

1 Darryl C. Carter
2 690 Albany Avenue, Apt. 2K
3 Brooklyn, NY 11203
4 Phone:
5 Email:
6 *Attorney Pro Se for the Plaintiff*



8 **UNITED STATES DISTRICT COURT**
9 **FOR THE EASTERN DISTRICT OF NEW YORK**

11 Darryl Chadwich Carter,

25-cv-02095-LDH-MMH

12 Case No.:

13 Plaintiff,

14 vs.

15 Camba Housing Ventures, Inc.;
16 Shinda Management Corporation;
17 Camba, Inc., DOES 1-10;

18 Defendants,

19 Complaint for Equitable Relief and
20 Damages

21 1.) Declaratory Relief per 28 U.S.C.
22 § 2201;
23 2.) Injunctive Relief
24 2) Nuisance

25 **JURY TRIAL DEMANDED**

26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
5510
5511
5512
5513
5514
5515
5516
5517
5518
5519
5520
5521
5522
5523
5524
5525
5526
5527
5528
5529
5530
5531
5532
5533
5534
5535
5536
5537
5538
5539
55310
55311
55312
55313
55314
55315
55316
55317
55318
55319
55320
55321
55322
55323
55324
55325
55326
55327
55328
55329
55330
55331
55332
55333
55334
55335
55336
55337
55338
55339
55340
55341
55342
55343
55344
55345
55346
55347
55348
55349
55350
55351
55352
55353
55354
55355
55356
55357
55358
55359
55360
55361
55362
55363
55364
55365
55366
55367
55368
55369
55370
55371
55372
55373
55374
55375
55376
55377
55378
55379
55380
55381
55382
55383
55384
55385
55386
55387
55388
55389
55390
55391
55392
55393
55394
55395
55396
55397
55398
55399
553100
553101
553102
553103
553104
553105
553106
553107
553108
553109
553110
553111
553112
553113
553114
553115
553116
553117
553118
553119
553120
553121
553122
553123
553124
553125
553126
553127
553128
553129
553130
553131
553132
553133
553134
553135
553136
553137
553138
553139
553140
553141
553142
553143
553144
553145
553146
553147
553148
553149
553150
553151
553152
553153
553154
553155
553156
553157
553158
553159
553160
553161
553162
553163
553164
553165
553166
553167
553168
553169
553170
553171
553172
553173
553174
553175
553176
553177
553178
553179
553180
553181
553182
553183
553184
553185
553186
553187
553188
553189
553190
553191
553192
553193
553194
553195
553196
553197
553198
553199
553200
553201
553202
553203
553204
553205
553206
553207
553208
553209
553210
553211
553212
553213
553214
553215
553216
553217
553218
553219
553220
553221
553222
553223
553224
553225
553226
553227
553228
553229
553230
553231
553232
553233
553234
553235
553236
553237
553238
553239
553240
553241
553242
553243
553244
553245
553246
553247
553248
553249
553250
553251
553252
553253
553254
553255
553256
553257
553258
553259
553260
553261
553262
553263
553264
553265
553266
553267
553268
553269
553270
553271
553272
553273
553274
553275
553276
553277
553278
553279
553280
553281
553282
553283
553284
553285
553286
553287
553288
553289
553290
553291
553292
553293
553294
553295
553296
553297
553298
553299
553300
553301
553302
553303
553304
553305
553306
553307
553308
553309
553310
553311
553312
553313
553314
553315
553316
553317
553318
553319
553320
553321
553322
553323
553324
553325
553326
553327
553328
553329
553330
553331
553332
553333
553334
553335
553336
553337
553338
553339
553340
553341
553342
553343
553344
553345
553346
553347
553348
553349
553350
553351
553352
553353
553354
553355
553356
553357
553358
553359
553360
553361
553362
553363
553364
553365
553366
553367
553368
553369
553370
553371
553372
553373
553374
553375
553376
553377
553378
553379
553380
553381
553382
553383
553384
553385
553386
553387
553388
553389
553390
553391
553392
553393
553394
553395
553396
553397
553398
553399
553400
553401
553402
553403
553404
553405
553406
553407
553408
553409
553410
553411
553412
553413
553414
553415
553416
553417
553418
553419
553420
553421
553422
553423
553424
553425
553426
553427
553428
553429
553430
553431
553432
553433
553434
553435
553436
553437
553438
553439
553440
553441
553442
553443
553444
553445
553446
553447
553448
553449
553450
553451
553452
553453
553454
553455
553456
553457
553458
553459
553460
553461
553462
553463
553464
553465
553466
553467
553468
553469
553470
553471
553472
553473
553474
553475
553476
553477
553478
553479
553480
553481
553482
553483
553484
553485
553486
553487
553488
553489
553490
553491
553492
553493
553494
553495
553496
553497
553498
553499
553500
553501
553502
553503
553504
553505
553506
553507
553508
553509
553510
553511
553512
553513
553514
553515
553516
553517
553518
553519
553520
553521
553522
553523
553524
553525
553526
553527
553528
553529
553530
553531
553532
553533
553534
553535
553536
553537
553538
553539
553540
553541
553542
553543
553544
553545
553546
553547
553548
553549
553550
553551
553552
553553
553554
553555
553556
553557
553558
553559
553560
553561
553562
553563
553564
553565
553566
553567
553568
553569
553570
553571
553572
553573
553574
553575
553576
553577
553578
553579
553580
553581
553582
553583
553584
553585
553586
553587
553588
553589
553590
553591
553592
553593
553594
553595
553596
553597
553598
553599
553600
553601
553602
553603
553604
553605
553606
553607
553608
553609
553610
553611
553612
553613
553614
553615
553616
553617
553618
553619
553620
553621
553622
553623
553624
553625
553626
553627
553628
553629
553630
553631
553632
553633
553634
553635
553636
553637
553638
553639
553640
553641
553642
553643
553644
553645
553646
553647
553648
553649
553650
553651
553652
553653
553654
553655
553656
553657
553658
553659
553660
553661
553662
553663
553664
553665
553666
553667
553668
553669
553670
553671
553672
553673
553674
553675
553676
553677
553678
553679
553680
553681
553682
553683
553684
553685
553686
553687
553688
553689
553690
553691
553692
553693
553694
553695
553696
553697
553698
553699
553700
553701
553702
553703
553704
553705
553706
553707
553708
553709
553710
553711
553712
553713
553714
553715
553716
553717
553718
553719
553720
553721
553722
553723
553724
553725
553726
553727
553728
553729
553730
553731
553732
553733
553734
553735
553736
553737
553738
553739
5537340
5537341
5537342
5537343
5537344
5537345
5537346
5537347
5537348
5537349
5537350
5537351
5537352
5537353
5537354
5537355
5537356
5537357
5537358
5537359
55373510
55373511
55373512
55373513
55373514
55373515
55373516
55373517
55373518
55373519
55373520
55373521
55373522
55373523
55373524
55373525
55373526
55373527
55373528
55373529
55373530
55373531
55373532
55373533
55373534
55373535
55373536
55373537
55373538
55373539
55373540
55373541
55373542
55373543
55373544
55373545
55373546
55373547
55373548
55373549
55373550
55373551
55373552
55373553
55373554
55373555
55373556
55373557
55373558
55373559
55373560
55373561
55373562
55373563
55373564
55373565
55373566
55373567
55373568
55373569
55373570
55373571
55373572
55373573
55373574
55373575
55373576
55373577
55373578
55373579
55373580
55373581
55373582
55373583
55373584
55373585
55373586
55373587
55373588
55373589
55373590
55373591
55373592
55373593
55373594
55373595
55373596
55373597
55373598
55373599
553735100
553735101
553735102
553735103
553735104
553735105
553735106
553735107
553735108
553735109
553735110
553735111
553735112
553735113
553735114
553735115
553735116
553735117
553735118
553735119
553735120
553735121
553735122
553735123
553735124
553735125
553735126
553735127
553735128
553735129
553735130
553735131
553735132
553735133
553735134
553735135
553735136
553735137
553735138
553735139
553735140
553735141
553735142
553735143
553735144
553735145
553735146
553735147
553735148
553735149
553735150
553735151
553735152
553735153
553735154
553735155
553735156
553735157
553735158
553735159
553735160
553735161
553735162
553735163
553735164
553735165
553735166
553735167
553735168
553735169
553735170
553735171
553735172
553735173
553735174
553735175
553735176
553735177
553735178
553735179
553735180
553735181
553735182
553735183
553735184
553735185
553

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Table of Contents

Parties.....	3
Jurisdiction and venue.....	4
Factual Background.....	4
Causes of Action Count I.....	8
(Declaratory Relief per 28 U.S.C. § 2201; Injunctive Relief) (Asserted Against: Shinda; CHV; CAMBA).....	8
Count II.....	15
(Nuisance) (Asserted Against: Shinda; CHV; CAMBA; DOES 1-10).....	15
Prayer Jury Trial Demanded.....	20
Exhibit a.....	1
(38 Pages including this cover page).....	1

PARTIES

1.

Darryl Chadwick Carter is a natural person and the plaintiff in this action.

Plaintiff's current address is 690 Albany Avenue, Apt. 2K, Brooklyn, NY 11203.

2.

Defendant ***Camba Housing Ventures, Inc.*** ("CHV") is a domestic not-for-profit corporation whose address is 221-10 Jamaica Avenue, floor 3, Queens Village, NY 11428. Defendant CHV is sued in its **OFFICIAL** capacity. Defendant ***Camba, Inc.*** ("CAMBA") is a domestic not-for-profit corporation whose address is 1720 Church Avenue, Brooklyn, NY 11226. Defendant **CAMBA**, is sued in its **OFFICIAL** capacity. Defendant ***Shinda Management Corporation*** ("SHINDA"), is a domestic business corporation whose address is 221-10 Jamaica Avenue, floor 3, Queens Village, NY 11428. Defendant SHINDA is sued in its **OFFICIAL** capacity. Defendants DOES 1-10 are occupants of residential property owned by CAMBA via management care of SHINDA and/or CHV including tenants in apartment 2I, 2J, and several others on different floors. Plaintiff does not know the true identity of such individuals. The complaint will be amended with the true and correct identity of said DOES during the course of one or more pre-trial stages.

JURISDICTION AND VENUE

3.

5 Plaintiff brings this action per 28 U.S.C. § 1331. Venue is appropriate per 28
6 U.S.C. § 1391 (b) (1).

FACTUAL BACKGROUND

10 4.

12 On January 12, 2024, plaintiff per a lease rental agreement with defendant
13 CHV and care of defendant SHINDA, began occupancy of a residential unit per a
14 New York City Fheps Voucher (“CityFHEPS”). Plaintiff is identified in the lease
15 agreement by his legal name Darryl Chadwich Carter. See Exhibit A, item #1,
16 attached hereto.

19 5.

21 Notwithstanding said lease agreement, per item #4 above, defendants
22 SHINDA and/or CHV certified to the New York City Department of Health and
23 Mental Hygiene that plaintiff had a mental health condition whereas plaintiff never
24 had a mental health condition. Defendants CHV and/or SHINDA received rental
25 payment for plaintiff’s unit from the New York City Department of Health and
26
27

Mental Hygiene aka Department of Mental Health (“DOMH”). Program Specialist Lenora Browning employed with the New York City Department of Health and Mental Hygiene oversees the program which paid defendants SHINDA and/or CHV rental payment’s for plaintiff’s residential unit. See Exhibit A, item #2, attached hereto.

6.

Plaintiff obtained an undergraduate Bachelor Degree in Electronics Engineering and a graduate Master Degree in Business Management concentrating in Project Management. Additionally, plaintiff has more than 20 years experience in software engineering and technical project management.

7.

On August 5, 2024 @ or around 11:09 am, plaintiff submitted a complaint to CHV and/or SHINDA per “repeated noise violations” regarding the tenants in the apartment across the hall in “2I.” See **Exhibit A**, item #3, attached hereto.

8.

On August 7, 2024, plaintiff sent program specialist Lenora Browning an email with the subject line: "Follow Up Ongoing Police Issues with Camba."

1 regarding the tenants in the apartment across the hall in "2I." See Exhibit A, item
2 #4, attached hereto.
3

4 9.
5

6 On September 7, 2024 @ 2:55:46 PM, plaintiff submitted a loud music/party
7 complaint to 311 to be serviced by the New York Police Department and identified
8 as 311-19971583 regarding the tenants in the apartment across the hall in "2I." The
9 New York Police Department later closed the complaint with the statement: "The
10 Police Department responded to the complaint and took action to fix the
11 condition." See Exhibit A, item #5, attached hereto.
12
13

14 10.
15

16 On December 25, 2024 @ or around 10:52 pm, plaintiff sent defendant
17 SHINDA and/or CHV and email with the subject line: "12/25/2024: Failure Notice
18 – Shinda Management Blocking Emails to Avoid Knowledge of Complaints or
19 Otherwise Furthering the Underlying Issues[.]" The email was direct to SHINDA
20 assistant manager Vanessa Smith. The email bounced back as with the following
21 comment: "550: 5.4.1 Recipient address rejected: Access denied
22 [CY4PEPF0000EE3B.namprd03.prod.outlook.com 2024-12-26T03:53:17.840Z
23 08DD2248B98F7CC4][]" See Exhibit A, item#6, pgs. 2-3, attached hereto.
24
25
26
27
28

11.

On January 1, 2025, @ or around 1:11 pm, plaintiff sent SHINDA representative Jamal Coull and the New York Police Department an email, with the subject line: "Second Notice Civil Nuisance Apartment 2I, 690 Albany Avenue, Brooklyn, NY[.]" See Exhibit A, item #7, attached hereto.

12

On March 11, 2025, plaintiff mailed a certified letter per article # 9589-0710-5270-0745-7333-07 to SHINDA address to assistant manager Vanessa Smith, complaining of “Nuisance” and “Maintenance and Repair,” issues. Also, plaintiff requested for defendant SHINDA and/or CHV to deliver a copy of plaintiff’s CityFHEPS voucher as plaintiff, so that plaintiff could seek occupancy with another residential facility, since plaintiff had not intention of responding in the affirmative regarding defendant SHINDA’s and/or CHV’s “Recertification” request since plaintiff complained of issues with fraud. See Exhibit A, item #8, attached hereto.

13

On April 13, 2025 @ or around 5:55 PM, plaintiff sent defendant(s) SHINDA and/or CHV an email with the subject line: "April 13, 2025: Camba, Shinda Complaint: Litigation Hold Documentation[.] Plaintiff included, *inter*

1 *alia*, New York City HPD, Lenora Browning, New York Police Department, and
2 the New York City Council on said email. See Exhibit A, item #9, attached hereto.
3

4 14.
5

6 **CAUSES OF ACTION**
7 **COUNT I**

8 **(DECLARATORY RELIEF PER 28 U.S.C. § 2201; INJUNCTIVE RELIEF)**

9 **(ASSERTED AGAINST: SHINDA; CHV; CAMBA)**

10 15.
11

12 Plaintiff alleges and incorporates ¶¶ 1-13 as though fully set forth herein.
13 Additionally, plaintiff incorporates Exhibit A attached hereto and attests to the
14 same as authentic, true, and correct copies of said documentation.
15

16 16.
17

18 Defendant CAMBA is the property owner who appointed SHINDA and/or
19 CHV as its agent, for residential management activities of its property, and in
20 particular plaintiff's residential property in question. At no time in plaintiff's life
21 has he ever been under the employment, directly or indirectly, with law
22 enforcement nor any employment or contract with the United States federal
23 government in any capacity, whatsoever, including and especially any Department
24 of Defense "Black Ops" team. Plaintiff never received any monetary payments or
25

1 any other type of tangible or intangible gain from the federal government related to
2 any type of employment since none ever existed.
3

4 17.

5 Since the outset of this relationship with defendants CAMBA, SHINDA,
6 and/or CHV, plaintiff has been burdened with very serious issues which plaintiff
7 characterized as fraud, a civil nuisance with one or neighbors involving drug
8 trafficking and/or use, intentional nuisance loud noise, threats, and plaintiff's
9 repeated complaints of abuses involving 702 FISA PRISM with respect to hidden
10 camera devices in plaintiff's unit where plaintiff was and is being watched or
11 monitored on camera constantly as part of a political criminal cover up between
12 the now departed Biden Administration and the, now, Trump Administration.
13

14 18.

15 It is this political criminal cover up, *ante*, which has driven the relationship
16 between defendants CAMBA, SHINDA, and/or CHV and plaintiff, and in
17 particular the false and utterly fraudulent representation that plaintiff had and/or
18 has a mental condition thereby qualifying his unit to be paid, by the what CAMBA
19 representative Ms. Gore characterized as, DOMH *i.e.* the Department of Mental
20 Health. Moreover, the basis for the in home residential camera monitoring, since
21 virtually day one was the outgoing Biden Administration's criminal cover up
22

Darryl C. Carter vs. Camba Housing Ventures, Inc., et al

1 schemes whereas his administration rigged one or more of plaintiff's civil actions
2 in the Southern District of New York with the intent of embezzlement to the
3 advantage of WOKE operatives, coupled with 702 FISA PRISM and direct willful
4 abuses via Biden's Intelligence Community *i.e.* the F.B.I and/or CIA with the aim
5 and intent of persuading plaintiff to leave the country via the Mexico or Canada
6 border via stalking and communicating with plaintiff via government shadow
7 communications and tracking which also directly involved members of SHINDA
8 and/or CHV such as Jamal Coull and Vanessa Smith. There is no mystery to these
9 federal government abuses as the Red team under Trump and MAGA has
10 complained for years of verified issues such as "Lawfare," and "Gaslighting,"
11 and "Government Weaponization" against civilians using the courts and the
12 federal government's Intelligence Community. In fact, **JudicialWatch.org** and
13 others have featured all of these topics especially "Government Weaponization"
14 and "Lawfare" in depth over the past several years leading up to and through the
15 2024 presidential election; let, alone, a dozen or so **JudicialWatch** led FOIA
16 lawsuits related thereto.

17
18
19
20
21
22
23
24
25
26
27
28
19.

At the same time, the Red team under then candidate Trump was, also,
engaging in the same activities *i.e.* stalking and communicating with plaintiff via

1 shadow communications and tracking with the aim and intent of causing plaintiff
2 to leave the country via the Mexico or Canada border as part of a “White Cover
3 up,” to make plaintiff “Dead” or “Disappear” such as to evade the WOKE regime
4 and therefore curtail the money embezzlement schemes of team WOKE under
5 Biden’s Administration. Furthermore, the Red team under then candidate Trump
6 deployed stalking, tracking, harassing, and using the federal government’s
7 intelligence to harass plaintiff under the auspicious of plaintiff being aligned with
8 WOKE, which was categorically false. And even, if so, which it was never so, the
9 government has never been authorized to use the intelligence community to engage
10 in civilian “Weaponization,” which is particularly troubling given team Trump
11 complained extensively of the Biden Administration’s “Weaponization,” activities
12 while team the Red team, under then candidate Trump, engaged in the same
13 activity against plaintiff. In short, plaintiff was intentionally situated at the
14 CAMBA and/or CHV property as part of political criminal cover up to which
15 CAMBA and/or CHV were direct participants and knew from day one the scope
16 of their involvement; let alone the fact that the goal was to dupe plaintiff into
17 leaving the premises and the country pursuant some Jesus BS scam which was
18 nothing more than a political party cover up from the beginning. The political
19 cover up in essence is founded upon the hidden and concealed social and political
20 warfare between Blacks (WOKE) and Whites (MAGA). The entire period of
21
22
23
24
25
26
27
28

1 plaintiff's occupancy with CAMBA and/or CHV plaintiff has been barraged with
2 verified instances per still pictures, videos, and police reported incidents of
3 political operatives, *ante*, tracking and stalking plaintiff, again, trying to dupe
4 plaintiff to leave the country to plaintiff's detriment on some Jesus BS scam.
5
6

7 20.
8
9

10 The United States Constitution does not require plaintiff be a member of any
11 political party to exercise his Constitutional Rights including but not limited to due
12 process, privacy (Bill of Rights), equal protection, freedom of religious belief-
13 association, and freedom of speech. Furthermore, the United States Constitution
14 does not reference anything about any political party whatsoever.
15

16 21.
17
18

19 Notwithstanding plaintiff's constitutional and statutory rights, defendants
20 CAMBA and/or CHV knowingly and willfully participated in a political criminal
21 cover up scheme involving the fraudulent representation to the City of New York
22 via one or more of its Departments, *ante*, that plaintiff had a mental health
23 condition as the basis for collecting ill gotten gains from the City of New York.
24 Moreover, it is for these reasons *i.e.* the political party criminal cover up scheme,
25 that CAMBA and/or CHV never took any affirmative actions to abate the civil
26 nuisance situation(s) with neighbors and drug trafficking-use, since the direct
27
28

1 intent was to cause the nuisance conditions to rise to the level of forcing plaintiff to
2 leave the premises on some Jesus BS scam to plaintiff's detriment.
3

4 22.

5 CAMBA as the property owner knew of should have known of the
6 [mis]management activities of its agent(s) SHINDA and/or CHV, if nothing else
7 via periodic audits. Moreover, CAMBA cannot position SHINDA and/or CHV as
8 its agent as a means to shield itself from liability driven by its agents who operated
9 under the expressed direction and consent of CAMBA.
10
11

12 23.

13 Plaintiff seeks a declaration that he is the victim of a well orchestrated
14 political criminal cover up scheme to which CAMBA, CHV, and SHINDA were
15 participants; A declaration that plaintiff has a cause of action for fraud against the
16 federal government for its role under the outgoing and current administrations for
17 their role in the fraud scheme which has literally cost plaintiff hundreds of
18 thousands in damages if not more, whereas the federal government via its political
19 parties, *ante*, targeted plaintiff with the most heinous and egregious type of
20 conduct a government could carry out i.e. deploying the federal government's
21 Intelligence Community (Civilian Weaponization) to stalk, track, harass, and target
22 plaintiff pursuant criminal cover up schemes using 702 FISA PRISM, while
23
24

1 engaging CAMBA, SHINDA, and/or CHV to posit that plaintiff had a mental
2 health condition; thus discrediting plaintiff's allegations of federal government
3 abuse of power (702 FISA PRISM, domestic espionage, 4th Amendment violations,
4 etc.), corruption, fraud, weaponization, and criminal cover ups; a declaration that
5 plaintiff arrived at the residence in question owned by CAMBA, by way of a 100%
6 fully paid CityFHEPS voucher, and at no time did plaintiff ever have any mental
7 health condition from which CAMBA, as a beneficiary, per SHINDA and/or
8 CHV's rent collection activities were entitled to collect and receive rents from the
9 City of New York predicated on any type of mental health condition and that doing
10 so constituted fraud; a declaration that plaintiff has a cause of action against
11 CAMBA, SHINDA, and/or CHV for its actions and activities with respect to its
12 misrepresentation that plaintiff had any type of mental health condition; thus,
13 severely damaging plaintiff's reputation and causing astounding economic
14 damages to date and forward looking.

20
21 24.
22

23 Plaintiff seeks to enjoin the residential harassment with respect to
24 SHINDA's and/or CHV's failure to abate the herein identified nuisance activities
25 with tenants including repeated intentional very loud noise violations, tenant trash
26 outside the door, tenants stalking plaintiff's apartment yelling obscenities, tenants
27

1 threatening plaintiff, tenant drug use, tenant drug trafficking, SHINDA's and/or
2 CHV's persistent illicit camera monitoring inside plaintiff's residential unit
3 including the restroom; to enjoin the misrepresentation of the name "DARRYL
4 CARTER" on fraudulent billing statements directed to plaintiff; to enjoin the
5 withholding of plaintiff's CityFHEPS voucher which plaintiff requires to seek
6 residential occupancy elsewhere; to enjoin the installation and/or further use of any
7 camera monitoring device in plaintiff's residential dwelling and to immediately
8 and promptly remove the same; to enjoin the further use of any 702 FISA PRISM
9 activities whatsoever which were predicated upon fraud in the first place; and to
10 enjoin harassment, stalking, tracking, or targeting of plaintiff in any way shape or
11 form.
12
13
14
15

16 25.
17
18
19
20

COUNT II
(NUISANCE)

(ASSERTED AGAINST: SHINDA; CHV; CAMBA; DOES 1-10)

21 26.
22
23
24

Plaintiff alleges and incorporates ¶¶ 1-13 as though fully set forth herein.
Additionally, plaintiff incorporates Exhibit A attached hereto and attests to the
same as authentic, true, and correct copies of said documentation.

25 27.
26
27
28

1
2
3
28.

4 CAMBA, as the owner of the real property in question, directed SHINDA
5 and/or CHV as to the policies, practices, and operations of its residential facilities
6 especially as it pertains to engaging with the City of New York for guaranteed
7 rents from individuals holding housing vouchers, individuals with disabilities, and
8 low income tenants.

11
12
13
29.

14 SHINDA and/or CHV directly knew about plaintiff's complaints per
15 nuisance activities especially since plaintiff contact Lenora Browning on more
16 than one occasion regarding nuisance and criminal activities with DOES.
17 Moreover, SHINDA assistant manager Vanessa Smith started blocking plaintiff's
18 emails and communications, following said complaint to Lenora Browning and the
19 New York Police Department such as to evade responsibility for addressing the
20 nuisance activities it employed which routinely and regularly interfered with
21 plaintiff's quiet enjoyment of the dwelling.

24
25
26
27
28
30.

1 SHINDA's and/or CHV's failure, which on its face shows intent, to address
2 the nuisance activities illustrates mismanagement and how both SHINDA and/or
3 CHV were involved in the political criminal government schemes, the aim of
4 which was to force plaintiff off of the premises in bad faith, notwithstanding
5 concurrently collecting rent monies from the City of New York predicated upon
6 fraud i.e. falsely certifying that plaintiff had a mental condition for disability which
7 never existed. SHINDA's and/or CHV's breach of their duties under the law has
8 subjected plaintiff to persistent and consistent emotional distress; let alone a hostile
9 situation with tenant threats from across the hall in apartment "2I" and tenant drug
10 use/trafficking out the the adjacent apartment in "2J." Moreover, the premises has
11 a history of drug trafficking as the New York Police Department raided the
12 residence of drug trafficking "Kingpin" living in the adjacent building, also, owned
13 by CAMBA and under the management of SHINDA and/or CHV. And SHINDA's
14 and/or CHV's fraud related to plaintiff's mental health has severely and
15 catastrophically injured plaintiff's reputation and employment prospects.
16
17

31.

24 It is well settled in New York that: "a nuisance which results in substantial
25 continuing damage to neighbors must be enjoined. (*Whalen v. Union Bag & Paper*
26 *Co.*, 208 N.Y. 1; *Campbell v. Seaman*, 63 N.Y. 568; see, also, *Kennedy v. Moog*
27

1 *Servocontrols*, 21 N.Y.2d 966.) " See, *Boomer v. Atl. Cement Co.*, 26 N.Y.2d 219
2 (1970). And maintenance of a "Nuisance is based upon the maxim that "a man
3 shall not use his property so as to harm another" (*Joyce, Law of Nuisance*, p 45;
4 see, also, *Copart Inds., v Consolidated Edison Co.*, 41 N.Y.2d 564). It traditionally
5 required that, after a balancing of risk-utility considerations, the gravity of the
6 harm to a plaintiff be found to outweigh the social usefulness of a defendant's
7 activity. (Prosser, *Law of Torts* [4th ed], p 581" See, *Little Joseph v. Babylon*, 41
8 N.Y.2d 738 (1977).
9
10
11

32

14 Defendants not only failed to act in good faith and intentionally maintained
15 a nuisance, with the aim and intent of forcing plaintiff out of his premises,
16 defendants SHINDA and/or CHV failed to address the nuisance actors since they
17 are Black and SHINDA and/or CHV disproportionately and willfully, permits
18 violations and criminal behavior committed by Blacks as SHINDA and/or CHV is
19 WOKE and/or supports the Black WOKE agenda. Furthermore, SHINDA and/or
20 CHV continued to allow the nuisance even after one or more complaints to the
21 New York City HPD office which has housing code enforcement authority over
22 property owners with respect to maintenance and repairs. According to the New
23 York City HPD Online, as of April 13, 2025 SHINDA and/or CHV has 69
24
25
26
27

1 reported complaints over the course of just over a year; two closed litigation
2 actions and one pending litigation; fifteen cited work orders requiring payment(s)
3 by SHINDA and/or CHV of \$1,108.23. And this is against the backdrop of
4 CAMBA, who filed a 2022 tax return (Form 990) with the Internal Revenue
5 Service showing net earnings of over \$238 million and net assets of over \$19
6 million. Additionally, in the same tax year 2022, CAMBA Inc., reported salaries
7 paid to: Joanne M. Oplustil, \$600, 604; David A. Rowe, \$607, 436; Valerie A.
8 Barton-Richardson, \$436,969 ;Thomas Dambakly, \$405, 000, to name a few.
9
10
11
12 33.
13
14 Plaintiff seeks compensatory damages of \$100,000 for the fraud, reputation
15 damage, economic losses both past and forward looking related thereto, and the
16 persistent emotional stress and trauma dealing with the mismanagement of
17 CAMBA properties, per their agents SHINDA and/or CHV. Plaintiff further seeks
18 a declaration that plaintiff's living arrangements with SHINDA and/or CHV were
19 predicated on fraud and misrepresentation of plaintiff's mental health; a
20 declaration that plaintiff's misrepresentations regarding plaintiffs mental health
21 entitles plaintiff to an action for fraud; a declaration that CAMBA has abused its
22 501 (c) status to the detriment of the clients, including plaintiff, it alleges to serve;
23 but, its true aim is to collect windfalls of grants from federal and/or state sources
24
25
26
27
28

1 with which it pays several of its management team \$400,000 or more in annual
2 salaries while refusing to make maintenance and repairs to plaintiff's unit.
3

4 34.
5

6 **PRAYER**
7 **JURY TRIAL DEMANDED**
8

9 35.
10

11 **WHEREFORE**, plaintiff pray for judgment against defendants and others as
12 follows:
13

14 **Regarding the first claim of relief (Declaratory and Injunctive Relief):**
15

16 1. Plaintiff seeks a declaration that he is the victim of a well orchestrated
17 political criminal cover up scheme to which CAMBA, CHV, and SHINDA
18 were participants; A declaration that plaintiff has a cause of action for fraud
19 against the federal government for its role under the outgoing and current
20 administrations for their role in the fraud scheme which has literally cost
21 plaintiff hundreds of thousands in damages if not more, whereas the federal
22 government via its political parties, *ante*, targeted plaintiff with the most
23 heinous and egregious type of conduct a government could carry out *i.e.*
24 deploying the federal government's Intelligence Community (Civilian
25 Weaponization) to stalk, track, harass, and target plaintiff pursuant criminal
26
27
28

Darryl C. Carter vs. Camba Housing Ventures, Inc., et al

1 cover up schemes using 702 FISA PRISM, while engaging CAMBA,
2 SHINDA, and/or CHV to posit that plaintiff had a mental health condition;
3 thus discrediting plaintiff's allegations of federal government abuse of
4 power (702 FISA PRISM, domestic espionage, 4th Amendment violations,
5 etc.), corruption, fraud, weaponization, and criminal cover ups; a declaration
6 that plaintiff arrived at the residence in question owned by CAMBA, by way
7 of a 100% fully paid CityFHEPS voucher, and at no time did plaintiff ever
8 have any mental health condition from which CAMBA, as a beneficiary, per
9 SHINDA and/or CHV's rent collection activities were entitled to collect and
10 receive rents from the City of New York predicated on any type of mental
11 health condition and that doing so constituted fraud; a declaration that
12 plaintiff has a cause of action against CAMBA, SHINDA, and/or CHV for
13 its actions and activities with respect to its misrepresentation that plaintiff
14 had any type of mental health condition; thus, severely damaging plaintiff's
15 reputation and causing astounding economic damages to date and forward
16 looking.

23
24 2. Plaintiff further seeks to enjoin the residential harassment with respect to
25 SHINDA's and/or CHV's failure to abate the herein identified nuisance
26 activities with tenants including repeated intentional very loud noise
27 violations, tenant trash outside the door, tenants stalking plaintiff's
28

1 apartment yelling obscenities, tenants threatening plaintiff, tenant drug use,
2 tenant drug trafficking, SHINDA's and/or CHV's persistent illicit camera
3 monitoring inside plaintiff's residential unit including the restroom; to enjoin
4 the misrepresentation of the name "DARRYL CARTER" on fraudulent
5 billing statements directed to plaintiff; to enjoin the withholding of
6 plaintiff's CityFHEPS voucher which plaintiff requires to seek residential
7 occupancy elsewhere; to enjoin the installation and/or further use of any
8 camera monitoring device in plaintiff's residential dwelling and to
9 immediately and promptly remove the same; to enjoin the further use of any
10 702 FISA PRISM activities whatsoever which were predicated upon fraud in
11 the first place; and to enjoin harassment, stalking, tracking, or targeting of
12 plaintiff in any way shape or form.

17 **Regarding the second claim of relief (Nuisance):**

18

19 1. Plaintiff seeks compensatory damages of \$100,000 for the fraud, reputation
20 damage, economic losses both past and forward looking related thereto, and
21 the persistent emotional stress and trauma dealing with the mismanagement
22 of CAMBA properties, per their agents SHINDA and/or CHV.

23

24 2. Plaintiff further seeks a declaration that plaintiff's living arrangements with
25 SHINDA and/or CHV were predicated on fraud and misrepresentation of
26

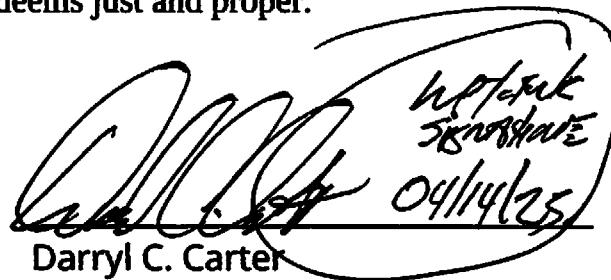
Darryl C. Carter vs. Camba Housing Ventures, Inc., et al

1 plaintiff's mental health; a declaration that plaintiff's misrepresentations
2 regarding plaintiffs mental health entitles plaintiff to an action for fraud; a
3 declaration that CAMBA has abused its 501 (c) status to the detriment of the
4 clients, including plaintiff, it alleges to serve; but, its true aim is to collect
5 windfalls of grants from federal and/or state sources with which it pays
6 several of its management team \$400,000 or more in annual salaries while
7 refusing to make maintenance and repairs to plaintiff's unit.
8
9

10
11 **Regarding all claims for relief:**

12
13 1. An order for all defendants to pay any and all of plaintiff's costs pursuant
14 this action, including attorney fees, to the extent incurred, pursuant the work
15 expended for this action.
16
17 2. Equitable recovery of plaintiff's time pursuing this action.
18
19 3. Any further relief that the Court deems just and proper.

20
21
22 DATED: April 14, 2025
23
24

25
26
27
28

Darryl C. Carter
4/14/25
Handwritten signature
04/14/25