

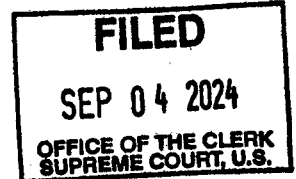
ORIGINAL

IN THE SUPREME COURT OF THE UNITED STATES OF
AMERICA

24-0703

Jonetta L. Grieme, ProSe

Petitioner



V.

Shawn Collie

Buchanan County Drug Strike Force,
Mike Strong, Buchanan County Sheriff's Department

Respondents

Defence Council, David Baker

+

ON PETITION FOR WRIT OF CERTIORARI
TO THE
UNITED STATE COURT OF APPEALS
FOR THE EIGHTH CIRCUIT COURT OF APPEALS

Jonetta L. Grieme, Pro Se
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Petitioner

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Respondents council

Questions To Consider

1. Was the petitioner, Jonetta Grieme's Seventh Amendment to the United States Constitution violated by the Missouri federal courts?
2. Did the Western District Courts err in granting summary judgment to the defendant Shawn Collie after he was caught knowingly lying to the internal affairs detective?
3. Did the Western District Courts Of Missouri Err in granting the defendant Shawn Collie summary judgement after petitioner informed the courts that Shawn Collie was tampering with petitioner's witness?
4. Did Jonetta provide the Western District Court Of Missouri with enough material facts to be granted a jury trial?
(A-17)
5. Would surveillance of the officer, Shawn Collie going into the petitioner, Jonetta Grieme's cell demanding audio tapes from her that she recorded of the defendant Shawn Collie be worth granting the Petitioner's Motion to Compel surveillance and help the courts to justly rule on this claim?
6. Did the Missouri Courts err in not enforcing Jonettas subpoenas for her booking desk and arrest records when petitioner Grieme asked the courts to Compel them?
7. Did the Western District Court of Missouri err in not considering all the evidence that Jonetta Grieme provided them with before granting summary judgement?
8. Does "DURESS and COERCION" toll the statute of limitations?
(American Jurisprudence vol. 34. Pp. 193, 194; "Doctrine of Duress and Undue influence")

9. Did Shawn Collie's actions towards Jonetta Grieme cause the petitioner to believe if she didn't quit telling on him for his sexual misconduct that her freedom, life and safety would be jeopardized?
10. Was there enough evidence presented to the Missouri Courts to prove Shawn Collie was targeting Jonetta Grieme? (A-2 (a); A-2 (b); A-5; A-6; A-8)
11. Was there enough evidence presented to the Missouri Courts to prove Shawn was acting "UNDER COLOR OF LAW" and intimidating Jonetta Grieme?
12. Should the Missouri Courts consider the "Doctrine of Duress and Coercion" after the defendant Shawn Collie was caught knowingly lying and placing the petitioner in restraints?
13. Is tampering with a witness a form of Duress and Coercion" (A-4 pg. 7-41)
14. Did Shawn Collie have a duty as a federal officer to disclose the facts to the Internal Affairs detective? (United States v. Irwin, 654 F.2d 671)?
15. Did the Western District Court of Missouri err by not considering the "Doctrine of Fraudulent Concealment" when the defendant knowingly lied and refused to produce the petitioners booking desk and arrest records?
16. Did the Missouri courts err by not considering the "Doctrine of Fraudulent Concealment" after Shawn Collie was caught knowingly lying about having any encounters with the petitioner Jonetta Grieme?
17. Did Jonetta have proper representation and a fair trial as a Pro Se litigant in this case?
18. Is lying to a detective a form of Fraudulent Concealment? (18 U.S.C. § 1001)

(ii)

19. Does fraudulent concealment of material facts toll the statute of limitations in America? (**RSMo Section 516.280; " Doctrine of Fraudulent Concealment "**)
20. Is Jonetta's claims time barred given the fact of evidence that proves " Duress, Coercion and fraudulent concealment" was happening ever since Jonetta reported Shawn Collie to Mike Strong?
21. Should judgment be overturned in the plaintiff Jonetta Griemes' favor?
22. Did Jonetta Grieme produce enough medical documentation to the Western District Courts proving her PTSD and disability started not long after Shawn Collie drove her to a secluded area and tossed an evidence bagging into her lap containing drugs, exposed his penis to her then brought a S.W.A.T team into her home why her mother was at work? (**A-9**)
23. Did Jonetta Grieme provide a Neurology medical report proving she began to have trouble with her short term memory in 2016? (**A-9 pg. 1-7**) "DATE OF DISCOVERY"
24. Did Jonetta Grieme provide the medical documentation showing her PTSD diagnosis changed in 2016 to **Chronic PTSD**? (**A-9 pg. 25**)
25. Does the " Date of Discovery" toll the statute of limitations?
26. Did the Eighth Circuit Court Of Appeals Court err in saying Mrs. Grieme's complaints were time barred given the fact that fraudulent concealment, duress and coercion was happening ever since she reported Shawn Collie's sexual misconduct?
27. Was it BIAS of the Eighth Circuit Court of Appeals to tell petitioner Grieme that they don't accept petitions for reconsideration for a rehearing of En Banc and then mailed her petition back to her? (**A-11 pg. 17 & 19**)

28. Was the Missouri federal courts being biased because Shawn Collie is a federal officer?
29. Was it **negligent** for Mike Strong to ignore Jonetta's complaints about Shawn Collie's sexual misconduct towards Jonetta?
30. Was it **negligent** of Mike Strong to ignore the fact that Shawn Collie was targeting, harassing and placing Mrs. Grieme in handcuffs and jail cells after she reported his sexual misconduct?
31. Was it **negligent** of the Buchanan County Drug Strike Force Department, the Buchanan County Sheriff's Department and the local Internal Affairs Department to allow Shawn Collie to stay employed after he was caught knowingly lying to the detectives? **(A-2 (a))**
32. Was it negligent of the departments to allow Shawn Collie to keep his badge knowing he lied **and knowing that I was not his only victim?** **(A-2 (a); A-2 (b); A-4; A-5; A-6; A-8; A-12)**
33. Has Jonetta Grieme produced enough Evidence to prove that Mike Strong, Buchanan County Drug Strike Force, Buchanan County Sheriff's office and the Buchanan County Internal Affairs Department were all **NEGLIGENT** in responding to not only her complaint but the other girls complaints as well?
34. Did the Western District Court of Missouri err in granting Shawn Collie immunity in a sexual assault case?
35. Did the Western District Courts err in not considering Fraudulent Concealment after a local attorney told the petitioner Jonetta that he misplaced audio tapes of the officer Shawn Collie that the petitioner provided the attorney John Warren with.
36. Does lying create a dispute?

PARTIES TO THE PROCEEDING

Jonetta L. Grieme ProSe
Petitioner

V.

Buchanan County Drug Strike Force, Shawn Collie,
Buchanan County Sheriff's Department, Mike Strong,
Respondents

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First filed in the **Western District Court Of Missouri in 2020 5:20-cv-06183**
The Honorable Judge Stephen R. Bough
Filed on December 14, 2020 – Dismissed on January 22, 2021

Refiled on November 1, 2021 in the
Western District Court of Missouri 5:21-cv-06144
Judge Brian C. Wimes

A Clerks Judgement, Tracy Diefenbach (clerk) granting summary judgement on
July 26, 2023. Petitioner Grieme filed her notice of Appeal August 7, 2023

Appealed to The **Eighth Circuit Court of Appeals USCA 23-2813**
Judgement signed on March 14, 2024 and a order was signed on May 3, 2024
denying petitioner's reconsideration for a en banc hearing Judge Loken, Judge
Benton and Judge Erickson

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In the Supreme Court of the United States Of America

Jonetta L. Grieme
Petitioner

V.

Shawn Collie, Buchanan County Drug Strike Force,
Mike Strong, Buchanan County Sheriff's Department
Respondents

PETITION FOR A WRIT CERTIORARI

COME NOW, Petitioner Jonetta Grieme requests that the Supreme Court Of The United States issue a Writ of Certiorari to reverse, and remand the decisions of the Eighth Circuit Court Of Appeals for the following reasons.

- I. The lower courts have erred in the opinions below
- II. The lower courts have expressed conflicting views. Western District Court Of Missouri ruled on claims that I didn't even file. The Eighth Circuit Court Of Appeals only said my claims were time barred despite the evidence of Duress, Corcison and the evidence of fraudulent concealment .
- III. This issue is of great legal / national significance

OPINIONS BELOW

This case was first filed on December 14, 2020 in the Western District Court Of Missouri. (Grieme v. Collie et al - 5:20-cv-06183) On January 22, 2021 the Honorable Stephen R. Bough dismissed the claim without prejudice because I was ordered to file an Amended Complaint and failed to do so because at that time I didn't know what an Amended Complaint was. (A-1 (a))

Petitioner Jonetta L. Grieme refiled this case on November 1, 2021 in the Western District Court. (Grieme v Collie et al - 5:21-cv-06144) The case was assigned to the Judge Brian C. Wimes. The defense council took advantage of the fact I was a pro se litigant and stonewalled me during discovery. The defense council refused to provide me with any of my records and documents that I requested and had subpoenaed. This resulted in an unfair trial for me, the petitioner. (A-11 pg. 1-10) Defendants filed a Motion for summary judgment with the Western District Court Of Missouri and they were granted summary judgment on July 26, 2023 in a Clerks Judgement despite the evidence and the fact the defendant Shawn Collie was caught knowingly lying to the Internal Affairs detective. (A-1 (b) & (c); A-2 (a) & (b)). The defendants wrote a false statement in their Motion for Summary Judgement and I pointed that out in my Opposition to their Motion (18 USC sec. 1001) and the same false statement was written in the Courts Order as well (A-14 pg. 14) Despite My demand for a jury trial the Western District Court granted Summary Judgement in favor of Defendant Collie on Plaintiff's claim for retaliation, however I never filed a retaliation claim on Shawn Collie, I filed a harassment claim (A-1 (c) pg. 5). " The Plaintiff Jonetta has proved that she was being harassed by Shawn Collie with the

witness statements, Shawn Collies Internal Affairs transcripts of him lying about ever having an encounter with her and through her arrest records with his name all over them.” The court also granted Summary judgment in favor of the Defendant Mike Strong on Plaintiff’s claim for failure to supervise, However I never filed a claim for failure to supervise, I filed a negligence claim). The Western District Court of Missouri also said that Shawn Collie has immunity in this sexual assault complaint.

“Summary Judgment should have never been granted in the favor of the defendants because there is proof Shawn Collie knowingly lied and lying creates a dispute.” (A-2 (a) ; A-2 (b) pg.2, pg.6, pg. 14 & pg. 16; A-5 & A-6.)

The Petitioner, Jonetta Grieme filed a timely appeal with the Eighth Circuit Court Of Appeals in St. Louis Missouri on August 9, 2023. Grieme v. Collie et al - 23-2813) The Eighth Circuit Court of Appeals said that my claims were time barred despite the evidence of Duress and Coercion (A-2 (b)) the evidence that proves Shawn Collie knowingly lied to investigators (A-2 (a) Transcripts of the Internal Affairs Interview with Shawn Collie; (A-2 (b); A-5; & A-6). Fraudulent concealment of material facts (A-2 (a), A-2 (b) pg. 18 & 19; A-3 pg. 18-19; A-7; A-11), the date-of-discovery (2016) of the injury to her short term memory (A-9 pg. 1-7) her PTSD diagnosis changed in 2016 to Chronic PTSD (A-9 pg. 25), and the evidence proving I am not his only victim (A-4; A-8 pg. 3, 4, & 12; A-12). Please see the Private Investigators deposition transcripts. (A-12 pg. 6, 7, 14 & 15) An order was signed on April 16, 2024 denying rehearing (A-1 (e)). The last filings on this case was in the Eighth Circuit Court Of Appeals on May 02, 2024 when my reconsideration for a En Banc hearing was denied. (A-1 (f); A-11 pg. 6 & 20)

Jurisdiction

The order was entered on March 14, 2024 (A-1 (d)) in the Eighth Circuit Court of Appeals. The last filings in the Eighth Circuit Court Of Appeals was on May 03, 2024 (A-1 (f)). I was granted an extinction to file my Writ of Certiorari and I filed my first attempt on September 13, 2024. **The United States Supreme Court has jurisdiction to review this case according to 28 USC sec. 1254.**

CONSTITUTIONAL AND STATUTORY PROVISIONS

- “Seventh Amendment” - “Right to a jury trial in Civil cases”
- “Doctrine of Duress and UnDue Influence”
- “Coercion” RSMo 566.200 (4) (a) (b) (c)

- “Fraudulent concealment” RSMo 516.280 (1968) This section is statutory authority for the proposition that fraudulent concealment of a cause of action is an improper act which, if established, will toll the running of limitations under section RSMo 516.140, Smile v. Lawson (Mo.) Supreme Court of Missouri 435 S.W.2d 325; Kauchick v. Williams Supreme Court of Missouri (Mo.), 435 S.W.2d 342.
- “Doctrine of Fraudulent Concealment”
- 18 USC sec. 1001 “Fraudulent Concealment” (Shawn Collie lying is a form of Fraudulent Concealment)
- “Date Of Discovery” RSMo 516.120
- 18 USC sec. 1512 (c)(1); (RSMo 575.270) “Tampering with a witness, victim, or an informant”
- 18 USC sec. 241 (1737) - “Conspiracy against rights”
- 18 USC sec. 242 - “Under Color Of Law”
- 42 USC sec. 1983 - “Civil action for deprivation of rights”
- 34 USC sec. 12601 - “Cause of action”

- **“Negligence”**
- **Fourth Amendment** - “Illegal search and illegal arrest”
- **Fifth Amendment** - “Due Process”
- **“Fourteenth Amendment”** - “nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.”
- **“Harassment” RSMo 565.090**
 (1.) A person commits the offense of harassment in the first degree if he or she, without good cause, engages in any act with the purpose to cause emotional distress to another person, and such act does cause such person to suffer emotional distress.
- **“Targeting” RSMo 565.225**
- **“Stalking” RSMo 565.227**
- **“Sexual Misconduct” - RSMo 566.093** (1) exposing one's genitals with the knowledge that doing so is likely to shock, offend or alarm
- **18 USC sec 3771 “Crime Victims Rights Act” SB129**
- **34 USC sec 20141 “Victims Right and Restitution Act”**
- **RSMo 1 section 15 (Unreasonable search and seizures)**

STATEMENT OF THE CASE

This is a Civil Rights, personal injury and Negligence suite. Jonetta Grieme filed this case under (18 USC sec. 241(1737)) making it unlawful for two or more persons to agree to injure, threaten, or intimidate a person in the United States. (18 USC sec. 242, 241) This provision makes it a crime for someone acting "under color of law" to willfully deprive a person of a right or privilege protected by the Constitution or laws of the United States. (42 USC sec. 1983); SECTION 1983 Provides an individual the right to sue state government employees and others acting "under color of law" for civil rights violations. (34 USC sec. 12601; Negligence)

The Appellant, Jonetta Grieme's **Fourth Amendment, Fifth Amendment and Fourteenth Amendments** were violated. The Appellant was sexually assaulted, harassed, intimidated and threatened by Law Enforcement acting "Under Color of Law."

My life was not easy growing up and their actions affected my mental health significantly. Their actions also affected my development and growth from a teenage girl into a woman. These powerful men targeted me so I would quit telling on Shawn Collie for offering me drugs for oral sex and exposing his penis to me. To hear the Appeals Court say my claim is time barred really upsets me because I did try doing something then and he started targeting me so when I turned 18 I gave audio recordings to a local St. Joseph, MO attorney by the name of John Warren and he told me and my ex mother-in-law he misplaced the tapes. (Fraudulent Concealment RSMo 516.280; 18 USC sec.1001) Shawn kept targeting me for years after his

sexual misconduct towards me. (DURESS/COERCION) I learned that if I didn't quit telling on him he would continue to follow, harass, target, intimidate and arrest me and I feared he would try and plant something on me or in my house or in my car. I feared for my life, my safety, my freedom, my family and my future and that is why I do not agree with the opinions of the lower court. (A-2 (b); A-4 pg. 13-16 & A-4 pg. 20-26) I believe they are being biased and I even had the Eighth Circuit Court Of Appeals mail me back my petition for reconsideration of an En Banc hearing and tell me they don't accept reconsideration Petitions. (A-11 pg. 6; A-11 pg. 17) So I re-mailed it back to the Eighth Circuit Court Of Appeals and showed the rule stating I could ask the Judge to reconsider and then they allowed me to file it. (A-11 pg. 6 & 19) "I didn't know what else to do after that attorney said he misplaced the tapes and I didn't have Google at my figure tips then. (A-7) Just since filing this complaint there is proof people have been messing with my mail." (A-13 pg. 2 & 3 are pg. 3 and 43 of Jonetta's Appellate Brief 23-2813.) (Victoria Valentino v. Bill Cosby - 23SMCV02599) They have tolled the statute of limitations in the Valentino v. Cosby, My abuser had a gun, a badge and other victims and he was caught knowingly lying to the detective and that is fraudulent concealment and fraudulent concealment tolls the statute of limitations. It is also Negligence for the departments to keep him employed after he was caught knowingly lying to the detective and he has other victims who have reported him as well.. (A-4; A-8 pg.12; A-12)

**REASONS WHY I BELIEVE MY WRIT OF CERTIORARI SHOULD BE
GRANTED AND THE STATUTE OF LIMITATIONS SHOULD BE
TOLLED**

1. DURESS (COERCION) “Doctrine of Duress and undue influence”

Between Shawn Collie lying to Internal Affairs (A-2 (a)) and the proof he lied in (A-2 (b); A-5 & A-6) and the proof he kept targeting me the statute of limitations should be Tolloed under the “DOCTRINE of Estoppel by Duress and Undue Influence”

U.S. District Judge of Eastern Pennsylvania Harold Kenneth Wood stated in Copper v. fidelity-phila. Trust co.,

“There is little authority for the proposition that “DURESS” tolls the running of the statute of limitations. It is stated in AMERICAN JURISPRUDENCE, Vol 34, Pp. 193, 194; “Doctrine of duress and undue influence” In Chatfield v. City of Seattle (Washington Supreme Court) The court held that “Duress” in order to toll the statute of limitations, must be threatened unlawful actions

“AND I WAS THREATENED WITH UNLAWFUL ACTIONS”

- A. **Tampering, Harassing, Targeting, Threatening and Intimidating the Victim RSMo 565.090** There was enough evidence presented to the court to prove that Shawn Collie harassed, targeted and intimidated Mrs. Grieme (**Tampering RSMo 575.270**). What kind of person has that many encounters with the same law enforcement officer in a 5 yr period? I was a little girl, just a teenager and he was targeting me

and intimidating me and I was in fear of my life, freedom and safety.
If you think about it, every encounter I had with Shawn Collie I was
with different people so that shows that I was Shawn Collie's target.
(Stalking RSMo 565.223) (A-2 (b); A-4; A-5; A-6)

B. "Duress" describes the act of using force, coercion, threats, or
"psychological pressure," among other things, to get someone to act
against their wishes. (or to keep them from acting in a certain way or to
keep me from telling on him anymore)

566.200 "Coercion" (4) (a)(b)(c);

(4) "Coercion":

- (a) Threats of serious harm to or physical restraint against any person;
- (b) Any scheme, plan, or pattern intended to cause a person to believe
that failure to perform an act would result in serious harm to or physical
restraint against any person; or
- (c) The abuse or threatened abuse of the legal process;

"I have suffered recurring Intentional infliction of emotional distress by Shawn
Collie and the Negligence of Mike Strong , the Buchanan County Drug Strike Force
department and Buchanan County Sheriff's department."

2. Date of Discovery

In Missouri, the statute of limitations for filing a personal injury claim is 5 years (Missouri Code section 516.120). This means that claims must be filed within 5 years of discovering the injury.

- A. The petitioner did not discover the injury to her short term memory was linked to her PTSD and Anxiety until 2016. (A-9 pg. 1-10) this complaint was first filed in 2020 then refiled in 2021
- B. The petitioner's diagnosis went from P.T.S.D. to Chronic P.T.S.D in 2016. (A-9 pg. 25)
- C. The petitioner Jonetta Grieme did not discover that Shawn Collie was lying until 2022 or 2023

“ My injury is not only from the fear and shock of Shawn Collie driving me to a secluded area, tossing an evidence baggy containing drugs in my lap and exposing his penis to me, my injury also arises from him targeting me afterwards, pointing guns at me, screaming and causing alarm and fear in me when I wasn't expecting it and placing me in restraints and being slammed to the ground in sleet and snow. In Shawn Collie's attempt to cover up his sexual misconduct towards me, Shawn Collie committed several more crimes and caused injury to me. Then Shawn lied to the investigators and said he has never had an encounter with me. (A-2 (a)) Shawn Collie lied because he knew what he was doing to me was wrong and against the law”

3. Fraudulently Concealing Material Facts (18 USC sec.1001); (A-2 (a); A-2 (b); A-3 pg. 18 - 19; A-11)

– an affirmative duty to disclose is imposed, and mere silence by the party under that duty constitutes fraudulent concealment. Glad v. Gunderson, Farrar, Aldrich & DeMersseman, 378 N.W.2d 680, 682-83 (S.D.1985). The silence must concern defects which the party with the duty to disclose knew or should have known. Holy Cross Parish v. Huether, 308 N.W.2d 575, 577 (S.D.1981).

(A-2 (a); A-2 (b); A-3 pg. 18; A-5; A-6; A-11 pg.1-5 & pg. 7-14) “MO SUNSHINE LAW” Section 610.010

False statement under 18 USC sec. 1001 requires that the false statement, concealment or cover up be “knowingly and willfully” done, which means that “The statement must have been made with the intent to deceive, a design to induce belief in the falsity or to mislead.” (A-2 (a))

18 U.S.C sec. 1512 (c) (1) conceals a record or document with intent to impair the availability for use in an official proceeding (d) whoever intentionally harasses another person and thereby hinders, delays, prevents, or dissuades any person from- (2) reporting to a law enforcement officer or judge of the United States the commission or possible commission of a Federal offense or a violation of conditions of probation’ supervision release, ‘parole, or release pending judicial proceedings; U.S.C 18 sec. 1512 (1729)

(A-2 (a); A-3 pg. 18-19; A-11 pg. 1-5 & 7-14)

A. **The defendants have fraudulently concealed material facts / documents / surveillance and lied. They would not provide me with my own arrest reports or surveillance footage from the county jail when Shawn came to my holding cell demanding audio tapes I had of him along with other documents (18 USC sec. 1001) (A-2 (a); A-3 pg. 18-19; A-11 pg. 1-5 & 7-14; A-5; A-6) “MO SUNSHINE LAW” RSMo 610.010)**

The Texas Court of Appeals in the Nichols v. Smith held that where a plaintiff produced prima facie evidence of fraudulent concealment, the statute of limitations will be tolled .

§42.9 Fraudulent Concealment Exception to Statute of Limitations

The Case: Doe v. Catholic Bishop for the Diocese of Memphis, No. W2007-01575-COA-R9-CV, 2008 WL 4253628 (Tenn. Ct. App. Sept. 16, 2008), *perm. appeal denied*, (Mar. 16, 2009).

—“A close cousin of the discovery rule is the ‘well accepted principle of fraudulent concealment.’” Mark K. v. Roman Catholic Archbishop of L. A., 79 Cal. Rptr. 2d 73, 78 (Cal. Ct. App. 1998) (quoting Bernson v. Brown, 873 P.2d 613 (Cal. 1994)).

The Tennessee Supreme Court has set forth the elements of **fraudulent concealment**: To establish fraudulent concealment, a plaintiff must prove (1) that the defendant took affirmative action to conceal the cause of action or remained silent and failed to disclose material facts despite a duty to do so and

(2) the plaintiff could not have discovered the cause of action despite exercising reasonable care and diligence.

(3) The third essential element of fraudulent concealment is knowledge on the part of the defendant of facts giving rise to the cause of action. In other words, the defendant must be aware of the wrong.

(4) The fourth and final essential element of fraudulent concealment is a concealment of material information from the plaintiff.

(A-2 (a); A-3 pg. 18 & 19; A-11 pg. 1-4 & 7-14)

Shadrick v. Coker, 963 S.W.2d 726, 735 (Tenn. 1998) (citations omitted).

If a fiduciary relationship exists between the plaintiff and defendant, the party asserting fraudulent concealment need not show affirmative concealment of the cause of action, because failure to speak where there is a duty to speak is the equivalent of some positive act or artifice planned to prevent inquiry or escape investigation. ' *Id.*

(quoting Hall v. De Saussure, 297 S.W.2d 81, 85 (Tenn. Ct. App. 1956)).

2008 WL 4253628 at *6.

“Shawn Collie Lied.” (A-2 (a); A-2 (b); A-5; A-6) “As a federal officer he had a duty to be honest during a federal investigation.”

“I didn't know Shawn Collie would lie about having any encounters with me and I didnt know they would conceal documents, arrest reports, phone records and surveillance ”

"Shawn Collie is very aware of his wrong doings and that is the reason why he lied because he knew what he did to me was wrong and against the law. He knew he was acting UNDER COLOR OF LAW and he knew he was violating my United States Constitutional Rights."

"Doctrine of fraudulent concealment"

1. The defendants refused to produce my arrest records
(A-11 pg. 1-4 & 7-14)
2. The defendants refused to produce my booking desk records (A-11; A-3 pg. 18-19) The City Mayor's office made a phone call to get my booking desk records and they never produced my arrest report from 7-8-1998 when Shawn Collie arrested me for no reason but to have me transported to jail and be stripped searched (A-2 (b) pg. 2)
3. The defendants refused to produce surveillance footage from the jail from when Shawn Collie came to my holding cell, demanding I give him the audio tapes of him if he released me from jail. (COERCION 566.200 (4) (a)(b)(c)) (A-2 (b) pg. 14 & 16)
4. A local attorney John Warren told me he misplaced the audio tapes I provided him of Shawn Collie; John Warren was unwilling to provide me with a statement. (There are two witnesses to him saying he misplaced the tapes, Harold Frazer and his mother Kim Frazer)
(A-7)

5. Shawn Collie lied to the investigators, summary judgement should have never been granted with all the evidence I presented and with him knowingly lying to the investigators. I should have been granted a jury trial, that is my Seventh Amendment Right. (A-2 (a); A-2 (b) pg. 14 & 16; A-3 pg. 18 & 19; A-11 pg. 1-4 & 7-14)

Fraudulent Concealment RSMo 516.280 STATES: (1968) This section is statutory authority for the proposition that fraudulent concealment of a cause of action is an improper act which, if established, will toll the running of limitations under section RSMo 516.140, Smile v. Lawson (Mo.), 435 S.W.2d 325; Kauchick v. Williams (Mo.), 435 S.W.2d 342.)

4. Seventh Amendment (RULE 38)

Amendment Seven to the Constitution protects the right for citizens to have a jury trial in federal courts with civil cases where the claim exceeds a certain dollar value

Shawn Collie targeted me to show his power over me and to intimidate me (A-2 (b); A-5; A-6 & A-3)The defendant Shawn Collie placed me in restaurants, Shawn placed me in a jail cell 3 times, Shawn made me believe if I didn't quit telling on him that my life, freedom, family and safety would be at jeopardy. Shawn knowingly lied to the investigator about ever having an encounter with me and that should have tolled the statute of limitations. When I turned 18 I gave copies of the audio tapes I had of him to a local St. Joseph, MO attorney John Warren and the attorney told me he misplaced the tapes. (Witnesses to this is Harold Frazer, Kim Frazer)

I did find the attorney's wife on facebook. (A-7) I'm not Shawns only victim either. (A-4; A-8 pg. 12 and the Private

investigators deposition A-12), I also notified the federal Judge, Brian Wimes in the Western District Court of Missouri about Shawn Collie tampering with my witness Chiro Richey as soon as I announced to the courts and to the defence lawyer that she was going to be testifying. Shawn Collie was also trying to bribe her by telling her that he would see about trying to get her moved closer to St. Joseph, MO trying to get her not to testify. (A-4 pg. 7 - 45)

AND

Chiro Richey also expresses how scared Shawn Collie was making her in A-4 on pg. 19, 20, 24, 26 & 33; The Private Investigator also states how Shawn Collie has been scaring people for years on pg. 1 of A-8. 18 USC 1512 (c)(1);

“And that is why I believe the statute of limitations should be tolled.”

On June 2, 2023 Nevada's Senator Lisa Krasner sponsored the “Justice for Victims Crime bill (NVSBI29)” which abolishes the civil statute of limitation for sexual assault survivors. 18 USC sec. 3771 (NVSBI29) “Victims Right and Restitution Act” 34 USC sec 20141. Governor Joe Lombardo states, “with the passage of time people tend to forget the victim, but the victim never forgets.”

I understand Nevada isn't Missouri but I do deserve to be heard by a Jury. (Seventh Amendment of The United States Constitution)

A Summary of What Happened and how I first met Shawn Collie

In 1997 the Plaintiff Jonetta Grieme was asked to take a pair of shoes to the county jail for her childhood boyfriend Harold Frazer. He had his friend's wife bring me shoes to drop off to him. When I took the shoes to the jail, the jailer discovered they had marijuana in them. The Jail could see that these boys used me to deliver the shoes because I was only 17yrs old. They did not press charges on me and the jailor told me that before they released me that they wanted me to speak to a couple of guys. One of those guys was Shawn Collie. (This is how I first met Shawn Collie, this is the first encounter that I had with officer Shawn Collie)

After they released me from jail, a week or so later my Mom told me that a detective, Shawn Collie had called and wanted me to call him back.

I returned Shawn Collie's phone call and he told me he needed to ask me some more questions and it was important that I cooperate because they had up to 5yrs to press charges on me and said I could go to prison for a long time and lose my baby if I didn't corporate. I agreed to meet with Shawn and answer some more questions. Shawn and another gentleman met with me. (this was my second encounter with Shawn Collie)

Shawn Collie called my house again. My ex-boyfriend Harold Frazer had his mother (Kim Frazer) take me to Radio Shack in St. Joseph, MO and she purchased a recorder with a suction cup that attached to the phone along with some tapes so I could record Shawn Collie when he called.

Shawn again called me at my residence and said he needed to meet with me again to ask me some more questions. (RSMo 565.090 Harassment) He reminded me that it was important that I cooperate, reminding me that they could still press charges on me, and said I could lose my baby and go to prison for a long time "DURESS/COERCION". I agreed to speak with him again. This time Shawn was alone and driving a grayish blue Jeep Cherokee. I got in the jeep thinking we were going back to the department to talk but Shawn drove me to an alleyway next to a brick warehouse and parked. (A-3 pg. 3 & 4) I got scared and was nervous and unsure as to what he was doing, then Shawn reached into the backseat of his jeep and grabbed an evidence baggy containing 4 glass vials with a white substance in it and tossed it onto my lap and said, "if you want drugs, I got drugs" Instantly I put my hands up and started to get really scared because I didn't know what was going on and I thought he was setting me up. When I looked over at Shawn Collie, Shawn had his penis out of his pants wanting me to perform oral sex on him for the drugs.

I repeated several times, to take the bag off of my lap. I was too afraid to remove the bag myself because I didn't want my fingerprints on the bag. Shawn removed the bag off my lap and put his penis back in his pants and I told Shawn to take me home. I was so scared and shocked. I had only seen movies about bad cops and growing up I was always taught that if someone was hurting me or if I was in danger that I'm supposed to tell the cops, but it was a cop who was doing this to me. I was shocked and scared and didn't know what to do. (This was my third encounter with Shawn Collie) Shawn Collie lied to the internal affairs investigator and said he never had an encounter with me. (A-2 (a)) I was 17 when this happened.

“Law enforcement officers who engage in non-consensual sexual contact with persons in their custody deprive those persons of liberty without due process of law, which includes the right to bodily integrity.” Fourteenth Amendment.

“ Whoever, Under Color of Law.... willfully subjects any person “(or a teenage girl)” to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States [shall be guilty of a crime].”

Shawn Collie Should not have been allowed immunity. The defendants tried to use immunity as a defense in a sexual assault case. He literally tossed drugs in my lap and showed me his penis.

“ You Don’t Get Immunity For That, That Is Not Why Immunity Was Designed, Immunity Is Not An Ok For Government Actors To Use Their Badges And Authority To Act “UNDER COLOR OF LAW” And Offer Drugs To Young Girls And Ask Teenagers For Blow Jobs. That’s Not Why Immunity Was Designed”

“ Qualified immunity is different, on one hand it covers a vast array of actions, from split-second judgment calls to carefully crafted decisions. See: Goffin v. Ashcraft, 977 F.3d 687, 691 (8th circuit) In other ways, it is narrower: government actors only benefit from qualified immunity if their actions did not violate a clearly established right. See: McManemy v. Tierney 990 F.3d 1034, 1038 (8th circuit) As the Supreme Court has put it, “the rights contours [must have been] sufficiently definite that any reasonable official in the defendants shoes would have understood that he was violating it. Kisela v. Hughes, -U.S.-, 138 s. Ct. 1148

“ Shawn knew he was violating my rights and breaking the law; that is why he lied to the detective ”

In the Court of Appeals (7th circuit) Hess v. Garcia and Doughty 3:21-CV-00101-JD-MGG: The Honorable Judge Jon E. DeGuilo states, " It is well established that sexual assault by a government official acting Under Color of Law violates the Constitution. Cases from different circuits have agreed on that the bottom line, holding that sexual assault can violate the Fourteenth Amendment Equal Protection Clause as sex discrimination, the Fourth Amendment "right of the people to be secure in their persons," and the right to bodily integrity protected by the Fourth Amendment " Due Process Clause." He goes on to state; "sexual assault is an intentional act that never serves a legitimate governmental purpose."

Shawn continued to call me at my house and I started recording the phone conversations.

(RSMo 565.090 Harassment, first degree, penalty. — 1. A person commits the offense of harassment in the first degree if he or she, without good cause, engages in any act with the purpose to cause emotional distress to another person, and such act does cause such person to suffer emotional distress.) Like following me, pointing guns at me and screaming at me. Patrolling around my house, putting me into jail cells and having me stripped searched. I started seeing a psychiatrist shortly after Shawn exposed his penis to me and tossed drugs on my lap then brought a SWAT team into my mothers house with guns pulled. (A-9 pg. 12-15; A-5 pg. 1-5 & 23)

I wrote letters and made phone calls to the Buchanan county Drug Strikeforce and the Buchanan county Sheriff's office. This only made it harder on me. (They never had Internal Affairs come and take my statement. RSMo 210.115)

No one did anything to Shawn Collie for his sexual misconduct and for him putting drugs in my lap.

I had a childhood friend Heather Church pull up to my house one day and before she even got inside the house my phone rang and it was Shawn Collie asking me who was at my house. (RSMo 565.225 Stalking) This scared and creeped me out because I knew for sure then that he was stalking me and watching my home. Heather Church came in and we were watching a movie but I was really scared and nervous. Heather and I decided to order pizza. When the pizza delivery guy brought the pizza to the door I didn't see a car in front of the house so that made me suspicious; I knew pizza delivery guys don't walk to deliver pizzas. (A-3 pg. 1-15) & (A-5 pg. 1-5 & 23) I kept the door cracked and watched the pizza guy walk up the street to the corner and start talking to someone in a white car. (A-3 pg. 2) I was scared and closed the door. I could not relax, I felt like something was wrong so I looked out the window and saw several guys in bullet proof vests with guns walking around the side of my mother's house then there was a loud knock at the front door and back door. Shawn Collie and other officers entered my mother's house and started looking around and Shawn Collie asked me whose house it was and I told him it was my Mom's. (RSMo I sec. 15 "Unreasonable search and seizure prohibited") My one year old daughter was there and so was Heather Church. (Pls. refer to Heather Church's statements that I provided to the Western District Court (A-5 pg. 1-4 & pg. 22-23) (This was my 4th encounter with Shawn Collie) I was 18 when this happened.

My Mother worked for Acme Music and Vending (A-3 pg. 5) and one day she came home and told me that she had a couple of visitors at work that day. Shawn Collie and Mike Strong were at my mother's work that day, supposedly looking at the building to buy, but my Mother and I's theory was that my mother drove the company

van and it had the company logo on it and it was parked in our driveway every night so we thought that they was really just scoping my Mom out to see what they was up against after we reported Shawn Collie to Mike Strong and the Sheriffs department. (A-3 pg. 5 & 7)

I was with Harold Frazer in 1998 and we were driving down the Hwy. and on an overpass I noticed several black vehicles and a MO State Trooper. When we drove under the overpass I looked into the mirror and saw them all coming down the overpass with their lights on. (A-3 pg.15; A-2 (b) pg.1-2) A Missouri State Trooper and a bunch of guys in bullet proof vests. The Missouri State Trooper arrested Harold Frazer for not reporting to his parole officer and Buchanan County Drug Strike Force / Shawn Collie arrested me for no reason but to have me transported to the Buchanan County jail to be stripped searched and they made me squat and pull my butt cheeks apart and cough. (I was only 18 yrs old at this time / I started seeing a psychiatrist in 1998 (A-9 pg. 12) Shawn had my car towed to the jail and took the wheels off of the car and searched through it. (42 U.S.C. Section 1983 allows police-misconduct victims to hold wrongdoing officers, their supervisors, and employers accountable.), (Fourth Amendment); (This was my 5th encounter with Shawn Collie) Buchanan County Drug Strike Force would not provide me with this arrest report. (A-2 (b) pg. 1-4; A-3 pg. 18)

When I turned 18 years old I gave copies of the phone conversations to an attorney by the name of John Warren and he told me when I asked for them back that he misplaced the tapes and couldn't find them. How did an attorney misplace tapes of that much significance? (There are two witnesses that can testify to this Harold Frazer and Kim Frazer) (18 USC sec.1512; RSMo 575.270;) (A-7)

In 1999 I was with Scott Modlin, as we were pulling into the parking lot of The Best Western I noticed a white van with Shawn Collie and other cops in it. (A-3 pg. 11-12; A-6) I told Scott Modlin not to pull in there because I knew it was Shawn Collie and his SWAT team, and I was already having problems with them ever since I reported Shawn Collie for offering me drugs for oral sex. Scott Modlin was only 18 yrs old and I was only 19 at the time. Scott Modlin did not listen to me and pulled in the parking lot anyways and they blocked the car I was in, in. A female officer yanked me from the passenger seat and slammed me to the pavement in sleet and snow for no reason 120lbs. She twisted my arm clear up my back, the same arm I had recently had surgery on and had a plate and seven screws put in it. I wasn't resisting and they opened the passenger door and yanked me from the vehicle and threw me to the pavement.

(RSMo 565.090 Harassment, first degree, penalty. - 1. A person commits the offense of harassment in the first degree if he or she, without good cause, engages in any act with the purpose to cause emotional distress to another person, and such act does cause such person to suffer emotional distress.);

(RSMo 565.225 Stalking, first degree, penalty. — 1. As used in this section and section RSMo 565.227, the term "disturbs" shall mean to engage in a course of conduct directed at a specific person that serves no legitimate purpose and that would cause a reasonable person under the circumstances to be frightened, intimidated or emotionally distressed.

2. A person commits the offense of stalking in the first degree if he or she purposely, through his or her course of conduct, disturbs or follows with the intent of disturbing another person and:

(1) Makes a threat communicated with the intent to cause the person who is the target of the threat to reasonably fear for his or her safety, the safety of his or her family or household member)

They searched all through the vehicle and apparently found one marijuana joint. (A-2 (b) pg. 5 - 13) I honestly didn't know there was a marijuana joint in the vehicle. They took Scott Modlin and I to jail. Scott Modlin was 18 yrs old and I was 19 yrs old when this happened. (This was my 6th encounter with Shawn Collie) Shawn Collie would not leave me alone and followed me, harassed me, intimidated me and tried to ruin my credibility. "Shawn Collie was not attempting to stop a crime, he was intimidating me (DURESS/COERCION) and trying to run the clock down on the statute of limitations because all his scare tactics took place in the first 5 yrs after he exposed his penis to me and offered me drugs for oral sex but I didn't realize that at the time because I was just a ignorant little girl, I didn't know anything about court proceedings or statute of limitations I was just a kid."

My reputation and social life suffered from all this and really affected my growth and development from transitioning from a teenage girl into a woman.

In 2001 I was with Harold Frazer at his grandmother's house and a cop pulled up and said they had a noise complaint. Harold decided to leave and we went to a motel. I went to the door of the motel room and the card key wasn't working and I couldn't get the door to open. I turned around to tell Harold that the key wasn't working and right then Shawn Collie and his SWAT team came running around the building with their guns pointed at us and screaming at us. (A-3 pg. 13 & 14) I was 20 or 21 yrs old when this happened. After I was transported to the jail and placed in a holding

cell, Shawn Collie came to my cell demanding that I give him the rest of the audio tapes I had if he released me from jail. (I requested the jail surveillance to prove this but the defendants refused to produce the surveillance footage and the Courts refused to grant my Motion to compel the surveillance) (A-2 (b) pg. 14 -17)

(This was my 7th encounter with Shawn Collie)

In 2002 I was attending college and was a passenger in a car with my cousin's wife and another friend when a dark unmarked car turned their lights on and pulled us over, It was Shawn Collie. I was 22 yrs old when this happened. (A-3 pg. 13) (This was my 8th encounter with Shawn Collie)

“Who has that many encounters with the same law enforcement officer with-in a 5yr period?” “I was being targeted.”

In 2002 I attended Missouri Western State College and I was so afraid to leave my car parked where I couldn't see it and I was afraid to leave my home unattended thinking Shawn Collie would try to plant something on me. I lived in a constant panic. My PTSD made it hard for me to stay focused in school and my grades suffered from it tremendously so I dropped out of college. (A-10) In 2006 I started receiving disability due to the severity of my PTSD, (A-9 pg. 11) I hated leaving my house; I constantly lived in a panic, had trouble sleeping and couldn't trust anyone. I had difficulty with alcohol because I would self medicate to try and relax and that caused me legal issues. Shawn's actions caused a domino effect of problems in my life, mental health, growth, family, education, relationships, jobs and affected the outcome of my life. Shawn Collie's actions changed the path of my life. I had not even graduated from high school yet. (And trust me when I say, they have

not made this easy on me just since I reported him again in 2019 and filed my complaint in Western District Court of Missouri)

I went to my pharmacy in 2010 or 2011, as I approached the door of the pharmacy I noticed Shawn Collie standing by the entryway speaking to another gentleman. Shawn asked me what I was doing and I told him that I was picking up my medicine. Then Shawn Collie said to me, "Go ahead, I'll verify your crazy." Shawn defamed my mental capacity and my name in public in front of people at my pharmacy. (Defamation 510.265) (This was my 9th encounter with Shawn Collie)

"The defendant's efforts to conceal his crime of sexual Misconduct resulted in many more crimes and caused injury to me."

Shawn Collie was not attempting to stop a crime, Shawn Collie was attempting to intimidate a young girl to show his authority and power over her and ruin her credibility so if she ever tried telling on him again she would look bad.

"AN ONGOING EXPOSURE EQUALS AN ONGOING INJURY"

So many strange things started happening around 2014 after my Dad and Mom passed away. I moved into a town just north of St. Joseph MO, called Amazonia, MO; population is only around 238 people. I moved into my fathers house after he passed away thinking I could live more peacefully in a small town but that was not the case. I started noticing odd cars driving through town. I lived across the street from the post office and a gentleman stayed parked in the parking lot of our small town post office for more than 4 hrs just sitting in his car. I went to a concert in 2015 with a friend and Shawn Collie made his appearance there. (This was my 10th encounter with Shawn).

While at the park for a family cookout in St. Joseph, MO and I saw a truck just sitting in the parking lot of the park. When I went back to the little town of Amazonia, MO as I started to enter the town I noticed the same truck that was just sitting at the park parked on the side of the highway just as you entered town. This caused my anxiety to go up. I was afraid to enter my own home because it was left unattended while I was at the park. One night I came home from work and noticed a van parked down the street with two guys in it. I decided to go ask them why they were sitting there in a small town with only a population of 300 people in it. As I approached the van I heard one of them say, "oh shit, she is coming over here". The gentleman said they were tired so they decided to rest. After I walked back across the street to my house, they left. I started having nightmares and trouble relaxing. I came home from work another day and it appeared someone had been in my house and on my computer because the screen was lit up and it wasn't my screen saver, it was something asking for a phone number to connect to the internet and I didn't have internet on my computer. The screen should not have been lit up and if it was lit up it should have been my screen saver. I have been seeing a psychiatrist ever since Shawn Collie exposed his penis to me and started targeting me. I was diagnosed with PTSD, anxiety and depression. I began to have problems with my short term memory in 2016 I went to see a neurologist who told me it was stress and trauma and anxiety from my PTSD causing the issue with my short term memory. (A-9 pg. 1-7) My psychiatrist changed my diagnosis from PTSD to Chronic PTSD. (A-9 pg. 25) In 2017 one evening I was in my living room watching TV and I kept thinking I saw something out the window, so I decided to go outside and look around. As I walked around the yard, when I got to the tree in my yard, I stepped on something; when I looked

down I found a drone up against the base of the tree with a camera on it. I took the drone and broke it and threw it in the trash can. (there is a witness to this as well) My Google map was showing me going places that I wasn't, like someone was logged into my Google account.

My dog would just start barking out of nowhere and my dog had never done this before it started happening a lot which made me panic and made my anxiety go up too and I was having trouble sleeping because I was afraid Shawn and his SWAT team were going to try and come into my home or try to plant something on my property. One day while laying in my bed reading I caught a glimpse of someone staring in my window. I couldn't see who it was because as soon as I noticed them, they took off running up behind my garage and when they did they knocked my metal wash tub across my concrete patio making a very loud noise. I started having nightmares and began to self medicate with alcohol again to help me sleep. My PTSD got so bad it was affecting my sleep and my mental health. I told my caseworker from my psychiatrist's office about Shawn following me to a concert and the people around town that didn't live there, how I caught someone looking through my bedroom window and I found a drone with the camera on it in my yard and everything else I was experiencing. I told her about what Shawn Collie had done to me and she said, "no wonder you have PTSD." She said it was like I was living in a war zone. This was the first time I had gotten someone to listen to me about what all Shawn Collie has done to me without diagnosing me as paranoid schizophrenic.

"An ongoing exposure equals an ongoing injury."

I called and reported Shawns sexual misconduct again to a different sheriff, Bill Puett, hoping something would get done because I was tired of living in a constant panic. The new Sheriff sent

Internal Affairs to take my statement. Mike Strong didn't handle my complaints properly because he never had Internal Affairs come and take my statement. (**Mandated reporters RSMo 210.115**);

Some time after speaking with the Internal Affairs investigator I received this check in the mail I had no idea who the people where who sent the check (**A-14 pg. 9-12**) Of course my paranoia made me think it was the cops trying to get me into trouble again for telling on Shawn Collie. I called the detective to see what was going on with the investigation and what was going to happen and the investigator told me that they would not keep me informed on their investigation. I found out that Shawn Collie was still working for the department. Once again I felt hopeless about getting anything done about what Shawn did to me.

“ How can an officer scare and course a teenage girl alone, drive her to a secluded area, toss an evidence bagging containing drugs in her lap and expose his penis to her then target her and get caught lying to the investigators, and have other female victims who have reported the same officer and still ~~ge~~ to keep his badge? How?” I have documents to back up everything I have told the detective but still just like before; nobody cares and nobody will do anything about what he did to me despite the witnesses, documents, other victims and the fact Shawn Collie knowingly lied to investigators. My story has never changed and I have documents backing up everything I have said. However Shawn Collie gets caught lying and has other female victims and still has a badge. How? How does that protect the girls of my community? I often wonder sometimes how different my life may have played out if he was more of a mentor that day vs. a pervert. His actions that day and his attempt to cover up his crime affected my life tremendously. I knew Shawn Collie had some kind of pull and was powerful when

the attorney told me he misplaced the audio tapes that I provided him.

I was talking to a couple of my late fathers veteran friends about everything Shawn did to me and I told them about what my Neurologist said about my short term memory. I told them about what Internal Affairs said to me, how they would not keep me updated on the investigation. I was upset that they were letting Shawn Collie get away with what he did to me. My fathers friend told me that I could file something with the courts myself and that I didn't need an attorney to do so. I thought since it was a Law Enforcement Officer and it was a federal thing, I thought I needed an attorney to do anything in the Federal Court System. They forced me to be silent about what Shawn Collie did to me, however, I am not a little girl anymore and I am not backing down. I started to Google what to do, back then when I was a teenager I didn't have Google at my fingertips. So I started spending my days and nights at the library and studying so I could get something done about what Shawn Collie has done to me.

A Private Investigator by the name of Scott Coats reached out to me and asked if I would speak to him. I was a little skeptical, thinking he was really working for the department just trying to get information for them. While speaking to the detective he told me there are several girls (A-8 pg. 13; A-12), and said some were afraid to come forward.

I am requesting The United States Supreme Court to reverse and remand the decision of the lower courts. There is proof of "Duress /Coercion", Many witnesses to these encounters, proof that I was being targeted, proof of fraudulent concealment, proof that Shawn Collie knowingly was Lying and Proof that the Buchanan County Sheriff's Department, Buchanan County Drug Strike Force and

Buchanan County Internal Affairs were all "**Negligent**" in how they handled my complaints and the other girls complaints as well and for keeping Shawn Collie employed.

"I have suffered a great deal of emotional distress and mental anguish. I have been learning how to live life after trauma. I've been suffering from PTSD, Anxiety and Depression since I was 17. My life was hindered due to Collie's actions. I have self medicated with alcohol and that caused me a lot of legal issues, relationship issues. I have not been able to have a meaningful relationship with anyone and I wasn't fully there for my children growing up due to my PTSD. It's not easy living with PTSD, anxiety and depression, there are days I just feel like giving up. Shawns actions affected my life and development tremendously. (A-9; A-15; A-16)

The plaintiff is seeking "**Economic Damages**" for medical care, loss wages, loss earnings, loss of income, loss of employment, education and other "**Monetary losses.**"

Plaintiff is seeking "**Noneconomic Damages**" for pain and suffering, for the inconveniences she has been faced with, mental anguish, emotional distress, injury to her reputation and humiliation, other non pecuniary damages, and any other theory of damages including, but not limited to, Panic, fear, fear of loss, emotional distress and mental anguish as I already mentioned.

Plaintiff is seeking "**Personal Injury**" mental distress and suffering, loss wages, employment, education, Economic damages and actual economic damages along with "Monetary damages", "Compensatory damages" and "Punitive damages".

I can back up everything I have said with documents and witnesses but yet Shawn Collie lied and was granted summary judgement; does that sound fair and just?

I often wonder how my life would have turned out if he would have been more of a mentor vs. a pervert.

Trust me, it hasn't been easy for me to keep fighting them but I just cling tight to GOD and keep fighting for what is right.

When I look at the American Flag it means something to me, maybe that's because my generation said The Pledge Of Allegiance everyday before school.

Shawn Collie's conduct and the Department's negligence should be addressed. As officers of the Law they should not be able to get away with sexual misconduct and lying during an investigation. **"It truly is about what Americans expect out of their government and officers of the law."** I don't think any jury in their right mind would rule in the officer's favor because he was caught lying. Summary Judgment should have never been granted in the first place. I, as an American, expect better from Law Enforcement. **My Seventh Amendment Right has been violated too** because there was and is enough evidence to support my claim and try my case. After everything I've had to fight through to get here in front of a Federal Judge only for them to turn a blind eye to the facts presented and the facts that prove Shawn Collie lied discourages my faith in my Country and Judicial system. Trust me when I say it wasn't easy for me to keep fighting and get here. I should be entitled to some kind of relief and Shawn Collie should not have a badge

"We have got to protect and defend The United States Constitution."

ONESTAR v. St. Francis Mission, Wisconsin Province of the Society of Jesus, and Diocese of Rapid City, Defendants. (2008)

Supreme Court of South Dakota.

Whether the statute of limitations was tolled by fraudulent concealment, Whether the statute of limitations was tolled under the doctrine of estoppel by duress.

[¶ 12.] In considering summary judgment on a statute of limitations defense, the burden of production shifts:

When faced with a “‘summary judgment motion where the defendant asserts the statute of limitations as a bar to the action and presumptively establishes the defense by showing the case was brought beyond the statutory period, the burden shifts to the plaintiff to establish the existence of material facts in avoidance of the statute of limitations[.]’” Generally, a statute of limitations question is left for the jury; however, “[d]eciding what constitutes accrual of a cause of action” is a question of law and reviewed de novo.”

Clearly anyone could see that what Shawn did to me would cause alarm, panic and fear especially for a teenage girl. I had guns pulled on me and was screamed at and thrown to the ground by these officers before I was ever 20 years of age. Clearly my parents were scared when Mike Strong and Shawn Collie entered my mothers place of employment after I reported him. Then they brought a SWAT team into my Moms house while my Mother was at work. They pulled me over on the interstate and hauled me to jail for the sole purpose to be stripped searched and they had no legal right to even place me in restraints and now they refuse to produce that arrest record but its clear there is one because the Missouri Highway State Patrol report says the Buchanan County Drug Strike Force (Shawn Collie) took me

to jail (A-2 (b) pg. 2) and the records department at the jail told me that she couldn't give it to me because it was not hers to give (A-3 pg. 18) I refused to let it go and when I turned 18, Harold Frazer, Kim Frazer and I took the audio tapes to a local attorney John Warren. That attorney told me that he misplaced the tapes (A-7) and then Shawn harassed and targeted me some more then he arrested me and charged me at 19 years of age with a marijuana joint that I wasn't in possession of. (A-2 (b) pg. 5-13)

A notable example of a case where summary judgment was arguably granted improperly is "**Celotex Corp. v. Catrett**," where the Supreme Court reversed a lower court decision that had granted summary judgment to the defendant because the plaintiff could not produce sufficient evidence.

Anderson v. Liberty Lobby, Inc.:

This Supreme Court case highlighted the importance of considering all evidence in the light most favorable to the non-moving party when reviewing a motion for summary judgment, emphasizing that a court should not grant summary judgment unless there is no genuine dispute as to any material fact.

"Despite the defence attorney and the departments fraudulently concealing material facts I still have produced enough evidence to prove Shawn Collie lied to the detective and I am not his only victim. Summary Judgement should not have been granted because lying creates a dispute."


CONCLUSION

"I AM AN AMERICAN CITIZEN AND I DO HAVE RIGHTS THAT ARE SECURED BY THE UNITED STATES CONSTITUTION."

"I have spent countless hours and money studying and learning how to fight for what's right. I have shed many tears reliving the trauma while working on this case for the past five years. Somebody needs to hold Shawn Collie accountable for his actions, he preys on young scared girls. He is a predator and he abuses his power.

I would like to extend my gratitude to the Honorable Judges who took time to read my petition and pray you will assist me in finding Justice so I can find life after trauma. (Please Read **A-18**)

SWORN THIS 7 DAY OF March 2024


By Jonetta L. Grieme