STATE OF MICHIGAN

WAYNE COUNTY CIRCUIT COURT

MAX GARBARINO,
DAVID ADAMCZYK

Plaintiff,

Case No: 2025-008377-CK
vs. Honorable Edward J Joseph

CITY OF HAMTRAMCK, and
ABU MUSA, and KHALIL REFAI,
MOHAMMED HASSAN, and
MUHITH MAHMOOD, and
MOHAMMED ALSOMIRI, and
MUHTASIN SADMAN,
MAYOR AMER GHALIB,
POLICE CHIEF JAMIEL ALTAHERI in their individual capacities.
Defendant.

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There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge, nor do I know of any other civil action, not between these parties, arising out of the same transaction or occurrence as alleged in this Complaint that is either pending or was previously filed and dismissed, transferred or otherwise disposed of after having been assigned to a Judge in this Court.

AMENDED COMPLAINT AND JURY REQUEST

NOW COMES the Plaintiffs, Max Garbarino and David Adamczyk, by and through his attorneys, MARKO LAW, PLLC, and for their Amended Complaint against the above-named Defendants, states as follows:

JURISDICTION & VENUE

1. Jurisdiction is proper because the amount in controversy exceeds this Court's jurisdictional limit, not including costs, interests, and attorney fees.

2. The transactions and occurrences giving rise to this action took place in the County of Wayne, State of Michigan.

PARTIES

3. Plaintiff Max Garbarino resides in the County of Macomb, State of Michigan.

4. Plaintiff David Adamczyk resides in the County of Macomb, State of Michigan.

5. Defendant City of Hamtramck is a municipal government entity located in the County of Wayne, State of Michigan.

6. Defendant Abu Musa, at all times relevant to this Complaint, was a councilman for the City of Hamtramck, and by all information and belief, resides in the County of Macomb, State of Michigan.

7. Defendant Khalil Refai, at all times relevant to this Complaint, was a councilman for the City of Hamtramck, and by all information and belief, resides in the County of Wayne, State of Michigan.

8. Defendant Mohammed Hassan, at all times relevant to this Complaint, was a councilman for the City of Hamtramck, and by all information and belief, resides in the County of Wayne, State of Michigan.

9. Defendant Muhith Mahmood, at all times relevant to this Complaint, was a councilman for the City of Hamtramck, and by all information and belief, resides in the County of Wayne, State of Michigan.

10. Defendant Mohammed Alsomiri, at all times relevant to this Complaint, was a councilman for the City of Hamtramck, and by all information and belief, resides in the County of Wayne, State of Michigan.

11. Defendant Muhtasin Sadman, at all times relevant to this Complaint, was a councilman for the City of Hamtramck, and by all information and belief, resides in the County of Macomb, State of Michigan.

12. Defendant Mayor Amer Ghalib at all times relevant to this Complaint, was the Mayor of the City of Hamtramck, and by all information and belief, resides in the County of Wayne, State of Michigan.

13. Defendant Police Chief Jamiel Altaheri at all times relevant to this Complaint, was the Police Chief for the City of Hamtramck, and by all information and belief, resides in the County of Wayne, State of Michigan.

FACTUAL ALLEGATIONS

14. Plaintiff, by reference, incorporates the preceding paragraphs as though fully set forth herein.

Plaintiff Max Garbarino

15. Since 2001, Plaintiff has dedicated his life to serving the Defendant City of Hamtramck.

16. From 2001 to 2015, he rose through the ranks of Officer, Sergeant, Lieutenant, and eventually Chief of Police of Hamtramck Police Department. From 2020-2022 he served as Director of Community Safety and Services.

17. From 2022-2024 Plaintiff served as Interim City Manager. He has served as City Manager from February 14, 2024, to May 27, 2025, when he was unlawfully put on paid administrative leave in retaliation for reporting disturbing wrongdoings involving numerous individuals in the City of Hamtramck.

18. As City Manager, Plaintiff worked closely with the Defendant City of Hamtramck, and Defendants Abu Musa, Khalil Refai, Mohammed Hassan, Muhith Mahmood, Mohammed Alsomiri, Muhtasin Sadman, and Defendant Police Chief Jamiel Altaheri who entrusted him to be the chief administrative officer responsible for all personnel decisions, including the power to appoint, suspend, or remove department heads.

Plaintiff David Adamczyk

19. Plaintiff David Adamczyk served as a police officer from September to November 2024, before being appointed as a special investigator assigned to fraud cases, working directly under the Defendant Police Chief Jamiel Altaheri. During his tenure, he championed and led the Hamtramck Police Citizens Academy.

20. As a Special Investigator, Plaintiff worked closely with department heads, and city Attorney with respect to special investigations surrounding income tax fraud, illegal business operations, and served as one of the investigators for the council residency investigation.

Election Fraud Investigation

21. Beginning in late 2023, City Clerk Rana Faraj and her staff observed repeated irregularities with absentee ballots, including identical handwriting on ballot envelopes and large bundles deposited at one time.

22. Plaintiff Garbarino advised Faraj to report these irregularities to the Hamtramck Police Department.

23. Then-Police Chief Anne Moise opened a file, but initially struggled to secure an outside agency willing to investigate.

24. In early 2024, the Michigan Attorney General accepted the case and assigned an investigator who spent six months interviewing witnesses and reviewing surveillance footage from City Hall drop boxes.

25. By October 2024, Michigan Attorney General Dana Nessel still failed to bring charges.

26. Throughout the investigation the six council members harassed both Plaintiff Garbarino and Faraj and tried to force Plaintiff to fire Faraj.

27. Throughout this time, Plaintiff Garbarino would receive constant complaints that the Defendants would improperly help people with their ballots, lurk around the voting centers, and enter restricted areas within poling places.

28. On March 12, 2025, Plaintiff Garbarino and Faraj each sent detailed letters to the Attorney General demanding that the office act on the evidence showing clear irregularities in the 2023 election. **Exhibit 1 – Garbarino Letter; Exhibit 2 – Faraj Letter.**

29. The letters express their frustration that despite numerous reports and evidence, and the issue being sent to the County, State, Michigan State Police, and Attorney General's office, that still, nothing significant has been done to hold anyone accountable.

30. The letters further explain there are cameras that have captured clear evidence of suspicious activities, including multiple instances of large batches of absentee ballots being dropped into boxes at once and that a Defendant openly bragged that "no one can touch him."

31. Plaintiff Garbarino states in his letter that "we already have a councilman who boasted during a council meeting that he has been investigated eight times and that 'they haven't gotten me.'" Plaintiff Garbarino explained that the election fraud in the City is "catastrophic."

32. Following this letter, Defendant Hassan stormed into Plaintiff Garbarino's office and tried to pressure Plaintiff Garbarino to terminate Faraj.

33. On April 23, 2025, Faraj expressed concerns to both Plaintiffs that some Defendants have been making comments during meetings and in private that she feels like are "targeted harassment." She noted they say things like "we are watching you," and they make a point to bring up when people arrive and leave the building, which is clear they are talking about her.

34. There was recommendation for a warrant on October 16, 2023, for Defendant Hassan and October 17, 2023, for Defendant Sadman.

35. The dates of the alleged incidents listed in the court records were on September 4, 2023, for Defendant Hassan, and July 1, 2023, for Defendant Sadman; both were running for election that year and won council seats.

Residency and Indebtedness Investigation

36. There were widespread rumors for years that several council members no longer lived in Hamtramck.

37. Defendant Hassan sent anonymous emails and letters to City officials using a false identity, alleging that other council members were non-residents.

38. A video shows Defendant Hassan personally delivering the anonymous letters.

39. The Election Committee, consisting of Plaintiff Garbarino, the city clerk, city attorney, and Chief of Police, voted to adopt a strengthened affidavit process requiring each candidate to certify one-year residency and no outstanding debts to the City.

40. Each candidate, including incumbents, signed an affidavit certifying one-year residency in Hamtramck and that he or she was not indebted to the City.

41. Plaintiff Garbarino reported these residency issues to the attorney general.

42. Plaintiff Garbarino hired independent private investigators to investigate each candidate and incumbent's residency.

43. Plaintiff Garbarino again reported these residency issues to the attorney general.

44. The investigation confirmed on April 24, 2025, that two sitting council members, Defendants Musa and Muhith did not reside within Hamtramck city limits. **Exhibit 3.**

45. Plaintiff presented these findings to Council and asked the body to declare the seats vacant in accordance with Charter section 6-08, which bars non-residents from office.

46. The six Defendant council members unsurprisingly voted to disregard the evidence and keep Defendant's Musa and Refai both in office and on the August ballot.

47. On May 5, 2025, Plaintiff Garbarino wrote to Attorney General Nessel and requested she initiate a criminal investigation into serious allegations regarding residency fraud involving the two Defendant councilmembers. **Exhibit 4 – Email**

48. On May 7, 2025, Plaintiff Adamczyk informed the Michigan State Police of residency fraud concerns.

49. On May 9, 2025, Plaintiff Garbarino advised Defendant Mahmood that the Michigan State Police is investigating his residency issues too.

50. On May 13, 2025, Defendant Mahmood unintentionally self-incriminated himself on record at a council meeting when he stated that he moved to the city after the date he applied to run for office. [1]

Defendants Improper Interference with Hiring Decisions and Employment Discrimination

51. Throughout Plaintiff Garbarino's tenure the Defendant council members attempted to direct hiring decisions that the Charter assigns to the City Manager. Plaintiff Garbarino is in charge of hiring department heads and Defendants council is simply in charge of approving the hire.

52. The Defendants forced Plaintiff Garbarino to hire Defendant Police Chief Jamiel Altaheri as they would refuse to approve any other hire.

53. Defendants' conduct was not only improper but appeared rooted in discrimination, as Defendants rejected top-ranked candidates without proper explanation, raising serious concerns of unlawful discrimination.

54. On one occasion, four councilmembers called Plaintiff Garbarino in a private conference call to pressure him on hiring decisions, a clear violation of the Open Meetings Act.

[1] https://www.youtube.com/watch?v=QYqBHI2wUy4 around 1:20

55. Defendants' improper interference led to three separate searches for a City Treasurer, as Defendant council rejected the top-ranked candidates forwarded by Plaintiff.

Plaintiff Garbarino's Performance Review Based on Defendant's Personal Agendas

56. On December 10, 2024, Plaintiff Garbarino wrote an email to the City Attorney Odey Meroueh advising him that his performance review appeared to be less about his performance, and more about several Defendant Councilmen's personal agendas. **Exhibit 5.**

57. Plaintiff Garbarino explained that Defendant Alsomiri is upset about park improvements, which he believes negatively effects his business (despite voting yes on it), and also mad that his family has received clear violations relating to safety on his commercial building.

58. Plaintiff Garbarino alleges that Defendant Alsomiri is also mad over the fact he has positive relationships with the Imams in the city, which he states is dangerously encroaching on his freedom of speech.

59. Plaintiff Garbarino states that Defendant Mahomood is clearly upset over his candidate not being selected for the treasurer position, as well as upset over code enforcement.

60. Plaintiff Garbarino expressed serious concern that Defendant Hassan is trying to manipulate the other Councilmen to unseat Defendant Musa from the Mayor Pro Tem Position.

61. Plaintiff Garbarino also expressed concern over a fake email Defendant Hassan sent for public comment alleging that Defendant Musa does not reside in the city.

Pride Flag Ban and Discriminatory Firing Demands by Defendant Councilmembers

62. In 2023, the City of Hamtramck enacted a resolution prohibiting the display of the Pride Flag on City-owned flagpoles located along Joseph Campau Avenue.

63. The resolution, passed unanimously by the Defendant's City Council, effectively censored LGBTQ+ expression and viewpoint-specific speech.

64. Plaintiff Garbarino expressed concern over the resolution, which he believed targeted a specific group and sent a harmful message to the community and could violate civil rights laws.

65. Defendant councilmembers pressured Plaintiff Garbarino to fire the City Assessor after he displayed a Pride Flag in his office.

66. Plaintiff Garbarino refused, believing the request to be inappropriate and retaliatory.

67. Defendant councilmembers also pushed Plaintiff to remove the City's Human Resources Director, with Defendant Hassan stating there were "too many Black people" working for the City.

68. Plaintiff objected to these demands, viewing them as discriminatory, in violation of civil rights laws including but not limited to the Elliot Larsen Civil Rights Act and federal law, and entirely unsupported by performance or policy concerns.

Defendant Altaheri Openly Begins Retaliation Toward Plaintiff Adamczyk

69. An email chain on May 12, 2025, details disagreements between Defendant Altaheri and Plaintiff Officer Adamczyk. It started with Plaintiff Adamczyk requesting Defendant Altaheri return his dehumidifier from his home, which Plaintiff Adamczyk apparently loaned to the Chief.

70. The Chief responded that he should not be emailing about non-work issues and then added Plaintiff Garbarino to the email to advise him that Plaintiff Adamczyk has issues with being insubordinate.

71. Plaintiff Garbarino responded and noted that Plaintiff Adamczyk's messages do not seem to be insubordinate and noted that Defendant Altaheri has never informed him of any issues concerning Adamczyk's behavior or work ethic.

72. Plaintiff Garbarino continued and explained issues with Defendant Altaheri's own behavior over the prior few weeks, including challenging reasonable directives, sending communications alleging harassment without justification, and insinuating involvement by Plaintiff in investigations through Plaintiff Adamczyk without Defendant Altaheri's knowledge. Plaintiff Garbarino described Defendant Altaheri's behavior as erratic, factually false, and in some cases blatant lies.

73. Plaintiff Garbarino noted that he previously attempted to address Defendant Altaheri's increasingly close relationship with Plaintiff Adamczyk, and even cautioned him to maintain appropriate boundaries, but he still heavily relied upon him, and now he is claiming that he is suddenly insubordinate and displays poor work ethic.

74. Defendant Altaheri alleges insubordination and poor work ethics, despite honoring him publicly on March 19, 2025, with an "Officer of the Year award".

75. For several months Plaintiff Adamczyk was direct subordinate to Defendant Altaheri with no notice of issues until Plaintiff Adamczyk's reporting and Altaheris start of retaliation in May of 2025.

76. Plaintiff Garbarino sent an email to the City Attorney on May 15, 2025, with these concerns regarding Defendant's Altaheri.

Letter Alleging Serious Misconduct by Police Chief Jamiel Altaheri

77. On April 24, 2025, Plaintiff Officer David Adamczyk sent an email to Plaintiff Garbarino detailing serious concerns with Defendant Police Chief Jamiel Altaheri. **Exhibit 6.**

78. Plaintiff Adamczyk noted he is concerned that his knowledge of the Chief's actions are placing him in jeopardy of his position and employment, and that he is seeing negative activity towards his employment.

79. Plaintiff Garbarino directed Plaintiff Adamczyk to the Michigan State Police and FBI.

80. On May 7, 2025, Plaintiff Adamczyk sent the Michigan State Police a memo alleging serious misconduct by Defendant Police Chief Jamiel Altaheri from September 2024 and May 2025. **Exhibit 7 - Memo**

81. Plaintiff Adamczyk writes that he believes there is evidence to suggest Defendant Altaheri's engaged in a pattern of behavior aimed at grooming members of the department in order to shield or obscure his actions and protect sensitive information.

82. He stated that he reported the information as directed by Plaintiff Garbarino.

83. Plaintiff Adamczyk's memo outlined multiple incidents, as outlined below and in **Exhibit 7.**

Defendant Police Chief Altaheri's History of Domestic Violence

84. Plaintiff Adamczyk describes a disturbing pattern of domestic violence from Defendant Altaheri where officers would respond to his home, but Defendant Altaheri would advise the officers not to report the domestic disputes.

85. One incident included an officer present with Defendant Altaheri and his significant other. His significant other was allegedly intoxicated or possibly using pills and a domestic event happened but was never reported. Per the officers, Defendant Altaheri directed them not to report it.

86. Plaintiff Officer Adamczyk continued and explained that in his position, he has personal knowledge of phone calls and interactions with Defendant Altaheri and his significant other. In two occasions, his significant other made comments that Defendant Altaheri has hit her and punched her. Plaintiff Altaheri attempted to dismiss the allegations by claiming she is "crazy" and an "animal."

87. Plaintiff Officer Adamczyk advised Defendant Altaheri that he is engaging in domestic violence, to which Defendant Altaheri responded "you guys here in Michigan don't handle things the correct way, you guys make everything formal."

88. Plaintiff Officer Adamczyk continued and stated that in December 2024, Defendant Altaheri and his significant other joined Plaintiff Adamczyk's family on a New Year's Eve cruise to the Caribbean.

89. There, Defendant Altaheri's significant other discovered evidence on the Chief's phone relating to an affair he was having with a local school principal at Tau Beta Elementary in Hamtramck.

90. Plaintiff Adamczyk explained that this led to a heated altercation and his significant other reported being physically assaulted by Defendant Altaheri. She claimed he ripped off one of her fingernails.

91. On the cruise, Defendant Altaheri's significant other in party with Plaintiff Adamczyk, his wife, and several cruise guests made statements of concern surrounding domestic violence that the Defendant Altaheri had committed on her.

92. At that time, Plaintiff Adamczyk's wife was fearful of the outcome of the dispute and started to record the conversation, at which point the Defendant Altaheri's significant other acknowledged the recording in the presence of all parties.

93. During this verbal dispute between Defendant Altaheri and his significant other, statements were made that include Defendant Altaheri punching his significant other in the stomach and striking her with a shower curtain. These conversations were recorded by Adamczyk's wife and attached to the memo that was sent to the Michigan State Police

94. The following day, Defendant Altaheri's significant other confined in Officer Adamczyk about ongoing domestic abuse, and explained of an instance where Chief Altaheri locked her inside their home for an extended period, leaving her unable to care properly for their child.

95. The conflict escalated to the point where cruise staff assigned his significant other her own room and Plaintiff Adamczyk made arrangements for her to fly home to New York.

Defendant Altaheri Conspiracy to Bribe And Obtain a Pardon From the President

96. Plaintiff Adamczyk explained that, beginning in December 2024, he was present on multiple occasions where Defendant Altaheri had phone conversations revolving around the Chief facilitating introductions between his New York contacts and Mark Zarkin, whom Chief Altaheri described as a close associate of President Donald Trump.

97. Plaintiff Adamczyk explained that Defendant Altaheri and Zarkin were jointly working on a scheme to secure a presidential pardon for one of the Chief's acquaintances, a wealthy individual from New York who had been charged and/or convicted of serious financial crimes.

98. Many of these conversations took place on phone, as well as in-person at Zarkins business Lellis on the Green in Farmington, where Defendant Altaheri took Plaintiff Adamczyk who was present for these meetings.

99. Defendant Altaheri stated that in exchange for arranging the pardon, a payment between $1 million and $5 million would be made to President Trump through Zarkin.

100. Defendant Altaheri indicated he would make at least ten thousand dollars from the transaction.

101. Plaintiff Adamczyk asserts that Defendant Altaheri traveled with Mark Zarkin to Mar-a-Lago resort to have a meeting with high-profile millionaires with specific conversations taking place with Zarkin regarding his friends from New York.

102. Defendant Altaheri directed Plaintiff Adamczyk to drop him off and pick him up to the airports when he was traveling for these trips.

103. Plaintiff Adamczyk was also present for two physical meetings revolving around advancing the pardon arraignment.

104. The first being at Tim Hortons in Farmington Hills, where it was a private meeting with him, Defendant and Zarkin.

105. The second being March 9, 2025, at Lellis on the Green with multiple parties present, including Ibrahim Aljahim, a convicted pedophile, and Defendant Altaheri friend Ralph from New York who flew in for the meeting.

Defendant Altaheri's role in creating a fake Law Enforcement Identification Card

106. Plaintiff Adamczyk detailed a situation where Defendant Altaheri directed civilian employee Andrew Robinson to create a Hamtramck Police Department Identification card for Mark Zarkin, designating him with the title of "Chief Director."

107. He noted that Defendant Altaheri told him that he received several thousand dollars and that it was necessary to facilitate ongoing efforts with President Trump.

Defendant Altaheri's role in recovering a stolen vehicle and storing Altaheri's home.

108. Plaintiff Adamczyk's memo detailed a situation on March 9, 2025, where Defendant Altaheri's associate Ralph explained to him and Plaintiff Adamczyk that there was a vehicle reported stolen and located in the Dearborn area.

109. Ralph explained that the vehicle was originally involved in a private sale at one of his car lots in New York; a dispute occurred involving the purchaser and her boyfriend, which resulted in the boyfriend taking the vehicle without authorization to Michigan.

110. Plaintiff Altaheri stated that he and Ralph, and another person, Ibrahim Aljahim, would retrieve the vehicle and deliver it to the Defendant new residence in Livonia, where his wife resides.

111. Plaintiff Adamczyk confirmed that the vehicle was stolen and advised Chief Altaheri of the same and requested Defendant Altaheri involve the Dearborn Police Department to properly recover the vehicle.

112. The Chief responded by telling Plaintiff Adamczyk to not ask any questions and to assist Ralph by using an unmarked undercover police vehicle to help facilitate the recovery.

113. Later that evening, Plaintiff Adamczyk followed Ralph and Ibrahim to a condo in Dearborn where Ralph took possession of the vehicle.

114. Once possession took place, Plaintiff Adamczyk followed Ralph and Ibrahim to Defendant Altaheri new home where Alia Hamka's Defendant's new significant other resided, and where Defendant hid the vehicle in the rear yard.

115. Plaintiff Adamczyk asked "what the hell are we doing," to which Defendant Altaheri responded that he and Ralph will handle from there and directed Plaintiff Adamczyk to drive Ibrahim home back to the city.

116. Plaintiff Adamczyk called the NYPD Detective to report that the Chief had the vehicle and was handling it from this point.

117. Following this situation, Defendant Altaheri began to remove Plaintiff Adamczyk from positions, rights and/or assignments.

118. On May 3, 2025, Plaintiff Adamczyk inquired with Ibrahim if the vehicle was returned to New York, to which he responded, yes, he or his family member drove it back to New York.

119. This inquiry to Ibrahim spurred immediate fear in Defendant Altaheri as he immediately called Plaintiff Adamczyk asking what the problem was and why Plaintiff Adamczyk was asking about the vehicle.

120. Within minutes, Plaintiff Adamczyk received a text message from Defendant Altaheri's friend Ralph acknowledging the vehicle was back in New York and confirming the stolen auto case was dropped by the reporting party.

121. Around that time, Defendant Altaheri began to fabricate and solicit factual false and misleading information to Plaintiff Garbarino regarding Adamczyk.

Defendant Altaheri's Improper Role in Influencing Local Elections

122. Plaintiff Adamczyk detailed several incidents in which Defendant Altaheri has actively advocated to members of the City Council for the removal of Plaintiff Garbarino, allegedly in retaliation for the City Manager's role in reporting election fraud concerns.

123. First, Plaintiff Adamczyk explains that Defendant Altaheri is in possession of personal information involving a relative of a current Defendant councilmember, who is suspected of participating in home invasions and deed fraud schemes related to the illegal transfer of property ownership.

124. Second, Plaintiff Adamczyk notes in the memo that Defendant Altaheri has solicited the involvement of Dearborn resident Hass Cash to disrupt City Council meetings and to publicly target Plaintiff Garbarino in an effort to have him removed. He explained that these discussions occurred in his personal office. Hass Cash is a relative of Defendant's Altaheri's wife.

125. Third, Plaintiff Adamczyk states that Defendant Altaheri has had direct access to sensitive election fraud evidence and ongoing investigative updates, and that he strongly believes that Defendant Altaheri is the source of the internal leaks to a suspect councilmember who is under scrutiny.

126. Last, he explained that Defendant Altaheri has misrepresented Plaintiff's Adamczyk's involvement and actions related to the election fraud investigation in an apparent effort to distance himself from the matter publicly. He continues and states that despite this, he still personally authorized various elements of the investigation behind the scenes.

Defendant Altaheri's Role in Improperly Soliciting Money

127. Plaintiff Adamczyk's memo provides a situation where Defendant Altaheri made several attempts to have Plaintiff Adamczyk approach the owner of a towing company to solicit financial sponsorship in the amount of $40,000 and $50,000 to fund a podcast and other related projects.

128. Defendant Altaheri had conversations with the owner of a towing company and informed Plaintiff Adamczyk that he was "good to go" with the sponsorship.

129. Defendant Altaheri then solicited Plaintiff Adamczyk stating that the Defendant and Plaintiff would split those proceeds.

130. Defendant Altaheri said to Plaintiff Adamczyk "we've got to find a way to get paid, make some money."

131. Defendant Altaheri asked Plaintiff Adamczyk to put him on as a sales consultant for Plaintiff's private company, so when money comes in, Defendant Altaheri would receive a percentage.

132. During the first week of March 2025, Defendant Altaheri directed Plaintiff Adamczyk to schedule a meeting with them two and the owner of a towing company to receive sponsorship funds. Defendant Altaheri went out of town and directed him to meet with the towing company owner alone. Plaintiff Adamczyk explained that he did not feel comfortable with this request and refused to take the meeting.

Plaintiff Garbarino's Role in Reporting

133. Plaintiff Adamczyk advised in the memo that Plaintiff Garbarino instructed him to bring these issues to the FBI, and that he also directed him and Sgt. George to bring the information to the Michigan State Police.

Plaintiff Garbarino Places Chief Altaheri on Paid Administrative Leave

134. Charter section 9-18 authorizes the City Manager to place employees on paid leave when he deems it necessary for the good of the City.

135. Charter section 5-01(g) places every department head under the Manager's jurisdiction, and section 7-03 bars council members from interfering with that authority.

136. Upon reviewing the memo and reviewing the recording, Plaintiff determined that the allegations were both credible and grave in nature.

137. In accordance with his responsibilities under the City Charter and consistent with the policies of the City of Hamtramck, Plaintiff Garbarino placed Chief Altaheri on paid administrative leave on May 21, 2025, to allow for a full, impartial investigation.

138. Plaintiff Garbarino attempted to preserve the integrity of the criminal investigation by not suspending Defendant Altaheri immediately, but when he started getting more unstable and Plaintiff Garbarino was getting human resources complaints about his behaviors and his behavior was getting more erratic. Plaintiff Garbarino got worried that the situation was digressing rapidly and was fearful of what he could do as he was also threatening officers.

Plaintiff Garbarino orders Officer Mileski to Plaintiff Adamczyk on Administrative Leave

139. Plaintiff Garbarino ordered Officer Mileski to place Plaintiff Adamczyk on administrative leave to protect him for further retaliation from Defendants, and to safeguard the integrity of the investigation.

140. Plaintiff Garbarino retained an outside investigative firm to handle the investigation into both Chief Altaheri and Plaintiff Adamczyk. Plaintiff also notified the Michigan State Police of the allegations.

141. Plaintiff Adamczyk, the complaining party in a whistleblower matter, was ordered by Deputy Chief Andrew Mileski to surrender all department-issued credentials and weapons, despite his protected status under the Whistleblowers' Protection Act**.**

Additional Misconduct by Defendant Police Jamiel Altaheri

142. Defendant Altaheri advised Plaintiff Garbarino that police officer Justin Rankin was putting false information on his timecard. Plaintiff advised Altaheri that he should fire him, and Altaheri indicated he will.

143. On January 16, 2025, the Chief emailed Plaintiff Garbarino and advised that he decided to officially proceed with terminating Officer Rankin, and that the charges are serious and there will be no negotiations to lessen any charges.

144. Then, Defendant Altaheri took a number of police officers to a strip club, and drove drunk on the way home, with other officers in the vehicle with him.

145. Officer Rankin was also in the car and blackmailed Defendant Altaheri into not firing him, as he had a video of Defendant Altaheri driving drunk and running red lights with the police lights on.

146. Defendant Altaheri once responded to an active-shooting scene while operating a City police vehicle. Defendant Altaheri struck a curb or other roadway hazard, disabling a tire on the patrol unit. Rather than notify dispatch, he telephoned two reserve officers and directed them to the scene to replace the tire. It was clear to both officers that Defendant Altaheri was drunk.

147. Plaintiff Garbarino reported the drunk driving and blackmail issues to Defendant Mayor Ghalib and human resources.

148. In another instance, Defendant Altaheri punched an unknown male in the head at a hookah lounge in Dearborn.

Unlawful Retaliation

149. Shortly after the Defendant Altaheri suspension, public backlash ensued, primarily from members of the Yemeni-American community who supported Defendant Altaheri, an Arab American.

150. The May 27, 2025, meeting was led by Defendant Mayor Amer Ghalib and joined by Defendants Abu Musa, Khalil Refai, Mohammed Hassan, Muhith Mahmood, Mohammed Alsomiri, and Muhtasin Sadman. Defendants unanimously voted to place Plaintiff on indefinite paid administrative leave.

151. Plaintiff's Garbarino access to all City property, devices, and systems was immediately revoked.

152. Defendant Mayor Ghalib improperly entered this meeting and attempted to prevent Plaintiff Garbarino from placing Defendant Altaheri on leave.

153. Defendant Mayor Ghalib announced in the meeting that Plaintiff Garbarino will be fired for suspending Defendant Altaheri.

Violation of Open Meetings Act

154. Defendants improperly ended the meeting and went into a closed session where they then decided to place Plaintiff Garbarino on leave, and then restarted the meeting.

155. Plaintiff Garbarino was outright told that he cannot participate in the closed session.

156. MCL 15.268(1)(a) only allows a closed session to consider disciplinary actions if the named person requests a closed session. Plaintiff Garbarino did not request a closed session and thus, any discussions and deliberations should have taken place in open session.

Racial Discrimination Retaliation

157. Plaintiff Garbarino raised concerns of ethnic bias against him and made the following statement just hours prior to the May 27, 2025 meeting: "some of you have intimated that the chief's ethnic background should play some kind of role in my personnel decisions. I will not, however, look the other way merely because someone is from a certain group or ethnic background. I feel that my refusal to do so here has led to discrimination directed at me because of my ethnic background."

158. Plaintiff Garbarino continued and stated that "I am entitled to legal protection from such discrimination and I expect that you all, as my employers, will act in accordance with anti-discrimination laws prohibiting you from taking my race and ethnicity as a consideration in your treatment of my employment."

Breach of Contract

159. Section 8(A) of Plaintiff's employment contract provides that the City may remove Employee from the City Manager position only in accordance with Charter and law.

160. Section 8(d) provides that:

> "any termination of this contract or separation of Employee's employment with the City, the Employee shall immediately be considered "Retired" with full Municipal Employees Retirement Systems benefits entitled. Retired shall mean, Employee is entitled to immediate and full MERS retirement benefits in accordance with the amount of years of service earned, but not less than twenty five service years, which will accelerate to twenty-five if not earned at termination. Employee shall be entitled to immediately begin to collect full retirement benefits regardless of age and be considered retired for all other official purposes associated with the City of Hamtramck."

161. Plaintiff Garbarino's placement on administrative leave and removal of all job duties and responsibilities constitutes a "separation" under the clear and unambiguous terms of Section 8(d) of his employment contract.

162. Despite this separation triggering immediate retirement under Section 8(d), Defendant City of Hamtramck has refused and failed to provide Plaintiff with the contractually mandated full Municipal Employees Retirement Systems benefits.

163. Plaintiff Garbarino is entitled to the full Municipal Employees Systems benefits as outlined in Section 8(A-D).

Plaintiff Adamczyk Report of Harassment Against Defendant Altaheri

164. On May 20, 2025, Plaintiff Adamczyk sent an email to Detective Ryan Strohauer, Detective John Daugherty (also Union Officer), and Marshana Burton, Director of Human Resources, where he detailed verbal and physical harassment directed towards him by Defendant Altaheri. **Exhibit 8**

165. On May 2, 2025, the Chief spoke in a hostile and intimidating manner during a meeting attended by City Administration, the City Attorney, City Clerk, Deputy Chief, and Sgt.

George, referring to Plaintiff Adamczyk as a "4-year wonder." The confrontation centered around disputes related to election fraud and the Chief's deteriorating relationship with city management. Immediately after, the Chief was heard screaming at the City Manager in the hallway, loud enough to be heard through the third-floor offices.

166. Plaintiff Adamczyk called the Chief after the May 2, 2025 meeting to address his hostile treatment. The Chief repeatedly referenced "You and Max," tying Plaintiff to the City Manager and expressing anger over election-related disputes.

167. During the call, Defendant threatened to fire Plaintiff if he approved Garbarino's MCOLES certification before the Defendant received a raise.

168. Plaintiff Adamczyk reported the inappropriate directive and expressed discomfort. Defendant Altaheri responded aggressively and abruptly ended the call by hanging up.

169. On May 15, 2025, Plaintiff Adamczyk and Defendant Altaheri scheduled a meeting for May 20, 2025.

170. On May 15, 2025, as Plaintiff Adamczyk and Detective Strohauer arrived at the station, Defendant Altaheri stood outside with a grim expression, having observed their arrival. As they approached, he ordered Plaintiff Adamczyk into the building in a hostile and derogatory tone without justification.

171. On May 20, 2025, the meeting previously scheduled by Defendant Altaheri took place in Sgt. George's office. Present were Defendant Altaheri, Deputy Chief Mileski, Sgt. George, Detective Strohauer, Detective Daugherty, Investigator Budnick, and Plaintiff Adamczyk.

172. Upon approaching the room, Defendant Altaheri directed Plaintiff Adamczyk and Investigator Budnick, using a harsh and negative tone, to sit together on a small couch, a tone and treatment not directed at any other attendees.

173. Defendant Altaheri then abruptly instructed command staff to "Get the Sheriff from downstairs," despite no sheriff personnel being present in the building. He claimed to have spoken with the Sheriff's office the day before regarding the fraud investigation position and immediately ordered Plaintiff Adamczyk to retrieve their equipment, escorted by Internal Affairs Sgt. Golla and Detective Strohauer.

174. Though no disciplinary incident had occurred to justify such action, Plaintiff Adamczyk complied

175. Upon returning, Defendant Altaheri conducted the meeting in an aggressive and unprofessional manner, at one point pounding his fist on the desk next to Plaintiff Adamczyk, contradicting the collaborative tone he had promised in prior written communications.

176. Plaintiff Adamczyk's email details violations of Hamtramck Police Department's Rules and Regulations, including but not limited to, harassment, ridicule, making offensive comments, engaging in bullying or intimidating acts, aggressive or hostile behavior, verbal abuse, failing his supervisor responsibilities, retaliation, and failure to respect subordinate ranked personal.

Defendant Altaheri's Misuse of Authority in Personal Matter

177. In March, 2025, Defendant Altaheri directed Plaintiff Adamczyk to assist two of his business associates, Adam Kobzan and Jennie Tufano, both from New York, in investigating a local Yemeni resident, Omar Alhalmi, who was alleged to have defrauded his associate in New York in an amount exceeding $150,000.

178. Plaintiff Adamczyk conducted a preliminary review and discovered that the subject had previously been investigated by the FBI in 2019 for wire fraud involving approximately $88 million.

179. Defendant Altaheri instructed Plaintiff Adamczyk to use his special deputy privileges to conduct investigative activities outside the City of Hamtramck.

180. On April 16, 2025, Plaintiff Adamczyk expressed concerns after reviewing the matter, a conflict due to Defendant potential personal bias underlying the request. He consulted with outside agencies and ultimately advised Defendant Altaheri that the investigation raised several troubling issues and that it would be inappropriate for him to proceed.

181. In response, Defendant Altaheri, using a hostile and harassing tone, told Plaintiff Adamczyk, “You are not a team player,” and ordered him out of his office.

Defendant Mayor Ghalib’s False Statements against Plaintiffs

182. Following the May 27, 2025, meeting placing Plaintiff Garbarino on paid leave, the Defendant Hamtramck Mayor Ghalib made blatantly false statements against both Plaintiffs.

183. Specifically, Defendant Mayor advised that there needs to be an investigation into an officer he said was being paid by the city for overtime done by Wayne County despite not showing up to work.

184. Defendant Mayor stated that “He did not show up even one time for the past seven months," and " we are paying him for the overtime. ... He never showed up to his job and he was getting paid by Hamtramck. ... This is a serious allegation, a crime.”

185. Defendant Mayor at first did not name the officer, but later during the meeting he told Plaintiff Garbarino that he “impeded on an ongoing investigation into Dave,” referring to Plaintiff David Adamczyk.

186. Defendant Mayor also accused Plaintiff Gabarino of not communicating with him and the council before he removed Defendant Altaheri, claiming that Plaintiff Gabarino was “trying to shift the spotlight onto the chief instead of a corrupt office.”

187. Defendant Mayor's comments were published on May 28, 2025 in the Detroit Free Press.[2]

188. Defendant's Mayors statements against both Plaintiffs were derogatory, humiliating, offense, and untrue.

Serious Negative Effects on Plaintiffs

189. As a result of Defendants' actions, Plaintiffs Garbarino and Adamczyk and has suffered and will continue to suffer harm, including but not limited to:

a. Suspension of Employment;

b. Constructive Discharge;

c. Stress;

d. Humiliation;

e. Embarrassment;

f. Outrage;

g. Mental anguish;

h. Emotional Damages;

i. Economic damages;

j. Non-economic Damages;

k. Exemplary damages

l. Other damages to be discovered through the course of litigation.

190. Specifically, Plaintiffs Garbarino dedicated more than two decades of his life to faithfully serving the City of Hamtramck, just to be publicly humiliated for doing the right thing.

[2] Hamtramck City Council places city manager on administrative leave

191. Defendant City of Hamtramck has been plagued by internal dysfunction and ongoing misconduct, as outlined in this Complaint.

192. Plaintiff Garbarino now suffers chronic stomach pain and sleep issues, both for which he has treated for and are both directly related to the stress of this situation.

193. Plaintiff Garbarino is now preparing to undergo therapy to manage the psychological damage caused by this public betrayal and public and private humiliation.

194. Plaintiff Adamczyk suffers from stomach pain, headaches, sleep issues, and stress.

195. Plaintiff Adamczyk is preparing to undergo therapy to manage the psychological damage caused by this public betrayal and humiliation.

196. Defendants' actions disrupted Plaintiff's personal life and isolating him from the community he once proudly served.

CAUSES OF ACTION

COUNT I - WRONGFUL DISCHARGE IN VIOLATION OF PUBLIC POLICY (PUBLIC POLICY TORT)

(As To all Defendants)

197. Plaintiffs, by reference, incorporates the preceding paragraphs as though fully set forth herein.

198. Plaintiffs were suspended from their employment in retaliation for refusing to violate the law, for reporting unlawful and unethical conduct, and for upholding their duties under the City Charter, state law, and other governing authority.

199. For example, Plaintiffs refused to violate policies, including but not limited to:

Under Hamtramck City Charter, Section 9-18, the first two duties listed for city manager are:

> (a) Powers and duties. The city manager shall be the chief administrative officer of the City. He shall be responsible to the council and mayor for the administration of all

city affairs placed in his charge by this charter. He shall have the following powers and duties:

(1) He shall appoint and, when he deems it necessary for the good of the City, suspend or remove all city employees and department heads provided for in this charter or by ordinance, except as otherwise provided by law. He may authorize any person appointed by him who is subject to his direction and supervision to exercise these powers with respect to subordinates in that officer's department, office, or agency.

(2) He shall be responsible for the efficient administration of all departments of the city government, control and supervise the department heads of the city government that he appoints and their subordinates, and see that all such officers of the city faithfully comply with and discharge their official duties, except as otherwise provided by this charter or state law.

In addition, Section 5-01(g) of the Charter provides that "All department heads shall be subject to the administration and under the jurisdiction of the city manager" while section 7.03 provides that, "Except for the purpose of inquiry, the council and each of its members shall deal with the administrative branch of the government solely through the city manager, and neither the council nor any members shall give any order or directions, written or verbal, either publicly or privately, to any of the subordinates of the city manager."

Hamtramck City Charter, Section 5-01(g): "All department heads shall be subject to the administration and under the jurisdiction of the city manager."

Hamtramck City Charter, Section 7.03: "Except for the purpose of inquiry, the council and each of its members shall deal with the administrative branch of the government solely through the city manager, and neither the council nor any members shall give any order or directions, written or verbal, either publicly or privately, to any of the subordinates of the city manager."

General Public Policy of the State of Michigan: It is a well-established public policy that public officials must act in the interest of integrity, transparency, and public safety.

Michigan Whistleblowers' Protection Act, MCL 15.361 et seq.: Protects employees who report or are about to report violations of law or regulation to a public body from retaliatory employment actions.

Michigan Freedom of Information Act (FOIA), MCL 15.231 et seq.: Establishes the public's right to access public records and prohibits improper denial or obstruction of such access.

Michigan Open Meetings Act (OMA), MCL 15.261 et seq.: Requires public bodies to deliberate and make decisions in meetings open to the public, subject to narrow exceptions.

Michigan Compiled Laws § 750.117: Any person who corruptly gives, offers, or promises any gift, gratuity, money, property, or other valuable thing to a public officer with the intent to influence their official actions is guilty of a felony.

Michigan Compiled Laws § 750.357: A person who commits larceny by stealing from the person of another is guilty of a felony, punishable by imprisonment for up to 10 years.

Michigan Compiled Laws § 750.159g: Defines "racketeering" as committing, attempting to commit, conspiring to commit, or aiding or abetting certain offenses for financial gain.

Michigan Compiled Laws § 750.478a: Prohibits attempting to intimidate, hinder, or obstruct a public officer or employee in the discharge of their official duties.

Michigan Compiled Laws § 750.157a: Any person who conspires with one or more persons to commit an offense prohibited by law, or to commit a legal act in an illegal manner, is guilty of conspiracy.

Michigan Compiled Laws § 750.422: Any person lawfully required to depose the truth in any proceeding in a court of justice who commits perjury is guilty of a felony.

Michigan Compiled Laws § 750.174: Outlines penalties for embezzlement based on the value of money or property embezzled, ranging from misdemeanors to felonies.

Michigan Compiled Laws § 750.505: Addresses common law offenses not otherwise specified by statute, including misconduct in office by public officers.

Michigan Compiled Laws § 750.248: Any person who falsely makes, alters, forges, or counterfeits any public record or other instrument with intent to injure or defraud any person is guilty of a felony.

Michigan Compiled Laws § 168.932: A person shall not conceal, withhold, or destroy a ballot box or voting machine, or fraudulently or forcibly add to or diminish the number of ballots legally deposited.

Michigan Compiled Laws § 169.257: A person shall not make a contribution or expenditure in violation of this act.

Michigan Compiled Laws § 750.490a: An officer or employee of any governmental agency shall not purchase or cause to be purchased any goods, wares, or merchandise in the name of or on the credit of the governmental agency for any purpose other than for use or resale in the regular course of the official business of the governmental agency.

Michigan Compiled Laws § 750.483a: A person shall not destroy, alter, conceal, or remove any record, document, or thing with the intent to impair its availability for use in an official proceeding.

Michigan Compiled Laws § MCL 750.122: A person shall not willfully use intimidation to influence a witness's testimony or to prevent the witness from testifying

Michigan Compiled Laws § MCL 28.295: A person who intentionally reproduces, alters, counterfeits, forges, or duplicates an official state personal identification card... is guilty of a felony

Michigan Compiled Laws § MCL 257.625: "A person... shall not operate a vehicle upon a highway or other place open to the general public... if the person is operating while intoxicated.

Michigan Compiled Laws § MCL 168.931: Prohibits a person employed by or associated with any enterprise engaged in interstate commerce from conducting or participating in the conduct of the enterprise's affairs through a pattern of racketeering activity

18 U.S.C. § 241: Criminalizes any conspiracy to injure, oppress, threaten, or intimidate any person in the free exercise or enjoyment of rights secured by the Constitution or U.S. law.

18 U.S.C. § 242: Prohibits any person acting under color of law from willfully depriving another of rights protected by the Constitution or federal law.

18 U.S.C. § 1512: Prohibits tampering with a witness, victim, or informant by means of intimidation, threats, corrupt persuasion, or harassment to influence or prevent testimony or cooperation.

18 U.S.C. § 1503: Penalizes efforts to corruptly influence or obstruct the due administration of justice, including interference with judicial officers or jurors.

18 U.S.C. § 666: Makes it a crime for agents of local governments that receive federal funds to embezzle, steal, obtain by fraud, or accept bribes in connection with those funds.

18 U.S.C. § 1346: Expands the definition of mail and wire fraud to include schemes to deprive another of the intangible right of honest services, commonly used in public corruption cases.

18 U.S.C. § 1951: Criminalizes actual or attempted robbery or extortion affecting interstate or foreign commerce, including the use of public office to extort.

18 U.S.C. § 1952: Criminalizes travel in interstate commerce with intent to promote or carry on unlawful activity, including bribery and extortion.

18 U.S.C. § 1961: Provides for criminal and civil liability for persons engaged in a pattern of racketeering activity, including bribery, obstruction, and witness tampering.

42 U.S.C. § 1983: Provides a civil cause of action against any person acting under color of law who violates another's constitutional or federally protected rights.

42 U.S.C. § 1985(3): Prohibits conspiracies to deprive persons or classes of persons of equal protection or equal privileges and immunities under the laws.

42 U.S.C. § 1986: Imposes liability on any person who has knowledge of a §1985 conspiracy and the power to prevent it, but neglects or refuses to do so.

200. Plaintiff Adamczyk in seeing what he believed to be corrupt, illegal, and unethical behavior, refused to violate the law and policies, made Plaintiff Garbarino, the Michigan State Police, Human Resources, the FBI, among others, aware of Defendants' actions.

201. Plaintiff Garbarino, in also seeing what he believed to be corrupt, illegal, and unethical behavior, refused to violate the law and policies, and placed Police Chief on paid administrative leave.

202. Adverse employment actions were taken against Plaintiffs for these actions, including creating a hostile work environment and both Plaintiffs being put on paid administrative leave.

203. Plaintiff Garbarino's discipline was carried out in retaliation for placing the Police Chief on paid administrative leave.

204. Plaintiff Adamczyk discipline was carried out in retaliation for making the serious allegations against Defendant known to Plaintiff Garbarino, the Michigan State Police, and others.

205. Plaintiffs' discipline violates clearly established public policy of the State of Michigan that an employer may not adversely alter an employee's employment when the reason for paid administrative leave was the disclosure of the violation of the law or a refusal to violate the law.

206. As a direct and proximate result of the violation of Plaintiffs' rights, Plaintiffs have suffered irreparable injuries and damages including but not limited to loss of earnings and earning capacity, past and future lost earnings, mental and emotional distress, embarrassment, humiliation, anxiety about the future, loss of ordinary pleasures of everyday life, and all other damages to be discovered through the course of litigation.

COUNT II - VIOLATION OF THE WHISTLEBLOWERS' PROTECTION ACT - RETALIATION

(As To all Defendants)

207. Plaintiffs, by reference, incorporates the preceding paragraphs as though fully set forth herein.

208. Plaintiffs reported and/or were going to report, and investigated numerous serious concerns regarding members of Defendant City of Hamtramck, including the Police Chief and the Defendant councilman, to the police department, the Attorney Generals Office, to the City Attorney, and to the FBI.

209. Defendants were aware that Plaintiffs were reporting and investigating suspected violations of law to a public body.

210. Defendants' actions in retaliating conduct of against Plaintiff Garbarino, including but not limited to, creating a hostile environment and placing him on paid administrative leave, were intentional and in disregard for the Plaintiff's constitutional protected rights.

211. Defendants' actions in retaliating conduct of against Plaintiff Adamczyk, including but not limited to, creating a hostile environment and harassing him to the point where an administrative leave would be the safest option for him, were intentional and in disregard for the Plaintiff's constitutional protected rights.

212. The retaliatory conduct of Defendants and its agents is a violation of Michigan Whistleblowers Act, Mich. Comp Laws 15.362, Mich State Ann 17.428(3)

213. As a direct and proximate result of the violation of Plaintiffs' rights, Plaintiffs have suffered irreparable injuries and damages including but not limited to loss of earnings and earning capacity, past and future lost earnings, mental and emotional distress, embarrassment, humiliation, anxiety about the future, loss of ordinary pleasures of everyday life, and all other damages to be discovered through the course of litigation.

COUNT III: VIOLATION OF MICHIGAN'S ELLIOTT-LARSEN CIVIL RIGHTS ACT

(Retaliation)

214. Plaintiffs, by reference, incorporate the preceding paragraphs as though fully set forth herein.

215. Defendants retaliated against Plaintiff Garbarino for reporting unlawful conduct, placing the Police Chief on paid administrative leave, and refusing to participate in misconduct which is a protected activities under ELCRA.

216. Defendants retaliated against Plaintiff Adamczyk for reporting unlawful conduct and refusing to participate in misconduct, both of which constitute protected activity under ELCRA.

217. Defendants retaliation were also racially motivated as Plaintiffs were subjected to disparate treatment by Defendants on the basis of their race and national origin.

218. Specifically, Plaintiffs were suspended and otherwise retaliated against because they are white and non-Yemeni, while individuals of Yemeni descent were not subjected to the same scrutiny or adverse action, despite the numerous disturbing acts outlined in this Complaint

219. Defendants' actions constitute unlawful discrimination in violation of the Elliott-Larsen Civil Rights Act, MCL 37.2101 et seq.

220. In response to Plaintiff's participation in these protected activities, Plaintiff was punished without justification by Defendants including, but not limited to, creating a hostile work environment and Defendants placing Plaintiff Garbarino on paid administrative leave, among others to be discovered through the course of litigation.

221. Defendants' actions were willful, intentional, and/or made in reckless disregard of Plaintiff's rights and sensibilities.

222. As a direct and proximate result of the violation of Plaintiffs' rights, Plaintiffs have suffered irreparable injuries and damages including but not limited to loss of earnings and earning capacity, past and future lost earnings, mental and emotional distress, embarrassment, humiliation, anxiety about the future, loss of ordinary pleasures of everyday life, and all other damages to be discovered through the course of litigation.

COUNT IV: VIOLATION OF OPEN MEETINGS ACT

223. Plaintiffs, by reference, incorporates the preceding paragraphs as though fully set forth herein.

224. On May 27, 2025, the Defendants held a closed session during a regularly scheduled council meeting, during which they deliberated and reached consensus regarding the suspension of Plaintiff Garbarino. The Council then emerged from the closed session and voted unanimously to place Plaintiff Garbarino on administrative leave.

225. This action constitutes a direct violation of the Michigan Open Meetings Act (OMA), MCL 15.261 et seq., which mandates that all decisions of a public body must be made at a meeting open to the public unless the subject matter falls squarely within one of the narrow

statutory exceptions. The decision to suspend Plaintiff Garbarino does not meet any valid exception under the Act, particularly where Plaintiff did not request the close meeting himself.

226. MCL 15.268(1)(a) only allows a closed session to consider disciplinary actions if the named person requests a closed session.

227. Plaintiff Garbarino did not request a closed session and thus, any discussions and deliberations should have taken place in open session and thus, Defendant's action was a clear violation of MCL 15.263(1), which states that "all decisions of a public body shall be made at a meeting open to the public," and MCL 15.268, which strictly limits the grounds upon which a closed session may be held.

228. As a direct and proximate result of the violation of Plaintiffs' Garbarino rights, Plaintiff Garbarino has suffered irreparable injuries and damages including but not limited to loss of earnings and earning capacity, past and future lost earnings, mental and emotional distress, embarrassment, humiliation, anxiety about the future, loss of ordinary pleasures of everyday life, and all other damages to be discovered through the course of litigation.

COUNT V: RETALIATION BASED ON ASSOCIATION IN VIOLATION OF PUBLIC POLICY AND THE WHISTLEBLOWERS' PROTECTION ACT

229. Plaintiffs, by reference, incorporates the preceding paragraphs as though fully set forth herein.

230. Plaintiff Adamczyk was subjected to adverse treatment, including verbal harassment, intimidation, professional isolation, and internal scrutiny based on his known association with Plaintiff Garbarino.

231. Defendant Altaheri repeatedly referenced Plaintiff Adamczyk's personal and professional relationship with Plaintiff Garbarino in a negative and retaliatory manner, including in public settings and before city administration.

232. The retaliation against Plaintiff Adamczyk escalated directly in proportion to the increased scrutiny on Defendant Altaheri and others stemming from investigations initiated or supported by Plaintiff Garbarino.

233. This conduct violates the Michigan Whistleblowers' Protection Act, MCL 15.361 et seq., which prohibits retaliation against employees who are associated with, support, or aid individuals engaged in protected activity.

234. Retaliating against Plaintiff Adamczyk based on his known affiliation with another whistleblower violates the public policy of the State of Michigan, which safeguards individuals who assist or associate with whistleblowers from adverse employment actions.

235. As a direct and proximate result of the unlawful retaliation, Plaintiff Adamczyk has suffered reputational harm, emotional distress, workplace hostility, and other damages

COUNT VI: DEFAMATION AGAINST MAYOR AMER GHALIB

236. Plaintiffs, by reference, incorporates the preceding paragraphs as though fully set forth herein.

237. The accusations set forth by Defendant Mayor Ghalib, including all of the statements in paragraph 155-161 of this Complaint are false.

238. Specifically, Defendant Mayor false statements that Defendant Altaheri "did not show up even one time for the past seven months," and " we are paying him for the overtime. ... He never showed up to his job and he was getting paid by Hamtramck. ... This is a serious allegation, a crime."

239. Also, Defendant's Mayor false statements accusing Plaintiff Gabarino of not communicating with him and the council before he removed Defendant Altaheri, claiming that Plaintiff Gabarino was "trying to shift the spotlight onto the chief instead of a corrupt office."

240. Defendants published the remarks to third parties with knowledge of the falsity of the statements, or in reckless disregard of their truth or falsity, or in a negligent manner.

241. The publication was not privileged

242. The publication of these remarks has resulted in damage to Plaintiff's reputation in the community and economic loss, including but not limited to the following:

a. Emotional distress;

b. Humiliation, mortification, embarrassment;

c. Sleeplessness and anxiety;

d. Loss of income, customers, and business reputation;

e. Other damages they may arise during the course of discovery and the course of this trial

243. Defendant's accusations constitute defamation per se

COUNT VII: BREACH OF CONTRACT

244. Plaintiffs, by reference, incorporates the preceding paragraphs as though fully set forth herein.

245. Plaintiff Max Garbarino entered into a valid and enforceable employment agreement with Defendant City of Hamtramck, which governed the terms and conditions of his employment as City Manager.

246. Under Michigan law, a claim for breach of contract requires: (1) the existence of a valid contract; (2) a breach of the contract; and (3) damages resulting from the breach. *Miller-Davis Co v Ahrens Constr, Inc*, 495 Mich 161, 178 (2014).

247. Section 8(A) of the contract provides that the City may remove Plaintiff from the City Manager position only in accordance with the City Charter and applicable law.

248. Section 8(D) of the contract expressly provides that in the event of any termination or separation of Plaintiff's employment, he shall immediately be considered "Retired" with full Municipal Employees Retirement Systems (MERS) benefits, including the right to collect full retirement benefits immediately, regardless of age, and be treated as retired for all official purposes associated with the City.

249. On May 27, 2025, Defendant City of Hamtramck placed Plaintiff Garbarino on indefinite paid administrative leave, revoked his access to all City systems, devices, and property, and stripped him of all job duties and responsibilities.

250. Under the clear and unambiguous language of Section 8(D), these actions constitute a "separation" from employment sufficient to trigger Plaintiff's immediate right to be designated as "Retired" and to receive full MERS benefits.

251. Defendant City of Hamtramck has refused and failed to provide Plaintiff with the retirement benefits expressly guaranteed to him under the contract, including but not limited to formal designation as retired and access to immediate, full MERS benefits.

252. Defendant's conduct constitutes a material breach of contract under Michigan law.

253. Plaintiff has fully performed all conditions precedent under the agreement and has otherwise fulfilled his obligations as City Manager.

254. As a direct and proximate result of Defendant's breach, Plaintiff has suffered damages including but not limited to the loss of retirement benefits, economic harm, and other contractually protected rights.

WHEREFORE, Plaintiffs Max Garbarino and David Adamczyk respectfully requests this Honorable Court enter a judgment against Defendants in such an amount as the trier of fact shall

deem fair and just, together with interest, costs, and attorney fees, and for such other and further relief as this Honorable Court may deem appropriate in equity, fairness, and good conscience.

Respectfully submitted,

Reno R Arabo

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Detroit, MI 48226
(313) 777-7529 /
jon@markolaw.com

Dated: June 3, 2025

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2025, I presented the foregoing paper to this Court's MI-File which will send notification of such filing to the above listed attorneys of record.

/s/ Erin R Carpenter

EXHIBIT 1

From: Max Garbarino
Sent: Wednesday, March 12, 2025 10:16 PM
To: nesseld34@michigan.gov
Cc: Odey K. Meroueh <okm@mhatlaw.com>
Subject: Alleged Election Fraud, Ballet Harvesting, Election Interference, and Residency

Dear Attorney General Nessel,

I am writing to you today to request your urgent intervention into the long-standing and severe election integrity and related harassment issues within the City of Hamtramck. For over a decade we have endured election fraud, intimidation, and threats which have including threats of termination of employment directed at city department heads and other employees for raising attention to such.

Throughout the years when allegations have been made I have sought assistance in my various roles as City Manager and Chief of Police through proper channels of authority. My predecessors in these positions have also requested help, as has our current City Clerk and her predecessors as well from the FBI, Michigan Attorney General's Office, and Michigan State Police over the years. Unfortunately our appeals have often resulted in little to no effective assistance. Those who reported and believed that someone, somewhere in a position of authority would do something about the conduct became so disheartened that most gave up trying.

Only recently within the past year has your office provided a dedicated investigator and team giving the matter it the attention and seriousness this situation demands, for which you have our commendations and gratitude. We know this investigation yielded substantial and compelling evidence of intentional wrongdoing because we observed the comings and goings of the investigation team, heard the whispers within the community, and have witnessed the buzz produced by the diligent efforts of your team. People are talking, the local news is reporting on it, and we even know who has been coming forward, and we again have hope. If we do not get committed assistance to address the mountain of intentional and deceitful actions that at this point everybody seems to know about, all anyone will talk about and remember is that once again we were let down by State authorities. On the other side of the coin, the offending parties will only be more confident with their fraud, because they'll know they are for some reason immune to the objectives of our Attorney General.

We already have a councilman who boasted during a council meeting that he has been investigated eight times, and "they haven't gotten me." During another council meeting a councilmen introduced a resolution for the sole purpose of addressing allegations of ballot harvesting and lack of residency, resulting in full public discussion and quite frankly, mockery of your office's investigation. The residency issue aside (which is another elephant as it seems several have simply disregarded the requirement that a councilmember reside in the City of Hamtramck - with one even apparently living in Troy) the election fraud in this City is catastrophic and has reached a point that would defy belief if it wasn't so out in the open. We have another significant election rapidly approaching. Without your immediate and decisive action from your office, the abuses of the election process in this City will only intensify.

As I have heard you say , "(e)lection integrity matters, and we must take these violations very seriously in order to ensure that we can trust the results on the other end." We here in Hamtramck wholeheartedly agree. We urgently ask for your assistance in thoroughly following through with the prosecution and finally addressing this deeply rooted corruption and in doing so ensuring accountability and restoring integrity to Hamtramck's elections.

Thank you for your immediate attention to this critical matter. We stand ready to assist your office in every possible way to resolve this ongoing crisis.

Respectfully,

Max Garbarino J.D.

City Manager, City of Hamtramck

3401 Evaline Street, Hamtramck, MI 48212

(313) 800-5233;327 (D) (313) 721-1494 (C)

mgarbarino@hamtramckcity.gov

https://link.edgepilot.com/s/7dd56934/Dlg024QLDU6NE13YPG5SFA?u=http://www.hamtramck.us/

https://link.edgepilot.com/s/fb166605/gs7eyBnTk0aiFwqXJk9WMQ?u=https://www.facebook.com/CityofHamtramck/

https://link.edgepilot.com/s/5cf979d9/OGYCftP2mEyQvtrg02jLoA?u=https://www.facebook.com/Hamtramck-Police-Dept-402164266466125/

EXHIBIT 2

CITY OF HAMTRAMCK

Rana Faraj
City Clerk

March 12, 2025

Honorable Dana Nessel
Attorney General
State of Michigan
P.O. Box 30212
Lansing, MI 48909
nesseld34@michigan.gov

To Whom It May Concern,

I'm writing to formally express my frustration and deep concern about the ongoing election integrity issues here in Hamtramck, specifically involving a current City Council member who has repeatedly been accused of election fraud. Despite numerous reports and evidence, and forwarding this issue to the county, state, and even law enforcement, including Michigan State Police and the Attorney General's Office, nothing significant has been done to hold this person accountable.

I have now received reports that the investigator assigned to this matter by the Attorney General's Office has been removed from the investigation, not because he has failed to uncover evidence of criminal activity, but precisely because he has. The members of this office and other city employees that gave interviews and cooperation are left to wonder whether it was all a waste of our small city's very scarce resources to offer such cooperation.

As you know, Michigan voters supported the 2022 ballot proposal designed to enhance election security, including the use of cameras at absentee ballot drop boxes. Those cameras have done exactly what they were intended to do: they've captured clear evidence of suspicious activities, like multiple instances of large batches of absentee ballots being dropped into boxes at once, strongly suggesting a single individual rather than multiple legitimate voters. These incidents were properly documented and turned over to the authorities. Yet, this council member continues to act as though he's above the law, openly bragging that no one can touch him.

Another city election is approaching this year for three City Council seats and the mayor's position, and rumors have already surfaced that this council member is bringing onboard direct family members to run for these positions. I have repeatedly sought help from the state during previous suspicions of his fraudulent activities, but no meaningful

action was ever taken. Now, despite having collected extensive evidence, we continue to face silence and inaction.

This individual has a long, documented history of obstructing the election process, intimidating election workers, and openly ignoring procedures for his own benefit. Throughout the 2023 City Council election, he consistently undermined my office's efforts to carry out a fair election. He has even personally threatened me before every election, claiming he'll continue winning elections and escaping any consequences regardless of the evidence against him.

The blatant double standard here is infuriating. If I, as City Clerk, deviated even slightly from election procedures, I'd immediately face investigation and prosecution. Yet, someone who brazenly breaks the law sees no repercussions. If election integrity matters at all, enforcement needs to be consistent and fair.

Our voters in Hamtramck deserve elections that are fair, transparent, and free from manipulation and intimidation. Continued inaction by authorities responsible for enforcing these laws sends a dangerous message that election fraud is acceptable here and that certain individuals are above accountability.

I strongly urge your offices to take action. Continued inaction further damages public trust in our elections. The residents of Hamtramck deserve leaders who prioritize the public good over personal gain. The people and the press are watching.

If you require additional information or cooperation from my office, I'm fully prepared to assist.

Thank you for your attention to this matter. I look forward to your response and to seeing accountability finally enforced.

Respectfully,



Rana Faraj
City Clerk, City of Hamtramck

cc:
Cathy M Garrett: cgarrett@waynecountymi.gov
Gregory Mahar: gmahar@waynecountymi.gov
Jennifer Redmond: jredmond@waynecountymi.gov
Jonathan Brater: (MDOS) BraterJ@michigan.gov
Lori Bourbonais: (MDOS) Bourbonaisl@michigan.gov
Max Garbarino: mgarbarion@hamtramckcity.gov
Odey K. Meroueh: okm@mhatlaw.com
Zachary Hallman: zhallman@mhatlaw.com

EXHIBIT 3

Advantage Investigations

24 April 2025

Rana Faraj
City Clerk
City of Hamtramck
3401 Evaline Street
Hamtramck, MI 48212

Re: Investigation of City Council candidate – Abu Amed Musa

Ms. Faraj,

Through the course of our investigation, we found the following discrepancie(s) for Abu Amed Musa:

We found Abu Amed Musa to currently reside at [redacted]., Warren, MI, which conflicts with the address he reported on the filing affidavit of [redacted], Hamtramck, MI, 48312.
The residential address of 28045 Kingswood Ct., Warren, was developed through investigative database and other public records and was verified by surveillance as well as by neighborhood canvass.

Please feel free to contact me directly with any questions you may have.

Sincerely,

Jeff Dickison
President
Advantage Investigations and Research, LLC
586.298.2748
[redacted] mobile

Advantage Investigations

24 April 2025

Rana Faraj
City Clerk
City of Hamtramck
3401 Evaline Street
Hamtramck, MI 48212

Re: Investigation of City Council candidate – Muhith Mahmood

Ms. Faraj,

Through the course of our investigation, we found the following discrepancies for Muhith Mahmood:

We found Muhith Mahmood to currently reside at 5555 Patterson, Troy, MI, which conflicts with the address he reported on the filing affidavit of 3119 Holbrook Street, Hamtramck, MI, 48312.
The residential address of 5555 Patterson, Troy, was developed through investigative database and other public records and was verified by surveillance as well as by neighborhood canvass.

Additionally, we found an active federal tax lien on file at Oakland County Register of Deeds from in the amount of $32,575.50

Please feel free to contact me directly with any questions you may have.

Sincerely,

Jeff Dickison
President
Advantage Investigations and Research, LLC
586.298.2748
mobile

EXHIBIT 4

Outlook

---------- Forwarded message ---------
From: **Max Garbarino** <mgarbarino@hamtramckcity.gov>
Date: Mon, May 5, 2025 at 2:06 PM
Subject: Formal Request for Assistance
To: miag@michigan.gov <miag@michigan.gov>, nessseld34@michigan.gov <nessseld34@michigan.gov>
Cc: Odey Meroueh <okm@mhatlaw.com>

Dear Attorney General Nessel:

I am writing to formally request that your office initiate a criminal investigation into serious allegations regarding residency fraud involving two current Hamtramck City Council members. These allegations arose from mandatory affidavits each candidate submitted as part of their applications for candidacy in the upcoming municipal election. The affidavits required candidates to certify their residency within Hamtramck, triggering a standard background check to verify these statements.

Upon review of investigative reports conducted pursuant to these background checks, substantial evidence has emerged indicating that these council members have falsely claimed residency within city limits, thereby potentially committing fraud upon the City of Hamtramck, insurance fraud, and other related criminal acts.

To thoroughly document these findings and ensure impartiality, I have also directed the Hamtramck Police Department to undertake an internal investigation. Their comprehensive report detailing these findings and supporting evidence will be forwarded to your office shortly.

Given the gravity and nature of these allegations, and the potential damage to public trust and municipal integrity, it is crucial that your office undertake an independent criminal investigation. Prompt intervention from your office will underscore the importance of transparency and uphold accountability in our local government.

Thank you in advance for your immediate attention to this matter. Should you require further information or clarification, please do not hesitate to contact me directly.

Respectfully,

Max Garbarino J.D.

City Manager, City of Hamtramck

3401 Evaline St., Hamtramck, MI, 48212

(313) 800-5233;327 (w), (313) 721-1494 (c)

mgarbarino@hamtramckcity.gov

https://link.edgepilot.com/s/a4ca4125/7DVIR9584EWIgKR4IeOI2Q?u=http://www.hamtramck.us/

https://link.edgepilot.com/s/4b598d53/Tofr4fwk8UO69mTAOc_g4g?u=https://www.facebook.com/CityofHamtramck/

https://link.edgepilot.com/s/86b4ecea/fYOEHjP_80Gwt8yhwNyxEw?u=https://www.facebook.com/Hamtramck-Police-Dept-402164266466125/



EXHIBIT 5

From: Max Garbarino
Sent: Tuesday, December 10, 2024 4:45 PM
To: Odey K. Meroueh <okm@mhatlaw.com>
Subject: Performance Review (Attorney Client Privilege)

Mr. Meroueh,

In addition to my request for closed session on the performance review, I'd also like to add that it appears this performance review is more about several Councilmen's personal agendas, rather than truly based upon performance. It's been brought to my attention that Councilmen Somiri is angry over the park improvements, as he believes it negatively effects his business, albeit he apparently accidently voted yes for it. He is mad in regards to lawful code violations he and his family have received for clear violations including some for safety on his commercial building. Further, he is apparently mad over the fact that I have positive relationships with the Imams in our city which I find completely counter intuitive of what this position should be and is dangerously encroaching on freedom of speech.

Councilmen Mahmood is clearly still upset over his candidate not being selected for the treasurer position after he apparently, with another Councilmen, promised it to them. As you know we followed a lawful procedure. I hear he is also mad over code enforcement, as according to code, he was caught doing construction twice over the summer without a permit. One time for windows and one time for concrete. In regards to Councilmen Hassan, I am seriously concerned that he is only on board with a review as he is trying to manipulate the other Councilmen to unseat Councilmen Musa from the Mayor Pro Tem position. In recent weeks we have all caught him in blatant lies. For example, telling me how happy he has been with my performance, promising a raise, then doing the exact opposite. Going as far as lying to everyone about everything to manipulate the system.

Last, I am very concerned with the fake email Councilmen Hassan sent for public comment alleging that Councilmen Musa doesn't reside in the city. As you know, I promptly turned the matter over to the police department for follow up. This allegation albeit specific to Musa, likely will call into question several of them dealing with residency. This will undoubtably be used against me, if not blatantly, for sure in their evaluations.

Please do your best to guide the process properly.

-

Max Garbarino J.D.

City Manager

City of Hamtramck

1st Floor , 3401 Evaline Street

Hamtramck, MI 48212

(313) 800-5233 extension 327 desk

(313) 721-1494 cell

Email: mgarbarino@hamtramckcity.gov

https://link.edgepilot.com/s/c861028f/CjzsIfq1ykmlsePhZSOrVQ?u=http://www.hamtramck.us/

https://link.edgepilot.com/s/c42ac18e/MRzNCn1OPkirna_Wh4F1ug?u=https://www.facebook.com/CityofHamtramck/

https://link.edgepilot.com/s/f1c5ba33/o5K0UsQImkazUfvErPtYeg?u=https://www.facebook.com/Hamtramck-Police-Dept-402164266466125/

EXHIBIT 6

From: David Adamczyk <dmadamczyk@gmail.com>
Sent: Saturday, May 3, 2025 7:20 PM
To: Max Garbarino <mgarbarino@hamtramckcity.gov>; Odey K. Meroueh <okm@mhatlaw.com>
Subject: Fwd: Concerns and Notice

The official complaint and referral has been made.

I also spoke with the supervisor of the public Integrity unit.

Sent from my iPhone

Begin forwarded message:

> **From:** David Adamczyk <dmadamczyk@gmail.com>
> **Date:** May 3, 2025 at 6:27:16 PM EDT
> **To:** mrsluss@fbi.gov
> **Subject: Fwd: Concerns and Notice**
>
> Matt,
>
> This email shall be the follow up to our phone call a couple months ago suspecting that may be file play with the chief.
>
> There is evidence now on multiple levels of concerning behavior, but most importantly handling off the record, stolen vehicles for friendships and personal gain, as well as improprieties with his potential financial gain, personally dealing with a direct contact of the president with trying to pay off a campaign to get a pardon on a convicted criminal out of New York. The most compelling and troubling issue is he gave Dept. credentials to

the person locally that's attached to campaigns which is outside department policy and practice as this person has nothing to do with law-enforcement.

Sent from my iPhone

Begin forwarded message:

From: David Adamczyk <dmadamczyk@gmail.com>
Date: April 24, 2025 at 4:17:38 PM EDT
To: Max Garbarino <mgarbarino@hamtramckcity.gov>
Subject: Concerns and Notice

Asking for privacy in fear of further retaliation.

MAX,

Per our call today and yesterday, I am concerned on several levels that my attachment to the chief's office and his assignments have presented a potential conflict to my official duty in conflict with a commanding officer.

Per our call, I am notifying you as directed to place these items in writing and notice of the items in case further retaliatory efforts continue and or present further misleading information casting negative light to my employment, reputation as an officer with the City of Hamtramck. I am making this report to this governmental agency and the next chain of command internally within the City of Hamtramck at this time. I apologize for the brevity, but I am out of state in training and trying to place notice while learning in a class.

My concerns at a minimum:

1. I have been asked by the chief to assist a friend of his recover a stolen vehicle out of New York which resulted in the chief hiding/storing the vehicle in the rear yard of a close acquaintance of his in Livonia. I personally verified the vehicle was stolen by LEIN and also spoke with a

NYPD officer who confirmed there was an open case. The financial backer of the vehicle (friend of Chief) came to town and met myself by direction of the chief along with Ibrahim Algaheim(sp) who assisted the chief and his friend in this recovery of a failure to return.

2. I am concerned that the Chief has mis-represented my name and involvement in a council investigation inferring that he had no part or knowledge when in fact he had daily updates from myself and Sgt. Goerge along with joint meetings with yourself and us two or three on numerous dates. The conveyance of this to council was inaccurate and troubling as he mis-represented the facts and personally named me in an email divulging a criminal investigation outside the department thus jeopardizing the Attorney General Investigation and out internal efforts thus creating a conflict with internal councilman and elected officials.
3. I have been party to several incidents where the Chief's significant other Mariam Ahmed has made statements that the chief has abused her physically, had committed domestic violence and I was advised to not use a body camera when in uniform. On one of the last incidents, I was called to respond to assist him moving his personal items out of the home at which time I did have body camera on and I believe that evidence is uploaded and secured with password with Sgt George.
4. I also have direct knowledge that the chief is conspiring with local parties and members from New York to pay a 1million dollar fee to get President Trump to pardon a convicted felon charged with banking fraud I believe out of New York.
5. Most recently as of today, I was verbally advised by Sgt George to follow chain a command, and all my communication is to go through him while there's direct communications that state that the special assignment specifically my position report directly to the chief which is now further evidence of conflicting general orders, and directives along with misinformation as he has me handling social media items through him, which confuses the direction as there's many different schemes I believe happening due to political functions and instability with his office and city administration as well. I'll forward all communications as last verbally directed to the sergeant until further order.

I am concerned that my knowledge of his actions that he knows I know is further placing me in jeopardy of my position and employment and ask that this be held confidential as I believe this constitutes a whistle blower claim as I am seeing negative activity toward my employment.

Officer David Adamczyk

David Adamczyk

(586) 855-7877 Direct

dmadamczyk@gmail.com

Sent from my iPhone

EXHIBIT 7

May 7, 2025

To: Lt. Ed Price
Michigan State Police

RE: Notification of incidents/information with Chief Jamiel Altaheri

Lt. Price,

This summary and outline shall serve as follow-up to our meeting at the MSP 2nd Dist. Headquarters with regard to information and incidents surrounding Chief Jamiel Altaheri:

The information I have concerns serious matters related to directives and knowledge I acquired while serving under Chief Altaheri. I believe this information reflects not only violations of city and departmental policies but also potential breaches of the law, as well as conduct that undermines public trust and the oath of office required of a licensed officer in the state of Michigan.

These events occurred approximately between September 2024 and May 2025. Despite the relatively short timeframe, I believe there is evidence to suggest that Chief Altaheri engaged in a pattern of behavior aimed at grooming members of the department in order to shield or obscure his actions and protect sensitive information. I am reporting this information as directed by my City Manager which was derived from my concerns as a member of society (former resident of Hamtramck), a tax payer of Hamtramck and citizen of Michigan.

ITEM 1 – DOMESTIC VIOLENCE INCIDENTS

Upon return to the department in September of 2024, I learned that there have been a few incidents where officers responded to the home of domestic disputes with he Chief advising officers not to put these to paper. One incident was with officer's present with Marian and the Chief. Mariam was allegedly intoxicated or possibly using pills and a domestic event happened. CLEMIS does not reflect any of this, just a basic entry and per officers this was directed to not write paper by the chief.

In my position assigned to this office, I had personal knowledge of phone calls and interactions with him and his significant other. In 2 occasions (nov 2024 – Dec 2024) Mariam has made comments that the Chief has hit her and punched her. The Chief attempted to dismiss this each time stating "She is not well, she is crazy, she is an animal, she is not wright"… In my professional capacity, I advised the Chief of these incidents, that they constituted domestic at which time I was lectured by the Chief with him stating "You guys here in Michigan don't handle things the correct way, you guys make everything formal". At the time, I did not see any physical injury to Mariam or the child in these statements made in my present.

In December 2024, the Chief and Mariam joined my family on a New Year's cruise to the Caribbean. On or around January 2nd or 3rd, 2025, Mariam discovered evidence on the Chief's phone of an affair with Alia Hamka, a local school principal at Tau Beta Elementary in Hamtramck. This led to a heated altercation, during which Mariam—under the influence of alcohol—reported being physically assaulted by the Chief, including being pushed and struck. She claimed he ripped off one of her fingernails as she attempted to steady herself during the altercation.

The following day, the Chief left Mariam alone at port in Aruba. She reached out to my family, and I accompanied her for the day. During this time, she confided in me about ongoing domestic abuse, including incidents in Hamtramck and New York. While she acknowledged that some episodes involved alcohol, she emphasized that many did not. She described one instance in which the Chief allegedly locked her inside their Hamtramck home for an extended period, leaving her unable to care properly for their child without.

Later that day, while shopping with my wife, daughter, and Mariam, local authorities detained her for allegedly taking a garment from a store. She claimed it was unintentional and was embarrassed by the incident. The item was returned without charges, and she rejoined us on the cruise ship.

That evening, while on deck, Mariam again confronted the Chief in the presence of myself and my wife. The conversation escalated, and Mariam began recounting incidents of domestic abuse, including being punched in the stomach and struck in the head with a shower curtain. My wife, upon hearing these details for the first time, began recording the conversation. The recording was preserved.

Due to the continued conflict, cruise staff assigned Mariam her own room, and arrangements were made for her to return to New York by flight that Jamiel arranged the following day from Bonaire, which she did without further incident.

ITEM 2 – Conspiracy to bribe/Violation of conduct/personal bias conflicts

Beginning in December 2024, I was present on multiple occasions either in Chief Altaheri's office or in his company during phone conversations he had with individuals based in New York. These calls appeared to revolve around the Chief facilitating introductions between his contacts in New York and a man named Mark Zarkin, whom he described as a close associate of President Donald Trump.

According to Chief Altaheri, he and Zarkin were jointly working on a scheme to secure a presidential pardon for one of the Chief's acquaintances—a wealthy individual from New York who had been charged and/or convicted of serious financial crimes. The Chief stated that in exchange for arranging the pardon, a payment between $1 million and $5 million would be made to President Trump through Zarkin. The Chief told me that this amount was insignificant to the individual involved, given their level of wealth.

The Chief explained that Zarkin played a key role in former President Trump's visit to Hamtramck, leveraging his influence with both the Mayor and the Chief. When I questioned the Chief about his own involvement and potential benefit, asking, "What's in it for you?" he replied, "10 points." Upon further questioning, he clarified that Zarkin would receive 10% of the overall payment, and that he (Chief Altaheri) would receive 10% of Zarkin's share. When I asked, "Ten thousand dollars?" the Chief responded, "At least."

In addition to the phone calls, I was physically present for two in-person meetings where this topic was discussed. The first meeting took place at a Tim Hortons located at 12 Mile and Halsted in January or February 2025. During this meeting, Zarkin spoke candidly, claiming to be a "close friend of President Trump," and stated that he had "direct access to him, Mar-a-Lago, and his personal cell."

The second meeting occurred on March 9, 2025, at Zarkin's restaurant in Farmington Hills. In attendance were Chief Altaheri, his associate "Ralph" (who had traveled in to finalize details), Ibrahim Aljahim, and myself. The discussion continued to center on advancing the pardon arrangement.

ITEM 3 – LAW ENFORCEMENT ID

Chief Altaheri directed civilian employee Andrew Robinson to create a Hamtramck Police Department identification card for Mark Zarkin, designating him with the title "Chief Director." According to statements made directly to me by Chief Altaheri, this was done in exchange for a cash payment of several thousand dollars. The Chief indicated that Zarkin had previously "lost his credentials" and needed a new form of identification to facilitate ongoing efforts involving former President Trump.

It is important to note that Mark Zarkin is not, and has never been, employed by the City of Hamtramck in any official capacity. He does not meet the qualifications set forth by MCOLES (Michigan Commission on Law Enforcement Standards) and would not be eligible for any law enforcement designation. Furthermore, the Chief does not possess the legal authority to confer or assign law enforcement credentials or honorary titles akin to the deputization powers held by county sheriffs.

The creation and issuance of this identification card constitutes a clear violation of departmental and city policies, and represents a serious misuse of authority and public trust.

ITEM 4 – STOLEN VEHICLE

On March 9, 2025, following a meeting with Mark Zarkin in Farmington Hills, Chief Altaheri informed me during the drive back that he needed my assistance with a favor for his associate, Ralph. During the conversation, the Chief and Ralph discussed a white Mercedes-Benz G-Class AMG G63, identified by VIN: W1NYC7HJ8NX459395, which had been reported stolen and was currently located in the Dearborn area.

While in the vehicle, the Chief instructed Ralph to “fill him in.” Ralph explained that the vehicle was originally involved in a private sale at one of his car lots in New York. According to Ralph, a dispute occurred involving the purchaser and her boyfriend—a Michigan resident—resulting in the boyfriend taking the vehicle without authorization and bringing it to Michigan. I was told that the individual had connections to both Hamtramck and Dearborn.

Chief Altaheri stated that Ibrahim Aljahim knew the parties involved and would be joining Ralph and me to help retrieve the vehicle, which was to be delivered to the Chief’s new residence in Livonia—specifically, the home of his new spouse.

Upon returning to the station, I ran the vehicle’s information through LEIN and confirmed it was officially listed as stolen. I advised the Chief of this, and he acknowledged it, providing me with the contact information of an NYPD detective—Detective Rayson from the Warrants Division (cell: 929-270-8759)—who was reportedly handling the case. I called Det. Rayson, who confirmed that the vehicle was actively listed as stolen.

When I questioned the Chief about involving the Dearborn Police Department to recover the vehicle properly, he dismissed the suggestion and instructed me not to ask questions. He told me to assist Ralph and use my unmarked undercover police vehicle, equipped with emergency lights, to help facilitate the recovery.

Later that evening, I followed Ralph and Ibrahim to a condominium complex in Dearborn. There, we encountered four Arabic males, and Ralph took possession of the vehicle. Afterward, I contacted the Chief, who advised he was waiting at the Livonia residence. I followed the vehicle to that location, where the Chief directed that it be driven across the lawn and around the back of the property to conceal it in the rear yard. When I asked, “What the hell are we doing?” the Chief responded that everything was fine and that he and Ralph would handle it from that point forward.

I then drove Ibrahim home to Hamtramck, while Ralph departed in a rental vehicle, presumably heading back to his hotel near the airport.

ITEM 5 – LOCAL ELECTION AND INFLUENCE

There have been several incidents in which Chief Altaheri has actively advocated to members of the City Council for the removal of the City Manager, allegedly in retaliation for the City Manager's role in reporting election fraud concerns. While I am unsure if this information is required, the following related concerns are significant and summarized as follows:

1. **Criminal Associations**: The Chief is in possession of personal information involving a local resident suspected of participating in home invasions and deed fraud schemes related to the illegal transfer of property ownership. This individual is reportedly related to a current councilmember.
2. **Orchestrated Disruption**: Chief Altaheri has solicited the involvement of Hass Cash, an individual from Dearborn, to disrupt City Council meetings and to publicly target Max Garbarino in an effort to have him removed. These discussions occurred in my personal office. It is worth noting that Hass Cash is a relative of the Chief's current wife, Alia Hamka.
3. **Election Fraud Leak**: The Chief has had direct access to sensitive election fraud evidence and ongoing investigative updates. There is a strong belief that he is the source of internal leaks to a suspect councilmember who is under scrutiny.
4. **Misrepresentation and Manipulation**: Chief Altaheri has misrepresented my involvement and actions related to the election fraud investigation in an apparent effort to distance himself from the matter publicly. Despite this, he has personally authorized various elements of the investigation behind the scenes.

** If additional information is needed, please advise.

ITEM 6 – SOLICITATION FOR MONEY

Chief Altaheri made several initial attempts to have me approach Louie, the owner of Nationwide Towing, to solicit financial sponsorship—specifically requesting between $40,000 and $50,000—to fund the "Chief's Corner" podcast or other related projects. The Chief repeatedly expressed sentiments such as, "We've got to find a way to get paid, make some money." He also directly suggested to me that, if the funds from Nationwide were secured, we could split the money between us.

ITEM 7- REPORTING

I began reporting this information to City Manager Max Garbarino and the City Attorney on or around April 19, 2024, and followed up again on April 24, 2025.

Following these disclosures, Max instructed me to report the matter to the FBI in early May. He then directed both myself and Sgt. George to bring the information to the Michigan State Police (MSP) during the current week.

INVESTIGATIVE NOTES:
Chief Altaheri, along with Ralph and Mark Zarkin, consistently use WhatsApp for their communications, which poses a significant risk of evidence spoliation over time if the data is not properly preserved.

Subjects:

Chief Jamiel Altaheri
5224 Trowbridge, Hamtramck, MI 48212
313-519-0043 – Dept Cell
347-255-8218 – Personal Cell (Note – he has current phone and a recent prior but in possession with evidence on it)
Mariam Ahmed
5224 Trowbridge, Hamtramck, MI 48212
347-925-5929
Joseph Altaheri (Jamiel and Mariam son – 2yr old)
5224 Trowbridge, Hamtramck, MI 48212
Ibrahim Aljahim
Resides on Homes St, Hamtramck, MI
(** Convicted Sex Offender – Incapacitated Victim **)
313-603-6114
Mark Zarkin
Resides in Farmington Hills
Owns: Steve Lellis on the green
(Former Wayne County Chief of Civilian force – under former sheriff)
(** Convicted Sex Offender – Incapacitated Victim **)
Possible Cell: 248-212-9022
Cell: 586-909-8919
Ralph – Chief Friend from New York
646-820-8452

EXHIBIT 8

From: David Adamczyk <dadamczyk@hamtramckcity.gov>
Date: May 20, 2025 at 2:13:14 PM EDT
To: R Strohauer <rstrohauer@hamtramckcity.gov>, Jon Daugherty <jdaugherty@hamtramckcity.gov>
Cc: Mashana Burton <mburton@hamtramckcity.gov>
Subject: Report of Harassment

POAM,HR

I am writing to inform and report the activities of the Chief of Police Jamiel Altaheri as to verbal and physical Harassment directed toward myself in and on the following ways that follow my reporting of his actions as previously noticed:

1. The Chief has a brief history over the past 60 days with retaliatory verbal remarks against myself for informing him of my concerns for prior assignments/orders that go against department policy and or law. This behavior accelerated additionally for prior friendship with the City manager Max Garbarino. The Chief has negatively spoke against me in front of command and in front of city administration with regard to the department's pursuit of election fraud and my friendship with Max post my notice to him.
2. I was directed to attend a meeting on May 2, 2025 where the Chief spoke in a intimidating manner with hostile tones and name calling stating I was a "4 year wonder" in front of City Administration, City Attorney, City Clerk, Deputy Chief and Sgt. George. This centered around again election fraud disputes and the Chief's own disputes with regard to his personal working relationship with city management. Immediately after, I along with City Clerk and Deputy Chief were ordered into the hallway, where the Chief began to scream at the City manager that was clearly heard through the third-floor offices.
3. I telephoned the chief after this meeting on Saturday, inquiring and expressing my concerns of treatment when he inquired. He further continued with "You

and Max" this and "You and Max" that with regard to his issues with election items that are now taken out on me. The Chief additionally places negative activity against me for his employment terms where he is repeatedly asking for a raise to the City Manager and threatening me of discharge if I grant max his MCOLES Certification before the chief's raise. The Chief was made aware that his direction of me was "reported up" outside our chain. He began upset as i told him I was not comfortable with his directions and orders. The Chief continued to display hostile conversations with again direction toward me that center around his employment issues with his boss. The call ended when he hung up.

4. The Chief went out of town and while out texted me the following:

> *Chief Text: 5/15/25 @ 4:11pm*
> *"When I get back we need to have a respectful sit down as law enforcement professionals and mature adults. When it comes to work related issues via official Department messages (Email, etc.) chain of command is important because Detective Commander and Deputy Chief should be in loop of what kind of case work is going on.*
>
> *However, for the sake of a healthy work environment and relationship we need to address job toxity and rumors - real or perceived. Feel free to have your union representatives if you wish -This is not a disciplinary hearing. If you are willing to talk let me know. "*

This was responded to with acknowledgment along with the union without incident. A date was set for Tuesday May 20th @ 10am.

5. On May 15, 2025, as Detective Strohauer and I were walking into the station, it was clear the Chief observed the two of us pull up in my vehicle as he turned and waited on the porch step outside the door with a very grimace look on his face. As we approached, he ordered me into the building in a very derogatory tone and manner without incident or need.
6. On May 20, 2025 the meeting as previously mentioned took place in the office of Sgt. Geroge. In attendance was Chief Altaheri, D/C Mileski, Sgt. George, Det. Strohauer, Det Daugherty, Inv. Budnick and myself Inv. Adamczyk. While approaching the room, Chief Altaheri directed in a strong and negative tone for myself and Inv. Budnick to sit alongside each other in the smaller couch. This behavior from the Chief was not directed at any other in attendance, nor did he have the same demeanor toward any
others.
    a. As I sat down, Chief Altaheri stated to other command, " Get the Sheriff from downstairs". This was odd as there was no Sheriff personnel in the building. Furthermore, the Chief stated in the meeting he spoke with Sheriff personnel the day prior regarding the Fraud position and I was immediately ordered to go get their equipment with escort by internal affairs Sgt. Golla and Det. Strohauer. While there was/is no incident for the tone and immediate demand, this was still performed as directed. Upon return, all parties returned to their respective seats where thee chief led a strong and unprofessional meeting where at times he pounded on the desk next to me which totally contradicts his text message that was confirmed in writing in email.

I am formally making a complaint on the Chief of Police for the following sections taken from our Rules and Regulations:

§2.123 DEFINITIONS

A. Harassment

Any form of conduct that is objectively unreasonable or offensive and that could result in a hostile or intimidating working environment.

§2.124 PROHIBITED ACTIVITIES

A. Prohibited activity under this policy includes but is not limited to following.

1. No employee shall ridicule, mock, deride or belittle any person.

2. Employees shall not make offensive or derogatory comments to any person, either directly or indirectly.

3. The following list of behaviors, while not all-inclusive, provides examples of other conduct that is also prohibited:

b. Engaging in bullying or intimidating acts (whether directed at a specific person or not)

c. Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress

d. Verbal abuse

B. Supervisors Responsibilities

Although all employees shall be responsible for preventing harassment and/or discrimination, supervisors shall be responsible for:

1. Advising employees on the types of behavior prohibited and the agency procedures for reporting and resolving complaints of harassment and discrimination.

2. Monitoring the work environment on a daily basis for signs that harassment and discrimination that may be occurring.

3. Stopping any observed acts that may be considered harassment and discrimination, and taking appropriate steps to intervene, whether or not the involved employees are within his/her line of supervision.

4. A supervisor shall utilize all reasonable means to prevent a prohibited act from occurring when he or she knows or should know that an employee will or may perform such an activity.

5. No supervisor shall make any employment decision that affects the terms, conditions, or privileges of an individual's employment based on the basis of that person's race, sex, religion, national origin, color, sexual orientation, age or disability.

6. Taking immediate action to prevent retaliation towards the complaining party and to eliminate the hostile work environment where there has been a complaint of harassment and/or discrimination. If a situation requires separation of the parties, care

should be taken to avoid action that punishes or appears to punish the complainant. Transfer or reassignment of any of the parties involved should be voluntary if possible and, if non-voluntary, should be temporary pending the outcome of the investigation.

7. Any conduct covered by this policy that comes to the attention of a supervisor shall result in an investigation.

8. Each supervisor has the responsibility to assist any employee of this agency who comes to that supervisor with a complaint of harassment and discrimination in documenting and filing a complaint.

E. Retaliation

1. Retaliation against any employee for filing a harassment or discrimination complaint or for assisting, testifying, or participating in the investigation of such a complaint is prohibited by this agency.

F. Respect to Subordinate Ranked Personnel

1. Supervisor Shall Display Respect Towards Subordinate-ranked Personnel

Supervisors shall treat subordinates with the same courtesy and respect that is required of subordinates toward supervisors. Criticism of a member or of a member's performances will be made directly to the subordinate and, when practicable, in a private setting. Because supervisors are management's representatives, they will be held to a higher standard in this area; and, they are expected to set a positive example for others to follow.

David Adamczyk

Special Investigator

-TFO- Fraud Division

313-800-5281Station

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In case of emergency: Dial 911

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