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MICHAEL A. SIRAGUSA  
ERIE COUNTY ATTORNEY

## COUNTY OF ERIE

**MARK C. POLONCARZ**

COUNTY EXECUTIVE  
DEPARTMENT OF LAW

MICHELLE M. PARKER  
FIRST ASSISTANT COUNTY ATTORNEY

JEREMY C. TOTI  
SECOND ASSISTANT COUNTY ATTORNEY

### MEMORANDUM

TO: Robert Graber, Clerk, Erie County Legislature  
FROM: Michelle M. Parker, First Assistant County Attorney *Michelle*  
DATE: February 15, 2012  
RE: Transmittal of new Claims Against Erie County

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Mr. Graber:

In accordance with the Resolution passed by the Erie County Legislature on June 25, 1987 (Int. 13-14), attached please find seven (7) new claims brought against the County of Erie. The claims are as follows:

Claim Name

Jill Spicola, Ind. and as MNG of Dane Gilcrist and Dane Gilcrist, Ind. vs County of Erie  
Rosemary Dayton vs County of Erie, et al.  
Ernest Cathon, Ind and Ernest Carthon as Admin. Of Estate of Janie Hunt vs Erie County, et al.  
Ronald Gast vs County of Erie  
Keith Dienno vs County of Erie and ECIDA  
Tyshawn Redfern vs Erie County, et al.  
Candida Johnson as PNG of Ayana Johnson vs County of Erie

MMP/crj  
Attachments

cc: Michael A. Siragusa, Erie County Attorney

4D-3



## COUNTY OF ERIE

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SECOND ASSISTANT COUNTY ATTORNEY

February 15, 2012

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>Spicola, Jill, Ind. and as MNG of Gilcrist, Dane and Dane Gilcrist, Ind. vs County of Erie</i>
Document Received:	Notice of Claim
Name of Claimant:	Jill Spicola 3948 Nottingham Terrace Hamburg, New York 14075
Claimant's attorney:	Christopher M. Pannozzo, Esq. Shaw & Shaw, P.C. 4819 South Park Avenue Hamburg, New York 14075

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA  
Erie County Attorney

By: *Michelle Parker*  
MICHELLE M. PARKER  
First Assistant County Attorney

MMP/mow

Enc.

cc: Michael A. Siragusa, Erie County Attorney

STATE OF NEW YORK

JILL SPICOLA, Individually and as Mother and  
Natural Guardian of DANE GILCRIST, and  
DANE GILCRIST, Individually  
3948 Nottingham Terrace  
Hamburg, NY 14075

This paper received at  
Erie County Clerk's Office  
on the 9 day of Feb 2012  
at 10 a.m. p.m.  
by Cheryl Campbell  
Deputy Clerk

NOTICE OF CLAIM

Claimants

vs.

COUNTY OF ERIE  
Erie County Courthouse  
Buffalo, NY 14202

Respondent

TO THE RESPONDENT:

PLEASE TAKE NOTE that claimants hereby claim damages against  
respondent, and in accordance with the requirements of General Municipal  
Law Section 50-e states as follows:

Claimants state:

1) Names and Addresses of Claimants

JILL SPICOLA and DANE GILCRIST  
3948 Nottingham Terrace  
Hamburg, NY 14075

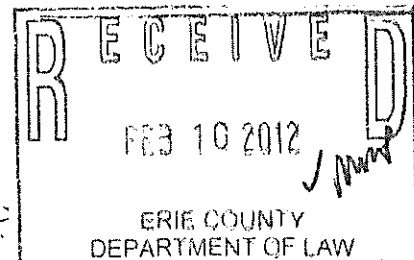
2) Name and Address of Claimants' Attorneys

Christopher M. Pannozzo, Esq.  
Shaw & Shaw, P.C.  
4819 South Park Avenue  
Hamburg, NY 14075  
(716) 648-3020 Telephone  
(716) 648-3730 Telecopier

3) Date, Time and Location Where Claim Arose

December 9, 2011 on the second floor of Building 3 at  
the Erie Community College, 4041 Southwestern Boulevard,  
Orchard Park, New York.

SHAW SHAW, PC  
ATTORNEYS AND COUNSELLORS AT LAW



4) **Nature and Basis of Claim**

The claim of Dane Gilcrist is for damages resulting from personal injuries he sustained as a result of an incident which occurred on December 9, 2011. At that time, the claimant was a registered student at Erie Community College. As he was walking along the hallway of Building 3 to get to class, he was confronted and assaulted by an individual who was not a student of the School, and caused to sustain very serious injuries.

The negligence, recklessness and wanton disregard for the safety of others of and by the respondent herein, their agents, servants and/or employees consists, *inter alia*, of:

- (1) respondent failed to properly, adequately, and safely maintain the aforesaid premises;
- (2) failed to properly and adequately supervise and control the area where claimant Dane Gilcrist was assaulted;
- (3) failed to have in place procedures that would protect students from non-students who were entering the college;
- (4) carelessly and negligently failed to properly supervise the area where claimant Dane Gilcrist was assaulted;
- (5) failed to take the necessary steps to keep the hallways and other school grounds free and clear of non-registered individuals, especially in areas away from registration and enrollment areas;
- (6) failed to take the necessary steps and make the necessary observations, which, if taken or made, would have avoided the said incident; and
- (7) in that respondent was otherwise negligent, careless and reckless.

5. **Injuries Sustained**

Upon information and belief, the claimant, Dane Gilcrist, has sustained, without limitation, serious physical injury, including numerous injuries, the majority of which were severe, painful and permanent in nature, including a facial fracture, fractures of the

teeth, bruising, and sprains and strains to the body, as well as shock to the nerves and nervous system, circulatory system, traumatic injury to bones, nerves, tendons, muscular and skeletal systems, with resultant impairment and/or loss of use of normal function; was otherwise rendered sick, sore, lame and disabled; was under the care of medical doctors and other healthcare professionals, and will be so under such care in the future, and was prevented from following his usual duties and activities for a period of time subsequent to this action; has incurred, or may suffer a sustained loss of earnings and/or loss of future earning potential and/or capacity; has incurred, or may incur, hospital expenses, medical expenses, physical therapy and/or rehabilitation expenses and/or other similar types of expenses as to the past, present or future, as will relate to the care, treatment and attempted cure of the injuries sustained and/or the residual effects thereof; has been deprived of the ability to enjoy the life and lifestyle that he was so able to participate in and enjoy prior to the happening of this accident; and has been caused to suffer emotional upset, anxiety and depression as a result of the pain and suffering associated with the injuries as to the past and present, and upon information and belief, into said future years; has or may suffer loss in excess of basic economic loss, together with any and all special and general damages as they manifest themselves subsequent to the date of this Notice of Claim.

The claim of claimant, Jill Spicola, is for the loss of services, society and companionship of her son, claimant Dane Gilcrist, as a result of the negligence, carelessness and/or reckless disregard for the safety of the claimant, Dane Gilcrist, herein, resulting in, among other things, the acts and/or omissions of the respondent, as well as its agents, servants and/or employees.

Claimant Jill Spicola also makes claim for any and all medical expenses incurred as to the care, treatment and attempted cure of the injuries sustained and/or the residual effects of the same by her son, the claimant, Dane Gilcrist, as to the past, present and/or future.


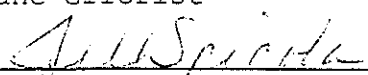
6. **Damages**

The claimants makes claim for the following damages:

- a) pain and suffering, and all physical injuries sustained by claimant, Dane Gilcrist;

- b) emotional upset and/or injury of the claimant, Dane Gilcrist;
- c) physical disfigurement of the claimant, Dane Gilcrist;
- d) loss of earnings of the claimant, Dane Gilcrist;
- e) impairment of earning capacity and/or future earnings of the claimant, Dane Gilcrist;
- f) loss of ability to enjoy the life and lifestyle which claimant, Dane Gilcrist was able to participate in and enjoy prior to the happening of the accident;
- g) all expenses associated with medical, hospital, nursing, physical therapy and any and all other rehabilitative and/or therapy care and treatment rendered as to the cure and/or attempted cure of the injuries sustained by the claimant, including the residual effects thereof as to the past, present and/or future;
- h) loss of services, society and companionship;
- i) any and all other special and general damages as they may manifest themselves subsequent to the date of this Notice; and
- j) as to all of the above, the same will relate to the past to present and present to future damages.

Dated: January 17, 2012  
Hamburg, New York

  
\_\_\_\_\_  
Dane Gilcrist  
  
\_\_\_\_\_  
Jill Spicola

SHAW & SHAW, P.C.  
Christopher M. Pannoizzo, Esq., of counsel  
Attorneys for Claimants  
4819 South Park Avenue  
Hamburg, New York 14075  
(716) 648-3020 Telephone  
(716) 648-3730 Telecopier

VERIFICATION

STATE OF NEW YORK       )  
                                  ) ss.:  
COUNTY OF ERIE        )

**DANE GILCRIST**, being duly sworn, deposes and says that he is the claimant in the within action; that he has read the foregoing and knows the contents thereof; that the same is true to his own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters, deponent believes it to be true.

Dane Gilcrist  
Dane Gilcrist

Sworn to before me this  
31 day of January 2012.

Gail Garfo  
Notary Public

GAIL GARFO  
Notary Public, State of New York  
Qualified on 1/1/11  
My Commission Expires 1/1/15

STATE OF NEW YORK       )  
                                  ) ss.:  
COUNTY OF ERIE        )

**JILL SPICOLA**, being duly sworn, deposes and says that she is the claimant in the within action; that she has read the foregoing and knows the contents thereof; that the same is true to her own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters, deponent believes it to be true.

Jill Spicola  
Jill Spicola

Sworn to before me this  
31 day of January 2012.

Gail Garfo  
Notary Public

GAIL GARFO  
Notary Public, State of New York  
Qualified on 1/1/11  
My Commission Expires 1/1/15



## COUNTY OF ERIE

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ERIE COUNTY ATTORNEY

**MARK C. POLONCARZ**

COUNTY EXECUTIVE  
DEPARTMENT OF LAW

MICHELLE M. PARKER  
FIRST ASSISTANT COUNTY ATTORNEY

JEREMY C. TOTH  
SECOND ASSISTANT COUNTY ATTORNEY

February 15, 2012

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>Dayton, Rosemary vs County of Erie, Erie County Medical Center and Dr. Sarah Gauli</i>
Document Received:	Notice of Claim
Name of Claimant:	Rosemary Dayton 10 Cloister Court Amherst, New York 14226
Claimant's attorney:	Joseph J. Marusak, Esq. Kloss, Stenger & LoTempio 69 Delaware Avenue, Suite 1003 Buffalo, New York 14202

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA  
Erie County Attorney

By: *Michelle Parker*  
MICHELLE M. PARKER  
First Assistant County Attorney

MMP/mow

Enc.

cc: Michael A. Siragusa, Erie County Attorney



In the Matter of the Claim of

ROSEMARY DAYTON,

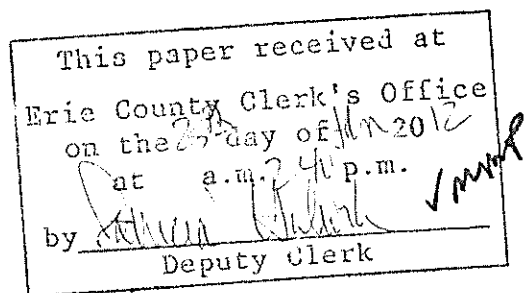
Claimant,

-against -

THE COUNTY OF ERIE,  
ERIE COUNTY MEDICAL CENTER, and  
Dr. SARAH GAULI,

Respondents.

**NOTICE OF  
CLAIM**



TO: THE COUNTY OF ERIE,  
ERIE COUNTY MEDICAL CENTER,

PLEASE TAKE NOTICE THAT Rosemary Dayton has, and hereby makes, claim against the County of Erie, Erie County Medical Center, and Dr. Sarah Gauli; and in support of said claim states as follows:

1. The Post Office address of Claimant is 10 Cloister Court, Amherst, New York 14226.
2. The attorney for Claimant is Joseph J. Marusak, of Counsel to Kloss, Stenger & LoTempio. His Post Office address is 69 Delaware Ave., Suite 1003, Buffalo, New York 14202.
3. Rosemary Dayton's claim is for personal injuries, including but not limited to, medical expenses and for consequential damages generally.
4. The claim arose at the Erie county Medical Center, 462 Grider Street, City of Buffalo, County of Erie and State of New York.
5. Upon information and belief, the claim arose in substance as follows: On the 26<sup>th</sup> day of October 2011 claimant Rosemary Dayton was injured during the course of being

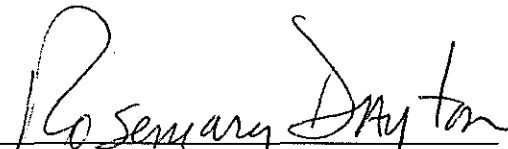
anesthetized by Dr. Sarah Gauli in preparation for surgery to her left shoulder at Erie County Medical Center, resulting in serious injury to the Claimant.

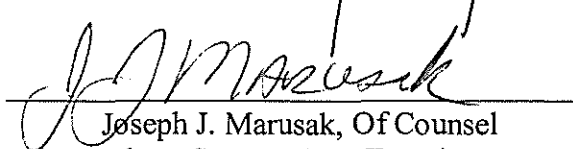
6. Upon information and belief, the incident herein described, and the resultant injuries and damages sustained, were caused by the medical malpractice, negligence, carelessness, and/or recklessness on the parts of the agents, servants and/or employees of the County of Erie, Erie County Medical Center and Dr. Sarah Gauli, and more particularly, among other things, in: failing and omitting to ensure that appropriate care and discretion was used; failing and omitting to properly have adequate instruction, supervision and training; and negligently injuring the Claimant by failing to properly and safely anesthetize her.

7. Upon information and belief, as a result of the aforesaid incident Claimant Rosemary Dayton sustained severe injuries, was painfully and seriously injured, was rendered sore, lame and disabled; sustained pain, suffering and shock to her nerves and nervous system; and more particularly, Rosemary Dayton sustained injuries in the nature of neurologic deficits to her left shoulder and left upper extremity. These injuries will result in permanent defects.

**WHEREFORE**, Claimant requests that the County of Erie, Erie County Medical Center and Dr. Sarah Gauli honor and pay the claim on behalf of Rosemary Dayton.

DATED: Buffalo, New York  
January 24, 2012

  
\_\_\_\_\_  
Rosemary Dayton

  
\_\_\_\_\_  
Joseph J. Marusak, Of Counsel  
Kloss, Stenger & LoTempio  
69 Delaware Avenue, Suite 1003  
Buffalo, New York 14202  
(716) 853-1111



## COUNTY OF ERIE

MICHAEL A. SIRAGUSA  
ERIE COUNTY ATTORNEY

**MARK C. POLONCARZ**

COUNTY EXECUTIVE  
DEPARTMENT OF LAW

MICHELLE M. PARKER  
FIRST ASSISTANT COUNTY ATTORNEY

JEREMY C. TOTH  
SECOND ASSISTANT COUNTY ATTORNEY

February 15, 2012

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>Carthon, Ernest, Ind. &amp; Ernest Carthon as Admin. of the Estate of Hunt, Janie M. vs Erie County, Erie County Medical Center, its agents, servants, independent contractors and employees</i>
Document Received:	Notice of Claim
Name of Claimant:	Ernest Carthon 49 Camelot Court Buffalo, New York 14214
Claimant's attorney:	Emily P. Trott, Esq. 112 Franklin Street, Suite 200 Buffalo, New York 14202

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA  
Erie County Attorney

By:   
MICHELLE M. PARKER  
First Assistant County Attorney

MMP/mow  
Enc.

cc: Michael A. Siragusa, Erie County Attorney

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ERIE

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ERNEST CARTHON, individually, and Ernest  
CARTHON as Administrator of the Estate of  
JANIE M. HUNT,

Claimants

vs

ERIE COUNTY, ERIE COUNTY MEDICAL  
CENTER, its Agents, Servants, Independent  
Contractors and Employees,

Respondents

---

SIRS:

**PLEASE TAKE NOTICE**, that the claimant herein makes claim and demand against  
the ERIE COUNTY MEDICAL CENTER, its agents, servants, staff and assigns, as follows:

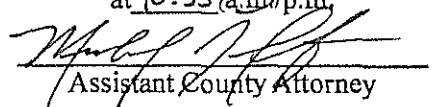
1. The name and address of the Claimant is:

ERNEST CARTHON as Administrator  
of the Estate of JANIE M. HUNT  
Ernest Carthon, Individually  
49 Camelot Court  
Buffalo, New York 14214

The name and address of the Claimant's attorney is:

EMILY P. TROTT, ESQ.  
112 Franklin Street, Suite 200  
Buffalo, New York 14202

2. The nature of the claim is for damages resulting from negligence and medical  
malpractice sustained by the deceased, JANIE M. HUNT, while under the care and treatment  
provided at the ERIE COUNTY MEDICAL CENTER. The aforementioned conduct resulted

This paper received at the  
Erie County Attorney's Office  
from Linda Kotaras on  
the 27 day of January, 2012  
at 10:55 a.m./p.m.  
  
Assistant County Attorney

in her pain and suffering and her wrongful death, due to the negligent care, negligent monitoring, medical malpractice and supervision of the deceased while a patient at the ERIE COUNTY MEDICAL CENTER, 462 Grider Street, Buffalo, New York, and while under the care and treatment of the employees, independent contractors medical staff and personnel therein and thereat. The ERIE COUNTY MEDICAL CENTER is a municipal entity of the COUNTY OF ERIE.

3. The time when, place where, and the manner in which claim arose: Said claim arose:

On or about August 14, 2011, the deceased-claimant, JANIE HUNT experienced suffered an emergent episode while in the care of the COUNTY OF ERIE at the ERIE COUNTY MEDICAL CENTER and while on the premises of the ERIE COUNTY MEDICAL CENTER in the County of Erie and City of Buffalo. The decedent-claimant's emergency code was not diligently or timely answered while at ECMC, and the deceased-claimant suffered severe brain damage leaving her in a partially vegetative state.

During the medical episode, the deceased suffered great pain and angst as she gasped for air during the minutes that elapsed prior to any medical response. The claimant's emergency alarm was not promptly responded to due to lack of sufficient medical staff during the episode at the ERIE COUNTY MEDICAL CENTER (hereinafter referred to as ECMC.). The decedent-claimant's emergency alarm was not responded to in a sufficiently swift manner so as to avoid the lingering injury to her brain and body. THE COUNTY OF ERIE is responsible for the mismanagement and negligence on the part of the ERIE COUNTY MEDICAL CENTER.

After the initial episode heretofore mentioned, the complainant languished and suffered while in this state for approximately five (5) weeks until her untimely death on October 28, 2011. During this period, JANIE HUNT, suffered extreme anguish and pain during the medical episode and because of the episode.

The claimant, ERNEST CARTHON suffered mental anguish when he was notified by ECMC that his mother was in a non-responsive state. Mr. Carthon suffered pecuniary loss as a

result of his mother's untimely death. This loss was occasioned by the negligence and mismanagement of the ERIE COUNTY MEDICAL CENTER and the COUNTY OF ERIE.

4. The items of personal injury claimed are:

A. As to Janie M. Hunt, by Ernest Carthon as Administrator of the Estate:

1. Pain and suffering as a result of negligence, improper care for patients, failure to maintain the coding system in the hospital; failure to properly staff the hospital and for other negligent and culpable acts.

2. Hypoxia and brain damage as a result of the emergency medical episode requiring operative intervention and permanent intubation until the claimant's untimely death, as well as a feeding tube to be inserted to sustain her life.

3. Brain damage, heart damage and lung damage and injury as a result of the lack of care, the negligent monitoring and malfeasance of the respondent, ECMC.

4. The exact amount of loss has yet to be determined;

5. The exact amount of medical expenses for physicians and/or hospital care as yet to be determined.

B. As to the claimant, Ernest Carthon, individually:

1. Mental anguish as a result of the negligence of the respondents;

2. Pain and suffering as a result of the malfeasance and negligence of the respondents.

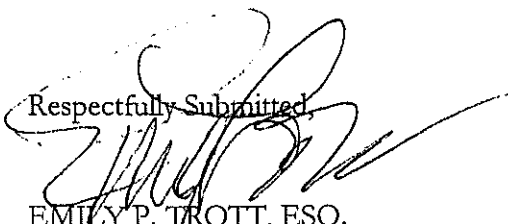
3. Pecuniary and economic loss as a result of his mother's death.

4. The exact amount of the claimant's pain and suffering as a result of the respondents' malfeasance, negligence and inattentiveness has yet to be determined.

***PLEASE TAKE FURTHER NOTICE***, that in the event of default of the aforesaid ERIE COUNTY MEDICAL CENTER and the COUNTY OF ERIE, the Claimant intends to commence an action against the ERIE COUNTY MEDICAL CENTER and the COUNTY OF ERIE to recover for their damages.

DATED: Buffalo, New York  
January 25, 2012

Respectfully Submitted,



EMILY P. TROTT, ESQ.

Attorney for Claimants

*Office and PO Box Address:*

112 Franklin Street, Suite 200

Buffalo, New York 14202

*Tel. Number:* 716-849-0554

**CLIENT VERIFICATION**

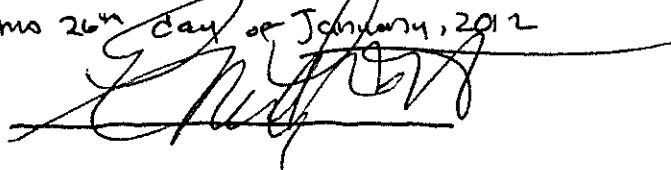
I, **ERNEST CARTHON**, HEREBY STATE, under penalty of perjury, that I have carefully read and reviewed the annexed Notice of Claim, and that all information contained in that document is true and accurate in all respects to the best of my knowledge and understanding.

I FURTHER CERTIFY, under penalty of perjury, that neither my attorney nor anyone acting on my attorney's behalf, was the source of any information contained in the annexed document; that I provided all of the information contained in the annexed document to my attorney.

I FURTHER CERTIFY that the annexed document includes all information which I provided to my attorney which is relevant to such document and that my attorney has not deleted, omitted or excluded any such information.

**DATED:** January 26, 2012  
Buffalo, New York 14202

  
**ERNEST CARTHON**

Sworn to before me  
this 26<sup>th</sup> day of January, 2012  


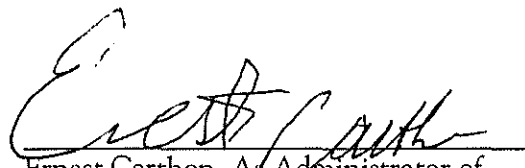
Emily P. Trott  
Notary Public, State of New York  
Qualified in Erie County  
My Commission Expires March 10, 2015

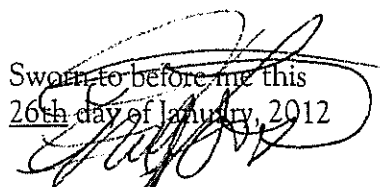


VERIFICATION

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

Ernest Carthon, As administrator of the estate of Janie M. Hunt, being duly sworn, deposes and says, that he is the Claimant in this action; that he 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 those matters therein stated to be alleged upon information and belief, and that as to those matters he believes to be true.

  
Ernest Carthon, As Administrator of  
the Estate of Janie M. Hunt

Sworn to before me this  
26th day of January, 2012  
  
\_\_\_\_\_  
Notary Public

Emily P. Trott  
Notary Public, State of New York  
Commission Expires March 10, 2015



## COUNTY OF ERIE

MICHAEL A. SIRAGUSA  
ERIE COUNTY ATTORNEY

**MARK C. POLONCARZ**

COUNTY EXECUTIVE  
DEPARTMENT OF LAW

MICHELLE M. PARKER  
FIRST ASSISTANT COUNTY ATTORNEY

JEREMY C. TOTH  
SECOND ASSISTANT COUNTY ATTORNEY

February 15, 2012

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>Gast, Ronald vs County of Erie</i>
Document Received:	Notice of Claim
Name of Claimant:	Ronald Gast ICN # 5742 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,

MICHAEL A. SIRAGUSA  
Erie County Attorney

By: *Michelle Parker*  
MICHELLE M. PARKER  
First Assistant County Attorney

MMP/mow

Enc.

cc: Michael A. Siragusa, Erie County Attorney

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ERIE

=====X

RONALD GAST

Claimant,

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 RONALD GAST, ICN#5742, 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:

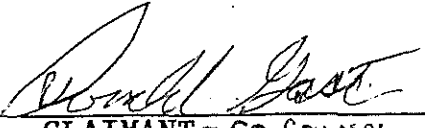
1. The name and post office address of the claimant is:

RONALD GAST, 40 DELAWARE AVE., BUFFALO, NEW YORK ~~14202~~, 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: 1.) ON January 22, 2012(ON OR ABOUT) I was held with deliberate disregard for my safety and well being as I informed all applicable Erie County Holding Center personnel that I was suicidal due to the fact that I was not receiving any of my prescribed medications. 2.) I brought all of my medications as proof. 3.) While housed at the Holding Center on a unit called ALPHA LONG, A.M. HOURS-CELL#1, the unit deputy did infactslide to me a sharp plastic fold and told me to "SLICE MY WRIST YOU MANIPULATING FUCK," AND SHE, the deputy watched as I did attempt to kill myself,. 4.) The County Forensic counselor also made a simular remark as I told her personally ~~AND~~ informed her that I was not feeling well due to not receiving my meds and I need to be seen because of mental unstability and suicidal thoughts. 5.)DUE TO THE AFOREMENTIONEED INOW SUFFER EMOTIONALENHANSMENT,~DURESS, AND HAVE PERMINATE SCARS DUE TO THE DELIBERATE INDIFFERENCE OF ALL APPLICABLE FORENSIC AND ERIE COUNTY HOLDING CENTER PERSONNEL. I ALSO CONTINUE TO SUFFER DUE TO THE FACT THAT I AM NOT RECEIVING APPROPRIATE TREATMENT OR ANY OF MY PRESCRIBED MEDICATIONS AS I AM UNDER TREATMENT. I RESERVE THE RIGHT TO AMEND THIS CLAIM/NOTICE OF CLAIM.

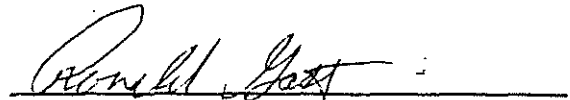
4. Take further notice that claimant demands payment of his claim, and unless the claim is paid within a reasonable amount of time, and unless the claim is paid within a reasonable amount of time, it is the intention of the claimant to commence a lawsuit against the COUNTY OF ERIE to recover sums claimed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

  
CLAIMANT - Co-Counsel  
RONALD GAST

VERIFICATION

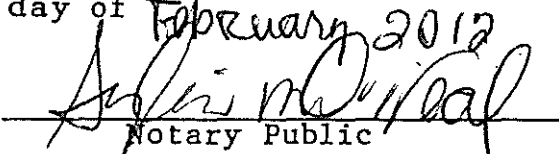
STATE OF NEW YORK )  
COUNTY OF ERIE ) ss.;  
CITY OF BUFFALO )

RONALD GAST, 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.



RONALD GAST, ICN#5742

Pro Se/Co-Counsel

Sworn to before me this 2nd  
day of February 2012  
  
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

MICHAEL A. SIRAGUSA  
ERIE COUNTY ATTORNEY

**MARK C. POLONCARZ**

COUNTY EXECUTIVE  
DEPARTMENT OF LAW

MICHELLE M. PARKER  
FIRST ASSISTANT COUNTY ATTORNEY

JEREMY C. TOTH  
SECOND ASSISTANT COUNTY ATTORNEY

February 15, 2012

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>Dienno, Keith vs County of Erie and Erie County Industrial Development Agency</i>
Document Received:	Notice of Claim
Name of Claimant:	Keith Dienno 81 St. Joan Lane Cheektowaga, New York 14227
Claimant's attorney:	Samuel J. Capizzi, Esq. Brown Chiari LLP 5775 Broadway Lancaster, New York 14086

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA  
Erie County Attorney

By:   
MICHELLE M. PARKER  
First Assistant County Attorney

MMP/mow

Enc.

cc: Michael A. Siragusa, Erie County Attorney

STATE OF NEW YORK :  
SUPREME COURT : COUNTY OF ERIE

---

KEITH DIENNO

Claimant

vs.

## NOTICE OF CLAIM

COUNTY OF ERIE and  
ERIE COUNTY INDUSTRIAL DEVELOPMENT AGENCY

Respondents

---

TO: Jeremy A. Colby, Esq.  
Erie County Attorney  
95 Franklin Street, Suite 1634  
Buffalo, New York 14202

Supervisor/Director  
Erie County Industrial Development Agency  
143 Genesee Street  
Buffalo, New York 14203

To whom it may concern:

PLEASE TAKE NOTICE, that the undersigned hereby makes claim against and submits the following in compliance with the applicable statutes of the State of New York.

1. The Claimant herein is KEITH DIENNO, who resides at 81 St. Joan Lane, Cheektowaga, NY 14227.
2. The Claimant herein is represented by the law firm of BROWN CHIARI LLP, 5775 Broadway, Lancaster, New York 14086-2360. The subject claim is for personal injuries and medical expenses sustained by reason of injury to Claimant KEITH DIENNO.

3. That the subject claim is for personal injuries, medical expenses and derivative damages sustained by reason of personal injury to KEITH DIENNO.

4. The incident giving rise to these damages occurred on or about December 8, 2011 at a building located at 2001 Elmwood Avenue, Buffalo, New York. More specifically, within such parcel, the incident occurred at the portion of the building now occupied by Best Fitness and, upon information and belief, owned by the County of Erie and/or the Erie County Industrial Development Agency.

5. The said damages for which claim is hereby made arose in the following manner, to wit:

Keith Dienno, while working in the course of his employment for 5 West Enterprises, was working from a ladder in an attempt to install cable, phone and internet service to the building when the ladder upon which he was working slipped out and/or kicked out causing him to fall approximately 15-feet to the ground below. The aforesaid injuries were caused by the negligence of the County of Erie and/or Erie County Industrial Development Agency, their agents, servants and/or employees, in failing to provide a safe place to work pursuant to their common law and statutory duties as set forth in New York State Labor Law §§ 200, 240(1), and 241(6) in that, upon information and belief, one or both of the respondents above named were the record owners of all or a portion of the buildings at issue.

6. Claimant KEITH DIENNO sustained, among other injuries, closed head injury, concussion, various contusions and abrasions on the left side of his head and body and a fracture of his left wrist.

7. The subject claim is for a sum to be determined by a jury.




DATED: January <sup>31</sup>~~30~~, 2012

  
Keith Dienno

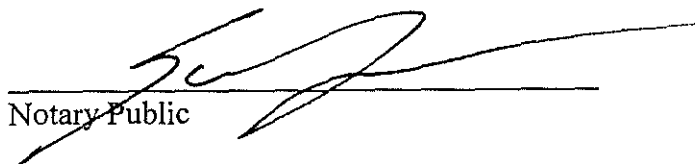
STATE OF NEW YORK)  
COUNTY OF ERIE)

ss:

On the 31<sup>st</sup> day of January, 2012, Keith Dienno, being duly sworn, deposes and says that he is the claimant in this matter; that he has read the foregoing Notice of Claim and knows the contents thereof; that it is true to his personal knowledge, except as to matters stated to be upon information and belief, and as those matters he believes to be true.

  
Keith Dienno

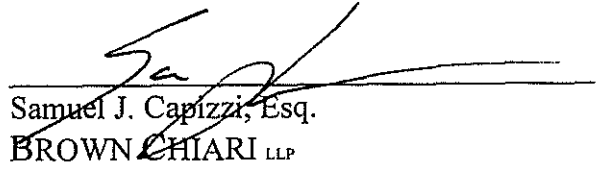
Sworn to before me on this  
31<sup>st</sup> day of January, 2012.

  
Notary Public

SAMUEL J. CAPIZZI  
NOTARY PUBLIC, STATE OF NEW YORK  
QUALIFIED IN ERIE COUNTY  
My Commission Expires 2/16/2015

**CERTIFICATION**

Pursuant to Part 130-1 of the Rules of the Chief Administrator, the undersigned attorney certifies that, to the best of my knowledge, information and belief, formed after inquiry reasonable under the circumstances, the presentation of this paper or the contentions therein are not frivolous as defined in subsection (c) of §130-1.1.



Samuel J. Capizzi, Esq.

BROWN CHIARI LLP

**Attorneys for Claimant**

5775 Broadway

Lancaster, New York 14086-2360

(716) 681-7190



## COUNTY OF ERIE

MICHAEL A. SIRAGUSA  
ERIE COUNTY ATTORNEY

**MARK C. POLONCARZ**

COUNTY EXECUTIVE  
DEPARTMENT OF LAW

MICHELLE M. PARKER  
FIRST ASSISTANT COUNTY ATTORNEY

JEREMY C. TOTH  
SECOND ASSISTANT COUNTY ATTORNEY

February 15, 2012

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>Redfern, Tyshawn vs Buffalo and Erie County Public Library, City of Buffalo and Erie County</i>
Document Received:	Notice of Claim
Name of Claimant:	Tyshawn Redfern 58 Poultney Avenue Buffalo, New York 14215
Claimant's attorney:	Andrew J. Connelly, Esq. Andrews, Bernstein & Maranto, LLP 69 Delaware Avenue, Suite 1200 Buffalo, New York 14202

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA  
Erie County Attorney

By: *Michelle Parker*  
MICHELLE M. PARKER  
First Assistant County Attorney

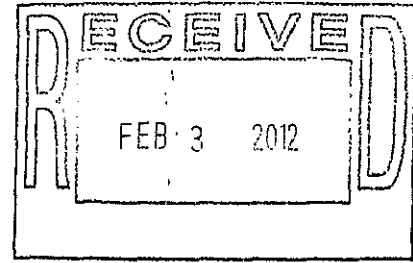
MMP/mow

Enc.

cc: Michael A. Siragusa, Erie County Attorney

STATE OF NEW YORK  
SUPREME COURT : COUNTY OF ERIE

---



TYSHAWN REDFERN  
58 Poultney Avenue  
Buffalo, New York 14215

Claimant,

**NOTICE OF CLAIM**

vs.

BUFFALO AND ERIE COUNTY PUBLIC LIBRARY  
1 Lafayette Square  
Buffalo, New York 14203

CITY OF BUFFALO  
1100 City Hall  
Buffalo, New York 14202

ERIE COUNTY  
95 Franklin Street  
16<sup>th</sup> Floor  
Buffalo, New York 14202

Respondents.

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PLEASE TAKE NOTICE, that TYSHAWN REDFERN has and hereby makes a claim against the BUFFALO AND ERIE COUNTY PUBLIC LIBRARY, CITY OF BUFFALO, and ERIE COUNTY, and in support of said claim states the following:

1. The Post Office address of the Claimant is 58 Poultney Avenue, Buffalo, New York 14215.
2. The attorney for the Claimant is Andrews, Bernstein & Maranto, LLP., Andrew J. Connelly, Esq., of counsel, 420 Franklin Street, Buffalo, New York 14202, Telephone (716) 842-2200.
3. The claim arose as follows: On or about the 5<sup>th</sup> day of December, 2011, at approximately 5:45 p.m., while in the parking lot of the East Delevan branch of the BUFFALO AND ERIE COUNTY PUBLIC LIBRARY, located on or about 1187 East

Delevan Avenue, Buffalo, New York, the Claimant, age 34, was caused to fall into an uncovered man hole.

4. Upon information and belief, the area in which Claimant fell was and is owned, controlled, maintained, and regularly inspected by the BUFFALO AND ERIE COUNTY PUBLIC LIBRARY and/or CITY OF BUFFALO and/or ERIE COUNTY, their agents, servants and/or employees.

5. This incident was caused by the negligence, carelessness, and recklessness of the BUFFALO AND ERIE COUNTY PUBLIC LIBRARY, CITY OF BUFFALO and/or ERIE COUNTY, their agents, servants, and/or employees as follows:

- a. Negligently creating or maintaining a dangerous condition in the subject area, to wit: an uncovered manhole;
- b. Negligently failing to maintain the subject area in a reasonably safe condition;
- c. Negligently failing to warn the Claimant of the dangerous and hazardous condition in the subject area;
- d. Negligently failing to recognize a known hazardous condition;
- e. Negligently failing to take proper measures to correct the dangerous condition in the subject area;
- f. The Respondents were otherwise negligent;

6. The claim of TYSHAWN REDFERN is for pain and suffering, emotional pain and suffering, consequential damages, as well as medical expenses.

7. By the virtue of the negligence, carelessness, and recklessness of the BUFFALO AND ERIE COUNTY PUBLIC LIBRARY, CITY OF BUFFALO and ERIE COUNTY, Claimant was caused to suffer serious, significant, and permanent injuries as a result of this incident, including injuries as yet unknown to her right leg/knee, lower back

and head. Claimant also suffered other injuries and complications as yet undetermined, and as such, sustained damages in an amount which cannot be reasonably calculated at this time.

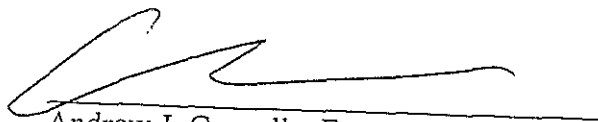
**WHEREFORE**, Claimant requests that the BUFFALO AND ERIE COUNTY PUBLIC LIBRARY, CITY OF BUFFALO and ERIE COUNTY compensate her for her injuries and damages.

Dated: Buffalo, New York  
January 16, 2012

Yours, etc.,

**ANDREWS, BERNSTEIN & MARANTO, LLP**

By:




Andrew J. Connelly, Esq.  
*Attorneys for Claimant*  
420 Franklin Street  
Buffalo, New York 14202  
(716) 842-2200

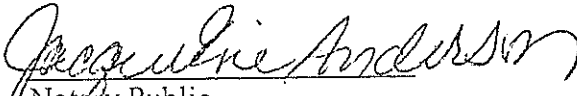
VERIFICATION

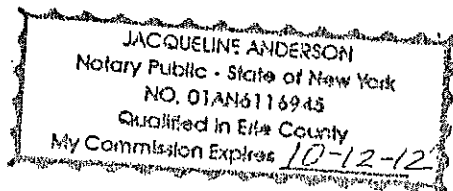
STATE OF NEW YORK :  
COUNTY OF ERIE : ss.  
CITY OF BUFFALO :

Tyshawn Redfern, being duly sworn, deposes and says that she is the Claimant in this action, that she has read the foregoing Notice of Claim in this action 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, she believes them to be true.

  
Tyshawna Redfern

Sworn to before me this 24  
day of January, 2012

  
Notary Public





## COUNTY OF ERIE

MICHAEL A. SIRAGUSA  
ERIE COUNTY ATTORNEY

**MARK C. POLONCARZ**

COUNTY EXECUTIVE  
DEPARTMENT OF LAW

MICHELLE M. PARKER  
FIRST ASSISTANT COUNTY ATTORNEY

JEREMY C. TOTH  
SECOND ASSISTANT COUNTY ATTORNEY

February 15, 2012

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>Johnson, Candida as PNG of Ayana Johnson, infant vs County of Erie, New York</i>
Document Received:	Notice of Claim
Name of Claimant:	Candida Johnson 227 East Amherst Street Buffalo, New York 14214
Claimant's attorney:	Michael Luh, Esq. 300 International Drive Buffalo, New York 14221

Should you have any questions, please call.

Very truly yours,

MICHAEL A. SIRAGUSA  
Erie County Attorney

By: *Michelle Parker*  
MICHELLE M. PARKER  
First Assistant County Attorney

MMP/mow

Enc.

cc: Michael A. Siragusa, Erie County Attorney



STATE OF NEW YORK  
SUPREME COURT: COUNTY OF ERIE

\*\*\*\*\*

Candida Johnson as Parent and Natural Guardian  
of Ayana Johnson, infant

Vs.

NOTICE OF CLAIM

County of Erie, New York

\*\*\*\*\*

Candida Johnson as parent and natural guardian of Ayana Johnson, an infant, does hereby give notice to the County of Erie, New York of her claim against the County for personal injuries sustained by her daughter pursuant §50-e of the New York State General Municipal Law resulting from the negligence of the County of Erie.

1. Candida Johnson and her daughter Ayana Johnson reside at 227 East Amherst Street, Buffalo, New York 14214. Candida Johnson, in her capacity guardian of Ayana Johnson, is represented by attorney Michael Luh, Esq., 300 International Drive, Buffalo, New York 14221.

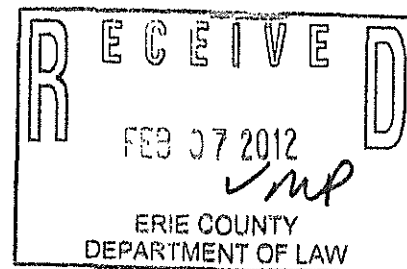
2. Please find attached as Exhibit 1, a report of accident prepared by the City of Buffalo Police Department.

3. On November 7, 2011 at approximately 7:30 a.m., Ayana Johnson, a pedestrian, was struck by a motor vehicle at the intersection of Main Street and East Amherst Street in the County of Buffalo, New York.

4. Prior to being struck by said vehicle, Ayana Johnson walked with her mother and younger brother in a westerly direction across Main Street using the crosswalk depicted in Exhibit 2. They entered the crosswalk with the traffic signal in their favor en route to a daycare center at 2680 Main Street, Buffalo, New York.

5. The traffic signal for southbound traffic on Main Street turned green before Ayana Johnson and her family members reached the northwest corner of the Main / East Amherst intersection.

6. Ayana Johnson was struck by a vehicle as it travelled south on Main Street approaching the Main Street/ East Amherst Street intersection.



7. The County's negligence was the proximate cause of the aforementioned accident and resulting injury to Ayana Johnson.

8. The County failed to provide a crossing guard to assist children in safely crossing Main Street westbound at the crosswalk depicted in Exhibit 2 en route to the daycare center at 2680 Main Street, Buffalo, New York.

9. The County failed to ensure that the pushbutton pedestrian detector shown in Exhibit 3 was properly marked. The pushbutton detector is located at the eastern side of the crosswalk depicted in exhibit 2. The pushbutton detector depicted in Exhibit 3 activates the pedestrian signal head (Exhibit 4) located at the opposite/ western side of the crosswalk depicted in Exhibit 2. The pedestrian signal head has a countdown display which displays the number of seconds westbound pedestrians will have the traffic signal in their favor. Because the pushbutton detector in Exhibit 3 was not marked, Candida Johnson did not notice it or use it. Thus Candida Johnson and Ayana Johnson entered the crosswalk without notice of how long the traffic signal would remain in their favor.

10. The County failed to use passive pedestrian detectors to ensure the regular operation the pedestrian signal head at the northwest corner of Main and East Amherst Street.

11. The County failed to install a pedestrian island near the crosswalk Depicted in Exhibit 2; an island would have provided Ayana Johnson with a safe place to stand when the traffic signal turned in favor of southbound traffic.

12. The County failed to post traffic signs requiring southbound motorists to yield to or stop for pedestrians within the crosswalk depicted in Exhibit 2.

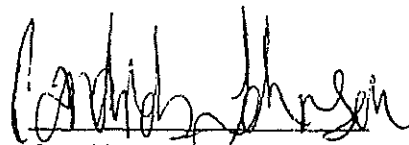
13. The County failed to establish a reduced school speed limit zone near 2680 Main Street, Buffalo, New York, the location of the Kidz Zone day care center, and or failed to seek New York State authorization for the establishment of same. The reduced school speed limit zone should have commenced at least two hundred feet north of the crosswalk depicted in Exhibit 2 pursuant to New York State Supplement to the Manual on Uniform Traffic Control Devices.

14. Prior to the date of this accident, the County failed to conduct an adequate pedestrian safety study with respect to crosswalk depicted in Exhibit 2.

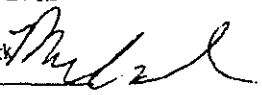
15. Prior to the date of this accident, the County failed to conduct an adequate pedestrian safety study with respect to Main Street/ East Amherst Street Intersection.

16. The County had actual notice of the aforescribed dangerous conditions by virtue of prior complaints from business residents; the County also had constructive notice of the aforementioned dangerous conditions.

17. Ayana Johnson sustained extensive injuries to both of her legs and was hospitalized in the intensive care unit of Children's Hospital of Buffalo, New York for approximately ten days. Ayana Johnson has not returned to school since date of accident and has not regained the full use of her legs. The extent of permanency of her injuries is presently unknown.

  
Candita Johnson

Subscribed to and sworn before me  
this 4 day of February, 2012

  
MICHAEL J. LUH  
Notary Public - State of New York  
No. 02116067830  
Qualified in Erie County  
My Commission Expires 12-17-20

1-3-12

Page 1 of 2 Pages  
Local Codes  
11-026582

New York State Department of Motor Vehicles  
**POLICE ACCIDENT REPORT**  
MV-104A (6/04)  
☒ AMENDED REPORT DMV COPY

1	Accident Date Month <u>11</u> Day <u>07</u> Year <u>2011</u>	Day of Week <u>Monday</u>	Military Time <u>0731</u>	No. of Vehicles <u>1</u>	No. Injured <u>1</u>	No. Killed <u>0</u>	Not Investigated at Scene <input type="checkbox"/>	Left Scene <input type="checkbox"/>	Police Photos <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No															
2	VEHICLE 1 Vehicle 1 - Driver License ID Number <u>509 622 442</u> State of Lic. <u>NY</u>				VEHICLE 2 - Driver License ID Number _____ State of Lic. _____																			
1	Driver Name - exactly as printed on license <u>Sanabria, John A</u>				Driver Name - exactly as printed on license <u>Johnson, Ayanna C</u>																			
1	Address (Include Number & Street) <u>561 7th St</u> Apt. No. _____				Address (Include Number & Street) <u>227 E Amherst St</u> Apt. No. <u>LS</u>																			
1	City or Town <u>Buffalo</u> State <u>NY</u> Zip Code <u>14201</u>				City or Town <u>Buffalo</u> State <u>NY</u> Zip Code <u>14214</u>																			
3	Date of Birth Month <u>02</u> Day <u>23</u> Year <u>1975</u>	Sex <u>M</u>	Uninsured <input type="checkbox"/>	No. of Occupants <u>2</u>	Public Property Damaged <input type="checkbox"/>	Date of Birth Month <u>06</u> Day <u>16</u> Year <u>2003</u>	Sex <u>F</u>	Uninsured <input type="checkbox"/>	No. of Occupants <u>1</u>	Public Property Damaged <input type="checkbox"/>														
2	Name - exactly as printed on registration <u>NFT-Metro</u>				Name - exactly as printed on registration <u>Johnson, Ayanna C</u>																			
4	Address (Include Number & Street) <u>164 Ohio St</u> Apt. No. _____				Address (Include Number & Street) _____ Apt. No. _____																			
1	City or Town <u>Buffalo</u> State <u>NY</u> Zip Code <u>14203</u>				City or Town _____ State _____ Zip Code _____																			
5	Plate Number <u>L89398</u>	State of Reg. <u>NY</u>	Vehicle Year & Make <u>2005 Ford</u>	Vehicle Type <u>Pick u</u>	Ins. Code <u>994</u>	Plate Number _____	State of Reg. _____	Vehicle Year & Make _____	Vehicle Type _____	Ins. Code _____														
1	Ticket/Arrest Number(s) _____				Ticket/Arrest Number(s) _____																			
1	Violation Section(s) _____				Violation Section(s) _____																			
0	Check if involved vehicle is: <input type="checkbox"/> more than 85 inches wide; <input type="checkbox"/> more than 34 feet long; <input type="checkbox"/> operated with an overweight permit; <input type="checkbox"/> operated with an overdimension permit.				Check if involved vehicle is: <input type="checkbox"/> more than 85 inches wide; <input type="checkbox"/> more than 34 feet long; <input type="checkbox"/> operated with an overweight permit; <input type="checkbox"/> operated with an overdimension permit.				Circle the diagram below that describes the accident, or draw your own diagram in space #3. Number the vehicles.															
1	VEHICLE 1 DAMAGE CODES Box 1 - Point of Impact Box 2 - Most Damage Enter up to three more Damage Codes				VEHICLE 2 DAMAGE CODES Box 1 - Point of Impact Box 2 - Most Damage Enter up to three more Damage Codes				ACIDENT DIAGRAM															
7	Vehicle By <u>NY/A</u> Towed: <u>To H/A</u>				Vehicle By <u>NY</u> Towed: <u>To</u>																			
1	VEHICLE DAMAGE CODING: 1-13. SEE DIAGRAM ON RIGHT. 14. UNDERCARRIAGE 17. DEMOLISHED 15. TRAILER 18. NO DAMAGE 16. OVERTURNED 19. OTHER				Cost of repairs to any one vehicle will be more than \$1000. <input type="checkbox"/> Unknown/Unable to Determine <input type="checkbox"/> Yes <input type="checkbox"/> No																			
1	Reference Marker	Coordinates (if available) Latitude/Northing: _____ Longitude/Easting: _____	Place Where Accident Occurred: County <u>Erie</u> City <input checked="" type="checkbox"/> Village <input type="checkbox"/> Town of <u>Buffalo</u> Road on which accident occurred <u>Main St</u> (Route Number or Street Name) at 1) intersecting street <u>Amherst St</u> (Route Number or Street Name) or 2) _____ of _____ (Milepost, nearest intersecting Route Number or Street Name)																					
1	Accident Description/Officer's Notes Vehicle 1 was traveling southbound on Main St approaching a signal at the intersection of Main St and Amherst St. Pedestrian was crossing Main St westbound from E Amherst St in the crosswalk with her mother Candida Johnson DOB 11/27/1983. Vehicle 1 proceeds into intersection striking pedestrian in crosswalk. Video of the incident was pulled and submitted with report.																							
ALL INVOLVED	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	
A	1	1	3	1	26	M	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
B	2	-	-	-	8	F	11	9	6	279	1413	-	-	-	-	-	-	-	-	-	-	-	-	-
C	1	4	1	1	-	M	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
D																								
E																								
F																								
Officer's Rank and Signature Print Name In Full <u>PO John Politowski</u>		Badge/ID No. <u>79</u>		N/CIO No. <u>14370</u>		Precinct/Post Troop/Zone <u>LRRT</u>		Station/Boat/ Sector <u>213</u>		Reviewing Officer		Date/Time Reviewed												

EXHIBIT 1



EXHIBIT 2



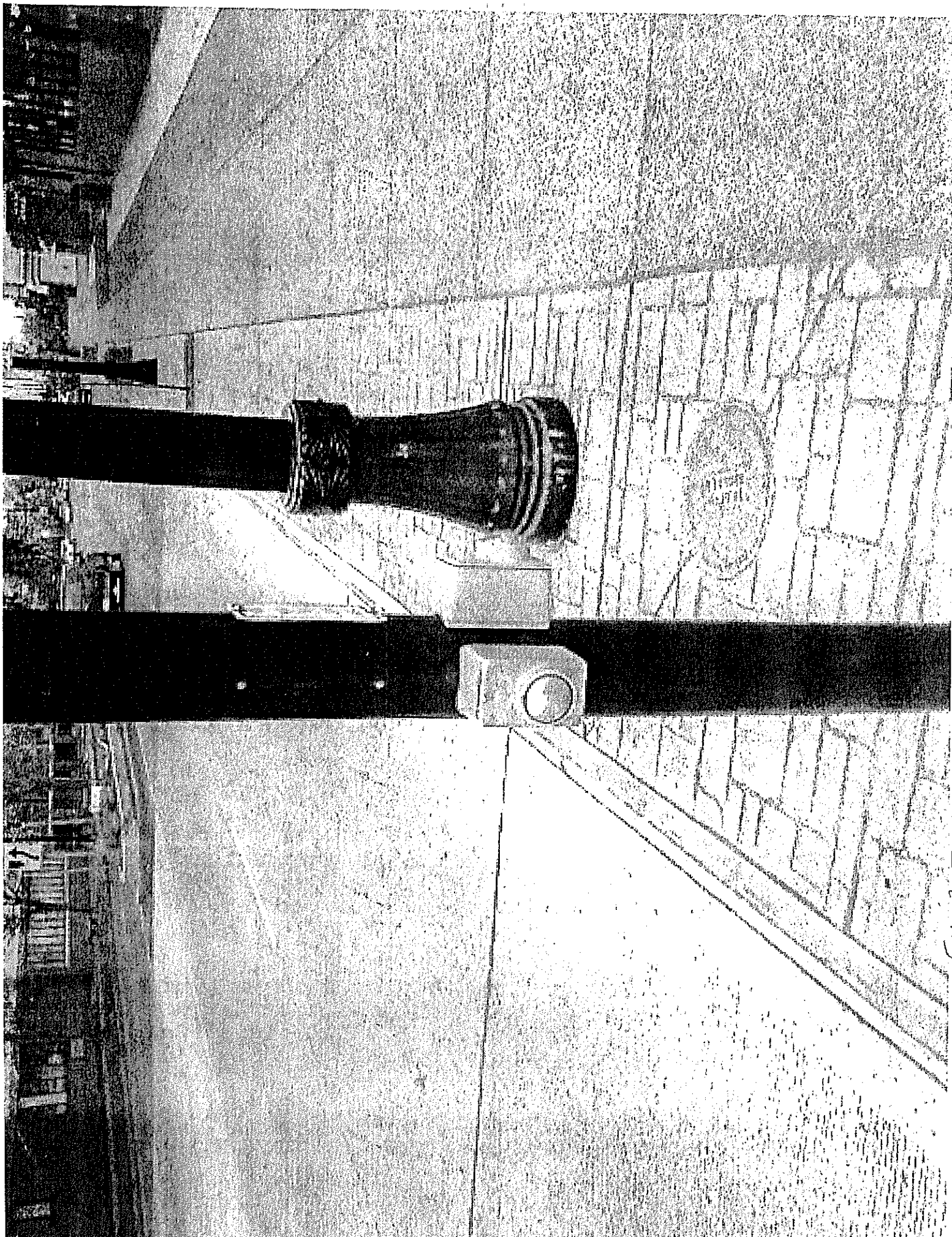


EXHIBIT 3



EXHIBIT 4