

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION

CIVIL RIGHTS COMPLAINT FORM  
TO BE USED BY PRISONERS IN ACTIONS UNDER 42 U.S.C. § 1983

Willie CHARLES FORD Jr

Inmate # 110000619  
(Enter full name of Plaintiff)

vs.

CASE NO: 4:11 cv 514-WS/WCS  
(To be assigned by Clerk)

- 1) DFC. TODD LUSSIER #904  
(Columbia County Sheriff's Office)
- 2) S.A. ROBBIE SHOTWELL  
(F.D.L.E Jasper Field Office)

(Enter name and title of each Defendant.)

If additional space is required, use the  
blank area below and directly to the right.)

ANSWER ALL QUESTIONS ON THE FOLLOWING PAGES:

I. PLAINTIFF:

State your full name, inmate number (if applicable), and full mailing address in the lines below.

Name of Plaintiff: Willie CHARLES FORD Jr.  
 Inmate Number: 110000619  
 Prison or Jail: Jail  
 Mailing address: 305 S.W Pine AVE  
Live Oak, FL 32064

II. DEFENDANT(S):

State the name of the Defendant in the first line, official position in the second line, place of employment in the third line, and mailing address. Do the same for every Defendant:

- (1) Defendant's name: TODD LUSSELL  
 Official position: Corp.  
 Employed at: Columbia County Sheriff's Office  
 Mailing address: 4917 U.S Hwy 90 EAST  
Lake City, FL 32025
- (2) Defendant's name: Columbia County Sheriff's Office  
 Official position: \_\_\_\_\_  
 Employed at: \_\_\_\_\_  
 Mailing address: 4917 U.S Hwy 90 EAST  
Lake City, FL 32025
- (3) Defendant's name: ROBBIE SHOTWELL  
 Official position: SPECIAL AGENT  
 Employed at: (F.O.L.E) Jasper Field Office  
 Mailing address: P.O Box 1296, 1133 U.S Hwy 41  
Jasper, FL 32052

ATTACH ADDITIONAL PAGES HERE TO NAME ADDITIONAL DEFENDANTS

III. EXHAUSTION OF ADMINISTRATIVE REMEDIES

Exhaustion of administrative remedies is required prior to pursuing a civil rights action regarding conditions or events in any prison, jail, or detention center. 42 U.S.C. § 1997e(a). Plaintiff is warned that any claims for which the administrative grievance process was not completed prior to filing this lawsuit may be subject to dismissal.

IV. PREVIOUS LAWSUITS

NOTE: FAILURE TO DISCLOSE ALL PRIOR CIVIL CASES MAY RESULT IN THE DISMISSAL OF THIS CASE. IF YOU ARE UNSURE OF ANY PRIOR CASES YOU HAVE FILED, THAT FACT MUST BE DISCLOSED AS WELL.

A. Have you initiated other actions in **state court** dealing with the same or similar facts/issues involved in this action?  
Yes( ) No()

1. Parties to previous action:
  - (a) Plaintiff(s): \_\_\_\_\_
  - (b) Defendant(s): \_\_\_\_\_
2. Name of judge: \_\_\_\_\_ Case #: \_\_\_\_\_
3. County and judicial circuit: \_\_\_\_\_
4. Approximate filing date: \_\_\_\_\_
5. If not still pending, date of dismissal: \_\_\_\_\_
6. Reason for dismissal: \_\_\_\_\_
7. Facts and claims of case: \_\_\_\_\_

(Attach additional pages as necessary to list state court cases.)

B. Have you initiated other actions in **federal court** dealing with the same or similar facts/issues involved in this action?

Yes( ) No()

1. Parties to previous action:
  - a. Plaintiff(s): \_\_\_\_\_
  - b. Defendant(s): \_\_\_\_\_
2. District and judicial division: \_\_\_\_\_
3. Name of judge: \_\_\_\_\_ Case #: \_\_\_\_\_
4. Approximate filing date: \_\_\_\_\_
5. If not still pending, date of dismissal: \_\_\_\_\_
6. Reason for dismissal: \_\_\_\_\_

7. Facts and claims of case: \_\_\_\_\_

(Attach additional pages as necessary to list other federal court cases.)

C. Have you initiated other actions (besides those listed above in Questions (A) and (B)) in either state or federal court that relate to the fact or manner of your incarceration (including habeas corpus petitions) or the conditions of your confinement (including civil rights complaints about any aspect of prison life, whether it be general circumstances or a particular episode, and whether it involved excessive force or some other wrong)?

Yes (  ) No (  )

If YES, describe each action in the space provided below. If more than one action, describe all additional cases on a separate piece of paper, using the same format as below.

1. Parties to previous action:
  - a. Plaintiff(s): Willie CHARLES FORD JR.
  - b. Defendant(s): COLUMBIA COUNTY DETENTION CENTER
2. District and judicial division: ~~SOUTHERN~~ NORTHERN DISTRICT / 3<sup>rd</sup> Judicial Circuit
3. Name of judge: \_\_\_\_\_ Case #: 11-88 CF
4. Approximate filing date: FEB, 11, 2011
5. If not still pending, date of dismissal: \_\_\_\_\_
6. Reason for dismissal: \_\_\_\_\_
7. Facts and claims of case: FALSE IMPRISONMENT WHILE INCEANCE RATED

(Attach additional pages as necessary to list cases.)

D. Have you ever had any actions in federal court dismissed as frivolous, malicious, failing to state a claim, or prior to service? If so, identify each and every case so dismissed:

Yes (  ) No (  )

1. Parties to previous action:
  - a. Plaintiff(s): \_\_\_\_\_
  - b. Defendant(s): \_\_\_\_\_
2. District and judicial division: \_\_\_\_\_
3. Name of judge: \_\_\_\_\_ Case Docket # \_\_\_\_\_
4. Approximate filing date: \_\_\_\_\_ Dismissal date: \_\_\_\_\_
5. Reason for dismissal: \_\_\_\_\_

6. Facts and claims of case: \_\_\_\_\_

(Attach additional pages as necessary to list cases.)

#### V. STATEMENT OF FACTS:

State briefly the FACTS of this case. Describe how each Defendant was involved and what each person did or did not do which gives rise to your claim. In describing what happened, state the names of persons involved, dates, and places. Do not make any legal arguments or cite to any cases or statutes. You must set forth separate factual allegations in separately numbered paragraphs. You may make copies of this page if necessary to supply all the facts. Barring extraordinary circumstances, no more than five (5) additional pages should be attached. (If there are facts which are not related to this same basic incident or issue, they must be addressed in a separate civil rights complaint.)

ON 8-4-10 AT APPROX 11:00AM OFFICER TODD LASSIER KNOWINGLY & INTENTIONALLY FABRICATED A PROBABLE CAUSE AFFIDAVIT, TO SECURE A ARREST WARRANT FOR THE PLAINTIFF.

LATER THAT SAME DAY AT APPROX 6:18PM, THE PLAINTIFF WAS ARRESTED AT HIS GIRLFRIEND'S MOTHER APARTMENT IN TALL, FL (445 Applewood Drive) AND TAKING INTO CUSTODY AT LEON COUNTY JAIL.

FOLLOWING THE ARREST OF THE PLAINTIFF F.D.L.E SPECIAL AGENT Robbie SHUTWELL AUTHORIZED F.D.L.E OFFICERS BARB MCGRAW & MIKE KENNEDY TO TAKE PLAINTIFF'S VEHICLE TOWED TO TALLAHASSEE REGIONAL OPERATIONS CENTER, WHERE IT WAS SUBSEQUENTLY SEARCHED.

ON 8-5-10 SPECIAL AGENT Robbie SHUTWELL PETITIONED THE SECOND JUDICIAL CIRCUIT COURT OF TALL, FL & OBTAINED A SEARCH WARRANT FOR THE PLAINTIFF'S VEHICLE (1998 FORD EXPEDITION) WITHOUT ESTABLISHING PROBABLE CAUSE.

ON 8-6-10 AT 10:45AM S.A Robbie SHUTWELL REALIZING HIS MISTAKE GOT'S JUDGE GREG PARKER OF HAMILTON COUNTY TO SIGN HIS PROBABLE CAUSE AFFIDAVIT.

LATER THAT SAME DAY PLAINTIFF WAS TRANSPORTED TO COLUMBIA COUNTY DETENTION CENTER WHERE HE WAS BILLED ON CASE # 10-635

ON 8-7-10 PLAINTIFF WENT TO FIRST APPEARANCE WHERE HE WAS DENIED A BOND WHICH RESULTED IN THE LOSS OF HIS OCCUPATION.

SOMEONE AROUND SEPT. 9 2010, ALL BAILBONDS TOOK POSSESSION OF THE PLAINTIFF'S VEHICLE DUE TO HIS INABILITY TO MAKE PAYMENTS BECAUSE OF HIS INCARCERATION.

ON SEPT. 13<sup>TH</sup> 2010 Plaintiff Received His Discovery For His Columbia County Case # 10-635CF And Noticed Due To A Inventory List That He Was Missing The Accumulated funds of Approx \$6,000.00 From His Middle Console.

ON OCT 4, Plaintiff Was Arraigned & Plea'd Not Guilty.

From OCT 4 - MAY 6, 2011 THE Plaintiff Engaged in litigation. Where As THE CASE WAS ~~not~~ Dismissed. ! But Resulted in THE Plaintiffs Continued Detention For violation of Probation. !

VI. STATEMENT OF CLAIMS:

State what rights under the Constitution, laws, or treaties of the United States you claim have been violated. Be specific. Number each separate claim and relate it to the facts alleged in Section V. If claims are not related to the same basic incident or issue, they must be addressed in a separate civil rights complaint.

- 1) OFFICER TODD Lussier Violated plaintiff's Constitutional Rights Under THE 4<sup>th</sup> & 14<sup>th</sup> Amendments, WHEN He knowingly & intentionally falsified Police Reports in An Attempt to Deprive the Plaintiff of His Freedom & Liberty! By An Unlawful Arrest!
- 2) SPECIAL AGENT Tubbie Strowell Violated plaintiff's Constitutional Rights Under THE 4<sup>th</sup> And 14<sup>th</sup> Amendments, WHEN He Authorized THE illegal seizure OF THE ~~the~~ Plaintiff's Vehicle, & Subsequently illegally searched IT THEREAFTER!

VII. RELIEF REQUESTED:

State briefly what relief you seek from the Court. Do not make legal arguments or cite to cases/ statutes.

THE Plaintiff ASKS THAT THIS COURT Grant Him Relief in THE form OF Re-employment for lost WAGES, Monies spent while incarcerated, As well as Property, And WHATENA THIS COURT See Fit<sup>s</sup> TO Award THE plaintiff FOR Punitive DAMAGES, for pain & suffering & Emotional Distress --!

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS OF FACT, INCLUDING ALL CONTINUATION PAGES, ARE TRUE AND CORRECT.

OCTOBER 5, 2011  
(Date)

Wallie C. Ful Jr.  
(Signature of Plaintiff)

IF MAILED BY PRISONER:

I declare (or certify, verify, or affirm) under penalty of perjury that this complaint was (check one):  
 delivered to prison officials for mailing or  deposited in the prison's internal mail system on:  
the 5<sup>th</sup> day of OCTOBER, 2011.

Wallie C. Ful Jr.  
(Signature of Plaintiff)