

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA
CIVIL DIVISION

BRYANT MIDDLETON,
WILLIAM HORNE,
ROGER KISER, and
JIMMY JACKSON, individually and
on behalf of all others similarly situated,

CASE NO.: 08-19597CI-19

Plaintiffs,

CLASS REPRESENTATION

vs.

THE FLORIDA DEPARTMENT OF
AGRICULTURE, THE FLORIDA
DEPARTMENT OF CHILDREN
& FAMILY SERVICES, THE FLORIDA
DEPARTMENT OF JUVENILE JUSTICE,
THE FLORIDA DEPARTMENT OF
CORRECTIONS, TROY TIDWELL,
and ROBERT E. CURRY,

Defendants.

AFFIDAVIT OF THOMAS PADGETT

STATE OF FLORIDA)

COUNTY OF Pinellas)

Before me, the undersigned authority, personally appeared THOMAS PADGETT,
who upon being duly sworn states that:

I, THOMAS PADGETT, am over the age of eighteen (18) and have personal
knowledge of the facts stated herein.

I was sent to the Florida School for Boys in Marianna, Florida, in approximately 1967
for one year, and again in approximately 1968 for about eight to nine months. I was twelve
(12) years old when I was first sent there, and prior to being sent, I was not provided the

benefit of an attorney, was not given a trial, and was not informed of the length of my sentence. The first time I was sent was for running away from home and the second time involved a stolen car.

While there, I was beaten many times by Mr. Tidwell, Mr. Crockett, and Mr. Cox. Mr. Tidwell beat me with a leather strap and I received approximately 8 to 10 licks. I was also beaten by Mr. Crockett, who struck me in the face, causing my nose to bleed, which continues to trouble me to this day.

On one occasion, I ran away from Marianna and made it all the way home to St. Petersburg. When I was returned to Marianna I was placed in a solitary confinement unit. Mr. Crockett and Mr. Cox came to the solitary confinement unit and beat me with their fists and kicked me for approximately 10 to 15 minutes. I suffered injuries to the ribs, face, had two black eyes, my nose was bleeding, and I was told that they should kill me because they almost lost their jobs because I ran away. I was taken to the infirmary with bruises, a bloody nose, and black eyes, and my ribs were sore for at least three months. I was approximately 12 or 13 years of age at the time of this beating.

When I was approximately 12 years old, my cottage father, Mr. Chitwood, performed oral sex on me four times. On the last incident, I was injured in that my foreskin was pulled back and was cut. The cottage father took me to the infirmary and told me that if I told what happened, I would regret it for the rest of my life, and he threatened to kill me. I was transferred to Jackson County Hospital and after two days, the doctor performed a circumcision surgery on me. The doctor at the hospital repeatedly asked me what happened, but I was too scared to tell the truth.

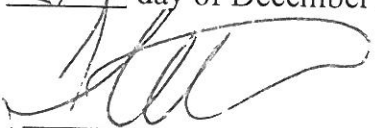
On another occasion, I was sexually abused by a coach whose name I do not remember. This sexual abuse occurred in one of the staff housing units up on the "hill", which was approximately 100 to 150 yards from the ballpark field.


THOMAS PADGETT

STATE OF FLORIDA)
COUNTY OF Pine Hills)

I HEREBY CERTIFY that on this day personally appeared before me, an officer duly authorized to administer oaths and take acknowledgments, THOMAS PADGETT, who is personally known to me or who produced the following as identification: _____, and who signed the foregoing, and who acknowledged before me that he did so as his free act and deed, and who did take an oath.

Sworn to and subscribed before me this 21st day of December 2009.



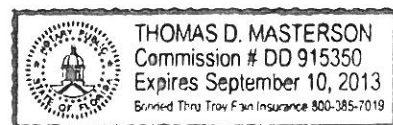
Notary Public, State of Florida

Thomas D. Masterson
Name of Notary, typed, printed or stamped

Commission No.

(Notarial Seal)

My Commission Expires:



IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA
CIVIL DIVISION

BRYANT MIDDLETON,
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AGRICULTURE, THE FLORIDA
DEPARTMENT OF CHILDREN
& FAMILY SERVICES, THE FLORIDA
DEPARTMENT OF JUVENILE JUSTICE,
THE FLORIDA DEPARTMENT OF
CORRECTIONS, TROY TIDWELL,
and ROBERT E. CURRY,

Defendants.

AFFIDAVIT OF HERBERT BAKER

STATE OF FLORIDA)

COUNTY OF Duval)

Before me, the undersigned authority, personally appeared HERBERT BAKER, who
upon being duly sworn states that:

I, HERBERT BAKER, am over the age of eighteen (18) and have personal knowledge
of the facts stated herein.

I was sent to the Florida School for Boys in Marianna, Florida in the mid-1950's, due
to my truancy from school in sixth grade. I was sent there two times; the first time I was

there for almost one year, the second time I was there for ten months. Prior to being sent to the school, I was not provided the benefit of an attorney, I was not given a trial, and I was not informed how long I would be there.

During my first stay at the Florida School for Boys, I was sent to a building called the "White House" because I had too many low grades. I was beaten by Mr. Marbley and Mr. Tidwell. I was given twenty lashes. The second time I was sent to the "White House" for fighting. This time I was given 21 lashes.

During my second stay at the Florida School for Boys, I was molested by an instructor, Mr. Cole. Mr. Cole had me come to his apartment to clean it, where he then performed oral sex on me while he was masturbating. I was threatened not to disclose this.

To this day, I suffer from depression due to my experiences at the Florida School for Boys.

Herbert Baker
HERBERT BAKER

STATE OF FLORIDA)
COUNTY OF Doral)

I HEREBY CERTIFY that on this day personally appeared before me, an officer duly authorized to administer oaths and take acknowledgments, HERBERT BAKER, who is personally known to me or who produced the following as identification: DL, and who signed the foregoing, and who acknowledged before me that he did so as his free act and deed, and who did take an oath.

13260 320 43/270 EXP 4-7-2013

Sworn to and subscribed before me this 1st day of January, 2010.

MARY MAGGIE McPHERSON
Notary Public, State of Florida
My comm. exp. Apr. 12, 2011
Comm. No. DD 662693

Mary M. McPherson
Notary Public, State of Florida

Mary M. McPherson
Name of Notary, typed, printed or stamped

Commission No. DD 662693

My Commission Expires: 4/12/2011

(Notarial Seal)

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA
CIVIL DIVISION

BRYANT MIDDLETON,
WILLIAM HORNE,
ROGER KISER, and
JIMMY JACKSON, individually and
on behalf of all others similarly situated,

CASE NO.: 08-19597CI-19

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CLASS REPRESENTATION

vs.

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AGRICULTURE, THE FLORIDA
DEPARTMENT OF CHILDREN
& FAMILY SERVICES, THE FLORIDA
DEPARTMENT OF JUVENILE JUSTICE,
THE FLORIDA DEPARTMENT OF
CORRECTIONS, TROY TIDWELL,
and ROBERT E. CURRY,

Defendants.

AFFIDAVIT OF JOHN PATTERSON, JR.

STATE OF ^{Washington} FLORIDA)

COUNTY OF Grays Harbor

Before me, the undersigned authority, personally appeared JOHN PATTERSON, JR.,
who upon being duly sworn states that:

I, JOHN PATTERSON, JR., am over the age of eighteen (18) and have personal
knowledge of the facts stated herein.

I was sent to the Florida School for Boys in Marianna, Florida when I was 13 years
of age. I was sent there in April of 1967 for the offense of being ungovernable, and was
released in April of 1968. I was sent there again in September of 1969 for the offense of

incurability, and was released in June of 1970. I did not have the benefit of an attorney or a trial prior to being sent to Marianna, nor did I know the length of my sentence.

While at the school, I was taken to the "White House" several times. The first time I went to the "White House," I was taken by two staff persons. One of them was Troy Tidwell, who only had one arm. Inside the white house it was dark with only one small light. I was told to undress down to my underwear, to lie on an old iron type bed, to hold on a rail bar, told not to say anything and to look at the wall. Someone turned on a fan that made a lot of noise. The first time the strap hit my buttocks, the force lifted me up. I could tell the strap cut into my skin and that I was bleeding. Someone ended up sitting on my back. Afterward, my underwear stuck to my skin and I had a hard time going to the bathroom. After the beating, I was taken to the detention center and put into a small room for a few days.

One of the times that I was taken to the "White House" and beaten for trying to run away, I remarked to Mr. Tidwell that one of these days he will pay for the beating. At that point another staff person left the building, leaving me alone with Mr. Tidwell. He then told me that I was a very cute little boy and forced me to perform oral sex on him two times. Before we left the "White House," he told me I better not tell a soul about what had happened or I "would not make it home alive."

One night I was sleeping and the night person woke me up and took me down to a storage room. He forced me to perform oral sex on him and he performed anal sex on me. The pain was so bad I screamed, and he hit on the back of the head and told me to me to

keep my God damn mouth shut or he will make it even worse for me. The pain was so bad I thought I was going to die. It is a pain I will never forget.

The next day I ran away from the school and when I was caught I was taken to the white house where I was given 100 licks and taken to the detention so the cuts would heal.

One night I was caught smoking a cigarette. Mr. Tidwell and another staff person took me to the white house and I was given 25 licks with a leather strap. Afterwards, they took me to a room near the Wilson cottage, in the basement of a school building, known as the "rape room." They forced me to perform oral sex on them and they both raped me. They told me to keep my mouth shut about it or I would pay for it. I was very scared that if I said anything I would end up dead.

After beatings, I was placed in solitary confinement, which consisted of one person in a room with a window, or most of the time, without a window. There was a bucket to use as a toilet, the window would be closed, there was a single mattress on a cot similar to the one in the white house. I was given small rations of food, no activity time, and hosed down for showers one to two times a week.

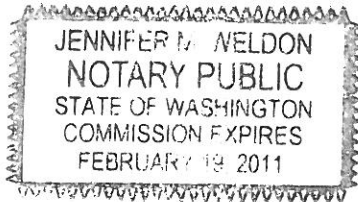

JOHN PATTERSON, JR.

STATE OF ~~FLORIDA~~ ^{Washington})
COUNTY OF Grays Harbor)

I HEREBY CERTIFY that on this day personally appeared before me, an officer duly authorized to administer oaths and take acknowledgments, JOHN PATTERSON, JR., who

is personally known to me or who produced the following as identification: John Patterson
_____, and who signed the foregoing, and who acknowledged before me that he did
so as his free act and deed, and who did take an oath.

Sworn to and subscribed before me this 17th day of January, 2010.



(Notarial Seal)

[Signature]
Notary Public, State of ~~Florida~~ Washington

Jennifer M Weldon
Name of Notary, typed, printed or stamped

Commission No. 124916

My Commission Expires: 19 Feb 2011

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA
CIVIL DIVISION

BRYANT MIDDLETON,
WILLIAM HORNE,
ROGER KISER, and
JIMMY JACKSON, individually and
on behalf of all others similarly situated,

CASE NO.: 08-19597CI-19

Plaintiffs,

CLASS REPRESENTATION

vs.

THE FLORIDA DEPARTMENT OF
AGRICULTURE, THE FLORIDA
DEPARTMENT OF CHILDREN
& FAMILY SERVICES, THE FLORIDA
DEPARTMENT OF JUVENILE JUSTICE,
THE FLORIDA DEPARTMENT OF
CORRECTIONS, TROY TIDWELL,
and ROBERT E. CURRY,

Defendants.

AFFIDAVIT OF JOHNY C. WILLIAMS

STATE OF FLORIDA)

COUNTY OF *Hillsborough*

Before me, the undersigned authority, personally appeared JOHNY C. WILLIAMS,
who upon being duly sworn states that:

I, JOHNY C. WILLIAMS, am over the age of eighteen (18) and have personal
knowledge of the facts stated herein.

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA
CIVIL DIVISION

BRYANT MIDDLETON,
WILLIAM HORNE,
ROGER KISER, and
JIMMY JACKSON, individually and
on behalf of all others similarly situated,

CASE NO.: 2008-19597CI-19

Plaintiffs,

CLASS REPRESENTATION

vs.

THE FLORIDA DEPARTMENT OF
AGRICULTURE, THE FLORIDA
DEPARTMENT OF CHILDREN
& FAMILY SERVICES, THE FLORIDA
DEPARTMENT OF JUVENILE JUSTICE,
THE FLORIDA DEPARTMENT OF
CORRECTIONS, TROY TIDWELL, and
ROBERT E. CURRY,

Defendants.

AFFIDAVIT OF JAMES M. BLOUNT

STATE OF FLORIDA)

COUNTY OF Citrus)

Before me, the undersigned authority, personally appeared JAMES M. BLOUNT, who
upon being duly sworn states that:

I, JAMES M. BLOUNT, am seventy-two (72) years old and have personal knowledge of
the facts included herein. I currently live in Floral City, Florida. I was self-employed in Citrus
County from the mid 1970s until 1999. I am currently retired and serve as a Deacon in the
United Church of God in Ocala, Florida.

I was sent to the Florida School for Boys in Marianna, Florida in 1949 at the age of
twelve (12). I was sentenced by Judge John Justice in Sarasota.

I was sent to the Florida School for Boys because my father had a stroke and was unable to support my family, my mother was struggling to try and support the family, and I ran away and, while attempting to survive on my own, I was taken into custody and sent to Marianna.

At the time I was sent to Marianna, I did not have the benefit of an attorney, and no trial was held to determine my guilt or innocence of any crime. When I was sent to Marianna, I had no idea of the length of my sentence.

From the time of my arrival at Marianna, I was told that I was sent there to be punished and not to be rehabilitated, and I was severely punished. The physical and emotional abuse at the boys at the school was continuous.

During my stay, I was subjected to physical and emotional abuse, which I believe caused psychological problems during my entire life. I experienced flashbacks and panic attacks for many years and went through treatment to help me with these issues.

The physical abuse which I witnessed or was subjected to included the following:

1. As a result of my work performance in the sewing room and in the laundry, I was taken to be punished in the building referred to as the "Ice Cream Factory." It was a small building, which I understand later became known as the "White House." I was taken to this building with other boys, and all of us were severely beaten on our backside with a leather strap. I was beaten by a man named Robert Hatton, while Mr. Dozier, a man after whom the school was eventually named, witnessed the beating.

The beating was so severe that I was left black from my waist to the back of my knees. Blood ran down my legs and into my shoes. The other boys who were beaten at that time all experienced similar abuse.

2. I was beaten on two (2) other occasions. I was beaten once without any explanation for why the beating took place. I was beaten by Mr. Hatton and received more than twenty (20) lashes with a leather strap. I was again left black and bleeding from this beating.

The third beating was also inflicted by Mr. Hatton. On this occasion, I was beaten with a board. As Mr. Hatton was beating me with the board, he was yelling and screaming while swinging the board with all of his might. I received sixty (60) licks. I was left black and bloody. I was so severely injured that I needed help from other boys to remove my clothes.

3. I saw the scars and bruises on other boys who were beaten in the Ice Cream Factory, currently known as the White House. In my work in the kitchen, I also saw boys who would go into the Ice Cream Factory for punishment and would have to be dragged out because they were unable to walk as a consequence of their beating. At times, I could hear boys yelling and begging Mr. Hatton to stop beating them as I worked in the area of the Ice Cream Factory. I saw one boy dragged from the Ice Cream Factory with men holding his wrists and ankles. The boy's body

was totally limp. The men threw the boy's body into the back of a pickup truck like a sack of feed. The boy never responded or made any movement to protect himself. It seemed to me that the boy was dead or near death.

4. I knew a boy who was beaten with an oak paddle for attempting to run from the school. I was told he received over one hundred (100) licks and had been bashed in the head with the paddle. He looked horrible after the beating. I spoke to the boy briefly in the infirmary, and, shortly following the beating, the boy disappeared, and I never saw him again.
5. I witnessed repeated abuse to boys by the staff, including making accusations that were untrue and ordering boys to fight one another on the basketball court for the enjoyment of the staff.
6. During my stay in Marianna, I was taken to the infirmary and told to wear a gown. I was told that I would have my tonsils removed. I questioned this because I had no problem with my tonsils. I was told that they realized I had no problem, but that they needed to practice. When my tonsils were removed, I was semiconscious and able to hear all of the conversation during the surgery. The surgery was performed without my mother's knowledge or permission.

7. On one day while working a Grub Crew, a man in a pickup truck came and took me and two (2) other boys to an area near the Ice Cream Factory and told us to dig a hole about three (3) feet wide, five (5) feet long and four (4) feet deep. As soon as we were finished, we were taken back to the work crew and told that "we were never there," if asked. I believe that we were digging a grave and feared that it may have been for myself. The next time I saw the area it had been filled with dirt.

8. I was threatened with death if I told anyone about the abuse that had taken place during my stay at the school, which was for more than a year.

Dated: 12-24-09

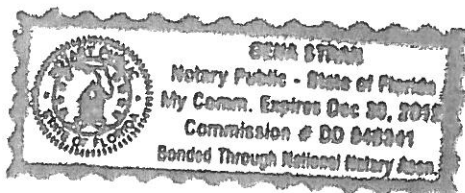
James M. Blount
JAMES M. BLOUNT

STATE OF FLORIDA)
) ss:
COUNTY OF Citrus)

Before me, the undersigned authority, personally appeared JAMES M. BLOUNT, who is personally known to me, or who has produced the following type of identification FLDL B453-453-36-059-0, and who, being first duly sworn, deposes and says that he has read the foregoing Affidavit, and it is true and correct to the best of his knowledge and belief.

Sworn to and subscribed before me this 24 day of December, 2009.

Gena Stran
NOTARY PUBLIC



Gena Stran
Printed Name

DD 848341
Serial Number

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA
CIVIL DIVISION

BRYANT MIDDLETON,
WILLIAM HORNE,
ROGER KISER, and
JIMMY JACKSON, individually and
on behalf of all others similarly situated,

CASE NO.: 2008-19597CI-19

Plaintiffs,

CLASS REPRESENTATION

vs.

THE FLORIDA DEPARTMENT OF
AGRICULTURE, THE FLORIDA
DEPARTMENT OF CHILDREN
& FAMILY SERVICES, THE FLORIDA
DEPARTMENT OF JUVENILE JUSTICE,
THE FLORIDA DEPARTMENT OF
CORRECTIONS, TROY TIDWELL, and
ROBERT E. CURRY,

Defendants.

_____/ AFFIDAVIT OF JIMMY JACKSON

STATE OF FLORIDA)

COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared Jimmy Jackson, who upon being duly sworn states that:

I, Jimmy Jackson, am over the age of eighteen (18) and have personal knowledge of the fact included herein.

During the period of 1963 and 1969, I was sent to the Okeechobee School for Boys on three (3) occasions. I was first sent to the School for Boys when I was approximately thirteen (13) years of age.

I was uncertain why I was being sent to Okeechobee. I did not have the benefit of an attorney or a trial prior to being sent to Okeechobee, nor did I know the length of my sentence in advance.

While a resident in the Florida School for Boys in Okeechobee, I was subjected to multiple beatings and other forms of abuse. The beatings were carried out with a weighted leather strap. I was tied to a bed in an area referred to as "ADJ" or the Adjustment Room. My feet and hands were tied to the rails of the bed as I was placed face down. I was then beaten on my backside repeatedly with a leather strap. The beatings broke the skin resulting in bleeding. I was also subjected on occasion to sexual punishment with the use of a device referred by the staff to as a "probing rod." This was a device with a polished knob on one end that was forced into my anus as a means of punishment.

While in Okeechobee, I became familiar with the forms of punishment utilized on other boys. Other boys were subjected to the same types of punishment to which I was exposed, and some were placed into solitary confinement.


JIMMY JACKSON

[illegible]


Before me, the undersigned authority, personally appeared JIMMY JACKSON who is personally known to me, or who has produced the following type of identification _____, and who, being first duly sworn, deposes and says that he has read the foregoing Affidavit, and it is true and correct to the best of his knowledge and belief.


Sworn to and subscribed before me this 28th day of December, 2009.

Fore me this 28th day of December, 2009.

Heather M. Gilley
NOTARY PUBLIC

NOTARY PUBLIC-STATE OF FLORIDA

Printed Name  Heather M. Gilkey
Commission # DD582434
Expires AUG. 07, 2010

Serial Number  BONDED THROUGH ATLANTIC BONDING CO., INC.

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, STATE OF FLORIDA
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BRYANT MIDDLETON,
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ROGER KISER, and
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DEPARTMENT OF JUVENILE JUSTICE,
THE FLORIDA DEPARTMENT OF
CORRECTIONS, TROY TIDWELL, and
ROBERT E. CURRY,

Defendants.

AFFIDAVIT OF MIKE SHAW

STATE OF North Carolina
COUNTY OF Guilford

Before me, the undersigned authority, personally appeared MIKE SHAW, who upon
being duly sworn states that:

I, MIKE SHAW, am over the age of eighteen (18) and have personal knowledge of the
facts included herein.

I was sent to the Florida School for Boys in Okeechobee, Florida in 1960 at the age of
Fourteen (14).

At the time I was sent to the Florida School for Boys in Okeechobee, I admit that I had a
problem with authority. I did not have the benefit of an attorney, and no trial was held to
determine my guilt or innocence. When I was sent to Okeechobee, I had no idea of the length
of my sentence, although at the time of my arrival I was informed that my sentence could run
until my Eighteenth (18) birthday.

I spent over two (2) years at the school. The abuse that was common at the school was beyond believe.

During my stay, I made efforts to escape on two (2) occasions. Following each attempt, I was beaten on my backside with a leather razor strap. I was required to lay face down on a bed, and was told to grab the rail of the bed and bite the pillow. I was beaten repeatedly until my buttock was black from the trauma.

Following each beating, I was placed in solitary confinement for thirty (30) to sixty (60) days. No family visitation was permitted following the beatings to prevent the families of the victims from seeing the wounds caused by the leather strap.

Dated: 1.6.2010

Mike Shaw
MIKE SHAW

STATE OF North Carolina
COUNTY OF Guilford) ss:

Before me, the undersigned authority, personally appeared MIKE SHAW, who is personally known to me, or who has produced the following type of identification S.C. Driver's License, and who, being first duly sworn, deposes and says that he has read the foregoing Affidavit, and it is true and correct to the best of his knowledge and belief.

Sworn to and subscribed before me this 6th day of January 2010.

Brenda S. Huffman
NOTARY PUBLIC

Brenda S. Huffman
Printed Name

BRENDA S HUFFMAN
NOTARY PUBLIC
Guilford County
North Carolina
My Commission Expires January 26, 2011

Serial Number _____