

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ARNOLD R. JULIEN, )  
)  
*Plaintiff,* )  
) No. 02 CV 4932  
-vs- )  
) (*Judge Pallmeyer*)  
CITY OF CHICAGO and )  
CHICAGO POLICE OFFICERS )  
ERIK B. JOHNSON, #16392 and )  
BRODERICK JONES, #17432, )  
)  
*Defendants.* )

**COMPLAINT**

Plaintiff, by counsel, allege as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this court is conferred by 28 U.S.C. §1343.
2. Plaintiff Arnold R. Julien is a resident of the Northern District of Illinois.
3. Defendant CITY OF CHICAGO is an Illinois municipal corporation.
4. Defendants ERIK B. JOHNSON, #16392 and BRODERICK JONES, #17432 were at all times relevant acting under color their authority as Chicago police officers.
5. On July 14, 2000, defendants JOHNSON and JONES arrested plaintiff and caused plaintiff to be charged with a criminal offense. Defendants JOHNSON and JONES fabricated the evidence on which they made this arrest and did not have a lawful basis on which to make this arrest.

6. Thereafter, defendants JOHNSON and JONES concealed defendant's innocence of any criminal wrongdoing from the prosecutors and thereby caused plaintiff to be held in custody for 14 months awaiting trial.
7. Plaintiff was acquitted of all charges within one year immediately preceding the filing of this action.
8. Defendants JOHNSON and JONES committed the misconduct referred to above as the result of the deliberate indifference of defendant City of Chicago to the fabrication of evidence by its police officers.
9. As the direct and proximate result of the above described acts, plaintiff was deprived of rights secured by the Fourth and Fourteenth Amendment to the Constitution of the United States and subjected to the Illinois tort of malicious prosecution.
10. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that judgment be entered in his favor and against defendants in an amount in excess of one hundred thousand dollars as compensatory damages and against defendants JOHNSON and JONES in the amount of one hundred thousand dollars as punitive damages.

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