

STATE OF NEW YORK
SUPREME COURT: COUNTY OF ERIE

QUENTIN SUTTLES

**VERIFIED
NOTICE OF CLAIM**

Claimant/Petitioner/Plaintiff,

vs.

**CITY OF BUFFALO,
BUFFALO POLICE DEPARTMENT,
BYRON C. LOCKWOOD,
RONALD J. AMMERMAN, and
MICHAEL SCHEU**

Respondents.

**TO: Timothy Ball, Esq. Corporation Counsel
City of Buffalo Law Department
1100 City Hall
Buffalo, New York 14202**

**Buffalo Police Headquarters
68 Court Street
Buffalo, New York 14202**

PLEASE TAKE NOTICE, that Claimant QUENTIN SUTTLES, by and through his attorneys, Ramos & Ramos, as and for his Notice of Claim against the Respondents herein, THE CITY OF BUFFALO, BUFFALO POLICE DEPARTMENT, BYRON C. LOCKWOOD, RONALD J. AMMERMAN and MICHAEL SCHEU, states as follows:

1. The name and post office address of the Claimant is as follows:

#####

2. The name and post office address of the Claimants' attorney is as follows: Ramos & Ramos, Joshua I. Ramos, Esq., 37 Franklin Street, Suite 1000, Buffalo, New York 14202.

3. The nature of the claim is as follows: Upon information and belief, the Claimant, QUENTIN SUTTLES, was caused to sustain serious personal injuries on May 10, 2020, at or near East Eagle and Madison Street, the City of Buffalo, State of New York when Respondents

RONALD J. AMMERMAN, and MICHAEL SCHEU, used excessive force and brutally beat Mr. Suttles when they pulled him over and arrested him. These claims arise under 42 USC 1983 and include but are not limited to Conspiracy, Unreasonable & Excessive Force, False Arrest & Imprisonment, Delay and Denial of Medical Treatment and Failure to Protect While in Custody, First & Fourteenth Amendment Violations and Conspiracy with Racial Animus, Assault & Battery, Neglect, Negligent Supervision, Negligent Infliction of Emotional Distress, Liability under Respondeat Superior, Supervisory Liability. Upon information and belief, the negligence, carelessness and/or recklessness of the Respondents proximately caused and/or was a substantial factor in bringing about the incident and the resulting injuries and damages suffered by the Claimant, QUENTIN SUTTLES. Upon information and belief, the negligence, carelessness and/or recklessness of the Respondents, THE CITY OF BUFFALO, BUFFALO POLICE DEPARTMENT and BYRON C. LOCKWOOD, in his official capacity, also includes but is not limited to failure to institute proper and adequate practice, protocol and procedure relative to the effectuation of arrests and use of excessive force as well as the failure to properly and adequately supervise its police and specifically Respondents, RONALD J. AMMERMAN, and MICHAEL SCHEU, as well as failure to properly and adequately train its police and specifically Respondents, RONALD J. AMMERMAN, and MICHAEL SCHEU with respect to adequate proper police practice, protocol and procedure in the effectuation of arrests and excessive force practice, protocol and procedure. Further, upon information and belief, the Respondents, THE CITY OF BUFFALO, BUFFALO POLICE DEPARTMENT and BYRON C. LOCKWOOD, had actual and/or constructive notice of the propensities of Respondents, RONALD J. AMMERMAN, and MICHAEL SCHEU, in the unjustified use of excessive force and improper police practice.

4. The time when, the place where and the manner in which the claim arose are as follows: The incident took place at or about 6:20 p.m. May 10, 2020, at or near East Eagle and Madison Street, the City of Buffalo, State of New York. After the officers/Respondents, RONALD J. AMMERMAN, and MICHAEL SCHEU, followed the Claimant, QUENTIN SUTTLES' car around the City of Buffalo for minutes, when he eventually committed a minor traffic offense, they pulled Mr. Suttles over and initiated a traffic stop. They then asked Mr. Suttles to step out of the car and Mr. Suttles agreed to step out of his car without issue. As the officers/Respondents, RONALD J. AMMERMAN and MICHAEL SCHEU, searched Mr.

Suttles, they had engaged in prolonged grabbing of his genitals while finding no contraband. The officers/Respondents, RONALD J. AMMERMAN and MICHAEL SCHEU, then grabbed his hands and while throwing him to the ground advised that his hands need to be out of his pockets...while his hands were either against the car, or being held by the officers. Further, after the arrest, in an effort to cover their efforts, while Mr. Suttles was on the ground, and a witness asked why they would beat Mr. Suttles, the officers/Respondents, RONALD J. AMMERMAN and MICHAEL SCHEU alleged they were saving his life as he was trying to eat drugs. No drugs were found, and while Mr. Suttles was being searched, he had a COVID-19 mask covering his face the entire time. Despite inflicting serious physical injury upon Mr. Suttles, Respondents then waited until the following day to obtain medical treatment for Mr. Suttles, despite their duty to seek immediate medical attention under Federal Law, as well as under their own use of force policy. Officers/Respondents, RONALD J. AMMERMAN and MICHAEL SCHEU, then acting under color of state law, within the course and scope of employment, fabricated false legal documents; including but not limited to, certified under penalty of perjury Complaints against the Claimant that the Claimant allegedly, alleged that the Claimant did fight with the officers, while, per the officer body cam footage as well as the witness video footage, the Claimant never through one punch or made an aggressive move against the arresting officers. Officers/Respondents, RONALD J. AMMERMAN and MICHAEL SCHEU also complained that while Mr. Suttles was on the ground being struck by him, they falsely accused Mr. Suttles of throwing an item.

5. The motivations, as evinced by the following of Mr. Suttles for no reason for minutes, are racially driven. Mr. Suttles is African American while the assaulting officers Respondents, RONALD J. AMMERMAN and MICHAEL SCHEU, are Caucasian. Further, the Court systems have already determined, as a matter of Law, the City of Buffalo, and the Police Department has violated his Fourth Amendment Rights in the past causing him to spend unnecessary years in jail.

6. Upon information and belief, the police misconduct of the Respondents includes but is not limited to: excessive force, assault, racial profiling, false arrest, unjust imprisonment, abuse of authority, witness tampering, and police brutality, as well as cause serious physical injuries, including, Fractured Scapula, and Fractured Orbital Bone.

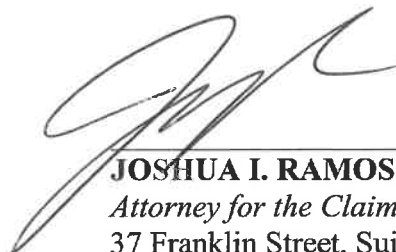
7. Upon information and belief, Respondents acted with gross negligence and reckless disregard.

8. The items of damage or injuries claimed to have been sustained are as follows: Upon information and belief, Claimant Quentin Suttles suffered serious, permanent physical injuries, including, but not limited to a Fractured Scapula, and Fractured Orbital Bone, Right Shoulder, Right Eye and Eye Socket. Upon information and belief, Claimant suffered severe conscious pain and suffering, including loss of enjoyment of life; permanent restriction and limitation of motion, function, and use; loss of strength and dexterity; Claimant's injury has resulted in mental anguish, anxiety, and stress; the impairment of his ability to perform his usual and customary activities of daily living. Upon information and belief, the Claimant's injuries are permanent, all relating to the incident and incident complained of, all to his detriment.

WHEREFORE, Claimants, Quentin Suttles, , demand the Respondents THE CITY OF BUFFALO, BUFFALO POLICE DEPARTMENT, BYRON C. LOCKWOOD, RONALD J. MMERMAN, and MICHAEL SCHEU, pay their claims, otherwise please be advised Claimants will commence a lawsuit seeking all damages to which they may be entitled to under the circumstances, as may be proven and determined upon trial, in an amount which would exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with such other and further relief as to the Court may seem just, proper, and equitable.

DATED: June 22, 2020
Buffalo, NY

RAMOS & RAMOS




JOSHUA I. RAMOS, ESQ.
Attorney for the Claimant
37 Franklin Street, Suite 1000
Buffalo, NY 14202
(716) 810-6140

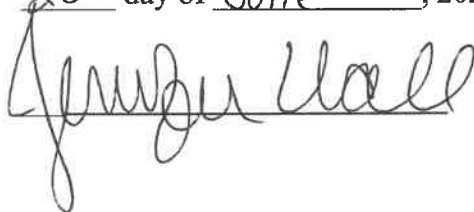
VERIFICATION

STATE OF NEW YORK)
COUNTY OF ERIE) ss:

JOSHUA I. RAMOS, being duly sworn, deposes and says that he is the attorney for the Claimant herein; that he has read the foregoing Notice of Claim and knows the contents thereof; that the same is true to the knowledge of the deponent, except as to the matters therein stated to be alleged on information and belief, and that as to those matters he believes them to be true.


JOSHUA I. RAMOS

Sworn to before me this
22nd day of June, 2020.



JENNIFER I. HALL
NOTARY PUBLIC-STATE OF NEW YORK
No. 01HA6342545
Qualified in Niagara County
My Commission Expires 05-23-2024