

**CIRCUIT COURT FOR HAMILTON COUNTY**  
**State of Tennessee**

PATRICIA ANN SCHREANE, §  
In her individual capacity, §

CLARENCE SCHREANE, §

C'SHAWN SCHREANE, §  
An 8 year old minor child through §  
his guardian and next friend §  
Patricia Ann Schreane, and §

N'ASIA SCHREANE, §  
A 6 year old minor child through §  
her guardian and next friend §  
Patricia Ann Schreane, §

*Plaintiffs,* §

~v~ §

CARLOS K. JONES, §  
In his individual capacity §  
and his capacity as an agent §  
and representative of Platinum §  
Bonding, LLC, §

JOHN DOE ONE, §  
In his individual capacity §  
and his capacity as an agent §  
and representative of Platinum §  
Bonding, LLC, §

JOHN DOE TWO, §  
In his individual capacity §  
and his capacity as an agent §  
and representative of Platinum §  
Bonding, LLC, and §

PLATINUM BONDING, LLC, §

*Defendants.* §

No. \_\_\_\_\_

**COMPLAINT**

**Introduction:**

1. This is an action to seek money damages and redress the malicious torts and negligence of the defendants in violation of Tennessee statutory and common law.

**Jurisdiction & Venue:**

2. This Court is vested with original jurisdiction over the state claims pursuant to TENN. CODE ANN. § 16-10-101, et seq.

3. Venue is proper in this Court pursuant to TENN. CODE ANN. § 20-4-102. All acts complained of occurred within Hamilton County, Tennessee.

**The Parties:**

4. At all times relevant to this action, Plaintiffs Patricia Ann Schreane (“Patricia”), Clarence Schreane (“Clarence”), C’Shawn Schreane (“C’Shawn”), and N’Asia Schreane (“N’Asia”), were residents of Hamilton County, Tennessee.

5. At all times relevant to this action, C’Shawn and N’Asia were minor children in the legal guardianship of Patricia. C’Shawn and N’Asia sue the defendants through Patricia as their guardian and next friend.

6. At all times relevant to this action, Defendant Carlos K. Jones (“Jones”) was a resident of Hamilton County, Tennessee. Plaintiffs sue Jones in his personal capacity and in his capacity as an agent for Defendant Platinum Bonding, LLC.

7. Plaintiffs believe that, at all times relevant to this action, Defendants John Doe One (“Doe 1”), and John Doe Two (“Doe 2”) were residents of Hamilton County, Tennessee. Plaintiffs sue these defendants in their personal capacities and in their capacities as agents for Defendant Platinum Bonding, LLC.

8. At all times relevant to this action, Defendant Platinum Bonding, LLC, (“Platinum”) was a corporation listed with the Tennessee of State as a corporation in the business of bail bonding and is regulated by the State of Tennessee and subject to the provisions of Tenn. Code Ann. § 40-11-101, *et seq.*

9. Platinum operates within Hamilton County, Tennessee, was listed with the Hamilton County Clerk of Criminal Court as an approved bail bonding company, and was once known as Carlos Bail Bonding.

10. Platinum’s registered agent with the Tennessee Secretary of State is R. Wayne Peters, at 320 McCallie Avenue, Chattanooga, Tennessee, 37402.

11. Plaintiffs sue Platinum in its individual capacity as a corporate entity and “person.”

**Factual Basis:**

12. In the early morning hours of April 9, 2013, plaintiffs were home at 2161 Shepherd Road, Chattanooga, Tn when defendants Jones, and Does 1 and 2 arrived in two SUVs with blues lights activated. These three defendants wore clothing, such as body armor, that made them each look like police officers.

13. Jones and Does 1 and 2 knocked on the front door and claimed they were police.

14. Patricia approached the front door and heard one of the defendants say to the effect, “this is the police, open up or we will kick in the door.”

15. Patricia began to open the front door, and the three individual defendants forced their way inside and, at gunpoint, ordered Patricia to put her hands up.

16. The three individual defendants pointed firearms at Patricia, and they also shined flashlights upon her.

17. C'Shawn was present and next to Patricia when the three individual defendants acted as set forth in ¶¶ 14-16.

18. The three individual defendants also pointed their firearms at the 8 year old C'Shawn and told him to put his hands up.

19. One of the Doe defendants pulled C'Shawn from inside the residence and placed him face-down onto the front porch.

20. Jones ordered Patricia and Clarence from inside the residence at gunpoint and placed them face-down onto the front porch. Doe 1 searched Clarence.

21. Two guests of plaintiffs, "Charlie" and Theodore Pinkerton had left the residence a few minutes before the events described in ¶¶ 12-20.

22. The three individual defendants had these two guests handcuffed and on the front porch.

23. Jones searched the entire interior of the plaintiff's residence, calling out for a person. Jones never found the person.

24. At all times during the events stated herein, Clarence and Patricia demanded Jones to produce a warrant.

25. Jones replied one of the Does had the warrant.

26. One of the Does held up a piece of paper and said to the effect, "here's the warrant."

27. Clarence demanded of the three individual defendants to produce police identification.

28. When the three individual defendants failed to produce police identification, Clarence got onto his feet, told them to leave and that he was calling police.

29. The three individual defendants departed in their SUVs in a “hurry,” “peeling out.”

30. At all times relevant to this matter, the three individual defendants verbally abused the plaintiffs, including the children, and used physical force, the threat of physical force, and firearms against the unarmed and non-resistive plaintiffs.

31. At all times relevant to this matter, the three individual defendants operated illegally and without probable cause to take the actions in the manner set forth herein.

32. At all times relevant to this matter, the three individual defendants acted as agents for Platinum and operated within the scope and course of their agencies for Platinum.

33. No reasonable bondsman would have acted in such a manner.

34. As a direct and proximate cause of the acts and omissions of the defendants, all plaintiffs suffered great fear, humiliation, mental anguish, physical harm, denial of their personal freedoms, denial of the use and enjoyment of their home, and the violation of their civil rights guaranteed under Tennessee law.

**Causes of action:**

35. The acts and omissions of the defendants constitute violations of the following laws of the State of Tennessee, and thus the following causes of action:

- a. Assault.
- b. Battery.
- c. Intentional infliction of emotional distress.
- d. Tort of outrage.
- e. False imprisonment.
- f. Defamation.

- g. Trespass to realty.
- h. Negligence *per se* from acts and omissions that constitute multiple felonies including, but not limited to aggravated assault, aggravated burglary, aggravated child abuse, and aggravated kidnapping.
- i. Negligence.
- j. Malicious Harassment, TENN. CODE ANN. § 4-21-701.

**WHEREFORE**, having plead their causes of action, plaintiffs seek the following relief against the defendants both joint and several:

- 1. Actual damages in the amount of four hundred thousand dollars (\$400,000.00).
- 2. Punitive damages in the amount of four hundred thousand dollars (\$400,000.00).
- 3. Damages and attorney fees as allowed under TENN. CODE ANN. § 4-21-701.
- 4. A jury trial.
- 5. Tax costs of this action against the defendants.
- 6. All other relief allowed by equity.

Respectfully submitted,

By: \_\_\_\_\_

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