

This complaint regarding documented violations of First Amendment rights is made in an attempt to first resolve the issue through the administrative process.

Should the right to record public incidents from public property not be resolved, further action may become necessary to prevent the Hartford Police Department from unlawfully arresting of the undersigned at future public safety incidents.

The undersigned is an experienced member of the media who has thirty plus years of experience responding to breaking news incidents for the purpose of gathering photographs, videos and factual information for dissemination to other media news desks and the general public.

This complaint is necessary based on the fact that several recorded threats of arrest were made directly to the undersigned under color of law by as yet to be identified members of the Hartford Police Department.

Citizen Complaint

Complainant's Name: **Edward A. Peruta** Date of Birth: **January 21, 1949**

Address: **38 Parish Road**

City: **Rocky Hill** State: **Connecticut** Zip: **06067**

Home Phone: **860-978-5455** Business Phone: **860-626-9991** Ext: **None**

Cellular Phone: **860-978-5455** E-mail Address: **edperuta@amcable.tv**

Sex: Male Female Race/Ethnicity: **Caucasian**

Did you witness the incident: Yes No

INCIDENT INFORMATION

Date of Incident: **September 12, 2014** Time of Incident: **Between 9 and 10 pm**

Location of Incident: **Park Street in the area of Hungerford Street**

Description of the Incident:

Conduct unbecoming an officer Harassment Threatening Arrest of the complainant Civil Rights Violation (1st Amendment)

The following is a narrative of the incident and is supported by raw video clips of incident

On the evening of September 12, 2014, between the hours of 9 and 10 pm, I responded from the Dunkin Doughnuts parking lot at 265 Washington Street in Hartford, (by way of Madison and Broad Street), to a shooting incident on Park Street at Hungerford Street in the City of Hartford for the purpose of recording the incident and gathering facts as a member of the media. The distance traveled was approximately one half mile.

Upon arrival in the area, I legally parked my vehicle bearing Connecticut passenger registration CTNEWS on the northbound side of Broad Street just south of Park St., secured my vehicle and firearm, and began walking north on Broad Street and then east on the south side of Park Street towards the shooting scene.

As part of my approach to the shooting scene, I purposely made it a point to identify other members of the public who were being permitted to move freely outside the area believed to be the crime scene and the location of Hartford Police officers at the scene.

Based on my thirty plus years of news gathering experience and history of past interactions with law enforcement at similar scenes, I made it a point to observe and document as much as possible prior to approaching the shooting scene on Park Street in Hartford.

For the past thirty plus years, I have kept myself aware of federal and state civil case law regarding the limits and rights of the media to access areas around scenes similar to the one on Park Street on the night of September 12, 2014.

While on the south side of Park Street in an area 585 Park which is southwest of the shooting scene, I began to record and document the shooting scene along with members of the Hartford Police Department and general public.

At no time did I cross or enter beyond any clearly established yellow crime scene perimeters.

Expecting interference with my news gathering activities from members of the Hartford Police Department, I video recorded the area and private citizens who were permitted to walk in both directions on the south side of Park Street and the fact that members of the general public were permitted to remain where they could view the crime scene and deceased shooting victim until the camera was noticed by a Hartford Police Supervisor believed to be a Sgt.

After initial contact with a HPD officer, I crossed over to the North side of Park Street to the intersection of Hungerford Street, where other non-police individuals were gathered and viewing the shooting victim and area of police activity.

It became very apparent and is documented in the video record, that a supervising member of the Hartford Police Department noticed the undersigned, pointed in my direction, and proceeded to direct and instruct other subordinate HPD officers to move people including the undersigned to areas where they would not be able to view the deceased shooting victim or the public safety activity taking place on Parks Street.

It is my belief that the order to move and repeated verbal threats of arrest were a direct attempt to limit and restrict the media in their news gathering duties while on public property outside the crime scene.

It is requested that circumstances of this incident be investigated and that ALL officers involved be disciplined and provided with mandatory instruction and written directives in First Amendment rights.

Respectfully

Edward A. Peruta
American News and Information Services Inc.
38 Parish Road
Rocky Hill, CT 06067

STATE OF CONNECTICUT
COUNTY OF HARTFORD

On this, the 13th day of September, 2014, before me, **Edward A. Peruta**, the above signed individual, personally appeared and is known to me or satisfactorily proven to be the person whose name is subscribed to this complaint and acknowledges that he/she executed the same for the purpose therein contained. In witness thereof I hereunto set my hand pursuant to Section 1-24 of the Connecticut General Statutes.

Signature _____
Attorney Rachel M. Baird
Commissioner of the Superior Court

cc: Attorney Rachel M. Baird
File