

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Roderick Webber, Pro Se Plaintiff, v) Case 1:18-cv-00931-LM
Donald J. Trump, Edward Deck et al.) (Chief Judge Landya McCafferty)
_____ Defendants. _____) July 12, 2019

APPENDIX TO PLAINTIFF’S MEMORANDUM IN REPLY TO JPA III’S MOTION TO
DISMISS

1 TRUMP VIOLENCE

Preceding the No Labels Problem Solvers incident on October, 12, 2015 which occurred at The Radisson Hotel, there were several very high-profile news events in the headlines and on television regarding Defendant Trump and his WWE Wrestling Partner, Keith Schiller, as well as Defendant Edward Deck. As a result, Defendant JPA III knew, or should have known that reckless individuals with a lengthy history of violence and assault would be in attendance at the No Labels Problem Solvers Conference.

A) World Wrestling Entertainment’s Real Violence

Public sentiment seems to be that World Wrestling Entertainment, Inc. (WWE) is “choreographed.”

Public sentiment, however, is immaterial. The Honorable Vanessa L. Bryant in Connecticut District Court has ruled in McCullough v. WWE that there is enough evidence to show that the

violence is real, to the extent that she allowed Plaintiffs Singleton and LoGrasso to proceed. WWE wrestlers sign waivers which frequently prevent them from seeking damages, however, as stated in *McCullough v. WWE*, information contained in the WWE's 2007 Wellness Program showed the WWE was aware that getting in the ring could cause wrestlers permanent degenerative conditions related to head injury and permanent brain damage.

“In particular, the WWE is alleged in the various complaints to have had knowledge of such a link as early as 2005. For wrestlers active during and after 2005, information about a link to permanent degenerative conditions could plausibly have informed plaintiffs' own choices about whether and when to re-enter the ring after sustaining a head injury and could plausibly have prevented permanent brain damage. Plaintiffs also allege that by virtue of its Wellness Program, begun in 2007, WWE possessed superior knowledge regarding a link between participation in WWE wrestling events and such permanent conditions. Because Singleton and LoGrasso are alleged to have wrestled on or after 2005, when WWE's knowledge of the non-disclosed facts is alleged to have begun, their claims for fraudulent non-disclosure may proceed.” *McCullough v. World Wrestling Entm't, Inc.* 172 F. Supp. 3d 528, 566 (D. Conn. 2016)

B) Defendant Trump's acts of Violence on the WWE Seen by Many Millions

Defendant Trump's history of violence as part of the WWE goes back to 1988, and has bragged to that effect.

i) March 28, 2007, Donald Trump hits wrestler Vince McMahon in the lobby of Trump Tower in New York City. Trump's security officer Keith Schiller enters the frame, grabbing Vince McMahon. Schiller and McMahon tussle back and forth until Schiller knocks McMahon to the

ground. McMahon gets back up and there is some more pushing, while Trump looks on, clearly condoning the behavior. Video by Ted Shaffrey. The YouTube video has 174 thousand views.

<https://youtu.be/-9CjKfO6ef0>

ii) June 22, 2009, Defendant Trump slaps wrestler in the face in front of a live audience of thousands of people, and likely to millions of people in their homes. The YouTube video has 6.5 million views. <https://youtu.be/1rDUeqsq54s>

iii) July 19th, 2011, Defendant Trump tackles wrestler Vince McMahon and punches him in the head at least five times, in front of a live audience of thousands of people, and likely to millions of people in their homes. The YouTube video has 13.4 million views. <https://youtu.be/5NsrwH9I9vE>

iv) April 6, 2013, Defendant Trump bragged that his 2013 induction into the WWE hall of fame was, “In front of a record-setting 80 thousand fans in one of the largest pay per view events in wrestle-mania history.”

<https://www.youtube.com/watch?v=eVtyTw8cIEU>

v) Dec 8, 2013, Defendant Trump uses the full force of his 6’2” body and violently pushes Vince McMahon over a table, (similar to the assault on Plaintiff), in front of a live audience of thousands of people, and likely to millions of people in their homes. The YouTube video has 15 million views. The title on the screen bills Defendant Trump as “Donald Trump, Chairman of The Trump Organization.” https://youtu.be/vVeVcVBW_CE

C) The Trump WWE Violence Becomes Part of the Trump Campaign

Defendant Trump has participated in these violent events since 1988, with the stated goal of making people “scared” and “frightened.” The fear which Defendant Trump cultivated through

numerous violent appearances with his wrestling partner Keith Schiller spilled out onto the streets, hurting innocent people as part of his presidential campaign. On September 3, 2015, Schiller forcibly ripped signs away from a protester and punched one in the face, with the assistance of Defendant Edward Deck while in the employment of at least one Donald Trump-related entity. As a result, the former wrestler (Schiller), and Defendant Deck made national headlines.

Defendant Trump was forced to address the incident with the press. The incident moved into the courts known as Galicia v Trump. (SUPREME COURT OF THE STATE OF NEW YORK BRONX COUNTY INDEX NO. 24973/2015E)

https://www.youtube.com/watch?v=_1ymnIROibA

<https://youtu.be/CNT-YRroQ6w>

The story was disseminated in countless publications such as:

a) The Washington Post

<https://www.washingtonpost.com/news/politics/wp/2018/08/21/trump-must-face-claims-of-assault-on-mexican-protesters-judge-says/>

b) The New York Times

<https://www.nytimes.com/politics/first-draft/2015/09/03/guard-for-donald-trump-hits-protester/>

c) The New York Post

<https://nypost.com/2015/09/04/trump-security-team-scuffles-with-immigration-protester/>

d) The New York Daily News

<https://www.nydailynews.com/news/national/trump-security-guard-hits-protester-face-video-article-1.2348516>

e) The Daily Beast

<https://www.thedailybeast.com/trump-tower-protesters-subpoena-president-in-assault-case>

f) Daily Mail

<https://www.dailymail.co.uk/news/article-3222326/Trump-s-security-guards-fight-Mexican-immigrant-50-outside-Trump-Tower-mocked-Donald-s-campaign-slogan-Make-America-Racist-sign.html>

g) Business Insider

<https://www.businessinsider.com/trumps-guard-had-right-to-defend-self-2015-9>

TRUMP SUPPORTERS MAKE HEADLINES FOR BEATING AND URINATING ON HOMELESS MAN

On August 19, 2015, Steve and Scott Leader, two Trump fans made headlines for beating up a homeless man who they also urinated on in the name of Trump.

Boston Globe, August 19, 2015

“South Boston brothers allegedly beat homeless man Police say victim was targeted because he is Hispanic”

<https://www.bostonglobe.com/metro/2015/08/19/homeless/iTagewS4bnvBKWxxPvFcAJ/story.html>

Time Magazine, August 20, 2015

“Donald Trump Cited as Inspiration in Beating of Homeless Latino, Police Say”

<http://time.com/4004579/donald-trump-homeless-hispanic-crime/>

Washington Post, August 21, 2015

“Trump says fans are ‘very passionate’ after hearing one of them allegedly assaulted Hispanic

man”

[https://www.washingtonpost.com/news/morning-mix/wp/2015/08/21/trump-says-fans-are-very-passionate-after-hearing-one-of-them-allegedly-assaulted-hispanic-man/?](https://www.washingtonpost.com/news/morning-mix/wp/2015/08/21/trump-says-fans-are-very-passionate-after-hearing-one-of-them-allegedly-assaulted-hispanic-man/?utm_term=.e030a7600098)

[utm_term=.e030a7600098](https://www.washingtonpost.com/news/morning-mix/wp/2015/08/21/trump-says-fans-are-very-passionate-after-hearing-one-of-them-allegedly-assaulted-hispanic-man/?utm_term=.e030a7600098)

CNN Politics, August 21, 2015

“Donald Trump was right,” the two men said, according to police, as they beat the man with a metal pipe and then urinated on him.”

<https://www.cnn.com/2015/08/20/politics/donald-trump-immigration-boston-beating/index.html>

According to The Massachusetts State Police Facebook Page, (May 16, 2016), the brothers were sentenced to prison, stating:

Subject: Suffolk DA Release 16-090: Brothers Get State Prison Terms for Beating Immigrant

Brothers Get State Prison Terms for Beating Immigrant

BOSTON, May 16, 2016—Two brothers were sentenced to state prison today after admitting that they beat a homeless man last year because they believed him to be an illegal immigrant, Suffolk County District Attorney Daniel F. Conley said.

SCOTT LEADER (D.O.B. 7/20/77) and STEVEN LEADER (D.O.B. 8/5/85) of South Boston pleaded guilty to indictments charging them with causing bodily injury while committing a civil rights violation, assault and battery for purposes of intimidation causing bodily injury, two counts each of assault and battery, and two counts each of assault and battery with a dangerous weapon.

Assistant District Attorney Nicole Rimar recommended that Scott Leader serve four to six years

in state prison followed by probation and that Steven Leader serve three to four years in state prison followed by probation.

Suffolk Superior Court Judge Peter Krupp imposed lighter sentences of three years for Scott Leader and two and one-half years for Steven Leader, with both those sentences followed by three years of probation. Krupp ordered that each defendant's first year of probation must be served at a sober house, but that each defendant may petition for release from that requirement after six months. Krupp also ordered them to serve 20 hours of community service and complete a cultural diversity training program if one exists.

"This unprovoked attack on a sleeping man disgusted every prosecutor, victim advocate, and trooper who worked on it," Conley said. "State prison was the only appropriate sentence."

Prior to sentencing, Rimar read a prepared statement from the victim in which he described being awoken by the men urinating on him and then beating him in the unprovoked attack on Aug. 19, 2015.

"I still feel pain all over my body from this incident," the victim, then 58, wrote. "I don't think my fingers will ever be the same. I came to this country many years ago and worked hard in the farm fields to provide produce to people here. I actually became a permanent resident of this country years ago, although if I had been undocumented I still would not have deserved to be beaten this way."

Had the case proceeded to trial, Rimar would have introduced evidence and testimony to prove that the brothers kicked, punched, and urinated on the victim as he slept near the JFK/UMass MBTA station at about 12:30 that morning. One of them took a metal pole and struck the victim with it repeatedly. The two assailants then walked away laughing, witnesses said.

The victim was transported immediately to Boston Medical Center, where he was treated for a

broken nose, serious bruising across his torso, and other injuries. With the help of civilian witnesses, State Police identified and apprehended the brothers shortly after the attack.

At the State Police barracks in South Boston, the evidence would have shown, Scott Leader made a series of incriminating statements, including that he and his brother “tuned up” an “illegal immigrant,” and that this behavior was acceptable because the victim was homeless and Hispanic.

Michael Coffey was the DA’s assigned victim-witness advocate. The defendants were represented by attorneys Victoria Kelleher and Jessica Tripp.

<https://www.facebook.com/MassStatePolice/posts/1022042091213107>

TRUMP SECURITY CHIEF KEITH SCHILLER, APPEARING ON “CONVERSATIONS WITH RICH SIEGEL”

<https://www.facebook.com/watch/?v=1084579158228692>

Schiller acknowledges he is Director of Security for the Trump Organization, and has worked almost 18 years with Donald J. Trump.

KEITH SCHILLER: I’m a fucking bodyguard... I’m no stranger to putting my hands on people.

Schiller holds up a photo of himself, saying:

KEITH SCHILLER:

You wouldn’t want to meet this guy in a dark alley, I’ll tell you that right now.

Siegel asks about security work.

RICH SIEGEL (INTERVIEWER): When you’re looking in a crowd— What do you look for?

KEITH SCHILLER: He’s got his pants down— his shorts hanging out. That’s always a sign.

RICH SIEGEL (INTERVIEWER): Is that a sign? Have you seen that before?

KEITH SCHILLER: That's what you gotta worry about. He may piss on somebody.

Schiller continues to talk about his security work for the Trump Campaign and the Trump Organization.

KEITH SCHILLER: You know what it is? It comes down to instinct. And its a gut feeling. Over time and over many many years, I think its coupled with just the correctional and the law enforcement experience. Ya know — I can walk into a room, and I can pretty much feel I know who the guys we need to be concerned with.

RICH SIEGEL (INTERVIEWER): You can see them right away?

KEITH SCHILLER: I can feel it. You just know, and again, it's always a gut feeling.

2: RADISSON FRANCHISE INCIDENTS

April 25, 2011 patrons falling down from drunkenness at Glasgow Radisson

https://www.youtube.com/watch?v=kCv2evq8W_Y

April 15, 2007, Fight at Radisson Hotel

<https://www.youtube.com/watch?v=7bjwooJr29c>

Jan 6, 2008 Manchester NH Radisson: A massive swarm of protesters loudly chant to the extent that several police officers must be called to the scene

<https://www.youtube.com/watch?v=mKjLfLDH2H4>

Aug 1, 2011

Heavy drinking at Radisson, Manchester, NH

<https://www.youtube.com/watch?v=H9ZFZqKSrv4>

Sept 7, 2011, arrest at Radisson Hotel in Nashua NH

<https://www.youtube.com/watch?v=yaB1L7jznaQ>

Jan 8, 2013 Woman murdered by husband at Radisson Hotel, Noida

<https://www.youtube.com/watch?v=9kPU9NPIQoU>

Feb 24, 2013 Man arrested at Radisson in Noida, for molesting a girl

<https://www.youtube.com/watch?v=IJtI2syeY0k>

May 2013, Wolfpack Kickboxing Fight Night @ Radisson Athlone

<https://www.youtube.com/watch?v=jU0J00CB2AU>

June 23, 2013, Patrons at Downtown Minneapolis Radisson too drunk to stand

<https://www.youtube.com/watch?v=NeGE89dhOsE>

Nov 15, 2014 Fight Night! Wolfpack Athlone!

<https://www.youtube.com/watch?v=6NTtrczTrtg>

Oct 5, 2015 Wolfpack Fight Night 5th Oct 2013 @ Radisson Athlone

<https://www.youtube.com/watch?v=-Wi5Q0lyI8g>

Nov 20, 2015, Hostages taken at Radisson in Bamako, Mali

<https://www.youtube.com/watch?v=5zPle0eKwg0>

July 17, 2016, Kids caught vandalizing cameras at Radisson Hotel

<https://www.youtube.com/watch?v=QRR0CffeH1Y>

July 29, 2018, Bus accident at Radisson Hotel

<https://www.youtube.com/watch?v=pYKysFde5Hw>

Jan 9, 2019, Street fight at a Radisson Hotel (Kaushambi Delhi)

<https://www.youtube.com/watch?v=wwpDBcQbRzM>

Jan 19, 2019 Man in Santa outfit drunk lying on floor with beer at Radisson Hotel

<https://www.youtube.com/watch?v=G3wiJj0gu9s>

Jan 23, 2019 Multiple women heavily drunk/ performing lewd acts on each other at Radisson

Hotel Padre Island

<https://www.youtube.com/watch?v=y64Rm3GkzKw>

aug 31, 2017: Thirty people arrested for gambling at Ludhiana Radisson Hotel

<https://www.youtube.com/watch?v=raLJnOF0ex0>

July 7, 2018: Prostitution ring busted at Radisson Bnajara Hills

https://www.youtube.com/watch?v=FZbzaVGE_Mc

March 4, 2019

According to the General Manager Bob Seguin at Nashua NH Radisson, multiple safety problems had been reported, and was quoted as saying,

“OSHA did visit us” and “Some (allegations) are true,”

Wayne Saya, the Radisson’s engineering director claims OSHA, in 2018, levied a \$21,000 fine – which he alleged is “the largest known fine in the city’s history” – against the Radisson and its parent company, Afp 105 Corporation

<http://www.nashuatelegraph.com/news/local-news/2019/03/04/nashua-radisson-gm-denies-allegations-of-multiple-violations/>

3 JPA/ HSEM CONTRACT

SEE EXHIBITS: JPA/ HSEM CONTRACT

APPENDIX 4: MANCHESTER POLICE TRACK RECORD

4.A) Manchester Police Officer Michael Buckley participates in beating a man in a bar.

ACCORDING TO ADAM SEXTON reporting for WMUR-TV, (Published to YouTube March 3rd 2010)

Patron of the bar Strange Brew, Chris Micklovich was asked to leave. He asked why, and four off-duty cops beat him up, according to Micklovich. Chief David Mara wanted to investigate injuries.

A witness came forward. Internal investigation

Four officers were at the bar:

- a. Officer Michael Buckley
- b. Officer Jonathan Duchesne
- c. Officer Matt Jajuga
- d. Lt. Ernie Goodno

Source: Chief Mara, Manchester PD, (ACCORDING TO ADAM SEXTON reporting for WMUR)

WMUR-TV - Published on Mar 16, 2010

<https://www.youtube.com/watch?v=E5ebcm8Jgfs>

- e. Attorney General MICHAEL DELANEY clears officers of criminal wrongdoing

https://www.unionleader.com/news/crime/attorney-general-clears-officers-involved-in-strange-brew-incident/article_c4c8a0b4-6748-5401-9eb6-f0f13495db8f.html

- f. Attorney General MICHAEL DELANEY said: **“I also want to say that clearly this situation was not the Manchester police department's finest hour,”** Delaney said. He noted that an

internal affairs review was conducted by Manchester police. He also said, “I recognize the police chief has disciplined officers,” he said. “I was asked to review this matter by the mayor, former County Attorney Bob Walsh and Chief David Mara.”

[https://www.unionleader.com/article.aspx?](https://www.unionleader.com/article.aspx?articleId=a4112c9e-83f7-497e-93c8-0a0b25e16c5f&headline=Pressure+from+Manchester+police+unions+won%27t+halt+Strange+Brew+probe+says+county+attorney)

[articleId=a4112c9e-83f7-497e-93c8-0a0b25e16c5f&headline=Pressure+from+Manchester+police+unions+won%27t+halt+Strange+Brew+probe+says+county+attorney](https://www.unionleader.com/article.aspx?articleId=a4112c9e-83f7-497e-93c8-0a0b25e16c5f&headline=Pressure+from+Manchester+police+unions+won%27t+halt+Strange+Brew+probe+says+county+attorney)

g) Manchester Police Officer Jonathan Duchesne participates in beating a man in a bar.

March 3rd 2010

For details, see 4A.

h. Manchester Police Officer Matt Jajuga participates in beating a man in a bar.

March 3rd 2010

For details, see 4A.

i. Manchester Police Lieutenant. Ernie Goodno participates in beating a man in a bar.

March 3rd 2010

For details, see 4A.

4.B) OFFICER RYAN NARDONE - GUILTY OF SIMPLE ASSAULT (2010)

Manchester NH police officer found guilty of misdemeanor for hitting man in head at bar but jury hung on felony charge

<https://www.unionleader.com/article.aspx?headline=Nardon%20guilty%20of%20simple>

%20assault;%20hung%20jury%20on%20felony
%20charge&articleId=f7f474bd-95f2-4110-8096-45942c217d8e

In May 2010, Nardone was found guilty of simple assault —

<https://www.capecodtimes.com/article/20120129/NEWS/201290337>

https://www.sentinelsource.com/news/state_regional/ag-asked-to-probe-alleged-police-attack/article_f0d80a38-1c74-5f77-a302-ff109caa0b52.html

UnlawfulShield.com @AbolishQI

Manchester NH police officer found guilty of misdemeanor for hitting man in head at bar but jury hung on felony charge: <http://is.gd/chYrE> 4:02 PM - 20 May 2010

4.C) Manchester Police Officer Steven Coco GUILTY of running over Dean Drukker and Noah Hickman (2013)

According to Andy Hershberger reporting for WMUR-TV (Published to YouTube Mar 26, 2014)

Coco struck them from behind in an undercover police SUV.

Drukker suffered a serious head injury and was hospitalized

Hickman had a broken elbow

Judge Jillian Abramson agreed with state's recommendation of 12 months in jail.

She said she did not think that Coco was telling the truth.

<https://www.youtube.com/watch?v=DqKEo71ZTak>

Detective arrested in hit-and-run had been visiting at fellow officer's home

According to MARK HAYWARD and PAT GROSSMITH in the New Hampshire Union Leader
Mar 26, 2013 mhayward@unionleader.com pgrossmith@unionleader.com

“On Tuesday, Manchester police Sgt. Stephen Coco was arrested and arraigned on felony charges stemming from the hit-and-run accident. Immediately, questions arose about why Coco was on Harrod Lane, a quiet, south Bedford residential street of about a dozen homes.”

https://www.unionleader.com/news/crime/detective-arrested-in-hit-and-run-had-been-visiting-at-fellow-officers-home/article_4184e5a4-f001-518e-a781-1d3aed67e756.html

Fired Manchester officer charged in Bedford hit and run to see pension

Anonymous entry in Union Leader, Mar 28, 2013 “

“MANCHESTER - Stephen Coco, the Manchester police sergeant who was fired and arrested following a hit-and-run accident on Friday in Bedford, won't getting his pension right away, but once he does he could be getting about \$37,100 a year.”

https://www.unionleader.com/news/safety/fired-manchester-officer-charged-in-bedford-hit-and-run-to-see-pension/article_4911987f-6cb9-5083-a3e6-0cdfd561eac4.html

4.D) WMUR-TV REPORTS: THREE MANCH COPS FIRED (2018)

Reported Published on Apr 11, 2018

Officer **Steven Cornacchia** fired (Apr 11 2018) after being arrested for conduct after an accident in alleged hit and run crash while off duty.

He was on leave since May of 2017

4.E) Officer Aaron Brown ACCUSED OF SEXUAL ASSAULT also fired

(April 11)— paid leave since Feb 2018. Being criminally investigated

4.F) Detective Darren Murphy of the special investigative drug unit was fired in February 2018.

Being criminally investigated, but unrelated to Brown.

ACCUSED OF SEXUAL ASSAULT

Chief Nick Willard fired Murphy.

WMUR VIDEO <https://www.youtube.com/watch?v=stHbFad89wM>

WMUR PRINT: Police said Cornacchia, an officer with Manchester police since April 2013, struck a 22-year-old woman before 1:20 a.m. as he turned onto West Merrimack Street from Elm Street. <https://www.wmur.com/article/manchester-officer-accused-of-striking-pedestrian-placed-on-leave/9660053>

MANCHESTER PAID \$45,000 FOR COPS ACCUSED OF SEXUAL ASSAULT

According to Mark Hayward written in the Union Leader, Jan 18, 2019

“MANCHESTER — City officials paid \$45,000 to the woman at the center of a months-long investigation into the conduct of fired city police officers Darren Murphy and Aaron Brown, according to court documents.

Former Police Chief Nick Willard fired both officers last year. He fired Murphy, an undercover detective, last February. An internal investigation into Murphy led to a similar investigation regarding Brown, a street-level detective, whom Willard fired in April. Rogers’ attorney, Olivier

Sakellarios, eventually filed a claim letter with the city asserting Murphy and Brown used their status as police officers to coerce Rogers into sex.”

https://www.unionleader.com/news/crime/review-of-evidence-begins-in-manchester-police-officers-sexual-assault/article_8047fa68-d7ea-11e8-b19f-a3bbd5abbb57.html

https://www.unionleader.com/news/crime/manchester-pays-to-woman-who-accused-two-police-officers-of/article_390de4b3-0ead-50c5-ad5a-c9dbc79ac74b.html

According to Carol Robidoux written in Manchester Ink Link (April 11, 2018)

CHIEF NICK WILLARD RELEASED THIS STATEMENT:

“The Manchester Police Department takes every accusation seriously while investigating all allegations made against our officers, and will hold those accountable who commit wrongdoing, as such, Chief Willard terminated two Manchester Police Officers today, Mr. Aaron Brown and Mr. Steven Cornacchia.

Mr. Brown, a former detective who had been employed by the City of Manchester Police Department since July of 2007, had been placed on paid administrative leave beginning February 20, 2018 until his termination today. A criminal investigation will be initiated into Mr. Brown’s actions. The department has consulted with both the Attorney General and County Attorney on this matter and will continue to do so.

Cornacchia/MPD

Mr. Cornacchia has been employed by the City of Manchester Police Department since April, 2013. Mr. Cornacchia was on paid Administrative from May 14, 2017 to May 16, 2017 until he was arrested for Conduct After an Accident, after which he was on unpaid administrative leave pending his court case.”

<https://manchesterinklink.com/2-police-officers-terminated-after-criminal-investigation/>

Cornacchia collapses before sentencing Jan 24 2018

According to Mark Hayward mhayward@unionleader.com written in the Union Leader

<http://201-ulweb.newscyclecloud.com/courts/manchester-police-officer-collapses-minutes-before-expected-guilty-plea-in-hit-and-run-20180123>

4.G) Off-duty police officer charged in early Sunday hit and run in Manchester

According to PAT GROSSMITH in the New Hampshire Union Leader, May 17, 2017

“MANCHESTER — An off-duty city police officer is accused of hitting a woman with his car early Sunday morning and, after checking on her, fleeing the scene of the collision.

Steven Cornacchia, 31, of Manchester was arrested Tuesday and charged with a misdemeanor offense of conduct after an accident. He was released on \$1,000 personal recognizance bail pending a June 20 arraignment in Manchester Circuit Court.”

https://www.unionleader.com/news/crime/off-duty-police-officer-charged-in-early-sunday-hit-and-run-in-manchester/article_39488944-03ad-5a0f-ad4e-b529a89cb0f6.html

4.H) Manchester police officer charged with felony assault on Cape Cod (2014)

According to Mark Hayward written in the New Hampshire Union Leader, sept 10, 2014

“Falmouth police arrested **Christian Horn, 31**, of Chester, NH, on two felony charges stemming from the alleged assault, which took place shortly after midnight on Aug. 24 outside the Sea Crest Beach Resort hotel, Falmouth police Lt. Sean Doyle said.”

<https://www.unionleader.com/news/crime/manchester-police-officer-charged-with-felony->

assault-on-cape-cod/article_162c1af3-96ea-51c6-b11e-378656a83960.html

4.J). Manchester police officer charged in domestic case (2013)

- According to MARK HAYWARD written in the New Hampshire Union Leader. Jul 10, 2013

HOOKSETT — A veteran Manchester police officer was arrested Tuesday and charged with assault on Tuesday, stemming from a domestic-related incident at his Hooksett home in April, Hooksett police said. Police said **William Soucy, 52**, turned himself in to police and was charged with misdemeanor assault. He was booked and released on his own recognizance.

https://www.unionleader.com/news/crime/manchester-police-officer-charged-in-domestic-case/article_3e3fc7f3-9048-5652-912f-262ba61ec9ea.html

4.J). Officer's DWI charge leads to resignation (2012)

- According to SHAWNE K. WICKHAM written in the New Hampshire Sunday News Oct 21, 2012

MANCHESTER — The Manchester police officer charged with driving under the influence after he crashed his personal car into another vehicle on Interstate-93 last week has resigned from the police department. Police Chief David Mara told the New Hampshire Sunday News that **David Connare** submitted his resignation in a letter Friday afternoon. “I accepted it,” Mara said. The chief said his department was awaiting the reports on the Oct. 16 crash from state police, who are doing the investigation.

https://www.unionleader.com/news/crime/officers-dwi-charge-leads-to-resignation/article_09aa89bc-56e8-5802-958f-99b4213aabba.html

4.K) Manchester Police Officer Charged in Domestic Assault (2012)

- According to GRETYL MACALASTER written in the Union Leader Correspondent. Sep 28, 2012

“RAYMOND — A Manchester police officer is facing a misdemeanor simple assault charge after allegedly throwing his wife to the ground during a domestic dispute.

Nathan **Robert Linstad, 34**, formerly of 19 Pond Road in Raymond, has pleaded not guilty to the charges through his attorney, according to court records.

He turned himself in to Raymond police on Sept. 13 after an arrest warrant was issued, and was released on personal recognizance bail with conditions stipulating he is not to possess any firearms, have contact with the victim or use alcohol or other drugs.”

https://www.unionleader.com/news/crime/manchester-police-officer-charged-in-domestic-assault/article_34e0df95-eed0-5222-874a-db163a3fca38.html

4.L) Manchester officer charged in dispute with girlfriend resigns, will keep pension (2019)

According to Emily Brindley ebrindley@journalinquirer.com written in the Journal Inquirer,

“Former **Officer Jason Wagner, 40**, resigned Thursday (March 14th 2019) from the Manchester Police Department. The Manchester Police Department charged him on March 1 with disorderly conduct and second-degree unlawful restraint.

Former Officer Jason Wagner, 40, submitted his letter of resignation Wednesday, becoming effective Thursday.” - Journal Inquirer

https://www.journalinquirer.com/towns/manchester/manchester-officer-charged-in-dispute-with-girlfriend-resigns-will-keep/article_9d4ba328-4737-11e9-bae5-67466d2f8313.html

APPENDIX 5

RETALIATORY ARRESTS BY MANCHESTER POLICE DEPT

5.A). Valentin v Manchester. Manchester Police issue unlawful training memorandum 2011

https://www.aclu-nh.org/sites/default/files/field_documents/valentin_msj.pdf

https://www.aclu-nh.org/sites/default/files/field_documents/valentin_objection.pdf

5.B) Kean v Manchester 2012 Retaliation for wearing a police jacket

<http://www.nhd.uscourts.gov/sites/default/files/opinions/16/16NH022.pdf>

Municipal Liability for Constitutional Violation (Count VI) Kean argues that the City of Manchester is liable for Officer McKenney's purported constitutional violations because it failed to train its officers with respect to the false personation statute. Because Officer McKenney did not violate Kean's First and Fourth Amendment rights, the City of Manchester cannot be liable for having maintained an allegedly unconstitutional policy regarding officer training. As the Supreme Court has observed: [N]either *Monell v. New York City Dept. of Social Services*, 436 U.S. 658 (1978)