

Pagliara Law Group, P.A.
500 Paterson Plank Rd.
Union City, NJ 07087
Attorney for Plaintiff
By: Nicholas Anthony Pagliara
NJ Attorney ID No. 054712014
office@pagliaralawgroup.com
(201) 470-4181

<p>MOHAMMED A. AHMED</p> <p>Plaintiff</p> <p>v.</p> <p>COUNTY OF HUDSON; HUDSON COUNTY SHERIFF’S OFFICE; JESSICA LALAMA, individually and in official capacity as a Sheriff’s Officer #S0482, JIMMY GONZALEZ, individually, and in his capacity as Sergeant with Hudson County Sheriff’s Office; ABEL CASTILLO, JOSEPH CRINION; JOHN/JANE DOE TRAINING OFFICERS 1-5, in their personal, individual and official capacities;</p> <p>Defendant (s)</p>	<p>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: HUDSON COUNTY</p> <p>DOCKET NO: HUD-L-000723-26</p> <p>Civil Action</p> <p>COMPLAINT, JURY DEMAND, DESIGNATION OF TRIAL COUNSEL and CERTIFICATIONS</p>
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COMPLAINT

Plaintiff, MOHAMMED A. AHMED (“Mr. Ahmed” or “Plaintiff”), residing in the City of Jersey City and the County of Hudson New Jersey with his full address on file with Counsel

by way of Complaint against defendants herein states:

PRELIMINARY STATEMENT

1. On June 10, 2025, at approximately 1:50 a.m., Mohammed A. Ahmed, a law-abiding Lyft driver, was performing his professional duties when he was pulled over by Hudson County Sheriff Officer Jessenia Lalama. What followed was a shocking and humiliating ordeal: he was forcibly removed from his vehicle, publicly embarrassed in front of his passenger, and wrongfully arrested based on warrants issued for another individual (Mohammed Ahmed's father) who shares his first and last name but has a different middle initial and identifying information.

2. Despite clearly informing the officers that he was not the individual named in the warrants, and offering proof of his identity, and the incident report itself confirms the wrong person was arrested and booked, the officers ignored these facts. He was detained overnight, subjected to the indignities of a holding cell, and ultimately transferred to the Jersey City Police Department while being detained before Bail of 10 percent was posted all for a warrant that was not his.

3. This was not a minor error. It was a complete failure of basic law enforcement protocol. The Defendants' reckless and negligent actions caused significant emotional trauma, reputational harm, and financial losses. Mohammed Ahmed's experience exemplifies a preventable violation of his rights under the Fourth and Fourteenth Amendments, as well as under New Jersey civil rights law.

4. Plaintiff now brings this action to hold the County of Hudson and its employees accountable for their unconstitutional, negligent, and reckless conduct. This complaint seeks compensatory and punitive damages for false arrest, malicious prosecution, abuse of process, civil rights conspiracy, unlawful search and seizure, intentional infliction of emotional distress, and negligent hiring, training, and supervision in violation of the Constitution of the State of New Jersey, the New Jersey Civil Rights Act, N.J.S.A. 10:6-1, et seq., and the common law of the State of New Jersey and the emotional and financial harm caused by these preventable failures.

PARTIES

5. Plaintiff Mohammed A. Ahmed is an adult resident of the State of New Jersey and of Indian descent bearing a common Muslim first name.

6. Defendant County of Hudson (“County”) is a public entity organized under the laws of the State of New Jersey and is responsible for the policies, customs, practices, training, supervision, and discipline of the Hudson County Sheriff’s Office and its employees, including the individual defendants named herein.

7. Defendant Hudson County Sheriff’s Office (“HCSO”) is a law enforcement agency of the County of Hudson and, at all relevant times, employed and supervised Sheriff’s Officers and Sergeants acting under color of state law within the scope of their employment.

8. Defendant Jessica Lalama (“SO Lalama”) was, at all relevant times, a Sheriff’s Officer with the Hudson County Sheriff’s Office, badge/shield #S0482. She is sued individually and in her official capacity. At all relevant times, she acted under color of state law and within the

course and scope of her employment with the HCSO.

9. Defendant Jimmy Gonzalez was, at all relevant times, a Sergeant with the Hudson County Sheriff's Office. He is sued individually and in his official capacity. At all relevant times, he acted under color of state law and within the course and scope of his employment with the HCSO, including supervisory review, approval, and ratification of subordinate officers' actions.

10. Defendant Joseph Crinion was, at all relevant times, a member of the Hudson County Sheriff's Office acting under color of state law and within the scope of his employment. He is sued individually and in his official capacity. On or about June 10, 2025, Crinion reviewed and approved the narrative/report associated with Plaintiff despite material inaccuracies and without ensuring that the subject identified in the narrative matched the individual named on the underlying warrant and/or the person stopped, thereby ratifying false and misleading information.

11. Defendant Abel Castillo was, at all relevant times, a member of the Hudson County Sheriff's Office assigned to police communications/dispatch functions. He is sued individually and in his official capacity. Acting under color of state law and within the scope of his employment, Castillo entered and/or transmitted an inaccurate narrative into law-enforcement systems concerning Plaintiff without confirming that the name and identifiers on the warrant matched the individual involved in the traffic stop, contributing to Plaintiff's unlawful seizure and prosecution.

12. Defendants John/Jane Doe Training Officers 1-5 are fictitiously named supervisory and/or training personnel of the Hudson County Sheriff's Office responsible for instruction,

oversight, and compliance regarding warrant verification, identity confirmation, report writing, and supervisory approval. They are sued individually and in their official capacities. Their true names and roles are presently unknown and will be substituted upon discovery.

13. At all relevant times, the individual defendants acted under color of state law and within the course and scope of their employment with the Hudson County Sheriff's Office and County of Hudson. Their acts and omissions were undertaken pursuant to and/or caused by the policies, customs, practices, failures to train, supervise, and discipline of the County and HCSO.

VENUE

14. This Court has subject matter jurisdiction over this action pursuant to N.J. Const. Art. VI, § III, 2 and N.J.S.A. 2B:2-1, as this action asserts claims arising under the Constitution and laws of the State of New Jersey and the common law.

15. Venue is proper in the Superior Court of New Jersey, Law Division, Hudson County, pursuant to R. 4:3-2(a), because the causes of action arose in Hudson County, the events and omissions giving rise to the claims occurred in Hudson County, and Defendants County of Hudson and Hudson County Sheriff's Office are public entities located in Hudson County.

16. At all relevant times, the individual defendants were employed by and acting within the course and scope of their employment with the Hudson County Sheriff's Office in Hudson County, New Jersey, and the acts and omissions complained of occurred in this vicinage.

NOTICES OF CLAIM

17. Plaintiff served a Notice of Claim for damages in the form prescribed by New Jersey

Statutes Title 59:8-4 upon the Defendants.

18. On August 1, 2025, Plaintiff filed a Notice of Claim with the Defendants setting forth the facts underlying Plaintiffs claim against the Defendants.

19. More than six (6) months have elapsed since Plaintiff's Tort Claim Notice was served and the claims remain unresolved.

20. This action commenced within two (2) years of the date of the occurrence, giving rise to the Complaint.

FACTS COMMON TO ALL COUNTS

21. On or about June 10, 2025, at approximately 1:50 a.m., Plaintiff was lawfully operating his vehicle as a Lyft driver with a passenger present.

22. While driving near Westside Avenue and Glenwood Avenue, Jersey City, Officer Lalama initiated a traffic stop of Plaintiff's vehicle.

23. Sheriff Officer Lalama was patrolling the area of Lincoln Park in Jersey City in Marked vehicle SO 97 and did a random inquiry on Infocop on a Black 2020 Toyota Camry with NJ plate ending in NKN.

24. Infocop indicated that the owner of the vehicle, Mr. MOHAMMED A. AHMED (DL:*****731/ ADDRESS: 40 LOGAN AVENUE 1ST FLOOR, JERSEY CITY, NJ, 07306 / and his DOB), had a suspended and expired driver's license. This is the first red flag where Defendants had notice of the mistaken identity and did not have

probable cause to effectuate an arrest for a warrant that was not Plaintiff. Defendants were reckless with ascertaining if they had the right person more than once.

Plaintiff has a different middle initial and Date of Birth than the other Mohammed with the outstanding warrant which was his father.

25. S.O. Lalama informed Plaintiff he was being arrested based on outstanding warrants issued by Jersey City Municipal Court . (CASE NUMBER: SF2018333945 - \$1000–FAILURE TO APPEAR / CASE NUMBER: SF2019359784 - \$100 – FAILURE TO APPEAR) However, Plaintiff did not have active warrants out of Jersey City Municipal Court at the time of the traffic stop and arrest.

26. Plaintiff immediately and repeatedly informed the officers that he was not the individual named in the warrants and that the warrants were issued to another individual with the same first and last name but a different middle initial and other identifying information. Plaintiff's middle initial is “A”. and the warrant is a person named in the warrant has a middle initial of “I”.

27. Documentary evidence as reflected by Judicial notice to reflects this assertion and is substantiated with the Municipal Court warrant itself in Jersey City Municipal Court (0906) Warrant Number SF 2018 **3945 with an Issue Date of March 29, 2018 issued by and signed by Chief Judge Ramy A. Eid with a Defendant name of Mohammed I Ahmed. **(EXHIBIT A)**. This is the second red flag where Defendants had notice of the mistaken identity and did not have probable cause to effectuate an arrest for a warrant that was not Plaintiff.

28. Despite Plaintiff’s statements and the availability of identifying information (including middle initial, date of birth, and photo identification), the officers failed to

confirm his identity before arresting him, failed to require warrant identifier confirmation (DOB/middle/ SBI/photo), failed to run fingerprint or SBI verification before booking and relied on the practice of arresting on name-only hits thus having no probable cause.

29. The third red flag is shown where Defendants had notice of the mistaken identity and did not have probable cause to effectuate an arrest for a warrant that was not Plaintiff in their own Incident Report Form that was created by SO Lalama and Abel Castillo Police Dispatch and then approved by Joseph Crinion based on inaccuracies and unverified information **(EXHIBIT B)**. The Hudson County Sheriff's Office's own incident report itself on page one lists Mohammed "A." Ahmed as the person they stopped for the traffic stop which is true but is inconsistent and contradicts the pending warrant middle name differential of Mohammad "I." Ahmed that Plaintiff was arrested on.

30. S.O. Lalama's road supervisor, Sgt. Jimmy Gonzalez, was on scene for assistance in marked vehicle S.O. 302 and he did not vet and verify the warrant information with the information of the Plaintiff and instead ratified and approved the arrest and booking and detainment of Plaintiff.

31. Plaintiff was placed in custody, transported to the Hudson County Sheriff's Office, detained in holding cell #4, and later transferred to the Jersey City Police Department. He remained in custody until approximately 4:00 p.m. the following day when bail was posted which is interesting because the Bail documentation identified the warrant subject (Mohammed I. Ahmed), further confirming Plaintiff was not the person named in the warrant. posted was not even in Plaintiff's name because the warrant he was booked on was his father.

32. Plaintiff suffered loss of income due to missed work driving for LYFT, emotional Distress, freedom, humiliation in front of a customer, reputational harm, and other damages.

33. The officers' actions were negligent, reckless, and taken under color of law without proper legal justification.

34. Plaintiff did not at any time have outstanding warrants, and the arrest constituted a clear case of mistaken identity and the fourth time Defendants had notice and no probable cause was the middle name initial on his driver license was not the same as the alleged outstanding warrant.

CAUSES OF ACTIONS

FIRST COUNT

FALSE ARREST

42 U.S.C. §1983 and N.J.S.A. 10:6-2)

(As to all Defendants)

35. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

36. This cause of action is brought by Plaintiff Mohammed A. Ahmed against Defendants for falsely arresting Plaintiff under color of law, which deprived Plaintiff of his rights under N.J.S.A. 10:6-1 et seq., the New Jersey Constitution, and the United States Constitution.

37. At all times material, Plaintiff had the constitutional right and statutory right to be free from unlawful arrest, false imprisonment, and deprivation of liberty without due process of law and without probable cause and without legal justification, under the Fourth and Fourteenth Amendments to the U.S. Constitution, and under the New Jersey Civil Rights Act, N.J.S.A.

10:6-2.

38. On or about June 10, 2025, while Plaintiff was operating his vehicle as a rideshare driver for LYFT, Defendant Lalama, acting in her official capacity and under color of law, intentionally arrested Plaintiff for outstanding warrants that were issued for another individual with a different middle initial, despite Plaintiff repeatedly identifying himself and providing clear proof that he was not the subject of the warrants.

39. Sgt. Jimmy Gonzalez and other supervisory officers failed to intervene or verify Plaintiff's identity and ratified and encouraged the arrest, demonstrating deliberate indifference to Plaintiff's clearly established constitutional rights.

40. As a direct and proximate result of Defendants' illegal acts, Plaintiff was detained in a holding cell, handcuffed, his vehicle was towed, and custody was transferred to the Jersey City Police Department, causing Plaintiff severe emotional distress, humiliation, loss of freedom, reputational harm, financial loss, and interference with his work as a rideshare driver.

41. The acts of Defendants were intentional, reckless, wanton, malicious, and oppressive, demonstrating conscious disregard for Plaintiff's civil and constitutional rights, and thereby entitling Plaintiff to punitive damages.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

- c. An award of attorneys' fees and costs; and
- d. Such other and further relief as the Court deems just and equitable.

SECOND COUNT
FALSE IMPRISONMENT
(As to all Defendants)

42. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

43. Defendants falsely imprisoned Plaintiff Mohammed Ahmed by arresting and detaining him on June 10, 2025, for alleged outstanding warrants that were issued for another individual with a different middle initial and other identifying information.

44. Plaintiff immediately identified himself, provided documentation proving that he was not the subject of the warrants, and repeatedly protested his innocence, but Defendants refused to verify his identity and deliberately proceeded with the arrest and detention, including transporting him to Hudson County Sheriff's Office holding cell #4 and then turning custody over to Jersey City Police Department.

45. As a direct and proximate result of Defendants' actions, Plaintiff suffered severe emotional distress, mental anguish, humiliation, loss of freedom, reputational harm, and financial loss, including lost income as a rideshare driver, towing and other incidental expenses, and interference with his ability to work.

46. The conduct of Defendants was intentional, reckless, malicious, and oppressive,

demonstrating a conscious disregard for Plaintiff's constitutional rights under the Fourth and Fourteenth Amendments, as well as his rights under the New Jersey Civil Rights Act, N.J.S.A. 10:6-1 et seq.

47. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff continues to suffer ongoing psychological distress, anxiety, and fear of future unlawful arrests.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

- a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;
- b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;
- c. An award of attorneys' fees and costs; and
- d. Such other and further relief as the Court deems just and equitable.

THIRD COUNT
MALICIOUS PROSECUTION
(As to all Defendants)

48. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

49. Defendants without provocation, justification, permission, or lawful cause, maliciously instituted criminal proceedings against Plaintiff Mohammed Ahmed by initiating a

false arrest and processing him for alleged outstanding warrants that were issued for another individual with a different middle initial and other identifying information.

50. Plaintiff immediately identified himself, provided documentation demonstrating that he was not the person named in the warrants, and repeatedly protested his innocence. Despite these clear indicators of mistaken identity, Defendants intentionally pursued the criminal process, including booking, fingerprinting, photographing, and detaining Plaintiff, without probable cause or verification.

51. As a direct result of Defendants' malicious prosecution, Plaintiff was subjected to unnecessary criminal proceedings, detention, humiliation, and public exposure, including lost income, towing costs for his vehicle, and interruption of his professional duties as a rideshare driver.

52. Defendants' actions were undertaken with malice, willful disregard, and reckless indifference to Plaintiff's clearly established constitutional rights under the Fourth and Fourteenth Amendments, as well as his rights under the New Jersey Civil Rights Act, N.J.S.A. 10:6-1 et seq.

53. The criminal proceedings against Plaintiff were resolved in his favor, because the warrant is not in his name further establishing that Defendants acted without probable cause and for improper purposes. This is shown by the document themselves when the Police incident report related to the initial stop related to the license and how the middle name listed there is contradicted by the name listed on the warrant he was arrested on.

54. As a proximate result of Defendants' malicious and unlawful acts, Plaintiff has suffered severe emotional distress, mental anguish, financial damages, loss of liberty,

reputational harm, and ongoing psychological trauma, and continues to experience fear of future unlawful arrests and government misconduct.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

FOURTH COUNT

42 U.S.C. § 1983 MALICIOUS PROSECUTION

(As to all Defendants)

55. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

56. At all times relevant, Defendants Hudson County Sheriff Officer Jessenia Lalama, Sgt. Jimmy Gonzalez, and John Does 1–5 were acting under color of law and within the scope of their official duties as employees and agents of the Hudson County Sheriff's Office.

57. Defendants initiated, continued, and caused the prosecution of Plaintiff by arresting and processing him on June 10, 2025, for alleged outstanding warrants that were not issued for Plaintiff, but for another individual with a similar first and last name and a different

middle initial, date of birth, and identifying information.

58. Plaintiff immediately informed Defendants that he was not the subject of the warrants and provided identification and other information establishing his innocence. Defendants deliberately ignored these facts and proceeded with the arrest, booking, fingerprinting, photographing, and detention of Plaintiff.

59. Defendants acted maliciously and without probable cause, intending to subject Plaintiff to criminal prosecution despite knowing, or with reckless disregard for, the fact that he was innocent.

60. As a direct result of Defendants' actions, Plaintiff was detained overnight in holding cell #4, transferred to the Jersey City Police Department, and subjected to the indignities of incarceration, including loss of liberty, emotional distress, humiliation, and reputational Harm.

61. The criminal proceedings were ultimately resolved in Plaintiff's favor, confirming that the prosecution was initiated without probable cause and that Defendants' actions were improper and unconstitutional.

62. Defendants' conduct violated Plaintiff's clearly established constitutional rights under the Fourth Amendment (protection against unlawful seizure) and the Fourteenth Amendment (due process), and gives rise to liability under 42 U.S.C. §1983.

63. As a proximate result of Defendants' §1983 violations, Plaintiff has suffered severe emotional distress, mental anguish, loss of income, loss of liberty, reputational harm, and ongoing psychological trauma, and will continue to suffer such damages in the future.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

FIFTH COUNT
CIVIL RIGHTS CONSPIRACY (42 U.S.C. §1983 / NJCRA)
As to all Defendants

64. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

65. The acts of Defendants constitute a conspiracy to deprive Plaintiff of his civil rights under 42 U.S.C. §1983, the New Jersey Civil Rights Act, N.J.S.A. 10:6-2, and the New Jersey Constitution.

66. In furtherance of this conspiracy, Defendants agreed amongst each other to **arrest**, detain, and prosecute Plaintiff on outstanding warrants that were issued for another

individual, despite Plaintiff's repeated protests and presentation of identifying information proving he was not the subject of the warrants.

67. Defendants acted maliciously, willfully, and under color of law, intending to deprive Plaintiff of his constitutional rights to liberty, due process, and protection against false arrest.

68. As a direct and proximate result of Defendants' conspiracy, Plaintiff has suffered severe emotional distress, humiliation, loss of income, loss of freedom, reputational harm, and deprivation of his rights under federal and state law.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

- a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;
- b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;
- c. An award of attorneys' fees and costs; and
- d. Such other and further relief as the Court deems just and equitable.

SIXTH COUNT
UNLAWFUL SEARCH AND SEIZURE (Fourth Amendment / NJCRA)
As to all Defendants

69. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

70. At all relevant times, Defendants acted under color of law and within the scope of their employment with the Hudson County Sheriff's Office.

71. Defendants conducted an unlawful seizure of Plaintiff and his vehicle on June 10, 2025, without probable cause, by stopping him while driving for LYFT, ordering him out of the vehicle, towing his car, and detaining him in a holding cell.

72. Defendants failed to verify Plaintiff's identity, ignored clear evidence of mistaken identity, and subjected him to detention and processing procedures normally reserved for actual subjects of the warrants, violating his rights under the Fourth and Fourteenth Amendments and N.J.S.A. 10:6-2.

73. As a proximate result of the above, Plaintiff has suffered loss of liberty, emotional distress, embarrassment in front of a paying passenger, and reputational harm, and continues to experience psychological trauma.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

- a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;
- b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;
- c. An award of attorneys' fees and costs; and
- d. Such other and further relief as the Court deems just and equitable.

SEVENTH COUNT

42 U.S.C. § 1983 Supervisor Liability Negligent Training/Failure to Supervise As to all Supervisory Defendants

74. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

75. At all relevant times, Defendants Hudson County, the Hudson County Sheriff's Office, Joseph Crinion, supervisory officers including Sgt. Jimmy Gonzalez, and John Jane/Doe Supervisors and Training Officers (collectively "Supervisory Defendants") were responsible for establishing policies, training, supervision, and discipline governing warrant verification, identity confirmation, and arrest procedures.

76. Supervisory Defendants owed a duty to ensure that officers were properly trained and supervised to verify warrant identifiers—including name, middle initial, date of birth, and other biometric or identifying data—before effectuating an arrest.

77. Supervisory Defendants were deliberately indifferent to the known and obvious risk of mistaken-identity arrests resulting from inadequate training and supervision regarding warrant verification and identity confirmation procedures.

78. Upon information and belief, prior incidents, complaints, or known risks existed within the Hudson County Sheriff's Office concerning misidentification and improper warrant arrests, yet Supervisory Defendants failed to implement adequate training, policies, or

safeguards specifically but not limited to: failure to require warrant identifier confirmation (DOB/middle/ SBI/photo), failure to run fingerprint or no SBI verification before booking practice of arresting on name-only hits

79. Supervisory Defendants failed to train officers to reconcile discrepancies between warrant identifiers and subject identification, failed to require supervisory verification before booking on warrants, and failed to discipline officers for mistaken-identity arrests.

80. This failure to train and supervise was the moving force behind Plaintiff's unconstitutional arrest and detention without probable cause.

81. Additionally, Defendant Sgt. Gonzalez personally participated in and ratified the constitutional violation by approving the arrest and booking despite clear discrepancies between Plaintiff's identification and the warrant subject.

82. Defendant Sheriff Crinion and Hudson County maintained customs, practices, or policies permitting arrests on warrants without adequate identity verification, amounting to deliberate indifference to constitutional rights.

83. As a direct and proximate result of Supervisory Defendants' deliberate indifference, Plaintiff was falsely arrested, detained, and deprived of liberty in violation of the Fourth and Fourteenth Amendments.

84. Plaintiff suffered damages including loss of liberty, emotional distress, reputational

harm, lost income, and other consequential losses.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

EIGHTH COUNT

NEGLIGENT HIRING, TRAINING, SUPERVISION, AND RETENTION

85. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

86. Defendants Hudson County and the Hudson County Sheriff's Office were negligent in hiring, retaining, supervising, and training Officers Lalama, Gonzalez, Castillo, Crinion and John/Jane Does 1-5, who they knew or should have known were likely to engage in unlawful arrests, detentions, and civil rights violations, including mistaken identity arrests.

87. Defendants Hudson County and the Hudson County Sheriff's Office permitted conditions to exist that facilitated the unconstitutional and reckless conduct directed at Plaintiff.

88. As a direct and proximate result of the foregoing acts and omissions, Plaintiff has suffered emotional distress, loss of income, reputational harm, and deprivation of civil rights,

and continues to experience ongoing psychological and financial harm.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

NINTH COUNT
ABUSE OF PROCESS

89. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

90. The arrest warrants referenced by Defendants were facially valid legal process issued by Jersey City Municipal Court for an individual named Mohammed I. Ahmed, not Plaintiff Mohammed A. Ahmed.

91 After initiating the traffic stop and reviewing Plaintiff's identification, Defendants knew or had actual notice that Plaintiff was not the individual named in the warrants, including but not limited to:

(a) different middle initial;

(b) different date of birth;

(c) differing identifying information available through dispatch and records; and

(d) inconsistencies between the warrant identifiers and Plaintiff's driver's license.

92. Despite this knowledge, Defendants deliberately continued to invoke and apply the warrant process against Plaintiff by:

- (a) formally placing him under arrest on the warrant;
- (b) completing booking paperwork in the warrant subject's name;
- (c) fingerprinting and photographing Plaintiff as the warrant subject;
- (d) detaining Plaintiff overnight in holding;
- (e) transferring custody to another law-enforcement agency; and
- (f) processing bail on a warrant known not to belong to Plaintiff.

93. Defendants' continued use of the warrant process after learning Plaintiff was not the named subject constituted a perversion and misuse of legal process for purposes other than that for which the warrant was issued.

94. Defendants' actions constituted an improper, unauthorized, and perverted use of legal process, intentionally targeting Plaintiff for detention and transport despite multiple red flags of mistaken identity, including:

- a. Plaintiff's immediate protests of innocence;
- b. Identification documents showing a different middle initial and date of birth;
- c. Conflicting information in Defendants' own incident reports versus the warrants; and
- d. On-scene supervisory ratification without verification.

95. The ulterior purposes motivating Defendants' continued use of the warrant process included, inter alia:

- (a) avoiding administrative consequences of admitting mistaken identity;
- (b) justifying an already-initiated arrest decision;
- (c) shifting responsibility to downstream custodial authorities; and
- (d) completing arrest and booking metrics or enforcement objectives unrelated to the lawful execution of the warrant.

96. Defendants' acts were not merely negligent misidentification but a knowing and intentional continuation of legal process against the wrong individual after clear notice of error.

97. As a direct and proximate result of Defendants' abuse of process, Plaintiff was wrongfully detained, humiliated, deprived of liberty, and subjected to criminal processing procedures intended for another person

98. Defendants' conduct was willful, wanton, and malicious, entitling Plaintiff to compensatory and punitive damages.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

TENTH COUNT

42 U.S.C. § 1983 National Origin Discrimination

As to all Defendants

99. Plaintiff re-alleges and incorporates all preceding paragraphs as if fully set forth herein.

91. Plaintiff Mohammed A. Ahmed is a person of Indian national origin with a common Muslim first name and was perceived by Defendants as such.

92. Defendants intentionally treated Plaintiff differently from similarly situated individuals of non-Indian origin and non-Muslim by presuming he was the subject of an unrelated warrant based primarily on ethnic name similarity while disregarding objective

identifying discrepancies.

93. Defendants' arrest and detention of Plaintiff despite clear mismatches in middle initial and date of birth reflected reliance on ethnic profiling rather than neutral identity-verification Procedures.

94. Upon information and belief, Defendants and Hudson County maintained a pattern or practice of treating individuals with common Muslim names as interchangeable for warrant enforcement purposes, resulting in disproportionate mistaken-identity arrests of persons of that origin.

95. Defendants' actions were motivated, at least in part, by Plaintiff's perceived national origin and constituted intentional discrimination in violation of the Equal Protection Clause.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

- a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;
- b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;
- c. An award of attorneys' fees and costs; and
- d. Such other and further relief as the Court deems just and equitable.

ELEVENTH COUNT

**NJ CIVIL RIGHTS ACT (N.J.S.A. 10:6-2) / NATIONAL ORIGIN DISCRIMINATION
As to all Defendants**

96. Plaintiff re-alleges and incorporates all preceding paragraphs as if fully set forth

herein.

97. Defendants, acting under color of law and within the scope of their employment, deprived Plaintiff of his rights, privileges, and immunities secured by the New Jersey Constitution and the NJCRA, including the right to equal treatment under the law, free from discrimination based on national origin. The County and HCSO are liable by ratification. Sgt. Gonzalez, acting in a supervisory capacity, ratified the arrest and booking of Plaintiff despite clear evidence of mistaken identity, thereby endorsing the discriminatory conduct.

98. Defendants deprived Plaintiff of rights secured by the New Jersey Constitution and NJCRA by arresting and detaining him based on perceived national origin and ethnic name rather than verified identity.

99. Defendants' differential treatment included disregarding exculpatory identifiers and presuming Plaintiff was the warrant subject due to his Muslim name and appearance based on his national origin.

100. Such conduct constitutes ethnic profiling and discriminatory enforcement of warrant procedures prohibited by New Jersey law. As a direct and proximate result of the above conduct, Plaintiff has suffered emotional distress, humiliation, physical and psychological harm, loss of income, loss of liberty, and reputational damage, all as a result of Defendants' discriminatory actions.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

TWELFTH COUNT

42 U.S.C. § 1985(3) Conspiracy To Interfere with Civil Rights

As to all Defendants

101. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

102. At all relevant times, Defendants Hudson County Sheriff Officer Jessenia Lalama, Sgt. Jimmy Gonzalez, Castillo, Crinion, John/Jane Does 1–5, and Hudson County (collectively “Defendants”) acted under color of law in carrying out the arrest, detention, and processing of Plaintiff Mohammed A. Ahmed (“Plaintiff”).

103. Upon information and belief, Defendants conspired and agreed with each other to deprive Plaintiff of his constitutional rights by arresting, detaining, and transporting him despite clear evidence and repeated statements that Plaintiff was not the individual named in the outstanding Jersey City Municipal Court warrants.

104. Defendants acted with the intent to interfere with Plaintiff’s civil rights, privileges, and immunities, including:

- (a) The right to equal protection under the law;
- (b) The right to due process of law;

(c) The right to be free from discrimination based on national origin, race, or ethnicity.

105. The conspiracy was evidenced by multiple coordinated acts, including:

- (a) . S.O. Lalama conducting the initial stop and arrest without verifying Plaintiff's identity;
- (b) Sgt. Gonzalez approving the arrest, detention, and booking despite clear discrepancies between Plaintiff's identification and the warrant;
- (c) Officers Castillo, Crinion, and John/Jane Does assisting with the processing, fingerprinting, transport, and booking;
- (d) The Hudson County Sheriff's Office and supervisory officers failing to intervene, investigate, or correct the unconstitutional actions despite being aware of multiple red flags indicating mistaken identity, including the differing middle initial, date of birth, and other identifying information; and
- (e) Coordinating the detention and transport of Plaintiff without confirming his identity with available documentation or judicial authority and were motivated, at least in part, by class-based discriminatory animus against persons of Indian descent origin, and his first name is widely recognized in the United States as a Muslim associated name and is commonly perceived by law enforcement and the public as indicating Muslim identity as evidenced by Defendants' reliance on ethnic name similarity while disregarding objective identity discrepancies and continuing the arrest and detention after notice of mistaken identity.

106. Defendants' actions were intentional, willful, and malicious, undertaken to achieve personal, professional, or institutional objectives, and constituted a concerted effort to deprive Plaintiff of his civil rights and liberties.

107. As a direct and proximate result of the conspiracy, Plaintiff was falsely arrested, detained, humiliated, and subjected to emotional distress, loss of income, loss of liberty,

reputational harm, and other damages.

108. The conspiracy was motivated, at least in part, by Plaintiff's national origin and race/ethnicity, as evidenced by Defendants' targeting of Plaintiff despite immediate identification discrepancies, repeated protests of innocence, and readily available identifying Information.

109. Defendants' coordinated actions, agreement, and ratification of each other's conduct demonstrate a pattern of willful and deliberate disregard for Plaintiff's rights, creating a basis for civil conspiracy liability under 42 U.S.C. § 1985(3).

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

THIRTEENTH COUNT
Intentional Infliction of Emotional Distress
As to all Defendants

110. Plaintiff repeats and reiterates each and every statement made above as if repeated at

length herein in their entirety.

111. Defendants acted intentionally, recklessly, and with conscious disregard of Plaintiff's rights by arresting, detaining, and falsely charging him despite knowing that the warrants were for a different individual.

112. Defendants' actions were extreme and outrageous, including humiliating Plaintiff in front of his LYFT passenger, towing his car, overnight detention, and repeated interrogation and fingerprinting, all without justification or cause.

113. As a direct and proximate result, Plaintiff has suffered severe emotional distress, anxiety, humiliation, post-traumatic stress symptoms, and loss of enjoyment of life, as well as financial and reputational harm.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

FOURTEENTH COUNT
Violation of the NJ Civil Rights Act - N.J.S.A. 10:6-1 to 2
As to all Defendants

114. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

115. The New Jersey Civil Rights Act provides:

“Any person who has been deprived of any substantive due process or equal protection rights, privileges or immunities secured by the Constitution or laws of the United States, or any substantive rights, privileges or immunities secured by the Constitution or laws of this State, or whose exercise or enjoyment of those substantive rights, privileges or immunities has been interfered with or attempted to be interfered with, by threats, intimidation or coercion by a person acting under color of law, may bring a civil action for damages and for injunctive or other appropriate relief.” N.J.S.A. 10:6-2(c).

116. At all relevant times, Defendants Hudson County Sheriff Officer Jessenia Lalama, Sgt. Jimmy Gonzalez, Castillo, Crinion, John/Jane Does 1–5, acting in their official capacities and under color of law, and Hudson County and HCSO deprived Plaintiff of substantive due process and equal protection rights secured by the Constitution and laws of the United States and New Jersey, including the rights to be free from false arrest, unlawful detention, malicious prosecution, and discriminatory treatment based on national origin and was ratified by supervisor Sgt. Gonzalez.

117. Defendants interfered with Plaintiff’s exercise and enjoyment of his rights and privileges by:

- (A) Wrongfully identifying Plaintiff as a person with an outstanding warrant;
- (B) Arresting Plaintiff without probable cause on June 10, 2025 related to a mistaken identity warrant;
- (C) Detaining Plaintiff overnight and transporting him or turning him over to Jersey City to multiple facilities without legal justification;
- (D) Refusing to verify Plaintiff's identity despite repeated protests and presentation of documentation;
- (E) Subjecting Plaintiff to humiliating processing procedures in the presence of bystanders, including his LYFT driver, causing public embarrassment;
- (F) Acting with deliberate indifference to Plaintiff's medical needs, including prescribed medications; and
- (G) Targeting Plaintiff in part because of his national origin, in violation of his equal protection rights.

118. As a direct and proximate result of the above actions, Plaintiff has suffered mental anguish, humiliation, post-traumatic stress, anxiety, physical symptoms including elevated blood pressure, deprivation of liberty, reputational harm, and emotional distress.

119. Defendants' actions were intentional, willful, wanton, and oppressive, demonstrating reckless disregard for Plaintiff's rights, and entitling Plaintiff to punitive damages.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

FIFTEENTH COUNT

Punitive Damages

As to Individual Defendants

120. Plaintiff repeats and reiterates each and every statement made above as if repeated at length herein in their entirety.

121. . The acts of the individual Defendant Officers and Supervisors, as described above, were willful, wanton, malicious, and oppressive, carried out with reckless disregard for Plaintiff's constitutional rights, and demonstrate a conscious disregard for the law and Plaintiff's safety.

122. By reason of this conduct, Plaintiff is entitled to an award of punitive damages against the individual Defendants in their personal capacities and Plaintiff does not seek punitive damages against any municipal or entity defendant, or against any Defendant acting in an official capacity, as punitive damages are not permitted under New Jersey law against governmental entities or officials sued in their official capacity.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

- b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;
- c. An award of attorneys' fees and costs; and
- d. Such other and further relief as the Court deems just and equitable.

SIXTEENTH COUNT
RESPONDEAT SUPERIOR (VICARIOUS LIABILITY)

As to County of Hudson and HCSO

123. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

124. At all relevant times, the individual Defendants, including Hudson County Sheriff Officers Jessenia Lalama, Sgt. Jimmy Gonzalez, Castillo, Crinion, and John/Jane Does 1–5, were acting within the scope of their employment as employees of Hudson County and the Hudson County Sheriff's Office.

125. While acting within the scope of their employment, these officers committed wrongful acts, including: False arrest; false imprisonment; Malicious prosecution; Abuse of process; deliberate indifference to Plaintiff's rights and medical needs; and discriminatory targeting based on national origin and race/ethnicity.

126. Under the doctrine of respondeat superior, Hudson County and the Hudson County Sheriff's Office are vicariously liable for the tortious acts of their employees committed within

the scope of employment.

127. As a direct and proximate result of the officers' tortious conduct, Plaintiff suffered damages, including loss of liberty, emotional distress, humiliation, reputational harm, and other compensatory damages.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

- a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;
- b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;
- c. An award of attorneys' fees and costs; and
- d. Such other and further relief as the Court deems just and equitable.

SEVENTEENTH COUNT
DEPRIVATION OF THE RIGHT TO BE LEFT ALONE
IN VIOLATION OF NEW JERSEY CONSTITUTION and
N.J.S.A. 10:6-2 73.
Against all Defendants

128. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

129. The New Jersey Constitution, including Article I, Paragraphs 1 and 7, secures every citizen the right to privacy and to be left alone from unreasonable governmental intrusion,

harassment, or interference with personal autonomy.

130. At all relevant times, Defendants Hudson County Sheriff Officer Jessenia Lalama, Sgt. Jimmy Gonzalez, Castillo, Crinion, John/Jane Does 1–5, acting in their official capacities and under color of law, and Hudson County and the Hudson County Sheriff’s Office, intentionally and recklessly interfered with Plaintiff’s right to be left alone.

131. Defendants’ actions included, without limitation:

- (A) Wrongfully identifying Plaintiff as the subject of outstanding warrants issued to another individual with the same first and last name but a different middle initial and date of birth;
- (B) Arresting Plaintiff on June 10, 2025, without probable cause, despite Plaintiff’s repeated protests and presentation of identifying information demonstrating mistaken identity;
- (C) Detaining Plaintiff overnight and transporting him to multiple facilities, including the Hudson County Sheriff’s Office and turning him over to Jersey City Police Department, without legal justification;
- (D) Failing to verify Plaintiff’s identity using available information, including middle initial, date of birth, and photo identification;
- (E) Subjecting Plaintiff to humiliating public processing procedures, including fingerprinting, photographing, and booking, in the presence of bystanders, including a LYFT passenger, causing public embarrassment;
- (F) Acting with deliberate indifference to Plaintiff’s medical needs, including prescribed medications; and

(G) Targeting Plaintiff, in part, because of his national origin, in violation of his right to equal protection and personal autonomy.

132. Defendants' actions were knowing, intentional, willful, wanton, and oppressive, demonstrating a reckless disregard for Plaintiff's rights to privacy, dignity, and personal autonomy.

133. Plaintiff repeatedly alerted Defendants to the mistaken identity at multiple stages of the arrest, detention, and booking process. Defendants failed to take corrective action, despite clear notice of multiple red flags indicating that Plaintiff was not the individual named in the warrants, thereby further compounding the intrusion upon Plaintiff's right to be left alone.

134. As a direct and proximate result of Defendants' conduct, Plaintiff suffered severe emotional distress, mental anguish, humiliation, anxiety, post-traumatic stress, elevated blood pressure, loss of liberty, reputational harm, and other damages.

135. Defendants' actions were ratified by on-scene supervisor Sgt. Jimmy Gonzalez, who approved and endorsed the officers' misconduct despite having knowledge of the mistaken-identity and unconstitutional nature of the arrest and detention.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of

Defendants;

- c. An award of attorneys' fees and costs; and
- d. Such other and further relief as the Court deems just and equitable.

EIGHTEENTH COUNT
MUNICIPAL LIABILITY and Monell
42 U.S.C. § 1983 & New Jersey Civil Rights Act N.J.S.A. § 10:6-2 et seq.
As to County and HCSO

136. Plaintiff repeats and realleges each and every allegation made in the above paragraphs of this complaint.

137. At all relevant times, the individually named Defendants, including Hudson County Sheriff Officers Jessenia Lalama, Sgt. Jimmy Gonzalez, Castillo, Crinion, and John/Jane Does 1–5, were acting under color of law within the scope of their employment with Hudson County and the Hudson County Sheriff's Office.

138. The unconstitutional acts committed by these officers — including false arrest, unlawful detention, abuse of process, deprivation of due process and equal protection, and targeting based on national origin and race/ethnicity — were carried out pursuant to or ratified by:

(a) . A municipal policy, practice, or custom of failing to properly verify identity and warrants before effectuating arrests;

(b) A municipal policy, practice, or custom of inadequate supervision, training, or discipline of officers in conducting stops, arrests, detentions, and processing; and/or

(c) Ratification by supervisory officials, including Sgt. Jimmy Gonzalez, of the unconstitutional conduct despite notice of Plaintiff's protests and available identifying information.

139. Defendants Hudson County and HCSO were deliberately indifferent to the risk that their policies, practices, or lack of training and supervision would result in violations of constitutional and civil rights, including those secured under §1983 and the NJCRA.

140. As a direct and proximate result of these policies, practices, customs, and ratification, Plaintiff suffered loss of liberty, emotional distress, humiliation, reputational harm, anxiety, elevated blood pressure, and other damages.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, for:

a. An award of compensatory damages for emotional distress, lost income, reputational harm, loss of freedom, and other financial losses;

b. An award of punitive damages for the reckless, intentional, and malicious conduct of Defendants;

c. An award of attorneys' fees and costs; and

d. Such other and further relief as the Court deems just and equitable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order providing

relief against all named (and not named yet) Defendants jointly and severally In all capacities for:

- (A) Compensatory damages
- (B) Statutory damages, if applicable;
- (C) Damages for any medical bills
- (D) Damages for humiliation, pain and suffering, mental and emotional distress, loss of enjoyment of life and relationship with children;
- (E) Damages for loss of freedom
- (F) Punitive damages and or liquidated damages where permitted by law;
- (G) Attorneys' fees and costs of suit;
- (H) Such other, further and different relief as the Court deems fitting, just and proper.

Dated: February 23, 2026

PAGLIARA LAW GROUP, P.A.
Attorney for Plaintiffs

By: /s/ Nicholas Anthony Pagliara, Esq.

JURY DEMAND

Plaintiff hereby demands a Trial by a Jury on all of the uses contained herein.

DESIGNATION OF TRIAL COUNSEL

Nicholas Anthony Pagliara is hereby designated as trial counsel for the Plaintiff.

R. 4:5-1 CERTIFICATION

I certify that the matter in controversy in the within action, is not, as far as I am aware, the subject of any other action pending in any court or of a pending arbitration proceeding and that no such action or arbitration proceeding is contemplated. I further certify that I am not aware of any other parties who should be joined in this action at this time. If, however, any such matter or non-party later becomes known to me, an amended certification will be filed and served upon all other parties and filed with this Court in accordance with R. 4:5-1(b)(2).

CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7(c)

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with R. 1:38-7(b).

/s/ Nicholas A. Pagliara

Nicholas A. Pagliara

Attorney for Plaintiff