

ORIGINAL

CV19-4919

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

BRODIE, J.

MANN. M.J.

Norman Pudd

(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.)

SHield
(13666)

-against- Officer MARGARET
City of New York Tom Presect,
Kings County District Attorney
Office, New York City Police Dept.

(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.)

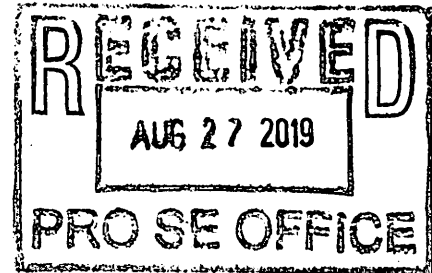
Complaint for Violation of Civil Rights

(Non-Prisoner Complaint)

Case No. _____

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

Jury Trial: ☒ Yes ☐ No
(check one)



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
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address

Norman Fludd
835 Ocean Avenue, Apt 2 H
Brooklyn, New York (11226) Kings
New York 11226
914-335-5087
NormanFludd@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
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address
(if known)

MARROQUIN 13666 ?
Officer: N.Y.P.D. 13666 ?
10th Precinct ?
Brooklyn New York
New York 11226
unknown
unknown

Defendant No. 2

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address
(if known)

New York City Police
Department: Corporal?
New York City: 70th Precinct
Brooklyn Kings County
Brooklyn, New York
Unknown
Unknown

Defendant No. 3

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address
(if known)

Municipal: Corporation?
District Attorney's Office?
Assistant District Attorney
that handled Criminal Case?
350 Judd Street
Brooklyn Kings County
New York 11201
Unknown
Unknown?

Defendant No. 4

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address
(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?

Due Process Civil Rights, False Arrest,
Malicious Prosecution, failure to
investigate

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?

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.

Like Police officers that arrested Plaintiff, Normal
should have conducted an investigation of facts,
and the Kings County District Attorney's office
retired and condoned such conduct by the
officers involved in Plaintiff's arrest after receiving
evidence that Plaintiff was innocent. D.A. Continued
to prosecute Plaintiff until case was dismissed?

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?

At 835 Ocean Avenue, Apt 3-H, Brooklyn, New York 11226 Plaintiff, Norman Fludd, was arrested by Officer Marroquin, 10th Precinct for Assault and other charges.

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

The alleged Assault Plaintiff, Norman Fludd, was arrested for occurred on May 23, 2016. Plaintiff Norman Fludd, was arrested on May 26, 2016.

- 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?)

On May 26, 2016, Officer Marroquin came to 835 Ocean Avenue Apt 3-H, and questioned Plaintiff, Norman Fludd, about an assault that allegedly occurred at 835 Ocean Avenue, Apt 3-H. I advised Officer Marroquin that I, Norman Fludd, did not commit an assault and never been inside Apartment 3-H. Officer Marroquin then questioned me about Parole or Probation. Plaintiff, Norman Fludd, asked Marroquin what Parole or Probation have to do with this incident? Officer Marroquin stated "You are under arrest." handcuffs was placed upon my wrist and I was transported to the 10th Precinct.

See Attached
And Exhibits A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z, AA, AB, AC, AD, AE, AF, AG, AH, AI, AJ, AK, AL, AM, AN, AO, AP, AQ, AR, AS, AT, AU, AV, AW, AX, AY, AZ, BA, BB, BC, BD, BE, BF, BG, BH, BI, BJ, BK, BL, BM, BN, BO, BP, BQ, BR, BS, BT, BU, BV, BW, BX, BY, BZ, CA, CB, CC, CD, CE, CF, CG, CH, CI, CJ, CK, CL, CM, CN, CO, CP, CQ, CR, CS, CT, CU, CV, CW, CX, CY, CZ, DA, DB, DC, DD, DE, DF, DG, DH, DI, DJ, DK, DL, DM, DN, DO, DP, DQ, DR, DS, DT, DU, DV, DW, DX, DY, DZ, EA, EB, EC, ED, EE, EF, EG, EH, EI, EJ, EK, EL, EM, EN, EO, EP, EQ, ER, ES, ET, EU, EV, EW, EX, EY, EZ, FA, FB, FC, FD, FE, FF, FG, FH, FI, FJ, FK, FL, FM, FN, FO, FP, FQ, FR, FS, FT, FU, FV, FW, FX, FY, FZ, GA, GB, GC, GD, GE, GF, GG, GH, GI, GJ, GK, GL, GM, GN, GO, GP, GQ, GR, GS, GT, GU, GV, GW, GX, GY, GZ, HA, HB, HC, HD, HE, HF, HG, HH, HI, HJ, HK, HL, HM, HN, HO, HP, HQ, HR, HS, HT, HU, HV, HW, HX, HY, HZ, IA, IB, IC, ID, IE, IF, IG, IH, II, IJ, IK, IL, IM, IN, IO, IP, IQ, IR, IS, IT, IU, IV, IW, IX, IY, IZ, JA, JB, JC, JD, JE, JF, JG, JH, JI, JJ, JK, JL, JM, JN, JO, JP, JQ, JR, JS, JT, JU, JV, JW, JX, JY, JZ, KA, KB, KC, KD, KE, KF, KG, KH, KI, KJ, KK, KL, KM, KN, KO, KP, KQ, KR, KS, KT, KU, KV, KW, KX, KY, KZ, LA, LB, LC, LD, LE, LF, LG, LH, LI, LJ, LK, LL, LM, LN, LO, LP, LQ, LR, LS, LT, LU, LV, LW, LX, LY, LZ, MA, MB, MC, MD, ME, MF, MG, MH, MI, MJ, MK, ML, MM, MN, MO, MP, MQ, MR, MS, MT, MU, MV, MW, MX, MY, MZ, NA, NB, NC, ND, NE, NF, NG, NH, NI, NJ, NK, NL, NM, NN, NO, NP, NQ, NR, NS, NT, NU, NV, NW, NX, NY, NZ, OA, OB, OC, OD, OE, OF, OG, OH, OI, OJ, OK, OL, OM, ON, OO, OP, OQ, OR, OS, OT, OU, OV, OW, OX, OY, OZ, PA, PB, PC, PD, PE, PF, PG, PH, PI, PJ, PK, PL, PM, PN, PO, PP, PQ, PR, PS, PT, PU, PV, PW, PX, PY, PZ, QA, QB, QC, QD, QE, QF, QG, QH, QI, QJ, QK, QL, QM, QN, QO, QP, QQ, QR, QS, QT, QU, QV, QW, QX, QY, QZ, RA, RB, RC, RD, RE, RF, RG, RH, RI, RJ, RK, RL, RM, RN, RO, RP, RQ, RR, RS, RT, RU, RV, RW, RX, RY, RZ, SA, SB, SC, SD, SE, SF, SG, SH, SI, SJ, SK, SL, SM, SN, SO, SP, SQ, SR, SS, ST, SU, SV, SW, SX, SY, SZ, TA, TB, TC, TD, TE, TF, TG, TH, TI, TJ, TK, TL, TM, TN, TO, TP, TQ, TR, TS, TT, TU, TV, TW, TX, TY, TZ, UA, UB, UC, UD, UE, UF, UG, UH, UI, UJ, UK, UL, UM, UN, UO, UP, UQ, UR, US, UT, UU, UV, UW, UX, UY, UZ, VA, VB, VC, VD, VE, VF, VG, VH, VI, VJ, VK, VL, VM, VN, VO, VP, VQ, VR, VS, VT, VU, VV, VW, VX, VY, VZ, WA, WB, WC, WD, WE, WF, WG, WH, WI, WJ, WK, WL, WM, WN, WO, WP, WQ, WR, WS, WT, WU, WV, WW, WX, WY, WZ, XA, XB, XC, XD, XE, XF, XG, XH, XI, XJ, XK, XL, XM, XN, XO, XP, XQ, XR, XS, XT, XU, XV, XW, XX, XY, XZ, YA, YB, YC, YD, YE, YF, YG, YH, YI, YJ, YK, YL, YM, YN, YO, YP, YQ, YR, YS, YT, YU, YV, YW, YX, YY, YZ, ZA, ZB, ZC, ZD, ZE, ZF, ZG, ZH, ZI, ZJ, ZK, ZL, ZM, ZN, ZO, ZP, ZQ, ZR, ZS, ZT, ZU, ZV, ZW, ZX, ZY, ZZ.

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.

*Not Committed Psychological Torture for being incarcerated for a crime said
Psychological Depression: [redacted] Ateid
and frightened when confronted by
Police Officers or Officers of Authority.
Psychological Problem with trusting women?
Psychological Problem with trusting the
Police Department in New York State, the
10th Precinct or any Police Department and the
Kings County District Attorney's Office, the Assistant
Relief*

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 find that Plaintiff, Norman Rudd,
[redacted] Civil Rights were violated by
the Kings County District Attorney's Office, the
City of New York, the 10th Precinct and Officer*

*Also: False Arrest & Malicious Prosecution against
all parties mentioned above. And Plaintiff be
awarded a sum of 200,000,000 Two Hundred Thousand
Dollars Compensation for Plaintiff incarceration
and each defendant be held accountable
with punitive damages of 20,000,000 Twenty
Hundred Thousand*

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: 8-27-19, 2019.

Signature of Plaintiff Norman Judd ?

Printed Name of Plaintiff Norman Judd ?

(Attachment)

2

Plaintiff, Norman Fudd, was Strip Searched and all Personal Item Confiscated and Vouched? Plaintiff was there transferred to Canteen Bookings in Brooklyn to await Arraignment on Multiple Charges of Assault? On May 7, 2016 Plaintiff arraigned and was Remanded to Rikers Island in lieu of 2,500.00 Dollars Bail?

Next Court Appearance on or About May 31, 2016, the Assistant District Attorney prosecuting the Plaintiff Case Requested that Plaintiff Bail be lowered to 1,500.00 Dollars? He breached the Request of the People over Plaintiff, Norman Fudd, Request to be Released and that Case be Dismissed?

This was egregious Conduct by the Assistant District Attorney representing the State of New York, the Kings County District Attorney Office and Office of the Kings County District Attorney. Failure to investigate the facts that were clearly before his eyes? Ratified and condoned by failing to request the Plaintiff, Norman Fudd, Release from Custody?

Plaintiff was eventually Released upon Bail paid by his family on or About June 1, 2016? The Plaintiff Arrest and the wait of over 3 months to Discover facts fabricated to cause Plaintiff arrest is a clear violation of Plaintiff Civil Rights and Due Process? False Arrest and Malicious Prosecution? ⑨

Finally, After A little over 3 months, on August 29, 2016, the Case against Plaintiff Norman Pludd was Dismissed?

Wow, Just like that, Bottom and Don't Come Back Court Cause the Case is Over? See (Attached Exhibit A.)

Hereby we need to find out how Did all this happen? A Violation of Plaintiff Norman Pludd, Civil Rights Due Process (False Arrest) and Malicious Prosecution from the very inception of the Beginning Starting with Lt. Paul Tom Decret, Municipal and Officer Marroquin? And, the Ratified and Condone Conduct by the Kings Court District Attorney's Office of Officer Marroquin's inadequate Conduct? They were Aware of the Violations from the very Beginning too & And Continued to Prosecute while aware of these violations mentioned & previously mentioned, and facts of Plaintiff, Norman Pludd, Innocence? Finally Are mentioned Parties were aware or could have obtained info that would have made them aware that Plaintiff Norman Pludd was innocent of the alleged assault that took place on May 23, 2016, inside of 835 Deane Avenue Apartment #3-H, Brooklyn, NY 11226

Exhibit A³

CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF KINGS

THE PEOPLE OF THE STATE OF NEW YORK
VS

CERTIFICATE OF DISPOSITION
NUMBER: 738071

FLUDD, NORMAN

Defendant

11/01/1963

Date of Birth

835 OCEAN AVENUE

Address

4491414N

NYSID Number

BROOKLYN

NY

City

State Zip

05/26/2016

Date of Arrest/Issue

Docket Number: 2016KN031533

Summons No:

PL 120.00 01 AM, 110-PL 120.00 01 BM, PL 120.15 00 BM, PL 240.26 01 V,
Arraignment Charges

Case Disposition Information:

<u>Date</u>	<u>Court Action</u>	<u>Judge</u>	<u>Part</u>
08/29/2016	DISM - SPEEDY TRIAL PROVISIONS	GERSTEIN, M	DV1

NO FEE CERTIFICATION

☐ GOVERNMENT AGENCY ☐ COUNSEL ASSIGNED

☐ NO RECORD OF ATTORNEY READILY AVAILABLE. DEFENDANT STATES COUNSEL WAS ASSIGNED

SOURCE ☐ ACCUSATORY INSTRUMENT ☐ DOCKET BOOK/CRIMS ☐ CRC3030 [CRS963]

I HEREBY CERTIFY THAT THIS IS A TRUE EXCERPT OF THE RECORD ON FILE IN
THIS COURT.

FRASER, C

COURT OFFICIAL SIGNATURE AND SEAL

07/15/2019

DATE

FEE: NONE

(CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE COURT
SEAL OVER THE SIGNATURE OF THE COURT OFFICIAL.)

AH04

COUNTY: KINGS

CRIMS APPEARANCE HISTORY
PERSONAL INFORMATION

07/15/2019
8194

OPTION SELECTED: ALL APPEARANCES

CJTN: 67669770 Q

NYSID #: 04491414 N

DOCKET: 2016KN031533

ARREST DATE: 05/26/2016

ARREST #: K16638983

INCIDENT DATE: 05/23/2016

ARREST TIME: 07 : 10

INCIDENT TIME: :

NAME : FLUDD, NORMAN

NAME TYPE: I

AKA #1 :

AKA #2 :

DOB: 11/01/1963

RACE: B

ETHNIC: N

SSN:

HGT: 6

WGT: 175

EYES: BRO

HAIR: BLK

BLOOD ALCOHOL LEVEL:

APO NAME : MARROQUIN

TAX REG # :

AGENCY: NYPD

COMMAND: 70

SHIELD # : 13666

COMMAND:

MESSAGE: