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FORT LAUDERDALE OFFICE
1 W. Las Olas Blvd., Suite 500
Fort Lauderdale, FL 33301

REPLY TO: Miami

June 3, 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 Updated Witness Subpoena Requests



Dear Special Master Goodlette:


In compliance with your May 31, 2019 letter, Sheriff Israel submits this updated chart identifying the deposition subpoenas to be issued, as well as a limited number of trial subpoenas needed. The scheduling of some witness depositions is still being arranged based on the joint availability of counsel for the parties.

WITNESS SUBPOENAS REQUESTED

Kevin Bartlett, Captain, Broward Sheriff's Office, 2601 West Broward Blvd, Fort Lauderdale, FL 33312	Testimony concerning BSO Fire Rescue protocol and response applicable to Fort Lauderdale Hollywood Airport and Marjory Stoneman Douglas High School at times pertinent to incidents	Deposition subpoena requested.	Deposition is being coordinated by the BSO General Counsel for a date available to all counsel.
John Curcio, Detective,	Participant in BSO response to Fort	Deposition subpoena	Deposition is scheduled

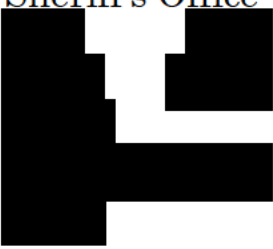
<p>Broward Sheriff's Office, 2601 West Broward Blvd, Fort Lauderdale, FL 33312</p>	<p>Lauderdale-Hollywood Airport shooting incident and ; Marjory Stoneman Douglas High School shooting incident, including preparation for active shooter response</p>	<p>requested.</p>	<p>for June 7, 2019, at a time to be determined.</p>
<p>Jack Dale, former Colonel, Broward Sheriff's Office  jdd1199@yahoo.com</p>	<p>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</p>	<p>Trial Subpoena requested.</p>	<p>Trial subpoena requested.</p>
<p>James Diefenbacher, Captain, Broward Sheriff's Office, 2601 West Broward Blvd, Fort Lauderdale, FL 33312</p>	<p>Participated in preparation of BSO After Action report for Fort Lauderdale-Hollywood Airport shooting incident. Knowledge of BSO certification and accreditation</p>	<p>Deposition subpoena requested.</p>	<p>Deposition is being coordinated by the BSO General Counsel for a date available to all counsel.</p>
<p>Michael Dimaggio, former Lt. Colonel, Broward Sheriff's Office.  </p>	<p>Former SWAT Commander and in charge of Criminal Investigations. Knowledge of BSO response to Fort Lauderdale-</p>	<p>Deposition subpoena requested.</p>	<p>Deposition scheduled for June 6, 2019, at a time to be determined.</p>

	Hollywood Airport and Marjory Stoneman Douglas High School shooting incidents. Oversaw creation of and coordination with Broward County Schools Real Time Crime Center (RTCC)		
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	Deposition subpoena requested.	Deposition for Wednesday, June 5, 2019, at 12:30 pm, at the Broward County Attorney's Office
Edward Grant, retired Lt. Colonel, Broward Sheriff's Office 	Former SWAT Commander present at Fort Lauderdale-Hollywood Airport shooting incident and interacted with other responding law enforcement officers and agencies. Knowledge of Marjory Stoneman Douglas High School shooting incident.	Deposition subpoena requested.	Deposition date and time are still being coordinated based on witness and counsel availability.
Scott Israel, Broward County Sheriff,	All aspects of suspension		Trial appearance

<p>C/O Benedict P. Kuehne, Kuehne Davis Law, P.A., 100 S.E. 2 Street, Suite 3550, Miami, FL 33131</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>Deposition subpoena requested.</p>	<p>Deposition date and time are still being coordinated based on witness and counsel availability.</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 heroism in the line of duty.</p>	<p>Deposition subpoena requested.</p>	<p>Deposition is being coordinated by the BSO General Counsel for a date available to all counsel.</p>
<p>Angela Mize, Broward Sheriff's Office, Acting Director, Regional Communicatio</p>	<p>Knowledge of BSO regional communications in use at time of Fort Lauderdale-Hollywood Airport and Marjory</p>	<p>Deposition subpoena requested.</p>	<p>Deposition is being coordinated by the BSO General Counsel for a date</p>

<p>ns, 2601 West Broward Blvd, Fort Lauderdale, FL 33312</p>	<p>Stoneman Douglas High School shooting incidents, including system limitations, workarounds needed as result of Broward County ongoing efforts to upgrade the regional communications system.</p>		<p>available to all counsel.</p>
<p>Mel Murphy, Deputy Sheriff, Broward Sheriff's Office, 2601 West Broward Blvd, Fort Lauderdale, FL 33312</p>	<p>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</p>	<p>Deposition subpoena requested.</p>	<p>Deposition is being coordinated by the BSO General Counsel for a date available to all counsel.</p>
<p>Nathan Osgood, Retired Major, Broward Sheriff's Office</p>	<p>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</p>	<p>Deposition subpoena requested.</p>	<p>Deposition date and time are still being coordinated based on witness and counsel availability.</p>
<p>George Piro, Federal Bureau of Investigation, Special Agent in Charge,</p>	<p>FBI Special Agent in Charge at time of Fort Lauderdale-Hollywood Airport shooting incident, and knowledge of inter-</p>	<p>Deposition subpoena requested.</p>	<p>Deposition date and time are still being coordinated based on</p>

Miami Field Office, 2030 SW 145 Avenue, Miramar, FL 33027	agency law enforcement coordination		witness and counsel availability.
James Polan, former Colonel, Broward Sheriff's Office [REDACTED]	Knowledge of Fort Lauderdale-Hollywood Airport and Marjory Stoneman Douglas High School shooting incidents, including post-shooting assessment and response	Deposition subpoena requested.	Deposition date and time are still being coordinated based on witness and counsel availability.
Robert Pusins, former Executive Director, Broward Sheriff's Office, [REDACTED]	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	Trial subpoena requested.	Trial subpoena requested.
Steve Robson, Major, Broward Sheriff's Office, 2601 West Broward Blvd, Fort Lauderdale, FL 33312	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	Deposition subpoena requested.	Deposition is being coordinated by the BSO General Counsel for a date available to all counsel.

	involvement at time of the incidents		
Kevin Shults, Retired Major, Broward Sheriff's Office 	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	Deposition subpoena requested.	DEPOSITION Monday, May 10, 2019, morning (may be altered depending on Pre-Hearing Conference scheduling).
Lisa Zarazinski, Broward Sheriff's Office, Former Director, Regional Communications, 2601 West Broward Blvd, Fort Lauderdale, FL 33312	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	Deposition subpoena requested.	Deposition is being coordinated by the BSO General Counsel for a date available to all counsel.
Any person deposed in this proceeding.			
Any person			

listed by other parties in this proceeding.			
Any persons called as witnesses by other parties in this proceeding.			
Any person who may be necessary to authenticate documents or testify regarding hearsay or other objections.			
Any rebuttal and/or impeachment witnesses.			No rebuttal witnesses known

Respectfully submitted,

Benedict P. Kuehne

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

Copy:

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