

DAVID COE  
 Name  
1200 PRISON RD. LCC  
LOVELOCK, NV. 89419  
20189  
 Prison Number

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

DAVID COE )  
 Plaintiff, )  
 vs. )  
Connie Bisbee et al )  
SUSAN JACKSON )  
MICHAEL REETER )  
ED GRAY )  
ADAM ENDEL )  
STATE OF NEVADA EXR )  
 Defendant(s). )

CASE NO. \_\_\_\_\_  
 (To be supplied by the Clerk)

**CIVIL RIGHTS COMPLAINT  
 PURSUANT TO  
 42 U.S.C. § 1983**

**A. JURISDICTION**

1) This complaint alleges that the civil rights of Plaintiff, DAVID COE  
 (Print Plaintiff's name)  
 who presently resides at 1200 PRISON RD. LOVELOCK, NV. 89419, were  
 violated by the actions of the below named individuals which were directed against  
 Plaintiff at High Desert State Prison on the following dates  
 (Institution/city where violation occurred)  
8/20/14 + 9/24/14, 8/20/14 + 11/9/14, and N/A  
 (Count I) 12/7/14 3/11/15 (Count II) (Count III)

CC LL FORM 36.022

Make a copy of this page to provide the below information if you are naming more than five (5) defendants

2) Defendant Connie Bisbee resides at 1677 Old Hot Springs RD # A-104 Carson City  
(full name of first defendant) (address if first defendant) Nevada 89703  
and is employed as Parole Commissioner / Chairman. This defendant is sued in his/her  
(defendant's position and title, if any)  
 individual  official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Connie Bisbee was/is the Parole Commissioner / Chairman at my hearing who retaliated & violated my due process

3) Defendant Susan Jackson resides at 1677 Old Hot Springs RD # A-104 Carson City  
(full name of first defendant) (address if first defendant) Nevada 89703  
and is employed as Parole Commissioner. This defendant is sued in his/her  
(defendant's position and title, if any)  
 individual  official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Ms. Jackson was/is a Parole Commissioner on my hearing who violated my due process & retaliated

4) Defendant Michael Keller resides at 1677 Old Hot Springs RD # A-104 Carson City  
(full name of first defendant) (address if first defendant) Nevada 89703  
and is employed as Parole Commissioner. This defendant is sued in his/her  
(defendant's position and title, if any)  
 individual  official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Mr. Keller was/is a Parole Commissioner at my hearing who retaliated & violated my due process.

5) Defendant Ed Gray resides at 1677 Old Hot Springs RD # A-104 Carson City  
(full name of first defendant) (address if first defendant) Nevada 89703  
and is employed as Parole Commissioner. This defendant is sued in his/her  
(defendant's position and title, if any)  
 individual  official capacity. (Check one or both). Explain how this defendant was acting

under color of law: Mr. Gray was/is a Parole Commissioner on my hearing who retaliated & violated my due process rights.

6) Defendant Adm Endel resides at 1677 Old Hot Springs Rd, #4-104 Carson City  
(full name of first defendant) (address if first defendant) nv. 89703  
and is employed as Prde Commissioner. This defendant is sued in his/her  
(defendant's position and title, if any)  
 individual  official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: MR. ENDEL Followed the other Commissioners  
Restrictes, violated my Due Process and Didnt allow me a defence to wrong  
Information.

7) Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional statutes, list them below.

\_\_\_\_\_

\_\_\_\_\_

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**B. NATURE OF THE CASE**

1) Briefly state the background of your case.

After a one year revocation hearing that put plaintiff back in prison  
he went to a Parole Board Hearing. At this Hearing the Plaintiff's Due Process  
Rights were violated by the Defendants shown on Order of denial.  
Plaintiff was given a 3 year denial and when he received the  
denial notice found that there was inaccurate information  
used by defendants in reaching their decision which he  
wasnt informed of at Parole Hearing or allowed to  
defend. Plaintiff notified Defendants of errors, appeal-  
ing decision only to be denied again and have errors  
restated as being true. Plaintiff sent prison response  
in formal grievance and appeals and requests to fix  
errors with no response from Defendants.

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**C. CAUSE OF ACTION**

COUNT I

The following civil rights has been violated: My rights to Due Process  
1<sup>st</sup>, 6<sup>th</sup>, 9<sup>th</sup>, 10<sup>th</sup>, AND/OR 14<sup>th</sup>

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

8/20/14 During A Parole Hearing Parole Board Commissioners ED Gray,  
Connie Bisbee (Chairman) & Michael Keeler denied Parole  
using erroneous information that:

- 1) No one knew about,
- 2) Did not appraise the plaintiff,
- 3) Did not allow Plaintiff to defend,
- 4) that was in on the  
parole report that he signed,
- 5) that was erroneous /  
wrong - "Not Him",
- 6) that allowed Defendants to use  
retaliation,

When Plaintiff received Denial of Parole he saw errors  
and immediately tried to appeal and show Defendants  
their error. He contacted the FBI and prison grievance  
proceeding and sent proof he was in prison before as they  
assert. Appeal to Board: 9/24/14, 11/1/14, 12/7/14 & 3/11/15,

The denial of Parole was upheld and ratified by  
Commissioners: ED Gray, Michael Keeler, Connie  
Bisbee (Chairman) and Susan Jackson. and  
signed by Adam Endel, on 8/20/14

Retaliation was on a technicality and Plaintiff had no new charges,  
and wouldnt have been left in prison but for Defendants violation.

## COUNT II

The following civil rights has been violated: the 1<sup>st</sup> amendment Right  
to be free from Retaliation

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

At a parole hearing on 8/20/14, Defendants: ED Gray,  
Connie Bisbee, Michael Keeler retaliated against Plaintiff, causing  
him harm and prejudice and gave him a 3 year parole denial.  
This decision was upheld by commissioners: Michael Keeler,  
Ed Gray, Connie Bisbee and Susan Jackson and Signed by Adam  
Entel. This decision was made using wrong/made up crimes  
and convictions and should've been based on accurate info.  
The 3 year denial wouldn't have happened if Defendants did  
not retaliate against him using wrong information. Plaintiff  
wasn't allowed to defend against or confront this info.

Plaintiff informed Parole Commissioners, in letter for Reconsideration  
on 9/24/14, of errors and was told he was in prison in 1979  
by Commissioner ED Gray in letter of 10/13/14. Continued  
appeals and letters with proof of errors were not answered.

On 3/2/15 a grievance report clearly says no prior prison term  
is in Plaintiff's PSI. Plaintiff also requested origin of said  
prior prison claim and wasn't answered. Letter 12/7/14

Despite Plaintiff's continued attempts to clarify and correct  
wrong facts being used against him he's been ignored.



outline).

- a) Defendants: \_\_\_\_\_ *N/A*
- b) Name of court and docket number: \_\_\_\_\_
- c) Disposition (for example, was the case dismissed, appealed or is it still pending?):  
\_\_\_\_\_
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 2) Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted? \_\_\_ Yes  No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim: *N/A*

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim: *N/A*

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_

- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim: *N/A*

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures?  Yes \_\_\_ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) \_\_\_ disciplinary hearing; (2) \_\_\_ state or federal court decision; (3) \_\_\_ state or federal law or regulation; (4) \_\_\_ parole board decision; or (5) \_\_\_ other \_\_\_\_\_

If your answer is "Yes", provide the following information. Grievance Number *See \**  
Date and Institution where grievance was filed *2/28/15 HOSP.*  
*\* 20062994387*

Response to grievance: *Response - Just Denied - 2/5/15 - Inaccurate Information wasn't provided to Parole Board by Prison Parole Board Report and PSI does not reflect prior prison term.*




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**E. REQUEST FOR RELIEF**

I believe that I am entitled to the following relief:

- ① Immediate Release - Continue on Parole
- ② Erroneous Information Deleted from Parole Commissioner's Files
- ③ An Excess of \$1,000,000<sup>00</sup> (one million dollars)
- ④ Any other Relief that the Court Deems proper to Add to the Above.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

\_\_\_\_\_  
(Name of Person who prepared or helped prepare this complaint if not Plaintiff)

  
(Signature of Plaintiff)  
DAVID COE  
20184

9/18/16  
(Date)

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(Additional space if needed; identify what is being continued)