

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

**SONJA HAUGHT, an individual, JANIS  
LENTZ, an individual, and MAURICIO  
ROSAS, an individual,**

**Plaintiffs**

v.

**THE CITY OF TAMPA, FLORIDA, a  
Florida municipal corporation, and  
BENNIE HOLDER, as Chief of Police for  
the Tampa Police Department,**

**Defendants**

Case No.:

**Complaint for Declaratory and Injunctive Relief, Damages,  
Attorney's Fees, and a Demand for Jury Trial**

Plaintiffs, SONJA HAUGHT, JANIS LENTZ, and MAURICO ROSAS, as individuals, sue Defendants, THE CITY OF TAMPA, FLORIDA, a Florida municipal corporation, and BENNIE HOLDER, as Chief of Police for the Tampa Police Department, and for their Complaint allege as follows:

**I. PRELIMINARY STATEMENT**

This is an action under the laws and Constitution of the United States alleging that THE CITY OF TAMPA, FLORIDA, by and through the actions of the Tampa Police Department, acting in concert, seek to impose an impermissible and unconstitutional prior restraint on the presentation and expression of political speech, clearly protected by the First Amendment to United States Constitution and Article I, Section 4, of the Florida Constitution, as well as other

constitutional grounds, by creating and engaging in a pattern of harassment through the custom and practice of the use of excessive force and/or excessive interference through the unlawful arrests and intimidation of Plaintiffs in the exercise of presenting opposing political views at political events traditionally taking place in a public forum. As a result of the wrongful conduct of the Defendants, which was effected with full knowledge of and callous indifference to the constitutional rights of the Plaintiffs, said Plaintiffs have suffered irreparable harm of the loss of their constitutional rights to free expression, pain and suffering, and other damages all effected through the acts of Defendants under color of State law.

## **II. JURISDICTION**

1. This is an action for declaratory and injunctive relief, damages, and attorney's fees.
2. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331 and 1343 in that these matters arise out of the First, Fourth, Fifth, and Fourteenth Amendments to the United States Constitution and 42 U.S.C. §§ 1983, 1985, and 1988.
3. The supplemental jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1367. The supplemental matters arise out of Article I, §§ 2, 4, 5, 9, 10, 12, 21, and 23, and Article X, § 6 of the Constitution of the State of Florida.
4. Venue in this Court is appropriate under 28 U.S.C. Section 1391(b) as the ordinance about which the Plaintiff complains and from which Plaintiff seeks relief has been enacted and will be enforced within this judicial district.

## **III. THE PARTIES**

5. **SONJA HAUGHT**, (hereinafter "HAUGHT") is an individual, and a resident within the jurisdiction of the United States District Court for the Middle District of Florida.
6. **JANIS LENTZ**, (hereinafter "LENTZ") is an individual, and a resident within the

jurisdiction of the United States District Court for the Middle District of Florida.

7. **MAURICIO ROSAS**, (hereinafter “ROSAS”) is an individual, and a resident within the jurisdiction of the United States District Court for the Middle District of Florida.

8. At all times material hereto, Defendant **THE CITY OF TAMPA, FLORIDA**, (hereinafter “CITY”) was and is a Florida municipal corporation.

9. Defendant **BENNIE HOLDER**, (hereinafter “HOLDER”) as Police Chief of the Tampa Police Department was at all times material hereto, and is, the duly appointed Chief of Police for the City of Tampa, Florida, and is being sued in his official capacity. By naming HOLDER in his official capacity this Complaint contemplates and incorporates the activities of all Officers of the Tampa Police Department acting under the authority of same, including, but not limited to the following:

- a. Sophia L. Teague is a District Commander of the Tampa Police Department of the City of Tampa at all times relevant to this Complaint.
- b. Gregory L. Stout was a Detective of the Tampa Police Department, Criminal Investigation Bureau and has acted as the District Commander and City of Tampa Police Officers at all times relevant to this Complaint.
- c. Robert A. Lovering was an officer of the Tampa Police Department, of the City of Tampa at all times relevant to this Complaint.
- d. Al Rahmings was an officer of the Tampa Police Department, of the City of Tampa at all times relevant to this Complaint.
- e. Ruth Stephenson was an officer of the Tampa Police Department, of the City of Tampa at all times relevant to this Complaint.
- f. Jon E. Solomon was an officer of the Tampa Police Department, of the City of Tampa

at all times relevant to this Complaint.

- g. Jill Ramsten was an officer of the Tampa Police Department, of the City of Tampa at all times relevant to this Complaint.

#### **IV. GENERAL ALLEGATIONS**

10. On or about June 4, 2001, at approximately 16:00 Plaintiffs assembled at Legend's Field, located in City of Tampa, Florida, for a political event open to any member of the public who held or presented free tickets obtainable by anyone who requested them for attendance of the event.
11. President George W. Bush and Governor Jeb Bush were to speak to assembled ticket holding crowd about matters of public importance.
12. The Plaintiffs had tickets to the event and were admitted to the event upon presentment of same.
13. Plaintiffs arrived at the security checkpoint, with tickets in-hand, as uniformed event staff and security personnel checked all handbags, backpacks, purses and other belongings of those members of the public in attendance.
14. At the checkpoint, security personnel requested the removal of a stick of approximately five inches in length which was attached to one of the signs, which was done by Plaintiffs, who were then allowed to proceed into the stadium upon compliance.
15. Plaintiffs assembled on the infield with the other members of the crowd in attendance and exercised their First Amendment rights by holding up their small 8.5" x 11" paper signs, that stated the Plaintiffs' political beliefs. One sign called for the investigation of the 2000

Presidential election, and another sign announced that “June is Gay Pride Month.” Other event participants held signs that read “Cuban-Americans for Bush,” “Americans Support Bush’s Tax Cuts,” and other messages expressing approval of the President.

16. Event attendees, realizing that the Plaintiffs’ were expressing view points contrary to the messages of approval expressed by the vast majority of the crowd, started to “boo” and otherwise expressed disapproval of Plaintiffs messages.
17. At approximately 16:45 William Bunkley, a Republican event staffer, having been made aware of the disapproval of Plaintiffs viewpoints, and communicating over a portable two-way radio with other unknown parties, arrived on the scene in the vicinity of the Plaintiffs.
18. In holding the signs containing their political viewpoints aloft, the Plaintiffs were passive, were not disruptive, made no attempt to and did not impinge upon the rights of others, and were not interfering with or disrupting the event.
19. William Bunkley, shortly after arriving on the scene, stated to the crowd, “I’ve called the police!”
20. At this point during the event, members of the Tampa Police Department and event security personnel engaged in conduct calculated and intended to deny Plaintiffs of their Constitutional Rights.
21. This conduct included warnings from Tampa Police Officers that unless the Plaintiffs discontinued the exhibition of their signs that they would be arrested and removed from the premises.

22. The Plaintiffs declined and continued to exhibit their signs in a peaceful and nondisruptive fashion.
23. Officer Robert A. Lovering came onto the scene and restrained Plaintiff ROSAS, and stated to ROSAS “lose the sign and you can stay!”
24. Plaintiff ROSAS remained completely calm and quiet, at which time Officer Lovering then contacted Officer Teague asking for assistance.
25. Plaintiff HAUGHT expressed her concern to Officer Lovering that ROSAS was in ill health.
26. Plaintiffs remained calm and grouped together out of concern for their own safety and fear that ROSAS would collapse because of a history of seizures and the extreme heat of the day.
27. Plaintiff HAUGHT questioned Officer Lovering, “Why do we have to lose our signs? Why can’t they [other attendees] lose their signs?”
28. Officer Lovering heatedly replied to Plaintiff HAUGHT, “Lose the sign and you can stay! Don’t push the issue!”
29. Referring to the signs supportive of the President Bush and/or Governor Bush, Plaintiff HAUGHT asked again, “Why can’t they lose their signs? To which Officer Lovering answered, “Your talking to the wrong person.”
30. Bunkley gathered other event organizers to surround the Plaintiffs with large poster size signs, many of which were supportive of President Bush and/or Governor Bush. The signs were displayed without objection by event staff. The signs were then used to prevent videographers from having a clear view of the Plaintiffs, and the Officers and the event

staffers.

31. Officers Lovering, Stephenson and Rahmings then proceeded to, through excessive use of force, remove the Defendants from the field.
32. Officer Rahmings advanced towards the Plaintiffs from the front while Officer Stephenson handcuffed Plaintiff LENTZ with hands behind her.
33. Plaintiffs ROSAS and HAUGHT fell to the ground because of the pushing and shoving and to secure their possessions.
34. Officers Lovering and Rahmings with the aide of William Cordova, William Bunkley and Randy Baker, the Legends Field Security Chief, forcibly removed Plaintiffs ROSAS and HAUGHT depriving them of their liberty.
35. Officers Lovering and Rahmings handcuffed Plaintiff ROSAS with his hands behind his back in a crucifix hold and dragged him across the field and down a flight of stairs.
36. Plaintiff ROSAS begged Officers Lovering and Rahmings to lift his legs because he could not walk (ROSAS has a congenital neuromuscular syndrome known as hereditary motor and sensory neuropathy or Charcot-Marie-Tooth).
37. Plaintiff HAUGHT was forcibly lifted onto her feet by Randy Baker and then was restrained by holding her hands behind her back, depriving her of her liberty.
38. Plaintiff LENTZ was handcuffed with hands behind her back by Officer Stephenson.
39. Officer Stephenson used Plaintiff LENTZ as a shield to force her way through the crowd, through excessive use of force. In so doing, Officer Stephenson shoved Plaintiff LENTZ

down pushing her onto an 81 year-old citizen, Walter Sorensen, knocking both to the ground and rendering Sorensen unconscious.

40. Sorensen suffered lacerations to the back of his head from the impact and further suffered injuries to his coccyx, requiring medical treatment.

41. Plaintiff HAUGHT, who was restrained by Randy Baker, an event security officer shouted, “Don’t do that!” To which Officer Stephenson responded, “Assault on a Police Officer!”

42. Defendant LENTZ’ eyeglasses were crushed in the impact against Sorensen’s head.

43. Officer Stephenson through excessive use of force, pulled HAUGHT by the sleeve of her right shoulder that was recently operated for a torn rotator cuff, and pulled Plaintiff LENTZ with her right hand taking both into the first base dugout, through excessive use of force.

44. Officers Lovering, Stephenson, and/or Rahmings bodily removed Plaintiffs from the field, and dragged Plaintiffs from said stadium through excessive use of force, and detained them.

45. Plaintiffs HAUGHT and LENTZ were placed on the concrete floor approximately for twenty minutes.

46. Plaintiff ROSAS lay on the concrete floor for the same length of time.

47. During the detention after their arrest, the Officers called their supervisors repeatedly both via official police communications devices and cell phones to determine what to do with the Plaintiffs. Radio transmissions were audiotaped by the Tampa Police Department, cellular telephone calls were not.

48. Once the Officers made a determination on how to proceed, the Officers approached each



Plaintiff with their respective criminal reports affidavits, asked each to read it, sign it, and told them to appear in court.

49. Plaintiff's handcuffs were removed and the Officers escorted them to their cars, forcing them to leave the event and preventing any further expression of their political viewpoints.

50. The City of Tampa, through the adoption of municipal legislation, has created a "First Amendment Zone" which is a remote and undesirable area distant to facilities utilized as public forums which is designed to purportedly satisfy the requirement that citizens be allowed to express their First Amendment rights at said public forums.

51. Plaintiffs then asked if they could go to the purported "First Amendment Zone" outside of the Stadium and were told that they were "through protesting for the day."

52. As a direct and proximate result of the conduct, customs, and policies of Officers of the Tampa Police Department, Plaintiffs suffered physical injury, and/or loss of income, and/or medical expenses, and/or severe mental anguish in connection with the deprivation of their constitutional and statutory rights guaranteed by the First and Fourteenth Amendments of the Constitution of the United States and protected by 42 U.S.C. § 1983.

53. As a result of the excessive use of force by the Officers, Plaintiff ROSAS suffered lacerations to his shins, bruises to his shoulders and wrists, dehydration, and loss of confidence in the ability of the Police to protect him from harm, and continuing pain, suffering, and mental anguish as a direct and proximate result of the actions of Defendants.

54. As a result of the excessive use of force by the Officers, Plaintiff LENTZ received bruises throughout her body, a laceration to the bridge of her nose, and continuing pain, suffering,

and mental anguish as a direct and proximate result of the actions of Defendants.

55. As a result of the excessive use of force by the Officers, Plaintiff HAUGHT received bruises throughout her body, continuing pain, suffering, and mental anguish as a direct and proximate result of the actions of Defendants, as well as suffered financial losses and/or economic loss due to interruption in her private practice as a licensed clinical social worker.

56. Officer Stephenson completed a sworn statement claiming that Plaintiff HAUGHT had committed disorderly conduct and was trespassing after warning. Said complaint alleged the dated offenses occurred at Legends Field on June 4, 2001, at One Steinbrenner Drive, City of Tampa. Said charges were Dismissed by State Prosecutors on July 26, 2001, before the Thirteenth Judicial Circuit Court of the State of Florida.

57. Defendants also completed sworn statements claiming that Plaintiffs HAUGHT and LENTZ had committed trespassing. Those charges were also dismissed for want of any factual basis to support the charges.

58. The acts of all Defendants were committed under the color of state law and were an example of the custom, practices, and policies of the Tampa Police Department to deprive the Plaintiffs of their constitutionally protected rights, of which all members of the Tampa Police Department were aware, but were denied with impunity and callous indifference.

**V. GENERAL ALLEGATIONS SUPPORTING  
DECLARATORY AND INJUNCTIVE RELIEF**

59. Plaintiffs have a clear legal right to express their political viewpoints without interference by the Defendants, their agents, servants or employees. Any such interference may only take place after Plaintiffs have been afforded due process of law, as guaranteed by the Fourteenth

Amendment to the United States Constitution and Article I, § 9, of the Constitution of the State of Florida; Plaintiffs have been denied due process of law by the unconstitutional application of the customs and practices of Defendants at issue herein on a First Amendment protected form of expression.

60. Plaintiffs' positions, as set forth in this Complaint, are legally sound and supported by fact and law. The Defendants' actions, however, have created a bonafide controversy between the parties, and Plaintiffs are in doubt as to their rights, privileges and immunities with respect to the conduct at issue herein. Plaintiffs require, therefore, a declaratory judgment declaring their rights, privileges and immunities. There is a clear, present, actual, substantial and bonafide justiciable controversy between the parties.

61. Plaintiffs, as a direct and proximate result of the conduct of the Defendants, have been and will be required to terminate or to substantially alter the form of First Amendment protected expression, thus limiting the Plaintiffs' freedom of expression and causing the Plaintiffs severe hardship if the relief requested herein is not granted.

62. Plaintiffs have no adequate remedy at law. No amount of money damages could adequately compensate the Plaintiffs for the irreparable harm described herein. The Plaintiffs in this case wish to exercise a constitutional right which is guaranteed them under the First Amendment to the United States Constitution. Neither damages, replevin, attachment nor any other legal remedy will suffice to safeguard the exercise of that right. In order to constitute an "adequate" legal remedy, the remedy at law must be plain, certain, prompt, speedy, sufficient, complete, practical, and efficient in attaining the ends of justice. It is unquestionable that no legal remedy would ever suffice to properly address state action that ultimately results in denying citizens rights guaranteed by the First Amendment.

63. Plaintiffs and the public at large will suffer irreparable injury if injunctive relief is not granted, and Defendants are further permitted to enforce the customs, policies, and practices at issue herein. The loss of rights guaranteed by the First Amendment is so serious that, as a matter of law, irreparable injury is presumed and, in such an instance involving the loss of First Amendment rights, damages are both inadequate and unascertainable.

64. The public interest would best be served by the granting of injunctive relief, and indeed, the public interest is disserved by permitting the enforcement of customs, policies, and practices that are designed to and do exhibit a callous indifference to Plaintiffs constitutional rights, which interferes with the public's rights under the First Amendment to the United States Constitution, and the Florida Constitution.

65. All conditions precedent to the institution and maintenance of this cause of action have occurred or have been performed.

66. The acts, practices and jurisdiction of Defendants as set forth herein, were and are being performed under color of state law and therefore constitute state action within the meaning of the Fourteenth Amendment to the Constitution of the United States.

## **COUNT I**

### **UNLAWFUL PRIOR RESTRAINT AND DEPRIVATION**

#### **OF FIRST AMENDMENT RIGHTS**

67. Plaintiffs reallege and incorporate paragraphs 1 through 66, supra, as if fully set out herein.

68. As a result of acts, practices, and customs of Defendants a complete prior restraint has been effected upon the Plaintiffs, and Plaintiffs have been deprived of their First Amendment rights of free expression, in violation of the First and Fourteenth Amendments of the

Constitution of the United States and subject to 42 U.S.C. § 1983.

WHEREFORE, Plaintiffs request this Honorable Court to declare the acts, practices, and customs of the Defendants to violate the aforementioned constitutional rights of the Plaintiffs, to enjoin any further constitutional violations through the conduct of the Defendants, to award Plaintiffs compensatory, consequential, and special damages in an amount to be determined by this Court, plus an award of the costs of this action, attorney's fees for services provided in this action, and such other relief as the Court deems just and equitable.

## **COUNT II**

### **UNLAWFUL ARRESTS**

69. Plaintiffs reallege and incorporate paragraphs 1 through 66, supra, as if fully set out herein.

70. The arrests of Plaintiffs by Defendants was without probable cause, or any reasonable grounds for Defendants to believe Plaintiffs had committed any offense and Defendants were fully knowledgeable and aware that their conduct in effecting said arrests was without any basis in fact, which arrests were effected as an example of the customs, practices, and policies of Defendants and were further effected with callous disregard of Plaintiffs' constitutional rights.

71. As a result of the above described conduct of Defendants, and the unlawful and malicious arrests of Plaintiffs, Plaintiffs were denied their liberty without due process of law in violation of the Fourth, and Fourteenth Amendments of the Constitution of the United States and protected by 42 U.S.C. § 1983.

WHEREFORE, Plaintiffs request this Honorable Court to declare the acts, practices, and customs of the Defendants to violate the aforementioned constitutional rights of the Plaintiffs, to enjoin any further constitutional violations through the conduct of the Defendants, to award Plaintiffs compensatory, consequential, and special damages in an amount to be determined by

this Court, plus an award of the costs of this action, attorney's fees for services provided in this action, and such other relief as the Court deems just and equitable.

### **COUNT III**

#### **UNLAWFUL POLICE MISCONDUCT**

72. Plaintiffs reallege and incorporate paragraphs 1 through 66, supra, as if fully set out herein.

73. At all times relevant to this Complaint, Officers Robert A. Lovering, Ales Rahmings, Ruth Stephenson, Jon E. Solomon, as police officers of the Tampa Police Department, were acting in concert with and under the direction and control of Officers Sophia L. Teague, Gregory L. Stout, Jill Ramsten, and, ultimately, Police Chief Bennie Holder, jointly and severally enforcing the customs, practices, and policies of the Tampa Police Department.

74. Acting under color of law and pursuant to official policy or custom, Officers Sophia L. Teague, Jill Ramsten, Gregory L. Stout, and Chief Bennie Holder failed to instruct, supervise, control and discipline on a continuing basis, the police officers in their duties to refrain from: (1) unlawfully and maliciously harassing a citizen who was acting in accordance with his constitutional and statutory rights, privileges, and immunities; (2) unlawfully and maliciously arresting, imprisoning and prosecuting a citizen who was acting in accordance with his constitutional and statutory rights, privileges and immunities; (3) unlawfully and maliciously assaulting and contacting a citizen or otherwise using unreasonable and excessive force before, during, or after the making of an arrest, whether the arrest was lawful or unlawful; (4) conspiring to violate the rights, privileges and immunities guaranteed to Plaintiffs by the Constitution and laws of the United States and the laws of the State of Florida and (5) otherwise depriving Plaintiffs of their constitutional and statutory rights, privileges, and immunities.

75. Defendants, both directly and indirectly, under color of state law, approved and/or ratified the

unlawful, deliberate, malicious, reckless, and wanton conduct of the police officers heretofore described.

76. As a direct and proximate cause of the acts of Defendants, as set forth in the paragraphs above, Plaintiffs suffered physical injury, loss of income, medical expenses, and severe mental anguish in connection with the deprivation of their constitutional and statutory rights guaranteed by the First, Fourth and Fourteenth Amendments of the Constitution of the United States and subject to 42 U.S.C. § 1983.

WHEREFORE, Plaintiffs request this Honorable Court to declare the acts, practices, and customs of the Defendants to violate the aforementioned constitutional rights of the Plaintiffs, to enjoin any further constitutional violations through the conduct of the Defendants, to award Plaintiffs compensatory, consequential, and special damages in an amount to be determined by this Court, plus an award of the costs of this action, attorney's fees for services provided in this action, and such other relief as the Court deems just and equitable.

#### **COUNT IV**

#### **UNCONSTITUTIONALITY OF "FIRST AMENDMENT ZONE"**

77. Plaintiffs reallege and incorporate paragraphs 1 through 66, supra, as if fully set out herein.

78. The City of Tampa, through the adoption of municipal legislation, has created a "First Amendment Zone" which is a remote and undesirable area distant to facilities utilized as public forums which is designed to purportedly satisfy the requirement that citizens be allowed to express their First Amendment rights at said public forums.

79. The creation of this "First Amendment Zone" violates the rights guaranteed Plaintiffs by the Florida and United States Constitution in that the municipal legislation purportedly creating such a zone does:

- a. abridge and restrain the Plaintiffs' rights to free expression as guaranteed by the First and Fourteenth Amendments to the United States Constitution and Article I, Section 4 of the Florida Constitution;
- b. constitute a prior restraint on such expression;
- c. constitute an impermissible "chilling effect" on constitutionally protected speech and expression;
- d. deny equal protection of the law in that the legislation is arbitrary, oppressive and capricious and unreasonably requires the Plaintiffs to submit to controls not imposed on other similarly situated businesses;
- e. impose regulations which are arbitrary and capricious as applied to each individual;
- f. impose regulations which are an unlawful exercise of the state's police power in that there is no substantial relationship to the protection of the public health and welfare or any legitimate governmental objective and are based on an improper predicate;
- g. impose regulations which are vague and indefinite and fail to properly define all phrases set forth therein, and also fail to set out distinct criteria, thus leaving persons of common intelligence to guess as to its meaning and differ as to its application;
- h. unconstitutionally infringe on Plaintiffs' rights to free association;
- i. impermissibly delegate legislative and judicial authority to administrative employees;
- j. grant unbridled discretion to administrative employees and/or law enforcement officers;
- k. lack adequate procedural safeguards and fail to provide for prompt judicial



review;

l. manifest an improper purpose in that the legislation creating the “Zone” is not content-neutral nor unrelated to the suppression of free speech;

m. impose restrictions on First Amendment freedoms that are overbroad and far greater than are essential to the furtherance of any alleged government interest;

WHEREFORE, Plaintiffs request this Honorable Court to declare the adoption and enforcement of the legislation creating the purported “First Amendment Zone” to violate the aforementioned constitutional rights of the Plaintiffs, to enjoin any further constitutional violations through the conduct of the Defendants in enforcing the subject legislation and to award Plaintiffs nominal damages in an amount to be determined by this Court, plus an award of the costs of this action, attorney’s fees for services provided in this action, and such other relief as the Court deems just and equitable.

### **DEMAND FOR JURY TRIAL**

80. Plaintiffs demand trial by jury on all issues so triable.

Respectfully submitted, this 1<sup>st</sup> day of November, 2002.

By \_\_\_\_\_

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