

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PASCO COUNTY, FLORIDA  
CIVIL DIVISION

OFFICE OF THE ATTORNEY GENERAL,  
DEPARTMENT OF LEGAL AFFAIRS,  
STATE OF FLORIDA,

Plaintiff,

Case No.: 51-2010-CA-2912-WS/G

v.

BOTFLY, LLC, DAVID R. LEWALSKI,  
JON J. HAMMILL, and JON J. HAMMILL, P.A.

Defendants.

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**RECEIVER'S NOTICE OF INTENT TO OFFER  
EVIDENCE PURSUANT TO SECTION 90.803 (6)**

Michael E. Moecker, as Receiver of Botfly L.L.C., David R. Lewalski, and Jon J. Hammill and all other entities operated, controlled or otherwise associated with the Defendants' activities (the "**Receiver**"), by and through undersigned counsel, gives notice of his intent to offer into evidence the following business records:

1. Bank of America records for Botfly account numbers \*\*\*\*\*5586; \*\*\*\*\*5540; \*\*\*\*\*7434; and \*\*\*\*\*7098.
2. Bank of America records for Hammill account numbers \*\*\*\*\*5458 and \*\*\*\*\*2853.
3. Wachovia records for Botfly account number \*\*\*\*\*6928.
4. Wachovia records for Hammill account number \*\*\*\*\*2128.
5. Wachovia records for Hammill, P.A., account number \*\*\*\*\*5195.
6. Sun Toyota records regarding purchase of 2006 Lexus by Hammill in May 2009.
7. Bogue Sound Boat Company records regarding purchase of boat and motors by Hammill in July 2009.

8. Fifth Third Bank records for Botfly account no. \*\*\*\*\*2010.
9. Florida Citizens Bank records for Botfly account no. \*\*\*\*\*4192.
10. Vystar records for Botfly account numbers \*\*\*\*\*1392 and \*\*\*\*\*5861.
11. Deutsche Bank records for account numbers \*\*\*\*\*3108, \*\*\*\*\*3177, \*\*\*\*\*1171, and \*\*\*\*\*2962.
12. PFG Best Financial Group account records for Botfly and Lewalski accounts.
13. IFX Markets account records for Botfly and Lewalski accounts.

Dated: July 20, 2011

BUSH, ROSS, P.A.  
Post Office Box 3913  
Tampa, FL 33601-3913  
(813) 224-9255  
(813) 223-9620 (telecopy)  
*Counsel for the Receiver*

BY: Karen Cox  
Jeffrey W. Warren, Esquire  
Florida Bar No. 150024  
Karen Cox, Esquire  
Florida Bar No. 456667

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Receiver's Notice of Intent to Offer Evidence Pursuant to Section 90.803 (6) has been delivered this 20<sup>th</sup> day of July, 2011 to the below named parties in the manner indicated below:

Via E-Mail and U.S. Mail

Gregory S. Slemp, Esq.  
R. Scott Palmer, Esq.  
Nicholas J. Weilhammer, Esq.  
PL-01: The Capitol  
Tallahassee, Florida 32399-1050

Via U.S. Mail

Inmate David Lewalski  
Pinellas County Jail  
Cell Location/Status: CEN-6C1-UN01-08-003  
14400 49th St N  
Clearwater, FL 33762

Via E-Mail and U.S. Mail

Jon J. Hammill  
6232 Fifth Avenue North  
St. Petersburg, FL 33710

Via E-Mail and U.S. Mail

Steve D. Tran, Esq.  
2285 First Avenue North, Suite A  
St. Petersburg, FL 33713

Via E-Mail and U.S. Mail

Gabriel Mazzeo, Esquire  
285 Ocklawaha Circle  
Quincy FL 32351

*Karen Cox*  
\_\_\_\_\_  
Karen Cox, Esq.