

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

Brittany L. Blair individually and on behalf of her 2 minor
children, M.R.G. 2018 and C.R.B. 2021

Plaintiff(s)

*(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)*

-v-

Sierra Strickland, Elijah Knepper, Rachel Burnsworth,
Amanda Vanleeuwen, Courtney Abbitt, John L. Blair
J. Lee Kelley Blair, Monroe County IN, Jennifer
Allen

Defendant(s)

*(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names. Do not include addresses here.)*

Case No.

1:25-cv-1970-JPH-TAB

(to be filled in by the Clerk's Office)

FILED**10/14/2025**

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Kristine L. Seufert, Clerk

Amended

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

Demand for Jury Trial☒ **Yes**☐ **No****NOTICE**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include *only*: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievances, witness statements, evidence, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

A. Are you bringing suit against (*check all that apply*):☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)**B.** Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

1. 4th amendment-unlawful seizure of children absent lawful state officials, no court order, and no exigent circumstances.
2. 14th amendment: Substantive (family integrity/ fundamental interest in parent/ child, child/ parent relationship) and Procedural Due Process, Equal Protection Clause, Defamation and Reputational harm.
3. 1st amendment- Free Exercise of Religion: Denial of Entry to child's doctor appointment to give religious exemption form and decline vaccines.
4. 8th amendment- Cruel and Unusual punishment: Children kept in harms way due to the Deliberate Indifference to serious risk or suffering by DCS and Monroe County Indiana by its Sheriff's Department failing to investigate sexual abuse allegations despite reports to both, pursuant to false statement that the report was “not factual”.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials? N/A**D.** Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Defendant 1: Sierra Strickland, Family Case Manager, Monroe County DCS: Defendant Strickland acted under the color of law by using her authority as a state child welfare worker to threaten and coerce plaintiff Brittany Blair to comply with her unlawful demand to “relinquish” her children by a certain time to defendants John and J. Lee Kelley Blair’s home, claiming that if she (pl. Blair) failed to do so, she would be faced with a warrant for her arrest and an amber alert would be put out for her children, minor pls. M.R.G. 2018 and C.R.B. 2021. She also acted under the color of law to initiate, and then later misrepresent the “emergency” removal of minor plaintiffs to the court by stating that Plaintiff Blair refused treatment offered to her in an attempt to prevent the removal of minor plaintiffs from her care/ custody. No offer was made, rather Defendant Strickland asked pl Blair if she felt as though she needed substance abuse treatment at the given time to which plaintiff responded “No”. Defendant Strickland also directed defendant John and J. Lee Kelley Blair to keep both minor plaintiffs prior to the emergency removal in question, and to not allow plaintiff Blair to leave with her children when she came to pick them up. All of defendant Strickland’s actions were taken from her state granted authority as a DCS employee.

Defendant 2: Elijah Knepper, Family Case Manager, Monroe County DCS: Defendant Knepper acted under the color of law by failing to provide timely referrals for services required by DCS Policies while reporting to the court that plaintiff Blair was “noncompliant”. Defendant Knepper failed to investigate allegations of sexual abuse pertaining to minor plaintiff M.R.G. 2018, and directed law enforcement that no investigation was needed, based on another defendant’s false statements regarding the incident, claiming there was “no factual basis” to the report. Defendant Knepper reasserted to the Monroe County Sheriff’s department that there was no factual basis to the report, even though minor plaintiff M.R.G. 2018 clearly and obviously had made a partial and indirect disclosure by all standards. Although indirect, the disclosure gave indicators of coaching, suppression, or fear-based conditioning, since M.R.G. 2018 clearly stated that foster parents directed her to not discuss the things that were asked about, due to the “inappropriateness” of the topic. Def. Knepper again reasserted that no disclosures were made in court, as well as on the record, committing perjury (a felony). Knepper informed plaintiff Blair she was not allowed to attend interview because there was concern that she would lead or influence minor plaintiff M.R.G. 2018 in some regard, however the individuals (and defendants) that instructed M.R.G. 2018 to not disclose things of a sexual nature that may have happened, were present and sitting in the next room for the duration of the interview. Also, Defendant Knepper was sent multiple background checks completed by friends/ family of pl. Blair who would have supervised plaintiff Blair’s visitation with her two children.

These background checks were never acknowledged. Furthermore, there was a court order for pl. Blair to have 6 hours of visitation weekly. Pl. Blair and both minor pls. went almost 1.5 years with no contact whatsoever. This year and a half of no contact was solely because of defendant Knepper's failure to run the background checks for possible "supervisors" provided to him by plaintiff Blair's friends and family. All of Defendant Knepper's misconduct was committed while acting in his state given authority as a DCS employee.

Defendant 3: Rachel Burnsworth, Monroe County DCS Supervisor: Defendant Burnsworth acted under the color of law by supervising the above listed defendants and FCM's, and directing the case decisions. Her responsibilities include but are not limited to overseeing removals, case plans, and court filings. It is reasonable to conclude that she knew or should have known that this removal was unlawful, and she failed to intervene in order to prevent her subordinates from violating all 3 plaintiff's constitutional rights. She operated in her state given authority as a DCS Supervisor.

Defendant 4: Amanda Vanleeuwen, Supervisor, Monroe County DCS. Defendant Vanleeuwen acted under the color of law when she directed and approved the threats of amber alerts and arrest made by defendant Strickland. Defendant Vanleeuwen also knew, or should have known that Defendant Strickland's actions were unlawful, and rather than intervening and preventing her subordinate from violating all three of the plaintiff's constitutional rights, defendant Vanleeuwen approved and endorsed defendant Strickland's actions directly, as she was also present on the phone call def. Strickland made to plaintiff Blair informing her of the "emergency removal" and confirmed its "validity". Defendant Vanleeuwen oversaw defendant Strickland's handling of the assessment, and permitted an unlawful emergency removal when she knew there were no exigent circumstances, making these actions deliberate. She reported and influenced the court through her official role as a DCS employee.

Defendant 5: Courtney Abbitt, Visit Supervisor, Family Solutions, contracted by Monroe County DCS. Defendant Abbitt acted under the color of law because despite Family Solutions being a private Agency, Family Solutions was Contracted by DCS to provide state mandated Supervised Visitation. Private parties performing government functions (foster care, child welfare services, etc.) are state actors when they: enforce state visitation restrictions, and/or report compliance/ non compliance to the court. Thus, defendant Abbitt's Negligence, inattentiveness, and false reporting took place while she acted in her authority granted to her by Monroe County DCS. Furthermore, non-investigation of potential child sex crimes is a felony under both state and federal law.

Defendant's 6 and 7: John L. Blair and J. Lee Kelley Blair, Licensed Foster Parents: Although Foster parents are typically viewed as private individuals and thus not liable under 1983 claims, in this particular instance, both John and J. Lee Kelley Blair are liable because they participated in the unlawful removal itself, directly. John and J. Lee Kelley Blair were the only people present at the time of the "emergency removal", without the presence of DCS in any capacity, no law enforcement agency was either notified or present for the removal, and no probation officer of any kind was present for the "emergency removal". By stepping into the role of State Officials without any valid order, they functioned as state agents carrying out the seizure of both minor plaintiffs. By becoming fully licensed foster parents and accepting placement as such, they were not acting in a purely private capacity, but rather state authorized caretakers, enforcing state custody of minors, specifically M.R.G. 2018 and C.R.B 2021. As licensed foster parents, it is reasonable to conclude that they knew, or should have known, that this removal was unlawful, as licensing for foster parents is extensive. By accepting the children absent the presence of a lawful state official and at the direction and instruction of defendant Strickland, assuming authority to detain M.R.G. 2018 and C.R.B. 2021 without a valid court order, and all of these actions being taken jointly with, and AS agents of the Indiana Department of Child Services, defendants John and J. Lee Kelley Blair have thus subjected themselves to liability under 42 U.S.C. 1983.

Defendant 8: Monroe County, Indiana: Through Monroe County's policies, customs, or lack of training, pls. rights to equal protection under the law were violated, and minor plaintiffs M.R.G. 2018 and C.R.B. 2021 were left in a state-created dangerous situation or environment while the State acted with willful and deliberate indifference to the matter.

Defendant 9: Jennifer Allen, Detective, Monroe County Sheriff's Department: failed to investigate allegations of child sexual abuse even after claiming to have watched the forensic interview, which contained disclosures described above with defendant Knepper. Her inaction and indifference to the matter was in her Official Role as a detective and as an employee of the Monroe County Sheriffs Department. When Plaintiff Blair reached out to the Indiana State Police to make a report, Jennifer Allen finally returned Plaintiff Blair's phone call, only to inform Plaintiff Blair that "she is married to the State Police Officer who was assigned her report, and that she does not appreciate plaintiff Blair attempting to report her to the Indiana State Police." That statement was also made while Plaintiff Jennifer Allen acted in her official role.

II. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name: Brittany L. Blair individually.
 Address: 3800 Sims Lane Bloomington, In. 47403
 County: Monroe
 Telephone Number: 812.679.0338
 E-Mail Address: blair.brittany182124@gmail.com

Name: M.R.G. 2018. Minor child of Brittany L. Blair
 Address: 3800 Sims Lane Bloomington, IN. 47403
 County: Monroe
 Telephone Number: 812.679.0338

Name: C.R.B. 2021. Minor child of Brittany L. Blair
 Address: 3800 Sims Lane Bloomington, IN 47403.
 County: Monroe
 Telephone Number: 812.679.0338

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

- Name: Sierra Strickland
- Job or Title (*if known*): DCS Family Case Manager
- Address 1531 South Curry Pike suite 600 Bloomington, IN 47403
- County: Monroe
- Telephone Number: 812.336.0851
- E-Mail Address (*if known*)



Individual capacity



Official capacity

Defendant No. 2

- Name: Elijah Knepper
- Job or Title (*if known*): DCS Family Case Manager
- Address: 1531 South Curry Pike suite 600 Bloomington, In. 47403
- County: Monroe
- Telephone Number: 812.336.0851
- E-Mail Address (*if known*)

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Individual capacity



Official capacity

Defendant No. 3:

- Name: Rachel Burnsworth
- Job or Title (*if known*): Supervisor, Monroe County DCS
- Address: 1531 South Curry Pike Suite 600 Bloomington IN 47403
- County: Monroe
- Telephone Number: 812.336.0851
- In Her Individual AND Official Capacity

Defendant No. 4:

Name: Amanda Vanleeuwen
Job or Title: Monroe County DCS Supervisor
Address: 1531 South Curry Pike suite 600 Bloomington IN 47403
County: Monroe
Telephone Number: 812.336.0851
In his Individual AND Official Capacity

Defendant No. 5:

Name: Courtney Abbitt
Job or Title: Family Solutions, Visit Supervisor
Address: 1180 Liberty Drive Bloomington
County: Monroe
Telephone Number: 812.335.1926

In her Individual AND Official Capacity.

Defendant No. 6:

Name: John L. Blair
Job or Title: Licensed Foster parent
Address: 8620 south gore road Bloomington IN 47403
County: Monroe
Telephone Number: 812.345.4152

In his Individual AND official capacity.

Defendant No. 7:

Name: J. Lee Kelley Blair
Job or title: Licensed Foster Parent
Address: 8620 South Gore Road Bloomington IN 47403
County: Monroe
Telephone number: 812.345.4151

In her Individual AND official capacity

Defendant No. 8:

Name: Monroe County, Indiana c/o Monroe County Board of Commissioners
Address: 100 W. Kirkwood Ave. Bloomington, IN 47404
Job or title: Board of Commissioners
Phone Number: 812.349.2550
In its Official Capacity.

Defendant No. 9:

Name: Jennifer Allen

Job or Title: Detective, Monroe County Sheriffs Department
 Address: 301 N. College Ave. Bloomington, IN 47404
 County: Monroe
 Telephone Number: 812.349.2780
 In her official AND individual capacity.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Claims:

1. Unlawful seizure, 4th Amendment. The seizure of Pl Blair's children, M.R.G. 2018 and C.R.B. 2021 was unlawful because there was no lawful State Authority present at the time of removal to take the children into "emergency" custody. There was no emergency and no exigent circumstances permitting the removal without a court order.
2. Denial of Substantive and Procedural Due Process, 14th amendment. Defendants deprived plaintiffs' of their fundamental liberty interest in family integrity and of fair procedures before and after removal by coercing surrender, falsifying records, and suppressing evidence.
3. Violation of Free exercise of Religion and Parental Medical Decision- Making, 1st and 14th amendments. By vaccinating minor plaintiffs over their mother's objection and denying entry to assert her religious exemption, defendants infringed the family's First amendment right to free exercise and parental authority.
4. Failure to protect and Deliberate Indifference to Known Risk, 14th amendment: After receiving disclosure of possible sexual abuse, Defendants failed to investigate or safeguard the minor pls, M.R.G. 2018 and C.R.B. 2021. Furthermore, after disclosures were made in forensic interview, disclosures were suppressed and denied altogether, and no follow up investigation occurred.
5. Defamation and Stigma- Plus Liberty Interest violation, 14th amendment: Defendants knowingly made and circulated false statements concerning minor pls. as well as pl Blair, causing reputational harm and loss of custody, a stigma plus violation of liberty.
6. Equal Protection Violation 14th amendment: Defendants treated Plaintiffs differently from similarly situated parents without rational basis and failed to provide equal protection under the law.
7. 8th amendment, Cruel and Unusual punishment: Minor kept in harms way as a result of deliberate indifference to allegations of sexual abuse by both DCS and Monroe County Sherriff's Detective. Monroe County Sheriff's department told pl. Blair over the phone that her " multiple run ins with different law enforcement agencies" was the reason for their non investigation.
8. Civil Rights Conspiracy: Defendants acted in concert to deprive Plaintiffs of Equal Protection and their constitutional rights through threats, false statements, suppression of evidence, unlawful removal, and failing to investigate.
9. Supervisory Liability and Failure to Train, 14th Amendment. Supervisory Defendants Burnsworth and Vanleeuwen knew or should have known that subordinates were violating constitutional rights and failed to train or intervene to prevent violations. Furthermore, they authorized the violations knowingly.

Defendant's conduct in all instances was willful, malicious, and in reckless disregard of Plaintiff's constitutional rights, entitling each plaintiff to punitive damages. The harm lasted from 11/2/2022 to

May 14th, 2025, and the Continuing Harm Doctrine Applies, making this filing well within the time limits.

- A. Where did the events giving rise to your claim(s) occur?
Monroe County, Indiana. Specifically 8620 South Gore Road Bloomington, IN 47403.
- B. What date and approximate time did the events giving rise to your claim(s) occur?
11/2/2022- 05/14/2025 (Continuing Harm Doctrine applies)
- C. What are the facts underlying your claim(s)? (*For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)
 1. On October 29, 2022, plaintiff Blair was arrested for suspected OWI while minor plaintiff C.R.B. 2021 was in the vehicle.
 2. On October 30, 2022, plaintiff Blair bonded out of Jail, and while picking up minor plaintiffs M.R.G. 2018 and C.R.B. 2021 from defendants' John and J. Lee Kelley Blair's home at 8620 South Gore Road Bloomington, IN. 47403, defendant John Blair confined and prevented the plaintiffs' departure. Law enforcement was called, and they confirmed that Pl Blair was legally well within her rights to leave with her children and to prevent her from doing so was unlawful.
 3. On November 1, 2022, defendant Sierra Strickland contacted pl Blair and asked her if she felt as though she needed substance abuse treatment at that time, to which plaintiff responded no. Defendant Strickland falsely misrepresented this to the court by stating that "in an attempt to prevent removal of M.R.G. 2018 and C.R.B 2021, mother was offered substance abuse treatment, which she refused"
 4. Also on November 1, 2022, Def. Strickland and Vanleeuwen together informed plaintiff Blair on the phone of an "emergency removal" of her children from her care, and stated that if the children were not relinquished to the home of def. John and J. Lee Kelley Blair by 7 pm that day, that there would be a warrant for the arrest of pl Blair, as well as amber alerts for M.R.G.2018 and C.R.B. 2021. Pl Blair complied, under duress. It should also be noted that def. Strickland had also previously, and prior to the emergency removal in question, instructed defendants John and J. Lee Kelley Blair to not allow Pl Blair to leave with her children when she arrived to pick them up. She told them to "keep both children for the time being", which was beyond the legal authority granted to her by the State as a DCS Employee.
 5. On November 2, 2022 All defendants excluding Elijah Knepper and Courtney Abbitt acted jointly to remove minor children M.R.G. 2018 and C.R.B. 2021 from the care and custody of their mother, Plaintiff Brittany Blair, in an unlawful "emergency" removal. The removal took place at 8620 South Gore Road Bloomington IN. 47403, which is the home address of defendants John Blair and J. Lee Kelley Blair, licensed Foster Parents. No lawful state authority or official was present to take custody of M.R.G. 2018 and C.R.B.2021, violating both state and federal laws and rendering this entire removal unlawful. Both state and federal law are very specific as to WHO is permitted to take emergency custody of a minor. It should also be noted that when pl Blair called the Monroe County DCS office to inquire as to why no one from their office was present during the removal of her children, defendant Amanda Vanleeuwen stated to plaintiff via telephone that "if it had been a true DCS removal, then DCS or one of the appropriate authorities would have been present for an emergency removal", however in this instance, defendants John and J. Lee Kelley Blair (licensed foster parents) were the only people present when Plaintiff's Blairs children were taken into "emergency " custody. It is also worth mentioning, that in June of 2022, Defendants John and J. Lee Kelley Blair presented plaintiff Blair with power of attorney papers

for M.R.G. 2018 and C.R.B. 2018, and wanted her to sign them. Plaintiff Blair refused, as defendants John and J. Lee Kelley Blair could not provide a clear or valid reason for doing so, but continued pressing and encouraging plaintiff Blair to sign them. Eventually defendant John Blair stated that “it was just incase something happens to you (plaintiff Blair)”, and the POA papers were post dated to become effective on September 27, 2022, if plaintiff Blair would have signed them.

6. Subsequent CHINS orders repeatedly misidentified minor plaintiff C.R.B. 2021 by an incorrect last name, despite multiple verbal corrections made by pl Brittany Blair. The Court never amended its petitions or orders to correctly identify minor C.R.B. 2021, thus no valid order existed for his continued removal.
7. During plaintiffs short time utilizing Family Solutions visitation supervision, defendant Courtney Abbitt ignored, suppressed, and otherwise dismissed extremely concerning behavior exhibited by minor plaintiff M.R.G. 2018 during more than one visit. M.R.G. 2018 was laying on the floor while plaintiff Blair read her a book, and minor plaintiff M.R.G. 2018 began rubbing her private areas and making noises and moaning and moving her hips in a very explicit and sexual manner. When plaintiff Blair asked her what she was doing, M.R.G. 2018 stated she was “making a yucky sound” and continued with the concerning behavior. Plaintiff Blair stopped her, and turned around to ask defendant Abbitt if she had seen what happened, which she had stated she did not, because she was “doing homework on her computer and listening to music”. Pl Blair had to say Courtney’s name MULTIPLE times just to get her attention. Defendant Abbitt then stated in her report to the court that plaintiff Blair was “clearly under the influence during the duration of this visit and that she was present and attentively supervising the visit the entire time, and that nothing plaintiff Blair stated had occurred regarding her daughter had any factual basis, and that if it did, she would have surely heard or saw what took place”. Her supervision was negligent and inattentive at best, and it is worth mentioning here, a policy of Family Solutions, being that in the event a parent is under the influence, the visit is to be terminated immediately. Plaintiff Blair was NOT under the influence, nor was her visit terminated as such. When DCS wouldn’t look into what had happened, pl Blair filed a police report with Monroe County Sheriffs Department, who told her they would immediately conduct a wellness check, set up a forensic interview, and that a detective would get ahold of her in the next couple of days.
8. Plaintiff Blair called the Monroe County Sheriffs department after several days of not hearing from any detective, and was told by a lieutenant that nothing would be moving forward in regards to her report. When plaintiff Blair asked “why”, it was repeated again, and that “pursuant to their conversation with DCS, nothing would be moving forward in regards to her report.”
9. Minor plaintiff M.R.G. 2018 later stated in a forensic interview conducted by Suzie’s Place in Bloomington Indiana that she did not feel as though she could safely talk about whether someone had touched her private areas or made her touch their private areas and that she only felt safe talking about those things to her mommy. When asked why she felt as though she couldn’t discuss those things with the interviewer, M.R.G. 2018 stated “because grandma and grandpa said I shouldn’t talk about those things because they are inappropriate”. It is worth noting that Grandparents are who brought her to the interview, and were sitting in the next room during the interview and pl Blair was not even notified of the interview having taken place until it was already completed and was not allowed to attend in any capacity. Elijah Knepper lied to the court in open court by stating that “no disclosures were made” even though minor plaintiff’s statements clearly was an indirect disclosure indicating there was grooming or external influence preventing the child from talking about whatever might have happened. A response such as this is

immediately (supposed to) trigger a mandatory reporting duty, usually with follow up interviews and law enforcement investigations.

10. Detective Jennifer Allen with the Monroe County Sheriffs department also told plaintiff Blair that she had the interview in her possession and no disclosures were made, and there was nothing to investigate, however this is clearly not the case and her failure to investigate demonstrates clear and deliberate indifference, and resulted in keeping minor plaintiffs in potentially dangerous state created conditions, jeopardizing their bodily integrity, and violating their rights to equal protection under the law. It is also worth noting that in addition to DCS and the Monroe County Sheriffs failing to investigate these allegations, that the DCS objected to the ordering of the interview twice in court, even though less than one year prior to DCS involvement. Pl Blair had to take M.R.G. 2018 to Bloomington Hospital to be evaluated for separate and unrelated concerns of sexual abuse possibly committed by minor plaintiff's father. DCS was notified in that instance as well and has provided plaintiff Blair with documented 311's for that instance as well, eliminating the possibility that the present report/ concerns are somehow not valid or credible, underscoring the intentional harm, willful indifference, perjury, etc.
11. Pl Brittany Blair attempted to provide minor pl. Doctor with a Religious exemption form prior to minor plaintiffs receiving vaccines, but was denied entry by minor plaintiffs doctors office (Southern Indiana Pediatrics) who stated that the minor plaintiff's legal guardians declined to allow her to be present, and that she was not able to make decisions regarding the medical care of her children. No guardianship order ever existed, and plaintiff Blair's parental rights remained in tact, which was asserted to the staff at the doctors office, but they stated they documentation that proved otherwise and that unless pl. Blair could prove otherwise, that she would not be permitted entry or to make decisions regarding the medical care of her children. The supposed legal guardians were defendants John and J. Lee Kelley Blair, licensed foster parents at the time, and any documentation provided to minor plaintiffs doctors office and presented as proof of "legal guardianship" was falsified and fraudulent.
12. Defendant and former FCM Elijah Knepper was terminated from his employment with DCS prior to the closing of this case, underscoring agency negligence.
13. As a result of all that is listed above, plaintiff Brittany Blair individually and on behalf of minor plaintiffs M.R.G 2018 and C.R.B. 2021 suffered immeasurable and irreparable harm due to the actions or inactions of defendants.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

As a direct and proximate result of the acts and omissions described herein, Plaintiffs Brittany L. Blair, M..R.G. 2018 and C.R.B. 2021 have suffered the following injuries, each of which was continuing in nature until the CHINS case was closed on May 14, 2025.

Constitutional Injuries: Deprivation of rights secured by the First, Fourth, and Fourteenth amendments; including the rights to due process of law, familial integrity/ association, religious and medical autonomy, equal protection, and freedom from unreasonable seizure.

Emotional and Psychological injuries: severe emotional distress, trauma, anxiety, fear, humiliation, and loss of trust in public institutions, post- traumatic stress symptoms in both minor plaintiffs, and irreparable and lasting harm to the parent- child bond.

Reputational and Social injuries- stigma and defamation resulting from false statements and reports to the court, inaccurately portraying plaintiffs' living situations and events leading up to the removal of both minor plaintiffs from pl Blair's custody and care.

Financial and Economic injuries: loss of income, homelessness (temporarily), expenses for therapy that all 3 plaintiffs are currently seeking.

Physical and bodily injuries: non- consensual medical procedures performed on both minor plaintiffs in violation of parental and religious rights, constituting bodily intrusion and a violation of both minor plaintiffs bodily integrity. Also, the alleged sexual abuse of minor plaintiff M.R.G. 2018, who made indirect disclosures during a forensic interview that defendant Knepper lied about in court by stating that “no disclosures were made, and committing perjury in doing so. No follow up conducted, no investigation , and children were left in a likely dangerous environment created by the state, while the state acted with deliberate willful indifference to the matter.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

WHEREFORE, Plaintiffs Brittany L Blair, individually and on behalf of her two minor children, M.R.G. 2018 and C.R.B. 2021, respectfully request that this Honorable Court:

1. Enter judgement in favor of Plaintiffs and against all Defendants, jointly and severally.
2. Award compensatory damages in the total amount of \$15,000,000.000 for the cumulative constitutional, emotional, reputational, financial, and otherwise continuing harms suffered by all three plaintiffs.
3. Award punitive damages against the individual Defendants in their personal capacities, in amounts sufficient to punish and deter future misconduct of this nature.
4. Issue declaratory relief that Defendants’ conduct grossly violated all 3 Plaintiff’s rights under the first, fourth, eighth and fourteenth amendments to the United States Constitution.
5. Grant injunctive and corrective relief, including expungement, sealing, or correction of all false or defamatory reports, records, and case files maintained by the Indiana Department of Child Services, Family Solutions, and any affiliated/ contracted agency.
6. Upon finding that Defendants’ actions were willful, malicious, or otherwise indicative of potential criminal violations of federal law- including but not limited to 18 U.S.C §§ 241-242 with aggravated outcomes (sexual abuse, kidnapping), refer this matter to the Office of the United States Attorney for review and any criminal proceedings deemed appropriate. This case is a constitutional crisis, and the full extent of the law is more than appropriate.
7. Grant such other and further relief as the Court deems just, proper, and equitable in the interests of justice.

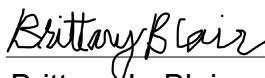
VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk’s Office with any changes to my address where case–related papers may be served. I understand that my failure to keep a current address on file with the Clerk’s Office may result in the dismissal of my case.

Date of signing: 10/13/2025

Signature of Plaintiff



Printed Name of Plaintiff

Brittany L. Blair

INSD Pro Se Civil Rights Complaint (unrelated to imprisonment) 12/19 (adapted from AO Pro Se 15 (Rev.
