

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JERRY SIMS, JR.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:26-cv-1004
)	
CITY OF EAST CLEVELAND,)	
KENNETH LUNDY, JOSEPH MARCHE,)	JURY TRIAL DEMANDED
KEVIN HARVEY, SCOTT GARDNER,)	
REGINALD HOLCOMB, and JEFFREY)	
WILLIAMS,)	
)	
Defendants.)	

COMPLAINT

Now comes Plaintiff, JERRY SIMS, JR., by his attorneys, Loevy & Loevy, and complain of Defendants CITY OF EAST CLEVELAND, former East Cleveland Police Detective and Chief of Police KENNETH LUNDY, East Cleveland Police Detective JOSEPH MARCHE, former East Cleveland Police Detective KEVIN HARVEY, former East Cleveland Police Detective Commander SCOTT GARDNER, East Cleveland Police Sergeant REGINALD HOLCOMB, and East Cleveland Police Sergeant JEFFREY WILLIAMS, as follows:

INTRODUCTION

1. Plaintiff Jerry Sims, Jr., spent almost a decade of his life behind bars because of the outrageous sexual exploitation and manipulation of the prosecution’s star witness, Mr. Sims’s then-girlfriend Erica Campbell.

2. Led by Defendant Detective Kenneth Lundy, the Defendants embarked on a scheme to manipulate and coerce Campbell into testifying that she saw Mr. Sims shoot and kill Jamarr Forkland—even though they knew she saw no such thing.

3. Misconduct was rampant in the so-called “investigation.” Defendants jailed and threatened Campbell with prosecution if she did not tell the story they wanted her to tell. They built a false story that Campbell’s life was at risk from Mr. Sims without their protection. Lundy abused his position of authority to coerce Campbell into a sexual relationship, then variously plied her with gifts and undermined her with fear and abuse so that she would testify exactly how Defendants wanted her to. And when Campbell got pregnant with Lundy’s baby, Lundy forced her to get an abortion to prevent their sexual relationship from becoming known before trial.

4. No sworn officer stepped in or stepped up to stop the abuse, coercion, and fabrication of evidence, and information about the sexual exploitation, gifts, and abuse was never disclosed to Mr. Sims.

5. The scheme worked—for a time. Crediting Campbell’s false and fabricated testimony, a jury convicted Mr. Sims of murder and sentenced him to 40.5 years to life in prison. But eventually, the truth came out. After Campbell bravely recanted her testimony and explained the terrible coercion she suffered, the case against Mr. Sims fell apart. He was exonerated in April 2025 when the trial court vacated his conviction and dismissed the charges against him.

6. Mr. Sims now brings this action pursuant to 42 U.S.C. § 1983 and Ohio law seeking redress and justice for the wrongs done to him.

JURISDICTION AND VENUE

7. This Court has jurisdiction over Plaintiff’s federal claims pursuant to 28 U.S.C. § 1331 and over his state-law claims pursuant to 28 U.S.C. § 1367.

8. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because all of the events giving rise to the claims asserted herein occurred within this District.

PARTIES

9. Plaintiff Jerry Sims, Jr., is a 38-year-old resident of Cleveland, Ohio.

10. Defendant City of East Cleveland (the “City”) is an Ohio municipal corporation that operates the East Cleveland Police Department (the “Department”). The City is liable for all state law torts committed by the Defendant Officers while employed by the City pursuant to the doctrine of *respondeat superior*. The City is additionally responsible for the policies and practices of the City and Department that caused the violation of Mr. Sims’s constitutional rights.

11. Defendant Kenneth Lundy was at all times relevant to this Complaint an East Cleveland Police Detective. He was promoted to become East Cleveland Chief of Police after the events giving rise to this lawsuit.

12. Defendant Joseph Marche was at all times relevant to this Complaint an East Cleveland Police Detective.

13. Defendant Kevin Harvey was an East Cleveland Police Detective until he transferred to the Cuyahoga County Sheriff’s Department sometime around late November, 2017.

14. Defendant Scott Gardner was at all times relevant to this Complaint an East Cleveland Police Detective Commander.

15. Defendant Reginald Holcombe was at all times relevant to this Complaint an East Cleveland Police Sergeant.

16. Defendant Jeffrey Williams was at all times relevant to this Complaint an East Cleveland Police Sergeant.

17. At all times relevant herein, Defendants Gardner, Holcombe, and Williams supervised Defendants Lundy, Marche, and Harvey.

18. Defendants Lundy, Marche, Harvey, Gardner, Holcombe, and Williams are collectively referred to as the “Defendant Officers.” At least one of the Defendant Officers was, at all times relevant, a final policymaker, or had been delegated such authority, for the Defendant City.

19. At all times relevant, Defendants Lundy, Marche, Harvey, Gardner, Holcombe, and Williams acted under color of law and within the scope of their employment for the Defendant City and the East Cleveland Police Department. They are sued in their individual capacities.

FACTS

20. Because of Defendants’ misconduct, Mr. Sims spent more than seven years wrongfully incarcerated for the murder of Jamarr Forkland.

I. The Murder of Jamarr Forkland

21. Early in the morning of October 21, 2017, officers from the East Cleveland Police Department responded to a call of a vehicle on fire on Wadena Street in East Cleveland. The remains of Jamarr Forkland were discovered inside the burned vehicle.

22. An autopsy revealed that Forkland had suffered multiple gunshot wounds and had alcohol, PCP, and marijuana in his system at the time of his death.

23. Mr. Sims had interacted with Forkland on the evening of October 20, 2017, prior to Forkland’s death. The two had gotten into a physical altercation, but others present broke up the fight.

24. After the fight was broken up, Mr. Sims and his girlfriend, Erica Campbell, went about their evening, ultimately spending the night at Mr. Sims's mother's house.

25. Forkland was alive when Mr. Sims last saw him.

26. Mr. Sims did not murder Jamarr Forkland.

27. The murder weapon was never recovered, and no physical evidence whatsoever links Mr. Sims to the murder.

28. Despite his innocence, Mr. Sims was arrested for the murder of Forkland on or about November 2, 2017.

II. The Manipulation and Coercion of Erica Campbell

29. The key evidence used against Mr. Sims was the fabricated and coerced testimony of Campbell.

30. On information and belief, the Defendant Officers wanted Mr. Sims to be guilty of the murder and decided that Campbell was their ticket to an easy resolution of the case.

31. Defendants Gardner, Harvey, and Lundy interviewed Campbell on or about October 31, 2017.

32. Campbell did not implicate Mr. Sims at this interview.

33. Thereafter, Gardner, Harvey, and Lundy decided Campbell was lying, arrested Campbell, and held her in jail.

34. Defendants Marche and Harvey interviewed Campbell a second time on or about November 1, 2017.

35. At this second interview, Marche and Harvey threatened Campbell that she would face criminal charges if she did not implicate Mr. Sims. Marche and Harvey further threatened Campbell that Mr. Sims was probably going to kill her if she left the jail.

36. Defendant Lundy further used his position as a police officer to initiate a manipulative and abusive romantic relationship with Campbell.

37. Lundy exploited the vulnerable position that Campbell was in, engaging in a sexual relationship with her, while at the same time causing her to fear Mr. Sims and promising her protection.

38. Lundy's efforts to cultivate fear in Campbell included making it seem as if Campbell was receiving threatening messages from Mr. Sims, successfully helping to maintain the illusion that Campbell needed Lundy to keep her safe.

39. After their relationship became sexual, Lundy began to pressure Campbell to implicate Mr. Sims in her statement.

40. Under improper pressure from the Defendant Officers from all sides, by her third interview (which was with Lundy and a detective from the Cleveland Police Department), Campbell lied and said that Sims was the shooter.

41. Lundy and the other Defendant Officers knew this statement was false and fabricated.

42. Defendants' manipulations of Campbell did not end there.

43. Lundy's sexual relationship with Campbell continued through Mr. Sims's November 2019 trial.

44. Campbell became pregnant with Lundy's baby prior to the trial. Lundy coerced Campbell to obtain an abortion, admitting to her that if their sexual relationship became known before trial, it would look bad.

45. Also prior to trial, Lundy plied Campbell with numerous extravagant dinners, trips, and gifts.

46. Furthermore, Lundy prepared Campbell for Mr. Sims's trial by having her watch witness interview tapes, including her own final police interview, to make sure she would testify that Sims was the person who shot Jamarr Forkland.

47. Additionally, Defendant Marche also kissed Campbell on at least one occasion prior to trial.

48. Again, under improper pressure from the Defendant Officers from all sides, Campbell falsely testified at trial that she witnessed Mr. Sims shoot Forkland.

49. In actuality, Campbell did not see Mr. Sims shoot anyone. Under coercion and manipulation from Lundy and the other Defendant Officers, she did not feel free to tell the truth. Nevertheless, Campbell's false testimony became the key evidence against Mr. Sims at trial.

50. On information and belief, as supervisors, Defendants Gardner, Holcombe, and Williams were aware of the various coercive, manipulative, and improper relationships between the Defendant Officers and Campbell intended to procure Campbell's false and fabricated testimony.

51. Defendants Gardner, Holcombe, and Williams nevertheless took no action to protect Campbell or safeguard the investigatory process.

52. On information and belief, Defendants Gardner, Holcombe, and Williams either expressly or tacitly approved of the effort to obtain Campbell's false and fabricated testimony.

53. Furthermore, Defendants failed to disclose to Mr. Sims information regarding the coercion, manipulation, gifts, and abuse targeted at Campbell prior to trial, nor did Defendants disclose impeachment evidence from Lundy's personnel file showing a disciplinary record of using his law enforcement position for his own sexual gratification.

54. Because of these omissions, Mr. Sims's ability to mount a defense and impeach the witnesses against him was seriously and fatally curtailed.

55. A jury found Mr. Sims guilty of aggravated murder and other lesser included offenses on November 25, 2019.

56. On December 27, 2019, Mr. Sims was sentenced to serve a term of mandatory imprisonment in the Ohio Department of Corrections of 40.5 years to life.

III. The Exoneration of Mr. Sims

57. After the trial, Lundy became physically and emotionally abusive of Campbell, choking her on more than one occasion and pulling his firearm on her numerous times.

58. The harassment continued even after Campbell and Lundy broke up, and Campbell made multiple reports of Lundy's abusive and harassing behavior to the Mayfield Police Department.

59. Campbell would not come forward with her story—and the truth—for years because she so feared Lundy and his deep influence with law enforcement and prosecutors. Meanwhile, Mr. Sims remained in prison for a murder he did not commit.

60. But the truth eventually did come out. After Campbell retracted her testimony and explained the coercive and manipulative circumstances under which it was given, Mr. Sims filed a petition for post-conviction relief on January 7, 2025.

61. On April 29, 2025, the trial court vacated Mr. Sims's conviction and the charges against him were dismissed.

IV. Mr. Sims's Injuries

62. After being continually detained since his arrest in November 2017—a period of more than seven years, Mr. Sims is once again a free man. After being deprived of a significant portion of his 30s, Mr. Sims must now attempt to rebuild his life.

63. Additionally, the emotional pain and suffering caused by losing so many years in the prime of life has been enormous. During their wrongful incarceration, Mr. Sims was stripped of the various pleasures of basic human experience, from the simplest to the most important, which all free people enjoy as a matter of right. He missed out on the ability to share holidays, births, funerals, and other life events with loved ones, the opportunity to fall in love and marry and to pursue a career, and the fundamental freedom to live one's life as an autonomous human being.

64. As a result of the foregoing, Mr. Sims has suffered tremendous damage, including physical sickness and injury and emotional and economic damages, all proximately caused by Defendants' misconduct.

CLAIMS FOR RELIEF

COUNT I: 42 U.S.C. § 1983 – Fourteenth Amendment Due Process

65. Plaintiff Sims reasserts, realleges, and incorporates by reference all of the paragraphs of this Complaint.

66. In the manner described more fully above, the Defendants, while acting individually, jointly, and in conspiracy with each other, deprived Plaintiff of his constitutional right to due process.

67. In the manner described more fully above, the Defendant Officers deliberately failed to disclose and withheld and/or suppressed exculpatory evidence from Plaintiff, his

counsel, and prosecutors, among others, thereby misleading and misdirecting the criminal prosecution of Plaintiff.

68. In the manner described more fully above, the Defendant Officers knowingly fabricated false evidence, including but not limited to the statements and testimony of Erica Campbell and police reports, thereby misleading and misdirecting the criminal prosecution of Plaintiff.

69. The Defendant Officers' misconduct directly resulted in the unjust criminal convictions of Plaintiff, thereby denying him his constitutional rights to due process and a fair trial guaranteed by the U.S. Constitution. By their actions, the Defendant Officers thereby misled and misdirected the criminal prosecution of Plaintiff. Absent this misconduct, the prosecution of Plaintiff could not and would not have been pursued, and there is a reasonable probability that he would not have been convicted.

70. The constitutional injuries complained-of herein were also proximately caused by the intentional misconduct of the supervisory defendants, including Defendants Gardner, Holcomb, and Williams, or when they were deliberately, recklessly indifferent to their subordinates' misconduct, knowing that turning a blind eye to that misconduct would necessarily violate Plaintiff's constitutional rights.

71. Specifically, these supervisory defendants, including Defendants Gardner, Holcomb, and Williams, were aware of and facilitated, condoned, and oversaw the unconstitutional measures used by other Defendants to obtain Campbell's false testimony, or were deliberately, willfully, or recklessly indifferent to their subordinates' unconstitutional tactics.

72. Moreover, these supervisory defendants, including Defendants Gardner, Holcomb, and Williams, were aware of and facilitated, conducted, and oversaw the withholding of exculpatory evidence, but failed to disclose that information, or were deliberately, willfully or recklessly indifferent to their subordinates' unconstitutional actions in withholding exculpatory evidence.

73. The Defendants were acting under color of law and within the scope of their employment when they took these actions.

74. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, with reckless and deliberate indifference to the rights of others.

75. The misconduct described in this Count was undertaken pursuant to the policy and practice of the Defendant City and the Department in that East Cleveland police officers regularly used unconstitutional measures to falsely implicate criminal suspects, including by withholding and/or suppressing exculpatory evidence and fabricating evidence.

76. This widespread practice was so well-settled as to constitute de facto policy in the East Cleveland Police Department, and it was allowed to exist because municipal policymakers with authority over the same exhibited deliberate indifference to the problem, thereby effectively ratifying it.

77. Furthermore, the widespread practices described in the preceding paragraphs were allowed to flourish because the Defendant City and the Department declined to implement sufficient policies or training on officers' obligation to disclose exculpatory and impeachment evidence, the fabrication of evidence or police reports, or the obligation not to provide details about crimes to witnesses, even though the need for policies and training on such topics was obvious. The Defendant City and the Department also declined to implement any legitimate

mechanism for oversight or punishment of officers who violated their obligations, thereby leading officers to believe that they could violate citizens' constitutional rights with impunity.

78. Defendant City is liable because the violation of Plaintiff's rights as described in this Count was caused by the policies, practices, customs, and/or actions of final policymakers for these Defendants.

79. As a direct and proximate result of the Defendants' actions, Plaintiff's constitutional rights were violated and he suffered injuries, including but not limited to loss of liberty, physical sickness and injury, emotional pain and suffering, economic damages, and other grievous and continuing injuries and damages as set forth above.

COUNT II: 42 U.S.C. § 1983 – Fourth and Fourteenth Amendments

80. Plaintiff Sims reasserts, realleges, and incorporates by reference all of the paragraphs of this Complaint.

81. In the manner described more fully above, the Defendant Officers, acting individually, jointly, and in conspiracy with each other, accused Plaintiff of criminal activity knowing those accusations to be without genuine probable cause, and they made statements to prosecutors with the intent of exerting influence to institute and continue the judicial proceedings. The Defendant Officers made, instigated, influenced, or participated in the decision to prosecute Plaintiff, and criminal proceedings were commenced against Plaintiff.

82. There was no probable cause for the criminal prosecutions of Plaintiff.

83. In doing so, the Defendant Officers caused Plaintiff to be unreasonably seized without probable cause and deprived of his liberty, in violation of his rights secured by the Fourth and Fourteenth Amendments. Plaintiff suffered a continued deprivation of liberty apart from his initial seizures.

84. Plaintiff's criminal prosecution was terminated in his favor, in a manner indicative of innocence.

85. Absent Defendant Officers' misconduct, there would have been no probable cause for Plaintiff's continued detention, and the prosecution of Plaintiff could not and would not have been pursued. This misconduct caused Plaintiff to be wrongfully convicted of crimes of which he is innocent.

86. Additionally, the constitutional injuries complained-of herein were proximately caused by the intentional misconduct of the supervisory defendants, including Defendants Gardner, Holcomb, and Williams, or when they were deliberately, recklessly indifferent to their subordinates' misconduct, knowing that turning a blind eye to that misconduct would necessarily violate Plaintiff's constitutional rights.

87. Specifically, these supervisory defendants, including Defendants Gardner, Holcomb, and Williams, were aware of and facilitated, condoned, and oversaw the unconstitutional measures used by other Defendants or were deliberately, willfully, or recklessly indifferent to their subordinates' unconstitutional tactics.

88. Furthermore, in the manner described more fully above, the Defendant Officers deliberately engaged in arbitrary and conscience-shocking conduct that contravened fundamental canons of decency and fairness and violated Plaintiff's substantive due process rights under the Fourteenth Amendment.

89. The Defendants were acting under color of law and within the scope of their employment when they took these actions.

90. Defendants' misconduct described in this Count was undertaken pursuant to the policies, practices, and customs of Defendant City, in the manner described more fully above.

91. As a direct and proximate result of the Defendants' actions, Plaintiff's constitutional rights were violated and he suffered injuries, including but not limited to loss of liberty, physical sickness and injury, emotional pain and suffering, economic damages, and other grievous and continuing injuries and damages as set forth above.

COUNT III: 42 U.S.C. § 1983 – Failure to Intervene

92. Plaintiff Sims reasserts, realleges, and incorporates by reference all of the paragraphs of this Complaint.

93. In the manner described more fully above, during the constitutional violations described herein, one or more of the Defendants stood by without intervening to prevent the violation of Plaintiff's constitutional rights, even though they had the opportunity to do so. That is, the Defendants observed or had reason to know that Plaintiff's constitutional rights were being or would be violated, and they had both the opportunity and the means to prevent harm from occurring.

94. The Defendants were acting under color of law and within the scope of their employment when they took these actions.

95. Defendants' misconduct described in this Count was undertaken pursuant to the policies, practices, and customs of Defendant City, in the manner described more fully above.

96. As a direct and proximate result of the Defendants' actions, Plaintiff's constitutional rights were violated and they suffered injuries, including but not limited to loss of liberty, physical sickness and injury, emotional pain and suffering, economic damages, and other grievous and continuing injuries and damages as set forth above.

COUNT IV: 42 U.S.C. § 1983 – Conspiracy to Deprive Constitutional Rights

97. Plaintiff Sims reasserts, realleges, and incorporates by reference all of the paragraphs of this Complaint.

98. Prior to Plaintiff's conviction, all of the Defendant Officers, acting in concert with other co-conspirators, known and unknown, reached an agreement among themselves to frame Plaintiff for a crime he did not commit and thereby to deprive him of his constitutional rights, in the manner described more fully above. Together, through numerous conversations, the Defendant Officers fabricated evidence, withheld and destroyed evidence, manipulated witnesses' statements and testimony, and unlawfully undermined Plaintiff's defenses.

99. In so doing, these co-conspirators conspired to accomplish an unlawful purpose by an unlawful means. In addition, these co-conspirators agreed among themselves to protect one another from liability by depriving Plaintiff of these rights.

100. In furtherance of their conspiracy, each of these co-conspirators committed overt acts and were otherwise willful participants in joint activity, in the manner described more fully above.

101. The Defendants were acting under color of law and within the scope of their employment when they took these actions.

102. As a direct and proximate result of the Defendants' actions, Plaintiff's constitutional rights were violated and he suffered injuries, including but not limited to loss of liberty, physical sickness and injury, emotional pain and suffering, economic damages, and other grievous and continuing injuries and damages as set forth above.

COUNT V: Ohio State Law – Malicious Prosecution

103. Plaintiff Sims reasserts, realleges, and incorporates by reference all of the paragraphs of this Complaint.

104. In the manner described more fully above, the Defendant Officers, acting maliciously, individually, jointly, and in conspiracy with each other, instituted or continued the prosecution of Plaintiff without probable cause. As a consequence of the criminal prosecution, Plaintiff was unlawfully seized, deprived of liberty, and wrongfully convicted of a crime of which he is innocent. Plaintiff's criminal prosecution was terminated in his favor in a manner indicative of innocence.

105. The Defendant Officers accused Plaintiff of criminal activity knowing those accusations to be without genuine probable cause, and they made statements to prosecutors with the intent of exerting influence to institute and continue the judicial proceedings.

106. The Defendant Officers were acting under color of law and within the scope of their employment when they took these actions.

107. Through the doctrine of *respondeat superior*, Defendant City is liable as principal for all state law torts committed by its employees or agents, including the misconduct by Defendant Officers described in this Count.

108. As a direct and proximate result of the Defendants' actions, Plaintiff's constitutional rights were violated and he suffered injuries, including but not limited to loss of liberty, physical sickness and injury, emotional pain and suffering, economic damages, and other grievous and continuing injuries and damages as set forth above.

COUNT VI: Ohio State Law – Intentional Infliction of Emotional Distress

109. Plaintiff Sims reasserts, realleges, and incorporates by reference all of the paragraphs of this Complaint.

110. In the manner described more fully above, Defendants, acting individually, jointly, and in conspiracy with each other, intentionally or recklessly engaged in extreme and outrageous conduct that caused Plaintiff serious, severe emotional distress as well as bodily harm. The Defendants' misconduct was the actual and proximate cause of Plaintiff's emotional distress and bodily harm.

111. The Defendants were acting under color of law and within the scope of their employment when they took these actions.

112. Through the doctrine of *respondeat superior*, Defendant City is liable as principal for all state law torts committed by their employees or agents, including the misconduct by Defendants described in this Count.

113. As a direct and proximate result of the Defendants' actions, Plaintiff's constitutional rights were violated and he suffered injuries, including but not limited to loss of liberty, physical sickness and injury, emotional pain and suffering, economic damages, and other grievous and continuing injuries and damages as set forth above.

COUNT VII: Ohio State Law – Civil Conspiracy

114. Plaintiff Sims reasserts, realleges, and incorporates by reference all of the paragraphs of this Complaint.

115. In the manner described more fully above, the Defendants, acting in concert with other known and unknown co-conspirators in a malicious combination, conspired by concerted action to accomplish an unlawful purpose by unlawful means.

116. In the manner described more fully above, in furtherance of the conspiracy, the Defendants committed overt acts and were otherwise willful participants in joint activity including but not limited to the malicious prosecution of Plaintiff, the intentional infliction of emotional distress upon him, and the deprivation of his due process rights.

117. The Defendants were acting under color of law and within the scope of their employment when they took these actions.

118. Through the doctrine of *respondeat superior*, Defendant City is liable as principal for all state law torts committed by their employees or agents, including the misconduct by Defendants described in this Count.

119. As a direct and proximate result of the Defendants' actions, Plaintiff's constitutional rights were violated and he suffered injuries, including but not limited to loss of liberty, physical sickness and injury, emotional pain and suffering, economic damages, and other grievous and continuing injuries and damages as set forth above.

COUNT VIII: Ohio State Law – *Respondeat Superior*

120. Plaintiff Sims reasserts, realleges, and incorporates by reference all of the paragraphs of this Complaint.

121. While committing the acts alleged in the preceding paragraphs, the Defendant Officers were employees and agents of the Defendant City, acting at all relevant times within the scope of their employment.

122. Defendant City is liable as principal for all state law torts committed by their agents.

COUNT IX: Ohio State Law -- Indemnification

123. Plaintiff Sims reasserts, realleges, and incorporates by reference all of the paragraphs of this Complaint.

124. Ohio law provides that the Defendant City is directed to pay any tort judgment for compensatory damages for which its employees are liable within the scope of their employment activities.

125. The Defendant Officers were employees of the Defendant City, as described above, and acted within the scope of their employment at all times relevant in committing the actions and omissions described herein.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, JERRY SIMS, JR., respectfully request that this Court enter a judgment in his favor and against Defendants CITY OF EAST CLEVELAND, former East Cleveland Police Detective and Chief of Police KENNETH LUNDY, East Cleveland Police Detective JOSEPH MARCHE, former East Cleveland Police Detective KEVIN HARVEY, former East Cleveland Police Detective Commander SCOTT GARDNER, East Cleveland Police Sergeant REGINALD HOLCOMB, and East Cleveland Police Sergeant JEFFREY WILLIAMS, awarding compensatory damages, costs, and attorneys' fees against each Defendant, along with punitive damages against each of the individual Defendants, as well as any other relief this Court deems appropriate.

JURY DEMAND

Plaintiff JERRY SIMS, JR. hereby demands a trial by jury pursuant to Federal Rule of Civil Procedure 38(b) on all issues so triable.

Respectfully submitted,
JERRY SIMS, JR.

By: /s/ Rachel Troutman
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