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REPLY TO: Miami

June 10, 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  
Trial Witnesses for Subpoena Issuance  
Clarification of Exhibit List (Bates Numbered)

Dear Special Master Goodlette:

In accordance with the instructions during this morning Pre-Hearing Conference, Sheriff Israel requests the issuance of these trial subpoenas for the potential attendance of these witnesses commencing June 18, 2019, at 9 a.m.:

- Jack Dale, [REDACTED]
- Robert Pusins, 171 SE 14 Street, Pompano Beach, FL 33060
- George Piro, Special Agent in Charge, Federal Bureau of Investigations, 2030 SW 145 Avenue, Miramar, FL 33302
- John Curcio, Broward Sheriff's Office, 2601 West Broward Blvd, Fort Lauderdale, FL 33312

As will be more fully articulated in a Memorandum to be submitted tomorrow on the impact of the Scot Peterson arrest and prosecution, it appears likely that Sheriff Israel will learn of a number of previously unknown and unidentified material witnesses and evidence possessed by the Executive Branch in connection with the related criminal investigation of former BSO Deputy Peterson. Sheriff Israel and his legal team have been working industriously since last week's public revelation

of the charges to ascertain the case-impacting information gathered by Inspector Keith B. Riddick of the FDLE Office of Executive Investigations Public Corruption Unit. As soon as Sheriff Israel is able to fully articulate specific witnesses by name and documents by description, Sheriff Israel will present his supplemental list of witnesses and exhibits needed to protect his fundamental right to due process in these proceedings.

Also, Sheriff Israel clarifies that his Exhibit 25 (SaferWatch App) is being accessed and will be made a part of the Exhibit DropBox tonight. Exhibit 27 (Scott Peterson's Today Show interview) is accessible at: <https://www.today.com/video/parkland-officer-scot-peterson-i-never-thought-of-being-scared-1248443459562>, and will be added to the DropBox.

Respectfully submitted,



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

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