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JDAVISCOUNSEL

COMMONWEALTH OF KENTUCKY  
KENTON CIRCUIT COURT  
CASE NO. 25-CI-01527

JAMIR DAVIS,	:	
	:	
Plaintiff,	:	COMPLAINT FOR DAMAGES
	:	JURY TRIAL DEMANDED
vs.	:	
	:	
JEFF MANDO, ADAMS LAW PLLC,	:	
and CITY OF COVINGTON, and DOES 1-40	:	
individually and in their official capacity,	:	
	:	
Defendants.	:	

FIRST AMENDED COMPLAINT AND JURY DEMAND

INTRODUCTION

1. This case will expose a series of lies intended to disrupt, deflect, and ultimately protect the City of Covington’s long-standing pattern of shielding its worst police officers from accountability. At its core, this case arises from a coordinated campaign of intimidation and retaliation against a civil rights attorney, JAMIR DAVIS, who dared to challenge systemic misconduct by the City’s most notorious officers.
2. On multiple occasions, Covington police officers, acting under the authority of the CITY, drove past the offices of J. Davis Law Firm, PLLC, and directed threatening hand gestures at JAMIR and his staff—gestures simulating a gun being pointed and fired. These targeted acts of intimidation were not isolated incidents; they were part of a broader pattern of harassment and retaliation meant to silence criticism and discourage advocacy on behalf of marginalized communities.

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3. This behavior caused Plaintiff and his employees significant fear and distress, leading Plaintiff to install security cameras at his office, which documented and recorded the vehicle involved in these threatening acts.
4. This lawsuit concerns not only these intimidation tactics but also the unlawful retaliation Plaintiff has faced for filing lawsuits on behalf of Kentucky citizens who were harassed by Covington police officers.
5. The retaliation has included false statements made to federal judges.
6. This case further involves deliberate misrepresentations intended to interfere with an officer of the court and his business opportunities, along with threatening and distressing conduct enabled by public officials.
7. Defendant Jeff Mando and Adams Law PLLC, who represent the City of Covington Police Department and have been directly involved in defending its officers, deliberately breached their duty of honesty and accuracy to the Court by misrepresenting the legal arguments made by Jamir Davis in order to portray Plaintiff as using false or inaccurate law. These representations were untrue and are contradicted by evidence including deposition testimony.
8. At all times, Plaintiff understood and correctly applied the relevant law and policies in this matter and never sought to mislead the Court. Defendant Mando and Adams Law PLLC however, knowingly made false statements of material fact, harming Plaintiff's professional reputation.
9. The Defendants further collaborated with media outlets to spread these false statements and a misleading narrative.
10. This conduct amounts to civil assault and intentional infliction of emotional distress and reflects a disturbing abuse of authority by the City of Covington, which is responsible for the

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actions of its officers, as well as by its legal representative, Defendant Jeff Mando and Adams

Law PLLC, who have actively enabled and defended this misconduct.

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### JURISDICTION

11. This Court has subject matter jurisdiction pursuant to KRS § 23A.010, as the acts and omissions giving rise to this Complaint occurred within the Commonwealth of Kentucky.
12. Venue is proper in this Court under KRS § 452.410 because the Defendant resides and practices law within this jurisdiction and the harm to Plaintiff occurred in this County.

### PARTIES

13. Plaintiff, Jamir Davis, hereinafter "JAMIR" is and at all times herein mentioned was a resident of Kenton County, Kentucky, and is the managing attorney of J. Davis Law Firm, PLLC.
14. Defendant, Jeff Mando, hereinafter "MANDO" is an individual and licensed attorney practicing in Covington, Kentucky is named herein as a Defendant is the managing attorney of Adams Law and is the attorney of record for the City of Covington.
15. Defendant, Adams Law PLLC, hereinafter "ADAMS LAW" is named herein as a Defendant and is a practicing law firm in the City of Covington.
16. The City of Covington, hereinafter "CITY" is a municipal entity organized under the laws of the Commonwealth of Kentucky and is responsible for the conduct of its employees, including law enforcement officers.
17. DOES 1–40 are named fictitiously because Plaintiff is currently unaware of the identities of the other officers involved.

### PROCEDURAL HISTORY

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18. This case arises from the misconduct of Defendant Jeff Mando, in both his official and individual capacity, Adams Law PLLC, and the City of Covington, during and following the federal civil rights litigation styled *Wynn v. City of Covington*, Case No. 2:21-cv-00137, in the United States District Court for the Eastern District of Kentucky.
19. On August 16, 2024, the District Court issued a Memorandum Opinion and Order granting summary judgment in favor of the defendants and subsequently imposed sanctions under 28 U.S.C. § 1927 against Plaintiff Jamir Davis, counsel for Mr. Wynn, based on misrepresentations made by DEFENDANT MANDO. (Doc. #84).
20. Defendant MANDO falsely asserted to the Court that Plaintiff Davis had “unreasonably and vexatiously multiplied the proceedings” and refused to concede on frivolous claims. However, MANDO never provided any evidence that Plaintiff was ever contacted regarding dismissal or that he had knowledge of any impending motion. No email, letter, or conversation was offered into the record to substantiate that Plaintiff was placed on notice or acted in bad faith.
21. When Plaintiff requested that MANDO produce any such communication, MANDO failed to respond and made no effort to clarify or correct the record.
22. These false assertions were used by MANDO to secure sanctions against Plaintiff. The Court, relying on MANDO’s unsubstantiated claims, concluded that JAMIR had acted vexatiously and unethically.
23. In truth, JAMIR has never been disciplined in any fashion, nor has he ever had a bar complaint filed against him. His conduct has always reflected the ethical and zealous advocacy expected of a civil rights attorney representing marginalized and vulnerable clients.

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24. Following the Court's ruling, the CITY publicly referenced the sanctions order, using it to harm JAMIR's professional standing. These acts contributed to further reputational damage and compounded the harm caused by ADAMS LAW and CITY's litigation misconduct.

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### STATEMENT OF FACTS

#### A. False Allegation of Personal Liability Against Plaintiff's Counsel

25. On or about September 13, 2024, Defense Counsel Jeff MANDO filed a motion for sanctions in the United States District Court for the Eastern District of Kentucky, alleging that Plaintiff, Jamir Davis, had "unreasonably and vexatiously multiplied the proceedings" in violation of 28 U.S.C. § 1927.
26. MANDO asserted that JAMIR refused to concede claims when the frivolity of those claims should have been apparent.
- 27. However, prior to filing the summary judgment motion or any related motion, MANDO never contacted JAMIR to request dismissal or to confer on the merits of the claims.**
- 28. There was no letter from MANDO, phone call, email, or other communication requesting dismissal or discussing the viability of claims.**
29. When JAMIR requested that MANDO produce any such correspondence, MANDO failed to respond and failed to acknowledge the absence of any prior communication. (See Exhibit A – Email Correspondence Requesting Documentation of Prior Communications).

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Summarize this email

J

Jeff Mando

Jamir: Because of another 6th Circuit Brief that I had to file on Friday and an upcoming weeklong jury trial with pretrial filings and hearings, I need some add

J

Jamir Davis

Jeff, You filed a motion for attorney's fees against me in my capacity as an attorney without notice or any previous accusation of wrong doing. I'm not amicable

J

Jeff Mando

Jamir: I am disappointed. I have granted you numerous extensions throughout the course of the litigation and was looking for some reciprocity. I filed the Motio

J

Jamir Davis

I want to state this with all sincerity and professionalism: at no point did you request that I dismiss any of the causes of action prior to your motion for sum

J

Jeff Mando

Good morning, Jamir ! First, and with all due respect, the 1/1/21 claim, and the equal protection and self-incrimination claims, should never have been asserted

J

Jamir Davis <jdavis@jdaiviscounsel.com>  
to Jeff

Mr. Mando,  
  
You have a duty to be truthful to the court, regardless of your client's requests. Again, I am formally requesting that you provide any correspondence where you asked me to dismiss any cause of action prior to filing your Motion for Summary Judgment or at any time thereafter. If such correspondence exists, please produce it. If it does not, I would appreciate your acknowledgment of that fact.

J

Jamir Davis, Esq.

PRESIDENT

J. DAVIS LAW FIRM, PLLC

PHONE > (859) 750-5033

MAIL > 328 SCOTT ST., COVINGTON, KY 41011

EMAIL > JDAVIS@JDAIVISCOUNSEL.COM

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30. MANDO failed to respond at all to JAMIR’s email requesting correspondence or confirmation that none existed.

31. The absence of such communication directly refutes the assertion by MANDO that JAMIR refused to concede claims after notice because JAMIR was never put on notice that MANDO and CITY were filing a motion for summary judgment.

32. MANDO’s misrepresentation led the Court to believe Plaintiff had been given an opportunity to dismiss meritless claims and refused in bad faith, resulting in the imposition of sanctions under a false premise.

33. No such communication between MANDO and JAMIR ever occurred.

B. Withholding Evidence and Misleading the Court About Discovery

FALSE REPRESENTATIONS CONCERNING EQUAL PROTECTION CLAIM

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34. MANDO also misled the Court by falsely asserting that proceedings were duplicated because he and the CITY were forced to readdress a claim of equal protection on summary judgment.

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35. MANDO and Adams Law argued that JAMIR should be sanctioned for forcing Defendants to relitigate an Equal Protection claim that should have already been disposed of.

36. However, neither MANDO, ADAMS LAW, nor the CITY addressed the Equal Protection claim in their original motion for summary judgment. The claim was entirely omitted from DEFENDANTS' moving papers.<sup>1</sup>

37. In his Appellee Brief, MANDO specifically admitted that he did not address the Equal Protection claim in the original motion.

38. MANDO explicitly stated:

"Because Wynn failed to assert an Equal Protection claim in his Complaint, neither the Defendants nor the District Court were required – or even able – to address it. In short, Defendants were not obligated to preemptively argue against a claim that was never properly raised, and the District Court was not required to consider an argument that was not meaningfully pled." (Appellee Br., p. 27).

39. This admission confirms that DEFENDANTS never substantively addressed the Equal Protection claim in their original motion for summary judgment..

40. Despite this, MANDO and ADAMS LAW falsely accused JAMIR of unreasonably multiplying proceedings by continuing to litigate a claim that DEFENDANTS themselves admittedly failed to address.

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<sup>1</sup> In his original motion for sanctions, MANDO stated that JAMIR had failed to provide evidence that there even existed an equal protection claim, stating that plaintiffs "could not supply any evidence of racial discrimination". This information was considered by the judge in granting sanctions.

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41. MANDO and ADAMS LAW then submitted a sworn affidavit to the Court falsely claiming that he and his associates spent “20%” of their time defending the Equal Protection claim. This statement was a material misrepresentation. It directly contradicts the position taken in his own appellee brief, where he admitted that Defendants did not address the Equal Protection claim in their original motion for summary judgment at all.

42. MANDO then knowingly falsified records by claiming that he spent 28.7 hours defending the Equal Protection claim—despite previously stating that he did not even know the claim existed at that stage. Moreover, he claimed this time was expended prior to the filing of the motion for summary judgment, during a period in which briefing on that issue had not yet occurred and was not permitted. MANDO also falsely asserted that he spent 6.5 hours addressing the Equal Protection claim in the motion for summary judgment itself, despite entirely failing to brief or argue the claim in that motion. In his appellate brief, MANDO expressly admitted that the Equal Protection claim was not addressed in the original summary judgment filings. This contradiction further evidences a pattern of material misrepresentation intended to mislead the Court and harm JAMIR. <sup>2</sup>

43. This admission confirms that the Defendants did not brief or argue the Equal Protection claim until their reply. Nevertheless, MANDO and ADAMS LAW attempted to manufacture a basis for sanctions by falsely claiming significant litigation resources were expended defending a claim that MANDO previously acknowledged was not addressed. This contradiction further demonstrates a pattern of dishonest litigation tactics designed to mislead the Court and harm JAMIR’s professional standing.

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<sup>2</sup> According to Mando, the existence of the Equal Protection claim is tangential on whether or not he may bill someone else for it. If the Equal Protection claim is in JAMIR’s brief, it is presumed to not exist and is not necessary to respond to, but if the time for litigating it may be charged to JAMIR, it requires dozens of hours of legal research.



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44. This tactic deprived JAMIR of the opportunity to respond and misled the Court into believing that JAMIR had acted improperly by pressing a claim that had supposedly been fully litigated.

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45. These contradictions show that ADAMS LAW and MANDO's motion for sanctions was based on knowingly false premises.

**D. Misrepresentation of Discovery Record Regarding Racial Animus**

46. MANDO also falsely asserted that "no racial animus was found in discovery."

47. In fact, sworn testimony directly supported JAMIR's position. At deposition, Chief of Police NADER was asked:

Q: "Okay. Do you recall watching any body-worn camera footage of – of a – of a white Covington citizen being placed in a chokehold restraint of any kind?"

A: "I don't recall."

Q: "Okay. Do you recall viewing any body-worn camera footage of a white Covington citizen being punched in the face by a Covington police officer?"

A: "I don't recall."

(Nader Depo., pp. 37–38).

48. Chief NADER was responsible for reviewing all body-worn camera (BWC) footage of use-of-force incidents in Covington. MANDO was fully aware of this responsibility. Therefore, Chief NADER's inability to recall any instances involving similar treatment of white citizens constitutes material circumstantial evidence that such incidents did not occur.

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49. This testimony supports JAMIR's argument that Covington officers applied more aggressive tactics disproportionately against African American citizens.

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50. Officer ULLRICH also admitted:

Q: "Do you know if Black occupants of vehicles have been identified more than white occupants of vehicles?"

A: "I have nothing that suggests that to be true."

Q: "Do you have anything to suggest it to be false?"

A: "No."

(Ullrich Depo., pg. 38, ln. 1-24)

51. JAMIR also asked:

Q: "Have you ever been accused of racial discrimination?"

A: "Sure. Yes."

(Ullrich Depo., pg. 50, ln. 1-24)

52. MANDO, ADAMS LAW, AND CITY had full access to these depositions. He deliberately omitted this testimony and represented to the Court in his briefing that there was no evidence of racial animus in the record.

53. These misrepresentations formed the basis for the District Court's sanction order, which held that JAMIR's Equal Protection claim was "incendiary, bombastic, and not grounded in reality." (Doc. #84 at 18, 23, 24).

54. ADAMS LAW and MANDO's conduct on behalf of CITY, misled the Court and directly caused reputational and financial harm to JAMIR.

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55. JAMIR has never been disciplined, sanctioned, or had a bar complaint filed against him.

ADAMS LAW and MANDO's assertions to the contrary were knowingly false and made to disparage JAMIR's professional reputation.

IDAVIS COUNSEL

**E. MANDO made misrepresentations to the judge regarding the Claim that Elsbrend, Ullrich, and Murphy were present**

56. MANDO represented that Jamir should have known that he needed to concede based on the fact that there were multiple body-worn camera footage produced showing that certain officers were not on the scene for the 1-1-23 incident. MANDO made that argument to the court knowing that he only produced body-worn camera footage of Officer Griswold, Officer Ashley, Officer Krieger and Officer Durairaj, despite JAMIR clearly requesting all body-worn camera footage. From the footage received by JAMIR, there were clearly at least four other officers on the scene. Without access to all of the footage, JAMIR could not be certain which officers were on scene.

**F.. Misrepresentation of Fifth Amendment Claim**

57. MANDO falsely mischaracterized Plaintiff's Fifth Amendment self-incrimination claim. He stated that Plaintiff claimed it was unconstitutional for officers to ask a passenger for identification, and cited established case law permitting such requests.

58. However, MANDO knew from Officer Murphy's deposition—during which he was present—that the actual claim was based on coercion after Plaintiff explicitly refused to identify himself. Plaintiff contended that Officer Murphy coerced him into self-identification under threat of arrest and penalty for a minor traffic infraction that was never pursued. (Murphy Depo. 2024-03-13 pg 46 f ¶¶; 236–299).

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Deposition testimony MANDO admitted that they can refuse:

MR. MANDO: Objection. Characterization. He said he asked for ID.

MR. DAVIS: He --

MR. MANDO: They have the right to refuse.

(Murphy Depo. 2024-03-13 pg 52-53 f ¶¶; 273-277).

Deposition testimony also shows that there was a refusal but then coercion:

Q So at seven minutes, after Anthony Wynn refused, is that when you first identified to him that you're asking his information for a seat belt?

MR. MANDO: Objection. Form. Go ahead, John.

A I'm aware he wasn't wearing a seat belt while I'm asking him. And he said no, and I advised him he was not wearing a seat belt.

Q And that was after he refused to give you information --

A (Interrupting) Correct.

Q -- is that correct?

A Correct.

Q Okay. Typically, if an individual refuses to give identification or information, do you force them to?

A Are they committing a violation?

Q That -- that's not the question. My question is: If -- typically, if an individual refuses to give you their identification or information on who they are, do you force them to?

MR. MANDO: Objection. Go ahead and answer.

A If they have a violation -- if they commit a violation, I need their information because I have to write that on a citation.

(Murphy Depo. 2024-03-13 pg 37 f ¶¶; 181).

59. At no time did JAMIR present a legal argument that officers may not ask for identification, but that the plaintiff may not be coerced or extorted into providing such. Mando omitted

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these critical facts and misrepresented the nature of Plaintiff's legal argument to the Court, causing the Court to find the self-incrimination claim frivolous and impose additional sanctions.

60. Mando specifically wrote: "DAVIS SHOULD HAVE KNOWN THE SELF-INCRIMINATION CLAIM

HE ASSERTED AGAINST DEFENDANTS ON WYNN'S BEHALF WAS FRIVOLOUS." MANDO,

Adams Law, and CITY further misrepresented: "Davis argued that Officer Murphy violated

Wynn's right against self-incrimination under the Fifth Amendment based on the fact that

Officer Murphy asked Wynn, who was a passenger... to identify himself... Had Davis

conducted even basic research... he would have known that claim was frivolous."

61. These statements were knowingly false. The real argument—based on coercion following

refusal—was legally distinguishable and supported by deposition testimony that Mando

was present for.

62. The false statements by MANDO and CITY confused the Court and directly contributed to the

issuance of sanctions.

63. The Court's conclusions and its decision to issue sanctions under 28 U.S.C. § 1927 were

materially influenced by MANDO's deliberate mischaracterizations of the record, including

omission of testimony from both Chief Nader and Officer Murphy.

64. Defendant MANDO and ADAMS LAW knowingly misrepresented Plaintiff's argument as

based on false law. This misrepresentation was made to secure unwarranted sanctions and

to harm Plaintiff's reputation.

#### **G. Public Disparagement and Harassment**

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65. Following the sanctions order, the CITY issued public statements referencing the ruling, thereby using MANOD's litigation misconduct to further damage the professional reputation of Plaintiff. (See Exhibit B – City of Covington Public Statements Regarding Sanctions).

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Bunning tossed the case on Aug. 16, 2024. The city then filed a motion for Wynn to pay the city's legal fees for the case. Courts mandating plaintiffs to pay for defendants' legal fees is rare, as the standard for such an ask is higher for defendants. The city also sought sanctions against Davis for frivolous lawsuits.

On April 8 of this year, the court granted part of the city's request for attorney's fees and as well as the sanctions.

"Plaintiff presented no evidence whatsoever to support his claim that Defendants Murphy and Elsbernd discriminated against Plaintiff on the basis of his race or ethnicity," Bunning's order reads. "The entirety of the analysis or explanation given was, seemingly, that Plaintiff is a recognizable African American and Defendants Murphy and Elsbernd are white. Moreover, when put in a position to defend such claims in summary judgment, Mr. Davis, on behalf of his client, explicitly refused to present to this Court any explanation, analysis or evidence."

*LinkNKY article by Nathan Granger published on April 22, 2025*

66. Plaintiff was prejudiced by ADAMS LAW and MANDO's actions, which included knowingly false statements, deliberate omissions of material testimony, and an abuse of litigation processes in an attempt to discredit opposing counsel and secure an unwarranted advantage in the case.

#### **H. Assault and Intimidation**

67. After the filing of the federal complaint, JAMIR experienced a pattern of harassment by members of the CITY's Police Department. He was pulled over on multiple occasions without legal basis, and his staff was followed without cause.

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68. On multiple occasions, individuals affiliated with the CITY's Police Department drove past

Plaintiff's law office and made threatening gestures.

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69. On August 1, 2024, Kaylah Bozman, an employee for JAMIR, witnessed a man in a City of Covington Police Department vehicle stopping in front of the J. Davis Law Office. The man stared at her for a long period of time before pointing at her in a threatening manner and then speeding off.

**AFFIDAVIT**

I, Kaylah Bozman, have been working for J. Davis Law Firm, PLLC since April 2023. On or about August 1, 2024, at approximately 6:00 PM, I was sitting at the front desk inside the office of J. Davis Law Firm, PLLC, located at 328 Scott Street, Covington, Kentucky 41011. Since the office front is made of glass from ceiling to floor, it is quite common for me to look up and observe the road from time to time throughout my shift.

During this time, a Covington Police Department vehicle caught my attention because it slowed down almost immediately as it reached the front of the office. The office is approximately 100 feet from a traffic light, and most cars slow down when the light is red. However, this instance was quite different, as I noticed the vehicle didn't have any traffic in front of it.

Driving the vehicle was a Caucasian man with brown hair, brown facial hair, and sunglasses. As the vehicle slowed down, he stared directly into the office at me for an uncomfortably long time. I began to feel uneasy while he was looking at me, and he slowly raised his hand and pointed at me while smirking. My anxiety quickly rose because the gesture felt extremely threatening.

After making that intentional gesture, the police officer began to pick up speed and drove off. I became fearful and immediately left my desk to find Jamir Davis. He was in his office, and I frantically tried to tell him what had happened. While I was still shaken, we both walked outside the office to try and catch a glimpse of the vehicle and attempt to identify it. The vehicle was too far down the road to be able to see its identification.

This incident was completely unexpected and left me scared and highly concerned that something similar—or worse—could happen again. To this day, I still don't feel completely safe around the Covington Police Department, especially while at work at J. Davis Law Firm, PLLC.



Kaylah Bozman  
August 7, 2024

70. As a result of that, JAMIR was compelled to install surveillance cameras around the premises of his office to protect its staff from further harassment and intimidation.

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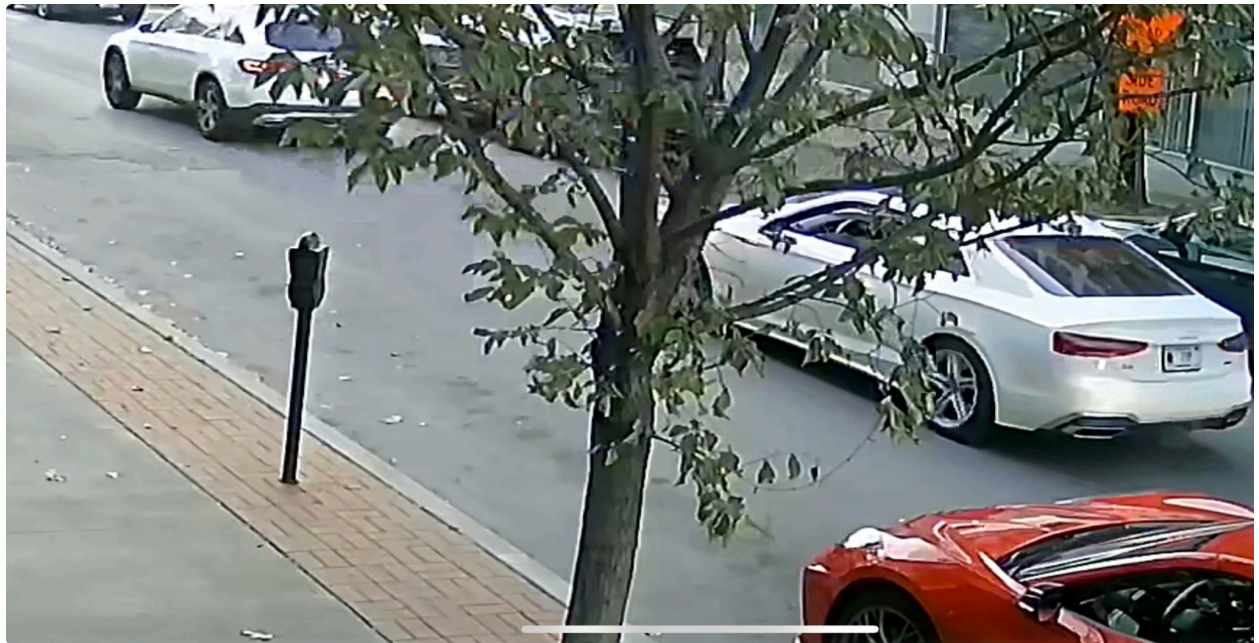
71. One of the most egregious incidents occurred on or about December 3, 2024, when a white

Audi with police federation decals drove past J. Davis Law Firm, PLLC. The driver rolled

down his window and made a hand gesture simulating a firearm being aimed and

discharged at JAMIR and his staff. This incident was witnessed by Plaintiff's intern. (See

Exhibit C – Affidavits of J. Davis Law Firm Staff Regarding Harassment).



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**AFFIDAVIT OF LONDON BURGE**

I, London Burge, on December 3, 2024, at approximately 4:00 PM, I was sitting at the conference table inside the office of J. Davis Law Firm, PLLC, in Covington, Kentucky. While there, I observed a man in a white vehicle stopped outside the office due to a red light. He was staring into the office for an extended period, which I noticed because of the stalled traffic. Mr. Jamir Davis, who was sitting with me, asked, "Do you see that man staring?" and I responded, "Yeah," confirming that I saw him too. As the vehicle began to pull off, the man pointed his fingers in our direction, mimicking a gun and pretending to shoot at Mr. Davis. As he drove away, I took note of the license plate, which appeared different than a typical plate and resembled that of a government or state-issued vehicle. The entire incident left me disturbed and concerned, given the threatening nature of the gesture and the official appearance of the vehicle.



London Burge  
04/22/2025

72. These actions were intended to intimidate and harass Plaintiff under color of law. Despite Plaintiff's attempts to report the misconduct and file complaints, the CITY's Police Department refused to process his reports, and the CITY has taken no disciplinary or investigative action.

73. These retaliatory actions by law enforcement personnel, combined with the CITY's refusal to investigate or intervene, have created a hostile and dangerous environment for Plaintiff and his employees, further exacerbating the reputational and emotional harm caused by Defendants' prior misconduct.

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74. Plaintiff believes these acts were carried out under color of law, with the intent to intimidate

and harass. The CITY has failed to investigate or discipline the officers involved. These

actions created a hostile and unsafe environment, and have not been investigated or

disciplined by the CITY. (See Exhibit C – Affidavits of J. Davis Law Firm Staff Regarding

Harassment).

**I. Assault and Intimidation**

76. CITY of Covington then pulled JAMIR over multiple times for violations that did not occur.

77. On May 5th, 2024, JAMIR was pulled over by a CITY of Covington officer for allegedly failing to use his blinker.

78. Upon being pulled over, the officer inquired if JAMIR had any weapons in the car. JAMIR inquired why the officer was asking this question since the stated reason for the stop was for failing to signal.

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79. The officer then stated “so you don’t want to answer any questions huh?”, and then forced JAMIR to wait for nearly thirty minutes for three other units to arrive and administer a window tint test.

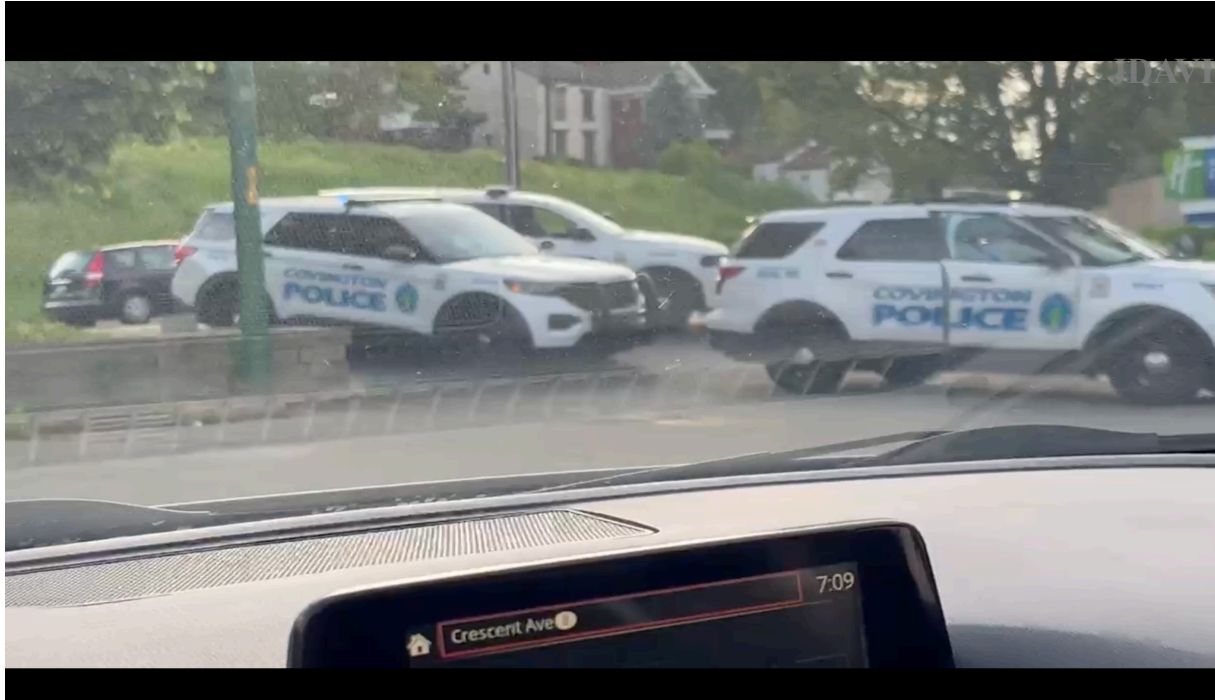
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80. JAMIR was then cited for failing to signal despite him using his signal correctly.

81. In fear of the baseless citation being realized in court, the CITY dismissed the citation.

82. In an attempt to hold the CITY responsible and protect fellow citizens from unjustified harassment, the next day JAMIR attempted to file a complaint with the CITY of Covington police department, only to be told that they would not accept his complaint.

### **FIRST CAUSE OF ACTION – NEGLIGENCE**

(AGAINST DEFENDANTS JEFF MANDO, ADAMS LAW, AND CITY OF COVINGTON)

83. Plaintiff re-alleges and incorporates by reference paragraphs 1–23 of this Complaint.

84. Defendants MANDO, ADAMS LAW, and the CITY owed the Plaintiff a duty of care, honesty, and professionalism, especially in the context of litigation and public representation.

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85. Defendants breached their duties by making false and misleading representations to the Court, publishing defamatory statements, and failing to prevent and address retaliatory harassment by CITY employees and law enforcement officers.

J. DAVIS COUNSEL

86. These breaches directly and proximately caused Plaintiff reputational harm, emotional distress, economic damages, and interference with his legal practice.

### **SECOND CAUSE OF ACTION – DEFAMATION**

(AGAINST ALL DEFENDANTS)

87. Plaintiff re-alleges and incorporates by reference paragraphs 1–27 of this Complaint.

88. Defendant MANDO and ADAMS LAW knowingly made false statements of fact about Plaintiff's legal actions and conduct in public legal filings and in open court.

89. The CITY of Covington further perpetuated these falsehoods through public statements that damaged Plaintiff's reputation as a civil rights attorney.

90. These statements were made with malice, were not privileged, and were designed to damage Plaintiff's professional reputation and credibility.

91. As a direct and proximate result, Plaintiff suffered reputational damage, mental anguish, and economic harm.

### **THIRD CAUSE OF ACTION – INTENTIONAL MISREPRESENTATION**

(AGAINST DEFENDANTS JEFF MANDO, ADAMS LAW, AND CITY OF COVINGTON)

92. Plaintiff re-alleges and incorporates by reference paragraphs 1–37 of this Complaint.

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93. Defendants MANDO and ADAMS LAW knowingly made false and material misrepresentations to the Court concerning Plaintiff's legal arguments, the content of discovery, and the absence of supporting evidence—all of which were contradicted by deposition testimony and record evidence available to him.
94. Defendant CITY, through its agents and officials, further perpetuated these false narratives by publicly endorsing and amplifying the Court's sanction order that was obtained through ADAMS LAW and MANDO's misrepresentations.
95. These misrepresentations were made intentionally, with the intent to deceive the Court, discredit Plaintiff, and secure an unfair litigation advantage.
96. The Court relied upon these falsehoods in issuing its order for sanctions and judgment, causing irreparable harm to JAMIR's professional standing and legal practice.
97. As a direct and proximate result of DEFENDANT's intentional misrepresentations, JAMIR suffered economic damages, reputational injury, emotional distress, and interference with business relationships.
- FOURTH CAUSE OF ACTION – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
(AGAINST DEFENDANTS JEFF MANDO, CITY OF COVINGTON, ADAMS LAW, AND DOES 1-50)
98. Plaintiff re-alleges and incorporates by reference paragraphs 1–37 of this Complaint.
99. The repeated and deliberate acts of Covington police officers simulating gun violence directed at JAMIR constitute extreme and outrageous conduct.
100. These acts were committed under color of law with the intent to intimidate, harass, and emotionally destabilize Plaintiff.

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101. Defendants ADAMS LAW and MANDO's false accusations and misrepresentations to the

Court likewise constitute extreme and outrageous conduct that compounded the harm and trauma to Plaintiff.

102. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered severe emotional distress, humiliation, reputational harm, and disruption of his professional and personal life.

### **DAMAGES**

As a direct and proximate result of Defendants' actions, Plaintiff has suffered the following damages:

- Emotional distress;
- Damage to professional reputation;
- Attorneys' fees and costs incurred in defending against false accusations;
- Economic harm due to disruption of business;
- Other compensatory and punitive damages as may be proven at trial.

### **JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues so triable.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that the Court:

- Enter judgment in favor of Plaintiff and against Defendants;
- Award compensatory damages in an amount to be determined at trial;
- Award punitive damages where appropriate;
- Award attorneys' fees and costs incurred in this action;
- Grant any other relief the Court deems just and proper.

Respectfully Submitted,

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/s/ Jamir Davis

Jamir Davis, Esq.

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JDAVISCOUNSEL

**Certificate of Service**

I, Jamir Davis, am a citizen of the United States. I am over the age of 18 years old and caused the document(s) to be filed electronically via ECF to the following parties. I did not receive a notification that the electronic transmission was unsuccessful.

Executed on Aug, 12, 2025.

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/s/ Jamir Davis  
Jamir Davis, Esq.

JDAVISCOUNSEL