



Memorandum



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To: The Honorable Daniella Levine Cava, Mayor, Miami-Dade County
The Honorable Chairman Jose “Pepe” Diaz, Chair
and Members, Board of County Commissioners, Miami-Dade County

From: Felix Jimenez, Inspector General

Date: May 2, 2022

Subject: Commission District 2 Former Chief of Staff and Current Community Liaison
Staffer Arrested and Charged with Felony Crimes Stemming from the
Exploitation of their Positions of Trust, Ref. IG17-0040-I

An investigation conducted by the Office of the Inspector General and the Miami-Dade State Attorney’s Office has resulted in the issuance of the attached Arrest Warrant Affidavit for the arrest of Mac-Kinley Lauriston, former Chief of Staff to Miami-Dade County Commissioner Jean Monestime (District 2); Evelt Jeudy, current District 2 Community Liaison; and Nadine Chery, a former Wells Fargo Bank branch manager. As described in the affidavit, former Chief of Staff Lauriston, together with commission staff-member Jeudy and Ms. Chery, engaged in schemes to defraud Miami-Dade County (County) and others while enriching themselves.

The affidavit describes how the trio caused County District 2 discretionary/office grant funds to be fraudulently awarded and then misappropriated using several schemes. The schemes exploited legitimate charitable organizations and used the stolen identities of friends and acquaintances to fraudulently reinstate administratively dissolved entities for personal gain. Using their position as public servants, Lauriston and Jeudy, with the participation of Chery, manipulated County processes to illegally obtain two homes and a vehicle from County surplus property. They also embezzled funds through the fraudulent use of County credit cards known as p-cards. Brazenly, they used the goodwill of the County and the Commission to solicit and obtain donations from members of the community willing to provide to those most in need. The donated funds were diverted to benefit themselves and others. In another contemptible scheme, former Chief of Staff Lauriston paid his tuition to Florida International University with misappropriated funds and then sought, and obtained, reimbursement from the County’s Tuition Reimbursement program.

In all, as the affidavit details, between 2015 and 2021, the trio stole over \$600,000 in County property and funds. All have been charged with Racketeering, a first-degree felony, and numerous other felony counts including Organized Fraud, Theft, and Identity Theft. Lauriston and Jeudy have also been charged criminally with violations of the Ethics Code. Commissioner Monestime cooperated fully with investigators. There is no evidence that he was aware of the illegal activities committed by members of his staff.

Attachment

Cc: Geri Bonzon-Keenan, County Attorney
Gerald Sanchez, First Assistant County Attorney
Jess McCarty, Executive Assistant County Attorney
Edward Marquez, Chief Financial Officer
David Clodfelter, Director, Office of Management and Budget
Cathy Jackson, Director, Audit and Management Services Department
Yinka Majekodunmi, Commission Auditor, Office of the Commission Auditor
Jennifer Moon, Chief, Office of Policy and Budgetary Affairs
Jose Arrojo, Executive Director, Commission on Ethics and Public Trust

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE, FLORIDA

STATE OF FLORIDA)
) ss
COUNTY OF MIAMI-DADE)

STATEMENT OF FACTS IN SUPPORT OF ARREST WARRANT
MAC-KINLEY LAURISTON
NADINE CHERY
EVELT JEUDY

Before me, Richard Hersch, a Judge of the Circuit Court of the Eleventh Judicial Circuit of Florida, personally appeared via digital means, **Special Agent BASSAM FADEL** of the Miami-Dade County Office of the Inspector General (OIG), who being first duly sworn, states that he has probable cause to believe, and does believe, that the former Chief of Staff of Miami-Dade County Commissioner Jean Monestime, **MAC-KINLEY LAURISTON** (hereinafter LAURISTON) former Wells Fargo branch manager **NADINE CHERY** (hereinafter Chery) and current Miami-Dade County (MDC) employee of Commissioner Jean Monestime **EVELT JEUDY** (hereinafter Jeudy) did knowingly engage in a scheme to defraud MDC and others, wherein one or more of the defendants working in concert with another:

- Fraudulently awarded and then misappropriated MDC District 2 discretionary/office grant funds from two charitable organizations, by telling them they were "fiscal agents," then ordering the bulk of the grant funds paid instead to third parties, including their own businesses.
- Fraudulently awarded and then misappropriated MDC District 2 discretionary/office grant funds to administratively dissolved entities that were fraudulently reinstated for purposes of receiving the grant funds.
- Misappropriated grant funds from a MDC Cultural Affairs reimbursement grant, using District 2 receipts/invoices and the same "fiscal agent" scheme.
- Having paid his tuition with misappropriated Cultural Affairs grant funds, Lauriston fraudulently requested and received MDC Tuition Reimbursement funds.
- Illegally obtained MDC Surplus property—2 homes and 1 van.
- Used MDC Purchase cards credit-cards (PCards) to fraudulently obtain MDC funds.
- Solicited MDC vendors to donate to a fraudulent charitable entity controlled by them — using the Commissioner's District 2 letterhead and MDC e-mail — then misappropriated the donations for the benefit of themselves and others.

In doing so, they illegally used various persons' personal identifying information, fraudulently reinstated dissolved corporations of friends, fraudulently opened bank accounts to facilitate the financial transactions and disguise who was benefitting from the funds, caused forged and fraudulent documents to be placed in the public record and be attached to resolutions voted upon by the MDC Board of County Commissioners (BCC). When Lauriston took a leave of absence in 2018 for his failed bid to become the Mayor of the City of North Miami, the scheme continued.

Between 11/6/2015 through 4/27/2021, the defendant's endeavored to obtain \$652,765.33 in money and property through their schemes and through the below detailed pattern of racketeering activity. As of the date of this affidavit, approximately \$640,462.03 in money and property have been traced as illegally benefitting the defendants or those not entitled thereto.

GROSS FUNDS ILLEGALLY OBTAINED BY DEFENDANTS FROM BELOW SOURCES	GROSS AMOUNT DEFENDANTS ENDEAVORED TO OBTAIN	NET AMOUNT OBTAINED BY AND TRACED TO THE DEFENDANTS OR PERSONS NOT ENTITLED THERETO (TO DATE)
Little Haiti Optimist Foundation - 1 Cultural Affairs Grant and 7 District 2 Grants	\$88,846.00	\$89,086.00
Youth Education Through Sports - 7 District 2 Grants	\$37,392.00	\$26,848.70
Haitian Senior Stars Solidarity Group - 4 District 2 Grants, 2 houses, 1 Van, and 1 invoice to MMAP	\$417,425.00	\$415,425.00
Haitian Culinary Alliance USA - 2 grants	\$22,500.00	\$22,500.00
Community Resource Alliance - 1 grant	\$5,000.00	\$5,000.00
Fraudulent Donations	\$35,250.00	\$35,250.00
MDC P-Card charges	\$22,062.18	\$22,062.18
P-Card Kickback	\$4,775.00	\$4,775.00
Tuition Reimbursement - Lauriston	\$4,515.15	\$4,515.15
Grants paid directly to defendant companies: CSN (1 Dist 2 Beautification Grant), CSN (1 Mom and Pop Dist 2 Grant), and 5 Diamonds (1 Mom and Pop Dist 2 Grant)	\$15,000.00	\$15,000.00
TOTAL:	\$652,765.33	\$640,462.03

GROSS FUNDS ILLEGALLY OBTAINED BY DEFENDANTS FROM BELOW SOURCES	GROSS AMOUNT DEFENDANTS' ENDEAVORED TO OBTAIN	NET AMOUNT OBTAINED BY AND TRACED TO THE DEFENDANTS OR PERSONS NOT ENTITLED THERETO (TO DATE)
Little Haiti Optimist Foundation - 1 Cultural Affairs Grant and 7 District 2 Grants	\$88,846.00	\$89,086.00
Youth Education Through Sports - 7 District 2 Grants	\$37,392.00	\$26,848.70
Haitian Senior Stars Solidarity Group - 4 District 2 Grants, 2 houses, 1 Van, and 1 invoice to MMAP	\$417,425.00	\$415,425.00
Haitian Culinary Alliance USA - 2 grants	\$22,500.00	\$22,500.00
Community Resource Alliance - 1 grant	\$5,000.00	\$5,000.00
Fraudulent Donations	\$38,750.00	\$38,750.00
MDC P-Card charges	\$22,062.18	\$22,062.18
P-Card Kickback	\$4,775.00	\$4,775.00
Tuition Reimbursement - Lauriston	\$4,515.15	\$4,515.15
Grants paid directly to defendant companies: CSN (1 Dist 2 Beautification Grant), CSN (1 Mom and Pop Dist 2 Grant), and 5 Diamonds (1 Mom and Pop Dist 2 Grant)	\$15,000.00	\$15,000.00
TOTAL:	\$656,265.33	\$643,962.03

Moreover, based upon these illegal acts, the defendants, being employed by or associated with the victim/entity: **Miami-Dade County**, did unlawfully, knowingly, and feloniously conduct or participate, directly or indirectly, in such enterprise through a pattern of racketeering activity. Therefore, based upon the evidence detailed below, there is probable cause to believe, and your Affiant does believe that they did knowingly commit the following criminal acts:

MAC-KINLEY LAURISTON:

STATUTE	TYPE & DEGREE	COUNTS	CHARGE
895.03	Felony 1 st	1	Racketeering
817.034(4)(A)1	Felony 1 st	1	Organized Fraud over \$100,000
117.105	Felony 3 rd	2	Notary Fraud – as a principal
812.014(2)(b)	Felony 2 nd	2	Grand Theft \$20k - \$100k
838.016(1)	Felony 2 nd	2	Unlawful Compensation/Reward for Official Behavior
838.022	Felony 3 rd	4	Official Misconduct (before 10/1/16)
838.022	Felony 3 rd	16	Official Misconduct
817.535(2)(a)	Felony 3 rd	3	Unlawfully File False Document
817.568(2)(a)	Felony 3 rd	5	Identity Theft – Fraudulent Use
817.568(2)(b)	Felony 2 nd	4	Identity Theft – Fraudulent Use – Pecuniary Value \$5,000 or more
817.568(8)(b)	Felony 2 nd	2	Identity Theft – Dissolved Business Entity – Pecuniary Value \$5,000 or more
812.014(2)(c)	Felony 3 rd	10	Grand Theft - \$750 - \$20,000
2-11.1(G)	Misd 2	1	Exploitation of Official Position
2-11.1(E)3	Misd 2	1	Conflict of Interest – Solicit – Demand Gift
2-11.1(E)4	Misd 2	1	Conflict of Interest – Failure to Disclose Gift

NADINE CHERY

STATUTE	TYPE & DEGREE	COUNTS	CHARGE
895.03	Felony 1 st	1	Racketeering
817.034(4)(A)1	Felony 1 st	1	Organized Fraud over \$100,000
812.014(2)(b)	Felony 2 nd	2	Grand Theft \$20k - \$100k
817.535(2)(a)	Felony 3 rd	3	Unlawfully File False Document
817.568(2)(a)	Felony 3 rd	5	Identity Theft – Fraudulent Use
817.568(2)(b)	Felony 2 nd	4	Identity Theft – Fraudulent Use – Pecuniary Value \$5,000 or more
817.568(8)(b)	Felony 2 nd	2	Identity Theft – Dissolved Business Entity – Pecuniary Value \$5,000 or more
812.014(2)(c)	Felony 3 rd	9	Grand Theft - \$750 - \$20,000

EVELT JEUDY

STATUTE	TYPE & DEGREE	COUNTS	CHARGE
895.03	Felony 1 st	1	Racketeering
817.034(4)(A)1	Felony 1 st	1	Organized Fraud over \$100,000
117.105	Felony 3 rd	2	Notary Fraud – as a principal
812.014(2)(b)	Felony 2 nd	2	Grand Theft \$20k - \$100k
838.016(1)	Felony 2 nd	1	Unlawful Compensation/Reward for Official Behavior
838.022	Felony 3 rd	4	Official Misconduct (before 10/1/16)
838.022	Felony 3 rd	15	Official Misconduct
817.535(2)(a)	Felony 3 rd	3	Unlawfully File False Document
817.568(2)(a)	Felony 3 rd	5	Identity Theft – Fraudulent Use
817.568(2)(b)	Felony 2 nd	4	Identity Theft – Fraudulent Use – Pecuniary Value \$5,000 or more
817.568(8)(b)	Felony 2 nd	2	Identity Theft – Dissolved Business Entity – Pecuniary Value \$5,000 or more
812.014(2)(c)	Felony 3 rd	6	Grand Theft - \$750 - \$20,000
2-11.1(G)	Misd 2	1	Exploitation of Official Position
2-11.1(E)3	Misd 2	1	Conflict of Interest – Solicit – Demand Gift
2-11.1(E)4	Misd 2	1	Conflict of Interest – Failure to Disclose Gift

AFFIANT'S BACKGROUND**Affiant Bassam Fadel**

Your Affiant, Bassam Fadel, hereinafter referred to as "Your Affiant," is currently employed as a Special Agent with the Miami-Dade County (County), Office of the Inspector General (OIG) and has been so employed in that capacity for one year. While the OIG is a criminal justice agency that investigates fraud, waste, and abuse within Miami-Dade County, your Affiant is not employed as a sworn law enforcement officer.

Your Affiant was employed as a sworn law enforcement officer for 25 years. During those years, your Affiant held positions as a police officer, detective, sergeant, and Internal Affairs Commander with the City of Hialeah Police Department, where he investigated fraud, thefts, arsons, robberies homicides and internal affairs cases. Your Affiant has been the lead investigator in numerous investigations involving fraud, theft, and employee misconduct throughout the course of his law enforcement career. In addition to his law enforcement career, your Affiant worked as a financial crime investigator and manager for 14 years for a major US based financial institution, where he investigated and supervised many organized fraud and internal investigations. Your Affiant is a Certified Fraud Examiner through the Association of Certified Fraud Examiners (ACFE.org),

Certified Financial Crimes Investigator, and Certified Cyber Crimes Investigator through the International Association of Financial Crimes Investigators (www.iafci.org).

Your Affiant participated in this investigation and personally interviewed those whose information is set forth herein, and/or has reviewed reports, records or received information from others appearing in this affidavit. As a result of your Affiant's personal participation in this investigation and/or review of reports, oral and written, given to him, your Affiant's review of relevant documents and your Affiant's training and experience, your Affiant is familiar with the circumstances of the offenses described in this affidavit. Within this affidavit your Affiant has not included each and every fact known to him concerning this investigation. Instead, your Affiant has stated only the facts that your Affiant believes establish the necessary foundation and probable cause for the arrest of Mac-Kinley Lauriston, Nadine Chery and Evelt Jeudy.

Miami-Dade County Office of the Inspector General

While the OIG is not a law enforcement agency, the OIG is a Criminal Justice Agency authorized by Section 2-1076 of the County Ordinance to detect, investigate, and prevent fraud, waste, mismanagement, misconduct, and abuse of power through independent oversight of County affairs, and seek appropriate remedies to recover public monies.

INTRODUCTION

Before describing the various schemes used by the defendants to illegally obtain grant funds, it is vital to understand the defendants and the corporate/business relationships between them. Most of the fraudulent transactions were completed in the names of corporate entities and stolen identities. The entities used to mask the defendants' roles in the schemes and shield them from scrutiny were: Corporate Solutions Network (CSN), CSN d/b/a Blue Diamond Party Rentals, 5 Diamonds, Inc., 5 Diamonds d/b/a 5 Diamonds Party Rentals. Each defendant and each company will be explained further below.

DEFENDANTS

MAC-KINLEY LAURISTON

Mac-Kinley Lauriston was originally employed by the MDC on 11/16/2010 as a BCC District 2 coordinator. After resigning in March 2015, Lauriston was rehired on 11/30/2015 as Chief of Staff for District 2 Commissioner Jean Monestime. Lauriston was on a leave of absence, campaigning for his failed bid to become the Mayor of North Miami beginning 9/8/2018. While on a leave of absence, he remained a MDC employee and public servant pursuant to his employment. After the campaign, Lauriston remained a MDC employee and public servant until he resigned his County employment effective 5/1/2020. Your affiant submits that at all times material hereto, Lauriston was a public servant pursuant to 838.014 (7) and his MDC employment until 5/1/2020. Lauriston committed the acts alleged herein during the course of his public employment. These acts constitute

misconduct in office. Lauriston never requested permission for outside employment, nor filed any financial disclosure forms.

According to the State of Florida, Division of Corporations, Lauriston is listed as an officer on at least 10 for profit and not-for-profit entities, both active and inactive. These entities include Fidelis Consulting, LLC, Lauriston & Associates, LLC, Gisele Telefort Lauriston Family Foundation, Inc.

NADINE CHERY

Nadine Chery was a branch manager at Wells Fargo Bank located at 8900 Pines Boulevard, Pembroke Pines, FL., referred to as the "Hollybrook Branch," and has business ties to Lauriston through several corporations and/or financial transactions dating back to 2014. In 2020, Chery and Lauriston opened a joint investment account with TD Ameritrade. According to one witness, Lauriston and Chery shared a personal relationship. According to another witness, Chery was described as Lauriston's partner and "right hand." According to Wells Fargo internal investigations, Chery had access to customer accounts in her position as branch manager, approved all types of transactions, and approved opening checking accounts without the account holders present. Several of the bank accounts at issue in this investigation and used to transfer funds were opened at her branch. Chery continued to have access to customer accounts after her transfer/promotion out of the Hollybrook branch.

According to the State of Florida Division of Corporations, Chery is listed as an officer on at least twelve corporate entities. Those relevant to this affidavit are: Corporate Solutions Network, 5 Diamonds, Inc., Community Resource Alliance, Inc. (a fraudulently reinstated corporation), Genesis Group Home, LLC and Supreme International Services, LLC (a fraudulently reinstated corporation).

EVELT JEUDY

Evelt Jeudy is a current MDC employee, assigned to Commissioner Monestime's District office as a District 2 Commission Coordinator. Jeudy was first employed by MDC on 7/30/2012. Jeudy has filed for outside employment, citing his personal business Le Quotidien Immigration Services, Inc. Jeudy has reported little to no revenue on his annual MDC financial disclosures, in comparison to the funds paid to him as detailed in this affidavit. In addition to being a public servant by virtue of his MDC employment, Mr. Jeudy is also a public servant due to his notary public commission. Acts detailed herein constitute misconduct in office.

According to the State of Florida Division of Corporations, Jeudy is listed as a corporate officer on at least 12 entities, both active and inactive. These entities include League of Haitian American Voters, Inc. and Supreme Int'l Janitorial and Moving Services, Inc. wherein he was a corporate officer with his "best friend" Jean Faveur. Jeudy is

Emmanuella Alcius son's godfather. According to the testimony of Faveur, Alcius, and Alcius's daughter Sheldine Jean Baptiste, their identities were stolen and used to fraudulently reinstate previously dissolved for profit and not-for-profit Florida corporations, which then illegally obtained MDC grant funds and other property.

CORPORATIONS ASSOCIATED WITH THE DEFENDANTS

CORPORATE SOLUTIONS NETWORK (CSN) and CSN d/b/a Blue Diamond Party Rental

CSN was established with the State of Florida, Division of Corporations in 2016 as a for profit corporation. Johane Cothiere, 1385 NW 111 St Miami, FL 33167 was the sole listed officer. On 11/15/2017, Jean Cothiere (Cothiere's brother) was added as Vice President, without his knowledge or consent. He was also listed as Vice President on the 4/30/2018 and 4/30/2019 Annual Reports without his knowledge or consent. Jean Cothiere first learned of this in April 2022. On June 03, 2020, Nadine Chery was added as president, while Johane Cothiere remained listed as registered agent. According to Johane and Jean Cothiere's sworn testimony, both state she/he had nothing to do with this company. It is owned and operated by Nadine Chery, their cousin. CSN has been described by other witnesses or in documents reviewed as either a "business consulting company" or a "party supply company." According to Jean Cothiere, he worked for Blue Diamond Party Rental delivering tables, chairs, and linens to various events, to include an event at Miami-Dade College. For large events Jonathan, Nadine Chery's son helped him, for even larger events, Nadine Chery and Mac-Kinley Lauriston helped him move the tables, chairs, and linens. According to Jean Cothiere, he felt that both Chery and Lauriston owned the company because he received orders and was paid by both Chery and Lauriston.

CSN Wells Fargo Business Checking Accounts: CSN0491 and CSN8816

CSN maintains two business accounts at Wells Fargo (WF): CSN account 0491 and CSN d/b/a Blue Diamond Party Rental account 8816. According to subpoenaed documents, CSN accounts 0491 and 8816 were opened at the WF Hollybrook Branch, located at 8900 Pines Blvd, Pembroke Pines, FL 33024 when Chery was the WF Hollybrook branch manager. The person listed on both accounts was Johane Cothiere. According to the Wells Fargo personal banker who handled the account opening, Amanda Ibarra, Johane Cothiere was not present to open the accounts. Rather, Chery (Ibarra's boss) provided Ibarra with a copy of Cothiere's identification and CSN corporate documents. Ibarra relied on those documents and her trust in her supervisor to open the accounts. Ibarra's testimony is corroborated by the sworn statement of Johane Cothiere.

Cothiere testified under oath that Chery requested to use her name as a CSN corporate officer and as the WF accountholder for CSN. Cothiere consented to such use and provided Chery with a copy of her identification for use in opening the account. CSN accounts 0491 and 8816 deposits and withdrawals were reviewed with Cothiere during her statement to the Office of the State Attorney. While she allowed her name on the accounts, Cothiere testified that she never consented to her name being used on leases, grant applications, and on the fraudulent financial transactions run through the accounts. Almost all checks drawn on the accounts are signed "J. Cothiere." In her sworn statement, Cothiere denied signing any of the checks drawn on the accounts and denied endorsing

any of the deposits into to the accounts, other than a 2/3/2020 transaction. Further, Johane Cothiere denied applying for and being awarded any MDC grants. Cothiere did identify Chery's signature on many endorsements of checks deposited into the accounts. Johane Cothiere also identified Chery's signature as the bank official approving the negotiation of various checks drawn on the accounts.

CSN Square Merchant Account

Your affiant located and identified a Square Merchant account in the name of CSN. This type of account is assigned to merchants and linked to a square-shaped device which connects to mobile devices and allows the transacting of payment cards. Johane Cothiere is listed as the Square account owner. According to Cothiere, she was not aware of this account and did not open it. As detailed below, this Square account was used to process payments by Lauriston and Jeudy, who used MDC p-cards assigned to Lauriston, Jeudy, and a former MDC District 2 employee, Regina Serrano, to pay CSN. The Serrano transactions were without her knowledge or consent, after turning in the P-Card to Lauriston.

CSN d/b/a BLUE DIAMOND PARTY RENTAL

On November 27, 2016, CSN filed paperwork with the State of Florida and registered the fictitious name Blue Diamond Party Rental as a name used by CSN to conduct business. Your affiant notes that at some point after the account opening, the WF CSN 8816 account holder name was changed from CSN, to CSN d/b/a Blue Diamond Party Rental. Your affiant also identified and subpoenaed a third CSN bank account located at 53 Bank. The sole account holder listed is Nadine Chery.

5 DIAMONDS, INC

5 Diamonds Inc. (5 Diamonds) is a Florida for profit Corporation initially incorporated December 26, 2014, and lists Nadine Chery as president. 900 NE 125 St, #206, North Miami, FL. was listed as the original 5 Diamond's principal place of business, mailing address, registered agent's address, and President Nadine Chery's address. At the time, your affiant notes that Commissioner Monestime's district office was located at the same address 900 NE 125 St, albeit a different suite number. This similar address remained on the corporation until January 23, 2017, when 5 Diamonds was reinstated with the State of Florida after involuntary dissolution. Its principal place of business, mailing address, and registered agent's address was changed to 561 NW 119 Street Miami, FL. 33167, an address associated with Chery.

5 Diamonds maintained two bank accounts at Bank of America (BOA). BOA Acct 5570 is in the name of 5 Diamonds, Inc. and BOA account 4589 is in the name of 5 Diamonds d/b/a Diamond Party Services. Chery is the sole signatory on the accounts.

LE QUOTIDIEN IMMIGRATION SERVICES LLC.

Le Quotidien Immigration Services started as a fictitious name owned by and registered to MDC District 2 Commission Coordinator, Evelt Jeudy and his wife Marie. The application to register the fictitious name was first filed with the State of Florida Division of Corporations on 1/27/2016. Its mailing address is 1140 NE 163 Street, Suite 24 [sic],

North Miami Beach, FL, which is where Jeudy's business is located. On 12/23/2021, Evelt Jeudy filed an application for renewal of fictitious name. The principal place of business was unchanged.

On October 6, 2021, Evelt Jeudy filed original articles of incorporation for Le Quotidien Immigration Services LLC, a Florida for profit corporation. Evelt Jeudy and his wife Marie C. Jeudy are listed as managers. The business address is 1140 NE 163 St Suite 204, North Miami Beach, FL 33162. In a sworn statement provided to your affiant, Jeudy advised that his business focuses on immigration needs, primarily translating immigration and other documents from Creole and French to English and English to Creole and French. Fees range from \$150 for a shorter immigration form to "a little more" for longer forms.

LAURISTON, CHERY AND JEUDY TIES

Your affiant has discovered a number of relationships between Lauriston, Chery and Jeudy, which prove they were in business together and associating with each other since at least 2014. This evidence includes:

GISELE TELEFORT LAURISTON FAMILY FOUNDATION, INC.

In Sept 2, 2014, Lauriston filed articles of incorporation for the Gisele Telefort Lauriston Family Foundation, Inc., (GTL Foundation) a Florida not-for-profit corporation. Its original principal place of business, mailing address, and the registered agent Mac-Kinley Lauriston's address were all listed as 900 NE 125 St, Suite 206, in North Miami. Your affiant notes that with the exception of the suite number (206 vs 200), this address was the same address as MDC Commissioner Jean Monestime's district office. GTL Foundation's officers—also listed at this similar address—were Melonie Burke (a then-MDC District 2 Events Coordinator supervised by Lauriston), Adeline N. Pierre-Louis (owner and operator of Impressional Events, a MDC District 2 vendor), Eustaches Cella, and Nadine Chery.

The GTL Foundation 2015 Annual Report was filed on April 30, 2015. On this 2015 Annual Report, GTL Foundation's similar address of 900 NE 125 St, Suite 206, was changed to 7971 Riviera Blvd, Suite 107, Miramar, FL. 33023. All corporate officers remained the same. No other corporate filings were submitted to the Florida Division of Corporations until 2020.

On June 30, 2020, Lauriston filed to reinstate the GTL Foundation. All addresses on the filing changed to 12864 Biscayne Blvd, Suite 469, North Miami, FL. The only officers remaining on the corporation—other than President Mac-Kinley Lauriston—are Vice President Melonie Burke (a current MDC Mayor's Office employee), and Treasurer Adeline Pierre- Louis (a MDC vendor often used by District 2 and paid by the corporations at issue in this affidavit.)

ASSIGNMENT/ASSUMPTION OF LEASE: GTL AND CSN

On April 18, 2016, Lauriston, on behalf of GTL Foundation entered into a lease agreement with a landlord to lease the premises located at **7971 Riviera Blvd, Suite 107**, Miramar, Florida. On **January 16, 2017**, GTL Foundation, as represented by Lauriston, assigned its rights in the lease to CSN. The signature of the assignee is purportedly Johane Cothiere. During her sworn statement, Cothiere testified that she had no knowledge of the Assignment/Assumption of Lease, she never signed the Assignment/Assumption of Lease on behalf of CSN, and never authorized anyone to sign on her behalf.

CSN d/b/a Blue Diamond Party Rental—LEASE AGREEMENT

On **March 17, 2017**, 6303 Miramar Parkway LLC (landlord) entered a business lease with CSN and Mac-Kinley Lauriston, a married man, and Johane Cothiere, a single woman (Lessees), to lease the premises located at **6320-H Miramar Parkway**, Miramar, FL. According to page 11 of the lease, all notices to the Lessee shall be addressed to: Blue Diamond Party Rental, c/o Mac-Kinley Lauriston at 10437 SW 23rd Court, Miramar, FL, with an email address of *CSincorporated@gmail.com* and a telephone number of 786-244-2129. This number is the known cell phone number used by Lauriston. 10437 SW 23rd Court, Miramar, FL is listed with the Florida Department of Highway Safety and Motor Vehicle (DHSMV) as a previous mailing address of Lauriston.

LAURISTON AND JEUDY NOTARY FRAUD

The CSN lease agreement of 6320-H Miramar Parkway was purportedly signed on **3/20/2017** by Johane Cothiere and Lauriston. Cothiere testified that she has never seen this lease agreement, had no knowledge of it, did not sign it, and never authorized anyone to sign on her behalf. Moreover, she never appeared before any notary public. Your affiant notes that Lauriston's and Cothiere's signatures were purportedly notarized by MDC District 2 employee Evelt Jeudy, notary commission GG29594. His notary commission expired **September 13, 2020**.

Attached to the lease agreement is a "Form of Guaranty." This guarantee is also purportedly signed by Johane Cothiere and Lauriston, and notarized by Evelt Jeudy on March 20, 2017, using the same notary commission stamp. Again, according to sworn testimony of Johane Cothiere, she has never seen the Guaranty, never signed it, and never authorized anyone to sign it on her behalf. Moreover, she never appeared and signed the guarantee before a notary public.

On 12/10/2021, Evelt Jeudy voluntarily appeared at the Office of the Inspector General and gave a sworn audio recorded statement to your affiant. In the statement, Jeudy confessed that he notarized the documents after Lauriston presented them to him at work and asked him to notarize the signatures. At the time, Evelt Jeudy worked at Commissioner Monestime's district office located at 900 NE 125 Street. Jeudy stated that the documents were already signed by all parties. Johane Cothiere was not present. Jeudy claimed not to know Cothiere and stated he would be unable to identify her if she was in front of him.

JOINT BROKERAGE ACCOUNT LOCATED AT TD AMERITRADE

Your affiant located a brokerage account at TD Ameritrade, in the joint names of Mac-Kinley Lauriston and Nadine Chery, with rights of survivorship. This account was opened on approximately 6/17/2020.

WITNESS SWORN TESTIMONY

Your affiant was at the voluntary statement of Amanda Ibarra, former Wells Fargo employee who reported to Chery. After being sworn, Ibarra testified that she knew Lauriston because he would often visit her branch manager Chery at the bank. Ibarra stated that she was never informed that either Chery or Lauriston were affiliated with CSN or CSN d/b/a Blue Diamond Party Rental when she was asked by Chery to open the accounts without the account holder present. Ibarra stated she never met Johane Cothiere. According to Ibarra, it was common knowledge that Lauriston was Chery's boyfriend.

Your affiant was present at the statement of Mario Apollon, owner of Youth Education through Sports. According to Mr. Apollon, "Nadine" was "Mac-Kinley's" right hand. Talking to one is like talking to the other. Based upon his observations of them together and his conversations with them, he assumed they were partners. He has known them for a long time—since at least 2016.

ADDRESS SIMILAR TO MDC DISTRICT 2 OFFICE ADDRESS USED ON CORPORATIONS

In addition to the GTL Foundation's use of an address similar to Commissioner Monestime's district office address on corporate documents, the same similar address was also used in connection with other entities at issue in this affidavit. The similar address was used on the corporate documents of 5 Diamonds, Inc., and Impressional Events. Adeline Pierre-Louis is the owner and operator of Impressional Events. Your affiant notes that Impressional Events was paid by CSN, Little Haiti Optimist Foundation, Haitian Senior Stars Solidarity Group, and the Lauriston campaign. Adeline Pierre Louis claims to have no recollection as to why she used that address on her corporation.

THE FISCAL AGENT SCHEME

One of two general schemes used to fraudulently obtain grant funds from MDC was what your affiant calls the "fiscal agent scheme." The fiscal agent scheme enabled the defendants to obtain **\$15,000** grant funds originating from MDC Cultural Affairs and awarded to Little Haiti Optimist Foundation. The fiscal agent scheme also enabled the defendants to obtain grant funds originating from District 2 Discretionary Reserve and Office funds, which were awarded to both Little Haiti Optimist Foundation (7 grants valued at **\$73,846**) and Youth Education through Sports (7 grants valued at **\$37,392**). The grantees were told that they were receiving the various grants only as a "fiscal agent" for District 2. Once monies were received, the fiscal agent was then told by the defendants

where to send the money. To the extent that any grant monies were left, the grantee was allowed to keep the residual funds to apply toward the actual purpose of the original grants.

Notably, after diverting a portion of the MDC Cultural Affairs grant funds awarded to Little Haiti Optimist Foundation, Lauriston used these funds to pay for his FIU tuition. Lauriston then brazenly applied for reimbursement from the MDC Tuition Reimbursement Program. Lauriston was literally reimbursed the maximum allowed by MDC policy for the tuition he paid for with stolen MDC funds. Lauriston was reimbursed \$4,515.15.

LITTLE HAITI OPTIMIST FOUNDATION:
THEFT OF CULTURAL AFFAIRS GRANT FUNDS

The Little Haiti Optimist Foundation (LHOF) is a non-profit organization established in 2010 by a group of business, community, and civic leaders to fund programs for the youth of Little Haiti, an area in Miami-Dade County. It is affiliated with the Little Haiti Optimist Club (LHOC) and with Optimist International, an association of more than 3,000 Optimist Clubs around the world dedicated to "Bringing Out the Best in Kids." The mission of the Little Haiti Optimist is to make a difference in the lives of youth by providing education, mentorship, athletics, arts, and cultural programming. As per its literature, Little Haiti Optimist Club's goal is to be the premier organization providing programs to prepare the youth of Little Haiti for academic and life excellence.

According to Rene Diaz, former County Cultural Affairs Director, in approximately January 2016, Lauriston, through the District 2 Commissioner's Office events coordinator, Melonie Burke, sought assistance in the preparation of an application to obtain a reimbursement grant for "Little Haiti Optimist Foundation" (LHOF), a local not-for-profit company, operated by Marie Louissaint. A reimbursement grant, such as the one being applied for by LHOF, required the grantee to first spend the funds for the event pursuant to an agreed upon budget, and then only after spending the funds, submit expense receipts and invoices to the County for reimbursement. Rene Diaz assigned Vanessa Ortega, a (former) Cultural Affairs employee, to assist LHOF in its application.

According to Ortega, she did complete the grant application on behalf of LHOF. In some instances, she actually wrote sections of the grant application on LHOF's behalf. The application was submitted online to MDC on 4/4/2016. According to Louissaint, the push to apply for this grant came from the Commissioner's office—not from her. She was told that it was being done and that she would act as a "fiscal agent." She understood a fiscal agent to be a charitable organization that receives grant monies on behalf of the Commissioner's office, and then writes out checks in disbursement, as directed by the Commissioner's office. In this case, she identified Lauriston as the person directing when and to whom the disbursement checks were made.

A \$15,000 grant was awarded to LHOF for expenses related to various events to occur during the 2016 Haitian Heritage Month, an annual celebration held in May. Your affiant has reviewed the Cultural Affairs grant documents and the grant agreement. Nowhere in

the grant agreement was LHOFF or Marie Louissaint named as a fiscal agent. Rather, she was the grantee. You affiant notes that the role of fiscal agent does exist regarding grants. However, because a fiscal agent is appointed to make sure that grant funds are properly handled, a fiscal agent is always a third party. The grantee is never the fiscal agent.

A review of County emails regarding this grant, two LHOFF reimbursement packages submitted to the County, and two MDC checks to LHOFF pursuant to the approved reimbursement packages, revealed that District 2 employees—at Lauriston's direction—made various purchases in support of the event in question. These MDC purchases included payments for the venue, liability insurance, maintenance, food, entertainment, and others. Regarding the first reimbursement package sent from District 2 staff to Cultural Affairs, all the attached receipts and invoices indicated County P-Cards and MDC checks paid for the expenses. None of the invoices indicated that LHOFF paid for any expense. According to the reimbursement package's June 28, 2016, cover letter, the package was submitted by Melonie Burke using "Jean Monestime Chairman of the BCC" letterhead. The letter is addressed to the director of Cultural Affairs, from Marie Louissaint and Melonie Burke, and signed by Melonie Burke.

On December 7, 2016, Elizabeth Owens, then the Director of Legislative Affairs for Commissioner Monestime's Office, sent an email to other County employees involved with this specific grant stating "per my chief of staff Mac-Kinley Lauriston, please immediately process the reimbursement in the amount of \$11,857 to the Little Haiti Optimist Foundation." On **December 20, 2016**, County check number 02939497 for the same amount, \$11,857, was issued to LHOFF and deposited in LHOFF's Chase Bank account ending in 4448 on **December 28, 2016**.

As per Marie Louissaint's sworn statement, she was unaware that her name appeared on the first reimbursement package, and at no time did Lauriston or anyone from Commissioner Monestime's office request Louissaint pay back District 2 for the \$11,847 she received. Rather, Lauriston requested Louissaint, as fiscal agent, execute LHOFF checks to payees and in amounts at his direction and/or provide him with blank, signed checks for his use. She stated that she did so.

On May 11, 2017, MDC check 132580 in the amount of \$3,143 was issued to LHOFF. This check was the second and final Cultural Affairs grant disbursement. Cultural Affairs issued this second check after approval of a second LHOFF reimbursement package. Like the first reimbursement package, most of the expenses were paid by Commissioner Monestime's office with the exception of one LHOFF check. Curiously, all of the invoices and cancelled checks in this reimbursement package were incurred in 2017, well after the 2016 Haitian Heritage Cultural month—the original purpose of the grant. Nevertheless, the county approved the District 2/LHOFF request for payment, which per District 2 staff, was approved by Lauriston and referenced above. Again, no one from the District 2 office ever required LHOFF to repay the funds it received based upon District 2 invoices and expenses. Instead, Louissaint states that as fiscal agent, she was instructed by Lauriston to whom and in what amounts to make LHOFF checks payable. Lauriston also instructed her to give him blank, signed LHOFF checks. See **Table 2** below, for a list of LHOFF checks Lauriston directed to be paid to the various entities, some with direct ties to the defendants.

LAURISTON THEFT OF COUNTY TUITION REIMBURSEMENT FUNDS

MDC administrative order 7-4 addresses County employee tuition reimbursement and was created to encourage employees to improve their effectiveness by obtaining additional training and education. Employees who attend accredited educational institutions can be reimbursed. The criteria for participation include the employee studying approved coursework related to the position held by the employee and earn the grade of a "C" or higher. Employees receiving financial assistance including scholarships, fellowships, grants and/or veteran's benefits, are eligible for a refund of 50% of tuition costs, after any and all fees and financial assistance have first been deducted from the tuition.

On **December 29, 2016**, shortly after the first MDC Cultural Affairs reimbursement check of \$11,847 was deposited into the LHOFF account, two LHOFF checks were issued. LHOFF check #1452 was made payable to CSN in the amount of \$11,000. This check was deposited into WF CSN account ending in 0491. The memo line of this check cites "Bands & Sounds Taste of Haiti."

The second check, LHOFF check #1453, was payable to "cash" for \$500, with the memo line citing "Event staffing" and cashed. According to Marie Louissaint, LHOFF did not pay for any of the event costs and did not engage the services of any person or entity supplying "Bands and Sound." Further, Louissaint has testified that Lauriston asked Louissaint to sign the blank checks that he later negotiated. The remaining \$357 balance of the original \$11,847 grant disbursement was compensation for her role as "fiscal agent."

Your affiant was able to trace the Cultural Affairs grant proceeds transferred from LHOFF to CSN. According to WF CSN account ending 0491 bank records, CSN Check #1028 post-dated 01/18/2018 was cashed for \$9,144 at the Hollybrook Branch where Chery was branch manager. (Though the check was dated 01/18/2018, the actual date of the transaction was **01/18/2017**). According to the WF internal investigation, Chery approved the cashing of this check.

According to Bank of America records for a Chery personal checking account ending in 4459, on **January 18, 2017**, a cash deposit of \$9,144 was made. The records indicate that one day later, a withdrawal posted to the account. This withdrawal was an online payment to Florida International University in the amount of \$9,144.

According to records subpoenaed from the Florida International University student payment portal, at the time of this payment, Mac-Kinley Lauriston was registered as a student. Lauriston's student account was accessed on **January 18, 2017**, by Internet Protocol (IP) address 66.165.177.6, using Lauriston's username and confidential password. According to MDC ITD, that IP address belongs to MDC. This MDC IP address was used to pay Lauriston's outstanding FIU tuition, in the amount of \$9,144, from Chery's personal BOA account.

According to MDC records, on **May 25, 2017**, Lauriston submitted a tuition reimbursement request to MDC for the \$9,144 tuition payment. Of the \$9144, the amount eligible for reimbursement was \$9,030.31 due to the ineligibility of various fees for reimbursement. Lauriston's request contained \$113.69 in fees. On **June 23, 2017**, Lauriston was reimbursed \$4,515.15 (half \$9,030.31) for the \$9,144 tuition payment to Florida International University.

In reviewing the LHOFF checking account, your Affiant noted other questioned MDC checks deposited into the account. These questioned checks were all funded by Commissioner Monestime's office, either through District 2 and/or while Office of the Chair, Community Based Organization Discretionary Reserve funds and/or Office funds (hereinafter discretionary funds). In all, there were 7 discretionary grants awarded to LHOFF from District 2, totaling **\$73,846.00**. This amount is *in addition* to the above-referenced Cultural Affairs grant of **\$15,000**. These District 2 discretionary funds grants to LHOFF will be discussed in further detail below. Lastly, in reviewing the CSN bank accounts, your affiant observed payments to CSN from other entities determined to have received MDC District 2 Discretionary grant funds. Those grants are detailed below as well.

THEFT OF DISTRICT 2 DISCRETIONARY GRANTS

Your Affiant has learned that each of the 13 MDC Commissioners is given an annual allocation of MDC funds for their Office Budgets. It is from this budget that a commissioner pays the expenses of their district offices. Office funds may also be used to fund discretionary grants to persons or community-based organizations, as determined by the commissioner. MDC Commissioners are also given separate allocations called discretionary reserve funds. These funds cannot be used to fund their offices. These funds may only be used to award to Community Based Organizations in their Districts, at the Commissioner's discretion. Should a Commissioner not award all the funds in a particular fiscal year, the funds roll over and are added to the next year's office fund allocation or discretionary funds allocation.

DISCRETIONARY FUNDS—GRANT PROCEDURES

For a Commissioner to award discretionary funds, a MDC application form must be completed by the grantee. The grantee states the purpose of the grant, the requested amount, and includes other identifying information. The grantee certifies that he/she has read the back of the application, is aware of the applicable rules and regulations governing the grant award and agrees to use the grant consistent with its stated purpose. Your Affiant notes that there is no follow-up by anyone in MDC to ensure that a grantee has complied with the terms of the grant—rather, it's an honor system. Once a district office determines to whom it wants to award a grant, details of the proposed grant award are incorporated into a MDC Resolution, to be presented to and approved by the full MDC BCC. This is generally done by the Mayor's Office in collaboration with the County

Attorney's Office, based upon information received from the individual Commissioner's Office who is proposing the grant. Once the BCC passes the final resolution approving the grant allocation, MDC Finance Department is authorized to issue a MDC check payable to the grantee, in the amount of the awarded grant. MDC finance deducts the grant amount from the Commissioner's balance.

According to sworn statements of District 2 staff, District 2 follows the above procedures in awarding its discretionary grants.

DISCRETIONARY GRANTS AND COMM. MONESTIME'S SWORN STATEMENT

Your affiant was present at the voluntary sworn statement of Commissioner Jean Monestime at the Office of the State Attorney. Commissioner Monestime testified that at all times material hereto, all decisions regarding discretionary grant funds were the sole discretion of his chief of staff, Lauriston. This included the selection of grantees and the amount of award. The Commissioner testified that he was unaware of any affiliation between Lauriston and any grantee. Had he known that Lauriston and/or Jeudy were personally benefitting from the District 2 grants that Lauriston was approving for award, the Commissioner stated that he would not have allowed that to happen. Commissioner Monestime stated that Lauriston was the only person at his District Office with this authority. Further, as Chief of Staff, Lauriston instructed the District 2 staff to ensure the appropriate paperwork is completed and County procedures followed to facilitate the resolutions presented to the BCC. According to District 2 staff, no potential grant award, proposed legislation or resolutions made it out of Commissioner Monestime's Office and onto the BCC's agenda, without Lauriston's approval.

Your affiant notes that regarding the District 2 discretionary grants selected by Lauriston for award and detailed below, all of the grants were awarded to entities in which he and/or Jeudy and/or Chery had control. This control, in the case of LHOE and Youth Education Through Sports (YES), was gained by telling the grantees they were only receiving the funds as a "fiscal agent." The grantee was then instructed by one of the trio to whom to forward a portion of the grant funds via check. In other cases, the defendants stole identities of friends and acquaintances to reinstate previously dissolved and inactive corporations. Grants were then awarded to these fraudulently reinstated entities. Bank accounts were then opened to fraudulently receive grant funds by Chery. The grant funds were then spent mostly to the benefit of the defendants or others not entitled thereto.

LITTLE HAITI OPTIMIST FOUNDATION:
THEFT OF DISTRICT 2 DISCRETIONARY GRANT FUNDS

The Defendants used the fiscal agent scheme to award seven (7) District 2 discretionary grants to LHOFF, and then misappropriated the grant funds to themselves and others not entitled thereto. In addition to the \$15,000 cultural affairs grant, Lauriston told Marie Louissaint she was also the fiscal agent regarding seven (7) District 2 discretionary grants. In fact, as detailed below, witness Stephane Durand, of Haitian Culinary Alliance Global Inc., stated that it was common knowledge that Louissaint was District 2's fiscal agent.

To obtain a discretionary grant, Louissaint testified that she was presented with grant applications to complete, but often left blank the sections entitled "purpose for the grant" and "grant amount requested." Louissaint testified that the blank areas were filled in by unknown District 2 employees. Once the grant checks were issued, they would be deposited into her LHOFF checking account by her. However, there were times the grant checks were deposited without her knowledge. Lauriston would either direct her to write out a check in a particular amount to a particular payee or request blank checks pre-signed by Louissaint. Louissaint testified that she complied with this because she did not have time to deal with the volume of grants and payments. Further, she was allowed to keep any grant funds not spent by Lauriston for her LHOFF program.

According to Louissaint, she believes that some grant funds were used to support various events sponsored by or supported by Commissioner Monestime. In all instances, and as a fiscal agent, LHOFF had nothing to do with obtaining the goods and services paid for with LHOFF checks, as directed by Lauriston. Louissaint did nothing to ensure that goods and services were actually provided at any event. These funds were never used to support her program or the original stated purpose of the grant in official county documents. Further, Louissaint was unaware that Lauriston was personally benefitting from the checks he ordered her to write. She thought all the checks were used to support District 2 events.

In all, **\$73,846** was paid to LHOFF pursuant to seven (7) separate District 2 discretionary and office funds grants. The application for the first District 2 LHOFF discretionary grant is dated **April 5, 2016**, the day after the cultural affairs grant application was submitted. The last LHOFF District 2 grant application was submitted **9/7/2018**, the day before Lauriston's leave of absence. The last LHOFF District 2 grant check was deposited **9/27/2018**. The seven MDC grant checks are dated between 4/20/2016 and 9/20/2018. **Table 1** below lists the grants awarded to LHOFF, pursuant to Chief of Staff Lauriston's official duties. The chart includes the MDC grant check numbers, the check dates, the grants' funding sources, the grants' purposes, and the grants' amounts:

TABLE 1: District 2 Discretionary Grant Funds Awarded to LHOF

CK NO.	CK DATE	GRANTEE	SOURCE OF FUNDS (*abbreviations below as typed on county documents)	GRANT AMOUNT	PURPOSE PER BCC RESOLUTION
131284	04/20/16	LHOF	Dist2 Office Funds	5,000.00	After School program
2916334	07/19/16	LHOF	Dist2 Miami Open Tennis Fund	7,846.00	Summer Program for Kids
2937186	12/06/16	LHOF	FY17 Dist 2 Office Funds	11,000.00	Tech Center and STEM program at Soar Park
2976651	04/25/17	LHOF	Dist2 Resv Funds FY17	20,000.00	Stem After School Program CBO
2985886	06/27/17	LHOF	Dist2 In Kind FY17	10,000.00	Taste of Haiti Festival
3003788	11/07/17	LHOF	Dist2 Resv Funds FY17	5,000.00	After School Program
3049617	09/20/18	LHOF	Dist2 Off Funds FY18	15,000.00	After School Program at SOAR Park
			TOTAL AWARDED:	73,846	

In all, between the **\$15,000** cultural affairs grant and the seven discretionary funds grants, LHOF received **\$88,846.00** in grant funds between 4/4/2016 and 9/27/2018. Your affiant has analyzed the checks drawn on LHOF and identified by Louissaint as either being directed by Lauriston or a blank check, signed by Louissaint and given to Lauriston. Louissaint testified that the LHOF did not received goods or services in exchange for these checks. Instead, these checks benefitted the defendant or others not entitled thereto. In all, 44 checks were paid to other persons as directed by Lauriston. These 44 checks total **\$89,086**. Approximately **\$40,236** was paid to entities your affiant has determined are affiliated with the defendants Lauriston, Chery, and Jeudy. **Table 2** below lists the LHOF checks paid to questioned and/or fraudulent payees. The items in bold are the checks affiliated with defendants Lauriston, Chery, or Jeudy:

TABLE 2: LHOF Checks Paid at Lauriston's Direction

Bk Post Date	Ck #	Ck Date	Check Payable to	SOURCE OF FUNDS	Amount	Front of Check
05/20/16	1398	04/22/16	Louisa Ponthieux	LHOF	\$4,000.00	Haitian Heritage Cultural Month Opening Rec Catering
07/28/16	1417	07/26/16	PI Beauty Express	LHOF	\$1,200.00	Mother's Day Makeover
07/28/16	1418	07/26/16	Corporate Solutions	LHOF	\$750.00	Community Festival
08/01/16	1416	07/26/16	Eden SDA Church	LHOF	\$1,000.00	Banquet-Disable People
11/21/16	1443	11/16/16	Impressional Events	LHOF	\$3,500.00	Turkey Giveaway 2016
12/12/16	1447	12/09/16	Impressional Events	LHOF	\$2,500.00	Toy Giveaway 2016
12/12/16	1448	12/09/16	Blue Diamond Party Rental CSN DBA	LHOF	\$3,000.00	Toy Giveaway 2016

12/20/16	1454	12/16/16	CSN	LHOF	\$986.00	Toy giveaway
12/29/16	1452	12/29/16	Corporate Solutions Network	LHOF	\$11,000.00	Bands & Sounds Taste of Haiti
12/29/16	1453	12/29/16	CASH (Nadine Chery)	LHOF	\$500.00	event staffing
03/16/17	1455	03/15/17	Blue Diamond Party Rentals (CSN)	LHOF	\$1,000.00	Nadine Chery authorizes as bank official
05/01/17	1475	05/01/17	Haitian Culinary Alliance	LHOF	\$2,500.00	Haitian Heritage Reception
05/08/17	1479	05/06/17	Guy Lemonier	LHOF	\$600.00	sound - opening reception
05/08/17	1478	05/07/17	Imaginart	LHOF	\$250.00	Taste of Haiti - email blast
05/08/17	1480	05/08/17	Haitian Culinary Alliance	LHOF	\$1,500.00	catering
05/10/17	1477	05/06/17	Diane Andrieux	LHOF	\$250.00	performance
05/10/17	1481	05/09/17	Le Quotidien	LHOF	\$5,000.00	Citizenship Drive
05/12/17	1487	05/10/17	Konnexion Multi Center	LHOF	\$2,000.00	Radio Ads - Taste of Haiti
05/15/17	1490	05/10/17	Passion Ministries	LHOF	\$800.00	Stage Lights
05/15/17	1491	05/13/17	Dariot Pampilus	LHOF	\$1,300.00	Sound
05/15/17	1492	05/14/17	Stephanie Warnell	LHOF	\$1,600.00	Radio- 103 The Beat
05/15/17	1493	05/14/17	Bromfield & Associates	LHOF	\$500.00	Marketing
05/16/17	1484	05/10/17	Group Vision Mariem Inc	LHOF	\$500.00	donation
05/16/17	1485	05/10/17	Prayer & Faith Ministry of Deliverance Inc	LHOF	\$250.00	donation
05/17/17	1488	05/12/17	Logistic Solutions Services, LLC	LHOF	\$1,500.00	Electrician - Taste of Haiti
05/17/17	1494	05/14/17	Konnexion BBP	LHOF	\$1,000.00	VIP tent Catering
05/19/17	1496	05/15/17	Doux Tropic	LHOF	\$500.00	Radio AD
05/24/17	1495	05/15/17	Imaginart	LHOF	\$2,500.00	Final Part for Band
06/05/17	1497	05/15/17	Augusta Laurent	LHOF	\$500.00	Taste of Haiti
6/6/2017	1483	5/10/2017	ODEP	LHOF	\$500.00	donation
06/09/17	1498	05/20/17	Nadine Chery	LHOF	\$500.00	Taste of Haiti - event set up
07/06/17	1500	07/06/17	Impressional Events	LHOF	\$2,500.00	
07/12/17	1501	06/14/17	Compu-Design U.S.A. Inc.	LHOF	\$4,500.00	Taste of Haiti
11/13/17	1535	11/11/17	Dariot Alex Pampilus	LHOF	\$600.00	Sound services
11/17/17	1537	11/16/17	5 Diamonds Inc.	LHOF	\$1,000.00	Thanksgiving Event
11/22/17	1536	11/16/17	Eden SDA Church	LHOF	\$1,500.00	Event for disabled
04/06/18	1562	04/05/18	5 Diamonds Inc	LHOF	\$1,500.00	Haitian Heritage Month 2018
04/11/18	1561	04/06/18	Impressional Events	LHOF	\$1,500.00	Haitian Heritage 2018

05/11/18	1573	05/11/18	5 Diamonds Inc	LHOF	\$500.00	mailings
06/25/18	1583	06/25/18	PIAT	LHOF	\$5,500.00	consulting
10/09/18	1633	10/04/18	Imaginart Media Production	LHOF	\$2,750.00	marketing and consulting service
10/09/18	1634	10/04/18	Impressional Events	LHOF	\$750.00	event set up
10/25/18	1635	10/23/18	5 Diamonds Inc	LHOF	\$10,000.00	for computer labs
4/24/2019	1680	4/12/2019	Impressional Events	LHOF	\$3,000.00	Haitian Heritage Month Opening Reception Catering
TOTALS:					\$89,086.00	

In reviewing the checks drawn on LHOF Chase Bank account, your affiant has identified two different handwritings on the checks. One has been identified by Louissaint as her handwriting, and the other handwriting has been identified on signed, blank checks given to Lauriston. Louissaint testified that Lauriston was the only MDC official who directed her in this scheme and to whom she gave the checks, signed by her, in blank or completed.

YOUTH EDUCATION THROUGH SPORTS (YES): THEFT OF DISTRICT 2 DISCRETIONARY GRANT FUNDS

The defendants used the fiscal agent scheme to award seven (7) District 2 Discretionary grants to Youth Education Through Sports (YES) and then directed the grant funds to themselves or others not entitled thereto. YES is a not-for-profit organization established in 2008 by Mario Apollon to help children in underserved areas succeed by promoting sports, particularly soccer. YES operates out of a City of North Miami park and is funded by grants, donations, and what little fees they can collect.

Your affiant was present at the sworn statement of Mario Apollon. After being served with a subpoena, Mr. Apollon called to inquire. Your affiant told Apollon the investigation was regarding grants he received from Commissioner Monestime's Office. On the day of his statement, Mr. Apollon appeared with a portion of his bank records he was able to access. Mr. Apollon testified that he knew Lauriston and Jeudy from the Commissioner's Office on NE 125 Street in North Miami. Mr. Apollon explained that through the years, he has used grants from the City of North Miami, the Children's Trust, and MDC to fund his program. Mr. Apollon testified that he knew "Nadine" for a long time. He stated that at one time she worked at Commerce Bank. She helped him with his banking, and he referred her customers. According to Apollon, "Nadine" and "Mac-Kinley" have worked together for years. She doesn't work for the Commissioner but works with Mac-Kinley. He stated that he considered them "a pair". She was his "right hand".

At some point, Apollon was approached by Nadine, who stated that 5 Diamonds needed a charitable organization to act as a "fiscal agent." He wasn't quite sure what that meant, but quickly learned that after receiving MDC District 2 grants, either Chery, Lauriston, or

Jeudy instructed him to write checks from the grant funds to third parties, most of whom he was unfamiliar. Apollon was allowed to keep the remainder of the grant funds that were not disbursed for use in his program—the original purpose of the grant. Lauriston awarded him thousands of grant dollars. However, the defendants sometimes left Apollon with only a few hundred dollars to run his program.

Apollon stated that he would fill out the grant application, and the Commissioner's Office would place the grant amount on the form. After approval, the check was usually delivered to him by Lauriston, Chery, or Jeudy at his place of business in North Miami.

Table 3 lists District 2 grants awarded to YES. The first YES District 2 grant application is dated **3/31/2016**. The last grant check is dated 12/11/2018. The last disbursement check ordered written is dated **12/15/2018**. It lists the MDC grant check dates, the MDC grant check numbers, the grant funding sources, the grants' stated purposes, and the grant amounts. In all, YES was awarded **\$37,392** in District 2 grants.

Table 3: District 2 Discretionary Grants Awarded to YES

DATE OF GRANT CHECK	DIST 2 GRANT CHECK NUMBER	SOURCE OF GRANT FUNDS (*abbreviations below as typed on county documents)	PURPOSE	AMOUNT
04/28/16	131329	FY2015-16 Dist2 Off Fund	Summer camp 2016 expenses	\$6,892.00
11/01/16	2933014	FY2015-16 Dist 2 Off Fund	Sept 2016 to June 2017	\$5,000.00
05/02/17	2977541	Dist 2 Resv funds FY 17	June 2017 to August 11, 2017	\$5,000.00
12/05/17	3007202	Dist 2 Resv funds FY18	Afterschool operation	\$7,500.00
03/06/18	3019776	Dist 2 Resv funds FY18	Afterschool operation	\$2,000.00
06/05/18	3033391	Dist 2 Resv funds FY18	2018 Summer Camp Program	\$7,500.00
12/11/18	3061406	dist 2 resv funds fy 19	n/a	\$3,500.00
Total Grants Awarded:				\$37,392.00

Your affiant obtained the bank account for YES located at Bank of America pursuant to subpoena. The records matched the partial records brought by Apollon at his first statement. Your affiant printed all checks drawn on the account during 2016 through 2018. Your affiant met with Apollon at his place of business. He reviewed all checks and identified the checks he was ordered to write. **Table 4** depicts the YES checks identified by Apollon as checks he was ordered to write by Lauriston, Chery or Jeudy after the deposit of the MDC District 2 grant checks.

Table 4: DIVERTED YES GRANT FUNDS

CHECK DATE	YES CHECK NO.	APOLLON STATEMENT REGARDING CHECKS ORDERED TO WRITE TO OTHERS	PAYEE	PURPOSE	AMOUNT
05/03/16	1001	Instructed by Chery	Nadine Chery	professional and consulting	-\$3,000.00
05/03/16	1002	Instructed by "them"	Haitian Mission Par La Foi	recruitment & management of youth program	-\$3,000.00
11/07/16	1021	Instructed by Chery or Lauriston	CSN	NONE GIVEN	-\$4,500.00
05/05/17	1036	Chery told to write check	CASH (Nadine Chery endorses)	Professional Services	-\$1,000.00
11/20/17	1072	Told to give check by Jeudy	New Generation Gospel Ent	media and print services	-\$300.00
12/11/17	1081	Confused handwriting. Don't know payee. Unsure which instructed to give	Konnexion	T-Shirts	-\$298.70
12/11/17	1082	Instructed by Nadine or MacKinley	CSN	Grant Writing	-\$2,500.00
12/12/17	1083	Instructed by Nadine or MacKinley	5 Diamonds	HOLIDAY EVENT	-\$2,000.00
03/16/18	1094	Instructed by Jeudy	SUNRISE ELDER CARE	Operational Loan	-\$1,550.00
06/11/18	1097	Instructed by Jeudy	Harold Emmanuel	Summer Pgm Ad	-\$2,000.00
06/11/18	1098	Instructed by one of them	Michel Arisma	Summer Pgm Ad	-\$2,000.00
06/11/18	1099	Instructed by Jeudy, if not mistaken	Bromfield & Associates	Marketing and Printing	-\$1,000.00
06/11/18	1100	Instructed by Jeudy	Elie Jean	Professional Services	-\$500.00
12/15/18	1120	Instructed by Jeudy	Matias Honore	Professional Services & Loan	-\$3,200.00
				Total Grant Funds Diverted by Defendants:	\$ -26,848.70

Your affiant notes that of the **\$37,392** District 2 discretionary grant funds awarded to YES, the defendants fraudulently diverted **\$26,848.70** from YES/Mario Apollon for their use or for the use of others not entitled to the grant funds. YES was only allowed to keep **\$10,543.30**.

In some instances, noted above, Apollon was unable to state whether the grant disbursement check was ordered written by Lauriston or Chery. To him, they were the same. Your affiant notes that regarding the checks wherein he was unsure, most were written to Lauriston/Chery business entities and/or traced to accounts controlled by them. Apollon stated that the information on the memo line of the check, purportedly explaining

the purpose of the check, was written at either Lauriston, Chery, or Jeudy's direction. He stated that they would sometimes write out on a piece of paper disbursement check details. Of all the grants YES has received, it was only the District 2 grants wherein MDC officials Lauriston and Jeudy ordered him to pay funds to someone else. He stated that he agreed, because he needed grant funds to run his program and he was afraid if he refused, he would no longer receive any funds. Your affiant notes that YES's other major funding source was the City of North Miami. It should be noted that given Lauriston's ambitions to City of North Miami public office, refusal would have also potentially jeopardized future grants from the City of North Miami should Lauriston have prevailed in any North Miami election.

According to Commissioner Monestime, the decision to award discretionary grant funds from his office was the sole discretion of Chief of Staff Lauriston. Lauriston requested permission to go on a leave of absence beginning 9/8/2018 to run for Mayor of the City of North Miami. Of the trio, only Jeudy remained an active MDC District 2 employee during that time.

Your affiant asked another OIG Special Agent not familiar with the facts of this investigation to show photo lineups to Mr. Apollon, consistent with State of Florida laws related thereto. Your affiant assisted in compiling three separate photo stacks: one containing Lauriston, one containing Jeudy, and one containing Chery. The lineups were shown to Mr. Apollon by OIG School Board Special Agent Archie Moore. According to documents received and your affiants review of Agent Moore's report, Mr. Apollon identified Lauriston, Jeudy, and Chery.

THE FRAUDULENT CORPORATION SCHEME

The defendants employed a second general scheme to illegally obtain District 2 grant funds and other property. Your affiant calls this second scheme the "fraudulent corporation scheme." In this second general scheme, the defendants cut out the middleman, i.e., the fiscal agent. Instead, they found inactive Florida corporations and filed online corporate documents with the State of Florida Division of Corporations to reinstate them. In doing so, they often used the personal identifying information stolen from friends and acquaintances of Jeudy. Lauriston then approved grants to be awarded to the fraudulent corporations using his authority as a public servant. Chery facilitated the scheme by gaining control of fraudulent bank accounts using her WF banking authority. The fraudulently reinstated corporations used by the defendants to gain District 2 grant funds and MDC District 2 surplus properties (2 houses and a van) were Haitian Senior Stars Solidarity Group, Inc., Haitian Culinary Alliance USA, Inc, and Community Resource Alliance, Inc. Each received grants from District 2 and will be discussed below, separately.

**HAITIAN SENIOR STARS SOLIDARITY GROUP, INC. (HSSSG)—FOUR (4)
DISTRICT 2 GRANTS, TWO (2) SURPLUS HOUSES, ONE (1) SURPLUS VAN
AND ONE (1) FRAUDULENT INVOICE**

HSSSG was one of three inactive corporations fraudulently reinstated by the defendants. A MDC financial database query revealed Lauriston awarded four (4) District 2 discretionary grants to HSSSG. The MDC Metro Miami Action Plan (MMAP) paid one HSSSG fraudulent invoice. Lastly, HSSSG received MDC District 2 surplus property—two houses and a 2006 Dodge van. **Table 5** shows the value of the grants and assets fraudulently obtained by the defendants through HSSSG. The process to award the first grant at issue in this affidavit and awarded to HSSSG began on or about **11/9/2015**, when the resolution was assigned to the County Attorney's Office. The last HSSSG District 2 grant application was dated 1/25/2018. The MDC grant check is dated 2/6/2018. It was deposited in to the HSSSG account on 2/22/2018. The last disbursement payment out of the HSSSG WF account 8717 was on **8/8/2019**. **Table 5** includes the application dates, the sources of the grant funding, the amounts paid, the stated purposes of the grants, and contact information for HSSSG. The value for the surplus property was obtained from the MDC Resolutions approved by the BCC, which authorized the donation of the properties to HSSSG. The MDC Resolution approving the transfer of title to the homes and van contained the fair market values of the property at the time of transfer.

Table 5: Value of MDC Funds and Assets Awarded to HSSSG

Appli- cation Date	Source	Grant Amt	Purpose	Contact person	Contact Address	Contact Email	Contact Phone
11/23/15	Dist 2 CBO Discretionary reserve	\$2,500.00	Annual Seniors food Package Giveaway	Jean Antoine Faveur	850 NW 199 St Miami, FL 33169	jeanfaveur@yahoo .com	305-439- 6064
09/27/16	Dist 2 CBO Discretionary reserve	\$2,500	Youth educational Field Trip	Jean Antoine Faveur	850 NW 199 St Miami, FL 33169	jeanfaveur@yahoo .com	305-439- 6064
10/27/16	PHT SURPLUS PROPERTY	\$165,357	FOR USE IN PROGRAM	Jean Antoine Faveur	850 NW 199 St Miami, FL 33169	jeanfaveur@yah oo.com	305-439- 6064 786-355- 7556
10/27/16	PHT SURPLUS PROPERTY	\$220,318	FOR USE IN PROGRAM	Jean Antoine Faveur	850 NW 199 St Miami, FL 33169	jeanfaveur@yah oo.com	305-439- 6064 786-355- 7556
03/07/17	MDC Surplus Property- VAN	\$2,750	FOR USE IN PROGRAM	Jean Antoine Faveur	480 NW 123 St North Miami 33168	-	
4/6/2017 invoice	MMAP Trust	\$1,000	State of Black Miami Forum Sponsorship	HSSSG, Inc	480 NW 123 St North Miami 33168	none listed	305-699- 5220, fax 786- 472-6724
04/10/17	Dist 2 CBO Discretionary reserve	\$20,000	community program	Nadine Chery / Johnnie R Moore	480 NW 123 St North Miami 33168	hsssgroupinc@gm ail.com	954-478- 1299

01/25/18	Dist 2 CBO Discretionary reserve	\$3,000	none given on app	Mita Morisseau	480 NW 123 St North Miami 33168	none listed	none
Total HSSSG Grants Awarded		\$417,425					

In all, the defendants fraudulently obtained **\$417,425** in grant funds and surplus property using HSSSG. As noted further in this affidavit, HSSSG was also used to fraudulently obtain donations.

This investigation has revealed that HSSSG was originally incorporated by Mr. Jean Antoine Faveur to assist aging stars of Haitian descent. Faveur describes Evelt Jeudy as his best friend. Based upon the statement of Faveur, a WF bank account in the name of "*Haitian S.S.S. Group*" was hijacked by Chery and Lauriston to fraudulently received donation checks from MDC businesses and/or vendors. Faveur was pressured by Lauriston to assist him in obtaining these funds. Faveur was uncomfortable with this activity and closed that account. He "walked away from" his business. The entity HSSSG was then fraudulently reinstated with the State of Florida. A second, new bank account was opened in the name of "*Haitian Senior Stars Solidarity Group, Inc.*" at Chery's bank to receive grant and donation funds. Faveur has testified that he never applied for the above grants, and never authorized anyone to apply for them in the name of HSSSG.

Statement of HSSSG President Jean Antoine Faveur

Your affiant has taken sworn statements from Faveur, as more information was learned from subpoenaed documents. Faveur explained to your affiant and OIG Special Agent Lorraine Moore that he was the owner and president of HSSSG, a Florida not-for-profit corporation. Faveur is currently employed by a private company as a "skycap" at Miami International Airport, where he has worked for various employers for thirty-one years.

Faveur who explained that he created HSSSG Inc to help ailing older Haitian musicians and artist by hosting events where the older artists performed and were provided with the proceeds. At one point the venture was no longer viable, attendance kept dropping to a point where he could no longer sustain the events. He closed the Wachovia, now Wells Fargo Bank account and gave away the company. At first, Faveur could not remember who he gave the company (HSSSG) to or when.

Original WF Account 5601 - Hijacked for Fraudulently Obtained Donations

Your affiant located the original bank account of Haitian S.S.S. Group originally opened by Jean Faveur, when he was acting as president of HSSSG, before closing it down. This account is WF ending in 5601 in the name of "Haitian S.S.S. Group, Inc." This account is a "Business Market Rate Savings" account—not a checking account. As such, no checks were issued to the accountholder. To take funds out of the account, one must make a counter withdrawal of cash or purchase a certified check.

Your affiant's review of Faveur's WF account ending in 5601 account reveals that numerous checks from MDC and organizations conducting business with the County or businesses who have responded to District 2 requests for various donations. Some donation checks contained Commissioner Monestime's address under the payee

HSSSG. Other donation checks had notations on the memo line such as Commissioner Monestime's turkey or Thanksgiving event. However, all the funds were deposited starting November 2016. At the time, the account balance was -\$4.70. The balance of this account had started dropping back in February 2016 due to bank service fees. Table 6 below shows the MDC and donation checks deposited into HS.S.S.G. Your affiant notes that these donation checks deposited into the original HS.S.S.G account are markedly similar to the donation checks deposited into the second, fraudulent HSSSG account detailed below in Table 9, starting at page 41 of this affidavit.

Table 6: Checks - WF Haitian S.S.S. Group Savings Account

Date of Donation Check	Date of Deposit or Withdrawal	Check No.	ADDRESS USED FOR HSSSG	Fund Source	Deposit Amount	Memo	Cash Withdrawal Amount
10/14/2016	11/3/2016	93	900 NE 125 St, Suite 200 Miami, FI 33161	Cornerstone Group Partners LLC 2100 Hollywood Blvd, Hollywood, Fl. 33020	\$1,000		
10/14/2016	11/3/2016	132104		Weiss Serota Helfman Cole & Bierman P. L. Attorneys at Law 2525 Ponce de Leon Blvd Suite 700 Coral Gables, FI 33134	\$200	Chairman Monestime 2016 Annual Thanksgiving Event	
10/20/2016	11/3/2016	1620		LEASA Industries Co, Inc	\$1,000	Donation for Thanksgiving Turkey Chairman Monestime	
10/31/2016		12249	900 NE 125 St, Suite 200 Miami, FI 33161	South Florida Stadium, LLC	\$1,000		
11/2/2016	11/3/2016	2717		Gutierrez Properties, LLC 3175 SW 8 St Miami, FI. 33135	\$500		
11/2/2016	11/3/2016	52371	900 NE 125 St, Suite 200 Miami, FI 33161	Universal Trading and Engineering Corp. 2250 NW 93 Ave Doral, FI. 33172	\$1,000		
	11/4/2016			CASH WITHDRAWAL			-\$4,500.00
	11/13/2016			CASH WITHDRAWAL			-\$1,000.00

11/17/2016	11/21/2016	8709	900 NE 125 St, Suite 200 Miami, Fl 33161	Orion Jet Center 15000 NW 44 Ave Miami, Fl. 33054	\$7,200		
	11/22/2016			CASH WITHDRAWAL			-\$7,000.00
11/18/2016	11/28/2016	1599	850 NW 199 St Miami, Fl. 33169	Munilla family Foundation 6201 SW 70 St, 2nd Floor Miami, Fl. 33143	\$2,500		
11/18/2016	11/28/2016	420990 26	900 NE 125 St, Suite 200 Miami, Fl 33161	Seaboard Marine, LTD 8001 NW 79 Ave Medley, Fl. 33166	\$300		
	12/1/2016			CASH WITHDRAWAL			-\$2,800.00
12/9/2016	12/14/2016	132106	850 NW 199 St Miami, Fl. 33169	Miami Dade County	\$2,500	District 2 Grant	
	12/15/2016			CASH WITHDRAWAL			-\$2,800.00
12/14/2016	12/16/2016	24348	900 NE 125 St, Suite 200 Miami, Fl 33161	Borinquen Health Care Center Inc. 3601 Federal Highway Miami, Fl. 33137	\$750		
	12/17/2016			CASH WITHDRAWAL			-\$750.00
11/9/2016	11/16/2016	1868		South Florida Sports Foundation Inc., DBA Miami Dolphins Foundation	\$1,000		
4/11/2017	4/11/2017	E-PMT		Jackson Health Foundation 1501 NW N River Drive 1st Floor Miami, Fl. 33125	\$3,000	Melonie Burke letter / email	
4/7/2017	4/17/2017	132465	480 NW 123 St Miami, Fl. 33168	Miami Dade County	\$1,000	HSSSG Invoice to MMAP	
3/23/2017	4/20/2017	1396	480 NW 123 St Miami, Fl. 33168	Jackson Health Foundation 1501 NW N River Drive 1st Floor Miami, Fl. 33125	\$2,500		
	4/21/2017			CASH WITHDRAWAL			-\$6,500.00
				TOTAL:	\$25,450	TOTAL:	-\$25,350.00
				TOTAL DONATIONS:	\$21,950		

A review of the withdrawals out of the savings account, show all were cash withdrawals. Your affiant met with Mr. Faveur on 4/20/2022 to question him regarding these deposits and withdrawals. Mr. Faveur reviewed the deposit slips and denied having any knowledge of the deposits. He stated the endorsements were not his writing. Your affiant notes that a WF investigator stated that the handwriting on the endorsements is consistent with former employee Nadine Chery. Your affiant showed Faveur the withdrawal slips evidencing the cash withdrawals. Mr. Faveur identified the writing on the withdrawal slips as his and claimed he signed them. Mr. Faveur first stated that he used the money to pay for event expenses. He stated that the events were his events, which have never included Thanksgiving or Turkey events.

Your affiant notes that the deposits totaling \$25,450 were followed by cash withdrawals totaling \$25,350—in large, even dollar amounts. Of that amount \$21,950 were funds originating from donations. Faveur was questioned about the unusual transactions and advised he did not deposit the checks, his handwriting was not on the endorsement. However, he did make the withdrawals. He identified his handwriting and signature on all withdrawal slips. After later analyzing the dates of deposit and withdrawal, your affiant confronted Faveur telephonically with the fact that the money into the account was donation checks—not his money—followed quickly by cash withdrawals. Faveur maintained his original story and your affiant ended the interview. However, on 4/21/2022, Faveur texted your affiant at 4:47 a.m. In the text Faveur asked your affiant to call him. In the call later that morning, Faveur stated he was upset all night and arranged to voluntarily appear at the OIG to further discuss his testimony.

Later that day, your affiant met with Faveur at his request. Faveur stated that he was ready to tell the truth. He had been up all night in stress. He stated that he had been afraid to tell the truth before, because he had unwillingly participated in the withdrawals with Lauriston. Faveur stated that the truth was that Lauriston originally contacted Faveur and asked to meet him at Lauriston's office. Lauriston advised Faveur that he made a deposit into his account by mistake and asked for the money back. Faveur stated Lauriston continued to make deposits into his account. Faveur specifically recalled withdrawing \$7,000 and turning the cash over to Lauriston. Lauriston in turn gave Faveur \$200. This continued until 05/21/2017 when Faveur withdrew the remaining \$71.29 and closed the account. Faveur advised that he never gave Lauriston his bank account number and later learned from Jeudy that Chery was a branch director at Wells Fargo and "could do what she wanted." Faveur was given what he termed "gas money" for his troubles, \$50 to \$100 for each withdrawal.

Faveur asked Lauriston to stop using his company, HSSSG. Lauriston's use of his account continued. As per WF bank records, the mailing address on the account was changed to 480 NW 123 Street. Faveur stated he wanted the deposits and his withdrawals to stop, so he "gave" HSSSG to Lauriston and told Lauriston to remove his name from the corporation. The account address was changed back to Faveur's address and Faveur closed the account.

Faveur was not aware of any letter or application seeking the donation of the two properties or a van, and again stated the signature was signed by someone else. He did

learn of the properties when he received a mailing with various forms, which he stated that he threw away. Faveur was not aware of the Dodge van that was conveyed to HSSSG and maintained that he did not having anything to do with the county grants.

Faveur stated that he has owned his home located at 850 NW 199 St, Miami, FL since 1994. He has never owned any homes under HSSSG. Faveur has never been in the geriatric care business nor in the addiction treatment business. He has never had people suffering from mental health or addiction issues living with him for assistance. He explained that his company only put on concerts to help older Haitian performers.

Faveur was advised that the company HSSSG is an active corporation with the State of Florida Department of State. Faveur was provided with the State of Florida Division of Corporation filings for HSSSG starting in 2011. Each Annual Report was reviewed, each with (mostly) the same officers, same registered agent, and address of 850 NW 199 St, Faveur's address for years 2012, 2013, 2014, 2015 and January 2016.

On **December 10, 2016** an amended Annual Report was filed with the State of Florida, and new treasurer Johnnie Moore and new secretary Mita Morisseau were listed as corporate officers. Additionally, the report lists a new corporate address of 480 NW 123 St Miami, FL., not Faveur's address. Faveur feels the December 2016 filing was when he gave away or walked away from the company, due to Chery' and Lauriston's unauthorized use of his original account. Faveur did not file this December 2016 report with the State of Florida and gave no one permission to include his name on the filing. When shown the December 10, 2016 corporate filing, Faveur did not recognize the new officer names but did know the new registered agent Erigene Belony. Faveur advised that he had an argument with someone regarding radio airtime and Belony was the lawyer for the opposing party. Faveur never discussed HSSSG with Belony and did not give Belony permission to use Belony's name on the company.

All of the remaining HSSSG Annual Reports through 2021 were reviewed with Faveur. Faveur remained on the 2017 Annual Report filed on **2/28/2017**. The 2018 Annual Report was filed on **1/2/2018**. Faveur was no longer listed. Instead, Claudette Andre was listed as the new President. Faveur did not know the names of any of the officers listed: Johnnie Moore, Mita Morisseau, Janey Baker, Claudette Andre, Conrade Prophete, Jenny Botex, and Devoreen Grant.

Florida Division of Corporation Payment Information for HSSSG

Your affiant subpoenaed the State of Florida Division of Corporations, to obtain payment information related to the online annual corporate filings of HSSSG. The State only maintains payment information dating back to 2019. Your affiant received the following as detailed in **Table 7** below:

Table 7: HSSSG Payment Information re: Corporate Filings

DOCUMENT	DATE/TIME OF TRANSACTION	PAYEE NAME	PAYEE PHONE	PAYEE EMAIL	PMT ACCT LAST 4
2019 Annual Report	4/30/2019 7:59:14 am	5 Diamonds 13010 NW 1 Street Pembroke Pines, FL	786-327-1798	hsssgroupinc@gmail.com	MC-4867
2020 Annual Report	5/16/2020 10:03:52 pm	Johane Cothiere 1385 NW 111 St Miami, FL 33167	754-244-2129	hsssgroupinc@gmail.com	VI-1577
2020 Amended Annual Report	6/3/2020 12:05:54 pm	Genesis Group Home, LLC 1385 NW 111 St Miami, FL 33167	786-440-6140	hsssgroupinc@gmail.com	VI-9985
2021 Annual Report	4/27/2021 10:01:56 AM	Nadine Chery 480 NW 123 St Miami, FL 33168	786-327-1798	hsssgroupinc@gmail.com	VI-9985

Your affiant notes that the names of the entity/person paying for these corporate filings are related to the defendants. Genesis Group Home Inc. is owned by Chery. The address used for 5 Diamonds is Chery's former home address. The telephone number listed for 5 Diamonds and Nadine Chery is Chery's mobile phone. The telephone number listed on the 2020 Annual Report is the telephone number used by Lauriston.

Statement of HSSSG Former Treasurer, Johnnie R. Moore

Your affiant located and interviewed Mr. Johnnie R. Moore, who is a logistics professional of 25 years. He is also listed as the sole signatory on the more recent WF HSSSG Wells Fargo Bank Account ending in 8717 opened at WF Hollybrook branch. Moore stated he was approached by a childhood friend, attorney Erigene Belony, and asked if he would be interested in assisting Lauriston with a non-profit. Belony explained to Moore that a person with financial experience who can volunteer time to assist with a worthwhile endeavor was needed. Moore explained that in his younger days, dating back to the 1980s, he played sports with Belony and at times Lauriston joined them. Moore knew Lauriston through Belony but did not directly deal with him. When Belony asked Moore for assistance with the non-profit endeavor, Moore agreed because of his long-term friendship with Belony and from seeing Lauriston around the Opa-Locka area.

Once Moore agreed to assist with the non-profit, he was contacted via telephone by Lauriston who asked him to respond to a Wells Fargo Bank located on Pines Boulevard near Hiatus (Pembroke Pines) to meet Chery. Lauriston stated that Chery had everything ready for him to open the bank account. Moore understood that in order to have his name on the bank account, Moore felt that he would need to be added to the corporation. Moore never checked the State of Florida Division of Corporation website to see whether that was done.



Moore stated that at some point after WF HSSSG Bank Account ending in 8717 was opened, someone made a \$20,000 deposit and he received an automatic online notification. Lauriston then instructed him to write two checks. One to Le Quotidien Immigration Services (Jeudy's personal business) and one to Impressional Events. Moore stated that he trusted Lauriston and wrote out the checks. However, he asked Lauriston to provide the invoices related to the checks, as Moore was the Treasurer and needed to document expenditures. Lauriston never complied and never furnished any invoices. As a result, Moore began to feel uncomfortable with the situation. When Lauriston stopped responding to his communications, he asked to be taken off the HSSSG accounts. Moore also communicated with Chery regarding the situation. After telling Chery to take him off the bank account, he soon lost online access. Chery told him he was taken off.

Your affiant notes, however, that while Moore lost online access, he was never removed as signatory on the account. Your affiant had Moore review additional checks drawn on the account and purportedly signed by Moore. After viewing the checks, Moore became visibly upset. Moore denied all knowledge of the checks, stated he did not sign them, and stated that no one was authorized to sign his name.

Lauriston and Chery Text Messages with Moore

Moore informed your affiant that he still had text messages between him and Lauriston and him and Chery on his phone, corroborating his statements. Moore reviewed and shared his mobile phone text messages with Chery who was using telephone number (786) 327-1798. The messages began April 07, 2017, the day the bank account was opened. Moore also shared text messages from Lauriston, who was using telephone number (754) 244-2129. The Lauriston text message began on April 10, 2017 and centered around Moore wanting to meet with Lauriston to discuss Moore's financial responsibilities as treasurer. Moore explained the meeting never happened.

On April 21, 2017, Moore received a text from WF employee Jhonny Jean, asking when the account will be funded, referring to a lack of an opening deposit. Moore forwarded the text message to Lauriston who replied, "Nadine is going to do it." "I will have her talk to Jhonny." Moore continued with the text messages seeking to meet with Lauriston. Lauriston did not acknowledge the text messages. Rather, Lauriston sent a text message that he spoke with Nadine, "She's going to put in 100 until the donations come through."

On May 11, 2017, 9:09 AM, Moore texted Lauriston that he saw a \$20,000 deposit had been made. "Let me know what if anything I need to do."

On May 11, 2017, 11:42 AM Lauriston replied "Le Quotidien immigration Services Memo: Citizenship workshops 10K. Impressional Events Memo: A Taste of Haiti 4,990." Moore explained to your Affiant that he and Lauriston finally spoke. Because Moore had not received a checkbook related to the HSSSG account, Lauriston directed Moore to the WF branch, to meet with Chery and to sign the above-mentioned checks, which Moore did.

On July 18, 2017, 5:22 PM Moore texted Lauriston, "Hello Sir, do you still need me to be treasurer? And if so, why?"

On July 19, 2017, 8:54 AM Moore texted Lauriston, "Hello Mac Kinley..."

On August 23, 2017, 5:50 PM Moore texted Lauriston, "Ok...no answer. I'll swing by the bank tomorrow and remove my name from the account."

On August 24, 2017, 6:49 AM Moore texted Chery, asking to be removed from the bank account. Chery replied they must close the account all together and claimed the bank account was closed shortly thereafter. Moore explained that while he had been receiving WF emails, he lost account online access the same day. (According to Wells Fargo documents, the HSSSG was not closed. Instead, Moore's contact information was changed.)

On August 28, 2017, 2:58 PM Moore texted Lauriston, "Humph...still not even a call. Did you forget your roots? We all come from the hood. Holler at you boy!" Lauriston never responded.

Moore advised that in addition to never receiving invoices for the two checks he signed, there were no board meetings, no board discussions, nor any other business activities that Moore felt were required of a corporation. Moore felt that a legitimate business would not operate in such a fashion, and he could not be part of it. As of the 2018 HSSSG annual report filed 1/2/2018, the HSSSG treasurer was changed from Moore to Janey Baker.¹ Unbeknownst to him, Moore's name remained on the WF bank account.

On October 31, 2018, 8:26 PM Chery texted Moore with an attached Mayor of North Miami campaign flier containing Lauriston's photograph. Moore advised your affiant that the person in the photograph is Lauriston, the person he was referring to in the interview. Moore attended the campaign event that was held at 12301 SW 26 St Coral Springs, FL 33065, Chery and Lauriston were both present.

State of Florida Division of Corporation filings for HSSSG were reviewed with Moore. Moore did not know any of the other names listed on the corporate filings, except for Erigene Belony. Moore did recognize the Belony Law Group that was listed as the "registered agent." Moore added that he was unaware that his friend was listed as the registered agent.

HSSSG WF Bank Account 8717

WF HSSSG bank account ending in 8717 was fraudulently opened at the Hollybrook Branch when and where Nadine Chery was branch manager. Your affiant notes Faveur was still listed as president and never authorized the opening of this bank account. According to a WF internal investigation document received via subpoena, Chery accessed WF HSSSG 8717 through her WF employee access multiple times. Moore was listed on WF HSSSG 8717 account as the sole person with signatory authority.

¹ Ms. Baker was contacted via telephone and consented to a sworn interview via Teams. She is in the Orlando area. Ms. Baker is Chery's sister, had no knowledge that her name was used, gave no permission for it to be used, and was visibly emotionally upset that her sister did this to her. Despite being so upset to the point of crying, Ms. Baker stated that Chery is her sister and did not want to proceed with any criminal charges.

Your affiant has analyzed this account. As the account's balance was drawn down, a District 2 discretionary fund grant check was deposited into the account as it was approaching insufficient funds status. In some cases, as detailed further below, donation checks were deposited as well, for what appears to be the same purpose. Some of these donation checks were solicited by MDC District 2 employees on behalf of HSSSG, using the Commissioner's letterhead. According to Commissioner Monestime, all decisions on who to solicit and for what purpose were made by Lauriston. When Lauriston texted Moore and stated, "She's going to put in 100 until the donations come through," your affiant believes Lauriston was referring to donations he caused to be solicited from MDC companies and vendors, using his authority as Chief of Staff.

Sworn Statement of Erigene Belony

Erigene Belony (Belony) is listed as the registered agent for HSSSG. He provided a sworn statement to your affiant. Belony advised that he has been a practicing attorney since 2001, but he has no experience in addiction treatment or geriatric care. Belony advised he has known Lauriston since the 9th grade. Their friendship has continued when they met each other's families and continued to be friends. Belony claimed he met the Commissioner (Monestime) through Lauriston because Lauriston stays close to the Haitian community.

When asked of his knowledge of HSSSG, Belony confirmed that he did refer Lauriston to Moore to assist with the new nonprofit Lauriston was creating. Per Belony, Lauriston had asked Belony if he knew someone who is organized, that understands numbers that can help with a nonprofit that he (Lauriston) has been doing forever. Belony referred Johnnie Moore. Belony advised that Lauriston previously met Moore through him.

Perhaps a few months after Belony made the referral, he received a call from Moore who claimed that "I'm not getting a response from anybody," meaning a response from Lauriston. Belony replied he advised Moore if they were unresponsive, Moore should not continue attempting to assist. Sometime later Moore advised Belony he got off the corporation (HSSSG).

Belony was never asked to join to corporation. Further, no one came to him as an attorney to assist in filing HSSSG corporate documents with the State of Florida. Belony learned that he was the registered agent of HSSSG when your affiant contacted him. Belony added that looking back, he should have realized something was up, because he once received a letter from the County. Belony could not recall the date of the letter but was certain it was after 2015 when he moved to his new (work) office, where the letter arrived. The letter had the County colors and got his attention because he formerly worked for the County.

Your affiant reviewed the various corporate filings with Mr. Belony and directed his attention to the 2016 Amended Annual Report filed on **12/10/2016**. On that report, Belony was listed as registered agent with an address of One Flagler Building, 14 NW 1 St. Suite 502 Miami, Fl. 33132. Belony verified this was his current work address but was adamant that he did not file the document and he was not asked—nor did he give anyone permission—to use his name and address on the company. Belony stated he did not know Mita Morisseau, the person listed as secretary. Your affiant notes that Belony

continued to be listed as registered agent—without his permission—on HSSSG Annual Reports of years 2017 filed **2/28/2017**, 2018 filed **1/2/2018**, 2019 filed **4/30/2019**, 2020 filed **5/16/2020**, the amended 2020 Annual Report filed **6/3/2020**, and 2021 filed **4/27/2021**.

Belony advised that he believed CSN was a “party rental place.” Belony explained that CSN, the party rental place, had a lease with someone. They (Lauriston and Chery) had to get off the lease because the place they were renting from never obtained a permit from the city. Lauriston called and asked Belony to handle the matter. Belony was uncertain if he had to file anything on the case and used his mobile phone during the interview to check the Broward County Clerk of the Court website. The address for the lease was 6303 Miramar Parkway. Belony added that there was something filed, but he never showed up to court on the matter. Belony added that Chery was helpful in providing documents, but he did not know who owned the business.

Belony was asked if Lauriston ever tried to start some type of home for the aged or addicted. Belony advised that Lauriston was trying “to do an ALF, somewhere close to I-95.” But he was unfamiliar with the two surplus property addresses.

Belony was advised that Chery’s information appears on the corporate filings, with regards to payments, emails, and contact information. Though Belony knows Chery, he only speaks with her in connection with Lauriston. Belony did not give Chery permission to use his name on HSSSG.

Sworn Statement of Mita Morisseau, Secretary of HSSSG

Mita Morisseau was first listed as MSSSG secretary on the 2017 Annual Report filed **2/28/2017**. Her name appears on the subsequent Annual Reports: 2018 filed **1/2/2018**, 2019 filed **4/30/2019**, 2020 filed **5/16/2020**, the amended 2020 Annual Report filed **6/3/2020**, and 2021 filed **4/27/2021**.

She stated met Lauriston when she visited Commissioner Monestime’s office seeking assistance for a friend. She became friends with Lauriston and agreed to help him with a corporation he was starting in memory of his mother who had cancer. Sometime later, Lauriston contacted Morisseau to meet him at an insurance agency and instructed her to bring her driver’s license to be added to a policy for a van belonging to the organization.

Sometime in 2020, after being asked to provide her driver’s license, Morisseau became suspicious and conducted a Google search to find her name on HSSSG as secretary. She became scared, discussed the matter with her sister and her pastor who warned her to be careful. During her sworn statement, Ms. Morisseau showed screenshots of corporate filings from her iPad. Ms. Morisseau explained that when she discovered her name being used, she took pictures. The pictures are dated **September 23, 2020**.

Morisseau knew of Belony, who she would see at Commissioner Monestime’s Office. She knew of Prophete from Haiti; but she did not know any of the other corporate officers. Morisseau did not give anyone permission to sign her name on the 2019 corporate filing.

Approximately 1½ to 2 years ago, Lauriston allowed Morisseau to store her belongings in a home and told Morisseau that he wanted to open a home or two to help older people. Two months ago, Lauriston contacted Morisseau to move her belongings from a residence he controlled, 11 NW 135 St Miami. An empty yellow corner house. Morisseau described the residence where she had stored her belongings in one of the rooms as abandoned, filthy and "bad." When Morisseau responded to the house, she met with a gentleman who had the keys and advised her they were going to clean and fix the residence. Morisseau was not aware of the 480 NW 123 St residence, stating "he has two houses, I don't even have one." Morisseau was not aware of the grants and did not apply for any of them. No one had permission to apply on her behalf or use her personal identifying information.

Sworn Statement of Claudette Andre, President HSSSG

Your affiant located and took a sworn statement of Claudette Andre on April 19, 2022. Your Affiant interviewed Ms. Claudette Andre, the listed President of HSSSG since the January 02, 2018 Annual Report. She continued to be listed on the corporation Annual Reports as President in 2019, 2020, 2020 Amended, and 2021. Andre explained that she dated Lauriston 25 years ago, but they have kept in touch since their breakup. Four years ago, Lauriston asked Andre if she would help him with two group homes he planned to open. As a nurse, she can volunteer by taking vitals or being available if her assistance was needed. Andre agreed.

Approximately one year ago, she met Lauriston at his home, and he drove her to the two residences he planned to use for the group homes. One home was in good shape, the other was not. Andre never heard back from Lauriston. Andre was not aware of, nor did she authorize her name to be added to the corporation. In fact, Andre first heard about the filing with the State of Florida Department of Corporations when your affiant contacted her on April 19, 2022. Andre has no knowledge of the multiple grants for money, the residences and van. Andre was not aware of any HSSSG bank account or any funds that were deposited or withdrawn. Andre felt that the homes would be open after she retired later this year.

Use of 480 NW 123 St

Regarding the residences at 480 NW 123 St, your Affiant learned from a subpoena served on FPL that Josette Henfield is the person currently paying the electric bill for 480 NW 123 Street Miami, FL. Your affiant spoke with Loarena Henfield, Josette's daughter, who also lives at 480 NW 123 St and speaks English. While Josette sat in the interview, Loarena advised they needed a place to live, and a friend allowed them to live there. They (Josette, Loarena and her son) moved into 480 NW 123 St in October 2021. Loarena Henfield and "Kim" made various conflicting statements as to whether or not they paid rent at all, paid rent to Nadine Chery, or paid rent to a realty company. As of the date of this affidavit, subpoenas are outstanding to verify the rental payments.

Fraudulent Public Records

Your affiant has found proof of Lauriston's actual involvement in the review of Resolutions conveying the surplus properties. On November 06, 2016, Lauriston received an email sent by former legislative director Elizabeth Owens. The email was sent to Lauristonm@hotmail.com and Lauriston's MDC email account. Attached to the email was

a proposed resolution to convey two surplus properties located at 480 NW 123 St Miami and 11 NW 135 St Miami to HSSSG. According to a MDC employee who works in the surplus property unit, at the time of this transaction, due diligence investigations of surplus property grantees were completed by the Commissioner's Office that sponsored the donation. Therefore, any due diligence investigation of HSSSG was performed, or not performed, at Mac-Kinley Lauriston's direction.

On **November 15, 2016**, the BCC approved Resolution R-1104-16, granting authority to convey two houses to HSSSG. R-1104-16 states, "The accompanying resolution was prepared and placed on the agenda at the request of Prime Sponsor Chairman Jean Monestime." Resolution No. R-1104-16 contains an application letter dated October 27, 2016, purportedly authored, and signed, by Mr. Jean Antoine Faveur as president of HSSSG. The letter explains HSSSG's purported mission and requests the two residences for use in its program: 480 NW 123 St and 11 NW 135 St. The author requested the two properties "for the purpose of providing elderly services to the community, and/or a sober house to provide a safe, clean and professional detox environment for those who are looking to overcome their addiction."

This resolution resulted in two County Deeds being recorded at the MDC Recorder's office on **1/27/2017**. The deed conveying 11 NW 135 Street to HSSSG is recorded at CFN2017R0049899 or Bk 30399 pgs 2672-2674 (3 pgs). The deed conveying 480 NW 123 Street to HSSSG is recorded at CFN 2017R0049891 or Book 30399 pgs 2657-2659 (3 pgs).

On **3/7/2017**, Resolution R-202-17 was presented to the MDC BCC. This resolution requested authority to convey a 2006 Dodge van, V.I.N. WD0PD444365947947 to HSSSG. R-202-17 states, "The Accompanying resolution was prepared and placed on the agenda at the request of Prime Sponsor Commissioner Jean Monestime." Resolution R-202-17 contains fraudulent application paperwork purportedly submitted and signed by Faveur on 1/3/2017.

As of the date of this affidavit, both Resolutions are posted on the official MDC website: (www.miamidade.gov) and are on file with the Clerk of the BCC. The surplus funds applications, identified as fraudulent by Faveur, are part of both resolutions on these public sites.

Your affiant interviewed Barry Kent, Miami-Dade County Internal Services Department (ISD) who took part in the deed transfer of the two properties to HSSSG. Kent advised that Lauriston would inquire about the deed transfers. Kent specifically recalled at one point, when the deeds were transferred from the County to HSSSG, Lauriston appeared at the ISD office to view the deed, ensuring the transfers were complete. Kent further advised that at the time of the HSSSG surplus property donations, the District Office supporting the surplus property grant was the office within the county that was supposed to conduct a due diligence review on the surplus grant recipient. Your affiant notes that in this case, that would have been overseen by Lauriston. According to Kent, the new administration changed the procedures related to surplus property, and the due diligence function is now performed by ISD.

HSSSG Van Registration

The County conveyed a 2006 Dodge van deemed "surplus" to HSSSG. Your affiant reviewed County emails wherein Chery communicated with County employees overseeing the transfer and advised that she reviewed the van and will "accept it as is." In subsequent emails, Chery copied Jeudy and identified herself as an "Executive Director" of HSSSG. In said emails, she formally accepted the van. Jeudy forwarded the email to the County Attorney's Office handling the transfer documents.

Jeudy was aware of Chery's relationship with Lauriston. As per Faveur's statement, Jeudy is his "best friend" and sometime in approximately 2016, urged him not to give HSSSG to Chief of Staff Lauriston. Knowing this, Jeudy promulgated the transfer of the van to HSSSG by giving his approval as Commissioner Monestime's representative. As a result, the County Attorney's Office moved the resolution to the Board of County Commissioners for a vote.

Your affiant researched the 2006 Dodge Van conveyed to HSSSG as surplus property. Records checks with the State of Florida, Department of Highway Safety and Motor Vehicles (DHSMV) revealed the van was transferred from the County to HSSSG on **May 11, 2017**. The person conducting the transfer of title transaction was identified via Florida Driver's License number LXXX-2570. According to DHSMV files, that driver's license number is assigned to Lauriston.

Attached to the DHSMV title transfer package is a copy of the State of Florida, Department of State, Division of Corporations 2017 filing for HSSSG. Also attached to the DHSMV transfer package is a County form, "*Internal Services Department Business Services and Property Control, Transfer of Ownership of County Property by Way of Donation*" listing resolution number R-202-17. The donee name: Haitian Senior Stars SG Inc. 480 NW 123 St Miami, Fl. 33168. Nadine Chery is listed as the donation recipient and taking custody of the Dodge Van, along with a signature, dated 03/17/17.

HAITIAN CULINARY ALLIANCE-USA, INC—TWO DIST 2 GRANTS

Haitian Culinary Alliance USA, Incorporated (HCAU) received two (2) District 2 Discretionary grants. Checks for both grants were issued in 2018, in the amounts of \$10,000 and \$12,500, totaling **\$22,500**. The investigation has revealed that HCAU is a fraudulently reinstated corporation. According to the State of Florida, Department of State, Division of Corporations, HCAU is a not-for-profit corporation. Original articles of incorporation were filed on November 07, 2012, listing Stephane Durand as CEO, Davidson Destinoble as vice president and incorporator, and others. The corporation was then dissolved and inactive until 2018. On January 17, 2018, HCAU was reinstated with Jacqueline Exceus as registered agent and treasurer, Jean Elie Joseph as president, and Emmanuella Alcius as vice president, with the address of 925 NW 123 Street, North Miami. The 2019 annual report lists the same officers.

Statement of Stephane Durand

Your affiant located Mr. Stephane Durand, who spoke with your affiant via telephone, and consented to giving a subsequent sworn statement via TEAMS. According to Durand's testimony, he started the company "Haitian Culinary Alliance USA Incorporated." Durand advised that he did not renew the HCAU as they decided to "go global" and incorporated a new entity: "Haitian Culinary Alliance Global, Inc." Durand was not aware of, nor did he authorize anyone to reinstate HCAU and did not know the names of the new officers.

Durand stated he does know Lauriston and has worked with Commissioner Monestime's Office on MDC sponsored events. Durand advised that he heard from another chef hired by Lauriston, that Lauriston was trying to take over A Taste of Haiti. According to Durand, this is an event his organization had rights to and that his organization hosts all over the country. Durand stated he sent a cease-and-desist letter to Lauriston and alerted other chefs of the issue via social media.

Durand reviewed the HCAU 2018 Reinstatement filed with the Division of Corporations on **January 17, 2018**. A 2019 Annual Report was fraudulently filed on **4/30/2019**. Durand stated that he and possibly Destinoble were the only persons who had authority to file any HCAU corporate reports with the State of Florida. Neither of them filed these reports. Further, he has no idea who Jacqueline Exceus or Emmanuella Alcuis is, and they are not affiliated with his organization. Durand stated he was familiar with the name Jean Elie Joseph, but he was never an officer of HCAU. Durand has never done business at any of the addresses listed on the 2018 Reinstatement.

Your affiant notes that HCAU's principal place of business was changed to 6320 Miramar Parkway. That is the address leased by CSN d/b/a Blue Diamond Party Rental pursuant to a lease signed by Lauriston and fraudulently notarized by Jeudy.

HCAU District 2 Discretionary Fund Grant Applications

Your affiant obtained the two HCAU District 2 grant applications. **Table 8** lists details from the two District 2 discretionary grant applications on file with MDC and approved by Lauriston.

Table 8: Information from District 2 Grant Applications

Application Date	Amount Requested	Purpose	Contact person	Contact Email	Contact Telephone	Amount Awarded
04/24/18	\$10,000.00	Haitian heritage month celebration	Emmanuella Alcuis 1919 NE 168 St North Miami Beach 33162	manou2901@yahoo.com	305-303-3729	\$10,000.00
09/20/18	\$12,500.00	culinary program	Emmanuella Alcuis 1919 NE 168 St North Miami Beach 33162	manou2901@yahoo.com	305-303-3729	\$12,500.00

The address listed for Emmanuella Alcuis is false, Alcuis advised she never lived there or used that address. The address was used by Bernadette Demosthene on various corporate filings and according to testimony from Exceus, ran Commissioner Monestime's

social media accounts. Alcius confirmed the email address and telephone numbers belong to her. Alcius gave no one permission to use her name, address, or telephone number on the grant applications. Further, Alcius did not sign the grant application and authorized no one to sign on her behalf. Moreover, Alcius did not receive any of the HCAU grant funds listed above.

Your affiant notes that while the second grant check was issued on 9/20/2018, after Lauriston's leave of absence. However, the process to award and approve this grant occurred before his leave of absence. In all, the defendants obtained \$22,500 in grant funds via HCAU.

HCAU Bank Account

According to WF account ending in 9628 records obtained via subpoena, the District 2 grant checks for \$10,000 and \$12,500 were deposited in a Wells Fargo Bank checking account opened April 23, 2018, at the Wells Fargo Hollybrook Branch where and when Nadine Chery was employed as branch manager. The account name is HCAU, with the address of 925 NW 132 St North Miami, FL 33168. Your affiant notes that this is Emmanuella Alcius address, with the street numbers transposed—132 vs. 123 Street. The key account individual is listed as Emmanuella Alcius of 925 NW 123 St North Miami, FL 33168. As stated below, Alcius denies all knowledge of this account, gave no one permission to use her name, and signed to documents or instruments related thereto.

Sworn Statement of Emmanuella Alcius

Your affiant was present at the voluntary sworn statement provided by Emmanuella Alcius, taken at the Office of the State Attorney. Alcius stated that she never applied for and was not aware of nor benefitted from any District 2 grants to HCAU. Alcius admitted she applied for and received two Mom and Pop grants for her DJ business through District 2. Alcius arrived at the voluntary sworn statement at the Office of the State Attorney with invoices showing that she spent her two Mom and Pop grant funds, which had been awarded to her DJ business, for their intended purposes.

Alcius was unaware of the grants or the use of her name by others on grants or on HCAU corporate filings until your affiant told her about it at her sworn statement on 3/31/2022. Alcius stated that she does not know anything about the entity HCAU. Further, she denied filing any corporate paperwork on 1/17/2018 and 4/30/2019 and does not know how her name came to be on the corporation. Your affiant had not yet received HCAU bank records at the time of Alcius's statement. However, Alcius stated that if a HCAU bank account exists with her name on it, she didn't open it and has never conducted any financial transactions related thereto. Further, she never authorized anyone else to open an account in her name or authorized the use of her personal information.

Alcius advised that she is a close friend of Evelt Jeudy. He is her son's godfather and has assisted her family after her husband's passing. Jeudy has access to her personal information due to their close friendship. Further, other District 2 staff members may have had access to her information due to the District 2 Mom and Pop grants she received related to her DJ business.

2019 Division of Corporation Payment Information

While the payment information related to the 2018 Reinstatement is unavailable, your affiant subpoenaed the payment information for the HCAU 2019 Annual Report. According to the documents, the 2019 Annual Report was filed by "5 Diamonds, 13010 NW 1 Street, Pembroke Pines, FL 786-377-1798." This address and telephone number are related to Chery. The email address used in this filing was *diamondpartyservices@gmail.com*. This 2019 Annual Report was filed on **April 30, 2019**.

Your affiant investigated the subscriber information related to this email address. According to subpoenaed documents, the email address has recovery e-Mail: *csnincorporated@gmail.com* with a recovery phone number of 1-754-244-2129. According to a sworn statement provided by Johnnie Moore and a screen print of Moore's contact information for Mac Kinley Lauriston, 754-244-2129 is Lauriston's mobile number.

Sworn Statement of Jacqueline Exceus

Your affiant was present at the sworn statement of Jacqueline Exceus. Exceus stated that at some point in **January 2020**, she conducted a random internet search on herself as she was applying for a new job. It was through this search that she learned she was a listed officer of HCAU. Exceus stated she never consented to being added to HCAU on the **1/17/2018** Corporate Reinstatement and does not know any of the corporate officers. She did not consent to use of her information on the 2019 Annual Report filed **4/30/2019**. Exceus stated that in January of 2020, she reported the fraud to the State of Florida Division of Corporations and paid to have the entity administratively dissolved. Your affiant notes that her letter reporting the fraud is part of the Articles of Dissolution posted on *sunbiz.org*.

Alcius stated that while she did not recognize any of the other officers of HCAU, she did recognize the corporate address of 1919 NE 168 Street. Exceus explained that a (former) friend of hers, Bernadette Demosthene had an immigration business there. Exceus stated Demosthene runs Commissioner Monestime's social media accounts and is friends with Lauriston. Through her friendship with Demosthene, Exceus met Lauriston.

Exceus shared that some time before her identity was stolen, she was invited by Demosthene to an event held at Lauriston's business in Miramar, FL. Demosthene had explained to Exceus that she and Lauriston worked together, and the event was being held at a business that Lauriston owned. Exceus remembered the name Blue Diamond as the name of the business. She remembers the event because when she arrived, Demosthene was not present. Therefore, she felt uncomfortable. However, she stated that she stayed to await her friend's arrival and helped set up. Exceus described the business as being in a single-story strip mall, located at 6320 Miramar Parkway. The front of the business had party supplies, and the back was a meeting room. Exceus knows Evelt Jeudy through the Santa La organization and through her work with citizen's crime watch.

Your Affiant was able to analyze deposits to the HCAU Wells Fargo account. Aside the two MDC checks totaling \$22,500., the only other check deposited to the account is from the fraudulently reinstated HSSSG for \$1,500.00. Cash deposits were made after ATM

withdrawals. Analysis of the checks paid out of this account show approximately \$10,500. paid to entities associated with the defendants.

Your affiant notes that point of sale (POS) purchases were made with a debit card ending in 2942 linked to this account. One such transaction was at Sam's Club in Miramar, Florida in the amount of \$488.77 on May 28, 2018. Sam's Club records indicate Lauriston's Sam's Club membership card was used to complete the transaction. Lauriston's Sam's Club account is a business account in the name of Diamond Party Services. Your affiant notes that Diamond Party Services is a fictitious name registered to 5 Diamond Inc., with bank accounts located at Bank of America where Nadine Chery is the sole signatory. Lauriston's photograph is part of the Sam's Club account information, along with his driver's license, phone number, and the Commissioner's District 2 Office address.

One of the checks paid out of HCAU Wells Fargo account is payable to Fabiola Jean Baptiste. Your Affiant notes that a Fabiola Jean Baptiste is an officer on corporations wherein Evelt Jeudy is also an officer.

COMMUNITY RESOURCE ALLIANCE, INC.— ONE DISTRICT 2 GRANT

Community Resource Alliance (CRA) is another not-for-profit company that was fraudulently reinstated by the State of Florida Division of Corporations after administrative dissolution for failure to file an annual report. CRA received one District 2 Discretionary funds grant for **\$5,000** on 10/28/2018.

CRA Corporate Information

According to the State of Florida, Division of Corporations, CRA is a not-for-profit corporation originally established January 05, 2016. The original Articles of Incorporation name Nancy Adrien as President and other various persons as officers, who are unrelated to this investigation. The corporation's principal place of business and registered agent address listed was 10007 SW 22 St, Miramar, FL 33025. The 2017 Annual Report lists similar officers and maintained the same principal place of business. No annual report was filed for 2018. Therefore, the State of Florida administratively dissolved the corporation and placed it in inactive status.

CRA was reinstated on **October 18, 2018**. All corporate information pertaining to CRA was changed. The new address of its principal place of business and its new registered agent, Adeline Pierre-Louis, is listed as 11 NW 135 Street. Your affiant notes that this is one of the houses fraudulently obtained by the defendants using HSSSG. Adeline Pierre-Louis, with her real mailing address of 1835 E Hallandale Beach Blvd, Suite 561, Hallandale Beach, FL is listed as CRA president. Sheldine Jean Baptiste of 925 NW 123 Street, North Miami is listed as Secretary/Treasurer. Your affiant notes that Sheldine Jean Baptiste is the daughter of Emmanuella Alcuis. As noted above regarding Haitian Culinary Alliance USA, Evelt Jeudy is a close family friend of Emmanuella Alcuis. On **6/30/2020**, reinstatement paperwork was again filed with the State of Florida. The filing lists Alcuis and Jean Baptiste and adds Chery as VP.

District 2 Discretionary Grant Application

A District 2 discretionary grant application was submitted October 15, 2018, for CRA. The application requests \$5,000 for a "Social Service – Housing Assistance Program." Sheldine Jean Baptiste purportedly signed the application, listing (954) 770-2901, with an email address of *sheldine.jean0018@mymdc.net*.

Lauriston approved the application, as he was still present and actively working as Chief of Staff on and before 8/30/2018, the date the proposed Resolution 847-18 was assigned to an Assistant County attorney for review. The MDC BCC approved the \$5,000 allocation of District to funds to CRA on 9/5/2018. MDC check # 3058293 was issued on November 20, 2019, for \$5,000 payable to CRA, 10007 SW 22 St Miramar, FL 33025. According to a Wells Fargo investigator, the check was approved by former Wells Fargo employee Nadine Chery and cashed. CRA has no account at WF. The initials "NC" and a corporate WF ID number assigned to Chery were noted on the front of the check.

Sworn Statement of Adeline Pierre-Louis

In a sworn statement at the State Attorney's Office on 3/3/2022, Adeline Pierre Louis denied ever being the president and registered agent of CRA. Pierre-Louis knows Nadine Chery. She has done business with the County—specifically District 2—under her corporate name Impressional Events Inc. However, Pierre-Louis testified that she has never heard of CRA and never consented to be a corporate officer on the 2018 and 2020 reinstatements. Pierre-Louis testified that she did not benefit from the funds. She maintains her identity was stolen. Pierre-Louis was not aware of the grant or the fraudulent use of her personal identifying information until notified during her sworn statement.

Sworn Statement of Nancy Adrien

On 4/19/2022, your Affiant located and took a sworn recorded statement of Nancy Adrien, owner and original president of CRA. Adrien stated that she originally incorporated CRA to help people in the community with rent payments and other assistance. In approximately 2018-2019, and after having a second child, she no longer had time to devote to the endeavor. She asked her then accountant to assist her in closing the business and closed her bank account. Adrien never sold CRA or gave anyone permission to reincorporate it. Adrien stated that she had no idea that someone reinstatement her corporation until the date of her interview and after being told by your Affiant on 4/19/2022.

Adrien testified she never authorized any of the persons appearing on the 2018 and 2020 corporate reinstatement documents to use CRA. She never applied for any grant. She never authorized anyone to apply for any grant on her behalf or in the name of CRA. Adrien never received any grant funds and never authorized anyone to cash the check in her company name. She does not know Sheldine Jean Baptiste, Evelt Jeudy or Nadine Chery. Adrien does know of Mac-Kinley Lauriston through her friendship with a City of Miramar commissioner where he worked. Adrien is not friends with Lauriston and has no other relationship with him. Adrien is very upset that her corporation's name has been hijacked by these people.

Sworn Statement of Sheldine Jean Baptiste

Your affiant telephonically interviewed Sheldine Jean Baptiste **3/31/2022**. Jean Baptiste was not aware of her name, email, telephone number or address being used on CRA 2018 and 2020 corporate reinstatement paperwork or District 2 grant application. Jean Baptiste confirmed her correct mobile telephone number, and an older email address were used on the District 2 grant application. Like Pierre-Louis, Jean Baptiste had never heard of CRA and never consented to being a corporate officer. Further, Jean Baptiste was not aware of the grant or the use of her personal identifying information on the grant application. She stated she has never completed or signed any grant application for District 2 grants. No one had authority to use her information on any forms associated with this transaction. Jean Baptiste knows Evelt Jeudy as a close family friend. She knows Lauriston from working on his campaign and was paid by him for that work.

2020 CRA Reinstatement

Your affiant notes that CRA was reinstated a second time in 2020 on **June 30, 2020**. All information remained the same, except Chery was added as Vice President, at 11 NW 135 St, Miami, FL. The 2020 reinstatement states it was filed by Nadine Chery. Your affiant subpoenaed the payment information from the State of Florida Division of Corporation associated with this 2020 Reinstatement. According to the documents received in response thereto, the 2020 CRA reinstatement was paid for by Corporate Solutions Network, 1385 NW 111 Street, Miami, FL 786-327-1798. with an email address of *cralliancefl@gmail.com*.

According to subpoenaed documents, the telephone number associated with the 2020 reinstatement of CRA, 786-327-1798 is registered to Nadine Chery. The email address of *cralliancefl@gmail.com* is associated with Nadine Chery through Genesis Group Home, Inc. The listed recovery address for *cralliancefl@gmail.com*, 1385 NW 111 St Miami, FL is an address linked to Chery.

DISTRICT 2 SOLICITATION OF COUNTY VENDORS TO DONATE TO HSSSG

In reviewing the second, newer HSSSG bank accounts opened at WF by Lauriston and Chery with Moore as official signator on the account, your affiant noted several deposits of checks from organizations that are MDC vendors and/or are located in Miami-Dade County. Your affiant also notes that Lauriston referred to "donation checks" rolling in when texting with HSSSG Treasurer Moore. **Table 9** lists information from the face of the checks deposited into HSSSG as donations.



Table 9: HSSSG Donation Checks

Date of Activity	Check No.	ADDRESS USED FOR HSSSG	Fund Source	Amount	Memo
7/3/2017	4915	n/a	Universal Medical Centre PA 13377 W Dixie Hwy, North Miami, FL 33161	\$2,800	4-Soccer Tickets
8/10/2017	14133	n/a	Florida Partners, LLC 108 S. Monroe Street, Tallahassee, FL 32301	\$500	Jean Monestime's Dist. 2/Back to School
10/4/2017	2122616	480 NW 123 St Miami, FL 33168	WFB Ohio-Foundation, 115 Hospital Drive, Van Wert, OH 45891	\$1,000	
10/13/2017	2008	none	LEASA Industries Co, Inc 2450 NW 76 Street, Miami, FL	\$1,000	donation
11/1/2017	376	900 NE 125 St, Suite 200 Miami, FL 33161	Cornerstone Group Partners, LLC 2100 Hollywood Blvd, Hollywood, FL 33020	\$1,000	
11/16/2017	6480	850 NE 199 St	Odebrecht Construction. 201 Alhambra Circle, Suite 100, Coral Gables, FL	\$1,500	
5/18/2018	11322	none	Greater Miami Health and Training Center CHS/GMHETC Clerkship, 8260 NE 2nd Ave., Miami, FL 33138	\$2,000	
7/23/2018	536	900 NE 125 St, Suite 200 Miami, FL 33161	Cornerstone Group Partners LLC 2100 Hollywood Blvd, Hollywood, FL 33020	\$1,000	
10/15/2018	2363	none	LEASA Industries Co, Inc 2450 NW 76 Street, Miami, FL	\$1,000	donation to 501©
10/30/2018	21269	900 NE 125 St, Suite 200 Miami, FL 33161	South Florida Stadium, LLC dba Hard Rock Stadium 347 Don Shula Drive, Miami Gardens, FL	\$1,500	
			TOTAL STOLEN DONATIONS	\$13,300	

On July 3, 2017, a check was deposited from Universal Medical Centre, PA, located on West Dixie Highway in North Miami. OIG Auditor Cristin Revilla contacted this business to determine what prompted the donation. On 4/8/2022, Auditor Revilla was able to telephonically speak with Dr. Smith Joseph who advised the donation was solicited by Nadine Chery.

Your affiant investigated the other checks deposited into HSSSG. With the exception of Odebrecht Construction, (who has not responded to OIG telephonic requests for

information as of the date of this affidavit), the other checks were solicited by Commissioner Monestime's Office as a donation on behalf of the fraudulent corporation, HSSSG. County personnel and resources were wasted on the fraudulent solicitations originating out of Commissioner Monestime's District 2 Office. According to Commissioner Monestime, all decisions on soliciting donations were made by his Chief of Staff. Had he known Lauriston, or any other staff member would benefit from the solicitations, or that the charitable entity was fraudulent, he would have stopped the solicitations. Your affiant determined the following regarding the other donation checks.

On August 10, 2017, a check was deposited from Florida Partners, LLC 108 S. Monroe St. Tallahassee, FL 32301 for \$500. Your affiant contacted Florida Partners and spoke with Brian May who subsequently forwarded an email his office received from Melonie Burke with Commissioner Monestime's Office dated July 7, 2017. The email contained an embedded letter seeking back to school donations. Below is an excerpt from the District 2 solicitation letter:

Donations on our behalf are be made to *Haitian Senior Stars Solidarity Group Inc.*, a 501 (c) (3) organization and forwarded to 900 N.E. 125th Street, Suite 200, Miami, FL 33161 or you may call my district office at (305) 694-2779 and speak with Melonie Burke or via email melonie@miamidade.gov who will make arrangements to pick up your donation or donated items.

On October 13, 2017, and October 15, 2018, checks for \$1000 each were deposited from LEASA Industries Co., 2450 NW 76 Street, Miami. Your affiant spoke with Mr. Yap, the president of LEASA who advised that LEASA seeks ways to help the community. LEASA received a letter via US Mail from Commissioner Monestime's Office seeking donations for the upcoming Thanksgiving holiday, for "struggling families in District 2," and LEASA assisted by sending the checks. Mr. Yap located one letter and provided a scanned copy via email. Commissioner Monestime's letter did seek and direct donations to HSSSG, with Melonie Burke's name listed as the point of contact. The LEASA checks were handwritten, payable to HSSSG with memos indicating "donation" and donation to "501c", but no addresses were noted.

On November 01, 2017, and July 23, 2018, checks were deposited from Cornerstone Group Partners LLC, 2100 Hollywood Blvd, Hollywood, FL 33020 for \$1,000 each. The checks were mailed to 900 NE 125 St Suite 200 Miami, FL 33161, Commissioner Jean Monestime's District Office. Contact was made with a Cornerstone Group representative who provided the OIG with a letter from Commissioner Monestime dated October 6, 2017, seeking donations for a Thanksgiving drive for "struggling families in District 2," with Melonie Burke's name listed as the point of contact. Donations were requested for HSSSG and suggested that the check be mailed to Commissioner Monestime's Office.

On October 30, 2018, a \$1,500 check was deposited from South Florida Stadium, LLC dba Hard Rock Stadium 347 Don Shula Drive, Miami Gardens, FL. The check was made payable to HSSSG, dated October 19, 2018, and mailed to Haitian Senior Stars Solidarity Group, Inc. 900 NE 125 St Suite 200 Miami, FL 33161, i.e., Commissioner Monestime's District Office.

Your affiant was present during a sworn statement provided by Melonie Burke at the State Attorney's Office. According to Burke, Lauriston approved all District 2 solicitation letters.

A review of the withdrawals on the account reveals that it does not appear that the donation checks were used for the intended purposes of the donations. Instead, it appears that money was paid out of the account to the defendants, their companies, and miscellaneous expenses.

FRAUDULENT P-CARD TRANSACTIONS

The Miami-Dade County Purchasing Card Program (PCard) gives County employees the ability to purchase items directly from merchants/vendors without going through the "Small Purchase Order" process saving time, eliminating the need to use petty cash funds, and reducing paperwork. PCards are credit cards, with the usage billed to the respective user's department. PCards are only to be used for a legitimate MDC purpose. They are not to be used for any employee's personal benefit. Commissioner Monestime staff members were assigned and used PCards. According to Commissioner Monestime, the use of PCards by his employees is at the sole discretion of his Chief of Staff.

A review of the PCard usage for Commissioner Monestime's Office revealed usage at Corporate Solutions Network as follows:

Card #	Date	Vendor Name	Amount
0052	07/25/2018	SQ CORPORATE SOLUTIONS N	\$ 924.00
7584	05/07/2017	SQ CORPORATE SOLUTIONS N	\$ 4,840.00
7584	05/14/2017	SQ CORPORATE SOLUTIONS N	\$ 4,342.00
1391	12/12/2019	SQ CORPORATE SOLUT	\$ 481.00
1391	12/18/2019	SQ CORPORATE SOLUT	\$ 371.00
1391	02/24/2020	SQ CORPORATE SOLUTIONS N	\$ 3,767.40
1391	02/25/2020	SQ CORPORATE SOLUTIONS N	\$ 2,521.78
7162	08/09/2016	SQ CORPORATE SOLUTIONS N	\$ 2,865.00
7162	08/26/2016	SQ CORPORATE SOLUTIONS N	<u>\$ 1,950.00</u>
			\$ 22,062.18

According to County Finance, PCard accounts are assigned as follows:

PCard account ending in 0052 is assigned to Evelt Jeudy.

PCard account ending in 1391 is assigned to Elizabeth Owens.

PCard account ending in 7584 is assigned to Mac-Kinley Lauriston.

PCard account ending in **7162 was assigned to Regina Serrano.**

In a sworn statement provided to the State Attorney's Office, Elizabeth Owens (Owens) advised that she became Chief of Staff after Lauriston took a leave of absence to run for Mayor. Burke remained as events coordinator and contracted CSN to provide party supplies such as chairs, tables, and tents. Owens was new to events planning and relied on Burke who was experienced and had a list of vendors. Owens used her PCard to pay for four of the above transactions. Had Owens known that Lauriston benefitted, she would

not have approved CSN as a District 2 vendor or used her PCard. Your affiant notes that at the time of these transactions with CSN, Lauriston was still employed by MDC and as such, subject to County ethics rules.

Your affiant has interviewed former District 2 employee Regina Serrano regarding her PCard usage at CSN. Serrano stated that she never used her PCard at Corporate Solutions Network. When told the dates of the two transactions, Serrano stated that she was no longer working for Commissioner Monestime at the time the PCard was used. Serrano was transferred to another department and turned in her PCard and mobile phone to Lauriston. She cleaned out her desk and left for vacation on a Friday. Your affiant believes that the Friday Serrano left was August 05, 2016. Your affiant's basis for this belief is the lack of MDC email communications as of that date. Serrano provided her personal Chase payment card bill documenting out of state expenses and family photographs starting August 11, 2016. Your affiant contacted Serrano's new supervisor, who corroborated Serrano's transfer to another department on August 22, 2016, before the date of the second PCard transaction. It is clear from Serrano's email usage that on the date of the second PCard transaction dated August 26, 2016, Serrano was working in a different MDC department.

Serrano's above listed PCard transactions contained customer signatures. Serrano viewed the signatures and advised she did not sign the receipts. The signatures are not hers. Moreover, she gave no one permission to use her assigned PCard or sign her signature on her behalf.

The notation "SQ" ahead of the merchant's name, "Corporate Solutions N" indicates "Square Inc.", a financial services company that among other services, provides mobile payment card processing. Square captures technology to identify the users. According to Square, the Corporate Solutions Network merchant account was created August 09, 2016, under the name Johane Cothiere, 1385 NW 111 St Miami, FL 33167, email address csnincorporated@gmail.com, telephone number 786-327-1798.

According to Cothiere, she was not aware of nor opened the Square account, but she provided her personal identifiable information to her cousin, Chery. According to Square, one of the device identification numbers used to transact payments for the Corporate Solutions Network account was 355611080012151. According to T-Mobile, device identification number 355611080012151, used for the Square transaction is registered to Nadine Chery for telephone number 954-478-1299. According to T-Mobile, telephone number 786-327-1798 used for the Square account applications is registered to Nadine Chery.

LAURISTON KICKBACK OF PCard FUNDS

A Lauriston PCard transaction was identified, payable to Konnexion Multicenter, LLC as follows:

Card #	Date	Vendor Name	Amount
7584	5/16/2017	SQ KONNEXION & BB	\$4,775.00

PCard account ending in 7584 was issued to Mac-Kinley Lauriston.

According to Tropical Financial Credit Union, on May 19, 2017, Square settled a transaction payable to a Konnexion Multicenter, LLC deposit account ending in 9610 for \$4,607.72. This amount is the difference after Square customer usage fees are subtracted from the transactions amount of \$4,775. Konnexion Multicenter, LLC is the business of Bernadette Demosthene, AKA Bibi. According to Exceus, she is the person in charge of Commissioner Monestime's social media accounts. On May 23, 2017, a check was drawn on the same Konnexion Multicenter account made payable to Corporate Solutions Network for \$4,607.72, the exact amount paid to Konnexion Multicenter, LLC via PCard (less fees). This Konnexion check was deposited into CSN checking account at WF ending in 0491.

MDC GRANTS AWARDED DIRECTLY TO DEFENDANTS' COMPANIES: CSN AND 5 DIAMONDS

Your affiant has discovered three (3) MDC grants issued directly to defendants' companies. These grants were obtained via false information and/or false applications. The funds were paid to the defendants' companies.

District 2 Mom and Pop Grant to 5 Diamonds

Your affiant discovered a spreadsheet of grantees in a review of Lauriston's emails. The spreadsheet is titled, *District 2 Jean Monestime 2016-2017 Mom and Pop Small Business Grant Program County Data Sheet*. The spreadsheet indicates that 25 grants were awarded totaling \$82,000. Two grants, each in the amount of \$5,000, were awarded to CSN (listed as number 1 on the list) and 5 Diamonds, Inc (listed as number 8).

Neighbors and Neighbors (NANA), which is a real fiscal agent for the County, issues grants funded through a separate funding source than District 2 discretionary funds grants. A potential grantee is required to submit an application. The application can be submitted directly to NANA, or to a particular Commissioner's Office. NANA grants are awarded per Commission District, by a selection committee. After selected for award, the grantee must also attend a mandatory meeting to sign a contract agreement. That agreement is notarized. According to District 2 social media advertising of these Mom and Pop grants, applications directed to District 2 must be to the attention of Evelt Jeudy.

The 5 Diamonds grant application is dated 1/22/17. Your affiant also obtained the 5 Diamonds grant agreement for Allocation of Mom and Pop Program Funds dated 5/25/2017. They both indicate that the Commission District is District 2. The contact person is Nadine Chery with her known cell phone number. The grant agreement is notarized by a notary and bears the known signature of Chery. The purpose of the grant was purportedly for "Inventory and marketing Professional Services." Pursuant to this application, 5 Diamonds received MDC check dated 10/20/2017 in the amount of \$5,000 District 2 Mom and Pop Grant, from NANA. This check was deposited into the 5 Diamonds BOA account 5570 on 11/6/2017.

District 2 Mom and Pop Grant to CSN

Your affiant has obtained and reviewed a grant application submitted to NANA from CSN dated 1/19/2017. The grant application was completed and signed by Johane Cothiere, at Chery's direction. Ms. Cothiere stated she was not sure why she was filling out the paperwork. Ms. Cothiere was shown the 5/25/2017 document which is signed after the grant is approved for award. This document is purportedly signed by Cothiere and notarized. However, when shown her notarized signature, Ms. Cothiere testified that she never appeared before any notary. Instead, she gave the application to Chery.

On 12/14/2017, MDC check 133251 was issued to CSN in the amount of \$5,000. On the same date, this check was picked up by Lauriston. This check was deposited into the WF CSN account ending in 0491 on 12/21/2017. This check was issued pursuant to the Mom and Pop grant and the fraudulent application with Johane Cothiere's purportedly notarized signature.

District 2 House Beautification Grant to CSN

Your affiant discovered a second county grant payable to CSN. MDC check 03072955 dated 2/28/2019 was paid to CSN pursuant to a submitted CSN invoice. This check was deposited into the CSN WF 0491 on 3/5/2019. The invoice indicates that the funds will be used to beautify two properties: 11 NW 135 Street and 480 NW 123 St—the two surplus houses obtained by the defendants via HSSSG. Your affiant notes that the check wasn't issued until 2/28/2019—well after Lauriston's leave of absence which began 9/8/2018.

However, a review of the related grant documents reveals that the foundation for this grant was put in place while Lauriston was still Chief of Staff. Your affiant notes that the BCC final resolution was passed on 7/10/2018, when Lauriston—well before Lauriston's leave of absence. The CSN invoice is dated 11/18/2018 and is directed to the Commissioner's Office, to the attention of Evelt Jeudy. This invoice was processed by the District 2 staff despite Jeudy's actual knowledge of Lauriston's involvement with HSSSG and CSN. Jeudy had a fiduciary duty as a public servant to stop this grant from proceeding, based upon his actual knowledge. He failed to do so.

CRIMINAL VIOLATIONS

Based upon the foregoing, it is submitted by your Affiant that there exists probable cause to believe that LAURISTON, CHERY AND JEUDY, did knowingly commit the following crimes:

MAC-KINLEY LAURISTON:

STATUTE	TYPE & DEGREE	COUNTS	CHARGE
895.03	Felony 1 st	1	Racketeering
817.034(4)(A)1	Felony 1 st	1	Organized Fraud over \$100,000
117.105	Felony 3 rd	2	Notary Fraud – as a principal
812.014(2)(b)	Felony 2 nd	2	Grand Theft \$20k - \$100k
838.016(1)	Felony 2 nd	2	Unlawful Compensation/Reward for Official Behavior
838.022	Felony 3 rd	4	Official Misconduct (before 10/1/16)
838.022	Felony 3 rd	16	Official Misconduct
817.535(2)(a)	Felony 3 rd	3	Unlawfully File False Document
817.568(2)(a)	Felony 3 rd	5	Identity Theft – Fraudulent Use
817.568(2)(b)	Felony 2 nd	4	Identity Theft – Fraudulent Use – Pecuniary Value \$5,000 or more
817.568(8)(b)	Felony 2 nd	2	Identity Theft – Dissolved Business Entity – Pecuniary Value \$5,000 or more
812.014(2)(c)	Felony 3 rd	10	Grand Theft - \$750 - \$20,000
2-11.1(G)	Misd 2	1	Exploitation of Official Position
2-11.1(E)3	Misd 2	1	Conflict of Interest – Solicit – Demand Gift
2-11.1(E)4	Misd 2	1	Conflict of Interest – Failure to Disclose Gift

NADINE CHERY

STATUTE	TYPE & DEGREE	COUNTS	CHARGE
895.03	Felony 1 st	1	Racketeering
817.034(4)(A)1	Felony 1 st	1	Organized Fraud over \$100,000
812.014(2)(b)	Felony 2 nd	2	Grand Theft \$20k - \$100k
817.535(2)(a)	Felony 3 rd	3	Unlawfully File False Document
817.568(2)(a)	Felony 3 rd	5	Identity Theft – Fraudulent Use
817.568(2)(b)	Felony 2 nd	4	Identity Theft – Fraudulent Use – Pecuniary Value \$5,000 or more
817.568(8)(b)	Felony 2 nd	2	Identity Theft – Dissolved Business Entity – Pecuniary Value \$5,000 or more
812.014(2)(c)	Felony 3 rd	9	Grand Theft - \$750 - \$20,000

EVELT JEUDY

STATUTE	TYPE & DEGREE	COUNTS	CHARGE
895.03	Felony 1 st	1	Racketeering
817.034(4)(A)1	Felony 1 st	1	Organized Fraud over \$100,000
117.105	Felony 3 rd	2	Notary Fraud -- as a principal
812.014(2)(b)	Felony 2 nd	2	Grand Theft \$20k - \$100k
838.016(1)	Felony 2 nd	1	Unlawful Compensation/Reward for Official Behavior
838.022	Felony 3 rd	4	Official Misconduct (before 10/1/16)
838.022	Felony 3 rd	15	Official Misconduct
817.535(2)(a)	Felony 3 rd	3	Unlawfully File False Document
817.568(2)(a)	Felony 3 rd	5	Identity Theft -- Fraudulent Use
817.568(2)(b)	Felony 2 nd	4	Identity Theft -- Fraudulent Use -- Pecuniary Value \$5,000 or more
817.568(8)(b)	Felony 2 nd	2	Identity Theft -- Dissolved Business Entity -- Pecuniary Value \$5,000 or more
812.014(2)(c)	Felony 3 rd	6	Grand Theft - \$750 - \$20,000
2-11.1(G)	Misd 2	1	Exploitation of Official Position
2-11.1(E)3	Misd 2	1	Conflict of Interest -- Solicit -- Demand Gift
2-11.1(E)4	Misd 2	1	Conflict of Interest -- Failure to Disclose Gift

FURTHER, AFFIANT SAYETH NOT



OIG Special Agent Bassam Fadel
Affiant

Sworn to and subscribed before me on this the 28 of April, 2022 by Affiant BASSAM FADEL.



Circuit Court Judge
Eleventh Judicial Circuit
Miami-Dade County, Florida