

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
AT FORT MYERS FLORIDA

HANNAH KIDWELL,
(VA Caregiver for Disabled Veteran, Billy
Kidwell, and his Daughter),
Plaintiff

And

BILLY RAY KIDWELL,
(an Elderly, 100% Service-Connected, ADA
Qualified, Disabled Vietnam Veteran),
Plaintiff

v.

WALMART INC.
(a Public Accommodation)

And

DOUG MCMILLON
PRESIDENT AND CEO OF WALMART
INC. (in both his Official and Personal
Capacity)

And

KAREN ROBERTS
GENERAL COUNSEL OF WALMART INC.
(in both her Official and Personal Capacity)

And

CHANEL BARGHAUSEN
C/O MANAGER OF KINGS HIGHWAY
WALMART (in both her Official and Personal
Capacity)
375 Kings Highway
Port Charlotte, FL. 33983

And

Case No.

2:21-CV-517-SPC-MRM

42 U.S.C. §1983 CIVIL RIGHTS

COMPLAINT FOR DAMAGES,

INCLUDING PUNITIVE DAMAGES,

AND/OR, DECLARATORY

AND INJUNCTIVE RELIEF

JURY TRIAL DEMANDED

42 U.S.C. §1983

FIRST, FIFTH, AND FOURTEENTH,
AMENDMENTS

AMERICANS WITH DISABILITIES ACT

FLORIDA STATUTES F.S. §825.102 AND
F.S. 413.08(4)

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CLERK OF DISTRICT COURT
JULY 20 2021
TALLAHASSEE, FLORIDA

LARRY COULTAS
WALMART LOSS PREVENTION OFFICER :
(in both his Official and Personal Capacity) :
C/O Kings Highway Walmart :
375 Kings Highway :
Port Charlotte, FL. 33983 :

And :

BILL PRUMMELL :
CHARLOTTE COUNTY FLORIDA :
SHERIFF (in both Official, and Personal :
Capacity) :

And :

“UNKNOWN CHARLOTTE COUNTY :
SHERIFF’S DEPUTIES” (in both their :
Official, and Personal Capacities) :

I. INTRODUCTION

Walmart is too big, too powerful, and is out of control, with no respect for the Disabled, and no respect for the Constitutional, and Statutory Rights of the Disabled, or Disability Laws.

Defendant, *Doug McMillion*, was President, and CEO, of Walmart International, when Walmart used TPI’s to bribe Government Officials in India, Mexico, and all over the world, destroying America’s Image, making us look like a Corporate Gangster Nation.

In 2013 Walmart was fined \$110 Million for endangering the public, dumping Hazardous Waste in city trash bins, and sewer systems, in Los Angeles, and San Francisco.

In 2019 Walmart was fined \$144 Million by the FEC, and another \$138 Million by the United States Department of Justice, for violating the Foreign Corrupt Practices Act, a small drop in the bucket considering how much Walmart made violating laws around the world.

Walmart advertised all over America that it was hiring 100,000 Veterans in a five-year period, trying to fraudulently look patriotic.

Walmart concealed that they were really hiring Veterans, to PROFIT off Veterans, by getting **over \$560 Million dollars in tax credits** .

Recently a jury awarded a Walmart Employee of 16 years, *with Down Syndrome*, over \$125 Million Dollars, for how inhuman Walmart treated the Disabled Employee, even firing him for being Disabled.

Walmart responded with a snotty remark about how the amount will be reduced to \$30,000, instead of being remorseful about how inhuman, Walmart treated, a Disabled, Loyal Employee.

Plaintiffs, *Hannah Kidwell*, and *Billy Kidwell*, come before this Court because Walmart is evil, has been operating in Florida, the way it operates around the world, without morals, or ethics, abusing the Poor, and Disabled, while Violating Laws.

Plaintiffs described Walmart's recent "*conduct*" above, because they prove that despite Hundreds of Millions of Dollars in fines, and Punitive Damages, Walmart is so rich, and so powerful, that those amounts have not been sufficient, *or even close to being large enough*, to deter, or change, the inhuman way Walmart disrespects laws, and abuses the Disabled, and the Vulnerable, in America.

Walmart CEO *Doug McMillion*, has never served in the military.

He has extremely strong ties to China. He serves on the board of the U.S.-China Business Council, and on the Advisory Board of the Tsinghua University School of Economics, and Management, in Beijing China.

Doug McMillion is training Chinese for the good Walmart Jobs, **not America's Veterans.**

Doug McMillion directly employs 96,800 people in China to operate 357 Chinese Walmart Stores.

Walmart's Supply Chain in China includes 30,000 factories, employing over 15 million Chinese, that make OVER 70 % of all the goods Walmart sells, *which explains why Americans don't have good jobs*, they are in China.

Walmart has greatly exceeded the inhuman way it treated its Employee with *Down Syndrome*, with the many blatant Crimes, Walmart knowingly, and intentionally committed, against *Billy Kidwell*, and his daughter, *Hannah Kidwell*, in this case, with Massive Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of both Plaintiff's Constitutional, and Statutory Rights.

Walmart CEO, and President, *Doug McMillion*, and the General Counsel of Walmart, *Karen Roberts*, who is directly responsible for Walmart's Conduct, were both personally NOTIFIED, over, and over, again, that *Billy Kidwell*, an Elderly, Severely Disabled Vietnam Veteran, and his daughter, *Hannah Kidwell*, were assaulted by Walmart Employees at the Kings Highway Walmart Store in Port Charlotte Florida, to punish *Billy Kidwell* for needing, and using, P.T.S.D. Service Dogs.

Walmart CEO, and President, *Doug McMillion*, and the General Counsel of Walmart, *Karen Roberts*, were informed, and provided evidence, that their Store Manager, *Chanel Barghausen*, and Walmart Loss Prevention Officer, *Larry Coultas*, at the Kings Highway Walmart Store, conspired with the Charlotte County Sheriff's Department, to suborn Perjury, commit Perjury, Falsify the Sheriff's Incident Report, (to cover up the attack on *Billy Kidwell*, and to fraudulently trespass *Billy Kidwell* for being disabled, and his daughter, *Hannah Kidwell*, for being his VA Caregiver), while concealing video of the incident, and hiding the Key Witnesses, a Black, Female, Walmart Manager named "*Handy*".

This never-ending Walmart Policy of lawlessness, and abuse of the Severely Disabled, will never end until Punitive Damages are awarded, in an Amount that will get the attention of the CEO, and General Counsel, of Walmart, and will actually DETER their appalling inhuman conduct.

THEREFORE, this Civil Rights Lawsuit, seeking damages for the Deprivation of Rights, and Privileges, secured by the Constitution, and Laws, Under Color of State Law, for Walmart conspiring with local law enforcement, seeks Punitive Damages of not less than \$250 Million Dollars, **Pro Bono Publico**.

II. JURISDICTION AND VENUE

1. This is an action for Injunctive Relief, Compensatory Damages, Damages for Emotional Distress, and Punitive Damages, pursuant to 42 U.S.C. §1983 based upon violations, and continuing violations, of Plaintiff(s) Rights, under the First, Fifth, and Fourteenth Amendments to the United States Constitution, and the violation of Plaintiff(s) Statutory Disability Rights, with Massive Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff's Rights.

2. Jurisdiction exists pursuant to 28 U.S.C. §1331, and §1343, based on 42 U.S.C. §1983, questions of Federal Constitutional Law, and the Intentional Deprivation, "*Under Color of State Law*", of Rights, Privileges, or Immunities, secured by the Constitution, and Laws, with Massive Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff's Constitutional, and Statutory Rights.

3. Jurisdiction also exists under the Declaratory Judgment Act, 28 U.S.C. §§2201(a), and 2202.

4. Title 42 U.S.C. §1983 authorizes Punitive Damages, and this case greatly exceeds all Jurisdictional Requirements for Punitive Damages, which are necessary, given the facts herein, to punish, and deter the Defendants from further Intentional, and Massive Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff's Constitutional, and Statutory Rights, that shocks the conscience.

5. Supplemental Jurisdiction over Plaintiff's State Law Claims exists pursuant to 28 U.S.C. §1367.

6. Plaintiff(s) live in Port Charlotte, Florida and venue is proper in the United States District Court at Fort Myers.

III. JURY TRIAL DEMAND

7. Plaintiff(s) demand a jury trial.

IV. PARTIES

8. Plaintiff, *Hannah Kidwell*, is an individual and resident of Port Charlotte, Florida. She is a VA Caregiver, and Medical Care Assistant, to her father, *Billy Kidwell*, who is a 100% Service-Connected Disabled Vietnam Combat Veteran. Her address is 5064 Silver Bell Drive, Port Charlotte, Florida.

9. Plaintiff, *Billy Kidwell*, is an elderly, seventy-two (72) Year-Old, 100% Service-Connected, Disabled Vietnam Veteran who is dying from Heart Failure.

10. *Billy Kidwell* has a severe back injury from a Rocket Attack in Vietnam, Pre-Cancer from Agent Orange, Insomnia, Combat Nightmares, Depression, and Anxiety Attacks caused by an Extremely Severe Post-Traumatic Stress Disorder¹, and excessive combat, where *Kidwell* was in villages, *by himself*, working Local Nationals, in far more danger than other soldiers in his battalion.

¹ Post-Traumatic Stress Disorder is hereinafter referred to as simply "P.T.S.D."

11. *Billy Kidwell's* P.T.S.D. has caused him to suffer Stress-Caused Stomach Problems, and Stress-Caused Bleeding Ulcers, Stress-Caused Heart Problems, and Stress-Caused Heart Attacks, that caused so much damage to *Kidwell's* Heart, that he is now dying from Heart Failure.

12. *Billy Kidwell* has one side numb, and one leg numb, from his Combat Back Injury, and needs a VA Walker to walk, or has to lean on a Shopping Cart to shop.

13. *Billy Kidwell* is **Medically Unable to Stand Stress**, and needs two (2) Small Japanese Chin, P.T.S.D. Service Dogs, *when in public*, to protect, and calm him during P.T.S.D. Anxiety Attacks.

14. *Billy Kidwell* is an individual and resident of Port Charlotte, Florida. His address is 5064 Silver Bell Drive, Port Charlotte, Florida.

15. Defendant, *Walmart Inc.*, is a Public Accommodation, that at all times was acting Under Color of State Law. Walmart is sued in its Official, and Individual Capacities. This Defendant's address is, Walmart, C/O Walmart General Counsel, 702 Southwest 8th Street, Bentonville, AR 72716.

16. Defendant, *Doug McMillon*, President, and CEO of Walmart, Inc., at all times was acting Under Color of State Law is being sued in his Official, and Individual Capacities. Plaintiff(s) seek Declaratory, Injunction, Actual, and Compensatory, money damages, in an amount to make Plaintiff(s) whole, from this Defendant, and seek Punitive Damages, to punish, and deter further Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff's Constitutional, and

Statutory Rights. This Defendant's address is, *Doug McMillon*, President & CEO, Walmart, 702 Southwest 8th Street, Bentonville, AR 72716.

17. Defendant, *Karen Roberts*, General Counsel of Walmart, Inc., at all times, was acting Under Color of State Law, and is being sued in her Official, and Individual Capacities. Plaintiff(s) seek Declaratory, and Injunction Relief, from this Defendant, and Actual, and Compensatory, Money Damages, in an amount to make Plaintiff(s) whole. Plaintiff(s) seek Punitive Damages, from this Defendant to punish, and deter her from further Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff's Constitutional, and Statutory Rights. This Defendant's address is: *Karen Roberts*, General Counsel, Walmart, 702 Southwest 8th Street, Bentonville, AR 72716.

18. Defendant, *Chanel Barghausen*, at all times herein, was a Store Manager at the Kings Highway Walmart in Port Charlotte Florida. She conspired with the Charlotte County Sheriff's Department, to violate the rights of *Billy Kidwell*, and *Hannah Kidwell*, Under Color of State Law. Her address is, *Chanel Barghausen*, C/O King's Highway Walmart, 375 Kings Highway, Port Charlotte, Florida 33983.

19. Defendant, *Larry Coultas*, at all times herein, was a Walmart Loss Prevention Officer at the Kings Highway Walmart in Port Charlotte Florida. He conspired with, (and may even be an employee of) the Charlotte County Sheriff's Department, to violate the rights of *Billy Kidwell*, and *Hannah Kidwell*, Under Color of State Law. His address is, *Larry Coultas*, C/O King's Highway Walmart, 375 Kings Highway, Port Charlotte, Florida 33983.

20. Defendant, *Bill Prummell, Charlotte County Sheriff* at all times was acting Under Color of State Law. This Defendant is sued in his Official, and Individual Capacity for Declaratory, Injunction Relief, and Compensatory Damages in an amount to make Plaintiff(s) whole, and Punitive Damages, to punish, and deter this Defendant from further Massive Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff's Constitutional, and Statutory Rights. This defendant's address is: *Bill Prummell, Charlotte County Sheriff, William H. Reilly Administration Building, 7474 Utilities Road, Punta Gorda, Fl. 33982.*

21. Defendant, "*Unknown Charlotte County Sheriff's Deputies*" at all times were acting Under Color of State Law, and are sued in both their Official, and Individual Capacity. These Defendants will be named when their names are discovered with Discovery. This defendant consists of Unknown Charlotte County Sheriff's Officers at the incident at Walmart on Kings Highway on July 20, 2017, that is described herein, and any, and all, other Charlotte County Sheriff Employees, involved in violating the rights of Billy Kidwell, and/or Hannah Kidwell, in regards to the incident on July 20, 2017, and/or this lawsuit. This Defendant's Address is "*Unknown Charlotte County Sheriff's Deputies*", c/o William H. Reilly Administration Building, 7474 Utilities Road, Punta Gorda, Fl. 33982.

V. STATEMENT OF FACTS

22. In May of 2017 *Billy Kidwell's* VA Doctors directed *Billy Kidwell* to try using P.T.S.D. Service Dog(s), since for the past forty (40) years, none of the VA's Treatments, Medications, and/or Counseling, had worked for *Billy Kidwell's* extremely severe P.T.S.D., and *Billy Kidwell's* constant P.T.S.D. Anxiety Attacks.

23. After extensive research *Billy Kidwell* discovered that small Japanese Chins were most appropriate for his P.T.S.D., however they are shy, and work best in pairs, so *Billy Kidwell* searched, and found two (2) small Japanese Chins, and trained them to assist him in avoiding P.T.S.D. Anxiety Attacks, and to calm him during P.T.S.D. Anxiety Attacks.

24. Billy Kidwell has Billy Kidwell started using his two (2) small P.T.S.D. Service Dogs, and found that they helped him avoid P.T.S.D. Anxiety Attacks, and calmed him during P.T.S.D. Anxiety Attacks, helping him to safely function in public, without fear of Stress-Caused Bleeding Ulcers, or Stress-Caused Heart Problems, and/or Heart Attacks.

25. Billy Kidwell has a Mobility Disability in that one side, and his left leg is numb, and he has severe back pain, and can barely walk because of a Rocket Attack in Vietnam.

26. The VA issued Billy Kidwell a cane for very short distances, and a VA Walker, however Billy Kidwell also needs his P.T.S.D. Service Dogs to avoid Stress-Caused Problems, including Stress-Caused Bleeding Ulcers, and Stress-Caused Heart Problems, including Stress-Caused Heart Attacks, and to calm him during Stress-Caused P.T.S.D. Anxiety Attacks.

27. The only way Billy Kidwell can shop, unable to walk, and needing P.T.S.D. Service Dogs, is to put the Service Dogs in a Shopping Cart, and to lean on the Shopping Cart, when shopping.

28. While Walmart has no problem with Pet Dogs in Shopping Carts, Walmart does not allow Service Dogs in Shopping Carts. [See Exhibit A.]

(a) The Shopping Cart Con-Game by Walmart

29. The Public Accommodation, Walmart, is involved in a dishonest scheme to discriminate against Plaintiff, and other Disabled Veterans, needing to lean on a Shopping Cart to Walk, and needing to put P.T.S.D. Service Animals in their Shopping Cart to safely shop, by fraudulently claiming that some “*Unknown Health Department*” has determined that “*for Health Safety Reasons*”, and/or “*to maintain cleanliness of Shopping Carts*”, that Service Animals may not be placed in Shopping Carts. [See Exhibit A.]

30. Walmart allows cute Pet Dogs to ride in Shopping Carts, and only bans “*Service Animals*”, wearing Service Vests, from their Shopping Carts.

31. Plaintiff’s P.T.S.D. Service Dogs are as clean as Pet Dogs, and far cleaner than the Shopping Carts they are put in, and the only reason for the discriminatory ban of Service Animals by Walmart, is to discriminate against, and ban Disabled Veterans, needing Service Dogs, from shopping at Walmart.

32. It is Filthy Walmart Shopping Carts, that were never washed, until the COVID 19 Pandemic, that are disease infested, and pose a Very Serious Health Risk, not Plaintiff, *Billy Kidwell’s Service Dogs*.

33. Walmart Shopping Carts are used to carry Car Batteries, Acid, Chemicals of all sorts, Garden Products, like Insect, and Animal Poisons, plants containing poisons, cow manure, rat, and animal poisons, hair dyes, drain cleaners, and many other items that contaminate food, and are dangerous.

34. Walmart engages in the mishandling of Raw Foods, having customers handle poorly packaged, and often leaking, packs of Raw Chicken, contaminating their hands with filth, and disease, from the Raw Chicken, with customers using their hands to place the Raw Chickens in plastic bags, and then handling the Shopping Cart.

35. Walmart Shopping Carts are contaminated by mishandling of Raw Meat, resulting in Shopping Carts having Bacterial Enteric Pathogens, such as Salmonella, Campylobacter, and Escherichia Coli.

36. Walmart leaves their Shopping Carts outside all day, and birds sometimes poop on the Carts, especially the Sea Gulls, which creates an extremely serious Health Risk.

37. Walmart encourages shoppers to put small children in diapers in their Shopping Carts, by providing Shopping Carts with a place for kids in diapers right above the food, resulting in diapers that leak, contaminating the food in the Shopping Cart, with Human Fetal Waste, and Urine, posing an extremely serious Health Risk.

38. Plaintiff, *Billy Kidwell*, has carefully watched the Filthy, Disease-Infested, Shopping Carts at the Walmart in Port Charlotte, Florida, for years, and has not seen Walmart wash one of their Shopping Carts, until the Pandemic.

39. A study was done on Shopping Carts in four (4) states by the University of Arizona.

40. Out of the Shopping Carts tested 72% showed Fecal Bacteria, and over 50% tested positive for E. Coli.

41. The study found Shopping Carts are a serious threat to kids, and the elderly, who are more likely to develop infections, caused by bacteria, such as salmonella.

42. There are cost-effective, Shopping Cart Washing Systems on the market, but Walmart would rather endanger its customers, and cause an extremely serious health risk to the Elderly, the Disabled, and to Small Children, put in their filthy Shopping Carts, then to spend a few dollars to make their Shopping Carts clean, and safe.

43. Since Shopping Cards are constantly handled by different people all day the University of Arizona has found that Shopping Carts are far filthier than the floor of Public Restrooms.

44. Yet Walmart, and Publix, fraudulently claim that putting Service Dogs in their Shopping Carts pose “*a Cleanliness Problem*”.

45. There is no evidence, anywhere, that P.T.S.D. Service Dogs in a Shopping Cart are a “*Health Threat*”, and Walmart Signs stating “*To Maintain Cleanness of Carts, Service Animals may not be placed in Shopping Carts*” is an intentional act of Hateful, Willful, Malice towards Plaintiff, *Billy Kidwell*, and other Disabled Veterans needing to put Service Animals in Shopping Carts to safely shop.

46. Walmart allows babies with Shitty Diapers, Car Batteries, Acid, Chemicals of all sorts, Garden Products, like Insect, and Animal Poisons, plants containing poisons, cow manure, poisons, hair dyes, drain cleaners, and many other items that contaminate food, to be placed in their Shopping Carts, next to food, for a profit.

(b) Statutory Rights, the Americans with Disabilities Act, and Florida Statute(s) F.S. §825.102, and F.S. §413.08(4)

47. The Americans with Disabilities Act (ADA) provides that Dogs that calm a Disabled Veteran, during a P.T.S.D. Anxiety Attack, are always Service Animals.

48. The Rules for Service Animals, set by the United States Department of Justice, state that there is no such thing as registration for Service Animals, and training may be performed by the Disabled Person.

49. United States Department of Justice Rules state that Service Animals are allowed in all areas where the public is allowed to go.

50. United States Department of Justice Rules state that only two questions may be asked when it is not obvious an animal is a Service Animal: (1) Is the dog a Service Animal required because of a disability, and (2) What work, or task, has the dog been trained to perform.

51. The inquiring person cannot ask about the Disabled Person's Disability, require medical documentation, require a Special Identification Card, or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work, or task.

52. Florida Statute F.S. §413.08(4) makes it a crime for "*Any person, firm, or corporation, to deny, or interfere, with admittance to, or the enjoyment of a Public Accommodation by a Disabled Person with a Service Dog*".

53. Florida Statute §825.102 makes it a Felony to "*Intentionally inflict physical, or psychological injury on an elderly, or disabled adult in Florida*".

(c) July 20, 2017

54. *Billy Kidwell* was a victim of sporadic harassment by Walmart when he shopped at their stores.

55. As a direct result of this sporadic harassment Billy Kidwell suffered a Stress-Caused Heart Attack, and was rushed to the Bay Pines VA Hospital, and placed in the Intensive Care Heart Unit for ten (10), where it was discovered, there is massive damage to *Billy Kidwell's* Heart, from the Walmart Induced Heart Attack.

56. A few days after getting off the Intensive Care Unit, at Bay Pines VA Hospital, *Billy Kidwell*, with his daughter, and VA Medical Care Provider, *Hannah Kidwell*, went to the Kings Highway, Port Charlotte, Florida Walmart to shop for dog supplies for *Billy Kidwell's* Service Dogs.

57. Plaintiff, *Billy Kidwell*, parked in the only handicapped parking spot he could find at the Port Charlotte, Florida Walmart, and next to the parking spot were two Walmart Shopping Carts, one with a kid's nasty, leaking, poop-filed diaper in it, and another with a tore half empty bag, of "*Black Cow*" brand Cow Manure.

58. In 2017 Shopping Carts at the Kings Highway Walmart, in Port Charlotte Florida, were always filthy, since they were never cleaned, and it was extremely hard to find a shopping cart without garbage, or a dirty diaper, in it.

59. Plaintiff, *Hannah Kidwell* picked the cleanest Walmart Shopping Cart available, the Shopping Cart with a tore bag of cow poop, and tossed the bag away, and tried to clean the cart some, with paper towels from the *Kidwell's Car*.

60. Plaintiffs, *Billy Kidwell*, and *Hannah Kidwell*, walked into Walmart, past a Walmart Employee near the entry, who said "*Hello, cute puppies*", and Plaintiffs started walking around the store shopping.

61. There was no complaint by the Walmart Employee about Plaintiff's Service Dogs in his Shopping Cart.

62. Plaintiffs shopped for a while, and went to the dog section, where they saw large size flea pills on sale for half off, and an Elderly Woman, with a small Pet Dog in her Shopping Cart, who was also happily shopping.

63. Since dog owners in Florida can always use flea pills, and since Plaintiff's Service Animals are very small dogs, Plaintiffs went to the Service Desk, waited in line, and asked the Walmart Employee if they had any of the flea pills on sale for half off, that were for small dogs.

64. The Walmart Employee stated that only the pills marked were half off, and was very friendly, stating that she never saw dogs as well behaved as Plaintiff's Service Dogs were, and she asked what kind of dogs they were.

65. Plaintiff, Bill Kidwell, replied that they were Japanese Chins, and continued to shop.

(d) The Incident at the Cash Register with Walmart Manager "Handy"

66. After shopping Plaintiffs went to pay for their items, and went to the cash registers, where the Walmart Cashier was a "woman of Color", with a Name Tag, that said her name was "Handy", and that she was some kind of manager.

67. Handy started shouting at *Billy Kidwell*, "*Get out of here! Dogs are not allowed in my store! I hate dogs!*"

68. Plaintiffs explained that they are Service Dogs, as their vests clearly showed, and told the cashier, named "Handy", that *Billy Kidwell* just got off Intensive Care at the Saint Petersburg VA Hospital, for a Stress-Caused Heart Attack, and that he is Medically Unable to stand all the shouting, and stress, and that all Plaintiffs wanted to do was pay for the items in the cart, and leave the store.

69. Hearing that the dogs, *calmly lying in Plaintiff's Shopping Cart*, were Service Dogs, and that Plaintiff is extremely ill, and had just gotten off Intensive Care, and is **Medically Unable to Stand Stress**, seemed to make the cashier, named "Handy", twice as mad, and while ringing up the items Plaintiffs were buying, she kept shouting about Plaintiff's Service Dogs, and how it was her store, and how she hated dogs, and wanted them out of her store. [Emphasis added.]

70. Plaintiff, *Billy Kidwell*, who had just gotten off intensive care in the hospital, started getting dizzy, and short on breath, and having chest pains, from the cashier screaming at him, and he asked her what her name was, and explained to her that she was causing him to suffer Heart Pains, shortness of breath, and dizziness, and was about to pass out from her yelling.

71. The cashier responded that her name is "Handy", and she said she is a store manager, and she showed Plaintiffs, *Billy Kidwell*, and *Hannah Kidwell*, a Walmart name tag with "Handy" written on it.

72. "Handy" said she didn't care how sick *Billy Kidwell* was, or that he just got out of intensive care, that he shouldn't bring dogs into her store.

73. Plaintiffs saw what appeared to be a camera above the cash register area, and asked "Handy" if the incident was being recorded, and "Handy" replied that the Kings Highway Walmart records customers from the time they enter the store, till they leave, and keeps the recording(s) for five (5) years.

74. Billy Kidwell requested a copy of his entire shopping experience at the King's Highway Walmart.

75. *Billy Kidwell* told “*Handy*” that she was causing him Heart Problems with her shouting, and yelling, and that he needed to speak to the manager to complain, and to make a Reasonable Disability Accommodation Request.

76. “*Handy*” got on a phone and called someone, and then told Plaintiffs that the store manager would meet them on the way out of the store.

77. At last “*Handy*” rang up the items, Plaintiffs paid, and started walking towards the door, as Plaintiff, *Billy Kidwell*, tried to keep from passing out, and falling down, from the dizziness, and stress of the Walmart cashier yelling at him, while his daughter, *Hannah Kidwell*, tried to help him walk, and keep him from falling.

78. *Billy Kidwell's* two (2) small Japanese Chin Service Dogs started whining, to alert Plaintiff as to Heart Problems, and wanted to be held, that pursuant to their training showed that Plaintiff was suffering, or starting to suffer, a Stress-Caused P.T.S.D. Anxiety Attack, as they tried to help to calm *Billy Kidwell* during the Anxiety Attack, as they were trained to do.

(e) Assaulted

79. While Plaintiffs, *Billy Kidwell*, and *Hannah Kidwell*, were calmly walking towards the door, with *Billy Kidwell* heavily leaning on the Shopping Cart, trying not to pass out, as his daughter, Plaintiff, *Hannah Kidwell*, held his side, and tried to help him walk, and keep him from falling, all at once *Billy Kidwell* felt a hard hit to his injured back, where a rocket injured his back in Vietnam.

80. An Unknown female, and a man, had ran up behind *Billy Kidwell*, and his daughter, as they were walking to the exit door, and had hit *Billy Kidwell* hard in the back, and were pushing him, as they acted all excited, and kept saying “*Go faster! Get out of my store right now with those dogs!*”, and similar statements, as they kept pushing *Billy Kidwell*, trying to get *Billy Kidwell* to walk faster than his disabilities allow, while he kept struggling to keep from passing out, and falling.

81. *Billy Kidwell*'s daughter, *Hannah Kidwell*, started shaking, and crying, and she stated, in a normal voice, “*My dad just got out of intensive care at the VA Hospital. He can't walk. He can't stand stress! You are killing him!*”

82. The “*Unknown*” female, and male, ignored *Billy Kidwell*'s Daughter, and kept hitting, and pushing, on *Billy Kidwell*'s injured lower back, where a Rocket in Vietnam had injured his back, as they kept acting all excited, pushing on *Billy Kidwell* from behind, telling him to walk faster, while the unknown female started yelling “*You are creating a Disturbance*”.

83. Walmart harasses *Billy Kidwell* every time he asks to speak to a Store Manager to request “*Reasonable Accommodations*” for his Service Dogs, by fraudulently claiming *Billy Kidwell* is creating a disturbance.

84. As *Billy Kidwell* made it outside, he slid to the ground by leaning on the outside cement wall, and told his daughter “*Call the sheriff! They're killing me! I'm going to pass out! My heart is hurting bad, I want them arrested.*”

85. Plaintiff, *Hannah Kidwell*, called the Charlotte County Sheriff's Department, while Plaintiff, *Billy Kidwell*, sat on the cement, on the ground, leaning against the Walmart Store Wall, trying to not move, and be as still as possible, to calm his heart, that was beating real fast, and seemed to be skipping beats, acting strange, as he kept passing out, unable to get air, or breathe, or get his heart to slow down.

86. After about fifteen (15) minutes *Billy Kidwell* started feeling better.

87. A Charlotte County Sheriff Deputy had arrived, and *Billy Kidwell*, had his daughter help him stand up, and lean on the Shopping Cart, so he could explain to the Deputy what had happened.

(f) Intentional Falsification of Charlotte County Sheriff's Incident Report, Case Number 1707-010650, on July 20, 2017 by the Unknown Charlotte County Sheriff Sergeant making the Report, Walmart Store Manager, Chanel Barghausen, and Walmart Loss Prevention Officer, Larry Coultas

88. *Hannah Kidwell*, explained to the Charlotte County Deputy what happened, and how everyone was friendly, and had no problem with *Billy Kidwell's* P.T.S.D. Service Dogs, until *Billy Kidwell*, and his daughter, started to pay at the cash register, and leave the store, when Walmart Manager "*Handy*" attacked them.

89. Plaintiffs, *Billy Kidwell*, and *Hannah Kidwell*, explained to the Sheriff Deputy how the two (2) unknown individuals ran up, and started hitting, and pushing, *Billy Kidwell*, on his sore back, almost knocking him down, as they tried to make *Billy Kidwell*, run out of Walmart, when he is not able to walk without a VA Walker.

90. *Billy Kidwell* told the Police Officer that he is an Elderly, and Disabled Adult, and that the two individuals were informed that *Billy Kidwell* had just been released from the Heart Intensive Care Unit, at the Bay Pines VA Hospital, and that they still intentionally assaulted him, pushed him, and caused him to suffer Heart Pains, and symptoms of having a Stress-Caused Heart Attack.

91. The two Unknown Individuals that had assaulted *Billy Kidwell* now identified themselves to the Sheriff's Deputy as being the Walmart Store Manager, *Chanel Barghausen*, and Walmart Loss Prevention Officer, *Larry Coultas*.

92. All at once four (4) Charlotte County Sheriff's Cars pulled up and a Charlotte County Sheriff Sergeant, and three Charlotte County Sheriff Officers, immediately went over to the Walmart Loss Prevention Officer, *Larry Coultas*, joking with him, and asking him about some recent training, acting like they were best friends, and like the Walmart Loss Prevention Officer had some kind of strong ties to the Charlotte County Sheriff's Department.

93. The Charlotte County Sheriff Sergeant, and one of the officers, an "*Unknown Charlotte County Sheriff Officer*", asked Walmart Loss Prevention Officer, *Larry Coultas*, and the Walmart Manager, *Chanel Barghausen*, what they wanted the police report to put on the report, and what they wanted done, without even talking to the Plaintiff-Victims, *who had called the Sheriff*.

94. The Plaintiffs could hear the Charlotte County Sergeant, and the "*Unknown Charlotte County Officer*" conspiring with the Walmart Loss Prevention Officer, and Walmart Manager, guiding them as to what to say in the police statement.

95. *Billy Kidwell* could hear the Unknown Charlotte County Sergeant, instructing Walmart Loss Prevention Officer, *Larry Coultas*, and the Walmart Manager, *Chanel Barghausen*, on how to lie about the incident, telling them they shouldn't tell the truth, or use the Walmart Manager, named "*Handy*", that had started everything, because they didn't know if they could trust *Handy* to lie for Walmart.

96. So instead of telling the truth, the Unknown Charlotte County Sheriff Sergeant, and the Walmart Store Manager, *Chanel Barghausen*, suborned Perjury from Walmart Loss Prevention Officer, *Larry Coultas*, as they schemed to make up a wild story, to cover-up that they had attacked, and assaulted, an Elderly, Severely Disabled Vietnam Veteran, they knew just got out of the hospital, and was extremely ill, to punish *Billy Kidwell* for needing to use Service Dogs to shop.

97. When *Billy Kidwell* heard Walmart, and the Charlotte County Sheriff's Department, conspiring to falsify the Sheriff's Incident Report, and the Trespass, *Billy Kidwell* had his daughter start filming, as much as she could on her cell phone, as evidence.

(h) The Charlotte County Sheriff's Department Conspired with Walmart, Suborned Perjury, and Falsified the Incident Report

98. Walmart Loss Prevention Officer, *Larry Coultas*, took an Oath, and signed a sworn witness Statement claiming the alleged incident occurred at the Service Desk, that he was conducting floor surveillance, and walked by the service desk, and saw his manager, Chanel, talking to an older male, with Service Dogs in a shopping cart, who kept screaming, and yelling.

99. The Statement by *Larry Coultas* in paragraph 98 above, given Under Oath, is an intentional act of Perjury by *Larry Coultas*, as proven by Walmart's OWN video submitted with the Charlotte County Sheriff's Report, and Declarations submitted by *Billy Kidwell*, and *Hannah Kidwell*. [See Exhibits B, and C.]

100. The incident never occurred at the Service Desk, it occurred at the cash register, far away from the service desk, being operated by a Black Walmart Manager named "*Handy*".

101. There was no "*screaming*" by *Billy Kidwell* that the manager was treating him unfair, nor profanity, nor did *Billy Kidwell*, or *Hannah Kidwell*, refuse to leave, they went outside, and waited for the Sheriff that they had called.

102. The complete incident, as described Under Oath, by *Larry Coultas*, is fraudulent as to the actual Material Facts.

(i) The Video Proof of Perjury, and that the Charlotte County Sheriff's Department Conspired with Walmart, and Falsified the Incident Report

103. *Hannah Kidwell* took video of the Sheriffs outside, and the video proves that the Charlotte County Sheriff's Deputies constantly lied about nearly everything.

104. The Charlotte County Sheriff said, on Video, that the Plaintiff's couldn't make a sworn statement, and that no sworn statements were being taken, and then the sheriff took a secret sworn witness statement from Walmart Security.

105. The Charlotte County Sheriff said that Billy Kidwell's Service Dogs were not service dogs, because there was no certification, they were Service Dogs.

106. Service Dogs do not have certification.

107. The Charlotte County Sheriff said *Billy Kidwell*, and his daughter, were trespassed from Carvers, and the gas station, fraudulently claiming that they were owned by Walmart.

109. Both Carvers, and the gas station sent letters to *Billy Kidwell* stating that Walmart has no authority to trespass anyone from their property.

110. Plaintiffs Daughter, *Hannah Kidwell*, told the Sergeant that she had called the Sheriff, and that the Walmart Security, and the Walmart Store Manager, had assaulted *Billy Kidwell*, hitting, and pushing him, *after being told he has just gotten off Intensive Care at the VA Bay Pines Hospital, for a Stress-Caused Heart Attack, and is Medically Unable to Stand Stress,* and that *Billy Kidwell's* Heart was hurting, and he couldn't hardly breathe, and was passing out because of the Attack on him, by Walmart Officials.

111. The Charlotte County Sheriff Sergeant got real nasty, and stated in a snotty voice, pointing at Plaintiff, *Billy Kidwell*, "*Whatever, he doesn't look sick, or disabled, to me*".

112. The Sergeant then stated, "*I'm talking to Walmart Security now, and they want you trespassed for bringing your dogs into Walmart in violation of a Health Department Order*".

113. *Billy Kidwell* sent his daughter to his car and had her bring a copy of Florida Statute F.S. §825.102, which made it a felony for Walmart Officials to hit *Billy Kidwell*, and intentionally inflict Physical, and/or, Psychological Injury to *Kidwell*, and F.S. 413.08(4) that made it a crime to obstruct *Billy Kidwell* from enjoyment of a Public Accommodation for having Service Dogs.

114. *Billy Kidwell* gave a copy of those Statutes to the Charlotte County Sheriff Sergeant, who got even more nasty, and said “*We don’t care about those laws, we are here for a Trespass, and Walmart can trespass anyone it wants, and do anything it wants, because Walmart is Private Property, and not a Public Accommodation like you claim. Who do you think you are? An Attorney.*”

115. The Walmart Loss Prevention Officer, *Larry Coultas*, then spoke up and stated “*Walmart wants Billy Kidwell, and his daughter, trespassed from this whole section of town, we want him trespassed from Culvers over on the highway, and from Murphy’s Gas Station, because Walmart rents to them, and controls their businesses*”.

116. *Billy Kidwell*, and *Hannah Kidwell*, were trespassed for nearly four (4) years based on the fraudulent Sheriff’s Report.

117. Since the COVID 19 Pandemic Walmart started sterilizing their shopping carts after each use, like they should have been doing prior to the Pandemic, if they really cared about cleanness of their shopping carts, or the safety of their customers.

118. The easy, *and nearly costless*, sterilization of shopping carts by Walmart, during the Pandemic proves that Walmart could have cleaned, and sterilized, the rare shopping carts, Disabled Veterans with P.T.S.D. Service Dogs needed to exercise Safe Access to their stores to shop, and that the fraudulent claim by Walmart that “*Service Animals are a Health Threat*” was all a dishonest con game by Walmart to keep Disabled Veterans, with P.T.S.D. Service Dogs, out of their stores.

119. *Billy Kidwell* sent personal letters to Walmart CEO, *Doug McMillion*, and Walmart, General Counsel, *Karen Roberts*, explaining how their Walmart Store is concealing Video of the attack on *Billy Kidwell*, and concealing Key Witness, Walmart Manager, “*Handy*”, to Obstruct Justice, and cover up the assault, the falsification of the Sheriff’s Report, the fraudulent Trespass, and other crimes against *Billy Kidwell*, and his daughter.

120. Walmart CEO, Doug McMillion, and Walmart General Counsel, Karen Roberts, became “*Accessories After the Fact*”, and are helping the Walmart on Kings Highway Obstruct Justice, and conceal, video of the attack on *Billy Kidwell*, and the Key Witness, Walmart Manager “*Handy*”.

VI. FIRST CAUSE OF ACTION

Violation of Civil Rights-Fifth, and Fourteenth Amendments-42 U.S.C. §1983

121. The Kings Highway Walmart Defendants, and Charlotte County Sheriff, Defendants, acting “*Under Color of State Law*”, knowingly, and intentionally, with Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff’s

Constitutional, and Statutory Rights, violated Plaintiff, *Billy Kidwell's* Constitutional Due Process Rights, and falsified Police Reports, suborned Perjury, and fraudulently trespassed Billy Kidwell, and Hannah Kidwell from the Kings Highway Walmart, for nearly four (4) years, substantially aggravating *Billy Kidwell's* Stress Disabilities, his Stress-Caused Stomach, and Heart Disabilities, inflicting massive Damages on him, and strongly contributing to Plaintiff, *Billy Kidwell*, suffering a massive, Stress-Caused, Life-Threatening, Heart Problems, and a probable Stress-Caused Heart Attack.

122. Plaintiff seeks Actual, and Compensatory, Damages in an amount to make Plaintiff(s) whole.

141. Plaintiff seeks Punitive Damages to punish, and deter, Charlotte County, and the Charlotte County Sheriff, from further Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff's Constitutional, and Statutory Rights.

VII. SECOND CAUSE OF ACTION

Violation of Civil Rights- Fifth, and Fourteenth Amendment-42 U.S.C. §1983

142. Plaintiff incorporates by reference all allegations set forth in paragraphs 1 through 141, above, as if fully set below.

143. All of the Defendants have concealed, and hid, video of July 20, 2017 at the Kings Highway Walmart, and hid Key Witness, "*Handy*" denying Plaintiffs Due

Process of law, while Defendants obstructed Justice, substantially aggravating *Billy Kidwell's* Stress Disabilities, while violating both Plaintiff's rights, harming them.

144. Plaintiff seeks Actual, and Compensatory, Damages in an amount to make Plaintiff(s) whole.

145. Plaintiff seeks Punitive Damages to punish, and deter, Charlotte County from further Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff's Constitutional, and Statutory Rights.

VIII. THIRD CAUSE OF ACTION

Violation of Federal Statutory Disability Rights Civil Rights- Fourteenth Amendment-42 U.S.C. §1983

146. Plaintiff incorporates by reference all allegations set forth in paragraphs 1 through 145, above, as if fully set below.

147. Defendant, *Walmart*, and the Charlotte County Sheriff, knowingly, and intentionally, with Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of Plaintiff's Constitutional, and Statutory Rights, violated Plaintiff, *Billy Kidwell*, and *Hannah Kidwell's*, Fourteenth Amendment Right to Equal Treatment, and Equal Protection of the Law, pursuant to the United States Constitution, by denying *Billy Kidwell*, and *Hannah Kidwell*, the same right to shop at the Kings Highway Walmart the Non-Disabled enjoy.

148. Plaintiff seeks Actual, and Compensatory, Damages in an amount to make Plaintiff(s) whole.

149. Plaintiff seeks Punitive Damages to punish, and deter, Walmart Stores, and the Charlotte County Sheriff. From further Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of both Plaintiff(s) Constitutional, and Statutory Rights.

IX. FOURTH CAUSE OF ACTION

Violation of Federal Statutory Disability Rights Civil Rights- Fourteenth Amendment-42 U.S.C. §1983

150. Plaintiff incorporates by reference all allegations set forth in paragraphs 1 through 149, above, as if fully set below.

151. Defendants, *Walmart*, and Walmart CEO, *Doug McMillion*, and Walmart General Counsel, *Karen Roberts*, knowingly, and intentionally, with Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of both Plaintiff's Constitutional, and Statutory Rights, violating Plaintiff, *Billy Kidwell*, and *Hannah Kidwell's*, Fifth, and Fourteenth Amendment Rights to Due Process of Law, by concealing Store Videos proving that the Charlotte County Sheriff's Report, used to trespass them, is fraudulent, and the fruit of a Criminal Scheme between Walmart, and the Charlotte County Sheriff's Department.

152. Plaintiff seeks Actual, and Compensatory, Damages in an amount to make Plaintiff(s) whole.

153. Plaintiff seeks Punitive Damages to punish, and deter, Walmart Stores, Walmart CEO, *Doug McMillion*, and Walmart General Counsel, *Karen Roberts*, from further Willful Malice, and the Intentional Gross, and/or, Reckless Disregard of both Plaintiff(s) Constitutional, and Statutory Rights.

X. RELIEF

154. Plaintiffs seek a Court ORDER requiring Charlotte County to strictly comply with both State, and Federal, Disability Laws.

155. Plaintiffs seek damages from each Defendant, in an amount to make Plaintiffs whole.

156. Plaintiffs seek Punitive Damages in an amount of not less than \$250 Million Dollars to provide a “*Meaningful*” deterrent to stop the long pattern of wrongful, and illegal acts, with Malice, by Walmart, Walmart’s CEO, and Walmart’s General Counsel, as described herein.

157. Plaintiff(s) seek any other relief they are entitled to.

Respectfully submitted,



July 18, 2021

Billy Kidwell, *Pro Se*

Hannah Kidwell

July 18, 2021

Hannah Kidwell, *Pro Se*

EXHIBIT A

The Picture Below, posted on the outside wall of the Kings Highway Walmart in Port Charlotte, proves that Service Animals are Not Allowed in Shopping Carts, allegedly “to Maintain Cleanliness of Carts”, however Pet Dogs are Allowed in the Shopping Carts.



EXHIBIT B

Hannah Kidwell
5064 Silver Bell Drive
Port Charlotte, FL. 33948

VeteransDeserveRights@Outlook.com

**UNSWORN DECLARATION OF HANNAH KIDWELL, PROVING
LARRY COULTAS COMMITTED PERJURY, AND THAT WALMART
MANAGER, CHANEL BARGHAUSEN, AND LARRY COULTAS,
KNOWINGLY, AND INTENTIONALLY, FALSIFIED THE SHERIFF'S
REPORT ON JULY 20, 2017, TO FRAUDULENT TRESPASS BILLY
KIDWELL, AND HANNAH KIDWELL, FROM THE KINGS HIGHWAY
WALMART IN PORT CHARLOTTE, FLORIDA**

I, *Hannah Kidwell*, hereby state the following, Under Penalty of Perjury, pursuant to Title 28 U.S.C. §1746, stating that the statements herein are true to the best of my knowledge, and beliefs.

1. I, *Hannah Kidwell*, state that I am over the age of eight (18), and that I have personal knowledge of the facts, and statements, herein.

2. I state that I have carefully read the Witness Affidavit of *Larry Coultas*, given on July 20, 2017, and that the Witness Affidavit is knowingly, and intentionally, Perjured by *Larry Coultas*, as to the actual Material Facts.

3. I state that Walmart Loss Prevention Officer, *Larry Coultas*, and Walmart Manager, *Chanel Barghausen*, knowingly, and intentionally, conspired with Charlotte County Sheriff's Department Officers, at the King's Highway Walmart in Port Charlotte, Florida to suborn Perjury, and falsify a Sheriff's Incident Report, to wrongly Trespass *Billy Kidwell*, and *Hannah Kidwell*, from the King's Highway Walmart Store.

4. I state that Walmart Loss Prevention Officer, *Larry Coultas*, knowingly, and intentionally, lied about the alleged incident at Walmart on July 20, 2017, and committed Perjury on a Witness Form, with the intent to falsify a Charlotte County Sheriff's Report, and wrongly trespass *Billy Kidwell*, and *Hannah Kidwell*, from Walmart.

5. I state that the alleged incident did not occur at the Service Desk, as Walmart Loss Prevention Officer, *Larry Coultas*, and Walmart Manager, *Chanel Barghausen*, fraudulently claim.

6. I state that I was shopping with my dad, *Billy Kidwell*, at the Kings Highway Walmart, on July 20, 2017, with my dad's P.T.S.D. Service Dogs in his Shopping Cart, and there was no problem until we went to a cash register to pay for our purchases.

7. At the cash register was a Black Female, with a Walmart Manager Tag, saying her name was "*Handy*".

8. Handy seemed to be in a bad mood, and was mumbling, and grumbling, to herself when we walked up, and then as she started ringing up our purchases, she started yelling that we can't have dogs in a shopping cart, that she hates dogs, and don't want them in her Walmart.

9. She kept yelling real loud at my dad, *Billy Kidwell*, and I told her that my dad is very sick, and had just gotten out of the VA Hospital for a Stress-Caused Heart Attack, and that her yelling could cause my dad to suffer another Heart Attack.

10. VA Records will prove that I am a VA Caregiver for my dad, and authorized to help him walk, and avoid stress.

11. Telling the cashier named, *Handy*, that my dad is extremely ill and is **Medically Unable to Stand Stress**, and yelling, seemed to get Handy a lot madder, and she started screaming right in my dad's face that he better never bring Service Dogs to Walmart again, and that Walmart doesn't go by any Americans with Disabilities Act. [Emphasis added.]

12. My dad looked up at a camera, and asked *Handy*, if Walmart was filming the incident.

13. *Handy* responded that the King's Highway Walmart Supercenter is one of Walmart's main District Stores, where every inch of the store is constantly filmed, and that the video is stored for five (5) years.

14. My dad stated he wanted a copy of the video.

15. *Handy* kept yelling and screaming, and my dad started shaking, and said his heart was hurting, that he was having problems getting his breath, and that he was extremely dizzy and about ready to pass out, as at last *Handy* rang up the last of our purchases, so we could pay, and leave.

16. Right before leaving my dad, *Billy Kidwell*, asked *Handy* to call the store Manager, that he wanted to file a Complaint with her.

17. *Handy* started shouting, and raving again, and then said that the Store Manager would meet us outside, so my dad, and I, started walking towards the door.

18. My dad was almost passing out and barely able to walk putting all his weight on the Shopping Cart, and as we walked toward the door an Unknown man, and woman, ran up all excited, and acting crazy, yelling that we had to get out of the store right now, as they hit my dad's back, trying to push him out of the store faster than he can walk.

19. Once outside my dad slid to the ground, and the woman said she was the store manager, and the man said he was Walmart Loss Prevention.

20. Both the Walmart Loss Prevention Officer, *Larry Coultas*, and Walmart Manager, *Chanel Barghausen*, whispered, and kept scheming, with a very dishonest Charlotte County Sheriff Sergeant, saying they didn't want "*Handy*" on the Sheriff's Report, so they lied about the incident, and got *Larry Coultas* to commit Perjury.

21. The Walmart Loss Prevention Officer, *Larry Coultas*, and Walmart Manager, *Chanel Barghausen*, seemed to be very hateful towards Disabled Veterans, with needed Service Dogs, and they kept making up stuff, trying to hurt me, and my dad, as much as possible.

22. *For example*, first the Walmart Loss Prevention Officer, *Larry Coultas*, said he wanted *Billy Kidwell*, and *Hannah Kidwell*, trespassed from the whole Kings Highway Area, while Walmart Manager, *Chanel Barghausen*, kept grinning, and smiling.

23. Then Walmart Loss Prevention Officer, *Larry Coultas*, said that Walmart rented to all the stores around Walmart, and that he wanted *Billy Kidwell*, and *Hannah Kidwell*, trespassed from Culvers Restaurant, and Murphy's Gas Station, because he said Culvers, and Murphy's, rented from Walmart, and that Walmart controlled them.

24. Walmart Store Manager, *Chanel Barghausen*, kept grinning, and smiling, agreeing with Larry Coultas.

25. At first the "Unknown" Charlotte County Sheriff Sergeant went along with the Walmart Loss Prevention Officer, *Larry Coultas*, and was trespassing *Billy Kidwell*, and *Hannah Kidwell* from the whole area, but after a while of threatening the *Kidwell's*, the Charlotte County Sheriff Sergeant agreed to just trespass the *Kidwell's* from Walmart, saying that "*If I were you I would come around any of those businesses anyhow, since they are close to Walmart*".

26. My dad has been extremely sick since being attacked at Walmart, and is nearly completely bedbound, and sick all the time.

27. For over three (3) years my dad, and I were scared to go around Culvers Restaurant, and Murphy's Gas Station, and then my dad decided to contact them and was told by both Murphy's, and Culvers, that Walmart had no right to threaten the *Kidwell's*, or to trespass anyone from their businesses, and both businesses seemed upset that Walmart was trespassing people from their businesses.

28. I state that on July 20, 2017, my dad requested a copy, of the complete video of my dad, and I shopping at the Kings Highway Walmart, with his Service Dogs, and the full name of the Walmart Manager that attacked him, named "*Handy*".

29. I state that on Friday, July 21, 2017, my dad mailed a Request for a Copy of the Kings Highway Walmart Video, of our complete shopping trip on July 20, 2017, with a request to Preserve Evidence, to Walmart CEO, *Doug McMillion*, to the General Counsel of Walmart, *Karen Roberts*, to Kings Highway Walmart Store Manager, *Chanel Barghausen*, to Walmart Loss Prevention Officer, *Larry Coultas*, and to the Charlotte County Sheriff, *Bill Prummell*.

30. There has been no response, so my dad sent at least three more letters requesting the video of July 20, 2017, with Still no replys.

31. I state that I am willing, and eager, to take a polygraph to support the statements made herein.

32. I am willing, and eager, to testify in a Court of Law as to the statements made herein.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and beliefs, as a Pro Se Litigant.



July 18, 2021

Hannah Kidwell
5064 Silver Bell Drive
Port Charlotte, Florida 33948

VeteransDeserveRights@outlook.com