

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

TROY REED,

Plaintiff,

v.

TARGET CORPORATION, a
Minnesota For-Profit Business
Corporation; **CITY OF PITTSBURGH,**
a Pennsylvania Municipal Corporation;
KEITH EDMONDS, in his individual
and official capacities,

Defendants.

Case No. 2:23-cv-896

**COMPLAINT IN CIVIL ACTION
FOR DAMAGES, EQUITABLE,
AND DECLARATORY RELIEF**

**Fed.R.Civ.P. 38(b)(1) Notice of
Demand for Trial by Jury**

COMPLAINT

NOW COMES Plaintiff Troy Reed (“REED”), and files this lawsuit in compliance with Federal Rule of Civil Procedure 9(c) against Target Corporation (“TARGET”), The City of Pittsburgh (“PITTSBURGH”), and Keith Edmonds (“EDMONDS”), for Damages and Declaratory relief as follows:

Jurisdiction and Venue

1. REED brings this lawsuit to redress violations of the Fourth Amendment to the United States Constitution, as well as Pennsylvania law. Thereby, this Court has both federal question and supplemental jurisdiction.

2. The events complained of herein occurred in Allegheny County, Pennsylvania. Therefore, venue properly lies within this District and division.

Facts of the Case

3. On the evening of June 20, 2021, REED was in East Liberty Pennsylvania at a TARGET department store.

4. At or around the same time, EDMONDS was at the same location, working a security detail on behalf of PITTSBURGH and TARGET.

5. An employee of TARGET reported his belief to EDMONDS that REED had stolen some merchandise.

6. EDMONDS ran after REED.

7. REED did not make any furtive movements (e.g., putting his hands near his pocket and/or turning back towards EDMONDS in a threatening manner) yet nonetheless, EDMONDS shot REED in the back with a taser, causing injury and damages.

8. EDMONDS knew that his use of his taser was excessive since REED was not fleeing from a serious crime or otherwise a danger or potential danger to any other person.

9. EDMONDS said to REED, “if we weren’t on camera, I would have killed you.”

10. These causes of action follow:

COUNT I
42 U.S.C. § 1983- Excessive Force
Against EDMONDS

11. All other paragraphs of this lawsuit are incorporated.

12. EDMONDS was investigating a very minor crime, Summary Retail Theft.

13. REED was not armed, nor actively resisting arrest. He was running away and never tried to strike or otherwise harm EDMONDS, himself, or anyone else.

14. Despite these facts, EDMONDS intentionally used force against REED and injured him by causing electricity to enter REED's body, causing REED to fall to the ground.

15. EDMONDS use of force was in contravention to PITTSBURGH policy, which only permitted EDMONDS to use his taser if REED was actively resisting, aggressively non-compliant, violent, or potentially violent. REED did not fall into any of those categories.

16. EDMONDS' actions were taken under the color of state law, and within the scope of his employment with PITTSBURGH and/or TARGET.

17. As a direct and proximate result of EDMONDS' actions as described in this Count, REED's civil rights under the Fourth and Fourteenth Amendments were violated, causing him injury and damages.

COUNT II
Common law Battery
Against All Defendants

18. All other paragraphs of this lawsuit are incorporated.

19. TARGET and PITTSBURGH are responsible for its agents' actions taken in the scope of their agency.

20. As EDMONDS' actions are described above, it is alleged that EDMONDS offensively touched REED by way of taser.

21. EDMONDS lacked consent or any other justification for his touching of REED.

22. As a direct and proximate cause of EDMONDS' actions, REED was injured and entitled to damages.

WHEREFORE, REED respectfully requests Judgment against Defendants, jointly and severally where appropriate, for economic & non-economic compensatory damages, punitive damages, pre and post judgment interest, costs of suit, and attorney fees, as well as an ORDER DECLARING that REED's Fourth and Fourteenth Amendment rights were violated by way of excessive force, and any other relief that the Court determines is appropriate and proper.

Respectfully submitted on April 25, 2023.

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