

JUDGE SWAIN

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

18 CV 11002

Yi Sun

Write the full name of each plaintiff.

 CV
(Include case number if one has been assigned)

-against-

COMPLAINT

New York City Police Department

Administration for children's services of the city of New York

Hugh H. Mo & The Law Firm of Hugh H. Mo, P.C

Scott Richman & Threadtex Inc

Do you want a jury trial?
 Yes No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

S.D. OF N.Y.
NOV 26 11 11 AM '18
CLERK OF COURT

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *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. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

Federal Question

Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

- 1) Gross violations of human rights; please find attached
- 2) Principles and Guidelines on Human Rights;
- 3) Violate human rights with 'Deliberate maiming & inflicting grievous bodily harm';
- 4) Violation of human rights & 'the privilege against self-incrimination'.

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of _____
 (Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

N

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of the State of _____

A

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

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

Yi		SUN
First Name	Middle Initial	Last Name
10 EAST 116 th STREET, APT # 3A		
Street Address		
NEW YORK	NEW YORK	10029-1061
County, City	State	Zip Code
(212) 810-0556	SUNYICULTURE@yahoo.com	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: New York City Police Department
 First Name _____ Last Name _____
NYPD is the primary law enforcement and investigation agency within the five boroughs of New York City.
 Current Job Title (or other identifying information) _____
1 Police Plaza Path, New York, New York
 Current Work Address (or other address where defendant may be served) _____
New York New York 10007
 County, City State Zip Code

Defendant 2: Administration for Children's Services of the City of New York
 First Name _____ Last Name _____
ACS is a governmental agency that provides welfare services to children and their families in the City of New York.
 Current Job Title (or other identifying information) _____
150 William Street, New York, New York
 Current Work Address (or other address where defendant may be served) _____
New York New York 10038
 County, City State Zip Code

Defendant 3: Hugh H. MO (and the Law Firm of Hugh H. MO, P.C.)
 First Name _____ Last Name _____
Mr. MO is the principal at the Law Firm of Hugh H. MO, P.C.
 Current Job Title (or other identifying information) _____
225 Broadway, Suite 2702
 Current Work Address (or other address where defendant may be served) _____
New York New York 10007-3080
 County, City State Zip Code

Defendant 4: Scott Richman (and Threadtex Inc)
 First Name Scott Last Name Richman
 who was/is the boss of the fabric company in New York City, his business profile
~~is owner of Threadtex Inc~~
 Current Job Title (or other identifying information)
641 Lexington Avenue, 6th Floor, New York, NY
 Current Work Address (or other address where defendant may be served)
New York New York 10022
 County, City State Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: 109th Precinct; 72nd Precinct; 90th Precinct; 108th Precinct; 25th Precinct; 17 Precinct;
Manhattan special victims squad; NYPD Internal Affairs Bureau in Queens;
the meeting room of Threadtex Inc; Chinatown; my old address etc (please find enclosed)

Date(s) of occurrence: from October 26, 1998 to October 3, 2018

FACTS: (Please find enclosed)

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed. (Please find enclosed) page 7 ~ page 71

My Verified Complaint

- ① The reasons that I vowed to file a lawsuit against the 'Defendant 1' to Federal Court.
(Page 7 ~ Page 22)
- ② The reasons that why I would file a lawsuit against the 'Defendant 2' to Federal Court.
(Page 22 ~ Page 57)
- ③ The reasons that why I would file a lawsuit against the 'Defendant 3' to Federal Court
(Page 57 ~ Page 69)
- ④ The reasons that why I would file a lawsuit against the 'Defendant 4' to Federal Court.
(Page 69 ~ Page 70)
- ⑤ Conclusion (Page 70 ~ Page 71)

I, Yi Sun, the Plaintiff - Petitioner - complainant, who was/am a special victim in a series
of sexual assault cases in New York, but these cases always closed or and dismissed by New York
City Police Department, because these rapists were/are police detectives, police lieutenant, or and
the friend - client of the 'deputy police commissioner of trial' in NYPD. It is common for police
officers to shield each other from punishment, but the phenomenon reaches an extreme in NYPD,
especially NYPD Internal Affairs or and 'Manhattan special victims squad.' Page 5

Since I got sexual assault multiple times in the past. I was/am under a great pressure in life. I feel sad and down nearly all of the time. I am currently still suffering from difficulty in sleep, having flash-backs and intense psychological distress at exposure to male figures what resemble me perpetrators from the past. These symptoms are consistent with PTSD and let me sad and I feel that my day-in and day-out misery comes from these bad men and I feel the loss of enjoyment of life. I feared to touch on distressing memories.

However, I am longing to end the nightmare and I have a bright future. I hope I can finish my Master of Arts in the country. I hope one day, New York can be another space for me to realize my dream. I think that it is time for me to step up and be a responsible witness with a brave heart. I must stand up for the rights of me and other victims.

I believe that U.S. Federal Judiciary takes honesty and trust very seriously. You have resposed trust in the Judicial power, which, in order that it might be trustworthy; you have made us respectable, as disinterested, and as independent as was practicable. No one is above the law: I believe that you plays no favorites. You tries to get rid of the entitlement mentality.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Nothing could ever undo the wrong, hurt or cure the pain that these defendants had inflict on me (Plaintiff, Yi Sun), these injuries sustained by plaintiff include:

1) Sexual assault; 2) sexual abuse; 3) sexual exploitation; 4) sexual molestation; 5) unspeakable abuse; 6) Emotional distress and stress; 7) sleeplessness; 8) Depression; 9) Anxiety; 10) Broken heart syndrome & excessive sad; 11) Post Traumatic Stress Disorder; 12) Loss of enjoyment of life; 13) Severe pain and suffering, etc. (Please find enclosed). Page 71 & Page 72.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Money is not the be-all-and-end-all of my intentions in the case. However, it is shameful for these defendants not to apologize and compensate to the victim for his/their delinquent action and crimes. I didn't have a demand that I request for. But I would show my all mental pain and anguish to Honorable Justices at the Federal Court and Jury. The trauma of these events brought back my ill-health more times and again. The wound in the victim's heart could never be healed. According to the previous cases, if I need tell the court about my demand by the court's order. At the time, my answer is total demand \$ 239,000,000 in the claim about the number of mental injury compensation payment in the case.

(Please find enclosed. Page 72 ~ Page 74).

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change 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 Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. 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.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>NOVEMBER 26, 2018</u>		<u>Yi Sun</u>
Dated		Plaintiff's Signature
<u>Yi</u>		<u>SUN</u>
First Name	Middle Initial	Last Name
<u>10 East 116th Street, Apt # 3A</u>		
Street Address		
<u>NEW YORK</u>	<u>NEW YORK</u>	<u>10029-1061</u>
County, City	State	Zip Code
<u>(212) 810-0556</u>	<u>SUNYICULTURE @ Yahoo. COM</u>	
Telephone Number	Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

Yes No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.