



ECLEG JUN16'11 #1012

COUNTY OF ERIE

MARTIN A. POLOWY
ACTING COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE

THOMAS F. KIRKPATRICK, JR.
ACTING FIRST ASSISTANT COUNTY ATTORNEY

GA

DEPARTMENT OF LAW

MEMORANDUM

TO: Robert Graber, Clerk, Erie County Legislature
FROM: Thomas F. Kirkpatrick, Jr. ^(P) Acting First Assistant County Attorney
DATE: June 14, 2011
RE: Transmittal of New Claims Against Erie County

Mr. Graber:

In accordance with the Resolution passed by the Erie County Legislature on June 25, 1987 (Int. 13-14), attached please find nine (9) new claims brought against the County of Erie. The claims are as follows:

Claim Name

Justin Costantino vs County of Erie, et al.
Roger Miles vs Donald Livingston
Patricia J. Curto vs Erie County Clerk's Office, et al.
Mildred and William Miles vs County of Erie, ECMC, et al.
Mary Trimper vs Erie County Department of Social Services
Robin White vs County of Erie
David Kelly vs County of Erie
Shawn Bulow vs County of Erie, et al.
George Bowser, Jr. vs County of Erie

TFK/crj

Attachments

cc: Jeremy A. Colby, Erie County Attorney

14D-1



COUNTY OF ERIE

JEREMY A. COLBY
ERIE COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MARTIN A. POLOWY
FIRST ASSISTANT COUNTY ATTORNEY

THOMAS F. KIRKPATRICK, JR.
SECOND ASSISTANT COUNTY ATTORNEY

June 14, 2011

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	<i>Constantino, Justin vs County of Erie, Erie County Correctional Facility, Sheriff Timothy Howard and Chief Timothy Love</i>
Document Received:	Notice of Claim
Name of Claimant:	Justin Costantino 120 Carriage Circle Williamsville, New York 14221
Claimant's attorney:	Pro Se

Should you have any questions, please call.

Very truly yours,

JEREMY A. COLBY
Erie County Attorney

By


THOMAS F. KIRKPATRICK, JR.
Second Assistant County Attorney

TFK/mow
Enc.

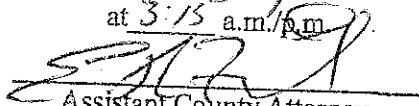
cc: JEREMY A. COLBY, Erie County Attorney

**STATE OF NEW YORK
SUPREME COURT: ERIE COUNTY**

In the Matter of the Claim of

COSTANTINO, JUSTIN

This paper received at the
Erie County Attorney's Office
from Nick Constantino
the 23rd day of May, 2011
at 3:15 a.m./p.m.


Assistant County Attorney
Eric R. Zerbe

NOTICE OF CLAIM

Claimant,
-against-

THE COUNTY OF ERIE,
ERIE COUNTY CORRECTIONAL FACILITY,
SHERIFF TIMOTHY HOWARD,
CHIEF TIMOTHY LOVE

TO: THE COUNTY OF ERIE
ERIE COUNTY CORRECTIONAL FACILITY,
SHERIFF TIMOTHY HOWARD,
CHIEF TIMOTHY LOVE

PLEASE TAKE NOTICE, that JUSTIN COSTANTINO, pro se has and hereby makes claim against THE COUNTY OF ERIE, ERIE COUNTY CORRECTIONAL FACILITY, SHERIFF TIMOTHY HOWARD, and CHIEF TIMOTHY LOVE and in support of said claim states the following:

1. The Post Office address of the claimant is 120 Carriage Circle, Williamsville, New York 14221.
2. The claim of JUSTIN COSTANTINO is for personal injuries, and violations of his state and federal constitutional and statutory rights, including without limitation, loss of income and medical expenses, and for consequential damages generally.
3. The claim arose at the ERIE COUNTY CORRECTIONAL FACILITY, located at 11581 Walden Avenue, in the Town of Alden, County of Erie and State of New York.
4. The claim arose in substance as follows: On the 23rd day of February 2011 at approximately 5:30am, the claimant JUSTIN COSTANTINO, while incarcerated at

the aforesaid ERIE COUNTY CORRECTIONAL FACILITY, was eating breakfast. The said meal consisted of two rolls, one half pint carton of milk, one four ounce container of juice, and approximately one cup of loose dry cereal served in the tray compartment. The said milk was poured over the said cereal, after the said cereal was consumed; the leftover milk was consumed by tilting the tray up to allow for the milk to flow into the claimant's mouth. At this time an unidentified liquid seeped out of a crack in the tray and splashed the claimant on the right side of his chin. Upon further inspection of the tray, the claimant noticed that the tray was indeed cracked, and in the crack there was a foamy substance. Later on the same date the claimant felt discomfort on the chin in the area that the fluid touched. Within 24 hours claimant's chin began to swell and affect the claimant's speech and resulted in serious injuries to the claimant.

5. Upon information and belief, the incident herein described and the resultant injuries and damages sustained were caused as a result of the negligence, carelessness, recklessness and/or unlawful conduct on the part of the agents, servants and/or employees of THE COUNTY OF ERIE, ERIE COUNTY CORRECTIONAL FACILITY, SHERIFF TIMOTHY HOWARD, AND CHIEF TIMOTHY LOVE, among other things, in failing and omitting to properly and adequately instruct, supervise and train correctional officers; in failing and omitting to ensure its correctional officers used appropriate care and discretion; and allowing and permitting its correctional officers used appropriate care and discretion; and allowing and permitting its correctional officers to negligently care for the claimant in such a manner so as to cause severe personal injury. Upon information and belief, THE COUNTY OF ERIE, ERIE COUNTY CORRECTIONAL FACILITY, SHERIFF TIMOTHY HOWARD, AND CHIEF TIMOTHY LOVE, violated his state and federal constitutional and statutory rights.
6. Upon information and belief, as a result of the aforesaid incident, the claimant, JUSTIN COSTANTINO, sustained severe bodily injuries and was painfully and seriously injured; was rendered sick, sore, lame and disabled; and more particularly, JUSTIN COSTANTINO, sustained injuries to his chin. Upon further information and belief, these injuries may result in permanent defects.

WHEREFORE, claimant requests that THE COUNTY OF ERIE, ERIE COUNTY
CORRECTIONAL FACILITY, SHERIFF TIMOTHY HOWARD, and CHIEF TIMOTHY
LOVE honor and pay the claim on behalf of JUSTIN COSTANTINO.

DATED: Buffalo, New York
April 27, 2011



JUSTIN COSTANTINO

(VERIFICATION ATTACHED)

VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

JUSTIN COSTANTINO, being duly sworn, deposes and says:

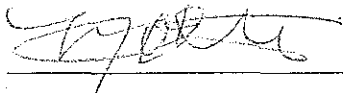
That deponent is the claimant in the within action; that deponent has read the foregoing Notice of Claim and knows the contents thereof; that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters, deponent believes it to be true.



JUSTIN COSTANTINO

Sworn to before me this

27 day of APRIL, 2011.



Nicholas C. Costantino Esq.
Notary Public, State of NY
Qualified in Erie Co.
My Comm Exp. 7/30/14



COUNTY OF ERIE

JEREMY A. COLBY
ERIE COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MARTIN A. POLOWY
FIRST ASSISTANT COUNTY ATTORNEY

THOMAS F. KIRKPATRICK, JR.
SECOND ASSISTANT COUNTY ATTORNEY

June 14, 2011

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	<i>Miles, Roger vs Donald Livingston</i>
Document Received:	letter
Name of Claimant:	Roger Miles ICN #41146 c/o Erie County Correctional Facility 11581 Walden Avenue Alden, New York 14004
Claimant's attorney:	Pro Se

Should you have any questions, please call.

Very truly yours,

JEREMY A. COLBY
Erie County Attorney

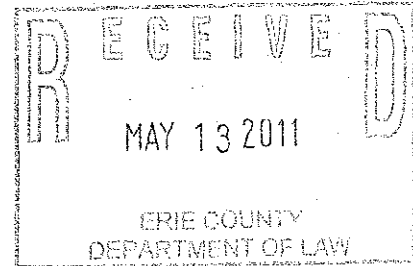
By: 
THOMAS F. KIRKPATRICK, JR.
Second Assistant County Attorney

TFK/mow
Enc.

cc: JEREMY A. COLBY, Erie County Attorney

Tfk

Roger Miles 41146
E.C.C.F.
11581 Walden Ave.
Alden, N.Y. 14004



Robert M. Goldstein
Attorney At Law
438 Main Street, Suite 225

Re: Miles vs Donald Livingston
Index No. I-2006-3587

Buffalo, N.Y. 14202
Erie County Attorney
95 Franklin Street
Buffalo, N.Y. 14202

Dear Sirs:

I am falsely and unlawfully imprisoned here at Erie County Correctional Facility on a parole declaration of delinquency and warrant based upon felony complaints of 2/30/96 and parole violation charges of 2/15/96.

This is a matter of record of Erie County Sheriff's Office, Erie County Holding Center, Erie County Correctional Facility, Erie County District Attorney's Office and Erie County Probation Department.

On March 15, 1996 I was declared delinquent by Parole Board Member Kenneth Graber based upon parole violation report charge number 2 which reads as follows:

In violation of Rule #11 of the conditions of his release, the subject on 1/30/96 did have in his possession and under his control a quantity of cocaine when arrested by Amherst P.D. at 3630 Main Street, Amherst, N.Y..

I was given 15 years delinquent time by parole on an allege automatic parole violation for a conviction of parole violation charge #2 and sentence by Justice Joseph S. Forma on June 13, 1997.

On June 13, 1996 Justice Sheila DiTullio Ruled in relation to my October 9, 1996 suppression hearing under Indictment #96-0286: That Amherst Lt. John Askey stopped my vehicle after leaving the parking lot at 3630 Main St., Amherst, N.Y. and arrested me. **(in Buffalo, there is no felony complaint for this arrest)**. Thereafter, cocaine and heroin was found by **Officer Daniel Lubick** after a strip search of my person in a cellblock area of **Amherst Police Department** (see enclosed decision by Justice DiTullio p.p. 28-29 and 32)

On April 9, 1997 I plead guilty before Justice Joseph S. Forma. The plea involved an offence in which on 1/30/96, at 5:25 p.m. (see DiTullio's decision p. 28-29 and pre-sentence investigation report p 7-8)

On June 13, 1997 Justice Forma sentence me to 3 to 6 years. People v Miles, 265 AD2d 867 [4th Dept 1999] lv. Den. 94 Ny2d 923 [2000] (see sentence commitment June 13, 1997).

By Decision and Order dated September 8, 1997 Oneida County Justice John L. Murad Ruled in ex. rel. Miles v Hollins, Superintendent of Oneida Correctional Facility, Petitioner alleged that he had been illegally sentenced as a predicate felon on June 13, 1997, when Justice Forma imposed a three to six year sentence of incarceration, consecutive to a fourteen year sentence remaining on a prior conviction. He had not appealed. This was based on the arrest in Buffalo by Lt. John Askey

By Decision and Order dated September 24, 1997, ex. rel. Miles v Costello, Superintendent of Med-State Correctional Facility, Index No. 97-2488, Justice Murad Decided: Petitioner again seek a Writ of Habeas Corpus, but this time he is challenging the legality of the parole probable cause finding made on February 26, 1997 (1996). He was violated for having possessed cocaine when he was arrested on the various narcotics, among which he was convicted and sentence by Justice Forma. **This was for the alleged arrest at 3630 Main Street Amherst, N.Y. on 1/30/96.**

Justice Murad, erroneously ruled I was convicted twice before justice Forma on June 13, 1997 for the arrest in Buffalo by Lt. Askey and of parole violation charge #2, that I was charged with in the parole violation report of February 12, 1996.

Justice's Murad, O'Donnell and Wolfgang's Decisions are collaterally estopped. See Matter of Josey v Good, 9 NY3d 389 [2007] and O'Brian v City of Syracuse, 54 NY2d 353, 357 [1981]

There was no felony complaint filed on January 30, 1996 with this charge in the Amherst Town Court for an arrest at **3630 Main Street Amherst, N.Y. for possession of additional cocaine on January 30, 1996.** The felony charges file on 1/30/96 where terminated on June 24, 1994 and the Erie County Sheriff was ordered to release me by Justice Sam Maislin. (see enclosed grand jury testimony by Amherst Police Officer Daniel Lubick, termination Order by Justice Maislin dated 6/24/96 and pre-sentence investigation report).

Parole argued and Justice's O'Donnell and Wolfgang in their Decisions Ruled that I was given an automatic parole violation on the false parole violation charge #2 for which there was never any prosecution. Parole Officer Luther Burns manufactured this charge.

My 1982 sentence was never legally interrupted with a legal declaration of delinquency or by operation of any law. My 1982 sentence was running concurrent with the unlawful parole and 1997 sentence and those illegal sentences have long since expired.

I should be credited with more that 30 years jail and parole jail time which will satisfy any new sentence I may receive. I request my immediate release from this false and unlawful incarceration.

Dated: May 11, 2011

Sincerely yours

AFFIDAVIT OF SERVICE
Postal Service

State of New York)
County of Erie) SS:
)

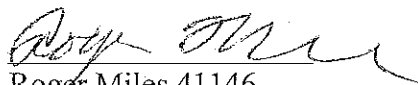
I Roger Miles, being duly sworn, deposes and says that I have on this 10 day of May, 2011, forwarded via the United States Postal Service copies of the following documents:

Grand jury testimony of Daniel Lubick, termination order dated 6/24/96 by Justice Maislin, probation report, parole violation warrants 2/12/96, 9/14/10, violation of release report dated 2/15/96, declaration of delinquency dated 3/15/96 decisions by Justices O'Donnell and Wolfgang 1-2006-3587 and 1-2001-5541 to the offices of:

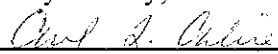
Robert Goldstein
438 Main Street, Suite 225
Buffalo, N.Y. 14202

County Attorney
Erie County
95 Franklin Street
Buffalo, N.Y. 14202

Dated May 10, 2011


Roger Miles 41146

Sworn to before me this
10 day of May, 2011


Notary Public *Carol L. Calme*

3/30/14



COUNTY OF ERIE

JEREMY A. COLBY
ERIE COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MARTIN A. POLOWY
FIRST ASSISTANT COUNTY ATTORNEY

THOMAS F. KIRKPATRICK, JR.
SECOND ASSISTANT COUNTY ATTORNEY

June 14, 2011

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	<i>Curto, Patricia vs Erie County Clerk's Office, Patricia L. Fulwiler, Kathy Hochul and Erie County</i>
Document Received:	Notice of Claim
Name of Claimant:	Patricia J. Curto 20 Hazel Court Orchard Park, New York
Claimant's attorney:	Pro Se

Should you have any questions, please call.

Very truly yours,

JEREMY A. COLBY
Erie County Attorney

By: 
THOMAS F. KIRKPATRICK, JR.
Second Assistant County Attorney

TFK/mow
Enc.

cc: JEREMY A. COLBY, Erie County Attorney

TO:

Erie County Clerk's Office
92 Franklin Street, Buffalo, New York 14202

TO:

Patricia L. Fulwiler
92 Franklin Street, Buffalo, New York 14202

TO:

Kathy Hochul
92 Franklin Street, Buffalo, New York 14202

TO:

Erie County c/o Erie County Executive Collins
95 Franklin Street, Buffalo, New York 14202

PLEASE TAKE NOTICE that I, Patricia J Curto, pursuant to the statute in such cases made and provided, do hereby claim and demand of and from Patricia L. Fulwiler, Kathy Hochul, the Erie County Clerk's Office and its agents and/or servants and/or employees and/or alter egos, Erie County and its agents and/or servants and/or employees and/or alter egos, and such others as may be liable; on behalf of myself for compensation and damages sustained by me individually by and through the negligence; and/or the malicious, willful disregard of Patricia J Curto's rights, intentional and wrongful acts and/or conduct of Patricia L. Fulwiler, Kathy Hochul, the Erie County Clerk's Office and its agents and/or servants and/or employees and/or alter egos, Erie County and its agents and/or servants and/or employees and/or alter egos, and such others as may be liable; with the knowledge of officers/officials of facts constituting claim; and in support of such claims do state the following:

I reside at No. 20 Hazel Court in the Town of Orchard Park, County of Erie and State of New York

Between March 21, 2011 and March 25, 2011, upon information and belief Erie County Clerk Office employee Patricia L. Fulwiler was the Erie County Deputy Clerk.

At some time between March 21, 2011 and March 25, 2011 Erie County Clerk Office employee Patricia L. Fulwiler decided litigants who had been granted permission (motion) to proceed as a poor person in an action, in court's which the Erie County Clerk collected fees (including but not limited to court filing fees), where now required to pay such fee(s) in the action. Previously litigants who had been granted poor person in the NY State Unified Court System where not required by the CPLR and therefore the Erie County Clerk's Office from paying fee(s) including but not limited to filing fees.

Article 11. Poor Persons/CPLR§ 1102 (d) Privileges of poor person, states a poor person does not pay fees.

The decision of Erie County Clerk Office employee Patricia L. Fulwiler, cited above, was appealed by Patricia J. Curto in writing to Kathy Hochul Erie County Clerk, mailed on March 25, 2011 and received on or about March 26, 2011 by Kathy Hochul. No acknowledgement or response has been received by Patricia J Curto. Therefore Patricia J Curto's appeal has been constructively denied and it is the continuing policy to require the payment of fees to the Erie County Clerk's Office by litigants in action where they have been granted poor person.

Patricia L. Fulwiler, Kathy Hochul, the Erie County Clerk's Office and its agents and/or servants and/or employees and/or alter egos, Erie County and its agents and/or servants and/or employees and/or alter egos, and such others as may be liable; decision(s), continuing policy and/or practice cited above; are made in violation of lawful procedure, and/or was arbitrary and capricious and/or an abuse of authority and/or lack of authority, and there was no legal and factual basis.

Actions and conduct of Patricia L. Fulwiler, Kathy Hochul, the Erie County Clerk's Office and its agents and/or servants and/or employees and/or alter egos, Erie County and its agents and/or servants and/or employees and/or alter egos, and such others as may be liable cited herein constitute: negligent hiring, retention, training and supervision.

The actions and conduct cited herein willfully maliciously and with reckless disregard: violated the rights secured to Patricia Curto by the federal and NY State Constitution, and State and federal law; violated Patricia Curto's civil rights under New York State statute and federal statute.

The conduct and actions cited herein, were for the purpose and/or the natural consequence of which was to harass, discriminate, intimidate, coerce, retaliate, oppress, terrorize, embarrass and abuse Curto.

The acts, continuing practices and/or continuing policies cited above were done with malicious, intentional, willful, reckless, wanton and negligent disregard for Patricia Curto's rights and with the purpose of harassing, discriminating, intimidating, coercing, retaliating, oppressing, terrorizing, and abusing Patricia Curto.

As a result of the actions and conduct cited herein, Patricia Curto has sustained damages including but not limited to: out-of-pocket expenses; physical, emotional and mental pain and anguish; and she will continue to suffer same for an indefinite time in the future, all to her great detriment and loss.

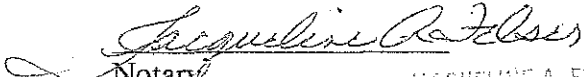
Patricia Curto has and continues to suffer emotional distress and mental anguish such as, including but not limited to: upset, fear, sleeplessness, anxiety, shock, anger, confusion, frustration, and pain, as a result of illegal actions and conduct cited herein.

That upon your failure to pay such claim within the statutory period provided therefore, it is the intention of the claimant to commence an action against of Patricia L. Fulwiler, Kathy Hochul, the Erie County Clerk's Office and its agents and/or servants and/or employees and/or alter egos, Erie County and its agents and/or servants and/or employees and/or alter egos, and such others as may be liable therefore to recover the legal expenses, injuries and damages sustained by this claimant in the amount of fifteen

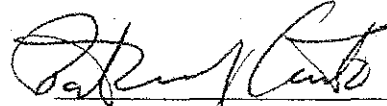
thousand dollars.

WHEREFORE, this claimant respectfully requests that this, her claim, be adjusted and paid as provided by law in the amount of fifteen thousand dollars.

Sworn to before me this 10th day
Of May 2011


Notary

Jacqueline A. FELSER
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ERIE COUNTY
My Commission Expires 8/21/2013



Patricia J Cufio
20 Hazel Ct.
W. Seneca, NY 14224

VERIFICATION

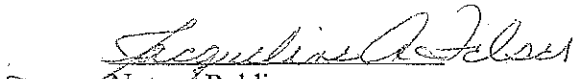
STATE OF NEW YORK)
COUNTY OF ERIE) ss:

PATRICIA J. CURTO, being duly sworn, deposes and says:

I am familiar with the facts and circumstances set forth in the foregoing Notice of Claim. I have read the foregoing Notice of Claim and know the contents thereof; the same is true to my own knowledge, except as to those matters stated upon information and belief, which are believed to be true.


Patricia J. Curto

Sworn to before me this
10th day of May, 2011


Notary Public

JACQUELINE A. FELSER
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ERIE COUNTY
My Commission Expires 8/21/2013



COUNTY OF ERIE

JEREMY A. COLBY
ERIE COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MARTIN A. POLOWY
FIRST ASSISTANT COUNTY ATTORNEY

THOMAS F. KIRKPATRICK, JR.
SECOND ASSISTANT COUNTY ATTORNEY

June 14, 2011

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	<i>Miles, Mildred L. and William G. vs ECMC, Elizabeth D. DiTonto, M.D. and County of Erie</i>
Document Received:	Notice of Claim
Name of Claimant:	Mildred L. Miles 398 Broadway Avenue Buffalo, New York 14204
Claimant's attorney:	Benjamin J. Andrews, Esq. Andrews, Bernstein & Maranto, LLP

Should you have any questions, please call.

Very truly yours,

JEREMY A. COLBY
Erie County Attorney

By: 
THOMAS F. KIRKPATRICK, JR.
Second Assistant County Attorney

TFK/mow
Enc.

cc: JEREMY A. COLBY, Erie County Attorney

MILDRED L. MILES and
WILLIAM G. MILES, Individually and
as Wife and Husband
398 Broadway Avenue
Buffalo, New York 14204-1546,

Claimants

NOTICE OF CLAIM

-vs-

ERIE COUNTY MEDICAL CENTER
462 Grider Street
Buffalo, New York 14215

ELIZABETH D. DITONTO, M.D.
462 Grider Street
Buffalo, New York 14215

COUNTY OF ERIE
Department of Law
95 Franklin Street, Room 1634
Buffalo, New York 14202

Respondents

PLEASE TAKE NOTICE, that the claimants, MILDRED L. MILES and WILLIAM G. MILES, have and hereby intend to file a claim against the ERIE COUNTY MEDICAL CENTER, ELIZABETH D. DITONTO, M.D., and COUNTY OF ERIE and in support of said claim state the following:

1. The Post Office address of the claimants, MILDRED L. MILES and WILLIAM G. MILES, is 398 Broadway Avenue, Buffalo, New York 14204.

2. The attorneys for the claimants are Benjamin J. Andrews, Esq., Andrews, Bernstein & Maranto, LLP, 69 Delaware Avenue, Suite 1200, Buffalo, New York 14202.

3. The claim arose as follows: On or about March 9, 2011, claimant, Mildred L. Miles, received an epidural injection from Dr. Elizabeth D. Ditonto at the Erie County Medical Center, located at 462 Grider Street, Buffalo, New York. On information and belief, the needle used for the injection was contaminated and introduced bacteria into claimant's spine and system, and/or the procedure utilized for the injection introduced bacteria into claimant's spine and system and/or the healthcare employees of the hospital including Dr. Elizabeth D. Ditonto who were involved with the injection introduced bacteria into claimant's spine and system.

4. Upon information and belief, Dr. Elizabeth D. Ditonto was and is an employee of the Erie County Medical Center and was acting within the scope of her duties on behalf of the hospital when she administered the epidural injection.

5. The claim of Mildred L. Miles is for personal injuries, pain, and suffering, including, without limitation, seizures, visual problems, disorientation, memory loss, weakness, headaches, and sensitivity to noise and light resulting from bacterial meningitis.

6. Claimant, William G. Miles, has a derivative claim for the loss of society, services and companionship of claimant, Mildred L. Miles.

7. Upon information and belief, the incident herein described and the resultant injuries and damages sustained were caused as a result of the negligence, carelessness and recklessness on the part of the agents, servants, and/or employees of the Erie County Medical Center including Dr. Elizabeth D. DiTonto.

WHEREFORE, claimants request that the ERIE COUNTY MEDICAL CENTER, ELIZABETH
D. DITONTO, M.D. and COUNTY OF ERIE, compensate them for their injuries.

DATED: Buffalo, New York
June 6, 2011

Yours, etc.,

BY:



Benjamin J. Andrews, Esq.

ANDREWS, BERNSTEIN & MARANTO, LLP

Attorneys for Claimants

Office and Post Office Address

69 Delaware Avenue, Suite 1200

Buffalo, New York 14202

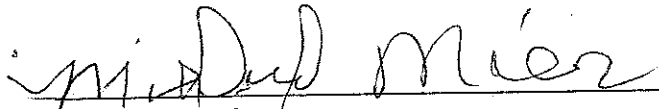
Telephone: (716) 842-2200

VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE)
CITY OF BUFFALO)

SS:

MILDRED L. MILES, being duly sworn, says: I am the claimant above named; I have read the foregoing notice of intention to file a claim and know its contents; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true.


Mildred L. Miles

Sworn to before me this
6th day of June, 2011.


Notary Public

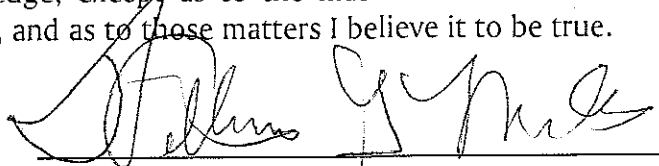
PAMELA A. BURKHARD
Notary Public, State of New York
Qualified in Erie County
My Commission Expires September 25, 2013

VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE)
CITY OF BUFFALO)

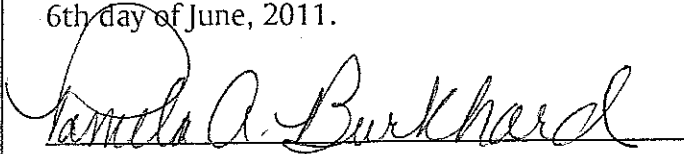
SS:

WILLIAM G. MILES, being duly sworn, says: I am the claimant above named; I have read the foregoing notice of intention to file a claim and know its contents; the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true.



William G. Miles

Sworn to before me this
6th day of June, 2011.



Notary Public

PAMELA A. BURKHARD
Notary Public, State of New York
Qualified in Erie County
My Commission Expires September 25, 2013



COUNTY OF ERIE

JEREMY A. COLBY
ERIE COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MARTIN A. POLOWY
FIRST ASSISTANT COUNTY ATTORNEY

THOMAS F. KIRKPATRICK, JR.
SECOND ASSISTANT COUNTY ATTORNEY

June 14, 2011

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	<i>Trimper, Mary B. vs Erie County, Department of Social Services</i>
Document Received:	Div of Human Rights Charge of Discrim
Name of Claimant:	Mary B. Trimper 56 Berkley Place Buffalo, New York 14209
Claimant's attorney:	Tasha E. Moore New York State Division of Human Rights - Buffalo 65 Court Street, Suite 506 Buffalo, New York 14202

Should you have any questions, please call.

Very truly yours,

JEREMY A. COLBY
Erie County Attorney

By: 
THOMAS F. KIRKPATRICK, JR.
Second Assistant County Attorney

TFK/mow
Enc.



ANDREW M. CUOMO
GOVERNOR

NEW YORK STATE
DIVISION OF HUMAN RIGHTS

NEW YORK STATE DIVISION OF
HUMAN RIGHTS on the Complaint of

MARY B. TRIMPER,

Complainant,

v.

ERIE COUNTY, DEPARTMENT OF SOCIAL
SERVICES,

Respondent.

VERIFIED COMPLAINT
Pursuant to Executive
Law, Article 15

Case No.
10148933

Federal Charge No. 16GB103411

I, Mary B. Trimper, residing at 56 Berkley Place, Buffalo, NY, 14209, charge the above named respondent, whose address is 95 Franklin Street, Buffalo, NY, 14202-3959 with an unlawful discriminatory practice relating to employment in violation of Article 15 of the Executive Law of the State of New York (Human Rights Law) because of sex, race/color.

Date most recent or continuing discrimination took place is 5/24/2011.

The allegations are:

1. I am a White female. Because of this, I have been subject to unlawful discriminatory actions.
2. I was hired by Respondent on August 28, 1978 and currently hold the job title of social case supervisor.
3. Since she was hired in July 2010, Assistant Commissioner Vastye Gillespie has consistently subjected me, as well as other White females, to disparate treatment.
4. For example on May 2, 2011, upon my return from Worker's Compensation leave, Ms. Gillespie deprived me of my grade 12 administrative duties and office, on May 19, 2011, she changed

my title on the staff phone listing to a lower civil service title that I do not hold, on May 24, 2011, she denied me training which is mandatory for mid managers, on May 4, 2011, she gave me duties in which I have no experience and which are in a civil service line that I've never been part of. Similarly situated male and or Black managers are not treated in like manner.

5. In late 2010 or early 2011, Ms. Gillespie promoted Frances Schunk, male, over Stacy Greenan, female, who held the provisional appointment and had more seniority and a better work record than Mr. Schunk. In May 2011, Ms. Gillespie gave Wendy Martin a failing grade on probation and gave the position to Christopher Anderson, male.

Based on the foregoing, I charge respondent with an unlawful discriminatory practice relating to employment because of sex, race/color, in violation of the New York State Human Rights Law (Executive Law, Article 15), Section 296.

I also charge the above-named respondent with violating Title VII of the Civil Rights Act of 1964, as amended (covers race, color, creed, national origin, sex relating to employment). I hereby authorize SDHR to accept this verified complaint on behalf of the U.S. Equal Employment Opportunity Commission (EEOC) subject to the statutory limitations contained in the aforementioned law(s).

I have not commenced any other civil action, nor do I have an action pending before any administrative agency, under any state or local law, based upon this same unlawful discriminatory practice.


Mary B. Trimper

STATE OF NEW YORK)
COUNTY OF) SS:

Mary B. Trimper, being duly sworn, deposes and says: that he/she is the complainant herein; that he/she has read (or had read to him or her) the foregoing complaint and knows the content thereof; that the same is true of his/her own knowledge except as to the matters therein stated on information and belief; and that as to those matters, he/she believes the same to be true.

Mary B. Trimper
Mary B. Trimper

Subscribed and sworn to
before me this 3 day
of June, 2011.

Beverly A. Frescholtz
Signature of Notary Public

BEVERLY A. FRESCHOLTZ
Notary Public, State of New York
Qualified in Erie County
No. 01FR6187237
Commission Expires on May 19, 2012



COUNTY OF ERIE

JEREMY A. COLBY
ERIE COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MARTIN A. POLOWY
FIRST ASSISTANT COUNTY ATTORNEY

THOMAS F. KIRKPATRICK, JR.
SECOND ASSISTANT COUNTY ATTORNEY

June 14, 2011

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	<i>White, Robin vs County of Erie</i>
Document Received:	Notice of Claim
Name of Claimant:	Robin White 1826 Kenmore Avenue Buffalo, New York 14216
Claimant's attorney:	Gary A. Joseph, Esq. Sarles, Frey & Joseph 5800 Main Street Williamsville, NY 14221

Should you have any questions, please call.

Very truly yours,

JEREMY A. COLBY
Erie County Attorney

By: 

THOMAS F. KIRKPATRICK, JR.
Second Assistant County Attorney


TFK/mow
Enc.

cc: JEREMY A. COLBY, Erie County Attorney

NOTICE OF CLAIM

TO: THE COUNTY OF ERIE

This paper received at the
Erie County Attorney's Office
from Team Czora on
the 16th day of May, 2011
at 11:22 a.m./p.m.

 ANTHONY C. MARTELLETTI

ROBIN WHITE, residing at 1826 Kenmore Avenue, ~~Apartment B, Buffalo, New~~
York, 14216, by and through her attorneys, Sarles, Frey & Joseph, 5800 Main
Street, Williamsville, New York 14221, respectfully shows:

1. That on February 25, 2011 at approximately 2:00 P.M., ROBIN WHITE entered an elevator located on the first floor of the Edward A. Rath County Office Building, 95 Franklin Street, Buffalo, New York 14202, with the intention of traveling from the first floor up to the third floor where she was going to apply for food stamps through the Erie County Department of Social Services.
2. The elevator the Claimant entered was the southern most of three elevators located on the first floor of the Edward A. Rath County Office Building, south of a ceiling sign entitled "Erie County Works Center" and west of the building entrance entitled "Erie County Department of Social Services, 158 Pearl Street". The specific elevator the Claimant entered is depicted with an "X" on each of the photographs attached hereto as Exhibit "A" and made a part hereof.
3. After entering the subject elevator, the Claimant rode the elevator up to the third floor as intended. Once the elevator reached the third floor, the elevator doors opened. At that time, the elevator floor was

positioned approximately 3-4 inches below the floor level of the third floor of said building.

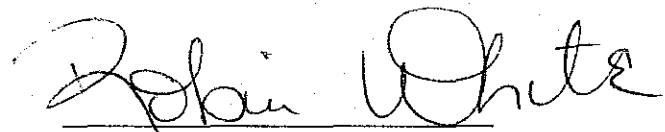
4. As the Claimant exited the elevator in an easterly direction, her left foot caught on the rise between the floor level and the elevator floor causing the Claimant to trip and fall forward out of the elevator and onto the third floor.
5. As a result of said fall, Robin White suffered multiple serious injuries including, but not limited to injuries to her right knee, left knee, low back, neck, right shoulder and left shoulder all of which have left her with permanent injuries, the extent of which are still to be determined.
6. At the time of this incident, the County of Erie was the owner and operator of the Edward A. Rath County Office Building and as such, was responsible for operating, maintaining, inspecting, and repairing said building including, but not limited to the subject elevator.
7. The incident described above was caused by and through the negligence of the County of Erie, its agents, servants and/or employees in that the County of Erie did not take all adequate and necessary steps to provide for the safety of the Claimant. That specifically, the County of Erie, its agents, servants and/or employees negligently operated, inspected, repaired and/or maintained the elevator the Claimant was exiting at the time of this incident; negligently allowed said elevator to function in a way that was not fit for the purpose it

was intended for; negligently allowed a dangerous condition to exist with regard to said elevator knowing that individuals such as the Claimant would be exiting the elevator; failed to use all reasonable care to protect individuals known to use said elevator; failed to properly care for, maintain, repair, and inspect said elevator described above so as to make the same safe for travel; failed to properly inspect said elevator; failed to properly maintain said elevator; failed to properly repair said elevator; encouraged individuals such as the Claimant to use said elevator knowing that a dangerous condition existed thereon; failed to take any and all steps necessary to rectify the dangerous and unsafe condition which existed with regard to the elevator and which caused the Plaintiff to fall, which condition had existed for a considerable length of time prior to the date of this incident and/or which had been made known to the County of Erie, its agents, servants and/or employees; failed to warn the claimant of the dangerous and hazardous condition that existed with regard to the said elevator; and otherwise failed to act in a manner so as to safeguard the Claimant.

8. That the Claimant has treated with and continues to treat with her doctors, has incurred and continues to incur various medical bills and has been and continues to be unable to work as a result of this incident.

9. That the Claimant, ROBIN WHITE, hereby makes claim against the County of Erie for her personal injuries, the permanency incurred as a result thereof, her pain and suffering, medical expenses, lost wages, and all other expenses that have been incurred in the past and for all future expenses that will be incurred.

PLEASE TAKE NOTICE, that ROBIN WHITE intends to commence an action for her personal injuries, pain and suffering, expenses and lost wages as set forth above if the above claim is not adjusted. That all of the above allegations herein have been given upon information and belief.


ROBIN WHITE

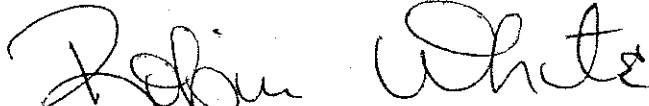
Sworn to before me this
14th day of May, 2011


NOTARY PUBLIC

GARY ALAN JOSEPH
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ERIE COUNTY
My Commission Expires March 30, 2015

STATE OF NEW YORK)
COUNTY OF ERIE) ss:

ROBIN WHITE being duly sworn, deposes and says that she is the Claimant in the within action; that she has read the foregoing Notice of Claim and knows the contents thereof; that the same is true to the knowledge of deponent, except as to the matters therein stated to be alleged on information and belief, and that as to those matters he believes it to be true.



ROBIN WHITE

Sworn to before me this
1st day of May, 2011



NOTARY PUBLIC

GARY ALAN JOSEPH
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN ERIE COUNTY
My Commission Expires March 30, 2015



COUNTY OF ERIE

JEREMY A. COLBY
ERIE COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MARTIN A. POLOWY
FIRST ASSISTANT COUNTY ATTORNEY

THOMAS F. KIRKPATRICK, JR.
SECOND ASSISTANT COUNTY ATTORNEY

June 14, 2011

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	<i>Kelly, David vs County of Erie</i>
Document Received:	Notice of Claim
Name of Claimant:	David Kelly ICN 098359 c/o Erie County Holding Center 40 Delaware Avenue Buffalo, New York 14202
Claimant's attorney:	Pro Se

Should you have any questions, please call.

Very truly yours,

JEREMY A. COLBY
Erie County Attorney

By: 
THOMAS F. KIRKPATRICK, JR.
Second Assistant County Attorney

TFK/mow
Enc.

cc: JEREMY A. COLBY, Erie County Attorney

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

=====X

Claimant,

David Kelly

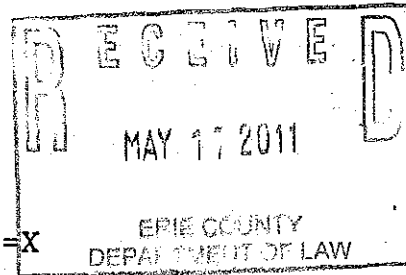
NOTICE OF CLAIM

- vs -

THE COUNTY OF ERIE,

Defendant.

=====X



TO: COUNTY OF ERIE
DEPARTMENT OF LAW
95 Franklin Street / Room 1634
BUFFALO, NEW YORK 14202

PLEASE TAKE NOTICE that David Kelly, hereby
claims and demands, pursuant to §50-e of the General Municipal Law,
damages against the COUNTY OF ERIE for damages sustained by Claimant
by reason of the wrongful, unlawful, negligent and careless acts and
omissions of the COUNTY OF ERIE, its agents, servants or employees;
and in support thereof, the Claimant states:

1. The name and post office address of the claimant is:
098359 40 Delaware Buffalo, NY 14202
2. This claim is for damages sustained by the Claimant while
he was an inmate at the Erie County Holding Center, 40 Delaware Avenue,
Buffalo, New York 14202-3999.

3. The wrongful, unlawful, negligent and careless acts and omissions of the COUNTY OF ERIE, its agents, servants or employees, occurred as follows:

My boots that I come to jail in was sent to the front lobby with the rest of my Property. I found this out when I went to Court, back in July, 2010. I wasn't told why, I only was told there was a note in my bag that said where my boots been sent. Once I was done with Court and Sentence I signed my Property over to my family and they didn't receive my boots. They were given to Joseph Russell of 205 Comstock which is my brother, on May 2nd.

4. Take further notice that claimant demands payment of his claim, and unless the claim is paid within a reasonable amount of time, and unless the claim is paid within a reasonable amount of time, it is the intention of the claimant to commence a lawsuit against the COUNTY OF ERIE to recover sums claimed as to the damages and injuries sustained by them.

David Kelly
CLAIMANT

VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE) ss.;
CITY OF BUFFALO)

David Kelly, being duly sworn, deposes
and says that he is the claimant in the within proceeding and has read
the foregoing Notice of Claim and knows the contents of same to be
true to his own knowledge, save those matters therein alleged upon
information and belief, and as to those matters, the same he believes
to be true.

David Kelly

Sworn to before me this 13
day of May 2011

Sylvia M. O'Neal
Notary Public

SYLVIA M. O'NEAL
COMMISSIONER OF DEEDS
In and For the City of Buffalo, Erie County, NY
My Commission Expires Dec. 31, 2012



COUNTY OF ERIE

JEREMY A. COLBY
ERIE COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MARTIN A. POLOWY
FIRST ASSISTANT COUNTY ATTORNEY

THOMAS F. KIRKPATRICK, JR.
SECOND ASSISTANT COUNTY ATTORNEY

June 14, 2011

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	<i>Bulow, Shawn C., et al. vs County of Erie, Chief John Rodriguez and Erie County Health Department</i>
Document Received:	Notice of Claim
Name of Claimant:	Shawn C. Bulow 66 Bonita Drive Depew, New York 14043
Claimant's attorney:	Pro Se

Should you have any questions, please call.

Very truly yours,

JEREMY A. COLBY
Erie County Attorney

By: 

THOMAS F. KIRKPATRICK, JR.
Second Assistant County Attorney

TFK/mow
Enc.

cc: JEREMY A. COLBY, Erie County Attorney

TK
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

=====X

Shawn C. Bulow, et al
19714

Claimant,

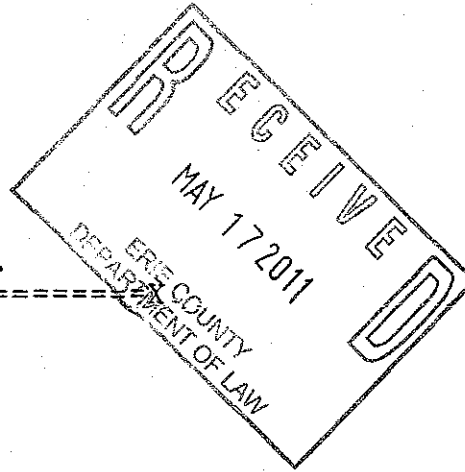
NOTICE OF CLAIM

- VS -

THE COUNTY OF ERIE,

Chief John Rodriguez,
Erie County Health Dept.

Defendant.



TO: COUNTY OF ERIE
DEPARTMENT OF LAW
95 Franklin Street / Room 1634
BUFFALO, NEW YORK 14202

PLEASE TAKE NOTICE that Shawn Bulow, hereby claims and demands, pursuant to §50-e of the General Municipal Law, damages against the COUNTY OF ERIE for damages sustained by Claimant by reason of the wrongful, unlawful, negligent and careless acts and omissions of the COUNTY OF ERIE, its agents, servants or employees; and in support thereof, the Claimant states:

1. The name and post office address of the claimant is:
66 Bonita Dr. Depew, New York 14043
2. This claim is for damages sustained by the Claimant while he was an inmate at the Erie County Holding Center, 40 Delaware Avenue, Buffalo, New York 14202-3999.

3. The wrongful, unlawful, negligent and careless acts and omissions of the COUNTY OF ERIE, its agents, servants or employees, occurred as follows: The careless act, negligence by medical staff from March 23, 2011 to present date. Inmate Bulow was given a TB shot on 3-23-2011 & (never) to date was read & did not put in sick-call slips; \$2000⁰⁰.

In April of 2011 inmate blood was seen by medical on abnormal blood pressure was supposed to be on weekly. Then on 4-25-11 pressure of B/P was 170/99 and was told once again about pills; so PA (NP) placed on weekly & to NO Avail Blood pressure was not read weekly. Once again B/P was high May 2011, instead of pills "I" recommended low salt diet & 7 day blood screen. Of course still didn't happen until grievance placed & work of negligent & careless #11-048 (Grievance) Delay in treatment, Ignoring obvious condition, failure to provide treatment for diagnosed condition by PA (NP). Interference with access to treatment of Hypertension all the instructions prescribed written in instruction 8th Amendment, Estelle v. Lombardi: Judgment request of this 3000⁰⁰ total \$5000⁰⁰ Because of negligence could of resulted in death of Delay in treatment

4. Take further notice that claimant demands payment of his claim, and unless the claim is paid within a reasonable amount of time, and unless the claim is paid within a reasonable amount of time, it is the intention of the claimant to commence a lawsuit against the COUNTY OF ERIE to recover sums claimed as to the damages and injuries sustained by them.


CLAIMANT

VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE) ss.;
CITY OF BUFFALO)

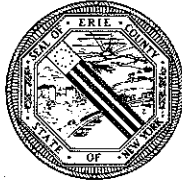
Shawn Bulon, being duly sworn, deposes and says that he is the claimant in the within proceeding and has read the foregoing Notice of Claim and knows the contents of same to be true to his own knowledge, save those matters therein alleged upon information and belief, and as to those matters, the same he believes to be true.

Shawn Bulon

Sworn to before me this 13
day of May 2011.

Sylvia M. O'Neal
Notary Public

SYLVIA M. O'NEAL
COMMISSIONER OF DEEDS
In and For the City of Buffalo, Erie County, NY
My Commission Expires Dec. 31, 2012



COUNTY OF ERIE

JEREMY A. COLBY
ERIE COUNTY ATTORNEY

CHRIS COLLINS
COUNTY EXECUTIVE
DEPARTMENT OF LAW

MARTIN A. POLOWY
FIRST ASSISTANT COUNTY ATTORNEY

THOMAS F. KIRKPATRICK, JR.
SECOND ASSISTANT COUNTY ATTORNEY

June 14, 2011

Mr. Robert M. Graber, Clerk
Erie County Legislature
92 Franklin Street, 4th Floor
Buffalo, New York 14202

Dear Mr. Graber:

In compliance with the Resolution passed by the Erie County Legislature on June 25, 1987, regarding notification of lawsuits and claims filed against the County of Erie, enclosed please find a copy of the following:

File Name:	<i>Bowser, George A. Jr. vs County of Erie</i>
Document Received:	Notice of Claim
Name of Claimant:	George A. Bowser, Jr. ICN #3707 c/o Erie County Holding Center 40 Delaware Avenue Buffalo, New York 14202
Claimant's attorney:	Pro Se

Should you have any questions, please call.

Very truly yours,

JEREMY A. COLBY
Erie County Attorney

By: 

THOMAS F. KIRKPATRICK, JR.
Second Assistant County Attorney

TFK/mow
Enc.

cc: JEREMY A. COLBY, Erie County Attorney

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ERIE

Claimant,

Mr. George A. Bowser Jr.

- vs -

THE COUNTY OF ERIE,

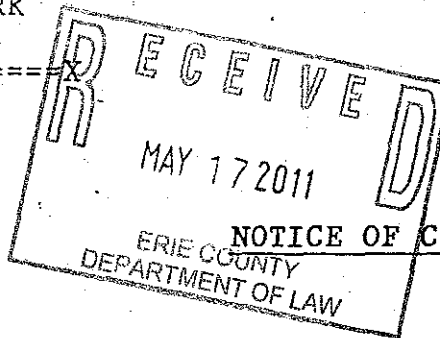
Defendant.

=====X

TO: COUNTY OF ERIE
DEPARTMENT OF LAW
95 Franklin Street / Room 1634
BUFFALO, NEW YORK 14202

PLEASE TAKE NOTICE that Mr. George A. Bowser Jr., hereby claims and demands, pursuant to §50-e of the General Municipal Law, damages against the COUNTY OF ERIE for damages sustained by Claimant by reason of the wrongful, unlawful, negligent and careless acts and omissions of the COUNTY OF ERIE, its agents, servants or employees; and in support thereof, the Claimant states:

1. The name and post office address of the claimant is:
2. This claim is for damages sustained by the Claimant while he was an inmate at the Erie County Holding Center, 40 Delaware Avenue, Buffalo, New York 14202-3999.



3. The wrongful, unlawful, negligent and careless acts and omissions of the COUNTY OF ERIE, its agents, servants or employees,

occurred as follows: In the year of 2006 was illegally sentenced by the county courts to a state sentence of land a half to 3 year sentence for a attempted failure to register charge.

In 1988 I was sentenced to a 1 to 3 year sentence/in1995 I was sentenced to a 2 to 4 year sentence/in 2006 I was promised a county year for the charge mentioned above and was lied to with some explanation of a different charge and then sentenced to a 1 an a half to 3 year sentence, this fact was just recently brought to my attention due to the illegalness of this sentence and would like to do something about this matter or for something to be done about it.

Due to the fact that the crime was already done to me and I already did the time I am clueless as to what can be done period.

Though I am truly not happy about this situation!!!!

Due to the fact that I did the whole 3 years and then on top almost caught another charge from a corrections counselor lying to the point where I was sent to a county jail straight from the state prison.

I just want to know what can be done about this problem I am having with this legal situation,or should I say illegal.

4. Take further notice that claimant demands payment of his claim, and unless the claim is paid within a reasonable amount of time, and unless the claim is paid within a reasonable amount of time, it is the intention of the claimant to commence a lawsuit against the COUNTY OF ERIE to recover sums claimed as to the damages and injuries sustained by them.

Mr.George A. Bowser Jr.

CLAIMANT

VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE)
CITY OF BUFFALO)

ss.;

*George Bowser 3707
D-NE-68
40 Delaware ave.
Buffalo, New York 14202-3999*

George Allen Bowser Jr., being duly sworn, deposes and says that he is the claimant in the within proceeding and has read the foregoing Notice of Claim and knows the contents of same to be true to his own knowledge, save those matters therein alleged upon information and belief, and as to those matters, the same he believes to be true.

*George Bowser Jr.
c/c on file*

Sworn to before me this 13
day of May 2011.

Sylvia M. O'Neal
Notary Public

SYLVIA M. O'NEAL
COMMISSIONER OF DEEDS
In and For the City of Buffalo, Erie County, NY
My Commission Expires Dec. 31, 2012