

A COMPLAINT UNDER THE CIVIL RIGHTS ACT,
42 U.S.C. 1983

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:

LANCELOT URILEY ARMSTRONG, PRO-SE,

Plaintiff,

v.

Acting Sheriff, etc. and Former Sheriff

KEN JENNE, SHERIFF B.S.O.,
BROWARD SHERIFF OFFICE,
TERRANCE O. LYNCH, ESQ.,
RANDY SMITH, CAPTAIN,
X.O. LT. SCHLEGEL, ADMINISTRATIVE,
D. WILLIAMS, SERGEANT,
MONICA BLAIR, DEPUTY, IN THEIR
OFFICIAL CAPACITY AND IN THEIR
PERSONAL AND INDIVIDUAL CAPACITY,

Defendants.

**PLAINTIFF'S 1983 CIVIL RIGHTS COMPLAINT,
JURY TRIAL DEMAND AND INJUNCTIVE RELIEF SOUGHT**

The Plaintiff, LANCELOT URILEY ARMSTRONG, acting in
Pro-Se form sues the Defendants named in the caption hereof
and alleges:

1. ^{*Former Sheriff*} Ken Jenne, Sheriff B.S.O. *and acting Sheriff, etc.*
Broward County Sheriff's Office
2601 W. Broward Blvd.
Fort Lauderdale, FL 33312
2. Attorney Terrence O. Lynch
Broward County Sheriff's Office
2601 W. Broward Blvd.
Fort Lauderdale, FL 33312

3. Captain Randy Smith
Broward County Main Jail
555 S.E. 1st Avenue
Fort Lauderdale, FL 33301
4. X.O. Lt. Schlegel
B.S.O. Main Jail
555 S.E. 1st Avenue
Fort Lauderdale, FL 33301
5. Sergeant D. Williams
B.S.O. Main Jail
555 S.E. 1st Avenue
Fort Lauderdale, FL 33301
6. Deputy Monica Blair
B.S.O. Main Jail
555 S.E. 1st Avenue
Fort Lauderdale, FL 33301

In their official capacity and in their personal and individual capacity.

STATEMENT OF THE FACTS

1. Plaintiff, LANCELOT URILEY ARMSTRONG, acting in Pro-Se form, Plaintiff is currently a state prisoner incarcerated at Union Correctional Institution. Plaintiff was confined to the custody and care of the Florida Department of Corrections since 1990. Plaintiff was sent back to the custody of Broward County Sheriff's main jail correctional facility June 4, 2004, for re-sentencing trial before a new jury, at all times relevant to this action.

2. Defendant, MONICA BLAIR, is employed by the Broward County Sheriff's Office at the B.S.O. main jail is/was responsible for assisting complainant on the free legal telephone calls. Her duties also include the review and log the telephone numbers or aid overseeing the staff instructing the deputies which inmates was approved to use the Pro-Se free legal phone on the 7th floor.

3. Defendant, SGT. D. WILLIAMS, is employed by the B.S.O. as the Sergeant for the 7th Floor. As such, Defendant, SGT. D. WILLIAMS, is responsible for all aspects of security and the daily operations of the 7th floor. He is also responsible for care and welfare of all inmates and prisoners confined under his authority on his shift.

4. Defendant, X.O. LT. SCHLEGEL, is employed by the B.S.O. as the Administrative Lt. for the main jail correctional facility. As such, Defendant, LT. SCHLEGEL, is responsible for all aspects of security and the daily operations of the main jail. He is also responsible for care and welfare of all inmates and prisoners confined under authority.

5. Defendant, CAPTAIN RANDY SMITH, is employed by B.S.O. as the Administrative Captain for the main jail correctional facility. As such, Defendant, CAPTAIN RANDY

SMITH, is responsible for all aspects of security and the daily operations of the Broward County main jail facility. He is also responsible for care and welfare of all inmates and prisoners confined under his authority.

6. Defendant, ATTORNEY TERRENCE O. LYNCH, is employed by the Broward County Sheriff's Office as Assistance Legal Counsel Department of Legal Affairs. Defendant, ATTORNEY TERRENCE O. LYNCH, is/was responsible for reviewing legal complaint at the B.S.O. main jail correctional facility.

7. Defendant, SHERIFF KEN JENNE, is elected Sheriff Broward County, State of Florida. Defendant, KEN JENNE, is responsible for all aspects of administrating the main jail correctional system and is responsible for all inmates and prisoners in the Sheriff custody, care and welfare of all inmates and prisoners housed under the custody of the Broward County Sheriff.

8. Between 1990/and present 2007, Plaintiff was confined in the F.D.O.C. death row unit at Union Correctional Institution, upon Court Order June 4, 2004, Plaintiff under the custody, care and supervision of all listed Defendants herein. During this period of time, Plaintiff has been under a sentence of death from a flaws

conviction in the 17th Judicial Circuit, Broward County, Florida.

9. Plaintiff has overcome dyslexia to teach himself the law and has actively participated in the researching and drafting of appellate issues. Additionally, Plaintiff was a litigant on a Pro-Se basis.

10. Plaintiff is originally from Jamaica. Therefore nearly all of Plaintiff's friends and family are outside the United States. The death row unit has telephone access, but death row prisoners are restricted from using the telephone, except in cases of emergency and court ordered access and to make legal telephone calls.

11. Plaintiff, due to the distance and cost incurred for loved ones and friends to travel to central Florida, rarely, if ever, receives a visit.

12. Plaintiff's sole means of communicating and maintaining a bond with friends and loved ones, as well as discussing legal issues with attorneys, investigators, and legal aid, is through writing letters and through the free legal telephone.

13. Under Florida law, prisoners housed under a death sentence in the death row unit have no official classification. The death row unit is classified as

administrative confinement. For the purpose of possessing and maintaining personal property, with very few exceptions, death row inmates and prisoners have been guided by the rules and limits for population inmates.

14. Under Florida Law F.A.C. 33-602; 220, administrative confinement is defined as temporary segregation of inmates from population pending other formal decision such as disciplinary confinement, closed management, protective management or transfer. Under Florida law, it seems the longest a prisoner can be housed in administrative confinement status is for ninety (90) days.

15. Despite the unofficial administrative confinement status, the death row unit is not specifically governed by any set rules that apply to one specific inmate classification unit 1998 when Michael More Former Security F.D.O.C. prisoners on death row instead of being confined to a 6 X 9 foot cell were able to live in a manner similar to and maintain, with very few exceptions, the same number and type of personal property as prisoners in general population.

16. On November 24, 1999, Captain Branham circulated a memo stating that Michael More had instructed to

confiscate from all prisoners housed on death row, all regular ink pens and art pens as a "security risk", citing that inmates housed in administrative confinement, protective custody and controlled/closed management were not allowed to possess pens.

17. On November 29, 1999, all regular pens and pencils were collected and new flexible "security pens" made of soft rubber were issued. The pens are very short and extremely difficult to grip and bend when pressed down in order to write.

18. During the thirty years prior to November 29, 1999, prisoners housed in death row unit were allowed to possess and use any type of pen. It should also be noted that all other changes in property since 1999 coincided with changes in the list for general population, all changes except this one.

19. Plaintiff, on his writing hand, at the age of twelve (12), lost 2½ fingers and suffered severe nerve damage in the hand and wrist. Prior to November 29, 1999, Plaintiff had taught himself to write legible enough to communicate with a long pen that could be braced against his wrist to compensate for the missing fingers and nerve damages.

20. The new flexible pens are so small and bend so easily that Plaintiff, given his handicap, can hardly hold the pen to write to his attorney and friends. As the new pen cannot be braced against the wrist, writing cause severe pain to the entire hand. Many mornings after writing very little, Plaintiff cannot even bend or flex his fingers or wrist.

21. Plaintiff grievances pointing out his handicap and how the new rubber pens had hampered his ability to communicate with lawyers and friends. Furthermore, please ask that appropriate measures be taken to assist Plaintiff so he could continue to write said grievances. Reflect that the pens were of the extremely lowest quality.

22. Many pens ran out of ink within an hour and/or would not write at all. Numerous pens literally broke at the tip when writing, when there was no "security pens" available, "regular ink pens" was allowed as needed to complete legal work and otherwise. There was hindrance.

23. Plaintiff's emergency grievances and requests at the Broward County main jail facility stating the urgency concern accordance with obligation, instead some deputies refusal to follow the sergeant approval. No investigation was conducted into complainant grievances trying to redress

deprivation to preparing meaningful documents in court.
Result of retaliation.

24. Plaintiff asking for a medical pass under the Americans With Disabilities Act of 1990, so Plaintiff could be provided the appropriate tools and equipment which would allow Plaintiff to continue to freely communicate with his friends, loved ones and lawyers and Consular of Jamaica. Security stated A.D.A. claim on medical needs "Armor Correctional Health Service, Inc. inmate health care medical in pen pass, allow B.S.O. security to replace Plaintiff normal ink pens and highlighter, and marker pens when needed.

25. Plaintiff is often indigent and are placed into a catch 22 situation of having to write request to administration and ask X.O. LT. SCHLEGEL, for a new regular ink pen whenever Plaintiff's normal pen ran out of ink or seek new normal ink pens from deputies at times. Many times Plaintiff unable to get a normal ink pen replacement for weeks.

26. Appropriate arrangement was made under A.D.A. Disability Act to assist Plaintiff until SGT. D. WILLIAMS, Retaliation _____ advised deputies not commended Plaintiff free legal phone apprived access, which he

failure to honor court order. Not only has this cost him money but has also put him in the horrible position of owing attorney's fees and private investigators and legal aid.

27. Due to the severe pain and discomfort caused by illegal hindrance which subjected Plaintiff to exercised his legal rights by writing grievances and requests and grieved access to the free legal Pro-Se telephone abrogation cause continuous hindrance from preparing legal documents in time to file meaningful motions and appeal motion for new trial and other petitions.

28. Plaintiff received court order access to free legal telephone result of violation since 2005, on and off. As soon as officials approval authorized said phone access SGT. D. WILLIAMS order illegal hindrance contrary to B.S.O. main jail obligation toward the Plaintiff.

29. Plaintiff always humble his self and able to receive many verbal approval at times, a proper investigation shall reflect on the above cause. And how the hindrance block phone access so Plaintiff could contact his counsels to verbally change his research and thoughts regarding the re-sentencing trial before a new jury. And

filing appeal on Pro-Se assistance with outside legal aid, and private investigators.

30. SGT. D. WILLIAMS order deputy on 4/19/07 to confiscation of Plaintiff normal ink pen and placed it into property room by property supervisor. Plaintiff explain that pen was need to do legal writing back and forth in court. Plaintiff show the pen pass which was apprived since 11/7/05, order to use normal ink pen.

31. Plaintiff bona fide complaints resulted further retaliation April 26, 2007. Plaintiff was placed on 8th floor and deprived Plaintiff basic privileges and constitutional rights over 17 years ~~not~~^{LA.} disciplinary history. Plaintiff did not sentence yet!

32. Under the law F.A.C. the Florida Department of Corrections is required to provide assistance to inmates with physical impairment and/or handicaps to help them maintain communication with lawyers and loved ones.

33. Plaintiff alleges SGT. D. WILLIAMS did deliberately and knowingly have regular writing equipment removed from him and numerous times hindered free legal phone calls which administrative failed to respond to grievances in order to hinder due process rights to redress the issues properly in court.

34. CAPTAIN RANDY SMITH creative arbitrary and capricious whims Defendant SMITH is in knowing violation of Plaintiff's statutory and/or constitutional rights.

35. Plaintiff alleges that the above-named Defendants have abrogated their constitutional and statutory obligations under the A.D.A. and/or F.A.C. by flaws advised and used security issue wrongly as a pretext on denying Plaintiff the appropriate accommodations in response to his complaints about the hindrance of normal ink pens and pencils and block free legal phone calls at times.

36. Defendants', KEN JENNE, ATTORNEY TERRENCE L. LYNCH, CAPTAIN RANDY SMITH, and ADMINISTRATIVE LT. SCHLEGEL, failure to correcting misconduct which causing severe pain and aggravating pre-existing nerve damage and inability to write things in a timely manner and/or by refusing to acknowledge that for the purpose of writing and typing up documents and phone access Plaintiff's amputated fingers and nerve damage is a handicap.

37. Plaintiff alleges that each of the Defendants' indirect and directly have instituted their own policies without notice which are contrary to existing F.A.C. regulations and/or which violate Plaintiff's and other inmates' First Amendment right guaranteeing meaningful

access to the court and attorneys and free and unfettered correspondence with friends, family and loved ones. Plaintiff's civil rights Case # 05-018672(11) hearing date June, 2006 and other court dates Defendants deliberately and willfully block Plaintiff from access to the courtroom to litigating his case.

38. Plaintiff's, Lancelot Armstrong v. Ken Jenne, Case #05-18672(11) before Judge Barry E. Goldstein, Order of Dismissal at Case Management no parties appearing resulted of continuous retaliation bias practices by keep Plaintiff all day in the court holding cell from entry to this courtroom to litigating his own Pro-Se civil case.

39. Plaintiff April 12, 2007 legal letter to Sheriff's ATTORNEY TERRENCE O. LYNCH, RE: illegal hindrance and failure to honor court order which compel compliance to B.S.O. main jail legal obligation toward Mr. Plaintiff's due process rights concerns failure to allow proper law library access per court order.

40. Defendants' actions causing severe pain and aggravating pre-existing nerve damage and inability to write things in a timely manner and/or refusing to acknowledge that for the purpose of writing Plaintiff's amputated fingers and nerve damage is a handicap.

41. Plaintiff alleges that each of the Defendants have instituted their own policies which are contrary to Sunshine Law and existing F.A.C. regulations and/or which violate Plaintiff's First Amendment right guaranteeing meaningful access to the court and attorneys and free and unfettered correspondence with friends, family and loved ones. Plaintiff submits that each Defendant has deliberately and willfully maintained rules, policies, practices and procedures which denied Plaintiff and other inmates their right to meaningful access to the court and the ability to correspond freely with the outside world by applying a rule to prisoner, which is in fact not applicable to Plaintiff, denying Plaintiff's access to standard writing utensils which do not break within the first hour of use and continuous hindrance and further due process rights violation by systematically, routinely and arbitrary denying Plaintiff's request and grievances without ever conducting a proper and thorough investigation into the facts on Plaintiff's complaints but instead based solely on superficial observations and/or by not answering legal requests and grievances at all.

42. Plaintiff alleges each Defendant maintains a bias practice, policy and procedure wherein an inmate and

prisoner can never gain a proper review of allegations set forth in a grievance by either giving the Plaintiff's flaws legal advise and continuous "run-around as by Defendant's CAPTAIN RANDY SMITH and X.O. LT. SCHLEGEL, in this instance by never answering urgency grievance as was done by each Defendant or by providing some superficial answer without doing any actual investigation as was done by each Defendant. Plaintiff alleges that all of the Defendants unconstitutional actions, inactions and/or omissions in depriving Plaintiff and other inmates proper review and resolution of an alleged grievance were/are done maliciously and with deliberate indifference and with callous and reckless disregard for Plaintiff's known rights, so as to justify the imposition of punitive damages.

43. Plaintiff alleges that KEN JENNE is legally responsible for and liable for all of the actions, inactions and/or omissions of Defendants, TERRENCE O. LYNCH, ESQ., CAPTAIN RANDY SMITH, X.O. LT. SCHLEGEL, and SGT. D. WILLIAMS, in that Defendant, KEN JENNE, has delegated his legal authority and responsibility to each Defendant. Moreover Plaintiff alleges that Defendant, KEN JENNE, had and/or has full knowledge of the fact that

Plaintiff have had this arbitrary and capricious rule wrongly applied to Plaintiff.

44. Plaintiff alleges that Defendants, KEN JENNE and CAPTAIN RANDY SMITH, has failed to adequately train and supervise each employee of the B.S.O. Department of Detention and other Broward County Sheriff's Official. Thereby making Defendants, SHERIFF KEN JENNE and CAPTAIN RANDY SMITH, responsible and liable for each illegal and unconstitutional action, inaction and/or omission of each Defendant in their ability to investigate, recognize and properly classify a handicapped individual under the A.D.A. and then see that appropriate care is assigned to the handicapped individual. Furthermore, Plaintiff alleges that medical pass and court orders that all Defendant, KEN JENNE, knew or should have known about Plaintiff allegation about the Defendant's violation of fundamental constitutional laws, and giving Plaintiff the "run-around" and never compelling staff compliance to all aspects of laws, a proper review and investigate Plaintiff claims and needs, yet Defendant, KEN JENNE, did nothing to correct the situation.

45. Plaintiff alleges that Defendants, SGT. D. WILLIAMS, X.O. LT. SCHLEGEL, CAPTAIN RANDY SMITH, and ATTY.

TERRENCE O. LYNCH, did knowingly, intentionally and willfully abrogate their lawful duties and obligations in refusing to properly handle, investigate and/or administrative legal claims that related to wrongful hindrance, all to ensure Defendant, KEN JENNE, was able to maintain the policy of hindered the Plaintiff from access free legal telephone calls at times and hindering the use of normal ink pens and pencils and block Plaintiff mails at times. Further illegally block Plaintiff from proper access to the law library. Plaintiff further alleges that each Defendant's actions, inactions and/or omissions in working to maintain and protect Defendants, KEN JENNE and CAPTAIN RANDY SMITH, policy was done maliciously and with deliberate indifference and with callous and reckless disregard to Plaintiff's known legal rights and privileges, which official approval and court orders was directed to bringing all violations in compliance resulted above-named Defendants in violation of Plaintiff's rights guaranteed under the Eighth Amendment.

46. As a result of the unconstitutional actions and/or inactions of each Defendant name herein, Plaintiff alleges that he suffered substantial physical pain, mental and emotion anguish and distress.

COUNT I
FIRST CAUSE OF ACTION

47. Plaintiff adopts, incorporates and realizes each and every count and allegation set forth and contained in paragraphs 1 thru 46, Supra. Plaintiff submits that each of the named Defendants did willfully and knowingly conspire to deny Plaintiff due process rights, under the A.D.A. Disability Act. Refusing to investigate, evaluate and administer Plaintiff's claims of a pre-existing medical status and his allegation that the new rubber security pens were re-aggravating Plaintiff's condition causing Plaintiff great pain and suffering and denying Plaintiff right to normal replacement ink pens and pencils to correspond freely with the outside world, and further hindering free legal telephone access at times which further violates court orders.

COUNT II
SECOND CAUSE OF ACTION

48. Plaintiff adopts, incorporates and realizes each and every allegation set forth and contained in paragraphs 1 thru 47, Supra. Plaintiff submits that the actions and/or inactions of each of the named Defendants in denying Plaintiff legal requests to make copies to meet - filing deadline on legality issues, hindered legal aid

assistance, hindered private investigators visitation/meeting to aid Plaintiff's preparation on pending criminal cases ignored official approval at times cause infringement, obstructing justice, and denying A.D.A. Disability Act. The tools and equipment allowed under the law, for corresponding, did deprive Plaintiff of his constitutional right to meaningful access to the courts and his constitutional right, and international rights under Article 36 V.C.C.R. To freely correspond with his Consular, and legal counsel, and legal aid, and investigators, as well as friends, family and loved ones. Contrary to the First and Fourteenth Amendments to the United States Constitution.

COUNT III
THIRD CAUSE OF ACTION

49. Plaintiff adopts, incorporates and realizes each and every count and allegation set forth and contained in paragraphs 1 thru 48, Supra. Plaintiff submits that the actions, inactions and/or omission of each of the named Defendants in denying Plaintiff proper review and/or evaluation and their complete failure to investigate deputies and other officials actions which was done arbitrarily and capriciously and knowingly and

intentionally in deliberate indifference to Plaintiff's constitutional and international rights to adequate medical care contrary to the Eighth and Fourteenth Amendments to the United States Constitution.

COUNT IV
FOURTH CAUSE OF ACTION

50. Plaintiff adopts, incorporates and realizes each and every count and allegation set forth and contained in paragraphs 1 thru 49, Supra. Plaintiff submits that the actions and/or inactions of each named Defendant in denying the Plaintiff proper legal access to preparing meaningful documents to file in court, continuous hindrance of proper tools and equipment under the A.D.A. Disability Act allowing Plaintiff to correspond, free of pain and suffering, and that said denial was done without proper review, investigation and examination of his medical needs and was arbitrary and capricious and constituted a denial of Plaintiff's due process protected liberty interest to adequate medical care and assistance and access to correspondence, free of pain and suffering, contrary to the Fourteenth Amendment to the United States Constitution.

COUNT V
FIFTH CAUSE OF ACTION

51. Plaintiff adopts, incorporates and realizes each and every count and allegation set forth and contained in paragraphs 1 thru 50, Supra. Plaintiff submits that the actions and/or inactions of each Defendant is abrogating their lawful and constitutional duties and obligations by creative bias practice to impeding Plaintiff's legal forum, and hindered basic privileges, when each Defendant knows or should have known by complainant grievances and court orders and medical pass that under the color of law their violations of said laws was abusive and in contempt of court which failure to correcting abuses practice which does cause severe nerve damage to the fingers, hand and wrist and that each of the Defendants' actions and/or inactions in failing to proper investigate and answer all grievances so Plaintiff could redress said failure in court complaints that could possibly be linked to the forced long term use of said security pens was/is in deliberate indifference to all Plaintiff bona-fide complaints and health needs, contrary to the Eighth and Fourteenth Amendments to the United States Constitution.

DAMAGES

52. Plaintiff seeks monetary damages from each of the named Defendants, individually and severally, (all Defendants being sued in their official and individual/personal capacity) as follows:

1. Plaintiff seeks compensatory damages from each Defendant in the amount of one hundred thousand dollars (\$100,000.00).

2. Plaintiff seeks punitive damages from each Defendant in the amount of three hundred thousand dollars (\$300,000.00).

RELIEF REQUESTED

53. Plaintiff seeks the following relief:

1. Trial by jury on each and every count and allegation set forth herein.

2. Injunctive relief in the form of enjoining order which:

a. Order the F.D.O.C./B.S.O. Broward County Sheriff's ~~Department~~ ^{Department} Liaison ~~Defendant~~ of Detention to provide Plaintiff with a full medical examination by a independent licensed doctor (a hand and foot specialist) and (a eye and throat specialist) in no way associated with the "Florida Department of

Corrections", and "Broward County Sheriff's Office and their Department of Detention main jail facility" to review Plaintiff's medical status.

b. Order the "Florida Department of Corrections" and the "Broward County Sheriff's Office and their employees" to provide 5 days 30 minutes weekly access to the free legal telephone Pro-Se so Plaintiff can call his legal team without no further hindrance to discuss appellate issues and preparing witnesses and other legal material.

c. Order the "Florida Department of Corrections" and the "Broward County Sheriff's Office, and their main jail employees" to provide Plaintiff with daily access to a word processor with a handicap accessible keyboard.

d. Prohibit the "Florida Department of Corrections" and the "Broward County Sheriff's Office, and their main jail employees" from forcing Plaintiff to continual use of the short rubber "security pens", and provide use of standard ink pens and pencils as available to

Plaintiff in general population, and allow Plaintiff to buy his own normal replacement ink pens and pencils and highlighter marker pens.

e. Order F.D.O.C./B.S.O. state's agencies department to abide by the statutory mandates of 33-3 F.A.C. and all aspects of the laws.

f. Order an urgency criminal investigation regard the continuous illegal infringement and hindering Plaintiff's - preparation to file meaningful paper in courts and proper access to the courtroom and litigate his own - Pro-Se affiant proceedings and to aid and assist in his own defense.

g. Any other relief this court deems adequate and just.

Date: Oct. 24, 2007, Respectfully submitted:



Vince Marciano 10-24-07

Lancelot Armstrong, Pro-Se.
Lancelot U. Armstrong #500408148
Broward County Main Jail 8-B-2-6
P.O. Box 9356
Fort Lauderdale, FL USA 33310

I hereby declare under penalty of perjury that the foregoing Statement of Fact contained herein are true and correct.



Vince Marciano 10-24-07

Signed this 24th day of Oct., 2007.

Lancelot Armstrong, pro se. Plaintiff
Lancelot U. Armstrong, DOC #693504

PARTIES

Plaintiff: Lancelot Uriley Armstrong #500408148
Broward County Main Jail
8-B-2-6
P.O. Box 9356
Fort Lauderdale, FL 33310

Defendants: *Former Sheriff*
Ken Jenne *and acting Sheriff, etc.*
Sheriff Broward County
2601 W. Broward Blvd.
Fort Lauderdale, FL 33312

Terrence O. Lynch, Esq.
Assistant Legal Counsel
Department of Legal Affairs
2601 W. Broward Blvd.
Fort Lauderdale, FL 33312

Randy Smith, Captain
Broward County Main Jail Facility
555 S.E. 1st Avenue
Fort Lauderdale, FL 33310

Lt. Schlegal, Administrative LT.
Broward County Main Jail Facility
555 S.E. 1st Avenue
Fort Lauderdale, FL 33310

Sergeant D. Williams
B.S.O. Main Jail
555 S.E. 1st Avenue
Fort Lauderdale, FL 33301

Deputy Monica Blair
555 S.E. 1st Avenue
Fort Lauderdale, FL 33301

Certificate of Service

I Hereby certify that a true and correct copy of the foregoing petitions Re: Plaintiff's 1983, Civil right Complaint, has been furnished via B.S.O. main Jail facility / u.s. mail/out to the Clerk of Court, Florida, Southern Federal Court house Square 301 north Miami Avenue, Miami, Florida . 33128 - 7788.

which enclosed 7, copies of Civil action,

Complainant Respectfully seek a summons to a company each complain to Defendants names enclosed on the Civil complaint 1983, with the case number.

and a copy was sent to: Consulate General of Jamaica, 842 Ingraham Building, 25 S.E. 2nd street, Miami, Florida. 33131; and Governor & Florida Attorney General, West Palm Beach, Department of legal Affairs; and State Attorney, Broward County Court house, 201 S.E. 6th Street, Fort Lauderdale, Florida. 33301; and Broward Circuit Court Honorable Judge: Michael L. Gates, Broward Court house 201 S.E. 6th Street, Room #. 6870, Fort Lauderdale, Florida. 33301, Sworn And Subscribed To on this 25th day of Oct. 2007.

By: Lancelot Armstrong, Pro-SE. Affiant.
Lancelot Wilely Armstrong, #. 500408148
8-B-49, P.O. Box 9356,
Fort Lauderdale, Florida. 33310