

**IN THE CIRCUIT COURT OF CLARK COUNTY
STATE OF INDIANA**

J.R.

PLAINTIFF

vs.

CASE NO: _____

**TIFFINIE TURNER f/k/a TIFFINIE SCHNEIDER
ADAM SCHNEIDER &
DEFENDANTS**

COMPLAINT
(Electronically filed)

Comes the plaintiff, J.R., by and through counsel, and for her complaint against the defendants, Adam Schneider and Tiffinie Turner, f/k/a Tiffinie Schneider, and provides as follows:

PARTIES, JURISDICTION AND VENUE

1. That the plaintiff is a resident of the State of Indiana.
2. That events described herein occurred while the plaintiff was a minor.
3. That the defendant, Adam Schneider, is a resident of the State of Indiana, with a last known address of 811 Biggs Rd., Memphis, IN 47143.
4. That the defendant, Tiffinie Turner, is a resident of the State of Indiana, with a last known address of 811 Biggs Rd, Memphis, IN 47143.
6. That the events giving rise to this action occurred in Clark County Indiana.
7. That the plaintiff's damages are in excess of the Court's jurisdictional requirements.
8. That Clark County, Indiana is the proper venue for this action.

INTRUSION ON SECLUSION AGAINST THE DEFENDANT, ADAM SCHNEIDER

9. That at all times material, the defendant, Tiffinie Turner, marketed and sold clothes out of her residence located at 811 Biggs Rd., Memphis, IN 47131.

10. That at all times material, the Defendant, Adam Schiender, was married to defendant, Tiffinie Turner, and resided at 811 Biggs Rd., Memphis, IN 47131.

11. That sometime prior to September 24, 2019, the defendant, Tiffinie Turner, contracted with the plaintiff to model the clothing that the defendant marketed and sold through an internet website.

12. That on or about September 24, 2019, the plaintiff appeared at the defendants' residence for a photo shoot conducted by the defendant, Tiffinie Turner.

13. That unbeknownst to the plaintiff, the defendant, Adam Schneider, installed a hidden camera in the changing room utilized by the plaintiff.

14. That the plaintiff had a reasonable expectation of privacy when she utilized the changing room.

15. That the plaintiff was secretly videotaped by the defendant, Adam Schneider.

16. That the defendant, Adam Schneider, intentionally intruded upon the plaintiff's seclusion.

17. That the defendant, Adam Schneider, knew that he did not have permission to intrude on the seclusion of the plaintiff.

18., That the aforesaid intrusion is highly offensive to a reasonable person.

19. That as a direct and proximate result of the seclusion, the plaintiff as a direct and proximate result of the defendant's negligence the plaintiff became injured and has suffered damages.

NEGLIGENCE AGAINST THE DEFENDANT, TIFFINIE TURNER

20. That the defendant, Tiffinie Turner, provided a changing room for plaintiff to change clothes to perform a modeling photoshoot.

21. That the defendant, Tiffinie Turner, had a duty to exercise reasonable care to protect the plaintiff's privacy while she changed clothes in the changing room.

22. That the defendant, Tiffinie Turner, know or should have known, that the defendant, Adam Schneider, had installed a hidden camera in the changing room.

23. That as a direct and proximate result of the defendant's Tiffinie Turner's, failure to exercise reasonable care to protect the privacy of the plaintiff, the plaintiff as a direct and proximate result of the defendant's negligence the plaintiff became injured and has suffered damages.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

24. That the defendant, Tiffinie Turner, intentionally inflicted emotional distress by posting messages on social media that would make a reasonable person believe that the defendant, Tiffinie Turner, intended to do physical harm to the plaintiff.

25. That as a direct and proximate result of the aforesaid intentional infliction of as a direct and proximate result of the defendant's negligence the plaintiff became injured and has suffered damages.

PUNITIVE DAMAGES

26. That the defendants conduct shocks the conscious of the community and constitutes malice.

27. That the plaintiff is entitled to punitive damages.

WHEREFORE, the plaintiff demands as follows:

1. Plaintiff prays for Judgment against the defendant;
2. For costs and reasonable attorneys' fees;
3. For trial by jury.
4. For punitive damages.
5. For all other relief of which the plaintiff may be deemed entitled.

Respectfully Submitted:

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