

SHARON BRIDGEWATER
12070 W. Outer Drive
Detroit, MI 48223

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JAMES N. HATTEN, Clerk
By: *[Signature]*

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SHARON BRIDGEWATER

PLAINTIFF

CV-

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF(FIRST AMENDED)**

vs.

DEKALB COUNTY, by and
through Vernon Jones, Chief

Executive Officer, N. T. MARINELLI
Chief of Police for the Dekalb
County Police Department and

POLICE OFFICER C. SCHREINER, #2491
Individually and in her official capacity as the Arresting Officer,

DETECTIVE GEORGE
Individually and in his/her official capacity as Detective,

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Lieutenant Hamilton
Individually and in her/his official capacity as Lieutenant,

AND DOES 1 THUR 50

Defendants.

DEFENDANTS

The defendants employees for the Dekalb County Police Department

PLAINTIFF

1. Sharon Bridgewater is a natural person and a citizen of Michigan.
2. At all times mentioned herein Plaintiff was in lawful, peacefully driving her newly brought Van and was not disturbing anybody.
3. Plaintiff at all times mentioned founded, started Specialty Global Investments INC., known as The Specialty Investment Group LLC, with Investment Partners in Michigan, Georgia, Nevada, and California, a Real Estate Investment/Solar Energy Company with “promising Investment Partners” and Investors in the State of Georgia.

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

1 4. Plaintiff at all times mentioned obtained a degree from the University of
2 Michigan.

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4 5. Plaintiff at all times mentioned was a student working on a Master Degree.

5 6. At all times mentioned Plaintiff was mentally disabled as defined by the
6 Social Security Administration and was on the complete "verge" of
7 "TOTAL rehabilitation from the mental disability.

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9 7. The defendant's reckless disregard for the Plaintiff civil rights has caused
10 emotional instability and a return of her disability status.
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15 **STANDARD OF REVIEW**
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18 On or about Oct. 30, 2007, the defendants stopped the Plaintiff while she was
19 driving her van, for no reason, left the scene of the traffic stop, traveled to the
20 Plaintiff place of business, "forced" their way into the house, and took all of
21 Plaintiff's paper work, etc. and willfully, violated the Plaintiff's civil rights
22 (see exh.1). Shortly after that incident, when the Plaintiff returned back home to
23 California, "another" party maliciously prosecuted, conspired AND WILLFULLY
24 violated the Plaintiff for no reason in Dec. 2007, which caused the Plaintiff
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FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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3 “extensive” emotional damage. The case is pending before pending before the
4 “criminal” Federal Judge Sandra Brown Armstrong in Northern District Federal
5 Court of California.(see Northern District Court of California case # CV-0703, and
6 CV-0704).(see exhibit 2)
7

8 Both incidents, has caused the Plaintiff extensive damage and a total collapse
9 in mental and emotional stability due to the defendant, as well as the current case
10 pending before the Honorable civil rights has been willfully, violated and the
11 Plaintiff has mental scars, fears, suffers from fright, horror due to her Emotional
12 distress includes suffering, anguish, grief(due to recent death of father),fright,
13 horror, nervousness, anxiety, worry, shock, humiliation, and shame. Plaintiff
14 relocates constantly due to her “horrible” experience of being forced out of her
15 apartment, from a “conspiracy” to willfully violate Plaintiff’s civil rights and
16 unable to file the complaint due to her the willful violations of Plaintiff civil rights.
17 Plaintiff have been homeless and displaced, for nearly two years just obtained
18 normal housing in June 2009. The Plaintiff was just able to finish the complaint.
19 The Plaintiff seeks to toll the Statue of limitation due to an unfortunate incidents of
20 willful violation of her civil rights.
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FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

COMPLAINT

1.

This is a civil rights lawsuit brought by the Plaintiff, a victim of illegally search and seizure. Compensatory and punitive damages are sought against the police officers involved, for violating her civil rights, and compensatory damages, and punitive damages are sought against the Dekalb County Police Department.

2.

This action arises under the Fourth and Fourteenth Amendments to the United States Constitution, and under the Civil Rights Act of 1871, 42 U.S.C. sections 1983.

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5 Plaintiff, Sharon Bridgewater is a natural person and citizen of Detroit, MI
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12 Defendant, DeKalb County, is a county in the state of Georgia. DeKalb county and
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14 their agency the DeKalb County Police Department, may be served
15 by and through Vernon Jones, the Chief Executive Officer, at 1300 Commerce
16 Drive, Decatur, GA 30030.
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22 Defendant, Police Officer C. Schreinder # 2491 is an Officer of the Dekalb County
23 Police Department and may be served at the DeKalb County Police Department,
24 3630 Camp Circle, Decatur, GA 30032.
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FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

6.

Defendant, N. T. Marinelli, is the Chief of Police for the Dekalb County Police Department and may be served at the DeKalb County Police Department, 3630 Camp Circle, Decatur, GA 30032.

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Defendant, Detective George is a Decective of the Dekalb County Police Department and may be served at the DeKalb County Police Department, 3630 Camp Circle, Decatur, GA 30032.

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Defendant, Leutinenant Hamilton is a leutinenant of the Dekalb County Police Department and may be served at the DeKalb County Police Department, 3630 Camp Circle, Decatur, GA 30032.

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

FACTUAL ALLEGATIONS

9.

On or about Oct. 31, 2007 at approx. 3: 40 P.M. the Plaintiff was driving her newly brought Van, with a new "NOT EXPIRED," properly displaced "DRIVE OUT TAG;" and driving in peaceful, legally driving, with regular flow of traffic going to her place of business located at 2555 Field Spring Dr. Lithonia, Georgia.

(SEE EXH. 1)

10.

The Plaintiff was stopped for no reason, just because she was driving with a "DRIVE OUT TAG," despite the fact that it is declared unconstitutional by the Supreme Court of Georgia(~~Berry, 248, GA App at 878~~)to stop a person for a Drive Out tag.

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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8 The Plaintiff violated no traffic violation.
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13 Upon the initial stop Officer Schreinder scrutinized the Plaintiff, for no reason.
14 scrutized the Plaintiff employees. Look into the van and notice the Plaintiff
15 business (Real Estate) appliances. The Officer Schreinder asked the Plaintiff
16 whose stainless steal appliances were in the back of the van. The Plaintiff
17 responded, and told the Officer they were her appliances. Officer Schreinder then
18 called other police Officers to the scene. The Officers detained the Plaintiff and
19 her employees for no reason at all. During the detainment the Plaintiff and her
20 employees were not free to leave. Some of the Officers left the scene of the traffic
21 stop, got in their cars and traveled to the Plaintiff place of business and
22 "BROKE/FORCED" their way into the Plaintiff's place of business/residence
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FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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3 **without a search warrant** and **without the Plaintiff permission**, rambling
4 through the Plaintiff business and personal papers, and obtained the Plaintiff's
5 Investors Partner phone number, contacted and questioned him about the Plaintiff
6 business affairs.
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10 13.

11 The Defendants arrested the Plaintiff for driving on suspended license, a Plaintiff,
12 and the Plaintiff was detained in Dekalb County Jail for two days and released.
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14 The Plaintiff received a ticket for her tags and suspended license The Plaintiff at all
15 times mentioned was a citizen of California and had a valid California Drivers
16 license at the time of the incident.
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20 14.

21 The defendants took all of the Plaintiff's Business/Personal paper work, tax
22 receipts, computers, pictures, personal documents, cell phones and other items
23 from her business **without the Plaintiff permission** and without **a search**
24 **warrant**.
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4 The Plaintiff Van, was impounded along with her 2 stainless steal refrigerators, 2
5 stoves and a smaller refrigerator, and the Plaintiff lost these items due to the
6
7 reckless disregard of the Officers.
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11 The defendants investigated the incident and dismissed the case in April 2009.
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18 The Plaintiff contacted Sgt. George in or about Sept. or Oct. 2009, and requested
19 the return of her paper work and items taken from the house and told the Sgt. her
20 intentions of suing the Police Dept. It is Plaintiff belief, and then instructed her
21 colleagues to pursue the Plaintiff "AS VICTIM," committing crimes against the
22 Plaintiff, and Public Justice.
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6 The Defendants' actions were under the color of law.
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14 The Plaintiff had a right^{to} enjoy and exercise her fourth and fourteenth US
15 Constitutional rights as secured by the United States Constitution. The Plaintiff
16 had a right to be free from illegal searches and seizures. The Plaintiff had a right
17 to drive her car with a "drive out tag," and due process of law.
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21 20.
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23 The actions of each Defendants action are in violation of clearly established law
24 which it is unconstitutional for ANY PERSON TO WILLFULLY VIOLATE THE
25 PLAINTIFF CIVIL RIGHTS.
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FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

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3 21.

4 Defendant, N. T. MARINELLI, is the final decision maker for any policy and
5 procedure relating to the arrest and detention of the Plaintiff.
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8 22.

9 DeKalb County has customarily arrested detained and violated citizen's fourth
10 and fourteenth amendment Constitutional rights.
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15 23.

16 DeKalb County has failed to instruct, supervise, and control officers
17 regarding the unconstitutionality of arresting persons stopping individual for
18 driving with a "DRIVE OUT TAG" and in going into citizen's homes without a
19 search warrant and violating people civil rights.
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24.

The actions of Officer Schreiner #2491 and the above named defendants have deprived Plaintiff of her Fourth Amendment (illegal search and seizures)

Constitutional right as secured ^{by} the United States Constitution. The Defendants ^{have} deprived Plaintiff of her Fourth ^{teenth} Amendment right ^{as secured by the U.S.}

^{the} Constitution. Officer Schreinder #2941 and the defendants violated Plaintiff's four and fourteenth US Constitution rights as secured by the amendment US constitution.

The Defendants' actions constitute an unlawful deprivation of Plaintiffs' liberty, and property, search and seizure without due process of law.

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The Defendants' actions were reckless and callously indifferent to the Plaintiffs' federally protected rights.

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6 The actions of Police Officer Schreinder #2491 and the defendant's actions were
7 taken intentionally to injure Plaintiff.
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13 Plaintiff is entitled to actual, compensatory and special damages against both
14 Defendants under federal law, including emotional distress. Because Officer
15 Schreinder #2491 and the defendants acted with reckless disregard of Plaintiff's
16 constitutional rights, Plaintiff is entitled to punitive damages.
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22 Plaintiff is entitled to reasonable attorney fees under 42 U.S.C. § 1988 because of
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24 Officer Schreiner and the defendants intentional tortious conduct.
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3 **WHEREFORE**, Plaintiff prays:

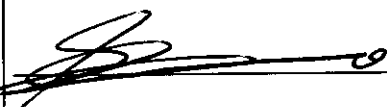
- 4 1. That the Court assume jurisdiction in this case.
- 5 2. That the Court award damages as prayed for above;
- 6 3. For jury trial;
- 7 4. For attorneys fees, costs and expenses as permitted by law; and
- 8 5. Punative damages.
- 9 6. A temporary restraining order, ordering the defendants to send to the Plaintiff
- 10 her items at once. The return of office and person paper work, office
- 11 computers, tax receipts and statements, and any and all items taken from the
- 12 residence, and a temporary restraining order, ordering the defendants to return
- 13 these items.
- 14 7. The Plaintiff respectfully requests the court to fill out the temporary restraining
- 15 order (a time frame to return Plaintiff's items and permanent injunction Order
- 16 to return items.
- 17 8. Damages of compensatory, special and/or general damages.
- 18 9. Expedited Discovery
- 19 10. Order the defendants to give Plaintiff a list of names of Dekalb County Police
- 20 Officer who entered her place of business illegally, who are to be added to this
- 21 complaint as "DOES defendants."
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FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

1 11. Expediated Trial

2 12. For such other and further relief as this Court may deem just and
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4 appropriate.

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9 Respectfully submitted,

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14 Sharon Bridgewater

15 Plaintiff
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20 Dated: April 15, 2010
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FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

VERIFICATION

I Sharon Bridgewater Declare:

I am the Plaintiff in the above entitled action.

I make this verification because the facts set forth in the complaint are within my Knowledge and it is I who entered into the Stipulated Judgment with defendants in the underlining unlawful detainer.

I have read the foregoing complaint and know the contents thereof.

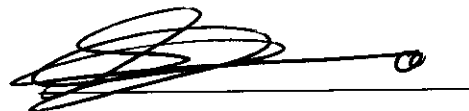
The same is true of my own knowledge.

I except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true.

I Sharon Bridgewater declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: April 15 , 2010

At Atlanta, Georgia or/and Detroit, Michigan



Sharon Bridgewater

FIRST AMENDED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF