

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

**CHRISTOPHER J. SQUITIERI,
JOHN HORNING,
ANTHONY PEARN,
JAMES STEFFENS,
CHRISTOPHER STARNES,
CHERYL HAZELTON,
NIKOLAUS KRIZ,
AARON ZIEGLER,
SHANE METZLER,
ROYCE RODGERS,
CLIFF BALTZER,
SEAN GIBSON,
BRYAN SIKES,
EDWARD LAPE,
BRANDON MARCHIONE,
DEAN MARIANI,
RICHARD BYNUM,
CHARLES KEPPEL, JR.,
NICHOLAS SCRIMA,
BRIAN KOZERA,**

Plaintiffs,

V.

Case No. 8:19-CV-906

**PASCO COUNTY SHERIFF, CHRISTOPHER NOCCO;
COLONEL JEFFREY HARRINGTON;
MAJOR MELBOURNE “Mel” EAKLEY, MAJOR OF PATROL OPERATIONS;
MAJOR JEFFREY PEAKE, MAJOR CRIMES UNIT;
LARRY KRAUS, DIRECTOR OF INTELLIGENCE LEAD POLICING UNIT;
MAJOR KEN GREGORY, MAJOR OF PATROL OPERATIONS;
CAPTAIN SHARON FOSHEY, DIRECTOR OF PASCO HERNANDO POLICE
ACADEMY;
SERGEANT JAMES BROWNING;
SERGEANT RICHARD JONES;
SERGEANT MARC ERICKSON;
CORPORAL JENNIE JONES, COORDINATOR OF PASCO HERNANDO POLICE
ACADEMY;
INSPECTOR JENNIFER CHRISTENSEN;
HUMAN RESOURCES DIRECTOR TAFFINI REED;
INVESTIGATOR TIMOTHY ROY;
HUMAN RESOURCES MANAGER MELISSA HITE;**

**HUMAN RESOURCES SPECIALIST CHRISTOPHER BENNETT;
LIEUTENANT STEVEN FRICK, DISTRICT TWO PATROL;
CAPTAIN JOSEPH IRIZARRY;
CORPORAL ERNIE FONTAN;
LIEUTENANT CLINTON CABBAGE;
SERGEANT KEITH MCCARTHY;
CORPORAL DUSTIN BROOKS;
CAPTAIN TAIT SANBORN;
LIEUTENANT ROBERT TEDESCHI;
SERGEANT ROBERT MEDINA;
LIEUTENANT JAY GALASSI;
SERGEANT CLINT MILLER;
SERGEANT KEVIN MACUMBER;
CHIEF GEORGE MCDONALD;
LIEUTENANT GARY RAULERSON;
SERGEANT BENJAMIN BIRGE;
CAPTAIN JAMES MALLO;
CAPTAIN JACK ARMSTRONG;
SERGEANT MICHAEL SHOUP;
CAPTAIN WILLIAM DAVIS;
CAPTAIN MICHAEL FARRANTELLI;
MAJOR STACY JENKINS;
CAPTAIN RAY REVELL;
LIEUTENANT JOHN COLLIER;
SERGEANT WILL FERGUSON;
LIEUTENANT CHRISTOPHER JOYAL;
MAJOR ED BECKMAN;
LIEUTENANT RICHARD BAIN;
SERGEANT ROBERT LOWRY;
ADMINISTRATIVE LIEUTENANT WARREN JONES;**

Defendants.

AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiffs, CHRISTOPHER J. SQUITIERI (hereinafter “SQUITIERI”), JOHN HORNING (hereinafter “HORNING”), ANTHONY PEARNS (hereinafter “PEARNS”), JAMES STEFFENS (hereinafter “STEFFENS”), CHRISTOPHER STARNES (hereinafter “STARNES”), CHERYL HAZELTON (hereinafter “HAZELTON”), NIKOLAUS KRIZ (hereinafter “KRIZ”), AARON ZIEGLER (hereinafter “ZIEGLER”), SHANE METZLER

(hereinafter “METZLER”), ROYCE RODGERS (hereinafter “RODGERS”), CLIFF BALTZER (hereinafter “BALTZER”), SEAN GIBSON (hereinafter “GIBSON”), BRYAN SIKES (hereinafter “SIKES”), EDWARD LAPE (hereinafter “LAPE”), BRANDON MARCHIONE (hereinafter “MARCHIONE”), DEAN MARIANI (hereinafter “MARIANI”), RICHARD BYNUM (hereinafter “BYNUM”), CHARLES KEPPEL, JR (hereinafter KEPPEL”), NICHOLAS SCRIMA (hereinafter “SCRIMA”) and BRIAN KOZERA (hereinafter “KOZERA”), by and through their undersigned attorney, files this Amended Complaint and Demand for Jury Trial, individually and on behalf of a class, bringing this action against Defendants, PASCO COUNTY SHERIFF, CHRISTOPHER NOCCO (hereinafter “NOCCO”); Colonel JEFFERY HARRINGTON (hereinafter “HARRINGTON”); Major MELBOURNE “Mel” EAKLEY (hereinafter “EAKLEY”), Major of Patrol Operations; Major JEFFERY PEAKE (hereinafter “PEAKE”), Major of Crimes Unit; LARRY KRAUS (hereinafter “KRAUSE”), Director of Intelligence Lead Policing Unit; Major KENNETH GREGORY (hereinafter “GREGORY”), Major of Patrol Operations; Captain SHARON FOSHEY (hereinafter “FOSHEY”), Director of Pasco Hernando Police Academy; Sergeant JAMES BROWNING (hereinafter “BROWNING”); Sergeant RICHARD JONES (hereinafter “SGT. JONES”); Sergeant MARC ERICKSON (hereinafter “ERICKSON”); Corporal JENNIE JONES (hereinafter “CORP. JONES”), Coordinator of Pasco Hernando Police Academy; Inspector JENNIFER CHRISTENSEN (hereinafter “CHRISTENSEN”); Human Resources Director TAFFINI REED (hereinafter “REED”); Investigator TIMOTHY ROY (hereinafter “ROY”); Human Resources Manager MELISSA HITE (hereinafter “HITE”); Human Resources Specialist CHRISTOPHER BENNETT (hereinafter “BENNETT”); Lieutenant STEVEN FRICK (hereinafter “FRICK”), District Two Patrol; Captain JOSEPH IRIZARRY(hereinafter

“IRIZARRY”); Corporal ERNIE FONTAN (hereinafter “FONTAN”); Lieutenant CLINTON CABBAGE(hereinafter “CABBAGE”); Sergeant KEITH MCCARTHY (hereinafter “MCCARTHY”); and Corporal DUSTIN BROOKS (hereinafter “BROOKS”); Captain TAIT SANBORN (hereinafter “SANBORN”); Lieutenant ROBERT TEDESCHI (hereinafter “TEDESCHI”); Sergeant ROBERT MEDINA (hereinafter “MEDINA”); Lieutenant JAY GALASSI (hereinafter “GALASSI”); Sergeant CLINTON MILLER (hereinafter “MILLER”); Sergeant MACUMBER (hereinafter “MACUMBER”); Chief GEORGE MCDONALD (hereinafter “MCDONALD”); Lieutenant RAULERSON (hereinafter “RAULERSON”); Sergeant BENJAMIN BIRGE (hereinafter “BIRGE”); Captain JAMES MALLO (hereinafter “MALLO”);Captain JACK ARMSTRONG (hereinafter “ARMSTRONG”); Sergeant MICHAEL SHOUP (hereinafter “SHOUP”); Captain WILLIAM DAVIS (hereinafter “DAVIS”); Captain MICHAEL FARRANTELLI (hereinafter “FARRANTELLI”); Major STACY JENKINS (hereinafter “JENKINS”); Captain RAY REVELL (hereinafter ‘REVELL”); Lieutenant JOHN COLLIER (hereinafter “COLLIER”); Sergeant WILL FERGUSON (hereinafter “FERGUSON”); Lieutenant CHRISTOPHER JOYAL (hereinafter “JOYAL”); MAJOR ED BLACKMAN (hereinafter “BLACKMAN”); Lieutenant RICHARD BAIN (hereinafter “BAIN”); Sergeant ROBERT LOWRY (hereinafter “LOWRY”) and ADMINISTRATIVE LIEUTENANT WARREN JONES (hereinafter “LIEUTENANT JONES”), alleges upon facts and belief as follows:

I. SUMMARY OF CLAIMS

This is a Civil RICO claim which requires Plaintiffs to demonstrate that the Defendants have engaged in a “pattern” of misconduct (called “racketeering” under the RICO statutes). A

“Pattern of racketeering activity” requires that at least two acts of racketeering activity are committed within ten (10) years of each other.

The Civil Action for RICO is defined in 18 U.S.C.A. § 1964 (c): “Any person injured in his business or property by reason of a violation of section 1962 of this chapter may . . . recover threefold the damages he sustains and the cost of the suit, including a reasonable attorney’s fee” Section 1962 has four (4) subparts and generally prohibits the use of income obtained from a pattern of racketeering activity or through collection of an unlawful debt to purchase, establish, operate, or participate in the affairs of any enterprise in interstate or foreign commerce. Florida’s RICO Act mirrors the Federal RICO Act. To be convicted for a violation of the State RICO Act, the Defendant must have been arrested because he or she was associated with an enterprise, he or she directly or indirectly was part of the enterprise as evidenced by participating in a minimum of two (2) acts of racketeering activity and at least two (2) of the acts of racketeering activities had commonalities. Potential commonalities include the same or similar victims, co-conspirators, methods of commission, intent, results or other characteristics that established a pattern.

In this particular case, there are twenty (20) Plaintiffs and one (1) confidential informant, all of whom have had civil violations that constitute Civil RICO claims against them by Defendants. The Plaintiffs’ individual experiences of intimidation, coercion, extortion and other unethical behavior by their supervisors at the Pasco Sheriff’s Office is well documented in the body of the Complaint.

The confidential informant provides supporting evidence of the patterns of abuse of power, intimidation, and coercion to perform unethical activities at the behest of superiors that are similar to the narratives of the twenty (20) Plaintiffs. Taken together, the Plaintiffs, and confidential informant, provides a picture of the Pasco Sheriff’s Office that is criminal and

unethical, making it a criminal enterprise. This pattern of behavior reflects an attitude on the part of the Defendants that they, as law enforcement officers, are above the law and immune from scrutiny or the most innocuous criticism.

The Plaintiffs, and confidential informant, demonstrate what life is like when someone decides to contradict, or simply not follow, the edicts of the highest officials within the Pasco Sheriff's Office. Their stories depict a Sheriff's Office whose leadership is intoxicated with power and will physically abuse, intimidate, incarcerate, extort, and defame in order to ensure their absolute control and ensure a reign of terror both within the Pasco Sheriff's Office and throughout Pasco County.

When the Defendants did not get what they wanted, they retaliated against the Plaintiffs and confidential informant with internal departmental investigations intended to ruin their careers and in some instances, prevent them from gaining employment with any other law enforcement agency. The confidential informant was the subject of psychological abuse in order to intimidate him/her. He/she was subjected to sexually derogatory comments and demotions. In some instances, witnesses against the Plaintiffs, and confidential informant, were encouraged to lie and/or change fact patterns in order to vilify them.

These behavioral patterns of abuse by top officials of the Pasco Sheriff's Office, including the Sheriff himself, are so commonplace and rampant that they are standard operating procedure both presently and for the foreseeable future. The traditional social compact which ensures the protection of individuals living in a community by a governmental agency as long as that governmental agency acts equitably, justly, and according to the laws of the State, has been irretrievably broken by the actions of the Defendants.

The Pasco Sheriff's Office employs about seven hundred fifty (750) sworn members, Sheriff's Deputies and Corrections Deputies, and about six hundred fifty (650) civilians, who carry out the official business of enforcing the laws of the State of Florida, in and for Pasco County, Florida. Pasco Sheriff's Office is the largest law enforcement agency within Pasco County, Florida, and serves as a full service law enforcement and detention agency for the more than five hundred twelve thousand (512,000) citizens of Pasco County Florida.

1.

Defendants have, through the Pasco Sheriff's Office, engaged in "racketeering activity" through: (A) acts or threats involving, bribery and extortion, which is chargeable under State Law and punishable by imprisonment for more than one year; and, (B) bribery-Section 201 and Section 664, Mail fraud-section 1341, Wire fraud-Section 1343, Obstruction of Justice-Section 1503, Obstruction of Criminal Investigations-Section 1510, Obstruction of State or Local Law Enforcement-Section 1511, Tampering with a Witness, Victim, or an Informant-Section 1512, Retaliating Against a Witness, Victim, or an Informant-Section 1513, Peonage, Slavery, and Trafficking in Persons-Sections 1581-1592, and Racketeering-Section 1952.

2.

Defendants' conduct violates the Federal Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961 et seq. ("Federal RICO"), and Florida's Racketeering Statute, Chapter 895 et seq. (Florida "RICO"), as more fully set forth below.

3.

The conduct of all of the Defendants listed above is in violated 42 U.S. Code § 1985, Conspiracy to Interfere with Civil Rights.

4.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN, REED, ROY, KRAUS, HITE, and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' conduct violated the Trafficking Victims Protection Act, 42 U.S.C. § 7102.

5.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN, REED, ROY, KRAUS, HITE, and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' conduct violated the Federal whistle Blower Act, Whistleblower Protection Act of 1989, 5 U.S.C. 2302et seq., (federal Whistle Blower), and Fla. Stat. § 112.3187et seq.

II. CONFIDENTIAL INFORMANT

6.

Confidential Informant:

Informant was targeted and profiled by the Pasco Sheriff's Office Intelligent Led Policing Unit after he/she posted comments on Facebook during Defendant, NOCCO's election campaign. The informant was arrested on numerous false charges and the Defendant, NOCCO, as well as other Executive and Non-Executive Pasco Sheriff's Office Staff utilized Florida

Department of Children and Families Investigators to pursue false child abuse claims against him/her.

7.

In addition, he/she was picked up by Deputies and threatened to be charged with threatening a public official, Defendant, NOCCO and then released without being charged. This was strictly an intimidation tactic and misuse of power by the Defendant, NOCCO.

8.

The State Attorney's Office failed to file any charges due to insufficient evidence for prosecution. The informant was forced to relocate out of the state in fear of corruption, retaliation, and fear for his/her own life as well as his/her family's life. The on-going pressure from the Pasco Sheriff's Office was overwhelming due to his/her right of free speech and supporting comments that did not support Defendant, NOCCO. His/her attorney advised him/her it was in his/her best interest to safely move his/her family out of the area due to the overwhelming corruption and targeting that would continue by the Pasco Sheriff's Office.

III. PARTIES, JURISDICTION AND VENUE

9.

Plaintiff, CHRISTOPHER J. SQUITIERI is a citizen of Florida and resides in the Middle District of Florida.

10.

Plaintiff, JOHN HORNING is a citizen of Florida and resides in the Middle District of Florida.

11.

Plaintiff, ANTHONY PEARN is a citizen of Florida and resides in the Middle District of Florida.

12.

Plaintiff, JAMES STEFFENS is a citizen of Florida and resides in the Middle District of Florida.

13.

Plaintiff, CHRISTOPHER STARNES is a citizen of Florida and resides in the Middle District of Florida.

14.

Plaintiff, CHERYL HAZELTON was a citizen of Florida and resided in the Middle District of Florida during the relevant times alleged in this suit.

15.

Plaintiff, NIKOLAUS KRIZ is a citizen of Florida and resides in the Middle District of Florida.

16.

Plaintiff, AARON ZIEGLER is a citizen of Florida and resides in the Middle District of Florida.

17.

Plaintiff, SHANE METZLER is a citizen of Florida and resides in the Middle District of Florida.

18.

Plaintiff, ROYCE RODGERS is a citizen of Florida and resides in the Middle District of Florida.

19.

Plaintiff, CLIFF BALTZER is a citizen of Florida and resides in the Middle District of Florida.

20.

Plaintiff, SEAN GIBSON is a citizen of Florida and resides in the Middle District of Florida.

21.

Plaintiff, BRYAN SIKES is a citizen of Florida and resides in the Middle District of Florida.

22.

Plaintiff, EDWARD LAPE is a citizen of Florida and resides in the Middle District of Florida.

23.

Plaintiff, BRANDON MARCHIONE is a citizen of Florida and resides in the Middle District of Florida.

24.

Plaintiff, DEAN MARIANI is a citizen of Florida and resides in the Middle District of Florida.

25.

Plaintiff, RICHARD BYNUM is a citizen of Florida and resides in the Middle District of Florida.

26.

Plaintiff, CHARLES KEPPEL JR., is a citizen of Florida and resides in the Middle District of Florida.

27.

Plaintiff, NICHOLAS SCRIMA is a citizen of Florida and resides in the Middle District of Florida.

28.

Plaintiff, BRIAN KOZERA is a citizen of Florida and resides in the Middle District of Florida.

29.

Defendant, PASCO COUNTY SHERIFF, CHRISTOPHER NOCCO is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

30.

Defendant, PASCO COUNTY SHERIFF COLONEL, JEFFREY HARRINGTON is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

31.

Defendant, PASCO COUNTY SHERIFF MAJOR, MELBOURNE “Mel” EAKLEY is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

32.

Defendant, PASCO COUNTY SHERIFF MAJOR, JEFFREY PEAKE is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

33.

Defendant, PASCO COUNTY SHERIFF DIRECTOR, LARRY KRAUS is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

34.

Defendant, PASCO COUNTY SHERIFF MAJOR, KEN GREGORY is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

35.

Defendant, PASCO COUNTY SHERIFF CAPTAIN, SHARON FOSHEY is a citizen of Florida, resides in the Middle District of Florida and is being sued in her official and individual capacity.

36.

Defendant, PASCO COUNTY SHERIFF SERGEANT, JAMES BROWNING is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

37.

Defendant, PASCO COUNTY SHERIFF SERGEANT, RICHARD JONES is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

38.

Defendant, PASCO COUNTY SHERIFF SERGEANT, MARC ERICKSON is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

39.

Defendant, PASCO COUNTY SHERIFF CORPORAL, JENNIE JONES is a citizen of Florida, resides in the Middle District of Florida and is being sued in her official and individual capacity.

40.

Defendant, PASCO COUNTY SHERIFF INSPECTOR, JENNIFER CHRISTENSEN is a citizen of Florida, resides in the Middle District of Florida and is being sued in her official and individual capacity.

41.

Defendant, PASCO COUNTY SHERIFF HUMAN RESOURCES DIRECTOR, TAFFINI REED is a citizen of Florida, resides in the Middle District of Florida and is being sued in her official and individual capacity.

42.

Defendant, PASCO COUNTY SHERIFF INVESTIGATOR, TIMOTHY ROY is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

43.

Defendant, PASCO COUNTY SHERIFF HUMAN RESOURCES MANAGER, MELISSA HITE is a citizen of Florida, resides in the Middle District of Florida and is being sued in her official and individual capacity.

44.

Defendant, PASCO COUNTY SHERIFF HUMAN RESOURCES SPECIALIST, CHRISTOPHER BENNETT is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

45.

Defendant, PASCO COUNTY SHERIFF LIEUTENANT, STEVEN FRICK is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

46.

Defendant, PASCO COUNTY SHERIFF CAPTAIN, JOSEPH IRIZARRY is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

47.

Defendant, PASCO COUNTY SHERIFF COPORAL, ERNIE FONTAN is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

48.

Defendant, PASCO COUNTY SHERIFF LIEUTENANT, CLINTON CABBAGE is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

49.

Defendant, PASCO COUNTY SHERIFF SERGEANT, KEITH MCCARTHY is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

50.

Defendant, PASCO COUNTY SHERIFF CORPORAL, DUSTIN BROOKS is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

51.

Defendant, PASCO COUNTY SHERIFF CAPTAIN TAIT SANBORN is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

52.

Defendant, PASCO COUNTY SHERIFF LIEUTENANT ROBERT TEDESCHI is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

53.

Defendant, PASCO COUNTY SHERIFF SERGEANT ROBERT MEDINA is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

54.

Defendant, PASCO COUNTY SHERIFF LIEUTENANT JAY GALASSI is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

55.

Defendant, PASCO COUNTY SHERIFF SERGEANT CLINT MILLER is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

56.

Defendant, PASCO COUNTY SHERIFF SERGEANT KEVIN MACUMBER is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

57.

Defendant, PASCO COUNTY SHERIFF CHIEF GEORGE MCDONALD is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

58.

Defendant, PASCO COUNTY SHERIFF LIEUTENANT GARY RAULERSON is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

59.

Defendant, PASCO COUNTY SHERIFF SERGEANT BENJAMIN BIRGE is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

60.

Defendant, PASCO COUNTY SHERIFF CAPTAIN JAMES MALLO is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

61.

Defendant, PASCO COUNTY SHERIFF CAPTAIN JACK ARMSTRONG is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

62.

Defendant, PASCO COUNTY SHERIFF SERGEANT MICHAEL SHOUP is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

63.

Defendant, PASCO COUNTY SHERIFF CAPTAIN WILLIAM DAVIS is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

64.

Defendant, PASCO COUNTY SHERIFF CAPTAIN MICHAEL FARRANTELLI is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

65.

Defendant, PASCO COUNTY SHERIFF MAJOR STACY JENKINS is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

66.

Defendant, PASCO COUNTY SHERIFF CAPTAIN RAY REVELLL is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

67.

Defendant, PASCO COUNTY SHERIFF LIEUTENANT JOHN COLLIER is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

68.

Defendant, PASCO COUNTY SHERIFF SERGEANT WILL FERGUSON is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

69.

Defendant, PASCO COUNTY SHERIFF LIEUTENANT CHRISTOPHER JOYAL is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

70.

Defendant, PASCO COUNTY SHERIFF MAJOR ED BLACKMAN is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

71.

Defendant, PASCO COUNTY SHERIFF LIEUTENANT RICHARD BAIN is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

72.

Defendant, PASCO COUNTY SHERIFF SERGEANT ROBERTY LOWRY is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

73.

Defendant, PASCO COUNTY SHERIFF ADMINISTRATIVE LIEUTENANT WARREN JONES is a citizen of Florida, resides in the Middle District of Florida and is being sued in his official and individual capacity.

74.

All of the above listed Plaintiffs and Defendants are subject to the personal jurisdiction of this Court.

75.

This Court has subject matter jurisdiction over this case pursuant to 18 U.S.C. § 1964(c), 28 U.S.C. § 1332 (federal question), and 28 U.S.C. § 1367 (ancillary jurisdiction).

76.

Venue is proper in this district, pursuant to 28 U.S.C. § 1391(b), as all Defendants reside in this district and events giving rise to Plaintiffs' claims occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 1965, as all Defendants work for the Pasco Sheriff's Office, where all the claims occurred, which is located and conducts its affairs in the Middle District of Florida.

IV. FACTS OF THE CASE

A. 1. Christopher Squitieri - First Internal Affairs Complaint IA-2018-037

77.

On or about May or June of 2018, Plaintiff, SQUITIERI was the Pasco Sheriff's Office Coordinator for New Member Orientations, where he was in charge of training scheduling for all newly hired Deputies. This coordinating and scheduling of the training disciplines took place at the Pasco Sheriff's Office Training Unit and the Pasco Hernando Police Academy.

78.

During this time, Plaintiff, SQUITIERI was approached by a female Deputy named Sheryl Johnson-Tandy (herein after “Johnson-Tandy”), who apprised Plaintiff, SQUITIERI that she was not being utilized at the Pasco Hernando Police Academy due to Supervisors and Defendants, SGT. JONES and ERICKSON, as well as the unit as a whole, discriminating against her and other female trainers because they were women.

79.

Johnson-Tandy specifically apprised Plaintiff, SQUITIERI that supervisors and Defendants, SGT. JONES and ERICKSON were intentionally not allowing her or the other women to instruct: (1) firearms training; (2) defensive tactics training; (3) teaser training; and, (4) blocks of mandatory in service training, and high liability training,¹ because they were women and instead, gave all of these training positions to male Deputies.

80.

Plaintiff, SQUITIERI went to Defendants, SGT. JONES and ERICKSON, and apprised them that Johnson-Tandy advised that she was not being utilized for instructing: (1) firearms training; (2) defensive tactics training; (3) teaser training; and, (4) blocks of mandatory in service training, and high liability training, because she was a woman. Plaintiff, SQUITIERI further apprised Defendants, SGT. JONES and ERICKSON, that Johnson-Tandy and other women stated that they have been subjected to this practice of gender discrimination with the Pasco

¹ In service training blocks change every month, depending on what level of training a cadet is entering. Meaning, there could be as many as fifteen different training programs in each in service training block.

Sheriff's Office's male supervisory staff at the Academy for several years and that Johnson-Tandy called it the "Boys Club".

81.

Defendants, SGT. JONES and ERICKSON attempted to discredit Johnson-Tandy by falsely alleging that: (1) she did not know how to speak with people; (2) they did not like the way she instructed cadets; and (3) she did not have confidence in her training abilities.

82.

Plaintiff, SQUITIERI apprised Defendants, SGT. JONES and ERICKSON that if they did not have documentation of these alleged deficiencies, or were not willing to document these allegations, he was going to utilize Johnson-Tandy and other women by scheduling them to instruct the disciplines for which they were certified in.

83.

Plaintiff, SQUITIERI, from this date forward, scheduled Johnson-Tandy and other women, for all disciplines training for which they were certified to instruct. This was at the behest of Defendants, SGT. JONES and Erickson.

84.

Defendants, SGT. JONES and ERICKSON, in retaliation, made sure every time that Plaintiff, SQUITIERI was not the lead supervisor for an event that Johnson-Tandy and other women were submitting for consideration, they would intentionally schedule a male Deputy to instruct the class and would allow the other male lead instructors to not use Johnson-Tandy or Christine Dzikonski (hereinafter "Dzikonki").

85.

On or about May of 2018, Plaintiff, SQUITIERI was promoted to replace Defendant, ERICKSON, as Supervisor of Training, which gave him the same authority as Defendant, SGT. JONES in supervising the Pasco Sheriff's Office Training Unit. Defendant, ERICKSON was reassigned to a patrol Sergeant.

86.

From the date Plaintiff, SQUITIERI was promoted to Supervisor of Training with Defendant, SGT. JONES, to lead the Pasco Sheriff's Office Training Unit, he witnessed firsthand Defendant, SGT. JONES' intentional implicit gender discrimination and intentional actions of not scheduling Johnson-Tandy, Dzikonski and other women for in service training blocks, and instead scheduling male Deputies to instruct the training classes.

87.

Plaintiff, SQUITIERI, from the date he was promoted to Supervisor of Training, ensured that he utilized all trainers, male and female, without prejudice or gender discrimination. He made his determination of scheduling based on the trainers availability and qualifications, not their gender, to break up the clear gender bias that he witnessed firsthand once he began working his supervisory position.

88.

On or about September of 2018, Dzikonski made a verbal complaint on gender discrimination as she was conducting her exit interview for her retirement.

89.

On or about September of 2018, Pasco Sheriff's Office initiated an internal affairs investigation on Defendant, SGT. JONES for hostile work environment, at which time they immediately transferred him to Road Patrol Sergeant.

90.

On or about October 11, 2018, Plaintiff, SQUITIERI testified at the Internal Affairs investigation on Defendant SGT. JONES, and truthfully testified to paragraphs twenty six (67) through thirty seven (77) above, blowing the whistle on women being discriminated against because of their gender at the Pasco Sheriff's Office Training Unit.

91.

Defendants are in violation of: (1) Title VII of the Civil Rights Act of 1964, which prohibits employers from discriminating against employees on the basis of race, color, religion, sex, or national origin; and (2) Florida Civil Rights Act of 1992.

92.

On or about October 19, 2018, Plaintiff, SQUITIERI was subjected to intentional retaliation through a knowingly false Internal Affairs discourtesy complaint, IA#2018-037, filed by Defendant, HITE, alleging that he made an inappropriate statement to her as his co-worker. Defendants intentionally conspired to retaliate against Plaintiff, SQUITIERI for his sworn testimony in the Internal Affairs investigation of SGT. JONES, in an attempt to discredit his truthful testimony given on October 11, 2018 and for blowing the whistle on the gender discrimination at the Pasco Sheriff's Office Training Unit. **See Exhibit A**

93.

Defendants, NOCCO and HARRINGTON knew this was a false Complaint by: (1) the inconsistencies in Defendants, HITE and BENNETT's statements pertaining to what happened and when the alleged incident happened; and (2) the nine (9) other witnesses who stated that Plaintiff, SQUITIERI never said the inappropriate statement, but stated to the investigators that Defendant, HITE was the one they heard swearing while in Defendant, BENNETT's office.

94.

Defendants, NOCCO and HARRINGTON encouraged and aided and abetted Defendant, HITE's false report and illegal actions against Plaintiff, SQUITIERI, for the expressed purpose to have a reason to suspended and fire him in retaliation for blowing the whistle on the gender discrimination with women, while under oath in his testimony to Internal Affairs.

95.

On or about October 20, 2018, at 11:45 hours, Defendant, HARRINGTON, on behalf of and at the request and/or encouragement of Defendant, NOCCO, contacted Plaintiff, PEARN, a witness on Plaintiff, SQUITIERI's Internal Affairs Investigation #IA-2018-037, attempting to coerce and pressure him into changing his statement in an open investigation that gave his truthful statement to the Internal Affairs investigator stating that he never heard Plaintiff, SQUITIERI say or direct an inappropriate statement to Defendant, Hite. **See Exhibit B.**

96.

Defendants, HARRINGTON and NOCCO did this illegal witness tampering in an attempt to further discredit Plaintiff, SQUITIERI, and illegally attempt to terminate his

employment with the Pasco Sheriff's Office for his sworn testimony on gender discrimination and widespread corruption.

97.

On or about October 21, 2018, Plaintiff, SQUITIERI testified at the Internal Affairs investigation for the first false Internal Affairs Complaint filed against him, #IA-2018-037, for alleged inappropriate statement of a coworker made towards Defendant, HITE.

98.

Plaintiff, SQUITIERI, truthfully testified under oath that he never made an inappropriate statement to any coworker, including Defendant, HITE.

99.

On October 23, 2018, Pasco Sheriff's Office placed Plaintiff, SQUITIERI on paid leave to investigate the Complaint made against him, which was an uncommon action, taken by the Pasco Sheriff's Office for an alleged inappropriate statement to a coworker.

100.

On or about November 6, 2018, Plaintiff, SQUITIERI was subjected to a lie detection test. This test was conducted at the request of the under signed Counsel, to: (1) confirm that he never made any type of inappropriate statement to Defendant, HITE on October 19, 2018, or any other day, in an attempt to have the Internal Affairs Complaint #IA-2018-037 dismissed as unfounded; and (2) to have Defendant, HITE investigated for violations of Florida Law and Pasco Sheriff's Office policy.

101.

Plaintiff, SQUITIERI was asked eleven (11) questions by the lie detection examiner: (1) is your name Chris? Yes; (2) is the color of my disk Brown? No; (3) Are you sitting down? Yes; (4) Have you ever been unprofessional in your dealings with Melissa Hite? No; (5) Is today Tuesday? Yes; (6) Have you ever used profanity in your dealings with Melissa Hite? No; (7) Am I wearing glasses? Yes; (8) Have you ever driven over the posted speed limit? No; (9) Is this the month of November 2018? Yes; (10) Did you use profanity of an extreme nature against Melissa Hite on October 19th 2018? No; (11) Are we in the state of FL? Yes.

102.

Plaintiff, SQUITIERI passed the lie detector test with NO DECEPTION INDICATED. See Exhibit D-lie detection test results. **See Exhibit C.**

103.

On or about November 6, 2019, Plaintiff, SQUITIERI submitted the results of the lie detection examination to the Pasco Sheriff's Office, who in turn said they would not consider the results because; (1) the lie detection test he passed was not the same type that the Pasco Sheriff's Office uses; and (2) the results are not admissible. **See Exhibit D**

104.

On or about March 1, 2019, Petitioner, SQUITIERI then requested Defendant, NOCCO to allow him to voluntary take a polygraph with whichever examiner he wanted, to prove that he was truthful and did not make an inappropriate statement to Defendant, HITE. Defendant, NOCCO denied Plaintiff, SQUITIERI's request to take a Polygraph test with whichever

examiner Defendant, NOCCO wanted. This put Defendant, NOCCO on notice that he was obstructing an investigation by covering up Defendant, HITE's violations under Florida Law and violations of Pasco Sheriff's Office policy, for filing a false report, falsifying official Pasco Sheriff's Office documents, perjury, etc. **See Exhibit E**

105.

On or about March 12, 2019, Defendant, NOCCO denied Plaintiff, SQUITIERI's second request for a lie detection test. **See Exhibit F**

106.

On or about March 13, 2019, Plaintiff, SQUITIERI's Internal Affairs Complaint, #IA-2018-037, was sustained. Plaintiff, SQUITIERI was given a two (2) day suspension for a false Complaint that he was not guilty of. This final disposition and Suspension was obtained in violation by Defendants' intentional conduct under RICO. **See Exhibit G**

A. 2. Christopher Squitieri - Second Internal Affairs Complaint IA-2018-045

107.

On or about January 24, 2019, Plaintiff, SQUITIERI was served with the second false Internal Affairs Complaint, #IA-2018-045, which Defendant, CHRISTENSEN knowingly and intentionally filed in retaliation, to have him fired. The second false Complaint alleges three (3) violations: (1) falsifying official documents; (2) untruthfulness; and (3) conduct unbecoming of an employee of the Pasco Sheriff's Office. **See Exhibit H**

108.

Defendant, CHRISTENSEN knowingly and intentionally drafted, signed and submitted this second sworn Internal Affairs Complaint under oath, knowing that the information that she was submitting was patently false. At the time of filing the second false Complaint, Defendant, CHRISTENSEN was in possession of the supplemental report which clearly states that “the presence of criminal intent of knowingly and willingly falsifying official documents could not be established”². Clearly showing there was no founded violation of Fla. Sta. 893.13. **See Exhibit I-Supplement report final case review showing no criminal conduct.**

109.

Defendant, CHRISTENSEN’s Complaint falsely alleged that Plaintiff, SQUITIERI committed three (3) violations: (1) falsifying official documents; (2) untruthfulness; and (3) conduct unbecoming of an employee of the Pasco Sheriff’s Office.³ Defendant, CHRISTENSEN knowingly and intentionally falsified official documents and perjured herself.

110.

Defendant, CHRISTENSEN did this because Defendants, NOCCO and HARRINGTON wanted Plaintiff, SQUITIERI terminated because he testified⁴ at the Internal Affairs investigation hearing on Defendant, SGT. JONES, stating that: (1) women were currently being discriminated against because of their gender; and (2) exposing widespread corruption with Pasco Sheriff’s Office, where Defendants, NOCCO, COLONEL HARRINGTON and other Official Administrative Staff knew of the gender discrimination, but did nothing to correct it. **See Exhibit J**

² See Exhibit C-PSO disposition of criminal investigation.

³ Counts 2 and 3 are derived off of count one: falsifying official documents.

⁴ See paragraphs 67-77 supra.

111.

In this false Internal Affairs Complaint, #IA-2018-045, Defendant, CHRISTENSEN knowingly and intentionally provided a false statement, under penalty of perjury, by stating that Plaintiff, SQUITIERI was in direct violation of Fla. Sta. § 893.13, for falsifying official documents. This false statement is the bases for these three (3) alleged violations listed in Complaint #IA-2018-045. **See also Exhibit D**, which clearly shows there was no basis to submit an Internal Affairs Complaint for falsifying official documents.

112.

Defendants, NOCCO and HARRINGTON refused to have this Internal Affairs Complaint dismissed for being false or to have the Pasco Sheriff's Office investigate this false Internal Affairs Complaint, #IA-2018-045, filed against Plaintiff, SQUITIERI, in any manner, for Office of Professional Standards Inspector and Plaintiff, CHRISTENSEN's criminal law violations of submitting a knowingly false Complaint. This is because Defendants, NOCCO and HARRINGTON knew that this Complaint was falsely filed against Plaintiff, SQUITIERI as they were personally directing the law violations against him so they could suspend and terminate his employment for blowing the whistle on the female gender discrimination within Pasco Sheriff's Office Training Unit.

113.

Defendants, FOSHEY and CORP. JONES conducted an academic and criminal investigation for which they cleared Plaintiff, SQUITIERI of any wrong doing at the Pasco Hernando State College.

114.

After Defendants, FOSHEY and CORP. JONES completed the academic and criminal investigations against Plaintiff, SQUITIERI, clearing him of any wrong doing, they turned the information over to the Major Crimes Unit to assist them in a contrary manner where they subsequently found Plaintiff, SQUITIERI guilty, without any evidence of the false allegations against him.

115.

Defendants, FOSHEY and CORP. JONES knowingly and intentionally conspired with the Defendants' RICO enterprise, to have Plaintiff, SQUITIERI fired, by intentionally concealing their findings in the academic and criminal investigations conducted at the Pasco Hernando State College.

116.

On or about May 1, 2019, Defendants, NOCCO and HARRINGTON fired Plaintiff, SQUITIERI for the violations falsely alleged against him in Internal Affairs Complaint, #IA-2018-045, even though it was clear he was not guilty of the conduct alleged within it.

117.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

118.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

119.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

120.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, SQUITIERI from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, SQUITIERI and other Pasco Sheriff's Office employees, to work for lower wages.

121.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, SQUITIERI and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

122.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, SQUITIERI and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, SQUITIERI to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

123.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, SQUITIERI and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

124.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, SQUITIERI "serious harm" [psychological, financial, and reputational harm] that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

125.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

126.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

127.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

128.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

129.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

130.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, SQUITIERI's injuries.

131.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, SQUITIERI from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other

agency from hiring him; causing Plaintiff, SQUITIERI to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

132.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, SQUITIERI's damages.

B. Anthony Pearn - Internal affairs Report IA-2018-044

133.

Plaintiff, PEARN, during all times relevant hereto, was employed with the Pasco Sheriff's Office as Manager of the Intelligence Led Policing Division. Plaintiff, PEARN received this supervisory position due to his outstanding career with the Federal Bureau of Investigation (FBI) where he directed over six hundred (600) agents.

134.

On or about October 8, 2018, Defendant, PEAKE, Major of Investigations/Criminal Intelligence Bureau, who oversees the Intelligence Led Policing Division, discovered that a

citizen of Pasco County had posted a booking arrest photo of Pasco Sheriff's Office K-9 Deputy, Carmack on Facebook.⁵

135.

On or about October 8, 2018, Defendant, PEAKE ordered Plaintiff, PEARN to arrest this woman resident of Pasco County by the end of the day because she had posted the prior arrest booking photo of Pasco Sheriff's Office K-9 Deputy, Carmack on Facebook.

136.

Plaintiff, PEARN apprised Defendant, PEAKE that he was not going to arrest the woman for simply posting an old booking arrest photo of Pasco Sheriff's Office K-9 Deputy, Carmack on Facebook because the photograph was public record and it was not against the law for her to share it on social media.

137.

Defendant, PEAKE then ordered Plaintiff, PEARN to lookup and find any information he could on the female resident and all of her family members living within Pasco County and then to target them through the Intelligence Led Policing (ILP) program. **See Exhibit K, ILP program Manual.**

138.

Plaintiff, PEARN went to Defendant, HARRINGTON and apprised him of Defendant, PEAKE's improper use of the Intelligence Led Policing Division as his personal army, to

⁵ The female citizen was exercising her first amendment right notifying the public that Sheriff Nocco was hiring individuals with arrest records. So, She posted a booking arrest photo of Pasco Sheriff's K-9 Deputy Carmack before he worked for the Pasco Sheriff's Office.

illegally harass and target Pasco citizens for speaking out and exercising their First Amendment Right to Freedom of Speech, because it was against the Defendant, NOCCO and the way he was running the Pasco Sheriff's Office.

139.

In response, Defendant, HARRINGTON apprised Plaintiff, PEARN that he would be better off if he transferred to a different division.

140.

Plaintiff, PEARN never heard anything else from Defendant, HARRINGTON on the Complaint he had verbally submitted, pertaining to Defendant, PEAKE's illegal use of the Intelligence Led Policing Division.

141.

Defendants, NOCCO, HARRINGTON, PEAKE, KRAUS, and GREGORY are knowingly and intentionally using the Intelligence Led Policing Division to violate Pasco County Citizens' rights-which is illegal. **See Exhibit K-ILP Manual.**

142.

On or about October 19, 2018, Plaintiff, PEARN was questioned by investigators in relation to Internal Affairs Complaint, #IA-2018-037, made against Plaintiff, SQUITIERI by Defendant, HITE wherein he stated that he did not hear Plaintiff, SQUITIERI direct any inappropriate statements to, or about, Defendant, HITE.

143.

On or about October 20, 2018, at 11:45 hours, Defendant, HARRINGTON, on behalf of, and at the request and/or encouragement of, Defendant, NOCCO, contacted Plaintiff, PEARN, a witness on Plaintiff, SQUITIERI's Internal Affairs Investigation #IA-2018-037, attempting to coerce and pressure him into changing his statement in the open investigation which he had already given his truthful statement to the Internal Affairs investigator, wherein he stated that he never heard Plaintiff, SQUITIERI say or direct any inappropriate statement to, or about, Defendant, HITE. See **Exhibit B**-Pearn's phone record.

144.

Defendants, HARRINGTON and NOCCO committed illegal witness tampering in an attempt to further discredit Plaintiff, SQUITIERI and illegally attempt to terminate his employment with the Pasco Sheriff's Office for the sworn testimony he gave on gender discrimination and widespread corruption.

145.

On or about October 23, 2018, Defendants, HARRINGTON and NOCCO together made the decision to remove Plaintiff, PEARN from the Equivalence of Training (hereinafter "EOT") courses, which Defendant, NOCCO personally approved him to take, in retaliation for his refusal to suborn perjury by not changing his statement that he didn't hear Plaintiff, SQUITIERI direct any inappropriate statement to, or about, Defendant, HITE.

146.

On or about October 26, 2018, Plaintiff, PEARN was apprised by Defendant, PEAKE that he was not under an Internal Affairs investigation and that he would not be targeted or

retaliated against for refusing to change his statement to Defendants, HARRINGTON and NOCCO's narrative.

147.

On or about October 26, 2018, Plaintiff, PEARN was called into Defendant, KRAUS' office and apprised he was being placed on paid administrative leave because he was a witness in Plaintiff, SQUITIERI's Internal Affairs Complaint, #IA-2018-037, and he was asked to hand over his ID badge, cell phone, and computer before being escorted from the building; This is not a common practice that the Pasco Sheriff's Office employs with its witnesses which are not the subject of an investigation.

148.

On or about October 29, 2018, Plaintiff, PEARN received a phone call from Defendant, KRAUS, advising that he was asked to call and apprise Pearn that he was being ordered by the Defendants, NOCCOS, HARRINGTON, CHRISTENSEN, and ROY, not to attend the public event of his wife's swearing in ceremony, thereby conspiring to violate, and violating, Plaintiff, PEARN's Civil Rights.

149.

On or about November 6, 2018, Plaintiff, PEARN was fired by Defendants, NOCCO and HARRINGTON, in retaliation for refusing to change his statement that he didn't hear Plaintiff, SQUITIERI direct any inappropriate statement to, or about, Defendant, HITE.

150.

On or about November 26, 2018, Defendant, CHRISTENSEN, in retaliation against Plaintiff, PEARN, initiated a false Internal Affairs Complaint on him; twenty (20) days after Defendants, NOCCO and HARRINGTON fired him without giving him a cause.

151.

Defendant, CHRISTENSEN falsified the Internal Affairs Complaint, an official document she made against Plaintiff, PEARN, by back dating it to October 26, 2018, to make it appear that the Complaint was active while he was still employed with the Pasco Sheriff's Office.

152.

On or about January 26, 2018, Defendant, PEAKE drafted a letter for Pasco Sheriff's Office's records Department stating that Plaintiff, PEARN was guilty of the violations in the Internal Affairs Complaint, #IA-2018-044, which was initiated after he was fired and no longer employed by the Pasco Sheriff's Office.

153.

This false Internal Affairs Complaint, #IA-2018-044, was knowingly and intentionally falsely filed against Plaintiff, PEARN by Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT after he was fired, in retaliation against him for refusing to change his statement in the Internal Affairs Investigation, #IA-2018-037, against Plaintiff, SQUITIERI, and to ensure that he would never be unable to obtain employment with any other law enforcement agency.

154.

This false Internal Affairs Complaint, #IA-2018-044, which was filed against Plaintiff, PEARN after his employment was terminated from the Pasco Sheriff's Office with no cause, has effectively prevented him from obtaining new employment with any law enforcement agencies beginning on October 26, 2018 to present, as was the intention of Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, causing Plaintiff, PEARN's proximate damages.

155.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

156.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

157.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

158.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, PEARN from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, PEARN and other Pasco Sheriff's Office employees, to work for lower wages.

159.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, PEARN and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

160.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, PEARN and the Pasco Sheriff's Office work force, to prevent them from leaving and

make them continue to work for less money, causing Plaintiff, PEARN to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

161.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, PEARN and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

162.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, PEARN "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

163.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4); and (b)(a).

164.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

165.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

166.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, , as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

167.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

168.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, PEARN's injuries.

169.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, PEARN from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, SQUITIERI to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

170.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, PEAKE, KRAUS, ROY, REED, HITE and BENNETT, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, PEARN's damages.

C. John Horning - Internal Affairs Complaint IA-2012-052

171.

Plaintiff, HORNING was employed with the Pasco Sheriff's Office beginning in approximately 1988 through 1990 and then again from approximately February of 2012 until he resigned on or about July 31, 2012.

172.

On or about June 16, 2012, Joseph Horning, Plaintiff, HORNING's brother, was a suspect involved in a criminal investigation for an alleged incident involving a vehicle dispute at Jerry's Auto Sales located at 6622 Land O'Lakes Blvd., Land O'Lakes, FL 34637.

173.

Suspect, Joseph Horning left Jerry's Auto Sales and immediately began attempting to make contact with his brother, Plaintiff, HORNING, who was on duty as a Patrol Deputy with the Pasco Sheriff's Office, to report the incident.

174.

On or about June 16, 2012, at 1716 hours, suspect, Joseph Horning made contact with his brother, Plaintiff, HORNING and reported the incident, prior to the report being entered by another Pasco Sheriff's Office Deputy who was contacted by Jerry's Auto Sales.

175.

Plaintiff, HORNING, pursuant to Florida Law and Pasco Sheriff's Office policy, filed a supplemental report due to suspect, Joseph Horning, and minor witness, Charis Horning, contacting him and speaking to him about the investigation.

176.

Plaintiff, HORNING, pursuant to Florida Law and Pasco Sheriff's Office policy, drafted and submitted the supplemental report detailing suspect, Joseph Horning, and minor witness, Charis Horning's statements to him. **See Exhibit L**

177.

Plaintiff, HORNING, based on the manner his brother was treated and the manner the Pasco Sheriff's Office was being ran by Defendant, NOCCO, applied at and completed the hiring process with Tampa Police Department prior to putting in his resignation at Pasco Sheriff's Office, which became effective on October 31, 2012.

178.

Plaintiff, HORNING worked at the Tampa Police Department for approximately one (1) year, from 2012 through 2013, before going to work in the private sector.

179.

On or about August of 2015, Plaintiff, HORNING applied for a position as a Bailiff with the Pinellas County Sheriff's Office and during the final phase of the application process of a three (3) person panel interview with the Pinellas County Sheriff's Office, he was questioned about an incident pertaining to tampering with a witness.

180.

Plaintiff, HORNING denied knowledge of any such incident and explained that he was not aware of, nor had he ever had any involvement with, any such incident of witness tampering, however, he was denied employment with the Pinellas County Sheriff's Office for the Bailiff

position due to the Pasco Sheriff's Office Internal Affairs investigation from 2012, for tampering with a witness and other violations.

181.

Plaintiff, HORNING contacted Defendant, HARRINGTON regarding this newly discovered, secret 2012 Internal Affairs Complaint which was falsely filed against him and for which he was never given notice of.

182.

Defendant, HARRINGTON conceded to Plaintiff, HORNING that the Internal Affairs Investigation was false and fraudulent because there should not have been a victim in the Internal Affairs Complaint and that he knew that Corporal Gilote falsified the Internal Affairs Investigation documents but there was nothing that he could do because he had intentionally interceded with Manny Garcia of the State Attorney's Office and Robert Green, resulting in the dismissal of the charges against Plaintiff, HORNING's brother, which was the bases for the Internal Affairs Complaint in the first place.

183.

Plaintiff, HORNING's wages were depressed from 2013 through 2019 as a result of this false Internal Affairs Complaint that Defendants, NOCCO and HARRINGTON, as well as other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally and falsely filed against him in retaliation for him secretly leaving to work for Tampa Police Department by completing the hiring process at Tampa Police Department prior to notifying the Pasco Sheriff's Office that he was leaving.

184.

Plaintiff, HORNING was a witness to the case involving his brother because his brother called him and told him what happened during the incident, which he wrote a report and tuned it in as verification. **See Exhibit L**

185.

Plaintiff, HORNING was retaliated against for being a witness to the incident with his brother, by being subjected to an Internal Affairs Complaint after he resigned from the Pasco Sheriff's Office, of which he was unaware of until he applied and interviewed for the Bailiff position at Pinellas County Sheriff's Office on or about August of 2015.

186.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

187.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

188.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

189.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, HORNING from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, HORNING and other Pasco Sheriff's Office employees, to work for lower wages.

190.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSEN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, HORNING and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

191.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, HORNING and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, HORNING to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

192.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, HORNING and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

193.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, HORNING "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

194.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4); and (b)(a).

195.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

196.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

197.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

198.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

199.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, HORNING's injuries.

200.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, HORNING from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, HORNING to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

201.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSON, MOORE, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, HORNING's damages.

D. James Steffens

202.

On or about January 1, 2016, Defendants, NOCCO, HARRINGTON and EAKLEY met and devised a scheme to extort one thousand (\$1,000) dollars from all Pasco Sheriff's Office and Defendant, NOCCO's commanding staff and another one thousand (\$1,000) dollars from their spouses, who had available funds to donate to Defendant, NOCCO's Campaign, for campaign contributions.

203.

On or about January 18, 2016, Plaintiff, STEFFENS was ordered by Defendants, NOCCO and HARRINGTON, through a phone conversation with Defendant, EAKLEY, to donate to Defendant, NOCCO's Campaign as part of his Commander Status duties in the amount of one thousand (\$1,000) dollars in his name and another one thousand (\$1,000) dollars under the name of his spouse at that time.⁶

204.

Defendant, EAKLEY made it clear to Plaintiff, STEFFENS in this phone conversation that Defendants, NOCCO and HARRINGTON wanted their position clear, that: (1) this was not a choice, but a demand and was mandated as part of his Commander responsibilities; and (2) that he was to come to work the next day with two thousand (\$2,000) dollars or he would be relieved of his Commander duties.

205.

⁶ Nocco knew at this time that he was running for Pasco County Sheriff unopposed-he did not need the money.

Plaintiff, STEFFENS, against his will and in fear of being fired, paid the two thousand (\$2,000) dollars (one thousand (\$1,000) dollars for himself and one thousand (\$1,000) dollars for his wife at that time) extortion donation for Defendant, NOCCO's Campaign for reelection, to keep his job. **See Exhibits M, campaign records showing two separate campaign extortion donations paid by Plaintiff, Steffens under his name at number 68 and his ex-wife at number 210.**

206.

In addition, Defendant, GREGORY was used to go out and collect donations throughout the tri-county area during business hours and under the umbrellas of his on-duty status during his 0900-1700 Monday through Friday work hours.

207.

Defendant, NOCCO received over one hundred thousand (\$100,000) dollars in donations for his re-election campaign.

208.

The one thousand (\$1,000) dollar extortion donations from each commanding officer and their spouses was discussed with Defendant, NOCCO and other commanding staff in the weekly commanding staff meetings held with Defendant, NOCCO every Thursday, wherein he apprised the entire commanding staff that he was running unopposed and they would not be getting their money back, it was being given to charities of Defendant, NOCCO's choice.

209.

Defendants, NOCCO, HARRINGTON, and EAKLEY sent checks by mail and made wire transfers to charities with these illegally extorted campaign donation proceeds.

210.

Not long after, Plaintiff, STEFFENS found out that Defendant, NOCCO allowed other commanding staff to not pay the mandatory one thousand (\$1,000) dollar campaign donations for commanding staff and spouses.

211.

On or about January 19, 2016, Defendants, NOCCO, HARRINGTON, and EAKLEY extorted one thousand (\$1,000) dollars from Plaintiff, STEFFENS, for Defendant, NOCCO's re-election campaign by forcing him, against his will, to donate the one thousand (\$1,000) dollars to Defendant, NOCCO's campaign which is a violation of Florida State and Federal law. **See**

Exhibit M

212.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

213.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

214.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

215.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, STEFFENS from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, STEFFENS and other Pasco Sheriff's Office employees, to work for lower wages.

216.

Defendants, NOCCO, HARRINGTON, and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, STEFFENS and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

217.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, STEFFENS and the Pasco Sheriff's Office work

force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, STEFFENS to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

218.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, STEFFENS and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

219.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, STEFFENS "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

220.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

221.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

222.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

223.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

224.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

225.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, STEFFENS's injuries.

226.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, STEFFENS' damages.

227.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of receiving the proceeds of extortion under 18 U.S.C. § 880.

228.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of fraud by wire, radio, or television under 18 U.S.C. § 1343.

229.

On or about January 20, 2016, Defendants, NOCCO, HARRINGTON, and EAKLEY again extorted one thousand (\$1,000) dollars from Plaintiff, STEFFENS for Defendant, NOCCO's re-election campaign by forcing him, against his will, to donate the one thousand (\$1,000) dollars under his then wife's name (Mary L. Steffens) to Defendant, NOCCO's

campaign, in violation of Fla. Stat. § 836.05, threats or extortion; Fla. Stat. § 104.091, aiding, abetting, advising, or conspiring. **See Exhibit M**

230.

Defendants, NOCCO, HARRINGTON and EAKLEY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of engaging in monetary transactions in property derived from specified unlawful activity under 18 U.S.C. § 1957.

E. CHRISTOPHER STARNES

231.

Plaintiff, STARNES was a highly decorated lieutenant who suffered a traumatic brain injury after being assaulted by subjects outside of a bar. Upon his return to work, Executive Staff and Defendants, NOCCO, HARRINGTON and GREGORY wanted him to retire but he received all the proper medical clearance and returned to his duties.

232.

Plaintiff, STARNES, after returning to work following his traumatic brain injury, was immediately placed in an unrealistic span of control supervising two and sometimes three districts.⁷ He requested assistance to properly supervise these two and three districts, but was not provided with any help.

233.

⁷ Each Pasco Sheriff's Office District has its own Lieutenant supervisor. Starnes was forced to supervise multiple districts at one time.

Plaintiff, STARNES was ordered by Defendants, FRICK and IRIZARRY to evaluate Brent Taber. Plaintiff, STARNES apprised Defendants, FRICK and IRIZARRY that he would not give Brent Taber a negative evaluation, just because they wanted to fire him, but that he would evaluate him fairly.

234.

This hostile work environment created by Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and IRIZARRY was the direct cause of another medical relapse of Plaintiff, STARNES, as documented by his physician.

235.

Approximately two days after refusing to falsify Brent Taber's evaluation report so that Defendants, FRICK and IRIZARRY could wrongfully terminate him, Plaintiff, STARNES was asked to report to Internal Affairs for an interview.

236.

Plaintiff, STARNES was apprised by Internal Affairs that two confidential informants (confidential informant #1 which was working off her criminal charges and confidential informant #2 which was being paid⁸) filed one complaint against him alleging that he had sexual intercourse with confidential informant #1.

237.

Plaintiff, STARNES was placed on paid administrative leave while Professional Standards Bureau Inspector/Defendant, CHRISTENSEN intentionally investigated this

⁸ These two informants are cousins.

knowingly false Internal Affairs Complaint from two alleged confidential informants for “conduct unbecoming of a deputy.” Defendant, CHRISTENSEN apprised Plaintiff, STARNES verbatim, “If I could make this False IA Complaint disappear I would,” which clearly shows she knew the Complaint was false.

238.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSEN knew the Internal Affairs Complaint filed against Plaintiff, STARNES was fabricated and wanted Defendant, CHRISTENSEN to personally handle the investigation to ensure that Plaintiff, STARNES would be forced out of the agency following a lunch meeting he had with Defendant, HARRINGTON, where he laid out everything that the narcotics division was doing wrong under its leadership which was dangerous and could get detectives and deputies injured or killed.

239.

Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSEN extorted Plaintiff, STARNES, by forcing him to sign a contract which stated the Pasco Sheriff’s Office would find the Internal Affairs Complaint falsely filed against him as unfounded if he resigned.

See Exhibit N

240.

Due to Plaintiff, STARNES’ extensive medical bills, fear of further fabricated retaliation and inability to care for his family if fired, he was forced to comply and resign through extortion, by signing the contract with the Pasco Sheriff’s Office which promised to clear the false Internal Affairs Complaint filed against him. **See Exhibit N**

241.

Defendants, Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSEN further extorted Plaintiff, STARNES by coercing him to sign the contract which also said he would not file a civil suit against the Pasco Sheriff's Office, or its employees, for violations of his rights and/or injuries. This event with the Pasco Sheriff's Office led to irreparable damage to Plaintiff, STARNES' physical health, mental health and career.

242.

Plaintiff, STARNES is the victim of a knowingly false Internal Affairs Complaint being filed against him by two (2) informants for which they swore to under penalty of perjury and Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSEN, never filed any charges against the two (2) informants for filing a false report or for perjury.

243.

Plaintiff, STARNES is a witness to the crimes of these two (2) informants for the filing of a false report against him and perjury and he was retaliated against by Defendants, NOCCO, HARRINGTON, GREGORY and CHRISTENSEN who forced him to sign a contract to resign through extortion or he would be fired and lose his pension, integrity, reputation, and ability to gain work with any other law enforcement agency.

244.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff caused Plaintiff, STARNES loss of property,

future retirement wages in the amount of monies undetermined by extorting him to sign a contract to resign, coercing him to retire two (2) years before his twenty five (25) years with Pasco Sheriff's Office which prevented him from being eligible to enter the retirement drop program to earn extra monies for the last five (5) years of his thirty (30) year career.

245.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

246.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

247.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

248.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, STARNES from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, STARNES and other Pasco Sheriff's Office employees, to work for lower wages.

249.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, STARNES and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

250.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, STARNES and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, STARNES to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

251.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, STARNES and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

252.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, STARNES "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

253.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4); and (b)(a).

254.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951 (a).

255.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

256.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

257.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

258.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, STARNES' injuries.

259.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive Staff, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, STARNES from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, STARNES to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

260.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, FRICK and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, STARNES' damages.

F. CHERYL HAZELTON

261.

Plaintiff, HAZELTON is a former Pasco Sheriff's Office K-9 Deputy and School Resource Officer who is presently residing outside of the State of Florida in an attempt to conceal her location, due to the fear of retaliation and targeting by the Pasco Sheriff's Office.

262.

Plaintiff, HAZELTON was forced to move out of the State to avoid Pasco Sheriff's Office corruption tactics which were carried out by all levels of supervision, including that of Defendants, NOCCO and HARRINGTON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff.

263.

Defendants, NOCCO and HARRINGTON, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff have issued subpoenas to Plaintiff, HAZELTON in an attempt to locate her. Plaintiff, HAZELTON has been advised by the State Attorney's Office to ignore these subpoenas as the Defendant, NOCCO is aware he should not be sending them.

264.

Plaintiff, HAZELTON has suffered many triggering events, including being subjected to daily gender and sexual discriminatory actions by her immediate supervisors.

265.

In open roll calls and in front of peers, Plaintiff, HAZELTON's immediate supervisor, Sergeant Rodgers, would use the derogatory Phrase "Hazel Toe" in reference to the slang term "Camel Toe" which is an offensive depiction of how clothing fits around the female's vagina, due to her assigned uniforms being issued in the wrong size. While Plaintiff, HAZELTON waited for properly fitted uniforms she was openly harassed on a daily basis.

266.

Plaintiff, HAZELTON was subjected to slander, intimidation, and discriminatory abuse via email as well as publicly targeted in front of her peers, both verbally and through electronic emails which were broadcasted throughout the agency.

267.

Plaintiff, HAZELTON filed a grievance against Defendant, FRICK for harassment and in retaliation for filing the grievance she was demoted from K-9 Corporal Deputy to a Patrol Deputy while the grievance was pending.

268.

Defendants, NOCCO, HARRINGTON, GREGORY and FRICK utilized Defendant, FONTAN to intimidate and harass Plaintiff, HAZELTON, creating a hostile and fearful work environment for her for the sole purpose of intimidating her into quitting or to find a reason to fire her.

269.

During Plaintiff, HAZELTON's demotion from Corporal to Deputy, a retirement email was sent out department wide which purposefully attached her demotion to it, for the sole purpose of intentionally slandering and discrediting her to her entire department.

270.

To further the retaliation against her, Plaintiff, HAZELTON was assigned to Patrol Deputy directly under Defendant, FRICK as her immediate supervisor, whom she had filed the grievance against, who effectively isolated her from her peers.

271.

On one occasion, Plaintiff, HAZELTON responded to a violent Baker Act call and upon arriving on the scene was attacked by the subject. During the struggle with the subject who violently tried to remove her gun from her holster to use against her in an attempt to get away, Plaintiff, HAZELTON sent out a distress call for assistance over the patrol radio channel. Two patrol backup units heard the struggle come over their patrol radio channel but chose to continue their lunch instead of responding to her distress call resulted in her being left in a life threatening situation for over thirty (30) minutes before receiving backup.

272.

Plaintiff, HAZELTON was working in a section of Hudson, Florida during this incident which is not considered a rural area of Pasco.

273.

Plaintiff, HAZELTON's patrol squad had available patrol units within close proximity to the incident which should have quickly responded to her distress call, however it took more than thirty (30) minutes for back up to arrive and assist her with this potentially life threatening situation.

274.

Plaintiff, HAZELTON expressed the improprieties she believed she was subjected to pertaining to the lack of response time from patrol deputies during this potentially life threatening situation where she was attacked by a violent Baker Act subject who attempted to

remove her gun and use it on her to get away, with her Sergeant/Defendant, FRICK who failed to address the lack of response to her distress call by her patrol squad peers.

275.

Defendant, FRICK, in retaliation for Plaintiff, HAZELTON filing the harassment grievance against him, only addressed her verbal communications dealing with the Baker Act subject who violently tried to remove her gun and use it against her to get away.

276.

Defendant, FRICK verbally reprimanded Plaintiff, HAZELTON, criticizing the manner in which she interacted with the Baker Act subject and insinuated that the subject assaulted her based on her actions causing the subject to turn on her, in an effort to cover up and conceal the other Patrol Deputies purposefully delayed response time.

277.

Plaintiff, HAZELTON's final triggering event was after she backed into a pole with her assigned cruiser and the Defendants attempted to have fellow Deputy Collier change his statement and to fabricate one that could potentially further damage her reputation.

278.

Plaintiff, HAZELTON was subjected to a hostile and unrealistic working environment where excessive duties were applied to her daily work load, but not to others with similar positions, and without notice. She was required to work long hours and/or shifts in an attempt to force her into resigning from the Pasco Sheriff's Office K-9 School Resource Officer position and eventually from the Sheriff's Office itself.

279.

Plaintiff, HAZELTON was asked to write a General Order pertaining to her K-9 School Resource Officer position, outlining what would assist her with her daily duties, as they were not presently outlined in the General Order or job description. After she had prepared requested document, they then used it against her in an attempt to portray her as a defiant and disruptive employee.

280.

Plaintiff, HAZELTON was subjected to Fair Labor Standard Act (FLSA) violations because she was not compensated for the extended hours she was forced to work minute, which were unrealistic, unsafe and hostile, as well as not being compensated for her travel time.

281.

Plaintiff, HAZELTON was subjected to Family Medical Leave Act (FMLA) violations for sick time of which she had undisputable medical records to support but that she was coerced out of using and pressured into reporting to her position in an unsafe condition in fear of retaliation for not showing up.

282.

Plaintiff, HAZELTON reported these incidents to her immediate supervisor on several occasions, after which she felt her life was at risk if she remained employed with the Pasco Sheriff's Office or the State of Florida so she left the agency and went into hiding where she presently remains.

283.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

284.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

285.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

286.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, HAZELTON from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them;

thereby forcing Plaintiff, HAZELTON and other Pasco Sheriff's Office employees, to work for lower wages.

287.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, HAZELTON and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

288.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, HAZELTON and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, HAZELTON to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

289.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, HAZELTON and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for

which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

290.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, HAZELTON "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

291.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

292.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951 (a).

293.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive

Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

294.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

295.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

296.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, HAZELTON's injuries.

297.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, HAZELTON from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional

work reference which would prevent any other agency from hiring him; causing Plaintiff, HAZELTON to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

298.

Defendants, NOCCO, HARRINGTON, GREGORY, FRICK and FONTAN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, HAZELTON's damages.

G. NIKOLAUS KRIZ

299.

On or about December of 2018, Pasco Sheriff's Office Child Protective Investigation opened a complaint, where Heather Dubois was the assigned investigator, against Plaintiff, KRIZ's spouse, alleging that she had left her children alone while she was drinking; All times alleged in the complaint, Plaintiff, KRIZ, who was employed with the Pasco Sheriff's Office at the time, was working.

300.

On or about January of 2019, Plaintiff, KRIZ was informed that two (2) Pasco Sheriff's Office employees, Gang Unit Detective, Monte Shuler, and Firearms and Range Master Training Analyst, Kayhler McPhail were having an affair with his spouse.

301.

In addition to Plaintiff, KRIZ's spouse admitting to the affairs she was having with Detective, Monte Shuler and Training Analyst, Kayhler McPhail, he also had phone records to prove the affairs, so he filed an Internal Affairs Complaint against both, Detective, Monte Shuler and Training Analyst, Kayhler McPhail.

302.

Shortly after filing the Internal Affairs Complaints Plaintiff, KRIZ, was approached by Captain Harnett who asked him if he was sure he wanted to open up these complaints. This was the first attempt to pressure him into not moving forward with the Complaints against Detective, Monte Shuler and Training Analyst, Kayhler McPhail.

303.

A previous incident was reported against Training Analyst Kahler McPhail involving a female Pasco Sheriff's Office Deputy named Shannon Henrici, where he had choked her with such force that she urinated on herself. As a result of this incident, Training Analyst Kahler McPhail entered into a rehabilitation center for his alcohol abuse, but the incident itself was never investigated.

304.

Shannon Henrici personally apprised Plaintiff, KRIZ of this incident and informed him that the reason she didn't pursue criminal charges against Training Analyst Kahler McPhail was for fear of retaliation by the Defendants, NOCCO, HARRINGTON and GREGORY, as well as

Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff.

On or about February 28, 2019 at 01205, Plaintiff, KRIZ was approached at his home by Defendants, CABBAGE, BROOKS and MCCARTHY who apprised him that he hadn't answered his phone, and they were worried about his wellbeing. Plaintiff, KRIZ was not intoxicated and was fully aware of his emotional condition and told the deputies he was fine and didn't need to answer anyone on his cell phone, including his wife. Kriz further stated that he was not suicidal or trying to hurt himself or anyone else.

305.

Defendants, CABBAGE, BROOKS and MCCARTHY informed Plaintiff, KRIZ that they wanted him to come with them to talk to someone. When he asked why and if this was an attempt to have him baker acted they told him they could make it hard (meaning handcuffs and by force) or easy (meaning voluntarily going).

306.

Due to Plaintiff, KRIZ's fear of retaliation and force for filing the Internal Affairs Complaints against Detective, Monte Shuler and Training Analyst, Kayhler McPhail, he felt he had no choice but to voluntarily go with the deputies.

307.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS and MCCARTHY had Plaintiff, KRIZ Baker Acted in retaliation for him filing Internal Affairs

Complaints against Monte Shuler and Training Analyst, Kayhler McPhail following their sexual relationships with his spouse.

308.

Plaintiff, KRIZ was released just sixteen (16) hours later and immediately returned to his patrol duties for the next work shift.

309.

After returning to work, and in an act of intimidation, Pasco Sheriff's Office Deputies conducted a traffic stop on Plaintiff, KRIZ, approached his driver's window, shined a light in his eyes so as to obscure his vision and then stated "Okay, see you later."

310.

On or about April 12, 2019, McGuire Law Offices received an anonymous call from a Pasco Citizen that said she was questioned by a Pasco Sheriff's Office Deputy pertaining to a trespass incident in which Plaintiff, KRIZ was the responding deputy and that when she called the supervisor to follow up on a possible complaint, she was told that Plaintiff, KRIZ was recently fired.

311.

The anonymous caller informed McGuire Law Offices that the supervisor also provided her with confidential medical information, by stating that Plaintiff, KRIZ had been Baker Acted by The Pasco Sheriff's Office prior to being fired. Information that is both damaging and irrelevant to Plaintiff, KRIZ's dismissal.

312.

On or about April 13, 2019, Plaintiff, KRIZ discovered his wife was out drinking in bars while his children were left at his mother-in-laws house, who has been known to have substance abuse problems. He felt it was in the best interest of his children to come home with him and upon arriving at the mother-in-laws home, she voluntarily transferred custody of the children to him.

313.

Plaintiff, KRIZ's spouse contacted the Pasco Sheriff's Office and filed a Complaint against him for picking up his kids, which he has equal custody to and for which he is legally authorized to do.

314.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS and MCCARTHY illegally pinged Plaintiff, KRIZ's cellular phone to find his location so they could intimidate and assault him.

315.

Plaintiff, KRIZ and his children went to a close friend's home for the evening. At approximately 0345, Defendant, BROOKS, and approximately ten (10) other deputies, approached the house for an alleged welfare check of the children.

316.

The close friend and home-owner allowed three (3) deputies in to her home, where Plaintiff, KRIZ led the deputies in to the room where the children were asleep, allowing them to observe the children and subsequently asking them to leave the premises.

317.

Plaintiff, KRIZ is separated from his wife due to above aforementioned Internal Affairs Complaints, was a little concerned as to why the deputies were coming to the house with such a show of force and after a brief conversation he noted that Defendant, BROOKS was becoming extremely aggressive so he reiterated that he wanted them to leave and that they had no right to stay in the house.

318.

At this time, unprovoked, Defendant, BROOKS grabbed Plaintiff, KRIZ and threw him to the ground and a Lieutenant on scene intervened and told Defendant, BROOKS that they did not have a right to use force and that the call is being handled wrong.

319.

Plaintiff, KRIZ felt fear for his life and the lives of his children and repeatedly asked the deputies to leave. At one point Plaintiff, KRIZ stated "I hope your cameras are running because this is wrong" and Defendant, BROOKS responded "we know what you're up to. You can tell your attorney John, he knows where to find me" and "You're lucky the Lieutenant is here or you would be going to jail."

320.

Plaintiff, KRIZ told Defendant, BROOKS, “you have no charges”, and he replied “I’ll make one up.”

321.

Plaintiff, KRIZ’s close friend/home-owner where the incident took place witnessed this incident and was extremely shocked and frightened by the misuse of authority and power being exhibited by the Pasco Sheriff’s Office Deputies.

322.

Plaintiff, KRIZ’s father was listening to the entire incident via an open phone line, and also heard the entire conversation with Defendant, BROOKS.

323.

When the deputies left they stayed parked in front of the house for a short period of time where Plaintiff, KRIZ observed approximately ten (10) additional deputies show up, in an attempt to intimidate him, his children, and his friend.

324.

Defendant, BROOKS is the same supervisor that had unlawfully Baker Acted Plaintiff, KRIZ on or about February 28, 2019.

325.

At the time of this incident, Plaintiff, KRIZ had not yet retained an attorney and is presently in fear for his life, the lives of his children and as such is looking to move out of Pasco County.

326.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

327.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

328.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

329.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, KRIZ from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if

they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, KRIZ and other Pasco Sheriff's Office employees, to work for lower wages.

330.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, KRIZ and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

331.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, KRIZ and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, KRIZ to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

332.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, KRIZ and the

Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

333.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, KRIZ "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

334.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

335.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951 (a).

336.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

337.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

338.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

339.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, KRIZ's injuries.

340.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented

Plaintiff, KRIZ from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, KRIZ to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

341.

Defendants, NOCCO, HARRINGTON, GREGORY, CABBAGE, BROOKS, and MCCARTHY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, KRIZ's damages.

H. AARON ZIEGLER

342.

Plaintiff, ZIEGLER worked on the First STAR Unit, right before the Intelligence Led Policing Unit was developed at the Pasco Sheriff's Office, to make Pasco County felon's lives unbearable and to force them to move out of Pasco County or put them back in prison for several more years.

343.

The Intelligence Led Policing Unit was first implemented to decrease the likely hood of offenders being released from jail from committing crimes after their release by increasing police presence around them, their families and their known acquaintances.

344.

One of the methods of the Intelligence Led Policing is to charge offenders with crimes individually with one (1) case number per crime instead of charging all the crimes under one case number. This would result in multiple different case numbers for one crime, creating higher bonds and keeping frequent offenders off the streets longer.

345.

In approximately 2013, Plaintiff, ZIEGLER was apprised by his supervisor Defendant, IRIZARRY that he did not make the K-9 Unit, despite passing the try out for the fourth (4th) time, because he could not swim. Defendant, IRIZARRY stated that if Plaintiff, ZIEGLER were to go into water on a track and drowned, the Pasco Sheriff's Office would be liable.

346.

Plaintiff, ZIEGLER questioned Defendant, IRIZARRY about getting the vest submerged in water, as they are not supposed to get wet. Defendant, IRIZARRY stated, "we spoke with the manufacturer, and the vests can go into fresh water, just not salt water."

347.

In approximately 2013, Plaintiff, ZIEGLER emailed the manufacturer that supplied the bullet proof vests himself and was told by the company that under no circumstances was he to get his vest wet with fresh water or salt water because the vest would not have the same integrity to stop a bullet, confirming that Defendant, IRIZARRY had lied to him, putting his life and the lives of all the other Pasco Sheriff's Office Deputies, at risk.

348.

Plaintiff, ZIEGLER informed his fellow Deputies that under no circumstance could they get their vests wet in any manner or the vest would have diminished integrity and may not be effective in stopping a bullet had it not gotten wet in training, otherwise advising them disregard their supervisors claim that the vests could be submerged in fresh water.

349.

Plaintiff, ZIEGLER worked as a Field Training Officer (FTO) for approximately six (6) months in approximately 2013 under Defendants, GREGORY, MACUMBER and MILLER before putting in a transfer so that he could care for his disabled wife with severe back injuries during the day.

350.

After transferring from Field Training Officer, Plaintiff, ZIEGLER received a call from Defendant, MACUMBER stating: (1) Defendant, GREGORY was pissed that he left Field Training Officer to work night shift; and (2) Defendant, GREGORY was going to promote him to Corporal until he found out he transferred and ultimately causing Plaintiff, ZIEGLER to be denied every opportunity at promotion after his transferred.

351.

Chris Crawford was promoted to Corporal in ZIEGLER's place. Chris Crawford who is friends with Plaintiff, ZIEGLER told him that when he was promoted to Corporal, Defendant, GREGORY handed him his stripes and said "these are Ziegler's, he didn't want them."

352.

In retaliation for making Defendant, GREGORY angry for leaving his position as Field Training Supervisor, Plaintiff, ZIEGLER who was trained and certified was denied every attempt to join the K-9 Unit.

353.

In approximately 2016, Plaintiff, ZIEGLER starting having difficulty sleeping and concentrating as well as marital problems so he consulted with a counselor where he was diagnosed with Post Traumatic Stress Disorder (PTSD) resulting from a shooting he was involved in while employed with the Titusville Police Department, prior to being employed by the Pasco Sheriff's Office.

354.

In retaliation for making Defendant, GREGORY angry for leaving his position as a Field Training Officer, Defendants, GREGORY, IRIZARRY, SANBORN, GALASSI, and MEDINA attempted to force Plaintiff, ZIEGLER into making a mistake so that they could write him up and ultimately terminate him.

355.

Defendants, GREGORY, IRIZARRY, SANBORN, GALASSI, and MEDINA had two (2) patrol deputies who worked in Plaintiff, ZIEGLER's squad area, team up against him, forcing him to cover all the calls in their area by himself.

356.

While being forced to cover their entire area on his own, Plaintiff, ZIEGLER took a call involving a possible domestic or battery but due to the stress of being overworked, combined

with his undiagnosed Post Traumatic Stress Disorder, he made the mistake of failing to file a written police report where the alleged victim declined pressing charges.

357.

The Deputy who complained about Plaintiff, ZIEGLER failing to make a written battery report called Plaintiff, ZEIGLER on his cell phone while he was on meal break so he went back out to the residence and took the written report.

Defendants, SANBORN, RAULERSON, and MEDINA suspended Plaintiff, ZIEGLER for leaving the call and failing to make write a report.

358.

Plaintiff, ZIEGLER's house had no signal reception for his patrol radio, which was known by all Pasco Sheriff's Officer Supervisors, so he had requested and was granted approval to go home during his meal breaks.

359.

One day when Plaintiff, ZIEGLER was coming off his meal break and upon entering his patrol car, he heard units in the area of Lock Street in response to a shooting. He immediately responded by calling Defendant, MEDINA to get orders on where he was needed. Defendant, MEDINA gave Plaintiff, ZIEGLER an assignment and he proceeded as ordered.

360.

Defendant, MEDINA was aware that Plaintiff, ZEIGLER was at home on his meal break

and had no signal reception for his patrol radio but he never called him on his cell to come in. Defendant, MEDINA never said anything at all to Plaintiff, ZIEGLER about failing to respond until another Deputy made a Complaint.

361.

Defendants, GREGORY, SANBORN and GALASSI wrote Plaintiff, ZIEGLER up for being on lunch break at home,⁹ even though he was approved to be at his house for lunch.

362.

A new deputy had also complained about not having signal in District Two, but Defendants, GREGORY, SANBORN and GALASSI still suspended Plaintiff, ZIEGLER for four (4) days, for failing to respond in a timely manner. Defendant, RAULERSON placed Plaintiff, ZIEGLER on PPR.

363.

On or about June 28, 2018, Plaintiff, ZIEGLER was involved in a Deputy related shooting while on duty with the Pasco Sheriff's Office.

364.

Defendants, NOCCO, HARRINGTON, GREGORY, SANBORN, GALASSI, MACUMBER and Lieutenant Strube scheduled Plaintiff, ZIEGLER for work prior to being cleared by the State Attorney's Office for the shooting he was involved in on or about June 28, 2018.

365.

⁹ Was authorized by Sheriff's Office to eat lunch at home.

Plaintiff, ZIEGLER requested help for his Post Traumatic Stress Disorder (PTSD) from Defendants, GREGORY, SANBORN, GALASSI and Lieutenant Strube while they were in a meeting but they denied him any assistance or treatment; instead they told him that he could resign or he would be fired.

366.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER extorted Plaintiff, ZIEGLER by forcing him to resign in order to keep this vacation time and sick leave otherwise he would be fired and the Pasco Sheriff's Office would keep his vacation and sick pay which totaled approximately twenty four thousand (\$24,000) dollars.

367.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

368.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

369.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

370.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, ZIEGLER from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, ZIEGLER and other Pasco Sheriff's Office employees, to work for lower wages.

371.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, ZIEGLER and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

372.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, ZIEGLER and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, ZIEGLER to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

373.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, ZIEGLER and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

374.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, ZIEGLER "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

375.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

376.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951 (a).

377.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

378.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

379.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore

and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

380.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, ZIEGLER's injuries.

381.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, ZIEGLER from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, ZIEGLER to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

382.

Defendants, NOCCO, HARRINGTON, GREGORY, IRIZARRY, SANBORN, GALASSI, and MACUMBER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and

State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, ZIEGLER's damages.

I. SHANE METZLER

383.

Plaintiff, METZLER left the Pasco Sheriff's Office on his own accord in February of 2016, after being told he was being closely watched.

384.

Plaintiff, METZLER had a sole proprietor IT consulting company which was contacted by Frank Monte to do work for his marketing company.

385.

Defendant, NOCCO requested from Frank Monte, the owner of the marketing company: (1) Twenty Four Thousand (\$24,000) dollars for three (3) K-9 dogs; and (2) Forty Thousand (\$40,000) dollars for a Chevy Tahoe for the K-9 handler. Frank Monte agreed to both requests and gave Defendant, NOCCO the money.

386.

Multiple government agencies had previously investigated this marketing company but the Federal Bureau of Investigation (FBI) forced the Pasco Sheriff's Office to return the Forty Thousand (\$40,000) dollars received from Frank Monte in the summer of 2016.

387.

In approximately October of 2016, Defendant, GREGORY informed Plaintiff, METZLER that the owner, of the marketing company, Frank Monte, was going to walk on a technicality and asked if the owner would give the money back to the Pasco Sheriff's Office.

388.

Defendant, GREGORY informed Plaintiff, METZLER that the investigation was over and then Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY ordered Plaintiff, METZLER to get the Forty Thousand (\$40,000) dollars back from the owner of the marketing company, Frank Monte or he would be relieved of his duties. Plaintiff, METZLER refused this order.

389.

Two weeks later, in retaliation for Plaintiff, METZLER's refusal to get the Forty Thousand (\$40,000) dollars back from the marketing company, an Internal Affairs Complaint was filed against him and he was suspended with pay. The allegations in the complaint included falsifying a timesheet from approximately November 2014, which was signed off by Defendant, SGT. CABBAGE as well as a secretary or Lieutenant because he did not turn in the appropriate paperwork to back up the timesheet.

390.

Plaintiff, METZLER was subjected to multiple retaliatory Internal Affairs Complaints for: (1) improper use of agency computer for running Vehicle Identification Number (VIN) check when he had received the request from the Ohio Attorney General's Office; (2) working for a marketing company without proper paperwork which he had received authorization for

from previous Sheriff, Bob White and for which he had signed a contract on behalf of his company with the marketing company due to federal HIPPA regulations.

Pasco Sheriff's Office's Major Crimes Unit said that only detectives or higher were able to run Vehicle Identification Number's (VIN's). Plaintiff, METZLER was a detective in the ACE (narcotics) Unit at the time the VIN was ran. He explained that he was a detective and all Deputies and Civilian Service Units can run Vehicle Identification Number's (VIN's). Plaintiff, METZLER was accused of hacking the Pasco Sheriff's Office's computer system to allow all Deputies and Civilian Service Units to run Vehicle Identification Number (VIN) checks.

391.

During the investigation, Plaintiff, METZLER was informed he could return to active duty as a Sergeant but a week or two later he was suspended with pay again for six (6) counts of violating Driver and Vehicle Data Base "DAVID" regulations and six (6) counts of misdemeanor improper use of "DAVID". Plaintiff, METZLER cited case law and Florida Department of Law Enforcement (FDLE) code to refute these allegations.

392.

Plaintiff, METZLER was apprised by other Pasco Sheriff's Office staff that his supervisors were ordered by Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, to write him up for any possible reason, to get him terminated.

393.

In about December, the middle of the investigation, Plaintiff, Metzler was informed by Defendants, GREGORY and EAKLEY that he had been demoted to Deputy. Plaintiff,

METZLER was accused of eighteen (18) violations (one (1) felony, six (6) misdemeanors and eleven (11) Pasco Sheriff's Office policy violations). He was also given a letter of reprimand for not having authorization to work for a marketing company. The Complaint of falsifying his timesheet was unsubstantiated and all other violations were unfounded.

394.

Deputy Peppenella apprised Plaintiff, METZLER that Defendants, NOCCO, HARRINGTON and GREGORY were attempting to remove him for using statutes and case law to refute the allegations of the Internal Affairs Complaint and because he had refusal to recuperate the Forty Thousand (\$40,000) dollars related to the marketing scandal.

395.

Plaintiff, METZLER resigned from the Pasco Sheriff's Office. He was later denied employment from several other agencies related to allegations from the Pasco Sheriff's Office that METZLER refused to meet for an interview with Defendant, NOCCO, and that he was called "toxic" by the Pasco Sheriff's Office Human Resources. Also, Pasco Sheriff's Office "lost" Plaintiff, Metzler's training certificate, forcing to go through training again as a result.

396.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

397.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

398.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

399.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, METZLER from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, METZLER and other Pasco Sheriff's Office employees, to work for lower wages.

400.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, METZLER and the Pasco Sheriff's

Office work force, to prevent them from leaving and making them continue to work for less money.

401.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, METZLER and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, METZLER to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

402.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, METZLER and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

403.

Defendants, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, METZLER "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to

compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

404.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

405.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951 (a).

406.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

407.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

408.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

409.

Defendants, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, METZLER's injuries.

410.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, METZLER from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, METZLER to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

411.

Defendants, NOCCO, HARRINGTON, GREGORY and PEAKE, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and

State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, METZLER's damages.

J. ROYCE RODGERS

412.

In approximately 2010 Plaintiff, RODGERS started working for the Pasco Sheriff's Office as a patrol deputy, patrolling District Three (3). In approximately 2012, Plaintiff, RODGERS was selected as a Field Training Officer.

413.

In approximately 2013 Plaintiff, RODGERS was appointed to Corporal.

414.

In approximately 2015 Plaintiff, RODGERS received the title of "Sweetheart of a COP" from the Tampa bay Times for the work he had done with Pasco County's homeless. He was featured in the newspaper for providing shoes to a homeless male and for providing pizza to groups of homeless in Holiday, FL.

415.

In approx April of 2015 Plaintiff, RODGERS was selected by Defendant, HARRINGTON to head the District Three (3) STAR Team where they targeted prolific offenders and convicted felons.

416.

Under STAR a new list was generated every week by civilian analysts that would list five (5) new prolific offenders, as well as their families and associates within Pasco County, FL.

417.

Defendant, JENKINS ordered Plaintiff, RODGERS to “make their lives miserable until they move or sue us,” referring to the weekly prolific offenders. He was ordered to visit these prolific offenders, their families and their associates at all hours, numerous times a day.

418.

Under STAR, Plaintiff, RODGERS was ordered by Defendants, NOCCO, HARRINGTON, GREGORY and JENKINS to approach, and have his Deputies approach, these prolific offenders anytime and anywhere, for the expressed purpose of harassing them, their families and their associates.

419.

Plaintiff, RODGERS and his Deputies, at the orders of Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS would approach the houses of these individuals daily and at hours, using Code Enforcement to ticket them and their families for anything they could find.

420.

In approximately February of 2016, Plaintiff, RODGERS was promoted to Sergeant for District One (1) Patrol. This was given to him because he continuously followed all of Defendants, NOCCO, HARRINGTON, GREGORY and JENKINS’ orders to harass the prolific offenders, their families, and their associates.

421.

Defendant, RODGERS refused Lieutenant Sarbe's order to set up a perimeter while driving Code Three (3) with lights and sirens, towards a Deputy who requested assistance, after a suspect fled from him. It is against Pasco Sheriff's Office General Order to use the computer while driving Code Three (3) and it is extremely dangerous.

422.

Plaintiff, RODGERS was ordered by Lieutenant Sarne to find a child abuse case as unfounded. Plaintiff, RODGERS apprised Lieutenant Sarne that he had not yet spoken to the child victim so he could not find it unfounded. Lieutenant Sarne told Plaintiff, RODGERS that he had read the statements made by the suspected parents and that based on the information the Complaint was unfounded. Plaintiff, RODGERS insisted that he speak to the victim before making a finding on the case but Lieutenant Sarne ordered him to find the Complaint unfound without conducting the victim interview. Plaintiff, RODGERS was written up for this report, even though the reporting deputy was still investigating the incident with the victim.

423.

Plaintiff, RODGERS was written up two (2) times prior to taking sick leave for surgery.

424.

On or about April 23, 2019, when Plaintiff, RODGERS returned from surgery he met with Defendants GREGORY and FRICK where he was told that both of his write ups were going to be sustained but that they were not going to discipline him for them. He was also told that they had just received a Complaint for an incident that happened the previous year alleging he had pepper sprayed a homeless person's camp. They informed Plaintiff, RODGERS that they had no evidence of the incident but that he had to resign immediately or they were going to fire him and he would not be eligible for his vacation or sick pay.

425.

Plaintiff, RODGERS asked for permission to use his agency computer to investigate these false allegations but Defendants, GREGORY and FRICK denied his request.

426.

Plaintiff, RODGERS requested that he be demoted so that he could continue to work at the Pasco Sheriff's Office, instead of being extorted to resign by the Defendants, GREGORY and FRICK.

427.

Defendants, GREGORY and FRICK conferred with Defendants, NOCCO and HARRINGTON regarding Plaintiff, RODGERS' request and were advised that they would not allow Plaintiff, RODGERS to stay on with the Pasco Sheriff's Office and that he only had two (2) options: (1) resign immediately; or (2) be fired and the Pasco Sheriff's Office would keep his vacation and sick leave pay totaling approximately twenty six thousand (\$26,000) dollars.

428.

Defendants, NOCCO, HARRINGTON, GREGORY and FRICK refused to provide any evidence pertaining to the alleged incident against Plaintiff, RODGERS, and for which he was being extorted to resign for.

429.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco

Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

430.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS , as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

431.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

432.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, RODGERS from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, RODGERS and other Pasco Sheriff's Office employees, to work for lower wages.

433.

Defendants, NOCCO, HARRINGTON, GREGORY and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, RODGERS and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

434.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, RODGERS and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, RODGERS to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

435.

Defendants, NOCCO, HARRINGTON, GREGORY and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, RODGERS and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

436.

Defendants, NOCCO, HARRINGTON, GREGORY and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, RODGERS "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

437.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

438.

Defendants, NOCCO, HARRINGTON, GREGORY and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

439.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS , as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

440.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

441.

Defendants, NOCCO, HARRINGTON, GREGORY and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

442.

Defendants, NOCCO, HARRINGTON, GREGORY and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, RODGERS' injuries.

443.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, RODGERS from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, RODGERS to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

444.

Defendants, NOCCO, HARRINGTON, GREGORY, and JENKINS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, RODGERS' damages.

K. CLIFF BALTZER

445.

Plaintiff, BALTZER was employed with the Pasco Sheriff's Office from approximately 2000 through approximately December 2018 as a Corporal in the K-9 Unit, until he was extorted into resigning.

446.

From approximately March of 2018 through June of 2018 Plaintiff, BALTZER was acting Sergeant but was working under civilian Sanfa Johnson. During this time Plaintiff, BALTZER had to sign Sanfa Johnson's paperwork because he was not a sworn Pasco Sheriff's Office employee.

447.

Defendant, BIRGE was later assigned to the K-9 Unit as Supervisor but he had no knowledge of the K-9 Unit or experience with K-9 dogs.

448.

Plaintiff, BALTZER was constantly having to correct Defendant, BIRGE when he did something wrong or gave an erroneous command, including one occasion where he was discussing the procedure pertaining to releasing K-9 dogs into a residence without supervision.

449.

Due to Defendant, BIRGE's lack of experience and knowledge within the K-9 Unit, subordinates would often turn to Plaintiff, BALTZER instead of Defendant, BIRGE to receive their instructions and commands.

450.

As a result of Defendant, BIRGE's lack of knowledge and his subordinates going to Plaintiff, BALTZER, instead of him, he retaliated against Plaintiff, BALTZER with a false Internal Affairs Complaint, as a way to force him to resign. This was done for the expressed purpose of forcing Plaintiff, BALTZER out of the K-9 Unit.

451.

The Internal Affairs Complaint filed against Plaintiff, BALTZER in retaliation for correcting Defendant, BIRGE in front of his Unit was for allegedly failing to attend any of the biweekly K-9 training courses with his K-9 dog. **See Exhibit O**

452.

Defendant, BIRGE was put in charge of investigating the false Internal Affairs Complaint which he himself had intentionally initiated against the Plaintiff, BALTZER in retaliation for him correcting him in front of his Unit.

453.

Plaintiff, BALTZER used his agency computer and clearance login to investigate and gather evidence to defend against his false Internal Affairs Complaint, where he obtained documentation showing that he had the second most K-9 training hours within the Pasco Sheriff's Office. **See Exhibit P**

Plaintiff, BALTZER met with Defendant, MCDONALD, and provided him all of the evidence showing that he had the second highest K-9 training hours within the Pasco Sheriff's Office to prove that Defendant, BIRGE filed a false report as well as suborned perjury in his Complaint.

454.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Captain Hill and other Executive and Non-Executive Pasco Sheriff's Office Staff made the decision to sustain the Internal Affairs Complaint, even though Plaintiff, BALTZER provided evidence to substantiate that the Internal Affairs Complaint which Defendant, BIRGE filed against him was false and that Defendant, BIRGE had suborned perjury when he intentionally filed the false Internal Affairs Complaint him.

455.

As punishment for the sustained false Internal Affairs Complaint Plaintiff, BALTZER was removed from the K-9 unit because his K-9 was alleged to be defective for failing to attend K-9 training courses, when Defendants, NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Captain Hill and other

Executive and Non-Executive Pasco Sheriff's Office staff knew that the dog was defective since September 11, 2018 for not having the correct genes. **See Exhibits Q and R**

456.

Defendant, BIRGE threatened Plaintiff, BALTZER that if he continued to challenge the Internal Affairs Complaint he filed against him and investigated, he would have his K-9 dog euthanized and would blame the K-9 dog's death on him on social media.

457.

In response to Defendant, BIRGE's threat of having his K-9 dog euthanized, Plaintiff, BALTZER went to Defendant, MCDONALD and requested to purchase the K-9 dog to prevent the Pasco Sheriff's Office from euthanizing him.

458.

Plaintiff, BALTZER attempted to appeal the sanction for the write up, but was denied because employees are not authorized to appeal a sanction for counseling.

459.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, BIRGE and MCDONALD, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore advised Plaintiff, BALTZER that

he could purchase his K-9 dog for eight thousand five hundred (\$8,500) dollars and prevent the dog from being euthanized¹⁰.

460.

On or about November 29, 2018, Plaintiff, BALTZER entered into two contracts¹¹ with the Pasco Sheriff's Office and was extorted into paying the Pasco Sheriff's Office eight thousand five hundred (\$8,500) dollars for his K-9 dog to prevent the dog from being euthanized.

461.

When Plaintiff, BALTZER asked why he was told to make his check out, in the amount of eight thousand five hundred (\$8,500) dollars, to the Pasco Sheriff's Office and not the K-9 Association Fund, the charity (501C) which sponsored and paid for the dog through Wesley Chapel Toyota. Pasco Sheriff's Office Lead Counsel, Lindsay Moore did not answer, however she made Plaintiff, BALTZER pick up his personal check issued to the Pasco Sheriff's Office and required that he pay with a cashers check instead.

462.

Defendants, NOCCO, HARRINGTON, GREGORY CHRISTENSEN, BIRGE and MCDONALD transferred Plaintiff, BALTZER to District Two, which was the furthest District from his home, to pressure him into resigning from the Pasco Sheriff's Office.

Defendants, NOCCO, HARRINGTON, CHRISTENSEN, BIRGE and MCDONALD, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore then refused to turn over the K-9

¹⁰ This K9 dog should not have ever been subjected to being euthanized. Because it should have been given up for adoption.

¹¹ The first contract was changed by Harrington to blame Baltzer for the K9 being defective. Baltzer was forced to sign the changed contract to prevent the K9 from being euthanized. See **Exhibit S**

dog to Plaintiff, BALTZER, after he had paid the Pasco Sheriff's Office eight thousand five hundred (\$8,500) dollars for the dog, advising him that they would release the K-9 dog to him if he agreed to resign; using the dog as leverage to make him quit the Pasco Sheriff's Office.

463.

On or about December 3, 2018, Plaintiff, BALTZER submitted to the pressure and extortion, after having paid the Pasco Sheriff's Office eight thousand five hundred (\$8,500) dollars for the K-9 dog in an effort to prevent it from being euthanized and Defendants, NOCCO, HARRINGTON, CHRISTENSEN, BIRGE and MCDONALD, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore's refusal to release the K-9 dog, and he put in his resignation.

464.

Upon resigning, Plaintiff, BALTZER requested an exit interview with Defendant, NOCCO so that he could discuss the extortion of money he was forced to pay for his K-9 dog to keep the dog from being euthanized, as well as the false Internal Affairs Complaint filed against him and the proof he had and which he had provided during his investigation refuting the Complaint, but his request was denied.

465.

On or about December 4, 2018, Plaintiff, BALTZER received a call from the Pasco Sheriff's Office advising him that he could pick up his K-9 dog.

466.

After his resignation Plaintiff, BALTZER met with Defendant, REED and provided her with evidence which proved Defendant, BIRGE not only filed a false Internal Affairs Complaint

against him but that by filing the false Complaint he also suborned perjury, but she did nothing with the evidence he provided her.

467.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

468.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

469.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

470.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, BALTZER from being able to seek

employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, BALTZER and other Pasco Sheriff's Office employees, to work for lower wages.

471.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, SQUITIERI and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

472.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, BALTZER and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, BALTZER to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

473.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay

Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, BALTZER and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

474.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, BALTZER "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

475.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

476.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

477.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

478.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

479.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

480.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, BALTZER's injuries.

481.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, BALTZER from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, BALTZER to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

482.

Defendants NOCCO, HARRINGTON, CHRISTENSEN, BIRGE, REED, MCDONALD, FERGUSON, TEDESCHI and JOYAL, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, BALTZER's damages.

L. SEAN GIBSON

483.

Plaintiff, GIBSON left the Pasco Sheriff's Office in approximately 2011 to work for the Tampa Police Department.

484.

In approximately 2012, Plaintiff, GIBSON returned to work for the Pasco Sheriff's Office but Defendant, MALLO was displeased with his return, simply because he didn't like working at Tampa Police Department.

485.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER were unhappy with Plaintiff, GIBSON because he consistently remained busy doing other tasks and thereby avoided having to do any Intelligence Led Policing work.

486.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER were displeased with Plaintiff, GIBSON because he never gave out code enforcement violations.

487.

In retaliation for Plaintiff, GIBSON leaving Pasco Sheriff's Office to work for Tampa Police Department, his eluding the Intelligence Led Police work and for his lack of issuing code enforcement violations, Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, filed several false complaints against him to ensure that: (1) he could not get employment at any other agency; (2) he had to remain at the Pasco Sheriff's Office; and (3) that he would have to start issuing code enforcement violations.

488.

In approximately November of 2014 Plaintiff, GIBSON had an Internal Affairs Complaint filed against him for defending the legalization of medical marijuana on Facebook and he received a letter of reprimand.

489.

On or about May 6, 2015 Plaintiff, GIBSON had an Internal Affairs Complaint filed against him for conduct unbecoming after he made the comment “Screw the State Attorney’s Office)” on Facebook while advocating for body-cams for which he was again reprimanded.

490.

In approximately August 2015 Plaintiff, GIBSON had an Internal Affairs Complaint filed against him for Compliance with a Direct Order of a Supervisor and for Falsification of Official Documents after Defendant, SHOUP accused him of having false information on a report that would be transferred to the Major Crimes Unit. Defendant, SHOUP further accused Plaintiff, GIBSON of refusing to amend the report even though the report shows it was approved by Defendant, SHOUP. This Complaint was un-sustained.

491.

Another Internal Affairs Complaint was filed against Plaintiff, GIBSON in August 2015 for Compliance with a Direct Order of a Supervisor and for Processing Property and Evidence where he turned in concealed weapon or firearm license (CCW) permit late to evidence. Defendant, SHOUP lied during the Internal Affairs Investigation by alleging he did not attempt to have GIBSON change a report after SHOUP signed off on the report certifying the report was accurate.. and the Complaint is sustained.

492.

Approximately September of 2015 an Internal Affairs Complaint was filed against Plaintiff, GIBSON for Extra duty & off duty employment: related to Centurion, he attended a

single meeting at Centurion without signing a contract or paperwork. This Complaint was sustained.

493.

In approximately November of 2015 the final Internal Affairs Complaint was filed against Plaintiff, GIBSON for Careless Disregard where the previous five Internal Affairs Complaints filed against him were combined in to one, accusing him of never following orders.

494.

Plaintiff, GIBSON was coerced into resigning by the Fraternal Order of Police representative after the final Internal Affairs Complaint of Careless Disregard, which combined all his prior closed Internal Affairs Complaints together, was used to re-sanction and discipline him for alleged conduct which he had already been sanctioned and disciplined for.

495.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER extorted Plaintiff, GIBSON into resigning by threatening that if he refused to resign immediately he would lose his vacation and sick leave pay.

496.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

497.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

498.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

499.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, GIBSON from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, GIBSON and other Pasco Sheriff's Office employees, to work for lower wages.

500.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, GIBSON and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

501.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, GIBSON and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, GIBSON to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

502.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, GIBSON and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

503.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, GIBSON "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

504.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

505.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

506.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

507.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

508.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

509.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, GIBSON's injuries.

510.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, GIBSON from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, GIBSON to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

511.

Defendants, NOCCO, HARRINGTON, MALLO, ARMSTRONG, SHOUP and MILLER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, GIBSON's damages.

M. BRYAN SIKES

512.

Plaintiff, SIKES was employed with the Pasco Sheriff's Office from approximately September of 2008 through November of 2016.

513.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS were angry with Plaintiff, SIKES because he refused to target and harass prolific offender and their families on a daily basis.

514.

In approximately June of 2016 Plaintiff, SIKES requested the week of Thanksgiving off for vacation and it was approved.

515.

On or about October or November of 2016 Plaintiff, SIKES was admitted to the hospital and underwent emergency surgery for a burst gall bladder. Plaintiff, SIKES was admitted into

the hospital for five (5) days and the entire time he was in the hospital Defendants, MEDINA and DAVIS contacted him several times a day, harassing him about filling out his FMLA paperwork and asking when he would be returning to work.

516.

Plaintiff, SIKES returned to work just nine (9) days after having emergency surgery and being admitted in the hospital for five (5) days and upon returning to work he received an email from Defendant, DAVIS stating he would not be getting his requested time off for the week of Thanksgiving due to his poor planning, meaning his emergency surgery just a few weeks prior to his scheduled time off.

517.

Plaintiff, SIKES called Defendant, DAVIS and asked why his vacation request had been denied and explained that his surgery was an emergency as his gall bladder had burst. Defendant, DAVIS informed him that he did not have any vacation time left so his time was denied. Plaintiff, SIKES also found that Defendant, DAVIS had used his vacation time instead of his sick time while he was out with his emergency gall bladder surgery.

518.

On or about November 15, 2016 Plaintiff, SIKES decided that he could no longer cope with the constant daily harassment he received while working at the Pasco Sheriff's Office and gave his two (2) week notice.

519.

Immediately upon the Sheriff's Office receiving SIKES two (2) week notice, Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS fired Plaintiff, SIKES, refusing to allow him to work his last two (2) weeks.

520.

An Internal Affairs Complaint was filed against Plaintiff, SIKES after he was fired, for asking Defendant, DAVIS why his vacation request was denied after having received the email from him stating he would not get vacation due to his "Poor planning," and following up with him on that email, instead of following the chain of command by contacting Defendant, MEDINA first.

521.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS were angry with and constantly criticized Plaintiff, SIKES because he refused to check on the two (2) prolific offenders in his area on a daily basis and so they retaliated against him while he was hospitalized after having emergency surgery, by cancelling his requested and approved vacation time, by using his vacation time for his time off following his emergency surgery instead of his sick time, by firing him when he put in his two (2) week notice and refusing him the opportunity to work his last two (2) weeks and by filing an Internal Affairs Complaint against him after he had put in his resignation and was fired, preventing him from being employed with other agencies.

522.

Plaintiff, SIKES applied to many agencies but each time he was denied the position and he was unaware why until approximately April of 2017, when he received a letter from the Pasco Sheriff's Office stating that an Internal Affairs Complaint had been filed against him on November 16, 2016, the day after he put in his two (2) week notice and was fired.

523.

Plaintiff, SIKES was able to find employment as a reserve deputy but after just a few short days he resigned. Plaintiff, SIKES suffers from anxiety and panic attacks following the constant harassment, badgering and torment he received for so long by Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, that he can no longer bring himself to work in law enforcement.

524.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

525.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

526.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

527.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, SIKES from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, SIKES and other Pasco Sheriff's Office employees, to work for lower wages.

528.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, SIKES and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

529.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, SIKES and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, SIKES to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

530.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, SIKES and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

531.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, SIKES "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

532.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

533.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

534.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

535.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

536.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and

Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

537.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, SIKES's injuries.

538.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, SIKES from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, SIKES to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

539.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, MEDINA and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act

violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, SIKES's damages.

N. EDWARD LAPE

540.

Plaintiff, LAPE was employed with the Pasco Sheriff's Office from approximately 1990 through 2018 where he was a Sergeant at the Pasco County Jail and was forced to retire after three (3) erroneous Internal Affairs Complaints were filed against.

541.

Plaintiff, LAPE was with the Pasco Sheriff's Office for approximately twenty eight (28) years, he was the highest paid Sergeant in the agency earning Ninety One Thousand (\$91,000) dollars per year and he was only two (2) years from retirement.¹²

542.

Plaintiff, LAPE was ordered by Defendant, FARRANTELLI to arrest someone who was drunk and he refused.

543.

The first Internal Affairs Complaint against Plaintiff, LAPE was for insubordination for failing to recommend a Deputy for a Spirit Award after making a simple arrest.

544.

The Second Internal Affairs Complaint against Plaintiff, LAPE was for insubordination stemming from the same incident as the first Complaint which alleged that he cursed at a

¹² This was the annual rate for three (3) new deputies. LAPE was the highest paid sergeant in the agency.

Lieutenant. The Lieutenant later told Plaintiff, LAPE that he was ordered by his Captain to make the Internal Affairs Complaint against him and that his Captain altered it, adding the slanderous paragraph.

545.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS, and FARRANTELLI were conspiring to relieve LAPE of his employment because he was earning \$91,000 annually, and wanted to use this pay to divide it up to hire three (3) new Deputies-for the same cost

546.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS, and FARRANTELLI filed three (3) erroneous Internal Affairs Complaints against Plaintiff, LAPE and wrote him up at least ten (10) other times, in their effort to relieve him of his employment.

547.

Plaintiff, LAPE was forced to resign after an incident where one of his Deputies in the jail was attacked and punished, so in return, the Deputy attacked and assaulted the inmate. Plaintiff, LAPE pulled the Deputy off the inmate and continued to restrain the inmate until assistance arrived. This incident happened on Plaintiff, LAPE's last shift of the week, where he had the next two (2) days off.

548.

While on his two (2) days off, two (2) Internal Affairs Detectives approached him at his residence. The Detectives asked Plaintiff, LAPE about the incident and then placed him on administrative leave.

549.

All three (3) Internal Affairs Complaints that were filed against Plaintiff, LAPE were unsustained. Defendant, JENKINS apprised Plaintiff, LAPE that if he returned to work they were going to continue to harass him and write him up until he was fired.

550.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI apprised Plaintiff, LAPE that if he did not resign he would be fired and would not be eligible to collect his vacation and sick pay or his retirement.

551.

Plaintiff, LAPE was forced to resign in approximately 2018 causing him miss the drop program and ending his law enforcement career at twenty eight (28) years instead of the typical thirty (30) years, costing him approximately One Hundred Thousand (\$100,000) dollars in retirement pay.

552.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

553.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other

Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

554.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

555.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, LAPE from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, LAPE and other Pasco Sheriff's Office employees, to work for lower wages.

556.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff,

LAPE and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

557.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, LAPE and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, LAPE to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

558.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, LAPE and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

559.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, LAPE "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the

surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

560.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

561.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

562.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

563.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other

Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

564.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

565.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, LAPE's injuries.

566.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, LAPE from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, LAPE to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

567.

Defendants, NOCCO, HARRINGTON, GREGORY, CHRISTENSEN, JENKINS and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, LAPE's damages.

O. BRANDON MARCHIONE

568.

Plaintiff, MARCHIONE was employed with Pasco Sheriff's Office from approximately November of 2010 through November of 2015 before being forced to resign.

569.

In approximately 2012, Plaintiff, MARCHIONE received dual certification as a corrections officer and was also cleared for road duty.

570.

When Plaintiff, MARCHIONE was denied road Deputy, he made it known that he had applied to Tampa Police Department where he was then offered the position of road Deputy.

571.

Plaintiff, MARCHIONE's wife was arrested in approximately 2011 and pursuant to Pasco Sheriff's Office's General Order he apprised all required commanding Staff.

572.

In retaliation for Plaintiff, MARCHIONE submitting an application to Tampa Police Department¹³ and because his wife had been arrested, Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSON and CORP. JONES constantly harassed him in an attempt to make him resign or to find a reason to fire him.

573.

In approximately 2012, Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSON and CORP. JONES had the orientation coordinator pull Plaintiff, MARCHIONE out of class the day before beginning Field Training Officer, and inform him that he had an Internal Affairs Investigation pending for conduct unbecoming and informal statements.

574.

NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES transferred Plaintiff, MARCHIONE back to the jail, denying him of being a road Duty until he was cleared of the Internal Affairs Investigation.

575.

After the Internal Affairs Investigation was cleared, Plaintiff, MARCHIONE was denied road Deputy by Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, and forced to remain in the jail.

576.

¹³ Nocco, Harrington, Peake, Christensen, Corporal Jones, and all the other Defendants were irate and irritated when it came to Pasco Sheriff's Deputies leaving to Tampa P.D., or any other law enforcement agencies. Because so many of their Deputies and Staff were leaving without notice making them look incompetent. These Deputies leaving Pasco to work at other agencies embarrassed them because they knew other law enforcement agencies knew Pasco had serious problem keeping its Deputies.

Plaintiff, MARCHIONE was charged with a second random and unfounded Internal Affairs Complaint for the same type of Complaint as the first one in 2013.

577.

Plaintiff, MARCHIONE was cleared of his Second Internal Affairs Investigation but soon after a Third Internal Affairs Complaint for conduct unbecoming was filed against him.

578.

During the investigations, Internal Affairs Investigators went to all of Plaintiff, MARCHIONE's neighbors asking if he had a relationship with his wife while her criminal case was pending.

579.

Plaintiff, MARCHIONE moved out of his neighborhood and into an apartment in an attempt to get away from Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSON and CORP. JONES' harassment and retaliation but it continues and he was eventually forced to move out of the County to get away from the abuse.

580.

All Plaintiff, MARCHIONE's performance evaluations were near perfect while working at the Pasco Sheriff's Office.

581.

During his Third Internal Affairs Complaint, Plaintiff, MARCHIONE was fired by Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES.

582.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES later amended Plaintiff, MARCHIONE's termination to resigned.

583.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, during the First Internal Affairs Complaint in approximately 2012, asked Plaintiff, MARCHIONE to provide them with a list of women he had been seen and had sexual relationships with, to prove he was no longer seeing his fiancé.

584.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES' retaliation through constant harassment and false Internal Affairs Complaints was for the expressed purpose of ruining Plaintiff, MARCHIONE's career, using the narrative that he was maintaining a relationship with the mother of his child who was arrested. However, the charges against Plaintiff, MARCHIONE's fiancé were dropped immediately after he was terminated/resigned.

585.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES apprised Plaintiff, MARCHIONE that if he did not resign he would be fired and would not be eligible for his vacation and sick pay.

586.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-

Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

587.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

588.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

589.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, MARCHIONE from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring

them; thereby forcing Plaintiff, MARCHIONE and other Pasco Sheriff's Office employees, to work for lower wages.

590.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used false internal affairs Complaints to prevent MARCHIONE and other Pasco Sheriff's Office employees from being able to leave to another law enforcement agency, because they would not hire them with the prior internal affairs complaint. Forcing, Plaintiff MARCHIONE and other Pasco Sheriff's Office employees, to work for lower wages.

591.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, MARCHIONE and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

592.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, MARCHIONE and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to

work for less money, causing Plaintiff, MARCHIONE to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

593.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, MARCHIONE and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

594.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, MARCHIONE "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

595.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

596.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

597.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

598.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

599.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

600.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-

Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, MARCHIONE's injuries.

601.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, MARCHIONE from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, MARCHIONE to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

602.

Defendants, NOCCO, HARRINGTON, PEAKE, CHRISTENSEN and CORP. JONES, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, MARCHIONE's damages.

P. DEAN MARIANI

603.

Plaintiff, MARIANI was employed with the Pasco Sheriff's Office from approximately July of 1997 through June of 2018 as a Lieutenant before resigning.

604.

In approximately 2014 Plaintiff, MARIANI received an inmate grievance vetted by Defendant, LIEUTENANT JONES which had been submitted by a mentally ill inmate named Den Mendez, who stated in the grievance that Deputy Walker had punched him.

605.

Plaintiff, MARIANI was written up by Defendants, NOCCO, HARRINGTON, JENKINS, REVELL and FARRANTELLI as well as Major Beckman for attaching a memorandum and forwarding it to his Captain for review, which was the common practice for the inmate grievance procedures within the Pasco County Detention Center. However, in retaliation they used this as a reason to write Plaintiff, MARIANI up.

606.

Pasco Sheriff's Office General Order policy 26.2, clearly states that only CID and Professional Standards Unit are to investigate complaints of law violations by Certified Members. Assaulting an inmate is a law violation and therefore should not be investigated by Plaintiff, MARIANI. **See Exhibit T General Order 26.2**

607.

Pasco Sheriff's Office inmate grievance procedure states the Support Services Sergeant, Bureau Captain, or designee will receive the grievance for alleged violations of inmate's rights or criminal acts. The Pasco County Detention Centers policy states the supervisor or shift/section commander will conduct the investigation. **See Exhibit U Grievance procedure.**

608.

Plaintiff, MARIANI was not acting in any of these capacities at the time he was written up for not investigating an inmate grievance that was already vetted by Defendant, LIEUTENANT JONES.

609.

Defendants, NOCCO, HARRINGTON, JENKINS, REVELL and FARRANTELLI as well as Defendant, MAJOR BECKMAN collectively made the decision to demote Plaintiff, MARIANI from Lieutenant to Deputy.

610.

Defendants, NOCCO, HARRINGTON, JENKINS, REVELL and FARRANTELLI as well as Defendant, MAJOR BECKMAN wrote up Plaintiff, MARIANI for two (2) Corrective Investigative Report's (CIR's) because as a Lieutenant he didn't issue a single Personnel Observation Report (POR) to any of his subordinates.

611.

In approximately 2018, Defendants, NOCCO, HARRINGTON, JENKINS, REVELL and FARRANTELLI as well as Defendant, MAJOR BECKMAN forced Plaintiff, MARIANI to resign by extorting him with the threat of his taking his vacation and sick pay and firing him if he refused to resign.

612.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other

Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

613.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

614.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

615.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, MARIANI from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any

other agencies from hiring them; thereby forcing Plaintiff, MARIANI and other Pasco Sheriff's Office employees, to work for lower wages.

616.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, MARIANI and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

617.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, MARIANI and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, MARIANI to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

618.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, MARIANI and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner

or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

619.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, MARIANI "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

620.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

621.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

622.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

623.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

624.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

625.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, MARIANI's injuries.

626.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented

Plaintiff, MARIANI from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, MARIANI to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

627.

Defendants, NOCCO, HARRINGTON, JENKINS, BECKMAN, REVELL and FARRANTELLI, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, MARIANI's damages.

Q. CHARLES KEPPEL

628.

Plaintiff, KEPPEL was an employee of Pasco Sheriff's Office from approximately October of 1997 through January of 2016 when he was fired.

629.

Plaintiff, KEPPEL had a positive career with the Pasco Sheriff's Office and relationship with Defendant, NOCCO, who referred to him as Chuckee.

630.

Plaintiff, KEPPEL instructed his deputies to ignore the directive of the Intelligence Led Policing to harass alleged prolific offenders

631.

Defendants, NOCCO, HARRINGTON, JENKINS, COLLIER and other commanding staff threatened Plaintiff, KEPPEL, saying things like “I don’t like you, and you do too much, I’m gonna have your stripes.”

632.

The first triggering event that caused Defendants, NOCCO, HARRINGTON, JENKINS, COLLIER and other commanding staff to retaliate against Plaintiff, KEPPEL was a post he made on Facebook, venting about his Commanding Staff Supervisors harassing him about doing “too much” because he was a Sergeant who performed traffic stops & would back up his Deputies.

633.

The second triggering event that caused Defendants, NOCCO, HARRINGTON, JENKINS, COLLIER and other commanding staff to retaliate against Plaintiff, KEPPEL was his handling of a hit and run case where one of his deputy went to arrest a mom for battery on a Law Enforcement Officer.

634.

Defendant, COLLIER instructed Plaintiff, KEPPEL’s deputy to not arrest her. The footage was on the body cam, with witnesses so he and the Deputy filed a report and went back to make the arrest.

635.

Defendants, NOCCO, HARRINGTON, JENKINS, COLLIER and other commanding staff subjected Plaintiff, KEPPEL to three (3) false and retaliatory Internal Affairs Complaints to have him fired.

636.

Defendants, NOCCO, HARRINGTON, JENKINS, COLLIER and other commanding staff subjected Plaintiff, KEPPEL to the First false Internal Affairs Complaint for allegedly mocking Defendants, COLLIER and JENKINS on Facebook, even though the posts did not mention any particular individuals.

637.

Defendants, NOCCO, HARRINGTON, JENKINS, COLLIER and other commanding staff subjected Plaintiff, KEPPEL to the Second false Internal Affairs Complaint for allegedly disobeying Defendants, JENKINS AND COLLIER by sending his squad their stats¹⁴ even though he was not the person that released the stats, someone else did.

638.

Defendants, NOCCO, HARRINGTON, JENKINS, COLLIER and other commanding staff subjected Plaintiff, KEPPEL to the Third false Internal Affairs Complaint for alleged careless disregard which resulted in him being fired

639.

¹⁴ KEPPEL had previously been given positive POR for doing this.

Plaintiff, KEPPEL applied to Hernando, Zephyrhills, New Port Richey, Pinellas, Tampa International Airport, Marion, Port Richey and Sumter and was denied employment due to Pasco Sheriff's Office's false Internal Affairs Complaints and the negative references provided from Pasco Sheriff's Offices Human Resources.

640.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

641.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

642.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

643.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco

Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, KEPPEL from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, KEPPEL and other Pasco Sheriff's Office employees, to work for lower wages.

644.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, KEPPEL and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

645.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, KEPPEL and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, KEPPEL to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

646.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, KEPPEL and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

647.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, KEPPEL "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

648.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

649.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

650.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

651.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

652.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

653.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, KEPPEL's injuries.

654.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, KEPPEL from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, KEPPEL to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

655.

Defendants, NOCCO, HARRINGTON, JENKINS and COLLIER, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, KEPPEL's damages.

R. NICHOLAS SCRIMA

656.

Plaintiff, SCRIMA was employed with the Pasco Sheriff's Office from approximately March 10, 2014 through March 5, 2015.

657.

Plaintiff, SCRIMA was working at the Pasco County Detention Center when Defendant, LOWRY verbally asked him to help in a different unit.

658.

Defendants, BAIN and LOWRY told Plaintiff, SCRIMA to abuse a juvenile inmate while he was naked in the shower for no reason. The juvenile was compliant when Plaintiff, SCRIMA ordered him to get dressed.

659.

Plaintiff, SCRIMA refused Defendants, LOWRY and BAIN's erroneous orders to abuse a juvenile inmate and they later approached him and told him the he ignored a direct order and made them look weak.

660.

Plaintiff, SCRIMA consistently asked to be transferred to different work assignments and was denied each time from being transferred to other posts and Defendants, BAIN and LOWRY consistently assigned Plaintiff, SCRIMA to posts that required the most tasks to be completed each day.

661.

Defendants, NOCCO, HARRINGTON, LOWRY, BAIN and other commanding staff terminated Plaintiff, SCRIMA within a week of the incident, without any specific reason.

662.

There were no formal or informal Complaints filed against Plaintiff, SCRIMA, providing no reason for his termination.

663.

Plaintiff, SCRIMA discovered that while he was dating Deputy Vanessa Mauk-Doanne and working for the Pasco Sheriff's Office, Defendant, LOWRY was also sleeping with his girlfriend, Deputy Vanessa Mauk-Doanne.

664.

Plaintiff, SCRIMA and Deputy Vanessa Mauk-Doanne continued dating for about a month after his termination from the Pasco Sheriff's Office.

665.

Defendants, NOCCO, HARRINGTON, LOWRY, BAIN and other commanding staff intentionally retaliated against Plaintiff, SCRIMA causing him to be fired and loss of his property.

666.

Defendants, NOCCO, HARRINGTON, LOWRY, BAIN and other commanding staff, withheld Plaintiff, SCRIMA's vacation and sick pay when they fired him, prevented him from collecting this pay that he had earned while working for Pasco Sheriff's Office.

667.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN used Plaintiff, SCRIMA's vacation and sick pay to fund other things at the Pasco Sheriff's Office.

668.

Plaintiff, SCRIMA applied to the Pinellas County Sheriff's Office, completing the polygraph examination and all other requirements required by the agency. When Plaintiff, SCRIMA was asked why he was fired from the Pasco Sheriff's Office he could not answer the question because he was never told and did not know. As a result, Pinellas County Sheriff's Office denied Plaintiff, SCRIMA employment.

669.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's

Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

670.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

671.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

672.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, SCRIMA from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, SCRIMA and other Pasco Sheriff's Office employees, to work for lower wages.

673.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, SCRIMA and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

674.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, SCRIMA and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, SCRIMA to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

675.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, SCRIMA and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

676.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's

Office Staff threatened Plaintiff, SCRIMA “serious harm” [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

677.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff’s Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff’s Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

678.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff’s Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff’s Office Staff are in violation of 18 U.S.C. § 1951(a).

679.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff’s Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff’s Office Staff members’ actions are in violation of threats or extortion under Fla. Stat. § 836.05.

680.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff’s Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff’s Office Staff members’ actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

681.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

682.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, SCRIMA's injuries.

683.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, SCRIMA from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, SCRIMA to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

684.

Defendants, NOCCO, HARRINGTON, LOWRY and BAIN, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut

predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, SCRIMA's damages.

S. BRIAN KOZERA
685.

Plaintiff, KOZERA was employed with the Pasco Sheriff's Office from approximately February of 2010 through January 2019.

686.

Defendant, GREGORY called Plaintiff, KOZERA to set the story straight about a Facebook comment his wife made wherein she said "Totally agree," pertaining to a post stating that there was more to the story surrounding Plaintiff, STEFFENS' erroneously being fired. Defendant, GREGORY wanted Plaintiff, KOZERA to set his wife straight with his version of the facts surrounding Plaintiff, STEFFENS' termination. **See Exhibit V**

687.

Due to the Pasco Sheriff's Office's prior conduct pertaining to employees and their families being outspoken on Facebook about the Sheriff's Office, Plaintiff, KOZERA asked Defendant, GREGORY, if his wife's comment was going to harm his career with the Pasco Sheriff's Office.

688.

Defendant, GREGORY stated, "I don't think so," giving the insinuation that it was out of his hands and a decision that would be made from higher up. The harassment and retaliation started from this incident forward, until Plaintiff, KOZERA was ultimately forced to resign.

689.

Defendant, GREGORY had his sons, who worked in the IT Department at the Pasco Sheriff's Office go through Plaintiff, KOZERA's agency patrol computer while he was on duty, preventing him from being able to use his computer while working.

690.

Defendant, GREGORY did this to Plaintiff, KOZERA on daily basis to harass him and he feared that the Pasco Sheriff's Office would upload something onto his computer to give them reason to fire him and other Deputies.

691.

Plaintiff, KOZERA applied for several other positions within the Pasco Sheriff's Office but Defendant, GREGORY would always remove his name from the list of candidates for Defendant, NOCCO to choose from, preventing him from ever being considered.

692.

During Plaintiff, KOZERA's exit interview when he asked Defendant, HARRINGTON if he ever saw his name on the list of candidates for Defendant, NOCCO to choose from when he considered filling the other positions Defendant, HARRINGTON confirmed that Defendant, GREGORY would always remove Plaintiff, KOZERA's name from the list of candidates.

693.

Plaintiff, KOZERA after being harassed and retaliated against by Defendant, GREGORY and forced to live in constant fear, drafted and filed his resignation letter explaining that he was resigning because of Defendant, GREGORY's harassment and retaliation.

694.

Sergeant Carmen apprised KOZERA that HARRINGTON wanted to meet with him for an exit interview to get KOZERA to change his resignation letter, removing the negative sections pertaining GREGORY.

695.

Sergeant Carmen told to Plaintiff, KOZERA that he overheard Defendant, GREGORY telling Defendant, IRIZARRY that if he did not change his resignation letter pertaining to Defendants, NOCCO, HARRINGTON and GREGORY they would fire him and he would not be eligible for his vacation and sick pay. This extortion is common practice employed at the Pasco Sheriff's Office so that they get what they want and ensure that the Pasco Sheriff's Office is not made to look bad.

696.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

697.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

698.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco

Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

699.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, KOZERA from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, KOZERA and other Pasco Sheriff's Office employees, to work for lower wages.

700.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, KOZERA and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

701.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, KOZERA and the Pasco Sheriff's

Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, KOZERA to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

702.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, KOZERA and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

703.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, KOZERA "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

704.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

705.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

706.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

707.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

708.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

709.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco

Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, KOZERA's injuries.

710.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, KOZERA from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, KOZERA to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

711.

Defendants, NOCCO, HARRINGTON, GREGORY and IRIZARRY, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff KOZERA's damages.

T. RICHARD BYNUM

712.

Plaintiff, BYNUM was employed with the Pasco Sheriff's Office from approximately February of 2009 through June or July of 2016 when he resigned.

713.

Plaintiff, BYNUM was a victim of a false criminal allegation made by his girlfriend at the time, who alleged he hit her.

714.

Plaintiff, BYNUM got into a verbal disagreement with his girlfriend at the time, as well as a Deputy at a bar. Plaintiff, BYNUM left alone and his girlfriend at the time, who was very drunk went home alone.

715.

Plaintiff, BYNUM's girlfriend at the time, alleged that he hit her and that she was raped by a black male on her way home.

716.

On or about April 18, 2016, Plaintiff, BYNUM was served with a notice that he was being immediately placed on administrative leave pending an investigation of these criminal allegations made against him. **See Exhibit W**

717.

On or about April 18, 2016, Plaintiff, BYNUM contacted Defendant, GREGORY to discuss his time sheet for the Honor Guard. Defendant, GREGORY said to him, "You know what you did last night. Deputies were in front of your house." He responded, "no Sir, I, don't know what this is about." Defendant, GREGORY then instructed Plaintiff, BYNUM to go home and told him that he would contact him later.

718.

Defendant, GREGORY had already found Plaintiff, BYNUM guilty of the allegations against him, without even waiting for the disposition of the investigation being conducted.

719.

On or about June 28, 2016, while Plaintiff, BYNUM was on administrative leave pending the investigation, Defendant, GREGORY demoted him without cause. **SEE Exhibit X**

720.

During the investigation, unknown Pasco Sheriff's Office Detectives attempted to have Plaintiff, BYNUM's girlfriend at the time, change her story while she was being questioned.

721.

All allegations alleged by Plaintiff, BYNUM's girlfriend at the time, were determined to be false at the conclusion of the Pasco Sheriff's Office's investigation.

722.

On or about August 1, 2016, Plaintiff, BYNUM was cleared and authorized to return to work. Upon returning to work he was apprised by Defendants, DAVIS and GREGORY that he had been removed from the honor guard. When Plaintiff, BYNUM asked why he had been removed, he was told because Defendant, GREGORY said so.

723.

Plaintiff, BYNUM, in response to being removed from the Honor Guard without cause, tried to call Defendant, NOCCO, who has an open door policy, to ask why he had been removed from Honor Guard for no reason but was unable to speak with him.

724.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's staff Placed Plaintiff, BYNUM on the night shift in Dade City, FL, even though he lives in New Port Richey, FL.

725.

Defendants, NOCCO, HARRINGTON, GREGORY, and DAVIS apprised Plaintiff, BYNUM that he was going to work the midnight shift in Dade City or he could resign.

726.

Defendants, NOCCO, HARRINGTON, GREGORY, and DAVIS left Plaintiff, BYNUM no choice but to resign, thereby pushing him out of the Pasco Sheriff's Office.

727.

Plaintiff, BYNUM has been denied employment with every law enforcement agency that he has applied for due to the Pasco Sheriff's Office's negative reference for his conduct.

728.

Plaintiff, BYNUM was never subjected to an Internal Affairs Complaint and has never even been written up for any reason.

729.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco

Sheriff's Office Staff are in violation of obstruction of State or local law enforcement under 18 U.S.C. § 1511.

730.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of tampering with a witness under 18 U.S.C. § 1512.

731.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of retaliating against a witness or victim under 18 U.S.C. § 1513.

732.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff used the threat of false Internal Affairs Complaints to keep Plaintiff, BYNUM from being able to seek employment with other law enforcement agencies by putting fear in him and the Pasco Sheriff's Office work force, that if they left to be employed by another agency, they would receive a false Internal Affairs Complaint against them, creating a negative professional work reference and preventing any other agencies from hiring them; thereby forcing Plaintiff, BYNUM and other Pasco Sheriff's Office employees, to work for lower wages.

733.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, BYNUM and the Pasco Sheriff's Office work force, to prevent them from leaving and making them continue to work for less money.

734.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff intentionally put this fear in Plaintiff, BYNUM and the Pasco Sheriff's Office work force, to prevent them from leaving and make them continue to work for less money, causing Plaintiff, BYNUM to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

735.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, BYNUM and the Pasco Sheriff's Office work force, with threatened abuse of law or legal process, in a manner or for any purpose for which the law was not designed, in order to exert pressure on them to take some kind of action or refrain from taking some action.

736.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff threatened Plaintiff, BYNUM "serious harm" [psychological, financial, and reputational harm], that is sufficiently serious, under all the surrounding circumstances, to compel him to perform, or to continue performing labor or services, in order to avoid incurring that harm.

737.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1589(a)(2)(3)(4), and (b)(a).

738.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of 18 U.S.C. § 1951(a).

739.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of threats or extortion under Fla. Stat. § 836.05.

740.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions are in violation of aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091.

741.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff are in violation of extortion by Interstate Communications under 18 U.S.C. § 875(b)(c) and (d).

742.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff in the furtherance of the RICO enterprise, conspired to cause Plaintiff, BYNUM's injuries.

743.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff members' actions have prevented Plaintiff, BYNUM from being able to obtain employment at any other law enforcement agency for the past several years due to the treat of them filing false Internal Affairs Complaints and causing a negative professional work reference which would prevent any other agency from hiring him; causing Plaintiff, BYNUM to suffer a loss of property-lost income and lost wages with other law enforcement agencies.

744.

Defendants, NOCCO, HARRINGTON, GREGORY and DAVIS, as well as Pasco Sheriff's Office Lead Counsel, Lindsay Moore and other Executive and Non-Executive Pasco Sheriff's Office Staff knowingly and intentionally violated the above listed laws, committing clear cut predicate offense violations for Federal and State RICO Act violations and Federal and State conspiracy to interfere with civil rights violations, proximately causing Plaintiff, BYNUM's damages.

CLASS ACTION ALLEGATIONS

745.

Plaintiffs, CHRISTOPHER J. SQUITIER, JOHN HORNING, ANTHONY PEARN, JAMES STEFFENS, CHRISTOPHER STARNES, CHERYL HAZELTON, NIKOLAUS KRIZ, AARON ZIEGLER, SHANE METZLER, ROYCE RODGERS, CLIFF BALTZER, SEAN GIBSON, BRYAN SIKES, EDWARD LAPE, BRANDON MARCHIONE, DEAN MARIANI RICHARD BYNUM, CHARLES KEPPEL, JR, NICHOLAS SCRIMA and BRIAN KOZERA bring this action on behalf of all current and/or former employees with the Pasco Sheriff's Office who are and/or were subject to the above criminal violations by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES which caused Plaintiffs, SQUITIERI, PEARN, HORNING, STARNES, HAZELTON, KRIZ,

ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA, KOZERA and other employees of the Pasco Sheriff's Office to be victims of: (1) forced labor; (2) complete loss of wages; (3) tampering with a witness (4) retaliating against a witness or victim; (5) violations of 18 U.S.C. § 1951(a); (6) threats and extortion; (7) extortion by interstate communications; and (8) RICO conspiracy to proximately cause injury.

746.

The Class is so numerous that joinder of all Class members is impracticable. Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA believe the Class contains hundreds of members, and the actual number of Class members can be ascertained through discovery.

747.

There are numerous questions of law and fact common to the Class. Those questions include, but are not limited to:

a. How many persons who are employed at the Pasco Sheriff's Office have been subject to the illegal conduct of Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL,

BECKMAN, BAIN, LOWRY and LIEUTENANT JONES of suppressing wages by threat of retaliation and extortion during the period of the Class?

b. How many persons who are employed at the Pasco Sheriff's Office have been subject to the illegal conduct of Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES of intentional retaliation for blowing the whistle on Defendants' illegal conduct of intentional female gender discrimination during the period of the Class?

c. How many persons who are employed at the Pasco Sheriff's Office have been subject to the illegal conduct of Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES of intentional: (1) obstruction of State or local law enforcement under 18 U.S.C. § 1511; (2) tampering with a witness under 18 U.S.C. § 1512; (3) retaliating against a witness or victim under 18 U.S.C. § 1513; (4) Forced Labor under 18 U.S.C. § 1589(a), (2), (3), (4), and (b)(a); (5) threats or extortion under Fla. Stat. §

836.05 (6) interference with commerce by threats or violence under 18 U.S.C. § 1951; (7) aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091; (8) extortion by interstate communications under 18 U.S.C. § 875(b)(c) and (d); (9) RICO activity under 18 U.S.C. § 1961-1968; (10) RICO activity under Fla. Stat. § 895 et seq., confirming Defendants' intentional criminal violations for State and Federal Law, during the time period of the Class?

d. Have Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES conspired to retaliate and violate Plaintiffs' civil rights during the period of the Class?

e. Have Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES knowingly, or with reckless regard, violated Plaintiffs' civil rights, in violation of State and Federal Law during the period of the Class?

f. Are Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES part of an “enterprise” under State and Federal RICO statutes? and,

g. Have Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES engaged in a pattern of racketeering activity under the State and Federal RICO statutes, or acquired and maintained an interest in, a pattern of racketeering activity under the Florida RICO Statute?

748.

The claims of the Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA are typical of the claims of the Class. Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE,

MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA are former employees of the Pasco Sheriff's Office who's wages have been depressed by Defendants, , NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' retaliation and knowingly and intentionally violated State and Federal Laws. Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, SCRIMA and KOZERA have interests that are antagonistic or adverse to the other Class members.

749.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA were injured by direct and proximate reasons of Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG,

SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' illegal conduct.

750.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA will fairly and adequately protect the interests of this Class.

751.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA are adequate representatives of the Class. Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA are each former employees of the Pasco Sheriff's Office whose wages have been depressed through violations of state and federal law by threats, extortion, retaliation, and civil rights violations by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' illegal conduct.

752.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA have retained experienced counsel to litigate this complex Class action suit. Accordingly, Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA will fairly and adequately protect and represent the interest of the Class.

753.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA seek certification of a class, alternatively, under Fed. R. Civ. P. 23(b)(2) or 23(b)(3), or a combination thereof.

754.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' harboring of illegal actions has the effect of depressing wages and benefits to the detriment of members of the Class. Accordingly,

declaratory and injunctive relief that prevents the Pasco Sheriff's Office and the Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES from continuing to subject current employees to the above outlined and illegal conduct is appropriate on a Class basis.

755.

The questions of law and fact common to all members of the Class predominate over any questions that may affect only individual members of the Class.

756.

A class action is a superior method of adjudicating the Class members' claims because individual actions would unnecessarily burden the Court and create the risk of inconsistent results.

757.

Given the significant expense required to prosecute the foregoing claims against Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI,

JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES, the cost of individual actions would exceed or consume the amount recovered in any individual action. The expense of pursuing individual actions will require individual members of the Class to forego their individual claims against Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES if they are not permitted to pursue those claims as a Class.

758.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA are not aware of any litigation concerning the controversy that has already been initiated by or against any member of the Class.

759.

Because Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG,

SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES, and the members of the Class, reside in this district, and all of the events giving rise to this action took place in this district, it is both desirable and efficient to concentrate the litigation of these claims in this particular forum.

760.

This action is manageable because the evidence proving that Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES are engaged in alleged illegal conduct is common to the Class. Furthermore, the identities of the Class are known to Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES and the Pasco Sheriff's Office.

V. DEFENDANTS, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN,

CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI,
MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE,
MALLO,ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL,
COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT
JONES HAVE ENGAGED IN A PATTERN OF RACKETEERING ACTIVITY

761.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO,ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES are engaged in an ongoing pattern of racketeering activity as defined by Federal Racketeer and Influenced and Corrupt Organizations Act 18 U.S.C. § 1961et seq.

762.

The Federal RICO pattern of racketeering activity engaged in by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO,ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES

consists of more than two acts of racketeering activity, the most recent of which occurred within ten years after the commission of a prior act of racketeering activity.

763.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES are engaging in an ongoing pattern of racketeering activity as defined by Fla. Stat. § 895(7) and (8).

764.

The Florida RICO pattern of racketeering activity engaged in by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES consists of more than two acts of racketeering activity; the most recent of which occurred within four years after the commission of a prior act of racketeering activity.

765.

For the purposes of Federal RICO, the racketeering activity includes an open and ongoing pattern of violations of: (1) obstruction of State or local law enforcement under 18 U.S.C. § 1511; (2) tampering with a witness under 18 U.S.C. § 1512; (3) retaliating against a witness or victim under 18 U.S.C. § 1513; (4) forced Labor under 18 U.S.C. § 1589(a), (2), (3), (4), and (b)(a); (5) threats or extortion under Fla. Stat. § 836.05 (6) interference with commerce by threats or violence under 18 U.S.C. § 1951; (7) aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091; (8) extortion by interstate communications under 18 U.S.C. § 875(b)(c) and (d); (9) RICO activity under 18 U.S.C. § 1961-1968; (10) RICO activity under Fla. Stat. § 895 et seq.

Specifically, Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES have violated and continue to violate: (1) obstruction of State or local law enforcement under 18 U.S.C. § 1511; (2) tampering with a witness under 18 U.S.C. § 1512; (3) retaliating against a witness or victim under 18 U.S.C. § 1513; (4) forced Labor under 18 U.S.C. § 1589(a), (2), (3), (4), and (b)(a); (5) threats or extortion under Fla. Stat. § 836.05 (6) interference with commerce by threats or violence under 18 U.S.C. § 1951; (7) aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091; (8) extortion by interstate communications under 18 U.S.C. § 875(b)(c) and (d); (9) RICO activity under 18 U.S.C. § 1961-1968; (10) RICO activity under Fla. Stat. § 895 et seq.

766.

Each violation of: (1) obstruction of State or local law enforcement under 18 U.S.C. § 1511; (2) tampering with a witness under 18 U.S.C. § 1512; (3) retaliating against a witness or victim under 18 U.S.C. § 1513; (4) forced Labor under 18 U.S.C. § 1589(a), (2), (3), (4), and (b)(a); (5) threats or extortion under Fla. Stat. § 836.05 (6) Interference with commerce by threats or violence under 18 U.S.C. § 1951; (7) aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091; (8) extortion by interstate communications under 18 U.S.C. § 875(b)(c) and (d); (9) RICO activity under 18 U.S.C. § 1961-1968; (10) RICO activity under Fla. Stat. § 895 et seq., constitutes as an act of “racketeering activity” under the Federal Racketeer and Influenced and Corrupt Organizations Act 18 U.S.C. § 1961 et seq.

767.

Each violation of: (1) obstruction of State or local law enforcement under 18 U.S.C. § 1511; (2) tampering with a witness under 18 U.S.C. § 1512; (3) retaliating against a witness or victim under 18 U.S.C. § 1513; (4) forced Labor under 18 U.S.C. § 1589(a), (2), (3), (4), and (b)(a); (5) threats or extortion under Fla. Stat. § 836.05 (6) interference with commerce by threats or violence under 18 U.S.C. § 1951; (7) aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091; (8) extortion by interstate communications under 18 U.S.C. § 875(b)(c) and (d); (9) RICO activity under 18 U.S.C. § 1961-1968; (10) RICO activity under Fla. Stat. § 895 et seq., constitutes an act of “racketeering activity” under the Florida RICO Act, Fla. Stat. § 895 et seq.

VI. The Acts of Racketeering Activity by Defendants are Related**768.**

The acts of racketeering activity committed by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES have the same or similar methods of commission in that they involve the knowing and intentional criminal and civil rights violations of forced labor to depress wages of Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA to: (1) prevent them from leaving the Pasco Sheriff's Office to seek employment elsewhere; and (2) retaliate against employees who blow the whistle on the criminal and civil rights violations and corruption, through the acceptance and use of extortion, knowingly using fraudulent Internal Affairs Complaints in connection with known perjured testimony and witness tampering.

769.

The acts of racketeering activity committed by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL,

COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES have the same or similar objective: the reduction of wages paid to Pasco Sheriff's Office employees; the termination of employment and wages of Pasco Sheriff's Office employee whistle blowers and employee witnesses; and the permanent loss of future wages through Pasco Sheriff's Office's false Internal Affairs Complaints generated after the employees have been fired or resigned, to prevent them from obtaining future employment with any law enforcement agencies.

770.

The acts of racketeering activity committed by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES have the same or similar victims, including the Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA as well as the other members of the Class.

771.

The acts of racketeering activity committed by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY,

FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES are otherwise related by distinguishing characteristics including, but, not limited to, the involvement of Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES, and other members of the association-in-fact enterprise identified above.

VII. The Acts of Racketeering Activity Committed by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES, Involve a Distinct Threat of Long-Term Racketeering Activity

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' acts of racketeering activities involve a distinct threat of long-term racketeering activity.

773.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' practice of knowingly and intentionally violating the following statutes for years: (1) obstruction of state or local law enforcement under 18 U.S.C. § 1511; (2) tampering with a witness under 18 U.S.C. § 1512; (3) retaliating against a witness or victim under 18 U.S.C. § 1513; (4) forced Labor under 18 U.S.C. § 1589(a), (2), (3), (4), and (b)(a); (5) threats or extortion under Fla. Stat. § 836.05 (6) interference with commerce by threats or violence under 18 U.S.C. § 1951; (7) aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091; (8) extortion by interstate communications under 18 U.S.C. § 875(b)(c) and (d); (9) RICO activity under 18 U.S.C. § 1961-1968; (10) RICO activity under Fla. Stat. § 895 et

seq., constitutes an act of “racketeering activity” under the Florida RICO Act, Fla. Stat. § 895 et seq., which is ongoing at the present time, and will continue into the future, unless halted by judicial intervention.

774.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES’ knowing and intentional criminal violations are part of its regular way of conducting the Pasco Sheriff’s Office’s official business.

775.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES have committed hundreds of violations of: (1) obstruction of state or local law enforcement under 18 U.S.C. § 1511; (2) tampering with a witness under 18 U.S.C. § 1512; (3) retaliating against a witness or victim under 18 U.S.C. § 1513; (4) forced Labor under 18 U.S.C. § 1589(a), (2), (3), (4), and (b)(a); (5) threats or extortion

under Fla. Stat. § 836.05 (6) interference with commerce by threats or violence under 18 U.S.C. § 1951; (7) aiding, abetting, advising, or conspiring under Fla. Stat. § 104.091; (8) extortion by interstate communications under 18 U.S.C. § 875(b)(c) and (d); (9) RICO activity under 18 U.S.C. § 1961-1968; (10) RICO activity under Fla. Stat. § 895 et seq., constitutes an act of “racketeering activity” under the Florida RICO Act, Fla. Stat. § 895 et seq. which constitutes an act of “racketeering activity” under the Federal RICO ACT 18 U.S.C. § 1961-1968 and Florida RICO Act, Fla. Stat. § 895 et seq., as part of its pattern of racketeering activity.

VIII. THE ENTERPRISE

776.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES used the Pasco Sheriff’s Office as an enterprise and/or vehicle for the commission of two or more predicate acts to conduct its racketeering activity. See. ¶¶ 1-180.

777.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER,

MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES are also considered an enterprise under the meaning for RICO; using this enterprise as vehicle for the commission of two or more predicate acts to conduct its racketeering activity. See ¶¶ 1-181.

778.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES conspired with the Pasco Sheriff's Office to share the common purpose of methods of commission, in that they involve the knowing and intentional criminal and civil rights violations to depress wages of Plaintiffs, to: (1) prevent them from leaving the Pasco Sheriff's Office to seek employment elsewhere; and (2) retaliate against employees who blow the whistle on the criminal and civil rights violations, and corruption, through the acceptance and use of knowingly fraudulent Internal Affairs Complaints in connection with known perjured testimony, witness tampering, obstruction of justice, and extortion. The enterprise has worked in this fashion continuously since 2011; the last 8 years.

779.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED,

ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES share the common purpose of methods of commission, in that they involve the knowing and intentional criminal and civil rights violations to depress wages of Plaintiffs, to: (1) prevent them from leaving the Pasco Sheriff's Office to seek employment elsewhere; and (2) retaliate against employees, victims, and witnesses who blow the whistle on the criminal and civil rights violations, and corruption, through the acceptance and use of knowingly fraudulent Internal Affairs Complaints in connection with known perjured testimony and witness tampering; (3) extortion; Obstruction of Justice The enterprise has worked in this fashion continuously since 2011; the last 8 years.

780.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES participate in the operation and management of the affairs of these enterprises, which exist for Defendants' (NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN,

CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES) benefit.

781.

This association of Defendants (NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES) and the Pasco Sheriff's Office, constitutes an association-in-fact enterprise pursuant to Federal Racketeer and Influenced and Corrupt Organizations Act 18 U.S.C. §1961 et seq.

782.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES themselves, constitutes an association-in-fact

enterprise pursuant to Federal Racketeer and Influenced and Corrupt Organizations Act 18 U.S.C. §1961 et seq.

783.

These enterprises affect interstate commerce in a variety of ways.

784.

These enterprises affect interstate commerce in that they reduce and or terminate the income of employees who are still part of the Pasco Sheriff's Office work force.

785.

The enterprise also affects interstate commerce in that the Pasco Sheriff's Office, a member of the enterprise, is directly engaged in the production, distribution and acquisition of goods and services in interstate commerce.

786.

The Pasco Sheriff's Office accepted and retained the benefits of the acts of racketeering activity, thereby ratifying the conduct of its managers, employees, and the members of the enterprise who assisted it in committing those acts of racketeering activity.

787.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES accepted and retained the benefits of the acts of

rackeering activity, thereby ratifying the conduct of its managers, employees, and the members of the enterprise who assisted it in committing those acts of rackeering activity.

IX. DEFENDANTS, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES HAVE CAUSED PLAINTIFFS' WAGES TO BE DEPRESSED

788.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' violations of Federal and Florida RICO proximately have caused the wages of Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA and all other members of the Class to be depressed below what they would have been in a labor market comprised of a lawful Sheriff's Office without their criminal law violations.

789.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA, KOZERA, and the Class have suffered an injury to their “business or property.” i.e. lost wages, as a direct result of Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES’ violations of Federal RCIO, and injury as a result of Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES’ violations of Florida RICO.

790.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY,

BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' unlawful conduct has allowed Pasco Sheriff's Office to earn or retain significant funds which it is not entitled to. For example, Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' illegal criminal actions have forced its employees to stay working for the Pasco Sheriff's Office for less pay, to prevent the retaliation of false Internal Affairs Complaints, which would prevent them from working with any other law enforcement agencies in the future. These savings contribute to the Pasco Sheriff's Office's budget margins and allow Defendant, NOCCO to use these illegally obtained funds for the expressed purpose to fund other programs and create other positions that Defendant, NOCCO was not able to obtain budget funds to create, thus providing the financial motive for Defendant, NOCCO's racketeering activities.

X. VIOLATIONS FOR CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS

791.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY,

BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' conduct violated 42 U.S. Code § 1985, Conspiracy to Interfere with Civil Rights.

XI. VIOLATIONS OF THE TRAFFICKING VICTIMS PROTECTION ACT, 42

U.S.C. §7102

792.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' conduct violated the Trafficking Victims Protection Act, 42 U.S.C. § 7102.

XII. VIOLATIONS OF THE FEDERAL AND FLORIDA WHISTLE BLOWER ACTS

793.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS,

FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' conduct violated the Federal Whistle-Blower Act, Whistle-Blower Protection Act of 1989, 5 U.S.C. 2302et seq., (Federal Whistle-Blower), and Fla. Stat. § 112.3187et seq.

COUNT I
(Violation of 18 U.S.C. § 1962(c))

794.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA re-allege and incorporate by reference herein the allegations set forth in Paragraphs one (1) through seven hundred seventy six (776) as if fully restated hereinafter.

795.

The foregoing conduct constitutes a violation of 18 U.S.C. § 1962(c).

796.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA have been injured in their property by reason of Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG,

SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' violations of 18 U.S.C. § 1962(c).

797.

The injuries suffered by Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA were caused by Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' violations of 18 U.S.C. § 1962(c).

798.

Pursuant to 18 U.S.C. § 1964(c), Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA are entitled to recover three times actual damages they have sustained and their costs of suit, including reasonable attorney's fees.

COUNT II
(Violation of Fla. Stat. § 985 et seq.)

799.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE,

MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA re-allege and incorporate by reference herein the allegations set forth in Paragraphs one (1) through seven hundred eighty one (781) as if fully restated hereinafter.

800.

The foregoing conduct constitutes a violation of Fla. Stat. § 985 et seq.

801.

Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI, JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES have acquired and maintained an interest in and control of personal property, including money, through a pattern of racketeering activity.

802.

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA, KOZERA, as a result of Defendants, NOCCO, HARRINGTON, EAKLEY, PEAKE, KRAUS, GREGORY, FOSHEY, BROWNING, SGT. JONES, ERICKSON, CORP. JONES, CHRISTENSEN, REED, ROY, HITE, BENNETT, FRICK, IRIZARRY, FONTAN, CABBAGE, MCCARTHY, BROOKS, SANBORN, TEDESCHI, MEDINA, GALASSI, MILLER, MACUMBER, MCDONALD, RAULERSON, BIRGE, MALLO, ARMSTRONG, SHOUP, DAVIS, FARRANTELLI,

JENKINS, REVELLL, COLLIER, FERGUSON, JOYAL, BECKMAN, BAIN, LOWRY and LIEUTENANT JONES' violation of Fla. Stat. § 985 et seq., are entitled to three times actual damages sustained.

PRAYER FOR RELIEF

Plaintiffs, SQUITIERI, HORNING, PEARN, STEFFENS, STARNES, HAZELTON, KRIZ, ZIEGLER, METZLER, RODGERS, BALTZER, GIBSON, SIKES, LAPE, MARCHIONE, MARIANI, BYNUM, KEPPEL, JR, SCRIMA and KOZERA demand judgment and other relief as follows:

- A. Certification of a Class pursuant to Fed. R. Civ. P. 23;
- B. Judgment in an amount equal to three times actual damages sustained by the Class, pursuant to 18 U.S.C. § 1964(c);
- C. Reasonable attorney's fees, pursuant to 18 U.S.C. § 1964(c);
- D. Judgment in an amount equal to three times actual damages sustained by the Class, pursuant Fla. Sta. § 895 et seq.;
- E. Attorney's fees in the trial and appellate courts, and costs of investigation and litigation reasonably incurred, pursuant to Fla. Sta. § 772.104 et seq.;
- F. Appropriate orders and judgments prohibiting Defendants from engaging in the violations of law alleged herein;
- G. Judgment in an amount to be proven at trial that requires the Pasco Sheriff's Office to disgorge any unlawful profits or otherwise return the full amount of its unjust enrichment;
- H. Trial by jury; and,
- I. Such relief as this Court deems necessary and appropriate.

Respectfully submitted this 19th day of June, 2019.

McGUIRE LAW OFFICES, P.A.



(P) 727-446-7659
(F) 727-446-0905
mlawoff1@tampabay.rr.com

1173 N.E. Cleveland Street
Clearwater, FL 33755
[727] 446-7659 fax: [727] 446-0905

John F. McGuire, Esq.
Florida bar No.: 0000401
McGuire Law Offices, P.A.
1173 NE Cleveland Street
Clearwater, Fl 33755

Exhibit A

PASCO SHERIFF'S OFFICE
Professional Standards**CIVILIAN MEMBER NOTICE OF INVESTIGATION**

P.S.#: 1A 2018-37

TO: Christopher Squitieri RANK/POSITION: Training Supervisor
 FROM: Detective Timothy Roy DATE: 10/22/2018

The following allegation has been received by the Pasco Sheriff's Office and is currently being investigated.

NAME OF COMPLAINANT: Melissa Hite

VIOLATION OF RULES AND REGULATIONS: G.O. 26.1.II.C (1) - Respect Towards Superiors and Subordinate Members

ALLEGATION:

It is alleged on Friday, October 19, 2018, Training Supervisor, Christopher Squitieri was speaking with HR Manager, Melissa Hite on the phone in regards to an upcoming training class for ILP Manager, Anthony Pearn. During the conversation with Manager Hite, Supervisor Squitieri, made a secondary phone call to Manager Pearn while Manager Hite remained on hold. It is alleged that during the phone conversation with Manager Pearn, Supervisor Squitieri, made multiple derogatory comments about Manager Hite in include: "She is a fucking retard, you need to print those fucking papers and walk them over to her and shove them up her twat." This conversation was overheard by more than one witness within the Human Resource Unit.

I, [Signature] ☐ ADMIT ☒ DENY ☐ NEITHER the above allegation.
(The above statement of Admission/Denial is optional for the purpose of this form.)

MEMBER ACKNOWLEDGMENT: Chris Squitieri DATE: 10/23/18

NOTICE OF A PROFESSIONAL STANDARDS INTERVIEW

This is an administrative investigation, not criminal. You are further advised that statements during this interview cannot be used against you in any subsequent criminal proceedings. As a member of the Pasco Sheriff's Office, you are required to answer questions concerning the above-listed complaint/ allegation. Agency rules and regulations direct you to cooperate with this administrative investigation and to answer all questions completely and truthfully. **Any refusal, or knowingly providing false information may result in disciplinary action, including dismissal.** The interview, including all recess periods, will be recorded and there will be no unrecorded questions or statements. Do you understand?

[Signature]
MEMBER SIGNATURE

10/23/18
DATE

[Signature]
SUPERVISOR / INVESTIGATOR

10/22/18
DATE

Pasco Sheriff's Office

COMPLAINT INVESTIGATIVE REPORT**PROFESSIONAL STANDARDS**

P.S.#: IA 2018-037

P.S. USE ONLY

ORIGIN OF COMPLAINT			
☐ CITIZEN	☐ ANONYMOUS	☐ PSO MEMBER	☒ PSO SUPERVISOR
☐ OTHER			
COMPLAINANT			
NAME: <u>Director William Hanshilwood</u>		BEST TIME TO CONTACT: _____	
DOB: _____	RACE: <u>White</u>	SEX: <u>Male</u>	
ADDRESS: _____			
HOME PHONE: _____	BUSINESS PHONE: <u>(727) 847-5878</u>	ADDITIONAL PHONE: _____	
BUSINESS ADDRESS: <u>8700 Citizens Drive, New Port Richey, Florida 34654</u>			
SYNOPSIS OF COMPLAINT			
DATE OF COMPLAINT: <u>10/19/2018</u>	TIME: <u>1524</u>	PSO OFFENSE #: _____	
DATE OF INCIDENT: <u>10/19/2018</u>	TIME: <u>1512</u>	LOCATION: <u>HR Department</u>	
MEMBER INVOLVED: <u>Christopher Squitieri</u>		VEHICLE # (If Applicable): _____	
RANK: <u>Supervisor</u>	CJIS/ID#: <u>5489</u>	COMMAND: ☐ LEO ☒ ADMINISTRATION	
BUREAU: <u>Operational Logistics</u>	DIVISION: <u>Training</u>		
ALLEGATION: It is alleged on Friday, October 19, 2018, Training Supervisor, Christopher Squitieri was speaking with HR Manager, Melissa Hite on the phone in regards to an upcoming training class for ILP Manager, Anthony Pearn. During the conversation with Manager Hite, Supervisor Squitieri, made a secondary phone call to Manager Pearn while Manager Hite remained on hold. It is alleged that during the phone conversation with Manager Pearn, Supervisor Squitieri, made multiple derogatory comments about Manager Hite in include: "She is a fucking retard, you need to print those fucking papers and walk them over to her and shove them up her twat." This conversation was overheard by more than one witness within the Human Resource Unit.			
COMPLAINT RECIPIENT			
BY: _____		CJIS/ID#: _____	DATE: _____
FORWARDED TO: _____		CJIS/ID#: _____	DATE: _____
FORWARD THE ORIGINAL TO THE MEMBER'S BUREAU COMMANDER/COLONEL FOR REVIEW OR ASSIGNMENT. FORWARD A COPY TO THE PROFESSIONAL STANDARDS UNIT WITHIN 24 HOURS OF RECEIPT. IF CORRECTIVE ACTION, COMPLETE THE INVESTIGATION AND FORWARD TO BUREAU COMMANDER/COLONEL.			
BUREAU COMMANDER REVIEW			
☐ FORWARD TO _____ FOR INVESTIGATION.		DATE: _____	
☐ FORWARD TO PROFESSIONAL STANDARDS FOR INVESTIGATION.		DATE: _____	

PSO# 10094 (2/07)

(Continued from Page 1)

PERSON RECEIVING COMPLAINT

DATE: 10/22/18

CIVIL SUITS BROUGHT BY LAW ENFORCEMENT OR CORRECTIONAL OFFICERS

Florida State Statute 112.532(3) provides that "Every law enforcement officer or correctional officer shall have the right to bring civil suit against any person, group of persons, or organization or corporation, or the head of such organization or corporation, for damages, either pecuniary or otherwise, suffered during the performance of the officer's official duties, for the abridgment of the officer's civil rights arising out of the officer's performance of official duties, or for filing a complaint against the officer which the person knew was false when it was filed."

Initial: _____

STATEMENT OF OATH

Florida State Statute 837.012 defines perjury when not in an official proceeding as a crime and established certain penalties for violation of that section. Accordingly, I advise you that whoever makes a false statement, which he or she does not believe to be true, under oath, not in an official proceeding, in regard to any material matter shall be guilty of a misdemeanor of the first degree, punishable by a term of imprisonment not exceeding 1 year.

Initial: _____

I, William T. Henshaw, swear or attest that all the information I provide during this administrative investigation will be complete and accurate.

Signature of Complainant / Witness

Date

STATE OF FLORIDA, COUNTY OF PASCO

The foregoing instrument was acknowledged before me this 22 day of October, 2018
by William Henshaw who produced known as identification, and who
did take an oath.

Signature of Notary Public

Print Name of Notary Public

Exhibit B



John F. McGuire, ESQ.
Trial Attorney
Also admitted in the U.S. Supreme Court
Million Dollar Advocates Forum
Licensed in Federal Court
Larry C. Hoffman, ESQ.
Trial Attorney
Gino A. Megna, ESQ.
Trial Attorney
Licensed in Federal Court

McGUIRE
L A W
OFFICES
A Professional Association

1173 N.E. Cleveland Street
Clearwater, Florida 33755
Phone (727) 446-7659
Toll Free (877) 64-IRISH
Fax (727) 446-0905

March 25, 2019

Via Email & US Mail

Pasco Sheriff's Office
Attn: Lindsay Moore, Esq.
8700 Citizen Drive
New Port Richey, FL 34654

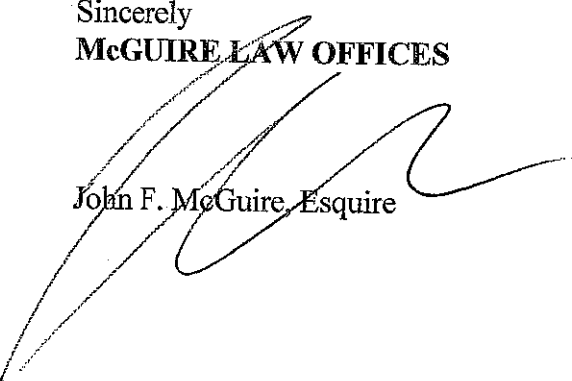
lmoore@pascosheriff.org

Re: **Anthony Pearn (Request for Criminal Investigation)**

Dear Ms. Moore:

I have received your responsive letter dated March 12, 2019 denying our request for criminal investigation. Enclosed you will find Mr. Pearn's phone records which shows he received a call on October 20, 2018 at 11:45am from Colonel Jeff Harrington's personal cell phone number, 727-992-4576. This is evidence of the first instance of witness tampering. I believe that a subpoena of phone records of all calls made and/or received within three (3) hours of that call, between Colonel Jeff Harrington and any Pasco Sheriff's Office personnel will be evidence of the co-conspirators of the criminal activity of witness tampering. If you have any further questions you can call my office.

Sincerely
McGUIRE LAW OFFICES


John F. McGuire, Esquire





Billing period Sep 27, 2018 to Oct 26, 2018 | Account # [REDACTED] | Invoice # 775763127

Anthony Pearn

479.653.5434 | iPhone 6S

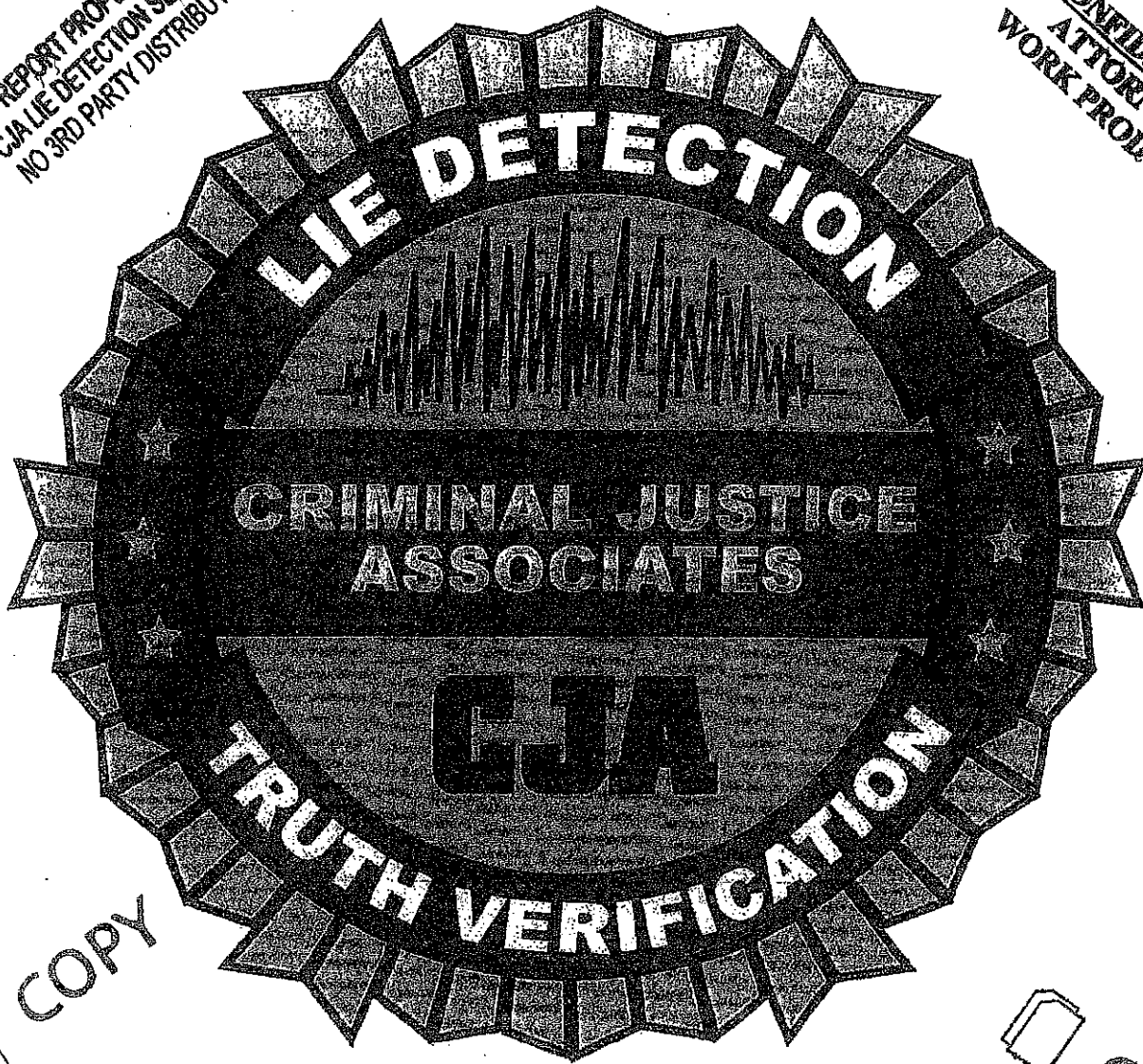
Talk activity - continued

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
Oct 20	11:45 AM	727.992.4576	Hudson, FL	Newprichy, FL	3			

Exhibit C

REPORT PROPERTY OF
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COPY

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11/06/2018
REPORT OF EXAMINATION
RE: Chris Squitieri

NOTE: BEFORE USING ANY MATERIALS OBTAINED THROUGH CRIMINAL JUSTICE ASSOCIATES, YOU SHOULD CAREFULLY READ THE TERMS AND CONDITIONS SET FORTH ON THE REVERSE SIDE OF THIS REPORT. USE OF THE MATERIALS PROVIDED CONSTITUTES YOUR ACCEPTANCE OF THESE TERMS AND CONDITIONS.

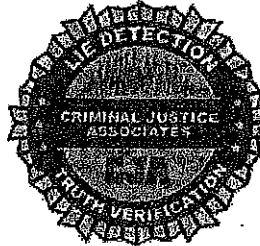
Exhibit A

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CJA
LIE DETECTION
SERVICES

REPORT OF EXAMINATION

P.O. BOX 780328
ORLANDO, FLORIDA 32878
(407)583-4080 (800)224-1320

Predication

This truth verification examination was predicated upon a request from Chris Squitieri and the MaGuire Law Firm.

Scope

The scope of this truth verification examination shall be limited to Chris Squitieri's honesty in regards to administrative allegations filed against him in Pasco County FL. The person claiming allegations of misconduct and improper language is MELISSA HITE (Pasco County Employee)

Credibility Assessment Instrument

CVSA (Computer Voice Stress Analyzer)

Our firm uses more than one credibility assessment instrument to include Computerized Polygraph, CVSA, VIPRE VSA & EyeDetect system. Many LE agencies in Florida are using either the CVSA or VIPRE VSA to include Pinellas County FL Sheriff, Clearwater FL PD, Pinellas Park FL PD as a few local agencies. In terms of legal acceptance the 8th and 12th Circuits in FL approved usage of the CVSA & VIPRE VSA instruments on an equal basis to polygraph in testing sex offenders. In early 2018 the CVSA and VIPRE VSA exam results were accepted into evidence in a final sentencing hearing in the Northern District of FL (Criminal Division). I was the examiner involved in all of the cases referenced.

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Page (2) of (3)
Report of Examination
Chris Squitieri
11/06/2018

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PRETEST INTERVIEW

On 11/06/2018 Greg Roebuck, Certified Examiner administered this truth verification examination at the Tampa Area Office located at 550 North Reo Street - Suite #300 Tampa FL 33609. The examination was conducted on Chris Squitieri. He identified himself with a FL ID and signed the proper legal release form prior to the examination. He was briefed on the operation of the CVSA (*Computer Voice Stress Analyzer*) and what was expected of him during the exam process. The purpose of this examination was to address administrative allegations filed by PASCO County FL government that involved a female employee named MELISSA HITE. Mr. Squitieri denied any unprofessional conduct or the usage of profanity against MELISSA HITE at any time.

EXAMINATION

I utilized a (11) Question General Series Examination that featured (3) Relevant questions. The remaining were Control and Irrelevant questions that were interspersed with the Relevant questions. CVSA, VIPRE VSA, & Polygraph exams all use a combination of Relevant, Irrelevant, & Control questions per exam protocols.

R4 - Have you ever been unprofessional in your dealings with Melissa Hite? NO

R6 - Have you ever used profanity in your dealings with Melissa Hite? NO

R10 - Did you use profanity of an extreme nature against Melissa Hite on Oct 19 2018? NO

Following the initial chart, a second chart was conducted utilizing the same format as the initial examination as well as the same relevant and control questions. Upon completion of the 2nd chart and final analysis I scored the exam as: NDI - No Deception Indicated (NDI) It should be noted that in R#10 the word extreme was not spelled correctly which has NO Impact on the exam results. This was input error only. This could not be changed as the system does not allow changes as to maintain exam integrity. All of the questions asked on this truth verification examination are included in this report. I have circled the Relevant questions in RED.

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Page (3) of (3)
Report of Examination
Chris Squitieri
11/06/2018

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CONCLUSION

Based upon my training and experience, it is my expert opinion that Chris Squitieri respond truthfully in regards to this examination. We are maintaining a copy of this report on file for a period of 1-year. There is no legal requirement in terms of record retention for lie detection -truth verification exam results in FL. There is a 3 year requirement to retain exam reports if they were conducted under the guidelines of the EPPA (*Employee Polygraph Protection Act*) This exam does not fall under those guidelines.



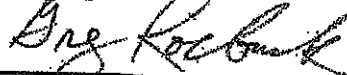
Greg Roebuck
Certified CVSA & VIPRE VSA Examiner
U.S. District Court Certified Expert
Human Resources Specialist (Govt & Corporate)

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American Probation & Parole Association
International Association of Interviewers
International Association of Voice Stress Analysts
SHRM-Society of Human Resource Management
National Homicide Investigators Association
National Association of Internal Affairs Investigators

CVSA- VIPRE VSA EXAMINATION

☒ NDI - No Deception Indicated ✓
☐ DI - Deception Indicated



CERTIFIED EXAMINER

TAMPA BAY OFFICE
(813) 902-3275



COPY

Case 8:19-cv-00906-JSM-AAS Document 7 Filed 06/20/19 Page 241 of 427 PageID 855
Date: 06 November 2018
Test Format: GENERAL SERIES
Test Medium: Manual
Time Began: 11:25:04 AM
Requested: JOHN MAGUIRE ESQUIRE
Case Number: NOV2018PSCADM
Verification: N/A
Confession:
Time Ended: 12:28:04 AM
Examiner: ROEBUCK
Type of Test: Suspect
Offense: ADMIN COMPLAINT
Subject: SQUITIERI
Outside Agency: CJA LIE DETECTION SERVICES
CVSA Unit Number: Tampa Area Office
Cold Call: Concurred
Deception: Not Indicated

1. (IR) Is your name Chris? YES
2. (C) Is the color of my desk Brown? NO
3. (IR) Are you sitting down? YES
4. (R) Have you ever been unprofessional in your dealings with Melissa Hite? NO
5. (IR) Is today Tuesday? YES
6. (R) Have you ever used profanity in your dealings with Melissa Hite? NO
7. (IR) Am I wearing glasses? YES
8. (C) Have you ever driven over the posted speed limit? NO
9. (IR) Is this the month of November 2018 YES
10. (R) Did you use profanity of an extreme nature against Mellissa Hite on Oct 19th 2018? NO
11. (IR) Are we in the state of FL? YES

CONFIDENTIAL
ATTORNEY
WORK PRODUCT

CVSA - VIPRE VSA EXAMINATION

☒ **NDI - No Deception Indicated**
☐ **DI - Deception Indicated**


CERTIFIED EXAMINER

REPORT PROPERTY OF
CJA LIE DETECTION SERVICES
NO 3RD PARTY DISTRIBUTION

CONFIDENTIAL
ATTORNEY
WORK PRODUCT

TAMPA BAY OFFICE
(813) 902-3275



COPY

Exhibit D



John F. McGuire, ESQ.
Trial Attorney
Also admitted in the U.S. Supreme Court
Million Dollar Advocates Forum
Licensed in Federal Court

Larry C. Hoffman, ESQ.
Trial Attorney

Gino A. Megna, ESQ.
Trial Attorney
Licensed in Federal Court

McGUIRE
L A W
OFFICES
A Professional Association

1173 N.E. Cleveland Street
Clearwater, Florida 33755
Phone (727) 446-7659
Toll Free (877) 64-IRISH
Fax (727) 446-0905

November 6, 2018

Christopher Nocco
8700 Citizen Drive
New Port Richey, FL 34654

Re: Supervisor Christopher Squitieri

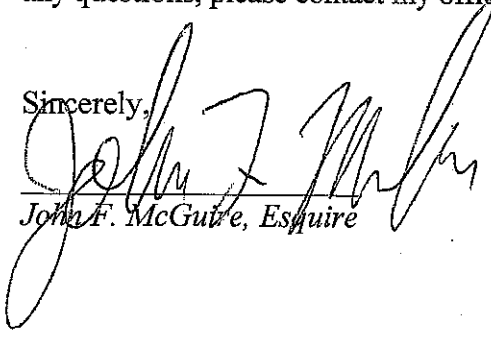
Dear Mr. Nocco:

Please be advised that my office represents Mr. Christopher Squitieri in a false allegation of misconduct. Mr. Squitieri has taken a polygraph test which clearly indicates that the accuser Melissa Hite filed a sworn affidavit that is false. We hereby request that Ms. Hite be placed on administrative leave for this false charge until the investigation is completed.

Mr. Squitieri's officer Bill of rights were violated by the investigator Detective Roy, which is a misdemeanor in the State of Florida. The alleged incident occurred while Mr. Squitieri was working under full authority of the Pasco Sheriffs office in uniform as a sworn Deputy Sheriff. Deputy Squitieri was deployed as a Deputy to Lynn Haven, FL during the after math of Hurricane Michael. He is entitled protection under the Officer Bill of Rights.

Deputy Squitieri was put on leave for not turning over his private phone which contains Attorney Client Privilege information due to a forthcoming divorce, as well as his 4th Amendment right. This is a clear act of retaliation by Ms. Hite given the circumstances of her deficient paperwork to FDLE while she was working with Deputy Squitieri. We are requesting Deputy Squitieri be immediately reinstated and all alleged violations be immediately closed out. If you have any questions, please contact my office.

Sincerely,


John F. McGuire, Esquire





CHRIS NOCCO, SHERIFF

OFFICE OF THE SHERIFF

TEAMWORK ♦ PROFESSIONALISM ♦ SERVICE

November 8, 2018

McGuire Law Offices
ATTN: John F. McGuire, Esq.
1173 N.E. Cleveland Street
Clearwater, FL 33755

RE: Christopher Squitieri

Dear Mr. McGuire,

The Pasco Sheriff's Office is in receipt of your correspondence dated November 6, 2018, regarding your client Christopher Squitieri. Your letter is wholly inaccurate and each false allegation will be addressed.

Your first inaccurate allegation is that Mr. Squitieri is entitled to protection under the Police Officer Bill of Rights (BOR), and that his rights were violated. Please be advised that Mr. Squitieri holds the position of a civilian training supervisor with the Pasco Sheriff's Office. Florida Statute 112.531 defines "law enforcement officer" for purposes of the BOR as a person who is employed full time by any political subdivision of the state, and whose primary responsibility is the prevention and detection of crime or the enforcement of the penal, traffic, or highway laws of this state. Mr. Squitieri is neither employed full-time by the Pasco Sheriff's Office as a law enforcement officer, nor are his primary responsibilities enforcement of the penal or traffic laws of this state. Mr. Squitieri's deployment to the Florida panhandle to provide hurricane-related assistance has no bearing on his status as a civilian non-full time law enforcement officer. Additionally, despite being in the panhandle, Mr. Squitieri was acting in his capacity as a civilian training supervisor at the time of the action in which he engaged that is the subject of the administrative investigation. As such, the BOR does not apply to Mr. Squitieri, and thus no violation of rights has occurred.

Notwithstanding the fact the BOR does not apply to your client, your second false allegation is that a violation of the BOR is a misdemeanor in the State of Florida. Florida Statute 112.534 clearly outlines the recourse for an alleged violation of the BOR, and nowhere in that section does it state a violation is a misdemeanor. In fact, the only mention of a misdemeanor violation in the

PASCO SHERIFF'S OFFICE

Sheriff's Administration
8700 Citizens Drive
New Port Richey, FL 34654
727-847-5878

District I
7432 Little Road
New Port Richey, FL 34654
727-847-5878

District II
36409 State Road 52
Dade City, FL 33525
352-518-5000

District III
11630 Trinity Blvd
Trinity, FL 34655
727-372-5920

Pasco Detention Center
20101 Central Blvd
Land O' Lakes, FL 34637
813-996-6982

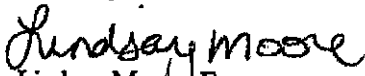
BOR is found in Florida Statute 112.533, which provides in subsection (4) that a violation related to a public records release of an active investigation, not a BOR violation, is a misdemeanor.

Your third false allegation is that Mr. Squitieri was put on administrative leave for not turning over his personal phone as an act of retaliation by Melissa Hite. Ms. Hite did not make the decision to place Mr. Squitieri on administrative leave, nor was it done for the reasons stated in your correspondence. Pasco Sheriff's Office General Order 26.2 Section V (a copy of which is enclosed for your reference) clearly outlines which agency members have authority to place members on administrative leave, and the authorized reasons for doing such. Mr. Squitieri was placed on administrative leave as he is the subject member of an administrative investigation.

Lastly, you indicate the results of a polygraph test taken by Mr. Squitieri, which was not an official part of the administrative investigation, indicate that Ms. Hite filed a false sworn affidavit. First, Ms. Hite did not file a sworn written affidavit in this matter. Additionally, any statements made by Mr. Squitieri about a third party during an unverified polygraph test would be entirely his opinion, and would not factually prove anything related to statements made by Ms. Hite. Lastly, as I am sure you are aware, polygraph tests are inadmissible as evidence.

In the future, I would encourage you to use due diligence in conducting a thorough investigation into matters before making baseless and irresponsible allegations. Mr. Squitieri will remain on administrative leave in relation to his status as a subject member of an administrative investigation.

Sincerely,



Lindsay Moore Esq.
Chief, Management Services Bureau
General Counsel

enclosure

Exhibit E

March 1, 2019

Sheriff Christopher Nocco
8700 Citizens Drive
New port Richey, FL 34654

Dear Sherriff Nocco,

Please accept this correspondence as my formal notice of violation of my Law Enforcement Officers Bill of Rights and formal written request for the following:

- Request to reopen the investigation of IA 2018-037.
- Request for a compliance review hearing for IA 2018-037.
- Request for a compliance review hearing for IA 2018 -045.

At this time, I request the above mentioned actions due to discovery of new evidence, improper conduct on behalf of Investigator Timothy Roy, Manager Melissa Hite, HR Specialist Christopher Bennett and HR Director Tiffani Reed and the intentional violation of my rights as outlined in the Law Enforcement Officers Bill of Rights, Fla. Stat. § 112.532.

For your review, I have attached a copy of my pre disciplinary hearing statement including the attached Exhibit A, polygraph examination results for IA 2018-037, the original statements of complaints that were filed with the Office of Professional Standards on January 27, 2019 and January 30, 2019 along with the written correspondence I received from Inspector Jennifer Christensen which confirms receipt of said complaints and notification of processing.

Furthermore, pursuant to Pasco Sheriff's Office General Order 26.2, I am formally requesting to voluntarily submit to a device measuring truth responses and the admittance for IA2018-037 as well as the pending IA-2018-045. Pursuant to IA 2018-037; in the alternative, I request the admittance of the attached polygraph examination results dated November 06, 2018.

Sincerely,
Deputy Christopher Squitieri

I am filling an official IA complaint against Jeff Harrington for tampering with an internal investigation and intimidating a witness. Additionally, I will provide information regarding violation of federal whistle blower protection act. I feel these two are directly related so I will address these in chronological order.

The week of Oct. 8th I was in charge of the ILP division while the director was out of town. I became aware of an incident involving a citizen who made a post on facebook about Deputy Carmack. The citizen (whose information I have) posted a mug shot picture of the deputy on her facebook. I received a call from Major Peake asking me questions about the incident. He asked if she did anything illegal that she could be arrested for. I stated that the pic was accessed via the Pinellas County site and she had not committed any law violations. He then asked that I obtain any and all information pertaining to her and all of her family. Peake went on to state that, "we cannot let someone say bad shit about the sheriff's office, we need to lock her up." I stated that what she posted was actually true since the deputy was arrested but he was clearly not happy.

Throughout the day he contacted me via cell at least five times asking for updates and if we had anything to arrest her on. He requested that I notify SIU detectives and have them begin conducting surveillance on her and her family and arrest them all. I have always prided myself on having the moral courage to stand up for what is right and I informed Peake that I was not comfortable with this activity and targeting citizens for posting derogatorily and true statements seemed like a misuse of power and unethical. He informed me that he would just deal with the SIU Sgt. Direct "because it would be easier."

Approx. one week later I had an in-person conversation with Col. Jeff Harrington and I informed him of all the details of this incident and stated I was not comfortable having the Intelligence division being used as an unethical tool to abuse the Sheriff's power. He acted upset about the incident and "said he would look into it." He then went on to say that maybe I would be happier working in a different division at the agency or maybe the agency was not a good fit for me. I left feeling that I would be moved and/or punished for addressing these violations.

On Sat. October 20th at 1145 hrs Jeff Harrington called me from his personal cell phone on my cell phone (which I have copies and attached). He stated that IA was launching an investigation against Chris Squiterie and I needed to make sure I told the truth. I responded that of course I would. He then stated, "you better tell the truth and you will be ok and everything should be ok for you." He went on to state that no matter how painful the truth was that I needed to cooperate and the Sheriff fires people for being dishonest. I took this as a direct threat from the Colonel of the agency. This is in direct violation of agency policy.

On 10/22/2018 IA went to the SPC and interviewed me as a witness. On 10/23/2018 they returned. When they asked to interview me again I said, I thought we cleared up anything yesterday why are you back, Det. Roy responded, the Colonel sent us back to down to see if your story was the same. Again, I could only see this as a threat and the Colonel violating policy and interfering with an investigation.

The other facts of this case are readily available. I was terminated on 11/6/2018 without cause. When I asked why I was being terminated Larry Kraus said I did not meet the terms of my probationary employment. I responded that I received a glowing written evaluation one week prior from him and that did not make sense at all. He responded that this did not come from me this came from the Colonel.

It is clear to me that Jeff Harrington tampered with the investigation, tampered with a witness, and terminated me. All of this is directly related to the fact that I was a Whistle Blower and brought unethical and illegal activities of Major Jeff Peake to him. Harrington used this as a fake reason to terminate me. This can be easily proven and has been throughout witness testimony and my evidence of emails and phone conversations.

I am filing an official Whistle Blower violation with the state attorney general's office as well as other legal avenues.

***** It is extremely vital to point out that I could have provided my cell phone records to IA to prove that DID NOT have conversations with Squiterie surrounding the alleged time frame of his alleged comments HOWEVER I did not do so as to protect Harrington. I knew that he called me and his phone is logged in my call logs- clearly tampering with an internal investigation and at that time I still wanted to protect him due to previous associations.

I have attached a screen shot from my call log to prove this to this email.

I am filling an official IA complaint on the director of Human Resources, Taffany Reed.

On 10/31/2018 I sent an email (attached) to Reed outlining numerous violations occurring that were all HR related. The email addresses the issues in detail and Reed failed to take action OR RESPOND at all to my issues. This is a gross dereliction of duty.

Additionally, Reed was in direct violation of the federally protected FMLA leave policy. On October 26th, 2018 I placed a vacation leave request on my then supervisor's desk (Larry Kraus) for Nov. 5-9th. I was placed on admin. Leave that day and I was unable to obtain a copy of my request. I could only assume that it was approved because I was already not at work on administrative leave. Additionally, Kraus verbally informed me it was approved when I left on admin. Leave.

I was taking leave for personal reasons relating to FMLA but was going to use vacation leave as to keep it private. On 11/05/2018 Det. Roy contacted me and said he needed me to come into the office with an hour. I informed him I was on vacation leave. He stated that I did not have any leave "on the books." I informed him that my leave was with my supervisor. Det. Roy then called me back approx.. 15 mins later and stated that he spoke with Kraus and Kraus stated that he never got a leave slip from me. This was a blatant lie which will also be addressed. Det. Roy then stated that even if I did have leave that my leave was cancelled and I was ordered to return to the office. I informed him that I would be on FMLA sick leave and not able to return. Prior to

Roy calling me back I emailed the HR director, Reed, and informed her that I was out on sick leave. Federal law states that FMLA leave can be taken intermittently and serve psychological stress and depression is a valid legal reason to use sick time and FMLA. Not only did Reed not pass this information along, I was terminated during my FMLA leave.

I am making an official IA complaint on Det. Roy for dereliction of duty and ethics violations for misrepresenting findings in an investigation.

During on interview on 10/23/18 Roy stated, "you already changed your story once, now which one is it." He then stated that in my memo I stated that Chris Squiterie conducted himself professionally then during my interview I stated that he did say swear words during the daytime. Additionally, in the administrative summary Roy makes false statements eluding to the fact that I waived on my statements. I went into detail in the interviews to explain that saying swear words not related to HR is not unprofessional. I also went on to say that I have heard the Sheriff and the Colonel as well all the command staff swear on a weekly basis. I used this as an example to state that someone can be professional and act professional and still swear. Det. Roy also stated, I have dropped the F-bomb about 17 times during this interview.!!

This is a game a semantics and misrepresentation of facts and a play on words to come to an outcome they wanted. My statement that Squiterie was professional was accurate. My statement that he may have used swear words throughout the day was also accurate, I never waived on this in the slightest way. This was highly unethical and a blatant lie on behalf of Roy.

My attorney obtained the transcripts and recordings of the interviews and this is 100% false and a misrepresentation of the entire investigation. I then went on clear up that to me swearing was not unprofessional and I meant that. Roy attempted to misrepresent the facts of witness testimony and went far above the scope of an internal investigation in harassing a witness. The harassment I encountered during the investigation is well documented with emails and calls to numerous individuals in the agency. It is not normal to interview a witness to an allegation 3 times, place them on admin. Leave, terminate their training, then terminate them, all without cause.

The executive summary was 100% false and a misrepresentation of what was ACTUALLY said and written. Since someone can be both professional and swear, as highlighted by the example with the Sheriff. It would be like asking me if the Sheriff conducted himself professionally – I would say yes of course. The ask me if I have ever heard him curse and my answer will also be yes! The IA taking those words and twisting it to mean to THEM that – he cannot be professional AND curse- but that was not the question!!!! Roy, made this accusation against me knowing that it was false- all anyone has to do is hear the tapes where I go into great detail to give examples.

Exhibit F



CHRIS NOCCO, SHERIFF
PASCO SHERIFF'S
OFFICE

TEAMWORK ♦ PROFESSIONALISM ♦ SERVICE

March 12, 2019

Christopher Squitieri
11813 Trevally Loop #301
New Port Richey, FL 34655

RE: Notice of Violation of Law Enforcement Officers Bill of Rights:
IA # 2018-037
IA # 2018-045

Dear Mr. Squitieri,

Sheriff Nocco has received your notice of violation of law enforcement officers bill of rights for IA # 2018-037 and #2018-045 and request for compliance review hearings; your request to re-open the investigation of IA #2018-037; and your request to voluntarily submit to a truth-measuring device test and admit the results as part of the investigation of IA #2018-037 (or admit your previous CVSA test results) and #2018-045.

With regard to your request to re-open the investigation of IA #2018-037, there is no provision under PSO General Orders nor Florida statutes mandating such. The investigation is complete and you participated in a Pre-Disciplinary Hearing. Your request is therefore denied.

With regard to your notice of violation of law enforcement officers bill of rights and request for compliance review hearing in IA #2018-037 and IA #2018-045, please be advised Chapter 112, Florida Statutes, known as the "Law Enforcement Officers Bill of Rights," does not apply to you. Your position with PSO is a civilian Training Supervisor and a part-time Reserve II deputy, and as such, you do not meet the requirements of a "law enforcement officer" under Florida Statute 112.531 (see *Hinn v. Beary*, 701 So.2d 579 (Fla. 5th DCA 1997)). Further, even in the event the LEO Bill of Rights did apply to you, your notice fails to comply with the requirements of Florida Statute 112.534 subsections (1)(a), (b), and (c). Your request is therefore denied.

Sheriff's Administration
8700 Citizen Drive
New Port Richey, FL 34654
727-847-5878

District I
7432 Little Road
New Port Richey, FL 34654
727-847-5878

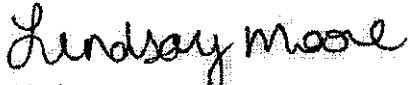
District II
36409 State Road 52
Dade City, FL 33525
352-518-5000

District III
11530 Trinity Boulevard
Trinity, FL 34655
727-372-5920

Pasco Detention Cent
20101 Central Bouleva
Land O' Lakes, FL 34665
813-996-6982

With regard to your request to voluntarily submit to a truth-measuring device test and admit the results as part of the investigation of IA #2018-037 (or admit your previous CVSA test results) and #2018-045, your request is denied.

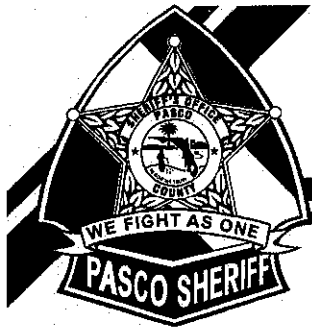
Sincerely,

A handwritten signature in black ink that reads "Lindsay Moore". The signature is written in a cursive, flowing style.

Lindsay Moore, Esq.
Chief, Management Services Bureau
General Counsel

cc: John McGuire, Esq.

Exhibit G



CHRIS NOCCO, SHERIFF
PASCO SHERIFF'S OFFICE

TEAMWORK • PROFESSIONALISM • SERVICE

March 13, 2019

Supervisor Christopher Squitieri
8700 Citizens Drive
New Port Richey, FL 34654

RE: IA 2018-037

Supervisor Squitieri:

I have carefully reviewed and considered all the available documents and information regarding the above referenced administrative investigation completed by the Professional Standards Unit. It is my determination the final disposition and level of discipline for this case to be as follows.

This complaint involved an alleged violation of General Order 26.1, Standards of Conduct, Section II, Subsection C., (1), Respect Towards Superiors and Subordinate Members. The charge is sustained. You are hereby suspended for two (2) days (16 hours) without pay. Captain Jared Hill will schedule the dates for you to serve your suspension.

Please be advised a future violation of this General Order may result in further discipline, up to and including termination. Please sign and return a copy of this letter to verify your receipt of same, copy attached.

Respectfully,

George McDonald, Chief
Joint Operations Bureau

GM/sb
attachment

cc: Professional Standards Unit

Member's Signature

3/13/19

Date Received

Sheriff's Administration
8700 Citizens Drive
New Port Richey, FL 34654
727-847-5878

District I
7432 Little Road
New Port Richey, FL 34654
727-847-5878

District II
36409 State Road 52
Dade City, FL 33525
352-518-5000

District III
11530 Trinity Boulevard
Trinity, FL 34655
727-372-5920

Pasco Detention Center
20101 Central Boulevard
Land O'Lakes, FL 34637
813-996-6982

Exhibit H

PROFESSIONAL STANDARDS

P.S.#: IA 2018-045 (B)

P.S. USE ONLY

ORIGIN OF COMPLAINT

☐ CITIZEN ☐ ANONYMOUS ☐ PSO MEMBER ☒ PSO SUPERVISOR ☐ OTHER

COMPLAINANT

NAME: Inspector Jennifer Christensen BEST TIME TO CONTACT: _____
DOB: _____ RACE: White SEX: Female
ADDRESS: _____
HOME PHONE: _____ BUSINESS PHONE: (727) 815-7117 ADDITIONAL PHONE: _____
BUSINESS ADDRESS: 8700 Citizens Drive, New Port Richey, Florida

SYNOPSIS OF COMPLAINT

DATE OF COMPLAINT: 9/12/2018 TIME: 0900 PSO OFFENSE #: 2018-37852
DATE OF INCIDENT: 9/11/2018 TIME: _____ LOCATION: PHSC Driving Pad
MEMBER INVOLVED: Christopher Squitieri VEHICLE # (If Applicable): _____
RANK: Supervisor CJIS/ID#: 5489 COMMAND: ☐ LEO ☒ ADMINISTRATION
BUREAU: Operational Logistics DIVISION: Training

ALLEGATION:

On Tuesday, September 11, 2018, Training Supervisor, Christopher Squitieri, was assigned as the "Lead Driving Instructor" for the PHSC Law Enforcement Academy, class 107. It is alleged that Supervisor Squitieri knowingly falsified a "CMS Vehicle Operations Performance Evaluation" form on Cadet Kati Cage while testing the cadet on the "Intersection Backing" driving course. Supervisor Squitieri is alleged to have documented that Cadet Cage completed four (4) successful test runs while completing the Intersection Backing course; however, Cadet Cage and a witness stated she only completed three (3) of the required four (4) test runs.

COMPLAINT RECIPIENT

BY: _____ CJIS/ID#: _____ DATE: _____
FORWARDED TO: _____ CJIS/ID#: _____ DATE: _____

**FORWARD THE ORIGINAL TO THE MEMBER'S BUREAU COMMANDER/COLONEL FOR REVIEW OR ASSIGNMENT.
FORWARD A COPY TO THE PROFESSIONAL STANDARDS UNIT WITHIN 24 HOURS OF RECEIPT.
IF CORRECTIVE ACTION, COMPLETE THE INVESTIGATION AND FORWARD TO BUREAU COMMANDER/COLONEL.**

BUREAU COMMANDER REVIEW

☐ FORWARD TO _____ FOR INVESTIGATION. DATE: _____
☐ FORWARD TO PROFESSIONAL STANDARDS FOR INVESTIGATION. DATE: _____

PROFESSIONAL STANDARDS

P.S.#: IA 2018-045 (A)

P.S. USE ONLY

ORIGIN OF COMPLAINT

☐ CITIZEN ☐ ANONYMOUS ☐ PSO MEMBER ☒ PSO SUPERVISOR ☐ OTHER

COMPLAINANT

NAME: Inspector Jennifer Christensen BEST TIME TO CONTACT: _____
 DOB: _____ RACE: White SEX: Female
 ADDRESS: _____
 HOME PHONE: _____ BUSINESS PHONE: (727) 815-7117 ADDITIONAL PHONE: _____
 BUSINESS ADDRESS: 8700 Citizens Drive, New Port Richey, Florida

SYNOPSIS OF COMPLAINT

DATE OF COMPLAINT: 9/12/2018 TIME: 0900 PSO OFFENSE #: 2018-37852
 DATE OF INCIDENT: 9/11/2018 TIME: _____ LOCATION: PHSC Driving Pad
 MEMBER INVOLVED: Christopher Squitieri VEHICLE # (If Applicable): _____
 RANK: Supervisor CJIS/ID#: 5489 COMMAND: ☐ LEO ☒ ADMINISTRATION
 BUREAU: Operational Logistics DIVISION: Training

ALLEGATION:

On Tuesday, September 11, 2018, Training Supervisor, Christopher Squitieri, was assigned as the "Lead Driving Instructor" for the PHSC Law Enforcement Academy, class 107. It is alleged that Supervisor Squitieri knowingly falsified a "CMS Vehicle Operations Performance Evaluation" form on Cadet Shannon Conover while testing the cadet on the "Intersection Backing" driving course. Supervisor Squitieri is alleged to have documented that Cadet Conover completed four (4) successful test runs while completing the Intersection Backing course; however, Cadet Conover and a witness statd she only completed two (2) of the required four (4) test runs.

COMPLAINT RECIPIENT

BY: _____ CJIS/ID#: _____ DATE: _____
 FORWARDED TO: _____ CJIS/ID#: _____ DATE: _____

**FORWARD THE ORIGINAL TO THE MEMBER'S BUREAU COMMANDER/COLONEL FOR REVIEW OR ASSIGNMENT.
 FORWARD A COPY TO THE PROFESSIONAL STANDARDS UNIT WITHIN 24 HOURS OF RECEIPT.
 IF CORRECTIVE ACTION, COMPLETE THE INVESTIGATION AND FORWARD TO BUREAU COMMANDER/COLONEL.**

BUREAU COMMANDER REVIEW

☐ FORWARD TO _____ FOR INVESTIGATION. DATE _____
☐ FORWARD TO PROFESSIONAL STANDARDS FOR INVESTIGATION. DATE _____

PROFESSIONAL STANDARDS

PS.#: IA 2018-045 (C)

P.S. USE ONLY

ORIGIN OF COMPLAINT

☐ CITIZEN ☐ ANONYMOUS ☐ PSO MEMBER ☒ PSO SUPERVISOR ☐ OTHER

COMPLAINANT

NAME: Inspector Jennifer Christensen BEST TIME TO CONTACT: _____
DOB: _____ RACE: White SEX: Female
ADDRESS: _____
HOME PHONE: _____ BUSINESS PHONE: (727) 815-7117 ADDITIONAL PHONE: _____
BUSINESS ADDRESS: 8700 Citizens Drive, New Port Richey, Florida

SYNOPSIS OF COMPLAINT

DATE OF COMPLAINT: 9/12/2018 TIME: 0900 PSO OFFENSE #: 2018-37852
DATE OF INCIDENT: 9/11/2018 TIME: _____ LOCATION: PHSC Driving Pad
MEMBER INVOLVED: Christopher Squitieri VEHICLE # (If Applicable): _____
RANK: Supervisor CJIS/ID#: 5489 COMMAND: ☐ LEO ☒ ADMINISTRATION
BUREAU: Operational Logistics DIVISION: Training

ALLEGATION:

On September 11, 2018, it is alleged Supervisor Squitieri knowingly falsified at least two "CMS Vehicle Operations Performance Evaluation" FDLE forms on two cadets that completed the "Intersection Backing" driving course, which was witnessed by Sergeant Browning. The following day, Supervisor Squitieri was confronted by Sergeant Browning to correct the issue. Supervisor Squitieri denied the allegations and is alleged to have inappropriately addressed the cadets regarding the conflict. Sergeant Browning and Supervisor Squitieri then became involved in a verbal dispute in front of the academy cadets to the point where another instructor had to intervene. Sergeant Browning then reported the issue to Pasco Hernando State College Law Enforcement Academy administration. These alleged actions initiated a criminal investigation where Supervisor Squitieri was found to have falsified documents on the two cadets.

COMPLAINT RECIPIENT

BY: _____ CJIS/ID#: _____ DATE: _____
FORWARDED TO: _____ CJIS/ID#: _____ DATE: _____

FORWARD THE ORIGINAL TO THE MEMBER'S BUREAU COMMANDER/COLONEL FOR REVIEW OR ASSIGNMENT.
FORWARD A COPY TO THE PROFESSIONAL STANDARDS UNIT WITHIN 24 HOURS OF RECEIPT.
IF CORRECTIVE ACTION, COMPLETE THE INVESTIGATION AND FORWARD TO BUREAU COMMANDER/COLONEL.

BUREAU COMMANDER REVIEW

☐ FORWARD TO _____ FOR INVESTIGATION. DATE _____
☐ FORWARD TO PROFESSIONAL STANDARDS FOR INVESTIGATION. DATE _____

P.S.#: IA 2018-045

(P.S. USE ONLY)

COMPLAINANT / WITNESS NAME: Inspector Jennifer Christensen

DOB: _____

HOME ADDRESS: _____

BUSINESS ADDRESS: 8700 Citizens Drive, New Port Richey, Florida 34654

HOME PHONE: () _____

BUSINESS PHONE: (727) 815-7117

ADD'L PHONE: () _____

DETAILS OF INCIDENT

(Please provide name and contact information for any witnesses.)

On Tuesday, September 11, 2018, Supervisor Squitieri was assigned as the "Lead Driving Instructor" for the Pasco Hernando State College, Law enforcement Academy, class # 107. Thirteen cadets were scheduled to practice and test various driving courses for the day. Supervisor Squitieri provided driving instructions for the "Intersection Backing" course along with Corporal Robert Gartenberg. Tampa Police Department Officer Kris Babino was also providing instruction to various cadets on a separate "Intersection Backing" course, while Sergeant James Browning provided instruction at a "Tactical Backing" course. All the courses were conducted on the same driving pad, and within 100-200 feet of each other.

During the day, Sergeant Browning noticed Cadet Shannon Conover began her testing phase with Supervisor Squitieri and decided to watch her test as she was having trouble with the course and was given extended practice time. Sergeant Browning noted that Cadet Conover completed two (2) of the FDLE required four (4) test runs prior to exiting the vehicle and responding to his course. Sergeant Browning also indicated that Cadet Conover expressed her excitement for only having to complete the course "two times." Sergeant Browning then received a phone call from TPD Officer Babino, who inquired about Supervisor Squitieri getting through his group of cadets so quickly. Sergeant Browning then witnessed three other cadets in Supervisor Squitieri's group complete less than the FDLE required four (4) test runs. Sergeant Browning documented his observations on a notepad. Sergeant Browning stated when the cadets arrived to his driving exercise, the FDLE test forms indicated all four (4) cadets successfully completed all of the required practice/test runs for the "Intersection Backing" course being scored by Supervisor Squitieri and Corporal Gartenberg's group.

On 9/12/2018, Sergeant Browning confronted Supervisor Squitieri about his observations along with the statements made by Cadet Conover from the previous day. After Supervisor Squitieri refused to correct the situation and denied the allegations, Sergeant Browning called for Cadet Conover to join their conversation. Cadet Conover acknowledged that she only completed two (2) of the FDLE required four (4) FDLE test runs while completing the "Intersection Backing" course. Per Sergeant Browning, Supervisor Squitieri stated, "you did four out of five runs." Sergeant Browning alleged that Supervisor Squitieri then ordered all of the cadets to gather around the bleachers and addressed the class. It is alleged that Supervisor Squitieri provided direction to the cadets by stating, "don't let anybody tell you how many runs you did, you all did four out of five runs."

Supervisor Squitieri and Sergeant Browning then became involved in a verbal argument regarding Sergeant Browning's observations. This argument between Sergeant Browning and Supervisor Squitieri took place in front of multiple cadets, causing Corporal Gartenberg to intervene and separate the two. Sergeant Browning immediately responded to the PHSC administration office and reported his observations to Corporal Jennie Jones and PHSC Coordinator Brian Head.

A criminal investigation was initiated by the PSO Major Crimes Unit. All of the instructors and the 13 cadets were interviewed for the investigation. The Major Crimes investigation concluded by finding Supervisor Squitieri knowingly falsified two (2) CMS Vehicle Operations Performance Evaluation "FDLE forms for Cadet Shannon Conover and Cadet Kati Cage, while scoring the "Intersection Backing" course on 9/11/2018. The case findings by the PSO Major Crimes Unit were a direct violation of Florida State Statute 893.13 (Falsifying Records).

(Continued on reverse side)

Exhibit I

Pasco Sheriff's Office

OCA: 18037852

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Case Status: PENDING/ACTIVE

Case Mng Status: INACTIVE

Occurred: 09/11/2018

Offense: FALSIFYING RECORDS BY PUBLIC OFFICERS/EMPLOYEES

Investigator: MCGAVOCK, BRIAN (4226)

Date / Time: 10/04/2018 18:43:28, Thursday

Supervisor: QUINLAN, DEAN T (0704)

Supervisor Review Date / Time: 10/08/2018 16:19:27, Monday

Contact:

Reference: Case Review Conducted

STAT DATA: Change case status from Pending/Active to Inactive. Add witness: Kris Babino. Add witness: James Browning. Add involved other: Folson Etienne. Add involved other: Emin Garcia. Add involved other: Joaquin Gonzalez.

CASE STATUS: Inactive.

SAO INVESTIGATION DATE: N/A.

SUPPORT DOCUMENTS: None.

RELATED CASE(S): None.

INVESTIGATION:

On 10/4/18, a case review was conducted on this alleged Falsifying Official Documents investigation. Cadet Cage and Cadet Conover completed less than the required four (04) test runs for Intersection Backing, but were still marked by Squitieri as having successfully completed four (04) test runs. However, the presence of criminal intent by Squitieri to knowingly and willfully falsify the documents could not be established. Because of this, the case will be moved to an Inactive Status. If new information is obtained to either support or unfound the allegations, this case will be reopened for further investigation. No further action.

BRM

10/4/18

ICR: 1.0 Hours X \$26.00 = \$ 26.00

Exhibit J

Statement- PSO Disciplinary Hearing

Case: #2018-037

Allegation of General Order 26.1.II.C2

Respect toward superiors and subordinate members

October 19, 2018 Alleged Date of Incident

I would like to state on record that my employment title and status is still in the process of a Judicial Court hearing on February 28, 2019 with the Sixth Judicial Circuit Court in Pasco County pertaining to my Law Enforcement Officer Bill of Rights. I am present at this hearing to comply with Pasco Sheriff Office's guidelines pertaining to this disciplinary hearing. I am complying with this hearing without waiving my Law Enforcement Officer Bill of Rights or the continued violations. A copy of this statement and its attachments has been mailed to the Sheriff and is now public record.

The allegations made against me are false and there are inconsistencies in the investigation. Also, the statements made by both Manager Hite and Christopher Bennett are untruthful. I have an outstanding work history and a professional relationship with all Pasco Sheriff's Office members as well as direct contact with Sheriff Nocco and his Command Staff.

In the past three years, I have had no documented instances of formal discipline with the Pasco Sheriff's Office. Furthermore, over a 33 year career in Law Enforcement, I have had no documented instances of formal discipline so to be the subject of this false allegation, it is difficult to not push for justice and defend my character and record. I mean no disrespect to any of the members on this board or the Sheriff office and only wanted to seek a fair process.

I did not get full access to the case file and all recorded interview tapes and logs in a timely matter and I am still having a few issues with audio recording. This has altered my ability to properly prepare for this hearing. In addition, I am presently waiting on numerous public record requests pertaining to equitable discipline and documented finding of this board pertaining to discourtesy investigations. Attorney Lindsey Moore was spear heading these requests as well as the release of any of the information.

I have repeatedly said I did not make the alleged comments. My testimony was clear when I said I had continues communication with many members of this agency pertaining to the EOT approval process including Manager Pearn. The investigation provided a time line of events showing inconsistencies from Manager Hite.

As noted throughout this investigation, I spoke numerous times with Manager Pearn in regards to the process and updates that needed to be followed up on pertaining to his EOT eligibility with Human Resources Manager Hite. This was reinforced by manager Hite's repeated emails throughout the day that he was approved for the EOT class. I also stated in my testimony that my cell phones were not working properly and the phones were dropping calls and cutting out. I testified it was a very difficult and stressful time for all of us involved. I was working hand in hand with the hurricane deployment all while trying to make numerous calls to Manager Hite and Manager Pearn. Manager Pearn and I both testified we were in communication throughout the day with one another and I asked him to go see Manager Hite and asked him to conference call FDLE field specialist Scott Ballard as there was nothing else left for me to do on my end. This directive was earlier in the day on 10-19-2018.

I also informed Manager Hite to meet and deal directly with Pearn and FDLE Scott Ballard. Numerous emails and communications showed Manager Hite was advised in the steps to take to complete her task earlier in the day. I explained to her that Manager Pearn will come by and see her. This took place earlier in the day and not at 3:20 pm as she claims. She sent emails to Sergeant Irizarry earlier in the day stating that all the paperwork was fixed. She made this email statement after Command Staff members' questions Pearn's paperwork still not being approved. I do not dispute the three of us were in communications throughout the day. I will repeat again that I never made the alleged comments or any disrespectful comments to Manager Hite or any other member or person. I did not talk to anyone concerning this issue even after I felt Melissa Hite was not responding professionally in her endeavors.

This investigation started on October 19, 2018 and is still on-going. This is an extraordinary amount of time and energy for an alleged discourtesy complaint.

The complainant, Manager Hite and her witness Christopher Bennett have provided statements and a time line of events that have not been supported by a single co-worker within ear shot of this alleged incident. His testimony stated that he heard me say "stick that paperwork up her fucking twat". He said Manager Hite then walked to his office with her phone and walked into his office and closed the door. Once she was in the office, he heard me say "She's a fucking retard". This testimony directly contradicts Managers Hite's statement that she set her phone down on her desk and heard me say the alleged comments over the phone while she was in her office. She testified she took my call-waiting phone call in front of Christopher Bennett after she walked to his office. IA investigator Roy failed to pick up this very simple contradicting statement. Internal Affairs investigator never interviewed Christopher Bennett a second time to confirm this series of events which was a key piece of evidence and the validity of Christopher Bennett statement.

The testimony of Christopher Bennett is not consistent or supported by any witness. His proximity of the event and his ability to identify my voice through a slight accent is a false statement. I do not have an accent.

Human Resources Specialist Christopher Bennett testified "I know 100 % the voice I heard was Supervisor Squitieri because of his accent." It should be noted that Christopher Bennet has talked to me one time for approximately 5 minutes. I have never met him in person or had any other verbal communication with him since my employment. His statement of identifying my voice is not believable or the truth. The evidence that was presented through testimony is that other Human Resources employees heard Manager Hite using the fuck word.

Manager Hite's ability to allegedly hear me making derogatory and unprofessional comments over the open line is not true or possible. The background and activity of a hurricane disaster site with 70-80 deputies, tractor trailers, refrigerated and running compressor trucks, generators, workers and a wide range of other activity would make this impossible. I reviewed the Pasco County phone records and do not dispute it appeared to have an open line.

Manager Hite testified that I put her on hold or I thought I hung up. This statement is speculative on her part with no evidence to support such a claim. This includes the fact that there were no other witnesses beside Christopher Bennett and his statements are a false allegation that needed to be investigated.

There are simple logistical facts that Internal Affairs investigators needed to look into more clearly. Subsequently, measurement in the Human Resources office, as to the validity of space and distance, to hear such a conversation with no other witnesses. The fact that others heard Manger Hite use the fuck work but not me. The ground zero site where I was working and the activity around my immediate space while on the work site should not be ignored. Locations of my Pasco Sheriff phone in my pocket and its ability to pick up clear identifiable conversation during such a busy environment. The possibilities of any voice or any profanity being heard would be difficult at best. To clearly identify such an exact phrase would be impossible. The statements Manager Hite and Christopher Bennet are simple no true. I testified that I never said any or any form of the alleged statement.

[DEMONSTRATION OF ALLEGED PHONE CALL]

Witnesses from the Internal Affairs investigation provided two statements from Human Resources employees' working within the Human Resources office are a vital part of this investigation and should not be ignored. They explained they heard Manager Hite using the fuck word on numerous occasions during this incident. Christopher Bennett's statement, of he never hears this type of language, again is a false statement. Due to his proximity of the incident, he said he heard my statement. If he apparently could hear me, why couldn't he hear Manager Hite using the fuck word? This is inconstant and is a lie and a false statement. Christopher Bennett could not have heard one of use swearing but not the other. I believe he did not hear anything but Manager Hate's profanity.

The report of Human Resources employees hearing this incident lead to all of the Human Resources employees working that day to be interviewed. All witnesses in Human Resources were interviewed and never supported Christopher Bennett claim that "many people heard it". The Human Resources employee's interview only reported Manager Hite's use of the fuck word.

The allegation of General order 26.1.II.C2 –Insubordination Offenses: respect towards superior and subordinates members is false and unfounded. I never made the alleged comments to Manager Hite or any member of this agency.

I voluntarily took a polygraph examination that provided evidence supporting the alleged comments were never said. I did not have to take this exam but offered it anyway. Manger Hite and Christopher Bennett could have voluntarily taken the same exam if they truly wanted to show their truthfulness. Please see attached Exhibit A.

I believe this is fabricated story pushed by Manager Hite and Specialist Christopher Bennett to avoid exposure of their incompetence and Managers Hite's own General order violations of 26.1.II.C2 (using the fuck word) and her untruthfulness. The investigation revealed testimony of her repeated behavior and disparaging remarks, the fuck word, while in the presence of Human Resources employees. Internal Affairs was made aware of this information yet failed to investigate during their investigative actions.

This investigation had a summery that is vague and has only partial information. My transcribed statement is thirty three pages, yet Internal Affairs Investigator Roy summarized my statements in less than two pages.

Manager Pearn's statements are even longer and had the similar summarized shortcuts. I believe anyone that reviews this case should not be relying solo on a very condense summary of this investigation and they should listen to all the recorded audio tapes.

This investigation involved numerous Command Staff members yet none of them were called upon to testify. I believe Colonel Jeffrey Harrington was involved in this investigation on numerous occasions. Manager Pearn claims the Col. contacted him at the start of the investigation after Manager Pearn submitted his memo. Manager Pearn was told by Internal Affairs investigator Roy that Col. Jeffrey Harrington told them to come down a second time to see if he changed his story.

Manager Pearn was contacted five times but the case file only shows three transcribed transcripts. Five interviews were conducted with Manager Pearn to include numerous interviews at St. Petersburg College Allstate Center and the Manatee Community College campus.

This information should have been made available in this case file. Manager Pearn's testimony shows he felt he was being punished for not hearing a statement that was alleged to have been said during a phone conversation with Supervisor Squitieri. Manager Pearn's voiced concerns should have at least been addressed by Internal Affairs Investigator Roy.

On Saturday, October 20, 2018 Col. Jeffrey Harrington called Manager Pearn from his personal cell phone in attempt at what Manager Pearn thought was to get him to change his testimony following the written memo he had submitted Friday, October 19, 2018. This call would be the first of many attempts to intimidate him into changing his testimony about the events.

Over the next week Manager Pearn was interviewed three times where the investigator repeatedly tried to lead or alter Manager Pearn's statement. Each time Manager Pearn corrected them, stating time and again that he never heard me make those statements. At one point after being put on leave, while in an EOT class in Manatee County, the investigators showed up to inform him he was being investigated but would not say what it was for and never served him with any investigation paperwork. Again Pearn believed that this conduct was to intimidate him. Shortly thereafter, Pearn was served with paperwork terminating his employment with Pasco Sheriff's office for failure to meet the terms of his probation; even after having received a glowing review a few days prior to the start of this investigation.

Col. Harrington should not have reach out to Manager Pearn or been briefed of the day to day activity of this case. If Col. Jeffrey Harrington was in contact with Manager Pearn during this investigation, he should have been interviewed as a witness. His involvement should not have played a role in the investigation.

On the date the incident allegedly occurred, Sergeant Christina Irizarry and Chief George McDonald called me in a conference call asking about the status of Manager Pearn's EOT paperwork. I told them both that I believed that Manager Hite was provided with all of the paperwork and that she was confused and did not know how to do it.

Shortly after my phone conference with Sergeant Christina Irizarry and Chief George McDonald I was cc'd on an email from Manager Hite to Sergeant Christina Irizarry stating that the paperwork was taken care of and Manager Pearn was good to go for his EOT class on Monday.

Following the email to Sergeant Christina Irizarry I received multiple emails and missed calls from Manager Hite stating that it was not taken care of, Manager Pearn could not attend the EOT class on Monday and asking me to call her back ASAP.

Chief George McDonald, Captain Jared Hill, Director Sanfa Johnson and Sergeant Christina Irizarry all had first-hand knowledge of Manager Hite's mistakes and inability to complete this very simple task pertaining to Manager Anthony "Tony" Pearn's EOT status. This was revealed through my testimony and supported by emails. The emails are part of this case file. All witnesses should have been interviewed at the start of this incident since it stemmed from Manager Hite's inability to do her job and her false and inconsistent progress pertaining to Manager Pearn's EOT file.

Manager Hite was not forthcoming and honest in her emails which would question her character and ability to remember details and to be honest.

This violation and alleged discourteous comments were said to be made by me about Manager Hite over an open line or when the phone was on hold. I don't even know how to place a caller on hold nor would I have even attempted such a thing. The comments were alleged to be overheard by numerous employees working in HR. It was said by Christopher Bennet "He never hears this type of language in HR" so it got his attention. He said he never hears this type of profanity and it was disgusting. Manager Hite was so upset she had to take a break. Manager's Hite's use of the fuck word clearly shows Christopher Bennett's statement is not accurate.

Eleven witnesses were called in for questioning. This included Manager Hite and Christopher Bennett.

All nine of the Human Resources employees interviewed said they never heard any statement. Not only did they not hear any statements they quoted in their sworn testimony "I never heard any derogatory comments made or made about Manager Melissa Hite by SUPERVISOR SQUITERI."

Roxanne Sterneman testified she heard Melissa Hite using the Fuck word as she was yelling on the phone. Ashlynn Gray testified she heard Manager Melissa Hite using the Fuck word and that she appeared very agitated. Their testimony stated that they think the call was on a speaker.

The fuck word that was broadcasted by Manager Hite was apparently not heard by Christopher Bennett. His testimony said "I never hear this type of language in the office so I remembered it clearly". His statement of never hearing this type of language in the HR office is a false statement and should have been questioned by investigators.

Another employee who was recently fired, Monique Leverrete, was a witness to Manager Hite's behavior in the Human Resources office prior to this incident. She heard Manager Hite referring to me as an asshole and a fucking Moran. She should have been questioned as she was a 14 year veteran within the Pasco County Sheriff's Office. Her statements would have shed some light on this office. This was an employee with a respectful work ethic and history. Why wasn't she questioned after evidence was exposed of Managers Hite's work conduct?

The phone record showing an open Pasco County phone assigned to me is the bases of this finding of guilt. The Internal Affairs investigators speculate and lead the reviewer to believe that there is a 100% assumption of guilt.

Please note, witnesses testified Manager Hite and Christopher Bennett were observed going into Christopher Bennett's office and closing the door. In addition, they testified Manager Hite was heard yelling and screaming.

The timeline on this incident and its events do not add up across all sworn testimony and emails. Chief Henshilwood documented in an incident report Melissa Hite reported the incident to him at approximately 3:00 pm. He also filled out a disciplinary sheet on 12-5-2018 recommending a founded complaint against me as well as a dismissal. I feel this was early for a finding.

Manager Hite swears I told Manager Pearn to come by and see her and he showed up approximately 15-20 minutes after I spoke to her. This may be why she felt it was my voice she heard after the alleged conversation that took place with Manager Pearn and myself. Manager Hite's claim that there could be no other reason for Manager Pearn to come to her office is untruthful. Absolutely no evidence supported her claim that I told him to walk over at this time.

The Internal Affairs investigators reviewed a file pertaining to Manager Pearn which had a sticky note placed on it by Manager Hite stating Pearn dropped off the files on 10-19-2018 @ 1520 hours. She claims the incident of discourtesy took place between 3:13 and 3:20. This shows that manager Hite is clearly mistaken on the actual time frame. If her notes were accurate, Manager Pearn would have been in the office having this alleged conversation in front of Manager Hite. If her notes were not accurate, then her recollection of events weren't either.

Manager Hite speaks of her dialogue with Manager Pearn as pleasant and caring yet his testimony and the testimonies of her subordinates provided a slightly different view of her. She was rude and unprofessional throughout this process. His testimony provided an insight of an agitated Manager that was slamming doors and spoke rudely to him. On one occasion, she even slammed the door in his face. This behavior was acted out in front of her Human Resources employees. This is another example of her inconsistency and truthfulness in her testimony. The investigator avoided any questioning on Managers Hite's demeanor or follow-up regarding her unprofessional behavior. The testimony shows an extremely unprofessional Manager using the fuck word and aggressively posturing.

Testimony revealed she was using the fuck word that day and not me. This was reported by Human Resources testimony and is not my hunch or guess but it is sworn testimony on file.

The statement I allegedly made was never proven and was unfounded. Furthermore, the fuck word Manager Hite used was offensive and against conduct. Her past behavior of calling me an asshole and moron was heard by an employee prior to this incident which shows Manager Hite already had a demeanor of abuse when dealing with other employees.

If Sheriff Nocco was concerned with corruption, truthfulness, bias or discriminatory behavior, then this investigation would have covered all investigative leads with legitimacy.

Any finding less than unfounded is not a fair and impartial finding. Any discipline associated with this case outside the lines of past practice is a clear indication of an unfair and unequitable punishment towards me. This case is an example of unsupported speculation and an inapt IA investigation. This entire incident was not handled professionally.

Testimony has provided evidence that Manager Hite and Christopher Bennett statements are false and unfounded.

Furthermore, Roy provided false information to me when he stated that Larry Kraus never received a leave slip for me. The IA file states differently that Kraus did have a leave slip from me but claims he did not approve it- which is also a lie.

Roy further misrepresented facts surrounding my leave.

I was taking leave for personal reasons relating to FMLA but was going to use vacation leave as to keep it private. On 11/05/2018 Det. Roy contacted me and said he needed me to come into the office with an hour. I informed him I was on vacation leave. He stated that I did not have any leave "on the books." I informed him that my leave was with my supervisor. Det. Roy then called me back approx.. 15 mins later and stated that he spoke with Kraus and Kraus stated that he never got a leave slip from me. This was a blatant lie which will also be addressed. Det. Roy then stated that even if I did have leave that my leave was cancelled, and I was ordered to return to the office. I informed him that I would be on FMLA sick leave and not able to return. **Prior to Roy calling me back I emailed the HR director, Reed, and informed her that I was out on sick leave. Federal law states that FMLA leave can be taken intermittently and serve psychological stress and depression is a valid legal reason to use sick time and FMLA.** Not only did Reed not pass this information along, I was terminated during my FMLA leave. Roy continued to ask questions why I was on leave and I stated I was helping my mother. In the IA summary he presents this in a false manner and makes it appear as if I was lying.

In fact, I was helping my mother, **and** I was out on sick leave for FMLA reasons psychological stress caused by the constant mistreatment of the agency and witness tampering. Federal guidelines clearly state that psychological stress is a valid reason to use FMLA. Simply because I was on FMLA and attending the EOT is irrelevant. My doctor advised me to attend the class to get out town and away from the psychological stress of the situation and it was even better because it was out of town. So, Roy again misrepresented this in the summary, and I was never interviewed or asked one question pertaining to this issue. I originally put in for vacation as I did not want the agency to be aware of my psychological stress. After Roy claimed he was canceling leave and ordering me to the agency I was legally able to use FMLA. FMLA can serve dual purposes.

Additionally, Roy 100% made up the fact that they obtained contradictory evidence that proved I was provided false testimony in reference to bringing HR paperwork in reference to the EOT class. In my testimony I went into great detail explaining this was on my own accord. Additionally, tapes obtained by my lawyer from Squiterie's testimony also 100% mirror my statements. I never waived in this at all and was asked about it repeatedly. I also provided additional evidence that I spoke with the director of SPC on that Friday at approx./ 1500 hrs and he returned my call at approx.. 1600 hrs informing me that the college still did not show me approved for the EOT. It was at that time I went to HR. Roy 100% falsified this finding.

Additionally, the executive summary pertaining to the incident I addressed with Capt. Foshey is also 100% false. I have the email evidence which SHE emailed me!!!! I have attached it here for review.

It appears that Roy was asked to provide founded allegations against me no matter what the actual evidence supported. I strongly assert that this is 100% related to Major Peake and his desire to fire me for unearthing and addressing his unethical and unlawful violations pertaining to the proposed illegal targeting of citizens.

I am filing an official IA complaint against Jeffery Peake for unethical actives and abuse of power.

The week of Oct. 8th I was in charge of the ILP division while the director was out of town. I became aware of an incident involving a citizen who made a post on facebook about Deputy Carmack. The citizen (whose information I have) posted a mug shot picture of the deputy on her facebook. I received a call from Major Peake asking me questions about the incident. He asked if she did anything illegal that she could be arrested for. I stated that the pic was accessed via the Pinellas County site and she had not committed any law violations. He then asked that I obtain any and all information pertaining to her and all of her family. Peake went on to state that, "we cannot let someone say bad shit about the sheriff's office, we need to lock her up." I stated that what she posted was actually true since the deputy was arrested but he was clearly not happy.

Throughout the day he contacted me via cell at least five times asking for updates and if we had anything to arrest her on. He requested that I notify SIU detectives and have them begin conducting surveillance on her and her family and arrest them all. I have always prided myself on having the moral courage to stand up for what is right and I informed Peake that I was not comfortable with this activity and targeting citizens for posting derogatorily and true statements seemed like a misuse of power and unethical. He informed me that he would just deal with the SIU Sgt. Direct "because it would be easier."

Approx. one week later I had an in-person conversation with Col. Jeff Harrington and I informed him of all the details of this incident and stated I was not comfortable having the Intelligence division being used as an unethical tool to abuse the Sheriff's power. He acted upset about the incident and "said he would look into it." He then went on to say that maybe I would be happier working in a different division at the agency or maybe the agency was not a good fit for me.

It is clear I was harassed and targeted for addressing and unearthing gross abuse of power by the agency. Peake has set a pattern of abuse of power and misuse of the intelligence division to intentionally harass and target citizens who simply make true statements about the agency.

I firmly assert that I was intentionally targeted to smear my name to offset the potential of whistle blower allegations. I have extensively documented this incident and my attorney has made contact with the individual who was the focus of this harassment. I am 100% certain that this incident was never documented and never investigated by the PCSO

The agency is in direct violation of federal Whistle Blower Protection following this incident. I was unfairly treated, harassed, and had my statements falsely misrepresented in order to cover up the wrongdoing of the Major.

Exhibit K



ILP Manual

Pasco Sheriff's Office

Revised 1/7/2016

Foreword

“Improvise, Adapt, and Overcome” is a mantra engrained in organizations that constantly address complex situations and then develop solutions to be successful. Since the Pasco Sheriff’s Office implemented Intelligence Led Policing (ILP) in 2011, we have continuously been in the process of improvising, adapting, and overcoming to consistently create positive results in our operations.

Early on, we learned that processes in ILP must continuously adapt as the nature of crime and the threats to our community change rapidly. What may have worked yesterday, may not work as well today, and will be ineffective tomorrow. We know that we must consistently look and create best practices to address issues, design guidelines that will allow for innovative and creative solutions, and utilize intelligence and information to help us make the best decisions.

An element of success is innovation. It is the ability of our members and citizens to be able to develop strategies to address emerging issues, formulate a plan, and quickly implement it. Speed is critical to success and bureaucratic processes that delay implementation must be overcome. To allow innovation to flourish, we must be brilliant at the basics and in our operations. There should be standard procedures in place to address the issues we routinely face. Once we instinctively handle common issues, we can flourish in innovation on how to proactively address future concerns before they arise.

Communications between our members and citizens is also a key component to success. Through crime prevention measures or just simple open dialogue of crime in the community, we can work together to find solutions. If we do not provide our citizens information, they will receive it another way that may not be factually accurate. Communication through technology is rapid and our law enforcement agency should be the first to inform the public of emerging issues, how to protect themselves, and how we are serving them. If we do not communicate the message to our citizens, someone else will.

One of the most important elements to success is our members understanding and believing in the mission along with valuing their input. Every member of this agency should be able to answer the question: Why? Why do we operate the way we do? Why do we follow the doctrines of intelligence-led policing? Why am I important to the process? When a member of this organization can answer the “why” they will then proceed with: How can I make us better? Our philosophy is not just a “saying”, it is our business model. It is imperative that supervisors understand our model and continuously teach it and allow feedback on how we can improve it.

The process of intelligence-led policing will continue to change as threats emerge, technology advances, and innovation leads to new processes to address issues. We will continue to improve and this living document will continue to transform. When we see a new crime trend developing, a bureaucratic issues getting in the way of progress, or a quality of life issue affecting our citizens, we will find a way to improvise, adapt, and overcome. This is the foundation of continuous process improvement and of how our organization should operate.

Chris Nocco, Sheriff
Pasco Sheriff’s Office
We Fight As One

Section One: An Overview of Intelligence-Led Policing (ILP)

There are many approaches to law enforcement that have been implemented in various agencies throughout the country. Each law enforcement executive had a reason why he or she chose a particular philosophy. Whether in response to a specific need or to help receive available grant money, each philosophy has its own strengths and weaknesses. One of the benefits of Intelligence-led Policing is that it embraces the best aspects of other philosophies into one business model.

In his book bearing the same name, Dr. Jerry Ratcliffe, one of the foremost authorities on the topic, defines Intelligence-led Policing or ILP as “a business model and managerial philosophy where data analysis and crime intelligence are pivotal to an objective, decision-making framework that facilitates crime and problem reduction, disruption and prevention through both strategic management and effective enforcement strategies that target prolific and serious offenders.” (Ratcliffe, 2008)

While ILP represented a paradigm shift in the focus or approach to law enforcement, it is not a complete departure from existing successful practices, as mentioned. Rather, it is a new approach to policing that utilizes the most effective aspects of existing policing models such as the traditional policing model, community oriented policing and problem oriented policing to achieve goals of crime reduction. To gain a better understanding of ILP and how it differs from other established models, Table 1.1 illustrates five well known policing models and their unique characteristics. ILP embraces a “top down” management approach to determine priorities through extensive use of intelligence analysis with additional prioritization on prolific offenders and problem areas. The model depends on analyzing information gathered from a multitude of sources at every level of the agency to create useful and actionable intelligence. ILP embraces a “top down” management approach to determine priorities through extensive use of intelligence analysis with additional prioritization on prolific offenders and problem areas. The model depends on analyzing information gathered from a multitude of sources at every level of the agency to create useful and actionable intelligence.

Table 1.1 (Ratcliffe, 2008)

Supervisory Expectations:

The intelligence-led policing philosophy in place in our agency has a proven track record of success. Like any successful initiative, ILP will remain successful only if it remains flexible and adaptable to change and is supported by leaders within the organization. Though by design ILP is

a top-down management philosophy, the most important leaders in this process are our sergeants and lieutenants.

Section Two: Core Components of ILP

Prolific Offender Identification

A small minority of offenders commit significant amounts of crime. Identifying and targeting these “prolific” offenders is a central strategy in ILP and may be the best way to use our scarce police resources. Some studies show 6% of the criminals commit 60% of the crime and others point to 20% of the criminals committing 80% of the crime. Regardless, with limited resources, it is incumbent on us to focus our efforts on those criminals who we have reason to believe are frequent or prolific offenders.

As new information is learned, it is important to share this information with investigators and the analysts in the ILP Section.

While a standardized definition of a “Prolific Offender” helps align our agency’s strategy, it is important to recognize that crime and criminals are ever-changing and no definition written can capture every type of situation. Criminal events such a violent crime spree or serial rapist for example may necessitate temporary realignment of focus.

Pasco Sheriff’s Office Definition of a Prolific Offender:

A person of any age who meets or exceeds a threshold calculated by weighting their three year history in Pasco County, Florida of arrests and suspicions for burglary, theft, narcotics violation, robbery, and/or any other forcible felony. A prolific offender must have been arrested at least once.

Offenders in Pasco will be considered to be “prolific” based on the frequency and types of offenses they have committed or are suspected of having committed. These offense types include burglaries, thefts, narcotics violations, and forcible felonies. The time since their most recent offense, and the age of the offender are also factored into the definition.

Limitations:

To maintain a reasonable focus, other crimes such as negligent abuse and fraud are not used to identify prolific offenders. Some prolific offenders will have only burglary offenses, while others will have mainly robberies or narcotics.

Offenders:

Offenders often follow trajectories of activity and eventually “age out” due to maturity or personal circumstances. To account for this, age and time since the most recent offense are factors which diminish the potential for an individual to reoffend.

Source data:

The definition of a prolific offender will be based solely on information in the Records Management

System (RMS). While offenders may have committed offenses in other jurisdictions, or for which they were not suspected, using RMS data will allow for a quarterly snapshot of verifiable crime. Robberies, burglaries, auto burglaries, and motor vehicle thefts make up the "Big-4" in Pasco. To this definition, all other thefts, narcotics violations, and all other forcible felonies have been added.

Offenses:

Being arrested or being entered as a suspect both contribute to the definition of a prolific offender. A prolific offender must, by definition, have been arrested at least once. This requirement is to avoid unjustified identifications such as an irate neighbor causing an individual to be the suspect in numerous cases which never lead to an arrest.

Predictability:

Identification as a prolific offender does not guarantee that the individual will reoffend. The relationship is merely a correlation between past and present behavior which may or may not predict future behavior.

Timeframe:

In studies of the PSO RMS offense information, three or four years of historical data allowed for the best predictor of future offending. The accuracy was highest for predictions extending out for six or nine months. Three years of history are used in the PSO definition.

Selection:

To be selected as a potential prolific offender, the individual must meet at least one of the following criteria:

1. Arrested for at least one forcible felony (due to the potential or inherent violence),
2. Arrested for at least three burglaries, thefts or narcotics violations,
3. Arrested for at least two burglaries, thefts or narcotics violations with at least two additional suspicions, or Offenders are qualified for selection using a minimum set of criteria and then scored and ranked to identify which are prolific offenders.
4. Arrested for at least one burglary, theft or narcotics violation with at least four additional suspicions.

Once selected, individuals are scored and ranked by the number and severity of offenses committed, age, and inactivity since the most recent offense.

Prolific Offender Scoring:

The scoring is based on the same types of offenses as is the selection process, but multiple arrests on the same day are compressed into a single arrest. The scoring is totaled as follows:

1. 4 points for each forcible felony arrest,
2. 2 points for each forcible felony suspicion,
3. 2 points for each burglary, theft, or narcotics violation arrest, and

4. 1 point for each burglary, theft or narcotics violation suspicion.

This total score is then reduced for both aging offenders and those who have not offended recently.

The score is reduced by one percent for each year the offender has aged over twenty. The score is further reduced by ten percent for each year since their most recent arrest. Individuals with at least nine points under these conditions are identified as Prolific Offenders according to the PSO definition.

Examples of Prolific Offender Calculations:

The following four examples show how prolific offenders are identified (the names have been changed):

1. Ari Haswari (11/17/1983) during the past four years was arrested for 19 offenses from the burglaries, thefts, and narcotics violations category (most recently a year ago). His 38 points are reduced by ten percent for the one year of inactivity and by 12% due to his age of 32. His modified score is 30.4, well over the 9.00 needed to identify him as a prolific offender.

2. René Benoit (03/06/1996) was arrested for one forcible felony and eight other considered offenses. His most recent arrest was two and a half years ago and he is under twenty years old. His unmodified score is four points for the robbery and sixteen points for the other offenses for a total of twenty points. This score is reduced by 25% because of his two and a half years of inactivity. His age is under twenty, so there is no age modifier. His modified score is 15.0 (over 9.00) so his is also identified as a prolific offender.

3. Nikki Crawshaw (11/11/1988) had one forcible felony arrest and three other arrests for an unmodified score of 10. Her most recent arrest was the prior month and her score is reduced by six percent due to her age of 26. The resulting modified score is 9.4, so she is identified as a prolific offender.

4. Tiffany Chase (12/27/1974) had six burglary, theft and robbery arrests for an unmodified score of 12. However, due to a year and a half of inactivity and age, her modified score is 7.9. She is not identified as a prolific offender.

If an individual is NOT considered a Prolific Offender by ILP:

If an individual has not been identified as a Prolific Offender by ILP because of a limitation in criminal history, RMS data, or any other indicator, the following Prolific Offender definition may apply:

A person of any age with 7 or more verifiable instances of criminal activity related to residential burglary, auto burglary, grand theft auto and forcible felonies within a three year period.

Performance Expectations:

- Learn as much as possible about prolific offenders in their assigned area to include their acquaintances, vehicles, locations frequented, previous M.O. for offenses, documenting accordingly, vehicles owned, etc.
- Maintain knowledge and situational awareness of probationers in the area.
- Develop and maintain rapport with investigative units.
- Provide timely documentation of contact with offenders via reports, tips, etc.
- Strive to identify those people who may be prolific offenders and are not already identified through other means. Draw from calls for service, investigations, information obtained from citizens or informants, reading morning reports and other products disseminated by ILP, and participating in actionable intelligence meetings to identify offenders who you commonly deal with and who are responsible for crime trends within your assigned area and communicate these individuals to ILP.

Supervisory Expectations:

- Ensure and reinforce subordinate's knowledge of prolific offenders within area of responsibility through roll call briefings, small group intelligence sharing, etc.
- Manage the process of prolific offender monitoring through effective strategies that do not create unnecessary redundancy. Example: While all deputies within an assigned area should have situational awareness of the prolific offenders in their area, only one deputy per platoon should be specifically responsible to monitor a specific offender. Otherwise, a deputy could knock on the offender's door at 8 am and another deputy could stop by at 9 am. This is not the most effective use of time and it is the supervisor's responsibility to prevent it from happening. By ensuring that all contacts are properly memorialized, this can be prevented.

Management of Crime and Disorder Hotspots

The research overall strongly supports the position that hot spots policing can have a meaningful effect on crime without simply displacing crime-control benefits to areas nearby. In Pasco County, areas we have designated as part of the Strategic Targeted Area Response (STAR) are locations where crime is persistently dense over an extended period of time. Generally, each STAR area accounts for 20-25% of the total amount of auto burglaries, burglaries, auto thefts and robberies for that district.

Performance Expectations:

- Learn the location of the STAR for your assigned district.
- Strive to gain understanding of the STAR with a focus on whether the problem is due to the location, offender, or victim and the opportunity being seized by the offender.
- Develop knowledge of offenders living or frequenting the area.
- Develop and maintain rapport with deputies assigned to the STAR.
 - Use Crimereports.com, One Solution and other available resources to remain abreast of existing and emerging crime trends in your area. If you continuously respond to the same location, try to identify the underlying cause of the problem and what options are available to adequately address the issue to prevent future calls. Think outside of the box and not every solution needs to be a law enforcement solution. There may be other

services or agencies throughout the county that may be able to assist with addressing the issue. Law Enforcement may just need to be the impetus to bring about a solution to the problem.

SARA Problem Solving

An effective means to assess known problems and problem areas is the use of the SARA model, which stands for scanning, analysis, response and assessment. This is a valuable tool to use when assigned to address a specific issue or problem in the community. To have an impact on crime, it is necessary to *reduce, prevent* or *disrupt* criminal activity. The most effective approach to law enforcement is an integrated strategy that combines some of the benefits of problem-oriented policing with the targeted and objective approach of proactive policing and Intelligence-Led Policing.

Scanning is where the problems are identified. This involves looking at data, talking to people, and observing the community in order to identify, define, consolidate and prioritize the problem.

Analysis involves studying the problem to determine if it deserves concerted attention and, if so, trying to develop accurate descriptions and explanations. The analysis step is the heart of the SARA Model. Human nature is to go from the identification of a problem to a response to the problem without knowing everything there is to know about the problem and with even less analysis of this information.

Response involves searching for a wide range of solutions and choosing and implementing the ones with the most promise.

Assessment involves collecting data after the response to determine if the problem has been eliminated or at least reduced. If success has not been achieved, then further analysis and a different set of responses may be needed. This stage is often forgotten or people get so committed to the solution they designed that they are reluctant to go back to the drawing board.

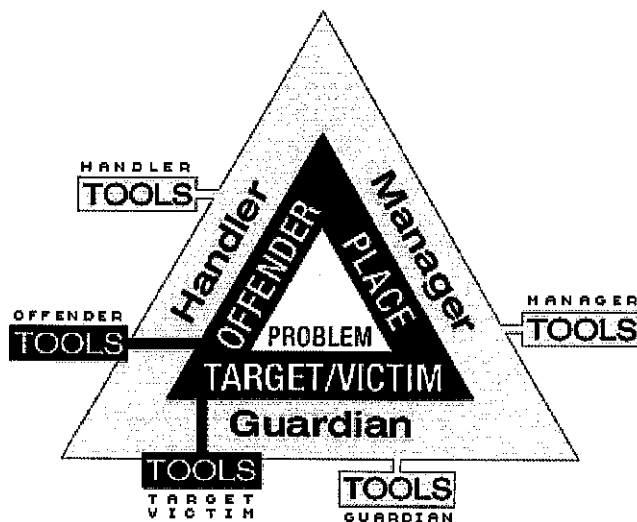


Figure 1:
Problem-Solving Triangle www.popcenter.org

If it is a “place” problem, try to identify what about the place is attracting crime. Try to determine what location and conditions are present at the time of each crime and what threads may connect the incidents? Once these causal factors are determined implement preventative measures that will reduce the potential for crime by adding appropriate “controls” that increase the risk of detection and apprehension. . For example, if there are numerous foreclosed houses in the area in disrepair, work with Code Enforcement to address. Determine if the crimes are occurring along frequently traveled routes that criminal may use and determine if there are opportunities to alter or impact these paths.

If it is a “victim” problem, consider marketing campaigns directed at the residents/businesses outlining what they can do to mitigate their potential for victimization. Examples include flyers, electronic signage, community meetings, newsletters, etc. If a number of cars were burglarized, all of which were unlocked, or illegally parked on a street, consider an educational campaign throughout the community using crime prevention materials, social media, and citizen contacts. Be sure to have a coordinated effort that is approved by your District Commander to guard against duplication of efforts.

Performance Expectations:

- Focus on each individual step in the SARA process separately.
- Determine the impact of the problem on society.
- Break down the problem into smaller questions as part of the analysis process such as: “Why is it happening here and not somewhere else?” “How long has it been happening and why did it start?” “Will the problem recur or return once law enforcement leaves?” Will you eliminate, reduce, displace, prevent, or do something else with the problem?
- Be sure to consider all options. Even options that are not plausible as a whole may have aspects that are worth considering.

- Focus on the outcome achieved during your assessment. Do not focus merely on outputs or how much work was put into the problem.

Supervisory Expectations:

- Maintain an excellent working knowledge of the STAR within your area that goes beyond the geographic boundaries of the STAR.
- Know which crimes are causing the hotspot to occur within the STAR.
- Know time of day, day of week (TODDOW) and MO patterns that are existing within the STAR and coordinate with the STAR supervisors to address those issues specifically.

Application of Preventative Measures

Crime prevention is the key to long-term crime control but greater crime prevention can also improve our ability to bring serious and prolific offenders to justice. Prevention is vitally important to any Intelligence-Led Policing agency. Recognizing patterns and working to disrupt those patterns through public awareness efforts can occur in many forms. From increased tactical patrol of high crime areas to community meetings to elaborate community events to social media postings, all members should innovatively and collaboratively focus on preventing future crime from occurring.

Traditionally law enforcement executives (decision makers) have not maintained a great deal of enthusiasm for crime prevention. The majority of law enforcement management policies tend to stress a bias for enforcement action [solely] as a first step in controlling criminal activity and little attention is given to instituting mechanisms that would promote crime prevention or reduction. The Pasco Sheriff's Office embarked on a paradigm shift by utilizing the Intelligence-Led Policing model to achieve a holistic and layered approach to crime control, prevention, and reduction. Ratcliffe cites crime prevention as the key to achieving meaningful long-term crime reduction and when institutionalized, crime prevention can also be a catalyst for improving an agency's ability to bring serious and prolific offenders to justice. Prevention is a vitally important, yet often overlooked, component of the Intelligence-Led Policing management model that must be implemented by any agency desiring to achieve meaningful crime control.

The overwhelming majority of crime occurring in the United States is that of opportunity based offenses in which crime prevention can play a role in reduction and displacement. Recognizing crime patterns and working to disrupt those patterns is a key to crime reduction. Likewise, identifying attractive targets (present or future crime victims) and instituting mechanisms intended to improve the environments capacity to displace opportunistic offenders can also lead to a reduction. The success of these prevention measures may be realized through a variety of means. This may involve the training and education of law enforcement personnel in modern crime prevention techniques and principles such as Crime Prevention Through Environmental Design (CPTED) that address crime control in both the social and built environments. Public awareness efforts can also be helpful and may occur in many forms. This may include the use of business and community meetings, webinars, social media, and community based training initiatives. Other forms may entail increased tactical patrol of high crime areas with a layered approach to crime control that encompasses enforcement, education, and empowerment (prevention). How does this all fit together? While crime prevention is a stated aim of

intelligence led policing, the focus on prolific offenders reduces crime if the correct “four of five offenders that find themselves incarcerated are responsible for a significant portion of the 1,000 crimes committed”. Prevention further benefits by disrupting the activities of prolific offenders. (Ratcliffe).

Performance Expectations:

- Examine trends in your respective area of assignment and try to determine what opportunity the criminal is exploiting and plan prevention efforts accordingly. Crime patterns will relate to an “offender, place, or victim” problem.
- If it is an offender problem and there are no commonalities among the victims, pursue opportunities to strategically patrol the area during opportune times, visit prolific offenders in area, etc.
- If it is a place problem, try to identify what about the place is attracting crime and take appropriate measures. For example, if there are numerous foreclosed houses in the area in disrepair, work with Code Enforcement to address. Determine if the crimes are occurring along frequently traveled routes that criminal may use and determine if there are opportunities to alter or impact these paths.
- If it is a victim problem, consider marketing campaigns directed at the residents/businesses outlining what they can do to mitigate their potential for victimization. Examples include flyers, electronic signage, community meetings, newsletters, etc.
- Be sure to have a coordinated effort that is approved by your District Commander to guard against duplication of efforts.

Supervisory Expectations:

- Look for opportunities to be proactive and lead. This is a tremendous opportunity for supervisors to provide lasting problem solving options beyond merely arresting people. Supervisors should recognize this is historically an area where deputies have limited experience and expertise. The results may not be immediately apparent or even effective.
- It is incumbent on supervisors to look at a problem holistically and not limit the focus solely on enforcement. Recognize as a problem solver it is possible to make many arrests and be unsuccessful and it is possible to make no arrests and be entirely successful. The goal is to reduce crime and fear.
- Seek to determine the root cause of each issue and how to prevent it from recurring.
- Remain resourceful and make evidence-based decisions after referring to successful options as found in popcenter.org or other internal agency initiatives.
- Track the successes or failures of each initiative for which you are responsible through statistical comparative analysis. The ILP Section can be of tremendous value in this area.

Effective Communication

Inter-agency and intra-agency communication is a crucial component of the Pasco Sheriff’s Office ILP Model. The elimination of “information silos” is an important first step and is in lock step with the *Intelligence Reform and Terrorism Prevention Act of 2004* (National Counter Terrorism Center, 2004) and the National Criminal Intelligence Sharing Plan (US Department of

Justice, 2003). “Information silo” is a term used throughout many business and governmental settings that refers to management systems incapable of reciprocal operation with other, related information systems.

Moreover, it is an attitude found in some organizations that occurs when several departments or groups do not want to share information or knowledge with other individuals in the same company.

Information silos are counter-productive to ILP and in stark contrast to our operational approach of “We fight as one.” Therefore, it is incumbent on every member to make a concerted effort to share information regularly with members of other units as part of a formal and informal process.

Example #1: Property crimes detectives should seek and share narcotics information with Narcotics detectives and vice versa. Patrol deputies should seek additional information from contacts on unrelated crimes. Example #2: After completing an investigation on a loud music call, deputies should use the opportunity to ask the complainant about crimes occurring in that area.

While sharing information is important, there are certain types of information that are sensitive and should remain confidential for officer safety and to protect the integrity of an investigation.

Performance Expectations:

- On every call for service, investigate and document thoroughly. Once complete, prior to leaving ask the persons interviewed if they have information about any other crime they may want to share about offenders or offenses occurring in the area. (Use judgment when pursuing this opportunity. Victims/witnesses of many crimes may be too emotional to offer information or may feel you are being dismissive of their original complaint.)
- While transporting arrestees to jail, develop a rapport with the arrestee. If he or she has invoked Miranda, do not ask any questions about their crime whatsoever. However, you may ask them if they know of other crimes committed by other people. Document accordingly. Small pieces of information gathered this way has proven to be helpful toward solving crimes.
- Maintain situational awareness of your assigned area. Know the offenders, crime prone places and trends. As you gain information share it on a wide platform with your district and with ILP Analysts. While sharing with one detective is a good start, look for opportunities to share on a broader scale.

Supervisory Expectations:

- Time is not on your side! Once a crime of great significance or a trend, pattern or spree has been identified, supervisors are responsible for ensuring the proper stakeholders have the pertinent and necessary information to act accordingly. The swift, intentional notification of oncoming shifts, opposite sides of the schedule, neighboring agencies are crucial to effective communication.
- Sharing the results of successful (or unsuccessful) initiatives can lead to dramatically enhanced efficiency within the agency.
- Supervisors must maintain and must ensure deputies maintain effective situational awareness of crime trends and offenders within their area of responsibility.



Section Three: The Intelligence Cycle

The intelligence cycle is the process of developing unrefined data into polished intelligence for the use of command staff. While there are many versions of the intelligence cycle, the cycle articulated by the FBI best matches the philosophy and model of the Pasco Sheriff's Office. The

intelligence cycle consists of the six steps, described below. The above graph shows the circular nature of this process, although movement between the steps is fluid. Intelligence uncovered at one step may require going back to an earlier step before moving forward.

Requirements

Requirements are identified information needs—what we must know to apprehend criminals, disrupt criminal patterns and prevent crime. Intelligence collection requirements are derived from many sources such as a detective requesting more information from a neighborhood experiencing daytime burglaries or a deputy requesting FIRs on any person riding a blue bicycle in a certain location on a certain day of week.

Performance Expectations:

- Relative to the “Offender, Place, Victim” try to determine what is causing problems and what we do not know that we need to know. Go beyond just “Who is doing the crime.”

Supervisory Expectations:

- Supervisors must lead this process.
- Determine what you don’t know that you need to know work closely with the ILP Section to observe year over year, month over month trends and patterns.
- Through enhanced communications, ensure that a duplication of efforts do not occur such as two platoons working on obtaining the same information.

Planning and Direction

Planning and Direction is management of the entire effort, from identifying the need for information to delivering an intelligence product to a consumer. This step also is responsive to the end of the cycle because current and finished intelligence, which supports decision-making, generates new requirements. In the Pasco Sheriff’s Office ILP environment, planning and direction is the responsibility of command staff acting on the needs of the county, crime trends and data provided by the ILP Section.

Supervisory Expectations:

- Though a top-down approach, supervisors below the command staff ranks must still plan accordingly.
- Supervisors should regularly provide command staff with ideas to address emerging and existing threats.
- Supervisors must remain abreast and knowledgeable of successful former initiatives and response plans for a variety of crime situations to help operationalize current command staff initiatives.

Collection

Collection is the gathering of raw information based on requirements. Activities such as interviews, technical and physical surveillances, tip submissions, FIRs, and developing positive work relationships with community groups are examples of collection of intelligence.

Performance Expectations:

- Review the collection requirements and develop a strategy and tactics to gather and submit the information.
- Gathering information goes beyond generating large volumes of tip submissions and FIRs. One high quality tip or FIR is more valuable than hundreds of tips of limited value.
- Focus on developing rapport with citizens in crime prone areas.
- Solicit information from inmates during booking and classification processes.
- Solicit information from Pasco County residents who call into the jail by asking if they are aware of any illegal activities going on in their neighborhoods.
- Document and photograph scars, marks, and tattoos into RMS for use in investigative purposes.
- Document as much information as possible into RMS during arrest and booking while assuring a master name record that is unique without any duplication.
- Use ILO and IPS to regularly solicit information.
- Awareness of detention deputies to listen for discussions between inmates that may spur additional conversations and information.

Supervisory Expectations:

- Supervisors need to play a leading role in the collection process by placing a great emphasis on quality of information gathered.
- Develop a strategy for deputies to access and develop rapport with community members in the areas they serve.
- Ensure deputies are always seeking new sources of information to support the intelligence cycle.

Processing and Exploitation

Processing and Exploitation involves converting the vast amount of information collected into a form usable by analysts. Processing includes the entering of raw data into databases where it can be exploited for use in the analysis process.

Analysis and Production

Analysis and Production is the conversion of raw information into intelligence. It includes integrating, evaluating, and analyzing available data for the production of intelligence products. The information's reliability, validity, and relevance is evaluated and weighed. The information is logically integrated, put in context, and used to produce intelligence. This includes both "raw" and finished intelligence. Raw intelligence is often referred to as "the dots"--individual pieces of

information disseminated individually. Finished intelligence reports "connect the dots" by putting information in context and drawing conclusions about its implications.

Dissemination

Dissemination is the last step and involves the distribution of raw or finished intelligence to the consumers. It takes the form of intelligence bulletins, BOLOs, situational awareness bulletins, etc. This also includes presentations to the command staff. The command staff makes decisions—operational, strategic, and policy—based on the information. These decisions may lead to more intelligence requirements, thus continuing the intelligence cycle.

Legal Considerations: 28 CFR 23

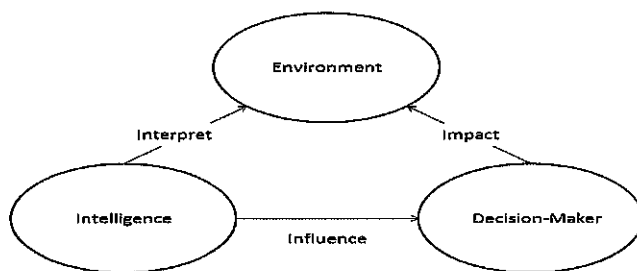
Collecting quality information is a key component of ILP. However, it must be collected and maintained in strict compliance of federal law as outlined in 28 CFR 23:

- All projects shall adopt procedures to assure that all information which is retained by a project has relevancy and importance.
- Such procedures shall provide for the periodic review of information and the destruction of any information which is misleading, obsolete or otherwise unreliable.
- Information retained in the system must be reviewed and validated for continuing compliance with system submission criteria before the expiration of its retention period, which in no event shall be longer than five (5) years.
- (a) A project shall collect and maintain criminal intelligence information concerning an individual only if there is reasonable suspicion that the individual is involved in criminal conduct or activity and the information is relevant to that criminal conduct or activity.
- (b) A project shall not collect or maintain criminal intelligence information about the political, religious or social views, associations, or activities of any individual or any group, association, corporation, business, partnership, or other organization unless such information directly relates to criminal conduct or activity and there is reasonable suspicion that the subject of the information is or may be involved in criminal conduct or activity.

Supervisory Expectations:

- Supervisors must ensure deputies are compliant with 28 CFR 23 by governing their actions and focusing only on those people and activities for which there is criminal predicate.

Section Four: Roles and Functions of Key Players in Intelligence-Led Policing



For the purposes of this manual, the operational aspects of ILP will focus on three distinct groups: 1) command staff directing the priorities; 2) intelligence analysts interpreting data to influence decision makers, and 3) deputies, detectives and line supervisors actively carrying out priorities and gathering information and intelligence.

(Ratcliffe, 2008)

Command Staff

The Pasco Sheriff's Office utilizes a "top down" approach to ILP as previously articulated. However, this should not be implied to mean that input, ideas and strategies at every level of the agency are not welcomed and encouraged. "Top down" in this context simply means that command staff members are actively receiving relevant, analyzed data from analysts and other members throughout the agency to help develop a thorough understanding of the criminal environment, and existing or emerging trends as a means of allocating resources and determining priorities.

Criminal Intelligence Analysts

Understanding the "where, when, why and who" of crime is a fundamental step before deciding what to do to reduce it. Criminal intelligence analysts are tasked with gathering, analyzing, and interpreting this data from a wide array of internal and external sources to create tactical, strategic and operational intelligence products that meet both current and long term planning needs. Each district is assigned at least one criminal intelligence analyst and members are

encouraged to communicate, share pertinent information and develop a dialogue directly with them to gain and provide situational awareness for an area or existing problem.

Deputies, Detectives and Line Supervisors

There can be no ILP success without the full understanding and support of the mission by front line deputies and detectives and informed first line supervisors leading their efforts. Gathering data such as quality FIRs and tips in response to collection requests is a crucial role in helping us understand the criminal environment and solve crimes. Deputies can also engage the process by maintaining situational awareness about their respective area of assignment and learning the prolific offenders in that area.

Section Five: Intelligence-Led Policing Practices and Tactics

Active Crime Enforcement (ACE)

ACE squads are a multi-disciplinary group of detectives responsible for aiding the agency in reducing UCR reportable crime; increasing the number of arrests of prolific offenders; increasing the number of clearances of Part 1 crimes; reviewing crime data provided by ILP and administering prevention measures to reduce specific crimes; and enhancing the communication of intelligence amongst all areas of the agency, notably within the Law Enforcement Bureau and the ICIB.

ACE will accomplish these tasks collaboratively with District Captains, STAR units, members of all investigative units and patrol deputies. The mission(s) may include a uniformed or plain clothes response to just occurred reported crimes and when necessary will assume a primary role in latent investigations. Additionally, they will be called upon to co-investigate crimes against property and crimes of violence when a prominent drug nexus is evident.

ACE is maintained within the Special Investigations Division and each ACE Team is assigned specifically to assist a district and supports District Objectives, STAR , Property Crimes and CID. ACE. is the focal clearing house of intelligence and one member on each A.C.E. Team will have intelligence duties assigned.

The effort to collaborate on latent investigations and support other agency members is at the heart of this initiative. While overall global responsibility of ACE remains with the Special Investigations Division Captain, the District Captains shall determine the day to day operational activities of ACE. The District Captains define and develop the district's desired outcomes through scanning their respective district for significant crime-reduction opportunities that can best be impacted by and is consistent with s ACE's stated mission.

In collaboration with each platoon and ACE, District Captains are responsible for requesting additional resources when ACE Teams are unable to unilaterally complete and/or sustain desired outcomes. Priority is generally given to desired outcomes that are offender-focused.

Once each desired outcome is met, summary meetings with Patrol/ Special Investigations Division Captain are held to discuss recommendations to sustain efforts and/or to prevent the recurrences.

ACE Teams assist VICE Detectives with tactical operations when additional manpower is needed, however the inherent mission of ACE is to complement but not replace VICE functions

Specific ACE Duties and Responsibilities:

- Reduce UCR Reported Crimes, with specific focus on Part 1 crimes (Big 4)
- Increase Arrests of Violent and Prolific Offenders
- Increase Intelligence Communication
- Active Crime Enforcement (ACE) Objectives
- Mission-oriented tips that cannot be worked by Patrol and/or linked to a District Outcome (not drug related tips unrelated to UCR crimes)

ACE Teams facilitate Intelligence Gathering/Sharing through a variety of means to include:

- Weekly AIM meetings, Read-Off attendance, and continual dialogue with ILP
- Weekly sharing of informal and documented information for intelligence vetting by ILP and awareness to all members in the District. One member of each ACE team will also pass along any relevant information to STAR/District when ending each work week.

ACE Teams support Patrol/CID Investigations (Part 1) through tactical and strategic operations to include:

- Rapid Identification and Apprehension of Violent and Prolific offenders (including calls-in- progress)
- Responding to all Home Invasions with MCU, assisting with the location of offender(s), and conducting a parallel investigation when a narcotics nexus is determined. (Should not simply act as an arrest team)
- Participating in large-scale joint operations (Warrant Round-Ups, EAPs)
- Being On-call for home invasions and violent crime trends
- Assisting Patrol/CID Units with all real-time leads to identify offenders during call-outs.

Actionable Intelligence Meetings

The weekly Actionable Intelligence Meeting (AIM) is comprised of at least one representative from every section in the agency in order to include areas that might not on the surface seem to have a role in such a meeting such as Court Services, Court Process, Child Protective

Investigations and School Resource. These areas can contribute a wealth of valuable information generated from their unique area of operation. Also in attendance are our media relations members and those members whose duties are primarily prevention based. Department of Juvenile Justice, Probation and Parole, other state agencies, and law enforcement agencies within and surrounding Pasco County also attend.

The focus of AIM is on hot spots, trends, prolific offenders, and information sharing. It also serves as de-confliction between units who unknowingly may be working the same target. Each meeting is based on crimes affecting each of our geographic districts. The intelligence analysts begin each meeting with offender and trend data for the area in question. Detectives, patrol deputies and all others weigh in on the information presented. While this meeting is moderated by a lieutenant or sergeant, it is not a roll call style meeting. It is a free flow of information by attendees who sit at a table in a large circle.

In addition to the inherent information sharing, the meetings also serve to eliminate the aforementioned "information silos." With obvious exceptions, all units are required to share the persons and areas of focus to allow for a holistic approach to solving their problems. In other words, we seek to integrate an "all crimes" approach to every case. For example, rather than working a drug dealer for drugs only, we would seek to integrate Economic Crimes, Property Crimes and Major Crimes when possible to explore other crimes that may be related to the suspect's drug involvement.

Although most types of cases investigated by Major Crimes are not UCR offenses, Major Crimes Detectives can contribute information on high-profile investigations that may affect other sections within the agency. In addition, many of the cases have a drug nexus so the meetings serve as a forum for Major Crimes Detectives to be able to communicate with Vice & Narcotics Detectives and the deputies who work the zone of the offense who may have valuable information to provide. Major Crimes Detectives should look to identify patterned offenses (typically robberies and sexual assaults) and communicate those patterns during Actionable Intelligence Meetings for dissemination to the rest of the agency.

While this meeting is moderated by the District Captain who will begin and end the meeting, the meeting should be used to exchange information with other district members, so it is vital that all sections within the district, as well as outside agencies, are represented.

Performance Expectations:

- When scheduled to attend the AIM Meeting, please bring information to share with the group on cases or persons of interest.

Supervisory Expectations:

- The information that goes into these meetings, as well as the products and initiatives that arise from these meetings are key components of a successful ILP program.
- Supervisors should ensure their deputies are prepared to share meaningful, actionable information when attending these meetings.

- Supervisors must provide a mechanism for the deputies attending these meetings to disseminate the information learned to the appropriate stakeholders within their area.
- Supervisors must coordinate with the chain of command to ensure a strategic operational plan is orchestrated from applicable information.

Crime Prevention

A key component of ILP is our agency's effort to reduce and prevent crime from occurring. A key component of preventing crime is to provide information to citizens and businesses through a variety of means to create awareness. The goal is to cause self-induced behavior modification to make them less likely to become victims of crime, thus effectively reducing incidents of crime.

Law enforcement agencies have long known the benefits of keeping the public informed about the state of crime in their community, and what the agencies are doing about it. This has historically been conducted via face-to-face meetings with individual citizens or citizens groups. Modern technology has also increased the capabilities available to law enforcement agencies in the ways that this awareness can be created in citizens.

The Pasco Sheriff's Office currently conducts information dissemination for the goal of creating awareness in citizens via the following techniques:

- Online resources such as websites, email distribution groups, social media accounts such as Facebook, Twitter, and YouTube; cell phone apps.
- Handouts, flyers, magnets, DNA kits, other giveaway items.
- Publicity campaigns such as Keep What's Yours, Lock Your Doors, Shoplifting PSAs, Don't Drink and Drive.

Forming sustained relationships with the public serves to reduce crime, inform the public and foster better relationships between law enforcement and the citizens we serve. Examples include:

- Neighborhood Watch Programs/Security Patrols/Business Watch Programs;
- Speaker's Bureau;
- Financial and other Industry-based programs;
- Pasco Police Athletic League, and Faith-based initiatives such as Celebrate Recovery and Renew Pasco.

Supervisory Expectations:

- Prevention is a crucial key component requiring supervisory input and direction. Many, if not most, deputies do not have backgrounds or experience in this area and may not know when and how to successfully engage in prevention activities.
- Not every crime trend or incident requires action. Similarly, not every crime trend or incident requires substantial action. Each prevention activity must be tailored to the unique situation.
- Supervisors need to be cognizant of and always searching for opportunities to inform and form alliances with the public.

- Supervisors need to lead with a mindset of, “If we did not have the power to arrest anyone, how could we solve this problem?” as this will force other options to be engaged or at least considered.
- A supervisor’s goal is to reinforce the agency’s mission to reduce crime and fear. Prevention are two very important tools in this arsenal.

Community Meetings

Developing rapport with, and informing, the public is a valuable tool in an intelligence-led policing environment. An effective way to accomplish this is to meet with the public in both formal and informal settings. Community meetings can be large, pre-planned organized gatherings of hundreds of people or can be as simple as a handful of concerned residents meeting in a living room.

Traditionally, members have viewed this as an activity to be coordinated by personnel assigned exclusively to a crime prevention function and, in many instances; we have waited to be invited to such events. However, informal and formal community meetings are a quick and effective way for patrol deputies and detectives to communicate messages to the public about their communities and to receive information and feedback from the citizens based on how they perceive their community.

When a member determines a community meeting may be warranted, he or she should coordinate with their supervisor as well as the Community Relations Section to arrange the most appropriate venue, format and overall value before committing to such an effort.

Performance Expectations:

- Look for crime patterns and trends that are impacting certain specific areas or a particular demographic component of our community. Once identified, look for civic associations, professional groups, etc., that are comprised of those members who would at least be open to hosting a meeting. Coordinate with your supervisor to include the district commander.

Supervisory Expectations:

- Informing the public and reducing fear are responsibilities supervisors must consider or paramount importance.
- Supervisors should not wait to be assigned community meetings. Rather, supervisors should seek opportunities to engage the public in meaningful and relevant dialogue.
- Meetings can be elaborate agency-wide events or can simply be a handful of tenants in a shopping center or residents in an affected neighborhood. Often, the public is reluctant to request such meetings. Therefore, it is incumbent on deputies and supervisors to be assertive toward this goal.

Cultivating Informants

Informants are persons who wish to share information on crimes and offenders. Confidential informants (CI’s) are vital to many types of investigations. The motives for becoming an

informant can include financial gain, revenge, fear, reform, or expectation of a lighter sentence. The development and use of informants are largely discretionary, but the agency member must exercise the utmost care in the control of the informant. Informants are cultivated by several methods: telephone interviews, tips, arrests, intra and interagency employees. The informant process is vitally important to areas such as the Narcotics Section who oversee the confidential informant program. To determine the usefulness and reliability of an informant, the informant has to be fully debriefed to determine what criminal information he or she is able to provide. After attempting to verify the validity of their information in order to help solidify their credibility, they have to be assessed in light of everything the detective knows, to include their motivation for wanting to be an informant; they have to be appropriately documented; and a complete background check needs to be completed. The confidential informant process is very valuable to the intelligence process and is a highly sensitive aspect of law enforcement. However, there are significant liabilities and legal guidelines associated with the use of Confidential Informants. Prior to taking any action regarding cultivating informants, members should consult their supervisor and be fully knowledgeable of and compliant with Directive LED 680.2, Informants in Criminal Investigations.

Performance Expectations:

- Not every person providing helpful information or acting as a confidential source is a confidential informant.
- Routinely seek information from and encourage the public to provide information on crimes and criminals.
- Members of the public wishing to be compensated should be referred to the appropriate investigative unit.
- No promises should be made as to compensation.

Customer Service Unit

The Customer Service Unit reads and reviews reports generated by Patrol to ensure proper classification, status type, follow up investigative unit, accuracy, overlooked details, and any discernable leads. The unit also calls the victims of all "inactive" cases checking for new or updated information. Supplemental reports are completed on all cases to help develop leads, ensure each case is properly classified and prevent cases from "falling through the cracks." Additionally, the Customer Service Unit is responsible for handling complaints to include those generated through social media such as Facebook or Twitter as well as other non-traditional sources.

Drug / Nuisance Location

An integral component of the sheriff's mission in the reduction of fear and quality of life issues brought to our attention by citizens who often suspect illegal activity relating to drug transactions are occurring there.

Performance Expectations:

- Communicate with likely complainants, when possible, in order to determine and or confirm exactly what type of problem exists; is it a nuisance location or a drug location, or both.
- Research location to identify occupants and their associates.
- Employ covert surveillance techniques to confirm complaint and or obtain additional information concerning the location (ie: the utilization of unmarked, undercover type of vehicles).
- Complete directed patrols to conduct traffic stops for the purpose of evidence and/or intelligence gathering and potentially generating an informant.
- Assess the location for the existence of county code violations, and when applicable, cite the owner/tenant.
- Consider the employment of the Knock and Talk tactic.
- Consider the utilization of Parole and Probation, when applicable.
- Consider the sharing of intelligence to other members in order that enforcement can occur at all hours of the day and all days of the week.
- Commit to the utilization of these resources and tactics for an extended period of time or until the location is no longer a nuisance.

Supervisory Expectations:

- Supervisors must assume control and responsibility over this process.
- Ensure proper notifications to appropriate units and the chain of command.
- Enact safeguards to prevent redundant efforts and to ensure proper de-confliction protocol are followed.

Enhanced Interviews

When engaging victims, witnesses and suspects, members should make every opportunity to explore learning about the criminal environment. For example: when transporting a subject to jail on a drug charge, the deputy should ask the subject about other crimes they may be aware of and willing to discuss. A part of the interview process with offenders should also include questioning the offender about victim selection. For example, "Why did you choose 123 Elm Street to burglarize instead of 125 Elm Street?" or "Why did you choose this particular neighborhood?" As always, deputies should be mindful of Miranda concerns and not engage suspects about the crime for which they are suspected of committing once the suspect has invoked his or her rights.

Enhanced Neighborhood Checks

Traditionally, neighborhood checks have been used as a means to determine if any neighbor in the immediate area might have valuable information regarding a particular crime a deputy is investigating. These contacts can have additional value as they can serve to not only elicit

information from the public but they can also serve to inform the public. Through maintaining good situational awareness about crime patterns in their assigned zone, deputies can determine when an area is experiencing a crime trend and seek ways to inform other potential victims in the area. For example, if a deputy is investigating an auto burglary on Elm Street and knows there have been multiple burglaries in the area, the deputy can extend and expand the neighborhood check by distributing available crime prevention literature focusing on burglary prevention and awareness.

Performance Expectations:

- Approach the neighborhood check process as an opportunity to share information with the public in near real time about crimes in their area instead of merely a necessary component of an incident report.
- Identify “attractive targets” (potential future crime victims)
- Gather neighborhood intelligence; “Who do you know?” “What has been going on?”
- Share information and resources that are available to the community i.e. Pasco Sheriff’s Office website (Community Resources)
- Educate the public on the Tip Submission link
- Look for opportunities to discover unreported crimes and potential evidence or valuable witnesses to possible trends.
- Access Crime Reports online to determine if there have been other similar crimes reported in the same general area and look for any similarities, possible leads, or property/evidence that may increase the solvability factors for the crime(s) being investigated.
- Identify location and environmental elements that are consistently present at crime scenes and make recommendations to victims to alter or remove elements that are attractive to criminal activity.

Supervisory Expectations:

- Supervisors must manage and direct this process to ensure efficient and proper utilization of this valuable tool. This may often mean returning to an area for follow up after the initial investigation is complete.

Field Interview Reports (FIR)

An integral part of solving crime is determining persons of interest in a particular area. An effective tool in doing so is the FIR. Often deputies use the FIR to document suspicious persons or vehicles. However, there is also value in using an FIR to document contact with nonsuspicious persons in a particular area at a particular time as a means of later contacting those persons as potential witnesses.

FIRs are different from tips and should be used in situations that have a closer relationship to crimes.

FIR Example: A neighborhood has been experiencing a high number of auto burglaries from 0100-0300 hours. While on patrol in that neighborhood during those times, you locate a male

walking down the street who lives a few streets away. He states he is merely out for a walk. A quick criminal history indicates he has prior arrests for auto burglary. An FIR should be completed.

Tip Example: Using the same scenario, while on patrol in the same neighborhood at the same time a resident exits her house and flags you down to tell you she has seen a white male on a red bike riding through the neighborhood every night between 0100-0300. A tip should be completed. (And possibly an Area Watch.)

Performance Expectations:

- Quality is far more important than quantity.
- Document the basis of the FIR. In other words, articulate why it was worthy of documentation and/or relate it to recent crimes in the area.

Forensics

Information collection is absolutely crucial to successful Intelligence-Led Policing and information can take many forms. A key form of information is the information and intelligence derived from crime scene evidence collection. Data gleaned from evidence such as tool pry marks, paint transfers, cloth marking, shoe/tire impressions and DNA is invaluable. When using the applied theory that a small percentage of criminals commit the majority of crime in the affected neighborhoods – the modus operandi of those criminals becomes extremely valuable information. Using other data such as Point of Entry (POE) patterns may further develop the probable “profile” of the offender. Successfully targeting known offenders may be enhanced by identifying certain trends and mannerisms used by those offenders. This is further confirmed through the proper collection and thorough analysis of physical evidence connected to the offenders.

Matching Forensic Investigators and Latent Print Examiners as liaisons with detectives and STAR affords our agency the opportunity to work proactively to reduce crime. Case reviews and AIM discussions allow Forensic Investigators to gain better understanding and cross dissemination of the physical evidence collected at previous crime scenes. This proactive dialogue better enables deputies and detectives to be mindful of what to specifically look for when targeting the suspected offenders in the targeted crime area.

Inner Perimeter Security Team

The Inner Perimeter Security Team (IPS) is maintained within the Court Services Division and each IPS Team is assigned to a schedule to assist as needed for intelligence gathering. IPS is the focal point of intelligence and each member of the IPS Team has intelligence duties assigned. IPS Teams also lead the bureau's gang initiatives, coordinating all comprehensive gang-related missions, and serving as liaisons to the Patrol Gang Intelligence Detectives. The Inner Perimeter Security Team facilitates intelligence gathering/sharing through a variety of means to include:

- Weekly AIM meetings, Read-Off attendance, and continual dialogue with ILP

- Collaborate with Detectives and Investigators to assist with any intelligence gathering required.
- Weekly sharing of informal and documented information for intelligence vetting by ILP and awareness to all members in the Detention Center.
- Remain proactive while in housing areas looking for information and intelligence.
- Closely follow the requests from inmates.
- Interview inmates to forward the information to the proper channels.

Intelligence Liaison Officers- Court Services

Intelligence Liaison Officers (ILO) are assigned to each area of the jail to include Intake and Release (Booking), Security Services (Inmate Housing), Bailiffs (East and West court) and every member of the Inner Perimeter Security (IPS) team. When a newly arrested individual is processed, an ILO assigned to the area will complete an initial interview. The Intake and Release ILO will review the arrestee's charges and location of arrest prior to the interview to tailor their line of questioning in accordance to the inmate's site of arrest and geographic location. An individual, who lives and commits their crimes on one side of the county, is not likely to have relevant information about the opposite side. Upon the completion of the interview, the ILO will conduct some research in reference to police reports generated to corroborate the information. Inmates are not questioned about the charge for which they are arrested. They are only questioned about other crimes in the community.

Security Services ILO's conduct interviews with inmates wishing to speak with detectives or wanting to give information. In many cases, inmates requesting to talk with a detective don't have detailed information. In this instance, the ILO is able to improve efficiency as it prevents the detective from making a wasted trip. Similar to Intake and Release ILO's, Security Services ILO's will conduct research prior to making contact with the inmate. ILO's primary focus is on the "Big 4" crimes: robbery, burglary auto burglary and auto theft. Though not the primary focus, most information offered by inmates pertains to drug activity.

One of the more important roles of the ILO's is to be the liaison for their platoons or squads. Other deputies are able to approach the ILO's for assistance and guidance when interviewing inmates. It is preferred deputies coordinate with their respective ILO prior to submitting a tip to ensure duplicate information is not being submitted.

Intelligence Liaison Officers- Law Enforcement

Each district is assigned an Intelligence Liaison Officer as part of an Intelligence Liaison Officer (ILO) Network. This network provides a better understanding of the crime picture for our deputies. It further expands our intelligence collection capability and allows for more informed decision making by our commanders to prioritize responses to crime problems, more effectively deploy personnel, and allow us to be more adaptable and responsive in preventing, disrupting, and dismantling emerging crime and terrorism threats to Pasco County.

Each ILO detective reports to the Property Crime lieutenant in their respective district, but works independently to collect crime-related and homeland security information from all the deputies, detectives, SROs and field sources within the assigned district.

The ILO detectives work closely with assigned ILP analysts to develop and evaluate actionable intelligence products for operational, tactical, and strategic decision making. The ILO detective also attends Actionable Intelligence Meetings (AIM) and is the conduit for information and intelligence sharing within the district. Duties include but are not limited to:

- Promoting awareness and collecting information on active offenders, criminal networks, crime locations, and assist with the coordinated and collaborative response of actionable intelligence.
- Managing confidential informants, debriefing offenders, identifying and developing intelligence gaps, and collecting information pertaining to prolific offenders and STAR areas.
- Working closely with state and federal intelligence officers to manage intelligence information within the region or any other location that may impact Pasco County, while operating within the guidelines of the National Intelligence Model (NIM).
- Engaging with fusion centers, serve as liaisons to help facilitate our agency's participation in regional information exchanges
- Ensuring our agency is a full partner in all information-sharing processes, such as the Nationwide Suspicious Activity Reporting Initiative.

Jail Call Monitoring

The monitoring of jail calls is a very time consuming, tedious task; however, it can have great value. Our inmate telephone system is currently contracted by Inmate Calling Solutions (ICS). The platform provided enables the facility to monitor and record all outgoing calls from the facility. Approved users of the ICS platform have access to the following facets of the systems: monitor live calls, search for past calls, record calls to CD, call forward inmate calls to their office or agency phone, and identify the called party and their home address. Often times, after a detective has spoken with a subject, the subject makes telephone calls that include discussion on the topic(s) for which the detective and the subject were discussing.

Performance Expectations:

- Usually this function is used by detectives, however all deputies have access to this service. Deputies who see investigative significance in monitoring a particular inmate's calls can contact an intelligence analyst in the ILP Section to coordinate.
- Prior to using this service it is incumbent on deputies to ensure efforts do not conflict with those of other investigative units.

Jail Interviews

Review the jail logs for those who have recently been arrested. Based on a predetermined formula that should include charges for, or a history of, the "Big Four", respond to the jail to debrief the subject(s) on crimes aside from those for which he or she was arrested, unless they are willing to discuss the crimes they have committed. Approach the interview from an intelligence gathering mindset, not necessarily an attempt to enhance the case for which the subject is arrested.

Jail Email

The Smart JailMail system is an inmate e-mail platform which will provide the inmate population an electronic means to communicate with friends and family. Investigative units now have the capability to monitor all incoming and outgoing correspondence by many electronic search parameters, such as: Inmate name, nicknames, code words, date range, etc. Mail can also be flagged by keywords used in the email. Examples of some keywords: court, crazy, kill, escape, murder, gun, beat, drugs, etc. This list can be changed or updated.

Investigators may also request to receive a copy of all inmate email correspondence.

The information and intelligence the investigators are able to obtain will be extremely beneficial to the investigative process as it may lead to solving a crime or preventing a future crime from occurring. In addition to the e-mail platform this system is capable of displaying agency caught on camera photos and most wanted photos in an attempt to solicit information from the inmate population relevant to these documents. The investigators can also link an email address to the inmates account in order to receive an immediate blind copy of all the inmates email communications.

Performance Expectations:

- Usually this function is used by detectives, however all deputies have access to this service. Deputies who see investigative significance in monitoring a particular inmate's emails can contact an intelligence analyst in the ILP Section to coordinate.
- Prior to using this service it is incumbent on deputies to ensure efforts do not conflict with those of other investigative units.

Jail Inmate Money Deposit System

This system allows individuals to deposit funds into inmate accounts via various means, such as telephone, web-site, kiosks and Money Gram locations. These transactions are recorded electronically which provides our investigators a database to utilize when conducting investigations. Money transactions can be searched by inmate, depositor, type of deposit, amount of deposit, date range, etc. Correlations can be identified and are displayed in a map format to show depositors that are depositing monies into various accounts. All web-site deposits are tracked by I.P. address which helps in locating depositors that may be subject to investigation.

Jail Video Visitation

This system serves as the sole means of visitation for the inmate population. All visits are conducted through a video camera and monitor in lieu of face to face visits. All of these video

visits are recorded and stored for a minimum of 30 days on a recording server and are available for playback at any time. All of our investigative units have access to this system for the purposes of monitoring a live or previous visitation. The investigators are able to utilize various search parameters to assist them in locating the visit they would like to view. The investigators can also flag individual visitors or inmates so they can be alerted prior to the visit occurring.

Juvenile Direct File

When a member identifies a juvenile who they believe is a prolific offender, they should forward the juvenile's name to their respective analyst to conduct a review of F.S. 985.557(1)(b). The analyst will compare the juvenile's criminal history to determine if the juvenile meets the criteria to be direct filed as an adult.

If the analyst determines the criteria appears to be met, the analyst should then forward the juvenile's name to the respective Captain. The Captain will then send the following letter to the SAO, via fax, and maintain a copy of the fax transmittal page to verify receipt and promote accountability.

The letter faxed over to the SAO should be on official PSO letterhead and contain the following narrative:

EXAMPLE OF SAO LETTER

My team and I have identified a chronic juvenile offenders which I respectfully request the SAO Direct File as an adult in reference to any and all pending and future criminal charges.

A Pasco Sheriff's Office analyst has conducted a review of the criteria listed in F.S. 985.557(1)(b) and determined this juvenile appears to meet the requirements to direct file as an adult. The names of the juvenile is:

1.) Name of juvenile, DOB, SS #

I am making this request due to the offender's extensive criminal history and in response to the adverse impact this individual has on the community when he/she is released from JDC.

If you have any questions or concerns about this request, please contact me.

Knock and Talks

Knock and Talks are employed in instances where there are allegations, preferably supported by other credible information, that a location, usually a residence, houses contraband. Typically, these are locations that detectives do not have informants available to purchase contraband, and the only logical method to determine if the contraband exists is to knock on the door and attempt to talk to those inside. The goal is to obtain consent to search from a resident with staying in the residence in order to find the contraband.

Performance Expectations:

- Deputies seeking to utilize a knock and talk should coordinate with the respective investigative unit as a means of de-confliction.
- Identify target residence and corroborate location with potential offenders.
- Conduct wants and warrants check on people suspected of living / being at the residence.

- Requires two deputies at a minimum: one deputy to search and the other to monitor for officer safety.
- Although most deputies will have operational BWCs, consider the necessity of obtaining written consent along with the verbal consent that should be captured by the BWC.
- Considerations need to be made with reference to a person's authority to authorize consent, the time of day/night, number of deputies present when consent is authorized, and offenders' ability to withdraw consent, the restricting of offender movements and when limited consent is given. For these consideration, reference the various case laws associated with the circumstance.

Supervisory Expectations:

- Supervisors must assume control and responsibility over this process.
- Ensure proper notifications to appropriate units and the chain of command.
- Enact safeguards to prevent redundant efforts and to ensure proper de-confliction protocol are followed.

Rapid Deployment

Rapid deployment is a simple, yet effective crime fighting technique rooted in three simple goals: preventing crime; reducing the public's fear of crime; and solving crime.

Rapid deployment of resources is designed to address existing and emerging crime patterns, sprees or trends. Studies have shown that a rapid, strategic and comprehensive response will significantly increase our ability to fight crime.

Supervisory Expectations:

Listed below is a scenario that explains and contrasts rapid deployment to how our agency has traditionally approach the same scenario:

Scenario:

Day shift deputies respond to six auto burglaries in the Forest Lakes subdivision. It appears all the vehicles were left unlocked and there were no signs of forced entry. The burglaries did not all occur on one street, however, they were in relative close proximity to one another.

Traditional Response:

In the past, we would conduct our normal neighborhood check and then contact night shift and said, "Hey...we were hit pretty bad in Forest Lakes last night, keep an eye out." As we all know, this response is ineffective and inefficient. We must, and will learn a better response.

New Expectation:

The Platoon Commander needs to know about these crimes as soon as more than one auto burglary is reported within a close geographic area so as to begin to consider the need for a rapid, strategic response. If, in fact, it does appear to warrant a rapid response, the Platoon Commander will develop an Operational Plan. Listed below is an example of an Operational Plan using the same scenario:

- On duty lieutenant (or affected zone sergeant) develops an operational plan and starts an email thread to the other lieutenants, zone sergeants, STAR, ACE, appropriate detective sergeant, specialized units, SRO, ILP Analyst and district captain. The plan will contain the following:
 - A synopsis of the event, such as “multiple auto burglaries in Forest Lakes between the hours of 0330 and 0500 hours.”
 - A list of the units that responded out to the initial scene, such as Patrol, Forensics, K9, Air, etc.
 - Any potential evidence, such as video surveillance, fingerprints, etc.
 - Items stolen (i.e. GPS, keys), if any, during the event or other important MO data.
 - List of any potential suspects, persons-of-interest information
- Each shift lieutenant, or anyone who has updated information on the operational plan, will add that information to the email thread, and send that email thread out via “reply all” so everyone in the email thread is aware of the update.

Suggested actions to be completed by the Lieutenant include, but are not limited to:

- Providing the ILP Section with BOLO information, to include videos or photos to be placed on Caught on Camera.
- Contacting PIO with information to be placed on the Sheriff’s Office Facebook page to include photos or video footage, if available.
- Contacting ILP Analyst to provide a list of warrants, juvenile pick up orders, potential subjects, etc. in the affected area so we can begin to target criminal offenders who may be involved, or have information on who was involved in the criminal activity.
- Contacting CSU to have a message board put in the affected area requesting citizens provide information, lock their cars, etc
- Arranging for neighborhood canvassing, enhanced neighborhood checks, distributing “lock your door” hangers in affected area. Any additional information on additional criminal activity should be submitted via a tip submission to Tipsoft.
- Check for homes with video surveillance. Ask to see video if there is any possibility the suspects may have passed by to and from the location of occurrence.
- Contacting the SRO’s to help develop intelligence and leads from students.
- Contacting Classification section at jail to identify associates of people being sought, through things like visitor’s lists, inmate mail, etc.
- Consider contacting other agencies (if appropriate), such as Code Enforcement for assistance, or other nearby agencies (i.e. NPRPD, Pinellas S.O., TSPD to determine if they have experienced similar problems and if they have developed any leads).
- Contacting that subdivision’s HOA/CDD board member, if applicable, to provide and solicit information.
- Contacting that subdivision’s private contract security, if applicable, to provide and solicit information.

- Arranging for specialized units to assist with random patrols and to blanket the area, such as:
 - Warrants
 - Motors/Step
 - ACE
 - STAR
 - CSU (can help with neighborhood canvass)
 - SRO (after school hours)
 - Sex Offender Unit
 - DOC (Probation and Parole) for probation checks

Many of these task can and should be implemented immediately. Rapid deployment of resources is the key. Delaying implementation allows the possibility for the criminal element to continue unabated.

It is understood that all the listed tasks will not be completed by the day shift Lieutenant. Effective collaboration and communication is the key to seamlessly integrating these strategies and preventing redundant efforts. For instance, the dayshift Lieutenant may develop a list of warrants in and around the target area, however, they may not have had the time or the resources necessary to begin serving them. Any incomplete tasks are documented in the operational plan and passed to the night shift Lieutenant for completion. The night shift Lieutenant will then work on completing the tasks and adding new ones, if appropriate. This process continues until all necessary tasks are completed.

It is also understood that as new information arises, the plan may change. Therefore, it is crucial that the plan remain fluid and flexible to adjust accordingly. For this approach to be effective, all lieutenants must focus on the following:

- Know what crimes your people are responding to.
- Determine if the crimes are isolated or part of an emerging crime spree, pattern or trend.
- If determined to be an emerging crime trend, you will need to develop a strategic and comprehensive response.
- Immediately implement this plan and prepare to pass this plan on to the next shift Lieutenant for completion.

School Resource Officers (SRO)

SROs interact with middle school and high school students from within their school's geographic boundaries on a daily basis and are in a unique position to augment the agency's ILP efforts in several ways. SROs can offer valuable assistance in areas such as offender identification and intelligence gathering. Often SROs will hear about past, present or future crimes well before others in the law enforcement community.

Performance Expectations:

- Patrol deputies and detectives should become acquainted with the SRO(s) assigned to their area as they can serve as a very valuable source of intelligence.

- The SRO Section can serve as a quick reference point for all recent juvenile arrests including documents case number, arresting deputy/officer, and school attended by youth, charge.
- SROs are available to distribute “Caught on Camera” photos to staff at their school by email in an attempt to identify suspects.

Social Network Analysis

The Pasco Sheriff’s Office recognizes the value of identifying criminal networks and formulating crime prevention strategies by focusing on the relationships and connections within the networks. Just as we have learned a small minority of offenders commit the majority of the crimes in our community, we have also come to understand these same prolific and chronic offenders are socially connected and their actions are often influenced or facilitated through various members of their networks. By understanding these relationships, we will be much more effective with our ILP crime reduction and prevention strategies. According to Dr. Fox, Mc Hale and Novak (2015), “accurately identifying and controlling deviant social networks can not only effectively reduce crime rates, but would also guide allocation of scarce resources to effectively accomplish crime prevention.”

Social network analysis offers a unique analytical strategy for crime analysts to explore the social relationships between individuals and groups, and visually represent the relationships using sociograms. These visual maps allow analysts to examine complex data sets to discover the social structures of the network and identify members with the most influence or importance within the group. Unlike link analysis, SNA allows us to impact these human networks in the way we strategically engage members based on the group dynamics. For example, link analysis simply helps us take out the bad guy, but every time we take out the bad guy another one is waiting in the wings. SNA goes further to offer an understanding of the trusted offender network and consider the best strategies to disrupt, dismantle, or influence the group. If we can visually map out the relationship types, affiliations, business ties, and other connections, we begin to identify strategic opportunities to control the behavior of the network. Using RMS data, field intelligence, and feedback from our deputies on each sociogram, analysts and law enforcement can work together to illuminate these offender groups and plan effective interdiction strategies to prevent crime.

Strategic Targeted Area Response (STAR)

For a variety of reasons, crime tends to generate hotspots of activity. Some hotspot locations are short term (acute) problems while some are long term (persistent) problems. The key to effective hotspot policing is to identify areas that are acute *and* persistent and to disrupt the crime patterns, trends, etc.

The purpose of the STAR program and the related STAR teams, therefore, is to reduce and disrupt crime in each respective STAR area through utilizing a wide array of tactics.

Each STAR area is created by analyzing acute and persistent crime trends and patterns. In most instances, the STAR will represent an area that comprises both acute and persistent crime. The effort will focus on a particular area for a minimum of 90 days unless compelling data suggests

the underlying crime problem is no longer present. This defined area is also referred to as “The Box.”

The STAR team primarily focuses on reduction of the patrol suppressible crimes referred to as the “Big 4” which are Robbery, Burglary, Auto burglary and Vehicle Theft. This is accomplished through working closely with patrol units, investigative units and community groups to identify and focus on prolific offenders impacting the area.

Performance Expectations:

Know where the STAR is in your district.

Know prolific offenders/persons of interest impacting the STAR.

Seek opportunities to innovatively impact crime, especially “Big 4” crimes in the STAR.

As a high crime area, develop and maintain rapport with STAR deputies and ACE detectives.

Surveillance

Surveillance may come in the form of mobile, stationary, electronic, aerial or foot surveillance. A pre-operative briefing should be conducted with all deputies involved to inform them of their expected duties and the goals of the operation. During this time, the lead deputy will communicate what the specified radio channel will be, who the target of the surveillance is and any other information pertinent to the target as well as the location or destination to be surveilled. Consider the utilization of the unmarked /undercover vehicle assigned to each district.

Tip Submissions

Often members receive information that does not necessarily warrant an actual offense incident report. Examples include information received from a citizen about potential offenders of certain crimes in an area, etc.

Once tips are submitted, the ILP Section will analyze the tip and the data will be stored in a database for future use. If the tip has current investigative value or relates to a specific investigation, it will be forwarded to the appropriate unit for follow up. The district secretaries, the ILP Section Tip Manager and the Narcotics Section Tip Manager all have access rights to close tips and it is important that each tip is properly closed when it is no longer immediately actionable.

Members have access to the tip management database for investigative purposes. Deputies may request a search on tips based on any key word that is listed in the original tip. For example, a search can be performed on the keyword “Spider” and the system will populate all tips where the word spider was mentioned in any way.

Tip submissions are only one way to become engaged in Intelligence-Led Policing and the emphasis should remain on quality, not quantity. Tips should not be submitted in place of an incident report or in addition to an FIR and when possible should contain actionable information

that can be analyzed to make arrests or prevent crimes. Deputies should not use the tip program as a replacement for taking immediate action or completing an offense incident report.

Example of a Good Tip:

“While investigating a noise complaint at 123 Elm Street, the resident, James Smith, told me that his neighbor at 125 Elm Street, John Jones, approx age 35, has been bragging about all the stolen Ipads he has. Smith said Jones has even offered to sell him some Ipads a few months ago.”

Example of a tip with little value:

“An anonymous subject approached me at 7-11 at Moog and US 19 and told me that a guy named Tommy is dealing drugs in the area.”

Narcotics Tip Criteria

For a tip to be assigned to Special Investigations, the tip needs to meet at least one of the following criteria. Detectives can be assigned tips not meeting these criteria as dictated by Supervisors. In no way do these criteria restrict a Narcotics Detective from working tips not meeting these criteria.

Prolific Drug Offenders (those with extensive long term history)

- Violent drug tips
- Methamphetamine Labs
- Marijuana Grow Operations
- Related to Confidential Informants
- Tips that provide information on open/pending cases
- Doctor shopping cases
- Specific drug information when there is a history present
- Gambling
- Gang Activity

Tips not meeting these criteria will either be closed out as information only, assigned to a patrol district, or placed on the District Quickr site for deputies to work.

Section Six: Available Tools/Resources

Actionable Intelligence

Each week, the ILP Section publishes an Actionable Intelligence product which also list intelligence gaps and requirements. As the name implies, this document lists areas where crime patterns are happening and additional information is needed to help improve solvability and gain situational awareness. Members are encouraged to use community contacts and enhanced patrol techniques to collect and submit information for analysis. Deputies should also consider the information contained in Collection Requirements as an opportunity to prevent crime through engaging proven crime prevention practices Deputies should also consider the information contained in the Actionable Intelligence weekly product as an opportunity to prevent crime through engaging proven crime prevention practices. It is important that deputies use this document as a source of situational awareness for their respective zone as it relates to critical intelligence gaps.

Performance Expectations:

- Review the Actionable Intelligence thoroughly upon receipt and seek opportunities to gather information/intelligence needed.
- Develop credible sources in and affecting your respective zone.
- Submit valuable tips and FIRs.

Crimereports.com

Crimereports.com is an external vendor of the sheriff's office. All records management data is sent to this vendor on an hourly basis who then converts the information into a wide range of usable data such as offense mapping, hotspots, etc. Its CommandCentral feature starts with a real-time, customizable crime dashboard that gives deputies more than 1,000 ways to analyze and view crime data and information. Deputies can choose their preferred layout, what they want to see, and how they want to see it - including maps, area breakdowns, crime-type analysis, time of day/day of week analysis, and more. Each district ILP Analyst is available to provide training and to help customize each members "dashboard."

Crime Stoppers

Crime Stoppers of Tampa Bay is a community based program, which is designed to bring law enforcement, the news media and the citizens closer together in an effort to combat crime and make the community a safer place to live. Crime Stoppers acts as a clearing house for information... and encourages people who know about crimes or about people who have committed crimes to call and give Crime Stoppers details. Crime Stoppers offers rewards to people who call. People remain anonymous when they call. They do not know the identity of people submitting tips or receiving payment/rewards.

On occasion, deputies will be assigned a Crime Stoppers tip to investigate. These tips are unique and come with a disposition form that needs to be completed for administrative purposes. Rarely, deputies will coordinate directly with Crime Stoppers. Tips received from Crime Stoppers will be processed by the ILP Section. On those instances when our agency desires to enlist the aid of Crime Stoppers, Major Crimes or the ILP Section will serve as the point of contact.

Electronic Signage

An effective means to prevent crime, solicit tips to help solve crime, and inform the public about crime occurring in their area is usage of the electronic roadway signs. These signs are maintained by the Citizen Support Services Section. The most effective messages are those that are no more than three successive screens informing and directing the citizens.

BWI

BWI is the pawn database to which all pawn transactions that occur within Pasco County are reported. BWI is the replacement for "FINDER" which was previously used by PSO. Authorized users can query transactions by several different search parameters, including Name/Seller, Vehicle/License Plate Number, and Article(s) pawned. To request a new user account, BWI can be accessed through the agency intranet page under Links.

Once a possible suspect is identified, for example, users can access BWI to determine if the subject has any recently pawned items that matches stolen property. A reverse search may also be performed and users can match unique pieces of property against items reported stolen. The Article Query Advanced Search Section of BWI is a valuable tool that can help aid in the apprehension of suspects. Another use of BWI is the Frequent Pawner and Scrapper Top Pawner option which has been utilized to help aid in the identification of potential suspects. This option may bring to light subjects that have been making frequent pawn transactions, but have not yet been identified as persons of interest in local criminal activity. For additional assistance, please contact an ILP Analyst.

Mapping

One of the biggest innovations in law enforcement in recent years is the implementation of geographic information systems (GIS) or mapping. GIS integrates hardware, software, and data for capturing, managing, analyzing, and displaying all forms of information related to a specific geographic place of interest.

GIS allows us to view, understand, question, interpret, and visualize data in many ways that reveal relationships, patterns, and trends in the form of maps, globes, reports, and charts. Our mapping capabilities allow us to accomplish such tasks as defining where things are, quantities, densities, what's nearby and how conditions are changing. Common uses within our agency includes maps illustrating locations of crimes, offender addresses, persons of interest, hotspots, crime density changes and geographic profiling which examines the relationship of crime to offender locations.

Social Media Analysis

Geofeedia is a social media management platform that lets members search, engage with, and analyze real-time social media content by location, from anywhere in the world, with a single click. Starting the search is as easy as drawing on a map. Members may search for any location in the world, from an entire city to a specific address, and visualize real-time, location-based social media content in a matter of seconds. This service allows members to discover and aggregate geolocation social media posts from any user-defined worldwide location, monitor multiple locations in real-time, archive, curate and share social media content, and analyze patterns and trends from location-based social media data.

Surveillance Camera Registration

Security cameras are a valuable component to identifying criminals. As part of this effort, our agency uses the Crimereports.com camera registration program. Deputies can encourage willing citizens to assist our crime fighting efforts by securely identifying and registering the location of their residential or commercial security cameras. As users sign up, providing their contact information, camera information, and location, the information will automatically be available to you. Whenever there is a crime, you can access the list of registered cameras and contact the owners, saving you time and effort during emergency responses and investigations.

Top 5 and Target of the Month

The TOP-5 and Target of the Month are produced by ILP and are individuals identified as being the “worst of the worst.” For an individual to be placed on this product, the question must be answered about him/her “if this person is removed from the area, will it result in a significant impact by decreasing crime in the area?” Along with this product will be tied the “spider chart” which will identify all the known associates of the target. The ILP district analysts will determine the appropriate targets for both products and present those name(s) to the district commanders. Both products will be presented by the analyst at the weekly district AIMs and at the quarterly AIMs. The TOP-5 product will be used for long term targets and the Target of the Month will be utilized for short term targets. Both targets will be on the ILP Intranet site and available 24/7 to all PSO members.

TLO

TLO is a web-based research tool allowing users to search for information on persons or places of interest. The search can be based on incomplete source information such as partial tags or vehicle information and is used to identify people and determine possible addresses, phone numbers, family members, and associates, among others. Deputies have full access to this program.

Unified Report

The Uniform report is a summary of the "morning report" with additional entries from the cities in Pasco County. Each report begins with a list of the "Big Four" patrol suppressible crimes, namely burglary, auto burglary, vehicle theft and robbery that occurred in the county during the previous time period.

Each daily report contains a list of the previous day's occurrences and the Monday report will contain the weekend data. In addition to this information being emailed, it is also available in the ILP Quickr site under the heading "Uniform Daily Report."

Section 7: Best Practices and Activities/ Operational Plan Examples

Law Enforcement

- Learn as much as possible about prolific offenders, probationers and other persons of interest in your assigned area to include known acquaintances, vehicles, locations frequented, and previous M.O. for prior offenses, etc. Share this information via tips, emails, and other forms of communication with other stakeholders.

- Learn the location of the STAR and strive to gain a full understanding of the nature of the problems occurring. Develop and maintain rapport with deputies assigned to the STAR.
- Use Crimereports.com, One Solution and other available resources to remain abreast of existing and emerging crime trends in your area. Sign on daily to see where and when crimes are occurring.
- On every call for service, investigate thoroughly and look beyond the call for service. Once complete, prior to leaving ask the persons interviewed if they have information about any other crime they may want to share regarding possible offenders or offenses occurring in the area. (Use judgment when pursuing this opportunity.) Document accordingly via tip or offense incident report.
- While transporting arrestees to jail, develop a rapport with the arrestee. If he or she has invoked Miranda, do not ask any questions about their crime whatsoever. However, you may ask them if they know of other unrelated crimes committed by other people. Document accordingly.
- Approach the neighborhood check process as an opportunity to share information with the public in near real time about crimes in their area instead of merely a necessary component of an incident report.
- Seek opportunities to generate tips and FIRs as a means of gathering information and intelligence. Document the basis of the FIR or tip. In other words, articulate why it was worthy of documentation and/or relate it to recent crimes in the area. Quality is far more important than quantity.
- Review the collection requirement thoroughly upon receipt and seek opportunities to gather information/intelligence needed.

Detention

- Interview inmates processed in booking for potential intelligence and tips. If TOP-5 is processed, interview and make mandatory notifications.
- Review email in Smart JailMail for potential information that can be used against the inmate or lead to additional tips.

- Take quality mugshots. Document scars, marks, and tattoos with good photos and descriptions.
- Enter as much information in JMS as possible during processing.
- Be cognizant of conversations amongst other inmates that may allow for investigation opportunities. Reach out to ILO and IPS if needed. Allow these interviews to occur in an environment that is away from other inmates to help protect the inmate and make him feel more comfortable.
- RapidID inmates to identify potential aliases. Query these additional names for potential warrants and add them to the master name record in RMS.

Operational Plan-Rapid Deployment

- On duty lieutenant (or affected zone sergeant) develops an operational plan, and starts an email thread to the other lieutenants, zone sergeants, STAR, ACE, appropriate detective sergeant, specialized units, SRO, ILP Analyst and district captain with the following:
 - A synopsis of the event, such as “multiple auto burglaries in Bridgewater between the hours of 0330 and 0500 hours.”
 - What units responded out to the initial scene, such as Patrol, Forensics, K9, Air, etc.
 - Any potential evidence, such as video surveillance, fingerprints, etc.
 - Items the suspects took (i.e. GPS, keys), if any during the event
 - Any potential suspects, persons-of-interest information
- Each shift lieutenant, or anyone who has updated information on the operational plan, will add that information to the email thread, and send that email thread out via “reply all” so everyone in the email thread is aware of the update. The following are suggested activities to be completed by the Lieutenant (or affected zone sergeant):
 - Providing ILP (and possibly Crime Stoppers) with BOLO information, to include videos or photos to be placed on Caught on Camera
 - Contacting PIO with information so it can be placed on the Sheriff’s Office Facebook page. If video or photos are available, they should be provided to the PIO
 - Contacting ILP Analyst to provide a list of warrants, juvenile pick up orders, potential subjects, etc. in that affected area.
 - Contacting CSU to have a sign board put in the affected area requesting citizens provide information, lock their cars, etc.
 - Arranging for neighborhood canvassing, enhanced neighborhood checks, distributing “lock your door” hangars in affected area. Any additional information on additional criminal activity should be submitted via a tip submission to Tipsoft
 - Contacting the SRO’s to help develop intelligence and leads from students.

- Giving high school SRO's suspect vehicle information so they can check their student parking lot for similar vehicles.
- Contacting Classification section at jail to identify associates of people being sought, through things like visitor's lists, inmate mail, etc.
- Contacting other agencies, such as Code Enforcement
- Contacting that subdivision's HOA/CDD board member, if applicable, to provide and solicit information
- Contacting that subdivision's private contract security, if applicable, to provide and solicit information
- Contacting newspaper delivery persons, post office delivery people, mosquito control, etc. to give them information about suspects/vehicle description.
- Arranging for specialized units to assist with random patrols, to blanket the area, such as:
 - Warrants
 - Motors/Step
 - ACE
 - STAR
 - CSU (can help with neighborhood canvass)
 - SRO (after school hours)
 - Sex Offender Unit
 - DOC (Probation and Parole) for probation checks

Operational Plan Outcome Examples

Auto Burglaries in Bridgewater Subdivision – Y3

On 5/12/15 between 0400 and 0500 hours, eight delayed auto burglaries to unlocked vehicles occurred in the Bridgewater subdivision. During a neighborhood canvass, surveillance video from several residences was obtained and two suspects were seen committing the burglaries. Forensics and Property Crimes responded to the scene. An operational plan was put into place which led to the following results:

- An email thread was started by the dayshift lieutenant, with the details of the cases, to include MO, property stolen, investigation completed, and results of neighborhood check (surveillance video).
- The email thread was sent to all of the other D2 lieutenants, zone sergeants, property crimes sergeant, district captain, STAR, SRO, and ILP. The email thread continued from shift to shift with any updates to the investigation.
- An enhanced neighborhood check was completed which resulted in videos being obtained at 3 residences showing the suspects.
- Directed patrols were performed in the neighborhood by each shift.
- The video was submitted to Pasco SO PIO, and placed on the Pasco SO Facebook page.
- An electronic sign board was placed on Curley Road, at the request of the lieutenant, requesting citizens lock their cars, remove valuables, and report suspicious activity.
- Information about the crimes was sent to the Bridgewater HOA/CDD president to send out to residents.

- An anonymous tipster identified one of the suspects (juvenile) from the Pasco SO Facebook page.
- PCU detectives went to Wesley Chapel High and obtained the identity of the suspects, from school staff. The suspects now attend James Irvin Educational Center.
- PCU detectives went to James Irvin Educational Center and confirmed the suspect identity with SRO.
- On 05/19/15, PCU detectives search and locate both suspects, and recover stolen property at their residences. Both suspects arrested on 7 auto burglaries, as well as possession of a controlled substance.

Armed Robberies/Attempted Armed Robberies to CVS/Mobil Gas/Taco Bell – Y4/Y6

On 09/23/2015 at approximately 0158 hours and 0753 hours in Land O' Lakes and Wesley Chapel, there was an attempted armed robbery at Taco Bell, and two armed robberies at CVS and a Mobil gas station. All three incidents have similar suspect descriptions. During the Taco Bell attempted armed robbery, the suspect pointed a gun at the employees, but was unable to gain entry into the business and he fled on foot. A perimeter was set, and K9 responded along with Hillsborough County Sheriff's air unit but the suspect was not found. Forensic responded to process the scene. Hillsborough County Sheriff's Office advised they had a Robbery with a similar MO off Bruce B Downs at a pizza restaurant.

At approximately 0630 hours, day shift and night shift Yankee responded to CVS for a robbery call. A masked suspect came into the store and demanded money from the cash register. The suspect had what appeared to be a short barrel revolver. After receiving money from the register, the suspect departed in a west bound direction on foot. A perimeter was established and K9 and the air unit were called out. Other units from the agency also responded, to include D1 and D3 patrol and detectives, Warrants, Ag Unit, Motors, and Major Crimes. Prior to K9, Air, and some of the other units arriving on scene, another armed robbery (see below at Circle K/Mobile) with the same suspect description occurred west of the CVS, so resources were deployed to that location.

At approximately 0753 hours, multiple units mentioned above were deployed to Circle K/Mobil for a robbery call with the same suspect description/MO as above incident at CVS. The suspect ran out of the store in an east bound direction and got into a small blue vehicle and fled the scene. The multiple units were deployed to various intersections to BOLO for the vehicle, but the vehicle was not observed. The multiple units were then deployed to conduct extensive neighborhood/business checks in order to locate potential witnesses and video. The FBI responded to the scene.

MCU arrested four suspects the night of the robberies due to the concentrated/coordinated efforts of all the units who responded to the scene. This includes members from other districts. Responding supervisors should remember there is no longer a restriction on who they request to be deployed to assist in emerging crimes. If units need to be pulled from other districts to assist, it should be done without resistance.

Auto Burglaries/Grand Theft Autos - Y5

On 10/07/15 the District 2 STAR Team conducted proactive surveillance in the Wesley Chapel area in reference to an emerging crime trend of auto burglaries and auto thefts from the area. At approximately 0235 hours, STAR Team members observed people in three vehicles committing burglaries in the Northwood Palms subdivision. When STAR attempted to conduct a traffic stop on the vehicles, they fled, so STAR pursued them. Eventually, STAR was only able to stay with one of the vehicles as they began to separate. The vehicle was pursued into Hillsborough and Pinellas Counties where the vehicle eventually wrecked and the driver was arrested unharmed.

The D2 lieutenant monitored the entire pursuit and responded to St. Petersburg to help coordinate efforts. A subject was arrested on multiple burglary charges, vehicle theft, aggravated fleeing to elude, and aggravated assault on a law enforcement officer as he attempted to strike a deputy with his vehicle while fleeing. Through this case, the STAR Team was able to clear at least 10 cases with this arrest.

Auto Burglaries – Y5

On 10/07/15 at approximately 0515 hours, third and first shift along with K-9 and Air responded to Lexington Oaks after a citizen reported a burglary in progress. The first unit arriving went to the reporting person's location to obtain suspect information, while the next unit went to the Lexington Oaks exit, to stop all traffic leaving the subdivision. While each vehicle was checked leaving Lexington Oaks for the suspects, other responding units set up perimeter, awaiting K9's arrival. K9 Deputy Lennox was able to establish a track and apprehended three black males who were all from East Tampa.

Multiple PCU2 units responded to assist, and the three suspects were arrested for 18 auto burglaries and one grand theft auto, as the vehicle the suspects had arrived on scene in was stolen from Tampa.

Section 8: ILP: In Their Own Words

The information below is presented from the perspective of an actual patrol deputy who has proven to effectively utilize the practices, tactics and tools of Intelligence-Led Policing.

- *Make contact with convenience store clerks. They are a great source of Intel and the bad guys talk freely in front of them. If you have a good rapport with the clerks, they give you good info. They tell me what vehicles bad guys are riding in and who they are hanging with.*
- *Treat everyone you come in contact with respect, especially the ones you're arresting. I have numerous subjects I have arrested multiple times, that still give me good Intel, because I treat them with respect and don't demean them. I treat them the way I would like to be treated if I was being arrested, unless they are giving me a reason to treat them differently, at which point I let them know who's in control of the situation.*
- *Work people that hang out together. When you find there is a riff between subjects, especially subjects dating, use that time to your advantage. Angry girlfriends or boyfriends will give all kinds of info about what the other is doing when they're fighting.*
- *Talk with residents in problem areas, they see all that goes on but rarely call in the info. I provide my S.O. email address and ask them to send me tag numbers of vehicles and updates of issues they see going on. I also provide them the S.O. website info and how to send in tips. Taking a few minutes to go back and talk with neighbors afterwards goes a long way with them, and shows you care about what they are telling you, which usually results in better info from them.*
- *During traffic stops, if it's not a criminal citation, I use verbal or written warnings whenever feasible. If it is an arrestable offense, I'll let them sweat the thought of going to jail, and when they ask if they're going to jail, I tell them there's a good possibility, but let me see what I can do. I'll then try getting a conversation going with them to see what kind of Intel I can pull from them, I find that if you are vague with what info you're looking for at first, they'll usually start providing detailed info, and then let them run with it. Listening to them is key, if you interrupt too much, you'll lose the conversation. I'll then tell them that due to them being so helpful, I'm just going to write them a citation with a court date instead of taking them to jail.*
- *Run tags! I'll sit across from the convenience stores where I know my offenders in the area tend to hang out. I run tag numbers to see who is driving and if they're legal. It also lets me know who the subjects are, so when I have contact with them elsewhere, I call them by name. I find knowing subjects before you have contact with them, and then calling them by name when you have contact, confuses them, but gives me the upper hand. Then when I start conversing with them, they don't know what I already know, and during the conversation, I let them run on. I find the less I talk with them and just listen and acknowledge them, the more info they end up giving me without even knowing they're giving it.*
- *As with any dealings with offenders, they're going to lie. I let them lie to me, even when I know they are, and let them think they're getting one over on me. When I talk with other subjects about the same dealings, I pull the good Intel and do my best to separate the lies from the truth. I'll keep the lies they tell me in mind, and use it against them when it helps my cause, which then usually results in better Intel.*
- *Finally, the main thing I tell subjects, especially the offenders providing info, is that I will never put their name in a report or tell anyone they gave me info, unless I am ordered by court. I don't tell zone partners who gave me the info or tell other offenders that so and so told me this or that. I continue to get good info because the subjects know they are going to remain anonymous. It takes some time to develop that kind of rapport, especially with offenders, but once they know you're*

not telling where the info came from, they'll start calling and giving info on their own. I get a lot of phone messages with subjects wanting to tell me things that are going on.

Section 9: Key Terms and Definitions

Hot Spot

A group of similar crimes committed by one or more individuals at locations within close proximity to one another.

Examples: Eight daytime burglaries over the past four weeks at a suburban residential subdivision, with no notable similarities in method of entry or known suspects; ten commercial burglaries over the course of three weeks at businesses located within a half-mile radius during overnight hours.

Information

Information is raw data; it could be an item obtained from a newspaper report, a statement made by a confidential informant, or simply an observation made by a deputy during a traffic stop. In and of itself, it is rare that action can or should be taken on raw, unevaluated information on its own.

Intelligence

Information that has been analyzed becomes intelligence. The process that turns raw information into something useful is analysis; the product is intelligence. Information+Analysis = Intelligence.

Pattern

A crime pattern is a group of two or more crimes reported to or discovered by law enforcement that are unique because they meet each of the following conditions:

- They share at least one commonality in the type of crime; behavior of the offenders or victims; characteristics of the offender(s), victims, or targets; property taken; or the locations of occurrence;
- There is no known relationship between victim(s) and offender(s) (i.e., stranger-on-stranger crime);
- The shared commonalities make the set of crimes notable and distinct from other criminal activity occurring within the same general date range;
- The criminal activity is typically of limited duration, ranging from weeks to months in length; and
- The set of related crimes is treated as one unit of analysis and is addressed through focused police efforts and tactics.”

Series

A group of similar crimes thought to be committed by the same individual or group of individuals acting in concert.

Examples: Four commercial arsons citywide in which a black male, between the ages of 45-50, wearing yellow sweatpants, a black hooded sweatshirt and a yellow “Yankees” cap, was

observed leaving the commercial structures immediately after the fire alarm was triggered; five home invasion-style robberies involving two to three white males in their 20s wearing stockings over their faces, displaying a silver, double-barreled shotgun, and driving a red 1980s Pontiac Trans Am.

Spree

A specific type of series characterized by high frequency of criminal activity within a remarkably short time frame, to the extent that the activity appears almost continuous.

Examples: A rash of thefts from auto at a parking garage over the course of one hour; multiple apartments in a high-rise building burglarized during daytime hours on a single day.

Trend

A trend is a persistent, long-term rise or fall in data based on time and indicates a direction. Crime trend information can be useful in alerting us to increases and decreases in levels of activity. However, since crime trend analysis does not examine shared similarities between specific crime incidents, a crime trend is not a crime pattern.

References

- Boba, R. (2009). *Crime analysis with crime mapping*. Thousand Oaks, CA: Sage.
- Boba, R., & Crank, J. (2008). Institutionalizing problem-oriented policing: Rethinking problem identification, analysis, and accountability. *Police Practice and Research*, 9 (5), 379-393.
- Carter, P. (2009). *Law enforcement intelligence: A guide for state, local, and tribal law enforcement agencies*, second edition. Washington DC: U.S. Department of Justice, Office of Community Oriented Policing Services.
- Center for Problem-Oriented Policing. *A Theory of Crime Problems*. 1994. 22 September 2015 <<http://www.popcenter.org/learning/pam/help/theory.cfm#banner>>.
- Center for Problem Crowe, Timothy D. *Crime Prevention Through Environmental Design (CPTED)*. Woburn, MA: Butterworth-Heinemann, 1999.
- Oriented Policing (www.popcenter.org)
- Eck, J., Chainey, S., Cameron, J., Leitner, M., & Wilson, R. (2005). *Mapping crime: Understanding hotspots*. Washington, DC: U.S. Department of Justice, National Institute of Justice.
- Federal Bureau of Investigation. (2013). *Intelligence Cycle*. Retrieved 2013, from FBI.Gov: <http://www.fbi.gov/about-us/intelligence/intelligence-cycle>
- Fox, A., Novak, K., McHale, J. (2015). Using Social Network Analysis to Guide Law Enforcement Strategies. *Translational Criminology*, Fall 2015, 6-8.

"Having an Impact on Crime." Ratcliffe, Jerry. *Intelligence Led Policing*. NY: Routledge, 2008. 166-172.

National Counter Terrorism Center. (2004). *Intelligence Reform and Terrorism Prevention Act of 2004*. Retrieved 2013, from nctc.gov/docs/pl108_458.pdf; nctc.gov/docs/pl108_458.pdf

Ratcliffe, J. (2008). *Intelligence-Led Policing*. Portland: Willan Publishing.

US Department of Justice. (2003). *National Criminal Intelligence Sharing Plan*. Washington, DC: Government Printing Office.

Additional Readings

Reducing Crimes through Intelligence Led Policing by Bureau of Justice Assistance
https://www.ncirc.gov/documents/public/reducing_crime_through_ilp.pdf

Policing Problem Places: Crime Hot Spots and Effective Prevention by Anthony Braga and David Weisburg.

Implementing Responses to Problems (USDOJ COPS publication <http://ric-zai-inc.com/ric.php?page=detail&id=COPS-P131>)

Crime Prevention Research Review Police Enforcement Strategies to Prevent Crime in Hot Spot Areas (USDOJ COPS publication <http://ric-zai-inc.com/ric.php?page=detail&id=COPS-P140>)

Problem-Solving Tips: A Guide to Reducing Crime and Disorder through Problem-Solving Partnerships (USDOJ COPS publication <http://ric-zai-inc.com/ric.php?page=detail&id=COPS-P019>)

Addendum

Strategic Targeted Area Response (STAR) Team Manual

Introduction

The Strategic Targeted Area Response (STAR) Team was created as an important part of the agency's crime fighting strategy. For the STAR Team to be successful, the principles that guide the STAR Team's thinking and actions must be clear. This manual was developed to eliminate any confusion regarding the STAR Team's mission, objectives, strategies, expectations and overall philosophy.

Mission, Objectives and Expectations

The Strategic Targeted Area Response Team is dedicated to reducing the top 4 UCR crimes in the district, with particular emphasis inside the STAR box and the immediate surrounding area.

As a result, there is an expectation that the STAR Team will spend 50% of their time working inside the STAR box (and the immediate surrounding area). The team will utilize various strategies while operating within the STAR box. All strategies must be centered on the following three objectives:

- Prevent crime (with particular emphasis on the Big 4)
- Reduce the public's fear of crime (with particular emphasis on the Big 4)
- Solve crime (with particular emphasis on the Big 4)

The 50% time reference is not a meaningless percentage designed to promote meaningless activity. Instead, this expectation was created to enhance accountability to ensure our STAR Teams are focusing their efforts where those efforts are most needed. The goal is effectiveness, not busy work.

STAR Team members must engage all available resources to assist them in accomplishing their mission and objectives.

Strategic Focus

The STAR Team is expected to actively work with other PSO members (particularly ACE and ILP) and outside agencies to identify and target prolific offenders. They will also assist in responding to emerging crime patterns and trends. They will regularly develop missions to target the “Top 5” and “Target of the month.” Due to the fact that 6% of the criminals commit 60% of the crime, targeting prolific offenders should be an important part of daily crime fighting strategies.

In instances where these missions cause STAR Team members to leave the STAR box, they will check out “Signal 15” and document the top 5, target of the month, and/or emerging crime trend/location they are working on. Occasionally, STAR Team members will assist other Districts with EAPs and special missions. All the above listed activities outside the STAR box will dominate the remaining 50% of the STAR Team’s time.

Assignments outside scope of regular duty

STAR Units are not the “Fugitive Apprehension Squad” for Property Crimes. However, they can assist with picking up prolific offenders when detectives develop Probable Cause to make an arrest.

Tip Procedures

STAR Units will not be assigned random tips/complaints outside the STAR box. However, STAR members should expect that tips outside the STAR box related to the STAR box will be assigned for investigation and clearance. Regardless of the nature of the tip, STAR Team members will act on the tip with an emphasis on preventing and solving Big 4 Crimes.

Tip Protocol

STAR Team members are encouraged to access the tip management database for investigative purposes. STAR Team members may conduct a search on tips based on any key word that is listed in the original tip. For example, a search can be performed on the keyword “Spider” and the system will populate all tips where the word spider was mentioned in any way.

STAR Team members will interact with members of the community (to include arrestees, suspects, victims, and witnesses) with a strategic focus on developing actionable intelligence, with particular emphasis on Big 4 crimes inside and around the STAR box area.

An example of this type of information would include information received from a citizen about potential offenders of certain crimes in an area, etc.

When appropriate, STAR Team members will document this information via a tip submission. Once tips are submitted, the ILP Section will analyze the tip and the data will be stored in a database for future use. If the tip has current investigative value or relates to a specific investigation, it will be forwarded to the appropriate unit for follow up. The district secretaries, the ILP Section Tip Manager and the Narcotics Section Tip Manager all have access rights to

close tips and it is important that each tip is properly closed when it is no longer immediately actionable.

Tip submissions are only one way to become engaged in Intelligence-Led Policing and the emphasis should remain on quality, not quantity. Tips should not be submitted in place of an incident report or in addition to an FIR. When possible, submitted tips should contain actionable information that can be analyzed to make arrests or prevent crimes. STAR Team members should not use the tip program as a replacement for taking immediate action or completing an offense incident report.

Example of a Good Tip:

“While conducting an enhanced neighborhood check at 123 Elm Street, the resident, James Smith, told me that his neighbor at 125 Elm Street, John Jones, approx age 35, has been bragging about all the stolen Ipads he has. Smith said Jones has even offered to sell him some Ipads a few months ago.”

Example of a tip with little value:

“An anonymous subject approached me at 7-11 at Moog and US 19 and told me that a guy named Tommy is dealing drugs in the area.”

STAR “Box”

The STAR box is developed using crime statistics and hot spot trends and patterns to help identify the area within a specific district that is experiencing consistent, heightened top four UCR crimes (aka Big 4 - robbery, burglary, auto burglary and auto theft). The STAR box area is targeted because crime is persistently dense in this area over an extended period of time. Generally, the STAR box area accounts for 20%-25% of the total amount of Big 4 crimes occurring in our district. The data utilized to determine the STAR Box location is re-evaluated every 90 days to ensure the STAR Team’s efforts are consistently focused in the areas that need it most.

Pro-arrest Philosophy

When operating in the STAR Box, our philosophy will be pro-arrest in nearly every situation where probable cause exists and will strategically support the mission. Decisions to arrest for crimes not part of the mission will be made on an individual basis.

Assisting Patrol

STAR Team members will assist with major events and significant calls for service throughout the district, when needed. This does not apply to standard calls for service. When STAR Team members assist patrol on a call for service, there needs to be exigent circumstances to justify this departure from their primary mission. Immediate officer safety related calls and crimes in progress where STAR Units are close by are examples of calls for service where it is appropriate to assist.

Crime Experts

To be effective in your mission and objectives, STAR Team members are expected to know and understand what criminal activity is occurring in the STAR box, with particular emphasis on Big 4 crimes and emerging crime trends. They are also be expected to understand any emerging crime trends occurring outside the STAR box that may impact the STAR box.

STAR Team members should learn as much as possible about prolific offenders, TOP 5, the Target of the Month, (both inside and outside the STAR box, with particular emphasis inside the STAR box) to include their acquaintances, vehicles owned/used, locations frequented, previous M.O. for offenses, etc. Knowledge and understanding of these issues will drive strategies and all activities. There are several ways to obtain this crucial information:

- Review and engage ILP's weekly "Actionable Intelligence" document to understand the issues in our district, with particular emphasis and examination of the Big 4 crimes inside the STAR box. Big 4 crime trends occurring outside the STAR box should also be examined thoroughly.
- Learn and regularly use the Crimereports.com website to assess real time stats regarding STAR Box criminal activity and district wide crime trends.
- Engage ACE, Platoon Commanders, Sergeants, community leaders and others to gain a better understand of the issues within the STAR box.

STAR Team members will use the above noted resources to regularly identify potential prolific offenders that our members need to target. STAR Team members will forward this information up the chain with an explanation as to why the person(s) should be targeted. These individuals will be further vetted by ILP prior to being added to the target list (TOP 5 or Target of the Month).

As STAR Team members examine crime trends, it is important to ask strategic questions to help truly understand the crime problem and the best possible solutions to the problem. STAR Team members should ask:

- "Why is it happening here and not somewhere else?"
- "How long has it been happening and why did it start?"
- "Will the problem recur or return once law enforcement leaves?"

When conducting an analysis, it is essential to clearly and concisely communicate your efforts to other stakeholders to avoid unnecessary duplication of efforts.

Effective Communication

Inter-agency and intra-agency communication is a crucial component of the Pasco Sheriff's Office ILP Model. The elimination of "information silos" is an important first step.

"Information silo" is a term that refers to people or groups who are incapable of sharing important information. Information silos are counter-productive to ILP and in stark contrast to our operational approach of "We fight as one."

Therefore, it is incumbent for STAR Team members to make a concerted effort to share information regularly with members of other units as part of a formal and informal process. This sharing, at a minimum, should include informative emails to ILP, ACE, PCU, School Resource

Officers and Platoon Commanders to encourage partnership and avoid unnecessary duplication of efforts.

Effective Communication with ILP Analysts

This issue is of such extreme importance that it deserves special emphasis. The Pasco Sheriff's Office Criminal Intelligence Analysts are tasked with gathering, analyzing, and interpreting data from a wide array of internal and external sources to create tactical, strategic and operational intelligence products that meet both current and long term planning needs.

Districts will always have at least one criminal intelligence analyst assigned to assist in crime fighting efforts. STAR Team members are encouraged to communicate, share pertinent information and develop a dialogue directly with our criminal intelligence analyst to gain and provide situational awareness for the STAR area and/or emerging crime trend(s).

Attendance at AIM (Actionable Intelligence Meetings)

STAR Team members will attend and actively participate in weekly Actionable Intelligence Meetings. The weekly AIM is comprised of at least one representative from every section in the agency. This is by design and is intended to include areas that might not appear (on the surface) to have a role in such a meeting. This includes Court Services, Court Process, Child Protective Investigations, Forensics and School Resource.

These areas can contribute a wealth of valuable information generated from their unique area of operation. Department of Juvenile Justice, Probation and Parole, other state agencies, and law enforcement agencies within and surrounding Pasco County will also be encouraged to attend.

The focus of AIM is on hot spots, trends, prolific offenders, and information sharing. It also serves as de-confliction between units who unknowingly may be working the same target. Each meeting is based on crimes affecting our district.

The intelligence analysts will begin each meeting with offender and trend data for the area in question. Attendees weigh in on the information presented. While this meeting is moderated by a supervisor, it is not a roll call style meeting. It is intended to provide a free flow of information.

In addition to the inherent information sharing, the meetings also serve to eliminate the aforementioned "information silos." With obvious exceptions, all units are required to share the persons and areas of focus to allow for a holistic approach to solving their problems. In other words, we seek to integrate an "all crimes" approach to every case. For example, rather than working a drug dealer for drugs only, we would seek to integrate Economic Crimes, Property Crimes and Major Crimes, when possible, to explore other crimes that may be related to the suspect's drug involvement.

AIM Expectations

STAR Team members should prepare to share and seek information related to their mission, goals and objectives. This includes information related to criminal activity within the STAR

Box, identification of prolific offenders, identification of crime trends, TOP 5, Target of the Month and pending investigations and/or persons of interest.

Strategic Partnerships

STAR Team members will be expected to attend select community meetings in the STAR box and participate in select meetings with other PSO members and outside agency members to nurture strategic relationships. STAR Team members must understand that these strategic relationships will greatly enhance their ability to accomplish their mission. These outside agencies include, but are not limited to, the following:

- Municipal Law enforcement agencies inside and adjacent to Pasco County.
- Area Sheriff's Offices
- Parole and Probation
- Juvenile Justice (Probation)
- Code Enforcement
- ATF (gun related charges), ICE and other federal agencies
- Alcohol, Beverage and Tobacco
- HOA and other community organizations (in and related to the STAR Box)
- County Attorney
- Building Officials

STAR Team members must explore how these strategic relationships can enhance their crime fighting efforts. For instance, Parole and Probation has the ability to control the actions of prolific offenders under their supervision. Therefore, STAR Team members should regularly consult and plan missions related to probation checks for individuals who reside inside the STAR box. Special attention must be given to foster this relationship.

Strategic Practices

Star Team members can and will be creative and flexible in their strategic activities. In addition to what has already been described, the STAR Team will utilize various strategies to accomplish their mission and objectives. This includes, but is not limited to, the following activities:

- Strategic, directed patrol in the STAR box in a marked unit. Traffic stops and citizen contacts should be driven by a desire to prevent crime, reduce the public's fear of crime and solving crime, with particular emphasis on the Big 4.
- Strategic directed patrol and surveillance in unmarked units. Traffic stops and citizen contacts should be driven by a desire to prevent crime, reduce the public's fear of crime and solve crime, with particular emphasis on the Big 4.
- Targeted knock and talks (with emphasis on-identifying and targeting Big 4 offenders, even if the location is narcotics related).
- Request a list of recent Big 4 cases in the STAR box that have been recently inactivated. Review cases and consider strategies to develop leads. This will likely include enhanced neighborhood checks. Pathways to and from the incident location should be thoroughly examined for surveillance cameras and other leads that may have been overlooked during the initial LEO response.

- Regularly obtaining lists of active JPOs in and around the STAR box (priority given to Big 4 offenders). Serve the JPOs and plan sweeps when appropriate.
- Regularly searching for and executing warrants in and around the STAR box (priority given to Big 4 offenders).
- STAR Team members have flexibility in regards to vehicles used, uniforms worn (PSO related or dressed down, when appropriate) and resources needed. Be creative as you pursue effectiveness. Some of your strategies will involve trial and error, which is acceptable and expected.
- Consider utilizing strategies that involve resources that are not readily available. We can explore ways to obtain and/or borrow needed resources, if necessary. For instance, if we are having problems with vehicle thefts, consider taking steps to find and utilize a bait car with a kill switch.
- Check BWI and research top pawners. Many of these people live in the STAR Box and are solid targets. Top pawners who live outside the STAR Box can be documented in an ILP tip for follow up by ACE or others.
- Identify adults on probation in the STAR box (with particular emphasis on Big 4 offenders). Conduct probation checks (in cooperation with Parole and Probation) to ensure compliance and strict accountability.
- Identify juveniles on probation in the STAR box (with particular emphasis on Big 4 offenders). Conduct probation checks (in cooperation with JPOs) to ensure compliance and strict accountability.
- STAR Team members should consider using strategic trash pulls on narcotics related residences located in the STAR box. The emphasis should always be to use our response to narcotics and other criminal activity with a clear motivation and focus on obtaining BIG 4 information as we address the other issues.
- Utilize County Ordinance citations as a strategic tool to target prolific offenders and problem locations within the STAR box. Coordinate missions with Cpl. Art Madden and Code Enforcement to conduct STAR box Code Enforcement blitzes.
- Explore utilizing Nuisance Abatement and Minimal Housing standards to target prolific offenders and problem locations within the STAR box. This will require active cooperation with the County Attorney and Building Officials.

Again, the examples listed above have been provided to model practical strategies that show how the principles explained in this document can be put into practice. Over time, we will add to this list as we explore and discover effective crime fighting strategies.

Crime Prevention

A key component of ILP is our agency's effort to reduce and prevent crime from occurring. An important aspect of preventing crime is to provide information to citizens and businesses through a variety of means to create awareness. The goal is to cause self-induced behavior modification to make them less likely to become victims of crime, thus effectively reducing incidents of crime.

Law enforcement agencies have long known the benefits of keeping the public informed about the state of crime in their community, and what LEOs are doing about it. This has historically been conducted via face-to-face meetings with individual citizens or citizen groups.

Modern technology has also increased the capabilities available to law enforcement agencies to educate the public about crime prevention. STAR Team members should consider various ways to disseminate crime prevention information with the goal of creating citizen awareness via the following techniques:

- Online resources such as websites, email distribution groups, social media accounts such as PSO Facebook, PSO Twitter, PSO Pinterest, PSO Instagram and PSO YouTube; PSO cell phone apps., etc.
- Handouts, flyers, door hangers, etc.
- Publicity campaigns such as “Keep What’s Yours”, Shoplifting PSAs, Don’t Drink and Drive.

Crime Prevention Strategies

Identifying crime patterns and working to disrupt those patterns through public awareness efforts can occur in many forms. As STAR Team members make contact with citizens and community leaders in the STAR box, they must learn and participate in crime prevention strategies. STAR Team members must understand and take an active role in using crime prevention principles to educate citizens and businesses on how to avoid being a crime target.

Among other benchmarks already listed, the STAR Team’s effectiveness will be measured by their engagement in effective crime prevention strategies.

During citizen contacts, community meetings and enhanced neighborhood checks, STAR Team members will utilize crime prevention methods to inform residents of emerging crime trends in their area. STAR Team members will offer tips to these citizens on how they can avoid being victimized (i.e. locking vehicle and home doors, closing unattended garage doors, installing motion lights, installing surveillance cameras, encourage citizens to park in their driveway close to the home, encouraging proper landscape maintenance to discourage concealment opportunities, etc.).

To assist in implementing effective crime prevention strategies, consider the following:

- Examine criminal trends and try to determine what opportunity the criminal is exploiting and plan prevention efforts accordingly. Crime patterns will generally relate to an “offender, place, or victim” problem.
- If it is an offender problem and there are no commonalities among the victims, pursue opportunities to strategically patrol the area during opportune times, visit prolific offenders, etc.
- If it is a place problem, try to identify what about the place is attracting crime and take appropriate measures. For example, if there are numerous foreclosed houses in the area in disrepair, work with Code Enforcement to address. Determine if the crimes are occurring along frequently traveled routes that criminal may use and determine if there are opportunities to alter or impact these paths.

- If it is a victim problem, consider marketing campaigns directed at the residents/businesses outlining what they can do to mitigate their potential for victimization. Examples include flyers (or other crime prevention literature), electronic signage, community meetings, newsletters, etc.
- Always be sure to have a coordinated effort that is approved by your District Commander to guard against duplication of efforts.

Daily Reports

The STAR Team Corporal (or designee) will provide the Property Crimes Sergeant, District Investigative Lieutenant, and Captain with a daily email documenting the STAR Team's activity for the day. This report is not intended to simply document arrests or other law enforcement activity. Although this activity is important and should be documented, the reason behind the activity should also be included. In summary, this report should be written in a way that clearly reveals the STAR Team's activity is based upon the principles contained in this manual. This report will be also added to morning report at the conclusion of every shift.

Exhibit L

--- STAT DATA ---
Narrative Only

VICTIM/WITNESS - DOMESTIC VIOLENCE PACKET ISSUED Y/N: No
SAO INVESTIGATION DATE: N
SUPPORT DOCUMENTS: None

On 06-16-12, at 1716 hours, I was on duty working the 0600 hour, to 1800 hour, shift as a Duly Sworn Deputy for Pasco County.

While on patrol, I received a phone call from the listed suspect in this case. Joseph advised me he was involved in a verbal confrontation with a subject named Jerry, at Jerry's Auto Sales. Joseph said he attempted to call me immediately upon leaving the incident location, however, I was not available. He said he continued to try to contact me, which was confirmed by missed calls recorded on my phone from 1445 hours on 06-16-12. Joseph gave me a

detailed statement regarding the incident. He said he met with Jerry to inquire about a problem he had with a vehicle that was purchased from his business one year prior. Joseph said he asked Jerry if he sold the vehicle a year ago without the check engine light. Joseph said Jerry became extremely irate regarding the question. Jerry then began to yell and immediately made a call on his phone and began yelling into the phone, "There is a man on my property attacking me and he won't leave." Joseph said he was standing approximately two feet from Jerry while he was on the phone, however, Jerry continued to talk into the phone saying, "He is in my face, he won't leave, he struck me in the chest, etc." Joseph said at no time did he touch Jerry, not even to push him away when he tried to provoke him.

Joseph then entered his vehicle and Jerry followed him, continuing to yell he was being attacked. Joseph said Jerry walked behind his vehicle and positioned himself at the right rear corner of the vehicle. Joseph said there was a vehicle directly in front of his preventing him from going forward and Jerry was still in his path behind him. Joseph said Jerry remained at the corner of the vehicle for 10 or 15 seconds before he moved to his right. Joseph said he was looking to the rear and when Jerry cleared his path, he put the vehicle in reverse and very slowly, started to back up. Joseph emphasized the fact he backed up less than a foot, when Jerry slammed his forearms and chest onto the rear window. Joseph said he immediately put the vehicle in park. Joseph said Jerry did not fall backwards, as he would if he hit Jerry with a vehicle, but rather turned around and walked approximately five to ten feet to the right of the car and dove belly down into the gravel driveway. Joseph said he exited his vehicle as he lost sight of Jerry when Jerry dove down. Joseph said he walked around the back of his vehicle and observed Jerry to be seated on the ground screaming into his phone that he never dropped, saying, "He just hit me with his car." Joseph said Jerry then began to pick at both of his knees with his fingernails. Jerry then started to yell to a man that was standing on the porch of a gift shop saying, "Did you see him hit me?" Joseph said the man answered Jerry saying, "No, I just came out." Joseph said Jerry then came back to the rear of the vehicle and continued to scream into his phone, "He is in my face." Jerry then turned towards Joseph and started to push him and punch him on his back and shoulders. Joseph said a vehicle pulled into the gift shop occupied by two females. At that time Jerry backed up away from the vehicle. Joseph entered his vehicle and could see Jerry was standing far enough away to allow him to back up enough to clear the vehicle in front of his and pull forward. Joseph said he then left the property and immediately called my phone. Joseph continued to emphasize he was very cautious to never touch Jerry at any time, saying he did not even block Jerry when he was hitting him. Joseph told me his 12 year old daughter, 9 year old son and 7 year old daughter, were in the vehicle during the incident.

I spoke to the 12 year old, Charis, on the phone. Charis was

very clear regarding what she had seen. Charis said a man was yelling at her dad and was pushing him. Charis said that man was yelling on his phone, but she could not hear what he was saying. Charis said her dad got back into their car and started to back up. She said her dad was just starting to move and was moving very slowly backwards, when the man ran into the back of the car and smacked it. She said the man then walked off to the side and jumped on the ground. Charis continued to say her dad exited the car to see where the man was. She then observed the man approach her dad and push him. Charis said the man pushed him several times, until her dad entered the car. She said the man stood off to the left side of the car and continued to yell. The man then walked back behind the car and stood over by the passenger side of the car. She said her dad backed up very slowly, just enough to allow enough room for him to pull forward and leave. I asked Charis specifically saying, "Did your dad touch the man or push him, just to keep him away or anything?" Charis said, "My daddy never touched the man, even when the man was hitting and pushing him." I asked Charis, "Did your daddy bump into the man by accident when he was trying to leave?" Charis said, "My daddy was just starting to barely move, when the man ran into the car, smashing himself into it."

I told Joseph I was not working in the district this incident occurred and I could not get involved directly in the investigation. I advised Joseph he and Charis need to tell the investigating deputy about all the details. I told him to mention pulling the 911 tape so the deputy could hear the man alleging that you were hitting him. The fact that the man continued to talk to the operator without interruption while being allegedly punched and attacked will be inconsistent.

I then called the investigating deputy and advised him Joseph called me immediately to report the incident. Deputy J. Cardona advised he would interview Joseph and his witnesses the next day.

ICR = .50 hour/s @ \$26.00 per hour = \$13.00.

Station 5 / 1712

Administrative		
Reporting Member - JOHN HORNING	CJIS#: 566	Reporting Date: 06/22/12
Supervisor: JOHN COLLIER JR	CJIS#: 1620	Date approved: 06/25/12
Status: CLEARED BY ARREST		
Referred to: S.A.O. EAST		
Assignment		
Assigned By:	CJIS#:	Date assigned:
Assigned To:	CJIS#:	Date assigned:
End Report 12 - 033038		

Exhibit M

Select Language ▼

Powered by Google Translate

Candidate: Chris Nocco

Office: Sheriff

Report Date: M1 (1/1/2016 - 1/31/2016)**Campaign Treasurer's Report – Itemized Contributions**

Seq#	Contributor	Entity	Occupation	Cont. Type	Amount
Date			Amend		
#1 1/10/2016	James Mallo ***Protected***	Individual	law enforcement	Check	\$1,000.00
#2 1/11/2016	Stephen Hartnett 1810 Stetson Drive Clearwater, FL 337650000	Individual	law enforcement	Check	\$1,000.00
#3 1/11/2016	Kathleen Hartnett 1810 Stetson Drive Clearwater, FL 337650000	Individual	office manager	Check	\$1,000.00
#4 1/11/2016	Michael Jenkins Sr. 4351 Evans Avenue New Port Richey, FL 346520000	Individual	law enforcement	Check	\$1,000.00
#5 1/11/2016	Angela Jenkins 4351 Evans Avenue New Port Richey, FL 346520000	Individual	homemaker	Check	\$1,000.00
#6 1/11/2016	Renee Harrington 4354 Craigdarragh Avenue Spring Hill, FL 346060000	Individual	teacher	Check	\$1,000.00
#7 1/11/2016	Jeffrey Harrington 4354 Craigdarragh Avenue Spring Hill, FL 346060000	Individual	law enforcement	Check	\$1,000.00

#8	Jack Armstrong	Individual	retired	Check	
1/11/2016	P. O. Box 5273 Hudson, FL 346740000				\$1,000.00
#9	John Kinsman	Individual	electricalcontractor	Check	
1/11/2016	36131 Chancey Road Zephyrhills, FL 335410000				\$250.00
#10	Teresa Kinsman	Individual		Check	
1/11/2016	36131 Chancey Road Zephyrhills, FL 335410000				\$100.00
#11	Kenneth Gregory	Individual	law enforcement	Check	
1/11/2016	11429 Pennsville Court New Port Richey, FL 346540000				\$1,000.00
#12	Susan Gregory	Individual	office manager	Check	
1/11/2016	11429 Pennsville Court New Port Richey, FL 346540000				\$1,000.00
#13	Kevin Ryman	Individual	contractor	Check	
1/11/2016	11248 Mansker Drive Dade City, FL 335250000				\$500.00
#14	Melbourne Eakley	Individual	law enforcement	Check	
1/11/2016	***Protected***				\$1,000.00
#15	Lori Eakley	Individual	office manager	Check	
1/11/2016	***Protected***				\$1,000.00
#16	Laura Mallo	Individual	teacher	Check	
1/11/2016	***Protected***				\$1,000.00
#17	Eric Seltzer	Individual	law enforcement	Check	
1/11/2016	***Protected***				\$1,000.00
#18	Kerisma Seltzer	Individual	nurse	Check	
1/11/2016	***Protected***				\$1,000.00

#19	Martin Electric, Inc.	Business	electrical svcs.	Check	
1/11/2016	14827 10th Street Dade City, FL 335230000				\$250.00
#20	Pasco Turf and Tractor, LLC	Business	agriculture equip. s	Check	
1/11/2016	5117 Gall Blvd. Zephyrhills, FL 335420000				\$500.00
#21	Bahr 's Aluminum, Inc.	Business	aluminumsupplier	Check	
1/11/2016	6440 Fort King Road Zephyrhills, FL 335420000				\$500.00
#22	Sun State Aluminum, Inc.	Business	aluminum supplier	Check	
1/11/2016	6154 Fort King Road Zephyrhills, FL 335420000				\$500.00
#23	Bahr 's Propane Gas & Air Cond	Business	propane/airconditio	Check	
1/11/2016	4441 Allen Road Zephyrhills, FL 335410000				\$500.00
#24	Proly, Laporte & Mulligan, P.A	Business	law firm	Check	
1/11/2016	11914 Oak Trail Way Port Richey, FL 346680000				\$1,000.00
#25	Congress Street Properties, In	Business	funeral svcs.	Check	
1/11/2016	6616 Congress Street New Port Richey, FL 346530000				\$500.00
#26	Thomas B. Dobies Funeral Home,	Business	funeral svcs.	Check	
1/11/2016	4910 Bartelt Road Holiday, FL 346900000				\$500.00
#27	Tarpon Chapel, Inc.	Business	funeral svcs.	Check	
1/11/2016	701 East Tarpon Avenue Tarpon Springs, FL 346890000				\$500.00

#28	Hudson Chapel Crematory, Inc.	Business	funeral svcs.	Check	
1/11/2016	9944 Hudson Avenue Hudson, FL 346690000				\$500.00
#29	Seven Springs/Trinity Chapel,	Business	funeral svcs.	Check	
1/11/2016	8825 Old County Road 54 New Port Richey, FL 346530000				\$500.00
#30	Melton Godwin	Individual	retired	Check	
1/15/2016	P. O. Box 296 Land O' Lakes, FL 346390000				\$250.00
#31	Audra Godwin	Individual	office clerk	Check	
1/15/2016	P. O. Box 296 Land O' Lakes, FL 346390000				\$250.00
#32	John Corbin	Individual	law enforcement	Check	
1/14/2016	16927 Crawley Road Odessa, FL 335560000				\$1,000.00
#33	Jacqueline Corbin	Individual	teacher	Check	
1/14/2016	16927 Crawley Road Odessa, FL 335560000				\$1,000.00
#34	Flooring The Ez Way, LLC	Business	construction	Check	
1/14/2016	2310-C Success Drive Odessa, FL 335560000				\$1,000.00
#35	Yeager & Company, Inc.	Business	construction	Check	
1/14/2016	P. O. Box 1011 Odessa, FL 335560000				\$1,000.00
#36	Bob Formoso	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$20.00

#37	John Sharpe	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#38	Mark Celeste	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#39	Michael Pulaski	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#40	Joseph Marcado	Individual	Cash	
1/20/2016	12420 Tawny Court New Port Richey, FL 346540000			\$40.00
#41	Mark Mitchell	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#42	Dan Prybyzerski	Individual	Cash	
1/20/2016	8371 Gallup Road Spring Hill, FL 346080000			\$40.00
#43	Debbie Vostello	Individual	Cash	
1/20/2016	***Protected***			\$20.00
#44	Stephen Smith	Individual	Cash	
1/20/2016	9930 Land O' Lakes Blvd. Land O' Lakes, FL 346380000			\$40.00
#45	Jeanne Sleeper	Individual	Cash	
1/20/2016	11601 Smith Blvd. Hudson, FL 346670000			\$20.00
#46	Kyle Bowman	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$50.00
#47	Davin Laporte	Individual	Cash	
1/20/2016	11444 Dorian Court New Port Richey, FL 346540000			\$10.00

#48	Gabriel Montalvo	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#49	Garyn I. Angel	Individual	Cash	
1/20/2016	8010 Brighton Drive Port Richey, FL 346680000			\$20.00
#50	Michael Segman	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$40.00
#51	Chris LaBruzzo	Individual	Cash	
1/20/2016	11510 Splendid Lane Tampa, FL 336260000			\$20.00
#52	Steve Napoleon	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#53	William Hall	Individual	Cash	
1/20/2016	2262 U.S. Highway 19 Holiday, FL 346910000			\$20.00
#54	John Mills	Individual	Cash	
1/20/2016	10741 Northridge Court Trinity, FL 346550000			\$20.00
#55	Matthew Myers	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#56	Ken Kilian	Individual	Cash	
1/20/2016	***Protected***			\$20.00
#57	Rodger Turnbow	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$40.00
#58	Sean Sweengy	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00

#59	David Rodriguez	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#60	John Perez	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#61	Joe Russo	Individual	Cash	
1/20/2016	1704 Johnston Avenue Tampa, FL 336030000			\$20.00
#62	Andrea Esposto	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#63	Jeannie Kunel	Individual	Cash	
1/20/2016	5507 Richey Drive New Port Richey, FL 346520000			\$25.00
#64	Anastasios Handrinos	Individual	Cash	
1/20/2016	9427 Morehead Lane Port Richey, FL 346680000			\$20.00
#65	Eric Anderson	Individual	Cash	
1/20/2016	11407 Challenger Avenue, #2 Odessa, FL 335560000			\$20.00
#66	Jessica Hammond	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#67	Bill Lawless	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#68	James Steffens	Individual	lawenforcement	Check
1/19/2016	***Protected***			\$1,000.00

#69	The Law Offices of Lucas Magaz	Business	law firm	Check	
1/19/2016	8606 Government Drive New Port Richey, FL 346540000				\$500.00
#70	Roy Thornton	Individual		Check	
1/19/2016	30907 Middle Lake Drive Dade City, FL 335230000				\$100.00
#71	Andrew Kelleher	Individual		Cash	
1/20/2016	7911 Landsdowne Lane New Port Richey, FL 346540000				\$20.00
#72	Jacob Seemann	Individual		Cash	
1/20/2016	***Protected***				\$20.00
#73	Joanne Surmin	Individual		Cash	
1/20/2016	5633 Old Post Road Port Richey, FL 346680000				\$20.00
#74	Brooke Peterson	Individual		Cash	
1/20/2016	7911 Woburn Street New Port Richey, FL 346530000				\$20.00
#75	Michael Garteneerg	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$40.00
#76	Aaron Palster	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$20.00
#77	Jordan Trowell	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$20.00
#78	Robert Hale	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$40.00

#79	Bob Grady	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$40.00
#80	Susan Brookes	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#81	Robert Gartenberg	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$40.00
#82	Kim Johnson	Individual	Cash	
1/20/2016	6929 Morningside Court New Port Richey, FL 346550000			\$20.00
#83	Steve Schurdell	Individual	Cash	
1/20/2016	4003 Rudder Way New Port Richey, FL 346520000			\$20.00
#84	Peter Vavoulis	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#85	Kim Thompson	Individual	Cash	
1/20/2016	4605 Steel Dust Lane Lutz, FL 335590000			\$20.00
#86	Monte Designs, LLC	Business	Check	
1/20/2016	18134 Applejack Court Spring Hill, FL 346100000			\$100.00
#87	Anthony Sleeper	Individual	Cash	
1/20/2016	11601 Smith Blvd. Hudson, FL 346670000			\$20.00
#88	Monte Designs, LLC	Business	Check	
1/20/2016	18134 Applejack Court Spring Hill, FL 346100000			\$40.00
#89	Steve Dison	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00

#90	Kelly Herman	Individual	Cash	
1/20/2016	7911 Woburn Street New Port Richey, FL 346530000			\$20.00
#91	Milton Arroyo	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#92	Bill Declemark	Individual	Cash	
1/20/2016	P. O. Box 544 New Port Richey, FL 346560000			\$20.00
#93	Matt Murphy	Individual	Cash	
1/20/2016	5706 Riverview Drive New Port Richey, FL 346520000			\$20.00
#94	Troy Ferguson	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#95	Rio Salons & Spas, Inc.	Business	Check	
1/20/2016	9113 Little Road New Port Richey, FL 346540000			\$40.00
#96	Brad Drake	Individual	Cash	
1/20/2016	***Protected***			\$20.00
#97	Bill Bunting	Individual	Cash	
1/20/2016	5507 El Cerro Drive New Port Richey, FL 346550000			\$20.00
#98	Micro Solutions	Business	informationtechnology	Check
1/20/2016	9416 State Road 52 Hudson, FL 346690000			\$250.00
#99	Jonathan McGuffin	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#100	Joshua Small	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00

#101	Robin Lupole	Individual		Cash	
1/20/2016	7521 Tanglewood Drive New Port Richey, FL 346540000				\$20.00
#102	McMenamin Law	Business		Check	
1/20/2016	Group, P.A. 1324 Seven Springs Blvd., #157 Trinity, FL 346550000				\$20.00
#103	Frank Laton	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$20.00
#104	Kip Mello	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$20.00
#105	Danny Hayes	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$20.00
#106	Samantha Couture	Individual		Cash	
1/20/2016	7010 Hirsch Drive, #108 Trinity, FL 346550000				\$20.00
#107	Ba Da Boom	Business	fireworks retailer	Check	
1/20/2016	Fireworks 9416 State Road 52 Hudson, FL 346690000				\$250.00
#108	Bryan Sarabia	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$20.00
#109	Stathopoulos Law	Business	law firm	Check	
1/20/2016	Group, P.A. 39042 US Highway 19, N. Tarpon Springs, FL 346890000				\$1,000.00

#110	John Hughes 9016 Syaloford, 1/20/2016 #202 Port Richey, FL 346680000	Individual		Cash	\$40.00
#111	Law Offices of Carlson and Mei 1/20/2016 250 N. Belcher Road, #102 Clearwater, FL 337560000	Business	law firm	Check	\$200.00
#112	Jessie Cloker 1/20/2016 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$40.00
#113	Mike Jones Sr. 1/20/2016 10038 State Road 52 Hudson, FL 346690000	Individual		Cash	\$20.00
#114	Scott Evans 1/20/2016 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$20.00
#115	Brian Kuzera 1/20/2016 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$20.00
#116	William Davis 1/20/2016 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$40.00
#117	Jerry Brown 1/20/2016 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$40.00
#118	Karen E. Lueders 1/20/2016 16824 Midsummer Lane Spring Hill, FL 346100000	Individual		Cash	\$20.00
#119	Dan Olds 1/20/2016 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$20.00

#120	David Pugh	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#121	L&S Custom	Business	automobile svcs.	Check
1/20/2016	Coaches, Inc. 9324 Eden Avenue Hudson, FL 346670000			\$1,000.00
#122	Jenn Christensen	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#123	Leslie O'Conner	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#124	Cliff Williams	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#125	Joe Nieves	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#126	R. Scott Andringa	Individual	Cash	
1/20/2016	3316 San Domingo Street Clearwater, FL 337590000			\$20.00
#127	Jessica Porter	Individual	Cash	
1/20/2016	3316 San Domingo Street Clearwater, FL 337590000			\$20.00
#128	Dustin Roy	Individual	Cash	
1/20/2016	18346 Sand Pine Drive Spring Hill, FL 346100000			\$20.00
#129	Richard Sliz	Individual	Cash	
1/20/2016	13448 State Road 52 Hudson, FL 346690000			\$20.00

#130	Juan Rivera	Individual	Cash	
1/20/2016	P. O. Box 112 Odessa, FL 335560000			\$20.00
#131	Eli Sherman	Individual	Cash	
1/20/2016	8600 Ten Bridge Way New Port Richey, FL 346540000			\$20.00
#132	Joseph Irizarry	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$40.00
#133	Alan Berbench	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$50.00
#134	Jay Galassi	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$50.00
#135	Matt Kenly	Individual	Cash	
1/20/2016	4840 Zodiac Avenue Holiday, FL 346900000			\$40.00
#136	Joaann Daniels	Individual	Cash	
1/20/2016	P. O. Box 2315 Land O' Lakes, FL 346390000			\$20.00
#137	Nikki Sowles	Individual	Cash	
1/20/2016	7826 Blue Spring Drive Land O' Lakes, FL 346370000			\$20.00
#138	Francisco Mendez	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$20.00
#139	Jamie Sessa	Individual	Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000			\$50.00
#140	Roche Surety, Inc.	Business	insurance	Check
1/20/2016	4107 N. Himes Avenue, #FL2 Tampa, FL 336070000			\$500.00

#141	Roche Surety, Inc. 4107 N. Himes Avenue, #FL2 Tampa, FL 336070000	Business	insurance	Check	\$500.00
1/20/2016					
#142	G. Cucchiara 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$40.00
1/20/2016					
#143	Oreilly Capital Management, LL 1740 Cameron Court Trinity, FL 346550000	Business	financial services	Check	\$150.00
1/20/2016					
#144	Chris Cooley 10716 Rain Lilly Pass Land O' Lakes, FL 346380000	Individual		Cash	\$20.00
1/20/2016					
#145	Mike Jones 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$20.00
1/20/2016					
#146	John Thomas 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$40.00
1/20/2016					
#147	Justin Ross 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$20.00
1/20/2016					
#148	Monte Schuler 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$20.00
1/20/2016					
#149	Value Rate Insurance Agency II P. O. Box 340365 Tampa, FL 336940000	Business		Check	\$100.00
1/20/2016					
#150	Dennis Ziegler c/o 8700 Citizens Drive New Port Richey, FL 346540000	Individual		Cash	\$40.00
1/20/2016					

#151	Tim Zurkosky	Individual	Cash
1/20/2016	27045 Coral Springs Drive Wesley Chapel, FL 335440000		\$20.00
#152	Gary Willner	Individual	Cash
1/20/2016	1813 Daylily Drive Trinity, FL 346550000		\$20.00
#153	A. J. Cox	Individual	Cash
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000		\$40.00
#154	Ryan Nye	Individual	Cash
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000		\$20.00
#155	Rick Redman	Individual	Cash
1/20/2016	4031 State Road 52 Bayonet Point, FL 346670000		\$20.00
#156	Dennis Clark	Individual	Cash
1/20/2016	c/o 8700 Citizens Drive New Port Richey, FL 346540000		\$20.00
#157	Richard VanSteen	Individual	Cash
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000		\$20.00
#158	Louis Brothag	Individual	Cash
1/20/2016	8217 Tahr Avenue New Port Richey, FL 346530000		\$40.00
#159	John Dill	Individual	Cash
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000		\$20.00
#160	Kim Riggins	Individual	Cash
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000		\$20.00
#161	Steve Farrell	Individual	Cash
1/20/2016	10930 Earhart Drive New Port Richey, FL 346540000		\$20.00

#162	Karl of Pasco	Business		Check	
1/20/2016	6307 Grand Blvd. New Port Richey, FL 346520000				\$100.00
#163	Randy Schomeman	Individual		Cash	
1/20/2016	13707 Lagoon Drive Hudson, FL 346670000				\$40.00
#164	Skip Schaer	Individual		Cash	
1/20/2016	2715 Hunt Road Land O' Lakes, FL 346380000				\$40.00
#165	Jen Zoccoli	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$40.00
#166	Chris Mettler	Individual		Cash	
1/20/2016	11701 Colony Lakes Blvd. New Port Richey, FL 346540000				\$20.00
#167	Bob Carroll Building	Business	construction	Check	
1/20/2016	Contracto 8535 Formel Avenue Port Richey, FL 346680000				\$250.00
#168	Tim Hennigan	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$20.00
#169	Rich Kiebler	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$40.00
#170	Clearwater Bonding	Business	bail bonds	Check	
1/20/2016	Agency, Inc 5560 Roosevelt Blvd., #4 Clearwater, FL 337600000				\$200.00
#171	Eric Anderson	Individual		Cash	
1/20/2016	11407 Challenger Avenue, #2 Odessa, FL 335560000				\$20.00

#172	William Davis	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$20.00
#173	Christina Le	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$30.00
#174	Puan Tran	Individual		Cash	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$30.00
#175	Central Pasco	Business		Check	
1/20/2016	Veterinary Care 17945 State Road 54 Lutz, FL 335580000				\$100.00
#176	Juan Rivera	Individual		Cash	
1/20/2016	P. O. Box 112 Odessa, FL 335560000				\$20.00
#177	Pasco Bail Agencies, Inc.	Business	bail bonds	Check	
1/20/2016	9907 Land O' Lakes Blvd. Land O' Lakes, FL 346380000				\$1,000.00
#178	Elmes Rivera	Individual		Cash	
1/20/2016	30323 Ingalls Court Wesley Chapel, FL 335430000				\$30.00
#179	Accredited Surety and Casualty	Business	insurance	Check	
1/20/2016	P. O. Box 140855 Orlando, FL 328140000				\$1,000.00
#180	Margie McGrath	Individual		Cash	
1/20/2016	7330 Dogleg Court Port Richey, FL 346680000				\$20.00
#181	Ron Oakley	Individual		Cash	
1/20/2016	13126 U.S. Highway 301 Dade City, FL 335250000				\$30.00

#182	Deidra Oakley 13126 U.S. Highway 301 Dade City, FL 335250000	Individual		Cash	\$25.00
1/20/2016					
#183	Al Estes Bonding Agency 13790 49th Street, N. Clearwater, FL 337620000	Business	bail bonds	Check	\$250.00
1/20/2016					
#184	East Richey Repair 6721 Massachusetts Avenue New Port Richey, FL 346530000	Business		Check	\$100.00
1/20/2016					
#185	Brandy Bail Bonds, Inc 916 S. Andrews Avenue Fort Lauderdale, FL 333160000	Business	bail bonds	Check	\$500.00
1/20/2016					
#186	Michelle R. Spreadbury 8338 Briar Leaf Court Port Richey, FL 346680000	Individual		Check	\$40.00
1/21/2016					
#187	Roy W. Phillips 5760 Colonial Drive New Port Richey, FL 346530000	Individual	sales	Check	\$150.00
1/20/2016					
#188	Roy W. Phillips 5760 Colonial Drive New Port Richey, FL 346530000	Individual		Check	\$100.00
1/20/2016					
#189	Lindsay Moore ***Protected***	Individual	lawenforcement	Check	\$1,000.00
1/20/2016					
#190	Catherine Mansfield 10655 Lakeview Drive New Port Richey, FL 346540000	Individual	lawenforcement	Check	\$500.00
1/20/2016					

#191	Richard Mancuso 7530 Rosewood Drive Port Richey, FL 346680000	Individual		Check	\$25.00
1/20/2016					
#192	Rachael Williamson 13411 Chicago Avenue Hudson, FL 346690000	Individual	lawenforcement	Check	\$1,000.00
1/20/2016					
#193	Raymond O. Williamson 13411 Chicago Avenue Hudson, FL 346690000	Individual	lawenforcement	Check	\$1,000.00
1/20/2016					
#194	Dana Carmack 3838 Spring Valley Drive New Port Richey, FL 346550000	Individual		Check	\$50.00
1/20/2016					
#195	Robert D. Scruggs 2289 Kingfisher Lane Clearwater, FL 337620000	Individual	lawenforcement	Check	\$1,000.00
1/20/2016					
#196	Marilyn Dennison 1028 Hagen Drive Trinity, FL 346550000	Individual	retired	Check	\$1,000.00
1/20/2016					
#197	James L. Driscoll ***Protected***	Individual	retired	Check	\$500.00
1/20/2016					
#198	Louis Rodriguez 15041 Princewood Lane Land O' Lakes, FL 346380000	Individual		Check	\$20.00
1/20/2016					
#199	Sean P. Sweeney 13955 Crater Circle Hudson, FL 346690000	Individual		Check	\$100.00
1/20/2016					

#200	Hugh Townsend 9701 Hermosillo Drive New Port Richey, FL 346550000	Individual		Check	\$20.00
1/20/2016					
#201	Jeff Deremer 11222 Osceola Drive New Port Richey, FL 346540000	Individual		Check	\$60.00
1/20/2016					
#202	Vicki Solkin 2852 Devonoak Blvd. Land O' Lakes, FL 346380000	Individual		Check	\$40.00
1/20/2016					
#203	James M. Gardner 2642 Billingham Drive Land O' Lakes, FL 346390000	Individual		Check	\$40.00
1/20/2016					
#204	Margie A. Tingley P. O. Box 214 San Antonio, FL 335760000	Individual		Check	\$50.00
1/20/2016					
#205	S. K. Rao Musunuru 14100 Fivay Road, #160 Hudson, FL 346670000	Individual	physician	Check	\$500.00
1/20/2016					
#206	Peggy A. Henley ***Protected***	Individual		Check	\$100.00
1/20/2016					
#207	Philip H. Chesnut P. O. Box 2057 New Port Richey, FL 346560000	Individual		Check	\$50.00
1/20/2016					
#208	Andrea Henshilwood 5532 Pilots Place New Port Richey, FL 346520000	Individual	lawenforcement	Check	\$500.00
1/20/2016					
#209	Shelly Gentile 1103 Water Oak Drive Port Richey, FL 346680000	Individual		Check	\$25.00
1/20/2016					

#210 1/20/2016	Mary L. Steffens ***Protected***	Individual	lawenforcement	Check	\$1,000.00
#211 1/20/2016	Chris Beaman ***Protected***	Individual	lawenforcement	Check	\$1,000.00
#212 1/20/2016	Danny Berberich ***Protected***	Individual		Check	\$50.00
#213 1/20/2016	Nicole Beaman ***Protected***	Individual	homemaker	Check	\$1,000.00
#214 1/20/2016	Debby Jenkins ***Protected***	Individual		Check	\$30.00
#215 1/20/2016	Jeffrey M. Peake 17853 Wandy Sue Avenue Hudson, FL 346670000	Individual	lawenforcement	Check	\$1,000.00
#216 1/20/2016	Brett Landsberg 7514 Lotus Drive Port Richey, FL 346680000	Individual	lawenforcement	Check	\$240.00
#217 1/20/2016	Edward Beckman ***Protected***	Individual		Check	\$100.00
#218 1/20/2016	Jeff Lucas 1154 Sedgefield Court Oldsmar, FL 346770000	Individual	attorney	Check	\$500.00
#219 1/20/2016	Stacey Jenkins 20241 Leonard Road Lutz, FL 335580000	Individual	homemaker	Check	\$1,000.00
#220 1/20/2016	Gary R. Amundson 6446 Arbor Drive New Port Richey, FL 346550000	Individual		Check	\$20.00

#221	Norman Jenkins 16419 US Highway 301 Dade City, FL 335230000	Individual	lawenforcement	Check	\$1,000.00
1/20/2016					
#222	Timothy Bullock ***Protected***	Individual		Check	\$100.00
1/20/2016					
#223	Hollace Hawkes ***Protected***	Individual	homemaker	Check	\$1,000.00
1/20/2016					
#224	Jeremiah Hawkes ***Protected***	Individual	lawenforcement	Check	\$1,000.00
1/20/2016					
#225	Andrea Montalvo 20116 Natures Hike Way Tampa, FL 336470000	Individual	homemaker	Check	\$200.00
1/20/2016					
#226	Chase Daniels 3306 N.E. 30th Court Ocala, FL 344790000	Individual	lawenforcement	Check	\$1,000.00
1/20/2016					
#227	James L. Driscoll ***Protected***	Individual		Check	\$20.00
1/20/2016					
#228	Rosalie Driscoll ***Protected***	Individual		Check	\$20.00
1/20/2016					
#229	Theodore Durling 7646 Tanglewood Drive New Port Richey, FL 346540000	Individual		Check	\$50.00
1/20/2016					
#230	Kimberly Lavandera 7408 Miracle Lane Odessa, FL 335560000	Individual	registered nurse	Check	\$250.00
1/25/2016					
#231	Robert T. Rossi 1045 Pomme De Pin Lane New Port Richey, FL 346550000	Individual		Check	\$100.00
1/25/2016					

#232	Thomas R. West	Individual		Check	
1/25/2016	10446 Pontofino Circle Trinity, FL 346550000				\$100.00
#233	Richard S. Ackley	Individual		Check	
1/25/2016	7723 Arelli Drive Trinity, FL 346550000				\$100.00
#234	Joanne Pino	Individual	realtor	Check	
1/25/2016	4924 Southshore Drive New Port Richey, FL 346520000				\$250.00
#235	C. Shayne George	Individual	hospital admin.	Check	
1/25/2016	1825 Champions Circle Evans, GA 308090000				\$250.00
#236	Lorraine Lane	Individual		Check	
1/25/2016	13713 Rosette Road Hudson, FL 346690000				\$50.00
#237	Shalin N. Shah	Individual		Check	
1/25/2016	18919 Saint Laurent Drive Lutz, FL 335580000				\$100.00
#238	Curtis M. Crider	Individual	attorney	Check	
1/25/2016	2976 Northfield Drive Tarpon Springs, FL 346880000				\$500.00
#239	Stephanie Short	Individual	homemaker	Check	
1/25/2016	2280 Restmere Lane Spring Hill, FL 346090000				\$500.00
#240	Jody Gatti	Individual	property management	Check	
1/25/2016	6444 Summerfield Loop New Port Richey, FL 346550000				\$500.00
#241	Kevin R. Holecko	Individual	retired	Check	
1/25/2016	10508 Pontofino Circle Trinity, FL 346550000				\$500.00

#242	Christine E. Davis	Individual	health care	Check	
1/25/2016	***Protected***				\$500.00
#243	Community Management Services, 5837 Trouble Creek Road New Port Richey, FL 346520000	Business	community mgmt.	Check	
1/25/2016					\$500.00
#244	Heather R. Stathopoulos 2693 Westchester Drive, N. Clearwater, FL 337610000	Individual	attorney	Check	
1/25/2016					\$1,000.00
#245	Tom Stathopoulos 2693 Westchester Drive, N. Clearwater, FL 337610000	Individual	attorney	Check	
1/25/2016					\$1,000.00
#246	Harry L. Halladay 18509 Council Crest Drive Odessa, FL 335560000	Individual	baseball player	Check	
1/25/2016					\$1,000.00
#247	Brandy Halladay 18509 Council Crest Drive Odessa, FL 335560000	Individual	homemaker	Check	
1/25/2016					\$1,000.00
#248	Spithas, LLLP 2115 Alexis Court Tarpon Springs, FL 346890000	Business	investment partnersh	Check	
1/25/2016					\$1,000.00
#249	Koronis Enterprises, Ltd. LLP 2115 Alexis Court Tarpon Springs, FL 346890000	Business	health care	Check	
1/25/2016					\$1,000.00
#250	Neurosurgical Spine Center, In P. O. Box 5849 Hudson, FL 346740000	Business	health care	Check	
1/25/2016					\$1,000.00

#251	Kilada Corporation	Business	health care	Check	
1/25/2016	2115 Alexis Court Tarpon Springs, FL 346890000				\$1,000.00
#252	George Giannakopoulos	Individual	physician	Check	
1/25/2016	2115 Alexis Court Tarpon Springs, FL 346890000				\$1,000.00
#253	Emilia Giannakopoulos	Individual	mechanical engineer	Check	
1/25/2016	2115 Alexis Court Tarpon Springs, FL 346890000				\$1,000.00
#254	Demetre Loulourgias	Individual	engineer	Check	
1/25/2016	232 Howard Drive Belleair Beach, FL 337860000				\$1,000.00
#255	Danny's Bar and Grill	Business		Check	
1/25/2016	3105 Grand Blvd. Holiday, FL 346900000				\$100.00
#256	BNS Enterprises, Inc.	Business	technology support	Check	
1/25/2016	7334 Jennifer Street Port Richey, FL 346680000				\$150.00
#257	Law Offices of Carlson and Mei	Business	law firm	Check	
1/25/2016	250 N. Belcher Road, #102 Clearwater, FL 337560000				\$200.00
#258	Law Office of Keough	Individual		Check	
1/25/2016	7239 Little Road New Port Richey, FL 346540000				\$100.00
#259	Greek Boys Choice Foods, Inc.	Business	food distribution	Check	
1/25/2016	744 Anclote Road Tarpon Springs, FL 346890000				\$500.00

#260	Polakoff Bail Bonds, Inc.	Business	bail bonds	Check	
1/25/2016	3708 S. John Young Parkway, #A Orlando, FL 328390000				\$500.00
#261	Farhan Siddiqi, M.D., P.A.	Business	medical center	Check	
1/25/2016	2040 Short Avenue Odessa, FL 335560000				\$500.00
#262	Management and Associates	Business	comm. assoc. mgmt.	Check	
1/25/2016	720 Brooker Creek Blvd., #206 Oldsmar, FL 346770000				\$1,000.00
#263	Barbera H. Ryals	Individual	real estate broker	Check	
1/28/2016	P. O. Box 320334 Tampa, FL 336790000				\$1,000.00
#264	Nancy H. Mynard	Individual	homemaker	Check	
1/28/2016	1208 Druid Lane Tampa, FL 336290000				\$1,000.00
#265	Law Offices of Joseph A. Pobli	Business	law firm	Check	
1/28/2016	9916 Preakness Stakes Way Dade City, FL 335250000				\$250.00
#266	Hernando Pasco	Business	medical center	Check	
1/28/2016	Primary Care, L 11373 Cortez Blvd. Brooksville, FL 346130000				\$250.00
#267	West Central Florida P.B.A. PA	Political Comm.	political org.	Check	
1/28/2016	412 E. Madison Street, #1102 Tampa, FL 336020000	(Federal or State)			\$1,000.00

#268	Palm Beach Co. PBA Assoc. P.C.	Political Comm.	political org.	Check	
1/28/2016	2100 N. Florida Mango Road West Palm Beach, FL 334090000	(Federal or State)			\$1,000.00
#269	Dade Co. Police Benevolent Ass	Political Comm.	political org.	Check	
1/28/2016	10680 N.W. 25th Street Miami, FL 331720000	(Federal or State)			\$1,000.00
#270	Ferman Acura 11025 N. Florida Avenue	Business	automotive services	Check	
1/28/2016	Tampa, FL 336120000				\$1,000.00
#271	Raymond Gadd 6504 Wisteria Loop	Individual	schoolsuperintendent	Check	
1/29/2016	Land O, FL 346380000				\$500.00
#272	Committee for a Stronger Flori	Political Comm.	political org.	Check	
1/29/2016	115 E. Park Avenue, #1 Tallahassee, FL 323010000	(Federal or State)			\$1,000.00
Total Contributions					\$82,940.00

Campaign Treasurer's Report – In-Kind Contributions

Seq# Date	Contributor	Entity	Occupation Amend	In-Kind Description Amount
#1 1/20/2016	Terry Phayre 8700 Citizens Drive New Port Richey, FL 346540000	Individual		delivery \$49.94
#2 1/20/2016	Linens by Arlene 7419 Walnut Street New Port Richey, FL 346520000	Business		event supplies \$80.00
#3 1/20/2016	Arlisa's Events 23110 State Road 54, #344 Lutz, FL 335490000	Business	event planning	beverages \$145.00

#4	Verizon Event Center	Business	eventcenter	facility rental	
1/20/2016	8718 Trouble Creek Road New Port Richey, FL 346530000				\$800.00
#5	Scott Cochran	Individual	lawenforcement	catering	
1/20/2016	8700 Citizens Drive New Port Richey, FL 346540000				\$800.00
#6	Eleana Loulourgas	Individual	student	facility rent/food & b	
1/25/2016	2115 Alexis Court Tarpon Springs, FL 346890000				\$940.87
#7	Penelope Loulourgas	Individual	h.r. specialist	facility rent/food & b	
1/25/2016	232 Howard Drive Belleair Beach, FL 337860000				\$940.87
#8	Maria Loulourgas	Individual	physician	facility rent/food & b	
1/25/2016	2115 Alexis Court Tarpon Springs, FL 346890000				\$940.88
#9	Arndrea Laporte	Individual		event supplies	
1/25/2016	11914 Oak Trail Way Port Richey, FL 346680000				\$84.39
Total In-Kind Contributions					\$4,781.95

Campaign Treasurer's Report – Itemized Expenditures

Seq#	Vendor	Purpose	Exp. Type	Amount
Date			Amend	
#1	Suncoast Printing	candidate petitions	Monetary	
1/27/2016	3601 Grand Boulevard New Port Richey, FL 346520000			\$20.33
#2	Monte Designs, LLC	campaign shirts/printing	Monetary	
1/29/2016	18134 Applejack Court Spring Hill, FL 346100000			\$4,725.71
Total Expenditures				\$4,746.04

Campaign Treasurer's Report – Fund Transfers

Seq#	Institution	Transfer Type	Nature of Account	
Date			Amend	Amount

Campaign Treasurer's Report – Distributions

Seq#	Vendor	Purpose	Expenditure Related Exp.	
Date			Amend	Amount

* Petty cash expenditures are realized when the funds are withdrawn for petty cash. Therefore, the referenced item is not included in the total.

Exhibit N

**RESIGNATION AGREEMENT, GENERAL RELEASE
AND WAIVER OF CLAIMS**

This Resignation Agreement, General Release and Waiver of Claims (this "Agreement" or "Resignation Agreement") is entered into as of this 27th day of March, 2019 (the "Effective Date") by and between CHRISTOPHER STARNES on behalf of himself and his heirs, successors and assigns (the "Employee") and the PASCO SHERIFF'S OFFICE on behalf of itself, its officials, officers, employees, former employees, predecessors, agents, legal representatives and all of its affiliated and related entities, and its successors and assigns (collectively, the "Employer"). Employee and Employer shall each be referred to individually as a "Party" and shall be referred to collectively as the "Parties."

WHEREAS, Employee was employed by Employer as a Law Enforcement Lieutenant; and

WHEREAS, Employer asserts that Employee allegedly violated certain General Orders; and

WHEREAS, Employee and Employer have determined that their interests would best be served by resolving fully and finally all grievances, disputes and claims Employee has or believes he has, against Employer arising out of Employee's employment with Employer and the alleged policy violations, including, but in no way limited to, Employee's right to have a Pre-Disciplinary Hearing and/or Employee's right to a Career Service Appeal Board hearing to appeal any disciplinary action (collectively, the "Claim"); provided, however, that this Agreement shall not in any way be construed as an admission by Employer that it has acted wrongfully with respect to Employee in connection with Employee's employment with Employer, or that Employee has any legal rights whatsoever against Employer; and

NOW, THEREFORE, in consideration of the foregoing and the mutual covenants and agreements set forth herein, which covenants and agreements constitute good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties agree as follows:

1. **RECITALS INCORPORATED.** The recitals set forth above are true and correct and are incorporated herein and made a part hereof.

2. **RESIGNATION.** Employee will submit a letter of irrevocable resignation from his position as a Law Enforcement Lieutenant of the Pasco Sheriff's Office to be effective the date Employee signs this Agreement. Employer hereby agrees to accept such resignation. f

3. **CONSIDERATION.** In consideration for Employee's resignation from Employer's agency, and the execution, non-revocation of and compliance with each of the


EMPLOYER


EMPLOYEE

terms and conditions of this Resignation Agreement, including the waiver and release of claims in Paragraph 4 hereof, and for and in full consideration and satisfaction of all claims that Employee has or may have against Employer, whether known or unknown, asserted or unasserted, based on any conduct occurring up to and including the date of execution of this Agreement, Employer agrees to provide Employee with the following:

- (A) For IA 2018-027(A), the General Order violation of G.O. 26.1, Section II., Subsection B (54), Conduct Unbecoming a Member of the Sheriff's Office, shall reflect a disposition of "unsubstantiated."
- (B) For IA 2018-027(A), the General Order violation of G.O. 26.1, Section II., Subsection B (5), Association with Criminals, shall reflect a disposition of "unsubstantiated."

Employee understands and agrees that this is all that he will receive from Employer as settlement of any and all claims of any kind that he has or may have against Employer as of the Effective Date. Employee agrees that Employer's obligations contained in this Resignation Agreement constitutes adequate and ample consideration for the rights and claims that Employee is releasing and waiving under this Agreement and for the obligations imposed upon him by virtue of this Agreement.

4. **RELEASE OF CLAIMS.** In exchange for the promises made by Employer in this Agreement, Employee knowingly and voluntarily forever waives, releases and discharges (a) Employer and its successors and assigns; (b) Employer's past and present officials, officers, employees, agents, lawyers, and representatives; (c) all of Employer's related corporations, partnerships, business entities, insurers or subsidiaries (collectively, the "Released Parties") from any and all claims, demands, causes of action, fees, damages, liabilities and expenses (inclusive of attorneys' fees) of any kind whatsoever, whether known or unknown, that Employee has ever had against any and all of the Released Parties by reason of any actual or alleged act, omission, transaction, practice, conduct, occurrence or other matter up to and including the date of his execution of this Agreement, including, but not limited to (i) any claim(s) under Title VII of the Civil Rights Act of 1964, as amended; The Florida Civil Rights Act; The Age Discrimination in Employment Act, as amended; The Americans with Disabilities Act, as amended; The Equal Pay Act, as amended; The Fair Labor Standards Act; The Family and Medical Leave Act, as amended; the Florida Private Whistleblower Act; the Florida Public Whistleblower Act; the Law Enforcement Officers' Bill of Rights; the Employee Retirement Income Security Act, as amended; the Florida Workers' Compensation Law's Retaliation provision; the Florida Wage Discrimination Law; the Florida Equal Pay Law; the Florida Omnibus AIDS Act; the Florida Discrimination on the Basis of Sickle Cell Trait Law; Florida OSHA; the Florida Constitution; Section 1983 of the Civil Rights Act of 1871; the Clean Indoor Air Act; or any local laws, codes or ordinances, amendments or regulations promulgated


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pursuant to any of the foregoing and/or any other Federal, state or local law (statutory, regulatory or otherwise) that may be legally waived and released, and (ii) any claims arising from public policy, contract, constitutional, common law or tort theory, including any claims of breach of implied or express contract, wrongful termination or discharge, retaliation, discrimination, unpaid wages, defamation, libel, slander, negligent or intentional infliction of emotional distress, negligent or intentional misrepresentation, tortious interference with contract, fraudulent inducement, fraudulent concealment, invasion of privacy, assault, battery, false imprisonment, non-physical injury, personal injury or sickness or any other harm. This waiver and release also waives and releases any claim or demand for loss or damages of any kind, including costs, fees, attorneys' fees or other expenses. Employee expressly waives and releases his right to file an administrative charge or complaint with the Florida Commission on Human Relations or any appeal or charge with the Florida Public Employees Relations Commission. The listing of claims waived in this Paragraph 4 is intended to be illustrative rather than exhaustive. Thus, Employee acknowledges and agrees that this Agreement constitutes a full and final bar to any and all claims of any type that he now has, has had or may have against the Released Parties as of the Effective Date. Employee also waives his right to have a Pre-Disciplinary Hearing and/or Career Service Appeal Board hearing to appeal any disciplinary action and/or separation from employment.

However, this general release of claims excludes the filing of an administrative charge or complaint with the Equal Employment Opportunity Commission, and is not intended to prevent Employee from participating in an investigation or proceeding with any government agency charged with enforcement of any law, although Employee waives any right to monetary relief related to such a charge or proceeding. This general release of claims also excludes any claims made under Florida workers' compensation or unemployment compensation laws, and/or any other claims which cannot be waived by law. This release is also not intended to waive Employee's vested benefits and rights to any retirement and/or 401K benefits pursuant to those benefit plans.

Employer, any affiliated entities, its past and present parents, subsidiaries, and present and former employees, officers, directors, agents, successors and assigns of any of them knowingly and voluntarily releases and forever discharges Employee of and from any and all claims, known and unknown, anticipated and unanticipated, asserted and unasserted, which Employer has or may have against Employee as of the date of its execution of this Agreement, including, but not limited to, any alleged violation of any federal, state or local law, rule, regulation or ordinance; any public policy, contract, tort, or common law; or any basis for recovering costs, fees, or other expenses including attorneys' fees incurred in these matters.

5. EMPLOYEE ACKNOWLEDGEMENTS. Employee specifically represents, warrants and confirms to Employer that he is not a party to any allegations,


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claims, charges, actions, complaints, lawsuits, appeals or proceedings against Employer in any form or forum. Employee further specifically represents, warrants and confirms to Employer that as of the Effective Date, he has been paid and has received all paid or unpaid leave, compensation, wages, vacation or sick pay, bonuses, commissions, and/or benefits to which Employee may be entitled and no other amounts are due to him, except as may be provided in this Agreement. Employee affirms and represents to Employer that while he was employed with Employer, Employee has or had no known and unreported workplace injuries or occupational diseases other than those injuries which were previously reported. Employee likewise agrees that he has never been denied requested leave under the Family and Medical Leave Act or any Employer leave policy while employed with Employer. In addition, Employee affirms that he has not been asked to provide or produce any genetic information and that no employment decisions were based on any genetic information.

6. **NEUTRAL REFERENCE.** Employee shall direct all employment verification requests and/or references to Employer's human resources department. In response to requests for employment verification and/or references, in accordance with the Employer's policy, Employer will only provide Employee's dates of employment and last position held and no other information. Employer will comply with Chapter 119, Florida Statutes, and will release non-confidential documents pursuant to any public records requests.

7. **NON-DISPARAGEMENT.** Employee agrees that he will not make derogatory or disparaging statements, in writing or verbally, to any person regarding Sheriff Nocco or the Pasco Sheriff's Office that could damage the reputation of the Pasco Sheriff or the Sheriff's Office. Employee understands that if he violates this non-disparagement provision, it will constitute a material breach of this Agreement by Employee, which shall entitle the Pasco Sheriff and/or Pasco Sheriff's Office to recover any and all fees and costs associated with enforcement of this non-disparagement provision. Nothing in the Agreement prohibits either party from reporting possible violations of law, rule or regulation to any government and/or regulatory agency, cooperating with any governmental and/or regulatory agency, participating in any governmental and/or regulatory investigation or providing truthful testimony to a governmental and/or regulatory agency or as may be compelled or required by law.

8. **NO RE-EMPLOYMENT.** In exchange for the consideration herein, Employee waives all rights and claims to reinstatement as an employee with Employer and agrees not to knowingly apply for, solicit, seek, or otherwise attempt to obtain or accept employment with Employer. Employee further agrees that Employer shall not be under any obligation to employ or contract with him and that, should any application be made by him, Employer shall not have any obligation to process that application or to hire Employee. Employee agrees that if Employer declines to employ him, Employer shall not


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be liable for any damages. Employee acknowledges that this clause is not retaliatory and that the failure to process the application or to hire him is based exclusively upon the Parties' arms-length bargaining and shall not constitute a violation of any local, state or federal law. Nothing in this provision is intended to prevent Employee from seeking or obtaining employment with any other local government and/or case management/child services entity.

9. ATTORNEYS' FEES AND COSTS. Each party shall pay their own attorneys' fees and costs incurred in connection with negotiating and preparing this Agreement.

10. NO ADMISSION OF LIABILITY. Nothing herein shall be construed to be an admission by Employer of any wrongdoing or noncompliance with any federal, state, city or local rule, ordinance, constitution, statute, contract, public policy, wage and hour law, wage payment law, tort law, common law or of any other unlawful conduct, liability, wrongdoing or breach of any duty whatsoever. Employer specifically disclaims and denies any liability to Employee. The Parties further agree that this Agreement and Employer's compliance with the terms of Paragraph 3 hereof is not an admission that Employee was entitled to or otherwise owed any money and shall not be used in any manner whatsoever to prove any liability or fact in any present or future lawsuit, litigation or proceeding against any of the Released Parties.

11. GOVERNING LAW. This Agreement shall be governed and construed in accordance with the laws of the State of Florida without regard to conflict-of-law principles. The state and federal courts sitting in the State of Florida, Pasco County, shall have personal and subject matter jurisdiction over, and the parties each hereby submit exclusively to the venue of such courts with respect to any dispute arising out of or related to this Agreement. The Parties waive any objection to jurisdiction or venue of the state or federal courts sitting in the State of Florida, Pasco County.

12. SEVERABILITY. Should any provision of this Agreement be held by a court of competent jurisdiction to be enforceable only if modified, or if any portion of this Agreement shall be held as unenforceable and thus stricken, such holding shall not affect the validity of the remainder of this Agreement, the balance of which shall continue to be binding upon the Parties with any such modification to become a part hereof and treated as though originally set forth in this Agreement. The Parties further agree that any such court is expressly authorized to modify any such unenforceable provision of this Agreement in lieu of severing such unenforceable provision from this Agreement in its entirety, whether by rewriting the offending provision, deleting any or all of the offending provision, adding additional language to this Agreement or by making such other modifications as it deems warranted to carry out the intent and agreement of the Parties as embodied herein to the maximum extent permitted by law. The Parties expressly agree that this Agreement as so


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modified by the court shall be binding upon and enforceable against each of them. In any event, should one or more of the provisions of this Agreement be held to be invalid, illegal or unenforceable in any respect, such invalidity, illegality or unenforceability shall not affect any other provisions hereof, and if such provision or provisions are not modified as provided above, this Agreement shall be construed as if such invalid, illegal or unenforceable provisions had not been set forth herein.

13. **ENTIRE AGREEMENT.** This Agreement contains all of the understandings and representations between Employee and Employer relating to the subject matter herein and supersedes all prior and contemporaneous understandings, discussions, agreements, representations and warranties, both written and oral, between the Parties, except as otherwise specified in this Agreement. Employee acknowledges that he has not relied on any representations, promises, or agreements of any kind made to him in connection with his decision to sign this Agreement except for those expressly set forth in this Agreement.

14. **KNOWING AND VOLUNTARY ACKNOWLEDGMENT.** The Parties acknowledge that they have read this Agreement and have executed this Agreement voluntarily, with full and complete knowledge of its terms and the effect of those terms on their respective rights and obligations, and that they have had an opportunity to consult with legal counsel prior to executing this Agreement, and that they did in fact consult counsel prior to executing it.

15. **EXECUTION IN COUNTERPARTS; FACSIMILE COPIES.** This Agreement may be executed in counterparts, each of which shall constitute one and the same instrument. Additionally, the Parties may execute the different counterparts of this Agreement separately, and all such separately executed counterparts, when taken together, shall be treated in all manner and respect as an original document. Finally, any signature delivered by electronic transmission shall be treated in all manner respect as an original document.

16. **AMENDMENTS.** This Agreement may not be amended, modified, altered, or changed except by a written agreement which is both signed by both parties and which makes specific reference to this Agreement.

17. **AUTHORSHIP.** Employer and Employee agree that this Termination Agreement is the product of negotiation and shall not be construed against either Party on the basis of sole authorship.

18. **BENEFIT.** All of the foregoing shall inure to the benefit of Employer, its affiliates and related entities, together with all predecessors, successors, and assigns and all past and present officials, representatives, agents, officers, attorneys, insurers, and


EMPLOYER


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employees of each of the foregoing, as appropriate, and each of the Released Parties, and be binding upon Employee's heirs, executors, administrators, legal representatives, successors, and assigns.

19. **RIGHT TO JURY TRIAL.** THE PARTIES HERETO WAIVE ANY RIGHT TO A TRIAL BY JURY IN ANY ACTION TO ENFORCE OR DEFEND ANY MATTER ARISING FROM OR RELATED TO THIS AGREEMENT. THIS WAIVER DOES NOT PRECLUDE EITHER PARTY FROM SEEKING RELIEF FOR ANY BREACH OF THIS AGREEMENT IN THE CIRCUIT COURT OF PASCO COUNTY, FLORIDA.

20. **CAPTIONS.** Captions and headings of the sections and paragraphs of this Agreement are intended solely for convenience and no provision of this Agreement is to be construed by reference to the caption or heading of any section or paragraph.

21. **ENFORCEMENT.** Should Employee breach any of the terms of this Agreement, to the extent authorized by Florida law, Employee shall be responsible for payment of all reasonable attorneys' fees and costs that Employer incurred in the course of enforcing the terms of this Agreement, including demonstrating the existence of a breach or any other contract enforcement efforts. The term "attorneys' fees" shall include, but not be limited to, fees incurred by attorneys, paralegals, or other staff members operating under the supervision of an attorney as defined by law.

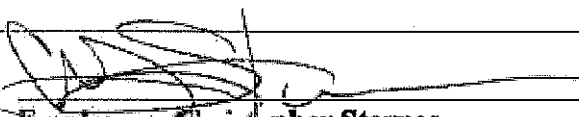
22. **EFFECTIVE DATE.** This Agreement shall become effective on the date Employee signs this Agreement.

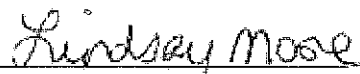
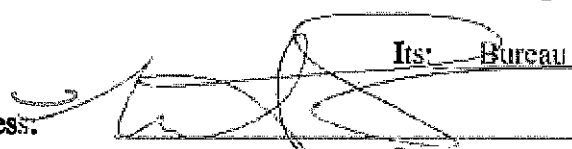
[SIGNATURES ON NEXT PAGE]


EMPLOYER


EMPLOYEE

HAVING ELECTED TO EXECUTE THIS AGREEMENT AND TO FULFILL THE PROMISES SET FORTH HEREIN, EMPLOYEE AND EMPLOYER KNOWINGLY, AND AFTER DUE REFLECTION, VOLUNTARILY ENTER INTO THIS AGREEMENT.

Dated:	<u>3/27/19</u>	 Employee: Christopher Starnes
Witness:	<u>Craig A. Lazar</u>	
Print Name:	<u>Craig A. Lazar</u>	
Address:	<u>11914 Oak Trail Way</u> <u>Port Richey, FL 34668</u>	

Dated:	<u>3/27/19</u>	By: <u>Lindsay Moore</u>  For Employer, Pasco Sheriff's Office
		Its: <u>Bureau Chief / General Counsel</u>
Witness:		
Print Name:	<u>Natalie Scruggs</u>	
Address:	<u>8700 Citizen Drive</u> <u>New Port Richey, FL 34654</u>	

[END OF DOCUMENT]


EMPLOYER


EMPLOYEE

Exhibit O

Pasco's Sheriff Office

Attendance Record

PSO\BB3521

1 of 1

From: 5/7/2018

To: 5/20/2018

3521 BIRGE, BENJAMIN R**SERGEANT K-9**

	<i>Pay Class: HOURLY CERTIFIED</i>			<i>Calendar: CERTIFIED HOURLY CALENDAR</i>				
	5/7/2018	5/8/2018	5/9/2018	5/10/2018	5/11/2018	5/12/2018	5/13/2018	Total
HOUR-CT	2.00	0	0	0	0	0	0	2.00
HOUR-EM	1.00	0	0	0	0	0	0	1.00
HOUR-R	0.50	4.50	10.50	12.50	0.50	8.50	0.50	37.50
HOUR-SW	0	2.00	0	0	0	0	0	2.00
Total	3.50	6.50	10.50	12.50	0.50	8.50	0.50	42.50
	5/14/2018	5/15/2018	5/16/2018	5/17/2018	5/18/2018	5/19/2018	5/20/2018	Total
HOUR-R	0.50	0.50	0.50	7.50	0.50	0.50	0.50	10.50
HOUR-TG	0	0	9.00	0	10.00	10.00	12.00	41.00
Total	0.50	0.50	9.50	7.50	10.50	10.50	12.50	51.50

Date	Ring In	Ring Out	Hours	Work Order	Reason	Comment
5/7/2018	08:00	10:00	2.00000		0Not Applicable	SUBPOENA COURT
5/8/2018	15:30	19:30	4.00000		0Not Applicable	AOA HIGHLANDS COUNTY GENTRY MEMORIAL SER
5/8/2018	13:00	15:00	2.00000		0Not Applicable	SWAT DIRECTIVE MEETING
5/9/2018	08:00	18:00	10.00000		0Not Applicable	
5/10/2018	09:00	21:00	12.00000		0Not Applicable	
5/12/2018	10:00	18:00	8.00000		0Not Applicable	
5/16/2018	08:00	17:00	9.00000		0Not Applicable	SWAT TRAINIGN MAY
5/17/2018	15:00	22:00	7.00000		0Not Applicable	TRAINING AND TRAVEL FOR HRD
5/18/2018	07:00	17:00	10.00000		0Not Applicable	HRD TRAINING SEMINAR
5/19/2018	07:00	17:00	10.00000		0Not Applicable	HRD TRAINING SEMINAR
5/20/2018	07:00	19:00	12.00000		0Not Applicable	HRD SEMINAR AND TRAVEL

I certify that the time card entries I am submitting are accurate and truthful to the best of my knowledge.

Member's Signature



5/16/2018

Date

Supervisor's Approval

Date

Pasco's Sheriff Office

Attendance Record

PSO\BB3521

1 of 1

From: 5/21/2018

To: 6/3/2018

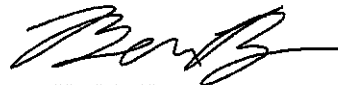
3521 BIRGE, BENJAMIN R**SERGEANT K-9**

	<i>Pay Class: HOURLY CERTIFIED</i>				<i>Calendar: CERTIFIED HOURLY CALENDAR</i>			
	5/21/2018	5/22/2018	5/23/2018	5/24/2018	5/25/2018	5/26/2018	5/27/2018	Total
HOUR-EM	1.00	0	0	0	0	0	0	1.00
HOUR-R	9.50	9.50	14.50	0.50	8.50	2.50	0.50	45.50
Total	10.50	9.50	14.50	0.50	8.50	2.50	0.50	46.50
	5/28/2018	5/29/2018	5/30/2018	5/31/2018	6/1/2018	6/2/2018	6/3/2018	Total
HOUR-HP	8.50	0	0	0	0	0	0	8.50
HOUR-R	0.50	0.50	9.50	9.50	9.50	8.50	0.50	38.50
Total	9.00	0.50	9.50	9.50	9.50	8.50	0.50	47.00

Date	Ring In	Ring Out	Hours	Work Order	Reason	Comment
5/21/2018	08:00	17:00	9.00000		0Not Applicable	
5/22/2018	10:00	19:00	9.00000		0Not Applicable	
5/23/2018	18:00	21:00	3.00000		0Not Applicable	K9 FIRST AID CLASS
5/23/2018	07:00	18:00	11.00000		0Not Applicable	
5/25/2018	09:00	17:00	8.00000		0Not Applicable	
5/26/2018	09:00	11:00	2.00000		0Not Applicable	
5/30/2018	09:00	18:00	9.00000		0Not Applicable	
5/31/2018	08:00	17:00	9.00000		0Not Applicable	
6/1/2018	08:00	17:00	9.00000		0Not Applicable	
6/2/2018	08:00	16:00	8.00000		0Not Applicable	

I certify that the time card entries I am submitting are accurate and truthful to the best of my knowledge.

Member's Signature



5/30/2018

Date

Supervisor's Approval

Date

Pasco's Sheriff Office

Attendance Record

PSO\BB3521

1 of 1

From: 6/4/2018

To: 6/17/2018

3521 BIRGE, BENJAMIN R**SERGEANT K-9**

	<i>Pay Class: HOURLY CERTIFIED</i>				<i>Calendar: CERTIFIED HOURLY CALENDAR</i>			
	6/4/2018	6/5/2018	6/6/2018	6/7/2018	6/8/2018	6/9/2018	6/10/2018	Total
HOUR-EM	1.00	0	0	0	0	0	0	1.00
HOUR-R	0.50	12.50	10.50	9.50	9.50	0.50	0.50	43.50
Total	1.50	12.50	10.50	9.50	9.50	0.50	0.50	44.50
	6/11/2018	6/12/2018	6/13/2018	6/14/2018	6/15/2018	6/16/2018	6/17/2018	Total
HOUR-CT	2.00	0	0	0	0	0	0	2.00
HOUR-R	0.50	0.50	12.50	9.50	0.50	6.50	0.50	30.50
HOUR-TG	0	0	0	0	10.00	0	0	10.00
Total	2.50	0.50	12.50	9.50	10.50	6.50	0.50	42.50

Date	Ring In	Ring Out	Hours	Work Order	Reason	Comment
6/5/2018	05:00	17:00	12.00000		0Not Applicable	
6/6/2018	05:00	15:00	10.00000		0Not Applicable	
6/7/2018	08:00	17:00	9.00000		0Not Applicable	
6/8/2018	08:00	17:00	9.00000		0Not Applicable	
6/11/2018	09:00	11:00	2.00000		0Not Applicable	
6/13/2018	05:00	17:00	12.00000		0Not Applicable	
6/14/2018	08:00	17:00	9.00000		0Not Applicable	
6/15/2018	08:00	18:00	10.00000		0Not Applicable	SWAT TRAINING JUNE
6/16/2018	08:00	14:00	6.00000		0Not Applicable	

I certify that the time card entries I am submitting are accurate and truthful to the best of my knowledge.

Member's Signature



6/14/2018

Date

Supervisor's Approval

Date

Pasco's Sheriff Office

Attendance Record

PSO\BB3521

1 of 1

From: 6/18/2018

To: 7/1/2018

3521 BIRGE, BENJAMIN R**SERGEANT K-9**

	<i>Pay Class: HOURLY CERTIFIED</i>				<i>Calendar: CERTIFIED HOURLY CALENDAR</i>			
	6/18/2018	6/19/2018	6/20/2018	6/21/2018	6/22/2018	6/23/2018	6/24/2018	Total
HOUR-EM	1.00	0	0	0	0	0	0	1.00
HOUR-R	3.50	0.50	10.50	9.50	7.50	10.50	0.50	42.50
HOUR-VA	0	0	0	0	2.00	0	0	2.00
Total	4.50	0.50	10.50	9.50	9.50	10.50	0.50	45.50
	6/25/2018	6/26/2018	6/27/2018	6/28/2018	6/29/2018	6/30/2018	7/1/2018	Total
HOUR-R	0.50	9.50	9.50	9.50	9.50	0.50	0.50	39.50
Total	0.50	9.50	9.50	9.50	9.50	0.50	0.50	39.50

Date	Ring In	Ring Out	Hours	Work Order	Reason	Comment
6/18/2018	08:00	11:00	3.00000		0Not Applicable	K9 VEST AND ADMIN
6/20/2018	08:00	18:00	10.00000		0Not Applicable	
6/21/2018	08:00	17:00	9.00000		0Not Applicable	
6/22/2018	11:00	14:00	3.00000		0Not Applicable	PHSYC FOLLOW UP 1 YEAR
6/22/2018	06:00	10:00	4.00000		0Not Applicable	K9 DEMO AND CHECK PRESENTATION
6/23/2018	15:00	18:00	3.00000		0Not Applicable	SWAT DEMO WC
6/23/2018	08:00	15:00	7.00000		0Not Applicable	
6/26/2018	08:00	17:00	9.00000		0Not Applicable	
6/27/2018	08:00	17:00	9.00000		0Not Applicable	
6/28/2018	08:00	17:00	9.00000		0Not Applicable	
6/29/2018	08:00	17:00	9.00000		0Not Applicable	

I certify that the time card entries I am submitting are accurate and truthful to the best of my knowledge.

Member's Signature



6/27/2018

Date

Supervisor's Approval

Date

Pasco's Sheriff Office

Attendance Record

PSO\BB3521

1 of 1

From: 7/2/2018

To: 7/15/2018

3521 BIRGE, BENJAMIN R**SERGEANT K-9**

	<i>Pay Class: HOURLY CERTIFIED</i>			<i>Calendar: CERTIFIED HOURLY CALENDAR</i>				
	7/2/2018	7/3/2018	7/4/2018	7/5/2018	7/6/2018	7/7/2018	7/8/2018	Total
HOUR-EM	1.00	0	0	0	0	0	0	1.00
HOUR-HP	0	0	8.50	0	0	0	0	8.50
HOUR-R	0.50	0.50	0.50	0.50	0.50	0.50	0.50	3.50
HOUR-VA	0	9.00	9.00	9.00	9.00	0	0	36.00
Total	1.50	9.50	18.00	9.50	9.50	0.50	0.50	49.00
	7/9/2018	7/10/2018	7/11/2018	7/12/2018	7/13/2018	7/14/2018	7/15/2018	Total
HOUR-R	0.50	0.50	0.50	12.50	6.50	0.50	0.50	21.50
HOUR-VA	9.00	9.00	5.00	0	0	0	0	23.00
Total	9.50	9.50	5.50	12.50	6.50	0.50	0.50	44.50

Date	Ring In	Ring Out	Hours	Work Order	Reason	Comment
7/12/2018	05:00	17:00	12.00000		0Not Applicable	
7/13/2018	08:00	14:00	6.00000		0Not Applicable	

I certify that the time card entries I am submitting are accurate and truthful to the best of my knowledge.

Member's Signature



7/13/2018

Date

Supervisor's Approval

Date

Pasco's Sheriff Office

Attendance Record

PSO\BB3521

1 of 1

From: 7/16/2018

To: 7/29/2018

3521 BIRGE, BENJAMIN R**SERGEANT K-9**

	<i>Pay Class: HOURLY CERTIFIED</i>				<i>Calendar: CERTIFIED HOURLY CALENDAR</i>			
	7/16/2018	7/17/2018	7/18/2018	7/19/2018	7/20/2018	7/21/2018	7/22/2018	Total
HOUR-EM	1.00	0	0	0	0	0	0	1.00
HOUR-R	0.50	0.50	10.50	12.50	9.50	9.50	0.50	43.50
Total	1.50	0.50	10.50	12.50	9.50	9.50	0.50	44.50
	7/23/2018	7/24/2018	7/25/2018	7/26/2018	7/27/2018	7/28/2018	7/29/2018	Total
HOUR-R	0.50	6.50	9.50	9.50	9.50	4.50	10.50	50.50
Total	0.50	6.50	9.50	9.50	9.50	4.50	10.50	50.50

Date	Ring In	Ring Out	Hours	Work Order	Reason	Comment
7/18/2018	08:00	18:00	10.00000		0Not Applicable	
7/19/2018	07:00	19:00	12.00000		0Not Applicable	
7/20/2018	08:00	17:00	9.00000		0Not Applicable	
7/21/2018	08:00	17:00	9.00000		0Not Applicable	
7/24/2018	10:00	16:00	6.00000		0Not Applicable	
7/25/2018	08:00	17:00	9.00000		0Not Applicable	
7/26/2018	08:00	17:00	9.00000		0Not Applicable	
7/27/2018	08:00	17:00	9.00000		0Not Applicable	
7/28/2018	08:00	12:00	4.00000		0Not Applicable	
7/29/2018	10:00	20:00	10.00000		0Not Applicable	SCALLOP CONOP ASSIGNMENT

I certify that the time card entries I am submitting are accurate and truthful to the best of my knowledge.

Member's Signature



7/25/2018

Date

Supervisor's Approval

Date

Pasco's Sheriff Office

Attendance Record

PSO\BB3521

1 of 1

From: 8/13/2018

To: 8/26/2018

3521 BIRGE, BENJAMIN R**SERGEANT K-9**

	Pay Class: HOURLY CERTIFIED			Calendar: CERTIFIED HOURLY CALENDAR				
	8/13/2018	8/14/2018	8/15/2018	8/16/2018	8/17/2018	8/18/2018	8/19/2018	Total
HOUR-EM	1.00	0	0	0	0	0	0	1.00
HOUR-R	6.50	9.50	10.50	9.50	8.50	0.50	0.50	45.50
Total	7.50	9.50	10.50	9.50	8.50	0.50	0.50	46.50
	8/20/2018	8/21/2018	8/22/2018	8/23/2018	8/24/2018	8/25/2018	8/26/2018	Total
HOUR-R	0.50	9.50	9.50	9.50	8.50	0.50	0.50	38.50
HOUR-SW	0	5.00	0	0	0	0	0	5.00
Total	0.50	14.50	9.50	9.50	8.50	0.50	0.50	43.50

Date	Ring In	Ring Out	Hours	Work Order	Reason	Comment
8/13/2018	11:00	17:00	6.00000		0Not Applicable	ST PETE AOA
8/14/2018	08:00	17:00	9.00000		0Not Applicable	
8/15/2018	07:00	17:00	10.00000		0Not Applicable	
8/16/2018	08:00	17:00	9.00000		0Not Applicable	
8/17/2018	08:00	16:00	8.00000		0Not Applicable	
8/21/2018	08:00	17:00	9.00000		0Not Applicable	
8/21/2018	19:00	23:59	5.00000		0Not Applicable	MCU SEARCH WARRANT/ CALLOUT
8/22/2018	08:00	17:00	9.00000		0Not Applicable	
8/23/2018	05:00	14:00	9.00000		0Not Applicable	
8/24/2018	05:00	13:00	8.00000		0Not Applicable	

I certify that the time
card entries I am
submitting are accurate
and truthful to the best
of my knowledge.

Member's Signature



8/22/2018

Date

Supervisor's Approval

Date

Pasco's Sheriff Office

Attendance Record

PSO\BB3521

1 of 1

From: 9/10/2018

To: 9/23/2018

3521 BIRGE, BENJAMIN R**SERGEANT K-9**

	Pay Class: HOURLY CERTIFIED			Calendar: CERTIFIED HOURLY CALENDAR				
	9/10/2018	9/11/2018	9/12/2018	9/13/2018	9/14/2018	9/15/2018	9/16/2018	Total
HOUR-EM	1.00	0	0	0	0	0	0	1.00
HOUR-R	0.50	10.50	9.50	8.50	12.50	0.50	2.50	44.50
Total	1.50	10.50	9.50	8.50	12.50	0.50	2.50	45.50
	9/17/2018	9/18/2018	9/19/2018	9/20/2018	9/21/2018	9/22/2018	9/23/2018	Total
HOUR-R	0.50	9.50	8.50	9.50	0.50	0.50	0.50	29.50
HOUR-VA	0	0	0	0	10.00	0	0	10.00
Total	0.50	9.50	8.50	9.50	10.50	0.50	0.50	39.50

Date	Ring In	Ring Out	Hours	Work Order	Reason	Comment
9/11/2018	05:00	15:00	10.00000		0Not Applicable	
9/12/2018	07:00	16:00	9.00000		0Not Applicable	
9/13/2018	07:00	15:00	8.00000		0Not Applicable	
9/14/2018	05:00	17:00	12.00000		0Not Applicable	
9/16/2018	19:00	21:00	2.00000		0Not Applicable	K9 VIDEO AND ADMIN
9/18/2018	05:00	14:00	9.00000		0Not Applicable	
9/19/2018	05:00	13:00	8.00000		0Not Applicable	
9/20/2018	05:00	14:00	9.00000		0Not Applicable	

I certify that the time
card entries I am
submitting are accurate
and truthful to the best
of my knowledge.

Member's Signature

Supervisor's Approval



9/19/2018

Date

Date

Pasco's Sheriff Office

Attendance Record

PSO\BB3521

1 of 1

From: 10/8/2018

To: 10/21/2018

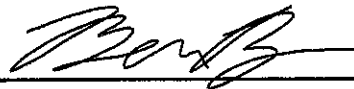
3521 BIRGE, BENJAMIN R**SERGEANT K-9**

	Pay Class: HOURLY CERTIFIED			Calendar: CERTIFIED HOURLY CALENDAR				
	10/8/2018	10/9/2018	10/10/2018	10/11/2018	10/12/2018	10/13/2018	10/14/2018	Total
HOURLY-EM	1.00	0	0	0	0	0	0	1.00
HOURLY-R	3.50	9.50	9.50	9.50	8.50	0.50	0.50	41.50
Total	4.50	9.50	9.50	9.50	8.50	0.50	0.50	42.50
	10/15/2018	10/16/2018	10/17/2018	10/18/2018	10/19/2018	10/20/2018	10/21/2018	Total
HOURLY-R	7.50	11.00	4.00	6.50	5.50	0.50	4.50	39.50
HOURLY-SW	0	0	0	0	0	4.00	0	4.00
Total	7.50	11.00	4.00	6.50	5.50	4.50	4.50	43.50

Date	Ring In	Ring Out	Hours	Work Order	Reason	Comment
10/8/2018	12:00	15:00	3.00000		0Not Applicable	
10/9/2018	07:30	16:30	9.00000		0Not Applicable	
10/10/2018	08:00	17:00	9.00000		0Not Applicable	
10/11/2018	07:00	16:00	9.00000		0Not Applicable	
10/12/2018	07:00	15:00	8.00000		0Not Applicable	
10/15/2018	08:00	15:00	7.00000		0Not Applicable	
10/16/2018	07:00	17:30	10.50000		0Not Applicable	
10/17/2018	09:30	13:00	3.50000		0Not Applicable	
10/18/2018	07:00	11:00	4.00000		0Not Applicable	
10/18/2018	19:00	21:00	2.00000		0Not Applicable	MEETING REF X44
10/19/2018	12:00	17:00	5.00000		0Not Applicable	
10/20/2018	11:00	15:00	4.00000		0Not Applicable	SPOOKY TAILS DEMO
10/21/2018	09:00	13:00	4.00000		0Not Applicable	TRAINING HERNANDO MOUNTED UNIT

I certify that the time card entries I am submitting are accurate and truthful to the best of my knowledge.

Member's Signature



10/17/2018

Date

Supervisor's Approval

Date

Exhibit P

March 2018 - October 2018
K9 Patrol Monthly Training Hours

	Pini	Garcia	Carmack	Liddick	Ferguson	Sentner	Bingham	Stone	Baltzer
March	0	10	2	4	9.5	11	22	10.5	18
April	0	0	7	13	12	18	26	11.75	19.5
May	0	1	0	10	8.25	6	18	4.5	18
June	0	10	17	12	2.25	13	18	9.5	17.5
July	10	1	0	18	10	6	6	4.25	6.75
August	8	8	1	18	8	19	25	15.5	14.25
September	0	10	7	13	11	15	44	7.5	27
October	0	0	8	3	5.5	19	17	10.25	4
Total Training Hours	18	40	42	91	66.5	107	176	73.75	125
Monthly Average	2.25	5	5.25	11.375	8.3125	13.375	22	9.21875	15.625
Monthly Average Per Deputy as a unit	9.59766								MY Monthly Avg 15.625

Exhibit Q

Fw: SWAT K9 SOP's

Ethridge Hall

Wed 11/7/2018 10:45 AM

To: William Ferguson <WDFerguson@pascosheriff.org>;

Corporal Ethridge "Jimmy" Hall
K9 Trainer
Pasco Sheriff's Office
727-434-3336

From: Brad Smith <topdogwck1@aol.com>
Sent: Tuesday, September 11, 2018 5:34 PM
To: Ethridge Hall; t.anderson@npca.net
Subject: Re: SWAT K9 SOP's

Jimmy, you took the words right out of my keyboard. The dog is too handler sensitive / dependent, lacks confidence while searching, had a major issues with a gas environment. If I recall correctly he had issues with a simple find behind a door. Now this doesn't mean with a lot of extra training and exposure the dog my come around but its going to take a while.

I also think the dog is a low drive dog. I prefer a dogs drive to be much higher, his aggression to be much higher as well as his fight drive but I don't think he will ever have. Its just not in the dogs genes.

As of today, I would not deploy Tundra on SWAT.

Brad Smith
West Covina PD, CA (Ret)
Canine Tactical Operations & Consulting
NTOA K9 Chairman
K9 SME CATO
www.K9TacOps.com

Exhibit R

**PASCO SHERIFF'S OFFICE
INTEROFFICE MEMORANDUM**

TO: Sergeant W. Ferguson / Sergeant B. Birge **DATE:** 11/1/18

SUBJECT: K9 Tundra

FROM: Corporal J. Hall **REFERENCE:** Performance Issues

This memo is written to outline some performance issues I have observed with K9 Tundra, who is being handled by Cpl. Baltzer.

It is my opinion that K9 Tundra is overly handler dependant, which causes performance issues in several areas. While trying to enter the SWAT Working Dog (SWD) program I noticed that K9 Tundra was very "flat" at times in terms of drive. The canine often looks at the handler for reassurance, which can cause him not to range out as far on searches and cause him to show visible signs of being unsure or apprehensive. The following are a few examples of this behavior I have observed:

- 5/12/18 – Building searches at the Citrus Center in Dade City – 1st rep K9 Tundra was deployed from the bottom of stairs to a decoy wearing the bodysuit in an open room, in front of an open door. 2nd rep Tundra was deployed from the same location and the decoy was hiding behind the door. 3rd rep Tundra was placed in the muzzle and deployed from the same location, the decoy remained in the bodysuit and hid in the same place, but left the door open.

I debriefed the decoy, who was Sgt. Birge and he advised me that on the first rep Tundra came in much slower and showed much more apprehensiveness than K9 Benco, who was also conducting the training. The same behavior was exhibited on the second rep and on the third rep Tundra did not initially engage the decoy and had to be coaxed into the engagement. All of the engagements did improve when the handler was able to get up the stairs and encourage the dog. Due to Tundra's age and the fact he had recently completed canine school, the issues were identified as things to train and improve on.

Approved	Disapproved	Acknowledged	Date	Name/CJIS

• 6/16/18 – SWAT Training – Rushe Middle School – During this training the SWAT team was practicing active shooter, conducting room entries and approach drills. Cpl. Baltzer and Tundra attended to continue to work towards becoming an SWD. While most of my attention was on Dep. Bingham and K9 Benco, I did have Baltzer/Tundra conduct some movements with the SWAT team, mainly working on stack formations and entries. I did notice K9 Tundra flinch and cower a few times as a result of a door slamming and one time when a chair was kicked out of the way by a SWAT Team member. Overall Tundra carried himself in a calm manner, which is behavior we want, but I believe it is a result of lower confidence and drive. I identified these issues and talked to Cpl. Baltzer about training he needs to do to move forward.

• 8/26/18 – Live Fire Range Training – While conditioning Tundra to live fire, we conducted clicker food training. Initially Tundra was accepted the training but as time went on he became increasingly nervous about me standing behind him holding the lead. Tundra would get “spooked” by the sound of the clicker and would break position and cower. I had to stop the training and put him up. We would later re-introduce the training, this time with the tug toy instead of food and we were able to condition Tundra to be passive to gunfire. Cpl. Baltzer did continue to work on his own with Tundra and as a result the dog made great improvement in the area of live gun fire.

• 9/6/18 – SKIDDS Class, Bossier Parrish Louisiana – While conducting gas training in a gas house, Tundra refused to enter and had to be carried in by Cpl. Baltzer. I was not inside, but Cpl. Baltzer told me Tundra was initially apprehensive, but was able to engage the decoy who was wearing a full bodysuit. The instructors made Tundra repeat the exercise and again Tundra refused to go inside and had to be carried. Cpl. Baltzer again told me that he was able to conduct the search scenario and engage the decoy. During this three day class I observed Tundra in several exercises, such as building searches, vehicle takedowns, live fire and tactical tracking exercises. Tundra completed the training, but in most areas he exhibits a “flat” low drive demeanor and often looks to Cpl. Baltzer for encouragement. I again identified Tundra’s deficiencies and spoke to Cpl. Baltzer about training and lifestyle changes that could improve Tundra’s performance.

Overall I feel K9 Tundra lacks the confidence and drive to work independent of Cpl. Baltzer. I have spoken with the patrol dog trainer, Cpl. Rux, who has also witnessed similar behavior. We both agree that the issue has risen to the level of officer safety.

After Speaking with Corporal Rux, I attended the next patrol training to witness Cpl. Baltzer and K9 Tundra conduct building search training. On 11/1/18 Cpl. Rux conducted patrol training at an abandoned warehouse/building located on the corner of Main St and US 19 in New Port Richey. The first scenario was a basic building search with a decoy hiding behind a closed door. Cpl. Baltzer followed standard protocol and made several announcements then released Tundra into the search area. Tundra’s drive to search was lower than I would like to see it, however he did eventually locate the decoy, gave an audible alert and when the door was opened he did engage. I debriefed Deputy Stone, who was the decoy and he told me the bite was fair. Deputy Stone was also using a broom to add realistic pressure to the dogs, but in Tundra’s case he had to stop using it because it was causing the dog to back down. The second scenario was an open warehouse search with the decoy in the far corner, hiding behind several small roll out residential garbage cans. Cpl. Rux set up the scenario so the

Page

dogs would have to negotiate the cans to get to the decoy, who again was wearing a full bite suit. Tundra went first and again showed very low search drive and several times looked back towards Cpl. Baltzer as he went out. Cpl. Baltzer stepped behind a door, so he would not be visible to the dog. Tundra eventually located the decoy and basically stared at him for a few seconds before coming all the way back to the start, looking for Cpl. Baltzer. At this point I had Cpl. Baltzer hook up Tundra and we had the decoy tease him. I had Cpl. Baltzer place Tundra back in the car in an attempt to build drive. After all the other dogs went without any problems, Cpl. Baltzer again conducted another search. Tundra again went out slowly and located the decoy. Tundra stared at the decoy for a few seconds and again came all the way out of the room looking for Cpl. Baltzer. Cpl. Rux had the decoy show himself and make noise. Tundra then went back, but did not go through the cans. Eventually the decoy, Sgt. Birge, had to move one of the cans out of the way so Tundra would engage. Even after engaging Tundra would release the bite anytime the decoy would make any loud noises or bang into the garbage cans.

My suggestion would be a period of additional training to work on the specific needs of the dog, mainly independence and confidence building. I also feel the dog would benefit from kept in a kennel and out of the handlers residence. This goes a long way towards creating independence and building drive.

Having said that I honestly do not think this is something that can be trained out of the dog. Although we could possibly make the dog look better in training scenarios it is my fear that if the dog is in a high pressure situation on a real call he will revert back to this behavior causing a real safety risk for Cpl. Baltzer.

Exhibit S

K-9 RETIREMENT AGREEMENT

The Pasco Sheriff's Office owns a German Shepherd dog known as "Tundra".

"Tundra" was assigned as a member of the K-9 Unit of the Pasco Sheriff's Office (PSO). His handler, Deputy Clifford Baltzer has recently been transferred out of the K-9 unit.

"Tundra" is unable to continue as a member of the K-9 Unit as a result of being unable to perform his current assigned duties, and he is unable to be retrained with another handler. These conditions are a result of handler dependency issues caused by Deputy Baltzer's insufficient training of "Tundra."

Sergeant Ben Birge has observed "Tundra's" condition and recommends the K-9's retirement.

"Tundra" can no longer provide service to the PSO and the people of Pasco County since he is unable to function as a police dog.

Deputy Clifford Baltzer has expressed a willingness to care for "Tundra" for the rest of his years.

WHEREAS it is in the best interest of the PSO, Deputy Clifford Baltzer and K-9 "Tundra", that "Tundra" is given to Deputy Clifford Baltzer.

IT IS THEREFORE agreed and understood that in exchange for his agreement to provide a home and proper care for K-9 "Tundra" for the rest of his life:

1. The PSO will transfer ownership of K-9 "Tundra" to Deputy Clifford Baltzer.
2. Deputy Clifford Baltzer will reimburse the Pasco Sheriff's Office the original purchase price for Tundra in the amount of \$8,500.00 (eight thousand five hundred dollars)
3. The PSO will discontinue all life insurance and liability policies on K-9 "Tundra."
4. Deputy Clifford Baltzer agrees to accept the ownership and care of K-9 "Tundra."
5. Deputy Clifford Baltzer agrees to accept all liability for K-9 "Tundra" from the date of this Agreement.
6. Deputy Clifford Baltzer will not be eligible for reimbursement of any costs associated

with food, veterinary care, or any other expenses related to K-9 "Tundra" from the Pasco Sheriff's Office nor the Pasco Sheriff's Charities.

Deputy Clifford Baltzer agrees to indemnify, hold harmless and defend the PSO from any liability caused by K-9 "Tundra" after the date of this Agreement.

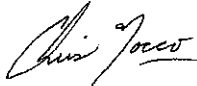
This constitutes the full and entire agreement between the PSO and Deputy Clifford Baltzer and supersedes any previous verbal agreements.

Executed this 29 day of November, 2018.

2018.12.04

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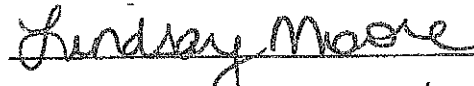
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By: 
Pasco Sheriff's Office

By: 
Deputy Clifford Baltzer

Title: Sheriff

WITNESS

By: 
Title: Bureau Chief/
General Counsel

WITNESS

By: 
Sergeant Ben Birge
Title: K-9 Unit Supervisor

Exhibit T

PASCO SHERIFF'S OFFICE

GENERAL ORDER

TITLE: MISCONDUCT INVESTIGATIONS AND
DISCIPLINARY PROCEDURES

GENERAL ORDER: 26.2

EFFECTIVE: DECEMBER 4, 2018

SUPERSEDES: SEPTEMBER 17, 2018

PAGES: 17

CONTENTS: This order consists of the following numbered sections:

- I. COMPLAINT RECEIPT AND DOCUMENTATION
- II. COMPLAINT INVESTIGATIONS FOR CIVILIAN MEMBERS
- III. PRELIMINARY INVESTIGATIONS FOR CERTIFIED MEMBERS
- IV. ADMINISTRATIVE INVESTIGATIONS
- V. AUTHORITY TO RELIEVE FROM DUTY
- VI. COMPLAINT INVESTIGATIONS FOR CERTIFIED MEMBERS
- VII. INVESTIGATIVE CONCLUSIONS
- VIII. REMEDIAL TRAINING
- IX. PRE-DISCIPLINARY HEARINGS
- X. NAME CLEARING
- XI. PROCESS OF APPEALS
- XII. CONFIDENTIALITY OF INVESTIGATIONS
- XIII. GLOSSARY

PURPOSE: To establish a system for receipt, investigation, and disposition of complaints of member misconduct.

SCOPE: This order applies to all members, as described therein.

DISCUSSION: Proper conduct promotes efficiency, coordination of effort, and public support. Misconduct must be met with fair and consistent administrative action.

POLICY: The Sheriff's Office will investigate all complaints against the agency and its members thoroughly, expeditiously and impartially according to the law and this order.

PROCEDURE:

I. COMPLAINT RECEIPT AND DOCUMENTATION:

- A. The Sheriff's Office will investigate all complaints of member misconduct.
- B. All members of the Sheriff's Office will forward citizen complaints of misconduct to the accused member's supervisor, the on duty supervisor, or the Professional Standards Unit Inspector.
- C. Complaints are sometimes based on misunderstandings of law or procedure rather than on member misconduct. When this occurs, the supervisor will attempt to clarify the applicable law or procedure, and make it understandable to the citizen. Written documentation is not necessary if the complaint is based on a misunderstanding, and is resolved to the complainant's satisfaction.
- D. The agency is required to investigate and resolve all complaints of misconduct.
 - 1. Citizens alleging member misconduct will be encouraged to complete and sign a Statement of Complaint form [PSO 1-0092]. The supervisor will investigate the complaint as outlined in Section II, III, and VI, as appropriate.
 - 2. When a citizen alleges member misconduct, but does not wish to file a formal complaint or become further involved with the investigative process, the supervisor will attempt to have the citizen sign an Informal Resolution of Complaint Form [PSO 1-0096]. The signing of this form does not automatically end the investigative portion of the process. It merely documents the citizen's choice to not pursue a formal complaint.
- E. Members receiving complaints will document the information on a Statement of Complaint form [PSO 1-0092] and forward it, via the chain of command, to the accused member's supervisor, or to the Professional Standards Unit supervisor. The supervisor will complete a Complaint Investigation Report (CIR), [PSO 1-0094], on all valid complaints of misconduct. Separate CIR's and files are initiated for each accused member involved in the complaint, and each CIR is attached as a cover sheet on the complaint file.
- F. When a supervisor is the complainant, a CIR [PSO 1-0094], along with a Statement of Complaint [PSO 1-0092] is completed detailing the allegation. These forms will be made part of the investigative packet.
- G. The complainant will receive a status report of the investigations progress within forty-five days from the date the complaint is received.
- H. The complainant will be notified in writing of the disposition of the complaint upon conclusion of the investigation. The notification will be documented and maintained in the investigative file. [CALEA 52.1.5 c] [CFA 27.01 C]
- I. The Professional Standards Unit (PSU) is responsible for recording, registering, and con-

trolling alleged or suspected misconduct complaints against the agency and its members, and for maintaining the confidentiality of administrative investigation files and storing in a secure area. (CALEA 52.1.10) (CFA 27.01 A)

J. The Professional Standards Unit Inspector is directly responsible for the administrative investigation function and reports directly to the Chief Deputy.

1. Professional Standards Unit Investigators are responsible for the administrative investigation of complaints and have full authority to discharge this responsibility.
2. Professional Standards Unit Investigators will be provided access to all Sheriff's Office facilities, equipment, and records as directed by the Sheriff.
3. Members will cooperate with and assist professional standards investigators conducting administrative investigations.

K. The Professional Standards Unit Inspector will keep the Chief Deputy informed of active investigations. In the event of a major incident, such as a deputy-involved shooting, the Chief Deputy will be notified immediately by telephone. [CALEA 52.1.3]

L. No member who is a participant in an internal investigation will reveal information pertaining to the investigation before it becomes public record [CFA 27.01B]

II. COMPLAINT INVESTIGATIONS FOR CIVILIAN MEMBERS:

A. Supervisors will immediately notify CID and the Professional Standards Unit when a criminal allegation is made against any member of the Pasco Sheriff's Office. Supervisors should avoid investigative actions or interviews that might jeopardize a subsequent criminal investigation.

B. Supervisors who receive non-criminal complaints about a civilian member will conduct a fair and thorough inquiry/investigation to determine if the complaint is valid. Supervisors may interview the civilian subject member at any time during the inquiry/investigation. Due to the fact that civilian members are not covered under the Officer Bill of Rights as described in F.S. 112.532, all civilian members will be afforded the rights of Due Process as described in the 14th Amendment of the United States Constitution. The member will be provided with a Civilian Member Notice of Investigation [PSO #10093C].

C. Minor complaints of misconduct are generally investigated at the district/division level and may include:

1. Minor violations of policies and procedures;
2. Allegations of rudeness to citizens;
3. Insubordination; or

4. Tardiness or dilatory (slow to act, procrastination) behavior.

D. When the supervisor's investigation reveals that the complaint is unfounded, unsubstantiated, exonerated or exonerated due to lack of policy, the supervisor will document his or her findings on a CIR, with all documentation attached, and forward the finding to the bureau commander. Supervisors will document their investigative efforts and reasoning behind their finding on a Professional Standards Memorandum.

E. A performance deficiency may be based on a citizen's complaint or member observation. A Performance Observation Report (POR) may be used when training or coaching is the appropriate manner for resolution of a complaint involving a minor deficiency in a member's job performance, as outlined in General Order 35.1.

F. A POR used to resolve a performance deficiency will be maintained at the bureau or command level. A POR *will not* be accepted in the Professional Standards Unit for the purpose of discipline, nor documented in the Professional Standards files. This section does not prohibit the Professional Standards Unit from requesting a copy of a POR when this documentation is related to a pending administrative investigation.

G. When the supervisor's investigation reveals the allegation will result in corrective action (i.e., letter of counseling/reprimand) if sustained, the supervisor will complete the CIR and investigation, with preliminary finding and recommended discipline. Supervisors will document their investigation on a Professional Standards Memorandum. All documentation shall be attached and forwarded to the bureau commander for review. Should there be more than one violation of policy and procedure, a separate CIR will be completed for each violation.

1. Members are entitled to provide a response in the member's statement area of the CIR. Member statements will be completed before submission to the bureau commander.

2. The member's bureau commander will forward the documentation to the Professional Standards Unit for filing.

H. If during the supervisor's investigation/inquiry it is discovered that a lengthy or complicated investigation is needed, or that the allegation may result in disciplinary action if sustained, the supervisor will forward all documentation to the bureau commander for review. A copy of the CIR will be sent to the Professional Standards Unit supervisor.

I. If the bureau commander determines, based on the information received, that the allegation will result in informal discipline if sustained, the documentation will be returned to the member's supervisor or to the Professional Standards Unit for investigation. If the case is referred back to the supervisor for investigation, the supervisor will be required to memorialize all subject member statements and all witness statements via an audio recording, written statement, or Professional Standards Memorandum.

J. Allegations that would result in formal discipline if sustained, or those outlined in Section III, will be referred to the Professional Standards Unit for review and will generally be assigned to this unit for investigation.

III. PRELIMINARY INVESTIGATIONS FOR CERTIFIED MEMBERS:

A. When a supervisor receives a complaint pertaining to a certified member, the supervisor should conduct an initial inquiry to determine if there are facts and circumstances which support the validity of the complaint. A supervisor may interview witnesses and should review all available information related to the allegation against the certified subject member. If appropriate, a supervisor may speak with the subject member about the allegation. However, the supervisor should proceed cautiously when interviewing a subject member if there is a possibility that the allegation against them, if sustained, could result in informal or formal discipline. All the principles outlined in F.S. 112.532-534 (Officer Bill of Rights) should be considered when a supervisor receives and addresses a complaint against a certified member.

B. Prior to commencement of a formal investigation, a subject member may be instructed to submit a written response or explanation of an incident or allegation in lieu of an interview, or before an investigative interview, for purposes of preliminary fact-finding. However, the memorandum should not be interrogatory (see definition in glossary for clarification).

C. Minor complaints of misconduct are generally investigated at the district/division level and may include:

1. Minor violations of policies and procedures;
2. Allegations of rudeness to citizens;
3. Insubordination; or
4. Tardiness or dilatory behavior.

D. If the initial inquiry reveals that the complaint is unfounded, unsubstantiated, exonerated or exonerated due to lack of policy, the supervisor will document his findings on a CIR, with all documentation attached, and forward the finding to the bureau commander. Supervisors will document their investigative efforts and reasoning behind their finding on a Professional Standards Memorandum.

E. A performance deficiency may be based on a citizen's complaint or member observation. A Performance Observation Report (POR) may be used when training or coaching is the appropriate manner for resolution of a complaint involving a minor deficiency in a member's job performance, as outlined in General Order 35.1.

F. A POR used to resolve a performance deficiency will be maintained at the bureau or command level and will result in no entry into the member's Professional Standards file. A POR

will not be accepted in the Professional Standards Unit for the purpose of discipline nor documented in the Professional Standards files. This section does not prohibit the Professional Standards Unit from requesting a POR, or any other documentation, which pertains to an active administrative investigation.

G. When the initial inquiry reveals the allegation will result in corrective action if sustained, the supervisor will complete the CIR and investigation, with preliminary finding and recommended administrative response. All documentation shall be attached and forwarded to the bureau commander for review. Should there be more than one violation of policy and procedure, a CIR will be completed for each violation.

1. Members are entitled to provide a response in the member's statement area of the CIR. Member statements will be completed before submission to the chain of command.
2. The member's bureau commander will forward the documentation to the Professional Standards Unit for filing.

H. If the initial inquiry reveals the allegation needs further investigation and/or may result in disciplinary action, the supervisor will forward all documentation to the bureau commander for review. A copy of the CIR will be sent to the Professional Standards Unit supervisor.

I. If the bureau commander determines, based on the information received, that the allegation will result in informal discipline if sustained, the documentation will be returned to the member's supervisor or to the Professional Standards Unit for investigation. If the complaint is referred to the supervisor, the supervisor will proceed following the investigative steps outlined in Section VI, A-U.

J. Allegations that would result in formal discipline if sustained, or those outlined in Section IV, will be referred to the Professional Standards Unit for review and will generally be assigned to this unit for investigation.

IV. ADMINISTRATIVE INVESTIGATIONS: Administrative investigations will be conducted in conformance with Florida law and current policies and procedures of the Sheriff's Office.

- A.** Complaints which require review and/or investigation by the Professional Standards Unit include the following:
1. Complaints alleging corruption, untruthfulness, violation of civil rights, sexual harassment, and incidents of excessive use of force.
 2. Matters that require confidential investigation.
 3. Time-consuming investigations that would be impractical to assign within the bureau or command.
 4. Incidents involving persons from more than one bureau or command.

5. Complaints alleging violations or nonconformance to laws.
 6. Incidents involving escape or death of persons in custody.
 7. Any administrative investigations at the direction of the Sheriff.
- B.** Members will be notified if they are the subject of an administrative investigation. The Investigator will provide the member a written statement of the allegations and information concerning the member's rights and responsibilities relative to the investigation. When confidentiality is necessary because of the sensitivity of the investigation, the member will not be notified until immediately before the initial interview. [CALEA 52.1.6] [CFA 27.02].
- C.** Complaints of criminal violations will be referred to the Investigative Division for investigation.
- D.** Members under investigation are required to answer all questions related to the performance of their duties. Failure to answer such questions may result in disciplinary action, including dismissal. However, information obtained through compelled statements may not be used in future criminal prosecutions, unless the member violates Florida Statute 837.012 Perjury.
- E.** The member's immediate family will not be required to give statements in administrative investigations, but may volunteer such statements.
- F.** Members will not be compelled to submit to a device measuring truth responses during questioning. However, the member may request such a test voluntarily. [CFA 27.04 E]
- G.** Administrative investigations are to be completed and the member advised in writing of the Bureau Commander's intent to proceed with disciplinary action, along with a proposal of the action sought within 180 days. However, the time limitations may be tolled as outlined in Florida Statute 112.532 Law Enforcement Officers' and Correctional Officers' Rights [CALEA 52.1.4; 52.1.5 b]

V. AUTHORITY TO RELIEVE FROM DUTY:

- A.** The Sheriff, or his designee, may relieve any member of duty and place them on Administrative Leave, with or without pay. As soon as practical, the Human Resources Director will be notified and an action form [PSO 1-0006] will be issued as written notice to the member. The member's Bureau Commander or designee will immediately notify the Teletype Manager or the Manager's Alternate Point of Contact (POC) of the member's status for DHSMV access purposes.
- B.** An immediate supervisor may relieve a member of official duties and place the member on administrative leave with pay under the following circumstances:

1. Following insubordinate or other improper conduct, which adversely affects the operation of the Sheriff's Office; or,
 2. When an allegation of misconduct is raised and it is in the best interest of the agency and/or public; or,
 3. When a member's ability to perform the functions of his or her position are in question.
- C. A supervisor, who relieves a member of duty, will notify his or her chain of command as soon as possible.
- D. Members relieved of official duties may be:
1. Placed on administrative assignment;
 2. Placed on administrative leave with pay and told to report by phone at certain times each day for possible assignment or interviews; or,
 3. Placed on administrative leave without pay.
- E. Members placed on administrative assignment will surrender any assigned vehicle, but will receive full pay and benefits and not lose any vested rights.
- F. Members placed on administrative leave with pay may be required to surrender their fire-arm, agency credentials, keys, a vehicle and/or other agency property. When placed on administrative leave with pay, the member's schedule will be 0800 – 1700 hours Monday through Friday, and the member is expected to be available for immediate recall during those hours.
- G. Members placed on administrative leave without pay will surrender their badge, weapon, commission card, and Sheriff's Office vehicle. This provision may be applied to members who are placed on administrative leave with pay, if deemed appropriate.
- H. Members will not wear the official uniform, or other articles of clothing that identifies the person as a member of the Sheriff's Office, while under disciplinary suspension or while on administrative leave. Exceptions to this provision must be approved by the Sheriff.

VI. COMPLAINT INVESTIGATION FOR CERTIFIED MEMBERS:

Supervisors will immediately notify CID and the Professional Standards Unit when a complaint classified as a criminal allegation is made against any member of the Pasco Sheriff's Office. Supervisors should avoid investigative actions or interviews that might jeopardize any subsequent criminal investigation. CID is the only division authorized to conduct criminal investigations involving members of the Pasco Sheriff's Office. The Professional Standards Unit is the only unit authorized to conduct administrative investigations relating to criminal allegations.

All the principles of the Officer Bill of Rights, as outlined in F.S. 112.532, will be followed when investigating an allegation/complaint that if sustained, may result in disciplinary action. If a certified member waives his or her rights under the Officer Bill of Rights, all waivers must be in writing. Whenever a certified member is under investigation and subject to interrogation by members of his or her agency for any reason that could lead to disciplinary action consisting of dismissal, demotion, transfer, reassignment, or other personnel action that might result in a loss of pay or benefits or that might otherwise be considered a punitive measure, the interview will be conducted under the following conditions:

- A.** If not a criminal allegation, supervisors conducting an investigation will meet with the complainant, when possible, and obtain a signed Statement of Complaint [PSO 1-0092] documenting the main issues of the complaint.
- B.** The interrogation shall be conducted at a reasonable hour, preferably at a time when the law enforcement officer or correctional officer is on duty, unless the seriousness of the investigation is of such a degree that immediate action is required.
- C.** The interrogation shall take place either at the office of the command of the investigation officer or at the district office, police unit, or detention unit in which the incident allegedly occurred.
- D.** The investigating supervisor will notify the subject member under investigation of the nature of the complaint and identify all complainants before commencing the interview. All identifiable witnesses shall be interviewed, whenever possible, prior to the beginning of the interview of the accused certified member. All witness statements shall be memorialized via an audio recording, written statement, or Professional Standards Memorandum. The complaint, all witness statements, including all other existing subject member statements, and all other existing evidence, including, but not limited to, incident reports, GPS locator information, and audio or video recordings relating to the incident under investigation, must be provided to the member who is the subject of the complaint before the beginning of any investigative interview of that certified subject member. A certified subject member, after being informed of the right to review witness statements, may voluntarily waive the provisions of this paragraph and provide a voluntary statement at any time.
- E.** To assist the investigating supervisor to comply with this general order, the supervisor will complete, and the member will acknowledge, a Notice of Investigation [PSO 1-0093]. This notice must be given to the certified subject member prior to the investigative interview.
- F.** During any investigative interrogation, all questions directed to the member will be asked by or through one interrogator, unless specifically waived by the member under investigation.
- G.** Supervisors conducting investigations will question subject members at a Sheriff's Office facility during duty hours, unless the seriousness of the allegation warrants immediate action.

H. Subject members may have a representative present during any interview relating to charges that, if sustained, will result in discipline. A representative may advise and counsel the member, but may not participate in the interview.

I. The subject member may review the complaint and all statements, regardless of form, made by the complainant and witnesses immediately prior to the beginning of the investigative interview. If a witness to a complaint is incarcerated and may be under the supervision of, or have contact with, the member under investigation, only the names and written statements of the complainant and non-incarcerated witnesses may be reviewed by the member under investigation.

J. Interviews with subject members will be audio recorded. The investigating supervisor will begin the interview with the introductory statement on the reverse side of the Notice of Investigation Form. The interview, including all recess periods, will be recorded. There will be no unrecorded questions or statements during the interview. Upon the request of the interviewed member, a copy of any recorded interview will be made available to the interviewed member within 72 hours, excluding holidays and weekends.

K. Members under investigation (subject members) are required to answer all questions related to the performance of their duties. Failure to answer questions related to the performance of duties may result in disciplinary action, *including dismissal*. However, no information obtained through the compelled statement may be used in any future criminal prosecution, unless the member violates FS 837.012, Perjury. Questions should be specific and narrowly related to the member's duties. If a member refuses to answer, the matter should be referred to the Professional Standards Unit.

L. Members under investigation will not be subjected to offensive language, or threatened with transfer, dismissal, or disciplinary action.

M. Sheriff's Office members may be required to submit to tests and other investigative methods. The member may also request any of the following tests be administered at the member's expense. These tests will be coordinated through the Professional Standards Unit.

N. Members may be required to submit to:

1. Lineups;
2. Photographs;
3. Medical or laboratory examinations, including blood, urine, and breath tests;
4. Voice prints (other than deception tests);
5. Handwriting exemplars;
6. Financial disclosure statements; and,

7. Other tests or examinations, when there is reasonable suspicion to believe the results will disclose an administrative violation.

8. Members will not be compelled to submit to a device measuring truth responses during questions. However, the member may request such a test voluntarily. [CFA 27.04 E]

O. Sheriff's Office or county-owned property may be searched at any time under conditions permitted by law.

P. Personal property in any Sheriff's Office facility or vehicle may be searched, subject to the limitations of the Fourth Amendment, U.S. Constitution.

Q. Sheriff's Office communications equipment may be monitored at any time under conditions permitted by law. Other communications or conversations may also be monitored under conditions permitted by law.

R. Supervisors are encouraged to contact the Professional Standards Unit for investigative advice and techniques, and interpretations of applicable rules and regulations.

S. When corrective/disciplinary action is contemplated, supervisors should contact the Professional Standards Unit for:

1. Summary of the subject member's complaints, investigations, disciplinary/corrective action history.
2. Past corrective/disciplinary parameters for similar incidents.

T. Supervisors may seek advice from the Sheriff's General Counsel for:

1. Legal sufficiency and defense.
2. Applicability of rules, regulations, policies, procedures, and law as to the facts.

U. Supervisors conducting administrative investigations will document their investigation on a Professional Standards Memorandum.

V. If the initial inquiry reveals the allegation needs further investigation and/or may result in disciplinary actions, the supervisor will forward all documentation to the bureau commander for review. A copy of the CIR will be sent to the Professional Standards Unit Inspector.

W. If the bureau commander determines, based on the information received, that the allegation will result in informal discipline if sustained, the documentation will be returned to the member's supervisor or to the Professional Standards Unit for investigation. If the complaint is referred to the supervisor, the supervisor will proceed following the investigative steps outlined in Section VI A-U.

X. Allegations that would result in formal discipline if sustained or those outlined in Section IV, B will be referred to the Professional Standards Unit for review and will generally be assigned to this unit for investigation.

VII. INVESTIGATIVE CONCLUSIONS:

A. Whomever is designated as the “reviewer” on a subject member’s “Member Performance Report,” in consultation with the member’s immediate supervisor, will submit a preliminary finding and recommended discipline to their bureau commander.

B. The appropriate commander will review and make a final determination. The completed investigative files will be forwarded to the Professional Standards Unit for filing within 15 days. Extensions may be granted by the Sheriff. [CALEA 52.1.9]

C. The bureau commander’s final determination may include the following:

1. Counseling: Counseling may be done through verbal, written, or other approved agency methods.
2. Letter of Reprimand: Letters of reprimand may be given in association with sanctions. Sanctions include, but are not limited to:
 - a. Loss of “take home” car privileges;
 - b. Loss of “extra duty work” privileges;
 - c. Loss of “trainer,” or “instructor” status;
 - d. Loss of assignment to specialty duties, or
 - e. Reassignment.
3. Suspension
4. Demotion
5. Dismissal

D. If Counseling or a Letter of Reprimand is the final determination, the bureau commander will issue the letter to the member and the file will be forwarded to the Professional Standards Unit for filing.

E. The member will be asked to sign the original letter to acknowledge receipt. The supervisor will send a copy of the signed letter to the Professional Standards Unit. The member will retain the original letter.

F. If the final determination is suspension, demotion, or dismissal, the bureau commander will provide the member with notice of a pre-disciplinary hearing. The notice will include the bureau commander's intent to proceed with disciplinary action, along with a proposal of the action sought. In compliance with the Officer Bill of Rights, the notice will be completed within 180 days after the date the agency received notice of the alleged misconduct, if required by law.

G. If the member resigns prior to the completion of the investigation, the investigation will be completed to its logical conclusion and submitted for final determination.

H. If the case was investigated by Professional Standards, the case file will be forwarded to the bureau commander, who will proceed as outlined in this general order.

I. The entire file will be returned to the Professional Standards Investigator if additional investigation is required. The investigator will complete an addendum to the investigation and resubmit the file.

J. If additional charges not listed on the original complaint are uncovered by the investigator, the file will be referred to the Professional Standards Inspector. The Inspector will be listed as the complainant, and will authorize the continued investigation of any new alleged infraction after consultation with the Chief Deputy, if deemed necessary.

VIII. REMEDIAL TRAINING:

A. Remedial training can be used in conjunction with other forms of corrective action or discipline.

B. Any recommended remedial training shall be coordinated and facilitated by the Training Section.

C. Completion of recommended remedial training is mandatory, and failure to do so may result in further disciplinary action.

IX. PRE-DISCIPLINARY HEARINGS:

A. Prior to a final determination in cases that may result in formal or informal discipline, all members will be afforded the opportunity to appear in person at a pre-disciplinary hearing before the bureau commander or designee, and the Human Resources Director. This is not an appeal process to challenge the appropriateness of sustained allegations. The member may introduce additional evidence or offer mitigating circumstances on their behalf.

1. Members may submit a written statement in lieu of a personal appearance at a hearing. This statement will be included in the file.

2. Members who indicate their choice for a hearing and do not appear or give notice or cause, will not be penalized.

3. All pre-disciplinary hearings will be audio recorded. There will be no unrecorded questions or statements during the hearings. Upon the request of the member, a copy of any recorded hearing will be made available to the member within 72 hours, excluding holidays and weekends.

4. The bureau commander/designee will review all documentation provided and make a final determination.

B. Members' Right to Representation: Members may have a representative present to advise and counsel them during the hearing.

C. Bureau Commanders' Findings and Disposition:

1. If the Sheriff concurs with the bureau commander's determination that the allegation is unfounded, unsubstantiated, exonerated, or exonerated due to policy failure, the member will be notified in writing by the bureau commander.

2. If the Sheriff concurs with the bureau commander's determination that informal disciplinary action will be taken, the bureau commander will notify the member with written confirmation of the final determination and initiate the disciplinary action.

3. If the Sheriff concurs with the bureau commander's determination that formal disciplinary action is required, the bureau commander will notify the member with written confirmation of the final determination and initiate the disciplinary action.

4. The bureau commander will prepare and sign letters of final determination, except notifications of dismissal, which are signed by the Sheriff. A notification of dismissal will contain the following:

- a. A statement documenting the reason for the dismissal;
- b. An effective date of the dismissal; and
- c. A statement stating that copies of supporting documentation relating to the dismissal are available from Professional Standards.

5. When a member is terminated from employment as a result of a misconduct investigation, the Human Resources Section will mail a letter informing the former member of his or her fringe and retirement benefits after dismissal. A copy will be placed in the member's personnel file.

6. All documentation and completed case files, including letters of final determination, will be forwarded to the Professional Standards Unit for final processing and filing. Original audio and video recordings will be forwarded to the Professional Standards Unit to become part of the permanent file.

X. NAME CLEARING:

A. An individual who has been terminated will be granted the opportunity to provide a name clearing statement to refute or explain the reasons for the dismissal. This may consist of a meeting with the bureau commander or designee, Human Resources Director, or the opportunity to provide a written statement within 10 days of receipt of notification of termination. All name clearing statement meetings will be audio recorded.

B. Notification is made by certified, return receipt mail, or personal delivery to the accused. The return receipt or signed acceptance is required and is made part of the case file.

C. The Professional Standards Unit maintains name clearing statement meeting recordings and/or documentation. A copy will also be placed in the member's personnel file.

XI. PROCESS OF APPEALS:

A. Corrective Action: Members may appeal corrective actions to the appropriate commander.

B. Informal Disciplinary Action: A member may appeal directly to the Chief Deputy. The member must submit a memorandum to the Chief Deputy detailing the reason for the appeal, within three workdays after receiving notification of final determination. The memorandum will be routed to the Professional Standards Unit Inspector, not through the chain of command.

1. The Professional Standards Unit Inspector, or a designee, will deliver all documents to the Chief Deputy.

2. The Chief Deputy will respond in writing within ten workdays, outlining his decision on the appeal. A copy of the Chief Deputy's decision, which is binding and final, will be forwarded to the Professional Standards Unit to become part of the permanent file.

C. Formal Disciplinary Action: Refer to the Pasco County Ordinance indexed as Career Service.

XII. CONFIDENTIALITY OF INVESTIGATIONS: No member who is a participant in an internal investigation will reveal information pertaining to the investigation before it becomes public record. [CFA 27.01 B]

XIII. GLOSSARY:

ADMINISTRATIVE INVESTIGATION - The detailed, systematic, objective, and impartial method of investigating complaints of inappropriate behavior to determine if a violation of Sheriff's Office administrative rules, orders, directives, or procedures has been committed by a Sheriff's Office member.

COMPLAINT OF MISCONDUCT - An accusation or charge accusing a member of the Sheriff's Office of violating a policy, procedure, rule or regulation. This DOES NOT INCLUDE citizen

complaints or grievances that result from a complainant's misunderstanding or disagreement with the application of law or Sheriff's Office policies or procedures.

CORRECTIVE ACTION - Action intended to modify or improve behavior and elicit compliance with established policies and procedures, e.g., Counseling, Letter of Reprimand.

COUNSELING - A documented discussion between a supervisor and subordinate in which the subordinate's improper behavior and necessary improvements are brought to their attention. Generally, counseling is used after informal supervisor/subordinate communication has failed to produce the desired results.

EXONERATED - A finding or conclusion the incident occurred (as described in the allegation), but the individual's actions were lawful and proper.

EXONERATED DUE TO POLICY FAILURE - A finding or conclusion that present policy, procedure, rules or regulations failed to address the issue in question. In all cases involving a finding of Exonerated Due to Policy Failure, the person making the finding will initiate a review of the policy in question and draft a recommendation to resolve the failure.

FORMAL DISCIPLINARY ACTION - Action resulting in the loss of pay or benefits resulting in a suspension of three days or more, demotion of more than one rank, or dismissal.

INFORMAL DISCIPLINARY ACTION - Action resulting in suspension of two days or less, or demotion of one rank.

INITIAL INQUIRY aka ADMINISTRATIVE INQUIRY - The preliminary review of an incident or situation to determine if an improper action may have been committed by the agency or one of its members. If information is revealed that supports an allegation of misconduct, an administrative investigation will be initiated.

INTERROGATORY MEMO - A supervisory request for a memorandum may be considered interrogatory when the supervisor provides a subject member with specific instruction on how to complete the memorandum, or directs the subject member to answer specific questions when completing the memorandum.

LETTER OF REPRIMAND - An official censure of unacceptable acts or behavior, which is administered in a positive manner. It will be made clear to the member that the behavior for which the reprimand was given will not be tolerated, and stronger administrative action(s) will be taken if the behavior reoccurs.

PERMANENT MEMBERS - Career Service classified members who have completed their probationary period.

PRE-DISCIPLINARY HEARING - An avenue for a member to meet with the bureau commander during which mitigating circumstances can be asserted before the possible imposition of disciplinary action.

SUSTAINED - A finding or conclusion that an allegation is supported by a preponderance of evidence.

UNFOUNDED - A finding or conclusion that an allegation is demonstrably without basis.

UNSUBSTANTIATED - A finding or conclusion that sufficient credible evidence was lacking to prove or disprove the allegation.

INDEXING:

COMPLAINT INVESTIGATION REPORT

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MISCONDUCT INVESTIGATIONS AND DISCIPLINARY PROCEDURES

REPRIMAND

REMEDIAL TRAINING

STATEMENT OF COMPLAINT

DRAFTED: LAM/November 29, 2018/Filed: 26.2 Misconduct Investigations and Disciplinary Procedures

APPROVED:

CHRIS NOCCO, SHERIFF
PASCO COUNTY, FLORIDA

DATE

Exhibit U

**PASCO SHERIFF'S OFFICE
COURT SERVICES BUREAU DIRECTIVE**

TITLE: **GRIEVANCE PROCEDURES**

BUREAU DIRECTIVES: **555.08**

EFFECTIVE: **July 26, 2017**

SUPERCEDES: **May 27, 2016**

**ACCREDITATION
STANDARD:** **FCAC 7.04, 11.14M**

PAGES: **3**

CONTENTS: This order consists of the following sections:

- I. GRIEVANCE FORM
- II. GRIEVANCE PROCESS

PURPOSE: To establish a formalized inmate grievance procedure.

SCOPE: This directive applies to all members.

DISCUSSION: Inmates have the right to file grievances (complaints involving alleged abuse, harassment or abridgement of civil rights) and members provide assistance whenever needed. The grievance procedure is the means of determining whether or not any specific complaint falls within the foregoing definition of a grievance.

POLICY: It is the policy of this bureau that a written inmate grievance procedure is available to all inmates and includes at least one level of appeal.

PROCEDURE:

GRIEVANCE FORM:

A. Transmittal - A grievance is generated by the inmate in the form of a written statement on a *Request for Administrative Remedy* [PSO 4-0027] or electronically within 3 days following an incident. An inmate found guilty of a rule violation has an opportunity to appeal the disciplinary sanctions imposed by submitting a grievance within 3 days of being found guilty. The 3-day submission restriction for submitting grievances does not apply for reporting sexual abuse.

CSBD 555.08

B. Contents - Grievances will include the time, date, names of deputies and/or staff members involved, and pertinent details of the incident being grieved, including names of any witnesses.

C. Submission - The Support Services Sergeant/designee will pick up grievances from the housing units and review the electronic grievances at least once weekly. The Support Services Sergeant is responsible for assigning grievances to the respective shift/section commanders to be investigated. The inmate is provided a receipt portion of the form.

II. GRIEVANCE PROCESS:

A. Review - Upon receipt of a grievance by the Support Services Sergeant, bureau captains or designee, the grievance will be reviewed and determine if:

1. The grievance concerns an alleged prohibited act by a staff member.
2. There was a violation of the inmate's civil rights.
3. A criminal act was committed.
4. An abridgement of the inmate's privileges, as cited in the Inmate Rules and Informational Posting, occurred.

B. If the grievance constitutes an inmate request for service, or comments regarding a denial of privileges not described in the Inmate Rules and Information Posting, the grievance will not be accepted. The grievance will be returned to the housing unit deputy for action or returned to the inmate.

C. Investigation - The supervisor or shift/section commander will conduct an investigation to determine what action should be taken, if any.

D. Response - Any inmate who submits a grievance will promptly receive a response following the investigation, to include the findings and action taken.

1. Grievances alleging an inmate is subject to a substantial risk of imminent sexual abuse will be investigated within 12 hours from receipt of the grievance, and will be provided a response within 3 days, reference **CSBD 540.27 Prison Rape Elimination Act (PREA)**.

2. Grievances submitted on concerns not involving imminent risk, will conclude within (15) calendar days from date of receipts.

E. The Support Services Sergeant will maintain a file of all grievances and dispositions except medical complaints, which will be maintained by medical.

CSBD 555.08

F. Informal Resolutions - It is recommended to use the informal resolution method to solve a problem between inmates and staff. Generally, an informal resolution can resolve a complaint filed by the inmate. In the event a verbal or written complaint can be resolved, there is no need to file a formal grievance. If the inmate cannot find an informal solution and wishes to utilize the grievance procedure, the inmate will file a ***Request for Administrative Remedy*** [PSO 4-0027].

G. Notification- All inmates are advised of the grievance procedure in the Inmate Rules and Informational Posting and during the admission/orientation process.

H. In the event the inmate does not agree with the findings of the investigator or shift/section commander and wishes to appeal the grievance further, he/she will file an appeal to the division commander, who will investigate the inmate's complaint. The bureau commander's decision will be final.

I. Inmates should submit grievances involving medical issues in a sealed envelope to the housing deputy to place in the grievance box if a tablet is not available.

- 1.** The medical staff will maintain a grievance log on administrative remedies received.
- 2.** Responses to medical grievances are maintained in the inmate's medical chart. A copy will not be placed in the inmate's classification file.
- 3.** If the inmate places a medical grievance in the housing unit grievance box, unsealed, it may be viewed and/or responded to by non-medical members.

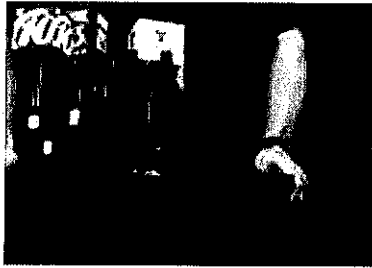
DRAFTED no/tb/07/26/17 /Filed: Grievance Procedures

APPROVED:

STACEY JENKINS, MAJOR DATE 07/26/17
COURT SERVICES BUREAU

Exhibit V

← Monica Duperon



has resigned and more shake-ups are likely after the Pasco County Sheriff's Office discovered supervisors failed to act in a case of a deputy tampering with evide...



Like



Comment



Share



2



Marco Mancinelli

Need sherif isreal to resign

1y

Like

Reply



2



Monica Duperon Sheriff Israel is in a differ...



Robert Haugh

The more I read the articles the more questions I have. It seems this guy had some sort of a relationship although they claimed there was no ongoing relationship... it's not was it was but what it wasn't if you follow me. Also, the evidence and backpack thing may end up not rising to a prosecuted case unless the agency forces it and then you have to ask why. Finally, that whole incident seems... See More

1y

Like

Reply



3



Marcia Koz Totally agree



Write a comment...



Exhibit W



CHRIS NOCCO, SHERIFF

OFFICE OF THE SHERIFF

TEAMWORK ♦ PROFESSIONALISM ♦ SERVICE

April 18, 2016

Received

Richard Bynum
8700 Citizen Drive
New Port Richey, FL 34654

APR 19 2016

Human Resources

Dear Sergeant Bynum:

This is to advise that effective Monday, April 18, 2016 in accordance with General Order 26.2, Section V,(D)(2), a copy of which is enclosed for your review, you have been placed on administrative leave with pay until further notice.

While out on administrative leave you will need to be available during normal business hours, Monday through Friday 8am to 5pm. You should not commit yourself to anything that could impact your availability. Should you need to take vacation or sick leave, approval must be submitted and granted by the Human Resources Director.

If you have any questions regarding this matter, please contact Lindsay Moore, Acting Human Resources Director at (727) 844-7701.

Sincerely,

Chris Nocco
Sheriff

CN/lam
cc: Major Eakley

RECEIVED:
Richard Bynum

Date: 09/18/2016

WITNESS:

(Print Name: Lt. Richard Scilox)

WITNESS :

(Print Name: John Collier)

PASCO SHERIFF'S OFFICE

Sheriff's Administration
8700 Citizens Drive
New Port Richey, FL 34654
727-847-5878

District I
7432 Little Road
New Port Richey, FL 34654
727-847-5878

District II
36409 State Road 52
Dade City, FL 33525
352-518-5000

District III
11530 Trinity Blvd
Trinity, FL 34655
727-372-5920

Pasco Detention Center
20101 Central Blvd
Land O' Lakes, FL 34637
813-996-6982

Exhibit X



CHRIS NOCCO, SHERIFF

OFFICE OF THE SHERIFF

TEAMWORK ♦ PROFESSIONALISM ♦ SERVICE

June 28, 2016

Richard Bynum
8700 Citizen Drive
New Port Richey, FL 34654

RE: Demotion

Dear Deputy Bynum,

This is to advise that effective Tuesday, June 28, 2016 in accordance with General Order 22.3, Conditions of Employment/Appointment, Section III(B), Probationary Period, you are hereby demoted from your position as a Sergeant, Law Enforcement to Deputy Sheriff.

As an employee whose promotion was in probationary status, you have no appeal rights through the Career Service Appeal Board.

Should you have any questions or need any additional information, please contact Robert Larsen at (727) 844-7791.

Sincerely,

Chris Nocco
Sheriff

RECEIVED:

Richard Bynum

DATE:

6-28-16

WITNESS:

CAPTAIN W.T. DAVIS 847

WITNESS:

Steve Eastmond

Print Name:

CAPTAIN W.T. DAVIS 847

Print Name:

Steve Eastmond

PASCO SHERIFF'S OFFICE

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