UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

LEROY NELLIS,
Plaintiff,

v.

WILLIAMSON COUNTY, TEXAS, et al.,
Defendants.

Civil Action No. 1:26-cv-02592

JURY TRIAL DEMANDED

PLAINTIFF'S FIRST AMENDED COMPLAINT

Plaintiff Leroy Nellis, proceeding pro se, files this First Amended Complaint against the above-named Defendants and would show the Court as follows:

I. NATURE OF THE ACTION

1. This is a civil rights action under 42 U.S.C. § 1983 seeking damages, declaratory relief, and injunctive relief for violations of Plaintiff's constitutional rights under the Fourth, Sixth, Eighth, and Fourteenth Amendments. The violations include false arrest, malicious prosecution, fabrication of evidence from recorded telephone conversations, denial of medical care, unlawful surveillance and recording in attorney-client meeting rooms, systematic recording and artificial-intelligence analysis of inmate telephone calls through the NCIC system, and the knowing use of expunged records and false charges by Williamson County officials.

II. JURISDICTION AND VENUE

2. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343. Venue is proper in the Western District of Texas under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claims occurred in Williamson County, Texas.

III. PARTIES

3. Plaintiff Leroy Nellis is an individual residing in Travis County, Texas. He is legally blind and has permanent nerve damage. These disabilities were known or should have been known to Defendants.

4. Defendant Williamson County, Texas is a governmental entity that is a person within the meaning of 42 U.S.C. § 1983.

5. Defendant Shawn Dick is the District Attorney for Williamson County, Texas. He is sued in his individual and official capacities.

6. Defendant Matthew Lindemann is the Sheriff of Williamson County, Texas (in office since January 1, 2025). He is sued in his individual and official capacities.

7. The following individual Defendants are officers, deputies, and officials of the Williamson County Sheriff's Office and related agencies, sued in their individual and official capacities: Larry R. Davis, Joshua D. Ransom, Rachael C. Lentz, Luke Cadriel, Ronald W. Barnett, Jamie P. Brooks, Bruce E. Young, Jr., Dianna Y. O'Brien, Christopher T. Watts, Jorge Alvarado, Rickey K. Ladet, Aaron Li, Matthew E. Smith, Matthew Ivie, Rebecca M. Rodriguez, William T. Callahan, and FNU Karg.

8. Defendants John and Jane Does 1 through 50 are additional unknown officers, deputies, investigators, prosecutors, and officials of Williamson County who participated in the acts alleged herein. Their true identities will be substituted as discovery progresses. This includes persons involved in reports and actions connected to Isolde Amador-Melendez and persons who participated in the creation or use of fabricated evidence.

IV. FACTUAL ALLEGATIONS

9. Plaintiff was subjected to multiple arrests and detentions in Williamson County based on reports that were false or lacked probable cause, including actions involving Isolde Amador-Melendez and Williamson County law enforcement officers.

10. While detained in the Williamson County Jail, Plaintiff was denied adequate medical care for his known disabilities of legal blindness and permanent nerve damage. Jail personnel were deliberately indifferent to these serious medical needs.

11. In the attorney-client meeting rooms at the Williamson County Jail, there are no telephones. Instead, the rooms contain camouflaged audio and video recording equipment disguised as smoke alarms. This was confirmed in conversations with jail personnel (Nathan and Derrick), who stated that the contractors used cheap equipment for the smoke alarms that contained audio and video recording capability. The same type of equipment is installed throughout the jail and even in the halls of the courthouse. These devices recorded privileged attorney-client communications.

12. These secret recordings violated Plaintiff’s right to confidential communications with counsel under the Sixth and Fourteenth Amendments.

13. All NCIC inmate telephones at the Williamson County Jail recorded telephone calls. The system segregated calls by code and fed the recordings into an artificial-intelligence system for analysis. This practice applied to Plaintiff’s calls and was conducted without adequate notice or consent regarding the AI analysis component. The recording and AI analysis went beyond ordinary jail monitoring.

14. Williamson County officials took at least one recorded conversation from the NCIC phone system and fabricated a false document based on that conversation. The fabricated

document was then placed into evidence or used against Plaintiff in Williamson County criminal proceedings.

15. Williamson County officials, including District Attorney Shawn Dick, Sheriff Matthew Lindemann, and Sheriff's Office personnel, included expunged information and false charges in proceedings and reports concerning Plaintiff. This includes reference to a January 16, 2000 Carmel PD Theft (Felony) charge from Indiana (status unknown) and a January 27, 2026 Williamson County Sheriff's Office Violation of Bond/Protective Order (Misdemeanor A) that was pending. These materials were used despite their expunged or false character.

16. Plaintiff's former criminal defense attorney, Amber Vasquez of Vazquez Law Firm, is in possession of the complete client file containing evidence of the fabricated or false documentation that was placed into the Williamson County criminal proceedings against Plaintiff, including the document fabricated from the NCIC phone recording, communications, and other materials relevant to the expunged and false charges.

17. These actions by the District Attorney, Sheriff, individual officers connected to reports by Isolde Amador-Melendez, and the fabrication of evidence from NCIC recordings were part of a pattern or practice and contributed to false arrests, malicious prosecution, and other constitutional violations.

18. The policies, customs, and practices of Williamson County—including the use of the NCIC system with AI analysis, the installation and use of hidden recording devices in attorney-client rooms, and the use of fabricated or expunged materials—were the moving force behind the constitutional violations.

19. Additional facts supporting the claims will be supplemented as the full client file from prior counsel and other evidence becomes available.

V. CLAIMS FOR RELIEF

20. Count 1: False Arrest / False Imprisonment under the Fourth and Fourteenth Amendments. Defendants arrested and detained Plaintiff without probable cause based on false reports, fabricated evidence, and expunged records.

21. Count 2: Malicious Prosecution under the Fourth and Fourteenth Amendments. Defendants initiated or continued criminal proceedings against Plaintiff without probable cause, with malice, and based on fabricated and false materials.

22. Count 3: Denial of Medical Care under the Eighth and Fourteenth Amendments. Defendants were deliberately indifferent to Plaintiff's serious medical needs arising from his legal blindness and permanent nerve damage.

23. Count 4: Violation of the Right to Confidential Attorney-Client Communications under the Sixth and Fourteenth Amendments. Defendants recorded privileged communications in attorney-client meeting rooms using camouflaged equipment.

24. Count 5: Unlawful Recording and Artificial-Intelligence Analysis of Inmate Telephone Calls under the Fourth Amendment. Defendants systematically recorded Plaintiff's calls, subjected them to AI analysis, and used the recordings to create fabricated evidence.

25. Count 6: Use of Expunged Records and False Charges under the Fourteenth Amendment. Defendants knowingly used expunged information and false charges against Plaintiff in violation of due process.

26. Count 7: Fabrication of Evidence from NCIC Phone Recordings under the Fourteenth Amendment. Defendants took a recorded conversation from the NCIC system, fabricated a false document from it, and used that document against Plaintiff.

27. Count 8: Municipal Liability against Williamson County under 42 U.S.C. § 1983 (Monell). The constitutional violations were caused by the County's policies, customs, or practices regarding the NCIC/AI system, hidden recording devices, and the use of fabricated or expunged materials.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for:

a. Compensatory and punitive damages against the individual Defendants in their individual capacities;

b. Compensatory damages against Williamson County;

c. Declaratory and injunctive relief;

d. An order requiring production of the complete client file held by Amber Vasquez / Vazquez Law Firm that contains the fabricated documents and related evidence;

e. Costs and such other relief as the Court deems just and proper.

Respectfully submitted,

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Leroy Nellis, Pro Se
[home address redacted]
[telephone redacted]
[email redacted]

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.