

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

14CV8294

Henry Abraham

(In the space above enter the full name(s) of the plaintiff(s).)

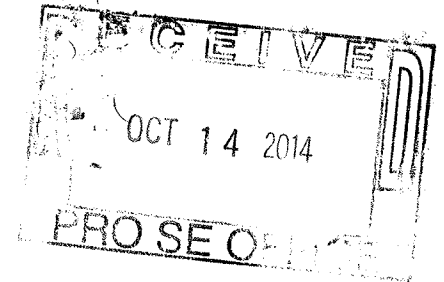
COMPLAINT

-against-

New York City Police Dept.
N.Y.P.D. Officer, Hugh Herbert
N.Y.P.D. Officer, James Lukeson
Kings County Court Judge Mark Dwyer
Kings County District Attorney's Office
New York City Dept. of Connections.

Jury Trial: Yes No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)



I. Parties in this complaint:

A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name Henry Abraham, Din # 14A2332
Street Address Bare Hill Conf. Fac, 181 Brand Rd.
County, City Franklin, Malone
State & Zip Code New York 12953
Telephone Number _____

B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name N.Y.P.D. Officers, Hugh Herbert & James Lukeson
Street Address 60th Precinct, 2951 W. 8th St.

County, City Kings, Brooklyn
State & Zip Code N.Y. 11224
Telephone Number -

Defendant No. 2 Name Mark Dwyer, Kings Co. Court Judge
Street Address 320 Jay St.
County, City Kings, Brooklyn
State & Zip Code N.Y. 11201
Telephone Number -

Defendant No. 3 Name Kings County District Attorney's office
Street Address 350 Jay St.
County, City Kings, Brooklyn
State & Zip Code N.Y. 11201
Telephone Number -

Defendant No. 4 Name New York City Dept. of Correction
Street Address 16-00 Hazen St.
County, City Queens, E. Elmhurst
State & Zip Code N.Y. 11370
Telephone Number -

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (check all that apply)

- Federal Questions Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Civil Rights Violations, illegal & wrongful arrest, Deprivation of character, Rights to a speedy trial, invasion of privacy & Judicial Misconduct.

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship New York
Defendant(s) state(s) of citizenship New York

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? When I was arrested & court proceedings & while at the Riker's Island Facility.

B. What date and approximate time did the events giving rise to your claim(s) occur? from the date of arrest on 6/6/12, thru May/June 2014!

When I was transferred to state custody.

C. Facts: Upon my arrest for the crime that I am currently incarcerated for, in the beginning, I was illegally & wrongfully arrested by N.Y.P.D., officers, Hugh Herbert & James Lukeson! They threatened to kill me & were physical towards me, in every way. In the court proceedings, Judge Dwgen & Kings County District Attorney's (Janet Gleeson, Esq & Matthew Bennett, Esq.) acted "biasedly" towards me during the Court proceedings & up to my sentencing! Janet Gleeson even was told to take the stand by the Court, against me & degraded my character. The New York City Dept. of Connections, violated my constitutional rights, of invasion of my privacy by monitoring my phone calls, while I was detained on Riker's Island & violated my freedom of speech, with my family & friends. I have all the list of documents & all parties that were involved, by a phone call documents, that proves the people they violated.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. when I was arrested, I was pushed to the ground from the back & the police officer, jumped on my back & neck. I was taken to the hospital in ambulance from the P.D. station, & had multiple concussions & bruises & my hand cut open, by what they did to me. I have the police report that proves this & the hospital records from Coney Island Hospital. I suffer from anxiety, depression & have a very bad scar on my hand & I continue to have back & neck pain from this incident. All defendants involved caused mental & physical damage to me.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. Due to the Negligence & Police brutality & the wrongful acts of all the listed defendants involved, I am seeking the sum of: \$50,000,000.00 (Fifty Million Dollars). I am also seeking "full reimbursement" of money that was taken from me during the frisk & of the arrest, as the N.Y.P.D. claimed I only had \$161.00 on my possession. I actually had \$3,000.00 in cash & the officer's took the money. I am also in request to be assigned "Pro Bono" counsel, as I completely lack knowledge of the laws & I am completely financially stricken! I am seeking this sum of compensation due to the mental, physical injuries that I have received & know what they all did to me was in violation of all of my constitutional rights & characteristics!

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 10th day of October, 2014.

Signature of Plaintiff

[Handwritten Signature]

Mailing Address

Bane Hill Corr. Facility
Callen Box 20, 181 Brand Rd.
Malone, N.Y. 12953

Telephone Number

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Fax Number (if you have one)

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Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this 10th day of October, 2014, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:

[Handwritten Signature]

Inmate Number

14A2332