

BEFORE THE INVESTIGATIVE PANEL OF THE
FLORIDA JUDICIAL QUALIFICATIONS COMMISSION
STATE OF FLORIDA

FILED
THOMAS D. HALL
2012 SEP -5 AM 9:32
CLERK SUPREME COURT

INQUIRY CONCERNING A
JUDGE NO. 12-27

CASE NO: SC12-521

RE: ANA M. PANDO
_____ /

RESPONDENT'S RESPONSE TO REQUEST FOR PRODUCTION

Respondent, Honorable Ana M. Pando, by and through her undersigned counsel, hereby responds to the Florida Judicial Qualifications Commission's Request for Production, dated June 25, 2012, and states:

REQUEST FOR PRODUCTION NO. 1:

All e-mails, including attachments, exchanged between you and Mark Cereceda, or anyone acting on his behalf, during the relevant time period.

RESPONSE:

There are no documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 2:

All other documents exchanged between you and Mark Cereceda, or anyone acting on his behalf, during the relevant time period.

RESPONSE:

There are no documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 3:

All e-mails, including attachments, exchanged between you and Roly Marante, or anyone acting on his behalf, during the relevant time period.

RESPONSE:

The attached e-mail is believed to have been previously furnished but, out of an abundance of caution, a copy has been attached hereto.

REQUEST FOR PRODUCTION NO. 4:

All other documents exchanged between you and Roly Marante, or anyone acting on his behalf, during the relevant time period.

RESPONSE:

There are no documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 5:

All e-mails, including attachments, exchanged between you and Lester Barreras, or anyone acting on his behalf, during the relevant time period.

RESPONSE:

There are no documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 6

All other documents exchanged between you and Lester Barreras, or anyone acting on his behalf, during the relevant time period.

RESPONSE:

There are no documents responsive to this Request.

REQUEST FOR PRODUCTION NO. 7:

Your personal cell phone records for the calendar years 2010, 2011, and 2012 reflecting any call or text message activity between you and Mark Cereceda.

RESPONSE

These documents have already been produced.

REQUEST FOR PRODUCTION NO. 8:

Your personal cell phone records for the calendar years 2010, 2011, and 2012 reflecting any call or text message activity between you and Roly Marante.

RESPONSE

These documents have already been produced.

REQUEST FOR PRODUCTION NO. 9:

Your personal cell phone records for the calendar years 2010, 2011, and 2012 reflecting any call or text message activity between you and Lester Barreras.

RESPONSE

These documents have already been produced.

REQUEST FOR PRODUCTION NO. 10:

All documents reflecting any gifts or loans of money to you from Mark Cereceda (other than contributions to your judicial campaigns) from 2002 – present.

RESPONSE:

There are no documents responsive to this Request.

Dated this 31st day of August, 2012.

Respectfully submitted,

PODHURST ORSECK, P.A.
Attorneys for Respondent
25 West Flagler Street
Suite 800
Miami, FL 33130
Phone: (305) 358-2800
Fax: (305) 358-2382

By: Robert C. Josefsberg by KWE
Robert C. Josefsberg, Esq.
Florida Bar No: 040856
rjosefsberg@podhurst.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been furnished by E-Mail and U.S. Mail as listed below on this 31st day of August, 2012, to the following:

Michael L. Schneider, Esq.
General Counsel
Judicial Qualifications Commission (JQC)
1110 Thomasville Road
Tallahassee, FL 32303
(850) 488-1581
Fax: (850) 922-6781
mschneider@floridajqc.com
Counsel for the Judicial Qualifications Commission

and

Lansing C. Scriven, Esq.
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Lansing.scriven@quarles.com
Special Counsel to the Judicial Qualifications Commission

and

Honorable Paul Backman
Florida Judicial Qualifications Commission
1110 Thomasville Road
Tallahassee, FL 32303
(850) 488-1581
Fax: (850) 922-6781
Pback64040@aol.com
Chair Hearing Panel, Judicial Qualifications Commission

and

John Beranek, Esq.
Ausley & McMullen
P.O. Box 391
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Counsel to the Hearing Panel, Judicial Qualifications Commission

Michael A. Catalano, Esq.
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Miami, FL 33125
mcatalanolaw@gmail.com
Co-Counsel for Respondent

Also, per Rules 9, and 10 of the Florida Judicial Qualifications Commission, all of our pleadings are being filed as follows:

Original and 9 copies to the clerk of the Florida Supreme Court by US Mail, Florida Supreme Court Clerk, 500 South Duval Street, Tallahassee, FL 32399-1927.

An electronic copy will be sent to the Clerk of the Court per Supreme Court Rule: AOSC04-84. Email to: e-file@flcourts.org

By: Robert C. Josefsberg by RWE
Robert C. Josefsberg, Esq.

MARY E. VALLEDOR

From: ROBERT C. JOSEFSBERG
Sent: Monday, July 09, 2012 9:10 PM
To: MARY E. VALLEDOR
Subject: Fwd: Reinstatement - Department of State
Attachments: Reinstatement of corporation.docx; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

From: Ani <pando325@aol.com>
Date: July 9, 2012 8:22:48 PM EDT
To: <rjosefsberg@podhurst.com>
Cc: <pando325@aol.com>
Subject: Fwd: Fw: Reinstatement - Department of State

The only email I found-not an email person!

----- Original message -----

Subject: Fw: Reinstatement - Department of State
From: "Mark Cereceda, DC" <mark@flwrc.com>
To: <pando325@aol.com> <pando325@aol.com>
CC:

Sent on the Sprint® Now Network from my BlackBerry®

From: Roly Marante <roly.marante@gmail.com>
Date: Tue, 11 Oct 2011 13:57:38 -0400
To: <pando325@aol.com>
Cc: Mark Cereceda, DC<mark@flwrc.com>
Subject: Reinstatement - Department of State

Dear Honorable Judge Pando,

It was a pleasure to be able to speak to you this afternoon. Pursuant to our conversation, attached is a copy of the letter requesting relief and assistance in the reinstatement of a Florida corporation.

As always, we appreciate your consideration with this most important matter. Please do not hesitate to contact me if I can be of further assistance to you.

Respectfully,

October 10, 2011

The Honorable Ana Maria Pando
Judge
Eleventh Judicial Circuit
Hialeah Courthouse
11 East 6th Street
Hialeah, FL 33010

The Honorable Judge Pando:

We respectfully request that you issue an order to the Florida Secretary of State, Division of Corporations to reinstate the following corporation:

Florida Wellness & Rehabilitation Center, Inc. #20-2834022 that was involuntarily closed by my accountant on May 4, 2011.

Unfortunately, we made a major administrative oversight in ordering this corporation to be involuntarily dissolved and appreciate your immediate relief to correct this action.

This order can be sent to the attention of: Jay Kassees, Division Director, Division of Corporations – Florida Secretary of State, The Clifton Building, 2661 Executive Center Circle, Tallahassee, FL 32399 – e-mail jkasses@dos.state.fl.us.

I thank you for your immediate consideration of this matter.

Respectfully,

Mark Cereceda
President