

CIVIL RIGHTS COMPLAINT
42 U.S.C. 1983

ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ JUL 20 2015 ★
LONG ISLAND OFFICE

Layton Scott Turner/8951500351

Plaintiff,

JURY DEMAND

YES NO

-against-

Detective Dellemo 84th Pct.
Eric Megget Legal AID
Grover Fransis Legal Aid Assistant.
Judge Ann.M.Donnelly

CV 15 4392

TOWNES, J.

BLOOM, M.J.

I. Previous lawsuits:

- A. Have you begun other lawsuits in State or Federal Court dealing with the same facts involved in this Action or otherwise relating to your imprisonment? Yes() No(/)
- B. If your answer to A is yes, describe each lawsuit in the space below (If there is more than one lawsuit, describe the Additional lawsuits on another piece of paper, using the Same Outline.)

1. Parties to this previous lawsuit:

Plaintiffs:

Defendants:

- 2. Court (if Federal Court, name the District; if State Court, Name the County)

3. Docket Number: 01126/2013

4. Name of the Judge to whom case was Assigned:
Judge Ann.M.Donnely, Brooklyn Supreme

5. Disposition:(foe exaple:Was the Case disssmised?

Was the Case Appealed? Is it Pending?Currently
Still Pending.

6. Approximate date of filing lawsuit: 2009

7. Approximate date of Disposition: 2009

II. Place of Confinement: O.B.C.C. 1600Hazen Street East ElmHurst,
Queens,New York,11370

A. Is there a prisoner Grievance procedure in this institution?
Yes() No()

B,.Did you Present the facts relating to your complaint in
prisoner Grievance procedure? YES(/) NO ()

C. If your answer is YES,

1.What steps did you take? I have filed a Complaint
with Grievance Committee 2nd&11th Judicial Disrict
Renaissance Plaza,and Departmental Disciplinary
Committee First Judicial Department ,Both addresses are
335 Adams street ,Suite 2400 Brooklyn,Ny.11201-3745
And 61 Broadway 2nd floor New York ,N.y. 10006,Also
Special Litigation Section ,Civil Rights Division
U.S. Department of Justice P.O.Box 66400.Washington
D.C. 20035-6400

2. What results did you Get? No response

D. If your answer is NO,explain why not

E. If there is no prison Græevance procedure in the institution,
did you complain to prison authorities? Yes (/) No()

F. I f your answer is YES,

1. What steps did you take? I made a complaint with

a Captain ,.

2. What was the Result? Also No response, they Jst flipped and popped they collar like the fonze.

III. Parties:

(In o item A below, Place your name in the first blank and Place your present address in the second Blank. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff Layton Scott "Justice" Turner

Address : 1600 Hazen Street East ElmHurst, Queens, New York 11370

(In item B below, place the full name and address of each Defendant)

B. List all Defendants names and addresses at which each defendant may be served. Plaintiff must provide the addresses for each Defendant named.

Defendant No.1 Judge Ann.M.Donnely 320 Jay Street 11201, Supreme Court Building

Defendant No.2 A Detective Dellemo, 301 Gold Street Brooklyn, Ny 11206 the 84th precinct.

Defendant No.3 A Grover Fransis 199 Water Street New York, N.Y. 11238

Defendant No.4 A Eric Megget 11 Livingston Street 11201 Brooklyn, N.Y.

IV. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the dates(s) of the events alleged as well as the location where the events occurred. Include the Names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related

Claims, number and set forth each Claim in a Separate paragraph. You may use additional 8 1/2 by 11 Sheets of paper as Necessary.)

"Mutual Agreements" My Amendment Right were violated when Malicious Prosecution Began, in a Brooklyn Precinct, Down Town accross the Street from the all new Barclay Center Arena, where Two Detectives forced a Complaining Witness to choose me in a Line-up on Feb, 1st, 2013, Just a few day's before I was to return to California to go Back to School. I was then Transfered to the 84th Precinct where I was held for inter-agation By Detective Dellemo. He was notified of this occurance but acted as if I was tellin g a lie to him, he continued interogations, instead of acting as a good Officer and Comencing a short Due Process in Diligence this would have prevented the Claim of Malicious Prosecution, Later going on to testify at the Grand Jury. Detective Dellemo was Convicted of purjury in a Brooklyn Supreme Court room in the past, on a Identical case such as the one I am in right now. Knowingly allowing the prosecution to proceed with the Fruit of the Piosonous tree tainting the case at hand Detective Dellemo Congested Brooklyn Supremem Court with more lies , through preliminary and then Arraignment hearings. Grover Fransis and a Eric Megget (Whom were dis-bared in the past from any Court thereby deemed Just and Proper of the New York City limitation Guidlines) were notified of the occurances, and in dissbelief of my Claim never took notice, vying to allow time to equalize the amount of Justice the said Crime Should should hold me accountable for, without a short Diligent Due Process of Claim of Information. A Eric Megget and a Grover Fransis were also Convited of Briebery against this Defendant in the past, witch were Supporting factors and Grounds of Dismissal, and the resignation of the case where's a Judge Ann.M. Donnelly was aware of these Inf-

ormation and were improperly adjudged,deeming a Eric Megget and aGrover Fransis adiquite legal Counsel allowing them to post multiple 7:30 hearings to find me unfit(this allowing the Challenging of my licencing due to forfeiting sound mind),also disallowing me to confirm my Standings under Oath as a Handler of the Matters.

IV.A If you are Claiming Injuries as a result of the events you are complaing about,describe your Injuries and State what Medical Treatment you required.WAS Medical treatment recieved?

I have a report made by bellvue,this diagnosis is a Positive Id of my Claim,of a Spinal Chord Injurie said to have been had before my arrest date ,but thats not all I complained about I told Grover Fransis and aEric Megget of a Severely Bruised heal,and a Head injurie,a thigh that is like a hair-line fracture,elbow and wriest injuries also,that were never looked after. Threghut the Duration of almost three years (State Time) 30 Months; I was Assaulted 4 times,and wound up suffering a Blow to my temple(Blind Sided) from behind witch may have derailed my process of healing or made it worst.This Knuckle bald fist to my temple was never treated with as little as Ice nore was I sent for an X-Ray at Orange Regional Hospital.Till this day I still have a tender spot on my head that can't be touched till this day 7/14/15.By the way at sick call at C-95 nore,Mid Hudson and now O.B.C.C. twice can I get Medical Treatment for my Complaints.By Proticol Judge Ann.M.Donnelly Canand Should have emeadatly made a refusal for me to go to Kings County and get checked out.The Preliminary Judge should also be supeonad but I dont Know the name,I also let that Judge be aware of my circumstances as well as the arraignment Judge.

V. Relief:

State what relief you are asking and,or seeking if you prevail on your

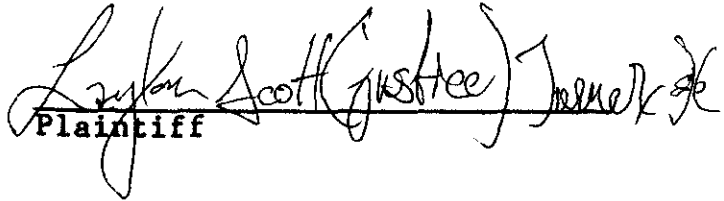
Complaint.

For my Pain and suffering throughout this Malisious Prosecution ,Should be compansated with of Course the proper Medical Treatment of ailments and a Summary Judgement of up to 9 Million Dollars. Treatment for my Head Injuries,my back injuries,my Hip and Thigh bone injuries,my foot injäries and my Elbow and wriest injuries.Compansation of my tuition moneys,for witch I paid ahead of time,thinking I would be able to get back in time to aFeb,20th,2013 Scedual at the prestigious UCLA Colledge in California. Being assulted under these painfull conditions,neglected and further denied treatment was ultimatly degrading,I never fit the description,nore was I picked out of a photo aray line-up,witch un-Justified probable cause,further falsly accussed andcoerrsed was the Complaining witness aganst me in a full fill-in line-up at aDowntown Precinct adjacent to the Barclay Center Arena ,the Complaining witness broke her silence and Stated to the other Gentelmen and myself that Iam being forced to pick you out of a line-up in room with the two-way Glass,the gentlemen and myself overheard every thing. I demand full Satisfaction of the matter,and retooling of my memmories of the mtters Matters,as I jogg them to stay coherant,cause of the term of three Stäee bid Years,(30) Months of the food filled every thing from Croes examination mads to sleeping medication and softpeter,plus Nurontinand Ibueuprohpin I struggle to stay abreast of findings and Judgement of matters that take place. And to see that Justice Perform its process, in my good faith of DisciplinÄRY Messures of these Characters in your Court Room.

I declaire under the penalty of perjury that on July,14th,2015, I deliverdd this complaint to prison authorities to be mailed to the United States District Court for the Eastern District of New York.

Signed this 14th day of July,2015.I declare under penalty of perjury

that the foregoing is true and correct.


Plaintiff

Otis Bantom Correction Facility
1600 Hazen Street East Elmhurst
Queens, New York, 11370
8051500351 Prisoners I.D.#

Sworn to Before me this
_____ day of July, 2015

NOTARY PUBLIC/COMMISSIONER OF DEEDS 2015