

STATE OF NEW YORK  
COURT OF CLAIMS

STEVEN RUFFIN

Claimant,

-against-

THE STATE OF NEW YORK,

Defendant.

**VERIFIED CLAIM**

CLAIM NO.

\_\_\_\_\_

To the Clerk of the Court of Claims:

Claimant, STEVEN RUFFIN, is a citizen of the United States. His post office address is c/o Law Offices of Joel B. Rudin, P.C., 152 West 57th Street, 8th Floor, New York, New York 10019. Claimant, by his attorney, the Law Offices of Joel B. Rudin, P.C., alleges as follows:

**PRELIMINARY STATEMENT**

1. This is an action, pursuant to Court of Claims Act § 8-b, to compensate Steven Ruffin for his unjust conviction for manslaughter in the first degree and criminal possession of a weapon in the second degree.

2. Steven Ruffin spent more than thirteen years in state prison for a crime he did not commit. At the time of his conviction, Mr. Ruffin was only 18 years old. He was not paroled from prison until he was 32, after spending the entirety of his early adulthood behind bars.

3. Twenty-seven years after his conviction, the Kings County District Attorney’s Office (“KCDAO”) concluded that “Mr. Ruffin was convicted for the actions

of a different person whom he claimed to be the killer all along.” Upon a joint motion by the KCDAO and attorneys for Mr. Ruffin, his conviction was vacated pursuant to CPL § 440.10(g) and (h).

4. Steven Ruffin can establish by clear and convincing evidence that he did not commit any of the acts charged in the indictment and that he did not by his own actions cause his own conviction. He is entitled to damages for the horrific injuries he suffered: spending the prime of his life incarcerated for a crime he did not commit, while law enforcement failed to hold the true perpetrator accountable.

### **PROCEDURAL BACKGROUND**

5. James Deligny was shot to death in Brooklyn, New York, on February 5, 1996.

6. On February 12, 1996, Steven Ruffin was arrested for, and the next day he was charged with, the murder of James Deligny.

7. On or about February 20, 1996, a grand jury indicted Mr. Ruffin on three counts: (1) murder in the second degree, on a theory of intentional homicide, PL § 125.25(1); (2) criminal possession of a weapon in the second degree, PL § 265.03; and (3) criminal possession of a weapon in the third degree, PL § 265.02(4). *See* Exhibit 1, Indictment No. 1857/96.

8. On November 21, 1996, after a trial in the Supreme Court, Kings County, a jury acquitted Mr. Ruffin of murder in the second degree, the first count in the indictment, but convicted him of a lesser included offense, manslaughter in the first

degree, and of criminal possession of a weapon in the second degree, the second count in the indictment. Exhibit 2.

9. At sentencing, Mr. Ruffin maintained his innocence.

10. Ruffin was sentenced to consecutive terms of 12.5 to 25 years of incarceration for manslaughter, and 7.5 to 15 years of incarceration for criminal possession of a weapon. *See* Exhibit 3.

11. On October 4, 1999, the Appellate Division affirmed Ruffin's convictions on direct appeal, but modified the sentence to have the terms run concurrently. *People v. Ruffin*, 265 A.D.2d 350 (2d Dep't 1999). The Court of Appeals denied leave to appeal on November 8, 1999. *People v. Ruffin*, 94 N.Y.2d 828 (1999).

12. On September 16, 2003, Ruffin filed a *pro se* motion under CPL § 440.20(1) to set aside his sentence as illegal and excessive. On November 25, 2003, the trial court denied this motion.

13. Ruffin was released from prison on parole on June 24, 2010. *See* Exhibit 4.

14. Ruffin was discharged from parole supervision on August 13, 2013. *See* Exhibit 5.

15. On January 18, 2024, the KCDAO and attorneys for Mr. Ruffin jointly moved to vacate his convictions pursuant to CPL § 440.10(g) and (h) and dismiss the underlying indictment.

16. In a report issued by the KCDAO that day, it noted, among other things, that Mr. Ruffin's convictions were undermined by exculpatory evidence that was not presented to the jury which exonerated him and implicated another individual as the

perpetrator, that police and prosecutors inadequately investigated the underlying crime, and that the evidence implicating Mr. Ruffin at trial was unreliable.

17. In a press release accompanying the report, Kings County District Attorney Eric Gonzalez stated that “Mr. Ruffin was convicted for the actions of a different person whom he claimed to be the killer all along.”

18. At the vacatur proceeding, counsel for Mr. Ruffin noted on the record that “the parties agree that Mr. Ruffin did not, in fact, commit the crime at issue, the fatal shooting of 16-year old James Deligny, but that [another] individual did commit the crime.”

19. Assistant District Attorney Charles Linehan, the Chief of the KCDAO’s Conviction Review Unit (“CRU”), stated on the record that the “CRU’s extensive reinvestigation of this case... convinced us that Mr. Ruffin did not commit this crime.”

20. The Honorable Matthew D’Emic, J.S.C., granted the motion the same day, vacating Mr. Ruffin’s convictions pursuant to CPL § 440.10(g) and (h), and dismissing the underlying indictment. Exhibits 6, 7.

### **RELEVANT FACTUAL BACKGROUND**

21. On the evening of February 5, 1996, Claimant Steven Ruffin’s sister, Diane Nevet Ruffin (“Nebet”), was robbed of her earrings outside her home at 1 Revere Place in Brooklyn, New York.

22. Nevet was pregnant at the time.

23. Her then-boyfriend Johnne Glover was the father.

24. Claimant Ruffin, Nevet, Glover, Claimant's and Nevet's cousin Willie Jabar Alexander, their neighbor Derrick Jones, and Jones' cousin Jared White, attempted to pursue the robber.

25. The group sought to catch up to an individual walking on the street, whom they suspected was the robber.

26. This individual was named James Deligny.

27. Claimant Ruffin and Nevet lagged well behind the rest of the group, because Nevet was pregnant and couldn't move as fast as the others.

28. Upon being confronted, in the vicinity of 11 Kingston Avenue in Brooklyn, Deligny motioned as though he had a gun.

29. Johnne Glover then shot Deligny.

30. At the time of the shooting, Claimant and Nevet were at least half a block away.

31. Detective Ivan Rivera of the New York City Police Department ("NYPD") was assigned to lead the investigation, and was assisted by, among other members of the NYPD, Detective Louis Scarcella and his frequent partner Detective Steven Chmil of the Brooklyn North Homicide Squad.

32. Scarcella and Chmil are now infamous for their illegal practices of falsifying or coercing confessions, pressuring informants to falsify accusations, and manufacturing false or unreliable identifications through improperly suggestive procedures.

33. As one judge stated in overturning a conviction in one of Scarcella's cases:

The findings of this court are that *the assigned Detective, Louis Scarcella, was at the time of the investigation [in 1991] engaged in false and misleading practices*. The cases of David Ranta, Derrick Hamilton, Robert Hill, Alvena Jennette and Darryl Austin that were investigated by Scarcella and prosecuted contemporaneously with this case in the early nineties demonstrate this *pattern and practice*. [This decision was issued before several more cases involving Scarcella were overturned.] The *pattern and practice of Scarcella's conduct which manifest a disregard for rules, law and the truth* undermines our judicial system and gives cause for a new review of the evidence.

*People v. Hargrove*, 49 Misc. 3d 1208(A), 2015 WL 6112660, at \*8 (Sup. Ct. Kings Cnty. 2015) (emphasis added), *aff'd*, 162 A.D.3d 25 (2d Dep't 2018).

34. Steven Ruffin is at least the 21<sup>st</sup> defendant to have a conviction reversed in a case tied to Louis Scarcella.

35. Individuals whose Scarcella-tied convictions were reversed prior to Ruffin's served a total of at least 268 years in prison.

36. On February 12, 1996, police forcibly arrested Ruffin, striking him repeatedly.

37. Detectives Scarcella and Rivera subjected Ruffin to a relentless custodial interrogation at the NYPD's 79<sup>th</sup> Precinct.

38. Ruffin was 17 years old at the time.

39. After Scarcella and Rivera read *Miranda* warnings to Ruffin, they asked him if he wanted to talk to a lawyer.

40. Ruffin asked whether he needed a lawyer.

41. One of the detectives told Ruffin that he did not need a lawyer.

42. Led to believe he was a suspect, Ruffin truthfully told Scarcella and Rivera that his sister had been robbed earlier on the night of the shooting, that his sister was with him when the shooting took place, and that they were a half-block away from the site of the shooting.

43. He further told them that he did not have a gun and did not shoot anyone.

44. Ruffin then signed a statement denying that he committed the shooting or possessed a gun.

45. Scarcella then left the room and spoke on the phone with Claimant Ruffin's sister, Nevet.

46. Nevet confirmed that she was with Ruffin at the time of the shooting. *See* Exhibit 8 (Affidavit of Diane Nevet Ruffin).

47. Nonetheless, Scarcella returned to the room and accused Ruffin of lying.

48. Scarcella told him, falsely, that his sister had told Scarcella that she was not with Ruffin at the time of the shooting.

49. Ruffin said that he was telling the truth and was not the shooter.

50. He continued to resist Scarcella's attempts to get him to admit something he had not done and signed a second written statement denying guilt.

51. After this, Scarcella appeared angry.

52. He told Ruffin that if he did not admit he was the shooter, he would be imprisoned for 35 to 50 years.

53. Ruffin continued to tell detectives that he wasn't the shooter.

54. Scarcella left the room, and then Rivera took over.

55. He accused Ruffin of lying and demanded that he stop doing so.

56. Scarcella returned to the room with Claimant's father, Steven Ruffin.

57. He was a police officer who worked at the 79<sup>th</sup> Precinct.

58. Ruffin had a distant relationship with his father, who did not raise him and spent little time with him.

59. Detectives at the 79<sup>th</sup> Precinct had represented to Ruffin's father that they were certain that his son was the perpetrator.

60. Ruffin told his father that he did not commit the shooting.

61. Ruffin's father insisted to his son that he tell the "truth" (which obviously meant admitting guilt), otherwise he would spend his life imprisoned.

62. The detectives and Ruffin's father made clear to Ruffin that they were not interested in hearing any explanation of what occurred or who the shooter was if it did not involve his admission of his own guilt.

63. They indicated to Ruffin that, unless he confessed, the detectives would go after his pregnant sister, who had been with him at the time of the shooting, and that her child would be born in jail.

64. However, Ruffin's father and the detectives told Ruffin that, if he admitted the crime, they would ensure that he received leniency.

65. In this vein, they suggested to him that if he admitted the shooting, they would try to paint it as self-defense.



66. Giving in to the detectives' and his father's coercive tactics, and trusting that his police officer-father would not lie to him, Ruffin then provided a false story, confessing to shooting the victim as he appeared to be reaching for a weapon.

67. Ruffin had been in custody for over five hours by that point.

68. Scarcella asked Ruffin where the gun used in the shooting was.

69. Ruffin told Scarcella that he believed Glover had the gun.

70. As a result of their coercive tactics, the police obtained a third written statement from Ruffin, this one falsely admitting he was the shooter.

71. Ruffin's father and Detectives Scarcella and Rivera retrieved the gun from Glover.

72. Although Glover's possession of the gun was obviously unlawful, they did not ask him any questions about how he came to possess it, nor did they arrest him for possessing it.

73. Rivera told Ruffin that he needed to repeat on camera for the District Attorney what he had told the detectives in his last statement to them.

74. Rivera told Ruffin to not waste their time by repeating his earlier story about not being the shooter.

75. With Rivera present to ensure that Ruffin repeated his false confession, Ruffin then did so in the presence of an assistant district attorney.

76. Separately, on the same day, as Ruffin's father later admitted in sworn testimony, Ruffin fully recanted his false confession.

77. He told his father that Glover was the shooter.

78. However, Ruffin's father did not report this recantation or that Glover was the shooter to the District Attorney.

79. When he testified in his own defense at trial, Ruffin again said that Glover was the shooter.

80. As District Attorney Eric Gonzalez later acknowledged, *see* ¶ 17, *supra*, this was consistent with what Ruffin had said since the beginning of the case.

### **EVIDENCE OF STEVEN RUFFIN'S INNOCENCE**

81. Steven Ruffin can establish by clear and convincing evidence that he did not commit any of the acts alleged in the indictment.

82. To begin, District Attorney Eric Gonzalez and Assistant District Attorney Charles Linehan, the Chief of the Conviction Review Unit, after a complete reinvestigation, *admitted* his innocence. *See* ¶¶ 17, 19.

83. Their admissions are supported by numerous witnesses based upon their personal observations.

84. Willie Jabar Alexander, Derrick Jones, and Jared White have provided sworn statements, and will testify at trial, that they personally witnessed Johnne Glover shoot the deceased. Their statements are attached hereto as Exhibits 9–11.

85. Diane Nevet Ruffin, Claimant's stepfather James Chavis, and Claimant's late grandmother Geneva Wilkins have provided sworn affidavits, and Ms. Ruffin and Mr. Chavis will testify at trial, that Johnne Glover confessed to them that he committed the homicide. *See* Exhibits 8, 12, 13.

86. Willie Jabar Alexander, Derrick Jones, Jared White, and Diane Nevet Ruffin have provided sworn statements, and will testify at trial, that, at the time of the shooting, Claimant Ruffin was merely present in the vicinity. *See* Exhibits 8–11.

87. Claimant Steven Ruffin will credibly testify, consistent with his testimony at his criminal trial and his statements to the Conviction Review Unit, that he did not shoot Jimmy Deligny, that he witnessed Johnne Glover commit the shooting, that he told that to his police officer-father, and that Johnne Glover had a chipped tooth at the time of the incident.

88. An eyewitness, the victim's sister, Cindy Clayton, described the shooter as having such a tooth.

89. Wanda Jones has provided a sworn affirmation, and will testify at trial, that Johnne Glover had a chipped tooth at the time of the incident. *See* Exhibit 14.

90. When called by the defense to testify at Claimant's criminal trial, Glover invoked the Fifth Amendment privilege against self-incrimination as to questions about his tooth and his whereabouts at the time of the shooting.

91. Prior to the trial, Glover had made a recorded call to Ruffin's defense attorney.

92. During this call, Glover admitted he was present at the time of the shooting, along with eyewitnesses Derrick Jones, Willie Jabar Alexander, and Jared White.

93. Glover said that Claimant and Diane Nevet Ruffin were a block and a half away.

94. Glover took steps to confess to the authorities, including going to Legal Aid to obtain a lawyer so he could turn himself in, but eventually decided not to follow through.

95. Glover then disappeared, displaying, as the CRU noted, a “consciousness of guilt.”

96. The CRU also noted that Glover evinced consciousness of guilt when he was interviewed by them during their recent reinvestigation.

97. The CRU reported that Glover falsely claimed that he hadn’t possessed the murder weapon and that he did not learn about Nevet’s robbery until two days after it occurred.

98. In fact, as noted above, police recovered the supposed murder weapon—a revolver—from Glover.

99. Scarcella prevented the gun from being examined for fingerprints or DNA testing by wiping it clean.

100. Even though he had reason to suspect Glover in the shooting, he never exhibited Glover in a lineup.

101. The KCDAO’s report acknowledges that “the police and People’s investigations were wholly inadequate because, among other reasons, Glover was never investigated, apparently due to tunnel vision and confirmation bias.”

102. Also indicative of Ruffin’s innocence is that eyewitness Clayton told police that the shooter was 5 feet 4 inches tall (well below average height for a male), and also stated the shooter was shorter than her, whereas Claimant Ruffin was 5 feet 8 inches tall

(around average height). *See, e.g., Young v. Conway*, 698 F.3d 69, 83 (2d Cir. 2012) (finding two-inch difference between witness’s description of perpetrator as 6 feet tall, and habeas petitioner’s actual height, 5 feet 10 inches, significant because it “is the difference between a man of average height and a tall man,” and because the witness “estimated the perpetrator’s height in relative terms—in relation to her own height of [5 feet 8 inches] or [5 feet 9 inches]—based on her ability essentially to stand ‘face-to-face’ with him”).

103. Aside from his unjust conviction in the underlying case, Claimant Ruffin has never been convicted of a crime.

#### **EVIDENCE THAT CLAIMANT DID NOT BY HIS OWN CONDUCT CAUSE HIS CONVICTION**

104. Steven Ruffin can establish by clear and convincing evidence that he did not by his own conduct cause his conviction.

105. Ruffin made oral, written, and videotaped statements inculcating himself in the crime, but, as shown above, these statements were coerced.

106. A defendant’s coerced statements do not constitute his “own conduct” within the meaning of Court of Claims Act § 8-b. *Warney v. State of New York*, 16 N.Y.3d 428, 436 (2011).

107. Ruffin will testify to the aforementioned facts that show his inculpatory statements were coerced. *See* ¶¶ 37–77, *supra*.

108. Detective Scarcella acted consistent with his pattern of coercing false statements from criminal suspects/witnesses and otherwise manufacturing false evidence, resulting in as many as 21 convictions later being vacated or reversed. *See* ¶ 34, *supra*.

109. In vacating one defendant's conviction for murder, a court reviewed misconduct by Scarcella across various cases involving false or coerced statements and other misconduct, found that he had "engaged in false and misleading practices," and concluded further that "[t]he pattern and practice of Scarcella's conduct [] manifest[s] a disregard for rules, law and the truth." *People v. Hargrove*, 49 Misc. 3d 1208(A), 2015 WL 6112660, at \*8 (Sup. Ct. Kings Cnty. 2015), *aff'd*, 162 A.D.3d 25 (2d Dep't 2018).

110. In another case, a court relied on "new evidence of Scarcella's propensity to embellish or fabricate" to find that there was "a reasonable probability that the [defendant's] alleged confession ... was indeed fabricated." *People v. Louis Holmes a/k/a Shabaka Shakur*, Ind. No. 439/1988 (Sup. Ct. Kings Cnty. May 29, 2015), at 45–46.

111. In Mr. Ruffin's case, true to his practice, Scarcella was out to get a confession by any coercive or other means, regardless of how the evidence developed.

112. The CRU observed that "Det. Scarcella made it abundantly clear that he was convinced of defendant's guilt even before speaking with defendant," told that to Claimant, and refused to accept his denials.

113. Detective Rivera, meanwhile, acknowledged in an interview with the CRU that it was his practice to secure confessions, and the CRU believed that he also was intent on securing one from Ruffin.

114. Like Scarcella and Rivera, Ruffin's estranged father, after detectives told him his son was guilty, was also bent on obtaining a confession from Ruffin.

115. Ruffin's father exploited his relationship with his son together with the police pattern of intimidation to coerce an admission from him.

116. Johnne Glover has testified that Ruffin's father told him that he wanted to hurry up and make Ruffin confess, so that he could get home.

117. As shown above, police violently arrested Ruffin, falsely told him he didn't need a lawyer, refused to accept Ruffin's repeated denials of guilt, repeatedly and angrily told him he was lying, angrily threatened him with 35 to 50 years in prison, made him fear his pregnant sister would be arrested too if he didn't "cooperate" and she would have to deliver her baby in jail, lied to him that his sister contradicted his alibi in order to make him feel hopeless, took advantage of his trust in his father and exploited his father's relationship with his son, kept him isolated from everyone else for approximately five hours, and then offered him a lifeline: extraordinary leniency if he would just admit that he shot the victim essentially in self-defense. Then, when he tried to tell his father that he really was innocent and that Glover was the shooter and assumed his father would tell his fellow officers, his father further betrayed his son's trust by telling no one about these statements.

118. As the Conviction Review Unit observed, "P.O. Ruffin's account to [] defense investigators prior to trial showed that he was intent that defendant was the shooter, despite knowing that Glover had confessed to being the shooter, and that [Nevet] told him she was elsewhere with defendant at the time of the shooting."

119. It further concluded, “All evidence shows that P.O. Ruffin had one goal—to get defendant to confess. His goal was clearly the reason he did not tell anyone about the recantation.”

120. Claimant Ruffin’s inculpatory statements contained indicia of falsity, as the Conviction Review Unit recognized, which further tend to show the statements were coerced in that he was guessing at facts. These indicia included, but were not limited to:

- (a) Ruffin incorrectly said that the gun was a “30 snub nose,” whereas the gun used in the shooting was a .38 caliber.
- (b) Ruffin said that he told the deceased, “Hold on I want to make sure you[’re] the person who robbed my sister,” whereas Clayton gave an account to the contrary.
- (c) Ruffin said that he drew the gun from the left side, whereas Clayton had said the shooter removed a gun from his right pocket.
- (d) Ruffin made up that “John” and “Kay” were at the scene with him, and at one point during his videotaped statements had to be reminded by Detective Rivera that he’d said earlier that Derrick and Anthony were there.

121. As the CRU’s report stated, “[t]he shooter would have known the detailed facts, which defendant got wrong.”

### CAUSE FOR RELIEF

122. Claimant Ruffin repeats and incorporates the preceding paragraphs as though fully set forth herein.

123. This Claim has not been assigned and has not been submitted to any other officer or tribunal for audit or determination.



124. Prosecutors acting on behalf of the State of New York caused Mr. Ruffin to be convicted at trial on November 21, 1996, of manslaughter in the first degree and criminal possession of a weapon in the second degree. *See* Exhibit 2.

125. Mr. Ruffin was sentenced to consecutive terms of 12.5 to 25 years of incarceration for manslaughter, and 7.5 to 15 years of incarceration for criminal possession of a weapon. *See* Exhibit 3.

126. On October 4, 1999, the Appellate Division, Second Department modified the sentence to have the terms run concurrently. *People v. Ruffin*, 265 A.D.2d 350 (2d Dep't 1999).

127. Mr. Ruffin was incarcerated for 13 years, 7 months, and 3 days after his unjust conviction in this case. He then was on parole for 3 years, 1 month, and 20 days. *See* Exhibits 4, 5.

128. As noted above, a court vacated the underlying convictions pursuant to CPL § 440.10(g) and (h), and dismissed the underlying indictment, *see* Exhibits 6, 7, which satisfies the requirements of Court of Claims Act §§ 8-b(3)(b) and 8-b(5)(b).

129. This claim is timely, because the indictment against Ruffin was dismissed on January 18, 2024, *see* Exhibits 6, 7, which is within two years of the filing of the present claim.

130. Claimant can show, by clear and convincing evidence, that he is innocent of the crimes charged against him and did not by his own conduct cause his own conviction.

### **INJURIES AND DAMAGES**

131. Mr. Ruffin was deprived of his liberty for nearly 14 years following his

conviction and then had his liberty severely restricted by the conditions of his parole for 3 years, 1 month, and 20 days.

132. While in prison, Ruffin suffered, among other things, physical assaults; severe mental anguish, including the fear of further assaults and the witnessing of brutal assaults against other prisoners; inadequate medical attention; the loss of virtually all privacy and autonomy; constant humiliation, indignities, embarrassment, and degradation; and severe restrictions on his personal liberty and freedom, including but not limited to diet, sleep, personal contact, athletic opportunity, personal fulfillment, sexual activity, family relations, reading, television, movies, travel, enjoyment, and expression.

133. Mr. Ruffin's unjust imprisonment caused him loss of consortium with his family and his friends. While Mr. Ruffin was in prison, he lost his grandfather, and had to endure the demeaning ordeal of paying his respects at the funeral completely shackled and escorted by armed officers.

134. During Mr. Ruffin's incarceration, his mother was diagnosed with breast cancer, and he was unable to be by her side as she underwent chemotherapy. While his mother's treatment was fortunately successful, she would pass away on March 24, 2013, less than three years after Mr. Ruffin was released from prison, and more than a decade too soon to see his unjust conviction overturned.

135. Mr. Ruffin's unjust conviction for a crime he did not commit caused him mental and emotional suffering, and permanent mental and emotional harm that continues to this day, including, but not limited to, stress, anxiety, sleep deprivation, nightmares, and difficulty being in crowds.

136. Mr. Ruffin’s unjust conviction also caused him additional, ongoing injuries after his release from prison, including the burdens of complying with onerous parole requirements for more than three years.

137. Mr. Ruffin’s unjust conviction caused him to lose substantial income and benefits and suffer permanent diminution of his earning potential. Evidencing his industry and potential earning capacity, Mr. Ruffin has been productively employed following his release from prison. He operated a landscaping business for several years, and then began working for the City of Atlanta in 2019, starting out as a trash collector and rising to the position of assistant installation chief, in which he earns approximately \$61,000 annually. The precise amounts of the past and future wages and benefits Mr. Ruffin would have earned, but for his unjust conviction and wrongful imprisonment, will be determined by an economist.

138. Mr. Ruffin’s family also incurred legal fees that, upon information and belief, totaled at least \$10,000.

139. By reason of the foregoing, Mr. Ruffin is entitled under the Unjust Conviction and Imprisonment Act of 1984 to reasonable and fair damages, the particulars of which are set forth in the following schedule of damages:

Damages for the loss of liberty, physical injuries and mental and emotional suffering caused by Ruffin’s unjust conviction and wrongful imprisonment	\$27,000,000
Damages for past and future wages and benefits Ruffin would have earned but for his unjust conviction and wrongful imprisonment	To be determined
Damages for legal costs	Not less than \$10,000

Steven Ruffin hereby claims total damages from the State of New York in an amount exceeding \$27,010,000.



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Dated: August 28, 2024  
New York, New York

STATE OF NEW YORK  
COURT OF CLAIMS

STEVEN RUFFIN

Claimant,

-against-

THE STATE OF NEW YORK,

Defendant.

VERIFICATION

CLAIM NO.  
\_\_\_\_\_

State of Georgia )  
County of Douglas ) ss:

STEVEN RUFFIN, being duly sworn, deposes and says as follows:

I am the Claimant herein. I have read the foregoing Claim for Damages against the State of New York and know its contents. The same is true to my own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters, I believe them to be true.

*Steven Ruffin*

STEVEN RUFFIN

Sworn to before me this 27<sup>th</sup>  
day of August 2024

*Yvonne L Tribble*  
Notary Public

