

**IN THE CIRCUIT/COUNTY COURT OF THE SEVENTEENTH JUDICIAL
CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA**

STATE OF FLORIDA

vs.

WARRANT TO ARREST

**ROBERTO MARTINEZ,
H/M, DOB: 4/12/1971**

_____ /

COUNT 1

ORGANIZED SCHEME TO DEFRAUD, 1° F

**IN THE NAME OF THE STATE OF FLORIDA, TO ALL AND SINGULAR THE SHERIFFS
AND CONSTABLES OF THE STATE OF FLORIDA:**

WHEREAS, JOHN CALABRO has this day made oath before me that that beginning on or about the 1st day of May 2014 and continuing through on or about the 30th day of July 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, Patricia Eugene, Dim Villarson, Denis Eugene and Gawens St Victor, did then and there engage in a continuing scheme to defraud, to wit: a systematic, ongoing course of conduct with intent to defraud one or more persons, or with intent to obtain property from one or more persons by false or fraudulent pretenses, representations, or promises or willful misrepresentations of a future act, thereby obtaining property of an aggregate value of more than fifty thousand dollars (\$50,000.00), the property of others, to-wit: United States Currency or other consideration from Bank of America, N.A., Allan A. Simpson, Ralph Rivas, Jorge O. Iglesias, Norma Canales fka Norma Salazar, Broward County Records and Treasury Division and others, of a right to the property, or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled thereto, contrary to Section 817.034(4)(a)1, Florida Statutes.

COUNT 2

MONEY LAUNDERING, 1° F

WHEREAS, JOHN CALABRO has this day made oath before me that beginning on or about the 1st day of May 2014 and continuing through on or about the 30th day of July 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, Patricia Eugene, Dim Villarson and Gawens St Victor did then and there unlawfully, knowing that the property involved in a financial transaction represented the proceed of some unlawful activity, conduct or attempt to conduct a financial transaction involving the proceeds of specified unlawful activity, to wit: forgery and/or theft and/or fraudulent use of personal identification information, with the intent to promote the carrying on

of said specified unlawful activity and/or knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, source ownership, or control of the proceeds of said unlawful activity or to avoid a transaction reporting requirement or money transmitters' registration requirements under state law, said financial transaction(s) totaling or exceeding one hundred thousand dollars or more (\$100,000) in the 12-month period ending, in violation of Section 896.101(3) and Section 896.101(5)(c) Florida Statutes.

COUNT 3

GRAND THEFT, 1° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 22nd day of July 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Bank of America, N.A., and Broward County Records and Treasury Division, to wit: the value of one hundred thousand dollars or more (\$100,000), with intent to either temporarily or permanently deprive Bank of America, N.A and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(a)1, Florida Statutes.

COUNT 4

FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION, 1° F

WHEREAS, JOHN CALABRO has this day made oath before me that beginning on or about the 15th day of October 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Joshua L. Katruska, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was fifty thousand (50,000) or more, contrary to Section 817.568(2)(c), Florida Statutes.

COUNT 5

OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 22nd day of July 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 6**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 15th day of October 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited & Specific Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Bank of America, N.A., and Broward County Records, Taxes and Treasury Division, in violation of Section 831.02, Florida Statutes.

COUNT 7**GRAND THEFT, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that beginning on or about the 24th day of March 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Dim Villarson, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Allan A. Simpson and Broward County Records and Treasury Division, to wit: the value of one hundred thousand dollars or more (\$100,000), with intent to either temporarily or permanently deprive Allan A. Simpson and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(a)1, Florida Statutes.

COUNT 8**FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that beginning on or about the 27th day of February 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Dim Villarson, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Allan A. Simpson, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was fifty thousand (50,000) or more, contrary to Section 817.568(2)(c), Florida Statutes.

COUNT 9**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that beginning on or about the 24th day of March 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 10**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27th day of February 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Dim Villarson, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Allan A. Simpson, in violation of Section 831.02, Florida Statutes.

COUNT 11**GRAND THEFT, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 8th day of May 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Patricia Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Ralph Rivas and Broward County Records and Treasury Division, to wit: the value of one hundred thousand dollars or more (\$100,000), with intent to either temporarily or permanently deprive Ralph Rivas and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(a)1, Florida Statutes.

COUNT 12**FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 26th day of April 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Patricia Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Ralph Rivas, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was fifty thousand (50,000) or more, contrary to Section 817.568(2)(c), Florida Statutes.

COUNT 13**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 8th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 14**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 26th day of April 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Ralph Rivas, in violation of Section 831.02, Florida Statutes.

COUNT 15**GRAND THEFT, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 24th day of June 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Jorge O. Iglesias and Broward County Records and Treasury Division, to wit: the value of one hundred thousand dollars or more (\$100,000), with intent to either temporarily or permanently deprive Jorge O. Iglesias and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(a)1, Florida Statutes.

COUNT 16**FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 13th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Jorge O. Iglesias, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was fifty thousand (50,000) or more, contrary to Section 817.568(2)(c), Florida Statutes.

COUNT 17**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 24th day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 18**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 13th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Jorge O. Iglesias, in violation of Section 831.02, Florida Statutes.

COUNT 19**GRAND THEFT, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 3rd day of November 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Guy Urciuoli and Broward County Records and Treasury Division, to wit: the value of one hundred thousand dollars or more (\$100,000), with intent to either temporarily or permanently deprive Guy Urciuoli and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(a)1, Florida Statutes.

COUNT 20**FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 19th day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Guy Urciuoli, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was fifty thousand (50,000) or more, contrary to Section 817.568(2)(c), Florida Statutes.

COUNT 21**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 3rd day of November 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 22**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 19th day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Guy Urciuoli, in violation of Section 831.02, Florida Statutes.

COUNT 23
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 15th day of May 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Amber Lee Forrester fka Amber Nicole Lee and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Amber Lee Forrester fka Amber Nicole Lee and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 24
FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 1° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 17th day of April 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Amber Lee Forrester fka Amber Nicole Lee, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was fifty thousand (50,000) or more, contrary to Section 817.568(2)(c), Florida Statutes.

COUNT 25
OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 15th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 26
UTTERING FORGED INSTRUMENT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 17th day of April 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Amber Lee Forrester fka Amber Nicole Lee, in violation of Section 831.02, Florida Statutes.

COUNT 27
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27th day of July 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Sally Gordon and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Sally Gordon and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 28

FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 1° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 16th day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Sally Gordon, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was fifty thousand (50,000) or more, contrary to Section 817.568(2)(c), Florida Statutes.

COUNT 29

OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27th day of July 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 30

UTTERING FORGED INSTRUMENT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 16th day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Sally Gordon, in violation of Section 831.02, Florida Statutes.

COUNT 31**GRAND THEFT, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 6th day of August 2014, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor and Denis Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Eladia Lugo and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Eladia Lugo and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 32**FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 30th day of May 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor and Denis Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Eladia Lugo, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was fifty thousand (50,000) or more, contrary to Section 817.568(2)(c), Florida Statutes.

COUNT 33**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 6th day of August 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 34**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 30th day of May 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with in concert with Gawens St Victor and Denis Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Amber Lee Forrester fka Amber Nicole Lee, in violation of Section 831.02, Florida Statutes.

COUNT 35**GRAND THEFT, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 16th day of May 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Edmunda Castillon and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Edmunda Castillon and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 36**FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION, 1° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 30th day of April 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Edmunda Castillon, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was fifty thousand (50,000) or more, contrary to Section 817.568(2)(c), Florida Statutes.

COUNT 37**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 16th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 38**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 30th day of April 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Edmunda Castillon, in violation of Section 831.02, Florida Statutes.

COUNT 39
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 15th day of May 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Cassandra Ferguson and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Cassandra Ferguson and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 40
FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 6th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Cassandra Ferguson, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 41
OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 15th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 42
UTTERING FORGED INSTRUMENT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 6th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Cassandra Ferguson, in violation of Section 831.02, Florida Statutes.

COUNT 43**GRAND THEFT, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 12th day of August 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Miguel Grillo and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Miguel Grillo and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 44**FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 21st day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Miguel Grillo, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 45**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 12th day of August 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 46**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 21st day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Miguel Grillo, in violation of Section 831.02, Florida Statutes.

COUNT 47**GRAND THEFT, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 25th day of June 2014, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Denis Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Sharon Prigmore and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Sharon Prigmore and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 48**FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 17st day of May 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Denis Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Sharon Prigmore, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 49**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 25st day of June 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 50**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 17th day of May 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Denis Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Sharon Prigmore, in violation of Section 831.02, Florida Statutes.

COUNT 51
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 30th day of July 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Patricia Eugene and Denis Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Norma Canales fka Norma Salazar and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Norma Canales fka Norma Salazar and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 52
FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 2nd day of June 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Patricia Eugene and Denis Eugene did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Norma Canales fka Norma Salazar, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 53
OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 30th day of July 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 54
UTTERING FORGED INSTRUMENT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 2nd day of June 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Patricia Eugene and Denis Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Norma Canales fka Norma Salazar, in violation of Section 831.02, Florida Statutes.

COUNT 55
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 12th day of August 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Kenneth Medina and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Kenneth Medina and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 56

FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 7th day of July 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, , in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Kenneth Medina, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 57

OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 12th day of August 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 58

UTTERING FORGED INSTRUMENT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 7th day of July 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, , in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Kenneth Medina, in violation of Section 831.02, Florida Statutes.

COUNT 59
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 6th day of July 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Catherine M. Marin and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Catherine M. Marin and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 60
FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 18th day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, , in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Catherine M. Marin, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 61
OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 6th day of July 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 62
UTTERING FORGED INSTRUMENT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 18th day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, , in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Catherine M. Marin, in violation of Section 831.02, Florida Statutes.

COUNT 63
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 29th day of January 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Shay Sasson and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Shay Sasson and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 64

FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about 27th day of December 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Shay Sasson, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 65

OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 29th day of January 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 66

UTTERING FORGED INSTRUMENT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27th day of December 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Shay Sasson, in violation of Section 831.02, Florida Statutes.

COUNT 67
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 30th day of October 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor and Denis Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of David Harden and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive David Harden and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 68

FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about 25th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor and Denis Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: David Harden, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 69

OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 30th day of November 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 70

UTTERING FORGED INSTRUMENT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 25th day of May 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor and Denis Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud David Harden, in violation of Section 831.02, Florida Statutes.

COUNT 71
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 28th day of October 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Roger A. Lewis and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Roger A. Lewis and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 72

FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 25th day of September 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Roger A. Lewis, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 73
OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 28th day of October 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 74
UTTERING FORGED INSTRUMENT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 25th day of September 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Roger A. Lewis, in violation of Section 831.02, Florida Statutes.

COUNT 75
GRAND THEFT, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 24th day of August 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Darryl W. Jordan and Broward County Records and Treasury Division, to wit: the value of twenty thousand dollars or more (\$20,000), with intent to either temporarily or permanently deprive Darryl W. Jordan and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(b)1, Florida Statutes.

COUNT 76

FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 6th day of September 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Darryl W. Jordan, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 77

OFFICIAL MISCONDUCT, 3° F

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 24th day of August 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 78

UTTERING FORGED INSTRUMENT, 3°

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 6th day of September 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Darryl W. Jordan, in violation of Section 831.02, Florida Statutes.

COUNT 79**GRAND THEFT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 23rd day of June 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of James H. Bleakley and Broward County Records and Treasury Division, to wit: the value of three hundred dollars or more (\$300), with intent to either temporarily or permanently deprive James H. Bleakley and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(c)3, Florida Statutes.

COUNT 80**FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 17th day of January 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: James H. Bleakley, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 81**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 23rd day of June 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 82**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 17th day of January 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud James H. Bleakley, in violation of Section 831.02, Florida Statutes.

COUNT 83**GRAND THEFT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 16th day of June 2015, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Ira Matsil and Broward County Records and Treasury Division, to wit: the value of three hundred dollars or more (\$300), with intent to either temporarily or permanently deprive Ira Matsil and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(c)3, Florida Statutes.

COUNT 84**FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 11th day of June 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Ira Matsil, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 85**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 16th day of June 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 86**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 11th day of June 2014, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Ira Matsil, in violation of Section 831.02, Florida Statutes.

COUNT 87**GRAND THEFT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 29th day of January 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Eleanor A. Bruhl and Broward County Records and Treasury Division, to wit: the value of three hundred dollars or more (\$300), with intent to either temporarily or permanently deprive Eleanor A. Bruhl and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(c)2, Florida Statutes.

COUNT 88**FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27th day of December 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, , in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Eleanor A. Bruhl, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 89**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 29th day of January 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 90**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 27th day of December 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Eleanor A. Bruhl, in violation of Section 831.02, Florida Statutes.

COUNT 91**GRAND THEFT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 28th day of January 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Reginald Ware and Broward County Records and Treasury Division, to wit: the value of three hundred dollars or more (\$300), with intent to either temporarily or permanently deprive Reginald Ware and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(c)2, Florida Statutes.

COUNT 92**FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION, 2° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 29th day of December 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, , in concert with Marc Eugene, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Reginald Ware, without first obtaining that individual's consent, and the pecuniary benefit, value of services received, payment sought to be avoided, or the amount of the injury or fraud was five thousand dollars (5,000) or more, contrary to Section 817.568(2)(b), Florida Statutes.

COUNT 93**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 28th day of January 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 94**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 29th day of December 2015, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Reginald Ware, in violation of Section 831.02, Florida Statutes.

COUNT 95**GRAND THEFT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 24th day of June 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Bernard Boucher and Broward County Records and Treasury Division, to wit: the value of three hundred dollars or more (\$300), with intent to either temporarily or permanently deprive Bernard Boucher and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(c)1, Florida Statutes.

COUNT 96**FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 11th day of March 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Bernard Boucher, without first obtaining that individual's consent, contrary to Section 817.568(2)(a), Florida Statutes.

COUNT 97**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 24th day of June 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 98**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 11th day of March 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Bernard Boucher, in violation of Section 831.02, Florida Statutes.

COUNT 99**GRAND THEFT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 16th day of May 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Brooks Hires Jr. and Broward County Records and Treasury Division, to wit: the value of three hundred dollars or more (\$300), with intent to either temporarily or permanently deprive Brooks Hires Jr. and Broward County Records and Treasury Division of the right to the property or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled to the use of the property, contrary to Section 812.014(2)(c)1, Florida Statutes.

COUNT 100**FRAUDULENT USE OF PERSONAL
IDENTIFICATION INFORMATION, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 4th day of January 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there willfully and without authorization fraudulently use personal identification information concerning an individual, to wit: Brooks Hires Jr., without first obtaining that individual's consent, contrary to Section 817.568(2)(a), Florida Statutes.

COUNT 101**OFFICIAL MISCONDUCT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 16th day of May 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, while employed by the Broward County Records and Treasury Division, did knowingly and intentionally obtain a benefit by falsifying official records belonging to a public office, to-wit: Broward County Records and Treasury Division, contrary to Section 838.022(1)(a), Florida Statutes.

COUNT 102**UTTERING FORGED INSTRUMENT, 3° F**

WHEREAS, JOHN CALABRO has this day made oath before me that on or about the 4th day of January 2016, in the County aforesaid, one **ROBERTO MARTINEZ**, in concert with Gawens St Victor, did then and there unlawfully utter and publish as true to Broward County Records, Taxes and Treasury Division, a false, forged, or altered instrument in writing of the following tenor and effect: "Limited Power of Attorney", knowing the same to be false, altered, forged or counterfeited, with the intent to injure or defraud Brooks Hires Jr., in violation of Section 831.02, Florida Statutes.

17-247 AFU

The offenses set forth in the foregoing Warrant are contrary to the statute in such case made and provided, and against the peace and dignity of the State of Florida. Attached hereto and made a part hereof by incorporation is the Affidavit executed by JOHN CALABRO, Affiant herein.

THESE ARE, THEREFORE, to command you forthwith to arrest the said **ROBERTO MARTINEZ**, and bring him before me to dealt with according to law.

Given under my hand and seal this 5 day of July, A.D. 2017.



HONORABLE
Judge of the Circuit Court

17-247AF10

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA

Plaintiff,

vs.

ORDER SETTING BOND

ROBERTO MARTINEZ

H/M, DOB: 4/12/1971

Defendant,

The court hereby sets bond in the above-captioned case as follows:

COUNT 1: ORGANIZED SCHEME TO DEFRAUD

1° Felony, F.S. 817.034(4)(a)1

Bond: 25,000⁰⁰

COUNT 2: MONEY LAUNDERING

1° Felony, F.S. 896.101(3) & 896.101(5)(c)

Bond: 25,000⁰⁰

COUNT 3: GRAND THEFT

1° Felony, F.S. 812.014(2)(a)1

Bond: 25,000⁰⁰

COUNT 4: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(c)

Bond: 25,000⁰⁰

COUNT 5: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 6: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 7: GRAND THEFT

1° Felony, F.S. 812.014(2)(a)1

Bond: 25,000⁰⁰

17-247AFIO

COUNT 8: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(c)

Bond: 25,000⁰⁰

COUNT 9: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 10: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 11: GRAND THEFT

1° Felony, F.S. 812.014(2)(a)1

Bond: 25,000⁰⁰

COUNT 12: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(c)

Bond: 25,000⁰⁰

COUNT 13: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 14: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 15: GRAND THEFT

1° Felony, F.S. 812.014(2)(a)1

Bond: 25,000⁰⁰

COUNT 16: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(c)

Bond: 25,000⁰⁰

COUNT 17: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 18: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 19: GRAND THEFT

1° Felony, F.S. 812.014(2)(a)1

Bond: 25,000⁰⁰

COUNT 20: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(c)

Bond: 25,000⁰⁰

17-247AF10

COUNT 21: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 22: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 23: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 24: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(c)

Bond: 25,000⁰⁰

COUNT 25: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 26: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 27: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 28: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(c)

Bond: 25,000⁰⁰

COUNT 29: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 30: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 31: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 32: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(c)

Bond: 25,000⁰⁰

COUNT 33: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

17-247AFIO

COUNT 34: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 35: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 36: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(c)

Bond: 25,000⁰⁰

COUNT 37: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 38: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 39: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 40: FRAUD USE OF PERSONAL ID INFO

2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 41: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 42: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 43: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 44: FRAUD USE OF PERSONAL ID INFO

2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 45: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 46: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

17-247AFIO

COUNT 47: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 48: FRAUD USE OF PERSONAL ID INFO

2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 49: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 50: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 51: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 52: FRAUD USE OF PERSONAL ID INFO

1° Felony, F.S. 817.568(2)(b)

Bond: 25,000⁰⁰

COUNT 53: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 2,000⁰⁰

COUNT 54: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 55: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 56: FRAUD USE OF PERSONAL ID INFO

2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 57: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 8,000⁰⁰

COUNT 58: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 59: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

17-247AF10

COUNT 60: FRAUD USE OF PERSONAL ID INFO
2° Felony, F.S. 817.568(2)(b)

Bond: 3,000⁰⁰

COUNT 61: OFFICIAL MISCONDUCT
3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 62: UTTERING FORGED INSTRUMENT
3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 63: GRAND THEFT
2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 64: FRAUD USE OF PERSONAL ID INFO
2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 65: OFFICIAL MISCONDUCT
3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 66: UTTERING FORGED INSTRUMENT
3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 67: GRAND THEFT
2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 68: FRAUD USE OF PERSONAL ID INFO
2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 69: OFFICIAL MISCONDUCT
3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 70: UTTERING FORGED INSTRUMENT
3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 71: GRAND THEFT
2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

17-247 AF10

COUNT 72: FRAUD USE OF PERSONAL ID INFO

2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 73: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 74: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 75: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 76: FRAUD USE OF PERSONAL ID INFO

2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 77: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 78: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 79: GRAND THEFT

2° Felony, F.S. 812.014(2)(b)1

Bond: 7,500⁰⁰

COUNT 80: FRAUD USE OF PERSONAL ID INFO

2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 81: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 82: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 83: GRAND THEFT

3° Felony, F.S. 812.014(2)(c)3

Bond: 5,000⁰⁰

COUNT 84: FRAUD USE OF PERSONAL ID INFO
2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 85: OFFICIAL MISCONDUCT
3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 86: UTTERING FORGED INSTRUMENT
3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 87: GRAND THEFT
3° Felony, F.S. 812.014(2)(c)2

Bond: 5,000⁰⁰

COUNT 88: FRAUD USE OF PERSONAL ID INFO
2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 89: OFFICIAL MISCONDUCT
3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 90: UTTERING FORGED INSTRUMENT
3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 91: GRAND THEFT
3° Felony, F.S. 812.014(2)(c)2

Bond: 5,000⁰⁰

COUNT 92: FRAUD USE OF PERSONAL ID INFO
2° Felony, F.S. 817.568(2)(b)

Bond: 7,500⁰⁰

COUNT 93: OFFICIAL MISCONDUCT
3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 94: UTTERING FORGED INSTRUMENT
3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 95: GRAND THEFT
3° Felony, F.S. 812.014(2)(c)1

Bond: 5,000⁰⁰

17-247AFD

COUNT 96: FRAUD USE OF PERSONAL ID INFO

3° Felony, F.S. 817.568(2)(a)

Bond: 5,000⁰⁰

COUNT 97: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 98: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

Bond: 5,000⁰⁰

COUNT 99: GRAND THEFT

3° Felony, F.S. 812.014(2)(c)1

Bond: 5,000⁰⁰

COUNT 100: FRAUD USE OF PERSONAL ID INFO

3° Felony, F.S. 817.568(2)(a)

Bond: 5,000⁰⁰

COUNT 101: OFFICIAL MISCONDUCT

3° Felony, F.S. 838.022(1)(a)

Bond: 5,000⁰⁰

COUNT 102: UTTERING FORGED INSTRUMENT

3° Felony, F.S. 831.02

\$ 5,000⁰⁰
\$ 915,000⁰⁰

TOTAL BOND:

SPECIAL BOND CONDITIONS

1. The Defendant shall secure his release pursuant to a surety bond that is fully collateralized, net asset value of the collateral must be in an amount equal to or in excess of bond amounts. *Property*
2. Prior to the Defendant's release, the Defendant must fulfill a Nebbia requirement wherein the Defendant will submit for the State's review documentation showing proof that the bond is fully collateralized and the legality of the funds used for both the bond premium and bond collateral. The State or Defendant has the right to object and request a further hearing as to the sufficiency of collateral and legality of the funds.
3. Any property used to collateralize the bond shall not be further encumbered or liquidated during the pendency of the bond.
4. Only after the Court's subsequent review and issuance of an Order approving the Nebbia requirement of the legality of the funds and sufficiency of the collateral, will the Defendant then be eligible for release upon the posting of the said bond.

5. The Surety shall provide to the State an updated title search within ten (10) days of the Defendant's release reflecting recorded mortgages on the properties utilized for bond collateral.
6. The Defendant will be monitored by Pretrial Services with further requirements of Level Two monitoring and GPS.
7. The Defendant will not possess any firearms.
8. The Defendant shall surrender his passport and it shall remain in the custody of the Broward County Clerk and the Defendant shall not reapply for any passport.

Given under my hand and seal this 5 day of July, A.D. 2017, at Fort Lauderdale, Broward County, Florida.



HONORABLE Alvin Stegel
Judge of the Circuit Court

**A TRUE COPY
Circuit Court Seal**

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA :

Plaintiff, :

vs. :

AFFIDAVIT TO ARREST

ROBERTO MARTINEZ :

MARC H. EUGENE :

PATRICIA EUGENE :

DIM VILLARSON :

DENIS EUGENE :

GAWENS ST VICTOR :

Defendants, :

..... :

BEFORE ME Andrew Siegel Judge of the Circuit Court in and for Broward County, personally came, Detective John Calabro of the Broward County Sheriff's Office, who, after being duly sworn, deposes and said that beginning on or about the 1st day of May 2014 and continuing through on or about the 30th day of July 2016, in the County and State aforesaid, one **ROBERTO MARTINEZ**, in concert with Marc Eugene, Patricia Eugene, Dim Villarson, Denis Eugene and Gawens St Victor, did then and there engage in a continuing scheme to defraud, to wit: a systematic, ongoing course of conduct with intent to defraud one or more persons, or with intent to obtain property from one or more persons by false or fraudulent pretenses, representations, or promises or willful misrepresentations of a future act, thereby obtaining property of an aggregate value of more than fifty thousand dollars (\$50,000.00), the property of others, to-wit: United States Currency or other consideration from Bank of America, N.A., Allan A. Simpson, Ralph Rivas, Jorge O. Iglesias, Guy Urcioli, Amber Lee Forrester, Sally Gordon, Eladia Lugo, Edmunda Castellon, Cassandra Ferguson, Miguel Grillo, Sharon Prigmore, Norma Canales fka Norma Salazar, Kenneth Medina, Catherine M. Marin, Shay Sasson David harden, Roger A. Lewis, Darryl Jordan, James H. Bleakley, Ira Matsil, Eleanor A. Bruhl, Reginald Ware, Bernard Boucher, Brooks Hires and Broward County Records and Treasury Division and others, of a right to the property, or a benefit therefrom, or to appropriate the property to his own use or the use of a person not entitled thereto, contrary to Section 817.034(4)(a)1, Grand Theft 812.014, Money Laundering 896.101(3), Uttering Forged Instrument 831.02, and in Martinez case with Official Misconduct 838.022(1)(a), Florida Statutes.

Your Affiant met with Thomas Kennedy, Director and Claudio Manicone, Senior Manager of Broward County Taxes & Treasury Division. Kennedy and Manicone stated that they conducted an investigation into Roberto Martinez, an employee in RTT when numerous tax deed surplus checks were fraudulently issued. Manicone stated that a well-known third party debt collector, Global Discovery, a company that often represents claimants on tax deed surplus recovery, informed RTT that

checks that were supposed to be paid to two of its clients were paid to Nu Concepts Investments LLC. As he continued to investigate Manicone stated that he found besides Nu Concept Investments LLC, several other entities involved in this tax deed surplus fraud, CSC Equity Fund LLC, Concrete Capital L.L.C., Choice One Investments L.L.C., Unsettled Mgmt Asset Inc., Bridge Connect Solution Investment LLC, Givanna Consulting LLC and Gawens St Victor (hereinafter referred to as "Fraudulent Entities"). Manicone also stated that RTT received a subpoena from the Miami-Dade State Attorney, relative to an investigation delving into Broward County tax deed surplus checks having been paid to "Fraudulent Entities". In each case, Marc Eugene, Patricia Eugene, Dim Villarson, Denis Eugene and Gawens St Victor on behalf of the "Fraudulent Entities", submitted to RTT forged "Limited Power of Attorney" documents, diverting tax deed surplus funds from victims. During 2014, 2015 and 2016, twenty-eight (28) fraudulent tax deed surplus refund checks were issued by RTT, to "Fraudulent Entities" totaling \$1,607,412.76, as follows:


CHK DATE	AMOUNT	PAID TO	FORGED POA	VICTIM NAME
7/22/2016	\$274,068.39	BRIDGE CONNECT SOLUTION INV	10/15/2015	BANK of AMERICA, N.A.
3/24/2016	\$179,472.23	CHOICE ONE INVESTMENTS LLC	2/27/2016	ALLAN A. SIMPSON
5/8/2015	\$161,686.48	CONCRETE CAPITAL LLC	4/26/2015	RALPH RIVAS
6/24/2015	\$151,757.98	CSC EQUITY FUND LLC	5/13/2015	JORGE O. IGLESIAS
11/3/2015	\$111,300.42	NU CONCEPT INVESTMENTS LLC	6/19/2015	GUY URCIUOLI
5/15/2015	\$83,306.06	CSC EQUITY FUND LLC	4/17/2015	AMBER LEE FORRESTER
7/27/2015	\$75,092.80	CSC EQUITY FUND LLC	6/16/2015	SALLY GORDON
8/6/2014	\$73,876.05	GAWENS ST VICTOR	5/30/2014	ELADIA LUGO TRUSTEE
5/16/2015	\$61,211.26	NU CONCEPT INVESTMENTS LLC	4/30/2015	EDMUNDA CASTELLON
5/15/2015	\$48,008.81	NU CONCEPT INVESTMENTS LLC	5/6/2015	CASSANDRA T. FERGUSON
8/12/2015	\$39,696.87	NU CONCEPT INVESTMENTS LLC	6/21/2015	MIGUEL GRILLO
6/25/2014	\$36,687.06	DENIS EUGENE	5/17/2014	SHARON PRIGMORE
7/30/2015	\$34,435.22	CONCRETE CAPITAL LLC	6/2/2014	NORMA CANALES
7/27/2015	\$33,784.87	NU CONCEPT INVESTMENTS LLC	6/21/2015	ADRIEL G. PATINO
3/24/2016	\$32,372.93	GIVANNA CONSULTING LLC	3/6/2016	YASNIELA FLORES
8/12/2015	\$27,085.13	NU CONCEPT INVESTMENTS LLC	7/7/2015	KENNETH MEDINA
7/6/2015	\$24,630.01	CSC EQUITY FUND LLC	6/18/2015	CATHERINE M. MARIN
1/29/2016	\$24,822.89	NU CONCEPT INVESTMENTS LLC	12/27/2015	SHAY SASSON
10/30/2015	\$21,227.85	CONCRETE CAPITAL LLC	5/25/2015	DAVID HARDEN
10/28/2015	\$21,174.48	CSC EQUITY FUND LLC	9/25/2015	ROGER ALAN LEWIS
8/24/2015	\$20,058.62	NU CONCEPT INVESTMENTS LLC	9/6/2015	DARRYL W. JORDAN
6/23/2016	\$19,439.84	GIVANNA CONSULTING LLC	1/17/2016	JAMES H. BLEAKLEY III
6/16/2015	\$16,777.29	UNSETTLED MGMT ASSET INC.	6/11/2014	IRA MATSIL
5/16/2015	\$15,645.56	UNSETTLED MGMT ASSET INC.	6/9/2014	JOHN E. HARDY
1/29/2016	\$7,083.07	NU CONCEPT INVESTMENTS LLC	12/27/2015	ELEANOR A. BRUHL
1/28/2016	\$5,383.31	NU CONCEPT INVESTMENTS LLC	12/29/2015	REGINALD WARE
6/24/2016	\$4,479.36	BRIDGE CONNECT SOLUTION INV	3/11/2016	BERNARD BOUCHER
5/16/2016	\$2,847.92	GIVANNA CONSULTING LLC	1/4/2016	BROOKS HIRES JR.
TOTAL:	\$1,607,412.76			

Manicone stated that all the above listed fraudulent tax deed surplus payment vouchers were submitted by RTT employee Roberto Martinez and perfunctorily approved by his supervisor Rebecca Leder. Martinez was the RTT employee who handled each file and was charged with following the requirements of F.S. 197.502, governing the sale of tax deeds. Manicone stated that as it relates to the twenty-eight checks issued to "Fraudulent Entities", Martinez violated Section 197.502 as follows:

- In twelve claims Martinez submitted "Accelerated Payment Requests";
- In nine claims Martinez submitted payment requests lacking required Attorney review;
- In nine claims Martinez submitted payment requests in conflict with Attorney's Review and Disposition.
- Martinez failed to maintain notes in the County system as required by policy.

Sworn statements and notarized affidavits were provided by eighteen victims whose tax deed refund checks were vouchered by Martinez and paid to "Fraudulent Entities" linked to Mark Eugene, Patricia Eugene, Gawens St Victor, Dim Villarson and Denis Eugene; furthermore, six victims were dead and one was in Federal Prison on the dates listed on the "Power of Attorney", used by Martinez to divert tax deed surplus funds to "Fraudulent Entities". All notaries contacted during the course of the investigation provided affidavits that they did not notarize the "Power of Attorney" and their signatures were forged. Affiant has been unable to obtain sworn testimony from victims Adriel Patino, Yasniela Flores and John Hardy, whose losses amount to \$81,803.36.

Your Affiant subpoenaed and analyzed Mark Eugene, Patricia Eugene, Gawens St Victor, Dim Villarson and Denis Eugene personal and company bank accounts for their companies, Nu Concepts Investments LLC, Concrete Capital LLC, CSC Equity Fund LLC, Unsettled Mgmt Asset Inc., Bridge Connect Solution Investment LLC and Givanna Consulting LLC and was able to locate the deposit of twenty-eight (28) fraudulently issued Broward County checks in the chart below:

Dep Date	Amount	Deposit Bank	Account #	Entity Name	Account Signer
5/21/2015	\$83,306.06	JP Morgan Chase		CSC Equity Fund, LLC	Marc H. Eugene
6/30/2015	\$151,757.98	JP Morgan Chase		CSC Equity Fund, LLC	Marc H. Eugene
7/9/2015	\$24,630.01	JP Morgan Chase		CSC Equity Fund, LLC	Marc H. Eugene
7/31/2015	\$75,092.80	JP Morgan Chase		CSC Equity Fund, LLC	Marc H. Eugene
11/4/2015	\$21,174.48	JP Morgan Chase		CSC Equity Fund, LLC	Marc H. Eugene
5/21/2015	\$48,008.81	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene
5/21/2015	\$61,211.26	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene
7/31/2015	\$33,784.87	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene
6/30/2015	\$20,058.62	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene
11/9/2015	\$111,300.42	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene
2/2/2016	\$5,383.31	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene
2/2/2016	\$24,822.89	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene
2/4/2016	\$7,083.07	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene
8/18/2015	\$27,085.13	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene

8/18/2015	\$39,696.87	JP Morgan Chase		Nu Concepts Investm LLC	Marc H. Eugene
5/11/2015	\$161,686.48	Wells Fargo Bank		Concrete Capital, LLC	Patricia Eugene
8/7/2015	\$34,435.22	Wells Fargo Bank		Concrete Capital, LLC	Patricia Eugene
12/8/2015	\$21,227.85	JP Morgan Chase		Concrete Capital, LLC	Patricia Eugene
3/31/2016	\$179,472.23	JP Morgan Chase		Choice One Investments LLC	Dim Villarson
6/22/2015	\$15,645.56	Wells Fargo Bank		Unsettled Mgmt Asset, Inc.	Patricia Eugene
6/22/2015	\$16,777.29	Wells Fargo Bank		Unsettled Mgmt Asset, Inc.	Patricia Eugene
7/15/2016	\$4,479.36	BB&T Bank		Bridge Connect Sol Invt LLC	Gawens St. Victor
*8/5/2016	\$274,068.39	BB&T Bank		Bridge Connect Sol Invt LLC	Gawens St. Victor
8/11/2014	\$73,876.05	JP Morgan Chase		Gawens St. Victor	Gawens St. Victor
7/1/2014	\$36,687.06	Wells Fargo Bank		Denis E. Eugene	Denis E. Eugene
3/31/2016	\$32,372.93	JP Morgan Chase		Givanna Consulting, LLC	Gawens St. Victor
7/7/2016	\$19,439.84	PNC Bank		Givanna Consulting, LLC	Gawens St. Victor
5/24/2016	\$2,847.92	PNC Bank		Givanna Consulting, LLC	Gawens St. Victor
	\$1,607,412.76				

*On 9/1/2016 Gawens St Victor wired \$96,542.68 to Alliance Equity Advisors LLC. Division of Corporation search revealed that Alliance Equity Advisors LLC is a company registered to Dim Villarson as Registered Agent and Manager.

Scheduling of the "Fraudulent Entities" accounts revealed that Mark Eugene, Patricia Eugene, Gawens St Victor, Dim Villarson and Denis Eugene mostly in cash withdrawals, debit transaction and untraceable ATM transactions spent the ill-gotten funds.

Your Affiant subpoenaed Roberto Martinez' Space Coast Credit Union checking account number [REDACTED] and savings account number [REDACTED]. Scheduling of these account revealed biweekly direct deposits of Martinez' Broward County paycheck; furthermore, during the timeframe of the tax deed surplus fraud, between 1/8/2015 through 7/14/2016, Martinez deposited \$89,100.00 into his accounts in cash teller deposits, as illustrated in the chart below:

Acct #	Date	Cash	Deposit
[REDACTED]	1/8/2015	\$2,000.00	In branch
[REDACTED]	3/31/2015	\$800.00	In branch
[REDACTED]	5/22/2015	\$5,500.00	In branch
[REDACTED]	6/2/2015	\$2,000.00	In branch
[REDACTED]	6/2/2015	\$4,000.00	In branch
[REDACTED]	6/18/2015	\$1,000.00	In branch
[REDACTED]	6/15/2015	\$2,500.00	In branch
[REDACTED]	7/15/2015	\$5,500.00	In branch
[REDACTED]	8/5/2015	\$1,500.00	In branch
[REDACTED]	8/13/2015	\$1,000.00	In branch
[REDACTED]	8/26/2015	\$6,300.00	In branch
[REDACTED]	9/4/2015	\$5,000.00	In branch
[REDACTED]	10/8/2015	\$4,000.00	In branch
[REDACTED]	11/23/2015	\$2,000.00	In branch

	11/23/2015	\$5,000.00	In branch
	12/11/2015	\$1,000.00	In branch
	12/11/2015	\$4,000.00	In branch
	1/5/2016	\$1,000.00	In branch
	1/5/2016	\$4,000.00	In branch
	1/14/2016	\$7,000.00	In branch
	2/11/2016	\$1,000.00	In branch
	2/11/2016	\$3,000.00	In branch
	3/9/2016	\$3,000.00	In branch
	3/21/2016	\$5,000.00	In branch
	3/25/2016	\$3,000.00	In branch
	7/14/2016	\$4,000.00	In branch
	7/14/2016	\$5,000.00	In branch
		<u>\$89,100.00</u>	

Besides the \$89,100.00 in cash deposits, on 7/16/2016, Martinez purchased a 2013 Kia Sorrento with \$6,000.00 cash.

Analysis of Patricia Eugene’s Concrete Capital LLC, account, revealed two wire transfers, dated 2/9/2016 in the amount of \$33,000 and 3/8/2016 in the amount of \$76,745, wired into the Trust Account of Attorney David J. Joffe’s, Sabadell United Bank account number [REDACTED] Subpoena to Sabadell United Bank for account number [REDACTED], revealed an additional 3/7/2016 wire transfer from Patricia Eugene for \$15,000.00, totaling \$124,745.00. Once Affiant determined that the funds wired into Attorney Joffe’s Trust Account were derived from the proceeds of unlawful activity, a search warrant was obtained and the said \$124,745.00 were frozen by court order.

Sworn testimony and supporting documentation obtained. Affiant swears that the information contained in this affidavit is true and correct to the best of his knowledge and belief.

BSO ID

Sworn to and subscribed before me)
 This 5 day of July, A.D. 2017.)
)
) *John Calabro*
) Affiant Detective John Calabro
)
)
 _____ (seal))
 JUDGE, CIRCUIT COURT

A TRUE COPY
 Circuit Court Seal