

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

Brian P. Carr
Plaintiff

versus

The State of Oregon through Hardy Myers in
his official capacity as Attorney General of the
State of Oregon and the City of Portland
through Linda Meng in her official capacity as
City Attorney of the City of Portland
Defendants

Civil No. _____

COMPLAINT

1 The Plaintiff, Brian P. Carr, appearing pro se in this matter, as and for his complaint allege the
2 following:

3 Introduction

4 1. Mr. Carr's rights to liberty and property were deprived without due process and Mr. Carr was
5 not provided equal protection under the law as required by the [Fourteenth Amendment](#) of the
6 U.S. Constitution as a result of the actions of the State of Oregon and its official officers. Mr.
7 Carr is seeking declaratory relief as well as damages.

9 2. Mr. Carr was arrested by the Portland Police Bureau on November 5, 2004 without probable
10 cause of any violation and incarcerated for over three days. No charges were ever filed against
11 Mr. Carr. The State of Oregon has continued to publish the record of Mr. Carr's arrest for
12 consideration in employment decisions because he was not arrested for any crime. Had he
13 been arrested for some crime, he could have had the record sealed under [ORS 137.225](#) and
14 restored his otherwise blemish free criminal record.