



Florida Department of
Law Enforcement

Gerald M. Bailey
Commissioner

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Alex Sink, *Chief Financial Officer*
Charles H. Bronson, *Commissioner of Agriculture*

May 10, 2010

Mr. George Castrataro, P.A.
Attorney at Law
800 N.E. 26th Street
Wilton Manors, Florida 33305

Subject: Criminal Justice Standards and Training Commission v. Michael Verdugo,
Agency Case No.28071

Dear Mr. Castrataro:

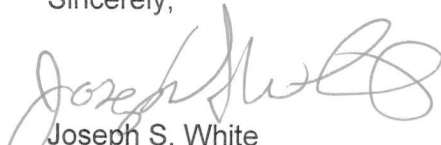
I am writing concerning the above-noted case. Given the totality of circumstances presented in this matter, I am willing to recommend a settlement of the case that would call for a thirty-day prospective suspension of Mr. Verdugo's certification. I would further recommend a one-year period of probation. As a special condition of the probation, Mr. Verdugo would be required to submit documentation demonstrating his completion of Commission-approved ethics training, prior to the end of the probationary period.

The settlement would have to be approved by the Criminal Justice Standards and Training Commission at a public meeting. The Commission has the discretion to accept a settlement proposal or to reject the settlement. If the settlement were rejected, the case would then proceed to formal hearing at a later date before an administrative law judge.

Enclosed is a draft settlement agreement that could be utilized in this case. If you and your client are in agreement with the terms of the settlement, please execute the document and fax a copy to me before close of business Tuesday, May 25, 2010, if possible. Kindly fax a copy of the signed agreement to (850) 410-7691. Should you have any questions, please feel free to contact me at my office at (850) 410-7688.

Thank you for your courtesy in this matter.

Sincerely,



Joseph S. White
Assistant General Counsel

Enclosure

**STATE OF FLORIDA
CRIMINAL JUSTICE STANDARDS AND TRAINING
COMMISSION**

**CRIMINAL JUSTICE STANDARDS
AND TRAINING COMMISSION,**

Petitioner,

vs.

**CASE NO.: 28071
CERTIFICATE NO.: 187849**

MICHAEL VERDUGO,

Respondent.

_____ /

STIPULATION AND SETTLEMENT AGREEMENT

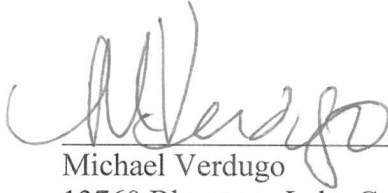
COMES NOW, the Petitioner, Criminal Justice Standards and Training Commission, by and through the undersigned Assistant General Counsel, the Respondent, Michael Verdugo, and enter into the following Stipulation and Settlement Agreement pursuant to Section 120.57(4), Florida Statutes, as the final resolution of this cause, subject to ratification and adoption by the Criminal Justice Standards and Training Commission. The Terms of this agreement are as follows:

1. The Respondent maintains his denial of the charges set forth in the administrative Complaint and does not, by entry into this Stipulation and Settlement Agreement, admit the allegations of misconduct set forth in the Administrative Complaint filed herein, but agrees to the terms of this agreement in order to finally dispose of this case.
2. The Respondent agrees as a condition of settlement of this cause to a thirty-day prospective suspension of certification to commence fifteen days after the entry of the Final Order and continue for thirty days thereafter.
3. The Respondent agrees to a one-year period of probation. The one-year period of probation shall commence upon the conclusion of the thirty-day prospective suspension

and continue for one year thereafter. The staff of the Criminal Justice Professionalism Program, Florida Department of Law Enforcement, shall monitor the probation.

4. As a condition of probation, the Respondent shall provide staff with proof of successful completion of Commission-approved ethics training, prior to the end of the probationary period.
5. As a further condition of probation, the Respondent shall not violate any provision of Section 943.13, Florida Statutes, or Chapter 11B-27, Florida Administrative Code.
6. The Respondent shall, during the term of probation, advise the staff, in writing, of any change of address, telephone number and/or employment.
7. The undersigned Assistant General Counsel or assignee agrees to recommend that the Criminal Justice Standards and Training Commission adopt this Stipulation and Settlement Agreement as the final disposition of this matter.
8. Both parties understand that this proposed settlement is not final until the Commission has approved and adopted it as the final disposition of this case. The parties further understand that if the Commission does not approve and adopt this agreement, the case can then proceed to formal hearing as originally requested by the Respondent, unless the parties agree otherwise.

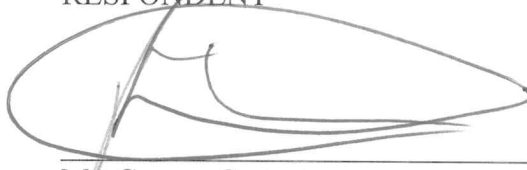
Respectfully submitted,



Joseph S. White
Assistant General Counsel
Florida Department of Law Enforcement
Post Office Box 1489
Tallahassee, Florida 32302-1489
(850) 410-7688
Florida Bar No. 326143

Michael Verdugo
13760 Bluestone Lake Court
Davie, Florida 33325

RESPONDENT



COUNSEL FOR PETITIONER

Mr. George Castrataro
Attorney at Law
800 N.E. 26th Street
Wilton Manors, Florida 33305
Florida Bar No. 27575
954-573-1444

COUNSEL FOR RESPONDENT

STATE OF FLORIDA
COUNTY OF Broward

BEFORE ME, the undersigned authority, this day personally appeared the Respondent, Michael Verdugo, who is personally known to me or who has produced the following identification: Florida Driver License, and who being first duly sworn states that he has read the foregoing Stipulation and Settlement agreement and that he knowingly and voluntarily enters into this Agreement.

SWORN AND SUBSCRIBED before me this 17th day of May, 2010.



NOTARY PUBLIC

