

DISTRICT COURT OF APPEAL OF FLORIDA
SECOND DISTRICT

App. A

AL-RASHID MUHAMMAD ABDULLAH,

Appellant,

v.

CITY OF PLANT CITY and SOUTHERN TOWING &
RECOVERY, INC.,

Appellees.

No. 2D2024-1730

June 27, 2025

Appeal from the Circuit Court for Hillsborough County; Nancy L. Jacobs,
Judge.

Al-Rashid Muhammad Abdullah, pro se.

Jay Daigneault of Trask Daigneault, LLP, Clearwater, for Appellee City of
Plant City.

No appearance for remaining Appellee.

PER CURIAM.

Affirmed.

VILLANTI, MORRIS, and LABRIT, JJ., Concur.

Opinion subject to revision prior to official publication.

**DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT**

1700 N. Tampa Street, Suite 300, Tampa FL 33602

App. B

July 31, 2025

AL-RASHID MUHAMMAD
ABDULLAH,
APPELLANT(S)
V.

CASE NO.: 2D2024-1730
L.T. No.: 16-CA-004970

CITY OF PLANT CITY AND
SOUTHERN TOWING &
RECOVERY, INC.
APPELLEE(S).

BY ORDER OF THE COURT:

Appellant's motion for rehearing, clarification, certification, and/or written opinion is denied.

I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

Mary Elizabeth Kuenzel
Mary Elizabeth Kuenzel, Clerk
11/20/24 17:00:00 2/21/25



MEP

Served:
AL-RASHID MUHAMMAD ABDULLAH
HILLSBOROUGH CLERK
JAY DAIGNEAULT

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION

APP. C

ABDULLAH, RASHID MUHAMMAD

Plaintiff,

CASE NO.: 16-CA-004970

v.

DIVISION: R

CITY OF PLANT CITY and SOUTHERN
TOWING & RECOVERY, INC.,

Defendants.

**ORDER ON DEFENDANT CITY OF PLANT CITY'S MOTION FOR SUMMARY
JUDGMENT AND PLAINTIFF RASHID MUHAMMAD ABDULLAH'S
RENEWED VERIFIED MOTION FOR COMPULSORY JUDICIAL NOTICE**

THIS CAUSE came on for hearing by Zoom on March 23, 2023 upon Defendant City of Plant City's Motion for Summary Judgment dated December 16, 2022 and Plaintiff's Renewed Motion for Judicial Notice dated October 17, 2022, and the Court, having heard the argument of counsel, and being otherwise fully advised in the premises, hereby **ORDERS AND**

ADJUDGES:

DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

1. Plaintiff's Verified Amended Complaint dated September 20, 2020 presents three claims against Defendant City of Plant City. Count I is for Specific Performance/Breach of Fiduciary Duty; Count II alleges that the Plaintiff is entitled to Replevin; and Count III alleges Conversion/Abuse of Process. For the reasons stated below, the Court dismisses Count I and III against Defendant City of Plant City.

2. The crux of Plaintiff's claims are that on May 10, 2016, his son received a citation for driving without a license and operating Plaintiff's 2000 Chevrolet Impala which was an unregistered, uninsured vehicle without a valid license plate. The vehicle was impounded by Co-Defendant Southern Towing & Recovery, Inc.
3. The Plaintiff alleges that he and his vehicle were both "implements of husbandry", exempt from state insurance and registration requirements:

¶19 Plaintiff proceeded with using his *'NOT for-hire' property (implement of husbandry)* temporarily operated or moved on a highway, in the lawful manner...in accordance with the statutes/codes; [see 322.04, Fla. Stat. Persons exempt from obtaining driver license- "(1) The following persons are exempt from obtaining a driver license: (b) *Any person while driving or operating any road machine, farm tractor, or implement of husbandry temporarily operated or moved on a highway.* " Also see 316.003(31), Fla. Stat. "(31) **IMPLEMENT OF HUSBANDRY**- Any vehicle designed and adapted exclusively for agricultural, horticultural, or livestock-raising operations or for lying or carrying an implement of husbandry and in either case not subject to registration used upon the highways. "(emphasis added).

4. Plaintiff also asserts that Florida Statutes §322.04(1)(b) exempts him from obtaining a driver's license. That statute provides as follows:

The following persons are exempt from obtaining a driver license... Any person while driving or operating any road machine, farm tractor, or implement of husbandry temporarily operated or moved on a highway.

5. The definition of "implement of husbandry" is defined by Florida Statutes

§316.003(30)(2013) as:

IMPLEMENT OF HUSBANDRY.—Any vehicle designed and adapted exclusively for agricultural, horticultural, or livestock-raising operations or for lifting or carrying an implement of husbandry and in either case not subject to registration if used upon the highways.

6. The Court finds that the Plaintiff has misread and misapplied the relevant Florida Statutes. The Plaintiff failed to register a common passenger vehicle that in no way was

“designed and adapted exclusively for lifting and carrying an implement of husbandry ...” Florida Statutes §316.003(30)(2013).

7. The Plaintiff mistakenly interprets instrument of husbandry to mean himself because he is a “manager of resources.” However, the plain language of the statute reflects that the term “implement of husbandry” is preceded by the phrase “agricultural, horticultural, or livestock-raising operations.” Florida Statutes §316.003(30)(2013). Plaintiff admits that he and his vehicle were not engaged in agricultural, horticultural, or livestock-raising operations at the time his son was given a citation.

8. The interpretation of a statute begins with the plain language contained within. As the Second District Court of Appeal has held:

“The first place we look when construing a statute is to its plain language—if the meaning of the statute is clear and unambiguous, we look no further.” In construing the statute's plain language, “words or phrases in a statute must be construed in accordance with their common and ordinary meaning.” and “phrases within a statute are not to be read in isolation, but rather should be construed within the context of the entire section.” *Lewars v. State*, 277 So. 3d 143, 145 (Fla. 2d DCA 2017)(internal citations omitted).

9. Taken in context, the plain language of the statute indicates that “implement of husbandry” does not mean human beings, as the Plaintiff contends, but instead refers to some tool or machinery used in furtherance of agricultural activities. Plaintiff's interpretation of “implement of husbandry” within the statute yields an absurd result. It would exempt every motor vehicle in the State of Florida operated by a human being from the registration requirements imposed by Chapter 320, Florida Statutes. See, Fla. Dep't of Highway Safety & Motor Vehicles v. Hernandez, 74 So. 3d 1070, 1079 (Fla. 2011) (statutes will not be interpreted to yield an absurd result); See also, Fla. Stat. 320.02(1)(“...every owner or person in charge of a motor vehicle that is operated or driven on the roads of this state shall register the vehicle in this state.”).

10. Florida Statutes §316.003(30)(2013) provides that the registration exemption only applies "...when the vehicle [is] designed and adapted exclusively for...lifting or carrying an implement of husbandry...". Plaintiff's own testimony establishes that his 2000 Chevrolet Impala is not a vehicle "designed and adapted exclusively" for these types of agricultural purposes.
11. This Court's findings and conclusions above dispense with Plaintiff's claims of specific performance/breach of fiduciary duty in Count I and of Conversion/Abuse of Process in Count III. The Court finds that no meritorious cause of action can be pled under these claims, and thus they are dismissed with prejudice.
12. Plaintiff's claim for Replevin in Count II may proceed.

**PLAINTIFF'S RENEWED VERIFIED MOTION FOR
COMPULSORY JUDICIAL NOTICE**

13. The Plaintiff requests that this court take judicial notice of numerous provisions of the Florida Constitution, the United States Constitution, Florida Statutes, Florida case law, criminal files, public policy, the Florida Evidence Code, and other statutes, codes and documents. After review of the parties' filings, the Court grants Plaintiff's Renewed Verified Motion for Compulsory Judicial Notice with respect to the United States Constitution and Florida Constitution.
14. The Plaintiff urges the Court to take judicial notice of the dismissals of certain traffic court cases. The Court grants that motion, but only to the extent that these traffic court cases are actually in the court file and that they are accurate. However, the Court denies Plaintiff's request to take judicial notice of the legal effect of the traffic court case dismissals, as there was no showing as to whether these dismissals were on the merits or

whether they resulted from other causes, such as the police officers failing to appear at the hearings.

Accordingly, it is hereby **ORDERED AND ADJUDGED:**

Defendant City of Plant City's Motion for Summary Judgment is granted in part, and denied in part. Counts I (Specific Performance/Breach of Fiduciary Duty) and Count III (Conversion/Abuse of Process) in Plaintiff's Verified Amended Complaint are **DISMISSED WITH PREJUDICE**. Defendant's Motion for Summary Judgment as to Count II (Replevin) is **DENIED**. Plaintiff's Renewed Motion for Compulsory Judicial Notice is granted in part and denied in part in accordance with the Court's rulings above.

DONE and ORDERED in Chambers, Plant City, Hillsborough County, Florida, on the 25
day of April 2023.

16-CA-004970 4/25/2023 9:58:06 AM
16-CA-004970 4/25/2023 9:58:06 AM

HONORABLE NANCY L. JACOBS
Circuit Court Judge

cc: Mr. Rashid Muhammed Abdullah

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION

App. D

ABDULLAH, RASHID MUHAMMAD

Plaintiff,

CASE NO.: 16-CA-004970

v.

DIVISION: R

CITY OF PLANT CITY and SOUTHERN
TOWING & RECOVERY, INC.,

Defendants.

ORDER ON MOTIONS HEARD ON MAY 14, 2024

These matters came on for hearing by Zoom on May 14, 2024, upon the parties' following motions:

1. Defendant's Motion for Summary Judgment on Count II of Plaintiff's Amended Complaint dated 9/20/23;
2. Plaintiff's Affidavit of Facts in Opposition to Defendant's Motion for Summary Judgment dated 2/5/24;
3. Plaintiff's Renewed Demand for Trial by Jury and Memorandum in Support of Claims and in Opposition to Defendant City of Plant City's Motion for Summary Judgment dated May 8, 2024.

FACTS

1. Plaintiff Rashid Abdullah filed his Verified Amended Complaint on September 20, 2020 alleging three claims against Defendant City of Plant City for Specific Performance/Breach of Fiduciary Duty; Replevin; and Conversion/Abuse of Process. By Order dated April 25, 2023, this court granted Defendant's Motion for Summary Judgment with respect to the Specific Performance/Breach of Fiduciary Duty as well as

Conversion/Abuse of Process, leaving only Plaintiff's claim for Replevin, which is the subject of this motion.

2. On May 10, 2016, Mr. Abdullah's son was driving the Plaintiff's 2000 Chevrolet Impala when it was stopped by the Plant City Police Department because it was an unregistered, uninsured vehicle without a valid license plate. The Plant City Police Department conducted an investigation and determined that there was probable cause to arrest Mr. Abdullah's son. They radioed Southern Towing and Recovery, Inc., which took possession of the vehicle and towed it to Southern Towing's property. Southern Towing and Recovery offered Mr. Abdullah the opportunity to recover his vehicle if he paid \$400 for the towing and storage fees, but Mr. Abdullah declined to do so. Ultimately, the vehicle was sold at auction.
3. Defendant City of Plant City motioned for Summary Judgment on Count II of Plaintiff's Amended Complaint.

LAW

4. Mr. Abdullah re-argues his claim that because his 2000 Chevrolet Impala was an "instrument of husbandry" pursuant to Florida Statutes §316.003(33)(2013), the Plant City Police had no legal right to arrest his son and impound his car. This court has already considered and rejected that argument in its Order dated April 25, 2023. The Plaintiff argued at the hearing that the Plant City Police Department had constructively possessed his vehicle at the arrest site, but the court finds that the Plant City officer's probable cause to make the stop and arrest, and that the Plant City police never took possession of the vehicle either actually or constructively. Therefore a right of Replevin cannot lie against the City. *See, Fla. Stat. 78.01* ("Any person whose personal property is wrongfully detained

by any other person or officer may have a writ of replevin to recover said personal property..."); *see also*, In re Bouchelle, 98 B.R. 81, 83 (Banker, M.D. Fla. 1989)(replevin is an action to recover possession of personal property and may be brought against persons in actual or constructive possession of such property).

5. On February 5, 2024, Plaintiff filed an Affidavit of Facts in in Opposition to Defendant City of Plant City's Motion for Summary Judgment. There he makes the same factual and legal arguments previously considered and rejected by this court. There are no relevant facts presented which would defeat Defendant's Summary Judgment motion.
6. On May 8, 2024, Mr. Abdullah filed a Renewed Demand for Trial by Jury and Memorandum in Support of Claims and in Opposition to Defendant City of Plant City's Motion for Summary Judgment. Although not set for hearing, the motion was heard and rejected by the court. The Plaintiff makes a renewed demand for trial by jury, but a review of his filed complaints revealed that he has never requested a jury trial in this matter, and thus that request has been waived. Additionally, the additional arguments in this pleading have already been made and rejected repeatedly by the court.

WHEREFORE the court having considered the pleadings and legal arguments made by the parties hereby **ORDERS** and **ADJUDGES**:

1. Defendant City of Plant City's Motion for Summary Judgment on Count II of Plaintiff's Amended Complaint dated 9/20/23 is **GRANTED**.
2. Plaintiff's Renewed Demand for Trial by Jury and Memorandum in Support of Claims and in Opposition to Defendant City of Plant City's Motion for Summary Judgment dated May 8, 2024 is **DENIED**.

3. Plaintiff's Affidavit of Facts in Opposition to Defendant's Motion for Summary Judgment dated 2/5/24 presents no facts or law that would preclude summary judgment in this action. Accordingly, Plaintiff's claim for Replevin against Defendant is **DISMISSED** with **PREJUDICE**.

31

DONE and **ORDERED** in Chambers, Plant City, Hillsborough County, Florida, on the _____ day of May 2024.

16-CA-004970 5/31/2024 7:27:07 AM

16-CA-004970 5/31/2024 7:27:07 AM

HONORABLE NANCY L. JACOBS
Circuit Court Judge

cc: Mr. Rashid Muhammed Abdullah

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION

App. E

ABDULLAH, RASHID MUHAMMAD

Plaintiff,

CASE NO.: 16-CA-004970

v.

DIVISION: R

CITY OF PLANT CITY and SOUTHERN
TOWING & RECOVERY, INC.,

Defendants.

**FINAL ORDER OF DISMISSAL OF PLAINTIFF'S CLAIMS
AGAINST DEFENDANT CITY OF PLANT CITY**

By virtue of this Court's Orders granting judgment on all claims pursued by the Plaintiff against Defendant City of Plant City, this Court hereby enters its Final Order of Dismissal of Plaintiff Rashid Muhammad Abdullah's claims against Defendant City of Plant City with prejudice, and Defendant City of Plant City may go hence without day.

31

DONE and ORDERED in Chambers, Plant City, Hillsborough County, Florida, on the _____ day of _____ May 2024.

16-CA-004970 5/31/2024 7:25:18 AM

16-CA-004970 5/31/2024 7:25:18 AM

HONORABLE NANCY L. JACOBS
Circuit Court Judge

cc: Mr. Rashid Muhammed Abdullah

Supreme Court of Florida

TUESDAY, SEPTEMBER 9, 2025

App. F

Al-Rashid Muhammad
Abdullah,

Petitioner(s)

v.

City of Plant City et al,
Respondent(s)

SC2025-1391

Lower Tribunal No(s).:

2D2024-1730;

292016CA004970A001HC

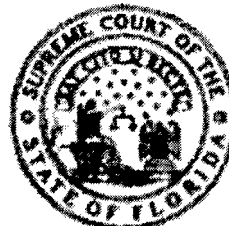
Petitioner's Notice to Invoke Discretionary Jurisdiction, seeking review of the order or opinion issued by the 2nd District Court of Appeal on June 27, 2025, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. See *Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846 So. 2d 1141 (Fla. 2003); *Stallworth v. Moore*, 827 So. 2d 974 (Fla. 2002); *Harrison v. Hyster Co.*, 515 So. 2d 1279 (Fla. 1987); *Dodi Publ'g Co. v. Editorial Am. S.A.*, 385 So. 2d 1369 (Fla. 1980); *Jenkins v. State*, 385 So. 2d 1356 (Fla. 1980).

No motion for rehearing or reinstatement will be entertained by the Court.

A True Copy
Test:

SC2025-1391 9/9/2025

John A. Tomasino
Clerk, Supreme Court



CASE NO.: SC2025-1391

Page Two

SC2025-1391 9/9/2025

TD

Served:

AL-RASHID MUHAMMAD ABDULLAH
2DCA CLERK
HILLSBOROUGH CLERK
JAY DAIGNEAULT
NANCY L JACOBS

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR HILLBOROUGH COUNTY

ABDULLAH, RASHID MUHAMMAD
Plaintiff;

App. G

CASE NO: 16-CA-004970

v.

CITY OF PLANT CITY and SOUTHERN TOWING
& RECOVERY, INC.,
Defendants.

DIVISION: R

FILED
2020 SEP 21 AM 11:30
CLERK COUNTY COURT
HILLBOROUGH COUNTY, FLA
PLANT CITY

VERIFIED AMENDED COMPLAINT

COMES NOW, *Al-Rashid Muhammad Abdullah* (herein 'Plaintiff'), being duly affirmed, declare and certify that the following information is true. Plaintiff HEREBY presents this Verified Amended Complaint to further clarify compliance with pleading standards for COUNTS One and Three, to better address the shortcomings claimed from the Initial Complaint and further request this Court to Redress the deprivations of Plaintiff's property Rights deemed '*negligence per se*', in violation of the '*Constitutions, statutes/codes, court rules and common/case law*' (herein '*Legal Authorities*'). Plaintiff's rights, privileges or immunities secured by the *Constitutions* of the United States and of the STATE OF FLORIDA (herein 'STATE'), HAS BEEN VIOLATED; as supported by any *code/statute or court rules providing for the EQUAL PROTECTION OF THE LAWS* guaranteed to ALL the People/persons within the jurisdiction of the United States or this STATE: The PUBLIC SERVANTS by 'verbal/written or printed communication' (*court process*, which includes seizures to issue *citations(process)*, herein 'Court'), continues to maliciously threaten an injury to Plaintiff's property and reputation, by accusing Plaintiff/Privy of repetitious accusations (crimes/offenses) on the same issues/claims, maliciously exposing Plaintiff to disgrace with intent to extort a pecuniary advantage or compel the Plaintiff/Privy to use my '*NOT for-hire*' property or refrain from using my property against the will of the Owner/Plaintiff, while concealing official records:

LIST OF AFFILIATED DEFENDANTS:

- CITY OF PLANT CITY DIRECTOR OF HUMAN RESOURCES – SANDERS BUSH (or the Successor pursuant to *Fla. R. Civ. P. 1.260(c)*)
- PLANT CITY POLICE DEPARTMENT (herein "PCPD") CHIEF – ED DUNCAN
- PCPD OFFICER (herein "PUBLIC SERVANT") – W. POLK
- PCPD OFFICER (herein "PUBLIC SERVANT") – BARRY C. MAURER
- PCPD OFFICER (herein "PUBLIC SERVANT") – JOSHUA M. SNYDER
- PCPD OFFICER (herein "PUBLIC SERVANT") – J. T. IVERSON

COUNT ONE: SPECIFIC PERFORMANCE/BREACH OF FIDUCIARY DUTY

In the Name of the Almighty, Plaintiff, *Al-Rashid Muhammad Abdullah*, a Civilian/Homesteader of Florida who presents this claim against the Defendants, some being PUBLIC SERVANTS employed with the CITY OF PLANT CITY (herein 'CITY'), and alleges:

1. This is an equitable/legal action for specific performance/breach of fiduciary duty *arising from legal authorities(written decisions on issues of law)*;
2. A duty of care is owed to Plaintiff specifically, created/supported by *legal authorities* concerning *final Judgments(Res Judicata)* of *Acquitted/Dismissed* criminal and civil accusations related to the certain property use issues/claims; [see *Amend. I, IV, V, VIII, IX, X & XIV, U.S. Const., Art. I, s. 1, 2, 3, 5, 9, 12, 16, 17 & 23, Fla. Const., 910.11, 92.05, 119.011(4 & 12), 112.311, 112.312(3, 8 & 9), 112.313(6), 876.05, 876.09, 838.14, 838.21, 838.022, 839.13, 839.24 & 836.05, Fla. Stat., Fla. R. Crim. P. 3.650 and Fla. R. Civ. P. 1.590*]
3. *Res Judicata is a procedural bar that prohibits relitigation of claims in a subsequent cause of action and includes claims that were raised or could have been raised in the prior action.*
4. The DEFENDANT, CITY OF PLANT CITY employees are PUBLIC SERVANTS in and for the STATE OF FLORIDA; [see *Art. II, s. 8, Fla. Const., 112.311, 112.313, 876.05, 876.09, 838.14 838.022, & 839.24, Fla. Stat.*]
5. PUBLIC SERVANTS are *agents of the people* holding their positions for the benefit of the public;
6. PUBLIC SERVANTS/agents are bound to uphold the *Constitution of the United States* and the *State Constitution*;
7. PUBLIC SERVANTS/fiduciaries are entrusted to perform efficiently and faithfully their duties under the *laws/legal authorities* of the federal, state, and local governments;
8. PUBLIC SERVANTS have a duty to account for actions/conduct taken under their powers prescribed by *legal authorities*.
9. Any activity/venture undertaken by the PUBLIC SERVANTS which *tends to weaken public confidence and undermine the sense of security for individual rights is against public policy.*
10. The Plaintiff, of the People of Florida *wholly depends on the Public Trust relationship* with the PUBLIC SERVANTS;
11. Plaintiff's dependency is particularly with the CRIMINAL JUSTICE AGENCY(herein 'CJA'), being "*any law enforcement agency, court, or prosecutor*" for protecting our interest in personal dignity, secured human rights, safety, or property as specified by their obligations imposed by *law/legal authorities*; [see *Art. II, s. 8, Fla. Const., 112.311, 112.313, 876.05, 876.09, 838.14 838.022, & 839.24, Fla. Stat.*]
12. On June 24, 2014, the Plaintiff received a **Judgment ORDER of ACQUITTAL** rendered and entered on the merits by a court of competent jurisdiction for CASE NO. 14-CT-074541, dismissing a criminal accusation of DR WHILE LIC SUSP(DWLS); a certified copy being attached as Exhibit 'A'(a public record deemed a constructive contract/TRUST); [see *92.05 & 119.011(12), Fla. Stat.*]

13. The STATE did NOT appeal the **Judgment ORDER of ACQUITTAL** rendered and entered on the merits by the Court;
14. After the judgment of ACQUITTAL became final, Plaintiff further reposed TRUST/confidence in the integrity and fidelity of the PUBLIC SERVANTS undertaking;
15. The **final judgment ORDER of ACQUITTAL** created a special relationship/duty between the Plaintiff and the Defendants, as PUBLIC SERVANTS of the STATE, particularly with the CJA(that includes the CITY'S Police Department(herein 'PCPD') officers patrolling the highways); [see **Amend. I, IV, V, VIII, IX, X & XIV, U.S. Const., Art. I, s. 1, 2, 3, 5, 9, 12, 16, 17 & 23, Fla. Const., 910.11, 92.05, 119.011(4 & 12), 112.311, 112.312(3, 8 & 9), 112.313(6), 876.05, 876.09, 838.14, 838.21, 838.022, 839.13, 839.24 & 836.05, Fla. Stat., Fla. R. Crim. P. 3.650 and Fla. R. Civ. P. 1.590]**
16. **Double Jeopardy** applies to criminal DWLS cases rendered on the merits with the ACQUITTAL/DISMISSAL granted for lack of evidence in the county Court;
17. The constitutional rule is that jeopardy attaches in trials before a judge without a jury, when the first witness swears in or the first evidence is presented;
18. Once jeopardy attaches, **a dismissal granted by the court for insufficient evidence terminates jeopardy and bars further prosecution on the same matter(s);**
19. Plaintiff proceeded with using his '**NOT for-hire**' property(implement of husbandry) temporarily operated or moved on a highway, in the lawful manner as expressed within the merits of the abovementioned case where the Court adopted Plaintiff's view of law as being in accordance with the statutes/codes; [see **322.04, Fla. Stat. Persons exempt from obtaining driver license.— "(1) The following persons are exempt from obtaining a driver license: (b) Any person while driving or operating any road machine, farm tractor, or implement of husbandry temporarily operated or moved on a highway."** Also see **316.003(31), Fla. Stat. "(31) IMPLEMENT OF HUSBANDRY.— Any vehicle designed and adapted exclusively for agricultural, horticultural, or livestock-raising operations or for lifting or carrying an implement of husbandry and in either case not subject to registration if used upon the highways."**]
20. On 06/17/2015, there was an occurrence/endangerment where a law enforcement agent for the PCPD made accusations concerning this '**NOT for-hire**' property usage as tagged; [see **90.902(7), Fla. Stat.** and **CASE NO. 15-TR-077179, OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO** and **15-TR-077180, FAILURE OF EACH PARTY TO PROVIDE PROOF OF INS;** both **DISMISSED** on 08/04/2015]
21. Plaintiff's TRUST/confidence in the PUBLIC SERVANTS was surely enhanced after another Judge adopted Plaintiff's view of law concerning his '**NOT for-hire**' property usage indicated by the ACQUITTALS/DISMISSALS on 08/04/2015;
22. Plaintiff/Privies further proceeded with using '**NOT for-hire**' property(implement of husbandry) as tagged, in the lawful manner as expressed within the merits of the abovementioned three cases;

23. Plaintiff's property use is now acknowledged by two different Judges of this Circuit Court *adopting Plaintiff's view of law* with their judgments of *ACQUITTAL/DISMISSAL* on 06/24/2014 and 08/04/2015.
24. On several other dates, the various PCPD officers breached their duty/TRUST by making *per se unreasonable seizures* of my property according to the *legal authorities* mentioned herein, each with a group of officers to make the criminal and civil accusations *DISMISSED/ACQUITTED* on the exact same property use claims/issues with intent to compel Plaintiff to use his '*NOT for-hire*' property or refrain from using his property against Plaintiff's will; leading to the detaining/taking of my property on 05/10/2016, also *DISMISSED/ACQUITTED* as follows:
- a. On 06/29/2015 JOSHUA M. SNYDER, *CASE NO. 15-CT-015126, NO MOTOR VEH REG – DISMISSED* on 08/04/2015;
 - b. On 11/13/2015 PAUL K. TESTER, *CASE NO. 15-TR-138682, OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO – DISMISSED* on 02/02/2016;
 - c. On 03/11/2016 DENNIS S. PAWLOWSKI, *CASE NO. 16-TR-031005, OPER NONCMV NOT PROPERLY INSURED/PROOF OF INS REQ – DISMISSED* on 05/10/2016; [Issued two citations(*A5DEWME* & *A5DEWNE*), but **ONLY** filed **one(*A5DEWNE*) with the Court** since the PCPD acknowledged the other citation's (*A5DEWME*) issue of *OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO – was barred* due to the prior *ACQUITTALS/DISMISSALS*]
 - d. On 04/29/2016 J. T. IVERSON, *CASE NO. 16-CT-009406 & 16-TR-051515, OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO (SUBSEQUENT OFFENSES; as noted on Court docket)* and *TAG NONE/OBSCUR/DEFACED/IMPROP DISPLAY – both DISMISSED* on 05/17/2016;
 - e. On 05/10/2016 W. POLK along with BARRY MAURER, *CASE NO. 16-CT-009773 & 16-CT-009774, OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO (SUBSEQUENT OFFENSES; as noted on Court docket)* and *ATTACHING TAG NOT ASSIGNED – both DISMISSED* on 05/17/2016;
25. At the time of each endangerment/threat described by the injurious/malicious *seizures leading to the taking of Plaintiff's property* by the certain PCPD officers, the officers' actions indicate a specific intent to directly harm/distress the Plaintiff being that Plaintiff is the actual Owner of the '*NOT for-hire*' property;
26. The abovementioned *per se unreasonable seizures* are in violation of the *Constitutions*, which indicates a *breach of the public TRUST* according to the supportive *statutes/codes or courts rule or case law*; [see *Amend. I, IV, V, VIII, IX, X & XIV, U.S. Const., Art. I, s. 1, 2, 3, 5, 9, 12, 16, 17 & 23, Fla. Const., 910.11, 92.05, 119.011(4 & 12), 112.311, 112.312(3, 8 & 9), 112.313(6), 876.05, 876.09, 838.14, 838.21, 838.022, 839.13, 839.24 & 836.05, Fla. Stat., Fla. R. Crim. P. 3.650 and Fla. R. Civ. P. 1.590*]

27. Plaintiff is surely dependent on the PUBLIC SERVANTS undertaking to protect against any conflicts of interest on the matter, especially following *ACQUITTAL(S)* concerning Plaintiff's continued '*NOT for-hire*' property use acknowledged by the Court;
28. Plaintiff had a legitimate expectation of the *finality of judgments*, to continue 'the ACT or omission deemed non-criminal' by the *ACQUITTALS/DISMISSALS*;
29. The Court indicated the *ACQUITTAL/DISMISSAL* judgments were based on the lack of relevant evidence for at least one of the factual elements of the criminal/civil offenses charged. [See *Exhibit 'A'*, a certified copy of the judgment ORDER]
30. The Court/Defendants admitted that there was 'no temporal break in Plaintiff's performed '*NOT for-hire*' property use [*ACQUITTED* conduct] nor a change in circumstances' by the various accusations of the PCPD officers about the exact same certain property usage all being *DISMISSED/ACQUITTED* by the Court;
31. The acknowledgement by two different Judges of this Circuit Court *adopting Plaintiff's view of law* is sufficient to establish a duty with the PUBLIC SERVANTS, specifically with the CJA/PCPD officers, to prevent the repeated acts of arresting/seizing my property for the exact same issues by the PCPD officers making criminal and civil accusations SOLELY for seeing the continued property use with the property tagged '*NOT for-hire*'.
32. After the *negligence per se seizure* of my property on 03/11/2016 described above made by the group of PCPD officers, Plaintiff filed an online Risk Management Complaint on 04/01/2016 with the CITY about the said breach of the public TRUST/Fiduciary Duty; [see *Attachment# 1* presented to the Court with *Affidavit of Truth to Support Claim*. Also see *Amend. I, IV, V, VIII, IX, X & XIV, U.S. Const., Art. I, s. 1, 2, 3, 5, 9, 12, 16, 17 & 23, Fla. Const., 910.11, 92.05, 119.011(4 & 12), 112.311, 112.312(3, 8 & 9), 112.313(6), 876.05, 876.09, 838.14, 838.21, 838.022, 839.13, 839.24 & 836.05, Fla. Stat., Fla. R. Crim. P. 3.650 and Fla. R. Civ. P. 1.590]*
33. On 03/11/2016 the PCPD officer actually issued two citations(*A5DEWME & A5DEWNE*), but ONLY filed one(*A5DEWNE*) with the Court, possibly since the Chief of PCPD advised or the officers acknowledged, that the other citation's(*A5DEWME*) issue/claim of *OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO* was precluded/estopped supported by legal authorities;
34. The PCPD Chief/officers expressed clear knowledge of the matter by NOT filing the citation(*A5DEWME*) with the Court for the issue/claim of *OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO*, after actually issuing the citation;
35. Following the Risk Management Complaint, another *negligence per se seizure(wrongful ACT/CONDUCT)* of depriving Plaintiff the enjoyment to use/posses his '*NOT for-hire*' property occurred on 04/29/2016 by the PCPD officers enhancing the claims to criminal accusations, appearing to be a retaliatory seizure about the Complaint;
36. Around 05/02/2016, Plaintiff presented a '*Notice of Intent to File Claim*' to the PUBLIC SERVANTS as required by 768.28, *Fla. Stat.*, following the retaliatory *negligence per se*

seizure of my property by a group of PCPD officers that occurred on 04/29/2016; [see Attachment# 2 presented to the Court with Affidavit of Truth to Support Claim]

37. The CITY/Chief of PCPD neglected to investigate presented notices or train/inform the police officers of their *standard duty of care* as set by the *legal authorities*, especially concerning the Plaintiff's lawful '*NOT for-hire*' property use acknowledged by the Court;
38. The CITY/Chief of PCPD neglected to institute necessary remedial discipline for the PUBLIC SERVANTS/officers on the notified matters to prevent further harm/distress to Plaintiff, especially after the several *ACQUITTALS/DISMISSALS*;
39. The CITY/Chief of PCPD neglected to prevent the outrageous *per se unreasonable seizures/arrests* of my '*NOT for-hire*' property by the PCPD officers depriving Plaintiff/Privies of the enjoyment of the '*NOT for-hire*' property as tagged; [see *Amend. I, IV, V, VIII, IX, X & XIV, U.S. Const., Art. I, s. 1, 2, 3, 5, 9, 12, 16, 17 & 23, Fla. Const., 910.11, 90.902(7), 92.05, 119.011(4 & 12), 112.311, 112.312(3, 8 & 9), 112.313(6), 876.05, 876.09, 838.14, 838.21, 838.022, 839.13, 839.24 & 836.05, Fla. Stat., Fla. R. Crim. P. 3.650 and Fla. R. Civ. P. 1.590*]
40. The several PUBLIC SERVANTS involved with this matter are affiliated in the collusion to *falsify or avoid ACQUITTAL/DISMISSAL records* including the certified copy of the judgment ORDER filed in the affiliated judicial proceedings mentioned herein;
41. The several PUBLIC SERVANTS involved with this matter are knowingly and willingly colluding to discharge(cancel court ORDER(S)) or conceal the '*already resolved ISSUE/CLAIM*' concerning Plaintiff's lawful '*NOT for-hire*' property use as acknowledged by the Court;
42. Subsequent to the two abovementioned NOTICES to the CITY, the PCPD officers further enhanced their harassments with another *negligence per se seizure* of my '*NOT for-hire*' property with a group of officers to make criminal accusations and this time the *taking of my property as further retaliation on 05/10/2016*, being the same day the accusations from 03/11/2016(CASE NO. 16-TR-031005) was *DISMISSED*;
43. Particularly after the occurrence/threat on 03/11/2016, the PCPD Chief/officers' choice **NOT to file the citation(A5DEWME) with the Court**, clearly expressed their actual knowledge of the wrongfulness of their conduct to repeatedly seize Plaintiff's property for the same *DISMISSED/ACQUITTED* or confirmed '*NOT for-hire*' property usage as *tagged*, being acknowledged by the Court by two different Judges;
44. This expressed knowledge by the PCPD Chief/officers' choice of **NOT filing the citation(A5DEWME) with the Court** verifies their awareness of the high probability that injury or damage to the Plaintiff would result from their conduct to continuously seize or take Plaintiff's property concerning the matter specified with the *discarded citation*;
45. In despite of the PUBLIC SERVANTS knowledge of wrongfulness, they intentionally pursued with depriving Plaintiff of exercising his property right to enjoy possession/usage by continuously seizing then the retaliatory taking of Plaintiff's property on 05/10/2016, resulting in injury or damage to Plaintiff as a direct result;

46. The PCPD officer's conduct is so reckless or wanting in care that it constitutes a conscious disregard or indifference to the life, safety, or rights of Plaintiff/Privies exposed to such conduct;
47. The CITY/Chief of PCPD actively and knowingly participated in such conduct by their omissions whereas they were NOTIFIED of the matter(s) upon each occurrence/endangerment;
48. The CITY/Chief of PCPD knowingly condoned, ratified, or consented to such conduct expressed by their failure to prevent even after being NOTIFIED of the matter(s);
49. The CITY/Chief of PCPD failures to act, especially after the several NOTICES including the *ACQUITTALS/DISMISSALS*, was so reckless or wanting in care that it constituted a conscious disregard or indifference to the life, safety, or rights of the Plaintiff/Privies exposed to such conduct;
50. The CITY/Chief of PCPD could have used reasonable diligence to prevent the wrongful act(s) from being committed by the PCPD officers;
51. The CITY/Chief of PCPD neglecting or refusing to use their powers to prevent the ACTS/CONDUCT leading to the taking of Plaintiff's property, especially after the several NOTICES including the *ACQUITTALS/DISMISSALS*, contributed to the loss or damages suffered by the Plaintiff which includes the loss of consortium.
52. After the taking of my property on 05/10/2016, followed by the Court promptly dismissing the *SUBSEQUENT OFFENSES*(as noted by the Court docket) for case #'s 16-CT-009773 & 16-CT-009774 on 05/17/2016, the PCPD refused to return my property at no cost to Plaintiff as requested to Redress/Remedy the matter, which includes returning the 'NOT for-hire' TAG that was snatched off or damaged during the taking;
53. As the CITY/PCPD refuses to issue the requested documentation for the tow company to release/return my property at no cost, along with the tow company not being open or available during business hours for Plaintiff to even pay for the return of the property, the initial Complaint for Redress of Grievances followed as a direct response/counterclaim to such malicious conduct. [See 768.28(6)(d) & 768.14, Fla. Stat.];
54. According to the *legal authorities* expressed herein, *jeopardy* did attach with each criminal accusation then was terminated by the judgment(s) on the merits, indicating the lack of evidence/probable cause; [see *Amend. I, IV, V, VIII, IX, X & XIV, U.S. Const., Art. I, s. 1, 2, 3, 5, 9, 12, 16, 17 & 23, Fla. Const., 910.11, 92.05, 119.011(4 & 12), 112.311, 112.312(3, 8 & 9), 112.313(6), 876.05, 876.09, 838.14, 838.21, 838.022, 839.13, 839.24 & 836.05, Fla. Stat., Fla. R. Crim. P. 3.650 and Fla. R. Civ. P. 1.590*]
55. The PUBLIC SERVANTS failure to acknowledge *legal authorities* based on the principles of *Double Jeopardy, Collateral Estoppel known as Issue/Claim Preclusion or Res Judicata* to justify continuously seizing then taking Plaintiff's property are deemed *negligence per se* violations supported by the *legal authorities* expressed herein;

56. Monetary damages alone are insufficient to Remedy/Redress the grievances for the BREACH or abuse of the public TRUST to restore Plaintiff's deprived/abridged fundamental Right of **EQUAL PROTECTION OF THE LAWS** combined with the threats on my Rights of Life, Liberty and the Pursuit of Happiness to be restored.

57. The PUBLIC SERVANTS acts/omissions(Specific Performance) described herein are in breach of their Fiduciary duty causing harm/distress to Plaintiff as a direct result of each BREACH or abuse of the public TRUST described by the *per se unreasonable seizures* leading to the arrest/taking of my property for their benefit at Plaintiff's expense;

WHEREFORE Plaintiff prays and demands the Court issue a Judgment awarding him compensatory and punitive damages at the sum of *Three Million(\$3,000,000) NOTES as a settlement* to Redress the Grievances *since the deprived Human Rights are actually PRICELESS*, including Plaintiff's reasonable costs, including investigative expenses, and attorney's fees; also Plaintiff prays and demands that Defendants be prosecuted for the criminal violations presumed committed according to the *legal authorities* expressed herein, together with such other and further relief as the Court may deem reasonable and just under the circumstances. ***So Help Me God!!! Amen.***

COUNT TWO: REPLEVIN

[SEE INITIAL COMPLAINT]

WHEREFORE Plaintiff prays and demands the Court issue a Judgment awarding him compensatory and punitive damages; and for Defendant, the CITY to replace my property with a new vehicle of the same make/model as taken or the funds at the sum of \$30,000 to purchase such plus damages at the sum of *Three Million(\$3,000,000) NOTES, as a settlement* to Redress the Grievances *since the deprived Human Rights are actually PRICELESS*; whereas the TOW COMPANY appears to be *out of business*, which prevents judgment for possession of the actual property taken, which includes the other valuable property left within the vehicle taken from Plaintiff, including reasonable costs, including investigative expenses, and attorney's fees; also Plaintiff prays and demands that Defendants be prosecuted for the criminal violations presumed committed according to the *legal authorities* expressed herein, together with such other and further relief as the Court may deem reasonable and just under the circumstances. ***So Help Me God!!! Amen.***

COUNT THREE: CONVERSION/ABUSE OF PROCESS

In the Name of the Almighty, Plaintiff, **Al-Rashid Muhammad Abdullah**, a Civilian/Homesteader of Florida who presents this claim against the Defendants, being PUBLIC SERVANTS of the CITY OF PLANT CITY, [see **768.14 & 768.28, Fla. Stat.**] and alleges:

1. This is an equitable/legal action *for damages that exceed the sum of Fifteen thousand dollars.*
2. At the time of the injuries, Plaintiff was the Owner of tangible property under a certificated security, date of issue is 09/23/2011, and a copy of the certificate of title was attached to the initial Complaint.
3. On June 24, 2014, the Plaintiff received a **Judgment ORDER of ACQUITTAL** rendered *and entered on the merits* by a court of competent jurisdiction for **CASE NO. 14-CT-**

074541, dismissing a criminal accusation of *DR WHILE LIC SUSP(DWLS)*; a certified copy being attached as *Exhibit 'A'* (a public record deemed a constructive contract/TRUST); [See 92.05 & 119.011(12), Fla. Stat.]

4. The STATE did NOT appeal the *Judgment ORDER of ACQUITTAL* rendered and entered on the merits by the Court;
5. The *final judgment ORDER of ACQUITTAL* created a special relationship/duty between the Plaintiff and the Defendants, as PUBLIC SERVANTS with the STATE, particularly with the CJA(that includes the CITY'S Police Department(herein 'PCPD')) *officers patrolling the highways*; [See *Amend. I, IV, V, VIII, IX, X & XIV, U.S. Const., Art. I, s. 1, 2, 3, 5, 9, 12, 16, 17 & 23, Fla. Const., 910.11, 92.05, 119.011(4 & 12), 112.311, 112.312(3, 8 & 9), 112.313(6), 876.05, 876.09, 838.14, 838.21, 838.022, 839.13, 839.24 & 836.05, Fla. Stat., Fla. R. Crim. P. 3.650 and Fla. R. Civ. P. 1.590*]
6. On 06/17/2015, there was an occurrence where a law enforcement agent for the PCPD made accusations concerning Plaintiff's '*NOT for-hire*' *property usage as tagged*; [see 90.902(7), Fla. Stat. and CASE NO. 15-TR-077179, OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO and 15-TR-077180, FAILURE OF EACH PARTY TO PROVIDE PROOF OF INS; both DISMISSED on 08/04/2015]
7. Plaintiff/Privies further proceeded with using '*NOT for-hire*' *property(implement of husbandry) as tagged*, in the lawful manner as expressed within the merits of the abovementioned three cases;
8. Plaintiff's property use is now acknowledged by two different Judges of this Circuit Court *adopting Plaintiff's view of law* with their judgments of *ACQUITTAL/DISMISSAL* on 06/24/2014 and 08/04/2015.
9. The Court indicated the *ACQUITTALS/DISMISSALS* were based on the lack of relevant evidence for at least one of the factual elements of the criminal/civil offenses charged. [See *Exhibit 'A'*, a certified copy of the judgment ORDER]
10. The acknowledgement by two different Judges of this Circuit Court *adopting Plaintiff's view of law* is sufficient to establish a duty with the PUBLIC SERVANTS, specifically with the CJA/PCPD officers, to prevent the repeated acts of seizing my property for the exact same issues by the PCPD officers making criminal and civil accusations SOLELY for seeing the continued property use with the property tagged '*NOT for-hire*'.
11. The several malicious seizures of Plaintiff's '*NOT for-hire*' property resulting the *DISMISSED/ACQUITTED* accusations that eventually lead to the taking of Plaintiff's property by the PCPD officers on 05/10/2016, is evidence of their intent to convert Plaintiff's exercise of his Right to enjoy the use/possession of tangible personal property into a crime, with intent thereby to extort money from the Owner/Plaintiff;
12. The PCPD officers repeatedly made *per se unreasonable seizures* leading to the taking of Plaintiff's property which deprived Plaintiff as the Owner of the tangible personal property, the enjoyment to use/possess his property as a direct result;

13. On the following listed dates, harm/distress was caused to Plaintiff by each *per se unreasonable seizure* leading to the retaliatory taking of Plaintiff's property with malicious claims made by the PCPD officers around 05/10/2016, which indicates the PCPD officers are using the Court for the purpose of compelling Plaintiff to live in a continuing state of anxiety and insecurity, therefore depriving Plaintiff from enjoying his expressed lawful '*NOT for-hire*' *property usage* acknowledged by this Circuit Court are as follows:
- a. On 06/29/2015 JOSHUA M. SNYDER, CASE NO. 15-CT-015126, NO MOTOR VEH REG – DISMISSED on 08/04/2015;
 - b. On 11/13/2015 PAUL K. TESTER, CASE NO. 15-TR-138682, OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO – DISMISSED on 02/02/2016;
 - c. On 03/11/2016 DENNIS S. PAWLOWSKI, CASE NO. 16-TR-031005, OPER NONCMV NOT PROPERLY INSURED/PROOF OF INS REQ – DISMISSED on 05/10/2016; [Issued two citations(A5DEWME & A5DEWNE), **but ONLY filed one(A5DEWNE) with the Court** since the PCPD acknowledged the other citation's (A5DEWME) issue of OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO – was barred due to the prior ACQUITTALS/DISMISSALS]
 - d. On 04/29/2016 J. T. IVERSON, CASE NO. 16-CT-009406 & 16-TR-051515, OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO (**SUBSEQUENT OFFENSES; as noted on Court docket**) and TAG NONE/OBSCUR/DEFACED/IMPROP DISPLAY – both DISMISSED on 05/17/2016;
 - a. On 05/10/2016 W. POLK along with BARRY MAURER, CASE NO. 16-CT-009773 & 16-CT-009774, OPER MV/MOBL HOM W/EXP REG MORE THAN 6 MO (**SUBSEQUENT OFFENSES; as noted on Court docket**) and ATTACHING TAG NOT ASSIGNED – both DISMISSED on 05/17/2016;
14. Plaintiff's right to enjoy possession/use of tangible personal property was deprived temporarily by the PCPD officers blatantly arresting/seizing my property, using the Court for obtaining nonconsensual compliance to economic regulations on the property inconsistent with Plaintiff's ownership interest in the property;
15. Plaintiff's *fundamental property Right to enjoy the use/possession of tangible personal property is actually PRICELESS*, therefore as a settlement, the deprived Human Right is valued at \$1,000,000 per conversion plus \$100,000 per person/agent or \$3,000,000 per conversions per agency/departments plus \$100,000 per person/agent;
16. Plaintiff's right to enjoy possession/use of tangible personal property was deprived temporarily with the repeated seizures on various abovementioned dates then permanently with the retaliatory taking of my property on 05/10/2016;
17. The deprivations of Plaintiff's Human Right to be the rightful/lawful Owner enjoying the possession/use of his property is without consent;

18. The deprivations are inconsistent with Plaintiff's ownership interest in the property;
19. Plaintiff's repeated demands for return of property was futile as Defendant's refused to issue documentation to return property at no cost to Plaintiff once the claims/issues were promptly *DISMISSED* 05/17/2016;
20. The *per se unreasonable seizure* then the taking of Plaintiff's property on 05/10/2016 was specified as *SUBSEQUENT OFFENSES(as noted on the Court docket)*, being *DISMISSED/ACQUITTED* promptly by the Court on 05/17/2016 as the claim(s) lacked evidence/probable cause.
21. Particularly after the occurrence/threat on 03/11/2016, the PCPD Chief/officers' choice **NOT to file the citation(A5DEWME) with the Court**, clearly expressed their actual knowledge of the wrongfulness of their conduct to repeatedly seize then take Plaintiff's property for the same *DISMISSED/ACQUITTED* or confirmed '*NOT for-hire*' property usage as tagged, being acknowledged by the Court by two different Judges;
22. This expressed knowledge by the PCPD Chief/officers' choice of **NOT filing the citation(A5DEWME) with the Court** verifies their awareness of the high probability that injury or damage to the Plaintiff would result from their conduct to continuously seize or take Plaintiff's property concerning the matter specified with the *discarded citation*;
23. In despite of the PUBLIC SERVANTS knowledge of wrongfulness, they intentionally pursued with depriving Plaintiff of exercising his property right to enjoy possession/usage by continuously seizing, then the retaliatory taking of Plaintiff's property on 05/10/2016, resulting in injury or damage to Plaintiff as a direct result;
24. The PCPD officer's conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the life, safety, or rights of the Plaintiff/Privies exposed to such malicious conduct;
25. The CITY/Chief of PCPD actively and knowingly participated in such conduct by their omissions whereas they were NOTIFIED of the matter(s) upon each occurrence/threat;
26. The CITY/Chief of PCPD knowingly condoned, ratified, or consented to such conduct expressed by their failure to prevent even after being NOTIFIED of the matter(s);
27. The CITY/Chief of PCPD failures to act, especially after the several NOTICES including the *ACQUITTALS/DISMISSALS*, was so reckless or wanting in care that it constituted a conscious disregard or indifference to the life, safety, or rights of the Plaintiff/Privies exposed to such conduct;
28. The CITY/Chief of PCPD could have used reasonable diligence to prevent the wrongful act(s) from being committed by the PCPD officers;
29. The CITY/Chief of PCPD neglect or refusal to use their powers to prevent the ACTS/CONDUCT leading to the taking of Plaintiff's property, especially after the several NOTICES including the *ACQUITTALS/DISMISSALS*, contributed to the loss or damages suffered by the Plaintiff which includes the loss of consortium;

30. At the time of each endangerment/threat described by the injurious/malicious *seizures leading to the taking of Plaintiff's property* by the certain PCPD officers, the officers' actions indicate a specific intent to directly harm/distress the Plaintiff being that Plaintiff is the actual Owner of the 'NOT for-hire' property;
31. The seizures leading to the retaliatory taking of Plaintiff's property as the evidence shows that Plaintiff is/was the rightful/lawful Owner validates that the Defendant's conduct did in fact harm/distress the Plaintiff as a direct result;
32. Plaintiff suffered damages as a direct and proximate result of each threatened/wrongful act made with the seizures leading to the taking of my property;

WHEREFORE Plaintiff prays and demands the Court issue a Judgment awarding him compensatory and punitive damages at the sum of *Three Million(\$3,000,000) NOTES as a settlement* to Redress the Grievances *since the converted Human Rights are actually PRICELESS*, including Plaintiff's reasonable costs, including investigative expenses, and attorney's fees; also Plaintiff prays and demands that Defendants be prosecuted for the criminal violations presumed committed according to the *legal authorities* expressed herein, together with such other and further relief as the Court may deem reasonable and just under the circumstances. ***So Help Me God!!! Amen.***

Hibu(Love), Haqq(Truth), Salaam(Peace), Hurryatun(Freedom), Adl(Justice):

This said Notice to Principal is a Notice to Agent; and Notice to Agent is Notice to Principal.

I declare UNDER PENALTY OF PERJURY under the laws of the United States of America, that I have read the foregoing document and that the facts stated in it are true, to the best of my knowledge, belief and honorable intent. [28 USC §1746; 92.525(2), Fla. Stat.] ***So Help Me God!!! Amen.***

Date: 20 Sept 2020

BismiAllah By: 

Al-Rashid Muhammad Ibn Bilal Abdullah, In Full Life
ALL RIGHTS RESERVED – WITHOUT PREJUDICE – NON ASSUMPSIT;
c/o 808 West Madison Street, non-domestic near Plant City [33563]
Florida Republic, Turtle Island

IN THE NAME OF THE ALMIGHTY!!!

CERTIFICATE OF SERVICE and ACKNOWLEDGEMENT

We HEREBY CERTIFY that a true and correct copy of the following listed documents will be furnished by **hand delivery to: CLERK OF THE CIRCUIT COURT – Pat Frank or Assigns**, 301 North Michigan Ave., Plant City, Florida 33563 and a copy furnished electronically by **e-mail delivery to: CITY OF PLANT CITY – Attorney Thomas P. Scarritt, Jr., tps@scarrittlaw.com or courtpleadings@scarrittlaw.com**, 1405 West Swann Avenue, Tampa, Florida 33606.

Item Number:	Document Description:	Number of Leaves(pages):
0	<i>Verified Amended Complaint</i>	12
1	<i>Exhibit 'A'; a certified copy of the judgment ORDER</i>	1

IN THE CIRCUIT COURT
IN AND FOR HILLSBOROUGH COUNTY,
STATE OF FLORIDA TRAFFIC DIVISION

Exhibit 'A'

CITATION NO: A18WWHP
Re: RASHID MUHAMMAD ABDULLAH
AGENCY NAME: TAMPA POLICE DEPARTMENT
Issuance Date: 05/04/2014

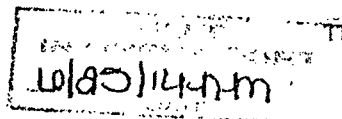
ORDER ON MOTION TO DISMISS

THIS CAUSE having come before the court, and the court having heard evidence and argument of the Parties, now therefore it is hereby:

ORDERED AND ADJUDGED that

1. The Motion to Dismiss is hereby GRANTED.
2. **There was no evidence produced to sufficiently prove beyond a reasonable doubt that the Accused was driving or operating a MOTOR VEHICLE (Vehicle used for commercial/for-hire purposes) in lieu of managing a private use Not for-hire Automobile/Road Machine/Implement of Husbandry temporarily operated or moved on the roadways.**
3. **There was no evidence produced to sufficiently prove beyond a reasonable doubt that the Accused was NOT managing a private use Not for-hire Automobile/Road Machine/Implement of Husbandry for traveling purposes.**
4. **There was no evidence produced to the contrary that the Accused private use Not for-hire vehicle temporarily managed on the roadways is NOT used primarily for sustenance to ease the movement of People, "agricultural products" meaning any food product, goods and other personal property; not used for commercial purposes, not requiring a license nor registration.**
5. The immediate payment by the Plaintiff of \$_____ for all damages and harm done to the Accused by TAMPA POLICE DEPARTMENT Officer(s) Misconduct, for which sum let execution issue.

DONE AND ORDERED this 21 day of June, 2014.



THE HONORABLE CIRCUIT COURT JUDGE
THIRTEENTH JUDICIAL CIRCUIT
HILLSBOROUGH COUNTY, FLORIDA

Copies furnished to:
Al-Rashid Muhammad Abdullah :Bey
HON. MARK ALAN OBER, Office of the State Attorney
HON. PAMELA JO BOND, Attorney General

STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

THIS IS TO CERTIFY THAT THE FOREGOING IS A TRUE
AND CORRECT COPY OF THE DOCUMENT ON FILE IN
MY OFFICE. WITNESS MY HAND AND OFFICIAL SEAL
THIS 15 DAY OF July, 2014.



PAT FRANK, CLERK

BY

DEPUTY CLERK

Identification Number	Year	Make	Body	WT-L-BHP	Vessel Regis. No.	Title Number
2G1WF55K8Y9303263	2000	CHEV	4D	3387		82075764

Registered Owner:

Date of Issue 09/23/2011

RASHID MUHAMMAD ABDULLAH
808 W MADISON ST
PLANT CITY FL 33563-5330

Lien Release

Interest in the described vehicle is hereby released

By _____

Title _____

Date _____

IMPORTANT INFORMATION

1. When ownership of the vehicle described herein is transferred, the seller MUST complete in full the Transfer of Title by Seller section at the bottom of the certificate of title.
2. Upon sale of this vehicle, the seller must complete the notice of sale on the reverse side of this form.
3. Remove your license plate from the vehicle.
4. See the web address below for more information and the appropriate forms required for the purchaser to title and register the vehicle, mobile home or vessel: <http://www.hsmv.state.fl.us/html/titinf.html>

Mail To:

RASHID MUHAMMAD ABDULLAH
808 W MADISON ST
PLANT CITY FL 33563-5330



CERTIFICATE OF TITLE

Identification Number	Year	Make	Body	WT-L-BHP	Vessel Regis. No.	Title Number
2G1WF55K8Y9303263	2000	CHEV	4D	3387		82075764
Prev. State	Color	Primary Brand	Secondary Brand	No. of Brands	Use	Prev. Issue Date
FL	BLK				PRIVATE	11/03/2000
Odometer Status or Vessel Manufacturer or Offuse				Hull Material	Prop.	Date of Issue
EXEMPT						09/23/2011

Registered Owner:

RASHID MUHAMMAD ABDULLAH
808 W MADISON ST
PLANT CITY FL 33563-5330

1st Lienholder:

NONE

DIVISION OF MOTORIST SERVICES

TALLAHASSEE

FLORIDA

DEPARTMENT OF HIGHWAY SAFETY AND MOTOR VEHICLES

Sandra C. Lambert
Director

Control Number 104964383

Julie L. Jones
Executive Director

TRANSFER OF TITLE BY SELLER (This section must be completed at the time of sale.)

Federal and/or state law require that the seller state the mileage, purchaser's name, selling price and date sold in connection with the transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

This title is warranted to be free from any liens except as noted on the face of the certificate and the motor vehicle or vessel described is hereby transferred to:

Seller Must Enter Purchaser's Name:

Address:

Seller Must Enter Selling Price:

Seller Must Enter Date Sold:

I/We state that this ☐ 4 or ☐ 6 digit odometer now reads x (no fewer) miles, date read

and I hereby certify that to the best of my knowledge the odometer reading

☐ 1. reflects ACTUAL MILEAGE☐ 2. is IN EXCESS OF ITS MECHANICAL LIMITS☐ 3. is NOT THE ACTUAL MILEAGE

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THAT THE FACTS STATED IN IT ARE TRUE

SELLER Must

CO-SELLER Must

Sign Here:

Sign Here:

Print Name:

Print Name:

Selling Dealer's License Number:

Title No.:

Tax Collected:

Purchaser's Name:

License Number:

Sign Here:

Sign Here:

Print Name:

Print Name:

NOTICE: PENALTY IS REQUIRED BY LAW IF NOT SUBMITTED FOR TRANSFER WITHIN 30 DAYS AFTER DATE OF PURCHASE

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION

ABDULLAH, RASHID MUHAMMAD

Plaintiff,

v.

CITY OF PLANT CITY and SOUTHERN
TOWING & RECOVERY, INC.,

Defendants.

App. H

CASE NO.: 16-CA-004970

DIVISION: R

ORDER GRANTING IN PART AND DENYING IN PART
PLAINTIFF'S MOTION FOR COMPULSORY JUDICIAL NOTICE

This cause came on for hearing upon Plaintiff's motion for compulsory judicial notice heard by ZOOM on October 4, 2021, and the court, having heard the arguments presented by Plaintiff Rashid Muhammad Abdullah and Defendant City of Plant City, and being otherwise fully advised in the premises, hereby

ORDERS AND ADJUDGES:

1. Over objection by defense counsel, the court grants Plaintiff's request for compulsory judicial notice of Florida Statutes(2015) §316.003(16); now in 2021, §316.003(33):

IMPLEMENT OF HUSBANDRY.—Any vehicle designed and adapted exclusively for agricultural, horticultural, or livestock-raising operations or for lifting or carrying an implement of husbandry and in either case not subject to registration if used upon the highways.

2. Over objection of defense counsel, the court grants Plaintiff's request for compulsory judicial notice of "Order on Motions to Dismiss" dated June 24, 2014, executed by Judge Paul Jeske.
3. All other requests for judicial notice in Plaintiff's motion are denied, without prejudice.
4. The parties are directed to participate in mediation within sixty (60) days. The City of Plant City shall have all appropriate parties present at the mediation necessary to facilitate a full resolution.

DONE and **ORDERED** in the Hillsborough County Circuit Court, Eastern Division, in Plant City, Florida, this 15 day of October, 2021.

16-CA-004970-10/15/2021 0:21:56 PM
16-CA-004970 10/15/2021 1:21:56 PM

Honorable Judge Helene Daniel
Circuit Court Judge

cc: Rashid Muhammed Abdullah
Thomas P. Scarritt, Jr.

IN THE THIRTEENTH JUDICIAL CIRCUIT FOR THE STATE OF FLORIDA
PLANT CITY CIVIL DIVISION

AL-RASHID MUHAMMAD ABDULLAH,
Plaintiff,

vs.

CITY OF PLANT CITY, and SOUTHERN
TOWING & RECOVERY, INC.,
Defendants.

App. I

Circuit Case No.: 16-CA-4970

Division: R

ORDER DENYING REHEARING
and
DIRECTING CLERK TO CLOSE CASE FILE

Plaintiff's June 17, 2024 Motion for Rehearing (Doc. 162) is DENIED. The Clerk is directed to close the court file.

ORDERED in Tampa, Hillsborough County, Florida, on the date imprinted with the Judge's signature.

16-CA-004970 6/24/2024 9:41:04 AM
16-CA-004970 6/24/2024 9:41:04 AM

NANCY JACOBS, Circuit Judge

Copies to:

Al-Rashid Muhammad Abdullah: 808 W. Madison St., Plant City, FL 33563
Additional copies provided electronically through JAWS