

South Florida Reception Center  
on 7-1-15 for mailing.  
I/M initials [Signature]

United States District Court  
Southern District of Florida

Case No.: 12-cv-22958-Seitz

FILED by PG D.C.  
JUL 09 2015  
STEVEN M. LARIMORE  
CLERK U. S. DIST. CT.  
S. D. of FLA. - MIAMI

United States, :  
Plaintiff, :

Complaint for Interpleader

V

And

Secretary, Florida :  
Department of Corrections, :  
Defendant. :

Joinder of Claims

COMES NOW, Jeffrey Levine ("Levine"), pro se and files this Complaint for Interpleader and Joinder of claims pursuant to Federal Rules of Civil Procedure Rules 18 and 20, and avers:

Levine has standing to participate and join the Plaintiff, United States, as an interested party whose First Amendment rights and his RLUIPA protections are currently at issue in the above styled case. To the extent that a final ruling that issues from this Court will substantially either grant or limit Levine's right to express his religious beliefs pursuant thereto, Levine respectfully moves this Honorable Court to take judicial notice of the following:

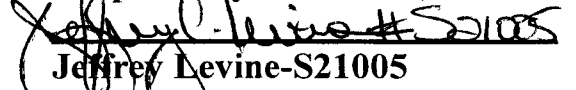
1. The ruling that issues from this Court must recognize that the rights granted by the First Amendment and the RLUIPA extend beyond the provision of Kosher food and include the mandated preparation, handling and appropriate environment for consumption of the Kosher food product.
2. The agreement defining the foods that may be served in order to comply with RLUIPA must also clarify and assert that those foods must also be in full compliance with the minimum dietary requirements of the Department of Health and Rehabilitative Services Standard as well as the recommended

dietary allowances of the National Research Council, National Academy of Sciences, pursuant to Chapter-6 Food of Florida Model Jail Standard/Florida Administrative Code.

To the extent that the decision in DeHart v. Horn, 227 F.3d 47, 55 (Third District Court of Appeal Cir. 2000) could imply that the provision of an all-cold Kosher diet alone, without regard to the minimum dietary requirements prescribed in the above noted regulations such a religious diet cannot be deemed to be compliant with RLUIPA.

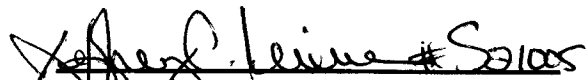
Equal protection requires that participants in a religious diet program should not be otherwise disadvantaged due to their electing to practice their religious beliefs.

Respectfully submitted,

  
Jeffrey Levine-S21005  
South Florida Reception Center  
South Unit  
13910 N.W. 41<sup>st</sup> Street  
Doral, Florida 33178-3014

**ALTERNATIVE OATH**

I hereby swear, under penalty of perjury, that I have read the foregoing Complaint for Interpleader and Joinder of Claims and that all of the facts and assertions contained therein are true and correct.

  
Jeffrey Levine-S21005

**CERTIFICATE OF SERVICE**

I hereby certify that I have provided a true and correct copy of the foregoing Complaint for Interpleader and Joinder of Claims by U.S. Mail on this 15 day of July, 2015 to the following:

Office of the Atty General  
for the State of Florida  
The Capital  
Tallahassee, Florida 32399-1050

United States Atty General  
950 Pennsylvania Ave, NW  
Washington, DC 20530

Attn: Deena S. Fox

~~Stephen C. Levine #521005~~  
STEPHEN C. LEVINE  
SFC South Unit 2117  
13910 N.W. 41<sup>st</sup> Street  
Doral, Florida 33178

CC: Case No.: 1-15-cv-22136-JAL #7

~~200 New Orleans #501005~~  
South Florida Reception Center  
South Dist D1117  
13910 N.W. 41~~st~~ Street  
Doral, Florida 33178

USMS

INSPECTED

MAILED FROM

Hastler

07/01/2015

RECEIVED

09 20 11:53 AM  
482



07/01/2015  
09 20 11:53 AM  
482

Legal Mail

Clark of Courts Southern Dist. of Fla.  
United States District Court  
Office of the Clerk Room 8209  
400 North Miami Avenue  
Miami, Florida 33138-7716