

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

RYAN PALMER AND MERCEDES THOMPSON,

Plaintiffs,

v.

Case No: 3:26-cv-766

JEFFERSON COUNTY, JEREMIAH PLEESTER, AND
LOGAN DAHNERT,

Defendants.

COMPLAINT

Plaintiffs Ryan M. Palmer and Mercedes Thompson, by their lawyers, Strang Bradley, LLC, for their complaint against Defendants, state:

INTRODUCTION

1. On July 21, 2025, Defendants Jeremiah Pleester and Logan Dahnert – both deputies with the Jefferson County Sheriff's Office – stopped the car that Plaintiff Ryan Palmer was driving. Plaintiff Mercedes Thompson was in the front passenger seat.

2. The stated reason for the stop was that the car's high-mounted brake lamp wasn't working.

3. Defendants spoke to Palmer and Thompson, obtained information from them, and returned to their shared squad car.

4. In the squad car, Defendant Pleester prepared a citation and printed it out.

5. With the citation in his hand, Defendant Pleester sat idly with Defendant Dahnert, unreasonably delaying the stop while they waited for a drug-sniffing dog, in blatant violation of Palmer and Thompson's Fourth Amendment rights.

JURISDICTION AND VENUE

6. Plaintiffs bring this action under 42 U.S.C. § 1983 to redress the deprivation under color of law of Plaintiffs' rights as secured by the United States Constitution.

7. This Court has jurisdiction over federal claims under 28 U.S.C. § 1331 and the state law claim for indemnification under 28 U.S.C. § 1367.

8. Defendant Jefferson County is a political subdivision of the State of Wisconsin located within this judicial district. Additionally, the events giving rise to the claims occurred in this judicial district.

9. Venue within this judicial district is proper under 28 U.S.C. § 1391(b).

PARTIES

10. Plaintiffs Ryan Palmer and Mercedes Thompson are residents of the State of Wisconsin.

11. Defendant Jefferson County is a political subdivision of the State of Wisconsin and was the employer of the individual Defendants, Jeremiah Pleester and Logan Dahnert, at the time of the occurrences giving rise to this lawsuit.

12. Jefferson County is required to pay any tort judgment for damages for which its employees are liable for acts within the scope of their employment pursuant to WIS. STAT. § 895.46.

13. At all times relevant to the conduct complained of in this action, Jeremiah Pleester and Logan Dahnert were Jefferson County Sheriff's Deputies.

14. At all times that Defendants Pleester and Dahnert interacted with Plaintiffs on July 21, 2025, Pleester and Dahnert acted under color of state and local law.

15. At all times that Defendants Pleester and Dahnert interacted with Plaintiffs on July 21, 2025, Pleester and Dahnert acted within the scope of their employment with the Jefferson County Sheriff's Office.

FACTS

16. On July 21, 2025, Defendants Pleester and Dahnert violated Plaintiffs' rights by unlawfully seizing them.

17. That day, Palmer was driving eastbound on US Highway 12 just outside Fort Atkinson. He was heading with Thompson, his passenger, to see Thompson's son.

18. Pleester was heading in the opposite direction and executed a U-turn to follow Palmer's car.

19. Pleester stopped Palmer's car at about 9:46 AM.

20. Pleester approached the passenger side of the vehicle and spoke with Palmer and Thompson.

21. While Pleester spoke with Palmer and Thompson, Dahnert stood at the driver's side door. At one point, he reached through the open window into the car to shine his flashlight toward the base of the door.

22. After discussing the reason for the stop and obtaining identification from both Palmer and Thompson, Pleester and Dahnert returned to the squad car at about 9:49 AM.

23. Pleester and Dahnert briefly discussed their interactions before both muted their body-worn cameras.

24. Pleester worked on his in-squad computer and printed a citation at about 10:03 AM.

25. At no point did Defendants have reasonable suspicion of criminal activity independent of the traffic violation that would justify extending the stop.

26. From approximately 10:03 AM to 10:13 AM, Pleester and Dahnert sat idly in the squad car, with the citation completed in Pleester's hand.

27. Pleester and Dahnert got out of their car only when a drug-sniffing dog arrived.

28. Palmer was later arrested and Defendants drove Thompson to a nearby gas station. Later, their car was towed.

COUNT I:

42 U.S.C. § 1983 Claim for Illegal Seizure for Extending Traffic Stop

29. Plaintiffs reallege the above paragraphs.

30. Defendants Pleester and Dahnert unlawfully extended the seizure of Plaintiffs Palmer and Thompson by waiting for a drug-sniffing dog to arrive after they finished their original mission of the traffic stop and issuing a traffic ticket.

31. In doing so, Defendants Pleester and Dahnert violated Plaintiffs' Fourth Amendment right to be free from unreasonable seizure. As a direct and proximate result,

Plaintiffs suffered damages including loss of liberty, emotional distress, humiliation, and other injuries.

WHEREFORE, pursuant to 42 U.S.C. §§ 1983 & 1988, Plaintiffs demand actual or compensatory damages against Defendants Pleester and Dahnert, and because they acted in reckless disregard for Plaintiffs' rights, punitive damages, plus the costs of this action, attorneys' fees, and such other relief that the Court deems just and equitable.

COUNT II:
42 U.S.C. § 1983 Claim for Illegal Search

32. Plaintiffs reallege the above paragraphs.

33. Defendant Dahnert unlawfully searched Plaintiff Palmer's car by reaching his hand inside the window while standing beside the driver's door. He had no probable cause to enter and search the car, no consent, no warrant, and no applicable exception to the warrant requirement.

34. In doing so, Defendant Dahnert violated Plaintiff's Fourth Amendment right to be free from unreasonable searches. As a direct and proximate result, Plaintiff suffered damages including loss of liberty, emotional distress, humiliation, and other injuries.

WHEREFORE, pursuant to 42 U.S.C. §§ 1983 & 1988, Plaintiffs demand actual or compensatory damages against Defendant Dahnert, and because he acted in reckless disregard for Plaintiffs' rights, punitive damages, plus the costs of this action, attorneys' fees, and such other relief that the Court deems just and equitable.

**COUNT III:
Indemnification Claim Against Jefferson County**

35. Plaintiffs reallege the above paragraphs.

36. Wisconsin law, WIS. STAT. § 895.46, requires public entities to pay any tort judgment for damages for which employees are liable for acts within the scope of their employment.

37. At all times relevant to this action, Defendants Pleester and Dahnert were engaged in the conduct complained of while they were on duty and in the course and scope of their employment with Jefferson County.

WHEREFORE, Plaintiffs ask this Court to find that Jefferson County is liable to defend this action against Defendants Pleester and Dahnert and to satisfy any judgment entered against them, by virtue of WIS. STAT. § 895.46.

JURY DEMAND

Plaintiffs hereby demand a trial by jury, pursuant to FED. R. CIV. P. 38(b), on all issues so triable.

Respectfully submitted,

Dated: 17 August 2026,

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