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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

)	
VS.)	17CV: 00
CITY OF BRIDGEPORT,)	
ARMANDO PEREZ, JAMES BOULAY,)	
JOHN DOE #1-#4)	MAY 16, 2017

COMPLAINT

JURISDICTION

1. This Court has federal question jurisdiction pursuant to 28 USC Section 1331.

FACTS

2. Defendants James Boulay, and John Does #1-4 are Bridgeport Police Officers, and employees and/or agents of the defendant City of Bridgeport.

3. The defendant Armando Perez is the Chief of the Bridgeport Police Department and an employee and/or agent of the City of Bridgeport.

4. The City of Bridgeport is a municipal corporation chartered under the laws by the State of Connecticut

3. On or about May 9, 2017, the individual defendants participated during and/or afterwards in the shootings of the plaintiff and Jason Negron.

4. On that same date, defendant James Boulay and John Does 1-4 were engaged in a routine traffic stop of a car driven by Jayson Negron in which the plaintiff was a passenger.

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5. During said stop, the defendants Boulay and John Does 1-4, forcibly attempted to remove Jayson Negron and _____ from the car before following standard police procedure.

6. During said stop, and in violation of Bridgeport police rules and procedures, and the constitutional rights of the occupants of said vehicle, the defendant Boulay and/or one of the John Does 1-4 shot Jayson Negron and _____ multiple times.

7. Then and there, the defendants Boulay and/or John Does 1-4 threw the injured occupants, Negron and _____ to the ground and handcuffed them without summoning and/or providing emergency medical aid.

8. As a result _____ suffered additional injuries and Negron died of his wounds while handcuffed to the pavement.

9. The defendant Armando Perez also failed to summon medical aid.

10. Moreover, the defendant Perez lied in public statement about the actions of Negron and _____ in an effort to cover up the illegal and unconstitutional actions of Boulay and John Does 1-4.

11. Further, the defendant Perez disparaged and slandered the plaintiff _____ and _____ in an attempt to cover up the actions of his officers Boulay and John Does 1-4.

Causes of Action

Count One As to the Boulay and Does 1-4

12. These defendants violated the U.S. Constitution's 4th and 14th amendment rights of the plaintiff in one or more of the following ways:

- a) they attempted to stop said vehicle without probable cause;

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b) they forcibly seized the plaintiff and Negron during a routine traffic stop;

c) they incapacitated the plaintiff and Negron through the unjustified use of deadly force.

13. This is actionable under 42 USC Section 1983.

Count Two As to the Boulay, Perez and Does 1-4

14. These defendants violated the U.S. Constitution's 4th, 8th and 14th Amendment rights of the plaintiff by failing to provide immediate medical care, handcuffing him, and failing to get him and Jayson Negron immediate medical care.

15. This is actionable under 42 USC Section 1983.

Count Three As to the Boulay, Perez and Does 1-4

16. These defendants violated the U.S. Constitution's 14th Amendments rights of the plaintiff by falsely reporting the actions of the plaintiff and Negron before and after the traffic stop.

17. In particular, these defendants falsely claimed that the plaintiff and Negron attempted to evade the traffic stop, that officers were pinned under the car, that multiple cars were hit by Negron, that the plaintiff failed to comply with police orders, and that officers suffered injuries and had no choice.

18. This is actionable under 42 USC Section 1983

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Count Four As to the City of Bridgeport

19. The City is responsible for the negligent acts of its employees and agents including the named individual defendants under C.G.S. Section 52-557n.

20. The individual defendants negligently violated one of more of the following ministerial duties imposed on police officers in the City of Bridgeport:

a) they failed to implement clear rules regarding how to conduct a traffic stop by attempting to forcibly remove Negron and _____ from the vehicle;

b) they used deadly force in violation of their own rules;

c) they failed to provide or order medical care for _____ and Negron.

21. To the extent that any of these duties are discretionary, _____ represents an identifiable victim in imminent harm by virtue of their negligent exercise of their discretionary duties.

Count Five As to Armando Perez

22. The defendant Perez slandered the plaintiff _____ and Negron as described above and as such is liable to _____ for slandering his good name and reputation.

Damages

23. As a result of the above conduct, the plaintiff _____ suffered gunshots to his person, narrowly averted death, experienced great pain and suffering, witnessed the death and shooting of his close friend, and was injured in his reputation.

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24. as a still further result, the plaintiff incurred and will continue to incur medical expenses, a diminishment of his earning capacity, permanent physical and emotional scarring, and an impairment of his ability to enjoy all of life's other activities.

25. Furthermore, the plaintiff has incurred and will continue to incur attorneys fees and costs.

Wherefore the plaintiff requests damages in excess of \$6,000,000 plus costs and attorneys fees.

THE PLAINTIFF

BY: /S/MICHAEL A. STRATTON CT 08166
MICHAEL STRATTON, ESQ.
STRATTON TRIALS
33 KING STREET
STRATFORD, CT 06615
203.266.1300
mike@strattontrials.com