

CITY OF KINGSTON  
Office of the City Clerk  
Registrar of Vital Statistics  
cityclerk@kingston-ny.gov

Steven T. Noble, Mayor  
Elisa Tinti, City Clerk & Registrar



Deidre Sills, Deputy Clerk  
Susan Mesches, Deputy Registrar

July 26, 2021

Ms. Ruth Morris  
420 E. Main St.  
Middletown, New York 10940

Dear Ms. Morris:

Enclosed please find a notice of claim (#21-20) a notice of claim from Sussman & Associates, 1 Railroad Ave. Suite 3, PO Box, 1005, Goshen, New York 10924, representing Edward James London, Jr. of 25 Van Buren St. 3<sup>rd</sup> Floor, Kingston, New York 12401.

If you have any questions, please contact me at (845) 334-3919.

Very truly yours,

Deidre M. Sills  
Deputy City Clerk

cc: Corporation Counsel  
Common Council  
Andrea Shaut  
KPD

# SUSSMAN & ASSOCIATES

- Attorneys at Law -

MICHAEL H. SUSSMAN  
JONATHAN R. GOLDMAN

1 Railroad Ave. - Suite 3  
P.O. Box 1005  
Goshen, New York 10924

LEGAL ASSISTANT  
SARAH OSBORNE

CHRISTOPHER D. WATKINS  
of Counsel

July 20, 2021

City Clerk  
City of Kingston  
420 Broadway  
Kingston, NY 12401

(845) 294-3991  
Fax: (845) 294-1623  
sussman1@frontiernet.net

Re: *Notice of claim - Edward James London, Jr.*

Dear City Clerk,

Please find the original and two copies of Notice of Claim on behalf of our client, Edward James London, Jr. Kindly date stamp and return one copy for our files using the stamped, self-addressed envelope.

Thanks very much.

Yours truly,

Michael H. Sussman

Enc/

Rec. - C. Mail

CC  
Shaw

# 21-20

Majority  
KPD

STATE OF NEW YORK - COUNTY OF ULSTER  
CITY OF KINGSTON

-----X  
EDWARD JAMES LONDON, JR.

Claimant,

NOTICE OF CLAIM

Vs.

CITY OF KINGSTON,

Respondent.  
-----X

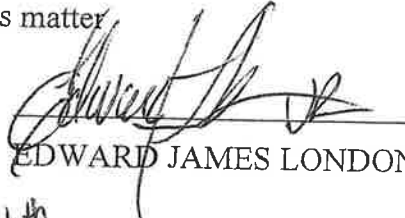
STATE OF NEW YORK                    )  
  ) ss:s.  
COUNTY OF ULSTER                    )

Edward James London, Jr., having been duly sworn, hereby states and deposes upon his own personal knowledge as follows:

1. Claimant, Edward James London Jr., is an American citizen who resides in a single room on the 3<sup>rd</sup> floor of 25 Van Buren Street, Kingston, New York 12401. Mr. London is 51 years of age and was born in Kingston, New York.
2. Respondent City of Kingston is a municipal corporation organized to do business in the State of New York. It operates a municipal police department and is responsible for the conduct of its officers.
3. On June 21, 2021 at about 1:45 a.m., three armed police officers employed by the City of Kingston banged on the door to claimant's room at 25 Van Buren Street, Kingston, New York.
4. The police officers did not identify themselves as such.
5. Claimant opened the door and observed the officers with weapons drawn.
6. The officers commanded claimant to get to the ground with his hands by his sides.

7. Claimant complied with this direction as the officers entered his room without permission.
8. Claimant inquired as to what he had done as he knew he had engaged in no criminal activity and provided no probable cause of reasonable suspicion for the police intrusion.
9. The officers handcuffed claimant, who did not resist in any manner.
10. One unidentified officer placed his knee on claimant's back and maintained it there without cause or basis.
11. During this interaction, the officers caused a strain to claimant's lumbosacral and a rib fracture on his left side.
12. The city's agents falsely detained claimant without cause and caused him fear, apprehension and upset.
13. The city's agents applied and used excessive physical force against claimant causing him both physical injuries and ongoing pain and suffering.
14. The police officers moved claimant from his room to Perry's Towing on Broadway where he was detained for about 30 minutes until a commanding officer directed that he be uncuffed and released.
15. No reasonable suspicion or probable cause existed to so detain claimant.
16. By dint of the unlawful actions set forth above, the City and its agents have violated claimant's right to be free in his own premises, his right to be free of unlawful search and seizure, to be free of unlawful deprivation of his liberty; to be free of unlawful physical force by state actors and to be free of racial stereotyping.

17. Claimant hereby demands adjustment of his claims and, absent the same, shall pursue further legal remedies. Claimant appoints Michael H. Sussman, Esq., PO Box 1005, Goshen, NY 10924 [845]-294-3991 as his counsel in this matter

  
EDWARD JAMES LONDON, JR.

Signed and sworn to before me this 16<sup>th</sup> day of July 2021.



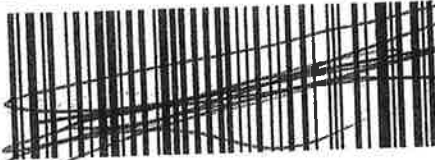
NOTARY PUBLIC

My commission expires: 05/08/2025

Allison Allan Morse  
NOTARY PUBLIC STATE OF NEW YORK  
Registration No. 01AL6358454  
Qualified in Dutchess County  
Commission Expires 05/2025

CERTIFIED MAIL

Sussman & Associates  
1 RAILROAD AVE - SUITE 3  
P.O. Box 1005  
GOSHEN, NEW YORK 10924



7020 2450 0001 0303 6164

City Clerk  
City of Kingston  
420 Broadway  
Kingston NY 12401

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