

I. Introduction

This complaint is submitted to the Florida Commission on Ethics to initiate an investigation into State Representative Randall A. Fine for potential ethical violations involving misuse of public office, misapplication of campaign and committee funds for personal legal representation, and false reporting in official capacities.

II. Allegations

It is alleged that State Representative Randall A. Fine used his position and campaign funds from his political committee "Friends of Randy Fine" to improperly benefit himself by paying for legal services in a personal matter, which involved a deposition as a witness in a criminal case unrelated to his duties as a public official.

III. Detailed Chronology and Findings

A. Subpoena and Legal Proceedings

1. On December 12, 2023, Randall Fine was served a subpoena for a deposition as a third-party witness in a criminal case unrelated to his official duties, as stated by Fine himself in a sworn statement to law enforcement.
2. He engaged the services of Attorney Alan Landman, paying him \$20,000 from his PAC, "Friends of Randy Fine," for representation in this and another personal matter.

B. Misuse of Campaign Funds

1. On November 28, 2023, the campaign expenditure report for "Friends of Randy Fine" recorded a \$10,000 payment to the Law Firm of Alan Landman for legal services similarly, to avoid being deposed as a witness in a civil case.
2. On January 8, 2024, the campaign expenditure report for "Friends of Randy Fine" recorded another \$10,000 payment to the Law Firm of Alan Landman for more legal services.
3. These payments were used for personal legal services, specifically to file an Emergency Motion for Protective Order on December 12, 2023 and handle related legal issues, as evidenced by court documents.
4. On March 29, 2024 despite the motion for a protective order, Representative Fine was deposed as subpoenaed, and was represented at the deposition by Alan Landman.

C. False Representations and Misuse of Official Resources

1. Mr. Fine used official state letterhead and his official email to influence court proceedings and law enforcement, misrepresenting his legal situation as related to his duties as a State Representative, which it was not.

2. He attempted to avoid the deposition by falsely claiming scheduling conflicts to delay to the point where he could use F.S. 11.111 to avoid the legal process, and further used his position to press unwarranted and unfounded criminal charges against legal opposition and this complainant.

IV. Applicable Laws and Violations

A. Section 112.31485, Florida Statutes: Prohibition on gifts involving political committees, which may include using committee funds for personal legal expenses not related to campaign activities or public office duties.

B. Section 112.313(6), Florida Statutes: Misuse of public position, as Mr. Fine used his official resources and campaign funds to benefit personally, unrelated to his official functions.

C. Article II Section 8(h), Florida Constitution: Abuse of public position, as Mr. Fine's actions to manipulate legal and law enforcement processes for personal benefit directly contravene this constitutional provision.

D. Misuse of Campaign Funds: Florida Statute 106.11(4) prohibits the use of campaign funds for the personal benefit of any candidate or any other person. Campaign funds are strictly required to be used for expenditures related to the campaign or public office-related activities.

V. Requested Actions

I urge the Florida Commission on Ethics to:

1. Investigate the legitimacy of the expenditure from "Friends of Randy Fine" for \$20,000 paid to Alan Landman's law firm.
2. Review all related documents and communications to assess the misuse of official resources and campaign funds for personal purposes.
3. Take appropriate action to address any ethical violations, including but not limited to sanctions, fines, or other penalties to uphold the integrity of public office.

This complaint is submitted based on a substantial belief backed by documented evidence that State Representative Randall A. Fine has engaged in conduct unbecoming of a public official, misused public and campaign resources, and violated several statutes of Florida's ethics laws. An immediate and thorough investigation is warranted to ensure accountability and ethical governance.

Sincerely,



Robert W. Burns III



Florida Department of State
Division of Elections

Campaign Expenditures

Friends of Randy Fine

This information is being provided as a convenience to the public, has been processed by the Division of Elections and should be cross referenced with the original report on file with the Division of Elections in case of questions.
About the Campaign Finance Data Base

| Rpt Yr | Rpt Type | Date | Amount | Expense Paid To | Address | City State Zip | Purpose | Typ | Reliab |
|--------|----------|------------|-----------|--------------------------------|-----------------------------------|-----------------------------|-----------------------------|-----|--------|
| 2023 | 04 | 10/01/2023 | 4,000.00 | FLORIDA FINANCE STRATEGIES | 111-B EAST COLLEGE AVENUE | TALLAHASSEE, FL 32301 | CONSULTING SERVICES | MON | |
| 2023 | 04 | 10/02/2023 | 59.96 | FLORIDA FINANCE STRATEGIES | 111-B EAST COLLEGE AVENUE | TALLAHASSEE, FL 32301 | SHIPPING COSTS | RMB | |
| 2023 | 04 | 10/06/2023 | 150.00 | PSOMI TAMPA | 701 N. HOWARD AVE. | TAMPA, FL 33606 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 10/06/2023 | 570.00 | BERNS STEAK HOUSE | 1200 S. HOWARD AVE. | TAMPA, FL 33606 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 10/10/2023 | 1.32 | E TOLL AVIS | 5409 AIRPORT SERVICE RD. | TAMPA, FL 33607 | TRAVEL | MON | |
| 2023 | 04 | 10/10/2023 | 25.79 | E TOLL AVIS | 5409 AIRPORT SERVICE RD. | TAMPA, FL 33607 | TRAVEL | MON | |
| 2023 | 04 | 10/25/2023 | 10.07 | HUDSON NEWS | AIRSIDE 2 | ORLANDO, FL 32827 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 10/26/2023 | 25.50 | DOUBLETREE HOTEL | 101 S. ADAMS STREET | TALLAHASSEE, FL 32301 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 10/27/2023 | 39.71 | CURB LV TAXI | 11-11 34TH AVE. | QUEENS, NY 11106 | TRAVEL | MON | |
| 2023 | 04 | 10/30/2023 | 43.66 | BAGEL WORKS | 8177 GLADES RD. | BOCA RATON, FL 33434 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 10/30/2023 | 30.09 | DESERT CAB LAS VEGAS | 4675 S. WYNN RD | LAS VEGAS, NV 89103 | TRAVEL | MON | |
| 2023 | 04 | 10/30/2023 | 151.13 | MATTEOS RESTAURANT | 3355 S. LAS VEGAS BLVD | LAS VEGAS, NV 89109 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 10/30/2023 | 77.09 | SPHERE CONCESSIONS | 3325 S. LAS VEGAS BLVD | LAS VEGAS, NV 89109 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 10/30/2023 | 1,118.95 | VENETIAN PALAZZO | 3325 S. LAS VEGAS BLVD | LAS VEGAS, NV 89109 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 10/31/2023 | 500.00 | ALBA LAW FIRM PLLC | 203 FORT WADE RD, STE 260 | PONTE VEDRA, FL 32081 | COMPLIANCE SERVICES | MON | |
| 2023 | 04 | 10/31/2023 | 361.33 | PINMART | 100 MARTIN LN | ELK GROVE VILLAGE, IL 60007 | ADVERTISING MATERIALS | MON | |
| 2023 | 04 | 10/31/2023 | 23.10 | WANA | 1105 PALMETTO AVE. | MELBOURNE, FL 32901 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 11/01/2023 | 500.00 | FLORIDA STATE GOP PARTY | 420 E. JEFFERSON STREET | TALLAHASSEE, FL 32301 | CONTRIBUTION | MON | |
| 2023 | 04 | 11/08/2023 | 81.48 | TEXT TO SURVEY | 1527 S. COOPER STREET | ARLINGTON, TX 76001 | POLLING, MARKETING | MON | |
| 2023 | 04 | 11/09/2023 | 117.48 | TEXT TO SURVEY | 1527 S. COOPER STREET | ARLINGTON, TX 76001 | POLLING, MARKETING | MON | |
| 2023 | 04 | 11/13/2023 | 20.00 | HILTON HOTEL | 1881 SE 17TH STREET | FT. LAUDERDALE, FL 33316 | TRAVEL | MON | |
| 2023 | 04 | 11/15/2023 | 37.32 | BUC-EE'S | 2330 GATEWAY N DR. | DAYTONA BEACH, FL 32117 | TRAVEL | MON | |
| 2023 | 04 | 11/15/2023 | 4,000.00 | FLORIDA FINANCE STRATEGIES | 111-B EAST COLLEGE AVENUE | TALLAHASSEE, FL 32301 | CONSULTING SERVICES | MON | |
| 2023 | 04 | 11/15/2023 | 1,375.00 | LAW REDD CRONA AND MUNRO | 2075 CENTRE POINTE BLVD. STE. 200 | TALLAHASSEE, FL | ACCOUNTING SERVICES | MON | |
| 2023 | 04 | 11/20/2023 | 334.90 | FRONTIER AIRLINES | 4545 AIRPORT WAY | DENVER, CO 80239 | TRAVEL | MON | |
| 2023 | 04 | 11/20/2023 | 492.90 | SOUTHWEST AIRLINES | 2702 LOVE FIELD DR | DALLAS, TX 75235 | TRAVEL | MON | |
| 2023 | 04 | 11/22/2023 | 15.17 | SPHERE CONCESSIONS | 255 SANDS AVE | LAS VEGAS, NV 89169 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 11/28/2023 | 10,000.00 | LAW FIRM OF ALAN LANDMAN | 7195 MURRELL RD, STE 102 | MELBOURNE, FL 32940 | LEGAL SERVICES | MON | |
| 2023 | 04 | 11/28/2023 | 40.00 | WELLS FARGO | 420 MONTGOMERY ST. | SAN FRANCISCO, CA 94104 | BANK FEES | MON | |
| 2023 | 04 | 11/29/2023 | 700.00 | ALBA LAW FIRM PLLC | 203 FORT WADE RD, STE 260 | PONTE VEDRA, FL 32081 | COMPLIANCE SERVICES | MON | |
| 2023 | 04 | 11/29/2023 | 65.00 | FEDERATED REPUBLICAN WOMEN'S C | 5030 CHAMPION BLVD, G06 #232 | BOCA RATON, FL 33496 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 12/11/2023 | 40.00 | LAZ PARKING | 500 COLLINS AVE | MIAMI BEACH, FL 33131 | TRAVEL | MON | |
| 2023 | 04 | 12/15/2023 | 14.25 | WAFFLE HOUSE | 278 DOUGLAS AVENUE | ALTAMONTE SPRINGS, FL 32714 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 12/15/2023 | 3.75 | CORNER MARKETPLACE | 2020 N. T STREET | PENSACOLA, FL 32505 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 12/18/2023 | 4.23 | WANA | 1105 PALMETTO AVE. | MELBOURNE, FL 32901 | MEALS & ENTERTAINMENT | MON | |
| 2023 | 04 | 12/26/2023 | 4,000.00 | FLORIDA FINANCE STRATEGIES | 111-B EAST COLLEGE AVENUE | TALLAHASSEE, FL 32301 | CONSULTING SERVICES | MON | |
| 2023 | 04 | 12/26/2023 | 632.34 | FLORIDA FINANCE STRATEGIES | 111-B EAST COLLEGE AVENUE | TALLAHASSEE, FL 32301 | FUNDRAISING EVENT | RMB | |
| 2023 | 04 | 12/28/2023 | 500.00 | ALBA LAW FIRM PLLC | 203 FORT WADE RD, STE 260 | PONTE VEDRA, FL 32081 | COMPLIANCE SERVICES | MON | |
| 2023 | 04 | 12/29/2023 | 1,546.00 | ANEDDOT CARD PROCESSING | 1201 W. PEACHTREE, STE 2625 | ATLANTA, GA 30309 | CREDIT CARD PROCESSING FEES | MON | |
| 2023 | 04 | 12/29/2023 | 24.00 | WELLS FARGO BANK | 420 MONTGOMERY ST. | SAN FRANCISCO, CA 94104 | BANK FEES | MON | |
| 2023 | 04 | 12/30/2023 | 1,473.85 | FLORIDA FINANCE STRATEGIES | 111-B EAST COLLEGE AVENUE | TALLAHASSEE, FL 32301 | FUNDRAISING EVENTS | RMB | |
| 2023 | 04 | 12/30/2023 | 1,257.56 | SKYLIFE ELITE | 985 CHARLES LINDBERGH RD | JACKSONVILLE, FL 32225 | TRAVEL | RMB | |

34,471.97

42 Expenditure(s) Selected

[Query the Campaign Finance Data Base](#)



Florida Department of State
Division of Elections

Campaign Expenditures

Friends of Randy Fine

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About the Campaign Finance Data Base

| Rpt Yr | Rpt Type | Date | Amount | Expense Paid To | Address | City State Zip | Purpose | Typ Reimb |
|--------|----------|------------|-----------|--------------------------------|-----------------------------------|------------------------------|-----------------------|-----------|
| 2024 | 01 | 01/05/2024 | 4,000.00 | FLORIDA FINANCE STRATEGIES, LL | 111-B COLLEGE AVE | TALLAHASSEE, FL 32301 | CONSULTING SERVICES | MON |
| 2024 | 01 | 01/06/2024 | 967.98 | LOENS MIAMI BEACH | 1601 COLLINS AVE. | MIAMI BEACH, FL 33139 | TRAVEL | MON |
| 2024 | 01 | 01/06/2024 | 594.82 | COSTCO | 4067 LAGNIAPPE WAY | TALLAHASSEE, FL 32317 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 01/06/2024 | 129.48 | COSTCO | 4067 LAGNIAPPE WAY | TALLAHASSEE, FL 32317 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 01/08/2024 | 10,000.00 | LAW FIRM OF ALAN LANDMAN | 7195 MURRELL RD. STE 102 | MELBOURNE, FL 32940 | LEGAL SERVICES | MON |
| 2024 | 01 | 01/08/2024 | 200.30 | AVENUE | 1201 PEACHTREE RD., STE 2625 | ATLANTA, GA 30309 | CREDIT CARD FEES | MON |
| 2024 | 01 | 01/16/2024 | 266.93 | PUBLIX | 1700 N MONROE STREET | TALLAHASSEE, FL 32303 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 01/19/2024 | 29.73 | FLORIDA FINANCE STRATEGIES, LL | 111-B COLLEGE AVE | TALLAHASSEE, FL 32301 | FED EX | RMB |
| 2024 | 01 | 01/19/2024 | 9,000.00 | THE TYSON GROUP | 1400 VILLAGE SQUARE RD. STE 3-277 | TALLAHASSEE, FL 32312 | POLLING SERVICES | MON |
| 2024 | 01 | 01/19/2024 | 368.19 | HAYWARD HOUSE BISTRO | 228 S ADAMS STREET | TALLAHASSEE, FL 32301 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 01/22/2024 | 195.00 | BOARDS BY ALEXIS LLC | 1307 MAUDE STREET | TALLAHASSEE, FL 32310 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 01/22/2024 | 239.88 | GO DADDY | 2155 E. GO DADDY WAY | TEMPE, AL 85284 | WEBSITE RENEWAL | MON |
| 2024 | 01 | 01/23/2024 | 369.54 | COSTCO | 4067 LAGNIAPPE WAY | TALLAHASSEE, FL 32317 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 01/29/2024 | 500.00 | ALBA LAW FIRM PLLC | 283 FORT MADE RD., SUITE 260 | PONTE VEDRA, FL 32081 | COMPLIANCE SERVICES | MON |
| 2024 | 01 | 02/02/2024 | 135.76 | CHUCKS FISH OF TALLAHASSEE | 224 E. COLLEGE WAY | TALLAHASSEE, FL 32301 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 02/04/2024 | 4,000.00 | FLORIDA FINANCE STRATEGIES, LL | 111-B COLLEGE AVE | TALLAHASSEE, FL 32301 | CONSULTING SERVICES | MON |
| 2024 | 01 | 02/06/2024 | 72.06 | COASTERS PUB | 971 E. EAU GALLIE BLVD. A | MELBOURNE, FL 32937 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 02/12/2024 | 2.34 | MARATHON PETROL | 6458 US 129 | LIVE OAK, FL 32060 | TRAVEL | MON |
| 2024 | 01 | 02/12/2024 | 330.00 | SADDELBROOK RESORT | 570 SADDELBROOK WAY | WESLEY CHAPEL, FL 33543 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 02/12/2024 | 264.38 | SADDELBROOK RESORT | 500 SADDELBROOK WAY | WESLEY CHAPEL, FL 33543 | TRAVEL | MON |
| 2024 | 01 | 02/12/2024 | 7.77 | WALGREENS | 104 S. APOPKA DRIVE | INVERNESS, FL 34452 | COMPLIANCE SERVICES | MON |
| 2024 | 01 | 02/28/2024 | 500.00 | ALBA LAW FIRM PLLC | 283 FORT MADE RD., SUITE 260 | PONTE VEDRA, FL 32081 | COMPLIANCE SERVICES | MON |
| 2024 | 01 | 03/04/2024 | 500.00 | KEN STACKPOLE | 909 OSPREY DRIVE | MELBOURNE, FL 32940 | TRAVEL/FLIGHT | MON |
| 2024 | 01 | 03/04/2024 | 4,000.00 | FLORIDA FINANCE STRATEGIES, LL | 111-B COLLEGE AVE | TALLAHASSEE, FL 32301 | CONSULTING SERVICES | MON |
| 2024 | 01 | 03/05/2024 | 250.13 | HOTEL DUVAL | 415 N MONROE STREET | TALLAHASSEE, FL 32301 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 03/08/2024 | 360.00 | CHABAD OF THE SPACE & TREASURE | 1190 FLORIDA AIA | SATELLITE BEACH, FL 32937 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 03/19/2024 | 36.00 | JERSEY BROTHERS DINER | 2162 HARRIS AVE. NE | PALM BAY, FL 32905 | MEALS & ENTERTAINMENT | MON |
| 2024 | 01 | 03/20/2024 | 91.10 | DELTA AIRLINES | 130 DELTA BLVD | ATLANTA, GA 30354 | TRAVEL | MON |
| 2024 | 01 | 03/20/2024 | 91.10 | DELTA AIRLINES | 1030 DELTA BLVD | ATLANTA, GA 30354 | TRAVEL | MON |
| 2024 | 01 | 03/21/2024 | 86.10 | JET BLUE | 27-01 QUEENS PLAZA | N LONG ISLAND CITY, NY 11101 | TRAVEL | MON |
| 2024 | 01 | 03/21/2024 | 86.10 | JET BLUE | 27-01 QUEENS PLAZA | N LONG ISLAND CITY, NY 11101 | TRAVEL | MON |
| 2024 | 01 | 03/29/2024 | 758.00 | ALBA LAW FIRM PLLC | 283 FORT MADE RD., SUITE 260 | PONTE VEDRA, FL 32081 | COMPLIANCE SERVICES | MON |

38,431.89

32 Expenditure(s) Selected

[Query the Campaign Finance Data Base](#)

[\[Department of State\]](#) [\[Division of Elections\]](#) [\[Candidates and Races\]](#) [\[Campaign Finance Information\]](#)



BREVARD COUNTY SHERIFF'S OFFICE

CASE REPORT

700 S. Park Avenue
Titusville FL 32780

CASE#

2023-00403545

| | | | | |
|-------|--|--|--|------------------------|
| EVENT | REPORTED DATE/TIME 11/17/2023 09:37 | OCCURRED INCIDENT TYPE Information | | |
| | OCCURRED FROM DATE/TIME 10/27/2023 00:00 | OCCURRED THRU DATE/TIME 11/01/2023 00:00 | LOCATION OF OCCURRENCE 1515 SARNO RD, Melbourne FL 32935 | LOCATION ID - A |

| OFFENSES | STATUTE/DESCRIPTION | COUNTS | ATTEMPT/COMMIT |
|----------|---------------------|--------|----------------|
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| SUBJECT | 01 | JACKET/SUBJECT TYPE Adult Complainant | NAME (LAST, FIRST, MIDDLE SUFFIX) FINE, RANDALL ADAM | | | CELLULAR PHONE [REDACTED] | |
| | ADDRESS (STREET, CITY, STATE, ZIP) [REDACTED], Melbourne Beach FL 32951 | | | | | | PHONE #2 [REDACTED] |
| | DOB | AGE or AGE RANGE 49 | SEX Male | RACE White | HEIGHT or RANGE 6'0" 6'0" | WEIGHT or RANGE 180 180 | EYES Brown |
| | DL NUMBER/STATE [REDACTED] / FL | | SSN [REDACTED] | ALIAS (LAST, FIRST, MIDDLE) [REDACTED] | | | |
| | EMPLOYER NAME AND ADDRESS Self Employed | | | SCARS, MARKS OR TATTOOS [REDACTED] | | | |

| | | | | | | | |
|---------|---|---|---|---|-------------------------------------|-------------------------------|------------------------|
| SUBJECT | 02 | JACKET/SUBJECT TYPE Adult Witness | NAME (LAST, FIRST, MIDDLE SUFFIX) FINE, WENDY LEE | | | PRIMARY PHONE [REDACTED] | |
| | ADDRESS (STREET, CITY, STATE, ZIP) [REDACTED], Melbourne Beach FL 32951 | | | | | | PHONE #2 [REDACTED] |
| | DOB | AGE or AGE RANGE 50 | SEX Female | RACE White | HEIGHT or RANGE 5'8" 5'8" | WEIGHT or RANGE [REDACTED] | EYES Unknown |
| | DL NUMBER/STATE [REDACTED] / FL | | SSN [REDACTED] | ALIAS (LAST, FIRST, MIDDLE) [REDACTED] | | | |
| | EMPLOYER NAME AND ADDRESS No Info Available | | | SCARS, MARKS OR TATTOOS [REDACTED] | | | |

I swear/affirm the above and attached statements are true and correct.
 WRITTEN BY: **Matthews Kristopher 2094** DATE: **12/26/2023**
 APPROVED BY: **Caporizzo, Christopher** DATE: **12/28/2023**

Sworn to and subscribed before me the undersigned authority. Notary/Law Enforcement Officer in performance of official duties Personally Known
 NOTARIZED BY: **Caporizzo, Christopher** DATE: **12/28/2023**
Document Electronically Signed



BREVARD COUNTY SHERIFF'S OFFICE

CASE REPORT

700 S. Park Avenue

Titusville FL 32780

CASE #

2023-00403545

ADDITIONAL SUBJECTS

| | | | | | | | | |
|----------------|---|-------------------------------|--|-----------------------------|-------------------------------------|-----------------|--|------|
| SUBJECT | JACKET/SUBJECT TYPE Adult Involved Person | | NAME (LAST, FIRST, MIDDLE SUFFIX) AIANI, JOHN JOSEPH | | | | PRIMARY PHONE (321)288-6317 Work | |
| | ADDRESS (STREET, CITY, STATE, ZIP) 964 SPANISH WELLS DR, Melbourne FL 32940 | | | | | | PHONE #2 | |
| | DOB 08/13/1962 | AGE or AGE RANGE 61 | SEX Male | RACE White | HEIGHT or RANGE 5'7" 5'7" | WEIGHT or RANGE | EYES | HAIR |
| | DL NUMBER/STATE FL | | SSN | ALIAS (LAST, FIRST, MIDDLE) | | | | |
| | EMPLOYER NAME AND ADDRESS Self Employed | | | | SCARS, MARKS OR TATTOOS | | | |

| | | | | | | | | |
|----------------|---|-------------------------------|--|-----------------------------|-------------------------------------|-----------------|--|------|
| SUBJECT | JACKET/SUBJECT TYPE Adult Involved Person | | NAME (LAST, FIRST, MIDDLE SUFFIX) TRAVIS, JESSICA JOANNE | | | | PRIMARY PHONE (321)728-7280 Work | |
| | ADDRESS (STREET, CITY, STATE, ZIP) 275 HIGHWAY A1A, 404, Satellite Beach FL 32937 | | | | | | PHONE #2 | |
| | DOB 03/02/1970 | AGE or AGE RANGE 53 | SEX Female | RACE White | HEIGHT or RANGE 6'0" 6'0" | WEIGHT or RANGE | EYES | HAIR |
| | DL NUMBER/STATE FL | | SSN | ALIAS (LAST, FIRST, MIDDLE) | | | | |
| | EMPLOYER NAME AND ADDRESS Self Employed | | | | SCARS, MARKS OR TATTOOS | | | |

| | | | | | | | | |
|----------------|--|-------------------------------|--|-----------------------------|-------------------------------------|-----------------------------------|--|----------------------|
| SUBJECT | JACKET/SUBJECT TYPE Adult Witness | | NAME (LAST, FIRST, MIDDLE SUFFIX) BUDKO, ANNA VIKTOROVNA | | | | PRIMARY PHONE (321)301-7629 Cellular Phone | |
| | ADDRESS (STREET, CITY, STATE, ZIP) 202 AUGUSTA WAY, Melbourne FL 32940 | | | | | | PHONE #2 | |
| | DOB 04/11/1973 | AGE or AGE RANGE 50 | SEX Female | RACE White | HEIGHT or RANGE 5'6" 5'6" | WEIGHT or RANGE 140 140 | EYES Green | HAIR Brown |
| | DL NUMBER/STATE B320058736310 / FL | | SSN | ALIAS (LAST, FIRST, MIDDLE) | | | | |
| | EMPLOYER NAME AND ADDRESS Self Employed | | | | SCARS, MARKS OR TATTOOS | | | |

| | | | | | | | | |
|----------------|---|-------------------------------|---|-----------------------------|-------------------------------------|-----------------|--|------|
| SUBJECT | JACKET/SUBJECT TYPE Adult Witness | | NAME (LAST, FIRST, MIDDLE SUFFIX) BOND, BRIAN CHRISTOPHER | | | | PRIMARY PHONE (321)431-2525 Cellular Phone | |
| | ADDRESS (STREET, CITY, STATE, ZIP) 1260 CHEB PL NW, Palm Bay FL 32907 | | | | | | PHONE #2 | |
| | DOB 01/14/1998 | AGE or AGE RANGE 25 | SEX Male | RACE White | HEIGHT or RANGE 5'7" 5'7" | WEIGHT or RANGE | EYES | HAIR |
| | DL NUMBER/STATE B530063980140 / FL | | SSN | ALIAS (LAST, FIRST, MIDDLE) | | | | |
| | EMPLOYER NAME AND ADDRESS No Info Available | | | | SCARS, MARKS OR TATTOOS | | | |

GCU - South

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|---|---------------------------|--|---------------------------|
| WRITTEN BY Matthews Kristopher 2094 | DATE 12/26/2023 | APPROVED BY Caporizzo, Christopher | DATE 12/28/2023 |
|---|---------------------------|--|---------------------------|



BREVARD COUNTY SHERIFF'S OFFICE

CASE REPORT

CASE# 2023-00403545

700 S. Park Avenue

Titusville FL 32780

NARRATIVE

Section 1: Narrative

On Wednesday, November 01, 2023, at approximately 1510 hours, I was requested to contact Mr. Randy Fine (Complainant), in reference to harassment investigation.

I made contact with Mr. Fine over the phone and we scheduled to meet each other the next morning to discuss what occurred.

On Thursday, November 02, 2023, at approximately 1000 hours, I responded to Mr. Fine's Office, located at 2539 Palm Bay Road Northeast, Palm Bay, Brevard County, Florida, and made contact with Mr. Fine, who advised the following in substance:

On Friday, October 27, 2023, an unknown male approached Mr. Fine's residence, located at [REDACTED] Melbourne Beach, Brevard County, Florida, and knocked on his front door. Mr. Fine was not home at the time but one of his relatives, a French citizen named "Maxine Reebok", was staying in the residence and answered the door. The male stated he was there to serve Randy Fine with papers and Mr. Reebok stated he would not accept anything and closed the door. The unknown male then taped the papers to the door and left.

On Monday, October 30, 2023, a male, who Mr. Fine presumed was the same male from before, approached his residence and knocked on his front door. Mr. Fine's wife, Mrs. Wendy Fine (Witness), opened the door and the male stated he was there to serve Randy Fine with papers. She refused to take the papers and closed the door.

On the same day, a male approached Mr. Fine's office and began "banging" on the door and windows. For security reasons, Mr. Fine had his office closed to the public and would only allow people access to the building by appointment. Due to the door being locked, the male was unable to enter the office and he began looking through the windows. It should be noted, Mr. Fine had tinting on the windows and doors to prevent someone from being able to easily see inside. Mr. Fine did not have any curtains or blinds in place to prevent someone from being able to see through the tint if they were to get close to the window to see through. Because the male was unable to see through the tint easily, the male began using the camera on his cell phone to see through the tint. This is done by turning on the camera application in your phone and laying it on the tinted glass, which will then allow you to see through the window or door without having to place your face close to it. Mr. Fine stated because of the October 07, 2023 Hamas attack on Israel, he has been hyper vigilant when it comes to his safety and was afraid of the male's intentions. Due to this, he and his Legislative Aide, Ms. Anna Viktorovna Budko (Witness), hid inside the office.

REPORT / CASE CLOSURE INFORMATION

| REPORT / CASE STATUS AND DATE | CASE DISPOSITION AND DATE | EXCEPTIONAL CLEARANCE AND DATE |
|-------------------------------|-----------------------------|--------------------------------|
| Cleared 12/26/2023 | Information Only 12/26/2023 | |

GCU - South

| WRITTEN BY | DATE | APPROVED BY | DATE |
|--------------------------|------------|------------------------|------------|
| Matthews Kristopher 2094 | 12/26/2023 | Caporizzo, Christopher | 12/28/2023 |



BREVARD COUNTY SHERIFF'S OFFICE

CASE REPORT
700 S. Park Avenue
Titusville FL 32780

CASE#
2023-00403545

NARRATIVE (continuation)

The male then spent approximately fifteen minutes “banging” on the door and windows and asking to be let inside. The male then went to his vehicle, a light colored GMC sport utility vehicle, and after approximately an hour, he left.

At one point during the incident, Mr. Fine approached the window and photographed the male who was knocking. Mr. Fine then stated he reviewed the pictures and noticed the male was wearing a shirt with Pinstripe Investigations printed on the front. He then researched the company and found the owner was Mr. John Aiani (Involved). Mr. Fine then stated he believed this was the male who was knocking on the front of his office, due to the male being the same approximate age as the owner of the business. Mr. Fine sent me the pictures he took of the male. The pictures were placed on an agency issued thumb drive and entered into an evidence locker at South Precinct.

He then stated later in the afternoon he received a voicemail from Ms. Jessica Travis (Involved), which stated her investigator, “John”, is trying to serve you with a subpoena and if you don’t want the video released, you will come outside and accept the subpoena.

I then listened to the voicemail on Mr. Fine’s answering machine, which consisted of the following in substance: The person identifies themselves as “Attorney Jessica Travis” and says their investigator is attempting to serve a subpoena on Mr. Fine. They proceed to say if Mr. Fine does not accept the service they will file a motion and make the video public in that respect. They end the message with requesting Mr. Fine to either call Ms. Travis or walk outside and accept the service from “John”.

I then made contact with Ms. Budko, who advised the following in substance: On Monday, October 30, 2023, Ms. Budko was sitting at the front desk, which is directly in front of the door. A male approached the door and began knocking. Due to the security threats, she has been instructed to not open the door for people if they do not have an appointment. She stated she believed it occurred around 1200 hours because every Monday at 1200 hours, she facetimes her family in Ukraine. She would normally step outside of the office to speak with her family but due to the male being outside the door, she was unable to step outside, so she notified her family, via Skype, she would be unable to talk to them. The male knocked on the door repeatedly for ten to fifteen minutes. After approximately fifteen minutes, he walked away and she believed he left. Approximately thirty to forty minutes later, he returned to the door and began knocking on the door and windows. She could not remember exactly what the male was yelling but explained it as “Randy Fine”, “I am here to serve you”, and “just come out and accept the service”. After a few minutes, the male stopped yelling and she looked out of her office. She saw Mr. Fine’s office door was open and could see the male standing in front of his window holding something against the glass. She stated at the time she did not know it was a cell phone but now knows it was. She stated she was never nervous or afraid of the male during this incident and the reason she was hiding in her office was because they pretend nobody is in the office anytime someone approaches their door.

GCU - South

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| WRITTEN BY Matthews Kristopher 2094 | DATE 12/26/2023 | APPROVED BY Caporizzo, Christopher | 12/28/2023 |
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BREVARD COUNTY SHERIFF'S OFFICE

CASE REPORT
700 S. Park Avenue
Titusville FL 32780

CASE#
2023-00403545

NARRATIVE (continuation)

I then made contact with Mr. Brian Bond (Witness), who advised the following in substance: He was sitting at his desk and heard a commotion outside and looked to see what was going on. When he looked outside, he saw a male banging on Mr. Fine's windows and doors. The male was yelling he was a process server and he needed to serve Mr. Fine with some paperwork. The male continued to yell and knock on the doors and windows for approximately thirty minutes. The male walked away from Mr. Fine's office and into the parking lot. An unknown amount of time later, Mr. Bond walked outside to take a phone call and the male exited his vehicle and yelled at Mr. Bond. He said he was recording Mr. Bond and to tell Mr. Fine to come outside. Mr. Bond told him he did not have a way to contact Mr. Fine and the male continued to tell him "come on, bro" and "just help me out". Mr. Bond then walked back inside his office and the male left the area shortly after.

I then returned to the Brevard County Sheriff's Office South Precinct and confirmed the male who Mr. Fine photographed was Mr. Aiani. Through investigative means, I located Mr. Aiani's address, 964 Spanish Wells Drive, Melbourne, Brevard County, Florida.

On November 03, 2023, I responded to 964 Spanish Wells Drive and attempted to speak with Mr. Aiani. He did not answer the door or his Ring doorbell camera.

On November 06, 2023, I responded back out to 964 Spanish Wells Drive and attempted to speak with Mr. Aiani again. He did not answer the door or his Ring doorbell camera.

I then responded to 1370 Bedford Drive Suite 104, Melbourne, Brevard County, Florida, and made contact with Ms. Travis, who advised the following in substance: She was representing clients for two separate cases where Mr. Fine was listed as a witness. She hired Mr. Aiani to serve Mr. Fine with the subpoenas. She stated she was made aware after the fact that Mr. Aiani was not on the certified process server list, which was maintained by the Clerk of Courts.

On Monday, October 30, 2023, Mr. Aiani was attempting to serve Mr. Fine with a subpoena. He called Ms. Travis and informed her "oh, they're there, but they're not coming to the door". She informed Mr. Aiani there were perceived threats made against Mr. Fine so she would call him and let him know Mr. Aiani was there to serve a subpoena for her. She stated nobody answered so she left a voicemail for Mr. Fine. She stated the reason Mr. Fine was not wanting to be served was because he did not like her client and did not want to testify in the ongoing case. She stated she had no intentions to extort Mr. Fine and was merely letting him know if he did not accept the subpoena, she would file a motion with the court and submit the video of him hiding behind his desk to the court. She stated the motion would be public record and anyone, including the press, could request copies of the video.

Ms. Travis then stated she wanted to cooperate with the investigation in any way she could and stated she would

GCU - South

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| WRITTEN BY Matthews Kristopher 2094 | DATE 12/26/2023 | APPROVED BY Caporizzo, Christopher | 12/28/2023 |
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BREVARD COUNTY SHERIFF'S OFFICE

CASE REPORT

700 S. Park Avenue
Titusville FL 32780

CASE #

2023-00403545

NARRATIVE (continuation)

provide me with all of the media she had from Mr. Aiani. She stated due to the size of the file, she would email me a link to download the files.

On Monday, November 20, 2023, Ms. Travis emailed me a link to Google Drive. I utilized the secure computer located at South Precinct to connect to the link and download the files. I then reviewed the files and observed multiple videos, pictures, and a PDF file. The pictures were of vehicles and their tags. The videos were of the attempted services on Mr. Fine. The PDF file was a timeline of events documenting the attempted services. All of the files were saved to an agency provided thumb drive. The thumb drive was entered into an evidence locker at South Precinct.

On Tuesday, December 19, 2023, Mr. Fine contacted the Brevard County Sheriff's Office Legal Counsel. The email was forwarded to me to add to this case. A copy of the email was printed and added as an enclosure.

Based on the above investigation and witness statements, as of December 26, 2023, there is insufficient evidence to support an arrest for any of the parties involved.

Section 2: Crime Scene

The incident occurred at 2539 Palm Bay Road Northeast, Palm Bay, Brevard County, Florida.

Photographs were taken of the scene utilizing my department issued iPhone.

All interviews were recorded utilizing my department issued digital audio recorder.

All photographs and audio collected by me were uploaded to the BCSO digital media server.

The thumb drive that was collected from Ms. Travis was entered into an evidence locker at South Precinct.

Section 3: Disposition

This case is closed and referred to file for informational purposes only.

Section 4: Enclosures

- 1) Property Receipt
- 2) Copy of Email (Mr. Fine)

GCU - South

WRITTEN BY

Matthews Kristopher 2094

DATE

12/26/2023

APPROVED BY

Caporizzo, Christopher

12/28/2023



BREVARD COUNTY SHERIFF'S OFFICE

CASE REPORT

700 S. Park Avenue
Titusville FL 32780

CASE #

2023-00403545

NARRATIVE (continuation)

3) Media (Photographs and Audio)

GCU - South

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| WRITTEN BY Matthews Kristopher 2094 | DATE 12/26/2023 | APPROVED BY Caporizzo, Christopher | 12/28/2023 |
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IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT,
IN AND FOR BREVARD COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASE: 05-2023-CF-045900-AXXX-XX

ROBERT WILLIAMS BURNS III,

Defendant.

**AMENDED NOTICE OF TAKING
AUDIO-VISUALLY RECORDED DEPOSITION**

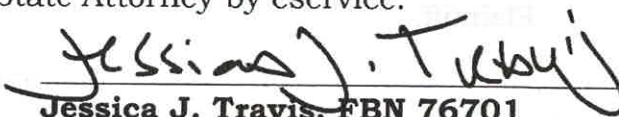
COMES NOW undersigned counsel and gives notice that the following people are to appear in person before Huseby Reporting, at the Veira Courthouse located at 2825 Judge Fran Jamieson Way, Melbourne, FL 32940, and videographer Seth Headley, or other persons authorized by law to take depositions, at the locations listed below for the taking of audio-visually recorded depositions for the purposes of discovery, for use at trial or for such other purpose as authorized by law..

| <u>Thursday, December 7th, 2023,</u> | <u>Location</u> | <u>Witness & Method</u> |
|---|-----------------|-----------------------------|
| 9:00 a.m. | Depo Room 32 | Yarda Horka (45mins) |
| 9:45 a.m. | Depo Room 32 | Karen Colby (1.5hrs) |
| <u>Wednesday, December 20th, 2023,</u> | <u>Location</u> | <u>Witness & Method</u> |
| 2:00 p.m. | Depo Room 41 | Randy Fine (2hrs) |

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CERTIFICATE OF SERVICE

I certify that on November 8th, 2023, copies of the foregoing document have been provided to the Office of the State Attorney by eservice.

By: 

Jessica J. Travis, FBN 76701
Attorney for Defendant
DefendBrevard.com
1370 Bedford Drive, Suite 104
Melbourne, FL 32940
Ph: 321 - 728 - 7280
Fx: 321 - 728 - 8020
Eservice: eservice1@DefendBrevard.com
Eservice: eservice2@DefendBrevard.com

IN THE CIRCUIT COURT OF THE
EIGHTEENTH JUDICIAL CIRCUIT IN AND
FOR BREVARD COUNTY, FLORIDA

CIRCUIT FELONY DIVISION

CASE NO: 05-2023-CF-045900-XXXX-XX

STATE OF FLORIDA,

Plaintiff,

vs.

ROBERT WILLIAM BURNS, III,

Defendants.

**LIMITED NOTICE OF APPEARANCE
AND DESIGNATION OF EMAIL ADDRESS**

Alan H. Landman, Esq. hereby enters this Limited Notice of Appearance for the purpose of representing **Randy Fine**, as his attorney with respect to filing of a Motion for Protective Order and any issues / hearing related thereto with respect to the referenced individual's deposition in the captioned matter.

The primary e-mail address for service of pleadings in the captioned matter pursuant to Florida Rule of Judicial Administration 2.516(b)(1)(A) is: alan@alandmanpa.com.

CERTIFICATE OF SERVICE

I CERTIFY that a true and correct copy of the foregoing has been furnished on December 13, 2023 via the E-Filing Portal to Jessica Travis, Esq. and the Office of the State Attorney.

/s/ Alan H. Landman

ALAN H. LANDMAN, ESQ.

7195 Murrell Road, Suite 102

Melbourne, Florida 32940

Phone: (321) 242-9800

Fax: (321) 242-9955

Email: alan@alandmanpa.com

Fla. Bar. No. 0745472

Attorney (limited) for Randy Fine

IN THE CIRCUIT COURT OF THE
EIGHTEENTH JUDICIAL CIRCUIT IN AND
FOR BREVARD COUNTY, FLORIDA

CIRCUIT FELONY DIVISION

STATE OF FLORIDA,

Plaintiff,

CASE NO: 05-2023-CF-045900-XXXX-XX

vs.

ROBERT WILLIAM BURNS, III,

Defendants.

_____ /

EMERGENCY MOTION FOR PROTECTIVE ORDER

RANDY FINE, by and through undersigned counsel, pursuant to Fla.R.Cr.Pr. 3.220(l) (*as well as any other applicable rules of procedure*), hereby requests the Court to enter a protective order as it relates to his deposition currently scheduled for **12/20/23** commencing at 2:00 p.m. and as grounds therefore shows:

1. Undersigned counsel was retained for the limited purpose of filing the instant Emergency Motion and addressing any issues / hearing related hereto.

2. Undersigned counsel has little (if any) “substantive” knowledge of the underlying facts and circumstances in the captioned case as of the drafting of the instant Emergency Motion.

3. On 12/1/20 at 10:45 a.m., Randy Fine was served with a Subpoena for Deposition. **Fla.R.Cr.Pr. 3.220(h)(1)** states in pertinent part . . . a party taking a deposition shall give reasonable written notice to each other party and shall make a good faith effort to coordinate the date, time, and location of the deposition to accommodate the schedules of other parties **and the witness to be deposed.**

4. At no time prior to being served with the Subpoena was Mr. Fine contacted in an effort to coordinate his deposition.

5. Undersigned counsel is UNAVAILABLE to appear with Mr. Fine for the currently scheduled deposition due to conflicting court proceedings. More specifically, a time certain trial in Nesbitt v. Nesbitt before the Honorable Kathryn Speicher on 12/18/23 - 12/21/23 from 9:30 a.m. - 5:00 p.m. (day 8 of trial).

6. Mr. Fine is a Member of the Florida House of Representatives and entitled to all rights and privileges as contained in Florida Statute 11.111.

7. The captioned matter is scheduled for docket sounding on 12/20/23 at 9:00 a.m. Since the case is not scheduled for trial, nor does there appear to be any speedy trial issues, there is no time sensitivity to Mr. Fine's deposition.

8. As a result of the above, undersigned counsel requests the Court conduct an expedited hearing by Microsoft Teams on the instant Emergency Motion and thereafter enter a Protective Order with respect to Mr. Fine's deposition scheduled on 12/20/23. Undersigned counsel intends to email the instant Emergency Motion to the Court's Judicial Assistant requesting a hearing in "good faith" and is notifying Defendant's counsel that the witness will NOT be present for his deposition as currently scheduled. *If Defendant's counsel incurs fees and costs associated with same, she does so at her own risk.*

WHEREFORE, undersigned counsel requests the Court conduct an expedited hearing and grant the relief requested above.

CERTIFICATE OF SERVICE

I CERTIFY that a true and correct copy of the foregoing has been furnished on December 13, 2023 via the E-Filing Portal to Jessica Travis, Esq. and the Office of the State Attorney.

/s/ Alan H. Landman

ALAN H. LANDMAN, ESQ.
7195 Murrell Road, Suite 102
Melbourne, Florida 32940
Phone: (321) 242-9800
Fax: (321) 242-9955
Email: alan@alandmanpa.com
Fla. Bar. No. 0745472
Attorney (limited) for Randy Fine

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT,
IN AND FOR BREVARD COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASE: 05-2023-CF-045900-AXXX-XX

ROBERT WILLIAMS BURNS III,

Defendant.

_____ /

NOTICE OF WITHDRAWING
MOTION FOR ORDER TO SHOW CAUSE

COMES NOW the Defendant, by and through undersigned counsel, and hereby gives notice that he hereby withdraws Robert Burns' Motion For Order To Show Cause Requiring Randy Fine To Show Why He Should Not Be Held Contempt Of Court For Failing To Appear For Deposition And For Sanctions (Dk. 62) because Randy Fine appeared for deposition on March 29, 2024.

CERTIFICATE OF SERVICE

I certify that on the 2nd day of April 2024, copies of the foregoing document have been provided to the Office of the State Attorney and attorney Alan Landman, counsel for Randy Fine, by eservice.



JESSICA J. TRAVIS, FBN 76701

Attorney for Robert Burns

DefendBrevard.com

1370 Bedford Drive, Suite 104

Melbourne, FL 32940

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