

NOTICE OF TORT CLAIM

March 26, 2026

Name of Petitioner:

Randy A. Howard
3300 Locust Street
New Castle, Indiana 47362

Name of Claimant(s)

John Sproles, Henry County Sheriff
1033 Ron Lampe Wy.
New Castle, Indiana 47362

Susan Huhn, Henry County Commissioner (Southern District)
Steve Dellinger, Henry County Commissioner (Middle District)
Joe Wiley, Henry County Commissioner (Northern District)
101 South Main Street Suite 213
New Castle, Indiana 47362

SERVED ELECTRONICALLY VIA EMAIL: jsproles@henrycounty.in.gov
shuhn@henrycounty.in.gov
sdellinger@henrycounty.in.gov
jwiley@henrycounty.in.gov

Tort Claim Notice – Slander and Defamation on a Government Social Media Page.

1. Circumstances of incident:

On February 6, 2026 Henry County Sheriff John Sproles deliberately and intentionally posted a video on the Henry County Sheriffs Office (Government social media page) “Page”. The video was titled: “Statement of factual evidence regarding the recent incarceration of Nicholas Gulley II”.

As of this date March 26, 2026, the video has 1.8K views, 223 shares and numerous commits.

In the content of the released video statement by Sheriff John Sproles, he states the following as fact:

- “I want to take a few minutes today address the recent blatantly false allegations by Randy Howard, who is a known misinformation propagandist.”
- “By definition, a misinformation propagandist is an individual, group, or entity that deliberately and systematically spreads false, inaccurate, or misleading information to shape public

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perception, manipulate emotions, and advance a specific political, ideological, or commercial agenda.”

- “Randy Howard is most certainly a misinformation propagandist”.
- “Due to these false allegations, Randy has incited much hostility and threats of violence toward our local law enforcement officers.”

All of the above statements made by Sheriff Sproles have no merit, and are false.

Stating that I, Randy Howard incited “hostility and threats of violence toward law enforcement” was stated as fact, not an opinion to the general public, If such a threat was made, or incited, it would be a serious criminal offense. There have been no investigation, no arrest, no evidence, or proof which validates, or verifies that I knowingly urged others by solicitation, command, or induced to commit, or persuade another person to engage in a crime of violence against any Law Enforcement person, or property.

The statements made by Henry County Sheriff John Sproles on the Henry County Sheriffs Facebook Page are meritless, false, and without evidence. More than ample time to investigate any such alleged serious crime has long surpassed.

I deny each and every claim made by Sheriff John Sproles. Sheriff Sproles deliberately, and intentionally made these statements, with malice, with the intent to caused damage to my reputation and did so in his official capacity as Sheriff of Henry County to the general public.

2. Residence of Person Making the Claim: 3300 Locust Street New Castle, Indiana

3. Extent of Loss:

The allegations made by Sheriff Sproles of inciting violence against law enforcement, and stating “Randy Howard is most certainly a misinformation propagandist” portrays myself to the general public as a dishonest, disgraceful, wretched person being a catalyst to incite others to harm Law Enforcement. The allegation is embarrassing, and distressing. I'm humiliated, and embarrassed as many viewed, and shared the video on social media for all to see.

Damages are on going as misrepresentations on the Henry County Sheriffs Facebook page remain a matter of public record, and viewable to date on social media as statements of facts by everyone.

A petition with a court is highly probable at which a jury may ask to determine damages for slander and or defamation.

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4. Time and place of loss:

February 6, 2026 on the Henry County Sheriffs Office Official Facebook government page.

5. Names of All Persons Involved at a minimum:

Henry County Sheriff John Sproils

6. Spoliation Notice

Consider this Notice as a demand to preserve any and all evidence regarding the production of the video posted by Sheriff Sproles on the Henry County Government Facebook Page on February 6, 2026.

- Notes, scripts, emails, investigation reports, texts, or any evidence that justifies the content, or in relation to the allegations that Sheriff Sproles mention in the video.
- Preserve and protect the February 6, 2026 video produced and posted by Henry County Sheriff John Sproles on the Henry County Sheriff Office Facebook Page.

Additional names may be added, if discovered involvement as it concerns any Henry County government entity or employee,

I swear and affirm, under the penalties of perjury, that the foregoing information is true, and correct to the best of my knowledge and belief.

Respectfully,

Randy A. Howard

cc: Jeff Bate, Attorney at Law