

Memo

To: Readers of the Resources section of my web site

From: Michael A. Catalano, P.A.
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Re: Sandra Veiga Investigation

This is memo number 10. This PDF consists of 3 pages total.

This is what I am filing as discovery.

IN THE COUNTY COURT OF THE
11th JUDICIAL CIRCUIT IN AND
FOR MIAMI DADE COUNTY, FLORIDA

STATE OF FLORIDA,

CASE NO.: [REDACTED]

Plaintiff,

TRAFFIC DIVISION

vs.

DEFENDANT'S WITNESS LIST
AND DISCOVERY

[REDACTED]

Defendant.

_____ /

COMES NOW the Defendant, [REDACTED], by and through the undersigned attorney and files this, his/her discovery and witness list as follows:

a. Sandra Veiga (We are calling her to show a reasonable doubt about the reliability of the breath test evidence and will not vouch for her credibility or truthfulness in light of her termination from her job with FDLE)

Sandra Veiga, Former FDLE employee
C/o Law Offices of Richard Caldwell, P.A. (He will accept process for her)
Brickell Bay Club
2333 Brickell Avenue
Suite A-1
Miami, Florida 33129-2497

b. Laura Barfield
FDLE Alcohol Testing Program Director. Tallahassee, FL

c. Officer Kevin Millan, 002-0141
Miami Beach P.D.

d. Officer Kim Velazquez, 030-2959
Miami Dade P.D.

e. PSA Pablo Espinosa, 030-6416
Miami Dade P.D.

f. PSA Lazaro Ley, 030-6259
Miami Dade P.D.

We also have documents reference to Sandra Veiga and the investigation reference to her mishandling of breath test machines, which can be found at my website:

www.michaelacatalanopa.com

Go to the "Resources" section and all documents and clips of audio can be downloaded for free.

Our expert witness, Charles Smith will rely upon said documents when he renders his opinion in this matter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished to the State Attorney's Office, this 25th day of November, 2008.

Respectfully submitted:

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By: 

Michael A. Catalano, Esq.