

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

CASE NO. 05-2013-CF-064037-BXXX-XX

STATE OF FLORIDA,

Plaintiff,

v.

WILLIAM MATTHEW DUPREE,

Defendant,

SCOTT ELLIS
2013 NOV 13 A 10:11
FILED IN VIERA-06
CLERK OF CIR. CT.
BREVARD CO. FL.

NOTICE OF INTENT TO OFFER EVIDENCE BY MEANS OF A CERTIFICATION
OF RECORDS OF REGULARLY CONDUCTED BUSINESS

COMES NOW the State of Florida by and through the undersigned Assistant State Attorney pursuant to Section 90.803(6), Florida Evidence Code, and provides notice to the Defendant of the State's intent to offer evidence by means of a certification of records of regularly conducted business, as follows:

1. Phone records of **AT&T Mobility** for phone numbers (321) 243-7752 and (321) 431-4568. (Copies provided to Defendant in discovery as **FDLE Related Item No. 58**).
2. Banking records of **Bank of America** Account Numbers ending in [REDACTED], and [REDACTED] in the name of **MA or Joan Needelman**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 24**).
3. Banking records of **Bank of America** Account Number ending in [REDACTED] in the name of **Needelman Needelman Associates, Inc.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 51**).



4. Banking records of **Bank of America** Account Number ending in [REDACTED] in the name of **Needelman Needelman Associates, Inc.** and Account Numbers ending in [REDACTED], [REDACTED], and [REDACTED], in the name of **MA or Joan Needelman**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 78**).

5. Banking records of **Bank of America** Account Number ending in [REDACTED] in the name of **Eligere Strategies, LLC**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 101**).

6. Banking records of **Bank of America** Account Numbers ending in [REDACTED], [REDACTED]; and [REDACTED] in the name of **William M. or Danielle R. Dupree**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 106**).

7. Banking records of **Bank of America** Account Number ending in [REDACTED] in the name of **Jason Steele Campaign**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 112**).

8. **Capital One Bank** credit card records of Account Number ending in [REDACTED] in the name of **William M. Dupree**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 54**).

9. **Capital One Bank** auto finance records of Account Number ending in [REDACTED] in the name of **William M. Dupree**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 57**).

10. Banking records of **Citizens Bank** Account Number ending in [REDACTED] in the name of **BlueWare, Inc.**; Account Number ending in [REDACTED] in the name of **RoseWare LLC**; Account

Number ending in [REDACTED] in the name of **Blueland LLC**; and Account Numbers ending in [REDACTED] and [REDACTED], in the name of **Rose M. Harr**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 29**).

11. **Discovery** credit card records of Account Number ending in [REDACTED] in the name of **Joan M. Needelman**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 108**).

12. **Economic Development Commission of Florida's Space Coast** records related to **BlueWare LLC**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 59** and **60**).

13. **FIA Card Services** credit card records of Account Number ending in [REDACTED] in the name of **Mitch A. Needelman/Joan Needelman** and Account Number ending in [REDACTED] in the name of **Mitch Needelman**. (Copies provided to Defendant in discovery as **FDLE Related Items No. 86** and **131**).

14. Banking records of **Fifth Third Bank** Account Number ending in [REDACTED] in the name of **BlueWare, Inc.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 37**).

15. Banking records of **First Bank** Account Number ending in [REDACTED] in the name of **BlueWare, Inc.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 16**).

16. Banking records of **First Bank** Account Number ending in [REDACTED] in the name of **BlueWare, Inc.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 26**).

17. Banking records of **First Bank** Account Number ending in [REDACTED] in the name of **Rose M. Harr**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 32**).

18. **GE Capital Retail Bank** credit card records of Account Number ending in [REDACTED] in the name of **Mitch A. Needelman**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 84**).

19. Banking records of **JP Morgan Chase Bank** Account Numbers ending in [REDACTED] and [REDACTED] in the name of **Nicholas Geaney/Kelly Geaney**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 39**).

20. Banking records of **JP Morgan Chase Bank** Account Number ending in [REDACTED] in the name of **Mitchell Needelman/Joan M. Needelman**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 81**).

21. **JP Morgan Chase Bank** credit card records for Account Number ending in [REDACTED] in the name of **Mitch Needelman/Needelman Needelman Associates**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 115**).

22. Banking records of **JP Morgan Chase Bank** Account Number ending in [REDACTED] in the name of **BlueGem LLC**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 113**).

23. Banking records of **PNC Bank** for Account Number ending in [REDACTED] in the name of **Mitch Needelman dba FI Retired Workers Assc.** and Account Number ending in [REDACTED] in the name of **Campaign for Mitch Needelman Clerk of Court** (Copies provided to Defendant in discovery as **FDLE Related Item No. 20**).

24. Banking records of **PNC Bank** for Account Number ending in [REDACTED] in the name of **For the Kids of Brevard, Inc.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 63**).

25. Banking records of **Regions Bank** for Account Number ending in [REDACTED] in the name of **Sloan Mackenzie Public Affairs.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 67**).

26. Banking records of **Regions Bank** for Account Number ending in [REDACTED] in the name of **BlueGem LLC.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 118**).

27. Banking records of **Regions Bank** for Account Number ending in [REDACTED] in the name of **William M. Dupree.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 82**).

28. Banking records of **SunTrust Bank** for Account Number ending in [REDACTED] in the name of **Clerk of Courts – Brevard County.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 11; 76; and 117**).

29. Banking records of **Wells Fargo Bank** Account Numbers ending in [REDACTED] in the name of **Eligere Strategies LLC.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 18 and 41**).

30. Banking records of **Wells Fargo Bank** Account Numbers ending in [REDACTED] and [REDACTED] in the name of **William Matthew Dupree.** (Copies provided to Defendant in discovery as **FDLE Related Item No. 34**).

31. Banking records of **Wells Fargo Bank** Account Numbers ending in [REDACTED] in the name of **Jason Steele**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 110**).

32. Banking records of **Wells Fargo Bank** Account Number ending in [REDACTED] in the name of **Mitchell & Joan Needelman**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 132**).

33. Banking records of **US Bank** Account Number ending in [REDACTED] in the name of **Mitch Needelman**. (Copies provided to Defendant in discovery as **FDLE Related Item No. 134**).

Wherefore, the State of Florida provides this notice and requests the Defendant file any objection in advance of trial as required by Section 90.803(6)(c), Florida Statutes. By providing this notice the State does not waive any other provision of the evidence code which may provide a separate legal basis for the admission of these items in evidence.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy has been furnished by E-MAIL to **FRITZ SCHELLER, ESQ., ATTORNEY FOR DEFENDANT**, at **FSCHELLER@FLUSALAW.COM**, this 7th day of November, 2013.

PHIL ARCHER
STATE ATTORNEY

BY: 

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