Case Number: CACE-17-020718 Division: 03

IN THE CIRCUIT COURT OF THE 17TH JUDICIAL IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.:

JOSE CEPEDA as father and natural guardian of A.C. (a minor female),

Plaintiff,

VS.

CITY OF DEERFIELD BEACH, SOMERSET PINES CHARTER SCHOOL a/k/a SOMERSET PINES ACADEMY a/k/a SOMERSET ACADEMY, INC. and FRANCISCO DEARAGON,

Defenda	ants.	
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COMPLAINT

The Plaintiff, JOSE CEPEDA as parent and natural guardian of A.C., a minor female, by counsel, sues the Defendants and alleges:

GENERAL ALLEGATIONS

1. At all times material hereto, the Plaintiff JOSE CEPEDA is the parent and natural guardian of A.C., a minor female.

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- 2. The Defendant, CITY OF DEERFIELD BEACH AQUATIC CENTER, (hereafter the AQUATIC CENTER) is located at 501 SE 6th Avenue, Deerfield Beach, Florida.
- 3. The Defendant, SOMERSET PINES CHARTER SCHOOL a/k/a SOMERSET PINES ACADEMY a/k/a SOMERSET ACADEMY, INC. (hereafter SOMERSET ACADEMY) is a Florida Corporation with its principal place of business at 20801 Johnson Street, Pembroke Pines, Florida.
- 4. At all times material hereto, the Defendant, FRANCISCO DEARAGON, (hereafter DEARAGON) is a resident of the State of Florida, and was a swimming teacher/safety instructor at the AQUATIC CENTER.
- 5. On or about the May 19, 2015, it was uncovered that DEARAGON had been engaging in a series of serial and repeated acts of sexual molestation of multiple young children at the AQUATIC CENTER pool.
 - 6. The Broward County Sheriff's Office arrested DEARAGON.
- 7. The Broward County State Attorney's Office prosecuted DEARAGON and took his case to trial.
- 8. A Broward County jury, after hearing the evidence over several days of trial, found DEARAGON guilty of the following offenses against multiple young girls at the AQUATIC CENTER pool: sexual battery, lewd or lascivious molestation, and battery.

- 9. A Broward County Circuit Court Judge entered its judgment convicting DEARAGON of sexual battery, lewd or lascivious molestation, and battery of multiple young girls at the AQUATIC CENTER pool. See Judgment attached as Exhibit 1.
- 10. The Broward County Circuit Court Judge entered its order designating DEARAGON a sexual predator on May 25, 2017. See Order attached as Exhibit 2.
- 11. The Broward County Circuit Court Judge sentenced DEARAGON to the custody of the Florida Department of Corrections for multiple life sentences. DEARAGON is currently in the custody of the Florida Department of Corrections serving his life sentence.
- 12. One of the several children that DEARAGON sexually molested was A.C, a minor female. A.C. and the other victims waited until they were in a safe place to report the abuse.
- 13. A.C. was seven (7) years old at the time the sexual molestations were uncovered. The molestations robbed A.C. of her sense of trust and safety and caused emotional harm and physical harm.
- 14. Child sexual abuse is a known problem within our youth-serving organizations. 62,939 cases of child sexual abuse were reported in 2012, according to the United States Department of Justice. Research conducted by the

Centers for Disease Control estimates that approximately 1 in 6 boys and 1 in 4 girls are sexually abused before the age of 18. National estimates indicate that 80 percent to 90 percent of prison inmates were abused as children; and 70 percent or more of all sex offenders were themselves the victims of sexual assault or experienced sexual trauma as children. See, West's F.S.A. § 402.301. Further, it is generally accepted and well known that sexual abuse is committed against especially vulnerable victims by those who occupy sensitive positions of trust or authority over them. See, *Doe v. Evans*, 814 So.2d 370, 378 (Fla. 2002).

15. The deleterious effects of child sexual abuse are well known and are generally accepted. The National Institute on Drug Abuse has found that women who are sexually abused in childhood are at increased risk for drug abuse as adults, and that childhood sexual abuse is more strongly associated with alcohol and drug abuse than any other psychiatric disorder. The U.S. Department of Health and Human Services has found that childhood abuse leads to associated adult problems including flashbacks, nightmares, hypersensitivity, depressed outlook, being vulnerable to further victimization, and psychological numbness. The American College of Obstetricians and Gynecologists reports that long term effects of childhood sexual abuse are complex and often devastating, and survivors may be less likely to have regular Pap tests and may seek little or no

pre-natal care. The National Center for PTSD has acknowledged that PTSD is often linked to childhood sexual abuse.

- 16. The defendants have engaged in a pattern of additional harm, by denying the children's truthful complaints of sexual abuse; and, by attempting to secure an acquittal for DEARAGON, albeit unsuccessfully. Such conduct has had the effect of further shaming and humiliating the victims and their families.
- 17. At his sentencing hearing, DEARAGON testified that he forgives his multiple accusers just as Jesus Christ forgave those who crucified him.
- 18. The plaintiff has complied with all notice provisions of Fla. Stat. §768.28 and has complied with all other conditions precedent.

Count 1 - Negligence of the AQUATIC CENTER

- 19. The plaintiff re-alleges paragraphs 1 18 as if fully alleged herein.
- 20. In or around April, 2015, the AQUATIC CENTER was hiring a candidate for the position of swimming teacher/safety instructor, to work with small children at their pool.
- 21. The AQUATIC CENTER accepted a written and/or verbal employment application from DEARAGON.
 - 22. The AQUATIC CENTER hired DEARAGON for the position.
- 23. The AQUATIC CENTER placed DEARAGON in their pool to work directly with preschool age and elementary school age children.

- 24. The AQUATIC CENTER did not know whether DEARAGON was suitable or qualified or safe to work with young children.
- 25. Nevertheless, the AQUATIC CENTER placed DEARAGON in a position of trust with the children and gave him the opportunity to engage in regular and prolonged contact with them.
- 26. DEARAGON began sexually molesting the children while performing his job at the AQUATIC CENTER.
- 27. On or about May 15, 2015, A.C. SOMERSET ACADEMY took several of its kindergarten classes, including A.C.'s class, on a field trip to the AQUATIC CENTER pool.
- 28. On or about May 15, 2015, DEARAGON, while performing his job as swimming teacher/safety instructor, sexually molested A.C. and several other children that we know of. DEARAGON offensively and inappropriately touched A.C. in her private areas. See Information attached as Exhibit 3 and Exhibit 4.
- 29. The AQUATIC CENTER had the following duties and breached its duty of care in the following but not limited to respects:
 - in failing to hire qualified personnel, including but not limited to DEARAGON.
 - b) in failing to adequately train its personnel in the prevention of and identification of child sexual abuse, including but not limited to DEARAGON.

- o) in failing to adequately supervise its personnel; including but not limited to DEARAGON, to adequately supervise the safe operation of the pool, and to adequately supervise the children in the pool.
- d) in failing to develop and follow adequate policies and procedures to: guard against the risk of child sex abuse and other dangers; to protect children against foreseeable harms; and, to recognize and guard against grooming behavior which DEARAGON exhibited.
- e) in failing to warn parents and others, who left their children in the defendant's care, and who were totally dependent upon and trusted the defendant to prevent the children from being exposed to this kind of harm; in failing to warn the parents of A.C. that there was inadequate supervision, training, and policies and procedures that put A.C., and other minor children in danger; and, in failing to warn the children of the danger. (See, *Nazareth v. Herndon Ambulance Service, Inc.* 467 So.2d 1076, 1078 -1079)
- f) in failing to notice that DEARAGON inappropriately interacted not just with A.C. but with several other minor children, and was engaging in ongoing serial sexual molestations.
- g) in failing to discharge or remove DEARAGON from the AQUATIC CENTER when it became apparent that he was engaged in grooming behavior with the children in the pool for sexual exploitation.
- h) in failing to adequately staff the aquatic center.
- i) in failing to adequately report adverse incidents.
- j) in failing to adequately follow the guidelines for the maximum number of children allowable in a given swimming instruction class.

- 30. The AQUATIC CENTER negligently permitted the herein described sexual molestations to occur, including the abuse of A.C., by, inter alia, breaching the aforementioned duties.
- 31. These duties are critically important because parents and children are dependent upon the defendant for the safety and well-being of the children. The defendant knows or should know of the statistics cited herein, about the prevalence of and sexual abuse and the severity of the harm it causes.
- 32. The elementary school children under the care of the AQUATIC CENTER, were entitled to protection against sexual violence, molestation and attack upon their persons.
- 33. As a direct result of the aforementioned negligence, A.C. suffered bodily injury and resulting pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life and aggravation of the previously existing condition. She has also incurred and will incur in the future medical, psychiatric, nursing and vocational training expenses. The plaintiff, JOSE CEPEDA, as parent and natural guardian of A.C., a minor female, is responsible for all medical expenses, vocational expenses and special schooling expenses that the Plaintiff, A.C. has incurred and will incur in the future.

WHEREFORE, Plaintiff, JOSE CEPEDA, as parent and natural guardian of A.C., a minor female, demands judgment against the AQUATIC CENTER,

and demands judgment for damages which are in excess of Fifteen Thousand (\$15,000.00) Dollars, and further demands trial by jury.

Count 2 - Vicarious Liability of the AQUATIC CENTER

- 34. Plaintiff re-alleges paragraphs 1-33 as set forth fully herein.
- 35. At all times material hereto DEARAGON was acting as an agent of the AQUATIC CENTER. The AQUATIC CENTER had the ability and authority to direct and control the pertinent acts of DEARAGON.
- 36. At all times material hereto, DEARAGON, while sexually molesting A.C. and other children, was acting within the scope of his status as an agent for the AQUATIC CENTER. See, Hennagan v. Dept. of Highway Safety and Motor Vehicles, 467 So.2d 748, 751 (Fla. 1st DCA 1985), and, M.V. v. Gulf Ridge Council Boy Scouts of America, Inc., 529 So.2d 1248 (Fla. 2nd DCA1988).
- 37. DEARAGON used his position in the pool to sexually molest A.C. and other children while performing his work related duties of a swimming teacher/safety instructor.
- 38. DEARAGON's intentional molestations of A.C. and other children involved permitted touching done in the course and scope of DEARAGON's work followed by unpermitted touching, done in the same continuous concerted action. (See, *Gulf Ridge* at 1249, and *Hennagan* at 751.)

39. As a direct result of the aforementioned acts of DEARAGON and the AQUATIC CENTER's vicarious liability, the minor Plaintiff, A.C., suffered bodily injury and resulting pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life and aggravation of the previously existing condition. She has also incurred and will incur in the future medical, psychiatric, nursing and vocational training expenses. The plaintiff, JOSE CEPEDA as parent and natural guardian of A.C., a minor female, is responsible for all medical expenses, vocational expenses and special schooling expenses that the Plaintiff, A.C. has incurred and will incur in the future.

WHEREFORE, Plaintiff, JOSE CEPEDA, as parent and natural guardian of A.C., a minor female, demands judgment against the AQUATIC CENTER, and demands judgment for damages which are in excess of Fifteen Thousand (\$15,000.00) Dollars, and further demands trial by jury.

Count 3 - Negligence of SOMERSET ACADEMY

- 40. Plaintiff re-alleges paragraphs 1-33 as set forth fully herein.
- 41. At all times material herein, A.C. was a kindergarten student at SOMERSET ACADEMY.
- 42. SOMERSET ACADEMY arranged to send A.C. and its other kindergarten classes to the AQUATIC CENTER for a program called Swim

Central; a several week long program to teach the children swimming and swimming safety.

- 43. At all material times herein, SOMERSET ACADEMY knew or should have known that there were approximately four or more kindergarten classes participating in the AQUATIC CENTER Swim Central program, at the same time. The AQUATIC CENTER was crowded with multiple kindergarten classes.
- 44. At all times material herein, SOMERSET ACADEMY knew or should have known about the dangers at the AQUATIC CENTER, including the negligent qualification, training and supervision of DEARAGON and others, and the negligent supervision of the children. SOMERSET ACADEMY knew or should have known about DEARAGON's molestations.
- 45. At all material times herein and during the trips to the AQUATIC CENTER, SOMERSET ACADEMY had, among other duties, the duty to keep the children safe, to hire qualified personnel, to adequately train its personnel, to adequately supervise its personnel and the children, to ensure adequate supervision and safety of the children, and to implement adequate policies and procedures to keep the children safe from harm.
- 46. The kindergarten children under the care of SOMERSET ACADEMY, including A.C. were entitled to protection against violence, abuse,

or an assault or battery or sexual molestation upon their persons. Once the undertaking to care for kindergarten age children in a school has begun, this extraordinary duty to the children arises, and does not terminate until class day is complete.

- 47. The children and their families, including A.C. entrusted their safety to the care and control of the SOMERSET ACADEMY.
- 48. SOMERSET ACADEMY negligently permitted the herein described sexual molestations to occur, including the abuse of A.C., by, inter alia, breaching the aforementioned duties.
- 49. As a direct result of SOMERSET ACADEMY's negligence, the Plaintiff, A.C. suffered bodily injury and resulting pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life and aggravation of the previously existing condition. She has also incurred and will incur expenses for past and future medical, psychiatric, nursing and vocational training. The plaintiffs, JOSE CEPEDA, as parent and natural guardians of A.C. a minor female, is responsible for all medical expenses, vocational expenses and special schooling expenses that the Plaintiff, A.C. has incurred and will incur in the future.

WHEREFORE, Plaintiff, JOSE CEPEDA, as parent and natural guardians of A.C. a minor female, demands judgment against SOMERSET ACADEMY and

demands judgment for damages which are in excess of Fifteen Thousand (\$15,000.00) Dollars, and further demands trial by jury.

COUNT 4 - Intentional Acts of DEARAGON

- 50. Plaintiffs reallege paragraphs 1-18 as set forth fully herein.
- 51. As a direct result of DEARAGON's aforementioned assault and battery and sexual molestation, the Plaintiff, A.C., suffered bodily injury and resulting pain and suffering, disability, mental anguish, loss of capacity for the enjoyment of life and aggravation of the previously existing condition. She has also incurred and will incur in the future medical, psychiatric, nursing and vocational training in the past and in the future. The Plaintiff, JOSE CEPEDA as parent and natural guardians of A.C., a minor female, are responsible for all medical expenses, vocational expenses and special schooling expenses that the Plaintiff, A.C. has incurred and will incur in the future.

WHEREFORE, Plaintiff, JOSE CEPEDA, as parent and natural guardian of A.C., a minor female, demands judgment against DEARAGON, and demands judgment for damages which are in excess of Fifteen Thousand (\$15,000.00) Dollars, together with interest, costs and further demands trial by jury.

DEMAND FOR JURY TRIAL

Plaintiffs demand a jury trial for all claims for which they are entitled to a jury trial as a matter of right.

DATED THIS $\frac{3}{2}$ day of November, 2017.

Steinger, Iscoe & Greene, P.A. 1645 Palm Beach Lakes Blvd, West Palm Beach, FL 33401 (561) 616-5550

Neil P. Anthony, B.C.S. Florida Bar No.: 0070572

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Broward County Commission

**** FILED: BROWARD COUNTY, FL. Brenda D. Forman, CLERK 5/18/2017 1:39:44 PM.****

17th JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY

DIVISION: CRIMINAL	BA . T. LIBA . T. DEFIN CHAY . CHIEFE CEL		DIVISION: FG.		
Mr. Cillipin	JUDGME	NT SHE			
THE STATE OF FLOR	UDA VS.	CASE NUMBER			
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	Cou	irt Reporter N. De	riax	HER E NO	
The Defendant, <u>FrC</u>	incisco de Arogon	Ju 177	77. 1022	Court represented by	
S. Janau			IIPY C		
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الكلات	tery (lesser included offense)	784.03	<u> MM.</u>	Cliffit.	
The Defendant is he The Defendant is further	en shown why the Defendant should not be add GUILTY of the above crime(s). Ereby ordered to pay the sum of Fifty dollars (states ordered to pay the sum of Five Dollars (\$5.0 a sentence pursuant to F.S. 777.083(1) are to () The court hereby stays and withholds the and places the Defendant on probation supervision of the Department of Correct (c) The court hereby defers imposition of setting the property of the court hereby defers imposition of setting the property of the court hereby defers imposition of setting the property of the prop	\$50.00) pursuant to F.S. 93 0) as court costs pursuant to be recorded on the Sentence as for a period of cections (conditions of probeentence until	8.03 (Crimes Coop F.S. 938.03(1) are page(s).	np. Trust Fund). nd 938,15	
	Pay \$225.00 Trust Fund pursuant to F.S	5. 938.05(1)(a) (}	T. F. F. F. F.		
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CC 112-65 JUDGMENT			T OFFIE		

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO:

15006543CF10A

JUDGE:

DENNIS D. BAILEY

STATE OF FLORIDA,

Plaintiff,

Filed In Open Court, CLERK OF THE CIRCUIT COURT ON_5/25/17

FRANCISCO DE ARAGON,

Defendant.

ORDER FINDING DEFENDANT TO BE A SEXUAL PREDATOR PURSUANT TO THE FLORIDA SEXUAL PREDATOR ACT

THE DEFENDANT, Francisco De Aragon, having been convicted of CAPITAL SEXUAL BATTERY UPON A CHILD UNDER 12, which offense occurred on or after October 1, 1993, in violation of Florida Statute 794.011(2)(a), it is hereby:

ORDERED AND ADJUDGED that this Court finds the Defendant to be a Sexual Predator pursuant to Florida Statute 775.21, et seq.

DONE AND ORDERED in Fort Lauderdale Broward Country, Florida this

day of May 2017. NUNC protunc 5/18/17

HONORABLE DENNIS D. BAILEY

Circuit Court Judge

Copies furnished: Patyl Oflazian, Esq., ASA Scott Janowitz, Esq.



Filing # 28300042 E-Filed 06/10/2015 09:52:39 AM

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, STATE OF FLORIDA

THE STATE OF FLORIDA

INFORMATION FOR

VS

LEWD OR LASCIVIOUS MOLESTATION

FRANCISCO DE ARAGON

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that FRANCISCO DE ARAGON

on or about the 19th day of May, 2015, in the County and State aforesaid, being eighteen (18) years of age or older, did intentionally touch in a lewd or lascivious manner the genital area, or the clothing covering it, of A.P., a person less than twelve (12) years of age, contrary to F.S. 800.04(5)(a) and F.S. 800.04(5)(b).



STATE OF FLORIDA vs. FRANCISCO DE ARAGON

INFORMATION PAGE, 2

IDENTIFYING DATA:

HISPANIC, MALE, Height 5' 11", UNKNOWN Lbs, UNKNOWN Eyes, UNKNOWN Hair

DOB: 12/13/1988; Place of Birth: UNKNOWN

COUNTY OF BROWARD STATE OF FLORIDA

Personally appeared before me CHRISTINE ADLER, duly appointed as an Assistant State Attorney of the 17th Judicial Circuit of Florida, by MICHAEL J. SATZ, State Attorney of said Circuit and Prosecuting Attorney for the State of Florida in the County of Broward, who being first duly sworn, certifies and says that testimony has been received under oath from the material witness or witnesses for the offense(s), and the allegations as set forth in the foregoing Information would constitute the offense(s) charged, and that this prosecution is instituted in good faith.

SWORN TO AND SUBSCRIBED before me this day of the Lorida Broward of Planta Broward Court, 17th Judicial Circuit, Broward of the Within Information, Defendant pleaded

HOWARD C. FORMAN

Clerk of the Circuit Court, 17th Judicial Circuit, Broward County, Florida

HOWARD C. FORMAN

Clerk of the Circuit Court, 17th Judicial Circuit, Broward County, Florida

CA: mj-06-05-2015-2

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, STATE OF FLORIDA

THE STATE OF FLORIDA

INFORMATION FOR

VS.

LEWD OR LASCIVIOUS MOLESTATION

FRANCISCO DE ARAGON

II. LEWD OR LASCIVIOUS MOLESTATION



IN THE NAME AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

MICHAEL J. SATZ, State Attorney- of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the County of Broward, by and through his undersigned Assistant State Attorney, charges that-FRANCISCO DE ARAGON

on or about the 19th Day of May, 2015, in the County and State aforesaid, being eighteen (18) years of age or older, did intentionally touch in a lewd or lascivious manner the genital area, or the clothing covering it, of A.C., a person less than twelve (12) years of age, contrary to F.S. 800.04(5)(a) and F.S. 800.04(5)(b). (L9).

COUNT II

MICHAEL J. SATZ, State Attorney of the Seventeenth Judicial Circuit of Florida, as Prosecuting Attorney for the State of Florida in the-County of Broward, by and through his undersigned Assistant State Attorney, charges that FRANCISCO DE ARAGON

on or about the 19th Day of May, 2015, in the County and State aforesaid, being eighteen (18) years of age or older, did intentionally touch in a lewd or lascivious manner the genital area, or the clothing covering it, of B.E., a person less than twelve (12) years of age, contrary to F.S. 800.04(5)(a) and F.S. 800.04(5)(b). (L9).



STATE OF FLORIDA vs. FRANCISCO DE ARAGON INFORMATION PAGE, 2

IDENTIFYING DATA:

HISPANIC, MALE, Height 5' 11", 315 Lbs, BROWN Eyes, BLACK Hair

DOB: 12/31/1988; Place of Birth: UNKNOWN

COUNTY OF BROWARD STATE OF FLORIDA

Personally appeared before me CHRISTINE ADLER, duly appointed as an Assistant State Attorney of the 17th Judicial Circuit of Florida, by MICHAEL J. SATZ, State Attorney of said Circuit and Prosecuting Attorney for the State of Florida in the County of Broward, who being first duly sworn, certifies and says that testimony has been received under oath from the material witness or witnesses for the offense(s), and the allegations as-set forth in the foregoing Information would constitute the offense(s) charged, and that this prosecution is instituted in good faith.

CA: mj-0.6-3-2015-1