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FORT LAUDERDALE OFFICE  
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Fort Lauderdale, FL 33301

REPLY TO: Miami

May 24, 2019

Dudley Goodlette, Special Master  
Suite 409, The Capitol  
404 S Monroe Street  
Tallahassee, FL 32399-1100  
Goodlette.dudley@flsenate.gov

Re: Scott Israel  
Executive Order of Suspension, Executive Order No. 19-14  
Sheriff Israel's Annotated Subpoena List for Witnesses

Dear Special Master Goodlette:

In compliance with your May 21, 2019 letter, Sheriff Israel submits this annotated chart identifying the contact information for the witnesses for whom subpoenas should be issued by the Senate. Due to the requirements of a case deposition and family travel, I was slightly delayed in providing this information, and request leave for the unintended late submission. Also, I am in the process of discussing available dates and times with counsel for the Governor for possible witness depositions, but have been unable as yet to effect that communication due to my scheduling conflicts at the present time.

**WITNESS SUBPOENAS REQUESTED**

Kevin Bartlett, Captain, Broward Sheriff's Office, <b>2601 West Broward Blvd, Fort Lauderdale,</b>	Testimony concerning BSO Fire Rescue protocol and response applicable to Fort Lauderdale Hollywood Airport and Marjory Stoneman Douglas High School at times pertinent to	<b>Subpoena requested</b>	<b>Deposition is possible pending discussions with counsel</b>
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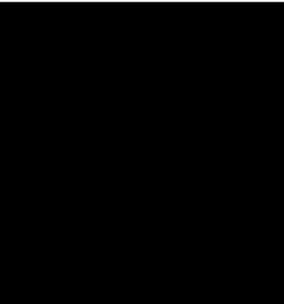
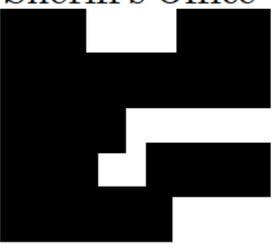
<b>FL 33312</b>	incidents		
<del>Angelo Cedeno, Major, Broward Sheriff's Office</del>	<del>Participated in preparation of BSO After Action report for Fort Lauderdale-Hollywood Airport shooting incident</del>	<b>Removed</b>	
John Curcio, Detective, Broward Sheriff's Office, <b>2601 West Broward Blvd, Fort Lauderdale, FL 33312</b>	Participant in BSO response to Fort Lauderdale-Hollywood Airport shooting incident and ; Marjory Stoneman Douglas High School shooting incident, including preparation for active shooter response	<b>Subpoena requested</b>	<b>Deposition is possible pending discussions with counsel</b>
Jack Dale, former Colonel, Broward Sheriff's Office  <b>jdd1199@yahoo.com</b>	Knowledge of BSO protocols, policies, and procedures for active shooter situations, including BSO presence at and response to Fort Lauderdale-Hollywood Shooting Incident and Marjory Stoneman Douglas High School Shooting incidents	<b>Subpoena requested</b>	<b>Deposition is possible pending discussions with counsel</b>
Ron DeSantis, Governor	Personal knowledge of suspension decision of Sheriff Israel	<b>Subpoena requested</b>	<b>Subpoena Refused by Senate President</b>
James Diefenbacher, Captain, Broward Sheriff's Office, <b>2601 West Broward Blvd, Fort Lauderdale,</b>	Participated in preparation of BSO After Action report for Fort Lauderdale-Hollywood Airport shooting incident. Knowledge of BSO certification and accreditation	<b>Subpoena requested</b>	<b>Deposition is possible pending discussions with counsel</b>

<b>FL 33312</b>			
Michael Dimaggio, former Lt. Colonel, Broward Sheriff's Office, 	Former SWAT Commander and in charge of Criminal Investigations. Knowledge of BSO response to Fort Lauderdale-Hollywood Airport and Marjory Stoneman Douglas High School shooting incidents. Oversaw creation of and coordination with Broward County Schools Real Time Crime Center (RTCC)	<b>Subpoena requested</b>	<b>Deposition is possible pending discussions with counsel</b>
<del>Robert Furman, Broward Sheriff's Office</del>	<del>Knowledge of Fort Lauderdale Hollywood Airport shooting incident</del>	<b>Removed</b>	
Steve Geller, Commissioner, Broward County, Geller Law Firm, PA, 110 E Broward Blvd Ste 1700 Fort Lauderdale, FL 33301-3500 Tel: 954-315-3926 steve@gellerlawfirm.com	Knowledge of Broward County regional communications system, coordination with users (including BSO), and implementation of improvements to system	<b>Subpoena requested</b>	<b>Deposition is likely pending discussions with counsel</b>
Edward Grant, retired Lt. Colonel,	Former SWAT Commander present at Fort Lauderdale-	<b>Subpoena requested</b>	<b>Deposition is possible pending</b>

<p>Broward Sheriff's Office</p> 	<p>Hollywood Airport shooting incident and interacted with other responding law enforcement officers and agencies. Knowledge of Marjory Stoneman Douglas High School shooting incident.</p>		<p><b>discussions with counsel</b></p>
<p>Scott Israel, Broward County Sheriff, C/O Benedict P. Kuehne, Kuehne Davis Law, P.A., 100 S.E. 2 Street, Suite 3550, Miami, FL 33131</p>	<p>All aspects of suspension</p>		<p><b>Live appearance</b></p>
<p>Stephen Kinsey, former Undersheriff, Broward County Sheriff's Office</p> 	<p>Knowledge of BSO response to and involvement at Fort Lauderdale-Hollywood Airport and Marjory Stoneman Douglas High School shooting incidents. Oversight of NIMS Training at BSO.</p>	<p><b>Subpoena requested</b></p>	<p><b>Deposition is possible pending discussions with counsel</b></p>
<p>Jesse Madrigal, Deputy Sheriff, Broward Sheriff's Office, 2601 West Broward Blvd, Fort Lauderdale, FL 33312</p>	<p>Personal participation in Fort Lauderdale-Hollywood Airport shooting incident and apprehension of terrorist perpetrator. Recipient of 2018 Deputy of the Year by the Florida Sheriffs Association for his</p>	<p><b>Subpoena requested</b></p>	<p><b>Deposition is possible pending discussions with counsel</b></p>

	heroism in the line of duty.		
Angela Mize, Broward Sheriff's Office, Acting Director, Regional Communications, <b>2601 West Broward Blvd, Fort Lauderdale, FL 33312</b>	Knowledge of BSO regional communications in use at time of Fort Lauderdale-Hollywood Airport and Marjory Stoneman Douglas High School shooting incidents, including system limitations, workarounds needed as result of Broward County ongoing efforts to upgrade the regional communications system.	<b>Subpoena requested</b>	<b>Deposition is possible pending discussions with counsel</b>
Mel Murphy, Deputy Sheriff, Broward Sheriff's Office, <b>2601 West Broward Blvd, Fort Lauderdale, FL 33312</b>	BSO Trainer with knowledge of training and protocols in place at the time of the Fort Lauderdale-Hollywood Airport and Marjory Stoneman Douglas High School shooting incidents	<b>Subpoena requested</b>	<b>Deposition is possible pending discussions with counsel</b>
<b>Nathan Osgood, Retired Major, Broward Sheriff's Office NEW WITNESS ADDED</b>	Participation in BSO active shooter/killer training received during time preceding incidents, including scope of training and knowledge of required practices, including impact of BSO Active Shooter policy and protocol in effect at time of incidents		<b>Deposition is possible pending discussions with counsel</b>
Representative to _____ be determined	<del>Knowledge of Marjory Stoneman Douglas High School Public Safety Commission</del>	<b>Removed</b>	

	investigation, witness identification, and decisions		
Representative to be determined	Knowledge of Broward County regional communications system, coordination with users (including BSO), and implementation of improvements to system as it pertains to the activities of the Broward County Consolidated Communications Committee	<b>Removed</b>	
Robert Payton, former City Manager, Parkland, Florida	Knowledge of Marjory Stoneman Douglas High School shooting incident and the law enforcement staffing at the school in consideration of the operating agreement with Broward Sheriff's Office	<b>Removed</b>	
<b>George Piro, Federal Bureau of Investigation, Special Agent in Charge, Miami Field Office, 2030 SW 145 Avenue, Miramar, FL 33027</b>	FBI Special Agent in Charge at time of Fort Lauderdale-Hollywood Airport shooting incident, and knowledge of inter-agency law enforcement coordination	<b>Subpoena requested</b>	<b>Deposition is possible pending discussions with counsel</b>
James Polan, former Colonel, Broward	Knowledge of Fort Lauderdale-Hollywood Airport and Marjory	<b>Subpoena requested</b>	<b>Deposition is possible pending</b>

<p>Sheriff's Office  </p>	<p>Stoneman Douglas High School shooting incidents, including post-shooting assessment and response</p>		<p><b>discussions with counsel</b></p>
<p>Robert Pusins, former Executive Director, Broward Sheriff's Office,  </p>	<p>Knowledge of BSO Policies, Procedures, and Practices, and status of regional communications utilized by BSO and Broward County law enforcement agencies at the time of the subject incidents</p>	<p><b>Subpoena requested</b></p>	<p><b>Deposition is possible pending discussions with counsel</b></p>
<p>Steve Robson, Major, Broward Sheriff's Office, <b>2601 West Broward Blvd, Fort Lauderdale, FL 33312</b></p>	<p>Knowledge and supervision of BSO response to both Fort Lauderdale-Hollywood Airport and Marjory Stoneman Douglas High School shooting incidents, including training protocols, practices, and involvement at time of the incidents</p>	<p><b>Subpoena requested</b></p>	<p><b>Deposition is possible pending discussions with counsel</b></p>
<p>Kevin Shults, Retired Major, Broward Sheriff's Office  </p>	<p>Participant in Fort Lauderdale-Hollywood Airport and Marjory Stoneman Douglas High School shooting incidents, and knowledge of active shooter training at BSO, including implementation at time of the incidents</p>	<p><b>Subpoena requested</b></p>	<p><b>Deposition is possible pending discussions with counsel</b></p>

<p>Lisa Zarazinski, Broward Sheriff's Office, Former Director, Regional Communications, <b>2601 West Broward Blvd, Fort Lauderdale, FL 33312</b></p>	<p>Responsibility for BSO regional communications in use at time of Fort Lauderdale-Hollywood Airport and Marjory Stoneman Douglas High School shooting incidents, with particular knowledge of Broward County efforts to improve and upgrade the communications system that is under the County's control, and the impact on all law enforcement agencies in the County</p>	<p><b>Subpoena requested</b></p>	<p><b>Deposition is possible pending discussions with counsel</b></p>
<p>Any person deposed in this proceeding.</p>			
<p>Any person listed by other parties in this proceeding.</p>			
<p>Any persons called as witnesses by other parties in this proceeding.</p>			
<p>Any person who may be necessary to authenticate documents or testify regarding hearsay or</p>			

other objections.			
Any rebuttal and/or impeachment witnesses.			<b>No rebuttal witnesses known</b>

Respectfully submitted,

*Benedict P. Kuehne*

**BENEDICT P. KUEHNE  
STUART N. KAPLAN**

Copy:

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