



AFFIDAVIT IN SUPPORT OF WARRANT

Your Co-Affiant, Detective Ricardo Arias is a Detective with the Miami Beach Police Department. Detective Arias has been with the Miami Beach Police Department for 20 years. During that time, Detective Arias has been a Detective for 16 years. Detective Arias has experience conducting complex criminal investigations involving narcotics trafficking, money laundering, homicide, economic crimes, cyber-crimes, election related crimes and public corruption. Your Affiant is also a computer forensic examiner and routinely conducts computer forensic examinations. Your Affiant is currently a Specially-Designated Investigator with the Miami-Dade State Attorney's Office Multi-Agency Public Corruption Task Force (hereinafter referred to as the "SAPCTF").

~~Your Co-Affiant, Ronald D. Chapman, is a Specially Designated Investigator with the Miami-Dade State Attorney's Office Multi-Agency Public Corruption Task Force. Co-Affiant Chapman has been a member of the SAPCTF for the past fifteen (15) months, since August 2015. Co-Affiant Chapman is currently employed by the Doral Police Department, where he began working in July 2015. Co-Affiant Chapman was detached to SAPCTF immediately following his employment with Doral Police Department. Prior to Co-Affiant Chapman's employment with the Doral Police Department and being assigned to the SAPCTF, he was employed by the Miami Beach Police Department from September 1986 through March 2015. During this period Co-Affiant Chapman worked as an officer in the Patrol Division until being assigned as a detective in 1991 to the Criminal Investigations Division (CID), Strategic Investigations Unit (SIU). Your Co-Affiant Chapman received specialized training in basic and advanced narcotics investigations, money laundering, organized crime and numerous other trainings classes related to vice operations. Co-Affiant Chapman worked in this capacity until December 2004 at which time he was promoted to the rank of Sergeant of Police. In early 2005, Co-Affiant Chapman was assigned to the Miami Beach Police Department Internal Affairs Division. Co-Affiant Chapman received specialized training related to Internal Affairs Investigations and Police Involved Shooting Investigations while in this capacity. Co-Affiant Chapman investigated sensitive and criminal allegations lodged against police and City employees while in this assignment. In April 2008, Co-Affiant Chapman was promoted to the rank of Lieutenant of Police. Co-Affiant Chapman was briefly assigned to the Patrol Division after being promoted. In June 2008, Co-Affiant Chapman was assigned back to the Internal Affairs Unit to work a major investigation which reported exclusively to the Chief of Police. Co-Affiant Chapman remained in Internal Affairs until 2012 at which time he returned to the Patrol Division. While in the Patrol Division Co-Affiant Chapman served as a Shift Commander and as a Special Assistant to the Patrol Division Major. In March 2015, Co-Affiant Chapman retired as a Lieutenant of Police with the Miami Beach Police Department.~~

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This affidavit is based upon information known personally to your Co-Affiants based upon investigation, physical surveillance, review of voter registration evidence, and sworn statements taken from witnesses who have personal knowledge of the facts herein. Because this affidavit is being submitted for the purpose of establishing probable cause, our Co-Affiants have not included every aspect, fact, or detail of this investigation.

Your Co-Affiants are aware that on October 12, 2016 the Miami-Dade State Attorney's Public Corruption Task Force received information from Miami-Dade Elections Department (hereinafter referred to as "Elections Department") concerning the receipt of false or fraudulent Florida voter registration applications. Specifically, the voter registration applications were submitted by employees of the third party voter registration organization "People United for Medical Marijuana" (hereinafter referred to as "People United"). Registration paperwork obtained from the Florida Department of State (hereinafter referred to as "DOS") indicates People United originally registered as a third party voter registration organization on September 21, 2016. In addition, a list of People United employees were submitted to DOS, which included the names and addresses of seventy-one (71) people and included their personal addresses, all throughout the state of Florida.

Your Co-Affiants are aware that on October 14, 2016, members of the SAPCTF reviewed the Florida Voter Registration Applications provided by the Elections Department and identified by the Elections Department as false or fraudulent registration applications. It should be noted that these applications were identified as false or fraudulent by the Elections Department because it appeared the same person had signed each application on behalf of the registrant and or the registrant was deceased. Some of these voter registration applications contained the initials "TC." Your Co-Affiants know that it is common practice for third party voter registration employees to include their initials on all voter registration applications that they submit. After review of the DOS People United documents, Tomika CURGIL was the only People United employee with the initials "TC." Additionally, CURGIL's name and personal address was listed in the People United employee paperwork, previously referred to in this affidavit.

On October 18, 2016, your Co-Affiant Arias and members of the SAPCTF conducted surveillance at the personal residence of CURGIL. CURGIL's residence is located at 1120 NW 66th Street, Miami, Florida. The purpose of the surveillance was to determine whether CURGIL was lawfully registering Florida voters. The surveillance commenced at 0600 hours. At or around 0700 hours a black female, identified as CURGIL, exited the residence. Shortly thereafter, CURGIL left the residence in a 2006 Grey Pontiac sedan. CURGIL is followed by members of the SAPCTF to two separate schools where it appears CURGIL dropped off her children. CURGIL was then followed back to her personal residence. During the morning hours of October 18, 2016, CURGIL was observed seated in her vehicle and on a cellular phone. At or around this time, a blue Chevrolet arrow star van bearing tag number 941VXB was observed by members of the SAPCTF parked in front of CURGIL's residence. The blue van is registered to

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Babe Golden Baker. Further investigation reveals Baker is also registered as an employee of People United.


During the period of time the van is parked in front of CURGIL's residence, CURGIL was observed by members of the SAPCTF handing paperwork to a black female, later identified as Baker, seated in the passenger side of the van. The blue van then left CURGIL's residence, and was thereafter followed by members of the SAPCTF and your Co-Affiant Arias. At no point during the course of conducting surveillance of the blue van, are the van's passengers observed conducting activity related to registering voters. SAPCTF members continued to conduct surveillance at CURGIL's residence until approximately 1500 hours. During the course of conducting surveillance, CURGIL is never observed conducting activity related to registering voters. On the same date, at our around 1700 hours, an unidentified black female in a Blue Toyota Camry bearing tag 334WAZ is observed by SAPCTF members processing a white box with the Elections Department located at 2700 NW 87 Avenue, Miami, Florida. The unidentified black female is later identified as Jennifer Jean. On the following date, October 19, 2016, SAPCTF member John Marinelli recovered voter registration applications submitted to the Elections Department by a People United representative on October 18, 2016. An Elections Department official later identified this People United representative as Jennifer Jean to your Co-Affiant Arias.


Your Co-Affiants reviewed twenty-two (22) voter registration applications containing CURGIL's initials, "TC," submitted to the Elections Department on October 18, 2016. Of the twenty-two (22) applications, seven (7) contained the names and dates of birth of identifiable individuals. The names and dates of birth of the remaining fifteen (15) applicants could not be identified after utilizing investigative tools. The seven (7) applications pertaining to the identified individuals appear to contain the same or similar hand writing. After investigating and confirming the personal contact information belonging to the seven (7) identifiable voter registration applicants, your Co-Affiants were able to make contact with five (5) of these individuals.

Your Co-Affiants, on October 21, 2016, made contact with A D whose personal information and signature was contained in a voter registration application submitted by CURGIL on October 18, 2016. D agreed to provide a sworn statement to your Co-Affiants. D was presented the voter registration application submitted by CURGIL, and indicated he had never seen the application. D also stated that the address and signature contained on the application in question was not his. Additionally, D indicated he was already a registered voter and agreed he would not need to register again.

Your Co-Affiant Chapman, on October 21, 2016, made contact with S F whose personal information and signature was contained in a voter registration application submitted by CURGIL on October 18, 2016. H was contacted and interviewed via telephone because she

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resided in Delray Beach, Florida per her driver's license. H stated she did not fill out a voter registration form recently and that H was already a registered voter and already had her absentee ballot. It should be noted that the application in question did not contain H correct personal address.

On October 24, 2016, your Co-Affiants made contact with L Si whose personal information and signature was contained in a voter registration application submitted by CURGIL on October 18, 2016. S agreed to provide a sworn statement to your Co-Affiants. S indicated she had previously been registered to vote for years prior to October 18, 2016. Si also indicated she did not fill out or sign the application submitted by CURGIL, and S did not give anyone the authorization to fill out or submit the application in question. S also confirmed the application in question did not contain her real signature and did not have S correct address.

On the same date, October 24, 2016, your Co-Affiants made contact with L R whose personal information and signature was contained in a voter registration application submitted by CURGIL on October 18, 2016. R agreed to provide a sworn statement to your Co-Affiants. R indicated she had never seen the voter registration application submitted by CURGIL. R also stated the application in question did not contain her actual signature and personal address. R confirmed she did not give anyone authorization to fill out the application in question, and R was already a registered voter.

On October 26, 2016, Your Co-Affiants made contact with Tomika CURGIL in the front of her personal residence located at 1120 NW 66 Street, Miami, Florida. CURGIL agreed to be interviewed by your Co-Affiants. CURGIL confirmed the "TC" on the voter registration applications belonged to her. CURGIL also confirmed

CURGIL also stated her grandmother, Babe Baker, got her the job.
CURGIL stated

CURGIL stated she did not recall working on October 18, 2016. CURGIL was shown the five (5) voter registration applications in question and admitted to CURGIL denied signing the voter registration applications in question in the signature box designated to be signed by the applicant.

On October 26, 2016, Your Co-Affiants made contact with Herbert Davis at his personal residence located at 2545 NW 162 Street, Miami, Florida. Davis agreed to be interviewed by your Co-Affiants outside of his residence. Davis confirmed he worked registering voters and would also collect already completed voter registration forms from a "William Greene." Davis also denied providing CURGIL personal voter registration information to be used to fill out voter registration applications.

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On October 27, 2016, SAPCTF member Angel Pichardo made contact with C. A, whose personal information and signature was contained in a voter registration application submitted by CURGIL on October 18, 2016. A agreed to be interviewed and provided a statement. A denied knowing CURGIL. A also confirmed the address included in the voter registration application was not his and A stated he did not fill out the application in question or sign it. A also stated he did not register to vote. It should be noted that A is a multi-convicted felon and would be precluded from registering to vote.

In consideration of the foregoing, there is reason to believe that probable cause exists that, on October 18, 2016, Tomika CURGIL committed: five (5) counts of Submitting False Voter Registration Information in violation of Florida Statute 104.011 (enumerated as COUNTS 1-5):

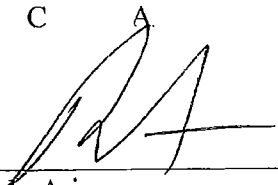
COUNT 1: Tomika CURGIL, on October 18, 2016, did unlawfully and willfully submit any false voter registration information, to wit: the personal information and signature of A E

COUNT 2: Tomika CURGIL, on October 18, 2016, did unlawfully and willfully submit any false voter registration information, to wit: the personal information and signature of S H

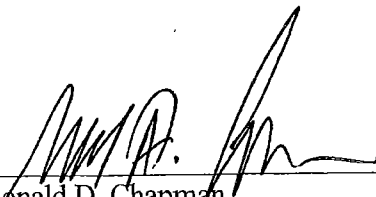
COUNT 3: Tomika CURGIL, on October 18, 2016, did unlawfully and willfully submit any false voter registration information, to wit: the personal information and signature of L S

COUNT 4: Tomika CURGIL, on October 18, 2016, did unlawfully and willfully submit any false voter registration information, to wit: the personal information and signature of L R



COUNT 5: Tomika CURGIL, on October 18, 2016, did unlawfully and willfully submit any false voter registration information, to wit: the personal information and signature of C




Ricardo Arias
Co-Affiant/Detective
Miami Beach Police Department
SA Public Corruption Task Force



Ronald D. Chapman
Co-Affiant/Detective
City of Doral
SA Public Corruption Task Force

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*Sworn to, and subscribed
before me, this 27 day
of October, 2016*

Judge 

*Teresa Pals
11th Judicial Circuit Court Judge*