



# 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

December 1, 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>Mugabo, Augustin vs County of Erie</i>
Document Received:	Summons and Complaint
Name of Claimant:	Augustin M. Mugabo 1766 Kenmore Avenue Buffalo, New York 14216
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  
 thomas.kirkpatrick@erie.gov

TFK/mow  
Enc.

cc: JEREMY A. COLBY, Erie County Attorney

This paper received at the  
Erie County Attorney's Office  
from Augustin Mugabo on  
the 30<sup>th</sup> day of Nov, 2011

at 147 a.m./p.m.

**FILED**  
Assistant County Clerk

OCT 18 2011

**ERIE COUNTY  
CLERK'S OFFICE**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ERIE

AUGUSTIN MUGABO

(Names of Plaintiff(s)/Petitioner(s))

VS

COUNTY OF ERIE

(Names of Defendant(s)/Respondent(s))

SUMMONS

Index No. 004186/2011

To the Person(s) Named as Defendant(s) Above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint of the plaintiff(s) herein and to serve a copy of your answer on the plaintiff(s) at the address indicated below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

Dated: 10 18 2011  
(Date of Summons)

AUGUSTIN MUGABO  
(Plaintiff(s) name - person bringing on lawsuit)  
1766 KENMORIS AVENUE  
(Plaintiff(s) street address)  
BUFFALO, NY 14216  
(Plaintiff(s) city, state, zip)  
(716) 268-8026  
(Plaintiff(s) telephone no.)

ERIE COUNTY DEPARTMENT OF HEALTH  
(Defendant(s) name - person(s) sued)  
95 FRANKLIN  
(Defendant(s) street address)  
BUFFALO, NY 14202  
(Defendant(s) city, state, zip)

Venue: Plaintiff(s) designate(s) ERIE County as the place of trial. The basis of this designation is: (Enter County above; then select one category below, listing specific County)

- Plaintiff(s)' Residence in ERIE County.
- Defendant(s)' Residence in ERIE County.
- Other -- Describe: \_\_\_\_\_

NEW YORK STATE SUPREME COURT  
COUNTY OF ERIE

Augustin Mugabo

-----  
Plaintiff

Verified Complaint

Index No.: 004186/2011

v.

County of Erie

-----  
Defendant

**FILED**  
ACTIONS & PROCEEDINGS

OCT 18 2011

ERIE COUNTY  
CLERK'S OFFICE

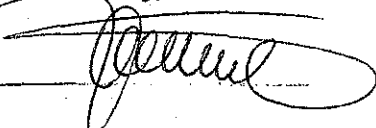
Statement of facts:

- 1) I have lived in Erie County since August of 2001. Shortly after I arrived Crisis Services, Inc., has been targeting me, persecuted me and denied me all the benefits other citizens enjoy, because of my race, color and national origin.
- 2) My current address is 1766 Kenmore Avenue, Buffalo, NY 14216, in the County of Erie.
- 3) Crisis Services, Inc., is a contracting agency in Erie County.
- 4) In the Summer of 2004, I was a college student of Suny Empire State College as well DeVry University Online when Crisis Services Inc., intervened in my private life alleging that I have issues of mental illness. They tormented me, drugged into various mental health institutions for six years and denied me education, employment and a prosperous life I had planned upon completion of my college education. Now that my life is completely destroyed, Crisis Services, Inc., is no longer bothering me. All they wanted was to destroy my future.
- 5) In its operations, Crisis Services, Inc., uses Erie County Social Services State funds to run their operations and long term projects. So they managed to used the County funds in Medicaid reimbursements to institutionalize me as long as they wanted until their mission to destroyed my future was accomplished.
- 6) Crisis Services, Inc., an Erie County agency contractor, with its staff members are working behind the scenes to divide my family, and because of that I have been completely separated from immediate family for eight years because Crisis Services, Inc., wants to use me as a guinea pig in medical research projects. So they have kept me isolated and intimidated to submission.

- 7) Crisis Services, Inc., has members who travel frequently to my to my native countries in East Africa, and that way they have come in contact with some of former colleagues to black mail me. Because of that I am left without relatives and friends because Crisis Services Inc., proclaims around the world that I am mentally ill, and that no one should be in contact with me. My immediate family members, colleagues, relatives and friends have all forsaken me because false propaganda against me by Crisis Services Inc.,
- 8) Crisis Services Inc., members are also International Journalists like Jennifer Fierberger, Medical social worker who is also a Journalist for Salem-news.com. Jennifer has succeeded in recruiting my political enemies who have since murdered several members of my extended family in Africa for political reasons.

In this verified complaint, I am urging the County to investigate the atrocity Crisis Services, Inc., has committed both in their overseas operations and here at home. I want the County to clear my name of psychiatric labeling me mentally ill because I have no mental illness, and to apologize for their actions that caused me great losses, and to pay further compensatory damages as the Court may deem just and proper.

Sincerely,



Augustin Mugabo

Heidi A. Gerace  
Heidi A. Gerace

Commissioner of debts  
in and for the city of Buffalo, NY  
Term expires 12/31/12