

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ALEXANDER J. WILLIAMS.,	§	
individually and as next friend of XW,	§	
minor; Plaintiffs,	§	
	§	
vs.	§	CASE NO.: 4:23-CV-00302
	§	
CHRISTOPHER W. BOLIN, DANIEL	§	JURY TRIAL DEMANDED
KERRIGAN; ANTHONY B.	§	
MACIAS, HARRIS COUNTY,	§	
TEXAS; SHERIFF ED GONZALEZ,	§	
Defendants.	§	
	§	

SECOND AMENDED COMPLAINT¹

TO THE HONORABLE JUDGE LEE ROSENTHAL

Plaintiff, ALEXANDER WILLIAMS individually, and as the parent and next friend of minor X.W. brings this lawsuit under 42 U.S.C § 1983 and raising supplemental state-law claims concerning the actions of defendants: Deputy CHRISTOPHER W. BOLIN, Deputy DANIEL J. KERRIGAN, and Deputy ANTHONY B. MACIAS, JOHN DOE, HARRIS COUNTY, TEXAS, and SHERIFF ED GONZALEZ in unlawfully arresting, maliciously prosecuting, and using excessive and unreasonable force against plaintiffs ALEXANDER WILLIAMS and minor XW. The actions and conduct of the defendants deputies are the result of

¹ Plaintiffs are not proposing to reinstate claims dismissed with prejudice from The live Complaint, first Amended Complaints The dismissed claims are restated herein to assure they are not waived for appellant purposes.

a policy, practice, custom, and deliberate indifference on the part of the defendant, Harris County Sheriff's Office.

INTRODUCTION

1. Plaintiff, ALEXANDER J. WILLIAMS, individually, and as the next friend to minor XW, brings this civil action for compensatory damages against Defendants CHRISTOPHER W. BOLIN, KERRIGAN, MACIAS, SUPERVISOR JOHN DOE, HARRIS COUNTY, and SHERIFF ED GONZALEZ in their official capacities, and punitive damages against said Defendants for violating the plaintiffs' civil rights under the Fourth and Fourteenth Amendments denying equal protection under the laws of the United States Constitution.

JURISDICTION

2. This Court has federal jurisdiction pursuant to 28 U.S.C. 1331 (federal question), 1343 (civil rights), 42 U.S.C. 1983 and 1988, and the Fourth, Eighth, and Fourteenth Amendments to the United States Constitution. This Court has supplemental jurisdiction pursuant to 28 U.S.C. 1367(a).

VENUE

3. Venue is proper in this Court because the incidents at issue took place in Harris County, Texas, within the United States Southern District of Texas. This suit arises from the unreasonable search and seizure, and excessive force inflicted by the Harris County Sheriff's Office.

PARTIES

4. Plaintiff, ALEX WILLIAMS, is above the age of nineteen, and at all times relevant to this Complaint was a resident of Harris County, Texas. He is the father of and legal guardian for his son, XW.

5. Plaintiff, X.W. is a minor and at all times relevant to this complaint was a resident of Harris County, Texas.

6. Defendant, DEPUTY CHRISTOPHER W. BOLIN at all relevant times was acting under color of law and as the agent, and, as a matter of law, the official representative of the Harris County Sheriff's Office as a deputy. He is sued in his official capacity for punitive and compensatory damages. He can be served at the Harris County Sheriff's Office - 1200 Baker Street, Houston, Texas 77002 or wherever he may be found.

7. Defendant, DEPUTY DANIEL KERRIGAN, at all relevant times was acting under color of law and as the agent, and, as a matter of law, the official representative of the Harris County Sheriff's Office as a Senior Deputy. He is sued in his official capacity for punitive and compensatory damages. He can be served at the Harris County Sheriff's Office - 1200 Baker Street, Houston, Texas 77002 or wherever he may be found.

8. Defendant, DEPUTY ANTHONY B. MACIAS at all relevant times was acting under color of law and as the agent, and, as a matter of law, the official

representative of the Harris County Sheriff's Office as a Deputy 1. He is sued in his official capacity for punitive and compensatory damages. He can be served at the Harris County Sheriff's Office - 1200 Baker Street, Houston, Texas 77002 or wherever he may be found.

9. Defendant, SUPERVISOR JOHN DOE, at all relevant times was acting under color of law and as the agent, and, as a matter of law, the official representative of the Harris County Sheriff's Office as the Harris County Sheriff's Office District 4 Crime Reduction Unit supervisor. He is sued in his official capacity for punitive and compensatory damages. He can be served at the Harris County Sheriff's Office - 1200 Baker Street, Houston, Texas 77002 or wherever he may be found.

10. Defendant, SHERIFF ED GONZALEZ is an individual who may be served with a citation at his place of employment, Harris County Sheriff's Office or wherever he may be found. Sheriff Gonzalez is being sued in his individual capacity and official capacity at all times relevant to this case acted under the color of law.

11. Defendant, HARRIS COUNTY, is a municipality in Texas. Harris County is a "person" under 42 U.S.C. § 1983 and at all times relevant to this case, acted under the color of law. Harris County may be served with citation through the Harris County Judge or wherever he may be found.

12. SEAN JEFFREY VALENZUEL POWERS, is an individual who may be served with a citation at his place of employment, Harris County District Attorney's Office

or wherever he may be found. Powers is being sued in his individual capacity and official capacity at all times relevant to this case acted under the color of law. He accepted charges for interference with public duties against Mr. Williams based on the representations made by officers but failed to investigate whether the facts presented were sufficient to support an arrest.

FACTS

13. On the afternoon of Tuesday, May 10, 2022, Mr. Alexander Williams picked up his three-year-old son, X.W. from daycare, and as a reward to his son for a good day at school, Mr. Williams stopped by the Pick-Quick Mini Market located at 5820 Hwy 6 North in Houston, Texas.

14. Upon pulling into the strip center, Mr. Williams noticed 3 patrol units and several officers doing something in the far corner of the strip center. Having no bearing on him or his son, the two parked and entered the store. This was not a traffic stop involving Mr. Williams.

15. While at the counter purchasing candy and two canned sodas, Mr. Williams noticed the patrol units had pulled in front of the store.

16. After observing the officers and waiting a few minutes for them to leave, the store clerk rang Alex's items up and he paid.

17. Once Alex returned to the parking lot, Mr. Williams noticed that his car was blocked in by the patrol units, especially the last patrol SUV driven by Deputy Kerrigan.

18. With his son's safety as his primary concern, Mr. Williams put the toddler in the car and proceeded to politely ask Deputy Kerrigan if he could move so the two could be on their way home.

19. In a disrespectful manner, Kerrigan emphatically responded, "are you going to get that truck registered?" To which Mr. Williams replied, "yes sir". This calm response apparently diffused the situation, and Kerrigan began to move his truck allowing Mr. Williams and XW to attempt to leave peacefully.

20. As Mr. Williams returned to his car and son, Deputy Bolin stormed around his patrol vehicle towards Mr. Williams. Bolin loudly berating him demanding an explanation on what he was doing at this store, why he was there, and he show his driver's license, although there was no basis, Mr. Williams was at all times on private property, was not driving, or committing a crime at the time of the encounter with deputies.

21. Admittedly, Bolin overreacted to Mr. Williams' poor parking skills on the private property. His unregistered vehicle was not completely in its space, and was

slightly over the line separating one space from the space next to the handicapped parking spot².


22. Bolin alleged his mistake was due to believing that Mr. Williams was another Black man who Bolin had just confronted in the same parking lot in the past. Bolin's mistake of fact would have been equally as unconstitutional toward any Black man or any person.

23. Instead of keeping quiet, Mr. Williams assertively responded that he was trying to leave, while began engaging in protected activity, speech, informing Bolin that he was not a criminal just because he was at this store. Williams would not have been arrested had he not exercised his First Amendment right and remained quiet, although the activity is protected.

24. In the process Mr. Williams correctly provided Bolin his full name, driver's license number, and address; even though there was no crime he was accused of committing to support a detention and his required identification. Williams was on private property. The transportation code relating to moving violations does not apply when on private property. Nonetheless, Bolin grabbed Mr. Williams by the

²[T]he citation for no vehicle registration was a fine-only traffic offense that would not have resulted in petitioner's pretrial incarceration. See Tex. Transp. Code §§ 502.471, 502.473 (West 2011). *Greer v. Davis*, 2016 U.S. Dist. LEXIS 153010, see also, 'The Infiniti also had expired temporary tags. Trans. 10:18:44-10:18:55. In Texas, operating a vehicle without valid registration is a traffic offense. Tex. Transp. Code Ann. § 502.472. Officer Sotuyo testified that both traffic infractions were "arrestable offenses." Trans. 10:18:56-10:18:59. After an exhaustive search, the court has not found any statutory or caselaw stating that these everyday traffic violations are arrestable offenses. To the contrary, where the Texas Transportation Code does not provide for "another penalty," a person convicted of a traffic offense "shall be punished by a fine not less than \$1 or more than \$200." Tex. Transp. Code Ann. § 542.401. Section 545.104 does not provide for "another penalty," see § 545.104, and the \$200 maximum also generally applies to operators who drive with expired registration. See id. § 502.471. *United States v. Grigsby*, 2022 U.S. Dist. LEXIS 70837,

wrist, slammed him against the back of Mr. Williams's car, and said he was being detained.

25.  Williams was being detained for no reason whatsoever. His detention was unlawful since a parking violation on private property as Mr. Williams on the date in question. Parking violations do not rise to the level of even a traffic violation. It is unlawful to park in a handicapped spot but it is not an arrestable offense since it would have been a first offense for Ms. Williams but it exposes a person to misdemeanor charges only after multiple violations occur.³

26. Having dealt with unreasonable officers in the past, Mr. Williams did not resist arrest, but promptly informed the deputies that his three year old son was in the back seat of his truck parked in front of the convenience store. He further advised that a loved one needed to be called to pick his three-year-old up from the store.

27. Bolin ignored him and unfoundedly said, "stop pushing off the truck," as though he were attempting to paint a false visual narrative based on his proclamations since Mr. Williams was not pushing off the truck. Bolin then threw Mr. Williams to the ground while in handcuffs.

³ (j) A person commits an offense if the person: (1) stands a vehicle on which are displayed license plates issued under Section 504.201 or 504.202(b-1) or a disabled parking placard in a parking space or area for which this chapter creates an exemption from payment of a fee or penalty imposed by a governmental unit; (2) does not have a disability; (3) is not transporting a person with disability; and (4) does not pay any applicable fee related to standing in the space or area imposed by a governmental unit or exceeds a limitation on the length of time for standing in the space or area.

28. At this time Kerrigan exited his patrol car, and both began to physically assault Mr. Williams while he was on the ground in handcuffs.

29. Macias stood by and allowed the other defendants to illegally seize Mr. Williams and threaten to take his son and deliver XW to CPS. Further, at various points in body-worn camera footage, Officers Kerrigan and Macias taunt Mr. Williams about being separated from his 3-year-old son who was crying in the parked truck alone, waiting for his father to return, while witnessing the horrific attack against his father. An image that will be forever embedded in his memory. Macias's body worn cam shows Macias sucker punching Mr. Williams while he was handcuffed the back of a patrol vehicle.

30. Kerrigan put Mr. Williams in the patrol car and punched him with a closed fist multiple times, while Bolin simultaneously pulled the chain-link of the handcuffs from the other side of the back seat.

Mr. Williams was not a threat of harm to any officer or individual on the scene.

31. Mr. Williams had not committed a crime to warrant the need to detain or the unreasonable use of force.

32. In spite of his suffering, Alex's primary concern was the safety and security of his three-year-old son, minor XW, who remained in the back of his truck, crying and in fear as his father was attacked.

33. Mr. Williams, concerned about his 3-year-old son, again asked the officers to allow him to call a family member to pick up the child who was in a complete state of panic and distress. This request was again ignored. He was under the threat of being placed in Child protective services(“CPS”) custody by officers.

34. Thankfully, a bystander good Samaritan, who was recording the events, asked Mr. Williams for the number, and called XW’s grandmother who arrived sometime later and XW was not taken to CPS.

35. While conducting a search of Mr. Williams information in their computer system, another civilian (White-Male) approached Bolin, and asked him about moving his squad car, and Bolin responded to this individual with respect and did not handcuff him or demand any proof of insurance or otherwise blow the situation out of control. The only difference between Williams and the other gentleman was their race.

36. To further illustrate Bolin’s ulterior racially motivated motives, another vehicle was parked on the other side of the handicap space in a similar manner but without issue.

37. As a demonstration of their willingness to openly violate the law, the deputies pulled Mr. Williams out of the car and said, “smile for the camera”, then immediately ordered him back in the car.

38. Harris County Sheriff's Office have put together special elite units around Harris County to harass intimate individuals engaged in lawful conduct based on their race. Each special elite unit has a supervisor, Ed Gonzalez has delegated his supervisory duties to each of those supervisors. The special elite is referred to and known as the "jump out boys" they operate with little meaningful oversight.

39. These unit members are known not just for constitutional violations but crimes.

40. Rawltyan Hart had loaded a Ruger LCP 380 handgun with the serial number scratched off and had been found inside of his patrol vehicle's driver's-side door panel; he remains on the force as a "jump out boy."

41. Mr. Williams asked the deputies what he was being arrested for, to which deputy Bolin's only response was to further punch and assault Alex.

42. Sometime later, Mr. Williams was seat belted by a third deputy and taken to the Harris County Jail where he was treated for his injuries and detained until he made bail on Friday, May 13, 2022.

43. On May 18, 2022, all criminal charges against Mr. Williams were immediately dismissed upon arraignment on grounds that no probable cause existed.

44. Harris County's policies and practices are the moving force behind Mr. Williams's civil rights being violated.

45. Ed Gonzalez, Harris County's policymaker for law enforcement, promoted, adopted, and ratified the unconstitutional conduct involving unlawful arrest of his officers by failing to train, re-train, supervise, or discipline officers that violate any written policies against unconstitutional conduct rendering the policies not policies at all.

46. The unlawful arrest of citizens is achieved by alleging certain and particular offenses like resisting arrest, evading arrest, trespassing, loitering, and interference with public duties.

47. These offenses are most often officer-initiated, do not require a third-party complainant, or are achieved without a third party complainant if required.

48. The particular offenses require the finder of fact to weigh the citizen's word and credibility against the officer complainant where officers have a great advantage, unless there is no probable cause for the arrest.

49. Harris County's practice of ratifying these unlawful arrests by failing to discipline deputies who engage in the unconstitutional practice and failing to train its officers against the unlawful practice.

50. In fact, Harris county promotes the practice by failing to supervise the arrests made by its officers that do not have third party witnesses by a simple review of body camera footage before the destruction of the body camera footage of the events that led up to the officer-initiated arrest.

51. Officer-initiated unlawful arrests without a third-party complainant could be prevented by Sheriff Ed Gonzalez requiring supervisors, like John Doe, to supervise the officers at the time of the arrest and requiring the supervisor's direct approval of an arrest of this nature that is officer initiated to ensure the arrest is made with probable cause, and not in retaliation, if training or retraining is unavailable.

52. Ed Gonzalez is personally responsible, accountable, and involved in the unconstitutional conduct of his officers by adopting and ratifying the actions of his deputies. These unconstitutional practices and policies by Harris County deputies, promoted and ratified by Harris County through its policymaker Ed Gonzalez, were widespread and the moving force behind Mr. Williams's constitutional rights being violated.

53. For example, between the time Mr. Williams was arrested and Sheriff Gonzalez came into office at least 48 individuals were arrested without probable cause causing assistant district attorneys to agree with arrest based on misleading and false information provided to make the determination and in retaliation of protected conduct under the First Amendment.

54. In September 2021, JERRY VACO was retaliated against due to exercising his right to speak when he made comments that Harris County Deputy Ellison did not like he was arrested and exposed to the use of excessive force as a result.

55. On April 29, 2022, IMARI INA KIDD (BF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 06, 2022.

56. On April 27, 2022, ALEXANDER A. VALESCO (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on December 05, 2022.

57. On April 25, 2022, XIOMARA FRANCISCA INTERIANO (HF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on December 19, 2022.

58. On April 23, 2022, LUIS ANTONIO GONZALEZ (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on December 14, 2022.

59. On April 21, 2022, HOPE MARIE MOYA (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 29, 2022.

60. On April 23, 2022, CHRISTOPHER RONALD PALMER (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on September 12, 2022.

61. On April 19, 2022, JESSICA MARTINEZ (HF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on December 21, 2022.

62. On April 16 2022, ABDIEL ALVARADO (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 22, 2022.

63. On April 16 2022, CHAVON LEVENSTONE (BF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on September 28, 2022.

64. On April 13, 2022, ERIC JAMES WALKER (BM) was arrested by Bolin the same officer who falsely arrested Mr. Williams also for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 20, 2022.

65. On April 10, 2022, JAHCORRIAN BURKES (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on January 19, 2023.

66. On April 11, 2022, EMMANUEL ALEXANDER MENDOZA (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting

charges based on the officer's misrepresentation of the facts to support criminal charges on October 25, 2022.

67. On April 8, 2022, EDGAR ALVAREZ GALICIA (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 11, 2022.

68. On March 30, 2022, MARISOL PORTILLO (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on November 10, 2022.

69. On March 29, 2022, JOSE BRANDON IBARRA (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's

favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on December 13, 2022.

70. On March 22, 2022, STERLING FELDER was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on November 15, 2022.

71. On March 15, 2022, ADAM THOMAS LONGORIA III (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 22, 2022.

72. On March 13, 2022, SASHA ARGUDIN (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County

District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 07, 2022.

73. On March 07, 2022, CHRISTOPHER IAN HAIR was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 09, 2022.

74. On March 06 2022, ZACHERY SHANE VILLEGAS (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on August 08, 2022.

75. On March 07, 2022, MARIO SALAZAR JR (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after

being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 14, 2022.

76. On March 1 2022, HUMBERTO LOPEZ-HIGUERA (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on August 12, 2022.

77. On February 26 2022, CARMEN MARTINEZ (HF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on September 27, 2022.

78. On February 21, 2022, DAVINA RENEE WILLIAMS (BF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris

County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 05, 2022.

79. On February 21, 2022, ANGELICA ALCANTAR (HF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on August 4, 2022.

80. On February 19, 2022, EFRAIN AGUAYO (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on February 24, 2022.

81. On February 18, 2022, CHARAF MOHAMAD (BM) was arrested by was arrested by Macias the same officer who falsely arrested Mr. Williams also for

interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on January 05, 2023.

82. On February 16 2022, TIMOTHY WRIGHT (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on February 25, 2022.

83. On February 15, 2022, GUILLERMO RIVERA (HF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on September 27, 2022.

84. On February 14, 2022, FATIMA EVELYN ARGUETA (HF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result

85. The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on February 21, 2022.

86. On February 11, 2022, YAKERRIA LASHAY WILLIAMS (BF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 10, 2022.

87. On February 09, 2022, JAMES ORTIZ (HM) was arrested by Bolin the same officer who falsely arrested Mr. Williams also for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting

officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on September 02, 2022.

88. On February 03, 2022, PHYLLIS JOLLY(BF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on December 07, 2022.

89. On January 28, 2022, MORGAN ARMAND GILFORD (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on February 10, 2022.

90. On January 26 2022, MEGAN HUYNH (AF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after

being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 09, 2022.

91. On January 24, 2022, GREGORY WILLIAMS (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on November 10, 2022.

92. On January 22, 2022, DANA GABRIELA GUERRA (HF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on October 24, 2022.

93. On January 22, 2022, WILLIAM SHERMAINE SANDERS (BF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the

defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 28, 2022.

94. On January 22, 2022, DHEJA SMITH (BF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on January 24, 2022. On January 18, 2022, LORENZO GONGORA was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on December 02, 2022.

95. On January 15, 2022, DAKOTA BAYARD (WF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after

being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on November 22, 2022.

96. On January 15, 2022, SHAKA CURTIS BARNES (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 05, 2022.

97. On January 10, 2022, OCTAVIO TREVINO was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 05, 2022.

98. On January 08, 2022, MARION LEMARK MCINTOSH (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the

defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on January 10, 2022.

99. On January 08, 2022, ERIC KEITH THOMAS JR (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on January 14, 2022.

100. On January 08, 2022, MYLES LEE WALLACE (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on January 14, 2022.

101. On January 08, 2022, DEREK HERNANDEZ (HM) was arrested by Bolin the same officer who falsely arrested Mr. Williams also for interference with public duties without probable cause based on the misleading allegations in the filed criminal

complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on September 29, 2022.

102. On January 02, 2022, SEMAJ ANDERSON (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 21, 2022.

103. On January 01, 2022, DEMETRIUS DEON MCDONALD(BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on January 07, 2022.

104. On July 18, 2018, CALDWELL, ANTHONY EARL was arrested by the HCSO deputies for Evading arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County

District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 19, 2020. On July 17, 2018, ANAH, PAUL FUMNANYA was arrested by the HCSO deputies for Evading arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 30, 2020.

On July 15, 2018, ALBARRAN, MIGUEL ANGEL was arrested by the HCSO deputies for Evading arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 30, 2020.

105. On July 14, 2018, PRADIA, NATHANIEL JUDES was arrested by the HCSO deputies for Evading arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the

officer's misrepresentation of the facts to support criminal charges on November 8, 2021. On July 14, 2018, QUEEN, MICHAEL DAVID was arrested by the HCSO deputies for Evading arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 7, 2020. On July 12, 2018, TORRES, GILBERT was arrested by the HCSO deputies for Evading arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 27, 2018. In July 2018, ALEXANDER, KHALON was arrested by the HCSO deputies for evading arrest without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on February 12, 2019.

106. On July 9, 2018, HUTSON, TODD ANTHONY JAMES (BM) was arrested by the HCSO deputy, GIBBS, GARY for Interference with emergency request for assistance without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on February 10, 2020.

107. On July 9, 2018, MARTINEZ, DANIEL (HM) was arrested by the HCSO deputies for Evading arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on September 4, 2019.

108. On July 7, 2018, MCCUTCHEON, DENECA (BF) was arrested by the HCSO deputy REINERT, JORDAN for Evading arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into

accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 9, 2018.

109. On July 7, 2018, WARNER, RENOIR DONYALE (BM) was arrested by the HCSO deputy, GONZALEZ, RUBEN for Evading arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 9, 2018.

110. On July 5, 2018, VICENTE, DEAJA was arrested by the HCSO deputy, ONTIVEROS-RIVERA, E for failing to ID a police officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on August 3, 2019.

111. On July 5, 2018, PEREZ, YVONNE LEE (HF) was arrested by the HCSO deputy CLINTON NASH, for failing to ID to a police officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the

defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 9, 2018.

112. On July 4, 2018, THOMAS, STEPHEN AARON (WM) was arrested by the HCSO deputy, ANDRE TRAN, for Evading Arrest in a Vehicle without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 6, 2018.

113. On July 3, 2018, MCGEE, BREANNE (WF) was arrested by the HCSO deputies for Interference with emergency request for assistance without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 3, 2018.

114. On July 1, 2018, SANCHEZ, ESTHER GUADALUP (HF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris

County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 6, 2019.

115. On July 1, 2018, MORENO, KIRSTEN SUZANNE (WF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 23, 2018.

116. On August 19, 2018, JOHNSON, GARY ALBERT (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 8, 2019.

117. On August 13, 2018, HERNANDEZ, MELISSA DAWN (HF) was arrested by the HCSO deputies for failing to ID to an officer without probable cause based on

the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on October 17, 2018.

118. On August 13, 2018, ALMANZA-HERNANDEZ, LETICIA (HF) was arrested by the HCSO deputies for interference with duties public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 28, 2021.

119. On August 13, 2018, DRAYTON, DOMINIQUE (BM) was arrested by the HCSO deputies for interference with duties public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on September 22, 2021.

120. On August 12, 2018, JARAMILLO-MOTA, JUAN CARLOS (HM) was arrested by the HCSO deputies for failing to ID to an officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on August 13, 2018.

121. On August 12, 2018, SALAZAR, MIGUEL ANGEL (HM) was arrested by the HCSO deputies for interference with emergency service req for assistance without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 22, 2021.

122. On August 11, 2018, SHORES, CORA YVONNE (WF) was arrested by the HCSO deputies for failing to ID to a police officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based

on the officer's misrepresentation of the facts to support criminal charges on August 13, 2018.

123. On August 10, 2018, ALVAREZ, NICHOLAS WAYNE (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 24, 2019.

124. On August 9, 2018, FLORES, JOHNSON SMITH (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 13, 2019.

125. On August 7, 2018, HERNANDEZ, JULIAN ANGELLO (HM) was arrested by the HCSO deputies for failing to ID to a police officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the

defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on November 8, 2018.

126. On August 7, 2018, SPEARS, ERIC (BM) was arrested by the HCSO deputies for evading arrest without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on November 15, 2019.

127. On August 6, 2018, WOODS, PATRICK (BM) was arrested by the HCSO deputies for evading arrest without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on February 7, 2019.

128. On August 6, 2018, VALENCIA, JESUS (HM) was arrested by the HCSO deputies for failing to ID to an officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the

officer's misrepresentation of the facts to support criminal charges on March 26, 2019.

129. On August 6, 2018, WHITE, DESMOND (BM) was arrested by the HCSO deputies for evading arrest without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on February 5, 2020.

130. On August 6, 2018, HEBERT, KEITH (BM) was arrested by the HCSO deputies for evading arrest without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 24, 2019.

131. On August 5, 2018, VALASQUEZ-BORJAS, WILLMER ALEXI (HM) was arrested by the HCSO deputies for Evading Arrest in a Vehicle without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting

charges based on the officer's misrepresentation of the facts to support criminal charges on October 2, 2020.

132. On August 5, 2018, SMITH, SINJIN (BM) was arrested by the HCSO deputies for Evading Arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on October 18, 2018.

133. On August 5, 2018, GARCIA, HERMAN HELAMA (HF) was arrested by the HCSO deputies for Evading Arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on October 1, 2021.

134. On August 2, 2018, CASTELLANO, ANGELITA (HF) was arrested by the HCSO deputies for Evading Arrest in a Vehicle without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after

being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on December 2, 2020.

135. On August 2, 2018, WATSON, RICKEY (BM) was arrested by the HCSO deputies for evading arrest without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on October 28, 2019.

136. On August 1, 2018, GALEANO, SANTOS (HM) was arrested by the HCSO deputies for interference with duties public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on November August 2018. On March 7, 2018, BATTLE, STEVEN LEJOHN (BM) was arrested by the HCSO deputies for interference with duties public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into

accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 10, 2018.

137. On March 11, 2018, LAYMOND, KENEAU (BF) was arrested by the HCSO deputies for interference with duties public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 13, 2018.

138. On March 11, 2018, BONNER, CHRISTOPHER (BM) was arrested by the HCSO deputies for interference with duties public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 13, 2018.

139. On March 11, 2018, LAYMOND, AKIA (BF) was arrested by the HCSO deputies for interference with duties public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's

favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 13, 2018

140. On March 11, 2018, CHESTER, JESSE LEE III (BM) was arrested by the HCSO deputies for Evading Arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 5, 2018.

141. On March 7, 2018, BROOKS, CHASE ROSHAD (BM) was arrested by the HCSO deputies for interference with duties public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 9, 2018.

142. On August 20, 2018, YBARRA, AMERICO (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after

being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on January 24, 2019.

143. On August 20, 2018, SHUDY, AMBER (WF) was arrested by the HCSO deputies for Evading Arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on August 22, 2018.

144. On August 19, 2018, WESTMORELAND, DEVIN JAMAL (BM) was arrested by the HCSO deputies for Evading Arrest in a Vehicle without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 24, 2019.

145. On March 7, 2018, CHAVEZ, LUIS (HM) was arrested by the HCSO deputies for Evading Arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County

District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 7, 2021.

146. On March 6, 2018, MILAM, BRANDON JAMES (WM) was arrested by the HCSO deputies for failing to ID to a police officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 7, 2018.

147. On March 6, 2018, JACOBS, KATIE I. (WF) was arrested by the HCSO deputies for failing to ID to a police officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 7, 2018.

148. On March 6, 2018, NIXON, TASYA A (BF) was arrested by the HCSO deputies for interference with duties public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's

favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on October 30, 2018.

149. On March 6, 2018, DUBOSE, SCOTT BRIAN was arrested by the HCSO deputies for Evading Arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 13, 2018.

150. On March 3, 2018, VIDAS, DIMITRIOS JIMMY (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 23, 2018.

151. On March 3, 2018, MCGILBRAY, JAMARCUS (BM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's

favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 9, 2018.

152. On March 2, 2018, SANCHEZ, FERNANDO HERNANDEZ (HM) was arrested by the HCSO deputies for Evading Arrest in a Vehicle without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 11, 2018.

153. On March 2, 2018, FISHER, FREMON JAMAYL (BM) was arrested by the HCSO deputies for Evading Arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on November 15, 2021.

154. On March 2, 2018, ECHOLS, LILLIE R (BF) was arrested by the HCSO deputies for Evading Arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County

District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 5, 2018.

155. On February 25, 2018, RETA VILLAGRAN, ARNULFO (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 23, 2018.

156. On February 25, 2018, MALDONADO GUEVARA, RICARDO (HM) A was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 23, 2018.

157. On February 24, 2018, VASQUEZ, JOSUE OZIEL (HM) was arrested by the HCSO deputies for Evading Arrest in a Vehicle without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County

District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 15, 2020.

158. On February 23, 2018, JOHNSON, ANDRE EUGENE (BM) was arrested by the HCSO deputies for failing to ID to a police officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on August 17, 2018.

159. On February 23, 2018, MORALES, JANET (HF) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 17, 2018.

160. On February 21, 2018, RUBIO, OSCAR GABRIEL (HM) was arrested by the HCSO deputy Jesus Alanis for Interference with emergency request for assistance without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to

dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on November 2, 2020.

161. On May 8, 2018, HANSON, DEREK was arrested by the HCSO deputy, JOSE PAIZ, for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 9, 2018.

162. On May 8, 2018, ROQUE PEREZ, JORGE (HM) was arrested by the HCSO deputy, Stephanie Rios, for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on May 9, 2018.

163. On May 7, 2018, MARTINEZ, SALVADOR (HM) was arrested by the HCSO deputy, ULISES GOMEZ, for failing to ID to a police officer without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the

defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on July 13, 2018.

164. On May 6, 2018, DICK, THOMAS was arrested by the HCSO deputy, RAY, ADAM for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on March 12, 2019 after he wrote a letter of apology.

165. On May 5, 2018, AGUILERA, ANDRES (HM) was arrested by the HCSO deputy, ERIC SANCHEZ, for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on June 25, 2018.

166. On April 30, 2018, AMENDAREZ-ACOSTA, DANY YAMITH (HM) was arrested by the HCSO deputies for Evading Arrest/Detention without probable cause based on the misleading allegations in the filed criminal complaint, as a result

The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on August 21, 2018.

167. On April 28, 2018, IVSHIN, MAXIM (WM) was arrested by the HCSO deputy Stephanie Quintanilla for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 30, 2018.

168. On April 28, 2018, CASTILLO-FLORES, REGINAL (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 30, 2018.

169. On April 28, 2018, WING, ISRAEL ALEJANDRO (HM) was arrested by the HCSO deputies for interference with public duties without probable cause based on

the misleading allegations in the filed criminal complaint, as a result The Harris County District Attorney's office was forced to dismiss the case in the defendant's favor after being initially misled by the arresting officer into accepting charges based on the officer's misrepresentation of the facts to support criminal charges on April 30, 2018.

170. The majority of the unconstitutional conduct in arresting individuals who are either, Black males, Black females, Hispanic/Latino males, Hispanic/Latino females, and women was based on their race and genders without a compelling or important governmental interest.

171. These individuals, like Mr. Williams, were targeted due to their national origin and or race. The discriminatory actions taken by the officers never resulted in any discipline by Ed Gonzalez in response to the overwhelming number of individuals whose rights were violated by his officers, after each complaint he and those who he delegated the duty to review complaints determined that the officers acted within the department's policy.

CLAIMS

Count I - Federal Civil Rights Claim Under 42 U.S.C. 1983 for Violation of the First, Fourth, Fourteenth Amendments, and Equal Protection

172. Each of the Paragraphs in this petition is incorporated as if restated fully herein. The defendants Bolin, Kerrigan, Macias, John Doe, Harris County, and Ed

Gonzalez acting jointly and in concert and conspiracy, violated plaintiff's rights under the United States Constitution to be free from racial profiling, unlawful arrest, unlawful use of excessive force, retaliation, and malicious prosecution.

173. The violations of plaintiff's constitutional rights under the First, Fourth and Fourteenth Amendments to the United States Constitution, plaintiff's damages, and the conduct of the individual defendants were directly and proximately caused by the actions and/or inactions of defendant Harris County Sheriff's Office ("HCSO"), which has encouraged, tolerated, ratified, and has been deliberately indifferent to the following policies, patterns, practices, and customs, and to the need for more or different training, supervision, investigation, or discipline in the areas of:

- a. Legal cause to stop, detain, arrest, and criminally charge a citizen;
- b. The use of force by police officers;
- c. The proper exercise of police powers, including but not limited to the making of an arrest, the use of force, and the bringing of criminal charges;
- d. The monitoring of officers whom it knew or should have known were suffering from emotional and/or psychological problems that impaired their ability to function as officers;
- e. The failure to identify and take remedial or disciplinary action against police officers who were the subject of prior civilian or internal complaints of misconduct;
- f. Police officers' use of their status as police officers to employ the use of force or to achieve ends not reasonably related to their police duties;
- g. The failure of police officers to follow established policies, procedures, directives, and instructions regarding arrests, the use of force, and the

institution of criminal charges under such circumstances as presented by this case;

h. The failure to properly sanction or discipline officers who are aware of and conceal and/or aid and abet violations of constitutional rights of citizens by other HCSO officials; and

i. The practice among HCSO officers of instituting false charges against individuals whom the officers have subjected to unlawful force with the intention of precluding such individuals from instituting civil claims.

174. Mr. Williams minor son was denied equal protection and due process under the 1st and 14th amendments when the HCSO deputies interfere with his familial relationship with his father during the retaliation and unlawful detention causing severe and lasting emotional distress and anxiety during the encounter, as he cried with fear and panic that resurfaces when he is the company of officers or sees officers while in public.

175. Mr. Williams and other individuals in the area are often detained for the sole purpose of adding them to the Gang Tracker Database.

176. The individuals are not provided notice or an opportunity to be heard.

177. Williams and others like him were not stopped by HCSO officers to investigate a crime, nor are they in the commission of a crime, during the investigatory stop made by HCSO officers, they detained African Americans, and

Latinos, like Mr. Williams without reasonable suspicion that any crime had been committed and proceeded to question them.

178. Although the officers can be friendly, or not either way the individuals do not feel free to leave.

179. These HCSO officers were not friendly when Mr. Williams was detained, but rather demanding.

180. He was made to allow the officers to analyze his tattoos to determine if they were gang related.

181. Mr. Williams does not have any gang related tattoos.

182. During the unlawful stop made by HCSO officers, they detained and searched Mr. Williams, and other individuals without reasonable suspicion that any crime had been committed, and certainly without probable cause based on the misleading allegations in the filed criminal complaint or warrant.

183. The officers proceeded to question him and take more photographs of Mr. Williams.

184. Again, Mr. Williams was not free to leave, and Mr. Williams did not feel free to leave.

185. Mr. Williams was profiled because he was of his race, African American, and had tattoos despite the nature of the tattoos.

186. There are eight criteria used to determine that a person is a gang member and should be documented, but only two of any of the eight criteria must be met.

187. The eight criteria include:

- i.a self-admission by the individual of criminal street gang membership that is not made during a judicial proceeding, including the use of the Internet or other electronic format or medium to post photographs or other documentation identifying the individual as a member of a criminal street gang;
- ii. an identification of the individual as a criminal street gang member by a reliable informant or other individual;
- iii.a corroborated identification of the individual as a criminal street gang member by an informant or other individual of unknown reliability;
- iv.evidence that the individual frequents a documented area of a criminal street gang and associates with known criminal street gang members;
- v.evidence that the individual uses, in more than an incidental manner, criminal street gang dress, hand signals, tattoos, or symbols, including expressions of letters, numbers, words, or marks, regardless of how or the means by which the symbols are displayed, that are associated with a criminal street gang that operates in an area frequented by the individual and described by Subparagraph (iv);
- vi.evidence that the individual has been arrested or taken into custody with known criminal street gang members for an offense or conduct consistent with criminal street gang activity;
- vii.(vii) evidence that the individual has visited a known criminal street gang member, other than a family member of the individual, while the gang member is confined in or committed to a penal institution; or
- viii.evidence of the individual's use of technology, including the Internet, to recruit new criminal street gang members.

188. The criterion “individual frequents a documented area of a criminal street gang” is an easy criterion to meet.

189. In applying criteria, there is no consideration that a person may reside in a gang area with their families, or the motives of a “reliable informant or other individual” prior to entering a person into the gang database.

190. Another criterion is self-admission. The self-admitted statement does not have to be recorded or documented, the allegation alone is sufficient.

191. There is no officer training required relating to gang database entry.

192. Mr. Williams is not a member of any street gang, but rather a talented artist, and working father.

193. He has been unjustly documented as a street gang member.

194. Additionally, Mr. Williams was never in the commission of a gang crime, under The Texas Code of Criminal Procedure 461, or any crime during either stop.

195. Harris County has a policy that allows its officers to engage individuals to determine if they can identify any of the eight criteria, in violation of *Terry v. Ohio*.

196. There is no requirement the HCSO officer advise the individual they are being documented as a gang member, the individual be notified of his entry into the gang tracker database as a documented gang member, or a requirement that the individual be allowed to respond to the allegation.

197. The HCSO policy encourages officers to document members of African American and Latino communities, because although there are no accommodations

or awards for such efforts the benefits come in the form of promotions, and acceptance into specialized elite units.

198. When Mr. Williams was entered in the gang tracker database for the first time is unknown.

199. He was not made aware at the time or after that he was being placed in the gang tracker database by HCSO.

200. There is no policy in the HCSO that any person that is placed in the gang database is entitled to notice they have been placed in the gang tracker database.

201. The database information is provided to potential employers, and local, state, and federal agencies, including court records used to enhance any crime outside domestic violence, and driving offenses causing prejudice.

202. HCSO division rarely finds that non-minorities meet the criterion for entry into the gang database, and have only identified three white gangs operating in the area, Aryan Brotherhood, Peckerwood, and Aryan Circle.

203. However, it is well known that the Aryan Brotherhood of Texas (ABT), Irish Mob, Dirty White Boys, White Knights of America, and the “White Knights,” to name a few also operate in Harris County.

204. There is no emphasis to place individuals that met the 2 of the 8 criterion in the gang database as members of non-minority gangs, although there are thousands of members of non-minority gangs in Harris County.

205. Entry into the database affects a person to obtain jobs, housing, and is used against them in court proceedings.

206. Individuals in the gang database are denied equal protection under the law as a result of the HCSO's unconstitutional practices targeting non-Caucasian minorities.

Count II- Texas Constitution- Texas Constitutions Article I, Section 19

207. Each of the Paragraphs in this petition is incorporated as if restated fully herein. As described in the preceding paragraphs, Under, Texas Constitutions Article I, Section 19, Deprivation of Life, Liberty, Etc. due course of law. No citizen of this State shall be deprived of life, liberty, property privileges or immunities, or in any manner disfranchised, except by the due course of the law of the land. Mr. Williams posed no threat of danger to Bolin or Macias, yet Mr. Williams was deprived of liberty by the unlawful arrest in front of his minor son by HSCO officers without justification, unreasonably and with excessive force. Macias failed to intervene or report the use of force or retaliation by Bolin.

208. Mr. Williams is seeking declaratory relief to require discipline of officers who intentionally arrest individuals without probable cause based on the misleading allegations in the filed criminal complaint and separate them from his child by threatening to deliver his child to CPS.



Count III - State Law Claims Intentional Infliction of Emotional Distress

209. Defendants Bolin and Kerrigan's intentional and reckless conduct inflicted severe emotional distress upon both plaintiffs by their extreme and outrageous use of excessive force and racially motivated violence against Mr. Williams and his son.

210. The Defendants' acts and omissions approximately caused both plaintiff's physical pain and emotional trauma. There is no alternative cause of action that would provide a remedy for the severe emotional distress caused by the Defendants' conduct against the minor bystander.

Count IV - State Law Claims Assault and Battery

210. Deputies Bolin and Kerrigan both committed unwarranted battery against Mr. Williams by kicking, punching, and slamming him causing him physical and emotional and mental injuries. The motivation was not in furtherance of Harris County interest rather ultra vires purposes and own personal interest.

Count V - State Law Claims False Imprisonment

211. As a result of Bolin and Kerrigan's illegal and unconstitutional actions, Mr. Williams was falsely imprisoned from May 10 through May 18, 2022 in various forms.

212. Further and as a result of Bolin and Kerrigan's action, XW was detained without consent or authority of law while his father was being beaten and illegally arrested.

Relief

Plaintiff prays that he has a judgment against Defendants for actual damages shown and proven at trial, for prejudgment, post-judgment interest, for costs of court, and all other relief, legal and equitable, to which he is entitled.

Wherefore, Plaintiff requests this Court to Order:

1. Compensatory damages;
2. Past pain and suffering
3. Mental anguish
4. Physical Impairment
5. Punitive damages against the individual defendants;
6. Attorney's fees and costs pursuant to 42 USC Sec.1988;
7. All other appropriate relief.

Plaintiff hereby demands a jury trial.

Respectfully submitted,

By: /s/Terry Henderson Peden
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CERTIFICATE OF SERVICE

I certify that on January 23, 2022, I served a true and correct copy of the proceeding First Amended Complaint to all parties or counsel of record.

/s/ U.A. Lewis
U.A. LEWIS