



Florida Commission on Ethics
P. O. Drawer 15709, Tallahassee, Florida 32317-5709
"A Public Office is a Public Trust"

FLORIDA
COMMISSION ON ETHICS

JUN 24 2024

RECEIVED
ORIGINAL

COMPLAINT

24-134

1. PERSON BRINGING COMPLAINT:

Name: Robert Burns Telephone Number: 4078103200
Address: 3146 Verdi Cir
City: Palm Bay County: Brevard State: FL Zip Code: 32905

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Use a separate complaint form for each person you wish to complain against:

Name: Randall Fine Telephone Number: 3219876101
Address: 103 Oak St
City: Melbourne Beach County: Brevard Zip Code: 32951
Title of office or position held or sought: State Representative 33/Florida Senate 19

3. STATEMENT OF FACTS:

Please provide a full explanation of your complaint, describing the facts and the actions of the person named above and why you believe he or she violated the law. Include relevant dates and the names and addresses of persons whom you believe may be witnesses. Please do not submit more than 15 pages, including this form. Please do not submit video or audio tapes, CDs, DVDs, flash drives or other electronic media; such material will not be considered part of the complaint and will be returned.

4. OATH

I, the person bringing this complaint, do swear or affirm that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge and belief.

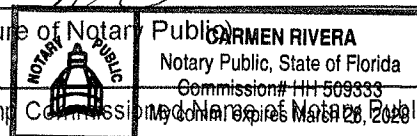
[Signature]
SIGNATURE OF COMPLAINANT

STATE OF Florida
COUNTY OF Brevard

Sworn to (or affirmed) and subscribed before me by means of ☒ physical presence or ☐ online notarization, this 7th day of June, 2024, by Robert Burns (name of person making statement)

[Signature]
(Signature of Notary Public)

(Print, Type, or Stamp Commission Expires March 28, 2026)



Personally Known ☐ OR Produced Identification ☒
Type of Identification Produced: FIDC

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 Reimb
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	BURNS STEAK HOUSE	1200 S. HOWARD AVE.	TAMPA, FL 33606	MEALS & ENTERTAINMENT	MON
2023	04	10/10/2023	1.32	E TOLL AVIS	5400 AIRPORT SERVICE RD.	TAMPA, FL 33607	TRAVEL	MON
2023	04	10/10/2023	25.79	E TOLL AVIS	5400 AIRPORT SERVICE RD.	TAMPA, FL 33607	TRAVEL	MON
2023	04	10/25/2023	10.87	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	38.09	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	1,110.95	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	180 MARTIN LN	ELK GROVE VILLAGE, IL 60007	ADVERTISING MATERIALS	MON
2023	04	10/31/2023	23.18	WAWA	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	1801 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	334.98	FRONTIER AIRLINES	4545 AIRPORT WAY	DENVER, CO 80239	TRAVEL	MON
2023	04	11/20/2023	492.98	SOUTHWEST AIRLINES	2702 LOVE FIELD DR	DALLAS, TX 79235	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	WAWA	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	ANEDOT 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	RMB
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	MON

34,471.97

42 Expenditure(s) Selected

Query the Campaign Finance Data Base

(Department of State) (Division of Elections) (Candidates and Races) (Campaign Finance Information)

4



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 Reimb
2024	Q1	01/05/2024	4,000.00	FLORIDA FINANCE STRATEGIES, LL	111-B COLLEGE AVE	TALLAHASSEE, FL 32301	CONSULTING SERVICES	NON
2024	Q1	01/06/2024	967.98	LOEWS MIAMI BEACH	1601 COLLINS AVE.	MIAMI BEACH, FL 33139	TRAVEL	NON
2024	Q1	01/06/2024	594.02	COSTCO	4067 LAGNIAPPE WAY	TALLAHASSEE, FL 32317	MEALS & ENTERTAINMENT	NON
2024	Q1	01/06/2024	129.48	COSTCO	4067 LAGNIAPPE WAY	TALLAHASSEE, FL 32317	MEALS & ENTERTAINMENT	NON
2024	Q1	01/08/2024	10,000.00	LAW FIRM OF ALAN LANDMAN	7195 MURRELL RD., STE 102	MELBOURNE, FL 32940	LEGAL SERVICES	NON
2024	Q1	01/08/2024	200.30	ANEDOT	1201 PEACHTREE RD., STE 2625	ATLANTA, GA 30309	CREDIT CARD FEES	NON
2024	Q1	01/16/2024	266.93	PUBLIX	1700 N MONROE STREET	TALLAHASSEE, FL 32303	MEALS & ENTERTAINMENT	NON
2024	Q1	01/19/2024	29.73	FLORIDA FINANCE STRATEGIES, LL	111-B COLLEGE AVE	TALLAHASSEE, FL 32301	FED EX	NON
2024	Q1	01/19/2024	9,000.00	THE TYSON GROUP	1400 VILLAGE SQUARE RD. STE 3-277	TALLAHASSEE, FL 32312	POLLING SERVICES	NON
2024	Q1	01/19/2024	368.19	HAYWARD HOUSE BISTRO	228 S ADAMS STREET	TALLAHASSEE, FL 32301	MEALS & ENTERTAINMENT	NON
2024	Q1	01/22/2024	195.00	BOARDS BY ALEXIS LLC	1307 MAUDE STREET	TALLAHASSEE, FL 32310	MEALS & ENTERTAINMENT	NON
2024	Q1	01/22/2024	239.88	GO DADDY	2155 E. GO DADDY WAY	TEMPE, AL 85284	WEBSITE RENEWAL	NON
2024	Q1	01/23/2024	369.54	COSTCO	4067 LAGNIAPPE WAY	TALLAHASSEE, FL 32317	MEALS & ENTERTAINMENT	NON
2024	Q1	01/29/2024	500.00	ALBA LAW FIRM PLLC	203 FORT WADE RD., SUITE 260	PONTE VEDRA, FL 32081	COMPLIANCE SERVICES	NON
2024	Q1	02/02/2024	135.76	CHUCKS FISH OF TALLAHASSEE	224 E. COLLEGE WAY	TALLAHASSEE, FL 32301	MEALS & ENTERTAINMENT	NON
2024	Q1	02/04/2024	4,000.00	FLORIDA FINANCE STRATEGIES, LL	111-B COLLEGE AVE	TALLAHASSEE, FL 32301	CONSULTING SERVICES	NON
2024	Q1	02/06/2024	72.06	COASTERS PUB	971 E. EAU GALLIE BLVD. A	MELBOURNE, FL 32937	MEALS & ENTERTAINMENT	NON
2024	Q1	02/12/2024	2.34	MARATHON PETROL	6458 US 129	LIVE OAK, FL 32060	TRAVEL	NON
2024	Q1	02/12/2024	330.00	SADDLEBROOK RESORT	570 SADDLEBROOK WAY	WESLEY CHAPEL, FL 33543	MEALS & ENTERTAINMENT	NON
2024	Q1	02/12/2024	264.38	SADDLEBROOK RESORT	500 SADDLEBROOK WAY	WESLEY CHAPEL, FL 33543	TRAVEL	NON
2024	Q1	02/12/2024	7.77	WALGREENS	104 S. APOPKA DRIVE	INVERNESS, FL 34452	MEALS & ENTERTAINMENT	NON
2024	Q1	02/28/2024	500.00	ALBA LAW FIRM PLLC	203 FORT WADE RD., SUITE 260	PONTE VEDRA, FL 32081	COMPLIANCE SERVICES	NON
2024	Q1	03/04/2024	500.00	KEN STACKPOLE	909 OSPREY DRIVE	MELBOURNE, FL 32940	TRAVEL/FLIGHT	NON
2024	Q1	03/04/2024	4,000.00	FLORIDA FINANCE STRATEGIES, LL	111-B COLLEGE AVE	TALLAHASSEE, FL 32301	CONSULTING SERVICES	NON
2024	Q1	03/05/2024	258.13	HOTEL DUVAL	415 N MONROE STREET	TALLAHASSEE, FL 32301	MEALS & ENTERTAINMENT	NON
2024	Q1	03/08/2024	360.00	CHABAD OF THE SPACE & TREASURE	1190 FLORIDA A1A	SATELLITE BEACH, FL 32937	MEALS & ENTERTAINMENT	NON
2024	Q1	03/19/2024	36.00	JERSEY BROTHERS DINER	2162 HARRIS AVE. NE	PALM BAY, FL 32905	MEALS & ENTERTAINMENT	NON
2024	Q1	03/20/2024	91.10	DELTA AIRLINES	130 DELTA BLVD	ATLANTA, GA 30354	TRAVEL	NON
2024	Q1	03/20/2024	91.10	DELTA AIRLINES	1030 DELTA BLVD	ATLANTA, GA 30354	TRAVEL	NON
2024	Q1	03/21/2024	86.10	JET BLUE	27-01 QUEENS PLAZA	N LONG ISLAND CITY, NY 11101	TRAVEL	NON
2024	Q1	03/21/2024	86.10	JET BLUE	27-01 QUEENS PLAZA	N LONG ISLAND CITY, NY 11101	TRAVEL	NON
2024	Q1	03/29/2024	750.00	ALBA LAW FIRM PLLC	203 FORT WADE RD., SUITE 260	PONTE VEDRA, FL 32081	COMPLIANCE SERVICES	NON

30,431.89

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

01 SUBJECT	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 [REDACTED]	AGE or AGE RANGE 49	SEX Male	RACE White	HEIGHT or RANGE 6'0" 6'0"	WEIGHT or RANGE 180 180	EYES Brown	HAIR Brown
	DL NUMBER/STATE [REDACTED] / FL			SSN [REDACTED]	ALIAS (LAST, FIRST, MIDDLE) [REDACTED]			
	EMPLOYER NAME AND ADDRESS Self Employed				SCARS, MARKS OR TATTOOS [REDACTED]			

02 SUBJECT	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 [REDACTED]	AGE or AGE RANGE 50	SEX Female	RACE White	HEIGHT or RANGE 5'8" 5'8"	WEIGHT or RANGE [REDACTED]	EYES Unknown	HAIR Blonde
	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.
GCU - South

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**

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

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

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

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

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 32780CASE# **2023-00403545****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 Cleared 12/26/2023	CASE DISPOSITION AND DATE Information Only 12/26/2023	EXCEPTIONAL CLEARANCE AND DATE
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)

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

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)

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

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)

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



BREVARD COUNTY SHERIFF'S OFFICE

CASE REPORT

700 S. Park Avenue
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CASE #

2023-00403545

NARRATIVE (continuation)

3) Media (Photographs and Audio)

GCU - South

WRITTEN BY

Matthews Kristopher 2094

DATE

12/26/2023

APPROVED BY

Caporizzo, Christopher

12/28/2023

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..

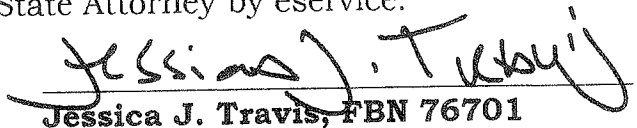
<u>Thursday, December 7th, 2023,</u>	<u>Location</u>	<u>Witness & Method</u>
9:00 a.m.	Depo Room 32	Yarda Horka (45mins)
9:45 a.m.	Depo Room 32	Karen Colby (1.5hrs)
<u>Wednesday, December 20th, 2023,</u>	<u>Location</u>	<u>Witness & Method</u>
2:00 p.m.	Depo Room 41	Randy Fine (2hrs)

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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

STATE OF FLORIDA,

Plaintiff,

vs.

ROBERT WILLIAM BURNS, III,

Defendants.

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

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.

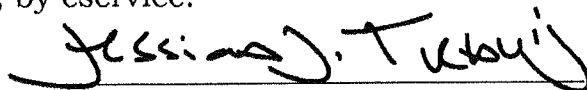
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NOTICE OF WITHDRAWING
MOTION FOR ORDER TO SHOW CAUSE

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

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19