

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ARKANSAS
ELEVENTH JUDICIAL CIRCUIT - WEST

ELECTRONICALLY FILED
Jefferson County Circuit Court
Flora Cook-Bishop, Circuit Clerk
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35CV-26-477
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CELINA COLEMAN-HALE

PLAINTIFF

v.

JEFFERSON COUNTY, ARKANSAS

LAFAYETTE WOODS, JR., in his official capacity as Sheriff of Jefferson County

DEFENDANTS

COMPLAINT FOR VIOLATION OF THE ARKANSAS FREEDOM OF INFORMATION ACT

Plaintiff, **Celina Coleman-Hale**, for her Complaint against Defendants, states:

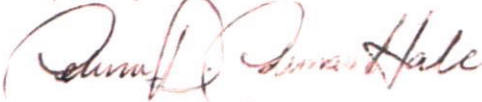
1. Plaintiff Celina Coleman-Hale is a citizen of the State of Arkansas and resident of Arkansas.
2. Defendant **Jefferson County, Arkansas** is a political subdivision of the State of Arkansas and operates public offices subject to the Arkansas Freedom of Information Act ("FOIA"), Ark. Code Ann. § 25-19-101 et seq.
3. Defendant **Lafayette Woods, Jr.** is the duly elected Sheriff of Jefferson County, Arkansas, and is sued in his official capacity as custodian of records and head of the Jefferson County Sheriff's Office, including the W.C. "Dub" Brassell Adult Detention Center.
4. This action arises under the Arkansas Freedom of Information Act, Ark. Code Ann. § 25-19-101 et seq.
5. Jurisdiction and venue are proper in this Court pursuant to Ark. Code Ann. § 25-19-107, which authorizes citizens denied rights under FOIA to seek judicial enforcement in circuit court.
6. Plaintiff submitted a lawful request for public records pursuant to the Arkansas Freedom of Information Act to the Jefferson County Sheriff's Office and/or W.C. "Dub" Brassell Adult Detention Center ("DBDC").
7. The request sought records relating to the operations, policies, logs, grievances, reports, and related documentation of DBDC covering specified time periods.
8. Defendants acknowledged receipt of Plaintiff's FOIA request.
9. Defendants further acknowledged the existence of responsive records.
10. Defendants expressly represented in written communications that records were being gathered, reviewed, scanned, and/or prepared for production.

11. In written correspondence, Defendants admitted that responsive records exist, including but not limited to:
 - a. Policy manuals and/or standard operating procedures
 - b. Grievance records
 - c. Incident records
 - d. Maintenance and work order records
 - e. Other detention related records
12. Defendants further admitted that records required redaction prior to release.
13. Defendants provided partial production of certain records.
14. Defendants repeatedly represented that additional records would be produced at later dates.
15. Despite acknowledging the existence of responsive records, Defendants failed to produce the requested records within the timeframes contemplated by FOIA.
16. Defendants repeatedly delayed production, citing internal review, scanning, redaction, staffing, or logistical issues.
17. Arkansas FOIA does not authorize indefinite delay based on administrative convenience, workload, or internal processing preferences.
18. Significant time has elapsed since Plaintiff's request and Defendants' acknowledgments.
19. Defendants have not yet provided full production of the requested records.
20. Defendants have failed and/or refused to produce entire categories of requested records.
21. Defendants have not provided lawful, specific statutory exemptions justifying withholding of such records.
22. FOIA requires disclosure of non exempt public records and requires agencies to identify specific exemptions when withholding records.
23. Silence, delay, or generalized statements do not satisfy FOIA obligations.

24. Defendants' conduct constitutes violations of the Arkansas Freedom of Information Act, including but not limited to:
 - a. Failure to provide timely access to public records
 - b. Failure to produce acknowledged responsive records
 - c. Unlawful delay of production
 - d. Withholding of records without statutory justification
25. Plaintiff has made repeated good faith efforts to obtain compliance without court intervention.
26. Defendants' noncompliance necessitates judicial enforcement.
27. As of 4/2/2026, at 10:52AM CST, Defendants failed to respond to this notice of receipt of a spreadsheet and have made no further effort to produce the requested records.
28. Defendants' silence and continued failure to produce records constitutes ongoing and willful noncompliance with the Arkansas Freedom of Information Act.

WHEREFORE, Plaintiff **Celina Coleman-Hale** respectfully requests that this Court declare that Defendants have violated the Arkansas Freedom of Information Act, order Defendants to immediately produce all non exempt public records responsive to Plaintiff's FOIA request, order Defendants to identify any withheld records with specific statutory exemption citations as required by law, award Plaintiff reasonable costs and any relief authorized under Ark. Code Ann. § 25-19-107, and grant all other relief to which Plaintiff may be entitled.

Respectfully Submitted,



Celina Coleman-Hale
Plaintiff, Pro Se

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STATE OF ARKANSAS
COUNTY OF Washington

Subscribed and sworn to before me, a Notary Public, on this 2nd day of April, 2026,
by Celina Coleman-Hale.

Kathie Fischer
Notary Public

My Commission Expires: April 18, 2029

