

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT
CIVIL DIVISION
No.

TIMOTHY J. MUISE, pro se,
plaintiff,

Vs.

KELLY RYAN,
MCI Shirley Superintendent,
KEITH NANO,
MCI Shirley Deputy Superintendent,
DAVID SHAW,
MCI Shirley IPS Commander,
DAVID HAVENS,
MCI Shirley Disciplinary Officer,
THOMAS PERRY,
MCI Shirley IPS Officer, and
JOHN DOE,
MCI Shirley Co-Conspirator,
defendants,

C O M P L A I N T

STATEMENT OF THE CASE

1. This is an action in the nature of certiorari in which the pro se plaintiff is seeking review of a decision of the Massachusetts Department of Correction (DOC) imposing a disciplinary sanction on the plaintiff, for declaratory judgment seeking the plaintiff's rights in this matter at bar be clearly defined, as well as for damages under 42 U.S.C. ss. 1983 for violations of the plaintiff's civil rights by individual officers/employees of the DOC. These claims are brought on the grounds that the plaintiff was falsely and maliciously charged, in retaliation for his exercise of constitutionally protected rights, with violations of DOC regulations.