

Memo

To: Readers of the Resources section of my web site

**From: Michael A. Catalano, P.A.
Attorney at Law
1531 N.W. 13 Court
Miami, FL 33125
305-325-9818
Fax 305-325-8759
Email: mclawyer@bellsouth.net**

Re: Sandra Veiga Investigation

This is memo number 4. This PDF consists of 8 pages total.

These are my public records requests to the Dade SAO, Broward, SAO, Judge Farina and FDLE.

LAW OFFICES
MICHAEL A. CATALANO, P.A.
ATTORNEY AT LAW

1531 N.W. 13TH COURT
MIAMI, FLORIDA 33125

October 27, 2008

TELEPHONE: (305) 325-9818
FAX: (305) 325-8759
MCLAWYER@BELLSOUTH.NET

Jennifer L. Keegan
Custodian of Records
Florida Department of Law Enforcement
Alcohol Testing Program
P.O. Box 1489
Tallahassee, Florida 32302

Also emailed to: JenniferKeegan@fdle.state.fl.us

Re: FDLE Inspector Sandra Veiga
PUBLIC RECORDS REQUEST

Dear Ms. Keegan:

Pursuant to the Florida Public Records Request Law 119, I hereby request to obtain a copy of any and all documents, emails, memos etc. involving former FDLE Inspector Sandra Veiga and the investigation that led to her being terminated.

I have already obtained, from other sources, a copy of the following:

1. Letter from Laura Barfield to Miami-Dade Sgt. Harris dated 7/29/08.
2. Notice of Dismissal issued to inspector Veiga dated 10/7/08.
3. The FDLE Internal Investigation Report dated 8/22/08 by Joseph Demma that is 25 pages long.

(I do not need another copy of these).

By this letter, I also request a copy of any and all records concerning this incident, including but not limited to, any and all "documentation and sworn testimony" taken in this matter, e-mails, regular mail correspondence, etcetera, as it concerns to Sandra Veiga being terminated. In other words, I want to see everything you have about this investigation.

Kindly mail copies of the requested items to me at the address listed above, or you may e-mail them to me at mclawyer@bellsouth.net. Thank you for your time and attention to this matter.

I would imagine that you will receive more than 50 similar requests. If you send this all to me soon or by email, I will gladly share this with other lawyers and hopefully cut down on the number of requests you will receive.

Very truly yours,



Michael A. Catalano

MAC/or

FLORIDA DEPARTMENT OF LAW ENFORCEMENT'S
SUMMARY REGARDING CHARGES FOR PROVIDING
RECORDS REQUESTED UNDER CHAPTER 119, FLORIDA STATUTES

Upon payment of the fee prescribed by law or as established by Section 119.07(4), Florida Statutes, requested copies of public records will be provided.

The Florida Department of Law Enforcement imposes the following charges for such copies:

Duplicated copies:	(not more than 8 1/2 x 14 inches) \$.15 per one-sided copy;
All other copies:	Actual cost of duplication of the record. (cost of materials and supplies used to duplicate the record, not including labor cost or overhead cost associated with such duplication)
Certification of a copied record:	\$1.00 per certified record.
Criminal History copy:	Fee established by Rule (As authorized by statute.) Currently \$24.00 per history requested
Other costs:	

Pursuant to Section 119.07(4)(d), Florida Statutes, if the nature or volume of the public records requested to be inspected, examined, or copied is such as to require extensive use of information technology resources or extensive clerical or supervisory assistance by personnel of FDLE, or both, a charge in addition to the actual cost of duplication will be assessed. Regarding labor costs, FDLE currently assesses a charge for personnel time at the hourly salary rate of personnel involved when clerical and/or supervisory assistance necessary to respond to a request exceeding four hours. No labor charge is assessed for up to and including four hours of clerical or supervisory personnel efforts.

FDLE as a state agency is prohibited from extending credit. The statutorily-authorized costs associated with a public records request normally must be paid prior to this Department providing the requested records. Any requestor having questions is encouraged to contact the FDLE Office of General Counsel.

Michael A Catalano

From: Gapinski, Gerri [GerriGapinski@fdle.state.fl.us]
Sent: Thursday, November 06, 2008 12:14 PM
To: 'mclawyer@bellsouth.net'
Cc: Floyd, Jason
Subject: Copying charge re: documents and sworn testimony -- Sandra Veiga Internal Investigation (our docket # PRR 2008-1267)
Importance: High.

Dear Mr. Catalano:

RE: Public records request PRR 2008-1267
 Request for Documentation and Sworn Testimony of Witnesses - case # EI-79-1370 - Sandra Veiga Internal Inv.

Dear Mr. Catalano:

A response to your request consists of 75 pages and 1 CD. At the copying rate of \$.15 per page, and \$2.00 per CD, the copying cost amounts to \$13.25. Please send your check for \$13.25, payable to the Florida Department of Law Enforcement, addressed as follows:

Office of General Counsel
 Florida Department of Law Enforcement
 ATTN: James D. Martin
 P.O. Box 1489
 Tallahassee, FL 32302

The pages consist of the documents referenced on pages 2 and 3 of the 17-page Internal Investigation Report, and also additional documents maintained within the case file. The CD contains the sworn testimony of the following persons: Pablo Espinoza, Lazaro Ley, Kevin Millan, Sandra Veiga, and Kimberly Velazquez. With the exception of the 17-page Internal Inv. Report, these are the only other items maintained within the case file. The materials will be mailed to you upon receipt of your payment.

PLEASE CONFIRM RECEIPT OF THIS E-MAIL.

Gerri Gapinski
 Office of General Counsel

MICHAEL A. CATALANO, P.A.
 ATTORNEY AT LAW
 OPERATING ACCOUNT (305)325-9818
 1531 N.W. 13TH COURT
 MIAMI, FL 33125

8458

11/6/2008

PAY TO THE ORDER OF FDLE

\$ **13.25

Thirteen and 25/100

DOLLARS

Veiga File

MEMO

LAW OFFICES
MICHAEL A. CATALANO, P.A.
ATTORNEY AT LAW

1531 N.W. 13TH COURT
MIAMI, FLORIDA 33125

TELEPHONE: (305) 325-9818
FAX: (305) 325-8759
MCLAWYER@BELLSOUTH.NET

October 31, 2008

Hon. Joseph Farina
Chief Circuit Court Judge
73 West Flagler Street
Miami, FL 33130

Re: Public Records Request

Dear Judge Farina,

I hereby respectfully request a copy of any and all emails, memos, letters, documents or other media that is held by the judges, court administrators and employees under your control discussing FDLE Inspector Sandra Veiga and her termination in October 2008. (Please note that some spell it Viega).

I think there was a meeting with Judge Slom and other judges recently that discussed these issues. If so, I would like to see and inspect any and all memos, emails, letters and documents about that. I will send Judge Slom a copy of this letter as he may have access to the documents and make it easy to comply.

This is all requested pursuant to Chapter 119, the Florida Public Records Laws.

Very truly yours,



Michael A. Catalano

MAC:cm
Cc: Judge Samuel Slom

Michael A Catalano

From: Michael A Catalano [mclawyer@bellsouth.net]
Sent: Wednesday, October 15, 2008 4:17 PM
To: Trese, Patrick; Reinhard, Jennifer
Subject: Public Record's Request

Pat Trese and Jennifer Reinhard, Assistant State Attorneys
County Court

From Mike Catalano
1531 NW 13 Court
Miami, FL 33125
305-325-9818

Re: Sandra Viega, FDLE Inspector

Sent 10/15/08

I have the memo from Laura Barfield dated 7/29/08 to Sgt. John Harris and I have the memo terminating Viega dated 10/7/08.

I heard a rumor there is a new FDLE memo or discovery document listing a new address for Sandra Viega? If so, can you please fax or scan and send it to me?

My Fax: 305-325-8759

I also hereby make a public records request, pursuant to Chapter 119, Florida Statutes to the Miami-Dade SAO for a copy of any and all emails, letters, memos or any documents you have that show any member or employee of your office discussing anything about the Sandra Viega investigation with anyone other than me.

I will send a copy of this memo to the Public Records Department too.

This is rather simple. You either refuse to comply claiming an ongoing criminal investigation or you turn it over. If you don't reply by this Friday, I can file suit, seek attorney's fees and ask a Circuit Court Judge to compel this information being turned over.

Cc: Miami SAO Public Record's Dept.
Fax to: 305-547-0313 Attn: Lorna Solomon

LAW OFFICES
MICHAEL A. CATALANO, P.A.
ATTORNEY AT LAW

1531 N.W. 13TH COURT
MIAMI, FLORIDA 33125

TELEPHONE: (305) 325-9818
FAX: (305) 325-8759
MCLAWYER@BELLSOUTH.NET

Lee Cohen, Assistant State Attorney
Chief, County Court

Public Records Department
Broward SAO

From Mike Catalano
1531 NW 13 Court
Miami, FL 33125
305-325-9818



Re: Sandra Viega, FDLE Inspector

Hand Delivered: 10/29/08

I have the memo from Laura Barfield dated 7/29/08 to Sgt. John Harris of the Miami-Dade Police Department and I have the memo terminating Viega dated 10/7/08.

I heard a rumor there is a new FDLE memo or discovery document listing a new address for Sandra Viega? If so, can you please fax or scan and send it to me?

My Fax: 305-325-8759 My email is: mclawyer@bellsouth.net

I also hereby make a public records request, pursuant to Chapter 119, Florida Statutes to the Broward SAO for a copy of any and all emails, letters, memos or any documents you have that show any member or employee of your office discussing anything about the Sandra Viega investigation with anyone.

I want to see all documents that discuss what she did that got her terminated and how your office was dealing with it.

I will send a copy of this memo to the Public Records Department too.

This is rather simple. You either refuse to comply claiming an ongoing criminal investigation or you turn it over. If you don't reply by next Friday, I can file suit, seek attorney's fees and ask a Circuit Court Judge to compel this information being turned over.

RECEIVED
STATE ATTORNEY
2008 OCT 29 PM 3:30



Date: 11/17/08

To: Broward State Attorney's Office
Lee Cohen, ASA Chief County Court
Fax: 954-831-6198

From: Michael A. Catalano, P.A.
1531 N.W. 13 Court
Miami, FL 33125
Phone: 305-325-9818
Our Fax: 305-325-8759
Email: mclawyer@bellsouth.net

Pages: 2 (including this cover sheet)

Lee, I made the attached public records request and have heard nothing from your office. I also gave a copy to your public records coordinator.

I am filing suit and seeking attorney's fees and costs if I do not hear from someone at the SAO this Wednesday 11/19/08 by 5:00 pm. My hourly rate is \$450.00.

When I made the same request to the Miami SAO, they responded in three days. Governor Crist made it clear upon becoming our Governor that the public records laws are not to be ignored by any agency of the State.

The last time I made a public record's request of your SAO, it took over a month before someone sent me a note telling me that they thought your office did not have to comply.

Cc: Governor Crist's office of public records