

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
OCALA DIVISION

2010 MAR -1 AM 9:55

CLERK, U.S. DISTRICT COURT  
OCALA, FLORIDA

JOSHUA D. ROSEMAN,

Plaintiff,

vs.

CASE NO.:

5:10cv-81-OC-DGRJ

THE SHERIFF OF MARION COUNTY,  
in his official capacity,

Defendant.

\_\_\_\_\_ /

**COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiff, JOSHUA D. ROSEMAN (hereinafter "Roseman"), by and through undersigned counsel, sues Defendant, Sheriff of Marion County, in his Official Capacity (hereinafter "Sheriff"), and alleges as follows:

**JURISDICTION AND VENUE**

1. This Court has Jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1343. This Court has pendent jurisdiction over the state law claims pursuant to 28 U.S.C. §1367.

2. Venue of this legal action is properly within this Court as the acts and omissions of Defendant that gives rise to this Action occurred and are occurring in Marion County, Florida, which is located within the Middle District of Florida. Further, Defendant operates the Marion County Jail ("Jail") located in Marion County, Florida.

**PARTIES**

3. Plaintiff, Roseman, is and at all relative times was, a resident of Marion County, Florida.

4. At all times relevant to this Complaint, Roseman was an inmate at the Jail, which is located in Ocala, Marion County, Florida.

5. Defendant Sheriff is a constitutional officer in the state of Florida with the legal capacity to sue and be sued. The Sheriff is a resident of Marion County, Florida.

6. At all times relevant to this Complaint, the Sheriff acted under color of state law.

#### **GENERAL ALLEGATIONS**

7. Roseman is a pretrial detainee at the Jail.

8. From the time of booking, Roseman has been very clear that he has strong Jewish religious beliefs and adheres to the practices and customs of worship, prayer, Kosher meals, the wearing of a Yarmulke, and other forms of religious expression and practice associated with being a devout Jew.

#### ***The Sincerity of Roseman's Jewish Faith***

9. Roseman has a sincerely held religious belief and considers himself an Orthodox Jew.

10. Growing up as a child, Roseman celebrated and practiced his Jewish faith. Roseman and his family maintained a Jewish lifestyle, including but not limited to, celebrating Shabbat on Fridays and observing Kosher dietary standards.

11. As he grew older, Roseman's faith in the Jewish religion grew even stronger and more concrete, and in 2002, he joined Aleph, a Jewish organization committed to "the Jewish Renewal movement, dedicated to the Jewish people's sacred purpose of partnership with the Divine in the inseparable tasks of healing the world and healing our hearts." See <http://www.aleph.org>.

12. Roseman considers himself an Orthodox Jew, committed to abiding by the tenants of the Jewish faith, including practicing his faith with the proper and appropriate religious texts, following a Kosher diet, and wearing the traditional Yarmulke.

13. When he was booked into the Jail, Roseman informed the Jail employees of his commitment to the Jewish faith and that he was required by his faith to eat Kosher meals.

***Defendant Prohibited Roseman from Wearing a Yarmulke***

14. A Yarmulke is a thin hat that Jewish men traditionally wear at all times, particularly Orthodox Jewish men. The Yarmulke is considered by Jewish men to be a sign of humility and an acknowledgment that God is above them.

15. Although Roseman repeatedly requested a Yarmulke, his requests were repeatedly ignored and denied, and Roseman was not permitted to wear a Yarmulke as required by his faith.

16. Eventually, after numerous requests by Roseman for a Yarmulke, Correction Officers and Lieutenant Schmidt spoke to Roseman and determined that instead of a Yarmulke, Roseman would be provided with an additional towel to be used as an alternative to the Yarmulke. See Composite Exh. 1 (attorney-client privileged portions redacted).

17. A Yarmulke and towel have no resemblance in appearance or form or religious meaning under the Jewish faith. Offering a towel to Roseman was nothing more than a degrading gesture.

18. Eventually, due to the upcoming "High Holidays," Roseman accepted Defendant's offer of wearing a towel on his head instead of a Yarmulke because he felt he had no other option. As a result, in lieu of a Yarmulke, Defendant provided Roseman with a dirty towel to wear on his head.

19. While Roseman wore the dirty towel in place of a Yarmulke because the Sheriff provided him with no other option, the Correctional Officers taunted Roseman, calling him a “towel head.”

20. The Correctional Officers continued to make offensive and degrading remarks toward Roseman regarding the towel. The Correction Officers also told Roseman that the towel on his head was ridiculous and to take it off.

21. Roseman’s practice and expression of his Jewish faith was substantially burdened by the Sheriff’s Yarmulke prohibition.

***Denied Kosher Meals***

22. Although Roseman informed the Jail at booking that he was Jewish and required Kosher meals to comply with the core tenants of his faith, Defendant did not provide Roseman Kosher meals.

23. After booking, Roseman continually informed the Jail employees and Correctional Officers that he was Jewish and required Kosher meals. Roseman made numerous formal and informal requests to Defendant asking for Kosher meals to comply with the core tenants of his Jewish faith.

24. Roseman’s family also contacted the Jail and notified the Jail’s chaplain that the Jail was not providing Roseman with Kosher meals, despite his religious need for same.

25. In response to Roseman’s request for Kosher meals, Defendant eventually instructed that a vegetarian meal be provided to Roseman, as the Jail did not have Kosher meals. However, the meals provided to Roseman were actually considered to be “non-pork” meals, which Roseman later learned actually contained pork.

26. Additionally, Kosher meals require more than that they are merely non-pork or vegetarian. Rather, additional storage and preparation mandates must be satisfied in order for a meal to be considered Kosher.

27. Vegetarian or non-pork meals that contain ingredients or foods that are not stored according to Kosher requirements are not Kosher meals. Likewise, vegetarian or non-pork meals that are not prepared according to Kosher requirements are not Kosher meals.

28. Consuming meals which are simply vegetarian or non-pork (but which fail to comply with the storage and preparation requirements of a Kosher meal) is in violation of a central tenant of the Jewish faith.

29. Passover is a Jewish holiday; during this time, Jews are forbidden from, *inter alia*, consuming leavened food and certain grains. Foods that comply with these stricter dietary standards over and beyond the requirements of Kosher meals are referred to as “Kosher for Passover.”

30. Once he began receiving the so-called “vegetarian” meals, Roseman lost twenty-five pounds in about sixty days due to the Jail’s refusal to provide him with Kosher meals and substitution of vegetarian meals containing far fewer calories than either the traditional or the Kosher meals.

31. Roseman finally began receiving Kosher meals several months after his initial request for Kosher meals; however, the Kosher meals provided to Roseman were often inedible. The Kosher meals ultimately provided to Roseman were often frozen solid or burnt so badly that they could not be consumed, and often, the meals were not Kosher at all. According to the labels on the Kosher meals, the food was often expired by as many as six months. Roseman submitted complaints to

Defendant about these issues and the fact that the Kosher meals being provided were inedible and unacceptably expired.

32. Furthermore, even after he began receiving the often inedible and/or expired Kosher meals, Roseman was still often given completely non-Kosher meals.

33. Correctional Officers employed by Defendant Sheriff also made it exceedingly difficult for Roseman to actually receive the Kosher meals once they were finally made “available.”

34. Officer Waters has refused to obtain Roseman’s Kosher meal and has threatened to disallow Roseman from receiving Kosher meals altogether because of his allegations that other inmates were using the Styrofoam containers that contain the Kosher meals.

35. Officer Chadwick has likewise threatened to discipline Roseman because other inmates are allegedly taking the Styrofoam containers that contain the Kosher meals.

36. In short, Defendant forced Roseman to eat a non-Kosher diet for months until Defendant provided Roseman with “non-pork” meals that contained pork, and therefore, still were not Kosher. Later, when Defendant began providing Roseman with actual “Kosher” meals, those Kosher meals were often not edible, not Kosher, and expired. And, even when he was receiving the often inedible and expired Kosher meals, he was harassed and threatened by Correctional Officers employed by Defendant Sheriff for the mere fact that Roseman’s religion required him to abide by a Kosher diet.

37. Prohibiting Roseman from having Kosher meals for an extended period of time placed a substantial burden on Roseman’s practice of his sincerely held Jewish beliefs.

***Prohibited Religious Texts***

38. Roseman’s faith requires him to review various religious texts.

39. Roseman, to properly practice his faith, requires a Torah, a Talmud and a Shabbat book for Friday prayers.

40. Study of the Torah is integral to the Jewish faith, particularly the study of the Torah in Hebrew.

41. Defendant has prohibited Roseman from having any religious texts other than the Shabbat written in English.

42. Defendant has no rational reason for refusing to provide Roseman with the religious texts necessary for Roseman to practice his faith.

43. Defendant further has no rational reason for prohibiting Roseman from possessing the religious texts necessary for Roseman to practice his faith.

44. Prohibiting Roseman from having required religious texts placed a substantial burden on Roseman from practicing his sincerely held Jewish faith.

***Prohibited from Wearing the Star of David, Although Christian Inmates Wear Crucifixes***

45. Upon information and belief, Defendant has a written policy that allows inmates, at booking, to keep and wear a religious medallion while incarcerated at the Jail.

46. However, Defendant prohibited Roseman from having his Star of David religious medallion. On March 17, 2009, Roseman filled out an Inmate Request Form, asking for his Star of David pendant necklace to be released from his property so that he could use it for prayer and the holidays.

47. Defendant, as a matter of custom, policy and procedure, allows Christian inmates to wear Crucifixes as medallions.

48. Roseman's Star of David Pendant was no larger than the Crucifixes worn by Christian inmates.

49. However, Defendant denied Roseman's request and prohibited Roseman from wearing or possessing his Star of David necklace.

50. Prohibiting Roseman from having his Star of David pendant necklace imposes a substantial burden on Roseman from practicing and expressing his sincerely held Jewish faith.

***Denied Permission to Religious Services Performed by Rabbis***

51. There is no Rabbi serving at the Jail. Further, no religious Jewish services take place at the Jail.

52. Roseman, in order to observe Jewish religious services, inquired into the availability of a Rabbi to perform those Jewish services. Roseman addressed requests to Defendant demanding information regarding when a Rabbi would start at the Jail.

53. Roseman corresponded with local Rabbis who indicated they would be willing to come to the Jail to perform religious services.

54. However, Defendant responded to Roseman's request by telling him no local Rabbis were available to perform religious services and that no Rabbi had ever been available to perform religious services at the Jail. See Exh. 2 (attorney-client privileged portions redacted).

55. Roseman's only opportunity for group worship was under the guidance of a Chaplain conducting Christian services. This type of group worship and guidance from a Chaplain contradicts Roseman's Jewish beliefs.

56. Defendant's failure to provide a Rabbi to Roseman and the failure to provide Roseman the opportunity to engage in Jewish religious services imposes a substantial burden on Roseman's ability to practice his Jewish faith.

***Culture at the Jail***

57. The Sheriff is responsible for managing and operating the Jail. In carrying out his managerial and operational responsibilities for the Jail, the Sheriff employs numerous Correctional Officers. The Sheriff is responsible for the actions and conduct of the Correctional Officers carried out in the course and scope of their employment.

58. It is the custom and practice of the Jail to promote, facilitate and sponsor Christian-based religious beliefs, while ostracizing and condemning those who practice other religions, such as Judaism.

59. By way of example, Defendant provides inmates the opportunity to attend Christian based religious services at the Jail, but Jewish services are not provided.

60. Defendant's policy is to provide pastors and priests so that inmates practicing Christian religions may continue to do so with being inhibited while in Jail. However, Defendant's policy and custom is to not regularly provide, if ever, Rabbis to counsel Jewish inmates such that Jewish inmates are unable to attend religious services appropriate for their faith.

61. Defendant Ed Dean himself personally promotes the use of faith-based counseling to inmates displaying violent tendencies. See Exh. 3 (identifying information redacted). Considering the only faith-based counseling available is based in Christianity, Sheriff Dean himself promotes these religions over others, such as Judaism.

62. The fact that the Jail caters to and accommodates those inmates who practice Christianity is further demonstrated by the fact that Defendant does not have Jewish texts available, did not have any form of Kosher meal available to inmates, and refused to provide Roseman with a Yarmulke.

63. Additionally, the fact that Christian inmates are permitted to wear Crucifixes while Jewish inmates are prohibited from wearing the Star of David is yet further evidence that Defendant promotes a culture that benefits and touts Christianity to the detriment and exclusion of other religions, including Judaism.

64. Roseman addressed his complaints, requests and grievances in writing to various officers, including but not limited to, the Chaplain, Major Laxtan, and Lieutenant Schmidt. Roseman also requested the opportunity to communicate directly with Sheriff Dean.

65. All conditions precedent to this Action have been satisfied and/or waived.

66. Roseman has retained undersigned counsel and has agreed to pay undersigned counsel a reasonable fee for prosecution of these claims.

### **COUNT I**

#### ***Violation of the Religious Land Use and Institutionalized Persons Act***

67. Plaintiff incorporates the allegations contained in Paragraphs 1 through 66 as if fully restated herein.

68. At all times relevant to this Complaint, Defendant Sheriff acted under color of statutes, ordinances, regulations, customs and usages of the State of Florida, the United States Constitution and his office.

69. Roseman is an institutionalized person entitled to the protections afforded by 42 U.S.C. § 2000cc, *et seq.*

70. Roseman has a sincerely held religious belief in the Jewish faith and sincerely considers himself to be an Orthodox Jew.

71. Defendant Sheriff has imposed a substantial burden upon Roseman's exercise of his religious beliefs.

72. Defendant's actions, as set forth above and incorporated herein by reference, significantly inhibited and constrained Roseman's conduct and expression that manifest multiple central tenants of Roseman's individual and sincerely held religious beliefs.

73. Defendant's actions, as set forth above and incorporated herein by reference, meaningfully curtailed Roseman's ability to express adherence to his faith.

74. Defendant's actions, as set forth above and incorporated herein by reference, denied Roseman reasonable opportunities to engage in activities fundamental to Roseman's religion.

75. Defendant has not provided any sufficient means for Roseman to exercise and practice his religious beliefs.

76. The substantial burdens imposed upon Roseman by Defendant Sheriff serve no compelling governmental interest whatsoever.

77. The substantial burdens imposed by the Sheriff forced Roseman to defy the tenants of his faith and violate his sincerely-held religious beliefs.

78. The substantial burdens imposed by the Sheriff violated Roseman's First Amendment rights under the Constitution.

79. Defendant's actions resulted in treatment of Roseman on less equal terms than other non-Jewish inmates.

80. Roseman has suffered damages as a result of Defendant's actions, to wit: prohibiting him from and imposing a substantial burden upon Roseman's exercise, practice, expression and study of his sincerely held religious beliefs. These damages include, but are not limited to, mental and emotional distress.

81. Plaintiff is entitled to reasonable attorneys fees pursuant to 42 U.S.C. § 1988.

WHEREFORE, Plaintiff demands immediate injunctive relief against Defendant, thereby requiring Defendant to provide Plaintiff edible Kosher meals, his Star of David medallion, his Yarmulke, access to a Rabbi and religious services, necessary Jewish religious texts and other reasonable means of practicing and expressing his Jewish faith; monetary damages; attorneys fees' and costs; interest; and for such other further relief deemed just and proper under the circumstances.

## **COUNT II**

### ***Violation of 42 U.S.C. § 1983***

82. Plaintiff incorporates the allegations contained in Paragraphs 1 through 66 as if fully restated herein.

83. At all times relevant to this Complaint, Defendant Sheriff acted under color of statutes, ordinances, regulations, customs and usages of the State of Florida, the United States Constitution and his office.

84. The Plaintiff possesses a constitutional right to Free Exercise of Religion under the First Amendment to the United States Constitution.

85. The Plaintiff possesses a constitutional right to due process under the Fourteenth Amendment to the United States Constitution, which includes the right to exercise his religious faith without substantial burden by Defendant.

86. In violation of Roseman's constitutional rights, Defendant did not afford Roseman sufficient means to practice his religion.

87. Upon information and belief, Defendant's written policies and procedures provide that inmates are able to possess necessary religious texts and religious medallions, and that inmates are entitled access to religious services. However, these policies and procedures are violated on a widespread basis with respect to non-Christian inmates. Inmates, including Roseman, who practice non-Christian religions, such as Judaism, are prohibited from possessing religious texts and religious medallions and are prohibited from having regular access to religious services and a Rabbi; this prohibition is a widespread and persistent practice such that the Sheriff was on actual or constructive notice of the need to correct the deprivation of Plaintiff's constitutional rights.

88. The failure of Defendant to honor the religious freedoms of non-Christian inmates is so permanent and well-settled that it constitutes custom, practice or policy which has the force of law and rises to the level of deliberate indifference to the Plaintiff's constitutional rights under the First and Fourteenth Amendment to the United States Constitution.

89. Defendant Sheriff was on actual or constructive notice of the need to correct the alleged deprivation of Plaintiff's First and Fourteenth Amendment rights, and rather than correcting the deprivation, he deliberately failed (or has been deliberately indifferent in failing) to do so.

90. Defendant Sheriff knew, or should have known, of a need to properly train his officers and deputies to allow Roseman (and other non-Christian inmates) to practice and express his Jewish faith while at the Jail without substantial burden.

91. Defendant Sheriff failed to adequately train and supervise his employees, agents and servants to honor the First and Fourteenth Amendment rights of prisoners (including Roseman), this failure to train was Defendant Sheriff's policy, and this failure to train caused the officers to violate the Plaintiff's First and Fourteenth Amendment rights.

92. The need to provide inmates, such as Roseman, the opportunity to abide by and practice their religious faith without substantial burden, is so open and obvious that Defendant Sheriff knew, or should have known, of a need to properly train his officers and deputies to allow Jewish inmates, such as Roseman, to abide by the tenants of their religion.

93. The history of flagrant and widespread abuse of non-Christian based religious freedoms put Defendant on actual or constructive notice of the need to correct the problem through a proper policy that prevents Defendant and his officers from infringing upon religious freedoms, and Defendant has been deliberately indifferent of the creation and need for a policy.

94. Defendant Sheriff personally participated in the violation of Roseman's constitutional rights by (1) failing to provide Jewish-faith based services; (2) forbidding Roseman from having necessary Jewish texts to practice his faith; (3) failing to provide Kosher meals altogether for several months, and then, once Kosher meals were provided, failing to provide edible Kosher meals; (4) failing to train his Correctional Officers regarding appropriate service and treatment of inmates, including Roseman; (5) by imposing a substantial burden on Roseman's religious practices and expressions through Defendant's own customs, policies and procedures; (6) by promoting a culture

at the Jail that discriminates against and places burdens upon Jewish inmates such as Roseman, and (6) failing to take adequate steps to correct the widespread abuse of existing policies and procedures.

95. The Sheriff's personal involvement with promoting Christian faith-based counseling demonstrates the Sheriff is personally involved in creating a culture that places a substantial burden on any inmate, including Roseman, from practicing the central tenants of their non-Christian based religion.

96. The Sheriff had actual or constructive knowledge of the deprivations of Roseman's First Amendment rights via the correspondence Roseman addressed to Major Laxton, as well as Roseman's requests to communicate with Sheriff Dean directly regarding Defendant's deprivation of Roseman's right to practice his religion.

97. The history of flagrant and widespread abuse of the non-Christian religious freedoms put Defendant on actual or constructive notice of a need to properly train his correctional officers, such that Defendant has been deliberately indifferent of the need to properly train his correctional officers.

98. Defendant's restrictions and prohibitions on Roseman's constitutional rights are irrational, unreasonable, and impose unjustifiable restrictions on the practice of his religion.

99. Roseman has suffered damages as a result of Defendant's actions.

100. The Plaintiff is entitled to reasonable attorney fees pursuant to 42 U.S.C. § 1988.

WHEREFORE, Plaintiff demands immediate injunctive relief against Defendant, thereby requiring Defendant to provide Plaintiff edible Kosher meals, his Star of David medallion, his Yarmulke, access to a Rabbi and religious services, necessary Jewish religious texts and other

reasonable means of practicing and expressing his Jewish faith; monetary damages; attorneys fees' and costs; interest; and for such other further relief deemed just and proper under the circumstances.

**COUNT III**

***Violation of Florida's Religious Freedom Restoration Act of 1998***

101. Plaintiff incorporates the allegations contained in Paragraphs 1 through 66 as if fully restated herein.

102. In violation of Florida Statute Section 761.03, Defendant Sheriff has substantially burdened Roseman's exercise of religion.

103. The many ways in which Defendant has substantially burdened Roseman's exercise of religion are set forth extensively above and incorporated herein.

104. Defendant Sheriff's imposition of substantial burdens upon Roseman's exercise of religion furthers no compelling governmental interest.

105. Defendant Sheriff's conduct forced Roseman to engage in conduct that Roseman's religion forbids, as more fully alleged herein.

106. The Plaintiff herein is entitled to recover attorneys fees pursuant to Florida Statute Section 761.04.

WHEREFORE, Plaintiff demands immediate injunctive relief against Defendant, thereby requiring Defendant to provide Plaintiff edible Kosher meals, his Star of David medallion, his Yarmulke, access to a Rabbi and religious services, necessary Jewish religious texts and other reasonable means of practicing and expressing his Jewish faith; monetary damages; attorneys fees' and costs; interest; and for such other further relief deemed just and proper under the circumstances.

**JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable.

Dated February 26, 2010.

FORIZS & DOGALI, P.A.



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Attorneys for Plaintiff



SHERIFF'S OFFICE  
Marion County  
Inmate Request Form

TO:

Bureau Chief  
Division Commander  
Watch Commander  
Zone Sergeant  
Pod Officer  
Programs

Chaplain  
Records  
Commissary  
Classifications  
Public Defender  
Other: \_\_\_\_\_

FROM (PLEASE PRINT):

Joshua D. Roseman  
(Inmate Name)

A0103392  
(Pin Number)

3-15-09  
(Date)

DA 205 B  
(Pod/Section/Cell #)

M. McE...  
(Received from Inmate by Officer Signature and ID #)

030509  
(Date/Time)

REQUEST/COMPLAINT:

*I desperately need to speak with you right away please since I am not being allowed my yomutke as required by my faith you had offered extra towels for me to use in prayer. I need to accept this offer for my high holidays are in the next couple of months*

RESPONSE: *Starting March 8th. please come ASAP.*

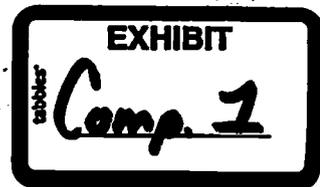
*Thank you*

*Duplicate = Lt. Schmidt*

[Signature]  
(Response to inmate by Officer Signature and ID #)

3/15/09 10:24  
(Date/Time)

White Copy - Classification once the response is compiled.  
Yellow Copy - Inmate once the response is compiled.  
Pink Copy - Inmate after the officer signs the form.



On 031209, Lt. Schmidt spoke with ~~Inmate Roseman reference his religious concerns~~

Below is a over view of the conversation.

Inmate Joshua Roseman, Requested to receive kosher meals and be involved in Jewish services, and abide by the Sabbath rules, to include, Yarmulkes (A covering for the head during prayer).

[REDACTED] Inmate Roseman provided enough information to be placed on an Inmate Kosher meal. I have sent an email to Lt. Byrd and Sgt. Yawn reference the request.

[REDACTED] I have requested the Chaplains contact Rabbi Katz, and request if a local Rabbi can be made available to assist with Jewish services.

[REDACTED] • Inmate Roseman will be issued an additional inmate towel, to be used as his Yarmulkes. Documentation will be placed into the inmates file reference this request. The inmate will receive a copy of the documentation to keep on his person.





**SHERIFF'S OFFICE**  
Marion County  
Inmate Request Form

TO:

Bureau Chief  
Division Commander  
Watch Commander  
Zone Sergeant  
Pod Officer  
Programs

Chaplain  
Records  
Commissary  
Classifications  
Public Defender  
Other: \_\_\_\_\_

FROM (PLEASE PRINT):

Joshua D. Roseman  
(Inmate Name)

A0103392  
(Pin Number)

3-17-09  
(Date)

DA 205B  
(Pod/Section/Cell #)

[Signature] 8500  
(Received from inmate by Officer Signature and ID #)

3/17/09 2200  
(Date/Time)

REQUEST/COMPLAINT:

H. Schmidt has informed me that shabbat / religious services for Jewish inmates are being arranged with the assistant chaplain. I would like to know an approximate start date and what rabbi and with what temple so I may correspond with him. Please only ALL information is most appreciated.

RESPONSE:

Thank you and God Bless

There are no Rabbis in the community who will do this at this time. There have not been any in the past either.



[Signature]  
(Response to inmate by Officer Signature and ID #)

3/24/09 10:01  
(Date/Time)

White Copy - Classification once the response is compiled.  
Yellow Copy - Inmate once the response is compiled.  
Pink Copy - Inmate after the officer signs the form.



~~MANAGEMENT PROBLEM INMATE ROOM~~

|  |               |  |
|--|---------------|--|
| FOLLOW-UP  | DATE: 9/26/08 | WATCH COMMANDER: Capt. R. Burnett #938 |
| Sheriff Dean recommended that Inmate [REDACTED] receive faith based counseling. Faith based counseling has been conducted by Pastor/Chaplain Franklin on a weekly basis. |               |  |

