

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA

STATE OF FLORIDA

CASE NO. 2018CF003875AXX
CRIMINAL DIVISION W

vs.

SUSAN HAYNIE
Defendant,

_____ /

STATE'S DISCOVERY EXHIBIT AND DEMAND
FOR DEFENDANT'S DISCOVERY EXHIBIT

The State of Florida, through its undersigned Assistant State Attorney and pursuant to Fla.R.Crim.P. 3.220(b), submits this Response to Defendant Raja's Notice of Discovery. The State says:

1. The names and addresses of all persons known to the prosecutor to have information which may be relevant to the offense(s) charged, and to any defense with respect thereto, or to any similar fact evidence to be presented at trial under section 90.404(2), Florida Statute, are hereby separately designated as follows:

a. Category A witnesses include:

LAW ENFORCEMENT

Florida Commission on Ethics
345 John Knox Road, Tallahassee, FL 32303
Ron Moalli Investigator

Palm Beach County Commission on Ethics
300 N. Dixie Hwy., WPB, FL 33401
Abigail Irizarry Investigator

Palm Beach County State Attorney's Office Public Corruption Unit

**Diana Burfield
Ted Buler**

**Detective
Investigator**

CIVILIANS

**James Batmasian 215 N. Federal Highway, Boca Raton, FL 33432
Marta Batmasian 215 N. Federal Highway, Boca Raton, FL 33432
Corey Bryant Tivoli Park, 603 Siesta Key Circle, Deerfield Beach, FL 33441
Frank Chapman 450 East Coconut Palm Road, Boca Raton, FL 33432
J. Neil Haynie 800 Cypress Way, Boca Raton, FL 33486
Barbara Kenney Camino Gardens, 3901 N. Federal Hwy, Boca Raton, FL 33431
Scott Lawson Royal Palm Place, 101 Plaza Real, Boca Raton, FL 33432
Ann Waller Boca Bend Marina Apts, 3100 S. Dixie Hwy, Boca Raton, FL 33432
Al Zucaro 6018 SW 18th Street, Suite C-2, Boca Raton, FL 33433**

Witnesses who were present when a recorded or unrecorded statement was taken from or made by a defendant or co-defendant are as follows:

- Inv. Abigail Irizarry, Ethics Commission (1/17/18) – 2 Statements
- Mark Herron (1/17/18)
- Inv. Ron Moalli, Ethics Commission (1/17/18)

b. Category B witnesses include:

1. Custodian of Records, Bank of America
2. Custodian of Records, City of Boca Raton
3. Custodian of Records, Community Reliance, LLC, FL
4. Custodian of Records, Computer Golf Software
5. Custodian of Records, Florida Commission on Ethics
6. Custodian of Records, Florida Department of Business and Professional Regulation
7. Custodian of Records, Florida Department of Highway Safety and Motor Vehicles
8. Custodian of Records, Florida Department of State, Division of Corporations
9. Custodian of Records, Monroe County Property Appraisers Office
10. Custodian of Records, Palm Beach County Commission on Ethics
11. Custodian of Records, Palm Beach County Property Appraisers Office
12. Custodian of Records, Stanley Steemer
13. Custodian of Records, Tivoli Park Condominiums, Deerfield Beach,

FL
14. Custodian of Records, Wells Fargo Bank

c. Category C witnesses include:

NA

The names and addresses of all persons known to the prosecutor to have information that may be relevant to an offense charged or a defense thereto have been disclosed above. Other "personal identification information," and defined by §817.568, Florida Statutes, will not be disclosed within this pleading. Copies of any documents containing personal identification information will be furnished to the defendant with such personal identification information (other than witness name and addresses) redacted. See also Chapter 2002-256, Laws of Florida.

PURSUANT TO FLA.R.CRIM.P. 3.220(h)(1), NO WITNESS NAMED HEREIN SHALL BE DEPOSED MORE THAN ONCE EXCEPT BY CONSENT OF THE PARTIES, OR BY ORDER OF THE COURT ISSUED UPON GOOD CAUSE SHOWN.

2. With respect to the persons listed in the preceding paragraphs, the State is in possession of the following statements:

- Digital Recording of Marta Batmasian (1-10-2018)

3. The State is in possession of the following written or recorded statements made by the defendant:

- Recorded Statements - 2 (1/17/18)

a. The substance of any oral statements known by the State to have been made by the defendant IS as follows:

- Biographical information; Discussion of business interests; Discussion of potential voting conflicts; Discussion of understanding the Code of Ethics.

b. The State is in possession of the following police reports or report summaries which include statements made by the defendant:

SEE BELOW

c. The following are the names and addresses of persons known by the State to have witnessed any of the above-referenced statements:

SEE ABOVE

4. The State is in possession of the following written or recorded statements made by a co-defendant:

N/A

a. The following is the substance of any oral statements made by a co-defendant:

N/A

5. The State is in possession of the following portions of recorded grand jury minutes that contain testimony of the defendant:

N/A

6. The State is in possession of the following tangible papers or objects which were obtained from or belonged to the defendant:

NA

7. The State **DOES NOT** have any material or information which has been provided by a confidential informant.

8. There **HAS NOT** been any electronic surveillance, including wiretapping, of the premises of the defendant, or of conversations to which the defendant was a party.

9. There **HAS NOT** been a search or seizure.

10. The State is in possession of the following reports or statements of experts made in connection with this particular case, including results of physical or mental examinations

and of scientific tests, experiments or comparisons:

NA

11. The State intends to use in a hearing or the trial of this cause the following tangible papers or objects which were not obtained from or belonged to the defendant:

- All police reports and court documents related to the following cases:

Palm Beach County Commission on Ethics

17-020

17-038

17-107

RQO 13-006

Palm Beach County State Attorney's Office Public Corruption Unit

17PI000025

- **Business Record Declaration for Wells Fargo Bank Accts. Ending # [REDACTED], [REDACTED]**
- **CAM License (Haynie)**
- **Checks to Haynie from Batmasian**
- **Complaint Letters (Zucaro and Chapman)**
- **Documentation of Ownership of Property in Palm Beach and Monroe Counties**
- **Documents re: Community Reliance (Secretary of State)**
- **Documents re: Computer Golf Software of Nevada**
- **Documents re: Investments Limited**
- **Documents re: Tivoli Financials & Transactions**
- **Documents re: Tivoli Park Master Assoc. (Secretary of State)**
- **Emails (Marta Batmasian & Kleppin & Ethics Opinion)**
- **Homestead Exemption Record for 215 N. Federal Hwy, Boca Raton**
- **Income Documents for Susan Haynie**
- **Minutes to Boca Raton City Council Meetings (including April Meeting)**
- **Payment Records from Tivoli**
- **Property Receipt**
- **Signature Cards**
- **Statements of Financial Interests [REDACTED]**
- **Subpoena to Bank of America & Results for Accts. ending in [REDACTED], [REDACTED] (Includes certification & Personal Signature Cards)**
- **Subpoena to FL Division of Corporations & Results for Community**

In addition, the State demands that the defendant disclose to the State, and permit the undersigned prosecutor to inspect, copy, test, and photograph, the following information and material which is in the possession or control of the defendant:

- A. The statement of any person whose name and address has been furnished to the prosecutor pursuant to Fla.R.Crim.P. 3.220(d).
- B. Reports of statements of experts made in connection with this particular case, including results of physical or mental examinations and of scientific tests, experiments or comparisons.
- C. Any tangible papers or objects which the defendant intends to use in a hearing or the trial of this cause.

The undersigned prosecutor demands that the defendant make the foregoing disclosures within fifteen (15) days after receipt by the defense of the corresponding disclosure from the prosecutor, and further that the defendant perform such obligations in a manner mutually agreeable to the defense and the prosecutor.

Respectfully submitted this 8th day of June, 2018.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy hereof has been furnished to the following counsel of record by E-service this 8th day of June, 2018.

Bruce Zimet
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One Clearlake Centre
250 N. Australian Avenue
Suite 1400
West Palm Beach, FL 33401

DAVID ARONBERG
STATE ATTORNEY

/s/



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