

Shannah Kurland, Esq.

Mailing address: 149 Lenox Avenue, Providence, RI 02907
Office: 669 Elmwood Ave. Ste. B7, Providence
401.439.0518 :: skurland.esq@gmail.com



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VIA CERTIFIED FIRST-CLASS MAIL

Pawtucket City Council
137 Roosevelt Ave.
Pawtucket, RI 02860

RE: Presentment to Council of Claim or Demand Against City of Pawtucket by Tiqua Johnson, as Guardian and Next Friend of T.J., a Minor, Pursuant to R.I.G.L. §45-15-5

Dear Members of the Pawtucket City Council:

This letter hereby constitutes presentment to the Council of a claim or demand against the City of Pawtucket ("City") by my client, Tiqua Johnson as Guardian and Next Friend of her minor daughter, pursuant to R.I.G.L. §45-15-5. I represent Ms. Johnson and her daughter as a cooperating attorney with the American Civil Liberties Union Foundation of Rhode Island.

Ms. Johnson and her 14 year old daughter ("T.J.") are residents of Pawtucket. On June 3, 2019 at Goff Middle School, Pawtucket Police Officer ("School Resource Officer," or "S.R.O.") Darren Rose violated T.J.'s rights under the Fourth Amendment of the United States Constitution, actionable under 42 U.S.C. §1983, Article I, §6 of the Rhode Island Constitution, and R.I. Gen. Law §12-7-3, which limits the authority of police to arrest a person for a misdemeanor without a warrant, and R.I. Gen. Law §16-21.5-2, which prohibits school officials from making students available to police for questioning without first seeking parental consent.

Instead of complying with state or federal law, and in disregard of the pleas of T.J.'s mother to allow her to bring her daughter to the police station, Officer Rose decided to publicly arrest T.J., then a seventh grader, parade her through the school, and handcuff her before being placed in a police car without her mother, who was present. T.J. was then left in a holding cell at the police station for close to an hour before being released to her mother.

This outrageous arrest of an honor roll student with no history of disciplinary problems followed a minor altercation between T.J. and another student while Dean of Students James Diko stood less than five feet away but did nothing to intervene.

As a direct and proximate result of the aforesaid unlawful acts of Pawtucket Police and School Department officials, and the City's customs, practices, and failure to properly hire, supervise and train

these individuals, T.J. suffered physical pain, emotional distress, and other damages.

WHEREFORE, demand is hereby made on the City for compensatory damages equal to or greater than the statutory limit of \$100,000. Please note that this amount does not include compensatory or punitive damages awarded against any individual employee defendants, nor equitable or declaratory relief or attorneys' fees or costs for which the City may be liable under 42 U.S.C. §1988. If you have any questions regarding this claim, please contact the undersigned.

Tiqua Johnson
By her attorney,

Shannah Kurland, Esq.
R.I. Bar no. 9186
Cooperating Attorney,
American Civil Liberties Union Foundation of
Rhode Island