

Main Office
959 Kenmore Ave
Buffalo, NY 14223

Admitted in NY and PA
Tel: 716.848.8000
Fax: 716.828.8156

CANTOR, WOLFF, NICASTRO & HALL

PLEASE SEND ALL MAIL TO OUR MAIN OFFICE

INJURY ATTORNEYS

Niagara Falls Office
7703 Niagara Falls Blvd. Suite 3A
Niagara Falls, NY 14304

Albany Office
41 State St. Suite 604-22
Albany, NY 12207

December 9, 2025

Sent Via Email: foil@ecwa.org
Attn: Jennifer L. Hibit- FOIL Officer
Erie County Water Authority
295 Main St., Room 350
Buffalo, NY 14203-2494

Re: Cecelia Sztaba
Date of Incident: August 18-19, 2025
Incident Location: A King's Ransom Thrift Shop and Furniture Consignment
3748 South Park Ave. Blasdell, NY 14219

Dear FOIL Officer:

Please be advised that our office represents Cecelia Sztaba, owner of A King's Ransom Thrift Shop located at 3748 South Park Ave., Blasdell, NY 14219. We are investigating a significant water/mud/sewage intrusion event that occurred on August 18–19, 2025, caused by work being performed by or on behalf of the Erie County Water Authority at Frontier Blasdell Elementary School, 3780 South Park Ave., Blasdell, NY 14219.

Pursuant to the New York Freedom of Information Law, kindly provide all records, documents, reports, photographs, videos, work orders, and communications relating to any ECWA work, maintenance, construction, repair, excavation, or emergency response occurring at or near Frontier Blasdell Elementary, or otherwise affecting South Park Avenue, between August 1, 2025 and September 15, 2025.

Specifically, this request includes but is not limited to:

- **Work Records & Logs**
All work orders, job tickets, daily logs, maintenance logs, and service orders for any ECWA work performed at or near **3780 South Park Ave., Blasdell, NY**, between **August 1 and August 31, 2025**.
- **Description of Work Performed**
Any documents describing the nature, scope, purpose, and location of the ECWA work performed at or near that address during the above period.
- **Incident / Complaint Records**
Any incident reports, service calls, complaints, or other records reflecting flooding, water intrusion, runoff, or operational issues reported on or near **South Park Ave.** on

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August 18–19, 2025.

- **Internal Communications Regarding Problems**

Any internal ECWA communications (emails or memoranda) discussing problems, irregularities, or unexpected conditions encountered during the work performed at or near the above location during **August 2025**.

- **Contractor Identification**

The names of any ECWA contractors or subcontractors who performed or supervised work at or near Frontier Blasdell Elementary during August 2025, and any documents describing their assigned tasks.

If possible, please email all responsive materials to paige@buffalolaw.com. If the documents are too large for email, please advise of any costs for producing records via CD, digital download, or paper copies. I can be reached at 716-848-8000 with any questions.

If any portion of this request is denied, please identify:

1. the specific grounds for denial, and
2. the name, address, and email address of the person to whom an administrative appeal should be directed.

Thank you for your attention to this request. We look forward to your prompt response.

Very truly yours,

/s/ *David Wolff*

David J. Wolff, Jr., Esq.

DJW/ph