COUNTY OF ERIE

JEREMY C. TOTH
COUNTY ATTORNEY

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

JCT/dld

MEMORANDUM

TO: Olivia Owens, Clerk, Erie County Legislature

FROM: Jeremy C. Toth, Erie County Attorney

DATE: April 8, 2026

RE: Transmittal of New Claims Against Erie County

Ms. Owens:

In accordance with the Resolution passed by the Erie County Legislature on June 25, 1987 (Int. 13-14), please find 12 new claims brought against the County of Erie. The claims are as follows:

Claim Name

1. Tyshawn Young-Bey v. Michael Keane, DA
2. Carolyn Stewart v. County of Erie, et al.
3. Adel Darwish v. County of Erie, et al.
4. Nicole Salzman v. County of Erie
5. Jareld Bailey v. County of Erie, et al.
6. Heather Bowers v. County of Erie, et al.
7. Anwer Alwaisi v. County of Erie
8. Linda and Michael Haslinger v. County of Erie
9. William Morrison v. County of Erie, et al.
10. Estate of Melinda Zak v. County of Erie
11. Francine VerHagen v. Erie County Clerk's Office
12. Mamie Glay v. County of Erie

JCT:dld
Attachments

COUNTY OF ERIE

JEREMY C. TOTH
COUNTY ATTORNEY

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

February 25, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Young-Bey, Tyshawn v. Michael Keane, District Attorney*
Document Received:	Summons and Complaint
Name of Claimant:	Tyshawn Young-Bey Plaintiff *Pro Se* 1440 Jefferson Avenue #245 Buffalo, New York 14208
Claimant's attorney:	Plaintiff is proceeding *pro se*.

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

Federal Complaint (For U.S. District Court)

United States District Court
Western District of New York

25 CV 329-S

Plaintiff:
Tyshawn Young-Bey D/ b/a Solar inner God

D/b/a TYSHAWN L YOUNG©®™

Ambassador of Allah C/o 1440

Jefferson Avenue #245 Aboriginal

Mauri Republic Buffalo New York

[14208]

Defendants:

- Buffalo Police Department
- District Attorney Michael J. Keane
- Judge Gary Wilson
- Officers P.O. R. Sullivan, et al.

Case No.: [Leave Blank]
FERERAL CLAIMS **COMPLAINT FOR VIOLATIONS OF CIVIL RIGHTS, CONSTITUTIONAL LAW, AND OTHER CLAIMSCOMPLAINT FOR VIOLATION OF SOVEREIGN RIGHTS, FRAUDULENT CONCEALMENT, AND COLOR OF LAW VIOLATIONS**COMPLAINT FOR VIOLATIONS OF GOD-GIVEN RIGHTS, SOVEREIGNTY, SEPARATION OF POWERS, AND OTHER CLAIMSCOMPLAINT FOR VIOLATIONS OF GOD-GIVEN RIGHTS, SOVEREIGNTY, SEPARATION OF POWERS, UNLAWFUL DETENTION, FRAUDULENT CONCEALMENT, AND PROPERTY THEFT

Complaint for Violation of Civil Rights (42 U.S.C. § 1983)

1. **Jurisdiction & Venue:**
   - This court has jurisdiction under **42 U.S.C. § 1983** and **28 U.S.C. § 1331** for constitutional violations.
   - The events took place in Buffalo, New York, within this court's jurisdiction.

2. **Facts:**
   - On **December 19, 2024**, Buffalo Police entered a **hotel room that was not in my name** without a **warrant**.
   - I was **nude and vulnerable** when officers forcibly entered and interrogated me.
   - Officers **seized my personal property**, including **legal documents, phones, and business records**, without due process.
   - I was **falsely arrested and detained on an expired charge**, violating my **Fourth and Fourteenth Amendment rights**.
   - My **wrongful death case evidence was unlawfully taken**, obstructing justice.
   - **Violation of 1946 Administrative Law and Separation of Powers.**
3. **Legal Claims:**
   - **Unlawful Search & Seizure** (Fourth Amendment Violation)
   - **False Arrest & Unlawful Detention** (Fourteenth Amendment Violation)
   - **Due Process Violation** (Fifth and Fourteenth Amendments)
   - **Obstruction of Justice & Fraudulent Concealment**
   - **Violation of Treaty Rights (Treaty of Peace and Friendship 1787/1836)**
   - **Violation of 1946 Administrative Law and Separation of Powers.**
4. **Relief Sought:**
   - **Immediate return of all seized property.**
   - **Compensatory damages of $5,000,000** for emotional distress and financial loss.
   - **Punitive damages of $10,000,000** against individual officers for misconduct.
   - **Federal injunction** preventing further violations against me.

Signed & Dated,
Tyshawn Young-Bey
C/o 1440 Jefferson Avenue #245
Aboriginal Mauri Republic, Buffalo, New York [14208]

9Solar99@gmail.con*As stated by Marcus Garvey and Noble Drew Ali: "A people without the knowledge of their past history, origin, and culture is like a tree without roots."*

Isaiah 10:1-2: *Woe unto them that decree unrighteous decrees...*
Quran 4:148: *Allah does not like the public mention of evil except by one who has been wronged.*

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, NY 14202
Phone: (716) 551-1700
Source

one tyshawn young-Bey
Ambassador of Allah/God
Aboriginal Blood Heir to the Land
C/o 1440 Jefferson Avenue, #245
Buffalo, New York 14208
Email: 9solar99@gmail.com

Plaintiff

v.

Officer P.O.R. Sullivan, et al.
C District, Buffalo, New York

Defendants

DOCUMENTS ENCLOSED:

1. **Complaint / Amendment One & Two**
2. **Affidavit in Good Faith**
3. **Notice to the Clerk for Two Submissions in the Name of the Defendants**
4. **Notice of Lawsuit & Waiver of Summons in the Name of the Defendants**
5. **Service of Process via Sheriff's Office & Process Servers**

Filed in Good Faith & Lawful Standing
Date: **March 24, 2025**

COUNTY OF ERIE

JEREMY C. TOTH
COUNTY ATTORNEY

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

February 25, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Stewart, Carolyn v. County of Erie, et al.*
Document Received:	Notice of Claim
Name of Claimant:	Carolyn Stewart 264 Washington Avenue Kenmore, New York 14217
Claimant's attorney:	Leonard D. Zaccagnino, Esq. Shaw & Shaw, P.C. 4819 South Park Avenue Hamburg, New York 14075

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

STATE OF NEW YORK

CAROLYN STEWART

Claimant

NOTICE OF CLAIM

-vs-

KENMORE-TONAWANDA UNION FREE SCHOOL DISTRICT
1500 Colvin Boulevard
Buffalo, NY 14223

ALEXANDER HAMILTON ELEMENTARY SCHOOL
44 Westfall Drive
Tonawanda, NY 14150

COUNTY OF ERIE
65 Niagara Square
Buffalo, NY 14202

TOWN OF TONAWANDA
2919 Delaware avenue #14
Buffalo, NY 14217

Respondents

This paper received at the
Erie County Attorney's Office
from Jennifer Voll Keron
the 30th day of October, 2025
at 12:07 a.m./p.m.
Assistant County Attorney
Michael J. Liszewski

TO THE RESPONDENTS:

PLEASE TAKE NOTICE, that the claimant claims damages against respondents in accordance with the requirements of General Municipal Law Section 50-e, and states as follows:

1. The name and address of the claimant is:

   Carolyn Stewart
   264 Washington Avenue
   Kenmore, NY 14217

> on the sidewalk adjacent to 44 Westfall Drive in Kenmore, Erie County, New York when she was caused to fall as the result of a dangerous condition, causing claimant to come into contact with the ground, and seriously injuring herself. A photograph of the area where the claimant fell is attached hereto for reference.

8. That the aforesaid incident and the injuries and damages resulting therefrom occurred by reason of the fault, neglect, and carelessness of the respondents, their agents, servants and/or employees, and that said respondents failed to properly, adequately, and safely maintain the aforesaid premises; failed to properly and adequately supervise and control the area where claimant fell on the date of the incident; carelessly and negligently designed the area on said premises where the incident occurred; failed to take the necessary steps to fill in gaps between concrete slabs of the sidewalk adjacent to said property which gaps, upon information and belief, were made by the respondents' agents, servants and/or employees; failed to take the necessary steps and make the necessary observations, which, if taken or made, would have avoided the said incident; and in that the respondents, their agents, servants and/or employees were otherwise careless and negligent.

9. By reason of the aforesaid, the claimant sustained severe, painful and permanent injuries in and about her body including, but not limited to, injuries to her ribs and displaced fracture of olecranon process with intraarticular extension of left ulna, which injury to her wrist resulted in surgical intervention, and was otherwise rendered sick, sore, lame and disabled; was

VERIFICATION

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

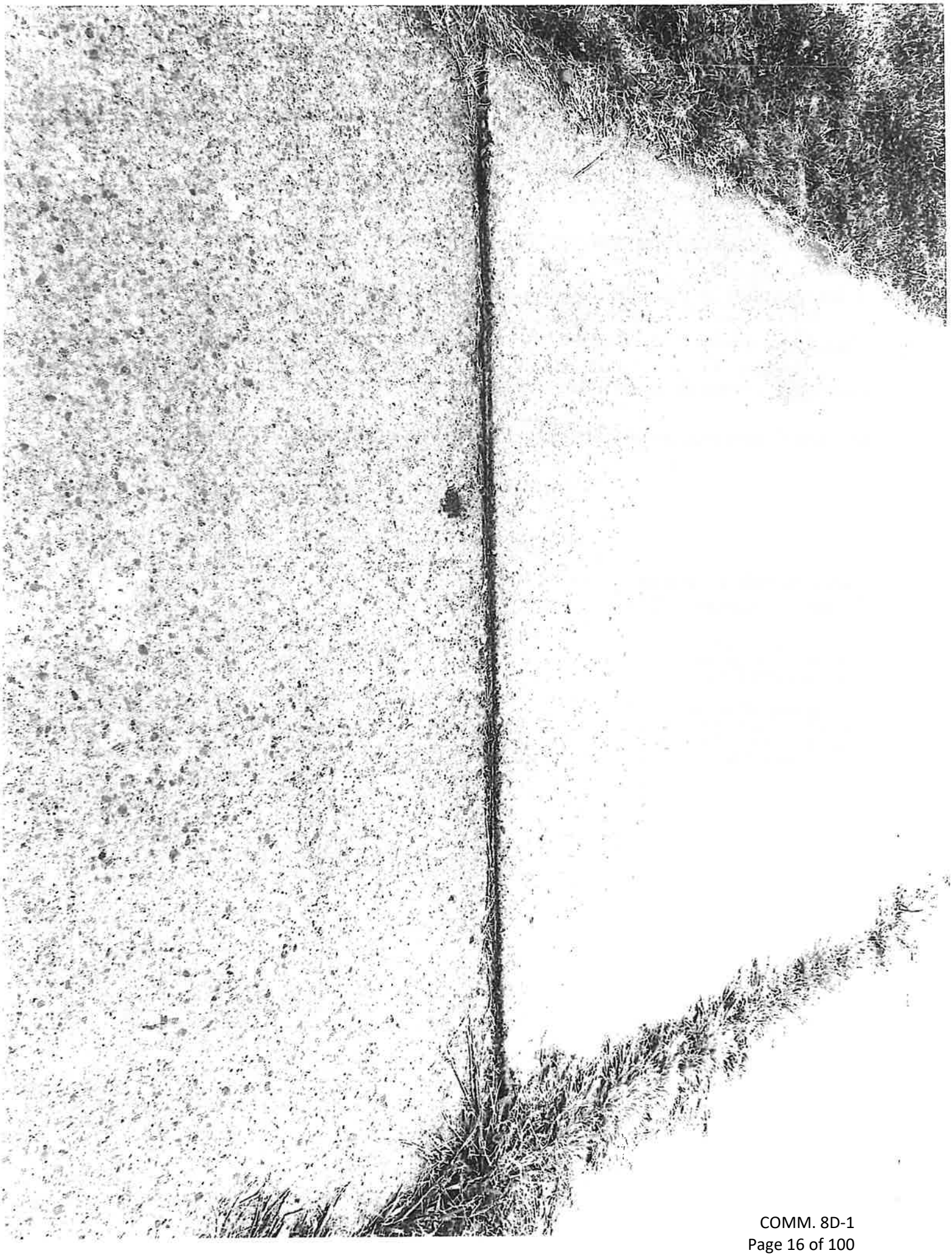
CAROLYN STEWART, being duly sworn, deposes and says that she is the claimant in the within action; that she has read the foregoing Notice of Claim and knows the contents thereof; that the same is true to her own knowledge, except as to the matters therein stated to be alleged upon information and belief,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

Carolyn Stewart

Sworn to before me this
24th day of October 2025.

Notary Public

Leonard D. Zaccagnino
Notary Public, State of New York
Commission Expires Feb. 28, 2027
Erie County



JEREMY C. TOTH
COUNTY ATTORNEY

COUNTY OF ERIE

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 9, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Darwish, Adel v. County of Erie, et al.*
Document Received:	Notice of Claim
Name of Claimant:	Adel Darwish 3341 12th Avenue SE Naples, Florida 34117
Claimant's attorney:	Rikki Davidoff, Esq. Leav & Steinberg, LLP 75 Broad Street, Suite 1601 New York, New York 10004

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

This paper received at the
Erie County Attorney's Office
from Kathleen Hartman on
the 16th day of January, 2026
at 3:05 a.m./p.m.
Michael Liszewski
Assistant County Attorney
Michael J. Liszewski

In the Matter of the Claim of

ADEL DARWISH,

-against-

NEW YORK STATE
DEPARTMENT OF TRANSPORTATION, COUNTY OF ERIE
and THE TOWN OF WEST SENECA

TO: **NEW YORK STATE DEPARTMENT OF TRANSPORTATION**
50 Wolf Road
Albany NY 12232

THE TOWN OF WEST SENECA
1250 Union Road, Rm 212
West Seneca, NY 14224

ERIE COUNTY CLERK
92 Franklin Street
Buffalo, NY 14202

PLEASE TAKE NOTICE that the undersigned claimants hereby make a claim and demand against you as follows:

1. **The name and post-office address of each claimant and claimant's attorneys are:**

CLAIMANTS

Adel Darwish
3341 12th Avenue SE
Naples, FL 34117

ATTORNEYS

LEAV & STEINBERG, LLP
75 Broad Street, Suite 1601
New York, NY 10004
(212) 766-5222

2. The nature of the claim: This claim is made to recover monetary damages for serious personal injuries, cognitive impairment, pain and suffering, emotional distress, loss of enjoyment of life, medical

expenses, and other damages sustained by Claimant ADEL DARWISH, as a result of the negligence, recklessness, carelessness, and wrongful conduct of the respondents, including but not limited to THE DEPARTMENT OF TRANSPORTATION, THE, COUNTY OF ERIE AND THE TOWN OF WEST SENECA and/or other responsible municipal entities, their agents, servants, and employees.

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

On October 26, 2025, at approximately 2:00 PM, claimant ADEL DARWISH was a restrained driver in a motor vehicle owned by his father, traveling at or near Clinton Street and Borden Road, West Seneca, near Buffalo Creek, Erie County, and State of New York.

While lawfully traveling, the vehicle left the roadway and plunged approximately fifty (50) feet down a cliff, landing upside-down. The accident occurred due to the dangerous, defective, and hazardous condition and negligent design of the roadway, including but not limited to the absence of adequate guardrails, and negligent design protective barriers, signage, and roadway safety features, despite a steep and foreseeable drop-off immediately adjacent to the roadway. Attached hereto as **Exhibit "1"** are photographs of the area of the accident as well as the specific defect.

The incident was caused in whole or in part due to the negligence, recklessness and/or carelessness of Respondent THE DEPARTMENT OF TRANSPORTATION, THE COUNTY OF ERIE and THE TOWN OF WEST SENECA in causing and/or allowing a dangerous, defective, hazardous and/or unsafe condition to exist at the aforementioned roadway near Clinton Street and Borden Road, West Seneca, Erie County, New York, near Buffalo Creek, (hereinafter the "Subject Roadway), to wit: in failing to perform the due, timely, necessary and warranted inspections of the aforesaid area; in affirmatively causing and creating the dangerous condition; in negligently designing the road at or near said roadway; in negligently constructing the subject said roadway; in that the negligent design and construction was not studied or

inspected for the creation of possible dangerous or hazardous conditions; in negligently making repairs to the area at or near said roadway; in that the negligent repairs at the time the work was performed on said upon said roadway resulted in the existence of the dangerous and hazardous condition complained of herein; in that negligent repairs at the time the work was performed on said roadway resulted in the existence of the dangerous and hazardous condition complained of herein; in failing to repair, properly repair and timely repair the aforesaid condition; in deriving a special use or benefit from the area; in failing to ascertain the dangers existing thereat; in failing to monitor the condition(s) at the place aforesaid, and further; in causing, permitting and/or allowing a trap to exist at said location; in causing, permitting and/or allowing the existence of a condition which constituted a trap, nuisance, menace and danger to lawful drivers such as claimant; in failing to give claimant adequate and/or timely notice or warning of said condition; in negligently and carelessly causing and permitting the above said place to be and remain in said condition for an unreasonable length of time, resulting in a hazard to claimant and others; in failing to hire adequate and competent personnel to repair said area in a safe and proper condition; in failing to maintain the aforesaid area in a reasonably safe and proper condition; in failing to take the necessary steps and measures to prevent the above-mentioned location from being used while in said dangerous condition; in failing to take suitable and proper precautions for the safety of persons on and using said area; in failing to take any and all reasonable precautions to safeguard against this occurrence; in failing to give claimant an opportunity to avoid this occurrence; in failing to provide adequate, sufficient and/or competent personnel to maintain said area in a safe and proper manner; in failing to place barricades or other warning devices at said place to prevent

claimant and others from traversing thereat; respondents created the aforesaid dangerous and hazardous conditions; in allowing the foregoing to exist with notice; and in the gross, wanton, reckless and willful acts of respondents, their agents, servants and/or employees; in violating the applicable laws, rules, ordinances, statutes and regulations in such cases made and provided; it was otherwise careless, reckless, negligent and failed to exercise reasonable care and prudence in the premises, all without any fault or lack of care on the part of claimant contributing thereto.

4. **The items of damage or injuries claimed are:**

Claimant ADEL DARWISH sustained personal injuries to his head, neck, as well as others, the full extent of which are not known at the present time, and has and will sustain psychological trauma, loss of enjoyment of life, hospital and medical expenses in an effort to alleviate the injuries sustained. This is a claim for the recovery of monetary damages for the medical expenses and serious and permanent personal injuries suffered by Claimant, including, but not limited to pain and suffering.

TOTAL AMOUNT CLAIMED:

ADEL DARWISH.....$10,000,000

Dated: New York, New York
January 15, 2026

Yours, etc.

LEAV & STEINBERG, LLP

By: _____
Rikki Davidoff, Esq.
Attorneys for Claimants
ADEL DARWISH
75 Broad Street, Suite 1601
New York, New York 10004
(212) 766-5222

ATTORNEY'S VERIFICATION

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

RIKKI DAVIDOFF, an attorney duly admitted to practice in the State of New York, deposes and says under the penalties of perjury as follows:

That deponent is an associate of LEAV & STEINBERG, attorneys for the claimants herein; that she has read the foregoing Notice of Claim and knows the contents thereof; that the same is true to deponent's knowledge except as to the matter therein stated to be alleged on information and belief and that as to those matters, deponent believes it to be true.

That deponent's knowledge and information of the matter herein is based upon the claimant's records kept in their attorney's office.

That the reason why the within claim is not signed by the claimant is because the claimant does not reside nor are they domiciled in the county wherein their attorneys maintain their office.

Dated: New York, New York
January 15, 2026

Rikki Davidoff

In the Matter of the Claim of

ADEL DARWISH

NOTICE OF CLAIM

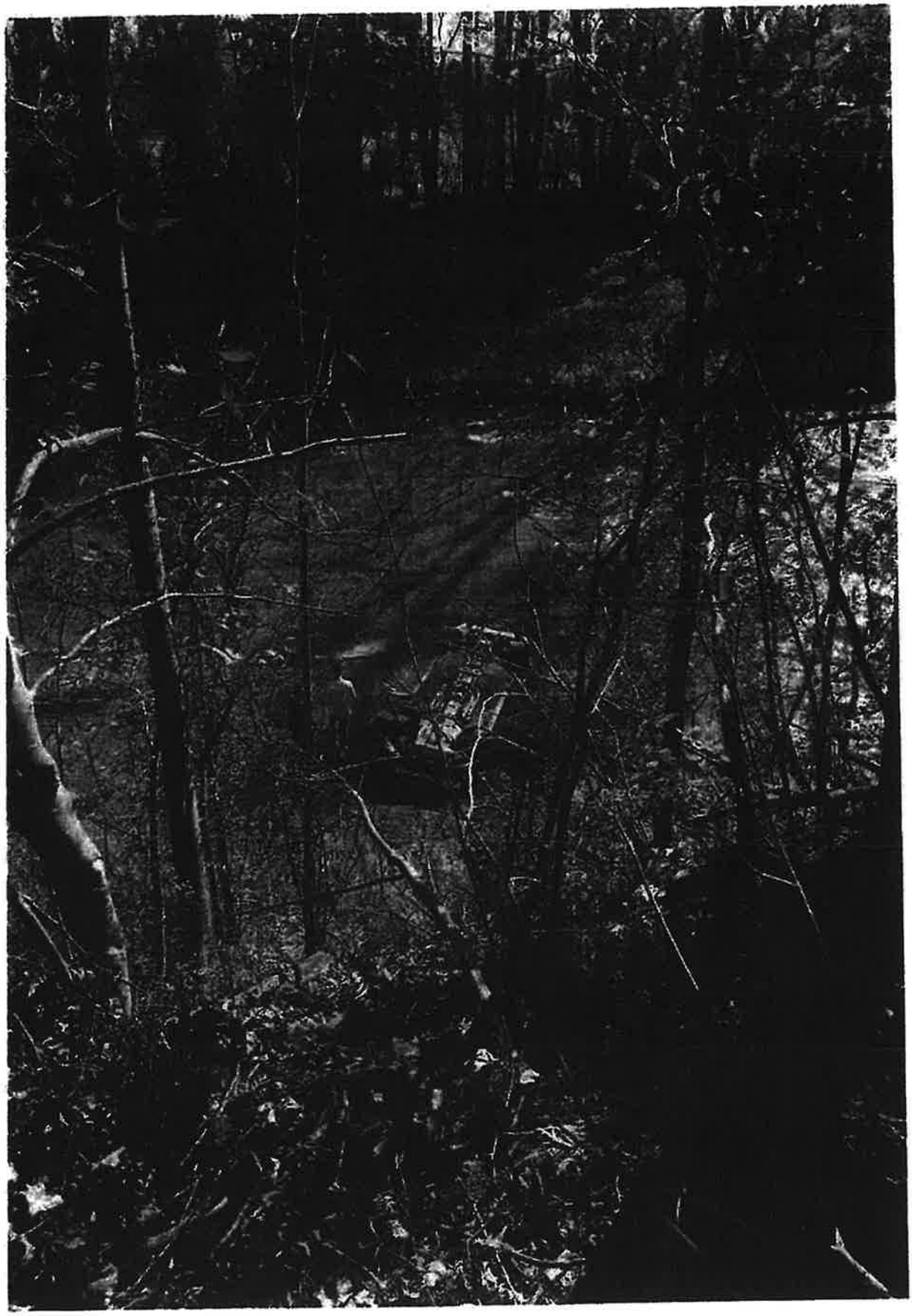
Leav & Steinberg, LLP
Attorneys for Claimant

75 Broad Street, Suite 1601

New York, New York 10004

Telephone No.: (212) 766-5222

EXHIBIT 1



JEREMY C. TOTH
COUNTY ATTORNEY

COUNTY OF ERIE

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 9, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Salzman, Nicole v. County of Erie*
Document Received:	Notice of Claim
Name of Claimant:	Nicole Salzman 943 Three Rod Road alden, New York 14004
Claimant's attorney:	Scott M. Covino, Esq. Brown Chiari LLP 2470 Walden Avenue Cheektowaga, New York 14225

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

NICOLE SALZMAN

Claimant

vs.

NOTICE OF CLAIM

COUNTY OF ERIE, NEW YORK

Respondent

TO: Jeremy Toth, Esq., Erie County Attorney
County of Erie, Department of Law
95 Franklin Street, Room 1634
Buffalo, New York 14202

To whom it may concern:

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

1. The Claimant herein is Nicole Salzman, who resides at 943 Three Rod Road, Alden, New York, 14004.

2. The Claimant herein is represented by the law firm of BROWN CHIARI LLP, 2470 Walden Avenue, Buffalo, New York 14225-4751.

3. The subject claim is for personal injuries and medical expenses sustained by reason of injury to Claimant, Nicole Salzman.

4. The incident giving rise to these damages occurred on or about October 5, 2025, while Claimant was walking on a pedestrian walkway within Highmark Stadium, 1 Bills Drive, Orchard Park, County of Erie, and State of New York.

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

> Upon information and belief, Claimant Nicole Salzman was lawfully walking on a walkway within Highmark Stadium, 1 Bills Drive, Orchard Park, County of Erie, and State of New York, when she was caused to trip and fall on asphalt debris and depressed/cracked/broken/uneven section of the pedestrian walkway. (See photos attached as **Exhibit A**). Upon information and belief, the aforesaid incident was caused by the negligence of Respondent County of Erie, by their agents, servants, and employees in failing to maintain the walkway in a reasonably safe condition for pedestrians; failing to repair the walkway; failing to remove the broken pieces of the depressed/cracked/broken/section of the walkway; failing to warn pedestrians of the defective walkway; failing to warn pedestrians of the dangerous conditions; failing to limit and/or block access to the dangerous condition; failing to use adequate warning measures, including but not limited to cones and/or other warning devices; and in otherwise being negligent, careless and reckless.

6. Claimant Nicole Salzman sustained severe and permanent injuries, including but not limited to, contusions to her left knee, tingling and numbness in the left hand, injuries to the left arm, left shoulder, neck and back, exacerbation of previous spine injuries, and thoracic outlet syndrome, all with associated sequelae, pain and suffering, disability, loss of enjoyment of life, medical and other expenses, and pecuniary injuries.

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

DATED: December 22, 2025

Nicole Salzman

STATE OF NEW YORK)
COUNTY OF ERIE) ss:

On the 22 day of December, 2025, Nicole Salzman, being duly sworn, deposes and says that she is the claimant in this matter; that she has read the foregoing Notice of Claim and knows the contents thereof and that it is true to her personal knowledge, except as to matters stated to be upon information and belief, and as those matters she believes to be true.

Nicole Salzman

Sworn to before me on this
22nd day of December, 2025.

Cheryl A. Pfender
Notary Public

CHERYL A. PFENDER
Reg. No. 01RO6357131
Notary Public, State of New York
Qualified in Erie County
My Commission Expires April 10, 2029

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.

Scott M. Covino, Esq.
BROWN CHIARI LLP
Attorneys for Claimant
2470 Walden Avenue
Buffalo, New York 14225-4751
(716) 681-7190

EXHIBIT A

JEREMY C. TOTH
COUNTY ATTORNEY

COUNTY OF ERIE

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 10, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Bailey, Jareld v. County of Erie, et al.*
Document Received:	Notice of Claim
Name of Claimant:	Jareld Bailey c/o Erie County Holding Center 40 Delaware Avenue Buffalo, New York 14202
Claimant's attorney:	Brittany L. Penberthy, Esq. Penberthy Law Group LLP 227 Niagara Street Buffalo, New York 14201

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

JARELD BAILEY,

Claimant

NOTICE OF CLAIM

-vs-

COUNTY OF ERIE
ERIE COUNTY SHERIFF'S OFFICE
ERIE COUNTY DEPUTY JOHN DOE(S)
ERIE COUNTY SHERIFF, JOHN C. GARCIA, individually and in his official capacity.

Respondents

TO: COUNTY OF ERIE, ERIE COUNTY SHERIFF'S OFFICE, ERIE COUNTY DEPUTY JOHN DOE(S), and SHERIFF JOHN C. GARCIA, individually and in his official capacity

PLEASE TAKE NOTICE that JARELD BAILEY hereby claims and demands against the above-named Respondents damages for personal injuries sustained by him and for medical and hospital expenses incurred and/or to be incurred together with permanent, disfiguring and debilitating injuries as a result of the negligent, careless and reckless acts and omissions of the above-named Respondents, its agents, servants and/or employees, appointees, designees, departments or divisions thereof and in support thereof, the Claimant states the following:

1. The post office address of the Claimant, is Erie County Holding Center, 40 Delaware Avenue, Buffalo, New York 14202; the name and post office address of Claimant's attorney is Brittany lee Penberthy, Esq., of Penberthy Law Group LLP, 227 Niagara Street, Buffalo, New York 14201.

2. That the nature of this claim is for the negligent, careless, reckless, and/or intentional acts or omissions of the above-named Respondents, their agents, servants and/or employees, appointees, designees, departments and divisions thereof, in that JARELD BAILEY was seriously injured when Respondents' failed to properly observe and/or appreciate that JARELD BAILEY was subject to certain "keep aways", which in failing to follow, allowed another inmate to attack Claimant, without proper protections against harm. That said claim arose in the evening on/or about the 25th day of November 2025, the exact date/time of which is known by Respondents' following an internal affairs investigation; that the manner in which said claim arose was that Claimant, while being held within Gulf East at the Erie County Holding Center, located at 40 Delaware Avenue, Buffalo, New York 14202, was caused to be attacked by another inmate despite said inmate being subject to certain keep away protections, causing Claimant to sustain serious and permanent injuries, and additional restrictions greatly limiting the activities of Claimant. The attack on Claimant was not properly prevented or ceased by the Respondents herein, nor was Claimant provided proper protections to avoid the same.

3. That so far as now can be determined, the Claimant has sustained multiple extensive serious injuries externally, internally, and permanently in and about the head, face, teeth, left finger, spine, and nervous system as a result of the aforesaid incident, the full extent of which cannot be fully assessed at the present time. Further, mental trauma has been inflicted and remains as a result of the incident.

4. That by reason of the foregoing injuries, said Claimant became and will continue to be disabled and will continue to suffer great pain, discomfort and disfigurement and has

and may require the services of physicians, surgeons, nurses, hospitals, therapy, prosthetic devices, manipulations and medicines and will continue to incur such expenses in the future; that as a result of the aforesaid injuries and the resulting permanent disabilities said Claimant has been incapacitated from his educational pursuits and/or profession and/or employment and will continue to be incapacitated in the future, and as a result of the aforesaid injuries and permanent disabilities, the future earning capacity of the Claimant and the activities, professional, social and personal endeavors and hobbies of the Claimant and his enjoyment of life will or could be partially and/or totally impaired as a result thereof, all to the damage of said Claimant.

PLEASE TAKE FURTHER NOTICE that the Claimant requests payment of the claims and damages sustained by him as hereinbefore set forth.

DATED: January 9, 2026
Buffalo, New York

PENBERTHY LAW GROUP LLP

By: _____
BRITTANYLEE PENBERTHY, ESQ.
Attorneys for Claimant
Office and P.O. Address
227 Niagara Street
Buffalo, New York 14201
(716) 803-8400

VERIFICATION

STATE OF NEW YORK)

) SS.:

COUNTY OF ERIE)

JARELD BAILEY, being duly sworn, deposes and says that he is the claimant above named; he has read the foregoing claim and knows the contents thereof; the same is true to the knowledge of the claimant except for the matters herein alleged upon information and belief, and as to those matters, he believes them to be true.

Jareld Bailey

JARELD BAILEY

Sworn to before me this

20th day of January, 2026.

Notary Public

BRITTANY LEE [illegible]BERTHY
NOTARY PUBLIC [illegible] NEW YORK
QUA[illegible] [illegible] COUNTY
My Comm[illegible] Expires [illegible] 20[illegible]

JEREMY C. TOTH
COUNTY ATTORNEY

COUNTY OF ERIE

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 10, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Bowers, Heather v. County of Erie, et al.*
Document Received:	Notice of Claim
Name of Claimant:	Heather Bowers 5148 35th Avenue N St. Petersburg, Florida 33710
Claimant's attorney:	Paul K. Barr, Esq. Fanizzi & Barr, P.C. 2303 Pine Avenue Niagara Falls, New York 14301

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

STATE OF NEW YORK
COUNTY OF ERIE

In the Matter of the Claim of

HEATHER BOWERS,
5148 35th Avenue N.
St. Petersburg, Florida 33710,

Claimant,

-vs-

NOTICE OF CLAIM

COUNTY OF ERIE
92 Franklin Street
Buffalo, New York 14202

ERIE COUNTY STADIUM CORPORATION
633 Third Avenue
New York, New York 10017

Respondents.

PLEASE TAKE NOTICE, that the Claimant, HEATHER BOWERS, has and hereby intends to file a Claim against the COUNTY OF ERIE and ERIE COUNTY STADIUM CORPORATION; and in support of said claim states the following:

1. The post office address of the Claimant, HEATHER BOWERS, is 5148 35th Avenue N., St. Petersburg, Florida, 33710.

2. The attorney for the Claimant is Paul K. Barr, Esq. of FANIZZI & BARR, P.C., 7311 Niagara Falls Boulevard, Niagara Falls, New York 14304, Telephone: (716) 284-8888.

3. The Claim arose as follows: On or about November 16, 2025, Claimant, HEATHER BOWERS, sustained personal injuries when she was caused to slip and fall down stairs at or near Gate #5 as a result of slush, snow and ice located at One Bills Drive, Orchard Park, New

York 14127 (hereinafter premises), in the COUNTY OF ERIE and the State of New York. On that day, Claimant, HEATHER BOWERS, was lawfully on the premises when she was caused to incur an injury on the premises due to her slip and fall down stairs on slush, snow and ice and was further injured due to the property that was negligently owned, leased, maintained, inspected and controlled by the aforementioned Respondents.

4. Upon information and belief, Highmark Stadium, commonly known as Bills Stadium, located at One Bills Drive, Orchard Park, New York is secured, owned, leased, maintained, inspected and controlled by the COUNTY OF ERIE and ERIE COUNTY STADIUM CORPORATION.

5. Upon information and belief, Respondents caused, created, knew or should have known about this defective and dangerous condition and failed to remediate it within a reasonable amount of time.

6. Upon information and belief, the incident herein described, and the resultant injuries and damages sustained, were caused as a result of negligence, carelessness, and reckless conduct on the part of the Respondents, COUNTY OF ERIE, and ERIE COUNTY STADIUM CORPORATION, their agents, servants, and employees in failing to provide a safe premises; in failing to correct a known safety risk at the general location of the accident herein mentioned; in failing to maintain the premises free of slippery condition; in failing to maintain and inspect said property in a reasonably safe manner for users thereof; in failing to keep stairways free of slush, snow and ice for the safe and unimpeded travel by the public; in failing to timely correct or remedy the dangerous condition that then and there existed; in failing to prevent the incident from occurring; along with the other acts of negligence, carelessness and recklessness.

7. That the aforesaid COUNTY OF ERIE and ERIE COUNTY STADIUM CORPORATION, by and through their agents, servants, and employees had actual or constructive notice of the dangerous condition on the property of the Bills Stadium and had actual and constructive notice of the conditions that then and there existed at the time of the incident. Agents, servants and employees of the Respondents knew or in the exercise of reasonable care, should have known of the potential danger of hazards and/or defects on the aforementioned property, but failed to take any corrective measures; and further failed to take preventative measures to correct the hazardous condition prior to this event, despite having actual and/or constructive notice of the same. Agents, servants and employees of the Respondents herein knew of the injuries Claimant, HEATHER BOWERS, sustained. Agents, servants and employees of the Respondents herein were present on the premises on the date of the incident, failed to aid and/or warn the public of the dangerous condition that existed.

8. The Claim of HEATHER BOWERS is for personal injuries and pain and suffering, including, without limitation, injury to her right side of her body, including not limited to right hip and right tibial plateau fracture, and being rendered sick, sore, lame, and disabled. The claim is also for consequential damages.

9. That the said injuries were occasioned solely and wholly as a result of the negligence of the Respondents, COUNTY OF ERIE and ERIE COUNTY STADIUM CORPORATION, by and through their agents, servants and employees and without any negligence on the part of the Claimant contributing thereto.

WHEREFORE, Claimant, HEATHER BOWERS, requests that the Respondents, COUNTY OF ERIE and ERIE COUNTY STADIUM CORPORATION, compensate the Claimant for her injuries.

PLEASE TAKE FURTHER NOTECE that unless said claim paid and adjusted by the Respondents and each of them within thirty (30) days from the date of service of this Notice of Claim, said Claimant fully intends to commence an action in Supreme Court of the State of New York against the COUNTY OF ERIE, ERIE COUNTY STADIUM CORPORATION, together with other defendants, for a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction; together with interest, costs and disbursements in this action.

DATED: Niagara Falls, New York
December 17, 2025

By: _____

Paul K. Barr, Esq.
FANIZZI & BARR, P.C.
Attorneys for Claimant
7311 Niagara Falls Boulevard
Niagara Falls, New York 14304
Telephone: (716) 284-8888

VERIFICATION

STATE OF FLORIDA)
COUNTY OF Pinellas) SS.:

HEATHER BOWES being duly sworn, says: I am the Claimant in the above entitled matter; I have read the foregoing Notice Of Claim and know its contents; the same is true to my own knowledge, except to those matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

Heather Bowers

Sworn to before me this 5th day of January, ~~2023~~ 2026 C.S.

Notary Public

NOTARY PUBLIC STATE OF FLORIDA

CASEY STINEMAN
Commission # HH 274976
Expires June 12, 2026

JEREMY C. TOTH
COUNTY ATTORNEY

COUNTY OF ERIE

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 11, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Alwaisi, Anwer v. County of Erie*
Document Received:	Notice of Claim
Name of Claimant:	Anwer Allwaisi 86 Pyle Court Tonawanda, New York 14150
Claimant's attorney:	Michael M. Blotnik, Esq. Steiner & Blotnik 300 Delaware Avenue Buffalo, New York 14202

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

STATE OF NEW YORK
SUPREME COURT: COUNTY OF ERIE

ANWER ALWAISI
86 Pyle Court
Tonawanda, New York 14150

Claimant,

- against -

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

Respondent.

NOTICE OF CLAIM

PLEASE TAKE NOTICE that the undersigned attorney, Michael M. Blotnik, Esq., on behalf of the claimant, Anwer Alwaisi, presents this **Notice of Claim** against the County of Erie.

1. The name and address of the claimant and of his attorney are:

Claimant: Anwer Alwaisi, 86 Pyle Court, Tonawanda, New York 14150.

Claimant's Attorney: Steiner & Blotnik, P.C., Richard J. Steiner, Esq., 300 Delaware Avenue, Buffalo, New York 14202.

2. This is a claim for property damage and personal injuries arising out of a motor vehicle collision involving an Erie County highway snowplow truck. The collision was caused by the negligence, carelessness, and recklessness of Erie County, its agents, and its employees in the ownership, operation, supervision, and control of the County snowplow vehicle.

3. On December 7, 2025 at approximately 3:27 p.m. near 1870 Military Road in Buffalo, New York in the County of Erie, claimant was traveling southbound on Military Road, lawfully and prudently within the right lane of travel. An Erie County plow truck was traveling

southbound in the adjacent left lane. The plow truck attempted to cross over the right lane to access the Erie County highway barn lot. In doing so, the County driver failed to ensure that the lane change and turn could be completed safely and failed to yield to claimant's vehicle, striking the rear driver's side quarter panel of claimant's vehicle.

4. As a result of the collision caused by the negligence, carelessness, and recklessness of the Erie County plow, claimant sustained personal injuries and property damage to his vehicle in the amount of $8,428.56.

Dated: Buffalo, New York
February 27, 2026

Michael M. Blotnik

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

Michael M. Blotnik, duly sworn, deposes and states: That he is the attorney for the claimant, Anwer Alwaisi, in this action: that he has read the foregoing Notice of Claim; that he knows the contents thereof; and that the same is true to his own knowledge except as to those matters alleged to be upon information and belief, and that as to those matters he believe it to be true.

Michael M. Blotnik

Sworn to before me this
27th day of February 2026

Notary Public

RICHARD J. STEINER
Notary Public, State of New York
Qualified in Erie County
No. 02ST5059768
My Commission Expires 05-06-2014 26

ERIE COUNTY DEPARTMENT OF LAW
MEMORANDUM

Date: March 11, 2026

To: Sarah Urbino, Sr. Special Investigator – ECDSS/SID
43 Court Street, Room 202
Buffalo, New York 14202

From: Jeremy C. Toth, Erie County Attorney JCT

cc: Suzanne C. Starr. Assistant County Attorney

Subject: DSS Lien
Alwaisi, Anwer v. County of Erie

File No. 13-20260019

Ms. Urbino:

Our office received notice of a potential claim in the above matter (please see attached).

The claim arose on 12/07/2025. Claimant is represented by:

Michael M. Blotnik, Esq.
Steiner & Blotnik
300 Delaware Avenue
Buffalo, New York 14202

Please advise whether DSS has a lien as well as the amount of the lien so that we may preserve the County's rights in the event of settlement or judgment. Thank you for your assistance.

JCT:dld

Attachment

JEREMY C. TOTH
COUNTY ATTORNEY

COUNTY OF ERIE

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 12, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Haslinger, Linda and Michael v. County of Erie*
Document Received:	Notice of Claim
Name of Claimant:	Linda and Michael Haslinger 747 Chestnut Hill Ridge Road Lockport, New York 14094
Claimant's attorney:	Michael P.J. McGorry, Esq. The McGorry Law Firm, LLP 403 Main Street, Suite 51 Buffalo, New York 14203

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

LINDA HASLINGER AND
MICHAEL HASLINGER, HER SPOUSE

Claimant,

v.
COUNTY OF ERIE

Respondents.

NOTICE OF CLAIM

TO: The COUNTY OF ERIE

PLEASE TAKE NOTICE, that LINDA AND MICHAEL HASLINGER, the Claimants, by their attorney, Michael McGorry of the McGorry Law Firm as and for their Notice of Claim against the County of Erie and Erie Community College states as follows:

1. The name and post office address of the Claimants are LINDA and MICHAEL HASLINGER, 747 Chestnut Hill Ridge Road, Lockport, NY 14094

2. The name and post office address of the Claimant's attorney is Michael McGorry, McGorry Law Firm, LLP, 403 Main St., Suite 515, Buffalo, NY 14203; Phone Number (716) 854-6525 x 320

3. Upon information and belief, the County of Erie and Erie Community College, State of New York State of New York System (SUNY) were the owners and/or responsible parties of a certain premises commonly known as "Lot 7" located at Abbott Road and Southwestern Blvd., Orchard Park, New York, situated across Abbott Road and Southwestern Blvd. from Highmark Stadium, 1 Bills Drive, Orchard Park, New York as shown on the attached map of Stadium grounds. The

Orchard Park, New York as shown on the attached map of Stadium grounds. The injury occurred in the vicinity of the cement stairway exiting the stadium into Lot 7 parking lot. While traversing into the lot area Linda Haslinger was caused to trip over the snow-covered blades of a forklift whose fork blades were placed into the general walkway for persons leaving the stadium.

4. The date and time upon which the incident complained of on the above-named premises occurred was December 17, 2025 at approximately 5:00 PM.

5. The nature of the claim is for medical bills, pain and suffering and permanent injury, in an amount yet to be determined.

6. That the hazardous and dangerous condition consisted of a dangerous and defective condition which existed included the defective and dangerous location of the Forklift blades which were facing into the walking area and which were snow covered.

7. The way the claim arose is that the Claimant, Linda Haslinger, while lawfully on the premises, was caused to fall due to a hazardous and dangerous condition as set forth in paragraph 6 above.

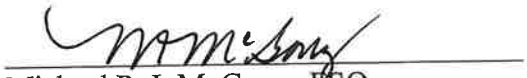
8. That the occurrence aforesaid and the injuries of the Claimant were sustained by reason of the negligence and misconduct of the Respondents in allowing a dangerous condition to unreasonably exist, to continue to exist, and allowing said premises to continue to remain in an unreasonably dangerous, unsafe, and defective condition.

9. The Claimant sustained serious personal injuries to her left and right upper extremity, including torn rotator cuffs and damage to the associated anatomy

of the left and right arms and shoulders which caused conscious pain and suffering, the need for painful medical treatment and possible surgery. Therefore, Claimant makes claim for her conscious pain and suffering, personal injuries, and her economic loss, medical expenses, prescription expenses, miscellaneous expenses, and all further economic loss yet to be determined. The Claimant will seek recovery for all damages reasonably necessarily flowing from this incident. In addition, Michael Haslinger will seek damages for his loss of consortium and loss of services due to his wife's injuries.

WHEREFORE, the Claimants requests compromise of this claim and if such claim is not paid within a reasonable period, it is the intention of the Claimants to commence an action against the above-named Respondents.

DATED: Buffalo, New York
January 22, 2026



Michael P. J. McGorry, ESQ.
MCGORRY LAW FIRM, LLP
Attorneys for claimants
403 Main Street, Suite 515
Buffalo, New York 14203
Phone: (716) 854-6525 X 320

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

I, LINDA HASLINGER and MICHAEL HASLINGER, are the Claimants in the above-entitled action. We have read the foregoing Notice of Claim and know the contents thereof. The contents are true to our own knowledge except as to matters therein stated to be alleged upon information and belief, and as to those matters, I believe them to be true.

LINDA HASLINGER

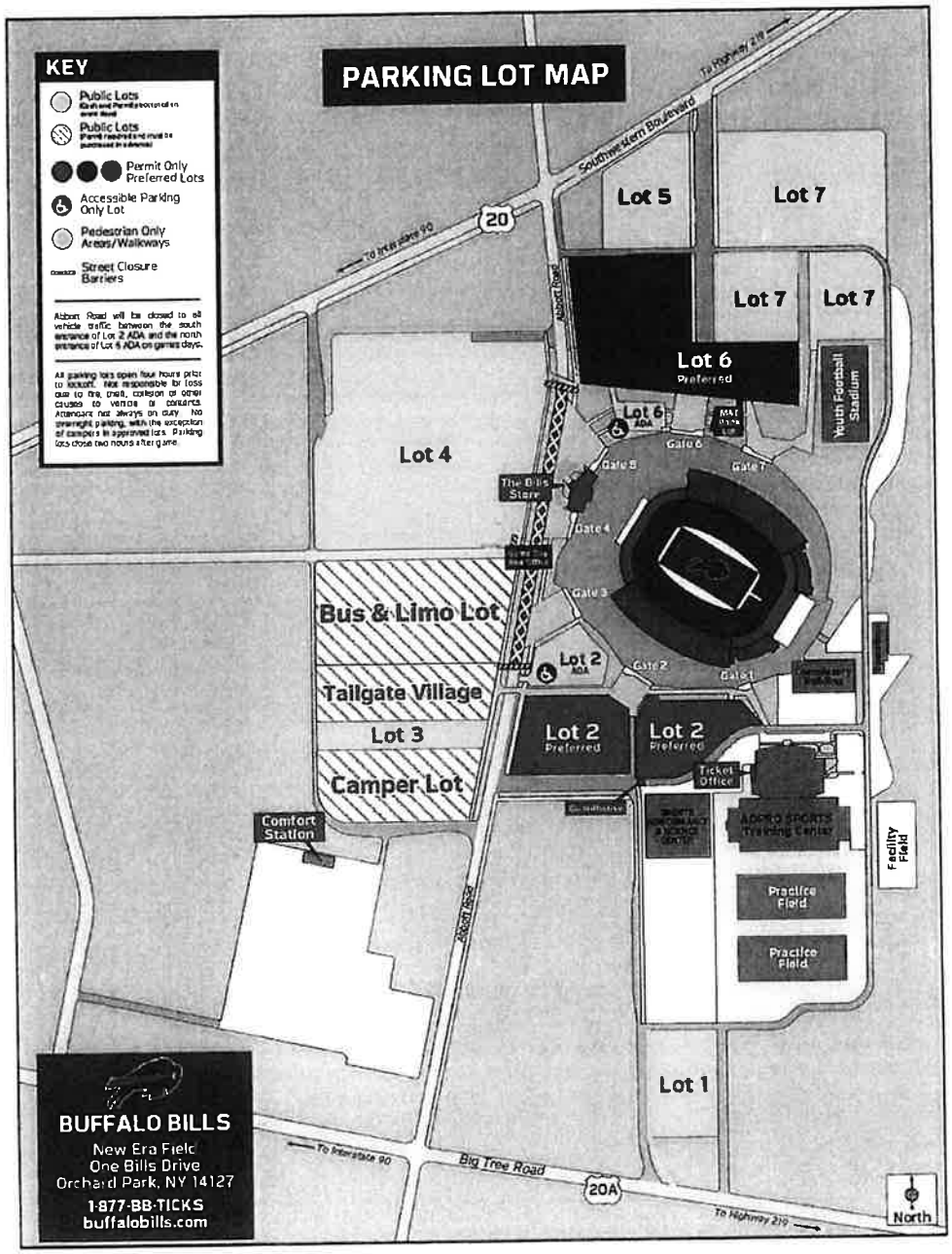
Michael Haslinger

Sworn to before me this 22nd th day of January 2026.

MICHAEL P.J. McGORRY
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 02MC4956487
QUALIFIED IN ERIE COUNTY
My Commission Expires Sept. 25, 20 29

EXHIBIT A

MAP OF STADIUM GROUNDS



JEREMY C. TOTH
COUNTY ATTORNEY

COUNTY OF ERIE

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 12, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Morrison, William v. County of Erie, ECSO, et al.*
Document Received:	Notice of Claim
Name of Claimant:	William Morrison c/o Northeast Ohio Correctional Center 2240 Hubbard Road Youngstown, Ohio 44505
Claimant's attorney:	Brittany L. Penberthy, Esq. Penberthy Law Group LLP 227 Niagara Street Buffalo, New York 14201

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

WILLIAM MORRISON,

Claimant

NOTICE OF CLAIM

-vs-

COUNTY OF ERIE
ERIE COUNTY SHERIFF'S OFFICE
ERIE COUNTY DEPUTY JOHN DOE(S)
ERIE COUNTY SHERIFF, JOHN C. GARCIA, individually and in his official capacity.

Respondents

TO: COUNTY OF ERIE, ERIE COUNTY SHERIFF'S OFFICE, ERIE COUNTY DEPUTY JOHN DOE(S), and SHERIFF JOHN C. GARCIA, individually and in his official capacity

PLEASE TAKE NOTICE that WILLIAM MORRISON hereby claims and demands against the above-named Respondents damages for personal injuries sustained by him and for medical and hospital expenses incurred and/or to be incurred together with permanent, disfiguring and debilitating injuries as a result of the negligent, careless and reckless acts and omissions of the above-named Respondents, its agents, servants and/or employees, appointees, designees, departments or divisions thereof and in support thereof, the Claimant states the following:

1. The post office address of the Claimant, is presently Northeast Ohio Correctional Center, 2240 Hubbard Rd, Youngstown, Ohio 44505; the name and post office address of Claimant's attorney is Brittanylee Penberthy, Esq., of Penberthy Law Group LLP, 227 Niagara Street, Buffalo, New York 14201.

2. That the nature of this claim is for the negligent, careless, reckless, and/or intentional acts or omissions of the above-named Respondents, their agents, servants and/or employees, appointees, designees, departments and divisions thereof, in that WILLIAM MORRISON was seriously injured when Respondents' deputy, ERIE COUNTY DEPUTY JOHN DOE(S) (believed to be Deputy Saurez), negligently and/or purposefully kicked a door into WILLIAM MORRISON which was witnessed by other deputies, all of which failed to provide proper medical aid and made threats against Claimant if the incident were reported. That said claim arose in the afternoon of about the 25th day of October 2025, the exact date/time of which is known by Respondents' by the questioning of the officers of Gulf Sally Port that day; that the manner in which said claim arose was that Claimant, while being held within Gulf Sally Port at the Erie County Holding Center, located at 40 Delaware Avenue, Buffalo, New York 14202, was standing looking through a door's window when ERIE COUNTY DEPUTY JOHN DOE(S) (believed to be Deputy Saurez) deliberately kicked the subject door into the face and body of Claimant, causing Claimant to sustain serious and permanent injuries, and additional restrictions greatly limiting the activities of Claimant. The physical assault on Claimant was not properly prevented or addressed by the Respondents herein, nor was Claimant provided proper protections to avoid the same.

3. That so far as now can be determined, the Claimant has sustained multiple extensive serious injuries externally, internally, and permanently in and about the head and face as a result of the aforesaid incident, the full extent of which cannot be fully assessed at the

present time. Further, mental trauma has been inflicted and remains as a result of the incident.

4. That by reason of the foregoing injuries, said Claimant became and will continue to be disabled and will continue to suffer great pain, discomfort and disfigurement and has and may require the services of physicians, surgeons, nurses, hospitals, therapy, prosthetic devices, manipulations and medicines and will continue to incur such expenses in the future; that as a result of the aforesaid injuries and the resulting permanent disabilities said Claimant has been incapacitated from his educational pursuits and/or profession and/or employment and will continue to be incapacitated in the future, and as a result of the aforesaid injuries and permanent disabilities, the future earning capacity of the Claimant and the activities, professional, social and personal endeavors and hobbies of the Claimant and his enjoyment of life will or could be partially and/or totally impaired as a result thereof, all to the damage of said Claimant.

PLEASE TAKE FURTHER NOTICE that the Claimant requests payment of the claims and damages sustained by him as hereinbefore set forth.

DATED: January 20, 2026
Buffalo, New York

PENBERTHY LAW GROUP LLP

By: _____
BRITTANYLEE PENBERTHY, ESQ.
Attorneys for Claimant
Office and P.O. Address
227 Niagara Street
Buffalo, New York 14201
(716) 803-8400

VERIFICATION

BRITTANY L. PENBERTHY, ESQ., being duly sworn, deposes and says that she is the attorney for the Claimant in this action who resides in a different county than which this attorney maintains an office; and pursuant to CPLR 3020(d)(3), states that that as such is familiar with the facts and circumstances surrounding this action. She has read the foregoing NOTICE OF CLAIM and knows the contents thereof; that the same is true to the knowledge of Plaintiff, except as to those matters therein stated to be alleged upon information and belief, and that as to those matters, she believes it to be true.

By: _____
BRITTANYLEE PENBERTHY, ESQ.
Attorneys for Claimant
Office and P.O. Address
227 Niagara Street
Buffalo, New York 14201
(716) 803-8400

JEREMY C. TOTH
COUNTY ATTORNEY

COUNTY OF ERIE

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 12, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Zak, Melinda (Estate of) by Robert Rose, Proposed Administrator v. County of Erie*
Document Received:	Notice of Claim
Name of Claimant:	Ryan Rose (Proposed Administrator for Melinda Zak) 371 Washington Avenue Kenmore, New York 14217
Claimant's attorney:	Catherine B. Dempsey, Esq. Dempsey & Dempsey 561 Franklin Street Buffalo, New York 14202

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

STATE OF NEW YORK
SUPREME COURT : COUNTY OF ERIE

RYAN ROSE, proposed Administrator of the Estate of MELINDA ZAK, deceased,

NOTICE OF CLAIM

Claimant,

vs.

COUNTY OF ERIE,

Respondent.

TO: COUNTY OF ERIE
95 Franklin Street
Buffalo, NY 14202

SIRS:

PLEASE TAKE NOTICE that claimant, RYAN ROSE, pursuant to statutes in such cases, hereby makes a claim against respondent, COUNTY OF ERIE, its agents, servants and employees, in an amount substantially in excess of the jurisdictional limits of all lower courts for the conscious pain and suffering and wrongful death of MELINDA ZAK, and in support of such claim, states as follows:

FIRST: The post office address of claimant is 371 Washington Avenue, Kenmore NY 14217.

SECOND: That Ryan Rose is the son of decedent, Melinda Zak. Ryan Rose is in the process of opening an Estate for the purpose of obtaining Letters of Limited Administration, allowing him to pursue this claim.

THIRD: This claim is against COUNTY OF ERIE, and its agents, servants and/or employees, for their negligent failure to respond to a 911 call. The nature of the claim is one for conscious pain and suffering and wrongful death of Melinda Zak.

FOURTH: The time when the claim arose and the time when the damages herein alleged were sustained was on October 27, 2025.

FIFTH: That the particular place where the damages were sustained was decedent's home at 371 Washington Avenue, Kenmore NY 14217.

SIXTH: Upon information and belief, the nature of the claim against COUNTY OF ERIE, by and through its agents, servants and employees, involves negligent response for care and treatment to Melinda Zak during her 911 call for emergency services on October 27, 2025. Respondent failed to respond to decedent's call for help for shortness of breath, and difficulty breathing and failed to take due cognizance of same; failed to act within the standard of care and transport Ms. Zak to a hospital or health care facility. Melinda Zak suffered tremendous pain and suffering, loss of enjoyment of life and ultimately death. The negligent response by respondents was a direct cause of decedent's pain and suffering and death and has resulted in damages in an amount substantially in excess of the jurisdictional limits of all lower courts.

SEVENTH: That a special duty existed at the time decedent Melinda Zak called for help from respondent, COUNTY OF ERIE.

EIGHTH: That respondent, COUNTY OF ERIE voluntarily assumed a duty to the decedent beyond what was owed to the public.

NINTH: That respondent, COUNTY OF ERIE, assumed through its promises or actions, an affirmative duty to act on behalf of decedent.

TENTH: That respondent, COUNTY OF ERIE, through their agents/servants and/or employees knew or should have known that inaction on their part could lead to decedent's harm.

ELEVENTH: That at the time of this incident there was direct contact between the agents/servants and/or employees of respondent, COUNTY OF ERIE and the decedent Melinda Zak.

TWELFTH: That the decedent justifiably relied on the respondent, COUNTY OF ERIE'S affirmative undertaking.

WHEREFORE, the undersigned respectfully requests that these claims in amounts substantially in excess of the jurisdictional limits of all lower courts be allowed and paid by respondent, COUNTY OF ERIE. In the event that said claim is not allowed and paid, it is claimant's intention to bring a legal action in order to obtain same.

RYAN ROSE

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

RYAN ROSE, 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 his knowledge, except as to those matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

RYAN ROSE

Sworn to before me this
day of January 2026.

Notary Public

SEAN MICHAEL HOLDREN
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01H00017377
QUALIFIED IN ERIE COUNTY
MY COMMISSION EXPIRES 12/01/2027

Yours, etc.,

THE DEMPSEY FIRM PLLC

By:

CATHERINE B. DEMPSEY, ESQ.
Attorneys for claimant
561 Franklin Street
Buffalo, New York 14202
(716) 885-8645

SJL

COUNTY OF ERIE

JEREMY C. TOTH
COUNTY ATTORNEY

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 17, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*VerHagen, Francine C. v. Erie County Clerk's Office*
Document Received:	Verified Petition
Name of Claimant:	Francine C. VerHagen Pro Se Plaintiff PO Box 231 Buffalo, New York 14207
Claimant's attorney:	Claimant is proceeding *pro se*.

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ALBANY

In the Matter of the Application of

FRANCINE C. VERHAGEN,
Petitioner,

for a Judgment Pursuant to Article 78 of the CPLR

-against-

ERIE COUNTY CLERK'S OFFICE;
PATRICK M. BALKIN, ESQ.;
NEW YORK STATE OFFICE OF COURT ADMINISTRATION
(Administrative Capacity);
HON. PETER A. WEINMANN (Administrative Capacity Only);
HON. AMY MARTOCHE (Administrative Judge, 8th JD);
BRANDON A. PORTIS, ESQ. (Principal Court Attorney, 8th JD);
HON. JOHN LICATA (Supervising Judge, 8th JD);
MARY KOHLBACHER (Administrative Staff, 8th JD),

Index No. 912430-25

NOTICE OF PETITION

PLEASE TAKE NOTICE that upon the Verified Petition dated November 20, 2025 (NYSCEF Doc. No. 1) and the exhibits previously filed in this matter on the NYSCEF docket, and upon all prior proceedings herein, the undersigned Petitioner will apply to this Court at Supreme Court of the State of New York, County of Albany, 16 Eagle Street, Albany, New York, before the Honorable Court at Part ___ on the 3rd day of April, 2026 at 9:30 a.m., or as soon thereafter as counsel may be heard, for a judgment pursuant to CPLR Article 78 granting the relief requested in the Verified Petition.

RELIEF REQUESTED

Petitioner seeks the relief set forth in the Verified Petition, including but not limited to:

1. Vacatur and annulment of the recording and indexing of the deed dated April 1, 2025 for 81 Pearl Terrace, Elma, New York;
2. Directing the Erie County Clerk to mark the recorded instrument void and suspend further transfers pending judicial review;
3. Declaring that the recording violated the federal bankruptcy automatic stay and occurred without Petitioner's lawful signature or consent;
4. Compelling administrative review by the Office of Court Administration concerning administrative and fiduciary failures; and
5. Granting such other and further relief as the Court deems just and proper.

DOCUMENTS INCORPORATED BY REFERENCE

To avoid duplicative filing and service, Petitioner incorporates by reference the materials already filed on the NYSCEF docket pursuant to CPLR 2103(e) and Uniform Rule 202.5-b, including:

- Exhibits A–H – NYSCEF Doc. Nos. 4–11, 13

Copies of these documents are available through the NYSCEF system and will be provided upon request.

ANSWERING PAPERS

Respondents must serve answering papers, if any, upon the Petitioner and file such papers with the Court via NYSCEF in accordance with CPLR Article 78.

Dated: March 4, 2026

Buffalo, New York

F VerHagen, Pro Se

Francine C. VerHagen
Petitioner Pro Se
PO Box 231
Buffalo, NY 14207
Email: fverhagen1618@gmail.com
Phone: (716) 949-8789

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ALBANY

In the Matter of the Application of

FRANCINE C. VERHAGEN,
Petitioner,

for a Judgment Pursuant to Article 78 of the CPLR

-against-

ERIE COUNTY CLERK'S OFFICE;et. al.

Index No. _____ (to be assigned)

VERIFIED PETITION UNDER ARTICLE 78

I. Preliminary Statement

1. Petitioner Francine C. VerHagen brings this proceeding to review administrative and ministerial acts that exceeded lawful authority and violated state and federal law in connection with the recording of a deed for her former marital residence, 81 Pearl Terrace, Elma, New York 14059.
2. On April 3 2025 the Erie County Clerk accepted for recording a deed executed solely by Jason Hill transferring Petitioner's interest to John Francis Driscoll IV and Caitlin Marie Driscoll. The transfer occurred (a) without Petitioner's signature or consent, (b) during an active bankruptcy stay in Case No. 24-10552 (W.D.N.Y.), and (c) while a valid UCC-1 lien remained of record.
3. The sale was facilitated by attorney Patrick M. Balkin, whose IOLA account was designated by court order dated March 12 2025 (NYSCEF Doc No. 529) to temporarily hold proceeds. He thereafter acted as closing attorney for Plaintiff Hill and disbursed funds despite notice of the bankruptcy and lien.
4. These acts constitute administrative actions taken in excess of jurisdiction, in violation of lawful procedure, and arbitrary and capricious within the meaning of CPLR § 7803.

II. Parties and Jurisdiction

5. Petitioner: Francine C. VerHagen, 80 Delham Ave, Buffalo NY 14216.

6. Respondent : Erie County Clerk's Office is responsible for recording and maintaining land records under Real Property Law §§ 291–317.

7. Respondent: Patrick M. Balkin, Esq., acted as escrow custodian and closing attorney in the challenged transaction.

8. Respondent: Office of Court Administration ("OCA") supervises the administrative functions of the Unified Court System and is responsible for administrative oversight when court clerks or officers fail to perform ministerial duties.

9. Respondent: Hon. Peter A. Weinmann is named solely in his administrative capacity for: (a) failing to act on required motions, (b) presiding despite statutory conflicts, (c) administrative involvement in the deed transfer, (d) acting without jurisdiction during Petitioner's bankruptcy stay, and (e) administrative mishandling of filings. No judicial determinations are challenged.

10. Respondent: Hon. Amy Martoche, Administrative Judge of the 8th JD, declined to reassign the matter despite written statutory conflict.

11. Respondent: Brandon A. Portis, Esq., issued the November 20, 2025 denial letter on behalf of the Administrative Judge's Office, constituting a final administrative determination.

12. Respondent: Hon. John Licata, Supervising Judge, refused to assign a neutral judge to review Petitioner's recusal motion, perpetuating the conflict.

13. Respondent: Mary Kohlbacher acknowledged and processed Petitioner's October 31 and November 10 reassignment requests, participating in the administrative chain leading to the adverse determination.

14. Venue is proper in Albany County pursuant to CPLR § 7804(b) because the proceeding challenges statewide administrative action of OCA and because the 8th Judicial District is structurally conflicted and cannot adjudicate a matter involving its own administrative conduct.

III. Factual Background

15. Petitioner and Jason Hill were parties to Supreme Court Index No. 800049/2022.

16. On February 27 2025 Hill entered a contract to sell 81 Pearl Terrace as Hill & VerHagen, before any court authorization.

17. On March 12 2025 Justice Weinmann signed an order permitting Hill to sign real-estate documents on Petitioner's behalf but requiring that any sale comply with bankruptcy-court approval and contain no removal of liens.

18. Despite this limitation, Hill executed a deed on April 1 2025 purporting to convey Petitioner's interest to the Driscolls, and the Erie County Clerk recorded it on April 3 2025.

19. At that time, the bankruptcy case and automatic stay under 11 U.S.C. § 362 were active, and a UCC-1 lien in Petitioner's name remained of record.

20. Patrick M. Balkin, Esq., held and distributed proceeds through his IOLA account without bankruptcy-court authorization and contrary to the limitations of the order.

21. Petitioner objected to the transaction through motions and appeals filed in the underlying case (NYSCEF Docs 636, 684, 685, 846, 847). No administrative correction occurred.

22. The Clerk's recording and failure to mark the deed void constitute ministerial acts performed without jurisdiction and in violation of lawful procedure.

23. On October 31, 2025, Petitioner emailed the Administrative Judge's Office requesting reassignment due to: (a) Judge Weinmann's administrative involvement in the underlying property transfer, (b) his failure to act on motions concerning the deed, (c) the active conflicts created by pending Article 78 and § 1983 matters, and (d) his presiding during Petitioner's federal bankruptcy stay.

24. On November 10, 2025, Respondent Kohlbacher acknowledged receipt of the reassignment request, confirming it was forwarded for review.

25. On November 20, 2025, Respondent Portis, acting for Respondent Martoche,issued a written denial of reassignment. This constitutes a final administrative determination.

26. Despite these conflicts, Petitioner's Article 78 against the Clerk was assigned to Respondent Weinmann, the very official whose administrative conduct is at issue, rendering the 8th Judicial District per se conflicted.

IV. Causes of Action (CPLR § 7803)

First Cause – Act Without or in Excess of Jurisdiction (§ 7803[2])

Respondents exceeded their authority by recording and processing a transfer made during a federal bankruptcy stay and without a valid signature from the owner of record.

Second Cause – Violation of Lawful Procedure (§ 7803[3])

Respondents failed to ensure that the deed complied with Real Property Law §§ 306-309 and bankruptcy requirements, accepting an instrument facially defective on its face.

Third Cause – Arbitrary and Capricious Action (§ 7803[3])

Despite documented notice of bankruptcy status and filed objections, Respondents allowed recording and disbursement of proceeds without judicial review or correction.

Fourth Cause – Failure to Perform Duty Enjoined by Law (§ 7803[1])

The Clerk and OCA failed to preserve accurate public records and to institute review of fiduciary conduct once the defects were brought to their attention.

Fifth Cause – Administrative Failure to Reassign Despite Statutory Conflict

Respondents Weinmann, Martoche, Portis, Licata, and Kohlbacher acted arbitrarily, capriciously, and contrary to Judiciary Law § 14 and 22 NYCRR§ 100.3(E)(1) by refusing to reassign Petitioner's matter despite bona fide,documented conflicts. Their refusal constitutes an administrative failure to perform a nondiscretionary duty and an abuse of administrative authority,reviewable under CPLR § 7803(1) and (3).

V. Relief Requested

Petitioner respectfully asks that this Court:

1. Vacate and annul the recording and indexing of the April 3 2025 deed for 81 Pearl Terrace;
2. Direct the Erie County Clerk to mark the recorded instrument void pending further order of the Court;
3. Declare that the transfer violated 11 U.S.C. § 362 and Real Property Law §§ 291 et seq.;
4. Compel the Office of Court Administration to review and report on the administrative handling of this matter and issue corrective guidance regarding escrow custodians in matrimonial cases; and
5. Grant such other and further relief as this Court deems just and proper.

VI. Property Description

All that tract or parcel of land situated in the Town of Elma, County of Erie, State of New York, being part of Lot Nos. 30 and 35, Township 10, Range 6 of the Buffalo Creek Reservation, and further distinguished as Subdivision Lot No. 7 on a map entitled *"Pearl Heights Subdivision,"* filed in the Erie County Clerk's Office under Cover No. 2043, commonly known as 81 Pearl Terrace, Elma NY 14059.

VII. Verification by Affirmation (CPLR § 2106)

I, **Francine C. VerHagen**, affirm under penalty of perjury that I am the Petitioner in this proceeding; I have read the foregoing Verified Petition and know its contents; the same is true to my knowledge except as to matters stated on information and belief, and as to those matters I believe them to be true.

Dated: November 20, 2025 Buffalo, New York

Francine C. VerHagen
Petitioner Pro Se
PO Box 231 • Buffalo NY 14207
Email: fverhagen1618@gmail.com Phone: (716) 949-8789

EXHIBIT INDEX (Article 78 Proceeding)

Exhibit	Description	NYSCEF Doc No.(Index# 800049/22)
A	Bankruptcy Petition and Automatic Stay Notice (W.D.N.Y. Case No. 24-10552)	450,870
B	Recorded Deed & March 12 2025 Order Authorizing Hill's Signature on Behalf of Petitioner	690
C	Affidavit of Plaintiff	689
D	UCC-1 Filing (Active Lien)	688
E	Petitioner's Motions and Appeals (Notice of Appeal and Reverse-Deed Motions)	636, 684, 685, 846, 847

COUNTY OF ERIE

JEREMY C. TOTH
COUNTY ATTORNEY

KRISTEN M. WALDER
DEPUTY COUNTY ATTORNEY

DEPARTMENT OF LAW

March 30, 2026

Ms. Olivia Owens, Clerk
Erie County Legislature
92 Franklin Street. 4th Floor
Buffalo, New York 14202

Dear Ms. Owens:

In compliance with Resolution No. 306 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:	*Glay, Mamie v. County of Erie*
Document Received:	NYS Division of Human Rights Charge of Discrimination
Name of Claimant:	Mamie Glay 891 Richmont Avenue Buffalo, New York 14222
Claimant's attorney:	Claimant is proceeding *pro se*.

Should you have any questions, please call.

Very truly yours,

JEREMY C. TOTH
Erie County Attorney

JCT:dld
Enc.

NEW YORK STATE
DIVISION OF HUMAN RIGHTS

NEW YORK STATE DIVISION OF HUMAN RIGHTS on the Complaint of MAMIE GLAY, Complainant, v. ERIE COUNTY, Respondent.	COMPLAINT Pursuant to Executive Law, Article 15 Case No. **10246816**

Federal Charge No. 16GC503796

I, Mamie Glay, residing at 891 Richmond Ave, Buffalo, NY, 14222, charge the above named respondent, whose address is 95 Franklin St., Rm. 1634, Buffalo, NY, 14202 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 age, gender identity or expression, sex, race/color, sexual orientation, opposed discrimination/retaliation.

Date most recent or continuing discrimination took place is 2/20/2025.

The allegations are:

1. I am Black bisexual female subjected to sexual harassment. I was 25 years old at the time of filing. I have opposed discrimination/retaliation. Because of this, I have been subject to unlawful discriminatory actions.

2. Please see attached complaint.

Based on the foregoing, I charge respondent with an unlawful discriminatory practice relating to employment because of age, gender identity or expression, sex, race/color, sexual orientation, opposed discrimination/retaliation, 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 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.

RECEIVED
FEB 21 2025
DIVISION OF HUMAN RIGHTS

New York State Division of Human Rights Complaint Form

Individual filing the complaint

Please provide the information requested below.

First Name

Mamie

Middle Intial

Last Name

Glay

Street Address

810 E Ferry St.

City

Buffalo

State

NY

Zip

14211

Are you completing this form for someone else?

No

Your complaint

Jurisdiction

Employment

Employment

Please specify where the discrimination occurred

Employment (including paid internship and domestic workers)

Are you currently working for the employer you are filing against?

Yes

Date of hire

02/20/2024

Position held or applied for

1 year

For employment and internships, how many employees does this person/company have?

20 or more

Acts of alleged discrimination: What did the person/company you are complaining against do? Check all that apply

Sexual harassment
Harassed or intimidated me on any basis indicated here

Basis

Basis of alleged discrimination in employment:

Age (if you are at least 18 years of age; those under 18 are protected for all other characteristics listed below)
Gender Identity or Expression (actual or perceived gender-related identity, appearance, behavior, expression, or other gender-related characteristic regardless of the sex assigned to that person at birth, including, but not limited to, the status of being transgender; complaints involving the need for accommodation of gender dysphoria or other related medical condition can also be filed under disability)
Race/Color (because you are Asian, Black, White, etc.; includes ethnicity; includes traits historically associated with race such as hair texture or hairstyle)
Sex (because of your gender, includes sexual stereotyping, sexual harassment, pregnancy)
Sexual Orientation (heterosexual, homosexual, bisexual, asexual, whether actual or perceived)
Retaliation (if you filed a discrimination case before, were a witness or helped someone else with a discrimination case, or opposed or reported discrimination due to category listed on this page)

Please specify sexual orientation:

Bisexual

Please specify sex:

Female

Please specify race/color:

Black

Please specify gender:

Female

Date of birth

10/11/1999

Please specify what you did to oppose discrimination or how you engaged in protected activity.

I talked to my supervisors but no one listened.

You are filing a complaint against

Entity that discriminated against you:

Name of entity

Erie County Detention Center

Street Address

810 E Ferry

City

Buffalo

State

NY

Zip

14211

In what county or borough did the violation take place?

Erie

Phone Number

Email address

Fax Number

Company Website

Date of the most recent act of alleged discrimination

02/20/2025

Description of discrimination

Tell us more about each act of discrimination that you experienced. Please include dates, names of people involved, and other details. You must explain why you think these acts were discriminatory and how these acts are connected to the protected class (race, color, sex, disability, etc.) you selected previously.
If you have supporting documentation or evidence, you may provide it later.

From my very first day, Cindy forced me to change my name from Mamie Glay, a traditional West African name. She told me that the kids couldn't call me by that name because they would associate it with inappropriate behavior, specifically saying that my body type would make them want to "fuck me." Instead, she insisted I go by "Lil Mimi." This caused confusion among the kids, as they heard staff referring to me as Mamie. Eventually, I began telling them they weren't allowed to call me that, believing it was some sort of legal requirement.
One day, my supervisor, Joe, pulled me aside and asked for my real name. He assured me that I had every right to use my given name and that he would speak to Cindy about it. This terrified me because, from day one of training, everyone warned me about how mean Ms. Cindy could be. Since she was a union member, I feared retaliation.
Beyond this, Cindy and other supervisors frequently commented on my clothing, despite there being no official uniform policy. I did my best to dress modestly, yet every day of training, I was scrutinized and made to feel uncomfortable about my body. Even though I wore the same outfits as my coworkers, I was repeatedly told that my body didn't "look like theirs" and that the kids would be distracted by my figure—especially my backside, despite it being fully covered. They also told me I couldn't dress like the other women simply because I was younger. These comments and constant scrutiny made me feel humiliated. Rumors spread that I dressed this way to impress the young boys and men in the building, implying that I was intentionally seeking attention. I would cry before work, feeling degraded and ashamed, though I never once engaged in inappropriate behavior with anyone.
The harassment escalated when Ron Adams, a senior staff member, began making inappropriate advances. He would walk into the pods, flash cash and debit cards, and openly offer to be my "sugar daddy," promising to buy me anything I wanted if I slept with him. He did this in front of kids, coworkers, and supervisors, who would all laugh and joke about it, saying, "You old and still want that young meat." This man is married, yet his behavior was openly encouraged.
The situation became unbearable when I was assigned to work with Ron alone. I nearly cried seeing him in my pod, knowing he would persistently flirt and make inappropriate comments about buying me designer clothes. One shift, after I told the kids I couldn't bring them snacks because it was against the rules, Ron pulled out a wad of cash in front of them and said, "Oh, you broke? You know I'm your sugar daddy. I can buy you anything—just ask." The kids laughed, but I was humiliated. It felt as if he was reducing me to a sex worker. As a survivor of sexual assault, I froze and felt trapped.
Other staff, including Ms. Yolanda, noticed my discomfort and even told Ron to stop, but he continued. Many people mentioned that he does this to all the new young women. I reported this to my supervisor, Mark Manka, but he did nothing. He claimed he would handle it, yet the situation only worsened—I was forced to work with Ron almost every day after that. At one point, Ron aggressively cornered me in the pod, demanding to know if he was making me uncomfortable. Out of fear, I lied and said no.
Another disturbing incident occurred about four weeks ago in the orange pod. As I was leaving, a youth whistled and cat-called me. When I turned around to address it, Ron chimed in, saying, "You never heard that? They do that to all the bitches with the fat asses." Both he and the youth laughed in my face, making me feel degraded and powerless.
In addition to sexual harassment, I have also faced cultural and ethnic discrimination. My supervisor, Don, repeatedly questioned me about being West African. For two weeks in a row, he asked about my clothing size. I finally gave in and told him a medium, hoping he would stop. Instead, he continued, and when I asked why he was so persistent, he responded, "Because I'm planning on buying you a lingerie set." He said this in front of other coworkers passing by. I still feel uncomfortable around him.
Even Nicole from Admin mentioned that this isn't the first time Don has done this—he has made multiple women uncomfortable in the past. Yet, nothing has been done.
I have been subjected to relentless harassment, discrimination, and humiliation in this workplace. I have faced inappropriate sexual advances, been objectified because of my body, and have been stripped of my cultural identity. Despite reporting these issues, nothing has changed, and in some cases, the retaliation has made things worse. I deserve a workplace where I feel safe, respected, and valued—not one where I am constantly belittled, sexualized, and discriminated against

Declaration

Based on the information contained in this form, I charge the herein named respondent(s) with an unlawful discriminatory practice, in violation of the New York State Human Rights Law.

I also charge the above-named respondent with violating the relevant federal statute(s) where they apply as follows: Title VII of the Civil Rights Act of 1964, as amended (covers race, color, creed, national origin, sex relating to employment/ the Americans with Disabilities Act (ADA) (covers disability relating to employment/ the Age Discrimination in Employment Act (ADEA) as amended (covers ages 40 years of age or older in employment). I hereby authorize SDHR to accept this 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 filed 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. (If you have another action pending and still wish to file, please contact our office to discuss.)

Please initial:

MG

I affirm under penalties of perjury, that I am the complainant herein; that I have read (or had read to me) the foregoing complaint and know the content thereof; that the same is true of my own knowledge except as to the matters therein stated on information and belief; and that as to those matters, I believe the same to be true.

MG

Enter today's date.

02/20/2025

From my very first day, Cindy forced me to change my name from Mamie Glay, a traditional West African name. She told me that the kids couldn't call me by that name because they would associate it with inappropriate behavior, specifically saying that my body type would make them want to "fuck me." Instead, she insisted I go by "Lil Mimi." This caused confusion among the kids, as they heard staff referring to me as Mamie. Eventually, I began telling them they weren't allowed to call me that, believing it was some sort of legal requirement.

One day, my supervisor, Joe, pulled me aside and asked for my real name. He assured me that I had every right to use my given name and that he would speak to Cindy about it. This terrified me because, from day one of training, everyone warned me about how mean Ms. Cindy could be. Since she was a union member, I feared retaliation.

Beyond this, Cindy and other supervisors frequently commented on my clothing, despite there being no official uniform policy. I did my best to dress modestly, yet every day of training, I was scrutinized and made to feel uncomfortable about my body. Even though I wore the same outfits as my coworkers, I was repeatedly told that my body didn't "look like theirs" and that the kids would be distracted by my figure—especially my backside, despite it being fully covered. They also told me I couldn't dress like the other women simply because I was younger. These comments and constant scrutiny made me feel humiliated. Rumors spread that I dressed this way to impress the young boys and men in the building, implying that I was intentionally seeking attention. I would cry before work, feeling degraded and ashamed, though I never once engaged in inappropriate behavior with anyone.

The harassment escalated when Ron Adams, a senior staff member, began making inappropriate advances. He would walk into the pods, flash cash and debit cards, and openly offer to be my "sugar daddy," promising to buy me anything I wanted if I slept with him. He did this in front of kids, coworkers, and supervisors, who would all laugh and joke about it, saying, "You old and still want that young meat." This man is married, yet his behavior was openly encouraged.

The situation became unbearable when I was assigned to work with Ron alone. I nearly cried seeing him in my pod, knowing he would persistently flirt and make inappropriate comments about buying me designer clothes. One shift, after I told the kids I couldn't bring them snacks because it was against the rules, Ron pulled out a wad of cash in front of them and said, "Oh, you broke? You know I'm your sugar daddy. I can buy you anything—just ask." The kids laughed, but I was humiliated. It felt as if he was reducing me to a sex worker. As a survivor of sexual assault, I froze and felt trapped.

Other staff, including Ms. Yolanda, noticed my discomfort and even told Ron to stop, but he continued. Many people mentioned that he does this to all the new young women. I reported this to my supervisor, Mark Manka, but he did nothing. He claimed he would handle it, yet the situation only worsened—I was forced to work with Ron almost every day after that. At one point, Ron aggressively cornered me in the pod, demanding to know if he was making me uncomfortable. Out of fear, I lied and said no.

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In addition to sexual harassment, I have also faced cultural and ethnic discrimination. My supervisor, Don, repeatedly questioned me about being West African. For two weeks in a row, he asked about my clothing size. I finally gave in and told him a medium, hoping he would stop. Instead, he continued, and when I asked why he was so persistent, he responded, "Because I'm planning on buying you a lingerie set." He said this in front of other coworkers passing by. I still feel uncomfortable around him.

Even Nicole from Admin mentioned that this isn't the first time Don has done this—he has made multiple women uncomfortable in the past. Yet, nothing has been done.

I have been subjected to relentless harassment, discrimination, and humiliation in this workplace. I have faced inappropriate sexual advances, been objectified because of my body, and have been stripped of my cultural identity. Despite reporting these issues, nothing has changed, and in some cases, the retaliation has made things worse. I deserve a workplace where I feel safe, respected, and valued—not one where I am constantly belittled, sexualized, and discriminated against

NEW YORK STATE
DIVISION OF HUMAN RIGHTS

NEW YORK STATE DIVISION OF HUMAN RIGHTS on the Complaint of MAMIE GLAY, Complainant, v. ERIE COUNTY, Respondent.	AMENDMENT TO THE COMPLAINT Case No. 10246816

Federal Charge No. 16GC503796

Pursuant to the provisions of § 297.4a of the Human Rights Law (Executive Law, Article 15) of the State of New York, and the New York State Division of Human Rights ("Division"), Rules of Practice § 465.4, the complaint in the aforesaid proceeding is amended as follows:

The Respondent, named in the original complaint as:

Erie County Detention Center

has been modified to the correct legal name for this entity, as follows:

Erie County

The above caption to this document reflects the correct caption for this complaint, as modified and accepted for filing by the Division.

Dated: March 23, 2026
Bronx, New York

STATE DIVISION OF HUMAN RIGHTS

By: _____
Victor P. DeAmelia
Associate Deputy Commissioner of Intake

TO:

Complainant
Mamie Glay
Via Email: mamieglay33@gmail.com

Respondent
Erie County
Via Email: amanda.somma@erie.gov