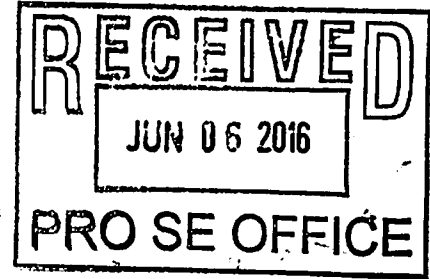


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

NORMAN E. Thompson



CIVIL RIGHTS COMPLAINT

42 U.S.C. § 1983

CV 16- 2665

Plaintiff,

[Insert full name of plaintiff/prisoner]

JURY DEMAND COGAN, J.

YES  NO

-against-

Londa Hicks, Barry Davis,  
Oscar Polanco, Dennise Grammon, NYPD  
Asako Ishii, Rodney Smith, NYS Dept of Correction & Supervision  
Gregory Basso, NYC District Attorney's office  
The State of New York and New York City office of the  
The City of New York, Chief Medical Examiner  
of the Brooklyn District Attorney's office

Defendant(s).

[Insert full name(s) of defendant(s). If you need additional space, please write "see attached" and insert a separate page with the full names of the additional defendants. The names listed above must be identical to those listed in Part I]

I. Parties: (In item A below, place your name in the first blank and provide your present address and telephone number. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff NORMAN E. Thompson

If you are incarcerated, provide the name of the facility and address:

Clinton Correctional Facility (Annex)

1074 Rt. 374, P.O. Box 2002

DANNEMORA, NY 12929

Prisoner ID Number: 15A2785

If you are not incarcerated, provide your current address:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Telephone Number: \_\_\_\_\_

**B. List all defendants.** You must provide the full names of each defendant and the addresses at which each defendant may be served. The defendants listed here must match the defendants named in the caption on page 1.

Defendant No. 1 Ronda Hicks, Shield # 1681  
 Full Name  
Police Officer  
 Job Title  
New York State Department of  
Correction, Brooklyn Five  
 Address  
 718-780-9222 15 Second Ave  
 BKLYN, NY 11215

Defendant No. 2 Barry Davis, Shield # 630  
 Full Name  
Police Officer  
 Job Title  
New York State Department of  
Collection, Brooklyn Five  
 Address 15 Second Ave, BKlyn, NY 11215

Defendant No. 3 Oscar Robles, shield # 672  
 Full Name  
Police Officer  
 Job Title  
Patrol Borough Brooklyn North  
179 Wilson Ave, BKlyn NY  
11237

Address

Defendant No. 4

Asako Ishii

Full Name

Criminalist

Job Title

NYC Office of Chief Medical

Examiner, 421 E. 26th Street, NYC 10016

Address

Defendant No. 5

Gregory BASSO

Full Name

Assistant District Attorney

Job Title

350 Jay Street, BKlyn

NY, 11201

Address

(See Attached for other defendants)

II. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) 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.)

Where did the events giving rise to your claim(s) occur?

393 Jefferson Ave, BKlyn, NY 11221, 1st floor Apartment

When did the events happen? (include approximate time and date)

November 12, 2013 at approximately 8pm



Dennise Glennum \_\_\_\_\_ Full Name

Role Supervisor \_\_\_\_\_ Job Title

New York State Department of  
Corrections, Brooklyn Five \_\_\_\_\_ Address

15 Second Ave, BKlyn NY 11215

Rodney Smith \_\_\_\_\_ Full Name

Role Supervisor \_\_\_\_\_ Job Title

New York State Department of  
Corrections, Brooklyn Five \_\_\_\_\_ Address

15 Second Ave, BKlyn NY 11215

New York City Police Department \_\_\_\_\_ Full Name

CPD Commissioner William Bratton \_\_\_\_\_ Job Title

One Police Plaza \_\_\_\_\_ Address

NYC, 10038

The City of New York \_\_\_\_\_ Full Name

CPD Comptroller Scott Stringer \_\_\_\_\_ Job Title

One Centre Street, New York \_\_\_\_\_ Address

City 10007

amish 11/17

amish 11/17

amish 11/17

amish 11/17

amish 11/17

amish 11/17

amish 11/17

amish 11/17

amish 11/17

amish 11/17

amish 11/17

amish 11/17

New York State Office of the Attorney General Full Name  
C/O Attorney General Schneiderman Job Title  
The Capitol Address  
Albany, New York 12224

New York City Office of the Chief Medical Examiner Full Name  
C/O Commissioner Sampson, MD FHP Job Title  
421 E. 26th Street, NYC 10016 Address

The Brooklyn District Attorney's Office Full Name  
C/O Ken Thompson Job Title  
350 Jay Street, Bklyn Address  
NY 11201

New York State Department of Correction and Supervision Full Name  
- C/O Commissioner Annunzio Job Title  
W. Greuell Harriman State Address  
Office Building Campus  
1220 Washington Ave  
Albany NY, 12203





III. Relief: State what relief you are seeking if you prevail on your complaint.

*please see attached Complaint*

I declare under penalty of perjury that on \_\_\_\_\_, I delivered this  
(date)  
complaint to prison authorities at \_\_\_\_\_ to be mailed to the United  
(name of prison)  
States District Court for the Eastern District of New York. *N/A.*

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 5/6/16

*[Handwritten Signature]*  
Signature of Plaintiff

CLINTON CORRECTIONAL FACILITY  
Name of Prison Facility or Address if not incarcerated

P.O. Box 2002, 1074 RT. 374

DANNEMORA, NEW YORK [12929]

Address

15A 27 85  
Prisoner ID#

*Submitted June 6, 2016 at.*

## Norman Thompson Complaint Continued

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
NORMAN THOMPSON,

Plaintiff

V.

RONDA HICKS, BARRY DAVIS, DENNISE GRANNUM, RODNEY SMITH,  
OSCAR POLANCO, ASAKO ISHII, GREGORY BASSO,  
NEW YORK CITY POLICE DEPARTMENT,  
NEW YORK STATE DEPARTMENT OF CORRECTION AND SUPERVISION,  
THE STATE OF NEW YORK, NEW YORK STATE OFFICE OF THE ATTORNEY  
GENERAL, THE BROOKLYN DISTRICT ATTORNEY'S OFFICE, THE CITY OF  
NEW YORK AND NEW YORK CITY OFFICE OF THE CHIEF MEDICAL  
EXAMINER

Defendant (s).

-----X

**Facts: Nature of Claim:** False Imprisonment, Violation of Rights protected under the Constitution, Abuse of process, Municipal liability, Excessive detention, Negligent infliction of emotional distress, Intentional infliction of emotional distress, Negligent retention, Harassment, Gross negligence, Violation of civil rights under the Constitution of the State of New York and United States of America.

**The time when, the place where and the manner in which the claim arose:** Norman Thompson, indictment No. 09802-2013 was sentenced on June 17, 2015. From the time of his arrest and throughout the trial many civil rights violations occurred. Norman Thompson was on parole in November 2013 at home sleeping (11-12-13). Nearly a dozen Parole officers came to search his home. The following civil rights violations occurred:

- A gun was retrieved from the wall in his room. Norman Thompson denies having any knowledge about this firearm. Parole says it was wrapped inside

plastic and a towel. The original arrest charge by NYPD officer Oscar Polanco, Shield # 672 was CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, CLASS D. However, Assistant District Attorney Gregory Basso unlawfully upgraded the charges. Norman Thompson was indicted on: CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, CRIMINAL POSSESSION OF A FIREARM, CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE. Mr. Basso got a conviction on **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**. Norman Thompson wasn't charged with this upon arrest. There wasn't any evidence to support this charge that Mr. Basso won the case on. During the sentencing, The Court and Mr. Basso said that charges weren't upgraded against Norman Thompson. They unlawfully went ahead with sentencing.

- Acting under the direct supervision of NYS Parole Supervisor, Denise Grannum and Rodney Smith; NYS Parole officer Ronda Hicks, Shield # 1681 testified that she retrieved a gun in a wall that was wrapped in plastic and a towel. Officer Hicks testified that she handled the gun in the towel not the plastic (Trial Minutes line 3-4). Later, Officer Hicks testified that she doesn't know where the towel or the plastic is. (Trial Minutes line 2-3) NYS Parole Officer Barry Davis, Shield # 630 was also present with officer Hicks during the search. Officer Davis testified that he too doesn't know what happened to the towel or plastic (Trial Minutes line 22). NYS Parole can't account for key pieces of evidence that could have possibly been used to exonerate Norman Thompson. Brooklyn Assistant District Attorney Basso and the Court choose to over look that NYS Parole suppressed the evidence (the towel and the plastic). NYS Parole was never able to physically produce the plastic or the towel that the gun was wrapped in at trial. Still the Court and ADA went ahead with a conviction when parole didn't present all of the evidence.
- NYPD officer Oscar Polanco, Shield # 672 testified that he retrieved the gun with bare hands and didn't wear gloves. Officer Dennis Kosta, Shield # 5788 from the Evidence Collection Unit testified that no fingerprints were found on the gun. (Trial Minutes line 15 and line 7). Why aren't officer Polanco's prints on the gun? How could the gun not have any fingerprints at all when Polanco admitted to holding it with bare hands? NYPD tampered with the evidence!
- Criminalist Asako Ishii from the Office of Chief Medical Examiner testified on cross examination that DNA from Norman Thompson was found on the front strap, back strap and side grips as **Swab One**. However, officer Dennis Kosta,

testified that he prepared the swabs for the Evidence Collection Kit and sent them to the OCME. Officer Kosta testified to **Swab One** as the trigger and trigger guard not the front strap, back strap and side grips (which is where DNA was found from another donor). Ms. Ishii lied and gave false testimony for swab 1. She knew that Norman Thompson's DNA wasn't on the front strap, back strap and side grips. (Trial Minutes, line 1 and 21). **Swab Two** is the front strap, back strap and side grips (Trial Minutes, line 22 and 7 and Police Report, Evidence Collection Kit and OCME DNA report). **Swab Three** is the slide grip grooves, slide release & safety. The OCME's DNA report evidenced suitable DNA comparisons on Swab Two and Swab Three. Norman Thompson's DNA wasn't on either swab. ADA Basso and Ms. Ishii willfully and knowingly gave false testimony to get a conviction. The OCME report indicates that DNA from a previous case that Norman Thompson was convicted on was also found to be on the slide grip grooves, slide release & safety. However, Norman Thompson's DNA was never found to be on Swab Two or Swab Three in this case or the previous case (GS00-0464). If Norman Thompson's DNA was not found on either Swab Two or Swab Three which is where the Donor DNA evidence was, then Ms. Ishii and the OCME deliberately lied. Ms. Ishii led the court to believe that Norman Thompson's DNA was on the front strap, back strap and side grips **relabeling** it as Swab 1. When in fact Swab 2 was the front strap, back strap and side grips. This makes her actions/findings illegal and her testimony a lie. Ms. Ishii's actions are criminal.

- Ms. Ishii testified that it's highly unlikely for just touched transfer DNA (Hearing Minutes 5/21/15, page 309, line 18-19). It's grossly negligent for Asako Ishii to make such statements at trial when she never had in her custody or conducted DNA analysis on the transfer items; the towel and plastic, which were handled by NYS Parole at the scene. Also, in her testimony, Ms. Ishii states that there are at least 4 additional donor samples of DNA in which she didn't conduct any comparisons. Officers held/touched Norman Thompson then handled the firearm. It was further reported that officer(s) touched the gun with bare hands at the scene. The police report details officer Polanco refusing a buccal swab. Officers Kosta, Hicks and Davis also declined to be swabbed. With additional donor samples on the firearm, Ms. Ishii and the OCME still chose not to conduct any comparisons. DNA doesn't put the gun in Norman Thompson's hands. It simply supports that fact of transfer DNA from Norman Thompson to parole/police which was transferred to the firearm.
- During the trial, the arresting officer, Polanco testified that the gun was found at the home unloaded by Parole. Then suddenly Assistant District Attorney Basso and the Court began to lead officer Polanco, asking him to talk into the

microphone and then pull in his chair. Again, officer Polanco said the gun was found unloaded at the home. Then the Court requested side bar and went off the record. When they reconvened, NYPD officer Polanco suddenly changed his testimony saying the firearm was loaded. (5/20/15 Hearing Minutes p. 239, line 11-24.) The Court and ADA Basso were able to get the arresting officer to change his testimony at side bar.

- Norman Thompson has been railroaded through this system. Charges and testimony were simply not true and used to convict him on 6/17/15 for thirteen years. Parole, police, OCME, ADA all tampered with and suppressed the evidence just for conviction. Police was persuaded by the Court and ADA to change their testimony. I formally bring this claim against the entities mentioned.

**Relief: The items of damage or injuries claimed are:** pain, suffering, loss of earnings, loss of enjoyment of life, loss of freedom, emotional distress, mental anguish, other mental health problems, shame, humiliation, indignity, damage to reputation, and incurred monetary costs and other damages.

- ✓ Immediate Release of NORMAN THOMPSON
  - ✓ Ronda Hicks, Parole Officer – \$1,000,000.00 (One Million Dollars)
  - ✓ Barry Davis, Parole Officer – \$1,000,000.00 (One Million Dollars)
  - ✓ Denise Granum, Parole Supervisor – \$1,000,000.00 (One Million Dollars)
  - ✓ Rodney Smith, Parole Supervisor – \$1,000,000.00 (One Million Dollars)
  - ✓ Oscar Polanco, Police Officer – \$5,000,000.00 (Five Million Dollars)
  - ✓ Asako Ishii, Criminalist – \$7,000,000.00 (Seven Million Dollars)
  - ✓ Gregory Basso, Assit. District Attorney – \$7,000,000.00 (Seven Million Dollars)
  - ✓ THE CITY OF NEW YORK: \$10,000,000.00 (Ten Million Dollars)
  - ✓ THE STATE OF NEW YORK: \$10,000,000.00 (Ten Million Dollars)
  - ✓ NEW YORK STATE DEPARTMENT OF CORRECTION & SUPERVISION - \$5,000,000.00 (Five Million Dollars)
  - ✓ NEW YORK CITY OFFICE OF THE CHIEF MEDICAL EXAMINER - \$10,000,000.00 (Ten Million Dollars)
  - ✓ NEW YORK STATE OFFCIE OF THE ATTORNEY GENERAL – \$7,000,000.00 (Seven Million Dollars)
  - ✓ BROOKLYN DISTRICT ATTORNEY’S OFFICE - \$5,000,000.00 (Five Million Dollars)
- TOTAL: \$70,000,000.00 (Seventy Million Dollars)
- Claimant also seeks permanent injunctive, punitive relief against the respondents related to their conduct.