

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA

JANE DOE No. 1,

Case No.

Judge:

v.

**THE WEST VIRGINIA
STATE POLICE, JOSHUA
ELDRIDGE, ROBERT
PERRY, JAMES LEE,
JOSEPH COMER, AND
UNKNOWN JOHN DOE(S),**

Defendants.

COMPLAINT

NOW COMES, the Plaintiff, Jane Doe No. 1, by and through her counsel Teresa C. Toriseva, Esq. and Joshua D. Miller, Esq. of Toriseva Law, Kelly R. Reed, Esq. and Traci M. Cook, Esq. of the Law Offices of Kelly R. Reed, and J. Bryan Edwards of Cranston & Edwards, PLLC and file this Complaint against the Defendants, and so state and allege:

PREFATORY COMMENT

The West Virginia State Police is the top law enforcement agency in West Virginia. West Virginians expect and deserve the State Police to conduct itself using the highest standards of conduct in all aspects of law enforcement. This includes the training of the next class of law enforcement officers and treating all law enforcement officers with the respect they deserve. It is clear with the public disclosure of a hidden video camera in the women's shower and locker facilities at the Training Academy the State Police has let its female law enforcement recruits, officers, employees, and civilians down. The destruction of evidence of the unlawful videotaping is another failure by the State Police of its duty to protect evidence and investigate crimes. There

is a culture of misconduct toward women at the West Virginia State Police and it is believed that it infects all aspects of the organization and the State Police Training Academy.

PARTIES

1. The Plaintiff files this action anonymously to protect herself from retaliation, targeting, harassment, public outrage, and for fear of her own safety.
2. While it can be stated that she is an adult individual female that at all relevant times resided in West Virginia, undersigned counsel will not release the Plaintiff's identity unless specifically ordered to do so by a Court.
3. The West Virginia State Police is a state agency under the laws of the State of West Virginia, by which name it may sue and be sued, plead and be impleaded and contract and be contracted with.
4. Upon information and belief Defendant Joshua Eldridge is a resident of West Virginia and an employee of the West Virginia State Police.
5. Upon information and belief Defendant Robert Perry is a resident of West Virginia and an employee of the West Virginia State Police.
6. Upon information and belief Defendant James Lee is a resident of Florida and a former employee of the West Virginia State Police. Defendant James Lee was an employee of the West Virginia State Police at all times relevant herein.
7. Upon information and belief Defendant Joseph Comer is a resident of West Virginia and an employee of the West Virginia State Police.
8. Defendant(s) John Doe(s) is/are unknown individual(s) who conspired with the named defendants in order to commit the tortious described in this Complaint. Specifically, upon

information and belief, Defendant(s) John Doe(s) conspired to install and operate a hidden camera within the female shower and locker facility of the West Virginia State Police training academy. The Plaintiff reasonably believes that other individuals, whose identities are unknown at this time, conspired to install and operate a hidden camera, and/or knew of the installation and operation of the hidden camera and did nothing, and/or viewed and shared images and videos recorded by the hidden camera in the locker and shower facilities at the training academy. The Plaintiff's claims against the Defendants John Does arise out of the same conduct, transactions, and occurrences as do her claims against the other named defendants. The Plaintiff intends to amend her Complaint to specifically include any other individual that she identifies as being a part of the conspiracy to commit the tortious conduct alleged in this Complaint.

9. There is no applicable statutory immunity from this lawsuit for the Defendants.

JURISDICTION AND VENUE

10. The minimal jurisdictional amount for this filing is satisfied.
11. Venue is proper in this Court pursuant to W. Va. Code § 56-1-1(a).
12. Pursuant to W. Va. Code § 56-1-1(a), “[a]ny civil action or other proceeding, except where it is otherwise specially provided, may hereafter be brought in the circuit court of any county... [w]herein any of the defendants may reside or the cause of action arose...”

FACTUAL BACKGROUND

West Virginia State Police Training Academy

13. The West Virginia State Police was founded in 1919 and is the nation's fourth oldest state police organization.
14. The West Virginia State Police training academy was opened in 1947.
15. The first graduating class of officers from the academy was in 1949.
16. Females have always been a minority in training classes and in West Virginia's various law enforcement departments and offices.
17. Furthermore, women have always been in the minority for the civilian employees employed by the West Virginia State Police.

Plaintiff's Experience at the Training Academy

18. The Plaintiff is a current employee of the West Virginia State Police.
19. The Plaintiff regularly utilized the female shower and locker facilities at the training academy during all times relevant to this action.
20. Unbeknownst to the Plaintiff, a hidden camera was placed in the female shower and locker facilities at the training academy.
21. The Plaintiff is known to have been videotaped while using the female shower and locker facilities. The hidden camera videotaped the Plaintiff shower and otherwise in a state of nudity.
22. At no time did the Plaintiff give her permission or otherwise consent to being videotaped, or otherwise recorded, while using the female locker or shower facilities at the training academy.

23. Unlike many other cadets or employees of the West Virginia State Police, the Plaintiff never utilized the dormitory facilities at the training academy.

Illegally Obtained Footage of the Plaintiff

24. Upon information and belief, on or about January 26, 2018, Defendant Perry approached witness Jon Doe, not a party to this action, and asked him to come into an office located within the training academy in order to show him something.

25. Upon information and belief, when witness John Doe entered the office, Defendant Eldridge, Defendant Perry, and Defendant Lee told witness John Doe that “we’ve got something that you want to see.”

26. Upon information and belief, Defendant Eldridge, Defendant Perry, and Defendant Lee then proceeded to show witness John Doe a video that was surreptitiously recorded on a hidden camera.

27. Upon information and belief, the footage shown to witness Jon Doe was of the Plaintiff, while naked, using the female shower and locker facilities at the training academy.

28. Upon information and belief, while viewing the footage of the Plaintiff, witness John Doe expressed shock and outrage at the content of the video revealed to him towards Defendants Eldridge, Perry, and Lee.

29. Upon information and belief, as soon as witness John Doe expressed shock and outrage at the content of the video, Defendant Eldridge pulled a thumb drive containing the video of the Plaintiff from the computer, threw it on the ground, and smashed it with his boot.

30. Upon information and belief, thereafter, upon information and belief, Defendants Eldridge, Perry, and Lee lied to witness John Doe and told him that First Sergeant Joseph

George Portaro, who had died nearly two (2) years prior,¹ was the individual who had installed the hidden camera in the female locker and shower facilities because he hated the Plaintiff, that they had just found the thumb drive in First Sergeant Portaro's personal belongings, that the Plaintiff was the only individual on the video, and that the thumb drive contained the only video showing the Plaintiff.

31. Upon information and belief, at that time, witness John Doe believed that Defendants Eldridge, Perry, and Lee were being honest with him.

32. Witness Jon Doe later informed the Plaintiff about the thumb drive containing the video of her naked in the shower and locker facilities at the training academy. Witness John Doe also informed the Plaintiff exactly what Defendants Eldridge, Perry, and Lee told him.

33. Based upon the information contained in the February 2023 anonymous letter, in part, Plaintiff learned that the aforementioned statements by Defendants Eldridge, Perry, and Lee were false and misleading and were designed to dissuade Plaintiff from reporting this matter because these false and misleading statements caused Plaintiff to believe that she was the only person videotaped; that Portaro, now dead, targeted only her; that the only evidence had been destroyed; and that nobody other than Defendants Eldridge, Perry, and Lee and witness John Doe had viewed the video of her. Based on the false and misleading representations of Defendants Eldridge, Perry, and Lee, the Plaintiff believed that that the only perpetrator of the surreptitious videotaping was Portaro, now deceased, that she was the only victim, that the destroyed thumb drive was the only device containing a video, and, that the video on the destroyed thumb drive was the only video. Based on those false and misleading representations, Plaintiff chose not to take any action

¹ First Sergeant Joseph George Portaro passed away on March 14, 2016.

at that time and declined to report the matter to anyone inside or outside the West Virginia State Police in order to protect herself from any further embarrassment, humiliation, undermining of her position, and/or any retaliation.

34. At no time did the Plaintiff give her consent to be videotaped, monitored, surveilled, or otherwise recorded while using the female shower and locker facilities at the training academy.

Public Revelations of Video Camera in the Female Locker and Shower Facilities by the February Anonymous Letter

35. Based on information and belief, in or around August 2022, an anonymous letter was sent from an unknown individual, purporting to be a whistleblower, to West Virginia Governor Jim Justice's office.

36. Based on information and belief, the August 2022 anonymous letter revealed that at least one hidden camera was located in the female shower and locker facilities at the training academy.

37. Based on information and belief, the August 2022 letter received no, or alternative, very minor media attention.

38. Based on information and belief, the August 2022 letter received no response or action from Governor Justice's office.

39. In February 2023, another anonymous letter was sent to various senators, delegates, and the West Virginia Attorney General's Office. *See Exhibit A.*

40. Based on information and belief the February 2023 letter contains the same, or very similar, information as the August 2022 letter.

41. The February 2023 letter revealed that at least one hidden camera was installed in the female locker and shower facilities at the training academy.
42. The February 2023 letter also revealed that an external hard drive was found containing hours of video footage showing “female students and female troopers” using the female shower and locker facilities at the training academy. *See Exhibit A* (Emphasis added).
43. Additionally, the February 2023 letter indicated that the camera, hard drive, and other evidence regarding the hidden camera had been intentionally destroyed by agents of the West Virginia State Police.
44. Sometime before February 2023, the West Virginia State Police conducted an internal investigation into the hidden camera(s).
45. Upon information and belief, the West Virginia State Police’s investigation was designed to cover up the existence of the camera(s).
46. Upon information and belief, none of the perpetrators who installed or operated the hidden camera(s) and/or were aware of its installation or operation were disciplined or reprimanded.
47. Upon information and belief, the West Virginia State Police did not inform any of the individuals who were or may have been videotaped of the existence of the hidden camera and/or of video footage depicting them.
48. Upon information and belief, the West Virginia State Police destroyed the evidence in order to cover up the existence of the hidden camera(s) and the video footage of the individuals depicted on such.

49. Soon after the February 2023 letter started to receive media attention, Governor Justice's office confirmed that the West Virginia State Police did destroy evidence of the hidden camera.
50. Specifically, on March 21, 2023, Governor Justice's Chief of Staff Brian Abraham stated that "high-ranking individuals at the State Police destroyed evidence."
51. Only after the February 2023 anonymous letter did the Plaintiff learn that Defendants Eldridge, Perry, and Lee intentionally lied and misled both witness John Doe and the Plaintiff regarding as to the extent of the hidden camera(s) in the shower and locker facilities and whether other women were unlawfully videotaped. Upon information and belief, the Plaintiff believes that she was lied to and misled about the identity of the individual responsible for the placement of the hidden camera; who knew about and/or participated in the placement of the hidden camera; that individuals in addition to Portaro knew and/or were involved in the placement of the hidden camera during installation and/or operation of it; that there was an external hard drive that contained additional videos of Plaintiff, as well as other victims; and, that the knowledge and/or viewing of these videos of Plaintiff and others was widespread.
52. Based on information and belief, the Plaintiff believes that while the February 2023 anonymous letter, attached as **Exhibit A**, First Sergeant Joseph George Portaro was named as the individual who installed the hidden camera, other individuals were involved with the installation and operation of the hidden camera.
53. Based on information and belief, the Plaintiff believes that individuals other than First Sergeant Joseph George Portaro conspired to install and operate the hidden camera(s) in the female locker and shower facility at the training academy to record and view, for their

sexual gratification, as well as that of other individuals whose identities are unknown at this time, any and all women using those facilities.

54. Based on information and belief, the Plaintiff believes that individuals who are responsible for the installation and operation of the hidden camera(s) and/or who knew of its installation and/or operation at the time of installation and/or operation have attempted to blame everything related to the hidden camera on First Sergeant Joseph George Portaro as he is now deceased and cannot defend himself.

55. Before February 2023, the Plaintiff did not know and reasonably could not have known there were other individuals involved in the installation and operation of the hidden camera(s) and/or who knew of its installation and/or operation at the time of installation and/or operation in the locker and shower facilities at the training academy and/or that these individuals engaged in the aforescribed behavior in order to videotape any and all women, including herself, for their sexual gratification and/or the gratification of others whose identity is not yet known.

56. Before February 2023, the Plaintiff did not know and reasonably could not have known there was an external hard drive or other hard drives or memory storage devices containing other illegal recordings obtained through the hidden camera(s) in the female locker and shower facilities at the training academy.

57. Before February 2023, the Plaintiff did not know and reasonably could not have known there were other individuals involved in the illegal recordings obtained through the hidden camera(s) in the female locker and shower facilities at the training academy and/or that such individuals placed the hidden camera and/or had knowledge of such at

the time and videotaped her and others for their sexual gratification and/or the sexual gratification of others whose identities are not yet known.

58. Before February 2023, the Plaintiff reasonably believed that she was the only individual illegally recorded, that the only memory device containing the only video of her was destroyed in 2018, and that the only individual involved was dead.

59. As of the time of this filing, the Plaintiff does not know whether the hidden camera(s) also recorded sound.

60. As of the time of this filing, the Plaintiff does not know when the hidden camera(s) was/were installed in the female locker and shower facilities at the training academy.

61. Based upon certain information contained in the February 2023 anonymous letter, as of the time of this filing, the Plaintiff does not know the identity of the individual(s) who installed the hidden camera(s) in the female locker and shower facilities at the training academy and/or who knew of its installation and/or operation at the time of installation and/or operation.

62. Based upon certain information contained in the February 2023 anonymous letter, as of the time of this filing, the Plaintiff does not know during what time period(s) the hidden camera(s) was/were operational in the female locker and shower facilities at the training academy.

63. Based upon certain information contained in the February 2023 anonymous letter, as of the time of this filing, the Plaintiff does not know who, other than herself, was surveilled, videotaped, or otherwise recorded in the female locker and shower facilities at the training academy.

64. Based on information and belief, the Plaintiff believes that she was videotaped, surveilled or was otherwise recorded, without her permission or consent, in the female locker and shower facilities at the training academy.

65. The hidden camera(s) illegally installed and operated in the female locker and shower facilities in the West Virginia State Police training academy will be referred to, collectively, hereinafter, as the “Recording Devices.”

66. As a direct and proximate result of Defendants’ actions and/or inactions, the Plaintiff suffered injuries and damages set forth herein.

COUNT 1: INVASION OF PRIVACY – UNREASONABLE PUBLICITY GIVEN TO

ANOTHER'S PRIVATE LIFE

PLAINTIFF V. DEFENDANT COMER

67. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

68. In the February 2023 letter, Defendant Comer gave publicity to a matter concerning the Plaintiff’s private personal life. *See Exhibit A.*

69. Defendant Comer placed the Plaintiff’s private personal life in the public’s attention in his February 2023 anonymous letter.

70. Defendant Comer stated in his anonymous letter from February 2023 that the Plaintiff was having an affair on West Virginia State Police property and that she was the reason that First Sergeant Portaro installed the hidden camera in the female shower and locker facilities at the training academy.

71. The matter publicized by Defendant Comer is highly offensive to a reasonable person.

72. The matter publicized by Defendant Comer is not of legitimate concern to the public.

73. As a direct and proximate result of Defendant Comer's actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity and shame, economic damages, diminished earning capacity and future lost wages.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

**COUNT 2: VIOLATION OF W. VA. CODE § 21-3-20 – USE OF VIDEO AND OTHER
ELECTRONIC SURVEILLANCE DEVICES BY EMPLOYERS PROHIBITED**

PLAINTIFF V. WEST VIRGINIA STATE POLICE; ELDRIDGE; PERRY; AND LEE

74. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

75. Pursuant to W. Va. Code § 21-3-20(a), "It is unlawful for any employer or the agent or representative of an employer, whether public or private, to operate any electronic surveillance device or system, including, but not limited to, the use of a closed circuit television system, a video-recording device, or any combination of those or other electronic devices for the purpose of recording or monitoring the activities of the employees in areas designed for the health or personal comfort of the employees or for safeguarding of their possessions, such as rest rooms, shower rooms, locker rooms, dressing rooms and employee lounges."

76. At all times material herein, Plaintiff was an employee of Defendant West Virginia State Police.

77. The Defendant West Virginia State Police, acting by and through its instructors, supervisors, agents, servants, employees, and representatives, including Defendants Eldridge, Perry, and Lee, and perhaps others whose identities are not yet known, installed and operated the Recording Devices in the female shower and locker facilities at the training academy and/or had knowledge of the installation and/or operation of such at the time of installation and/or operation, for the purpose of their sexual gratification and/or the sexual gratification of others whose identities are not yet known.

78. Additionally, the Defendant Eldridge, Defendant Perry, and Defendant Lee installed and operated the Recording Devices in the female shower and locker facilities at the training academy, and/or had knowledge of the installation and/or operation of such at the time of installation and/or operation, for their sexual gratification and/or the sexual gratification of others whose identities are not yet known.

79. The Defendants' purpose in operating the Recording Devices was to videotape and record and the Plaintiff and other women in an area designed to be used as private locker and shower facilities, in which Defendants knew Plaintiff and others would be naked as they showered and/or changed clothing.

80. The Defendants negligently, recklessly, willfully, wantonly, knowingly, and intentionally violated W. Va. Code § 21-3-20(a).

81. As a direct and proximate result of Defendants' actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 3: VIOLATION OF W. VA. CODE § 61-8-28 – CRIMINAL INVASION OF

PRIVACY

PLAINTIFF V. WEST VIRGINIA STATE POLICE; ELDRIDGE; PERRY; AND LEE

82. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

83. Pursuant to W. Va. Code § 61-8-28(b), “It is unlawful for a person to knowingly visually portray another person without that other person's knowledge, while that other person is fully or partially nude and is in a place where a reasonable person would have an expectation of privacy.”

84. The Defendant West Virginia State Police, acting by and through its instructors, supervisors, agents, employees, and representatives, servants, including Defendants Eldridge, Perry, and Lee, and perhaps others whose identities are not yet know, knowingly installed and operated the Recording Devices in the female shower and locker facilities at the training academy and/or had knowledge of the installation and/or operation of such at the time of the installation and/or operation of such, to visually portray Plaintiff and others in the nude, without their consent.

85. The Plaintiff had a reasonable expectation of privacy in the female locker and shower facilities of the training academy.

86. The Defendants knowingly and intentionally violated W. Va. Code § 61-8-28(b).

87. As a direct and proximate result of Defendant’s actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 4: VIOLATION OF W. VA. CODE § 61-8-28a – NONCONSENSUAL

DISCLOSURE OF PRIVATE INTIMATE IMAGES

PLAINTIFF V. WEST VIRGINIA STATE POLICE; ELDRIDGE; PERRY; AND LEE

88. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

89. Pursuant to W. Va. Code § 61-8-28a(b), “No person may knowingly and intentionally disclose, cause to be disclosed or threaten to disclose, with the intent to harass, intimidate, threaten, humiliate, embarrass, or coerce, an image of another which shows the intimate parts of the depicted person or shows the depicted person engaged in sexually explicit conduct which was captured under circumstances where the person depicted had a reasonable expectation that the image would not be publicly disclosed.”

90. The Defendant West Virginia State Police, acting by and through its instructors, supervisors, agents, employees servants, and representatives, including Defendants Eldridge, Perry, and Lee, and perhaps others whose identities are not yet known, knowingly installed and operated the Recording Devices in the female locker and shower facilities at the training academy and/or had knowledge of the installation and/or operation of such at the time of the installation and/or operation of such, to visually portray the Plaintiff and others in the nude, without their consent.

91. Defendant Eldridge, Defendant Perry, and Defendant Lee, and perhaps others whose identities are not yet known, knew of the installation of the hidden camera in the female locker and shower facilities and/or participated in the installation of the hidden camera in

the female locker and shower facilities at the training academy to visually portray the Plaintiff and others in the nude, without their consent.

92. The Defendants and perhaps others whose identities are not yet known, intentionally disclosed, or, alternatively, threatened to disclose the images, videos, and recordings of the Plaintiff with the intent to harass, intimidate, threaten, humiliate, embarrass, or coerce the Plaintiff.

93. The Plaintiff had a reasonable expectation of privacy in the female locker and shower facilities of the training academy.

94. The Defendants, and perhaps others whose identities are not yet known, knowingly and intentionally violated W. Va. Code § 61-8-28a(b).

95. As a direct and proximate result of Defendants' actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 5: COMMON LAW INVASION OF PRIVACY- INTRUSION UPON

SECLUSION

PLAINTIFF V. WEST VIRGINIA STATE POLICE; ELDRIDGE; PERRY; LEE; AND

COMER

96. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

97. The Plaintiff had a reasonable expectation of privacy in the locker and shower facilities of the training academy.

98. The Plaintiff regularly would undress and shower in the female locker and shower facilities in the training academy.

99. The Plaintiff had a reasonable expectation of privacy in that she would not be videotaped, or otherwise recorded, without her consent, by the Recording Devices.

100. The Defendant West Virginia State Police, acting by and through its instructors, supervisors, agents, employees, servants, and representatives, including Defendants Eldridge, Perry, and Lee, and perhaps others whose identities are not yet known, negligently, recklessly, willfully, wantonly, knowingly, and intentionally intruded upon the Plaintiff's seclusion by installing and operating the Recording Devices in the shower and locker facilities and/or by having knowledge of the installation and/or operation of the Recording Devices at the time of installation and/or operation.

101. Defendant Eldridge, Defendant Perry, and Defendant Lee negligently, recklessly, willfully, wantonly, knowingly, and intentionally intruded upon the Plaintiff's seclusion by their knowledge that another had installed and was operating the Recording Devices in the female shower and locker facilities at the training academy at the time of such and/or their installing and operating the Recording Devices in the shower and locker facilities.

102. Defendant Comer negligently, recklessly, willfully, wantonly, knowingly, and intentionally intruded upon the Plaintiff's seclusion by stating in his anonymous letter from February 2023 that the Plaintiff was having an affair on West Virginia State Police property and that she was the reason that First Sergeant Portaro installed the hidden camera in the female shower and locker facilities at the training academy.

103. The Defendants' method of intruding into the Plaintiff's seclusion was highly offensive to and objectionable to the reasonable person.

104. As a direct and proximate result of Defendants' actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 6: EMPLOYMENT DISCRIMINATION ON THE BASIS OF SEX

PLAINTIFF V. WEST VIRGINIA STATE POLICE

105. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

106. The Defendant West Virginia State Police violated the West Virginia Human Rights Act, W. Va. Code § 5-11-1, *et seq.* (hereinafter referred to as the "HRA").

107. The HRA protects employees, both public and private employees from discrimination on the basis of race, religion, color, national origin, ancestry, sex, age, blindness, and disability. *See* W. Va. Code § 5-11-2.

108. West Virginia Code § 5-11-9 provides that:

It shall be an unlawful discriminatory practice...:

(1) For any employer to discriminate against an individual with respect to compensation, hire, tenure, terms, conditions or privileges of employment if the individual is able and competent to perform the services required even if such individual is blind or disabled...

109. The term “discriminate” means “to exclude from, or fail or refuse to extend to, a person equal opportunities because of race, religion, color, national origin, ancestry, sex, age, blindness, disability or familial status and includes to separate or segregate.” W. Va. Code § 5-11-3(h).
110. The Defendant the West Virginia State Police is an “employer” under the HRA. W. Va. § 5-11-3(d).
111. The actions and inactions of the Defendant’s agents and employees are imputed onto the Defendant under the doctrine of *respondeat superior*.
112. The Plaintiff is an “employee” of the Defendant under the HRA. W. Va. § 5-11-3(e).
113. The Defendant has permitted a sexually discriminatory toxic work environment to exist at the training academy.
114. The Defendant created the conditions required that would permit any individual(s) to feel empowered enough to install and operate a hidden camera in the female shower and locker facilities for their own sexual gratification.
115. The Defendant violated the HRA when it, acting by and through its instructors, supervisors, agents, employees, and representatives, including Defendants Eldridge, Perry, and Lee, and perhaps others whose identities are not yet known, installed and operated the Recording Devices in the female shower and locker facilities at the training academy.
116. The Defendant discriminated against the Plaintiff on the basis of her sex by subjecting her to different terms, benefits, and conditions of her employment compared to her male counterparts.

117. Namely, the Defendant subjected the Plaintiff to the nonconsensual videotaping/recording of her by the Recording Devices in the shower and locker facilities of the training academy.

118. As a direct and proximate result of Defendant's actions and/or inactions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity and shame, economic damages, diminished earning capacity and future lost wages.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 7: INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS

PLAINTIFF V. DEFENDANTS WEST VIRGINIA STATE POLICE; ELDRIDGE;

PERRY; LEE; AND COMER

119. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

120. The Defendant West Virginia State Police, acting by and through its instructors, supervisors, agents, employees, and representatives, including Defendants Eldridge, Perry, and Lee, and perhaps others whose identities are not yet known, knew of the installation of the Recording Devices within the female shower and locker facilities and/or installed and operated the Recording Devices in the female locker and shower facilities at the training academy.

121. Defendant Eldridge, Defendant Perry, and Defendant Lee, and perhaps others whose identities are not yet known, knew of the installation of the Recording Devices within the female locker and shower facilities at the training academy.

122. Defendant Comer intentionally revealed the Plaintiff's personally identifiable information and information of a private sensitive nature in his anonymous letters from 2022 and 2023, the latter of which was revealed such to Plaintiff.

123. The Defendants' conduct was intentional.

124. The Defendants' conduct was so outrageous and intolerable in that it offends against all generally accepted standards of decency and morality.

125. The Plaintiff suffered severe emotional distress as a result of the Defendants' conduct.

126. As a direct and proximate result of Defendants' actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 8: NEGLIGENCE

PLAINTIFF V. WEST VIRGINIA STATE POLICE

127. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

128. The Defendant West Virginia State Police, acting by and through its instructors, supervisors, agents, employees, and representatives, including Defendants Eldridge;

Perry; Lee; and Comer, and perhaps others whose identities are not yet known, was negligent in permitting the Recording Devices to be installed and operated by its such instructors, supervisors, agents, employees, and representatives in the female shower and locker facilities at the training academy.

129. The Defendant negligently failed to detect, locate, or prevent the Recording Devices from being installed or operated in the female shower and locker facilities at the training academy.

130. The Defendant negligently failed to warn of, remove, or remediate the Recording Devices from being installed or operated in the female shower and locker facilities at the training academy.

131. The Defendant negligently failed to conduct an investigation the Recording Devices and expose the identities of the individual(s) behind its installation and operation and/or who knew of the installation of the Recording Devices.

132. As a direct and proximate result of Defendant's actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 9: NEGLIGENT HIRING

PLAINTIFF V. WEST VIRGINIA STATE POLICE

133. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

134. The Defendant West Virginia State Police neglected to conduct a reasonable pre-employment investigation into the individual(s) who installed and operated the Recording Devices in the female locker and shower facilities at the training academy, and/or who knew of the placement of the Recording Devices, at the time such were placed and/or in operation, that would have made the Defendant aware that the individual(s) were sexual deviants and were inclined to engage in and/or sit by and do nothing as others engaged in activities such as the installation and operation of the Recording Devices within the female shower and locker facilities at the training academy.

135. In the alternative, if the Defendant did conduct a pre-employment investigation into the individual(s) who installed and operated the Recording Devices in the female locker and shower facilities at the training academy, and/or who knew of the placement of the Recording Devices, at the time such were placed and/or in operation, then the Defendant would have and/or should have known that the individual(s) were unfit to serve as employees of the Defendant.

136. As a direct and proximate result of Defendant's actions and/or inactions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 10: NEGLIGENT SUPERVISION

PLAINTIFF V. WEST VIRGINIA STATE POLICE

137. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

138. The Defendant West Virginia State Police negligently failed to monitor and supervise its employees and agents.

139. The Defendant negligently failed to learn and detect that its instructors, employees, agents, servants, and representatives, including Defendants Eldridge, Perry, Lee, and Comer, and perhaps others whose identity is not yet known, installed and were operating the Recording Devices in the female locker and shower facilities at the training academy and/or had knowledge of such.

140. The Defendant negligently failed to monitor its instructors, employees, agents, servants, and representatives and failed to secure its own facilities from individuals who would install and operate the Recording Devices in the female locker and shower facilities at the training academy.

141. As a direct and proximate result of Defendant's actions and/or inactions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 11: NEGLIGENT RETENTION

PLAINTIFF V. WEST VIRGINIA STATE POLICE

142. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

143. After the Defendant West Virginia State Police knew or should have known that the Recording Devices were installed and operated in the female locker and shower facilities at the training academy, it negligently retained the individual(s) responsible for its installation and operation and/or who had knowledge of such as of the time of such installation and operation.

144. The Defendant negligently retained instructors, employees, agents, servants, and representatives that installed and operated the Recording Devices in the female locker and shower facilities at the training academy and/or who knew of the installation and operation of the Recording Devices at the time of installation and/or operation, after it knew or should have known about the Recording Devices and the identities of individual(s) responsible for the installation and operation of the Recording Devices and/or those who knew of the installation and/or operation of such at the time of installation and/or operation.

145. As a direct and proximate result of Defendant's actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 12: NEGLIGENT DISCIPLINE

PLAINTIFF V. WEST VIRGINIA STATE POLICE

146. Plaintiff incorporated all previous statements and allegations above as if fully stated herein.

147. After the Defendant West Virginia State Police knew or should have known that the Recording Devices were installed and operated in the female locker and shower facilities at the training academy, it negligently failed to discipline the individual(s) responsible for its installation and operation and/or those who knew of the installation and/or operation of the Recording Devices at the time of the installation and/or operation of such.

148. The Defendant negligently failed to discipline instructors, employees, agents, servants, and representatives that installed and operated the Recording Devices in the female locker and shower facilities at the training academy, and/or those who knew of the installation and/or operation of the Recording Devices at the time of the installation and/or operation of such, after it knew or should have known about the Recording Devices and the identities of the aforescribed individual(s).

149. As a direct and proximate result of Defendant's actions and/or inactions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 13: NEGLIGENCE *PER SE*

PLAINTIFF V. WEST VIRGINIA STATE POLICE

150. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

151. A defendant who violates a statute or regulation without an excuse is automatically considered to have breached the duty of care and is therefore negligent as a matter of law.

152. The Defendant West Virginia State Police violated statutes including, but not to be limited to, the following:

- a. W.Va. Code § 21-3-20;
- b. W.Va. Code § 61-8-28; and
- c. W.Va. Code § 61-8-28a.

153. Defendant West Virginia State Police is therefore negligent *per se*.

154. As a direct and proximate result of Defendant's actions and/or inactions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 14: PREMISES LIABILITY

PLAINTIFF V. WEST VIRGINIA STATE POLICE

155. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

156. The Plaintiff entered upon the Defendant West Virginia State Police's premises.
157. The Plaintiff was lawfully entitled to be on the Defendant's land.
158. The Plaintiff was entitled to utilize the Defendant's female locker and shower facilities on its premises.
159. There existed unreasonably dangerous conditions on the Defendant's premises.
160. The unreasonably dangerous conditions included sexual deviant employees and agents of the Defendant and the Recording Devices in the female locker and shower facilities at the training academy.
161. The Defendant knew or should have known about the unreasonably dangerous conditions on its land.
162. The Defendant failed to warn of the unreasonably dangerous conditions on its land and failed to remediate the unreasonably dangerous conditions on its land.
163. As a direct and proximate result of Defendant's actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 15: INTENTIONAL SPOILATION OF EVIDENCE

PLAINTIFF V. WEST VIRGINIA STATE POLICE, ELDRIDGE, PERRY, AND LEE

164. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

165. The Defendants knew that the Recording Devices were installed and operated in the female locker and shower facilities at the training academy.
166. The Defendants knew that the Recording Devices captured images and videos of women in the female locker and shower facilities at the training academy.
167. The Defendants knew that the images and videos were stored on memory devices, including thumb drives and hard drives.
168. The Defendants knowingly, wantonly, and intentionally, destroyed the evidence of the Recording Devices, the memory devices, and the actual images and recordings captured by the Recording Devices.
169. The evidence destroyed by the Defendants was of vital importance to the Plaintiff's causes of action in this civil action.
170. But for the Defendants' intentional spoliation of evidence, the Plaintiff will likely never know with certainty whether the recordings of her in the female shower and locker facilities in a state of nudity still exist, who has those recordings, who has viewed those recordings, and whether they will ever be released to the public and/or posted online.
171. Furthermore, the Defendants attempted to fraudulently conceal their wrongdoing by destroying evidence of their wrongdoing and by lying to and misleading witness Jon Doe, and in turn, Plaintiff, about the scope of their knowledge of and/or participation in said wrongdoing.
172. As a direct and proximate result of Defendants' actions and/or inactions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 16: VIOLATION OF THE WEST VIRGINIA CONSTITUTION,

ARTICLE 10, DUE PROCESS CLAUSE

PLAINTIFF V. WEST VIRGINIA STATE POLICE, ELDRIDGE, PERRY, AND LEE

173. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

174. Article III, Section 10 of the West Virginia Constitution provides that “[n]o person shall be deprived of life, liberty, or property, without due process of law, and the judgment of his peers.”

175. The Defendant West Virginia State Police, Defendant Eldridge, Defendant Perry, and Defendant Lee, and perhaps others whose identities are not yet known, have denied the Plaintiff’s liberty, in the form of her rights as a woman to be able to use the female locker and shower facilities at the training academy without being monitored, surveilled, and/or videotaped without her knowledge or consent.

176. The Defendants have denied the Plaintiff’s liberty without affording her rights, as demanded by the West Virginia Constitution.

177. As a direct and proximate result of Defendants’ actions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity and shame, economic damages, diminished earning capacity and future lost wages.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

COUNT 17: CIVIL CONSPIRACY

PLAINTIFF V. WEST VIRGINIA STATE POLICE, ELDRIDGE, PERRY, AND LEE

178. Plaintiff incorporates all previous statements and allegations above as if fully stated herein.

179. The Defendant West Virginia State Police, acting by and through its instructors, supervisors, agents, employees, servants, and representatives, devised a plan to commit tortious conduct against the Plaintiff.

180. Defendant Eldridge, Defendant Perry, and Defendant Lee, and perhaps others whose identities are not yet known, by their participation in the installation and operation of the Recording Devices, and/or their knowledge of such during the installation and/or operation of such, conspired to install and operate the Recording Devices in the locker and shower facilities at the training academy.

181. Multiple instructors, supervisors, agents, employees, servants, and representatives of the Defendant West Virginia State Police conspired to conceal its wrongdoing, destroy evidence, protect the individual(s) responsible for the installation and operation of the Recording Devices, and/or those with knowledge of the installation and/or operation of such at the time of the installation and/or operation of such, and do deny the Plaintiff her rights as a woman to be able to use the female locker and shower facilities at the training academy without being videotaped, monitored, and surveilled without her knowledge or consent.

182. As a direct and proximate result of Defendants' actions and/or inactions, the Plaintiff has suffered personal injuries and damages, including but not limited to mental

suffering and mental anguish, past and future lost enjoyment of life, past and future humiliation, embarrassment, indignity, and shame.

WHEREFORE, Plaintiff prays for relief as set forth herein below.

PRAYER FOR DAMAGES

WHEREFORE, Plaintiff respectfully request a judgment in her favor and against the Defendants and prays for all available damages and remedies available at law and equity, including monetary damages in amount to be determined at trial, together with interest, costs and fees, including attorneys' fees. The Plaintiff also respectfully requests punitive damages with respect to Defendants Joshua Eldridge, Robert Perry, James Lee, and Joseph Comer. Finally, the Plaintiff also respectfully requests any further relief deemed just and proper.

PLAINTIFF DEMANDS A JURY TRIAL ON ALL COUNTS.

**JANE DOE NO. 1
BY COUNSEL**



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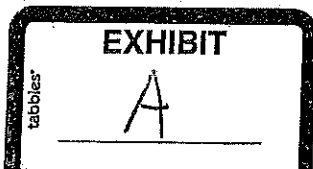
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Senator Craig Blair
Senator Mike Caputo
Senator Laura Chapman
Senator Vince Deeds
Senator Glenn Jeffries
Senator Mark Hunt
Senator Mike Stuart
Senator Patricia Rucker
Senator Michael Woelfel
Delegate Roger Hanshaw
Delegate Moore Capito
Delegate Geoff Foster
Delegate Evan Hanson
Delegate Sean Hornbuckle
Delegate Mike Pushkin

Dear Senators, Delegates, and AG Morrisey,

The following information was previous mailed several months ago to the Office of the Governor of the State of West Virginia and the WV Office of Special Investigations.

As a result, the West Virginia Department of Homeland Security has conducted an investigation performed by Investigator James Stout. **This investigation has been completed and a report has been submitted to the Department of Homeland Security.** Additional information gathered is that the investigation confirmed the below information that was requested to be investigated and which resulted in discovery of criminal violations in addition to the ones outlined in this correspondence as well as violations of legislative rule 81 CSR that governs the WV State Police code of discipline.

I regret that I cannot sign this document due to knowing I will be retaliated against by the West Virginia State Police. In submitting this information, I am in hopes that this situation is thoroughly reviewed, and appropriate actions taken to promote the betterment of the West Virginia State Police and the public trust.



- In the end of 2018 early 2019 a Summers County Deputy in the basic class in 2018 observed a strange car at the gas pumps. Approached an encountered an intoxicated male and female. The male identified himself as Lt Col Bowles (now retired) and told the deputy to leave. The deputy returned to the academy and woke up Corporal James Mitchell (now promoted to First Sergeant) who was on duty. Corporal Mitchell walked outside of the academy and observed a silver car leaving the parking lot and driving up toward the Professional Development Center. Corporal Mitchell got in his cruiser and drove up to the PDC and saw Bowles in the PDC Dorms parking lot in a fight with a female identified as Debra Ray. Corporal Mitchell separated them and put them to bed. Corporal Mitchell notified Lt Colonel Vince Deeds (now retired). Lt Col Deeds approached Bowles the next day and Bowles instructed him to stay out of it. Lt Colonel Deeds then went to Colonel Jan Cahill and notified him of the incident, and Colonel Cahill instructed Deeds to stay out of it.
- In 2018, Academy Deputy Director Joseph Potaro, now deceased, constructed a hidden camera system and placed it inside the women's locker room inside the gymnasium at the State Police training facility. Potaro obtained a hidden camera from the State Police Bureau of Criminal Investigations Section and had the Academy purchase an external hard drive and utilized a series of D batteries as a power source to build the system. He claimed at the time, he was doing it to catch a marital affair between the Chief of Staff (Reginal Patterson) and [REDACTED] and was convinced they were performing coitus in the locker room. Academy staff was aware of the situation but was extremely fearful to come forward due to retaliation against them from Potaro and Lt Colonel Timothy Bradley. After Potaro died, Academy staff was cleaning out his staff room and discovered an external hard drive that contained hours of video footage wherein multiple females was recorded changing clothes. At the time of this writing, the only female positively identified was [REDACTED] and noted "female students and female Troopers". Academy staff contacted the Chief of Staff, Reginal Patterson, and gave him the evidence and notified him of the situation. Major Patterson communicated with Captain Shallon Olgesby, now promoted to Major and Chief of Staff, also a victim advocate and women's rights activist and ordered the evidence destroyed and no investigation conducted.
- May 04, 2022 Major Shallon Olgesby directed a mandatory meeting at the academy with academy staff. Participating was: Major James Findley (Director of Professional Standards, Captain Harold Petry (Director of Training), Deputy Director Kenneth Murry, F/Sgt Jay Powers, Sgt Charles Kuhn, Sgt Joshua Eldridge, Corporal Marlene Moore, Corporal George Burnem and Senior Trooper Matthew Lovejoy. The meeting was started by both Majors stating specifically that they were going to directly talk about a

specific members internal investigation, which is a violation of legislative rule. Major Olgesby revealed to the Academy staff the incident when Potaro was alive that he placed a hidden camera in the girls bathroom and recorded females dressing and undressing. Director of Professional Standards, Major James Findley, and Chief of Staff, Major Shallon Oglesby, in a meeting at the WVSP Academy did divulge to Academy staff (ten members of the State Police) that the hidden camera within the women's locker room of the Academy Training Facility DID exist and gave intimate knowledge of the device design and confirmed that it did record persons.

- The State Police utilizes a "ghost account" for purchasing. Classes and out of state travel specifically, and other unknown purchases, are paid from this account. After the payment, the department then submits the bills to purchasing for reimbursement. When a logistic officer attempted to obtain more information, Connie Gundy (head of purchasing) instructed this logistics officer to not ask questions above his pay grade and stated to just do it that they could not afford an audit
- Personal items are being purchased through "p card" because it does not have to be bid out and doesn't require justification. Truck toppers and various other items were purchased.
- Professional Development Dorms were purchased from Shawnee Hills and remodeled to be utilized to house Troopers and other agencies when they were taking classes at the Professional Development Center. The bottom floor was dedicated solely for "Senior Staff" which is appointed members by the Colonel and various other members approved by the Colonel. These rooms have since been remodeled where they were furnished with beds and refrigerators, couches and other luxury items. These rooms are being utilized by at least one member (Lieutenant Michael Anderson) to live in 5 days a week and being stocked with food and drinks from the academy. Food and drinks at the academy are paid by LETC grant and to be utilized for training classes.
- State Police received dedicated funding from the MVI fund to be utilized for the purchasing of vehicles and specific items for the same. State Police has utilized that money to purchase large expense items NOT for vehicles. The department has purchased Harley Davison's rumored to be from the fund. Body cameras and tasers. The department director of the program cannot access the department records to see where that money is spent.

- Body cameras and GPS trackers are being placed on troopers and in field trooper's cruiser but not being utilized by ranking members and specifically Senior Staff. These members perform the same duties as a field trooper when they work patrols and contract shifts. Senior Staff members do not follow department policies nor do they follow legislative ruling, as they are governing members under their command.
- Major Shallon Olgesby utilizes a grant, National Criminal History Improvement Program to pay herself extra overtime. Though she may contribute at times to the work outlined within the grant, there is documentation wherein she counted/claimed 17 hours in one day utilizing some of this grant money when she in fact was not working. There are social media pictures of her and the Director of Human Resources on a girl's trip in Fayette County when she claimed she was working for the state police.
- Lt Colonel Nelson utilizes state police vehicles to travel throughout the state to meet women for marital affairs. Specifically; he utilizes Troop 4's shop truck to further his marital affair and was caught by a member as he actively engaged in coitus inside the troop 4 shop after hours. It rumored he had a sexual harassment complaint filed against him and being investigated by the state police. To which Major James Findley (Director of Professional Standards) is in engaged in an affair with Major Shallon Olgesby (Chief of Staff) demonstrating a compromised and potentially biased judgement.
- 2019 or 2020 Sergeant Brian Hammontree was caught stealing overtime from the members under his command. Sergeant Joshua McCoy at the South Charleston Detachment discovered the fraudulent activity that Hammontree was doing. Corporal Patrick Jones and other members of the South Charleston Detachment were victims to Sergeant Hammontree. No investigation was conducted due to his friendship with Major James Findley and he was transferred to the WV Turnpike. While on the Turnpike, he made approximately \$144,000 dollars. Based on his gross income, in order to make that money he violated department policy and double dipped, counting hours for regular duty and contract pay. Major James Findley and Captain Greg Stalnaker also made in an excess of \$110,000 dollars. Senior Staff members are not governed or monitored. They are "exempt" which means they have to work 189 hours a month. They are not obligated to a specific schedule or obligated to calls for service. This allows them to manipulate their hours, even falsify, in order to work contracts and grants. Major Shallon Olgesby on just one incident, has counted 6 hours of DUI grant money and never even working the DUI checkpoint. Can be confirmed by CDDP Director and members at the checkpoint.

- December 16, 2022 an altercation occurred at WVSP HQ between retiring F/SGT Micheal Oglesby (husband of Major Oglesby) and Major James Findley, Director of Professional Standards, over the sexual relationship between of Maj. Findley and Major Oglesby. The incident was broken up by Col. Cahill.
- The department is garnishing the wages of F/Sgt Goldie against his will.
- The department is threatening to garnish the wages of Tiffany Huffman due to their claim of overpaying her \$13,000.00
- Major Shallon Oglesby has been involved in three crash incidents in her department vehicle that have not been subject a crash report being completed against policy and have not been documented officially. There are repair records for replacement parts ect. The department continues to suspend troopers for department crashes.
- A current member is in a grievance process. Captain Roy Moss, the director of Legal Services stated to the member's attorney that Major Findley during a hearing had misspoke (lied) stating " he made a mistake in testimony. There is no oversight for State Police Administrators."

Major Findley and Major Oglesby have alleged to have been caught in sexual conduct at WVSP HQ by department custodians.

Sexual assault complaints by five women alleged to have been perpetrated by a WVSP supervisor in Mingo County, Williamson Detachment should be investigated.

Respectfully Submitted,