

SUMMONS - CIVIL

JD-CV-1 Rev. 9-14

C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a,
52-48, 52-259, P.B. Secs. 3-1 through 3-21, 8-1STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

See other side for instructions

"X" if amount, legal interest or property in demand, not including interest and costs is less than \$2,500.
 "X" if amount, legal interest or property in demand, not including interest and costs is \$2,500 or more.
 "X" if claiming other relief in addition to or in lieu of money or damages.

TO: Any proper officer; BY AUTHORITY OF THE STATE OF CONNECTICUT, you are hereby commanded to make due and legal service of this Summons and attached Complaint.

Address of court clerk where writ and other papers shall be filed (Number, street, town and zip code) (C.G.S. §§ 51-346, 51-350)		Telephone number of clerk (with area code) (860) 548-2700	Return Date (Must be a Tuesday)
95 Washington Street, Hartford CT 06106			September 15, 2015
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> Housing Session G.A. Number: Hartford		At (Town in which writ is returnable) (C.G.S. §§ 51-346, 51-349)	Month Day Year
			Case type code (See list on page 2)
			Major: M Minor: 90

For the Plaintiff(s) please enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code) Fazzano & Tomasiewicz, LLC 96 Oak Street Hartford, CT 06106		Juris number (to be entered by attorney only) 414049
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Telephone number (with area code) (860) 231-7766	Signature of Plaintiff (If self-represented)	Email address for delivery of papers under Section 10-13 (if agreed to) mdimock@ftlawct.com
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Number of Plaintiffs:	Number of Defendants: 5	<input checked="" type="checkbox"/> Form JD-CV-2 attached for additional parties
Parties Name (Last, First, Middle Initial) and Address of Each party (Number; Street; P.O. Box; Town; State; Zip; Country, if not USA)		
First Plaintiff	Name: Nolan, Daniel Address: 218 Shore Road, Waterford, CT 06385	
Additional Plaintiff	Name: Address:	
First Defendant	Name: Huertas, Carlos, in his individual and official capacity, VIA HARTFORD TOWN AND CITY CLERK Address: 550 MAIN STREET, HARTFORD, CT 06103	
Additional Defendant	Name: Brady, Scott, in his individual and official capacity, VIA HARTFORD TOWN AND CITY CLERK Address: 550 MAIN STREET, HARTFORD, CT 06103	
Additional Defendant	Name: Martin, Roger, in his individual and official capacity, VIA HARTFORD TOWN AND CITY CLERK Address: 550 MAIN STREET, HARTFORD, CT 06103	
Additional Defendant	Name: Segarra, Pedro, Mayor, in his official capacity, VIA HARTFORD TOWN AND CITY CLERK Address: 550 MAIN STREET, HARTFORD, CT 06103	

Notice to Each Defendant

1. **YOU ARE BEING SUED.** This paper is a Summons in a lawsuit. The complaint attached to these papers states the claims that each plaintiff is making against you in this lawsuit.
2. To be notified of further proceedings, you or your attorney must file a form called an "Appearance" with the clerk of the above-named Court at the above Court address on or before the second day after the above Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to come to court.
3. If you or your attorney do not file a written "Appearance" form on time, a judgment may be entered against you by default. The "Appearance" form may be obtained at the Court address above or at www.jud.ct.gov under "Court Forms."
4. If you believe that you have insurance that may cover the claim that is being made against you in this lawsuit, you should immediately contact your insurance representative. Other action you may have to take is described in the Connecticut Practice Book which may be found in a superior court law library or on-line at www.jud.ct.gov under "Court Rules."
5. If you have questions about the Summons and Complaint, you should talk to an attorney quickly. The Clerk of Court is not allowed to give advice on legal questions.

Signed (Sign and "X" proper box)	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Name of Person Signing at Left Mario Cerame	Date signed 08/03/2015
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If this Summons is signed by a Clerk:	For Court Use Only
a. The signing has been done so that the Plaintiff(s) will not be denied access to the courts. b. It is the responsibility of the Plaintiff(s) to see that service is made in the manner provided by law. c. The Clerk is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this Summons at the request of the Plaintiff(s) is not responsible in any way for any errors or omissions in the Summons, any allegations contained in the Complaint, or the service of the Summons or Complaint.	File Date

I certify I have read and understand the above:	Signed (Self-Represented Plaintiff)	Date
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Name and address of person recognized to prosecute in the amount of \$250		
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Signed (Official taking recognition; "X" proper box)	<input checked="" type="checkbox"/> Commissioner of the Superior Court <input type="checkbox"/> Assistant Clerk	Date 08/03/2015	Docket Number
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CIVIL SUMMONS
CONTINUATION OF PARTIES
JD-CV-2 Rev. 9-12

STATE OF CONNECTICUT
SUPERIOR COURT

First named Plaintiff (Last, First, Middle Initial)

Nolan, Daniel

First named Defendant (Last, First, Middle Initial)

Huertas, Carlos

Additional Plaintiffs

Name (Last, First, Middle Initial, if individual)	Address (Number, Street, Town and Zip Code)	CODE
		03
		04
		05
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		08
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		12
		13

Additional Defendants

Name (Last, First, Middle Initial, if individual)	Address (Number, Street, Town and Zip Code)	CODE
The City of Hartford, VIA HARTFORD TOWN AND CITY CLERK, 550 MAIN STREET, HARTFORD, CT 06103		05
The Hartford Fire Department, VIA HARTFORD TOWN AND CITY CLERK, 550 MAIN STREET, HARTFORD, CT 06103		06
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	12	FOR COURT USE ONLY - File Date
	13	
	14	Docket number

RETURN DATE: SEPTEMBER 15, 2015 : SUPERIOR COURT
DANIEL NOLAN : JUDICIAL DISTRICT OF HARTFORD
v. : AT HARTFORD
CARLOS HUERTAS : AUGUST 3, 2015
in his individual and official capacities,
SCOTT BRADY :
in his individual and official capacities,
ROGER MARTIN :
in his individual and official capacities,
MAYOR PEDRO SEGARRA :
in his official capacity,
THE CITY OF HARTFORD, and :
THE HARTFORD FIRE DEPARTMENT :

COMPLAINT

INTRODUCTION

1. This is a civil rights action brought by Daniel Nolan, the plaintiff, pursuant to 42 U.S.C. § 1983 and General Statutes § 31-51q, in vindication of speech and press rights guaranteed by the first and fourteenth amendments to the United States constitution as well as article the first, §§ 4, 5, and 14 of the Connecticut constitution; and in vindication of procedural and substantive due process rights guaranteed by the fourteenth amendment to the United States constitution as well as article the first, §§ 8, 9, and 10 of the Connecticut constitution; along with related claims for abuse of process, intentional infliction of emotional distress, and civil conspiracy to commit these wrongs.

2. This action is filed against Chief Carlos Huertas (defendant Huertas) in his individual and official capacities, Interim Assistant Chief Scott Brady (defendant Brady) in his individual and official capacities, Fire Marshal Roger Martin (defendant Martin) in his individual and official capacities, Mayor Pedro Segarra (defendant Segarra) in his official capacity, the City of Hartford (city), and the Hartford Fire Department (department).
3. Among other things, these defendants individually or collectively:
 - a. ordered Mr. Nolan on October 14, 2014 not to communicate concerns he held to OSHA authorities and punished him for his refusal to comply;
 - b. punished Mr. Nolan for his speech to a reporter on October 28, 2014, concerning the Board of Inquiry into the death of Kevin Bell and Injuries to Jason Martinez (board of inquiry);
 - c. ordered Mr. Nolan and others on November 3, 2014, to keep hidden from the public that defendant Huertas charged the board of inquiry to “stand down;” this order restrained their speech;
 - d. punished Mr. Nolan on November 6, 2014, by removing him, without process, from his appointed position as Chair of the board of inquiry because Mr. Nolan refused to mislead the public in accordance with defendant Huertas’s charge in the preceding paragraph that restrained speech;
 - e. punished Mr. Nolan on November 15, 2014, by arbitrarily issuing an order to withhold stand-by pay from the training division staff, which are under Mr. Nolan’s command, as retaliation for speech critical of the department leadership;
 - f. punished Mr. Nolan because of embarrassment defendant Huertas suffered in the institutional media, which acquired copies of speech between Mr. Nolan and defendant Huertas through the Freedom of Information Act; this media coverage came in the form of critical news stories, including editorials and a cartoon; this criticism grew to a fevered pitch between December 6, 2014 and December 13, 2014 and continued through 2015;

- g. punished Mr. Nolan for the viewpoint of his speech by passing him over for promotion to Assistant Chief on March 28, 2015, even though Mr. Nolan scored best among all candidates in the process;
- h. punished Mr. Nolan for the viewpoint of his speech, and explicitly and specifically for his speech to the media, by removing him from the board of inquiry, *de jure* for four days, from April 10, 2015, through April 15, 2015; and by removing him from the board, *de facto*, from November 6, 2014, to the present;
- i. punished Mr. Nolan for filing a grievance against defendant Huertas, in which Mr. Nolan pointed out defendant Huertas's failure to communicate effectively;
- j. in substance, ordered Mr. Nolan to freeze his speech criticizing department leadership on April 16, 2015, by ordering him to leave a designated public forum under sham pretenses and predominantly motivated by viewpoint discrimination;
- k. punished Mr. Nolan by placing him on administrative leave for more than three months for his speech to the media on April 16, 2015 and his speech at other times critical of the department leadership, under sham pretenses and predominantly motivated by viewpoint discrimination,
- l. punished Mr. Nolan by placing him on unpaid suspension for thirty days for his speech to the media on April 16, 2015 and his speech at other times, under sham pretenses and predominantly motivated by viewpoint discrimination; and
- m. otherwise harassed and punished Mr. Nolan in an attempt to silence him for his speech critical of the leadership of the department, to chill the speech of others by making an example of Mr. Nolan, and to deprive the public of its right to know about the operations of government officials.

4. The plaintiff seeks equitable and declaratory relief, compensatory damages, punitive damages, and reasonable attorneys' fees.

THE PARTIES

The Plaintiff

5. At all relevant times, Mr. Nolan was a resident of Waterford, Connecticut and employed by the city as the Deputy Chief of Training of the department.
6. Mr. Nolan has been a firefighter and member of the department for thirty-two years. He has served under six different Fire Chiefs of the department, and he is the most senior of all the Deputy Chiefs. He is the highest ranking individual in the department who is still a member of the union. Accordingly, he has special expertise, experience, and perspective to offer valuable criticism concerning the operations of the department.
7. Mr. Nolan is a combat veteran of two wars and highly decorated, including being awarded the Bronze Star. He is Commander of the 246th Engineer Detachment in the Connecticut National Guard, a firefighter unit. He is frequently involved in charity; he is on the Board of Lea's Foundation, which funds research to cure leukemia and related diseases, and he assists with numerous others. Mr. Nolan accords a special value to virtue, integrity, and self-sacrifice.

The Defendants

8. At all relevant times, defendant Huertas was employed by the city as Chief of the department.
9. As of April 10, 2015, and at all relevant times thereafter, defendant Brady was employed by the city as Interim Assistant Chief of the department.
10. At all relevant times, defendant Martin was employed by the city as Fire Marshal of the department.
11. At all relevant times, defendant Segarra held the office of Mayor of the city.
12. The city of Hartford is a municipality in the state of Connecticut.

13. The department is a government agency operating in the city.

STATEMENT OF FACTS

Background & Board of Inquiry

14. On October 7, 2014, firefighter Kevin Bell perished, and three other firefighters were injured, during a response to a structure fire.
15. Although the plaintiff is the department safety officer, he was not called to the scene or informed of the death that evening.
16. Between October 8, 2014, and October 15, 2014, the plaintiff communicated concerns he held to defendant Huertas, including the plaintiff's intention to contact the Occupational Safety and Health Administration (OSHA).
17. In an October 14, 2014 email, defendant Huertas ordered the plaintiff not to contact OSHA with his concerns.
18. On information and belief, the order was issued to squelch facts that could embarrass defendant Huertas or prove politically problematic to his allies.
19. Department directive 2.42, issued about 22 months previous, established a standard operating procedure to enable internal investigation for critical injuries or death in the line of duty. It is based in part on model plans promulgated by the International Association of Fire Chiefs.
20. Directive 2.42 specifies, among other things, that a board of inquiry shall be formed to investigate such incidents. It also specifies that the Deputy Chief of Training "shall" be a member of the board.
21. On October 21, 2014, defendant Huertas appointed the plaintiff as Chair of the board of inquiry. The plaintiff immediately commenced gathering resources and individuals for the investigation.

22. At about that time, defendant Huertas specifically stated that he trusted the plaintiff to investigate the truth without the influence of politics. Defendant Huertas expressed similar faith in the plaintiff on October 23, 2014, and October 28, 2014.
23. On October 27, 2014, defendant Huertas requested that the plaintiff meet with a reporter about the investigation of the board of inquiry. The plaintiff did so. A story about the board of inquiry and related matters was published on October 30, 2014.
24. On October 31, 2014, defendant Huertas rebuked the plaintiff, claiming he gave out too much information. The plaintiff asked for specifics, but defendant Huertas did not identify any information as being inappropriate.
25. On information and belief, defendant Huertas so rebuked the plaintiff to squelch facts that could embarrass defendant Huertas or prove politically problematic to his allies.

Refused to Mislead the Department & Public

26. On November 3, 2014, the first meeting of the board of inquiry was held. During the meeting defendant Huertas ordered the board of inquiry to "stand down."
27. But defendant Huertas also ordered that members of the board should act like the investigation was going forward. Moreover, no member of the public was to know that the investigation by the board of inquiry had stopped. Defendant Huertas stated that he would know whether anyone in the room leaked this information as only those in the room were aware of it.
28. On November 4, 2014, the plaintiff informed defendant Huertas that he would not be involved with such a deception perpetrated upon the members of the department and the public.
29. On November 6, 2014, defendant Huertas sent the plaintiff an email indicating that the plaintiff was no longer the Chair of the board of inquiry. This role was assigned to defendant Martin.
30. No process was effected to remove the plaintiff as Chair beyond an email from defendant

Huertas.

31. Although the plaintiff remained a member of the board in name, in practice he was not. Meetings were held without informing him of them, and when roles in the investigation assigned, he was sidelined despite his position and expertise. Despite department directive 2.42, he is, de facto, not a member of the board of inquiry.
32. On April 10, 2015, defendant Martin, then Chair of the board of inquiry, informed the plaintiff that he was formally removed from the board because of his speech to the media; this formal removal punishing the plaintiff for his speech remained in effect until April 13, 2015.
33. On information and belief, the predominant motivation for removing the plaintiff as Chair, and from the board, was to squelch his speech and deter or hinder him from exposing facts that could be embarrassing to defendant Huertas or his allies.
34. On information and belief, defendant Martin was aware of the impermissible motivation behind defendant Huertas's actions yet agreed to help him effectuate the unlawful retaliation.
35. In early December, 2014, several articles and other items appeared in the media stiffly critical of defendant Huertas.
36. These articles cited electronic communications between the plaintiff and defendant Huertas where the plaintiff was critical of defendant Huertas. On information and belief, the media acquired copies of these communications through freedom of information act requests.
37. From November, 2014 through March, 2015, defendant Huertas used his administrative powers to harass the plaintiff in retaliation for his speech. Specifically, he:
 - a. withheld stand-by pay from the training division, which is under the plaintiff's supervision;
 - b. required prompt reports and records on matters that he normally would not

request;

- c. allowed vacancies in the training division to persist for an undue period of time;
- d. rescinded and refused to approve overtime, for both the plaintiff and members of his division, although he approved overtime to all the other support divisions.

38. On information and belief, the predominant motivation for this harassment was to punish the plaintiff for expressing a viewpoint critical of defendant Huertas and the leadership of the department.

Passed Over for Expressing Critical Views

39. In or about August 2014, the department posted a job opening for Assistant Fire Chief. The plaintiff applied for this position.
40. On December 31, 2014, the plaintiff was informed that he scored highest of all the candidates on the examination for the position.
41. On information and belief, his performance on the examination and in interviews, the plaintiff was the leading candidate.
42. On or about March 27, 2015, the plaintiff was notified that defendant Huertas had selected none of the finalists, and that the search would be opened to external candidates.
43. On information and belief, in retaliation for his speech critical of the department leadership, the plaintiff was denied the position.

Refusing to be Squelched on April 16, 2015

44. On April 9, 2015, defendant Huertas requested the plaintiff to attend a task force panel concerning the department on April 16, 2015.
45. Presenting at such a panel is not among the usual duties of the plaintiff; he had never presented to such a panel before.

46. On information and belief, on April 16, 2015, a number of members of the media attended specifically because the plaintiff was presenting at the panel; whereas usually there would be one or two individuals from the media present, in this case, there was about a dozen.
47. During the panel, the plaintiff was sharply critical of defendant Huertas and the department leadership.
48. Immediately after the panel, members of the media posed questions to defendant Huertas, who began to rebuff some of the comments made during the panel by the plaintiff, and defendant Huertas also began to speak about the training division, over which the plaintiff has supervision.
49. At about that time, plaintiff approached; members of the media instantly expressed an interest in hearing from the plaintiff.
50. At about that time, defendant Brady brusquely approached the plaintiff and told him in a rude and adversarial tone that he was dismissed.
51. The plaintiff refused and cited a good faith belief that defendant Brady was not in his chain of command.
52. Defendant Brady invaded the plaintiff's personal space in an aggressive manner, reiterating the order dismissing the plaintiff.
53. The plaintiff informed defendant Brady that he was addressing the safety of the department.
54. The plaintiff called out to defendant Huertas for clarification, but defendant Huertas ignored the plaintiff even though he heard him.
55. At about this time, another member of the department stepped between the men and made a remark to diffuse the situation, and defendant Brady backed away.
56. Although there were other members of the department present, defendant Brady did not

dismiss them. He singled out the plaintiff.

57. Defendant Huertas did not indicate to the plaintiff that he was needed at the firehouse or that they should report for duty right then.
58. The plaintiff then proceeded to answer questions posed to him by the media relating to the operation of the department. In answers to these questions, the plaintiff was sharply critical of the department leadership.
59. The incident was well-publicized in multiple media outlets. A number of stories focused on the disagreement between the plaintiff and defendant Huertas on the efficacy of the present leadership in the department.
60. The media coverage included an editorial on April 19, 2015, explicitly calling for defendant Huertas to leave the department.

Punished for Expressing a Viewpoint Critical of Department Leadership

61. On April 21, 2015, the plaintiff was placed on paid administrative leave pending an investigation and not allowed to visit any department facility during that leave. This administrative leave lasted until July 28, 2015.
62. On information and belief, other members of the department were forbidden from speaking with the plaintiff during this time.
63. The plaintiff was subjected to an investigation into April 16, 2015, which was inappropriate, and a denigrating process.
64. The sham charges against the plaintiff were (1) disobedience of orders or disregard of officers under department rule 25, and with (2) absence from duty under department rule 46.
65. On July 28, 2015, the plaintiff was suspended without pay until August 26, 2015 for these sham charges.

66. Although other members of the department were present after the April 16, 2015 meeting, only the plaintiff was charged with violations of any rules.
67. The investigation, the charges, and the suspension were shams levied as a pretext for invidious viewpoint discrimination against the plaintiff to punish his expression of a viewpoint critical of department leadership.

CLAIMS OF LAW

Federal Claims for Deprivation of First Amendment Rights

Count 1: § 1983 Claim for Deprivation of First Amendment Rights Against Defendant Huertas in his Individual Capacity

68. Paragraphs 1–3 and 14–67 are incorporated by reference.
69. These acts by defendant Huertas, which were made under color of law, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

Count 2: § 1983 Claim for Deprivation of First Amendment Rights Against Defendant Brady in his Individual Capacity

70. Paragraphs 1–3 and 14–67 are incorporated by reference.
71. These acts by defendant Brady, which were made under color of law, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

Count 3: § 1983 Claim for Deprivation of First Amendment Rights Against Defendant Martin in his Individual Capacity

72. Paragraphs 1–3 and 14–67 are incorporated by reference.
73. These acts by defendant Martin, which were made under color of law, repeatedly deprived

the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

**Count 4: § 1983 Claim for Deprivation of First Amendment Rights
*Monell Claim Against Defendant Huertas in his Official Capacity***

74. Paragraphs 1–3 and 14–67 are incorporated by reference.
75. These acts were made under color of law, repeatedly depriving the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
76. These acts were the direct and proximate result of deliberate indifference by defendant Huertas as to the first amendment rights of others.
77. These acts were the direct and proximate result of decisions and conduct by the final policymaker of the department, defendant Huertas.

**Count 5: § 1983 Claim for Deprivation of First Amendment Rights
*Monell Claim Against Defendants Brady, Martin, Segarra, in their Official Capacities, and against the city and the department***

78. Paragraphs 1–3 and 14–67 are incorporated by reference.
79. These acts were made under color of law, repeatedly depriving the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
80. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department, including defendant Brady, as to the first amendment rights of others.
81. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department, including defendant Martin, as to the first amendment rights of others.
82. These acts were the direct and proximate result of decisions and conduct by final

policymakers for the department, including defendant Brady.

83. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, including defendant Martin.

Count 6: § 1983 Claim for Conspiracy to Deprive First Amendment Rights Against Defendant Huertas in his Individual Capacity

84. Paragraphs 1–3 and 14–67 are incorporated by reference.

85. These acts were made under color of law, repeatedly depriving the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

86. On information and belief, defendant Huertas acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

87. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

Count 7: § 1983 Claim for Conspiracy to Deprive First Amendment Rights Against Defendant Brady in his Individual Capacity

88. Paragraphs 1–3 and 14–67 are incorporated by reference.

89. These acts were made under color of law, repeatedly depriving the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

90. On information and belief, defendant Brady acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

91. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff

of these rights.

**Count 8: § 1983 Claim for Conspiracy to Deprive First Amendment Rights
Against Defendant Martin in his Individual Capacity**

92. Paragraphs 1–3 and 14–67 are incorporated by reference.
93. These acts were made under color of law, repeatedly depriving the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
94. On information and belief, defendant Martin acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
95. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 9: § 1983 Claim for Conspiracy to Deprive First Amendment Rights
Monell Claim Against Defendant Huertas in his Official Capacity**

96. Paragraphs 1–3 and 14–67 are incorporated by reference.
97. These acts were made under color of law, repeatedly depriving the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
98. These acts were the direct and proximate result of deliberate indifference by defendant Huertas as to the first amendment rights of others.
99. These acts were the direct and proximate result of decisions and conduct by the final policymaker of the department, defendant Huertas.
100. On information and belief, defendant Huertas acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

101. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

Count 10: § 1983 Claim for Deprivation of First Amendment Rights
Monell Claim Against Defendants Brady, Martin, Segarra, in their Official Capacities, and against the city and the department

102. Paragraphs 1–3 and 14–67 are incorporated by reference.

103. These acts were made under color of law, repeatedly depriving the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

104. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department, including defendant Brady, as to the first amendment rights of others.

105. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department, including defendant Martin, as to the first amendment rights of others.

106. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Brady.

107. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Martin.

108. On information and belief, defendant Brady acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

109. On information and belief, defendant Martin acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

110. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

State Statutory Claims for Deprivation of First Amendment Rights

**Count 11: General Statutes § 31-51q Claim
For Deprivation of First Amendment Rights
Against Defendant Huertas in his Individual Capacity**

111. Paragraphs 1-3 and 14-67 are incorporated by reference.

112. These acts, which were made by the plaintiff's employer through defendant Huertas, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

**Count 12: General Statutes § 31-51q Claim
For Deprivation of First Amendment Rights
Against Defendant Brady in his Individual Capacity**

113. Paragraphs 1-3 and 14-67 are incorporated by reference.

114. These acts, which were made by the plaintiff's employer through defendant Brady, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

**Count 13: General Statutes § 31-51q Claim
For Deprivation of First Amendment Rights
Against Defendant Martin in his Individual Capacity**

115. Paragraphs 1-3 and 14-67 are incorporated by reference.

116. These acts, which were made by the plaintiff's employer through defendant Martin, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first

amendment to the United States constitution.

**Count 14: General Statutes § 31-51q Claim
For Deprivation of First Amendment Rights
Against Defendant Huertas in his Official Capacity**

117. Paragraphs 1–3 and 14–67 are incorporated by reference.
118. These acts, which were made by the plaintiff's employer through defendant Huertas, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
119. These acts were the direct and proximate result of deliberate indifference by defendant Huertas as to the first amendment rights of others.
120. These acts were the direct and proximate result of decisions and conduct by the final policymaker of the department, defendant Huertas.

**Count 15: General Statutes § 31-51q Claim
For Deprivation of First Amendment Rights
Claim Against Defendants Brady, Martin, Segarra, in their
Official Capacities, and against the city and the department**

121. Paragraphs 1–3 and 14–67 are incorporated by reference.
122. These acts, which were made by the plaintiff's employer through its officials, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
123. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department, including defendant Brady, as to the first amendment rights of others.
124. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department, including defendant Martin, as to the first amendment

rights of others.

125. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, including defendant Brady.
126. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, including defendant Martin.

**Count 16: Conspiracy to Deprive First Amendment Rights Protected by
General Statutes § 31-51q
Against Defendant Huertas in his Individual Capacity**

127. Paragraphs 1–3 and 14–67 are incorporated by reference.
128. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
129. On information and belief, defendant Huertas acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
130. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 17: Conspiracy to Deprive First Amendment Rights Protected by
General Statutes § 31-51q
Against Defendant Brady in his Individual Capacity**

131. Paragraphs 1–3 and 14–67 are incorporated by reference.
132. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.

133. On information and belief, defendant Brady acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
134. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 18: Conspiracy to Deprive First Amendment Rights Protected by
General Statutes § 31-51q
Against Defendant Martin in his Individual Capacity**

135. Paragraphs 1–3 and 14–67 are incorporated by reference.
136. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
137. On information and belief, defendant Martin acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
138. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 19: Conspiracy to Deprive First Amendment Rights Protected by
General Statutes § 31-51q
Against Defendant Huertas in his Official Capacity**

139. Paragraphs 1–3 and 14–67 are incorporated by reference.
140. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United

States constitution.

141. These acts were the direct and proximate result of deliberate indifference by defendant Huertas as to the first amendment rights of others.
142. These acts were the direct and proximate result of decisions and conduct by the final policymaker of the department, defendant Huertas.
143. On information and belief, defendant Huertas acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
144. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

Count 20: Conspiracy to Deprive First Amendment Rights Protected by General Statutes § 31-51q Against Defendants Brady, Martin, Segarra, in their Official Capacities, and against the city and the department

145. Paragraphs 1–3 and 14–67 are incorporated by reference.
146. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
147. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department as to the first amendment rights of others.
148. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Brady.
149. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Martin.

150. On information and belief, defendant Brady acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
151. On information and belief, defendant Martin acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
152. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

State Statutory Claims for Deprivation of State Constitution Speech and Press Rights

**Count 31: General Statutes § 31-51q Claim For Deprivation of Rights
Guaranteed by Article the First, §§ 4, 5, 14 of the State Constitution
Against Defendant Huertas in his Individual Capacity**

153. Paragraphs 1–3 and 14–67 are incorporated by reference.
154. These acts, which were by the plaintiff's employer through defendant Huertas, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the first, §§ 4, 5, and 14 of the Connecticut constitution.

**Count 32: General Statutes § 31-51q Claim For Deprivation of Rights
Guaranteed by Article the First, §§ 4, 5, 14 of the State Constitution
Against Defendant Brady in his Individual Capacity**

155. Paragraphs 1–3 and 14–67 are incorporated by reference.
156. These acts, which were made by the plaintiff's employer through defendant Brady, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the

first, §§ 4, 5, and 14 of the Connecticut constitution.

**Count 33: General Statutes § 31-51q Claim For Deprivation of Rights
Guaranteed by Article the First, §§ 4, 5, 14 of the State Constitution
Against Defendant Martin in his Individual Capacity**

157. Paragraphs 1–3 and 14–67 are incorporated by reference.
158. These acts, which were made by the plaintiff's employer through defendant Martin, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the first, §§ 4, 5, and 14 of the Connecticut constitution.

**Count 34: General Statutes § 31-51q Claim For Deprivation of Rights
Guaranteed by Article the First, §§ 4, 5, 14 of the State Constitution
Against Defendant Huertas in his Official Capacity**

159. Paragraphs 1–3 and 14–67 are incorporated by reference.
160. These acts, which were made by the plaintiff's employer through defendant Huertas, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the first, §§ 4, 5, and 14 of the Connecticut constitution.
161. These acts were the direct and proximate result of deliberate indifference by defendant Huertas as to the first amendment rights of others.
162. These acts were the direct and proximate result of decisions and conduct by the final policymaker of the department, defendant Huertas.

**Count 35: General Statutes § 31-51q Claim For Deprivation of Rights
Guaranteed by Article the First, §§ 4, 5, 14 of the State Constitution
Claim Against Defendants Brady, Martin, Segarra, in their
Official Capacities, and against the city and the department**

163. Paragraphs 1-3 and 14-67 are incorporated by reference.
164. These acts, which were made by the plaintiff's employer through its officials, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the first, §§ 4, 5, and 14 of the Connecticut constitution.
165. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department as to the first amendment rights of others.
166. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, defendants Brady and Martin.

**Count 36: Conspiracy For Deprivation of Rights Guaranteed by Article the First,
 §§ 4, 5, 14 of the State Constitution and General Statutes § 31-51q
 Against Defendant Huertas in his Individual Capacity**

167. Paragraphs 1-3 and 14-67 are incorporated by reference.
168. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the first, §§ 4, 5, and 14 of the Connecticut constitution.
169. On information and belief, defendant Huertas acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
170. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 37: Conspiracy For Deprivation of Rights Guaranteed by Article the First,
 §§ 4, 5, 14 of the State Constitution and General Statutes § 31-51q
 Against Defendant Brady in his Individual Capacity**

171. Paragraphs 1-3 and 14-67 are incorporated by reference.
172. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the first, §§ 4, 5, and 14 of the Connecticut constitution.
173. On information and belief, defendant Brady acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
174. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 38: Conspiracy For Deprivation of Rights Guaranteed by Article the First,
 §§ 4, 5, 14 of the State Constitution and General Statutes § 31-51q
 Against Defendant Martin in his Individual Capacity**

175. Paragraphs 1-3 and 14-67 are incorporated by reference.
176. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the first, §§ 4, 5, and 14 of the Connecticut constitution.
177. On information and belief, defendant Martin acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
178. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 39: Conspiracy For Deprivation of Rights Guaranteed by Article the First,
§§ 4, 5, 14 of the State Constitution and General Statutes § 31-51q
Against Defendant Huertas in his Official Capacity**

179. Paragraphs 1-3 and 14-67 are incorporated by reference.
180. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the first, §§ 4, 5, and 14 of the Connecticut constitution.
181. These acts were the direct and proximate result of deliberate indifference by defendant Huertas as to the first amendment rights of others.
182. These acts were the direct and proximate result of decisions and conduct by the final policymaker of the department, defendant Huertas.
183. On information and belief, defendant Huertas acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
184. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 40: Conspiracy For Deprivation of Rights Guaranteed by Article the First,
§§ 4, 5, 14 of the State Constitution and General Statutes § 31-51q
Against Defendants Brady, Martin, Segarra, in their
Official Capacities, and against the city and the department**

185. Paragraphs 1-3 and 14-67 are incorporated by reference.
186. These acts, which were made through the plaintiff's employer, repeatedly deprived the plaintiff of the liberty of speech and of the press, and to apply for redress of grievances or other proper purposes by remonstrance, under article the first, §§ 4, 5, and 14 of the

Connecticut constitution.

187. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department as to the first amendment rights of others.
188. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Brady.
189. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Martin.
190. On information and belief, defendant Brady acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
191. On information and belief, defendant Martin acted in combination with one or more other persons to unlawfully so deprive the plaintiff of the liberty of speech and of the press under the first amendment to the United States constitution.
192. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

Federal Claims for Deprivation of Due Process

Count 41: § 1983 Claim for Deprivation of Due Process Against Defendant Huertas in his Individual Capacity

193. Paragraphs 1–3 and 14–67 are incorporated by reference.
194. These acts by defendant Huertas, which were made under color of law, repeatedly deprived the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.

Count 42: § 1983 Claim for Deprivation of Due Process

Against Defendant Brady in his Individual Capacity

195. Paragraphs 1–3 and 14–67 are incorporated by reference.
196. These acts by defendant Brady, which were made under color of law, repeatedly deprived the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.

**Count 43: § 1983 Claim for Deprivation of Due Process
Against Defendant Martin in his Individual Capacity**

197. Paragraphs 1–3 and 14–67 are incorporated by reference.
198. These acts by defendant Martin, which were made under color of law, repeatedly deprived the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.

**Count 44: § 1983 Claim for Deprivation of Due Process
Monell Claim Against Defendant Huertas in his Official Capacity**

199. Paragraphs 1–3 and 14–67 are incorporated by reference.
200. These acts by defendant Huertas, which were made under color of law, repeatedly deprived the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
201. These acts were the direct and proximate result of deliberate indifference by defendant Huertas as to the due process rights of others.
202. These acts were the direct and proximate result of decisions and conduct by the final policymaker of the department, defendant Huertas.

**Count 45: § 1983 Claim for Deprivation of Due Process
Monell Claim Against Defendants Brady, Martin, Segarra, in their
Official Capacities, and against the city and the department**

203. Paragraphs 1–3 and 14–67 are incorporated by reference.
204. These acts, which were made under color of law, repeatedly deprived the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
205. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department, including defendant Brady, as to the due process rights of others.
206. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department, including defendant Martin, as to the due process rights of others.
207. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Brady.
208. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Martin.

**Count 46: § 1983 Claim for Conspiracy to Deprive Due Process
Against Defendant Huertas in his Individual Capacity**

209. Paragraphs 1–3 and 14–67 are incorporated by reference.
210. These acts were made under color of law, repeatedly depriving the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
211. On information and belief, defendant Huertas acted in combination with one or more other persons to unlawfully so deprive the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
212. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 47: § 1983 Claim for Conspiracy to Deprive Due Process
Against Defendant Brady in his Individual Capacity**

213. Paragraphs 1–3 and 14–67 are incorporated by reference.
214. These acts were made under color of law, repeatedly depriving the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
215. On information and belief, defendant Brady acted in combination with one or more other persons to unlawfully so deprive the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
216. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 48: § 1983 Claim for Conspiracy to Deprive Due Process
Against Defendant Martin in his Individual Capacity**

217. Paragraphs 1–3 and 14–67 are incorporated by reference.
218. These acts were made under color of law, repeatedly depriving the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
219. On information and belief, defendant Martin acted in combination with one or more other persons to unlawfully so deprive the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
220. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 49: § 1983 Claim for Conspiracy to Deprive Due Process
Monell Claim Against Defendant Huertas in his Official Capacity**

221. Paragraphs 1–3 and 14–67 are incorporated by reference.
222. These acts were made under color of law, repeatedly depriving the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
223. These acts were the direct and proximate result of deliberate indifference by defendant Huertas as to the due process rights of others.
224. These acts were the direct and proximate result of decisions and conduct by the final policymaker of the department, defendant Huertas.
225. On information and belief, defendant Huertas acted in combination with one or more other persons to unlawfully so deprive the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
226. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

**Count 50: § 1983 Claim for Conspiracy to Deprive of Due Process
*Monell Claim Against Defendants Brady, Martin, Segarra, in their Official Capacities, and against the city and the department***

227. Paragraphs 1–3 and 14–67 are incorporated by reference.
228. These acts were made under color of law, repeatedly depriving the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
229. These acts were the direct and proximate result of deliberate indifference amongst the leadership of the department as to the due process rights of others.
230. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Brady.

231. These acts were the direct and proximate result of decisions and conduct by final policymakers for the department, which includes defendant Martin.
232. On information and belief, defendant Brady acted in combination with one or more other persons to unlawfully so deprive the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
233. On information and belief, defendant Martin acted in combination with one or more other persons to unlawfully so deprive the plaintiff of due process guaranteed by the fourteenth amendment to the United States constitution.
234. These facts constituted one or more acts done by one or more of these conspirators in furtherance of depriving the plaintiff these rights, which resulted in depriving the plaintiff of these rights.

State Claims for Deprivation of Due Process (Seeking Only Equitable Relief)

Count 51: Deprivation of Due Process Guaranteed by Article the First, §§ 8, 9, 10 of The Connecticut Constitution, for Equitable Relief Only, Against Defendant Huertas in his Individual Capacity

235. Paragraphs 1–3 and 14–67 are incorporated by reference.
236. These acts by defendant Huertas repeatedly deprived the plaintiff of due process guaranteed by article the first, §§ 8, 9, and 10 of the Connecticut constitution.

Count 52: Deprivation of Due Process Guaranteed by Article the First, §§ 8, 9, 10 of The Connecticut Constitution, for Equitable Relief Only, Against Defendant Brady in his Individual Capacity

237. Paragraphs 1–3 and 14–67 are incorporated by reference.
238. These acts by defendant Brady repeatedly deprived the plaintiff of due process guaranteed by article the first, §§ 8, 9, and 10 of the Connecticut constitution.

Count 53: Deprivation of Due Process Guaranteed by Article the First, §§ 8, 9, 10 of The Connecticut Constitution, for Equitable Relief Only, Against Defendant Martin in his Individual Capacity

239. Paragraphs 1–3 and 14–67 are incorporated by reference.
240. These acts by defendant Martin repeatedly deprived the plaintiff of due process guaranteed by article the first, §§ 8, 9, and 10 of the Connecticut constitution.

Count 54: Deprivation of Due Process Guaranteed by Article the First, §§ 8, 9, 10 of The Connecticut Constitution, for Equitable Relief Only, Against Defendant Huertas in his Official Capacity

241. Paragraphs 1–3 and 14–67 are incorporated by reference.
242. These acts by defendant Huertas repeatedly deprived the plaintiff of due process guaranteed by article the first, §§ 8, 9, and 10 of the Connecticut constitution.

Count 55: Deprivation of Due Process Guaranteed by Article the First, §§ 8, 9, 10 of The Connecticut Constitution, for Equitable Relief Only, Against Defendants Brady, Martin, Segarra, in their Official Capacities, and against the city and the department

243. Paragraphs 1–3 and 14–67 are incorporated by reference.
244. These acts repeatedly deprived the plaintiff of due process guaranteed by article the first, §§ 8, 9, and 10 of the Connecticut constitution.

Abuse of Process

Count 56: Abuse of Process Against Defendant Huertas in his Individual Capacity

245. Paragraphs 1–3 and 14–67 are incorporated by reference.
246. By these acts, defendant Huertas used his powers over process against the plaintiff in an

improper manner and to accomplish a purpose for which the administrative process and oversight of employment was not designed.

Count 57: Civil Conspiracy for Abuse of Process Against Defendant Huertas in his Individual Capacity

247. Paragraphs 1–3 and 14–67 are incorporated by reference.
248. By these acts, powers over process were used against the plaintiff in an improper manner and to accomplish a purpose for which the administrative process and oversight of employment was not designed, constituting an abuse of process.
249. On information and belief, defendant Huertas acted in combination with one or more other persons to effect this abuse of process.
250. These facts constituted one or more acts done by one or more of these conspirators in furtherance of this abuse of process.

Count 58: Abuse of Process Against Defendant Brady in his Individual Capacity

251. Paragraphs 1–3 and 14–67 are incorporated by reference.
252. By these acts, defendant Brady used his powers over process against the plaintiff in an improper manner and to accomplish a purpose for which the administrative process and oversight of employment was not designed.

Count 59: Civil Conspiracy for Abuse of Process Against Defendant Brady in his Individual Capacity

253. Paragraphs 1–3 and 14–67 are incorporated by reference.
254. By these acts, powers over process were used against the plaintiff in an improper manner and to accomplish a purpose for which the administrative process and oversight of employment was not designed.

255. On information and belief, defendant Brady acted in combination with one or more other persons to effect this abuse of process.
256. These facts constituted one or more acts done by one or more of these conspirators in furtherance of this abuse of process.

Count 60: Abuse of Process Against Defendant Martin in his Individual Capacity

257. Paragraphs 1–3 and 14–67 are incorporated by reference.
258. By these acts, defendant Martin used his powers over process against the plaintiff in an improper manner and to accomplish a purpose for which the administrative process and oversight of employment was not designed.

Count 61: Civil Conspiracy for Abuse of Process Against Defendant Martin in his Individual Capacity

259. Paragraphs 1–3 and 14–67 are incorporated by reference.
260. By these acts, powers over process were used against the plaintiff in an improper manner and to accomplish a purpose for which the administrative process and oversight of employment was not designed.
261. On information and belief, defendant Martin acted in combination with one or more other persons to effect this abuse of process.
262. These facts constituted one or more acts done by one or more of these conspirators in furtherance of this abuse of process.

Intentional Infliction of Emotional Distress

**Count 62: Intentional Infliction of Emotional Distress
Against Defendant Huertas in his Individual Capacity**

263. Paragraphs 1–3 and 14–67 are incorporated by reference.

264. Through these acts, defendant Huertas intended to inflict emotional distress on the plaintiff, or he knew or should have known that emotional distress was likely result of his conduct.
265. This conduct was extreme and outrageous under contemporary community standards.
266. Defendant Huertas's conduct caused the plaintiff's severe emotional distress.

Count 63: Civil Conspiracy for Intentional Infliction of Emotional Distress Against Defendant Huertas in his Individual Capacity

267. Paragraphs 1–3 and 14–67 are incorporated by reference.
268. On information and belief, defendant Huertas acted in combination with one or more other persons to effect this infliction of emotional distress.
269. These acts were intended to inflict emotional distress on the plaintiff, or the conspirators knew or should have known that emotional distress was likely result of the conduct.
270. This conduct was extreme and outrageous under contemporary community standards.
271. This conduct caused the plaintiff's severe emotional distress.
272. These facts constituted one or more acts done by one or more of these conspirators in furtherance of this infliction of emotional distress.

Count 64: Intentional Infliction of Emotional Distress Against Defendant Brady in his Individual Capacity

273. Paragraphs 1–3 and 14–67 are incorporated by reference.
274. Through these acts, defendant Brady intended to inflict emotional distress on the plaintiff, or he knew or should have known that emotional distress was likely result of

his conduct.

275. This conduct was extreme and outrageous under contemporary community standards.

276. Defendant Brady's conduct caused the plaintiff's severe emotional distress.

Count 65: Civil Conspiracy for Intentional Infliction of Emotional Distress Against Defendant Brady in his Individual Capacity

277. Paragraphs 1-3 and 14-67 are incorporated by reference.

278. On information and belief, defendant Brady acted in combination with one or more other persons to effect this infliction of emotional distress.

279. These acts were intended to inflict emotional distress on the plaintiff, or the conspirators knew or should have known that emotional distress was likely result of the conduct.

280. This conduct was extreme and outrageous under contemporary community standards.

281. This conduct caused the plaintiff's severe emotional distress.

282. These facts constituted one or more acts done by one or more of these conspirators in furtherance of this infliction of emotional distress.

Count 66: Intentional Infliction of Emotional Distress Against Defendant Martin in his Individual Capacity

283. Paragraphs 1-3 and 14-67 are incorporated by reference.

284. Through these acts, defendant Martin intended to inflict emotional distress on the plaintiff, or he knew or should have known that emotional distress was likely result of his conduct.

285. This conduct was extreme and outrageous under contemporary community standards.

286. Defendant Martin's conduct caused the plaintiff's severe emotional distress.

Count 67: Civil Conspiracy for Intentional Infliction of Emotional Distress Against Defendant Martin in his Individual Capacity

287. Paragraphs 1–3 and 14–67 are incorporated by reference.

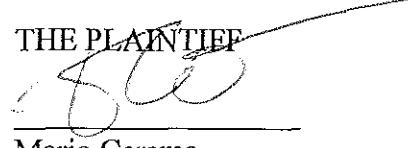
288. On information and belief, defendant Martin acted in combination with one or more other persons to effect this infliction of emotional distress.

289. These acts were intended to inflict emotional distress on the plaintiff, or the conspirators knew or should have known that emotional distress was likely result of the conduct.

290. This conduct was extreme and outrageous under contemporary community standards.

291. This conduct caused the plaintiff's severe emotional distress.

292. These facts constituted one or more acts done by one or more of these conspirators in furtherance of this infliction of emotional distress.

BY: 

Mario Cerame

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His Attorneys

RETURN DATE: SEPTEMBER 15, 2015 : SUPERIOR COURT
DANIEL NOLAN : JUDICIAL DISTRICT OF HARTFORD
v. : AT HARTFORD
CARLOS HUERTAS ET AL : AUGUST 3, 2015

PRAYER FOR RELIEF

The plaintiff claims equitable and declaratory relief, compensatory damages, punitive damages, and reasonable attorneys' fees.

BY: 
THE PLAINTIFF
Mario Cerame

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RETURN DATE: SEPTEMBER 15, 2015 : SUPERIOR COURT
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v. : AT HARTFORD
CARLOS HUERTAS ET AL : AUGUST 3, 2015

STATEMENT OF AMOUNT IN DEMAND

The plaintiff in this matter seeks more than \$15,000.00 in damages, excluding interest and costs.

BY:

THE PLAINTIFF

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