

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 **ROBERT A. METHVIN** 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 deliver knee strikes to the head of Mr. Methvin while Methvin was lying defenseless face down on the ground with his hands cuffed behind his back. The knee strike severely injured Methvin. His teeth were pushed through his lower lip and he sustained facial injuries. The lacerations caused by his teeth had to be stapled closed. Methvin's facial injuries caused him to lose a large amount of blood.

Date of Incident: On or about October 5, 2010

Place of Incident: 3 Pasco Street,
Meriden, CT 06451

Person Suffering Damage: **Robert A. Methvin**

Injuries: Robert A. Methvin suffered multiple contusions, abrasions, bruises, and cuts to his upper lip and facial area when Officer Cossette delivered the knee strike to Methvin's head, while Methvin was lying defenseless, face down, with his hands cuffed behind his back, all of which caused Mr. Methvin great pain as he had to endure the pain in the swollen lip and facial area of his body, all of which required treatment at MidState Medical Center, and follow up care.

Illeged Violations: Violation of Robert Methvin'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.

Robert A. Methvin

By: *Sally A. Roberts*
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