



September 12, 2020

Beaufort County Sheriff's Office
2001 Duke Street
Beaufort, South Carolina 29902

Attn.: Detective Seth Reynells

Re:	Suspect:	Jayne P. Hammond
	Suspect:	David Brett Hammond
	Victim:	Paul Geoffrey Hammond (DECEASED)
	Violations:	Murder for Financial Gain, Conspiracy to Commit Murder, Fraud, Forgery, Grand Theft, and Tax Evasion
Our Case No.:		19-01367-01

CONFIDENTIAL INVESTIGATIVE REPORT

My name is Joseph Dalu and I am a retired California police officer. I currently work as a consultant and private investigator, appropriately licensed and insured as required by California Department of Consumer Affairs, Bureau of Security & Investigative Services, (BSIS). I have over 35 years of investigative experience in both law enforcement and private sector.

I am submitting the following report for your review and request for further investigation into suspicious circumstances surrounding the sudden and unexpected death of Paul Geoffrey Hammond, a healthy and successful 69-year-old male. Mr. Hammond was a resident and business owner situated in a high-net-worth and prominent area of Florida, with additional residences in other cities in Florida and South Carolina.

I first became familiar with the following facts when I was retained by my client, Tara Marie Helman, to investigate circumstances surrounding the death of her father, Paul Geoffrey Hammond, on June 14, 2017. Ms. Helman also expressed concern related to her father's estate and his widowed spouse, Jayne P. Hammond, purportedly hiding and diverting assets exceeding \$60,000,000.

Based on our initial investigation, we found substantial evidence that clearly indicates Jayne P. Hammond, David Brett Hammond, David Rosenberg, and Barry Weiss willfully committed forgery, with specific intent to commit grand theft, fraud, and tax evasion in order to permanently deprive beneficiaries and state and federal governments from assets related to the death of Paul Geoffrey Hammond and his estate.

Hammond Death Investigation

As our investigation into the fraud and forgery developed, evidence began to reveal that Jayne P. Hammond may be responsible for the sudden death of her husband, Paul Geoffrey Hammond, on the morning of June 14, 2017. We believe the results from our investigation will demonstrate substantial evidence of premeditation and conspiracy to commit murder for financial gain.

This report includes notification, summary background, medical health history of Paul Geoffrey Hammond, reports, identified participants, parties, entities, and timeline of related events, followed by comments and recommendations.

All exhibits are outlined and attached with this report.

Our investigation uncovered criminal violations committed in both South Carolina and Florida for homicide, conspiracy to commit homicide, fraud, forgery, and tax invasion surrounding the death of Paul Geoffrey Hammond.

We believe the evidence implicates Jayne Hammond, the wife of Paul Hammond, as his murderer for financial gain. We also believe Jayne Hammond conspired with others to commit the aforementioned criminal violations.

With this investigation now complete, I graciously forward you my findings for your review with the belief there is sufficient evidence to request and/or require further investigation into the possible homicide of Paul Geoffrey Hammond by the hands of his widow, Jayne P. Hammond.

If you have any questions, please do not hesitate to reach out to me by phone or email. Thank you for your time and I look forward to your response.

NOTIFICATION

On December 17, 2018, I was contacted by client, Tara Helman, biological daughter of Paul Geoffrey Hammond, (heretofore referred to as "Geoff" for this report). Helman stated her father had suddenly died on June 14, 2017, which took her by surprise, as well as many others who were close to her father. His unexpected passing was surprising, in part, because Geoff recently had a complete and thorough medical exam on June 5, 2017, nine days prior to his sudden death. The coroner listed Mr. Hammond's cause of death as atherosclerotic cardiovascular disease.

According to Helman, she had asked her father's widow, Jayne P. Hammond, (referred to as "Jayne" in this report) for his medical history and cause of death. Ms. Helman reported Jayne abruptly refused to provide any information to her regarding Geoff's medical history, cause of death, or any other medical findings.

Helman indicated she was devastated at the lack of transparency regarding her father's death and medical history; however, she stated she was not surprised by Jayne's response. She said she never had a close relationship with her stepmother and provided many examples of how Jayne appeared to interfere with her and her father's relationship. We later found this description consistent throughout witness statements, with not only Helman's relationship with her father, but with their own personal or professional relationship with Geoff.

Helman went on to explain and provided several examples describing how Jayne mistreated her. The following two examples were common experiences described by witnesses of Jayne's malicious behavior. One incident described by Helman occurred when she was turning 12 years old. At that time, she left her Florida home in the summer of 1982 and went to stay with her father in New Jersey. In planning for Helman's birthday party with family and close friend, Deanna Mongello, Jayne had asked Helman what kind of cake she would like for her birthday. Helman replied to Jayne, "I like chocolate, vanilla, and ice-cream cake, as long as it is not carrot cake because I do not like carrot cake."

Helman stated not only did Jayne have a carrot cake to celebrate her 12th birthday, but she isolated Helman and had Helman, her guest Mongello, and the Hammond's housekeeper sit at a separate table outside and away from the rest of the guests and family that attended her birthday celebration. Helman said her father, aunts, uncles, and stepbrother David, sat inside the house.

The second example Helman provided came after the death of her father. She provided an email correspondence between her and Jayne. The tone of disdain and animosity in the email demonstrates Jayne's response to Helman.

On Jun 21, 2017, at 1:14 PM, Tara Helman - [REDACTED]

Hi Jayne,

Just wanted to reach out to you. I'm totally devastated about Dad as I know you are as well.

I wanted to ask if I could get a memento of his? I don't even know what that would be, just something that was special to him. I don't know if he told you about something he thought I would want someday. If not, I would appreciate you helping me figure that out.

Love,

Tara

Hammond Death Investigation

On Jun 28, 2017, at 9:32 PM, Jayne Hammond <[REDACTED]> wrote:

Tara, I'm totally devastated myself....I've been getting into bed for over 42 years with the man of my dreams...his side of the bed is very empty now.

I loved your father with all my being and I had a fairy tale marriage that I'm so thankful for...so I can't feel sad, because I had what few people ever have, I was very blessed.

I have his letterman sweater if you would like it, I'll part with it. I'll give it to David where you can pick it up as I'm leaving for SC Friday. I'm trying to finish up this jumbo move, not easy.

Jayne

Sent from my iPhone

On Jun 29, 2017, at 11:32 AM, Tara Helman <[REDACTED]> wrote:

Thank you.

N

From: Jayne Hammond <[REDACTED]>
Date: June 29, 2017 at 11:44:56 AM EDT
To: Tara Helman <[REDACTED]>
Subject: Re: Dad

It amazes me how unfeeling you are

Not even a word about "hi, how are you doing?" Only your phony tears at funeral and believe me, almost the whole family knew.
Forget the sweater, it means more to me that it ever would to you!

GOOD BYE

Sent from my iPhone

Note: On June 6 – 9 2019, we traveled to 12 Hanover Way, South Carolina, where Geoff Hammond resided at the time of his death. Using a suitable pretext, we contacted Real Estate Agent, Judy Flanagan and requested to tour the Hanover property. The interior was found primarily empty with a few pieces of small furniture and personal items left behind. The most upsetting personal item found was Geoff's previously described letterman sweater hanging in the master bedroom closet next to a couple pairs of shoes.

Hammond Death Investigation

As it appeared to Helman that she would get no cooperation from Jayne regarding information pertaining to her father's death, Helman filed a civil complaint against Jayne in November 2017.

On May 7, 2018, Helman subsequently obtained a court order to access her father's medical records for purposes of her own genetic history, health, and wellness.

With Jayne's resistance in being forthcoming with information of Geoff's death, inconsistent statements on how and where Geoff died, releasing information about his medical history, and denial of any personal items of Geoff's for his only biological child, Helman grew suspicious of about how her father died.

When Helman became our client, she requested that we investigate circumstances surrounding her father's death and the status of his financial estate. She expressed concern surrounding what appeared to be discrepancies related to her father's sudden death, his overall health history, and purported unhappiness with his marriage to Jayne.

Other discrepancies arose that raised questions about the cause of death, the 911 call, physical evidence postmortem, witness statements, review of medical reports, autopsy report, coroner's report, sheriff's report, and emergency medical technician reports.

After our initial meeting with Helman and after review of a variety of documents, we were retained to investigate the validity of Geoff Hammond's will and trust, as well as locate and verify any and all of her father's assets. The investigation then led to finding further evidence of suspicious circumstances surrounding her father's death as a possible homicide.

SUMMARY BACKGROUND

Paul Geoffrey Hammond was born August 15, 1947, to strict Catholic parents and raised in New Jersey. He was the first child of six that included brothers and sisters. He attended Mater Dei Catholic High School where he met his first wife, Carol Ann Mayo. After he graduated high school in 1965, he attended The Citadel College in South Carolina where he later reconnected with his high school acquaintance Mayo and subsequently dated her exclusively. In 1969, Geoff graduated The Citadel as **"Top Cadet"** in the nation.

According to Geoff's military service records, specifically the DD214, he enlisted into the United States Air Force on May 31, 1969.

On June 14, 1969, Geoff and Mayo married and Geoff immediately reported for duty in the Air Force, and the two moved to Arizona where Geoff attended pilot training. After a brief time in pilot training, Geoff received an honorable discharge, achieving the rank of Second Lieutenant, subsequent to a medical disability on January 16, 1970. It was reported Geoff's medical discharge from the Air Force caused him to suffer from depression due to his military career as a pilot abruptly coming to an end.

On June 14, 1970, Mayo gave birth to their only biological child, Tara Marie Hammond. Unfortunately, Geoff's battle with depression caused he and Mayo to separate and subsequently divorce on October 23, 1974, with Mayo having primary custody of Tara.

Around this same time, Geoff met Jayne Patrice Patterson while stopped at railroad crossing in New Jersey. On February 28, 1975, Geoff and Jayne married.

Jayne had been married and divorced twice before she met Geoff. Her first marriage at the age of 19 was to Stephen Malcolm Mandel on April 14, 1962, while living in Los Angeles California. The two had a son, David H. Mandel, born May 30, 1963. Mandel and Jayne separated and divorced prior to their son being born.

According to Stephen Mandel during a telephonic interview in February of 2019, he stated he was unaware Jayne was pregnant with their son when they divorced. He revealed it was not until after their divorce that Jayne mentioned giving birth to their son. Mandel went on to say he never heard much from Jayne after that, nor did he have a relationship with his son, David. He stated if David was his son, he was never asked, nor did he give anyone permission to formally adopt his son.

Note: Witnesses allege Jayne told different stories to Geoff's family, extended family, and friends about David's father. The following are explanations Jayne provided to different people.

- ***David's father had been admitted to a mental-health facility***
- ***David's father had died shortly after David's birth***
- ***David's father allowed Geoff to legally adopt him***

Jayne's second marriage was to Donald Arthur Patterson in Chicago, Illinois, in 1965. During this marriage, Jayne gave birth to a second son, Todd Lawrence Patterson, on August 10, 1968. Todd was the only product of that union. Donald and Jayne later divorced in 1971.

As noted earlier in this report, Jayne met Geoff in October 1974. They married in New Jersey on February 28, 1975, where they resided until 1999. Geoff's four-month courtship with Jayne surprised his family and friends. It was reported Geoff's mother pleaded with him to reconsider marrying Jayne because he barely knew anything about her.

On August 8, 1981, Geoff's father, Donald Hammond, died. Geoff was 34 years old at that time and he became the leader of the family and shouldered the responsibilities for his siblings. Geoff became the main financial source, as well as the emotional and moral support, and spiritual leader for this Catholic family.

With Geoff's growing success as an executive and entrepreneur of several successful businesses, he built a stoic, dignified, and judicious reputation that not only demanded respect but was well-deserved. He was described to have had a consistent and recognizable strong moral compass.

These strong attributes contributed to the development of Consolidated Services Incorporated, (CSI). He took CSI from New Jersey to Fort Lauderdale, Florida, sometime around 1999 to 2003. As Geoff's business successes grew, so did his assets. With both financial and tangible assets,

Geoff was frequently described as unstoppable, somewhat intimidating, but extremely generous, especially with those close to him, and most particularly, his family, which included his siblings.

Although divorced from his first wife, Carol Mayo Miller, Geoff had a consistent, ever-developing relationship with their daughter, Tara. Geoff contributed to Tara's well-being, as most divorced fathers would be expected. He was required to help financially per his divorce agreement with Mayo Miller, but according to witness statements, Geoff seemed to agree at first and stay committed to his financial and parental obligations to help raise Tara, but his efforts were often curtailed by Jayne.

This behavior of both Geoff and Jayne instigated talk among Geoff's siblings, Tara, and close friends. They wondered aloud how he could allow Jayne to manipulate and interfere in his personal and professional relationships. The interference by Jayne was noticed by many throughout his 42 years of marriage to Jayne, but it became more apparent things were not always blissful during the last few years of his life.

Our investigation revealed Geoff was particularly unhappy in his marriage with Jayne beginning around 2014. Geoff's inner circle of business colleagues, family, and friends began to notice tension in Geoff's relationship with Jayne. According to witnesses, Jayne had a substance abuse problem with alcohol and prescription medication. It was said Jayne would deliberately harm herself so she could be prescribed opioids.

After interviewing multiple sources, the general feelings expressed by many that knew them as a couple described Jayne as having control issues, noting she had to manage Geoff's daily calendar. She was described as maliciously evil, pretentious, and selfish. Notably, every witness we contacted had expressed fear of Jayne and some feared that if Jayne knew they were providing information about her, Jayne would harm them.

Witness statements also indicated Geoff grew tired of Jayne's constant restrictive control of his daily activities, including influence in the business, interfering with the employment and termination of workers, alienating friends, and family from him, and causing unnecessary drama. This became more evident in the last year and a half of his life as he increasingly had to repair or clarify negative situations that Jayne had created or destroyed wherever and whenever she was involved.

On a lunch date with his daughter, Geoff confided to Tara that his marriage to Jayne was **"tenuous"** and that for the past few years their love had changed and was not the same. Tara stated he told her that he had to conceal his relationship with her because Jayne would get angry and upset with him, which caused numerous fights between them. Geoff revealed to Tara that Jayne expressed extreme hatred towards her because Tara was taking Geoff's time and she could not come between the love he had for Tara.

As Geoff typically helped others, there was no question he would not do the same, if not more, for his daughter. He employed Tara at CSI when it was still established in New Jersey and was excited about her working in the business. However, Jayne created unnecessary tension between Tara and her father that affected their dynamic relationship and caused Tara to resign her employment with CSI in less than a year. This shift caused Tara to move back to Florida.

Other witness statements will show that people within CSI observed tension between Geoff and Jayne increase during the last six months of his life. Jayne's consistent demand for Geoff's attention, control of his comings and goings, and her restricting Geoff from having a relationship with anyone other than her, even a platonic one, caused more undue stress.

PAUL GEOFFREY HAMMOND'S MEDICAL HEALTH SUMMARY

Geoff Hammond was considered to be a well-nourished, physically fit, strong, and healthy 69-year-old man. Geoff had no known medical conditions or physical restrictions, and generally consumed a healthy diet and remained active on a daily basis. According to family and friends, Geoff was very conscientious about his health, diet, and would not avoid getting regular checkups.

Geoff was not known to smoke or drink, and his weight was established as appropriate for his height and age. Additionally, and most specifically, Geoff had no family history of coronary artery disease.

Shortly around March or April of 2017, Geoff mentioned he began to experience an unusual increase in fatigue. In June of 2017, his fatigue became chronic and extreme, so he scheduled a medical appointment with his treating physician, Gaston Perez, M.D.

On June 5, 2017, Dr. Perez conducted a complete physical and ran a blood panel on Geoff in an attempt to find the cause of his recent increase in chronic fatigue. According to Geoff's medical history, his previous visit to Dr. Perez was on February 16, 2017, at which time he was prescribed Crestor as a precautionary measure to manage his cholesterol for approximately thirty days. It was just a short time later when Geoff began to experience fatigue.

According to records of Geoff's last two medical appointments with Dr. Perez, he denied having any other health issues or concerns, including chest pain, shortness of breath, or gastrointestinal issues such as nausea or heartburn. His blood pressure was considered within the normal range. Other bloodwork was performed to check his cholesterol levels and check for diabetes, lupus, and celiac disease. Additional tests were conducted of his thyroid and testosterone levels in order to rule out cause for fatigue. All of Geoff's bloodwork results were found to be normal and without reason for concern.

Geoff's sudden and unexpected death on June 14, 2017, was just nine days after his complete physical and EKG, and only eight days after all his bloodwork and test results from his physical examination performed by Dr. Perez. The doctor considered Geoff to be completely healthy with no concerns.

Following Geoff's death, Dr. Perez was reported to have informed the Beaufort County Coroner, David Ott, that all of Geoff's bloodwork came back in good order. Dr. Perez said there was no explanation as to what caused Geoff's fatigue, and justly, Dr. Perez did not recommend additional testing or visits unless his symptoms worsened.

Note: According to South Carolina statute, either the physician by which the decedent is cared for or the medical examiner could sign a decedent's death certificate. In this case involving Paul Geoffrey Hammond, his death certificate was certified by Coroner J. Edward Allen on June 16, 2017. However, it also indicated that Deputy Coroner, Deborah A. Youmans, pronounced the death of Paul Geoffrey Hammond on June 14, 2017, at 10:33 a.m. To our knowledge, Ms. Youmans was not at the scene at the time of death.

It is unknown as to why Dr. Perez, Paul Geoffrey Hammond's treating physician, was not asked to sign Mr. Hammond's death certificate.

Physical Examination and Blood-Panel Findings

Taking a holistic approach and overall view to Geoff's health and test results and contrasting this to his toxicology report postmortem, no major concerns were found, except for an unexplained increase in fatigue. Prior to his death, he was a healthy 69-year-old adult male. Although a slight elevation in eosinophils was found in his blood-test results, this finding did not concern Dr. Perez, nor did it concern three independent medical experts who reviewed Geoff's medical report.

An elevated eosinophil count could indicate three possible areas of concern, such as a parasitic infection, an allergic reaction, or cancer. Geoff was not diagnosed with a parasitic infection or cancer, so it may be likely he was experiencing an allergic reaction to something. Common allergic reactions may be due to medications, drugs, or toxins.

Although a toxicology and blood panel were conducted postmortem, the lab did not nor was there a request or immediate concern to test for specifics, such as toxins, poisons, or prescription medications, with the exception of the ones most commonly abused, or if there was cause to suspect foul play.

However, an alarming note in the medical examiner report postmortem indicated there was an undetermined "pink tan" fluid found in Geoff's stomach. It also indicated no food was found in his stomach, particularly his common morning consumption of breakfast and coffee.

Note: Geoff was known to be a consistent early morning riser. He would typically rise around 6:30 to 7:30 a.m. daily, consume his morning coffee, then shower, dress, prepare and eat breakfast before he would start his day. It was also typical for Geoff to prepare all meals for himself and Jayne unless they dined out. According to witness and family members, Jayne did not cook or prepare meals.

FIRST RESPONDER REPORTS **REVIEWS & DISCREPANCIES**

Note: When reviewing any type of First Responder report, police, fire, etc., it is important to understand that these reports are typically for documentation, verification, identification of responding personnel, and time of the specific incident and other times centered around that incident. Most information should be accurate, clear, concise, and brief. Most documented

times, although accurate, could also be approximated. Witness statements should also be considered accurate but could be similar to or paraphrased by the writer of the report.

The following reports are in response to a medical aid call for service at 12 Hanover Way, Bluffton, SC 29910, an upscale, private, gated community, identified as the Colleton River Club.

The 911 call was called in by Jayne P. Hammond regarding finding her husband, Paul Geoffrey “Geoff” Hammond unconscious and unresponsive lying on the floor inside their home office.

Geoff Hammond was a 69-year-old healthy adult male, allegedly found in a prone position in his boxer shorts. The 911 call was documented at 10:09:01 and lasted approximately 7 minutes and 38 seconds.



Home Office where Geoff was allegedly found deceased by Jayne

Bluffton Town Fire Department Fire Incident Report

According to Bluffton Town Fire Department, they were first to arrive on scene at 10:16:22 a.m. at the above-indicated address. Six fire personnel were identified on scene. This incident report indicates there was an injury sustained to the victim without further description of the injury or where the victim sustained the injury. The report noted no CPR or other lifesaving methods were performed prior to their arrival, either by the victim’s wife, Jayne Hammond, or by the Colleton River Club Security personnel.

Fire personnel were greeted by the Colleton River Security Chief, Mike Tuten, who told them Geoff was located in the upstairs part of the home. Fire personnel located the victim, later identified as Paul Geoffrey Hammond, on the home office floor, lying face down and warm to the touch. They discovered Geoff was in asystole, and there was no shockable rhythm, so they began CPR until 10:22 a.m. At that time, fire personnel indicated they called medical control at Hilton Head Hospital and were advised to stop CPR at 10:23 a.m.

**Beaufort County Emergency Medical Services
EMS Report**

According to the Beaufort County Emergency Medical Services incident report, two EMS personnel arrived on scene at 10:24 a.m. and took over from the fire department personnel's lifesaving measures. EMS Paramedics indicated Geoff was not breathing, had no pulse, appeared asystolic and unresponsive. They drilled an intraosseous catheter into his right tibia to administer epinephrine as there were no visible veins on Geoff. After continuous CPR and two rounds of epinephrine, they called medical control at 10:33 a.m. to report his condition and were told to cease efforts. Geoff was declared dead at 10:33 am.

The paramedic report indicates they observed cyanosis present from clavicles superior through face and head. This medical observation appeared to contradict other visible findings on the same incident report. Directly across from this specific objective finding, it indicated the absence of the following symptomatic descriptions:

- Cold
- Cyanotic
- Diaphoresis
- Hot
- Jaundiced
- Lividity
- Mottled
- Pale

According to Jayne's statement to EMS, she heard a cough coming from the upper level of the home but did not hear anything else. She proceeded to see if Geoff was all right. When she reached the upper-level home office, she alleged she found Geoff laying on his stomach and she was unable to roll him over to perform CPR. She also told EMS personnel that Geoff had no pre-existing medical issues, except high cholesterol, and he had not complained of anything out of the ordinary that day.

After review of these reports, there appears to be a significant amount of time difference between the fire department and EMS reports. Most significantly, the fire department's report indicated they called Hilton Head Regional Hospital at 10:22 a.m. and spoke to the on-call physician and provided Geoff's current status. According to the fire department's report, they were instructed to stop lifesaving measures, CPR.

However, according to the EMS report, they telephoned Hilton Head Regional Hospital at 10:33 a.m. and spoke to Emergency Room (ER) Physician Pruitt. They advised Pruitt of Geoff's current condition and were instructed to cease CPR and declare Geoff deceased at 10:33 a.m.

This ten-minute discrepancy between two different agencies apparently showed they stopped lifesaving measures at two different times on the same victim/patient. The EMS report was the only agency to positively identify one of possibly two ER physicians.

With this information there appeared to be two separate calls ten minutes apart to Hilton Head Regional Hospital providing Geoff's vital signs. In both alleged separate calls, two different agencies were instructed to cease all lifesaving measures, with two times of death, one at 10:23 a.m. and the second at 10:33 a.m.

Medical University of South Carolina MUSC Autopsy Findings

According to the MUSC Autopsy and Toxicology report, the autopsy of Geoff Hammond was conducted by pathologist, Dr. Nicholas Batalis, on June 15, 2017. Dr. Batalis indicated he spoke to Beaufort County Deputy Coroner, Mr. David Ott, and learned that Geoff had collapsed on the morning of June 14, 2017, and his wife, Jayne Hammond immediately notified authorities. However, according to Dr. Batalis, Geoff was subsequently transported to a local hospital where he was later pronounced dead.

Dr. Batalis's report called to question whether Geoff was pronounced dead at his house in Bluffton or transported to Hilton Head Regional Hospital where advanced lifesaving measures were conducted, with negative results, and later pronounced dead at the hospital.

Dr. Batalis also indicated in his report that there was 20 ml of pink tan fluid contained in Geoff's stomach. It did not appear that Dr. Batalis conducted or requested further testing of the descriptive 20 ml of pink tan fluid to better identify the origin of that fluid.

According to reports, witness statements, and Dr. Batalis's autopsy findings, there was evidence of injury to Geoff over several areas of his body identified as subscapular hemorrhages on the scalp and a single focus hemorrhage on Geoff's tongue. Dr. Batalis did not provide further information or an explanation as to what could have caused these specific injuries.

Furthermore, Dr. Batalis found no evidence of a "heart attack" or "heart damage," though evidence of blockages were found, one in Geoff's heart valve identified as a 75% blockage, and a separate blockage identified at 25%. There was no evidence of blood clots or pulmonary embolism or aneurysm.

According to expert reports, these two blockages would not have caused Geoff to suffer a cardiac arrest; a cardiac arrest was caused by a deadly arrhythmia likely caused by blunt force trauma, excited delirium, poison, or other contributing factors.

Evidence of lividity was noted by Dr. Batalis on the posterior surfaces of Geoff's body and there were no other apparent diseases or health issues found or identified.

According to the death certificate, Geoff's time of death was documented at 10:33 a.m. when lifesaving efforts were terminated.

Due to the discrepancies found in medical reports and statements allegedly made by Geoff's wife Jayne, and whether Geoff was or was not transported to a local hospital for further evaluation, the actual time of death could and should have been determined with more accuracy by taking

the temperature of his internal organs or testing of the vitreous fluid as part of the autopsy examination.

Beaufort County Sheriff's Office Sheriff's Report

According to reports, Deputy Garland Cox and J. Stuckey responded to a service call regarding a request for medical aid at 12 Hanover Way, Bluffton. They arrived on scene subsequent to medical emergency personnel. Cox interviewed Jayne Hammond who stated that she awoke at 9:30 a.m. to her husband, Geoff Hammond, telling her he was going to get some work done in their home office.

Jayne then claimed that she showered, then went downstairs and ate breakfast. According to Jayne, she alleged that at about 10:05 a.m. she thought she heard Geoff cough and then fall, making noise. She stated she went upstairs and found him unresponsive lying on his stomach on the floor of their home office. Jayne claimed she attempted to roll him over onto his back but was unable as he was too heavy for her to move. Jayne stated she called 911 and awaited arrival of EMS personnel.

According to Cox, he did not see anything suspicious, but noted that he observed blood emanating from Geoff's nose.

Beaufort County Coroner's Report

Beaufort County Deputy Coroner David Ott arrived on the scene and took responsibility over from Deputy Cox. Ott conducted his own interview and obtained a statement from Jayne Hammond. Jayne stated she and Geoff got up together and for some unknown reason, he burped very loudly when he first got up, claiming he had never done that before.

At 9:45 a.m., Geoff told her he was going upstairs to his study to crunch numbers. At about 10:05 a.m., she heard a loud sound like something falling. Upon going upstairs, she found him lying face down and unresponsive. She called 911 at 10:09 a.m. and alleged she attempted to roll Geoff over to administer CPR but was unable to do so due to his weight.

Jayne voluntarily stated Geoff never complained of chest pain or felt tired leading up to his death. Contrary to information received from Geoff's medical records, it appeared Jayne deliberately withheld information that Geoff experienced extreme fatigue and sought medical attention to figure out why he was experiencing an increasing level of fatigue.

Ott's report indicated he conducted a visual inspection of the area where Geoff was found. According to Jayne's statement, she declared Geoff allegedly said he was going to do some work in his office, but Ott found no evidence of someone doing work, whether on the computer screen or seeing written documents or files. The report indicated the office area was clean and undisturbed.

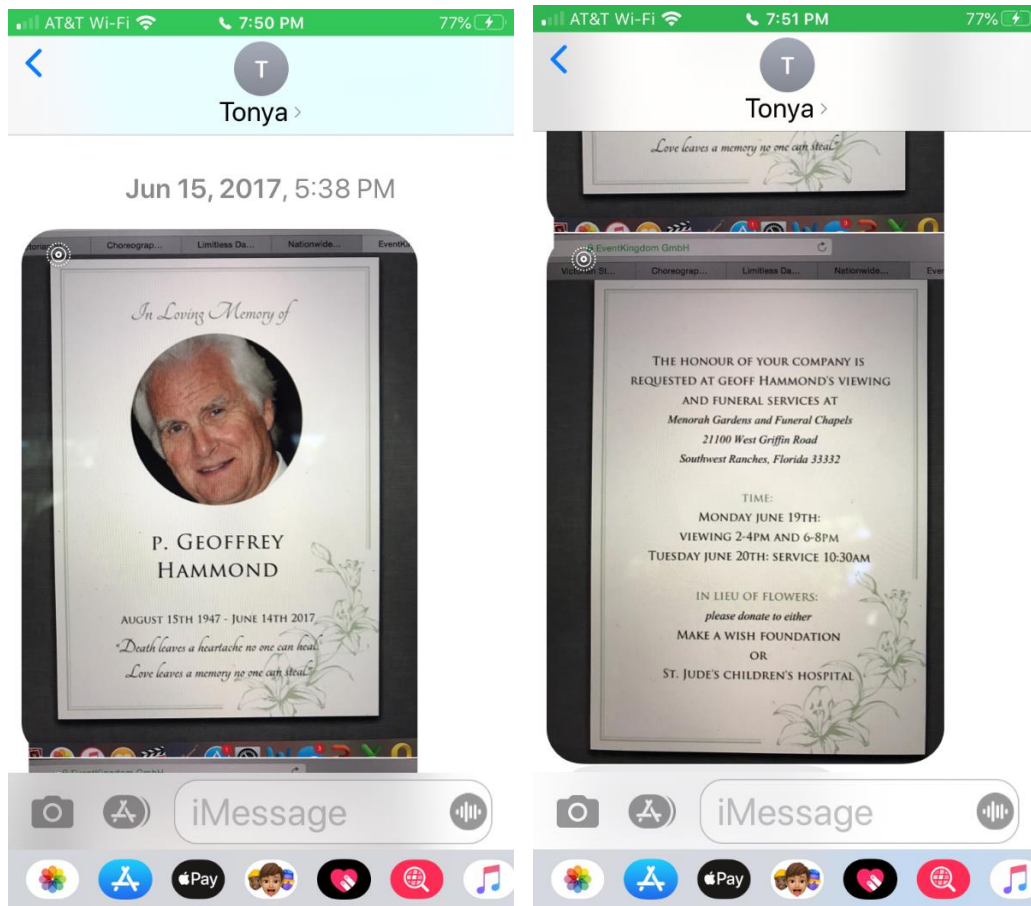
Based on the deputy's incident report and Ott's coroner's report, Jayne provided two different statements regarding the events surrounding this incident.

- Jayne stated to Deputy Cox she woke up at approximately **9:30 a.m.**
- Jayne stated to Investigator Ott that she woke up together with her husband, Geoff, at approximately **7:30 a.m.** (Jayne provided a statement to Cox prior to Ott).
- Jayne omitted information to Cox that Geoff allegedly burped loudly when he woke up.
- Jayne provided information to the deputy coroner that Geoff allegedly let out a loud burp when he woke up, claiming he had never done that before.
- Jayne provided a critical statement to Deputy Cox that upon her waking up in the morning at 9:30 a.m., she showered and then went "**DOWNSTAIRS**" to eat breakfast. This statement appears to be an admission and timing contradiction in opposition to when she allegedly found Geoff unresponsive.
- According to Ott's report, taken shortly after Geoff was pronounced dead, it's documented that Jayne provided the Menorah Gardens Funeral Home as final destination for Geoff's body, as if Geoff's death were expected or she had made prior arrangements.

Note: This investigator must mention it was not until after June 15, 2017, that David Rosenberg, Jayne's personal jeweler in Florida, was designated to make funeral arrangements. Rosenberg is of Jewish faith and had connections at Menorah Gardens Funeral Home. With Rosenberg's alleged connections, evidence shows that Geoff's Memorial Card & Funeral Notification was finalized and printed by June 15, 2017 at 5:38 p.m. Eastern Standard Time.

Hammond Death Investigation

The following screen shot was generated from a text message sent by Tonya Hammond, David Hammond's wife to Tara Helman.



Note: 12 Hanover Way is a tri-level, single-family, Victorian-style residence. There is a basement and a finished attic above the third floor. The main living area, kitchen, and master bedroom are located on the ground level, above the basement and garage. Jayne's statement that she woke up, showered, and then went downstairs to eat breakfast appears to be inconsistent to what Jayne alleged and provided as a timeline of events on the morning Geoff died. Moreover, if the master bedroom and bath were on the same level as the kitchen, a question to ask would be why Jayne would state that after her shower she went downstairs to eat breakfast.

Note: According to witness statements, Jayne rarely went upstairs, if at all, due to alleged complications with her knees and legs.

The aforementioned statement by Jayne appeared to be inconsistent with the daily routine of Geoff and Jayne. It also appeared to contradict what Geoff was allegedly scheduled to do with regard to a 9:00 a.m. business call with his adopted son, David B. Hammond, the morning of June 14, 2017. According to witness statements, Geoff did not make his 9:00 a.m. phone call, which was something Geoff would not overlook. If Geoff was scheduled for a call with David at 9:00

Hammond Death Investigation

a.m., there were no records showing David made any attempt to call Geoff and follow up, per their alleged scheduled phone call.

DECEDENT/VICTIM**Paul Geoffrey Hammond**

DOB: August 15, 1947

DOD: June 14, 2017



Cause of Death – Geoff suffered from a cardiac arrest causing death. However, according to experts, his cardiac arrest was more likely caused as a result of some type of catastrophic trauma or possibly poison.

PAUL GEOFFREY HAMMOND ESTATE & ASSETS**Business**

- Consolidated Services Incorporated (CSI) is a privately owned business with an estimated net worth of \$35,000,000 to \$50,000,000. It is registered as an S corporation.

Real Property

- 373 Mizner Lake Estates Drive – Boca Raton, FL 33432 - \$4.6 million
- 12 Hanover Way – Bluffton, SC 29910 - \$9.8 million
- 333 Las Olas Way, Unit 1504 – Fort Lauderdale, FL 33301 - \$1.1 million
- 14 Gilded Street – Bluffton, SC 29910 Vacant Lot - Approximately \$200,000
- 37 Red Knot Road – Bluffton, SC 29910 Single-family residence built at time of death - \$1.2 million

Vessels:

- 2000 73-ft. Feretti War Horse ID #XFA72F26A000 Hull #72F26 CF #1095556
- 2012 37-ft. Grady White ID #TLHC402E213 Hull #HC402 CF #42215
- 2016 Yamaha Model F50LB Serial #6C1L1068064
- 2017 Avon Model SS380D Serial #AVBS38ACG617

Vehicles:

- | | |
|--|----------------|
| • 2008 Black Ferrari – VIN ZFFJB54A080158642 | MSRP \$263,500 |
| • 2006 Maroon Maserati – VIN VAMCE39A560021670 | MSRP \$105,000 |
| • 2005 Red Harley Davidson – VIN 1HD1PKE125Y952339 | MSRP Unknown |
| • 2005 Black Harley Davidson – VIN 1HD1FHW115Y708105 | MSRP Unknown |
| • 2008 Black Honda G1800 – VIN 1HHFSC47F68A700652 | MSRP Unknown |
| • 1999 Whitley Utility Trailer – VIN 4LXBAB033XH001723 | MSRP Unknown |
| • 2004 Non-Commercial Trailer – VIN 4G44S08154A000630 | MSRP Unknown |

Wealth Portfolio

- Miscellaneous Investments
- Life Insurance Policy(s) USSA
- Brokerage Account(s) Merrill Lynch
- Individual Retirement Account (IRA)
- Financial Institution(s) Personal Accounts
- AT&T Pension

Miscellaneous Personal Property:

- Firearms
- Designer Watches
- Jewelry
- Golf Clubs
- Expensive Wine and Cigar Collection
- Expensive Art – Estimated Value Over \$4,000,000

WITNESS STATEMENTS & INVESTIGATION

Our investigation consisted of obtaining witness statements; retrieving court documents, motor vehicle reports, and property reports; performing database research; and searching all available resources to the public. We contacted and utilized forensic experts to assist with examinations of questionable documents and medical reports.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

I telephoned [REDACTED] on a couple of occasions in 2019 to talk about her relationship with Geoff and Jayne Hammond. [REDACTED]

[REDACTED] Immediately, she made it clear she would rather not talk to me, but she stated she loved Geoff and was always taken care of by him.

[REDACTED]

We contacted [REDACTED] by phone, and she shared the following information. [REDACTED]

[REDACTED]
She described her relationship with Geoff as being like family. She said Geoff was exceedingly

kind, polite, and respectful. [REDACTED], Geoff always spoke to her with the utmost respect and demeanor.

When she described her relationship with Jayne, she said Jayne was consistently disrespectful, condescending, and always talked down to her and treated her like a dog. She reported she strongly believed that Jayne practiced witchcraft because Jayne had bizarre objects spread throughout the home. She described some of these objects as small pieces of bones, as well as other small objects that were similarly used by voodooists.

[REDACTED] was very hesitant to speak with me about Jayne because she stated she feared Jayne would seek revenge and kill her. During our conversation, [REDACTED] appeared to carefully select her words when describing things, she had witnessed while working for the Hammonds. She said she understood all marriages had ups and downs, but said she felt the last couple of years between Geoff and Jayne the tension increased significantly, and Geoff appeared to be unhappy around Jayne.

[REDACTED] witnessed frequent fighting and arguing between Jayne and Geoff [REDACTED]. She said it became extremely uncomfortable for her as she felt that Jayne appeared to persist, argue, and yell at Geoff. Geoff would go in another room or area of the house and Jayne would follow him to continue arguing.

[REDACTED] reported Jayne would consistently say mean things to her when no one else was around, put her down, and make her feel unappreciated.

[REDACTED]

[REDACTED]

[REDACTED] recounted the moment she first learned of Geoff's death. She said she was called by Jayne on the day of his death and Jayne asked if she was standing or sitting. Then Jayne blurted out and stated very matter of fact, "Geoff is dead!" [REDACTED] reported she was in shock as Jayne stated Geoff was "Working out on his exercise bike and collapsed and I found him on the floor next to the bike." She said Jayne then terminated the phone call. [REDACTED] remarked she was incredibly sad upon hearing about the death of Geoff. She said she wanted to attend his wake or funeral but was denied by Jayne. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] sadly stated when she found out that Todd was living close to Geoff in South Carolina, she had a feeling Todd had something to do with Geoff's death, especially since she was told by David that Geoff had a gash on his head when he died.

A questionable codicil, dated June 11, 2009, was allegedly created by Geoff in preparation for a family European trip for two weeks. The codicil displayed a witness signature by [REDACTED] along with Geoff's signature. [REDACTED] was provided and looked at an email copy of the codicil and examined her alleged signature. She confirmed the signature appeared to be hers but could not recall signing it. She also exclaimed that Geoff had told her confidentially she was included in his will. The Codicil is attached with this report and marked as: (Exhibit A)

Note: When reviewing the codicil, misspelled words were found, most notably, Geoff's full name. In one area the word "codicil" was misspelled three times. According to witness statements, examination of the original codicil indicated Geoff's signature appeared to be authentic. However, evidence supports Jayne created the questionable codicil due to the misspellings throughout.

During the telephonic interview with [REDACTED], her most disturbing comment came from her recollection of an overheard conversation between Jayne and her son, David. [REDACTED] said their conversation occurred on the evening of Geoff's funeral. [REDACTED] said Jayne made a point to say Geoff's daughter did not attend Geoff's funeral; however, [REDACTED] later learned that that was a lie. She also said that Jayne acted normal, with no emotion or sadness, when she returned home from the funeral. Jayne was as she always was, curt and condescending. [REDACTED]

[REDACTED] recalled she later overheard Jayne and David talking in another room stating something to the effect of, "We have to change the will."

[REDACTED] said she heard Jayne make other ominous statements after Geoff's funeral. Another statement that stood out to [REDACTED] was, "I am not going to stay and grow old by myself. No way!" Other unsolicited comments [REDACTED] heard Jayne say were generally rude and pertaining to others. [REDACTED]

Her recounting of her history with the family appeared to come from a place of honesty, especially recalling her statement expressing a tremendous amount of fear that Jayne would harm her if she learned that [REDACTED] spoke to this investigator.

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

██████████ said that aside from Geoff's intelligence, his marriage to Jayne was something different. He described Jayne as having some bizarre and unusual control over Geoff. He and Geoff could be set on a specific course of business; however, if that course of business took Geoff's time away from Jayne or posed any threat to Jayne of whatever her distorted perception was of a threat, Geoff appeared to immediately change the course or direction of what was originally a well-thought-out plan, and it was terminated. In every scenario like this, ██████████ said that Jayne influenced, distorted, or pressured Geoff to change the business direction.

He explained that Geoff was influenced to hire Jayne's two sons, Todd Patterson, and David Hammond. [REDACTED] indicated David was allegedly adopted by Geoff when he was a young teen. [REDACTED] reported it was discovered that Patterson embezzled hundreds of thousands of dollars from CSI and he was subsequently terminated. Through Jayne's persistence, Geoff later hired Patterson back, but it was not too long after that that Patterson was again caught embezzling thousands of dollars and he was terminated without further opportunity at CSI.

According to ██████████ when it came to Geoff's adopted son, David Hammond, this relationship was a complete nightmare and headache for Geoff. He said Jayne appeared to favor David and allowed him to recklessly expose the company to liability. David was described as a walking liability and habitual liar. David was accused of numerous sexual harassment complaints by female employees of CSI. It was known that David had multiple affairs and used company funds to support his nefarious activities. David's described activities were a constant battleground for Geoff and Jayne, but to everyone's surprise, Geoff succumbed to Jayne's demand to keep David employed by CSI.

It appeared to [REDACTED] that in every instance Geoff went against his better judgement to terminate David. [REDACTED] said Geoff felt David was irresponsible, inept, and had extremely poor decision-making skills. According to [REDACTED], Geoff asked former employee, Dan Brooke, if he would come back to work to specifically "babysit" David because he could not be trusted and considered David a "fuck up."

[REDACTED] there was one specific incident he wanted to share with this investigator. Because [REDACTED] was still very much professionally conversing with Geoff [REDACTED], it was brought to his attention that a week before Geoff died, his adopted son, David, was allegedly given the responsibility to make a huge business decision to terminate a long business relationship with one financial institution and transfer all business accounts to another bank. [REDACTED] was adamant that this would not and could not have been known by or approved by Geoff. The fact that this was an extreme change, particularly for a large corporation, it was not something that would not be discussed without input from the board of directors. It was also something that could be complicated to handle, especially around the legal and financial paperwork required to pull this off.

[REDACTED] emphasized that Geoff would not have had confidence in David to make such an important decision nor conduct this transfer or make this type of change that could affect numerous branches of a large corporation. [REDACTED] stated this huge decision, made improperly, caused payroll checks to bounce not just once, but twice when employees attempted to deposit their payroll checks.

[REDACTED] Geoff was completely unaware of what was transpiring, and before this transaction could have been presented to Geoff, he suddenly died.

He reported the most unusual experience he had encountered involving Jayne and her son, David,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] He stated this brief encounter with David was immediately followed up by a phone call from Jayne Hammond before [REDACTED] even had time to enter his car and depart from the parking lot. [REDACTED] stated that when answered the phone, Jayne's first questions after her greeting, was, [REDACTED] *you know that Geoff and I never fought; right?*

██████████ said that Jayne had no other comment or reason for her call and felt that his encounter with David was not by chance. ██████████ immediately called ██████████ and shared this information ██████████

██████████ added that not only did Jayne's phone call have impeccable timing, but it was as if Jayne was trying to put the idea in his head that she and Geoff did not fight. ██████████ said he scoffed at that comment, because he said he saw Geoff and Jayne frequently argue and fight ██████████

██████████
██████████
██████████
██████████ ██████████
██████████
██████████ ██████████
██████████

██████████ He was contacted by phone and spoke to me about his relationship with Geoff and Jayne. The following is a summary of his telephonic interview.

██████████ stated that he knew and worked for Geoff and Jayne for a couple of years, but that he primarily dealt with Geoff for all business matters ██████████. He had little contact with Jayne but shared his thoughts and respect for Geoff. He described Geoff as confident, generous, nice, and down to earth. Geoff talked to ██████████ as an equal ██████████

██████████ stated whenever he met with Geoff ██████████ it was always early in the morning, around 7:00 a.m., as he described Geoff as an early riser. However, he described Jayne as a person who sleeps in and would not "surface" until mid-morning, sometime between 9:00 a.m. and 10:00 a.m.

During the interview, ██████████ maintained diplomacy, but later came out stating, "Jayne was just a bitch!" He apologized for using such a colorful description and continued to be respectful when talking to me.

██████████ recalled the first time he learned of Geoff's passing was during a phone call he received from Jayne. In that discussion, Jayne informed him that Geoff suffered from a brain aneurysm and that the police were conducting an autopsy to make sure she did not "kill" Geoff. He said he was immediately taken aback by Jayne's statement and described it as odd and an unusual comment to make voluntarily. ██████████ questioned, "Who says things like that?"

██████████ stated he had many casual conversations with Geoff about life. ██████████ definitely recalled Geoff talking about his love for his daughter, but ██████████ could not recall Geoff's daughter's name. He described Geoff as, "... a picture of health and in better shape than me, especially for being much older than me. He was healthy as a horse!"

█████ remarked it was most concerning that Jayne expressed no emotion, especially sadness, and acted as if nothing happened. He said this discussion with Jayne was prior to Geoff's funeral and it was as though Jayne was having a normal everyday conversation. He said that he had a difficult time with Geoff's passing because he had a tremendous amount of respect for Geoff and admired his genuine demeanor. He said he was more emotionally upset at the news of Geoff's death than Jayne did when she found him dead.

[REDACTED] was made aware of this transaction by [REDACTED]
[REDACTED]
[REDACTED] referred to the described
property [REDACTED], discreetly indicating Geoff and Jayne's residence of 373 Mizner Lake
Estates Drive in Boca Raton, Florida. One of the tangibles identified in this specific real estate
transaction was a rare 4.16 carat, GIA Fancy, intense blue-green, cushion-cut, diamond ring.

This diamond ring was provided to Jayne Hammond by the buyer, David Rosenberg. In addition to the diamond ring, Rosenberg received Geoff's 2008 black Ferrari in this transaction. [REDACTED] reported names and specific dollar amounts were omitted by CSI general counsel, Barry Weiss, [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED] I spoke to both of them by phone and they were very forthcoming about their friendship and thoughts of Geoff and Jayne.

Like all other witnesses that we spoke to who had some form of a relationship with Geoff and Jayne, they were consistent in their description of them both. Geoff was described as a stoic, respectable, man that had a strong presence about himself, and they used the word "presidential" to describe his overall presence and impression he left on people.

However, when describing Jayne, they said she could be nice at times, but nothing that left a lasting impression. Suzanne described Jayne as pompous and thought everyone else around her was of a lesser class.

Although Geoff and Jayne appeared to be wealthy and successful, Jayne clearly pointed out to others that she was more well off than those around her. [REDACTED] gave an example of Jayne's behavior, commenting once how much she would love to be able to afford a luxury Jaguar for her birthday. [REDACTED] said she did not expect her husband to buy her one, as it was not in their budget. [REDACTED] indicated that Jayne went out and bought the very Jaguar she desired, exactly the color [REDACTED] mentioned, and made a point to flaunt it in front of [REDACTED] on the day of her birthday. This was a classic case of "one-upmanship," a common characteristic of Jayne that [REDACTED] experienced.

Of importance was their description of when they first learned about Geoff's sudden death. Both stated that the news was so big they could recall exactly where they were and what they were doing at that time. According to [REDACTED] she came across Jayne's Facebook post stating, "Rest in peace, Geoff." [REDACTED] said she immediately shared this news [REDACTED] and reached out to Jayne. [REDACTED] said that she was surprised that it took about a week to hear back from Jayne but figured that she was going through a mourning period due to the loss of Geoff.

When Jayne finally called [REDACTED], she was told that Geoff suddenly died and was found outside. Jayne explained that Geoff went to do some work outside in the yard and after about 30 minutes had passed, she grew concerned and went out to look for him. She said Jayne reported this was when she found Geoff dead, lying down outside the house in the front yard of the property.

[REDACTED] was asked if she was certain that Jayne told her Geoff was found dead outside, and [REDACTED] adamantly said she was positive that was what she was told.

During the interview, questions about being mentioned in the 1999 alleged will of Geoff Hammond were addressed. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] had no additional information to provide; however, they specifically expressed being fearful if Jayne found out they said anything negative about her or were talking to an investigator. They said they felt that Jayne or a paid third party would harm or kill them.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

On Friday, July 10, 2020, I conducted a telephonic interview with [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED] she had a difficult time accepting he would no longer be around. She was surprised that [REDACTED] Jayne showed no emotion or sadness over the death of Geoff, [REDACTED] said Jayne explained her lack of emotion to her by telling her on multiple occasions to remain strong for her and that there was no reason to be sad because he was still with us in spirit. [REDACTED] reiterated that Jayne showed zero emotion or sadness, not even the slightest emotion, whenever Geoff or his life was ever brought up.

[REDACTED] also observed a drastic change in Jayne's health, physical appearance, and social activity. She described Jayne as having numerous medical or health issues throughout her life. Jayne appeared to walk with an uneven gait, and she was aware that Jayne had heart issues, which resulted in two bypass surgeries.

Jayne's medical restrictions appeared to prevent her from doing many physical activities and stopped her from attending some family gatherings. Jayne's bypass surgeries, the first one on February 14, 2017, and the second one around January of 2018 for complications, did not seem to stop Jayne from life after Geoff died. [REDACTED]

[REDACTED]

[REDACTED] said that after Geoff died, Jayne went through drastic physical and social changes, changes that appeared to take discipline and were not related to isolation, depression, or stress. She said Jayne's physical appearance was the most noticeable change. [REDACTED] stated Jayne lost 80 to 100 lbs., underwent cosmetic surgery, and had dental veneer procedures performed.

Jayne's social life also changed. [REDACTED] stated Jayne began to date through various dating sites, attended more social events, and took exotic trips and vacations, traveling by private yacht and commercial airlines. [REDACTED] said this was a surprise to her because Jayne always claimed she couldn't fly and would demand that Geoff drive her everywhere, including long distances or when traveling to other states.

Whenever attending family gatherings or visiting [REDACTED] never let [REDACTED] alone with anyone for longer than a few minutes, at least with adults. She said that the only time she seemed to leave Geoff alone was when he would play games [REDACTED].

[REDACTED]

██████████ was also aware of and witnessed Jayne criticize Geoff's biological daughter, Tara Helman. Jayne would often express ██████████, that she did not like Tara. David would also make comments about Tara saying that he and Jayne thought of her as "greedy or money hungry." ██████████ experienced no evidence of Tara being greedy and thought of her as always being nice and pleasant.

██████████ first became aware that Jayne was "online dating" in February or March of 2018, and it appeared she dated many different men, often at the same time. ██████████. She stated she would have thought that Jayne would have taken more time to spend with family.

██████████ recalled when she first heard that ██████████ died. ██████████
██████████
██████████ received a phone call ██████████ were aware of Geoff's death and were told that he had a brain aneurysm.

██████████
██████████
██████████
██████████
██████████

██████████ David had originally stated that Geoff died in his bedroom with blood coming from his nose and suffered a brain aneurysm. ██████████
██████████ received an update stating that Geoff died in his sleep. ██████████
██████████ it was later stated that Geoff was found dead on the floor in his office. ██████████
██████████

██████████ reiterated that Jayne did not show any signs of emotion or sadness, nor did she cry as the result of Geoff dying. She said that Jayne found it necessary to show ██████████ significant bruises, darkened around her wrists and forearms. ██████████ exclaimed that looking back at those times now, she felt frightened to think that maybe Jayne sustained serious bruises as a result of a physical altercation ██████████

██████████ She said Jayne showed no evidence of confusion or preoccupation that you would expect to see when someone suddenly experienced the death of a loved one, stating that she, in fact, was behaving very cavalier.

██████████
██████████
██████████
██████████
██████████

██████████
██████████

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

During the telephonic interview, [REDACTED] appeared to be honest and forthcoming when providing her statement and during the recall of the aforementioned events. [REDACTED] was able to provide many saved text messages that allowed for verification of specific dates and times, and statements made [REDACTED] [REDACTED] would make an excellent witness.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

[REDACTED]

On Sunday, July 19, 2020, I telephoned [REDACTED] expressed concern surrounding [REDACTED] death and could not accept his cause of death was due to a heart attack. She described Geoff as a strong, intelligent, and dedicated entrepreneur and businessman.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

_____ when they did socialize, Jayne always accompanied Geoff.

She described Jayne as evil and mean. [REDACTED]
Jayne would always talk over Geoff and would not leave him alone with anyone. If Geoff went to another room to visit with someone, Jayne would immediately call him back or go to where Geoff was.

██████████ said Jayne appeared to put restrictions on Geoff and demanded all his attention.

She said that Jayne always appeared to have health issues, ranging from back and knee problems, which caused her to walk with an uneven gait, to having issues with flying commercially. These issues caused Geoff to drive everywhere they traveled, including commuting back and forth from South Carolina to Florida for work and pleasure.

learned that Jayne wanted these payments to end and chose to stop sending financial support for [REDACTED]. Geoff found out what Jayne had done and became extremely upset with Jayne and continued the monthly checks until [REDACTED] death.

██████ recalled hearing of Geoff's death when David Hammond, Jayne's biological son, called her at 10:46 a.m., stating that Geoff had died of a heart attack and was found in his home office lying face down in his boxer shorts. ██████

After getting over the shock of Geoff dying, she later reflected on how he purportedly died and the way he was found. She said she found it unusual that Geoff was found in his boxers on a separate floor and room of the house. She explained that the time he allegedly suffered a heart attack was late in the morning and she said Geoff would have been fully dressed. She described Geoff as a consistent early riser at around 5:00 a.m. to 6:00 a.m. daily. She said he routinely got dressed immediately after rising in the morning, followed by drinking his morning coffee. The fact that he was found dead in only his sleep boxers was a surprise as he would normally be fully dressed.

██████████ about Geoff's death, how Geoff always appeared healthy, was strong, and that she could not believe he suffered a heart attack. ██████████ called him and stated Geoff was found in the bedroom, not the office. ██████████ said this discrepancy was perplexing to both of them and was something she still thought about to this day.

Geoff's sudden passing on Wednesday, June 14, 2017, was followed by his wake on Monday, June 19th, which was held at Menorah Gardens and Funeral Chapel in South West Ranches, Florida, near the border of the Florida Everglades. Geoff's funeral was on Tuesday, June 20, 2017, and his final resting place was at Star of David Memorial Gardens Cemetery and Funeral Chapel in North Lauderdale, Florida.

██████████ described the clothing that Geoff was buried in as faded and tattered, a wrinkly black shirt and black pants. ██████████, were taken aback by the way Geoff had been dressed because he had always been nicely dressed. She said Jayne dressed in dumpy black clothing that she often wore to many family gatherings. ██████████ mentioned that many of the people attending Geoff's funeral were surprised that Jayne was noticeably late and the last to arrive. She said Jayne showed no emotion and appeared to be "put out" in having to attend the funeral services.

██████████ said that Jayne's insolent behavior was definitely consistent throughout the 40 years that she had been married to Geoff. ██████████ said she had hoped and expected that during a time when most people were quiet, sorrowful, and often in disbelief that a loved one had suddenly passed, Jayne would have showed emotion and presented herself with respect equal to the occasion in the presence of guests attending the wake and funeral.

██████████ said that she and many others who attended both the wake and funeral talked amongst each other about Jayne's cavalier demeanor. ██████████ was particularly taken back when a small group of family members gathered in a circle holding hands in order to pray. Just as they started to pray, Jayne received a phone call on her cell phone. Jayne took the call, causing everyone to wait until she finished her phone call, which was at least a few minutes. When Jayne terminated her phone call, she casually apologized and said that she thought that it was Geoff. ██████████ recalled that the phone call Jayne received was from the movers coordinating her (Jayne's) move from her South Carolina residence to her other residence.

██████████ reiterated that Jayne's rude behavior was nothing unusual. Jayne would consistently talk unscrupulously about anyone when they were not around, particularly about her ██████████

█████ stated one of the most disturbing comments Jayne made was that she wished Geoff would let her son, David, run his company, CSI, and take it over. █████ remarked that in retrospect, it would not surprise her if Jayne had something to do with Geoff's death.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

█████ stated he respected Geoff for who he was and who he became and admired his █████ success in life and business. However, he stated Geoff's marriage to Jayne was something he could never understand. █████ said that part of what he respected about Geoff was his level of intelligence and ethics. His years of observing Jayne's controlling and manipulative behavior and disrespect towards Geoff and everyone else around her was incomprehensible. █████ stated his view was equally shared by █████ as well as Geoff's close friends.

█████ said he could tell that in the last few years of Geoff's life, he appeared to be growing less tolerable of Jayne's needy behavior and bitter or negative attitude. ██████
█████ Geoff started to resist Jayne and stand up to her negativity and rudeness, especially towards others.

█████ said that not long after Geoff had passed, he received a call or text from ██████████. ██████████ shared with ██████ that Jayne made an unsolicited statement, "Tara thinks I poisoned Geoff!" ██████ said that he and ██████████ were disturbed by Jayne's comment.

Although Jayne made this statement after [REDACTED] there was no mention or discussion about the specific cause of death for Geoff. [REDACTED] were suspicious about the cause of Geoff's death, and a lot of things did not make sense, but to specifically identify his death due to poison, which appeared to stem from [REDACTED], still troubled him today.

[REDACTED] explained two additional matters about the death of [REDACTED]. While he attended Geoff's wake, he was surprised at the choice of clothes Jayne had chosen for his [REDACTED] viewing and burial. He described Geoff as always being professionally dressed and even casual dress for Geoff was consistently business casual. However, Jayne had chosen for Geoff to be wearing old and severely worn clothing that was described as a disco outfit. He said he felt Jayne was purposely disrespecting Geoff and the sacred and sorrowful tradition of a viewing and burial.

Another disturbing comment overheard by [REDACTED] when Jayne was talking to a funeral attendee, [REDACTED], *"If that were true, I'd be in jail now!"* Although [REDACTED] said he did not hear the entire conversation between Jayne and [REDACTED], whether it was a response to a question or part of an unsolicited statement, his feeling of uncomfortableness was mounting with Jayne's voluntary and unsolicited statements, explanations, unusual actions, her overall demeanor, and lack of any emotion related to Geoff's death. He reiterated it was, "Bizarre, to say the least."

[REDACTED] said that Jayne's detail of events leading up to and post the death of Geoff did not appear to fall into any normal scope of someone who had just suffered the loss of a spouse, particularly a union of 42 years.

[REDACTED] indicated they later learned from others that Jayne described to various friends and family five different versions of where she found Geoff lying dead. When Jayne spontaneously commented [REDACTED], without specifics or details but somehow concluded that Tara believed her father was poisoned by Jayne, it has become [REDACTED] focus, and he stated he wants the truth told of Geoff's actual cause of death.

[REDACTED] Geoff was getting tougher with Jayne, becoming less tolerant of her negative attitude, rudeness, and overall control over him. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
2019 – 2020

I spoke with and interviewed witness [REDACTED] on several occasions, both on the phone and in person. The following is a summary of her statement.

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] stated when she heard the news of Geoff's death, it took her by surprise. She described Geoff as a successful entrepreneur and business leader. He was healthy and always carried himself as a confident professional with excellent leadership qualities, which seemed to be the consensus of all who met him or worked with him, whether briefly or long term.

[REDACTED] remarked that on the other side of the spectrum, Geoff was very private about his personal life and came across as a man that possessed a strong sense of pride, particularly when it involved his family. [REDACTED] explained that Geoff's wife, Jayne P. Hammond, was very controlling of him, and appeared to never want him to be alone with anyone, especially other women. [REDACTED] said that this was challenging for Geoff as that meant Jayne was with him often around business functions.

[REDACTED] described Jayne as mean-spirited, and a person who appeared to maliciously make everyone around her feel less significant and lower class. Jayne described herself as a self-proclaimed registered nurse, which was subsequently found to be false. Jayne had no medical training or education, though she adamantly stated she attended the University of California, Los Angeles (UCLA).

Below is a downloaded copy of Jayne's LinkedIn profile, which clearly demonstrates her embellished resume and education.



- Jayne Hammond

President of CSI Int'l. Inc

- Fort Lauderdale, Florida



CSI International, Inc.

Dates Employed: Nov 1988 – Present

Employment Duration: 31 yrs. 10 mos.

RN

Doctors Joe & John Clemente

Dates Employed: Apr 1987 – Oct 1988

Employment Duration: 1 yr. 7 mos.

Eatontown, NJ

Helped run the office and took care of patients as needed

Education

-



UCLA

Degree: BS

Field of: Nursing

Towards the last year and a half of Geoff's life, [REDACTED] observed Geoff's patience for Jayne diminish, as if he appeared to become less and less tolerable of Jayne's mean-spirited demeanor [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] explained one instance when she observed Geoff and Jayne attend a corporate event in late 2016. She said that where Geoff was always punctual, specifically related to business, she noticed that Geoff and Jayne were late in attending this particular event. She said Geoff appeared to be upset with Jayne, as she had been drinking and was noticeably intoxicated. [REDACTED] noticed that Geoff took a drink from Jayne and overheard him saying to her, "This is not lemonade!"

[REDACTED] stated Geoff had been struggling with Jayne's abuse of prescription medication, particularly opiates, and may have been the reason they had been seen frequently arguing at the office, business events, and at social events. She said Jayne was very possessive of Geoff and Jayne did not like him being away from her. Jayne always seemed to be demanding of Geoff's time.

[REDACTED]

[REDACTED] provided details of when she learned the day Geoff had died. [REDACTED]

[REDACTED] received a phone call shortly after 11:00 a.m.
[REDACTED]
[REDACTED]

[REDACTED] described Dan Brooke as a main principal in CSI whom Geoff appointed to "babysit" David, because Geoff had no confidence that his adopted son, David, was capable of doing anything in business. It was known that Geoff hired David at the pleading of Jayne. [REDACTED] said Geoff was frustrated with David and his irresponsibility and unprofessionalism, knowing that David had numerous complaints against him for sexual harassment. Against Geoff's desire to terminate David, he kept him employed after his June 2015 sexual harassment claim that cost CSI in settlement claims.

[REDACTED]
[REDACTED]
[REDACTED]

██████████ The consensus was disbelief that a family member, let alone a close family friend, was not asked to help with Geoff's funeral arrangements, particularly since Geoff was baptized Catholic and Rosenberg was Jewish. Thus, Rosenberg arranged funeral arrangements at a Jewish cemetery near the Florida Everglades.

██████████ David told ██████████ that Geoff was found dead in the master bedroom, lying next to an empty bottle of Tums and a blood pressure cuff. He also explained to her that Geoff's cause of death was due to having a "Widow Maker Heart Attack." ██████████ immediately questioned David as to how he would know that a day or two after he died until a medical report or coroner determined the cause of death. David replied, "Because I found a bottle of Tums in my dad's nightstand and on top of the nightstand was a blood pressure cuff with a notably high reading on the display."

Even more concerning to ██████████ was that Rosenberg was a diamond broker who advertised in CSI's *Opulence International Magazine*. She reported Geoff did not care for Rosenberg and described him as a "car salesman." ██████████ went on to explain that because Jayne used Rosenberg as her personal jeweler, Jayne convinced Geoff to allow Rosenberg free advertisement space in *Opulence International Magazine* for three years.

██████████ Rosenberg expressed to Geoff that he had no desire to pay for ad space and instead continued to offer free jewelry to Jayne. ██████████

██████████ Barry Weiss made it well known to everyone who would listen that he was the first one Jayne called to notify of Geoff's death; again, not a family member, her son David, or any of Geoff's siblings. ██████████ thought it odd to notify CSI general counsel Weiss, who also stated he was unaware if Geoff had a will because he did not think Geoff was expecting to die. Weiss also made another disturbing comment when he said, "Jayne called me first because the Boca property had to close on Friday, June 16th." ██████████ knew that the Boca property that Weiss was referring to was Geoff's property at 373 Mizner Lake Estates Drive, Boca Raton, Florida, 33432, which Geoff truly had no desire to sell.

██████████ the Mizner Lake Estates property was first purchased by Geoff and Jayne in February 2004. Geoff often expressed that he had longed to purchase such a home and worked hard to build his company so that he could afford to buy a property with a view of the water and golf course. Because his property was situated in a prestigious and luxurious private community, Geoff would occasionally put the property on the market. ██████████ said Geoff primarily put it on the market to appease Jayne, which was evident when it did not sell, and Geoff was elated. She said it was like Geoff had no desire to sell this house and he knew it was not going to sell.

In October 2016, the Boca property was listed on the MLS once again. Geoff and Jayne utilized the same realtor that sold them the [REDACTED]. They had a six-month contract with [REDACTED] that expired on April 30, 2017. It was at that time that David Hammond advised [REDACTED] that Geoff and Jayne were not going to renew the sale agreement and decided to take the property off the market.

After the house was taken off the market, [REDACTED] flummoxed that David Hammond, [REDACTED], put a private listing of the Mizner Lakes Estates Drive property, with David as the listing agent, in the spring issue of *Opulence International Magazine*. She reported the listing was strategically placed and buried among other and much larger photo listings.

[REDACTED] stated she believed Geoff was completely unaware that his property was once again listed, albeit privately, in his own magazine. She said Geoff was relieved when it was taken off the MLS report during [REDACTED] contractual agreement.

[REDACTED] noted it appeared she was not the only one who found all of this suspicious. After the Boca property was sold to David Rosenberg, [REDACTED] [REDACTED] [REDACTED]

[REDACTED] admitted to feeling uncomfortable with becoming aware that a rare, high-priced, colored diamond and Geoff Hammond's 2008 black Ferrari were secretly exchanged as part of the sale of the Boca property. Both tangible items were not listed on the closing documents [REDACTED]

[REDACTED] also stated that David Hammond was in the process of selling CSI's real estate company, Opulence International Realty. [REDACTED] Opulence International Realty sold its assets and released their employees to Brown Harris Stevens in October 2017.

[REDACTED] attended Geoff's viewing and funeral. The wake was conducted on Monday, June 19, 2017, and the funeral was scheduled on Tuesday, June 20, 2017. A reception followed in a small room of the funeral home building. Two wake/viewings were scheduled the same day. During the wake, [REDACTED] Jayne affirmed that Geoff had died and was found on the floor of the master bedroom and bathroom area. Jayne then proceeded to show both of her wrists [REDACTED], which showed distinct bruising, claiming they were sustained when she attempted to roll Geoff over onto his back to administer CPR.

At this point in time, five days had elapsed since Geoff's passing, [REDACTED] described the bruises she observed on Jayne's wrists as "perfectly outlined finger marks," as if someone had aggressively grabbed her wrists. Jayne also volunteered that she had to tell the police that if they

found footprints on Geoff's back, it was because she was jumping on his back in an attempt to revive him.

Note: This information contrasted with what was obtained from the 911 call to the police. There was also no mention on any first responder reports that footprints were noticed on Geoff's back at or post time of death, nor was a statement offered by Jayne explaining any rendering of lifesaving measures.

██████████ viewed Geoff in the coffin, she was sickened to her stomach as she observed a gash indentation at the hairline center right side of Geoff's head. She described the gash was approximately two to three inches in length and slightly at an angle. She also described the gash as swollen and raised. ██████████ said it looked as if Geoff was struck in the head with a golf club.

██████████ described a separate incident at Geoff's funeral reception when she heard a disturbing conversation. ██████████ David Rosenberg and Barry Weiss, who were discussing the Boca property and sale transaction, Rosenberg told Weiss, "If the house doesn't close by the end of the month, the deal is off." Weiss replied nervously that he was trying to obtain a copy of Geoff's "death certificate" so they can complete the Boca property transaction.

██████████ was perplexed by the comment made by Rosenberg of, ***"The house better close or the deal is off."***

██████████ was surprised that Jayne showed no emotion or expressed any empathy to friends and family regarding Geoff's death. She said she was also surprised when David Hammond moved into Geoff's office within a couple of weeks of his death.

It appeared ██████████ that Jayne felt no remorse over Geoff's passing. ██████████ said she found it disturbing that Jayne made immediate and drastic changes to her appearance. She said Jayne had lost over 100 lbs., received cosmetic surgery, obtained veneer dental work, and changed her overall hairstyle and wardrobe. For everything that Jayne was known for regarding not wanting to fly for travel, complain of various illnesses and physical restrictions changed within three months of Geoff's death.

██████████ Jayne would say she lost the love of her life, but Jayne was seen on dating apps within that same aforementioned three-month period. ██████████ reiterated she had suspicions surrounding Geoff's death.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] stated she later learned she possessed crucial and specific information confirming David's and Jayne's involvement of criminally committing theft, fraud, and tax evasion related to Geoff Hammond's will and trust and the sale of his Boca property.

[REDACTED] specifically recalled a conversation she had with David after the death of Geoff. She said she and David were [REDACTED] when he casually mentioned to her that he had to make changes to his dad's will. She said this struck her as odd but did not question him or ask for further details.

[REDACTED] she knew the Boca property was on the market for several months with the listing agent [REDACTED] and David Hammond. David later told [REDACTED] that his parents were not going to renew [REDACTED] contract and decided to take the property off the market; however, David confidentially told [REDACTED] he already had a buyer.

[REDACTED] was aware that the Boca property involved a transaction that included exchange of a diamond. She understood that the property was sold well below market value because of the exchange for the diamond that was provided to David's mother, Jayne.

[REDACTED] appeared to be honest and sincere in her statement and would make a good witness.

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

I telephoned [REDACTED] on several occasions during 2019, and as recently as August 30, 2020. I spoke to him for several minutes in 2019, inquiring about specific information related to possible criminal activity on the part of David B. Hammond, Jayne P. Hammond, and Barry Weiss [REDACTED]
[REDACTED]

[REDACTED] had a wealth of information that could implicate the aforementioned individuals stating, "Would get them in serious trouble." However, as much as he expressed that he would love to share this information, at the same time said he had concerns about serious repercussions. He also wanted to make sure I was not hired by David or Jayne Hammond. I assured him I was not hired by either of them and informed him of the identity of my client.

[REDACTED] was very friendly and sounded to be sincere in his statements. However, he requested time to let him think about submitting a statement and requested I call him the following day. I respectfully agreed and terminated the phone call.

I attempted to reconnect with [REDACTED] but have had negative results. I have left messages and sent an email requesting that he let me know his intentions, but to no avail.

I believe that [REDACTED] can provide information on [REDACTED] and may have knowledge of unethical or criminal behavior, particularly on the part of David Hammond and Barry Weiss.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

It was learned that [REDACTED] He was well recognized in the [REDACTED] and was acquainted with both Geoff and Jayne Hammond. [REDACTED] said that he became familiar with the Hammonds because they belonged to [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] did not have much to say about their casual and friendly relationship [REDACTED]
[REDACTED] When he became aware of the sudden death of Geoff, he was saddened. He recalled being told by Jayne's boat captain that Jayne found

Hammond Death Investigation

him dead in a peaceful position on his back, with his arms folded across his chest, bearing a slight content smile. He recalled feeling happy that Geoff appeared to die peacefully.

██████ had no further information to provide but advised me to talk to Jayne's boat captain for more information. ██████ could not recall the boat captain's name or how he could be contacted.

ADDITIONAL WITNESSES

The following list of witnesses are suspected of having information that could be helpful in the investigation; however, we elected not to contact the following witnesses due to a possible close and current relationship with Jayne P. Hammond.

████████████████████
████████████████
██████████████████
██ ██████████
████████████████
████████████████
██ ██████████
██ ██████████
████████████████

██
██
██
██
██

████████████████
████████████████
████████████████
██ ██████████
██ ██████████
██ ██████████
████████████████

██
██
██

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

PERSONS OF INTEREST

The provided list of names is persons who may have knowledge or be directly or indirectly involved in criminal violations of theft, fraud, forgery, providing false information or altering legal documents, and tax evasion related to the estate of Paul Geoffrey Hammond or his death by the hands of another.

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Based on our investigation, evidence stated that [REDACTED] either falsified documents or at the very least provided false documents and signatures [REDACTED]. Further investigation should be conducted to compare documents submitted as evidence [REDACTED] [REDACTED] in comparison to related documents allegedly secured in the law office [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] was the law firm on file that created a will and trust for Paul Geoffrey Hammond. It appeared they created a 1995 and a 1998 will. It has been alleged that two additional wills were created in 1999 and 2005, including an alleged trust in 2005. Based on our investigation, the 1999 and 2005 wills and trust were altered and forged. We do not believe that [REDACTED] did anything nefarious to the latter wills and trusts but may have a much different version of them if they had them at all.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] was the attorney of record for creating and executing the 1995 and 1998 wills for Paul Geoffrey Hammond and allegedly had the original locked in a vault at [REDACTED]. We believe he will be able to confirm if the content in all wills was accurate. Moreover, he will be able to verify if the 1999 and 2005 will and trust were valid and/or inaccurate in any manner.

[REDACTED]
[REDACTED]

[REDACTED] initially stated he would cooperate with our investigation [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] was given Geoff Hammond's prize 2006 burgundy Maserati by Jayne for unknown reasons. It may be speculated that the gift of Geoff's Maserati to [REDACTED] could be for his confidentiality and loyalty and to Jayne P. Hammond, and or her son, David B. Hammond.

It is presumed that [REDACTED] may have incriminating information on Jayne, David, and general counsel, Barry Weiss, that could implicate them in misappropriation of CSI funds, illegal or forged documents, fraudulent real estate transaction of the 373 Mizner Lake Estates property, corporate and personal tax evasion and fraud, and filing false or altered legal documents.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

We contacted [REDACTED] by phone on a couple of occasions in 2019. We advised her of our investigations and asked if she would be willing to talk about her involvement in the sale transaction of Geoff and Jayne Hammond's Boca property. [REDACTED] immediately changed her friendly demeanor and grew awkwardly quiet.

[REDACTED]

[REDACTED]

[REDACTED]

Todd Patterson is the biological son of Donald A. Patterson and Jayne P. Hammond, and half-brother to David B. Hammond. He was not well liked by many, including David, and most particularly not liked by Geoff Hammond. It was learned and well known by many that Patterson embezzled hundreds of thousands of dollars during his employment at CSI.

It was reported that Geoff and Patterson were confrontational with one another and never seemed to get along very well with each other. Four years after Geoff and Jayne purchased their home at 12 Hanover Way, Bluffton, South Carolina, Patterson moved from Florida to Bluffton six months prior to Geoff's death. Patterson lived approximately 15 minutes from Geoff and Jayne, and it appeared that Geoff was unaware that Todd moved to Bluffton, South Carolina, let alone a few short miles away.

Information was further developed that Patterson moved to Bluffton at the request of Jayne on or around November of 2016 so he could be close to her. Jayne was paying Patterson's lease payments.

Patterson should be investigated as a possible co-conspirator in the death of Geoff. Patterson may have been directly or indirectly involved in the planning and/or execution of Geoff's death, as it appeared that another man's voice could be heard in the background of the 911 call, which was followed by Jayne whispering, **"Don't!"**

Based on our investigation and witness statements, emergency personnel were not on scene at this time, and Colleton River security attested that the male voice that was heard was not their personnel.

Of note, it was not long after Geoff died that Patterson moved from Bluffton and returned to Florida around September 2017.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

Several attempts were made to speak with [REDACTED] to discuss her professional relationship with Geoff and Jayne Hammond. When I called her, she immediately asked why I contacted her, and I advised her that I was investigating David Hammond and his subsequent real estate transaction regarding the listing of Geoff and Jayne Hammond's Boca property.

On the two separate occasions I was able to connect with her on the phone, she agreed to answer any questions but claimed to be currently busy at the moment. On both occasions, [REDACTED] agreed to call me back but has failed to do so, even after subsequent phone calls to her to follow up on our previous inquiries.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

POSSIBLE SUSPECTS/CO-CONSPIRITORS

Jayne P. Hammond – decedent's widow

[REDACTED]

[REDACTED]

David Brett Hammond

[REDACTED]

*****Oldest son of Jayne P. Hammond*****

[REDACTED]

****Note: David Hammond, born David H. Mandel on 05/30/1963. Birth father was identified as [REDACTED] Later adopted by Geoff Hammond after being told by Jayne that David's biological father was deceased. David was adopted in approximately 1980 or 1981 out of Monmouth County, New Jersey. [REDACTED]***

[REDACTED] We spoke with him by phone and he stated he was unaware that his son David had been adopted and did not give Geoff permission to adopt him.

David M. Rosenberg – [REDACTED]

Diamond Dealer – Purchased Geoff's Boca estate on June 23, 2017. He was also given Geoff's Ferrari by Jayne in exchange for a 3-4-million-dollar diamond in a surreptitious deal between Jayne Hammond and Rosenberg.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Barry Alan Weiss – [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

General counsel for CSI International – Florida Bar License: 515078

Weiss appears to have his hand in several questionable transactions, from filing legal documents. He is suspected of creating, falsifying, manipulating, or altering various real estate documents, Geoff's will and trust, and other miscellaneous legal documents.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

WILL & TRUST INVESTIGATION

As a result of our previous investigation, there appeared to be both physical and circumstantial evidence that Paul Geoffrey Hammond's final will and testament, coupled with the trust provided to Helman by CSI general counsel, Weiss, was fictitious and was specifically orchestrated and constructed by Jayne P. Hammond, David Hammond, Barry Weiss, and [REDACTED].

We found discrepancies in both will and trust documents, which contained what we have investigated and believed to be transferred signatures of decedent, Paul Geoffrey Hammond.

[REDACTED]
[REDACTED]

Our investigation also confirmed that at least one of three witnesses, [REDACTED] who adamantly stated she was not present on February 24, 2005, to witness the indicated

documents because she terminated her employment 18 months prior, after giving birth to her child. [REDACTED] stated she never returned to that same employer.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

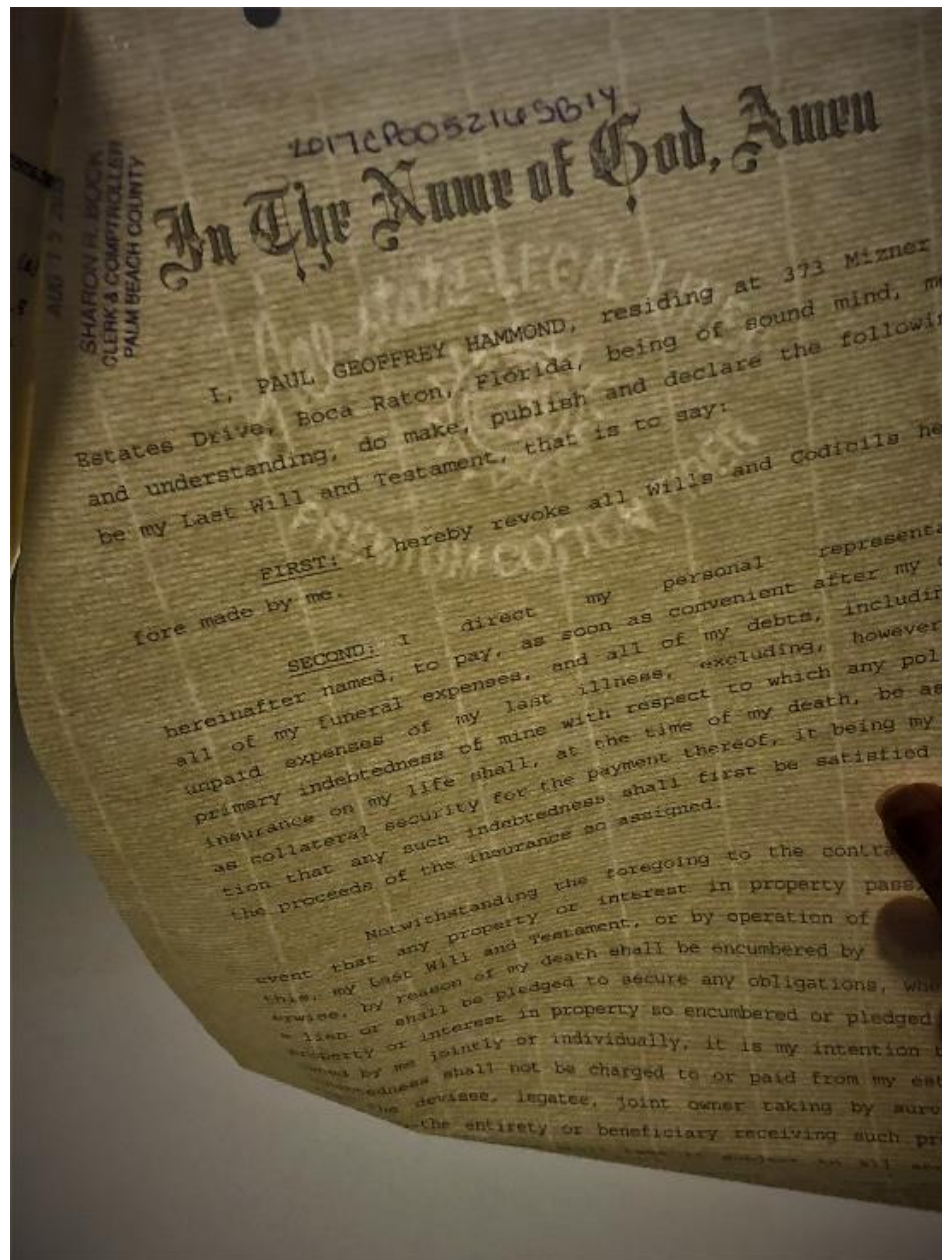
[REDACTED], we believe additional findings supported the claim that the submitted will had been altered and was either not the original and/or it was a will that was fraudulently created with the intent to permanently deprive assets from prospected recipients and avoid probate.

The objective evidence that was found in the 2005 will was determined after examination by a professor and board-certified forensic handwriting expert, Dr. Roy Fenoff. His reports are attached for your review and marked as: **(Exhibit C)**

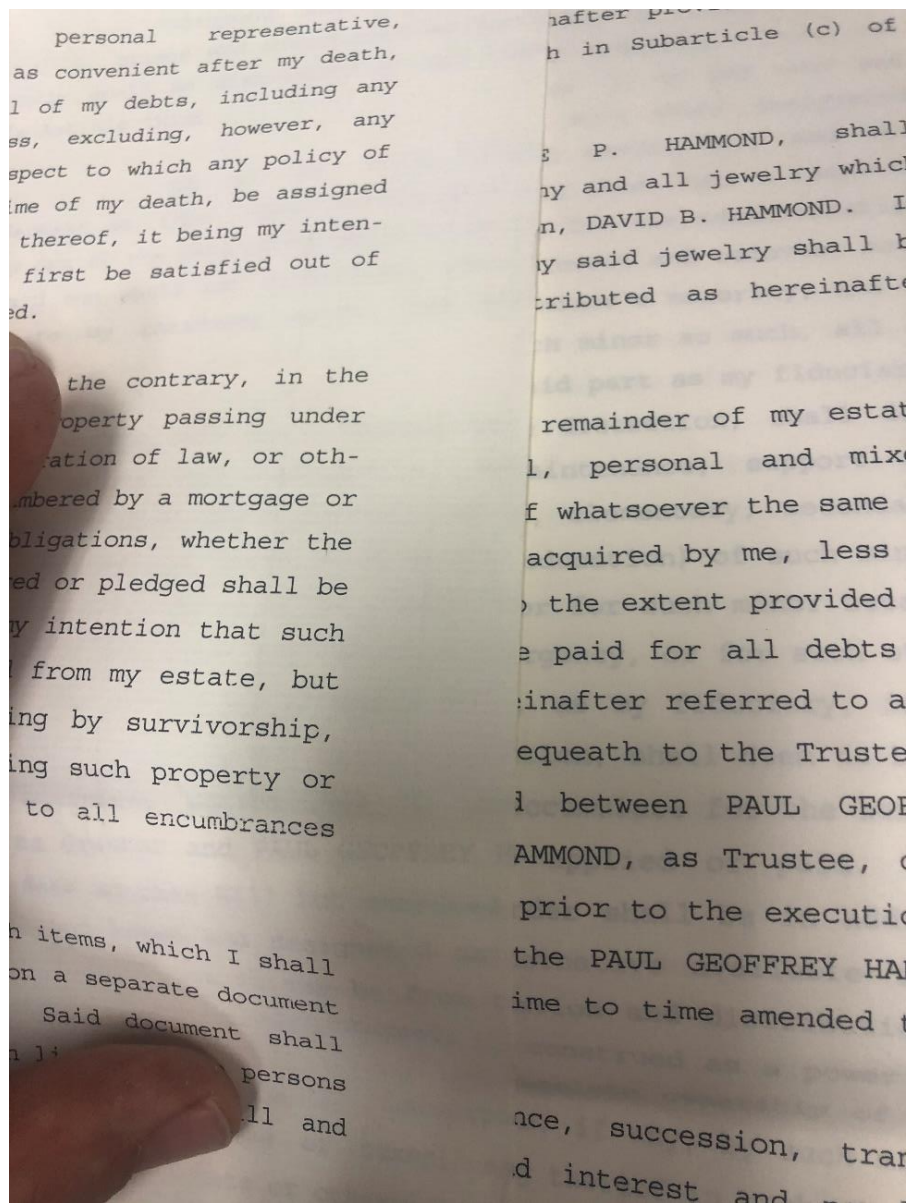
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]:

- A nine-page document printed on legal-sized paper, using two different types of paper stock.
- Page 1 of the will was generated on and identified as coming from All-State Legal paper company in New Jersey.
- Pages 2 through 9 were generated on a completely different type of paper stock, noticed in both fiber and design.
- Page 1, printed on the All-State Legal paper, had a distinguishable and unique watermark on the back, used for security and identification purposes on all legal-sized paper they manufactured (see photo below).



- The watermark on the All-State Legal paper was coded with a manufacturing date, which showed it was last produced prior to 2002.
- Page 1 showed to have been printed with a distinctly lighter ink.
- The font showed a difference of regular vs. bolded text.
- By doing a side-by-side comparison of the two pages, the color contrast from Page 1 to the subsequent pages of the document can be seen (see photo below).



- [REDACTED]
- [REDACTED]
- Handwritten signatures and letters allegedly produced on the will at the time it was created were found to be live ink. However, this raised the question if the page was inserted from a different document. According to Dr. Roy Fenoff, he noted that the numerous pages of this document were formatted inconsistently, and more likely from different and/or newly created documents.



- Lastly, one of the three alleged witnesses in the 2005 will, [REDACTED] provided a statement to investigators [REDACTED]
- [REDACTED]

[REDACTED], defendants Jayne P. Hammond and her son, David B. Hammond, were prompted to produce copies of three additional wills, allegedly created and executed in 1995, 1998, and 1999.

Review of the three alleged previous wills produced robust and detailed content, consisting of 37 pages in the 1995 will; 41 pages in the 1998 will; and 41 pages in the 1999 will. The large discrepancy between number of pages and content should be noted when comparing these three will to the nine-page 2005 will. The content of those wills revealed an extreme contrast of decedent's lifestyle, family dynamic, and the 2005 will expressly excluded specific members and relatives known to be loved and cared for by decedent.

Copies of the three previous wills were examined for content and consistency. From that examination, the differences between all the wills exceeded 20 unusual provisions and divisions

Hammond Death Investigation

of the decedent's estate. Most importantly, there were two specific phrases indicated in all three wills that raised compelling questions for concern.

[REDACTED]

If at any time my wife, **JAYNE P. HAMMOND**, is serving as sole trustee of the **PAUL GEOFFREY HAMMOND GENERATION SKIPPING TRUST**, the **JAYNE P. HAMMOND TRUST** and/or the **RESIDUARY TRUST**, irrespective of the cause thereof, she shall designate one or more individuals and/or a corporate banking institution to serve as co-trustee with her, it being my intention that my said wife shall **never** act as sole trustee.

The above stipulation, particularly focusing on the word, "**never**," could be perceived and argued that the decedent did not want and/or trust his wife, Jayne Hammond, to solely manage or control his trusts and/or assets.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Information was also discovered during the investigation that two of Paul Geoff Hammond's vehicles were either sold, gifted, exchanged for, and/or fraudulently transferred with title, without apparent knowledge by Geoff Hammond. The transfer of both vehicles was executed on June 10, 2017, four days prior to Geoff's unexpected death; however, both vehicles were not delivered to the new owners until after the death of Geoff Hammond.

Once this information was uncovered, we identified both vehicles. We requested a certified copy of the title transfer of the following vehicle by Florida Department of Motor Vehicles:

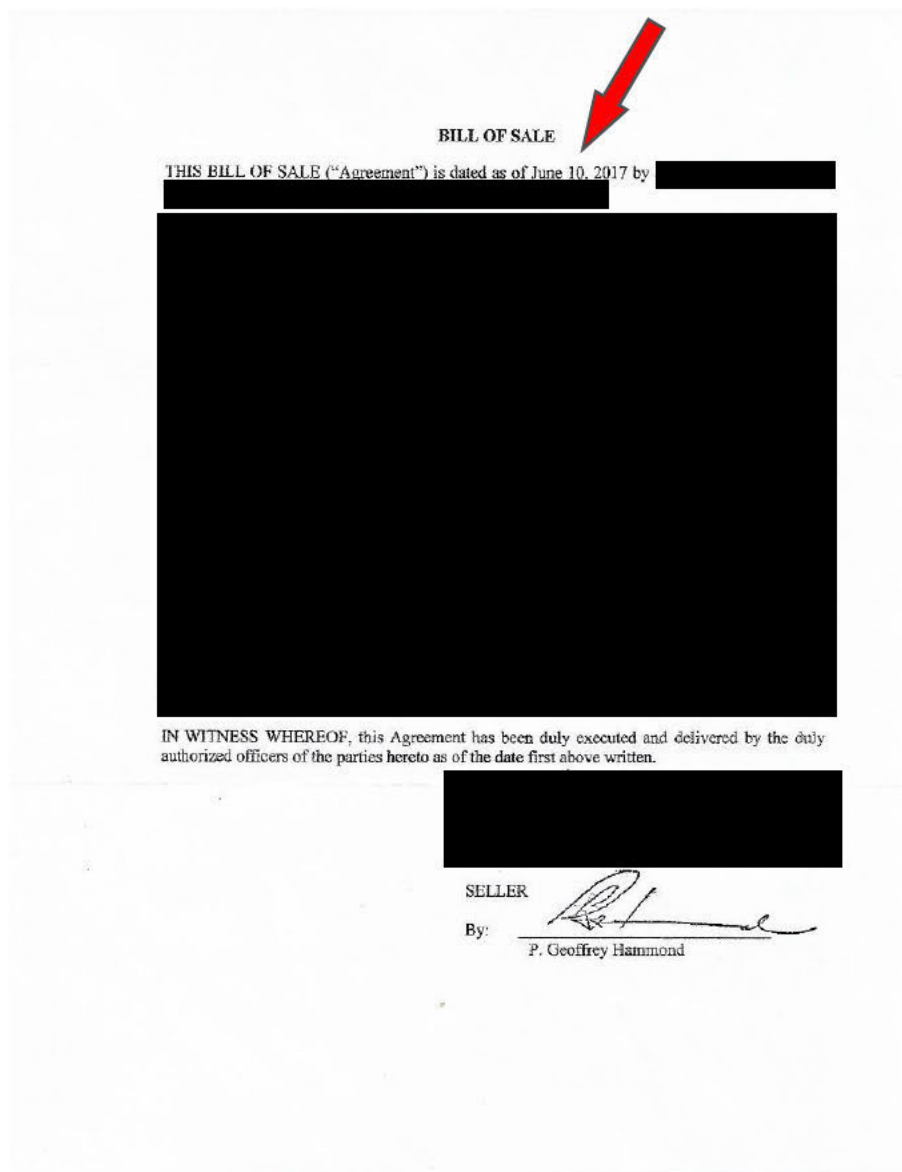
Make: Harley Davidson Motorcycle
Year: 2005
Model: Screaming Eagle FLHTCSE2

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

Transfer of this motorcycle title was provided to [REDACTED]

[REDACTED] said he was taken by complete surprise, particularly when he received the title and bill of sale, which had been executed and backdated to June 10, 2017, four days prior to Geoff's death.

[REDACTED] became increasingly suspicious and upset once he realized both documents were backdated, and because Geoff had never mentioned anything about giving him the motorcycle. [REDACTED] said he felt Jayne or her son, David, were responsible for this activity, indicating he could not understand why they would forge his brother's signature and for what reasons (see Bill of Sale and Certificate of Title below).



CERTIFICATE OF TITLE

SATISFACTORY PROOF OF OWNERSHIP HAVING BEEN SUBMITTED UNDER SECTION 319.23/328.03, FLORIDA STATUTES, TITLE TO THE MOTOR VEHICLE OR VESSEL DESCRIBED BELOW IS VESTED IN THE OWNER(S) NAMED HEREIN. THIS OFFICIAL CERTIFICATE OF TITLE IS ISSUED FOR SAID MOTOR VEHICLE OR VESSEL.

VESSEL REGIS NO: [REDACTED] PREV ISSUE DATE: [REDACTED]

LIEN RELEASE
INTEREST IN THE ABOVE DESCRIBED VEHICLE IS HEREBY RELEASED BY [REDACTED]

TITLE: [REDACTED] DATE: [REDACTED]

1ST LIENHOLDER: NONE

DIVISION OF MOTOR VEHICLES TALLAHASSEE FLORIDA

Control Number: 69349460

DEPARTMENT OF HIGHWAY SAFETY AND MOTOR VEHICLES

Signature of Carl A. Ford, Director

Signature of Fred O. Dickason, III, Executive Director

ODOMETER CERTIFICATION - Federal and state law require that you state the mileage in connection with the transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

This title is warranted and certified to be free from any liens except as noted on the face of this certificate and the motor vehicle or vessel described is hereby transferred to Purchaser.

I/We state that this ☐ 5 or ☐ 6 digit odometer now reads ☐ 7 ☐ 8 ☐ 9 ☐ 0 (in tenths) miles, date read [REDACTED] and to the best of my knowledge that it reflects the actual mileage of the vehicle described herein, unless noted the odometer statement blocks is checked.

CAUTION DO NOT CHECK BOX IF ACTUAL MILEAGE

1. I hereby certify that to the best of my knowledge the odometer reading reflects the amount of mileage in excess of its mechanical limits.

2. I hereby certify that the odometer reading is not the actual miles.

WARNING - ODOMETER DISCREPANCY

UNDER PENALTY OF PERJURY, I HEREBY READ THE FOREGOING

Signature of Purchaser: [REDACTED]

Signature of Co-Purchaser: [REDACTED]

Signature of Seller: [REDACTED]

Signature of Co-Seller: [REDACTED]

Selling Dealer's License Number: [REDACTED] Tax No. [REDACTED] Tax Collected \$ [REDACTED]

Auction Name: [REDACTED] License Number: [REDACTED]

STATE OF FLORIDA

According to Dr. Roy Fenoff's forensic report, it was determined that the above Harley Davidson title was backdated, and Paul Hammond's signature was forged by Jayne P. Hammond. His report also indicates that the above "Bill of Sale" for the same motorcycle is a "copy and paste" forgery. We suspect that Jayne is also responsible for the Bill of Sale forgery.

Hammond Death Investigation

The second vehicle registered to Paul Geoffrey Hammond was identified as follows:

Make: Ferrari
 Year: 2008
 Model: 2-Door

Color: Black

During the investigation it was discovered that the Ferrari became a negotiable asset as part of an undisclosed transaction in the sale of the Hammond's Boca property between David Rosenberg and Jayne Hammond. Apparently, Rosenberg was given the Ferrari in exchange for a 4.16-carat diamond ring; GIA Fancy, intense blue-green, and cushion-cut. The ring was given to Jayne Hammond. It is our contention that these assets were intentionally excluded from the closing documents in order to avoid paying taxes, doc stamps, conceal assets, and circumvent probate.

CERTIFICATE OF TITLE

1st Lienholder
 NONE

Address: 232 S. W. 1st Ave. Boca Raton
 Seller's Date: 6-10-2017
 6/27/17 I hereby certify that to the best of my knowledge the above is the actual vehicle.

UNDER PENALTY OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DOCUMENT AND THAT THE FACTS STATED IN IT ARE TRUE.

SELLER Name: Paul Geoffrey Hammond
 Sign Here: [Signature]
 Print Name: Paul Geoffrey Hammond
 Selling Dealer's License Number: _____
 Assistant Name: _____
 License Number: _____

CO-SELLER Name: _____
 Sign Here: _____

Tax Collected: _____

STATE OF FLORIDA

Hammond Death Investigation

The above document was also examined by other witnesses, [REDACTED]

[REDACTED] Based on their examination, they stated they believed David signed and printed on the indicated Certificate of Title.

Helman, and witnesses close to Geoff, indicated they felt strongly confident that Geoff would not have considered and/or offered his 2008 Ferrari as part of the Boca property real estate transaction. There was no information found or statements made that indicated Geoff had or was considering selling this vehicle to a third-party.

Both documents were also examined by the forensic handwriting expert, Dr. Fenoff. With his examination of the Harley Davidson DMV Title, coupled with copies of original signatures by Jayne P. Hammond, he concluded that Jayne Hammond was the author of the Paul Geoffrey Hammond signature on this document title.

After Dr. Fenoff's examination of the 2008 Ferrari DMV Title, he opined the signature of Paul Geoffrey Hammond was inconsistent with known signatures that were examined for comparison. Dr. Fenoff concluded that Paul Geoffrey Hammond did not sign this document title that indicated Geoff sold his Ferrari to David Rosenberg.

INVOLVED PARTIES AND ENTITIES**Property**

373 Mizner Lake Estates Dr.

Boca Raton, Florida 33432

First Purchased by P. Geoffrey and Jayne P. Hammond on 02/25/2004

Square Footage: 7,387 sq. ft.

Property Owners

P. Geoffrey Hammond and Jayne P. Hammond

Warranty Deed – Unnotarized

No trust Indicated by Hammond or in public records search

Realtor to P. Geoffrey Hammond and Jayne P. Hammond

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Sale Price – 02/25/2004

\$4,050,000

[REDACTED]
[REDACTED]

Hammond Death Investigation

[REDACTED]
[REDACTED]

Property Listing History During Hammond Ownership – Pre-2016

On Market: April 24, 2010 Price \$5,295,000
Off Market: September 27, 2010
On Market: December 3, 2010 Price \$4,800,000
Off Market: October 21, 2011

Market Listing by P. Geoffrey Hammond & Jayne P. Hammond

On Market: November 2, 2016 – By Lang Realty Price Listing \$4,950,000
Price Drop: March 1, 2017 New Price: \$4,599,900

Lang Realty Contract Expired

Expiration Date: April 30, 2017

****Note: According to David Hammond, both Geoff and Jayne Hammond decided to take the property off the market. This also was noticed as an expired listing on the MLS report.***

Listing Removed: May 1, 2017

Boca Property Relisted – Private – Not MLS Listing

Listed Exclusively Under: Opulence International Realty
Date Relisted: May 1, 2017
Realtor: David Hammond
Broker: [REDACTED]

Boca Property Sold

Escrow Closed: June 23, 2017
Escrow Company: Peninsula Title
New Owner: Trust
Trust Name: 73 Degrees Revocable Trust
Date Trust Created: June 9, 2017
Recording Date: June 27, 2017

Trustees

David Rosenberg
[REDACTED]

Boca Property Sale Amount to Rosenberg

Final Sale Amount: \$2,700,000
Prior Listing Amount: \$4,950,000 back in April 2017
Loan Amount: \$2,025,000

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

Two Separate and Similar 2017 Property Listings within the Boca Raton Resort – Comps

Hammond Death Investigation

307 SE Mizner Lake Estates Drive
Boca Raton, FL 33432

Closing Price: \$4,750,000
Closing Date: May 17, 2017
Square Footage: 7,253 sq. ft.

385 SE Mizner Lake Estates Drive
Boca Raton, FL 33432

Closing Price: \$3,740,000
Closing Date: June 19, 2017
Square Footage: 7,150 sq. ft.

**** (See Exhibit E)**

Rosenberg's Previous Residence Prior to the Purchase of Boca Property

Current Ownership: David [REDACTED] Rosenberg
Purchased Date: March 19, 2003
Purchased Amount: \$325,000

****Note: David [REDACTED] Rosenberg currently own their previous residence. According to our investigation, it appeared the Rosenberg's had to apply for a jumbo loan. Although plausible, it is unlikely they were able to apply for a jumbo loan and be approved from May 1, 2017, to June 23, 2017, using a down payment of \$675,000.***

TIMELINE

The below created timeline centers around the sale of the Boca property and death of Paul Geoffrey Hammond. We believe this timeline is correct, supported by exhibits and evidence, specific criminal violations regarding tax evasion, fraud, and evidence of forgery and possible homicide. The attached exhibits will support both criminal and civil filings.

November 2, 2016 – Property at 373 Mizner Lake Estates Drive was listed for sale [REDACTED]

November 2016 – Jayne Hammond's second son, Todd Lawrence Patterson, moved from Florida to [REDACTED] Bluffton, SC 29910, at the request of Jayne in order to have Patterson close to her. Allegedly, this information was unknown and kept from Geoff because Geoff and Patterson had a strong animosity towards each other. Jayne was also paying Patterson's monthly lease.

February 14, 2017 – Jayne Hammond underwent open-heart, triple-bypass surgery at Hilton Head Regional Hospital in South Carolina.

February 21, 2017 – Jayne was discharged from the hospital and returned home to South Carolina in order to further recover. Geoff sought help from a personal nurse, but Jayne insisted she was to be cared for by Geoff.

April 19, 2017 – CSI held a customary board meeting that Geoff Hammond attended and lead. During that meeting, Geoff firmly stated [REDACTED] that David Rosenberg was no longer eligible to receive free ads and/or publication for advertising his jewelry business, Rosenberg Diamonds & Company LLC, and Rosenberg Diamonds & Company, Inc. Rosenberg was granted courtesy advertisement in *Opulence International Magazine* in exchange for selected jewelry, as requested by Geoff's wife, Jayne P. Hammond, for a three-year period. Per Geoff's request, the instruction to stop the free ads became effective with the magazine's summer edition, June 2017.

April 27, 2017 – David Rosenberg purchased AMGAD Inc., remaining shares of a 4.16-carat, GIA Fancy, intense blue-green, cushion-cut, diamond ring.

Note: this identified ring is currently listed for sale in the amount of \$3.75 million.

April 30, 2017 – Contract and listing [REDACTED] expires. Realtor [REDACTED] was advised by David Hammond that his mother and father, Jayne and Geoff Hammond, were going to take the property off the market, and informed her there was no reason to continue to list the property and/or extend the contract [REDACTED]. However, David immediately became the sole listing agent for the Boca property, leaving it listed only through Opulence International Realty. The property was not relisted on the MLS, indicating this was a private sale that could have already been considered and/or a planned listing by David and Jayne. **(See Exhibit F)**

May 1, 2017 – David B. Hammond privately lists the Boca property in *Opulence International Magazine*.

June 5, 2017 – Geoff underwent a medical evaluation by Gaston Perez, M.D., due to increasing symptoms of fatigue. Dr. Perez conducted numerous tests and had blood tests performed. It was noted in Geoff's medical evaluation that he denied any chest pains, shortness of breath, joint pain, nausea, headaches, blurred vision, or stomach issues. Geoff was logged in as being 6'4" and weighed 222 lbs.

June 6, 2017 – All of Geoff's lab work performed at the doctor's office was returned showing no indication of abnormalities, particularly to his thyroid and pituitary gland, and he had normal testosterone levels. He was also tested for lupus and celiac, returning with negative results. Geoff had normal blood pressure and findings of low cholesterol. Dr. Perez gave no explanation for Geoff's symptoms of increased fatigue. Dr. Perez instructed Geoff to continue exercising and follow a low-carb, low-fat, and healthy diet. Geoff was advised that if he experienced or developed any new or worsening symptoms, to seek immediate medical attention **(See Exhibit G)**

June 9, 2017 – David Rosenberg established the "73 Degrees Revocable Trust," which was subsequently used to purchase the Boca property **(See Exhibit H)**

June 10, 2017 – Information developed with evidence that Jayne allegedly backdated and forged vehicle titles for one Ferrari and one Harley Davidson motorcycle. It has been presumed it was she who also backdated and forged the bill of sale for the Harley Davidson. Evidence showed the forgery took place post-death of Paul Geoffrey Hammond, but dates indicated it occurred on June 10, 2017. (See Exhibit I)

June 13, 2017 – Jayne ironically posts a message of death of loved one on her Facebook. (See Exhibit J)

June 14, 2017 – According to witness accounts [REDACTED], Geoff died unexpectedly on this date. According to his wife, Jayne, and first responder reports, Geoff woke up between 7:00 a.m. and 9:30 a.m. According to the 911 medical call by Jayne at 10:09 a.m., she heard a loud noise coming from the third level of their home. Upon inspecting where the noise came from, Jayne found Geoff lying face down in their small study wearing only a black pair of shorts, which she said he commonly slept in.

According to witnesses, David Hammond [REDACTED] had a scheduled 9:00 a.m. conference call between David and Geoff. [REDACTED]. According to witness statements and police reports, Geoff was speculated to have suffered a **cardiac arrest** at 10:00 a.m., possibly caused by a deadly **arrhythmia**. There was no evidence that Geoff and David had done the scheduled call and no evidence of someone calling Geoff to reschedule and/or follow up between 9:00 a.m. and the time of his death around 10:00 a.m.

June 14, 2017 – According to witness statements, Jayne's first call after Geoff died was to CSI general counsel, Barry Weiss, instructing him to make sure the sale of the Boca property closed. On this same date, Jayne also executed an "Intrafamily Transfer and Dissolution" of the Boca property, with her noted as both grantor and grantee. This was documented, date stamped and recorded with Palm Beach County, which appeared to be filed by David Hammond, Jayne's son, or Barry Weiss. There was no evidence of a prior Intrafamily Transfer executed by Geoff. (See Exhibit K)

June 15, 2017 – Jayne posts the same message of death that she did on June 13, 2017, the night prior to Geoff's death. ***"Death Leaves a Heartache No One Can Heal; Love Leaves a Memory No One Can Steal."*** (See Exhibit L)

June 19, 2017 – The wake for Geoff occurred. At the wake and funeral of Geoff, Jayne used her Facebook post from June 13, 2017, the night before Geoff allegedly suffered death from a cardiac arrest. This quote was used on Geoff's Memorial Card. ***"Death Leaves a Heartache No One Can Heal; Love Leaves a Memory No One Can Steal."*** (See Exhibit M)

June 20, 2017 – Geoff's funeral was held. [REDACTED], Rosenberg was heard telling Barry Weiss that the Boca property had to close by the end of the month or, "There was no deal." Barry told Rosenberg that they were trying to secure a death certificate so the transaction would go smoothly.

June 20, 2017 – *Opulence International Magazine* released the listing of the Boca property under Opulence International Realty and David Hammond as agent. David also had the house listed under his name with Opulence International Realty in the winter of 2016 and spring of 2017 issues. (See Exhibit N)

June 23, 2017 – The Boca property closed with the title company Peninsula Title located in Doral, Florida. Interestingly, the Boca property was in Palm Beach County. Peninsula Title was located two counties south of Palm Beach, in Dade county. Without traffic, this title company was approximately an hour away when traveling by car. This raised questions because commonly, most real estate transactions occurred utilizing a title company within a reasonable distance of where the property was located. Furthermore, David Hammond and Opulence International Realty were the closing agents. Barry Weiss was the attorney handling the closing documents for this real estate transaction.

June 23, 2017 – Geoff's 2008 Ferrari and its title were transferred to David Rosenberg, allegedly dated, and forged just four-days prior to Geoff's death. The title was inspected and deemed a forgery by forensic expert and professor, Dr. Fenoff.

June 23, 2017 – According to a UCC filing, Jayne P. Hammond secured "Rosenberg Diamonds & Company LLC, Rosenberg Diamonds & Company, Inc., and David Rosenberg as Individual." Jayne Hammond was listed as the "Secured Party," utilizing the 4.16-carat, GIA Fancy, intense blue-green, cushion-cut, diamond ring as collateral and/or secured asset. (See Exhibit O)

June 27, 2017 – Sale of the Boca property was recorded with the Palm Beach County Public Records Office. (See Exhibit P)

June 27, 2017 – Jayne Hammond attached two affidavits/declarations to the closing documents and subsequently filed these items with the Palm Beach County Clerk of Courts. The affidavits were identified as "Affidavit of Continuous Marriage," and "Affidavit of No Florida or Federal Estate Taxes Due." (See Exhibit Q)

July 2017 – Jayne Hammond listed for sale the 4.16-carat, GIA Fancy, intense blue-green, cushion-cut, diamond ring, on display at Rosenberg Diamond's physical location, as well as on their website, still to this date.

August 17, 2017 – [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] informed [REDACTED] that the sale transaction of the Boca property was fraudulent. [REDACTED] described that Jayne Hammond received a rare diamond as part of the sale transaction regarding the Boca property, and the diamond was deliberately omitted from the closing documents (re reporting income) in order to avoid paying appropriate taxes and doc stamps.

Fall 2017 – David Hammond [REDACTED] article about the diamond ring in *International Opulence Magazine*. A four-page spread was done, and the article stated the owner of the ring had put it on the market.

August 30, 2017 – CSI general counsel, Barry Weiss, sent an email [REDACTED] September 2017 article written by Stephen Joseph titled, ***“Romancing the Stone: Behold the Gem Collector’s Trophy Diamond – The Heart of the Maldives.”***

Barry wrote stating, ***“The issue I have with the way the article is written is that it makes it look like “DR” (David Rosenberg) owns the stone and that he bought it because he had to have it – he doesn’t own it now – moreover, we are taking a completely contrary position on this matter relating both to the house sale as well as to taxes – How can we thread this needle better?”***

It seemed that Barry was trying to avoid exposing was that David Rosenberg was the owner of the diamond ring. This would have implied that Rosenberg used the ring as part of the sales transaction of the Boca property. However, the ring, along with Geoff Hammond’s 2008 Ferrari, were in fact used for this transaction, but purposely not reported, possibly in order to avoid paying taxes for the full purchase price of the house.

September 22, 2017 – The fall *Opulence International Magazine* issue came out with the article entitled, “Romancing the Stone.”

September 2017 – Todd Patterson returns to reside in Florida.

December 20, 2017 – [REDACTED] ***“Yachts, Jewels, Stocks, Trades, Buying Real Estate with Tangibles,”*** was published in *Opulence International Magazine* describing the Boca property transaction, which included the exchange of the 4.16-carat, GIA Fancy, intense blue-green, cushion-cut, diamond ring. [REDACTED]

[REDACTED] Barry then responded stating, ***“I just want to take out any notion that he owned it or ever owned it – it is contrary to our tax reporting positions – I don’t care how this is done – and I don’t think we need to get into any specifics to do so – maybe we can just say he is assisting a wealthy client who has a diversified portfolio of assets with the sale of the diamond.”*** *(See Exhibit R)

COMMENTS/RECOMMENDATIONS

Based on our investigation, there appears to be sufficient evidence to conduct a criminal investigation surrounding the death of Paul Geoffrey Hammond, which should be considered suspicious.

It is believed that Geoff’s wife, Jayne P. Hammond, violated South Carolina statute, Section 16-3-10, Murder. We believe that Jayne Hammond murdered Geoff by [REDACTED] [REDACTED] [REDACTED] [REDACTED] with expressed malice aforethought in the killing of Paul Geoffrey Hammond for financial gain.

Separate from Jayne pre-meditating the execution of murder upon Paul Geoffrey Hammond, we suspect the following co-conspirators assisted Jayne in order for her to conceal evidence, create fraudulent documents, forge legal and official documents, collect life insurance benefits, and to

gain complete control of the business, CSI. We believe that circumstantial evidence will support that Geoff and Jayne's marriage was in jeopardy and Geoff was possibly looking to separate from his wife, Jayne, and/or file for divorce.

Geoff enjoyed the fruits of his labor, hard work, and dedication it took to build the multi-million-dollar company, CSI. Geoff was healthy and enjoyed working in his later years. He did not appear to have confidence in his stepson, David B. Hammond, to manage any part of CSI, let alone control it. He looked at David as being a huge liability to CSI, and in fact demoted David because of his consistent risk and exposure of liability, particularly relative to multiple sexual harassment claims.

As a result of continued sexual harassment claims against David, Geoff terminated his stepson's employment at CSI. However, because Jayne repeatedly demanded that Geoff reemploy David so that he could support his family, Geoff rehired him. With that decision, Geoff also hired and instructed employee Dan Brooke to babysit David in order to keep David in line.

Geoff also terminated his other stepson, Todd Patterson, not once, but on two separate occasions for embezzlement and misappropriation of company funds. Both times Patterson had embezzled hundreds of thousands of dollars and had not repaid the company.

According to witness statements, Jayne was a controlling and manipulative wife towards Geoff and was rude to everyone that crossed her path. She was possessive of Geoff and demanded his constant and full attention. Some witnesses stated that they believed Jayne had been previously diagnosed with bi-polar personality disorder. Witnesses also claimed to have knowledge that Jayne struggled with substance abuse of prescription medication, specifically opiates.

We believe evidence will support that ownership of Geoff and Jayne's Mizner Lakes Estates Drive residential property in Boca Raton created friction between the two, with Jayne's constant demands of Geoff to sell the property. Although Geoff would periodically place the property on the real estate market, he put forth no effort to selling the property, and in fact, took it off market after a few months of it being listed on the MLS.

In order for Jayne to get what she wanted, she would have had to kill Geoff so that she could sell the Mizner Lakes Estates property in a surreptitious agreement between David Rosenberg and herself. This agreement benefitted both Jayne and Rosenberg, and they avoided paying significant federal and state taxes after the sale. This agreement also provided an undocumented exchange of a multimillion-dollar diamond for Jayne and Geoff's prize 2008 black Ferrari, which evidence suggests the title was forged by David B. Hammond and back dated to June 10, 2017. It was well known this was an exotic vehicle that Geoff would not have forfeited.

In addition to the transaction of the Mizner Lake Estates property, and exchange of the rare diamond, and Geoff's 2008 Ferrari, Jayne secured a UCC Filing, using the diamond as collateral, listing David Rosenberg's jewelry store, Rosenberg Diamond & Company, Inc. as "Debtor" and Jayne P. Hammond as "Secured Party." This was filed on June 23, 2017, with the Florida Secured Transaction Registry, at 9:55 a.m. This was also the same date that the Mizner Lake Estates property closed. It should be noted that CSI general counsel, Barry Weiss, filed this document for recording.

Hammond Death Investigation

Intertwined in the sale of the Mizner Lake Estates property, and the murder of Geoff Hammond, there came to be additional criminal activity of creating a fraudulent will and trust, falsifying and forging DMV titles, falsifying legal documents, committing perjury, and concealing multiple assets.

The most disturbing act that occurred on the morning of Geoff's death was it appeared that Jayne directed David B. Hammond to file an Intrafamily-Transfer from a joint property deed, removing Geoff's name as a married couple from the Mizner Lake Estates property and transferring to only Jayne P. Hammond. David recorded this transaction on June 14, 2017, in the Palm Beach County Tax Record for property.

It would seem that Geoff's sudden death did not prevent Jayne from securing her assets. We know that in order for David to record this transaction in the Palm Beach County Tax Record department on June 14th, [REDACTED] It's plausible that Barry Weiss could have also recorded the transaction at the direction of Jayne or David Hammond.

Jayne allegedly had chronic health problems with her back and legs and most seriously, had triple-bypass surgery on February 14, 2017. Although Jayne may have had objective findings that allegedly caused pain and restrictive movement, it was later believed that most, if not all of her ailments had been grossly exaggerated to gain the attention of Geoff and the care he provided for her, coupled with the opportunity to be prescribed prescription medication and controlled substances for pain.

With Jayne's alleged physical restrictions, she demanded to be driven by Geoff whenever traveling away from home. She refused to fly in a plane and walked with a noticeable uneven gait due to her alleged back and knee injuries. However, Jayne's unhealthy diet and weight could have been a contributing factor to her pain and physical restrictions.

Jayne was also described by witnesses as someone that would tell lies to an extreme degree, excessive or markedly abnormal, similar to a person being diagnosed as a pathological liar. For [REDACTED]

Jayne also lead people to believe she attended UCLA where she obtained a Bachelor of Science in Nursing and subsequently worked as a registered nurse. However, our investigation found that to be false. According to the UCLA Nursing Program & Registrar, they had no record that Jayne attended the nursing program or the university. This was confirmed by providing her full name, alias, and Social Security number.

Jayne also alleged that she was employed as a nurse. According to the State of California Board of Registered Nursing, there was no record of any nursing license being issued to her under the names of Jayne Patrice Hermann, Jayne P. Mandel, Jayne P. Patterson, or Jayne P. Hammond.

With Jayne's false claim of being a licensed registered nurse, her alleged education and training, the morning Geoff died, Jayne told the 911 operator that she was unable to determine if Geoff

was breathing or had a pulse. She also told the 911 operator that she was unable to roll Geoff onto his back for further assessment or administer lifesaving treatment. Not only was her alleged nursing career indicated on her LinkedIn profile, but she also alleged a more detailed bio on CSI's website (see below).

Meet our Corporate Management Team

“Life isn't about finding yourself. Life is about creating yourself.”

— George Bernard Shaw



JAYNE HAMMOND

Jayne Hammond, President of CSI International, Inc., was born in Hollywood, California. Jayne, a graduate of UCLA, began her varied business career in the medical industry as an RN at Bel Air Memorial Hospital then as the Director of Administration at The Heart Center. Years later, Jayne made the transition to the hospitality industry providing services to large corporations and in the coordination of special events when she joined Prime Management as the Director of Regional Sales and then eventually, she joined her husband to form CSI. Jayne remains actively involved overseeing the strategic marketing, planning and overall growth of the company.

- Born: Hollywood CA
- UCLA Graduate
- Bel Air Memorial Hospital-RN
- Prime Management – Director Regional Sales
- The Heart Center – Director of Administration
- CSI International, Inc. – President

Even more disturbing than Jayne's lies about her schooling and career, Jayne embellished Geoff's obituary. The following highlighted excerpt is Jayne's version of Geoff's accomplishments, which were completely unfounded and denied by his family.

*“He was commissioned a Second Lieutenant in the U.S. Air Force in May 1969. He served several years and **obtained the rank of Captain.** He furthered his business career by becoming Vice President of American Telephone & Telegraph Company (AT&T). **With a master's degree from Stanford University, with MENSA,** he and his wife started CSI International in 1989.*

Witness statements unanimously and consistently described Jayne as a pretentious woman who belittled those around her. She liked to let others know of her substantial wealth and success in life. It was obvious to others around Jayne that she liked the status of wealth. Where Geoff

preferred large homes and estates, Jayne liked a private-penthouse, condominium lifestyle with a doorman and valet service.

It was also known by some witnesses that Jayne had a substance abuse problem with alcohol, opiates, and other prescription medications. Those same witnesses described the last two years of Geoff's life and marriage as unhappy as he was frustrated with Jayne's overbearing control, rude treatment towards others, and possessiveness. Geoff expressed to a select few that he was unhappy in his marriage and may have been contemplating separation or divorce.

Jayne and her son David had several different versions of how Geoff died, where he was found when he died, and different times of events surrounding his death. This was also followed by unsolicited and spontaneous statements, as stated by witnesses, that were described as suspicious or bizarre, particularly made by Jayne. They are listed as follows:

- You know Geoff and I never fought
- Tara thinks I poisoned her father
- If that were true, I would be in jail
- Geoff was found dead in the master bedroom
- Geoff was found dead outside
- Geoff died on the exercise bike
- Geoff was found dead in our home office
- Geoff died in his sleep
- Geoff died on his back, with his arms crossed and a smile on his face appearing to be completely at peace
- See these bruises on my wrists, that was from me trying to roll Geoff over to administer CPR
- Geoff was found to have my footprints on his back because I was trying to jump on him to get his heart started
- Geoff must have hit the front top of his head on a bookshelf when he fell to the floor

MOTIVE – Financial Gain

Considering Paul Geoffrey Hammond's unexpected and sudden death, he was survived by a large family of five younger brothers and sisters, biological daughter Tara Helman, ten nieces and nephews from his siblings, with one niece being Geoff's Goddaughter. Through his marriage with Jayne, Geoff was survived by two stepsons, one son being allegedly and or legally adopted, and five grandchildren.

Geoff also operated and owned a multimillion-dollar, successful building services company with several subsidiaries, which he was completely and solely vested in, employing over several hundred people, contractors, and vendors. Geoff's business empire was estimated to be worth over \$50,000,000, not including his personal assets.

According to Geoff's 2005 Last Will & Testament, coupled with an alleged trust, which both were found to be fraudulent, Jayne was the one and only beneficiary to Geoff's estate. According to

family members and witnesses, Geoff's marriage to Jayne was facing serious challenges the last couple of years of his life.

With regard to Geoff's alleged trust, assets appeared to be distributed to only Jayne's side of the family and relatives. His alleged trusts were identified as follows:

- Paul Geoffrey Hammond Inter Vivos Trust
- Paul Geoffrey Hammond Residuary Trust
- Paul Geoffrey Hammond Skipping Generation Trust
- Paul Geoffrey Hammond Insurance Trust
- Paul Geoffrey Hammond Qualified Family Residence Trust

According to the alleged aforementioned trust accounts, the following persons were listed as beneficiaries and identified as being from Jayne's side of the family, with the exception of the mothers of Geoff and Jayne.

1. Jayne P. Hammond Trust Part
2. David B. Hammond Trust
3. Todd Patterson Trust
4. Jean Thompson Trust (Jayne's Deceased Mother)
5. Rosemary Hammond Trust (Geoff's Deceased Mother)

There is lack of supporting evidence that all but the Jayne P. Hammond Trust Part are legitimate. Jayne P. Hammond Trust Part appeared to be established in December 2017 or January 2018. However, David B. Hammond does in fact benefit from Geoff's estate now that both Jean Thompson and Rosemary Hammond are deceased as their portions of the estate are distributed to David.

It should also be noted that as business savvy as Geoff was, his business grew substantially subsequent to the alleged 2005 will and trust being created, attaining additional assets in both his personal and business world. Geoff also allegedly created wills in 1995, 1998, 1999, with his alleged final will and created added trusts, there appears to be a huge oversight of not creating an updated will and trust, considering the substantial growth in his assets.

With regard to our investigation related to the 2005 Will & Trust of Paul Geoffrey Hammond, it appeared Jayne P. Hammond and David Brett Hammond committed the following criminal violations:

1. U.S. Code, Title 26 of the Internal Revenue Code, 7201:
 - Evading or Defeating Taxes
2. U.S. Code, Title 26 of the Internal Revenue Code, 641:
 - Imposition of Tax of Estates and/or Property Held in Trust
3. U.S. Code, Title 26 of the Internal Revenue Code, 2001-2010:
 - Imposition and Rate of Tax

Hammond Death Investigation

- Liability for Payment
 - Unified Credit Against Estate Tax
4. Florida Criminal Statute: 319.33 (a), 817, 831, 831.1, & 777.04:
 - Fraud
 - Forgery
 - Conspiracy to Commit Fraud and Forgery

During our investigation, information was developed that appeared to implicate the five listed parties who conspired to commit grand theft, fraud, and forgery. These acts and violations appeared to have also resulted in numerous tax violations. The parties have been identified as:

1. Jayne P. Hammond
2. David Brett Hammond
3. David Rosenberg
4. [REDACTED]
5. Barry Weiss

Investigators obtained numerous documents and witness statements as evidence that directly implicate the above-indicated persons. Some acts described in this report and others obtained and documented over the course of our investigation were conducted by certified experts in two specific fields. One of the experts was consulted to review questionable handwriting and signatures of documents in order to verify their authenticity.

Additionally, three medical experts were consulted and asked to review all medical records pertaining to decedent, Paul Geoffrey Hammond. We then requested they report their individual findings based on their expertise and review of the indicated medical reports, including autopsy and coroner reports.

After careful review of all evidence, documents, conferring with experts in their respective fields, and talking with numerous witnesses, there appears to be sufficient evidence to move forward with a criminal investigation into the death of Paul Geoffrey Hammond at the hands of another.

[REDACTED]

We believe [REDACTED] would have realized that the diamond ring exchanged was worth far more than \$2 million, as per the recent auction sale of comparable properties, “comps” (provided by Rosenberg), describing rare, fancy, intense-colored diamonds similar in size and clarity to the diamond he exchanged, in part, for the Hammond’s Boca property at 373 Mizner Lake Estates Drive in June 2017. However, by removing [REDACTED] or by not renewing her contract as the realtor, this provided Jayne Hammond, David Hammond, and David Rosenberg the opportunity to conceal their efforts in paying the appropriate taxes, doc statements, and sales commission.



We conducted a cost analysis using all available data relative to the listing and sale of the Hammond Boca property, including comps, written articles, and witness statements. The following analysis demonstrates the estimated amount due for relevant taxes, documentation stamps, and sales commission, indicating both criminal and civil violations committed by Jayne Hammond, David Hammond, and David Rosenberg.

1. **Documentation Stamps (Doc Stamps)** – In 2017, Palm Beach County doc stamp taxes were calculated at the rate of \$0.70 per \$100.00 of the value of the sale [Reference: Section 201.02(1)(a), Florida Statutes (F.S.)]. Rosenberg paid doc stamps only on the reported cash in the transaction - \$2,700,000. He failed to pay doc stamp taxes on the value of the diamond ring. The central stone of the diamond ring was a 4.16-carat, GIA Fancy, intense blueish-green diamond.

Regarding the International Opulence magazine article about the diamond ring that was published in September 2017, just three months after Geoff Hammond's death, Rosenberg supplied the editor with a spreadsheet of similar diamond auction comps, which was the traditional way in valuing fine-colored diamonds. The two closest sale comps were a 4.05-carat, fancy, deep-blue diamond that sold at auction on May 17, 2017, for \$4,436,479; and a 3.98-carat, fancy, vivid-blue diamond that sold at auction on May 30, 2017, for \$8,804,557. **(See Exhibit S)**

Furthermore, Rosenberg only provided comps for the center blue diamond and excluded the value of the pink diamonds set in the ring. Based on the price range of blue diamond sale comps, the amount of doc stamps Rosenberg should have paid in the Boca property real estate transaction has been estimated to be in the range of \$31,055 to \$61,631.

Note: According to Florida statutes, if the buyer fails to pay the required doc stamps, then the seller becomes liable for them.

2. **Capital Gains** – A person's capital gains tax rate depends on their marginal tax rate. If the marginal income tax rate is 35 percent, then the long-term capital gains rate is 15 percent. If the marginal tax rate is 39.6 percent, the long-term capital gains rate is 20 percent.

As a result, Jayne Hammond would owe capital gains on the difference between what she and Geoff originally paid for the home \$4,050,000, coupled with the sale price that includes the value of the diamond ring, using the same comp values indicated above in "Section" 1.

From the low end of the diamond sale comp value of \$4,436,479, plus \$2,700,000 cash, this would equal \$397,000 owed, if in the 15 percent capital gains bracket; or \$530,000,

if in the 20 percent capital gains bracket. However, if you factor in the higher blue diamond sale comp value of \$8,804,557, plus \$2,700,000 cash trade for the Boca house, that would equal \$11,504,557 - \$4,050,000 (the amount paid for the house in 2004), which equals \$7,454,557, wherein which the capital gains in the 15 percent bracket would be \$1,118,183.55; or in the 20 percent bracket, \$1,490,911.

3. **Real Estate Commissions owed [REDACTED]** – Using a standard rate of 3-percent sales commissions paid to realtors and depending on her contractual agreement with David Hammond as co-agent, [REDACTED] would be owed a considerable amount of commission for the sale of the Boca property. The \$2,700,000 cash amount and payment of the transaction, Schlinck would be owed \$81,000. If you factor in the range of value for the blue diamond, based on the comp sales in “Section” 1 above, Schlinck would be owed an additional \$133,094 - \$264,136.

Circumstantial Evidence

- The 2005 Will & Trust, dated February 24, 2005, indicated Paul Geoffrey Hammond identified his biological daughter as “Tara Hammond,” and/or his “Issue.” At that time Tara was known as Tara Kerr until June 20, 2005, when she eloped and married Paul Patrick Helman in Las Vegas, Nevada.
- This detail is highlighted because Geoff Hammond would not have referred to his daughter as **Tara Hammond** but would have referred to her using her married name, Tara Kerr. Tara was previously married to Christopher James Kerr on February 22, 2002 but was divorced from him by August of 2003. Tara maintained her married name as Tara Kerr until she married her third husband, Paul Helman. **(See Kerr’s marriage certificate marked as Exhibit T)**

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
 - [REDACTED]
 - Geoff’s previous wills were allegedly generated by [REDACTED] in 1995 and 1998, two additional wills in 1999, and the last one was allegedly drafted in 2005. Interestingly, the 2005 will was only six pages in length and was coupled with a 50-page alleged trust.

All previous wills were allegedly drafted by the same firm, [REDACTED], but were consistently longer in page length, ranging from 37 pages to 41 pages, and this page count did not include the trusts.

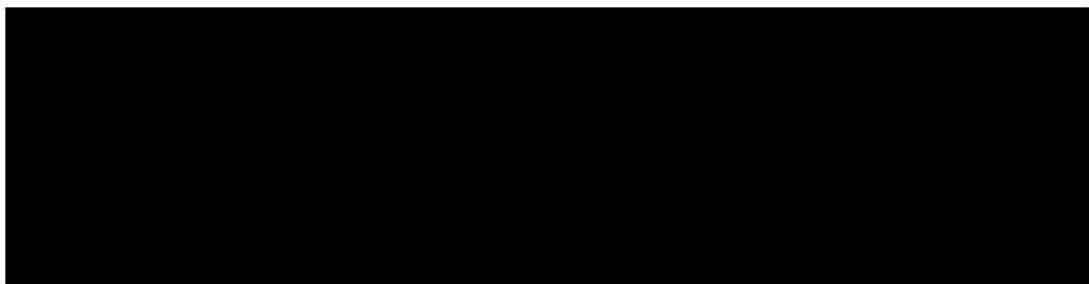
Knowing Geoff was conscientious about keeping his affairs in order, it would seem likely he would have done the same when it came to organizing his wills and trusts. With evidence indicating three wills were allegedly drafted within a four-year period, it would seem reasonable to expect additional drafts of wills after 2005, when his net worth substantially increased.

Furthermore, it would appear more likely than not that Geoff would have designated his only biological child, Tara Helman, as a primary beneficiary. By all witness accounts, he had a positive and healthy relationship with his daughter. The only negative comments made about Tara were generated Jayne.

Questions should be raised about Geoff's alleged decisions to specify his adopted son, David B. Hammond, and his stepson, Todd Lawrence Patterson, as more primary recipients to his estate than Tara, because they caused more problems and liabilities for Geoff, his company, and caused difficulties in his personal life. For example, David had numerous complaints made against him for sexual harassment while he held a position of power at CSI, Geoff's company. Todd embezzled hundreds of thousands of dollars while employed in a position of trust with CSI. Both men caused more complications and liabilities for Geoff and CSI, and they both had known histories of financial instabilities.

Of note, the most damaging evidence of liability was caused by David when he recklessly drove a CSI company vehicle and caused a fatal traffic collision, killing a male driver. Because David was found liable for the accident while driving the company car, CSI paid a large settlement in the wrongful death suit.

- Another inconsistency found in the 2005 trust was when "Geoff" identified five individual corporations or limited liability corporations allegedly created and owned by him. One company that was listed and identified as Geoff's corporation, identified as Trilogy Golf Fitness, Inc., a New Jersey Corporation, was not owned by Geoff, which flags a critical mistake made by the author of the 2005 trust document.



[REDACTED]

- Evidence indicated that on June 23, 2017, Jayne P. Hammond filed as the “Secured Party” for the sale, and the listing “Debtor” was Rosenberg Diamond’s & Co. LLC. This document listed the 4.16 carat, radiant, fancy, intense blue-green, diamond, GIA #210544962. This filing proved that Jayne Hammond received the indicated diamond as an exchange for funds on the private sale of 373 Mizner Lake Dr., the Boca Raton, Florida estate. The date of June 23, 2017 was the closing date for this property when it was sold to David Rosenberg.
- Evidence gathered indicates on April 27, 2017, David Rosenberg purchased the remaining shares from AMGAD Inc. a diamond wholesaler in New York. During this time, Rosenberg had a previous “Secured Party,” identified as Roy Herzl, Inc. For Rosenberg to purchase his shares of the 4.16 carat radiant diamond, it indicated he used it to purchase the Mizner Lake Estates property, implicating both Rosenberg and Jayne regarding the property’s sale in partial exchange using the diamond. This information was obtained in a short telephonic interview with [REDACTED]
- Evidence was obtained that revealed a Paul Geoffrey Hammond Insurance Trust was listed on IRS Form, 8879-F, filed from June 14 through December 31, 2017 by accounting firm [REDACTED]. This evidences that another trust for Paul Geoffrey Hammond existed and it may indicate an additional will was drafted after 2005. There was no mention of this trust in the 1999 will or the 2005 Will & Trust. **(Exhibit V)**
- Evidence was also obtained from [REDACTED] that had a recent May 30, 2020 financial report included. This identified the account attached to P. Geoffrey Hammond and Under Agreement, dated May 5, 1999, the exact execution date of the 1999 will. The 1999 copy also had inconsistencies with formatting, suggesting to this investigator that the original document warranted examination. [REDACTED]

Interestingly, as we neared completion of our investigation into the validity of the 2005 Will & Trust, there were three recent, suspicious, and “coincidental” events that occurred surrounding personal property of Tara Helman.

[REDACTED]

Hammond Death Investigation

[REDACTED]

[REDACTED]

Based on the above-indicated burglary and evidence of Internet intrusion, we recommend that a preservation letter be sent to [REDACTED] to preserve all evidence that would document and help identify who and how suspect(s) gained unauthorized access to Helman's email and her social media platform, what security changes were made, and identify the phone number used when changing security settings to her email account through the [REDACTED]

We recommend that the criminal violations for fraud, forgery, and tax evasion be referred to the Palm Beach County District Attorney's Office for further investigation and possible criminal filing. We also recommend that the Bluffton County Sheriff's Office, investigate Jayne P. Hammond, for the murder for financial gain of Paul Geoffrey Hammond.

We recommend that preservation letters be sent to [REDACTED] to preserve evidence of Jayne's [REDACTED]. We recommend obtaining warrants for the cell phone records, data plans, and internet searches for cell phones, computers, and other electronic devices for the following persons.

- **Jayne P. Hammond**
- **David Brett Hammond**
- **Barry Alan Weiss**
- **Todd Lawrence Patterson**
- [REDACTED]
- **David Rosenberg**
- [REDACTED]

We also recommend that both the Bluffton County Sheriff's Office and the Boca Police Department work together to investigate their respective jurisdiction criminal violations.

Hammond Death Investigation

We strongly recommend that the Bluffton County Sheriff's Office attempt to collect enough evidence in order to secure a warrant for [REDACTED]
[REDACTED]

Respectfully,

A handwritten signature in black ink, appearing to read "Joseph R. Dalu". The signature is stylized with a large, looping initial "J" and a circular flourish at the end.

Joseph R. Dalu
Premier Group International