

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT  
IN AND FOR ALACHUA COUNTY, FLORIDA

DW ASHTON CATERY, INC.,

Plaintiff,

vs.

ALACHUA TODAY, INC.,

Defendant.

CASE NO.: 01-2022-CA-2631

DIVISION: "J"

**REQUEST FOR COMPULSORY JUDICIAL NOTICE PURSUANT TO  
FLORIDA STATUTES § 90.203**

Plaintiff, DW ASHTON CATERY, INC., by and through its undersigned attorneys,  
and pursuant to Florida Statutes § 90.203, requests this Honorable Court to take Judicial  
Notice of the following matters set forth in Florida Statutes § 90.202 (5), to-wit:

Memorandum, Office of Inspector General, dated March 28, 2025, Case File 2024-  
INQ-021, subject: Attorney Linda Rice Chapman, Complaint. A copy of the Memorandum  
is attached hereto as Exhibit "A" to enable Defendant to prepare to meet the request.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to H. Bryan  
Boukari, Boukari Law, P.A., 14804 Main Street, Alachua, FL 32615, by email to  
[Bryan@BoukariLaw.com](mailto:Bryan@BoukariLaw.com), [Service@BoukariLaw.com](mailto:Service@BoukariLaw.com) via Florida Court's E-Portal filing  
system, this 29th day of April 2025.

CLAYTON-JOHNSTON, P.A.

/s/ Leonard E. Ireland, Jr.

LEONARD E. IRELAND, JR.

Florida Bar No. 104630

11129 NW 12th Place

Gainesville, Florida 32608

352-376-4694

Attorney for Plaintiff/Counter-Defendant.

[Lireland@Clayton-Johnston.com](mailto:Lireland@Clayton-Johnston.com)

[Tbrehm@Clayton-Johnston.com](mailto:Tbrehm@Clayton-Johnston.com)

# Exhibit “A”

*Florida Department of Law Enforcement*

**Memorandum**

*Office of Inspector General*



DATE: March 28, 2025

TO: Case File 2024INQ-021

Meschelle F. Long

Digitally signed by Meschelle F. Long  
Date: 2025.03.28 14:45:17 -04'00'

VIA: Chain-of-Command

FROM: Inspector Troy K. Cope

Digitally signed by Troy K.  
Cope  
Date: 2025.03.28 12:38:00  
-04'00'

Luis  
Negrete

Digitally signed  
by Luis Negrete  
Date:  
2025.03.28  
15:04:32 -04'00'

SUBJECT: Attorney Linda Rice Chapman Complaint

On July 10, 2024, the Florida Department of Law Enforcement (FDLE), Office of Inspector General (OIG), Professional Standards Unit (PSU) received correspondence from attorney Linda Rice Chapman via the Office of the Chief Inspector General (CIG) regarding a search warrant executed in Alachua, Florida, on July 3, 2024.

The complainant, Chapman, expressed concerns about FDLE Jacksonville Regional Operations Center (JROC), Gainesville Field Office (GFO), Special Agent Yolanda Carbia. Chapman stated her law office was raided on July 3, 2024, via a search warrant. The search warrant named the businesses Alachua Today and Boukari Law as the premises to be searched; however, when she arrived at her office, she found it cordoned off. Chapman protested to an FDLE Agent that she had sensitive client documents in her office. According to Chapman, when she asked for a copy of the search warrant, there was no warrant at the search site for her review. Chapman advised she was outraged that FDLE Agents proceeded to illegally search her office, even after they noticed that it was her office and not Suite 200. Chapman alleged when she returned to her office after the search, her legal papers were not as she had left them earlier that day.

According to Chapman, Special Agent Carbia posted the media story on her Facebook page approximately four hours after the execution of the search warrant, along with a picture of a margarita and a caption that read, "after a long day of fighting crime."

FDLE OIG PSU Inspector Troy Cope was assigned to review the allegations by Chapman. All documents relating to the preliminary inquiry will be maintained electronically in the Office of Inspector General's database, which should be reviewed if additional information is needed.

**COMPLAINT REVIEW**

During the course of this preliminary inquiry, Inspector Cope reviewed information obtained from Chapman's complaint documents and follow-up emails, reviewed relevant FDLE case files (FDLE Cases JA-20-0177/JA-48-1717), FDLE Operational Plans, search warrant and associated affidavit for search warrant, crime scene photographs, and public records related to Linda Rice Chapman, P.A., Alachua Today, Inc., and Boukari Law, P.A. The following is a summary of the analysis of the allegations against SA Carbia from Chapman's written complaint:

**Allegation 1: Chapman alleged FDLE agents illegally searched her office, after she notified FDLE agents that suite 100 was her office suite. Chapman alleged that her legal papers were not as she had left them earlier in the day, and appeared a case from High Springs was rifled through. Chapman asked for a copy of the search warrant but claimed that a copy was not available to be provided to her.**

On July 2, 2024, SA Carbia obtained a search warrant for the following location as described in the search warrant description of the premises as follows:

*The premises to be searched is a business located at 14804 Main Street, Suite 200, Alachua, FL 32615 (Alachua County). The business is a single-story building. The building's exterior is covered with brick and the sides are concrete block. The roof is gray/white in color. The building is clearly marked on the outside, with signage for both "Alachua Today" and "Boukari Law." The numbers "14804" are displayed in gold numbers on the outside of the building. There are two business doors, black in color, located on the south and north end of the business.*

The search warrant application and affidavit referenced the business Alachua Today, along with referring the premises as the Alachua Today building. Pertinent excerpts from the search warrant application and affidavit are as follows:

- *Victim 2 told YA that after the Facebook posts that Adam began removing items from his family's business, Alachua Today, Inc. (Alachua Today) which is the premises to be searched, in an effort to destroy evidence (page 2/paragraph 4).*
- *... she confirmed that semen from crimes as early as 2006 could still be present in the Alachua Today building and be viable for DNA testing (page 4/paragraph 1).*
- *Based on the number of known victims, probable victims, and number of sex acts Adam has committed that have resulted in male ejaculation, it is highly probable for Alachua Today to contain trace evidence of semen from many victims. Your affiant knows that Victim 2 and another boy have ejaculated, in one spot in that building at least 45 if not 65 times (page 4/paragraph 2).*
- *BASED ON THE FOREGOING, YOUR AFFIANT has reason to believe and does believe that the structure in question has contained in the past, and does contain now, certain instrumentalities and contraband which constitutes a violation of laws of the State of Florida, or certain evidence which constitutes proof of a violation of the laws of the State of Florida, and based upon the foregoing, requests issuance of search warrant for the above-described business to allow seizure of the above-described items.*

The search warrant was executed on July 3, 2024, at approximately 1430 hours. Inspector Cope obtained the FDLE Operational Plan for the search warrant, which provided the following background information and scope of the search warrant:

*An FDLE investigation revealed that sexual acts have occurred at Alachua Today/Boukari Law involving juvenile victims. The acts occurred sometime around*

*the time period of 2006 –2021. The acts involved the target of this investigation, Adam Boukari and juvenile boys.*

*The building houses two businesses Alachua Today and Boukari Law. Both businesses are owned by the Boukari family.*

*Photographs will be obtained and a search warrant for bodily fluids to include semen has been obtained. The scene will be processed by FDLE Crime Lab personnel with assistance from FDLE GFO Special Agents.*

It should be noted on page h of the FDLE Operational Plan contained a photograph of the front of the premises, which depicted Chapman's business sign prominently displayed to the left of the main entrance to the premises.

SA Carbia authored Investigative Report (IR) #85 titled "Search Warrant: Alachua Today/Boukari Law. SA Carbia wrote the following regarding obtaining the search warrant and the scope of the search warrant:

*On Tuesday, July 2, 2024, Special Agent (SA) Yolanda Maria Carbia obtained a search warrant for the building located at 14804 Main Street, suite 200, Alachua, FL 32615, Alachua Today and Boukari Law. Both businesses are adjoined with no partition or physical barrier. The physical diagram of the business was also confirmed via the Alachua County Property Appraiser site. Both businesses are owned by the Boukari family.*

It should be noted, per the IR, SA Carbia served and read the search warrant to H. Bryan Boukari, who was listed in the search warrant as a person with control over the premises.

Inspector Cope reviewed the publicly available records on the Alachua County Property Appraiser's (ACPA) website for the property located at 14804 Main Street in Alachua, Florida. The records from ACPA indicated the parcel was owned by Alachua Today, Inc. with the address of P.O. Box 2135, Alachua, FL 32616.

Inspector Cope reviewed the publicly available records from Florida Department of State Division of Corporations (Sunbiz.org) related to Alachua Today, Inc. and Boukari Law, P.A. The records from Sunbiz.org indicated the principal business address for Alachua Today, Inc. is 14804 Main Street, Suite 200, Alachua, FL 32615. This has been the principal address since the inception of Alachua Today, Inc. on November 2, 2000. The records from SunBiz.org indicated the principal address for Boukari Law, P.A. is 14804 Main Street, Alachua, FL 32615.

Chapman advised in her complaint that her law office's sign was affixed to the exterior of the building located at 14804 Main Street in Alachua, Florida, at the main entrance door (north door), and "suite 100" is displayed on the south door of the front of the building. Photographs personally obtained by Inspector Cope and from the photographs taken during the search warrant confirmed the location of the signage and "Suite 100" was displayed on the south door as described by Chapman. Chapman advised that her diplomas and business license were prominently displayed in the office. Chapman provided Inspector Cope a copy of her City of Alachua Local Business Tax Receipt, issued September of 2023, which indicated Linda Rice Chapman, P.A. had paid the local business tax. The address listed on the tax receipt was 14804 Main Street in Alachua, Florida. Crime scene photographs confirmed the diplomas were hanging on the wall as described, and the tax receipt was in plain sight, sitting on top of a box behind Chapman's desk chair.

Inspector Cope reviewed the publicly available records from SunBiz.org related to Linda Rice Chapman, P.A. The records from SunBiz.org revealed the principal address registered for Linda Rice Chapman, P.A., filed by Chapman in March of 2024, was 23247 NW 199<sup>th</sup> Place No. 18, High Springs, FL 32643. 14804 Main Street in Alachua, Florida, has never been registered as principal address for Linda Rice Chapman, P.A. It should be noted that crime scene photographs in the lobby of the premises depicted Chapman's business cards for Linda Rice Chapman, P.A. The address listed on her business cards was 23247 NW 199<sup>th</sup> Place No. 18, High Springs, Florida.

Inspector Cope reviewed Chapman's member profile with the Florida Bar. Per the Florida Bar, Chapman's mailing and physical address is 14804 Main Street, Alachua, FL 32615-8590. The member profile also listed Chapman as being associated with the firm "Boukari Law, P.A." as an "Of Counsel" attorney.

Chapman's complaint referenced a civil case (2022-CA-002631 – Alachua County), which Bryan Boukari was the plaintiff's attorney. Inspector Cope searched the Alachua County Clerk of Court's public court records for the civil case. Inspector Cope located a court filing on November 14, 2023, where Chapman filed a "Notice of Limited Appearance". The notice requested, "Copies of all pleadings, notices and correspondence concerning same are requested to be served on undersigned counsel." The undersigned counsel was Linda Rice Chapman, Esquire, at the address of Boukari Law, P.A. 14804 Main Street, Alachua, FL 32615. Within the same case, Inspector Cope located a letter submitted to the case by H. Bryan Boukari, composed on the Boukari Law, P.A. letterhead, which identified Chapman as "Of Counsel" on the letterhead.

Inspector Cope did not locate any document filed with any entity or public advertisement that listed Linda Rice Chapman, P.A. as being in suite 100 of 14804 Main Street in Alachua, Florida.

On September 10, 2024, Inspector Cope called and spoke with Chapman to request any document or court filing where she filed the document or court filing under Linda Rice Chapman, P.A. and utilized suite 100. Chapman advised she did not have a document to provide Inspector Cope with those parameters.

Inspector Cope reviewed the crime scene photographs to determine if there was any specified delineation of office suite numbers inside the premises. The crime scene photographs were collected by FDLE Crime Scene and submitted into FDLE's Evidence Vault in JROC. Photographs were taken prior to the search of the premises being commenced, areas where evidence was collected or seized, and prior to FDLE personnel leaving the premises at the conclusion of the search warrant.

A review of the photographs determined that there was no delineation, partition, or otherwise division of the interior into two or three separate offices/suites. Each separate entity Alachua Today, Inc. and Boukari Law, P.A. had access to all areas of the premises to include Chapman's office. Chapman's office door on the interior had no identifying office suite number or signage indicating a separate law firm was contained in the room.

Chapman alleged that a case she was working on was rifled through. On July 25, 2024, Inspector Cope and FDLE OIG PSU Inspector Danielle Gill met with Chapman and H. Bryan Boukari in Alachua, Florida. It should be noted both declined to provide sworn statements to FDLE OIG. Chapman and H. Bryan Boukari created a diagram of Chapman's office and marked the location of these documents that were alleged to have been rifled through. The location of the documents was at the front left corner of Chapman's desk (near the exterior door of the office). Inspector

Cope reviewed crime scene photographs of this area and was able to confirm that these documents were undisturbed based on the pre and post search warrant photographs. It should be noted the crime scene photographs indicated a stack of documents located on a chair near the exterior door appeared to have been moved, though they remained in the chair, and a stack of two banker's boxes on the floor was moved from its original orientation by 45-degrees. No evidence was obtained and collected/removed from Chapman's office. The photographs of Chapman's office that were reviewed were taken approximately three-and-a-half hours apart.

Chapman also alleged to OIG Inspectors that the phone on her desk fell off the cradle and her printer was not put back properly where it was located. Inspector Cope reviewed the crime scene photographs and determined the phone and printer in Chapman's office were in the same orientation before and after the search and were not moved.

**Allegation 2: The warrant seeking bodily fluids includes the term "semen" with a capital "S", was inflammatory and unnecessary. Additionally, those bodily fluids would not exist today based on the passage of time.**

Inspector Cope reviewed the search warrant application and affidavit, which revealed the alleged criminal activity was sexual in nature involving male ejaculation in multiple areas of the premises encompassing multiple years. Information contained in the search warrant application and affidavit presented scientific findings that indicated the recovery and analysis of semen could be accomplished on samples many decades old. The specification that the bodily fluid being sought was "Semen" was depicted in the search warrant.

**Allegation 3: Chapman alleged FDLE has violated her and Boukari Law's client's attorney/client privilege by executing the search warrant and photographing the office. Sensitive, private information may be depicted in the photographs. Chapman had demanded FDLE turn over photographs and the supporting affidavit (Public Record Request) for the search warrant immediately.**

Chapman alleged that photographs taken by FDLE during the execution of the search warrant violated attorney/client privilege of her and Boukari Law, P.A.'s clients. Inspector Cope obtained the crime scene photographs from the execution of the search warrant. Photographs of the exterior and interior of the premises were taken prior to the search of the building and after. Some photographs depicted number placards which corresponded to evidence items collected by FDLE.

FDLE's Operational Procedure governing the execution of a search warrants by FDLE members requires, "Photographs or videos of the location to be searched should be taken prior to and after the search to document conditions before and after."

**Allegation 4: Chapman, identified as the personal attorney of Bryan Boukari, alleged the bag he utilized to carry documents to court was illegally seized, along with the contents of the bag (contained documents from recent court appearances), which were not noted in the Inventory/Return. Some of the documents are believed to be related to litigation involving the law firm of Bobi Frank. Seizure of these items impeded a court deadline at 5pm on July 3, 2024, by Bryan Boukari. Additionally, the raid prevented him from making the deadline.**

Inspector Cope reviewed the Inventory/Return of the search warrant and found a laptop bag was seized from H. Bryan Boukari's office. Photographs depicted the laptop bag as being on the floor

between the couch and wall. The photographs did not provide a look inside the laptop bag to determine if any documents were located inside the laptop bag. FDLE OIG notified JROC command staff about the allegation of privileged information possibly being taken by FDLE members from the premises, to take whatever action deemed necessary.

On November 7, 2024, H. Bryan Boukari asked the court for the return of all items seized by FDLE on July 3, 2024, because of the execution of the search warrant. Additionally, it was argued that the items were seized without probable cause. On November 14, 2024, FDLE was ordered to return only the items within the bag seized by FDLE (not the bag itself). On November 20, 2024, the contents from the bag were returned. The items returned were two pens, a highlighter, pink sticky notes (blank), a small piece of paper (blank), and a fruit snack pack. No legal pad or files were contained in the bag.

**Allegation 5: Chapman's email was alleged to have been open and accessible to agents during the execution of the search warrant, exposing trial strategy, and invading her attorney/client privilege.**

On July 25, 2024, Inspector Cope and Inspector Gill met with Chapman, who was asked to provide more details on her computer and how she left it when she went to lunch on July 3, 2024, prior to the execution of the search warrant. Chapman indicated her computer was left on because she never turns it off and her computer did not have the screen saver function activated.

Inspector Cope reviewed the crime scene photographs and found that the initial photographs of Chapman's office depicted her computer screen as being black and not displaying any contents of Chapman's computer. The second set of photographs taken of Chapman's office (approximately three-and-a-half-hours later) also depicted her computer screen as being black.

**Allegation 6: Chapman alleged SA Carbia is a close, personal friend of attorney Bobi Frank, whose office is representing a client in a contentious lawsuit and is the reason for the genesis of this search warrant to get access to privileged information.**

Chapman's allegation identified civil case (2022-CA-002631 – Alachua County), which was also revealed to be the case in question regarding Chapman's complaint. Inspector Cope reviewed publicly available documents contained on the Alachua County Clerk of Court's website. Inspector Cope found that the opposing counsel to H. Bryan Boukari was Leonard E. Ireland Jr., who was associated with another law firm. Chapman and H. Bryan Boukari advised that attorney Bobi Frank was allowing Ireland to work out of her law office.

Chapman and H. Bryan Boukari advised Inspector Cope and Inspector Gill that the plaintiffs in the case, Mary Combs and Garvin Combs, used to own a business next to Boukari Law, P.A. and it was their belief based in subsequent court filings to the execution of the search warrant that they were involved. Chapman and H. Bryan Boukari indicated Mary Combs made a comment during a deposition, which she stated the whole Boukari family was going to jail. Additionally, Mary Combs, through her attorney, filed a motion to not be deposed in person again by H. Bryan Boukari because she feared being questioned about the search warrant due to H. Bryan Boukari's belief she was involved (Plaintiff's Verified Emergency Motion for Protective Order / July 9, 2024).

Inspector Cope reviewed the case file, which revealed both Mary and Garvin Combs were interviewed as witnesses for FDLE Case #JA-20-0177 and therefore would have knowledge of an active criminal investigation after being interviewed on April 16, 2024. Inspector Cope also

determined that the genesis of this investigation came from a Source of Information (SOI) who initially went to the State Attorney's Office (SAO) in Gainesville, who referred the SOI to Frank. Subsequently, Frank brought the information to FDLE. Additionally, Frank brought the same information from the SOI a year prior (October 2022) to the FDLE Gainesville Field Office (GFO), but the SOI did not return phone calls when GFO personnel reached out.

**Allegation 7: Chapman alleged misconduct on the part of SA Carbia for posting a picture of a margarita on her Facebook page with a link to a news article about the search warrant. Alleged SA Carbia leaked the warrant to the media, because they showed up at the scene. H. Bryan Boukari provide a video clip of an FDLE member's interaction with Frank during the execution of the search warrant he alleged was inappropriate.**

Chapman and H. Bryan Boukari provided Inspector Cope and Inspector Gill printouts of Facebook posts attributed to SA Carbia that they believed were inappropriate and/or established a personal relationship with individuals related to the criminal investigation that was a conflict of interest. The printouts reflected Facebook posts by username "Blu-Iron Yoly". The first post provided was dated July 3, 2024, and stated, "After a long day of fighting crime, my neighbors tell me to check our fence". The picture in the Facebook post was a margarita sitting on a fence post. Chapman indicated the post was inappropriate because SA Carbia shared a news story from the Alachua Chronicle an hour later, which depicted the Alachua Chronicle's news story about the search warrant executed at the Alachua Today building earlier that day by SA Carbia. A review of the posting indicated SA Carbia did not add any additional comments to the reposted Alachua Chronicle news story. Chapman alleged SA Carbia tipped the Alachua Chronical off about the search warrant to further sensationalize the investigation and embarrass the Boukari family. Chapman and H. Bryan Boukari did not provide the exact time the media arrived on July 3, 2024, during the execution of the search warrant, but estimated within 20 to 30 minutes.

The second Facebook post provided was by "Colby Blake Thompson", which stated, "Enjoying this beautiful holiday weekend!" The comments section of this post depicted SA Carbia commenting about the post and, wishing Thompson a good weekend, and Thompson responding, "Hopefully talk soon!" It should be noted, a review of the case file revealed Thompson was a witness in the criminal investigation and was being represented by Frank regarding a dispute with SFHS. Thompson was a vocal critic of SFHS, the Alachua County School Board, after finding out about allegations of crimes against children being investigated at SFHS.

The third Facebook post was from Bobi J. Frank Law P.A.'s Facebook page, which depicted a repost from the Gainesville Police Department on September 10, 2017. The post stated, "Members from all different agencies assigned to the Alachua County Emergency Management EOC." SA Carbia was pictured with several other individuals from various law enforcement agencies from Alachua County.

Chapman provided two additional posts from "Colby Blake Thompson" via email on August 14, 2024. The first post by Thompson stated:

*Operation Safe Education*

*I support the maximum punishments allowed by law, for all perpetrators, their accomplices and any accessory before, during or after the act of any criminal activities involving human trafficking or crimes against children.*

*Save Our Children*

Save Our Schools  
Save Our Future

The second post by Thompson stated:

*Kind of ironic for someone who made a salary off these kids to have any opinion of a sponsor pulling signage from a campus. I said what I said. #SitDown #Shutup*

Both posts were "liked" by "Blu-Iron Yoly". No dates of when the posts by Thompson were listed on the screen shots provided by Chapman. Inspector Cope confirmed Thompson was interviewed as a witness as part of the criminal investigation.

Chapman and H. Bryan Boukari believed confidential information was being leaked to the media by SA Carbia based on reporting in various media outlets about the on-going criminal investigation related to SFHS. Chapman provided a news article dated March 8, 2024, from WCJB Channel 20 in Gainesville, titled "FDLE reportedly investigating crimes against children at Santa Fe High School". The article reported Colby Thompson's business was removing their business' logo from the school's campus after learning about the allegation of crimes being committed against children at SFHS. Thompson's attorney was also Frank, who wrote a letter to SFHS's principal and revealed the FDLE investigation into the allegations.

Inspector Cope found several more articles related to FDLE investigating the allegations at SFHS, to include FDLE confirming an open and active investigation into crimes against children on March 21, 2024. Inspector Cope's review of the media articles related to the investigation found no information in the articles that would constitute the release of confidential information of an active criminal investigation.

**Allegation 8: H. Bryan Boukari provided a video clip of an FDLE member's interaction with Frank during the execution of the search warrant he alleged was inappropriate.**

H. Bryan Boukari provided a video clip from January 3, 2024, which was alleged to contain proof of an inappropriate exchange between and an FDLE "agent" and Frank. H. Bryan Boukari indicated Frank and the "agent" were talking across the street during the search warrant, and the fact that Frank placed her hands on the arm of the "agent" showed that they were too friendly with each other. Additionally, H. Bryan Boukari alleged that Frank made the following statement, "I am here for all the details.", as the "agent" was walking away.

Inspector Cope reviewed the video clip provided by H. Bryan Boukari. The video clip's timestamp displayed the date of July 2, 2024, and began at 14:44:41 hours and ended at 14:46:38 hours. The video clip showed an FDLE civilian member (based on grey polo shirt and blue tactical pants) speaking with three females across the street from the premises. The FDLE member appears to primarily be speaking with a woman wearing pink pants and a grey long-sleeve shirt (identified as Frank). The video did not show if the group of women or the FDLE member initiated the conversation. Frank touched the back of the FDLE members' arm from 14:45:19 to 14:45:29. At the 14:45:29 mark, the FDLE member walked away from Frank. Audio captured Frank speaking to the FDLE member as she walked away, but it was inaudible, except for ".... Taylor. Bye." It should be noted, FDLE JROC Regional Legal Advisor Taylor McQuaide was on-scene during the execution of the search warrant.

**Miscellaneous Allegations:** Chapman and H. Bryan Boukari also made several miscellaneous complaints related to the investigation that were found to be statements of opinion.

Chapman and H. Bryan Boukari provided a photograph of the outside of the premises during the search warrant (time unknown), which depicted six FDLE members and one Alachua County Sheriff's Office Deputy. H. Bryan Boukari indicated that this photograph demonstrated an unnecessary show of force by FDLE because there were so many law enforcement officers present. Additionally, H. Bryan Boukari alleged it was inappropriate that FDLE and ACSO members performed a "safety search" of the premises because he was an attorney and posed no danger to law enforcement's safety.

### **Conclusions and Recommendations**

Inspector Cope reviewed Chapman's complaint, additional complaints provided by H. Bryan Boukari, associated exhibits, and information obtained from the FDLE case file. Based on the review, Inspector Cope was able to determine the following:

- On July 3, 2024, FDLE agents with the GFO executed a search warrant at the premises located at 14804 Main Street in Alachua, Florida, based on SA Carbia's search warrant, signed on July 2, 2024. It should be noted the search warrant was properly served (copy provided) to H. Bryan Boukari on July 3, 2024. The search warrant, search warrant affidavit, and FDLE Operational Plan indicated the premises to be searched was located at 14804 Main Street, Suite 200, Alachua, FL 32615. The search warrant and search warrant affidavit describe the premises as being the building as a whole and the entire building was the objective of the search, yet delineated suite number 200 in the description.

Chapman claimed that her law office, Linda Rice Chapman, P.A., was in suite 100 of the premises and was entered/searched illegally by FDLE agents. The FDLE Operational Plan contained a photograph of the front of the building that clearly depicted a sign next to the front door of main entrance of the premises for "Linda Rice Chapman, P.A." Additionally, "Suite 100" was listed in white letters above the secondary entrance (south front entrance) to the front of the premises that led into Chapman's office. These facts, though visible were not addressed in the composition of the search warrant.

A review of crime scene photographs obtained by FDLE Crime Scene personnel from the execution of the search warrant indicated Chapman's office was photographed prior to the search and following the search per FDLE policy. The photographs indicate boxes were shifted on the floor of Chapman's office, but documents were not "rifled" through as claimed, and the documents specifically identified as being moved by FDLE agents per Chapman and H. Bryan Boukari were not touched as depicted in the photographs taken many hours apart. No evidentiary items were obtained from Chapman's office. Additionally, the photographs showed that there was no partition or delineation of separate suite numbers within the premises. All spaces/businesses had free access to each other's workspace.

Inspector Cope conducted research related to Linda Rice Chapman, P.A. and found that the firm had never utilized the premises address to register with Sunbiz.org or the Florida Bar. The only time Linda Rice Chapman, P.A. utilized suite 100 as her address was for

her complaint to the CIG. Additionally, per the Florida Bar, Chapman was associated with Boukari Law, P.A. as "Of Counsel".

The determination if an illegal or improper search was conducted lies with the courts and is outside the purview of the OIG.

- Chapman alleged bodily fluids, specifically semen, would not be present today if the criminal activity occurred years and/or decades prior. The search warrant affidavit adequately addressed this issue, and informed semen could still be present though substantial amount of time has passed from the alleged criminal activity. The capitalization of "Semen" in the search warrant properly described what was being searched for and does not violate FDLE policy or procedure.
- Chapman and H. Bryan Boukari alleged their clients' attorney/client privilege was violated when photographs of their office spaces were obtained by FDLE. Inspector Cope reviewed photographs obtained as part of the search warrant. It was found the photographs followed FDLE's Operational Procedure governing the execution of a search warrants by FDLE members, which requires "Photographs or videos of the location to be searched should be taken prior to and after the search to document conditions before and after." FDLE personnel properly completed this requirement of executing a search warrant per FDLE policy and procedures.
- Chapman and H. Bryan Boukari alleged personal notes and client files located inside a bag seized by FDLE. It was determined that the bag seized did not contain any notes, legal pad(s), or client files. This allegation was unfounded.
- Chapman alleged her emails were accessible to FDLE personnel during the execution of the search warrant, which would have violated attorney/client privilege and allowed unauthorized access to her emails. Based on a review of the before and after photographs obtained for the search warrant, Chapman's computer screen was black. Based on Chapman's statements to OIG Inspectors that she did not have a screen saver function on her computer activated, the preponderance of evidence would suggest her computer was turned off during the execution of the search warrant, thus, FDLE personnel did not have access to Chapman's emails.
- Chapman alleged the genesis of the criminal investigation was because of Frank's close personal relationship with SA Carbia. It was determined that this case was not exclusively brought by Frank to SA Carbia. The SOI brought the allegations to another law enforcement agency who suggested the SOI go to Frank. Subsequently, Frank tried to have the SOI interviewed by FDLE a year prior to the culmination of the current investigation, which did not involve SA Carbia.
- Chapman and H. Bryan Boukari alleged misconduct on the part of SA Carbia for social media posts made hours after the execution of the search warrant and leaked confidential information to the media. Inspector Cope located numerous articles related to the investigation and execution of the search warrant. It was found that the case had been widely publicized in the media since March of 2024, and that the allegations involved crimes against children. No information located in the news articles contained confidential information from the case file. The media showing up to the execution of the search warrant after its culmination was not evidence that SA Carbia tipped off the media about

the search warrant. SA Carbia did "like" Facebook posts by witnesses to this investigation after they had been interviewed, but this action does not violate FDLE Policy or Procedures.

Based on the information reviewed, no internal investigation was warranted in this matter at this time; however, it is recommended that JROC command staff review the interactions SA Carbia had on social media with witnesses to an active criminal investigation and take any action deemed necessary.