19. Defendants together reached an understanding, engaged in a course of conduct, and otherwise jointly acted and/or conspired among and between themselves to falsely arrest and maliciously prosecute Plaintiff in violation of the Fourth and Fourteenth Amendments in order to cover-up their unjustified arrest of plaintiff.

20. In furtherance of this conspiracy, the Defendants named above committed the overt acts set forth above, including, but not limited to, the wrongful arrest, incarceration, charging and malicious prosecution of Plaintiff; the creation and filing of false, fabricated, and incomplete statements and reports; the withholding of information which would have led to the dismissal of criminal charges and the release of Plaintiff.

21. Said conspiracy and overt acts were and are continuing in nature.

22. Defendants' acts as set forth above in acting jointly and/or conspiring together to maliciously prosecute Plaintiff were wanton and willful and constitute the tort of conspiracy.

23. This conspiracy proximately caused the injuries to the Plaintiff set forth above.

WHEREFORE, Plaintiff requests that this Court award him substantial money damages to compensate for the injuries caused by the Defendants' intentional or reckless, and illegal acts; and since Defendants' actions were malicious, willful and/or wanton Plaintiff demands punitive damages plus the costs of this action and attorney fees.

COUNT II
(Plaintiff's Pendant State Claim for Malicious Prosecution Defendants Angsten and Ross)

24. Plaintiff realleges paragraphs 1-23 with the same force and effect as if fully set forth herein.

25. The Defendants individually, jointly, and in conspiracy, maliciously and without probable cause caused the false charging and prosecution of Plaintiff for the fabricated charge of disorderly conduct. Defendants conspired to prepare a case report that falsely identified the Plaintiff as the person who committed disorderly conduct.

26. The prosecution of Plaintiff was terminated in his favor.

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