

RETURN DATE: JULY 3, 2018

EDDIE PEREZ	:	SUPERIOR COURT
PLAINTIFF,	:	
	:	
V.	:	JUDICIAL DISTRICT
	:	OF HARTFORD
CITY OF HARTFORD	:	
DEFENDANT.	:	MAY 31, 2018

COMPLAINT

1. At all times pertinent hereto, the Defendant City of Hartford (City) is a municipality in the State of Connecticut.

2. At times relevant hereto the Plaintiff Eddie Perez is a resident of the City of Hartford, the Mayor of the City of Hartford, and the former Mayor of the City of Hartford.

3. At all times relevant hereto the Plaintiff Eddie Perez, as an employee of the City of Hartford, was entitled to a pension from the City as long as he was not convicted of a felony associated as his duty as mayor.

4. On or about 2008 the State of Connecticut convened a one person grand jury to investigate corruption in the City of Hartford.

5. The grand jury issued two reports, on accusing the Plaintiff of bribe receiving and the other, the crime of extortion.

6. The Plaintiff was arrested on these charges January 27, 2009 and September 2, 2009.

7. Prior to the grand jury findings and subsequent thereto, the Plaintiff was represented by the law firm of Santos & Seeley, P.C. and its successor, the Law Offices of Hubert J. Santos, P.C., in connection of criminal charges and

preservation of his pension.

8. The trial court (Dewey, J.) consolidated all charges pursuant to the State's request.

9. A trial was held on the charges from May 12, 2010 through June 18, 2010 and the Plaintiff was found guilty and sentenced by the court.

10. The Plaintiff appealed his conviction to the Appellate Court.

11. The Plaintiff's conviction was reversed by the Appellate Court.

12. The State appealed to the Connecticut Supreme Court which held on July 14, 2017 that the Plaintiff received an unconstitutional trial, and affirmed the ruling of the Appellate Court and ordered a new trial.

13. The Plaintiff thereafter moved to dismiss the charges in the trial court based upon principles of double jeopardy.

14. The double jeopardy claim was rejected by the trial court, the Appellate Court and the Connecticut Supreme Court.

15. Thereafter, On August 31, 2017 the Plaintiff entered guilty pleas to the charges and was given a suspended sentence.

16. The prosecution of the Plaintiff placed him in jeopardy of losing his right to a pension from the City of Hartford, and is entitled to reimbursement of his legal fees for this reason alone.

17. Prior to and during Plaintiff's trial, the City of Hartford paid legal fees for numerous witnesses subpoenaed or called by the prosecution to Plaintiff's trial.

18. Since the Plaintiff was presumed innocent, he too was entitled to

payment of his legal fees.

19. The Plaintiff has requested payment of his legal fees for the period from 2008 until his sentencing on August 31, 2017.

20. The Defendant wrote to Plaintiff on January 23, 2018 and requested payment of his legal fees; and on various occasions prior thereto made demand for payment of his legal fees to the Corporation Counsel of the City of Hartford.

21. On February 13, 2018 his request for counsel fees was denied.

22. The Plaintiff is entitled to reimbursement of his legal fees pursuant to Connecticut General Statutes Sec. 7-101a(a)(b) in that his conduct that led to his conviction was malicious, wanton or willful act or ultra vires act resulting in a judgment while acting in the discharge of his duties as mayor, and for the reasons stated at paragraphs 15, 16 and 17.

23. The City is required to pay such fees because the defense of the criminal charges involves both criminal and civil penalties.

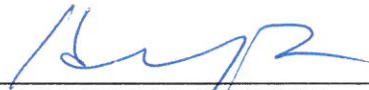
24. The City is further obligated to pay Plaintiff's legal fees because it had engaged in a course of conduct of paying legal fees to employees of the City who were to be scheduled to be called as witnesses to the Plaintiff's trial, and like the Plaintiff were presumed innocent.

25. As Mayor of the Defendant City of Hartford, during the period 2008 to June 25, 2010, the Defendant approved of such payment of his legal fees.

26. The total amount owed to the Plaintiff by the Defendant City is in excess of \$1,000,000.

**RESPECTFULLY SUBMITTED,
THE PLAINTIFF, EDDIE PEREZ**

BY



HUBERT J. SANTOS
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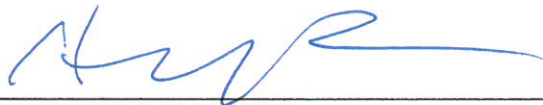
DEMAND FOR RELIEF

The Plaintiff demands:

1. Money damages in excess of \$15,000.00.

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