IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

Circuit Civil Division

CASE NO.: 2025-012312-CA-01

MIGUEL ANGEL QUINTERO

Plaintiff,

v.

MIAMI-DADE COUNTY, DAVID ALAN SHERMAN (individually and official capacity), and GERALDINE BONZON-KEENAN (individually and official capacity), Mayor DANIELLA SARAH LEVINE CAVA (individually and official capacity)

Defendants.

_____/

AMENDED VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, AND VIOLATION OF CONSTITUTIONAL RIGHTS

Plaintiff, MIGUEL QUINTERO ("Plaintiff"), pro se, hereby sues MIAMI-DADE COUNTY, DAVID SHERMAN (individually and in his official capacity), GERALDINE BONZON-KEENAN (individually and in her official capacity), and Daniella Sarah Levine Cava (individually and in her official capacity), (collectively, "Defendants"), and alleges:

JURISDICTION AND VENUE

1. This action seeks declaratory and injunctive relief and damages arising from violations of Plaintiff's constitutional rights under the Florida Constitution.

2. Jurisdiction is proper pursuant to Article V, Section 5(b) of the Florida Constitution and Chapter 26, Florida Statutes.
3. Plaintiff has standing to bring this action because he has suffered an actual, concrete, and particularized injury traceable to the actions of Defendants, which is redressable by this Court. The controversy is ripe for adjudication because Plaintiff has exhausted all administrative and judicial remedies available and continues to experience ongoing constitutional harm due to Defendants' actions and policies.
4. Venue lies appropriately in Miami-Dade County, Florida, as all events pertinent to this action transpired within this jurisdiction.

PARTIES

5. Plaintiff, MIGUEL QUINTERO, resides in Miami-Dade County, Florida, and was the subject of administrative code enforcement proceedings conducted by Miami-Dade County.
6. Defendant MIAMI-DADE COUNTY is a governmental entity and political subdivision of the State of Florida responsible for administrative code enforcement.
7. Defendant DAVID SHERMAN, at all relevant times, acted individually and in his official capacity as Assistant County Attorney, serving as prosecutor and advisor/ supervisor to the hearing officers presiding over administrative enforcement hearings.
8. Defendant GERALDINE BONZON-KEENAN is sued individually and officially as the County Attorney responsible for oversight and direction of the Miami-Dade County Attorney's Office, including Defendant Sherman's actions.

9. Defendant DANIELLA LEVINE CAVA is sued individually and officially as the Mayor of Miami-Dade County, responsible for overseeing the implementation of county policies and procedures, including administrative code enforcement actions challenged herein.

FACTUAL ALLEGATIONS

10. Plaintiff was issued administrative citations by Miami-Dade County alleging violations related to un-permitted structures at Plaintiff's residential property located at 9651 NW 13th Ave Miami, FL 33147.
11. Defendant Sherman prosecuted/litigated Plaintiff's administrative citations while simultaneously exercising supervisory and advisory authority over the hearing officer responsible for adjudicating such citations.
12. The dual role exercised by Defendant Sherman created a structural conflict of interest, violating Plaintiff's constitutional right to an impartial hearing under Article I, Section 9 of the Florida Constitution.
13. The hearing officer failed to issue competent, substantial findings of fact or conclusions of law, thereby undermining Plaintiff's rights (See Hayes v. Monroe County).
14. Plaintiff exhausted all administrative and appellate remedies, including appeals to the Circuit Court's appellate division and the Third District Court of Appeal, and a discretionary petition to the Florida Supreme Court, all denied, dismissed or "PCA'd" without substantive opinion.
15. Plaintiff has suffered continuing financial harm, reputational damage, and deprivation of fundamental constitutional rights resulting from Defendants' actions.
16. The issues raised in this complaint are not speculative or hypothetical. Plaintiff's harm is present and ongoing, and all administrative and appellate processes have concluded.

Thus, this dispute is ripe for judicial resolution and presents no barrier to this Court's exercise of jurisdiction.

17. Defendants' actions constitute a regulatory taking of Plaintiff's property under Article X, Section 6(a) of the Florida Constitution.

18. Plaintiff's property is, likewise, seized in violation of Article I, Section 12 of the Florida Constitution.

19. Miami-Dade County's administrative procedures represent an unconstitutional bill of attainder and contractual rights, violating Florida Constitution Article I, Section 10, by selectively imposing penalties without proper judicial protection.

ADDITIONAL FACTUAL ALLEGATIONS

20. The First District Court of Appeal (1st DCA), along with other appellate courts in Florida, have recently addressed critical issues pertaining to the scope, jurisdiction, and constitutional limitations of quasi-judicial administrative hearings. Specifically:

    A. The 1st DCA held that administrative hearing officers exercise quasi-judicial powers but cannot constitutionally exercise true judicial power, reaffirming that judicial authority is reserved exclusively for courts established under Article V of the Florida Constitution (Opinion No. 2020-3605).

    B. The 1st DCA emphasized that jurisdiction for administrative appeals must derive explicitly from general law, not from agency-created rules, underscoring the necessity for statutory authority to invoke appellate review (Opinion No. 2022-1139).

    C. The 3rd DCA, in Retirement Board of City of Coral Gables v. Piñon, 992 So.2d 357 (2008), affirmed that **common-law** certiorari jurisdiction applies in non-APA quasi-judicial settings, such as public retirement boards.

D. The 4th DCA, in Broward County v. G.B.V. International, Ltd., 787 So.2d 838 (2001), held that quasi-judicial actions not governed by APA or general law must seek remedy through **common-law** writ of certiorari in the circuit court, rather than direct APA appeal.

E. The Florida Supreme Court, notably in Ivey v. Allstate Ins. Co., Haines City Community Dev. v. Heggs, and Dusseau v. Metro. Dade County, reiterated the limited scope of district court review, restricting it strictly to procedural due process and essential legal compliance, explicitly **prohibiting evidentiary re-weighing**.

F. The 4th DCA, in Town of Jupiter (2003), emphasized municipal councils conducting quasi-judicial hearings outside the APA must have their actions reviewed by certiorari in circuit courts.

21. Florida Statutes § 34.01(1) and (1)(b), which has been in continuous statutory law since at least 1887 and § 26.012: Jurisdiction of circuit court. States:

> § 34.01 Jurisdiction of county court.—
> (1) County courts shall have original jurisdiction:
> (b) Of all violations of municipal and county ordinances.
>
> § 26.012 Jurisdiction of circuit court.—
> (1) Circuit courts shall have jurisdiction of appeals from final administrative orders of local government code enforcement boards and of reviews and appeals as otherwise expressly provided by law.
> (2) Circuit courts shall have exclusive original jurisdiction:
> (a) In all actions at law not cognizable by the county courts;
>
> (5) A circuit court is a trial court

COUNT I — DECLARATORY RELIEF (STRUCTURAL DUE PROCESS VIOLATION)

22. Plaintiff realleges and incorporates by reference paragraphs 1–21.

23. A substantial and justiciable controversy exists regarding whether Defendants' administrative enforcement structure violates due process.

24. Plaintiff seeks a judicial declaration that Defendants' practice of allowing prosecutorial, supervisory, and general counsel roles within the County Attorney's Office—particularly in relation to administrative hearing officers who adjudicate enforcement actions—constitutes an impermissible conflict of interest and fundamentally violates Plaintiff's due process rights under the Florida Constitution.

25. Plaintiff incorporates and reiterates the intent to seek class certification described fully in Count V.

COUNT II — VIOLATION OF ARTICLE I, SECTIONS 9 AND 21, FLORIDA CONSTITUTION

26. Plaintiff realleges and incorporates paragraphs 1–25.

27. The administrative process employed by Defendants denied Plaintiff meaningful access to a fair and impartial tribunal as guaranteed under the Florida Constitution, Article I, Sections 9 and 21.

28. Plaintiff seeks a declaration that the current procedures are unconstitutional and an injunction preventing further enforcement of the challenged citations.

29. Plaintiff incorporates and reiterates the intent to seek class certification described fully in Count V.

COUNT III — MALICIOUS PROSECUTION / ABUSE OF PROCESS (DAVID SHERMAN INDIVIDUALLY)

30. Plaintiff realleges and incorporates paragraphs 1–29.

31. Defendant David Sherman improperly involved himself in, maintained, and prosecuted administrative enforcement actions against Plaintiff knowingly, intentionally, maliciously, and in reckless disregard of Plaintiff's clearly established constitutional rights, due process protections, and procedural requirements. Sherman's conduct, undertaken in bad faith and with malicious intent, deliberately abused his official authority to cause Plaintiff unjustified financial harm, emotional distress, and reputational injury, warranting punitive damages under Florida Statute § 768.72. Defendants Daniella Sarah Levine Cava and county attorney Geraldine Bonzon-Keenan are likewise culpable of acting maliciously, and in reckless disregard of Plaintiff's established constitutional rights in their individual capacity and subject to punitive damages under Florida Statute § 768.72.
32. Such proceedings were procedurally defective and constitutionally invalid, and Plaintiff continues to seek relief to overturn or vacate the adverse outcome.
33. Defendants Sherman, Levine Cava, and Bonzon-Keenan's intentional misconduct, malice, and/or gross negligence described herein meet Florida's statutory punitive damages standard (§ 768.72), entitling Plaintiff to recover punitive damages specifically intended to punish Defendants Sherman, Levine Cava, and Bonzon-Keenan personally and deter similar future negligence.
34. Plaintiff has suffered damages including, but not limited to, financial harm, emotional distress, reputational damage, and continued unlawful enforcement actions.

COUNT IV — UNCONSTITUTIONAL TAKING (ALL DEFENDANTS)

35. Plaintiff realleges and incorporates by reference paragraphs 1–34.

36. Defendants' actions, including issuance of administrative citations, initiation of enforcement proceedings, and imposition or threat of fines and liens, have deprived Plaintiff of the use, value, and enjoyment of his property.
37. These burdens constitute a regulatory taking under Article X, Section 6, of the Florida Constitution.
38. Defendants have not provided just compensation nor demonstrated enforcement served a legitimate public interest proportionate to the private burden imposed.
39. Plaintiff suffered economic loss, diminished property value, and loss of liberty interests.
40. Plaintiff incorporates and reiterates the intent to seek class certification described fully in Count V.

COUNT V — ADMINISTRATIVE HEARINGS NOT BOUND BY THE ADMINISTRATIVE PROCEDURES ACT (APA), CHAPTER 162 ARE UNCONSTITUTIONAL, LACK JURISDICTION, AND CONSTITUTE A BILL OF ATTAINDER

41. Plaintiff realleges and incorporates paragraphs 1–40.
42. Defendant's Code of Ordinances, Chapter 8CC, § 8CC-6(e), stating precisely:

"The hearing need not be conducted in accordance with the formal rules relating to evidence and witnesses:

> Any relevant evidence shall be admitted if the Hearing Officer finds it competent and reliable, **regardless of the existence of any common law or statutory rule to the contrary.**" (Emphasis added)

43. Administrative hearings conducted by Defendants are not bound by Florida's Administrative Procedure Act (APA), Chapter 120, Florida Statutes nor Chapter 162 (as stated by defendants in a case directly tied to this complaint). Consequently, such

hearings operate without standardized procedural safeguards required by common law or general law (statutory law), thus violating fundamental principles of due process and judicial review.

44. The absence of APA applicability or Chapter 162 applicability renders these administrative hearings structurally defective and constitutionally invalid, lacking clear statutory jurisdictional authority and undermining procedural due process guaranteed by the Florida Constitution, Article I, Sections 9 and 21.

45. The appellate courts of Florida consistently require that quasi-judicial hearings must have explicit jurisdictional grounding in general law and cannot depend solely on administrative or internal agency rules for legitimacy (Opinion No. 2022-1139, G.B.V. International, Piñon).

46. Defendants are in strict violation of Florida Statute § 34.01(1)(b).

47. Defendants' administrative enforcement actions, therefore, constitute an unconstitutional exercise of quasi-judicial power without statutory or procedural legitimacy.

48. Defendants' administrative enforcement proceedings constitute an unconstitutional bill of attainder in violation of Article I, Section 10 of the Florida Constitution by legislatively targeting Plaintiff for punitive measures without proper judicial protections. These proceedings single out Plaintiff for penalties, fines, and reputational harm without procedural safeguards required under general law or constitutional due process.

49. Plaintiff intends to seek class certification pursuant to Florida Rule of Civil Procedure 1.220, as Defendants' unconstitutional administrative enforcement practices similarly affect numerous other property owners throughout Miami-Dade County. Should this Court grant class certification, Plaintiff explicitly states he will promptly retain licensed

legal counsel to adequately represent the class. Plaintiff acknowledges that, as a pro se litigant, he can litigate only his personal claims and is not licensed or qualified to represent the legal interests of other class members.

COUNT VI – VIOLATION OF FLORIDA CONSTITUTIONAL AMENDMENT OVERTURNING CHEVRON DEFERENCE

50. Plaintiff realleges and incorporates paragraphs 1–49.
51. Florida voters approved a constitutional amendment explicitly overturning Chevron deference, thereby restricting administrative bodies and hearing officers from unconstitutionally interpreting statutes or determining critical issues of law and fact.
52. Administrative hearings conducted by Defendants improperly rely on Chevron-like deference to agency interpretations, thus usurping judicial functions explicitly reserved for courts established under Article V of the Florida Constitution.
53. Defendants' administrative hearing structure deprives Plaintiff of a constitutionally bound hearing before an Article V Trial Court, thus violating Plaintiff's constitutional rights by delegating essential judicial responsibilities to administrative officers (unlicensed to practice law) without constitutional authority.
54. By failing to provide a judicial forum under Article V of the Florida Constitution for the resolution of material factual and legal disputes inherent in administrative enforcement, Defendants' actions constitute an unlawful delegation of judicial power and violate Plaintiff's fundamental constitutional rights.
55. Plaintiff has suffered harm, including deprivation of due process, loss of property rights, and denial of proper judicial review.
56. In the Florida Constitution, Amendment 6 (2018) added **Section 21 to Article V**, which explicitly eliminates any form of Chevron—and even Auer—deference. The text reads:

> "In interpreting a state statute or rule, a state court or an officer hearing an administrative action pursuant to general law may not defer to an administrative agency's interpretation of such statute or rule, and must instead interpret such statute or **rule de novo**." (Emphasis added)

57. Plaintiff incorporates and reiterates the intent to seek class certification described fully in Count V.

COUNT VII – VIOLATION OF FIRST AMENDMENT RIGHTS (POLITICAL SPEECH & ASSEMBLY) AND UNCONSTITUTIONAL IMPAIRMENT OF CONTRACTUAL OBLIGATIONS

58. Plaintiff realleges and incorporates paragraphs 1–57.

59. Defendants' actions constitute an unconstitutional infringement upon Plaintiff's right to political speech, assembly, and petition guaranteed under the Article I, Sections 4 and 5 of the Florida Constitution, by revoking critical permits essential for campaign events and security.

60. Defendants' revocation of necessary permits has directly interfered with Plaintiff's ability to campaign effectively, assemble supporters safely, and engage freely in political speech and activities.

61. Defendants' actions constitute an unconstitutional impairment of Plaintiff's contractual obligations under Article I, Section 10 of the Florida Constitution. Plaintiff had lawfully secured and paid for permits providing off-duty police detail essential to the safety and success of campaign events. Defendants revoked these paid-for permits solely based on Plaintiff being improperly labeled as a code enforcement violator, thereby unlawfully impairing contractual obligations and significantly interfering with Plaintiff's protected political speech, assembly, and petition rights.

62. Plaintiff has suffered substantial harm through suppression of his political speech and assembly rights, hindering his candidacy and public advocacy.

COUNT VIII – VIOLATION OF EQUAL PROTECTION (FOURTEENTH AMENDMENT)

63. Plaintiff realleges and incorporates paragraphs 1–62.
64. Defendants have engaged in discriminatory enforcement actions against Plaintiff without rational basis, thus violating Plaintiff's rights under Article I, Section 2 of the Florida Constitution.
65. Plaintiff has been unfairly targeted by enforcement actions differently from similarly situated individuals without legitimate governmental purpose or justification.
66. Plaintiff has suffered damages including reputational harm, financial loss, and emotional distress due to discriminatory and unequal treatment.

COUNT IX — VIOLATION OF FLORIDA STATUTE § 70.001 (BERT J. HARRIS ACT)

67. Plaintiff realleges and incorporates paragraphs 1–66.
68. Defendants' administrative enforcement actions impose an inordinate burden on Plaintiff's residential property, substantially diminishing its reasonable, investment-backed use and economic value.
69. Plaintiff has complied or intends to comply with statutory notice and demand requirements outlined in Florida Statute § 70.001, seeking resolution or compensation from Defendants.
70. Defendants failed to adequately remedy or compensate Plaintiff for the inordinate burden imposed.

71. Plaintiff has suffered significant economic loss and diminished property value due to Defendants' actions.

72. Plaintiff incorporates and reiterates the intent to seek class certification described fully in Count V.

COUNT X – PROCEDURAL DUE PROCESS VIOLATION (UNAUTHORIZED PHYSICAL POSTING) SLANDER-OF-TITLE AND STIGMA-PLUS DOCTRINES

73. Plaintiff realleges and incorporates paragraphs 1–72.

74. Miami-Dade County Code of Ordinances § 8CC-3(e), which mirrors Florida Statute § 162.12 (2), mandates personal service of notices as the primary method of notice, explicitly conditioning alternative physical posting methods upon failure of personal delivery.

75. Defendants failed to properly attempt personal service before physically posting the notice on Plaintiff's property, violating the explicit conditional procedure set forth by § 8CC-3(e) and Florida Statute § 162.12(2): Service of Notice.

76. Florida Rule of Civil Procedure 1.070 and applicable case law underscore the mandatory nature of such procedural requirements and the significance of adhering strictly to procedural prerequisites to ensure due process.

77. Defendants' failure to follow mandatory procedural prerequisites constitutes a clear procedural due process violation, resulting in unjustified harm including reputational damage, reduced property value, and deprivation of Plaintiff's right to adequate notice and opportunity to contest the alleged violation prior to public (physical) posting.

78. Plaintiff incorporates and reiterates the intent to seek class certification described fully in Count V.

EMERGENCY BASIS FOR EXPEDITIOUS REVIEW

Plaintiff respectfully files this Complaint on an emergency basis, requesting expedited judicial review due to immediate, ongoing, and irreparable harm. Plaintiff intends to formally announce his candidacy for Miami-Dade County Commission, District 2, imminently, as each passing day is vital for effective campaigning and securing public support. However, as a direct consequence of Defendants' unconstitutional enforcement actions challenged herein, Plaintiff has previously been denied—and anticipates continued denial of—essential permits required for off-duty police detail services provided by the Miami-Dade County Sheriff's Office. These off-duty police detail services are indispensable, providing critical public safety and security, particularly given the heightened risk inherent in public political campaigning, including the potential presence of individuals opposing Plaintiff's candidacy or seeking harm to Plaintiff and his campaign team.

Additionally, the presence of off-duty police detail is critically necessary due to specific venue logistics: attendees at Plaintiff's fundraising events must park approximately two blocks away and cross a heavily trafficked five-lane state road to reach the venue. Without professional police traffic control and pedestrian safety assistance, the safety of attendees is substantially compromised, underscoring the urgent necessity of immediate judicial intervention.

Moreover, Plaintiff emphasizes that these constitutional violations are not isolated. Numerous similarly situated stakeholders and homeowners throughout Miami-Dade County remain subject to these same unconstitutional enforcement practices, posing an ongoing and serious threat to the constitutional rights of residents county-wide. Plaintiff raises these broader implications solely to highlight the substantial public interest involved and the compelling urgency that warrants immediate judicial intervention. Prompt resolution by this Court will not only protect Plaintiff's

personal constitutional rights but also safeguard broader public interests and ensure judicial economy by addressing and rectifying these unlawful governmental practices.

REQUEST FOR TEMPORARY RESTRAINING ORDER (TRO)

A separate motion may be filed where, Plaintiff respectfully requests that this Court issue a Temporary Restraining Order pursuant to Florida Rule of Civil Procedure 1.610 to immediately pause, stay, or suspend the enforcement and collection of fines or actions related to the citations challenged herein. Plaintiff asserts that he meets all prerequisites for issuance of a TRO, specifically demonstrating that:

1. Plaintiff has a substantial likelihood of success on the merits of his claims as detailed in the verified complaint above.

2. Immediate and irreparable harm to Plaintiff will result without the requested TRO, as continued enforcement and collection actions impose significant economic, political and constitutional harms.

3. The threatened harm to Plaintiff outweighs any potential harm to Defendants from the issuance of a TRO.

4. The public interest favors granting this temporary relief, particularly given the constitutional significance and broader public implications of Defendants' enforcement practices as outlined above.

Plaintiff respectfully asks that the Court grant this TRO pending further hearings and until the merits of Plaintiff's complaint can be fully adjudicated.

PROCEDURAL STATEMENT

Plaintiff, appearing pro se, affirms awareness of all procedural requirements and deadlines under Florida Rules of Civil Procedure. For the benefit of judicial economy, clarity, and transparency, Plaintiff explicitly outlines the anticipated procedural steps following the filing of this Complaint:

1. Summons and Service of Process

Plaintiff will promptly ensure service of process upon all named Defendants pursuant to Fla. R. Civ. P. 1.070. Plaintiff acknowledges that proper service establishes this Court's jurisdiction over Defendants.

2. Defendants' Responsive Pleading

Defendants are required to file a responsive pleading or motion directed at this Complaint within 20 days of service as per Fla. R. Civ. P. 1.140(a). Plaintiff is prepared to respond substantively to any responsive pleading or motion filed.

3. Case Management and Discovery Procedures

Plaintiff anticipates compliance with all Case Management requirements set by the Court and will actively participate in the formulation and submission of any required Case Management Plans per Fla. R. Civ. P. 1.200.

Discovery shall proceed under Fla. R. Civ. P. 1.280–1.390, and Plaintiff is prepared to engage fully, transparently, and timely in written discovery, depositions, expert disclosures, and any discovery-related motions.

4. Pretrial Motions and Hearings

Plaintiff intends to address promptly and professionally any procedural or dispositive motions that arise, including motions to dismiss, motions for summary judgment, and any evidentiary hearings. Plaintiff recognizes the Court's authority under Fla. R. Civ. P. 1.140 and 1.510.

5. Trial and Pretrial Conference

If necessary, Plaintiff shall participate fully in pretrial conferences, mediation or alternative dispute resolution ordered by this Court, and prepare diligently for trial proceedings, jury or bench, pursuant to Fla. R. Civ. P. 1.200, 1.431, and 1.440.

Plaintiff explicitly states this procedural overview to assure the Court and all parties that despite Plaintiff's pro se status, Plaintiff will adhere meticulously to all procedural rules and expectations required of licensed attorneys admitted to practice before this Court.

Plaintiff expressly reserves the right to demand a trial by jury on all issues triable within the time period permitted by Florida Rule of Civil Procedure 1.430(b) (Bifurcation).

PRAYER FOR RELIEF

Plaintiff respectfully requests this Court enter judgment as follows:

Declaratory Relief:

1. Declare that Defendants' administrative enforcement scheme violates structural due process protections, resulting in unconstitutional practices.

2. Declare unconstitutional Defendants' administrative hearings conducted without adherence to Florida's Administrative Procedure Act (APA) or Chapter 162 of Florida Statutes.

3. Declare Defendants' administrative actions violate Amendment 6 (2018) of the Florida Constitution (overturning Chevron deference), unlawfully delegating judicial authority.

4. Declare Defendants' actions constitute an unconstitutional infringement upon Plaintiff's First Amendment rights to political speech and assembly.

5. Declare that Defendants' actions violate Plaintiff's equal protection rights under Article I, Section 2 of the Florida Constitution.

6. Declare that Defendants' actions have imposed an unconstitutional regulatory taking under the Fifth and Fourteenth Amendments of Article X, Section 6 of the Florida Constitution.

7. Declare that Defendants' unauthorized physical posting violated Plaintiff's procedural due process rights.

8. Declare Defendants' actions impose an inordinate burden under Florida Statute § 70.001 (Bert J. Harris Act).

Injunctive Relief:

9. Permanently enjoin Defendants from further enforcement or collection of fines arising from unconstitutional administrative citations.

10. Permanently enjoin Defendants from conducting quasi-judicial administrative hearings that fail to adhere to Florida's APA or statutory (Chapter 162) procedural safeguards.

11. Permanently enjoin Defendants from continuing administrative hearings that improperly apply Chevron-like deference.

12. Permanently enjoin Defendants from further unconstitutional interference with Plaintiff's political speech, assembly rights, and campaign activities.

13. Permanently enjoin Defendants from engaging in discriminatory enforcement practices violating Plaintiff's equal protection rights.

14. Permanently enjoin Defendants from unauthorized postings absent strict compliance with statutory procedural requirements.

Remedial Actions:

15. Vacate all administrative orders, citations, and fines issued under unconstitutional proceedings or procedures.

16. Alternatively, grant Plaintiff a new and impartial trial or hearing regarding the disputed citations.

Monetary and Compensatory Relief:

17. Award Plaintiff compensatory and general damages for economic loss, emotional distress, reputational injury, and other harms resulting directly from Defendants' malicious prosecution and abuse of process, and separately award punitive damages against

Defendants David Sherman, Daniella Sarah Levine Cava, and Geraldine Bonzon-Keenan personally, based on clear and convincing evidence of intentional misconduct, malice, and/or gross negligence pursuant to Florida Statute §768.72, to punish Defendants personally and deter future egregious violations.

18. Award Plaintiff monetary compensation and general damages for economic losses, diminished property value, emotional distress, reputational harm, and other compensatory and general damages directly resulting from Defendants' unconstitutional actions.

19. Award just compensation to Plaintiff for the regulatory taking and violation of property rights, including damages under Florida Statute § 70.001.

Procedural and Other Relief:

20. Award Plaintiff costs and expenses incurred, including court fees and any applicable attorney's fees allowable under law.

21. Issue an order acknowledging Plaintiff's stated intention to seek class certification pursuant to Florida Rule of Civil Procedure 1.220, and set a preliminary schedule for briefing and adjudication of class certification matters at an appropriate procedural juncture, upon Plaintiff obtaining licensed legal counsel as required for representation of class members.

22. Grant any further relief deemed just, proper, and necessary to fully address all constitutional violations and injuries alleged herein.

EXHIBIT LIST

Exhibit A – Record on Appeal, misc documents germane or potentially germane to the case.

Exhibit B – Rules, case history, misc documents germane or potentially germane to the case.

Exhibit C – Emails, misc documents germane or potentially germane to the case.

Exhibit D – Rules, Orders, misc documents germane or potentially germane to the case.

Exhibit E – All videos on the YouTube channel - Miami Circus - @miamicircus305

VERIFICATION

Under penalty of perjury, I hereby declare that the factual allegations within this Complaint are true and accurate to the best of my knowledge and belief.

Executed this 7th day of September, 2025.

Respectfully submitted,

By: /s/ *Miguel Quintero*
Miguel Quintero
Pro se
9651 NW 13th Ave
Miami, FL 33147
305.216.1497
MiguelQuintero100@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this amended verified complaint filed this 7th day of September, 2025, a true and correct copy of the foregoing AMENDED VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF, AND VIOLATION OF CONSTITUTIONAL RIGHTS has been furnished by email via the Florida Courts E-Filing Portal to the Parties associated with this case and the County attorneys on record familiar with this case, Cristina

Rabionet at rabione@miamidade.gov, David Alan Sherman at david.ShermanCAO@miamidade.gov and sherman@miamidade.gov, Geraldine Bonzon-Keenan at gbk@miamidade.gov and atty@miamidade.gov, Miami-Dade County and Mayor Daniella Levine Cava at daniella.levinecava@info.miamidade.gov and mayor@miamidade.gov.

By: /s/ *Miguel Quintero*
Miguel Quintero
Pro se
9651 NW 13th Ave
Miami, FL 33147
305.216.1497
MiguelQuintero100@gmail.com