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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOSEPH CABIBBO

Plaintiff

vs.

**BOROUGH of FAIR LAWN, BOROUGH of
FAIR LAWN POLICE DEPARTMENT,
CLARE CABIBBO, CAPTAIN PATTERSON,
SGT. A. FERREIRA, SGT. LEITMAN, JOHN
DOE 1, (police officers involved in the arrest of
Mr. Cabibbo), JOHN DOE 2, (agent, servants,
and/or employee of the Borough of Fair Lawn
who participated in communication leading up to
and subsequent to the arrest of Mr. Cabibbo),**

Defendants.

CASE NO.:

COMPLAINT and JURY DEMAND

INTRODUCTION

JURISDICTION and VENUE

1. This is an action for money damages pursuant to 42 U.S.C. Section 1983 and the Fourth and Fourteenth Amendment of the United States Constitution, and of the Common Law of the State of New Jersey, against the defendants set forth. Jurisdiction is based upon 28 U.S.C.

Section 1331 and 1343, and on the pending jurisdiction of this court to entertain claims arising under state law.

2. It is alleged that the individual police officer defendants made an unreasonable seizure of the person of the plaintiff, violating his rights under the Fourth and Fourteenth Amendments to the United States Constitution, and that these defendants engaged in a malicious prosecution of the plaintiff. It is further alleged that these violations and torts were committed as a result of policies and customs of the Borough of Fair Lawn, the Borough of Fair Lawn Police Department.

Plaintiff, Joseph Cabibbo residing at Avenue, in the Borough of Bloomingdale,
County of Passaic, State of New Jersey, by way of complaint against the defendants says:

FACTUAL BACKGROUND

1. During all relevant time frames, Mr. Joseph Cabibbo (herein after referred to as “Plaintiff”) was the x-husband of defendant of Ms. Clare Cabibbo (herein after referred to as Ms. Cabibbo).
2. During all relevant time frames, Ms. Cabibbo was the Court Administrator in the Borough of Fair Lawn.
3. On October 15, 2014, despite the plaintiff not being present at the hearing, a final restraining order was entered against him in the Passaic County Superior Court.
4. In the end of April, 2015 the plaintiff appeared at the defendant, “Fair Lawn Police Department” (herein after referred to as “Fair Lawn”) with the purpose of signing a criminal harassment complaint against Ms. Cabibbo.
5. At that time, the plaintiff met with the Captain of the Fair Lawn Police Department, defendant, Ronald Patterson (herein after referred to as “Patterson”).
6. Patterson at that time along with another officer, took down all the information and advised plaintiff they would get back to him. Approximately two (2) weeks later Patterson contacted the plaintiff and advised that they were still awaiting information from other agencies before they could process the complaint. Subsequently, approximately one (1) week later Patterson advised the plaintiff that the investigation was completed and that the results were being forwarded to the Borough Administrator, to process the complaint.
7. After the plaintiff did not hear anything back, several calls were made to the Borough Administrator’s office at which time messages were left and the calls were never returned.

7. After the plaintiff did not hear anything back, several calls were made to the Borough Administrator's office at which time messages were left and the calls were never returned.

8. On June 12, 2015 the plaintiff appeared at the Bergen County Prosecutor's office to file a criminal complaint against Ms. Cabibbo, and to determine whether a complaint had been filed as previously referenced. At that time the plaintiff was met by a James Harris and was instructed to appear at the Central Municipal Court in Hackensack to file the complaint.

9. The plaintiff entered the Central Municipal Court building and spoke with a Carmella Migale who advised the plaintiff that there was no reason why a complaint would be sent to the Borough Administrator and she herself contacted Fair Lawn in front of the plaintiff and was told that there was no complaint ever filed by the plaintiff.

The plaintiff continued to indicate that he wanted this complaint filed, and he was told that he must appear at the Borough of Fair Lawn to file the complaint. The plaintiff did advise that there was a restraining order against him, yet he was told that he should go to the clerk's office to file the complaint but not to have any communication with Ms. Cabibbo.

10. In accordance with the instructions from the Central Municipal Court, the plaintiff appeared at the window set up for the public at the Fair Lawn Municipal Court. The plaintiff advised a woman behind the window that he desired to file a complaint against Ms. Cabibbo.

11. At or about this same time, defendant Sgt. A. Ferreira, (herein after referred to as "Ferreira") appeared along side of the plaintiff. At this time the plaintiff was taken into custody and brought down stairs in the police station to plaintiff's complete dismay and surprise.

12. At this time Mr. Cabibbo was placed under arrest, processed, and held in custody for many hours based upon the allegation that he had violated a final restraining order by appearing at Ms. Cabibbo's place of employment.

13. This occurred despite the plaintiff's protestations to defendant's Ferreira and also defendant Sgt. Leitman (herein after referred to as "Leitman") to call the Central Municipal Court to clear the matter up.

14. With the passage of many hours in which the plaintiff remained in custody and deprived of his freedom, phone calls were then made to the Bergen County Prosecutor's Office at which time the defendants Ferreira and Leitman were advised that there was no basis for this complaint and also a Bergen County Superior Court advised of the same.

15. Ultimately, the defendant arresting officers apologized to Mr. Cabibbo and he was released.

16. Despite the above occurring, defendant Patterson on June 13th took actions which resulted in the re-filing of a criminal complaint against the plaintiff despite the fact that there had already been a previous determination by the Bergen County Prosecutor's office there was no existing probable cause for the issuing of this complaint.

17. Thereafter, on June 28, 2015 the defendant Ms. Cabibbo, improperly using the authority of her position as Court Administrator, caused an additional criminal complaint to be filed against the plaintiff on June 28, 2015. These complaints included allegations of disorderly persons offenses, and third and fourth degree crimes.

18. Defendant Patterson along with John Doe 1 and John Doe 2 and other defendants including Ms. Cabibbo, were responsible in misstating, misrepresenting and distorting the facts that had occurred on the previous day, all resulting in a reissuance of a new complaint making the same allegations against the plaintiff.

19. During all relevant time frames, and specifically during the transactions referred to above, defendant Patterson maintained a personal relationship with defendant Ms. Cabibbo. It is

because of this personal relationship, and in conspiracy with her, that the normal procedures, mechanisms, and protocols were not followed by the defendant Fair Lawn Police Department, all resulting in false charges, and a false arrest being effectuated against the plaintiff. These include but are not limited to the following: Allowing Ms. Cabibbo on her own initiative to obtain official documents such as summons, complaints that she had access to as Court Administrator, and to prepare those documents under her official capacity to pursue her own personal agenda., to wit, to cause the false arrest of the plaintiff. Further, defendant Ms. Cabibbo along with defendant Patterson, along with defendants John Doe 1 and John Doe 2, prior to the date of June 12, 2015, in an effort to prevent a complaint from being filed against defendant Ms. Cabibbo, committed official misconduct in not following proper protocol, procedures, and methodology as would be followed in normal circumstances. This all occurred by and through the preferential treatment given to defendant Ms. Cabibbo, by defendant Patterson. At all such times, defendant Patterson and John Doe 1 and John Doe 2 were acting as agents, servants, and/or employees of the Borough of Fair Lawn and the Borough of Fair Lawn Police Department and acting within the scope of their authority.

20. Further, during all relevant time frames the Borough of Fair Lawn Police Department had failed to implement appropriate procedures, policies, and training, to assure that blatant conflicts of interest would be avoided by police officers when their department is investigating crimes or wrong doings alleged by co-employees within the department, of whom the investigation officer have a personal relationship with.

21. All the foregoing, resulted in the infringements and violation of plaintiffs constitutional rights both under the State and Federal Constitution set forth below.

FIRST COUNT

1. The plaintiff repeats and realleges the allegations set forth in the factual background section of this complaint as if set forth at length herein.
2. Defendants Borough of Fair Lawn, Borough of Fair Lawn Police Department, Ms. Cabibbo, Patterson, Leitman, and John Doe 1 and John Doe 2, acting as agents, servants, and/or employees of defendants Borough of Fair Lawn and Borough of Fair Lawn Police Department during all relevant time frames knew that plaintiff had not committed any crimes or disorderly person's offenses. Despite having such knowledge, they proceeded to act in concert with each other in order to effectuate the false arrest of the plaintiff, to file false criminal and /or disorderly charges against the plaintiff, and to restrain his freedom, and deprive him of his liberty without just cause. When they did so, they acted with malice, knowing that there was no reasonable basis, to effectuate the above actions.
3. As a consequence of this arrest, the plaintiff was caused to undergo great suffering, was caused to lose his liberty, was caused to suffer great indignity, and has suffered emotionally, and was caused to suffer a diminution in his reputation. All these actions come in violation of the United States Constitution, the New Jersey State Constitution, and various state laws.

WHEREFORE, plaintiff Joseph Cabibbo demands judgment against defendants for compensatory damages, consequential damages, punitive damages, attorney's fees, interest, cost of suit and any other relief the Court deems just and appropriate.

SECOND COUNT

1. The plaintiff repeats and reasserts the allegations of the Factual Section of this Complaint and the First Count of this Complaint as if set forth at length herein.

2. The defendants Cabibbo, Patterson, and John Doe 1 and John Doe 2, acting as agents, servants, and/or employees of the Borough of Fair Lawn and Borough of Fair Lawn Police Department, engaged in conduct with the purpose to impede and impair the plaintiff's ability to resort to legal processes available to all citizens of the United States and of the State of New Jersey to wit, the ability to where appropriate file reports and criminal complaints against those who deemed to have violated the laws of the State of New Jersey. In particular, the plaintiff had every right in April, 2015 to file a criminal complaint and/or disorderly persons offense against defendant Clare Cabibbo. However, defendants Patterson, Ms. Cabibbo, and John Doe 1 and John Doe 2, individually and in conspiracy and concert with each other, created the false impression in the plaintiff's mind that they were properly processing a complaint filed by him when they were taking actions to do just the opposite. Further, during all such time frames they were seeking to conceal from the plaintiff the true status of the complaint which he was seeking to file.

3. These actions by public officials, who were sworn to duty to properly investigate allegations, violated the plaintiff's substantive due process and procedural due process rights in violation of his rights under the United States Constitution and the New Jersey State Constitution, and in violation of other state laws.

4. As a proximate result of defendant's unconstitutional conduct, the plaintiff was caused to suffer severe emotional distress and anguish, amongst being deprived of procedural rights afforded under the United States Constitution and New Jersey Constitution.

WHEREFORE, the plaintiff demands judgment against defendants for compensatory damages, consequential damages, punitive damages, attorney's fees, interest, cost of suit, and any other relief the court deems just and appropriate.

THIRD COUNT

1. The plaintiff repeats and realleges the allegations of the Factual Background section of the complaint and the First Count and Second Count as if set forth at length herein.
2. The wrongful actions of the defendants, Ms. Cabibbo, Patterson, Leitman, John Doe 1 and John Doe 2, all acting as agents, servants, and/or employees of the defendant, Borough of Fair Lawn and Borough of Fair Lawn Police Department, resulted in the intentional confinement of plaintiff within the Fair Lawn Police Department without legal justification. These actions by the defendant constitutes false imprisonment of the plaintiff.

WHEREFORE, plaintiff demands judgment against defendants for compensatory damages, consequential damages, punitive damages, attorney's fees, cost of suit and any other relief the court deems just and appropriate.

FOURTH COUNT

1. The plaintiff repeats and reasserts the allegations contained in the Factual Background section of the complaint, the First, Second, and Third Count as if set forth at length herein.
2. The actions by the defendants as set forth in the factual background section of this complaint, in particular the arrest of the defendant without warrant and without probable cause, constituted a violation of 42 U.S.C. 1983 and similar laws within the State of New Jersey in violation of the United States Constitution and the New Jersey State Constitution.

WHEREFORE, plaintiff demands judgment against the defendants for compensatory damages, consequential damages, punitive damages, attorney's fees, cost of suit, and any other relief the court deems just and appropriate.

FIFTH COUNT

1. The plaintiff repeats and reasserts the allegations contained in the Factual Background section of the complaint, the First, Second, Third and Fourth Count as if set forth at length herein.
2. The actions of all defendants as set forth in the factual background section of the complaint, are reflective of a conspiratorial arrangement between the defendants. In particular, defendant Patterson because of a personal relationship with defendant Ms. Cabibbo, entered into a tacit agreement with her to do the following: 1.) to create the false impression in Mr. Cabibbo's mind that a criminal complaint made by him against Ms. Cabibbo in April, 2015 was properly investigated and filed when in fact such had not occurred; and 2.) caused the plaintiff to be arrested and be confined without justification, and without probable cause on June 12, 2015 all in furtherance of this conspiracy between defendant Patterson and defendant Cabibbo to cause harm to the plaintiff; 3.) after learning that there was no probable cause for that arrest, nonetheless engaged in a further conspiracy to effectuate the refiling of the same criminal complaint against him days later that initially resulted in his false imprisonment knowing that there was no basis to do such; and 4.) conspiring and failing to disclose properly to various judges the underlying facts and circumstances, thereby depriving various judges from having sufficient information before them to make appropriate probable cause determinations.
3. The actions by the defendants Patterson and Ms. Cabibbo, along with John Doe 1 and John Doe 2 constitute a conspiracy in violation of 42 U.S.C. 1983 and 42 U.S.C. 1985.

WHEREFORE, plaintiff demands judgment against the defendants Ms. Cabibbo, Patterson, John Doe 1 and John Doe 2 for compensatory damages, consequential damages,

punitive damages, attorney's fees, cost of suit, and any other relief the court deems just and appropriate.

SIXTH COUNT

1. The plaintiff repeats and reasserts the allegations contained in the Factual Background section of the complaint, the First, Second, Third, Fourth and Fifth Count of the complaint as if set forth at length herein.
2. Prior to June 12, 2015 it was a policy and/or custom of the Borough of Fair Lawn and the Borough of Fair Lawn Police Department to inadequately and improperly investigate citizen's complaints against employees of the Borough of Fair Lawn and the Borough of Fair Lawn Police Department, and the acts of such conduct were instead tolerated by the Borough of Fair Lawn and the Borough of Fair Lawn Police Department.
3. It is further policy and/or custom of the Borough of Fair Lawn and the Borough of Fair Lawn Police Department to inadequately supervise and train its police officers, including the defendant police officers, on how to handle a conflict of interest situation whereby a criminal complaint is made to a police officer regarding another individual of whom that officer has a personal relationship with.
4. It is also the policy and/or custom of the Borough of Fair Lawn and the Borough of Fair Lawn Police Department to not properly investigate an alleged crime to determine if there exists probable cause to effectuate a seizure of a person, and in what circumstances such would be justified.

5. As a result of the above policies and customs, or lack thereof, the defendants herein were led to believe their improper actions would not be investigated or sanctioned, yet in fact would be tolerated.

6. The above described policies and/or customs or lack thereof by the Borough of Fair Lawn and the Borough of Fair Lawn Police Department demonstrate a deliberate indifference on the part of the policy makers of the Borough of Fair Lawn and the constitutional rights of a person within the Borough of Fair Lawn were the cause of the violations of the plaintiffs rights alleged herein.

WHEREFORE, the plaintiff demands judgment against the Borough of Fair Lawn, Borough of Fair Lawn Police Department for compensatory damages, consequential damages, punitive damages, attorney's fees, cost of suit, and any other relief the court deems just and appropriate.

SEVENTH COUNT

1. The plaintiff repeats and realleges the allegations contained in the Factual Background section of the complaint, the First, Second, Third, Fourth, Fifth and Sixth Count of the complaint as if set forth at length herein.

2. Defendants Patterson, Cabibbo and Leitman acting as agents, servants, and/or employees of defendant Borough of Fair Lawn and Borough of Fair Lawn Police Department during all relevant time frames knew that the plaintiff had not committed any crimes or other wrong doings against Ms. Cabibbo. Despite having such knowledge, they proceeded in concert to levy false criminal charges against the plaintiff, to wit criminal complaints signed by defendant Ferreira on June 13, 2015, and the filing of criminal complaint by Ms. Cabibbo on June 28, 2015. When this

action was undertaken by defendant Ferreira it was done in concert and/or on behalf of defendant Ms. Cabibbo. Further, when this action was taken it was done with malice, knowing that there was no reasonable cause to prosecute the plaintiff, and by doing such the defendants Ferreira, Cabibbo and John Doe 1 and John Doe 2 engaged in a malicious prosecution of the plaintiff. This prosecution was favorably terminated as to the plaintiff, in that the charges were ultimately dismissed.

3. As a consequence of the malicious prosecution, the plaintiff was caused to undergo great suffering, was caused to lose his liberty, was caused to defend himself in a court of law, and was caused to spend various sums of money to do so, and suffered greatly emotionally, physically, and was caused to suffer a diminution in his reputation.

WHEREFORE, the plaintiff demands judgment against defendants for compensatory damages, consequential damages, punitive damages, attorney's fees, interest, cost of suit, and any other relief the court deems just and appropriate.

EIGHTH COUNT

1. The plaintiff repeats and realleges the allegations contained in the Factual Background section of the complaint, the First, Second, Third, Fourth, Fifth, Sixth and Seventh Count of the complaint as if set forth at length herein.

2. The actions and/or inactions committed by the defendants Patterson, Ferreira, Leitman, John Doe 1, and John Doe 2, acting as agents, servants, and/or employees of the Borough of Fair Lawn, and Borough of Fair Lawn Police Department, were done in an extreme and outrageous manner directed specifically at the plaintiff.

3. These actions were done in a fashion that were intended to produce emotional distress, or recklessly in deliberate disregard of a high degree of probability that emotional distress would follow.

4. Accordingly, the defendants referenced above are liable in damages to the plaintiff for the misconduct proximately caused by them, in that the emotional distress suffered by the plaintiff and directed at him was so severe that no reasonable person could be expected to endure the same.

WHEREFORE, the plaintiff demands judgment against the defendants for compensatory damages, consequential damages, punitive damages, attorney's fees, interest, cost of suit, and any other relief the court deems just and appropriate.

JURY DEMAND

Plaintiff(s) hereby demands trial by a jury of six (6) persons as to all issues.

FAUGNO & ASSOCIATES, L.L.C.
Attorneys for Plaintiff
Joseph Cabibbo

July 25, 2016

By: s/ Paul Faugno, Esq.
Paul Faugno, Esq.

JS 44 (Rev. 07/16)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Joseph Cabbbo

DEFENDANTS

Borough of Fair Lawn, Borough of Fair Lawn Police Department, Clare Cabbbo, Captain Patterson, Sgt. A. Ferreira, Sgt. Lellman, John Doe 1, et als

(b) County of Residence of First Listed Plaintiff Passaic County
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, Email and Telephone Number)

Faugno & Associates, LLC, 120 State St., Hackensack, NJ 07601
paul@faugnowlawfirm.com; legal@faugnowlawfirm.com; 201-342-1969

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | |
|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
| PTF | DEF | | PTF | DEF |
| ☒ 1 | ☐ 1 | Incorporated or Principal Place of Business in This State | ☐ 4 | ☐ 4 |
| ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business in Another State | ☐ 5 | ☐ 5 |
| ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT ☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☒ 362 Personal Injury - Medical Malpractice	PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	FORFEITURE/PENALTY ☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other	BANKRUPTCY ☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 840 Trademark	OTHER STATUTES ☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☒ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education	PRISONER PETITIONS ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 560 Civil Detainee - Conditions of Confinement	LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act	SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g))	FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendants) ☐ 871 IRS—Third Party 26 USC 7609
			IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes	

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. 1983 and 42 U.S.C. 1965Brief description of cause:
False arrest**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$
750,000.00CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE
07/25/2016SIGNATURE OF ATTORNEY OF RECORD
s/ Paul Faugno**FOR OFFICE USE ONLY**

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____