

Affidavit in Support of Warrant

Your Affiant, Special Agent Raul Perez, has been a sworn police officer for over twenty-two years. Your affiant has conducted hundreds of criminal investigations and is currently assigned to the Florida Department of Law Enforcement Public Integrity Squad. Your affiant was assigned to a criminal investigation of voter fraud in a City of Hialeah Gardens elections. As a result of this investigation, your affiant has actual, relayed or constructive knowledge of the following:

On August 26, 1999, September 28, 1999, and December 2, 1999, Robert Godwin (Date of Birth _____), pursuant to a subpoena, responded to the Miami-Dade County State Attorney's Office and met with your Affiant, Special Agent Gale Sampson and Assistant State Attorney Joseph Centorino.

Godwin stated that in 1996 he was employed by the City of Hialeah Gardens as a Council Assistant and was living in Hialeah. Godwin stated that in 1996 he was approached by Hialeah Gardens Mayor Gilda Cabrera Oliveros, who asked him to change his voting address so that he could vote in the 1997 municipal election in Hialeah Gardens. Mayor Oliveros persuaded Godwin to do it, and provided Godwin with a Department of Elections Change of Address form. Godwin stated that he filled out the form and returned the completed form to Oliveros. On the form Godwin changed his voting address from 73 East 53 Terrace Hialeah (his mother's address and the address used by Godwin as his mailing and voting address) to 8751 NW 110 Lane, Hialeah Gardens, FL, and swore under oath that he lived at the latter address. In fact, Godwin was residing at that time at 6515 W. 24th Avenue, #201, Hialeah, FL.

The address of 8751 NW 110 Lane, Hialeah Gardens, FL is that of the (then) Hialeah Gardens Parks Director, Ricardo Vasquez. (Vasquez is a neighbor of Oliveros). Godwin stated that at no time has he ever lived at 8751 NW 110 Lane.

Department of Elections records indicate that a change of address from 73 East 53 Terrace to 8751 NW 110 Lane took place in April 1996 for Robert Scott Godwin, Voters Registration number #_____.

Department of Elections records reflect that Robert Godwin voted in a March 4, 1997, Hialeah Gardens election from his registered address of 8751 NW 110 Lane, Hialeah Gardens, FL, with a voter's registration number of _____. Godwin changed his address once again in September 1997, back to his former address of 73 East 53 Terrace, Hialeah, FL.

On September 30, 1999, Ricardo Vasquez (Date of Birth _____), pursuant to a subpoena, responded to the Miami-Dade County State Attorney's Office and gave a sworn statement to your affiant, Special Agent Gale Sampson, and Assistant State Attorney Joseph Centorino.

Vasquez stated that sometime in 1996, Mayor Oliveros approached him and stated that he would be receiving some mail for Robert Godwin at his home. Vasquez resides at 8751 NW 110 Lane Hialeah Gardens, FL and is a neighbor of Oliveros. Vasquez stated that at no time has Godwin resided at his home. Vasquez was aware that Godwin was an employee of the City of Hialeah Gardens. Mayor Oliveros told Vasquez that when he received the mail addressed to Godwin he should deliver it to her. When a letter arrived addressed to Godwin from the Department of Elections, which appeared to be a voters registration card, he contacted Oliveros and she immediately came over to his house. Vasquez said that he turned the letter over to Oliveros, and that Oliveros had remarked, "This is what I've been waiting for." Vasquez stated that he expressed concern over this matter to Oliveros, and was told by her, "not to worry about it."

Godwin stated that Oliveros hand-delivered to him his voters registration card showing the address change to 8751 NW 110 Lane, Hialeah Gardens.

Both Godwin and Vasquez stated that they had been fired by Mayor Oliveros.

On October 20, 1999, and October 27, 1999, your affiant and Special Agent Gale Sampson interviewed two close neighbors of Ricardo Vasquez, Adalberto Pena and Ingrid Hernandez, who indicated that they were very familiar with the members of the Vasquez household and have never heard of or seen an individual named Robert Godwin at the residence.

Based upon the foregoing, there is probable cause to believe that Gilda Cabrera Oliveros has committed the crime of Fraud In Connection With Casting Vote in violation of F.S. 104.041, False Swearing in an Election in violation of F.S. 104.011 and Conspiracy to Commit Fraud in Connection With Casting Vote, in violation of F.S. 777.04.

Affiant/Raul E. Perez/Special Agent FDLE

Sworn to and subscribed before me, this ____ day of _____, 1999

Circuit/County Judge
Eleventh Judicial Circuit of Florida