

IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT
IN AND FOR DUVAL COUNTY, FLORIDA

CHARLIE JUNIOR FAGGART, II,
as personal representative of the ESTATE
OF CHARLES PATRICK FAGGART,

Plaintiff,

Case No. _____

v.

SHERIFF T.K. WATERS, in his official capacity
as Sheriff of Duval County, Florida, and
JACKSONVILLE SHERIFF'S OFFICE,

**IMMEDIATE HEARING
REQUESTED PURSUANT TO
SECTION 119.11(1), FLA. STAT.**

Defendants.
_____ /

COMPLAINT TO ENFORCE PUBLIC RECORDS ACT

Plaintiff Charlie Junior Faggart, II ("Plaintiff"), through counsel and pursuant to article I, section 24(a) of the Florida Constitution and section 119.11(1), Florida Statutes, files this Complaint and Petition for Writ of Mandamus against Defendants Sheriff T.K. Waters and Jacksonville Sheriff's Office (collectively, "Defendants"), to enforce Florida's Public Records Act.

Pursuant to section 119.11(1), Plaintiff seeks an immediate hearing to determine whether Defendants are obligated to perform statutory duties under the Public Records Act (the "Act" or "PRA"). Under the Act, "[w]henever an action is filed to enforce the provisions of this chapter, the court shall set an immediate hearing, giving the case priority over other pending cases." § 119.11, Fla. Stat.; *See Clay Cnty. Educ. Ass'n v. Clay Cnty. Sch. Bd.*, 144 So. 3d 708, 709 (Fla. 1st DCA 2014) (immediate hearing was required when action seeking public records is filed); *Salvador v. Fennelly*, 593 So. 2d 1091 (Fla. 4th DCA 1992).

In support, Plaintiff states:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to Article V, Section 5(b) of the Florida Constitution and Section 119.11 of the Florida Statutes.

2. Venue is proper in Duval County, Florida because the public records at issue are located there.

3. All conditions precedent to this action have occurred or have been excused or waived. Specifically, Plaintiff has provided Defendants with presuit notice under 119.12(1)(b), Florida Statutes, for the public records request at issue.

PARTIES

4. Plaintiff Charlie Junior Faggart, II, is the duly appointed personal representative of the Estate of Charles Patrick Faggart, 2025-CP-1384 (4th Jud. Cir. Ct. Fla.), and is Charles's father. He is a resident of Duval County, Florida, and is otherwise *sui juris*. He sues in his capacity as personal representative.

5. Defendant Sheriff T.K. Waters is the Sheriff of Duval County, Florida. He is sued in his official capacity only. In that capacity and on behalf of Jacksonville Sheriff's Office, Sheriff Waters is subject to Article I, Section 24 of the Florida Constitution and the PRA. As such, Sheriff Waters has a legal duty to permit the inspection, examination, and copying of its records by any person. *See* § 119.07, Fla. Stat.

6. Defendant Jacksonville Sheriff's Office ("JSO") is an agency as defined by Section 119.011(2), Florida Statutes. JSO is subject to Article I, Section 24 of the Florida Constitution and the PRA. As such, JSO has a legal duty to permit the inspection, examination, and copying of its records by any person. *See* § 119.07, Fla. Stat.

FACTUAL BACKGROUND

7. Charles Faggart, a beloved father and local chef, was booked by JSO at the jail on April 1, 2025.

8. While in custody, in the early morning hours on April 7, 2025, several JSO correctional officers were involved in an incident with Charles.

9. According to the heavily redacted report provided by Defendants, which was written by one of the corrections officers now suspended by Sheriff Waters, Charles was displaying erratic behavior, allegedly due to which staff placed him in a restraint chair. The report indicates that Charles struggled with the officers, but their response, and what they did to Charles, is redacted from the report. Other information in the report suggests that JSO officers administered chemical agents, as a nurse flushed Charles's eyes; he also suffered lung damage.

10. An hour after being placed in the restraint chair, Charles was removed but then placed back in it several minutes later. The information surrounding the circumstances here is redacted.

11. Indeed, almost every other salient detail about what happened to Charles at the jail is redacted.

12. Not only that, but Defendants have refused to provide video footage or any other reports concerning the incident.

13. Two hours later, emergency services arrived at the jail. Charles was transported by emergency services to Shands Hospital in Jacksonville.

14. Upon arrival, Charles was unresponsive, in a fatal condition and doctors made note of his bleeding and bruised face. Charles suffered multiple injuries throughout his body and

significant damage to his kidneys and liver. Taser barbs were removed from Charles's back by hospital staff.

15. Ultimately, Charles was diagnosed with anoxic brain injury, with a CT scan showing diffuse loss of gray-white matter differentiation and cerebral edema. He died at Shands on April 10, 2025.

16. Following Charles's death, JSO began investigating the nine (9) officers involved in the incident leading to his death. Those officers were stripped of their corrections authority pending the investigation.

17. Several months after Charles's death, Defendants completed their investigation. *See* Tobie Nell Perkins, *Sheriff: JSO has completed its investigation into Charles Faggart's death, waiting on state attorney*, FIRST COAST NEWS (July 7, 2025), www.firstcoastnews.com/article/news/local/sheriff-jso-completed-investigation-charles-faggarts-death/77-b582034f-a92c-46c9-af9d-6c136b6f49a5. (“The Jacksonville Sheriff's Office internal investigation into the officers involved in the incident that killed Charles Faggart has concluded, Jacksonville Sheriff T.K. Waters confirmed to First Coast News Monday.”).

18. According to that reporting, which was confirmed by Sheriff Waters, JSO was waiting on the State Attorney's Office to complete its investigation. *See id.* The Federal Bureau of Investigation was also brought in, and as of September 2025, oversaw prosecutorial investigation. *See* Jenese Harris, *Questions remain 6 months after JSO 'incident' that led to inmate's death*, NEWS4JAX (Oct. 7, 2025), <https://www.news4jax.com/news/local/2025/10/07/questions-remain-6-months-after-jso-incident-that-led-to-inmates-death/>; *see also* Nate Monroe & Nichole Manna, *Federal prosecutors subpoena first responders in controversial Duval jail death*, FLORIDA

TRIBUTARY (Sept. 25, 2025), <https://floridatrib.org/2025/09/25/federal-prosecutors-subpoena-first-responders-in-controversial-duval-jail-death/>.

The Public Records Request

19. Days following Charles’s death, Plaintiff, through counsel, issued the following public records request (the “Request”) to Defendants:

a. Incident-Specific Records:

i. All incident reports related to the death of Charles Faggart, including:

1. Initial and supplemental reports.
2. Use-of-force reports.
3. Incident reviews.
4. Internal affairs reports.
5. All 911 calls, dispatch logs, and CAD (Computer Aided Dispatch) records related to the incident.
6. Body-worn camera footage of any officers who interacted with Charles Faggart.
7. Jail surveillance video: All angles from all locations where Mr. Faggart was housed, transported, or interacted with staff (including his cell, hallways, medical areas, booking, restraint areas, etc.).
8. All photographs taken of Mr. Faggart before, during, and after the incident, including in-cell, during medical attention, and post-incident/coroner or crime scene photos.

b. Custody & Classification Records:

- i. Complete booking file for Charles Faggart

- ii. Arrest affidavit, warrant, or charging documents
 - iii. Jail classification records
 - iv. Housing assignment and reassignment logs
 - v. Inmate movement logs showing all movements of Mr. Faggart during custody
 - vi. Cell assignment records and list of any cellmates
 - vii. Any documented warnings or alerts in his file:
 - i. Mental health flags
 - ii. Suicide watch records
 - iii. Medical condition alerts
 - iv. Protective custody or safety concern notations
- c. Medical Records & Logs:
- i. All medical intake and screening records
 - ii. All sick call slips, medical request forms, grievances or kites submitted by Mr. Faggart
 - iii. Medication Administration Records (MAR)
 - iv. Logs of all visits by nursing or medical staff
 - v. Vital sign records and daily wellness checks
 - vi. Reports or notes created by medical staff in connection with the incident
- d. Jail Communications:
- i. All recorded jail phone calls made or received by Charles Faggart during his incarceration

- ii. Any jail kiosk messages, email correspondence, or text messages sent by Mr. Faggart
- e. Staff Records (Related to Officers Involved in the Incident): Request the following for each officer listed below:
 - i. Sgt. W.H. Cox #76320
 - ii. Ofc. T.C. Pennamon #88613
 - iii. Ofc. G.L. McKinnis #86574
 - iv. Ofc. D.D. Thomas #82590
 - v. Ofc. M.E. Sullivan #84331
 - vi. Ofc. P.L. Collins #88641
 - vii. Ofc. A.K. Maygoo #88643
 - viii. Ofc. E. Kurtovic #84333
 - ix. Ofc. J.J. Bullard #88012

Documents to include:

- i. Complete rosters of all staff on duty during the incident.
- ii. Shift schedules for the above officers for the relevant period.
- iii. Duty logs and post assignments for housing and supervision during Mr. Faggart's custody.
- iv. Disciplinary records and internal affairs complaints (especially any involving use-of-force or misconduct).
- v. All training records, including:
 - 1. Use of force Restraint techniques;
 - 2. Medical emergency response;

3. Mental health and suicide prevention;
4. Naloxone/Narcan administration; and
5. Inmate supervision.

f. Policies & Procedures (Current and Revised):

i. Request all current JSO Corrections Division policies, along with any updates from the past 3 years, related to:

1. Inmate medical care
2. Medical emergencies and first response protocols
3. Use of force Inmate observation, cell checks, and wellness checks
4. Classification and housing assignments
5. Suicide prevention and mental health protocols
6. Drug overdoses and Narcan administration
7. Reporting and investigating inmate deaths
8. Use of restraint chairs
9. Use of chemical agents (e.g., pepper spray)
10. Use of spit masks
11. Use of tasers

20. Defendants received the request on April 14, 2025, and assigned it a tracking number (P459107-041425). *See* Request and Tracking Response, attached as **Exhibit 1**.

21. In response to the Request, Defendants produced the attached redacted incident report along with personnel files, policies and other information and records. *See* Redacted Report, attached as **Exhibit 2**.

22. Despite confirming with the media that they have finished their investigation, and even though the records requested are those generated in the normal course of business and not in preparation for or during an active criminal investigation, Defendants have refused to provide unredacted incident reports and video footage from inside the jail.

23. On March 20, 2026, Plaintiff issued the attached notice of intent under section 119.12(1)(b), Fla. Stat., to Defendants for their failure to produce all responsive records without redaction. *See* Notice of Intent, attached as **Exhibit 3**.

24. In response, Defendants noted that they had closed the pending request. In response Defendants stated that: “No other documents are releasable at this time due to the following: The case you are requesting is an active Criminal Investigation as defined by FSS § 119.011(d)(2): “... criminal intelligence and criminal investigative information shall be considered “active” while such information is directly related to pending prosecutions or appeals”. Therefore, pursuant to FSS § 119.071(c)1 [Active criminal intelligence information and active criminal investigative information are exempt from s. 119.07(1) and s. 24(a), Art. I of the State Constitution] this case is not available for dissemination. Once either Discovery has been made through the court, or a subpoena has been received for the requested information, complete information will be available for the defendant and /or their legal advisor.” *See* Response to Notice of Intent, attached as **Exhibit 4**.

ARGUMENT

25. Florida appellate courts have recognized that it is the policy of the legislature and courts to expedite proceedings involving denial of access to public records. *See News-Press Pub. Co., Inc. v. Gadd*, 388 So.2d 276, 277 (Fla. 2nd DCA 1980). “The availability of public records for inspection is and will continue to be a unique issue that deserves an expeditious determination

if the public records law is to have meaning.” *Roberts v. News-Press Pub. Co., Inc.*, 409 So.2d 1089, 1092 (Fla. 2nd DCA 1982).

26. Mandamus is the appropriate remedy to enforce violations of the public records law. *Williams v. State*, 163 So.3d 618, 620 (Fla. 4th DCA 2015) (mandamus is an appropriate remedy to compel the timely production of public records requested under chapter 119); *Smith v. State*, 696 So. 2d 814, 816 (Fla. 2nd DCA 1997) (for purposes of mandamus relief under the Public Records Act, disclosure of public records is a mandatory act).

27. In *Radford v. Brock*, 914 So.2d 1066 (Fla. 2nd DCA 2006), the Second District Court of Appeal outlined the requirements for issuance of an alternative writ of mandamus:

A party petitioning for a writ of mandamus must establish a clear legal right to performance of the act requested, an indisputable legal duty, and no adequate remedy at law. When a trial court receives a petition for a writ of mandamus, its initial task is assessing the petition to determine whether it is facially sufficient. If it is not facially sufficient, the court may dismiss the petition. If the petition is facially sufficient, the court must issue an alternative writ of mandamus requiring the respondent to show cause why the writ should not be issued.

914 So. 2d at 1067-68 (internal citations and quotation marks omitted); *see also Moore v. Ake*, 639 So. 2d 697, 698 (Fla. 2nd DCA 1997) (a petitioner is not required to serve the respondent with the complaint and could not serve the alternative writ until the trial court had performed the tasks required of it under the rule).

28. To be entitled to a writ of mandamus, a party must allege a violation of a clear legal right and the breach of an indisputable legal duty. *Clay Cnty Educ. Ass’n v. Clay Cnty. Sch. Bd.*, 144 So. 3d 708, 709 (Fla. 1st DCA 2014). Section 119.07(1), Florida Statutes, provides that:

Every person who has custody of a public record shall permit the record to be inspected and copied by any person desiring to do so, at any reasonable time, under reasonable conditions, and under supervision by the custodian of the public records.

§ 119.07(1), Fl. Stat. All citizens of this state enjoy the right to inspect public records. Indeed, this right is not only a statutory right under § 119.07(1), Fla. Stat., but has been elevated by the citizens of Florida to constitutional status. Art. I, § 24(a), Fla. Const. The Act was enacted to promote public awareness and knowledge of government actions in order to ensure that governmental officials and agencies remain accountable to the people. *WFTV, Inc. v. Sch. Bd. of Seminole Cnty.*, 874 So. 2d 48, 52 (Fla. 5th DCA 2004).

29. As custodian of public records, Defendants have a mandatory and non-discretionary duty to permit the inspection of all public records without unreasonable delay. *See Morris Publ'g Grp.*, 154 So. 3d at 533; *see also* Art. I § 24(a), Fla. Const., and § 119.07(1), Fla. Stat.

30. Here, the Court should issue an alternative writ of mandamus to show cause why the Complaint should not be granted. *See* Fla. R. Civ. P. 1.630.

31. First, Defendants' reliance on the active criminal investigation exemption to hide the contents of report generated in the ordinary course of business and video footage depicting the incident is inapposite.

32. While the exemption furthers "the critical importance of preserving the confidentiality of police records surrounding and compiled during an active criminal investigation," *City of Riviera Beach v. Barfield*, 642 So.2d 1135, 1136 (Fla 4th DCA 1994), and is intended to "prevent premature disclosure of information during an ongoing investigation being conducted in good faith by criminal justice authorities," *see Barfield v. City of Ft. Lauderdale Police Dep't*, 639 So.2d 1012, 1017 (Fla. 4th DCA 1994), it is not absolute.

33. That is, the "legislature fully comprehended that disclosure of the status of a criminal investigation by requiring production of particular information **developed during its**

progress would often impede the development of new leads and prevent successful conclusion of the investigation and the arrest of the offender.” *Fla. Freedom Newspapers, Inc. v. Dempsey*, 478 So.2d 1128, 1131 (Fla. 1st DCA 1985) (emphasis supplied).

34. While investigative reports and surveillance can be information compiled for a criminal investigation under § 119.011(3)(b), Fla. Stat., here Defendants require officers to write incident reports regardless of whether they involve criminality or would lead to prosecution. And Defendants surveil the jail for all sorts of purposes, not simply to compile information for potential criminal investigations. *State Attorney's Off. of Seventeenth Jud. Cir. v. Cable News Network, Inc.*, 251 So. 3d 205, 212 (Fla. 4th DCA 2018) (“In sum, the videos were not ‘criminal investigative information’ within the meaning of section 119.011(3)(b) because they were not compiled by a criminal justice agency in the course of conducting a criminal investigation.”); *see also id.* (“information filed before an investigative process begins cannot be criminal investigative information,” quoting *Tribune Co. v. Cannella*, 438 So.2d 516 (Fla. 2d DCA 1983), *quashed on other grounds*, 458 So.2d 1075 (Fla. 1984)); *see also* Op. Att’y Gen. Fla. 080-96 (1980).

35. Second, because the exemption does not apply to the reports generated in the normal course of business and surveillance footage—and Defendants have not invoked any other exemptions—the Court should find that they have unlawfully delayed in responding to Plaintiff’s request.

36. The Florida Supreme Court has stressed that the only permissible delay in producing records pursuant to the Public Records Act “is the limited reasonable time allowed the custodian to retrieve the record and delete those portions of the record the custodian asserts are exempt.” *Tribune Co. v. Cannella*, 458 So. 2d 1075, 1079 (Fla. 1984). In *Cannella*, the Court held that the City of Tampa violated the PRA by implementing an automatic 24-hour delay in producing

personnel files in order to allow the employees to review the files. 458 So. 2d at 1078. Although there is no fixed time frame for complying with public records requests, unreasonable and excessive delays in producing records constitute an unlawful refusal to provide access to public records. *See, e.g., Town of Manalapan v. Rechler*, 674 So. 2d 789, 790 (Fla. 4th DCA 1996); *Promenade D'Iberville, LLC v. Sundy*, 145 So. 3d 980, 983 (Fla. 1st DCA 2014) (“Unjustified delay in making non-exempt public records available violates Florida’s public records law.”) (60-day delay unlawful); *Off. of State Att’y for Thirteenth Jud. Cir. of Fla. v. Gonzalez*, 953 So. 2d 759, 765 (Fla. 2d DCA 2007) (90-day delay tantamount to refusal); *Grapski v. City of Alachua*, 31 So.3d 193, 197 (Fla. 1st DCA 2010) (strategic delay unlawful).

CAUSE OF ACTION
Unlawful Refusal to Provide Public Records
(against all Defendants)

Plaintiff incorporates the allegations contained in paragraphs 1 through 36 and all referenced exhibits, as if fully set forth herein.

37. The records requested are public records as encompassed by Article I, Section 24(a) of the Florida Constitution, defined in Section 119.011(12), Florida Statutes, and as interpreted by Florida courts.

38. The constitutional right of access to public records applies to “any public body, officer, or employee of the state, or persons acting on their behalf” *See* Art. I, § 24, Fla. Const.

39. Defendants are a “public body” under Article I, Section 24 of the Florida Constitution.

40. Defendants are also a public agency as defined in section 119.011(2), Florida Statutes.

41. Defendants have both a constitutional and statutory legal obligation pursuant to section 119.07, Florida Statutes to provide access to and copies of any non-exempt public records upon request.

42. No public records law exemptions exist that would prevent the inspection or copying of the records requested by Plaintiff.

43. Defendants have failed and refused to provide the records requested by Plaintiff.

44. Defendants' failure, refusal, and related delay in providing the public records requested violates Chapter 119, Florida Statutes, and Article I, Section 24(a) of the Florida Constitution.

REQUEST FOR IMMEDIATE HEARING

45. Section 119.11(1), Florida Statutes, provides that courts are to set immediate hearings in actions to enforce the provisions of the PRA and are to give such cases priority over other pending cases. *See Salvador v. Fennelly*, 593 So. 2d 1091, 1094 (Fla. 4th DCA 1992) (recognizing the importance of the statutory provision for immediate hearings in PRA cases because "time can sometimes be an important element in the right of access to public records").

46. Although Defendants have unlawfully delayed for almost a year, time is still an important element here. As referenced above, by continuing to delay production of these records, Defendants are significantly limiting Plaintiff's ability and right to seek redress for the death of his son on behalf of the estate and his son's survivors.

47. Plaintiff therefore requests an immediate hearing (telephonic or otherwise) and that this case be given priority over other pending cases.

REQUEST FOR ATTORNEYS' FEES

48. Section 119.12, Florida Statutes provides that “[i]f a civil action is filed against an agency to enforce the provisions of this chapter, the court shall assess and award the reasonable costs of enforcement, including reasonable attorney fees, against the responsible agency if ... [t]he agency unlawfully refused to permit a public record to be inspected or copied[.]”

49. Defendants have unlawfully refused to permit the inspection and copying of the public records at issue in this lawsuit.

50. Plaintiff is therefore entitled to all reasonable costs, including its attorneys’ fees, incurred in enforcing his right to access the subject public records as set forth in section 119.12, Florida Statutes.

51. Plaintiff provided Defendants with presuit notice under 119.12(1)(b), Florida Statutes, more than five business days prior to the filing of this lawsuit.

52. Plaintiff has retained undersigned counsel in this matter.

53. Plaintiff is entitled to recovery of all of the above fees, costs and expenses.

RELIEF REQUESTED

WHEREFORE, Plaintiff Charlie Faggart, II, as personal representative of the Estate of Charles Faggart, requests that this Court:

- (a) Set an immediate hearing pursuant to section 119.11(1), Florida Statutes;
- (b) Find that the records requested are public records subject to disclosure under the PRA and Article I, Section 24 of the Florida Constitution, to which no valid exemption applies;
- (c) Find that Defendants unlawfully delayed and refused to permit access to the records requested violation of the PRA and Article I, Section 24 of the Florida Constitution;

- (d) Order Defendants to immediately provide to Plaintiff all outstanding records responsive to his public records request at issue in this lawsuit;
- (e) Award Plaintiff his reasonable attorneys' fees and costs incurred in this action, as provided in section 119.12, Florida Statutes;
- (f) Grant Plaintiff such additional and further relief as this Court deems just and proper.

Dated: April 7, 2026

Respectfully submitted,

BY: /s/ Belkis Plata

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EXHIBIT 1



Outlook

FW: Public Records Request :: P459107-041425

From Belkis Plata <belkis@plataschott.com>
Date Mon 4/14/2025 4:15 PM
To Michelle Muneton <michelle@plataschott.com>
Cc Plata Schott Law <support@plataschott.com>

Regards,

Belkis Plata, B.C.S.
O: (904) 619-5244

From: JSO - GovQA <jacksonvilleso@mycusthelp.net>
Sent: Monday, April 14, 2025 3:57 PM
To: Belkis Plata <belkis@plataschott.com>
Subject: Public Records Request :: P459107-041425



Dear Belkis Plata:

Thank you for your interest in public records of Jacksonville Sheriff's Office. Your request has been received and is being processed. Your request was received in this office on 4/14/2025 and given the reference number P459107-041425 for tracking purposes.

1. Incident-Specific Records All incident reports related to the death of Charles Faggart, including: Initial and supplemental reports Use-of-force reports Incident reviews Internal affairs reports All 911 calls, dispatch logs, and CAD (Computer Aided Dispatch) records related to the incident Body-worn camera footage of any officers who interacted with Charles Faggart Jail surveillance video: All angles from all locations where Mr. Faggart was housed, transported, or interacted with staff (including

his cell, hallways, medical areas, booking, restraint areas, etc.) All photographs taken of Mr. Faggart before, during, and after the incident, including in-cell, during medical attention, and post-incident/coroner or crime scene photos

2. Custody & Classification Records Complete booking file for Charles Faggart Arrest affidavit, warrant, or charging documents Jail classification records Housing assignment and reassignment logs Inmate movement logs showing all movements of Mr. Faggart during custody Cell assignment records and list of any cellmates Any documented warnings or alerts in his file: Mental health flags Suicide watch records Medical condition alerts Protective custody or safety concern notations

3. Medical Records & Logs All medical intake and screening records All sick call slips, medical request forms, grievances or kites submitted by Mr. Faggart Medication Administration Records (MAR) Logs of all visits by nursing or medical staff Vital sign records and daily wellness checks Reports or notes created by medical staff in connection with the incident

4. Jail Communications All recorded jail phone calls made or received by Charles Faggart during his incarceration Any jail kiosk messages, email correspondence, or text messages sent by Mr. Faggart

5. Staff Records (Related to Officers Involved in the Incident) Request the following for each officer listed below: Sgt. W.H. Cox #76320 Ofc. T.C. Pennamon #88613 Ofc. G.L. McKinnis #86574 Ofc. D.D. Thomas #82590 Ofc. M.E. Sullivan #84331 Ofc. P.L. Collins #88641 Ofc. A.K. Maygoo #88643 Ofc. E. Kurtovic #84333 Ofc. J.J. Bullard #88012 Documents to include: Complete rosters of all staff on duty during the incident Shift schedules for the above officers for the relevant period Duty logs and post assignments for housing and supervision during Mr. Faggart's custody Disciplinary records and internal affairs complaints (especially any involving use-of-force or misconduct) All training records, including: Use of force Restraint techniques Medical emergency response Mental health and suicide prevention Naloxone/Narcan administration Inmate supervision

6. Policies & Procedures (Current and Revised) Request all current JSO Corrections Division policies, along with any updates from the past 3 years, related to: Inmate medical care Medical emergencies and first response protocols Use of force Inmate observation, cell checks, and wellness checks Classification and housing assignments Suicide prevention and mental health protocols Drug overdoses and Narcan administration Reporting and investigating inmate deaths Use of restraint chairs Use of chemical agents (e.g., pepper spray) Use of spit masks Use of tasers

Your request will be forwarded to the relevant person(s) to locate the information you seek and to determine the volume and any costs associated with satisfying your request. You will be contacted about the availability and/or provided with copies of the records in question.

Please note, if you are requesting Body Worn Camera (BWC) footage, the BWC Unit is currently experiencing a high volume of requests, resulting in a backlog. The estimated time to fulfill a request is approximately six to eight months from the date it is received. Thank you for your patience.

To monitor the progress or update this request please log into the [Public Records Center](#).

EXHIBIT 2



2025-0199183

Route To

Groups: **CORRECTIONS**
People:

Incident Information

Incident Location

500 ADAMS ST E Day/Date/Time Reported: **Monday, 04/07/2025 15:22**
JACKSONVILLE, FL 32202 Day/Date/Time Incident From: **Monday, 04/07/2025 07:04** To: **Monday, 04/07/2025 09:10**
Sub-sector: **A1** TAZ: **97** Is this a Corrections Information Report?: **YES**
Location Type: **JAIL / PRISON**
Primary Weapon Used: **PERSONAL WEAPONS (HANDS/ FIST/ FEET/TEETH/ETC.)**
School Name: School Number:
Incident Occurred: **Inside Location** Incident Occurred In the Parking Lot at this Location?: **NO**

Corrections Facility

Facility where incident occurred: **PDF** Floor/UOA: **6W** DORM/Pod: **2A** Cell: **N/A**
Disciplinary Action Report: **N/A** Medical Exam Required?: **YES** Suspected Medical Emergency: **SEIZURE (WITNESSED)**
Employee or Other Type: **HEALTH SERVICES** Primary Medical Care Giver:
Medical Staff Response Date/Time: **04/07/2025 15:21** Transported via Fire/Rescue?: **YES**
Transported to ER?: **YES** Transported via DOC Van?: **YES**

Other Corrections Officers Present

Officer Name and ID	Officer Name and ID
T.C. PENNAMON (#88613)	P.L. COLLINS (#88641)
G.L. MCKINNIS JR (#86574)	A.K. MAYGOO (#88643)
D.D. THOMAS (#82590)	J.W. CLIFTON (#83565)
W.H. COX (#76320)	E. KURTOVIC (#84333)
M.E. SULLIVAN III (#84331)	L. DICKENS (#31247)
S.M. WESLEY (#73341)	J.R. BALDWIN (#78053)
M.E. PRENDERGAST (#88989)	J.E. VERTUS (#88658)
M.M. LANE JR (#88631)	H.T. SANDERS (#87392)
C.R. MORGAN (#83538)	K.R. CLARIDA (#68523)

Miscellaneous

Drug Activity: **NOT APPLICABLE** Drug Type: **NOT APPLICABLE** # of Reasons: **4**
of Victims: **0**
MCI Case: **NO** Follow-up By: # of Suspects: **0**
Was Hate Crime Involved?: **NO** Dating Violence Involved?: **NO** Is Offense(s) Related to Domestic Violence?: **NO**
If not Domestic Violence, Is it Domestic Related?: **NO** Any Children under 18 Involved as a Victim?: **NO**

NIBIN Leads

Report Reason

- #1 **INFORMATION REPORT**
- #2 **PROSTRAINT CHAIR**
- #3 **COMBATIVE INMATE (PHYSICAL)**
- #4 **MEDICAL EMERGENCY**

Subject #1 - FAGGART, CHARLES PATRICK

Demographics

Race: **WHITE** Sex: **MALE** Date of Birth: **09/03/1993**
Ethnicity: **NOT OF HISPANIC ORIGIN**
Primary Language: **English** Secondary Language: **NOT APPLICABLE**
Age: **31** Height (inches): **5'07"** Weight (lbs): **175**
Hair Style: **STRAIGHT** Hair Color: **BROWN** Hair Length: **SHORT**
Build: **MEDIUM** Eye Color: **BROWN** Facial Hair: **UNSHAVEN**
Complexion: **FAIR / LIGHT** Voice: **UNKNOWN**
Clothing/Description: **GREEN INMATE UNIFORM**
Place of Birth: **UNKNOWN, UNKNOWN, UNK** Place of Birth County: **UNK**
Nicknames:
Aliases:

Distinguishing Marks (Scars, Marks, and Tattoos)

Contact Information

Home Phone #: Bus. Phone #: Ext.: Alt. Phone #:
Cell Phone #: (904) 444-1096 Cell Phone Provider:
Email Address:

Primary Identification

Type of ID Given: STATE ID CARD ID: F263155933230 Issuing State: FLORIDA

Home Address

900 BERT RD # 150
JACKSONVILLE, FL 32211
Sub-sector: E4 TAZ: 324

Mailing Address

Alternate Address

Employment/School

Employer: UNK Occupation:
School Last Attended: NOT APPLICABLE

ECD Usage:

RTR Written Related to This Incident?: NO RTR Incident Year: RTR Incident #:
Drugs Involved?: YES Alcohol Involved?: NO Computer Involved?: NO

Related Reasons

- INFORMATION REPORT
PROSTRAINT CHAIR
COMBATIVE INMATE (PHYSICAL)
MEDICAL EMERGENCY

Life Saving Measures

Used?: YES Type: CPR Narcan Administered By: Narcan Outcome:

Additional Information

On 4/7/2025, I was assigned as the Close Supervision Officer in 6W-2A.

At approximately 0704 hours, Sergeant W. Cox #76320, Officer E. Kurtovic #84333, Officer J. Vertus #88658 and Officer M. Lane #88631 escorted Inmate Faggart, Charles #2025006925 into 6W-2A with the one-piece restraints behind his back. Inmate Faggart was displaying aggressive, erratic and disruptive behavior by thrashing his body, clenching his fist and pushing & pulling actions while attempting to escort into the dorm. Due to Inmate Faggart's behavior, Sergeant Cox deemed him a threat to himself, others & property and that he be placed in the Restraint Safety Chair. At this time, Inmate Faggart was seated in the Restraint Safety Chair with the lumbar support removed, but due to his increasingly aggressive behavior by kicking his feet and thrashing his body, was unable to be secured.

At approximately 0705 hours, due to Inmate Faggart's aggressive behavior, Sergeant Cox [REDACTED] F.S.119.071(2)(C)

At this time, Officer A. Maygoo #88643 arrived on scene to assist.

At approximately 0707 hours, Officer Kurtovic, Officer Vertus, Officer Maygoo and I attempted to secure Inmate Faggart in the Restraint Safety Chair, but he continued to thrash his body and kick his legs. Sergeant Cox [REDACTED] F.S.119.071(2)(C)

Inmate Faggart started to calm down. At this time, Officer J. Clifton #83565 arrived on scene with a spit-mask and placed it on Inmate Faggart and he was secured in the Restraint Safety Chair with the one-piece restraints still on by Officer Clifton, Officer Kurtovic and Officer Vertus under the direct supervision of Sergeant Cox. Sergeant Cox notified Lieutenant Wesley via his radio.

At approximately 0712 hours, Lieutenant S. Wesley #73341 arrived on scene.

At approximately 0724 hours, Mental Health Director Webb arrived on scene and began evaluating Inmate Faggart. Inmate Faggart verbalized to Mental Health Director Webb that he did fentanyl, she deemed him fit to be placed in self-harm housing and advised Sergeant Cox she would complete the paperwork.

At approximately 0728 hours, LPN Morris arrived on scene and began medically evaluating Inmate Faggart. LPN Morris flushed Inmate Faggart's eyes with saline solution and deemed him medically fit to remain in the Restraint Safety Chair.

At approximately 0839 hours, Mental Health Director Webb and RN Scott arrived on scene and began evaluating Inmate Faggart. During the evaluation, Inmate Faggart [REDACTED] F.S.119.071(2)(C)

At approximately 0842 hours, Sergeant K. Clarida #68524, Officer C. Morgan #83538, Officer P. Collins #88641, Officer M. Sullivan #84331, Officer J. Bullard #88012, Officer Kurtovic, Sergeant Cox and I arrived on scene. At this time, I removed the spit-mask off

Inmate Faggart.

At approximately 0843 hours, Officer J. Baldwin #78053, Recruit M. Prendergast #88989, Officer G. McKinnis #86574, Provider Lamier along with medical staff arrived on scene.

At approximately 0846 hours, Lieutenant L. Dickens #31247 arrived on scene.

At approximately 0848 hours, Provider Lamier [REDACTED] F.S.119.071(2)(C)

At approximately 0850 hours, Sergeant Cox deemed Inmate Faggart be removed from the Restraint Safety Chair [REDACTED] F.S.119.071(2)(C)

At Approximately 0851 hours, Officer Kurtovic, Officer Bullard, Officer D. Thomas #82590, Officer Collins, Officer Sullivan, and I removed Inmate Faggart from the Restraint Safety Chair. Once Inmate Faggart was removed from the Restraint Safety Chair, [REDACTED] Inmate Faggart was escorted to Cell #25 by Officer Kurtovic, Officer Collins, Officer Maygoo, Office Thomas, Officer Sullivan, Officer McKinnis and me under the direct supervision of Sergeant Cox. [REDACTED] F.S.119.071(2)(C)

[REDACTED]

[REDACTED] Sergeant Cox deemed it necessary for Inmate Faggart to be placed in the Restraint Safety Chair again for the safety of himself, others & property.

At approximately 0855 hours, as I was attempting to escort Inmate Faggart out of the cell, [REDACTED] F.S.119.071(2)(C) Officer Kurtovic, Officer Sullivan, Officer Bullard, Officer Thomas, Officer McKinnis, Officer Collins, Officer Maygoo and I placed him back in the Restraint Safety Chair under the supervision of Sergeant Cox. At this time, Sergeant Cox placed a spit-mask on Inmate Faggart.

At approximately 0857 hours, as Inmate Faggart was being placed in the Restraint Safety Chair, Officer Sullivan [REDACTED] F.S.119.071(2)(C)

At approximately 0900 hours, Lieutenant Wesley arrived on scene along with medical staff. [REDACTED] F.S.119.071(2)(C)

At approximately 0902 hours, Chief P. Restivo #5460 arrived on scene.

At approximately 0905 hours, Jacksonville Fire & Rescue Department #1 (JFRD) arrived on scene.

Incident (Information) 2025-0199183 (Continued)

At approximately 0910 hours, Inmate Faggart was placed on the stretcher by JFRD. JFRD installed the Lucas Compression Device to continue delivering chest compressions. JFRD departed the scene with Inmate Faggart to be transported to UF Health Shands.

No add-on charges were placed against Inmate Faggart.

A summary of the incident, along with the relevant C.C.R. number was updated in Inmate Faggart'S notes via A.T.I.M.S. by me. Be advised, I injured my right ankle during this incident. Sergeant Cox completed all appropriate Injury-On-Duty (I.O.D.) documentation.

Additional Question(s)

Body Worn Camera Footage

01 Is there Body Worn Camera (BWC) footage for incident?: **NO**

Risk Protection Order

01 Subject poses a significant danger of causing personal injury to himself/herself or others: **NO**

02 Subject owns, has care, custody or control of, or has the ability to purchase, possess, or receive firearm(s) and/or ammunition:

03 Subject was involved in a recent act or threat of violence against himself/herself or others, whether or not such violence involved a firearm:

04 Subject has made a threat of violence in the past 12 months against himself/herself or others:

05 Subject is seriously mentally ill or has recurring mental health issues:

06 Subject was a respondent of, or violated, a previous/existing injunction related to domestic, dating, sexual, or repeat violence and/or stalking:

07 The subject has previously been issued an RPO:

08 Subject has previously violated the provisions of an RPO:

09 Subject has been convicted of, had adjudication withheld on, or pled nolo contendere to, a crime constituting domestic violence in any state:

10 Subject has used, or threatened to use, against himself/herself or others, any weapons or physical force:

11 Subject has unlawfully or recklessly used, displayed, or brandished a firearm:

12 Subject has stalked another person:

13 Subject has been arrested for, convicted of, had adjudication withheld, or pled nolo contendere to a crime or threat of violence in any other state:

14 Is evidence to demonstrate the abuse of controlled substances or alcohol by the subject:

15 Is evidence to demonstrate the subject has recently acquired firearm(s) or ammunition:

16 Is there any other relevant information provided by a family/household member concerning the subject. (If yes, place information into the narrative):

Investigative Resource Use

1 Use of LPR assisted in investigation?: **NO**

2 Use of NIBN assisted in investigation?: **NO**

3 Use of RTCC assisted in investigation?: **NO**

Corrections Security Threat Group

01 STG/Gang related incident?: **NO**

02 Multiple assailants involved?: **NO**

03 Was a 36-Hour Lock Down initiated?: **NO**

04 Incident resulted in found contraband?: **NO**

05 Was a weapon used?: **NO**

06 Was an investigation into incident completed?:

07 Was the incident captured on surveillance camera?:

Misc Information

Clearance Status: **INFORMATION REPORT CLOSED**

Clearance Code: **NOT APPLICABLE** Date Case Was Cleared: **04/07/2025**

Number of Cases Cleared: **1**

Is there additional information included on a continuation report?: **NO**

Are there other Pertinent Reports?: **NO**

Did this incident qualify as a "Cargo Theft"?:

Is this a "TeleServ" report?: **NO**

Was victim provided options to obtain rights card?:

Option provided to victim?:

In your opinion is there significant reason to believe that the crime can be solved by a patrol follow-up investigation?:

Neighborhood Canvass Conducted?:

Case Card Information Left with: **NOT APPLICABLE**

Other Explanation:

Other Explanation Address:

N/A

Handouts

Bias Motivation(s)

Investigation Time #1

Hour(s): **05** Minute(s): **00** Cost Amount: **\$241.20**

Signature

Signature(s)

Reporting Officer #1:	T.C. PENNAMON (#88613)	Division:	JAILS	Section/Unit:	PDF HOUSING
Reporting Officer #2:	N/A	Division:		Section/Unit:	
Report submitted on:	04/07/2025 16:54	Status:	Approved		
Report Reviewer:	W.H. COX (#76320)				
Report approved on:	04/07/2025 16:55				

EXHIBIT 3



March 20, 2026

SENT VIA PORTAL, EMAIL, AND CERTIFIED MAIL

Jacksonville Sheriff's Office
Attn: Brandi Goff, Records Custodian
501 E. Bay St.
Jacksonville, FL 32202
jacksonvilleso@mycusthelp.net
brandi.goff@jaxsheriff.org

Re: Notice of Intent to Sue under Public Records Act, Reference # P459107-041425

Dear Ms. Goff:

Pursuant to Section 119.12(1)(b), Fla. Stat., you are hereby notified that that shortly after five business days from your receipt of this notice, we will file a civil action on behalf of our clients, the personal representatives of the Estate of Charles Faggart, against the Jacksonville Sheriff T.K. Waters and the Jacksonville Sheriff's Office to enforce the provisions of Chapter 119, Florida Statutes, for your agency's failure to provide the records requested by the undersigned, on behalf of the personal representatives and next of kin of Charles Faggart and his estate, which request was received by your agency on April 14, 2025. Specifically, this letter references request P459107-041425, in which we requested the attached records. While we have received certain records from you, your processing and response is incomplete, and those records that were produced were heavily redacted, obscuring relevant information, in violation of the Public Records Act and Florida Constitution.

Your agency's unreasonable delay and redaction of records violate section 119.01, Fla. Stat., requiring "reasonable public access" to responsive records. Accordingly, should we not receive *all* responsive records to our request and reproduction of records without redaction within the notice period, we will be forced, on behalf of our clients, to sue the sheriff and agency. We hope that you will reconsider.

Sincerely,
/s/ Belkis Plata
Belkis Plata, Esq

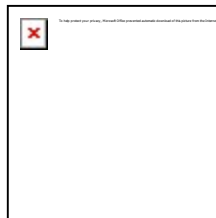
EXHIBIT 4

From: Belkis Plata <belkis@plataschott.com>
Sent: Wednesday, March 25, 2026 2:27 PM
To: James M. Slater; Shannon Schott; Michelle Muneton
Subject: Fwd: [Records Center]Public Records Request :: P509715-032026

Begin forwarded message:

From: JSO - GovQA <jacksonvilleso@mycusthelp.net>
Date: March 25, 2026 at 1:00:20 PM CDT
To: Belkis Plata <belkis@plataschott.com>
Subject: [Records Center]Public Records Request :: P509715-032026

--- Please respond above this line ---



RE: PUBLIC RECORDS REQUEST of March 20, 2026, Reference # P509715-032026

Dear Belkis,

Jacksonville Sheriff's Office received a public records request from you on March 20, 2026. You requested the following:

I am opening this new request because Reference No. P459107-041425 was closed out before the request was fully completed. We are unable to submit any additional message or correspondence through the original request, so please attach this new submission, along with the attached letter, to the original reference number.

To date, the response to the original request remains incomplete, and the records produced were heavily redacted. Please treat this submission as relating back to and supplementing Reference No. P459107-041425.

Please confirm that this new submission has been associated with the original request.

No other documents are releasable at this time due to the following:

The case you are requesting is an active Criminal Investigation as defined by FSS § 119.011(d)(2): "... criminal intelligence and criminal investigative information shall be considered "active" while such information is directly related to pending prosecutions or appeals". Therefore, pursuant to FSS § 119.071(c)1 [Active criminal intelligence information and active criminal investigative information are exempt from s. 119.07(1) and s. 24(a), Art. I of the State Constitution] this case is not available for dissemination. Once either Discovery has been made through the court, or a subpoena has been received for the requested information, complete information will be available for the defendant and /or their legal advisor.

If you have any questions, please contact my office at (904) 630-2209. Thank you for your attention.

Sincerely,

83966aes

Public Records

To monitor the progress or update this request please log into the [Public Records Center](#).