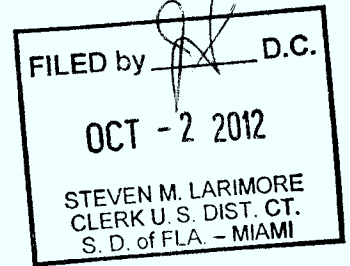


IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE SOUTHERN DISTRICT OF FLORIDA

\*\*\*\*\*

CASE NUMBER: (TO BE SUPPLIED)

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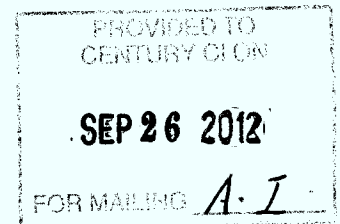
ALBERIC ISRAEL, )  
& SHEILA MESADIEU, )  
PLAINTIFFS, )

PLAINTIFF DEMANDS A JURY TRIAL

V. )

CITY OF NORTH MIAMI, )  
CHIEF OF POLICE, )  
CLINT SHANNON, )  
DETECTIVE, )

JOSEPH KISSEL, )  
ASST. STATE ATTORNEY, )  
HELEN PAGE, )  
(OFFICIALLY AND )  
INDIVIDUALLY, )  
DEFENDANTS. )



cat/div 1983/550/8DE  
Case # \_\_\_\_\_  
Judge \_\_\_\_\_ Mag PAW  
Motn lfp no Fee pd \$ no  
Receipt # \_\_\_\_\_

INITIAL COMPLAINT

This is a civil rights action filed by **ALBERIC ISRAEL**, a state prisoner, and **SHEILA MESADIEU**, Wife of the Plaintiff, an individual, authorized by Title 42, §1983, to redress the deprivation, under color of State law, of his rights secured by the Constitution of the United States.

## **I. JURISDICTION AND VENUE**

1.) Title 42 United States Code, §1983 provides in relevant part:

“Civil action for deprivation of rights --

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.” Id.

2.) This Honorable Court has jurisdiction under the auspices and dictates of 28 U.S.C. §1331, and §1343 (a)(3).

3.) The United States District Court, Southern District of Florida is the appropriate venue for the filing of this complaint under 28 U.S.C. §1391(b)(2), because it is where the substantial violation of the Plaintiff's Constitutional rights occurred.

## **II. PLAINTIFFS**

4.) The Plaintiff, **ALBERIC ISRAEL**, is a State prisoner, under sentence rendered in Miami-Dade County, Florida, for the same incident relevant to the instant complaint, and as such, is in the custody and control of the Florida Department of Corrections. The Plaintiff is currently housed at Century Correctional Institution, 400 Tedder Road, Century, Florida 32535.

5.) The Plaintiff, **SHEILA MESADIEU**, is the Wife of the Plaintiff, and with regard to the instant action, an individual, residing at 13625 Northeast 6th Avenue, Apt. 208, North Miami, Florida 33161.

## **III. DEFENDANTS**

6.) The Defendant, **CITY OF NORTH MIAMI**, is a municipality, and is sited at 776 N.E. 125<sup>th</sup> Street, North Miami, FL 33161, and at all times relevant to the instant complaint was a Defendant in this cause.

7.) The Defendant, **CLINT SHANNON**, is the Chief of North Miami Police Department, and his address is 700 N.E. 124<sup>th</sup> Street, North Miami, FL 33161, and at all times relevant to the instant complaint was a Defendant in this cause.

8.) The Defendant, **JOSEPH KISSEL**, is a detective with the North Miami Police Department, is to be found at 700 N.E. 124<sup>th</sup> Street, North Miami, FL 33161, and at all times relevant to the instant complaint was a Defendant in this cause.

9.) The Defendant, **HELEN PAGE**, is the Assistant State Attorney, Miami, Florida, and is located at 1350 N.W. 12<sup>th</sup> Avenue, Miami, FL 33136-2111, and at all times relevant to the instant complaint was a Defendant in this cause.

#### **IV. STATEMENT OF FACTS**

On November 16, 2005 Plaintiff was involved in a shooting in which the victim, Sheila Mesadieu (Plaintiff's wife), suffered injuries requiring medical treatment.

Plaintiff placed the victim/wife in Plaintiff's 1995 Lexus LS400, VIN #: JT8UF11E6L0046578, license plate # P405XT, and drove the victim to Parkway Regional Hospital, 160 N.W. 170<sup>th</sup> Street, North Miami Beach, FL 33169.

While Plaintiff was at the hospital awaiting official word on his wife's condition, the police arrived and arrested Plaintiff for the shooting.

Ultimately, Kissel took charge of both Plaintiff and the investigation into the shooting. Plaintiff was subsequently transported to the police station and, although the Lexus referenced above played no role in the shooting, bore no relevance to the case, and could yield nothing of evidentiary value as its only connection to the case was the family's ownership, Kissel had the car towed and impounded.

Once Plaintiff had been driven to the police station and interrogated by Kissel, Plaintiff was subsequently transported to the Dade County Jail. However, for esoteric reasons, Kissel informed Plaintiff that Plaintiff's Movado watch, which

also played no role in the shooting, had no relevance to the case, and could yield nothing of evidentiary value, could not be transported to the jail in Plaintiff's possession. Kissel then removed the watch from Plaintiff's wrist, and did not permit it to transport to the jail with Plaintiff.

Plaintiff was simply told that he could not be transported wearing the watch, nor would Plaintiff's cell phone be permitted to transport with Plaintiff to the jail.

On November 28, 2005 Plaintiff's wife, Ms. Sheila Mesadieu, requested from Kissell the return of the car and all other property confiscated from Plaintiff incident to the November 16, 2005 arrest, including Plaintiff's watch, cell phone, and an unrelated .357 caliber handgun and holster which was registered to Plaintiff and stored in the trunk of the car (Lexus).

Kissel advised Ms. Mesadieu that because she was the victim in the case for which Plaintiff had been arrested, she would not be allowed to retrieve the property unless she first obtained a power of attorney, even though by law the property in fact also belonged to Ms. Mesadieu as Plaintiff's common-law wife.

On December 9, 2005 Ms. Mesadieu again, with power of attorney in hand, requested Plaintiff's property from Kissel, but was advised by Kissel at that time that the property was no longer available and the car had been sold.

Finally, on October 4, 2006 Plaintiff by and through trial counsel filed a motion for the return of property.

not be sold or appropriated or destroyed prior to the conclusion of the proceedings – whenever that may occur.

Further, even after the conclusion of the proceedings, a 60-day window of opportunity exists for the retrieval of the property if released.

The record in our case appears to suggest that as early as December 9, 2005 – less than 30 days after it was seized – Kissel was alleging to Ms. Mesadieu that the car had been sold, and no other property belonging to Plaintiff existed.

However, there is no ambiguity as to the fact that on the date the trial court released the personal property – October 4, 2006 – well before the conclusion of the proceeding, the car and property were said by Kissel to no longer exist. The city therefore, negligently supervised, corrected, monitored, and otherwise failed in its duty to insure that its police abstained from the practice of confiscating the personal property of private citizens where there has been no showing of a legitimate judicial interest in the confiscation or any evidentiary value in the property.

**CHIEF OF POLICE:**

Chief Clint Shannon, as the chief of the city's police department, had a duty to the city and the private citizens within his jurisdiction to insure that those citizens were not subjected to unreasonable seizures of their personal and private property.

Moreover, as Kissel's direct supervisor, Shannon knew or should have known that Kissel had not articulated a reasonable or even logical basis for seizure, confiscation, or forfeiture of the property.

In fact, Shannon knew or should have known that, under the facts and circumstances of this case, that Kissel had presented basis for nothing more intrusive than a cursory inspection of the vehicle in the hospital's parking lot, where nothing in evidence or in Kissel's direct knowledge of the case even remotely suggested that the car, watch, or cell phone had been used to commit a crime.

Additionally, Shannon knew or should have been trained to know that property seized as evidence could be neither sold, nor appropriated, destroyed, or otherwise made unavailable prior to the disposition of the criminal proceedings, or a release by the trial court.

However, as early as December 9, 2005 – less than 30 days after its seizure – Kissel was alleging to Ms. Mesadieu that the property had been sold, and/or otherwise made unavailable.

Chief Shannon acquired the position of chief through superior skill, qualification, and experience as a police official whose experience should have instinctively shown him that Kissel was not dealing with a criminal element, and

was unlikely to discover anything of evidentiary value by confiscating and impounding the property of heretofore, law abiding citizenry.

Contrary to what his experience most surely would have at some point dictated to him however, Chief Shannon stood idly by while Kissel engaged in a senseless and unnecessary fishing expedition resulting in the costly deprivation of the family's only source of transportation.

Therefore, Chief Shannon's liability extends well beyond mere vicariousness, as Kissel's actions had to have the direct approval of Chief Shannon, who affirmatively or tacitly gave such approval by virtue of Chief Shannon's failure to correct, monitor, supervise, train, retrain, or in anywise to discipline Kissel in regards to any actions taken in direct regards to this case.

**HELEN PAGE (PROSECUTOR):**

Helen Page (Page), who prosecuted the criminal cause which resulted in the instant action, had direct supervision of the investigation into the shooting, and moreover had direct supervision over Kissel who acted as Page's investigator. Further, Page had discretion over any and all evidence collected by Kissel in determining its value and necessity as evidence in Page's criminal prosecution.

In addition to this discretion however, Page had an obligation and responsibility to insure that private and personal property lacking in evidentiary



pending sale of the car, when on March 3, 2006 Page sought and was granted an order of the court required Ms. Mesadieu to be in daily contact with Page.

Page's actions and/or inactions were deliberate as opposed to mere inadvertence, and was motivated by, and in the furtherance of her malicious prosecution of the criminal cause in total and absolute disregard for the rights and property of Plaintiff and Plaintiff's family. Page knew or should have known that her actions and/or inactions were in derogation of both Plaintiff's 4<sup>th</sup> and 14<sup>th</sup> Amendment rights prohibiting seizure absent probable cause, and disposition absent due process.

**DETECTIVE KISSEL:**

From the outset, Detective Kissel was fully aware of, and has sufficient information before him to know, that neither Plaintiff's watch, car, nor cell phone had any significant or discernable evidentiary value in the criminal cause.

However, despite being given a consent to search the vehicle on location at the hospital, Kissel nevertheless, and for no readily apparent reason or legitimate police interest, seized the property in question.

Furthermore, although Helen Page sought diligently to exclude any mention of the fact that Kissel had no articulable or reasonable basis for the confiscation of the car and other property, the record nevertheless contains sufficient evidence to

support the fact that no actual basis existed for the initial confiscations nor the subsequent failure to return and disposal of the property.

Moreover, assuming *arguendo*, that Detective Kissel could have somehow believed that the car would contain, or actually was evidence in a shooting which occurred, by all reports, inside of the residence, thereby justifying the seizure, it is unlikely, and illogical to believe, and no evidence supports a conclusion that Kissel also expected Plaintiff's watch and cell phone to yield valuable evidence in the shooting.

Furthermore, because no policy within the North Miami Police procedures prohibits the transfer of prisoners from the police station to the jail with their watches, Kissel acted outside the scope of his employment when he confiscated Plaintiff's watch. And, although a legitimate police interest may be *presumed* in regards to the confiscation of Plaintiff's cell phone and handgun, permanent deprivation is incomprehensible under any logical or reasonable stretch of the imagination, even assuming the items were of some evidentiary value.

Moreover, it is readily apparent that Kissel's actions were derived from some personal and misguided motivation where, as stated supra, Kissel had no action and articulable basis for the seizure from the outset, but even after, as she alleged, Helen Page released the property sometime prior to the October 4, 2006 court order, Kissel went out of his way to block the return of the property.

On November 28, 2005 when Ms. Mesadieu originally requested the return of her car, she was told by Kissel that because she was the victim of the shooting, she would need a power of attorney from Plaintiff.

However, on December 9, 2005 when Ms. Mesadieu returned – power of attorney in hand – Kissel, incredibly, advised Ms. Mesadieu that the car had been sold.

First of all, Kissel knew of should have known that, pursuant to Florida law, a wife needs nothing more than a signed release from her husband to retrieve his property from the police if the property has been cleared. Secondly, Kissel knew that the car could not possibly have been sold less than a month from when it was confiscated, and only a matter of a week since Kissel had required Ms. Mesadieu to obtain a power of attorney.<sup>1</sup>

Because the articles of property in question here were not confiscated for evidentiary purposes, it is reasonable to conclude that they were confiscated for the sole purpose of deriving some personal or corporate gain, and in wanton disregard for the rights of others.

The property was therefore misappropriated and/or stolen by Kissel under the guise of the color of law, with the deliberate intent to permanently deprive Plaintiff and his family of the use and benefit of the property in total disregard of

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<sup>1</sup> When Ms. Mesadieu initially requested the car, it was clearly visible and parked in the police station's parking lot. However, on December 9, 2005 the car was no longer visible.

both the U.S. and Florida Constitution's prohibition against deprivation without probable cause.

## **VI. CLAIMS FOR DAMAGES**

Plaintiff claims compensatory and punitive damages in the following amounts:

- 1) **City of Miami:** Movado Watch - \$5,000.00; cell phone - \$175.00; 1995 Lexus LS400 - \$20,000.00; .357 Magnum - \$500.00.
- 2) Deprivation of transportation reimbursement and luxury of ownership from November 2005 to present - \$42,000.00 (derived from a \$150.00 weekly rate).
- 3) Punitive damages for mental and emotional stress, humiliation and embarrassment, and lost wages of family - \$100,000.00.
- 4) Cost and attorney fees – to be determined.

### **Defendants:**

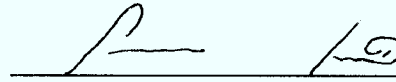
- 1) **Chief Shannon:** Compensatory damages - \$25,675.00; punitive damages - \$74,325.00.
- 2) **Detective Kissel:** Compensatory damages - \$25,675.00; punitive damages - \$74,325.00.
- 3) **Helen Page:** Compensatory damages - \$25,675.00; punitive damages - \$74,325.00.

## **VII. CONCLUSION**

Further, if a settlement cannot be reached in this matter, take note that Plaintiff will seek to have the matter resolved in a jury trial.

This matter will, if not resolved within 180 days from date of receipt, result in the filing of a formal complaint in the United States District Court, Southern District of Florida.

Respectfully submitted,



**Alberic Israel, Plaintiff**

### **VIII. CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing **PLAINTIFF'S NOTICE OF INTENT TO SUE** has been furnished by Certified Mail to the City of North Miami, Clarence Patterson, City Manager, 776 N.E. 125<sup>th</sup> Street, North Miami, FL 33161; Dept. of Financial Services, 200 East Gaines Street, Tallahassee, FL 32399; and by Regular U.S. Mail to Dept. of Financial Services, 401 N.W. 2<sup>nd</sup> Ave., Ste. N121, Miami, FL 33128; Detective Joseph Kissel, North Miami Police Dept., 700 N.E. 124<sup>th</sup> Street, North Miami, FL 33161; Clint Shannon, Chief of North Miami Police Dept., 700 N.E. 124<sup>th</sup> Street, North Miami, FL 33161; and Helen Page, Assistant State Attorney, 1350 N.W. 12<sup>th</sup> Avenue, Miami, FL 33136-2111, by placing in the hands of an institution official for mailing this 26<sup>th</sup> day of September 2012, by the undersigned.



**Alberic Israel, Plaintiff, DC # M58911**  
Century Correctional Institution  
400 Tedder Road  
Century, FL 32535

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT,  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

**ALBERIC ISRAEL,  
& SHEILA MESADIEU,  
PLAINTIFFS,**

**V.**

**CITY OF NORTH MIAMI,  
CHIEF OF POLICE – CLINT SHANNON,  
DETECTIVE – JOSEPH KISSEL,  
ASST. STATE ATTORNEY – HELEN PAGE,  
(OFFICIALLY AND INDIVIDUALLY),  
DEFENDANTS.**

**CASE NUMBER:  
10007915CA01  
C.C. CASE NUMBER:  
F05-35807**

9/7/2012  
A.I. FOR MAILING  
Copy

**MOTION FOR VOLUNTARY DISMISSAL, AND NOTICE OF  
TRANSFER OF CASE TO THE FEDERAL SYSTEM.**

**COMES NOW**, the Plaintiff's, Alberic Israel, and Sheila Mesadieu, Pro Se, pursuant to Florida Rules of Civil Procedure, Rule 1.420(a), and moves this Honorable Court for the entry of an order dismissing the lawsuit in the above-styled cause, and hereby notifies this Honorable Court that the suit will be transferred to the United States District Court, In and For the Southern District of Florida. In support of this document, the Plaintiff's would state the following:

1.) On July 6, 2009, the Plaintiff's filed a Notice of Intent to Sue in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit A).

2.) On September 2, 2009, the Plaintiff's filed a Notice of Joinder of Cause in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit B).

3.) On December 10, 2009, the Plaintiff's filed a Tort Claim for Money Damages, demanding a Jury Trial on all issues triable, in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit C).

4.) On February 5, 2010, the Clerk of the Circuit Court, in and for Miami-Dade County, adjudged the Plaintiff's to be Indigent, providing the Plaintiff's with a Certificate of Indigency, in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit D).

5.) On July 6, 2010, the Plaintiff's filed a Notice of Witnesses to all Parties, in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit E).

6.) On August 2, 2010, the Plaintiff's filed a Notice of Inquiry to the Eleventh Judicial Circuit, In and For Miami-Dade County, in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit F).

7.) On September 5, 2010, the Plaintiff's filed a Notice of Inquiry, inquiring about the previously filed Notice of Inquiry filed on August 2, 2010, in Case

Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit G).

8.) On December 2, 2010, the Plaintiff's filed a Notice of Action in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit H).

9.) On December 22, 2010, the Plaintiff's filed a Petition for Writ of Mandamus in the Third District Court of Appeal, for the lack of response and total disregard shown to the filing of his Civil Suit in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit I).

10.) On January 4, 2011, the Plaintiff received an Acknowledgement of New Case from the Third District Court of Appeal containing the new case number of 3D11-10 explaining that the filing fee was due, and in regard to Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit J).

11.) On January 5, 2011, the Third District Court of Appeal issued an order requiring the filing fee prior to January 25, 2011, or an order from the lower tribunal declaring that the Plaintiff's were insolvent in DCA Case Number 3D11-10, and in regard to Case Number 10007915CA01, related to Criminal Case Number F05-35807. (See, Exhibit K).



12.) On January 14, 2011, the Plaintiff timely replied to the order of the Third District Court of Appeal, filing his Response to the Court's order. (See, Exhibit L).

13.) On February 2, 2011, the Third District Court of Appeal granted the Plaintiff permission to proceed in forma pauperis in DCA Case Number 3D11-10, and in regard to Case Number 10007915CA01, related to Criminal Case Number F05-35807. (See, Exhibit M).

14.) On June 16, 2011, the Plaintiff's filed a Motion for Constructive Hearing in regard to Case Number 10007915CA01, related to Criminal Case Number F05-35807. (See, Exhibit N).

15.) On July 11, 2011, the Plaintiff received a correspondence from Claudia Castro, Judicial Assistant to The Honorable Teretha Lundy Thomas, Administrative Judge, acknowledging receipt of the suit and the transfer of the suit to the Honorable Victoria Sigler of the Eleventh Judicial Circuit, and on July 15, 2011, the Plaintiff's filed a Request for Civil Docket Information in regard to Case Number 10007915CA01, related to Criminal Case Number F05-35807. (See, Exhibit O).

16.) On September 1, 2011, the Plaintiff's filed a letter to the Inspector General seeking assistance in the gathering of information related to the myriad of

motions and documents filed in the above-styled cause for which all were distinctly ignored. The Plaintiff received no reply. (See, Exhibit P).

17.) On September 1, 2011, the Plaintiff's subsequently filed a Notice of Inquiry in regard to Case Number 10007915CA01, related to Criminal Case Number F05-35807. (See, Exhibit Q).

18.) On November 4, 2011, the Plaintiff's filed another Notice of Action in regard to Case Number 10007915CA01, related to Criminal Case Number F05-35807, as the first was completely ignored. (See, Exhibit R).

19.) On December 2, 2011, the Plaintiff's filed another Petition for Writ of Mandamus in the Third District Court of Appeal again for the lack of response and total disregard shown to the filing of his Civil Suit in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit S).

20.) The Third District Court of Appeal issued another Case Number as an Acknowledgement of New Case (3D11-3173), and on December 9, 2011, sent the Plaintiff another Notice that the filing fees was due, and on December 28, 2011, the Plaintiff filed another Reply to the Order of the Third District Court of Appeal in regard to the Civil Suit in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit T).

21.) On May 29, 2012, the Plaintiff's filed a Notice of Inquiry/Motion to Clarify, with regard to the lack of response and total disregard shown to the filing of his Civil Suit in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit U).

22.) On June 11, 2012, the Plaintiff's filed an Inquiry/Request for Docket Sheet, with regard to the lack of response and total disregard shown to the filing of his Civil Suit in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit V).

23.) On or about, June 18, 2012, the Plaintiff's received a Docket Sheet for Third District Court of Appeal Case Number 3D11-3173. (See, Exhibit W).

24.) On July 16, 2012, the Plaintiff's filed a Notice of Filing, furnishing the Clerk of the Court with Summons' for all of the Defendant's named in the suit, and sent a correspondence to the Department of Financial Services outlining the fact that he had received no responses to any of his filings of his Civil Suit in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit X).

25.) On July 23, 2012, the Plaintiff's received an Order from the Third District Court of Appeal stating that the Petitions for Writ of Mandamus were dismissed due to a failure to follow the auspices and dictates of the Florida Rules of Civil Procedure. (See, Exhibit Y).

26.) On August 9, 2012, the Plaintiff's filed Motions for Default against all named Defendant's with regard to the lack of response and total disregard shown to the filing of his Civil Suit in Case Number 10007915CA01, and related to Criminal Case Number F05-35807. (See, Exhibit Z).

27.) To date, the Plaintiff's have had no response to the pending litigation, and as such, the Plaintiff's now feel that the suit is best served in the Federal Court's where their action will be determined and be correctly adjudicated on the merits. Thus, the Plaintiff now states for the record that the instant **MOTION FOR VOLUNTARY DISMISSAL, AND NOTICE OF TRANSFER OF CASE TO THE FEDERAL SYSTEM** is filed in good faith, and as a continuum of the litigation filed in the Circuit Court of the Eleventh Judicial Circuit, the Plaintiff's fully intend to file the attached document as soon as feasibly possible.

It is so prayed.....

Respectfully Submitted,



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Mr. Alberic Israel, #M58911,  
Century Correctional Institution  
400 Tedder Road  
Century, Florida 32535

**OATH/DECLARATION**

**I DECLARE UNDER THE PENALTY OF PERJURY** that I, Mr. Alberic Israel, have read the foregoing **MOTION FOR VOLUNTARY DISMISSAL, AND NOTICE OF TRANSFER OF CASE TO THE FEDERAL SYSTEM,** that I am the Plaintiff in the above-styled cause, and that I have personal knowledge of the facts and matters therein set-forth and alleged and that each and all of these facts and matters therein set-forth and alleged are true.

**ACCORD:** Ch. 92.525, Fla. Stat.

*Executed* this 7<sup>th</sup> day of September, 2012, by the undersigned.

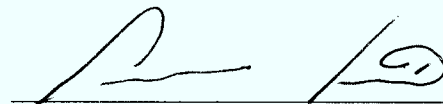
  
\_\_\_\_\_  
Mr. Alberic Israel, #M58911,  
Century Correctional Institution  
400 Tedder Road  
Century, Florida 32535

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY**, that on the date indicated below, I placed this document in the hands of prison officials for mailing to:

- City of North Miami: Clarence Patterson, City Manager, 776 N.E. 125th Street, North Miami, Florida 33161;
- Detective Joseph Kissel, North Miami Police Department, 700 N.E. 124th Street, North Miami, Florida 33161;
- Clint Shannon, Chief of North Miami Police Department, 700 N.E. 124th Street, North Miami, Florida 33161;
- Helen Page, Assistant State Attorney, 1350 N. W. 12th Avenue, Miami, Florida 33136-2111;
- Harvey Ruvin, Clerk of Miami-Dade County, Civil Division, 73 West Flagler Street, Miami, Florida, 33130; and,
- Office of the Attorney General, Pamela Jo Bondi, River Gate Plaza, 444 Brickell Avenue, Suite 950, Miami, Florida 33131.

Date: 9 - 7 - 2012

  
\_\_\_\_\_  
Mr. Alberic Israel, #M58911,  
Century Correctional Institution  
400 Tedder Road  
Century, Florida 32535

ALBERIC ISRAEL, M58911  
CENTURY CORRECTIONAL INSTITUTION  
400 JEDDER ROAD, CENTURY,  
FLORIDA 32535-3700