

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

Jala Johnson

Plaintiff(s)

v.

City of West Allis, Morgan Youngquist, Andrew Lamm, and
UNKNOWN OFFICERS.

Defendant(s)

Civil Action No. 25-cv-1447-BHL

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

City of West Allis
7525 W. Greenfield Ave.
West Allis, WI 53214

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) – or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or the plaintiff's attorney, whose name and address are:

Latiera Scott-Johnson, Scott-Johnson & Smith LLP
LaSheda Brooks, Intentional Legacy Law Office
6127 S University Ave., Unit 1261, Chicago, IL 60637
latierasj@sjsllp.com; info@intentionallegacylawoffice.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

LINDA M. KLEMM, CLERK OF COURT

Date: 9/24/2025

s/ Alex Vahlsing

Signature of Clerk or Deputy Clerk

Civil Action No. 25-cv-1447-BHL

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4(l))*This summons and the attached complaint for *(name of individual and title, if any)*:were received by me on *(date)* _____.☐ I personally served the summons and the attached complaint on the individual at *(place)*:_____ on *(date)* _____; or☐ I left the summons and the attached complaint at the individual's residence or usual place of abode with *(name)*

_____, a person of suitable age and discretion who resides there,

on *(date)* _____, and mailed a copy to the individual's last known address; or☐ I served the summons and the attached complaint on *(name of individual)* _____who is designated by law to accept service of process on behalf of *(name of organization)* __________ on *(date)* _____; or☐ I returned the summons unexecuted because _____; or☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0

I declare under penalty of perjury that this information is true.

Date: _____

*Server's signature*_____
*Printed name and title*_____
Server's address

Additional information regarding attempted service, etc.:

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

Jala Johnson,

Plaintiff,

CASE NO. ____

v.

JURY TRIAL DEMANDED

**City of West Allis, West Allis Police
Officers Morgan Youngquist,
Andrew Lamm, and UNKNOWN
OFFICERS,**

Defendants.

COMPLAINT

Plaintiff Jala Johnson, (“Ms. Johnson”), by and through her undersigned counsel, complains that the CITY OF WEST ALLIS and WEST ALLIS POLICE OFFICERS MORGAN YOUNGQUIST, ANDREW LAMM, and UNKNOWN OFFICERS were acting under the color of law when they, together and separately, violated her constitutional and civil rights under federal laws by using excessive force against her and unlawfully seizing her on August 20, 2024. Ms. Johnson files this suit seeking justice for the unlawful deprivation of rights she suffered at the hands of the Officer Defendants and the City of West Allis. In support of her claims, Ms. Johnson hereby states and alleges as follows:

JURISDICTION AND VENUE

1. This action is brought pursuant to the Civil Rights Act, 42 U.S.C. § 1983, and the Fourth and Fourteenth Amendments to the United States Constitution.
2. The jurisdiction of this Court is invoked pursuant to the judicial code 28 U.S.C. § 1331 and 1343(a); the Constitution of the United States.

3. Venue is proper in this District under 28 U.S.C. § 1391(b). The parties reside, or, at the time the events took place, resided in this judicial district, and the events giving rise to plaintiff's claims also occurred in this judicial district.

PARTIES

4. Plaintiff Jala Johnson is a citizen of the United States of America, who, at all times relevant, resided in the State of Wisconsin.

5. Defendant Officers Morgan Youngquist, Andrew Lamm and Unknown Officers were, at the time of this occurrence, duly licensed West Allis Police Officers. They engaged in the conduct complained of in the course and scope of their employment and under the color of law. They are each sued in their individual capacities.

6. Defendant City of West Allis is a municipal corporation duly incorporated under the laws of the State of Wisconsin. It is the employer and principal of Defendant Officers.

FACTS

7. On August 20, 2024, 22-year-old Plaintiff Jala Johnson, was driving in West Allis to a local bar for food.

8. While driving, Ms. Johnson noticed a West Allis Police Department patrol car following behind her.

9. After arriving at her destination, Ms. Johnson exited her vehicle and began crossing the street to the bar.

10. As she was walking across the street, she was stopped from behind by the command of Defendant Youngquist who was still in his patrol vehicle.

11. As he exited his vehicle, Defendant Youngquist yelled for Ms. Johnson to "come here" and indicated that he was "doing a traffic stop."

12. Defendant Officer Youngquist claimed that he was stopping Ms. Johnson because the tints of her windows were too dark.

13. As Defendant Officer Youngquist exited his vehicle, he used his radio to call additional officers to the traffic stop.

14. Ms. Johnson disagreed with Defendant Youngquist's assessment that her window tints were too dark and expressed this disagreement to Defendant Youngquist multiple times.

15. Ms. Johnson expressed to Defendant Youngquist that she believed she was only being stopped by Defendant because of his belief that she was a Black male in the car.

16. Ms. Johnson continued to express her disagreement with Defendant Youngquist throughout their interaction, all of which is captured on body worn camera.

17. At one point, Defendant Youngquist directed Ms. Johnson to stand in front of his patrol car.

18. While complying with Defendant Youngquist's request and moving towards Defendant Youngquist's patrol car as directed, Ms. Johnson questioned Defendant Youngquist repeatedly asking "why" and "what for?".

19. Defendant Youngquist responded that he was "writing her a ticket."

20. Ms. Johnson again asked "why?".

21. In response, and without any lawful basis, Defendant Youngquist can be seen on body worn camera violently escalating the encounter by grabbing Ms. Johnson's head, hair and arm and forcefully slamming her to the concrete pavement.

22. Body camera footage of the incident shows Defendant Youngquist forcibly twisting Ms. Johnson's arms behind her back and handcuffing her while forcing his knee and fist into the back of Ms. Johnson's head, the side of her face and her back.

23. Ms. Johnson, afraid and already in pain, began screaming and crying that she couldn't breathe and that she had not done anything.

24. While on the ground, Defendant Youngquist rotated between using his knee and open-handed fist to forcefully slam Ms. Johnson's head to the ground.

25. Additional patrol units arrived at the scene while Ms. Johnson lied helpless under Defendant Youngquist's knee and full body weight.

26. While Ms. Johnson lied on the pavement crying for help, Defendant Officer Lamm joined Defendant Youngquist in the attack and placed his knee and body weight on Ms. Johnson's back as well.

27. Ms. Johnson continued to lie helpless, crying and screaming for help, now with two officers pressing their knees and full body weight into her neck and back.

28. Defendant Youngquist attempted to lift Ms. Johnson to her feet but initially was not able to because Defendant Lamm's knee remained pressed into Ms. Johnson's back.

29. Defendant Officers then forced Ms. Johnson to her feet and up against a patrol car as she continued to cry and scream that she thought the officers were going to "break [her] arms" due to the pain of the handcuffs.

30. Defendant Youngquist then began to search and remove Ms. Johnson's purse.

31. During Defendant Youngquist's attack, he had handcuffed Ms. Johnson's purse to her wrist.

32. Defendants then proceeded to forcefully slam Ms. Johnson to the concrete pavement again to remove the purse.

33. Defendants then searched Ms. Johnson's car.

34. Ms. Johnson was again subjected to two officers pressing their knees and full body weight into her neck and back and by this time a third, Unknown Defendant Officer joined and began pulling at her arm.

35. There was another brief verbal exchange between Ms. Johnson and the Officers.

36. Despite weighing only 110 pounds and offering no physical resistance, Ms. Johnson was forced to the ground again and again and pinned face-down on the concrete by the combined weight of multiple West Allis Police Officers.

37. While on the ground, Ms. Johnson cried that she had asthma and could not breathe to which Defendant Officers responded, "shut up."

38. Defendant Officers again forced their knees into Ms. Johnson's back and again slammed her head against the pavement.

39. Ms. Johnson was finally placed in a patrol car and taken to the police station.

40. Ms. Johnson was booked, detained before being issued only municipal citations for window tint and resisting an officer.

41. Ms. Johnson was not charged with any criminal offense.

42. Ms. Johnson left this horrific incident badly bruised on her face, stomach, back and wrists.

43. Ms. Johnson was unarmed and posed no threat to officers.

44. Ms. Johnson was complying with Defendant Youngquist's directions when he attacked her.

45. The consistent force used against Ms. Johnson was objectively unreasonable.

46. To this day, Ms. Johnson still suffers from the traumatic effects of Defendant Officers' horrendous misconduct.

47. Defendant Unknown Officers were present and saw the unreasonable search, seizure, and use of force against Ms. Johnson. Although they had an opportunity to prevent and intervene in the unconstitutional conduct, they did not.

48. The acts of Defendant Officers were intentional, willful, and wanton.

49. As a direct and proximate result of the unlawful actions of the defendants, Ms. Johnson was injured, including physical injuries, pain and suffering, humiliation, embarrassment, fear, emotional trauma, mental anguish, the deprivation of her constitutional rights and dignity, interference with a normal life, lost time, and attorneys' fees.

COUNT I: 42 U.S.C. § 1983 – Excessive Force
(Against Defendant Officers)

50. Plaintiff realleges each of the foregoing paragraphs as if fully set forth here.

51. The actions of the Defendant Officers constituted unreasonable, unjustifiable, and excessive force against Plaintiff, thus violating her rights under the Fourth Amendment to the Constitution of the United States and 42 U.S.C. §1983.

52. As a direct and proximate result of the above-detailed actions of the defendants, Plaintiff was injured, including severe pain, physical injury, mental suffering, anguish and humiliation, emotional distress, and fear.

53. WHEREFORE the Plaintiff, Jala Johnson, pursuant to 42 U.S.C. §1983, demands judgment against Defendant Officers for compensatory damages, punitive damages, the costs of this action and attorneys' fees, and any such other and further relief as this Court deems equitable and just.

COUNT II: 42 U.S.C. § 1983, First Amendment Retaliation
(Against Defendant Officers)

54. Plaintiff realleges each of the foregoing paragraphs as if fully set forth here.

55. Plaintiff exercised her First Amendment rights.

56. Plaintiff's exercise of her First Amendment rights is a constitutionally protected activity. Individual speech regarding matters of public policy, public safety, and police misconduct, are examples of such protected activity.

57. On August 20, 2024, Ms. Johnson had a constitutional right under the First Amendment to question the Defendant Officer's about their motives for her detention and express her disagreement with the Defendant Officer's actions.

58. On August 20, 2024, Defendant Officers responded to Ms. Johnson's protected speech by attacking Ms. Johnson to silence and punish her for exercising her constitutional right.

59. Defendant Officers, together, violated Ms. Johnson's First Amendment rights. Any reasonable law enforcement officer would have known that this conduct would violate Ms. Johnson's constitutional rights.

60. As a direct and proximate result of the malicious actions of Defendant Officers, Plaintiff was injured, including, but not limited to, embarrassment, humiliation, the deprivation of her constitutional rights and dignity, damage to her reputation, interference with her normal life, severe emotional distress, and pain and suffering.

WHEREFORE the Plaintiff, Jala Johnson, pursuant to 42 U.S.C. §1983, demands judgment against Defendant Officers for compensatory damages, punitive damages, the costs of this action and attorneys' fees, and any such other and further relief as this Court deems equitable and just.

COUNT III: 42 U.S.C. § 1983, Illegal Search and Seizure
(Against Defendant Officers)

61. Plaintiff realleges each of the foregoing paragraphs as if fully set forth here.

62. The search and seizure of Plaintiff's person and her car performed willfully and wantonly by Defendant Officers, as detailed above, were in violation of Plaintiff's right to be

free from unreasonable searches and seizures under the Fourth Amendment to the Constitution of the United States and 42 U.S.C. § 1983.

63. As a direct and proximate result of the above-detailed actions of the Defendant Officers, Plaintiff was injured, including the deprivation of her liberty and the taking of her person. In addition, the violations proximately caused Plaintiff to suffer, without limitation, pain, suffering, humiliation, emotional distress, mental anguish, exposed her to public scandal and disgrace, and financial loss.

WHEREFORE the Plaintiff, Jala Johnson, pursuant to 42 U.S.C. §1983, demands judgment against Defendant Officers for compensatory damages, punitive damages, the costs of this action and attorneys' fees, and any such other and further relief as this Court deems equitable and just.

COUNT IV: 42 U.S.C. § 1983, Unlawful Arrest
(Against Defendant Officers)

64. Plaintiff realleges each of the foregoing paragraphs as if fully set forth here.

65. The actions of Defendant Officers, described above, knowingly caused Plaintiff to be arrested and imprisoned without probable cause or any other justification, constituted a deliberate indifference to Plaintiff's right under U.S. Constitution in violation of the Fourth and Fourteenth Amendment.

66. As a proximate result of the above-detailed actions, Plaintiff was injured, including the deprivation of her liberty and the taking of her person. In addition, the violations proximately caused Plaintiff mental anguish, embarrassment, and humiliation, exposed her to public scandal and disgrace, and caused him to incur various expenses, including but not limited to attorneys' fees, all to Plaintiff's damage.

WHEREFORE the Plaintiff, Jala Johnson, purusant to 42 U.S.C. §1983, demands judgment against Defendant Officers for compensatory damages, punitive damages, the costs of this action and attorneys' fees, and any such other and further relief as this Court deems equitable and just.

COUNT V: 42 U.S.C. § 1983, Failure to Intervene
(Against Unknown Defendant Officers)

67. Plaintiff realleges each of the foregoing paragraphs as if fully set forth here.

68. The actions of Defendant Officers Youngquist and Lamm constituted unreasonable, unjustifiable and unlawful use of excessive force against Plaintiff and an illegal search and seizure thus violating Plaintiff's rights under the Fourth Amendment to the United States Constitution and to 42 U.S.C. §1983.

69. Defendant Unknown Officers failed to intervene when Defendants Youngquist and Lamm used unreasonable force against Plaintiff and illegally searched and seized her, as alleged above, even though there was no legal basis for it.

70. The aforementioned actions of the Defendants were the direct and proximate cause of the Constitutional violations set forth above.

71. As a proximate result of the above-detailed actions, Plaintiff was injured, including the deprivation of her liberty and the taking of her person. In addition, the violations proximately caused Plaintiff mental anguish, embarrassment, and humiliation, exposed her to public scandal and disgrace, and caused her to incur various expenses, including but not limited to attorneys' fees, all to Plaintiff's damage.

WHEREFORE the Plaintiff, Jala Johnson, purusant to 42 U.S.C. §1983, demands judgment against Defendant Officers for compensatory damages, punitive damages, the costs of

this action and attorneys' fees, and any such other and further relief as this Court deems equitable and just.

COUNT VI: 42 U.S.C. § 1983, *Monell*
(Against City of West Allis)

72. Plaintiff realleges each of the foregoing paragraphs as if fully set forth here.

73. The constitutional violations detailed above were caused by the customs, policies, and practices of the defendants, as promulgated, enforced, and disseminated by the Village of West Allis, the Mayor of West Allis, the West Allis Board, members of the West Allis Board, the West Allis Police Department, and members of the West Allis Police Department, whereby those charged with ensuring compliance with the Constitution of the United States, in this case and many other cases, instead deliberately, willfully, and wantonly encourage the infliction of physical and psychological injuries onto the citizens of West Allis.

74. The customs, policies, and practices that caused the constitutional violations herein include:

- a. A code of silence whereby officers refuse to report the unconstitutional and criminal misconduct of other officers, including the unconstitutional and criminal conduct alleged in this Complaint; whereby officer remain silent or give false and misleading information during official investigations to cover up unconstitutional and criminal misconduct; and whereby officers maintain loyalty to each other over the constitutional rights of citizens;
- b. The willful, wanton, and deliberately indifferent failure to train, supervise, and discipline police officers in regard to unconstitutional and criminal misconduct;
- c. Failure to adequately investigate and substantiate allegations of unconstitutional and criminal misconduct by police officers; and
- d. The failure to adequately discipline police officers that engage in unconstitutional and criminal misconduct.

75. The policies, practices, and customs herein complained of are so prevalent and widespread within the West Allis Police Department as to put the Village of West Allis policymakers on actual and implied notice that such policies exist in full force and effect.

76. West Allis policymakers acted willfully, wantonly, and with deliberate indifference toward the constitutional rights of Plaintiff by accepting, monitoring, maintaining, protecting, and encouraging the unconstitutional policies, practices, and customs listed in this Complaint.

77. By acting willfully, wantonly, and deliberately indifferent towards the constitutional rights of Plaintiff, West Allis policymakers approved, encouraged, and caused the constitutional violations alleged in this Complaint.

78. As a proximate result of the above-detailed actions of the Defendants and West Allis policymakers, Plaintiff was injured, including injuries resulting from the above-detailed constitutional violations, pain, suffering, anguish, embarrassment, emotional injuries, psychological injuries, physical injuries, and permanent injuries. In addition, the violations proximately caused Plaintiff great humiliation, exposed her to public scandal and disgrace, and caused her to incur various expenses, all to her damage.

WHEREFORE the Plaintiff, Jala Johnson, pursuant to 42 U.S.C. §1983, demands judgment against Defendant Officers for compensatory damages, punitive damages, the costs of this action and attorneys' fees, and any such other and further relief as this Court deems equitable and just.

Dated: September 18, 2025

By: /s/ Latiera Scott-Johnson
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