

3. On April 22, 2018 at approximately 3:12 a.m., the plaintiff was in the processing room of the detention facility at New Haven Police Headquarters, having been transported there following his arrest earlier that evening on a charge of Breach of Peace Second, a Class B misdemeanor.

4. At that time and place, defendants Luna, Pressley, Howze, Bright and Curry, each of whom was armed and wearing a utility belt, were also in that room.

5. At that time and place, the plaintiff, Kijana Cornelius, who was unarmed and having been frisked, stood at a designated line, with his legs spread, his arms outstretched, and his hands placed against “the fence”, as instructed by defendant Clayton Howze.

6. At that time and place, defendant Nikki Curry approached Mr. Cornelius and angrily instructed him to “shut up.”

7. At that moment, Mr. Cornelius, his left arm extended with his left palm flat against the fence, removed his right hand from the fence and, with his arm right outstretched, his hand open and flexed at the wrist, gestured to defendant Curry.

8. At that moment, defendant Curry, forcibly grabbed Mr. Cornelius' right hand, whereupon defendant Howze grabbed Mr. Cornelius, as did defendant Pressley, and the three officers, together, violently threw the plaintiff, face first, to the floor.

9. While lying prone with his face to the floor, his hands cuffed behind his back and surrounded by the defendants, the plaintiff, Kijana Cornelius was lifted from the floor by the handcuffs, causing him to suffer further injury.

10. As a result of being grabbed and violently thrown to the ground and then lifted from the floor by the handcuffs, the plaintiff, Kijana Cornelius sustained severe, painful and permanent injuries consisting of a shock to his nervous system, a displaced scaphoid waist fracture of the right wrist, facial abrasions, abrasion to the left nasal bridge, abrasion to the left scalp. Those injuries have caused him and will cause him pain and suffering, mental distress, and anxiety, and have caused him and will cause him to limit his activities.

11. As a result of those injuries, the plaintiff, Kijana Cornelius has incurred and will incur expenses for emergency medical care, diagnostic imaging and testing, physical examination, surgery, physical therapy, medication, and transportation.

12. The conduct of defendants Curry, Howze, and Pressley, as described herein, amounted to the use of excessive force, in violation of Mr. Cornelius' right under the fourth amendment to the United States Constitution and Article First, §7 of the Constitution of the State of Connecticut to be free from unreasonable searches and seizures.

13. Officers Luna and Bright, who stood by and watched passively as defendants Curry, Howze, and Pressley swarmed Mr. Cornelius, threw him violently to the ground, and then lifted him from the ground by the handcuffs, failed to intervene to prevent Mr. Cornelius from being assaulted.

14. At the time of the events described herein, defendants Curry, Howze, Pressley, Luna and Bright acted in concert to deprive Kijana Cornelius of the rights, privileges and immunities secured to him by Title 42 of the United States Code, Sections 1981, 1983 and 1988.

THE PLAINTIFF CLAIMS DAMAGES AS FOLLOWS:

The plaintiff, Kijana Cornelius claims:


1. Compensatory damages in an amount greater than Two Hundred Fifty Thousand (\$250,000.00) Dollars;
2. Punitive damages;
3. Attorneys fees.

THE PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY.

Dated at New Haven, Connecticut this 23rd day of July, 2020.

THE PLAINTIFF,

BY:



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