

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MASSACHUSETTS**

CIVIL ACTION #

MICHALE GEDEON,

Plaintiff

Vs.

PLAINTIFF COMPLAINT

LISA DeSousa

Defendant

1. The plaintiff is prose in the above captioned matter. Comes now the plaintiff Michael J-Gideon, who states he resides at 68 Lawndale St. Springfield Ma, 01108 located in Hampden County in the Commonwealth of Massachusetts, Plaintiff Michael J. Gideon, is here in after referred to as the plaintiff.
2. The Defendant is Lisa DeSousa who is a citizen of the United States, resides at and her place of Business is located at 1391 Main St. Springfield, MA, 01103. She is also

employed by the City of Springfield, 36 Court St. Springfield, MA. Further employment is 233 Allen St., Bldg A, Springfield, MA 01108, located in Hamden Country in the Commonwealth of Massachusetts.

3. Pursuant to Exhibit- is a copy of an Affidavit and a substitute affidavit, that the defendant filed with the housing court requesting that a motion be heard to appoint a receiver to the plaintiff property located at 155-157 Oak Grove Ave. Springfield MA, 01109 , see Exhibit referencing properties one which is presently active in this court under case # in dispute.
4. At the time Defendant (the defendant) filed her Affidavit against the Plaintiff to appoint a receiver to a property that did not need a receiver.
5. A receiver was appointed on, or about, March 26 2013, at 155 Oak Grove Ave, Springfield, MA, 01109.
6. All times the defendant made false statements and reports to the courts rather than giving, or telling, the courts the REAL, TRUE "FACTS" About the property or the plaintiff, The plaintiff was Slandered all along the way!
7. Their defendant failed to tell the courts or show the courts that he had entered into a written agreement with the City and the defendant, in December 2012, gave the month as to when he was going to be finished with the work required on the exterior of the house installing siding, See Exhibit referencing the agreement signed by the defendant Lisa DeSousa.

8. The plaintiff filed a civil suit in the District Court to Avail his civil rights, to his home, upon the defendant, Lisa DeSousa. The defendant sent the plaintiff a notice to Appoint a receiver to his home which was not a home for a receivership.
9. Upon sending the defendant a notice of deposition for his other property, (case), the defendant quickly retaliated by requesting a receiver thru the housing court even though the property did not meet the requirements for receivership.
10. The defendant returned and avenged (retaliated) against the plaintiff quickly by filing an affidavit to appoint an unneeded receiver to the plaintiff's 2nd property in order to hurt and cause harm to him and his family knowing her facts are false.
11. The Defendant Slandered the Plaintiff thru the Entire Litigation up to 3-18-16.
12. The defendant told the court Judge that the Plaintiff is a Fire Hazard and posed a danger to the Community, and that his Property draws street gangs around, lot's of disturbances and shootings around the neighborhood etc.. Labeled the Plaintiff.
13. The Defendant has not spoken any truth to the Judge about the Plaintiff, but Slandered the Plaintiff's title, good name, and reputation.
14. The plaintiff seeks A Jury Trial.

JURISDTCTION AND PARTIES

This Courts has Jurisdiction of the within case of Action Pursuant to diversity of Citizenship and the Amount in Controversy,28,U.S.C 1332.

Venue lies in the District of Massachusetts, Pursuant to 28 U.S.C 1391 in that Defendant Lisa DeSousa resides or works in this District

The Plaintiff is Pro se and is attempting to plead his case. The plaintiff asks for consideration from the courts while doing so.

FACTURAL BACK GROWND

The plaintiff repleads and incorporates by reference herein each and every Allegation set Forth Above and Further States as follows,

1. The defendant in her Affidavit to the court branded the plaintiff as a fire Hazard (and more) in an effort to support her Motion to Appoint a receiver and to continue public Embarrassment and Humiliation to the Plaintiff in his neighborhood. In all to obtain an Order from the Judge, Knowing that the property was not a property for receivers ship,
2. The Defendant Lisa DeSousa lied to the Judge on numerous Occasions. March 26 2013, before Judge D.Fien and in between time to October 2013 and April 2014 in between time before Judge D. Fien and Judge R.Fields and thru May/June 2015 thru Nov/Dec 2015, and Jan/Mar 18, 2016 before Judge D.Fien and Judge R. Fields. throughout the litigation She was solely

Defamatory. Defendant statements were false at the time of entry on Affidavit.

3. All allegation was false when made, up until March 18/2016 all Defendant's Accusation Against the Plaintiff and his property were lie's and Defamatory, There is no basis to Publicly Slander the plaintiff and his Family, his reputation through its public web site, See dates of motion heard before the housing court.
4. See exhibits # and dates 3/26/2013 5 /2013 10/20/2013 4/20/2014 and 2/2015 5/15/2015 6/2015 10/2015 11/2015 12/2015 2/2016 3/2016, All and Judgments the plaintiff was slanderer, And the Defendant by the Defendant and the City Officials Inspectors and receivers,
5. Each response was not privileged. She gave her respective false response intentionally notwithstanding their respective knowledge of its Falsity in Reckless disregard of the truth and Negligent.
6. Disregard of the truth, Intending to Injure Plaintiff and steal his Property and deprive him right his good name and Great Community Reputation
7. The City of Springfield each knew or should have know that thir Respective Allegations were false at the time of the court hearing, The city Attorney knew her Allegation was false untrue Illegal and Harmful, Defendant intentionally Slandered the Plaintiff name into altered state in order to facilitate her plan,
8. The defendant untrue allegation to the judge directly and

proximate caused plaintiff Damages by Virtue of his lost of Reputation ,Shame, Mortification, Hurt, feeling Stress, Damage to his property and Occupation, Family Friends and Community

9. The defendant is Liable for the Conduct of her Action each by Virtue of Respondent Superior
10. Wherefore the plaintiff Demands Judgment of and Against the Defendant Lisa DeSousa City Attorney, in the Amount of \$15,000,000 in Exceed of the Minimal Jurisdiction Limits of the court to in Compensatory Damages and Punitive Damage plus Pre-and post Judgment
11. Wherefore the Plaintiff demands a jury trial, and Plaintiff demands the right supplement and amend his complaint.

The Plaintiff is Pro-Se and is attempting to draft his complaint to the best of his knowledge and ability.

The Plaintiff is attempting to point out fraud and conspiracy against the City of Springfield, regarding his property.

Respectfully submitted by,

COUNT 1

1. The Plaintiff restates and re-alleges each and every allegation of the foregoing paragraphs of the within Complaint
2. The Plaintiff states that Defendant Lisa DeSousa violated the Privacy right of the Plaintiff.

WHEREFORE, Plaintiff demands judgment against defendant Lisa DeSousa in an amount to be determined by the court together with interest and cost.

COUNT 2

1. The Plaintiff restates and re-alleges each and every allegation of the foregoing paragraph of within Compliant.

WHEREFORE, Plaintiff demands judgment against Defendant Lisa DeSousa in an amount to be determined by the Court together with interest cost of Court


COUNT 3

1. The Plaintiff restates and re-alleges each and every allegation of the foregoing paragraphs of the within Complaint,
2. The Defendant Lisa DeSousa maliciously abused process in conspiring to have the Plaintiff be put out of his home and making him homeless with malicious intentions of process deprived the

plaintiff Of his right to due process. The defendant took two homes from the Plaintiff in a ten month period by providing false affidavits in order to get a receiver appointed to the defendants properties.

WHEREFORE, Plaintiff demands judgment against the defendant Lisa DeSousa in an amount to be determined by the Courts together with injuries and damages compensable under 42 U.S.C Section 1983 and ask for judgment to be determined in amount by a jury of six jurors for compensatory and Punitive damages, together with Court cost and reasonable Attorney's fees, compensable under 28 U.S.C 1893.

Respectfully submitted by,


68 Landon St 413-355-9965
SAYLE MA
01108

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

1. Title of case (name of first party on each side only) MICHAEL GODEON
VS LISA DE SOUSA

2. Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).

- I. 410, 441, 470, 535, 830*, 891, 893, 895, R.23, REGARDLESS OF NATURE OF SUIT.
- II. 110, 130, 140, 160, 190, 196, 230, 240, 290, 320, 362, 370, 371, 380, 430, 440, 442, 443, 445, 446, 448, 710, 720, 740, 790, 820*, 840*, 850, 870, 871.
- III. 120, 150, 151, 152, 153, 195, 210, 220, 245, 310, 315, 330, 340, 345, 350, 355, 360, 365, 367, 368, 375, 385, 400, 422, 423, 450, 460, 462, 463, 465, 480, 490, 510, 530, 540, 550, 555, 625, 690, 751, 791, 861-865, 890, 896, 899, 950.

*Also complete AO 120 or AO 121. for patent, trademark or copyright cases.

3. Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.

GODEON VS THE CITY OF SPFLD. 4:15CV 3006 KNR

4. Has a prior action between the same parties and based on the same claim ever been filed in this court?

YES NO

5. Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)

YES NO

If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?

YES NO

6. Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?

YES NO

7. Do all of the parties in this action, excluding governmental agencies of the united states and the Commonwealth of Massachusetts ("governmental agencies"), residing in Massachusetts reside in the same division? - (See Local Rule 40.1(d)).

YES NO

A. If yes, in which division do all of the non-governmental parties reside?

Eastern Division Central Division Western Division

B. If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in Massachusetts reside?

Eastern Division Central Division Western Division

8. If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)

YES NO

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME MICHAEL GODEON
ADDRESS 68 LAWRENCE ST - SPFLD - MA 01108
TELEPHONE NO. 413-355-9965