

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

Ali-Abdullah-Sadiq

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

Former Police Commissioner, Bill Bratton  
City of New York, P.O. Charlie Ventingque  
Queens County District Attorney, R. Brown

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)*

**Complaint for Violation of Civil Rights**

(Non-Prisoner Complaint)

**CV 16-07140**

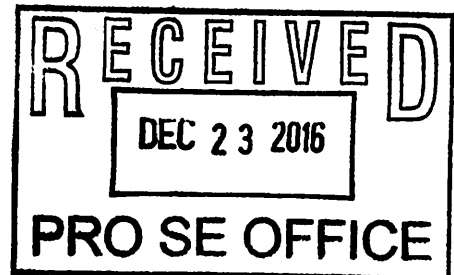
Case No.

*(to be filled in by the Clerk's Office)*

Jury Trial:  Yes  No  
*(check one)*

**DONNELLY, J**

**BLOOM, M.J.**



**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed *in forma pauperis*.

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name 'Ali-Abdullah-Sadig  
Street Address 194-07 Linden Blvd  
City and County ST. ALBANS New York, 11412  
State and Zip Code \_\_\_\_\_  
Telephone Number (718) 200-1355  
E-mail Address alitheconverted4@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name City of New York; Comptroller  
Job or Title Bureau of Law and Adjustment  
(if known) \_\_\_\_\_  
Street Address One Centre Street  
City and County New York  
State and Zip Code New York, 10007  
Telephone Number (212) 356-1000  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 2

Name Richard A. Brown (Individual & Corporate)  
Job or Title Queens County District Attorney  
(if known)  
Street Address 125-01 Queens Blvd.  
City and County Kew Gardens New York  
State and Zip Code New York, 11415-1568  
Telephone Number (718) 286-6000  
E-mail Address www.queensda.org  
(if known)

Defendant No. 3

Name New York City, Police Department  
Job or Title Policing  
(if known)  
Street Address 92-08 222 Street  
City and County Queens Village  
State and Zip Code New York 11428  
Telephone Number (718) 776-9090; 105<sup>th</sup> Pct. Tel. 40.  
E-mail Address N/A  
(if known)

Defendant No. 4

Name William Bratton (in his Official Capacity)  
Job or Title Former Police Commissioner  
(if known)  
Street Address NYC (Police Dept.) Comptroller's Office  
City and County New York City, New York County  
State and Zip Code 100 Church St. New York, City, 10007  
Telephone Number (212) 669-3916  
E-mail Address N/A  
(if known)

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- State or local officials (a § 1983 claim)
- Federal officials (a *Bivens* claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

My Fourth Amendment Constitution Protection, from unlawful, and false imprisonment; mental, and, emotional injury. Separate. five to six hours, detained. First Amendment Violation, as well.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A  
N/A  
N/A

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

The Police Officer, Charlie Ventingue, arrested me, on the basis of a false statement, from Seventh Day Adventist Pastor Ferron F. Francis, on September 24, 2015, with No reading of my Miranda Rights. (See Attachments) It was an involuntary detention. P.O. Officer, Charlie Ventingue, evidently did not have enough evidence, to have arrested me.

Attachment to page (4), as (4a); part (d)  
Continued:

2- I was put into a small Jail cell, losing freedom of liberty; suffering emotional pain; harm to personal dignity, in a New York City, 105<sup>th</sup> Precinct, holding cell.

3- Queens County District Attorney, prepared these false charges which they could not sustain, based on; Richard A. Brown's:

a) his personal malice, and, dislike of me, for fighting to keep my home; where his personal friend, and corrupt judge; Jaime A. Rios, heard a fraudulent foreclosure case (index number 24165/2008) which case, he should not have heard, because of, an ab initio, forged assignment of mortgage; filing complaints against, said former judge (Jaime A. Rios) which is Richard A. Brown's friend.

b) Richard A. Brown's Office, prepared this case maliciously; refusing to charge Ferron F. Francis, with filing false statements; even though the accusatory instrument in this case calls for a charge of; filing a false statement, if false statement can be proven, reasonably. Filing a false statement was proven!

4- New York City, is the employer of:

a) P.O. Charlie Venticigué;

b) Former Police Commissioner, William Bratton

(4a)

Attachment to page (4) as (4b)

C) The NYPD, functions as an agency of NYC, AND, IN NYC.  
5. William Bratton worked as Police Commissioner, at that time of occurrence.

6- Defendant:

name: Daniel Honoré, (phone) 718-291-8006

Job: or title: President of the North Eastern Conference of Seventh Day Adventist Churches.

address: 115-50, Merrick Blvd, #2, Jamaica New York 11434.

7- Ainsworth Joseph.

Job: ministerial Director, of The Seventh Day Adventist Churches, in the North Eastern Conference.

address: 115-50 Merrick Blvd, #2, Jamaica New York 11434, (718) 291-8006.

8. Defendant Ferron F. Francis

Job; or title: "Pastor".

street address: 45 Dobois Ave; Valley Stream New York, 11581, tel. (917) 776-1636.

(4b)

attached to page (4) as (4c)

Defendant no. 6, or Daniel Honore was sent several letters, informing him that Mr. Francis was continually in violation of the Seventh Day Adventist Church Manual, Chapter 10, page 114, and that he should be corrected.

Defendant no. 7 or Ainsworth Joseph, was also sent several letters, advising him that Ferron Francis was, and is, in violation of The Church Manual, Chapter 10, page 114 as well, as other violations.

(4c)

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful 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 more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

On September 24, 2015, at The 105<sup>th</sup> NYPD Precinct.

B. What date and approximate time did the events giving rise to your claim(s) occur?

On September 24<sup>th</sup>, 2015, app. 11:45 A.M  
There, or, about.

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

This Fernon Francis violated my First Amendment Rights.  
A Seventh Day Adventist Pastor, made false statements  
trying to make a case of aggravated harrasment  
because I disagreed, with his false teachings. His  
name Fernon F. Francis, he told the NYPD he feared  
for his life ... because I was a Muslim! He  
Associated me with ISIS!

He (Francis) told this NYPD, P.O. Charlie Ventingue  
on, or, about 9-23-2015; P.O. Charlie Ventingue arrested  
me, on this false statement; not reading me, my  
Miranda Rights; holding me, for about 5 hours in  
a cell. The DA's Office, failed to prove these charges,  
and failed, to supensed. District Attorney is bias, in  
this case, due to me, opposing his friend, Judge  
Jaime A. Rios, in a fraudulent foreclosure case.



**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Mental anguish; suffering, and pain. Now my wife of 47 years, does not want to go back to any church; period. She's lost confidence, AND is discouraged; discouraging me from going to Church!

**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I want this court to have Ferron F. FRANCIS to be charged, with filing a false statement; as the accusatory instrument states, should happen. I have the accusatory instrument, \$150,000.00; Punitive, should be \$1,000,000.00. Between \$120k to \$150k, are usual awards. Punitive, or Punishment, is for knowing better, and knowingly doing wrong. The Police, did not want to hear from me. He had the opportunity to arrest a black man, and he jumped on that opportunity. The DA should've known he had no case! The DA had 30 days to supersede and could not supersede.

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Dec. 23, 2016

Signature of Plaintiff Ali Abdullah-Sadiq

Printed Name of Plaintiff ALI-Abdullah-Sadiq