

LAW OFFICE OF  
KUEHNE DAVIS LAW  
PROFESSIONAL ASSOCIATION

BENEDICT P. KUEHNE\*  
SUSAN DMITROVSKY  
MICHAEL T. DAVIS  
\*Board Certified  
Appellate Practice and  
Criminal Trial Practice

MIAMI TOWER, SUITE 3550  
100 S.E. 2<sup>ND</sup> Street  
MIAMI, FLORIDA 33131-2154  
Telephone: 305-789-5989  
Facsimile: 305-789-5987  
ben.kuehne@kuehnelaw.com  
susand@kuehnelaw.com  
mdavis@kuehnelaw.com

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

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  
Request for Consideration of Scot Peterson  
Arrest and Prosecution

Dear Special Master Goodlette:

Last week, as we were preparing for the depositions in this matter, we learned through media sources that former BSO Deputy Scot Peterson was arrested and charged with child neglect, perjury, and culpable negligence in connection with his actions during the Marjory Stoneman Douglas High School shooting incident. At the same time, we learned that FDLE conducted over 180 witness interviews, reviewed hours of surveillance video, and wrote over 200 investigative reports. Pursuant to the Florida Public Records law, the information currently in the possession of the FDLE and the Broward County State Attorney's Office are not only relevant but are likely exculpatory to Sheriff Israel.

Despite making inquiries and requests, it does not appear we will be accessible in the time frame involving these proceedings. Therefore, in the interest of Due Process, we request that this development be considered at the Pre-Hearing Conference on June 10, 2019, and its impact on these proceedings.

Respectfully submitted,

*Benedict P. Kuehne*

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

Copy:

Jeremiah Hawkes, Senate General Counsel

hawkes.jeremiah@flsenate.gov

Nicholas A. Primrose, Deputy General Counsel

Nicholas.primrose@eog.myflorida.com

Christie M. Letarte, Special Counsel, letarte.christie@flsenate.gov