

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA

CASE NUMBER: 2020-CF-002603-A-O

DIVISION 20

STATE OF FLORIDA

Plaintiff,
vs.

SARAH BOONE

Defendant.

ORDER

THIS CAUSE came before the Court on June 28, 2024, on Defense Counsel, Patricia A. Cashman's, Esquire, *Motion to Withdraw as Counsel* filed June 11, 2024 (the "Motion"). The Court having reviewed the Motion, having reviewed the court file, having reviewed the audio transcripts from various hearings, having considered the positions offered by counsel, Patricia A. Cashman, Esquire, having considered the testimony offered by Defendant, SARAH BOONE, and having considered the positions offered by counsel for State, hereby finds:

CHARGES

- A. On March 23, 2020, by way of information, the Defendant was charged with Second Degree Murder.

PROCEDURAL HISTORY

- B. On February 26, 2020, the Office of the Public Defender, Ninth Judicial Circuit, in and for Orange County, Florida ("the Public Defender" and "Attorney #1") was appointed to represent Defendant.

- C. On March 9, 2020, the Public Defender moved to withdraw due to Defendant retaining private counsel, to wit Mauricio Padilla, Esquire and the Padilla Law Group (“Padilla” and “Attorney #2”).
- D. On March 11, 2020, that certain Order Allowing Withdrawal was entered which withdrew the Public Defender from further representation of the Defendant.
- E. On April 18, 2022, Padilla moved to withdraw due to “irreconcilable differences [arising] between undersigned and the defendant that have made it impossible for undersigned to effectively represent his client. As always, it is difficult to convey all particulars to the Court and at the same time, maintain all duties to the client.” This motion was served upon the Defendant and Defendant confirmed receipt. See letter dated April 20, 2022 and filed on April 26, 2022.
- F. On April 29, 2022, a hearing was held on Padilla’s Motion to Withdraw. At the time of this hearing, Padilla had been representing Defendant for two years. Defendant was present for the hearing and was sworn. The Court advised Padilla that the Court had received a letter from Defendant (a letter dated April 20, 2022 and filed on April 26, 2022) which seemingly objected to Padilla’s withdrawal. The Court advised Padilla that the options were to not proceed on Padilla’s motion to withdraw or provide the Court more about the “irreconcilable differences.” Padilla requested an opportunity to amend the motion to address the “irreconcilable differences.” The Court reserved ruling on Padilla’s motion to withdraw, gave Padilla until May 3, 2022 to prepare and file an amended motion with a hearing to be heard on the week of May 9, 2022. The State advised of Padilla’s diligence in preparation and the Court commended Padilla’s work. Defendant testified to a “lack of trust” between herself and Padilla.

G. On May 4, 2022, Padilla filed an Amended Motion to Withdraw¹, which supplemented the original grounds:

- i. ¶2 - “Undersigned’s relationship with defendant has become adversarial. The aforementioned adversarial relationship has interfered with undersigned counsels’ (sic) ability to effectively represent his client, especially preparing for trial.”
- ii. ¶3 - “Undersigned appreciates the court providing him the opportunity to amend his previously filed motion to withdraw. However, after further researching the issue undersigned is still under the belief that the specifics of the adversarial relationship may disclose information that may prejudice his client and as such will stand mute on the specifics.”

H. On May 6, 2022, Padilla filed a Second Amended Motion to Withdraw², which further supplemented the original grounds:

- i. ¶3 - “Undersigned relationship with the defendant has deteriorated to a point where undersigned counsel can no longer give effective aid in the fair representation of Ms. Boone’s defense. This motion is in compliance with Fla. R. Jud. Admin. 2.505(f)(1) and Rule 4-1.16(b), Rules Regulating the Florida Bar, are present, or whether the ‘attorney-client relation’ has ‘deteriorated to a point where counsel can no longer

¹ The same “irreconcilable differences [arising] between undersigned and the defendant that have made it impossible for undersigned to effectively represent his client. As always, it is difficult to convey all particulars to the Court and at the same time, maintain all duties to the client” grounds were included.

² The same “irreconcilable differences [arising] between undersigned and the defendant that have made it impossible for undersigned to effectively represent his client. As always, it is difficult to convey all particulars to the Court and at the same time, maintain all duties to the client” and “[u]ndersigned’s relationship with defendant has become adversarial. The aforementioned adversarial relationship has interfered with undersigned counsels’ ability to effectively represent his client, especially preparing for trial” were grounds included.

give effective aid in the fair presentation of a defense.’ See Sanborn, 474 So. 2d at 314.”

- I. On May 10, 2022, a hearing was held on Padilla’s Second Amended Motion to Withdraw. Defendant was present for the hearing and was sworn. Padilla advised the Court that he had no other choice to file the motion due to ethical concerns. Defendant confirmed that she wanted to terminate Padilla as her attorney. The State expressed concern of a strategy to allow defense attorney after attorney to represent Defendant. The Court advised Defendant of the state’s concern regarding a strategy of Defendant being unhappy with every attorney and advised Defendant about the dangers of self-representation. The Court appointed the Public Defender (“Attorney #3”).
- J. On June 6, 2022, the Public Defender moved to withdraw due to a conflict.
- K. On June 7, 2022, that certain Order Allowing Public Defender Withdrawal was entered which withdrew the Public Defender from further representation of the Defendant and appointed the Office of Criminal Conflict and Civil Regional Counsel (“RCC” and “Attorney #4”).
- L. On June 10, 2022, RCC moved to withdraw due to a conflict.
- M. On June 22, 2022, that certain Order Allowing The Office of Criminal Conflict and Civil Regional Counsel Withdraw was entered which withdrew RCC from further representation of the Defendant and appointed Marc Consalo (“Consalo” and “Attorney #5”).
- N. On July 8, 2022, the Consalo moved to withdraw due to a conflict.

- O. On July 11, 2022, that certain Withdraw Order was entered which withdrew Consalo from further representation of the Defendant and appointed Frank J. Bankowitz³ (“Bankowitz” and “Attorney #6”).
- P. On July 12, 2022, Bankowitz, in open court, requested a continuance due to his recent appointment and same was granted. Thereafter, the Court set a pretrial conference for October 25, 2022 at 9:00AM and trial during the trial period beginning November 7, 2022.
- Q. On October 25, 2022, the Court held the pretrial conference and addressed the Court’s understanding that a continuance was being sought and the Court’s judicial assistant was to reach out to the parties to confirm if a continuance was being sought.
- R. On October 27, 2022, Bankowitz filed Defendant’s Motion to Continue.
- S. On October 28, 2022, the Court entered that certain Amended Order on Defendant’s Stipulated Motion to Continue which set a pretrial conference for January 17, 2023 at 9:00AM and trial during the trial period beginning January 30, 2023.
- T. On November 22, 2022, the Court set a status hearing on Tuesday, December 20, 2022 at 10:45 a.m.
- U. On December 19, 2022, Bankowitz moved to withdraw due to “the irreconcilable differences which have arisen between the undersigned his client and his family the undersigned will be unable to effectively and properly continue representing the Defendant herein.”
- V. On December 20, 2022, the status hearing was held. Bankowitz did not appear due to a car accident and the Court reset the status hearing for December 22, 2022 at 11:00AM.

³ That certain Order Substituting Conflict Counsel entered October 25, 2022 also appointed Bankowitz as counsel for the Defendant.

- W. On December 22, 2022, the reset status hearing was held. Bankowitz appeared virtually and due to technological issues Bankowitz was unable to hear the Court. The Court reset the status hearing for December 27, 2022.
- X. On December 27, 2022, a hearing was held on Bankowitz's Motion to Withdraw. Defendant was present for the hearing and was sworn. The Court advised Defendant that the Court had received letters from Defendant (a letter dated October 3, 2022 and filed on October 7, 2022, a letter dated November 3, 2022 and filed on November 7, 2022⁴, and a letter dated December 5, 2022 and filed on December 14, 2022⁵). The Court conducted a *Nelson* hearing and Defendant **was not** seeking to remove Bankowitz. Bankowitz advised the Court of the 1000s of pages in discovery that he had reviewed and organized and his contact and potential use of and collaboration with expert witnesses, including experts, that Padilla (Attorney #2) utilized. Bankowitz advised the Court of Defendant's attempts to call Bankowitz at a rate of 5-10 times a day. Bankowitz further advised of his efforts to balance the demands of other clients with the Defendant's expectations for communications. In response, Defendant riposted that Bankowitz's representations were "untruths," raised Bankowitz's prior public reprimands for lack of communication, alleged Bankowitz's action in this case rose to a similar level, and **then sought to remove** Bankowitz. The Court pointed out Defendant's inconsistent statements within minutes of them being made and addressed concerns over Defendant's motivations, especially when there is something Defendant disagreed with. The Court specifically advised Defendant that she is "not entitled to an endless line of court appointed lawyers until you find the one

⁴ The November 3, 2022 letter sets forth ad hominem attacks on Bankowitz's "professionalism." See page 2.

⁵ The December 5, 2022 letter sets forth ad hominem attacks on Bankowitz; including "severely mislead" and "neglect." See pages 2-3.

that you personally prefer.” The Court also explained the circumstances where Defendant could represent herself. Ultimately, Defendant did not request to remove Bankowitz. The Court denied Bankowitz’s Motion to Withdraw and directed Bankowitz to have a conference with Defendant prior to the pretrial conference previously set for January 17, 2023.

Y. The case was continued several times due to Bankowitz’s attempts to retain an expert through JAC and JAC’s response to same⁶.

Z. During this time period, the Court had received several letters from Defendant (a letter dated January 10, 2023 and filed on January 17, 2023⁷, a letter dated March 22, 2023 and filed on April 14, 2023, a letter dated April 6, 2023 and filed on April 14, 2023, a letter dated May 15, 2023 and filed on May 18, 2023⁸, a letter dated June 29, 2023 and filed on July 21, 2023⁹, and a letter dated August 2, 2023 and filed on August 7, 2023.

AA. On August 22, 2023, Bankowitz again moved to withdraw due to:

- i. ¶2 - “irreconcilable differences [arising] between undersigned and the defendant that have made it impossible for undersigned to effectively represent his client. As always, it is difficult to convey all particulars to the Court and at the same time, maintain all duties to the client.”

⁶ See also Defendant’s Quasi Ex Parte Motion for Appointment of Defense Forensic Psychologist and Request for Sealed Order E-Filed 07/17/2023 and the Justice Administrative Commission’s Ex Parte Response to Motion for Appointment of Defense Forensic Psychologist E-Filed 07/19/2023.

⁷ The January 10, 2023 letter sets forth ad hominem attacks on Bankowitz’s professionalism and morals. See page 2.

⁸ The May 15, 2023 letter sets forth ad hominem attacks on the Court; alleging that Judge Wayne C. Wooten was being monetarily compensated from third parties’ use of information that is publicly available. See page 4.

⁹ The June 29, 2023 letter sets forth ad hominem attacks on Padilla, which *were not raised* during either the April 29, 2022 hearing or during the May 10, 2022 hearing on Padilla’s motions to withdraw as set forth above. See page 4.

- ii. ¶3 - The Defendant will not be satisfied with any attorney unless said attorney does not have a case load and can dedicate his or her time solely to Ms. Boone's case.
- iii. ¶5 - The best possible avenue is to have the Defendant represent herself as no attorney can satisfy her.

BB. On September 8, 2023, a hearing was held on Bankowitz's Motion To Withdraw. Defendant was present for the hearing and was sworn. Bankowitz addressed Defendant's "derogatory" statements (i.e., "dud," buffoon") and "berating" behavior. The Court advised Defendant that the Court had received letters from Defendant (a letter dated August 26, 2023 and filed on September 7, 2023 and a letter dated August 30, 2023 and filed on September 7, 2023). After the Court's colloquy of Defendant and her acquiescence to Bankowitz's withdraw, the Court granted Bankowitz's Motion To Withdraw and appointed Winston Hobson ("Hobson" and "Attorney #7"). Thereafter, the Court set a status conference for October 30, 2023 at 10:00AM and set a pretrial conference for November 28, 2023 at 9:00AM. After setting these dates, the Court pointed out the "deterioration" of the working relationship between Defendant and Bankowitz. The Court further cautioned that "if this becomes a problem on another court appointed attorney, I'm going to look more closely at what the alleged disputes are." The Court further advised that there are certain decisions the attorney gets to make and certain decisions a defendant gets to make (i.e., go to trial and/or testify). The Court cautioned as to Defendant's "unrealistic expectations" regarding court appointed counsel and reminded Defendant of her right to retain private counsel.

CC. On October 30, 2023, the status conference was held. Hobson advised as to his conversations with Defendant and setting a status in January 2024. Thereafter, the Court set

a pretrial conference/status as to readiness for trial for January 16, 2024 at 9:00AM and trial during the trial period beginning January 29, 2024.

DD. On January 12, 2024, Hobson filed that certain Motion to Continue; Waiver of *Presence* and requested a three docket continuance.

EE. On January 16, 2024, the Court addressed Hobson's Motion to Continue, granted same, set a pretrial conference for May 3, 2024 at 9:00AM and trial during the trial period beginning May 13, 2024.

FF. On February 1, 2024, Hobson moved to withdraw due to "[i]rreconcilable differences including, but not limited to, ethical considerations."

GG. On February 9, 2024, a hearing was held on Hobson's Motion to Withdraw. Hobson address a "number of issues" as for the basis for withdrawing; including disagreements on legal strategy, on what can and cannot be done, a lack of resources, and Defendant's demands make her difficult to work with, including Defendant taking nonviable legal positions and being unreasonable. As to a key, substantive defense, Hobson advised that the retained an undisclosed expert is not keeping with what Defendant has in mind. The Court advised Defendant that the Court had received a letter from Defendant (a letter dated January 19, 2024). The Court outlined the overriding claims for withdraw by Padilla, Bankowitz, and Hobson; adversarial relationships, lack of satisfaction, and inability to meet Defendant's desires. The Court found that all of Defendant's relationships with all court appointed counsel have deteriorated such that Defendant and the court appointed counsel cannot work together. The Court advised Defendant that although Defendant has a right to court appointed counsel that right is not unlimited. The Court *twice* advised Defendant that Defendant *may not* be provided another court appointed attorney and that Defendant would have to represent

herself *if circumstances similar to Hobson's Motion To Withdraw occur*. The Court further advised Defendant about the dangers of self-representation due Defendant's lack of legal training and knowledge. Defendant never stated that she did not understand that she may not be provided another court-appointed attorney. The Court granted Hobson's Motion To Withdraw and appointed Patricia A. Cashman ("Cashman" and "Attorney #8"). The Court is aware of Cashman's extensive experience representing criminal defendants as both an Assistant Public Defender and in private practice, including representing defendants accused of murder and is widely-known to be able and willing to deal with and manage difficult clients. The Court set a status hearing for April 12, 2024.

HH. On April 12, 2024, the status hearing was held. Cashman advised as to the depositions that had been set, the hiring of an expert, and a request for a future status date to address a trial date. The Court set a status hearing for June 7, 2024.

II. On June 7, 2024, the status hearing was held. Cashman addressed her dates of availability for trial. Defendant was present for the hearing and was sworn. Thereafter, Defendant advised the Court to walking out of at multiple meetings with Cashman, which was confirmed Cashman, utilizing a "pretend judge" to oversee Defendant and Cashman, launching multiple attacks on Cashman's professionalism, and providing the Court with letters dated June 4, 2024 and June 7, 2024 and both of which were filed on June 21, 2024¹⁰. Cashman advised to her efforts and time spent on the case so far (20 hours). Cashman addressed disagreements on legal strategy, including Defendant attaching importance to issues that may not be legally important. In riposte, Defendant accused Cashman of "lie[s]" and "half-truths."

¹⁰ The June 7, 2024 letter sets forth ad hominem attacks on Cashman's professionalism and "untruthful answers." See page 8. The June 4, 2024 letter sets forth ad hominem attacks on Cashman's professionalism. See page 3. Both the June 7, 2024 letter (see page 8) and the June 4, 2024 (see page 2) confirm Defendant disconnecting and/ or walking out of meetings with Cashman.

JJ. On June 11, 2024, Cashman moved to withdraw under Florida Rule Regulating the Florida Bar 4-1.7(b)(2) (substantial risk that the representation of 1 or more clients will be materially limited by the lawyer's responsibilities to another client) and “[i]rreconcilable differences including, but not limited to, ethical considerations, have arisen such that counsel can no longer provide representation.”

KK. On June 28, 2024, a hearing was held on Cashman’s Motion To Withdraw. Cashman relied on Florida Rule Regulating the Florida Bar 4-1.7(b)(2) and *Schwab v. State*, 636 So. 2d 3 (Fla. 1994) as the basis for the withdrawal.

LL. At no time has Defendant refused to accept the services of any of her seven appointed attorneys.

LAW

MM. “Both the United States and the Florida Constitutions guarantee an indigent criminal defendant the right to assistance of appointed counsel. See U.S. Const. amend. VI; Art I, sec. 16, Fla. Const.” *Bowden v. State*, 150 So. 3d 264, 266 (Fla. 1st DCA 2014)

NN. “The Counsel Clause of the Florida Constitution under article I, section 16 recognizes the right to counsel as well as self-representation in all criminal prosecutions.” *Birlkey v. State*, 220 So. 3d 431, 433 (Fla. 4th DCA 2017).

FORFEITURE OF RIGHT TO COUNSEL

OO. A defendant in a criminal case can forfeit a right to court-appointed counsel.

PP. “[A] forfeiture is an extreme measure that flows ‘from the defendant's abuse or manipulation of [the right to counsel] and results in the defendant being required to represent himself even though he has not waived counsel and may still want legal representation.” *K.R. v. Dep’t of Children & Families*, 368 So. 3d 986, 991 (Fla. 4th DCA 2023) citing *Commonwealth v.*

Means, 454 Mass. 81, 907 N.E.2d 646, 652 (2009). Forfeiture is a “judicial response that adapts the course of the legal proceedings to the defendant's choice to engage in misconduct that undermines the legitimate exercise of the right to counsel.” *Id.* citing to *State v. Nisbet*, 134 A.3d 840, 853 n.3 (Me. 2016) citing *Means*, 907 N.E.2d at 652.

QQ. As set forth above, Defendant’s recalcitrance to the attorneys who were not conflicted out (Padilla, Bankowitz, Hobson, and Cashman), antagonism, hostility, and attacks on the professionalism of Padilla (notably, over a year after the fact, see footnote 9 above), of Bankowitz, and of Cashman, and personal attacks on Padilla, Bankowitz, and Cashman¹¹. Each of these attorneys were required to withdraw.

RR. It has become apparent to the Court that Defendant will not permit herself to be represented by anyone. See also *United States v. Travers*, 996 F. Supp. 6, 8-15 and 16-17 (S.D. Fla. 1998).

SS. Additionally, the withdrawal of eight different attorneys, seven of which were court-appointed, leads to a determination that Defendant had forfeited his right to counsel. See *Watson v. State*, 718 So. 2d 253, 253 (Fla. 2d DCA 1998) receded from on other grounds by *Waller v. State*, 911 So. 2d 226, 228 & n.2 (Fla. 2d DCA 2005).

TT. Under Florida law, the facts at bar amount to a binding forfeiture of the right to counsel. See *Jackson v. State*, 2 So. 3d 1036, 1037 (Fla. 3d DCA 2009)¹².

¹¹ See *United States v. Thomas*, 357 F.3d 357, 359-361 and 363 (3d Cir. 2004) which found the misconduct in relationships with four attorneys, including verbal abuse, tearing up correspondence, refusal to cooperate in producing a witness list, hanging up on counsel during a telephone conversation, resulted in a forfeiture of right to counsel.

¹² Citing in part to *United States v. Irorere*, 228 F.3d 816 (7th Cir.2000) and *United States v. McLeod*, 53 F.3d 322 (11th Cir.1995). Forfeiture of the right to counsel can be found through a “pattern of serious misconduct, abuse, threats, and utter failure to collaborate in his own defense.” See also *Com. v. Thomas*, 2005 PA Super 245, ¶ 32, 879 A.2d 246, 258 (2005). Repeated abusive, threatening, and coercive behavior toward counsel can result in the forfeiture of right to counsel. See *United States v. McLeod*, 53 F.3d 322, 326 (11th Cir. 1995).

UU. As the Court finds Defendant has forfeited the right to court-appointed counsel, under Florida law there is no obligation to conduct a *Faretta* hearing or to otherwise warn a defendant of the dangers of proceeding pro se. See *Bowden v. State*, 150 So. 3d 264, 268 (Fla. 1st DCA 2014).

WAIVER BY CONDUCT

VV. The Court can find a waiver by conduct to the right to counsel. “[A] ‘waiver by conduct’ requires that a defendant be warned about the consequences of his conduct, including the risks of proceeding pro se.” *United States v. Goldberg*, 67 F.3d 1092, 1101 (3d Cir. 1995).

WW. On February 9, 2024, Defendant was twice advised that another court appointed attorney may not be provided.

XX. On May 10, 2022, Defendant was advised about the dangers of self-representation

YY. On February 9, 2024, Defendant was advised about the dangers of self-representation.

ZZ. As of February 9, 2024, the instant case had been continued 16 times.

AAA. As of June 26, 2024, this case has been **pending 4 years, 3 months, 5 days** from the date of the filing of the information on March 23, 2020¹³.

BBB. Actions speak louder than words. Although Defendant’s words seemingly reveal a desire to go to trial, however, as set forth herein, her actions and inability to work with court-appointed counsel, are repeated over and over. Allowing Defendant to her eighth court appointed attorney (her ninth attorney overall) will only serve to delay the case further and

¹³ Even taking into account in the impact of the COVID-19 pandemic, and the suspension of criminal trials, this case has been **pending 1 year, 9 months, 9 days**. See In re: Comprehensive Covid-19 Emergency Measures For The Florida State Courts, Fla. Admin. Order No. AOSC20-23 (April 6, 2020) (which suspended criminal jury trials) and In re: Termination Of Specified Covid-19 Emergency Operational Measures To Account For New Rules On Remote Conduct Of Court Proceedings, Fla. Admin. Order No. AOSC22-51 (October 3, 2022).

encourage Defendant to persist in efforts to prevent the resolution of the case on its merits (the concept of which was first brought Defendant's attention on May 10, 2022). Defendant complains that Bankowitz and Hobson (two court-appointed attorneys) failed to meet and communicate and when Defendant is provided court-appointed counsel who will meet and communicate (Cashman), the ways and means of meeting and communicating are unacceptable to Defendant.

CCC. Under Florida law, the facts at bar amount to a binding waiver of the right to counsel. See *Jackson v. State*, 2 So. 3d 1036, 1037 (Fla. 3d DCA 2009)¹⁴

ORDERS AND ADJUDGES AS FOLLOWS:

1. Cashman's *Motion to Withdraw as Counsel* filed June 11, 2024 is GRANTED.
2. As a condition of Cashman's withdrawal, Cashman shall provide the Court an order for costs to obtain transcripts of depositions for the two witnesses Cashman deposed. Upon completion of the transcription of the depositions, the depositions transcripts shall be sent directly to Defendant, SARAH BOONE, by Cashman at the Orange County Jail. Thereafter, Cashman shall file a notice with the Court reflecting that the depositions transcripts were provided to Defendant, SARAH BOONE, and such notice shall include the date sent and the address of Defendant, SARAH BOONE.
3. Defendant, SARAH BOONE, has FORFEITED her right to court-appointed counsel.
4. Alternatively, Defendant, SARAH BOONE, has through WAIVED BY HER CONDUCT her right to court-appointed counsel
5. The Trial Management Conference SHALL REMAIN SPECIALLY SET for Tuesday, September 24, 2024 at 1:30 PM.

¹⁴ See footnote 12.

6. This case SHALL REMAIN SPECIALLY SET FOR TRIAL for the two week trial period beginning Monday, October 7, 2024 and will not be continued for any reason, except by extraordinarily good cause and such extraordinarily good cause shall not include retention of counsel by the Defendant.
7. Any and all pretrial motions in this case must be filed no later than the close of business on Monday, July 22, 2024.

DONE AND ORDERED in Chambers, at Orlando, Orange County, Florida this 28th day of June, 2024.


06/28/2024 14:46:41
2020-CE-001603-A-5
eSigned by Michael Kraynick 06/28/2024 14:46:41 cmUGDEVU

Michael S Kraynick
Circuit Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was filed with the Clerk of the Court this 28th day of June, 2024 by using the Florida Courts E-Filing Portal System. Accordingly, a copy of the foregoing is being served on this day to all attorney(s)/interested parties identified on the ePortal Electronic Service List, via transmission of Notices of Electronic Filing generated by the ePortal System.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to each of said parties by Hand Delivery on this 28th day of June, 2024.

STATE OF FLORIDA

STATE ATTORNEY FOR THE NINTH JUDICIAL
CIRCUIT OF FLORIDA

415 N ORANGE AVE

ORLANDO, FL 32801

SARAH BOONE

VIA HAND DELIVERY

Anita Berrios, Judicial Assistant to Judge Michael S Kraynick