

which would have resulted in the dismissal of criminal charges and the release of the Plaintiff in order to cover up the misconduct of the Defendants as more fully set above.

13. Defendants, acting both individually, jointly, and in conspiracy, directly and proximately caused the false arrest, pretrial detention and malicious prosecution of Plaintiff by the misconduct of Defendants, as set forth more fully above.

14. The acts and omissions of Defendants, as set forth more fully above, were wanton and willful.

15. The Defendants' false arrest, and malicious prosecution of Plaintiff directly resulted in Plaintiff's damages as set forth in more detail below.

16. Moreover, the Plaintiff has been severely traumatized as a result of defendants' actions. The Plaintiff suffered a loss of liberty for a crime he did not commit, and experienced mental distress and anguish, experienced a lack of enjoyment in life, and was prevented from going about his regular business during his period in custody.

COUNT I

(Plaintiff Ritscher's Claim for Civil Conspiracy Section 1983 Defendants Angsten and Ross)

17. Plaintiff realleges paragraphs 1-16 with the same force and effect as if fully set forth herein.

18. Defendants Angsten and Ross falsely stated that the plaintiff refused to disperse after being given a lawful order to do so. On the basis of these false allegations the Plaintiff was illegally arrested without probable cause and falsely charged. As a result of the Defendant's false allegations and resulting illegal arrest without probable cause, the Plaintiff was detained and held in custody on March 19, 2005. The Plaintiff was forced to appear in court. These actions by the Defendants constitute false arrest and imprisonment under the Fourteenth Amendment and the Fourth Amendment and the right to be free of unreasonable seizures.