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May 13, 2010

VIA FACSIMILE (941-480-1446) & REGULAR U.S. MAIL

Robert C. Anderson, City Attorney
City of Venice, Florida
1314 E. Venice Ave.
Venice, Florida 34285

Re: Venice Police Department Officer, Demitri N. Serianni

Dear Mr. Anderson:

Our firm has just been retained by, and has the pleasure of representing, Venice Police Department ("VPD") Officer, Demitri N. Serianni. Please deem this letter as a Notice of Appearance in his behalf and kindly direct any and all further correspondence concerning any current internal affairs investigations to the undersigned, at the address above.

I am writing due to the fact that Sergeant Ronald Perisho of the VPD is attempting to continue with an internal affairs investigation despite being placed upon notice of an alleged violation of the law enforcement Officer's "Bill of Rights" as codified at §§112.531, et seq., Florida Statutes. Specifically, Sgt. Perisho desires to continue with questioning our client tomorrow, May 14, 2010, despite receiving a notice of a violation of Officer Serianni's rights in accordance with §112.534, Florida Statutes. Pursuant to this provision of the Officer's Bill of Rights, the investigation should cease pending the outcome of the compliance review hearing set forth in the statute. For Sgt. Perisho to insist upon continuing with the investigation after receiving notice of an alleged violation, is unlawful. We would also contend that, because the Performance Improvement Plan ("PIP"), which we contend was unwarranted and retaliatory for our client's earlier affidavit in support of a fellow officer, includes "discipline up to and including termination," any questions about the PIP also invoke the Bill of Rights.

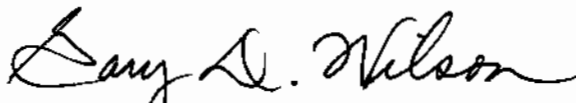
A more detailed statement of the violation of our client's rights will be forthcoming; however, this letter is being sent to provide a prompt request to have the IA questioning cease, pending the outcome of the compliance review hearing. After the hearing under §112.534 is completed, Officer Serianni will be more than happy to answer any questions directly and

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narrowly related to any allegations against him, with counsel present. In the alternative, a new IA investigator may be assigned and a mutually convenient date can be scheduled for the IA interrogation, which would include my presence in person, or by phone. As you should know, pursuant to §112.532(1)(i), Officer Serianni is clearly and expressly entitled to representation because of being under investigation. Once again, we will be in touch within the next two (2) weeks with a statement setting forth all of our client's potential claims against the City and, potentially, Chief Julie Williams in her individual capacity.

Please feel free to contact me if you desire to discuss these issues. Thank you in advance for your anticipated professional courtesy and cooperation in these matters.

Very truly yours,



Gary D. Wilson

cc: Andrea Flynn Mogensen, P.A.
Isaac Turner, City Manager
Julie Williams, Chief of Police
Alan Bullock, Director of Administrative Services
Ed Martin, Mayor, City of Venice
Ernie Zavodnyik, Vice Mayor
Jim Bennett, Council Member
Emilio Carlesimo, Council Member
Sue Lang, Council Member
Kit McKeon, Council Member
John K. Moore, Council Member
Demitri N. Serianni