

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CAITLIN CHILDS,)	
CHRISTOPHER FREEMAN,)	
)	
Plaintiffs,)	CIVIL ACTION
)	FILE NO. _____
)	
vs.)	
)	
)	
DEKALB COUNTY, GEORGIA,)	
DETECTIVE D.A. GORMAN,)	
individually and in his official)	
capacity as a detective for the)	
Homeland Security Division of))	
Dekalb County, and)	
OFFICER K.A. MOFFIT,)	
individually and in his)	
official capacity as an officer of the)	
Dekalb County Police Department.)	
)	
Defendants.)	

VERIFIED COMPLAINT

COMES NOW Caitlin Childs and Christopher Freeman, the Plaintiffs, and bring this Complaint seeking damages for the violations of their First and Fourth Amendment rights under the United States Constitution and corollary rights under the Georgia Constitution, and for their false imprisonment, false arrest, and harassment by Dekalb County police during and after a lawful protest on public property. As shown more fully below, Plaintiffs were surreptitiously surveiled during

a peaceful protest, and then stopped and arrested for failing to turn over a piece of paper on which they had written the tag number of the Homeland Security officer who was spying on them.

JURISDICTION AND VENUE

1.

This action arises under the authority vested in this Court by virtue of 42 U.S.C. § 1983, 28 U.S.C. § 1331, 28 U.S.C. § 1343 (a)(3), the First, Fourth, and Fourteenth Amendments of the United States Constitution, and pendent jurisdiction pursuant to 28 U.S.C. § 1367 under Article I, § 1, ¶¶ V, VIII of the Georgia Constitution. The actions of defendants were under color of law. Venue is proper in this Court.

PARTIES

2.

Plaintiff Caitlin Childs (“Ms. Childs”) resides in Atlanta, Georgia and is a citizen of Fulton County.