

**IN THE SUPERIOR COURT OF THE STATE OF RIDGEWAY  
IN AND FOR RIDGEWAY COUNTY**

CODETHESCRIPter,  
*Plaintiff,*

v.

TACTICALDANKPATRIOT, in his  
quasi-official capacity as Senior Trooper in the  
Ridgeway State Police,  
*Defendant.*

No. RSC-CV-

**COMPLAINT**

CodeTheScripter, by and through undersigned counsel, hereby brings this action against TacticalDankPatriot and in support thereof alleges as follows—

**STATEMENT OF FACTS<sup>1</sup>**

1. On May 15, 2024, CodeTheScripter ("Plaintiff") parked his black Actilla Sport in or nearby a road in Palmer, Ridgeway County, Ridgeway.
2. After the vehicle was left unattended by Plaintiff, TacticalDankPatriot ("Defendant") conducted a search of Plaintiff's vehicle.
3. Defendant had not obtained a warrant, writ, or similar order by a competent tribunal authorizing this search.
4. During the search, Defendant seized the following items stored in the vehicle:
  - a. an RCU duffle bag;
  - b. an RCU duffle bag;
  - c. an RCU duffle bag;
  - d. traceable cash;
  - e. traceable cash.
5. Plaintiff did consent to the search of his vehicle nor the seizure of his private property as described fully and in detail above.
6. At all times herein, Defendant acted without legal reason or justification.
7. At all times herein, Defendant's conduct was unconsensual.
8. At all times herein, Defendant's conduct was constitutionally void.
9. Defendant is certified as a peace officer by the Law Enforcement Training Center

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<sup>1</sup> The allegations contained under this heading are chronologically ordered.

(“LETC”) and underwent thorough training and education in the same.

10. The LETC includes—as part of its regular curriculum—education and/or training on the scope of the authority of peace officers to conduct searches and seizures.

11. Defendant's search of Plaintiff's vehicle was unauthorized and Defendant knew the search to be unauthorized.

### **JURISDICTION AND VENUE**

12. The Court has original jurisdiction over this Complaint under Article V, Section IV of the Ridgeway Constitution.

13. The Court's jurisdiction is invoked in equity.

14. Venue is proper in this Court because the actions and omissions alleged in this Complaint occurred in the State of Ridgeway.

### **PARTIES**

15. Plaintiff CodeTheScripter is a resident of the State of Ridgeway and an individual.

16. Defendant TacticalDankPatriot is a Senior Trooper in the Ridgeway State Police.

### **FIRST CAUSE OF ACTION**

#### **Official Misconduct**

#### **(Violation of Rid. Civil Claims Act, 1 R. Stat. § 3114)**

17. Plaintiff incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

18. The Ridgeway Constitution gives to persons the right “to hold ... their ... possessions, free from search or seizure.” Rid. Const. Art. I, Sec. III. Defendant searched Plaintiff's vehicle without a warrant or other legal cause and thus violated Plaintiff's right under the Ridgeway Constitution against illegal searches. Defendant's act was unauthorized and Defendant knew the act to be unauthorized by reason of his educational background in the LETC.

19. Plaintiff is entitled to compensatory damages and punitive damages.

### **SECOND CAUSE OF ACTION**

#### **Official Misconduct**

#### **(Violation of Rid. Civil Claims Act, 1 R. Stat. § 3114)**

20. Plaintiff incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

21. The Ridgeway Constitution gives to persons the right “to hold ... their ... possessions, free from search or seizure.” Rid. Const. Art. I, Sec. III. Defendant seized an RCU duffle bag

without a warrant or other legal cause and thus violated Plaintiff's right under the Ridgeway Constitution against illegal seizures. Defendant's act was unauthorized and Defendant knew the act to be unauthorized by reason of his educational background in the LETC.

22. Plaintiff is entitled to compensatory damages and punitive damages.

**THIRD CAUSE OF ACTION**  
**Official Misconduct**  
**(Violation of Rid. Civil Claims Act, 1 R. Stat. § 3114)**

23. Plaintiff incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

24. The Ridgeway Constitution gives to persons the right "to hold ... their ... possessions, free from search or seizure." Rid. Const. Art. I, Sec. III. Defendant seized another RCU duffle bag without a warrant or other legal cause and thus violated Plaintiff's right under the Ridgeway Constitution against illegal seizures. Defendant's act was unauthorized and Defendant knew the act to be unauthorized by reason of his educational background in the LETC.

25. Plaintiff is entitled to compensatory damages and punitive damages.

**FOURTH CAUSE OF ACTION**  
**Official Misconduct**  
**(Violation of Rid. Civil Claims Act, 1 R. Stat. § 3114)**

26. Plaintiff incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

27. The Ridgeway Constitution gives to persons the right "to hold ... their ... possessions, free from search or seizure." Rid. Const. Art. I, Sec. III. Defendant seized another RCU duffle bag without a warrant or other legal cause and thus violated Plaintiff's right under the Ridgeway Constitution against illegal seizures. Defendant's act was unauthorized and Defendant knew the act to be unauthorized by reason of his educational background in the LETC.

28. Plaintiff is entitled to compensatory damages and punitive damages.

**FIFTH CAUSE OF ACTION**  
**Official Misconduct**  
**(Violation of Rid. Civil Claims Act, 1 R. Stat. § 3114)**

29. Plaintiff incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

30. The Ridgeway Constitution gives to persons the right "to hold ... their ... possessions, free from search or seizure." Rid. Const. Art. I, Sec. III. Defendant seized traceable cash without

a warrant or other legal cause and thus violated Plaintiff's right under the Ridgeway Constitution against illegal seizures. Defendant's act was unauthorized and Defendant knew the act to be unauthorized by reason of his educational background in the LETC.

31. Plaintiff is entitled to compensatory damages and punitive damages.

**SIXTH CAUSE OF ACTION**  
**Official Misconduct**  
**(Violation of Rid. Civil Claims Act, 1 R. Stat. § 3114)**

32. Plaintiff incorporates by reference each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

33. The Ridgeway Constitution gives to persons the right "to hold ... their ... possessions, free from search or seizure." Rid. Const. Art. I, Sec. III. Defendant seized another amount of traceable cash without a warrant or other legal cause and thus violated Plaintiff's right under the Ridgeway Constitution against illegal seizures. Defendant's act was unauthorized and Defendant knew the act to be unauthorized by reason of his educational background in the LETC.

34. Plaintiff is entitled to compensatory damages and punitive damages.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays as follows—

- A. For awardment of compensatory damages (including attorney's fees and costs);
- B. For awardment of punitive damages;
- C. For a permanent restraining order pursuant to 1 R. Stat. § 3114(ii) restraining Defendant from conducting further unlawful searches and seizures;
- D. For such other and further relief as the Court deems appropriate.

DATED: JUNE 9, 2024  
Palmer County Hall

**TOBY SAWYER POPPLEWELL LLP**

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