

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

**B.C., a minor, by and through his natural)
parent and next friend ARMA COOPER;)
D.L., a minor, by and through his natural)
parent and next friend CHINATA)
JOHNSON; A.G., a minor, by and through)
his natural parent and next friend)
TIFFANY GREER; C.W., a minor, by and)
through his natural parent and next friend)
BARBARA WEATHERBY; L.E., a minor,)
by and through his natural parent and next)
friend CHRISTOPHER ESTES; D.F., a)
minor, by and through his natural parent)
and next friend ANGENETTE HAYMER;)
K.H., a minor, by and through his natural)
parent and next friend KENNY)
ELLINGTON,)**

Plaintiffs,

v.

**ATTALA COUNTY SCHOOL)
DISTRICT; LEROY WISE, individually)
and in his official capacity as a Campus)
Security Officer/School Resource Officer;)
DIETRICH HARMON, individually and in)
his official capacity as Principal of)
McAdams High School; RHYNE)
THOMPSON, in his/her official capacity as)
Superintendent of the Attala County)
School District; and JOHN DOES 1-10)**

Defendants.

Civil Action No. 4:26-cv-85-RPC-JMV

PLAINTIFFS' COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiffs, by and through undersigned counsel, file this Complaint against Defendants and state as follows:

I. INTRODUCTION

1. This civil-rights action arises from the unconstitutional strip searches of minor students at McAdams High School in Attala County, Mississippi.

2. On or about February 10, 2026, at around 9:00 a.m., a group of minor boys was removed from a restroom area, detained, taken one-by-one into a separate room, ordered to remove their clothing, required to lower their undergarments, and made to squat and/or bend over while naked or effectively naked so that an adult authority figure could inspect them.

3. The searches exposed the children's genital areas and intimate body parts.

4. The children were not given any adequate explanation for the search, were not told of any individualized accusation against them, and were not advised that they could not refuse.

5. No contraband was found on any Plaintiff.

6. The conduct was unnecessary, degrading, humiliating, sexually invasive, and grossly disproportionate to any legitimate school-safety need.

7. The searches were carried out by school and campus-security personnel acting under color of state law and under the authority of the Attala County School District.

8. The District cannot refuse that the conduct violated District policy, including Attala County School District Policy JCDA.

9. Plaintiffs bring this action to vindicate their constitutional rights, recover damages for severe emotional and psychological harm, and obtain such other relief as the law allows.

II. JURISDICTION AND VENUE

10. This Court has subject-matter jurisdiction over Plaintiffs' federal claims under 28 U.S.C. §§ 1331 and 1343 because this action arises under the Constitution and laws of the United States, including 42 U.S.C. § 1983.

11. This Court has supplemental jurisdiction over Plaintiffs' state-law claims under 28 U.S.C. § 1367 because those claims arise from the same case or controversy as Plaintiffs' federal claims.

12. Venue is proper in this District under 28 U.S.C. § 1391(b) because the events giving rise to these claims occurred in Attala County, Mississippi, and because one or more Defendants reside in or perform official duties within this District.

13. Plaintiffs complied with the Mississippi Tort Claims Act notice provisions, Miss. Code Ann. § 11-46-11, before filing state-law tort claims. The statutory waiting period expired on or about June 15, 2026.

III. PARTIES

14. Plaintiff B.C. is a minor child who, at all relevant times, was a student at McAdams High School in Attala County, Mississippi. He brings this action by and through his natural parent and next friend, Arma Cooper.

15. Plaintiff D.L. is a minor child who, at all relevant times, was a student at McAdams High School in Attala County, Mississippi. He brings this action by and through his natural parent and next friend, Chitana Johnson.

16. Plaintiff A.G. is a minor child who, at all relevant times, was a student at McAdams High School in Attala County, Mississippi. He brings this action by and through his natural parent and next friend, Tiffany Greer.

17. Plaintiff C.W. is a minor child who, at all relevant times, was a student at McAdams High School in Attala County, Mississippi. He brings this action by and through his natural parent and next friend, Barbara Weatherby.

18. Plaintiff L.E. is a minor child who, at all relevant times, was a student at McAdams High School in Attala County, Mississippi. He brings this action by and through his natural parent and next friend, Christopher Estes.

19. Plaintiff D.F. is a minor child who, at all relevant times, was a student at McAdams High School in Attala County, Mississippi. He brings this action by and through his natural parent and next friend, Angenette Haymer.

20. Plaintiff K.H. is a minor child who, at all relevant times, was a student at McAdams High School in Attala County, Mississippi. He brings this action by and through his natural parent and next friend, Penny Ellington.

21. Defendant Attala County School District is a public school district and political subdivision of the State of Mississippi. It operates McAdams High School and, at all relevant times, acted under color of state law.

22. Defendant Leroy Wise was, at all relevant times, acting as a Campus Security Officer, School Resource Officer, campus enforcement officer, or equivalent law-enforcement/security officer at McAdams High School. He is sued individually for his personal participation in the unconstitutional searches and in his official capacity to the extent appropriate.

23. Defendant Principal Dietrich Harmon was, at all relevant times, the Principal or acting administrator of McAdams High School. Upon information and belief, Harmon knew of, authorized, approved, directed, permitted, participated in, and/or failed to stop the strip searches described herein. During the searches, Harmon was physically present in the hallway and

monitored the detained students to ensure that no student left the scene before being searched.

Harmon is sued individually and in his official capacity.

24. Defendant Rhyne Thompson was, at all relevant times, the Superintendent of the Attala County School District and is sued in his/her official capacity for prospective, declaratory, and policy-related relief to the extent necessary.

25. Defendants John Does 1-10 are presently unidentified employees, agents, administrators, officers, deputies, campus police/security personnel, teachers, coaches, or staff members who participated in, directed, approved, facilitated, witnessed, or failed to prevent the unconstitutional searches. Plaintiffs will amend this Complaint upon learning their identities.

26. At all relevant times, Defendants acted under color of Mississippi law and within the course and scope of their employment, agency, or official duties, except to the extent their acts were intentional, malicious, reckless, grossly negligent, or otherwise outside the scope of lawful authority.

IV. FACTUAL ALLEGATIONS

A. McAdams High School and the District's Campus Security Structure

28. McAdams High School is operated by Defendant Attala County School District.

29. Upon information and belief, the District created, maintained, or operated a campus security, campus enforcement, school resource officer, or school district police structure at McAdams High School.

30. The District has represented that the law-enforcement authority involved in this incident was exercised by a campus enforcement officer employed by the District and acting under District authority.

31. The District has further represented that the Attala County School District Police Department was created by school board resolution and that campus enforcement officer authority derives from state law.

32. At all relevant times, Defendant Wise possessed actual or apparent authority over students at McAdams High School.

33. Students, including Plaintiffs, reasonably understood that they were required to comply with Defendant Wise, school administrators, and school personnel.

34. The District was responsible for training, supervising, directing, disciplining, and controlling Defendant Wise and other personnel involved in student searches.

35. The District was responsible for ensuring that student searches complied with the United States Constitution, Mississippi law, District policy, and basic standards of child safety and dignity.

B. The Detention of Plaintiffs

36. On or about February 10, 2026, at approximately 9:13 a.m., Plaintiffs were in or near a restroom area at McAdams High School.

37. Defendant Wise and Coach Kenyon Ross, along with other school personnel whose identities are presently unknown, removed Plaintiffs from the restroom area.

38. Plaintiffs were directed into the hallway and instructed to stand or line up against a wall.

39. Plaintiffs were not given a meaningful explanation for why they were being detained.

40. Plaintiffs were not told that any specific student had accused them of hiding contraband on their bodies.

41. Plaintiffs were not told that school officials had individualized suspicion that any Plaintiff possessed contraband in his underwear, near his genitals, or in any intimate body area.

42. Plaintiffs were minors and were under the authority and control of school and campus-security personnel.

43. Plaintiffs reasonably believed they were not free to leave and that refusal to comply would result in punishment, including school discipline.

44. The detention was coercive and intimidating.

C. The Strip Searches

45. Plaintiffs were taken individually into a separate room.

46. Once inside, each Plaintiff was subjected to an invasive strip search.

47. Plaintiffs were ordered to remove clothing items, including shirts, undershirts, pants, shoes, and other garments.

48. Plaintiffs were ordered to lower their undergarments.

49. Plaintiffs were required to expose their genital areas and intimate body parts.

50. Plaintiffs were further required to squat, bend over, or otherwise position their bodies for inspection while naked or effectively naked.

51. The search required the children to expose the most private parts of their bodies to adult authority figures in a school setting.

52. Plaintiffs did not consent to the searches.

53. Any purported compliance was the product of coercion, fear, and the authority exercised by school and campus-security personnel. Specifically, Plaintiffs were threatened with suspension if they did not submit to the unwarranted and malicious search.

54. Plaintiffs were not permitted to contact their parents or guardians before the searches.

55. Plaintiffs' parents and guardians were not asked for consent before the searches.

56. Plaintiffs were not afforded privacy, dignity, or any reasonable safeguard appropriate to a search of minors.

57. The searches were grossly intrusive in light of Plaintiffs' ages, sex, vulnerability, and status as schoolchildren.

58. The searches were not justified by any individualized suspicion that Plaintiffs possessed contraband in their underwear, next to their genitals, or in any intimate body area.

59. The searches were not justified by any emergency, imminent threat, or exigent circumstance.

60. No contraband was found on any child who was searched, and each child denied possessing any contraband.

61. After the searches, Plaintiffs were allowed or required to return to school activities, including class, despite the humiliating and traumatic nature of what had occurred.

D. Administrator Knowledge, Authorization, and Failure to Intervene

62. Principal Dietrich Harmon knew that Plaintiffs were being detained and searched.

63. Harmon was not merely aware of the searches. He participated in the search operation by standing in the hallway and monitoring the detained students to ensure that no student left the scene before being searched.

64. Harmon's presence and conduct demonstrate that the searches were not spontaneous acts by a rogue individual occurring outside the awareness of school administration.

65. Instead, the searches occurred within the school environment, during school hours, and with the involvement, approval, or acquiescence of school personnel.

66. Harmon had a reasonable opportunity to intervene, stop the searches, release the detained students, notify parents or guardians, require compliance with District policy, and prevent the violation of Plaintiffs' rights.

67. No reasonable school administrator, campus security officer, or school employee could believe that it was lawful to require minor students to strip, expose their genitals, and squat or bend over absent individualized suspicion and extraordinary justification.

E. Policy Violation and District Response

68. After the incident, the District acknowledged that the conduct violated District policy, including Attala County School District Policy JCDA.

69. The District's acknowledgement confirms that the searches were not conducted in accordance with the District's own rules governing student discipline, searches, or treatment.

70. The policy violation was not a harmless technical violation.

71. The policy violation involved the coerced exposure of children's intimate body parts and a profound invasion of bodily privacy.

72. The District has also represented that it responded to the policy violation.

73. The nature, timing, adequacy, and completeness of the District's response remain matters for discovery.

74. Upon information and belief, the District failed before the incident to adequately train, supervise, and instruct campus-security personnel, administrators, coaches, and employees regarding the constitutional limits on searches of students.

75. Upon information and belief, the District failed to maintain adequate safeguards to prevent strip searches of minors absent lawful justification, parental involvement where appropriate, administrative review, and strict compliance with constitutional requirements.

76. Upon information and belief, the District's training and supervision were inadequate in light of the obvious risk that school and campus-security personnel might conduct unconstitutional searches of students.

77. The need for proper training and supervision regarding student searches was obvious because school officials and campus-security personnel regularly exercise authority over children in circumstances involving discipline, suspected contraband, privacy, and bodily integrity.

F. Harm to Plaintiffs

78. Plaintiffs suffered severe humiliation, shame, fear, embarrassment, emotional distress, mental anguish, and loss of dignity.

79. Plaintiffs experienced the searches as frightening, coercive, degrading, and sexually invasive.

80. Plaintiffs have suffered and continue to suffer psychological and emotional consequences from the searches.

81. Some Plaintiffs have experienced anger, behavioral changes, anxiety, school-related distress, loss of trust in school authorities, sleep disruption, social withdrawal, humiliation, and other trauma responses.

82. At least one Plaintiff has exhibited violent or aggressive behavioral changes following the incident.

83. Plaintiffs require counseling, psychological evaluation, therapy, medical care, educational accommodations, and other support.

84. Plaintiffs' parents and guardians have suffered distress, concern, loss of trust, and disruption arising from the harm inflicted on their children.

85. Plaintiffs' damages are continuing and will be proven at trial.

V. CLAIMS FOR RELIEF

COUNT I: 42 U.S.C. § 1983 – Fourth Amendment Unreasonable Search and Seizure Against Defendant Wise, Defendant Harmon, and John Doe Individual Defendants

86. Plaintiffs incorporate all preceding paragraphs as if fully set forth herein.

87. Plaintiffs had a clearly established Fourth Amendment right to be free from unreasonable searches and seizures at school.

88. Plaintiffs were seized when they were removed from the restroom area, directed into the hallway, required to line up, taken into a separate room, and not permitted to leave.

89. Plaintiffs were searched when they were required to remove clothing, lower undergarments, expose their genital areas, and squat or bend over for inspection.

90. The searches were unreasonable at inception because Defendants lacked individualized reasonable suspicion that each Plaintiff possessed contraband.

91. The searches were unreasonable in scope because requiring minor children to expose their genital areas and squat or bend over was excessively intrusive in light of Plaintiffs' ages, sex, the nature of the alleged infraction, the lack of individualized suspicion, and the absence of any emergency.

92. The searches were also unreasonable because no Defendant had reasonable grounds to believe that contraband was hidden in Plaintiffs' underwear, next to their genitals, or in any intimate area of their bodies.

93. Defendant Wise personally participated in the searches and caused the deprivation of Plaintiffs' constitutional rights.

94. Defendant Dietrich Harmon knew of, approved, directed, permitted, or failed to intervene to stop the unconstitutional searches.

95. John Doe Defendants personally participated in, facilitated, approved, or failed to stop the unconstitutional searches.

96. Defendants acted intentionally, knowingly, recklessly, and with deliberate indifference to Plaintiffs' constitutional rights.

97. Defendants' conduct was objectively unreasonable and violated clearly established law.

98. As a direct and proximate result, Plaintiffs suffered compensatory damages and are entitled to all remedies available under 42 U.S.C. § 1983.

COUNT II: 42 U.S.C. § 1983 – Fourteenth Amendment Bodily Integrity and Substantive Due Process Against Defendant Wise, Defendant Harmon, and John Doe Individual Defendants, Pleaded in the Alternative

99. Plaintiffs incorporate all preceding paragraphs as if fully set forth herein.

100. Plaintiffs had a constitutional right to bodily integrity, personal security, and freedom from arbitrary, conscience-shocking governmental invasion of their intimate bodies.

101. Defendants' conduct violated Plaintiffs' bodily integrity by coercing minor children to expose their genitals and intimate body parts to adult authority figures.

102. Defendants' conduct was abusive, degrading, sexually invasive, and conscience-shocking.

103. Defendants acted under color of state law and used their authority over schoolchildren to compel compliance.

104. Defendants' conduct was intentional, reckless, deliberately indifferent, and objectively unreasonable.

105. To the extent any portion of Plaintiffs' claim is not fully encompassed by the Fourth Amendment, Plaintiffs plead this claim in the alternative under the Fourteenth Amendment.

106. As a direct and proximate result, Plaintiffs suffered compensatory damages and are entitled to all remedies available under 42 U.S.C. § 1983.

COUNT III: 42 U.S.C. § 1983 – Municipal Liability/Monell Against Attala County School District

107. Plaintiffs incorporate all preceding paragraphs as if fully set forth herein.

108. Defendant Attala County School District is a local governmental entity subject to liability under 42 U.S.C. § 1983 for constitutional injuries caused by its policies, customs, practices, decisions of final policymakers, failures to train, failures to supervise, or ratification of unconstitutional conduct.

109. The unconstitutional searches were caused by one or more District policies, customs, practices, omissions, or decisions, including but not limited to:

a. failure to train campus-security personnel, administrators, coaches, and staff regarding constitutional limits on student searches;

b. failure to train personnel that strip searches of minors require individualized suspicion and extraordinary justification;

c. failure to supervise campus-security personnel and administrators responsible for student discipline and searches;

d. failure to maintain adequate procedures requiring administrative review, parental notification where appropriate, documentation, and strict safeguards before any search involving removal of clothing or exposure of intimate body parts;

e. permitting campus-security personnel and school staff to conduct searches without adequate constitutional guidance;

f. permitting or tolerating a culture in which students could be coerced into invasive searches without meaningful review;

g. decisions by final policymakers or officials with delegated authority who authorized, approved, or ratified the searches; and

h. post-incident ratification or inadequate corrective action, to the extent shown by discovery.

110. The risk that inadequately trained and supervised school and campus-security personnel would violate students' constitutional rights through intrusive searches was obvious.

111. The need for training and supervision regarding searches of students was especially obvious because the District operated a campus-security or school-district law-enforcement structure with authority over children.

112. The District's failure to provide adequate training, supervision, policies, and safeguards amounted to deliberate indifference to Plaintiffs' constitutional rights.

113. The District's failures were the moving force behind the unconstitutional searches.

114. Alternatively, the unconstitutional searches were authorized, approved, or ratified by an official or officials with final policymaking authority for the District concerning student discipline, campus safety, or school search practices.

115. As a direct and proximate result of the District's policies, customs, practices, omissions, failures, decisions, and ratification, Plaintiffs suffered constitutional injuries and damages.

COUNT IV: Mississippi Tort Claims Act – Negligence, Gross Negligence, and Reckless Disregard Against Attala County School District

116. Plaintiffs incorporate all preceding paragraphs as if fully set forth herein.

117. Plaintiffs provided notice under the Mississippi Tort Claims Act, Miss. Code Ann. § 11-46-11.

118. At all relevant times, District employees and agents owed Plaintiffs duties to exercise reasonable care, supervise students safely, comply with District policy, comply with constitutional standards, and protect Plaintiffs from foreseeable harm.

119. The District, through its employees and agents, breached those duties by:

- a. detaining Plaintiffs without adequate justification;
- b. subjecting Plaintiffs to unreasonable and invasive strip searches;
- c. failing to prevent the coerced exposure of Plaintiffs' genital areas;
- d. failing to follow District policy;
- e. failing to properly train and supervise personnel regarding student searches;
- f. failing to intervene to stop unlawful conduct; and
- g. failing to protect Plaintiffs from foreseeable emotional and psychological harm.

120. The conduct of District employees and agents was negligent, grossly negligent, reckless, and in reckless disregard of Plaintiffs' rights, safety, privacy, and dignity.

121. The conduct was a direct and proximate cause of Plaintiffs' injuries.

122. Plaintiffs seek damages permitted by the Mississippi Tort Claims Act and any applicable insurance, risk-pool, excess coverage, or other lawful source of recovery.

COUNT V: Mississippi Tort Claims Act – Assault and Battery/Offensive Physical Invasion Against Attala County School District

123. Plaintiffs incorporate all preceding paragraphs as if fully set forth herein.

124. Plaintiffs were placed in reasonable apprehension of imminent harmful or offensive contact and bodily invasion.

125. Plaintiffs were compelled by authority figures to remove clothing, expose intimate body parts, and submit to inspection.

126. The conduct constituted assault, battery, offensive touching or invasion, or the functional equivalent thereof under Mississippi law, to the extent permitted by the Mississippi Tort Claims Act.

127. Plaintiffs did not consent.

128. Any purported compliance was coerced and involuntary.

129. Plaintiffs suffered damages as a direct and proximate result.

COUNT VI: Mississippi Tort Claims Act – Invasion of Privacy Against Attala County School District

130. Plaintiffs incorporate all preceding paragraphs as if fully set forth herein.

131. Plaintiffs had a reasonable expectation of bodily privacy and dignity, especially regarding their unclothed bodies, genital areas, and intimate body parts.

132. Defendants intentionally or negligently intruded upon Plaintiffs' seclusion, solitude, bodily privacy, and private affairs in a manner highly offensive to a reasonable person.

133. The intrusion was extreme because Plaintiffs were minor children compelled by school and campus-security personnel to expose their intimate body parts.

134. Plaintiffs suffered damages as a direct and proximate result.

COUNT VII: Mississippi Tort Claims Act – Intentional or Negligent Infliction of Emotional Distress Against Attala County School District

135. Plaintiffs incorporate all preceding paragraphs as if fully set forth herein.

136. Defendants' conduct was extreme, outrageous, negligent, grossly negligent, reckless, and/or intentionally harmful.

137. Requiring minor children to strip, expose their genitals, and squat or bend over for inspection at school is conduct that exceeds all bounds of decency tolerated in a civilized society.

138. Defendants knew or should have known that such conduct would cause severe emotional distress to minor children.

139. Plaintiffs suffered severe emotional distress, humiliation, shame, fear, trauma, anger, behavioral disruption, and other psychological harm.

140. Plaintiffs are entitled to damages permitted by law.

COUNT VIII: Declaratory and Injunctive Relief Against Attala County School District and Appropriate Official-Capacity Defendants

141. Plaintiffs incorporate all preceding paragraphs as if fully set forth herein.

142. Plaintiffs seek declaratory relief that the searches violated their rights under the Fourth and Fourteenth Amendments.

143. Plaintiffs further seek injunctive relief requiring the District to implement constitutionally adequate policies, training, supervision, documentation requirements, and safeguards governing searches of students, including any search involving removal of clothing, exposure of intimate body parts, or involvement of campus-security personnel.

144. Plaintiffs seek injunctive relief to prevent future unlawful strip searches of students at McAdams High School and throughout the Attala County School District.

145. Plaintiffs seek such declaratory and injunctive relief as the Court deems just and proper.

VI. DAMAGES

146. As a direct and proximate result of Defendants' conduct, Plaintiffs suffered injuries and damages, including but not limited to:

- a. severe emotional distress;
- b. humiliation;
- c. shame and embarrassment;
- d. invasion of bodily privacy;
- e. psychological trauma;
- f. anxiety, anger, fear, and behavioral changes;
- g. loss of trust in school officials and authority figures;
- h. school-related distress;
- i. need for counseling, therapy, evaluation, or treatment;
- j. loss of enjoyment of life;
- k. nominal damages for constitutional violations;
- l. compensatory damages;
- m. punitive damages against individual Defendants in their individual capacities under federal law; and
- n. all other damages permitted by law.

147. Plaintiffs do not seek punitive damages against the District or other governmental entities where barred by law.

148. Plaintiffs reserve the right to amend their damages allegations as discovery and evaluation continue.

VII. CONDITIONS PRECEDENT

149. All conditions precedent to filing this action have occurred, have been performed, or have been waived.

150. Plaintiffs served notice under Miss. Code Ann. § 11-46-11 for their state-law claims and waited the required statutory period before filing those claims.

151. No notice is required as a condition precedent to Plaintiffs' federal constitutional claims under 42 U.S.C. § 1983.

VIII. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor and against Defendants and award the following relief:

- A. compensatory damages in an amount to be determined by the jury;
- B. nominal damages for violations of Plaintiffs' constitutional rights;
- C. punitive damages against individual Defendants in their individual capacities under federal law;
- D. declaratory relief;
- E. injunctive relief requiring constitutionally adequate policies, training, supervision, and safeguards regarding student searches;
- F. attorneys' fees and costs under 42 U.S.C. § 1988 and any other applicable law;
- G. pre-judgment and post-judgment interest as allowed by law;

H. all damages permitted under the Mississippi Tort Claims Act and any applicable insurance, risk-pool, excess coverage, or other lawful source of recovery; and

I. such other and further relief as the Court deems just and proper.

IX. JURY DEMAND

Plaintiffs demand a trial by jury on all issues so triable.

Date: June 15, 2026

Respectfully Submitted,

By: /s/ Keith B. French

Keith B. French
MS Bar No. 104628
kfrench@peoplefirstfirm.com

Kevron McMillan
MS Bar No. 107062
kcmillan@peoplefirstfirm.com

KEITH B. FRENCH LAW, PLLC
401 E. Capitol St., Suite 515
Jackson, MS 39201
(832) 243-6153
(832) 243-1927 – Facsimile

ATTORNEYS FOR PLAINTIFF