

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

DRAKKAR WILLIAMS,  
Plaintiff,

-V-

Case No.  
Hon.

LEIUTENANT MATTHEW FURMAN,  
OFFICER M. RAHMAN,  
CITY OF MELVINDALE,  
in their individual and official capacity,  
Defendants

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**COMPLAINT and JURY DEMAND**

There is no other pending or resolved cases between these parties or other parties arising from the transaction or occurrence alleged in the complaint.

/s/ David A. Robinson  
**David A. Robinson (P38754)**

**NOW COMES** the Plaintiff, by and through his attorneys, and for his complaint against the Defendants says as follows:

**PARTIES**

1. At all pertinent times, Plaintiff Drakkar Williams was a resident of Wayne County, and citizen of the State of Michigan.
2. Lieutenant Matthew Furman and Lieutenant M. Rahman (hereafter Individual Defendants) were citizens of the State of Michigan, and at all times worked and were employed as police officers in the City of Melvindale in the State of Michigan.
3. Defendant City of Melvindale is a municipal corporation located in Wayne County, Michigan and operates subject to the laws and constitutions of both the State of Michigan and the United States of America.

#### **JURISDICTION and VENUE**

4. Individual Defendants were at all pertinent times employed as police officers for the Defendant City of Melvindale and were, at all times pertinent, acting under color of state law and pursuant to customs, policies and practices of their department.
5. Plaintiff brings this action under the laws of the State of Michigan, the United States Constitution, and 42 U.S.C. §1983.
6. The actions giving rise to this complaint arose entirely within Wayne County, Michigan on and after July 20, 2024.
7. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000).

#### **FACTUAL ALLEGATIONS**

8. On or about July 20, 2024, Plaintiff Williams was driving his vehicle traveling on Wall Street in Wayne County while his girlfriend Tashiyon Turner was a passenger in the vehicle.
9. Defendant Furman activated his emergency lights and stopped the vehicle being driven by Plaintiff.
10. Defendant Furman approached Plaintiff's vehicle and after an initial inquiry began aggressively yelling at Plaintiff.
11. Plaintiff Williams had just earlier left his home in an emergency to meet a relative who had been in a serious injury accident in Dearborn Michigan.
12. Defendant Furman called for another Melvindale officer and Defendant Rahman, arrived at the scene. Once Rahman arrived Furman ordered Plaintiff out of the car telling him to put his hands on top on the roof. As Plaintiff was complying Rahman grabbed his right arm and shoulder, controlling both, affixing Plaintiff to the roof of the car, in a tactical effort to control his ability to move. Earlier while at the accident scene in Dearborn, a Dearborn police officer learned Plaintiff and his girlfriend lived in Melvindale. Learning this, the Dearborn warned the Plaintiff and his girlfriend of "the Melvindale" police officer Furman to watch out for him; that he is a racist and a corrupt cop having a reputation for being highly abusive and overly aggressive.

13. Despite the additional officer protection provided by Rahman's presence and his having physical control of Plaintiff, Furman immediately became highly agitated and in an adrenaline filled rage, ordered Plaintiff to take his hands off the roof and put them behind his back. At the same time Rahman's still maintained control over him. Plaintiff was unable to immediately move due to Rahman's control over him. Furman, consistent with his reputation for abusing citizens, ignored the fact that Rahman had control of Plaintiff and that Plaintiff had not struggled with Rahman, yet still in his highly charged adrenaline state, began illegally drive stunning Plaintiff multiple times all over his body even to the point of stunning officer Rahman. At all times Plaintiff was compliant and never acted in a threatening manner toward either defendant.
14. The powerful electrical voltage from the taser caused an involuntary physical reaction leaving permanent drive stun injury to Plaintiff's body.
15. At no time did Defendant Rahman intervene to stop or attempt to control Furman's illegal conduct or excessive force. Rahman was a supervisor of the same rank as Furman at the time of this interaction.
16. Though on the ground and surrounded by Rahman and other Melvindale officers who had arrived and who clearly had control over the cuffed Plaintiff, Furman continued his illegal force stomping on Plaintiff's right side ribs claiming the need to control Plaintiff. Plaintiff Williams' reaction was to

express his valid concern over Furman's excessively forceful behavior exclaiming Furman was wrong. Furman then began a campaign of retaliation in response to Plaintiff's legitimate exclamation of outrage to Furman's unlawful use of force.

17. Having now been seriously injured by the electrical injury, Melvindale fire was called to the scene to attend to the Plaintiff. While now clearly under arrest, cuffed and under control and without any ability be to threatening, Furman continued his over aggression and retaliation grabbing Plaintiff by his hair and pounding his head several times into the back of the fire truck. Plaintiff verbally objected to Furman's illegal treatment.
18. At no point, despite clear opportunities to intervene to prevent further harm to Plaintiff, did Defendant Rahman prevent Furman's continuing pattern of illegal infliction of physical, verbal and mental harm upon the Plaintiff.
19. In an effort to cover up for his illegal actions Furman drafted a fictionalized version of the events in his report. Furman first claimed in his report that Plaintiff grabbed his taser 2 times. This is a lie. Second, Furman claimed in his report he observed the Plaintiff's "right arm lowering toward the front of seat." Again, this is belied by the body cam footage. Third, Furman then claims the Plaintiff refused to put his hands on the roof. This is yet another lie. Fourth, Furman claims when tasing Plaintiff Plaintiff is struggling with him and

Rahman. This is another lie designed to attempt to cover up his illegal use of the taser. Once again Furman claims Plaintiff grabbed his taser. This is belied by the body cam. Fifth, Furman admits to grabbing Plaintiff's hair but fails to memorialize how he banged Plaintiff's head into the back of the fire truck. This is a willful omission knowing such use of force to be totally unjustified. As depicted on Furman's body cam when Furman is pounding Plaintiff's head into the back of the fire truck Plaintiff is contained and handcuffed with his hands behind his back. Further, Furman does this in Rahman's presence even though Rahman's mere presence is a show of force. Although Rahman is present during that time, he still makes no effort to intervene to prevent the harm Furman is inflicting on Plaintiff.

20. Plaintiff repeatedly verbally objected to how he was being treated through the traffic stop and Furman repeatedly yelled at Plaintiff in response. Furman's tirade poured over in his mistreatment of Plaintiff's girlfriend as can be seen and heard on his body cam.
21. The conduct of the Individual Defendants:
  - a. Used excessive force against Plaintiff in violation of Plaintiff's 4<sup>th</sup> and 14<sup>th</sup> Amendment rights;

- b. Defendants, in violation of the 1st Amendment, wrongfully retaliated against the Plaintiff whose protest against Furman's criminal conduct toward him was protected by the 1<sup>st</sup> Amendment.
  - c. Made Plaintiff's condition worse after taking him into their custody and control by alleging to false facts in his report in violation of MCL 750.411a, himself committing a crime;
  - d. Failed to properly assure the safety of Plaintiff when he was in their care;
  - e. Intentionally caused serious emotional distress;
  - f. Unlawfully searched Plaintiff's vehicle;
  - g. Wrongfully handcuffed and arrested Plaintiff Williams, without probable cause. For crimes he did not commit;
  - h. Wrongfully issued misdemeanor citations to Plaintiff without probable cause.
25. As a direct and proximate result of the Defendants' conduct, the Plaintiff suffered injuries and damages including, but no limited to:
- a. Economic damages, past and future;
  - b. Pain and suffering, physical injury;
  - c. Loss of society and companionship;
  - d. Fear, anxiety, humiliation; and shame;

- e. Serious emotional distress; and

**WHEREFORE**, Plaintiff claims judgment against Defendants in the amount in excess of Seventy-Five Thousand Dollars (\$75,000) which is fair and just and consistent with the law and evidence as shall be determined, together with interest, costs and attorney's fees, and all other damages, including exemplary and/or punitive damages.

**COUNT I**  
**GROSS NEGLIGENCE**

- 26. Plaintiff re-alleges all prior paragraphs.
- 27. Individual Defendants owed Plaintiff a duty of care, including but not limited to a:
  - a. Duty to provide protection for Plaintiff when he was in a helpless condition;
  - b. Duty not to make Plaintiff's condition worse after taking him into their custody and control;
- 28. The actions of the Individual Police Defendants wantonly and recklessly, in gross negligence, violated the duties to Plaintiff and disregarded Plaintiff's rights.

29. The Individual Police Defendants' actions were done with gross negligence while denying Plaintiff's rights causing loss of rights and injury to the Plaintiff.

30. The Individual Police Defendant's actions were done in wanton, reckless and callous disregard to Plaintiff's rights and to the injury to Plaintiff and was grossly negligent.

31. Under MCL 691.1407, citizens may maintain an action in tort against police officers whose actions constitute gross negligence and state granted immunity does not bar such a claim even when the officer is acting within the scope of his or her authority.

32. As a direct and proximate result of the Individual Police Defendants' actions, Plaintiff suffered injury and damages including those set forth in paragraph 25.

**WHEREFORE**, Plaintiff claims judgment against Individual Defendants in the amount in excess of Seventy-Five Thousand Dollars (\$75,000) which is fair and just and consistent with the law and evidence as shall be determined, together with interest, costs and attorney's fees, and all other damages, including exemplary and/or punitive damages.

**COUNT II**  
**PLAINTIFF WILLIAMS' CLAIM OF ASSAULT AND BATTERY AND**  
**FALSE ARREST AGAINST INDIVIDUAL DEFENDANTS**

33. Plaintiff hereby re-alleges and incorporates herein by reference all of Paragraphs, as though the same were fully set forth herein word for word.

34. Individual Defendants were at all times relevant hereto performing ministerial-operational duties which did not involve significant decision-making, personal deliberation or judgment.

35. The minor decision making involved in Individual Defendants' actions at all times relevant hereto were merely incidental to the execution of said Individual Police Defendants' ministerial-operational duties.

36. At all times relevant hereto, Plaintiff had the right under statutes, common law, rules, regulations and/or ordinances of the State of Michigan, to be free from the negligent, reckless, knowingly and/or intentionally tortuous, willful, wanton, reckless and/or grossly negligent execution of ministerial-operational duties contrary to the Michigan law and Michigan Constitution, by Individual Defendants.

37. At all times relevant hereto, Individual Defendants failed, notwithstanding their standard duty of due care to execute their said ministerial-operational duties in good faith, without negligence, recklessness, willfulness, wantonness, gross negligence and/or knowingly and/or intentional tortuous conduct, in a manner consistent with the Michigan law, as follows, but not limited hereto:

- a. to act in good faith, while investigating Plaintiff Williams;
- b. to act in good faith, while arresting Plaintiff Williams without probable cause and issuing misdemeanor citations to Plaintiffs.
- c. to comply with all applicable statutes, laws, rules, regulations and/or ordinances, including but not limited to the Michigan laws and Constitution.

38. Notwithstanding these duties, Individual Defendants, knowingly and intentionally while acting under color of law, violated, breached and/or failed to fulfill their ministerial duties to Plaintiff in a manner violative of the Michigan Constitution and laws, by acting in bad faith and engaging in ultra vires conduct.

39. Notwithstanding these duties, Individual Defendants knowingly failed to fulfill their ministerial duties while on duty and acting in the course of their employment and/or authority, under color of law and pursuant to customs, policies and/or practices.

40. Notwithstanding these duties Individual Defendants deliberately, recklessly, willfully, wantonly, knowingly and/or intentionally violated, breached and failed to fulfill his ministerial duties to Plaintiff, in bad faith, and in violation of the Michigan laws, including, but not limited to, the following:

- a. by assaulting and battering Plaintiff Williams;
- b. by intentional unlawful offer of corporal injury to Plaintiff Williams by force, or force unlawfully directed toward the person of Plaintiff, under circumstances which created a well-founded

apprehension of imminent contact, coupled with the apparent present ability to accomplish the contact;

- c. by the willful and harmful or offensive touching of Plaintiff which results from an act intended to cause such contact; and,
- d. by the false arrest of Plaintiff Williams without probable cause and issuance of false misdemeanor citations to Plaintiff.

41. As a direct and a proximate result of Individual Defendants' aforesaid reckless, willful, wanton, and knowingly and intentionally tortious violations of the aforesaid ministerial duties, in bad faith and violation of the Michigan laws, Plaintiff was injured.

42. As a direct and a proximate result of Individual Defendants' aforesaid reckless, willful, wanton, and knowingly and intentionally tortious violations of the aforesaid ministerial duties, all done in bad faith, Plaintiff suffered and continues to suffer serious and permanent personal injuries, including physical and mental pain, mental anguish, severe emotional distress, shock, fright, humiliation, degradation, embarrassment, loss of enjoyment of life, medical complications and a lesser leaning, liking and ability towards previous home, family, social, recreational and personal activities, all past, present and future, and any other damages listed in paragraph 25.

**WHEREFORE**, Plaintiff claims judgment against Individual Defendants in the amount in excess of Seventy-Five Thousand Dollars (\$75,000) which is fair and just and consistent with the law and evidence as shall be determined,

together with interest, costs and attorney's fees, and all other damages, including exemplary and/or punitive damages.

**COUNT III**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

43. Plaintiff hereby re-alleges and incorporates herein by reference all of Paragraphs, as though the same were fully set forth herein word for word.

44. At all times relevant hereto Individual Defendants notwithstanding their standard duty of due care, owed to Plaintiff the following duties, among others:

- a. to refrain from inflicting intentional emotional distress on Plaintiff, in bad faith;
- b. to refrain from subjecting Plaintiff to threats of violence in bad faith;
- c. to refrain from subjecting Plaintiff to emotional distress through assault and battery, and further threats which were also assaults;
- d. to refrain from treating Plaintiff in an extremely and outrageously abusive manner by alleging false facts in his arrest report;

45. Individual Defendants' willfully, wantonly, recklessly, knowingly and/or intentionally breached one or more of said duties by, among other things:

- a. recklessly, wantonly and/or intentionally, in bad faith, inflicting emotional distress upon Plaintiff, by wrongfully assaulting and battering Plaintiff;

- b. recklessly, wantonly, and/or intentionally, in bad faith, subjecting Plaintiff to undue and unlawful assault and battery;
  - c. recklessly, wantonly and/or intentionally, in bad faith, subjecting Plaintiff to injury and pain resulting from assault and battery;
  - d. recklessly, wantonly, and/or intentionally, in bad faith, treating Plaintiff in an extremely and outrageously abusive manner.
46. As a direct and a proximate result of said reckless, willful, wanton, knowing and/or intentional misconduct, all done in bad faith, by Individual Defendants, Plaintiff suffered and continues to suffer personal injuries, including, physical and mental pain, serious mental anguish, serious emotional distress, shock, fright, humiliation, degradation, embarrassment, loss of enjoyment of life, and a lesser leaning, liking and ability towards previous home, family, social, recreational and personal activities, all past, present and future, as well as any other damage listed in paragraph 25.

**WHEREFORE**, Plaintiff claims judgment against Individual Defendants in the amount in excess of Seventy-Five Thousand Dollars (\$75,000) which is fair and just and consistent with the law and evidence as shall be determined, together with interest, costs and attorney's fees, and all other damages, including exemplary and/or punitive damages.

**COUNT IV**  
**42 USC 1983**  
**PLAINTIFF WILLIAMS' CLAIMS OF UNREASONABLE SEARCH**  
**AND SEIZURE AGAINST INDIVIDUAL DEFENDANTS**

47. Plaintiff Williams hereby re-allege and incorporate herein by reference all of the prior paragraphs, as though the same were fully set forth herein word for word.
48. The Individual Defendants' actions were done in their individual capacities, and under color of state law.
49. Plaintiff Williams had a clearly established constitutional right to be secure in his person and property and free from unreasonable search and seizure thereof.
50. The Individual Defendants' actions violated clearly established rights of the Plaintiff including but not limited to:
- a) The right to be free from unlawful search/seizure of his vehicle, and unlawful seizure and search of his person and property (4<sup>th</sup> Amendment and 14<sup>th</sup> Amendment);

WHEREFORE, Plaintiff claims judgment against Defendants in the amount in excess of Seventy-Five Thousand Dollars (\$75,000) which is fair and just and consistent with the law and evidence as shall be determined, together with interest, costs and attorney fees, and all other damages, including exemplary and/or punitive damages.

**COUNT V**  
**42 USC 1983**  
**PLAINTIFF WILLIAMS' CLAIM OF EXCESSIVE/UNREASONABLE**  
**FORCE AGAINST INDIVIDUAL DEFENDANTS**

50. Plaintiff Williams hereby re-alleges and incorporates herein by reference all of the prior paragraphs, as though the same were fully set forth herein word for word.

51. The Individual Defendants' actions were done in their individual capacities, and under color of state law.

52. Plaintiff had a clearly established constitutional right to be safe and secure from excessive or unreasonable force by police officers.

53. The Individual Defendants' actions violated clearly established rights of the Plaintiff including but not limited to:

a) The right to be free from the use of excessive or unreasonable force (4<sup>th</sup> Amendment and 14<sup>th</sup> Amendment);

54. As a direct and proximate result of the Individual Defendants' actions, Plaintiff suffered injury and damages including, but not limited to those set forth in paragraph

WHEREFORE, Plaintiff claims judgment against Defendants in the amount in excess of Seventy-Five Thousand Dollars (\$75,000) which is fair and just and consistent with the law and evidence as shall be determined, together with interest, costs and attorney fees, and all other damages, including exemplary and/or punitive damages.

**COUNT VI**  
**42 USC 1983**  
**PLAINTIFFS' CLAIM OF 1<sup>st</sup> AMENDMENT RETALIATION FOR**  
**PROTECTED SPEECH AGAINST INDIVIDUAL DEFENDANTS**

55. Plaintiff Williams hereby re-alleges and incorporates herein by reference all of the prior paragraphs, as though the same were fully set forth herein word for word.
56. The Individual Defendants' actions were done in their individual capacities, and under color of state law.
57. Plaintiffs had a clearly established constitutional right to be free from retaliation by police officers.
58. The Individual Defendants' actions violated clearly established rights of the Plaintiff including but not limited to:
- a) The right to be free from retaliation for protected speech (1st Amendment);
59. As a direct and proximate result of the Individual Defendants' actions, Plaintiff suffered injury and damages including, but not limited to those set forth in paragraph 25.

WHEREFORE, Plaintiff claims judgment against Defendants in the amount in excess of Seventy-Five Thousand Dollars (\$75,000) which is fair and just and consistent with the law and evidence as shall be determined, together with interest, costs and attorney fees, and all other damages, including exemplary and/or punitive damages.

**COUNT VII**  
**42 USC 1983**  
**MUNICIPAL LIABILITY AGAINST DEFENDANT CITY OF**  
**MELVINDALE**

60. Plaintiff incorporates by reference the allegations set forth in the paragraphs above, as if fully set forth herein.
61. At all times herein, Defendant CITY OF MELVINDALE, with deliberate indifference to the constitutional rights of the Plaintiff and other similarly situated individuals, established, condoned, promulgated, implemented, and maintained the following customs, policies, and/or practices that were a proximate cause and a moving force in violations of the Plaintiff's rights under the United States Constitution:
  - (a) Routinely conducting false arrests, false imprisonments, wrongful seizures, retaliation for protected speech and/or unlawful use of force without reason or justification;
  - (b) Routinely concealing, covering up, and hiding evidence of wrongdoing by law enforcement officers employed by the Defendant City of Melvindale;

- (c) Failing to adequately train, supervise, and/or discipline law enforcement officers and supervisors with regard to the appropriate and necessary bases for a lawful seizure and/or use of force;
- (d) Hiring and/or retaining as law enforcement officers and supervisors, certain persons whom the Defendant City of Melvindale knew or had actual notice of unlawful seizure and/or use of force without reason or justification;
- (e) Failing to intervene when it knew of improper continuation of use of excessive force;
- (f) Ratifying, condoning and/or permitting the conduct of Individual Police Defendants.

62. Each of the aforementioned customs, policies, or practices was known to Defendant City of Melvindale as highly likely and probable to cause violations of the United States Constitutional rights of Plaintiff and other individuals, each was a moving force in the violations of the Plaintiff's United States Constitutional rights, as set forth herein.

63. As a direct and proximate result of the actions taken by the Defendants, as discussed more fully above, the Plaintiff has suffered severe damages, including, but not limited to those listed in paragraph 25.

WHEREFORE, Plaintiff claims judgment against Individual Police Defendants in the amount in excess of Seventy-Five Thousand Dollars (\$75,000) which is fair and just and consistent with the law and evidence as

shall be determined, together with interest, costs and attorney fees, and all other damages, including exemplary and/or punitive damages.

**JURY DEMAND**

**NOW COMES** the Plaintiff and demands trial of his cause by jury.

Respectfully submitted,

/s/David A. Robinson  
David A. Robinson (P38754)  
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Southfield, Michigan 48076  
248-423-7234  
davidrobinsonlaw@gmail.com

Date: January 27, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the online filing system which will send notification of such filing to the attorneys of record.

Respectfully submitted,

/s/David A. Robinson  
David A. Robinson (P38754)  
28145 Greenfield Rd, Suite 250  
Southfield, Michigan 48076

Date: January 27, 2025

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