

2025 DEC 12 AM 10:24

IN THE CIRCUIT COURT OF SALINE COUNTY, ARKANSAS  
CIVIL DIVISION

BY: 

SHANNA HASTINGS

PLAINTIFF

V.

CASE NO. 63CV-25- 2559 - 3

CITY OF BRYANT, ARKANSAS;

MAYOR CHRIST TREAT,

In his Official Capacity and Individual Capacity; and

CHIEF CARL MINDEN,

in his Official Capacity and Individual Capacity

DEFENDANTS

COMPLAINT

**Parties, Jurisdiction, and Venue**

1. Plaintiff, SHANNA HASTINGS, is a resident and citizen of Saline County, Arkansas. At all times relevant, Plaintiff was employed by the City of Bryant Police Department as a Detective. Plaintiff's job duties were to investigate criminal cases as they were assigned to her.
2. Defendant, CITY OF BRYANT POLICE DEPARTMENT ("BPD" or "the Department"), is a municipal police department located in Saline County, Arkansas, and an instrumentality of the CITY OF BRYANT, a municipal corporation created under the laws of the State of Arkansas and is a "public employer" within the meaning of Ark. Code Ann. § 21-1-602(5).
3. Defendant, CARL MINDEN, is the Chief of Police for the City of Bryant Police Department and is sued in both his official capacity and individual capacity. At all times relevant hereto, Chief Minden was a policymaker for the City of Bryant regarding law enforcement operations, personnel, and disciplinary matters.

4. Defendant, CHRIS TREAT, is the Mayor of the City of Bryant and is sued in both his official capacity and his individual capacity. At all times relevant hereto, Mayor Treat was the final policymaker for employment actions for the City of Bryant and the City of Bryant Police Department.
5. Jurisdiction is proper in this Court pursuant to Ark. Code Ann. § 21-1-601 et seq. (Arkansas Whistle-Blower Act) and the Arkansas Constitution, Article 2, §§ 4, 6, and 8.
6. Venue is proper in Saline County under Ark. Code Ann. § 16-60-101 because the events giving rise to this action occurred in this county and the Defendants are located here.
7. Defendant CITY OF BRYANT is not entitled to sovereign immunity under Article 5, § 20 of the Arkansas Constitution. Sovereign immunity extends only to the State and its agencies, not to municipalities or their departments.
8. This Court has subject matter jurisdiction under the Arkansas Constitution, the Arkansas Whistle-Blower Act, and Arkansas common law. Venue is proper in Saline County pursuant to Ark. Code Ann. § 16-60-101 and § 21-1-604(b).

### **Factual Background**

#### **A. Background**

9. Plaintiff Shanna Hastings is a decorated and respected CLEST-certified law enforcement officer with over a decade of public safety experience. She joined the Bryant Police Department (BPD) in March 27, 2023, quickly advancing to the Criminal Investigations Division, where she earned a reputation for professionalism, thoroughness, community engagement, and unwavering integrity.

10. In the months leading to her termination, Plaintiff engaged in activities protected under the Arkansas Whistle-Blower Act (A.C.A. § 21-1-601 et seq.) and Arkansas constitutional free speech protections.
11. In the course of her duties, Plaintiff raised concerns internally about suspected misconduct, possible corruption, and possible unlawful activity within the Department.

**B. Protected Disclosures and Internal Reporting**

12. On or about June 21, 2025, Captain Nate Johnston reportedly rode motorcycles with known Bandidos Outlaw Motorcycle Gang members to Eureka Springs and showed photos of this association to Saline County Sheriff's Office Lt. Matt Wooten.
13. On or about June 28, 2025, Bryant PD responded to a disturbance at a local establishment known to law enforcement to host outlaw motorcycle gang affiliates. Three Bandidos members were leaving, one with visible blood on his clothing. Patrol officers requested a gang enhancement for the case.<sup>1</sup>
14. On or about June 30, 2025, this case was assigned to Plaintiff to investigate due to it involving at least one felony criminal offense.
15. On or about July 2, 2025, Plaintiff, as part of her investigation, accompanied an Alcoholic Beverage Control (ABC) inspection of the Establishment after receiving information about a concealed back room and gang presence. Prior to the visit, Plaintiff consulted with Lt. Scottie Courtney and CHIEF CARL MINDEN, who approved her participation.

---

<sup>1</sup> The identity of the business has been withheld to avoid compromising any ongoing investigations or reputational interests of non-party entities. Plaintiff reserves the right to supplement or amend upon court order or further factual development.

16. During the inspection, Plaintiff observed Captain Nathan Johnston of the Bryant Police Department arrive at the Establishment in plain clothes alongside the Establishment owner's adult son. Johnston sat at the bar with an observable shift in demeanor—remaining silent and not engaging with Plaintiff or the officers conducting the inspection.
17. At one point, officers discovered a concealed interior room. When an employee attempted to access the room, the owner's son directed her not to open it. As this exchange occurred, Captain Johnston stood up from the bar, began texting on his phone, then abruptly exited the Establishment, entered his vehicle, and left the scene—leaving behind the individual he had arrived with.
18. Plaintiff found Johnston's behavior highly unusual and concerning, particularly given prior incidents at the same location and the known gang affiliations under investigation. She suspected that Johnston may have been communicating with individuals associated with the Establishment in real time during the inspection.
19. Plaintiff immediately contacted her direct supervisor, Lt. Scottie Courtney, via cell phone to report Captain Johnston's behavior. Lt. Courtney was a supervisor in Plaintiff's chain of command. Before Plaintiff left the Police Station to conduct her investigation at the business, Chief Minden requested that once Plaintiff returned to the Police Station that she come to his office to explain what had occurred. Upon returning and before the meeting, Chief Minden asked Public Information Officer Todd Crowson to sit in on the meeting due to the matter involving suspected activity by the Bandidos. Others present included Captain Jenceson Payte, Lt. Scottie Courtney, and Detective Nate Morrison.
20. At that time, Plaintiff requested that a formal complaint or investigation be initiated regarding Johnston's conduct and Chief Minden stated "that's not how it works." Shortly

thereafter, two of Plaintiff's direct supervisors, lectured Plaintiff for speaking with the Chief and implied that her concerns reflected a lack of trust in her chain of command. As Plaintiff was being lectured by Captain Pate, he directed Plaintiff to not speak about this to anyone not directly involved.

21. On or about July 4, 2025, Sgt. Nick Dean informed Plaintiff that Chief Minden wanted Sgt. Dean to speak with her to figure out what concerns she had. Plaintiff was advised that this meeting was considered an "inquiry," not an investigation, despite Plaintiff reiterating her serious concerns about improper conduct. Plaintiff expressed her concerns with what she had observed and explained that other officers had expressed similar concerns when Captain Johnston had showed up on the scene of calls at that location. Once such incident occurred in January 2024, when officers were questioning witnesses to get information for a call and Captain Johnston showed up on scene and told the citizens being questioned to "shut the fuck up and don't say another word."
22. On or about July 9, 2025, Plaintiff met with Prosecuting Attorney Chris Walton, a routine interaction in case preparation. Plaintiff scheduled this meeting on July 1, 2025, to discuss a gang enhancement in the case. When discussing the case with Walton, Plaintiff mentioned that a review of the file would show that Captain Johnston was on scene while off duty due to him being captured by the body worn camera. Walton asked if she had concerns about Johnston's conduct and whether the Chief was aware. Plaintiff confirmed the Chief had been informed.
23. On or about July 10, 2025, Sgt. Dean conducted follow-up interviews, questioning Plaintiff about her reports to Prosecutor Walton. Sgt. Dean told Plaintiff that Assistant Chief Plouch wanted Sgt. Dean to ask Plaintiff whether Bandidos affiliation was illegal. Plaintiff

confirmed their federal recognition as a criminal enterprise. Plaintiff was informed Chief Minden had discussed the matter with Prosecutor Walton. This interview was recorded.

24. On or about July 15, 2025, Plaintiff was subjected to a now designated formal investigation and recorded interview. This was the first time Sgt. Dean told her that his was an investigation. Plaintiff was told not to speak about this with anyone outside the chain of command and was questioned on pretextual grounds, including alleged incomplete case file submissions and her conversations with the prosecutor. Sgt. Dean advised Plaintiff that he had asked Captain Johnston about the incident and Captain Johnston indicated that he believed Plaintiff was doing this over a disagreement or argument Plaintiff and Captain Johnston had had via email. At this point, Plaintiff stated that based on the direction this is going, it feels retaliatory.
25. Despite being the complainant who reported potential misconduct within the department, Plaintiff was forced to defend her actions and respond to accusations unrelated to her concerns. She was not given a Garrity warning and was unaware that there were allegations against her or that she was under investigation.
26. On or about July 15, 2025, Plaintiff texted Lt. Courtney, expressing concern that the investigation was retaliatory. Plaintiff expressed concern about coming back to work and Lt. Courtney allowed Plaintiff to take the day off.
27. On or about July 18, 2025, Plaintiff was informed by Sgt. Dean about a scheduled Monday meeting with Chief Minden. However, when Plaintiff messaged Chief Minden to inquire about preparation for the meeting, Chief Minden declined to discuss the matter, stating that pre-meeting discussion would be inappropriate.

### **C. Termination and Retaliation**

28. On or about July 21, 2025, Plaintiff was terminated from her employment. The termination letter, signed by Mayor Chris Treat, cited violations of Standards of Conduct §§16 (Insubordination) and 17 (Failure to follow rules, policies, procedures, practices, and traditions.)
29. Plaintiff's conversation with the Prosecutor—a routine practice in CID case work—was cited as a basis for her termination
30. After the meeting in which Plaintiff was terminated, Chief Minden informed Plaintiff that he would "have to check the decertification box" on her on her CLEST paperwork, indicating a referral for decertification—a severe stigmatizing action typically reserved for officers found to have committed criminal or ethical violations. Again, no Garrity warning was provided.
31. No pre-termination hearing was conducted, no formal written charges were issued in compliance with due process standards, and Plaintiff was never advised that she was under investigation for any policy violations. Plaintiff was denied a name-clearing hearing, despite the clear stigma imposed by her termination and CLEST decertification referral.
32. The CLEST referral included false or misleading information suggesting Plaintiff committed "policy violations" or "unauthorized disclosures" without formal findings.
33. Plaintiff's husband, also Bryant Police Department patrol officer, was pulled into a separate meeting with Chief Minden and Asst. Chief Plouch so that they could justify Plaintiff's termination to her husband.
34. On or about July 24, 2025, two supervisors were reprimanded for aggressive handling of the bar case, and there was discussion of the Establishment's connections to city officials.

The officers who made the initial arrest on June 28, 2025, were called and told that they messed the case up because there was no probable cause for arrest. They were also told that the location was not a “gang bar” and that the officers had tunnel vision on the night of arrest due to the Bandidos being involved.

35. Defendants continued to publish, repeat, or fail to correct false narratives about Plaintiff’s conduct, causing reputational harm and foreclosing future employment opportunities.
36. After her termination, Plaintiff filed a claim for unemployment benefits and the City of Bryant Objected, citing “misconduct” as the basis for termination, resulting in Plaintiff’s claim being denied.
37. Plaintiff appealed the denial of her benefits and was provided the opportunity to be heard on the matter on September 22, 2025.
38. The hearing officer issued a decision stating that the employer did not demonstrate by the preponderance of the evidence that Plaintiff violated the directive regarding discussing the case and found that the Plaintiff was discharged from her job for reasons other than misconduct in connection with her job.
39. On or about September 24, 2025, Plaintiff was advised via a letter from the Division of Law Enforcement Standards and Training that the Commission did not find reasonable basis to proceed to a hearing and therefore, Plaintiff was still eligible to serve as a law enforcement officer in the State of Arkansas.
40. At all relevant times, Plaintiff acted in good faith and within her constitutional and statutory rights to report wrongdoing.
41. The actions of Defendants were designed to silence, punish, and discredit her for exposing internal misconduct, and to insulate the department from external scrutiny.



42. The described conduct was carried out by multiple actors acting in concert, using official channels and informal retaliation tactics, constituting a pattern of malicious and coordinated civil conspiracy.
43. Plaintiff's termination and the public statements made by Defendants concerning her dismissal, coupled with the CLEST decertification referral, have left false and stigmatizing allegations in her professional record, severely damaging her reputation and ability to secure future employment in law enforcement, in which she has a legitimate property interest in.

**CLAIM I: VIOLATION OF THE ARKANSAS WHISTLE-BLOWER ACT (A.C.A. § 21-1-601 et seq.)**

44. Plaintiff incorporates paragraphs 1 – 44 as if fully restated.
45. Defendant City of Bryant is a “public employer” within the meaning of Ark. Code Ann. § 21-1-602(5).
46. Plaintiff Shanna Hastings was a public employee employed by the City of Bryant.
47. Plaintiff engaged in protected activity by communicating in good faith to “appropriate authorities” (as defined by Ark. Code Ann. § 21-1-602(2)) the existence of waste, violations of law, and abuse of authority within the Bryant Police Department.
48. These communications included but were not limited to (a) reporting suspicious conduct by Captain Johnston during a criminal investigation and ABC inspection to her supervisor, Lt. Scotty Courtney and Chief Carl Minden; (b) communicating concerns regarding potential gang-related interference in investigations and miscues of law enforcement databases to her supervisors, including the Chief of Police, and to Prosecutor Chris Walton; (c) potential mismanagement and abuse of authority within the Bryant Police Department;

and (d) pointing out prior instances in which officers had concerns of similar conduct by Captain Johnston at the same location.

49. The subject matter of Plaintiff's communications concerned matters well beyond mere personnel grievances, directly implicating public safety, law enforcement integrity, potential violations of rules and policies of the department, and potential criminal conduct.
50. Defendant's took adverse action against Plaintiff by terminating her employment on July 21, 2025, initiating CLEST decertification proceedings, and attempting to block her from obtaining unemployment benefits.
51. Plaintiff's protected communications were a motivating factor in Defendant's decision to take adverse action against her, as evidenced by the close temporal proximity between her reports and termination, and the explicit linkage of her communications to the stated reasons for her dismissal.
52. Defendant's actions constitute a violation of the Arkansas Whistle-Blower Act, Ark. Code Ann. § 21-1-603.
53. As a direct and proximate result of Defendant's violations of AWBA, Plaintiff has suffered loss of employment, lost wages, and lost employment benefits as well as emotional distress.
54. Any and all actions of the City of Bryant, Chief Minden, and Mayor Treat forming the basis of Claim I were performed by them under color of state law and in their official capacities only as they are employees and final policymakers of the City of Bryant.
55. Pursuant to A.C.A. § 21-1-605, Plaintiff is entitled to relief including but not limited to reinstatement to her former position or an equivalent position, restoration of full fringe benefits and retirement service credit, compensation for lost wages and benefits, and payment of reasonable court costs and attorney's fees.

**CLAIM II: TERMINATION OF EMPLOYMENT IN VIOLATION OF PUBLIC POLICY.**

56. Plaintiff incorporates paragraphs 1 – 56 by reference.
57. Defendants terminated Plaintiff for reporting suspected misconduct, possible policy and ethical violations, and potential criminal activity, all in violation of a well-established public policy of the state.
58. Plaintiff was terminated for adhering to her ethical and professional obligations as a law enforcement officer to report suspected criminal activity and misconduct, for cooperating with external authorities regarding the investigation, and engaging in conduct protected by both the Arkansas Whistleblower's Act and the Constitution of the State of Arkansas.
59. Defendants were aware of Plaintiff's concerns that she voiced because Plaintiff brought those concerns directly to the attention of the Chief of Police and other supervisors within her chain of command.
60. There was a direct relationship between Plaintiff's protected conduct and her termination in that the policy violation cited as the basis for her termination was due to her speaking with the prosecuting attorney about her investigation and her concerns.
61. Plaintiff's termination for these reasons constitutes a wrongful discharge in violation of clear, well-established public policy.
62. As a direct and proximate result of Defendant's violations of AWBA, Plaintiff has suffered loss of employment, lost wages, and lost employment benefits as well as emotional distress and damage to her reputation, both personally and professionally.
63. Any and all actions of the City of Bryant, Chief Minden, and Mayor Treat forming the basis of Claim I were performed by them under color of state law and in their official capacities only as they are employees and final policymakers of the City of Bryant.

**CLAIM III: VIOLATION OF ARTICLE 2, SECTION 6 OF THE ARKANSAS CONSTITUTION: FREE SPEECH.**

64. Plaintiff re-alleges and incorporates all foregoing paragraphs by reference
65. Article 2, Section 6 of the Arkansas Constitution states, “[t]he free communication of thoughts and opinions, is one of the invaluable rights of man; and all persons may freely write and publish their sentiments on all subjects, being responsible for the abuse of such right.”
66. Plaintiff engaged in protected speech as a private citizen on matters of public concern, including reporting suspected misconduct, corruption, and gang-related interference within the Bryant Police Department and to external authorities, including Prosecuting Attorney Chris Walton and Agents of the Arkansas Alcoholic Beverage Control Agency.
67. Defendants, acting in both their official capacities and individual capacities, subjected Plaintiff to adverse employment actions, including termination, removal from assignments, referral for decertification through the Arkansas Commission on Law Enforcement Standards and Training, and denial of unemployment benefits.
68. These actions would deter a person of ordinary firmness from exercising their state constitutional rights to free speech.
69. Plaintiff’s protected speech was a substantial and motivating factor in Defendants’ adverse actions, evidenced by the close temporal proximity (July 2-9, 2025, disclosures and July 21, 2025, termination). This is also shown by the termination letter explicitly referencing Plaintiff’s communication with the prosecutor as “insubordination.”
70. Defendants Mayor Chris Treat and Chief Carl Minden, in both their official and individual capacities, unreasonably violated the Plaintiff’s clearly established right to free speech under the Arkansas Constitution.

**CLAIM IV: VIOLATION OF ARTICLE 2, SECTIONS 2 AND 13 OF THE ARKANSAS CONSTITUTION: DUE PROCESS.**

71. Plaintiff re-alleges and incorporates all foregoing paragraphs by reference.

72. Pursuant to Article 2, Section 2 of the Arkansas Constitution,

[a]ll men are created equally free and independent, and have certain inherent and inalienable rights; amongst which are those of enjoying and defending life and liberty; of acquiring, possessing and protecting property, and reputation; and of pursuing their own happiness. To secure these rights governments are instituted among men, deriving their just powers from the consent of the governed.

73. Pursuant to Article 2, Section 13 of the Arkansas Constitution, “[e]very person is entitled to a certain remedy in the laws for all injuries or wrongs he may receive in his person, property or character; he ought to obtain justice freely, and without purchase; completely, and without denial; promptly and without delay; conformably to the laws.

74. In connection with Plaintiff’s termination of employment, Defendants made false and stigmatizing statements (e.g., “insubordination,” “failure to obey directives,” implications of CLEST decertification) that attacked her professional reputation and foreclosed future employment, especially in the field of law enforcement.

75. Defendants publicly disseminated these statements through CLEST decertification referral, through denial of Plaintiff’s unemployment benefits, and by placing false allegations in her personnel file.

76. Plaintiff’s legal status as a certified law enforcement officer was altered by her termination.

77. Plaintiff was denied a meaningful name-clearing hearing to address these false and stigmatizing allegations, both prior to and immediately following her termination. She was effectively denied any notice of what she was accused of and denied an opportunity to respond.

78. Pursuant to the Bryant Police Department's Policy Manual, employees must be aware of what they can be disciplined for, evidence used in disciplinary actions should be substantially credible, members should know all of the facts of discovery at the appropriate time and in the appropriate manner.
79. Additionally, Bryant Police Department Policy states that members should have an opportunity to defend themselves and that there should be no elements of surprise in a disciplinary action.
80. Furthermore, Bryant Police Department Policy recognizes "procedural justice" and states that members should receive advance notice of the possible or probable disciplinary consequences of their conduct; a reasonable relationship exists between the rule and the safe and efficient operation of the agency; fact-finding efforts were made before termination was imposed; a fair and objective investigation was held; substantial evidence exists to prove the member is guilty as charged; discipline is applied without unlawful discrimination; and the degree of discipline is reasonably related to the seriousness of the offense as well as the member's service record as a cooperative and productive member.
81. Bryant Police Department Policy states that the agency will use progressive disciplinary action to bring about change once it is shown that a member knew or should have known that their conduct failed to comply with established directives.
82. Under the agency's Uniform Standards of Conduct, when addressing insubordination and refusal to obey directives, the member's belief that a directive was criminal or unconstitutional "will not protect a member's job if such belief fails to be established in a later hearing." However, despite a hearing being specifically mentioned in the policy, Plaintiff was not afforded any such hearing before being terminated.

83. Despite the agency's attempt to say that the agency's policies and procedures manual does not constitute any sort of written or implied contract for employment, the contents of the manual suggest otherwise.
84. The manual states "[i]n publishing the uniform standards manual, management recognizes that members too have a need for job security and to be treated fairly in administrative decisions affecting their employment status, particularly in discipline and termination actions."
85. The Bryant Police Department policy manual has clear provisions addressing notice requirements regarding termination, the evidence the department must provide against the employee, and the employees opportunity to be heard.
86. Furthermore, the policy manual recognizes a progressive disciplinary process.
87. The Defendants did not follow the department policy when it came to Plaintiff's discipline and termination and certainly did not follow the progressive disciplinary process, a fact that the city's Human Resources director testified to in the unemployment appeal hearing.
88. During this appeal hearing, the hearing officer found that the Plaintiff did not violate any directives or rules of the department, and that the Plaintiff was discharged from her employment for reasons other than misconduct on her part.
89. The Bryant Police Department policies contain mandatory and binding language and provisions that promise and guarantee specific procedures related to disciplinary actions.
90. These provisions related to discipline are clear and appear to be mandatory that they override any general disclaimer the City of Bryant has placed in their policy manuals.
91. Because of the clear disciplinary procedures and policy provisions related to disciplinary and termination, and the department's failure to follow those provisions and policies as

they relate to Plaintiff's termination, there existed an implied employment contract between the Plaintiff and the City of Bryant requiring that the Plaintiff be provided with due process before being terminated.

92. As a direct and proximate result, Plaintiff suffered severe emotional distress, irreparable damage to her professional reputation, and significant impairment of her future employment prospects.
93. Defendants, in both their official and individual capacities, unreasonably violated Plaintiff's liberty interest rights without due process.

**CLAIM V: VIOLATION OF THE ARKANSAS CIVIL RIGHTS ACT OF 1993 (A.C.A. § 16-123-105).**

94. Plaintiff re-alleges and restates the foregoing paragraphs by reference.
95. Defendants, acting both in their official and individual capacities, acting under the color of state law, deprived Plaintiff of her right to free speech, due process, and equal protection, as guaranteed by the Arkansas Constitution.
96. Plaintiff's right to her reputation is explicitly protected by Article 2, Section 2 of the Arkansas Constitution providing a textual basis for the right to a name-clearing hearing.
97. Defendants' actions, including retaliating against the Plaintiff for her protected speech, depriving her of liberty and property interests without due process, and engaging in discriminatory treatment, constitute violations of the Arkansas Civil Rights Act.
98. As a direct and proximate result of Defendants' violations of the ACRA, Plaintiff has suffered severe mental and emotional distress, damage to her personal and professional reputation, loss of current and future wages, and loss of employment benefits.
99. As a result of Defendants' actions, Plaintiff is entitled to actual, compensatory, and punitive damages.



**CLAIM VI: DEFAMATION, LIBEL, SLANDER, AND FALSE LIGHT UNDER ARKANSAS STATE COMMON LAW.**

100. Plaintiff re-alleges and restates the foregoing paragraphs by reference.
101. Defendants made false and defamatory statements of fact concerning Plaintiff, including but not limited to accusations of “insubordination,” “failure to obey directives,” and implications of dishonesty or unfitness for duty related to her protected communications and the CLEST decertification referral.
102. These false and defamatory statements were published to third parties, including but not limited to CLEST personnel, Arkansas Division of Workforce Services personnel, Plaintiff’s husband, and potentially other law enforcement agencies and the public.
103. Defendants knew that because Plaintiff was terminated, her personnel file and documents related to her employment and termination would be subject to release to the public through the Arkansas Freedom of Information Act.
104. At minimum, Defendants acted with negligence, and in many instances in this case, acted with malice or reckless disregard for the truth in making and publishing these statements.
105. Defendants’ actions placed Plaintiff in a false light before the public and the law enforcement community, which would be highly offensive to a reasonable person, and Defendants acted with knowledge or reckless disregard as to the falsity of the published matter and the false light in which Plaintiff would be placed.
106. As a direct and proximate result of Defendants’ defamation and false light, Plaintiff has suffered significant damage to her personal and professional reputation, severe mental and emotional distress, and impairment of her ability to secure future employment in law enforcement.
107. These actions of the Defendants were done in both their official and individual capacities.

**CLAIM VII: CIVIL CONSPIRACY UNDER ARKANSAS STATE COMMON LAW.**

108. Plaintiff re-alleges and restates the foregoing paragraphs by reference as if fully set for the herein.
109. Defendants, along with other unnamed co-conspirators, combined and agreed to accomplish an unlawful and oppressive purpose: to retaliate against Plaintiff for her protected speech and whistleblowing activities, to deprive her of her constitutional and statutory rights, and to damage her personal and professional reputation and career, thereby concealing or discouraging reports of misconduct within the Bryant Police Department, including but not limited to the alleged association of police officers with outlaw motorcycle gangs.
110. In furtherance of this conspiracy, Defendants committed overt acts, including but not limited to: initiating a pretextual internal investigation; questioning Plaintiff about her protected communications; terminating Plaintiff's employment under false pretenses; referring Plaintiff for CLEST decertification based on false allegations; making false and stigmatizing statements to others; denying Plaintiff a name clearing hearing; and engaging in a pattern of conduct to silence whistleblowers.
111. Defendants acted with malice and outside the scope of their employment and for their own personal benefit in participating in this conspiracy. Their actions were not for the legitimate benefit of the City of Bryant, but to protect themselves and others from scrutiny regarding alleged misconduct (including Captain Johnston's possible alleged association or involvement with an outlaw motorcycle gang and possible interference with pending investigations) and to punish the Plaintiff. This malicious intent and personal benefit

overcome the intra-corporate conspiracy doctrine and statutory immunity under state law, as well as under A.C.A. § 21-9-301 and any other Arkansas law related to immunity.

112. As a direct and proximate result, Plaintiff suffered severe emotional distress, irreparable damage to her personal and professional reputation, and lost wages and benefits.
113. The unlawful and oppressive purpose of this conspiracy was to retaliate against Plaintiff for her protected speech and whistleblowing activities, to deprive her of her constitutional and statutory rights, and to damage her personal and professional reputation and career, thereby concealing or discouraging reports of misconduct within the Bryant Police Department.
114. As a direct and proximate result of Defendant's conspiracy, Plaintiff has suffered severe mental and emotional distress, irreparable damage to her professional reputation, damage to her personal relationships and reputation, loss of current and future wages, and loss of employment benefits.
115. These actions of the Defendants were done in both their official and individual capacities.

**CLAIM VIII: TORT OF OUTRAGE (INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS.**

116. Plaintiff re-alleges and restates the foregoing paragraphs by reference as if fully set for the herein.
117. The Tort of Outrage requires clear-cut proof of four essential elements, which Plaintiff asserts are met by the facts pleaded herein.
118. Defendants' termination of the Plaintiff's employment because of her participation in protected activity—especially Plaintiff's reporting of suspected misconduct, possible corruption, or even possible criminal activity—can only be described as atrocious and intolerable in a civilized society.

119. The conduct of the Defendants was extreme and outrageous, going beyond all possible bounds of decency, which satisfies the first element of the Tort of Outrage.
120. Even if Defendants did not intend to inflict emotional distress upon the Plaintiff, Defendants' willfully and wantonly knew or should have known that emotional distress was the likely result of their conduct.
121. Defendant Chief Carl Minden knew that the Plaintiff was a dedicated employee with numerous letters of commendation and that her job as a detective was very important to her.
122. Furthermore, Defendant Chief Carl Minden also knew that the Plaintiff had recently lost her brother making her even further susceptible to distress.
123. Despite Defendant Chief Carl Minden's knowledge that Defendant was particularly susceptible to distress, and that severe emotional distress was the likely outcome of her being wrongfully terminated, Defendant went ahead and terminated her anyway.
124. The Defendants' conduct satisfies the second necessary element in the Tort of Outrage, willful and wanton conduct.
125. The Defendants' wrongful termination in violation of Plaintiff's protected conduct, referral to CLEST for decertification, denial of unemployment benefits, and publication of false statements, among other conduct, were the proximate cause of the Plaintiff suffering emotional distress as well as the damages that resulted, which satisfies the third element necessary in a claim for the Tort of Outrage.
126. As a result of Defendants' actions, she has lost her source of income as well as all benefits tied to her employment, causing substantial financial difficulties for Plaintiff, her husband, and her children.

127. Additionally, because Defendants objected to her attempts to obtain unemployment benefits, Plaintiff was forced to appeal through Division of Workforce Services, causing additional stress and financial hardship.
128. Furthermore, Defendants' false claims of insubordination and failure to follow directives along with their request to have Plaintiff decertified through CLEST, have caused Plaintiff even more stress and hardship.
129. After Defendants informed the Plaintiff that she was terminated, Defendants called Plaintiff's husband, who also works for the Bryant Police Department, into a meeting with the Chief so that the Chief could justify the termination to Plaintiff's husband.
130. Defendants' false statements to the Plaintiff's husband resulted in damage to the Plaintiff's reputation with her husband.
131. Additionally, Plaintiff's wrongful termination has resulted in serious marital problems between her and her husband.
132. Plaintiff is currently seeing a therapist to address her emotional distress and since her wrongful termination, she has had to increase the prescription medications she takes.
133. As a direct result of Defendants' conduct, Plaintiff suffered and continues to suffer from severe emotional distress, including medically diagnosed post-traumatic stress disorder, severe anxiety, clinical depression, and inability to sleep, requiring ongoing treatment by mental health professionals.
134. Plaintiff's severe emotional distress is a direct result of conduct of the Defendants' done in both their individual and official capacities.

135. Plaintiff should be awarded all compensatory damages, including but not limited to, damages for severe emotional distress, mental anguish, past and future medical and psychological expenses, in an amount determined by the trier of fact.
136. Additionally, Plaintiff should be awarded punitive damages against the individual Defendants in their individual capacities, and the Plaintiff asserts that the Defendants' conduct was malicious, willful, and wanton, and that the Defendants intentionally pursued a course of conduct for the purpose of causing injury. Therefore, Plaintiff seeks punitive damages in an amount sufficient to punish the Defendants and deter others from similar conduct.
137. All relief sought by the Plaintiff for all claims is sought exclusively under the laws and Constitution of the State of Arkansas. Plaintiff does not assert any claim arising under federal law or the United States Constitution.
138. Plaintiff hereby reserves the right to amend this Complaint to conform to evidence adduced in discovery, to seek additional damages, or to assert additional claims as they become known.

**DEMAND FOR JURY TRIAL.**

Pursuant to Rule 38 of the Arkansas Rules of Civil Procedure and Article 2, Section 7 of the Arkansas Constitution, Plaintiff hereby demands a trial by jury on all issues triable of right by a jury in the above action.

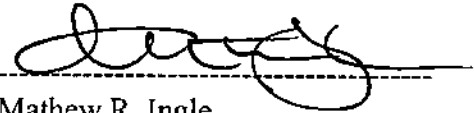
**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, SHANNA HASTINGS, prays for judgment against Defendants CITY OF BRYANT, CARL MINDEN, and CHRIS TREAT, jointly and severally, for the following relief:

1. For a Declaratory Judgment that Defendants violated Plaintiff's rights to protected speech under the Arkansas Constitution, rights to due process (liberty and property interests) under the Arkansas Constitution, and rights under the Arkansas Whistle-Blower Act and Arkansas Civil Rights Act.
2. For Defendants to provide Plaintiff with a full and fair name-clearing hearing before an impartial body, with the right to testify, present evidence, call witnesses, and cross-examine adverse witnesses, including Chief Carl Minden, Mayor Chris Treat, and Captain Nate Johnston.
3. For an Order requiring Defendants to purge all false and stigmatizing information from Plaintiff's personnel file and to retract all negative statements concerning her termination.
4. For an award of compensatory damages for all injuries sustained, including but not limited to lost wages, lost benefits, emotional distress, and reputational harm, in an amount to be determined at trial.
5. For an award of punitive damages against Defendants Carl Minden and Chris Treat, in their individual capacities, for their malicious, willful, and reckless disregard of Plaintiff's constitutional rights and the harm that resulted.
6. For an award of reasonable attorney's fees and costs incurred in this action, pursuant to Ark. Code Ann. § 21-1-605 and all other statutory law and common law applicable to attorney's fees and costs.
7. For a trial by jury on all issues so triable.
8. For any and all other relief, both at law and in equity, to which Plaintiff may be justly entitled.

By: INGLE LAW FIRM  
7076 Bauxite Highway, Suite 6

Bauxite, AR 72011  
Office: (501) 326-5026  
Fax: (501) 387-4190  
Email: mat@theinglelawfirm.com



Mathew R. Ingle  
ABN 2021160  
Attorney for Plaintiff Shanna Hastings

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of December 2025, I caused a copy of the foregoing Complaint to be issued and delivered to the process server for service upon all Defendants by personal service in the manner required by Rule 4 of the Arkansas Rules of Civil Procedure.



Mathew R. Ingle  
ABN2021160  
Attorney for Plaintiff Shanna Hastings