

IN THE CIRCUIT COURT OF THE THIRD
JUDICIAL CIRCUIT OF FLORIDA, IN AND
FOR TAYLOR COUNTY, FLORIDA.

STATE OF FLORIDA

CASE NO.

-vs-

AGENCY CASE NO. 18-17877

Steven S. Hall

Defendant(s).

RACE/SEX: White/MALE

DOB: [REDACTED]
[REDACTED]

AFFIDAVIT FOR ARREST

Before me, Circuit Judge Jennifer Johnson personally appeared Inspector Chris McGauley, who being first duly sworn, deposes and says:

COUNT I

That Steven S. Hall, a Correctional Officer acting in his official position as a public servant did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there with malicious intent batter Inmate [REDACTED] while Inmate [REDACTED] was housed at Taylor Correctional Institution, contrary to Florida Statute 944.35(3)(a)1.

COUNT II

That Steven S. Hall, a Correctional Officer acting in his official position as a public servant did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there unlawfully falsify his Use of Force Report and Incident Report (*Official State Documents*) while working at Taylor Correctional Institution, contrary to Florida Statute 839.13(2)(a)

On October 13, 2018, while being escorted to confinement by Officer Kenneth Hightower and Sergeant Richard Tuten, Inmate [REDACTED]

[REDACTED]


Sergeant Tuten and Sergeant Hall both wrote independent Incident Reports documenting similarly, Inmate [REDACTED] was violently resisting officers which resulted in their use of physical and chemical force. Both allege Inmate [REDACTED] was combative and Sergeant Hall gave several verbal orders before he administered chemical agents. Neither Sergeants Hall or Tuten documented any physical punches or kicks administered by them on Inmate [REDACTED] in their reports, and made no mention of Officer Hightower being involved or even being present. Officer Hightower did not document his

involvement either.

Several staff witnesses and an inmate were interviewed independently and all testified similarly, corroborating Inmate [REDACTED] account, and at no time was Inmate [REDACTED] combative or resistant. One staff eye witness who was approximately 40 yards away, never heard or saw Inmate [REDACTED] do anything to warrant the attack on him by Sergeants Hall, Tuten, and Officer Hightower. An additional staff witness clearly observed Sergeant Tuten deliver knee strikes to Inmate [REDACTED] midsection despite Inmate [REDACTED] not resisting.

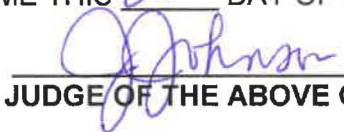
Investigation revealed during this incident Inmate [REDACTED] never resisted the officers or gave reason for force to be used against him; therefore, the Use of Force by Sergeant Tuten, Officer Hightower, and Officer Hall was unjustified. This was corroborated by independent testimony of inmates and security staff as well as physical injuries consistent with the abuse (*Inmate [REDACTED] sustained two black eyes, a laceration to the lip, and abrasions about the face and head*).

WHEREFORE, your Affiant prays that an arrest warrant be issued according to law commanding all and singular the Sheriffs of the State of Florida to forthwith arrest the said Steven S. Hall, and bring him before the court to answer the charges of: malicious intent Battery on an Inmate and unlawfully falsify his Use of Force Report and Incident Report (*Official State Documents*).



AFFIANT

SWORN TO AND SUBSCRIBED BEFORE ME THIS 21st DAY OF November, 2018.



JUDGE OF THE ABOVE COURT

IN THE CIRCUIT COURT OF THE THIRD
JUDICIAL CIRCUIT OF FLORIDA, IN AND
FOR TAYLOR COUNTY, FLORIDA.

STATE OF FLORIDA

CASE NO.

-vs-

AGENCY CASE NO. 18-17877

Steven S. Hall

Defendant(s).

RACE/SEX: White/MALE

DOB: [REDACTED]

SSN: [REDACTED]

ARREST WARRANT

IN THE NAME OF THE STATE OF FLORIDA, TO ALL AND SINGULAR SHERIFFS OF THE
STATE OF FLORIDA:

HAVING RECEIVED AND CONSIDERED THE SWORN AFFIDAVIT OF INSPECTOR CHRIS
MCGAULEY, DATED THE DAY OF 21st NOVEMBER, 2018, SAID AFFIDAVIT ALLEGING:

COUNT I

That Steven S. Hall, a Correctional Officer acting in his official position as a public servant
did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there with
malicious intent battered Inmate [REDACTED] DC [REDACTED] while Inmate [REDACTED] was housed
at Taylor Correctional Institution, contrary to Florida Statute 944.35(3)(a)1.

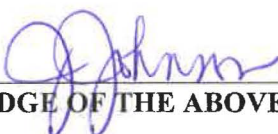
COUNT II

That Steven S. Hall, a Correctional Officer acting in his official position as a public servant
did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there
unlawfully falsify his Use of Force Report and Incident Report (*Official State Documents*), while
working at Taylor Correctional Institution, contrary to Florida Statute 839.13(2)(a).

THESE ARE THEREFORE TO COMMAND YOU TO FORTHWITH ARREST AND BRING THE
ABOVE NAMED DEFENDANT BEFORE ME TO BE DEALT WITH ACCORDING TO THE LAW.

GIVEN UNDER MY HAND AND SEAL THIS 21st DAY OF NOVEMBER, 2018 AT TAYLOR
COUNTY, FLORIDA

BAIL BOND IS FIXED AT \$ _____
 BOND IS TO BE FIXED AT FIRST APPEARANCE



JUDGE OF THE ABOVE COURT

IN THE CIRCUIT COURT OF THE THIRD
JUDICIAL CIRCUIT OF FLORIDA, IN AND
FOR TAYLOR COUNTY, FLORIDA.

STATE OF FLORIDA

CASE NO.

-vs-
Kenneth Hightower

AGENCY CASE NO. 18-17877

Defendant(s).
RACE/SEX: White/MALE
DOB: [REDACTED]
[REDACTED]

AFFIDAVIT FOR ARREST

Before me, Circuit Judge Jennifer Johnson, personally appeared Inspector Chris McGauley, who being first duly sworn, deposes and says:

COUNT I

That Kenneth Hightower, a Correctional Officer acting in his official position as a public servant did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there with malicious intent batter Inmate [REDACTED] DC [REDACTED] while Inmate [REDACTED] was housed at Taylor Correctional Institution, contrary to Florida Statute 944.35(3)(a)1.

On October 13, 2018, while being escorted to confinement by Officer Kenneth Hightower and Sergeant Richard Tuten, Inmate [REDACTED] [REDACTED]

Sergeant Tuten and Sergeant Hall both wrote independent Incident Reports documenting similarly, Inmate [REDACTED] was violently resisting officers which resulted in their use of physical and chemical force. Both allege Inmate [REDACTED] was combative and Sergeant Hall gave several verbal orders before he administered chemical agents. Neither Sergeants Hall or Tuten documented any physical punches or kicks administered by them on Inmate [REDACTED] in their reports, and made no mention of Officer Hightower being involved or even being present. Officer Hightower did not document his involvement either.

Several staff witnesses and an inmate were interviewed independently and all testified similarly, corroborating Inmate [REDACTED] account, and at no time was Inmate [REDACTED] combative or resistant. One staff eye witness who was approximately 40 yards away, never heard or saw Inmate [REDACTED] do anything to warrant the attack on him by Sergeants Hall, Tuten, and Officer Hightower. An additional staff witness clearly observed Sergeant Tuten deliver knee strikes to Inmate [REDACTED]

██████████ midsection despite Inmate ██████████ not resisting.

Investigation revealed during this incident Inmate ██████████ never resisted the officers or gave reason for force to be used against him; therefore, the Use of Force by Sergeant Tuten, Officer Hightower, and Officer Hall was unjustified. This was corroborated by independent testimony of inmates and security staff as well as physical injuries consistent with the abuse (*Inmate ██████████ sustained two black eyes, a laceration to the lip, and abrasions about the face and head*).

WHEREFORE, your Affiant prays that an arrest warrant be issued according to law commanding all and singular the Sheriffs of the State of Florida to forthwith arrest the said Kenneth Hightower, and bring him before the court to answer the charges of: malicious intent battery on an Inmate.



AFFIANT

SWORN TO AND SUBSCRIBED BEFORE ME THIS 21st DAY OF November, 2018.



JUDGE OF THE ABOVE COURT

IN THE CIRCUIT COURT OF THE THIRD
JUDICIAL CIRCUIT OF FLORIDA, IN AND
FOR TAYLOR COUNTY, FLORIDA.

STATE OF FLORIDA

CASE NO.

-vs-

AGENCY CASE NO. 18-17877

Kenneth Hightower

Defendant(s).

RACE/SEX: White/MALE

DOB: [REDACTED]

SSN: [REDACTED]

ARREST WARRANT

IN THE NAME OF THE STATE OF FLORIDA, TO ALL AND SINGULAR SHERIFFS OF THE
STATE OF FLORIDA:

HAVING RECEIVED AND CONSIDERED THE SWORN AFFIDAVIT OF INSPECTOR CHRIS
MCGAULEY, DATED THE DAY OF 21st NOVEMBER, 2018, SAID AFFIDAVIT ALLEGING:

COUNT I


That Kenneth Hightower, a Correctional Officer acting in his official position as a public
servant did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there
with malicious intent battered Inmate [REDACTED] DO [REDACTED], while Inmate [REDACTED] was
housed at Taylor Correctional Institution, contrary to Florida Statute 944.35(3)(a)1.

THESE ARE THEREFORE TO COMMAND YOU TO FORTHWITH ARREST AND BRING THE
ABOVE NAMED DEFENDANT BEFORE ME TO BE DEALT WITH ACCORDING TO THE LAW.

GIVEN UNDER MY HAND AND SEAL THIS 21st DAY OF NOVEMBER, 2018 AT TAYLOR
COUNTY, FLORIDA

BAIL BOND IS FIXED AT \$ _____

BOND IS TO BE FIXED AT FIRST APPEARANCE



JUDGE OF THE ABOVE COURT

IN THE CIRCUIT COURT OF THE THIRD
JUDICIAL CIRCUIT OF FLORIDA, IN AND
FOR TAYLOR COUNTY, FLORIDA.

STATE OF FLORIDA

CASE NO.

-vs-

AGENCY CASE NO. 18-17877

Richard Tuten

Defendant(s).

RACE/SEX: White/MALE

DOB: [REDACTED]
[REDACTED]

AFFIDAVIT FOR ARREST

Before me, Circuit Judge Jennifer Johnson, personally appeared Inspector Chris McGauley, who being first duly sworn, deposes and says:

COUNT I

That Richard Tuten, a Correctional Sergeant acting in his official position as a public servant did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there with malicious intent batter Inmate [REDACTED] while Inmate [REDACTED] was housed at Taylor Correctional Institution, contrary to Florida Statute 944.35(3)(a)1.

COUNT II

That Richard Tuten, a Correctional Sergeant acting in his official position as a public servant did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there unlawfully falsify his Use of Force Report and Incident Report (*Official State Documents*) while working at Taylor Correctional Institution, contrary to Florida Statute 839.13(2)(a)

On October 13, 2018, while being escorted to confinement by Officer Kenneth Hightower and Sergeant Richard Tuten, Inmate [REDACTED]

[REDACTED]

Sergeant Tuten and Sergeant Hall both wrote independent Incident Reports documenting similarly, Inmate [REDACTED] was violently resisting officers which resulted in their use of physical and chemical force. Both allege Inmate [REDACTED] was combative and Sergeant Hall gave several verbal orders before he administered chemical agents. Neither Sergeants Hall or Tuten documented any physical punches or kicks administered by them on Inmate [REDACTED] in their reports, and made no mention

of Officer Hightower being involved or even being present. Officer Hightower did not document his involvement either.

Several staff witnesses and an inmate were interviewed independently and all testified similarly, corroborating Inmate [REDACTED] account, and at no time was Inmate [REDACTED] combative or resistant. One staff eye witness who was approximately 40 yards away, never heard or saw Inmate [REDACTED] do anything to warrant the attack on him by Sergeants Hall, Tuten, and Officer Hightower. An additional staff witness clearly observed Sergeant Tuten deliver knee strikes to Inmate [REDACTED] midsection despite Inmate [REDACTED] not resisting.

Investigation revealed during this incident Inmate [REDACTED] never resisted the officers or gave reason for force to be used against him; therefore, the Use of Force by Sergeant Tuten, Officer Hightower, and Officer Hall was unjustified. This was corroborated by independent testimony of inmates and security staff as well as physical injuries consistent with the abuse (*Inmate [REDACTED] sustained two black eyes, a laceration to the lip, and abrasions about the face and head*).

WHEREFORE, your Affiant prays that an arrest warrant be issued according to law commanding all and singular the Sheriffs of the State of Florida to forthwith arrest the said Richard Tuten, and bring him before the court to answer the charges of: malicious intent Battery on Inmate and unlawfully falsify his Use of Force Report and Incident Report (*Official State Documents*).



AFFIANT

SWORN TO AND SUBSCRIBED BEFORE ME THIS 21st DAY OF November, 2018



JUDGE OF THE ABOVE COURT

IN THE CIRCUIT COURT OF THE THIRD
JUDICIAL CIRCUIT OF FLORIDA, IN AND
FOR TAYLOR COUNTY, FLORIDA.

STATE OF FLORIDA

CASE NO.

-vs-

AGENCY CASE NO. 18-17877

Richard Tuten

Defendant(s).
RACE/SEX: White/MALE
DOB: [REDACTED]
SSN: [REDACTED]

ARREST WARRANT

IN THE NAME OF THE STATE OF FLORIDA, TO ALL AND SINGULAR SHERIFFS OF THE
STATE OF FLORIDA:

HAVING RECEIVED AND CONSIDERED THE SWORN AFFIDAVIT OF INSPECTOR CHRIS
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COUNT I

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did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there with
malicious intent battered Inmate [REDACTED] while Inmate [REDACTED] was housed at
Taylor Correctional Institution, contrary to Florida Statute 944.35(3)(a)1.

COUNT II

That Richard Tuten, a Correctional Sergeant acting in his official position as a public servant
did on or about the 13th day of October, 2018, in Taylor County, Florida, did then and there
unlawfully falsify his Use of Force Report and Incident Report (*Official State Documents*), while
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JUDGE OF THE ABOVE COURT