

IN THE CIRCUIT COURT OF THE  
17TH JUDICIAL CIRCUIT IN AND FOR  
BROWARD COUNTY, FLORIDA

CALVIN REID and MAMIE REID,  
co-Personal Representatives of the  
ESTATE OF CALVON ANDRE REID,

CASE NO.: CACE-15-014262

Plaintiffs,

vs.

CITY OF COCONUT CREEK,  
SGT. DAVID FREEMAN,  
SGT. DARREN KARP,  
OFC. THOMAS EISENRING, and  
OFC. DANIEL RUSH,

Defendants.

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**AMENDED COMPLAINT AND JURY TRIAL DEMAND**

Plaintiffs, Calvin Reid and Mamie Reid, co-Personal Representatives of the Estate of Calvon Andre Reid (known as "Andre Reid"), sue Defendants, City of Coconut Creek (the "City"), Sgt. David Freeman ("Sgt. Freeman"), Sgt. Darren Karp ("Sgt. Karp"), Ofc. Thomas Eisenring (Ofc. Eisenring"), and Ofc. Daniel Rush ("Ofc. Rush"), and state:

**Introduction**

1. This case involves the tragic killing of an unarmed African American man by law enforcement officers. The weapons used were Tasers. Officers of the Coconut Creek Police Department held, beat, and repeatedly tased 39-year-old Andre Reid, causing his death, which has been declared a homicide. Three officers involved in this homicide -- consistent with the widespread practice of the Coconut Creek Police Department -- violated state law that mandated regular training in the use of a Taser. They then used their Tasers in clear violation of the proper procedures. Had these law enforcement officers been required by the Coconut Creek Police

Department to obtain and observe the legally-mandated training, and had they respected the constitutional rights of a man peacefully asking for help, then Andre Reid, a beloved son and the father of two boys, would be alive today.

### **Preliminary Matters**

2. This is a cause of action for damages in excess of Fifteen Thousand Dollars (\$15,000.00), exclusive of costs, interest, and attorney's fees.

3. Calvin Reid and Mamie Reid are the parents of Andre Reid and have been appointed co-Personal Representatives of his Estate through an order entered by the Broward County Circuit Court.

4. At the time of his death, Andre Reid resided in Broward County, Florida.

5. The City is a political subdivision of the State of Florida located within Broward County. The Coconut Creek Police Department is a department of the City.

6. At all material times, Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush were employed as police officers with the Coconut Creek Police Department, acting within the course and scope of their employment. Each resided in Broward County.

7. The acts at issue were committed, the death of Andre Reid occurred, and the causes of action arose in Broward County.

8. All conditions precedent to suit have occurred, been performed, been waived, or been excused, specifically including full compliance with the presuit notice requirements of Florida Statute 768.28.

9. Plaintiffs have retained the undersigned attorneys to prosecute this action on their behalf and have agreed to pay them a reasonable fee and to reimburse the costs of this action.



## Background Allegations

### *Coconut Creek Police Department: A Widespread Disregard for State Law*

10. As of February 22, 2015, Police Chief Michael Mann was the policymaker for the Coconut Creek Police Department on matters of law enforcement, including compliance with all Florida Statutes that regulate or govern police conduct.

11. Section 943.1717(5) of the Florida Statutes mandates annual Taser training:

(5) After completing the basic skills course, each law enforcement, correctional, and correctional probation officer who is authorized by his or her agency to use a dart-firing stun gun ***must complete an annual training course on the use of dart-firing stun guns***. The annual training course on the use of dart-firing stun guns must be a minimum of 1 hour duration.

(Emphasis added).

12. As of February 22, 2015, the Coconut Creek Police Department employed nearly 100 sworn law enforcement officers. Over 80 of them, including then-Police Chief Mann, were not current on their Taser certifications, having failed to comply with section 943.1717(5).

13. Specifically, Sgt. Freeman had received just one Taser certification, on August 8, 2006. He had been in violation of section 943.1717(5) for more than seven years on the night that Andre Reid was killed. Sgt. Karp had last received a Taser certification on March 1, 2006, so he, too, had been in violation of state law for more than seven years. Ofc. Rush was certified on May 8, 2013, so he had been in violation of section 943.1717(5) for nearly a year. Ofc. Eisenring was certified on March 27, 2014, so his certification was due to expire the month after Andre Reid was killed.

14. After Andre Reid was killed through police misuse of Tasers (as described below), the Coconut Creek Police Department, at the direction of Chief Mann, attempted to re-

certify its officers after the fact and then mislead the press and public concerning their certification status at the time of the killing.

15. These actions of the Coconut Creek Police Department reflect both an awareness that they had violated the mandate of state law and a willingness, at the highest level, to conceal their violations.

16. The officers' failure to comply with statutorily-mandated Taser training was known, was condoned by, and reflected an unwritten policy, custom, or practice of, the Coconut Creek Police Department.

17. Moreover, the fact that four officers, including two veteran supervisors, acted in concert, with no one voicing any dissent as Andre Reid was killed, reflects a police department run amok.

*The Death of Andre Reid: Homicide by Taser*

18. In the early morning of February 22, 2015, Andre Reid approached Perry Weiss in the parking lot of the Wynmoor Village retirement community, a predominantly white neighborhood. Andre Reid did not look or act injured, but his shirt and pants were partially torn. Andre Reid was calm, polite, and non-aggressive. He did not seem upset or agitated. Andre Reid asked if Mr. Weiss could take him to the hospital. When Mr. Weiss said that he could not, Andre Reid asked whether he would call 911. Mr. Weiss agreed and called 911.

19. Paramedics responded to Wyndmoor Village. Subsequently, so did four Coconut Creek Police Officers: Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush.

20. At no time was Andre Reid threatening, aggressive, or disrespectful toward the police. Nonetheless, police acted on the baseless assumption that a black man in a white



neighborhood late at night must be doing something illegal. The officers detained Andre Reid, held him against his will, threatened him, beat him, tased him, and drove him to the ground.

21. The violent overreaction was based on the color of Andre Reid's skin. Simply put, this would not have happened if Andre Reid had been a white man.

22. The commotion attracted the attention of Wyndmoor Village residents, who looked outside and saw police officers holding Andre Reid face down in the grass, with a knee in his back and zip ties binding his wrists together. One of the officers kicked Andre Reid in the upper body. An officer was heard to yell, "I'll break your f\*\*\*ing arm!" Andre Reid, in turn, yelled out, "Help, they are going to kill me!"

23. The officers lifted Andre Reid up from the ground and stood him on his feet. Two officers proceeded to tase him again, this time with simultaneous shots in the chest. The other officers then threw Andre Reid back down on the ground. As they pushed his face into the grass, Andre Reid screamed, "I can't breathe, I can't breathe."

24. A few minutes later, one of the officers observed that Andre Reid was not breathing. The officers rolled Andre Reid onto his back. The paramedics attempted CPR, but Andre Reid did not respond. He was loaded into an ambulance and taken to Northwest Medical Center in Margate.

25. Andre Reid died in the hospital two days later, as a result of the Taser-related injuries inflicted by the officers.

26. The Certification of Death issued by the State of Florida Bureau of Vital Statistics, as certified by the Broward County Associate Medical Examiner, identifies the

Manner of Death as "HOMICIDE" and the Cause of Death as "COMPLICATIONS OF AN ELECTRO-MUSCULAR DISRUPTION DEVICE," which is the formal description of a Taser.

*The Police "Investigation" and Ratification*

27. Following Andre Reid's death, the Coconut Creek Police Department conducted an intentionally inadequate investigation into their officers' conduct. Indeed, the Department initially conducted no investigation at all. Witnesses to the beating and killing of Andre Reid were not even interviewed until more than five days after the incident. Coconut Creek officials refused to acknowledge that the incident had even occurred. When a Coconut Creek Police Officer called Andre Reid's roommate, the officer stated that Andre Reid had been found in a field, beaten up and in a coma -- a knowingly false statement.

28. The Coconut Creek Police Department's plan to whitewash the homicide committed by its officers was foiled by the media, which reported Andre Reid's death and began its own efforts to speak with witnesses. The undersigned counsel likewise contacted witnesses to the beating and killing and requested public records.

29. Chief Mann first spoke publicly about the beating and tasing of Andre Reid more than a week after it happened. When doing so, Chief Mann falsely reported that Andre Reid was threatening toward the officers. He then defended his officers' actions, stating that the Taser use was "necessary for the officers' safety as well as for Mr. Reid's own safety."

30. Consistent with Chief Mann's public declaration of support for his police officers, which was made without any reasonable investigation and in direct contradiction of what the witnesses have reported, the Coconut Creek Police Department determined that its officers did



nothing wrong in their treatment of Andre Reid, thereby ratifying the gross misconduct of the four officers involved.

31. None of the four officers was suspended, or subjected to any form of discipline, as a result of the incident, thereby further ratifying their gross misconduct.

32. The response of the Coconut Creek Police Department to the beating and killing of Andre Reid reflects, and perpetuates, an existing policy of rubber-stamping officers' use of excessive force.

#### *A Family's Loss*

33. Andre Reid was born in Greenville, South Carolina, on September 14, 1975, the first child of Calvin and Mamie Reid. From childhood until the day he was killed, Andre Reid was an outgoing and friendly person.

34. Andre Reid graduated from high school in Greenville and attended college. But he then met a man who offered him a job selling meat. Andre Reid took the job and eventually moved to Atlanta, Georgia. He then moved, with the business, to South Florida roughly six years ago. The business did well, and Andre Reid was a very successful salesman.

35. Andre Reid remained in close contact with his parents, calling or texting almost every day. He also came home to South Carolina in the summer and on holidays.

36. Andre Reid fathered two sons, Christian Blake Cooper (born in 1999) and Zion Gabriel Reid (born in 2003). Though the boys did not live with him, Andre Reid recognized a responsibility for their support, supported them, stayed in touch with them, and had a solid relationship with them.

37. Andre Reid's survivors, as that term is defined in the Florida Wrongful Death Act, include his parents, Calvin and Mamie Reid, and his two minor children, Christian and Zion. As a direct and proximate result of Andre Reid's death, Christian and Zion have suffered damages including the loss of parental companionship, instruction, and guidance, mental pain and suffering, and the loss of support and services. Calvin and Mamie Reid have suffered mental pain and suffering, as well as the loss of support and services. The Estate of Andre Reid has incurred the loss of earnings and net accumulations, as well as medical, funeral, and burial expenses.

**COUNT I – CIVIL RIGHTS VIOLATIONS  
(v. Officers Individually)**

38. Plaintiffs incorporate paragraphs 2 through 37 by reference.

39. The actions of Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush during their encounter with Andre Reid occurred within the scope of their employment as police officers for the City and under color of state law.

40. Each officer participated in illegally detaining, beating, and tasing Andre Reid without any objective basis to be in fear for his safety or the safety of others or any other reasonable justification for his actions, and likewise permitted his fellow officers to do the same.

41. Their actions were motivated, at least in part, by racial animus.

42. Sgt. Freeman and Sgt. Karp had supervisory responsibility at the scene. They both personally participated in, and failed to intervene to stop, the constitutional violations.

43. These officers knew or should have known that their individual and collective conduct violated Andre Reid's clearly established civil rights under the Fourth, Eighth, and Fourteenth Amendments.



44. Any reasonable officer would be aware that this conduct violated Andre Reid's civil rights.

45. The law prohibiting such conduct as unconstitutional was clearly established at the time.

46. As a direct and proximate result of Defendants' violations of Andre Reid's civil rights, Andre Reid suffered physical injury, pain, suffering, emotional distress, disability, and death.

WHEREFORE, Plaintiffs demand judgment against Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush, jointly and severally, for all sums recoverable for a violation of 42 U.S.C. § 1983 causing injury and death, including compensatory damages, costs, interest, attorneys' fees pursuant to 42 U.S.C. § 1988, the damages identified in paragraph 37, and such further relief as may be appropriate.

**COUNT II – 42 U.S.C. § 1983 CIVIL RIGHTS VIOLATIONS  
(v. City)**

47. Plaintiffs incorporate paragraphs 2 through 37 and 39 through 46 by reference.

48. At all times material hereto, the City was responsible for the Coconut Creek Police Department, its agents and employees, including supervising, overseeing, training and establishing policies, customs, and procedures to conform their conduct to law. Its final policymaker on these matters was Chief Mann.

49. Section 943.1717(5) of the Florida Statutes reflects a recognition of the ongoing need to train law enforcement officers in the proper use of a Taser.

50. The City adopted a policy, practice, and custom of deliberate indifference and a conscious disregard for the state law, for the need to train its law enforcement officers in the proper use of a Taser, and for the public danger created by ignoring the mandated training.

51. Officers of the Coconut Creek Police Department used their Tasers on Andre Reid in a manner that violated the manufacturer's specifications and violated the training that would and should have been received. Specifically, the officers tased Andre Reid in the chest, tased him in conjunction with battering him, and tased him simultaneously with multiple stun guns.

52. The use of Taser force was unnecessary, improper, excessive, grossly unreasonable, and, ultimately, the cause of Andre Reid's death.

53. The fact that four officers, including two veteran supervisors, acted in concert, with no one voicing any dissent as Andre Reid was killed, reflects that their actions were consistent with pre-existing departmental policy, practice, or custom.

54. As a direct and proximate result of the City's policy, practice, and custom of ignoring state law, failing to train its officers in the proper use of a Taser, and tolerating the use of excessive force, Andre Reid was killed.

55. Moreover, by intentionally failing and refusing to properly investigate the violations of Andre Reid's rights, and making public declarations of support for the officers without having conducted any meaningful investigation, the City, through Chief Mann, ratified, condoned, and consented to the unlawful conduct and Fourth, Eighth, and Fourteenth Amendment violations committed by Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush. Chief Mann approved his subordinates' decisions and the bases for them.



56. The Coconut Creek Police Department thereafter completed its criminal "investigation" and fully exonerated the officers, all of whom have been returned to the Road Patrol Division with no imposition of discipline.

57. Through its adoption of the policies, practices, and customs described herein, and through its acts of ratification and approval, the City is liable, under 42 U.S.C. § 1983, for the officers' constitutional violations.

WHEREFORE, Plaintiffs demand judgment against the City for all sums recoverable for a violation of 42 U.S.C. § 1983 causing injury and death, including compensatory damages, costs, interest, attorneys' fees pursuant to 42 U.S.C. § 1988, the damages identified in paragraph 37, and such further relief as may be appropriate.

**COUNT III - Wrongful Death  
(v. City)**

58. Plaintiffs incorporate paragraphs 2 through 37 by reference.

59. The conduct of Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush, as described herein, was a direct and proximate cause of the death of Andre Reid.

60. Each of these officers was acting in the scope of his employment.

61. These officers did not act in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

62. Pursuant to Florida Statute 768.28(9), the City is vicariously liable, but the officers are not personally liable, for the wrongful death of Andre Reid.

WHEREFORE, Plaintiffs demand judgment against the City for all sums recoverable under the Florida Wrongful Death Act, including damages for the losses identified in paragraph 37, costs, interest, and such further relief as may be appropriate.

**COUNT IV - Wrongful Death  
(v. Individual Officers)**

63. Plaintiffs incorporate paragraphs 2 through 37 by reference.

64. The conduct of Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush, as described herein, was a direct and proximate cause of the death of Andre Reid.

65. These officers acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

66. The officers are personally liable for the wrongful death of Andre Reid.

WHEREFORE, Plaintiffs demand judgment against Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush, jointly and severally, for all sums recoverable under the Florida Wrongful Death Act, including damages for the losses identified in paragraph 37, costs, interest, and such further relief as may be appropriate.

**COUNT V - Assault and Battery  
(v. City)**

67. Plaintiffs incorporate paragraphs 2 through 37 by reference.

68. Andre Reid suffered numerous harmful and offensive contacts, during his encounter with the Coconut Creek Police Department officers on or about February 22, 2015, that did not cause his death.

69. Andre Reid was also placed in reasonable fear of imminent peril.

70. Each officer who assaulted and/or battered Andre Reid was acting in the scope of his employment.

71. The officers did not act in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.



72. Pursuant to Florida Statute 768.28(9), the City is vicariously liable, but the officers are not personally liable, for assault and battery of Andre Reid.

73. As a direct and proximate result of the acts of assault and battery, Andre Reid suffered damages, including bodily injury, pain and suffering, disability, disfigurement, mental anguish, emotional distress, humiliation, embarrassment, and loss of capacity of the enjoyment of life.

WHEREFORE, Plaintiffs demand judgment against the City for all sums recoverable for assault and battery, including compensatory damages, costs, interest, and such further relief as may be appropriate.

**COUNT VI - Assault and Battery  
(v. Individual Officers)**

74. Plaintiffs incorporate paragraphs 2 through 37 by reference.

75. Andre Reid suffered numerous harmful and offensive contacts, during his encounter with the Coconut Creek Police Department officers on or about February 22, 2015, that did not cause his death.

76. Andre Reid was also placed in reasonable fear of imminent peril.

77. The officers acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

78. The officers are personally liable for assault and battery of Andre Reid.

79. As a direct and proximate result of the acts of assault and battery, Andre Reid suffered damages, including bodily injury, pain and suffering, disability, disfigurement, mental anguish, emotional distress, humiliation, embarrassment, and loss of capacity of the enjoyment of life.

WHEREFORE, Plaintiffs demand judgment against Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush, jointly and severally, for all sums recoverable for assault and battery, including compensatory damages, costs, interest, and such further relief as may be appropriate.

**COUNT VII - False Arrest/False Imprisonment (v. City)**

80. Plaintiffs incorporate paragraphs 2 through 37 by reference.

81. Andre Reid was unreasonably and unlawfully restrained and deprived of his liberty, without his consent, against his will, and without legal authority.

82. Each officer who falsely arrested and imprisoned Andre Reid was acting in the scope of his employment.

83. The officers did not act in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

84. Pursuant to Florida Statute 768.28(9), the City is vicariously liable, but the officers are not personally liable, for the false arrest/false imprisonment of Andre Reid.

85. As a direct and proximate result of the acts of false arrest and false imprisonment, Andre Reid suffered damages, including bodily injury, pain and suffering, disability, disfigurement, mental anguish, emotional distress, humiliation, embarrassment, loss of capacity of the enjoyment of life, and loss of liberty.

WHEREFORE, Plaintiffs demand judgment against the City for all sums recoverable for assault and battery, including compensatory damages, costs, interest, and such further relief as may be appropriate.

**COUNT VIII - False Arrest/False Imprisonment  
(v. Individual Officers)**

86. Plaintiffs incorporate paragraphs 2 through 37 by reference.



87. Andre Reid was unreasonably and unlawfully restrained and deprived of his liberty, without his consent, against his will, and without legal authority.

88. The officers acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

89. The officers are personally liable for the false arrest and false imprisonment of Andre Reid.

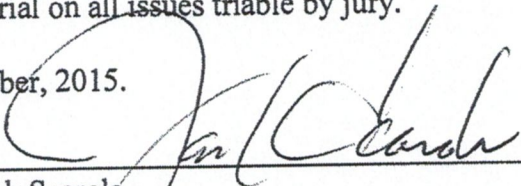
90. As a direct and proximate result of the acts of assault and battery, Andre Reid suffered damages, including bodily injury, pain and suffering, disability, disfigurement, mental anguish, emotional distress, humiliation, embarrassment, loss of capacity of the enjoyment of life, and loss of liberty.

WHEREFORE, Plaintiffs demand judgment against Sgt. Freeman, Sgt. Karp, Ofc. Eisenring, and Ofc. Rush, jointly and severally, for all sums recoverable for false arrest and false imprisonment, including compensatory damages, costs, interest, and such further relief as may be appropriate.

### **Demand for Jury Trial**

Plaintiffs hereby demand a jury trial on all issues triable by jury.

DATED this 11th day of September, 2015.



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Jack Scarola

Florida Bar No.: 169440

Patrick E. Quinlan

Florida Bar No.: 750263

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Attorneys for Plaintiffs



For Mr. Herb

How many D.C.'s?

## DEATH RECORD MEDICAL INFORMATION SHEET

DATE: May 11, 2015

TRACKING NUMBER: 2015032539

**DECEDENT INFORMATION**

NAME: CALVON ANDRE REID

DATE OF DEATH: February 24, 2015  
DATE OF BIRTH: September 14, 1975SEX: MALE  
SSN: 258-29-7992AGE: 039 YEARS  
BIRTHPLACE: GREENVILLE, SOUTH CAROLINA, UNITED STATES**PLACE OF DEATH**PLACE WHERE DEATH OCCURRED: INPATIENT  
FACILITY NAME OR STREET ADDRESS: NORTHWEST MEDICAL CTR  
LOCATION OF DEATH: MARGATE, BROWARD COUNTY, 33063**FUNERAL HOME AND DISPOSITION INFORMATION**NAME OF FUNERAL DIRECTOR: TYRONE S. WARDEN  
FUNERAL FACILITY: FUNERALS BY T S WARDEN F077572  
4315 NORTH MAIN STREET  
JACKSONVILLE, FLORIDA 32206

PHONE NUMBER: 9047651234

METHOD OF DISPOSITION: REMOVAL FROM STATE

MEDICAL EXAMINER APPROVAL NUMBER: 15-17-0571

**CERTIFIER AND ATTENDING PHYSICIAN INFORMATION**CERTIFYING PHYSICIAN: MICHAEL ROBERT STECKBAUER  
ATTENDING PHYSICIAN:  
ME CASE NUMBER: 15170571

CERTIFIER'S LICENSE NUMBER: ME109888

**CAUSE OF DEATH AND INJURY INFORMATION**TIME OF DEATH: 1928  
MANNER OF DEATH: HOMICIDE  
CAUSE OF DEATH - PART I - and Approximate Interval: Onset to Death:  
a COMPLICATIONS OF AN ELECTRO-MUSCULAR DISRUPTION DEVICE

APPROXIMATE INTERVAL

PART II - Other significant conditions contributing to death but not resulting in the underlying cause given in PART I:  
RECENT COCAINE USE, ETHANOL INTOXICATION, AND CARDIOMEGALY

WAS AN AUTOPSY PERFORMED? YES

WERE AUTOPSY FINDINGS AVAILABLE TO COMPLETE THE CAUSE OF DEATH? YES

IF SURGERY MENTIONED IN PART I OR II, REASON FOR SURGERY:

DATE OF SURGERY:

DID TOBACCO USE CONTRIBUTE TO DEATH? UNKNOWN

IF FEMALE: NOT APPLICABLE

DATE OF INJURY: February 22, 2015

TIME OF INJURY (24 hr): 0100

INJURY AT WORK? NO

LOCATION OF INJURY: 1702 ANDROS ISLE  
COCONUT CREEK, FLORIDA 33066

DESCRIBE HOW INJURY OCCURRED:

Application of an electro-muscular disruption device.

PLACE OF INJURY: PARKING LOT

IF TRANSPORTATION INJURY, Status of Decedent:

Type of Vehicle:



# AFFIDAVIT

STATE OF FLORIDA     )  
                                  ) ss:  
COUNTY OF BROWARD)

BEFORE ME, the undersigned authority, personally appeared, JOHN ARENDALE, who, after being duly sworn, under oath, deposes and says:

1. That my name is JOHN ARENDALE and my date of birth is [REDACTED]. My home address is [REDACTED] My phone number is [REDACTED] I am currently employed as a locksmith for the Broward County School Board.

2. On February 22, 2015 and at approximately between 1:00 and 1:30 AM, I was awakened with my Fiancé Bonnie Eshleman due to a disturbance outside the front door to our apartment. Bonnie and I heard loud voices and two loud popping sounds like someone shooting Tasers as we exited our bedroom and walked over to the front window of our apartment. At first, I thought it was one of my neighbors having a problem and raising his voice outside my apartment. As I looked out the front bedroom window, I observed a black male lying face down in the grassy area just beyond the sidewalk in front of my apartment. There were at least four Coconut Creek police officers in uniform surrounding this man who is now known to me as Calvin Reid. There were two officers in front of Mr. Reid and other officers were holding him face down. One of those officers was leaning down over him and had his knee pinned against Mr. Reid's back and yelled out "Ill break your fucking arm"! It looked like Mr. Reid was struggling for his life as he yelled "Baby, baby, baby, help, they're gonna to kill me"! I also happened to observe a young white female standing approximately 25 yards from Mr. Reid and watching him.

3. As I continued to observe the commotion, two of the officers lifted Mr. Reid up from the ground and stood him up onto his feet. Mr. Reid's arms may have been handcuffed behind his back when they lifted him up. Mr. Reid took a few steps in what looked like an attempt to get away from them and that's when the two officers that were standing approximately 10 feet in front of him shot him in the chest simultaneously with their Tasers. Those two officers kept holding their triggers with the wires still attached to Mr. Reid's chest. Two other officers threw him down onto the ground face first. They held him down with his face into the grass and I heard him scream "I can't breathe, I can't breathe"! All of the officers had converged onto Mr. Reid and one of the officers jumped on his back and I believe I heard him repeat the phrase "I'll break your fucking arm"! Several minutes later and after one leg was shackled with cuffs, Mr. Reid stopped moving. One of the officers observed that he wasn't breathing and they rolled him over onto his back. The paramedics were called over and they began CPR but he didn't respond.

AFFIDAVIT CONTINUED ON PAGE TWO: .....

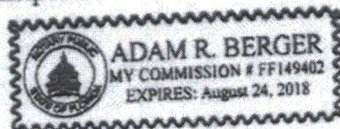
x [Signature]  
JOHN ARENDALE

PRODUCED ID: [REDACTED]

SWORN TO AND SUBSCRIBED to me this 12<sup>th</sup> day of MARCH, 2015.

My Commission Expires:

x [Signature]  
Notary Public, State of Florida



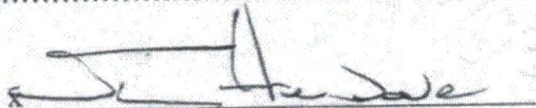


PAGE TWO OF THE AFFIDAVIT OF MR. ARENDALE:

4. Shortly after the paramedics transferred Mr. Reid to a gurney and slowly rolled him away to their rescue vehicle, I went back into my bedroom to put on a pair of shorts. I opened my front door and observed Taser wires lying on the sidewalk in front of my door. A Coconut Creek police officer ordered me to stay in my apartment and to close my door. I told him not to forget to retrieve the Taser wires in front of my door.

5. In my observation, I can't understand why the police were so aggressive with Mr. Reid. He was not aggressive, belligerent or disrespectful toward the police at any time. The police were the aggressors both physically and verbally and were very physical with Mr. Reid. It appeared that Mr. Reid just wanted to be left alone. A few days later after a video newscast of the incident and an interview of Bonnie and me with a reporter, a Coconut Creek Detective named Fuentes came to our apartment unannounced and questioned me about the incident. He observed some written notes on the kitchen table that Bonnie had memorialized about what she had observed and said he was taking them because they were evidence. He allowed me to copy the notes so I still have a copy.

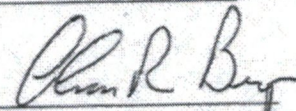
I have not heard back from Detective Fuentes or anyone else at the Coconut Creek Police Dept. As a result of observing the way the police handled Mr. Reid, my perception of the police has changed. At least two or three of the police used excessive force and were culpable for his death. FURTHER SAYETH YOUR AFFIANT NOT:.....

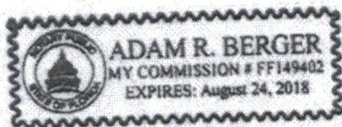
  
JOHN ARENDALE

PRODUCED ID: 

SWORN TO AND SUBSCRIBED to me this 12<sup>th</sup> day of MARCH, 2015.

My Commission Expires:

x   
Notary Public, State of Florida





# AFFIDAVIT

STATE OF FLORIDA )  
 ) ss:  
COUNTY OF BROWARD)

BEFORE ME, the undersigned authority, personally appeared, BONNIE C. ESHLEMAN, who, after being duly sworn, under oath, deposes and says:

1. That my name is BONNIE C. ESHLEMAN and my date of birth is [REDACTED]  
[REDACTED] My home address is [REDACTED] My phone number is [REDACTED]

2. On February 22, 2015 and at approximately between 1:00 and 1:30 AM, I was awakened with my Fiancé John Arendale due to a disturbance and frightening yell outside the front door to our apartment. John and I heard loud voices and two loud popping sounds as we walked out of our bedroom and went over to the front window of our apartment. At first, one of the voices sounded just like my neighbor's voice and I thought he was having a problem. When I looked out the kitchen window, I observed a black male lying face down in the grassy area just beyond the sidewalk and the hedges in front of my apartment. There were at least four Coconut Creek police officers in uniform surrounding this man who is now known to me as Calvin Reid. Some of the officers were holding him face down on the ground and other officers were nearby. One of those officers was leaning down on Mr. Reid's back and pinning him against the ground when that officer yelled out "I'll break your fucking arm"! An officer walked around toward his head and swung and struck him very hard on or near his upper body with a foot long dark colored stick or baton. Mr. Reid was struggling for his life and he yelled "Baby, baby, baby, help, they're gonna to kill me"! I also heard him scream "I can't breathe, I can't breathe"! While this was occurring, I glanced around and observed a young white female standing approximately 20 to 25 yards away and watching this commotion.

3. During this time that Mr. Reid was being held face down by the officers, he may have been handcuffed behind his back. I couldn't see everything because the police were partially blocking my view. However, I did see two of the officers lift Mr. Reid up from the ground and stand him up onto his feet. The other officers were still within several feet of Mr. Reid when he took a few steps forward in what appeared to be an attempt to get away from these officers. That is when two officers that were standing approximately 10 feet from him shot him simultaneously with their Taser Guns. The other officers threw him face down onto the ground and held his face into the grass. He may also have repeated the phrase "I can't breathe, I can't breathe"! AFFIDAVIT CONTINUED ON PAGE TWO: .....

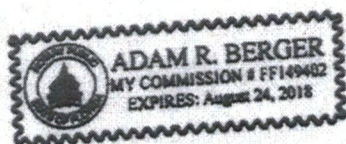
x Bonnie Eshleman  
BONNIE C. ESHLEMAN

PRODUCED ID: [REDACTED]

SWORN TO AND SUBSCRIBED to me this 12<sup>th</sup> day of MARCH, 2015.

My Commission Expires:

x Adam R. Berger  
Notary Public, State of Florida





PAGE TWO OF THE AFFIDAVIT OF BONNIE C. ESHLEMAN:

All of the officers had converged onto Mr. Reid. Several minutes later and after one of his legs had cuffs on it, Mr. Reid wasn't moving at all. One of the officers asked the other "Is he breathing?" at which time they rolled him over onto his back. One of the officers called over a male paramedic who calmly walked over and began to perform CPR. After a few minutes, a female paramedic came over and she continued performing CPR. However, there was no response from Mr. Reid.

4. After the paramedics stopped performing CPR on Mr. Reid, they displayed no urgency transferring him to a gurney and they casually rolled him away to their ambulance. When they departed the scene, they slowly drove away and didn't turn on their flashing overhead lights.

5. At no time during my observation of this event was Mr. Reid aggressive or disrespectful toward the police. However the police were very aggressive both verbally and physically with Mr. Reid. It appeared that Mr. Reid just wanted to be left alone.  
FURTHER SAYETH YOUR AFFIANT NOT:.....

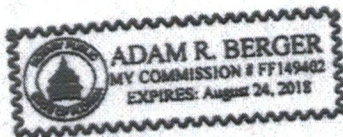
x Bonnie Eshleman  
BONNIE C. ESHLEMAN

PRODUCED ID: [REDACTED]

SWORN TO AND SUBSCRIBED to me this 12<sup>th</sup> day of MARCH, 2015.

My Commission Expires:

x Adam R. Berger  
Notary Public, State of Florida





# INCIDENT REPORT PUBLIC COPY

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Agency Name <b>Coconut Creek Police Department</b>
ORI <b>FL 0061100</b>

Case# <b>2015-04775</b>
Date / Time Reported <b>02/22/2015 01:08 Sun</b>
Last Known Secure <b>02/22/2015 01:00 Sun</b>
At Found <b>02/22/2015 01:08 Sun</b>

Location of Incident <b>1702 Andros Isle, Coconut Creek FL 33066-</b>		Premise Type <b>Parking Lot/area</b>	Zone/Tract <b>2</b>	Activity
#1	Crime Incident(s) <b>Sick Person-baker Act</b>	Weapon / Tools <b>None</b>		Security
	<b>SIB</b>	Entry	Exit	
#2	Crime Incident	Weapon / Tools		Security
		Entry	Exit	
#3	Crime Incident	Weapon / Tools		Security
		Entry	Exit	

MO		Injury		Domestic: 00	
# of Victims <b>0</b>	Type	Victim of Crime #	DOB	Race	Sex
Victim/Business Name (Last, First, Middle)		Age	Relationship To Offender	Resident Status	Military Branch/Status
Home Address		Home Phone			
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)	
Type	INJURY: INDIVIDUAL (NOT A LE OFFICER)
Code	SB
Name (Last, First, Middle)	REID, CALVON ANDRELEUS
Victim of Crime #	Age 39
DOB	Race B Sex M
Relationship To Offender	Resident Status
Home Phone	
Home Address	
Employer Name/Address	

Type	INJURY: INDIVIDUAL (NOT A LE OFFICER)
Code	IO
Name (Last, First, Middle)	REID, MAMIE M
Victim of Crime #	Age 67
DOB	Race B Sex F
Relationship To Offender	Resident Status Non-Resident
Home Phone	
Home Address	
Employer Name/Address	

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	Value	OJ	QTY	Property Description	Make/Model	Serial Number	

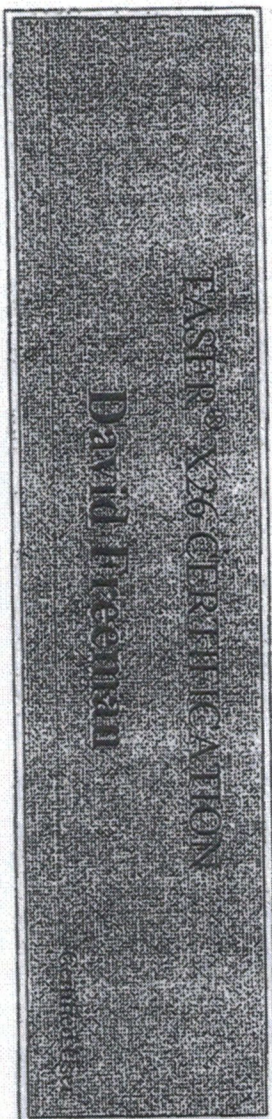
Officer/ID#	<b>RUSH, D. (PTRL, U266) (18374)</b>	Supervisor	<b>FREEMAN, D. (PTRL, D2) (13749)</b>
Invest ID#	<b>FUENTES, F. (CID, K8) (18331)</b>	Case Disposition	<b>Page 1</b>
Status	Complainant Signature	Case Status	<b>Active/pending</b>
		Sys#	<b>515187</b>





**TASER**  
INTERNATIONAL®

**MANDATORY  
RETRAINING**



*This Certifies that*

**David Freeman**

*is trained in the proper and safe use of the TASER® X26 Electronic Control Device and has passed the requirements of the  
Coconut Creek Police Department TASER X26 training program under the supervision of a Certified Instructor.*

*In Witness Whereof, Certified Instructor*

*Christopher Beroldi has certified the successful completion of the training requirements this day:*

*August 8, 2006 (8 hours)*

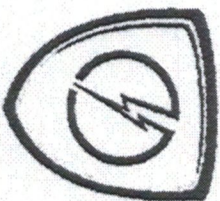
*Certified Instructor:*

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*Certified Instructor ID:*

**15016**



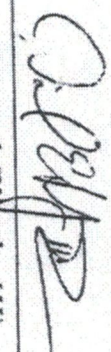


**TASER**  
TRAINING ACADEMY

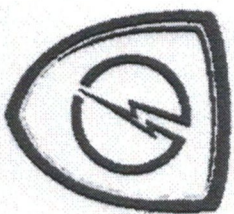
**TASER Conducted Electrical Weapon  
TASER Certified End User Certificate**

**Thomas Eisenring**

*This certifies that the above named individual ("the Student") has completed the training required and has passed a written examination in the use of the TASER X26/X26P Conducted Electrical Weapon. By accepting this User Certificate, the Student accepts the terms of the TASER Training Materials License Agreement, incorporated herein by reference, and agrees to be bound by its terms as a Licensee of TASER International, Inc. This certification must be renewed annually.*

Instructor:  Date 3/27/2014  
(Daniel Eberly III)





# **TASER**

## **TRAINING ACADEMY**

### **TASER Conducted Electrical Weapon TASER Certified End User Certificate**

**Daniel Rush**

*This certifies that the above named individual ("the Student") has completed the training required and has passed a written examination in the use of the TASER X26 Conducted Electrical Weapon. By accepting this User Certificate, the Student accepts the terms of the TASER Training Materials License Agreement, incorporated herein by reference, and agrees to be bound by its terms as a Licensee of TASER International, Inc. This certification must be renewed annually.*

*Instructor: Beroldi, Christopher Date 5/8/13*





**TASER**  
PROTECT LIFE

**TASER X26**

**Michael Mann**

Certified User

*This Certifies that*

**Michael Mann**

*is trained in the proper and safe use of the TASER® X26 Electronic Control Device  
and has passed the requirements of the Coconut Creek Police Department TASER X26 training program under the  
supervision of a Certified Instructor.*

*In Witness Whereof, Certified Instructor*

**Christopher Beroldi**

*has certified the successful completion of the training requirements this day:*

**January 19, 2012**

*Certified Instructor:*

*Certified Instructor ID:*

**031009553821412871346C**