

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

DENNIS VANDERLAAN and
DAYNELLE VANDERLAAN,
Plaintiffs,

Case No.: 25-cv- 1541
Honorable _____

v.

**COMPLAINT
JURY DEMANDED**

CAMERON WRIGHT,
in his individual capacity,
Defendant

_____/

OUTSIDE LEGAL COUNSEL PLC
PHILIP L. ELLISON (P74117)
Attorney for Plaintiffs
530 West Saginaw St
PO Box 107
Hemlock, MI 48626
(989) 642-0055
pellison@olcplc.com

COMPLAINT

NOW COME Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN,
by and through counsel, and complains unto the Court as follows:

PARTIES

1. Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN are residents of the State of Michigan and the owner(s)/occupant(s) of private property located on East Moore Road in Newaygo County, Michigan.
2. Defendant CAMERON WRIGHT is a conservation officer employed by the Michigan Department of Natural Resources (“DNR”) and is sued in his individual capacity.

GENERAL FACTS

3. On or about November 15, 2025, the opening day of Michigan rifle deer hunting season, Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN were seated inside their enclosed hunting blind on their own privately-owned property located in Newaygo County during lawful hunting hours.
4. The East Moore Road property is privately owned by Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN.

5. Where Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN were hunting on their private property was not accessible by or open to any member of the general public.

6. Without a warrant, consent, emergency, or any articulable suspicion of wrongdoing, Defendant CAMERON WRIGHT warrantlessly and permissionlessly entered Plaintiffs' private property from the direction of an adjacent private parcel.

7. Defendant CAMERON WRIGHT walked behind the hunting blind scaring all the game and then approached the front opening of blind to confront Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN.

8. The interaction is caught on video, <http://olcplc.com/s/hTka>.

9. Without privilege, probable cause, a lawful basis, or any articulable suspicion of wrongdoing Defendant CAMERON WRIGHT initiated accusatory questioning and continued to question Plaintiffs while the latter were attempting to lawfully hunt on their property.

10. At no point prior to the initiation of the encounter did Defendant CAMERON WRIGHT have reasonable articulable suspicion of any hunting violation or criminal activity.

11. Conservation Officer CAMERON WRIGHT approached from the neighboring property, walked behind the enclosed blind, and then came to the front opening to confront Plaintiffs while armed, hand on his firearm, while in uniform.

12. Conservation Officer CAMERON WRIGHT opened the encounter with accusatory questioning without any observed violations.

13. Defendant CAMERON WRIGHT's entry and approach were for the purpose of gathering information for possible enforcement action—not for any community-caretaking purpose; therefore his conduct therefore constituted an investigatory seizure requiring, at minimum, reasonable suspicion.

14. Plaintiffs were confined within the blind, in a remote area, with an armed uniformed officer at the entrance with his hand on his weapon, and did not feel free to terminate the encounter.

15. A reasonable person in Plaintiffs' position would not have felt free to terminate the encounter.

16. Plaintiffs had no ability to leave the blind without physically pushing past the armed officer blocking the only exit, further reinforcing the involuntary nature of the detention.

17. By blocking the only exit to the enclosed blind, approaching with hand on firearm, and using a commanding tone, Defendant CAMERON WRIGHT applied an

unambiguous show of authority that a reasonable person would understand as requiring involuntary compliance.

18. Defendant CAMERON WRIGHT acknowledged during the hostile encounter that Plaintiffs had valid licenses and that Plaintiffs had done everything right.

19. Despite that, Defendant CAMERON WRIGHT stated he would write a report and send it to the prosecutor “to see what happens,” despite acknowledging he lacked any proof of wrongdoing.

20. The encounter disrupted Plaintiffs’ lawful hunt, scared off game, and caused fear, anxiety, annoyance, and apprehension about future intrusions.

21. Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN experienced fear, annoyance, anxiety, and distress during and after the confrontation and remains apprehensive about future intrusions by Defendant CAMERON WRIGHT and his customary practice of violating state law and the Fourth Amendment.

**COUNT I
TRESPASS
(STATE LAW)**

22. Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN incorporate all preceding paragraphs as though fully set forth herein.

23. Under Michigan law, trespass occurs when a person intentionally enters land in possession of another without permission or legal justification.

24. Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN possessed and exclusively occupied the land where the incident occurred.

25. Defendant CAMERON WRIGHT intentionally, knowingly, and without permission entered onto Plaintiffs’ private property without permission, authority, or privilege.

26. Defendant CAMERON WRIGHT’s presence was not justified by any warrant, exigency, statutory authority, implied license, or common-law privilege.

27. Defendant CAMERON WRIGHT’s trespass caused and continues to cause Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN to suffer distress, anxiety, annoyance, and interference regarding the peaceful use and enjoyment of private property.

28. Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN do not seek damages under this Count but instead injunction enjoining Defendant CAMERON WRIGHT’s custom, practice, and actions of entering Plaintiffs’ property without a warrant, permission, or legal justification.

COUNT II
UNLAWFUL DETENTION / UNREASONABLE SEIZURE
42 U.S.C. § 1983

29. Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN incorporate all preceding paragraphs as though fully set forth herein.

30. On November 15, 2025, Defendant CAMERON WRIGHT was acting under color of state law during the incident.

31. By approaching Plaintiffs in their hunting blind, positioning himself in a way that restricted Plaintiffs' freedom of movement, and conducting accusatory questioning for approximately ten minutes, Defendant CAMERON WRIGHT intentionally applied a show of authority that restrained Plaintiff's liberty.

32. Under the totality of circumstances—including the remote location, confinement in the blind, the officer's uniform and firearm, and the accusatory nature of the questioning—a reasonable person in Plaintiffs' position would not have felt free to leave or terminate the encounter with Defendant CAMERON WRIGHT.

33. At the moment the detention began, Defendant CAMERON WRIGHT possessed no reasonable suspicion of any violation of law.

34. The detention on November 15, 2025 violated Plaintiffs' rights under the Fourth Amendment as incorporated against the states through the Fourteenth Amendment.

35. As a direct and proximate result, Plaintiffs suffered emotional distress, fear, annoyance, anxiety, and loss of personal security and dignity.

36. Defendant CAMERON WRIGHT's conduct was willful, wanton, and in reckless disregard of Plaintiffs' federally protected rights, entitling Plaintiffs to punitive damages.

37. No reasonable officer could believe such conduct to be lawful.

COUNT III
FOURTH AMENDMENT MALICIOUS PROSECUTION
42 U.S.C. § 1983

38. Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN incorporate all preceding paragraphs as though fully set forth herein.

39. During the November 15, 2025 interaction, Defendant CAMERON WRIGHT stated that he was going to write a report to send the prosecutor to seek charges against Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN despite lacking probable cause to believe either had committed any offense in his presence.

40. Defendant CAMERON WRIGHT, acting under color of state law, knowingly and intentionally forwarded official reports and narrative statements that, on information and belief, recommended prosecution regarding Plaintiffs' lawful activities on November 15, 2025, despite lacking probable cause to believe Plaintiffs had committed any offense.

41. At the time Defendant CAMERON WRIGHT initiated or influenced the initiation of prosecutorial proceedings, he knew there was no hunting violation, as reflected in the video-recorded interaction in which Defendant CAMERON WRIGHT expressly acknowledged that Plaintiffs had committed no offense.

42. Notwithstanding this knowledge, Defendant CAMERON WRIGHT did, on information and belief (as he stated he would), forwarded charges or materially contributed to the initiation of prosecutorial review by preparing and submitting reports that implied violations thereby falsifying or manipulating the narrative to justify his prior unconstitutional detention.

43. Defendant CAMERON WRIGHT's initiation of prosecutorial review and forwarding of false allegations subjected Plaintiffs to a continuing seizure.

44. Defendant CAMERON WRIGHT's preparation and submission of reports implying wrongdoing violates clearly established Fourth Amendment law.

45. Defendant CAMERON WRIGHT's conduct was undertaken with malice, ill will, or reckless disregard for Plaintiffs' constitutional rights, and/or for the purpose of concealing or retroactively justifying an unlawful investigatory detention made without reasonable suspicion.

46. Defendant CAMERON WRIGHT's actions caused Plaintiffs to suffer a continuing deprivation of liberty consistent with a Fourth Amendment seizure, including fear of imminent prosecution, anxiety, annoyance, emotional distress, reputational harm, and ongoing uncertainty associated with a pending criminal referral instigated without cause.

47. Defendant CAMERON WRIGHT's knowingly baseless referral and falsification of material facts violated Plaintiffs' Fourth Amendment right to be free from malicious prosecution and from the use of fabricated evidence or false implications to initiate prosecutorial action.

JURY DEMAND

48. A jury is demanded for all triable issues.

RELIEF REQUESTED

49. WHEREFORE, Plaintiffs DENNIS VANDERLAAN and DAYNELLE VANDERLAAN respectfully requests this Court to—

- a. Declare that Defendant CAMERON WRIGHT committed a trespass under state law;
- b. Award nominal damages of \$1.00 for having committed a trespass;
- c. Enter an order for injunctive relief to halt any further unannounced and unasked-for trespass(es) by Defendant into the future;
- d. Enter an injunction requiring the destruction and/or expungement of all information and/or data extracted (in whatever medium or form) as well as official reports and narrative statements due to the illegal actions undertaken on November 15, 2025;
- e. Declare that Defendant CAMERON WRIGHT violated the Fourth Amendment on November 15, 2025;
- f. Award compensatory damages under Counts II and III pursuant to 42 U.S.C. § 1983 for having violated the Fourth Amendment;
- g. Award punitive damages under Counts II and III pursuant to 42 U.S.C. § 1983 for having violated the Fourth Amendment;
- h. Award attorney fees and costs pursuant to 42 U.S.C. § 1988(b) and all other applicable statutes, rules, and laws; and
- i. Grant any other relief the Court deems just and proper.

Date: November 24, 2025

RESPECTFULLY SUBMITTED:



OUTSIDE LEGAL COUNSEL PLC
BY PHILIP L. ELLISON (P74117)
Attorney for Plaintiffs
PO Box 107
Hemlock, MI 48626
(989) 642-0055
pellison@olcplc.com