

# RAWSI WILLIAMS LAW GROUP

701 Brickell Avenue  
STE 1550  
Miami FL 33131

Principal: Raws Williams, Esq., R.N.  
Attorney | Registered Nurse | Veteran  
[Web: CallRawsWilliams.com](http://Web: CallRawsWilliams.com)

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888-**RAWSI**LAW (888-729-7452)

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December 22, 2021

(NOTICE CONTAINS CONFIDENTIAL PERSONAL INFORMATION)

School Board of Miami-Dade County A/K/A Miami-Dade County Public Schools  
ATTN. Mr. Alberto M. Carvalho in his official capacity as Superintendent of the  
School Board of Miami-Dade County, or in his absence, an appointed designee  
Miami-Dade County Public Schools  
1450 N.E. Second Avenue  
Suite 912  
Miami, Florida 33132

School Board of Miami-Dade County A/K/A Miami-Dade County Public Schools  
ATTN. Ms. Perla Tabares Hantman in her official capacity as Chair, School Board of  
Miami-Dade County, or in her absence, an appointed designee  
Miami-Dade County Public Schools  
1450 N.E. Second Avenue  
Suite 912  
Miami, Florida 33132

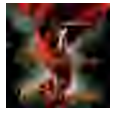
School Board of Miami-Dade County A/K/A Miami-Dade County Public Schools  
ATTN. Dr. Steve Gallon, III, in his official capacity as Vice Chair, School Board of  
Miami-Dade County, or in his absence, an appointed designee  
Miami-Dade County Public Schools  
1450 N.E. Second Avenue  
Suite 912  
Miami, Florida 33132

and Florida Department of Financial Services  
Office of Legal Counsel  
200 E. Gaines St  
Tallahassee, FL 32399

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VIA PROCESS SERVER

RE: student Amaria Clark: Notice pursuant to Section 768.28, Florida Statutes  
(Miami-Dade Police Case # PD2109293093581)



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Dear Madam/Sirs:

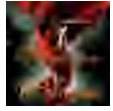
Please be advised pursuant to the requirements of section 768.28, Florida Statutes, that tort claims are being made against the School Board of Miami-Dade County. These claims arise out of *inter alia*, 14<sup>th</sup> Amendment Due Process and Equal Protection Claims (via 42 U.S.C. 1983 as the enabling statute), violation of the American With Disabilities Act, the assault, battery, false imprisonment, negligence, and infliction of emotional and physical distress occurring on September 29, 2021, at *Airbase Elementary School* (“*Airbase*”) wherein a teacher, [REDACTED], without notice, warning, or provocation, retaliated against minor/student Amaria Clark for reporting bullying by this teacher, by abruptly grabbing seven-year old Amaria from behind by the left arm while Amaria was facing forward in the active process of boarding the school bus to ride home. Amaria was physically in the process of stepping upward on the steps of the school bus when this teacher committed these acts, resulting not only in severe mental distress to Amaria but physical injury to her left wrist causing Amaria to be taken to *Nicklaus Children’s Hospital* for treatment. Mrs. Clark has also presented these issues to both the Principal Mr. Alonzo Pendergrass and Assistant Principal Ms. Angella Gibson-Carvalho. In case [REDACTED] has not reported it, she is under investigation by the police and DCF for her actions in this matter.

See Miami-Dade Police Report (**Case # PD2109293093581 EXHIBIT A.**)  
See Miami-Dade Schools Police Incident Report. **EXHIBIT B.**

Immediately preceding this incident on September 29, 2021, namely on September 15, 2021, parent Mrs. Adah Clark sent an email to Assistant Principal Ms. Carvalho requesting that minor Amaria be immediately removed from teacher [REDACTED] due to [REDACTED] ongoing misconduct, negligence, and bullying toward Amaria, including but not limited to refusing to let seven-year old Amaria go to the bathroom as requested and disciplining Amaria for being “impulsive” or not exactly following [REDACTED] instructions the first time. [REDACTED] actions included informing Mrs. Clark that Amaria doesn’t really have to use the bathroom when requesting to do so. Of note, Amaria is under the care of a Urologist for the past four years at *Miami Children’s Hospital*. In fact, Amaria came from the medical foster system before being adopted by Mr. and Mrs. Clark. Amaria was previously on an Individualized Education Plan (“IEP”), determined eligible for Exceptional Student Education (“ESE”) because she is developmentally delayed. In that IEP, it is specifically stated that direct specialized instruction and assistance for the majority of learning activities are required for Amaria, as well as assistance with self-regulatory behavior, hand-eye coordination, and communication skills. Accordingly, *Airbase* and [REDACTED] knew or should have known the learning issues and physical limitations concerning Amaria. Further, this was not the first time that Mrs. Clark had complained regarding [REDACTED] maltreatment of Amaria.

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It’s My **PURPOSE** to Fight for Your Justice.  
[www.CallRawsWilliams.com](http://www.CallRawsWilliams.com)



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Then on September 29, 2021 -- the date of this incident, Amaria was boarding the bus to ride home per her usual routine. Additionally, per their usual routine Amaria's mother Mrs. Adah Clark meets Amaria at the bus stop to take her home. At that time Amaria was no longer a student in [REDACTED] class, and had no contact with [REDACTED] on that day prior to this incident. Yet, [REDACTED] came up behind Amaria while Amaria was physically in the process of stepping up to the second step of the bus while actively boarding the bus, grabbed Amaria from behind by the left arm without warning or provocation, pulled Amaria off the bus, spun Amara around to face her, and then accused Amaria of stealing a cellphone. Amaria's older sibling was already on the bus and witnessed this incident as did other students. [REDACTED] actions caused immediate injury and swelling of little Amaria's arm. Amaria is patently afraid of [REDACTED].

When parent Mrs. Clark met Amaria at the bus stop to take her home, Amaria was visibly guarding her left arm when exiting the bus, and the arm was swollen. In addition to Amaria, children who witnessed [REDACTED] actions recounted her actions to Mrs. Clark. Mrs. Clark immediately took Amaria to her Pediatrician, who referred her to urgent care at *Nicklaus Children's Health System*. A police report was also obtained by the Miami-Dade Police during that visit.

Amaria has suffered and continues to suffer tremendous economic and non-economic damages from the actions of [REDACTED] and *Airbase*. Further, seeing that this incident occurred after parent Mrs. Clark had already complained to *Airbase* about [REDACTED] misconduct and request for removal of Amaria from [REDACTED] class, it is clear that Miami-Dade Public Schools wholly failed its duty to stop this conduct from its employees against students.

Further, due to the horrendous actions of [REDACTED] we advise that she is not to have any contact with Amaria Clark, directly or indirectly. Failure to comply will result in us filing for protective order against her and seeking further damages.

The statutory required information for Amaria is as follows:

**NAME:** Amaria Clark

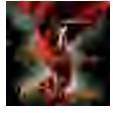
**DOB:** [REDACTED]

**COUNTY OF BIRTH:** [REDACTED]

**SSN:** [REDACTED]

**Date of Incident:** September 29, 2021

**Claimant:** Mr. William and Mrs. Adah Clark (parents), on behalf of their minor daughter Amaria Clark.



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There are no prior adjudicated penalties, fines, fees, victim restitution fund, or other judgments owed by Amaria Clark to the State or its agencies or subdivisions.

Contact with my office regarding this matter can be made via telephone (888-RawsLaw/888-729-7452) or email ([rawsi@rawsi.com](mailto:rawsi@rawsi.com).) Assault, injury, and traumatization of students, among other actions, in Miami-Dade Public Schools must stop.

Sincerely,

Raws Williams, Esq., R.N.  
Counsel for Amaria Clark and the Clark Family

**/s/ Frank T. Allen**

Frank T. Allen, Esq.  
Co-Counsel for Amaria Clark and the Clark Family  
The Allen Firm, P.A.  
2582 Maguire Rd.,  
Suite 130  
Ocoee, FL 34761  
(407) 407-481-8103(Tel)  
(407) 407-481-0009(Fax)  
[www.TheAllenFirmPA.com](http://www.TheAllenFirmPA.com)  
email: [Fallen@TheAllenFirmPA.com](mailto:Fallen@TheAllenFirmPA.com)

encl: Exhibits A and B

**EXHIBIT A**  
**Miami-Dade**  
**Police Report**



Agency Of Occurrence

Date Written

030

09/29/2021

OFFENSE-INCIDENT REPORT  
MIAMI-DADE POLICE DEPARTMENT

Agency Report Number

PD210929309358

## REPORT SUMMARY (ORIGINAL)

☐ L.E. Exempt ☐ D.V. ☐ Gang Related ☒ Juv. in Report ☐ Juv. Warn/Dismiss ☐ Marsy's Law ☐ Tourist

Victims: 1 Offenders: 1 Stolen Vehicles: 0 Offenses: 1 Properties: 0 SARS: NO Drive By: NO

## INCIDENT (12829 SW 272ND ST)

Original Reported Date WED, 09/29/2021 17:30	Title or Classification ASSIST OTHER AGENCY	Time Dispatched 09/29/2021 18:08	Time Arrived 09/29/2021 18:51	Time Completed 09/29/2021 19:30
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Incident From WED, 09/29/2021 14:00	Incident To WED, 09/29/2021 14:45	District SOUTH
Incident Location 12829 SW 272ND ST	City MIAMI	Zip 33032
Business Name/Area Identifier AIRBASE K-8	Forced Entry N/A	Occupancy N/A
		Cargo Theft N/A

## OFFENSES

## 827.03(2)(C) CHILD ABUSE/NO HARM

Description CHILD ABUSE/NO GREAT BODILY HARM	Statute 827.03(2)(C)	Subsection 2C	Ordinance	<input type="checkbox"/> D.V.
Type FELONY	Action COMMITTED	FDLE/FIBRS 13A	Location Type SCHOOL/UNIVERSITY	Method of Entry N/A
Suspected of Using NOT APPLICABLE	Criminal Activity NONE/UNKNOWN	Bias/Motivation NONE (NO BIAS)	# Prem. Entered 0	

## Weapons

Weapon Type	Status	Serial	Description
OTHER			

 Remark  
HANDS

## VICTIM/WITNESS

## 2 - VICTIM-CLARK, AMARIA

1	V/W Code VICTIM	Offenses Indicator 827.03(2)(C)
Name (Last, First, Middle or Business) CLARK, AMARIA	Synopsis of Involvement/Activity AT SCHOOL	Victim Type JUVENILE <input type="checkbox"/> Tourist
Address [REDACTED]	City, State Zip Country MIAMI, FLORIDA 33032 US	
Race BLACK OR AFRICAN A	Sex FEMALE	Date of Birth [REDACTED]
Residence Type COUNTY	Residence Status FULL YEAR	Age 7
		Juvenile <input checked="" type="checkbox"/> Hispanic <input type="checkbox"/> Ethnicity AFRICAN AMERICAN
		Extent of Injury MINOR
		Will victim prefer charges? YES
Web Site	Email Address	

## Relationship(s)

Suspect Type	Suspect Name	Victim or Witness Relationship to the Suspect
SUSPECT	[REDACTED]	STUDENT

## Injury Types

☒ ABRASIONS/BRUISES



030

09/29/2021

PD210929309358

## VICTIM/WITNESS

## 1 - REPORTING PERSON-CLARK, ADAH

<b>2</b>	V/W Code REPORTING PERSON	Offenses Indicator 827.03(2)(C)	
Name (Last, First, Middle or Business) CLARK, ADAH		Synopsis of Involvement/Activity OTHER ACTIVITY	
Address [REDACTED]		City, State Zip Country MIAMI, FLORIDA 33032 US	
Race BLACK OR AFRICAN A	Sex FEMALE	Date of Birth UNKNOWN	Age UNKNOWN
Residence Type COUNTY		Residence Status FULL YEAR	Extent of Injury
Web Site		Email Address	

## Phone Numbers

Type CELL	Phone Number [REDACTED]	Extension	Best time to call
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## 3 - OTHER-

<b>3</b>	V/W Code OTHER	Offenses Indicator 827.03(2)(C)	
Name (Last, First, Middle or Business) [REDACTED]		Synopsis of Involvement/Activity AT SCHOOL	
Address [REDACTED]		City, State Zip Country MIAMI, FLORIDA 33032 US	
Race BLACK OR AFRICAN A	Sex MALE	Date of Birth [REDACTED]	Age 9
Residence Type COUNTY		Residence Status FULL YEAR	Extent of Injury
Web Site		Email Address	

## SUSPECTS OR MISSING PERSONS

☐ Added ☐ Changed

## 1 -

<b>1</b>	Person Code SUSPECT	Offenses Indicator 827.03(2)(C)	
Name (Last, First, Middle) [REDACTED]		Maiden Name	Nickname/Alias
Race WHITE		Sex FEMALE	Date of Birth Age Range <input type="checkbox"/> 50 TO 60 YR
Residence Type		Last Known Address UNK	City, State Zip Country
Occupation/Grade		Employer/School	
Driver License		DL State	Social Security Number
Height 66" or 5'6"		Weight 220 lbs	Clothing UNK
Transportation Mode UNKNOWN		Special Identifiers	
Eye Color UNKNOWN		Hair Color BLOND OR STRAWB	Hair Length LONG
Build HEAVY		Facial Hair NONE	Teeth NORMAL





030

09/29/2021

PD210929309358

## OFFICERS

## Unit: C3204

1	Agency Code 030	Badge 9830	Title POLICE OFFICER	Name RODRIGUEZ, E.	Loc Code 43	Role REPORTING OFFICER
2	Agency Code 030	Badge 9627	Title POLICE OFFICER	Name ARCE, J.	Loc Code 07043	Role ASSISTING OFFICER
Supporting Officer(s)						
3	Agency Code 030	Badge 5435	Title POLICE SERGEANT	Name SERRANO, D. G.	Loc Code 07043	Role REVIEWING SUPERVISOR
4	Agency Code 030	Badge 5147	Title POLICE OFFICER	Name LANDA REYES, J. A.	Loc Code 07044	Role ASSIGNED DETECTIVE

## ADMINISTRATION

Clearance Type CLEAR BY EXCEPTION	Clearance Date 12/16/2021 00:00	Exception Type	Juvenile/Adult JUVENILE
Case Status CLOSED	Assignment Type ASSIGNED INFO	Referred By	Additional Forms
Reporting Agency MIAMI-DADE	AOA Agency	Other AOA	AOA Related Case
Original Case Number			

## NARRATIVES

Written By: mdpd\U309830

NARRATIVE

Date and Time: 9/29/2021 6:45:53 PM

THIS UNIT WAS DISPATCHED TO NICKLAUS CHILDREN'S URGENT CARE LOCATED AT 2072 NE 8TH ST IN REFERENCE A BATTERY THAT OCCURRED AT AIRBASE K-8 PUBLIC SCHOOL.

UPON ARRIVAL, CONTACT WAS MADE WITH REPORTING PERSON (CLARK, ADAH) WHO ADVISED THAT HER DAUGHTER VICTIM (CLARK, AMARIA) WAS GRABBED BY A TEACHER SUSPECT [REDACTED] WHILE GETTING ON THE SCHOOL BUS THIS AFTERNOON AND PULLED OFF THE BUS FROM THE SECOND STEP BY BOTH HANDS.

WITNESS ([REDACTED]) IS VICTIM (CLARK, AMARIA)'S [REDACTED] AND HE SAW WHEN TEACHER [REDACTED] GRABBED VICTIM (CLARK, AMARIA) BY THE WRIST AND PULLED HER OFF OF THE BUS LEAVING VISIBLE RED MARKS AND COMPLAINED OF PAIN.

REPORTING PERSON (CLARK, ADAH) TOOK HER DAUGHTER VICTIM (CLARK, AMARIA) TO NICKLAUS CHILDREN'S URGENT CARE LOCATED AT 2072 NE 8TH ST FOR MEDICAL EVALUATION.

VICTIM (CLARK, AMARIA) HAD VISIBLE RED MARKS ON BOTH HANDS/ WRIST AREA.

VICTIM PICTURES ATTACHED

SCHOOL BOARD SGT. L WEBB WAS CONTACTED AND WILL HAVE ONE OF HER UNITS CONDUCT A CRIMINAL AND ADMINISTRATIVE INVESTIGATION.

SCHOOL BOARD PD CASE# 21-1013325949

CASE CARD ISSUED

BWC UTILIZED

## ATTACHMENTS (IMAGE)

IMAGE 1 OF 3

IMAGE 2 OF 3





VIC 2



VIC 1

IMAGE 3 OF 3



VIC 3



**EXHIBIT B:**  
**Miami-Dade**  
**Schools Police**  
**Report**



I N C I D E N T  D A T A	Agency Name <b>Miami - Dade Schools Police</b>		<b>INCIDENT/INVESTIGATION REPORT</b>								SPAR Case# <b>C01514</b>	
	ORI <b>FL 0133700</b>		<b>** Contains Restricted Names **</b>								Case# <b>21-1013325949</b>	
	Location of Incident <b>12829 SW 272ND ST, Unincorporated Miami FL</b>		Gang Relat <b>NO</b>	Premise Type <b>School/university/coll</b>	District/Law		Date / Time Reported <b>10/13/2021 11:44 Wed</b>					
						Last Known Secure <b>09/29/2021 14:00 Wed</b>						
						At Found <b>10/08/2021 11:00 Fri</b>						
						Activity						
M O	#1	Crime Incident(s) <b>Information</b> <b>777.7771</b>	(Com)	Weapon / Tools <b>NONE</b>			Entry			Exit	Security	Activity
	#2	Crime Incident	( )	Weapon / Tools			Entry			Exit	Security	Activity
	#3	Crime Incident	( )	Weapon / Tools			Entry			Exit	Security	Activity
V I C T I M	# of Victims <b>0</b>		Type:	Injury:			Domestic: N					
	V1	Victim/Business Name (Last, First, Middle)			Victim of Crime #	DOB	Race	Sex	Relationship To Offender	Resident Status	Military Branch/Status	
	Home Address			Age								
	Employer Name/Address							Business Phone		Mobile Phone		
	VYR	Make	Model	Style	Color	Lic/Lis	VIN					
	CODES: V- Victim (Denote V2, V3) O = Owner (if other than victim) R = Reporting Person (if other than victim)											
O T H E R S	Type: INDIVIDUAL (NOT A LE OFFICER) Injury:											
	Code RP	Name (Last, First, Middle) <b>CLARK, WILLIAM</b> <b>Restricted</b>			Victim of Crime #	DOB	Race	Sex	Relationship To Offender	Resident Status	Military Branch/Status	
	Home Address			Age								
	Employer Name/Address							Business Phone		Mobile Phone		
I N V O L V E D	Type: INDIVIDUAL (NOT A LE OFFICER) Injury:											
	Code IO	Name (Last, First, Middle) <b>CLARK, AMARIA</b>			Victim of Crime #	DOB <b>07/26/2014</b>	Race <b>B</b>	Sex <b>F</b>	Relationship To Offender	Resident Status	Military Branch/Status	
	Home Address			Age <b>07</b>								
	Employer Name/Address							Business Phone		Mobile Phone		
P R O P E R T Y	L = Lost S = Stolen R = Recovered D = Damaged Z = Seized B = Burned C = Counterfeit / Forged F = Found ("OJ" = Recovered for Other Jurisdiction)											
	VI #	Code	Status Frm/Tc	Value	OJ	QTY	Property Description			Make/Model		Serial Number
S T A T U S	Officer/ID# <b>Salgado, Eli (SRO, SO) (333829)</b>											
	Invest ID# <b>(0)</b>		Supervisor <b>Rolle, Alexander E (OP, CO) (221353)</b>									
	Complainant Signature		Case Status <b>Report Written 10/13/2021</b>			Case Disposition: <b>Report Written 10/15/2021</b>			Page 1			
R CS1IBR Printed By: LPEREZ, LPEREZ Sys#: 158285 10/25/2021 14:59												



# Incident Report Additional Name List

Miami - Dade Schools Police

OCA: 21-1013325949

## Additional Name List

\*\* Contains Restricted Names \*\*

Name Code/#	Name (Last, First, Middle)	Victim of Crime #	DOB	Age	Race	Sex
1 ) RP 2	CLARK, ADAH				B	F
	Address [REDACTED]		H: [REDACTED]			
	Empl/Addr		B: - -			
			Mobile #: - -			
2 ) IO 2	[REDACTED]			64	H	F
	Address [REDACTED]		H: - -			
	Empl/Addr		B: - -			
			Mobile #: - -			
3 ) IO 3	PENDERGRASS, ALONZA III			45	B	M
	Address [REDACTED]		H: [REDACTED]			
	Empl/Addr Air Base K-8, 12829 Sw 272nd St		B: 305-258-3676			
			Mobile #: - -			

Accessed By: LPEREZ

(9913-DT-146415 # 246415)

## INCIDENT/INVESTIGATION REPORT

Miami - Dade Schools Police

Case # 21-1013325949

Status Codes	UCR	Status	Quantity	Type Measure	Suspected Type	Up to 3 types of activity
D						
G						
S						

Assisting Officers

Suspect Hate / Bias Motivated: None (No bias)

## INCIDENT/INVESTIGATION REPORT

Narr. (cont.) OCA: 21-1013325949

Miami - Dade Schools Police

## NARRATIVE

On Wednesday, October 13, 2021, at approximately 11:30 AM while on-campus patrol at Air Base K-8 (12829 SW 272nd St) I was approached by the parents of (IO-1). Mr. and Mrs. Clark informed me of an incident that took place in the school bus area involving their daughter and a teacher.

The parents informed me that on the afternoon of September 29, 2021, their daughter (IO-1) arrived home from school and complained of discomfort in her left wrist. (RP-2) stated that when she inspected IO1's left wrist, she noticed redness and swelling. When questioned on how (IO-1) received the injury to her wrist, (RP-2) stated that this occurred as her daughter was attempting to board the school bus (Bus # 3422). Allegedly, [REDACTED] (Teacher/IO-2) grab her by the arm and removed her from the bus.

(RP-2) advised that she transported (IO-1) to the urgent care (Nicklaus Children's Homestead Outpatient Center 2072 NE 8th ST) for treatment that same afternoon.

(RP-2) in addition, informed that she contacted the Miami-Dade Police Department the day of the incident to report this incident under case# PD2110929309308.

On Sunday, October 3, 2021, the incident was also reported to DCF by (RP-2). Case manager [REDACTED] will be reviewing the case.

I informed School Principal Mr. A. Pendergrass (IO-3) of the incident that was reported.

(IO-3) mention that he is currently aware of the incident and the incident has been documented.

(IO-3) stated that he initiated a (PIM) Personnel Investigation Model on the allegations. Based on the information from the district the report is currently under administrative review. GIU Sgt. Webb was notified and confirmed that the investigation is being currently reviewed. Mr. and Mrs. Clark requested for a report to document the allegations.

AR # C-85071

Case card issued