

**CV 18-2771**

**ORIGINAL**

FILED  
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2018 MAY -7 PM 4:10

MAUSKOPF, J.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

LEVY, M.J.

Wendell Stanislaus

Reynolds

Plaintiff,

**CIVIL RIGHTS COMPLAINT**

42 U.S.C. § 1983

[Insert full name of plaintiff/prisoner]

JURY DEMAND

YES ☒ NO ☐

-against-

NYPD OFFICER NAZIM SHIELD #16203

Parole OFFICER VICKY URENA #180

Supervisor P.O. John S. Kissel

Parole Hearing Officer JEFFERSON

Administrative LAW Judge Moravec

Parole Specialist Kallinikos "see attached"

Defendant(s).

[Insert full name(s) of defendant(s). If you need additional space, please write "see attached" and insert a separate page with the full names of the additional defendants. The names listed above must be identical to those listed in Part I]

I. Parties: (In item A below, place your name in the first blank and provide your present address and telephone number. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff Wendell Stanislaus Reynolds

If you are incarcerated, provide the name of the facility and address:

Manhattan Detention Center 125 White  
Street New York, Ny 10013

Prisoner ID Number: 1411800644

If you are not incarcerated, provide your current address:

Manhattan Detention Center 125 White  
Street New York, NY 10013

Telephone Number: \_\_\_\_\_

B. List all defendants. You must provide the full names of each defendant and the addresses at which each defendant may be served. The defendants listed here must match the defendants named in the caption on page 1.

Defendant No. 1

NAZIM SHIELD #16203

Full Name

NYPD OFFICER

Job Title

94<sup>th</sup> Precinct

Address

Defendant No. 2

Vicky Urena #180

Full Name

Parole OFFICER

Job Title

Address

Defendant No. 3

Supervisor John S. Kissel

Full Name

Parole OFFICER

Job Title

Address

Defendant No. 4

MS. JeFFerson

Full Name

Parole Hearing Officer

Job Title

Address

Defendant No. 5

MRS. Moravec

Full Name

Administrative LAW Judge

Job Title

Address

"See attached"

II. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 ½ by 11 sheets of paper as necessary.)

Where did the events giving rise to your claim(s) occur? At 1/24/18 on the North East corner of McGuinness Blvd and Bayard St, Brooklyn, NY My Constitutional rights was Violated by NYPD officer Nazim #16203 and E.S.L Officers.

When did the events happen? (include approximate time and date) At 8:36 am on Bayard St on 1/24/18 I Mr. Reynolds was traveling in my Private automobile enroute to Queens and was Consumed in detention by officer Nazim #16203.

Addendum

Defendant No. 6

Kallivikos

FullName

Parole Specialist

Job title

Address

Facts: (what happened?) ON January 24, 2018 at 8:36 am I Wendell Stanislaus Reynolds was traveling in my Private automobile enroute under my right to life, liberty and Pursuit of Happiness. Upon McGuinness Blvd until I was pulled over by a unmarked car and then Consumed in detention by NYPD officer Nazim #16203. as She approached my automobile She asked for my Credentials Unaware of any crime or assuming it's a Criminal investigation I issued the officer my Secured Party Creditor I.D and Constructive Notice as well as my Secured Party Creditor Declaration Notice. Declaring evidence and affidavits that I am operating under U.S. Constitution I then Let her, and other officers know Clearly that came upon the Scene "I come in peace I am not your enemy" as I started to record for my Safety. After my Property was Confiscated Without my Consent. The officers still decided to trespass against me and my Property Without articulable probable Cause reasonable Suspicion that I Committed, or was about to commit, a Crime against a human victim. NYPD E.S.U was called to the Scene to Continue the Wrongdoing, harm, damage and injury to me and my

"see attached"

II.A. Injuries. If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

Since I've been detained I Suffered mental anguish as well as Severe pain and Suffering due to my unlawful incarceration which led to my Personal injuries on D.O.C premises. A Concussion, Sprained right Leg and Shoulder, broken right ribs and fractured right elbow from gross Negligence.

Continued

## Addendum

Facts:

automobile by proceeding to break my windows with a crowbar. I then was in fear for my life by the public servants officers of the law I started to comply and, stated loudly while exiting the car with my hands up "I come in peace you are violating my Constitutional rights I am not resisting arrest" and, then was assaulted by the NYPD E.S.U team in which was recorded by officer Nazim #16203 and, then forced into detention/seizure/false arrest without a human victim. By NYPD officers public servants in which is a breach of their oath, and fiduciary duty, Coercion, duress, treason and corporate abuse. The suffering continued with barratry and deception, which is fraud when parole officer Vicky Urena #180 and her supervisor John, S, Kissel acted willfully and conspired with these charges and, damages me to report to their office to give a statement and then deceived me by entrapping me with multiple officers taking me into custody with excessive force on January 26, 2018 approximately 10:10 am. The conspiracy and suffering continued February 25, 2018 when NYPD officer Nazim #16203 and, Parole officer Vicky Urena #180 teamed together with Hearing Officer Jefferson to keep me unlawfully detained by finding probable cause. The officers then forwarded the conspiracy and wrongdoing to parole specialist Kallivikos and, Administrative Law Judge Moravec by via email then threatened I Wendell S, Reynolds with 18 months of prison time in which is cruel and unusual punishment for a \$188 fine for a alleged crime on March 13, 2018 in parole court keeping me under <sup>arrest</sup> ~~arrest~~.


III. Relief: State what relief you are seeking if you prevail on your complaint.

I Wendell Stanislaus Reynolds require the immediate restoration to freedom, and the freeze of all the defendants assets NYPD officer Nazim #16203, Parole Supervisor John S. Kissel, Parole officer Vicky Urena #180, Parole Hearing officer Jefferson, Parole specialist Kallinikos and Administrative Law Judge Moravec until the disposition of this claim is complete. AS well as Monetary Compensation of 30 million dollars for the remedy for all false claims and damages.

I declare under penalty of perjury that on MAY 2, 2018, I delivered this complaint to prison authorities at Manhattan Detention Center to be mailed to the United States District Court for the Eastern District of New York.  
(date)  
(name of prison)

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

Dated: MAY 2, 2018

  
Signature of Plaintiff

Manhattan Detention Center  
Name of Prison Facility or Address if not incarcerated

125 White street

New York, NY 10013

Address

1411800644  
Prisoner ID#