

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 16-20549-CR-LENARD/OTAZO-REYES(s)(s)
CASE NO. 16-23148-CV-WILLIAMS

UNITED STATES OF AMERICA,)
)
<i>Plaintiff,</i>)
)
PHILIP ESFORMES, <i>et al.</i> ,)
)
<i>Defendants.</i>)
_____)

ESFORMES’ MOTION FOR A PROTECTIVE ORDER
RE: CONDITIONS OF VIEWING AND COPYING RULE 16 DISCOVERY

The Defendant, PHILIP ESFORMES, through undersigned counsel, respectfully moves this Court, pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Rule 501 of the Federal Rules of Evidence, the work-product privilege, the Court’s supervisory power, and the Fifth and Sixth Amendments of the United States Constitution for a Protective Order:

(1) Requiring the United States Department of Justice Fraud Division, the United States Attorneys Office for the Southern District of Florida (“USAO”), and the Federal Bureau of Investigation (“FBI”) to assign at least one attorney-prosecutor and one or more federal agents who *are not* members of the Fraud Division, the USAO or the Miami field office of the FBI and who have not previously had any role in this case whatsoever to assume custody and control over all the other discovery at the warehouse that is not turned over to a Special Master or Magistrate Judge; and

(2) Requiring the FBI to move the boxes of records seized in *United States v. Guillermo Delgado, et al.*, Case No. 14-CR-20359-JEM(s) from the FBI’s off-site storage facility to the government-controlled warehouse in Miramar, Florida.

In support of these requests, Mr. Esformes states the following:

1. The current Prosecution Team has identified over 1800 (possibly up to 2200) bankers' boxes of discovery as relevant to this case and has essentially conditioned the Esformes Defense Team's access to and review of this discovery on a waiver of Mr. Esformes' work product privilege. The 1800+ boxes contain items seized in four separate cases: *Greater Miami Behavioral Health ("GMBH")*, *Morales*, *Delgado*, and *American Therapeutic Corporation*. All of these boxes are in possession of the FBI's Miami Field Office and are either being stored in their Miramar warehouse or at an off-site storage facility. The FBI never labeled approximately 800 of the boxes seized in connection with the *Delgado* case; many are nondescript, brown boxes, with no identifying marks. The Esformes Defense Team comprised of lawyers, paralegals, and other staff have visited the FBI's warehouse in Miramar, Florida, and its off-site storage facility on numerous occasions to begin reviewing these boxes.

2. The Prosecution Team has instituted a set of rules that it requires the defense to follow in order to gain access to the discovery. To be able to review the boxes, one of the defense attorneys has to email the two lead prosecutors on this case, Elizabeth Young and Drew Bradylyons, and copy the lead FBI case agent, Scott Mitchell. The email has to identify the date and time that the defense proposes to review the boxes and the name of every individual who will be going to the FBI warehouse or off-site storage facility as a member of the defense team. The boxes are made available depending on whether there is an FBI agent available to monitor the defense team's review of the boxes. Usually the agent who monitors the defense team's review of the boxes is lead case agent Mitchell. If Mitchell is not available, another FBI member of the Prosecution Team is assigned to monitor the defense team's review. Once members of the defense team arrive at the FBI warehouse or at the off-site storage facility, they are handed a piece of paper to write down their names. The

agent counts all the Esformes Defense Team members in the room and compares it against the names on the list to ensure that everyone has signed in.

3. The agent then sits in the same room with the Esformes Defense Team claiming that he/she must ensure that no one on the team – which always consists of at least one lawyer, but many times consists of up to four Florida Bar licensed lawyers – tampers with the evidence. If the boxes that the Esformes Defense Team intends to review are all permanently stored in the same room where the Esformes Defense Team is directed to work in, the Esformes Defense Team is allowed to grab whatever boxes it needs to begin its review. If the boxes are not permanently stored in a room, but rather somewhere in the warehouse where Esformes Defense Team members are prohibited from entering, a team member has to ask the agent monitoring the defense's review to arrange to have specific boxes brought out.

4. The GMBH boxes are kept in the main conference room of the FBI's Miramar warehouse. Although the conference room is large, the working area for the Esformes Defense Team is small both because the conference room is largely taken up by the sheer number of boxes but also because at times there are many members of the Esformes Defense Team present to conduct the discovery review. Whenever the Esformes Defense Team wants to review the GMBH boxes, the Esformes Defense Team is asked to work in the same conference room where the GMBH boxes are permanently stored. The conference room has four picnic-like tables set up against each other to form a square where the defense team is allowed to work. A few feet away is another picnic-like table where agent Mitchell, or another agent if he's not available, sits *to monitor the defense team while they work*. Because of Mitchell's presence, members of the Esformes Defense Team cannot

comfortably speak with one another about the records they're reviewing or how they relate to defense theories.

5. The *Delgado* boxes are kept in an off-site storage facility in deplorable conditions that will be discussed later in this motion. As with the GMBH boxes, the *Delgado* boxes are all contained in the same place where the Esformes Defense Team is instructed to work in – essentially, a storage closet. Therefore, a member of the Esformes Defense Team can grab any box he/she wants to review. Because the storage closet is so small and so full of boxes, members of the Esformes Defense Team have had to work while sitting *on the floor* or outside in the hallway of the storage facility while other members of the public sometimes walk by to access their own storage closets. All the while, Agent Mitchell or another agent on the prosecution team is sitting nearby *to monitor the defense team's review of the boxes*.

6. The approximately 200 boxes of seized records in *Morales* are stored in an area of the Miramar warehouse where the Esformes Defense Team is not given permission to enter. When reviewing the *Morales* boxes, the Esformes Defense Team is required to identify for an FBI agent what boxes it would like to review and then wait for those boxes to be brought to them. Thus, the FBI can *easily keep track of the boxes that the defense is reviewing* and, in that manner, figure out what work the defense is doing. As with GMBH and Delgado, an agent sits in the same room as the Esformes Defense Team *monitoring the Esformes Defense Team's review of documents*.

7. The Esformes Defense Team has not yet had an opportunity to begin reviewing the American Therapeutic Corporation boxes at the warehouse.

8. For obvious reasons, Esformes Defense Team Attorney Rossana Arteaga-Gomez has repeatedly requested that DOJ Trial Attorney Elizabeth Young assign *completely independent* taint

agents to assist the team during visits to the warehouse. For example, on January 13, 2017, Ms. Arteaga-Gomez wrote to Ms. Young: “we ask that the agents present while we review the discovery be taint agents. We don’t want any agents involved in the prosecution present.” *See* Email, 1/13/17.¹ In a follow-up email, Ms. Arteaga-Gomez explained the reason for the request: “As we review all of the discovery at the warehouse, we are generating work product that we need to keep confidential. It’s impossible to keep from revealing work product to the agent under the conditions that we’re working in.” *See* Email, 1/13/17.

9. Ms. Young agreed to have a taint agent assist the Esformes Defense Team when its members visit the facility, but no independent taint agent has been assigned to assist on a permanent basis. On January 27, 2017, Ms. Young wrote to Ms. Arteaga-Gomez that providing the Esformes Defense Team with a taint agent would present resource and logistical hurdles so evidence reviews with a taint agent would be more limited. She also insisted that Ms. Arteaga-Gomez advise her ahead of time *what boxes the defense team would be reviewing* and explained that the Esformes Defense Team would only be allowed to review 10 boxes per day. *See* Email, 1/27/17.

10. On January 31, 2017, Ms. Arteaga-Gomez responded to the inadequacy of these procedures:

Due process requires that we have as much access as necessary to the discovery to effectively defend Mr. Esformes. When you mention that we’ll only have access to 10 boxes per day, I’m assuming you’re referring to the Morales boxes, which are the only set of boxes that are not all kept in a room that we can work in. The Morales boxes alone are approximately 200 boxes. Giving us access to 10 boxes per day is unreasonable. We ask that you and/or the FBI please make arrangements so that more taint agents are available to assist us during our review....

^{1/} Counsel have not attached the emails cited herein as exhibits but will submit them upon request from the Court or if the Prosecution Team contests the accuracy of the facts recited in this motion.

As for ordering the Morales boxes in advance, please provide the name and email address of the taint agent who will be assisting us. We'll order the Morales boxes in advance from the taint agent, of course with the understanding that he will not be communicating to you or anyone on the prosecution team what boxes we're requesting. Again, when we work on the Morales boxes, we're likely going to need to see more than 10 boxes in one day so please make arrangements to enable us to do that.

See Email, 1/31/17.

11. On February 2 and 6, 2017, Ms. Arteaga-Gomez followed up with Ms. Young requesting the name and email address of the taint agent who would be assisting the Esformes Defense Team on their next visit to the warehouse. *See* Emails, 2/2/17 & 2/6/17. Ms. Young never provided that contact information.

12. On February 9, 2017, the Esformes Defense Team visited the off-site storage unit. Although the defense was told that a taint agent would be present, lead Prosecution Team Agent Mitchell was present. Agent Mitchell let the defense team and an alleged taint agent, Sean Kibby, inside the warehouse. Although Agent Mitchell left the facility, he came back at least one more time while the Esformes Defense Team was conducting the review. Three alleged taint agents took turns *monitoring the Esformes Defense Team's discovery review* that day. The taint agent who arrived at the facility around 1:00 PM to replace Agent Kibby refused to identify himself until Ms. Arteaga-Gomez informed Agent Mitchell, who was present to escort this agent inside the facility, that the Esformes Defense Team was entitled to know the identity of the alleged taint agents present during their discovery review. Agent Hilton Yam then reluctantly identified himself. Agent Yam was later replaced by alleged taint Agent Pat Koeth. *The defense has since learned that Agent Koeth has conducted investigations in this case and is therefore not independent from the Prosecution Team*

at all. Agent Koeth later refused to identify himself to a different member of the defense team who had not been present at the discovery review at the off-site storage facility on February 9, 2017.

13. Because Ms. Arteaga-Gomez had repeatedly asked Ms. Young for the name and email address of a taint agent with whom she could communicate with and had not received a response, Ms. Arteaga-Gomez took the opportunity to inform Agent Mitchell while he was at the off-site storage facility that the defense was requesting that a taint agent be assigned to the case. Agent Mitchell responded *that a taint agent would not be assigned and that taint agents would be assisting the defense on a voluntary basis*, whatever that means. Ms. Arteaga-Gomez explained that the Esformes Defense Team could not send out boxes for scanning under those conditions because then the Prosecution Team would be able to track what boxes the defense was reviewing in their preparation. Agent Mitchell responded that *he would always need to know* what boxes left the warehouse or the off-site storage facility for scanning as the evidence was impounded under his name. Agent Mitchell attempted to justify the Government's position by invoking "chain of custody" concerns, but he could not adequately explain why a taint team of federal agents could not equally safeguard the discovery and maintain chain of custody.

14. In addition to the problem of having a member of the Prosecution Team assigned *to monitor the Esformes Defense Team's work*, the off-site storage facility where the *Delgado* boxes are being maintained is not appropriate for discovery review. The boxes are stored in three storage closets, each measuring approximately 5 feet by 10 feet. Within that space, the FBI has stored approximately 1200 boxes, of which approximately 800 are not labeled. The boxes are haphazardly piled on top of each other. Boxes have fallen over as a member of the Esformes Defense Team has attempted to remove one of the boxes from a pile. Some of these boxes may be as heavy as 40

pounds. There is also very limited space to review the contents of the boxes. In essence, only about four members of the Esformes Defense Team can sit at a collapsible table to review the discovery and the table has to be placed in the hallway directly outside of the storage closets. The storage closets have *dust, silverfish, lizards, spiders and black mold*. Members of the Esformes Defense Team have experienced *coughing, sneezing, sniffing, headaches, facial pressure, fatigue and nasal congestion*.² The storage facility is also *freezing cold and the lighting is poor*. On November 4, 2016, Mr. Rossana Arteaga-Gomez emailed Ms. Young, copying DOJ Trial Attorney Drew Bradylyons and Agent Mitchell, to inform them of the deplorable working conditions at the off-site storage facility. Ms. Arteaga-Gomez asked that the Delgado boxes be moved to the main Miramar warehouse and to move the GMBH boxes to the off-site storage facility. *See* Email, 11/6/16. Mr. Bradylyons responded that the Prosecution Team was aware of the conditions at the off-site storage facility and that there may be additional room at the Miramar warehouse to move the *Delgado* boxes in two weeks. *See* Email, 11/7/16.

15. On November 9, 2016, Ms. Arteaga-Gomez again asked if the *GMBH* boxes could be moved to the off-site storage facility currently housing the *Delgado* boxes to make room for the *Delgado* boxes in the Miramar warehouse. *See* Email, 11/9/16. Mr. Bradylyons responded: "I'm afraid we can't switch the boxes for you." *See* Email 11/9/16.

16. On November 17, 2016, Ms. Arteaga-Gomez again emailed Ms. Young and Mr. Bradylyons: ". . . Any news on when the boxes will be moved to the main warehouse?" *See* Email, 11/17/16. On November 21, 2016, Mr. Bradylyons responded: "I don't have any news to report about the move; I hope to have some next week." *See* Email, 11/21/16.

^{2/} A short video of the area is being separately submitted to the Court in a "Notice of Filing."

17. After November 21, 2016, the Esformes Defense Team visited the off-site storage facility housing the *Delgado* boxes approximately five more times. On December 2, 2016, Ms. Arteaga-Gomez wrote Ms. Young and Mr. Bradylyons again, stating that the Esformes Defense Team would no longer be visiting the off-site storage facility to conduct discovery review.

After lengthy discussion this morning, our team of discovery reviewers will not be going to the Miramar Storage Unit today for the following reasons.

The storage area is unworkable: there is excessive dust and mold. Many members of the team are developing ongoing allergies from working there.

Yesterday, the contractor spoke with a member of the team and shared that the corporate management refused to replace moldy air conditioning pipes located on each floor. He was forced to use black spray paint to cover the mold. Team members had to cover up in an attempt to avoid the spray paint fumes just to access the restrooms....

Additionally, due to the limited space in the storage unit for the 1200+ boxes, they have been stacked so high that they are falling over, risking injuries to our team and also destroying the evidence. Our team members are in no position to be lifting bankers boxes weighing as much as 30-40 lbs, stacked 6-7 feet high.

. . . I know there is space available at the FBI warehouse. There is an enormous FBI warehouse two or three doors to the left of the main warehouse entrance that is practically empty and would be large enough to accommodate these boxes. Can you please ask the FBI to move the *Delgado* boxes into one of those rooms?

See Email, 12/2/16.

18. Because approximately 800 of these boxes were not labeled by the FBI, the Esformes Defense Team was in the process of developing a system to keep track of the unlabeled boxes that they had preliminarily reviewed and those boxes that needed a more in-depth review. A system was also being developed to keep track of boxes that were identified by the team as containing important records that needed to be scanned to further analyze as part of the defense of the case. A lengthy delay posed the potential to cause members of the Esformes Defense Team to lose track of where

they were in their review of the boxes. After the Esformes Defense Team discussed the issue, it was reluctantly decided that the team would move on to reviewing the *Morales* boxes while the FBI moved the *Delgado* boxes to the Miramar warehouse.

19. On December 14, 2016, Ms. Arteaga-Gomez wrote to Ms. Young and Mr. Bradylyons requesting access to the *Morales* boxes. In her email, Ms. Arteaga-Gomez again mentioned that there was plenty of room to store the *Delgado* boxes in the warehouse next door to the main FBI Miramar warehouse. *See* Email, 12/14/16.

20. On January 9, 2017, Ms. Arteaga-Gomez followed up with Ms. Young regarding the *Delgado* boxes: “could you please let me know if you have an update on when the Delgado boxes will be moved to the warehouse? Last time I spoke to Scott [Mitchell], he believed the Delgado boxes would be moved in early January.” *See* Email, 1/9/17. Ms. Young responded the following day: “We will let you know the status of the Delgado boxes....” *See* Email, 1/10/17.

21. In late March, Agent Mitchell notified a member of the Esformes Defense Team that the Delgado boxes were ready to be moved to the Miramar warehouse. Ms. Arteaga-Gomez emailed Agent Mitchell, and copied Ms. Young and Mr. Bradylyons, on April 5, 2017 to ask that he please notify her once the Delgado boxes are at the Miramar warehouse. *See* Email, 4/5/17. Ms. Arteaga-Gomez also asked Agent Mitchell whether a taint agent would be assigned to assist Esformes Defense Team members with their discovery review at the warehouse and whether the 800 unlabeled boxes would be labeled. *Id.* As of April 14, 2017, no one from the prosecution team has responded to Ms. Arteaga-Gomez’s email.

MEMORANDUM OF LAW

II. THE COURT SHOULD ORDER THE DOJ FRAUD DIVISION AND FBI TO ASSIGN A TRULY INDEPENDENT TAINT TEAM TO ASSIST IN THE DISCOVERY REVIEW PROCESS

The Court should require the DOJ Fraud Division to create a bona fide, truly independent Taint Team to oversee the discovery process and do so in a way where *no government agent is in a position to “monitor” what the Esformes Defense Team is viewing or discussing*. The Taint Team should be headed by one or more prosecutors outside of both the DOJ Fraud Division and the USAO, and the agents assisting the attorneys should be from outside the FBI Miami Field Office, and those agents should report *only* to the Taint prosecutors.

Having an FBI agent who has an interest in the outcome of the case present to “monitor” the Esformes Defense Team’s review of discovery not only decimates the work product privilege, it also violates Mr. Esformes’ Fifth and Sixth Amendment rights. The Prosecution Team cannot, as a constitutional matter, condition access to discovery on a defendant waiving the work product privilege. “The work product doctrine grants attorneys ‘a zone of privacy within which to prepare the client’s case and plan strategy, without undue interference.’” *United States v. Horn*, 811 F. Supp. 739, 745 (D.N.H. 1992) (citing *In re San Juan Dupont Plaza Hotel Fire Litig.*, 859 F. 2d 1007, 1014 (1st Cir. 1988)). Work product “deserves special protection” in a “criminal proceeding where important constitutional rights of due process under the Fifth Amendment and effective assistance of counsel under the Sixth Amendment are at stake, along with the liberty interests of the defendant[]” *Id.* (citing *United States v. Nobles*, 422 U.S. 225, 238 (1975)).

It is impossible to conduct discovery review under the “supervision” of law enforcement personnel who are deliberately placed in a position to “monitor” the document review and selection

process. The rooms where the FBI has had the Esformes Defense Team to work are all too small to do work without disclosing to “monitoring” agents the work being undertaken. Even the large conference room containing the GMBH boxes ends up being small due to the number of boxes crowding the area and the number of people working in the room. The presence of an agent to monitor the Esformes Defense Team is unnecessary and inappropriate. Courts have recognized that attorneys, as officers of the court, can be trusted to abide by the law and the rules that govern the profession. *See United States v. June*, 10-30021, 2011 WL 5330788, at *3 (D. Mass. Oct. 19, 2011) (finding that the presence of an agent while the defense reviews documents is unnecessary because “Defendant’s counsel is an officer of the court responsible herself for the integrity of the documents”) (citing *Geders v. United States*, 425 U.S. 80, 93 (1976) (Marshall, J., concurring) (“If our adversary system is to function according to design, we must assume that an attorney will observe his responsibilities to the legal system, as well as to his client.”) and *United States v. Allen*, 542 F.2d 630, 633 (1976) (“We think that all but very few lawyers take seriously their obligation as officers of the court and their proper role in the administration of justice.”). The Prosecution Team should be ordered to allow the Esformes Defense Team to review the discovery outside the presence of “monitoring” agents or, at the very least, outside the presence of anyone *remotely* connected to the Prosecution Team or their agencies.

The Prosecution Team should also be ordered to move the *Morales* boxes to a room at the warehouse where the Esformes Defense Team can conduct its review without having to request specific boxes from an agent. An attorney’s selection of records to prepare for trial is considered work product. *Horn*, 811 F. Supp. at 746; *see also June*, 2011 WL 5330788, at *2. By having to request specific boxes from a prosecution agent, the defense telegraphs to the agent what boxes the

defense deems important to the issues and to the overall defense of the case. “[T]he selection process itself reveals counsel’s mental impressions as to how evidence relates to issues and defenses in the litigation.” *Horn*, 811 F. Supp. at 746 (citing *Sporck v. Peil*, 759 F.2d 312, 315 (3d Cir. 1985)). If the Esformes Defense Team is forced to disclose to the Prosecution Team (or some close colleague dubbed as a “taint” agent) which boxes out of thousands the Esformes Defense Team deems important, it is necessarily revealing its mental impressions about the case. As the Court in *Sporck* explained: “In selecting and ordering a few documents out of thousands counsel could not help but reveal important aspects of his understanding of the case. Indeed, in a case such as this, involving extensive document discovery, the process of selection and distillation is often more critical than pure legal research.” *Sporck*, 759 F.2d at 316 (citing *James Julian, Inc. v. Raytheon Co.*, 93 F.R.D. 138, 144 (D. Del 1982)). The Esformes Defense Team should not be forced to disclose to a Prosecution Team agent which boxes, and thus which records, out of thousands it is focusing on in preparation for trial.

Due to the voluminous nature of the discovery at the warehouse, it is not feasible for members of the Esformes Defense Team to scan the records themselves at the warehouse. The Esformes Defense Team needs to send records from the warehouse to a company that can efficiently scan them without having the Prosecution Team keeping track of what is being copied. The court in *June* recognized that work product can be revealed during the process of copying when it ordered the government to allow the defense attorney to make copies with her own copier. *See June*, 2011 WL 5330788, at *3. The Prosecution Team has already allowed the Esformes Defense Team to bring its own scanner to the warehouse and the off-site storage facility. Although the Esformes Defense Team has scanned some records with a desktop scanner, too many other records need to be scanned

for the Esformes Defense Team to continue doing its own scanning in the warehouse with a desktop scanner. A commercial scanning service is necessary in order to scan the volume of materials at these facilities. The Court should therefore order the Taint Team to assign a neutral, independent member of an unrelated government agency as the contact person for the Esformes Defense Team's scanning company to make arrangements to pick up and return boxes to the warehouse. Additionally, only this Taint Team member should be allowed to return the boxes to the room where they are permanently stored. The Prosecution Team should also be ordered to refrain from accessing that room until the Esformes Defense Team has reviewed the boxes to make sure they are not being kept in the room in an order that identifies the boxes that were scanned.

II. THE DELGADO BOXES SHOULD BE MOVED TO THE MIRAMAR WAREHOUSE

The defense has waited at least five months for the FBI to move the *Delgado* boxes from the off-site storage unit to the Miramar warehouse. The off-site storage unit is not properly ventilated and is infested with mold, insects and filth. The Esformes Defense Team is essentially working in the hallway of a storage facility under poor lighting and unsanitary conditions. If the Court has any questions of why this request is reasonable, we welcome the Court to view the facility itself.

CONCLUSION

For the foregoing reasons, the Court should issue a protective order that requires the DOJ Fraud Division, the USAO, and the FBI to assign at least one attorney-prosecutor and one or more federal agents who *are not* members of the Fraud Division, the USAO or the Miami field office of the FBI and who have not previously had any role in this case whatsoever to assume custody and control over the boxes of records in *Delgado* located at the off-site storage facility and of all of the other discovery at the Miramar warehouse that is not turned over to a Special Master or Magistrate

Judge. The Court's protective order should also require the FBI to move the boxes of records seized in *United States v. Guillermo Delgado, et al.*, Case No. 14-CR-20359-JEM(s) from the FBI's off-site storage facility to the government-controlled warehouse in Miramar, Florida.

CERTIFICATION PURSUANT TO LOCAL RULE 88.9

Pursuant to the Local Rule 88.9, counsel have made a good faith effort to resolve the issues raised in the instant motion but as noted in the motion itself those efforts have been unsuccessful.

CERTIFICATE OF SERVICE

On April 14, 2017, this pleading was served on all counsel by CM/ECF.

Respectfully submitted,

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