

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT

DOCKET NO.: 21-2037

F

ALFRED E. PATTERSON
Plaintiff

VS.

BOSTON POLICE DEPARTMENT,
BOSTON POLICE COMMISSIONER
GREGORY LONG, CITY OF BOSTON,
ACTING BOSTON MAYOR KIM JANEY,
OFFICER JOHN DOE #1 AND OFFICER
JOHN DOE #2,
Defendants

**COMPLAINT AND
REQUEST FOR TRIAL BY JURY**

SUFFOLK SUPERIOR COURT
CIVIL CLERK'S OFFICE
2021 SEP - 7 11P 1:06
MICHAEL JOSEPH DONOVAN
CLERK / MAGISTRATE

PARTIES

1. The Plaintiff, Alfred E. Patterson is an individual with an address of 548 Lafayette Road, Hampton, NH 03842.
2. The Defendant, Boston Police Department is located at One Schroeder Plaza, Boston, MA 02120.
3. The Defendant, Boston Police Commissioner, Gregory Long is the individual in command and control of the Boston Police Department with an office at One Schroeder Plaza, Boston, MA 02120.
4. The Defendant, City of Boston is a municipality with an address of One City Hall Square, #500, Boston, MA 02201.
5. The Defendant, Acting Boston Mayor Kim Janey is the individual in command and control of the City of Boston.
6. The Defendant, Officer John Doe #1 is a Boston Police Officer.
7. The Defendant, Officer John Doe #2 is a Boston Police Officer.

FACTS

8. On or about September 9, 2018, Boston Police Officers John Doe #1 and John Doe #2 were on patrol and responded to a radio call for an assault in progress.
9. The victim was a minor child who had been the target of an attempted kidnapping.

10. The victim's parents were in pursuit of the suspect.
11. The officers were able to secure two acquaintances of the suspect and eventually Max Road Patterson was brought into custody and transported to the Boston Police Department.
12. At the station Max Roads Patterson was positively identified by the victim and her parents.
13. The first Incident Report identifies the suspect as Max Roads Patterson and Max Roads Patterson gave all of his correct identifying information to the Boston Police Department.
14. The second Incident Report completed by Officer John Doe #1 negligently and erroneously identified the suspect/criminal defendant as Alfred E. Patterson despite the fact that Alfred's name does not appear on the III Report.
15. The booking report completed by Officer John Doe #2 negligently and erroneously identifies the suspect/criminal defendant as Alfred E. Patterson despite the fact that Alfred's name does not appear on the III Report.
16. The booking report had Alfred E. Patterson's name and Max Patterson's picture.
17. On September 10, 2018, Alfred E. Patterson was charged with three counts:
 1. Attempt to Commit Kidnapping c. 274 § 6
 2. Enticement of a child under 16 c. 265 § 26 (b)
 3. Furnishing False ID information c. 268 § 34A
18. On September 10, 2018 Max Roads Patterson was physically at the arraignment and explained that Alfred E. Patterson was not his name but rather was his brother.
19. Alfred E. Patterson was completely unaware of any alleged criminal activity nor was he aware that he had been named as a criminal defendant in the case until he saw his face and name all over television.
20. The media (local, regional and notional) used the erroneous information provided in the police report to publicize Alfred E. Patterson's name and likeness as the criminal defendant and suspect in a minor child abduction case.
21. On September 14, 2018 Attorney Paul J. Anthony of Stoneham entered his limited appearance for Alfred E. Patterson (not the actual defendant) and filed a Motion to Expunge the charges wrongly filed against Alfred E. Patterson.
22. On September 17, 2018, Max Roads Patterson's attorney, Patrick J. Colvario filed a Motion to Amend The Defendant's name from Alfred E. Patterson to Max Roads Patterson.

23. The Judge heard the Motions and denied and continued both motions to a later date with instructions for the Boston Police Department to “straighten this out”.
24. During the next two and a half months the Boston Police Department did nothing to correct the knowingly erroneous charges filed against Alfred E. Patterson.
25. Finally on November 29, 2018, Honorable Judge Robert Ronquillo dismissed all charges against Alfred E. Patterson and ordered the case to be expunged and null processed.
26. Max Roads Patterson was determined to be the correct Defendant.
27. Alfred E. Patterson’s name and charges were not expunged from the record until sometime after March 11, 2019.
28. In December 2018 Alfred E. Patterson was arrested in Revere due to a mix-up with Max Roads Patterson’s charges when Revere Police ran his name. Revere Police called him a “weirdo” while referencing charges associated with the minor child abduction.
29. During the incident in Revere, Alfred E. Patterson spent over 6 to 8 hours in a cold jail cell after being put in handcuffs.
30. During the time from September 10, 2018 through the present day, Alfred E. Patterson has wrongfully been associated with the attempted kidnapping of a minor child due to the Boston Police Department’s negligence initially and then their willful, wanton and/or reckless decision to not correct their mistake and dismiss the charges against Alfred E. Patterson.
31. Since September 10, 2018 through the present day, Alfred E. Patterson has been put in handcuffs by multiple police departments and the FBI as a result of the erroneous charges connected to the child abduction case.
32. Alfred E. Patterson is a successful business man in the paving business and the damage to his reputation has caused him to lose millions of dollars in revenue.
33. Alfred E. Patterson has been negatively affected.
34. Alfred E. Patterson’s relationship with the mother of his child has been irreparably damaged.
35. A search of the internet as of the present day still shows Alfred E. Patterson to be a criminal defendant for this horrific and embarrassing crime.
36. On January 20, 2020, the Plaintiff through his attorney sent a Notice of Massachusetts Tort Claim Pursuant to M.G.L. c. 258, Section 4 which was signed for by an employee of the City of Boston.

COUNT I – NEGLIGENCE V. DEFENDANT
BOSTON POLICE DEPARTMENT

37. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 36 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
38. The Defendant Boston Police Department through their agents and/or employees negligently and erroneously charged and filed a criminal complaint against the Plaintiff, Alfred E. Patterson.
39. As a result of the Defendant, Boston Police Department's negligence, Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson demands judgment against the Defendant, Boston Police Department, in the amount which this court deems just and proper plus interest and costs of this action.

COUNT II – NEGLIGENCE V. DEFENDANT
BOSTON POLICE COMMISSIONER GREGORY LONG

40. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 39 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
41. The Defendant Boston Police Commissioner Gregory Long is the person responsible for and in control of the Boston Police Department.
42. As the head of the Boston Police Department, the Defendant, Boston Police Commissioner Gregory Long is responsible for the negligence of his employees and/or agents.
43. As a result of the Defendant, Boston Police Commissioner Gregory Long's negligence, Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Boston Police Commissioner Gregory Long, in the amount which this court deems just and proper plus interest and costs of this action.

COUNT III – NEGLIGENCE V. DEFENDANT
CITY OF BOSTON

44. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 43 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
45. The Defendant, City of Boston is the municipality that employs the Boston Police Department.
46. As the employer of the Boston Police Department, the Defendant City of Boston is responsible for the negligence of its employees and/or agents.
47. As a result of the Defendant, City of Boston's negligence, Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, City of Boston, in an amount, which this court deems just and proper plus interest and costs of this action.

COUNT IV – NEGLIGENCE V. DEFENDANT
ACTING BOSTON MAYOR KIM JANEY

48. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 47 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
49. The Defendant Acting Boston Mayor Kim Janey is the person responsible for and in control of the City of Boston and all of its departments.
50. As the head of the City of Boston, Acting Boston Mayor Kim Janey is responsible for the negligence of its employees and/or agents.
51. As a result of the Defendant, Acting Boston Mayor Kim Janey's negligence, Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Acting Boston Mayor Kim Janey, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT V – NEGLIGENCE V. DEFENDANT
OFFICER JOHN DOE #1

52. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 51 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
53. The Defendant Officer John Doe #1 negligently and erroneously placed the name of the Plaintiff Alfred E. Patterson on the Incident Report resulting in a criminal complaint being filed against him.
54. As a result of the Defendant, Officer John Doe #1's negligence, Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Office John Doe #1, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT VI – NEGLIGENCE V. DEFENDANT
OFFICER JOHN DOE #2

55. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 54 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
56. The Defendant Officer John Doe #2 negligently and erroneously placed the name of the Plaintiff Alfred E. Patterson on the Incident Report resulting in a criminal complaint being filed against him.
57. As a result of the Defendant, Officer John Doe #2's negligence, Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Office John Doe #2, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT VII – DEFAMATION V. DEFENDANT
BOSTON POLICE DEPARTMENT

58. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 57 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
59. The Defendant Boston Police Department was made aware of the wrongful and erroneous criminal complaint against the Plaintiff Alfred E. Patterson.

60. Despite the knowledge of their mistake, the Defendant Boston Police Department did nothing to clear the name of the Plaintiff Alfred E. Patterson nor to dismiss the charges against him.
61. As a result of the actions and/or inactions of the Defendant Boston Police Department, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Boston Police Department, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT VIII – DEFAMATION V. DEFENDANT
BOSTON POLICE COMMISSIONER GREGORY LONG

62. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 61 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
63. As the head of the Boston Police Department the Defendant Boston Police Commissioner Gregory Long was responsible for clearing the name of the Plaintiff Alfred E. Patterson and dropping the charges against him.
64. As a result of the actions and/or inactions of the Defendant Boston Police Commissioner Gregory Long, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Boston Police Commissioner Gregory Long, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT IX – DEFAMATION V. DEFENDANT
CITY OF BOSTON

65. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 64 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
66. As the employer of the Boston Police Department, the Defendant City of Boston was responsible for clearing the name of the Plaintiff Alfred E. Patterson and dropping the charges against him.

67. As a result of the actions and/or inactions of the Defendant City of Boston, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, City of Boston, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT X – DEFAMATION V. DEFENDANT
ACTING BOSTON MAYOR KIM JANEY

68. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 67 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
69. As the head of the City of Boston, the Defendant Acting Boston Mayor Kim Janey is responsible for the actions and/or inactions of its employees and/or agents.
70. As a result of the actions and/or inactions of the Defendant Acting Boston Mayor Kim Janey, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Acting Boston Mayor Kim Janey, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XI – DEFAMATION V. DEFENDANT
OFFICER JOHN DOE #1

71. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 70 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
72. The Defendant Officer John Doe #1 did nothing to clear the name of the Plaintiff Alfred E. Patterson or drop the charges against him.
73. As a result of the actions and/or inactions of the Defendant Officer John Doe #1, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Officer John Doe #1, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XII – DEFAMATION V. DEFENDANT
OFFICER JOHN DOE #2

74. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 73 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
75. The Defendant Officer John Doe #2 did nothing to clear the name of the Plaintiff Alfred E. Patterson or drop the charges against him.
76. As a result of the actions and/or inactions of the Defendant Officer John Doe #2, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Officer John Doe #2, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XIII – LIBEL V. DEFENDANT
BOSTON POLICE DEPARTMENT

77. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 76 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
78. The Defendant Boston Police Department's employees and/or agents did publish a false and defamatory statement when they erroneously filed an incident report accusing Plaintiff Alfred E. Patterson of crimes against a minor child and in fact filed false charges against him.
79. Defendant Boston Police Department allowed the damages to the Plaintiff Alfred E. Patterson's reputation to continue and worsen by not clearing his name or dropping the charges despite their knowledge of the real suspect's name and identity.
80. As a result of the actions and/or inactions of the Defendant Boston Police Department, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Boston Police Department, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XIV – LIBEL V. DEFENDANT
BOSTON POLICE COMMISSIONER GREGORY LONG

81. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 80 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
82. As the head of the Boston Police Department, the Defendant Boston Police Commissioner Gregory Long was responsible for his employees' wrongful publishing of a false and defamatory statement when they erroneously filed an incident report accusing Plaintiff Alfred E. Patterson of crimes against a minor child and in fact filed false charges against him.
83. Defendant Boston Police Commissioner Gregory Long allowed the damages to the Plaintiff Alfred E. Patterson's reputation to continue and worsen by not clearing his name or dropping the charges despite their knowledge of the real suspect's name and identity.
84. As a result of the actions and/or inactions of the Defendant Boston Police Commissioner Gregory Long, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Boston Police Commissioner Gregory Long, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XV – LIBEL V. DEFENDANT
CITY OF BOSTON

85. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 84 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
86. As the employer of the Boston Police Department, the Defendant City of Boston was responsible for the Boston Police Department publishing of a false and defamatory statements about the Plaintiff Alfred E. Patterson accusing him of crimes against a minor child and in fact filing charges against him.
87. As a result of the actions and/or inactions of the Defendant City of Boston, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income,

emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, City of Boston, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XVI – LIBEL V. DEFENDANT
ACTING BOSTON MAYOR KIM JANEY

88. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 87 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
89. As the head of the City of Boston, the Defendant Acting Boston Mayor Kim Janey is responsible for the actions and/or inactions of its employees and/or agents.
90. As a result of the actions and/or inactions of the Defendant Acting Boston Mayor Kim Janey, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Acting Boston Mayor Kim Janey, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XVII – LIBEL V. DEFENDANT
OFFICER JOHN DOE #1

91. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 90 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
92. The Defendant Officer John Doe #1 did publish a false and defamatory statement when he erroneously filed a false incident report accusing the Plaintiff Alfred E. Patterson of crimes against a minor child and in fact filed false charges against him.
93. The Defendant Officer John Doe #1 allowed the damages to the Plaintiff Alfred E. Patterson's reputation to continue and worsen by not clearing his name or dropping the charges despite their knowledge of the real suspect's name and identity.
94. As a result of the actions and/or inactions of the Defendant Officer John Doe #1, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Officer John Doe #1, in an amount which this court deems just and proper plus interest and costs of this action.

**COUNT XVIII – LIBEL V. DEFENDANT
OFFICER JOHN DOE #2**

95. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 94 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
96. The Defendant Officer John Doe #2 did publish a false and defamatory statement when he erroneously filed a false incident report accusing the Plaintiff Alfred E. Patterson of crimes against a minor child and in fact filed false charges against him.
97. The Defendant Officer John Doe #2 allowed the damages to the Plaintiff Alfred E. Patterson's reputation to continue and worsen by not clearing his name or dropping the charges despite their knowledge of the real suspect's name and identity.
98. As a result of the actions and/or inactions of the Defendant Officer John Doe #2, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Officer John Doe #2, in an amount which this court deems just and proper plus interest and costs of this action.

**COUNT XIX – WRONGFUL ARREST and FALSE IMPRISONMENT V.
DEFENDANT BOSTON POLICE DEPARTMENT**

99. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 98 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
100. The Defendant Boston Police Department caused the wrongful arrest of Plaintiff Alfred E. Patterson by their filing of false criminal charges against him.
101. The failure of the Defendant Boston Police Department to clear the Plaintiff's name and drop charges against him caused the Plaintiff to be wrongfully held by other police departments and the FBI including causing the Plaintiff to be placed in jail for approximately six to eight hours in Revere.
102. As a result of the actions and/or inactions of the Defendant Boston Police Department, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business

income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Boston Police Department, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XX – WRONGFUL ARREST and FALSE IMPRISONMENT V.
DEFENDANT BOSTON POLICE COMMISSIONER GREGORY LONG

103. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 102 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
104. As the head of the Boston Police Department the Defendant Boston Police Commissioner Gregory Long is responsible for the actions and/or inactions of his employees and/or agents that caused Plaintiff to be wrongfully arrested and imprisoned.
105. As a result of the actions and/or inactions of the Defendant Boston Police Commissioner Gregory Long, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Boston Police Commissioner Gregory Long, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XXI – WRONGFUL ARREST and FALSE IMPRISONMENT V.
DEFENDANT CITY OF BOSTON

106. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 105 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
107. As the employer of the Boston Police Department the Defendant City of Boston is responsible for the actions and/or inactions of the Boston Police Department that caused the Plaintiff to be wrongfully arrested and imprisoned.
108. As a result of the actions and/or inactions of the Defendant City of Boston, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, City of Boston, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XXII – WRONGFUL ARREST and FALSE IMPRISONMENT V.
DEFENDANT ACTING BOSTON MAYOR KIM JANEY

109. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 108 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
110. As the head of the City of Boston the Defendant Acting Boston Mayor Kim Janey is responsible for the actions and/or inactions of her employees and/or agents that caused the Plaintiff to be wrongfully arrested and imprisoned.
111. As a result of the actions and/or inactions of the Defendant Acting Boston Mayor Kim Janey, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Acting Boston Mayor Kim Janey, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XXIII – WRONGFUL ARREST and FALSE IMPRISONMENT V.
DEFENDANT OFFICER JOHN DOE #1

112. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 111 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
113. The Defendant Officer John Doe #1 actions and/or inactions caused the Plaintiff to be wrongfully arrested and imprisoned.
114. As a result of the actions and/or inactions of the Defendant Officer John Doe #1, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Officer John Doe #1, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XXIV – WRONGFUL ARREST and FALSE IMPRISONMENT V.
DEFENDANT OFFICER JOHN DOE #2

115. The Plaintiff repeats and reavers each and every allegation presented in paragraphs 1 thru 114 of this Complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.
116. The Defendant Officer John Doe #2 actions and/or inactions caused the Plaintiff to be wrongfully arrested and imprisoned.
117. As a result of the actions and/or inactions of the Defendant Officer John Doe #2, the Plaintiff Alfred E. Patterson was caused to sustain loss of reputations, loss of business income, emotional distress, embarrassment, humiliation, out of pocket expenditures, legal fees and wrongful imprisonment thereby restricting his freedom and liberty.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendant, Officer John Doe #2, in an amount which this court deems just and proper plus interest and costs of this action.

COUNT XXV – JOINT AND SEVERAL

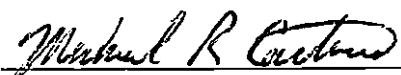
118. The Plaintiff repeats and reavers each and every allegation presented in paragraph 1 through 117 of this complaint and hereby incorporates the same by reference with the same force and effect as if fully set forth herein.

WHEREFORE, the Plaintiff, Alfred E. Patterson, demands judgment against the Defendants, Boston Police Department, Boston Police Commissioner Gregory Long, City of Boston, Acting Boston Mayor Kim Janey Officer John Doe #1 and Officer John Doe #2 jointly and/or severally, in amount which this court deems just and proper plus interest and costs of this action

The Plaintiff, Alfred E. Patterson demands a trial by jury on each and every count presented in this Complaint.

Respectfully Submitted,
By Plaintiff's Attorney,

9/7/21
DATE


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