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In the Matter of Ghenya Grant,

Claimant,

-against-

NOTICE OF CLAIM

County of Suffolk, Suffolk County Police Department,
Police Officers Matthew Friedrich, Michael Sweet,
Robert Mroczkowski and Police Officers
"John and Jane Does 1-10",

Respondents.

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To: Suffolk County Attorney
H. Lee Dennison Building
100 Veterans Memorial Hwy
PO Box 6100
Hauppauge, New York 11788

Suffolk County Police Department
30 Yaphank Avenue
Yaphank NY 11980

1. The name and address of the claimant and claimant's attorney;

Claimant

Ghenya Grant
54 27th Street South
Wyandanch, NY 11798

Attorneys

The Law Offices of Frederick K. Brewington
556 Peninsula Boulevard
Hempstead, NY 11550

2. The nature of the claim:

To recover money damages for humiliation, embarrassment, mental anguish, pain and suffering suffered by the Claimant due to the reckless, careless, negligent, intentional and callous acts of the Respondents, their agents, servants, employees and/or officers in the discrimination, wrongful ejection, abuse of process, limiting public accommodations, selective enforcement, intentional interference with contract, and violation of civil and Constitutional rights of Ghenya Grant, all caused by the negligent hiring, training, retention, failure to discipline, failure to supervise, acts of negligence, recklessness and intentional acts of the County of Suffolk, Suffolk County Police Department, their agents and employees, including but not limited to Police Officer Matthew Friedrich, Police Officer Michael Sweet, Police Officer Robert Mroczkowski, and Police Officers "John and Jane Does 1-10" and others.

Claimant, Ghenya Grant is a Black African-American woman. Claimant was verbally assaulted and abused, falsely accused, set out to public ridicule and made to suffer injury to her good name, her personage, her mental state and mind, without reason, legal basis or justification by

County of Suffolk, Suffolk County Police Department, their agents and employees, including but not limited to Police Officer Matthew Friedrich, Police Officer Michal Sweet, Police Officer Robert Mroczkowski, and Police Officers "John and Jane Does 1-10" and others. Claimant was treated in this manner in violation of her rights and/or because of her gender, race and color.

3. The time when, place where and the manner in which the claim arose:

On or about August 16, 2014 at about 5:30 p.m., at the Infinity Diner, 663 Route 109, West Babylon, NY, Ghenya Grant (an African-American woman) was a customer/patron at the Infinity Diner where she went to meet a friend and have a meal. Upon arriving and asking for booth she was initially seated in a booth. While waiting for her friend, Claimant was told that she had to vacate the table at which she was then seated and give same to a white family. Claimant politely declined to move. There after without providing proper service Claimant was told that she had to leave the restaurant and that she would not be served. In response, Ms. Grant indicated that she had a right to be served and that she was not obliged to leave. The manager of the Infinity Diner then became belligerent and stated in a nasty manner, "then you stay right there". Claimant then went to the front desk to see what the problem was and was then attacked verbally by the manager stating in relevant part, "I am not serving you". Upon Ms. Grant asking about this comment, the manager began to yell at Claimant and shouting "I am not serving you!" Ms. Grant's friend (an African-American woman) soon arrived and they then proceeded to go sit at a table. The waitress then comes to serve them at this table and the manager then comes and yells, "No-don't serve them" and then motions the waitress away. The waitress followed his directive.

Claimant, astounded, waits to be served and then just a few minutes later, members of the Suffolk County Police Department come into the diner and come to the table at which she and her friend are then seated and they tell her "this is private property, the manager doesn't want you here and you have to leave." Claimant and her friend were, upon information and belief, the only African-American patrons in the diner at that time. Ms. Grant asks the police how this treatment was fair that they were being forced to leave, to which the police officer stated, "It's not fair...it's the way it works here and they have the right to make you leave." Claimant protested her and her friend being forced to leave and the police insisted stating that she must leave to which the police stated, "it's private property". Then a second man from the diner came running over yelling "we don't have to serve you it says we only have to serve the people we like" as he waived a menu.

Surprised about this blatant animosity and verbal assault, Claimant says to the police, "what does that mean?" The police then tell that person to get away and continue to claim that she had to leave because it is private property. As client begins to gather herself and her belongings she says to the police, "it is not fair that they can decide not to serve me because of the color of my skin." Then the police immediately get more aggressive and threaten Ms. Grant with arrest and assaulted her pushing her toward the door. Upon being physically touched in an unwelcome and threatening fashion, Claimant, began to turn, walking backward, to the door to prevent from being pushed in the back and stated, "you don't want me to talk about race", to which the police responded---"you're making a scene." The officer then made several comments and Ms. Grant and her friend then exited the diner under threat of arrest and after being physically ejected from the diner. While standing on the sidewalk outside the diner, Ms. Grant speaks to the police and says, "Let me get this straight, if

they don't like you because of the color of your skin, they can decide not to serve you?" In response to the question and in front of a witness each of the police responded in unison, "Yes!" To which, Ms. Grant, shocked, says, "No, that is an EEOC complaint" and then departed in a shaken sense of disbelief and horror.

4. The items of damage and injury claimed are:

Claimant, Ghenya Grant sustained multiple injuries including, but not limited to mental anguish, mental pain and suffering, violation of civil rights, loss of freedom, loss of liberty, unequal treatment, loss of comfort, denial of access to equal rights, extreme mental stress, loss of security in her person, psychological damages, damage to her name and reputation, humiliation, embarrassment, and restriction on her free choice and liberty, monetary damages, special damages, cost/fees/expenses, and related damages incurred by and on behalf of Claimant for the recklessness, carelessness, gross negligence, negligence, intentional conduct, malicious conduct, violation of civil rights, and unlawful and abusive conduct of the agents, servants, officers, employees and/or representatives of the County of Suffolk, Suffolk County Police, including but not limited to Police Officer Matthew Friedrich, Police Officer Michal Sweet, Police Officer Robert Mroczkowski, and Police Officers "John and Jane Does 1-10" and others.

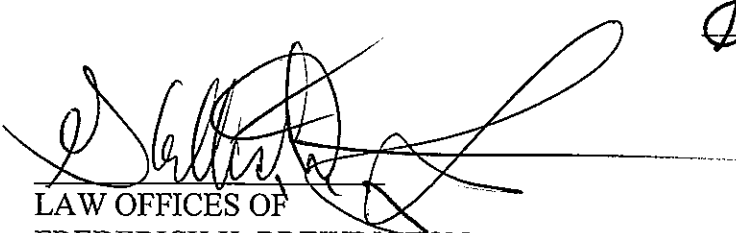
These wrongful and abusive acts served to subject Claimant to humiliation, embarrassment, mental anguish, pain and suffering due to the abuse, reckless, careless, negligent, intentional, violative and callous acts of the Respondents who engaged in blatant and unabashed discrimination and interference with her right to be served and take full advantage of the public accommodations offered to other similarly situated persons who were not African-American women.

The undersigned Claimant therefore, presents this claim for adjustment and payment in an amount that exceeds all jurisdictional limits of all courts. You are notified that unless it is adjusted and paid within the time provided by law from the dated of presentation to you, the claimant intends to commence an action in a court of appropriate jurisdiction on this claim.

Dated: Hempstead, New York
November 12, 2014



GHENYA GRANT



LAW OFFICES OF
FREDERICK K. BREWINGTON
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556 Peninsula Boulevard
Hempstead, New York 11550

STATE OF NEW YORK)
)ss.:
COUNTY OF NASSAU)


GHENYA GRANT

Notary Public

