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June 1, 2009

Office of Attorney General
State of Florida
The Capitol PL-01
Tallahassee, FL
32399-1050

In re: Formal Complaint/Request for Investigation

Dear Attorney General:

Please accept my official complaint and request for inquiry into the conduct and actions of Florida Attorney:

Kim Picazio
One Financial Plaza
100 Southeast 3rd Avenue Suite 2500
Fort Lauderdale
Florida 33394
954.467.5558

On 5/14/09, in my capacity as experienced news reporter and magazine writer I contacted Florida Attorney Kim Picazio by email. I contacted Kim Picazio because she is the attorney representing Crystal Sheffield, biological mother of Haleigh Cummings who was reported missing from her home in Satsuma on February 10, 2009.

I submitted to Ms. Picazio a set of questions that I had developed based upon interviews I had conducted with William E. Staubs, a bondsman and private investigator who was investigating the disappearance and whereabouts of Haleigh Cummings under his contract with Crystal Sheffield's father; John Sheffield.

Ms. Picazio telephoned me in regards to the questions I had been asking and she spoke with me in great detail about a great many things. I would estimate the time we spent on the phone was approximately four hours. Some of this time included conversations between me and her husband, Michael Picazio.

During the interviews Ms. Picazio attempted many times to steer me away from the story I was pursuing. I believe she granted the interview because she believed she could talk me out of doing the story.

On 5/24/09 I submitted for publication, and personally published on my website, www.writeintoaction.com a story entitled "William 'COBRA' Staubs announces intent to file BAR complaint against florida attorney Kim Picazio." The news piece adhered to Associated Press format, was multi-sourced, contained quotes from many separate individual who I had interviewed, and was entirely factual.

On 5/28/09 Kim Picazio emailed me and said, "You have violated my specific instructions, you have misquoted me, as well as my Husband, you have given the public a wholly misleading interpretation of the fact, etc. etc. You have published outright fallacious statements. I have contacted a media/1st amendment attorney to handle these issues. I will not speak or write to you anymore. I do not wish to have any further contact with you whatsoever. And you think this will aid the search for missing Haleigh? Never contact me directly again. My lawyer will be in contact with you."

On 5/28/09 I emailed Florida Attorney Pedro E. Dijols and advised him that his client was making completely ridiculous accusations against me and implying she was going to take legal action against me. I strongly cautioned Mr.Dijols to advise his client to cease and desist with her antics and menacing ominous statements to harm me through unwarranted legal action.

On 5/30/09 I was a Cc on an email from William Staubs to Kim Picazio wherein Staubs was responding to a host of legal threats Picazio was making against him, as well as me. In her legal wild rant Ms. Picazio cited non-applicable statutes pertaining to activities that never took place, and created fictitious accusations of serious crimes against me (as well as Staubs.) Ms. Picazio made the false and outlandish claim that I and/or William Staubs were involved in a plan to extort money from her and her husband.

This fabricated claim is so ridiculous it could never be believed without a complete suspension of reality.

I know to be true that Ms. Picazio has come to regret granting me extensive interviews and fears for her future as an attorney because of the information she shared with me.

I believe the information Ms. Picazio willingly shared has become the quasi lie detector for any legal proceedings that may be brought against her in the future, and for this, she has targeted me.

I believe Kim Picazio has engaged in criminal and unethical conduct and should be investigated by the Office of the Attorney General.

The following contains acts I am aware of at this time. There may be more forthcoming as I continue to review my material.

All supporting documentation for the statements herein have been secured and shall not disappear in the event something happens to me.

Criminal Intent and Illegal Solicitation

Florida Bondsman and Private Investigator William E. Staubs told me Florida Attorney Kim Picazio asked him to falsely, and criminally, implicate Gregory Page to authorities in the Haleigh Cummings missing person's case. Staubs told me he flatly refused. Staubs said he will take a polygraph on this matter.

Reckless Endangerment of a Child

I have information through witnesses that Florida Attorney Kim Picazio participated in covering up a situation that involved her client, Crystal Sheffield, another female, and Sheffield's baby, that placed the baby in dire danger.

I understand that Crystal Sheffield was involved in some kind of an accident at the Haleigh Bug Center in Satsuma, which involved Sheffield being hit in the face with a hatchet.

I understand the police were called to this incident.

I understand Kim Picazio was also called and showed up to the late night incident. I am told Kim Picazio covered up the fact that an accident took place with a hatchet, which split Sheffield open causing blood to spill all over the place - by suggesting she fell onto the hatchet. I understand Kim Picazio took measures to tell authorities that Sheffield had simply experienced a seizure - this was said to explain away Sheffield's use of pills not prescribed to her and resulting paranoia that caused a hatchet to be held as a weapon against menacing shadowy figures Sheffield believed she was seeing outside the window.

Sheffield's small baby was present and under Sheffield's care when this occurred and Picazio did not want the true facts of the event reaching the media because it would jeopardize her Florida DCF case to obtain physical custody of Ronald Cummings Jr. for her client.

I discussed this incident with Kim Picazio and received statements.

Reckless Disregard for Human Life

I have information through witnesses that Florida Attorney Kim Picazio participated in activities that involved a woman named Wayanne Krueger who was in Satsuma from out of state. Krueger was associated with Picazio's client, Crystal Sheffield. Krueger was very ill and was taking prescribed medicine. At some point Kim Picazio began to fear her client's connection to Krueger for purposes of public image.

I understand to be true that Kim Picazio's client, Crystal Sheffield, had been stealing pills from Krueger to support her addiction. I understand that Kim Picazio was involved in visiting a pharmacy and re-filling Krueger's prescription for medication for her (a prescription that should not have run out for a long time.)

As I understand it, at one point, Krueger became violently ill and requested medical attention (asked to be taken to hospital.) Kim Picazio denied her this medical attention for fear of bad press and plans were put underway to usher Krueger out of town.

As I understand it, Kim Picazio made Krueger, and others, sign a confidentiality agreement so they could not discuss the on-goings.

It was at some point decided that Krueger was an unacceptable liability to Sheffield's public image (because of the drugs) and it was necessary to get her away from Sheffield and the Haleigh Bug Center in Satsuma as to avoid media attention.

As I understand it, a clergyman named John Regan flashed his Chaplains badge to Krueger and caused her to believe he was law enforcement. She was then told she needed to leave town because she was in danger (or some kind of lie like that.) Krueger believed it and did as she was asked.

As I understand it, Krueger was driven to the airport by John Regan and she was so ill she had a temperature of 105 degrees – she was close to death yet was given no medical attention.

I discussed this incident with Kim Picazio and received statements.

Reckless Endangerment of a Child / Unethical Conduct

I have information through witnesses that Kim Picazio has first-hand knowledge that her client, Crystal Sheffield, was abusing medication that was not prescribed to her, while simultaneously pursuing physical custody of her 4 year-old son.

As I understand it, Kim Picazio has taken measures to keep this fact from coming out in the media or to Florida DCF as it would damage her case for physical custody of her client's other small child.

I understand that said drug use has caused Sheffield to have a car accident (widely reported by media) as well as the accident with the hatchet.

Ms. Picazio was told by several people that her client was abusing pills.

I discussed this matter with Kim Picazio and received statements.

Conflict of Interest / Unethical Conduct

I have information through witnesses and otherwise that Florida Attorney Kim Picazio engaged in an on-going sexual relationship with a man named Jeremiah Regan, 26 (son of Pastor John Regan who flashed his chaplains badge to Wayanne Krueger.)

I have information that Regan has also been romantically involved with Picazio's client, Crystal Sheffield, and it has affected Picazio's behavior toward Sheffield, because they were both having relations with the same man. I have information that Kim Picazio was taking extensive efforts to separate Sheffield from Regan out of jealousy.

The details of this are so extensive I will not attempt to tackle them right here. They are solicitous with sexual detail and I will not go into those unless asked.

I discussed this incident with Kim Picazio and received statements.

I discussed this incident with Michael Picazio, Kim Picazio's husband, and received statements.

Sexual Harassment

I have information that Kim Picazio employed Jeremiah Regan, and was also having an ongoing sexual relationship with him, constituting a sexual harassment issue.

I discussed this incident with Kim Picazio and received statements.

I discussed this incident with Michael Picazio, Kim Picazio's husband, and received statements.

Blackmail

I have information that Kim Picazio is blackmailing John Regan and Jeremiah Regan in regards to a "pillow talk" confession between Regan and Picazio regarding sexual abuse Jeremiah Regan suffered as a child.

Threats and Intimidation

I have information through witnesses and otherwise that Florida Attorney Kim Picazio is engaging in acts of intimidation and professional sabotage against parties who have knowledge of her illegal, unethical, and criminal behavior.

Other

It is a possibility that Florida Attorney Kim Picazio has been representing herself as the attorney of a person(s) to achieve unauthorized access and information.

It is a possibility that Florida Attorney Kim Picazio has mis-represented her relationship with someone as to create the appearance of an employer/employee relationship that does not exist, for purposes of media and information gathering. Likewise, she denies employee/employer relationships when they do exist.

I have information that Florida Attorney Kim Picazio has repeatedly given legal advice to people as she conducts her own 'private investigation' into the whereabouts of Haleigh Cummings. This legal advice actually resulted in a young lady signing away her custodial rights to a child, in a matter involving the Haleigh Cummings disappearance. The young lady is now devastated.

Enclosure: News Item, 5/30/09 email Staubs/Picazio/Holmseth, 5/28/09 Letter to Pedro Dijols.

Dated this 6/01/09 day of _____, _____.

Timothy C. Holmseth

Timothy C. Holmseth

Subscribed and sworn to before me, a Notary Public, this 1 day of June by Timothy C. Holmseth.

Lynne Marie Heffernan

Notary Public

My Commission Expires: 1-31-13

