

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

TAYLER GRUBB and JOSEPH MARRERO,	)	
on their own behalf and on behalf of	)	
a class of those similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:26-cv-01460-JPH-TAB
	)	
MONROE COUNTY COUNCIL,	)	
MONROE COUNTY COMMISSIONERS, in	)	
their official capacities, and	)	
MONROE COUNTY SHERIFF, in his official	)	
capacity,	)	
	)	
Defendants.	)	

**MONROE COUNTY COMMISSIONERS'S AND MONROE COUNTY SHERIFF'S
PRELIMINARY WITNESS & EXHIBIT LIST**

Come now the Monroe County Commissioners and the Monroe County Sheriff, by counsel, and provide their Preliminary Witness & Exhibit List:

I. Witnesses

1. Sheriff Ruben Marté – c/o the undersigned attorney

Sheriff Marté has knowledge of the physical condition of the Monroe County Correctional Center, including the fact that: (1) is an aging facility that has exceeded both its structural and functional life expectancy; (2) has a multi-story/linear design which is staff-intensive and imposes significant operational challenges; and (3) does not have a sufficient number of permanent beds to meet the County's current and projected future needs. He also has knowledge of the efforts made by the County to remedy these issues.

2. Monroe County Jail Commander Kyle Gibbons – c/o the undersigned attorney

Jail Commander Gibbons has knowledge of the physical condition of the Monroe County Correctional Center, including the fact that: (1) is an aging facility that has exceeded both its structural and functional life expectancy; (2) has a multi-story/linear design which is staff-intensive and imposes significant operational challenges; and (3) does not have a sufficient number of permanent beds to meet the County's current and projected future needs. He also has knowledge of the efforts made by the County to remedy these issues.

3. Assistant Jail Commander Matthew Demmings – c/o the undersigned attorney

Assistant Jail Commander Demmings has knowledge of the physical condition of the Monroe County Correctional Center, including the fact that: (1) is an aging facility that has exceeded both its structural and functional life expectancy; (2) has a multi-story/linear design which is staff-intensive and imposes significant operational challenges; and (3) does not have a sufficient number of permanent beds to meet the County's current and projected future needs. He also has knowledge of the efforts made by the County to remedy these issues.

4. Chief Deputy Phil Parker – c/o the undersigned attorney

Chief Deputy Parker has knowledge of the physical condition of the Monroe County Correctional Center, including the fact that: (1) is an aging facility that has exceeded both its structural and functional life expectancy; (2) has a multi-story/linear design which is staff-intensive and imposes significant operational challenges; and (3) does not have a sufficient number of permanent beds to meet the County's current and projected future needs. He also has knowledge of the efforts made by the County to remedy these issues.

5. Julie Thomas, Jody Madeira, and Lee Jones – c/o the undersigned attorney

Thomas, Madeira, and Jones have knowledge of the physical condition of the Monroe County Correctional Center, including the fact that: (1) is an aging facility that has exceeded both its structural and functional life expectancy; (2) has a multi-story/linear design which is staff-intensive and imposes significant operational challenges; and (3) does not have a sufficient number of permanent beds to meet the County's current and projected future needs. They also have knowledge of the efforts made by the County to remedy these issues.

6. Jennifer Crossley, Peter Iverson, Kate Wiltz, Marty Hawk, Trent Deckard, Liz Feitl, and David G. Henry – c/o their counsel of record

These individuals are believed to have knowledge of the physical condition of the Monroe County Correctional Center, including the fact that: (1) is an aging facility that has exceeded both its structural and functional life expectancy; (2) has a multi-story/linear design which is staff-intensive and imposes significant operational challenges; and (3) does not have a sufficient number of permanent beds to meet the County's current and projected future needs. It is also believed that these individuals have knowledge of the efforts made by the County to remedy these issues.

7. Tayler Grubb – c/o his counsel of record

Grubb is believed to have knowledge of the physical condition of the Monroe County Correctional Center and his personal experience as an inmate therein.

8. Joseph Marrero – c/o his counsel of record

Marrero is believed to have knowledge of the physical condition of the Monroe County Correctional Center and his personal experience as an inmate therein.

9. Jeff Groh – c/o Indiana Department of Correction, 302 W. Washington St, Ste. E-334, Indianapolis, IN 46204 (317) 233-6984

Groh is a State Jail Inspector. He is believed to have knowledge of the physical condition of the Monroe County Correctional Center, including the fact that: (1) is an aging facility that has exceeded both its structural and functional life expectancy; (2) has a multi-story/linear design which is staff-intensive and imposes significant operational challenges; and (3) does not have a sufficient number of permanent beds to meet the County's current and projected future needs.

10. Eve L. Hill – c/o Inclusivity Strategic Consulting, 1717 K Street N.W., Suite 900, Washington, DC 20006

Hill prepared the Strengths Assessment and Gap Analysis dated "April 2021".

11. Kenneth Ray – c/o RJS Services, P.O. Box 1481 Ashland, Ky 411985 (606) 694-3031

Ray assisted in the preparation of the 2020 Criminal Justice & Incarceration Study Final Report dated June 20, 2021.

12. Dr. Allen R. Beck – c/o Justice Concepts, Inc., 417 E. 87th Place, Kansas City, MO. (812) 361-1711

Beck assisted in the preparation of the 2020 Criminal Justice & Incarceration Study Final Report dated June 20, 2021.

13. Any former Monroe County Commissioner with knowledge of the physical condition of the Monroe County Correctional Center and the efforts made by the County to remedy the problems associated therewith.

14. Any former member of the Monroe County Council with knowledge of the physical condition of the Monroe County Correctional Center and the efforts made by the County to remedy the problems associated therewith.

15. Any former or current jail officer working in the Monroe County Correctional Center with knowledge or information about the conditions under which jail officers work and perform their jobs.

16. Any yet-to-be identified experts, including but not limited to experts in the area of jail operation and management, jail staffing, census data, and population growth.

17. Any persons who have been involved in identifying suitable locations for the construction of a new Monroe County jail.

18. Any records custodians and other persons needed to authenticate or refute the authenticity of any document or thing.

19. Any persons needed for purposes of impeachment or rebuttal.

20. Any other persons with knowledge or information relevant to any party's claims or defenses whose identities are discovered or revealed in the course of on-going discovery.

II. Exhibits

1. Blue-prints, diagrams, sketches, floor plans, and other visual depictions of the Monroe County Correctional Center.

2. Photos and video of the condition of the Monroe County Correctional Center, including but not limited to the intake/booking area, holding cells, general population housing units, individual cells, the medical unit, the kitchen, the laundry room, classrooms, and recreation areas.

3. A portable bed or "boat" for demonstrative purposes.

4. A jail mattress for demonstrative purposes.

5. State Jail Inspection Reports.

6. Historical inmate population data.

7. Daily inmate population data.
8. Monroe County, Indiana, Criminal Justice Project, “Strength Assessment & Gap Analysis” prepared by Eve L. Hill with Inclusivity Strategic Consultants dated “April 2021)
9. RQAW Monroe County Justice Study (*a/k/a* Feasibility Study Full Report);
10. RQAW (*a/k/a* Feasibility Study Summary Report);
11. Final Justice Center Requirements and Preferences;
12. Duke Discussions;
13. Commissioners Critical Questions to Council November 2025;
14. 2026 Property Timelines;
15. First Appraisal Group NP (North Park);
16. Advisio Appraisal NP (North Park);
17. Resolution 2026-09 -- Regarding Justice Project Location;
18. Resolution 2026-02 -- Renewing MC Council’s Commitment regarding a new jail facility;
19. Ordinance 2022-44 -- Adopting the County Economic Development Income Tax Capital Improvement Plan for Monroe County, Indiana;
20. Ordinance 2024-42 -- Modifying Local Income Tax Rates;
21. Ordinance 2024-54 – An Ordinance to Approve and Fix Terms and Conditions for the Purchase of Land-North Park;
22. Ordinance 2022-47 – An Ordinance to Approve and Fix Terms and Conditions for the Purchase of Fullerton;
23. Location Comparison (prepared by JE, Monroe Co. GIS Division on March 8, 2022;

24. Presentation Monroe County Jail Site Evaluation Matrix and Analysis Drawings (revised 8/29/2024);

25. 11-22-2024 -- North Park Sketches A-C Combined;

26. 11-22-2024 -- Vernal Pike Analysis;

27. 11-22-2024 -- Vernal Pike Concept Sketches;

28. 11-22-2024 North Park-Vernal Pike 1 Mile Radius;

29. 8-19-2025 -- 2025-08-19 Schematic Design Phase Presentation;

30. 8-19-2025 -- Monroe County Report;

31. 2-13-2026 -- Property Within the City Limits;

32. Any minutes of meetings of the Monroe County Commissioners documenting discussions about the Monroe County Correctional Center and matters relevant to any of the parties' claims and defenses in this matter;

33. Any minutes of meetings of the Monroe County Council documenting discussions about the Monroe County Correctional Center and matters relevant to any of the parties' claims and defenses in this matter;

34. Any documents reflecting requests made by the Monroe County Sheriff's Office for repairs, renovations, upgrades, and remediation work to be done in the Monroe County Correctional Center;

35. Contracts, invoices, estimates, receipts, proof of payment and other similar documents reflecting repairs, renovations, upgrades, and remediation work done in the Monroe County Correctional Center;

36. Verified Petition to Transfer Inmates filed in Cause No. 53C04-2608-MI-002164;

37. Any documents and things produced by the Monroe County Commissioners and/or Monroe County Sheriff in connection with this action;

38. Any documents and things produced by the Monroe County Council in connection with this action;

39. Any documents and things produced by Plaintiffs in connection with this action;

40. Any depositions that are taken in connection with this action, including the exhibits thereto;

41. Any documents necessary to authenticate or refute the authentication of any other document or thing;

42. Any documents or things necessary for impeachment or rebuttal.

43. Any summary exhibits, including but not limited to summaries of HVAC breakdowns, flooding incidents, and other major facility maintenance events and the expenses associated therewith;

44. Any other documents or things relevant to any party's claims or defenses that is revealed in the on-going course of discovery.

Respectfully submitted,

CLARK JOHNSON & KNIGHT, LTD.

/s/ Pamela G. Schneeman

Pamela G. Schneeman, Atty No. 18142-53

*Attorney for Monroe County Commissioners and
Monroe County Sheriff*

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CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2026, a copy of the foregoing MONROE COUNTY COMMISSIONERS'S AND MONROE COUNTY SHERIFF'S PRELIMINARY WITNESS & EXHIBIT LIST was served by email to the following:

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/s/ Pamela G. Schneeman
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