
United States District Court
EASTERN DISTRICT OF NEW YORK

RAFFIQUE N. KHAN,

Plaintiff

–v–

NEW YORK CITY;

ERIC L. ADAMS, Mayor, New York City, in his official capacity;

NEW YORK CITY POLICE DEPARTMENT (NYPD)

EDWARD A. CABAN, Police Commissioner, in his official capacity;

MICHAEL GERBER, Deputy Commissioner of Legal Matters (DCLM), in his official capacity;

Inspector **ROHAN GRIFFITH,** Commanding Officer, 75th Precinct, in his official capacity

NYPD Officer **MATTHEW S. BESSEN,** Shield No 14934; and NYPD Officers John and Jane Doe Nos 1–10, who were directly involved in the arrest and imprisonment of Raffique N. Khan;

NYPD Officer **JOSEPH ASTARITA;** and NYPD employees John and Jane Doe Nos 1–10, of “DG_LIC-Incidents,” “DG_LIC-Hearings-Appeals involved in refusing to return the firearms unlawfully seized from Raffique N. Khan,

Defendants

COMPLAINT

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COMPLAINT

Plaintiff Raffique N. Khan, (“Plaintiff”) by and through his attorneys, The Law Offices of Cory H. Morris, bring this action to redress the violation of Plaintiff’s rights under the both the New York Constitution and Laws of the United States and complain of the Defendants (“Defendants”) as follows:

JURISDICTION

1. This is an action pursuant to 42 U.S.C. Section 1983 and 42 U.S.C § 1988 to redress the deprivation under color of statute, ordinance, regulation, custom or usage of rights, privileges and immunities secured to plaintiff by the New York State Constitution and the Second, Fourth, Fifth, Eighth and Fourteenth Amendments to the United States Constitution.
2. Jurisdiction is conferred on the Court by 28 U.S.C. §1343(3) which confers original jurisdiction on Federal District Courts in suits to redress the deprivation of rights, privileges and immunities as stated in Paragraph two (2) thereof.
3. The plaintiff demands a trial by jury.

VENUE

4. Plaintiff is a resident of Queens County in New York City.
5. Defendants are residents of or have their principal place of business in New York City.
6. Plaintiff obtained citizenship through military service, is not originally from this country, and has a darker skin tone than Caucasian/white persons.

THE PLAINTIFF

7. At all the times relevant to this Complaint and at the present time, Plaintiff Raffique N. Khan was and he still is a citizen of the United States of America:

That Plaintiff Raffique N. Khan retired from the United States Army with the rank of Staff Sergeant (“SSGT”) on July 24, 2015 (**Exhibit 1**, DD-214) by reason of service connected disability as a result of wounds incurred during an insurgent attack on FOB Salerno, in Afghanistan, on June 1, 2012, “After a Suicide Vehicle Borne Improvised Explosive Device destroyed the DFAC where he and his team were eating, SGT Khan extracted trapped personnel from the wreckage and initiated first aid on the wounded. He engaged advancing insurgents with M16 fire, and continued to provide security at an impromptu casualty collection point until the attack was defeated and the casualties evacuated. For his heroic actions, SGT Khan was awarded the Bronze Star Medal for Valor (**EXHIBIT 2**. Bronze Star citation) and the Combat Action Badge, and also received the Purple Heart (**EXHIBIT 3**. Purple Heart citation) for his injuries. (**EXHIBIT 4**, Veterinary Service News, May 2013)

PLAINTIFF’S FIREARM PERMITS

8. On April 11, 2023, New York City, through the 113 Precinct of the New York City Police Department (“NYPD”) issued Lic: PR2023001500, a “Restricted Handgun License” for “Residential Premises” to Plaintiff Raffique N. Khan. (**EXHIBIT 5(a)**. Residential Premises Handgun License)
9. At all the times relevant to this Complaint and at the present time, handgun license PR2023001500 is in full force and effect.

10. On September 1, 2023, New York City, through the 113 Precinct of the NYPD issued Lic: CB2023005726, a “Concealed Carry Handgun License” to Plaintiff Raffique N. Khan. **(EXHIBIT 5(b). Concealed Carry Handgun License)**
11. At all the times relevant to this Complaint and at the present time, handgun license CB2023005726 is in full force and effect.
12. On September 13, 2023, the License Division of the NYPD issued a “Handgun Purchase Authorization” bearing Serial No. 308191 allowing Plaintiff Raffique N. Khan to purchase one handgun for permitted concealed carry and residential premises. **(EXHIBIT 5(C). Handgun Purchase Authorization)**
13. Pursuant to that Handgun Purchase Authorization, Plaintiff Raffique N. Khan did purchase from Woodhaven Rifle & Pistol, an S&W “Equalizer” handgun, SKU# PJH 2036 which was similar to the handgun he used in combat during his service in the United States Army. **(EXHIBIT 6. Handgun invoice)**
14. During April, 2023, Plaintiff Raffique N. Khan completed a “Concealed Carry Firearm 18 Hour Training Course for which he was issued a Certificate by Woodhaven Rifle & Pistol Range, Inc. **(EXHIBIT 7. Certificate)**
15. Plaintiff Raffique N. Khan is presently employed by the United States Department of the Interior National Park Service at the Gateway National Recreation Area in Staten Island as an Environmental Protection Specialist **(EXHIBIT 8. USOPM Form 50)** and has carried his handgun pursuant to the permits issued to him since the date it was purchased.

DEFENDANTS

16. At all the times relevant to this Complaint and at the present time, Defendant **NEW YORK CITY** was and is the policy-making and governing body and authority over Defendant NYPD.
17. At all the times relevant to this Complaint and at the present time, Defendant **Eric L. Adams**, is the elected Mayor of New York City (hereinafter “Adams” or “Mayor Adams”), and is the chief policy maker for the executive branch of New York City government, including the NYPD and, as such, is responsible for the practices and policies of the NYPD.
18. Defendant Eric L. Adams is a state actor.
19. Defendant New York City Mayor, Eric L. Adams, is sued in his official capacity only.
20. At all the times relevant to this Complaint and at the present time, Defendant **EDWARD A. CABAN** is the New York City Police Commissioner and as such is a policy maker and responsible for NYPD practices and policies.
21. Defendant Edward A. Caban is a state actor.
22. Defendant Police Commissioner Edward A. Caban is being sued in his official capacity only.
23. At all the times relevant to this Complaint and at the present time, **MICHAEL GERBER** is the New York City Deputy Commissioner of Legal Matters (DCLM), and, as such, among other responsibilities is in charge of handgun licensing, and as such is a policy maker in the New York City government.

24. At all the times relevant to this Complaint and at the present time, as the New York City Deputy Commissioner of Legal Matters (DCLM), Defendant Michael Gerber is responsible for the training and supervision of NYPD officers such as Defendant Officer **MATTHEW S. BESSEN** and Officers John and Jane Doe 1–10 and, as such, Michael Gerber is a policy maker in the New York City government.
25. Defendant Michael Gerber is a state actor.
26. Defendant New York City DCLM Michael Gerber is being sued in his official capacity only.
27. At all the times relevant to this Complaint and at the present time, Defendant Inspector **ROHAN GRIFFITH**, is the Commanding Officer of the NYPD 75th Precinct and, as such, is responsible for the training and supervision of NYPD officers, including but not limited to, Defendant Officer **MATTHEW S. BESSEN** and Officers John and Jane Doe 1–10.
28. Defendant Rohan Griffith is a state actor.
29. Defendant Rohan Griffith is sued in his official capacity.
30. Defendant NYPD Officer **MATTHEW S. BESSEN**, Shield No 14934 is a state actor.
31. NYPD Officer **JOSEPH ASTARITA** is a state actor sued in his individual and official capacity.
32. Defendants NYPD Officers John and Jane Doe Nos 1–10, are known to the defendants, individually and collectively, as assigned and working out of the NYPD, but their identities are unknown to the Plaintiff at this time other than that they are in some way responsible for the constitutional deprivations

suffered by the PLAINTIFF RAFFIQUE N. KHAN by arresting, processing, and imprisoning him.

33. Defendants NYPD Officers John and Jane Doe Nos 1–10, are each state actors sued officially and individually.
34. NYPD employees John and Jane Doe Nos 1–10, together with NYPD Officer **JOSEPH ASTARITA** were involved in refusing to return the firearms unlawfully seized from Raffique N. Khan, are known to the defendants, individually and collectively, but their identities are unknown to the Plaintiff at this time other than that they are in some way responsible for the constitutional deprivations suffered by the Plaintiff Raffique N. Khan by unlawfully seizing and then refusing to return his firearms for which he had valid licenses to carry and possess.
35. Defendants NYPD employees John and Jane Doe Nos 1–10, are each state actors.
36. Each of the Defendants in the regular course of their employment acted under color of State law.
37. At all the times relevant to this Complaint and at the present time, each of the Defendants, individually and collectively, in some way specific to their positions in law enforcement deprived and denied Plaintiff Raffique N. Khan his Constitutional and civil rights in the regular course of their employment acting under color of State law.
38. Defendants New York City and NYPD are recipients of federal funding for the purpose of providing for the public safety
39. Defendants, jointly and/or severally, individually and/or collectively did permit and effect the policy and policies, action

and actions complained of hereinafter that caused Plaintiff constitutional injury and deprivation of constitutional rights and guarantees.

FACTS COMMON TO ALL CAUSES OF ACTION

THE ARREST OF RAFFIQUE N. KHAN

40. On Sunday November 26, 2023 Plaintiff Raffique N. Khan (“Khan” or “SSGT Khan”) was attending a small private function commemorating what would have been his mother’s 70th Birthday on November 24th. His mother had just recently passed away.
41. SSGT Khan, his cousin, and a friend took some food from the function and sat in SSGT Khan’s car to eat and talk catching up on happenings since they last were together.
42. About 0315 while the three men were still talking in the 2022 BMW Series 3 owned by Plaintiff Raffique N. Khan bearing Purple Heart license plates, an unmarked Police Car drove past, slowed down, then drove on.
43. After sitting in his car for a while longer, SSGT Khan drove off with his cousin and friend toward his home in St Albans, Queens.
44. After SSGT Khan had been driving for a short time, he was stopped by the same unmarked police car he had observed earlier.
45. The officers never identified themselves to Plaintiff Raffique N. Khan and they were not in uniform.
46. Plaintiff Raffique N. Khan told Defendant NYPD Officer Matthew S. Bessen that he had a weapon in the glovebox and the permits and licenses were in the sun visor of the car.
47. Plaintiff Raffique N. Khan always keeps his driver’s license, insurance proof, registration, and Concealed Carry Handgun

permit in the sun visor so that in the event he is stopped by police he can keep both hands on the wheel and not have to reach for anything.

48. Without any explanation for the traffic stop or any other explanation Defendant NYPD Officer Matthew S. Bessen told Plaintiff Raffique N. Khan to, “Step out of the vehicle.”
49. Defendant NYPD Officer Matthew S. Bessen ordered Plaintiff Raffique N. Khan and his passengers to go the rear of the vehicle and then the officers started searching SSGT Khan’s without asking permission, providing any explanation, and without any probable cause.
50. After approximately 30 minutes of searching, Defendant NYPD Officer Matthew S. Bessen and other officers handcuffed Plaintiff Raffique N. Khan his cousin, and his friend.
51. Defendant NYPD Officer Matthew S. Bessen looked at the Retired Military Identification of SSGT Khan and his Concealed Weapons Carry License and asked, “How did you get these?” but he was not interested in the answer provided by Plaintiff Raffique N. Khan.
52. At no time during the traffic stop did Defendant NYPD Officer MATTHEW S. BESSEN ever provide Plaintiff Raffique N. Khan with a *Miranda* warning.
53. At no time from the traffic stop until Plaintiff Raffique N. Khan was imprisoned in a holding cell did anyone associated with the Defendant NYPD ever state what charges were being lodged against SSGT Khan.
54. Defendant NYPD Officer MATTHEW S. BESSEN and the other officers at the scene of the traffic stop placed Plaintiff Raffique N.

Khan, his cousin, and his friend in separate cars and transported them all to the 75th Precinct Station house.

PROCESSING AND IMPRISONMENT OF RAFFIQUE N. KHAN

55. Eventually, NYPD Officer(s) fingerprinted SSGT Khan, his cousin, and his friend, took their personal belongings, and imprisoned them in a “holding” cell.
56. After being imprisoned in the holding cell for approximately four hours, NYPD Officers released the cousin and friend of SSGT Khan.
57. After being imprisoned in the holding cell for approximately eight (8) hours, Plaintiff Raffique N. Khan asked to make a telephone call but was told by a NYPD Officer that only the arresting officer could let him use the phone.
58. After being imprisoned in the holding cell for approximately twelve (12) hours, the arresting officer came back and told Plaintiff Raffique N. Khan he could use the phone after the detectives come in and questioned him. SSGT Khan again asked the Officer what the charges were, but they never told him.
59. Plaintiff Raffique N. Khan asked for a lawyer and none was ever provided. Neither was SSGT Khan allowed to make a phone call.
60. Eventually, hours later, an NYPD Officer told Plaintiff Raffique N. Khan he was being taken to Central Booking in Brooklyn.
61. After Plaintiff Raffique N. Khan arrived at Central Booking, he was photographed and processed, but was never informed of the charges against him, nor was he allowed to make a phone call.

62. After being imprisoned for more than twenty-four (24) hours, Plaintiff SSGT Khan was told by a guard that the Courts were now closed and SSGT Khan would see a Judge in the morning.

PROSECUTION OF RAFFIQUE N. KHAN

63. At approximately 0800 the next day, a public defender met with SSGT Khan and finally told him what the charges against him were.
64. SSGT Khan was told that the Assistant District Attorney (“ADA”) was requesting \$50,000 cash bail and \$100,000 in assets.
65. Plaintiff Raffique N. Khan was finally arraigned at 1500 on Monday, November 27, 2023 yet the ADA was still seeking bail.
66. When the public defender present that hour to represent SSGT Khan presented a copy of SSGT Khan’s Concealed Carry Handgun License, the arraignment judge released Plaintiff SSGT Khan without bond to return on Friday, December 1, 2024.
67. At the time of his release by the Court, Plaintiff Raffique N. Khan had been imprisoned and held incommunicado for over thirty-four (34) Hours from the time of his arrest.
68. During the time that Plaintiff Raffique N. Khan was being imprisoned and held incommunicado he was unable to communicate with his teenage children alone in his home in Queens or with his federal government employer.
69. During the time that Plaintiff Raffique N. Khan was being imprisoned and held incommunicado he was actually marked AWOL (absent without leave) from his federal job.

SEIZURE OF FIREARMS FROM RAFFIQUE N. KHAN

70. During the time that Defendant NYPD withheld the wrongfully and illegally seized government issued cellphone and federal identification of Plaintiff SSGT Khan, he was unable to gain access to his job site at Ft. Wadsworth and was forced to notify his federal chain of command of his arrest and seizure of his firearm.
71. On Monday, November 27, 2023, Plaintiff Raffique N. Khan called the NYPD licensing Division and was advised to turn in my Resident Firearm, a Smith & Wesson MP9 Model NML8334 to the local police station of the 113 Precinct for safe keeping. He did. (**Exhibit 10**. Safe Keeping invoice)

EFFORTS BY RAFFIQUE N. KHAN TO RECOVER HIS PROPERTY

72. On November 27, 2023, Plaintiff Raffique N. Khan returned to the 75th Precinct (NYPD) to recover his personal property which had been seized on his arrest. SSGT Khan was unable to retrieve his personal belongings at that time.
73. On November 28, 2023, Plaintiff Raffique N. Khan returned to the 75th Precinct but was told to come back at a specific time which he did. However, the Officer in charge was not there.
74. On November 29, 2024, Plaintiff Raffique N. Khan again went to the 75th Precinct and was told to by NYPD go to 11 Front Street.
75. As instructed, Plaintiff Raffique N. Khan tried to obtain his personal belongings from the NYPD facility at 11 Front St. but he was told that his belongings were still at the 75th Precinct police station.
76. Returning to the 75th Precinct police station, Plaintiff Raffique N. Khan was finally able to retrieve his chain, bracelet and other jewelry but was unable to recover his car, his personal cell phone,

his government cell phone, his Government Work identification, his cash and other personal property.

77. Plaintiff Raffique N. Khan returned several times to the Defendant NYPD 75th Precinct police station but each time he was told he had to come back when the arresting officer was there.
78. Finally, the public defender assigned to represent Plaintiff Raffique N. Khan intervened and SSGT Khan was able to retrieve most of his personal belongings on December 1, 2023. However, his personal cell phone was missing.
79. Plaintiff Raffique N. Khan eventually recovered the cash that had been seized from him but his cell phone was not released to him until January 11, 2024.
80. In Court on December 1, 2023, the ADA requested more time to verify that Plaintiff Raffique N. Khan had an active Concealed Carry Handgun permit and the criminal case against Plaintiff Raffique N. Khan was continued to February 24, 2024.
81. On the evening of February 23, 2023, Plaintiff Raffique N. Khan received an electronic mailing from the ADA advising him that the case was dismissed, and all criminal charges were dropped.

THE QUEST BY RAFFIQUE N. KHAN TO RECOVER HIS FIREARMS

82. After dismissal of all the criminal charges against Plaintiff Raffique N. Khan began a quest to recover the weapon which the NYPD had illegally seized and still maintain to date.
83. In the quest to recover his weapon, Plaintiff Raffique N. Khan first contacted the Defendant NYPD on February 26, 2024 after he had obtained a copy of the certificate of disposition at which time an “investigating” officer told him to write a “statement.” He did as he was told but never received a response from Defendant NYPD.

84. Plaintiff Raffique N. Khan returned to the Defendant NYPD 75th Precinct police station on March 8, 2024 with the disposition stating all criminal charges were dropped but Defendants told him that the ADA had to send a release for the weapon.
85. In the quest to recover his weapon, Plaintiff Raffique N. Khan was told by Defendant NYPD Officers that they had received the release and he was directed to go to 11 Front St. to pick up his weapon. At 11 Front Street, SSGT Khan was told that even though the ADA (Kings County) released the weapon Defendant NYPD had to complete an investigation by the licensing division.
86. On March 11, 2024, attorney Cory H. Morris wrote to a number of NYPD agencies (**EXHIBIT 11**. Letter to NYPD) publicly identified as dealing with firearms requesting return of the firearms seized from Plaintiff Raffique N. Khan. Attached to that letter and submitted with it were a Litigation Hold Notice, and a number of documents some of which are attached to this Complaint and all of which clearly indicate that seizing the weapons owned by SSGT Khan was unlawful and indicating that SSGT Khan had a valid New York City Concealed Carry Handgun License at the time of his arrest which was still valid and in full force and effect.
87. At the time of filing this Complaint, March 25, 2024, the Defendant NYPD still has not returned the weapon they had illegally seized from Plaintiff Raffique N. Khan.

THE EMAIL EXCHANGES (EXHIBIT 12.)

88. On February 23, 2024 Plaintiff Raffique N. Khan was advised by email from the Kings County Supreme Court Criminal Term that the case against him had been “dismissed and sealed” on the representation by the People, “that the defendant is a federal

officer working on an Army base and has active carry and conceal permits.”

89. On February 27, 2024, Plaintiff Raffique N. Khan wrote to Defendant NYPD Officer Astarita that the criminal charges against were dismissed, attaching proof thereof.
90. On March 6, 2024, Defendant NYPD Officer Astarita replied, “Received, thank you.”
91. On March 8, 2024, Plaintiff Raffique N. Khan emailed Defendant NYPD Officer Astarita requesting authorization for release of his firearms.
92. On March 13, 2024, Plaintiff Raffique N. Khan again emailed Defendant NYPD Officer Astarita requesting authorization for release of his firearms.
93. Finally, on March 14, 2024, Defendant NYPD Officer Astarita replied by email stating,

“Maybe you are not aware of the process regarding your incident. While I have received your recently delivered documents, that does not mean you get your firearms back right away. Your incident is in investigation. When I finish my investigation, it will then be sent to numerous supervisors who will then make a determination. At that time, you will be notified by mail and directed to call for a release and license, if your license is continued. In the meantime, be patient as I hope to have your case completed by midweek next week and then sent on to the supervisors.”

FEDERAL CAUSES OF ACTION

94. Plaintiff Raffique N. Khan asserts violations of his Second, Fourth, Fifth, Eighth and Fourteenth Amendment rights guaranteed him under the Constitution of the United States.

**FIRST CAUSE OF ACTION: 42 U.S.C. § 1981
PROSECUTION DUE TO RACE/COLOR/NATIONAL ORIGIN**

95. Defendants, jointly and/or severally, individually and/or collectively, have violated the rights of Plaintiff Raffique N. Khan, a man of color who was born in Trinidad-Tobago and became an American citizen by virtue of his distinguished military service in the United States Army.
96. 42 USC § 1981 provides

All persons within the jurisdiction of the United States shall have the same right in every State and Territory ... to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.
97. During the early morning of November 26, 2023, Plaintiff Raffique N. Khan was lawfully operating his 2022 BMW Series 3 sedan with clearly displayed front and rear license plates bearing the number PH Khan19 indicating that the owner of the vehicle was a veteran of United States military service who had earned a Purple Heart as a result of wounds incurred during service.
98. At the intersection of Newport St. and Chestnut St. Brooklyn within the jurisdiction of the Defendant NYPD 75th Precinct, Plaintiff Raffique N. Khan was stopped by an unmarked vehicle operated by Defendant NYPD Officer Matthew S. Bessen in plain clothes. There was at least one other individual in plain clothes in the unmarked vehicle.
99. There was no probable cause to stop Plaintiff Raffique N. Khan other than he was a person of color operating an expensive late

model motor vehicle along a public roadway in an area patrolled by officers of the NYPD 75th Precinct in Brooklyn.

100. At the time of the traffic stop Plaintiff Raffique N. Khan was not charged with any violation of the Vehicle & Traffic Law, nor has he ever been charged with a violation of the Vehicle & Traffic Law at the time and place of that stop.
101. There was no probable cause for the unjustified traffic stop of Plaintiff Raffique N. Khan other than he was a person of color operating an expensive late model automobile on the public streets patrolled by officers working out of the NYPD 75th Precinct.
102. Defendants, individually and collectively, through their agent did stop, seize, interrogate and arrest Plaintiff SSGT Khan on the basis of his race, color and/or national origin.
103. Defendants, individually and collectively, through their agent did deprive Plaintiff of equal protection on the basis of color/national origin/race in the stop, seizure and evisceration of his ability to maintain a concealed carry permit, a firearm(s), as white persons.

**SECOND CAUSE OF ACTION: 42 U.S.C. § 1983
DENIAL OF SECOND AMENDMENT RIGHTS**

SEIZURE OF FIREARMS

104. That the acts and conduct of the Defendants, jointly and/or severally, individually and/or collectively, in seizing a firearm for which Plaintiff Raffique N. Khan held a valid and current New York City Concealed Carry Handgun License (**Exhibit 5(b)**, herein), interfered with and effectively denied Plaintiff his rights guaranteed under the Second Amendment.

105. That the Second Amendment Constitutional rights of Plaintiff Raffique N. Khan were and are being denied him as a result of the Defendants, jointly and/or severally, individually and/or collectively, ignoring the fact that at the time of arrest Plaintiff Raffique N. Khan held a valid Concealed Carry Handgun License that was displayed on the windshield sun visor of his vehicle.
106. As a direct and proximate result of the actions of the Defendants, jointly and/or severally, individually and/or collectively, Plaintiff Raffique N. Khan has sustained and continues to sustain injury and damages including but not limited to, loss of his firearm and he has been caused to and suffered shock, embarrassment, anxiety and fear of unjust police action, which can only be justly compensated by an award of money damages in an amount to be determined by the trier of facts upon a trial of this action.

REFUSAL TO RETURN SEIZED FIREARMS

107. Defendants, jointly and/or severally, individually and/or collectively, have violated the property rights of Plaintiff Raffique N. Khan guaranteed to him under the Fifth and Fourteenth Amendments to the Constitution of the United States.
108. The pretext of SSGT Khan's arrest is over, the pretext of his prosecution eliminated yet the violation of his rights continues.
109. Defendants, jointly and/or severally, individually and/or collectively, have created and are maintaining a policy and practice which began a century ago with the "Sullivan" Act to deny licenses to carry firearms to people of color and racial; and ethnic minorities in violation of the rights guaranteed to all citizens by the Second Amendment to the Constitution of the United States.

110. The continued existence of this policy and practice within New York City executed and enforced by the NYPD is clearly demonstrated in the treatment of Plaintiff Raffique N. Khan with respect to the obstacles interposed by the NYPD to his efforts to recover his handgun which had been wrongfully seized during an illegal arrest following a racially motivated improper traffic stop.
111. That the acts and conduct of the Defendants, jointly and/or severally, individually and/or collectively, in refusing to return a wrongfully seized firearm for which Plaintiff Raffique N. Khan held a valid and current New York City Concealed Carry Handgun License (**Exhibit 5(b)** herein), interfered with and effectively denied Plaintiff his rights guaranteed under the Second Amendment.
112. As a direct and proximate result of the actions of the Defendants, jointly and/or severally, individually and/or collectively, Plaintiff Raffique N. Khan has sustained and continues to sustain injury and damages including but not limited to, loss of his firearm and he has been caused to and suffered shock, embarrassment, anxiety and fear of unjust police action, specifically that of depriving black persons of firearms, which can only be justly compensated by money damages in an amount to be determined by the trier of facts upon a trial of this action.
113. As a result of the violation of the rights of Plaintiff Raffique N. guaranteed under the Second Amendment by Defendants, jointly and/or severally, individually and/or collectively, Plaintiff seeks to recover compensatory damages from the Defendants, jointly and/or severally, individually and/or collectively, in an

amount to be determined by the trier of facts upon a trial of this action.

114. As a result of the violation of SSGT Khan's rights guaranteed under state and federal constitution by Defendants, jointly and/or severally, individually and/or collectively, Plaintiff seeks to recover punitive damages from the Defendants, jointly and/or severally, individually and/or collectively, in an amount to be determined by the trier of facts upon a trial of this action.

THIRD CAUSE OF ACTION: 42 U.S.C. § 1983
MONELL CONSIDERATIONS; MUNICIPAL LIABILITY

115. The violations of the civil rights of Plaintiff Raffique N. Khan were the result of and/or caused by the negligent hiring, training, retention, and supervision, acts of negligence, failure to train, recklessness and intentional acts of Defendants New York City and NYPD, their agents, employees, and contractors.
116. Starting with the initial baseless traffic stop of a gentleman of color driving a relatively new BMW through Brooklyn in the domain of the NYPD 75th Precinct, and then the pretextual arrest for possession of a handgun when the Concealed Carry License was visible on the windshield sun visor; followed by the indignity of booking, imprisonment, and arraignment, only to have the case summarily dismissed with the charges withdrawn, Plaintiff Raffique N. Khan was clearly a victim of long standing policy and practices of the Defendant NYPD since the command and management of the NYPD 75th Precinct were fully aware that SSGT Khan was a wounded American combat veteran with a Bronze Star for Valor and a Purple Heart.
117. The initial baseless traffic stop of a gentleman of color driving a relatively new BMW through Brooklyn is a manifestation of a

long-standing policy by elements of the NYPD to take actions which violate the spirit and intent of the United States Constitution.

118. As a consequence of Defendants' wrongful actions, Plaintiff Raffique N. Khan was deprived of his freedom, and suffered shock, personal humiliation, degradation, embarrassment, anxiety, fear of unjust and discriminatory police action, which can only be justly compensated by an award of money damages in an amount to be determined by the trier of facts upon a trial of this action.
119. Defendants, individually and collectively, maintain a practice, custom, trade, usage, policy, custom and/or practice of stopping minority persons unlawfully, disarming persons (inclusive of minorities) knowing or having reason to know that their firearm ownership is lawful if not the policy of forcibly removing firearms from black/minority persons on the basis of their color, race and/or national origin.
120. Defendants, individually and collectively, arrest, seize and refuse to comply with the United States Constitution, Second Amendment, allowance of legal firearm ownership.
121. The shock, personal humiliation, degradation, embarrassment, anxiety, fear of unjust and discriminatory police action, suffered by Plaintiff Raffique N. Khan as a result of Defendants, jointly and/or severally, individually and/or collectively, deliberately violating Plaintiff's Constitutional and civil rights calls for an award of punitive damages in an amount to be determined by the trier of facts upon a trial of this action all together with costs and attorneys' fees.

**FOURTH CAUSE OF ACTION: 42 U.S.C. § 1983
FALSE ARREST AND FALSE IMPRISONMENT**

122. The serious charges filed against Plaintiff Raffique N. Khan in the Criminal Court of the City of New York alleging he committed the crimes of violating PL 265.03(3) Criminal possession of a weapon in the second degree (DQO), PL 265.01-B(1) Criminal possession of a firearm (DQO); PL 265.01 (1) Criminal possession of a weapon in the fourth degree; and AC 10-131(I) (3) Possession of pistol ammunition were patently false and known to be false at the time they were sworn to and filed by Defendant NYPD Officer MATTHEW S. BESSEN. (**EXHIBIT 9**. Criminal Complaint)
123. The accusations of wrongful actions leveled against Plaintiff, Raffique N. Khan, were false and known or could have been known to Defendant NYPD Officer MATTHEW S. BESSEN, Shield No 14934, at the time he signed the Criminal Complaint and/or Information.
124. The criminal charges prosecuted against Plaintiff Raffique N. Khan were made by Defendant NYPD Officer MATTHEW S. BESSEN for an improper purpose: to cover up the lack of probable cause for the arrest of Plaintiff Raffique N. Khan.
125. The arrest and physical restraint of Plaintiff Raffique N. Khan were without probable cause or legitimate reason therefore constituted a violation of Plaintiff's rights, secured by the Fourth Amendment to the United States Constitution, to be free from unreasonable searches and seizures.
126. As a consequence of Defendants' wrongful actions, Plaintiff Raffique N. Khan was deprived of his freedom, and suffered shock, embarrassment, anxiety and fear of unjust police action, which can only be justly compensated by an award of money

damages in an amount to be determined by the trier of facts upon a trial of this action.

127. The suffered shock, embarrassment, anxiety and fear of unjust police action, which can only be justly compensated by an award of money damages in an amount to be determined by the trier of facts upon a trial of this action suffered by Plaintiff Raffique N. Khan as a result of Defendants, jointly and/or severally, individually and/or collectively, deliberately violating Plaintiff's Constitutional and civil rights calls for an award of punitive damages in an amount to be determined by the trier of facts upon a trial of this action all together with costs and attorneys' fees.

**FIFTH CAUSE OF ACTION: 42 U.S.C. § 1983 and
NEW YORK LAW — ABUSE OF PROCESS**

128. Defendants, jointly and/or severally, individually and/or collectively, acting under color of state law, have engaged in actions and abuses which have deprived Plaintiff Raffique N. Khan of rights, privileges and immunities secured by the Constitution of the United States, in violation of 42 U.S.C. § 1983, constituting a conspiracy.
129. Abuse of process is evidenced by Defendants prolonged imprisonment of the Plaintiff Raffique N. Khan, confiscation of his weapon for which he had a lawful and current New York City Concealed Carry Handgun License, initiation of criminal process, and prosecution of the Plaintiff.
130. Defendants, jointly and/or severally, individually and/or collectively, did violate the rights of the Plaintiff Raffique N. Khan guaranteed to him under Constitution of the United States by initiating an improper bias motivated traffic stop, then subsequently causing SSGT Khan to be arrested, processed,

imprisoned. and criminally charged with false crimes by Defendant NYPD Officer Matthew S. Bessen acting in accordance with practices and policies fostered and condoned by the NYPD.

131. The unlawful NYPD policy maintained and enforced by the Defendants, individually and collectively, deprived Plaintiff of rights guaranteed by the Second Amendment.
132. Defendants, jointly and/or severally, individually and/or collectively, had a duty to conduct a prompt, full and fair investigation of the incident surrounding the bias-motivated traffic stop of Plaintiff, Raffique N. Khan, his false arrest, false imprisonment, and prosecution, yet no such investigation was ever initiated much less conducted.
133. Defendants had a duty to not arrest persons for exercising their rights guaranteed under the Second Amendment.
134. Failure to conduct such an investigation into the circumstances of the mistreatment of Plaintiff Raffique N. Khan evidenced malice, gross recklessness, intention and/or indifference without excuse or justification in violation of 42 U.S.C. § 1983.
135. As a direct and proximate result of NYPD actions, Plaintiff Raffique N. Khan suffered shock, embarrassment, anxiety and fear of unjust police action, which can only be justly compensated by an award of money damages in an amount to be determined by the trier of facts upon a trial of this action, as well as punitive damages, costs and attorney's fees.

**SIXTH CAUSE OF ACTION:
42 U.S.C. §§ 1985, 1986 — CONSPIRACY**

136. Defendants, jointly and/or severally, individually and/or collectively, did intend and conspire to deprive Plaintiff Raffique

N. Khan of his Constitutional rights, and caused such deprivation of rights by acting in concert to unlawfully arrest, falsely imprison, and criminally prosecute SSGT Khan.

137. Defendants, jointly and/or severally, individually and/or collectively, did intend and conspire to deprive Plaintiff Raffique N. Khan of his Constitutional rights by acting in concert to unlawfully arrest, falsely imprison, and criminally prosecute Plaintiff according to a well-established pattern, practice, widespread custom and/or policy of long standing duration in the NYPD.
138. Defendants, jointly and/or severally, individually and/or collectively, failed to train those involved in reporting, intervening, punishing and/or prosecuting violations of constitutional rights such as those which occurred with Plaintiff Raffique N. Khan.
139. Defendants actions were motivated by race, color and/or national origin – stopping SSGT Khan on this basis – and continued in the longstanding legacy since ruled unconstitutional by the United States Supreme Court – removing firearm ownership from New York persons so unfortunate to be black or minority and on the basis of race, color and/or national origin.
140. The Sullivan Act, over one hundred years old, was a pretext to ensure that black/African American persons, freed slaves in some instance, from owning and exercising the Second Amendment right to protect themselves and others during the Jim Crow era.
141. Defendants, jointly and/or severally, individually and/or collectively, engaged in a pattern, practice, widespread custom, usage and/or policy of charging and prosecuting persons who were victims of improper or illegal traffic stops as stated.

142. As a consequence of Defendants' wrongful actions, individually and collectively, Plaintiff Raffique N. Khan was deprived of his freedom, and suffered shock, embarrassment, anxiety and fear of unjust police action, which can only be justly compensated by an award of money damages in an amount to be determined by the trier of facts upon a trial of this action.
143. The evisceration of constitutional rights occasioned by unjust police action on the basis of race, color and/or national suffered by Plaintiff Raffique N. Khan as a result of Defendants, jointly and/or severally, individually and/or collectively, deliberately violating Plaintiff's constitutional and civil rights calls for an award of punitive damages in an amount to be determined by the trier of facts together with costs and attorneys' fees.

**SEVENTH CAUSE OF ACTION:
MALICIOUS PROSECUTION**

144. Defendants, jointly and/or severally, individually and/or collectively, lacked reasonable suspicion to stop and detain Plaintiff and further lacked probable cause for making the initial traffic stop of Plaintiff Raffique N. Khan, nor any probable cause to arrest him, process, imprison, and prosecute him.
145. Immediately upon the unfounded and improper initial bias-based traffic stop of Plaintiff Raffique N. Khan, Defendant NYPD Officer MATTHEW S. BESSEN knew or had reason to know that Plaintiff Raffique N. Khan had a valid and current New York City Concealed Carry License and there was no probable cause to arrest Plaintiff and, therefore, such arrest was illegal and in violation of Plaintiff's Constitutional rights.
146. Defendants, jointly and/or severally, individually and/or collectively, violated Plaintiff's Constitutional right to be free from

illegal arrest, illegal confinement and/or illegal seizure of property.

147. The subsequent malicious prosecution of Plaintiff Raffique N. Khan following his wrongful arrest, which was conducted by Defendants with knowledge that Plaintiff had been subject to an improper, illegal bias-based traffic stop then wrongfully arrested, was wrongfully pursued by Defendants, jointly and/or severally, individually and/or collectively, under color of law, customs, usages and/or statutes of the State of New York.
148. Under color of law, Defendants, jointly and/or severally, individually and/or collectively, deprived Plaintiff Raffique N. Khan of his Constitutional right to protection from unlawful search and seizure by falsely charging him criminally and then prosecuting him without any substantial credible evidence to support the allegations of the criminal complaint.
149. The criminal prosecution of Plaintiff was summarily dismissed on arraignment.
150. As a consequence of Defendants' wrongful actions, Plaintiff Raffique N. Khan was deprived of his freedom, and suffered shock, embarrassment, anxiety and fear of unjust police action, which can only be justly compensated by an award of money damages in an amount to be determined by the trier of facts upon a trial of this action.
151. The shock, embarrassment, anxiety and fear of unjust police action suffered by Plaintiff Raffique N. Khan as a result of Defendants, jointly and/or severally, individually and/or collectively, deliberately violating Plaintiff's Constitutional and civil rights calls for an award of punitive damages in an amount to

be determined by the trier of facts upon a trial of this action all together with costs and attorneys' fees.

**EIGHTH CAUSE OF ACTION:
APPOINTMENT OF A MONITOR**

152. Defendants, jointly and/or severally, individually and/or collectively, acting under color of state law, have engaged in actions and abuses which have deprived Plaintiff Raffique N. Khan of rights, privileges and immunities secured by the Constitution of the United States, in violation of 42 U.S.C. § 1983, constituting a conspiracy.
153. Abuse of process is evidenced by Defendants prolonged imprisonment of the Plaintiff Raffique N. Khan, confiscation of his firearm for which he had a lawful and current New York City Concealed Carry Handgun License, initiation of criminal process, and prosecution of the Plaintiff.
154. Defendants, jointly and/or severally, individually and/or collectively, did violate the rights of the Plaintiff Raffique N. Khan guaranteed to him under Constitution of the United States by initiating an improper bias motivated traffic stop, then subsequently causing SSGT Khan to be arrested, processed, imprisoned. and criminally charged with false crimes by Defendant NYPD Officer MATTHEW S. BESSEN acting in accordance with practices and policies fostered and condoned by the NYPD.
155. Defendants, jointly and/or severally, individually and/or collectively, had a duty to conduct a prompt, full and fair investigation of the incident surrounding the bias-motivated traffic stop of Plaintiff, Raffique N. Khan, his false arrest, false

imprisonment, and prosecution, yet no such investigation was ever initiated much less conducted.

156. Failure to conduct such an investigation into the circumstances of the mistreatment of Plaintiff Raffique N. Khan evidenced malice, gross recklessness, intention and/or indifference without excuse or justification in violation of 42 U.S.C. § 1983.
157. The treatment of Plaintiff Raffique N. Khan exemplifies a long standing policy and practice of the NYPD particularly with respect to bias-based traffic stops without probable cause and the failure to properly investigate complaints concerning such stops and other violations of Constitutional rights of motorists following such illegal bias (race/color/national origin) based stops.
158. Defendants, jointly and/or severally, individually and/or collectively, intentionally violated and continue to violate Plaintiff's Constitutional rights, Plaintiff Raffique N. Khan seeks appointment of a Special Federal Court Monitor to oversee all d actions by Defendant New York City and Defendant NYPD which deny or interfere with the Second Amendment rights of the Plaintiff and others who might be so unfortunate as to be similarly affected by (facially neutral but) discriminatory policies even after the Supreme Court of the United States decision in *N.Y.S. Rifle and Pistol Assoc. vs. Bruen et al.* decided on June 23, 2022.
159. Without the appointment of a Special Federal Court Monitor, Defendants, jointly and/or severally, individually and/or collectively, will continue to apply and enforce the unconstitutional policies and practices complained of in this Complaint by the Plaintiff Raffique N. Khan.
160. Defendants, together, show by its prosecution of SSGT Khan that federal oversight is necessary to respect the Second Amendment.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Raffique N. Khan demands judgment against the Defendants, jointly and/or severally, individually and/or collectively, as follows:

AGAINST the Defendants, jointly and/or severally, individually and/or collectively, on the applicable State and Federal Causes of Action pursuant to 42 U.S.C. Section 1983, compensatory damages in an amount to be determined by the triers of fact;

AGAINST the Defendants, jointly and/or severally, individually and/or collectively, on the Federal Causes of Action, punitive damages, where appropriate and allowed, in an amount to be determined by the triers of fact;

APPOINTMENT of a Special Federal Court Monitor to review the nature of traffic stops by Defendant NYPD police officers in Eastern Brooklyn of people of color (race/national origin) driving on public thoroughways and the subsequent treatment of those individuals;

DECLARATIVE AND INJUNCTIVE RELIEF necessary to enforce Defendants, individually and collectively, to comply with the United States Constitution, Second Amendment, and the property rights of persons within the Eastern District of New York;

AN AWARD of attorney's fees pursuant to 42 U.S.C. § 1988 together with the costs of disbursements in this action.

all together with such other and further relief as this Court shall believe is just and proper under the circumstances.

DATED AT: Central Islip, NY
March 25, 2024

/S/ *Cory H. Morris*

Cory H. Morris, Esq. (CM 5225)
THE LAW OFFICES OF CORY H. MORRIS

Attorneys for Plaintiff

863 Islip Avenue

Central Islip, NY 11722

Phone: (631) 450-2515

FAX: (631) 223-7377

Email: info@coryhmorris.com

Victor John Yannacone, jr, Esq., (VY6405)

of counsel

Email: vyannacone@yannalaw.com

EXHIBITS ATTACHED AND SUBMITTED HEREWITH

EXHIBIT 1, DD-214

EXHIBIT 2. Bronze Star citation

EXHIBIT 3. Purple Heart citation

EXHIBIT 4. Veterinary Service News, May 2013

EXHIBIT 5(a). Restricted Handgun License

EXHIBIT 5(b). Concealed Carry Handgun License

EXHIBIT 5©. Handgun Purchase Authorization

EXHIBIT 6. Handgun invoice

EXHIBIT 7. Certificate

EXHIBIT 8. USOPM Form 50

EXHIBIT 9. Criminal Complaint

EXHIBIT 10. Safe Keeping invoice

EXHIBIT 11. Cory H. Morris letter

EXHIBIT 12. Email exchange

CERTIFICATE OF RELEASE OR DISCHARGE FROM ACTIVE DUTY

This Report Contains Information Subject to the Privacy Act of 1974, As Amended.

1. NAME (Last, First, Middle) KHAN, RAFFIQUE		2. DEPARTMENT, COMPONENT AND BRANCH ARMY/RA		3. SOCIAL SECURITY NUMBER 059 94 9188	
4a. GRADE, RATE OR RANK SSG		b. PAY GRADE E06		5. DATE OF BIRTH (YYYYMMDD) 19831219	
6. RESERVE OBLIGATION TERMINATION DATE (YYYYMMDD) 00000000		7a. PLACE OF ENTRY INTO ACTIVE DUTY BROOKLYN, NEW YORK			
b. HOME OF RECORD AT TIME OF ENTRY (City and state, or complete address if known) 77 SULLIVAN PL APT 3D BROOKLYN NEW YORK 11225-0000		8a. LAST DUTY ASSIGNMENT AND MAJOR COMMAND WT CO B WARRIORS BELVOIR MC			
b. STATION WHERE SEPARATED PORT BELVOIR TC, VA 22060-5224		9. COMMAND TO WHICH TRANSFERRED USAR CON GP (RET) 1600 SPEARHEAD DIVISION AVE, FT KNOX, KY 40122			
10. SGLI COVERAGE AMOUNT: \$ 300,000.00		11. PRIMARY SPECIALTY (List number, title and years and months in specialty. List additional specialty numbers and titles involving periods of one or more years.) 6AR30 2B VETERINARY FOOD INSP - 6 YRS 6 MOS//NOTHING FOLLOWS			
12. RECORD OF SERVICE		YEAR(S)		MONTH(S)	
a. DATE ENTERED AD THIS PERIOD		2008		07 23	
b. SEPARATION DATE THIS PERIOD		2015		09 23	
c. NET ACTIVE SERVICE THIS PERIOD		0007		02 01	
d. TOTAL PRIOR ACTIVE SERVICE		0000		00 00	
e. TOTAL PRIOR INACTIVE SERVICE		0000		00 00	
f. FOREIGN SERVICE		0003		00 12	
g. SEA SERVICE		0000		00 00	
h. INITIAL ENTRY TRAINING		0000		00 00	
i. EFFECTIVE DATE OF PAY GRADE		2013		04 01	
13. DECORATIONS, MEDALS, BADGES, CITATIONS AND CAMPAIGN RIBBONS AWARDED OR AUTHORIZED (All periods of service) AFGHANISTAN CAMPAIGN MEDAL W/ CAMPAIGN STAR //BRONZE STAR MEDAL W/ V DEVICE//PURPLE HEART//MERITORIOUS SERVICE MEDAL//ARMY COMMENDATION MEDAL (2ND AWARD)//ARMY ACHIEVEMENT MEDAL (2ND AWARD)//ARMY GOOD CONDUCT MEDAL (2ND AWARD)//NATIONAL DEFENSE SERVICE MEDAL//GLOBAL WAR//CONT IN BLOCK 18		14. MILITARY EDUCATION (Course title, number of weeks, and month and year completed) AIR ASSAULT, 2 WEEKS, 2013//BASIC NCO CRS (BNCOC), 4 WEEKS, 2014//CMD LANG PRG GE HDSTRT, 2 WEEKS, 2009//COMBAT LIFE SAVERS CRS, 1 WEEK, 2011//COMBATIVES LEVEL 1, 1 WEEK, 2012//FIELD SAN TEAM - INDIV, 1 WEEK, 2011//FIELD SAN TEAM CERT, 1 WEEK, 2012//FOOD INSP TECH (BASIC), 9//CONT IN BLOCK 18			
15a. COMMISSIONED THROUGH SERVICE ACADEMY				YES X NO	
b. COMMISSIONED THROUGH ROTC SCHOLARSHIP (10 USC Sec. 2107b)				YES X NO	
c. ENLISTED UNDER LOAN REPAYMENT PROGRAM (10 USC Chap. 109) (If Yes, years of commitment: NA)				YES X NO	
16. DAYS ACCRUED LEAVE PAID 0		17. MEMBER WAS PROVIDED COMPLETE DENTAL EXAMINATION AND ALL APPROPRIATE DENTAL SERVICES AND TREATMENT WITHIN 90 DAYS PRIOR TO SEPARATION		YES NO X	
18. REMARKS BLOCK 6, PERIOD OF DELAYED ENTRY PROGRAM: 20080412-20080722//SERVED IN A DESIGNATED IMMINENT DANGER PAY AREA//SERVICE IN AFGHANISTAN 20120116-20130114//MEMBER HAS COMPLETED FIRST PULL TERM OF SERVICE//SOLDIER ISSUED RETIREMENT CERTIFICATES, U.S. FLAG AND ARMY LAPEL PIN //CONT FROM BLOCK 13: ON TERRORISM SERVICE MEDAL//NON COMMISSIONED OFFICER PROFESSIONAL DEVELOPMENT RIBBON//ARMY SERVICE RIBBON//OVERSEAS SERVICE RIBBON (2ND AWARD)//NATO MEDAL//COMBAT ACTION BADGE//AIR ASSAULT BADGE//CONT FROM BLOCK 14: WEEKS, 2009//INSTL FOOD VULNERABLE, 1 WEEK, 2014//TECH TRNS OF//SEE ATTACHED CONTINUATION SHEET The information contained herein is subject to computer matching within the Department of Defense or with any other affected Federal or non-Federal agency for verification purposes and to determine eligibility for, and/or continued compliance with, the requirements of a Federal benefit program.					
19a. MAILING ADDRESS AFTER SEPARATION (Include ZIP Code) 111-37 179TH STREET ADDISLEIGH PARK NEW YORK 11433		b. NEAREST RELATIVE (Name and address - include ZIP Code) CHANDAI MORGAN-KHAN 111-37 179TH STREET ADDISLEIGH PARK NEW YORK 11433			
20. MEMBER REQUESTS COPY 6 BE SENT TO (Specify state/facility) NY OFFICE OF VETERANS AFFAIRS		X		YES NO	
a. MEMBER REQUESTS COPY 3 BE SENT TO THE CENTRAL OFFICE OF THE DEPARTMENT OF VETERANS AFFAIRS (WASHINGTON, DC)		X		YES NO	
21a. MEMBER SIGNATURE ESIGNED BY: KHAN, RAFFIQUE, NISHAN, 136 9051837		b. DATE (YYYYMMDD) 20150724		22a. OFFICIAL AUTHORIZED TO SIGN (Typed name, grade, title signature) ESIGNED BY: KEEFER, SANDRA, LEE, 1044746642	
		SANDRA L KEEFER, GS11, CHIEF, TRANSITION CEN		b. DATE (YYYYMMDD) 20150724	

SPECIAL ADDITIONAL INFORMATION (For use by authorized agencies only)

23. TYPE OF SEPARATION RETIREMENT		24. CHARACTER OF SERVICE (Include upgrades) HONORABLE	
25. SEPARATION AUTHORITY AR 635-40, CHAP 4		26. SEPARATION CODE SEK	
27. REENTRY CODE 4R		28. NARRATIVE REASON FOR SEPARATION DISABILITY, TEMPORARY (ENHANCED)	
29. DATES OF TIME LOST DURING THIS PERIOD (YYYYMMDD) NONE		30. MEMBER REQUESTS COPY 4 (Initials) RK	



THE UNITED STATES OF AMERICA

TO ALL WHO SHALL SEE THESE PRESENTS, GREETING: THIS IS TO CERTIFY THAT THE PRESIDENT OF THE UNITED STATES OF AMERICA AUTHORIZED BY EXECUTIVE ORDER, 24 AUGUST 1962 HAS AWARDED

THE BRONZE STAR MEDAL

WITH "V" DEVICE
SERGEANT RAFFIQUE KHAN
72D MEDICAL DETACHMENT (VETERINARY SERVICES)

TO

FOR EXCEPTIONALLY VALOROUS ACHIEVEMENT WHILE ASSIGNED AS A FOOD INSPECTION NONCOMMISSIONED OFFICER TO VETERINARY SERVICES DETACHMENT DELTA WHILE DEPLOYED IN SUPPORT OF OPERATION ENDURING FREEDOM. SERGEANT KHAN, AT RISK TO HIS OWN SAFETY, PROVIDED COVERING FIRE, LIFE SAVING MEDICAL FIRST AID TO CASUALTIES, AND EVACUATED THEM TO THE MEDICAL TREATMENT FACILITY. SERGEANT KHAN'S ACTIONS REFLECT DISTINCT CREDIT UPON HIMSELF, TASK FORCE MEDICAL-AFGHANISTAN, AND THE UNITED STATES ARMY.

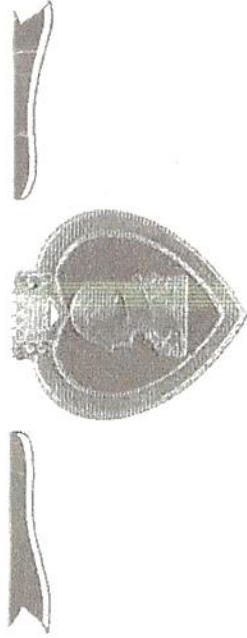
ON 1 JUNE 2012

GIVEN UNDER MY HAND IN THE CITY OF WASHINGTON
THIS 3D DAY OF AUGUST 2012


RICKY D. GIBBS
Brigadier General, United States Army
Deputy Commanding General,
Headquarters, V Corps
Permanent Order #216-101




SECRETARY OF THE ARMY



THE UNITED STATES OF AMERICA

TO ALL WHO SHALL SEE THESE PRESENTS, GREETING:

THIS IS TO CERTIFY THAT
THE PRESIDENT OF THE UNITED STATES OF AMERICA
HAS AWARDED THE

PURPLE HEART

ESTABLISHED BY GENERAL GEORGE WASHINGTON
AT NEWBURGH, NEW YORK, AUGUST 7, 1782
TO

SERGEANT RAFFIQUE N. KHAN

FOR WOUNDS RECEIVED

IN ACTION

ON 1 JUNE 2012

GIVEN UNDER MY HAND IN THE CITY OF WASHINGTON

THIS 21ST DAY OF JULY 2012

Ricky D. Gibbs
RICKY D. GIBBS

BRIGADIER GENERAL, U.S. ARMY
DEPUTY COMMANDING GENERAL

Permanent Order # 203-102

John W. McHugh





VETERINARY SERVICE NEWS



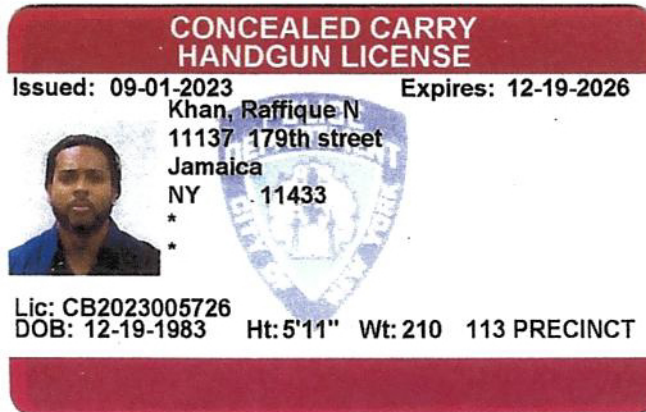
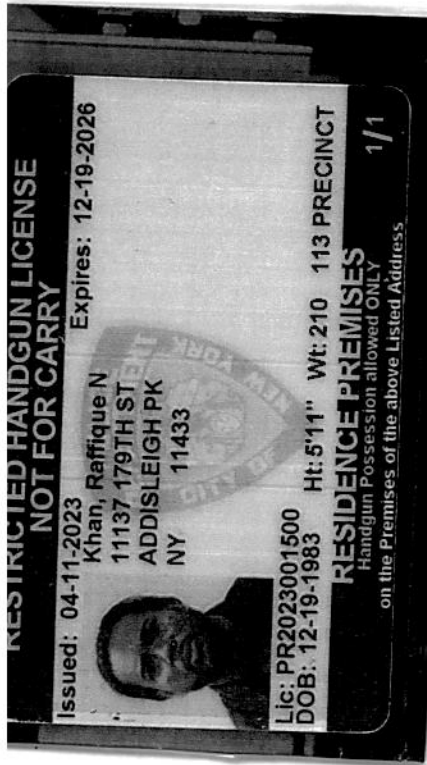
May 2013

Join us in Congratulating USO Service Member of the Year - FORSCOM Nominee SSG Raffique Khan

SSG Raffique Khan, 72nd Medical Detachment (VS), is the FORSCOM USO Soldier of the Year nominee. Each year, the USO honors true American heroes at the USO World Gala in Washington, D.C. The award is presented to an outstanding and heroic junior enlisted member of the Army (Active, Reserve or Guard).




SSG Khan, a Food Inspection Noncommissioned Officer (68R) deployed to FOB Salerno, Afghanistan Jan12-Jan13 with the 72nd MDVS. A Sergeant at the time, SGT Khan distinguished himself during the 1 June 2012 insurgent attack against the FOB. After a Suicide Vehicle Borne Improvised Explosive Device destroyed the DFAC where he and his team were eating, SGT Khan extracted trapped personnel from the wreckage and initiated first aid on the wounded. He engaged advancing insurgents with M16 fire, and continued to provide security at an impromptu casualty collection point until the attack was defeated and the casualties evacuated. For his heroic actions, SGT Khan was awarded the Bronze Star Medal for Valor and the Combat Action Badge, and also received the Purple Heart for his injuries.



Serial No.
308191

HANDGUN PURCHASE AUTHORIZATION



Khan
Licensee's Last Name

Raffique
Licensee's First Name

9/13/23
Date of Issue

Carry Premises

CB2023005726
Handgun License No.



HANDGUN PURCHASE AUTHORIZATION
PD 643-053 (Rev. 11-07)

Date Issued: 9/13/23 Date Expires: —

Purchaser's Name/Address
Raffique Khan
11137 179th street
Jamaica, NY 11433

Issued By
PRAA II
Commanding Officer, License Division

Serial No.
308191

Purchase Restricted To: 1GUN

Purchaser's Signature
[Signature]

Carry Premises License No.
CB2023005726

Federal law under the Gun Control Act of 1968 prohibits the transfer, sale, trade or the giving, transporting or delivery of a handgun to a non-resident of a state by any licensed dealer or individual. K. Gibson

NOT VALID AFTER EXPIRATION DATE

Date of Sale	Serial No. of Handgun (If foreign make include alphabetical designation preceding and following number)	Make	Calibre	Type	Model
Seller's Signature		NICS#			(If applicable, strike out one) Dealer's Lic. No. Handgun Lic. No. Where Issued
Address					If seller is a Peace Officer, state Police Dept./Agency, Rank/Title, Shield No.

This coupon shall be removed and retained by Person who sells or otherwise provides licensee with Handgun.

- NOTE: The following items must be submitted to the License Division by the Licensee within 72 hours of the purchase/acquisition of the handgun listed hereon.
1. The handgun must be presented for inspection: it must be transported UNLOADED in a locked container.
 2. Receipt for Purchase/Exchange/Sale.
 3. Handgun License(s)
 4. Completed form PD 643-053

Woodhaven Rifle & Pistol

INVOICE

7416 Jamaica Ave.
Woodhaven New York 11421

(718) 296-8888

INVOICE	DATE
61620	08/30/2023 12:59p
ACCT	EMPL ID
12779	DEFAULT
PO	

Sold To: Raffique Khan 04/24
PR2023001500 12/19/1983
11137 179 Street
Jamaica NY 11433
CB2023005726

QTY	SKU#	DESCRIPTION	PRICE EA	TOTAL
1	PJH2036	S&W Equalizer 9mm 3.625" Bar Blue 10 Rd TS 13732	499.00	499.00
1	NICS #	CB2023005726		
1	OCCUPATION	Environmental Officer - Dept Interior		

Customer Loyalty Points:

1 point for every \$10.00 spent. Each 100 points gets \$10.00 store credit toward next purchase. Minimum points to be taken 100. Loyalty points will expire after 1 year and will not be available for redemption. Exclusions apply.

NYC Dealers in Firearms 2010GD102002
NYC Dealer in Rifles & Shotguns # 176
NYC Consumer Affairs License # 0735409
FFL # 6-11-081-01-5D-03658

Return Policy:

Items may only be returned with sales receipt. Your purchase must be returned in saleable condition with original packaging including manuals and parts. Woodhaven Rifle & Pistol Range reserves the right to refuse any return.

Shop online at www.woodhavenrange.com

61620

Points: 73

Visa/MC 7921	543.29	SUBTOTAL	499.00
		Tax	44.29
		TOTAL	543.29
		AMOUNT RECEIVED	543.29
		BALANCE	0.00

CONCEALED CARRY FIREARM 18 HOUR TRAINING COURSE

BE IT KNOWN THAT

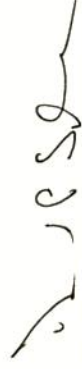
RAFFIQUE KHAN

Has established the statewide minimum standards for the concealed carry firearms training course as required by New York Penal Law 400.00(19) and promulgated pursuant to New York Executive Law 837(23) (a) and 235(1). They have completed the 16 hours of in-person classroom instruction with a passing grade and the 2 hour live fire training using marking cartridges (non-lethal training ammunition) or live ammunition demonstrating proficiency by completing and passing live fire assessment.

CONDUCTED ON

APRIL 19, 2023, APRIL 20, 2023, APRIL 26, 2023, APRIL 27, 2023

WOODHAVEN RIFLE & PISTOL RANGE, INC.
74-16 JAMAICA AVENUE
WOODHAVEN, NEW YORK 11421
718-296-8888



DONALD P. SPALLONE
SECRETARY
NRA Certified Instructor # 1602972

Rev. 7/91
 U.S. Office of Personnel Management
 FPM Supp. 296-33, Subch. 4

NOTIFICATION OF PERSONNEL ACTION

1. Name (Last, First, Middle)					2. Social Security Number			3. Date of Birth			4. Effective Date		
FIRST ACTION						SECOND ACTION							
5-A. Code		5-B. Nature of Action				6-A. Code		6-B. Nature of Action					
5-C. Code		5-D. Legal Authority				6-C. Code		6-D. Legal Authority					
5-E. Code		5-F. Legal Authority				6-E. Code		6-F. Legal Authority					
7. FROM: Position Title and Number						15. TO: Position Title and Number							
8. Pay Plan	9. Occ. Code	10. Grade or Level	11. Step or Rate	12. Total Salary		13. Pay Basis	16. Pay Plan	17. Occ. Code	18. Grade or Level	19. Step or Rate	20. Total Salary/Award		21. Pay Basis
12A. Basic Pay		12B. Locality Adj.	12C. Adj. Basic Pay		12D. Other Pay	20A. Basic Pay		20B. Locality Adj.	20C. Adj. Basic Pay		20D. Other Pay		
14. Name and Location of Position's Organization						22. Name and Location of Position's Organization							
EMPLOYEE DATA													
23. Veterans Preference						24. Tenure			25. Agency Use		26. Veterans Preference for RIF		
	1 - None	3 - 10-Point/Disability		5 - 10-Point/Other			0 - None	2 - Conditional			YES	NO	
	2 - 5-Point	4 - 10-Point/Compensable		6 - 10-Point/Compensable/30%			1 - Permanent	3 - Indefinite					
27. FEGLI						28. Annuitant Indicator			29. Pay Rate Determinant				
30. Retirement Plan						31. Service Comp. Date (Leave)			32. Work Schedule			33. Part-Time Hours Per Biweekly Pay Period	
POSITION DATA													
34. Position Occupied				35. FLSA Category			36. Appropriation Code			37. Bargaining Unit Status			
	1 - Competitive Service	3 - SES General			E - Exempt								
	2 - Excepted Service	4 - SES Career Reserved			N - Nonexempt								
38. Duty Station Code				39. Duty Station (City - County - State or Overseas Location)									
40. Agency Data		41.		42.		43.		44.					
45. Remarks													
46. Employing Department or Agency						50. Signature/Authentication and Title of Approving Official							
47. Agency Code		48. Personnel Office ID		49. Approval Date									

CRIMINAL COURT OF THE CITY OF NEW YORK
PART APAR COUNTY OF KINGS

THE PEOPLE OF THE STATE OF NEW YORK

STATE OF NEW YORK
COUNTY OF KINGS

V

RAFFIQUE KHAN

POLICE OFFICER MATTHEW S BESSEN SHIELD NO. 14934, OF 075 COMMAND SAYS THAT ON OR ABOUT NOVEMBER 26, 2023 AT APPROXIMATELY 04:31 AM AT NE CORNER NEWPORT ST AND CHESTNUT ST COUNTY OF KINGS, STATE OF NEW YORK,

THE DEFENDANT COMMITTED THE OFFENSE(S) OF:

- PL 265.03(3) CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE (DQO)
- PL 265.01-B(1) CRIMINAL POSSESSION OF A FIREARM (DQO)
- PL 265.01(1) CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE
- AC 10-131(I)(3) POSSESSION OF PISTOL AMMUNITION

IN THAT THE DEFENDANT DID:

NOT BEING AUTHORIZED TO POSSESS A PISTOL OR REVOLVER WITHIN THE CITY OF NEW YORK, POSSESS PISTOL OR REVOLVER AMMUNITION; POSSESS ANY FIREARM, ELECTRONIC DART GUN, ELECTRONIC STUN GUN, SWITCHBLADE KNIFE, PILUM BALLISTIC KNIFE, METAL KNUCKLE KNIFE, CANE SWORD, BILLY, BLACKJACK, BLUDGEON, PLASTIC KNUCKLES, METAL KNUCKLES, CHUKA STICK, SAND BAG, SANDCLUB, WRIST-BRACE TYPE SLINGSHOT OR SLUNGSHOT, SHIRKEN OR KUNG FU STAR; POSSESS ANY FIREARM;; POSSESS ANY LOADED FIREARM AND THAT SUCH POSSESSION DID NOT TAKE PLACE IN DEFENDANT'S HOME OR PLACE OF BUSINESS;.

THE SOURCE OF DEPONENT'S INFORMATION AND THE GROUNDS FOR DEPONENT'S BELIEF ARE AS FOLLOWS:

THE DEPONENT STATES THAT, AT THE ABOVE TIME AND PLACE, WHICH IS A PUBLIC STREET, DEPONENT OBSERVED AND RECOVERED A BLACK LOADED 9MM SMITH AND WESSON EQUALIZER WITH TEN (10) .9MM ROUNDS IN THE MAGAZINE FROM THE GLOVE BOX OF THE DEFENDANT'S VEHICLE.

THE DEPONENT IS INFORMED BY THE OFFICIAL, COMPUTERIZED RECORDS OF THE NEW YORK CITY POLICE DEPARTMENT THAT THE DEFENDANT IS LICENSED TO CARRY A FIREARM OR AMMUNITION WITHIN NEW YORK CITY WHILE CONDUCTING BUSINESS AT THE DEFENDANT'S BUSINESS ADDRESS PURSUANT TO DEFENDANT'S NYC FIREARM PERMIT CB2023005726 AND THE ABOVE-MENTIONED LOCATION WAS NOT THE DEFENDANT'S ADDRESS IN VIOLATION OF THE PERMIT.

FALSE STATEMENTS MADE IN THIS DOCUMENT ARE PUNISHABLE AS A CLASS A MISDEMEANOR PURSUANT TO SECTION 210.45 OF THE PENAL LAW.

11/26/23 PO Bessen

DATE SIGNATURE



NYPD Property Clerk Invoice
PD 521-141(Rev.12/18)



Invoice No. **4001052896**

Invoicing Command
113RD PRECINCT

Invoice Status
OPEN

Invoice Date: **11/28/2023** Property Type: **FIREARM** Property Category: **SAFEKEEPING**

Officers	Rank	Name	Tax No.	Command	OCME/EU No.
Invoicing Officer			975468	113 PRECINCT	
Arresting Officer					OCME/FB No.
Investigating Officer					Police Lab Evid.Ctrl.No.
Det Squad Supervisor					Det Sqd. Case No.
CSU/ECT Processing					CSU/ECT Run No.

Item	Total QTY	Article(s)	Estimated Value	Pkg. No.	QTY	Disposition
1	1	PISTOL MAKE: SMITH & WESSON MODEL: M&P9M CALIBER: 9MM COLOR: BLACK/BLACK SERIAL NO.: NML8334 SERIAL NO. EXISTS: YES LICENSE ACTIVE: YES LICENSEE FIRST NAME: RAFFIQUE LICENSEE LAST NAME: KHAN LICENSEE HOUSE NO.: 11137 LICENSEE STREET: 179 STREET LICENSEE CITY: QUEENS LICENSEE POSTAL CODE: 11433 LICENSEE BUSINESS TEL.: 7188078133 DESCRIPTION: FAIR CONDITION		1205233036	1	
Total Cash Value			0.00			

REMARKS

975468 11/28/2023 14:58 : the above item is being kept for safekeeping. As per the Commanding Officer at the Licensing Division Khan cannot get this gun back unless he receives permission from the license agency.

975468 11/28/2023 16:25 : Invoice Approved By 959440

363952 01/17/2024 14:38 : Additional Remarks - Owner Khan, Raffique license no. CB2023005726

Date of Incident	Penal Code/Description	Crime Classification	Related To	Receipt
11/28/2023	NONE/NONE	NONE		YES

Prisoner(s) Name	D.O.B	Age	Address	Arrest No./Summons No.	NYSID No.

Complaint No. **N/A**

Related Comp No.(s) **N/A**

Aided/Accident No.(s) **N/A**

Related Invoice(s) **N/A**

Approvals	Rank	Name	Tax No.	Command	Date	Time
Entered By			975468	113 PRECINCT	11/28/2023	14:58
Invoicing Officer			975468	113 PRECINCT	11/28/2023	16:25
Approved By			959440	113 PRECINCT	11/28/2023	16:25



Invoice No. **4001052896**

Prisoner/ Finder/ Owner Copy
printed: 03/07/2024 12:35

PCD Storage No.
24Q002378
Page No.1 of 3



LAW OFFICES OF
CORY H. MORRIS
ATTORNEY &
COUNSELOR AT LAW

VIA ELECTRONIC MAIL AND HAND DELIVERY

MARCH 11, 2024

NYPD LICENSE DIVISION/CONCEALED CARRY UNIT:
DG_LIC-INCIDENTS@NYPD.ORG | DG_LIC-HEARINGS-APPEALS@NYPD.ORG
DG_LIC-CARRY@NYPD.ORG | DG_LIC-HANDGUNRENEWALS@NYPD.ORG
DG_LIC-CARRY-GUARD@NYPD.ORG | DG_LIC-CANCELLATIONS@NYPD.ORG
NEW YORK CITY POLICE DEPARTMENT: JOSEPH.ASTARITA@NYPD.ORG
NEW YORK CITY LAW DEPARTMENT: SERVICEECF@LAW.NYC.GOV

**Re: Illegal Seizure and retention of RET. US ARMY SSG Khan’s firearms,
Concealed Carry Application # CB202300828, License # CB2023006726**

To whom it may concern:

I represent Retired US ARMY SSG Raffique Nishan Khan (“SSG Khan”) who was falsely arrested during a traffic stop on November 26, 2023 and during which his firearms were taken by the New York City Police Department (“NYPD”) to the 75th Police Station.

Pursuant to *Snyder v. County of Nassau*, No. 19-CV-5165 (GRB)(AKT) (E.D.N.Y. Mar. 31, 2021) and *Goldstein v. County of Suffolk*, 2:23-cv-00051 (JMA) (LGD) (E.D.N.Y. Jan. 30, 2023), I demand that the NYPD release of SSG Khan’s property by the end of this week to avoid, among other things, a federal litigation seeking the return of all of his property.

Thank you very much for your anticipated cooperation. Should you have any questions or concerns, please do not hesitate to contact undersigned.

Sincerely,


Cory H. Morris, JD MA

Encl: Litigation Hold Notice
 Arrest Report
 Bronz Star and Purple Heart
 Concealed Carry Permit Application
 NYPD Property Clerk Invoice
 Department of Veterans Affairs
 Concealed Carry and Applications

cc: Nicole Schill, Esq. Legal Aid Society (NSchill@legal-aid.org)

LITIGATION HOLD NOTICE

To: NEW YORK CITY
ERIC L. ADAMS, Mayor, City of New York
NEW YORK CITY POLICE DEPARTMENT (NYPD)
EDWARD A. CABAN, Police Commissioner
MICHAEL GERBER, Deputy Commissioner of
Legal Matters (DCLM) responsible for the
License Division
JOSEPH KENNY, Chief of Detectives
MIGUEL A. IGLESIAS, Chief of Internal Affairs
JOHN M. CHELL, Chief of Patrol Services
JOHN BENOIT, Chief of Personnel
NYPD Officer **MATTHEW S. BESSEN**,
Shield No 14934

PLEASE TAKE NOTICE that each of you and all of you, and each attorney and law firm who represents you or any of you, and each attorney and law firm who has represented you in the past with respect to any matter involving Raffique N. Khan is directed to immediately implement a “litigation hold” such that any documents, data, or electronically stored information (ESI) is and shall be preserved and maintained in its native format, and in accordance with the following safeguards:

Electronic data to be preserved

1. The following types of electronic data and/or the electronic data of the subsidiaries, divisions, agents, employees and relevant third-parties or vendors of each individual or entity to whom this notice is addressed or delivered should be preserved in native format, in accordance with the steps set forth below:
 - 1.1. All electronic mail and information about electronic mail (including message contents, header and logs of e-mail

system usage) sent or received by any custodian relating to Raffique N. Khan.

- 1.1. All social media accounts including but not limited to those on platforms such as Facebook, WhatsApp, Twitter (X), LinkedIn, Snapchat, TikTok, YouTube, Pinterest, Reddit, and any other social media platform.
- 1.2. All databases, including field and structural information as well as records, containing any information relating to Raffique N. Khan.
- 1.3. All logs of activity on any computer systems that have been used to process or store data containing information relating to Raffique N. Khan.
- 1.4. All other electronic data containing information about, or relating to, including but not limited to:
 - 1.4.1. All word processing files and file fragments;
 - 1.4.2. Electronic data created by applications which process financial, accounting and billing information;
 - 1.4.3. All electronic calendar and scheduling program files and file fragments;
 - 1.4.4. All electronic spreadsheet files and file fragments.

On-Line Data Storage

2. With regard to online storage and/or direct access storage devices including, but not limited to, any file server or data array (e.g. RAID) physically or remotely attached to the computers of any individual or entity to whom this notice is addressed or delivered through wired or wireless networking, the undersigned demands that you and each of you do not modify or delete any existing electronic data files that meet the criteria set forth above, unless an exact mirror image has been made and will be preserved and kept accessible for purposes of this litigation.

Off-Line Data Storage, Backups And Archives

3. With regard to any data or information stored offline or in the “Cloud” whether maintained on a public cloud such as, but not limited to, Amazon Web Services (AWS), Microsoft Azure Blob Storage, Google Cloud Storage, IBM Cloud Object Storage, Oracle Cloud Infrastructure Object Storage, Alibaba Cloud Object Storage Service (OSS), Wasabi Hot Cloud Storage, Backblaze B2 Cloud Storage or any private Cloud service which you are hereby directed to identify.
4. With regard to all electronic media used for offline storage, such as magnetic tapes and cartridges, CDs, DVDs, USB devices (e.g. ‘thumb drives’), and any other solid state devices (SSDs) and the like, used with any computer, file server or data array (e.g. RAID), whether physically or remotely attached to the computers of any individual or entity to whom this notice is addressed or delivered through wired or wireless access that contain any electronic information relating to the subject matter of this litigation, the undersigned demands that you and each of you stop any activity that may result in the loss of such data. This demand is intended to cover all removable electronic media used for data storage in any device, including those containing backup and/or archive data sets.

Preservation of Replaced Data Storage Devices

5. You and each of you to whom this notice is directed shall preserve any electronic data storage devices and/or media that may contain data relating to Raffique N. Khan and that it replaces for any reason.

Fixed Drives on Stand-Alone Personal Computers and Network Workstations

6. You and each of you to whom this notice is directed shall not alter, delete or over-write relevant electronic data that existed on fixed drives attached to stand-alone microcomputers,

network workstations and/or data arrays (e.g. RAID) at the time of filing of this action, or perform other procedures such as data compression and disk defragmentation or optimization routines that may impact such data, unless an exact mirror image has been made of such active files and directory listings (including hidden and/or deleted files) for all directories containing such files and that it completely restore any altered, deleted or over-written electronic files and file fragments and arrange to preserve all such data during the pendency of this litigation.

Applications and Utilities

7. You and each of you to whom this notice is directed shall preserve copies of all applications and utilities that may be used to process and/or manage electronic data subject to this Litigation Hold Notice.

Log of System Modifications

8. You and each of you to whom this notice is directed shall maintain an activity log of document modifications made to any electronic data processing system that may affect the capability of any system to process any electronic data relating to Raffique N. Khan.

Personal computers and all other devices used by employees, independent contractors and others under the control of you and each of you

9. You and each of you to whom this notice is directed shall immediately take the following steps with regard to all fixed drives attached internally, externally, physically and/or remotely by wired or wireless access to any personal computers used by any custodian under the control of you and each of you:
 - 9.1. An exact mirror image must be made of all electronic data relating to Raffique N. Khan;

- 9.2. Full directory listings (including hidden and deleted files) for all directories and subdirectories must be written;
10. You and each of you to whom this notice is directed shall immediately take the following steps with regard to all removable drives attached internally, externally, physically and/or remotely by wired or wireless access to any personal computers used by any custodian under the control of you and each of you:
 - 10.1. All removable electronic media, such as floppy diskettes, magnetic tapes and cartridges, CDs, DVDs, USB devices (e.g. 'thumb drives') and the like that existed before the delivery of this letter and that contain relevant data should collected, maintained intact and kept available during the pendency of this litigation.
 11. You and each of you to whom this notice is directed shall immediately take the following steps with regard to all other relevant devices used by any custodian under the control of you and each of you, whether it is internally, externally, physically and/or remotely attached by wired or wireless access to any system used by you and each of you:
 - 11.1. All cellular phones, personal data assistants (e.g. Blackberry, iPhones, iPads), tablets, and/or any other device that stores electronic information (e.g. RAM on printing devices or FAX machines) and the like that existed before the delivery of this letter and that contain relevant data should collected, maintained intact and kept available during the pendency of this litigation, together with voicemail messages, text messages (SMS or otherwise), instant messages, and other communications and notes.

Evidence Created After Receipt of This Notice

12. Any relevant electronic data created after receipt of this Notice should be preserved in a manner consistent with the directions in this Notice.

Metadata

13. As it is relevant to all items cited hereinabove, you and each of you is instructed to preserve all metadata and not to alter, delete and/or over-rite any metadata.

Other materials concerning Raffique N. Khan


14. You and each of you to whom this notice is directed shall immediately identify, protect, and preserve all other materials in whatsoever form they may exist which relate to Raffique N. Khan or that has replaced it for any reason, in particular and more specifically,
 - 14.1. All materials which relate in any way to any of the persons to whom this Litigation Hold Notice is directed in the context of dealings with Raffique N. Khan.
 - 14.2. All materials which are either public record or should be made available under the Public Officers Law §§ 84-89 et seq.

THE REST OF THIS PAGE INTENTIONALLY LEFT BLANK

Specifically with respect to any possibly related action

15. You and each of you to whom this notice is directed shall immediately identify, protect, and preserve all materials in whatsoever form they may exist which may have hitherto been produced or otherwise relate to the actions of Raffique N. Khan, including but not limited to all pleadings filed or submitted whether under seal or not, copies of all depositions, interrogatories, or other discovery materials produced by or on behalf of those to whom this Litigation Hold Notice is directed, or received by any attorneys to whom this Litigation Hold Notice is directed, during the course of any such litigation, and all communications or records of communications involving that litigation.

DATED Central Islip, New York
AT: March 11, 2024



Cory H. Morris, Esq.
THE LAW OFFICES OF CORY H. MORRIS
Attorneys for Raffique N. Khan
863 Islip Avenue
Central Islip, NY 11722
Phone: (631) 450-2515
Email: info@coryhmorris.com
Victor John Yannacone, jr, Esq., *of counsel*
Email: vyannacone@yannalaw.com



LICENSE DIVISION
License Processing Section
One Police Plaza Room 152B
New York, NY 10038
Tel: (646) 610-5560

APPLICATION # CB2023008282
LICENSE # CB2023005726

RAFFIQUE N. KHAN
111-37 179TH STREET
ADDISLEIGH PK, NY 11433-4123

DATE: 08/25/2023

NOTICE OF APPLICATION APPROVAL

Dear Applicant:

Your application for a NYC handgun license has been approved for the following type of license:

Concealed Carry License

**Use this letter to purchase a firearm from a Federally Licensed Firearms dealer (FFL).
Firearms purchased must comply with NYC Rules & Regulations.**

**THE DEALER WILL PROVIDE YOU WITH A BILL OF SALE, BUT WILL NOT
RELEASE THE FIREARM TO YOU AT THIS TIME.**

**HAVE THE DEALER WRITE YOUR NICS# HERE: _____
REMEMBER TO TAKE 2 COLOR PHOTOGRAPHS OF YOUR FIREARM!**

Once you purchase your firearm, you must email the License Division at:
DG_LIC-Purchaseorders@nypd.org
within 72 hours to request an appointment to pick up your license.

Violations of the rules and regulations associated with your license will result in its suspension or revocation.

By the Direction of
I.N.S. H.B.
Inspector Hugh Bogle
Commanding Officer

Woodhaven Rifle & Pistol

7416 Jamaica Ave.
Woodhaven New York 11421

(718) 296-8888

INVOICE

INVOICE	DATE
61620	08/30/2023 12:59p
ACCT	EMPL ID
12779	DEFAULT
PO	

Sold To: Raffique Khan 04/24
PR2023001500 12/19/1983
11137 179 Street
Jamaica NY 11433
CB2023005726

QTY	SKU#	DESCRIPTION	PRICE EA	TOTAL
1	PJH2036	S&W Equalizer 9mm 3.625" Bar Blue 10 Rd TS 13732	499.00	499.00
1	NICS #	CB2023005726		
1	OCCUPATION	Environmental Officer - Dept Interior		

Customer Loyalty Points:

1 point for every \$10.00 spent. Each 100 points gets \$10.00 store credit toward next purchase. Minimum points to be taken 100. Loyalty points will expire after 1 year and will not be available for redemption. Exclusions apply.

NYC Dealers in Firearms 2010GD102002
NYC Dealer in Rifles & Shotguns # 176
NYC Consumer Affairs License # 0735409
FFL # 6-11-081-01-5D-03658

Return Policy:

Items may only be returned with sales receipt. Your purchase must be returned in saleable condition with original packaging including manuals and parts. Woodhaven Rifle & Pistol Range reserves the right to refuse any return.

Shop online at www.woodhavenrange.com

61620

Points: 73

Visa/MC 7921	543.29	SUBTOTAL	499.00
		Tax	44.29
		TOTAL	543.29
		AMOUNT RECEIVED	543.29
		BALANCE	0.00

CONCEALED CARRY FIREARM 18 HOUR TRAINING COURSE

BE IT KNOWN THAT

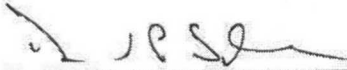
RAFFIQUE KHAN

Has established the statewide minimum standards for the concealed carry firearms training course as required by New York Penal Law 400.00(19) and promulgated pursuant to New York Executive Law 837(23) (a) and 235(1). They have completed the 16 hours of in-person classroom instruction with a passing grade and the 2 hour live fire training using marking cartridges (non-lethal training ammunition) or live ammunition demonstrating proficiency by completing and passing live fire assessment.

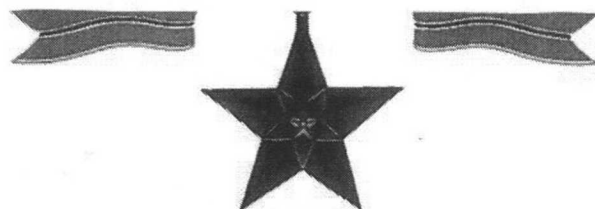
CONDUCTED ON

APRIL 19, 2023, APRIL 20, 2023, APRIL 26, 2023, APRIL 27, 2023

WOODHAVEN RIFLE & PISTOL RANGE, INC.
74-16 JAMAICA AVENUE
WOODHAVEN, NEW YORK 11421
718-296-8888



DONALD P. SPALLONE
SECRETARY
NRA Certified Instructor # 1602972



THE UNITED STATES OF AMERICA

TO ALL WHO SHALL SEE THESE PRESENTS, GREETING: THIS IS TO CERTIFY THAT THE PRESIDENT OF THE UNITED STATES OF AMERICA AUTHORIZED BY EXECUTIVE ORDER, 24 AUGUST 1962 HAS AWARDED

THE BRONZE STAR MEDAL

WITH "V" DEVICE

TO

SERGEANT RAFFIQUE KHAN

72D MEDICAL DETACHMENT (VETERINARY SERVICES)

FOR EXCEPTIONALLY VALOROUS ACHIEVEMENT WHILE ASSIGNED AS A FOOD INSPECTION NONCOMMISSIONED OFFICER TO VETERINARY SERVICES DETACHMENT DELTA WHILE DEPLOYED IN SUPPORT OF OPERATION ENDURING FREEDOM. SERGEANT KHAN, AT RISK TO HIS OWN SAFETY, PROVIDED COVERING FIRE, LIFE SAVING MEDICAL FIRST AID TO CASUALTIES, AND EVACUATED THEM TO THE MEDICAL TREATMENT FACILITY. SERGEANT KHAN'S ACTIONS REFLECT DISTINCT CREDIT UPON HIMSELF, TASK FORCE MEDICAL-AFGHANISTAN, AND THE UNITED STATES ARMY.

ON 1 JUNE 2012

GIVEN UNDER MY HAND IN THE CITY OF WASHINGTON

THIS 3D DAY OF AUGUST 2012

RICKY D. GIBBS
Brigadier General, United States Army
Deputy Commanding General,
Headquarters, V Corps
Permanent Order #216-101



SECRETARY OF THE ARMY



VETERINARY SERVICE NEWS



May 2013

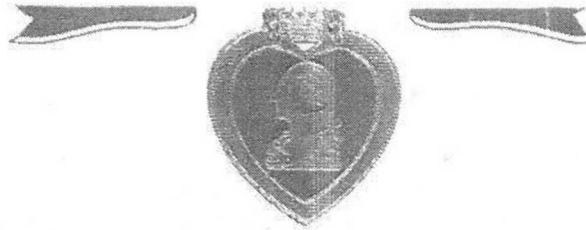
**Join us in
Congratulating
USO Service Member
of the Year -
FORSCOM Nominee
SSG Raffique Khan**

SSG Raffique Khan, 72nd Medical Detachment (VS), is the FORSCOM USO Soldier of the Year nominee. Each year, the USO honors true American heroes at the USO World Gala in Washington, D.C. The award is presented to an outstanding and heroic junior enlisted member of the Army (Active, Reserve or Guard).



SSG Khan, a Food Inspection Noncommissioned Officer

(68R) deployed to FOB Salerno, Afghanistan Jan12-Jan13 with the 72nd MDVS. A Sergeant at the time, SGT Khan distinguished himself during the 1 June 2012 insurgent attack against the FOB. After a Suicide Vehicle Borne Improvised Explosive Device destroyed the DFAC where he and his team were eating, SGT Khan extracted trapped personnel from the wreckage and initiated first aid on the wounded. He engaged advancing insurgents with M16 fire, and continued to provide security at an impromptu casualty collection point until the attack was defeated and the casualties evacuated. For his heroic actions, SGT Khan was awarded the Bronze Star Medal for Valor and the Combat Action Badge, and also received the Purple Heart for his injuries.



THE UNITED STATES OF AMERICA

TO ALL WHO SHALL SEE THESE PRESENTS, GREETING:

THIS IS TO CERTIFY THAT
THE PRESIDENT OF THE UNITED STATES OF AMERICA
HAS AWARDED THE

PURPLE HEART

ESTABLISHED BY GENERAL GEORGE WASHINGTON
AT NEWBURGH, NEW YORK, AUGUST 7, 1782
TO

SERGEANT RAFFIQUE N. KHAN

FOR WOUNDS RECEIVED

IN ACTION

ON 1 JUNE 2012

GIVEN UNDER MY HAND IN THE CITY OF WASHINGTON

THIS 21ST DAY OF JULY 2012

Handwritten signature of Ricky D. Gibbs in black ink.

RICKY D. GIBBS
BRIGADIER GENERAL, U.S. ARMY
DEPUTY COMMANDING GENERAL
Permanent Order # 203-102



Handwritten signature of John W. McHugh in black ink.

Certificate #: U-000002699-F



KINGS SUPREME CRIMINAL COURT

320 Jay Street, Brooklyn, NY 11201

Court ORI: NY023015J

FEE
Non-Public
Version

The People of the State of New York
vs.
Raffique Khan

Certificate of Disposition
Docket Number:

SCR-76890-23/001

CJTN:
NYSID:

70519089M
15535501Y

Arrest Date: 11/26/2023

Arraignment Date: 11/27/2023

Defendant DOB: 12/19/1983

THIS IS TO CERTIFY that the undersigned has examined the files of the Kings Supreme Criminal Court concerning the above entitled matter and finds the following:

Count #	Charge	Charge Weight	Disposition	Disposition Date
1	PL 265.03 03 CF CPW-2nd: Loaded Firearm **SEALED 160.50**	CF	Dismissed (Motion to Dismiss Granted, Sealed 160.50)	02/23/2024
2	PL 265.01-B 01 EF Criminal Possession Firearm **SEALED 160.50**	EF	Dismissed (Motion to Dismiss Granted, Sealed 160.50)	02/23/2024
3	PL 265.01 01 AM Crim Poss Weap- 4th:Firearm/Wep **SEALED 160.50**	AM	Dismissed (Motion to Dismiss Granted, Sealed 160.50)	02/23/2024
4	AC 10-131 13 UM Possession of Pistol Ammunition **SEALED 160.50**	UM	Dismissed (Motion to Dismiss Granted, Sealed 160.50)	02/23/2024

Charge Weight Key: I=Infraction; V=Violation; AM, BM=Class Misdemeanor; UM=Unclassified Misdemeanor; AF, BF, CF, DF, EF=Class Felony

Dated: February 26, 2024

Monica J. Sussone
Chief Clerk/Clerk of the Court

CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE COURT SEAL

All marijuana convictions under PL 221.05, PL 221.10, PL 221.15, PL 221.20, PL 221.35 or PL 221.40—including any appearing on this certificate of disposition—are vacated, dismissed, sealed, and expunged. It is an unlawful discriminatory practice for any entity to make any inquiry about such an expunged conviction or to use such an expunged conviction adversely against an individual in any form of application or otherwise—unless specifically required or permitted to do so by statute. It shall be an unlawful discriminatory practice, unless specifically required or permitted by statute, for any person, agency, bureau, corporation or association, including the state and any political subdivision thereof, to make any inquiry about, whether in any form of application or otherwise, or to act upon adversely to the individual involved, any arrest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55, 170.56, 210.46, 210.47, or 215.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law or by a conviction which is sealed pursuant to section 160.59 or 160.58 of the criminal procedure law, in connection with the licensing, housing, employment, including volunteer positions, or providing of credit or insurance to such individual; provided, further, that no person shall be required to divulge information pertaining to any arrest or criminal accusation of such individual not then pending against that individual which was followed by a termination of that criminal action or proceeding in favor of such individual, as defined in subdivision two of section 160.50 of the criminal procedure law, or by an order adjourning the criminal action in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 215.10 of the criminal procedure law, or by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. An individual required or requested to provide information in violation of this subdivision may respond as if the arrest, criminal accusation, or disposition of such arrest or criminal accusation did not occur. The provisions of this subdivision shall not apply to the licensing activities of governmental bodies in relation to the regulation of guns, firearms and other deadly weapons or in relation to an application for employment as a police officer or peace officer as those terms are defined in subdivisions thirty-three and thirty-four of section 1.20 of the criminal procedure law; provided further that the provisions of this subdivision shall not apply to an application for employment or membership in any law enforcement agency with respect to any arrest or criminal accusation which was followed by a youthful offender adjudication, as defined in subdivision one of section 720.35 of the criminal procedure law, or by a conviction for a violation sealed pursuant to section 160.55 of the criminal procedure law, or by a conviction which is sealed pursuant to section 160.58 or 160.59 of the criminal procedure law. For purposes of this subdivision, an action which has been adjourned in contemplation of dismissal, pursuant to section 170.55 or 170.56, 210.46, 210.47 or 215.10 of the criminal procedure law, shall not be considered a pending action, unless the order to adjourn in contemplation of dismissal is revoked and the case is restored to the calendar for further prosecution. [Executive Law 296(16)]

Charges may not be the same as the original arrest charges.

CPL 160.50: All official records (excluding published court decisions or opinions or records and briefs on appeal) related to the arrest or prosecution on file with the Division of Criminal Justice Services, any court, police agency or prosecutor's office shall not be available to any person or public or private agency.

**SEALED NO PUBLIC
RECORD**

Invoicing Command
113RD PRECINCT

Invoice Status
OPEN

Invoice Date
11/28/2023

Property Type
FIREARM

Property Category
SAFEKEEPING

Officers	Rank	Name	Tax No.	Command	OCME/EU No.
Invoicing Officer			975468	113 PRECINCT	
Arresting Officer					OCME/FB No.
Investigating Officer					Police Lab Evid. Ctrl. No.
Det Squad Supervisor					Det Sqd. Case No.
CSU/ECT Processing					CSU/ECT Run No.

Item	Total QTY	Article(s)	Estimated Value	Pkg. No.	QTY	Disposition
1	1	PISTOL MAKE: SMITH & WESSON MODEL: M&P9M CALIBER: 9MM COLOR: BLACK/BLACK SERIAL NO.: NML8334 SERIAL NO. EXISTS: YES LICENSE ACTIVE: YES LICENSEE FIRST NAME: RAFFIQUE LICENSEE LAST NAME: KHAN LICENSEE HOUSE NO.: 11137 LICENSEE STREET: 179 STREET LICENSEE CITY: QUEENS LICENSEE POSTAL CODE: 11433 LICENSEE BUSINESS TEL.: 7188078133 DESCRIPTION: FAIR CONDITION		1205233036	1	
Total Cash Value			0.00			

REMARKS

975468 11/28/2023 14:58 : the above item is being kept for safekeeping. As per the Commanding Officer at the Licensing Division Khan cannot get this gun back unless he receives permission from the license agency.

975468 11/28/2023 16:25 : Invoice Approved By 959440

363952 01/17/2024 14:38 : Additional Remarks - Owner Khan, Raffique license no. CB2023005726

Date of Incident	Penal Code/Description	Crime Classification	Related To	Receipt
11/28/2023	NONE/NONE	NONE		YES

Prisoner(s) Name	D.O.B	Age	Address	Arrest No./Summons No.	NYSID No.

Complaint No. **N/A**

Related Comp No. (s) **N/A**

Aided/Accident No. (s) **N/A**

Related Invoice(s) **N/A**

Approvals	Rank	Name	Tax No.	Command	Date	Time
Entered By			975468	113 PRECINCT	11/28/2023	14:58
Invoicing Officer			975468	113 PRECINCT	11/28/2023	16:25
Approved By			959440	113 PRECINCT	11/28/2023	16:25



DEPARTMENT OF VETERANS AFFAIRS

December 07, 2023

Raffique Nishan Khan
11137 179th St
Addisleigh Park, NY 11433

Dear Raffique Khan:

This letter certifies that Raffique Nishan Khan was discharged from the U.S. Armed Forces having served during the following period(s): **Branch of Service:** ARMY **Entered Active Duty:** JULY 23, 2008 **Character of Service:** Honorable Retired

Discharged: HONORABLE RETIRED SEPTEMBER 23, 2019 WITH THE PURPLE HEART AND BRONZE STAR FOR VALOR

(You may have additional periods of service not listed above.)

If you need general information about benefits and eligibility, please visit us at <https://www.va.gov>.

Call us at 1-800-827-1000.

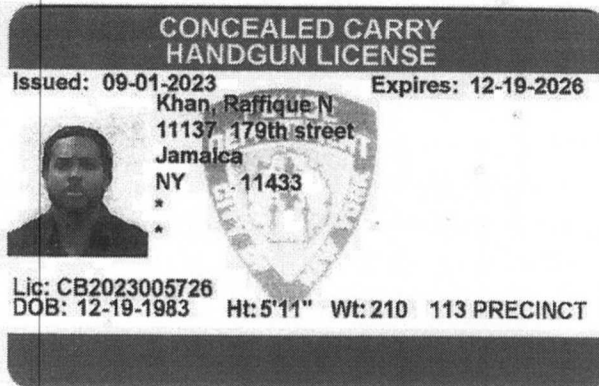
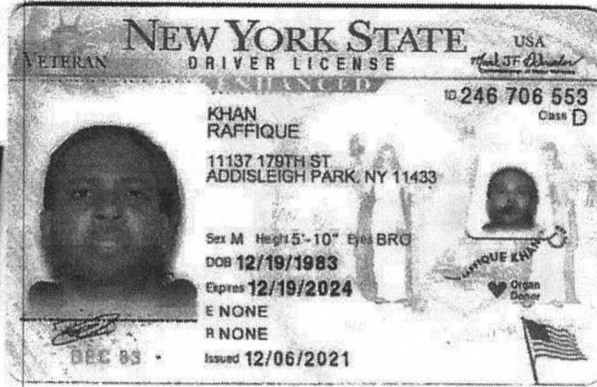
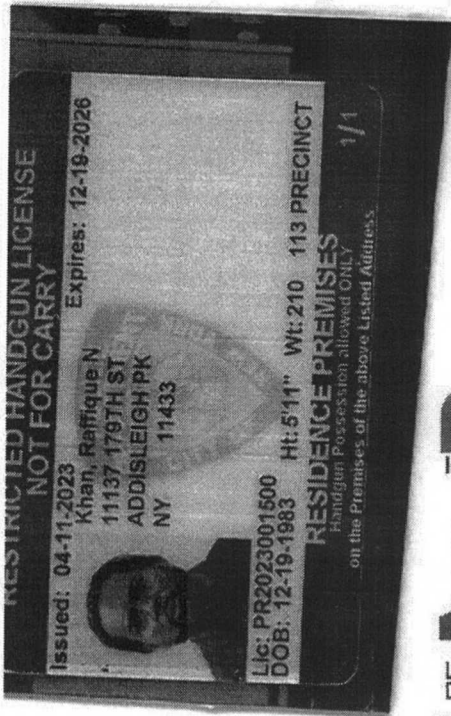
Contact us using Telecommunications Relay Services (TTY) at 711 24/7.

Send electronic inquiries through the Internet at <https://www.va.gov/contact-us>.

How You Can Contact Us


Sincerely Yours,

Regional Office Director



Serial No.
308191

HANDGUN PURCHASE AUTHORIZATION




Khan
Licensee's Last Name

Raffique
Licensee's First Name

9/13/23
Date of Issue

Carry Premises

CB2023005726
Handgun License No.

 **HANDGUN PURCHASE AUTHORIZATION**
PD 643-053 (Rev. 11-07)

Date Issued: 9/13/23 Date Expires: —

Purchaser's Name/Address
Raffique Khan
11137 179th street
Jamaica, NY 11433

Issued By
PRAA II [Signature]
Commanding Officer, License Division

Serial No.
308191

Purchase Restricted To: 1GUN

Purchaser's Signature
[Signature]

Carry Premises License No.
CB2023005726

Federal law under the Gun Control Act of 1968 prohibits the transfer, sale, trade or the giving, transporting or delivery of a handgun to a non-resident of a state by any licensed dealer or individual. K. Gibson

NOT VALID AFTER EXPIRATION DATE

Date of Sale	Serial No. of Handgun (If foreign make include alphabetical designation preceding and following number)	Calibre	Type	Model
Seller's Signature		NICS#		(If applicable, strike out one) Dealer's Lic. No. Handgun Lic. No. Where Issued
Address				

This coupon shall be removed and retained by Person who sells or otherwise provides licensee with Handgun.

NOTE: The following items must be submitted to the License Division by the Licensee within 72 hours of the purchase/acquisition of the handgun listed hereon.

1. The handgun must be presented for inspection; it must be transported UNLOADED in a locked container.
2. Receipt for Purchase/Exchange/Sale.
3. Handgun License(s)
4. Completed form PD 643-053

If seller is a Peace Officer, state Police Dept./Agency, Rank/Title, Shield No.

EMAIL EXCHANGE

February 23, 2024

From: Nicole Schill <nschill@legal-aid.org>
To: Raffique Nishan Khan <raffiquekhan@yahoo.com>;
raffique_khan@nps.gov <raffique_khan@nps.gov>
Sent: Friday, February 23, 2024 at 11:22:30 AM EST
Subject: Fw: RAFFIQUE KHAN SCR-76890-23 - 2/28 GWP

----- Forwarded message -----

Maria E. Neri <meneri@nycourts.gov>
Sent: Friday, **February 23, 2024** 10:32 AM
To: Nicole Schill <NSchill@legal-aid.org>; Susie Williams
<sfwillia@nycourts.gov>; HANNAY, EVAN GERSTC@BrooklynDA.org;
Gerard Dorrian <gdorrian@nycourts.gov>
Cc: MITCHELL, SHELBY MITCHELLS@BrooklynDA.org
Subject: RE: RAFFIQUE KHAN SCR-76890-23 - 2/28 GWP

You don't often get email from meneri@nycourts.gov. Learn why this is important

Good morning,

The People advanced this case to today for purposes of dismissing. The People represented that the defendant is a federal officer working on an Army base and has active carry and conceal permits. The People therefore moved to dismiss the case.

The court granted the People's application and the matter was dismissed and sealed.

Maria E. Neri, Esq.
Principal Court Attorney to
Acting Justice Herbert J. Moses
Kings County Supreme Court, Criminal Term
320 Jay Street
Brooklyn, NY 11201
Chambers Tel: 347-401-9420
Courtroom Tel: 347-296-1113

N.B.: E-mail is not a part of the record and will not be considered by the Court when determining legal issues. Please make any legal arguments on the record in open court, or file them in a document via EDDS.

February 27, 2024

On Tuesday, **February 27, 2024** at 01:42:07 PM EST, Raffique Nishan Khan <raffiquekhan@yahoo.com> wrote:

Good Day PO Astarita

I have great News.... all charges have been dismissed.

Please see Email traffic from the DA and attached Disposition form.

My Name is Retired US ARMY SSG Raffique Nishan Khan.

I was arrested during a traffic stop on NOV 26 2023 and my weapon was taken by the officers from the 75th Police Station.

During the traffic stop, I complied to every demand made by the officers and even told the officer that i had a weapon and a lock box.

I told the Officer several times that i had a permit and it was in my sun visor but the officer did not want to hear anything from me. I did not lie or argue with the police officers.

The officers took me to the police station process me and took me to Central Bookings. When i saw the Judge i was released until the next court date, I did not have to pay any Bond.

During the next court Date the DA Verified that i did have a Weapons Permit and they were waiting for approval for the dismissal.

Please let me know if you have any more questions or need any more information

V/R

RET US ARMY SSG

Raffique Nishan Khan

111-37 179th Street

Addisleigh Park NY, 11433

Cell: 718-807-8133

March 4, 2024

From: Raffique Nishan Khan <raffiquekhan@yahoo.com>
Sent: Monday, **March 4, 2024** 12:23 PM
To: ASTARITA, JOSEPH <JOSEPH.ASTARITA@nypd.org>
Subject: Fw: CB2023005726

V/R

RET US ARMY SSG
Raffique Nishan Khan
111-37 179th Street
Addisleigh Park NY, 11433
Cell: 718-807-8133

March 6, 2024

From: ASTARITA, JOSEPH <joseph.astarita@nypd.org>
To: Raffique Nishan Khan <raffiquekhan@yahoo.com>
Sent: Wednesday, **March 6, 2024** at 10:47:42 AM EST
Subject: Re: CB2023005726

Received, thank you. - PO Astarita

March 8, 2024

From: Raffique Nishan Khan <raffiquekhan@yahoo.com>
To: "joseph.astarita@nypd.org" <joseph.astarita@nypd.org>
Sent: Friday, **March 8, 2024** at 06:44:06 PM EST
Subject: Re: CB2023005726

Good DAy Officer Astarita

Please advise as to what is the next step. I went to the Property Clerk Office but they said you have to authorize the weapon release

V/R

RET US ARMY SSG
Raffique Nishan Khan
111-37 179th Street

Addisleigh Park NY, 11433
Cell: 718-807-8133

Mar 13, 2024

From: Raffique Nishan Khan <raffiquekhan@yahoo.com>
Date: Wed, **Mar 13, 2024**, 10:31 AM
Subject: Fw: CB2023005726
To: JOSEPH ASTARITA <joseph.astarita@nypd.org>, <dg_lic-
incidents@nypd.org>, <dg_lic-hearings-appeals@nypd.org>
Cc: Cory Morris <coryhmorris@gmail.com>

Good Day Officer Astarita

I have called several time and sent the requested information, but the only message i got was on march 6th was stating "RECEIVED".

I spoke to the DA and they sent the release, but when i went to pick up the Weapon they stated that I have to have something from the Licensing Division also.

I called and i also emailed but did not get anyone, I even came down to 1 Police Plaza but they stated that i can not walk-in and must have an appointment.

I live far from the facility and it is not convenient for me to get to 11 front street

Please advise as to what is the next step. As stated before, I went to the Property Clerk Office but they said you have to authorize the weapon release

Mar 14, 2024

From: ASTARITA, JOSEPH <JOSEPH.ASTARITA@nypd.org>
Date: Thu, Mar 14, 2024, 9:17 AM
Subject: Re: CB2023005726
To: DG_LIC-Incidents <DG_LIC-Incidents@nypd.org>, DG_LIC-
Hearings-Appeals <DG_LIC-Hearings-Appeals@nypd.org>, raffiquekhan@yahoo.com <raffiquekhan@yahoo.com>

Cc: Cory Morris <coryhmorris@gmail.com>

Mr. Khan,

Maybe you are not aware of the process regarding your incident. While I have received your recently delivered documents, that does not mean you get your firearms back right away. Your incident is in investigation. When I finish my investigation, it will then be sent to numerous supervisors who will then make a determination. At that time, you will be notified by mail and directed to call for a release and license, if your license is continued. In the meantime, be patient as I hope to have your case completed by midweek next week and then sent on to the supervisors. - PO Astarita