

**RECEIVED BY MAIL****OCT 21 2019**CLERK, U.S. DISTRICT COURT  
DULUTH, MINNESOTA19-cv-2749  
NEB/LIBUNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTAJOSEPH ROBERT GILLIAM - Employee of GRAND CASINO  
(MILLE LAES BAND  
OF OJIBWE)

Plaintiff(s),

vs. ROBIN ROACH  
MIKE ENGEL  
NICK EBERHEART } GRAND CASINO  
RYAN MANLY } EMPLOYEES (MILLE LAES BAND  
OF OJIBWE)  
JESSE HENDOW, DEPUTY SHERIFF / PINE CTY.  
TROY GRIFFITH, DEPUTY SHERIFF / PINE CTY.Case No. \_\_\_\_\_  
(To be assigned by Clerk of District  
Court)DEMAND FOR JURY  
TRIALYES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL plaintiffs  
and defendants in this lawsuit. Please  
attach additional sheets if necessary.)COMPLAINT

## PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

## a. Plaintiff

Name

JOSEPH ROBERT GILLIAM

Street Address

905 FIRE MONUMENT ROAD

County, City

HINCKLEY, MINNESOTA 55037

State &amp; Zip Code

PINE COUNTY

Telephone Number

(320) 384-0666

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

SCANNED

OCT 21 2019

U.S. DISTRICT COURT DULUTH

a. Defendant No. 1

Name

GRAND CASINO ADMINISTRATION  
ROBIN ROACH HEAD OF SECURITY

Street Address

777 LADY LUCK DRIVE

County, City

HINCKLEY, MINNESOTA 55037

State & Zip Code

PINE COUNTY

b. Defendant No. 2

Name

GRAND CASINO ADMINISTRATION  
MICHAEL ENGEL GENERAL MANAGER

Street Address

777 LADY LUCK DRIVE

County, City

HINCKLEY, MINNESOTA 55037

State & Zip Code

PINE COUNTY

c. Defendant No. 3

Name

GRAND CASINO ADMINISTRATION  
NICKOLAS EBERHEART SECURITY Mgr.

Street Address

777 LADY LUCK DRIVE

County, City

HINCKLEY, MINNESOTA 55037

State & Zip Code

PINE COUNTY

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.**

**Check here if additional sheets of paper are attached:** ☒

**Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g., Additional Defendants 2.d., 2.e., etc.)**

## JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of

D. DEFENDANT No. 4

RYAN MANLEY SWINGSHIFT SECURITY MANAGER  
777 LADY LUCK DRIVE  
HINCKLEY, MINNESOTA 55037  
PINE COUNTY

E. DEFENDANT NO. 5

JESSE KENDW DEPUTY/PCSO #408  
635 NORTHRIDGE DRIVE NW SUITE 100  
PINE CITY, MINN. 55063

F. DEFENDANT NO 6.

TROY GRIFFITH DEPUTY/PCSO #415  
635 NORTHRIDGE DRIVE N.W. SUITE 100  
PINE CITY, MINN. 55063

the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question      ☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

42 USC 1983 1986 AND 1988 AND 4<sup>th</sup> AMENDMENT  
TO THE US CONSTITUTION

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

**Attach additional sheets of paper as necessary and label this information as paragraph 5.**

**Check here if additional sheets of paper are attached.**

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

G Defendant(s) reside in Minnesota      G Facts alleged below primarily occurred in Minnesota

G Other: explain

## STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. ON 7/22/2019 <sup>1800 HOUR -</sup> PLAINTIFF, TARDY FOR WORK DUE TO A

VEHICLE PROBLEM, WITH NO ACCESS TO PHONE,  
 RETURNED HOME TO FIND A FORCED ENTRY TO HIS  
 RESIDENCE AND A CARD/MESSAGE LEFT BY DEPUTIES.  
 A 'WELL-NESS CHECK' BY EMPLOYER HAD BEEN EXECUTED  
 WHILE EMPLOYEE (PLAINTIFF) WAS ENROUTE HOME; TO NO  
 AVAIL. PLAINTIFF HAS NO ISSUES AND IS OF SOUND MIND  
 AND CHARACTER. 'WELL-NESS CHECK' HAS NO MERIT AND  
 FORCED ENTRY WAS UNWARRANTED. EMPLOYER AND  
 PLAINTIFF'S RESIDENCE ARE .95 MILES (8 BLOCKS)  
 APART. THE PROXIMITY PLAYS INTO THE 'WELL-NESS CHECK'.  
 AT TIME PLAINTIFF RETURNED (1800) ROBIN ROACH - SECURITY  
 HEAD SHOWED UP AT PLAINTIFF'S RESIDENCE AND EXPRESSED  
 CONCERN FOR PLAINTIFF. UNUSUAL AND NOT A COMMON  
 EMPLOYER PRACTICE. (OPINION) THREE HOURS AFTER  
 PLAINTIFF WAS TO 'CLOCK-IN' AT WORK?

IT APPEARS TO BE CONLUSION BETWEEN EMPLOYER  
 AND AUTHORITIES (POLICE MISCONDUCT). ← OPINION  
 — PLAINTIFF HAS BEEN A PUNCTUAL AND RELIABLE EMPLOYEE  
 FOR GRAND CASINO - 11 YEARS / 69 YEARS OLD AND EXE LENT COND.  
 — PLAINTIFF HAS BEEN A "TAX PAYING" OWNER <sup>HEALTH</sup>  
 AT 905 FIRE MONUMENT RD. FOR 29 YEARS.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

#### REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

PLAINTIFF SEEKING JURY TRIAL ON ALL ISSUES,  
GRANTING COMPENSATORY + PUNITIVE DAMAGES IN EXCESS  
OF \$500,000. IN COMP., PUNITIVE DAMAGES, AND ALL  
OTHER AWARDS AND COSTS WHICH COURT MAY FIND  
PLAINTIFF IS ENTITLED TO. PLAINTIFF TO BE REWARDED  
ATTORNEY FEES, ALL COURT COSTS, INTEREST ON COSTS —

Date:

Signature of Plaintiff

Mailing Address

Telephone Number

Joseph R. Green  
905 FIRE MONUMENT ROAD  
HINCKLEY, MINNESOTA 55037  
(370) 384-0666

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.