

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

DAWN PARDO,

Petitioner,

CIVIL DIVISION

CASE NO.: 502006CA014101XXXXMB AA

vs.

JIM JACKSON, NORMA DUNCOMBE
VANESSA LEE, ELIZABETH WADE,
ANN ILES, CARRIE WARD AND
THE CITY OF RIVIERA BEACH,

Respondents.

NOTICE OF FILING ORIGINAL AFFIDAVIT OF RICHELL BREAKWELL

COME NOW, the Defendants, Jim Jackson, Norma Duncombe, Vanessa Lee, Elizabeth Wade, Ann Iles, Carrie Ward and The City of Riviera Beach, by and through their undersigned counsel, and hereby file this Notice that the original Affidavit of Richell Breakwell, was filed with the Clerk of the Circuit Court on January 26, 2007, the original being attached hereto.

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via hand delivery to John M. Jorgensen, Esq., Scott Harris Bryan et. al., 4400 PGA Blvd., Suite 800, Palm Beach Gardens FL, 33410 and Pamala Ryan, Esq., City Attorney, City of Riviera Beach, 600 W Blue Heron Blvd, Ste C-225, Riviera Beach, FL 33404, this 26th day of January, 2007.

BOOSE CASEY CIKLIN LUBITZ
MARTENS MCBANE & O'CONNELL
515 North Flagler Drive, 18th Floor
West Palm Beach, FL 33401
561-832-5900, fax 561-820-0389


RICHARD A. JAROLEM
Florida Bar No. 074950

AFFIDAVIT OF RICHELL BREAKWELL

STATE OF FLORIDA

COUNTY OF PALM BEACH

BEFORE ME, the undersigned authority, personally appeared Richell Breakwell, who, after being first duly sworn under oath, deposes and says:

1 My name is Richell Breakwell.

2 I am employed as an investigator for CTC International. In that capacity, I have personal knowledge of the statements made herein.

3 On or about Sunday, October 15, 2006 I went to the Grator Gator Deli on Singer Island Florida in an attempt to ascertain if the Grator Gator Deli was collecting signatures for three petitions concerning the Ocean Mall projects. Upon arrival I was told that there were three petitions relating to the Ocean Mall redevelopment projects. I was then directed to the petitions with a note attached that said only registered voters of Singer Island/Riviera Beach could sign the petition. It should be noted that the petitions were left essentially unattended. The clerk did not ask if I was a resident of Singer Island/Riviera Beach, nor did the clerk ask for any identification before I signed the petition. Upon signing the petition the clerk stated that I needed to fill in an address. I filled in a fictitious address and once again the clerk did not ask for any identification concerning my residency or the veracity of my signature.

4 On or about Sunday, October 15, 2006 I visited the Sands Hotel on Singer Island, Florida and asked a woman in the office about the petitions and if I could sign them. The woman brought the three petitions out and placed them near the door on a shelf that held entertainment brochures. I was never asked if I was a resident or registered voter of Singer Island. The woman then went outside leaving me with the petitions unattended and unsupervised. The woman never

asked to see any identification or proof of my residency and did not witness my signing of the petitions.

5. On Sunday, October 15, 2006 I visited the Singer Island Health & Fitness center on Singer Island, Florida and inquired about the petitions that were being circulated. I was informed that the petitions were available for signature and was directed to a counter where the petitions were located. The attendant did not ask if I was a registered voter or resident of Singer Island, nor did the attendant ask to see any identification establishing my residency. The attendant also did not ask or require an address for my signature on the petitions. It was also observed that none of the other previous signors had provided any address for their signatures.

FURTHER AFFIANT SAYETH NAUGHT.

I declare under the penalty of perjury that the foregoing is true and correct.

Richell P. Breakwell
Richell Breakwell

STATE OF FLORIDA

COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me this 25 day of JANUARY, 2007, by Richell Breakwell who is personally known to me or who has produced _____ as identification.

My Commission Expires:

Sandra P. Coombs
(Signature of Notary)

(SEAL)



Sandra P. Coombs
My Commission DD202789
Expires April 13, 2007

SANDRA P. COOMBS
(Print Name of Notary)

Aldo R. Rossi, Jr., Director of Operations, began his professional career as a member of the Clandestine Service. Subsequently, he spent over 30 years abroad with the airline industry in Holland, Korea and Mexico, where he became fluent in French and Spanish. He retired and immediately joined CTC International Group.

Lt. Colonel Emin Gadzhiyev was a highly decorated KGB officer. He spent 12 years running intelligence operations in Italy, Afghanistan and throughout Europe. He speaks five languages including Turkish, Russian, and Azerbaijani.

Thomas Poole retired from the CIA after 22 years as a field operations officer, 14 of which were spent abroad. He is a recipient of the Agency's Intelligence Star of Valor, the second highest given by the Agency. He also served in the US Special Forces. He has a degree in mechanical engineering and has worked in the petroleum, technology transfer and nuclear proliferation. He speaks fluent Spanish.

James Coleman joined CTC in 1995 as Director of Security Services. He brought with him 15 years of physical security and VIP protection experience with the CIA.

Steven D. Chubbuck, Director of Investigations, has over eight years of intelligence collection and reconnaissance experience while serving in the military intelligence field. He has been involved in the execution of numerous intelligence exercises and operations around the globe, including counterterrorism, recovery, reconnaissance, and security operations. He was a certified military instructor at the Army School of Armored Reconnaissance Specialists located in Fort Knox, Kentucky, and has an A.A. degree in general studies. He joined CTC in 2006.

Richell S. Breakwell joined CTC as the Office Manager in 2006. She brings with her over 20 years of experience in both government and private industry. She spent 21 years in the CIA as a Support Officer, followed by several years working as a paralegal for law firms. Her first assignment was in Europe, followed by over 11 years in several African posts providing intelligence and intelligence collection support. She has a bachelor's degree in Criminal Justice.

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Select Year: 2006

The 2006 Florida Statutes

[Title IX](#)

[Chapter 104](#)

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ELECTORS AND ELECTIONS ELECTION CODE: VIOLATIONS; PENALTIES

104.185 Petitions; knowingly signing more than once; signing another person's name or a fictitious name.--

(1) A person who knowingly signs a petition or petitions for a candidate, a minor political party, or an issue more than one time commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

(2) A person who signs another person's name or a fictitious name to any petition to secure ballot position for a candidate, a minor political party, or an issue commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

History.--s. 1, ch. 77-178; s. 6, ch. 91-224; s. 23, ch. 97-13.