

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

CASE NO.: 2023-CA-009267

CINDY FALCO-DICORRADO,

Plaintiff,

v.

KELSEY V. SHULTS, et al.,

Defendants.

---

**DEFENDANTS' MOTION TO DISMISS**

The Defendants Judge Bradley Harper, Jeremiah Romano, and Dave Aronberg (Defendants), through undersigned counsel, seek dismissal of this case with prejudice based on Defendants' entitlement to immunity from Plaintiff Cindy Falco-Di Corrado's (Plaintiff)<sup>1</sup> claims on the basis of sovereign immunity, judicial and prosecutorial immunity, qualified immunity, Plaintiff's failure to state a cause of action, Plaintiff's failure to allege compliance with the

---

<sup>1</sup> Plaintiff's Amended Complaint (ECF No. 21) lists herself as a co-plaintiff to "The People, who Organically Constitute our Socially-Compacted "Body-Politic", of our Constitutional "State of Florida", (& here-under, also of these "United States of America")" and claims that she is representing this group of people (which apparently constitutes every person in the United States of America) as "Private Attorney Generals". See Amended Complaint at 2. Additionally, Plaintiff seeks to represent her husband for the alleged impoundment of his car which is "in his name". *Id* at 5. Through her Amended Complaint, Plaintiff has violated Fla. Stat. Ann. § 454.23, and thus committed a third degree felony, which prohibits any person who is not licensed to practice law in this state from willfully pretending to be qualified to practice law or willfully using any name, title, addition, or description implying that she is qualified to practice law Plaintiff is not an Attorney General, private or otherwise, nor is she authorized to practice law in this state. Because Plaintiff cannot represent her husband much less every person in the United States of America, Defendants can only respond to the claims that she has raised in representing herself as a *pro se* litigant.

condition precedents of Fla. Stat. §768.28, and Defendants’ Immunity pursuant to Fla. Stat. §768.28(9)(a) and in support thereof states:

### **BACKGROUND**

Plaintiff alleges that, a grand conspiracy among the sixteen named defendants in this case resulted in her arrest and subsequent involvement in a misdemeanor case for trespassing outside of a La Granja restaurant and resisting arrest, which was dismissed *nolle prosequere*, her subsequent arrest and finding of guilt for trespassing and resisting arrest at an Einstein Bagel. *See* Amended Complaint at 3 and 6. Plaintiff specifically alleges that the Defendants Aronberg and Romano “reasonably should have known” that her misdemeanor case was “1: a Travesty of Justice; 2: Should Not Even be Brought by him to Court; & 3: Waste the Court’s Valuable Time & other Resources” and that Defendant Judge Harper “reasonably should have known” that all claims against “we Co-Plaintiffs here-in”<sup>2</sup> “should be Immediately Dismissed”. *See* Amended Complaint at page 8. Based on these claims, Plaintiff seeks as remedy that each defendant be fined several million dollars and spend one to five years in jail as punishment for their involvement in her misdemeanor case. *See* Amended Complaint at page 9.

### **PROCEDURAL HISTORY**

1. On May 30, 2020, Plaintiff was arrested outside of a restaurant called La Granja on charges of trespass after warning and resisting arrest without violence. *See* Exhibit A – Probable Cause Affidavit 2020MM004494

---

<sup>2</sup> As previously described Plaintiff includes both herself individually and every person in the United States of America, who she claims to personally represent as a private attorney general , as co-plaintiffs.

2. On January 14, 2021, Plaintiff was arrested at an Einstein Bagel on charges of trespass after warning and resisting arrest without violence. *See* Exhibit B – Probable Cause Affidavit 2021MM000372
3. On April 12, 2021, the misdemeanor case against Plaintiff for trespass after warning and resisting arrest without violence, *State of Florida v. Cindy Dicorrado*, 2020MM004494 (15th Cir. Fla., 2020), was dismissed *nolle prosequere* based on the determination by defendants Aronberg and Romano of insufficient evidence after probable cause had been found. *See* Exhibit C – Nolle Prosequere.
4. On February 28, 2022, Plaintiff was tried and found guilty of trespass and resisting arrest without violence, *State of Florida v. Cindy Dicorrado*, 2021MM000372 (15th Cir. Fla., 2021). *See* Exhibit D – Judgment.
5. On April 11, 2023 Plaintiff filed her initial Complaint (ECF No. 4) and issued summons against the Defendants.
6. On April 12, 2023, Plaintiff filed her Amended Complaint.

#### MEMORANDUM OF LAW

The Plaintiff's claims for solely punitive damages against the Defendants are barred by the doctrines of sovereign immunity, judicial and prosecutorial immunity, and qualified immunity. In addition, the Amended Complaint fails to state a plausible claim that the Defendants are liable for the alleged punitive damages, i.e. "Transgression Fees & Punishments", that Plaintiff seeks. Finally, Plaintiff has failed to submit the necessary pre-suit notice to Defendants and the Department of Financial Services. Because the Plaintiff's Amended Complaint fails to state a claim for which relief may be granted it is subject to dismissal with prejudice.

#### **I. SOVEREIGN IMMUNITY BARS PLAINTIFFS' CLAIMS**

To the extent that Plaintiff's Amended Complaint has brought any claims against the Defendants based on their official capacity, Plaintiff's claims against Defendants are barred by sovereign immunity, which has been waived only in the limited circumstances expressed in Fla. Stat. § 768.28. According to Fla. Stat. § 768.28(5)(a):

The state and its agencies and subdivisions shall be liable for tort claims in the same manner and to the same extent as a private individual under like circumstances, but liability shall not include punitive damages or interest for the period before judgment. Neither the state nor its agencies or subdivisions shall be liable to pay a claim or a judgment by any one person which exceeds the sum of \$200,000 or any claim or judgment, or portions thereof, which, when totaled with all other claims or judgments paid by the state or its agencies or subdivisions arising out of the same incident or occurrence, exceeds the sum of \$300,000.

Plaintiff alleges that Defendants vaguely deprived her of her rights via the prosecution of a misdemeanor case against her and based on this claim is demanding thirty-two-million dollars in punitive damages.<sup>3</sup> Plaintiff does not attribute any compensatory damages to the Defendants. Because Plaintiff's Amended Complaint only seeks punitive damages which exceed the sum of \$200,000 her claim is barred by Fla. Stat. § 768.28(5)(a). The Florida limited waiver of sovereign immunity statute further provides that:

The state or its subdivisions shall not be liable in tort for the acts or omissions of an officer, employee, or agent committed while acting outside the course and scope of her or his employment or committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

*Id.* Plaintiff's allegations do not show that the Defendants acted in bad faith or in wanton and willful disregard of human rights since, by her own admission Defendants relied on an affidavit of

---

<sup>3</sup> See Amended Complaint at 9 in which Plaintiff lists the entirety of her "specific Remedy & Restitution" and demands that defendant Aronberg pay her twelve million dollars and serve five years in jail, that defendant Judge Harper pay her ten million dollars and serve one year in jail, and that defendant Romano pay her ten million dollars and serve one year in jail all of which she describes as "Transgression Fees & Punishments".

probable cause. Plaintiff only alleging that the Defendants “Reasonably Should Have Known” that her misdemeanor case was baseless. *See* Amended Complaint at 8-9 and Exhibit A. Because Plaintiff’s Amended Complaint fails to allege facts that would plausibly support a claim that Defendants acted in bad faith or with a malicious intent or that they acted outside the scope of their employment and because Plaintiff’s Amended Complaint solely seeks punitive damages which are specifically barred by Fla. Stat. § 768.28(5)(a), the Amended Complaint must be dismissed on the basis of sovereign immunity.

## II. JUDICIAL AND PROSECUTORIAL IMMUNITY BARS PLAINTIFFS’ CLAIMS

Judicial officers are absolutely immune from suits for damages based on actions taken in their judicial capacities and within their jurisdiction. *Stump v. Sparkman*, 435 U.S. 349 (1978) (finding that state court judge who granted parent’s petition for sterilization of minor daughter was immune from damages liability even if his approval of the petition was in error). A judge is not civilly liable for damages for acts done within the scope of his jurisdiction and for actions taken for the “conduct of the business of his court.” *Farish v. Smoot*, 58 So. 2d 537-38 (Fla. 1952).

As an extension of judicial immunity, “[p]rosecutors enjoy absolute immunity from lawsuits for damages resulting from the performance of their quasi-judicial functions of initiating or maintaining a prosecution. *Swope v. Krischer*, 783 So. 2d 1164, 1167 (Fla. Dist. Ct. App. 2001). The rationale for this “... rests upon public policy that a strict guarantee of immunity is necessary to preserve the effectiveness and impartiality of judicial and quasi-judicial offices.” *Qadri v. Rivera-Mercado*, 303 So. 3d 250, 257 (Fla. Dist. Ct. App. 2020). The District Court of Appeal in *Qadri* specifically held that “[t]he prosecutor is shielded from liability for damages for commencing and pursuing the prosecution, regardless of any allegations that his or her actions were undertaken with an improper state of mind or improper motive.” *Id* at 256.

Whether an act is “judicial” relates to “the ‘nature’ and ‘function’ of the act, not the ‘act itself.’” *Mireles v. Waco*, 502 U.S. 9, 13 (1991) (reversing decision that judge’s direction to police officers to carry out a judicial order with excessive force was not an action taken in his judicial capacity), citing *Stump*, 435 U.S. at 362. This immunity applies even when the judge’s acts are alleged to have been done “maliciously or corruptly” or “in excess of their jurisdiction.” *Stump*, 435 U.S. at 356, quoting *Bradley v. Fisher*, 80 U.S. 335, 351 (1871). A judge is subject to liability only when he acts in the “clear absence of all jurisdiction.” *Id.* “[I]t is a general principle of the highest importance to the proper administration of justice that a judicial officer, in exercising the authority vested in him, shall be free to act upon his own convictions, without apprehension of personal consequences to himself.” *Mireles*, 502 U.S. at 10. (Internal citations omitted). If the act is determined to be a judicial act, it is protected by judicial immunity, no matter how unfair, injurious or inappropriate it might be, provided it meets the second prong of the test concerning jurisdiction. *Kalmanson v. Lockett*, 848 So. 2d 374, 378–79 (Fla. Dist. Ct. App. 2003).

Plaintiff has alleged that she is entitled to punitive damages as a result of actions allegedly taken by the Defendants in their respective duties as judicial and quasi-judicial officers in the prosecution of her misdemeanor case based on probable cause. Dismissal is required since these all of the alleged conduct done by the Defendants were done as part of their normal judicial function in the courtroom regarding a case which was before them in their judicial capacity and since the party in question in the underlying misdemeanor case was within Palm Beach County she was within Defendants’ jurisdiction as judicial and quasi-judicial officers.

### **III. QUALIFIED IMMUNITY BARS PLAINTIFFS’ CLAIMS**

In addition to the protections of sovereign, judicial, and prosecutorial immunity, Defendants are protected from suit as long as their conduct did not violate clearly established

constitutional rights of which a reasonable person would have known. Dismissal on the basis of qualified immunity is proper “if the complaint fails to allege the violation of a clearly established constitutional right.” *Smith v. Siegelman*, 322 F.3d 1290, 1294 (11th Cir. 2003). (Internal citations omitted). The Plaintiff’s broad allegations that the Defendants conspired to violate her rights are based solely upon the Defendants’ involvement in a misdemeanor case<sup>4</sup> which was brought up on probable cause and which was ultimately dismissed by the Defendants. There is no evidence or support that the Defendants acted in bad faith or with malicious purpose or even that Plaintiff was harmed by the alleged actions; rather, the Plaintiff’s Amended Complaint appears to be purely retaliatory due to a perceived slight against her since she solely seeks punitive damages against the Defendants based on their presence in a misdemeanor case brought against her upon probable cause.

#### **IV. PLAINTIFF HAS FAILED TO STATE A CAUSE OF ACTION**

To survive a motion to dismiss for failure to state a claim, a complaint “must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009), quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007). A court need not “accept internally inconsistent factual claims, conclusory allegations, unwarranted deductions, or mere legal conclusions made by a party.” *Other Place of Miami v. City of Hialeah Gardens*, 353 So. 2d 861, 866 (Fla. 3d DCA 1977). “Mere statements of opinion or conclusions unsupported by specific facts” are insufficient to state a cause of action. *Id.* at 862. A court is not bound by “bare allegations which are unsupported or unsupportable.” *Id.* See also *Brandon v. Pinell*, 141 So. 2d 278, 279 (Fla. 2d DCA 1962). Dismissal is appropriate where the

---

<sup>4</sup> Plaintiff specifically accuses Defendants of “Malicious Prosecution of Their False-Accusations Based Criminal Case against me”. See Amended Complaint at page 9.

Complaint's allegations are vague, imprecise and conclusory. *Foley v. Hialeah Race Course*, 53 So. 2d 771 (Fla. 1951); *JRD Dev. of Brevard, Inc. v. City of Cocoa Beach*, 896 So. 2d 823, 824 (Fla. 5th DCA 2005); *Beckler v. Hoffman*, 550 So. 2d 68, 70 (Fla. 5th DCA 1989); *Hall v. Key*, 476 So. 2d 787, 789 (Fla. 1st DCA 1985); *Carroll v. Magnaflux Corp.*, 460 So. 2d 991, 992 (Fla. 4th DCA 1984).

Plaintiff does not allege any facts that can articulate that Defendants engaged in the claims asserted and instead merely alleges that judicial and quasi-judicial officers should simply know better than to bring any misdemeanor case against her<sup>5</sup> despite any probable cause affidavit. The Complaint must be dismissed since Fla. R. Civ. P. Rule 1.110 clearly states that the complaint must contain:

(1) a short and plain statement of the grounds upon which the court's jurisdiction depends, unless the court already has jurisdiction and the claim needs no new grounds of jurisdiction to support it, (2) a short and plain statement of the ultimate facts showing that the pleader is entitled to relief, and (3) a demand for judgment for the relief to which the pleader deems himself or herself entitled. Relief in the alternative or of several different types may be demanded. Every complaint shall be considered to pray for general relief.

A complaint that fails to state an element that makes up the cause of action is properly dismissed. *Maciejewski v. Holland*, 441 So. 2d 703, 704 (Fla. 2d DCA 1983). Although the court "must accept the facts alleged as true and make all reasonable inferences in favor of the pleader, conclusory allegations are insufficient." *Stein v. BBX Capital Corp.*, 241 So. 3d 874, 876 (Fla. 4th DCA 2018) (Internal citations omitted) (finding that dismissal is appropriate where a plaintiff alleging a breach of a fiduciary duty failed to assert fraud or material misrepresentation.) Dismissal is appropriate where "the party seeking dismissal has conclusively demonstrated that plaintiff could prove no set of facts whatsoever in support of the cause of action." *Almarante v. Art Inst. of*

---

<sup>5</sup> Or indeed any misdemeanor case against her co-plaintiff, every person in the United States.



*Fort Lauderdale, Inc.*, 921 So. 2d 703, 705 (Fla. 4th DCA 2006).

Plaintiff's claims against Defendants are based solely upon conclusory, vague, and speculative allegations which do not place Defendants on notice as to what it is that they specifically did giving rise to this suit, which does not state any elements or in fact any actionable claim that would make up their cause of action, and imply that no judicial or quasi-judicial officers can bring misdemeanor cases against anyone even if a probable cause affidavit is provided.

*Plaintiffs' Complaint Fails to Establish A Conspiracy Claim Against Defendant*

Plaintiff's Complaint vaguely alleges that Defendants was in league with every officer involved in her arrest, her former defense counsel, the clerk of court, a customer at an Einstein Bagel, and "the group known as 'Black Lives Matter'". See Amended Complaint at page 6 and 8-9. Plaintiff's general claim of a conspiracy to violate her rights is based solely upon the fact that a misdemeanor case was brought against her even though it was ultimately dismissed, simply concluding that every entity named in her Amended Complaint is generally plotting against her.

In order to establish a claim of conspiracy, a plaintiff must prove that there is an actionable claim which caused damage. *Balcor Prop. Mgmt., Inc. v. Ahronovitz*, 634 So. 2d 277, 279 (Fla. 4th DCA 1994) (finding that the underlying offense of civil theft must be actionable before the charge of civil conspiracy may be properly maintained).<sup>6</sup> Not only does this underlying tort need to be alleged, but a plaintiff also has the burden of proving the tort before pursuing their conspiracy claim.<sup>7</sup> Where an actionable underlying tort or wrong is found, a plaintiff would have to satisfy four elements of a conspiracy claim: "... (a) a conspiracy between two or more parties, (b) to do

---

<sup>6</sup> See also *Yaralli v. American Reprographics Co., LLC*, 165 So.3d 785, 789 (4th DCA 2015) which held that a cause for conspiracy requires an actionable underlying tort.

<sup>7</sup> "[I]f the underlying tort which forms the basis for a civil conspiracy is not proved, then there can be no recovery for the alleged conspiracy." *Lake Gateway Motor Inn, Inc. v. Matt's Sunshine Gift Shops, Inc.*, 361 So. 2d 769, 772 (Fla. 4th DCA 1978).

an unlawful act or to do a lawful act by unlawful means, (c) the doing of some overt act in pursuance of the conspiracy, and (d) damage to plaintiff as a result of the acts performed pursuant to the conspiracy.” *Walters v. Blankenship*, 931 So. 2d 137, 140 (Fla. 5th DCA 2006) (Internal citations omitted).<sup>8</sup>

Plaintiff cannot allege an independent claim of conspiracy without proving that there is an actionable underlying tort. And while Plaintiff never alleges the specific elements of any underlying tort<sup>9</sup> and cannot prove any underlying tort; even if Plaintiff could do so, she still cannot meet the elements of conspiracy since: (a) Plaintiff cannot attribute any unlawful acts to the Defendants; (b) Plaintiff has failed to assert with specificity an overt act taken by Defendants in pursuance of a conspiracy; and (c) Plaintiff has not asserted what damage resulted from the actual acts of the Defendants. Plaintiff’s claims do not establish any of the necessary elements of a conspiracy claim and should be dismissed with prejudice.

#### **V. PLAINTIFF HAS FAILED TO PROVIDE PRE-SUIT NOTICE**

Plaintiff did not allege or include any proof of compliance with the pre-suit notice requirements outlined in Fl. Stat. § 768.28 (6). Before a tort claim can be filed against the state or

---

<sup>8</sup> These four elements have been recognized in the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, and 5<sup>th</sup> DCA; undersigned was unable to discover any 4th DCA case on point. *Kurnow v. Abbott*, 114 So. 3d 1099, 1102 (Fla. 1st DCA 2013); *Olson v. Johnson*, 961 So. 2d 356, 359 (Fla. 2d DCA 2007); *Kingland Estates, Ltd. v. Davis*, 170 So. 3d 825, 830 (Fla. 3d DCA 2015); *Walters v. Blankenship*, 931 So. 2d 137, 140 (Fla. 5th DCA 2006).

<sup>9</sup> Rather than alleging elements of specific torts, Plaintiff broadly accuses “All of the here-in Accused Public Servants” of violating their oath of office, being complicit in an unlawful search and seizure of unspecified property, participating in “Unlawful Takings & other Criminal Violations of the Principles of Liberty & Justice”, receiving and transferring “misappropriated &/or stolen trade secrets”, conspiring to “Use our US-Mail System” to “deprive Defendants intangible rights to receive honest services”, fraudulently obtain unspecified property, conspiring to “Criminally Trespass up-on these Co-Plaintiff’s Rights to Property”, conspiring to “Criminally” “De-Fraud our Florida Courts”, “Acting Beyond the Limits of their Corporate Franchise”, and injuring “Our Trademarks, Intellectual Property, & Trade Secrets”. See Amended Complaint at pages 7-8. None of these are underlying torts which could support a conspiracy claim by Plaintiff.

one of its agencies or subdivisions, the claimant must give written notice of the claim to the agency and to the Department of Financial Services within three years after the claim accrues and such claim must be denied by the Department of Financial Services or the appropriate agency in writing. Fl. Stat. § 768.28 (6). *See also Lederer v. Orlando Utilities Com'n* 981 So.2d 521 at 522 (5<sup>th</sup> DCA 2008). Section 768.28 of Florida Statutes is part of a statutory waiver of sovereign immunity and strict compliance is required. *See Levine v. Dade County Sch. Bd.*, 442 So.2d 210, 212 (Fla.1983). Under section 768.28(6), not only must the notice be given before a suit may be maintained, but also the complaint **must** contain an allegation of such notice. *Id.* at 231 citing *Commercial Carrier Corp. v. Indian River County*, 371 So.2d 1010 (Fla.1979) (emphasis added). In this case even though Plaintiff has brought suit against agents of the Office of State Attorney, defendants Aronberg and Romano, and an agent of the Fifteenth Judicial Circuit, Judge Bradley Harper, Plaintiff's Amended Complaint does not make any claim of having provided pre-suit notice in compliance with Fl. Stat. § 768.28 (6) nor has Plaintiff provided any evidence indicating that she has given the required pre-suit notice to the Department of Financial Services prior to filing suit and as such she is not in compliance with the pre-suit notice requirements outlined in Fl. Stat. § 768.28 (6) and her Amended Complaint should be dismissed.

#### **VI. DISMISSAL OF THE COMPLAINT SHOULD BE WITH PREJUDICE**

Although leave to amend may be given ordinarily, it need not be given where amendment would be futile and unable to state a cause of action. *Port Marina Condo. Ass'n, Inc. v. Roof Svcs., Inc.*, 119 So. 3d 1288, 1291 (Fla. 4th DCA 2013). Courts should deny leave to amend where there is prejudice to the opposing party. *Rohatynsky v. Kalogiannis*, 763 So. 2d 1270, 1272, (Fla. 4th DCA 2000). While the ability for a plaintiff to amend their complaint should be liberally given only when justice so requires, the court may deny such actions where "it is apparent that the

pleading cannot be amended to state a cause of action.” *Gladstone v. Smith*, 729 So. 2d 1002, 1003–04 (Fla. 4th DCA 1999), cause dismissed, 773 So. 2d 55 (Fla. 2000) (Internal citations omitted). Dismissal with prejudice is justified as there is nothing Plaintiff can allege that would overcome the basis for dismissal of the Amended Complaint and since any such amendment would prejudice the Defendants.

### **CONCLUSION**

Plaintiff’s suit against the Defendants fails to state a plausible claim for relief and, even if given an opportunity to further amend her pleading, the Plaintiff cannot overcome the Defendants’ right to sovereign immunity pursuant to Fla. Stat. §768.28(9)(a), the Defendants’ right to judicial and prosecutorial immunity, the Defendants’ right to qualified immunity, the Plaintiffs’ failure to state a cause of action, and the Plaintiff’s failure to allege compliance with the condition precedents of Fla. Stat. §768.28. Furthermore, since Plaintiff’s Amended Complaint fails to state a claim for which relief can be granted and any further amendment to this claim would be futile, dismissal of this action with prejudice is warranted.

**WHEREFORE**, Defendants Judge Bradley Harper, Jeremiah Romano, and Dave Aronberg request this Court Dismiss *with prejudice*, Plaintiff’s Amended Complaint on the basis of Defendants’ right to sovereign immunity pursuant to Fla. Stat. §768.28(9)(a), the Defendants’ right to judicial and prosecutorial immunity, the Defendants’ right to qualified immunity, the Plaintiffs’ failure to state a cause of action, and the Plaintiff’s failure to allege compliance with the condition precedents of Fla. Stat. §768.28.

Respectfully Submitted,

ASHLEY BROOK MOODY  
FLORIDA ATTORNEY GENERAL

CHRISTOPHER KONDZIELA

Assistant Attorney General  
Fla. Bar No. 0125255  
[Christopher.Kondziela@myfloridalegal.com](mailto:Christopher.Kondziela@myfloridalegal.com)  
Office of the Attorney General  
110 S.E. 6<sup>th</sup> Street, 10<sup>th</sup> Floor  
Fort Lauderdale, Florida 33301  
Telephone: 954-712-4600  
Facsimile: 954-527-3702

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 1, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I also certify that the foregoing document is being served on May 1, 2023, to Plaintiff Cindy Falco-Di Corrado via electronic mail to [openarmsandopenhearts@hotmail.com](mailto:openarmsandopenhearts@hotmail.com).

/s/ Christopher Kondziela  
CHRISTOPHER KONDZIELA  
Assistant Attorney General

**EXHIBIT A**

Driver's License, FL Vehicle Tag and Social Security Numbers are redacted from the original documents attached as exhibits.

NOT A CERTIFIED COPY

0516737

20004494

ARREST / NOTICE TO APPEAR  
Juvenile Referral Report

1. Arrest 2. N.T.A. 3. Request For Warrant 4. Request For Capias  
1 Juvenile N

Agency ORI Number: FLO 5 0 0 0 0 Agency Name: PALM BEACH COUNTY SHERIFF'S OFFICE Agency Report Number: 06 20073027

Charge Type: 1. Felony 2. Traffic Felony 3. Misdemeanor 4. Traffic Misdemeanor 5. Ordinance 6. Other  
Multiple Clearance Indicator: 0 1

Location of Arrest (Including Name of Business): 1941 S Military Trail West Palm Beach Location of Offense (Including Name of Business): 1941 S Military Trail West Palm Beach FL 33409

Date of Arrest: 05/30/2020 Time of Arrest: 1400 Booking Date: Booking Time: Jail Date: Jail Time: Location of Vehicle:

Name (Last, First, Middle): Dicorrado Cindy Alias (Name, DOB, Soc. Sec. # Etc.):

Race: W - White 1 - American Indian 2 - Black 3 - Oriental/Asian Sex: F Date of Birth: 9/12/68 Height: 510 Weight: 165 Eye Color: Brown Hair Color: Brown Complexion: med Build: med

Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description): unknown Marital Status: Married Religion: Christian

Local Address (Street, Apt. Number): 316 NW 1ST AVE Boynton Beach FL 33435 Phone: 904 501 3082 Residence Type: 1 City 2 County 3 Private 4 Suburban 5 Other: 3

Permanent Address (Street, Apt. Number): Same As Local Address Source: verbal

Business Address (Street, Apt. Number): City: State: Zip: Phone: Occupation: Minister

DL Number, State: Social Security Number: INS Number: Place of Birth: Miami Florida Citizenship: USA

Co-Defendant Name (Last, First, Middle): Race: Sex: Date of Birth: 1. Arrested 2. At Large 3. Facility 4. Misdemeanor 5. Juvenile

Co-Defendant Name (Last, First, Middle): Race: Sex: Date of Birth: 1. Arrested 2. At Large 3. Facility 4. Misdemeanor 5. Juvenile

Parent Legal Guardian Other: Name (Last, First, Middle): Phone:

Address (Street, Apt. No.): City: State: Zip: Business Phone:

Notified By (Name): Date: Time: Juvenile Disposition: 1. Held/Processed within Det. and Released 2. TOT HRS/DYS 3. Incarcerated

Released To (Name): Relationship: Date: Time: School Attended: Grade:

The above address was provided by: 1. defendant and/or 2. defendant's parents. The child and/or parent was told to keep the Juvenile Court Clerk's Office (Phone 561-395-2526) informed of any address change. Yes, by (Name): No (Reason):

Property Crime? Yes No Description of Property: Value of Property:

Drug Activity: S. Sell R. Struggle K. Dispense M. Manufacture/Produce Cultivate Z. Other Drug Type: N. N/A A. Amphetamine B. Barbiturate C. Cocaine E. Heroin H. Hallucinogen M. Marijuana P. Paraphernalia/Equipment U. Unknown Z. Other

Charge Description: RESIST WITHOUT VIOLENCE Counts: 1 Domestic Violence: Y N Statute Violation Number: 843.02 Violation or ORD. #: OR

Drug Activity: n Drug Type: n Amount/Unit: n/a Offense #: 20073027 Warrant/Capias Number: Bond:

Charge Description: Trespass after Warning Counts: 1 Domestic Violence: Y N Statute Violation Number: 810.09 2b Violation or ORD. #: OR

Drug Activity: n Drug Type: n Amount/Unit: n/a Offense #: Warrant/Capias Number: Bond: N/A

Charge Description: T Counts: Domestic Violence: Y N Statute Violation Number: Violation or ORD. #:

Drug Activity: Drug Type: Amount/Unit: Offense #: Warrant/Capias Number: Bond:

Charge Description: Counts: Domestic Violence: Y N Statute Violation Number: Violation or ORD. #:

Drug Activity: Drug Type: Amount/Unit: Offense #: Warrant/Capias Number: Bond:

Location (Court, Address, Room Number): 3228 Gun Club Rd West Palm Beach Fl

Court Date and Time: Month: 07 Day: 08 Year: 2020 Time: 8:30 AM PM

I AGREE TO APPEAR AT THE ABOVE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT I SHOULD WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS NOTICE TO APPEAR, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent/Custodian): Date Signed: Signature of Arresting Officer: Name of Arresting Officer: D/S M. CASTEEL ID #: 28275 Name Verification (Printed by Arrestee): (PRINT)

Name: Dangerous Suicidal Restricted Arrest Other: Transporting Officer: D/S M. CASTEEL ID #: Agency: PBSO

Witness here if subject signed with an "X" Page: 1

HOLD For Other Agency: Name: Dangerous Suicidal Restricted Arrest Other: Transporting Deputy: [Signature]

Stamp: MAY 31 AM 7:00

DBTS Number		<b>PROBABLE CAUSE AFFIDAVIT</b>		1. Arrest	3. Request For Warrant	1	Juvenile	N
Agency ORI Number <b>FLO 5 0 0 0 0 0</b>		Agency Name <b>PALM BEACH COUNTY SHERIFF'S OFFICE</b>		Agency Report Number <b>06</b>		20073027		
Charge Type Check as many as apply:		Special Notes						
<input type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony <input checked="" type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other								
Defendant Name (Last, First, Middle) <b>Dicorrado Cindy</b>				Race <b>W</b>	Sex <b>F</b>	Date of Birth <b>05/17/58</b>		
Charge <b>RESIST WITHOUT VIOLENCE</b>		Charge <b>Trespass after Warning</b>						
Charge <b>T</b>								
Victim Name (Last, First, Middle) <b>STATE OF FLORIDA</b>				Race <b>//</b>	Sex <b>//</b>	Date of Birth		
Local Address (Street, Apt. Number)		City <b>BOYNTON BEACH</b>	State <b>FL.</b>	Zip	Phone	Address Source <b>DAVID / DL / VERBAL</b>		
Business Address (Street, Apt. Number)		City	State	Zip	Phone	Occupation		
The undersign swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The person taken into custody...								
<input type="checkbox"/> committed the below acts in my presence.		<input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts.						
<input type="checkbox"/> confessed to admitting to the below facts.		<input checked="" type="checkbox"/> was found to have committed the below acts, resulting from (described) investigation.						
On the <b>30</b> day of <b>MAY</b> 20 <b>20</b> at <b>1400</b> <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM								

On the above date and time I responded to 1941 S Military Trail in reference to a disturbance.

Prior to arrival dispatch advised that security officers stated that two females who were arrested from the day prior were currently on the property again.

Upon arrival I observed three females who were previously trespassed from the property the day prior, standing in front of La Granja on the grass area. The three females identified as Cindy Dicorrado, Linda Ortiz, and Christina Gomez were observed by security officers in the parking lot five minutes prior to deputies arrival. The three females parked Cindy's 2007 Hyundai Santa fe bearing FL tag# [REDACTED] in the parking lot just west of La Granja, then walked eastbound through the property.

I made contact with the three females and spoke to Cindy initially who stated she was aware that she was trespassed from the property the day prior and would remove her vehicle. Cindy advised she was there because her friends, Linda and Christina were arrested the day prior and wanted to hold signs to the public. Cindy was advised that she was under arrest as she was trespassed from the property on 05/29/2020. Upon making contact with Cindy's left wrist, she began to pull away and immediately ran east into oncoming traffic. Lt. Johnson made contact with Cindy and immediately brought her to safety on the sidewalk. Cindy was then directed to the ground, handcuffed to the rear, checked for property lit and tightness and placed in my patrol vehicle.

Deputies attempted to make contact with Linda and Christina at which time the two fled in a green van (bearing FL tag #NMDH46) driving westbound on Forest Hill Blvd. Deputies conducted a traffic stop where Linda and Christina were both identified by D/S Orsino #28991. It should be noted D/S Orsino was an arresting deputy from 05/29/2020. Linda and Christina were handcuffed to the rear and placed in the patrol vehicle.

Cindy later complained of wrist and shoulder pain and was transported to a walk in clinic for medical clearance.

All parties were later transported to the County Jail for Proper Booking.

The foregoing instrument was sworn to and affirmed before me this <b>30</b> day of <b>May</b> 20 <b>20</b> by:	
<b>D/S Orsino #28991</b>	<b>D/S M. CASTEEL 28275</b>
Name of Notary Public / Clerk of Court / Officer (F.S. 117.00)	Name of Arresting/Investigating Officer
Signature of Notary Public / Clerk of Court / Officer (F.S. 117.00)	Signature of Arresting/Investigating Officer
Page <b>1</b> of <b>1</b>	





**Palm Beach County Sheriff's Office – Arrests Only**

	X	Florida State Statute	Description	Page Number(s)
L/E Exemptions	<input type="checkbox"/>	119.071(2)(d)	Surveillance techniques, procedures and personnel; inventory of law enforcement resources, policies or plans pertaining to mobilization deployment or tactical operations.	
	<input type="checkbox"/>	943.053, 943.0525	NCIC/FCIC/FBI and in-state FDLE/DOC.	
	<input type="checkbox"/>	119.071(4)(c)	Undercover personnel.	
	<input type="checkbox"/>	119.071(2)(f)	Confidential informants (CIs).	
	<input type="checkbox"/>	119.071(2)(e)	Confession.	
Public Info. Exemptions	<input type="checkbox"/>	985.04(1)	Juvenile offender records.	
	<input type="checkbox"/>	119.071(h)(i)	Assets of a crime victim.	
	<input type="checkbox"/>	395.3025(7)(a), 456.057(7)(a)	Medical information.	
	<input type="checkbox"/>	394.4615(7)	Mental health information.	
	<input type="checkbox"/>	119.071(4)(d)(2)(a)	Home address, telephone, Social Security number, date of birth, or photos of active/former LE personnel, spouses, and children.	
Florida Rules of Judicial Administration 2.420 (Rule of 23)	<input checked="" type="checkbox"/>	(iii) 119.0714(1)(i)-(j), 2)(a)-(e)	Social Security, bank account, charge, debit, and credit card numbers.	2
	<input type="checkbox"/>	(viii) 394.4615(7)	Clinical records under the Baker Act.	
	<input type="checkbox"/>	(xii) 741.30(3)(b)	The victim's address in a domestic violence action on petitioner's request.	
	<input type="checkbox"/>	(xiii) 119.071(2)(h), 119.0714(1)(h)	Protected information regarding victims of child abuse or sexual offenses.	
	<input type="checkbox"/>			
	<input type="checkbox"/>			
	<input type="checkbox"/>			
	<input type="checkbox"/>			
Other	<input type="checkbox"/>		Other:	
	<input type="checkbox"/>		Other:	

**REVIEW COMPLETED BY**

<b>Booking Number:</b> 2020013858	<b>Date:</b> 05/31/2020
	<b>Specialist Name/ID:</b> AM/31562

**EXHIBIT B**

NOT A CERTIFIED COPY

0516737

21mm 372ASB

2227

OBTS Number		<b>ARREST / NOTICE TO APPEAR</b> Juvenile Referral Report			1. Arrest 2. N.T.A.	3. Request for Warrant 4. Request for Copies	1	Juvenile	N	
Agency ORI Number <b>FLO 500000</b>		Agency Name <b>PALM BEACH COUNTY SHERIFF'S OFFICE</b>			Agency Report Number (N.T.A.'s only) <b>06- 21-025365</b>					
Charge Type: Check as many as apply <input type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony <input checked="" type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other		Weapon Seized / Type <input checked="" type="checkbox"/> 1. Yes <input type="checkbox"/> 2. No		Multiple Clearance Indicator <b>01</b>						
Location of Arrest (Including Name of Business) <b>9795 GLADES ROAD, BOCA RATON FL 33434</b>					Location of Offense (Business Name, Address) <b>9795 GLADES ROAD, BOCA RATON FL 33434</b>					
Date of Arrest <b>01/14/2021</b>	Time of Arrest <b>11:30</b>	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle				
Name (Last, First, Middle) <b>Dicorrado, Cindy, Falco</b>					Alias (Name, DOB, Soc. Sec. #, Etc.)					
Race W - White I - American Indian B - Black O - Oriental/Asian <b>W</b>	Sex <b>F</b>	Date of Birth <b>9/17/1958</b>	Height <b>5'02</b>	Weight <b>100</b>	Eye Color <b>BLUE</b>	Hair Color <b>BRN</b>	Complexion <b>TAN</b>	Build <b>LIGHT</b>		
Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)					Marital Status <b>UNK</b>	Religion <b>UNK</b>	Indication of Alcohol/Drug Influence <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> U			
Local Address (Street, Apt. Number) <b>316 Nw 1st Ave, Boynton Beach, FL 33435</b>		(City)	(State)	(Zip)	Phone		Residence Type: <input type="checkbox"/> 1. City <input type="checkbox"/> 2. County <input type="checkbox"/> 3. Florida <input type="checkbox"/> 4. Out of State <b>2</b>			
Permanent Address (Street, Apt. Number)		(City)	(State)	(Zip)	Phone		Address Source <b>FL-DL</b>			
Business Address (Name, Street)		(City)	(State)	(Zip)	Phone		Occupation <b>UNK</b>			
DL Number, State <b>FL</b>	Soc. Sec. Number		INS Number		Place of Birth (City, State) <b>FL</b>		Citizenship <b>FL</b>			
Co-Defendant Name (Last, First, Middle)		Race	Sex	Date of Birth	<input type="checkbox"/> 1. Arrested <input type="checkbox"/> 2. At Large		<input type="checkbox"/> 3. Felony <input type="checkbox"/> 4. Misdemeanor <input type="checkbox"/> 5. Juvenile			
Co-Defendant Name (Last, First, Middle)		Race	Sex	Date of Birth	<input type="checkbox"/> 1. Arrested <input type="checkbox"/> 2. At Large		<input type="checkbox"/> 3. Felony <input type="checkbox"/> 4. Misdemeanor <input type="checkbox"/> 5. Juvenile			
Parent Name (Last)		(First)	(Middle)	(Address)	Residence Phone		Business Phone			
Address (Street, Apt. Number)		(City)	(State)	(Zip)	Phone		Phone			
Notified by: (Name)		Date	Time	Juvenile Disposition Handled/processed within Dept. and Released.		2. TOT HRS / DYS 3. Incarcerated				
Released To: (Name)		Relationship		Date	Time					
The above address provided by <input type="checkbox"/> defendant or <input type="checkbox"/> dependent's parents. The child and / or parent was told to keep the Juvenile Court Clerk (Phone 385-2528) informed by change of address. <input type="checkbox"/> Yes, by: (Name) <input type="checkbox"/> No (Reason)					School Attended		Grade			
Property Crime? <input type="checkbox"/> Yes <input type="checkbox"/> No		Description of Property			Value of Property					
Drug Activity S. Sell N. N/A P. Possess		R. Struggle D. Deliver E. Use	K. Dispense/ Distribute	M. Manufacture/ Produce/ Cultivate	Z. Other	Drug Type H. N/A A. Amphetamine	B. Barbiturate C. Cocaine E. Heroin	H. Hallucinogen M. Marijuana O. Opium/Opiv.	P. Paraphernalia/ Equipment S. Synthetics	U. Unknown Z. Other
Charge Description <b>TRESPASSING AFTER WARNIG</b>		Courts <b>1</b>	Domestic Violence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Statute Violation Number <b>810.09(2)(B)</b>		Violation of ORD #				
Drug Activity <b>N/A</b>	Drug Type <b>N/A</b>	Amount / Unit	Offense # <b>21-025365</b>	Warrant / Copies Number		Bond				
Charge Description <b>RESISTING WITHOUT VIOLENCE</b>		Courts <b>1</b>	Domestic Violence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Statute Violation Number <b>843.02</b>		Violation of ORD #				
Drug Activity <b>N/A</b>	Drug Type <b>N/A</b>	Amount / Unit	Offense #	Warrant / Copies Number		Bond				
Charge Description		Courts	Domestic Violence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Statute Violation Number		Violation of ORD #				
Drug Activity <b>N/A</b>	Drug Type <b>N/A</b>	Amount / Unit	Offense #	Warrant / Copies Number		Bond				
Charge Description		Courts	Domestic Violence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Statute Violation Number		Violation of ORD #				
Drug Activity <b>N/A</b>	Drug Type <b>N/A</b>	Amount / Unit	Offense #	Warrant / Copies Number		Bond				
Location (Court, Room Number, Address) <b>South County Courthouse, Courtroom #1, 200 W. Atlantic Ave., Delray Beach, FL 33444 - Ph: (561) 352-2996</b>										
Court Date and Time Month <b>FEB</b> Day <b>THUR 18TH</b> Year <b>2021</b> Time <b>8:00</b>										
I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS NOTICE TO APPEAR, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED										
Signature of Defendant (or Juvenile and Parent /Custodian)					Date Signed <b>01/14/2021</b>					
HOLD for other Agency Name:		Signature of Arresting Officer			Name Verification (Printed by Arrestee)					
<input type="checkbox"/> Dangerous <input type="checkbox"/> Suicidal <input type="checkbox"/> Reested Arrest <input type="checkbox"/> Other:		Name of Arresting Officer (Print) <b>D/S R. ORAGENE</b>			(PRINT)					
I.D. #		I.D. # <b>7160</b>			PAGE					
Transporting Officer <b>R. MASS</b>		I.D. # <b>9195</b>			Agency <b>PBSO</b>					
Witness here if subject signed with an "X"										

DISTRIBUTION: WHITE - COURT COPY GREEN - STATE ATTORNEY YELLOW - AGENCY PINK - AGENCY (N.T.A.'s ONLY)

SCANNED  
JAN 15 2021

FILED  
JAN 15 2021  
AM  
JOSEPH ABRUZZO, CLERK  
PALM BEACH CO. FL

OBTS Number		<b>PROBABLE CAUSE AFFIDAVIT</b>		1. Arrest 2. N.T.A.	3. Request for Warrant 4. Request for Captives	1	Juvenile	N	
ADMIN	Agency ORI Number <b>FLO 500000</b>	Agency Name <b>PALM BEACH COUNTY SHERIFF'S OFFICE</b>	Agency Report Number <b>06- 21-025365</b>						
	Charge Type: Check as many as apply.		Special Notes:						
CHARGES	Name (Last, First, Middle) <b>Dicorrado, Cindy, Falco</b>		Alias	Race W	Sex F	Date of Birth 9/17/1958			
	Charge Description <b>TRESPASSING AFTER WARNIG</b>	<b>810.09(2)(B)</b>	Charge Description <b>RESISTING WITHOUT VIOLENCE</b>	<b>843.02</b>					
VICTIM	Victim's Name (Last, First, Middle) <b>Einstein Bagel, Einstein Bagel,</b>		Race	Sex	Date of Birth				
	Local Address (Street, Apt. Number) <b>9795 Glades road, Boca Raton FL 33434</b>		(City)	(State)	(zip)	Phone <b>( 561 ) 477-0667</b>	Address Source		
	Business Address (Name, Street)		(City)	(State)	(zip)	Phone	Occupation		
<p>The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody</p> <p><input checked="" type="checkbox"/> committed the below acts in my presence.      <input type="checkbox"/> was observed by _____ who told _____ that he/she saw the arrested person commit the below acts. <input type="checkbox"/> confessed to _____ admitting to the below facts.      <input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.</p> <p>On the <u>14th</u> day of <u>January</u> 20<u>21</u> at <u>1114</u> <input checked="" type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest.)</p> <p><b>On 1/14/2021 at approximately 11:14 hours, I was dispatch to Einstein Bagel located at 9795 Glades Road in unincorporated Boca Raton FL, in reference to trespassing. Complainant Ann Marie Campian who is the manager at Einstein Bagel told Palm Beach County Sheriff Office dispatch, that a white female customer is in the store causing a disturbance because she was asked to wear a mask and refused to leave the store after several requests. Upon arrival, I met with the store manager Anne Marie Campian outside the store, she told me the female was still in the store causing a scene and she wants her removed. I entered the store I noticed the white female who was later identified through her Florida Driver's license as Cindy Falco Dicorrado standing in front of the counter screaming loudly at customers and employees saying "you are violating my rights" " you are violating the constitutions" " I am not leaving that's discrimination" I approached defendant Cindy Falco Dicorrado and I calmly asked her to step out of the store so I can speak to her, at that point defendant Cindy Falco Dicorrado told me that she was not going outside and she is not wearing a mask because that's her right to refuse to wear a mask, she then proceeded quote Constitution codes and discrimination statutes. I explained to Cindy Falco Dicorrado that the store manager wanted her out of the store if she wasn't going to comply at that point she continues to scream at me and told a younger black female to record the interaction, after several attempts to speak with Cindy Falco Dicorrado failed. Einstein Bagel manager Ann Marie Campian in my presence asked defendant Cindy Falco Dicorrado to leave the store and that she is trespassing. I told defendant Cindy Falco Dicorrado she has to leave or she will be arrested for trespassing. Defendant Cindy Falco Dicorrado told me no she's not leaving that I am violating her rights, at that point with my left hand I grabbed her gently by her left wrist, she pulled back and refused to obey my verbal command to stop resisting. D/S Moss Came on the scene grabbed her other arm and assisted me in escorting her out and handcuffs her. Based on my investigation it was determined an act of trespassing after warning was committed per fss 810.09(2)(B) and resisting without violence per fss 843.02.</b></p>									
ADMINISTRATIVE	STATE OF FLORIDA COUNTY OF PALM BEACH		Signature of Arresting Investigative Officer <b>D/S R. ORAGENE 7760</b>						
	The foregoing instrument was sworn to or affirmed and subscribed before me this <u>14th</u> day of <u>January</u> 20 <u>21</u> by <u>R. Oragene</u>		Signature of Notary Public <b>R. oragene</b>						
	(Print name of Arresting Investigative Officer), who is personally known to me and/or produced identification. Type of identification produced		<b>D/S Moss 9195 K. Moss</b>						
Notary Public, Clerk of Court, Officer (F.S.S. 117.10)		PAGE <u>1</u> OF <u>1</u>							



**Palm Beach County Sheriff's Office – Arrests Only**

	X	Florida State Statute	Description	Page Number(s)
L/E Exemptions	<input type="checkbox"/>	119.071(2)(d)	Surveillance techniques, procedures and personnel; inventory of law enforcement resources, policies or plans pertaining to mobilization deployment or tactical operations.	
	<input type="checkbox"/>	943.053, 943.0525	NCIC/FCIC/FBI and in-state FDLE/DOC.	
	<input type="checkbox"/>	119.071(4)(c)	Undercover personnel.	
	<input type="checkbox"/>	119.071(2)(f)	Confidential informants (CIs).	
	<input type="checkbox"/>	119.071(2)(e)	Confession.	
Public Info. Exemptions	<input type="checkbox"/>	985.04(1)	Juvenile offender records.	
	<input type="checkbox"/>	119.071(h)(i)	Assets of a crime victim.	
	<input type="checkbox"/>	395.3025(7)(a), 456.057(7)(a)	Medical information.	
	<input type="checkbox"/>	394.4615(7)	Mental health information.	
	<input type="checkbox"/>	119.071(4)(d)(2)(a)	Home address, telephone, Social Security number, date of birth, or photos of active/former LE personnel, spouses, and children.	
Florida Rules of Judicial Administration 2.420 (Rule of 23)	<input checked="" type="checkbox"/>	(iii) 119.0714(1)(i)-(j), (2)(a)-(e)	Social Security, bank account, charge, debit, and credit card numbers.	2
	<input type="checkbox"/>	(viii) 394.4615(7)	Clinical records under the Baker Act.	
	<input type="checkbox"/>	(xii) 741.30(3)(b)	The victim's address in a domestic violence action on petitioner's request.	
	<input type="checkbox"/>	(xiii) 119.071(2)(h), 119.0714(1)(h)	Protected information regarding victims of child abuse or sexual offenses.	
	<input type="checkbox"/>			
	<input type="checkbox"/>			
	<input type="checkbox"/>			
	<input type="checkbox"/>			
Other	<input type="checkbox"/>		Other:	
	<input type="checkbox"/>		Other:	

**REVIEW COMPLETED BY**

Booking Number: 2021001123	Date: 01/15/2021
	Specialist Name/ID: T Howard/7185

**EXHIBIT C**

NOT A CERTIFIED COPY

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

CASE NO. 2020MM004494AMB DIVISION: "L"

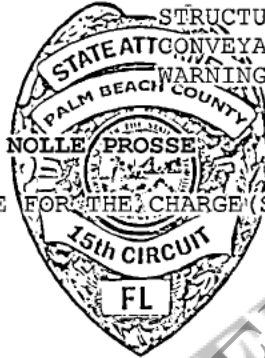
STATE OF FLORIDA

vs.  
CINDY  
DICORRADO, W/F, 09/17/1958

Defendant.

CHARGE(S) :

RESIST OFFICER  
WITHOUT VIOLENCE;  
TRESPASS PROPERTY  
OTHER THAN A  
STRUCTURE OR  
CONVEYANCE AFTER  
WARNING



ALTHOUGH THERE WAS PROBABLE CAUSE FOR THE CHARGE(S) THE CASE IS NOLLE  
PROSSED FOR FOLLOWING REASON(S) :

- |   |     |  |
|---|-----|--|
| <input type="checkbox"/> Officer(s) _____             | FTA | <input type="checkbox"/> Court would not continue              |
| <input type="checkbox"/> Witness(es) _____            | FTA | <input type="checkbox"/> Breath Testing Technician FTA         |
| <input type="checkbox"/> Victim _____                 | FTA | <input type="checkbox"/> Re-Filed as a Felony                  |
| <input type="checkbox"/> Unable to Locate Witness(es) |     | <input type="checkbox"/> Duplicate Charge Filed                |
| <input type="checkbox"/> Defendant/Witness Deceased   |     | <input type="checkbox"/> Age of Case                           |
| <input type="checkbox"/> Evidence Suppressed          |     | <input type="checkbox"/> Wrong Defendant Charged               |
| <input type="checkbox"/> Plea Negotiation             |     | <input checked="" type="checkbox"/> Insufficient Evidence – PC |
| <input type="checkbox"/> Other (Explanation Below)    |     | <input type="checkbox"/> Insufficient Evidence – NO PC         |

Other: \_\_\_\_\_

DATE: April 12, 2021

DAVID ARONBERG  
STATE ATTORNEY

/s/ *Jeremiah Romano*

By: RODNEY JEREMIAH M ROMANO  
Assistant State Attorney  
Florida Bar No. 1025652  
E-Service E-Mail: CCDIVL@SA15.ORG

Clerk and Sheriff to Rescind No Contact Order

**EXHIBIT D**

NOT A CERTIFIED COPY



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

CASE NO: 2021MM000372ASB  
DIV: L  
OBTS NUMBER:

STATE OF FLORIDA

v.  
DEFENDANT, Cindy Dicorrado

9/17/1958                      W                      F                      [REDACTED]  
D.O.B.                              RACE                      GENDER                      SOCIAL SECURITY NUMBER

[ ] PROBATION VIOLATOR [ ] COMMUNITY CONTROL VIOLATOR [ ] RETRIAL [ ] RESENTENCE

**JUDGMENT**

The above defendant, being personally before this Court represented by Pro SE L (attorney)

<input type="checkbox"/> Having entered a plea of guilty to the following crime(s):	<input type="checkbox"/> Having entered a plea of nolo contendere to the following crime(s):	<input checked="" type="checkbox"/> Having been tried and found guilty of the following crime(s):	<input type="checkbox"/> Having been tried and found not guilty of the following crime(s):
---	--	---	--

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGR
1	Trespass A/W	810.09(1)(a)(2)(a)(2)(b)	M1
2	RWV	843.02	M1

[ ] and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the defendant is hereby ADJUDICATED GUILTY of the above crime(s).

[ ] and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty, regardless of adjudication, to attempts or offenses in violation of the following Florida Statute sections – § 784.048; § 810.14; § 847.011; § 847.013; § 847.013; § 847.0135; § 877.26 – and/or offenses found to have been committed for the purpose of benefiting, promoting, or furthering criminal gang interests [as defined in F.S. §§ 874.03, 874.04], and/or any other offenses specified in F.S. § 943.325, the Defendant shall be required to submit DNA samples.

N and good cause being shown: IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD.

The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal with the Clerk of Court within thirty days following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency.

[ ] and no cause having been shown why the trial verdict should not be upheld, it is ORDERED that the Defendant is hereby ADJUDICATED NOT GUILTY of the above crime(s).

amm  
DONE AND ORDERED in Open Court at Palm Beach County, Florida, this \_\_\_\_\_ day of \_\_\_\_\_, 2022.  
COUNTY COURT JUDGE

20<sup>th</sup> Feb, 2022

SCANNED  
MAR 02 2022

FILED  
MAR 01 2022

JOSEPH ABRUZZO, CLERK  
PALM BEACH COUNTY, FL  
COUNTY CRIMINAL

111