



# THE FLORIDA BAR

1200 EDGEWATER DRIVE  
ORLANDO, FL 32804-6314

LAWYER REGULATION DEPARTMENT 407/425-5424  
UPL DEPARTMENT 407/425-0473  
WWW.FLABAR.ORG

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

February 2, 2007

Catherine Chien  
Public Defender's Office  
435 N. Orange Avenue, Suite 400  
Orlando, FL 32801-1526

RE: Complaint by John Dobbs #06048638  
Case No. 2007-31,230(09A)

Dear Ms. Chien:

Enclosed you will find copies of correspondence received by The Florida Bar from the above-referenced complainant.

Please respond directly to this office within fifteen (15) days, with a copy to the complainant, and present your position. You are obligated to provide the complainant with a written response pursuant to R. Regulating Fla. Bar 4-8.4(g), and you are required to disclose to the partners and shareholders of your firm the existence and nature of this inquiry. Please fill out and return the enclosed disclosure form, using the above case number on all correspondence to this office.

By copy of this letter, the complainant is advised that the bar's inquiry will address possible violations of The Rules Regulating The Florida Bar only, and will not directly address any particular legal problem. Upon receipt of your response, complainant has ten (10) days to submit to this office any response or additional information complainant wishes the bar to consider.

Sincerely,

Patricia Ann Toro Savitz  
Bar Counsel

PATS/dak

Enclosure

cc: John Dobbs #06048638  
Orange County Jail  
P. O. Box 4970  
Orlando, FL 32802

Pursuant to Florida Rules of Criminal Procedure 3.220(h) please contact the undersigned's office to coordinate the date, time and location of any depositions to be scheduled.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to Catherine Chien, 435 N. Orange Avenue, Suite 400, Orlando, FL 32801 on this 23 day of February, 2007.

LAWSON L. LAMAR  
State Attorney

By: LS

Kimberly Laskoff  
Assistant State Attorney  
Florida Bar # 136476  
415 N. Orange Avenue, P.O. Box 1673  
Suite 400  
Orlando, FL 32802  
(407)836-2416

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND FOR  
ORANGE COUNTY, FLORIDA

STATE OF FLORIDA  
Plaintiff,

CASE NO: 48-2006-CF-015201-O

vs.

DIVISION: 16

JOHN W. DOBBS  
Defendant.

SUPPLEMENTAL  
STATE WITNESS LIST

COMES NOW the State of Florida, pursuant to Florida Rules of Criminal Procedure 3.220(b), and in response to the Defendant's Notice for Discovery discloses the following names and addresses of all persons known to the prosecutor to have information which may be relevant to any offense charged, or any defense, thereto, or to any similar fact evidence to be presented at trial under Section 90.404(2), Florida Statutes:

CATEGORY "A"

Shaundra Gabriel, FDLE - Orlando, 500 W. Robinson Street, Lab# 20060514280, Orlando, FL 32801

Amanda Johnson, FDLE - Orlando, 500 W. Robinson Street, Lab# 20060514280, Orlando, FL 32801

CATEGORY "B" - None

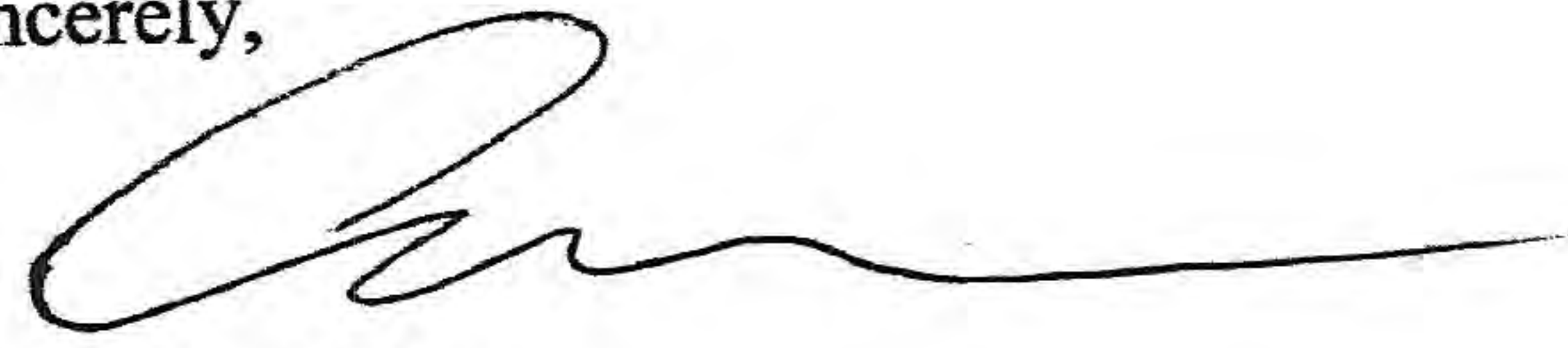
CATEGORY "C" - None

Patricia Ann Toro Savitz, Esq.  
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him I was unable to argue at an Adversary Preliminary Hearing that as a matter of law, there was no probable cause. I explained that there was a dead body along with witness testimony that he allegedly caused the death, hence the probable cause, and that self-defense was a justification argument that goes to the jury to decide. I did say I would tell the court he wanted to address the court and he was allowed to present some of his arguments before the Judge cut him off.

I deny the allegations in this complaint. If you have any questions, please contact my office at (407)836-4816. Thank you.

Sincerely,



Catherine Chien  
Assistant Public Defender

cc: Mr. John Dobbs #06048638 ✓

Patricia Ann Toro Savitz, Esq.

February 12, 2007

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Second, Mr. Dobbs states, "I have vigorously requested page 8 of Deanna Washington's statement which was missing from discovery." On December 21, 2006, Mr. Dobbs informed me he wanted page 8 of Deanna Washington's statement. On December 22, 2006, I requested a copy of page 8 of Deanna Washington's statement. Our office received it on January 11, 2006 which I then provided a copy of to Mr. Dobbs.

Third, Mr. Dobbs states, "She has constantly refused my request to confide in my father Michigan Attorney Edward Lawrence Dobbs." Due to the attorney-client privilege rule, I will speak to other people only about procedural issues. I have spoken with his father on November 9 and November 22, 2006.

Fourth, Mr. Dobbs states, "She has until recently refused to contact my witnesses and has discouraged me with a negative view of my chances from the beginning." I received his file on November 6, 2006. I spoke with defense witness Deanna Washington on November 22, 2006. On December 3, 2006, Mr. Dobbs provided me with DJ's phone number and I left a message with DJ on December 10, 2006. DJ later called me and we spoke on the phone. In addition, I have not told Mr. Dobbs that he would either win or lose at trial. He asked me if he would win at trial and when I refused to say he would win at trial, he took that to mean I thought he had a bad case. I told him I was not saying he had a bad case but that no attorney should ever tell a client they will win at trial. I have said we should be prepared for trial and we were not ready for trial. He wanted to go to trial within 3 months of his arrest. I recommended waiving speedy trial in order to have time to depose all the state witnesses, have a doctor look at the photos of the deceased and Mr. Dobbs to determine if the wounds he sustained were defense wounds, wait for the GSR test that would prove he never fired the gun, as well as other things that should be done. However, he did not want to waive speedy trial.

Fifth, "I also believe she has purposely discouraged my girlfriend Deanna Washington from standing by my side because since Deanna came from Georgia to see her she (Deanna) has decided not to testify in a case where she was with me and also being attacked." I deny this. I did not in any way discourage her from standing by Mr. Dobbs' side. On November 22, 2006, I spoke with Ms. Washington about what happened the night of the incident and asked her to testify for the defense and she said she would.

Sixth, "This attorney called my mother that I am going to lose at trial and refuses to present arguments I want her to bring before the court. She keeps advising me to fire her but I will not because it will change all my court dates and I am confident in my case. I am being charged with 2<sup>nd</sup> Degree Murder, 2 counts Aggravated Battery with a Weapon, Aggravated Assault with a Firearm, and Shooting from a Vehicle." I did call Mr. Dobbs' mother on January 18, 2007 for the exact addresses where I could serve Deanna Washington in Georgia. I deny telling her Mr. Dobbs was going to lose at trial. In addition, I did refuse to present the arguments he asked me to present before the court. They were legal arguments that were not correct in the law. For example, he wanted me to argue at the Adversary Preliminary Hearing that there was no probable cause for these charges and that as a matter of law, these charges should be dismissed at that hearing because this was a case of self-defense. I told him that self-defense is an issue for the trier of fact. He argued that all the witnesses and victims contradict each other and therefore, they are lying, not believable, and as a matter of law, it was self-defense. I told