

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT**

*** FILED ***

2014 JAN -8 PM 8: 38

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DONALD WILLIAMS

PLAINTIFF

-against-

CLERK
U.S. DISTRICT COURT
E.D.N.Y.
VERIFIED COMPLAINT

ORIGINAL

**THE CITY OF NEW YORK
&
THE NEW YORK CITY POLICE DEPARTMENT
&
POLICE OFFICER JESSE ULLGER
INDIVIDUALLY & IN HIS OFFICIAL CAPACITY
AS NEW YORK CITY POLICE**

DEFENDANT

GARAFIS, J.

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JURISDICTION

BLC [Signature]

THIS ACTION IS BROUGHT PURSUANT TO 42 U.S.C. 1983 AND 1988, & THE 4, 5, 6, 8 & 14, AMENDMENT OF THE CONSTITUTION.

JURISDICTION IS FOUNDED ON 28 U.S.C. 1291 & 1331 & 1343 (1) (2) (3) (4) OF AFOREMENTIONED STATORY AND CONSTITUTIONAL PROVISIONS

PLAINTIFF FURTHER INVOKES THE PENDENT JURISDICTION OF THIS COURT TO ADJUDICATE CLAIMS ARISING UNDER NEW YORK STATE COMMON LAW UNDER THE NEW YORK CITY CODE.

PARTIES

1. THE PLAINTIFF DONALD WILLIAMS 309 BEACH 54 STREET #1C ROCKAWAY NEW YORK 11692
2. THAT ALL TIMES MATERIAL HERETO, DEFENDANT THE CITY OF NEW YORK CORPORATION COUNSEL 100 CHURCH STREET NEW YORK 10007
3. THE NEW YORK CITY POLICE DEPARTMENT 1 POLICE PLAZA NEW YORK, NEW YORK 10038 A MUNICIPAL ORGANAZATION EXISTING UNDER THE LAWS OF THE UNITED STATES.
4. THAT THE DEFENDANT THE CITY OF NEW YORK AND ITS AGENTS, SERVENTS, POLICE DEPARTMENT DID VIOLATE PLAINTIFF UNITED STATES CONSTITUTIONAL 4, 5, 6, 8, & 14 AMENDEMENT RIGHTS.

5. PLAINTIFF ALSO ALLEGES VARIOUS STATE LAW CLAIMS AGAINST THE CITY OF NEW YORK AND ITS AGENTS.
6. THE DEFENDANT THE CITY OF NEW YORK CREATED THE AFORESAID DEFECTIVE CONDITION.

AS FOR A CAUSE OF ACTION

7. THE INCIDENT COMPLAINED OF OCCURRED IN THE COUNTY OF KINGS , STATE OF NEW YORK , AT OR ABOUT 284 SUTTER AVENUE.
8. ON OR ABOUT OCTOBER 11, 2012 PLAINTIFF DONALD WILLIAMS THROUGH NEGLIGENT SUPERVISION , WAS FALSELY ARRESTED , IMPRISONED UNLAWFULLY , AND WITH WILLFULL NEGLIGENT (PERSONALLY INJURED) ASSAULTED AND BATTERED , HUMILATED AND MALICIOUSLY ABUSED AND PROSECUTED , AND LEFT MENTALLY DURESSSED. A VIOLATION OF NEW YORK STATE LAW AND THE UNITED STATES CONSTITUTION.
9. ON SAID DATE PLAINTIFF WAS SLAMED TO THE PAVEMENT AND ASSAULTED AND BATTERED THEN SEARCHED AND ARRESTED FOR NO APARENT REASON , IN THE COURT YARD OF BROWNSVILE HOUSES BY OFFICER ULLGER #30637
10. PLAINTIFF WAS THEN TAKEN TO SUTTER AVENUE P.S.A. #2 AND THEN SEARCHED AGAIN THEN IMPRISONED.
11. PLAINTIFF WAS BLEEDING FROM THE MOUTH AND HAD SHORTNESS OF BREATH AND FELT , SEVERE PAIN IN HIS BACK AND KNEE AREA OF HIS LEG , AND ALSO SCRAPES ON HIS FACE AND HANDS.
12. PLAINTIFF WAS CONFINED FOR ABOUT 3 DAYS , THEN RELEASED ON R.O.R. AT CENTRAL BOOKING.
13. PLAINTIFF WAS GIVEN A COURT DATE OF OCTOBER 29, 2012 FOR CRIMINAL COURT DOCKET #KN085520 THS WAS ADJOURNED TO JANUARY 28, 2013
14. ON OR ABOUT JANUARY 9, 2013 & MARCH 29 , PLAINTIFF FILED A CLAIM WITH THE COMPTROLLER OFFICE AGAINST THE CITY OF NEW YORK AND THE POLICE DEPARTMENT
15. ON OR ABOUT JANUARY 28, 2013 SAID CASE WAS DISMISSED IN PLAINTIFF FAVOR.
16. ON APRIL 20, 2013 PLAINTIFF FILED ANOTHER CLAIM AT THE COMPTROLLER OFFICE OF THE CITY OF NEW YORK , SAID CLAIMS HAS NOT BEEN ADJUSTED AND PLAINTIFF HAS NOT RECEIVED A T 50 H HEARING ON THE MATTER.

AS FOR A SECOND CASE OF ACTION

17. THE CITY OF NEW YORK AND THE NEW YORK CITY POLICE DEPARTMENT HAS PROJECTED A POLICY AND A PATTERN OF NOT EFFECTIVELY TRAINING OR SUPERVISING ITS OFFICERS WHICH HAS CAUSED THE VIOLATING OF ITS CITIZENS CONSITTUTIONAL RIGHTS.
18. THE NEW YORK POLICE DEPARTMENT HAS A PATTERN AND PRACTICE OF UNLAWFULLY ARRESTING MINORITIES SO THAT IT CAN MEET ARREST QUOTAS.
19. THERE WAS NO NEED FOR THE OFFICER TO BRUTILIZE PLAINTIFF , OR ARREST HIM NO CRIME HAD BEEN COMMITTED.

WHEREFORE , DONALD WILLIAMS DEMANDS JUDGEMENT AGAINST THE DEFENDANT ON CAUSE OF ACTION 1 IN THE AMOUNT OF \$400,000.00

AND IN THE 2 CAUSE OF ACTION \$300,000.00


TOGETHER WITH INTREST , COSTS , AND DISBURSEMENTS OF THIS ACTION , AND SUCH AND OTHER AND FURTHER RELIEF IN LAW THAT THE COURT DEEMS JUST AND PROPER.

JURY DEMAND

PLAINTIFF HEREBY REQUEST THAT THIS ACTION BE TRIED BEFORE A JURY

DATED : JANUARY 8 . 2014

RESPECTFULLY SUBMITTED


DONALD WILLIAMS PRO-SE
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