UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division

Case No. 03-20161-CIV-KING/GARBER

MARIE JEANNE JEAN, in her individual capacity, and as parent and legal guardian for minors VLADIMY PIERRE and MICHELDA PIERRE, and LEXIUSTE CAJUSTE,

Plaintiffs,

v.

CARL DORÉLIEN,

Defendant.

_____/

PLAINTIFFS' MOTION *IN LIMINE* AND INCORPORATED MEMORANDUM OF LAW TO EXCLUDE ANY REFERENCES TO, OR EVIDENCE OF PLAINTIFF MARIE JEANNE JEAN'S HAITIAN OR FLORIDA JUDGMENTS

Plaintiffs Marie Jeanne Jean, in her individual capacity, and as legal guardian for minors Vladimy Pierre and Michelda Pierre, and Lexiuste Cajuste (collectively "Plaintiffs") respectfully move this Court for the entry of an order prohibiting the presentation to the jury of any evidence regarding or any references to the existence of Plaintiff Marie Jeanne Jean's Haitian and Florida judgments against Defendant Carl Dorélien.[1]

[1] Plaintiffs recognize that this Court's Order Continuing Trial, dated June 13, 2006 [DE # 122] set a deadline of December 4, 2006 for the filing of all motions, including motions *in limine*. Plaintiffs, however, had no notice of Defendant's intent to present evidence *to the jury* regarding the existence of the Haitian Judgment until January 12, 2007, when Defendant filed his Rule 26 disclosures [DE # 128]. In his disclosures Defendant declared, for the first time, his intention to present "the records of proceedings in Haiti and the translations thereof previously provided to or by the Plaintiffs in the related state court litigation" to the jury in this case. In fact, until January 12, 2007 – less than one-and-a-half months before trial – Plaintiffs had received no discovery responses at all from Defendant and therefore had no indication that Defendant would seek to

On March 12, 2004, Plaintiffs filed their Second Amended Complaint [DE # 37] seeking compensatory and punitive damages against Defendant under the Alien Tort Claims Act ("ATCA"), 28 U.S.C. § 1350, and the Torture Victim Protection Act ("TVPA"), 28 U.S.C. § 1350 note, Pub. L. No. 102-256 (1992), for Defendant's responsibility for the extrajudicial killing of decedent Michel Pierre and the infliction of torture, arbitrary detention, and cruel, inhuman or degrading treatment on Plaintiff Lexiuste Cajuste.

Defendant's Answer, Affirmative Defenses, and Counterclaims (hereinafter "Answer"), filed April 1, 2004 [DE # 56], contains the affirmative defense of "*Res judicata*, Estoppel by Judgment" wherein Defendant asserts that Plaintiffs' claims were previously litigated in Haiti and that Plaintiffs have already obtained a civil judgment against him there. (*See* Answer ¶14.) Plaintiffs have always expected that this issue would be tried to the Court, not to a jury; however, Defendant has recently indicated that he may attempt to present this defense to the jury.

1. The Haitian and Florida Judgments

The Haitian civil judgment to which Defendant refers was issued on November 16, 2000 by the Court of First Instance of Gonaïves in Haiti (the "Haitian Judgment"). The Haitian court entered a judgment holding Defendant and others jointly and severally liable for damages in the amount of 1 billion *gourdes* (which roughly amounts to $26 million U.S. Dollars given current exchange rates) based upon their responsibility for multiple killings in the neighborhood of

---

present this defense. Indeed, Plaintiffs received Defendant's Rule 26 disclosures only after Magistrate Judge Garber granted Plaintiffs' Motion to Compel. Accordingly, Plaintiffs respectfully request leave to file the instant motion beyond the time permitted by this Court's Pretrial Order. In light of S.D. Fla. L.R. 16.1(J), which permits the filing of motions *in limine* up until five days prior to the pretrial conference, Plaintiffs respectfully submit that Defendant will not be prejudiced by this motion. The pretrial conference in this case is scheduled for February 2, 2007. (*See* Order Continuing Trial [DE # 122].) Thus, under S.D. Fla. L.R. 16.1(J), motions *in limine* would typically be due on or before Friday, January 26, 2007 (i.e., the date of filing of this motion).

Raboteau, including the killing of Michel Pierre, the husband of Plaintiff Marie Jeanne Jean and the father of Vladimy and Michelda Pierre.

In June 2004, Plaintiff Marie Jeanne Jean filed an application with the Circuit Court of the Second Judicial Circuit in and for Leon County (the "Circuit Court") requesting recognition of the Haitian Judgment pursuant to Florida's Uniform Out-of-Country Foreign Money Judgment Recognition Act. (*See* Exhibit A, Letter dated June 21, 2004, from Holland & Knight LLP to Clerk of the Circuit Court, enclosing Haitian Judgment.)

On December 3, 2004, the Circuit Court entered its Order Recognizing Foreign Judgment (the "Florida Judgment"). (*See* Exhibit B, Order Recognizing Foreign Judgment.) Pursuant to the Florida Judgment, the Haitian Judgment is recognized and is now enforceable in Florida in the same manner as a judgment of the Circuit Court. (*Id.*, at ¶ 4.)

Subsequently, at an evidentiary hearing on July 12, 2006, Defendant sought to vacate the Florida Judgment by proffering to the Circuit Court a purported order of the Court of First Instance of Gonaïves, purportedly setting aside the Haitian Judgment. (*See* Exhibit C, Transcript of hearing before the Honorable Janet E. Ferris, Circuit Court Judge, in Tallahassee, on July 12, 2006.) After considering the evidence, including the testimony of the parties' expert witnesses, the Circuit Court issued its August 17, 2006, Order Granting Marie Jeanne Jean's Renewed Motion for Enforcement of Money Judgment and Denying Dorélien's Motion for Relief from Judgment. (*See* Exhibit D, August 17, 2006 Order). Significantly, the Circuit Court found Defendant's purported order of the Gonaïves court, purporting to vacate the Haitian Judgment, was a "most irregular document." (*Id.*, at p. 3.) Moreover, the Circuit Court specifically disagreed with the assertions of Defendant's expert witness, Mr. Duplan, and did not find his testimony persuasive. (*Id.*, at pp. 2-3.) Accordingly, the Florida Judgment remains enforceable

against Defendant. Defendant has appealed the Circuit Court's August 17, 2006 Order.[2] *See Dorelien v. Jean*, Case No. 1D06-4806, Florida First District Court of Appeal.

2. Defendant intends to confuse the jury with his *res judicata* defense

On January 12, 2007, Defendant filed his Rule 26 disclosures [DE # 128] wherein he declared, for the first time, his intention to submit to the jury "the records of proceedings in Haiti and the translation thereof previously provided to or by the Plaintiff in the related state court litigation." (Defendant's Rule 26 Disclosure [DE #128], at p. 1) Plaintiffs are concerned that Defendant may attempt to introduce the "irregular document" and others that the Circuit Court has already found unpersuasive.[3] Although Defendant subsequently stipulated that he will not be proffering any witness testimony or documents at trial (*see* Joint Pretrial Stipulation [DE # 134], at pp. 9-10), Plaintiffs are concerned that Defendant may nonetheless refer to the Haitian Judgment and/or the Florida Judgment during his opening statement and during his cross examination of Plaintiffs' witnesses.

Evidence of and references to the Haitian and Florida judgments would only obscure the

---

[2] The parties filed their Joint Motion for Stay [DE # 123] in part to avoid the possibility of contradictory findings between this Court and the state court on the validity of the Haitian Judgment. The appeal in state court is currently proceeding and should be resolved in the near future. Defendant's opening brief was due on January 24, 2007, although it has not yet been filed. Plaintiffs' response is due 20 days after the submission of Defendant's brief.

[3] Defendant is making factual arguments in this Court and in the state courts which are flatly contradictory. In the state court, Defendant argued (and continues to argue on appeal) that the Haitian Judgment has been set aside, and that the Florida Judgment must therefore be vacated. Here Defendant argues that the Haitian Judgment is final and precludes this lawsuit. Defendant is caught in a factual contradiction. He cannot have it both ways. Plaintiffs Marie Jeanne Jean, Vladimy Pierre and Michelda Pierre acknowledge that introduction of evidence about the Haitian Judgment is actually favorable to them because the Gonaïves court found Defendant liable for the murder of Michel Pierre. Nonetheless, Plaintiffs seek to exclude such evidence because it is confusing to the jury, will distract from the real issues of liability and will improperly provide Defendant yet another forum in which to present his already discredited version of the judicial proceedings in Haiti.

liability issues set for trial in this case by diverting the jury's attention away from the factual issues relating to Defendant's responsibility for the Raboteau Massacre to the validity of the Haitian Judgment and the ongoing state court litigation relating to the Florida Judgment.

Further, as explained below, it is settled law that *res judicata* and collateral estoppel are threshold legal issues that must be decided by this Court prior to trial and, thus, cannot be reached by the jury during trial. Thus, evidence of and references to the Haitian and Florida Judgments and the proceedings in those courts should be excluded.

Defendant may also try to relitigate the issue of exhaustion of remedies and thereby bring in through the back door evidence of the Haitian Judgment. However, Defendant's affirmative defense of exhaustion is arguably moot. Defendant agrees that the Eleventh Circuit already held that exhaustion of remedies is not required under the ATCA, and that Defendant has the burden of proof on the issue under the TVPA. (*See* Joint Pretrial Stipulation [DE # 134], at pp. 2-3.) Although Plaintiffs bring claims of torture and extrajudicial killing under the TVPA, they also bring those claims (and the remainder of their claims) under the ATCA. *Cf. Aldana v. Fresh Del Monte Produce, Inc.*, 416 F.3d 1242, 1251 (11th Cir. 2005) ("Plaintiffs can raise separate claims for state-sponsored torture under the Alien Tort Act and also under the Torture Victim Protection Act.") Therefore, even if the Court were to rule that Marie Jeanne Jean failed to exhaust her remedies in Haiti, none of Plaintiffs' claims would be dismissed.

Moreover, in this case, the Eleventh Circuit found that evidence of the mere existence of the Haitian Judgment was not enough to meet Defendant's burden of proof. *Jean v. Dorelien*, 431 F.3d 776, 782-83 (11th Cir. 2005). Defendant has to prove that the judgment is actually enforceable in Haiti. *Id.* Specifically, the court held that Defendant failed to overcome Plaintiffs' evidence that the chaotic and violent situation in Haiti prevented Marie Jeanne Jean

from successfully enforcing her judgment there. *Id.* Since the Eleventh Circuit issued that ruling and the case was reinstated before this Court, Defendant has not provided even a single piece of evidence to support his burden of proof, nor will he be able to do so at trial because he does not plan to present any witnesses or exhibits. (*See* Joint Pretrial Stipulation [DE # 134], at pp. 9-10.) Therefore, any reference by Defendant to the exhaustion of remedies issue at trial is a further attempt to confuse the jury and distract them from the issue of Defendant's liability.

In the alternative, if the Court feels the need to hear evidence on the defense of *res judicata* or collateral estoppel, Plaintiffs respectfully request that this Court conduct its own pre-trial evidentiary hearing, and that Plaintiffs be given the opportunity to provide briefing if the Court elects to determine the issue *sua sponte* or on any motion by Defendant.[4]

MEMORANDUM OF LAW

I. *Res judicata* and Collateral Estoppel are Threshold Legal Issues that Must be Decided by the Court Before Trial and Cannot be Decided by a Jury During Trial

It is settled law in this Circuit that "[a] district court's conclusions on *res judicata* and collateral estoppel are *conclusions of law*, reviewable de novo by [the Courts of Appeals]." *Manning v. City of Auburn*, 953 F.2d 1355, 1358 (11th Cir. 1992) (citing *Richardson v. Alabama State Bd. of Educ.*, 935 F.2d 1240, 1244 (11th Cir. 1991)) (emphasis added); *see also Richardson v. Miller*, 101 F.3d 665, 667-68 (11th Cir. 1996) (reviewing the District Court's legal conclusions as to *res judicata* and collateral estoppel *de novo* and holding that a judicial determination as to whether an issue was actually litigated in a prior action constitutes a "legal

[4] Plaintiffs' counsel has communicated with counsel for the Defendant and has been informed that Defendant intends to file an untimely motion for judgment on the pleadings seeking to dismiss Marie Jeanne Jean's claims based upon the purported *res judicata* effect of the Haitian Judgment. Plaintiffs respectfully request that this Court postpone reaching any decision as to Defendant's out-of-time motion until such time as Plaintiffs have had an opportunity to submit a responsive filing and a subsequent evidentiary hearing can be conducted.

conclusion"). Accordingly, the Eleventh Circuit has held that decisions regarding whether the elements of *res judicata* and/or collateral estoppel have been met must be decided by the Courts as a legal issue, and not by juries as a factual issue. *See Davila v. Delta Air Lines, Inc.*, 326 F.3d 1183, 1187 (11th Cir. 2003) (holding that "[i]n determining whether the prior and present causes of action are the same, *we* [i.e., the Court of Appeals] must decide [on a *de novo* basis] whether the actions arise 'out of the same nucleus of operative fact, or [are] based upon the same factual predicate.'") (quoting *In re Piper Aircraft Corp.*, 244 F.3d 1289, 1297 (11th Cir. 2001)) (emphasis added); *see also First Alabama Bank of Montgomery, N.A. v. Parsons Steel, Inc.*, 825 F.2d 1475, 1478 (11th Cir. 1987) (implicitly approving of underlying state court decision finding that "the issue of *res judicata* is an issue properly to be decided by the Court rather than an issue to be presented to and decided by the jury.").

Other Courts of Appeals have held that *res judicata* and/or collateral estoppel are threshold legal issues "that must be decided *by the court before* there can be any decision on the merits." *Pomeroy v. United States*, No. 98-5041, 1998 WL 670183, at *2 (Fed Cir. Sept. 3, 1998) (citing *Spears v. Merit Sys. Protection Bd.*, 766 F.2d 520 (Fed. Cir. 1985)) (emphasis added). For instance, in *Crowe v. Smith*, No. 94-41205, 1996 WL 101393, at *6 (5th Cir. Feb. 26, 1996), the Fifth Circuit held that "*[b]ecause res judicata and collateral estoppel are issues of law, there were no factual issues for the jury to decide with respect to their applicability.*" (emphasis added). Similarly, in *Winston v. Department of Labor*, No. 96-3245, 1997 WL 138954 at *2 (Fed. Cir. Mar. 27, 1997), the Court held that "[r]es judicata is an issue of law that is not affected by the allocations of burdens of proof."). *See also Hartmann v. Time, Inc.*, 166 F.2d 127, 137 (3d Cir. 1948) (stating in the facts section that "the court made an order directing the pleas of *res judicata* and statute of limitations be determined *in limine*."); *Gonzalez-Pina v. Rodriguez*, 407

F.3d 425, 429 (1st Cir. 2005) (holding that "[r]es judicata is an issue of law over which this court exercises plenary review.") (citing *Pérez-Guzmán v. Gracia,* 346 F.3d 229, 233 (1st Cir. 2003)).

As this legal authority makes clear, any evidence regarding the existence of a prior foreign judgment in Haiti bears only upon the legal issue of *res judicata* and not the factual issues regarding whether Defendant is liable for the acts alleged in Plaintiffs' complaint. Because *res judicata* and collateral estoppel are threshold legal issues that must be decided before trial and, thus, are not properly delegated to a jury, any evidence regarding the Haitian and Florida Judgments would only serve to needlessly confuse the jury beyond the already complex issues to be decided in this case. Accordingly, this Court must enter an order precluding the submission of evidence regarding, or referring to, the Haitian and Florida Judgments.

II. Evidence of the Haitian Judgment Must be Excluded Under Rules 402 and 403 of the Federal Rules of Evidence

In light of the substantial case law establishing that *res judicata* and/or collateral estoppel are threshold legal issues that must be decided by this Court before a trial on the merits, evidence regarding the Haitian and Florida Judgments must be excluded, and references to it prohibited, pursuant to Rules 402 and 403 of the Federal Rules of Evidence.

Evidence regarding the Haitian and Florida Judgments is irrelevant to the Defendant's liability for the acts alleged in the Second Amended Complaint. Accordingly, under Rule 402, evidence of the judgments must be excluded. The fact of the existence of these judgments does not bear on Defendant's responsibility for the abuses suffered by the Plaintiffs. *See e.g. Halladay v. Verschoor*, 381 F.2d 100, 111-12 (8th Cir. 1967) (holding that admission of evidence concerning plaintiff's previous recovery by trust estate constituted reversible error under Rule 402, where such evidence was irrelevant and immaterial to the liability of the defendant).

First, the Haitian and Florida Judgments concern only the killings in Raboteau; the torture of Plaintiff Lexiuste Cajuste was not even addressed in those cases. Therefore, the judgment has no relevance to his claims. Furthermore, Plaintiff Cajuste's claims cannot be barred by *res judicata.* He was not a party to the Haitian and Florida Judgments, and the abuses he suffered were not addressed in those cases. The Eleventh Circuit has repeatedly stated that *res judicata* does not apply unless "the parties were identical in both suits." *Jang v. United Technologies Corp.*, 206 F.3d 1147, 1149 (11th Cir. 2000); *Citibank, N.A. v. Data Lease Fin. Corp.*, 904 F.2d 1498, 1501 (11th Cir. 1990); *In re Justice Oaks II, Ltd.*, 898 F.2d 1544, 1550 (11th Cir. 1990). Accordingly, this Court may not dismiss this lawsuit in its entirety regardless of the Court's disposition as to Ms. Jean's claims.

Second, the existence of a judgment is not a fact that assists the jury in determining whether Defendant is responsible for the murder of Marie Jeanne Jean's husband.[5] The evidence presented at trial will concern the facts of what happened in Raboteau on April 22, 1994. What occurred in a Haitian court six years later does not help prove or refute those facts.

Moreover, even if the Court finds that this evidence has some relevance to these proceedings, it nonetheless must be stricken under Rule 403 as extremely likely to confuse the jury as to the triable issues in this case. Assuming this Court finds that a trial is not barred by *res judicata*, Defendant could not credibly argue that the evidence of the Haitian and Florida Judgments assists him in disproving the liability issues in this case. *See supra.* Accordingly, Defendant would only seek to introduce this evidence to obfuscate the issues in this case, confuse the jury, and distract them from the real issue – whether Defendant is responsible for the

[5] To the extent that the Court believes that it is relevant, the Haitian Judgment is favorable to the Plaintiffs. The Court of First Instance of Gonaïves found Defendant guilty and civilly liable for the killing. If the Haitian Judgment has any preclusive effect, it determined that Defendant was responsible for the murder of Marie Jeanne Jean's husband. *See supra.*

abuses alleged.

Rule 403 is specifically intended to avoid the admission of evidence into the record in scenarios such as the one just described. For instance, Courts have consistently refused to admit the previous decisions of arbitrators in cases where their decisions ultimately have no bearing on the liability issues in the district court case and would unnecessarily confuse the jury. *See e.g. Rubens v. Mason*, 387 F.3d 183 (2d Cir. 2004) (excluding affidavit of arbitrator in previously arbitrated products liability case so as to not prejudice finding of liability in subsequent legal malpractice case); *Rachel v. Consolidated Rail Corp.*, 891 F.Supp. 428, 431 (N.D. Ohio 1995) (excluding evidence in liability case concerning arbitrator's previous decision that railroad company violated terms of collective bargaining agreement). Similarly, in *Metrix Warehouse, Inc. v. Daimler-Benz AG*, 555 F. Supp. 824, 826 (D. Md. 1983), the Court held that Rule 403 barred defendants in a private antitrust suit from introducing a consent decree entered in a prior antitrust case. Finally, in *Yellow Bayou Plantation, Inc. v. Shell Chemical, Inc.*, 491 F.2d 1239, 1242-43 (5th Cir. 1974), the Court upheld the exclusion of evidence regarding past lawsuits as having faint probative value as to liability and having high potential for unfair prejudice. *See also Century Wrecker Corp. v. E.R. Buske Mfg. Co., Inc.*, 898 F. Supp. 1334, 1344 (N.D. Iowa 1995) (holding that the probative value of the fact that the trial court had previously ruled, in a summary judgment motion, that patents were infringed, was outweighed by its prejudicial effect).

Admission of evidence concerning the Haitian Judgment would merely cause needless confusion to the jury regarding an issue that should already have been decided by this Court prior to trial and has already been resolved by the Second Judicial Circuit Court. Therefore, admission of evidence about, and references to, the Haitian and Florida Judgments should be prohibited at

trial.

III. In the Alternative, Evidence Regarding the Haitian and Florida Judgments Should Only be Admitted Within the Context of a Pretrial Evidentiary Hearing Before the Court Regarding the Applicability of *Res judicata* and/or Collateral Estoppel in this Case

Even if this Court believes that decisions regarding *res judicata* and/or collateral estoppel entail some degree of fact-finding, Plaintiffs respectfully request that this Court conduct such fact-finding within the context of a pretrial evidentiary hearing and not during the jury trial. As stated above, Courts have held that *res judicata* and collateral estoppel are threshold issues that must be decided prior to adjudicating the merits of the case before the jury. *See Pomeroy v. United States*, No. 98-5041, 1998 WL 670183, at *2 (Fed Cir. Sept. 3, 1998) (citing *Spears v. Merit Sys. Protection Bd.*, 766 F.2d 520 (Fed. Cir. 1985)); *Crowe v. Smith*, No. 94-41205, 1996 WL 101393, at *6 (5th Cir. Feb. 26, 1996). Accordingly, there is no occasion that should require the jury to consider the validity or existence of the Haitian and Florida Judgments in order to decide the merits of Plaintiffs' case.

CONCLUSION

In light of the above cited legal authority, the issue of whether Plaintiffs' claims are barred by *res judicata* is a complicated legal issue that must be decided by this Court prior to any trial on the merits. Assuming this Court decides the issue of *res judicata* before trial, the only remaining matters for the jury will pertain to Defendant's liability for the actions alleged in Plaintiffs' complaint. As such, any presentation of evidence to the jury regarding foreign judgments would needlessly confuse these already complicated proceedings and would unfairly prejudice Plaintiffs without adding any probative evidence as to Defendant's liability for the actions alleged in Plaintiffs' complaint. Accordingly, for the reasons stated herein, Plaintiffs respectfully request the entry of an order prohibiting the submission of evidence or references to

the jury regarding the Haitian Judgment or the Florida Judgment, and such other relief as this Court may deem just.

Dated: January 26, 2007

Respectfully submitted,

s\Dwayne E. Williams
HOLLAND & KNIGHT, LLP
Dwayne E. Williams, Esq.
(Fla. Bar. No. 0125199)
701 Brickell Avenue, Suite 3000
Miami, Florida 33131
Tel: (305) 374-8500
Fax: (305) 789-7799
Email: dwayne.williams@hklaw.com

THE CENTER FOR JUSTICE & ACCOUNTABILITY
Matthew Eisenbrandt, Esq.
*(*Admitted *Pro Hac Vice)*
870 Market Street, Suite 684
San Francisco, California 94102
Tel: (415) 544-0444
Fax: (415) 544-0456
Email: meisenbrandt@cja.org

TANNER BISHOP
Thomas E. Bishop, Esq.
(Florida Bar No. 0956236)
One Independent Drive, Suite 1700
Jacksonville, Florida 32202
Tel: (904) 598-0034
Fax: (904) 598-0395
Email: tbishop@tannerbishoplaw.com

John Andres Thornton, Esq.
(Florida Bar No. 0004820)
100 SE 2nd Street, Suite 2700
Miami, Florida 33131
Tel: (305) 532-6851
Fax: (305) 532-6851
Email: johnandresthornton@hotmail.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division

Case No. 03-20161-CIV-KING/GARBER

MARIE JEANNE JEAN, in her individual capacity, and as parent and legal guardian for minors VLADIMY PIERRE and MICHELDA PIERRE, and LEXIUSTE CAJUSTE,

Plaintiffs,

v.

CARL DORÉLIEN,

Defendant.

_____/

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 26, 2007, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel or record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filings generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s\Dwayne E. Williams
Dwayne E. Williams

SERVICE LIST

Case No. 03-20161-CIV-KING/Garber
United States District Court Southern District Of Florida
Miami Division

Kurt R. Klaus, Jr., Esq.
Law Offices of Kurt R. Klaus, Jr.
Suite 120, South Dade Two
10720 Caribbean Boulevard
Miami, FL 33189

4325196_v1