



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**New Case Electronically Filed: COMPLAINT**  
**October 6, 2025 16:15**

By: W SCOTT RAMSEY 0070820

Confirmation Nbr. 3636800

HENRY RAY

CV 25 125898

vs.

CUYAHOGA COUNTY SHERIFF DEPT., ET AL.

**Judge:** KELLY ANN GALLAGHER

**Pages Filed:** 6

IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO

HENRY RAY	:	CASE NO.:
19709 LIBBY ROAD	:	
MAPLE HEIGHTS, OHIO 44137	:	
	:	
Plaintiff,	:	JUDGE:
	:	
v.	:	
	:	
CUYAHOGA COUNTY SHERIFF'S DEPT.	:	COMPLAINT
1215 WEST 3 <sup>RD</sup> STREET	:	(Jury Demand Endorsed Hereon)
CLEVELAND, OHIO 44113	:	
	:	
and	:	
	:	
DEPUTY JAMES DECREDICO	:	
c/o CUYAHOGA COUNTY SHERIFF	:	
1215 WEST 3 <sup>RD</sup> STREET	:	
CLEVELAND, OHIO 44113	:	
	:	
and	:	
	:	
OFFICER ISEN VAJUSI	:	
c/o CUYAHOGA COUNTY SHERIFF	:	
1215 WEST 3 <sup>RD</sup> STREET	:	
CLEVELAND, OHIO 44113	:	
	:	
Defendants.	:	

Now comes the Plaintiff, Henry Ray, by and through counsel, and for his Complaint against Defendants, Cuyahoga County Sheriff, Deputy James Decredico and Officer Isen Vajusi, hereby avers the following:

I. PRELIMINARY STATEMENT

1. This civil rights action challenges the unconstitutional actions committed by the Defendants on or about October 6, 2023 against the Plaintiff. On that date, the

Defendants, the Cuyahoga County Sheriff's Department (hereinafter "Defendant County Sheriff"), Defendant Deputy James Decredicao (hereinafter "Defendant Decredicao") and Defendant Officer Isen Vajusi (hereinafter "Defendant Vajusi") violated certain rights guaranteed under the United States and Ohio Constitutions by wrongfully, unlawfully and without just cause battering, humiliating, falsely and maliciously prosecuting and injuring Plaintiff. Defendant County Sheriff is liable due to its unlawful and/or lack of proper training of its officers and because of its policy and custom of encouraging, permitting and/or ratifying a pattern of unlawful conduct which was known to it or should have been known to it at the time of these offenses.

## II. JURISDICTION

2. This Court has personal and subject matter jurisdiction as all conduct complained of herein occurred in Cuyahoga County, Ohio. Venue is proper.

## III. PARTIES

3. Plaintiff at all times relevant to this action has been a resident of Maple Heights, Ohio. Plaintiff is a law abiding citizen and at the time of the actions complained of herein was a corrections officer.
4. Defendant County Sheriff is a department organized under the laws of the County of Cuyahoga and State of Ohio. The Defendant County Sheriff is responsible for the training, policies, practices and customs of its officers and is/was the employer of Defendants Decredico and Vajusi.

5. Defendant Decredico at all times relevant to this action was an officer, employee and/or agent of Defendant County Sheriff and acting under the color of law.
6. Defendant Vajusi at all times relevant to this action was an officer, employee and/or agent of Defendant County Sheriff and acting under the color of law.

#### IV. FACTS

7. On October 6, 2023, Plaintiff was lawfully operating his motor vehicle in the area of Rockwell Avenue and East 21<sup>st</sup> Street, in the near downtown area of the City of Cleveland, County of Cuyahoga, State of Ohio.
8. At that time, Defendants Decredico and Vajusi, while operating a Cuyahoga County police cruiser and therefore under the color of law, stopped Plaintiff for a minor misdemeanor, that being tail light and/or illumination of rear plate.
9. After stopping Plaintiff and without probable cause, Defendants Decredico and Vajusi conducted an illegal “search” of his vehicle.
10. Defendant(s) Decredico and/or Vajusi tell Plaintiff that the vehicle he is driving is stolen, which is untrue as Plaintiff provides proof of ownership.
11. Even though Plaintiff was stopped only for a minor misdemeanor infraction, Plaintiff is removed from his vehicle, slammed against the hood of the car, assaulted and handcuffed and placed in the rear of the police cruiser next to a vicious k-9 officer. All of which caused injury to the Plaintiff.
12. At this time, Defendants Decredico and Vajusi conduct an illegal “search” of plaintiff’s vehicle, without probable cause as required by the U. S. and Ohio Constitutions.

13. During this “search” Defendants Decredico and Vajusi supposedly “find” marijuana, pills and white powder in his vehicle. Plaintiff vehemently denies that there are any drugs in his vehicle.
14. Defendant(s) Decredico and/or Vajusi then issue a citation to Plaintiff only for illegal window tint and for his rear license plate not being illuminated. Plaintiff is not charged with any drug related charges at this time. Plaintiff is released.
15. On October 3, 2024, almost a year after the actions complained of herein, Plaintiff initially filed the instant matter against Defendants Decredico and Vajusi (that action was voluntarily dismissed and the instant complaint is the re-filing of that action).
16. About 3 weeks after filing the initial suit against Defendants, but over 1 year after the traffic stop, Plaintiff is charged in Cuyahoga County Common Pleas Court with 2 counts of drug possession alleging that drugs were found during the illegal and unconstitutional “search” of Plaintiff’s vehicle. The Charges were filed on October 25, 2024.
17. Defendant(s) Decredico and/or Vajusi had either planted drugs in Plaintiff’s vehicle or falsely accused Plaintiff of possessing drugs that were never found in his vehicle at all.
18. On July 2, 2025, Plaintiff pled guilty to a minor misdemeanor infraction of tail lights, illumination of rear plate. All drug possession charges were dismissed or amended to minor misdemeanor traffic violations, that were totally non-drug related.

V. CAUSES OF ACTION  
42 U.S.C. sec. 1983 CLAIMS

19. All of the preceding paragraphs are incorporated herein as if fully re-written.

20. At all times relevant herein Defendants Decredico and Vajusi acted under the color of State law.

21. In searching Plaintiff's vehicle without probable cause that a crime had been or was being committed, Defendant(s) Decredico and/or Vajusi violated Plaintiff's 4<sup>th</sup> and 14<sup>th</sup> Amendment rights against illegal searches and seizures.

22. By planting drugs and/or accusing Plaintiff of possessing drugs that did not exist, Defendant(s) Decredico and/or Vajusi violated Plaintiff's 4<sup>th</sup> and 14<sup>th</sup> Amendment rights against illegal searches and seizures.

23. By employing excessive and unreasonable force in the arrest and/or detention of Plaintiff for minor misdemeanor infractions, Defendant(s) Decredico and/or Vajusi violated Plaintiff's 4<sup>th</sup> and 14<sup>th</sup> Amendment rights against illegal searches and seizures.

24. Defendant County Sheriff failed to properly train Defendants Decredico and/or Vajusi which led to constitutional violations suffered by Plaintiff. Further, Defendant County Sheriff had a policy and/or custom that was the moving force behind the violations suffered by Plaintiff and Defendant County Sheriff manifested a deliberate indifference to the policies and/or customs, or lack of proper training that led to the violations suffered by Plaintiff in this matter.

STATE CLAIMS

25. All of the preceding paragraphs are incorporated herein as if fully re-written.
26. The actions complained of herein constitute malicious prosecution by Defendant(s) Decredico and/or Vajusi.
27. The actions complained of herein constitute assault and battery by Defendants Decredico and/or Vajusi.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for the following relief against Defendants:

- A. Compensatory damages against Defendants jointly and severally in an amount to be determined at trial in excess of the Court's jurisdictional amount;
- B. Punitive damages against the individually named Defendants in an amount to be determined at trial;
- C. Attorney fees and other related costs of this litigation;
- D. Any and all other relief that this Court deems appropriate.

VII. JURY DEMAND

Plaintiff respectfully demands a jury on all causes of action complained of herein.

Respectfully Submitted,

W. Scott Ramsey

W. Scott Ramsey (0070820)  
55 Public Square, Suite 2100  
Cleveland, Ohio 44113  
(216)696-5520

Counsel for Plaintiff