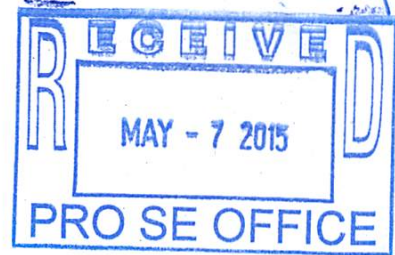


Christopher Grief #85395-053
MDC Brooklyn
P.O. Box 329002
Brooklyn, NY 11232

Plaintiff, pro se

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK



CHRISTOPHER GRIEF,
Plaintiff,

-v-

K. ASK-CARLSON, warden of
MDC Brooklyn, sued in her official
capacity,
Defendant.

Case No. _____

AMENDED

COMPLAINT

15-CV-2465 (PKC)(JO)

COMES NOW, Christopher Grief #85395-053, Plaintiff pro se, who presents the following civil-
rights complaint and claim for declaratory and injunctive relief as follows;

I: INTRODUCTION

1. This action places before the court a lawsuit involving the administration of MDC Brooklyn.
(A federal Detention facility)
2. This complaint alleges that the defendant, by thier acts and omissions, have placed a
substantial burden on the plaintiffs exercrise of religion in violation of the Religious Freedom
Restoration Act. ("RFRA")

II: PARTIES

3. CHRISTOPHER GRIEF #85395-053 ("Plaintiff") is a pre-trial inmate in the custody of the
Metropolitan Detention Center in Brookyn, NY ("MDC Brooklyn"). At all times relevant to this action,
Plaintiff was housed at MDC Brooklyn, 80 29th Street, Brooklyn, NY 11232.

4. K. ASK-CARLSON ("Defendant"), at all times relevant to this action, was and is currently
the Warden of MDC Brooklyn. She holds custody of the plaintiff. She is being sued in her official
capacity as the warden of MDC Brooklyn.

5. Defendant has designated chaplains in the institutions Religious Services department
to process requests for religious accomidation. The defendant remains the ultimate authority for
approving these requests.

III: JURISDICTION

6. This court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 and 1343(a)(4).

IV: RELIGIOUS BELIEF AND PRACTICE

7. Plaintiff engages in meditation as part of his quest to achieve spiritual enlightenment.

8. Plaintiff believes everything has a spiritual essence to it.

9. Plaintiff has a strong spiritual connection with the spiritual essence of stuffed animals.

10. In order for plaintiff to meditate on enlightenment he must do so with the presence of at least two stuffed animals.

V: STATEMENT OF FACTS

11. The plaintiff submitted a "Request to Staff" to the religious services department on December 24, 2014 requesting permission to have two stuffed animals send in to him and to keep it in his property for his religious practices.

12. On December 24, 2014 Plaintiff was told by a chaplain to complete the form BP-A0822 in order for his request to be considered.

13. On December 29, 2014 the plaintiff submitted the completed BP-A0822 form to staff.

14. In the last week of January 2015 the plaintiff asked the chaplain to provide confirmation of receipt and inform him if any further action was required by him. He never recieved a response to this.

15. On February 9, 2015 the plaintiff submitted the same request, formally, to the defendant. He never recieved a response to this request.

16. Both receipt and possession of stuffed animals in the institution would require specific written approval by the defendant.

VI: CAUSE OF ACTION

17. Defendants have not approved for the plaintiff to receive and possess two stuffed animals.

18. Plaintiff requires the use of stuffed animals to practice his religion.

19. Disapproval of the plaintiffs request to receive and possess two stuffed animals by the defendant places a substantial burden on his exercise of religion in violation of the RFRA and does

not further any compelling government interest.

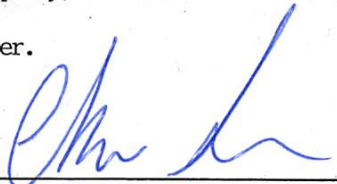
VII: RELIEF REQUESTED

WHEREFORE, Plaintiff requests that this court grant the following relief:

20. Declaratory relief, declaring that the act and omissions of the defendant have violated Plaintiff's rights, and stating the defendant's duties with respect to those rights;

21. Injunctive relief, commanding the defendant to (1) allow Plaintiff to purchase two stuffed animals to be received at the institution by a source and means to be negotiated, (2) allow Plaintiff to possess, in his property, those two stuffed animals, and to (3) provide Plaintiff with a property sheet for them that indicates he is allowed to have them in his property;

22. Any other relief that this court may deem just and proper.
Respectfully Submitted this 8th day of April, 2015.

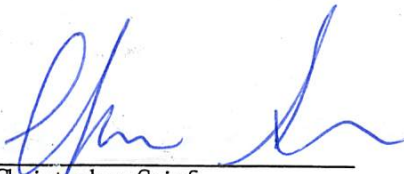


Christopher Grief
#85395-053

VIII: VERIFICATION

Pursuant to 28 U.S.C. § 1746, I, Christopher Grief, declare and verify, under penalty of perjury under the laws of the United States Of America, that I have read the foregoing and that it is true and correct to the best of my knowledge.

Dated this 8th Day of April, 2015.



Christopher Grief
#85395-053