

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RECEIVED
SDNY PRO SE OFFICE

2015 AUG 24 P 3: 29

Kalonji Mahon

(In the space above enter the full name(s) of the plaintiff(s).)

AMENDED
COMPLAINT

under the Civil Rights Act,
42 U.S.C. § 1983

-against-

- Defendant # • BURIM NAMANI, Assistant District Attorney
IN BRONX County, New York State
- Defendant # • Under cover officer no. 233 (Narcotics Bureau/Bronx)
- Defendant # • Detective Anthony Schaffer, (N. B. B. X.)
Narcotics Bureau, Bronx - Shield No. 6513
- Defendant # • Sgt. John Urena, Sergeant of Narcotics Bureau
IN BRONX (New York) Shield No. 3550
- Defendant # • CITY OF NEW YORK

Jury Trial: Yes No
(check one)

15 Civ. 2032 (CM)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff's Name Kalonji Mahon
 ID# 12 A 5130
 Current Institution GREEN Correctional Facility
 Address P.O. Box 975
Coxsackie, New York 12051

- B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name BURIM NAMANI (Assistant District Attorney)
 Where Currently Employed Office of District Attorney, Bronx County
 Address 198 East 161st street
BRONX, New York 10451

Defendant No. 2 Name Detective Anthony Schaffer Shield # 6513
Where Currently Employed New York City Police Department
Address One Police Plaza, Room 1100
New York, New York 10038

Defendant No. 3 Name Sgt. John Urena (Retired) Shield # 3550
Where Currently Employed New York Police Department - Legal Bureau
Address One Police Plaza, Room 1406
New York, New York 10038

Who did what?

Defendant No. 4 Name City of New York Shield # _____
Where Currently Employed municipal liability
Address Corporation Counsel, City of New York - Law Department
100 Church Street, New York, N.Y. 10007

Defendant No. 5 Name Undercover Officer NO. 233 Shield # _____
Where Currently Employed Narcotics Bureau / Bronx (N.B.B.X.); N.Y.C.P.D.
Address One Police Plaza, Room 1100
New York, New York 10038

II. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. ~~In what institution did the events giving rise to your claim(s) occur?~~

N/A

B. Where in the institution did the events giving rise to your claim(s) occur? Outside, in front of a building on Burke and Holland Avenue in Bronx, New York 10467

C. What date and approximate time did the events giving rise to your claim(s) occur?

On March 22, 2011 at around 11:00 o'clock p.m.

D. Facts: On March 22, 2011, Plaintiff was arrested by Defendants Det. Anthony Schaffer and Sgt. John Urena for criminal possession in the third degree, and criminal poss. in the seventh degree, along with the charge of resisting arrest under Docket # 2011 BX 016567

What happened to you?



However, prior to being falsely arrested, plaintiff was already on bail for other previous/pending cases - which plaintiff was subsequently and consequentially remanded on - and plaintiff had to repay these bails over along with a 5,000⁰⁰ bail raise (from a case that plaintiff was released on his own recognizances on from since 2009 under Ind. # 4858/09) (Contemporaneously, plaintiff was acquitted of Ind. # 4858/09 (by trial) on March 5, 2012, also) Plus, plaintiff had to post a new bail at \$1500⁰⁰ for case under Docket # 2011 BX 016567 (for which he was falsely arrested) and held until or around June 2011 - when the bail was posted.

The charges were terminated in March 5, 2012, along with the charges under Ind. # 4858/09 which plaintiff's bail was remanded on (and raised to \$5000⁰⁰) in March, 22, 2011, pursuant to the false charges for drug possession that accrued, which said charges were sealed in favor of the accused in April 3, 2012, because, according to court-appointed defense counsel (Mr Patrick L Bruno); the alleged drugs found were allegedly not real.

Matter of factly, upon information and belief, there were never any drugs or contraband found - they were only alleged to be found without any field tests done by Defendant Detective Schaffer (the arresting officer whom swore out the complaint) along with Sgt. John Urena - which the prosecutor Defendant Burim Namani conspired in/and with, to cover-up and not reveal - for over a year -- after continuously attempting to have plaintiff plead guilty to said false charges for over a year until March 6, 2012.

As and for a first cause of action against Defendant (Municipality) the City of New York whom is responsible / + liable in its direct and indirect municipal liability for failure to adequately train or supervise its employees in the New York City Police Department; and for creating or fostering such an environment where said crimes of fraud and deceit can be alleged and sworn against citizens by its police force; and for allowing unwritten policies or customs where such acts are tolerated without review and committed with impunity by N.Y. City Police Dept. members. (See, Monell v. Department of Social Services of City of New York (US NY 1978), 436 US 658, 98 S.Ct. 2018, 56 L.Ed.2d 611; Monroe v. Pape, 365 US 167, 81 S.Ct. 473, 5 L.Ed.2d 492 (1961))

Wherefore, and in addition, Plaintiffs 4th and 14th Constitutional Amendments due process rights were violated by Bronx County Assistant District Attorney - Defendant Burim Namani - for acting in conspiracy and collusion, or in concert, with Defendant members of the (municipal) police Department - and in taking over a year to dismiss charges while concealing fact that no drugs were ever found by Defendants Anthony Schaffer, N.C. No. 233, and Sgt. ^{John} Urena, whom filed a sworn false complaint against plaintiff. See, malicious prosecution; wrongful confinement, and unreasonable (bail) seizures (see, Albright v. Oliver, 510 US 266 (1994), 114 S.Ct. 807, at 815; cf., Burg v. Gosselin, 591 F.2d 95, 96 (2nd Cir. 2010)) also, ABUSE OF PROCESS, eg, Dumutef v. Morris, 956 F.Supp. 1112, 1118 (S.D.N.Y. 1997); Torres v. Supt. of Police, 893 F.2d 404, 411

As and for a second cause of action:
Defendant Burim Namani, in his individual and official capacity,

maliciously, falsely, deceitfully and fraudulently seized plaintiff and, deceitfully, in an act of fraud openly held charges against plaintiff - nefariously and falsely (misleading) claiming that the people (of the state of New York) were ready to proceed to trial against plaintiff (on Docket # 2011 BX 016567) - if Plaintiff did not plead guilty (to false, unsupported charges) -- throughout all intermittent court appearances, dates and adjournments from March 22, 2011 - until plaintiff posted bail in June 2011 - until April 3, 2012 when the charges were sealed / terminated in favor of the accused (See, Heck v. Humphrey, 512 US 477, 487 (1994)) See, Exhibit A (attached to original complaint) - pgs 8 + 9 of Plaintiff's rap sheet in cycle 19 - Docket # 2011 BX 016567.

2nd Claim

At all times material to this complaint, Defendant(s) Det. Schaffner, U.C. No. 233, and Sgt. Urena (as well as defendant Assistant District Attorney BURIM NAMANI of Bronx County, N.Y.) acted under color of statutes, customs, ordinances and usages of the State of New York, City of New York / Bronx County, and the New York City Police Department.

Plaintiff, Kalonji Mahon, approached a familiar, pretty-looking, female walking on and by intersecting corner of Burke Avenue and Holland Avenue; and plaintiff tried to 'pick her up'.

The pretty looking familiar female whom plaintiff accosted, however, was an undercover officer that in turn asked plaintiff for drugs (crack cocaine). She was/is Defendant Undercover Officer No. 233.

Plaintiff then asked undercover female officer (U.C. 202) ^{Defendant} "why?, and if she was a cop?" the undercover female officer, U.C. 202, replied: "No, that she was not a cop."

Suddenly then an unmarked van abruptly pulled over with several white/caucasian men all wearing black mostly, and jumped out of van, pouncing on plaintiff, and punching plaintiff in the face to drop plaintiff to the floor.

these unknown caucasian white skinned men were all undercover officer members of the N.Y. C.P.D., Narcotics Bureau in Bronx task force that Defendant Sgt. Urena was supervising during their so called short term 'buy and bust' operations.

Defendant U.C. #233 removed herself from the scene, and was never seen again.

Defendant Det. Anthony Schaffer, shield no. 6513, then, acting in concert with the other unknown members of Narcotics Bureau in Bronx, N.Y., subsequently arrested and handcuffed plaintiff under the direct supervision of his superior officer Defendant Sgt. Urena (shield no. 3550).

Defendant Schaffer (shield no. 6513) alleged/claimed to have allegedly found bags of crack/cocaine (allegedly) on the floor.

Defendant Sgt. John Urena (shield no. 3550) is a sergeant of this so called 'buy and bust' undercover narcotics bureau team/squad in Bronx, N.Y. (N.B.BX); and is responsible in his supervisor capacity/liability for overseeing sworn complaints

ISSUED by subordinate members of the N.B.B.X. Task Force; and for allowing his subordinate undercover detectives Defendant Anthony Schaffer (Shield no 6513) and other unknown members of the N.B.B.X. task force/squad to claim +/or plant a fake bag of drugs, and for acting in conspiracy with one another to allege that bag of crack/cocaine allegedly found appeared to be crack cocaine without a positive field test done by arresting officer Defendant Schaffer (whom swore out the complaint against Plaintiff) with Defendant Wic.# 233 acting in collusion/conspiracy to defraud official court documents.

- because obviously based upon information and belief - there never was any drugs found nor tested positive by Defendants whom acted in concert and collusion with another and swore out false allegations/information in the criminal complaint filed against Plaintiff.

Upon information and belief, a court-appointed lawyer, Mr. Patrick L. BRUNO, informed Plaintiff, on March 6, 2012, that charges under Docket # 16567C-2011 were being dismissed allegedly because drugs were not real - which was an abuse of the legal process due + violated Plaintiff's guaranteed/basic constitutional rights to adequate + equal due process/protection of the law, ^{see} TORRES v. Supt. of Police, 893 F.2d 404, 410 (1st Cir. 1990).

As and for a Third Cause of Action:

And Plaintiff was falsely accused, charged, arrested and seized by Defendants acting under color of state Law; and Plaintiff was deprived of life, liberty and limb without adequate due process of law in violation of his 4th and 14th U.S. Const. Amend(s).

And Plaintiff was wrongfully confined in Rikers island for about 3 months until his family/mother posted New bail(s) which plaintiff has not received back yet. Plus false charges and extraneous bail(s) were consequently held against Plaintiff maliciously to affect or coerce plea bargains for over a year.
 creating undue duress/stress from abuse. (-7-)

Lined area for text entry, currently blank.

Was anyone else involved?

Who else saw what happened?

III. Injuries: malicious prosecution/abuse of process (see Heck v. Humphrey, 512 US 477 at 486 n.5, 114 S.Ct. 2372 n.5)

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. wrongful confinement; unreasonable seizures & bails

Plaintiff spent 3 months in jail until his family posted bail(s) of \$1,500.00. Plaintiff was remanded on other bails that he was released on (prior to incident). Therefore plaintiff lost 10% of newly posted bail money of \$1,500.00; and 10% of money on \$7,500.00, and 10% of bail money on \$3,500.00 for other pending cases. AND Plaintiff was also subsequently/consequently remanded and given another bail of \$5000.00 - from another previously pending case, that Plaintiff was released on his own recognizance on, from since 2009. Wherefore plaintiff's opportunities/options of entering into plea bargains - or go to trial and testify on his own behalf was nefariously compromised by the false, extraneous decret full attached drug offense(s) attached to Plaintiff's name - causing duress and slander thru deceit.

IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?
Yes ___ No

V.

BASIS FOR JURISDICTION

Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case.

A. What is the basis for federal court jurisdiction?

☒ Federal Question

B. What federal Constitutional, statutory or treaty right is at issue?

Under 28 USC § 1331, plaintiff's civil rights violated by police officers and other law enforcement personnel acting under color of the law (State of New York, U.S.A.): malicious prosecution; false arrest; wrongful confinement, such as deprivations of life, liberty and limb without fair and equal due process (protections) of the law.

And plaintiff's rights to be free from unreasonable seizures in violation of the 4th, 14th U.S. Const. Amendments - N.Y. Const. Art I § 5, 6. And the statute of limitation should be tolled on wrongful confinement claim and for right to be free from unreasonable seizures because plaintiff remained held/seized on bail until March 6, 2012 (see Albright v Oliver, 114 S.Ct. 807, 815; cf. Burg v Gosselin, 591 F.3d 95, 96 (2d Cir. 2010)).

2. If you did not file a grievance but informed any officials of your claim, state who you informed, when and how, and their response, if any:

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

VI. Relief:

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount).

pursuant to claims in total; wrongful confinement / false imprisonment; malicious prosecution, abuse of process; slanderment, mental anguish, grief and despair of family, mother and child. Undue duress and deceitful coercion to enter guilty pleas; and for violations of plaintiff's 4,014 USCA right to be free from unreasonable seizures, NOR to be deprived of life liberty and limb without due process of Law - Plaintiff seeks \$925,000⁰⁰ dollars in total (nine hundred twenty five thousand) Plaintiff paid bail of \$11,500⁰⁰ dollars was remanded on bail of \$7,500⁰⁰ and another for \$3,500⁰⁰ plus Plaintiff's bail was raised extra \$5,000,00. Plaintiff spent approximately 90 days in jail until his family posted bails in distress and unbelief/shock.

In addition, plaintiff seeks relief because his (girlfriend's) car was impounded and plaintiff can not/could not pay for tickets or bills he was responsible for under girlfriend's name and insurance(s).

On these claims

VI.A. Previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action? Yes No See Exhibit B (Attached) Notice of Claim, dated May 29, 2012

B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff Kalonji Mahon
Defendants City of New York

2. Court (if federal court, name the district; if state court, name the county) Supreme Court BRONX COUNTY

3. Docket or Index number 250 434/14

4. Name of Judge assigned to your case Mitchell J. DANZIGER

5. Approximate date of filing lawsuit April 11, 2014

6. Is the case still pending? Yes No ?
If NO, give the approximate date of disposition April 15th, 2014

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) The case could not proceed because per judge Danziger's order: "I was required to pay an initial filing fee of \$125.00 before my case proceeded." But, ostensibly, Plaintiff is indigent and pro-se.

On other claims

C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment? Yes No

D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff _____
Defendants _____

2. Court (if federal court, name the district; if state court, name the county) _____

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

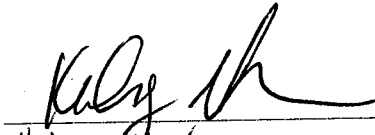
5. Approximate date of filing lawsuit _____

- 6. Is the case still pending? Yes No
If NO, give the approximate date of disposition _____
- 7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

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

Signed this 14th day of August, 2015

Signature of Plaintiff



Inmate Number

#1245136

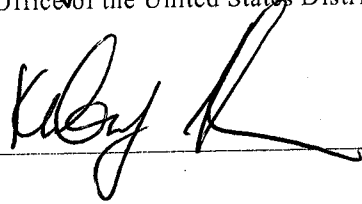
Institution Address

Kalonji Mahon
GREEN CORRECTIONAL FACILITY
P.O. Box 975
COXSACKIE, N.Y. 12051-0975

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 14th day of August, 2015, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:



- PL 220.06 Sub 01 Class D Felony NCIC 3599
- Tampering With Physical Evidence: Conceal/Destroy Class E Felony NCIC 4804
- PL 215.40 Sub 02 Class E Felony NCIC 4804
- Attempted Criminal Possession Controlled Substance- 7th Degree Class B Misdemeanor NCIC 3599
- PL 220.03 Class B Misdemeanor NCIC 3599

September 25, 2012
Sealed Upon Termination Of Criminal Action In Favor Of The Accused CPL160.50

-- Court: Bronx County Supreme Court Case Number: 48335C-2011

September 01, 2011

Initial Report Of Docket Number

- Criminal Possession Controlled Substance- 7th Degree Class A Misdemeanor NCIC 3599
- PL 220.03 Class A Misdemeanor NCIC 3599
- Resisting Arrest Class A Misdemeanor NCIC 4801
- PL 205.30 Class A Misdemeanor NCIC 4801
- Attempted Assault-3rd Degree Class B Misdemeanor NCIC 1399
- PL 120.00 Class B Misdemeanor NCIC 1399
- Harassment-2nd Degree: Physical Contact Violation NCIC 7099
- PL 240.26 Sub 01 Violation NCIC 7099

September 24, 2012

Dismissed CPL160.50

- Criminal Possession Controlled Substance- 7th Degree Class A Misdemeanor NCIC 3599
- PL 220.03 Class A Misdemeanor NCIC 3599
- Attempted Assault-3rd Degree Class B Misdemeanor NCIC 1399
- PL 120.00 Class B Misdemeanor NCIC 1399
- Harassment-2nd Degree: Physical Contact Violation NCIC 7099
- PL 240.26 Sub 01 Violation NCIC 7099

September 24, 2012

Dismissed

- Resisting Arrest Class A Misdemeanor NCIC 4801
- PL 205.30 Class A Misdemeanor NCIC 4801

September 25, 2012

Sealed Upon Termination Of Criminal Action In Favor Of The Accused CPL160.50

Interim release Status: Released on own recognizance (ROR)

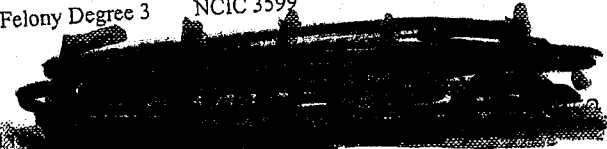
↓ Cycle 19 ↑

Arrest/Charge Information

Arrest Date: March 22, 2011 12:30 am (00:30:00)

Fax Number B16471
 Place of Arrest: NYCPD 47
 Arrest Type: Unknown
 Date of Crime: March 22, 2011
 Place of Crime: Bronx County, NY
 Criminal Justice
 Tracking No.: 64726713N
 Arresting Agency: NYCPD PCT 047
 Arresting Officer ID: 920817
 Arrest Number: B11624429
 Arrest Charges:

- Criminal Sale Controlled Substance-3rd:Narcotic Drug Class B Felony Degree 3 NCIC 3599
- PL 220.39 Sub 01 Class B Felony Degree 3 NCIC 3599



10/31/2012

- Criminal Possession Controlled Substance- 7th Degree
PL 220.03 Class A Misdemeanor Degree 7 NCIC 3599
- Resisting Arrest
PL 205.30 Class A Misdemeanor Degree 0 NCIC 4801

Court Case Information

-- Court: Bronx County Criminal Court Case Number: 2011BX016567

March 22, 2011

Arraigned

- Criminal Possession Controlled Substance- 7th Degree
PL 220.03 Counts: 2 Class A Misdemeanor NCIC 3599
- Resisting Arrest
PL 205.30 Counts: 2 Class A Misdemeanor NCIC 4801

March 22, 2011

Initial Report Of Docket Number

March 22, 2011

Transferred

March 22, 2011

Transferred To Superior Court

- Criminal Possession Controlled Substance- 7th Degree
PL 220.03 Class A Misdemeanor NCIC 3599
- Resisting Arrest
PL 205.30 Class A Misdemeanor NCIC 4801

March 22, 2011

Not Arraigned

- Criminal Sale Controlled Substance-3rd:Narcotic Drug
PL 220.39 Sub 01 Class B Felony NCIC 3599

March 06, 2012

Sealed Upon Termination Of Criminal Action In Favor Of The Accused CPL160.50

-- Court: Bronx County Supreme Court Case Number: 16567C-2011

March 23, 2011

Initial Report Of Docket Number

- Criminal Possession Controlled Substance- 7th Degree
PL 220.03 Class A Misdemeanor NCIC 3599
- Resisting Arrest
PL 205.30 Class A Misdemeanor NCIC 4801

March 05, 2012

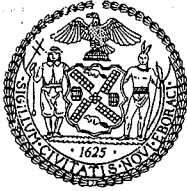
Dismissed

- Criminal Possession Controlled Substance- 7th Degree
PL 220.03 Class A Misdemeanor NCIC 3599
- Resisting Arrest
PL 205.30 Class A Misdemeanor NCIC 4801

April 03, 2012

Sealed Upon Termination Of Criminal Action In Favor Of The Accused CPL160.50

↓ Cycle 18 ↑



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
CLAIMS AND ADJUDICATIONS
1 CENTRE STREET ROOM 1200
NEW YORK, N.Y. 10007-2341

WWW.COMPTROLLER.NYC.GOV

Michael Aaronson
Chief, Bureau of Law and
Adjustment

015 - 151

John C. Liu
COMPTROLLER

Date: 01/09/2013
Claim No: 2013PI000704
RE: Acknowledgment of Claim

KALONJI MAHON# 12A5136
GREAT MEADOWS CORR FAC P O BOX 51
COMSTOCK, NY 12821

Dear Claimant:

We acknowledge receipt of your claim, which has been assigned the claim number shown above. Please refer to this claim number in any correspondence or inquiry you may have with our office.

We will do our best to investigate and, if possible, settle your claim. However, if we are unable to resolve your claim, **any lawsuit against the City must be started within one year and ninety days from the date of the occurrence.**

If you have any questions regarding your claim, you may contact us at either 212-669-8750 for property damage claims or 212-669-4445 for claims involving personal injury.

Sincerely,
Michael Aaronson

EXHIBIT B

Exhibit B.

Kalongi Mahon
Claimant,

-against-

THE CITY OF NEW YORK.
Defendant.

(NOTICE OF CLAIM)

TO: COMPTROLLER OFFICE
OF THE CITY OF NEW YORK:

PLEASE TAKE NOTICE that the claimant herein hereby makes this claim and demand against the City of New York as follows:

[1]. The name and post-office address of the claimant is as follows:

Mr. Kalongi Mahon
B&C NO: 218-12-00305

George R. Vierno Center
09-09 Hazen Street
East Elmhurst, New York 11370

[2]. The nature of the claim is as follows:

false arrest/wrongful imprisonment/malicious prosecution

[3]. The time when, the place where, and the manner in which the claim arose:

ON March 22nd, 2011

defendant was arrested for alleged Crim. Poss. Cont-Sub. 7^o (docket # 2011 BX 016567) ON BURKE AND HOLLAND AVE., BRONX, N.Y. in front of building on Holland Ave. off BURKE.

[1]

10467

Defendant tried to talk to a female body walking who in turn turned out to be an undercover cop and defendant was jumped and arrested by plainclothes officers after and they planted fake drugs on me

[4]. The items of damage or injuries claimed are:

Defendant was punched in face down to ground. And since I was on bail, my bail was remanded and defendant's mother had to post new more bail for all cases included this one claim arose from defendant's mother screamed at him and panicked causing me to suffer from ongoing mental anxiety and depression issues. The claim and demand is hereby presented for adjustment and payment.

PLEASE TAKE FURTHER NOTICE that by reason of the foregoing in default of the City of New York to pay to, the claimant his claim within the time limited for compliance with this demand by the City of New York by the applicable statutes, claimant intends to commence an action against the City of New York to recover his damages with interest and costs.

Dated: East Elmhurst, New York

May 29, 2012, 2012

Respectfully Yours,

for [Signature]
Claimant pro-se

(AFFIDAVIT OF SERVICE)

STATE OF NEW YORK)
COUNTY OF BRONX) ss:

I, Kalongi Mahon, being duly sworn,
deposes and says:

That I am the Claimant in the above-entitled action and
that I have on this 29 day of May 2012, served by Certified
Mail Return Receipt Requested, a true copy of the within Notice
of Claim against the City of New York, upon the Comptroller of the
City of New York, at the below address:

Office of the Comptroller
Of The City Of New York
1 Centre Street, Room 530
New York, New York 10007

Respectfully Submitted,

Kalongi Mahon
Claimant pro-se

Sworn to before me this
29 day of MAY, 2012
Kisha Murdaugh
NOTARY PUBLIC

KISHA MURDAUGH
COMMISSIONER OF DEEDS
No. 3-7429
Qualified in Kings County
Commission Expires November 1 2013

Kalonji Mahon, 12 AST 36
Green Correctional Facility
Box 975
Coxsackie, NY 12051

August 14, 2015

RECEIVED
SDNY PRO SE OFFICE

2015 AUG 24 P 3: 28

Pro-Se Intake Unit
U.S.D.C./S.D.N.Y.
500 Pearl Street, Room 200
New York, NY 10007

Re: Amended Complaint - Kalonji Mahon v. Burim Namani,
et al., 13 CIV 2032 (CM) (GWG)

Dear Clerk:

In memo endorsed / electronically filed on 7/27/15
(Document 24 or so) by Colleen McMahon: Plaintiff must
file an amended complaint forthwith, naming all defendants

Attached herein is Amended Complaint, naming all defendants
with supporting exhibits

Please electronically file to Defendants counsel, Asst. Corp. Counsel
City of New York, ...

Your attention to this matter will be greatly appreciated.

Please deliver to Judge McMahon accordingly.

Sincerely,
Kali 

cc: file

(AFFIDAVIT OF SERVICE)

STATE OF NEW YORK)
COUNTY OF BRONX) ss:

I, Kalongi Mahon, being duly sworn,
deposes and says:

That I am the Claimant in the above-entitled action and
that I have on this 29 day of May 2012, served by Certified
Mail Return Receipt Requested, a true copy of the within Notice
of Claim against the City of New York, upon the Comptroller of the
City of New York, at the below address:

Office of the Comptroller
Of The City Of New York
1 Centre Street, Room 530
New York, New York 10007

Respectfully Submitted,

Kalongi Mahon
Claimant pro-se

Sworn to before me this
29 day of MAY, 2012
Kisha Murdaugh
NOTARY PUBLIC

KISHA MURDAUGH
COMMISSIONER OF DEEDS
No. 3-7429
Qualified in Kings County
Commission Expires November 1 2013

LEGAL MAIL



NEW YORK STATE

GREENE CORRECTIONAL FACILITY
P.O. BOX 975
COXSACKIE, NEW YORK 12051-0975

NAME: Kaloni Mahon DIN: 12-1-106

RECEIVED
PRO SE OFFICE
2015 AUG 24 P 3:22

Pro-Se Intake, Clerk
United States Courthouse
U.S. D.C. Southern Dist. New York
500 Pearl Street, Rm. 200
New York, NY 10007

120510975
COXSACKIE, NY 12051
POSTAGE