

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

V.R. ENTERTAINMENT NETWORK, INC.,
VICKASH MANGRAY, JEFF MANGRAY,
RISHAY “ REESE” MANGRAY,
AND MOONIE MANGRAY,
PLAINTIFFS,

CASE NO: 2:12-cv-10203
HON. PAUL D. BORMAN

vs.

CITY OF ANN ARBOR, CITY OF ANN ARBOR
POLICE DEPARTMENT, CITY OF ANN ARBOR
CHIEF OF POLICE BARNETT JONES, ANN ARBOR
CITY ADMINISTRATOR, STEVE POWERS, ANN ARBOR
CITY ADMINISTRATOR ROGER FRASER, OFFICER
PETER TSANGARIS, OFFICER BRADLEY ROUGEAU,
SERGEANT EARL FOX, SERGEANT CRAIG FLOCKEN,
OFFICER JEFFREY FLYNN, DETECTIVE SERGEANT
DAVID MONROE, OFFICER ROBERT PFANNES,
OFFICER AIMEE METZER, OFFICER DAVID RIED,
SERGEANT MATTHEW LIGE, OFFICER
SCOTT STONER, IN THEIR OFFICIAL AND INDIVIDUAL
CAPACITIES,

DEFENDANTS.

ROGER A. FARINHA (P62269)
ATTORNEY FOR PLAINTIFFS
615 GRISWOLD, SUITE405
DETROIT, MI 48226
(313) 657-6532
roger.farinha@yahoo.com

STEPHEN K. POSTEMA (38817)
ROBERT W. WEST (P31009)
ATTORNEYS FOR DEFENDANT
301 EAST HURON STREET
ANN ARBOR, MI 48104
734-794-6181

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PLAINTIFFS' FIRST AMENDED COMPLAINT AND JURY DEMAND

NOW COME the Plaintiff's, V.R. Entertainment Network, Inc., Vickash Mangray, Jeff Mangray , Rishay (Reese) Mangray and Moonie Mangray, by and through their attorney, ROGER A. FARINHA and complains unto this Honorable Court as follows:

1. Plaintiff V.R. entertainment Network, Inc. ("VR") is a Michigan Corporation transacting business in the County of Washtenaw, State of Michigan, it is operated in the City of Ann Arbor under the style Dream Nite Club.
2. Plaintiff Vickash Mangray, Jeff Mangray, Reese Mangray and Moonie Mangray are owners and managerial operators of VR.
3. At all relevant times herein City Administrators Roger Fraser and Steve Powers exercised general managerial control over the municipal affairs of the City of Ann Arbor.
4. At all relevant times herein Defendant, Barnett Jones served as Chief of Police of the City of Ann Arbor.
5. At all relevant times herein, Officer Peter Tsangaris, Officer Scott Stoner, Sgt. Craig Flocken, Officer Bradley Rougeau, Lt. Robert Pfannes, Officer Aimee Merzer, Sgt. Earl Fox, Detective Sgt. David Monroe, Officer David Ried, and Sgt. Matthew Lige served as law enforcement officers for the City of Ann Arbor as well as employees and agents.
6. The tortious acts and omissions pled herein occurred in Washtenaw County in the State of Michigan and, also, this action involves a "federal question" pursuant to Title 28, Section 1331

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of the United States Code and is otherwise within the jurisdiction of this Honorable Court; venue is proper in the United States District Court for the Eastern District of Michigan.

7. That Plaintiffs are of Asian- Indian descent, born in Trinidad.

8. Since its opening in 2004, VR's patrons are racially diverse and of various racial origins, including blacks, Asians and Latinos.
9. That Defendants administer and enforce state and local laws in the City of Ann Arbor.
10. That VR has marketers who proceed to local universities and other places to book evening events hosted by disc jockeys.
11. That typically events attended by heavily white patrons are scheduled during Thursday evenings, Asian or Indian events are set for Friday nights. Hip-hop events where a large percentage of blacks attend occurs Saturday evenings. The Dream Nite Club is typically only open on those Thursday through Saturday evenings.
12. Officer Vada Murray of the Ann Arbor Police Department visited VR management in 2007 and imparted to them that they have to stop the black-oriented nights, that the Ann Arbor Police Department does not like them.
13. That during administrative liquor inspections and at other times all during the years 2009 until the end of 2011, Defendants, Flynn, Tsangaris, Lige and Stoner would approach peaceful black patrons in VR's place of business and for no reason other than harassment, shine flashlights in their faces in a provocative manner; this was observed to have occurred approximately fifty (50) times by management of VR; frisking or partially uncovering clothing of black patrons was implemented about thirty times from 2009 through 2012, during all three of those years.
14. That during the football season of 2009, near the time of the U-M and Eastern Michigan

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University Icebreaker Party football game, Sgt. Matthew Lige stated in the VR premises to Reese Mangray, VR manager, "Fuck you and fuck these niggers, I will shut this place down." This was said on a Saturday night where the clientele were predominantly black.

15. Officer Aimee Metzger of the AAPD on or about July 6, 2009 came in on a vandalism complaint at the end of a Latino Night (Sunday) and stated, "This bar ain't nothin but a fucking problem with these Mexican customers." This was said aloud as she was departing the bar in a manner intended for the Latino customers to hear it; it was stated in the presence of VR manager Jeff Mangray and security guards Bob Stanton and Tim Lewis.

16. VR by Jeff Mangray its manager complained to Lt. Pfannes, AAPD, Liquor Control Officer, on or about July 28, 2009 about Officer Metzger's statement referencing Mexicans and the reply was if Pfannes stated, "Maybe you should market to a more varied customer base rather than kikes, blacks, and Mexicans."

17. On or about July 20, 2009, Jeff Mangray met with Police Chief Barnett Jones of the AAPD and disclosed that police accosted, harassed, insulted, pepper sprayed and pushed around black customers without justification on a regular basis; Jones also was notified of "Officer Metzgers' comments referenced above about Mexicans. Jeff Mangray also complained that similar harassment was being perpetrated by the AAPD against Latino, Oriental and Asian- Indian clientele of VR.

18. That in approximately October of 2009, Sgt. Earl Fox and Ann Arbor City Councilman, Steve Rapundalo entered the premises of VR, Jeff Mangray told Rapundalo and Sgt. Fox that VR's black clientele were being unfairly targeted on Saturday nights due to their racial background.

19. That in early November of 2009, Nabih Ayad, VR's attorney, Sgt. Jeff Connelly

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(AAPD liaison to L.C.C.) and Chief of Police Barnett Jones and Ayad notified that civil rights violations against blacks were occurring at VR and that VR was considering legal action; Ayad later met with Ann Arbor City Attorney Stephen Postema and imparted the same allegations.

20. That despite the aforesaid communications with city and police officials, the same acts of AAPD harassment continued against VR management and minority patrons, especially blacks and to a lesser, but still significant extent, non-white clientele.

21. That on or about February 28, 2010, Officer Tsangaris came onsite at VR with Sgt. Lige; Tsangaris, in the presence of Sgt. Lige, picked up a black female patron by the waist with no provocation and transported her off the premises and slammed her down on the concrete sidewalk immediately outside the club; Sgt. Lige did not object to the conduct of Tsangaris that he witnessed but instead told VR manager Jeff Mangray that “Its time to close this place down because these black people are becoming hostile.”

22. Approximately, one week later in March of 2010, Jamie Williams, a VR employee who is black, was approached by Sgt. Matt Lige outside the VR premises and made threatening and vulgar comments to her while in a parking lot repeatedly using the words “fuck” of “fucking.”

23. That during the latter part of 2009, during purported liquor inspection, Officer Tsangaris placed an activated flashlight in the face of a black patron on Saturday night without any justification, provoking an exchange of words, and Officers Tsangaris and Flynn picked up the black patron by his feet and shoulders and transported the black patron outside the club.

24. That on or about April 12, 2010, Sgt. Matt Lige sprayed pepper spray without justification or provocation into the face of a black patron who had just left the premises of VR.

25. That on or about June 1, 2010, at a private party, Sgt. Craig Flocken of the AAPD approached a group of approximately twelve black females at VR who were conversing in a

peaceable manner between themselves and proceeded to activate a pepper spray dispenser in their faces with no prior provocation, causing the girls to start screaming in pain; VR

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management used water in rags to attempt to aid the black girls; none of the twelve girls were arrested by the AAPD and EMS intervention was requested.

26. That on June 2, 2010, Sgt. Craig Flocken also activated a taser and shocked a female black patron without provocation or justification.

27. That on or about August 20, 2010, Lt. Pfannes of the AAPD came to the VR premises with Sgt. Lige and stated, "I am here to close this nigger bar down." Lige made substantially similar racially toned statements at this time to VR manager, Reese Mangray.

28. That during administrative liquor inspections, and at other times all during the years 2009 through 2012, the AAPD would use foul, offensive and racially-toned language to Plaintiffs that were onsite at VR's premises; Reese Mangray was stabbed offsite and the AAPD failed to reasonably investigate the incident or seek any criminal prosecution unlike other felony investigations in Ann Arbor; this was due to racial and/or national origin animus.

29. That all during the years 2009 through 2012, the AAPD, through Sgt. Lige, Flynn and Stoner came onto the premises of VR and literally pushed or shoved black patrons without justification or provocation at least fifty (50) times. .

30. That the AAPD also deployed a regular presence of squad cars in front of the VR premises, as many as twelve (12) at a time, but more often five or six on Saturday nights, during events where a large percentage of the clientele was black; the police often in these squad cars would harass blacks as they were leaving the VR premises by accosting them pushing them, and/or frisking them without provocation or justification; this was intended, in fact, intimidate the black

patrons and further discourage their patronage..

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31. That often Officer Rougeau of the AAPD stated to VR manager, Reese Mangray “We’ll stop fucking with you if you stop throwing these black parties.” This was said on or about May 31, 2011.

32. That Detective Sgt. Monroe in 2011 stated to Reese Mangray in the presence of Officer Ried, “All you’ve got is a bunch of spicks on Sunday nights in here” during a Latino night function.

33. That on or about March 17, 2012, Sgt. Lige, in referencing the instant federal court action stated to VR manager Reese Mangray, “Add my name to the lawsuit”; Lige also stated, “Fuck you and fuck all these niggers” and challenged Reese Mangray to a fight on the VR premises.

34. That disparate treatment by AAPD of black patrons on Sundays contrasted with Caucasian patrons on Thursdays; it can be evidenced by the fact that Caucasians were generally treated respectfully by the AAPD, no “flashlight” incidents, frisking, use of pepper spray, unclothing, pushing or assaultive or aggressive behavior was demonstrated against Caucasian patrons of VR at any time.

35. That Oriental and Asian Indian clientele of VR would have more AAPD harassment than whites, but it was far less intensive and intrusive than the treatment given to black patrons of VR; no Oriental or Asian Indian patrons of VR were ever subject to a “flashlight” incident, pepper spray attack, frisking, unclothing, and/or tasing, unjustified pushing incidents against Oriental and Asian Indians were less frequent than black patrons and of less severity when occurring, though still at an intolerable rate; There were about ten unjustified pushing incidents against Oriental and Asian Indian clientele during the years 2009-2012.

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36. That Latino clientele of VR would have more AAPD harassment than whites, but it was far less intensive and intrusive than the treatment given to black patrons of VR; Oriental or Asian Indian patrons of VR were subject to unjustified harassment, including “flashlight” incidents

(about 25-30 times), unjustified pepper spray attacks (25-30 unjustified), frisking incidents, unclothing incidents (25-30), unjustified pushing incidents against Latinos and Asian Indians were less frequent than black patrons and of less severity when occurring, though still at an intolerable level.

37. That in July of 2011, Jeff Mangray of VR notified Ann Arbor Fifth Ward City Councilman, Michael Anglin that Dream Nite Club's black clientele were being targeted due to their race through harassing conduct.

COUNT I-VIOLATION OF THE FEDERAL CIVIL RIGHTS ACT OF 1866

(42 USC 1983)

38. That Paragraph One through Thirty-Seven are incorporated herein by reference.

39. That Defendants, acting under color of state law, intentionally deprived Plaintiff's

(A) of their rights guaranteed under the Equal Protection Clause of the Fourteenth

Amendment of the United States Constitution by committing the acts of discrimination on account of race and racial origin against Plaintiff's' black, Asian Indian, Oriental and Jewish clientele and against Plaintiff's themselves, by virtue of the conduct pled above with respect to VR's business;

(B) of Plaintiffs' rights guaranteed under the Due Process Clause of said Fourteenth

Amendment by failing to initiate appropriate remedial measures, but acting with deliberate indifference after learning of ongoing acts of police harassment occurring against the night clubs minority clientele and against Plaintiff's themselves for promoting and

serving a diverse racial and ethnic clientele in Ann Arbor and refusing to adhere to police demands to stop promoting and servicing racial and ethnic minority clientele;

(C) of Plaintiff's liberty interest guaranteed under said Due Process Clause against

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unjustified intrusions of their personal security and the personal security of their racial and ethnic minority clientele;

D) of Plaintiff's liberty interest under said Due Process Clause to be free from other injurious conduct such as having to witness its minority racial and ethnic clientele be systematically and chronically harassed, physically assaulted and verbally abused by the AAPD due to their minority status;

(E) of Plaintiff's Fourth Amendment Rights to be free from unreasonable searches and seizures, false arrest of its minority clientele, warrantless detention of racial customers, excessive force against clientele;

(F) of Plaintiff's Fourteenth Amendment right against arrests of its minority clientele and selective enforcement of statutes or regulations on racial grounds;

(G) of Plaintiff Reese Mangray's rights under the Due Process Clause against deliberate denial of police services;

(H) of rights against arbitrary and discriminatory police conduct established by the Civil Rights Act of 1964.

40. That such misconduct by police, as set forth above was sufficiently severe and frequent to have adversely altered the conditions of the business environment that VR had on its premises.

41. That Defendants City of Ann Arbor, City of Ann Arbor Police Department, Police Chief Barnett Jones, Roger Fraser, Steve Powers, Sergeant Earl Fox, and Lt. Pfannes possessed enough knowledge of the racial and national origin discrimination, other acts of harassment, and

constitutional and statutory violations pled herein that may could have reasonably responded with remedial measures to address the kinds of police misconduct upon which Plaintiffs' claims are based.

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42. That Defendants, City of Ann Arbor, City of Ann Arbor Police Department, Police Chief Barnett Jones, Roger Fraser, Steve Powers, Sergeant Earl Fox and Lt. Pfannes were deliberately indifferent to the aforesaid notice of AAPD misconduct and discriminatory practices where said Defendants' response to said reports was clearly unreasonable in light of known circumstances.

43. That said unreasonable responses by said municipality, its police department and the aforesaid city administrators and police officials were due, at least in part, to a deficient policy and/or custom to address discrimination as well as police misconduct and constitutional and statutory violations flowing therefrom.

44. That as a direct and proximate result of such violations, Plaintiff's have sustained injury and damages including, specifically, mental and emotional distress and injury, loss of corporate profits, embarrassment and humiliation, attorney fees, loss of wages, damage to business reputation and other injury and damage as the proof may show as well as entitling Plaintiff's to an award of exemplary damages and/or punitive damages.

COUNT II-VIOLATION OF 42 USC 1985 (KU KLUX KLAN ACT)

45. That Paragraph One through Forty-Four are incorporated herein by reference.

46. That the unjustified ejection of a black patron of VR in late 2009 following the unjustified shining of a police flashlight in his face by Officer Tsangaris and Officer Flynn, as set forth at Paragraph Twenty-Three, above, was a conspiracy between those officers on behalf of the AAPD for the purpose of depriving, directly or indirectly, that black persons and blacks in general, equal protection of the laws and of equal privileges and immunities under the laws, and also sought to deprive VR, as a licensed liquor license, its ability serve minority clientele and

specifically black clientele in furtherance of its lawful business.

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47. That the facts pled supra, in this at Paragraph 21, 27 and 32 constitute conspiracies by AAPD officers mentioned herein to similarly deprive black persons of the equal protection of the laws and of equal privileges and immunities of the laws;

48. That the constitutional and statutory violations pled supra in this complaint were the direct result of a conspiracy between the law enforcement officers referred at Paragraph Five, supra.

49. That as a direct and proximate cause of said violations of 42 USC 1985 and Plaintiffs' association with black, Latino, Asian, Jewish and oriental patrons, all Plaintiffs have sustained all damages and injuries pled, supra.

COUNT III- VIOLATION OF ELLIOTT-LARSEN CIVIL RIGHTS ACT MCL 37.2701

50. Paragraph, One through Forty-Nine are incorporated herein by reference.

51. VR and its owners/operators and manager who are co-plaintiffs herein have operated a "place of public accommodation" under Section 301 of the Elliott-Larsen Civil Rights Act.

52. The City of Ann Arbor and Ann Arbor Police Department, in the rendition of police services constituted a "public service" under Section 301(b) of the Elliott-Larsen Civil Rights Act.

53. That the Defendants, by virtue of the acts pled above, denied blacks, Latinos, Asian Indians, Orientals, Jews who were patrons of VR full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of a place of public accommodation or public service because of religion, race, color and/or national origin.

54. That VR and its co-plaintiff's in management of VR are and have been fully committed to perform its duties and obligations of non-discrimination under the Elliott-Larsen Civil Rights

Act.

55. That the Defendant law enforcement actions and the City of Ann Arbor and its police

department referenced herein did aid, incite, conjure, compel or coerce VR and its co-plaintiff

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managers herein to violate the equal accommodation rights of blacks, Latinos, Asian Indians, Orientals and Jews by expressly directing them to discourage and/or efforts of serving such minority patrons and indicating that police misconduct and harassment directed at the club end its minority patrons would stop if VR and its co-plaintiff managers stop sponsoring parties and events at which blacks predominantly attended, such a hip-hop nights, in the manner more specifically pled supra herein, said conduct being in violation of CL 37.2701(b).

56. That further, the Defendant law enforcement officers and the City of Ann Arbor and its police department did, by the aforesaid conduct, willfully obstruct or prevent VR and its co-plaintiffs from complaining with equal accommodations provisions of the Elliott-Larsen Civil Rights Act in violation of CML 37.2701(e) in the manner set forth more specifically supra in this complaint.

57. Further, that the Defendant law enforcement officers and the City of Ann Arbor and its police department referenced herein did coerce, intimidate, threaten, or interfere with VR and its co-plaintiff managers by having aided or encouraged blacks, Latinos, Asian Indians, Orientals and Jews in the exercise or enjoyment of their rights granted or protected under Elliott-Larsen Civil Rights Act, as is pled more specifically supra, in this Complaint, all in violation of the MCL 37.2701(f).

58. As a direct and proximate result of said violations of Section 2701 of the Elliott-Larsen Civil Rights Act, all Plaintiffs sustained all damage and injury pled above.

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COUNT IV-VIOLATION OF ELLIOTT-LARSEN MCL

CIVIL RIGHTS ACT AT MCL 37.2302

59. Paragraphs One through Fifty-Eight are incorporated by reference.

60. That the Individual plaintiffs herein, all persons of Asian Indian ancestry, are protected individuals under the Elliott-Larsen Civil Rights Act due to their national origin and color.

61. That by the acts pled herein, supra, Defendant members of the AAPD on behalf of the city of Ann Arbor denied the individual plaintiffs the full and equal enjoyment of the services, facilities, privileges and advantages of the “public service” of police services because of race, color, or national origin, all in violation of MCL 37.2302(a).

62. That by the acts pled, herein, supra, Defendant members of the AAPD on behalf of the City of Ann Arbor published statements that the full and equal enjoyment of police services shall be withheld from, refused or denied the individual plaintiffs or that said plaintiffs’ presence at a place of public accommodation is objectionable, unwelcome, unacceptable or undesirable because of race, color or natural origin, all in violation of MCR 37.2302(b).

63. That as a direct and proximate result of said violations of MCL 37.2302, the individual plaintiffs have sustained injury and damages including, specifically mental and emotional distress and injury, loss of wages, embarrassment and humiliation, attorney fees, damage to business reputation and other injury and damages as the proofs may show as well as entitling plaintiffs to an award of exemplary damages.

COUNT V- INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

64. Paragraphs One through Sixty-Three are incorporated herein by reference.

65. That the Defendants law enforcement officers knew or should have known that the Plaintiffs were ethnically diverse and their club catered to racially and ethnically diverse individuals when

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they “targeted” Asian Indians, blacks, Latinos, and Orientals and singled them out for harassment and were abusive to the individual Plaintiffs for complying with state and federal civil rights laws by hosting these valued and protected minority clientele.

66. That specifically the actions of the Defendant law enforcement officers that are pled at Paragraphs Twelve through Sixteen and Twenty through Thirty-Six of these pleadings constitute the intentional and outrageous acts complained of and were all directed witnessed by at least one of the individual Plaintiffs.

67. That the Defendant law enforcement officers’ behavior was purposeful, deliberate and considered actions targeted to deny Plaintiffs their fundamental rights, to inflict both embarrassment and emotional trauma, constituting an abuse of law enforcement power and discretion.

68. That the Defendant law enforcement officers’ behavior was so extreme and outrageous that it was calculated to induce severe emotional, mental and physical trauma in the Plaintiffs.

69. That the Defendants’ actions have caused severe emotional, mental and physical injury to the Plaintiffs.

WHEREFORE Plaintiff’s VR Entertainment Network, Inc., Vickash Mangray, Jeff Mangray, Moonie Mangray and Rishay “Reese” Mangray respectfully prays that this Honorable Court enter a judgment on their behalf against all Defendants, awards them the following relief.

(a) all general and special damages including exemplary and punitive damages in the amount of Ten Million (\$10,000,000.00) Dollars;

(b) costs, interest and attorney fees;

(c) any other relief deemed just and equitable.

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Respectfully submitted,

/s/ Roger A. Farinha
Roger A. Farinha (P62269)
Attorney for Plaintiffs
615 Griswold, Suite 405
Detroit, MI 48226
(313) 657-6532
FAX (313) 262-6657
roger.farinha@yahoo.com

Dated: July 2, 2012

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UNITED STATES DISTRICT COURT
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Note by Ann Arbor Chronicle: JURY DEMAND

On Aug. 6, 2012, the US District

All Plaintiffs hereby demand a trial by jury as to all issues triable as of right in accordance

Court denied the Plaintiffs'

with Rule 38 of the Federal Rules of Civil Procedure and the Seventh Amendment of the United

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Respectfully submitted,

/s/ Roger A. Farinha
Roger A. Farinha (P62269)
Attorney for Plaintiffs
615 Griswold, Suite 405
Detroit, MI 48226
(313) 657-6532
Fax (313) 262-6657
roger.farinha@yahoo.com

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