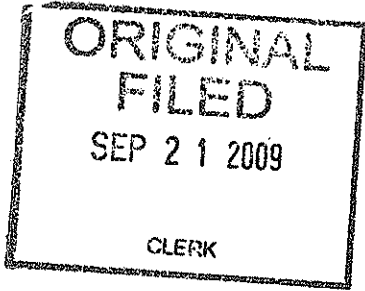


COPY

IN THE CIRCUIT COURT OF THE ELEVENTH
JUDICIAL CIRCUIT OF FLORIDA IN AND FOR
MIAMI-DADE COUNTY



CRIMINAL DIVISION

CASE NO.: F09019364
SECTION: F015
JUDGE: JOHN THORNTON

THE STATE OF FLORIDA,

Plaintiff,

v.

ANTOINE BOWENS,

Defendant.

_____ /

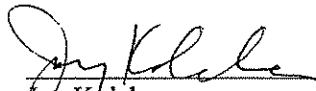
NOTICE OF FILING

Defendant, ANTOINE BOWENS, by and through the undersigned counsel, files the attached Supplemental Affidavit of Carlos J. Martinez.

I CERTIFY that a copy of this Notice of Filing has been hand-delivered to the Office of the State Attorney, 1350 NW 12 AVE, Miami FL 33136 , on September 21, 2009.

Respectfully submitted,

Carlos J. Martinez
Public Defender
Eleventh Judicial Circuit of Florida
1320 NW 14th Street
Miami, Florida 33125
305.545.1600

By: 
Jay Kolsky
Assistant Public Defender
Florida Bar No: 0163035

cc: State Attorney's Office
Clerk's Office

Chief Judge Joel H. Brown
Dade County Courthouse
73 West Flagler Street
Miami, Florida 33130
Via Hand Delivery

Administrative Judge Stanford Blake

Richard E. Gerstein Justice Building

1351 NW 12th Street

Miami, Florida 33125

Via Hand Delivery

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General Counsel

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Via U.S. Mail

Antoine Bowens

2225 W. 5th Avenue

Hialeah, Florida 33010

Via Hand Delivery & U.S. Mail

STATE OF FLORIDA)
)SS
COUNTY OF MIAMI-DADE)

SUPPLEMENTAL AFFIDAVIT OF CARLOS J. MARTINEZ

BEFORE ME, the undersigned authority, personally appeared Carlos J. Martinez, who after being duly sworn, deposes and says:

1. My name is Carlos J. Martinez. I am of the age of majority, and the following information is true and correct. The following information is based either on my personal knowledge or on records of the Office of the Public Defender for the Eleventh Judicial Circuit of Florida (“PD-11”) that were compiled by persons with personal knowledge, and made and kept in the regular course of PD-11’s business.

2. Since the filing of my original affidavit in support of Assistant Public Defender Jay Kolsky’s motion to withdraw on August 3, 2009, Mr. Kolsky’s pending caseload changed due, in large part, to a “plea blitz” in which many of his cases were closed. This supplemental affidavit is intended to amend the affidavit of August 3, 2009 to provide current caseload data from PDFACTS available as of the date of this supplemental affidavit and to supplement where the data was not previously included¹.

3. Mr. Kolsky’s caseload fluctuates due to new assignments, re-opened cases, clients who had alias capiases open being arrested and cases being disposed every day. PD-11 and the State Attorney’s Office agreed to use Mr. Kolsky’s caseload numbers as of August 28, 2009 for the purpose of Mr. Kolsky’s motion to withdraw from *State v. Bowens*, Case No. F09-019364.

¹ List of Cases Disposed by Plea During the Plea Blitz in Division F15 on August 10, 11 and 12, 2009, attached as Exhibit 1.

Mr. Kolsky's caseload as of September 17, 2009, is now up to 119². This fluctuation in caseload is inevitable, and real-time caseload analysis is not possible without a significant amount of resources being expended. As it is, the case-by-case, attorney-by attorney process for *moving to withdraw* based on conflict of interest due to excessive caseload is extremely time-consuming and burdensome.

4. As of August 28, 2009, PD-11's records show that Mr. Kolsky was responsible for 105 open, pending cases³.
 - a. Twenty-three are probation violation cases;
 - b. 81 are substantive (trial) cases, rather than violations of probation, and, one is set for restitution.
 - c. Trial cases account for 77% of Mr. Kolsky's caseload. The trial cases are comprised of
 - i. 60 third degree felonies,
 - ii. 15 second degree felonies,
 - iii. 6 first degree felonies.
 - d. Mr. Kolsky represents 84 clients; 39 of them are in custody; 45 are out of custody.
 - e. The State has listed 227 "A" witnesses (those that can be deposed without leave of court) in 74 trial cases. Mr. Kolsky has deposed 82 of the 227 "A" witnesses. There were 7 trial cases in which discovery was not provided.
 - f. He has done 82 depositions in 35 cases. He has not taken depositions in 57% of his trial cases.

² PD-11 Caseload Report of September 17, 2009, attached as Exhibit 2.

³ List of APD Jay Kolsky's Cases on August 28, 2009, attached as Exhibit 3.

5. Out of the 81 substantive trial cases pending on August 28, 2009, Mr. Kolsky had 24 trial cases in which his client was facing a minimum mandatory or enhanced sentence (e.g., PRRP, HVO, HO, 10/20/life). An enhanced case requires more time and attention than a non-enhanced case because the client is facing substantial time in prison. Considerable time and effort must be expended to investigate and develop mitigation for plea negotiations and for a potential sentencing hearing.

6. During FY 08-09, Mr. Kolsky was assigned to handle 593 new trial cases at or after arraignment. Of the 593, eight were inadvertently listed as new trial cases when they were in fact, VOP cases. That reduces the new trial case count for FY 08-09 to 585. Mr. Kolsky also handled 185 violation of probation cases. In addition, during FY 08-09, Mr. Kolsky closed 173 trial cases and 20 VOP cases that were not new case appointments during FY 08-09. This means that during FY 08-09, Mr. Kolsky was assigned to handle or disposed 758 trial cases and 205 VOP cases – a total of 964 cases.

7. In my professional judgment, Mr. Kolsky's workload is excessive and has created a conflict of interest among his clients as defined in the Rule of Professional Conduct 4-1.7. I approve of his motion to withdraw because his continued representation will result in violation of the Rules of Professional Conduct.

8. In my professional judgment, there are no resources anywhere in the office that can be shifted without doing more harm and reducing effectiveness⁴.

⁴ PD-11 typically assigns new assistant public defenders and attorney trainees to the county court, domestic violence and juvenile divisions, or felony ERU and intake. On average, each of the APDs and attorney trainees in the County Court (misdemeanor) division is currently responsible for 219 cases; in Juvenile, the average is 105 cases; in the Domestic Violence division, the average is 115 cases; in Felony ERU and intake, the average is 181 noncapital felony cases each.

9. Mr. Kolsky is the most experienced "C" felony attorney in any felony division. Moving a "C" felony attorney from another division into Division F15 would help Mr. Kolsky and Division F15, but it would create an equally excessive caseload in the other division where a less experienced attorney would be even more overwhelmed. The current caseload report for all "C" attorneys, plus the two felony trial attorneys who are in the two-person court handling a caseload of A, B, and C cases, (PD-11 "C" Attorney Weekly Audit) is attached to this affidavit as Exhibit 4.

10. I have reviewed and fully support the Motion to Withdraw and Declare Section 27.5303(1)(d)&(e), Florida Statutes, Unconstitutional filed by Assistant Public Defender Jay Kolsky in this case.

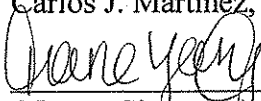
11. There is no viable alternative to withdrawal from Mr. Bowens' case that would remedy Mr. Kolsky's conflict of interest with Mr. Bowens and his other clients caused by excessive caseload. Given PD-11's current financial situation, no reasonable management measures can ensure that Mr. Kolsky can meet the constitutional and ethical obligations owed to Mr. Bowens without being allowed to withdraw from Mr. Bowens' case.

FURTHER AFFIANT SAYETH NAUGHT



CARLOS J. MARTINEZ
Public Defender,
Eleventh Judicial Circuit of Florida

The foregoing instrument was acknowledged before me this 18th day of September, 2009, by Carlos J. Martinez, who is personally known to me and who did take an oath.


(Notary Signature) Diane Yanez

NOTARY PUBLIC-STATE OF FLORIDA
Diane Yanez
Commission # DE536118
Expires: APR 02, 2010
Bonded Third Atlantic Surety Co., Inc.

EXHIBIT 1

**List of Cases Disposed by Plea During the Plea Blitz in
Division F15 on August 10, 11 and 12, 2009**

Case No	CLIENT LAST	CLIENT FIRST	VOP
F08032256	BASS	KEVIN	
F09016726	BLACK	ANTHONY	
F09020619	BLACK	ANTHONY	
F09009377	BOBBITT	ERIC	
F09006010	DANILES	JAMES	
F08039853	DAVIS	ERRICK	
F09017259	DAVIS	ERRICK	
F09009657	DIXON	RICKY	
F09002367B	DIXON	RICKEY	YES
F09014621	DOBSON	LEVON	
F09014903	ELEBY	ROLAND	
F09021430	FRANCOIS	SYLJACQUES	
F09015083	HABERSHAM	TAVORIS	
F09016505	HERNANDEZ	VICTOR	
F09019498	HERNANDEZ	RAFAEL	
F09014683	IVORY	ALLEN	
F09017848	JONES	MARY	
F09013240	KHAN	OSIE	
F09022626	KHAN	OSIE	
F09023801	LARRALDE	JOHN	
F08000522	LAWSON	LEROY	YES
F09020493	MACKENDY	CHARLES	
F09022755	MARTINEZ	GERALDO	
F09016513	MCALLISTER	ISAAC	
F09009661	MEDINA	RICHARD	
F08022168	MILLINGS	JAMES	
F09021046	MOORE	ABRAHAM	
F07001248A	ORELLY	JORGE LUIS	YES
F07003054	ORELLY	JORGE	YES
F07003050	ORELLY	JORGE	YES
F07003047	ORELLY	JORGE	YES
F07003049	ORELLY	JORGE	YES
F07003053	ORELLY	JORGE	YES
F07007267	ORELLY	JORGE	YES
F09018784	O'RELLY	DANILO	
F09012476	PERDOMO	RAMON	
F09020487	PEREZ	JESUS	
F09012173	RAMIREZ	JOSEPH	
F09024021	RAMIREZ	MARIA	
F09019688	RIVERA	ERNESTO	
F09012818	ROBERTS	SIMONE	
F09008283	RODRIGUEZ	JOSE	
F08022885	ROSA TORRES	LUZ	YES

F08040494	ROSADO	CAROL	YES
F09011847	RUIZ	EDDY	
F09020707	SERRANO	RAFAEL	
F09015833	SHIGGS	ALVIN	
F09022744	STANLEY	RICHARD	
F09022155	SUAREZ	JORGE	
F09023176	SUAREZ	JORGE	
F09002619	TATE	EUGENE	
F09010571	TORRES	VANESSA	
F09021850C	VALDES	PEDRO	
F09013438B	VALDES	PEDRO	YES
F09011685	VALERO	EDUARDO	
F08039624	WEISSVERT	SEBASTIAN	
F09010482	WILLIAMS	JONICE	
F09010561	WILLIAMS	RODNEY	
F09017939	WILLIAMS	RODNEY	
F06008347	WILLIAMS	TIFFNEY	YES
F09010039	YOUNG	RICHARD	
F09020132	ZARAGOSA	JORGE	

EXHIBIT 2

Office Wide Attorney/Attorney Trainees Open Cases Report

PDO Case#	Division	Initials and Name			
COUNTY	M005	ACR	ALLANA ROBINSON	102	RICHARD DE MARIA JC
COUNTY	CE	AXH	ANDREAS HEISS	244	RICHARD DE MARIA CE
COUNTY	CH	ACC	ANYA CINTRON	285	RICHARD DE MARIA CH
COUNTY	F051	ABC	AUDRA COHEN	33	PAUL KAMINSKY F051
COUNTY	CG	BAK	BRIAN KIRLEW	244	RICHARD DE MARIA CG
COUNTY	CC	BMN	BRITTANY NICOLLI	494	RICHARD DE MARIA CC
COUNTY	CE	CJM	CARL MECKE	178	RICHARD DE MARIA CE
COUNTY	CH	CDG	CARLOS GRANDE	303	RICHARD DE MARIA CH
COUNTY	JA	CMB	CLAUDIA BIZUNE	12	RICHARD DE MARIA ALL
COUNTY	JC	DRR	DAMIAN RASMUSSEN	84	RICHARD DE MARIA DJ
COUNTY	CG	DIM	DIONNE MCDONALD-JOSEPHS	232	RICHARD DE MARIA CG
COUNTY	JC	HLW	HEATHER WARD	5	RICHARD DE MARIA DJ
COUNTY	CD	JRB	JACKLYN BOTTS	230	RICHARD DE MARIA CD
COUNTY	CF	JPO	JAZMINE PRESTON-O'NEILL	350	RICHARD DE MARIA CF
COUNTY	CD	KAE	KATHERINE ELSNER	206	RICHARD DE MARIA CD
COUNTY	CB	LMC	LAKIESHA CANNON	465	RICHARD DE MARIA CB
COUNTY	CA	MZL	MARLA LEVENSTEIN	280	RICHARD DE MARIA CA
COUNTY	M003	MKM	MICHAEL MAYER	78	RICHARD DE MARIA JC
COUNTY	B00	RMD	RICHARD DE MARIA	27	RORY STEIN ALL
COUNTY	M087	RZU	ROY UGARTE	1	IVONNE CUESTA M087
COUNTY	JC	RKS	RYAN SHANOVICH	70	RICHARD DE MARIA DJ
COUNTY	M007	SZM	SARA MARKEN	100	RICHARD DE MARIA JC
			COUNTY	4023	
DOMESTIC	M089	AAP	AIMONE PASQUALIN	135	IVONNE CUESTA M089
DOMESTIC	M088	CXJ	CHANEL JEFFERSON	131	IVONNE CUESTA M088
DOMESTIC	M087	CZD	COLETTE DRIMMER	133	IVONNE CUESTA M087
DOMESTIC	M088	DBM	DAWN MACREADY	132	IVONNE CUESTA M088
DOMESTIC	M089	EAW	EUGENE WHITTON	114	IVONNE CUESTA M089
DOMESTIC	DCC	IXC	IVONNE CUESTA	17	RICHARD DE MARIA ALL
DOMESTIC	M087	RZU	ROY UGARTE	142	IVONNE CUESTA M087
			DOMESTIC	804	
ERU	F020	BJL	BENJAMIN LUCAS	165	CONNIE ALTER ERU
ERU	F017	CHA	CONNIE ALTER	161	GUY ROBINSON ERU
ERU	F051	EXS	ELLIOTT SNYDER	128	CONNIE ALTER ERU
ERU	F071	JJI	JOSEPH IMPERATO	1	CARL YOUNG F006
ERU	F070	JRF	JULIA IZQUIERDO	152	CONNIE ALTER ERU
ERU	F071	KZS	KAREN HILEMAN	134	CONNIE ALTER ERU
ERU	F016	MAE	MICHELLE ESTLUND	126	CONNIE ALTER ERU
ERU	F015	MAP	MICHELLE PRESCOTT	166	CONNIE ALTER

Office Wide Attorney/Attorney Trainees Open Cases Report

09/17/2009 08:41:12

PDO Case#	Division	Initials and Name				
ERU	F019	RBK	RACHEL KUHL	141	CONNIE ALTER	ERU
				ERU	1174	
FELONY	F010			1		
FELONY	F071	AQS	ALEX STERN	37	MICHAEL MELINEK	F019
FELONY	F070	AJW	ALFRED WILLIAMS	49	GUY ROBINSON	ALL
FELONY	F012	AXF	ALYSON FALIK	85	OLIVER MORALES	F012
FELONY	F001	ALW	AMY WEBER	3	BETH WEITZNER	
FELONY	F051	ABC	AUDRA COHEN	892	PAUL KAMINSKY	F051
FELONY	F008	BPS	BRENDAN SMITH	104	CARL YOUNG	F006
FELONY	F071	BJM	BRIAN MCCORMACK	44	GUY ROBINSON	F021
FELONY	F071	BLM	BRIAN MCDONALD	58	STEPHEN KRAMER	F007
FELONY	F020	CAL	CARIN LEVINE	52	LOURDES SIMON	F020
FELONY	F018	CDY	CARL YOUNG	25	GUY ROBINSON	M/S
FELONY	F071	CAS	CAROL FERRERO	30	KEVIN HELLMANN	F017
FELONY	F018	CCM	CHRISTINE MENEDIS	142	OLIVER MORALES	F018
FELONY	F001	RMC	CULLEN RYAN	94	KEVIN HELLMANN	F001
FELONY	F012	DXT	DANIEL TIBBITT	59	OLIVER MORALES	F012
FELONY	F006	DLK	DAVID KRYPEL	102	CARL YOUNG	F006
FELONY	F014	DIS	DAVID SISSELMAN	60	MICHAEL MELINEK	F014
FELONY	F003	DFB	DEBORAH BOGOSLAW	56	MICHAEL MELINEK	F003
FELONY	F020	EBG	EDITH GEORGI	15	RORY STEIN	CLU
FELONY	F001	EXP	EDUARDO PEREIRA	46	KEVIN HELLMANN	F001
FELONY	F013	ENB	ERIC BERNSTEIN	83	CARL YOUNG	F013
FELONY	F007	ELB	ERICA GERSTIN	56	STEPHEN KRAMER	F007
FELONY	F021	GAL	GALE LEWIS	47	KEVIN HELLMANN	ALL
FELONY	F018	GTT	GREGG TOUNG	13	PAUL KAMINSKY	ICC
FELONY	F021	GDR	GUY ROBINSON	2	RORY STEIN	
FELONY	F017	HMS	HERBERT SMITH	44	STEPHEN KRAMER	MAJ
FELONY	F015	JMK	JAY KOLSKY	119	LOURDES SIMON	F015
FELONY	F011	JCW	JENNIE WINGAD	96	STEPHEN KRAMER	F011
FELONY	F071	JBP	JENNIFER PARRADO	32	STEPHEN KRAMER	F004
FELONY	F021	JKW	JENNIFER WORKMAN	126	GUY ROBINSON	F021
FELONY	F001	JGI	JOANNA INGALLS	123	KEVIN HELLMANN	F001
FELONY	F016	JYD	JOANNE DIEZ	73	STEPHEN KRAMER	F016
FELONY	F009	JYM	JOHN MIQUEL	45	KEVIN HELLMANN	F009
FELONY	F071	JLV	JORGE VIERA	28	LOURDES SIMON	F015
FELONY	F071	JJI	JOSEPH IMPERATO	62	CARL YOUNG	F006
FELONY	F017	JMC	JUDY CULLINAN	63	KEVIN HELLMANN	F017
FELONY	F061	KNB	KAREN BAEZ	64	OLIVER MORALES	F018
FELONY	F016	KBO	KAREN O'CONNOR	26	STEPHEN KRAMER	F016
FELONY	F016	KJS	KATHRYN STROBACH	61	STEPHEN KRAMER	F011

Office Wide Attorney/Attorney Trainees Open Cases Report

09/17/2009 08:41:12

PDO Case#	Division	Initials and Name				
FELONY	F071	KCF	KELLY FOSTER	36	KEVIN HELLMANN	F001
FELONY	F019	KJH	KEVIN HELLMANN	33	GUY ROBINSON	
FELONY	F018	LRR	LAURA ROJAS	159	PAUL KAMINSKY	ALL
FELONY	F020	LYS	LAZARO SANCHEZ	80	LOURDES SIMON	F020
FELONY	F014	LCB	LIESBETH BOOTS	2	EDITH GEORGI	CLU
FELONY	F010	LFL	LISA LEWIS	96	LOURDES SIMON	F010
FELONY	F020	LDS	LOURDES SIMON	21	GUY ROBINSON	M/S
FELONY	F071	LEF	LUCIAN FERSTER	62	MICHAEL MELINEK	F014
FELONY	F071	LXD	LUCRECIA DIAZ HUDSON	78	CARL YOUNG	F006
FELONY	F061	LUZ	LUZ BORGES	77	OLIVER MORALES	F012
FELONY	F021	MMO	MADLINE ACOSTA	1	RORY STEIN	
FELONY	F015	MIA	MAGGIE ARIAS	54	LOURDES SIMON	F015
FELONY	F071	MGM	MARC MORRIS	20	KEVIN HELLMANN	F009
FELONY	F002	MXT	MARCUS TAN	76	OLIVER MORALES	F002
FELONY	F071	MNB	MELISSA BEIGEL	33	OLIVER MORALES	F018
FELONY	F071	MZM	MICHAEL MELINEK	41	GUY ROBINSON	MCA
FELONY	F006	MAE	MICHELLE ESTLUND	2	CONNIE ALTER	ERU
FELONY	F051	MQH	MICHELLE HOROVITZ	130	MICHAEL MELINEK	F003
FELONY	F071	MIL	MICHELLE LONDON	175	PAUL KAMINSKY	ALL
FELONY	F014	MJR	MICHELLE ROSENGARTEN	125	MICHAEL MELINEK	F014
FELONY	F071	MJW	MITCHELL WALLICK	34	OLIVER MORALES	F002
FELONY	F071	MWR	MYLES RAUCHER	44	STEPHEN KRAMER	F016
FELONY	J013	NRS	NATAHLY SOLER	80	OLIVER MORALES	F002
FELONY	F006	NMN	NICOLE NOEL	85	CARL YOUNG	F006
FELONY	F013	ODM	ODIA BURDICK	65	CARL YOUNG	F013
FELONY	F018	OMM	OLIVER MORALES	21	GUY ROBINSON	
FELONY	F071	PJC	PABLO CASASNOVAS	53	CARL YOUNG	F008
FELONY	F061	PEG	PATRICIA GUERRERO	67	KEVIN HELLMANN	F017
FELONY	F019	PJN	PATRICK NALLY	9	EDITH GEORGI	CLU
FELONY	F055	PLK	PAUL KAMINSKY	54	RORY STEIN	ALL
FELONY	F021	PMO	PENNY KIM	26	PAUL KAMINSKY	ICC
FELONY	F071	PDF	PETER FERRERO	76	GUY ROBINSON	MCA
FELONY	F005	PXL	PREETI LALA	98	CARL YOUNG	F005
FELONY	F071	RDP	RANDALL PETRE	65	STEPHEN KRAMER	F011
FELONY	F071	RAC	REBECCA COX	161	PAUL KAMINSKY	
FELONY	F007	RYM	RITA MAVUNDA	103	STEPHEN KRAMER	F007
FELONY	F004	RCA	ROBERT AARON	52	STEPHEN KRAMER	F004
FELONY	F071	RLW	ROBERT L. WHITE III	67	CARL YOUNG	F005
FELONY	F004	RJM	ROBERT MCCAFFERY JR	105	STEPHEN KRAMER	F004
FELONY	F019	SFY	SARA YOUSUF	67	MICHAEL MELINEK	F019
FELONY	F008	SYR	SHANESE RIVERA	103	CARL YOUNG	F008

Office Wide Attorney/Attorney Trainees Open Cases Report

PDO Case#	Division	Initials and Name			
FELONY	F016	SRM STACY MARCZAK	71	STEPHEN KRAMER	F016
FELONY	F017	SLK STEPHEN KRAMER	22	GUY ROBINSON	MCA
FELONY	F071	SET STEPHEN TAYLOR	39	CARL YOUNG	F013
FELONY	F071	SXB STEVEN BUSTAMANTE	44	OLIVER MORALES	F012
FELONY	F071	SLL STEVEN LEVINE	37	GUY ROBINSON	F021
FELONY	F018	SNY STEVEN YERMISH	4	EDITH GEORGI	CLU
FELONY	F002	SZV SUZANNE VILLANO	49	OLIVER MORALES	F002
FELONY	F020	TIG TAMARA GRAY	79	KEVIN HELLMANN	ALL
FELONY	F019	TNK TARA KAWASS	139	MICHAEL MELINEK	F019
FELONY	F071	TLO TARA O'BRIEN	65	MICHAEL MELINEK	F003
FELONY	F005	TXS TARIN SMITHLINE	54	CARL YOUNG	F005
FELONY	F013	TAK THOMAS KROEGER	92	CARL YOUNG	F013
FELONY	F009	TMB TRISTIA BAUMAN	55	KEVIN HELLMANN	F009
FELONY	F017	WLR WALLACE RICHARDSON	110	KEVIN HELLMANN	F017
FELONY	F070	WSS WARREN SCHWARTZ	96	LOURDES SIMON	F010
FELONY	F005	WLB WENDY BURRELL	105	CARL YOUNG	F005
FELONY	F020	WJS WILLIAM SUROWIEC	38	LOURDES SIMON	F020
			FELONY	6952	
INTAKE	F001	RMC CULLEN RYAN	1	KEVIN HELLMANN	F001
INTAKE	F021	CDW DAVID WEED	332	GUY ROBINSON	ERU
INTAKE	F051	EBR ERICA ROBY	167	C. DAVID WEED	
INTAKE	F017	SYL STEPHANIE LANGER	138	C. DAVID WEED	ERU
			INTAKE	638	
JUVENILE	J014	BDB BEAU BLACKLEY	128	MARIE OSBORNE	J014
JUVENILE	J013	CQB CHRISTOPHER BROCHYUS	86	MARIE OSBORNE	J013
JUVENILE	J012	DLF DONNA FIELDS	128	MARIE OSBORNE	J012
JUVENILE	J013	GMG GABRIELLE GREEN	115	MARIE OSBORNE	J013
JUVENILE	J014	GCP GEORGE C. PALAIDIS	94	MARIE OSBORNE	J011
JUVENILE	J013	JZJ JEFF JAMES	54	MARIE OSBORNE	J013
JUVENILE	J011	JQG JESSICA GARRITY	157	MARIE OSBORNE	J011
JUVENILE	J014	JZB JOANN BARAN	88	MARIE OSBORNE	ALL
JUVENILE	J014	KLK KELLY KOBIELUSH	150	MARIE OSBORNE	J014
JUVENILE	J048	LRM LILLIAN MARTIN	87	MARIE OSBORNE	ALL
JUVENILE	J012	LCE LISA-MARIE ELLIOTT	115	MARIE OSBORNE	J012
JUVENILE	J014	LBS LUISA SANTOS	106	MARIE OSBORNE	J014
JUVENILE	J014	MDO MARIE OSBORNE	24	RORY STEIN	
JUVENILE	J014	MCA MARJORIE ALEXIS	30	MARIE OSBORNE	
JUVENILE	J012	MUM MATTHEW MCELLIGOTT	86	MARIE OSBORNE	J012
JUVENILE	J013	MBB MICHAEL BOSTICK	159	MARIE OSBORNE	J013
JUVENILE	J011	MFH MIRIAM HASKELL	129	MARIE OSBORNE	J011
JUVENILE	J014	TRG RENEE GORDON	14	MARIE OSBORNE	

Office Wide Attorney/Attorney Trainees Open Cases Report

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PDO Case#	Division	Initials and Name				
JUVENILE	J012	SCK	STEPHANIE KAPLAN	92	MARIE OSBORNE	J012
JUVENILE	J013	SYS	SUSAN SPRUCE	64	MARIE OSBORNE	ALL
JUVENILE	J011	YKH	YACENDA HUDSON	171	MARIE OSBORNE	J011
JUVENILE	J014	YKW	YAMINAH K. WILLIAMS	123	MARIE OSBORNE	J014
			JUVENILE	2200		

Total Count = 15791

EXHIBIT 3

List of APD Jay Kolsky's Cases as of 08/28/2009

CASE NO	CLIENT LAST	CLIENT FIRST	In-Custody	VOP
F09014709	AGUIAR	GIORDANO	YES	NO
F08030632	AGUIAR	JORDANO	YES	YES
F09020809A	AGUIRRE	SARA	NO	NO
F09024948	AIKMAN	SEAN	YES	NO
F02032166	BARBARY	DEANGELO	NO	YES
F09023123	BAZA	ISIDRO	YES	NO
F09006446	BEDARD	GARY	YES	YES
F09008383	BEDARD	GARY	YES	YES
F08019920	BELIZAIRE	MARC	NO	NO
F09024912A	BELLEVUE	WILLIE	YES	NO
F09025121	BELLEVUE	RIVERO	YES	NO
F09025120	BELLEVUE	RIVERO	YES	NO
F09016726	BLACK	ANTHONY	YES	YES
F09020619	BLACK	ANTHONY	YES	YES
F09019364	BOWENS	ANTOINE	NO	NO
F08018049B	BROWN	DAVID	YES	NO
F08016845	BROWN	TORRENCE	NO	NO
F06028002	BROWN	DAVID	YES	YES
F07012999	BURROGGHS	TAZE	NO	NO
F08038386	BYRD	RICHARD	NO	NO
F09021956	CABRERA	ARNOLDO	NO	NO
F09024019	CALHOUN	DERRICK	NO	NO
F09019260	CALZADILLA	EVER	YES	NO
F08047140	CAPERS	VINCENT	YES	NO
F08029592	CAPERS	VINCENT	YES	NO
F09012531	CAPOTE	RAMON	NO	NO
F09024757	CASTRO ARROYO	ONELIO	NO	NO
F09009825	CASYO	WILBERT	NO	NO
F07032292	CEPEDA	NELSON	YES	NO
F09019396	CEPHUS	TIMOTHY	YES	NO
F08015634	CERRATO	TERESA	YES	YES
F09024720	CHARLES	JACK	NO	NO
F07039364	CHRISTOPHE	JOHN	YES	YES
F07027848	CHRISTOPHE	MONDY	NO	YES
F09015019	COLEMAN-PETERS	JANICE	NO	NO
F09027532	CUENCA	RAUL	YES	NO
F09025717	CUNNINGHAM	HENRY	NO	NO
F09022694	DOWDY	BRANDON	YES	NO
F09006621B	DOWDY	BRANDON	YES	NO
F09024802	ESPINOSA	MAGDALINE	NO	NO
F09014403	ESPINOSA	FRANCISCO	NO	NO
F08042212	ESTEVEZ	LUIS	NO	NO
F07038190	EVERETT	RODGERICK	YES	YES
F06014823	FERNANDEZ	WILFREDO	YES	YES

F09023014	FILSAME	PATRICK	YES	NO
F09020593	FISHER	BENJAMIN	YES	NO
F08005802B	FUNDORA	WILLIAM	NO	YES
F09023883A	FUSSELL	ANTWAN	NO	NO
F06010578	GARRIDO	OMAR	YES	YES
F05031738	GARRIDO	OMAR	YES	YES
F09012039	GRACIA	JORGE	NO	NO
F09024381	GREENE	BRIAN	YES	NO
F09020905	GREENE	BRIAN	YES	NO
F09020781	HERNANDEZ	HUMBERTO	NO	NO
F09015676	HILLS	BERNARD	YES	NO
F09015675	HILLS	BERNARD	YES	NO
F09015677	HILLS	BERNARD	YES	NO
F06035170	HILLS	BERNARD	YES	YES
F09023742	HORTA	EDY	NO	NO
F09008091	JEAN	EMMANUEL	YES	NO
F09020125	JOHNSON	CLEVELAND	NO	NO
F06016693	LAWSON	TAVARES	YES	YES
F08010020A	LEBOLO	JAIRO	NO	NO
F09015330	LONDONO	ALEX	NO	NO
F09022403	LOPEZ	ANTONIO	NO	NO
F09023449	MANN	RASAUL	YES	NO
F09007933	MCCOY	LANCE	NO	NO
F08047302B	MCCULLER	CHRISTOPHER	YES	YES
F09024121A	MOLINA	RONALD	YES	NO
F07001098C	MONTES	MICHELLE	YES	YES
F09019635	NAVARRO	JOSE	NO	NO
F09013454	PEREZ	GLENDA	NO	NO
F06036022	PEREZ	JOSE M	YES	YES
F09013408	PRESTON	CARENTHIA	NO	NO
F09016852	PREVAL	SAMUEL	NO	NO
F09013238	PREVAL	SAMUEL	NO	NO
F07045580B	QUIALA	RAMON	NO	NO
F09012173	RAMIREZ	JOSEPH	NO	NO
F07031862	RAMOS	WILFREDO	YES	NO
F09018556	RIVERA NIEVES	SHERYLN	NO	NO
F09017876	ROBERTSON	RAY	YES	NO
F09017874	ROBERTSON	RAY	YES	NO
F09017825	ROBERTSON	RAY	YES	NO
F09017824	ROBERTSON	RAY	YES	NO
F09021812	RODRIGUEZ	ORLANDO	NO	NO
F07034803	RODRIGUEZ	ALFREDO	NO	NO
F09011508B	SABB	WILLIE	NO	NO
F09016565	SANCHEZ	LUIS	YES	NO
F09013590	SANTIAGO	ANTHONY	YES	NO
F09019845	SANTIAGO	ANTHONY	YES	NO
F09020913	SANTOS-FERRO	LUIS	NO	NO

F09022065	SHAEFFER	DEREK	YES	NO
F08031352	SOLORZANO	CRISTOPHER	YES	YES
F09005305	SOLORZANO	CHRISTOPHER	YES	YES
F92023332	STRAUGHTER	CHEEKEELA	NO	NO
F09014090	TASSY	ISRAEL	NO	NO
F09013434	TORRES	IVAN	NO	NO
F04018598	TRILLO	DANIEL	YES	YES
F09011711	VALIENTE	TOMAS	NO	NO
F09022916A	VALINO	HUGO	YES	NO
F09010585	WADE	LARRY	NO	NO
F09016652	WALKER	CHEVAS	YES	NO
F09025165	WASHINGTON	WILLIE	NO	NO
F09007374	ZIMMERMAN	NATHAN	YES	NO
F09007375	ZIMMERMAN	NATHAN	YES	NO

EXHIBIT 4

PD-11 "C" Attorney Weekly Audit

PDO Case#	Division	APD Initials and Name	Total Open Cases	Supervising Attorney	"Primary Division"
FELONY	F012	AXF ALYSON FALIK	85	OLIVER MORALES	F012
FELONY	F018	CCM CHRISTINE MENEDIS	142	OLIVER MORALES	F018
FELONY	F001	RMC CULLEN RYAN	94	KEVIN HELLMANN	F001
FELONY	F006	DLK DAVID KRYPEL	102	CARL YOUNG	F006
FELONY	F013	ENB ERIC BERNSTEIN	83	CARL YOUNG	F013
FELONY	F015	JMK JAY KOLSKY	119	LOURDES SIMON	F015
FELONY	F011	JCW JENNIE WINGAD	96	STEPHEN KRAMER	F011
FELONY	F021	JKW JENNIFER WORKMAN	126	GUY ROBINSON	F021
FELONY	F001	JGI JOANNA INGALLS	123	KEVIN HELLMANN	F001
FELONY	F016	JYD JOANNE DIEZ	73	STEPHEN KRAMER	F016
FELONY	F020	LYS LAZARO SANCHEZ	80	LOURDES SIMON	F020
FELONY	F010	LFL LISA LEWIS	96	LOURDES SIMON	F010
FELONY	F061	LUZ LUZ BORGES	77	OLIVER MORALES	F012
FELONY	F002	MXT MARCUS TAN	76	OLIVER MORALES	F002
FELONY	F051	MQH MICHELLE HOROVITZ	130	MICHAEL MELINEK	F003
FELONY	F014	MJR MICHELLE ROSENGARTEN	125	MICHAEL MELINEK	F014
FELONY	J013	NRS NATAHLY SOLER	80	OLIVER MORALES	F002
FELONY	F006	NMN NICOLE NOEL	85	CARL YOUNG	F006
FELONY	F061	PEG PATRICIA GUERRERO	67	KEVIN HELLMANN	F017
FELONY	F005	PXL PREETI LALA	98	CARL YOUNG	F005
FELONY	F007	RYM RITA MAVUNDA	103	STEPHEN KRAMER	F007
FELONY	F004	RJM ROBERT MCCAFFERY JR	105	STEPHEN KRAMER	F004
FELONY	F008	SYR SHANESE RIVERA	103	CARL YOUNG	F008
FELONY	F016	SRM STACY MARCZAK	71	STEPHEN KRAMER	F016
FELONY	F019	TNK TARA KAWASS	139	MICHAEL MELINEK	F019
FELONY	F013	TAK THOMAS KROEGER	92	CARL YOUNG	F013
FELONY	F009	TMB TRISTIA BAUMAN	55	KEVIN HELLMANN	F009
FELONY	F017	WLR WALLACE RICHARDSON	110	KEVIN HELLMANN	F017
FELONY	F070	WSS WARREN SCHWARTZ	96	LOURDES SIMON	F010
FELONY	F005	WLB WENDY BURRELL	105	CARL YOUNG	F005

FELONY 2936

Total Count = 2936