UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK	
TRISTEN SAUNDERS-HALL	)
Plaintiff,	COMPLAINT JURY TRIAL DEMANDED
-against-	CIVIL ACTION No. :
DETECTIVE PAUL SULLIVAN, OFFICER ARMANDO RIVAS,	)
and SARGENT YOEL HIDALGO,	)
INDIVIDUALLY,	)
And as Employees of the City of New York Police Department,	)
	)
Defendants.	)

Plaintiff, TRISTEN SAUNDERS-HALL, by and through his attorney, Ryanne Konan, hereby affirms to the best of his knowledge, under the pains and penalties of perjury, as and for his First Complaint in this action against the Defendants DETECTIVE PAUL SULLIVAN, and Officer ARMANDO RIVAS, and Sargent YOEL HIDALGO as follows:

## NATURE OF CLAIMS

- Plaintiff in the above captioned matter was a victim of false arrest and malicious prosecution, when the City of New York Police Department, through its officers Paul Sullivan, Armando Rivas, and Yoel Hidalgo arrested Plaintiff on February 20, 2014, without probable cause.
- Plaintiff was maliciously prosecuted by Defendants in Bronx County Supreme Court without probable cause.

 Accordingly, this action is brought to remedy a violation of the Fourth Amendment of the United States Constitution, actionable under 42 U.S.C. §1983.

## JURISDICTION AND VENUE

- This action arises under the Fourth Amendment of the United States Constitution actionable under 42 U.S.C. § 1983.
- 5. This Court has jurisdiction over this matter pursuant to 28 USC §§ 1331, 1343(a)(3) and (4), and 1367(a).
- Venue is proper in this district pursuant to 28 U.S.C § 1391(b)(2) because a substantial part of the
  events or omissions giving rise to this action occurred in this district.

## **PARTIES**

- Tristen Saunders-Hall is a citizen of United States currently resides at 701 Gates Avenue, Brooklyn, New York.
- 8. Defendant Paul Sullivan, was a Detective at the City of New York Police Department at the time of the incident and upon information and belief, a citizen of New York. Officer Paul Sullivan had an office at the 50<sup>th</sup> precinct located at 3450 Kingsbridge Avenue, Bronx, New York 10463.
- Defendant Officer Armando Rivas was a police officer at the City of New York Police Department
  at the time of the incident and upon information and belief, a citizen of New York. Officer Armando
  Rivas had an office at the 50<sup>th</sup> precinct located at 3450 Kingsbridge Avenue, Bronx, New York
  10463.