

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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2016

WILLIE BROWN

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

-against-

NEW YORK CITY POLICE COMM.
WILLIAM BRATTON; 77TH PCT P.D. MELIN
CODERO #26046; P.D. BRIAN FEELEY #
2768.

COMPLAINT

under the
Civil Rights Act, 42 U.S.C. § 1983
(Prisoner Complaint)

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.)

16CV4036

I. Parties in this complaint:

A. List your name, 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 WILLIE BROWN
ID # 1411600234
Current Institution G.R.V.C.
Address 09-09 HAZEN STREET
EAST ELMHURST, N.Y. 11370

B. List all defendants' names, positions, places of employment, and 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.C. POLICE COMM. WILLIAM BRATTON Shield # _____
Where Currently Employed POLICE HEADQUARTERS
Address ONE POLICE PLAZA
NEW YORK, N.Y. 10007

Defendant No. 2 Name P.O. MELIN CODERO Shield # 26046
Where Currently Employed 77TH PRECINCT
Address 127 UTICA AVENUE
BROOKLYN, N.Y. 11213

Defendant No. 3 Name P.O. BRIAN FEELEY Shield # 2768
Where Currently Employed 77TH precinct
Address 127 UTICA AVENUE
BROOKLYN, N.Y. 11213

Defendant No. 4 Name _____ Shield # _____
Where Currently Employed _____
Address _____

Defendant No. 5 Name _____ Shield # _____
Where Currently Employed _____
Address _____

II. 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 Do not cite any cases or statutes.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. In what institution did the events giving rise to your claim(s) occur?
NOT APPLICABLE

B. Where in the institution did the events giving rise to your claim(s) occur?
NOT APPLICABLE

C. What date and approximate time did the events giving rise to your claim(s) occur?
NOVEMBER 18, 2015 AT APPROXIMATELY 2:04 A.M.

D. Facts: ON NOVEMBER 18 2015, AT APPROXIMATELY 2:04 A.M.

What happened to you?

WHILE PLAINTIFF WILLIE BROWN WAS INSIDE A BODEGA ON 125 KINGSTON AVENUE BETWEEN BERGEN STREET, AND ST. MARKS STREET AN UNIDENTIFIED BLACK WOMAN ENTERED SAID BODEGA WITH A BAG, TIED SOMETHING TOGETHER AND LEFT IT BEHIND. PLAINTIFF THOUGHT NOTHING OF IT AND EXITED THE BODEGA AS WELL. PLAINTIFF WAS THEN CONFRONTED

Who did what?

AND FALSELY ARRESTED BY DEFENADNTS POLICE OFFICER MELIN CODREO, AND BRIAN FEELEY OF THE 77TH precinct FOR THE CONTENTS INSIDE SAID BAG LEFT INSIDE THE BODEGA BY THE UNIDENTIFIED BLACK WOMAN BECAUSE IT WAS EARLY IN THE MORNING AND THE PLAINTIFF WAS BLACK A STOP AND FRISK ACCOMPANIED BY RACIAL PROFILING BEHAVIOR BY

Was anyone else involved?

THESEXS TWO DEFENDANTS, AND FALSELY CHARGED WITH POSSESSION OF A WEAPON THAT THEY ALLEGEDLY RETRIEVED FROM THE BAG IN THE BODEGA LEFT BY THE UNIDENTIFIED BLACK WOMAN THAT MYSTERIOUSLY DISAPPEARED. THUS VIOLATING PLAINTIFF'S FOURTH, FIFTH, EIGHTH, AND FOURTEENTH AMENDMENT RIGHTS WHERESAAS PLAINTIFF WAS STOPPED AND SEARCHED WITHOUT PROBABLE CAUSE, AND WAS DISCRIMINATED AGAINST THE ACTS WERE DELIBERATE INDIFFERENT TO PLAINTIFF, WHERE IT WAS COMMITTED AS A DEPRAVED INDIFFERENCE TO PLAINTIFF THAT LEAD TO THE

Who else saw what happened?

LOSS OF A CIVIL LIBERTY INTEREST THAT IS CRUEL AND UNUSUAL PUNISHMENT WHERE HE STILL IS UNLAWFULLY CONFINED, AND HAS SERIOUSLY DISTURBED HIS BUE PROCESS RIGHTS WHERE SAID WEAPON WAS NOT FOUND ON

III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. ~~ANGUISH FROM BEING WITHOUT LOVED ONES, NIGHTMARES, INSOMNIA~~ TREMENDOUS AMOUNT OF EMOTIONAL STRESS AND MENTAL MIGRAINE HEADACHES, AUDITORY HALLUCINATIONS, PARANOIA LOSS OF SELF-ESTEEM FROM NEWSPAPER WRITINGS FALSAELY ACCUSING PLAINTIFF SEE ATTACHED CLIPPINGS FALSIFIED BY THE MEDIA.

IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes ___ No XX

HIS PERSON, AND WITHIN THE STATE OF NEW YORK, POSSESSION IS 9/10THS OF THE LAW , WHICH CLEARLY DEFINES PROPRTY HAVING TO BE IN YOUR POCKET IN ORDER TO POSSESS IT. PLAINTIFF WAS NOT ORIGINALLY INDICTED BY A GRAND JURY FOR THIS FALSE OFFENSE, AND STILL REMAINS UNLAWFULLY DETAINED INSIDE

THE NEW York city department of correction for said false A RREST, STOP AND FRISK, AND RACIAL PROFILING BY THE TWO DEFENDANTS MELIN CODERO, AND BRIAN FEELEY OF THE 77TH PRECINCT. THE ISSUE OF STOP AND FRISK, AND RACIAL PROFILING HAS LONG BEEN DETERMINED AS BERING UNCONSTITUTIONAL BY THIS VERY COURT. THE DEFENDANT POLICE COMMISSIONER WILLIAM BRATTON IS AN ACTOR UNDER THE COLOR OF STATE LAW AND IS LIABLE UNDER MUNICIPAL LAW IN THAT HE DID NOT CONDUCT A THOROUGH TRAINING TO THE TWO DEFENDANTS MELIN CODERO AND POLICE OFFICER BRIAN FEELEY ON HOW TO INVESTIGATECRIMES

WITHOUT CALLING TO QUESTION MATTERS OF DISCRIMINATION, STOP, AND FRISK THAT LEADS TO BEHAVIORS AND ACT TO THE MAGNITUDE OF RACIAL PROFILING DURING ARRESTS, ESPECIALLY FOR WEAPONS.

PLAINTIFF 'S CHARACTER IS DEFAMED BY FALSIFIED MEDIA REPORTS(SEE ATTACHED CLIPPINGS. THESE DEFENDANTS NAMED HEREIN HAVE CAUSED A TREMENDOUS AMOUNT OF HARDSHIP ON PLAINTIFF AND HIS FAMILY, AND HAVE MADE IT ALMOST IMPOSSIBLE FOR PLAINTIFF TO STRENGTHEN HIS FAMILY TIES FROM HIS CURRENT CONFINEMENT BASED ON A BIASED ARREST WITHOUT PROBABLE CAUSE, AND/OR EVIDENCE WHERE THERE EXIST VIDEO FOOTAGE THAT WOULD CLEARLY EXONERATE PLAINTIFF.

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

NOT APPLICABLE

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes ___ No XX Do Not Know ___

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes ___ No XX Do Not Know ___

If YES, which claim(s)? NOT APPLICABLE

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes ___ No XX

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes ___ No XX

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

NOT APPLICABLE

1. Which claim(s) in this complaint did you grieve?

NOT APPLICABLE

2. What was the result, if any?

NOT APPLICABLE

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process.

NOT APPLICABLE

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

NOT APPLICABLE

2. If you did not file a grievance but informed any officials of your claim, state who you informed,

when and how, and their response, if any: _____

NOT APPLICABLE

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

NOT APPLICABLE

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. Relief:

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). PLAINTIFF SEEKS PAIN AND SUFFERING DAMAGES FROM EACH DEFENDANT IN THEIR INDIVIDUAL, AND OFFICIAL CAPACITY IN THE AMOUNT OF \$250,000.00 plaintiff ALSO SEEKS EMOTIONAL STRESS AND MENTAL ANGUISH DAMAGES FROM EACH DEFENDANT IN THEIR INDIVIDUAL, AND OFFICIAL CAPACITY IN THE AMOUNT OF \$250,000.00 AND FINALLY PLAINTIFF SEEK PUNITIVE DAMAGES FROM EACH DEFENDANT IN THEIR INDIVIDUAL AND OFFICIAL CAPACITY IN THE AMOUNT OF \$500,000.00 FOR A SUBTOTAL OF FOUR 4.5 POINT FIVE MILLION DOLLARS.

VI. Previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes ___ No xxx

On these claims

B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff NOT APPLICABLE

Defendants N/A

2. Court (if federal court, name the district; if state court, name the county) N/A

3. Docket or Index number N/A

4. Name of Judge assigned to your case N/A

5. Approximate date of filing lawsuit N/A

6. Is the case still pending? Yes No XX

If NO, give the approximate date of disposition N/A

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) N/A

N/A

N/A

On other claims

C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment?

Yes No XX

D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff N/A

Defendants N/A

2. Court (if federal court, name the district; if state court, name the county) N/A

3. Docket or Index number N/A

4. Name of Judge assigned to your case N/A

5. Approximate date of filing lawsuit N/A

6. Is the case still pending? Yes No XX

If NO, give the approximate date of disposition N/A

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) N/A

N/A

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

Signed this 1ST day of APRIL, 2016.

Signature of Plaintiff

Willie Brown

Inmate Number

1411600234

Institution Address

09-09 HAZEN ST, G.R.V.C.

EAST ELMHURST, N.Y.

11370

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 1ST day of APRIL, 2016, 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:

Willie Brown

WILLIE BROWN

cut generated by one cab ride, Foran said.

MTA Chair Tom Prendergast said the city and state should ensure that e-hail app users pay the 50-cent surcharge.

But, an Uber spokesman said, "Uber riders pay four times more in taxes per ride than taxi riders do," generating \$40 million in city and state revenue in the first half of 2015.

"If the MTA wants to claim that revenue, they should take that up with the city and state," he added.

Danielle Furfaro

Cops' coffee run nets gun

Two NYPD cops on a coffee-run arrested a gun-toting Brooklyn man outside a Crown Heights deli Wednesday, authorities said.

The 77th Precinct plainclothes officers were stopped at a red light in their car on Kingston Avenue at Bergen Street when they saw the man suspiciously trying to stash a bag in the corner deli.

The cops detained Willie Brown and went looking for the bag. They found a loaded 9mm Smith and Wesson hidden inside a pair of work boots, police said.

Brown, 32, who has eighteen prior arrests, was slapped with a charge of criminal possession of a weapon.

Kathleen Culliton

Deadly hit-run

A woman was killed in a hit-and-run accident as she tried to cross a street in Brooklyn Wednesday night, cops said.

The unidentified victim was struck at around 7:15 p.m. on

Manhattan hotel Wednesday

ear

ers

been spent: \$550,000 in support for daughters Samola, 10, born to ex-wife DeRichards, and another 0 on child support for a twins Max and Bob, born wife Brooke Mueller. \$416,215 def. \$320,246 for "personal and \$130,000 on clothing. also spent \$188,700 on the contributions — in-funds for AIDS research tions.

was also admitted spending n paying off blackmailers. eveled Wednesday that ailers included unnamed sts who had threatened to a sex video featuring a transsexual, In Touch. The shakedowns got so some point Sheen began



Police find loaded gun in deli, make arrest

November 22, 2015 11:03 AM

BROOKLYN - Two police officers walked into a Crown Heights deli for a cup of coffee on Wednesday morning and wound up arresting a man on a weapons charge.

Police say they entered the deli on Bergen Street around 2 a.m.

Officers say they asked about an unattended bag sitting on a cooler inside the store. A 22-year-old man said the bag was his and that the officers could move it. That's when officers say they noticed a loaded gun inside and placed the man under arrest

They are charging him with criminal



DUNAWAY hearing
DUNAWAY v. NEW YORK

~~442~~ 442 U.S. 200, 99 S. Ct.
2248 (1974)

MAPP Hearing

MAPP v. OHIO

367 U.S. 643, 81 S. Ct. 1684
(1961)

FROM: Willie Brown
190 Marcy Ave Apt 18E
Brooklyn, NY 11211



TO: PRO SE INTAKE Unit Room 206
UNITED STATES District Court
Southern District of New York
U.S. Courthouse
500 Pearl St.
New York, NY 10007

