

NOTICE OF INTENT TO COMMENCE ACTION

Certified Mail – Return Receipt Requested

DATE: March 28, 2011

TO: Irene Masse, City Clerk
Office of the City Clerk
Meriden City Hall
142 East Main Street
Meriden, CT 06450

PLEASE TAKE NOTICE pursuant to Connecticut General Statutes Section 7-465 and 7-101a and all other pertinent statutory provisions, that **JOSEPH G. BRYANS** intends to bring an action due to damage to person and deprivations of his common law civil rights under the Constitution and laws of the United States and the State of Connecticut sustained as a result of actions taken by **OFFICER EVAN COSSETTE** (436), and/or the City of Meriden, which were deliberately indifferent toward and violative of his common law and civil rights under the law, including his right to be free from unreasonable force, to wit: Without lawful consent, probable cause, or other legal justification, Officer Evan Cossette proceeded to tackle Mr. Bryans, hurl him violently to the asphalt, and after he was handcuffed, taser him several times. Subsequently, once Mr. Bryans was handcuffed to the hospital bed, Officer Cossette did not loosen the cuff on Mr. Bryans despite Mr. Bryans repeated request to loosen the cuffs until after nerve damage was sustained to Mr. Bryans left wrist.

Date of Incident: On or about January 23, 2011

Place of Incident: MidState Medical Center
435 Lewis Avenue
Meriden, CT 06451

Person Suffering Damage:

Joseph G. Bryans

Injuries:

Joseph G. Bryans suffered multiple contusions, abrasions, bruises, cuts and taser burns to his right back, right ribcage, ankles, knees, left hip and for improper hand cuffing, nerve damage to his left wrist Officer Cossette tackled Mr. Bryans in the parking lot area immediately adjacent to the MidState Medical Center, hurled Mr. Bryans to the asphalt, punched him in the right rib cage, and after Mr. Bryans was handcuffed, applying multiple taserings to his back. Later, when handcuffed to the hospital bed, Officer Cossette applied the cuffs too tightly and would not loosen them until after Mr. Bryans suffered from nerve damage to his left wrist.

Alleged Violations:

Violation of Joseph G. Bryans's Constitutional rights relating unreasonable use of force, pursuant to the provisions included in the Fourth, Fifth, Sixth, Eighth and/or Fourteenth Amendments to the U.S. Constitution and to comparable sections of the Connecticut Constitution, including Article 1, Sections 7, 8 and/or 9, respectively, and violation of common law rights, including his rights to be free from infliction of unreasonable force and emotional harm.

Dated at New Britain, Connecticut, this 28th day of March, 2011.

Joseph G. Bryans

By: *Sally A. Roberts*

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