

STATE OF INDIANA	)	
	)	SS: IN VANDERBURGH CIRCUIT COURT
COUNTY OF VANDERBURGH	)	
SHANE HENDRIX,	)	82C01-2504-CT-002080
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
FRANKLIN ST OPERATING LLC,	)	
D/B/A CHASER'S BAR & GRILL,	)	
	)	
Defendant.	)	



COMPLAINT FOR DAMAGES

Comes now the Plaintiff, Shane Hendrix, by counsel, Neil Chapman of Chapman Law LLC, and for his Complaint against Chaser's Bar & Grill, alleges and says:

1. Defendant, Franklin St Operating LLC, is an Indiana limited liability company that does business as *Chaser's Bar & Grill* at 2131 W. Franklin Street in Evansville, IN.
2. Jurisdiction and venue are proper in this Court because the incident giving rise to this claim occurred within Vanderburgh County.
3. On April 6, 2025, Shane Hendrix was a patron at Chaser's when there was a verbal dispute between Shane and a bartender over his tab. Shane used regrettable profanity with the bartender.
4. That's when Chaser's employees and/or agents, specifically two bouncers by the names of Sean D. Shell and Johnathan P. Turner, forcibly intervened. Instead of escorting Shane outside in a safe and reasonable manner, the bouncers took him to the ground then punched, kicked and kneeled on Shane multiple times. Then they dragged Shane, stopping at least once for additional beating, on the way out of the bar.

5. The Chaser's bouncers engaged in a prolonged and brutal beating of Shane, striking and kicking him until he was rendered unconscious and bleeding.

6. The excessive force used by the bouncers far exceeded the scope of reasonable conduct for bouncers.

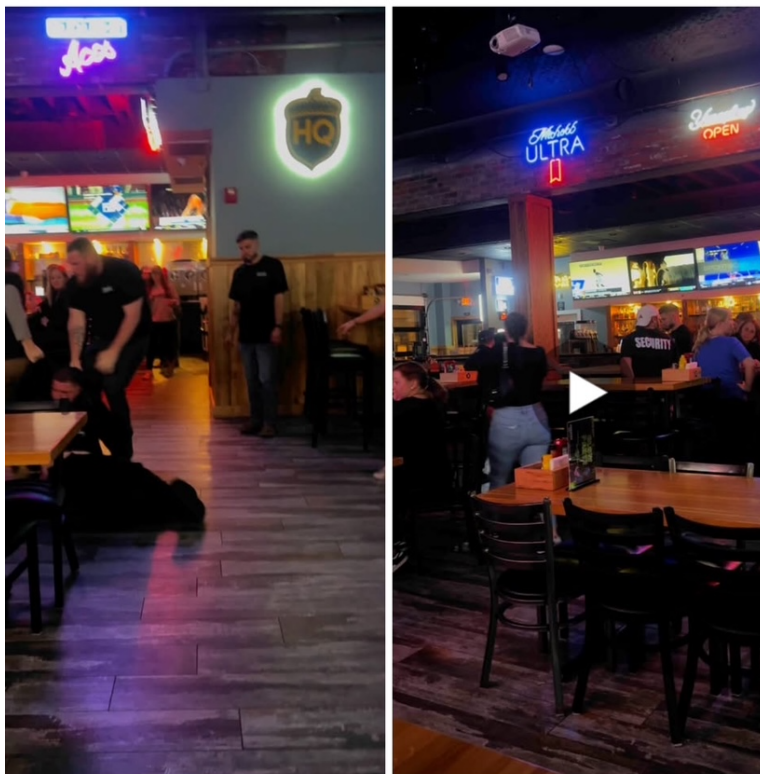
7. Most of the beating was captured on video by a patron, whose bystander footage has been widely circulated on social media—*below Facebook post indicates 6,000 comments and 7,400 shares*— and accurately depicts the events that took place.



Audrey Stutsman

1d • 🌐

Idk but I really don't think that security at Chaser's in Evansville needed to do all that... (this dude was mouthing off and got in the women's face, but this is pretty excessive)



🤔👎👍 Jon B. + 3.7K 6K comments 7.4K shares

👍 Like

💬 Comment

📧 Send

➦ Share

8. The Evansville Chief of Police, Philip Smith, released a public statement acknowledging in pertinent part:

- The bouncers' conduct was "unreasonable, brutal, and illegal."
- That "those bouncers should be arrested."¹
- That the bystander video clearly captured the unlawful beating.
- That the bouncers' false narrative claimed that [Shane] was the aggressor.



9. Chaser's had a duty to exercise reasonable care in the selection, hiring, training, and supervision of its bouncers.

10. Chaser's direct acts of negligence include, but are not limited to:

- Chaser's failed to adequately screen the bouncers before hiring them;

¹ Sean D. Shell and Johnathan P. Turner were subsequently booked in Vanderburgh County on a felony charge of "Battery - Resulting in Serious Bodily Injury."

- Chaser's failed to provide proper training on restraint, de-escalation tactics, and use of force;
- Chaser's failed to supervise or discipline employees/agents engaging in aggressive or dangerous behavior;
- Chaser's failed to implement policies or procedures to protect its patrons from such abuse occurring.

11. As a direct and proximate result of Chaser's negligent hiring, training, supervision, and failure to otherwise provide a reasonable safe premises, Shane sustained severe physical injuries including multiple facial fractures, loss of a front tooth, emotional trauma, loss of consciousness, and other damages including medical expenses for care and hospitalization, both economic and non-economic, to be proven at trial.

CAUSES OF ACTION

Count I: Premises Liability – Negligent Hiring, Training, and Supervision

12. Plaintiff realleges and incorporates by reference the preceding paragraphs as though fully set forth herein.

13. Chaser's owed Shane a duty to maintain a reasonably safe premises, including employing competent and law-abiding staff.

14. Chaser's breached this duty by hiring, failing to train, and failing to supervise employees who used unlawful and excessive force against Shane, which was the direct and proximate cause of Shane's injuries.

Count II: Vicarious Liability for the Wrongful Acts of its Bouncers

15. Plaintiff realleges and incorporates by reference the preceding paragraphs as though fully set forth herein.

16. Chaser's is also vicariously liable for the wrongful acts of its employees and/or agents as a matter of law per the legal doctrine of *Respondeat Superior*.



PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court enter judgment in his favor and against Defendant, and award:

- Compensatory damages for physical injuries, medical expenses, pain and suffering, mental anguish, physical disfigurement, and emotional distress caused by extreme trauma;
- Punitive damages for willful, wanton and grossly outrageous conduct that shocked the conscience of our community, in order to punish the wrongdoer and deter similar misconduct in the future;
- Any other relief the Court deems just and proper.

WHEREFORE, the Plaintiff, Shane Hendrix, by counsel, respectfully seeks compensatory and punitive damages to be imposed against Defendant Franklin St Operating LLC d/b/a Chaser's Bar & Grill, in an amount sufficiently reasonable to fully compensate the Plaintiff for his damages and to deter the Defendant from similar outrageous misconduct in the future, and for all other relief justified and proper.

Respectfully submitted,

/s/ Neil Chapman

Neil Chapman, IN Bar #17902-71

CHAPMAN LAW LLC

20 NW 3rd Street, Suite 1410

Evansville, IN 47708

Tel: 812.426.0600

neil@chapmanlaw.com

ATTORNEY FOR PLAINTIFF

JURY DEMAND

Plaintiffs respectfully request that a trial by jury be immediately scheduled in this matter.

/s/ Neil Chapman