

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CLANT M. SEAY,	)	
Plaintiff,	)	
	)	
vs.	)	Civil Action No. 1:16-cv-00068
	)	Judge Waverly Crenshaw, Jr.
BUCKY ROWLAND, in his official	)	Judge Joe B. Brown
capacity as Sheriff of Maury County,	)	
Tennessee; Mr. David Sisk,	)	
Mr. Callaway Dial,	)	
Mr. Jerry W. Harris	)	
Defendants.	)	

**FIRST AMENDED VERIFIED COMPLAINT**

Comes now Plaintiff Clant M. Seay, pro se, and avers the following:

**INTRODUCTION**

1. This is a civil rights claim brought under 42 U.S.C. § 1983, alleging that Mr. Bucky Rowland, as Sheriff of Maury County, Tennessee, and his Deputies, acting under color of law, intimidated, threatened, interfered with and deprived Seay and his journalistic associates in the exercise of their First Amendment and Fourteenth Amendment constitutional rights on June 3, 2016, at the Columbia Spring Jubilee Horse Show event held at the public park – “Maury County Park” – owned and operated by Maury County, Tennessee, which said park is located within the municipality of Columbia, Tennessee.

2. Pursuant to 42 U.S.C. § 1983, Plaintiff Clant M. Seay seeks injunctive relief, declaratory relief, nominal damages and other costs and expenses against Bucky Rowland, in his official capacity as Sheriff of Maury County, Tennessee, and all concerned parties.

3. This action is premised on the First and Fourteenth Amendments to the United States Constitution regarding the Defendant's intimidation, threatening, interference with and deprivation of Plaintiff's rights to free speech, freedom of the press and due process.

4. Defendants' actions intimidated, threatened, interfered with and deprived, and will continue to intimidate, threaten, interfere with and deprive the Plaintiff and his journalistic associates in the exercise of his and their constitutional rights.

5. Each and every act of the Defendants, alleged herein, was committed by the Defendants named herein under the color of state law and authority associated with Mr. Bucky Rowland, as Sheriff of Maury County, Tennessee, and his Deputies.

### **JURISDICTION AND VENUE**

6. This action raises federal questions under the First and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983.

7. This Court has original jurisdiction over Plaintiff's claims for injunctive relief and nominal damages by operation of 28 U.S.C. §§ 1331 and 1343. This Court has jurisdiction over Plaintiff's request for declaratory relief by operation of 28 U.S.C. §§ 2201 and 2202. This Court has jurisdiction over requested costs and attorney fees under 42 U.S.C. § 1988, and in the discretion of the Court to award relief.

8. Venue is proper in the Middle District of Tennessee under 28 U.S.C. § 1391(b). All Defendants reside in this district and actions giving rise to this action occurred in this district.

### **PLAINTIFF**

9. Plaintiff Clant M. Seay ("Seay") is a resident of Oxford, Mississippi.

### **DEFENDANTS**

10. Defendant Bucky Rowland, a resident of Williamsport, Tennessee, is the duly-elected Sheriff of Maury County, Tennessee, who is sworn to uphold the respective Constitutions of the United States of America, and the State of Tennessee, and the respective laws of the United States of America, and the State of Tennessee.

11. As Sheriff of Maury County, Tennessee, Mr. Bucky Rowland, is responsible for overseeing and implementing all policies affecting law

enforcement, including law enforcement in public parks owned by Maury County, Tennessee. Sheriff Bucky Rowland is sued in his official capacity as Sheriff of Maury County, Tennessee.

12. Defendant Mr. Jerry W. Harris, videographer, “Big Lick” propagandist, and partner in Peahead Productions, Inc., is a resident of Tullahoma, TN.

13. Defendant Mr. David Sisk, Columbia Spring Jubilee Horse Show Manager and Officer of the Maury County Horsemen's Association, is a resident of Columbia, Tennessee.

14. Defendant Mr. Callaway Dial, Columbia Spring Jubilee Horse Show Ringmaster, and member of the Maury County Horsemen's Association, is a resident of Columbia, Tennessee.

## **STATEMENT OF FACTS**

### **Seay's Desired Expression and Exercise of Constitutional Rights**

15. Seay is a working journalist being the owner/publisher/reporter/photographer/videographer of the website publication [www.billygoboy.com](http://www.billygoboy.com). Seay has journalistic associates/sources who assist him with this work, and many of them are animal welfare advocates with the Citizens Campaign Against “Big Lick” Animal Cruelty (CCABLAC). Seay was adjudicated as a journalist by Maury County Circuit Court Senior Judge Robert L. Jones in Order dated September 29, 2015, entered in the criminal

case of State of Tennessee vs. Jamie B. Lawrence, when Seay was allowed by the Maury County Circuit Court to invoke the Tennessee Reporter Shield law to upholding his refusal to disclose the identity of a confidential source. Further, the Maury County Circuit Court accorded Seay media status under TN Supreme Court Rule 30. Seay has also received media status from the Circuit Court of Marshall County, Tennessee; and from the Circuit Court of Blount County, Tennessee. See a certified copy of said Order which is Exhibit D to the Affidavit of Clant M. Seay, attached hereto as **Exhibit “A”**. See also a copy of “Clant M. Seay – Professional Journalist Credentials” which is Exhibit “C” to the Affidavit of Clant M. Seay, attached hereto as **Exhibit “A”**.

16. Seay is also an animal welfare advocate associated with the Citizens Campaign Against “Big Lick” Animal Cruelty. Seay makes arrangements and facilitates this grassroots group in the exercise of their constitutional rights to free speech to oppose and protest “Big Lick” Animal Cruelty in public venues such as along public streets and roadways and in public parks. Seay covers for [www.billygoboy.com](http://www.billygoboy.com) the activities of this grassroots group.

17. Seay and his journalistic associates, and citizens associated with the Citizens Against “Big Lick” Animal Cruelty, attend horse shows held in public parks where “Big Lick” Tennessee Walking Horses are exhibited and

they take photographs and videos of the events, and publish same on the [www.billygoboy.com](http://www.billygoboy.com) websites, and social media such as Facebook and Twitter.

18. On behalf of [www.billygoboy.com](http://www.billygoboy.com), Seay attends horse shows in public parks to gathers news, and report on what goes on at these horse shows. In exercising their rights to Freedom of the Press under the First Amendment of the U. S. Constitution, Seay and representatives of [www.billygoboy.com](http://www.billygoboy.com) take photographs and make videos of activities that take place at the horse shows in public parks, and publish same on the [www.billygoboy.com](http://www.billygoboy.com) websites, and social media such as Facebook and Twitter. The videos have been distributed all over the World, and two Videos used to depict the story of an abused “Big Lick” Tennessee Walking Horse named Gen’s Ice Glimmer, #24704770, Blood Type # TWT050457 has been viewed over 1,7000,000 times, and reached approximately 3,500,000 persons with over 12,000 Facebook shares and over 20,000 Comments condemning the exhibition of “Big Lick” Tennessee Walking Horse as Animal Cruelty.

19. On Friday, June 3, 2016, Bucky Rowland, as Sheriff of Maury County, after conspiring with, Columbia Spring Jubilee Horse Show Chairman Mr. David Sisk and Mr. Jerry W. Harris, and their agents, Sheriff Rowland, and his Deputies, under color of law, approached Seay, his journalistic associates

and animal welfare advocates with the Citizens Against “Big Lick” Animal Cruelty and intimidated, threatened and interfered with Seay and his journalistic associates/animal welfare advocates in the exercise of their constitutional rights and instructed Seay to turn off their video cameras and stop videoing events taking place at the Columbia Spring Jubilee Horse Show at the Maury County Park (Columbia, TN), or there could/would be civil and criminal consequences if they did not do so. By doing these things, Mr. Bucky Rowland, as Sheriff, referenced an alleged Agreement entered into by Columbia Spring Jubilee Horse Show Chairman Mr. David Sisk which forbid citizens or Seay acting as a journalist from making videos of what was going on at the Columbia Spring Jubilee at the public Maury County Park and providing them to the public. By doing this, Sheriff Bucky Rowland intimidated, threatened and interfered with and attempted to deprive Seay, and his journalistic associates, who were attending the horse show of their First Amendment constitutional rights. See the digital recording made by Seay when he turned on his recorder on June 3, 2016, while speaking to Sheriff Rowland and recorded Sheriff Rowland who told Seay “I have asked you to turn your video cameras off ...” and mentioning possible civil and criminal consequences, which is Exhibit “E” to the Affidavit of Clant M. Seay, attached hereto as **Exhibit “A”**.

20. Additionally, Maury County Sheriff Bucky Rowland, at the behest, insistence and assistance of fellow state actors, Mr. David Sisk, Mr. Jerry W. Harris, and Mr. Callaway Dial, instructed his Deputy Sheriffs to instruct persons to not make videos and put them on the internet. See the undercover video made by an undercover reporter for [www.billygoboy.com](http://www.billygoboy.com) publication which documents the said actions of Maury County Deputy Sheriff Coby Bear and “Big Lick” videographer/propagandist Mr. Jerry Harris, and those of Sheriff Bucky Rowland reading criminal penalties the reporter could incur for videoing at the horse show and putting them on the internet and social media, which is Exhibit “G” to the Affidavit of Clant M. Seay, attached hereto as **Exhibit “A”**.

21. Following the conclusion of Columbia Spring Jubilee Horse Show on June 4, 2016, Seay requested on numerous occasions, including in writing on July 12, 2016, and July 14, 2016, that Columbia Spring Jubilee Horse Show Chairman David Sisk provide Seay with a copy of the alleged agreement that Sisk executed on behalf of the Maury County Horsemen's Association which Bucky Rowland, Sheriff of Maury County was attempting to enforce when he intimidated, threatened and interfered with and attempted to deprive Seay and his journalistic associates/animal welfare advocates from exercising their First and Fourteenth Amendment rights on



June 3, 2016, at the Columbia Spring Jubilee Horse Show being held in the public Maury County Park. See the Agreement between Mr. Sisk and Mr. Harris, which is Exhibit “T” to the Affidavit of Clant M. Seay, attached hereto as **Exhibit “A”**. Horse Show Chairman Mr. David Sisk notified Seay that he would not provide Seay a copy of the alleged Agreement because the Maury County Horsemen's Club took a vote against it. In depositions conducted of Mr. David Sisk on March 24, 2017, Mr. Sisk testified that there were eight members of the Maury County Horsemen's Association.

**Maury County Horsemen's Association**

**Eight Members**

David Sisk – Horse Show Manager

Terry Dial (Maury County Deputy Sheriff Employed by Sheriff Rowland)

Yolanda Dial - Treasurer

Callaway Dial – Show Ringmaster (Son of Mr. Terry Dial)

Larry Brewer

Brian Brewer

Bobby Berry

D.C. Nealy

22. The plaintiff alleges that Defendants Mr. David Sisk, and Mr. Jerry Harris maliciously, intentionally, recklessly and outrageously schemed, colluded and conspired as state actors, along with Maury County Sheriff Bucky Rowland, and his Deputies, all acting under color of state law, to injure, oppress, threaten, intimidate and deprive the plaintiff (publisher of

[www.billygoboy.com](http://www.billygoboy.com) publication) and his journalistic associates/animal welfare activists from being able to freely exercise their First Amendment and Fourteenth Amendment constitutional rights to take videos and photos at the Columbia Spring Jubilee Horse Show in Maury County Park on June 3, 2016, for the purpose of putting them on the internet and social media in inform the public and for the world to see the “Big Lick” Animal Cruelty to Tennessee Walking Horses.

23. The impetus for the actions of both Mr. Jerry W. Harris and Mr. David Sisk and Mr. Callaway Dial is that they are stubbornly dedicated to the perpetuation of the “Big Lick” Tennessee Walking Show Horse which wears approximately EIGHT POUND shoes and is shown in CHAINS (only breed in America to do so). According to MTSU (Middle Tennessee State University) Horse Science Professor Equine Vet Dr. John Haffner in a letter dated November 25, 2013, the “Big Lick” – “is a business built on the suffering and pain of horses”. See Dr. Haffner’s letter which is Exhibit “P” to the Affidavit of Clant M. Seay, attached hereto as **Exhibit “A”**. See also the video, “What ‘Soring’ Does To Horses”, now viewed over 12,900,000 times, which is Exhibit “A” to the Affidavit of Clant M. Seay, attached hereto as **Exhibit “A”**.

24. Mr. David Sisk is a dedicated proponent of the “Big Lick”. He is a wealthy Maury County, Tennessee landowner, who has several hundred thousand dollars invested in “Big Lick” Tennessee Walking Horses with a large barn and broodmare band. Mr. Sisk also exhibits “Big Lick” Tennessee Walking Horses at horse show venues in several states. Mr. Sisk has judged the Tennessee Walking Horse National Celebration twice (earning \$16,000.00 each time). Mr. Sisk has raised and sold a “Big Lick” Tennessee Walking Horse for \$125,000.00. Mr. Sisk spoke publicly at the USDA (United States Department of Agriculture) public hearing in August 2016, in Murfreesboro, Tennessee, against removal of the “Pads and Chains” from “Big Lick” Tennessee Walking Horses.

25. Mr. Jerry W. Harris, principal in Peahead Productions, Inc. of Tullahoma, Tennessee, makes his living as a “Big Lick” videographer and propagandist. He is a vendor of Dabora, Inc, which is owned by the late Mr. David L. Howard’s family. The late Mr. Howard’s son, Mr. Jeffery Howard is the Publisher of the The Walking Horse Report which features expensive “Big Lick” TWH advertisements (approximately \$1,000.00 per Ad) owned by the company his father founded, Dabora, Inc., of Shelbyville, TN. Mr. Jeffrey Howard is also a Director of the Tennessee Walking Horse National Celebration.

26. Mr. Jerry W. Harris has publicly expressed disapproval of the plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) publication) or his journalistic associates/animal welfare activists taking photos or videos of “Big Lick” Tennessee Walking Horses and putting them on the internet and social media to inform the public of “Big Lick” Animal Cruelty. See Mr. Harris’s Facebook post from the August 2014, Wartrace, Tennessee Horse Show, which is the second page of Exhibit “K” to the Affidavit of Clant M. Seay, attached hereto as **Exhibit “A”**. Mr. Harris especially objects to the plaintiff putting videos of the “Big Lick” Tennessee Walking Horse gait in slow motion and putting the videos on the internet and social media to inform the public. See Harris Deposition pages 17 & 18 which are Exhibit “N” and Exhibit “O” to the Affidavit of Clant M. Seay, attached hereto as **Exhibit “A”**.

27. Plaintiff alleges that Mr. David Sisk, Mr. Jerry W. Harris, Mr. Callaway Dial and Maury County Sheriff Bucky Rowland, and his Deputies, allegedly conspired in an organized effort to deny the plaintiff and his journalistic associates/animal welfare advocates from exercising their First and Fourteenth Amendment constitutional rights to take photos and videos at 2016 Columbia Spring Jubilee Horse Show on June 3, 2016, and post them on the internet and social media.

28. Mr. Calloway Dial was the Ringmaster of the Columbia Spring Jubilee Horse Show on June 3, 2016, and is a member of the Maury County Horsemen's Association which, according to Mr. David Sisk's deposition testimony, voted on and approved the "agreement" to not allow videos to be made by citizens at the Columbia Spring Jubilee Horse Show. As ringmaster, Mr. Calloway Dial stands on the grass while horses are being exhibited at the horse show. Mr. Dial can be seen on the "Undercover" video made by reporter for [www.billygoboy.com](http://www.billygoboy.com) publication outside the show ring on the grass bank overlooking the West End of the show arena conferring with Maury County Deputy Sheriff Coby Bear immediately before the reporter is accosted and threatened by Mr. Jerry W. Harris. See Exhibit "G" to the Affidavit of Clant M. Seay which is attached hereto as **Exhibit "A"**. Mr. Dial's loyalty to the "Big Lick" is evidenced by the "Big Lick" horse displayed on his Facebook page, the first page of Exhibit "K" to the Affidavit of Clant M. Seay, attached hereto as **Exhibit "A"**.

29. Pursuant to U.S.C. § 1983, Plaintiff Clant M. Seay seeks injunctive relief, declaratory relief, nominal damages, and punitive damages in the amount of \$100,000.00 each, respectively, against Defendants: Mr. David Sisk and Mr. Jerry Harris; and other costs and expenses against said Defendants, and Maury County Sheriff Mr. Bucky Rowland, in his official

capacity as Sheriff of Maury County, Tennessee. Defendants Sisk and Harris acted with malice and reckless disregard for the federally protected rights of the Plaintiff.

30. Attached as **Exhibit “A”** is plaintiff’s Affidavit dated May 17, 2017, filed in support of Plaintiff’s Motion For Preliminary Injunction filed on May 17, 2017. The Affidavit includes digital exhibits which evidence claims made in this Amended Complaint. The digital exhibits described herein were manually filed with the Court on May 19, 2017. All exhibits filed with the original Complaint in this matter still stand as evidence, are part of the record, and are incorporated herein by reference.

### **Perpetual Impact on Seay’s Exercise of Constitutional Rights**

31. This continuing intimidation, threatening, depriving and interfering with the plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and that of his journalistic associates/animal welfare activists exercise of First Amendment and Fourteenth Amendment rights is untenable for plaintiff and his journalistic associates/animal welfare activists for them to freely exercise said constitutional rights at future events at the Maury County Park including the Columbia Spring Jubilee Horse Show set for June 1-3, 2017, and other events at the park.

### **Immediate and Lasting Irreparable Harm to Seay**

32. The plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists, are eager to return to the Maury County Park horse show arena at the Columbia Spring Jubilee Horse Show to exercise their First Amendment and Fourteenth Amendment constitutional rights, but the fear of intimidation, threatening, depriving and interference by Sheriff Bucky Rowland and Maury County Deputies, acting at his direction, chills and deters plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists from doing so.

33. The fear of intimidation, threatening and interference by Sheriff Rowland and his Deputies severely restricts and impairs the plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists constitutionally protected exercise of freedom of the press at the public Maury County Park guaranteed by the First and Fourteenth Amendments.

34. The chill on plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists First and Fourteenth Amendment rights at the Maury County Park horse show events constitutes

irreparable harm to plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists.

35. There is no adequate remedy at law for the intimidation, threats, deprivation of and interference with the said constitutional rights of plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists by Maury County Sheriff Bucky Rowland, and his agents and employees.

### **FIRST CAUSE OF ACTION**

#### **Violation of Free Speech Clause and Freedom of the Press**

36. Seay's work as a journalist and freedom of speech is protected under the First Amendment and Fourteenth Amendments to the U. S. Constitution, and the horse show arena where the Columbia Spring Jubilee and other equine related events at the public Maury County Park in Columbia, Tennessee, are held is a traditional public forum.

37. The Defendants' intimidation, threatening and interfering and attempting to deprive plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists videoing at the Columbia Spring Jubilee horse show event at the public Maury County Park violates the Free Speech Clause and Freedom of the Press Clause of the First



Amendment to the United States Constitution, made applicable to the States through the Fourteenth Amendment.

**WHEREFORE**, Seay respectfully prays the Court grant the equitable and legal relief set forth in the prayer for relief.

## **SECOND CAUSE OF ACTION**

### **Violation of Due Process Clause**

38. Defendants' intimidation, threatening, depriving and interfering with plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists, in their exercise of constitutional rights guaranteed by the First Amendment violated the Due Process Clause of the Fourteenth Amendment to the United States Constitution.

**WHEREFORE**, the plaintiff respectfully prays the Court grant the equitable and legal relief set forth hereinafter in the prayer for relief.

## **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully prays for relief in that this Court:

A. Assume jurisdiction over this action;

B. Enter a judgment and decree declaring the actions taken by the Defendants in intimidating, threatening and interfering with and attempting to deprive plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his

journalist associates/animal welfare activists, from taking videos of the events and happenings at Columbia Spring Jubilee Horse Show at the public Maury County Park violated plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists constitutional rights, especially, his right to freedom of the press, and his and their right to freedom of speech and due process;

C. Enter a judgment and decree declaring that the Defendants' intimidating, threatening, interfering with and attempting to deprive plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists (to take videos and exercise freedom of the press) at the Columbia Spring Jubilee Horse Show at the public Maury County Park, is unconstitutional on its face and as applied to plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists exercise of freedom of the press and exercise of free speech because it violates plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) website) and his journalist associates/animal welfare activists rights as guaranteed under the First and Fourteenth Amendments to the United States Constitution;

D. Enter a preliminary and permanent injunction enjoining Defendants, their agents, officials, servants, employees, and all persons in active concert or participation with them, or any of them, from applying Defendants' policy

and practice of intimidating, threatening or interfering with, or threatening to deprive the constitutionally guaranteed rights of citizens and the press in public parks during public events that are open to the public;

E. Adjudge, decree, and declare the rights and other legal relations with the subject matter here in controversy, in order that such declaration shall have the force and effect of final judgment;

F. Award Plaintiff nominal damages arising from the acts of the Defendants as an important vindication of his constitutional rights;

G. Request for the award of punitive damages of \$100,000.00 against Mr. David Sisk, and \$100,000.00 against Mr. Jerry W. Harris, for their malicious, intentionally reckless and outrageous scheming, colluding and conspiring and scheming as state actors, along with Maury County Sheriff Bucky Rowland, and his Deputies, to injure, oppress, threaten, and intimidate the plaintiff (publisher of [www.billygoboy.com](http://www.billygoboy.com) publication) and his journalist associates/animal welfare activists from being able to freely exercise their First Amendment and Fourteenth Amendment constitutional rights to take videos and photos at the Columbia Spring Jubilee Horse Show in Maury County Park on June 3, 2016, for the purpose of putting them on the internet and social media in inform the public and for the world to see

the “Big Lick” Animal Cruelty to Tennessee Walking Horses. (See also criminal statute: “18 U. S. Code Sec. 241 – Conspiracy Against Rights”)

H. Award Plaintiff his costs and expenses of this action, including reasonable attorneys’ fees, in accordance with 42 U.S.C. § 1988 and other applicable law; and

I. Grant such other and further relief as appears to this Court to be equitable and just.

Respectfully submitted,

/s/ Clant M. Seay

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### **VERIFICATION OF COMPLAINT**

I, Clant M. Seay, a citizen of America and a resident of Oxford, Mississippi, hereby declare that I have read the foregoing First Amended Verified Complaint and the factual allegations therein, and the facts alleged therein are true and correct.

/s/ Clant M. Seay  
Clant M. Seay

## **CERTIFICATE OF SERVICE**

I, Clant M. Seay, Plaintiff, do hereby certify that a true and correct copy of the foregoing First Amended Verified Complaint was served to Consenting Users through the U. S. District Court's ECF System, and to all Non-Consenting Users via electronic transmission to their respective email addresses, and by the United States Mail, first-class postage prepaid, to the addresses set forth below as applicable, on this 26<sup>th</sup> day of June, 2017.

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*Attorney for Defendant Bucky Rowland*

/s/ Clant M. Seay  
**CLANT M. SEAY**