

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

Eastern Division

1:17 CV 2343

Case No.

(to be filled in by the Clerk's Office)

Ante Peric

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

"see attached"

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) Yes No

JUDGE OLIVER

MAG. JUDGE BAUGHMAN

2017 NOV -7 PM 3:29

FILED

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS (Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

DEFENDANT LIST

Cuyahoga County Ohio

City of Strongsville Ohio

Joy A Peric

Anna M Parise, esq

City of Strongsville Prosecutor office, George Lonjack Prosecutor

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Ante Peric
 Address 5000 Royalton Rd unit A3
North Royalton OH 44133
City State Zip Code
 County Cuyahoga
 Telephone Number 716 533 3391
 E-Mail Address godscro@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name City of Strongsville, OH
 Job or Title (if known)
 Address 16099 Foltz Parkway
Strongsville OH 44149
City State Zip Code
 County Cuyahoga
 Telephone Number 440 580 3145
 E-Mail Address (if known) strongsville.law@strongsville.org
 Individual capacity Official capacity

Defendant No. 2

Name George Lonjack
 Job or Title (if known) Prosecutor for City of Strongsville
 Address 16099 Foltz Parkway
Strongsville OH 44149
City State Zip Code
 County Cuyahoga
 Telephone Number 440 580 3145
 E-Mail Address (if known)
 Individual capacity Official capacity

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Defendant No. 3

Name Anna M Parise, esq
 Job or Title (if known) Attorney - Partner at Dworken & Bernstein
 Address 60 South Park Place
Fainesville OH 44077
City State Zip Code
 County Lake
 Telephone Number 440 352 3391
 E-Mail Address (if known) a.parise@dworkenlaw.com
 Individual capacity Official capacity

Defendant No. 4

Name Joy A Feric
 Job or Title (if known) _____
 Address 4148 Madison Ave
Willoughby OH 44094
City State Zip Code
 County Lake
 Telephone Number 440 655 4418
 E-Mail Address (if known) joyabuckley@yahoo.com
 Individual capacity Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- Federal officials (a *Bivens* claim)
- State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

42 USC § 1985, 1986; 18 USC § 643/emoluments violations

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Defendant # 5

Cuyahoga County Ohio

1200 Ontario St

Cleveland, OH 44113

216 443 7800

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Does the Court wish for oral argument or a brief?

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Berea Municipal Court

- B. What date and approximate time did the events giving rise to your claim(s) occur?

September 29th 2017

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

Prosecutor Failed to produce the contract therefore lacks standing to pursue prosecution against Ante Peric. *Marbury v. Madison*, 5 US 137 (1803)

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Pending incarceration & libelous entries into my public Record File which negatively affects my ability to work.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I want this case Terminated and my name Cleared.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

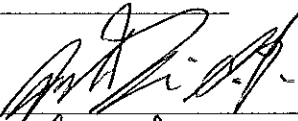
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff

Printed Name of Plaintiff


Ante Peric

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

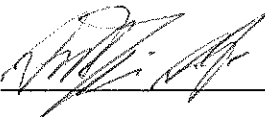
Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address


5200 Royalton Rd Unit #3
North Royalton OH 44133
216.533.3391
godscro@yahoo.com