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Apr 25, 2014

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
14-60089-CR-DIMITROULEAS/SNOW

CASE NO. _____
18 U.S.C. § 241

UNITED STATES OF AMERICA

v.

JEFF ALAN POOLE,

Defendant.

_____ /

INFORMATION

The United States Attorney charges that, at all times relevant to this Information:

GENERAL ALLEGATIONS

1. The Broward County Sheriff's Office (hereinafter referred to as "BSO") employed approximately 6,300 employees, and was responsible for serving and protecting the citizens of Broward County, Florida.
2. One of the divisions of BSO was the Strategic Investigations Division (hereinafter referred to as "SID"), which would investigate major drug trafficking, among other offenses.
3. JEFF ALAN POOLE (hereinafter referred to as "POOLE") was a detective in SID.
4. In his oath of office, defendant POOLE swore to support, protect, and defend the Constitution and the Government of the United States and the State of Florida.
5. Scott W. Rothstein (hereinafter referred to as "Rothstein") was an attorney admitted to practice law in Florida. Rothstein was the Chief Executive Officer (CEO) and Chairman of Rothstein, Rosenfeldt and Adler, P.A.

6. Rothstein, Rosenfeldt and Adler, P.A. (hereinafter referred to as “RRA”) was a law firm with offices located at 401 East Las Olas Boulevard, Fort Lauderdale, Florida and elsewhere. The law firm employed approximately seventy attorneys and engaged in the practice of law involving a wide range of specialties, including labor and employment law.

7. A co-conspirator (hereinafter referred to as “the Police Co-conspirator”) was a Lieutenant with BSO. POOLE had known the Police Co-conspirator for many years, and the Police Co-conspirator had helped POOLE to remain in his position as a detective at SID.

8. In or about June 2009, an attorney who was a friend of Rothstein (hereinafter referred to as “Attorney A”) informed Rothstein that he was engaged in an ongoing dispute with his ex-wife over custody of their children.

9. Attorney A further informed Rothstein that his ex-wife was an abuser of prescription pills, and that the ex-wife would have pills in her possession.

10. Rothstein told Attorney A that Rothstein had friends in law enforcement who would have the ex-wife of Attorney A arrested.

11. As set forth below, on or about June 29, 2009, the ex-wife of Attorney A was arrested. On or about November 19, 2009, the Broward County State Attorney’s Office dismissed all charges against the ex-wife of Attorney A stemming from that arrest.

COUNT 1

(Conspiracy To Violate Civil Rights, 18 U.S.C. § 241)

1. The General Allegations of this Indictment are realleged and expressly incorporated herein as if set forth in full.

2. From in or about June 2009 through in or about July 2009, in Broward County, in the Southern District of Florida and elsewhere, the defendant,

JEFF ALAN POOLE,

did knowingly and intentionally, combine, conspire, confederate, and agree, with persons known and unknown to the United States Attorney, to oppress, threaten, and intimidate a person in the free exercise and enjoyment of rights secured to her by the Constitution and laws of the United States, that is, the right to be free from unreasonable searches and seizures under the Fourth and Fourteenth Amendments to the Constitution, which includes the right not to be arrested without probable cause and the right to be free from the use of unreasonable force by law enforcement officers, in violation of Title 18, United States Code, Section 241.

OBJECT OF THE CONSPIRACY

3. The object of the conspiracy was to serve the interests of the members of the conspiracy by having defendant POOLE and the Police Co-conspirator utilize their official positions in order to further the interests of Rothstein, RRA, and persons associated with Rothstein, whether or not there was a legitimate law enforcement purpose to do so.

DEFENDANT POOLE'S AGREEMENT TO VIOLATE CIVIL RIGHTS

4. Attorney A informed Rothstein as to his ex-wife's typical daily travels in order to facilitate her arrest.

5. Rothstein provided the typical daily travels of the ex-wife of Attorney A to the Police Co-conspirator.

6. The Police Co-conspirator solicited and obtained the agreement of POOLE to arrest the ex-wife of Attorney A, regardless of whether or not probable cause existed to do so.

7. On or about June 29, 2009, POOLE conducted surveillance of the ex-wife and conducted a traffic stop of her vehicle.

8. On or about June 29, 2009, POOLE conducted an unauthorized search of the ex-wife's possessions without probable cause to do so.

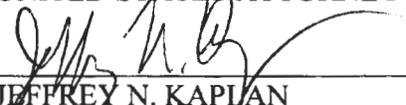
9. On or about June 29, 2009, POOLE placed the ex-wife under arrest.

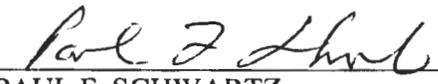
10. Subsequent to the arrest of the ex-wife, Attorney A obtained a copy of the arrest report in order to utilize it in his ongoing custody battle with her.

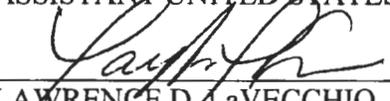
11. On or about July 2, 2009, Rothstein paid approximately \$1,000 in cash to the Police Co-conspirator in return for the Police Co-conspirator's assistance in the arrest of the ex-wife of Attorney A.

All in violation of Title 18, United States Code, Section 241.


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