

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 13-21570-CIV-BLOOM

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIAMI-DADE COUNTY, THE BOARD
OF COUNTY COMMISSIONERS, *et al.*,

Defendants.

**JOINT DECLARATION REGARDING ACTION STEPS TO ACHIEVE
COMPLIANCE WITH THE CONSENT AGREEMENT**

On March 29, 2019, the parties informed the Court of an action plan to achieve complete compliance with all paragraphs of the Consent Agreement that remained in partial compliance per the Tenth Monitoring Report following the compliance tour of February 11-14, 2019. As part of the action plan, the parties agreed to submit to the Court a joint declaration on or before June 21, 2019 certifying that the parties have completed all action steps agreed upon in the action plan.

The parties jointly declare that the parties have completed, among other items, the following in preparation for the eleventh compliance tour of September 24-27, 2019: (1) on March 30, 2019, the Monitors submitted comments to the parties on the Defendants' proposed action steps to achieve compliance with the Consent Agreement paragraphs that remained in partial compliance under Compliance Report #10; (2) on April 5, 2019, the parties and the Monitors conducted a conference call to review and finalize the action steps necessary to achieve complete compliance with the Consent Agreement; (3) on April 11, 2019, Defendants submitted to the United States and Monitors revised actions steps incorporating the feedback offered on April 5,

2019; (4) by June 1, 2019, the Defendants completed all agreed upon action steps intended to achieve complete compliance with the Consent Agreement and submitted supporting documents; (5) on June 5, 2019, the Monitors and the United States submitted to the County comments and questions regarding the Defendants' submission; and (6) on June 11 and 12, 2019, the parties and the Monitors held meet and confer conference calls to review the submission and respond to the Monitors' and the United States' comments of June 5, 2019.

Following the eleventh compliance tour of September 24-27, 2019, the parties and the Monitors expect that, if implemented, the actions steps agreed upon and reviewed will result in a finding of complete compliance with all outstanding provisions of the Consent Decree.

As part of the action plan, the parties and the Monitors have also agreed to the following future items and timelines: (1) the Monitors will produce a draft Compliance Report #11 by the week of October 7, 2019; (2) the parties will provide comments on the draft Compliance Report #11 by the week of October 21, 2019; (3) the Monitors will produce the final Compliance Report #11 by the week of October 28, 2019; and (4) the Court will hold a status conference on November 1, 2019.

Dated: June 19, 2019

Respectfully submitted,

FOR THE UNITED STATES

ERIC S. DREIBAND
Assistant Attorney General
Civil Rights Division

STEVEN H. ROSENBAUM
Chief
Civil Rights Division

Special Litigation Section

LAURA L. COWALL
Special Counsel
Civil Rights Division
Special Litigation Section

By: /s/ William G. Maddox

WILLIAM G. MADDUX
Special Florida Bar No. A5502483
Trial Attorney
U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530
Tel: (202) 514-6251
Fax: (202) 514-0212
Email: william.maddox@usdoj.gov

FOR THE DEFENDANTS

ABIGAIL PRICE-WILLIAMS
Miami-Dade County Attorney
Stephen P. Clark Center
111 N.W. 1st Street, Suite 2810
Miami, Florida 33128

By: /s/ Benjamin D. Simon

Benjamin D. Simon
Florida Bar No. 643378
email: bdsimon@miamidade.gov
Assistant County Attorney
Phone: (305) 375-5151

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2019, I electronically filed the foregoing document with the Clerk of Court using CM/ECF and served all parties listed below.

/s/ William G. Maddox

William G. Maddox

SERVICE LIST

United States of America v. Miami-Dade County, et al.,

United States District Court, Southern District of Florida
Case No. 13-21570-Civ-Bloom

Laura Cowall
U.S. Department of Justice
Special Litigation Section
601 D Street NW
Washington, DC 20004
202-514-1089
Email: laura.cowall@usdoj.gov

William G. Maddox
U.S. Department of Justice
Special Litigation Section
601 D Street NW
Washington, DC 20004
202-514-6251
Email: william.maddox@usdoj.gov

Veronica Vanessa Harrell-James
United States Attorney's Office
99 NE 4 Street
Miami, FL 33132
305-961-9327
Fax: 305-530-7139
Email: Veronica.Harrell-James@usdoj.gov

Bernard Pastor
Benjamin D. Simon
Assistant County Attorneys
Stephen P. Clark Center, Suite 2810
111 N.W. 1st Street
Miami, Florida 33128-1993
Tel: (305) 375-1506
Fax: (305) 375-5611
pastor@miamidade.gov
bdsimon@miamidade.gov