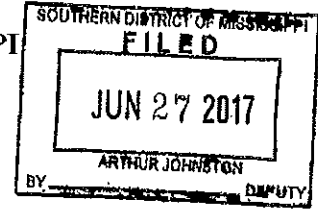


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



ROBIN MAYFIELD,)
OWEN MAYFIELD,)
WILLIAM MAYFIELD, and)
The ESTATE OF MARK STEVENS)
MAYFIELD)

Plaintiffs,)

v.)

BUTLER SNOW LLP,)
DONALD CLARK, JR.,)
THE CITY OF MADISON,)
MISSISSIPPI,)
MARY HAWKINS-BUTLER,)
INDIVIDUALLY AND IN HER)
OFFICIAL CAPACITY,)
POLICE CHIEF GENE WALDROP,)
INDIVIDUALLY AND IN HIS)
OFFICIAL CAPACITY,)
CHUCK HARRISON, INDIVIDUALLY)
AND IN HIS OFFICIAL CAPACITY,)
VICKIE CURRIE, INDIVIDUALLY)
AND IN HER OFFICIAL CAPACITY,)
RICHARD WILBOURN, III, and)
JOHN AND JANE DOES 1-10,)

Defendants.)

CAUSE NO.: 3:17cv514CWR-FKB

COMPLAINT

JURY TRIAL DEMANDED

COME NOW Robin Mayfield, Owen Mayfield, William Mayfield, and the Estate of Mark Stevens Mayfield (the "Mayfield Estate"), and file this, their Complaint against Butler Snow LLP; Donald Clark, Jr.; the City of Madison, Mississippi; Mary Hawkins-Butler, individually and in her official capacity as Mayor of the City of Madison; Gene Waldrop, individually and in his official capacity as City of Madison Police Chief; Chuck Harrison,

individually and in his official capacity; Vickie Currie, individually and in her official capacity; Richard Wilbourn, III; and John and Jane Does 1-10.

1. This is an action under 42 U.S.C. § 1983 and § 1988 for deprivation of civil rights, false arrest, false imprisonment, kidnapping, failing to intervene, violation of the equal protection and substantive due process clauses of Fourteenth Amendment to the U.S. Constitution, and for violation of free speech and associational rights guaranteed by the First Amendment to the U.S. Constitution; violation of rights under color of federal law ("*Bivens* action") arising under the First, Fourth and Fifth Amendments to the U.S. Constitution; abuse of process; negligent infliction of emotional distress; wrongful death; and civil conspiracy.

2. The Defendants engaged in unconstitutional, negligent and/or tortious actions that harmed Mark Mayfield, Robin Mayfield, Owen Mayfield, William Mayfield; and deprived Plaintiffs of their constitutional rights; effectively shut down Mark Mayfield's law practice; embarrassed and humiliated the Plaintiffs; and caused severe emotional distress to Mark Mayfield and his family, all of which directly led to Mark Mayfield's untimely death.

JURISDICTION AND VENUE

3. This Court has original jurisdiction over Plaintiffs' claims pursuant to 28 U.S.C. §§ 1331 and 1343. The Court has jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367.

4. This Court is the proper venue for the instant dispute pursuant to 28 U.S.C. § 1391(b), as the actions alleged herein occurred in the Southern District of Mississippi.

PARTIES

5. Plaintiff Robin Mayfield is an adult resident of Madison County, Mississippi.

6. Plaintiff Owen Mayfield is an adult resident of Hinds County, Mississippi.

7. Plaintiff William Mayfield is an adult resident of Hinds County, Mississippi.

8. At the time of his death, Mark Stevens Mayfield was a citizen of the United States of America and the State of Mississippi wherein he resided in Madison County, Mississippi. On behalf of Plaintiff Estate of Mark Stevens Mayfield, Deceased (the "Mayfield Estate"), the suit is brought by Owen Mayfield and William Mayfield, the sons of Mark Mayfield and the duly appointed Co-Executors of the Mayfield Estate.

9. Defendant Butler Snow LLP is a Delaware limited liability partnership headquartered in Ridgeland, Madison County, Mississippi. Butler Snow LLP may be served through its Registered Agent, Thomas E. Williams, Butler Snow LLP, 1020 Highland Colony Parkway, Suite 1400, Ridgeland, Mississippi 39157-2139.

10. Defendant Donald Clark, Jr. is an adult resident of Hinds County, Mississippi. Mr. Clark may be served with process at 2046 Brecon Drive, Jackson, Mississippi 39211.

11. Defendant City of Madison (hereafter "City") is a municipal corporation organized and existing under the laws of the State of Mississippi having authority, duties and powers as provided under the laws of the State of Mississippi, and existing and operating within the judicial district of the Southern District of Mississippi.

12. Defendant Mary Grace Hawkins-Butler is an individual resident of Madison County, Mississippi who may be served at City Hall, 1004 Madison Avenue, Madison, MS 39110, or at her residence at 238 N. Castle Drive, Madison, MS 39110. Defendant Mary Grace Hawkins-Butler is being sued in her individual capacity and in her official capacity as Mayor of the City of Madison, Mississippi.

13. Defendant Gene Waldrop is an individual resident of Madison County, Mississippi who may be served at 2001 Main Street, Madison, MS 39110. Defendant Gene Waldrop is being sued

in his individual capacity and in his official capacity as Police Chief of the City of Madison, Mississippi.

14. Defendant Chuck Harrison is an adult Mississippi resident who may be served at 2001 Main Street, Madison, MS 39110. Defendant Chuck Harrison is being sued in his individual capacity and in his official capacity as a law enforcement officer for the City of Madison, Mississippi.

15. Defendant Vickie Currie is an adult Mississippi resident who may be served at 2001 Main Street, Madison, MS 39110. Defendant Vickie Currie is being sued in her individual capacity and in her official capacity as a law enforcement officer for the City of Madison, Mississippi.

16. Defendant Richard Wilbourn, III is an adult resident of Madison County, Mississippi. Mr. Wilbourn may be served with process at 206 Jefferson Ridge, Ridgeland, Mississippi 39157.

17. Defendants John and Jane Does 1-10 are unknown individuals and/or entities liable to Plaintiffs for the acts and omissions as alleged herein. The names and capacities of Defendants John and Jane Does 1-10 inclusive, whether individual, corporate or otherwise, are presently unknown to Plaintiffs, who therefore sue said Defendants by fictitious names and will further seek leave of Court to amend this Complaint to show their true names and capacities when the same are ascertained. Plaintiffs allege upon information and belief each of the Defendants designated herein as a Doe is responsible in some manner and liable herein to Plaintiffs in some manner whether alleged herein in this Complaint or not, and by such wrongful conduct, said Defendants, each of them, proximately caused the injury and damage occasioned herein.

BACKGROUND OF THE PARTIES

MARK MAYFIELD AND HIS FAMILY

18. Mark Stevens Mayfield (“Mark”) passed away on June 27, 2014, three years ago today. Mark was 57 years old at the time of his death.
19. Mark Mayfield was a loving father and husband, and a gentle human being.
20. Mark was born in 1956 in Laurel, Mississippi; he was the first of his parents’ three children.
21. Mark spent his very early years growing up in Bay Springs, Mississippi, and in 1962 his family moved to Jackson, Mississippi.
22. Mark graduated from Jackson Preparatory School and later attended the University of Mississippi and the University of Mississippi School of Law where he earned his Juris Doctorate degree.
23. Mark Mayfield was a well-respected, Mississippi-licensed attorney.
24. Upon receiving his law degree in 1981, Mark returned to Jackson and practiced real estate law for 33 years, including 19 years with his father until his father’s death in 2002. He was a member of the Mississippi and American Bar Associations.
25. Mark met the love of his life, Robin Reeves (“Robin” or “Robin Mayfield”), at the Mississippi Bar Convention, and they were married on August 21, 1982.
26. Mark was an active and respected member of First Baptist Church Jackson.
27. Mark Mayfield was an influential figure in Jackson business and many social and political organizations.

28. Mark Mayfield put the interests of others first and had a pure, authentic interest in others he met. Mark loved connecting people and bringing them together. Always thinking of others, Mark exhibited a genuine servant's spirit in all of his relationships.

29. Mark loved life, people, and his family. He was a mentor, an outdoor enthusiast, very involved in his sons' upbringing, and an important role model for many in his life.

30. Mark had a great love for the State of Mississippi and the United States of America.

31. Robin Mayfield is the widow of Mark Mayfield. Mark and Robin were married on August 21, 1982, and remained husband and wife for 31 years, until Mark's tragic death.

32. Mark and Robin were blessed with two sons, Owen Mayfield ("Owen") and William Mayfield ("William").

33. Owen is the oldest son of Mark and Robin. William is Mark and Robin's youngest son. Both Owen and William graduated from St. Andrew's Episcopal School and the University of Mississippi. Mark was an engaged member of the St. Andrew's Episcopal School community.

34. Mark Mayfield greatly loved his family, Plaintiffs herein, and his family greatly loved him.

35. Mark's text messages and emails reveal a kind and loving father and husband who communicated most often with his two sons Owen and William, and his wife Robin. They constantly encouraged each other, checked in with each other, and shared supportive messages such as Bible verses and personally-written motivational messages. His family was close and showed genuine caring towards each other.

36. Mark Mayfield was involved in his church and various charities and civic activities but, until these events, was not previously materially involved in political activity.

37. Mark Mayfield became politically involved in founding the Mississippi Tea Party.

38. Ultimately, Mark became politically involved in the campaign of State Senator Chris McDaniel, Republican candidate for United States Senate.

39. In addition to communication with family and friends, Mark communicated via text, email, and voice with others who worked on the campaign for State Senator Chris McDaniel.

40. Mark showed an eagerness and willingness to help through encouraging others to attend events, analyzing items from a legal perspective, or offering his political insight as to strategy.

41. Even when communications may have shown some negative tendencies towards Chris McDaniel's opponent, Senator Thad Cochran, or towards others who they considered to be the "Republican Establishment", Mark did not communicate blatant insults as did others.

42. Nevertheless, his support of State Senator McDaniel put him at odds with many local and statewide elected officials in Mississippi who were supportive of incumbent United States Senator Thad Cochran.

43. Many of Cochran's corporate supporters were powerful, and benefited directly, financially, from Cochran's position of power. They had a lot to lose if McDaniel defeated Cochran.

44. On or about May 22, 2014, Currie signed an arrest warrant for Mark Mayfield.

45. On that same date, Harrison signed a search warrant for Mark's office.

46. Based upon the actions of the Madison Police Department through Waldrop, Harrison, and Currie, Mark Mayfield was arrested at his law office shortly after the warrants were issued.

47. Mark was charged by the City of Madison with conspiracy to exploit a vulnerable adult, a felony.¹

¹ Clayton Kelly had previously been arrested by the Madison Police Department for exploitation of a vulnerable adult in connection with his taking of video and/or photographs of Senator Thad Cochran's bedridden wife in the St. Catherine's Village nursing home. John Mary and Richard Sager were also arrested and charged with conspiracy.

48. Mark was well-established and well-respected, had no prior criminal history, and posed no threat of flight. Nevertheless, Mark was given excessive bail by the City of Madison.

49. Mark became the subject of intense national media scrutiny, news stories, and internet blog posts.

50. The day following his arrest, Mark's largest client, Trustmark National Bank, moved all of its business away from Mark, resulting in a complete collapse of his law practice.

51. Mark began to lose sleep, and became depressed. After his arrest, Mark's doctor prescribed a number of medications for sleep, depression, and anti-anxiety assistance.

52. Robin experienced similar symptoms, and was also prescribed medication for her anxiety.

53. Mark expressed concern and help for his wife, Robin, throughout the stressful ordeal of his arrest.

54. During the days following his arrest, Mark had a group of supportive male friends who often met for breakfast, lunch or for leisure activities such as riding bicycles. Mark and his friends communicated often, and the range of supportive friends who were communicating via text messages and emails with him grew throughout the time frame of his arrest. Despite his dire situation, Mark continued with his positive and uplifting communication to others despite his current personal challenges, even up until and on the date of his sudden death.

55. Mark communicated via text with his son on the date of his death, showing enthusiasm and interest in his son's pictures of his visit to Washington, D.C.

56. On June 27, 2014, Robin awoke and could not find Mark in the house.

57. Robin continued searching and then found her husband of 31 years dead in a storage room, with a bullet hole through his head.

58. Robin had to call her sons Owen and William to inform them that their father was dead.

59. Mark Mayfield's death was ruled a suicide.

THE 2014 U.S. SENATE RACE

60. In 2014, Mississippi State Senator Chris McDaniel decided to challenge United States Senator Thad Cochran in the Republican primary. Senator Cochran had held that office since 1978.

61. McDaniel, a younger upstart, quickly gained some notoriety in social and other media.

62. The Republican establishment lined up behind Cochran, including Butler Snow LLP, Clark, and Haley Barbour, as well as his nephews Austin Barbour and Henry Barbour.

63. In contrast to the Republican establishment and powerhouse money behind the Cochran campaign, McDaniel's base was the Mississippi Tea Party and other anti-establishment Republicans.

64. McDaniel was leading in the polls against Cochran.

65. McDaniel quickly found himself attacked by a barrage of ads from the Thad Cochran Campaign and the Barbour-run Thad Cochran Super PAC.

66. Beginning in January or February 2014, some Tea Party activists and McDaniel supporters, including John Mary, decided to hatch a plan to do some digging and make an anti-Cochran attack ad on their own.

67. Knowing of rumors that, while his wife lay in bed in the Sienna nursing home building of St. Catherine's Village, Senator Cochran traveled about with a female companion on his staff, Mary decided to further investigate and look for proof.

68. Mary was introduced to Richard Sager, another Mississippi Tea Party conservative, and the two decided that, if they could get into Mrs. Cochran's nursing home room and get a photograph of her, they could expose Senator Cochran.

69. Mary and Sager enlisted conservative blogger Clayton Kelly, who also saw the opportunity to build the audience for his "Constitutional Clayton" blog and YouTube channel, in the plan to post the information they found.

RICHARD WILBOURN, AND THE ARREST OF MARK MAYFIELD

70. Richard Wilbourn, III ("Wilbourn") is a wealthy attorney who has both deep pockets and deep political connections.

71. Wilbourn was involved with the Tea Party and befriended Mark Mayfield after they became acquainted through Tea Party activities. Mark, always kind and generous, invited Wilbourn and his girls to join Mark and his family for dinners, tailgating at Ole Miss ball games, and spending time at the Mayfields' Oxford condo.

72. Wilbourn knew that Senator Cochran's wife lived at St. Catherine's Village, where Mark Mayfield's mother also resided.

73. Wilbourn, like others, thought that exposing Senator Cochran's rumored affair would help McDaniel in his campaign.

74. On information and belief, in early spring 2014, Wilbourn approached Roy Nicholson, chairman of the Mississippi Tea Party, with the idea that someone should try to obtain a photograph of Rose Cochran at St. Catherine's, but Nicholson responded that McDaniel would not approve.

75. Upon information and belief, Wilbourn told John Mary that he should contact Mark Mayfield in order to help Clayton Kelly obtain photographs of Rose Cochran. John Mary contacted Mark via Facebook message.

76. Wilbourn asked Mark to help Wilbourn learn where Mrs. Cochran's room was.

77. After Mark's mother passed away on March 16, 2014, Wilbourn capitalized on the opportunity, asking Mark to meet him at St. Catherine's Village when Mark went to clean out his mother's room.²

78. On information and belief, Mark and Wilbourn were at St. Catherine's on a Sunday afternoon in April 2014, and Mark pointed Wilbourn down the hall on the second floor to where Rose Cochran's room was.

79. Mark, having done all he agreed to (show where the room was), said he would do nothing further; Wilbourn assured Mark he would take everything from there.

80. Wilbourn said that he had a guy (later discovered to be Clayton Kelly) who Wilbourn would then talk through gaining access past security to take photographs of Mrs. Cochran in her bed.

81. On or about March 27, John Mary told Clayton Kelly that he should be getting a call. Kelly contacted Mary to tell him he was receiving calls from a blocked number and that caller, who was not Mark, left a voicemail claiming to have information on Mrs. Cochran. Kelly, however, said he was expecting a call from Mark and would not answer the blocked number.

82. Mary let Kelly know that he did not know who the caller with information is, but instructed Kelly to answer all calls, including those from blocked numbers.

² Despite Plaintiffs' best efforts to obtain them, the St. Catherine's videos from this date have gone missing.

83. Using a blocked phone number, and pretending to be "Mark," Wilbourn gave the information on the layout of the nursing home to Clayton Kelly.
84. After two failed attempts, Kelly was able to gain access to Mrs. Cochran's room on Easter Sunday and take cell phone video of her in her bed.
85. Shortly thereafter, Kelly posted a video on YouTube that included a still photo from that video. It quickly gained attention, but was just as quickly taken down.
86. On May 14, 2014, Wilbourn sent Mark an email message referencing Senator Cochran having a mistress and referring to Rose Cochran's room number at St. Catherine's.
87. On May 16, 2014, Kelly was arrested and charged with felony exploitation of a vulnerable adult.
88. That same day, Wilbourn and Mark had planned to do some campaigning for McDaniel during skull races at the Ross Barnett Reservoir.
89. After they finished, Mark got a call from Wilbourn. Wilbourn said Mark had left something at his house and needed to come pick it up.
90. Once there, Wilbourn told Mark that they could no longer have contact with each other and cut ties. Seeing arrests being made and the players start to be revealed, Wilbourn clearly wanted to avoid any implication in the Rose Cochran Incident and started hiding his tracks.
91. On May 22, 2014, John Mary, Richard Sager, and Mark Mayfield were also arrested for conspiracy to commit felony exploitation of a vulnerable adult.
92. Having abandoned Mark in his time of need, after Mark's arrest, Wilbourn left a handwritten note on the Mayfields' front door saying he was sorry this had happened. Mark asked Robin to shred it.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

Robin Mayfield, Owen Mayfield, William Mayfield,
and The Estate of Mark Stevens Mayfield

Plaintiff(s)

v.

Butler Snow LLP, Donald Clark, Jr., The City of
Madison, Mississippi, Mary Hawkins-Butler,
Individually and In Her Official Capacity, et al

Defendant(s)

Civil Action No. 3:17cv 514CWR-FKB

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Butler Snow LLP
c/o Thomas E. Williams, Registered Agent
1020 Highland Colony Parkway, Suite 1400
Ridgeland, MS 39157-2139

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Dorsey R. Carson, Jr.
Julie C. Skipper
Carson Law Group
125 S. Congress Street, Suite 1336
Jackson, MS 39201

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ARTHUR JOHNSTON

CLERK OF COURT

Date: JUN 28 2017



Signature of Clerk or Deputy Clerk

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To: *(Defendant's name and address)* Donald Clark, Jr.
2046 Brecon Drive
Jackson, MS 39211

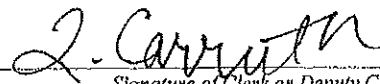
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Defendant(s)

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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* The City of Madison, Mississippi
c/o Susan Crandall
City Clerk/Director of Finance and Administration
Madison, MS 39110

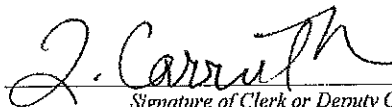
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Dorsey R. Carson, Jr.
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Carson Law Group
125 S. Congress Street, Suite 1336
Jackson, MS 39201

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Defendant(s)

Civil Action No. 3:17 cv 514 CWR-FKB

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Mary Hawkins-Butler
238 N. Castle Drive
Madison, MS 39110

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Dorsey R. Carson, Jr.
Julie C. Skipper
Carson Law Group
125 S. Congress Street, Suite 1336
Jackson, MS 39201

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Defendant(s)

Civil Action No. 3:17cv514CWR-FKB

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Police Chief Gene Waldrop
2001 Main Street
Madison, MS 39110

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Dorsey R. Carson, Jr.
Julie C. Skipper
Carson Law Group
125 S. Congress Street, Suite 1336
Jackson, MS 39201

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Defendant(s)

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SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Chuck Harrison
2001 Main Street
Madison, MS 39110

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Dorsey R. Carson, Jr.
Julie C. Skipper
Carson Law Group
125 S. Congress Street, Suite 1336
Jackson, MS 39201

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ARTHUR JOHNSTON

CLERK OF COURT

[Handwritten Signature]
Signature of Clerk or Deputy Clerk

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Defendant(s)

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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Vickie Currie
2001 Main Street
Madison, MS 39110

A lawsuit has been filed against you.

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Julie C. Skipper
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Defendant(s)

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SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Richard Wilbourn, III
206 Jefferson Ridge
Ridgeland, MS 39157

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

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ARTHUR JOHNSTON
CLERK OF COURT

Date:

JUN 28 2017

J. Carruth
Signature of Clerk or Deputy Clerk