

IN THE CIRCUIT COURT OF THE
17th JUDICIAL CIRCUIT, IN AND FOR
BROWARD COUNTY, FLORIDA

ERROL LEATH,

Plaintiff,

CASE NO.:

v.

CITY OF FORT LAUDERDALE,
a municipal corporation located within
Broward County, a political subdivision of
the State of Florida, ELIEZER RAMOS,
STEVEN SMITH, EDUARDO REQUEJO,
MICHAEL LOPINOT, TODD HILL, and
MATTHEW EMALA,

Defendants.

COMPLAINT

COMES NOW the Plaintiff, ERROL LEATH, by and through his undersigned counsel, hereby sues the Defendants, CITY OF FORT LAUDERDALE, a municipal corporation located within Broward County, a political subdivision of the State of Florida, ELIEZER RAMOS, STEVEN SMITH, EDUARDO REQUEJO, MICHAEL LOPINOT, TODD HILL, and MATTHEW EMALA and alleges as follows:

Parties, Jurisdiction and Venue

1. This is an action for damages in excess of Fifty Thousand (\$50,000.00) Dollars, exclusive of attorneys' fees, interest and costs, and Plaintiff hereby demands a trial by jury; accordingly, although, to file this complaint, undersigned counsel is being required by order of the Supreme Court of Florida to contemporaneously complete a civil cover sheet with a dollar figure as an estimated amount of claim for data collection and clerical processing purposes only, the full monetary value of the damages suffered by Plaintiff is yet to be determined and will be decided in

a verdict by the jury that judges the facts of this action in compliance with Article I, Section 22, Florida Constitution.

2. At all times material hereto, Plaintiff, ERROL LEATH (hereinafter “LEATH” or “Plaintiff”), was and is over the age of eighteen and is otherwise *sui juris*.

3. At all times material hereto, Defendant, CITY OF FORT LAUDERDALE, was and is a municipal corporation that was created pursuant to the Constitution of the State of Florida and the Home Rule Charter of Broward County, FL.

4. CITY OF FORT LAUDERDALE has waived sovereign immunity pursuant to Florida Statute § 768.28.

5. LEATH has complied with Florida Statute § 768.28 (6) by mailing the attached letter to CITY OF FORT LAUDERDALE (Exhibit “A”) as a condition precedent to filing this action.

6. CITY OF FORT LAUDERDALE never made a final disposition of LEATH’s written claims within six (6) months of their presentation.

7. Proper notice has been sent to CITY OF FORT LAUDERDALE, an agency or subdivision of the State of Florida, and more than six (6) months has passed since the receipt of notification by the Defendant, and all other conditions precedent as set forth in Florida Statutes § 768.28 (6)(a) have been met. See attached Exhibit “A.”

8. LEATH has met all conditions precedent as forth in Florida Statute § 768.28 (6)(a). See Exhibit “A.”

9. At all times material hereto, ELIEZER RAMOS (hereinafter “RAMOS”) was an employee, law enforcement officer and agent of CITY OF FORT LAUDERDALE.

10. At all times material hereto, RAMOS was acting under color of state law, over 18 years of age and *sui juris*.

11. At all times material hereto, STEVEN SMITH (hereinafter "SMITH") was an employee, law enforcement officer and agent of CITY OF FORT LAUDERDALE.

12. At all times material hereto, SMITH was acting under color of state law, over 18 years of age and *sui juris*.

13. At all times material hereto, EDUARDO REQUEJO (hereinafter "REQUEJO") was an employee, law enforcement officer and agent of CITY OF FORT LAUDERDALE.

14. At all times material hereto, REQUEJO was acting under color of state law, over 18 years of age and *sui juris*.

15. At all times material hereto, MICHAEL LOPINOT (hereinafter "LOPINOT") was an employee, law enforcement officer and agent of CITY OF FORT LAUDERDALE.

16. At all times material hereto, LOPINOT was acting under color of state law, over 18 years of age and *sui juris*.

17. At all times material hereto, TODD HILL (hereinafter "HILL") was an employee, law enforcement officer and agent of CITY OF FORT LAUDERDALE.

18. At all times material hereto, HILL was acting under color of state law, over 18 years of age and *sui juris*.

19. At all times material hereto, MATTHEW EMALA (hereinafter "EMALA") was an employee, law enforcement officer and agent of CITY OF FORT LAUDERDALE.

20. At all times material hereto, EMALA was acting under color of state law, over 18 years of age and *sui juris*.

21. The incident sued upon occurred in Broward County, Florida.

Facts Common to All Counts

22. On or about July 19, 2023, LEATH, who cannot drive because of his epilepsy, was traveling on Broward County Bus #19.

23. At said time and place, members of the Fort Lauderdale Police Department's Fugitive Unit within the Violent Crimes Division, which consisted of Defendants RAMOS, SMITH, REQUEJO, LOPINOT, HILL, and EMALA (hereinafter known collectively as the "FUGITIVE UNIT") were searching for Daenon Malik King, an individual who was wanted for murder.

24. At said time and place, LEATH and Daenon Malik King did not look alike.

25. At said time and place, LEATH was 33 years old; Daenon Malik King was 40 years old.

26. At said time and place, LEATH weighed 180 lbs.; Daenon Malik King weighed 210 lbs.

27. At said time and place, LEATH did not have any tattoos; Daenon Malik King had multiple tattoos including the following: a lion with dreads and a basketball with "respect the game" on his upper right arm; a dragon, a hooded angel, and the words "dnice" on his left arm; and a Batman logo on his back.

28. At said time and place, LEATH's features, such as his eyes, nose, mouth, and facial structure, were completely different from Daenon Malik King.

29. At said time and place, LEATH had no criminal record.

30. At said time and place, LEATH had no warrant for his arrest.

31. At said time and place, the FUGITIVE UNIT was conducting surveillance in the area of NW 24th Street near State Road 7 in the City of Lauderdale Lakes, Florida.

32. At said time and place, believing LEATH to be their target, the FUGITIVE UNIT, having observed LEATH getting on the bus, followed the bus in unmarked police cars.

33. At said time and place, when the bus arrived at the bus stop located at or about 2912 N. State Road 7, Lauderdale Lakes, FL 33313, the FUGITIVE UNIT parked their unmarked police cars in front of and behind the bus at said bus stop.

34. At said time and place, after exiting their vehicles, the FUGITIVE UNIT descended upon the bus stop with tactical vests and rifles.

35. At said time and place, the FUGITIVE UNIT pointed their weapons in the direction of LEATH and the numerous other civilians exiting the bus at the bus stop.

36. At said time and place, the FUGITIVE UNIT at no point asserted who they were after; its first verbal contact was "Hey! You right there" to the general crowd of civilians, including LEATH.

37. At said time and place, as LEATH did not have a warrant for his arrest and had no reason to suspect that the police were looking for him, LEATH began to run away from the sights of the officers' guns as he believed he was in danger from some other individual in the area.

38. At said time and place, the FUGITIVE UNIT aggressively subdued LEATH with one officer executing a brutal full-body tackle, slamming his head into the ground, placing his full weight on LEATH's back, violently placing both hands around LEATH's neck, and putting LEATH's arms behind his back and into handcuffs.

39. At said time and place, LEATH repeatedly exclaimed "What did I do?" in fear and confusion as to why the FUGITIVE UNIT was restraining him.

40. At said time and place, while LEATH was on the ground and violently detained, the FUGITIVE UNIT took possession of LEATH's fanny pack and began to search through it.

41. At said time and place, an officer of the FUGITIVE UNIT found his identification, his epilepsy medication with his full name on it, and his Bible.

42. At said time and place, an officer of the FUGITIVE UNIT asked LEATH his name; he confirmed his name as Errol Leath.

43. At said time and place, an officer of the FUGITIVE UNIT began to uncuff LEATH and it was explained to LEATH that there was a mistake in arresting LEATH because he “looked identical” to the suspect Daenon Malik King.

44. At said time and place, LEATH was released and abandoned despite sustaining severe physical and mental trauma brought on by the FUGITIVE UNIT.

45. At said time and place, no officer on the FUGITIVE UNIT called for emergency services to check his vitals or conduct a wellness check.

Count I – False Arrest – City of Fort Lauderdale

46. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

47. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT falsely arrested and violently, willfully, intentionally, and recklessly detained LEATH on the presumption that he was Daenon Malik King, which was incorrect.

48. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT arrested LEATH without his consent and against his will.

49. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT knew or should have known that the arrest of LEATH was false and that no probable cause existed for his arrest.

50. At all time material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT's actions unlawfully detained and deprived LEATH of his liberty, were against LEATH's will, were

without legal authority or “color of authority,” and were unreasonable and unwarranted under the circumstances.

51. As a direct and proximate result of the false arrest and false imprisonment of LEATH, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

52. As a further direct and proximate result of his false arrest and false imprisonment, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, CITY OF FORT LAUDERDALE, for damages, costs and for such other relief as the court deems just and proper.

Count II – False Imprisonment – City of Fort Lauderdale

53. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

54. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT willfully and intentionally detained LEATH on the presumption that he was Daenon Malik King, which was incorrect.

55. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT detained LEATH without his consent and against his will.

56. At all times material hereto, the detention of LEATH was unlawful and without legal justification as the CITY OF FORT LAUDERDALE and the FUGITIVE UNIT did not have an arrest warrant for LEATH, but rather Daenon Malik King.

57. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT knew or should have known that the arrest of LEATH was false and that no probable cause existed for his arrest.

58. At all time material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT's actions unlawfully detained and deprived LEATH of his liberty, were against LEATH's will, were without legal authority or "color of authority," and were unreasonable and unwarranted under the circumstances.

59. As a direct and proximate result of the false imprisonment of LEATH, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

60. As a further direct and proximate result of his false imprisonment, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, CITY OF FORT LAUDERDALE, for damages, costs and for such other relief as the court deems just and proper.

Count III – Assault – City of Fort Lauderdale

61. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

62. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT commenced a course of conduct such that they intended to threaten the infliction of injury, harm, touch, apply force, and/or make contact with LEATH's body.

63. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT commenced a course of conduct that demonstrated to LEATH that they possessed the apparent ability to cause harm to LEATH and, as a result, LEATH reasonably feared that he was going to be the victim of imminent bodily harm or offensive contact.

64. As a direct and proximate result of the threatening of harm, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

65. As a further direct and proximate result of the threatening of harm, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, CITY OF FORT LAUDERDALE, for damages, costs and for such other relief as the court deems just and proper.

Count IV – Battery – City of Fort Lauderdale

66. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

67. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT commenced a course of conduct such that they intended to touch, strike, apply force, and/or make contact with LEATH's body and actually touched LEATH.

68. At all times material hereto, the contact was harmful or offensive and occurred without LEATH's consent.

69. At all times material hereto, CITY OF FORT LAUDERDALE and the FUGITIVE UNIT commenced a course of conduct such that their actions occurred with great force and excessive use of force causing LEATH severe bodily injury.

70. As a direct and proximate result of the excessive use of force, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

71. As a further direct and proximate result of the excessive use of force, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, CITY OF FORT LAUDERDALE, for damages, costs and for such other relief as the court deems just and proper.

Count V – Negligent Training – City of Fort Lauderdale

72. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

73. At all times material hereto, CITY OF FORT LAUDERDALE owed LEATH a duty (assumed, implied, non-delegable and otherwise) to train its employees how to do their jobs in a reasonably safe way.

74. CITY OF FORT LAUDERDALE breached that duty in these non-exclusive ways:

- a. Failing to train its employees, such as the FUGITIVE UNIT, properly in implementing a tactical plan;
- b. Failing to train its employees, such as the FUGITIVE UNIT, properly on identifying the correct suspect;
- c. Failing to train its employees, such as the FUGITIVE UNIT, properly in implementing a tactical plan only when a suspect's identity has been confirmed.
- d. Failing to train its employees, such as the FUGITIVE UNIT, properly in identifying themselves to a suspect;
- e. Failing to train its employees, such as the FUGITIVE UNIT, properly in using only the minimum amount of force necessary to apprehend a suspect;
- f. Failing to train its employees, such as the FUGITIVE UNIT, properly in exhausting every other reasonable means of apprehension before resorting to making physical contact with a suspect;

- g. Failing to train its employees, such as the FUGITIVE UNIT, to not use excessive force;
- h. Failing to train its employees, such as the FUGITIVE UNIT, properly in calling emergency services immediately after an incident; and
- i. Failing to train its employees, such as the FUGITIVE UNIT, properly in following the CITY OF FORT LAUDERDALE's policies and to not break the law (collectively "the dangerous conditions").

75. CITY OF FORT LAUDERDALE knew of the dangerous conditions, or they existed long enough that CITY OF FORT LAUDERDALE should have discovered them in exercising due care, or CITY OF FORT LAUDERDALE created the dangerous conditions.

76. As a direct and proximate result of CITY OF FORT LAUDERDALE's breach of duties, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

77. As a further direct and proximate result of CITY OF FORT LAUDERDALE's breach of duties, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, CITY OF FORT LAUDERDALE, for damages, costs and for such other relief as the court deems just and proper.

Count VI – Negligent Retention – City of Fort Lauderdale

78. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

79. At all times material hereto, CITY OF FORT LAUDERDALE owed LEATH a duty (assumed, implied, non-delegable and otherwise) to retain only those employees who were capable of doing their jobs in a reasonably safe way.

80. CITY OF FORT LAUDERDALE breached that duty in these non-exclusive ways:

- a. Retaining its employees, such as the FUGITIVE UNIT, when they were not properly trained in implementing a tactical plan;
- b. Retaining its employees, such as the FUGITIVE UNIT, when they were not properly trained on identifying the correct suspect;
- c. Retaining its employees, such as the FUGITIVE UNIT, when they were not properly trained in implementing a tactical plan only when a suspect's identity has been confirmed;
- d. Retaining its employees, such as the FUGITIVE UNIT, when they were not properly trained in identifying themselves to a suspect;
- e. Retaining its employees, such as the FUGITIVE UNIT, when they were not properly trained in using only the minimum amount of force necessary to apprehend a suspect;
- f. Retaining its employees, such as the FUGITIVE UNIT, when they were not properly trained in exhausting every other reasonable means of apprehension before resorting to making physical contact with a suspect;

- g. Retaining its employees, such as the FUGITIVE UNIT, when they were not properly trained to not use excessive force;
- h. Retaining its employees, such as the FUGITIVE UNIT, when they were not properly trained in calling emergency services immediately after an incident;
- i. Retaining its employees, such as the FUGITIVE UNIT, when they did not do their jobs properly; and
- j. Retaining its employees, such as the FUGITIVE UNIT, when they failed to perform their jobs reasonably under the circumstances (collectively “the dangerous conditions”).

81. CITY OF FORT LAUDERDALE knew of the dangerous conditions, or they existed long enough that CITY OF FORT LAUDERDALE should have discovered them in exercising due care, or CITY OF FORT LAUDERDALE created the dangerous conditions.

82. As a direct and proximate result of CITY OF FORT LAUDERDALE’s breach of duties, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

83. As a further direct and proximate result of CITY OF FORT LAUDERDALE’s breach of duties, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, CITY OF FORT LAUDERDALE, for damages, costs and for such other relief as the court deems just and proper.

Count VII – Negligent Supervision – City of Fort Lauderdale

84. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

85. At all times material hereto, CITY OF FORT LAUDERDALE owed LEATH a duty (assumed, implied, non-delegable and otherwise) to supervise its employees reasonably under the circumstances and to act with due regard for LEATH's safety and wellbeing.

86. CITY OF FORT LAUDERDALE breached that duty in these non-exclusive ways:

- a. Negligently supervising the employees working at the time of the incident;
- b. Negligently supervising the FUGITIVE UNIT's tactical plan and arrest of LEATH;
- c. Failing to take proper precautions to ensure that the FUGITIVE UNIT had the correct suspect;
- d. Failing to supervise the training of its employees, such as the FUGITIVE UNIT and others, on the CITY OF FORT LAUDERDALE's arrest policies and procedures;
- e. Failing to supervise the FUGITIVE UNIT in using only the minimum amount of force necessary to apprehend LEATH;
- f. Failing to supervise the FUGITIVE UNIT in exhausting every other reasonable means of apprehension before resorting to making contact with LEATH's person;
- g. Failing to call emergency services immediately after the incident;
- h. Failing to supervise and correct the lawless behavior of its employees; and

- i. Failing to act reasonably under the circumstances for LEATH's safety and wellbeing (collectively "the dangerous conditions").

87. CITY OF FORT LAUDERDALE knew of the dangerous conditions, or they existed long enough that CITY OF FORT LAUDERDALE should have discovered them in exercising due care, or CITY OF FORT LAUDERDALE created the dangerous conditions.

88. As a direct and proximate result of CITY OF FORT LAUDERDALE's breach of duties, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

89. As a further direct and proximate result of CITY OF FORT LAUDERDALE's breach of duties, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, CITY OF FORT LAUDERDALE, for damages, costs and for such other relief as the court deems just and proper.

Count VIII – Negligence – City of Fort Lauderdale

90. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

91. At all times material hereto, CITY OF FORT LAUDERDALE owed LEATH a duty (assumed, implied, non-delegable and otherwise) to act reasonably under the circumstances with regard to LEATH's safety and wellbeing.

92. CITY OF FORT LAUDERDALE breached that duty in these non-exclusive ways:

- a. Negligently initiating an improvised and poorly thought-out tactical plan;
- b. Failing to take proper precautions to ensure that the FUGITIVE UNIT had the correct suspect before initiating a tactical plan;
- c. Failing to terminate the arrest prior to making physical contact with LEATH;
- d. Arresting the wrong suspect;
- e. Failing to use only the minimum amount of force necessary to apprehend LEATH;
- f. Failing to supervise the FUGITIVE UNIT in exhausting every other reasonable means of apprehension before resorting to making contact with LEATH's person;
- g. Failing to call emergency services immediately after the incident;
- h. Failing to act reasonably under the circumstances for LEATH's safety and wellbeing; and
- i. Negligently causing LEATH physical and mental harm (collectively "the dangerous conditions").

93. CITY OF FORT LAUDERDALE knew of the dangerous conditions, or they existed long enough that CITY OF FORT LAUDERDALE should have discovered them in exercising due care, or CITY OF FORT LAUDERDALE created the dangerous conditions.

94. As a direct and proximate result of CITY OF FORT LAUDERDALE's breach of duties, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

95. As a further direct and proximate result of CITY OF FORT LAUDERDALE's breach of duties, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, CITY OF FORT LAUDERDALE, for damages, costs and for such other relief as the court deems just and proper.

Count IX – Assault – Eliezer Ramos

96. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

97. At all times material hereto, RAMOS commenced a course of conduct such that he intended to threaten the infliction of injury, harm, touch, apply force, and/or make contact with LEATH's body.

98. At all times material hereto, RAMOS commenced a course of conduct that demonstrated to LEATH that he possessed the apparent ability to cause harm to LEATH and, as a result, LEATH reasonably feared that he was going to be the victim of imminent bodily harm or offensive contact.

99. RAMOS acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

100. RAMOS' actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

101. As a direct and proximate result of the threatening of harm, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

102. As a further direct and proximate result of the threatening of harm, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, ELIEZER RAMOS, for damages, costs and for such other relief as the court deems just and proper.

Count X – Battery – Eliezer Ramos

103. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

104. At all times material hereto, RAMOS commenced a course of conduct such that he intended to touch, strike, apply force, and/or make contact with LEATH's body and actually touched LEATH.

105. At all times material hereto, the contact was harmful or offensive and occurred without LEATH's consent.

106. At all times material hereto, RAMOS commenced a course of conduct such that his actions occurred with great force and excessive use of force causing LEATH severe bodily injury.

107. RAMOS acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

108. RAMOS' actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

109. As a direct and proximate result of the excessive use of force, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

110. As a further direct and proximate result of the excessive use of force, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, ELIEZER RAMOS, for damages, costs and for such other relief as the court deems just and proper.

Count XI – Assault – Steven Smith

111. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

112. At all times material hereto, SMITH commenced a course of conduct such that he intended to threaten the infliction of injury, harm, touch, apply force, and/or make contact with LEATH's body.

113. At all times material hereto, SMITH commenced a course of conduct that demonstrated to LEATH that he possessed the apparent ability to cause harm to LEATH and, as a result, LEATH reasonably feared that he was going to be the victim of imminent bodily harm or offensive contact.

114. SMITH acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

115. SMITH's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

116. As a direct and proximate result of the threatening of harm, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

117. As a further direct and proximate result of the threatening of harm, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, STEVEN SMITH, for damages, costs and for such other relief as the court deems just and proper.

Count XII – Battery – Steven Smith

118. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

119. At all times material hereto, SMITH commenced a course of conduct such that he intended to touch, strike, apply force, and/or make contact with LEATH's body and actually touched LEATH.

120. At all times material hereto, the contact was harmful or offensive and occurred without LEATH's consent.

121. At all times material hereto, SMITH commenced a course of conduct such that his actions occurred with great force and excessive use of force causing LEATH severe bodily injury.

122. SMITH acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

123. SMITH's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

124. As a direct and proximate result of the excessive use of force, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

125. As a further direct and proximate result of the excessive use of force, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, STEVEN SMITH, for damages, costs and for such other relief as the court deems just and proper.

Count XIII – Assault – Eduardo Requejo

126. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

127. At all times material hereto, REQUEJO commenced a course of conduct such that he intended to threaten the infliction of injury, harm, touch, apply force, and/or make contact with LEATH's body.

128. At all times material hereto, REQUEJO commenced a course of conduct that demonstrated to LEATH that he possessed the apparent ability to cause harm to LEATH and, as a result, LEATH reasonably feared that he was going to be the victim of imminent bodily harm or offensive contact.

129. REQUEJO acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

130. REQUEJO's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

131. As a direct and proximate result of the threatening of harm, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

132. As a further direct and proximate result of the threatening of harm, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, EDUARDO REQUEJO, for damages, costs and for such other relief as the court deems just and proper.

Count XIV – Battery – Eduardo Requejo

133. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

134. At all times material hereto, REQUEJO commenced a course of conduct such that he intended to touch, strike, apply force, and/or make contact with LEATH's body and actually touched LEATH.

135. At all times material hereto, the contact was harmful or offensive and occurred without LEATH's consent.

136. At all times material hereto, REQUEJO commenced a course of conduct such that his actions occurred with great force and excessive use of force causing LEATH severe bodily injury.

137. REQUEJO acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

138. REQUEJO's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

139. As a direct and proximate result of the excessive use of force, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

140. As a further direct and proximate result of the excessive use of force, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition

and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, EDUARDO REQUEJO, for damages, costs and for such other relief as the court deems just and proper.

Count XV – Assault – Michael Lopinot

141. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

142. At all times material hereto, LOPINOT commenced a course of conduct such that he intended to threaten the infliction of injury, harm, touch, apply force, and/or make contact with LEATH's body.

143. At all times material hereto, LOPINOT commenced a course of conduct that demonstrated to LEATH that he possessed the apparent ability to cause harm to LEATH and, as a result, LEATH reasonably feared that he was going to be the victim of imminent bodily harm or offensive contact.

144. LOPINOT acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

145. LOPINOT's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

146. As a direct and proximate result of the threatening of harm, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

147. As a further direct and proximate result of the threatening of harm, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization,

medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, MICHAEL LOPINOT, for damages, costs and for such other relief as the court deems just and proper.

Count XVI – Battery – Michael Lopinot

148. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

149. At all times material hereto, LOPINOT commenced a course of conduct such that he intended to touch, strike, apply force, and/or make contact with LEATH's body and actually touched LEATH.

150. At all times material hereto, the contact was harmful or offensive and occurred without LEATH's consent.

151. At all times material hereto, LOPINOT commenced a course of conduct such that his actions occurred with great force and excessive use of force causing LEATH severe bodily injury.

152. LOPINOT acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

153. LOPINOT's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

154. As a direct and proximate result of the excessive use of force, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

155. As a further direct and proximate result of the excessive use of force, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, MICHAEL LOPINOT, for damages, costs and for such other relief as the court deems just and proper.

Count XVII – Assault – Todd Hill

156. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

157. At all times material hereto, HILL commenced a course of conduct such that he intended to threaten the infliction of injury, harm, touch, apply force, and/or make contact with LEATH's body.

158. At all times material hereto, HILL commenced a course of conduct that demonstrated to LEATH that he possessed the apparent ability to cause harm to LEATH and, as a result, LEATH reasonably feared that he was going to be the victim of imminent bodily harm or offensive contact.

159. HILL acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

160. HILL's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

161. As a direct and proximate result of the threatening of harm, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

162. As a further direct and proximate result of the threatening of harm, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, TODD HILL, for damages, costs and for such other relief as the court deems just and proper.

Count XVIII – Battery – Todd Hill

163. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

164. At all times material hereto, HILL commenced a course of conduct such that he intended to touch, strike, apply force, and/or make contact with LEATH's body and actually touched LEATH.

165. At all times material hereto, the contact was harmful or offensive and occurred without LEATH's consent.

166. At all times material hereto, HILL commenced a course of conduct such that his actions occurred with great force and excessive use of force causing LEATH severe bodily injury.

167. HILL acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

168. HILL's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

169. As a direct and proximate result of the excessive use of force, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

170. As a further direct and proximate result of the excessive use of force, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, TODD HILL, for damages, costs and for such other relief as the court deems just and proper.

Count XIX – Assault – Matthew Emala

171. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

172. At all times material hereto, EMALA commenced a course of conduct such that he intended to threaten the infliction of injury, harm, touch, apply force, and/or make contact with LEATH's body.

173. At all times material hereto, EMALA commenced a course of conduct that demonstrated to LEATH that he possessed the apparent ability to cause harm to LEATH and, as a result, LEATH reasonably feared that he was going to be the victim of imminent bodily harm or offensive contact.

174. EMALA acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

175. EMALA's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

176. As a direct and proximate result of the threatening of harm, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

177. As a further direct and proximate result of the threatening of harm, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, MATTHEW EMALA, for damages, costs and for such other relief as the court deems just and proper.

Count XX – Battery – Matthew Emala

178. Plaintiff realleges each and every allegation contained in paragraphs 1 through 45 above and further alleges:

179. At all times material hereto, EMALA commenced a course of conduct such that he intended to touch, strike, apply force, and/or make contact with LEATH's body and actually touched LEATH.

180. At all times material hereto, the contact was harmful or offensive and occurred without LEATH's consent.

181. At all times material hereto, EMALA commenced a course of conduct such that his actions occurred with great force and excessive use of force causing LEATH severe bodily injury.

182. EMALA acted in bad faith and/or with malicious purpose and/or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

183. EMALA's actions fall outside the protections of Florida Statutes § 768.28 (9)(a).

184. As a direct and proximate result of the excessive use of force, LEATH suffered grievously, has been brought into public scandal, and with great humiliation, mental suffering, and damaged reputation.

185. As a further direct and proximate result of the excessive use of force, LEATH suffered bodily injury and resulting pain and suffering, disability, disfigurement, expense for hospitalization, medical and nursing care and treatment, and aggravation of a preexisting condition, mental anguish, endured suffering and aggravation of his physical and mental condition and suffered a damaged reputation, loss of capacity for the enjoyment of life, humiliation personally, and damage to reputation. The losses are either permanent or continuing, and Plaintiff will suffer the losses in the future.

WHEREFORE, Plaintiff, ERROL LEATH, prays that this honorable Court enter judgment against Defendant, MATTHEW EMALA, for damages, costs and for such other relief as the court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff, ERROL LEATH, demands trial by jury of all issues triable as a matter of right by a jury.

Notice of Designation of Electronic Mail Addresses

NOTICE is hereby given, in conformity with the requirements of Florida Rules of Judicial Administration 2.516, of designation of a primary and secondary e-mail address for the undersigned, ROBERT C. ROGERS, JR., Esquire, as set forth below:

1. Primary email address: robert.rogers@rogerslegalfirm.com
2. Secondary email address: angela.smith@rogerslegalfirm.com
3. Third email address: brett.rogers@rogerslegalfirm.com
4. Fourth email address: kim.greenberg@rogerslegalfirm.com

DATED this 30th day of May 2024.

THE ROGERS LAW GROUP P.A.
Counsel for Plaintiff
400 SE 12th Street, Building B
Fort Lauderdale, FL 33316
Telephone: (954) 999-5807 | Fax: (754)701-3874
Primary email: Robert.rogers@rogerslegalfirm.com
Second email: angela.smith@rogerslegalfirm.com
Tertiary email: Kim.greenberg@rogerslegalfirm.com

/s/ *Robert C. Rogers, Jr.*

BY: _____

ROBERT C. ROGERS, JR., ESQ.
RCR/as Florida Bar No.: 274828

Exhibit A

THE ROGERS LAW GROUP P.A.

400 SE 12th Street, Building B
Fort Lauderdale, FL 33316
Telephone: (954) 999-5807 | Fax: (754) 701-3874

Robert C. Rogers, Jr.*
Brett M. Rogers
Howard Herskowitz**
Nichole S. Pacella **

Tax ID #82-5216032

*BOARD CERTIFIED TRIAL LAWYER
** OF COUNSEL

Reply to: Robert C. Rogers, Jr., Esquire
Brett.rogers@rogerslegalfirm.com
Angela.smith@rogerslegalfirm.com
Kim.Greenberg@rogerslegalfirm.com

September 5, 2023

VIA REGULAR MAIL AND CERTIFIED MAIL #70223330000084524232

City of Fort Lauderdale

Attn: Mayor Dean J. Trantalis
City Hall
100 N Andrews Ave, 8th Floor
Fort Lauderdale, FL 33311

VIA REGULAR MAIL AND CERTIFIED MAIL #70223330000084524256

City of Fort Lauderdale

Attn: Risk Management
City Hall
100 N Andrews Ave
Fort Lauderdale, FL 33311

RE:	CLAIMANT:	ERROL LEATH
	NOTICE OF CLAIM:	ERROL LEATH v. CITY OF FORT LAUDERDALE
	S. S. NO.:	[REDACTED]
	DATE OF BIRTH:	[REDACTED]
	PLACE OF BIRTH:	[REDACTED]
	DATE OF LOSS:	07/19/2023

Dear Sir/Madam:

You are advised that **ERROL LEATH** hereby notifies you that he has a claim for damages against City of Fort Lauderdale, which he hereby asserts pursuant to Florida Statute § 768.28.

His claim arises as a result of injuries he sustained due to an unlawful seizure and excessive force by City of Fort Lauderdale police officers. The incident occurred on July 19, 2023. Said incident occurred near the bus stop at or about State Road 7 and NW 29th Street in Lauderdale Lakes, Broward County.

The aforementioned incident was the direct and proximate result of the City of Fort Lauderdale's negligence, by and through its agents and/or employees. Said negligence caused or contributed to cause the accident, resulting in injuries to Errol Leath.

Errol Leath is making a claim in the amount of the waiver of sovereign immunity of two hundred thousand dollars (\$200,000.00).

There are no prior adjudicated unpaid claims in excess of \$200.00 owed to the State of Florida, its agency, officer, or one of its political subdivisions.

Very truly yours,

/s/ *Brett Rogers*

BRETT M. ROGERS, ESQ.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

City of Ft. Lauderdale
Attn: Mayor Dean J. Trantala
City Hall
100 N. Andrews Ave 8th Fl
Ft. Lauderdale, FL 33311



9590 9402 8060 2349 5155 93

2. Article Number (Transfer from service label)

7022 3330 0000 8452 4232

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

Ashley K Dixon

C. Date of Delivery

9/19/23

D. Is delivery address different from item 1?

☒ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Insured Mail Restricted Delivery
(over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted
Delivery☐ Signature Confirmation™☐ Signature Confirmation
Restricted Delivery

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

City of Ft. Lauderdale
Attn: Risk Management
City Hall
100 N. Andrews Ave 8th FL.
Ft. Lauderdale, FL 33311



9590 9402 8060 2349 5155 86

2. Article Number (Transfer from service label)

7022 3330 0000 8452 4256

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *C. Kearney*

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery☒ Certified Mail®☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery☐ Insured Mail☐ Insured Mail Restricted Delivery
(over \$500)☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted
Delivery☐ Signature Confirmation™☐ Signature Confirmation
Restricted Delivery