

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHARLES GREEN,)
)
 Plaintiff,)
) No. 01 CV 8276
 -vs-)
) (*Judge Darrah*)
 FOX VALLEY PARK DISTRICT POLICE)
 OFFICER GREGORY FLOWERS,)
)
 Defendant.)

COMPLAINT

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this Court is conferred by 28 U.S.C. §1343.
2. Plaintiff Charles Green is a resident of the Northern District of Illinois.
3. Defendant Gregory Flowers is employed as a police officer by the Fox Valley Park District and, at all times relevant, was acting color of his office as a police officer. Flowers is sued in his individual capacity only.
4. In the evening of October 22, 2001, defendant Flowers arrested plaintiff on an outstanding misdemeanor warrant and transported plaintiff to the Kane County Jail.
5. At the Kane County Jail, Flowers used excessive and unreasonable force, and acting maliciously and in a willful and wanton manner, broke plaintiff's arm.

6. Plaintiff believes that Flowers' use of excessive and unreasonable force was recorded on videotape by a surveillance camera at the jail.
7. Flowers' above described actions caused plaintiff to be deprived of rights secured by the Fourth and Fourteenth Amendments to the Constitution of the United States, suffer bodily harm, experience great pain and suffering.
8. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that compensatory damages be awarded against defendant Flowers in an amount in excess of one hundred thousand dollars and that punitive damages be awarded against defendant Flowers in an amount equal to his gross salary for one year.

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