

FILED  
MAR 24 2026

EDDIE JEAN CARR, CHANCERY CLERK  
BY P. W. White D.C.

IN THE CHANCERY COURT OF HINDS COUNTY, MISSISSIPPI  
FIFTH JUDICIAL DISTRICT

**SOUTHERN POVERTY LAW CENTER,**

**Plaintiff,**

**Civil Action No.**

25-26-286 T/

**v.**

**COMPLAINT**

**HINDS COUNTY SHERIFF'S OFFICE,  
MISSISSIPPI DEPARTMENT OF PUBLIC SAFETY,**

**Defendants.**

**INTRODUCTION**

1. This public records lawsuit challenges the failure of the Hinds County Sheriff's Office ("HCSO") and the Mississippi Department of Public Safety ("DPS") to respond to public records requests, despite several attempts at contact, regarding the deaths of individuals in HCSO's custody. HCSO has failed to respond for nearly a year.
2. Plaintiff Southern Poverty Law Center ("SPLC") requested information from both public bodies regarding the number of deaths, the demographics of the deceased individuals, and the manner of death.
3. This data exists because various news outlets have reported the deaths of individuals in HCSO custody at the Raymond Detention Center based on information obtained from HCSO and DPS.<sup>1</sup> According to DPS, at least five people have died at the detention center

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<sup>1</sup> Pam Dankins, *Detainee dies after alleged assault at Hinds County jail, sheriff says*, Clarion Ledger (April 23, 2025), <https://www.clarionledger.com/story/news/local/2025/04/23/hinds-county-detention-center-ms-death/83228058007/>; Anthony Warren and C.J. LeMaster, *Nine suspected opioid overdoses reported at Raymond Detention Center on July 9, internal memo reveals*, WLBT (Aug. 21, 2025), <https://www.wlbt.com/2025/08/21/nine-suspected-opioid-overdoses-reported-raymond-detention-center-july-9-internal-memo-reveals/>; Mina Corpuz, *Man gets life in Hinds County cellmate's death*, Mississippi Today (Nov. 6, 2025), <https://mississippitoday.org/2025/11/06/man-gets-life-in-hinds-county-cellmates-death/>.

from 2022 through April 2025.<sup>2</sup> However, media reports indicate that at least six deaths occurred at the facility in 2025 alone.<sup>3</sup> The conflicting information regarding the total number of deaths necessitates that HCSO disclose true and correct data on the deaths that have occurred in its custody.

4. Additionally, DPS is the state agency that collects data from local law enforcement offices on deaths in carceral settings in Mississippi pursuant to the federal Deaths in Custody Reporting Act (“DCRA”), Pub. L. No. 113-242. Therefore, DPS should also be in possession of this information.
5. Plaintiff asks for a full accounting of the deaths that have occurred since 2022.
6. The Mississippi Public Records Act (“MPRA”) clearly sets forth the requirements that a public body—which both HCSO and DPS are—must follow when public records are requested.
7. Neither agency has followed what is required of them as a public body by the MPRA.
8. HCSO has gone far beyond the required timeline under the MPRA for providing the requested records and has also failed to explain why it cannot do so within the required timeframe. DPS has provided no response, as required under the MPRA.
9. The public records requests are clear in their scope, and the public has a right to know the extent to which deaths are occurring in the custody of Hinds County and the reasons for those deaths.

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<sup>2</sup> Caleb Bedillion and Daja E. Henry, *Inside the Dangerous Hinds County Jail*, The Marshall Project (July 10, 2025), <https://www.themarshallproject.org/2025/05/01/another-death-in-hinds-county-jail>.

<sup>3</sup> Daja E. Henry, *Rare Oversight Beings at Hinds County’s Raymond Detention Center in Mississippi*, The Marshall Project (Oct. 1, 2025), <https://www.themarshallproject.org/2025/10/01/mississippi-hinds-county-jail-receivership>.

10. HCSO's and DPS's lack of response to SPLC's public records request is a clear violation of the MPRA. Plaintiff seeks an order from this Court directing HCSO and DPS to comply with their statutory obligations and to produce the requested records.

### **PARTIES**

11. Plaintiff SPLC is a non-profit organization dedicated to racial justice in the South and beyond, working in partnership with communities to dismantle white supremacy, strengthen intersectional movements, and advance the human rights of all people.

12. Defendant HCSO is a public body within the meaning of Miss. Code Ann. § 25-61-3 (defining "public body" to include "any...entity of the state of a political subdivision thereof"). It is a recipient of the public records request at issue in this lawsuit and possesses the requested records. HCSO maintains its primary place of business in Hinds County, Mississippi.

13. Defendant DPS is also a public body within the meaning of Miss. Code Ann. § 25-61-3. It is a recipient of the public records request at issue in this lawsuit and possesses the requested records. DPS maintains its primary place of business in Hinds County, Mississippi.

### **JURISDICTION AND VENUE**

14. The Court has jurisdiction over this action pursuant to Miss. Code Ann. § 25-61-13, which provides that an action to enforce the MPRA shall be brought in the chancery court of the county where the public body is located.

15. Venue in this Court is proper under Miss. Code Ann. §§ 11-5-1 and 25-61-13 since both HCSO and DPS are in Hinds County.

## FACTUAL ALLEGATIONS

### *Timeline of HCSO's MPRA Violations*

16. HCSO has failed to produce records and has not responded to a public records request submitted by Plaintiff, despite repeated transmission through multiple avenues of communication.
17. Pursuant to the MPRA, a public body must produce records in response to a public records request within seven working days. Miss. Code Ann. § 25-61-5(1)(a). If the public body is unable to produce records within that time, it must provide a written explanation of why the records cannot be produced within that time. Miss. Code Ann. § 25-61-5(1)(b).
18. It has been over nine months since Plaintiff submitted the initial public records request, far beyond the statutory time period required for a response from HCSO.
19. On May 29, 2025, SPLC requested the following public records from HCSO by mailing the request to the Hinds County Sheriff's Office at 407 E. Pascagoula St., Jackson, MS 39205:
  - a. Data submitted to the U.S. Department of Justice, Bureau of Justice Statistics, the Bureau of Justice Assistance, or a statewide agency/office for deaths in legal custody of Hinds County during the last three years, whether housed in a state prison, county jail, detention facility, or private facility. Forms submitted may include, but are not limited to, NPS-4, NPS-4A, CJ9, CJ9A, "Death in Custody Reporting Act" form, or records submitted/uploaded to the following websites: <https://ojpssso.ojp.gov>, <https://bjapmt.ojp.gov>. See Exhibit A, a true and correct copy of the May 29, 2025, request.

20. HCSO never responded to this request.
21. On August 8, 2025, SPLC sent the same request by certified mail to the Hinds County Sheriff's Office. HCSO never responded to that request. *See* Exhibit B, a true and correct copy of the August 8, 2025, request.
22. On October 7, 2025, Andrea Alajbegovic, a Senior Staff Attorney at SPLC and the undersigned, submitted the same request through an online form available on the Hinds County website at <https://www.hindscountymms.com/public-record-request-form>. No confirmation email or other confirmation was provided upon submitting the request. HCSO never responded to this request.
23. On November 17, 2025, Ms. Alajbegovic called HCSO's Records Department at (601) 974-2930 and spoke to Martha Patterson, Records Clerk.
24. Ms. Patterson informed Ms. Alajbegovic that the request should be emailed to her at [mpatterson@co.hinds.ms.us](mailto:mpatterson@co.hinds.ms.us), and to the following individuals: [jhall@halllawgrp.com](mailto:jhall@halllawgrp.com); [tmoore@co.hinds.ms.us](mailto:tmoore@co.hinds.ms.us); [cmorris@co.hinds.ms.us](mailto:cmorris@co.hinds.ms.us); and [jesthers@co.hinds.ms.us](mailto:jesthers@co.hinds.ms.us). Ms. Alajbegovic complied with Ms. Patterson's request and attached the March 2025 and August 2025 requests. *See* Exhibit C, a true and correct copy of the email request sent on November 17, 2025.
25. The email to "[jesthers@co.hinds.ms.us](mailto:jesthers@co.hinds.ms.us)" was returned as undeliverable, and there was no response from any of the other recipients at HCSO.
26. On December 2, 2025, Ms. Alajbegovic sent a follow-up email to the above recipients, again attaching the May 2025 and August 2025 requests. HCSO never responded. *See* Exhibit D, a true and correct copy of this follow-up email.

27. On December 18, 2025, Christopher Graves, a Senior Staff Attorney at SPLC, emailed John Hall, who had been included on the prior recipient list provided by Ms. Patterson to Ms. Alajbegovic, at [jhall@halllawgrp.com](mailto:jhall@halllawgrp.com). See Exhibit E, a true and correct copy of email correspondence from Mr. Graves. This email included Ms. Patterson ([mpatterson@co.hinds.ms.us](mailto:mpatterson@co.hinds.ms.us)) and [tmoore@co.hinds.ms.us](mailto:tmoore@co.hinds.ms.us) and attached the March 2025 and August 2025 requests. *Id.* Mr. Graves asked for “insight on when this request might be filled.” *Id.* Mr. Hall did not respond.
28. On January 7, 2026, Mr. Graves spoke to Mr. Hall over the phone and followed up by email. In that email, Mr. Graves attached the prior request, subsequent correspondence, and his prior email; noted that “SPLC has not received any correspondence in connection with these requests”; and copied, per Mr. Hall’s request, Ms. Patterson and Tenecka Moore, Hinds County Special Programs Coordinator, at [tmoore@co.hinds.ms.us](mailto:tmoore@co.hinds.ms.us). *Id.*
29. On January 8, 2026, Mr. Hall responded by email, “Thanks Chris. We’re on it.” See Exhibit F, a true and correct copy of Mr. Hall’s email.  
  
Mr. Hall’s response is the one and only response from any agent of the HCSO.
30. To date, HCSO has neither responded nor provided any records, and has offered no explanation for the lack of production.
31. It has been over nine months since SPLC sent its initial request for information regarding deaths at facilities operated by HCSO. Despite SPLC’s repeated efforts to provide HCSO with opportunities to respond through multiple methods of communication, HCSO has failed to comply with the MPRA.

*Timeline of DPS’s MPRA Violations*

32. DPS has also failed to produce records or respond to SPLC’s public records request.

33. Due to HCSO's failure to comply with the MPRA, SPLC made yet another attempt to obtain the records regarding deaths in HCSO's custody by submitting a public records request to DPS.
34. DPS is a public body that has access to information regarding the deaths that have occurred in HCSO's custody
35. It is required by the federal DCRA to "report to the Attorney General, on a quarterly basis...information regarding the death of any person who...is incarcerated at a municipal or county jail..."<sup>4</sup> Pub. L. No. 113-242. This report must, at a minimum, include "the name, gender, race ethnicity, and age of the deceased; the date, time, and location of death; the law enforcement agency that detained, arrested, or was in the process of arresting the deceased; and a brief description of the circumstances surround the death." *Id.*
36. DPS's website includes a link to a Microsoft Form where local law enforcement agencies can submit the above data for their agency.<sup>5</sup>
37. Additionally, a DPS spokesperson reported to the media that at least five people died at the Raymond Detention Center from 2022 through April 2025. This statement confirms that DPS possesses the information that SPLC requested.<sup>6</sup>
38. Based on these facts, on March 6, 2026, SPLC requested the following records from DPS through the agency's online portal (<https://mdpsms.nextrequest.com/>):

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<sup>4</sup> The requirements of the DCRA are also published on DPS's website, stating that "in Mississippi, the Office of Justice Planning (OJP) which operates under Public Safety Planning (PSP) is responsible for collecting and reporting death-in-custody data." Mississippi Department of Public Safety, *Death in Custody Reporting Act (DCRA)*, <https://www.dps.ms.gov/dps/files/PSP/dcra> (visited on March 19, 2026).

<sup>5</sup> Mississippi Department of Public Safety, *supra* note 4.

<sup>6</sup> Bedillion and Henry, *supra* note 2.

a. Data submitted to the U.S. Department of Justice, Bureau of Justice Statistics, the Bureau of Justice Assistance, or a statewide agency/office for deaths in legal custody of *Hinds County* during the last three years, whether housed in a state prison, county jail, detention facility, or private facility. Forms submitted may include, but are not limited to, NPS-4, NPS-4A, CJ9, CJ9A, "Death in Custody Reporting Act" form, or records submitted/uploaded to the following websites: <https://ojpssso.ojp.gov>, <https://bjapmt.ojp.gov>.

i. For reference, please view the attachments provided on the Mississippi Department of Public Safety and the federal Bureau of Justice Assistance websites:

1. Mississippi Department of Public Safety, *Death in Custody Reporting Act (DCRA)*, (visited on March 5, 2026), <https://www.dps.ms.gov/dps/files/PSP/dcra>.
2. Bureau of Justice Assistance – Office of Justice Programs, *Death in Custody Reporting Act – Data Collection Plan for Mississippi*, (visited on March 5, 2026), <https://bja.ojp.gov/doc/dcra-plan-ms.pdf>.

b. Any public statements made by any spokesperson or staff member of the Mississippi Department of Public Safety regarding deaths at the Raymond Detention Center in Hinds County, including but not limited to press releases, communications with the media, and public reports. *See* Exhibit G, a true and correct copy of this request.

39. This request was assigned to Robert E. Wentworth, Staff Officer, as the point of contact.

*Id.*

40. DPS failed to respond to this request within the statutory period.

41. On March 18, 2026, SPLC followed up on the above request by sending a message to DPS through its online request portal, noting that the statutory deadline had passed and requesting a response. *Id.*; See Miss. Code Ann. § 25-61-5(1)(a).

42. To date, DPS has not responded to SPLC's request or message, and has not produced records as required by the MPRA.

43. Plaintiff has served a copy of this Complaint upon the Mississippi Ethics Commission in accordance with Miss. Code Ann. § 25-61-13.

### **CLAIM FOR RELIEF**

#### **COUNT 1 – Violation of the MPRA (against HCSO and DPS)**

1. SPLC adopts by reference the facts and allegations as set forth in the preceding paragraphs as though fully set forth herein.
2. HCSO and DPS have unlawfully failed to respond to SPLC's request for public records in violation of the MPRA.
3. HCSO and DPS did not respond to SPLC's public records requests within seven working days as the MPRA requires.
4. Further, HCSO and DPS did not provide a written explanation for why each public body was unable to produce the public records that SPLC requested within seven working days.

5. To date, HCSO and DPS have not provided any records in response to SPLC's public records requests or any explanation for why it was unable to do so, in direct violation of the MPRA.

### **PRAYER FOR RELIEF**

Plaintiff respectfully requests that this Court:

1. Declare that HCSO has improperly withheld the requested records in violation of the MPRA because the records are not exempt from disclosure;
2. Order HCSO to produce the requested records;
3. Find HCSO liable in the amount of \$100.00 for each of its violations of the MPRA, as authorized by Miss. Code Ann. § 25-61-15;
4. Award Plaintiff its reasonable expenses in bringing this proceeding, including their attorneys' fees and costs, as authorized by Miss. Code Ann. § 25-61-15; and
5. Award such additional relief as the Court deems just and proper.

DATED this 24th day of March, 2026

Respectfully submitted,



SOUTHERN POVERTY LAW CENTER  
Andrea Alajbegovic, MS Bar. No. 106442  
111 East Capitol Street, Ste. 280  
Jackson, MS 39201  
(601) 265-8309  
andrea.alajbegovic@splcenter.org

# EXHIBIT A

Southern Poverty Law Center  
400 Washington Ave  
Montgomery, AL 36104  
splcenter.org



May 29, 2025

Sheriff Tyree D. Jones  
407 E. Pascagoula St.  
Jackson, MS 39205

Sent via: USPS

Re: Public Records Request

To Whom it May Concern:

Pursuant to the Mississippi Public Records Act, Mississippi Code § 25-61-1 et seq., I request the following public records:

- Data submitted to the U.S. Department of Justice, Bureau of Justice Statistics, the Bureau of Justice Assistance, or a statewide agency/office for deaths in legal custody of Hinds County during the last three years, whether housed in a state prison, county jail, detention facility, or private facility. Forms submitted may include, but are not limited to, NPS-4, NPS-4A, CJ9, CJ9A, "Death in Custody Reporting Act" form, or records submitted/uploaded to the following websites: <https://ojpsso.ojp.gov>, <https://bjapmt.ojp.gov>.

The requested public records may be provided to me in electronic or paper format, though electronic documents are preferred. I am willing to pay costs and fees for responding to this request up to a maximum of \$200.00. If you estimate that the fees will exceed this limit, please inform me before complying with this public record request. I can be reached by telephone at 202-841-7804 and by email at [tieffa.harper@splcenter.org](mailto:tieffa.harper@splcenter.org). Please send the records and invoice electronically to or by mail to:

Southern Poverty Law Center  
c/o Melody Mitchell  
400 Washington St.  
Montgomery, AL 36104



Where exemptions to the Public Records Act are discretionary, I ask that you release the records, even if they qualify for withholding under the law. If you withhold such records that are exempt, please redact the exempted portions and release the remainder of the records as required by Miss Code Ann. §25-61-5(2). If you withhold any records, please explain in writing the basis for withholding the records. See Miss Code Ann. §25-61-5(3).

If you have any questions regarding this request, please contact me by phone or email. I look forward to your reply as soon as is practicable, and no more than seven (7) working days from your receipt of this request. See Miss Code Ann. §25-61-5(1)(a).

Sincerely,

/s/ Tieffa N. Harper

Tieffa N. Harper

Deputy Director

Criminal Legal System Reform

SOUTHERN POVERTY LAW CENTER

400 Washington Ave.

Montgomery, Alabama 36104

202-841-7804

[tieffa.harper@splcenter.org](mailto:tieffa.harper@splcenter.org)

Southern Poverty Law Center  
400 Washington Ave  
Montgomery, AL 36104  
spicenter.org



LEGAL MAIL

Sheriff Tyree D. Jones  
Hinds County  
407 E. Pascagoula St.  
Jackson, MS 39205

LEGAL MAIL

# **EXHIBIT B**



August 8, 2025

Sheriff Tyree D. Jones  
Hinds County  
407 E. Pascagoula St.  
Jackson, MS 39205

Sent via: USPS

Re: Public Records Request

To Whom it May Concern:

On 05/29/2025 I sent you the enclosed request for public records pursuant to the Mississippi Public Records Act, Mississippi Code § 25-61-1 *et seq.*

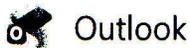
As a reminder, Mississippi law requires that you provide public records within no more than seven (7) working days. *See* Miss Code Ann. §25-61-5(1)(a). If that was not possible, you were required to provide a written explanation detailing why you could not produce the records within seven days. *See* Miss Code Ann. §25-61-5(1)(b). As of the date of this letter, that deadline has passed and we have not received any communication from you. Therefore, you are in violation of Mississippi law.

We hope to resolve this matter without the need for legal action. To that end, please provide the requested records as soon as possible upon receipt of this letter. If you have any questions regarding this request, please contact me by phone or email.

Sincerely,

  
Andrea Alajbegović  
Senior Staff Attorney  
SOUTHERN POVERTY LAW CENTER  
111 East Capitol Street, Ste. 280  
Jackson, MS 39201  
601-265-8309

# EXHIBIT C



## Records Request for Hinds County Sheriff's Office

From Andrea Alajbegovic <andrea.alajbegovic@splcenter.org>

Date Mon 11/17/2025 4:35 PM

To mpatterson@co.hinds.ms.us <mpatterson@co.hinds.ms.us>

Cc jhall@halllawgrp.com <jhall@halllawgrp.com>; tmoore@co.hinds.ms.us <tmoore@co.hinds.ms.us>; cmorris@co.hinds.ms.us <cmorris@co.hinds.ms.us>; jesthers@co.hinds.ms.us <jesthers@co.hinds.ms.us>; CDI-SPLC <CDI-SPLC@splcenter.org>

2 attachments (451 KB)

Sheriff Tyree D. Jones, Hinds County.pdf; 2025.08.08 - Hinds County Sheriff Second PRR.pdf;

Dear Ms. Patterson,

It was a pleasure speaking to you this afternoon. Please see attached a public records request and follow up that were mailed the Sheriff Tyree Jones in June and August of this year. For your convenience, the data I am requesting is copied below:

- Data submitted to the U.S. Department of Justice, Bureau of Justice Statistics, the Bureau of Justice Assistance, or a statewide agency/office for deaths in legal custody of Hinds County during the last three years, whether housed in a state prison, county jail, detention facility, or private facility. Forms submitted may include, but are not limited to, NPS-4, NPS-4A, CJ9, CJ9A, "Death in Custody Reporting Act" form, or records submitted/uploaded to the following websites: <https://ojpssso.ojp.gov>, <https://bjapmt.ojp.gov>.

Should you or your colleagues have any questions for me, please do not hesitate to let me know.

Best,

Andrea



**Andrea Alajbegović** she/her/hers ([pronounce](#))  
Senior Staff Attorney I | Criminal Legal System Reform Litigation Team  
Southern Poverty Law Center  
T 601.265.8309  
[andrea.alajbegovic@splcenter.org](mailto:andrea.alajbegovic@splcenter.org) | [splcenter.org](http://splcenter.org)  
Licensed in Mississippi and New York

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# EXHIBIT D

**RE: Records Request for Hinds County Sheriff's Office**

From Andrea Alajbegovic <andrea.alajbegovic@splcenter.org>

Date Tue 12/2/2025 3:53 PM

To mpatterson@co.hinds.ms.us <mpatterson@co.hinds.ms.us>

Cc jhall@halllawgrp.com <jhall@halllawgrp.com>; tmoore@co.hinds.ms.us <tmoore@co.hinds.ms.us>; cmorris@co.hinds.ms.us <cmorris@co.hinds.ms.us>; jesthers@co.hinds.ms.us <jesthers@co.hinds.ms.us>; CDI-SPLC <CDI-SPLC@splcenter.org>

Dear Ms. Patterson,

I hope you enjoyed a restful Thanksgiving.

I am following up on the public records requests that were sent to the Hinds County Sheriff's Office. Please let me know when I should expect a response.

Best,

Andrea



**Andrea Alajbegović** she/her/hers ([pronounce](#))  
Senior Staff Attorney I | Criminal Legal System Reform Litigation Team  
Southern Poverty Law Center  
T 601.265.8309  
[andrea.alajbegovic@splcenter.org](mailto:andrea.alajbegovic@splcenter.org) | [splcenter.org](http://splcenter.org)  
Licensed in Mississippi and New York

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**From:** Andrea Alajbegovic

**Sent:** Monday, November 17, 2025 3:35 PM

**To:** 'mpatterson@co.hinds.ms.us' <mpatterson@co.hinds.ms.us>

**Cc:** 'jhall@halllawgrp.com' <jhall@halllawgrp.com>; 'tmoore@co.hinds.ms.us' <tmoore@co.hinds.ms.us>; 'cmorris@co.hinds.ms.us' <cmorris@co.hinds.ms.us>; 'jesthers@co.hinds.ms.us' <jesthers@co.hinds.ms.us>; CDI-SPLC <CDI-SPLC@splcenter.org>

**Subject:** Records Request for Hinds County Sheriff's Office

Dear Ms. Patterson,

It was a pleasure speaking to you this afternoon. Please see attached a public records request and follow up that were mailed the Sheriff Tyree Jones in June and August of this year. For your convenience, the data I am requesting is copied below:

- Data submitted to the U.S. Department of Justice, Bureau of Justice Statistics, the Bureau of Justice Assistance, or a statewide agency/office for deaths in legal custody of Hinds County during the last three years, whether housed in a state prison, county jail, detention facility, or

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private facility forms submitted may include, but are not limited to, NPS 4, NPS 4A, CJ9, CJ9A, "Death in Custody Reporting Act" form, or records submitted/uploaded to the following websites: <https://ojpsso.ojp.gov>, <https://bjapmt.ojp.gov>.

Should you or your colleagues have any questions for me, please do not hesitate to let me know.

Best,

Andrea



**Andrea Alajbegović** she/her/hers ([pronounce](#))  
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# **EXHIBIT E**

**FW: Records Request for Hinds County Sheriff's Office**

**From** Christopher Graves <christopher.graves@splcenter.org>

**Date** Wed 1/7/2026 3:37 PM

**To** jhall@halllawgrp.com <jhall@halllawgrp.com>

**Cc** Andrea Alajbegovic <andrea.alajbegovic@splcenter.org>; Tina Gillespie La Borde <tina.laborde@splcenter.org>; mpatterson@co.hinds.ms.us <mpatterson@co.hinds.ms.us>; tmoore@co.hinds.ms.us <tmoore@co.hinds.ms.us>

2 attachments (451 KB)

Sheriff Tyree D. Jones, Hinds County.pdf; 2025.08.08 - Hinds County Sheriff Second PRR.pdf;

John,

It was a pleasure speaking with you just now. I have included the prior PRR request (attached), our subsequent correspondence, and my email below. To date, SPLC has not received any correspondence in connection with these requests.

Per your request, I have also cc'ed attorney Tenecka Moore (Hinds County Special Programs Coordinator) and Martha Patterson (Hinds County Sheriff's Office Records Clerk). Please let me know if any future PRR requests should be directed to them, also.

Thanks again for taking my call, old friend. I appreciate your time.

Very Truly,

Chris



**Chris Graves** he/him/his

Senior Staff Attorney | Criminal Legal System Reform Litigation Team

Southern Poverty Law Center

C 425.923.0272

[christopher.graves@splcenter.org](mailto:christopher.graves@splcenter.org) | [splcenter.org](http://splcenter.org)

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**From:** Christopher Graves

**Sent:** Thursday, December 18, 2025 11:59 AM

**To:** 'jhall@halllawgrp.com' <jhall@halllawgrp.com>

**Cc:** Andrea Alajbegovic <andrea.alajbegovic@splcenter.org>

**Subject:** FW: Records Request for Hinds County Sheriff's Office

John,

I hope you're doing well. If you have a moment, I'd like to talk about the attached PRR. My colleague and I are trying to get some insight on when this request might be filled.

Thank in advance for your help,

Chris



**Chris Graves** he/him/his  
Senior Staff Attorney | Criminal Legal System Reform Litigation Team  
Southern Poverty Law Center  
C 425.923.0272  
[christopher.graves@splcenter.org](mailto:christopher.graves@splcenter.org) | [splcenter.org](http://splcenter.org)  
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**From:** Andrea Alajbegovic

**Sent:** Monday, November 17, 2025 3:35 PM

**To:** 'mpatterson@co.hinds.ms.us' <[mpatterson@co.hinds.ms.us](mailto:mpatterson@co.hinds.ms.us)>

**Cc:** 'jhall@halllawgrp.com' <[jhall@halllawgrp.com](mailto:jhall@halllawgrp.com)>; 'tmoore@co.hinds.ms.us' <[tmoore@co.hinds.ms.us](mailto:tmoore@co.hinds.ms.us)>; 'cmorris@co.hinds.ms.us' <[cmorris@co.hinds.ms.us](mailto:cmorris@co.hinds.ms.us)>; 'jesthers@co.hinds.ms.us' <[jesthers@co.hinds.ms.us](mailto:jesthers@co.hinds.ms.us)>; CDI-SPLC <[CDI-SPLC@splcenter.org](mailto:CDI-SPLC@splcenter.org)>

**Subject:** Records Request for Hinds County Sheriff's Office

Dear Ms. Patterson,

It was a pleasure speaking to you this afternoon. Please see attached a public records request and follow up that were mailed the Sheriff Tyree Jones in June and August of this year. For your convenience, the data I am requesting is copied below:

- Data submitted to the U.S. Department of Justice, Bureau of Justice Statistics, the Bureau of Justice Assistance, or a statewide agency/office for deaths in legal custody of Hinds County during the last three years, whether housed in a state prison, county jail, detention facility, or private facility. Forms submitted may include, but are not limited to, NPS-4, NPS-4A, CJ9, CJ9A, "Death in Custody Reporting Act" form, or records submitted/uploaded to the following websites: <https://ojpsso.ojp.gov>, <https://bjapmt.ojp.gov>.

Should you or your colleagues have any questions for me, please do not hesitate to let me know.

Best,

Andrea



**Andrea Alajbegović** she/her/hers (pronounce)  
Senior Staff Attorney I | Criminal Legal System Reform Litigation Team  
Southern Poverty Law Center  
T 601.265.8309  
[andrea.alajbegovic@splcenter.org](mailto:andrea.alajbegovic@splcenter.org) | [splcenter.org](http://splcenter.org)  
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3/17/26, 2:45 PM

CDI - Andrea Alajbegovic - Outlook

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Case: 25-01126-cv-00286 Document# 2 Filed: 03/24/26 Page 26 of 38

# **EXHIBIT F**

**Re: Records Request for Hinds County Sheriff's Office**

From John HALL <jhall@halllawgrp.com>

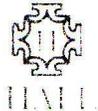
Date Thu 1/8/2026 11:00 AM

To Christopher Graves <christopher.graves@splcenter.org>

Cc Andrea Alajbegovic <andrea.alajbegovic@splcenter.org>; Tina Gillespie La Borde <tina.laborde@splcenter.org>; mpatterson@co.hinds.ms.us <mpatterson@co.hinds.ms.us>; tmoore@co.hinds.ms.us <tmoore@co.hinds.ms.us>

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Thanks Chris. We're on it.



John C. Hall, II, Esq.  
Owner  
The Hall Law Group, PLLC  
263 E. Pearl St.  
Jackson, MS 39201  
Ph. 601 398-2089  
Fax. 601 812-6266

**From:** Christopher Graves <christopher.graves@splcenter.org>  
**Date:** Wednesday, January 7, 2026 at 3:37 PM  
**To:** jhall@halllawgrp.com <jhall@halllawgrp.com>  
**Cc:** Andrea Alajbegovic <andrea.alajbegovic@splcenter.org>, Tina Gillespie La Borde <tina.laborde@splcenter.org>, mpatterson@co.hinds.ms.us <mpatterson@co.hinds.ms.us>, tmoore@co.hinds.ms.us <tmoore@co.hinds.ms.us>  
**Subject:** FW: Records Request for Hinds County Sheriff's Office

John,

It was a pleasure speaking with you just now. I have included the prior PRR request (attached), our subsequent correspondence, and my email below. To date, SPLC has not received any correspondence in connection with these requests.

Per your request, I have also cc'ed attorney Tenecka Moore (Hinds County Special Programs Coordinator) and Martha Patterson (Hinds County Sheriff's Office Records Clerk). Please let

me know if any future PRR requests should be directed to them, as I do not know if they are still active. **Case: 25-cv-00266-PRR-00000-17 Filed 12/18/25 Page 29 of 38**

Thanks again for taking my call, old friend. I appreciate your time.

Very Truly,

Chris



**Chris Graves** he/him/his  
Senior Staff Attorney | Criminal Legal System Reform Litigation Team  
Southern Poverty Law Center  
C 425.923.0272  
[christopher.graves@splcenter.org](mailto:christopher.graves@splcenter.org) | [splcenter.org](http://splcenter.org)  
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**From:** Christopher Graves  
**Sent:** Thursday, December 18, 2025 11:59 AM  
**To:** 'jhall@halllawgrp.com' <jhall@halllawgrp.com>  
**Cc:** Andrea Alajbegovic <andrea.alajbegovic@splcenter.org>  
**Subject:** FW: Records Request for Hinds County Sheriff's Office

John,

I hope you're doing well. If you have a moment, I'd like to talk to you about the attached PRR. My colleague and I are trying to get some insight on when this request might be filled.

Thank in advance for your help,

Chris



**Chris Graves** he/him/his  
Senior Staff Attorney | Criminal Legal System Reform Litigation Team  
Southern Poverty Law Center  
C 425.923.0272  
[christopher.graves@splcenter.org](mailto:christopher.graves@splcenter.org) | [splcenter.org](http://splcenter.org)  
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**From:** Andrea Alajbegovic  
**Sent:** Monday, November 17, 2025 3:35 PM  
**To:** 'mpatterson@co.hinds.ms.us' <mpatterson@co.hinds.ms.us>  
**Cc:** 'jhall@halllawgrp.com' <jhall@halllawgrp.com>; 'tmoore@co.hinds.ms.us' <tmoore@co.hinds.ms.us>; 'cmorris@co.hinds.ms.us' <cmorris@co.hinds.ms.us>; 'jesthers@co.hinds.ms.us' <jesthers@co.hinds.ms.us>; CDI-SPLC <CDI-SPLC@splcenter.org>  
**Subject:** Records Request for Hinds County Sheriff's Office

Dear Ms. Patterson, Case No. 25-cv-00286 Document #: 2 Filed: 03/24/2026 Page 30 of 38

It was a pleasure speaking to you this afternoon. Please see attached a public records request and follow up that were mailed the Sheriff Tyree Jones in June and August of this year. For your convenience, the data I am requesting is copied below:

- Data submitted to the U.S. Department of Justice, Bureau of Justice Statistics, the Bureau of Justice Assistance, or a statewide agency/office for deaths in legal custody of Hinds County during the last three years, whether housed in a state prison, county jail, detention facility, or private facility. Forms submitted may include, but are not limited to, NPS-4, NPS-4A, CJ9, CJ9A, "Death in Custody Reporting Act" form, or records submitted/uploaded to the following websites: <https://ojpssso.ojp.gov>, <https://bjapmt.ojp.gov>.

Should you or your colleagues have any questions for me, please do not hesitate to let me know.

Best,

Andrea



**Andrea Alajbegović** she/her/hers (pronounce)  
Senior Staff Attorney I | Criminal Legal System Reform Litigation Team  
Southern Poverty Law Center  
T 601.265.8309  
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# EXHIBIT G



**Your Mississippi Department of Public Safety public records request #26-648 has been submitted.**

From Mississippi Department of Public Safety Public Records <messages@nextrequest.com>

Date Fri 3/6/2026 1:56 PM

To Andrea Alajbegovic <andrea.alajbegovic@splcenter.org>

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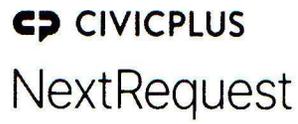
-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

## Mississippi Department of Public Safety Public Records

**Your record request #26-648 has been submitted successfully.**

As the requester, you can always see the status of your request by signing into the Mississippi Department of Public Safety [portal](#).

If you haven't already signed in, you may need to [activate or setup your account](#) to get started. Once your account is activated, you can communicate directly with the Mississippi Department of Public Safety through NextRequest.



Reply to this email or sign in to contact Mississippi Department of Public Safety.

[Change your email settings](#) | [Visit our help center](#)

Mississippi Department of Public Safety



Request Visibility: Unpublished

# Request 26-648



## Dates

Received

March 06, 2026 via web

## Request

**March 6, 2026**

**VIA ONLINE FORM**

Mississippi Department of Public Safety

c/o Division of Public Safety Planning (PSP) – Office of Justice Programs (OJP)

P.O. Box 958

Jackson, MS 39205

## Requester

Andrea Alajbegovic

andrea.alajbegovic@splcenter.org

111 E. Capitol St., Suite 280 ,  
Jackson, MS, 39201

601-265-6309

Southern Poverty Law Center

**Re: Public Records Request to Mississippi Department of Public Safety for Data on Deaths in Custody in Hinds County**

To Whom It May Concern:

## Invoices

No invoices due

Pursuant to the Mississippi Public Records Act, Mississippi Code § 25-61-1 et seq., I request the following public records:

## Staff assigned

Departments

- Data submitted to the U.S. Department of Justice, Bureau of Justice Statistics, the Bureau of Justice

Case: 25-cv-00286 Document # 2 Filed: 03/24/2026 Page 35 of 38  
 No departments available  
 Point of contact  
 Robert E. Wentworth

Assistance, or a state-wide agency office for deaths in legal custody of **Hinds County** during the last three years, whether housed in a state prison, county jail, detention facility, or private facility. Forms submitted may include, but are not limited to, NPS-4, NPS-4A, CJ9, CJ9A, "Death in Custody Reporting Act" form, or records submitted/uploaded to the following websites:  
<https://ojpssso.ojp.gov>, <https://bjapmt.ojp.gov>.

- For reference, please view the attachments provided on the Mississippi Department of Public Safety and the federal Bureau of Justice Assistance websites:
- Mississippi Department of Public Safety, *Death in Custody Reporting Act (DCRA)*, (visited on March 5, 2026), <https://www.dps.ms.gov/dps/files/PSP/dcra>.
- Bureau of Justice Assistance – Office of Justice Programs, *Death in Custody Reporting Act – Data Collection Plan for Mississippi*, (visited on March 5, 2026), <https://bja.ojp.gov/doc/dcra-plan-ms.pdf>.
- Any public statements made by any spokesperson or staff member of the Mississippi Department of Public Safety regarding deaths at the Raymond Detention Center in Hinds County, including but not limited to press releases, communications with the media, and public reports.

The requested public records may be provided to me in electronic or paper format. I am willing to pay costs and fees for responding to this request up to a maximum of \$200.00. If you estimate that the fees will exceed this limit, please inform me before complying with this public record request.

I can be reached by telephone at 601-265-8309 and by email at [andrea.alajbegovic@splcenter.org](mailto:andrea.alajbegovic@splcenter.org). Please send the records and invoice to me electronically or by mail at Southern Poverty Law Center, c/o Andrea

Where exemptions to the Public Records Act are discretionary, I ask that you release the records, even if they qualify for withholding under the law. If you withhold such records that are exempt, please redact the exempted portions and release the remainder of the records as required by Miss Code Ann. § 25-61-5(2). If you withhold any records, please explain in writing the basis for withholding the records. See Miss Code Ann. § 25-61-5(3). If you have any questions regarding this request, please contact me by phone or email. I look forward to your reply as soon as is practicable, and no more than seven (7) working days from your receipt of this request. See Miss Code Ann. § 25-61-5(1)(a).

Thank you for your assistance regarding this matter.

Sincerely,

SOUTHERN POVERTY LAW CENTER

Andrea Alajbegovic

Senior Staff Attorney

Show less

Timeline Documents



Message from requester



Requester + Staff

**VIA ONLINE FORM**

Mississippi Department of Public Safety

c/o Juvenile Facility Monitoring Unit

P.O. Box 958

Jackson, MS 39205

**Re: Public Records Request to Mississippi  
Department of Public Safety – Juvenile Facility  
Monitoring Unit**

To Whom It May Concern:

The statutory deadline for your response was seven (7) working days from the receipt of this public records request. That deadline was yesterday (March 17) and has now passed. Please respond as soon as possible.

Sincerely,

SOUTHERN POVERTY LAW CENTER

Andrea Alajbegovic

Senior Staff Attorney

March 18, 2026, 10:42am by Andrea Alajbegovic



**Request opened**

Anyone with access to this request

Request received via web

March 6, 2026, 1:56pm by Andrea Alajbegovic

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<https://www.dps.ms.gov/>

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NextRequest