

UNITED STATES DISTRICT COURT

for the

District of New Jersey



LOUIS DESSOURCES

Plaintiff

v.
RAYMOND HAMM

Defendant

Civil Action No. 2:18-cv-09324-SD-LDW

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* CLERK, TOWNSHIP OF ORANGE
29 NORTH DAY STREET # 203,
ORANGE, NEW JERSEY 07050

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

ELDRIDGE HAWKINS, ESQ.
60 EVERGREEN PLACE SUITE 510
EAST ORANGE, NEW JERSEY 07018

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: 01/30/2020

CLERK OF COURT

[Handwritten Signature]
Signature of Clerk or Deputy Clerk

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2020 FEB 10 AM 10:54

UNITED STATES DISTRICT COURT

for the

District of New Jersey



LOUIS DESSOURCES

Plaintiff

v.
SGT BANKS

Defendant

Civil Action No. 2:18-cv-09324-SD-LDW

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) CLERK, TOWNSHIP OF ORANGE
29 NORTH DAY STREET # 203,
ORANGE, NEW JERSEY 07050

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A lawsuit has been filed against you.

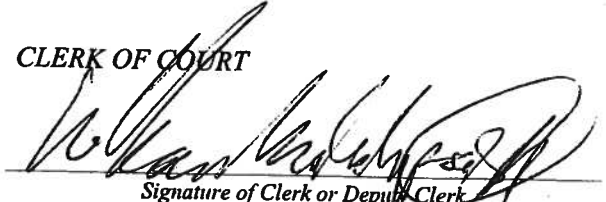
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EAST ORANGE, NEW JERSEY 07018

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CLERK OF COURT


Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT

for the

District of New Jersey



LOUIS DESSOURCES

Plaintiff

v.

POLICE OFFICER ADRIENZEN

Defendant

Civil Action No. 2:18-cv-09324-SD-LDW

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) CLERK, TOWNSHIP OF ORANGE
29 NORTH DAY STREET # 203,
ORANGE, NEW JERSEY 07050

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ELDRIDGE HAWKINS, ESQ.
60 EVERGREEN PLACE SUITE 510
EAST ORANGE, NEW JERSEY 07018

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Date: 01/30/2020

CLERK OF COURT

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT

for the

District of New Jersey



LOUIS DESSOURCES

Plaintiff

v.
OFFICER R. WILSON

Defendant

Civil Action No. 2:18-cv-09324-SD-LDW

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) CLERK, TOWNSHIP OF ORANGE
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60 EVERGREEN PLACE SUITE 510
EAST ORANGE, NEW JERSEY 07018

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CLERK OF COURT

Signature of Clerk or Deputy Clerk

Date: 01/30/2020

UNITED STATES DISTRICT COURT

for the

District of New Jersey



LOUIS DESSOURCES

Plaintiff

V.
QUENTAN BOYD

Defendant

Civil Action No. 2:18-cv-09324-SD-LDW

SUMMONS IN A CIVIL ACTION

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60 EVERGREEN PLACE SUITE 510
EAST ORANGE, NEW JERSEY 07018

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CLERK OF COURT

Date: 01/30/2020

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT

for the

District of New Jersey



LOUIS DESSOURCES

Plaintiff

v.
POLICE OFFICER MENDOZA

Defendant

Civil Action No. 2:18-cv-09324-SD-LDW

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* CLERK, TOWNSHIP OF ORANGE
29 NORTH DAY STREET # 203,
ORANGE, NEW JERSEY 07050

A lawsuit has been filed against you.

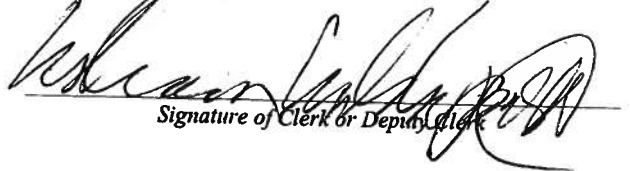
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ELDRIDGE HAWKINS, ESQ.
60 EVERGREEN PLACE SUITE 510
EAST ORANGE, NEW JERSEY 07018

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Date: 01/30/2020

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UNITED STATES DISTRICT COURT

for the

District of New Jersey



LOUIS DESSOURCES

Plaintiff

v.

POLICE OFFICER SIMMONDS

Defendant

Civil Action No. 2:18-cv-09324-SD-LDW

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* CLERK, TOWNSHIP OF ORANGE
29 NORTH DAY STREET # 203,
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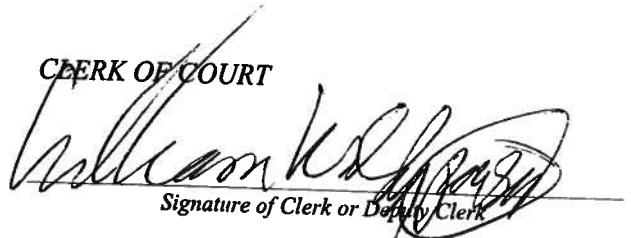
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Date: 01/30/2020

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CIVIL ACTION
DOCKET NO.: 2:18-cv-09324-SD-LDW
THIRD SUPPLEMENTAL COMPLAINT AND JURY DEMAND

LOUIS D. DESSOURCES Plaintiff v. DENNIS MANNING, SHAHID WEBB (JANE DOE 5, 6, 7 AND JOHN DOES 2, 3, 4, 5), CITY OF ORANGE TOWNSHIP, ORANGE POLICE OFFICERS WITH BADGE NUMBERS 214, 334, (SIMS) , 335, ODABRO LOUNGE 8 BAR, RODERIC J. MILLER, SGT. BANKS, OFFICER R. WILSON BADGE #290, QUENTAN BOYD, RAYMOND HAMM, ESSEX COUNTY PROSECUTORS' OFFICE, COUNTY OF ESSEX, POLICE OFFICERS SIMMONDS, MENDOZA AND ADRIENZEN, ESSEX COUNTY PROSECUTOR, DEPUTY CHIEF DETECTIVE RASOOL Defendants,	UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY <u>CIVIL ACTION</u> <u>THIRD SUPPLEMENTAL AMENDED COMPLAINT AND JURY DEMAND</u>
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Louis D. Dessources, a Haitian American resident of the
City of Orange Township, Essex County, New Jersey, by way of
Complaint says:

JURISDICTION

1. This suit arises under the United States Constitution and
the laws of United States Title VII and is brought pursuant

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to 42 USCA 1981, 1982, 1983, 1985, 1986, 1988; together with pendent state claims.

2. The Courts have jurisdiction over Plaintiff's Federal claims pursuant to 28 U.S.C. § 1331, as an action arising out of the Constitution of United States and 28 U.S.C. § 1343 (a) (3) to redress the deprivation under the color of state law, of rights, privileges and liberties secured by the Constitution of the United States' and over Plaintiff's pendent state law claims pursuant to 28 U.S.C. § 1367.
3. The Court has authority to grant declaratory and injunctive relief pursuant to the declaratory judgment act, 28 U.S.C. § 2001, et. seq.
4. The Court has authority to award costs and attorney's fees pursuant to 42 U.S.C. § 1988 and Title VII as well as ADA and N.J.S.A. 10:6-2 (2) and N.J.S.A. 10:5-13, 27.
5. Venue is properly laid in the District of New Jersey, pursuant to 28 U.S.C. 1391 (b), because Plaintiff resided in New Jersey, when and where all acts took place and all defendants do business in this district, all acts including wrongful arrest and prosecution occurred in New Jersey which, rise to this claim occurring in this District.
6. The damage amount in dispute exceeds \$350,000.

WHEREFORE, plaintiff requests judgment for monetary damages,

both past and future, both compensatory and punitive with costs, interest and attorney's fees.

PARTIES

1. The Township of Orange and its Police Department and court system is a place of public accommodation and is a corporate entity and municipal politically allowed entity to be dependent under N.J.S.A. 5-1 et seq., N.J.S.A. 10:6-2 (c), created under the laws of New Jersey and at all times operates through its agents employees.
2. Defendants, Roderic Miller, Quentin Boyd and Sgt. Raymond Hamm, their Supervisor, P. O. Sims Badge # 334, Police Officers names unknown, with badge #'s 214, 335 and Sgt. Banks at all times mentioned in this complaint were Police Officers employed by the Defendants' Township of Orange and were acting in their capacity as agents, employees of the Orange Police Department. The Defendant Raymond Hamm was the supervising Orange P.O. Officer who agreed with and allowed the complaints brought by his subordinate police.
3. All Defendants are all joined individually and officially, Defendant Dennis Manning and Shahid Webb whose 1st name has identity previously was unknown, were on May 15, 2017 in the employ of Defendant Odabro Bar

and Lounge and acting in the performance of their duties as security personnel for their employer. They are joined individually and officially as employee agents of Defendant, Odabro Bar.

4. Defendant County of Essex operated thru their employee agents Deputy Chief Detective Rasool, Assistant Prosecutor Donna Williams (John Doe and Head Doe, who made determinations to:

a. Proceed to Grand Jury with criminal allegations against Plaintiff, the real victim herein, and;

b. Not proceed against Defendant's Webb and Manning who were in unlawful possession of weapons (without permit) while they were employed as private security personnel for Defendant Odabro and who engaged in actions for which Plaintiff herein was charged as Defendant instead of Webb and Manning;

c. Further deprive Plaintiff of his weapons and permits to buy and carry and use as opposed to treatment given to Defendant's Webb an Manning (deprivation of equal protection)

5. Head Doe and John Doe (1-10) (present identities unknown) are parties' defendants who are agents and/or employees of defendant, Township of Orange or County of Essex.

6. All individual Defendant's known and unknown are joined officially and individually
7. Dwayne D Warren, Esq was at all times mentioned herein the Mayor and Chief executive officer with the duty to properly supervise the police department, its police director and to insure police employee-agents obey the law and do not violate citizens' rights. He has failed in that duty.
8. Todd Warren, at all times mentioned herein is the brother of Mayor Warren and Police Director responsible for the proper conduct, training and supervision of the police employee agents. He is failed in that duty.
9. Michael Hackett at all times mentioned herein was a municipal judge in the Township of Orange whose duty was to obey the statutes of the State of NJ and Rules of Court in addition to the NJ Constitution which direct and limit his authority. Michael Hackett violated his authority (ultra viruslly) by not following the rules of court which allow plaintiff to be arrested only for criminal actions or breaches of the peace.
10. Coley, Eason, Williams, Summers-Johnson, Johnson, Jackson, and Wooten are municipal city council members whose duty it is to keep oversight over the administrative and judicial arms of government and to

take steps to prevent unlawful deprivations of persons rights by seeing to it that personnel are properly trained and supervised. Said persons have failed this duty.

11. Orange police officers Mendoza, Simmonds, and Adrienzen as well as officer Miller are police officers who on September 8th 2019 falsely arrested, imprisoned, assaulted and charged plaintiff with untrue allegations and offenses which did not legally rise to the level allowing for the orange police department to arrest, process, and incarcerate plaintiff for the two days he was forced to remain incarcerated,

a) Said police officers had support of supervising police who joined in the retaliation and harassment of the unlawful arrest, incarceration and prosecution predicated upon no unlawful conduct or crime committed by plaintiff. Please see attached notice of claim dated September 11th 20119 and entry of appearance dated September 13th 2019 both of which are incorporated fully herein.

12. Essex County Prosecutors Deputy Chief Detective Rasool denied plaintiff his return of his lawful property/weapon which was required to be turned over to the county prosecutor's office in order for him to be release.

13. Plaintiff was not billed (not indicted) and entitled to the return of his weapon as there was no probable cause to indict him for any crime. The prosecutors office by authority of Defendant Rasool for no lawful reason refused to return to plaintiff his rightfully owned property.

STATEMENT OF FACTS

1. Plaintiff, Louis Dessources, was on May 15, 2017 a lawfully employed armed security guard with a permit to carry a weapon lawfully, issued to him by the Honorable Alfonse J. Ciffelli, Judge of New Jersey Superior Court in Essex County.
2. Prior to May 15, 2017, Plaintiff had an altercation with Defendants Manning and Webb at Defendants Odabro Lounge, Orange, New Jersey.
3. On a previous evening, about a month or 2 prior, when Plaintiff was entering the Odabro premises in regular clothes, Webb came out of his car which had red and blue lights on, asked Plaintiff to show him I.D. and attempted to pat Plaintiff down.
4. Plaintiff asked Webb, "Who was He? And he said, "He is a Sheriff's Officer." Plaintiff asked him for his credentials. Webb then said: "I am a retired Sheriff's Officer," Plaintiff asked to see his badge and he showed

Plaintiff a Constable badge with a star. Plaintiff told him he is not a Sheriff Officer and walked into the club.

5. Dennis Manning, (who knew Plaintiff), Defendant Webb's cousin, saw Plaintiff at the club shortly after the first encounter and said: "Yo man! Leave my cousin alone".

6. On May 15, 2017, After Plaintiff left his assignment location as a security guard, he drove by the Odabro Lounge to pick up his brother to give him a ride home.

a. Upon information and belief, Dennis Manning also had a problem in Orange pretending to be a cop.

7. On May 15, 2017, early A.M. Plaintiff entered Odabro Lounge. After Plaintiff had picked up his brother without incident and was leaving from inside the club, into the parking lot, Defendant Webb approached Plaintiff from the right side, looked at Plaintiff, rolled his head and said "this f...ing nigger. Plaintiff asked him what did he mean by, "f...ing nigger").

8. Webb said "you can get shot by wearing a uniform like this". (Black security uniform).

9. Plaintiff asked him "what do you mean, that I can get shot dressing like this"? Plaintiff told Webb "You gotta watch how you talk to people". Webb grabbed and twisted Plaintiff's hand and told the Plaintiff you are under arrest, you shouldn't have a gun. Plaintiff freed himself

from Webb and Plaintiff then walked off to the gate, to avoid an encounter.

10. Webb grabbed Plaintiff from the neck of his jacket, pulled him back, and slammed, punched, and pushed Plaintiff to the hood of a car parked next to the gate.
11. Webb was joined by Defendant Manning, both of whom were choking Plaintiff, making it difficult to breathe. Plaintiff then pushed them back and Webb punched Plaintiff in the mouth and head causing bloody injuries.
12. Webb then tried to pull out Plaintiff's weapon and could not do so because Plaintiff had a level 3 holster, requiring 2 safeties to be removed.
13. A witness seeing the event said: "Are you guys serious?"
"What are you doing?"
14. "At that point, Manning pulled his weapon and pointed it at Plaintiff.
15. Webb grabbed Plaintiff and pushed Plaintiff away. Webb then called the Police.
16. Plaintiff waited for the Police. Manning put his gun away before the Police came.
17. Defendant Webb said to someone on the phone, "someone tried to enter the Club with a weapon".
18. The Orange Police came, to the scene of the Club, Officers Miller & Boyd took Plaintiff's weapon and listened

to Webb and Manning and refused to listen to the Plaintiff. Plaintiff was pushed into the car and transported to headquarters. Plaintiff told the Officer's in the car going to headquarters that Plaintiff had left his security job and was on his way home and picked up his brother from the club.

19. EMS was called and EMS checked Plaintiff's bloodied lip. Plaintiff continued to request to give his statement but was disallowed to do so.

20. Plaintiff asked for the full name and address of Webb so Plaintiff could file a Complaint, and the Orange Police Department personnel would not give it to the Plaintiff.

21. Defendant's Webb and Manning never mentioned the previous run-ins with Plaintiff when explaining his reasons in support of the crimes he described to be brought against Plaintiff.

22. Defendant's Webb and Manning said the incident happened when Plaintiff entered the club. Same is definitely untrue and known to be untrue by Defendant's as the incident occurred after Plaintiff left the club.

23. Defendant's Webb and Manning attacked Plaintiff. Manning pulled his gun on Plaintiff and both assaulted and battered Plaintiff (the real victim).

24. The Defendant's Miller, Boyd, John Doe 2 and 3, John Doe 4 and 5, Jane Doe 5 -7, Head Doe (Does identities unknown) as agents of employer, the Essex County Prosecutor's Office and agents of the Orange Municipal Court and Sgt. Raymond Hamm, O.P.D. who approved all officers' actions, all agreed, aided and abetted each other to:

- a. Falsely arrest and charge Plaintiff.
- b. Deny Plaintiff the ability to file charges against Webb and Manning.
- c. Maliciously prosecute Plaintiff.
- d. Imprison, fingerprint and mug shot Plaintiff.
- e. Protect Manning and Webb from losing their weapons permit.
- f. Deprive Plaintiff of his weapons, purchase and carry permits.

25. Both Plaintiff and Plaintiff's counsel tried to obtain the ability to know the identities and addresses of his assailants and have or file charges with the Orange Municipal Court and with the Essex Prosecutor's Office.

26. Neither entity gave Plaintiff his equal right to file charges or have the police or prosecutor's office file charges on his behalf.

1. Plaintiff repeat's the allegations of all paragraphs herein as if fully restated herein.
2. As a consequence of all Defendant's actions done, negligently, purposely, wantonly, recklessly, intentionally, Plaintiff has been inflicted with severe emotional distress. His loosened teeth are constant reminders of the stressful incident which repeat in his mind.
3. Said emotional distress has caused him to have a hypertensive state which constantly gives him trepidation of the consequences of his blood pressure rising under any circumstances.
4. Plaintiff has been damaged and harmed

WHEREFORE, plaintiff requests judgment for monetary damages, both past and future, both compensatory and punitive with costs, both jointly and separately interest and attorney's fees.

COUNT TEN

DEFENDANT'S WEBB, MANNING, CITY OF ORANGE, SGT BANKS, PO SIMMS CLASS OF ONE EQUAL PROTECTION BADGE #335, 334, 214

1. Plaintiff repeats all previous paragraphs as if specifically restated herein and specifically those regarding the May 22, 2018 Walgreens incident.
2. Defendant's Webb, Manning in concert with the Orange Police Sgt. Banks, Police Officer Simms, Badge # 335,

and John Does 9, 10, 11 identified with Badges # 214, 334, 335 aided and abetted each other to wrongfully harass, detain, physically arrest and handcuff Plaintiff and caused such a set of circumstances that the Police told him the Store Manager no longer wanted him in said store.

3. This is the store, convenient to Plaintiff where he obtains the medication for his family.
4. Defendants actions, individually, jointly and in an aiding and abetting fashion is continued personal harassment to deprive Plaintiff of the equal privileges and benefits of the Orange Police department as accorded to Defendants Webb and Manning.
5. It has become the custom of Defendants, City of Orange Police and employee-agents to do the will of Defendants. Webb and Manning, including unlawful detention and arrest of Plaintiff without probable cause.
6. The actions of May 22, 2018 were requested to be investigated by August 20, 2018 certified letter-Notice of Claim to the Clerk of Orange, copies were sent to Sgt. Banks and Officer Simms.
7. Plaintiff's counsel got no response to the request for investigation or inquiry for more information .

8. Neither was the usual formal form submitted to the undersigned for his client to fill out.
9. Said differential treatment accorded Plaintiff by Defendant Orange Police agents as opposed to Defendants Webb and Manning amounts to deprivation of the equal protection of the law under the U.S. Constitution Amendment V and XIV and New Jersey's Constitution, Article 1 Paragraph
10. As a consequence of Defendants' actions by agreement and individually, Plaintiff was deprived of the equal treatment of not having the Orange Police abuse their authority against Plaintiff just because Webb or Defendant Manning asks.
11. Defendant's Webb and Manning falsely stated without just cause or probable cause that Plaintiff was armed and caused Plaintiff to be patted down, detained and handcuffed which interrupted his freedom of movement.
12. This was at least the 2nd time the Orange Police wrongfully arrested Plaintiff at the behest of Officer(Defendant) Manning and Officer(Defendant) Webb to deprive Plaintiff of his freedom under false pretenses.
13. The Defendants Orange Police and Court personnel should have been aware that there was an ongoing

altercation between Manning and Webb that resulted in no indictment was returned against Plaintiff and Orange Defendants did not allow Plaintiff to file charges against the protected Webb and Manning.

14. Defendant Orange Police Management did not properly advise their subordinates of the personal dispute between Webb, Manning and Dessources. So that they would not simply believe everything Defendants Webb and Manning say and be guided by same.

15. As a consequence of Defendants actions individually, jointly and severely Plaintiff has been damaged, harmed and deprived of his equal protection, substantial due process rights and freedom.

WHEREFORE, Plaintiff requests this Court enters judgment for compensatory damages, both past and future, punitive damages, costs, interest and attorney's fees.

COUNT ELEVEN
VIOLATION OF 42 USCA 1981, 1983, 1985, 1986, 1988 AS TO
DEFENDANTS MANNING, WEBB, ORANGE, SGT. BANKS, OFFICIER SIMS,
BADGE #334, #214, # 334

1. Plaintiff repeats all of the aforementioned paragraphs as of fully restated herein.
2. Defendants' actions were done under color of State Law.
3. Defendants each and all were engaging in what has become the custom of Orange Police Department to deprive Plaintiff of his equal protection rights, freedom, substantive due

process all at the request of Defendant's Webb and Manning's all of whom aide and abet each other to deprive Plaintiff of his constitutional rights by abusing their state given authority a police.

4. Each Police Officer instead of assisting the continued abuse of Plaintiff's Civil Rights were duty bound to stop and prevent them. Instead each and all Defendants aided and abetted each other in violating Plaintiff's rights.

5. As a consequence, Plaintiff was harmed and damaged.

WHEREFORE, Plaintiff requests this Court enter judgment for compensatory damages, both past and future, punitive damages, costs, interest and attorney's fees.

COUNT TWELVE

VIOLATION OF N.J.S.A. 10:6-2 (c) AND N.J.S.A. 10:1-2; 10:5-4; 10:5-12 (f) ORANGE, SIMS, BANKS

1. Defendant's Orange Court and their Police Defendants are all places of public accommodation which are duty bound to treat all persons equally and not disparately.

2. Defendants violated Plaintiffs said rights under color of State Law in a disparate fashion causing Plaintiff harm, extreme emotional distress and discomfort.

WHEREFORE, Plaintiff requests this Court enters judgment for compensatory damages, both past and future, punitive damages, costs, interest and attorney's fees.

COUNT THIRTEEN

N.J.S.A 10:11-12; 10:5-12 (f)
PLACE OF ACCOMODATION NJ LAD DEFENDANTS CITY OF ORANGE TOWNSHIP,
DEFENDANT WEBB,
DEFENDANT ORANGE POLICE OFFICERS JOHN DOES, HEAD DOES

1. Plaintiff repeats the allegations of all previous paragraphs as if fully repeated herein.
2. On June 17, 2018 OPD Officers with Badge #'s 334 and 335 trespassed into Plaintiff's property by without authority, opening his closed gate and trespassing into the backyard where Plaintiff, his family and friends were enjoying the Father's Day Holiday.
3. Plaintiff asked them to leave and they refused to do so.
4. Plaintiff Dessources felt intimidated because of the ongoing conflict and the Police Officers had their hands on their weapons.
5. Plaintiff yelled leave his premises and turned to walk away and was by Officer Badge #335 grabbed him by his right shoulder and pulled him back.
6. Said unwanted and unjustified touching was an assault and battery.
7. Plaintiff attempted to report these events to the Orange Police Department and Court to obtain complaints against the Police responsible which was never allowed for any of Plaintiff's unhappy interactions with the Police.

8. Defendants' actions violated his privacy rights under N.J. Constitution, Article I, Par 1, Par 5, 6, 7, 18, 19, 22, and consequently also N.J.S.A. 10:6-2 (c); N.J.S.A. 10:1-2; N.J.S.A. 10:1-2; 10:5-4; 10:5-12 (f), 42 USCA 1981, 1983, 1985, 1986, 1988.
9. As a consequence, of Defendants overall plan to retaliate against Plaintiff for objecting and complaining and attempting to file Complaints against Webb, Manning, and the OPD, Defendants conspirators who brought complaints against Plaintiff but disallowed complaint or against Webb, Manning, and their OPD aiders and abettors, Plaintiff was harmed and damaged.

COUNT FOURTEEN
42 USCA 1981, 1983, 1985, 1986, 1988: WRONGFUL ARREST, WRONGFUL IMPRISONMENT; MALICIOUS PROSECUTION; VIOLATIONS OF NJ CONSTITUTION ARTICLE I PARAGRAPHS 1, 5, 8, 18, 22; VIOLATIONS OF NJSA 10:1-2; 10:5-12 (F); NJSA 10:6-2 (C); AND INTENTIONAL INFLECTION OF SEVERE EMOTIONAL DISTRESS; AND ASSAULT AND BATTERY.

[ONLY DEFENDANT TOWNSHIP OF ORANGE AND THEIR EMPLOYEE AGENT DEFENDANTS.]

1. Plaintiff repeated the allegations of all aforementioned paragraphs as if fully stated herein. Plaintiff also incorporates these paragraphs into all aforementioned counts.
2. Plaintiff refers to and incorporates the contents of the attached September 10-13, letters as if fully restated herein.
3. On September 8, 2019, Defendants Miller, Simmonds, Mendoza, and Addrienzen physically assaulted and battered Plaintiff as demonstrated in the September letters attached.

4. The actions as stated in the attached September 2019 letters amounted to violations by Defendants Orange and their agents-employees of Plaintiff's rights under 42 USCA 1981, 1983, 1985, 1986, 1988: NJ Constitutional rights under Article I, Paragraph 1, 5, 7, 8, 18, 22 NJSA 10:1-2; 10:5-4; 10:5-12 in that Defendants individually and by agreement and in an aiding and abetted manner conspired to individually and by agreement and in an aiding and abetted manner conspired to deprive Plaintiff of his rights to further retaliate against him for having previously having sued the city of Orange and the Orange agents. Plaintiff had a right to grieve and complain without Orange violating his rights guaranteed to him a victim of a crime under Article I, Paragraph 22 just because he is a Haitian (foreigner) who grieved and complained previously about the invidious actions of defendants. It was not allowed by Defendants to file Complaint in Municipal Court against his accusers
5. The actions as stated in the attached referenced letters violated Plaintiff's rights NJSA 10:6-2 (c): 10:1-2; 10:5-4; 10:5-12 (d) (f) in that said actions were done under color of police and municipal authority to deprive Plaintiff, of his civil rights because he is a black Haitian who filed a discrimination complaint against Orange and its agents.
6. Dwayne Warren, Todd Warren, and City Council Members in each of their capacity, negligently, recklessly, purposely, knowingly, and

intentionally in violation of their oaths of office to obey, follow, and enforce, the constitution of this State of New Jersey allowed or authorized the subordinate Police and Municipal Court of Office to engage in their continued civil rights depravations to find out thee full name and address if same against Plaintiff despite having been put on Notice of the previous actions of these agents of same.

7. The State legislative authorizations for Orange government's creation and operation mandates that the personnel officials obey the laws and the constitution of the State of New Jersey. Dwayne Warren , Todd Warren, and City Council members have failed to do so and have in fact appeared to have countenanced the wrong doings of their subordinates by failing to penalize train or correct these Police and the Police department's behaviors which appears to be the custom of the city as demonstrated by their failures to correct behaviors of Defendants in multiple other cases such as Yanley v. City of Orange; Debra Upchurch v. City of East Orange.
8. These customs and practices engaged in and allowed by the highest of officials of Defendant Orange, make Orange liable for the omissions and actions of their subordinates.
9. Notices of claims have been putting Orange Defendants on Notice of these matters and other matters pertaining to the lack of training of Orange Police Department personnel and the failure to properly supervise them.

10. Defendants' actions continue to place Plaintiff in a false light and continue to libel, slander, defame his name by giving him unconstitutionally a false criminal record. Same allows for Plaintiff to have per se damages against all of the Orange Municipal defendants. Defendant's actions continue as they continued to prosecute Plaintiff.
11. As a consequence of all of Defendant's action stated herein and above. Plaintiff has been damaged and harmed, suffered severe emotional distress and per se damages to his reputation.
12. Wherefore Plaintiff requests judgment for monetary damages both compensatory and punitive both past and future with costs interests and attorney's fees in addition to punitive damages.

REQUEST FOR JURY TRIAL

Plaintiff requests a jury trial pursuant to Article 1, Paragraphs 9 of the New Jersey Constitution and Amendment VII of the United States Constitution.

DATED: January 10, 2020

/s/Eldridge Hawkins
Eldridge Hawkins, Esq.

DESIGNATION TO TRIALS COUNSEL

Pursuant to R4:25, Eldridge Hawkins, Esq., is hereby designated as trial counsel for the above matter.

DATED: January 10, 2020

/s/Eldridge Hawkins
Eldridge Hawkins, Esq.

CERTIFICATION PURSUANT TO R.4:5-1

I hereby certify that the matter in controversy within this action is not the subject of any other action pending in any Court or any pending arbitration proceeding is contemplated. I further certify that there is no other party who would be joined in this action.

DATED: January 10, 2020

/s/Eldridge Hawkins
Eldridge Hawkins, Esq.