RAYNALDO MARKEITH SAMPY, JR. was a resident of the Western District of Louisiana and a citizen of the United States of America.

9. At all times relevant hereto, Defendant JONATHAN PRICE RABB was a citizen of the United States and a resident of the Western District of Louisiana and was acting under color of state law in his capacity as a law enforcement officer employed by the Lafayette Police Department, which is under the authority of Defendant LCG. Defendant Rabb is sued individually.

10. At all times relevant hereto, Defendant BRANDON LAMAR DUGAS was a citizen of the United States and a resident of the Western District of Louisiana and was acting

under color of state law in his capacity as a law enforcement officer employed by the Lafayette Police Department, which is under the authority of Defendant LCG. Defendant Dugas is sued individually.

11. At all times relevant hereto, Defendant SEGUS RAMON JOLIVETTE was a citizen of the United States and a resident of the Western District of Louisiana and was acting under color of state law in his capacity as a law enforcement officer employed by the Lafayette Police Department, which is under the authority of Defendant LCG. Defendant Jolivet is sued individually.

12. At all times relevant hereto, Defendant MICHAEL NICHOLAS DARBONNE was a citizen of the United States and a resident of the Western District of Louisiana and was acting under color of state law in his capacity as a law enforcement officer employed by the Lafayette Police Department, which is under the authority of Defendant LCG. Defendant Darbonne is sued individually.

13. At all times relevant hereto, Defendant ASHER REAUX was a citizen of the United States and a resident of the Western District of Louisiana and was acting under color of state law in his capacity as a law enforcement officer employed by the Lafayette Police Department, which is under the authority of Defendant LCG. Defendant Reaux is sued individually.

14. At all times relevant hereto, Defendant JORDAN KAMAL COLLA was a citizen of the United States and a resident of the Western District of Louisiana and was acting under color of state law in his capacity as a law enforcement officer employed by the Lafayette Police Department, which is under the authority of Defendant LCG. Defendant Colla is sued individually.

15. At all times relevant hereto, Defendant IAN JOURNET was a citizen of the United States and a resident of the Western District of Louisiana and was acting under color of state law

in his capacity as a law enforcement officer employed by the Lafayette Police Department, which is under the authority of Defendant LCG. Defendant Journet is sued individually.

16. Lafayette City Parish Consolidated Government, Louisiana (“LCG”), a political subdivision of the State of Louisiana within Lafayette Parish, is the entity having ultimate authority, oversight, responsibility and control over decisions affecting, and funding of, the Lafayette Police Department and its police officers, including the individually-named Defendants sued in their personal capacities. As such, the LCG is ultimately responsible for all local policies, procedures, practices, decisions and customs employed by its law enforcement officials, supervisors and officers, including the proper hiring, training and supervision of all sworn police officers acting under their authority and the color of law.

17. Lafayette Parish Communication District, Louisiana, a political subdivision of the State of Louisiana within Lafayette Parish, is the entity having ultimate authority, oversight, responsibility and control of decisions affecting, and funding of, the Lafayette Parish 911 system and its 911 dispatchers. As such, the Lafayette Parish Communication District is ultimately responsible for all local 911 dispatchers of the Lafayette Parish 911 system and the Lafayette Parish Communication District, including the proper hiring, training and supervision of all 911 Dispatchers acting under their authority and the color of law.

FACTUAL ALLEGATIONS

The Brutal Arrest of Mr. Sampy

18. During the early morning of May 5, 2018, Mr. Sampy was peacefully sleeping while seated in his (parked and turned-off) pickup truck in the parking lot of “Sid’s One Stop,” located at 803 Martin Luther King, Jr. Drive, Lafayette, Louisiana.

19. Malik Glaze, a security guard employed by J&B Security LLC, d.b.a. Signal 88 Security, while in the performance of his routine duties at nearby apartments, called 911 (Lafayette

Parish Communication District) with his cellular telephone. During the recorded call, he reported that a black male was seated in a pickup truck in front of Sid's One Stop and "appeared to have run into the ice cooler" located outside and in front of the convenience store. Mr. Glaze clarified to the dispatcher that he had not seen the vehicle hit the machine as it was parked; indeed, Mr. Glaze had not gotten out of his vehicle to examine the truck. The fact is, in parking his vehicle, Mr. Sampy did not strike the ice cooler, nor could he have. In front of the ice cooler, a yellow-painted, steel pipe guard rail stands embedded in the concrete; it is designed to protect the machine from vehicle damage. The owner of the convenience store executed an affidavit on March 15, 2019, indicating that the ice cooler was damaged before May 5, 2018. (Exhibit A.)

20. Shortly after receiving Mr. Glaze's call, the Lafayette Parish Communication District dispatcher directed officers to the scene based on the information provided by Mr. Glaze's report. Only Officer Reaux's body camera was activated, even though Lafayette Police Department policy requires officers to activate their body cameras at all times when interacting with a citizen. Officers Rabb, Dugas, Darbonne, Jolivette, Colla, and Journet all chose not to activate their body cameras.

21. The seven officers who responded to the dispatch encountered Mr. Sampy sleeping, seated upright, in his truck. The truck was parked facing the front of the convenience store. Officer Reaux's body camera video² establishes that Mr. Sampy's truck was not parked directly in front of the ice machine. The truck was not touching the ice machine. Rather, the front-driver-side bumper was parked nearest to the front-right edge of the ice machine.

² Officer Reaux's bodycam footage can be accessed online at <https://www.youtube.com/watch?v=OeM6iCRiITU>.

22. Officer Darbonne spoke to Mr. Sampy through the already open truck window, stating inaccurately that the officers had received a call from the alarm company reporting that the security camera caught Mr. Sampy's truck striking the ice machine. (In fact, Lafayette Alarm Systems confirmed in an affidavit that, while it provided electronic burglary notification systems for Sid's One Stop, it never installed or maintained any video surveillance system. (See Exhibit B.)) Mr. Sampy responded to Officer Darbonne by denying that he struck the ice machine.

23. Officer Darbonne proceeded to ask for identification and, uninvited, opened the driver's door to Mr. Sampy's truck. Still disoriented from just having been awakened, but seeking to comply with the Officer's request, Mr. Sampy reached toward his pocket to extract his driver's license. At this point, Officer Dugas immediately grabbed Mr. Sampy's arm, forcibly snatched him out of his truck—which had been modified to be raised higher off the ground than normal—and performed a straight-arm bar take-down, throwing Mr. Sampy face down onto the concrete parking lot. Mr. Sampy complained that Officer Dugas was using unnecessary and excessive force. Instead of deescalating the situation, Officers Dugas, Reaux, and Colla immediately pulled the prone Mr. Sampy's arms behind his back and handcuffed him. Mr. Sampy remained handcuffed through the remainder of the Incident.



24. Officer Darbonne was standing nearby holding a flashlight. None of the other officers—specifically, Officers Rabb, Jolivette, and Journet, who were all nearby—made any effort to intervene or to calm the other officers’ aggressive and unreasonable actions. Other than vociferously complaining about his mistreatment, Mr. Sampy did not resist the officers’ arrest.

25. After Mr. Sampy was thrown to the concrete and handcuffed outside of his truck, and as he was being dragged along the concrete to a nearby marked police vehicle, Officer Reaux began to give, but never finished giving, a *Miranda* warning to Mr. Sampy. The bodycam footage shows Mr. Sampy struggling to lift his pants over his buttocks, as they had fallen during the officers’ violent extraction and arrest.

26. Upon arrival at the police vehicle, Officer Dugas threw the handcuffed Mr. Sampy onto the hood of a nearby marked police car. Officer Dugas pinned Mr. Sampy to the hood of the police car by pressing his hand into Mr. Sampy’s neck, all while Officer Jolivette held Mr. Sampy’s left arm. The audio recording of the bodycam footage captures Officer Dugas saying that Mr.

Sampy encountered the “wrong fucking crew,” the implication being that Mr. Sampy was unlucky to be arrested by these officers because they are a particularly aggressive and violent unit.

27. In fact, Officers Dugas and Jolivette had previously been named defendants in lawsuits alleging misconduct in this District, including for unconstitutional excessive force and intentional infliction of emotional distress.³



28. After Officer Dugas finished making his “wrong fucking crew” statement, Officer Rabb abruptly pulled Mr. Sampy, who weighs approximately 150 pounds, by his legs out of the hands of Officers Dugas and Jolivette. This caused Mr. Sampy to fall face first on the concrete parking lot, as he was unable to brace his fall with his hands cuffed behind his back. His chin was split open on the concrete (subsequently requiring stitches) and his tooth was chipped. The pool

³ See *Small, et al. v. Guidroz, et al.*, No. 6:16-cv-01112-RFD-PJH (filed July 29, 2016); *Richards v. Opelousas Police Dep’t, et al.*, No. 6:13-cv-02167-RTH-PJH (filed June 28, 2013); *Ramirez v. City of Eunice, et al.*, No. 6:11-cv-01229-RTH-CMH (filed June 24, 2011).

of blood on the parking lot in front of the police car is depicted on Officer Reaux's body camera footage.

29. Even though Mr. Sampy was fully immobilized by four other officers and handcuffed with his hands behind his back, Officer Rabb claimed at the time and at trial that Mr. Sampy kicked backwards into Officer Rabb's shin. The kicking is not visible in Officer Reaux's body camera footage, and Officer Rabb testified that he suffered no visible injuries as a result of the kicking. This alleged kick was the basis for the simple battery charge for which Mr. Sampy was ultimately convicted.

30. After landing on the ground, Mr. Sampy was stunned and continued to protest Officer Rabb's actions. In the video footage, Officer Reaux is seen pushing Officer Rabb out of the way so that he can mount Mr. Sampy. Officer Reaux can be seen placing his full body weight on Mr. Sampy's left knee while Officer Rabb rests his entire body weight and knee on Mr. Sampy's neck. Screaming in pain, Mr. Sampy repeatedly begged Officer Rabb to get off of him. Officer Rabb responded by moving his knee and weight to Mr. Sampy's head, further pressing his face into the concrete. Pinned to the ground, the blood from Mr. Sampy's injuries began to pool underneath him.

31. None of the other officers standing by—Officers Dugas, Colla, Jollivette, Darbonne, and Journet—did anything to intervene or to dissuade Officers Reaux and Rabb from their violent assault of Mr. Sampy. Not a single one of them took any steps to protect Mr. Sampy from Officer Reaux and Officer Rabb's use of excessive force, despite being in a position and having a duty to do so.

32. When a fire truck drove by, Officer Reaux finally got off Mr. Sampy and started questioning him. Officer Reaux asked Mr. Sampy about the contents of a cup in his truck's center

console. Mr. Sampy replied that the cup contained “spit” and told Officer Reaux that he could “go look.” Thereupon, Officers Reaux, Darbonne, and Dugas not only checked the cup, which Mr. Sampy had consented to, but proceeded to search the entire interior of Mr. Sampy’s truck. At this point, Officer Reaux muted his body camera, so he could speak with the other Officers in private. He did not turn the sound back on again.

33. During the search of Mr. Sampy’s truck, Officer Rabb again mounted Mr. Sampy with his knees firmly planted in Mr. Sampy’s upper back. As Mr. Sampy howled again in pain and protest, Officer Dugas can be seen smiling. Mr. Sampy overheard Officer Jolivette finally tell Officer Rabb that they didn’t have anything with which to charge Mr. Sampy. In response, Officer Rabb reiterated his claim that Mr. Sampy kicked him.



34. Nowhere in the bodycam footage does any officer assert detecting an odor of alcohol from Mr. Sampy or his vehicle. Nonetheless, the arresting officers called DUI officer Robert Mitcham to the scene. Officer Mitcham’s bodycam footage recorded his initial statement that there was no odor of alcohol from Mr. Sampy. Officer Mitcham confirmed his initial

statement at trial but added that he subsequently changed his mind about smelling alcohol on Mr. Sampy's breath. Officer Mitcham confirmed there was no alcohol found in Mr. Sampy's car.

35. Several minutes after his arrival, Officer Mitcham put Mr. Sampy in his police unit and drove him to the University Hospital & Clinic for medical treatment. During the drive, Officer Mitcham gave Mr. Sampy a full *Miranda* warning. Once at the hospital, as reflected in the hospital records, Officer Mitcham offered a fabricated story to conceal the fact that the Defendant officers had caused Mr. Sampy's injuries. (Exhibit C.)

Mr. Sampy's Criminal Trial and Appeal

36. After he was discharged from the hospital, Mr. Sampy was taken to the police precinct and charged with OWI, first offense and for simple battery of a police officer. Mr. Sampy was found guilty on both counts in September 2019 after a bench trial; he was sentenced to 125 days with 110 days of the sentence suspended. The City Court ordered Mr. Sampy to serve his sentence under home confinement, finding nothing "so egregious that I would not consider home incarceration under the battery." Mr. Sampy was also ordered to pay an \$800 fine, perform 32 hours of community service, and serve one year of probation, which ended in October 2020.

37. In January 2020, Mr. Sampy appealed from his convictions, and the Louisiana Court of Appeal, Third Circuit affirmed his convictions on March 6, 2020. Mr. Sampy applied for a supervisory writ from the Louisiana Supreme Court, which denied his application on December 8, 2020.

Mr. Sampy's Continued Medical Issues and Emotional Distress

38. As a result of the Incident, Mr. Sampy received stitches on his chin. He also suffered a herniated disc and a dislocated shoulder, both of which still cause Mr. Sampy pain and limit his ability to run his own business cleaning roof gutters. Mr. Sampy also lost consciousness

for a period of time during the Incident, and he suffers from short-term memory loss as a result of the head injuries he endured when he was repeatedly slammed and pressed into the concrete and the hood of the police vehicle.

39. Even after the events that occurred on May 5, 2018, several of the officers continued to harass Mr. Sampy. For about a week after the incident, Officer Dugas would regularly pull up and stop in front of Mr. Sampy's driveway for no apparent reason. In a separate incident, Officer Reaux pulled up next to Mr. Sampy while he was driving in an apparent effort to intimidate him.

40. All of the above-described acts were done by the Defendants intentionally, knowingly, willfully, wantonly, maliciously and/or recklessly in disregard for Mr. Sampy's federally and state protected rights, and were done while acting under color of state law.

41. On information and belief, Defendant officers may also have a history of citizen complaints and/or discipline.

42. As a direct and proximate result of the wrongful conduct in which each of the Defendants engaged, Mr. Sampy has been substantially injured. These injuries include, but are not limited to, loss of federal and state constitutional rights, physical injuries, impairments and disfigurement, great pain and emotional distress, aggravation of pre-existing conditions, and ongoing special damages for medically-related treatment caused by the unconstitutional and concerted conduct of all Defendants.

43. Mr. Sampy also continues to suffer ongoing emotional distress, with significant PTSD-type symptoms, including sadness, anxiety, stress, anger, depression, frustration, sleeplessness, nightmares and flashbacks from being mistreated by law enforcement.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

42 U.S.C. § 1983 – Excessive Force in violation of the Fourth and Fourteenth Amendments (Against Defendants Rabb, Reaux, Journet, Jolivette, Colla, Darbonne, and Dugas)

44. Plaintiff hereby incorporates all other paragraphs of this Complaint as if fully set forth herein.

45. Plaintiff in this action is a citizen of the United States and all of the individual police officer Defendants to this claim are persons for purposes of 42 U.S.C. § 1983.

46. All individual Defendants to this claim, at all times relevant hereto, were acting under the color of state law in their capacity as Lafayette Police Department officers and their acts or omissions were conducted within the scope of their official duties or employment.

47. At the time of the complained of events, Plaintiff had a clearly established constitutional right under the Fourth Amendment to be secure in his person from unreasonable seizure through excessive force.

48. Plaintiff also had the clearly established constitutional right under the Fourteenth Amendment to bodily integrity and to be free from excessive force by law enforcement.

49. Any reasonable police officer knew or should have known of these rights at the time of the complained of conduct as they were clearly established at that time.

50. Defendants Reaux, Dugas, and Rabb's actions and use of force, as described herein, were objectively unreasonable in light of the facts and circumstances confronting them and accordingly violated Plaintiff's Fourth Amendment rights.

51. Defendants Reaux, Dugas, and Rabb's actions and use of force, as described herein, were also malicious and involved reckless, callous, and deliberate indifference to Mr. Sampy's federally protected rights. The force used by these Defendant officers shocks the conscience and accordingly violated Plaintiff's Fourteenth Amendment rights.

52. Defendants Reaux, Dugas, and Rabb unlawfully seized Mr. Sampy by means of objectively unreasonable, excessive physical force, thereby unreasonably depriving Mr. Sampy of his freedom.

53. The force used constituted deadly force in that it could have caused death and did cause serious bodily injury.

54. None of the Defendant officers took reasonable steps to intervene and protect Plaintiff from the objectively unreasonable and excessive force of other Defendant officers or from the excessive force of later-responding officers, despite being in a position to do so. They are each therefore liable for the injuries and damages resulting from the objectively unreasonable and excessive force of each other officer.

55. All Defendants engaged in the conduct described by this Complaint willfully, maliciously, in bad faith, and in reckless disregard of Mr. Sampy's federally protected constitutional rights.

56. They did so with shocking and willful indifference to Plaintiff's rights and their conscious awareness that they would cause Plaintiff severe physical and emotional injuries.

57. The acts or omissions of all individual Defendants were moving forces behind Plaintiff's injuries.

58. These individual Defendants acted in concert and joint action with each other.

59. The acts or omissions of Defendants as described herein intentionally deprived Plaintiff of his constitutional rights and caused him other damages.

60. These individual Defendants are not entitled to qualified immunity for the complained of conduct, as their conduct violated Mr. Sampy's constitutional rights and was objectively unreasonable.

61. As a proximate result of Defendants' unlawful conduct, Plaintiff has suffered actual physical and emotional injuries, and other damages and losses as described herein entitling him to compensatory and special damages, in amounts to be determined at trial. As a further result of the Defendants' unlawful conduct, Plaintiff has incurred special damages, including medically related expenses and may continue to incur other expenses related to further medical, and other special, damages, in amounts to be established at trial.

62. Plaintiff is further entitled to attorneys' fees and costs pursuant to 42 U.S.C. § 1988, pre-judgment interest and costs as allowable by federal law. There may also be special damages for lien interests.

63. In addition to compensatory, economic, consequential and special damages, Plaintiff is entitled to punitive damages against each of the individually named Defendants under 42 U.S.C. § 1983, in that the actions of each of these individual Defendants have been taken maliciously, willfully or with a reckless or wanton disregard of the constitutional rights of Plaintiff.

SECOND CLAIM FOR RELIEF

42 U.S.C. § 1983 – Retaliation in Violation of the First Amendment

(Against Defendants Rabb, Reaux, Journet, Jolivette, Colla, Darbonne, and Dugas)

64. Plaintiff hereby incorporates all other paragraphs of this Complaint as if fully set forth herein.

65. Plaintiff in this action is a citizen of the United States and all of the individual police officer Defendants to this claim are persons for purposes of 42 U.S.C. § 1983.

66. All individual Defendants to this claim, at all times relevant hereto, were acting under the color of state law in their capacity as Lafayette police officers and their acts or omissions were conducted within the scope of their official duties or employment.

67. At the time of the complained of events, Plaintiff had the clearly established constitutional right to be free from retaliation for the exercise of protected speech.

68. Any reasonable police officer knew or should have known of this right at the time of the complained of conduct, as it was clearly established at that time.

69. Mr. Sampy exercised his constitutionally protected right to question law enforcement and engaged in protected speech related to the constitutional rights of citizens with respect to, among other things, the use of excessive force by the police and objectionable police conduct.

70. In response to Mr. Sampy's exercise of his constitutionally protected right to question Lafayette Police officers regarding the scope of their legal authority to arrest him with violence and to continue to use violence on his person, Defendants continued to use and escalate their excessive force. This retaliatory animus was a substantially motivating factor in the excessive force used by all the Defendant officers.

71. The excessive force used against Plaintiff in retaliation for his protected speech would deter a person of ordinary firmness from continuing to engage in the protected conduct.

72. All of the Defendant officers participated in this use of force as a means of retaliating against Plaintiff for his protected speech, and none of the Defendant officers took reasonable steps to protect Plaintiff from this retaliation for the protected speech. They are each therefore liable for the injuries and damages resulting from the objectively unreasonable and conscience-shocking force of each other officer.

73. Defendants engaged in the conduct described by this Complaint willfully, maliciously, in bad faith, and in reckless disregard of Mr. Sampy's federally and protected constitutional right to free speech and protest.

74. The acts or omissions of all individual Defendants were moving forces behind Plaintiff's injuries.

75. These individual Defendants acted in concert and joint action with each other.

76. The acts or omissions of Defendants as described herein intentionally deprived Plaintiff of his constitutional rights and caused him other damages.

77. Defendants are not entitled to qualified immunity for the complained of conduct.

78. As a proximate result of Defendants' unlawful conduct, Plaintiff has suffered actual physical and emotional injuries, and other damages and losses as described herein, entitling him to compensatory and special damages, in amounts to be determined at trial. As a further result of the Defendants' unlawful conduct, Plaintiff has incurred special damages, including medically related expenses and may continue to incur further expenses related to medical and other special damages, in amounts to be established at trial.

79. Plaintiff is further entitled to attorneys' fees and costs pursuant to 42 U.S.C. §1988, pre-judgment interest and costs as allowable by federal law. There may also be special damages for lien interests.

80. In addition to compensatory, economic, consequential and special damages, Plaintiff is entitled to punitive damages against each of the individually named Defendants under 42 U.S.C. § 1983, in that the actions of each of these individual Defendants have been taken maliciously, willfully or with a reckless or wanton disregard of the constitutional rights of Plaintiff.

THIRD CLAIM FOR RELIEF
LOUISIANA TORT - INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS

(Against Defendants Rabb, Reaux, Journet, Jolivette, Colla, Darbonne, and Dugas)

81. Plaintiff hereby incorporates all other paragraphs of this Complaint as if fully set forth herein.

82. Plaintiff asserts violations of Louisiana law relative to intentional torts by the Defendant officers of the Lafayette Police Department, all of whom were acting within the course and scope of their employment by the Lafayette City Parish Consolidated Government.

83. The Defendant officers at all times relevant hereto were acting under the color of state law.

84. The acts or omissions of these Defendants, as described herein, deprived Mr. Sampy of his constitutional rights and caused him other damages.

85. As a direct and proximate result of the intentional acts of the Defendants described herein, carried out in reckless disregard, falsity and/or without sufficient factual information, Plaintiff suffered economic damage including loss of gainful employment, was caused physical injury, psychiatric distress, and continues to suffer from severe and disabling shock, distress, anguish, sorrow, depression and loss of enjoyment of life.

86. The aforesaid physical and psychological injuries sustained by Plaintiff were caused wholly by reason of the intentional, reckless and/or negligent acts of the Defendants as described herein.

87. The Defendants engaged in extreme and outrageous conduct, and acted maliciously and with specific intent to oppress and harm Plaintiff and/or with reckless disregard of the consequences of their actions and omissions, and as a result Plaintiff is entitled to damages in an amount to be proven at trial.

RESPONDEAT SUPERIOR
LOUISIANA CIVL CODE ARTICLES 2315, 2322, AND 2317.1
(Against Defendants Parish Communication District and the Lafayette City Parish Consolidated Government)

88. Plaintiff hereby incorporates all other paragraphs of this Complaint as if fully set forth herein.

89. The Defendant officers are agents, representatives, servants, and/or employees of Defendants Parish Communication District and the Lafayette City Parish Consolidated Government.

90. The damages to and the injuries of Plaintiff are a result of the sole, combined and/or solidary fault, vicarious liability, strict liability and/or negligence of Defendants and/or joint tortfeasor(s) and/or his/its/their principal(s), employer(s), agent(s), representative(s), servant(s), employee(s), associate(s), parent(s), subsidiary(ies), lessor(s), lessee(s), insured(s), and/or insurer(s) in violation of La. Civil Code Art. 2315, Art. 2322 and Art. 2317.1. As a result of the sole, combined and/or solidary fault, vicarious liability, strict liability and/or negligence of Defendants, Plaintiff suffered general and/or special and/or punitive damages, including but not limited to physical pain and suffering, mental anguish and/or distress, great inconvenience, frustration, fear, embarrassment, humiliation, loss of enjoyment of life and society, and other damages that will be shown at the trial hereof.

JURY DEMAND

91. Plaintiff requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

DAMAGES

92. Plaintiff respectfully requests all relief to which he is entitled to as a matter of law, that Defendants be held jointly, severally, and solidarily liable for all damages suffered by state and federal violations as set forth herein and as authorized by law, including but not limited to expenses incurred, attorneys' fees, costs, interest, and punitive damages, as well as all general and equitable relief pursuant to 42 U.S.C. §§ 1983 and 1988. Plaintiff is further entitled to pre- and

post-judgment interest, and costs as allowable by federal law. There may also be special damages for lien interests.

PRAYER FOR RELIEF

Plaintiff prays that this Court enter judgment for him and against each of the Defendants and grant:

- A. Compensatory and consequential damages, including damages for emotional distress, humiliation, loss of enjoyment of life, and other pain and suffering on all claims allowed by law in an amount to be determined at trial;
- B. Compensation for economic losses on all claims allowed by law;
- C. Special damages in an amount to be determined at trial;
- D. Punitive damages on all claims allowed by law against individual Defendants and in an amount to be determined at trial;
- E. Attorneys' fees and the costs associated with this action under 42 U.S.C. § 1988, including expert witness fees, on all claims allowed by law;
- F. Pre- and post-judgment interest at the lawful rate; and
- G. Any further relief that this court deems just and proper, and any other appropriate relief at law and equity.

WHEREFORE, the Plaintiff, RAYNALDO MARKEITH SAMPY, JR., respectfully requests that this Honorable Court enter judgment in his favor and against Defendants for all relief to which he is entitled as a matter of law, and that Defendants be held jointly, severally, and solidarily liable for all damages, attorneys' fees, costs, pre-judgment interest, post-judgment interest, punitive damages, as well as all general and equitable relief under federal and Louisiana law.

Dated: February 23, 2021

Respectfully Submitted,

s/Marcus B. Hunter

Janika D. Polk, T.A. (# La. Bar. No. 27608)

Lee B. Ziffer (La. Bar. No. 32783)

Marcus B. Hunter (La. Bar No. 35177)

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OF LOUISIANA

P.O. Box 56157

New Orleans, Louisiana 70156

Telephone: (917) 842-3902

Facsimile:

Nahmed@laaclu.org

Attorneys for Plaintiff Raynaldo Markeith Sampy, Jr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23rd day of February, 2021, I electronically filed a copy of the above and foregoing pleading with the Clerk of Court through use of the CM/ECF system which will send a notice of electronic filing to those who are on the list to receive e-mail notices for this case. I further certify that I served the foregoing document and notice of electronic filing by United States Mail or e-mail to any non-CM/ECF participants.

s/Marcus B. Hunter

MARCUS B. HUNTER

SIDS ONE STOP

803 Martin Luther King Junior Drive, Lafayette la

3372350647

I Sidney Williams will be unable to appear in court on March 20, 2019 due to my wife having fallen ill I have to do everything in the store at the moment and cannot afford to close my store in my place I submit this notarized letter as my testimony he also has a recording of my testimony in my place

Any damages to the ice machine on my business premises were there prior to Raynaldo Sampy being located there on May 5, 2018 I did not see any damage to his truck as it was almost a foot away when I got to my business that morning I did not receive a call from any alarm company and I did not notify any law enforcement agency to come

Signature

Witness signature

Witness Signature

Please if you have any questions or concerns contact me

Sincerely Sidney Williams

SWORN TO AND SUBSCRIBED BEFORE ME

THIS

DAY OF

15th March 2019

Brian T. Boutte

Brian T. Boutte, Notary Public No. 50555
My Comm. Expires for Life

EXHIBIT A

CITY OF LAFAYETTE : LAFAYETTE CITY COURT
VS. DOCKET NO(S): DT201800238
SC201800045 : PARISH OF LAFAYETTE
RAYNALDO MARKEITH SAMPY, JR. : STATE OF LOUISIANA

AFFIDAVIT

Request: Please provide copies of all documents showing (1) whether your firm provided security alarm system for "Sid's One Stop" located at 803 Martin Luther King, Jr. Drive, Lafayette, LA 70501; and (2) If so, also provide a copy of all notes, reports of incident, video recordings, and/or audio recordings made on May 5, 2018 between the hours of 04:00 a.m. and 06:00 a.m. relating to an incident or occurrence at Sid's One Stop, located at 803 Martin Luther King, Jr. Drive, Lafayette, LA 70501.

Before me, the undersigned authority, personally appeared Romney Venable who, being by me duly sworn, deposed as follows:

That she is the Custodian of Records for:
Burglar Alarms and Security Co., Inc. D/B/A Lafayette Alarm Services

That she is over eighteen (18) years of age, competent of making this affidavit and personally acquainted with the facts herein stated:

That on the dates and time indicated above, Lafayette Alarms, provided electronic burglary notification services for Sid's One Stop at the location described above.

That a thorough search of the files, carried out under her direction and control, revealed no records of a video surveillance system being installed or maintained by Lafayette Alarm Services at the location above described.

That Lafayette Alarm Services is not in possession of any records described in request item (2) as described above.

That it is to be understood that this does not mean that records do not exist under another spelling, another name or under another classification, but that with the information furnished to the office and to the best of her knowledge, no such records exist in the files.


ROMNEY VENABLE

Sworn to and subscribed before me on the 10th day of May, 2019


NOTARY PUBLIC

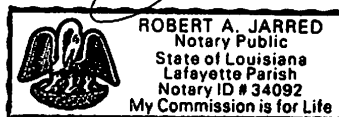


EXHIBIT B

n/a

n/a

Sampy, Raynaldo

DOCUMENT TYPE:
SERVICE DATE/TIME:
RESULT STATUS:
PERFORMED INFORMATION:
SIGNED INFORMATION:

ED Note-Physician
5/5/2018 09:39 CDT
Auth (Verified)
Sadeghi MD, Seyed A (5/5/2018 09:47 CDT)
Sadeghi MD, Seyed A (5/5/2018 09:47 CDT)

Facial laceration

Patient: **Sampy, Raynaldo** MRN: **000360613** FIN: **000360613-0008**
Age: **26 years** Sex: **Male** DOB: [REDACTED]
Associated Diagnoses: **Laceration of chin**
Author: **Sadeghi MD, Seyed A**

Basic Information

Time seen: Date 5/5/2018, Immediately upon arrival.

History source: Patient, police.

Arrival mode: Police.

History limitation: None.

Additional information: Chief Complaint from Nursing Triage Note : Chief Complaint
5/5/2018 7:04 CDT Chief Complaint Pt arrived in police custody with cuffs to
BUE, c/o midline chin laceration - LOC, needs tetanus .

History of Present Illness

The patient presents with facial laceration(s), Patient got in a fight while intoxicated early this morning. He fell and hit the bottom of his chin on the concrete. Policeman states he found him at 4:45am and he was in a yelling argument with a friend. . The onset was 4 hours ago. The course/duration of symptoms is constant. Type of injury: fall. The location where the incident occurred was in the street. Location: chin. The character of symptoms is bleeding and numbness, no pain, no swelling, not tingling, not loss of mobility and no suspected foreign body. The degree of bleeding is minimal. The degree of pain is none. The exacerbating factor is none. The relieving factor is none. Risk factors consist of alcohol abuse. Prior episodes: none. Therapy

Sampy, Raynaldo

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EXHIBIT C

Sampy, Raynaldo

n/a

n/a

ED Physician Note

today: none. Associated symptoms: denies rash, denies nausea, denies vomiting, denies altered vision, denies dyspnea, denies difficulty swallowing, denies epistaxis and denies impaired speech.

Patient unsure of last tetanus shot.

Review of Systems

Constitutional symptoms: No fever, no chills, no sweats, no weakness.

Skin symptoms: Laceration on chin, no rash, no pruritus.

ENMT symptoms: No sore throat,

Respiratory symptoms: No shortness of breath, no cough.

Cardiovascular symptoms: No chest pain, no palpitations, no tachycardia, no syncope, no diaphoresis, no peripheral edema.

Gastrointestinal symptoms: No abdominal pain, no nausea, no vomiting, no diarrhea, no constipation, no rectal bleeding.

Genitourinary symptoms: No dysuria, no hematuria.

Musculoskeletal symptoms: No back pain,

Neurologic symptoms: No headache, no dizziness.

Hematologic/Lymphatic symptoms: Bleeding tendency negative, bruising tendency negative.

Allergy/immunologic symptoms: No food allergies, no recurrent infections.

Health Status

Allergies:

Allergic Reactions (Selected)

No Known Allergies,

Allergies (1) Active

Reaction

No Known Allergies

None Documented

Medications: Per nurse's notes.

Immunizations: Patient unsure of when he received his last tetanus shot.

Past Medical/ Family/ Social History

Medical history:

No active or resolved past medical history items have been selected or recorded., Reviewed as documented in chart.

Surgical history:

Sampy, Raynaldo

n/a

n/a

ED Physician Note

Circumcision, surgical excision other than clamp, device, or dorsal slit; neonate (28 days of age or less) (CPT4 54160)., Reviewed as documented in chart.

Family history:

No family history items have been selected or recorded., Reviewed as documented in chart.

Social history:**Social & Psychosocial Habits****Alcohol**

04/14/2012

Risk Assessment: Denies Alcohol Use04/19/2016 **Use:** Never08/07/2017 **Use:** Current**Type:** Beer, Liquor**Frequency:** 1-2 times per week**Substance Abuse**

06/19/2013

Risk Assessment: Denies Substance Abuse08/07/2017 **Use:** Current**Type:** Marijuana**Frequency:** 1-2 times per week**Tobacco**

06/19/2013

Risk Assessment: High Risk04/19/2016 **Use:** Current every day smoker**Type:** Cigarettes**Tobacco use per day:** 2008/07/2017 **Use:** Former smoker05/05/2018 **Use:** Former smoker

, Reviewed as documented in chart, Alcohol use: Regularly, Tobacco use: Denies, Drug use: Marijuana.

Problem list:

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n/a

n/a

Sampy, Raynaldo

ED Physician Note**Active Problems (3)****Asthma****SCABIES****Tobacco user**

, per nurse's notes.

Physical Examination**Vital Signs****Vital Signs**

5/5/2018 7:04 CDT

Temperature Oral	36.9 DegC	
Temperature Oral (calculated)		98.42 DegF
Peripheral Pulse Rate	84 bpm	
Respiratory Rate	19 br/min	
SpO2	96 %	
Oxygen Therapy	Room air	
Systolic Blood Pressure	129 mmHg	
Diastolic Blood Pressure	83 mmHg	

Vital Signs (last 24 hrs)**Last Charted****Temp Oral**

36.9 DegC (MAY 05 07:04)

Heart Rate Peripheral

84 bpm (MAY 05 07:04)

Resp Rate

19 br/min (MAY 05 07:04)

SBP

129 mmHg (MAY 05 07:04)

DBP

83 mmHg (MAY 05 07:04)

SpO2

96 % (MAY 05 07:04)

Measurements

5/5/2018 7:04 CDT

Weight Dosing	68 kg	
Weight Measured and Calculated in Lbs		149.91 lb
Weight Estimated	68 kg	
Height/Length Dosing	178 cm	
Height/Length Estimated	178 cm	
Body Mass Index Estimated	21.46 kg/m2	

Basic Oxygen Information

5/5/2018 7:04 CDT

SpO2	96 %
Oxygen Therapy	Room air

General: Alert, no acute distress.**Skin:** Warm, dry, pink, no rash, normal for ethnicity, Small laceration 3cm on bottom of chin.

Sampy, Raynaldo

n/a

n/a

ED Physician Note**Head:** Normocephalic, atraumatic.**Cardiovascular:** Regular rate and rhythm, Normal peripheral perfusion, No edema.**Respiratory:** Lungs are clear to auscultation, respirations are non-labored.**Gastrointestinal:** Soft, Nontender, Non distended, Normal bowel sounds.**Back:** Nontender, Normal range of motion.**Musculoskeletal:** Normal ROM, normal strength, no tenderness.**Neurological:** Alert and oriented to person, place, time, and situation, No focal neurological deficit observed.**Psychiatric:** Cooperative.**Medical Decision Making****Documents reviewed:** Emergency department nurses' notes, emergency department records, prior records.**Results review:**

No qualifying data available.

Notes: Patient refused tetanus shot.**Reexamination/ Reevaluation**

Vital signs

Basic Oxygen Information

5/5/2018 7:04 CDT

SpO2

96 %

Oxygen Therapy

Room air

Course: improving, 3 sutures placed. Bleeding resolved. Patient tolerated the procedure well..

Pain status: unchanged.

Assessment: exam improved.

Procedure**Laceration repair****Time:** 5/5/2018 09:04:00 .**Confirmed:** Patient, procedure, side, and site correct.**Consent:** Patient, Has given verbal consent.**Description/ repair**

Laceration 3 cm in length. Shape: irregular.

Depth: superficial.

Details: clean.

Neurovascular/ tendon exam: intact.

Anesthesia: 1% lidocaine.

Sampy, Raynaldo

n/a

n/a

ED Physician Note

Preparation: skin prepped with betadine.

Irrigation: minimal.

Skin closure: # 3 sutures.

Complexity: single layer.

Post procedure exam: Circulation, motor, sensory examination intact.

Complications: None.

Patient tolerated: Well.

Performed by: Student.

Total time: 15 minutes.

Impression and Plan

Diagnosis

Laceration of chin (ICD10-CM S01.81XA)

Plan

Disposition: Medically cleared, Discharged: Time 5/5/2018 09:06:00, to home, Time 5/5/2018 09:06:00, Dispositioned by: Time: 5/5/2018 09:06:00, Sadeghi MD, Seyed A.

Prescriptions

Patient was given the following educational materials: Laceration Care, Adult, Laceration Care, Adult, Laceration Care, Adult.

Follow up with: ; Follow up in ED in 3-5 days for suture removal, Non Staff Physician MD; FU with Jail MD Remove the sutures in 7 days, FU with Jail MD Remove the sutures in 7 days; Non Staff Physician MD; Clear for incarceration, In: Cleared for incarceration.

Counseled: Patient, Regarding diagnosis, Regarding diagnostic results, Regarding treatment plan, Patient indicated understanding of instructions.

Orders: Launch Orders

Admit/Transfer/Discharge:

Discharge (Order): Home.

Notes: Discussed plan of care with Allie Messonnier PA, Cleared for incarceration, NO LOC.

Addendum

Teaching-Supervisory Addendum-Brief

I participated in the following activities of this patients care: the medical history, the physical exam.

I personally performed: supervision of the patient's care, the medical history, the physical exam.

The case was discussed with: the physician assistant.

Results interpretation: I agree with the documentation of the study interpretation.

n/a

n/a

Sampy, Raynaldo

Orders - Medications

Order: **diclofenac (diclofenac sodium 75 mg oral delayed release tablet)**

Order Start Date/Time: 5/6/2018 12:24 CDT

Order Date/Time: 5/6/2018 12:24 CDT

Order Status: Discontinued

Medication Type: Prescription

End-state Date/Time: 9/5/2018 20:35 CDT

End-state Reason:

Ordering Physician: Kgoadi PA, Collins T

Consulting Physician:

Entered By: Taylor PA, Taran C on 5/6/2018 12:24 CDT

Order Details: 75 = 1 mg tab(s), Oral, BID, # 20 tab(s), 0 Refill(s), Pharmacy: Walgreens Drug Store 05629

Order Comment:

Action Type: Discontinue

Action Date/Time: 9/5/2018 20:35 CDT

Action Personnel: Kgoadi PA, Collins T

Responsible Provider: Kgoadi PA, Collins T

Supervising Provider: Humble MD, Stephanie L

Communication Type: Written

Order Details: 75 mg = 1 tab(s), Oral, BID, # 20 tab(s), 0 Refill(s), Pharmacy: Walgreens Drug Store 05629

Review Information:

Doctor Cosign: Electronically Signed, Humble MD, Stephanie L on 9/6/2018 02:59 CDT

Order Comment:

Action Type: Prescribe

Action Date/Time: 5/6/2018 12:24 CDT

Action Personnel: Taylor PA, Taran C

Responsible Provider: Taylor PA, Taran C

Supervising Provider: Rodriguez-Quinones MD, Julio J

Communication Type: Written

Order Details: 75 mg = 1 tab(s), Oral, BID, # 20 tab(s), 0 Refill(s), Pharmacy: Walgreens Drug Store 05629

Review Information:

Doctor Cosign: Electronically Signed, Rodriguez-Quinones MD, Julio J on 5/6/2018 16:35 CDT

Order Comment:

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n/a

n/a

Sampy, Raynaldo

Orders - Medications

Order: ketorolac		
Order Start Date/Time: 5/6/2018 12:00 CDT		
Order Date/Time: 5/6/2018 11:25 CDT		
Order Status: Completed	Medication Type: Inpatient	
End-state Date/Time: 5/6/2018 11:33 CDT	End-state Reason:	
Ordering Physician: Taylor PA,Taran C	Consulting Physician:	
Entered By: Taylor PA,Taran C on 5/6/2018 11:25 CDT		
Order Details: 30 mg, form: Injection, IM, Once, first dose 5/6/18 12:00:00 PM CDT, stop date 5/6/18 11:33:22 AM CDT		
Order Comment:		
Action Type: Complete	Action Date/Time: 5/6/2018 11:33 CDT	Action Personnel: Broussard RN,Domini Beatrice
Responsible Provider: Taylor PA,Taran C	Supervising Provider:	Communication Type:
Order Details: 30 mg, form: Injection, IM, Once, first dose 05/06/18 12:00:00 CDT, stop date 05/06/18 12:00:00 CDT		
Review Information:		
Doctor Cosign: Not Required		
Order Comment:		
Action Type: Order	Action Date/Time: 5/6/2018 11:25 CDT	Action Personnel: Taylor PA,Taran C
Responsible Provider: Taylor PA,Taran C	Supervising Provider: Sadeghi MD,Seyed A	Communication Type: Written
Order Details: 30 mg, form: Injection, IM, Once, first dose 05/06/18 12:00:00 CDT, stop date 05/06/18 12:00:00 CDT		
Review Information:		
Nurse Review: Electronically Signed, Guillot RN,Lauren Elizabeth on 5/6/2018 11:30 CDT		
Pharmacist Verify: Not Reviewed		
Doctor Cosign: Electronically Signed, Sadeghi MD,Seyed A on 5/13/2018 17:34 CDT		
Pharmacist Verify: Electronically Signed, System, System on 5/6/2018 11:25 CDT		
Order Comment:		

Medication Administration Record**Medications**

Admin Date/Time: 5/6/2018 11:33 CDT
Medication Name: ketorolac
Charted Date/Time: 5/6/2018 11:33 CDT
Ingredients: ketorolac 30 mg
Admin Details: (Auth) IM, Right Deltoid
Action Details: Order: Taylor PA,Taran C 5/6/2018 11:25 CDT; Perform: Broussard RN,Domini Beatrice 5/6/2018 11:32 CDT; VERIFY: Broussard RN,Domini Beatrice 5/6/2018 11:32 CDT

Radiology - CT

ACCESSION	EXAM DATE/TIME	PROCEDURE	ORDERING PROVIDER	STATUS
CT-18-041267	5/6/2018 12:01 CDT	CT Maxillofacial W/O Contrast	Taylor PA,Taran C	Auth (Verified)

Reason For Exam

(CT Maxillofacial W/O Contrast) Head Injury

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n/a

n/a

Sampy, Raynaldo

Radiology - CT

Report

EXAM: CT Maxillofacial W/O Contrast

INDICATION: Head Injury, pain on the left side of face, stitches on the right face

TECHNIQUE: Axial computed tomographic imaging of the face is obtained without the administration of intravenous contrast. Automated exposure control is utilized to reduce patient radiation dose.

COMPARISON: None

FINDINGS: No radiographically significant facial soft tissue swelling or fracture is identified. There is a tiny mucous retention cyst or polyp in the right maxillary sinus. Trace mucosal thickening is noted in the ethmoid air cells and anterior sphenoid sinuses. The imaged mastoid air cells are well aerated. There is soft tissue in the right external auditory canal which likely represents cerumen. The nasal septum is midline. The nasal bones, zygomatic arches and pterygoid plates are intact. The globes are normal in contour and position. The extraocular muscles and lacrimal glands are symmetric. The orbital fat and orbital floors are intact. The temporomandibular joints are unremarkable. The imaged upper cervical spine is within normal limits. Prominent dental caries are noted at tooth #16.

IMPRESSION:

No acute abnormality identified. Prominent dental caries at tooth #16.

Electronically Signed By: Sneider DO, Angela Nicole

Date/Time Signed: 05/06/2018 12:10

Technical Comments

Home Medication Reviewed? No