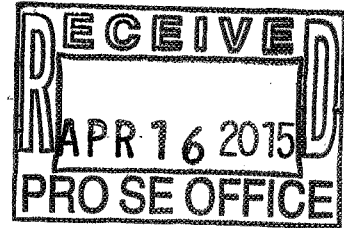


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



Keita Diango,

Plaintiff

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

COMPLAINT

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

-against-

THE CITY OF NEW YORK,
New York City Police Department, et al.,

Police Officer Anderson, Kareem; Shield#1468

And Police Officer Restrepo, Shield# N/A

In their official and individual capacities.

Jury Trial: Yes No
(check one)

Defendant(s).

15CV3106

(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: Keita Diango v NYC Police Dep't, et al, Police Officer Kareem Aanderson, Shield#1468; Officer Restrepo /, Shield# N/A

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 Keita Diango
ID # 15R0047
Current Institution Ogdensburg Correctional Facility
Address One Correction way/ Ogdensburg, NY 13669

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 Police Officer Kareem Anderson Shield # 1468
Where Currently Employed NYC Police Dep't
Address 33rd Pct, NY NY 10032

Defendant No. 2 Name Police Officer Restrepo Shield # N/A
Where Currently Employed NYC Police Dep't
Address 33rd Pct, NY NY 10032

Defendant No. 3 Name NYC Police Dep't Shield # N/A
Where Currently Employed City of New York
Address One Police Plaza, NY NY 10013

Defendant No. 4 Name THE CITY OF NEW YORK Shield # N/A
Where Currently Employed _____
Address New York, NY.

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?
The claim did not occur in a Correctional Institution, but actually occurred at 2106 Amsterdam Avenue NY NY 10032.

B. Where in the institution did the events giving rise to your claim(s) occur?
I was in front of a Tenement Building at the above stated address, 2106 Amsterdam Avenue NY NY 10032.)

C. What date and approximate time did the events giving rise to your claim(s) occur?
July 4th, 2012, at approximately 1:43am.

D. Facts: While setting in a automobile with my girl-friend on the 4th of July 2012, I was parked in front of 2106 Amsterdam Avenue, NY NY, I was approached by two NYC Police Officers by the name of Police Officer Kareem Anderson, Shield #1468, and Police Officer Restrepo, Shield # N/A); And without any probable cause, I was falsely arrested.

What happened to you?

Who did what?

I was falsely arrested for allegedly possessing a forged instrument, i.e., a (Temporary license plate). PL. § 170.10, Sub. Div. 03, a Class D Felony; and released on my own recognizance.

Was anyone else involved?

I was arraigned on the 5th of July 2012 for a Forged Instrument in the 3rd degree, PL § 170.20, a Class A Misdemeanor; Docket #2012NY052236.

Who else saw what happened?

The Above mentioned Police Officers filled out a sworn false felony complaint against me for possession of a fake Temporary New Jersey License Plate, and never produced any factual evidence to support the sworn Felony complaint.

I was incarcerated for 13 months, from September 26th, 2012, until the eventual dismissal of the case on 11/13/13.

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. The injuries sustained by plaintiff as a result of the negligence, false arrest, false imprisonment, and malicious prosecution, invasion of privacy and violation of my Constitutional Rights are as follow: Severe mental anguish, and emotional-distress; humiliation and emarrassment, and loss of my freedom, and personal civil rights. My inability to conduct normal activities; indignities, scorn and disgrace, and plaintiff was caused to be incarcerated for 13 mobths, from 11/26/12, until, 11/13/13 upon dismissal.

IV. Exhaustion of Administrative Remedies: * Damages Claimed in the amount of: \$5,000.000.*

N/A
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 ___

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).

I was detained at Bklyn Detention Center for 13
Months because of this false arrest.

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

Yes ___ No ___ Do Not Know ___ N/A

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 ___ Do Not Know ___ N/A

If YES, which claim(s)? _____

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

Yes ___ No ___ N/A

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 ___ N/A

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

N/A

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

2. What was the result, if any? N/A

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. N/A

F. If you did not file a grievance:

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

N/A

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: N/A

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

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

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). The injuries sustained by plaintiff as a result of the negligence, false arrest, false imprisonment, and Malicious prosecution, invasion of privacy and violation of my Constitutional Rights are as follow: Severe mental anguish, and emotional distress; humiliation and embrrassment, and loss of wages, and loss of freedom, and personal civil rights, and his inability to conduct normal activities; indignities, scorn and disgrace, and plaintiff was caused to be incarcerated for 13 months, from September 26, 2012, until November 13, 2013 upon dismissal of the indictment on (30.30 Speed Trial Violation) pursuant to CPL § 30.30.

Damages Claimed:

\$5,000.000.00. 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 X

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: /NO!

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes ___ No ___

If NO, give the approximate date of disposition _____

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

On other claims

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

Yes ___ No X

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: NO!

Plaintiff _____

Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending? Yes ___ No ___

If NO, give the approximate date of disposition _____

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

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

Signed this ___ day of March, 2015

Signature of Plaintiff

Keita Diango

Inmate Number

15R0047

Institution Address

One Correction Way
Ogdensburg Correctional Facility
Ogdensburg, NY 13669-2288

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 31 day of March, 2015, 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:

Keita Diango
Mr. Keita Diahgo/Pro-Se Litigant

Cc file