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Fort Lauderdale, FL 33301

REPLY TO: Miami

May 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
Sheriff Israel's Witness List & Exhibit List

Dear Special Master Goodlette:

Sheriff Israel submits this Witness List and Exhibit List in accordance with Florida Senate Rule 12.9 and the Special Master's instructions.

Sheriff Israel reserves the right to amend the Witness List and Exhibit List upon communication with counsel for the Governor and the Special Master, and as the case develops. Sheriff Israel reserves the right to call any witness through deposition or live testimony.

WITNESS LIST

Kevin Bartlett, Captain, Broward Sheriff's Office	Fire Rescue protocol and response
Angelo Cedeno, Major, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident
John Curcio, Detective, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident; Marjory Stoneman Douglas High School shooting incident
Jack Dale, former Colonel,	Fort Lauderdale-Hollywood

Broward Sheriff's Office	Shooting Incident and Marjory Stoneman Douglas High School Shooting incidents, and BSO Policies, Procedures, and Practices
Ron DeSantis, Governor	Florida Governor
James Diefenbacher, Captain, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident; Certification and accreditation
Michael Dimaggio, former Lt. Colonel, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident; Marjory Stoneman Douglas High School shooting incident; Coordination with Broward County Schools; Real Time Crime Center (RTCC)
Robert Furman, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident
Steve Geller, Commissioner, Broward County	Broward County regional communications system
Edward Grant, retired Major, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident; Marjory Stoneman Douglas High School shooting incident; Coordination with law enforcement agencies
Scott Israel, Broward County Sheriff	All aspects of suspension
Stephen Kinsey, former Undersheriff, Broward County Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident; Marjory Stoneman Douglas High School shooting incident; NIMS Training
Jesse Madrigal, Deputy Sheriff, Broward Sheriff's Office	Response to Fort Lauderdale-Hollywood Airport shooting incident; 2018 Deputy of the Year
Angela Mize, Broward Sheriff's	Fort Lauderdale-Hollywood

Office, Acting Director, Regional Communications	Airport shooting incident; Marjory Stoneman Douglas High School shooting incident; Communications
Mel Murphy, Deputy Sheriff, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident; Marjory Stoneman Douglas High School shooting incident; Training
Representative to be determined	Marjory Stoneman Douglas High School Public Safety Commission
Representative to be determined	Broward County Consolidated Communications Committee
Robert Payton, former City Manager, Parkland, Florida	Marjory Stoneman Douglas High School shooting incident; Operations agreement with Broward Sheriff's Office
Jorge Piro, Federal Bureau of Investigation	Fort Lauderdale-Hollywood Airport shooting incident; Inter-agency coordination
James Polan, former Colonel, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident; Marjory Stoneman Douglas High School shooting incident
Robert Pusins, former Executive Director, Broward Sheriff's Office	BSO Policies, Procedures, and Practices; Regional communications
Steve Robson, Major, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident; Marjory Stoneman Douglas High School shooting incident; Training
Kevin Shults, Retired Major, Broward Sheriff's Office	Fort Lauderdale-Hollywood Airport shooting incident; Marjory Stoneman Douglas High School shooting incident; Training and development
Lisa Zarazinski, Broward Sheriff's Office, Former	Fort Lauderdale-Hollywood Airport shooting incident;

Director, Regional Communications	Marjory Stoneman Douglas High School shooting incident; Communications
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.	

EXHIBIT LIST

1	BSO Active Shooter Standard Operating Procedure §4.37 (March 2016)
2	BSO Active Shooter Standard Operating Procedure §4.37 (November 2013)
3	BSO Active Shooter Standard Operating Procedure §4.37 (December 2018)
4	BSO Active Shooter Standard Operating Procedure §4.37 (as of December 2012)
5	BSO Active Shooter Standard Operating Procedures §4.37 (2010-2012)
6	Fitch Report, Broward County
7	International Association of Chiefs of Police (IACP) Law Enforcement Policy Center Active Shooter/Killer Model Policy (April 2018)
8	International Association of Chiefs of Police (IACP) Law Enforcement Policy Center Active Shooter Concept and Issues Paper (April 2018)

9	BSO Lesson Plans post-Marjory Stoneman Douglas High School shooting incident
10	Communications Operator Agreement between Broward Sheriff's Office and Broward County
11	Broward Sheriff's Office Accreditations
12	Commission on Accreditation for Law Enforcement Agencies (CALEA), Broward Sheriff's Office Accreditations
13	Commission on Florida Law Enforcement Accreditation (CFLEA), Broward Sheriff's Office Accreditations
14	Police Service Contracts between Broward Sheriff's Office and Parkland, Florida
16	Police Service Contracts between Broward Sheriff's Office and Broward County municipalities (2013-2018)
17	Fire Service Contracts between Broward Sheriff's Office and Broward County municipalities (2013-2018)
18	Broward County Annual Uniform Crime Reports (2103-2018)
19	Broward Sheriff's Office "Todd Fatta" Policy
20	International Association of Chiefs of Police (IACP) 2014 Leadership in Human and Civil Rights Award
21	National Incident Management System (NIMS) Training Program (2011)
22	Broward Sheriff's Office Memorandum re: NIMS Training
23	NIMS Course Completion Certificates, Broward Sheriff's Office
24	Memorandum of understanding between Broward Sheriff's Office and Broward County Schools re: School Cameras
25	SaferWatch App smartphone application, Broward County Sheriff's Office
26	Deputy Scot Peterson Training File, Broward Sheriff's Office
27	Good Morning America Interview, Deputy Scot Peterson
28	Broward Sheriff's Office Active Shooter training, Pompano Beach High School (2013)
29	Police One article, Active shooters in schools: A template for police trainers (May 14, 2013)

30	Analysis of Florida law enforcement active shooter policies (2018)
31	Broward County Public Schools, Special Investigative Unit, School Board Workshop program materials (January 23, 2018)
32	Florida Department of Law Enforcement (FDLE) Certification of Broward Sheriff's Office as Certified Training Center
	All documents filed with Circuit Court, District Court of Appeal, and Florida Supreme Court in <i>Quo Warranto</i> proceedings.
	All exhibits listed by any other party to this proceeding.
	All documents produced by any other party to this proceeding.
	All deposition transcripts and exhibits in this proceeding.

SUMMARY STATEMENT

Sheriff Israel set forth his denials, defenses, and position in detail in his Response to the Governor's Bill of Particulars, which Response is incorporated by reference. The testimony and exhibits will demonstrate that the allegations in Executive Order 19-14 and the Governor's Bill of Particulars are false or otherwise do not establish that Sheriff Israel neglected his duties as Sheriff or has otherwise exhibited incompetence. The evidence will show there was no lack of effective policies and

procedures in place prior to, and during the Fort Lauderdale-Hollywood Airport shooting incident and the Marjory Stoneman Douglas High School shooting incident. The evidence will show that Sheriff Israel and the Broward Sheriff's Office engaged in widespread and persistent training of Broward Sheriff's Office deputies and employees prior to, during, and after the subject incidents on a variety of issues, including active shooter/killer procedures and crisis intervention. The evidence will show that the Broward Sheriff's Office under Sheriff Israel's leadership was certified by CALEA and CFLEA as representing the highest standards in law enforcement practices. The evidence will show that the policies, practices, and procedures of the Broward Sheriff's Office during Sheriff Israel's leadership were routinely examined and evaluated by professional police organizations and were never found to be wanting or inadequate. The evidence will show that the Broward Sheriff's Office Active Shooter procedures and training in effect during Sheriff Israel's leadership were consistent with Florida and national law enforcement standards.

The sum total of the evidence will demonstrate that Sheriff Israel did not neglect his duties and was not incompetent.

Respectfully submitted,

Benedict P. Kuehne

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

Copy:

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