

6. Defendant Ben Adams ("Adams") was at all times relevant to this Complaint a deputy with the Catahoula Parish Sheriff Office. In his capacity as a deputy for Catahoula Parish, Defendant Adams had a legal obligation to act in conformity with the United States and the Louisiana Constitutions and other applicable federal and state laws. Defendant Adams is sued in his official capacity and in his individual capacity. At all times relevant to this Complaint Deputy Adams was acting within the scope and course of his employment with Catahoula Parish Sheriff Office under the direction of Defendant Edwards. At all times relevant to this Complaint, Deputy Adams was also acting under color of the laws of the United States and the State of Louisiana.

FACTUAL ALLEGATIONS

7. Myles McMillin ("McMillin") was born in Jonesville, Louisiana but has lived in Harrisonburg Louisiana since 1999.

8. McMillin is Sixty-two years old.

9. McMillin resides in Harrisonburg with his teen age son. His wife died in 2020

10. McMillin works as surveillance supervisor for the Jena Choctaw tribal casino

10. Like many, McMillin created a Facebook account to help him keep in touch with old friends, classmates and colleagues, and to participate in civic life in his local area.

12. McMillin initially created his Facebook account/profile back in 2009.

13. McMillin has always thought of himself as someone who supports law enforcement and the difficult service they perform.

14. On March 1, 2024, McMillin received a Facebook message from a Facebook friend that concerned Sheriff Toney Edwards and his act of allegedly sending a minor sexually explicit photos of himself by text message on a cell phone.

15. McMillin then made a post on Facebook on March 1, 2024, that read as follows:

"Have ya heard the word on the street Catahoula Parish? Word is a 16yr old minor in Concordia Parish had her phone confiscated and it has supposedly been turned over to the Attorney General. Someone of interest is supposed to be in that phone too, and has been missing in action the last few days. Dic Pics, text messages. Whatcha think?"

16. McMillin made a second post on Facebook on March 2, 2024, that read as follows:

Don't you think for a minute I'm NOT gonna wear this out! All you Flying Monkeys have known it for decades. How many years I been telling you???



17. McMillin made a second post on Facebook on March 2, 2024, that read as follows:

Zip-a-dee-doo-dah, zip-a-dee-ay. My, oh, my what a wonderful day.... I saved this one for a long time. YEARS!



18. McMillin made a third post on Facebook on March 2, 2024, with a meme video attached that read as follows:

I'm no troublemaker. I've never been a liar. All I've ever done has been a champion of exposing the truth that none of YOU have ever had the balls to even acknowledge.

19. McMillin made a post on Facebook on March 3, 2024, that read as follows:

I know you and your flying monkeys are gonna be scouring my page, imagine Denise's soul right now, smiling. One of her demons has finally been exposed to light! God does work in mysterious ways.

20. McMillin made a second post on Facebook on March 3, 2024, that read as follows:

Well the latest word on the street in reference to Catahoula's SnapChatHero is that he's supposed turn himself in tomorrow. Since he was awarded the leniency of not being immediately cuffed and stuffed in a patrol car like you would have, I'm sure he's had ample time to clean all his electronic devices in preparation. Flying Monkeys shouldn't fret, they won't throw him in for an overnight sleepover with Bubba either.

**WHEN YOU EXPOSE A DEGENERATE FOR
EXACTLY WHAT THEY ARE, DON'T EXPECT
ANY APOLOGIES FROM THE PEOPLE WHO
BOUGHT INTO THEIR RATIONALIZATIONS
AND SOCIALIZED THEIR BAD BEHAVIOR.**

**THEY KNOW WHAT THEY'VE GOT, ITS JUST
HARD TO ACKNOWLEDGE THEIR OWN
RESPONSIBILITY FOR CONDONING THEM.**

SNAPCHATHEROES

21. McMillin made a third on Facebook on March 3, 2024, that read as follows:

You never really know do ya? Especially when it comes to Catahoula Parish because the circus left a long time ago, but the shows have never ended. I dunno, I'm so far disconnected from what's going on around here now thankfully, that I'm like spotting a shadow in the night!

So, if they're right, and they REALLY did corner up the ole Snapper..... you're supposed to find out today!!!

Welcome back my friends, to the show that never ends. We're so glad you could attend, Come inside! Come inside!



22. As a result of these post identified in factual allegation numbers 17 to 23 above, Defendant Adams prepared and swore out an arrest affidavit for the arrest of McMillin for cyberstalking sheriff Toney Edwards.

23. Defendant Adams presented this sworn affidavit to Judge John C Reeves on March 4, 2024 and Judge Reeves issued a warrant for a felony arrest of Myles McMillin for cyberstalking the sheriff of Catahoula Parish, an elected official.

24. Defendant Adams stated on March 4, 2024, in his sworn affidavit that:

On March 4, 2024, CPSO detectives began investigating multiple counts of cyberstalking, after receiving information regarding a subject identified as Myles Milan McMillin, who recently made a public post by way of social media, accusing sheriff Toney Edwards of being a pedophile. In the most recent post, which has been deleted, McMillian publicly stated that Edwards was being investigated by the Concordia Parish Sheriff Office, after he transmitted sexually explicit photos to a 16-year-old minor. The post then went "Viral", with McMillin further commenting that Edwards had been pulled out of a Sheriff's Association meeting and informed that he was under investigation. Both Sheriff Edwards and Sheriff David Hedrick, of