

IN AND FOR SAINT LUCIE COUNTY, FLORIDA

James T. Wills
Plaintiff,

vs.

CASE NO.: 562024CA001398AXXXHC

Judge Brett M. Waronicki

Keith Pearson,
Sheriff of Saint Lucie County, Saint Lucie
County Sheriff's Office,
Defendants.

_____ /

COMPLAINT

1. Plaintiff, files this Complaint against Defendant, and alleges as follows:

JURISDICTION

2. This is an action for damages of more than \$50,000, exclusive of fees and costs.
3. Plaintiff, resides in, and all material events occurred in St. Lucie County, Florida, and are related to his employment with the Saint Lucie County Sheriff's Office.
4. Defendant, Keith Pearson, is now the Sheriff of Saint Lucie County and resides in Saint Lucie County, Florida.
5. This action is brought pursuant to Florida Statute, Section 112.3187 (the Public Whistle-blower's Act).

MATERIAL FACTS

6. Plaintiff's desire was to retire at the same time as his wife (also a Saint Lucie County Sheriff's Office employee) after she vests with thirty years employment in approximately September of 2026.
7. On October 13, 2022, Plaintiff sent a transfer request memo to Captain Adam Goodner, and later that day met with Major Mike Sheelar to discuss Plaintiff's request for transfer and while Plaintiff was speaking with Sheelar, Chief Deputy Brian Hester came into Sheelar's office.

8. Major Sheelar stated there were other transfers scheduled for January 1, 2023, and suggested Plaintiff's transfer occur on that same date and Plaintiff should consider the upcoming holiday season and missing important family time if working another schedule.
9. Lieutenant Scott Wells was called into Chief Brian Hester's office sometime after October 15th, 2022, and asked if he would be willing to become Commander of the SIU at some time in January 2023.
10. The agreement as to Plaintiff's transfer date being January 1st, 2023, was finalized on October 14th, 2022, at 8:08am as documented in a text message from Plaintiff to Major Mike Sheelar, including Sheelar's response. See Exhibit A.
11. Later that same day, Plaintiff was called by Detectives Bolonka and Osteen at approximately 6:00pm and advised that unlawful camera/recording devices had been placed in the Plaintiff's personal office and were removed earlier that day.
12. Detective Osteen had observed Detective's Angulo and Singley being involved in removing two cameras from the ceiling of Plaintiff's personal office, with wiring being pulled through the ceiling. See Exhibit B.
13. There is evidence to believe that the recording devices placed in Plaintiff's Office were to intercept conversations of employees Plaintiff spoke with privately, that had relevant information as to Sheriff Ken J. Mascara's actions in a Florida Department of Law Enforcement investigation into alleged "ghost candidate" campaign finance reporting violations by the Sheriff. See Executive Summary of the FDLE investigation, attached as Exhibit C.
14. The former Sheriff, Ken Mascara had a close and personal relationship with the present Sheriff, Keith Pearson.
15. At all times relevant to this complaint, Keith Pearson was acknowledged to be the most knowledgeable person as to covert surveillance techniques with the SLCSO.
16. Keith Pearson was the Lieutenant/Commander of the SIU unit immediately prior to Plaintiff.
17. Singley and Angulo were the most knowledgeable persons in the SIU as to covert surveillance.

18. Two of the witnesses named in the FDLE investigative report and known to the Sheriff to have relevant information for FDLE, would regularly see the Plaintiff in his private office and speak to Plaintiff behind closed doors.
19. On October 14th, 2022 upon discerning that his office had been illegally “bugged”, Plaintiff reported the same to his direct supervisor Captain Adam Goodner.
20. Plaintiff also met with State Attorney’s Office Chief Investigator Nora Pfeiffer, and spoke with the head of the Saint Lucie County SAO, David Dodd.
21. Later that same day, Plaintiff met with Lt. James DeFonzo of the SLCSO Internal Affairs Division and provided DeFonzo the two recording devices and the drill that had been used in their removal.
22. While Plaintiff met with DeFonzo, DeFonzo called Chief Hester on a speaker phone, who said the Martin County Sheriff’s Office would be requested to conduct the investigation because he wanted the investigation to be transparent. Chief Hester also said that he would be playing golf with the Sheriff the next morning and would wait to tell him then.
23. The Sheriff, however, apparently did not want an outside agency to conduct the investigation, and the ensuing criminal investigation and internal investigation were not complete nor were they handled in a professional and unbiased manner.
24. On October 15th 2022, in a meeting with Chief Hester, Adam Goodner, and Mike Sheelar, Plaintiff requested to notify the affected outside agencies and was told by Chief Brian Hester not to notify them until being directed to do so.
25. On October 28, 2022, Plaintiff met with Major Mike Sheelar in his personal office on an unrelated matter, and Sheelar stated the suspects of the wiretap investigation Singley and Angulo, were looking at two days off for their actions. This occurred prior to the criminal case being fully investigated and prior to any Internal Affairs investigation.
26. On October 31, 2022, at 4:32 AM, Plaintiff sent an email to the Sheriff and then legal counsel Adam Fetterman, notifying them that he was going to officially notify affected outside agencies (Federal and local) of the illegal wiretap investigation, and

inform those agency's affected personnel that they were potentially recorded without their knowledge. In this email Plaintiff specifically requested he be afforded "Whistle-blower protection". See Exhibit D.

27. On October 31, 2022, at 6:16 AM, Sheriff Ken Mascara forwarded the Plaintiff's email to Chief Bryan Hester and Major Mike Sheelar with the words "Here you go".
28. Plaintiff was called on his cell phone at approximately 7:30 AM by Major Mike Sheelar, who stated he was with Captain Troy Norman. Plaintiff was told he was immediately being transferred to a Road Patrol position and to turn in his keys to SIU and to clean out his office.
29. It is routine practice that Commanders with SLCSO spend multiple days sharing information and planning for the transfer to facilitate a smooth transition of duties between them.
30. This transition did not occur, there was not a face-to-face meeting between the Lieutenants involved, nor a notification of transfer.
31. The Plaintiff's immediate removal from his position as the Special Investigations Commander was within a short period of suspects Singley and Angulo being abruptly transferred to Road Patrol.
32. On the morning of October 14, 2022, Plaintiff told his co-workers of his scheduled departure being January 1st 2023, to set the groundwork for a smooth transition in the upcoming months.
33. When Plaintiff was abruptly transferred there were at least three weeks where Executive Command Staff (other than his immediate supervisor) would avoid contact with Plaintiff, apparently for fear of retaliation from the former Sheriff.
34. The criminal wiretap investigation was never submitted to the State Attorney's Office for review at any time.
35. In early May the Plaintiff received a copy of the internal affairs report which revealed that Detective Singley had received two days without pay for his involvement in placing the recording devices in Plaintiff's Office and Detective Angulo was exonerated, although during his interview he admitted that he knew he

should not have been complicit in placing the recording devices in Plaintiff's office.

36. Major Sheelar had been directed by Sheriff Mascara as to the intended discipline for Detectives Singley and Angulo as evidenced by Major Sheelar's disclosure to the Plaintiff on October 28th 2022.
37. These factors suggest that the investigations, both criminal and internal, were compromised.
38. Deputy Angulo had a one-on-one interview with Sheriff Mascara in April or May of 2023, and was thereafter moved to a K-9 position, with significant monetary benefit.
39. Angulo's advancement was over other deputies who had meaningful training and K-9 experience.
40. In May of 2023 Sheriff Mascara had one-on-one meetings with Deputy Angulo, Deputy Bolonka, Deputy Ridle and Detective Osteen, During these meetings Sheriff Mascara indicated that he was displeased with the Plaintiff for reporting the criminal wiretap investigation.
41. Plaintiff reasonably believed that he would be targeted by Sheriff Mascara for demotion.
42. During this time, Plaintiff supervised several deputies with less than two years' experience and felt that there was a high chance for officer mistakes that would be exaggerated to disparage the leadership abilities of the Plaintiff.
43. Plaintiff felt his subordinates would be increasingly scrutinized, which could result in the possibility of unjust discipline of his subordinates, to achieve the demotion or termination of the plaintiff.
44. Due to the significant stress added by the accumulation of events detailed above, including the compromised criminal and internal investigations, when Plaintiff learned of the troubling accusatory interviews conducted by Sheriff Mascara, Plaintiff experienced a notable increase in the symptoms of a troubling ailment.
45. Plaintiff's decision to retire prior to September of 2026 were based on the factors set out in paragraphs 32 to 43 above.

46. On the morning of May 16th, 2023, Plaintiff called Sheriff Mascara on his cell phone. Plaintiff advised the Sheriff that he was going to retire and asked him if he could use over 720 hours of sick leave.
47. Sheriff Mascara told Plaintiff that he would speak with Major Sheelar and see what had been done in the past.
48. When the Plaintiff asked Major Sheelar if he had spoken to the Sheriff about the Plaintiff using his sick leave, he stated “No that we don’t do that”.
49. Plaintiff provided two examples, being Major Doug Hardie and Detective Mike Moller, which Major Sheelar denied any knowledge of.
50. The SLCSO has routinely permitted this practice for Chief Deputies, Majors, Captains, Lieutenants, Detectives and Deputies.
51. On May 17th, 2023, after being denied permission to use earned sick leave as was routine practice for prior employees, Plaintiff filed separation/retirement paperwork.
52. Section 112.3187(4), states: ACTIONS PROHIBITED. —
- (a) *An agency or independent contractor shall not dismiss, discipline, or take any other adverse personnel action against an employee for disclosing information pursuant to the provisions of this section.*
- (b) *An agency or independent contractor shall not take any adverse action that affects the rights or interests of a person in retaliation for the person’s disclosure of information under this section.*

THE RETALIATORY ACTIONS

53. Approximately three hours after sending the email stating that he was going to inform other agencies of the situation, Plaintiff was informed that he would be transferred to a road patrol supervisory position.
54. Plaintiff’s role as the Commander of the Special Investigations Unit consisted of a work week from Monday through Friday, 8am to 4pm with weekends and holidays off. The Plaintiff was also paid an additional clothing allowance during this period.

55. Upon being transferred, the Plaintiff worked weekends and some holidays, thereby limiting valued time with his family.
56. The routine practice of the Sheriff's Office was that retirees at Plaintiff's level were permitted to utilize their excess sick pay (over 720 hours) and vacation pay (over 240) before retiring. Plaintiff will prove this practice through Defendant's records and testimony from Chief Deputies, Majors, Captains, Lieutenants, Detectives and Deputies, pursuant to FS § 90.406 - Routine Practice.
57. As further evidence of adverse actions affecting Plaintiff, his ability to seek further employment as a professional law enforcement officer has been impeded. Prior to Plaintiff's separation from Defendant, the Personal Action Form was prepared, it states in pertinent part: "recommended for rehire, No".
58. When a Law Enforcement Agency indicates it would not rehire the person, it is axiomatic that another Law Enforcement Agency considering hiring Plaintiff, would be doubtful about doing so.
59. Most Law enforcement agencies would routinely disqualify a candidate for a sworn law enforcement position with a "no rehire" proviso in their record.
60. Plaintiff received compensation through the Florida Retirement System to maintain his general financial responsibilities. The Florida Retirement System does not allow employment within the FRS for a period of 365 days without substantial fines and repayment.
61. Despite the FRS limitation, Plaintiff feels that the stain on his future professional endeavors by SLCSO's retaliatory "no rehire" notation may impair his future professional endeavors in law enforcement.
62. The "no rehire" branding is a public record per F.S. Chapter 119.
63. During Plaintiff's 20 years in supervisory positions with the Saint Lucie County Sheriff's Office, he was never subject to a formal disciplinary action, other than being involved in two motor vehicle crashes.

COUNT I

64. Plaintiff is entitled to Whistle-Blower protection pursuant to Florida Statutes, Section 112.3187(5), as an employee who has disclosed information relevant to a violation or suspected violation of any federal, state, or local law, rule, or regulation committed by an employee or agent of an agency or independent contractor which creates and presents a substantial and specific danger to the public's welfare.
65. Florida Statutes, 934.01(4) states: "To safeguard the privacy of innocent persons, the interception of wire or oral communications when none of the parties to the communication has consented to the interception should be allowed only when authorized by a court of competent jurisdiction and should remain under the control and supervision of the authorizing court. Interception of wire and oral communications should further be limited to certain major types of offenses and specific categories of crime with assurance that the interception is justified, and that the information obtained thereby will not be misused."
66. Florida Statute § 934.03 Interception and disclosure of wire, oral, or electronic communications prohibited. — (1) Except as otherwise specifically provided in this chapter, any person who:
- (a) Intentionally intercepts, endeavors to intercept, or procures any other person to intercept or endeavor to intercept any wire, oral, or electronic communication;
 - (b) Intentionally uses, endeavors to use, or procures any other person to use or endeavor to use any electronic, mechanical, or other device to intercept any oral communication when:
 - 1. Such device is affixed to, or otherwise transmits a signal through, a wire, cable, or other like connection used in wire communication; or
 - 2. Such device transmits communications by radio or interferes with the transmission of such communication;
 - (c) Intentionally discloses, or endeavors to disclose, to any other person the contents of any wire, oral, or electronic communication, knowing or having reason to know that the information was obtained through the interception of a wire, oral, or electronic communication in violation of this subsection;
 - (d) Intentionally uses, or endeavors to use, the contents of any wire, oral, or electronic communication, knowing or having reason to know that the information was obtained through the interception of a wire, oral, or electronic communication in

violation of this subsection; or

(e) Intentionally discloses, or endeavors to disclose, to any other person the contents of any wire, oral, or electronic communication intercepted by means authorized by subparagraph (2)(a)2., paragraph (2)(b), paragraph (2)(c), s. 934.07, or s. 934.09 when that person knows or has reason to know that the information was obtained through the interception of such a communication in connection with a criminal investigation, has obtained or received the information in connection with a criminal investigation, and intends to improperly obstruct, impede, or interfere with a duly authorized criminal investigation.

67. Violation of F.S. § 934.03 is a third-degree felony.

68. Plaintiff suffered immediate damages in that he was transferred approximately three hours after disclosing that he would advise affected agencies of the criminal wiretap investigation.

69. Plaintiff, thereby lost the advantages of an 8 o'clock AM – 4 o'clock PM workweek, with all holiday's off, for a period of two-months, as it was agreed that Plaintiff would remain in SIU until January 1st, 2023.

70. Plaintiff was retaliated against by the “no rehire statement” upon his separation from the agency.

71. Plaintiff was further retaliated against by denying him the routine practice of granting employees use of sick leave over 720 hours.

72. But for Plaintiff's disclosure of the illegal wiretap to affected agencies: he would not have been retaliated against by being transferred approximately three hours after advising of the disclosure.

73. Plaintiff was retaliated against by the loss of an 8AM to 4PM, Monday thru Friday work week, monthly clothing allowance, unmarked rental vehicle with weekends and Holidays off.

74. Instead, he was changed to a 7AM to 7PM schedule working every other weekend.

75. Plaintiff's son was a senior at John Carroll High School and because of his new assignment and schedule, Plaintiff's ability to attend his son's sporting and school

events was greatly restricted.

76. But for the circumstances set forth in paragraphs 32. to 43., Plaintiff would have continued with his career at the Saint Lucie County Sheriff's Office until September of 2026 when he would have retired with his wife as they had planned.

77. The loss of Plaintiff's income and benefits for approximately 28 months is \$300,000.00.

WHEREFORE, Plaintiff demands a trial by jury, compensation for damages, attorney's fees, costs, interest, and all further relief this court deems just and proper.

E. Clayton Yates, P.A.
FEE, YATES & FEE, PLLC
426 Avenue A
Ft. Pierce, FL 34950
Phone: 772-465-7990
Facsimile: 772-465-1886
Primary Email: cyates@feeyateslaw.com
Secondary Email: eservice@yateslawfla.com

By: _____

E. Clayton Yates
Florida Bar No.: 398720

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy has been furnished via the Court's e-portal to: Liana De La Noval, ldelanoval@anblaw.com and asalgado@anblaw.com this 30th day of July 2024.

By: _____

E. Clayton Yates
Florida Bar No.: 398720

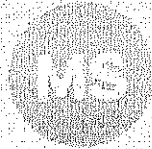
EXHIBIT

A

9:14

LTE

Phone



Michael

You working today?

Yes at my office

Are you able to come see me at the main office

I have a 4 o'clock with an employee it'll take about 20 minutes

I can come know. If that's ok.

Great just doing my mental



Messages



I

The

I'm

Q

W

E

R

T

Y

U

I

O

P

9:15

Phone

100% 5G



Michael



I can come know if that's ok

Great just doing my mental health training

K be there in 15

OK

Fri, Oct 24 at 8:08 AM

Jan 1st is good thanks

Got it



I

The

I'm

Q

W

E

R

T

Y

U

I

O

P

9:15

Phone

LTE



Michael

Want to add the contact's name?

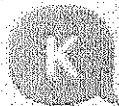
Jan 1st is good thanks

Got it

Fri, Oct 14 at 10:58 PM

Done

Thanks. We'll talk to you tomorrow



Delivered



I

The

I'm

Q W E R T Y U I O P

EXHIBIT

B

INCIDENT/INVESTIGATION REPORT

INCIDENT DATA

Agency Name
St. Lucie County Sheriff's Office

Case#
22-11671

ORI
FL 0560000

Date / Time Reported
10/15/2022 15:25 Sat

Location of Incident
[REDACTED]

Gang Relat
NO

Premise Type
Government / Public -

Zone/Pack
Z08

Last Known Secure
10/14/2022 10:00 Fri

At Found
10/15/2022 15:25 Sat

Crime Incident(s)	(Com)	Weapon / Tools	Activity
#1 <i>Stalking / Harassment</i>		<i>NOT APPLICABLE</i>	
#2 Crime Incident			
#3 Crime Incident			

MO

VICTIM

of Victims *1* Type: *INDIVIDUAL/NOT LAW* Injury: *None* Domestic: *N*

Victim/Business Name (Last, First, Middle)
[REDACTED]

Victim of Crime # *1* DOB [REDACTED] Race *W* Sex *M* Relationship To Offender *OT* Resident Status [REDACTED] Military Branch/Status [REDACTED]

Age *52*

Home Address [REDACTED] Email [REDACTED] Home Phone [REDACTED]

Employer Name/Address
ST LUCIE COUNTY SHERIFFS DEPT 4700 MIDWAY RD W Business Phone [REDACTED] Mobile Phone [REDACTED]

VYR Make Model Style Color Lic/Lis VIN

OTHERS INVOLVED

CODES: V- Victim (Denote V2, V3) WI = Witness IO = Involved Other RP = Reporting Person (if other than victim)

Type: Injury:

Code Name (Last, First, Middle) Victim of Crime # DOB Race Sex Relationship To Offender Resident Status Military Branch/Status

Age Email Home Address Home Phone

Employer Name/Address Business Phone Mobile Phone

Type: Injury:

Code Name (Last, First, Middle) Victim of Crime # DOB Race Sex Relationship To Offender Resident Status Military Branch/Status

Age Email Home Address Home Phone

Employer Name/Address Business Phone Mobile Phone

PROPERTY

L = Lost S = Stolen R = Recovered D = Damaged Z = Seized B = Burned C = Counterfeit / Forged F = Found
(*OI* = Recovered for Other Jurisdiction)

VI #	Code	Status From/To	Value	OJ	QTY	Property Description	Make/Model	Serial Number

Officer/ID# *Shireman, Mark A* [REDACTED]

Invest ID# *Shireman, Mark A* [REDACTED] Supervisor *Sessams, Perry S* [REDACTED]

Status Complainant Signature Case Status *Inactive* Date *11/22/2022* Case Disposition: Page 1

Incident Report Additional Name List

OCA: 22-11671

St. Lucie County Sheriff's Office

Additional Name List

Name Code/#	Name (Last, First, Middle)	Victim of Crime #	DOB	Age	Race	Sex
1) WI 5	OSTEEN, JONATHAN ZACHARY		[REDACTED]			W M
	Address [REDACTED]					
	Emp/Addr <i>Saint Lucie Sheriff Office, 4700 W Midway Road</i>					Mobile #: - -
2) WI 1	BOLONKA, ANDREW					W M
	Address [REDACTED]					
	Emp/Addr <i>St Lucie Sheriffs Office</i>					B: - - Mobile #: - -
3) WI 2	MONDRAGON, LIONEL					W M
	Address [REDACTED]					
	Emp/Addr					H: - - E: - - Mobile #: - -
4) WI 7	LOUPE, BRADY					W M
	Address [REDACTED]					
	Emp/Addr <i>Saint Lucie County Sheriffs Of, 4700 W Midway Rd</i>					B: - - Mobile #: - -
5) WI 9	BRADY, JOHN					W M
	Address <i>4700 W MIDWAY RD , FORT PIERCE, FL 34981-</i>					
	Emp/Addr					H: - - E: - - Mobile #: - -
6) WI 10	MARTINEZ, SANTIAGO TEODOMIRO J					W M
	Address <i>4700 W MIDWAY RD , FORT PIERCE, FL 34981-</i>					
	Emp/Addr					Mobile #: - -
7) WI 3	LOPEZ, JOHN					W M
	Address <i>4700 W MIDWAY RD , FORT PIERCE, FL</i>					
	Emp/Addr <i>Sisco</i>					B: - - Mobile #: - -
8) WI 4	RIDLE, EVAN WILLIAM					W M
	Address <i>4700 W MIDWAY RD , FORT PIERCE, FL 34981-</i>					
	Emp/Addr <i>St Lucie County Sheriffs Offie</i>					Mobile #: - -
9) WI 6	EVANS, NATE					W M
	Address <i>4700 W MIDWAY RD , FORT PIERCE, FL 34981-</i>					
	Emp/Addr					B: - - Mobile #: - -

Incident Report Additional Name List

OCA: 22-11671

St. Lucie County Sheriff's Office

Additional Name List

Name Code/#	Name (Last, First, Middle)	Victim of Crime #	DOB	Age	Race	Sex
10) WI 8	SALIBA, BRYAN					W M
	Address 4700 W MIDWAY RD, FORT PIERCE, FL 34981-					
	Empl/Addr					
						B: - -
						Mobile #: - -

INCIDENT/INVESTIGATION REPORT

St. Lucie County Sheriff's Office

Case # 22-11671

Status Codes L=Lost S=Stolen R=Recovered D=Damaged Z=Seized B=Burned C=Counterfeit/Forged F=Found

	UCR	Status	Quantity	Type Measure	Suspected Type	Up to 3 types of activity
D R U G S						

Assisting Officers

Suspect Hate / Bias Motivated: *Unknown (Offender's motivation not known)*

NARRATIVE

REPORTING OFFICER NARRATIVE

St. Lucie County Sheriff's Office

OCR 22-11671
Date / Time Reported Sat 10/15/2022 15:25

Victim
WILLS, JAMIE

Offense
STALKING / HARASSMENT

On Saturday, October 15th, 2022, I was called by Sergeant M. Briglia and requested to respond to the Sheriff's Office in reference to an investigation. I was advised I would be notified of the nature of the investigation upon my arrival, and advised to be there at 0930 hours.

Upon my arrival, I noted the presence of the entire S.I.U. Investigative Unit. I also noted Detective A. Scuoppo was present. Detective Scuoppo and I met with Sergeant Briglia, and Captain A. Goodner.

Synopsis:

On Friday, October 14th, 2022, Detective Andrew Bolonka was called by Detective Jonathan O'Steen. O'Steen had witnessed a fellow Detective, Christopher Singley, removing covert cameras from inside the office of Lieutenant J. Wills. When Detective O'Steen confronted Detective Christopher Singley and Detective Angulo about the incident, they said it was a joke because they knew the Lieutenant had a concern of being recorded. Detective O'Steen thought about the incident and felt this to be an integrity issue and Lt. Wills may have been recorded in confidential conversations within his office. Detective O'Steen said his concerns were shared by fellow Deputy, Evan Ridle. Detective Bolonka made contact with Lt. Wills. Detective O'Steen, Detective Bolonka, and Lt. Wills all meet at a location off Angle Road. The facts were disclosed during this meeting of what Detective O'Steen witnessed. They all returned to the S.I.U. Office to investigate further and located in Detective Christopher Singley's desk the drill he was using, a [REDACTED] type covert surveillance camera, and a [REDACTED] style covert camera. These items were photographed and contact was made with Captain Goodner. All S.I.U. Detectives and Supervisors were instructed to be at St. Lucie County Sheriff's Office this morning at 0930 hours.

The following are the results of all interviews conducted by Detective Scuoppo and myself:

At approximately 0945 hours, all S.I.U. Detectives were advised we were conducting a criminal investigation. Based upon the nature of the investigation, these interviews would all be recorded and conducted separately. All S.I.U. Detectives and Supervisor were seated in briefing room #1, they were continuously recorded as they waited to be interviewed, and all were notified they were going to be advised of their Miranda rights prior to interview.

Detective Andrew Bolonka

At approximately 1148 hours, we interviewed Detective Andrew Bolonka. Detective Bolonka was asked if he was aware of the investigation. He noted the investigation was over Unlawful Interception of Communication of Others under F.S.S. 934.02. Detective Bolonka said Detective O'Steen notified him that he, Detective O'Steen, witnessed Detective Christopher Singley and Detective Jose Angulo removing cameras from Lt. J. Wills' office. He felt it was odd because Lt. Wills had come in and advised the members of S.I.U., on his day off, of his moving from the division so they would not hear rumors or have speculation. Lt. Wills left, and that afternoon, the cameras were removed. Earlier in the day, after being notified, Detective Christopher Singley allegedly went upstairs and obtained a screw gun. The screw gun was on his desk. When Detective Christopher Singley heard Lt. Wills was returning to drop something off for Deputy Ridle, he put the screw gun in his desk drawer. When Detectives O'Steen, Ridle, and others came back from lunch, they found Detective Christopher Singley removing cameras from Lt. Wills' office. Detective Christopher Singley told other Detectives the cameras were a joke, and it was a prank on the Lieutenant. Detective Bolonka then realized from being in the Lieutenants office he previously had noted the [REDACTED]. He noticed it was not of a variety used in commercial buildings. Detective Bolonka also acknowledged he had used this type of covert camera in previous criminal investigations. He said there had always been rumors the S.I.U. office

REPORTING OFFICER NARRATIVE

St. Lucie County Sheriff's Office

		OCA 22-11671
Victim WILLS, JAMIE	Offense STALKING / HARASSMENT	Date / Time Reported Sat 10/15/2022 15:25

was recorded or "wired up." A couple of weeks prior, Detective Christopher Singley had put a camera on the Lieutenant's bookshelf in an obvious place. The Lieutenant noticed the camera, and asked why it was there. Reportedly, Detective Christopher Singley said it was a "joke." Detective O'Steen questioned Christopher Singley as to where these cameras were recording. He was told they went to the [REDACTED] a program and application utilized by S.I.U. for covert recording. Detective Christopher Singley added it went to a private server within the [REDACTED] that only administrators had access to. Those persons were Detective Christopher Singley, Detective Angulo, and "the Captain." The term "Captain" was used, but no name was attached. These recorded videos were not visible with standard use of the application. When the cameras were being removed by Christopher Singley, O'Steen told Bolonka he could see wires come down, and then being shoved back up into the ceiling. Christopher Singley first removed the [REDACTED] style camera, and then the [REDACTED] type camera. When the [REDACTED] style camera was removed, the RCA style wires were left hanging from the wall. Based upon the current dynamics within the agency, presently there have been several movements of longtime staff to other positions within the agency; Detective Bolonka felt these cameras were probably not a joke, but an effort to record the conversations within the Lieutenant's office without the Lieutenant's knowledge or authorization. Furthermore, Lieutenant Wills had verbally counselled Detective Christopher Singley about the camera he found on his bookshelf. When this camera was noted, Lt. Wills made sure to let Detective Christopher Singley know this was unacceptable. Detective Bolonka feels this was nefarious and illegal actions on the part of Detectives Christopher Singley and Angulo. Detective O'Steen confided in Detective Bolonka because he knew of Detective Bolonka's views and level of integrity. Detective Bolonka then advised this was a violation of F.S.S. 934.02 as conveyed to him by Detective O'Steen and he had a duty to report it. There was another comment made on Friday that caused concern from O'Steen that he conveyed to Bolonka. Christopher Singley said in a group of Detectives that if they thought the cameras were weird to imagine what it was like to sneak out at night and put a tracker on your boss's vehicle.

According to Detective Bolonka, O'Steen did not want to be labeled a "snitch." Detective Bolonka explained in Law Enforcement, there was a duty to report any and all criminal activity and act upon it, a duty to report. Detective O'Steen told Detective Bolonka that Deputy Ridle would probably call Detective Bolonka as well because he was very stressed and concerned about the occurrence as well. Detective Bolonka set up a meeting on Angle Road with Lieutenant Wills, Detective O'Steen, and himself. Detective Bolonka identified the cameras and drill from images sent to me via Captain Goodner. He recommended that all persons having access to the [REDACTED] application have all their electronic devices seized and forensically evaluated and replicated in efforts of locating all evidence. He relinquished his Department Issued cellular telephone at this point with passcodes and usernames. I explained it was my intention to obtain all of those devices. The [REDACTED] application is listed under the application icon as [REDACTED].

Detective Scuoppo asked the time frame of the camera located on the shelf that Detective Christopher Singley referred to as a joke. Detective Bolonka deferred him to other Detectives who work in the unit all the time, as opposed to Detective Bolonka only being there part of the time.

Lt. Wills, Detective O'Steen, and Detective Bolonka then went to the S.I.U. Office. There was a hole in the ceiling where Detective Bolonka had previously seen the [REDACTED] camera. Wires were still hanging from where the [REDACTED] camera had been. Detective Bolonka did not go into the attic, but was advised by Lt. Wills there were [REDACTED] wires lying severed in the attic. Drywall dust was also noted in areas of the removal, not obvious, but still present behind the couch, under a cushion, and on a small table adjacent the area. It gave the appearance as if someone hurriedly tried to clean up from the removal. Lt. Wills would no longer speak inside the S.I.U. Office. All parties went outside to speak. Detective Bolonka called Assistant State Attorney Nora Pfeiffer due

REPORTING OFFICER NARRATIVE

St. Lucie County Sheriff's Office

Victim WILLS, JAMIE	Offense STALKING / HARASSMENT	OCA 22-11671 Date / Time Reported Sat 10/15/2022 15:25
-------------------------------	---	---

to a long-term business relationship to discuss what had been discovered. ASA Pfeiffer advised that due to conflict with the Sheriff's Office, the States Attorney's Office could not comment on the findings.

In closing, Detective Bolonka questioned as to, why anyone would have removed the cameras the day Lt. Wills decided to resign his post as Commander of S.I.U. The Lieutenant went on his day off to notify his Detectives. Knowing of the Lieutenant's impending absence, the cameras were removed. Detective Christopher Singley was then surprised by the unexpected return of the Lieutenant to drop off items to another Detective, and endeavored to hide the screw gun. Detective Bolonka speculated that motivation for these actions and having what he believed to be [REDACTED] in the Lieutenant's office was both resultant and due to the significant recent changes in positioning of personnel throughout the agency.

Lieutenant Jamie Wills

At approximately 1202 hours, we interviewed Lieutenant Jamie Wills, Commander over the S.I.U. Unit. Lieutenant Wills said he was off yesterday and helping his son with a yard sale. Deputy Ridle asked Lt. Wills to purchase a television from the yard sale. Lt. Wills said he would not charge Deputy Ridle for the television because it was for his children. He brought the television to the S.I.U. Office between 1030 and 1100 hours and dropped it off. He saw Sergeant Serafini and wished him well since it was Sergeant Serafini's last day in the unit, Lt. Wills is transferring out of the unit as well. Afterwards he left to go to lunch.

After 1700 hours, Lt. Wills was contacted by Detective Bolonka who requested to meet. They agreed to meet at the boat ramp at Angle Road and Johnston Road. When he arrived, Lt. Wills met with Detective's Bolonka and O'Steen. O'Steen seemed very nervous. Detective O'Steen then told Lt. Wills that Detective Christopher Singley and Detective Jose Angulo told him it was a joke, but he saw them taking stuff off the walls of his office. O'Steen questioned them about what they were doing and they told him it was a joke they were pulling on Lieutenant Wills. Lt. Willis said Detective O'Steen told him that Detectives Christopher Singley and Angulo had cameras in the Lieutenants Office that they were removing.

Lieutenant Wills said approximately three weeks ago he went to his office and looked at his bookshelf where he keeps duck memorabilia because he is an avid duck hunter. He noticed a [REDACTED] camera. Knowing Detective Christopher Singley is very technologically oriented and handle much of the surveillance equipment for the unit, Lt. Wills called him in and asked Christopher Singley what it was. Detective Christopher Singley said it was a camera placed there as a joke, but Lt. Wills noted a red light on the camera. Detective Christopher Singley removed the storage card from the device and installed it in a reader, displaying to Lieutenant Wills there was nothing recorded by the device. Lt. Wills was angered by this and told Detective Christopher Singley directly, "don't do this shit again." Lt. Wills was very angry when he heard Detective's O'Steen's account after telling Detective Christopher Singley this three weeks prior. He was particularly angry because he had closed door meetings on Thursday, October 13th, 2022 at approximately 1300 hours with Commanders and Supervisors of neighboring agencies in reference to narcotics investigations, and confidential information about prior cases was potentially shared. Lt. Wills said all these were jeopardized by the fact that someone may have been covertly recording or viewing this and other meetings. The Lieutenant was very angered.

Lt. Wills did not have his company vehicle, nor his keys because he was off duty in his personal vehicle. He instructed Detective Jonathan O'Steen to accompany him to the S.I.U. Office to get him in and view the scene with Detective Bolonka. He viewed his office and it was apparent not only that the smoke [REDACTED] had

REPORTING OFFICER NARRATIVE

St. Lucie County Sheriff's Office

OCA
22-11671
Date / Time Reported
Sat 10/15/2022 15:25

Victim	Offense
WILLS, JAMIE	STALKING / HARASSMENT

been removed, but also it looked as if the area had been cleaned. The cleaning was not complete and drywall dust was located behind the couch, under the cushions, and on a table in the area. He was asked by Detective Scuoppo if it was common practice to joke around like this in the unit. Lt. Wills said jokes were limited to verbal and sometimes print, but never recording videos, at least not to his knowledge. Lt. Wills then requested Detective O'Steen accompany him in the attic based upon looking for other evidence. Insulation was disturbed, broken wires were located, and dust was disturbed in areas adjacent the duct work. Because of what was witnessed and the concern for other recording devices within the office, they all stepped outside to speak.

Detective Bolonka was requested to call Deputy Ridle. Contact was made and Ridle said that he asked everyone to wait a couple of minutes before taking Sergeant Serafini for his going away luncheon because Lt. Wills was dropping the television off for him, Ridle. When Detective Christopher Singley heard this, he immediately went and put the screw gun sitting on his desk in a drawer, and went and set at the desk adjacent the Sergeant's office, something that Ridle had never seen Christopher Singley do.

Lt. Wills said he feels this was an overt act and he feels someone put Detectives Christopher Singley and Angulo up to putting up covert cameras. By their actions, they have put everyone in the unit in danger. Lt. Wills said if it is found that they were listening or recording, Detectives Christopher Singley and Jose Angulo have jeopardized the integrity of the agency, and violated their oath of office. Deputy Ridle asked Sergeant Serafini if he thought the circumstances were odd, but he said Sergeant Serafini was there on his last day and seemed disinterested. Detectives O'Steen and Ridle did not feel as if the actions of Detectives Christopher Singley and Angulo were a joke. Lt. Wills contacted Captain Goodner last night as well as Lieutenant Defonso to report what had occurred, and start this investigation. When asked about the [redacted] application and program, Lt. Wills knew little about it. He said he was advised by outgoing Lieutenant Pearson that Detective Christopher Singley and Angulo handled these matters, electronics and surveillance.

The topic of the vehicles was then discussed in conjunction with the trackers. Lt. Wills said he felt the statement made by Detective Christopher Singley was equally troubling about having to go to your bosses house to install a tracker. There are possibly trackers missing, or unaccounted for, but it was unknown at this time if there were missing agency owned tracking devices. Lt. Wills said when he first went to the S.I.U. Unit the most recent time, they had a narcotics buy with a confidential informant. Upon completion and payment made to the C.I., they were about to leave when Detective Christopher Singley made a comment about placing a tracker on this C.I.'s car because he knew she would take the money given to her and go to another drug dealer to purchase narcotics. Detective Christopher Singley wanted to place this tracker to find whom the subjects other suppliers were. Lt. Wills interceded and asked if Detective Christopher Singley had a tracking order to, place the tracking device. When Detective Singley told Lt. Wills he had no court order, Lt. Wills advised him to never do that because everyone has right to due process of law. Lt. Wills felt this was an integrity issue then, but felt it was probably resultant of how Detective Christopher Singley was trained and by who. Lt. Wills has filed a formal complaint with the agency and wants there to be a full investigation criminally as well.

Sergeant Jeff Serafini

Sergeant Jeff Serafini said he was made aware this morning of a criminal complaint against S.I.U. When explained it was about cameras placed in Lt. Wills' office, Sergeant Serafini was also asked if he knew about them, and he said yes, but they were not active. He said Detective Christopher Singley put the cameras up as "more of a joke." This is because Lt. Wills does not like to be recorded and does not want cameras in the office. I asked Sergeant Serafini if

REPORTING OFFICER NARRATIVE

St. Lucie County Sheriff's Office

OCA 22-11671
Date / Time Reported Sat 10/15/2022 15:25

Victim
WILLS, JAMIE

Offense
STALKING / HARASSMENT

he knew the cameras were hot, or active. He said he did not. He was aware of [REDACTED] but was never on it as a supervisor. He also knew that Detective Christopher Singley was the administrator and did not know if "Keith", Lt. Keith Pearson, was still on the system. He said he knew the system had been in place since 2015 or 2016 when he worked in the division as a Detective. Detective Christopher Singley is senior in the unit, but has only been there approximately two and a half to three years. When asked how long the cameras had been up, Sergeant Serafini did not know, but correlated it to the week Lt. Wills had taken off work as to when they were installed approximately three weeks prior to now. He was aware of the camera in plain view on the bookshelf, and the [REDACTED] but did not know about the [REDACTED] camera. He said there had always been a [REDACTED] in the corner of the office. I questioned as to if anyone helped Detective Christopher Singley install the cameras to which he said he did not know. He did not see Detective Christopher Singley with the screw gun yesterday. He arrived at the office between 1030 hours and 1045 hours and left for his going away luncheon at 1115.

Detective Lionel Mondragon

Detective Mondragon was advised we were investigating cameras that had been installed in Lt. Wills' office. We asked him what he knew of them and what his involvement was. Detective Mondragon said he was completely unaware of any cameras in the Lieutenant's office until yesterday. While sitting at his desk, facing the wall and working, he overheard someone say there were cameras in the Lieutenants office. Another person said your joking right, to which someone else said no. Detective Mondragon said he had arrived there just before 1000 hours. He knew that Detective Christopher Singley, Sergeant Serafini, Detective Angulo, Detective Lopez, and Ridle were there when he arrived. He could not remember if it was Lopez or Ridle present. He did not remember seeing a drill, but did know they were talking about a lost one that intelligence had taken. He overheard parts of the conversations, but was focused on his work. He acknowledged that other employees played jokes on each other within the unit. He knew about [REDACTED] and had used it on cases in the past. He knew that Detective Christopher Singley was the administrator, but was unaware if Detective Angulo was or not. When asked about the [REDACTED] and [REDACTED] in the Lieutenants office, he said he did not know and that was never his focus if he was invited in, it was for business. He said he took notes of plaques for achievement and books on the shelf, but never took notice of these items. He also had little knowledge of the obvious camera that had been placed there three weeks prior. Let it be noted, no one had mentioned Detective Mondragon in any of the accounts or information provided to Detective Scuoppo or I during the investigation.

Detective Andrew Bolonka (Second interview at Detective Bolonka's request)

Detective Bolonka requested to speak with us a second time. He had left the interview and was headed home and reflecting on the interview and the crimes that occurred. He realized that the prior Lieutenant of S.I.U. was instrumental in bringing about, setting up, and being the administrator of the program and application, [REDACTED]. Detective Bolonka had expressed to Captain Goodner he felt it imperative to take possession of this Lieutenants electronics as well as part of the investigation as to not compromise collecting all electronics involved. I advised Detective Bolonka that Detective Scuoppo and I had already made a request to obtain these items and was currently awaiting an answer as to when and how to get them from agency administration.

Detective John Lopez

Detective Lopez was asked if he knew why he was there. He advised he had no clue. I explained it was about cameras in the Lieutenants office but Detective Lopez still did not know. He was questioned about the obvious

REPORTING OFFICER NARRATIVE

St. Lucie County Sheriff's Office

		OCA 22-11671
Victim WILLS, JAMIE	Offense STALKING / HARASSMENT	Date / Time Reported Sat 10/15/2022 15:25

camera placed in Lt. Wills' office approximately three weeks prior. He said he did not know about it, but had heard Lt. Wills freaking out about it, and that Christopher, Detective Christopher Singley, had placed it there. Detective Lopez got to the office early, around 0900 to 0930, but was called to court almost immediately. When he left the office, only Detective Singley had arrived there. He does not remember seeing a drill on Detective Christopher Singley's desk. He said he returned to the S.I.U. office around 1200. We asked if he had gone to the luncheon for Sergeant Serafini. He said he had not, after court, he went to lunch with Detective Bolonka. It was obvious Detective Lopez was not present at all during the incident on Friday. He was displayed the pictures of the [REDACTED] the [REDACTED] and the drill. He said he had not seen any of these items and the items in the Lieutenants office were never observed by him. Detective Lopez did say there had been rumors as long as he has been in S.I.U. that the office was bugged.

Deputy Evan Ridle

We spoke with Deputy Ridle who was aware of why we wished to speak with him, the cameras. Deputy Ridle explained he was sitting in the office yesterday when Christopher, Detective Christopher Singley, went upstairs, or somewhere to get a drill. Deputy Ridle said he mentioned that the Lieutenant was coming into bring him something. Detective Christopher Singley said he was glad Ridle told him, and then put the drill in his desk. Deputy Ridle thought this to be weird. Detective Christopher Singley then went on to say something about taking cameras out of the Lieutenants office. Deputy Ridle again thought this was joking around. Someone else in the office, unknown who, then asked how long cameras had been in there. Deputy Ridle did not hear the response, but did hear the only ones who had access were Detective Christopher Singley, Jose (Detective Jose Angulo), and the "Captain." Detective Christopher Singley did not elaborate on who the "Captain" was. Deputy Ridle was now thinking this is a bit far for a joke, but still thought it was a joke nonetheless.

Deputy Ridle then went outside to meet the Lieutenant and get the property he brought Ridle. Deputy Ridle came back inside and Detective Christopher Singley was taking things down inside the office, a [REDACTED] and a [REDACTED]. Deputy Ridle said the [REDACTED] had been there since Keith, Lt. Pearson, had it in there. When Lt. Pearson left the S.I.U. office, Deputy Ridle knew he took it down. That is how Ridle knew what it was. Where the camera had been, there were wires hanging down. Deputy Ridle did not think about it much, or "put energy into it as a joke" because he was leaving the unit. He then started thinking that if it was a joke, then why would Detective Christopher Singley have to do this, take cameras down, when the Lieutenant was not around.

Detective Christopher Singley removed the cameras and returned to his desk, still joking about the cameras. Detective Christopher Singley then made the statement that it was weird when you have to sneak into your boss's yard to put a tracker on his car. Recently the Lieutenant asked about missing trackers. Detective Christopher Singley had said he would have to come up with something about the missing tracker, a reason it was missing. Images were displayed to Deputy Ridle who confirmed these were the items, the [REDACTED] the [REDACTED] and the drill that he had seen in Detective Singley's possession.

Deputy Ridle and O'Steen rode to lunch together. As they spoke, the situation became more and more concerning. Deputy Ridle did not see Detective Christopher Singley actually removing the items, cameras, from the office, but Detective Jonathan O'Steen did. When they returned to the office, Deputy Ridle returned to the office, he asked Sergeant Serafini about the incident and Sergeant Serafini said it was just a joke. Deputy Ridle said he and other members of the unit joked around, using filters on pictures and poking fun, but never using video or cameras to his knowledge in the past. When asked about the incident with the dummy camera three weeks prior, he was not aware

St. Lucie County Sheriff's Office

Victim WILLS, JAMIE	Offense STALKING / HARASSMENT	Date / Time Reported Sat 10/15/2022 15:25
------------------------	----------------------------------	--

of its location by the Lieutenant, or what transpired between Lt. Wills and Detective Christopher Singley. When asked why he, Deputy Ridle, thinks Detective Christopher Singley did this, he said he had no idea, and he does not think anyone knows.

Shortly after the conclusion of the interview with Deputy Ridle, he contacted me on my department issued cellphone. Deputy Ridle explained after leaving the Sheriff's Office he had thought of additional information he wished to provide. Deputy Ridle referred to the covert surveillance cameras installed in the Lieutenants Office by Detective Christopher Singley, explaining he has never seen these types of covert surveillance cameras in the S.I.U. Office before.

Detective Jonathan O'Steen

We interviewed Detective O'Steen and he knew the investigation was over the curiosity involved surrounding the presence of cameras in the Lieutenants office. He explained around 1130 hours on Friday, he was sitting in the office with Detective Christopher Singley, Detective Jose Angulo, Sergeant Jeff Serafini and he thought Detective Lionel Mondragon was present as well. Detective Christopher Singley got up and said he did not think the Lieutenant was coming back. Detective Christopher Singley then went into the Lieutenants office with a drill and took down a couple of covert cameras. One of these cameras was in the Northeast corner, a [REDACTED] Images of the drill and the two surveillance cameras were presented to Detective O'Steen and he identified the items. It was pointed out and he did acknowledge that [REDACTED] do not usually have audiovisual cables connected to them. What sparked Detective O'Steen's curiosity was when the [REDACTED] was pulled down because it was hard wired in for power. When Detective O'Steen mentioned this, Detective Christopher Singley said it was a prank, a joke. He said the [REDACTED] was there to throw the Lieutenant off so he, the Lieutenant, could find that one. Detective O'Steen was sure it was hooked to power because Detective Christopher Singley had to yank it down, it was wired to power. O'Steen added you would only have power going to the device for one reason, and that was if "it was in use."

Detective O'Steen asked where it was going, recording, to Detective Christopher Singley. Detective Christopher Singley told him it was going to [REDACTED]. He then added it was in a private group in [REDACTED] that was accessible by only him (Christopher Singley), Detective Angulo, and the "Captain." Detective Christopher Singley did not identify who the "Captain" was. Detective O'Steen quit asking questions at that point.

Detective O'Steen thought the situation was funny. It was not until later in the day it started to cause more curiosity. He first called Deputy Evan Ridle and asked him if the situation made sense. Ridle said it did not if the camera was hard wired into a power service. He then called Detective John Lopez, and then Detective Andrew Bolonka. Detective O'Steen said that is when the whole thing, and then trailed off, on his thought.

Detective O'Steen was not around when the first camera, the bookshelf camera, was installed and discovered. He was out on Family Medical Leave Act (FMLA), and did not return until this past week. He acknowledged that joking around in this way, with cameras, was not a common practice. I asked him to speculate as to why he thought the cameras may have been installed and he said it could possibly be of a political nature, or someone did not like the way Lieutenant Wills is due to professional reasons, but he did not know for sure.

Detective Jose Angulo

Victim WILLS, JAMIE	Offense STALKING / HARASSMENT	Date / Time Reported Sat 10/15/2022 15:25
------------------------	----------------------------------	--

Detective Angulo was aware that the cameras were a joke played upon the Lieutenant. He said (WE) put up a fake camera in there and Christopher, Detective Christopher Singley, even told the Lieutenant about it. He said it was on the bookshelf, and Detective Christopher Singley also put up a fake [REDACTED] but it was not connected to anything. Detective Angulo said he was aware of the bookshelf camera and the [REDACTED], but not the [REDACTED]. He said he and Detective Christopher Singley perpetrated the joke because they knew the Lieutenant was always afraid of people recording in the office. He saw Detective Christopher Singley with the drill and the [REDACTED] but denied knowledge of the [REDACTED]. He said he knew the unit had one like this one. He also explained the [REDACTED] type camera was a direct video, unknown about audio, feed just like the one in the [REDACTED] room. Detective Angulo advised that Detective Christopher Singley and he were the administrators of [REDACTED]. He knew the system was started and running in 2018 when he joined the unit. When he joined the unit, Lt. Pearson, Lt. Pellegrini, and Sergeant Register had access and rights to the system. We asked about why the joke would continue with these cameras, after Detective Christopher Singley was counselled and yelled at by the Lieutenant. Detective Angulo could not explain why yesterday, the day the Lieutenant made the unit aware he was leaving, was the day Detective Christopher Singley chose to remove these cameras, without making the joke public knowledge to the Lieutenant. This was a question based upon the fact it was Detective Angulo and Detective Christopher Singley's joke admittedly. He could not say why that day was chosen. He was additionally asked as to why the cleanup if it was not a covert operation. His justification is Detective Christopher Singley did not want to get into trouble.

We explained to Detective Angulo it was apparent based upon all of his coworkers being disturbed by these actions and implicating he and Detective Christopher Singley that it appeared as if he had a degree of involvement. He said it was because he was the "camera guy" and the running joke about the Lieutenants concern over being recorded within the unit. He said that Detective Christopher Singley did these two things as a joke and neither of the cameras he knew about was connected to the [REDACTED] the one on the shelf was [REDACTED]. Detective Angulo said Detective Christopher Singley did not want to be caught by the Lieutenant taking the cameras down. Detective Scuoppo and I explained that was the very essence of what was wrong. He and Christopher Singley had knowledge of the joke, and Christopher Singley had been unconditionally advised not to do that again. Detective Christopher Singley did keep the cameras up and then did try to hide the fact they were taken down all making it look as if Detective Angulo and Detective Christopher Singley were complicit in a conspiracy.

Detective Angulo offered up all data storage and information advising he had not stored anything other than work related videos. I explained if the data storage of whatever type of device these, known cameras were connected to was cloud based, then there would not be any, because it could be deleted without trace. As we pressed harder about the tracking device, Detective Angulo again reverted to this being a joke, and the tracker comment was made just to illicit a response from Detective O'Steen. I closed the interview with the fact I knew Detective Angulo had been implicated by others in his unit. His account differed from their accounts of events. I advised him I felt he knew more than he was saying, but he continually denied and said it was just a joke.

Detective Christopher Singley

Detective Christopher Singley said two months ago Lieutenant Wills noticed a [REDACTED] in his office. Knowing that Detective Christopher Singley is very apt when it comes to electronics and surveillance, the Lieutenant asked Christopher Singley what it was. Christopher Singley explained what the item was and it was part of the alarm system. Detectives in the unit found this to be comical. About three weeks ago, while Lieutenant Wills was on vacation, Detective Christopher Singley entered his office and placed a camera on the bookshelf, one in the

R. REPORTING OFFICER NARRATIVE

St. Lucie County Sheriff's Office

OCA

22-11671

Victim

WILLS, JAMIE

Offense

STALKING / HARASSMENT

Date / Time Reported

Sat 10/15/2022 15:25

corner of the room that looks to be a [REDACTED] and a [REDACTED] style covert camera. He told me none of the cameras were functional, and they were all old items used a long time ago. He said neither linked to any recording device or power.

Detective Christopher Singley said he thought it would be funny to mess with the Lieutenant. He explained he had zip tied the [REDACTED] camera to the walls with cables not connected. He used drywall screws and put the [REDACTED] above the sofa.

Lieutenant Wills came back from vacation and noted the camera on his bookshelf, questioning Singley about the camera. Detective Christopher Singley advised the Lieutenant it was a joke. He pulled the sim card and displayed nothing had been recorded. Lieutenant Wills told Detective Christopher Singley how angry he was about the incident and told him never to do anything like that again, placing a camera in his office. He added he should call the Captain and make him aware of Detective Christopher Singley's actions, but he did not. At this point, Detective Singley made no mention of the other two cameras in the office. Detective Christopher Singley's answer as to why he did not tell Lt. Wills was "I just didn't" and "I really didn't think about it much." He continued to advise this was all a joke. He was additionally asked about the tracker comments he made referencing putting a tracker on his bosses car in the yard. He later said that was part of the joke as well, more directed at Detective O'Steen, based upon things in O'Steen's absence on Family Medical Leave Act. There were no trackers presently missing according to Detective Christopher Singley, and all had been accounted for. At this time it is unknown where the other trackers are.

Detective Christopher Singley said he had retrieved the impact driver from Detective Angulo's truck because Angulo had recovered the tool from the intelligence unit who had borrowed it. He brought the tool inside with the intention of taking down the cameras. He acknowledged that he put it away when Deputy Ridle made mention the Lieutenant was coming back into work to drop things off for Ridle. The Lieutenant was off, but had come to work this morning to advise members of the unit he was transferring out. He did not expect the Lieutenant's return, and did not hide the drill as we had been advised by other S.I.U. Detectives, but simply placed it inside his desk drawer.

We questioned on why Detective Christopher Singley chose this day to remove the cameras, after Lt. Wills had announced he was leaving, our belief was November 1st, but Christopher Singley corrected us stating January 1st. Detective Christopher Singley had no clear explanation. We pointed out that if he removed the cameras January 3rd, 2023, no one would know about him putting them up. By removing the cameras now, he ran the risk of being discovered by leaving holes and vacant spots where the cameras were previously. Detective Christopher Singley said he was not concerned because people knew this to be a joke. In his head, it was not a big deal. He also stated he waited until the Lieutenant left to remove them.

We pointed out Detective O'Steen had witnessed Detective Christopher Singley pulling on the [REDACTED] camera because after removing the screws, it was still connected by wires. Detective Christopher Singley glazed over his answer falling back to the fact that he, Detective Angulo, and Sergeant Serafini had knowledge of the joke. As I questioned further he seemed to switch over to the [REDACTED] camera and the fact the cables with the [REDACTED] ends were caught up and he had to pull on them. We confronted Detective Christopher Singley with the fact that several people overheard him say access to where these items were recorded was [REDACTED] That he, Detective Angulo, and the "Captain" were the only ones had access to a special area of the server, storage. In asking which "Captain" he was referring to, he again went back to more in the way of perpetuating the joke. He also said those cameras do not work with any system they actively have at S.I.U. He said, they are no cell, referring to cellular

St. Lucie County Sheriff's Office

Victim WILLS, JAMIE	Offense STALKING / HARASSMENT	Date / Time Reported Sat 10/15/2022 15:25
------------------------	----------------------------------	--

and in opposition of what we had been advised by Detective Angulo in his interview.

I explained the evidence of disturbed insulation, dirt swipes and prints on dusty ductwork, and loose hanging wires in the attic. Detective Christopher Singley said he had not been up there in two years. The last time was when he hooked up televisions at his supervisor's request, and his fingerprints would be up there because of back then. He acknowledged he was an administrator on the [REDACTED] program. He said it allows him to create and delete accounts. He did not even know if he was capable of deletion of data, or if it could be transferred to a [REDACTED]. Detective Christopher Singley was advised of the criminal violation we were investigating, and allowed him to view the statute.

Detective Christopher Singley was adamant that there had never been cameras inside the office to his knowledge. He advised Sergeant Serafini was there the whole time and was aware of the situation as a joke. He said no one encouraged, enticed, solicited, or forced him to place these cameras, and it was a joke he perpetrated now in its entirety by two coworkers, Detective Angulo and Sergeant Serafini.

As many differences in his story as we pointed out he was adamant he did nothing wrong criminally.

Detective Jose Angulo (Second Interview)

A second brief interview was conducted with Detective Angulo. During this second interview, Detective Angulo explained Detective Christopher Singley was last in the attic of the S.I.U. Office approximately two or three months prior to repair/examine a leak in the roof. Note, this statement completely contradicts Detective Christopher Singley's statement, as he stated he, Detective Christopher Singley, had not been in the attic of the S.I.U. Office for approximately three years. No further information of value was obtained other than he implicated Sergeant Serafini's knowledge of the incident. He was adamant he was not coerced, solicited, or enticed to assist and conceal the fact cameras were at the S.I.U. office.

Sergeant Jeffery Serafini (Second Interview Based Upon Further Implication)

Sergeant Serafini was interviewed a second time. We did this for clarification based upon the fact, Detective Scuoppo and I both thought Sergeant Serafini was only aware of the shelf camera. Sergeant Serafini said that he was aware of all three cameras. He was advised it was all a joke and Detective Christopher Singley had come up with the idea. On the day the cameras were installed in the office, while Lt. Wills was on vacation, Sergeant Serafini walked into the office as they had just completed hanging the [REDACTED] camera, and were starting the [REDACTED]. He was aware of these two, and later learned of the third camera.

When Lieutenant Wills saw the camera and called Detective Christopher Singley, he was retrieving the camera and a red light was noticed on the unit. Detective Christopher Singley said it turned on when he touched it, this is in stark contrast to Detective Christopher Singley's statement of these cameras were old and nonfunctional. He showed the Lieutenant that the sim card was empty, but again note that Detective Angulo referred to this camera as a cellular device.

Sergeant Serafini said the joke in its beginnings came from Lt. Wills' concern over the legitimate [REDACTED] and Detective Christopher Singley developed his joke from there. Sergeant Serafini had no idea or explanation why yesterday would be the day to remove the two remaining cameras. When I made reference to the [REDACTED] seen by other

REPORTING OFFICER NARRATIVE

St. Lucie County Sheriff's Office

OCA 22-11671
Date / Time Reported Sat 10/15/2022 15:25

Victim
WILLS, JAMIE

Offense
STALKING / HARASSMENT

employees, he was obviously angered and even made reference to being "played." He said if they were active cameras, he was unaware and something should happen.

Sergeant Serafini said he should have never let it happen. He said he would "take the heat" for his knowledge. Clarification was made that Sergeant Serafini was aware of all three [REDACTED] at some point.

Interview Synopsis

It is apparent that Detective Christopher Singley did place three cameras, known functional cameras, in Lieutenant Jamie Wills Office. After finding the first device, obvious in placement, Lieutenant Wills directed Detective Christopher Singley to never do this again. Detective Christopher Singley, Detective Angulo, and Sergeant Serafini all had knowledge of what Detective Christopher Singley called a "joke."

On the day Lieutenant Wills notified the unit in the morning of his request to reassign to another unit, January 1st, 2023, Detective Christopher Singley decided to remove the cameras. This was not logical in the fact that Christopher Singley would leave a hole in the ceiling and corner where these cameras once were, and this would have been likely noticed by Lieutenant Wills. When Lieutenant Wills made a second appearance on this day, a day he had taken vacation, it was noted by other Detectives that Detective Christopher Singley hid the drill he was going to use to remove said cameras.

Detective Christopher Singley made comments about the cameras being nonfunctional, but employees saw him removing the [REDACTED] type surveillance camera and pulling wires to break its attachment to the ceiling. Comments were additionally made about placing a tracker on a boss's vehicle at that's person's home at night.

These factors led Detectives to report concerns via the chain of command. In interviews, it was established that even though Detective Angulo and Sergeant Serafini had knowledge of the events, Detective Christopher Singley was the person who developed the idea and placed said cameras. Detective Christopher Singley denies all wrongdoing and states the cameras were not functional when other Detectives witnessed signs that they were based upon the fact Detective O'Steen witnessed the [REDACTED] wire being pulled as the [REDACTED] was being removed from the ceiling, causing resistance from this removal.

It is believed that Detective Christopher Singley did unlawfully record communications within the Lieutenant's Office at the Special Investigations Unit building, the hangar, under F.S.S. 934.02. At this time there is insufficient probable cause to support a warrant request.

Crime Scene Assistance

All electronic devices, cellular telephones and laptop computers were seized by the agency for replication and evaluation of both the recording system used and communications between the Detectives and outside.

Detective Christopher Singley's and Detective Angulo's agency issued vehicles were retained and stored for further evaluation.

I responded to the S.I.U. Office with Crime Scene Technicians and I.T. Personnel. Once on scene, additional crime scene collection of evidence was conducted based upon information received in the interviews. Let it be noted the

REPORTING OFFICER NARRATIVE

St. Lucie County Sheriff's Office

		OCA 22-11671
Victim WILLS, JAMIE	Offense STALKING / HARASSMENT	Date / Time Reported Sat 10/15/2022 15:25

██████████ that is connected to the ██████████ was collected last night, after the initial complaint was made.

I assisted both Crime Scene Technician's and I.T. Personnel in collecting evidence before leaving the scene.

October 17th, 2022

I did make telephone contact with Detective Christopher Singley to obtain his user name and password for the ██████████ administrator account. I also contacted Detective John Lopez to ask why he had a drive in his computer that was encrypted. Detective Lopez had no idea why and even that the drive was encrypted. This audio, recorded telephone calls, were placed into evidence.

I did also separately interview Detectives from the Warrants Division. Warrants Division Detectives sometimes utilize the S.I.U. Office for various reasons. Sergeant Nate Evans, Detective Brady Loupe, Detective Bryan Saliba, and Detective John Brady all had no knowledge of the incident. The only value information obtained was that Detective Saliba had been briefly assigned to the S.I.U. and at that time, the administrators of the ██████████ program were Lieutenant Pearson and Detective Snyder (resigned). These interviews were additionally placed into evidence.

October 18th, 2022

Detectives Scuoppo and Detective Sigmon did search the vehicles belonging to Detective Christopher Singley and Detective Jose Angulo in efforts of locating any digital stored evidence, or electronic transmission devices. None were located in the vehicles that had investigative value in this case.

I made contact with Lieutenant Jamie Wills in reference to a secondary interview based upon information he had thought of at a later time and called Captain Goodner. An interview was set for the following day.

October 19th, 2022

At approximately 0745 hours, I did met with Lieutenant Wills in Briefing Room #2. Lt. Wills advises he returned home and reflected about this incident. Lt. Wills remembered Detective Christopher Singley displaying to him what was on the sim card from the camera located on his bookshelf, ██████████. He said the video started out and was very "shaky", as if it were not stationary in the seconds he watched it before telling Detective Christopher Singley about his actions and making it very clear never to do this again. Lt. Wills again stressed how he felt this was the ultimate betrayal of trust to the agency and personally, and that it is an example of lack of integrity. This ██████████ video was also later placed into ██████████

I moved the Department Vehicle utilized by Detective Christopher Singley and Detective Jose Angulo out of the compound area and into regular parking spaces within the Criminal Investigation Division parking lot, as they had been searched and evaluated the day prior. Keys were still maintained by Crime Scene Personnel at this time.

I telephoned Detective Christopher Singley to ask where the ██████████ was that had been in the shelf camera, the ██████████ Camera. I referred to the one he displayed to Lieutenant Wills the day the camera was discovered sitting on the bookshelf. Detective Christopher Singley said the SD card was stored in a black two foot by two foot pelican brand case located next to Detective Jose Angulo's desk. I checked with Computer Forensics, and with Crime Scene

St. Lucie County Sheriff's Office

Victim WILLS, JAMIE	Offense STALKING / HARASSMENT	Date / Time Reported Sat 10/15/2022 15:25
------------------------	----------------------------------	--

Technicians. No one had collected any evidence from that location. Crime Scene Technician went to the Special Investigations Unit office, still restricted access, and collected the two (2) [REDACTED] in the exact location Detective Christopher Singley named. They were provided to Computer Forensics for evaluation.

October 24th, 2022
 (Santiago "Marty" Martinez)

Detective Martinez had been out of town on the day of the disclosure of the cameras. He was interviewed in Briefing Room #2 at approximately 0930 hours. Detective Martinez had no knowledge of any cameras within Lt. Wills Office. He said that he was not aware of a joke played by Detective Christopher Singley and Detective Jose Angulo. Detective Martinez also stated he would have told someone if this was done as a joke. He also said he never remembered there being active cameras in the Lieutenants office since he had been in the unit since 2015 or 2016.

Polygraph:

I called Detective Christopher Singley and offered a polygraph examination. He immediately said no based upon the fact he does not trust them, referring to polygraphs and CVSA's. I explained I was only offering a polygraph examination as an option and thanked him for his time.

I then called Detective Jose Angulo and offered a polygraph exam to which he immediately replied yes, he would take one. He said he was currently represented by counsel, and would consult them about the topic, but was willing. I advised Detective Angulo to contact me when he had a definite answer so I could set a polygraph examination up if it was yes. Detective Angulo never called back.

These telephone calls were audio recorded and placed into Evidence.com.

October 25th, 2022

I received information from [REDACTED] stating they did not have pertinent information requested via the subpoena. [REDACTED] offered no viable information. The [REDACTED] return is yet to be received and will be added to this case file when obtained.

Conclusion:

In speaking with Computer Forensics there is no viable link to prove that the cameras installed were active cameras, and there is no supporting data that they were actually transmitting at the times in question in this investigation. Reference Computer Forensics supplemental report documented under this case number for additional information.

Based upon my investigation it and there is a distinct lack of physical evidence to support any criminal charge. This case will be inactive. No further information at this time.

Incident Report Suspect List

St. Lucie County Sheriff's Office

OCA: 22-11671

1 Name (Last, First, Middle) SINGLEY, CHRISTOPHER COLE										Also Known As			Home Address 4700 W MIDWAY RD FORT PIERCE, FL 34981		
Business Address										[REDACTED]			Driver's License / State		
DOB	Age	Race	Sex	Eth	Hgt	Wgt	Hair	Eye	Skin	[REDACTED]					
[REDACTED]	[REDACTED]	W	M	N	600	190	BRO		LGT						
Scars, Marks, Tattoos, or other distinguishing features															
<i>Reported Suspect Detail</i>		Suspect Age		Race	Sex	Eth	Height		Weight		SSN				
Weapon, Type		Feature		Make		Model		Color	Caliber	Dir of Travel		Mode of Travel			
Veh Yr / Make / Model		Drs	Style		Color		Lic Plate / State		VIN						
Notes										Physical Char					

2 Name (Last, First, Middle) ANGULO, JOSE FERNANDO J										Also Known As			Home Address 4700 W MIDWAY RD FORT PIERCE, FL 34981		
Business Address ST LUCIE COUNTY SHERIFF DEPT 772-462-7300. DETECTIVE, MIDWAY RD										[REDACTED]			Driver's License / State		
DOB	Age	Race	Sex	Eth	Hgt	Wgt	Hair	Eye	Skin	[REDACTED]					
[REDACTED]	[REDACTED]	W	M		600	180	BLK	BLK	BLK						
Scars, Marks, Tattoos, or other distinguishing features															
<i>Reported Suspect Detail</i>		Suspect Age		Race	Sex	Eth	Height		Weight		SSN				
Weapon, Type		Feature		Make		Model		Color	Caliber	Dir of Travel		Mode of Travel			
Veh Yr / Make / Model		Drs	Style		Color		Lic Plate / State		VIN						
Notes										Physical Char					

Incident Report Suspect List

St. Lucie County Sheriff's Office

OCA: 22-11671

3	Name (Last, First, Middle) SERAFINI, JEFFREY ALLEN					Also Known As					Home Address 4700 W MIDWAY RD FORT PIERCE, FL 34981		
	Business Address												
DOB	Age	Race	Sex	Eth	Hgt	Wgt	Hair	Eye	Skin	Driver's License / State			
		<i>W</i>	<i>M</i>										
Scars, Marks, Tattoos, or other distinguishing features													
<i>Reported Suspect Detail</i>		Suspect Age	Race	Sex	Eth	Height	Weight	SSN					
Weapon, Type	Feature	Make	Model		Color	Caliber	Dir of Travel		Mode of Travel				
Veh Yr / Make / Model		Drs	Style		Color	Lic Plate / State		VIN					
Notes							Physical Char						

Case Status: *INACTIVE*

Case Mng Status: *INACTIVE-CM STATUS*

Occurred: *10/14/2022*

Offense: *STALKING / HARASSMENT*

Investigator: *SESSOMS, PERRY S (635)*

Date / Time: *10/27/2022 13:42:46, Thursday*

Supervisor: *MORASH, WILLIAM R (1589)*

Supervisor Review Date / Time: *10/27/2022 15:58:30, Thursday*

Contact:

Reference: *Follow Up*

Some of the people interviewed during this investigation said Lieutenant Keith Pearson had camera's inside his office when he was assigned to Special Investigations.

On October 20, 2022, I interviewed Lieutenant Pearson in reference to this case. Lieutenant Pearson was previously assigned to the Special Investigations Unit and had the same office as the victim.

I explained this case to Lieutenant Pearson and this is why I was interviewing him. Lieutenant Pearson told me he had old cameras inside his office but nothing was active or live. He said he had different old cameras on a shelf that showed the different types of cameras used over time. Lieutenant Pearson told me he never had any cameras installed inside his office when he was assigned to Special Investigations.

Case Status: *INACTIVE*Case Mng Status: *INACTIVE-CM STATUS*

Occurred: 10/14/2022

Offense: *STALKING / HARASSMENT*Investigator: *MOCK, CHRISTOPHER D (1386)*

Date / Time: 10/28/2022 10:31:12, Friday

Supervisor: *RHODES, BRIAN K (1191)*

Supervisor Review Date / Time: 10/28/2022 10:54:44, Friday

Contact:

Reference: Follow Up

On 10/15/2022 I was asked to conduct a forensic exam of several electronic devices that were collected as part of the investigation into this incident.

The following is synopsis of my exams and the subsequent findings:

I examined a [REDACTED] that had a [REDACTED] installed inside it. This camera had a manufacture label on it that stated it was made by [REDACTED]. This camera was functional and was only capable of transmitting video footage through an [REDACTED] video cable. This camera did not have audio or wireless capability and required an external [REDACTED] power connection.

I examined a fake [REDACTED] that had a [REDACTED] installed inside it. This camera had a silver label on it that identified it as [REDACTED] model # [REDACTED]. This camera was functional and was only capable of transmitting video footage through an [REDACTED] video cable. This camera did not have audio or wireless capability and required an external [REDACTED] power connection.

I examined a black and gold desk lamp that had a [REDACTED] camera installed in the base of it. This camera did not have any obvious commercial markings and was powered by an internal transformer that was [REDACTED]. This camera was capable of wireless data transmission; however, it was nonfunctional since the power transformer that provided power to the camera was nonfunctional.

I examined a [REDACTED]. This camera was capable of recording and transmitting audio and video and is powered by an internal battery. This internal battery was charged enough to allow the camera to be powered on. This camera only supported [REDACTED] and was not WIFI Capable. The label on the camera identified the [REDACTED]. This camera was capable of recording to [REDACTED] or live viewing by utilizing the [REDACTED] cell phone application. No SIM card or SD card was located within the camera.

I examined a [REDACTED]. This server contained [REDACTED] drives. These hard drives were forensically imaged by Det Sigmon and I utilized the Forensic images to conduct my examination. As part of my exam, I logged into the server and exported the user logs and connection logs for both the [REDACTED] and [REDACTED] that were setup on the device. These logs were compared to the recordings located on the server and no discrepancies were discovered. I reviewed all of the recordings stored on the server and none were related to this incident.

Case Status: *INACTIVE*Case Mng Status: *INACTIVE-CM STATUS*

Occurred: 10/14/2022

Offense: *STALKING / HARASSMENT*Investigator: *MOCK, CHRISTOPHER D (1386)*

Date / Time: 10/28/2022 10:31:12, Friday

Supervisor: *RHODES, BRIAN K (1191)*

Supervisor Review Date / Time: 10/28/2022 10:54:44, Friday

Contact:

Reference: *Follow Up*

I had IT provide me with a list of all [REDACTED] agency owned [REDACTED] utilized for covert camera surveillance. Of the [REDACTED] only 8 had been actively transmitting data within the past 30 days. I compared the list of active cradle points to the [REDACTED] sever and I was able to confirm that 6 of the 8 active [REDACTED] were attached to the [REDACTED]. The remaining two [REDACTED] were researched further and I was able to determine that the [REDACTED] was no longer attached to [REDACTED] and instead is attached to a larger standalone camera unit, which was not compatible with the cameras recovered in this incident. The remaining [REDACTED] remains unaccounted for but the connection logs for that device show it is still actively transmitting data with no change in its data transmission pattern due to this incident

Det Sigmon utilized [REDACTED] to extract the data from several cell phones related to this investigation. I utilized [REDACTED] to examine the data extracted by [REDACTED] as follows:

Det Angulo's agency issued cell phone was examined and no text chats, voicemails, web-searches, images, or videos were located that were relevant to this investigation. The [REDACTED] application was installed on this phone and last used on 9-5-2022. The camera attached to the [REDACTED] application was not the camera recovered as part of this incident.

Det Singley's agency issued cell phone was examined and no text chats, voicemails, web-searches, images, or videos were located that were relevant to this investigation. The [REDACTED] application was installed on this phone and last used on 11-09-2021. The camera attached to the [REDACTED] application was not the camera recovered as part of this incident.

Det Bolonka's agency issued cell phone was examined and no text chats, voicemails, web-searches, images, or videos were located that were relevant to this investigation. The [REDACTED] application was not installed on this phone.

Sgt Wills' agency issued cell phone was examined and no text chats, voicemails, web-searches, images, or videos were located that were relevant to this investigation. The [REDACTED] application was installed on this phone and the camera attached to the application was not the camera recovered as part of this incident.

Det Lopez's agency issued cell phone was examined and no text chats, voicemails, web-searches, images, or videos were located that were relevant to this investigation. The [REDACTED] application was installed on this phone and last used on 11-28-2021. The camera attached to the [REDACTED] application was not the camera recovered as part of this incident.

Det Mondragon's agency issued cell phone was examined and no text chats, voicemails, web-searches, images, or videos were located that were relevant to this investigation. The [REDACTED] application was installed on this phone and

Case Status: *INACTIVE*

Case Mug Status: *INACTIVE-CM STATUS*

Occurred: *10/14/2022*

Offense: *STALKING / HARASSMENT*

Investigator: *MOCK, CHRISTOPHER D (1386)*

Date / Time: *10/28/2022 10:31:12, Friday*

Supervisor: *RHODES, BRIAN K (1191)*

Supervisor Review Date / Time: *10/28/2022 10:54:44, Friday*

Contact:

Reference: *Follow Up*

the camera attached to the application was not the camera recovered as part of this incident.

Det Ridle's agency issued cell phone was examined and no text chats, voicemails, web-searches, images, or videos were located that were relevant to this investigation. The [REDACTED] application was installed on this phone and last used on 07-21-2021. The camera attached to the [REDACTED] application was not the camera recovered as part of this incident.

Det Osteen's agency issued cell phone was examined and no text chats, voicemails, web-searches, or videos were located that were relevant to this investigation. Within the images on the phone was a picture of an attic and an air duct that was dated 10/14/2022. The [REDACTED] application was installed on this phone and the camera attached to the application was not the camera recovered as part of this incident.

Det Martinez's agency issued cell phone was examined and no text chats, voicemails, web-searches, images, or videos were located that were relevant to this investigation. The [REDACTED] application was not installed on this phone.

The computers recovered as part of this incident were examined by Det Sigmon. Refer to his supplemental report for further details on those devices.

Case Status: *INACTIVE*

Case Mng Status: *INACTIVE-CM STATUS*

Occurred: 10/14/2022

Offense: *STALKING / HARASSMENT*

Investigator: *SIGMON, MARCUS D (943)*

Date / Time: 11/01/2022 08:30:53, Tuesday

Supervisor: *BRIGLIA, MATTHEW K (1126)*

Supervisor Review Date / Time: 11/01/2022 08:33:15, Tuesday

Contact:

Reference: *Follow Up*

On 10/15/2022, I was asked to forensically download multiple phones and laptops.

The following devices were examined in the lab:

10 iPhone 11's.

6 Dell Laptops.

██████████ containing 4 hard drives. Each containing 6 terabytes of storage.

2 SIM card, 5 MicroSD cards and 1 external hard drive.

Over the following week, the images of the devices were run through forensic software ██████████

██████████ This was done to determine if any unauthorized video/images/audio were stored on any device.

The forensic images of the laptops were processed in ██████████ No videos, images or audio were found that did not appear related to the unit's case work.

The forensic images of the ██████████ and the external hard drive were processed in ██████████

██████████ No videos, images or audio were found that did not appear related to the unit's case work.

██████████ were found on 10/20/2022. Both forensic images were processed in ██████████ On the ██████████ a blurry image was found. This image may be unrelated to case work. This image was given to the detective for review.

Case Status: *INACTIVE*Case Mng Status: *INACTIVE-CM STATUS*

Occurred: 10/14/2022

Offense: *STALKING / HARASSMENT*Investigator: *MOCK, CHRISTOPHER D (1386)*Date / Time: *11/28/2022 15:52:44, Monday*Supervisor: *MORASH, WILLIAM R (1589)*Supervisor Review Date / Time: *11/28/2022 15:57:55, Monday*

Contact:

Reference: *Assist Primary Officer*

In addition to conducting the forensic exams on the devices mentioned in my other supplement I, Detective Mock, also assisted in analyzing the scene and how the covert cameras were installed. The following is a synopsis of my on-scene investigation.

At the Sheriff's Office I inspected the two covert cameras and determined that they required an external [REDACTED] power source to operate and a [REDACTED] device to record video. After making this determination I responded to the scene along with CSI Carmichael to inspect the area they were recovered from. At the scene, I located where the cameras had been installed in the ceiling and then accessed the attic of the facility to inspect it for additional evidence.

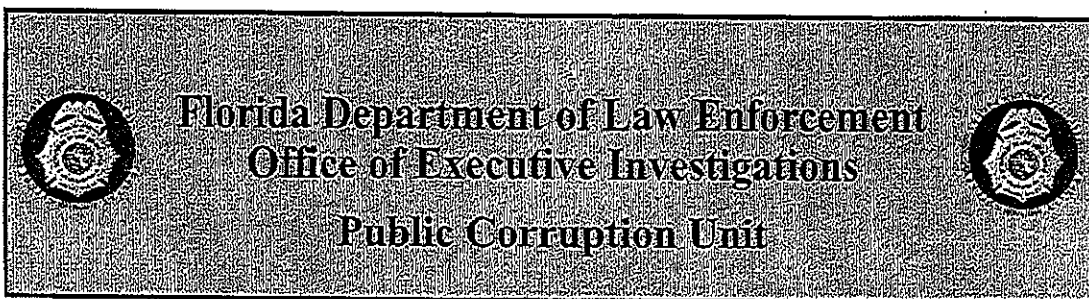
Inside the attic, I located the two areas where the [REDACTED] had been installed and searched those areas for any [REDACTED] sources. After an extensive search, no [REDACTED] or any [REDACTED] capable of providing power to the cameras were located. In the area near where the cameras were installed, CSI Carmichael informed me that she recovered an [REDACTED] I inspected this cable and noted that it contained three conductors, a left audio, a right audio, and a video. The video connector in the cable was broken off on one side and was recovered attached to one of the cameras. Despite this cable being discovered, no end point recording or viewing devices were located in the vicinity where the camera had been installed.

Further investigation of the scene located a second motion detector camera that had been installed for legitimate purposes. This camera obtained power by using a cable that was a combination of video signal and [REDACTED] power. I followed this cable to its end point and it was properly connected to the designated viewing device and there was no evidence that this cable had been used to power either of the covert cameras recovered from the scene.

Based on my exam of the covert cameras recovered and my investigation of the scene, there is no evidence that the cameras had been operational or were recording as it related to this incident.

EXHIBIT

C



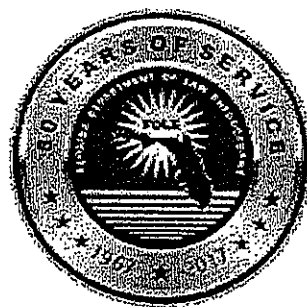
Investigative Summary

FDLE Case Number: EI-32-0086

**Subject(s): Ken Mascara, Kevin C. Carter,
Adam Fetterman, Bryan Beaty & Keith Pearson**

Judicial Circuit: Nineteenth Judicial Circuit

County: Saint Lucie



Case Agent: Keith B. Riddick

Phone: (850) 410-8249

Email: KeithRiddick@fdle.state.fl.us

FLORIDA DEPARTMENT OF LAW ENFORCEMENT

ELEVENTH JUDICIAL CIRCUIT OF FLORIDA

TABLE OF CONTENTS

EI-32-0086

- I. Investigative Summary
 - II. Investigative Reports
 - III. Related Items (see attached folder)
 - IV. Witness List
 - V. Investigative Cost Affidavit
-



FDLE

PUBLIC CORRUPTION UNIT

**OFFICE OF EXECUTIVE INVESTIGATIONS
INVESTIGATIVE SUMMARY**

CASE NUMBER: EE-32-0086 **DATE:** March 29, 2023

CASE AGENT: Inspector Keith B. Riddick

SUBJECT(S):

- Ken Mascara
- Kevin C. Carter
- Adam Fetterman
- Bryan Beaty
- Keith Pearson

INCIDENT DATE(S): Between May 15, 2020 and December 31, 2020

INCIDENT LOCATION(S): St. Lucie County, Florida

ALLEGATION(S)/ CHARGE(S):

- F.S.S. 104.071(1)(c): Election Code – Remuneration by candidate for services, support, etc.; a Third-Degree Felony
- F.S.S. 104.091(1): Election Code – Aiding, abetting, advising, or conspiring in violation of the code; a Third-Degree Felony
- F.S.S. 106.08(5)(a): Election Code – Contributions; limitations on; a Third-Degree Felony
- F.S.S. 106.09(2)(b): Cash Contributions and Contribution by Cashier's Checks; a Third-Degree Felony
- F.S.S. 817.155: Matters within Jurisdiction of Department of State, Fictitious, or Fraudulent Acts, Statements, and Representations; a Third-Degree Felony
- F.S.S. 777.011: Principal in First-Degree; a Third-Degree Felony and a First-Degree Misdemeanor
- F.S.S. 934.215: Unlawful Use of a Two-Way Communications Device; a Third-Degree Felony

INVESTIGATIVE PREDICATE:

On August 4, 2021, the Florida Department of Law Enforcement (FDLE) Office of Executive Investigations (OEI) received allegations of election fraud by St. Lucie County Sheriff, Ken Mascara. Per the allegations, Sheriff Mascara ordered and collaborated with St. Lucie County Sheriff's Office (SLCSO) members to recruit, facilitate the campaign of, and ultimately pay former SLCSO Deputy Sheriff Kevin C. Carter for registering as a Republican candidate in the 2020 St. Lucie County Sheriff election race. Per the allegations, Carter's "straw candidacy" was created by Sheriff Mascara in order to assist in his own re-election, by taking votes from Rich Williams, who was a registered Republican candidate in the Sheriff's Office election's race.

BACKGROUND OF 2020 ST. LUCIE COUNTY SHERIFF'S OFFICE ELECTION RACE

The following is a general timeline of events related to the 2020 St. Lucie County Sheriff's Office election:

- Ken Mascara, a perennial Democrat, was first elected as the Sheriff of St. Lucie County in November of 2000, taking office in January, 2001. Mascara officially declared his intent to run for 2020 re-election on January 17, 2018, SLCSO, per documents filed with the St. Lucie County Supervisor of Elections Office (SOE), again as a Democrat.
- Rich Williams, a former Florida Highway Patrol Trooper, first challenged Mascara in 2016, but lost to him by approximately 62.50% of the votes cast in the August Democratic Primary. According to subjects interviewed, Williams' campaign contained a substantial amount of "mudslinging" and personal attacks on Mascara and his family, part of which allegedly resulted in Mascara's daughter losing her job.
- On March 22, 2018, Williams filed a "Statement of Candidate" with the SOE as a precursor for his bid for Sheriff in the 2020 election. On August 2, 2018, Williams filed an "Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates form with the SOE that indicated he was then running as a Republican, having changed political parties sometime after his 2016 election campaign.
- On May 19, 2020, Kevin Carter filed to run for SLCSO as a Republican.
- On August 18, 2020, Carter won the Republican Primary, making him the candidate to run against Sheriff Mascara.
- On November 3, 2020, Sheriff Mascara won re-election for St. Lucie County Sheriff.

KEVIN CARTER'S 2020 CAMPAIGN FOR ST. LUCIE COUNTY SHERIFF

Pursuant to the investigation, OEI conducted multiple sworn interviews, reviewed bank records, phone records, elections documents, and documents provided by witnesses. As a result of the investigation, the following facts were established:

SLCSO Captain William "Bill" Hardman (Retired)

Hardman was interviewed pursuant to an Investigative Subpoena generated by the Florida 18th Judicial Circuit State Attorney's Office. As part of his interview, Hardman provided the following:

- Documents which he called a "Timeline" of his knowledge pertaining to Carter's campaign.
- Copies of emails and text exchanged between himself and Sheriff Mascara, related to Carter's campaign.
- Cellphone, which he alleged was provided by Sheriff Mascara to use as the phone line for Carter's campaign.

Hardman advised that on April 30, 2020, while employed at SLCSO, he engaged in the following email conversation with Sheriff Mascara, regarding the potential of having him run for Sheriff in the 2020 Republican primaries against Williams:

DATE	TIME	FROM	TO	MESSAGE
4/30/2020	18:15	Hardman	Mascara	My whole life
4/30/2020	18:16	Mascara	Hardman	You got a leg up on him then!! LOL
4/30/2020	18:16	Hardman	Mascara	On so many levels
4/30/2020	18:17	Mascara	Hardman	Yes If we went and filed you tomorrow and you sent an email out to get petitions signed electronically you think you can get 2000 in 10 days.
4/30/2020	18:49	Hardman	Mascara	We can try. If not I can always pull out
4/30/2020	18:18	Mascara	Hardman	I'm going to beat him like a red headed step child but I just don't want to go thru with it!!! Ugghhh
4/30/2020	18:19	Hardman	Mascara	What do I do after I beat him. Go to Gertrude and withdraw?
4/30/2020	18:19	Mascara	Hardman	Let me think about it tonight
4/30/2020	18:21	Mascara	Hardman	I would have to ask what would happen. I don't know. If you withdraw they might put him back on ballot.
4/30/2020	18:22	Hardman	Mascara	We need to know that
4/30/2020	18:25	Mascara	Hardman	Yep
4/30/2020	18:27	Hardman	Mascara	I would definitely do it and we could reach out thru social media to get the signatures but I want it end when he's out. No interest in November
5/1/2020	8:34	Mascara	Hardman	He still thinks crazy idea and makes me look weak. I told him I'm not weak just tired!!!!

Per Hardman, on May 9, 2020, Sheriff Mascara called and again asked him to run against Williams in the 2020 St. Lucie County Sheriff's race. Per Hardman, Sheriff Mascara wanted him to defeat Williams in the Republican primary, so Sheriff Mascara "wouldn't have to be bothered with him (Williams) any longer." Hardman acquiesced to Sheriff Mascara's request, but later found out, via SLCSO General Counsel (GC) Adam Fetterman, that in order to run in the Sheriff elections, he would have to resign from the SLCSO. Per Hardman, when it was determined that he couldn't run in the Republican primary, Sheriff Mascara advised him that they would have to find a candidate to run against Williams.

Hardman relayed that he contacted a local individual named Billy O'Dell and asked him to run for Sheriff in the Republican primary, but he refused. Hardman added that at Sheriff Mascara's direction, he also asked SLCSO Deputy Jim Buchheit to run in the same race. Per Hardman, Buchheit initially said he would run in the Republican

primary, but on May 15, 2020, Buchheit came to Hardman's office and retracted his agreement. Hardman further advised that Buchheit was told of Sheriff Mascara's reasons for asking him to run. Hardman stated that sometime between May 15, 2020, and May 18, 2020, Sheriff Mascara called him and advised that Kevin Carter had agreed to run against Williams. Per a review of the texts provided by Hardman, the following conversation occurred with Sheriff Mascara:

DATE	TIME	FROM	TO	MESSAGE
5/15/2020	16:54	Mascara	Hardman	He wants to talk to someone in R party I told him you would call
5/15/2020	16:54	Mascara	Hardman	[VCARD] (This details that a contact # was sent)
5/16/2020	9:51	Mascara	Hardman	Is he a military vet
5/16/2020	10:46	Mascara	Hardman	Gez This guy is a Home run. He might beat ME
5/16/2020	16:50	Mascara	Hardman	Is there a way to get his personnel file over weekend
5/16/2020	18:18	Mascara	Hardman	Ok Thx
5/16/2020	18:19	Hardman	Mascara	This is what's in the 3rd email Safe driver award 2008-2011-2012 Commendation 2012 High school transcript 1976 Basic Recruit Academy 1990 Affidavit of separation (retirement) stating left NOT under investigation or involving misconduct July 2012 If you need any of this sent to you let me know
5/16/2020	18:26	Mascara	Hardman	Looks great. Thx

Per email records provided by Hardman, the following email from account [REDACTED] to [REDACTED] on May 16, 2020, at 16:28, acknowledges the receipt of Carter's SLCSO personnel records:

Re: Kevin Carter - they are in separate files due to file size

From: Kevin Carter <[REDACTED]>
 To: [REDACTED]
 Date: Saturday, May 16, 2020 at 6:28 PM

[Handwritten signature]

Get it buddy

Sent from my iPhone

On May 16, 2020, at 6:10 PM, [REDACTED] wrote:

Sent from ProtonMail mobile

Original Message
 On May 16, 2020, 5:51 PM, Adam Goodner <[REDACTED]> wrote:

- <ME - Benefits (Red 4) - CARTER KEVIN - 549 --.pdf>
- <AK - Benefits (Red 4) - CARTER KEVIN - 549 - 07-31-2012 - FRS SEPARATION.Rtf>
- <KL - Benefits (Red 4) - CARTER KEVIN - 549 - FRS HIS 2.pdf>
- <PL - Appraisals (Red 1) - CARTER KEVIN - 549 --.doc>
- <PR - Benefits (Red 4) - CARTER KEVIN - 549 - 1-16-2013 - INSURANCE INCREASE.16>
- <HR - Applications (Green 6) - CARTER KEVIN - 549 - .pdf>
- <HR - Benefits (Red 4) - CARTER KEVIN - 549 - 04-25-2013 --.pdf>
- <HR - Background (Red 2) - CARTER KEVIN - 549 --.pdf>
- <HR - Benefits (Red 4) - CARTER KEVIN - 549 - 07-31-2012 - RESIGNATION.Rtf>
- <HR - Applications (Green 6) - CARTER KEVIN - 549 - 01-01-1993 - SPECIAL OPER TEAM - SWAT.pdf>

Hardman advised that the individuals that agreed to Sheriff Mascara's request to run against Williams, including himself, did so only to benefit his reelection campaign and were not, at first, offered any money for being willing to assist.

According to Hardman, on May 18, 2020, Carter went to Hardman's office around lunchtime and announced "so I guess I'm running for Sheriff" Hardman said he told Carter at that time, "we've got the paperwork, we've gotta get it filed out, blah, blah, blah. We'll handle it. You don't have to do anything. We'll take care of this."

Hardman advised that on the same date, he contacted Barbara Finster, a local accountant and friend, who agreed to be the campaign treasurer. Per Hardman, he gave Public Information Officer (PIO) Bryan Beaty the campaign documents, which PIO Beaty returned to Hardman in order for Finster to complete the campaign treasurer sections. Finster and Carter set up a bank account for his campaign at Seacoast Bank in Ft. Pierce. It should be noted that per Hardman, Finster was not aware of the true reasons for Carter running against Williams.

Hardman advised that he, Sheriff Mascara, SLCSO's Public Information Officer (PIO) Bryan Beaty, and GC Fetterman, were the primary agents in developing/managing Carter's campaign against Williams. Hardman explained that although GC Fetterman initially advised Sheriff Mascara to not introduce a candidate to run against Williams; once Carter agreed to run, GC Fetterman acted as the "advisor" for Carter's campaign. According to Hardman, the majority of the discussion and planning for Carter's campaign took place within the confines of the SLCSO Headquarters in Ft. Pierce, Florida.

Hardman advised that on May 20, 2020, Sheriff Mascara provided Hardman with a telephone to be used in the campaign. Hardman provided the OEI Inspectors with the cellular phone ([REDACTED]) and the receipt for its purchase, which he advised were originally provided to him by Sheriff Mascara. Hardman described the phone as being a "burner phone", one that service is bought on an as needed basis, that does not have a contract. Hardman said that after the campaign, Sheriff Mascara told him he wanted the phone back, but then told him to "get rid of it". Hardman described the conversation as; "You want me to take it down and drop it in the ocean or the river." To which Sheriff Mascara had replied, "That'd be good." Per a review of the aforementioned phone, it was activated on May 19, 2020, under the name of "Tom Thomas" but the "Billing Details" section of the record was blank without a listed name, address, or other identifying information. A review of the phone's call log identified completed calls to the St. Lucie County Supervisor of Elections Office and Seacoast Bank, while other calls were made to such persons as Gertrude Walker, the St. Lucie County Supervisor of Elections, Andrew Nail an associate of Kenny Nail the Chairman of the St. Lucie County Republican Party, Kevin Carter, Bill Greenlee, a member of the local news media, and GC Fetterman. The records also detailed that GC Fetterman called the campaign phone at approximately 2:02 PM on July 16, 2020, which appeared to be via call forwarding, and was called from the campaign phone on the same day at approximately 2:09 PM where a conversation ensued for approximately four minutes.

Per Hardman, on May 21, 2020, Hardman escorted Carter to PIO Beaty's office where, with Carter's input, PIO Beaty completed the remaining supervisor of election's office paperwork for the campaign. Per Hardman, PIO Beaty also set up and managed Carter's campaign email account in and from his office at the SLCSO Headquarters. Hardman explained that he rented a post office box for the campaign using his personal money. Hardman commented that the post office box was needed because they couldn't use Carter's residential address, as he planned to be in Pittsburgh during the majority of the campaign period. Per Hardman, only he and PIO Beaty had the keys to the post office box. Hardman relayed that GC Fetterman, orchestrated two "mailers" for the campaign. GC Fetterman created the mailers using contacts he developed in his previous political career as a member of the Florida House of Representatives. Per Hardman, GC Fetterman sent emails outlining the mailers and paid for them with money from the Carter campaign account. Hardman provided the OEI Inspectors with printed copies of those emails, which detailed Fetterman's business email address, [REDACTED]

Per texts provided by Hardman, on May 28, 2020, the following conversation occurred between him and Sheriff Mascara regarding PIO Beaty's assistance with documentation related to Carter's "ghost" candidacy for 2020 St. Lucie County Sheriff:

DATE	TIME	FROM	TO	MESSAGE
5/28/2020	16:45	Hardman	Mascara	What is wrong
5/28/2020	16:46	Mascara	Hardman	Email address at SOE is different
5/28/2020	16:47	Hardman	Mascara	Oh yeah Beaty told me he fucked it up but I thought he fixed it
5/28/2020	16:48	Mascara	Hardman	Nope
5/28/2020	16:48	Hardman	Mascara	I'll call him right now
5/29/2020	11:32	Hardman	Mascara	I don't have it Either Beaty or Kevin has it

Per texts provided by Hardman, on July 12, 2020, the following conversation occurred between him and Sheriff Mascara:

DATE	TIME	FROM	TO	MESSAGE
5/27/2020	12:51	Mascara	Hardman	I'll come to your office I left something in there for you

According to Hardman, after he received the aforementioned text, he went back to his office and found a bottle of liquor and \$10,000 in US currency inside his desk drawer. Hardman described the money as being "big bills, 100 and 50's." Hardman said that he received instructions from Sheriff Mascara, "to go find ten people to donate \$1000 or however – whatever denomination's possible to get that 10,000 in the (Carter campaign) account". Hardman advised he was able to do what Mascara requested with the help of several of his friends. It should be noted that the first entry on Carter's campaign finance report, of money received from one of the "enlisted donors" as delineated above, was dated May 28, 2020.

Per texts provided by Hardman, on July 9, 2020, the following conversation occurred between him and Sheriff Mascara regarding obtaining votes for Carter's "ghost" candidacy for 2020 St. Lucie County Sheriff:

DATE	TIME	FROM	TO	MESSAGE
7/9/2020	15:35	Mascara	Hardman	Yeaaaa
7/9/2020	15:36	Hardman	Mascara	I'm reaching out to all of my Republican friends and getting them on board. It's easy to do when I'm not asking for any money just a vote

Hardman provided the following July 11, 2020, email between himself ([REDACTED]), GC Fetterman [REDACTED] and Sheriff Mascara ([REDACTED]). Per the email, it appears that the three are discussing the design and content of a Carter campaign website ([REDACTED]) and mailers to be sent out to voters. It should be noted that the email contained an attachment titled "45612 Mascara Carter Diversion_6X...", which was later found to be a mailer created and/or designed by Mark Zubaly of Direct Mail

Systems, Inc. The attachments for the email provided by Hardman included a brief biography for Carter (to use in the website) and a mailer sample for the Carter campaign.

status - DO NOT FORWARD OR SHARE

From: Adam Festerman - [REDACTED]
 To: Billhardman - [REDACTED]
 Kenmascara - [REDACTED]
 Date: Saturday, July 11th, 2020 at 3:59 PM

Front page is up - [REDACTED]
 will still tweak a little [REDACTED]
 working on "About My Opponent page" - that should be up by Monday or Tuesday
 Mail is in process - If we are able to do 2 mail pieces we'll do one positive like
 attached (which will be updated with new pic and better text - this was just to show
 design) and one hit they are still working on
 Also - check out this bizarre screenshot I found from his facebook page that I'm
 going to try to find a way to use

--
 (please note - we are moving our office - ensure all mail is sent to the address below)
 Adam N. Festerman
 [REDACTED]
 10340 SW Village Center Dr., #222
 Port St. Lucie, FL 34987

847.62 KB of 2 files attached
 45612 Mascara Carter Diversion_OA... 49043 KB Screen Shot 2020-07-11 at 9:58:36 ... 087130 KB

Per texts provided by Hardman, on July 12, 2020, the following conversation occurred between him and Sheriff Mascara, in which they appear to further discuss the information contained in the aforementioned email:

DATE	TIME	FROM	TO	MESSAGE
7/12/2020	13:03	Mascara	Hardman	Instead of Sheriff's race explained Headline Elections 101
7/12/2020	13:04	Hardman	Mascara	I like it

Per emails provided by Hardman ([REDACTED]) from July 16, 2020, at 10:15 hours and July 18, 2020, at 19:42 hours, the following communications occurred between GC Fetterman ([REDACTED]) and Carter ([REDACTED]) in a string of emails with the subject line "Carter Take 3". The emails pertain to Carter's biographical information.

Re: First Carter Take 3

From: Carter <[REDACTED]>
 To: JFetterman <[REDACTED]>
 Date: Saturday, July 18, 2020

Son and raised in Pennsylvania and moved to Florida after serving 8 years in the US Navy and was Honorably discharged in 1986. Moved to St. Lucie County after being hired by the St. Lucie County Sheriff's Office in 1987.

Send from my Yahoo! Mail Smartphone, from somewhere in the world.

----- Original message -----
 From: [REDACTED]
 Date: [REDACTED]
 To: [REDACTED]
 Cc: [REDACTED]
 Subject: [REDACTED]

----- Original message -----
 On Jul 16, 2020, 6:43 PM, Kevin Carter <[REDACTED]> wrote:

----- Forwarded message -----
 From: GC Fetterman <[REDACTED]>
 Date: Thu, Jul 16, 2020 at 7:00 AM
 Subject: First Carter Take 3
 To: [REDACTED]

Kevin

Please approve this mail piece.

The only thing missing is the website www.kevincarterforsheriff.com which will be added on the line with the phone number and email address

Thank you

Per emails provided by Hardman ([REDACTED]), on July 18, 2020, at 19:48 hours, the following communication occurred, where Hardman instructed PIO Beaty ([REDACTED]) to forward an edited version of Carter's biographical information to GC Fetterman. Per the message, PIO Beaty was to forward the message to GC Fetterman using Carter's campaign email, to make it appear the Carter had approved the information.

(No Subject)

From: EB <[REDACTED]>
 To: Bbeaty <[REDACTED]>
 Date: Saturday, July 18th, 2020 at 7:48 PM

Take this text

I approve this with the following changes...

Son and raised in Pennsylvania and moved to Florida after serving 8 years in the US Navy and was Honorably discharged in 1986. Moved to St. Lucie County after being hired by the St. Lucie County Sheriff's Office in 1987.

Kevin Carter
 Republican candidate for St. Lucie County Sheriff

Send it to fettermann as if Carter himself is sending from the campaign email

Per emails provided by Hardman ([REDACTED]), on July 18, 2020, at 19:54 hours, the following communication occurred, where PIO Beary ([REDACTED]) advised Hardman that he complied with his instructions to forward the edited version of Carter's biographical information using Carter's campaign email.

Re: (No Subject)

From: BBeary@flsheriff.com
 To: BH [REDACTED]
 Date: Saturday, July 18, 2020 at 7:54 PM

Date

- > On Jul 18, 2020, at 7:48 PM, Bill [REDACTED] wrote:
- > I approve this with the following changes.....
- > Born and raised in Pennsylvania and moved to Florida after serving 8 years in the US Navy and was honorably discharged in 1986. Moved to St. Lucie County after being hired by the St. Lucie County Sheriff's Office in 1987.
- >
- > Kevin Carter
- > Republican candidate for St Lucie county sheriff

Per emails provided by Hardman ([REDACTED]), on July 20, 2020, at 22:54 hours, the following communication occurred, where GC Fetterman advised Sheriff Mascara and Hardman that Carter's campaign website ([REDACTED]) was functional. In the email, Fetterman also details how they would expend funds from Carter's campaign to "push traffic to the site".

Website is up

From: Adam Fetterman <[REDACTED]>
 To: BHardman <[REDACTED]>
 Mascara <[REDACTED]>
 Date: Monday, July 20th, 2020 at 12:12 PM

<http://www.carterforsheriff.com>

no more changes -- rest of the money will be going to paid ads to push traffic to the site

(please note - we are moving our office - ensure all mail is sent to the address below)

Adam M. Fetterman
 The Fetterman Firm, PLLC
 [REDACTED]
 Fort St. Lucie, FL 34987

Per texts provided by Hardman, on August 12, 2020, the following conversation occurred between him and Sheriff Mascara, in which they appear to discuss residual funds in the Carter campaign account:

DATE	TIME	FROM	TO	MESSAGE
8/12/2020	18:40	Hardman	Mascara	All campaign expenses are paid and we have \$475 left. Adam said no place to spend it so we can just leave it there for now. Any suggestions?
8/12/2020	18:41	Mascara	Hardman	Let's go get drunk.

On August 20, 2020, per SOE records from Carter's campaign account, a \$375 check was expended at a Ft. Pierce restaurant named Moonswiner's Barbecue (it should be noted that Moonswiner's Barbecue is owned by Danny and Tia Adkins, two of the people that Hardman asked to donate part of the \$10,000 given to him by Mascara to kick off the campaign.) Per Hardman, Sheriff Mascara had him provide a check in the amount of \$375.00 from Carter's campaign account, at Moonswiner's Barbecue, in return for cash in the same amount. Per Hardman, Sheriff Mascara instructed him to have the campaign treasurer list the aforementioned check in the SOE documents as a payment for a campaign volunteer lunch. Hardman advised that the volunteer lunch never took place (which was confirmed by Kelly Flood, a managerial employee at Moonswiner's Barbecue) and instead, Sheriff Mascara had him use the money to pay individuals that were waving signs for the Carter campaign. Hardman said Sheriff Mascara instructed him to deliver the cash to a female named Laurie (later identified as Laurie Strang) who was waving signs at a certain intersection in St. Lucie County. Hardman advised that he found Laurie and handed her the money, which was contained in a red solo cup, saying "Here, Sheriff Mascara told me to give you a drink." Per Hardman, she looked in the cup and she said, "I'm very thirsty, thank you." It should be noted that OEI Inspectors interviewed Strang, who stated that the aforementioned money was payment for her waving signs and coordinating the scheme that involved the sign-wavers, as described above.

Additionally, on the same date, per texts provided by Hardman, the following conversation occurred between him and Sheriff Mascara, in which they appear to discuss recruited voters for the Carter campaign:

DATE	TIME	FROM	TO	MESSAGE
8/20/2020	9:53	Hardman	Mascara	Carter officially filed and appeared on the ballot May 21. In 89 days we convinced 12,341 people to vote for him as a complete unknown candidate. That's a total of 138 new voters convinced every single day for 89 straight days. In 4 years rw convinced 7098 people to vote for him. That's 4.8 per day. That puts in an astonishing perspective. He should consider himself very lucky we didn't start 4 years ago.
8/20/2020	10:07	Mascara	Hardman	I'm sending that to joe edge to post.

It should be noted that per SOE records, Joe Edge, through his business The Tax Shoppe of SLC, Inc., his wife Maria Edge, and his brother Richard Edge, each donated \$1,000 to the Carter campaign.

Regarding payments made to Carter for his participation as a "ghost" candidate in the 2020 St Lucie County Sheriff race, Hardman informed the OEI Inspectors that Carter was given between \$4,400 and \$4,600 dollars as compensation. Hardman said the money originated from the Carter campaign account as two checks cashed at Moonswiner's Barbecue (at the direction of Sheriff Mascara) in the same manner as the referenced above and six checks written to individuals that were listed on the Carter campaign Financial Report as "Poll Watchers".

Hardman advised that Sheriff Mascara provided him the names of the poll watchers. Hardman then arranged for Finster (Carter's Campaign Treasurer) to obtain the counter checks from the bank, which Hardman provided to Sheriff Mascara to distribute to the poll watchers. Per Hardman, the poll watchers had the instructions that they were to cash the checks, and return the money to Sheriff Mascara. Hardman advised that once Sheriff Mascara had collected all the cash from the poll watchers, he gave it to Hardman who in turn provided it to Carter. In corroboration of this account, the following text conversation between Hardman and Mascara was identified from the text provided by Hardman:

DATE	TIME	FROM	TO	MESSAGE
10/14/2020	17:29	Mascara	Hardman	What's up!!! I need 6 signed Counter checks!!
10/14/2020	17:29	Hardman	Mascara	I'll call her tonight 590 each, right? (referring to the campaign treasurer)

OEI Inspectors interviewed all of the listed "poll watchers" who advised that they waved signs for the Carter campaign. Laurie Strang admitted to having enlisted her daughter Jessica, boyfriend Dugan and family friends, Przekop and Brown, to wave signs. Additionally, Strang stated that they cashed the checks and she collected the funds. Dugan, Jessica Strang, and Przekop corroborated Strang that the checks were cashed and the money returned to her. Laurie Strang further testified that she, accompanied by Dugan, took the cash from the checks to Sheriff Mascara. Dugan admitted to taking the money to Sheriff Mascara with Laurie Strang. Brown could not remember anything to do with the checks, reportedly due to his alcoholism, and Rogers (Sheriff Mascara's son's ex-girlfriend), denied cashing the check and returning the money to Sheriff Mascara. The following transactions were identified in corroboration to Hardman's statement and via copies of the "counter checks" that were obtained via a subpoena to Seacoast Bank. The financial records for Carter's campaign detailing the transactions, were filed with the SOE on October 30, 2020.

Type	Date	Vendor	Amount	Purpose
Expense	10/18/20	Matthew J. Przekop	\$595.00	Poll Watcher
Expense	10/18/20	Crystal Rogers	\$595.00	Poll Watcher
Expense	10/18/20	Dennis A. Dugan	\$595.00	Poll Watcher
Expense	10/18/20	Jessica L. Strang	\$595.00	Poll Watcher
Expense	10/18/20	Laurie A. Strang	\$595.00	Poll Watcher
Expense	10/18/20	Dennis Brown	\$500.00	Poll Watcher
Expense	10/28/20	Moonswiner's Bar-B-Q	\$602.97	Promotional Event
Expense	10/29/20	Moonswiner's Bar-B-Q	\$400.00	Promotional BBQ
		TOTAL	\$4,477.97	

Regarding Carter's participation in his own campaign, Hardman reiterated that Carter himself had very little to do with the campaign. Hardman estimated that Carter was only in St. Lucie County between 15% and 20% of the time from when he agreed to "run" to the general election in November. Hardman stated that Carter may have talked to the media "once or twice" and had "a couple" of pictures taken for campaign material.

ADDITIONAL INFORMATION REGARDING KEVIN CARTER'S 2020 CAMPAIGN FINANCE REPORT REVIEW

As part of this investigation, OEI Investigators reviewed the St. Lucie County SOE records Carter's campaign. Per the reviewed records, Carter's campaign received a total of \$23,550 in contributions. Per Hardman, the contributions originated from the \$10,000 provided by Sheriff Mascara, contributors that the Sheriff provided additional funds to donate, and from legitimate donations. Regarding the manner in which the \$10,000 provided by Mascara were able to be deposited into Carter's campaign, Hardman identified the following 11 individuals as "straw donors" to whom he provided cash funds. Per Hardman, the individuals were to donate to the Carter

campaign from their own accounts in the same amount that Hardman had provided. Per SOE records, the "straw" contributions were made as follows:

DATE	CONTRIBUTOR	AMOUNT
5/29/2020	Richard Gosser	\$ 1,000.00
5/29/2020	Patrick A. Hilburn	\$ 1,000.00
5/29/2020	Julia C. Hilburn	\$ 1,000.00
5/29/2020	Joseph E. Herndon	\$ 500.00
5/28/2020	Joe's Electric	\$ 1,000.00
5/29/2020	Randolph E. McDaniel	\$ 500.00
6/10/2020	Nicholas K. Kent	\$ 1,000.00
6/10/2020	Teresa K. Kent	\$ 1,000.00
6/1/2020	Johnny Ray Smith	\$ 1,000.00
6/19/2020	Danny Adkins III	\$ 1,000.00
7/23/2020	Tia Adkins	\$ 1,000.00
	Total	\$ 10,000.00

OEI Inspectors interviewed ten of the eleven donors listed above (Gosser died prior to this investigation) and all but Danny and Tia Adkins corroborated Hardman's statement that he had given them the funds to donate to Carter's campaign. Hardman advised that he knew some of the other contributors to Carter's campaign, but he had not provided them with the funds for donations. Per Hardman, Sheriff Mascara had given him several checks from individuals donating to the Carter campaign that Hardman in turn deposited into the campaign account.

It should be noted that per SOE records, the campaign account was closed on December 31, 2020.

ADDITIONAL INFORMATION REGARDING KEVIN CARTER'S 2020 CAMPAIGN WEBSITE AND PROPAGANDA

As previously detailed in this Investigative Summary, Hardman advised that GC Fetterman was tasked with and/or was responsible for all, or part of, Carter campaign's advertising. Per records provided by Hardman, OEI Inspectors determined that the companies Impressive Click, The Firefly Group, and Direct Mail Systems Inc. conducted work on Carter's campaign. OEI Inspectors obtained and reviewed records from the aforementioned companies related to Carter's 2020 St. Lucie County Sheriff campaign. Per the reviewed records, Impressive Click was hired by GC Fetterman to build Carter's campaign website. Additionally, it was determined that the company Direct Mail Systems Inc. was contracted by GC Fetterman to produce and deliver campaign mailers.

Stacy Weller Rainieri

Stacy Weller Rainieri advised she owned and operated the company The Firefly Group. Weller stated that she was contacted by GC Fetterman, who asked her to create a website for Carter's campaign. Weller further advised "since it was just website work, I passed it on to Andrew (identified as Andrew Webster), who is my web developer for all of my clients' websites through the company Impressive Click. Weller advised that she knew GC Fetterman, as she had previously met him when he was running for a State Representative seat several years ago, and from her company having worked on his re-election campaign. Weller further stated that she recognized the email address [REDACTED] as belonging to GC Fetterman.

Andrew Webster

Andrew Webster advised that he owned and operated the company [REDACTED]. Webster stated that he knew GC Fetterman from previous website work he performed for him, and his wife, through Weller and from GC Fetterman being his parent's neighbor. Webster also advised that he recognized the email address [REDACTED] from his previous dealings with GC Fetterman. Webster advised that he did not have direct contact with GC Fetterman related to Carter's campaign and that the interactions occurred by email, through Weller.

OEI Inspectors located an archived copy of Carter's campaign website created by Webster. The homepage of the website consisted of a photo of Carter, a logo for his campaign and a written statement titled "A Life of Service To Country and Community", all of which were present in email's related to GC Fetterman regarding Carter's campaign. Per reviewed records provided by Webster, the statement titled "A Life of Service To Country and Community" was almost verbatim to a Word document sent to Rainieri by GC Fetterman. Also, the website's page, titled "About My Opponent", was taken from an email sent to Rainieri by GC Fetterman on July 16, 2020 at 7:32 PM in which GC Fetterman notes that he had previously sent her an FHP internal affairs report regarding Carter's opponent (Rich Williams). The email also stated that it contained a letter from Indian River County Sheriff Deryl Loar, which was also located on Carter's campaign website.

Mark Zubaly

Zubaly advised that he owned and operated the company [REDACTED]. Per Zubaly, he first worked with GC Fetterman in 2016 regarding Sheriff Mascara's re-election campaign. Zubaly stated that during the summer of 2020, he was contacted by GC Fetterman, who asked him to work on the Carter campaign. Zubaly advised that he was contracted by GC Fetterman to produce direct mail for the Carter Campaign in order to help Carter win the primary. Zubaly commented that they used some of the same material in Carter's campaign that they had used in Mascara's 2016 campaign; materials that had been supplied by Mascara's campaign personnel. Zubaly understood that GC Fetterman, and others, believed that Carter was the "better of two evils" over the other Republican candidate, Rich Williams. Zubaly also said that he was given the impression, by GC Fetterman, that Carter "would be done after winning the primary." Zubaly stated that his sole contact, with the Carter campaign, was Adam Fetterman.

19th Judicial Circuit State Attorney Investigator Daniel Jones

According to Jones, Carter told him that Sheriff Mascara, personally approached him (Carter) and "asked him to run for Sheriff to kinda do away with the competition." Jones also advised that he became involved in Sheriff Mascara's election in 2020, he believed after the primary, and went to St. Lucie County Sheriff's Lieutenant Keith Pearson's home to pick up some Mascara campaign signs. While he was there, Pearson told him "there's the same assembly line where they made all the Carter signs, put 'em all together, distributed in the same way that they were doing Mascara's signs." Pearson also told Jones that he, and unknown other persons, had placed and taken down, various Carter campaign signs. Jones also stated that Pearson informed him that he (Pearson) had written the campaign biographical letter used in the St. Lucie County Supervisors of Elections' website for Carter.

SLCSO Lieutenant Scott Wells

Wells advised that during one of his night shifts, he was patrolling in the area of Midway Road and Melville Road in Ft. Pierce, Florida when he observed a suspicious vehicle parked on the side of Melville Road. Wells described the vehicle as a white "Sprinter type van" similar to one that the Sheriff's office had previously seized during an investigation. Wells stated that when he stopped behind the vehicle, he heard the sound similar to that of a weed

eater being run. Wells advised that he then observed Sheriff Mascara standing off to his right. Per Wells, he asked Sheriff Mascara if he was doing some late-night yard work, to which Sheriff Mascara replied "No, we're just out putting up some signs." Wells then noticed two other subjects, who he identified as SLCSO Lieutenant Keith Pearson, who appeared to be carrying a chainsaw, and a subject named John O'Neil who is a local businessman and long-time supporter of Sheriff Mascara. Wells stated that after the short conversation with Mascara he resumed his patrol, only to return a short time later to see that a Kevin Carter campaign sign was now standing where they had been working. According to Lt. Wells, the sign was located at 701 Midway Road, Ft. Pierce.

Linda and James Crist

Linda and James owned the aforementioned property where the Carter campaign sign was placed (Midway Road, Ft. Pierce). Both Linda and James Crist stated that they did not remember who asked to erect the sign described in Lt. Wells' statement, but did remember the Carter sign being at that location.

SLCSO Lieutenant Richard Ziarkowski

Lt. Ziarkowski advised that when he heard that Carter was running for Sheriff, he called Carter and asked him for campaign paraphernalia, such as shirts and signs. Lt. Ziarkowski stated that he did so because it was obvious, to him, that Carter was a ghost candidate and that if him supporting Carter was going to help his boss, Sheriff Ken Mascara, he would help.

ADDITIONAL INFORMATION REGARDING KEVIN CARTER'S 2020 CAMPAIGN

Based on a review of the documents provided by Hardman, OEI inspectors identified email communications between Sheriff Mascara, GC Fetterman, PIO Beaty, Carter, and Hardman, in which different aspects and actions (media, propaganda and financial) of Carter's 2020 "ghost" campaign for 2020 St. Lucie County Sheriff were discussed. The reviewed documents included multiple emails sent from Carter campaign email account. It should be noted that per reviewed documents and statements, Hardman, PIO Beaty, and GC Fetterman had access and appeared to have used the account to send emails as Carter. The following table details the identified emails, which were attached to this Investigative Summary as "Appendix A":

DATE	TIME	SENDER	RECIPIENT	SUBJECT
5/16/2020	18:10	Hardman	Mascara	Kevin Carter - they are in separate files due to file size
5/16/2020	18:28	Mascara	Hardman	Kevin Carter - they are in separate files due to file size
6/18/2020	12:20	Fetterman	Hardman	Send me pics
6/23/2020	15:49	Hardman	Carter	(No Subject)
6/24/2020	11:26	Hardman	Fetterman	Send me pics
6/24/2020	20:49	Fetterman	Hardman	mascara
6/30/2020	20:10	Carter	Hardman	(No Subject)
7/11/2020	15:59	Fetterman	Mascara / Hardman	status - DO NOT FORWARD OR SHARE
7/16/2020	10:15	Fetterman	Carter Campaign	FWD: Carter Take 3
7/18/2020	19:35	Hardman	Carter	Carter Take 3
7/18/2020	19:42	Carter	Hardman	FWD: Carter Take 3
7/18/2020	19:48	Hardman	Beaty	(No Subject)

7/18/2020	19:54	Beary	Hardman	(No Subject)
7/20/2020	22:12	Fetterman	Mascara / Hardman	Website is up
7/23/2020	12:53	Fetterman	Hardman	Re: Fw: Fwd: They had a retired Judge do the message
7/23/2020	12:56	Fetterman	Direct Mail Systems	status
7/24/2020	14:59	Fetterman	Hardman	FWD: status
7/29/2020	10:18	Fetterman	Direct Mail Systems	Fwd; Emailing: 45726 Mascara Carter Whack Take 1

Furthermore, the following individuals provided sworn statements regarding their knowledge of Carter's 2020 St. Lucie County Sheriff campaign:

SLCSO Administrative Assistant (AA) Melissa Reuther

AA Reuther was interviewed in relation to this investigation because she served as Hardman's SLCSO administrative assistant during the time of the 2020 election. AA Reuther advised that she was Hardman's assistant from "May or June of 2020 until August-ish of 2020." AA Reuther advised that, on one day, during the 2020 elections period, Hardman handed her a cell phone and asked her to record a voice mail greeting message on it. AA Reuther stated that, using verbiage supplied by Hardman, she attempted to record a message that said something to the effect of "This is the Kevin Carter campaign. Sorry we didn't reach you." Reuther advised that she was unable to successfully record the message and gave the phone back to Hardman. Reuther also relayed that sometime in June or July of 2020, Hardman asked her to come into his SLCSO office, where he showed her "thousands of dollars" in U.S. Currency that were in Hardman's desk drawer.

SLCSO Detective Andrew Bolonka

Det. Bolonka advised that he heard, from early on in the campaign, that Carter running for Sheriff was a sham, that people had been given money, via Hardman from Sheriff Mascara, to donate to Carter's campaign, and that SLCSO Deputy Jim Buchheit and St. Lucie County business man Jamie Hannan had also been asked to run by Mascara. Per Det. Bolonka, he also later spoke with former SLCSO Detective Scott Young who had told him that Mascara had asked him to run for Sheriff to "take out Williams."

Det. Bolonka recalled a conversation he had with Carter before the primary election in 2020 at a local establishment. Per Det. Bolonka, Carter stated that "Well, things are pretty messed up right now. All the rumors are starting to fly." Per Det. Bolonka, Carter stated this regarding, "Oh, you know. Like, you know, the election stuff. I'm supposed to be up in Pennsylvania laying low. I'm not even supposed to be around here. But now because all these rumors have started about the sham election, I'm kind of here now, you know, showing my face." Additionally, per Det. Bolonka, Carter added "Yeah. Oh, they got me wrapped up in this. Now it -- it's turned in -- turned into kind of a mess so now I'm stuck and I have to see it all the way through." Det. Bolonka advised that Carter never mentioned any names in reference to the conversation.

Det. Bolonka also recalled he had a conversation with SLCSO Lieutenant (Lt.) Scott Wells. According to Det. Bolonka, Lt. Wells informed him that while he was on patrol one night, he observed three suspicious persons. Lt. Wells stopped to check on them, and found the three individuals to be Sheriff Mascara, Lt. Pearson, and John O'Neill, a local businessman. Per Det. Bolonka, Lt. Wells advised that he left the area for a short time and when he drove back by the same area, he observed a Carter campaign sign where the three aforementioned individuals had been standing.

Former SLCSO Chief Deputy Garry Wilson

Wilson advised that he heard GC Fetterman make a comment, to the effect of, "We may have stepped over the line", in reference to the scheme to have Carter run as a Republican candidate in order to keep Rich Williams from reaching the elections.

**ADDITIONAL INFORMATION REGARDING THE SOLICITATION OF "GHOST" CANDIDATES
IN THE 2020 ST. LUCIE COUNTY SHERIFF RACE**

As stated previously in this Investigative Summary, Hardman advised that the following individuals were approached either by himself or Sheriff Mascara in order to convince them to enter the 2020 St. Lucie County Sheriff race against Williams.

William "Billy" O'Dell

O'Dell advised that Bill Hardman asked him to enter the 2020 St. Lucie County Sheriff race. Per O'Dell, Hardman also advised him that "they" would raise the money needed for registration as a candidate. O'Dell subsequently declined the invitation to run.

SLCSO Reserve Deputy James Buchheit

Buchheit advised that it was "joked about for years", that he was going to run for Sheriff, but he had not, that he could remember, been asked to run by current Sheriff Mascara, or anyone in the Sheriff's command staff.

SLCSO Detective Scott Young, Retired

Young advised that on May 15, 2020, Sheriff Mascara came to see him at his barber shop in Vero Beach, Florida. Young knew the date because Sheriff Mascara brought him a laminated copy of a newspaper article that announced the opening of the barbershop which he posted on the business' Facebook page that day. Young stated that Sheriff Mascara asked him to step outside, and when they did, Sheriff Mascara said "have a proposition for you." Per Young, Sheriff Mascara said, "You know, this guy running against me, Rick Williams, we need to get rid of him. So how would you like to be Sheriff?" Young thought Sheriff Mascara was kidding, but Sheriff Mascara then said "No, really. How'd you like to be Sheriff? You're a Republican, right?" To which Young replied that he was. Per Young, Sheriff Mascara then stated "Here's what I'm proposing. You're gonna run for Sheriff. And Sheriff's office is gonna back you and support you. And you'll win. And then you will run against me. And then, of course, you will concede, and I will become Sheriff." Young advised that he ultimately told Sheriff Mascara that he was not willing to run for Sheriff.

Young advised that he later heard about Carter running, so Young met with Sheriff Mascara and told him "I'm hearing a lot of rumors about fraud." Young said that Sheriff Mascara got "really offended" and commented "I don't know what -- that -- that's bullshit. I can support whoever I wanna support and back -- I" -- what." Young further advised that he later spoke with Carter about the campaign and Carter admitted that he too had been approached and asked to run against Williams. Carter reportedly told Young "Well, yeah, you know, he came to me and asked me to run and basically told me the same thing. He's gonna support me. And, uh, then I'll run and I'll concede and he'll be Sheriff. And that's what we did."

SUBJECT STATEMENTS

SLCSO Deputy Kevin Carter, Retired

OEI Inspectors conducted a sworn recorded interview of retired SLCSO Deputy Sheriff Kevin Carter pursuant to this investigation. Carter was asked how he became a candidate for the Sheriff of St. Lucie County in 2020. Carter advised that he was at the Sheriff's headquarters one day, talking to Sheriff Mascara, when Sheriff Mascara asked Carter "Can you do me a favor?" or something to that effect. When Carter asked Sheriff Mascara "What might that be?", he replied "how -- how about you running for Sheriff on Republican side?" Carter explained that at first he told Sheriff Mascara no, but Sheriff Mascara commented to him that the members of the Republican party in St. Lucie County didn't want Williams running because they considered him a "RINO" (a Republican in name only) as Williams had previously campaigned as a Democrat. Carter stated that "Um, so he kinda talked me into it." and "against my better judgment, I said 'Yeah'".

Carter relayed how Sheriff Mascara had him meet with Hardman, who became his "campaign manager". Per Carter, Hardman had him meet with Barbara Finster, who was the campaign treasurer. Carter described how he paid the filing fee with money given to him by Hardman, and filed the necessary paperwork with the supervisor of elections office. Carter also opened a bank account for the campaign, with Barbara Finster. Carter advised that he believed Hardman gave him the filing fee in cash while they were in Hardman's office at the SLCSO headquarters. It should be noted that contrary to Carter's statement, the filing fee, \$9,127.50, was paid with a check to "SLC Supervisor of Elections", from Carter's campaign account, dated June 10, 2020.

Carter advised that he understood that SLCSO Lt. Pearson was in charge of making his campaign signs and had put up some of the signs. Carter stated that he discussed "the paperwork side" of the campaign with PIO Beaty, while in Beaty's office at the SLCSO headquarters. Carter also believed that PIO Beaty was responsible for the campaign webpage. Carter stated that after he won the 2020 St. Lucie County Sheriff primary against Williams, Hardman told him "Campaign's done." Carter believed that after the primary, his campaign signs were pulled up and had no further involvement in the election. Carter estimated that he was only in St. Lucie County approximately 25% of the time during the 2020 election cycle.

Regarding payment for running in the 2020 St. Lucie County Sheriff race, Carter stated that he met with Hardman, in November of 2020, who gave him approximately \$4,600 in U.S. Currency as payment for his involvement in the race. Carter said that Hardman commented that he, Hardman, went to Mascara, and suggested they give Carter something, which Mascara authorized. Carter advised that he believed that the money came from Mascara.

SLCSO Public Information Officer Bryan Beaty

OEI Inspectors conducted a sworn recorded interview of PIO Beaty pursuant to this investigation. PIO Beaty explained that he first heard that Carter was going to run for Sheriff from Sheriff Mascara during a conversation in which SLCSO Major Brian Hester was also present. PIO Beaty advised that he said to Sheriff Mascara, "I told him that I thought that that was unnecessary." PIO Beaty also stated, "yeah, he just didn't want to have to go through the extended campaign period. He would've preferred to not go through the extended campaign period and have all of that happen again", in reference to Williams' comments about Sheriff Mascara and his family during the previous campaign(s). PIO Beaty advised that he only met Carter once during the campaign. PIO Beaty further advised that he, at the request of Hardman, searched SLCSO's archives of any photographs that Carter might be able to use in the campaign and printed out documents from the supervisor of election's office for Carter, at Hardman's request. PIO Beaty also stated that he edited Carter's campaign biography, at the request of Hardman or Sheriff Mascara. PIO Beaty further advised that he understood that GC Fetterman assisted Carter's campaign by facilitating the creation of the campaign flyers. It should be noted that PIO Beaty's statement was

in opposition to Hardman's and Carter's statements about PIO Beaty's knowledge of Carter's "ghost" candidacy and his involvement with the campaign's SOE paperwork and website management.

SLCSO Lieutenant Keith Pearson

OEI Inspectors conducted a sworn recorded interview of Lt. Pearson pursuant to this investigation. Pearson advised that he was approached by Hardman about using the workshop located in the backyard of his residence for Hardman to put together Carter campaign signs. Per Pearson, he also put up Carter campaign signs around the county, or distributed them to other persons, at Hardman's request. Pearson stated that he was not asked to support Carter by SCLSO Sheriff Ken Mascara. Per Pearson, he backed Carter because he did not want Williams to win the Republican primary race for St. Lucie County Sheriff. It should be noted that Pearson's statement was in opposition to Hardman's statement that he had knowledge of Carter's "ghost" candidacy, from Wells' statement that he had seen Pearson and Mascara together at the time a Carter campaign sign was being placed, and from Carter's statement that Pearson was in charge of making the campaign signs.

SLCSO General Counsel Adam Fetterman

OEI Inspectors conducted a sworn recorded interview of GC Fetterman, who was accompanied by his attorney, Brian Tannenbaum, Esq. GC Fetterman was asked various questions about his involvement with the Carter campaign for Sheriff in 2020. To each question, Mr. Tannenbaum replied by stating he was invoking his client's Fifth Amendment right to remain silent.

SLCSO Sheriff Kevin Mascara

Sheriff Mascara declined to provide a statement to OEI Inspectors related to this investigation.

SECTION II

INVESTIGATIVE FINDINGS

The following findings are based on the evidence, documentation, and information obtained during OEI's investigation:

- Per sworn statements and reviewed text communications, Mascara approached Hardman and advised of a plan to register Carter as a "ghost" candidate in the 2020 St. Lucie County Republican primary race, in order to take away votes from Republican candidate Williams.
- Per sworn statements, Mascara approached Carter and convinced him to register as a "ghost" candidate in the 2020 St. Lucie County Republican primary race, in order to take away votes from Republican candidate Williams.
- Per sworn statements and text communications, Sheriff Mascara communicated with Hardman via cellular phone text message to orchestrate the "ghost" candidacy of Carter in the 2020 St. Lucie County Republican primary race, in order to take away votes from Republican candidate Williams.
- Per SOE records, on May 19, 2020, Carter registered as a Republican candidate, in the 2020 St. Lucie County primary race at the direction of Sheriff Mascara, to assist him in taking votes away from Republican candidate Williams.

- Per sworn statements and text communications, Sheriff Mascara provided Hardman with \$10,000 in cash to facilitate Carter's campaign in the 2020 St. Lucie County Republican primary race.
- Per SOE records, Carter's campaign received a total of \$23,550 in contributions, to include the \$10,000 provided by Sheriff Mascara.
- Per sworn statements, Sheriff Mascara ordered Hardman to provide the aforementioned \$10,000 he provided, to individuals in order to have them in turn contribute to Carter's campaign.
- Per sworn statements, Hardman divided the \$10,000 provided by Sheriff Mascara to 11 individuals (in 10 amounts of \$1,000 and 2 amounts of \$500), who in turn contributed the funds to Carter's campaign.
- Per sworn statements and SOE records, the 11 individuals contributed the funds provided by Sheriff Mascara through Hardman, to the Carter campaign for 2020 St. Lucie Sheriff.
- Per sworn statements, Lt. Pearson knew of Carter's "ghost" candidacy in the 2020 St. Lucie County Republican primary race.
- Per sworn statements, Lt. Pearson assisted with producing and placing Carter's campaign signs throughout the county.
- Per sworn statements, Lt. Pearson was seen with Sheriff Mascara, placing a Carter campaign sign in the county.
- Per sworn statements PIO Beaty knew of Carter's "ghost" candidacy in the 2020 St. Lucie County Republican primary race.
- Per sworn statements PIO Beaty assisted with the SOE paperwork for Carter's campaign.
- Per sworn statements PIO Beaty assisted with Carter's campaign website management, to include Carter's biography.
- Per sworn statements and reviewed email communications, GC Fetterman knew of Carter's "ghost" candidacy in the 2020 St. Lucie County Republican primary race.
- Per sworn statements and reviewed records, GC Fetterman assisted with Carter's campaign by facilitating the creation of the campaign website.
- Per sworn statements and text communications, GC Fetterman communicated with the companies Impressive Click/The Firefly Group via email and telephone, to create Carter's campaign website in furtherance of Carter's "ghost" candidacy in the 2020 St. Lucie County Republican primary race.
- Per sworn statements and reviewed records, GC Fetterman assisted with Carter's campaign by facilitating the creation of the campaign mailers.
- Per sworn statements and text communications, GC Fetterman communicated with the company Direct Mail Systems Inc. via email and telephone, to create Carter's campaign mailers in furtherance of Carter's "ghost" candidacy in the 2020 St. Lucie County Republican primary race.

- Per sworn statements and text communications, Sheriff Mascara instructed Hardman to obtain \$4,477.97 through cashing 8 checks from the Carter Campaign.
- Per sworn statements, Sheriff Mascara instructed Hardman to have the aforementioned 8 checks falsely reported in financial records submitted to the SOE for Carter's campaign account, as either poll watcher (6 instances), promotional event (1 instance), or promotional BBQ (1 instance).
- Per sworn statements, the aforementioned funds obtained from the 8 cashed checks, were used to pay Carter (between \$4,400 and \$4,600) for his registration/participation as a "ghost" candidate, in the 2020 St. Lucie County Republican primary race.

Ken Mascara

Based on the facts developed during OEI's investigation regarding St. Lucie County Sheriff Ken Mascara, it can be determined that:

On multiple instances from May 15, 2020 through November 3, 2020, Ken Mascara, while being the incumbent St. Lucie County Sheriff and seeking re-election for said office in the 2020 election cycle, aided and promoted Kevin Carter's "ghost" candidacy in the 2020 St. Lucie County Sheriff race, to wit: Ken Mascara orchestrated and facilitated Carter's candidacy in part with a \$10,000 contribution to Carter's campaign. In addition, Ken Mascara participated in the management for the social and financial aspects of the campaign. Ken Mascara performed said actions in order to beat established Republican candidate Rich Williams in the 2020 St. Lucie County Sheriff race.

On May 27, 2020, Ken Mascara acting as a principal, aided, abetted, counseled, hired, or otherwise procured such offense to be committed, to wit: Ken Mascara provided a \$10,000 contribution to Bill Hardman and ordered him to make multiple contributions in the name of another for Kevin Carter's "ghost" candidacy in the Republican primary for St. Lucie County Sheriff. Such contributions in the name of another occurred on 11 separate instances between May 29, 2020 and July 23, 2020; which were falsely reported to the Florida Department of State (DOS).

On May 27, 2020, Ken Mascara, acting as a principal, aided, abetted, counseled, hired, or otherwise procured such offense to be committed, to wit: Ken Mascara made an aggregate cash contribution in excess of \$50, when he provided \$10,000 to Bill Hardman and ordered him to deposit the funds in Kevin Carter's "ghost" candidacy in the Republican primary for St. Lucie County Sheriff. Such contributions, by another, occurred on 11 separate instances for amounts of either \$500 or \$1,000, between May 29, 2020 and July 23, 2020; which were falsely reported to the DOS.

On October 14, 2020, Ken Mascara, acting as a principal, aided, abetted, counseled, hired, or otherwise procured such offense to be committed, when he knowingly and willfully ordered Hardman to make a false, fictitious, or fraudulent statement or representation, knowing the same to contain any false, fictitious, or fraudulent statement or entry, in a matter within the jurisdiction of the DOS, to wit: the Campaign Treasurer's Report submitted to the DOS on October 30, 2020, which contained false information of 8 separate expenses. The expenses included 6 instances in which checks in the amounts of \$595, were provided to individuals in exchange for the same amount returned in cash. Two additional checks were similarly cashed for the amounts of \$602.97 and \$400 respectively, from the restaurant Moonswiner's Bar-B-Q.

On multiple instances from April 30, 2020 through October 14, 2020, Ken Mascara used a two-way communication device to facilitate or further the commission of a felony, to wit: communicated via mobile device with Bill Hardman regarding the formation and financial management of Kevin Carter's 2020 "ghost" candidacy in the Republican primary for St. Lucie County Sheriff.

Kevin Carter

On multiple instances from May 15, 2020 through November 3, 2020, Kevin Carter, knowingly conspired, confederated, abetted, and aided Ken Mascara while he was the incumbent St. Lucie County Sheriff and seeking re-election for said office in the 2020 election cycle, to facilitate Kevin Carter's "ghost" candidacy in the 2020 St. Lucie County Sheriff race, to wit: agreeing to participate as a "ghost candidate and assisting/advising campaign. Kevin Carter performed said actions in order to assist Ken Mascara to siphon votes from established Republican candidate Rich Williams in the 2020 St. Lucie County Sheriff race.

On June 30, 2020 and July 18, 2020, Kevin Carter used a two-way communication device to facilitate or further the commission of a felony, to wit: communicated via email with Bill Hardman regarding the managing of the webpage and propaganda mailers for the Kevin Carter 2020 "ghost" candidacy in the St. Lucie County Sheriff race.

Adam Fetterman

On multiple instances from May 15, 2020 through November 3, 2020, Adam Fetterman, knowingly conspired, confederated, abetted, and aided Ken Mascara while he was the incumbent St. Lucie County Sheriff and seeking re-election for said office in the 2020 election cycle, to facilitate Kevin Carter's "ghost" candidacy in the 2020 St. Lucie County Sheriff race, to wit: assisting/advising on Carter's campaign pertaining to media/advertising and finance. Adam Fetterman performed said actions in order to assist Ken Mascara to siphon votes from established Republican candidate Rich Williams in the 2020 St. Lucie County Sheriff race.

On multiple instance from June 18, 2020 through July 29, 2020, Adam Fetterman used a two-way communication device to facilitate or further the commission of a felony, to wit: communicated via email and telephone with Ken Mascara, Kevin Carter, Bill Hardman, Stacy Rainieri of The Firefly Group, and Mark Zubaly of Direct Mail Systems Inc. regarding the creation of the webpage and propaganda mailers for Kevin Carter's 2020 "ghost" candidacy in the St. Lucie County Sheriff race.

Bryan Beaty

On multiple instances from May 15, 2020 through November 3, 2020, Bryan Beaty, knowingly conspired, confederated, abetted, and aided Ken Mascara while he was the incumbent St. Lucie County Sheriff and seeking re-election for said office in the 2020 election cycle, to facilitate Kevin Carter's "ghost" candidacy in the 2020 St. Lucie County Sheriff race, to wit: assisting/advising on Carter's candidate registration and assisting in the management of the campaign website. Bryan Beaty performed said actions in order to assist Ken Mascara to siphon votes from established Republican candidate Rich Williams in the 2020 St. Lucie County Sheriff race.

On July 18, 2020, Brian Beaty used a two-way communication device to facilitate or further the commission of a felony, to wit: communicated via email with Bill Hardman regarding the biographical information used for Kevin Carter's 2020 "ghost" candidacy in the St. Lucie County Sheriff race.

Keith Pearson

On multiple instances from May 15, 2020 through November 3, 2020, Keith Pearson, knowingly conspired, confederated, abetted, and aided Ken Mascara while he was the incumbent St. Lucie County Sheriff and seeking re-election for said office in the 2020 election cycle, to facilitate Kevin Carter's "ghost" candidacy in the 2020 St. Lucie County Sheriff race, to wit: assisting to create Carter's campaign propaganda signs, which he assisted in placing through St. Lucie County. Keith Pearson performed said actions in order to assist Ken Mascara to siphon votes from established Republican candidate Rich Williams in the 2020 St. Lucie County Sheriff race.

SECTION III STATE ATTORNEY

On September 15, 2021, Governor Ron DeSantis, signed Executive Order number 21-201, which transferred all authorities related to the prosecution of the matters described within this Investigative Summary to the State Attorney's Office in and for the Eighteenth Judicial Circuit. Pursuant to the Executive Order, a copy of this document, all related Investigative Reports and corresponding documents were provided to the appropriate State Attorney's Office for their review and prosecutorial determination.

EXHIBIT

D

From: [REDACTED]
Sent: Monday, October 31, 2022 4:32 AM
To: Ken Mascara [REDACTED] Adam Fetterman
<[REDACTED]>
Subject: Criminal wire tap investigation

Please read very important

Lt. J.T. Wills
Underwater Search and Recovery Team Commander
St. Lucie County Sheriff's Office
Special Investigations Section



Please note: Florida has a very broad Public Records Law. Most written communications to or from the St. Lucie County Sheriff's Office are public records available to anyone upon request. Your e-mail, including your e-mail address, may therefore, be subject to public disclosure.

Sheriff,

As you know I am listed and documented victim of a criminal wiretap investigation in which three cameras were documented and placed into my office without my knowledge or consent. Two of which were found several weeks after I gave Detective Singley a direct order not to hide cameras in my office again. I as a victim and a 32 year Professional Law Enforcement Officer have never seen a so called "joke" of this magnitude in all my years. The night I reported the crime to Lt. Defonzo in Internal Affairs I spoke with Major Hester and he advised me that he would ask you the next morning to have an outside agency to investigate. The following day I was asked to call my troops in including supervisors where it was relayed to me that CID detectives would be conducting the investigation and I was confused as to what had changed with the direction of an outside agency investigating, however I did not challenge the decision as I had full confidence that the supervision and Detectives assigned would do a proper and thorough job. As the investigation revealed Singley admitted to physically attaching two devices in my office and stated that they were placed at the same time as the first stand alone camera was found by me, approximately 4 weeks prior. Angulo admitted to knowing about two cameras and not the third and Serafini unfortunately admitted to being aware of the so called joke, but relayed to me after his interview that he had no idea there were wires attached. My concern with the investigation is to why a seasoned Detective would do such an unthinkable act as several members of the Sheriff's Office have expressed that this is no joke in any certain shape or form. The detectives interviewing Singley felt that he was not being truthfull and could not give a valid reason for not telling me about the other two cameras at the time I caught him with the first. Only saying that I was mad and didn't want to make me even madder. He was asked to take a polygraph and refused which could have consisted of one question answer. It is no secret that there is currently an active FDLE investigation going on and it appears especially reckless and foolish that any consideration of a joke of this nature would be taken as such. As I would like to believe this is a joke but there is no punch line. Last week I was called into the Majors office and spoke with the Chief and he asked if there was anything else I wanted as I was the victim. At the time, I was not aware that there were several subscriptions or aircards that we pay for monthly unaccounted for to the tune of 15 cards. When I asked purchasing for any [REDACTED] purchases there were none accounted for. I asked the former secretary of SIS if she had any records and I was advised that she never ordered cameras. My concern that because I left the [REDACTED] on my desk for weeks that possibly it may have been switched out as the information obtained from the one recovered was no source information. Although I have never purchased one for the unit it was stated that common practice was buying them with department credit cards. I am requesting a five year search of all supervisor credit card purchases of cameras, perhaps this may dispel my concerns. When I first reported the incident the following day I hand wrote a complaint requesting a criminal investigation to include requesting my rights be protected under the United States Whistleblower Law. I was told I was being transferred to road patrol and I requested that my transfer that was decided as Jan 1st 2023 remain in place and it was granted. As a victim of a suspected crime the criminal case appears to going in the direction of being suspended. I am writing you this email to inform you that as a victim and also a Professional Law Enforcement Officer with significant integrity, I have a duty to officially notify all deputies, detectives and federal law enforcement partners that were in my office, to include DEA agent to include a background investigator for TFO positions, ATF Agent and PSLPD Narcotics supervisors. I will also be officially notifying FDLE because atleast two subpoenaed witnesses were in my office. I am

also notifying you and legal counsel Adam Fetterman that I have retained legal counsel Attorney Clay Yates and will be counselling with Civil Rights Attorney Sid Garcia with any and all questions moving forward.