

18CV3219

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

QUARLESS ADRIAN known as ADRIAN QUARLESS

Write the full name of each plaintiff.

No. _____
(To be filled out by Clerk's Office)

-against-

NYPD Midtown South Precinct

COMPLAINT
(Prisoner)

Do you want a jury trial?
 Yes No

Write the full name of each defendant. 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 above must be identical to those contained in Section IV.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. LEGAL BASIS FOR CLAIM

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

Violation of my federal constitutional rights

Other: _____

II. PLAINTIFF INFORMATION

Each plaintiff must provide the following information. Attach additional pages if necessary.

QUARLESS

ADRIAN

First Name

Middle Initial

Last Name

ADRIAN

QUARLESS

State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

3101800092 / CCRB # 201801279 / Internal Affairs # 7227

Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

Current Place of Detention

1818 HAZEN STREET

Institutional Address

EAST ELMHURST

N.Y

11370

County, City

State

Zip Code

III. PRISONER STATUS

Indicate below whether you are a prisoner or other confined person:

Pretrial detainee

Civilly committed detainee

Immigration detainee

Convicted and sentenced prisoner

Other: _____

IV. DEFENDANT INFORMATION

To the best of your ability, provide the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are identical to those listed in the caption. Attach additional pages as necessary.

Defendant 1: QUARLESS ADRIAN aka ADRIAN QUARLES
 First Name Last Name Shield #
Vice President of Entertainment
 Current Job Title (or other identifying information)
Madison Square Garden (32nd street & 7th avenue)
 Current Work Address
New York New York
 County, City State Zip Code

Defendant 2:

 First Name Last Name Shield #

 Current Job Title (or other identifying information)

 Current Work Address

 County, City State Zip Code

Defendant 3:

 First Name Last Name Shield #

 Current Job Title (or other identifying information)

 Current Work Address

 County, City State Zip Code

Defendant 4:

 First Name Last Name Shield #

 Current Job Title (or other identifying information)

 Current Work Address

 County, City State Zip Code

V. STATEMENT OF CLAIM

Place(s) of occurrence: Midtown Manhattan

Date(s) of occurrence: October 2015

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary.

To whom it may concern, Adrian Quarless, was wrongfully arrested by undercover police officer Randy Mercado of the Midtown South NYPD Precinct. Adrian Quarless was jailed for no reason. Causing medical pain to the back and lower spine. Adrian Quarless suffers from Post Traumatic Stress Disorder following a car accident and Midtown South NYPD Precinct. Officer Randy Mercado of NYPD Midtown South stole Adrian Quarless iPhone 5 and iPhone 6. Both devices responsible for managing the clients and agents at Madison Square Garden.

We have complained to Internal Affairs Detective Garcia. Log # 7227 In regards to case # 3101800092. It has been 4 years since the original arrest and NYPD Midtown South have failed to present a prima facie case.

We have spoken to civil attorneys and are seeking damages against the city because

of NYPD Midtown South negligence for \$5,000,000.

We have spoken to doctors, psychiatrist, dentist and neurologist. We have even lettered the forensic psychiatric office at Manhattan Supreme Court. It is frustrating that Midtown South NYPD would voluntarily hurt

Madison Square Garden entertainment manager, Adrian Quarless. The loss of time, medical prescription drugs are inadequate and complicated. Court records show NYPD officer Randy Mercado and NYPD Midtown South as being malicious violating Adrian Quarless rights under

INJURIES: United States Constitution.

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

NYPD Midtown South has caused several injuries to Quarless Adrian known as Adrian Quarless. Including loss of compensation from Madison Square Garden. Damaged spine of lower back, blurry vision because missing contact lenses, swollen left lung causing breathing difficulty and seizures in hospital.

VI. RELIEF

State briefly what money damages or other relief you want the court to order.

We would like the court to know. We work alongside, Adrian Quarless with coworkers Neil Portnow of the Recording Academy. We host and manage Madison Square Garden and the 60th Grammy Music Awards at Madison Square Garden.

We would like the court to suit in Manhattan Federal Court for \$5,000,000.

VII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

April 5th, 2018

Dated



Plaintiff's Signature

ADRIAN (QUARLESS)

First Name

Middle Initial

QUARLESS (ADRIAN)

Last Name

Prison Address

East Elmhurst

County, City

N.Y

State

11370

Zip Code

Date on which I am delivering this complaint to prison authorities for mailing: _____

Attention: United States District Court

I would like the Federal Court to order \$5,000,000 in damages from this bad/false arrest.

Please begin the process of this request and send any civil suit details to: ADRIAN QUARLESS

QUARLESS ADRIAN

1818 HAZEN STREET

EAST ELMHURST, N.Y, 11370

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE THAT ADRIAN QUARLESS (Defendant)

we are ordering the courts to dismiss any old charges by 2014 Judge Bonnie Wittner pursuant to section 210.20; 220.30 of the criminal procedure law upon the grounds that the evidence is fabricated by MIDTOWN SOUTH PRECINCT OFFICER- RANDY MERCADO

The original charge of - A MISDEAMEANOR: 165.40

"criminal possession of stolen property in the fifth degree."

Our team of medical doctors CIVILIAN COMPLAINT REVIEW have found ADRIAN QUARLESS to be a layperson.

UNSKILLED in the matters of the law and seek this HONORABLE COURTS indulgence for errors made by the MIDTOWN SOUTH PRECINCT. The charges have been reviewed with errors, defects and faults pursuant to sections 103(3) and 2101(f) of the Civil Practice Law and Rules

On or ABOUT THE DAY THE DEFENDANT WAS ARRESTED.

02/27/2018 - No Judge, No Attorney. REMAND

CCRB # 201801279

Internal Affairs # 7227

Log

Attention:
United States
District Court
Southern District.

Defendent &
person making
complaint is -

ADRIAN QUARLESS
Address -
1818 Hazen Street
East Elmhurst, N.Y,
11370

Since 2014 almost 4 years ago. MIDTOWN SOUTH have fail
to ~~present~~ a Prima Facie case. The defendent seeks
dismissal of the charge pursuant to section 210.20.

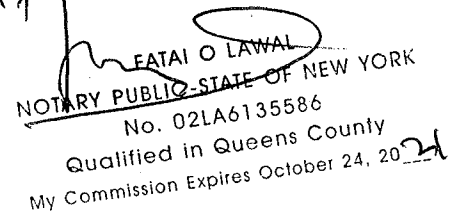
Respect~~fully~~fully the medical doctors at the hospital,
Civiliant Complaint Review Board, The Police Headquart
ask the new Judge that the case be DISMISSED

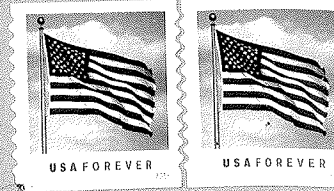
RESPECTFULLY SUBMITTED



ADRIAN QUARLESS

Sworn to before me
2/24/17


FEATAI O LAWAL
NOTARY PUBLIC-STATE OF NEW YORK
No. 02LA6135586
Qualified in Queens County
My Commission Expires October 24, 2021



RIAN QUARLESS

118 HAZEN STREET
EAST ELMHURST, N.Y.,
11370

USM⁰³
SLVY



SOUTHERN DISTRICT OF NEW YORK

U.S. MARSHAL'S OFFICE
500 PEARL STREET, Suite # 400
NEW YORK, NEW YORK, 10007

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