

PARTIES

1. Plaintiff Malachi Ritscher is a citizen of the United States.
2. Defendants Angsten and Ross were, at all time relevant to this case, employed as police officers with the Chicago Police Department acting within the scope of their employment with the Chicago Police Department.
3. Defendant City of Chicago is a municipal corporation, duly incorporated under the laws of the State of Illinois, and is the employer and principal of the Defendant police officers.
4. The Defendants were at all times material to this Complaint acting under the color of law.

STATEMENT OF FACTS

5. On March 19, 2005, Malachi Ritscher participated in a demonstration opposing the war in Iraq.
6. The Plaintiff was lawfully exercising his first Amendment rights to oppose the war on Iraq.
7. As the Plaintiff was in the area of Chicago and Michigan Avenues, Defendants Angsten and Ross arrested him.
8. Defendants Angsten and Ross falsely arrested the Plaintiff, since they knew that the Plaintiff had not committed any crime.
9. As a result of the false arrest, the Plaintiff was held in custody on March 19, 2005 and charged with disorderly conduct.
10. The Plaintiff was forced to post a bond and appear in court on April 14, 2005 at 9:00 a.m.
11. The Defendants knew that the arrest of the Plaintiff was made without probable cause. All defendants had a duty to determine whether there was probable cause to justify the arrest and detention of Plaintiff, had a duty to act to prevent the prosecution, had a duty to testify truthfully in their reports, had opportunities to act to prevent the prosecution and prevent the injuries and harm to the Plaintiff and in fact, engaged in specific acts and omissions, as more fully set forth above, calculated and intended to result in the continued prosecution of plaintiff.
12. Defendants reached a meeting of the minds and agreed to cause Plaintiff to be criminally charged, to falsify reports, to withhold information