

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MICHAEL OLIVER,

Plaintiff,

Case No.

v.

Hon.

JACKSON COUNTY COMMUNITY  
COLLEGE; JACKSON COUNTY SHERIFF'S  
DEPARTMENT;

ETHAN SMITH, individually and in  
his capacity as a Sheriff's Deputy with the  
Jackson County Sheriff's Department;

DETECTIVE MEYERS, individually and in his  
capacity as a Sheriff's Deputy with the  
Jackson County Sheriff's Department;

REBEKAH WOODS, in her individual  
capacity; MICHAEL COY, in his  
individual capacity; LEIGH ANN SWIHART,

in her individual capacity; and CHARLES ADAMS,  
in his individual capacity,

Defendants.

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**JENNIFER B. SALVATORE (P66640)**

**EDWARD A. MACEY (P72939)**

**NACHT, ROUMEL, SALVATORE**

**BLANCHARD & WALKER, P.C.**

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**COMPLAINT AND JURY DEMAND**

NOW COMES Plaintiff, MICHAEL OLIVER, by and through his attorney, NACHT, ROUMEL, SALVATORE, BLANCHARD & WALKER, P.C., and hereby complains of Defendants JACKSON COMMUNITY COLLEGE, JACKSON COUNTY SHERIFF'S DEPARTMENT, ETHAN SMITH, DETECTIVE MEYERS, REBEKAH WOODS, MICHAEL COY, LEIGH ANN SWIHART, and CHARLES ADAMS, as follows:

**NATURE OF THE CASE**

1. At Jackson Community College, the 2011 Martin Luther King holiday lesson this year was that when a black man complains about a noose on his desk and racial harassment by a professor, he ends up in handcuffs in the back of a police car; the subject of a campus-wide lockdown. Indeed, on the Friday before Martin Luther King Jr. day, JCC student Michael Oliver was a target of racial stereotypes, leading to an unconstitutional seizure by police. His alleged crime? Being an angry black man.

2. In 2010, Plaintiff Michael Oliver returned to school at Jackson Community College (JCC) in an effort to further himself and provide an example to his four children. To his dismay, in his first semester, Mr. Oliver was subjected to repeated racial harassment by a professor and students in one of his classes. His Professor made several racially inappropriate remarks. And, during a lesson on knot tying, a noose was tied and placed on Mr. Oliver's desk. Mr. Oliver was the only African-American student in the class.

3. When Mr. Oliver complained about these incidents, Jackson Community College failed to adequately respond. Then, in January 2011, on the Friday before the Martin Luther King Jr. holiday – JCC officials called the police on Mr. Oliver when he insisted that the professor involved be held accountable. JCC officials called the police despite acknowledging

that Mr. Oliver never threatened anyone. Indeed, JCC apparently called the authorities because Mr. Oliver, in expressing his frustration about the racial harassment and JCC's handling of it, got upset on the phone, which made the white female JCC employee he was talking to feel "uneasy." Unlike the noose incident (which JCC failed to adequately respond to), Mr. Oliver's frustrated tone during a phone call about racial harassment triggered an immediate and over-the-top response by JCC.

4. When the police were called, rather than exercising any independent judgment or appropriate analysis, they instead seized, handcuffed, and forced Mr. Oliver to a hospital for a mental health evaluation. The police seized Mr. Oliver even though he displayed no signs of mental health problems in his interactions with police, had no prior mental health history, and even though he explained that he was the victim of harassment.

5. Jackson Community College then immediately banned Mr. Oliver from campus and sent a series of emails to staff describing him as a threat and telling staff to call 9-1-1 immediately if Mr. Oliver was seen on campus.

6. Mr. Oliver was evaluated by medical professionals who found no mental health concerns. Nonetheless, Mr. Oliver remained banned from campus. Initially, he was only allowed to return if he, the victim of racial harassment, complied with various requirements – including weekly meetings with a social worker. In addition, the press was alerted to the incidents and a number of stories ran in the local paper and on television regarding an alleged "threat" made by a JCC student. Those stories led to Mr. Oliver being identified as the alleged source of the threat and the cause of the campus lock-down. This caused great distress to Mr. Oliver and his family.

7. Mr. Oliver's eventual attempts to return to campus proved unsuccessful because faculty and students now view him suspiciously, and he no longer feels safe at a school that was both slow to respond to racial harassment and that moved so quickly to have him arrested and banned from campus when he complained about it.

**PARTIES AND JURISDICTION**

8. Plaintiff Michael Oliver is an individual who resides in Jackson, Michigan in the County of Jackson.

9. Defendant Jackson County Community College is a public educational institution in Jackson County, Michigan

10. Defendant Jackson County Sheriff's Department is a municipal government agency that employs individuals to work in Jackson County, Michigan. At all times relevant to this lawsuit, Defendant Jackson County Sheriff's Department was a governmental entity set up under the color and pretense of statutory ordinances and laws of the State of Michigan.

11. Defendants Smith and Meyers are individuals who worked as Sheriff's Deputies for the Jackson County Sheriff's Department, and who, upon information and belief, live in Jackson County.

12. Defendants Woods, Swihart, and Coy are individuals who work for Jackson Community College, and who, upon information and belief, live in Jackson County.

13. Defendant Adams is employed by both Jackson Community College and as a Sergeant in the Jackson County Sheriff's Department. Mr. Adams was on a temporary part-time assignment to train JCC security in the use of firearms, and upon information and belief, was working on JCC's behalf during the incidents in question.

14. The Defendants are not entitled to qualified or governmental immunity.

15. This court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 and pursuant to 42 U.S.C. § 1983. This action arose under the United States Constitution, particularly under the provisions of the First, Fourth, and Fourteenth Amendments of the Constitution.

16. Venue in this Court is proper under 28 U.S.C. § 1391(b) because all of the events giving rise to this claim took place in this district and the Defendants are governmental entities within the district or individuals who reside in this district.

**GENERAL ALLEGATIONS**

**A. Mr. Oliver Was Subjected to Racist Treatment in a Class at Jackson Community College.**

17. Mr. Oliver is a 46 year old dark-skinned African American male with no history of mental illness. Mr. Oliver is a life-long resident of Jackson, where he has been working on starting a non-profit for disadvantaged children in the community. Mr. Oliver has four children of his own.

18. In the fall semester of 2010, Mr. Oliver was taking a theater sound and lighting class at Jackson Community College.

19. The instructor in the class was Defendant Michael Coy, a white male.

20. On or about October 22, 2010, a white female student commented to Defendant Coy in class that her car had broken down on Francis Street in Jackson.

21. Defendant Coy stated that if he had known, he would have come to “save her,” and protect her from the “bad, bad people on Francis Street who would do something to you.”

22. Mr. Oliver, who grew up near Francis Street, objected to the statement, and stated that Francis Street had a number of good people living on it.

23. Defendant Coy then immediately reiterated – in front of the entire class – that “bad, bad people” live on Francis Street.

24. Francis Street is largely populated by African-American families and individuals.

25. A week later – on or about October 29, 2010 – Professor Coy’s class engaged in a rope tying exercise. One rope was used by the students, who took turns tying the knot.

26. Defendant Coy has subsequently acknowledged that every time he does this exercise, students in the class attempt to tie the rope into a noose. Nonetheless, Defendant Coy made no effort to discuss how noose-tying was inappropriate or take any steps to prevent a noose from being tied.

27. Mr. Oliver, who was the only African American student in the class, performed the task last, and then went to the bathroom.

28. When Mr. Oliver returned, the rope had been tied into a noose, his desk was pushed together with another, and the noose was laid across his desk, hanging towards the floor.

29. Mr. Oliver, seeing the noose, made eye contact with Professor Coy. Defendant Coy saw the noose, didn't say anything, and merely dismissed the class for the rest of the day.

30. Mr. Oliver attempted to contact a number of administrators the next Monday and Tuesday, November 1<sup>st</sup> and 2<sup>nd</sup>, to complain about the incident.

31. Mr. Oliver was unable to speak substantively about the incident with anyone in the JCC administration in the next two weeks.

32. On or about November 19, 2010, Mr. Oliver experienced another racial incident in the same class. Mr. Oliver and other students were unloading video equipment. Mr. Oliver asked Jesse Tanner, a teaching aid, where he could buy a chroma wall for video.

33. Mr. Tanner said he could get it for Mr. Oliver, and that there are different kinds of chroma walls – generally blue and green.

34. Mr. Tanner then referenced black chroma walls and advised against Mr. Oliver buying one since, against his face, “it will only show your teeth and eyes.”

**B. Mr. Oliver Complained to JCC Officials and Sought Resolution.**

35. After this third racial incident in less than a month, Mr. Oliver was upset, and he contacted Defendant Rebekah Woods, the Dean of Arts and Sciences at JCC.

36. After the Thanksgiving holiday, but before the next class, Mr. Oliver spoke with Defendant Woods. Mr. Oliver stated that he wanted to address the issue of Professor Coy's conduct, and Dean Woods indicated that she would go to the next class with Mr. Oliver to discuss it.

37. On December 3, 2010, the date of his next class, Mr. Oliver reported to Ms. Woods' office so that they could go to Professor Coy's class together. He was told by Ms. Woods' assistant, however, that he needed to make an appointment to see her.

38. Mr. Oliver thus went to the class himself. Upon arriving, he told Defendant Coy that he was offended and violated by what had happened to him in the class.

39. Mr. Oliver did not make any threats or any statements that could reasonably be construed as a threat.

40. Defendant Coy stated that he was sorry, and followed Mr. Oliver out of the room. Mr. Oliver said it was too late for an apology, and that Defendant Coy was a big part of the problem.

41. After leaving class, Mr. Oliver was eventually approached by Defendant Leigh Ann Swihart, JCC's Student Ombudsman.

42. Defendant Swihart informed Mr. Oliver that he should not go back to Defendant Coy's class. She also informed him that he would not be penalized for failing to complete Defendant Coy's class.

43. Mr. Oliver also followed up with Defendant Woods about the impact of his absences from Defendant Coy's class on his grade for that class. Defendant Woods emphasized that Mr. Oliver would not be penalized.

44. On December 22, 2010, Mr. Oliver filed a formal race discrimination complaint against Defendant Coy, based on the events in his class.

45. In response, Dean Woods met with Professor Coy. Defendant Coy acknowledged making the statement about Francis Street and acknowledged that he saw a noose in class, as he has every semester.

46. Defendant Coy also acknowledged that he did nothing to stop the apparently inevitable noose-tying and that he failed to respond when he saw that a noose had been placed on Mr. Oliver's desk.

47. On January 7, 2011, Defendant Woods called Mr. Oliver and suggested a meeting with her and Professor Coy. Mr. Oliver expressed that he did not want to meet with Defendant Coy.

48. Defendant Woods indicated that Defendant Coy had admitted that Mr. Oliver's complaints were true.

49. Meanwhile, Mr. Oliver received a grade of 1.0 in Defendant Coy's class, even though he had been maintaining a GPA of 3.5 at the time he left the class. For obvious reasons, this grade was contrary to the repeated promises that Mr. Oliver would not be punished for failing to complete the semester.

50. When Mr. Oliver complained to Defendant Woods about his grade, she responded that it "takes time" to fix grades.

**C. Mr. Oliver Expressed Concern about the Pace of JCC's Investigation.**

51. On January 14, 2011, Mr. Oliver had still received no formal response to his complaint against Defendant Coy. Furthermore, his grade was still a 1.0. Mr. Oliver called Defendant Swihart to express his concern about these issues.

52. Mr. Oliver asked Defendant Swihart if she had spoken to Dean Woods, who had previously told Mr. Oliver that Defendant Coy had admitted the allegations. Mr. Oliver expressed how much this experience had hurt him.

53. Mr. Oliver restated that he didn't want to meet with Defendant Coy or accept an apology. When asked what he wanted in resolution, Mr. Oliver stated that it was not his job to discipline Defendant Coy, that it was the administration's.

54. Never once did Mr. Oliver say anything threatening to Defendant Swihart or anything that could reasonably be construed as a threat against anyone. He was, admittedly, frustrated with JCC, but he did not say or do anything inappropriate or unusual under the circumstances.

**D. JCC Employees Responded to Mr. Oliver's Complaints by Contacting Police and Banning Mr. Oliver from Campus.**

55. Shortly after the call, Defendant Woods called Mr. Oliver. Mr. Oliver restated how hurtful the entire episode had been to him.

56. During the call, Mr. Oliver's fiancé, who was with him, received a call from friends, who had just heard on a police scanner that Defendant JCC had called the police on Mr. Oliver. The friends relayed that JCC was apparently accusing Mr. Oliver of making threats, and that the police were at JCC looking for him.

57. Alarmed, Mr. Oliver asked Defendant Woods whether she believed he had made any threats. She stated: “Michael, you haven’t threatened me or anyone.” Defendant Woods confirmed this to Mr. Oliver’s fiancé, who was in the room with Mr. Oliver during the call.

58. Mr. Oliver told Defendant Woods to keep the police at JCC because he wanted to talk to them and file a complaint about false statements being made to the police.

59. Mr. Oliver then proceeded to drive to JCC with his fiancé. He arrived at the Dean’s office and sat peacefully outside.

60. While he waited to talk to the police, Mr. Oliver was unaware of what was transpiring at JCC.

61. The call to the police was apparently triggered following a meeting convened by Defendant Swihart after her initial conversation with Mr. Oliver that morning. Despite no threats of any kind, Defendant Swihart stated that she had an “uneasy feeling” about Mr. Oliver. Based on this “uneasy feeling,” JCC administration officials then decided to immediately convene a meeting of the JCC Critical Incident Team (“CIT”).

62. The CIT convened with eight to ten JCC employees, including Defendant Swihart, Defendant Woods, and – joining after the start of the meeting – Defendant Coy and Defendant Adams.

63. The CIT interviewed Defendant Coy for a report on his interactions with Mr. Oliver.

64. Defendant Coy never alleged any threats against him and only referenced the December 3, 2010 incident, when Mr. Oliver left his class angry.

65. Nonetheless, despite no evidence or even allegations of any threats, the CIT authorized a call to police stating that Mr. Oliver had made threats.

66. In addition, the school decided to ban Mr. Oliver from campus. At 12:55 p.m., an email was sent out to all JCC employees saying that Mr. Oliver was a threat. The email included a picture of Mr. Oliver.

67. The Email, which was sent with high importance, stated:

The Critical Incident Team is providing notification of a potential threat to campus safety. Current student, Michael Oliver, an African-American male of 46 years of age, has made comments that cause concern. A picture is attached. Please call 911 if you see him.

He is unwelcomed on campus. Once the threat warning has been concluded, you will be notified via this communication.

Please close all outside office doors, when possible.

68. The Jackson County Sheriff's Department responded to JCC's call by sending Deputy Smith and Deputy Meyers. The two officers met with Defendant Adams, a Jackson County Sheriff's Department Sergeant who was serving at the time in question as a security officer for JCC.

69. The officers reported that they were told that Mr. Oliver was making threats against Defendant Coy and other administrators.

**D. The Police Conducted a Haphazard Investigation.**

70. Detective Adams did not bring the police officers to Defendant Swihart, who had spoken with Mr. Oliver that day. Instead, he brought them to Professor Coy, a man who had not seen or spoken to Mr. Oliver in over a month, and the man against whom Mr. Oliver filed a report of racial harassment.

71. Defendant Coy told the officers about the December 3, 2010 class, but made no allegation of any threat against him or anyone else.

72. Before Officers Smith and Meyers could interview Defendant Swihart, they learned that Mr. Oliver had arrived on campus. With only Defendant Coy's retelling of a six-week old story that involved no threats, they proceeded to interview Mr. Oliver.

73. Defendant Adams – again, apparently based simply on Defendant Swihart's "uneasy feeling" during a phone conversation with Mr. Oliver – then requested that the police officers take Mr. Oliver to Allegiance Health for a mental health examination.

**E. The Police Seized Mr. Oliver Without Probable Cause.**

74. Jackson County Sheriff's Officers Smith and Adams approached Mr. Oliver, who was waiting peacefully outside the dean's office, where he had requested that a security guard call police.

75. Defendant Smith separated Mr. Oliver from his fiancé and took him downstairs into a hallway.

76. Defendant Smith was joined downstairs by Defendant Meyers.

77. Mr. Oliver attempted to explain the situation, and affirmatively stated that he made no threats to anyone. Throughout this conversation, Mr. Oliver behaved in a calm and rational manner.

78. While Mr. Oliver was talking, Officer Smith reached into Mr. Oliver's pockets, and then instructed him to be still and to stand against the wall.

79. Officer Smith then handcuffed Mr. Oliver. Mr. Oliver asked if he was under arrest. The officer replied "No." Mr. Oliver then asked why was he being handcuffed. The officer replied that he was taking Mr. Oliver to the hospital.

80. Mr. Oliver stated: "I have constitutional rights." The officer replied: "You don't now."

81. Mr. Oliver was then pushed down the hall, pushed outside, and placed into a police car.

82. Officer Smith then returned to talk with Mr. Oliver's fiancé, and lied to her by stating that Mr. Oliver had agreed to go to Allegiance hospital.

83. Officers Smith and Meyers then drove Mr. Oliver to the hospital, taking a convoluted, non-direct route that scared Mr. Oliver.

84. Defendant Smith's own police report makes no claim that Mr. Oliver was a threat to himself or others, does not indicate that Mr. Oliver was behaving erratically, and provides no independent justification based on personal observation for Mr. Oliver needing an immediate and involuntary mental health examination.

85. Upon information and belief, the actions of Defendants Smith and Meyers are based on a custom and policy of Jackson County to detain citizens for mental examinations without probable cause that they pose a threat to themselves or others.

86. Upon information and belief, Defendants Smith and Meyers have not received adequate training on how to deal with cases raising the possibility of mental health evaluations.

87. According to Defendant Smith's own account, Mr. Oliver was detained "due to the fact that there are claims being made by this college that he made threats and they have concern for his mental stability."

88. After the police seized Mr. Oliver, Valerie Schuette, the JCC Executive Director of Human Resources, sent a follow-up email advising that Mr. Oliver had been removed from campus but reiterating that: "He is still not to be on campus. If you see him, please contact 911 immediately and then campus security."

**E. Despite A Clean Bill of Mental Health, JCC Continued To Treat Mr. Oliver Suspiciously.**

89. Once at the hospital, Mr. Oliver was stripped and searched.

90. He was interviewed by a social worker, to whom Mr. Oliver explained the situation.

91. Mr. Oliver was also interviewed by a doctor. The Doctor told him he was perfectly fine and told him to get dressed and leave.

92. The social worker denied him the right to leave until she could call Defendant Woods. Dean Woods confirmed to the hospital that Mr. Oliver had made no threats against anyone.

93. Nonetheless, Jackson Community College left in place its No Trespass order against Mr. Oliver. Another email was sent to all staff the day after the MLK holiday (January 18, 2011), again telling people to call 911 if they saw Mr. Oliver.

94. On or about January 24, 2011, Mr. Oliver was allowed to return to campus. Despite no documented threats, no finding of mental problems by the doctor (or evidence of any past mental health issues), the school conditioned Mr. Oliver's return to campus on regular meetings with a social worker.

95. Eventually, Mr. Oliver returned to campus. However, fellow students would stand up when he sat down near them, and Mr. Oliver always was worried for his own safety. The local press (T.V. and newspaper) published articles about the incident, and Mr. Oliver was named as the source of an undefined alleged "threat."

96. The stress of those events caused Mr. Oliver's blood pressure to spike while he was on campus, necessitating medical intervention.

97. Mr. Oliver eventually had to stop attending classes and withdrew out of concern for his own health and safety.

98. Mr. Oliver is shattered by his treatment by JCC and the Jackson County Sheriff's Department. He remains shocked that his complaints of racial discrimination could lead to his detention by police and his eventual inability to continue his education. He has had trouble explaining these events to his children, and his children have been taunted in school about the incident.

**Count I**  
**Title VI of the Civil Rights Act – Racial Discrimination**  
**(Against Jackson Community College)**

99. Plaintiff hereby realleges and incorporates by reference paragraphs 1 through 98 above.

100. Plaintiff is African American.

101. Plaintiff was subjected to racial discrimination by faculty and students at Jackson Community College.

102. Jackson Community College refused to appropriately respond to the harassment and then when Mr. Oliver complained about it, banned him from campus and falsely reported to police that he was threatening employees.

103. Defendant's actions against Plaintiff were motivated in significant part based on his race.

104. Defendant's race discrimination was intentional.

105. As a result, Plaintiff was harmed, and continues to be harmed, in that he was deprived of liberty and has suffered damage to professional and personal reputation, emotional distress, humiliation, lost wages, and other damages.

**Count II**  
**Title VI of the Civil Rights Act – Retaliation**  
**(Against Jackson Community College)**

106. Plaintiff hereby realleges and incorporates by reference paragraphs 1 through 105 above.

107. Plaintiff complained about racial discrimination from his teacher and fellow students in a class at JCC.

108. In response to Plaintiff's continued complaints of racial discrimination, the JCC banned him from campus and reported a false threat to the police that directly led to Plaintiff's detention.

109. As a result, Plaintiff was harmed, and continues to be harmed, in that he was deprived of his liberty, has suffered damage to professional reputation, emotional distress, and humiliation, and has experienced lost wages and other damages.

**Count III**  
**42 U.S.C. § 1983: Equal Protection (Race and Sex)**  
**(Against All Defendants)**

110. Plaintiff hereby realleges and incorporates by reference paragraphs 1 through 109 above.

111. Plaintiff is an African-American male who complained about racial discrimination from his teacher and fellow students in a class at JCC.

112. The JCC Defendants refused to appropriately respond to the harassment, and then when Mr. Oliver complained, banned him from campus and falsely reported to police that he was threatening employees.

113. Defendants' actions against Plaintiff were motivated in significant part based on his status as a black male.

114. Defendants' discrimination was intentional.

115. As a result, Plaintiff was harmed, and continues to be harmed, in that he was deprived of liberty and has suffered damage to professional and personal reputation, emotional distress, humiliation, lost wages, and other damages.

**Count IV**  
**42 U.S.C. 1983: Fourth Amendment Violation**  
**(Against Defendants Smith and Meyers and Jackson County Sheriff)**

116. Plaintiff hereby realleges and incorporates by reference paragraphs 1 through 115 above.

117. Plaintiff was seized by Defendants Smith and Meyers.

118. The seizure was done without probable cause that Plaintiff was a threat to himself or others.

119. Defendants Smith and Meyers' actions were part of a custom or policy in Jackson County of seizing citizens for mental examinations without probable cause based on unsubstantiated threats from other governmental authorities.

120. Defendants Smith and Meyers' actions exhibit a lack of training in dealing with cases where a complaining witness alleges threats by an individual.

121. As a result, Plaintiff was harmed, and continues to be harmed, in that he was deprived of his liberty, has suffered damage to professional reputation, emotional distress, and humiliation.

**Count V**  
**Elliott-Larsen Civil Rights Act: Public Accommodation**  
**(Against Jackson Community College)**

122. Plaintiff hereby realleges and incorporates by reference paragraphs 1 through 121 above.

123. Plaintiff is African American.

124. Jackson Community College is an “educational facility” within the meaning of the Act.

125. Plaintiff was denied the full and equal utilization of Jackson Community College based on his race.

126. As a result, Plaintiff was harmed, and continues to be harmed, in that he was deprived of his liberty, has suffered damage to professional reputation, emotional distress, and humiliation.

**Count VI**  
**42 U.S.C. § 1983: First Amendment – Retaliation**  
**(Against All Defendants)**

127. Plaintiff hereby realleges and incorporates by reference paragraphs 1 through 126 above.

128. Plaintiff complained about racial discrimination from his teacher and fellow students in a class at JCC and then complained about how the College handled his initial complaint.

129. Plaintiff was unwilling to drop the complaint for merely an apology from Defendant Coy.

130. In response to Plaintiff’s continued complaints, the JCC Defendants banned him from campus and reported a false threat to the police that directly led to Plaintiff’s detention.

131. As a result, Plaintiff was harmed, and continues to be harmed, in that he was deprived of his liberty, has suffered damage to professional reputation, emotional distress, and humiliation, and has experienced lost wages and other damages.

**COUNT VII: DEFAMATION**  
**(Against JCC, Woods, Coy, Swihart, Adams)**

132. Plaintiff hereby realleges and incorporates by reference paragraphs 1 through 131 above.

133. Defendants falsely represented to the faculty at Jackson Community College and to the police that Plaintiff was a threat and/or had made threats.

134. Defendant knew these statements were false and acted in reckless disregard of the truth or falsity of these statements.

135. Defendants knew, or should have known, that these false statements would cause harm to Plaintiff.

136. The false statements did in fact harm Plaintiff in that he has suffered economic loss, damage to his professional and personal reputation, loss of esteem and standing in his professional community, mental anguish, humiliation and emotional distress

**RELIEF REQUESTED**

WHEREFORE, Plaintiff respectfully requests that this Court award Plaintiff damages in an amount to be determined at trial for Plaintiff's deprivation of liberty and the damage to Plaintiff's professional reputation and emotional distress, together with costs, interest, attorney's fees, statutory penalties, punitive damages, and any other relief that this Honorable Court deems just and proper.

Respectfully submitted,  
NACHT, ROUMEL, SALVATORE,  
BLANCHARD & WALKER, P.C.

Dated: April 5, 2011

s/ Jennifer B. Salvatore \_\_\_\_\_

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**DEMAND FOR JURY TRIAL**

Now Comes Plaintiff, Michael Oliver, by and through his attorneys, Nacht, Roumel, Salvatore, Blanchard, & Walker, P.C. and hereby demands a trial by jury in the above captioned matter.

Respectfully submitted,  
NACHT, ROUMEL, SALVATORE,  
BLANCHARD & WALKER, P.C.

Dated: April 5, 2011

s/ Jennifer B. Salvatore

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