

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Komla Amouzou

(b) County of Residence of First Listed Plaintiff Delaware

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Law Offices of Robert T Vance Jr, 100 South Broad Street, Suite 905, Philadelphia PA 19110. 215 557 9550

DEFENDANTS

County of Delaware

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, 1 1, 2 2, 3 3, 4 4, 5 5, 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes codes like 110 Insurance, 210 Land Condemnation, 310 Airplane, 440 Other Civil Rights, 625 Drug Related Seizure, 710 Fair Labor Standards Act, 820 Copyrights, 870 Taxes, 375 False Claims Act, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 USC Section 1981

Brief description of cause: Employment discrimination - race

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE N/A DOCKET NUMBER

DATE 8/2/2023 SIGNATURE OF ATTORNEY OF RECORD [Signature]

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

(to be used by counsel to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: Aston, PA

Address of Defendant: Media, PA

Place of Accident, Incident or Transaction: Media, PA

RELATED CASE IF ANY:

Case Number: Judge: N/A Date Terminated

Civil cases are deemed related when Yes is answered to any of the following questions:

- 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes No [X]
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit Pending or within one year previously terminated action in this court? Yes No [X]
3. Does this case involve the validity or infringement of a patent already in suit or any earlier Numbered case pending or within one year previously terminated action of this court? Yes No [X]
4. Is this case a second or successive habeas corpus, social security appeal, or pro se case filed by the same individual? Yes No [X]

I certify that, to my knowledge, the within case is/is not related to any now pending or within one year previously terminated action in this court except as note above.

DATE: 8/2/2023 Attorney-at-Law (Must sign above) 37692 Attorney I.D. # (if applicable)

Civil (Place a check in one category only)

A. Federal Question Cases:

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
2. FELA
3. Jones Act-Personal Injury
4. Antitrust
5. Wage and Hour Class Action/Collective Action
6. Patent
7. Copyright/Trademark
8. Employment [X]
9. Labor-Management Relations
10. Civil Rights
11. Habeas Corpus
12. Securities Cases
13. Social Security Review Cases
14. Qui Tam Cases
15. All Other Federal Question Cases. (Please specify):

B. Diversity Jurisdiction Cases:

- 1. Insurance Contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury (Please specify):
7. Products Liability
8. All Other Diversity Cases: (Please specify):

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration)

I, Robert T Venue Jr, counsel of record or pro se plaintiff, do hereby certify:

[X] Pursuant to Local Civil Rule 53.2 § 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

[X] Relief other than monetary damages is sought.

DATE: 8/2/2023 Attorney-at-Law (Sign here if applicable) 37692 Attorney ID # (if applicable)

NOTE: A trial de novo will be a jury only if there has been compliance with F.R.C.P. 38.

United States District Court for the Eastern District of Pennsylvania

Komla Amouzou	:	
	:	
vs	:	Civil Action No.
	:	Jury Trial Demanded
County of Delaware	:	

Complaint

Plaintiff, Komla Amouzou, brings a series of claims against Defendant, County of Delaware, of which the following is a statement:

Jurisdiction and Venue

1. This Court has original jurisdiction to hear this Complaint and adjudicate the claims stated herein under 28 U.S.C. §§ 1331 and 1343, this action being brought under 42 U.S.C. § 1983 ("Section 1983"), the Civil Rights Act of 1866, 42 U.S.C. § 1981 ("Section 1981"), and the Civil Rights Act of 1991, Pub. L. 102-166, 105 Stat. 1071 (Nov. 21, 1991), to redress and enjoin the discriminatory practices of defendant. This Court may exercise supplemental jurisdiction over Mr. Amouzou's state law claim pursuant to 28 U.S.C. §1367.

2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to this case occurred in this judicial district.

The Parties

3. Plaintiff, Komla Amouzou, is an African American male citizen of the United States and a resident of this judicial district.

4. Defendant, County of Delaware (the "County"), is a political subdivision of the Commonwealth of Pennsylvania with its principal place of business located in Media, Pennsylvania.

5. At all times relevant to this action, the County was an “employer” within the meaning of Section 1983, Section 1981, and applicable state law.

6. The acts set forth in this Complaint were authorized, ordered, condoned, ratified and/or done by the County’s officers, agents, employees and/or representatives while actively engaged in the management of defendant’s business and pursuant to defendant's official policies and customs.

Background Facts

7. Mr. Amouzou was employed by the GEO Group as a Sergeant at the George W. Hill Correctional Facility beginning October 16, 2017.

8. Sometime prior to March 15, 2022, defendant decided to take over operation of the George W. Hill Correctional Facility from the GEO Group effective April 2022. In connection with that decision, by letter dated March 15, 2022, defendant offered Mr. Amouzou conditional employment for the position of Sergeant as a correctional officer at the George W. Hill Correctional Facility. Attached hereto as Exhibit A and made a part hereof is a true and correct copy of the letter dated March 15, 2022, from Iris Wiley, Human Resource Manager at the George W. Hill Correctional Facility, to Komla Amouzou.

9. By letter dated April 4, 2022, defendant rescinded the offer or conditional employment based on a review of Mr. Amouzou's employment history that allegedly revealed disqualifying disciplinary information and information allegedly "materially inconsistent" with the information he provided during the interview process. Attached hereto as Exhibit B and made a part hereof is a true and correct copy of the letter dated April 4, 2022, from Iris N. Wiley to Komla Amouzou.

10. Mr. Amouzou had no disqualifying disciplinary history and the information he provided during the interview process was truthful and consistent with the lack of a disqualifying disciplinary history. In fact, by letter dated April 8, 2022, Mr. Amouzou's then attorney informed defendant that the representations it made in the April 4, 2022 letter were incorrect, and requesting that defendant reconsider its decision to retract the conditional offer of employment. Attached hereto as Exhibit C and made a part hereof is a true and correct copy of the letter dated April 8, 2022, from John Alessandroni to Iris N. Wiley.

11. Defendant's decision to retract the conditional offer of employment was not justified by any facts, but rather was motivated by Mr. Amouzou's race.

12. By letter dated April 20, 2022, defendant's counsel informed Mr. Amouzou's then counsel that defendant would not change its decision to rescind the conditional offer of employment because it was based on Mr. Amouzou allegedly having violated the prison's use of force policy by assaulting an inmate in May 2020. Defendant's counsel further stated that Mr. Amouzou's alleged conduct "was a violation of policy and amounted to conduct unbecoming of a corrections professional." Attached hereto as Exhibit D and made a part hereof is a true and correct copy of the letter dated April 20, 2022, from John P. McLaughlin to John B. Alessandroni.

13. By letter dated August 10, 2022, Mr. Amouzou's then attorney informed defendant that its contention Mr. Amouzou had engaged in misconduct in May 2020 was false and defamatory. He further informed defendant that Mr. Amouzou's recent application for employment with the Delaware Department of Corrections was rejected based on statements made by defendant's employees, agents, and/or representatives, Keith Howard and S. Market concerning Mr. Amouzou's employment history and allegations against him that never were

substantiated. Mr. Amouzou's then attorney demanded defendant contact the Delaware Department of Corrections and retract the false and defamatory accusations it made against Mr. Amouzou. Attached hereto as Exhibit E and made a part hereof is a true and correct copy of the letter dated August 10, 2022, from John Alessandroni to John P. McLaughlin, Esq.

14. By letter dated October 5, 2022, defendant rejected the demands made by Mr. Amouzou's then attorney. Attached hereto as Exhibit F and made a part hereof is a true and correct copy of the letter dated October 5, 2022, from John P. McLaughlin to John B. Alessandroni, Esquire.

15. Despite defendant's position and statements to the contrary, the documentary evidence related to the May 2020 incident defendant relied upon to rescind the conditional offer of employment, the substance of which defendant knew to be false but nevertheless communicated to the Delaware Department of Corrections demonstrates that Mr. Amouzou did not engage in any misconduct while employed by the GEO Group. Attached hereto as Exhibit G and made a part hereof are true and correct copies of Incident Reports dated June 19, 2020.

16. Mr. Amouzou has suffered, is now suffering, and will continue to suffer emotional distress, mental anguish, loss of enjoyment of life and other pecuniary and non-pecuniary losses as a direct and proximate result of defendant's actions described above.

17. By reason of defendant's actions, Mr. Amouzou suffered and will continue to suffer extreme harm, including loss of income and other employment benefits, loss of professional opportunities, embarrassment and humiliation.

18. Defendant acted and failed to act willfully, maliciously, intentionally and with reckless disregard for Mr. Amouzou's rights.

Count I

The Civil Rights Act of 1866, 42 U.S.C. §1981

19. Plaintiff restates and realleges paragraphs 1- 18, inclusive, as though set forth here in full.

20. Mr. Amouzou had a federal statutory right under the Civil Rights Act of 1866, 42 U.S.C. §1981 (“Section 1981”), as amended, to be accorded the same rights as were enjoyed by White employees with respect to the terms and conditions of their employment relationship with defendant and to the enjoyment of all benefits, privileges, terms and conditions of that relationship.

21. Defendant’s conduct described above deprived Mr. Amouzou of the rights, privileges and immunities guaranteed to him under Section 1981.

22. By reason of defendant’s discrimination, Mr. Amouzou is entitled to all legal and equitable relief available under Section 1981.

Count II

Defamation

23. Plaintiff restates and realleges paragraphs 1-22, inclusive, as though set forth here in full.

24. Defendant knew or should have known that there was no basis in fact for the allegations it made against Mr. Amouzou with respect to his employment with the GEO Group and the May 2020 incident.

25. Defendant made the unfounded allegations against Mr. Amouzou with the specific purpose and intent of causing Mr. Amouzou economic and non-economic harm and

damage, and said allegations in fact caused Mr. Amouzou economic and non-economic harm and damage.

26. The false statements defendants made to the Delaware Department of Corrections were defamatory because they imputed a criminal offense, lowered Mr. Amouzou's reputation in the estimation of the community, deterred third persons from associating with him, and adversely affected his fitness for the proper conduct of his lawful business and profession.

27. The false statements were published by defendant.

28. The defamatory meaning of the false statements made by defendant was understood by the recipients thereof, the recipients thereof understood that they were intended to apply to Mr. Amouzou, Ms. Amouzou suffered harm as a result of their publication, and whatever conditional privilege may have applied to the statements was abused.

29. As a direct and proximate result of the defamatory statements described above published by defendant, Mr. Amouzou incurred economic and non-economic damages.

Jury Demand

30. Mr. Amouzou hereby demands a trial by jury as to all issues so triable.

Prayer for Relief

Wherefore, Plaintiff, Komla Amouzou, respectfully prays that the Court:

a. adjudge, decree and declare that defendant engaged in illegal discrimination, and that the actions and practices of defendant complained of herein are violative of his rights under Section 1981;

b. adjudge, decree and declare that defendant defamed Mr. Amouzou;

c. order defendant to provide appropriate job relief to Mr. Amouzou, including reinstatement;

d. enter judgment in favor of Mr. Amouzou and against defendant for all available remedies and damages under law and equity, including, but not limited to, back pay, front pay, past and future mental anguish, emotional distress, embarrassment, humiliation, and pain and suffering, in amounts to be determined at trial;

d. order defendant to pay the attorney's fees, costs, expenses and expert witness fees of Mr. Amouzou associated with this case;

e. grant such other and further legal and equitable relief as may be found appropriate and as the Court may deem just or equitable; and

f. retain jurisdiction until such time as the Court is satisfied that defendant has remedied the unlawful and illegal practices complained of herein and is determined to be in full compliance with the law.

Robert T Vance Jr
Law Offices of Robert T Vance Jr
100 South Broad Street, Suite 905
Philadelphia PA 19110
215 557 9550 tel / 215 278 7992 fax
rvance@vancelf.com

Attorney for Komla Amouzou

Exhibit A



COUNTY OF DELAWARE

GOVERNMENT CENTER BUILDING
201 WEST FRONT STREET
MEDIA, PENNSYLVANIA 19063

AREA CODE (610) 891-4852

COUNCIL

DR. MONICA TAYLOR
CHAIR

VICE CHAIR
ELAINE PAUL SCHAEFER

KEVIN M. MADDEN
CHRISTINE REUTHER
RICHARD R. WOMACK JR.

PERSONNEL / EMPLOYEE BENEFITS

JAMAL O. JOHNSON

March 15, 2022

Komla Amouzou
700 Cherry Tree Road
Apt J4
Aston, PA 19014

Dear Candidate,

We are pleased to offer you a conditional offer of employment for the position of Sergeant.

The position of Sergeant is an on-site position at the George W. Hill Correctional Facility in Thornton, PA. The position of Sergeant is a non-exempt role. Your target start date is 4-6-2022. Your position will report to the Lieutenant. Essential Job Duties include, but may not be limited to:

- Mandated Overtime
- Firearms qualifications will be anticipated

Your starting salary will be **\$23.80** hourly and payable biweekly. You will be entitled to receive a \$2,000 sign on bonus if you remain as an employee in good standing as follows: you will receive the first stipend of \$1,000 after completion of 120 days of hire, and the second stipend of \$1,000 if you are an employee in good standing after completion of 9 months of hire.

The County of Delaware offers a comprehensive benefits package to full-time employees. Your benefits will be effective on your start date on April 6, 2022. Please refer to the attached benefits handout for more details on your benefits package.

This offer is conditioned upon your successful completion of a background check, a medical evaluation including a drug screening, and a tuberculosis test. To facilitate the background check, please complete the attached authorization forms, sign, scan, and send them back to me as soon as possible. Additionally, to the extent you are employed by the current operator of the George W. Hill facility, this conditional offer may be rescinded if disciplinary action is taken against you by your current employer prior to the County's takeover of the facility.

On your first day of employment, you must complete an I-9 form and supply us with documents proving your identity and your legal right to work in the U.S. If you are unable to supply these documents, you will not be able to begin work. A list of acceptable documents is attached.

Please confirm your acceptance of this offer as outlined herein by signing the letter below and returning a copy to us no later than 3-18-2022. If you have any questions or if anything in this letter is not consistent with your understanding of our offer, please let me know immediately.

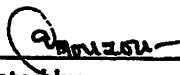
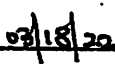
I hope this offer demonstrates the excitement on our part for you to join the County of Delaware.

I look forward to hearing from you and working with you on the County's important mission.

Sincerely,

Iris Wiley
HR Manager

I have read, understand and accept the offer of employment as outlined in this letter.

 _____ 

Accepted by

Date

(Signature)

223688710v1

Exhibit B



COUNTY OF DELAWARE
GEORGE W. HILL CORRECTIONAL FACILITY

HUMAN RESOURCES

P.O. Box 23
Thornton, PA 19373
(610) 361-3200 Ext. 254
FAX (610) 361 - 9689

Laura Williams
Warden

April 4, 2022

Dear Mr. Amouzou:

Thank you for your interest in the position of Sergeant with George W. Hill Correctional Facility. We appreciate your time, attentiveness, and patience throughout the transitional period and interview process.

As you are aware, on March 18, 2022, you received a conditional offer of employment as a Correctional Officer with the GW Hill Facility; that offer was subject to and conditioned upon your successful completion of a background check, a medical evaluation which included a drug screening, and our confirmation of the veracity of the information you provided to us during the interview process. These screenings were performed and the results reviewed along with your signed Institutional Clearance Profile.

Unfortunately, we regret to inform you that our review of your employment history has revealed disciplinary information that disqualifies you, and which also is materially inconsistent with the information you provided to us during the interview process. Thus, in accordance with the terms of the conditional offer extended to you, your offer of employment is hereby rescinded.

We do thank you for your interest in working with the County, and we wish you good luck in your future endeavors.

Respectfully,

Iris N. Wiley
Human Resource Manager
George W. Hill Correctional Facility

Exhibit C

**JOHN B. ALESSANDRONI
ATTORNEY AT LAW
8600 WEST CHESTER PIKE, SUITE 310
UPPER DARBY, PA. 19082
Phone 610-924-9000
Fax 610-924-9091
alessandroni@verizon.net**

April 8, 2022

Iris N. Wiley
Human Resource Manager
George W. Hill Correctional Facility
P.O. Box 23
Thornton, Pa. 19373

Re: Komla Amouzou

Dear Ms. Wiley:

I am writing to you on behalf of Sergeant Komla Amouzou. Sgt. Amouzou has provided me with a copy of your March 15 and April 4, 2022, letters. As you know, you made a conditional offer of employment to Mr. Amouzou as a Sergeant before retracting the offer. You state in your April 4, 2022, letter that your review of Mr. Amouzou's employment history "has revealed disciplinary information that disqualifies you, and which also is materially inconsistent with the information you provided to us during the interview process." You fail to disclose the nature of the disciplinary action that was allegedly revealed in the file or how it was inconsistent with the information he provided during the interview process.

I have reviewed the situation with Sergeant Amouzou, and I am writing to ask that you reconsider your decision and offer him the position. Sergeant Amouzou assures me that he was never formally disciplined by the employer, and we maintain this position. He also stated that he was not aware of anything being placed in his file without his knowledge which is patently true. As a result, we submit that the Sergeant was always truthful. He tells me that he had a consistent work record of reporting for duty under all conditions. Given his experience and willingness to do this difficult job we urge you to hire him to work at the prison. Thank you for your attention to this matter.

Sincerely,

John Alessandroni

cc: Sergeant Komla Amouzou

Exhibit D



*One Belmont Avenue, Suite 300
Bala Cynwyd, PA 19004*

John P. McLaughlin
Attorney
Direct Dial: 610-227-2596
jmclaughlin@cdblaw.com

April 20, 2022

John B. Alessandroni, Esquire
Attorney at Law
8600 West Chester Pike, Suite 310
Upper Darby, PA 19082

RE: Mr. Amouzou Conditional Offer of Employment

Dear Mr. Alessandroni:

This firm represents the County of Delaware and the George W. Hill Correctional Facility in labor and employment matters. I write in response to your correspondence to Iris N. Wiley which the County received on April 11, 2022.

The County's decision to rescind Mr. Amouzou's conditional offer of employment will not be changed. That decision was based on the findings of an investigation that substantiated allegations that Mr. Amouzou violated the prison's policy against the use of force by assaulting an inmate in late May 2020. Mr. Amouzou's conduct was a violation of policy and amounted to conduct unbecoming of a corrections professional. Mr. Amouzou did not meet eligibility criteria for employment, and his conditional offer of employment was rescinded and shall remain rescinded.

Feel free to contact me if you have any further questions.

Very Truly Yours,

John P. McLaughlin

JPM/mh

Exhibit E

**JOHN B. ALESSANDRONI
ATTORNEY AT LAW
8600 WEST CHESTER PIKE, SUITE 310
UPPER DARBY, PA. 19082
Phone 610-924-9000
Fax 610-924-9091
alessandroni@verizon.net**

August 10, 2022

John P. McLaughlin, Esq.
Campbell Durrant, PC
One Belmont Avenue
Suite 300
Bala Cynwyd, Pa. 19004

Re: Komla Amouzou

Dear Mr. McLaughlin:

I am writing to you on behalf of Komla Amouzou. You will recall that Mr. Amouzou was a Sergeant at George W. Hill who worked at the prison for about five years when it was run by the GEO Group. When the County took over, they made a conditional offer of employment to Mr. Amouzou as a Sergeant before retracting the offer. The HR Manager wrote to Mr. Amouzou on April 4, 2022, stating that a review of Mr. Amouzou's employment history "has revealed disciplinary information that disqualifies you, and which also is materially inconsistent with the information you provided to us during the interview process."

I wrote to HR asking them to reconsider the decision and offer him the position. In response, I received your April 20, 2022, letter stating that the decision to rescind the offer was based upon the "findings of an investigation that substantiated allegations that Mr. Amouzou violated the prison's policy against the use of force by assaulting an inmate in late May 2020." You further accused Mr. Amouzou of conduct that "was a violation of policy and amounted to conduct unbecoming of a corrections professional." Once again, Mr. Amouzou categorically denies your allegations of misconduct, and we consider them to be false and defamatory. I demand that you and your client immediately cease and desist from making false and defamatory statements about my client.

As I told you before, Sergeant Amouzou assures me that he was never formally disciplined by the employer, and we maintain this position. Yet two years after the alleged incident, the employer refused to let him to continue to work based upon something that he had never been disciplined for. It makes no sense. The reason that I am writing to you is that your client continues to engage in defamation of my client by making false and defamatory statements.

Mr. Amouzou recently applied for a position with the Delaware Department of Corrections. He was proceeding towards obtaining a position until they performed a background check and spoke to Keith Howard an investigator and S. Market in HR. Since Mr. Amouzou never even worked for the prison after the County took over any inquiries should be referred to GEO. If any response is given it should be a vanilla one since again no investigation was ever conducted to our knowledge that substantiated the allegations. If it was why was my client allowed to work at the prison for another two years with no disciplinary allegations whatsoever. Again, it makes no sense. As a result of the libelous and/or slanderous and false information which was published by your client's agents and employees to a third party, Mr. Amouzou was rejected for the position causing him immediate and ongoing financial harm and potentially permanent damage to his reputation. Once again, we demand that you, your clients and each of their agents and employees immediately cease and desist from making false and defamatory statements about my client. I also demand that they immediately contact the Delaware Department of Corrections and correct the information and tell them the truth which is that no allegations against my client were ever substantiated. Thank you for your attention to this matter.

Sincerely,

John Alessandroni

cc: Sergeant Komla Amouzou

Exhibit F



*One Belmont Avenue, Suite 300
Bala Cynwyd, PA 19004*

John P. McLaughlin
Attorney
Direct Dial: 610-227-2596
jmclaughlin@cdblaw.com

October 5, 2022

John B. Alessandroni, Esquire
Attorney at Law
8600 West Chester Pike, Suite 310
Upper Darby, PA 19082

RE: Mr. Amouzou Conditional Offer of Employment

Dear Mr. Alessandroni:

I am writing in response to your August 10, 2022 correspondence regarding Komla Amouzou. In that correspondence, you requested that the County “cease and desist from making false and defamatory statements regarding” Mr. Amouzou. Your allegations lack merit. No one affiliated with the County has made any false or defamatory statements to the State of Delaware Department of Corrections (DelDOC) or any other person or entity relating to Mr. Amouzou.

After receiving your August 10, 2022 correspondence, the County investigated your allegations and discovered that as part of the interview process with DelDOC, Mr. Amouzou self-disclosed the information regarding an investigation from his past employment with the GEO Group. That self-disclosure included information regarding allegations of an inappropriate or excessive use of force incident with an incarcerated person while working for the GEO Group. He self-disclosed that he did not receive discipline for this incident but that it was neither substantiated nor cleared. In addition to his self-disclosures, he provided the names of witnesses for interview and signed an authorization for the DelDOC to investigate further. For some reason, while you baselessly blamed the County for Mr. Amouzou not receiving a job offer from DelDOC, none of this information was contained in your August 10, 2022 correspondence, so I bring this information to your attention at this time.

I also note that you and I have briefly discussed this matter in the past, once over the phone and via written correspondence. In each communication, you have resorted to baseless allegations regarding the County and its employees. Such baseless comments are neither helpful nor constructive.

John B. Alessandroni
October 5, 2022
Page 2

Feel free to contact me if you have any further questions.

Very Truly Yours,



John P. McLaughlin

Exhibit G

GEORGE W. HILL CORRECTIONAL FACILITY

Incident Report

To: Investigation

Date and Time: 06/19/2020 @ 10:00 Hrs.

From: SGT. Komla Amouzou

Location of Incident: Investigation Office

Nature of Incident: Report to investigation

Inmate(s) Involved: _____

Details of the Incident: Who, What, When, Where, & Why. State only facts and absolutely no editorializing:

On the above date and approximate time, I was called in investigation office with Union Representation Sgt. Jones to listen the phone recording on May 26th, 2020. On that day after the shake down, I was told by Sgt. Jones that inmate Argro, Shaheed fired from his job. I was the Unit Manager that day and I called the Unit informed the officer to have inmate Argro Shaheed packed his stuff I will be there to move him to different cell. He is fired from his job. On my arrival to the block, I was asking for inmate Argro Shaheed and told him to go move out his belongings from worker cell so I can find him another cell to move in. I did not ask inmate Giannopoulos to pack his belongs and I did not fire inmate Giannopoulos from his job position. I was only there to move inmate Argro Shaheed and they all were asking me "why are we getting fired" and I am trying to let them know that "I am not saying you all getting fire, inmate Argro Shaheed I am here to move because he went to other blocks told on them that we are on the Unit to shake down." Inmate Giannopoulos was making false allegation that he was fired from his job position on the phone conversation. I did not fire or said anything about inmate Giannopoulos been removed from his job position that day. He also stated in the phone conversation that "I was choked by Sgt. Amouzou." I, Sgt. Amouzou did not choke inmate Giannopoulos. End of the report.

Supervisor's Assessment: Include Date and Time AOD was notified and by whom. Not to be a reproduction of the incident report. Rather, the Supervisor's determination of the cause, effect, and conclusion of the incident.

Staff Member Name (Print and Sign): SGT. Komla Amouzou

Supervisor Assessing the Report (Print and Sign): _____

Shift Commander (Print and Sign): _____

GEORGE W. HILL CORRECTIONAL FACILITY

Incident Report

To: Investigation

Date and Time: 06/02/2020 @ 14:00 Hrs.

From: SGT. Komla Amouzou

Location of Incident: Unit 2 Day room

Nature of Incident: Report to investigation

Inmate(s) Involved: _____

Details of the Incident: Who, What, When, Where, & Why. State only facts and absolutely no editorializing:

On May 26,2020 at 9 pm this writer notified officer Doue via phone call to have inmate Shaheed pack his belongings and get ready to move out from the worker cell due to the fact that he went to the other blocks informed everyone to flush all the contraband that they have in their cells. After we all done for the shake down, this writer walked to unit 2 to have inmate Shaheed moved from worker cell. Upon arrival to the block, inmate Gionopolious came to my face with spray bottle point to my face and stated "do you want to fight?" I replied, "you stay away from me now; I am here for something important. I am not joking." As I was sitting on the table waiting for inmate Shaheed to pack his belonging, inmate Gionopolious left his phone conversation started approaching me and stated "what is your whole thing" at that point I holed my left hand out to create a safe distance and asked Gionopolious to go back on the phone before I slapped you for being in my personal space. Inmate Gionopolious came in contact with my hand. I did left the block went to the Control room and about 10 to 15 min later Officer Doue came to me and said that inmate Gionopolious told him That "Sgt. Just choked me" so what are you going to do about it. This writer walked to the block with inmate Statement sheet handed to Gionopolious to write the statement and told the officer to escort him to medical. He refused to write a statement and medical attention that he is fine. At 23:30, this writer was notified about refused to lock in. At my arrival to the unit I was notified that was inmate Gionopolious who refused to lock in and still stated you choked him. I went to his block and asked him to be escort to medical, but he still refused. I walked out and told the control officer to write it down in the log book that inmate Gionopolious refuse medical attention for several times. There was no force used, did not grab, or did not choke inmate by the neck that day that is why any incident report or use of force report was not generated that day. End of the report.

Supervisor's Assessment: Include Date and Time AOD was notified and by whom. Not to be a reproduction of the incident report. Rather, the Supervisor's determination of the cause, effect, and conclusion of the incident.

Staff Member Name (Print and Sign): SGT. Komla Amouzou

Supervisor Assessing the Report (Print and Sign): _____

Shift Commander (Print and Sign): _____

**Sunday, July 30, 2023 -
Saturday, August 5, 2023**

July 2023							August 2023						
S	M	T	W	T	F	S	S	M	T	W	T	F	S
25	26	27	28	29	30	1			1	2	3	4	5
2	3	4	5	6	7	8	6	7	8	9	10	11	12
9	10	11	12	13	14	15	13	14	15	16	17	18	19
16	17	18	19	20	21	22	20	21	22	23	24	25	26
23	24	25	26	27	28	29	27	28	29	30	31		
30	31												

	30 Sunday	31 Monday	1 Tuesday	2 Wednesday	3 Thursday	4 Friday	5 Saturday
7 AM	Jayden out 📍						Ebony's picnic 📍
8 AM							
9 AM							
10 AM			Williams pre-trial 📍 Myers mediation	ARD hearing		Prudence Marcus 📍	
11 AM		Rice vs Del Toro 📍				Luis Motta call	
12 PM							
1 PM							
2 PM					Craig Collier call 📍		
3 PM							
4 PM				Chat re TVPRA claims https://us02web.zoom.us/j/avery@corpac 📍			
5 PM							
6 PM							
7 PM							