

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JEFFREY JEFFERS

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* AUG 03 2015 *
BROOKLYN OFFICE

Amended
Complaint

15-CV-02965

(JG) (LB)
FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* 8/3/2015 *
BROOKLYN OFFICE

v.

THE CITY OF NEW YORK,

Maximo A. Tolentino

Deputy Inspector of the

83rd Precinct, P.O. Glinsky #3977,
P.O. Voucass #20227 IN

their official and individual capacity

on and about March 3, 2015 at the
83rd precinct in Brooklyn, the plaintiff
was arrested and taken to the
83rd to be booked and processed, during
the stay at the 83rd precinct the plaintiff
was forced to use a prisoner restroom
that was infested with smeared human feces,
urine, bugs and the walls and floors were
littered with human feces and urine, the sink
toilet also was covered in waste and urine
cont

cont (2)

with bugs and a unbearable stench, this restroom has been in this filthy condition since June 2014 when I was arrested there in the same condition which is not cleaned; to injure prisoners who are taken to the precinct and who are in custody, the plaintiff was bitten by some kinda bug while having to stand and defecate while held at the 83rd precinct from March 3, 2015 to March 6, 2015 and only feed once a day for a total of Three (3) days before going to several hospitals and to Central Booking, these conditions were inhumane and to even shock the conscience, the plaintiffs arresting officers knew of the hazardous conditions of restroom but still placed the plaintiff in harms way and did nothing to remedy the conditions or complain of the conditions the prisoners who were in custody at the 83rd precinct nor the deputy inspector who is in command of precinct (cont)

(cont. 3)

while acting under color of state law purporting to do their civil duties knowingly did direct Jailers, porters or staff to disinfect and clean the prisoners restroom violates the (8th) eighth amendment of cruel and unusual punishment, this restroom adjoins the holding pens at the 83rd precinct, which most all prisoners are held and where I was placed is a holding cell with no bathroom toilet, or sink or running water, this restroom is located to the right of the room with the holdcell these areas are in one large room, and this happen to me on more than one occasion, june 2014 and in march 2015 and the same filthy conditions with feces urine and bugs littered this restroom, yes the plaintiff was forced to use this
(cont)

Cont (4)

restroom or urinate or defecate in the holding pen which only consist of a bench, floor and bars! so in order to use the bathroom you must be escorted to the bathroom unless you are placed in the back cells which are littered with trash urine, feces in the toilets and insects but I was made to stay in the holding pen in march 2015 and June 2014 I was placed in both the back cells in the precinct and the holding pen, but not in March 2015 I had to endure this inhumane act at the hands of the N.Y.P.D at the 83rd precinct for the CITY OF NEW YORK who I was in

Cont (5)

Care, custody and control of, this malicious act was done to cause harm and mental anguish to the prisoners which in fact caused the plaintiff mental anguish and distress on two occasions first in JUNE 2014 the same nasty filthy conditions in march 2015 in which I had to use this bathroom at least (5) five times to urinate and defecate under these inhumane conditions, and (3) Three times in JUNE 2014 when I was arrested also, I was forced to use this bathroom due to fact there is no bathroom in the holding pens at the 83rd precinct only in the cells and I was not put in the cells during my arrest, These conditions brought about distress, hardship and emotional anguish as well as a rash on my body.

first course of action

The plaintiff seeks and demands compensatory damage relief from the defendants, The CITY OF NEW YORK at the 83rd precinct for violating the plaintiff eighth amendment right, to be free from cruel and unusual punishment, by not providing a safe and secure condition (restraining) while in the custody of the N.Y.P.D. at the 83rd Precinct by being exposed to hazardous health conditions that were infested with human feces and urine as if human decency was not a factor, the plaintiff demands "fifty thousand dollars" \$50,000

Second course of action

The plaintiff seeks and demands monetary
damage relief from the defendants
P.O. Vucass, P.O. Glinosky for not
creating a safe environment for the
plaintiff while in their custody, a
health risk arised and the plaintiff's
liberty was taken away and put in
harm's way and exposed to unsafe
dangerous atmosphere of harm and to
shock the conscience by the conditions
that the plaintiff was made to endure
of cruel and unusual punishment the
plaintiff demands " fifty thousand dollars
\$ 50,000

Third cause of action

The plaintiff seeks and demands compensatory damage relief from the defendant MAXIMO A. Tolentino for his act of cruel and unusual punishment against the plaintiff for his part in supervisory liability for being the chief and commanding officer at the 83rd precinct and not having staff to clean and maintain the prisoners restroom, cells and holding pens but turned a blind eye and purporting to act under color of state law to cause the plaintiff harm

cont

Third cause cont
of actual

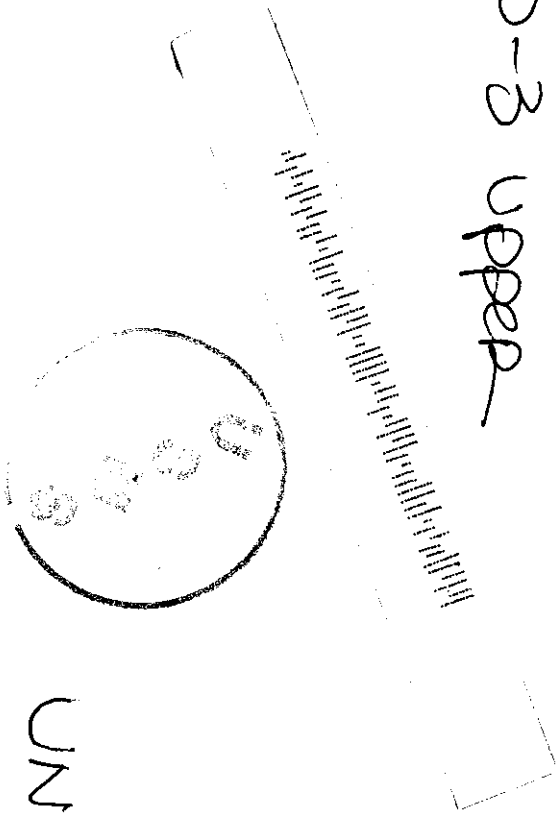
duress, hardship subduress, emotional
distress and to suffer cruel
and unusual surrounding white being
detained at the 83rd precinct for
several days and not properly feed
but to be treated as a animal
and denied the standard bare
necessesities of life! The plaintiff
seeks relief in the amount of
" fifty thousand dollars. and in
total of Hundred and fifty thousand
dollars and all other relief that
the courts finds, just equitable
and proper.

MR. JEFFREY JEFFERS Rtc # 895-15-00408
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N.D.C. 11378

100-3 Upper



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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Brooklyn, New York 11201

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