

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

# UNITED STATES DISTRICT COURT

for the

Western District of Texas

Waco Division

Justin Daniell

Plaintiff(s)

*(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.)*

-v-

CLIFF DAVIS see attached

Defendant(s)

*(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.)*

Case No.

6:25-CV-508-ADA-DTG  
*(to be filled in by the Clerk's Office)*

Jury Trial: *(check one)*

Yes

No

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

### 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.

Except as noted in this form, 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.

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**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 JUSTIN DANIELL  
 Address 5500 HWY 84 E  
EARLY TX 76802  
City State Zip Code  
 County BROWN  
 Telephone Number 325 998 4223  
 E-Mail Address Bdaniell1149@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 CLIFF DAVIS  
 Job or Title (if known) FBI SPECIAL AGENT  
 Address UNKNOWN  
City State Zip Code  
 County UNKNOWN  
 Telephone Number \_\_\_\_\_  
 E-Mail Address (if known) \_\_\_\_\_

Individual capacity  Official capacity

Defendant No. 2

Name John Doe #1  
 Job or Title (if known) FBI Special Agent  
 Address UNKNOWN  
City State Zip Code  
 County UNKNOWN  
 Telephone Number \_\_\_\_\_  
 E-Mail Address (if known) \_\_\_\_\_

Individual capacity  Official capacity

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Defendant No. 3

Name JOHN DOE # 2  
 Job or Title (if known) FBI SPECIAL AGENT  
 Address UNKNOWN  
 \_\_\_\_\_  
 City State Zip Code  
 County UNKNOWN  
 Telephone Number \_\_\_\_\_  
 E-Mail Address (if known) \_\_\_\_\_

Individual capacity  Official capacity

Defendant No. 4

Name John Doe # 3  
 Job or Title (if known) F.B.I Special Agent  
 Address UNKNOWN  
 \_\_\_\_\_  
 City State Zip Code  
 County UNKNOWN  
 Telephone Number \_\_\_\_\_  
 E-Mail Address (if known) \_\_\_\_\_

Individual capacity  Official capacity

**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):

- Federal officials (a *Bivens* claim)
- State or local officials (a § 1983 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?

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?

Federal Agents destroyed an official F.B.I Device, Then burglarized my home on February 6 2024. Fabricated

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a video, then applied for a fraudulent warrant, indicating that I had the device, destroying my home. I was assaulted and threatened by another agent.

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.

All defendants were acting in their official capacities while working for F.B.I when the incident occurred, attempting to falsely arrest me.

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?

5500 Hwy 84 E Early, TX 76802  
2701 Harrison St. Waco, TX 76705

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

Feb 6 2024  
Oct 3 2025

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 February 6, 2025, an F.B.I agent, known hereinafter as John Doe #1 in the complaint, burglarized my home located at 5500 Hwy 84 East in Early, TX, and planted an official

F.B.I cellular device inside of my home, directly in front of the window where F.B.I conducted official video surveillance. The device belonged to another agent I know as Cliff Davis of Corpus Christi F.B.I. Cliff Davis remained across the highway at a trailer located at 5501 Hwy 84 E Early, TX where F.B.I conducted official video surveillance of my home from, and fabricated the video as this was done. John Doe #1 had put on my green plaid jacket and hat as he planted the cellular device to make himself appear as me. After John Doe #1 planted the device in an insulation panel opposite the window where F.B.I official cameras shine through, he slashed several other insulation panels in my home, and poked holes in my couch. After leaving, Cliff Davis and John Doe #1 forwarded the fabricated video to S.A.I.C. Corpus Christi F.B.I, who then submitted it to U.S. District Court Corpus Christi Division, of Southern District of Texas to obtain a fraudulent warrant intended to raid my

home. S.A.I.C. Corpurs Christi F.B.I, hereinafter known as John Doe #3, had ordered John Doe #1 to travel to my home in Early, TX, to commit the burglary, and to fabricate the evidence. After receiving the video, John Doe #3, with full knowledge that it was fabricated, obtained a fraudulent warrant to raid my home. U.S. District Court Southern District of Texas Corpus Christi Division maintains meticulous records of warrant applications and warrants issued making it impossible for the defendants to deny these claims. After applying for the warrant on Feb. 6, 2025, F.B.I realized that I had thumbprinted into a counseling class over 50 miles away in Eastland, TX, and that they could not execute the warrant. Multiple other agents assisted Cliff Davis in the destruction of his device. Records exist with F.B.I and the other agents can only be determined through disclosure and discovery

Multiple other agents also participated in the burglary and fabrication of the video and can only be determined through disclosure and discovery. F.B.I maintains records pertaining to the destroyed device, and issued Cliff Davis a new one. John Doe #1 carried his official F.B.I cellular device to my home on February 6, 2025, which bears a constant GPS signal and will show him present inside my home at the time of the video, which was submitted to U.S. District Court to obtain a warrant. Cliff Davis later broke back into my home to retrieve the planted device after realizing he could not execute the warrant. I made an OIG complaint documenting the exact time and date this occurred. F.B.I recorded him do this. All other F.B.I participants instrumental in the destruction of his device, the burglaries, and the video which was used to obtain a warrant can only be determined through litigation. Later, on October 3, 2025, my Father Barry Daniell

and I traveled to 2201 Harrison Street in Waco, TX, to look at a vehicle. After my father walked inside the gate, and as I sat in the vehicle, an F.B.I agent known hereinafter as John Doe # 4 pulled up beside me in a late model grey S.U.V., and threw an unopened beer can at me that hit me in the arm and busted before falling to the ground. As he sped away, he yelled at me "Dont try to sue F.B.I." I had a laceration and bruising from the incident. I documented this incident by writing O.I.G but never recieved a response. I was scared to call the police or take any further action. I did see his S.U.V., it was a Toyota Land Cruiser. The first two liscence plate numbers were W2 and the last one was 3.

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**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.

I was lacerated and bruised and my property was vandalized and burglarized. I have pictures of the damaged property and filed a police report on the day that it occurred. As stated above, I was threatened and in fear to seek help.

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**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.

MONEY DAMAGES / JURY TRIAL

I simply want a jury to decide the amount of damages - my property was burglarized and vandalized and I was assaulted.

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**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: 12.2.25

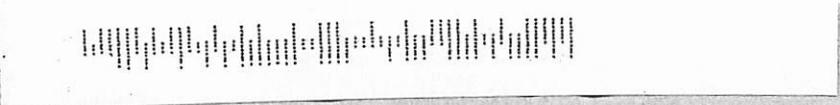
Signature of Plaintiff *Justin Danie II*  
Printed Name of Plaintiff JUSTIN DANIE II

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_  
Printed Name of Attorney \_\_\_\_\_  
Bar Number \_\_\_\_\_  
Name of Law Firm \_\_\_\_\_  
Address \_\_\_\_\_  
\_\_\_\_\_  
City State Zip Code  
Telephone Number 325 998 4223  
E-mail Address Bdanie II 1249@gmail.com

5500 Hwy 84 E  
Early, TX 76802



6:25-CV-568

**RECEIVED**  
DEC 08 2025  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY \_\_\_\_\_ DEPUTY CLERK

U.S. DISTRICT COURT  
Western District of Texas  
Waco Division  
800 Franklin Ave, Rm 380  
Waco, TX 76701