

Verified Complaint [Incident Date: 12 April 2019]

#1 On or about 10:15 pm or 22:15 MT in the Pinalley County Jail, a "surprise stake down" or inspection occurred in Unit 2C1. Officer Jurk, the on-duty officer it appears for that shift, announced a "lock down" around 10:00 pm/22:00 MT and within a few minutes about six to seven (6-7) other officers lined up on the lower level. All inmates, to include myself [Trenton Rogers Garmon, Esquire], were directed to sit in the common area which consists of twenty (20) square tables and eighty (80) plastic, arm-handled chairs.

#2 Among the officers inspecting was Officer Jurk, Officer Skaggs, and Officer Caminero. The spelling of Officer Caminero's name may be incorrect, yet his identity can easily be discovered with certainty. Caminero appeared to be in charge of the inspection. Also present was William Goodman, former tanker with the United States Army. Mr. Goodman was an inmate at the time having been arrested and detained temporarily for trespassing in a public park. Also present was Joshua Nauri whose parents own a fine dining restaurant in Saint Petersburg, Florida. Mr. Nauri was a Chef professionally at Victoria Hotel & restaurant in New York City directly across

from Central Park. The hotel Mr. Nouri served as a chef was featured in the well-known movie, "Home Alone." Mr. Goodman and Mr. Nouri are from Boston, Massachusetts and Saint Petersburg, Florida, respectively.

#3 The "shake down" consists of (1) a personal, bodily pat down and (2) a bunk tossing or inspection of the bunk bed rack area each inmate has/is assigned.

#4 The inmates were directed to six to seven (6-7) wherein each inmate had an officer do a personal "pat down" and the inmates in batches of six to seven (6-7) were directed to sit in a chain in the common area. After all of the inmates were inspected bodily and no unauthorized contraband discovered, the guards transitioned to the second floor where the inmate bunk or housing area, within the open bay, are located.

#5 During the time the other guards "tossed" or searched the bunks, Officer Caminero sat on a table and began what appeared to be an open, public conversation with the entire group of inmates. He opened telling the joke: "Why don't cats like trees? Because they bark," he said.

His rapport was not unprofessional, nor inappropriate at this point. Yet the following context is requested to be considered as to its lawfulness, professionalism (or lack thereof), as well as any indication that his perspective and leadership may serve as a potential, yet grave liability.

#6 During the time he was conversing, as the other guards were searching the bunk area, Officer Caminero also used the term or phraseology "Goddamn" no less than three (3) times clearly invoking verbally some form of authority or perspective, which involves, as an agent of the county or state an inappropriate interjection of religion or irreligion, either of which are inappropriate and arguably illegal as an Unconstitutional entanglement. Meaning his First (1st) Amendment rights to call upon or damn a "god" or deity should not be interjected into his duties or a situation in which he as an agent is asserting such to other citizens.

#7 Following Officer Caminero's likely unconstitutional violation of the Judicial Doctrine of Separation of Church and State, he began to convey what sounded like an unwritten policy or at minimum

a threat, albeit likely a violation of jail policy, Florida case and statutory law, as well as Federal Law. Officer Caminero then said or acknowledged: "You guys could take over this place." Clearly there is a need for guards to have control and feel safe as they ensure the inmates understand order.

Yet the following line or point of reference appears or actually reeks of being inappropriate, objectively illegal and a cause for concern which hereafter the Pinellas County Sheriff's Department has actual and legal notice of.

#8 To wit: "If something happens, Caminero asserted, "one of you mother fuckers are going to die."

#9 There was absolutely no context asserted like, "If deadly force is necessary one of you may die because we are empowered to use deadly force." Rather, Officer Caminero made a blanket murderous threat which he followed up by asserting a discriminatory classification by then stating: "And you know that no one in orange will win against one of us white shirts."

#10 This murderous threat and unconstitutional classification has an eerily similar and troubling parallel to the civil rights claims

oppressed citizenry, minorities and immigrants have been voicing concern over with regards to all stripes of law enforcement. An individual born with brown or pale skin, as with any other method of classification, cannot and per the Constitution shall not be valued as less or lower which somehow then justifies making a blanket murderous threat. Climates do not need to be a "protected class" for each of their individual constitutional rights to be honored and protected.

#11 Therefore please note this incident and the related concern and receive same as a formal complaint and request for an administrative hearing regarding same.

#12 These actions on their face are a violation of the Florida Model Jail Standards, the recommendations of the State Jail Standard Committee, the policies and procedures set out in the climate Handbook and climate PREA Educational Pamphlet, Florida law and the United States Constitution.

WHEREFORE, the undersigned Complainant does request (i) an open investigation, (ii) a formal hearing on the matter, (iii) the preservation of any and all video and audio from 9:00 pm on 21:00 mt on 12 April 2019 to midnight that

evening for unit 2C1 and (iv) any other claims be preserved by this filing and its notices as contained herein, as well as the related safety threat Officer Cammeros may pose.

Respectfully submitted with a right to amend being herein asserted should a form or other method of documentation be needed this the — day of April 2019.

Trenton Garmon

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* Licensed to practice law before
multiple Federal Courts, Federal
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Certificate of Service

I do hereby certify that upon release a copy of the foregoing will be provided to:
(1) Sheriff Bob Gualtieri, (2) David Danzig, Colonel of Department of Detention and Correction, (3) Pinellas County.

District Attorney, (4) Florida State Attorney General
and (5) Presiding Circuit Court Judge for
Pinellas County.

Trenton Garmon

TRENTON GARMON, Esq.

Post Script Notice: A draft copy, also
handwritten, of this Verified Complaint has
been retained by the complainant.

I, Trenton Garmon, do swear and affirm
the contents herein as true and correct
and will reassert this oath as to the
veracity of these allegations at any time
under penalty of perjury.

Trenton Garmon

TRENTON GARMON