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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12

13 Mandingo Hayes

14 Plaintiff,

15 vs.

16 Dedrick Riley
17 City of Richmond, California
18 Does 1-50.

19 Defendants.
20 _____/

JURY TRIAL REQUESTED

No. 20-4283

COMPLAINT FOR DAMAGES

21
22 **INTRODUCTION**
23

24 1. This case arises out of the physical assault by Officer Riley on Mr. Hayes.

25 2. On December 5, 2019 Mr. Hayes observed Officer Dedrick Riley about to tow Mr.
26 Hayes' car. The registration was expired but but the car was parked directly in front of Mr.

1 Hayes' house. Mr. Hayes asked that the car not be towed.

2 3. Mr. Hayes recorded the discussion about the car with Officer Riley on his cell phone.

3 4. Officer Riley advanced toward Mr. Hayes and swatted at the phone which was
4 recording the interaction. He then grabbed Mr. Hayes. Mr. Hayes repeatedly stated do not touch
5 me and stepped back but Officer Riley advanced. In anger, he knocked the phone out of Mr.
6 Hayes' hands and assaulted Mr. Hayes.

7 5. Officer Riley's body worn camera failed to operate and the cell phone was no longer
8 operational.

9 6. Mr. Hayes defended himself and was able to escape and run toward his 10 year old son
10 who was watching Riley's assault on his father.

11 7. Officer Riley pulled his baton and battered Mr. Hayes from behind as Mr. Hayes
12 rushed his son into the house and locked the door.

13 8. As Officer Riley raged outside the door, he radioed for backup and other officers
14 arrived. The attacker, Dedrick Riley then ordered the arrest of Mr. Hayes.

15 9. No criminal charges were ever filed against Mr. Hayes and an Internal Affairs
16 investigation found that Riley had violated policy by failing to have his body worn camera
17 activated. This failure demonstrates the fact that Riley intended to act unlawfully and his
18 swatting away of Mr. Hayes' cell phone was consistent with his failure to allow his body worn
19 camera to record.

20
21 **STATEMENT OF FACTS**

22 10. On December 5, 2018 Mandingo Hayes was standing outside of his residence in
23 Richmond, California.

24 11. He had just met his 10 year old son, Treshawn Hayes at the nearby school bus stop
25 and had walked him home. Treshawn was standing on the driveway of their residence when
26 Officer Dedrick Riley arrived.

1 12. Officer Riley was standing at the side of Mr. Hayes' car, preparing to have it towed.
2 The car's registration had expired and a vehicle can be towed, provided its registration tags have
3 been expired for more than six months, according to section 22651 (o) (1) (A) of the Vehicle
4 Code.

5 13. Vehicle Code § 22650 states that it is a Fourth Amendment and Article I, section 13
6 (State Constitution) seizure to tow a vehicle. Under Vehicle Code § 22651, among the grounds
7 for towing a vehicle is the fact that registration has expired more than six months earlier and the
8 vehicle is found on a public street.

9 14. Vehicle Code § 22650 consistent with the Fourth Amendment and Article I, section
10 13 of the California Constitution, states that towing and seizing a vehicle under section 22651 is
11 not automatic when one of the listed grounds for towing such as an expired registration, exist.

12 15. Even when a basis for towing exists under Section 22651, towing is "only reasonable
13 if the removal is necessary to achieve the community care taking need, such as ensuring the safe
14 flow of traffic or protecting property from theft or vandalism."

15 16. Mr. Hayes was present at the location.

16 17. It was reasonable for Mr. Hayes to approach the car and ask that it not be towed.

17 18. The car was parked in front of Mr. Hayes' home and right next to the driveway to his
18 home and garage.

19 19. The driveway was empty and under five feet away from the car.

20 20. The car was operational and could have been moved to the private garage driveway in
21 less than 10 seconds of operation.

22 21. The officer involved and defendant in this lawsuit, Dedrick Riley was a criminal and
23 the Richmond Police Department knew that he was a criminal. This allegation uses the legal
24 term of criminal meaning he was known to have deliberately violated the California Penal Code
25 and yet he was retained as an officer.

26 22. On March 7, 2009, as an officer, Dedrick Riley beat citizen Ronald Stewart. Riley

1 was charged with felony assault. Mr. Stewart was a drug suspect. When he was handcuffed
2 Officer Riley punched him and failed report it.

3 23. The Richmond Police department supported Riley and it was only because the Contra
4 Costa County District Attorney's office conducted its own investigation that charges were filed.
5 A jury acquitted him and Richmond kept him on the force.

6 24. Riley had been fired from the police force for a similar incident in 2006.

7 25. That incident took place on March 26, 2006 at Serrano's Bakery on 23rd Street in
8 Richmond.

9 26. The owner's daughter, Veronica Serrano, had gotten to work early that morning and
10 found a local homeless man, Deganjara "Dave" Evans sitting at the counter inside the bakery.

11 27. Mr. Evans appeared to be sleeping. When Serrano woke him and told him he couldn't
12 sleep there, Evans allegedly responded negatively and the two began arguing. As the argument
13 escalated, the two began shouting at each other.

14 28. Ms. Serrano called police, and Officer Dedrick Riley and Officer Robert Garcia, a
15 new officer, responded and observed the two people arguing.

16 29. The officers separated the two and were escorting Evans away when he allegedly
17 spun around suddenly to face Serrano, according to court records. Serrano said later that the
18 officers ordered Evans to get down on the ground, but he resisted and then Riley struck him three
19 times on the leg with a baton.

20 30. Officer Riley was investigated by internal affairs which sustained his use of force but
21 found that he lied when he denied using the force.

22 31. Officer Riley was terminated but later reinstated with back pay.

23 32. In April of 2013, in Fairfield, California, Officer Riley punched a neighbor in the
24 face, put his hand on his semi-auto handgun and drew it from its holster. He brandished his
25 badge toward his neighbor.

26 33. Riley was angry that the neighbor was parked in front of Riley's house.

1 34. When police arrived, Riley denied punching his neighbor but police arrived and saw
2 the injuries to Mr. Gregory's face. They handcuffed Riley but released him at the request of the
3 neighbor.

4 35. Riley then sought a restraining order against his neighbor which the judge denied.
5 The judge strongly criticized Riley's behavior and questioned his mental faculties.

6 36. Riley remained a police officer despite his history of actual criminal conduct as set
7 forth herein. This is part of a pattern and practice of the City of Richmond and the Richmond PD
8 to protect officers who act unlawfully and criminally.

9 37. The City of Richmond has a history of retaining and protecting officers who are not
10 simply violent but a genuine criminals by any common standard defining the term. As set forth in
11 the following news articles and other matters in the public record, plaintiff makes the allegations
12 in paragraphs 38-43 which relate to a drug dealer/officer who was retained by Richmond PD
13 despite an FBI investigation. All allegations in these paragraphs are *contained in the public*
14 *record.*

15 A.

16 <https://www.eastbaytimes.com/2018/07/13/were-taking-this-seriously-da-reviewing-cases-involv>
17 [ing-richmond-cop-tied-to-drug-cartel/](https://www.eastbaytimes.com/2018/07/13/were-taking-this-seriously-da-reviewing-cases-involv);

18 B.

19 <https://sanfrancisco.cbslocal.com/2014/12/19/veteran-richmond-police-officer-fired-accused-of-c>
20 [orruption-in-many-drug-cases-sergeant-michael-wang/](https://sanfrancisco.cbslocal.com/2014/12/19/veteran-richmond-police-officer-fired-accused-of-c)

21 C.

22 <https://www.sfgate.com/bayarea/article/Richmond-to-pay-700K-to-police-informant-who-was-61>
23 [96766.php](https://www.sfgate.com/bayarea/article/Richmond-to-pay-700K-to-police-informant-who-was-61)

24 D.

25 http://www.nwcable.net/news/read/category/State/article/east_bay_times-east_bay_irish_mafia_tr
26 [ial_former_drug_cartel_memb-tca](http://www.nwcable.net/news/read/category/State/article/east_bay_times-east_bay_irish_mafia_tr)

1 E.

2
3 38. Richmond hired and retained officer Michael Wang despite the fact that Michael
4 Wang was being investigated by the F.B.I. for dealing drugs with members of a Mexican drug
5 cartel, and despite the fact that he had been alleged to have ordered a murder.

6 39. Michael Wang also revealed to a drug cartel member the identity of an informant.
7 This informant was shot.

8 40. The informant who was shot sued the City of Richmond and obtained a settlement.

9 41. When Michael Wang was being investigated, numerous files including informant files
10 vanished but Richmond took no action against Wang or any of the other involved officers to
11 determine why these important files vanished.

12 42. Investigations continued for years before Michael Wang was placed on administrative
13 leave. The destruction of files by Richmond PD officers and others was standard practice
14 endorsed by administrators, to protect wrongful and often criminal police conduct.

15 43. Michael Wang was aware of his own criminal exposure so that when he was issued a
16 subpoena to testify in a murder trial which had issues related to Wang's illegal activities, Michael
17 Wang asserted his Fifth Amendment rights and refused to testify.

18
19 **JURISDICTION**

20 44. This action arises under Title 42 of the United States Code, § 1983. Title 28 of the
21 United States Code, §§ 1331 and 1343 confers jurisdiction upon this Court. The unlawful acts
22 and practices alleged herein occurred in the City of Richmond, County of Contra Costa,
23 California, which is within the judicial district of this Court. This Court also has supplemental
24 jurisdiction over Plaintiff's state law causes of action under 28 U.S.C. § 1367.

25
26 **VENUE**

1 45. Venue is proper in this Court under 28 U.S.C. § 1391(b) because Defendants are
2 believed to reside in this district and all incidents, events, and occurrences giving rise to this
3 action occurred in this district.

4 **PARTIES**

5 46. Plaintiff Mandingo Hayes, is a resident of the state of California and is a United
6 States Citizen.

7 47. Defendant CITY OF Richmond (hereinafter "City") is an incorporated public entity
8 duly authorized and existing as such in and under the laws of the State of California; and at all
9 times herein mentioned, Defendant City has possessed the power and authority to adopt policies
10 and prescribe rules, regulations and practices affecting the operation of the Richmond Police
11 Department and its tactics, methods, practices, customs and usage. At all relevant times,
12 Defendant City was the employer of DOES Defendants, individually and as a peace officers.

13 48. Plaintiff is ignorant of the true names and capacities of those Defendants named
14 herein as DOES 1 through 25, inclusive. Plaintiff will amend this Complaint to allege said
15 Defendants true names and capacities when that information becomes known to Plaintiff.
16 Plaintiff is informed and believes, and thereon alleges that DOES 1 through 25, inclusive, are
17 legally responsible and liable for the incident, injuries, and damages hereinafter set forth, and that
18 each of said Defendants proximately caused the injuries and damages by reason of negligent,
19 careless, deliberately indifferent, intentional, or willful misconduct, including the negligent,
20 careless, deliberately indifferent, intentional, willful misconduct in creating and otherwise
21 causing the incidents, conditions, and circumstances hereinafter set forth, or by reason of direct
22 or imputed negligence or vicarious fault or breach of duty arising out of the matters herein
23 alleged. Plaintiff will seek to amend this Complaint to set forth said true names and identities of
24 DOES 1 through 25, inclusive, when they have been ascertained.

25 49. Plaintiff is ignorant of the true names and capacities of Defendants DOES 26 through
26 50, inclusive, and therefore sues these defendants by such fictitious names. Plaintiff is informed

1 and believes and thereon alleges that each Defendant so named was employed by Defendant City
2 at the time of the conduct alleged herein. Plaintiff alleges that each of Defendants DOES 26
3 through 50 were responsible for the training, supervision and/or conduct of the police officers
4 and/or agents involved in the conduct alleged herein. Plaintiff alleges that each of Defendants
5 DOES 26 through 50 was also responsible for and caused the acts and injuries alleged herein.
6 Plaintiff will amend this Complaint to state the names and capacities of DOES 26 through 50,
7 inclusive, when they have been ascertained.

8 50. Dedrick Riley is the police officer employed by the Richmond Police Department
9 (City of Richmond) who were directly involved in the conduct set forth in this complaint.
10 However, Riley not Mr. Hayes was the criminal perpetrator in this incident and Does 1-50 are
11 responsible for compounding and perpetuating the assault and other crimes by arresting Mr.
12 Hayes and by not arresting the criminal perpetrator, Riley.

13 51. Riley, acted in concert with the others and with knowledge of the unlawful conduct of
14 each of the others. Each such defendant and doe defendant acted to aid and abet, in conspiracy
15 with and to further and/or coverup the unlawful conduct of the other.

16 52. The City of Richmond is a public entity and is being sued under Title 42 U.S.C. §
17 1983 for violations of the First and Fourth Amendment of the United States Constitution, DOES
18 1 through 50, and each of them, who, at the time they caused Plaintiff's injuries and/or damages,
19 were duly appointed, qualified and acting officers, employees, and/or agents of City and acting
20 within the course and scope of their employment and/or agency.

21 53. Each of the Defendants caused and is responsible for the unlawful conduct and
22 resulting harm by, inter alia, personally participating in the conduct, or acting jointly and in
23 concert with others who did so, by authorizing, acquiescing, condoning, acting, omitting or
24 failing to take action to prevent the unlawful conduct, by promulgating or failing to promulgate
25 policies and procedures pursuant to which the unlawful conduct occurred, by failing and refusing
26 to initiate and maintain proper and adequate policies, procedures and protocols, and by ratifying

1 and condoning the unlawful conduct performed by agents and officers, deputies, medical
2 providers and employees under their direction and control.

3 54. The conduct described generally in herein includes but is not limited to, continued
4 support in the form of hiring, assignments to areas without day to day supervision and lack of
5 discipline to an officer known to have anger, violence, mental health and other problems. The
6 history of physical abuse and lying by Dedrick Riley was known to the Richmond Police
7 Department but it failed to adequately discipline, fire, reassign, train or control in any reasonable
8 manner, this violent individual.

9 55. Whenever and wherever reference is made in this Complaint to any act by Defendants
10 DOES 1 through 50, such allegations and references shall also be deemed to mean the acts and
11 failures to act of each DOE Defendant individually, jointly, or severally.

12 56. Riley was litigious and the City of Richmond placed its financial risks and benefits
13 involving litigation above any concerns for the safety of the public. This caused defendants to
14 protect Riley and to allow his continued employment. Out of neglect and self interest, the City of
15 Richmond had a policy of protecting rogue officers and in the instance herein, defendants and
16 each of them supported and ratified the wrongful conduct of Riley.

17 57. The conduct herein is part of a systemic, deliberate, policy and practice to allow
18 officer excesses, officer civil rights violations, excessive use of force, escalation of situations to
19 be perpetrated against residents of the City of Richmond. This policy and practice arose at a
20 time when telephones did not record video and before body worn cameras were standard. It is
21 part of a broader policy and practice of inadequate supervision, discipline, training and correction
22 leading to unnecessary confrontations and unsupervised unconstitutional conduct.

23 58. The pattern, practice and culture of abuse and lies by the Richmond Police
24 Department is entrenched and efforts to establish a pattern of just behavior, honest policing and
25 honest reporting have been inadequate, tentative and have contributed to the problem by creating
26 a veneer of concern for abuse covering up the fact that at the highest levels of the department the

1 continuing abuses are known and are known to exist without penalty to the offending officers.

2 59. Plaintiff is informed and believes and thereon alleges that members of the Richmond
3 Police Department, including, but not limited to DOES 1 through 25 and/or each of them, have
4 individually and/or while acting in concert with one another, engaged in a repeated pattern and
5 practice of using excessive, arbitrary and/or unreasonable force against individuals, including,
6 but not limited to Plaintiffs.

7 60. Plaintiff is informed and believes and thereon alleges that City knew or had reason to
8 know by way of actual or constructive notice of the aforementioned policy, culture, pattern
9 and/or practice and the complained of conduct and resultant injuries/violations. This pattern can
10 be seen in the repeated protection of Riley, the protection of Michael Wang and numerous other
11 coverups and failures to investigate, discipline, train or control officer misconduct.

12 61. At all material times, and alternatively, the actions and omissions of each Defendant
13 were conscience-shocking, reckless, deliberately indifferent to Plaintiff's rights, negligent, and
14 objectively unreasonable.

15 **DAMAGES**

16 62. As a consequence of Defendants' violations of Plaintiff's federal civil rights under 42
17 U.S.C. §1983 and the First and Fourth Amendment, Plaintiff was physically, mentally,
18 emotionally, and financially injured and damaged as a proximate result of Defendants' wrongful
19 conduct.

20 63. Plaintiff found it necessary to engage the services of private counsel to vindicate their
21 constitutional rights under the law. Plaintiff is therefore entitled to an award of attorneys' fees
22 and/or costs pursuant to statute(s) in the event that they are the prevailing party in this action
23 under 42 U.S.C. §§ 1983 and 1988.

24 64. Plaintiff is entitled to punitive damages under 42 U.S.C. §§ 1983 and 1988.

25
26 **JURY TRIAL REQUESTED**

1 65. Plaintiff demands a jury trial and by no conduct or admission waive that right unless
2 such waiver is expressly made in writing.

3 **FIRST CAUSE OF ACTION (42 U.S.C. Section 1983)**

4 (Violation of the Fourth Amendment of the United States Constitution-Unlawful Seizure)

5 (Against Defendants DOES 1-25)

6 66. Plaintiff hereby re-alleges and incorporates by reference herein paragraphs 1 through
7 65 of this Complaint.

8 67. Defendants' above-described conduct violated Plaintiff's rights as provided for under
9 the Fourth Amendment to the United States Constitution to be free from unreasonable searches
10 and seizures because Defendants lacked the requisite probable cause to arrest Plaintiff.

11 68. The unreasonable search and seizure includes but is not limited to the physical
12 detention, physical arrest and incarceration. This count relates to the physical arrest of Mr. Hayes
13 following the assault by Dedrick Riley as well as the physical restraint prior to the actual arrest.

14 **SECOND CAUSE OF ACTION (42 U.S.C. Section 1983)**

15 (Violation of the Fourth Amendment of the United States Constitution-First Amendment

16 (Against Defendants DOES 1-25)

17 69. Plaintiff hereby re-alleges and incorporates by reference herein paragraphs 1 through
18 65 of this Complaint.

19 70. Defendant's above-described conduct violated Plaintiff's rights under the First
20 Amendment to the United States Constitution to exercise his right to speech, to criticize police
21 conduct and to observe the conduct of police officers. This includes both the speech and video
22 recording.

23 **THIRD CAUSE OF ACTION (42 U.S.C. Section 1983)**

24 (Violation of the Fourth Amendment of the United States - Assault

25 (Against Defendants DOES 1-25)

26 71. Plaintiff hereby re-alleges and incorporates by reference herein paragraphs 1 through

1 65 of this Complaint.

2 72. Officer Riley under color of law struck Mr. Hayes knocking the recording cell phone
3 from his hands. He then physically assaulted Mr. Hayes. This count includes all physical contact
4 made by Officer Riley against Mr. Hayes.

5 73. Defendants and each of them are aware that the initial charging decision is made
6 based upon the police recommendations and written reports. By falsification these writings, the
7 defendants are deliberately seeking to induce a prosecution when plaintiffs to this case are in fact
8 the crime victims and the officers are the criminal perpetrators.

9
10 **FOURTH CAUSE OF ACTION**

11 (42 U.S.C. Section 1983)

12 (Monell - Municipal Liability for Unconstitutional Custom or Policy)

13 (Against Defendants City and DOES 26-50)

14 74. Plaintiff hereby re-alleges and incorporates by reference herein paragraphs 1 through
15 65 of this Complaint.

16 61. On information and belief, Defendants DOES 1-25's conduct, individually and as
17 peace officers, was ratified by City's police department supervisorial officers DOES 26-50.

18 62. On information and belief, Defendants were not disciplined for their use of excessive
19 force against Plaintiff, were not disciplined for their lies in their police reports, not disciplined
20 for their violation of plaintiff's First Amendment rights

21 63. On and for some time prior to the date of the wrongful conduct set forth above, (and
22 continuing to the present day), Defendants, individually and as peace officers, deprived Plaintiff
23 of the rights and liberties secured to him by the First, Fourth, and Fourteenth Amendments to the
24 United States Constitution, in that said Defendants and their supervising and managerial
25 employees, agents, and representatives, acting with gross negligence and with reckless and
26 deliberate indifference to the rights and liberties of the public in general, and of Plaintiff, and of

1 persons in Plaintiff's class, situation and comparable position in particular, knowingly
2 maintained, enforced and applied an official recognized custom, policy, and practice of:

3 a. Employing and retaining as police officers and other personnel, including Defendants,
4 individually and as peace officers; who at all times material herein knew or reasonably should
5 have known had dangerous propensities for abusing their authority and for mistreating citizens by
6 failing to follow written City Police Department policies, including the use of excessive force,
7 respect for the First Amendment, and permitting access to medical care;

8 b. Of inadequately supervising, training, controlling, assigning, and disciplining City Police
9 officers, and other personnel, including Defendants, who City knew or in the exercise of
10 reasonable care should have known had the aforementioned propensities and character traits,
11 including the propensity for violence and the use of excessive force and denying access to
12 medical care;

13 c. By maintaining grossly inadequate procedures for reporting, supervising, investigating,
14 reviewing, disciplining and controlling the intentional misconduct by Defendants, who are Police
15 Officers employed by City;

16 d. By failing to discipline City Police Officers' conduct, including but not limited to,
17 unlawful seizures, excessive force, denying access to medical care, and violations of the First
18 Amendment;

19 e. By ratifying the intentional misconduct of Defendants and other officers, who are Police
20 Officers employed by City;

21 f. By having and maintaining an unconstitutional policy, custom and practice of arresting
22 individuals without probable cause or reasonable suspicion, and using excessive force, which
23 also is demonstrated by inadequate training regarding these subjects. The policies, customs and
24 practices of Defendants were done with a deliberate indifference to individuals' safety and rights;
25 and

26 g. By failing to properly investigate claims of unlawful seizures and excessive force by City

1 Police Officers.

2 h. By allowing officers to maintain a culture of “us vs. them” that allows and promotes
3 coverups, false police reports and escalation of interactions.

4 I. By establishing policies that pretend to respect and enforce human rights when these
5 policies are known to be ineffective or of limited effect and to then pretend that the
6 department has changed its long standing policy of “us vs. them” as a policy and practice.

7 j. By having superior officers review police reports without watching video footage the
8 officers were able to invent a story line without real supervision or real critique of their reports or
9 conduct.

10 k. The practice of allowing officers to define their own conduct and to not have a standard policy,
11 practice and procedure to critically review incidents involving violence with citizens/arrestees,
12 the city and department encourage aggressive conduct, unlawful conduct and post police offense
13 coverups. The officers know that review procedures are ponderous, lawsuits are defended at the
14 city/department’s expense and without regard to moral principles or protection of the public. The
15 system emboldens and protects wrongful police conduct.

16 l. By reason of the aforementioned policies and practices of Defendants, individually and as
17 peace officers, Plaintiffs were injured as set forth herein and for all of which Plaintiff is entitled
18 to recover damages.

19 64. These Monell allegations apply to each and every action, each and every claim herein.

20 65. Defendants, individually and as peace officers, together with various other officials,
21 whether named or unnamed, had either actual or constructive knowledge of the deficient policies,
22 practices and customs alleged in the paragraphs above. Despite having knowledge as stated
23 above, these defendants condoned, tolerated and through actions and inactions thereby ratified
24 such policies.

25 66. Said defendants also acted with deliberate indifference to the foreseeable effects and
26 consequences of these policies with respect to the constitutional rights of Plaintiff and other

1 individuals similarly situated.

2 67. By perpetrating, sanctioning, tolerating and ratifying the outrageous conduct and other
3 wrongful acts, Defendants, individually and as peace officers, acted with an intentional, reckless,
4 and callous disregard for the rights of Plaintiff. Each of their actions was willful, wanton,
5 oppressive, malicious, fraudulent, and extremely offensive and unconscionable to any person of
6 normal sensibilities.

7 68. Furthermore, the policies, practices, and customs implemented and maintained and
8 still tolerated by Defendants, individually and as peace officers, were affirmatively linked to and
9 were a significantly influential force behind the injuries of Plaintiff.

10
11 WHEREFORE, Plaintiff prays for relief as hereinafter set forth.

- 12 1. General damages according to proof;
- 13 2. Special damages according to proof;
- 14 3. Attorney’s Fees and costs of suit according to proof;
- 15 4. Such statutory and other damages and awards as allowed by law;
- 16 5. For such other and further relief as the Court deems proper.

17
18 Dated: June 29, 2020

Daniel Horowitz

19 _____
Daniel Horowitz
Attorney for Plaintiffs

20
21 Dated: June 29, 2020

Thomas Kensok

22 _____
Thomas Kensok

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Complaint for Damages
Case No. 20-4283

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Complaint for Damages
Case No. 20-4283