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Michael Dearington, Esq.
State's Attorney GA 23
235 Church Street
New Haven, CT 06510

Re: Perjury Charges against Officer Evan Cossette (#436) for Meriden Police Incident Report Case No. 01-11-000614 and Narrative for Arrest of Joseph G. Bryans on 1/23/2011

Dear State's Attorney Dearington:

I am writing to you on behalf of my client Joseph G. Bryans to press perjury charges against Officer Evan Cossette (#436) for writing a false police report which led to arrest of Mr. Bryans on 1/23/2011. A surveillance video from MidState Medical Center which was produced recently in discovery in the civil case pending in Federal court, Bryans v. Cossette, et al., Docket Number 3:11-cv-01263 (JCH), makes it abundantly clear the police report written by Officer Cossette, is (to put it charitably!) blatant prevarication – it is a piece of fiction.

The video was not available until last month so it was not possible to determine that the police report was patently false until this time. A summary of the salient point are as follows:

- Officer Cossette's Narrative state's that "Joseph was running through the hospital's rear parking with hospital security in pursuit." In contrast, the video depicts Mr. Bryans as walking with a steady gait (not running!) through the parking lot, where he was headed in an attempt to get off hospital property so he could smoke a cigarette, and then return to have the laceration on his thumb treated. Bryans does not appear agitated or combative.
- Officer Cossette grabbed Mr. Bryans as soon as he exited his cruiser and slammed him to the ground. In his Internal Affairs interview, Officer Cossette states that he approached Mr. Bryans calmly and said "Sir" and tried to reason with him.
- To prevent him from engaging in a foot pursuit, Officer Cossette writes that he held his arm at which point Mr. Bryans clenched his fists and tensed up. Allegedly Mr. Bryans took a fighting posture, according to Officer Cossette's Report, which is also patently false.
- In reality, Mr. Bryans had no idea the police were coming for him. The video shows that Mr. Bryans did not look back.
- There was not enough time for Officer Cossette to have done all the things he reported that he did. The total amount of time it took Officer Cossette to exit his cruiser to the point Officer Cossette began to take Mr. Bryans down to the ground is 1:10 minutes.

- You can clearly see that Officer Cossette's Narrative does not correspond to the scene depicted on the video, and that the report appears to have created out of whole cloth.
- Officer Cossette exits his car, grabs Mr. Bryans, promptly tackles him and slams him to the ground.
- Then Officer Cossette wallops Mr. Bryans repeatedly. Officer Cossette clearly reacted too quickly to have been able to give five orders.

What's even worse is that Officer Cossette tasered Mr. Bryans as well. The report states that "Joseph did not complain of any injury further than his initial reason for treatment" – another blatant falsehood, as Officer Cossette had Bryans handcuffed so tightly to the bedposts that his hands were turning blue, and Bryans complained vociferously and repeatedly asked Cossette to loosen the cuffs, which request was refused.

The MidState medical records triage note indicates that Mr. Bryans chief complaint was a cut on his hand from glass – there is absolutely no notation that treatment had anything to do with alcohol, and his blood was never drawn by hospital staff. The Fall risk indicates that patient is fully oriented and aware of his ability, which means sobriety is a non-issue.

In conclusion, the blatant prevarication of Officer Cossette's police report should not be countenanced and we are requesting that your office fully prosecute this matter.

Attached to this letter are the following Exhibits:

1. Meriden Police Incident Report Case No. O1-11-000614
2. Affidavit by Cossette re Bryans Incident Report, 1/23/2011
3. Uniform Police Report, Bryans, 1/23/2011
4. Criminal Appearance Surety Bond \$2500, Bryans, 1/23/2011
5. Bryans' Citizen's Complaint, 2/15/2011
6. Internal Affairs Investigation IA 11-03
7. Joey Bryans Conviction on 3/23/2011
8. Roberts Letter to Preserve Evidence MidState Medical Center, 3/28/11
9. Statement, Courtney Larson, 4/18/2011
10. Letter from Attorney Manning regarding Discovery in Bryans v. Cossette, 3/13/2012
11. Video disc and How To View Instructions
12. New Articles re Surveillance Video (Courant, Record Journal, WTNH 8), 4/24/2012
13. MidState Medical Records Note re Triage, 1.23.2011
14. Photos (Meriden Police in MidState parking lot; Mr. Bryans in hospital gown)
15. Englehart Cartoon, 4/26/2012

Sincerely,

Sally A. Roberts

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SAR/s

Encls.