



**SUMMONS AND
 RETURN OF SERVICE**

CASE NO.
Date Served
Date in Law Dept 5/7/10

COURT
 ADDRESS: 2 WOODWARD AVENUE, DETROIT, MICHIGAN 48226

COURT
 TELEPHONE NO. (313) 224-

THIS CASE ASSIGNED TO JUDGE: **Gershwin A. Drain** Bar Number: 12937

PLAINTIFF

DEFENDANT

MARKOE, TARYN

VS

TRENHELLA, THOMAS

PLAINTIFF'S ATTORNEY

Romano, Daniel G.
 (P-49117)
 26555 Evergreen Rd Ste 1500
 Southfield, MI 48076-4257
 (248) 750-0270

10 PCT
12000 Livernois
Detroit MI
48206

| | | |
|-----------------|----------------------|---------------------|
| CASE FILING FEE | | JURY FEE |
| Paid | | Paid |
| ISSUED | THIS SUMMONS EXPIRES | DEPUTY COUNTY CLERK |
| 04/27/2010 | 07/27/2010 | Felicia Reid |

*This summons is invalid unless served on or before its expiration date. Cathy M. Garrett - Wayne County Clerk

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

- You are being sued.
 - YOU HAVE 21 DAYS after receiving this summons to file an answer with the court and serve a copy on the other party or to take other lawful action (28 days if you were served by mail or you were served outside this state).
 - If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
- There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in _____ Court.
- There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.
- An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in _____ Court.

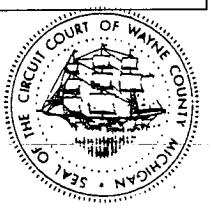
The docket number and assigned judge of the civil/domestic relations action are:

| | | |
|------------|-------|---------|
| Docket no. | Judge | Bar no. |
| | | |

The action remains is no longer pending.

I declare that the complaint information above and attached is true to the best of my information, knowledge, and belief.

Date _____ Signature of attorney/plaintiff _____



COMPLAINT IS STATED ON ATTACHED PAGES. EXHIBITS ARE ATTACHED IF REQUIRED BY COURT RULE.

If you require special accommodations to use the court because of disabilities, please contact the court immediately to make arrangement.



**SUMMONS AND
RETURN OF SERVICE**

Date Served 5/6/10
Date in Law 5/18/10

COURT
ADDRESS: 2 WOODWARD AVENUE, DETROIT, MICHIGAN 48226

COURT
TELEPHONE NO. (313) 224-

THIS CASE ASSIGNED TO JUDGE: **Gershwin A. Drain**

Bar Number: 12937

PLAINTIFF

DEFENDANT

MARKOE, TARYN

VS

PLAYER, DAMEON

PLAINTIFF'S ATTORNEY

Romano, Daniel G.
(P-49117)
26555 Evergreen Rd Ste 1500
Southfield, MI 48076-4257
(248) 750-0270

10 PCT
12000 Amers
Detroit 48206

| | | |
|-----------------|----------------------|---------------------|
| CASE FILING FEE | | JURY FEE |
| Paid | | Paid |
| ISSUED | THIS SUMMONS EXPIRES | DEPUTY COUNTY CLERK |
| 04/27/2010 | 07/27/2010 | Felicia Reid |

*This summons is invalid unless served on or before its expiration date. Cathy M. Garrett - Wayne County Clerk

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

- You are being sued.
 - YOU HAVE 21 DAYS after receiving this summons to file an answer with the court and serve a copy on the other party or to take other lawful action (28 days if you were served by mail or you were served outside this state).
 - If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
- There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in _____ Court.
- There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.
- An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in _____ Court.

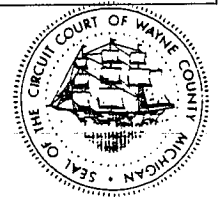
The docket number and assigned judge of the civil/domestic relations action are:

| | | |
|------------|-------|---------|
| Docket no. | Judge | Bar no. |
| | | |

The action remains is no longer pending.

I declare that the complaint information above and attached is true to the best of my information, knowledge, and belief.

Date _____ Signature of attorney/plaintiff _____



COMPLAINT IS STATED ON ATTACHED PAGES. EXHIBITS ARE ATTACHED IF REQUIRED BY COURT RULE.

If you require special accommodations to use the court because of disabilities, please contact the court immediately to make arrangement.

JURY FEE PAID
THIS DATE:
APR 27 2010

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

TARYN MARKOE

Plaintiff,

Case No. 10-
Hon.

NO

vs.

DETROIT POLICE OFFICERS: KEVIN SIMPSON,
DAMEON PLAYER, JASON MURPHY, GERRY DENEAL,
THOMAS TREWHELLA & BENJAMIN WAGNER,
in their individual capacities, Jointly & Severally

Defendants.

FILED
CATHY M. GARRETT
WAYNE COUNTY CLERK
2010 APR 27 A 10:37

ROMANO LAW, P.L.L.C.
BY: DANIEL G. ROMANO (P49117)
CHRISTINA DAVIS (P65098)
Attorney for Plaintiff
26555 Evergreen Road, Suite 1500
Southfield, Michigan 48075
248-750-0270 / fax 248-936-2105

There is no other pending or resolved civil action between these parties or other parties arising out of the Same transaction or occurrence alleged in the complaint.

COMPLAINT

NOW COMES Plaintiff, TARYN MARKOE, by and through his attorneys, ROMANO LAW, PLLC, and complaining against the above-named Defendants, states as follows:

COMMON ALLEGATIONS

1. That Plaintiff is a resident of the County of Wayne, State of Michigan.

LAW OFFICES
ROMANO LAW, PLLC
26555 EVERGREEN, SUITE 1500 • SOUTHFIELD, MICHIGAN 48076 • (248) 750-0270

2. That Defendants are Detroit Police Officers.
3. On September 5, 2009, at approximately 5:30 p.m., Plaintiff and her friend Andrew Dickerson were en route to a wedding.
4. Plaintiff was a passenger in a car driven by Robert Dickerson, who was driving west on I94 and he attempted to merge onto I96 when an unmarked black car rapidly approached his car and began to honk its horn and flash its headlights.
5. Dickerson continued to merge until the black car activated blue and red lights and Dickerson immediately pulled his vehicle to the side of the highway.
6. Two men approached the car with baggy pants, caps worn sideways, visible guns, but no badges or items identifying them as police, Dickerson fearing for himself and his female passenger, Plaintiff pulled away and called 911.
7. The 911 operator told Dickerson that there were no police in the area, so while on the phone a marked car came into view and pulled in front of Dickerson's vehicle.
8. The 911 operator had not yet confirmed that there were police in the area.
9. The officers remained in the marked car, but the guys with the civilian clothes and hats on got out and ran towards Plaintiff and Dickerson with guns drawn and STILL no badges visible.
10. Dickerson again pulled away until he had confirmation that the car was an unmarked police car.
11. The two cars boxed him in as he pulled over.

12. The plain clothes men ran towards Plaintiff's car with guns drawn, Dickerson put his hand in the air and Defendants ripped his door open , unlocked Dickerson' belt and threw him to the ground
13. That Defendants approached Plaintiff, a 5'2", 100 lb, female, put a gun to her head, yanked her out of the car, handcuffed her, threw her to the ground, slammed her head against the car.
14. Defendants then arrested Plaintiff and taken in handcuffs to Detroit Receiving Hospital. While being led through the hospital, beaten, bruised, bloodied and humiliated, Plaintiff was told by one of the officers that she and Andrew had "messed up his plans to ride his bike in Canada and now he was gonna have to go home and smoke".
15. After the hospital, Plaintiff was taken to the 10th Precinct, he impounded the car, even though she was not charged, and she was released several hours later o fend for herself, without her house keys in a unfamiliar Detroit neighborhood dressed for a wedding at night.
16. Neither Plaintiff or her boyfriend HAVE EVER DONE ANYTHING ILLEGAL and she believes this may have been racially motivated as she is African American and her boyfriend is Caucasian, indeed one of the white officers at the scene asked Andrew why he was "f---king a n-gg-r".
17. This is an outrageous case of police misconduct, racial intimidation and extreme and outrageous conduct by Defendants, sworn police officers, who act and speak more like criminals.

18. That Defendants were belligerent, unreasonable and malicious in dealing with PLAINTIFF, an innocent woman.

19. That the amount in controversy exceeds Twenty-Five Thousand Dollars or is otherwise within the jurisdiction of this court.

COUNT I:
SECTION 1983 AGAINST INDIVIDUALS, 4th and 14th AMENDMENT.

Plaintiff incorporates each of the Common Allegations as though fully stated herein.

20. That 42 USC Section 1983 provides for civil liability for deprivation of any right, privileges and immunities carried by the constitution and laws of the United States and the State of Michigan.

21. That at all times material herein, Defendants were acting under color of law.

22. That at all times material herein, said Defendants subjected Plaintiff to deprivation of his rights, privileges and immunity secured by the Constitution of the United States and, more specifically, Amendments 4 and 14 of the laws of the United States and the State of Michigan.

23. That the above referred to customs and practices implemented by Defendants proximately caused the injuries and losses to Plaintiff as alleged herein thereby depriving Plaintiff of his rights, privileges and immunities secured by the United States Constitution and Amendments 4 and 14.

WHEREFORE, Plaintiff demands judgment against Defendants in whatever amount the Plaintiff is entitled together with exemplary and punitive damages, plus interest, costs, and attorney fees.

COUNT II
ASSAULT AND BATTERY

Plaintiff incorporates each of the common allegations contained herein.

24. That Defendants arrested Plaintiff for no reason whatsoever.

25. That Defendants used unnecessary force in detaining Plaintiff and placing him in the police squad car.

WHEREFORE, Plaintiff demands judgment against Defendants in whatever amount the Plaintiff is entitled together with exemplary and punitive damages, plus interest, costs, and attorney fees.

COUNT III
FALSE ARREST

That Plaintiff incorporates each of the common allegations contained herein.

26. That by reason of the wrongful acts of Defendants, Plaintiff was falsely arrested and/or detained.

WHEREFORE, Plaintiff demands judgment against Defendants in whatever amount the Plaintiff is entitled together with exemplary and punitive damages, plus interest, costs, and attorney fees.

COUNT IV
FALSE IMPRISONMENT

That Plaintiff incorporates each of the General Allegations contained herein.

27. That by reason of the wrongful acts of Defendants, Plaintiff was falsely imprisoned.

WHEREFORE, Plaintiff demands judgment against Defendants in whatever amount the Plaintiff is entitled together with exemplary and punitive damages, plus interest, costs, and attorney fees.

COUNT V
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

That Plaintiff incorporates each of the General Allegations contained herein

28. That Defendants extreme and outrageous acts leading up to and including Plaintiff's arrest, attached, or in any way proceeded against, by process or civil or criminal action, or in any other manner prescribed by law and caused emotional distress and physical injury.

WHEREFORE, Plaintiff demands judgment in his favor and against the Defendants in whatever amount Plaintiff is found to be entitled together with costs, interest, and attorney fees

ROMANO LAW, P.L.L.C.

BY: 

DANIEL G. ROMANO (P49117)
Attorney for Plaintiff
26555 Evergreen Road, Suite 1500
Southfield, Michigan 48075
248-750-0270 / fax 248-936-2105

JURY DEMAND

NOW COMES Plaintiff, TARYN MARKOE, by and through her attorneys, DANIEL G. ROMANO, and hereby demands trial by jury.

Respectfully submitted,
ROMANO LAW, P.L.L.C.

BY: 

DANIEL G. ROMANO (P49117)
Attorney for Plaintiff
26555 Evergreen Road, Suite 1500
Southfield, Michigan 48075
248-750-0270 / fax 248-936-2105