IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 2017CF008722AMB

STATE OF FLORIDA,

v.

SHEILA KEEN WARREN,

PETITION FOR CIVIL RESTITUTION LIEN

COME NOW, the victims, the Estate of Marlene Warren and Joseph Ahrens, by and through their undersigned counsel, pursuant to Florida Statute 960.292 and hereby moves this Honorable Court for an Order entering a civil restitution lien and as grounds therefore, states as follows:

- 1. On May 25, 1990, the Defendant, Sheila Keen Warren, shot and killed the decedent/victim, Marlene Warren, in Wellington, Palm Beach County, Florida.
- 2. Ms. Warren was subsequently charged with Second Degree Murder.
- 3. On April 25, 2023, this Honorable Court entered a judgment against the Defendant, Sheila Keen Warren, who pled guilty, adjudicating her guilty of Second Degree Murder and sentencing her to twelve (12) years of incarceration. See attached judgment as *Exhibit "A"*.
- 4. As a result of the injuries sustained by the victims, the Estate of Marlene Warren and Joseph Ahrens, individually, sustained significant injuries and have undergone and continue to undergo extensive medical treatment, including

- psychological torment, anxiety, fear, depression, and have incurred both economic and non-economic damages, which are presently immeasurable.
- 5. Chapter 960.293, Florida Statutes allows for the victim of a capital or life felony entitlement to an award of \$250,000.00 in liquidated damages.
- 6. However, such damages are not exclusive and do not bar any other subsequent civil remedies available to the victim. See, Fla. Stat. 960.295(1-2).
- 7. Pursuant to Fla. Stat § 960.292, the Defendant, Sheila Keen Warren, is estopped from contesting the essential allegations of the offense that this Court convicted her of.
- 8. Fla. Statute 960.292(1) states:
 - "Upon conviction, the convicted offender shall incur civil liability for damages and losses to crime victims.... (T)he conviction shall estop the convicted offender from denying the essential allegations of that offense in any subsequent proceedings."
- 9. Subsection 2 of the Statute states that upon petition of the crime victim, the Court in which a convicted offender is convicted shall enter civil restitution lien orders in favor of crime victims. The Order shall include the name of the convicted offender, the case number assigned to the applicable criminal case, and the name and social security number of the crime victim, state, its local subdivisions or agreed parties.
- 10. Sheila Keen-Warren has violated the rights of the victims pursuant to Statute 960.292 and this Court is mandated to enter the civil restitution lien accordingly, which shall preclude Sheila Keen Warren from challenging the essential

allegations of the Second Degree Murder conviction in the litigation that is forthcoming.

WHEREFORE, the victims, the Estate of Marlene Warren and Joseph Ahrens, individually, respectfully request this Honorable Court enter an Order of a civil restitution lien against Sheila Keen Warren, Case Number 2017CF008722AMB, in the Circuit Court in the 15th Judicial Circuit of Florida, in and for Palm Beach County, on behalf of the Estate of Marlene Warren and Joseph Ahrens, and any and other relief this Court deems necessary.

I HEREBY CERTIFY that a true and correct copy of the was filed electronically and was sent by E-Mail from the Florida's Court's E-Filing Portal system, unless other noted below, on all counsel or parties of record listed below, this 16th day of June 2023.

SCHULER, WEISSER, ZOELLER, OVERBECK & BAXTER, P.A. Attorneys for Petitioners
Barristers Building, Fourth Floor
1615 Forum Place
West Palm Beach, FL 33401
hjoss@shw-law.com;
rchew@shw-law.com
(561) 689-8180

By: /s/ Harrison A. Joss Harrison A. Joss, Esq. FBN: 118289

IN AND FOR PALM BEACH COUNTY, FLORIDA CASE NO: 2017CF008722AMB DIV: X **OBTS NUMBER:** STATE OF FLORIDA ٧. SHEILA KEEN WARREN, 1 PROBATION VIOLATOR W/F, COMMUNITY CONTROL VIOLATOR 08/06/1963, RETRIAL [] RESENTENCE JUDGMENT The above defendant, being personally before this Court represented by AMY MORSE ESO (attorney) Having been tried and found [XXX] Having entered a plea of guilty Having entered a to the following crime(s): guilty of the following plea of nolo crime(s): contendere to the following crime(s): COUNT PFENSE STATUTE NUMBER(S) **CRIME DEGREE** SECOND DEGREE MURDER (LIO) 782.04 (2) 1/PBL and the Court having made a factual finding, the above crime(s) qualify as a crime of domestic violence pursuant to s. 741.28. and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the [XXX] defendant is hereby ADJUDICATED GUILTY of the above crime(s). and being a qualified offender pursuant to s. 943.325, the Defendant shall be required to submit DNA samples as [XXX] required by law. [] and good cause being shown: IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD. **SENTENCE** The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on **STAYED** [] probation and/or [] Community Control under the supervision of the Dept. Of Corrections (conditions of probation set forth in separate order). SENTENC DEFERRED The Court hereby defers imposition of sentence until The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal with the Clerk of Court within thirty days following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency. DONE AND OXDERED in Open Court at Palm Beach County, Florida, this __25TH__ day of __APRIL__, 2023. FILED ERCUIT COURT JUDGE Circuit Criminal Department APR 25 2023

IN THE CIRCUIT COURT, FIFTEENTH JUDICIAL CIRCUIT

JOSEPH ABRUZZO

Clerk of the Circuit Court & Comptroller

Palm Beach County

IN THE CRIMINAL DIVISION OF THE CIRCUIT/COUNTY COURT OF THE FIFTEENTH JUDICAL CIRCUIT OF FLORIDA, IN AND FOR PALM BEACH COUNTY

CASE NO. 50-2017-CF-008722-AXXX-MB

DIV. X: Felony - X (Circuit)

OBTS NUMBER: 5003415992

STATE OF FLORIDA

V

ſ **I COMMUNITY CONTROL VIOLATOR**

SHEILA KEENWARREN DEFENDANT

] PROBATION I **VIOLATION**

August 6, 1963

DATE OF BIRTH

White RACE

Female

GENDER

The fingerprints below are those of said Defendant taken by Deputy Sheriff

SIERRA # 1. R. THUMB 2. R. INDEX 3. R. MIDDLE 4. R. RING 5. R. LITTLE 6. L. THUMB 7. L. INDEX 8. L. MIDDLE 9. L. RING 10. L. LITTLE









I hereby certify that the above and foregoing fingerprints are the fingerprints of the defendant, SHEILA KEENWARREN, and that they were placed thereon by said defendant in my presence this 25 day of _

Circuit/County Court Judge - Clerk Deputy Sherist

(Please Circle Title)