

2484CV2455

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Armani Doshi
Plaintiff

v.

Boston Animal Care and Control Department, Officer Patti (Badge #113), Veris Residential, and
Massachusetts State Police Logan Airport Barracks (Troop F)
Defendants

2024 SEP 25 P 12:00
JOHN J. CONNORS III
DISTRICT CLERK
DISTRICT COURT
DORCHESTER COUNTY
DORCHESTER

AMENDED COMPLAINT FOR BENCH TRIAL

I. INTRODUCTION

1. Plaintiff Armani Doshi, representing themselves, brings this action against Defendants Boston Animal Care and Control Department, including Officer Patti (Badge #113), Veris Residential (property management of Portside at East Pier), and the Massachusetts State Police for violations under Massachusetts General Laws, Chapter 93A, Section 9, and 940 C.M.R. § 3.16(2), prohibiting unfair and deceptive acts, and Massachusetts General Laws, Chapter 272, Section 77, addressing false accusations of animal cruelty. These violations include improper investigation, false allegations of animal cruelty, the unlawful acquisition and use of Plaintiff's personal information, and coercive attempts to force Plaintiff into licensing their dog with the city under duress. Plaintiff seeks compensatory and punitive damages, along with injunctive relief.

2. The events giving rise to this lawsuit occurred on September 11, 2024, when Officer Patti of Animal Control, escorted by State Police, visited Plaintiff's residence and initiated an unsubstantiated investigation into the care and vaccination status of Plaintiff's German Shepherd dog, Savannah. Plaintiff alleges that the investigation was based on misleading or false information and that Officer Patti and the State Police, acting as representatives of the Animal Control office, engaged in deceptive and coercive tactics during the investigation. The actions culminated in attempts to use duress to compel Plaintiff to license their dog. On September 24, 2024, another incident occurred involving coordinated actions by the state police, Veris Residential employees, and a local resident, which constituted harassment, intimidation, and violations of Plaintiff's rights. During this incident, a Veris Residential employee sitting in a white van behind Plaintiff's apartment initiated an argument, falsely accusing Plaintiff of grabbing their dog by the throat. The employee threatened to call the police, leading to a rapid and seemingly prearranged arrival of law enforcement.

II. PARTIES

3. Plaintiff: Armani Doshi, a resident of 50 Lewis St, Apt 508, East Boston, MA 02128, owns a German Shepherd named Savannah and has provided adequate care, including timely vaccinations for the dog. Plaintiff has been subjected to unwarranted accusations and an unlawful investigation by Animal Control, the State Police, and Veris Residential, who have acted in concert to infringe upon Plaintiff's rights.

4. Defendants:

- Boston Animal Control and Officer Patti are sued in their official and individual capacities for their roles in violating Plaintiff's rights.

Boston Animal Care and Control / MA 02118
Ave 4th floor Boston MA 02118

Officer path (badge # 113)
↙ same address

Veris Residential Inc 220 Broadway, suite 305 Lynnfield
MA 01940

Massachusetts state police Logan Airport barracks
(Troop F) 2 Service Rd East Boston MA 02128

- Veris Residential, the property management company of Portside at East Pier, is sued for breach of privacy, retaliation, tortious interference, and defamation.
- Massachusetts State Police are sued for constitutional violations under the Fourteenth Amendment, negligence under Massachusetts General Laws Chapter 231, Section 85, breach of duty, and negligent infliction of emotional distress.

III. JURISDICTION AND VENUE

5. Jurisdiction is proper in this Court under Massachusetts General Laws, Chapter 223, Section 2, which governs venue in civil actions, as the events giving rise to this action occurred in East Boston, Massachusetts.

6. Venue is proper in Suffolk Superior Court under Massachusetts General Laws, Chapter 223, Section 1, because the actions of the Defendants took place in this jurisdiction.

IV. FACTUAL ALLEGATIONS

7. On September 11, 2024, at approximately 10:45 a.m., Officer Patti from Animal Control, escorted by State Police, arrived at Plaintiff's residence, claiming they were responding to a report regarding allegations of animal cruelty. The source of the report was not disclosed.

8. The allegations were false. Plaintiff had complied with all required laws regarding the dog's care.

9. During the investigation, Animal Control, specifically Officer Patti and the State Police, provided conflicting information. They stated that there was video footage of abuse, but when Plaintiff requested to see this evidence, it was never provided, even after multiple requests. Plaintiff was told different things by different individuals, leading to suspicion that the investigation was baseless.

10. On September 11, 2024, at approximately 2:45 p.m., Plaintiff visited the Animal Control office to clarify the investigation. During this visit, Plaintiff was met with evasiveness from the staff, who were unwilling to provide further information or disclose the source of the complaint in a transparent manner. This lack of transparency caused further emotional distress.

11. Coercion and Duress: During the office visit, Plaintiff was informed that the violation could be voided if Plaintiff licensed the dog with the city. Plaintiff had documentation such as the dog's contract, registration, and medical records, showing the dog was fully vaccinated and well cared for. Despite this, the offer to void the violation was made, indicating that the goal was not to protect the animal but to extract financial gain through licensing fees. Plaintiff felt pressured to comply with the demand under duress, and this constitutes an unlawful act of coercion and duress as defined by Massachusetts General Laws, Chapter 265, Section 26, as it involved the use of intimidation to compel Plaintiff to act against their will.

12. Plaintiff believes that this investigation and the actions of Animal Control, specifically Officer Patti, supported by the presence of the State Police, were part of a scheme for unjust enrichment, where city officials exploit residents by making false accusations and then coercing them into licensing or other financial obligations under the threat of legal action.

13. Suspicious Timing of Licensing Demand: Plaintiff acknowledges the legal requirement to license their dog in Massachusetts at six months of age. However, it is highly suspect that Animal Control arrived with state police when Plaintiff's dog was nine months old, shortly after the licensing deadline had passed. Plaintiff questions how Animal Control knew the dog's age and had access to this information, raising concerns that the visit was more of a ploy to pressure Plaintiff into licensing the dog, rather than addressing any legitimate allegations. The citation handed to Plaintiff, with the offer to void it upon licensing, further demonstrates that the visit was focused on financial gain for the city. This action violates Massachusetts General Laws, Chapter 93A, Section 9, which prohibits unfair and deceptive acts, as the true motive behind the visit was not protection but financial coercion.

14. The investigation and accusations were improperly handled from the start. The refusal to provide evidence, along with conflicting and evasive statements, has left Plaintiff unable to challenge the accusations in a fair and just manner. Plaintiff believes this investigation was carried out in bad faith and without regard to proper legal procedure.

15. The events of September 11, 2024, were recorded by Plaintiff, who has video footage of the interaction with Animal Control and State Police when they came to Plaintiff's door.

Additional Allegations: September 24, 2024 Incident

16. On September 24, 2024, Plaintiff took their dog outside when a Veris Residential employee, sitting in a white van parked behind Plaintiff's apartment, accused Plaintiff of grabbing the dog by the throat. The employee yelled at Plaintiff and threatened to call the police. During this exchange, the employee interacted with a female resident on her balcony, who was recording the incident and later admitted she had no experience with handling dogs or training them.

17. The Veris Residential employee admitted to being involved in calling animal control previously. Plaintiff believes this employee obtained personal information about Plaintiff from Veris Residential and potentially shared it with others, contributing to the repeated harassment and baseless accusations.

18. The police arrived almost immediately after the Veris Residential employee's threats, including both Massport and State Police officers, suggesting a coordinated effort to intimidate Plaintiff. Massport police acknowledged that Plaintiff's dog appeared well cared for and stated that no evidence of abuse was present, while State Police intervened and repeatedly interrupted Plaintiff's attempts to explain the situation.

19. Despite showing State Police and Massport Police how Plaintiff handled the dog, demonstrating that no abuse occurred, Plaintiff was continually dismissed. The State Police Sergeant explicitly told Plaintiff that he did not care about Plaintiff's side or what Plaintiff wanted, revealing a clear bias in handling the situation.

20. During the confrontation, the female resident recording the incident admitted that she was not a dog trainer and lacked the qualifications to assess Plaintiff's actions. Despite this, State Police continued to side with her and the Veris Residential employee, refusing to listen to Plaintiff or provide any evidence of wrongdoing.

21. Veris Residential issued a no-trespass order against Plaintiff on September 12, 2024, and forwarded this notice to the third-party firm managing Plaintiff's housing voucher. This action can

jeopardize Plaintiff's housing stability if the situation continues, demonstrating a retaliatory response closely tied to the initial visit from Animal Control.

22. State Police refused to file a report despite assuring Plaintiff they would, further demonstrating negligence and a lack of proper procedure. They also shared personal information about Plaintiff with a passerby, who interjected herself into the situation, made false statements, and referenced an ankle monitor Plaintiff had worn in the past.

23. Throughout the incident, State Police exhibited dismissive and biased behavior, repeatedly cutting off Plaintiff when attempting to question Officer Patti about her actions. State Police prevented Plaintiff from engaging in meaningful dialogue with animal control, obstructing Plaintiff's right to understand the nature of the allegations and the evidence against them.

24. When Plaintiff confronted Officer Patti and asked how she had obtained Plaintiff's personal information during the initial investigation, Patti refused to answer, stating she was not going to talk about it. Patti belittled Plaintiff by insisting that the State Police and Animal Control were trying to help, despite having no answer. Despite this, Patti continued speaking down to Plaintiff as if they were incapable of properly caring for their dog.

25. State Police spoke with Officer Patti of Animal Control during the incident, and Animal Control admitted that they had no evidence of Plaintiff abusing the animal. Despite this admission, State Police and Animal Control continued to withhold information and failed to provide Plaintiff with a clear explanation of the allegations.

V. CAUSES OF ACTION

Count I: Violation of Due Process and Equal Protection (14th Amendment, U.S. Constitution and Massachusetts Constitution)

26. Plaintiff realleges and incorporates by reference all prior allegations.

27. Defendants Massachusetts State Police and Officer Patti violated Plaintiff's constitutional rights through biased investigations, failure to provide evidence, and arbitrary actions against Plaintiff.

Count II: Negligent and Intentional Infliction of Emotional Distress

28. Plaintiff realleges and incorporates by reference all prior allegations.

29. Defendants' conduct caused severe emotional distress to Plaintiff, who was subjected to humiliation, harassment, and false accusations without due cause.

Count III: Defamation (False Statements and Slander) - Against Veris Residential

30. Plaintiff realleges and incorporates by reference all prior allegations.

31. Veris Residential made false statements regarding Plaintiff's behavior and shared personal information with third parties, damaging Plaintiff's reputation.

Count IV: Breach of Privacy (M.G.L. c. 214, § 1B)

32. Plaintiff realleges and incorporates by reference all prior allegations.

33. Veris Residential unlawfully shared Plaintiff's personal information without consent, contributing to the coordinated harassment and investigation.

Count V: Retaliation and Tortious Interference with Contractual Relations

34. Plaintiff realleges and incorporates by reference all prior allegations.

35. Veris Residential issued a no-trespass order shortly after animal control's visit, disrupting Plaintiff's relationship with the housing voucher provider and placing Plaintiff's housing at risk.

Count VI: Breach of Duties under Animal Control Law (M.G.L. c. 140, §§ 137 and 174E)

36. Plaintiff realleges and incorporates by reference all prior allegations.

37. Defendants failed to follow statutory requirements by initiating an investigation based on faulty and incomplete information, failing to provide necessary evidence, and improperly handling Plaintiff's dog during the investigation.

Count VII: Illegal Acquisition and Use of Personal Information (M.G.L. c. 93H and c. 214, § 1B)

38. Plaintiff realleges and incorporates by reference all prior allegations.

39. Defendants unlawfully obtained and used Plaintiff's personal information without consent, violating Plaintiff's privacy rights under Massachusetts law.

Count VIII: Coercion, Duress, and Unjust Enrichment (M.G.L. c. 93A, § 9 and 940 C.M.R. § 3.16(2))

40. Plaintiff realleges and incorporates by reference all prior allegations.

41. Defendants' actions, including attempts to pressure Plaintiff into licensing the dog under false pretenses and threats of legal action, constitute coercion, duress, and a scheme for unjust enrichment, violating Massachusetts consumer protection laws.

VI. RELIEF SOUGHT

42. As a direct and proximate result of the actions of Defendants, Plaintiff has suffered the following damages:

- Emotional Distress: Plaintiff has suffered significant emotional distress due to the false allegations and improper handling of the investigation.
- Reputational Harm: Plaintiff's reputation has been damaged within the community, as neighbors and property management were led to believe that Plaintiff was mistreating their dog.
- Legal Expenses: Plaintiff has incurred expenses in responding to these false accusations and in preparing this legal action.
- Loss of Enjoyment of Life: Plaintiff has been unable to fully enjoy their life due to the anxiety and stress caused by the investigation.

43. Plaintiff seeks the following relief:

- Compensatory damages in the amount of \$1.5 million to cover emotional distress, reputational harm, and legal expenses.
- Punitive damages in the amount of \$1 million to punish Defendants for their willful and malicious conduct.

- Injunctive relief prohibiting Defendants from unlawfully obtaining or using personal information in future investigations.
- A formal public apology from Animal Control, Officer Patti, Veris Residential, and the State Police, acknowledging their mishandling of the case and clearing Plaintiff of any wrongdoing.
- Any other relief the Court deems just and equitable.