



Kenneth W. Jenkins
County Executive

Office of the County Attorney

John M. Nonna
County Attorney

September 15, 2025

Westchester County Board of Legislators
County of Westchester
800 Michaelian Office Building
148 Martine Avenue
White Plains, New York 10601

Re: Request for authorization to commence an action against Machinery Equipment Rebuilders, Paul Miller and/or other parties deemed responsible as may be necessary and appropriate to enforce the return of County property or obtain monetary damages for same.

Dear Honorable Members of the Board:

This request arises from a transaction between Standard Amusements ("SA") and Machinery Equipment Rebuilders and Paul Miller, its principal (collectively "MER"), for the repair and refurbishment of a mechanical gearbox that is necessary for the operation of the Dragon Coaster ride located at Playland.

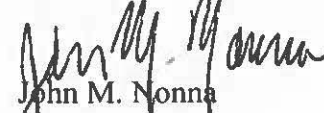
At the time this transaction arose, SA was operating Playland for the County of Westchester ("County") under a written agreement. It is believed that SA hired MER to repair the Dragon Coaster gearbox sometime in March 2025, with an expectation that the gearbox would be returned sometime in April. Unfortunately, despite repeated attempts via telephone calls and emails, MER has not only failed to return the gearbox but also failed to provide any meaningful information regarding the location and status of the gearbox.

The County, through this office, will continue to seek a resolution to the claim. However, if a satisfactory resolution cannot be obtained with MER, litigation is necessary.

In order to protect the County's interests, authority to commence an action against Machinery Equipment Rebuilders, Paul Miller, its purported principal, and any other party as may be necessary and appropriate to enforce the County's rights, is recommended.

Therefore, I am respectfully requesting that this Honorable Board pass the accompanying Act authorizing the County to initiate all legal action, if necessary, including, but not limited to, third-party claims, cross-claims, and/or counterclaims on behalf of the County, as may be necessary against Machinery Equipment Rebuilders, Paul Miller, and/or all other parties deemed responsible as may be necessary and appropriate to enforce the return of County property or obtain monetary damages for same . The Commissioner of Parks Recreation and Conservation concurs with this recommendation.

Very truly yours,



John M. Nonna
County Attorney

JMN/jf
Enclosure

BOARD OF LEGISLATORS
COUNTY OF WESTCHESTER

Your Committee is in receipt of a proposed Act which, if approved by your Honorable Board, would authorize the County Attorney to initiate legal action including, but not limited to, third-party claims, cross-claims, and/or counterclaims on behalf of the County of Westchester ("County"), as may be necessary against Machinery Equipment Rebuilders, Paul Miller (collectively "MER"), and any other party as necessary and appropriate to protect the County's interests in connection with return of the Dragon Coaster gearbox and/or monetary damages for same.

When Standards Amusement was under contract with the County to manage and operate Playland, in or about March 2025 it purportedly entered into an agreement with MER for the repair and refurbishment of the gearbox necessary to operate the Dragon Coaster. The subject gearbox was delivered to MER. However, despite the County's efforts, the gearbox has not yet been returned.

Your Committee concurs with the County Attorney and Westchester County Commissioner of Parks Recreation and Conservation, Kathleen O'Connor, and, therefore, recommends that the Board approve the accompanying Act authorizing the County Attorney to initiate such legal action, including, but not limited to, third-party claims, cross-claims, and/or counterclaims on behalf of the County, as may be necessary against Machinery Equipment Rebuilders, Paul Miller, and any other party deemed responsible as necessary and appropriate to protect the County's interests in connection these claims.

An affirmative vote of a majority of the Board is required to pass this Act.

Dated: October , 2025
White Plains, New York

COMMITTEE ON

l:jf

AN ACT authorizing the County Attorney to initiate legal action including, but not limited to, third-party claims, cross-claims, and/or counterclaims on behalf of the County of Westchester against Machinery Equipment Rebuilders, Paul Miller, and any other responsible party as may be necessary and appropriate to protect the County's interests in connection with return of the Dragon Coaster gearbox and/or monetary damages as may be appropriate.

BE IT ENACTED by the Board of Legislators of the County of Westchester as follows:

Section 1. The County Attorney is hereby authorized on behalf of the County of Westchester to initiate legal action, including, but not limited to, third-party claims, cross-claims, and/or counterclaims on behalf of the County of Westchester against Machinery Equipment Rebuilders, Paul Miller, and/or any other responsible parties as may be necessary and appropriate to protect the County's interests arising for the recovery of equipment identified as the gearbox for the Dragon Coaster ride located at Playland, Rye, New York.

Section 2. The County Attorney or his duly designated representative is hereby authorized to undertake such legal proceedings and prepare all documents necessary or desirable to accomplish the purpose of this Act.

Section 3. This Act shall take effect immediately.