

I swear this statement is correct and true to the best of my knowledge and belief.

Sworn to and subscribed before me, the undersigned authority this 25 of Aug 1978

Office's Signature _____
Ct. ID No. 2504

Det. [Signature]
Deputy of the Court or Notary Public

Arresting Agency 30
(Numeric Code)

PSD RECORD'S COPY

Hold for Magistrate's Hearing. OUT OF COUNTY/STATE WARRANT
Do Not Bond Out. (Officer Must Appear)

104.02-142 REV. JAN. 1974 DETACH IF OTHER THAN ADULT FELONY OFFENDER Police Case No. 206129-V

I.D.S. No. _____ Jail No. 71-41533 Police Case No. 206129-V
P.S.D. Records I.D. No. 035 206407 Municipal P.D.I.D. No. _____

Defendant's Name [Signature] (Last) [Signature] (First) [Signature] (Middle) Date of Birth 4-18-43
(Month, Day, Year)

Alias _____ Local Address 2810 [Signature] (City) (State) (Zip) Sex M Race [Signature]

Permanent Address [Signature] (City) (State) (Zip) Phone [Signature] Hgt. 5'11" Wt. 150

Business Address [Signature] Taken to County Station _____ Eyes [Signature] Hair [Signature]

Soc. Sec. No. 2-2-626839 Occ. MANAGER POB: 11-22-1943 Scars-Tattoos [Signature]

Arrest Date 7-25-78 Time 3:00 PM Location Dade Jail 1321 NW 13th St.
(Month, Day, Year) (Place of Arrest)

Co-Defendant's Name _____ STATUS AT LARGE IN CUSTODY
 FELONY MISDEMEANOR JUVENILE

Co-Defendant's Name _____ STATUS AT LARGE IN CUSTODY
 FELONY MISDEMEANOR JUVENILE

C1 [Signature] In Viol. of E.S. _____ CAPIAS/CIT.

H 2. _____ In Viol. of E.S. _____ CAPIAS/CIT.

R 3. _____ In Viol. of E.S. _____ CAPIAS/CIT.

G 4. _____ In Viol. of E.S. _____ CAPIAS/CIT.

E 5. _____ In Viol. of E.S. _____ CAPIAS/CIT.

S 1. Name [Signature] Address: [Signature] Phone _____

2. Name [Signature] Address: [Signature] Phone _____

Arresting Officers _____ Ct. ID No. 2504 Dept. 010

The undersigned certifies and swears that he has just and reasonable grounds to believe, and does believe that the above named Defendant
On the 25 day of Aug, 1978, At 3:00 PM Dade Jail 1321 NW 13th St.

committed the following violation of law: Narrative; (Be specific) AT APPROX 5:30 AM 25 AUG 78

OFFICER [Signature] WAS CONDUCTING A SEARCH OF THE DEFENDANT AT

A TIME [Signature] WITHIN [Signature] THE DEFENDANT TO STOP

A SEARCH WAS MADE FOR THE PURPOSE OF THE SEARCH, HE [Signature]

CONDUCTED [Signature] VARIOUS PHASES OF THE SEARCH,

HE [Signature] THE EXTENT OF EXAMINING [Signature] AND MOUTH

WHICH [Signature] OVER FOR THE EVALUATION OF THE [Signature]

WHILE HE [Signature] HE WAS ASKED [Signature] ADDITIONAL [Signature]

HE [Signature] HE WAS [Signature]

HE [Signature] HE WAS [Signature]

HE [Signature] HE WAS [Signature]

HE [Signature] HE WAS [Signature]

HE [Signature] HE WAS [Signature]

HE [Signature] HE WAS [Signature]

HE [Signature] HE WAS [Signature]

FOR OFFICIAL USE ONLY
COPY OF BOOKING RECORD
FURNISHED TO: _____
DEPT. _____
DATE: _____
RECORDS & IDENTIFICATION DIVISION
FLORIDA DEPARTMENT OF PUBLIC SAFETY

ADDED (11/8)

[Large handwritten scribbles and signatures at the bottom of the page]

I swear this statement is correct and true to the best of my knowledge and belief.

Sworn to and subscribed before me, the undersigned authority this 24 day of APRIL 19 76

Officer's Signature _____

Arresting Agency 30 - 01 (Numeric Code)

Dept. 30 01 Ct. ID. 472/1486/0920

[Signature]
Deputy of the Court or Notary Public

PSD RECORD'S COPY

Held for Magistrate's Hearing. OUT OF COUNTY/STATE WARRANT
Do Not Bond Out. (Officer Must Appear)

134.02-142 REV. JAN. 1974 DETACH IF OTHER THAN ADULT FELONY OFFENDER Police Case No. 285175-T

I.D.S. No. _____ Jail No. 76-41533 Police Case No. 285175-T

P.S.D. Records I.D. No. 206407 Municipal P.D.I.D. No. 022 529

Defendant's Name CIERO ROLANDO Date of Birth APR 18 43
(Last) (First) (Middle) (Month, Day, Year)

Alias _____ Local Address 2010 FOUNTAINBLEU BOVD Sex M Race _____
(City) (State) (Zip)

Permanent Address _____ Phone _____ Hgt. 5'8" Wt. 150
(City) (State) (Zip)

Business Address _____ Taken to County Station DCJ Eyes BRN Hair BRN

Soc. Sec. No. 352-68-6839 Occ. HOENSK MANAGER POB: HABANA, CUBA Scars-Tattoos NV

Arrest Date APR 24 76 Time 9:10 PM Location MIAMI INT'L AIRPORT
(Month, Day, Year) (Place of Arrest)

Co-Defendant's Name _____ / STATUS AT LARGE IN CUSTODY JUVENILE
(Last) (First) (Middle) FELONY MISDEMEANOR

C1. POSSESSION OF EXPLOSIVES (9) In Viol. of F.S. 552.22 CAPIAS/CIT. # TEMPORARY # CY-MA-1

H A 2. RESIST (9) In Viol. of F.S. 806.01 CAPIAS/CIT. # _____

R 3. DESTRUCTION OF DESTRUCTIVE SERVICE (7) In Viol. of F.S. 790.061 CAPIAS/CIT. # _____

G E 4. _____ In Viol. of F.S. _____ CAPIAS/CIT. # _____

S 5. _____ In Viol. of F.S. _____ CAPIAS/CIT. # _____

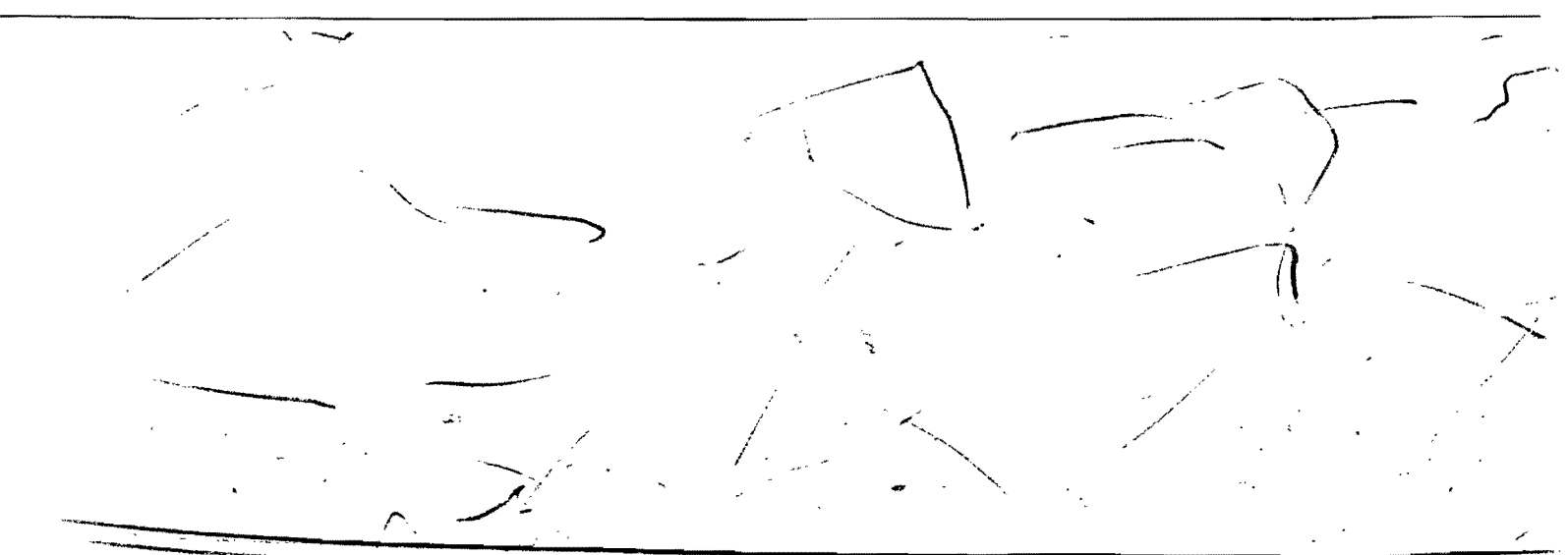
WITNESSES AGAINST DEFENDANT: see reverse side for additional witnesses

In Viol. of Sec. _____ of the code of _____

1. Name _____ Address: _____ Phone _____
2. Name _____ Address: _____ Phone _____

The undersigned certifies and swears that he has just and reasonable grounds to believe, and does believe that the above named Defendant On the 24 day of APRIL, 19 76, At 9:10 PM MIAMI INT'L AIRPORT committed the following violation of law: Narrative; (Be specific) AS PER ABOVE WARRANT

FOR OFFICIAL USE ONLY
COPY OF BOOKING RECORD/AFFIDAVIT/OTHER
FURNISHED TO:
DEPT. _____ BY _____
RECORDS & IDENTIFICATION BUREAU PUBLIC SAFETY DEPT.



MEMORANDUM

107.07-17 A

TO Richard D. Smith, Captain
Internal Review Section

DATE May 27, 1977

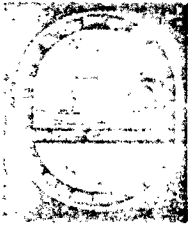
SUBJECT Rolando Otero v.
Metropolitan Dade
County

ROYALL P. TERRY JR,
FROM Royall P. Terry, Jr.
Police Legal Advisor

Attached find summons and complaint served on Metropolitan Dade County received by this office. No prior notice of claim has been received by this office.

Please initiate an investigation into this matter and forward us your report.

RPT/ks
Attachment



METROPOLITAN DADE COUNTY • FLORIDA

INSURANCE MANAGEMENT DIVISION

12th Floor
140 West Flagler Street
Miami, Florida 33130
579-5138

GENERAL SERVICES ADMINISTRATION

May 25, 1977

Mr. Phillip W. Knight
Fowler, White, Burnett, Hurley,
Banick and Knight
501 City National Bank Building
25 West Flagler Street
Miami, Florida 33130

Re: Rolando Otero vs. Dade County
U. S. District Court Case
No. 77-35-CIV-NCR

Dear Mr. Knight:

Attached for your handling find Summons and Complaint served in the captioned case.

By copy of this to the Public Safety Department and the Corrections and Rehabilitation Department we are asking them to forward any information they have regarding this claim.

Very truly yours,

John M. Gould, Claims Supervisor
Insurance Management Division

JMG/vlj
Attachment

cc: Mr. Royall P. Terry, Jr./with attachment
Police Legal Advisor

Mr. Jack Sandstrom, Director/with attachment
Corrections and Rehabilitation

Mr. William Kearney/with attachment
Admiral Insurance Company

Mr. Robert A. Ginsburg
First Assistant County Attorney
File No.: 77-1068

RECEIVED
MAY 27 1977
POLICE LEGAL UNIT

77-1068

INS (SPL)

United States District Court

FOR THE
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

RECEIVED
MAY 17 1977
OFFICE OF THE MAYOR
DADE COUNTY, FLORIDA

CIVIL ACTION FILE NO. _____

77 35-51-118

ROLANDO OTERO,

Plaintiff

v.

METROPOLITAN DADE COUNTY, et al

Defendant

SUMMONS

To the above named Defendant : METROPOLITAN DADE COUNTY

You are hereby summoned and required to serve upon

Ronald G. Dresnick, Esq. - Defendant's attorney

plaintiff's attorney, whose address is: Suite 800
66 West Flagler Street
Miami, Florida 33130

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Joseph I. Bogert
Clerk of Court.

Charles Lee
Deputy Clerk.

RECEIVED
MAY 13 1977

Date: 5-13-77

[Seal of Court]

COUNTY ATTORNEY

NOTE: This summons is issued pursuant to Rule 4 of the Federal Rules of Civil Procedure.

FEB 3 1977

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

ROLANDO OTERO,

CASE NO. 77-35-CIV-NCR

Plaintiff,

O R D E R

Vs.

METROPOLITAN DADE COUNTY,
Et Al.

Defendants.

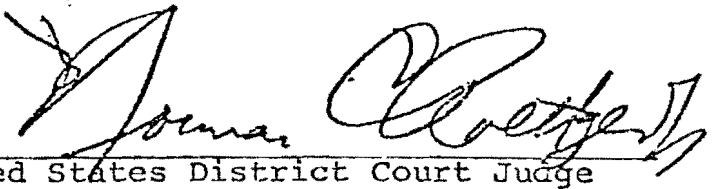
FILED -

77-35-CIV-NCR

THIS CAUSE is before the court on plaintiff's motion
to proceed in forma pauperis.

UPON consideration of the record in this cause, it is
ORDERED AND ADJUDGED that plaintiff's motion to proceed
in forma pauperis is hereby granted and plaintiff may proceed with-
out prepayment of costs or fees or giving security therefore.

DONE AND ORDERED this 1st day of February 1977.


United States District Court Judge

CC: Ronald C. Dresnick, Esq.

IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN
DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NUMBER

ROLANDO OTERO,
Plaintiff,

77 35-67-157

vs.

METROPOLITAN DADE COUNTY,
JACK O. SANDSTROM,
PATRICK C. GALLAGHER,
ROBERT C. HILLMAN,
MARTIN GREEN,
JEFFERY JEWETT,
SERGEANT ALBRITTON,
JOEL KOLKER,
ALBERT SNYDER,
CHARLES DISCHERT,
ALPHONSO MARTORANO,
RICK MASSEY,
SAMUEL CLEARE,
DAVID WASSER,
JOSEPH CHIAPPETTA, and
Various Dade County Correctional
Officers,
Defendants.

FILED BY _____

JAN 5 11 52 AM '87

JOSEPH I BOGGS
CLERK US DISTRICT
SD OF FLA. - MIAMI

VERIFIED COMPLAINT FOR
PERMANENT INJUNCTION
AND DAMAGES

PRELIMINARY STATEMENT

This is an action for injunctive relief, compensatory and punitive damages, attorney's fees and costs against various Dade County Correctional Officers, their supervisors and their employer, Metropolitan Dade County.

JURISDICTION

1. Jurisdiction is conferred in the court by 28 USC 1343 as an action
 - (1) To recover damages for injury to Plaintiff's person, or because of deprivation of any right or privilege of a citizen of the United States by any act done in furtherance of any conspiracy mentioned in 42 USC 1985;
 - (2) To recover damages from any person who fails to prevent or to aid in preventing any wrongs mentioned in 42 USC 1985 which he had knowledge were about to occur and power to prevent;
 - (3) To redress the deprivation under color of any State Law, Statute, Ordinance, Regulation, Custom or usage, or any right, privilege or immunity secured by the Constitution of the United States or by any act of Congress providing for equal rights of citizens or of all persons within the jurisdiction of the United States;

(4) To recover damages or to secure equitable or other relief under any act of Congress providing for the protection of civil rights.

2. This suit is authorized by 42 USC 1981 in that Plaintiff is a person within the jurisdiction of the United States entitled to the same rights and to the full and equal benefits of all laws and proceedings for the security of persons and property as is enjoyed by white citizens and to be subject to like punishment, pains, and penalties . . . of every kind and to no other.

3. This action is also authorized by 42 USC 1983 which allows the Plaintiff, as a person who under color of any statute, ordinance, regulation, custom or usage of any State who has been deprived of rights, privileges, or immunities secured by the United States Constitution by Defendants to sue such Defendants in an action at law or suit in equity.

4. This action is further authorized under 42 USC 1985

(2) Where a conspiracy exists for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any state or territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person to the equal protection of the laws.

(3) Where a conspiracy exists to interfere with a person's civil rights by depriving such person, either directly or indirectly of the equal protection of the laws or of the equal privileges and immunities under the law.

5. Jurisdiction over Defendant Metropolitan Dade County and the other Defendants is authorized by 28 USC §1331 in that the matter in controversy, exceeds the sum of Ten Thousand (\$10,000.00) Dollars, exclusive of interest and costs, and arising under the Constitution, Laws or Treaties of the United States.

6. This Court also has jurisdiction pursuant to the doctrine of pendant jurisdiction.

PARTIES

7. Plaintiff, Rolando Otero is a Cuban born naturalized citizen of the United States and at times pertinent to the facts alleged herein, was incarcerated awaiting trial as a pre-trial detainee at the Pre-Trial Detention Center, 1321 N.W. 13th Street, Miami, Dade County, Florida.

8. Defendant, Metropolitan Dade County, a political subdivision of the State of Florida, at all times pertinent to this Complaint was the employer of Defendants Sandstrom, Gallagher, Hillman, Green, Jewett, Albritton, Snyder, Kolker, Dischert, Martorano, Massey, Cleare, Wasser, Chiappetta, and various other correctional officers.

9. Defendant Jack O. Sandstrom, at all times pertinent to this Complaint was the Director of the Dade County Department of Corrections and Rehabilitation.

10. Defendant Patrick C. Gallagher, at all times pertinent to this Complaint was the Assistant Director of Operations of the Dade County Department of Corrections and Rehabilitation.

11. Defendant Robert C. Hillman, at all times pertinent to this Complaint was the Supervisor of Operations for the Dade County Department of Corrections and Rehabilitation.

12. Defendant Martin Green is a Captain of the Dade County Department of Corrections and Rehabilitation and the Supervisor of the Pre-Trial Detention Center.

13. Defendant Jeffery Jewett, at all times pertinent to this Complaint was a Dade County Correctional Officer.

14. Defendant Sergeant Albritton, at all times pertinent to this Complaint was a Dade County Correctional Officer.

15. Defendant Albert Snyder, at all times pertinent to this Complaint was a Dade County Correctional Officer and a Sergeant for the Dade County Department of Corrections and Rehabilitation.

16. Defendant Joel Kolker, at all times pertinent to this Complaint was a Dade County Correctional Officer.

17. Defendant Charles Dischert, at all times pertinent to this Complaint was a Dade County Correctional Officer.

18. Defendant Alphonso Martorano, at all times pertinent to this Complaint was a Dade County Corrections Officer.

19. Defendant Rick Massey, at all times pertinent to this Complaint was a Dade County Correctional Officer.

20. Defendant Samuel Cleare, at all times pertinent to this Complaint was a Dade County Correctional Officer.

21. Defendant David Wasser, at all times pertinent to this Complaint was a Dade County Correctional Officer.

22. Defendant Joseph Chiappetta, at all times pertinent to this Complaint was a Dade County Correctional Officer.

23. There are other Dade County Correctional Officers, who, at this time are unknown to the Plaintiff, were involved in the wrongs complained of in this Complaint.

FACTUAL ALLEGATIONS

24. Defendant Sandstrom, at all times pertinent to this Complaint was responsible for the formation of the rules and regulations, and policies of the Pre-Trial Detention Center as well as the hiring and training of Dade County Correctional Officers who were employed at the Pre-Trial Detention Center.

25. Defendant Gallagher, at all times pertinent to this Complaint exercised control over all of the operational procedures of the Department of Corrections and Rehabilitation acted for Defendant Sandstrom in his absence, was responsible for the overall processes in the Pre-Trial Detention Center and directed Defendant Hillman to insure that the rules and regulations, procedures and policies promulgated by Defendant Sandstrom were adhered to.

26. Defendant Hillman, at all times pertinent to this Complaint exercised direct control over all operational procedures of the Department of Corrections and Rehabilitation including the Pre-Trial Detention Center, and was responsible to insure that the rules and regulations and policies set forth by Defendant Gallagher were adhered to.

27. Defendant Green, at all times pertinent to this Complaint was the Supervisor of the Pre-Trial Detention Center and responsible for the personnel, assignments, direction, control and supervision of all personnel assigned to the Pre-Trial Detention Center.

28. From on or about May 19, 1976 until August 24, 1976 Plaintiff had been in the continuous custody of the United States Marshall while awaiting and during Plaintiff's trial in United States vs. Rolando Otero before the United States District Court for the Southern District of Florida, Case #75-118-NCR.

29. On August 24, 1976, immediately after being found not guilty of federal charges in the United States vs. Rolando Otero, Plaintiff was arrested by members of the Dade County Public Safety Department for the same offenses for which he had been tried and found not guilty in United States vs. Rolando Otero and in whose continual custody Plaintiff remained until he was booked into the Pre-Trial Detention Center, 1321 N.W. 13th Street, Miami, Dade County, Florida on August 25, 1976 at about 3:00 A.M. Plaintiff was unable to post bond and consequently became a Pre-Trial detainee at the Dade County Pre-Trial Detention

Center.

30. Plaintiff, after being booked into the Pre-Trial Detention Center, and at all times pertinent to this Complaint had not been convicted of any crime, was not sentenced to serve any time in any prison facility, and was in the Pre-Trial Detention Center only by virtue of the fact that he was unable to post a bond.

31. On August 25, 1976, after Plaintiff was booked into the Pre-Trial Detention Center, Defendant Jewett ordered the Plaintiff in the presence of other inmates and correctional officers to remove all of his clothing. Plaintiff complied with Defendant Jewett's request as well as the request that he raise his arms, open his mouth and turn around.

32. Defendant Jewett also ordered Plaintiff to bend over and spread his buttocks apart in the presence of all assembled to which request Plaintiff refused stating that such action was humiliating.

33. Upon Plaintiff's refusal to bend over and spread his buttocks apart Defendant Jewett was joined by Defendants Albritton, Snyder, Kolker, Dischert, and Martorano, all of whom approached the Plaintiff who was standing naked in the presence of said six Defendants.

34. Defendant Albritton again ordered Plaintiff in the presence of all assembled to place his hands on both sides of his buttocks, bend over and spread his buttocks apart.

35. Plaintiff again refused the order stating that such action was humiliating.

36. Plaintiff then requested an attorney, said request was ignored and/or refused and Defendant was not given an opportunity to talk to an attorney.

37. Defendant Albritton advised the Plaintiff that he was going to have to bend over and spread his buttocks apart and that that could be done "either the hard way or the easy way" and said six Defendants began to converge on the Plaintiff.

38. Plaintiff was then without a provocation knocked to the floor, kicked and beaten about his face and body by Defendants Albritton, Jewett, Snyder, Kolker, Dischert, and Martorano.

39. Plaintiff suffered severe physical and emotional pain, suffering and mental anguish as a result of being struck and kicked about the head, face

and body by the aforementioned six Defendants and continues to suffer severe physical and emotional pain, suffering and mental anguish as a result of said beating.

40. Plaintiff was then handcuffed in an unusual and cruel manner, one arm being bent behind his back and the other arm being bent behind his head, left hand and right hand being cuffed to each other so as to cause excruciating pain and continual suffering.

41. Defendant Jewett then handcuffed Plaintiff's feet together and Defendant Jewett lifted the Plaintiff, who was laying naked on the floor by the chain on the cuffs which were attached to Plaintiff's feet while Defendant Kolker supported the rest of Plaintiff's weight by holding one of Plaintiff's arms which was still handcuffed in a tortuous manner, and in the presence of the four other aforementioned Defendants carried and dragged the Plaintiff to the Women's Detention Cell, a considerable distance from where the Plaintiff had been previously beaten and handcuffed.

42. Plaintiff, as a result of the manner in which he was handcuffed and the manner in which he was dragged and carried by the Defendants suffered extreme physical and emotional pain, suffering and mental anguish and continues to suffer physical and emotional pain and mental anguish as a result of the acts of the Defendants.

43. Plaintiff remained in the Women's Detention Cell, naked and handcuffed as alleged above in paragraph 41 for approximately two hours during which time Plaintiff was in great pain and agony and during which time Plaintiff continuously cried out for help and relief.

44. Defendants knew or should have known that Plaintiff was in that condition and position alleged in paragraph 43 above and was in need of help and/or medical attention, but Defendants failed and neglected to provide such help and attention or to remove the handcuffs from Plaintiff's hands or feet.

45. After approximately two hours two Dade County Correctional Officers entered the cell in which the Plaintiff lay, naked and handcuffed hand and foot and ordered Plaintiff to stand. Plaintiff told said Correctional Officers that he was unable to stand because of the cuffs on his hands and feet and because of the excruciating pain which he was suffering at that moment. Said Dade County Correctional Officers pulled on Plaintiff's arm which was handcuffed in the tortuous and cruel manner previously described and lifted Plaintiff to his feet causing

further and additional extreme and excruciating pain and suffering and causing severe mental and emotional distress. Plaintiff continues to suffer physical and emotional pain and suffering and mental anguish as a result of the acts of the aforementioned Dade County Correctional Officers.

46. The handcuffs and foot manacles which were on Plaintiff's hands and feet were removed in the vicinity of the women's detention cell where the Plaintiff had been locked for approximately two hours. Immediately after the handcuffs and manacles were removed from Plaintiff's wrists and ankles, Defendant Rick Massey forced the Plaintiff, who was still naked to walk in the presence of many members of the staff of the Dade County Department of Corrections and Rehabilitation, both men and women, from the women's detention cell located in the north portion of the Pre-Trial Detention Center past the aforementioned male and female staff members to the elevators located in the south portion of the Pre-Trial Detention Center by exerting pressure upon Plaintiff's wrists which had previously been handcuffed in a tortuous, cruel and unusual manner for over two hours.

47. Defendant Rick Massey's action in exerting pressure on Plaintiff's previously injured wrists and forcing the Plaintiff to walk naked in front of the assembled staff caused the Plaintiff to suffer humiliation, severe physical and emotional pain, suffering and mental anguish, said suffering and mental anguish continuing at present and into the future.

48. Plaintiff was transferred to an isolation cell where Plaintiff was left, locked up, without a mattress, soap, toilet paper, blanket, cigarettes, books, towels, shirt, food, toothpaste or toothbrush.

49. The cell into which Plaintiff was locked was poorly lighted, poorly ventilated, inadequately heated and cooled and was likely to be injurious to Plaintiff's health.

50. The cell into which Plaintiff was locked was unsanitary and deprived the Plaintiff of the basic rights of personal hygiene and human dignity.

51. On or about August 25th, 1976, Defendant Jewett approached the isolation cell in which the Plaintiff was locked with Plaintiff's breakfast which he threw at Plaintiff from the other side of the bars causing Plaintiff's breakfast to splatter over Plaintiff and the cell and resulting in considerable mental and emotional anguish to Plaintiff as well as causing pain and suffering, cold pain and suffering and emotional and mental anguish continuing at present

and into the future

52. On or about August 27, 1976 Plaintiff was brought before a disciplinary committee consisting of Defendants Cleare, Wasser and Chiappetta which met for the purpose of recommending what disciplinary action should be taken against Plaintiff for his alleged assault upon Defendant Albritton on or about August 25, 1976 when Plaintiff allegedly struck Defendant Albritton with a shoe while Defendant Albritton was attempting to conduct a strip search of Plaintiff.

53. Defendants Cleare, Wasser and Chiappetta conducted a hearing at which Defendants Jewett, Kolker, Snyder, Dischert and Martorano testified, however Plaintiff was prevented by Defendants Cleare, Wasser and Chiappetta from calling witnesses to testify on his behalf or to prepare an adequate defense for the disciplinary charges against him.

54. The disciplinary committee consisting of Defendants Cleare, Wasser and Chiappetta recommended to the officer in charge of the Pre-Trial Detention Center that Plaintiff be confined to the isolation cell in which Plaintiff had been confined since August 25, 1976 for an additional period of about two weeks.

COUNT I

55. Plaintiff adopts and realleges those allegations set forth in paragraphs 7 through 54.

56. The disciplinary committee consisting of Defendants Cleare, Wasser and Chiappetta at all times pertinent to the allegations of this Complaint were employed by the Dade County Department of Corrections and Rehabilitation and under the direct supervision and control of Defendants Sandstrom, Gallagher, Hillman and Green.

57. The disciplinary committee consisting of Defendants Cleare, Wasser and Chiappetta at all times pertinent to the allegations contained in this Complaint was not an impartial board.

58. Defendants Cleare, Wasser and Chiappetta conspired together for the purpose of impeding, hindering, obstructing or defeating the due course of justice and/or with the intent to deny the Plaintiff the equal protection of the laws and/or for the purpose of injuring Plaintiff in denying the Plaintiff his rights, privileges and immunities as guaranteed under the Constitution of the United States and

59. Defendants Cleare, Wasser and Chiappetta conspired together and/or with Defendants Sandstrom, Gallagher, Hillman and/or Green for the purpose of impeding, hindering, obstructing or defeating the due course of justice and/or with the intent to deny the Plaintiff the equal protection of the laws and/or for the purpose of injuring Plaintiff in denying the Plaintiff his rights, privileges and immunities as guaranteed under the Constitution of the United States and secured to him by the Fourteenth Amendment to the Constitution of the United States to due process and/or equal protection of the laws.

60. As a direct result of the actions of the Defendants aforementioned, Plaintiff suffered physical and emotional pain and mental anguish and continues to suffer and will continue to suffer said physical and emotional pain into the future.

61. As a direct and proximate result of the unlawful acts and omissions of the Defendants complained of herein, Defendants are liable to the Plaintiff for damages in excess of Ten Thousand (\$10,000.00) Dollars.

COUNT II

62. Plaintiff adopts and realleges those allegations set forth in paragraphs 7 through 61.

63. Plaintiff alleges that in doing the acts complained of in paragraphs 7 through 61 above, the Defendants were conspirators engaged in a scheme and conspiracy designed and intended to deny and deprive Plaintiff of the rights, privileges and immunities guaranteed under the Constitution and the Laws of the United States and particularly those hereinabove mentioned and further deprive Plaintiff of equal protection under the law, equal privileges and immunities under the law, due process of the law, the right not to suffer cruel and unusual punishment and the right against unreasonable searches and seizures.

64. As a direct result of the actions of the Defendants aforementioned, Plaintiff suffered physical and emotional pain and mental anguish and continues to suffer and will continue to suffer said physical and emotional pain into the future.

65. As a direct and proximate result of the unlawful acts and omissions of Defendants complained of herein Defendants are liable to the Plaintiff for damages in excess of Ten Thousand (\$10,000.00) Dollars.

COUNT III

66. Plaintiff adopts and realleges those allegations set forth in paragraphs 7 through 65.

67. Plaintiff alleges that in doing the acts and things complained of in paragraphs 7 through 65 above, that Defendants violated the following laws and regulations of the State of Florida.

- a. Florida Statute 784.03(b)
- b. Florida Statute 784.05
- c. Florida Statute 950.09
- d. Florida Statute 951.06
- e. Florida Statute 951.07
- f. Florida Statute 944.36
- g. Chapter 10B-17 of the Rules of the State of Florida Department of Health and Rehabilitative Services particularly:
 1. 10B-17.13(4), (5), (6), (7), (11), (12), (13), (16) and (17)
 2. 10B-17.08(1), 10B-17.07 (10), 10B-17.12(2), 10B-17.13(1) 10B-17.13(23), (24), (25), (26), (27), (28) and (29).

68. As a direct result of the actions of the Defendants aforementioned Plaintiff suffered physical and emotional pain and mental anguish and continues to suffer and will continue to suffer said physical and emotional pain into the future.

69. As a direct and proximate result of the unlawful acts and omissions of the Defendants complained of herein Defendants are liable to the Plaintiff for damages in excess of Ten Thousand (\$10,000.00) Dollars.

COUNT IV

70. Plaintiff adopts and realleges those allegations set forth in paragraphs 7 through 69.

71. Plaintiff alleges that in doing the acts and things complained of in paragraphs 7 through 69 above that the Defendants acted under color of Statute, Ordinance, Regulation, Custom or usage of the State of Florida and deprived Plaintiff of rights, privileges or immunities secured by the Constitution of the United States.

72. As a direct result of the actions of Defendants aforementioned Plaintiff suffered physical and emotional pain and mental anguish and continues to suffer and will continue to suffer said physical and emotional pain into the future.

73. As a direct and proximate result of the unlawful acts and omissions of the Defendants complained of herein, Defendants are liable to the Plaintiff for damages in excess of Ten Thousand (\$10,000.00) Dollars.

COUNT V

74. Plaintiff adopts and alleges those allegations set forth in paragraphs 7 through 73.

75. Plaintiff believes that the acts alleged hereinabove are an ongoing and continuing procedure employed by and engaged in by various Dade County Correctional Officers and that such acts are continuing and will continue into the future.

76. Plaintiff as a proximate result of these acts and of the procedures alleged hereinabove suffered physical and emotional pain and will continue to so suffer.

77. There is no adequate remedy at law to compensate Plaintiff or others similarly situated.

78. The acts alleged hereinabove caused the Plaintiff to suffer irreparable injury and if allowed to continue will cause others situated similarly to Plaintiff to suffer irreparable injury.

WHEREFORE, Plaintiff prays for an immediate injunction against said acts and procedures and a permanent injunction against said acts and procedures.

COUNT VI

79. Plaintiff adopts and realleges those allegations set forth in paragraph 7 through 78.

80. As a proximate result of the acts and procedures set forth hereinabove Defendants are liable to Plaintiff for damages in excess of Ten Thousand (\$10,000.00) Dollars.

COUNT VII

81. Plaintiff adopts and realleges those allegations set forth in paragraph 7 through 80.

82. Defendants committed an assault and battery upon Plaintiff.

83. Plaintiff as a proximate cause of the acts of Defendants as alleged hereinabove has suffered physical and emotional pain and mental anguish and will continue to suffer physical and emotional pain and mental anguish into the future.

84. Defendants are liable to Plaintiff for damages in excess of Ten Thousand (\$10,000.00) Dollars as a result of their acts alleged hereinabove.

COUNT VIII

85. Plaintiff adopts and realleges those allegations set forth in paragraph 7 through 84.

86. Plaintiff at this time is suffering further mental pain and anguish and has been prescribed certain medications for his mental and emotional state however Defendants named herein have refused to allow Plaintiff to take his prescribed medicine.

87. Plaintiff is suffering irreparable injury as a result of the acts or omissions of Defendants herein.

WHEREFORE, Plaintiff prays for an immediate hearing and injunction by this court preventing Defendants from interfering with the medical prescriptions of Plaintiff's doctor.

COUNT IX

88. Plaintiff adopts and realleges those allegations set forth in paragraphs 7 through 87.

89. Defendant Sandstrom knew or should have known of the illegal acts or omissions alleged in paragraphs 7 through 87, however Defendant Sandstrom took no action to alleviate or correct the illegal acts or omissions alleged in the aforementioned paragraphs.

90. As a proximate result of the actions of the Defendant aforementioned Plaintiff suffered physical and emotional pain and mental anguish and continues to suffer and will continue to suffer said physical and emotional pain into the future.

91. As a proximate result of the unlawful acts and omissions of the Defendant complained of herein Defendant is liable to Plaintiff for damages in excess of Ten Thousand (\$10,000.00) Dollars.

COUNT X

92. Plaintiff adopts and realleges those allegations set forth in paragraphs 7 through 91.

93. Defendants Gallagher, Hillmand and Green knew or should have known of the illegal acts or omissions alleged in paragraphs 7 through 91 yet Defendant Gallagher took no action to alleviate or correct the illegal acts or omissions alleged in the aforementioned paragraphs.

94. As a proximate result of the actions of the Defendants aforementioned Plaintiff suffered physical and emotional pain and mental anguish and continues to suffer and will continue to suffer said physical and emotional pain into the future.

95. As a proximate result of the unlawful acts and omissions of the Defendants complained of herein Defendants are liable to Plaintiff for damages in excess of Ten Thousand (\$10,000.00) Dollars.

COUNT XI

96. Plaintiff readopts and realleges those allegations set forth in paragraphs 7 through 95.

97. Plaintiff believes that the unlawful acts alleged hereinabove have happened in the past to others similarly situated to Plaintiff as an ongoing course of conduct and procedure of Defendants in an effort to maintain order and control within the Pre-Trial Detention Center and that said unlawful activity will continue unto the future.

98. Plaintiff, as a direct result of said unlawful activity has suffered physical and emotional pain and mental anguish and will continue to suffer physical and mental pain and anguish into the future.

99. There is no adequate remedy at law to compensate Plaintiff or others similarly situated to Plaintiff against the infliction of said physical and emotional pain and mental anguish.

100. Plaintiff believes the procedures described hereinabove are and will continue to be employed by Defendants named herein so that Plaintiff and other persons similarly situated will continue to be subjected to said unlawful searches and seizures, beatings, assaults, batteries and unlawful disciplinary hearings for which there is no adequate remedy at law.

WHEREFORE, Plaintiff prays this court for the following relief:

1. Entry of a temporary restraining order and a preliminary injunction against the Defendants pending the termination of the cause herein.

2. This court to compel the Defendants to set forth procedures to be approved by this court for:

a. Conducting searches of prisoners entering the jail for the first time.

- b. A statement of rights for pre-trial detainees.
 - c. A procedure to be approved by this court for disciplining of pre-trial detainees if such discipline is to be in excess of mere incarceration while awaiting trial.
3. This court's entry of a final judgment enjoining Defendants from engaging in those activities set forth in this Complaint.
 4. This court's entry of a preliminary injunction enjoining the Defendant from engaging in those activities set forth in this Complaint.
 5. Granting the Plaintiff compensatory damages in excess of Ten Thousand (\$10,000.00) Dollars and punitive damages of Ten Million (\$10,000,000.00) Dollars.
 6. Allow the Plaintiff his costs in attorney's fees and grant such further and other alternative relief which may appear to the court to be just and equitable.

RONALD C. DRESNICK

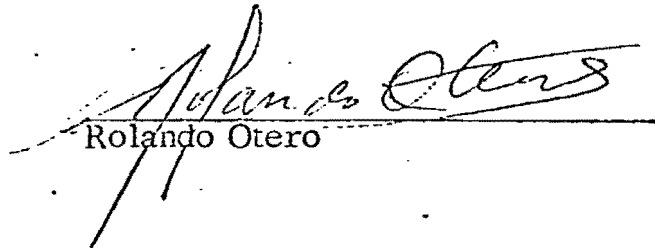
Ronald C. Dresnick
Attorney for Plaintiff
Suite 800 - Concord Building
66 West Flagler Street
Miami, Florida 33130 (377-2541)

STATE OF FLORIDA,
COUNTY OF DADE.

§

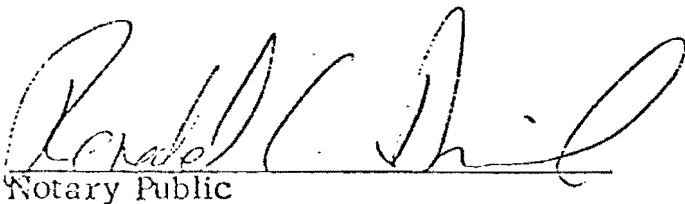
BEFORE ME, the undersigned authority, personally appeared ROLANDO OTERO, who, after being duly sworn under oath, deposes and states that:

1. Your Affiant is the Plaintiff, Rolando Otero in the above styled cause.
2. Your Affiant has read the attached complaint for permanent injunction and damages, and with respect to those allegations, and facts alleged herein, believes same to be true except for those allegations which are alleged to be upon information and belief, and as to those allegations, your Affiant believes same to be true to the best of his knowledge, information and belief.
3. FURTHER AFFIANT SAYETH NAUGHT.



Rolando Otero

SWORN TO and subscribed before
me this 29 day of December, 1976..



Notary Public

NOTARY PUBLIC STATE OF FLORIDA AT LARGO
MY COMMISSION EXPIRES SEPT 6 1978
BONDED THRU GENERAL INS. UNDERWRITERS

RECEIVED

MAY 19 1977

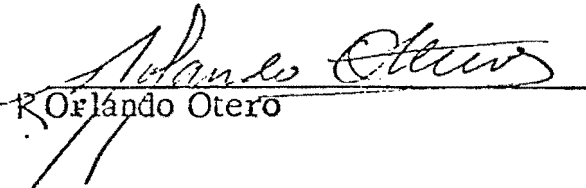
INSURANCE MANAGEMENT

FORMA PAUPERIS AFFIDAVIT

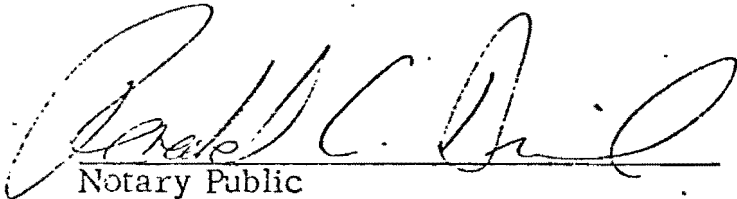
BEFORE ME, the undersigned authority personally appeared Orlando Otero who, after being duly sworn, deposes and says:

1. Your Affiant lacks funds sufficient to pre-pay the filing fee for the prosecution of this cause.
2. Your Affiant has not, for the purpose of avoiding payment of said cost divested himself of any property, monies or things of value.

FURTHER AFFIANT SAYETH NAUGHT.


Orlando Otero

SWORN TO and subscribed before
me this 29 day of December, 1976.


Notary Public

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES SEPT. 6 1980
BONDED THRU GENERAL INS. UNDERWRITERS

77-1068

INS (SPL)
CIV. 1a (2-44)
(Formerly D. C. Form No. 45a Rev. (6-1977))

SUMMONS IN A CIVIL ACTION

United States District Court

FOR THE
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

RECEIVED
MAY 17 1977
OFFICE OF THE MAYOR
DADE COUNTY, FLORIDA

CIVIL ACTION FILE NO. _____

77 35-61-103

ROLANDO OTERO,

67 FOR THE COUNTY ATTORNEY DADE COUNTY FLORIDA	Plaintiff v. METROPOLITAN DADE COUNTY, et al. Defendant	CIVIL ACTION FILE NO.	SUMMONS	ATTACHED FOR SERVICE
--	--	--------------------------	---------	----------------------

To the above named Defendant : METROPOLITAN DADE COUNTY

You are hereby summoned and required to serve upon

Ronald C. Dresnick, Esq.

plaintiff's attorney, whose address is: Suite 800
66 West Flagler Street
Miami, Florida 33130

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

Joseph I. Bogart
Clerk of Court.
Clark Lee
Deputy Clerk.
[Seal of Court]

RECEIVED
MAY 18 1977

Date: 5-13-77

COUNTY ATTORNEY

NOTE:—This summons is issued pursuant to Rule 4 of the Federal Rules of Civil Procedure.

FEB 3 1977

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

ROLANDO OTERO,

CASE NO. 77-35-CIV-NCR

Plaintiff,

O R D E R

Vs.

METROPOLITAN DADE COUNTY,
Et Al.

FILED -

Defendants.

77-35-CIV-NCR

THIS CAUSE is before the court on plaintiff's motion
to proceed in forma pauperis.

UPON consideration of the record in this cause, it is

ORDERED AND ADJUDGED that plaintiff's motion to proceed
in forma pauperis is hereby granted and plaintiff may proceed with-
out prepayment of costs or fees or giving security therefore.

DONE AND ORDERED this 1st day of February 1977.

United States District Court Judge

cc: Ronald C. Dresnick, Esq.



METROPOLITAN DADE COUNTY - FLORIDA

INSURANCE MANAGEMENT DIVISION
12th Floor
140 West Flagler Street
Miami, Florida 33130
579-5138

GENERAL SERVICES ADMINISTRATION

May 25, 1977

Mr. Phillip W. Knight
Fowler, White, Burnett, Hurley,
Banick and Knight
501 City National Bank Building
25 West Flagler Street
Miami, Florida 33130

Re: Rolando Otero vs. Dade County
U. S. District Court Case
No. 77-35-CIV-NCR

Dear Mr. Knight:

Attached for your handling find Summons and Complaint served in the captioned case.

By copy of this to the Public Safety Department and the Corrections and Rehabilitation Department we are asking them to forward any information they have regarding this claim.

Very truly yours,

John M. Gould, Claims Supervisor
Insurance Management Division

JMG/vlj
Attachment

cc: Mr. Royall P. Terry, Jr./with attachment
Police Legal Advisor

Mr. Jack Sandstrom, Director/with attachment
Corrections and Rehabilitation

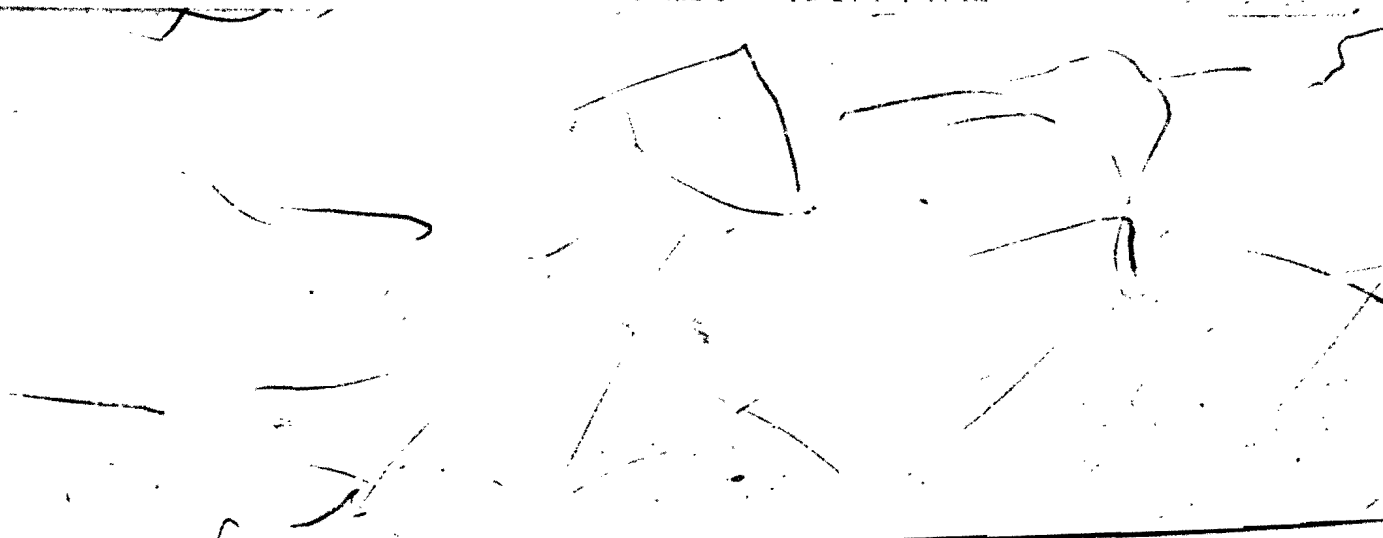
Mr. William Kearney/with attachment
Admiral Insurance Company

Mr. Robert A. Ginsburg
First Assistant County Attorney
File No.: 77-1068

RECEIVED
MAY 27 1977

POLICE LEGAL UNIT

* 10/1



MEMORANDUM

107.07-17A

TO Richard D. Smith, Captain
Internal Review Section

DATE May 27, 1977

FROM Royall P. Terry, Jr.
Police Legal Advisor

SUBJECT Rolando Otero v.
Metropolitan Dade
County

Attached find summons and complaint served on Metropolitan Dade County received by this office. No prior notice of claim has been received by this office.

Please initiate an investigation into this matter and forward us your report.

RPT/ks
Attachment

MEMORANDUM

107.07-17A

TO Royall P. Terry, Jr.
Police Legal Advisor

DATE July 8, 1977

FROM *RPT*
Capt. Richard D. Smith, Supervisor
Internal Review Section

SUBJECT Rolando Otero v. *(DOB)*
Metropolitan Dade
County
L.I. Case #77-271

Det. Antonio Prieto *AP*

On May 27, 1977, PSD Internal Review Section received a copy of Complaint for Permanent Injunction and Damages from Mr. Ronald C. Dresnick, attorney representing Mr. Rolando Otero. According to the complaint, Mr. Dresnick claims numerous inproprieties conducted by members of the Dade County Corrections and Rehabilitation Department. Furthermore, Mr. Dresnick never mentioned any PSD officers in his complaint except for the fact that he stated that on August 24, 1976, members of the Public Safety Department arrested Mr. Rolando Otero. (No allegations were made against any PSD member or the department.)

On June 10, 1977, this investigator reviewed Mr. Otero's rap sheet. Mr. Otero was arrested by Sgt. R. Diaz and Det. Benitez from PSD Organized Crime Bureau on August 24, 1976, for possession of explosives (nine counts), arson (nine counts), discharging a destructive device (nine counts). Later, on August 25, 1976, Mr. Otero had an altercation while at the Dade County Jail and was charged with aggravated battery by Det. King. (PSD General Investigation Unit, Central District.)

On June 13, 1977, this investigator spoke to Sgt. Diaz and Det. Benitez who stated that Mr. Otero was found guilty of five of the above mentioned charges. Also on June 13, 1977, this investigator spoke to Capt. Martin Green, Dade County Corrections and Rehabilitation Department, who stated that Mr. Otero's charges of aggravated battery against Correctional Officers were dismissed by the State Attorney's Office.

On June 13, 1977, Mr. Ronald C. Dresnick stated that he is not suing, nor is he planning to sue, Public Safety Department and that we are not involved in this matter. Mr. Dresnick finally stated that the summons, order, and complaint from Mr. Rolando Otero were probably sent to PSD by mistake. Mr. Dresnick further added that if this investigator wanted some additional information in this case, to contact Mr. Boyd from the County Attorney's Office.

Royall P. Terry, Jr.

- 2 -

July 8, 1977

This investigator tried to contact Mr. Boyd with negative results. At this time, this investigator is respectfully requesting that his investigation be considered closed.

For further information, please contact this investigator.

AP/cr

MEMORANDUM

107.07-17A

TO **L. C. Cantin**
Insurance Management Division

FROM **ROYALL P. TERRY JR.**
Royall P. Terry, Jr.
Police Legal Advisor
Police Legal Unit

DATE **July 21, 1977**

SUBJECT **L.I./I.R. Case #77-271**
Rolando Otero v. Dade
County

A copy of the subject investigation conducted by the Internal Review Section is attached.

RPT/cr
Attachment (1) 77-271

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE SOUTHERN DISTRICT
OF FLORIDA

No. 77-35-Civ-WMH

ROLANDO OTERO,
Plaintiff,

vs

METROPOLITAN DADE COUNTY,
et al.,

Defendants,

INTERROGATORIES TO METROPOLITAN
DADE COUNTY

Plaintiff, through counsel, directs the following interrogatories to Metropolitan Dade County to be answered under oath and in compliance with Rule 33, Fed. R. Vic. P.:

1. Identify the person answering these interrogatories on behalf of Metropolitan Dade County, including name, business and residence addresses, and title or position.

2. State the last known address for Defendant Jewett herein as reflected by the records of Dade County or any of its divisions. In your answer, identify the records from which your answer was obtained.

3. State all former addresses for Defendant Jewett as reflected by your records; in your answer identify all records from which your answer is derived.

4. Is Defendant Jewett still employed by you? If not, state the date on which he became unaffiliated with you, and all reasons for his becoming disaffiliated.

5. Does Defendant Jewett follow a regular course, or beat, or, geographical area or activities in his duties on your behalf? If so, state with specificity the streets, blocks and areas covered by Jewett as well as the times of day when he may be found at any particular location on any given day on a regular basis.

6. Does Defendant Jewett report physically (in person) on a regular basis to any office of Dade County? If not, state on what basis said Defendant does personally report in person. If so, state all such office addresses and, for each such address, state the time of day he so reports and the names and addresses of all of your personnel to whom he then and there reports.

DRESNICK & FREEMAN
Attorney for Plaintiff
800 Concord Building
66 West Flagler Street
Miami, Florida 33130
Telephone: 377-0034

RONALD DRESNICK

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was mailed to Fred Ober, Esquire, 25 West Flagler Street, Miami, Florida, this _____ day of August, 1979.

RONALD DRESNICK

LAW OFFICES

FOWLER, WHITE, BURNETT, HURLEY, BANICK & KNIGHT

A PROFESSIONAL ASSOCIATION

MORRIS E. WHITE
HENRY BURNETT
JAMES L. HURLEY
RICHARD S. BANICK
PHILLIP W. KNIGHT
WILLIAM C. NORWOOD
HAROLD L. WARD
JOHN C. STRICKROOT
GEORGE B. FOSS, JR.
FRANK J. MARSTON
A. BLACKWELL STIEGLITZ
FRED R. OBER
MICHAEL J. CAPPUCIO
CHARLES L. HUME

STUART H. ALTMAN
JOHN R. KELSO
GREG M. GAEBE
KARL CONNELL
WILLIAM B. MILLIKEN
RONALD P. WEIL
ALAN S. FOGG, JR.
THOMAS F. MARTIN
C. DOUGLAS SKINNER
A. RODGER TRAYNOR, JR.
CURTIS CARLSON
MICHAEL J. MURPHY
WILLIAM MCCARTHY

CODY FOWLER
(1892-1978)

WALTER HUMKEY
(1912-1974)

FIFTH FLOOR
CITY NATIONAL BANK BUILDING
25 WEST FLAGLER STREET
MIAMI, FLORIDA 33130

TELEPHONE (305) 358-6550
CABLE ADDRESS: "FOWHITE"
TELEX: "519-215 CITNABANK MIA"

September 4th, 1979

Mr. John L. Wills
Claims Supervisor
Metropolitan Dade County
Tort Claims Unit, 12th Floor
140 West Flagler Street
Miami, Florida 33130

Re: Otero v. Dade County
Our File No: 14666FRO

Dear John:

The attached Interrogatories have been submitted to Dade County.

Please do the necessary to obtain the information called for,
so that we may prepare answers thereto.

Very truly yours,

Fred R. Ober

FRO/mb

September 10, 1979

Fred R. Ober, Esquire
Fowler, White, Burnett, Hurley, Banick & Knight, P. A.
Fifth Floor, City National Bank Building
25 West Flagler Street
Miami, Florida 33130

re: Otero v. Dade County
Your File No: 14666FRO

Dear Fred:

I have forwarded the Interrogatories in reference to the whereabouts of Officer Jewett to Albert K. Antonio, Police Legal Adviser. He is most cooperative and I am sure will forward the information necessary within a relatively short period of time.

I do note that a Jurat was not forwarded with the Interrogatories and so was unable to forward same to Mr. Antonio.

If you care to forward a Jurat, please do so; otherwise, I can sign the Interrogatories based upon my knowledge and belief.

Sincerely,

John L. Wills
Claims Supervisor
Insurance & Risk Management Division

cc:A. K. Antonio, Police Legal Adviser
JLW:ba

RECEIVED
SEP 12 1979
POLICE LEGAL UNIT

MEMORANDUM

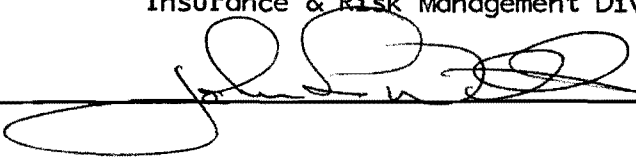
107.07-17 A

TO Albert K. Antonio
Police Legal Adviser

DATE September 10, 1979

SUBJECT Otero V. Dade County
D/I: 8-24-76

FROM John L. Wills, Claims Supervisor
Insurance & Risk Management Division



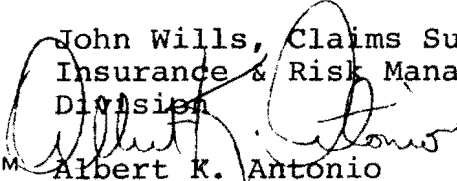
I enclose herewith a set of Interrogatories together with a carbon copy of the cover letter of Fred Ober who is representing the County in this matter. As you can see, the Interrogatories are directed to the whereabouts of Office Jeffery Jewett whom plaintiffs have apparently been unable to serve in this matter.

Please obtain the information requested in these Interrogatories and return same to me as soon as is practicable.

Enclosures
JLW:ba

MEMORANDUM

107.07-17A

TO John Wills, Claims Supervisor
Insurance & Risk Management
Division
FROM  Albert K. Antonio
Police Legal Advisor

DATE September 13, 1979
SUBJECT Otero v Dade County
D/I: 8-24-76

Please be advised that Jeffrey Jewett is not a PSD employee.
It would appear from our file that he is probably employed
at the Department of Corrections and Rehabilitation.

AKA/tad