

Office of General Counsel
Walter J. Harvey, General Counsel

SUBJECT: PROVISION OF LEGAL REPRESENTATION FOR THE FOLLOWING MATTERS: Quenia Caignet v. Reinaldo Montano, County Court Case No. 2023-11846-SP-05; and

Barbara Etienne (Mother) and on behalf of T.B. (a minor child) v. Miami-Dade County School Board, and Margarita Crown M.D.S.P.D., Circuit Court Case No. 2023-016366-CA-01

On May 11, 2023, a Statement of Claim in the case of *Quenia Caignet v. Reinaldo Montano* was served on Mr. Montano. The Statement of Claim seeks the dismissal of a complaint received by the Civilian Investigative Unit (CIU) apparently through the process afforded by the Personnel Investigative Model (PIM). The basis of the asserted claim arises from a CIU investigation that was initiated through the PIM process. On July 3, 2023, the lawsuit of *Barbara Etienne (Mother) and on behalf of T.B. (a minor child) v. Miami-Dade County School Board, a political entity or subdivision of the State of Florida, and Margarita Crown M.D.S.P.D.* was served on the School Board. The Complaint includes claims of false arrest, malicious prosecution, negligent supervision, and premises liability, which are based on, among other things, the arrest of the Plaintiff on school grounds.

In accordance with the District's established practice, the current and former employees individually named as Defendants in these lawsuits have formally requested that the School Board provide them with legal representation. Pursuant to School Board Policy 6900, *Legal Services for Employees of the Board*, and § 1012.26, Fla. Stat. (2022), the Office of the General Counsel (OGC) requests that the School Board authorize the provision of legal representation for these current and former employees. In the interim, the OGC will be filing the necessary documents with the Court to protect the employees' and the School Board's legal interests.

RECOMMENDED: That the School Board of Miami-Dade County, Florida, authorize the Office of the General Counsel to provide or secure legal representation for the legal defense of the current School Board employees who are individually named as defendants in the cases of Quenia Caignet v. Reinaldo Montano, Case No. 2023-11846-SP-05; and Barbara Etienne (Mother) and on behalf of T.B. (a minor child) v. Miami-Dade County School Board, a political entity or subdivision of the State of Florida, and Margarita Crown M.D.S.P.D., Circuit Court Case No. 2023-016366-CA-01.