

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

STATE OF FLORIDA

AMENDED INFORMATION NO CAPIAS

VS.

MITCHELL NEEDELMAN
(COUNTS 1, 3, 4, 6, 7, 8)

CASE NUMBER: 052013CF064037AXXX

WILLIAM MATTHEW DUPREE
(COUNTS 2, 3, 5, 8)

CASE NUMBER: 052013CF064037BXXX

ROSE HARR
(COUNTS 2, 3, 5, 6)

CASE NUMBER: 052013CF064037CXXX

INFORMATION

COUNT 1: BRIBERY (F2)
COUNT 2: PRINCIPAL TO COMMIT BRIBERY (F2)
COUNT 3: CONSPIRACY TO COMMIT BRIBERY (F3)
COUNT 4: BID TAMPERING (F2)
COUNT 5: PRINCIPAL TO COMMIT BID TAMPERING (F2)
COUNT 6: ENTERING CONTRACT RESULTING FROM BID TAMPERING (F2)
COUNT 7: OFFICIAL MISCONDUCT (F3)
COUNT 8: UNLAWFUL CAMPAIGN CONTRIBUTIONS (F3)

SCOTT ELLIS
2013 DEC -5 A 11:48
FILED IN VERA-45
CLERK OF CIR. CT.
BREVARD CO. FL.

IN THE NAME AND BY AUTHORITY OF THE STATE OF FLORIDA, PHIL
ARCHER, STATE ATTORNEY, THROUGH THE UNDERSIGNED DESIGNATED
ASSISTANT STATE ATTORNEY, CHARGES THAT:

COUNT 1: IN THE COUNTY OF BREVARD, STATE OF FLORIDA, on or between March
16, 2012 and January 7, 2013, MITCHELL NEEDELMAN, being a public servant, to wit:
CLERK OF THE COURT IN AND FOR BREVARD COUNTY, FLORIDA, did unlawfully and
corruptly request, solicit, accept, or agree to accept for himself or another, a pecuniary or other
benefit not authorized by law, to wit: MONEY FROM BLUEWARE LLC, BLUEGEM LLC,
ROSEWARE LLC, with the intent or purpose to influence the performance of any act or
omission which the person believes to be, or the public servant represents as being, within the
official discretion of the public servant, to wit: ENTERING CONTRACT(S) INVOLVING
BLUEWARE LLC, BLUEGEM LLC, ROSEWARE LLC, contrary to Sections 838.015(1) and
838.015(3), Florida Statutes,

COUNT 2: IN THE COUNTY OF BREVARD, STATE OF FLORIDA, on or between March
16, 2012 and January 7, 2013, WILLIAM MATTHEW DUPREE, **ROSE HARR**, did knowingly



and unlawfully aid, abet, counsel, hire, or otherwise procure a public servant to wit: MITCHELL NEEDELMAN CLERK OF THE COURT IN AND FOR BREVARD COUNTY, FLORIDA, to unlawfully and corruptly request, solicit, accept, or agree to accept for himself or another, a pecuniary or other benefit not authorized by law, to wit: MONEY FROM BLUEWARE LLC, BLUEGEM LLC, ROSEWARE LLC, with the intent or purpose to influence the performance of any act or omission which the person believes to be, or the public servant represents as being, within the official discretion of the public servant, to wit: ENTERING CONTRACT(S) INVOLVING BLUEWARE LLC, BLUEGEM LLC, ROSEWARE LLC, contrary to Sections 777.011, 838.015(1), and 838.015(3), Florida Statutes,

COUNT 3: IN THE COUNTY OF BREVARD, STATE OF FLORIDA, on or between March 16, 2012 and January 7, 2013, MITCHELL NEEDELMAN, WILLIAM MATTHEW DUPREE, **ROSE HARR**, did knowingly and unlawfully agree, conspire, combine, or confederate, each with the other and each with uncharged co-conspirator NICHOLAS GEANEY, for public servant MITCHELL NEEDELMAN CLERK OF THE COURT IN AND FOR BREVARD COUNTY, FLORIDA to unlawfully and corruptly request, solicit, accept, or agree to accept for himself or another, a pecuniary or other benefit not authorized by law, to wit: MONEY FROM BLUEWARE LLC, BLUEGEM LLC, ROSEWARE LLC, with the intent or purpose to influence the performance of any act or omission which the person believes to be, or the public servant represents as being, within the official discretion of the public servant, to wit: ENTERING CONTRACT(S) INVOLVING BLUEWARE LLC, BLUEGEM LLC, ROSEWARE LLC, contrary to Sections 777.04(3), 777.04(4)(d), 838.015(1), and 838.015(3) Florida Statutes,

COUNT 4: IN THE COUNTY OF BREVARD, STATE OF FLORIDA, on or between March 16, 2012 and May 23, 2012, MITCHELL NEEDELMAN, being a public servant, to wit: CLERK OF THE COURT IN AND FOR BREVARD COUNTY, FLORIDA, did unlawfully with corrupt intent influence or attempt to influence the competitive bidding process undertaken by any state, county, municipal, or special district agency, or any other public entity, for the procurement of commodities or services, to wit: INVITATION TO NEGOTIATE (ITN) WITH BREVARD COUNTY CLERK OF COURT FOR SCANNING SERVICES, by disclosure of material information concerning a bid or other aspects of the competitive bidding process when such information is not publically disclosed, contrary to Sections 838.22(1)(a) and 838.22(5), Florida Statutes,

COUNT 5: IN THE COUNTY OF BREVARD, STATE OF FLORIDA, on or between March 16, 2012 and May 23, 2012, WILLIAM MATTHEW DUPREE, **ROSE HARR**, did knowingly and unlawfully agree, conspire, combine, or confederate, directly or indirectly, with a public servant, to wit: MITCHELL NEEDELMAN CLERK OF THE COURT IN AND FOR BREVARD COUNTY, FLORIDA, to unlawfully with corrupt intent influence or attempt to

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influence the competitive bidding process undertaken by any state, county, municipal, or special district agency, or any other public entity, for the procurement of commodities or services, to wit: INVITATION TO NEGOTIATE (ITN) WITH BREVARD COUNTY CLERK OF COURT FOR SCANNING SERVICES, by disclosure of material information concerning a bid or other aspects of the competitive bidding process when such information is not publically disclosed, contrary to Sections 838.22(1)(a), 838.22(3), and 838.22(5), Florida Statutes,

COUNT 6: IN THE COUNTY OF BREVARD, STATE OF FLORIDA, on June 29, 2012, MITCHELL NEEDELMAN, **ROSE HARR**, did enter into a contract for commodities or services, to wit: SCANNING CONTRACT BETWEEN BLUEGEM LLC AND BREVARD COUNTY CLERK OF COURT, knowing that said contract was secured by a public servant acting in violation of Section 838.22(1)(a), Florida Statutes, contrary to Sections 838.22(4) and 838.22(5), Florida Statutes,

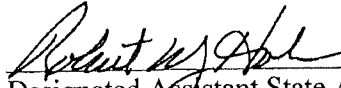
COUNT 7: IN THE COUNTY OF BREVARD, STATE OF FLORIDA, on or between March 16, 2012 and January 7, 2013, MITCHELL NEEDELMAN, being a public servant, to wit: CLERK OF THE COURT IN AND FOR BREVARD COUNTY, FLORIDA, did unlawfully with corrupt intent conceal, cover up, destroy, mutilate, or alter official record(s) or official document(s) or cause another person to perform such an act, to obtain a benefit for MITCHELL NEEDELMAN, WILLIAM MATTHEW DUPREE, ROSE HARR, BLUEWARE LLC, BLUEGEM LLC, ROSEWARE LLC, or to harm another, contrary to Sections 838.022(1)(b) and 838.022(3), Florida Statutes,

COUNT 8: IN THE COUNTY OF BREVARD, STATE OF FLORIDA, on or between April 25, 2012 and December 3, 2012, MITCHELL NEEDELMAN, WILLIAM MATTHEW DUPREE, did knowingly and willfully make or accept two or more contributions in excess of \$500 to BREVARD COUNTY CLERK OF COURTS candidate MITCHELL NEEDELMAN'S campaign for election to office, to wit: \$4,500 CASHIER'S CHECK PURCHASED BY ELIGENE STRATEGIES LLC TO E-ONE MARKETING; \$500 PERSONAL CHECK FROM DUPREE TO ERIC TIRADO AT E-ONE MARKETING; \$4,500 PERSONAL CHECK FROM DUPREE TO ERIC TIRADO AT E-ONE MARKETING; \$9,091 WIRE TRANSFER FROM ELIGENE STRATEGIES LLC TO SPECTRUM MARKETING; \$1,000 PERSONAL CHECK FROM NEEDELMAN TO TIGHTLINE PRODUCTIONS; \$3,000 CASH FROM NEEDELMAN TO IAMSCO MFG ANE ZIPMAIL; \$3,000 PERSONAL CHECK FROM MARK ANTHONY TO TIGHTLINE PRODUCTIONS; \$5,000 PERSONAL CHECK FROM NEEDELMAN TO TIGHTLINE PRODUCTIONS; \$1,350 PERSONAL CHECK FROM NEEDELMAN TO TIGHTLINE PRODUCTIONS; \$7,000 TRANSFER FROM PERSONAL MONEY MARKET SAVINGS BY NEEDELMAN TO SPECTRUM MONTHLY A/K/A SPECTRUM MARKETING; \$500 CASH FROM NEEDELMAN TO EWIRENESS, INC.; \$185 CHECK FROM NEEDELMAN & NEEDELMAN ASSOCIATES TO EWIRENESS, INC., contrary to Sections 106.08(1) and 106.08(7)(b), Florida Statutes,

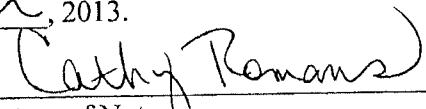
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AND against the peace and dignity of the State of Florida.

I hereby state under oath that I am instituting this prosecution in good faith, and I certify that I have received testimony under oath from the material witness or witnesses for the offense(s).


Designated Assistant State Attorney
Eighteenth Judicial Circuit
Florida Bar No. 0285951

Personally appeared before me, Designated Assistant State Attorney ROBERT WAYNE HOLMES, who is personally known to me, who being first duly sworn, says that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense(s), and says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true and which, if true, would constitute the offense(s) therein charged. Sworn to and subscribed before me in Brevard County, Florida, this 5th day of December, 2013.


Signature of Notary

