

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Shareef Brown 237793

19 CV 261

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

-against-

COMPLAINT

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

Jury Trial: Yes No
(check one)

1) The City of New York; 2) Detective
John Doe of New York Police
Department - Bronx, New York; 3)
District Attorneys John and Jane
DOE

Defendants City of New York
and Detective John Doe are sue individually
and officially - District Attorney John
DOE are sued individually.

(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:

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 SHAREEF BROWN
ID# 237793
Current Institution Westchester County Jail
Address 10 Woods Road
Valhalla, NY 10595

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 The City of New York Shield # _____
Where Currently Employed City Corporation
Address 100 Church St. 6th Fl
New York, New York 10007

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COMMUNICATIONS SECTION
JAN 10 2019

Defendant No. 2 Name Det. John Doe Shield # _____
 Where Currently Employed New York Police Department
 Address 100 Church St 6th Fl.
New York, New York 10007

Defendant No. 3 Name District Attorney John Doe Shield # _____
 Where Currently Employed Bronx County District Attorney
 Address _____

Defendant No. 4 Name District Attorney Jane Doe Shield # _____
 Where Currently Employed Bronx County District Attorney
 Address _____

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?
None

B. Where in the institution did the events giving rise to your claim(s) occur?
NA

C. What date and approximate time did the events giving rise to your claim(s) occur?
Nov. 14, 2017

What happened to you?

Who did what?

Was anyone else involved?

Was any force or fear applied?

D. Facts: On the date of November 14, 2017 I was a patron at Sin City Strip club along with two friends, Miguel Vargas and Amber, for my 25th birthday when my friend got into a verbal argument with another patron who is a personal friend of his. This argument occurred directly outside, before Sin City Strip club bouncers, and I attempted to intervene as the bouncers were standing around as if a fight was not unfolding. I approached the man, and he threw his hands up then reached in his pants as though he was reaching for a weapon, at that point I started to punch this man in the face to avoid a potential assault with a possible weapon upon me. While fighting this individual Miguel and Amber picked up the man I was fighting with a book bag and left the scene with the bag. A short time later, the fight ceased and I fled the fight, as I was severely drunk, and my clothing was bloody and ripped. I ran to a nearby park and fell asleep in a bush. I awoke approximately a hour later and sobbered up enough to walk back to Sin City Strip club and asked the bouncer to call me a cab as I was still drunk. The bouncer pretended to call me a cab and instead called police. Then without cause the bouncer (Hispanic male) tackled me to the ground and held me for the police to come. Note: The entire incident i.e. the initial fight and bouncer incident were captured by surveillance footage, currently in the possession of N.Y.P.D including Detective and District Attorney

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. LOSS of liberty, loss of privacy,

violation of rights,

IV. Exhaustion of Administrative Remedies:

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

Continued Facts Page 1

I was subsequently arrested and charged with Robbery in the second degree for the fight that occurred as stated above. Also, my money approximately \$4,000.00 was confiscated from my person and alleged to be money stolen from the man I was fighting with despite, that I never left the immediate scene as evidenced by the fact that I fled not wearing a shirt as my shirt was ripped off during the fight, and I returned still not wearing a shirt and drunk.

I was then confined, I was aware of this confinement, I did not consent to it, and the confinement was not priviliged or surveillance video in the police defendants possession (during my arrest) indicated me of committing a robbery.

Note: At no time did I enter into an agreement with Miguel or Amber to deprive the man of his bag, Miguel and Amber did so without my knowledge and on their own.

I was subsequently housed in the custody of the New York City Department of Corrections for 30 days, where I loss my Liberty, Freedom, Privacy, respect of my family, and all my rights that are expected by a free citizen.

During my confinement I endured several strip searches, gang violence, daily violence, and separation from my family and friends.

I was bailed out through a Bail Bonds as my bail was set at approximately \$50,000.00. As such, my family i.e. Sister loss approximately \$3,500.00 to bail me out.

The above said case was dismissed in June 2018 as the Judge stated "this case has been going on too long, yet the people aren't ready sorry Mr. Brown case dismissed".

As such I was falsely arrested, maliciously prosecuted, and falsely imprisoned.

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).

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

Yes ___ No ___ Do Not Know ___

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 ___

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 ___

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 ___

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

1. Which claim(s) in this complaint did you grieve? _____

2. What was the result, if any? _____

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. _____

F. If you did not file a grievance:

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

my claims occurred in the Bronx, and
Supreme Court

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: _____

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

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

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).

Compensatory Damages against all defendants jointly and severally in the amount of \$ 500,000.00; punitive damages against all defendants jointly and severally in the amount of 600,000.00; Nominal Damage \$; and Declaratory Judgment that my rights were violated

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

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:

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

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:

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 3rd day of January, 2019.

Signature of Plaintiff

Shameek Brown

Inmate Number

237793

Institution Address

P.O. Box #10

Valhalla, NY 10595

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 3rd day of January, 2019, 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:

Shameek Brown

SHAREAF BROWN 237793
P.O. BOX #10
VALHALLA, NY 10595



237793
VALHALLA NY

UNITED STATES DIST. COURT
SOUTHERN DISTRICT OF NEW YORK
Attn: PRO SE CLERK
500 Pearl Street
New York, NY 10007

LEGAL MAIL

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