

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

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

STATE OF FLORIDA,

Plaintiff,

vs.

ROSE MARY HARR,

Defendant,

FILED IN VERA-DE  
CLERK OF CIR. CT.  
BREVARD CO. FL.

2013 SEP 27 A 10:46

SCOTT ELLIS

NOTICE OF INTENT TO USE SUMMARY EVIDENCE

COMES NOW the State of Florida by and through the undersigned Assistant State Attorney pursuant to Section 90.956, Florida Evidence Code, and provides notice to the Defendant of the State's Intent To Use Summary Evidence through the testimony of qualified witness, **Callie Rhoads, Certified Senior Crime Intelligence Analyst II, Florida Department of Law Enforcement**, as follows:

1. Phone records of **AT&T Mobility** for phone numbers **(321) 243-7752** and **(321) 431-4568**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 58; copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 65).

2. Banking records of **Bank of America** Account Numbers ending in [REDACTED]; and [REDACTED] in the name of **MA or Joan Needelman**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 24; copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 25).

3. Banking records of **Bank of America** Account Number ending in [REDACTED] in the name of **Needelman Needelman Associates, Inc.** (Copy of records provided to Defendant in discovery

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as FDLE Related Item No. 51; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 52).**

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]; and [REDACTED] in the name of **MA or Joan Needelman.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 78; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 79 and 80).**

5. Banking records of **Bank of America** Account Number ending in [REDACTED] in the name of **Eligere Strategies, LLC.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 101; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 102).**

6. Banking records of **Bank of America** Account Numbers ending in [REDACTED] and [REDACTED] in the name of **William M. or Danielle R. Dupree.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 106); **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 107).**

7. **Capital One Bank** credit card records of Account Number ending in [REDACTED] in the name of **William M. Dupree.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 54; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 55).**

8. 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] [REDACTED] in the name of **Rose M. Harr**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 29; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 30**).

9. **Discovery** credit card records of Account Number ending in [REDACTED] in the name of **Joan M. Needelman**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 108; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 109**).

10. **FIA Card Services** credit card records of Account Number ending in [REDACTED] in the name of **Mitch A. Needelman/Joan Needelman**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 86; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 97**).

11. Banking records of **Fifth Third Bank** Account Number ending in [REDACTED] in the name of **BlueWare, Inc.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 37; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 38**).

12. Banking records of **First Bank** Account Number ending in [REDACTED] in the name of **BlueWare, Inc.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 16; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 17**).

13. Banking records of **First Bank** Account Number ending in [REDACTED] in the name of **BlueWare, Inc.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 26; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 27).**

14. Banking records of **First Bank** Account Number ending in [REDACTED] in the name of **Rose M. Harr.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 32; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 33).**

15. **GE Capital Retail Bank** credit card records of Account Number ending in [REDACTED] in the name of **Mitch A. Needelman.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 84; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 85).**

16. Banking records of **JP Morgan Chase Bank** Account Numbers ending in [REDACTED] and [REDACTED] in the name of **Nicholas Geaney/Kelly Geaney.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 39; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 40).**

17. **JP Morgan Chase Bank** credit card records for Account Number ending in [REDACTED] in the name of **Mitch Needelman/Needelman Needelman Associates.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 115; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 116).**

18. Banking records of **JP Morgan Chase Bank** Account Number ending in [REDACTED] in the name of **BlueGem LLC**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 113; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 114**).

19. 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**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 20; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 21**).

20. Banking records of **PNC Bank** for Account Number ending in [REDACTED] in the name of **For the Kids of Brevard, Inc.** (Copy of records provided to Defendant in discovery as FDLE Related Item No. 63; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 64**).

21. Banking records of **Regions Bank** for Account Number ending in [REDACTED] in the name of **Sloan Mackenzie Public Affairs**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 67; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 68**).

22. Banking records of **Regions Bank** for Account Number ending in [REDACTED] in the name of **BlueGem LLC**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 118; copy of **Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 119**).

23. Banking records of **Regions Bank** for Account Number ending in [REDACTED] in the name of **William M. Dupree**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 82; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 83**).

24. Banking records of **SunTrust Bank** for Account Number ending in [REDACTED] in the name of **Clerk of Courts – Brevard County**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 11; 76; and 117; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item Nos. 12 and 77**).

25. Banking records of **Wells Fargo Bank** Account Numbers ending in [REDACTED] in the name of **Eligere Strategies LLC**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 18 and 41; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 19**).

26. Banking records of **Wells Fargo Bank** Account Numbers ending in [REDACTED] and [REDACTED] in the name of **William Matthew Dupree**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 34; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 35**).

27. Banking records of **Wells Fargo Bank** Account Numbers ending in [REDACTED] in the name of **Jason Steele**. (Copy of records provided to Defendant in discovery as FDLE Related Item No. 110; **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 111**).

28. 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); **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 133).**

29. 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); **copy of Summary Evidence provided to Defendant in discovery as FDLE Related Item No. 135).**

#### CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy has been furnished by U.S. mail hand delivery/electronic delivery/ fax to MARK, L. HORWITZ, ESQ., ATTORNEY FOR DEFENDANT, 17 EAST PINE STREET, ORLANDO, FL 32801, this 26<sup>th</sup> day of September, 2013.

PHIL ARCHER  
STATE ATTORNEY

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