



# Cannatelli Law Offices

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*Brian J. Sullivan*

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City Clerk  
City of Meriden  
City Hall  
142 East Main Street  
Meriden, Conn.  
06450

Dear City Clerk:

Re: NOTICE OF INTENT TO SUE PURSUANT TO C.G.S. SECTION 7-465

I represent Police Officer Brian Sullivan, who is about to commence a civil action against the following city officials: Personnel Officer Caroline Beitman; Chief Jeffry W. Cossette; Deputy Chief Timothy S. Topulos; Det. Lt. Walerysiak; Capt. M. Zakrzewski; Sgt Leonard Caponigro; Lt. Glenn Mislagle; Det. Michael Siegle, President-Local 1016; John Williams, Union Steward; Police Officer Even Cossette; Sgt. Carusone.

On or about Oct. 3<sup>rd</sup>, 2011, an internal affairs complaint was initiated against Officer Huston based upon charges of untruthfulness, dishonesty, neglect of duty, and violation of his oath. The complaint was one of many bogus complaints filed against Huston which was not sustained on or about January 12<sup>th</sup>, 2012. Because Sullivan helped and supported Huston, he too was singled out by the Police Department.

On or about Feb. 14<sup>th</sup>, 2012, while on duty, Officer Sullivan was approached by the chief's wife, interfering with an official investigation. When asked for help by his Supervisors, he was denied the same. Officer Sullivan sought help from City Hall, which too was denied.

Officer Sullivan alleges a course of conduct going all the way back to November of 2010 which illustrates a violation of Section 1962 of the Federal RICO Statute. Officer Sullivan alleges injury to his business or property by the above-named persons, who all have engaged in a pattern of racketeering connected to creating, controlling or acquiring an enterprise used for Racketeering purposes, to wit: the Union Officials garnered support from rank and file officers in order to tamper with witnesses to Protect Illegal Police Conduct, stemming from the Pedro Temich incident in May of 2010 to the present; they have obstructed Official Investigations stemming from the Temich and Methvin incidents of May of 2010 and October of 2010; All officials named have created an atmosphere of hostility and asked fellow-officers to withhold evidence pertaining to those incidents mentioned. They have also



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asked officers to cover-up information vital to a federal investigation. They have used the Internal Affairs Division to hurt Officer Sullivan and other officers who have co-operated with official investigations, and have created a corrupt internal affairs division that acts based upon favoritism and nepotism. Officer Cossette was never properly prosecuted by the police or Internal Affairs for unjustified and illegal force used against individuals Temich and Methvin. Sullivan was suspended for conduct which led to an arrest, while Lt. Lawrence Guidobono was arrested on two occasions for similar conduct resulting in no discipline.

Officer Sullivan alleges a pattern of Nepotism and Favoritism, and Disparate Treatment, for his actions constituting a thorough investigation pertaining to how the Meriden Police Department Internal Affairs Division is used by the Chief to harm officers who challenge illegal police conduct. Further, Officer Sullivan has a disparate treatment claim pending which was filed as a grievance back in January of 2011, but is at the step three phase and not resolved yet. Officer Sullivan alleges disparate treatment for utilizing the grievance process and disparate treatment for not being able to have his Internal Affairs Complaints investigated like other similarly situated officers.

Sullivan has been singled out for disciplinary action, and marked by the Chief and a majority of other officers named for inquiring into the Temich and Methvin cases. When letters of intent to sue were filed on or about March 28<sup>th</sup>, 2011, and officer Huston sought Freedom of Information regarding these matters, with Officer Sullivan's help, the Administration retaliated against Officers Huston and Sullivan from that date forward. This especially is true when other officers named and the Union discovered that Huston and Sullivan were co-operating with Federal Authorities regarding Meriden Police Department Corruption.

Once discovered, the Union and officers and supervisors named have harassed Officer Sullivan because of his sexual preference. They have called him names, and singled him out. They have created an atmosphere impossible for Officer Sullivan to work. When the union and management discovered that Sullivan and Huston whistle blew on April 1, 2011, both the union and the Chief used the internal affairs division to unlawfully harm both officers for whistle blowing and then co-operating with the Federal Investigation. Officer Sullivan is a victim of unlawful Meriden Police Conduct, despite the fact he is a police officer.

The Union, by means of the President and Stewart, has requested that Union Members file Internal Affairs complaints against Huston and Sullivan to harass, and to intimidate them, and to create a hostile work environment for both officers. Said union members complied by filing frivolous internal affairs complaints, which were all sanctioned by the Chief and City Hall, because Sullivan's right to notice and a right to be heard, were frustrated in that actual notice of said complaints, never came from internal affairs, or the City, but the Record Journal. No investigation into how this occurred ever was initiated.



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The City of Meriden, with the Police Chief, have allowed this atmosphere of intimidation, and threats to permeate the Department with no regard for Officer Sullivan's Constitutional Rights. All of this was and is being done to frustrate an official federal investigation.

Thus, Officer Sullivan alleges a pattern of abuses which include: Obstruction of Justice, See Section 1961(1)(B); He also alleges Obstruction of a Criminal Investigation, and Tampering with Witnesses, and Retaliation for co-operating with Authorities to Correct Illegal Police Conduct, see Section 1961(1)(B). All this has occurred, and is still occurring in his capacity as a police officer while working and continuing to work for the Meriden Police Department from approximately 2010 to the present. It is still occurring and continues to occur.

Beside alleging a criminal pattern of behavior with more than two incidents of serious illegal criminal violation of the law based upon predicate said acts, Brian Sullivan alleges a pattern of conduct with a criminal purpose in mind, to obstruct an official investigation, and to use police officers to cover up facts instrumental in a criminal investigation, encouraging officers to lie or not be truthful, in an effort to protect certain individuals. The crimes include obstruction, tampering, perjury, which also amount to civil rights violations.

Officer Sullivan also alleges a 42 USC 1983, 1984, 1985, 1986 and 1988 violations of his civil rights. Each officers or official named has acted, and or continues to act individually, and or in concert to violate the constitutional rights of Officer Sullivan. Officer Sullivan alleges that when he and Officer Huston whistle blew back in April of 2011, he has utilized his First Amendment right to communicate Police Corruption, which is a matter of Public Concern. This communication was made to the proper authorities. As a result, Officer Sullivan has been threatened by police officers continuously from that date on, and harassed by police officers in front of supervisors who have also played a role in said harassment. Officer Sullivan has been tormented by Union Officials, encouraging other officers to single him out by filing frivolous Internal Affairs Complaints against him for coming to the aid of criminal defendants who have been brutalized by fellow officers. He has been punished for telling the truth continuously until the present. He is being punished for breaking the Code of Silence.

Officer Sullivan has had his requests for investigations ignored by City Hall and the Chief and Internal Affairs Division. He has been singled out for not protecting the Police Officer Code of Silence. He has been retaliated against for communicating Police Abuse in the Meriden Police Department and for co-operating with federal authorities. He has been treated differently from other similarly situated officers. He has been singled out for discipline when other officers have done much worse from 2010 to the present.



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Officer Sullivan places the City of Meriden on Notice that each officer named above will be named in Civil RICO Suit, and will also be named in a 42 USC 1983, 1984, 1985, 1986, and 1988 action for violations of his civil rights. Officer Sullivan also alleges a First, Fourth and Fourteenth Amendment Right Violation, with the aforementioned statutes already mentioned.

Dated at Ansonia, Connecticut, this 18<sup>th</sup> day of February of 2012.

Yours, very truly,

Frank P. Cannatelli