

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

CHRISTOPHER MASON,

Plaintiff,

v.

Case No: 3:25-cv-497

CITY OF MADISON AND MORGAN YOUNGQUIST,

Defendants.

COMPLAINT

Plaintiff Christopher Mason, by his attorneys, Strang Bradley, LLC, for his complaint against Defendants, states:

INTRODUCTION

1. This is a civil rights lawsuit brought pursuant to 42 U.S.C. § 1983 to redress the deprivation under color of law of Christopher Mason's constitutional right to be free from unreasonable search and seizure in violation of the Fourth Amendment of the United States Constitution.

2. On January 12, 2023, City of Madison Police Officer Morgan Youngquist conducted a traffic stop of Mason without reasonable suspicion, unlawfully extended the scope and duration of the traffic stop to wait for a K-9, and searched Mason's vehicle without reasonable suspicion that Mason had engaged in criminal conduct.

JURISDICTION AND VENUE

3. This Court has jurisdiction over federal claims pursuant to 28 U.S.C. § 1331.

4. Venue is proper under 28 U.S.C. § 1391(b)(2). Defendant City of Madison is a political subdivision of the state of Wisconsin located within this judicial district. Additionally, the events giving rise to the claims asserted herein occurred within the judicial district.

PARTIES

5. Plaintiff Christopher Mason is a resident of the State of Wisconsin and Dane County.

6. Defendant City of Madison is a political subdivision of the state of Wisconsin and is or was the employer of the individual Defendant and is required to pay any tort judgment for damages for which its employees are liable for acts within the scope of their employment.

7. Defendant Morgan Youngquist was, at the time of this occurrence, employed as a police officer for the City of Madison Police Department.

8. At all times Defendant Youngquist interacted with Plaintiff on January 12, 2023, Youngquist was on duty, acting under color of state law, ordinance, and regulation.

9. At all times Defendant Youngquist interacted with Plaintiff on January 12, 2023, Youngquist acted within the scope of his employment with the City of Madison.

FACTS

10. On January 12, 2023, Christopher Mason was driving in Madison.

11. Mason was pulled over by City of Madison Police Officer Morgan Youngquist.

12. Youngquist informed Mason that the reason for the traffic stop was because Mason drove through a stop sign without coming to a complete stop at the intersection of Brentwood Parkway and Trailsway in Madison, Wisconsin.

13. At the time Youngquist pulled Mason over, there was no stop sign on any road at the intersection of Brentwood Parkway and Trailsway.

14. At no time has there ever been a stop sign on any road at the intersection of Brentwood Parkway and Trailsway.

15. Youngquist ordered Mason to get out of his car and Mason complied.

16. Youngquist asked Mason if he could search Mason and Mason consented to a search of his person.

17. Nothing of significance was found when Youngquist searched Mason.

18. Youngquist then asked Mason twice if he could search his car.

19. Mason twice declined Youngquist's request to search his car.

20. Youngquist then told Mason that they would be waiting for K-9 to arrive for a dog sniff of his vehicle.

21. Further deviating from the supposed mission to cite Mason for failing to stop at a stop sign, Youngquist began asking Mason about where he was going and why.

22. Mason declined to answer any more questions.

23. Youngquist told Mason that if he refused to talk, he was going to handcuff him.

24. Youngquist then handcuffed Mason and placed him in the back of his squad car.

25. Backup officers arrived, and Youngquist told the officers that Mason was arrested downtown by Officer Tank for selling crack and heroin about two weeks ago, and that during his arrest, Mason told Officer Tank that he buys his product in Brentwood.

26. It is not true that Mason was previously arrested downtown for selling crack and heroin. Youngquist knew it wasn't true.

27. It is not true that Mason was arrested about two weeks prior to Defendant Youngquist's interaction with Mason on January 12, 2023. Youngquist knew it wasn't true.

28. It is not true that during his prior arrest, Mason told Officer Tank that he buys his product in Brentwood. Youngquist knew it wasn't true.

29. Defendant Youngquist would later write in his police report that he initiated the traffic stop of Mason because he observed the vehicle drive northbound on Brentwood Parkway and proceed to completely disregard the stop sign at Brentwood Parkway and Trailway, not coming even close to a complete stop, and that the vehicle then continued eastbound on Trailway.

30. It is not true that Mason failed to stop at a stop sign at Brentwood Parkway and Trailway. Youngquist knew it wasn't true.

31. Youngquist asked Mason whether he was on probation or extended supervision, and Mason confirmed that he was.

32. Youngquist then canceled his request for a K-9 dog and informed Mason that he would search the vehicle.

33. Youngquist then proceeded to search Mason's vehicle.

34. At no time did Mason consent to the search of his vehicle.

35. Youngquist never had a warrant to search Mason's vehicle.

36. At the time Youngquist searched Mason's vehicle, Youngquist did not have reasonable suspicion or probable cause to believe that Mason had committed any crime.

COUNT 1:
42 U.S.C. § 1983 Claim for Unlawful Seizure

37. Plaintiff realleges the above paragraphs.

38. The actions of Defendant Youngquist in seizing Plaintiff by conducting a traffic stop of Plaintiff without reasonable suspicion or any other permissible legal justification, and extending the scope and duration of the traffic stop to wait for a K-9, without reasonable suspicion, violated Plaintiff's Fourth Amendment right to be free from unreasonable seizures and thus violated 42. U.S.C. § 1983.

39. As a direct and proximate result of Defendant Youngquist's unlawful actions, Mason suffered damages including loss of liberty, mental distress, humiliation, and invasion of privacy.

WHEREFORE, pursuant to 42 U.S.C. §§ 1983 & 1988, Plaintiff demands actual or compensatory damages against Youngquist and, because he acted in reckless disregard for Plaintiff's rights, punitive damages, plus the costs of this action, attorneys' fees, and such other relief that the Court deems just and equitable.

COUNT 2:
42 U.S.C. § 1983 Claim for Retaliation

40. Plaintiff realleges the above paragraphs.

41. Defendant Youngquist escalated the detention of Mason into an arrest after Mason exercised his constitutional right not to answer questions.

42. Defendant Youngquist retaliated against Mason for exercising his constitutional right not to answer questions by handcuffing Mason and placing him into the back of his squad car.

WHEREFORE, pursuant to 42 U.S.C. §§ 1983 & 1988, Plaintiff demands actual or compensatory damages against Youngquist and, because he acted in reckless disregard for Plaintiff's rights, punitive damages, plus the costs of this action, attorneys' fees, and such other relief that the Court deems just and equitable.

COUNT 3:
42 U.S.C. § 1983 Claim for Unlawful Search

43. Plaintiff realleges the above paragraphs.

44. The actions of Defendant Youngquist in searching Plaintiff's vehicle without reasonable suspicion or any other permissible legal justification violated Plaintiff's Fourth Amendment right to be free from unreasonable searches and thus violated 42 U.S.C. § 1983.

45. Defendant Youngquist acted recklessly and with callous indifference to the federally protected rights of Plaintiff.

46. As a direct and proximate result of Defendant Youngquist's unlawful actions, Mason suffered damages including loss of liberty, mental distress, humiliation, and invasion of privacy.

WHEREFORE, pursuant to 42 U.S.C. §§ 1983 & 1988, Plaintiff demands actual or compensatory damages against Youngquist and because he acted in reckless disregard for Plaintiff's rights, punitive damages, plus the costs of this action, attorneys' fees, and such other relief that the Court deems just and equitable.

**COUNT 4:
Indemnification Claim Against City of Madison**

47. Plaintiff realleges the above paragraphs.

48. Wisconsin law, WIS. STAT. § 895.46, requires public entities to pay any tort judgment for damages for which employees are liable, for acts within the scope of their employment.

49. At all times relevant to this action, Defendant Youngquist engaged in the conduct complained of while he was on duty and in the course and scope of his employment with the City of Madison.

WHEREFORE, Plaintiff asks this Court to find that the City of Madison is liable to defend this action against Defendant Youngquist and to satisfy any judgment entered against him, by virtue of WIS. STAT. § 895.46.

JURY DEMAND

Plaintiff hereby demands a trial by jury, pursuant to FED. R. CIV. PRO. 38(b), on all issues so triable.

Respectfully submitted,

Dated: 13 June 2025,

STRANG BRADLEY, LLC
Attorneys for Plaintiff

/s/ R. Rick Resch
John H. Bradley
Wisconsin Bar No. 1053124
R. Rick Resch
Wisconsin Bar No. 1117722
William E. Grau
Wisconsin Bar No. 1117724
Strang Bradley, LLC
613 Williamson St., Suite 204
Madison, WI 53703
(608) 535-1550
John@StrangBradley.com
Rick@StrangBradley.com
William@StrangBradley.com