# IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

# STATE OF FLORIDA, Plaintiff,

vs.		CASE NO. CRC 98-06727-CFANO-A
		OSWP NO. 98-0151-WFB
BRUCE CASNER	(A)	
ROBERT FISHER	<b>(B)</b>	
SALVADOR GINABREDA	<b>(C)</b>	<b>INFORMATION FOR:</b>
JON HERLONG	<b>(D)</b>	
WILFREDO JIMINEZ	<b>(E)</b>	COUNT 1: RACKETEERING,
RAYMOND ROGERS	<b>(F)</b>	F.S. 895.03(3)
BRIAN SHEPARD	<b>(G)</b>	First Degree Felony
BRUCE SHEPARD	<b>(H)</b>	(Defendants A,B,C,D,E,F,G,H,I)
JERRY TANNER	(I)	
ANTHONY HORNBECK	$(\mathbf{J})$	<b>COUNT 2: CONSPIRACY TO</b>
ANTHONY MATHEWS	<b>(K)</b>	COMMIT RACKETEERING,
SONNY PIERCE	<b>(L)</b>	F.S. 895.03(4)
RICHARD SPATZ	$(\mathbf{M})$	First Degree Felony
JAMES TIMPONE	(N)	(Defendants A,B,C,D,E,F,G,H,I)
MICHAEL VINCELLI	<b>(O)</b>	
ERIC VANDENBROEK	<b>(P</b> )	<b>COUNT 3: GRAND THEFT,</b>
MARK CERQUEIRA	( <b>Q</b> )	F.S. 812.014
MARK DAVID	$(\mathbf{R})$	Third Degree Felony
MARCO DIAZ	<b>(S)</b>	(Defendants K, M)
JEFFERY HAMMER	<b>(T)</b>	
LARRY LEDFORD	<b>(U)</b>	<b>COUNT 4: DEALING IN</b>
ANTHONY LINDNER	<b>(V)</b>	STOLEN PROPERTY,
MICHAEL McDONALD	<b>(W</b> )	F.S. 812.019
JOSHUA MILLER	<b>(X)</b>	Second Degree Felony
TYLER NUSBAUM	<b>(Y)</b>	(Defendants K, M)
DOUGLAS RYDER	<b>(Z)</b>	
STANLEY TURNER	(AA)	<b>COUNT 5: GRAND THEFT,</b>
Defendants.		F.S. 812.014
		Third Degree Felony
		(Defendant C)

COUNT 6: DEALING IN STOLEN PROPERTY, F. S. 812.019

**Second Degree Felony** 

(Defendant C)

(Defendant C)

COUNT 7: POSSESSION OF A
MOTOR VEHICLE WITH AN
ALTERED VIN,
F. S. 319.33(1)(d)
Third Degree Felony

COUNT 8: GRAND THEFT, F. S. 812.014 Third Degree Felony (Defendant AA)

COUNT 9: BURGLARY OF A CONVEYANCE, F. S. 810.02 Third Degree Felony (Defendant AA)

COUNT 10: CRIMINAL MISCHIEF, F. S. 806.13(1)(a)(b)1 First Degree Misdemeanor (Defendant AA)

COUNT 11: GRAND THEFT, F. S. 812.014 Third Degree Felony (Defendants C, J)

COUNT 12: GRAND THEFT, F. S. 812.014 Third Degree Felony (Defendant E) COUNT 13: DEALING IN STOLEN PROPERTY, F. S. 812.019 Second Degree Felony (Defendant E)

COUNT 14: GRAND THEFT, F. S. 812.014 Third Degree Felony (Defendants C, P, W)

COUNT 15: DEALING IN STOLEN PROPERTY, F. S. 812.019 Second Degree Felony (Defendants C, K, P)

COUNT 16: POSSESSION OF A
MOTOR VEHICLE WITH AN
ALTERED VIN,
F. S. 319.33(1)(d)
Third Degree Felony
(Defendant C)

COUNT 17: INSURANCE FRAUD, F. S. 817.234(1)(a)
Third Degree Felony
(Defendants K, W)

COUNT 18: FALSE REPORT TO A LAW ENFORCEMENT OFFICER, F. S. 837. 05(1) First Degree Misdemeanor (Defendant W)

COUNT 19: GRAND THEFT, F. S. 812.014 Third Degree Felony (Defendants C, R)

COUNT 27: DEALING IN STOLEN PROPERTY, F. S. 812.019

**Second Degree Felony** 

(Defendant E)

COUNT 20: DEALING IN STOLEN PROPERTY,

F. S. 812.019

**Second Degree Felony** 

(Defendant C)

**COUNT 28: GRAND THEFT,** 

F. S. 812.014

**Third Degree Felony** 

(Defendant E )

**COUNT 21: GRAND THEFT,** 

F. S. 812.014

Third Degree Felony (Defendants B, K, T)

COUNT 29: DEALING IN STOLEN PROPERTY,

F. S. 812.019 (Defendant E )

**Second Degree Felony** 

COUNT 22: DEALING IN STOLEN PROPERTY,

F. S. 812.019

Second Degree Felony (Defendants B, K, T)

**COUNT 30: GRAND THEFT,** 

F. S. 812.014

**Third Degree Felony** 

(Defendant E)

**COUNT 23: INSURANCE FRAUD,** 

F. S. 817.234(1)(a) Third Degree Felony (Defendants K,T) **COUNT 31: GRAND THEFT,** 

F. S. 812.014

**Third Degree Felony** 

(**Defendant E** )

**COUNT 24: GRAND THEFT,** 

F. S. 812.014

Third Degree Felony (Defendants E, F, H)

**COUNT 32: GRAND THEFT,** 

F. S. 812.014

**Third Degree Felony** 

(Defendant E )

**COUNT 25: GRAND THEFT,** 

F. S. 812.014

Third Degree Felony (Defendants F, H)

COUNT 33: DEALING IN STOLEN PROPERTY,

F. S. 812.019Second Degree Felony

(Defendant E )

**COUNT 26: GRAND THEFT,** 

F. S. 812.014

**Third Degree Felony** 

(Defendant E)

**COUNT 34: GRAND THEFT,** 

F. S. 812.014

**Third Degree Felony** 

(Defendant E)

COUNT 35: DEALING IN STOLEN PROPERTY, F. S. 812.019 Second Degree Felony (Defendant E)

COUNT 36: GRAND THEFT, F. S. 812.014
Third Degree Felony
(Defendants E and F)

COUNT 37: DEALING IN STOLEN PROPERTY, F. S. 812.019 Second Degree Felony (Defendants E and F)

COUNT 38: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, E, Y, AA)

COUNT 39: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants D, E, AA)

COUNT 40: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, E, Y)

COUNT 41: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, F,Y)

**COUNT 42: GRAND THEFT, F.S. 812.014** 

Third Degree Felony (Defendants D, F, Y)

COUNT 43: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendant F)

COUNT 44: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants B, D,F)

COUNT 45: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendant B, D, F)

COUNT 46: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, F, G)

COUNT 47: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants D, F, G)

COUNT 48: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, Y, F, G)

COUNT 49: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, Y, F, G) COUNT 50: GRAND THEFT,

F.S. 812.014

**Third Degree Felony** 

(Defendants F)

COUNT 51: DEALING IN STOLEN PROPERTY,

F.S. 812.019

**Second Degree Felony** 

(Defendant F)

**COUNT 52: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants D, G)

**COUNT 53: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants F, G, H)

**COUNT 54: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants D, E, AA)

**COUNT 55: DEALING IN** 

STOLEN PROPERTY,

F.S. 812.019

**Second Degree Felony** 

(Defendants D, E, AA)

**COUNT 56: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony

(Defendants F, G)

**COUNT 57: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony

(Defendants F, G)

**COUNT 58: BURGLARY OF** 

A STRUCTURE,

**F.S.** ?

**Third Degree Felony** 

(Defendants F, G)

**COUNT 59: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony

(Defendants F, G)

**COUNT 60: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants F, H)

**COUNT 61: DEALING IN** 

STOLEN PROPERTY,

F.S. 812.019

**Second Degree Felony** 

(Defendants F, H)

**COUNT 62: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants E, F)

**COUNT 63: DEALING IN** 

STOLEN PROPERTY,

F.S. 812.019

**Second Degree Felony** 

(Defendants E, F)

**COUNT 64: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants A, C, D, I, Y)

**COUNT 65: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants C, R, Z)

COUNT 66: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants C, R, Z)

COUNT 67: POSSESSION OF MOTOR VEHICLE WITH ALTERED VIN, F.S. 319.33(1)(d) Third Degree Felony (Defendant Z)

COUNT 68: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, Y)

COUNT 69: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants E, F)

COUNT 70: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants E, F)

COUNT 71: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, K, M, Y) COUNT 72: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants D, K, M)

COUNT 73: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants F)

COUNT 74: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants E, F)

COUNT 75: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants A, D, I, Y)

COUNT 76: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants A, D, I)

COUNT 77: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, E)

COUNT 78: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants D, E)

COUNT 79: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants C, D, Y)

COUNT 80: GRAND THEFT, F.S. 812.014 Third Degree Felony

(Defendants C, D, Y)

**COUNT 81: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants C, D, M, Y)

COUNT 82: DEALING IN STOLEN PROPERTY,

F.S. 812.019

Second Degree Felony (Defendants C, M)

**COUNT 83: POSSESSION OF** 

A MOTOR VEHICLE WITH

AN ALTERED VIN, F.S. 319.33(1)(d)

**Third Degree Felony** 

(Defendant C)

**COUNT 84: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants E, F, AA)

COUNT 85: DEALING IN STOLEN PROPERTY,

F.S. 812.019

**Second Degree Felony** 

(Defendants E, F, AA)

**COUNT 86: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants B, D, U, Y)

COUNT 87: DEALING IN STOLEN PROPERTY,

F.S. 812.019

Second Degree Felony (Defendants B, D, U)

**COUNT 88: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants B, D, U, Y)

**COUNT 89: DEALING IN** 

STOLEN PROPERTY,

F.S. 812.019

Second Degree Felony (Defendants B, D, U)

**COUNT 90: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants E, F, S)

**COUNT 91: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants E, F, S)

**COUNT 92: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants E, F, S)

**COUNT 93: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants E, F, M)

**COUNT 94: DEALING IN** 

STOLEN PROPERTY, F.S. 812.019 Second Degree Felony

(Defendants E, F, M)

COUNT 95: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants B, D, I, U, X)

COUNT 96: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants B, D, I, U, X)

COUNT 97: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants A, F)

COUNT 98: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendant A, F)

COUNT 99: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, I)

COUNT 100: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants B, E, F, G, H, S)

COUNT 101: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants B, E, F, G, H, S)

COUNT 102: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, I)

COUNT 103: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants B, C, D, I)

COUNT 104: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants B, C)

COUNT 105: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants B, D, I)

COUNT 106: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants B, D, I)

COUNT 107: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, I, Y)

COUNT 108: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, I, Y)

**COUNT 109: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants D, I, Y)

**COUNT 110: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony (Defendants B, D, I, Y)

COUNT 111: DEALING IN STOLEN PROPERTY,

F.S. 812.019

**Second Degree Felony** 

(Defendants B, D, I)

**COUNT 112: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants B, D, I)

COUNT 113: DEALING IN STOLEN PROPERTY,

F.S. 812.019

Second Degree Felony (Defendants B, D, I)

**COUNT 114: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants D, Y, Z)

COUNT 115: DEALING IN STOLEN PROPERTY,

F.S. 812.019

**Second Degree Felony** 

(Defendants D, Z)

**COUNT 116: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants C, D, O, Y)

COUNT 117: DEALING IN

STOLEN PROPERTY,

F.S. 812.019 Second Degree Felony

(Defendants C, O)

**COUNT 118: POSSESSION OF** 

A MOTOR VEHICLE WITH

AN ALTERED VIN,

F.S. 319.33(1)(d) Third Degree Felony

(**Defendant C**)

**COUNT 119: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants D, Y)

**COUNT 120: DEALING IN** 

STOLEN PROPERTY,

F.S. 812.019

**Second Degree Felony** 

(Defendants D)

**COUNT 121: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants D, I, Y)

**COUNT 122: GRAND THEFT,** 

F.S. 812.014

Third Degree Felony

(Defendants D, I, Y)

COUNT 123: DEALING IN STOLEN PROPERTY,

STOLENTROLERI

F.S. 812.019

**Second Degree Felony** 

(Defendants D, I) F.S. 812.014 Third Degree Felony (Defendants D, I, V) **COUNT 124: GRAND THEFT,** F.S. 812.014 **Third Degree Felony COUNT 132: GRAND THEFT,** (Defendants D, L) F.S. 812.014 **Third Degree Felony** (Defendants D, I, V) **COUNT 125: DEALING IN** STOLEN PROPERTY, **COUNT 133: POSSESSION OF** F.S. 812.019 **Second Degree Felony** A MOTOR VEHICLE WITH (Defendants D, L) AN ALTERED VIN, F.S. 319.33(1)(d) **COUNT 126: GRAND THEFT, Third Degree Felony** (Defendant I) F.S. 812.014 **Third Degree Felony** (Defendants D, I, N, Y) **COUNT 134: GRAND THEFT,** F.S. 812.014 **COUNT 127: DEALING IN Third Degree Felony** STOLEN PROPERTY, (Defendants B, D, I, U) F.S. 812.019 **Second Degree Felony COUNT 135: DEALING IN** (Defendants D, I, N) STOLEN PROPERTY, F.S. 812.019 **COUNT 128: GRAND THEFT, Second Degree Felony** F.S. 812.014 (Defendants B, D) **Third Degree Felony** (Defendants A, F, H) **COUNT 136: GRAND THEFT,** F.S. 812.014 **Third Degree Felony COUNT 129: DEALING IN** STOLEN PROPERTY, (Defendants B, D, I, Y) F.S. 812.019 **Second Degree Felony COUNT 137: DEALING IN** (Defendants A, F, H) STOLEN PROPERTY, F.S. 812.019 **COUNT 130: GRAND THEFT, Second Degree Felony** F.S. 812.014 (Defendants B, D, I) **Third Degree Felony** 

**COUNT 138: GRAND THEFT,** 

F.S. 812.014

**Third Degree Felony** 

(Defendants D, I, V)

**COUNT 131: GRAND THEFT,** 

(Defendants D, I)

COUNT 139: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants D, I)

COUNT 140: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants F, G)

COUNT 141: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants F, G)

COUNT 142: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants A, D)

COUNT 143: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants A, D)

COUNT 144: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants A, G)

COUNT 145: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants A, G) COUNT 146: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants A, G, H)

COUNT 147: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants A, G, H)

COUNT 148: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants A, B, G, H)

COUNT 149: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants A, B, G, H)

COUNT 150: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants E, F, G, H)

COUNT 151: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants E, F, G, H)

COUNT 152: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants G, H)

COUNT 153: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants G, H)

COUNT 154: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants D, I)

COUNT 155: BURGLARY OF A CONVEYANCE, F.S. ? (Defendants D, I)

COUNT 156: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants A, B, D, I, Y)

COUNT 157: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants A, B, D, I)

COUNT 158: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendant E)

COUNT 159: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendant E)

COUNT 160: GRAND THEFT, F.S. 812.014 Third Degree Felony

(Defendants Q, R, )

**COUNT 161: DEALING IN** 

STOLEN PROPERTY, F.S. 812.019 Second Degree Felony

(Defendants D, I)

COUNT 162: POSSESSION OF A MOTOR VEHICLE WITH AN ALTERED VIN F.S. 319.33(1)(d)

COUNT 163: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants E)

COUNT 164: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendants E)

COUNT 165: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendant E)

COUNT 166: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendant E)

COUNT 167: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendants E) COUNT 168: DEALING IN STOLEN PROPERTY, F.S. 812.019 Second Degree Felony (Defendant E) COUNT 169: GRAND THEFT, F.S. 812.014 Third Degree Felony (Defendant E)

#### IN THE NAME OF AND BY THE AUTHORITY OF THE STATE OF FLORIDA:

#### COUNT 1

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that between August 19, 1994 and July 10, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh, Eighth, Ninth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia, Alachua, Orange, Osceola, Manatee, Sarasota and Hillsborough Counties, BRUCE CASNER, ROBERT FISHER, SALVADOR GINABREDA, JON HERLONG, WILFREDO JIMENEZ, RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD, JERRY TANNER and others known and unknown, did while employed by or associated with an enterprise, as defined in Florida Statutes 895.02(3), to wit: a group of individuals associated in fact although not a legal entity, whether illicit or licit, consisting of BRUCE CASNER, ROBERT FISHER, SALVADOR GINABREDA, JON HERLONG, WILFREDO JIMENEZ, RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD, JERRY TANNER, Anthony Hornbeck, Anthony Mathews, Sonny Pierce, Richard Spatz, Joseph Timpone, Michael Vincelli, Eric Vandenbroek, Mark Cequeria, Mark David, Marco Diaz, Jeffrey Hammer, Larry Ledford, Anthony Lindner, Michael McDonald, Joshua Miller, Tyler Nusbaum, Douglas Ryder, Stanley Turner and others known and known, conduct or participate, directly or indirectly, in such enterprise, through a continuous pattern of racketeering activity, as defined in Florida Statutes Section(s) 895.02(4), by engaging in at least two incidents of racketeering conduct which had similar intents, results, accomplices, victims, or methods of commission, or were otherwise related by distinguishing characteristics and were not isolated incidents, including at least two of the following:

# PREDICATE INCIDENT 1

ANTHONY MATHEWS, RICHARD SPATZ and others known and unknown, on or about August 19, 1994 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Rodney Miller, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 2

**ANTHONYMATHEWS, RICHARD SPATZ**, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Suzuki GSXR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 3

SALVADOR GINABREDA and others known and unknown, on or about March 11, 1995 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Jason Sauser, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 4

**SALVADOR GINABREDA** and others known and unknown, on or about March 11, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or

more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Honda CBR900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 5**

STANLEY TURNER and others known and unknown, on or about September 14, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 GMC Safari Van, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: National Car Rental, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 6

STANLEYTURNER and otthers known and unknown, on or about September 14, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, entered or remained in a conveyance owned by or in the possession of National Car Rental, to wit: 1995 GMC Safari Van, without the permission or consent of the owner or anyone authorized to act for the owner, to enter or remain in the conveyance at the time, with the intent to commit an offense in violation of Florida Statute 810.02.

#### PREDICATE INCIDENT 7

**STANLEY TURNER** and others known and unknown, on or about September 14, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did willfully and maliciously damage personal property, to-wit: 1995 GMC Safari van, belonging to another, to-wit: National

Car Rental, with the damage to said property being greater than \$200 but less than \$1,000 in violation of Florida Statute 806.13(1)(a)(b)1.

#### **PREDICATE INCIDENT 8**

SALVADOR GINABREDA, ANTHONY HORNBECK and others known and unknown, on or about December 27, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Kawasaki ZX6, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Andrew Napp, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 9**

WILFREDO JIMENEZ and others known and unknown, on or about March 8, 1996 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR900, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Dennis Kelley, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 10**

**WILFREDO JIMENEZ** and others known and unknown, on or about March 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR900, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## PREDICATE INCIDENT 11

**SALVADOR GINABREDA, MICHAEL McDONALD, ERIC VANDENBROEK** and others known and unknown, on or about July 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: American Security Insurance, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 12

**SALVADOR GINABREDA, ANTHONY MATHEWS, ERIC VANDENBROEK** and others known and unknown, on or about July 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 13

**ANTHONY MATHEWS** and others known and unknown, on or about July 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did with intent to injure, defraud or deceive an insurance company, to wit: American Security Insurance, present or cause to be presented, prepare with intent to present to any insurance company any written or oral statement as part of or in connection with or in support of any claim for payment or other benefit pursuant to an insurance policy, to wit: Policy Number CDC139715, while knowing that said statement contained false, incomplete, or misleading information concerning any fact or thing material to such claim, to wit: Claim Number C96031612, in violation of Florida Statute 817.234(1)(a).

# **PREDICATE INCIDENT 14**

MICHAEL McDONALD and others known and unknown, on or about July 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly and unlawfully give false information to a law enforcement officer concerning the alleged commission of any crime, to wit: Pinellas County Sheriff's Office Report #96-151890, in violation of Florida Statute 837.05(1).

# **PREDICATE INCIDENT 15**

**DAVID MARK, SALVADOR GINABREDA** and others known and unknown, on or about November 30, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: Sixth and Thirteenth, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR900, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Ahmed Shalash, with the intent to temporarily or permanently deprive said person or a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014

#### PREDICATE INCIDENT 16

MARK DAVID, SALVADOR GINABREDA and others known and unknown, on or about November 30, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Honda CBR900, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# PREDICATE INCIDENT 17

**ROBERT FISHER, JEFFREY HAMMER, ANTHONY MATHEWS** and others known and unknown, on or about February 3, 1997 as part of a related transaction occurring in two or more judicial circuits or in

connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Allstate Insurance Company, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 18**

MARK ROBERT FISHER, JEFFREY HAMMER, ANTHONY MATHEWS and others known and unknown, on or about February 3, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 19**

JEFFREY HAMMER, ANTHONY MATHEWS and others known and unknown, on or about February 3, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did with intent to injure, defraud or deceive an insurance company, to wit: Allstate Insurance Company, present or cause to be presented, prepare with intent to present to any insurance company any written or oral statement as part of or in connection with or in support of any claim for payment or other benefit pursuant to an insurance policy, to wit: Policy Number 641240782, while knowing that said statement contained false, incomplete, or misleading information concerning any fact or thing material to such claim, to wit: Claim Number 2473936025, in violation of Florida Statute 817.234(1)(a).

#### PREDICATE INCIDENT 20

WILFREDOJIMENEZ, RAYMOND ROGERS, BRUCE SHEPARD and others known and unknown, on or about March 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Honda CBR900, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gabino Soto, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 21

RAYMOND ROGERS, BRUCE SHEPARD and others known and unknown, on or about March 24, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Suzuki Katana 600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gabino Soto, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 22

WILFREDO JIMENEZ and others known and unknown, on or about May 15, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Scott Wagner, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 23

**WILFRED JIMENEZ** and others known and unknown, on or about May 15, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 24

WILFREDO JIMENEZ and others known and unknown, on or about May 18, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Kawasaki ZX9, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Dustin Chapman, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 25**

**WILFRED JIMENEZ** and others known and unknown, on or about May 18, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Kawasaki ZX9, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 26**

WILFREDO JIMENEZ and others known and unknown, on or about May 26, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Daniel Pope, with the intent to

temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 27

WILFREDO JIMENEZ and others known and unknown, on or about May 27, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Honda 900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Joseph Taylor, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 28**

WILFREDOJIMENEZ and others known and unknown, on or about May 29, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Hugh Blis, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **PREDICATE INCIDENT 29**

**WILFREDO JIMENEZ** and others known and unknown, on or about May 29, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 30

WILFREDO JIMENEZ and others known and unknown, on or about June 4, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1989 Yamaha FZR1000, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: James Todd, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 31**

WILFREDO JIMENEZ and others known and unknown, on or about June 4, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1989 Yamaha FZR1000, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 32

WILFREDO JIMENEZ, RAYMOND ROGERS and others known and unknown, on or about June 12, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Kawasaki ZX9, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Frank Govan, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 33**

WILFREDO JIMENEZ, RAYMOND ROGERS and others known and unknown, on or about June 12, 1997, as part of a related transaction occurring in two or more judicial circuits or inconnection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial

Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Kawasaki ZX9, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **PREDICATE INCIDENT 34**

JON HERLONG, WILFREDO JIMENEZ, TYLER NUSBAUM, STANLEYTURNER and others known and unknown, on or about July 7, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Ninth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas Orange and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Kawasaki ZX9, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: William Struder, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 35

JON HERLONG, WILFREDO JIMENEZ, TYLER NUSBAUM, STANLEY TURNER and others known and unknown, on or about July 7,1 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Kawasaki ZX9, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 36**

JON HERLONG, WILFREDOJIMENEZ, TYLER NUSBAUMand others known and unknown, on or about July 7, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Ninth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Orange and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Dodge Caravan, of a value of \$300 or more but less

than \$20,000, the property of another, to-wit: Sean Mosley, c/o Resort Recreation, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 37**

JON HERLONG, TYLER NUSBAUM, RAYMOND ROGERS and others known and unknown, on or about July 21, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Yamaha FZR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Lajos Valkovics, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 38**

JON HERLONG, TYLER NUSBAUM RAYMOND ROGERS and others known and unknown, on or about July 23, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Honda 900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Charles Hoehaver, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 39

**RAYMOND ROGERS** and others known and unknown, on or about July 23, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial

circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Honda 900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 40

ROBERT FISHER, JON HERLONG, RAYMOND ROGERS and others known and unknown, on or about July 27, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Suzuki GSXR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Craig Wheeler, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 41

ROBERT FISHER, JON HERLONG, RAYMOND ROGERS and others known and unknown, on or about July 27, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Suzuki GSXR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 42

JON HERLONG, RAYMOND ROGERS, BRIAN SHEPARD and others known and unknown, on or about August 8, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Sean Thomkins, with the intent to temporarily or

permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 43

JON HERLONG, RAYMOND ROGERS, BRIAN SHEPARD and others known and unknown, on or about August 8, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 44

# JON HERLONG, TYLER NUSBAUM, RAYMOND ROGERS, BRIAN

SHEPARD and others known and unknown, on or about August 13, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Dodge Caravan, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mark Brundick, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 45

#### JON HERLONG, TYLER NUSBAUM, RAYMOND ROGERS, BRIAN

**SHEPARD** and others known and unknown, on or about August 13, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Kawasaki ZX750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mark Hollis, with the intent

to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 46

**RAYMOND ROGERS** and others known and unknown, on or about August 16, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Adam Buzbee, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 47

**RAYMOND ROGERS** and others known and unknown, on or about August 16, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Suzuki GSXR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 48**

JON HERLONG, BRIAN SHEPARD and others known and unknown, on or about August 19, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha FZR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Harvey Williams, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## PREDICATE INCIDENT 49

RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD and others known and unknown, on or about September 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Kawasaki ZX9R, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Marek Galanda, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 50**

JON HERLONG, WILFREDO JIMENEZ, STANLEY TURNER and others known and unknown, on or about September 13, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Kawasaki ZX11, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Anthony Sequeira, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 51**

JON HERLONG, WILFREDO JIMENEZ STANLEY TURNER and others known and unknown, on or about September 13, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Kawasaki ZX11, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 52

RAYMOND ROGERS, BRIAN SHEPARD and others known and unknown, on or about September 14, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Dodge Ram Pickup, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Keith Spernak, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 53

RAYMOND ROGERS, BRIAN SHEPARD and others known and unknown, on or about September 14, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 car trailer (homemade), of a value of \$300 or more but less than \$20,000, the property of another, to-wit: William Kein, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 54

RAYMOND ROGERS, BRIAN SHEPARD and others known and unknown, on or about Sepbember 19, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, entered or remained in a conveyance owned by or in the possession of King Automotive and Industrial Equipment, to wit: 1994 Chevrolet C3500 Tow Truck, without the permission or consent of the owner or anyone authorized to act for the owner, to enter or remain in the conveyance at the time, with the intent to commit an offense in violation of Florida Statute 810.02.

# PREDICATE INCIDENT 55

RAYMOND ROGERS, BRIAN SHEPARD and others known and unknown, on or about September 19, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Chevrolet C3500 Tow Truck, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: King Automotive and Industrial Equipment, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 56**

RAYMOND ROGERS, BRUCE SHEPARD and others known and unknown, on or about September 26, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Suzuki GSXR1100, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Graham Waston, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 57

**RAYMOND ROGERS, BRUCE SHEPARD** and others known and unknown, on or about September 26, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Suzuki GSXR1100, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 58**

WILFREDO JIMENEZ, RAYMOND ROGERS and others known and

unknown, on or about October 10, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Michael Oppe, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 59

WILFREDO JIMENEZ, RAYMOND ROGERS and others known and unknown, on or about October 10, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1992 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 60**

BRUCE CASNER, SALVADOR GINABREDA, JON HERLONG, TYLER NUSBAUM, JERRYTANNER and others known and unknown, on or about October 13, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Wells Cargo Enclosed Trailer, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Lawrence Russell, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# PREDICATE INCIDENT 61

MARK DAVID, SALVADOR GINABREDA, DOUGLAS RYDER and

others known and unknown, on or about October 16, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mike Smith, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 62

MARK DAVID, SALVADOR GINABREDA, DOUGLAS RYDER and others known and unknown, on or about October 16, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **PREDICATE INCIDENT 63**

JON HERLONG, TYLER NUSBAUM and others known and unknown, on or about October 23, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Chevrolet G-20 work van, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Clay Waters, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 64

WILFREDO JIMENEZ, RAYMOND ROGERS and others known and unknown, on or about October 24, 1997 as part of a related transaction

occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Suzuki GSCR1100, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Joanna Gomez, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 65**

WILFREDO JIMENEZ, RAYMOND ROGERS and others known and unknown, on or about October 24, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Suzuki GSXR 1100, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 66**

JON HERLONG, ANTHONY MATHEWS, TYLER NUSBAUM, RICHARD SPATZ and others known and unknown, on or about October 25, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Kawasaki Ninja ZX6, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Richard Speer, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# PREDICATE INCIDENT 67

JON HERLONG, ANTHONYMATHEWS, RICHARD SPATZ and others

known and unknown, on or about October 25, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Kawasaki Ninja ZX6, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **PREDICATE INCIDENT 68**

RAYMOND ROGERS and others known and unknown, on or about November 2, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: Dodge Duelly Pickup, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Alvin Bland, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 69

WILFREDO JIMENEZ, RAYMOND ROGERS and others known and unknown, on or about November 2, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha YZF1000, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: David Sutton, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 70**

BRUCE CASNER, JON HERLONG, TYLER NUSBAUM, JERRY

**TANNER** and others known and unknown, on or about November 5, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1989 Yamaha FZR1000, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Ethan Eichelberger, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 71**

BRUCE CASNER, JON HERLONG, JERRYTANNER and others known and unknown, on or about November 5, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1989 Yamaha FZR1000, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 72

JON HERLONG, WILFREDO JIMENEZ and others known and unknown, on or about November 7, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: John Brown, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 73

**JOHN HERLONG, WILFREDO JIMENEZ** and others known and unknown, on or about November 7, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 74

SALVADOR GINABREDA, JON HERLONG, TYLER NUSBAUM and others known and unknown, on or about November 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Dodge Ram Van, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Felipe Olivero, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 75

SALVADOR GINABREDA, JON HERLONG, TYLER NUSBAUM and others known and unknown, on or about November 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Luis Marques, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 76**

SALVADOR GINABREDA, JON HERLONG, TYLER NUSBAUM,

RICHARD SPATZ and others known and unknown, on or about November 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Alane Dykes, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 77

**SALVADOR GINABREDA, RICHARD SPATZ** and others known and unknown, on or about November 9, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 78**

#### WILFREDO JIMENEZ, RAYMOND ROGERS, STANLEY TURNER

and others known and unknown, on or about November 11, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR1100, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Neville Devalle, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 79**

WILFREDO JIMENEZ, RAYMOND ROGERS, STANLEY TURNER

and others known and unknown, on or about November 11, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Suzuki GSXR1100, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **PREDICATE INCIDENT 80**

ROBERT FISHER, JON HERLONG, LARRY LEDFORD, TYLER

**NUSBAUM,** and others known and unknown, on or about November 11, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Kawasaki ZX6R, of a value of \$300 or more

but less than \$20,000, the property of another, to-wit: John Foster, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 81

ROBERT FISHER, JON HERLONG, LARRY LEDFORD and others known and unknown, on or about November 11, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Kawasaki ZX6R, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 82

ROBERT FISHER, JON HERLONG, LARRY LEDFORD, TYLER

**NUSBAUM** and others known and unknown, on or about November 15, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or

use a motor vehicle, to-wit: 1994 Kawasaki ZX750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: James Gaffney, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# PREDICATE INCIDENT 83

ROBERT FISHER, JON HERLONG, LARRY LEDFORD and others known and unknown, on or about November 15, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Kasawaki ZX750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 84**

WILFREDO JIMENEZ, RAYMOND ROGERS, MARCO DIAZ and others known and unknown, on or about November 17, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1988 Plymouth Voyager, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Scott Bram, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 85**

WILFREDO JIMENEZ, RAYMOND ROGERS, MARCO DIAZ and others known and unknown, on or about November 17, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1990 Chrysler Town-Country, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Suzanne Nading, with the

intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **PREDICATE INCIDENT 86**

WILFREDO JIMENEZ, RAYMOND ROGERS, MARCO DIAZ and others known and unknown, on or about November 17, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Michael Bondondeo, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 87

WILFREDO JIMENEZ, RAYMOND ROGERS, RICHARD SPATZ, MARCO DIAZ and others known and unknown, on or about November 17, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Suzuki GSXR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Jason Gage, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 88

WILFREDOJIMENEZ, RAYMOND ROGERS, RICHARD SPATZ, and others known and unknown, on or about November 17, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997

Suzuki GSXR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### PREDICATE INCIDENT 89

**ROBERT FISHER, JON HERLONG, LARRY LEDFORD, JOSHUA MILLER, JERRY TANNER,** and others known and unknown, on or about November 20, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Steve Edwards, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 90

ROBERT FISHER, JON HERLONG, LARRY LEDFORD, JOSHUA MILLER JERRY TANNER and others known and unknown, on or about November 20, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Suzuki GSXR750 that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### PREDICATE INCIDENT 91

BRUCE CASNER, RAYMOND ROGERS and others known and unknown, on or about November 25, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Arlyn Schauer, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not

# **PREDICATE INCIDENT 92**

BRUCE CASNER, RAYMOND ROGERS and others known and unknown, on or about November 25, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### PREDICATE INCIDENT 93

**JON HERLONG, JERRYTANNER** and others known and unknown, on or about November 26, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha YFM350 "Warrior" ATV and 1997 Yamaha YFZ350 "Banchee" ATV, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Charles Wiggins, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 94

ROBERT FISHER, WILFREDO JIMENEZ, RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD, MARCO DIAZ and others known and unknown, on or about November 27, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Alexander Martin, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 95

ROBERT FISHER, WILFREDO JIMENEZ, RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD, MARCO DIAZ and others known and unknown, on or about November 27, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 96

JOHN HERLONG, JERRYTANNER and others known and unknown, on or about November 29, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use property of another, to-wit: 3 month old English Bulldog, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mike Julian, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 97

# ROBERT FISHER, SALVADOR GINABREDA, JONHERLONG, JERY

**TANNER** and others known and unknown, on or about December 5, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha YZR600R, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Timothy Quinn, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 98

**ROBERT FISHER, SALVADOR GINABREDA** and others known and unknown, on or about December 5, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 19997 Yamaha YZR600R, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 99**

ROBERT FISHER, JON HERLONG, JERRYTANNER and others known and unknown, on or about December 8, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR1100WR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Campbell Hunt, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **PREDICATE INCIDENT 100**

ROBERT FISHER, JON HERLONG, JERRYTANNER and others known and unknown, on or about December 8, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Suzuki GSXR1100WR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 101

**JON HERLONG, JERRY TANNER, TYLER NUSBAUM** and others known and unknown, on or about December 21, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough

Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Chauncey Flannery, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 102

JON HERLONG, JERRY TANNER, TYLER NUSBAUM and others known and unknown, on or about December 21, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Chevrolet truck, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Eric Loiselle, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 103

JON HERLONG, JERRY TANNER, TYLER NUSBAUM and others known and unknown, on or about December 26, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Bull Box Trailer, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: James Green, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **PREDICATE INCIDENT 104**

**ROBERT FISHER, JON HERLONG, JERRY TANNER, TYLER NUSBAUM** and others known and unknown, on or about December 30, 1997, as part of a related transaction occurring in two or more judicial circuits or in

connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR7, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Anthony Steg, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# PREDICATE INCIDENT 105

ROBERT FISHER, JON HERLONG, JERRY TANNER and others known and unknown, on or about December 30, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Suzuki GSXR7, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 106

ROBERT FISHER, JON HERLONG, JERRY TANNER and others known and unknown, on or about January 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Christopher Greer, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 107

**ROBERT FISHER, JON HERLONG, JERRYTANNER** and others known and unknown, on or about January 4 1998, as part of a related transaction

occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **PREDICATE INCIDENT 108**

JON HERLONG, TYLER NUSBAUM, DOUGLAS RYDER and others known and unknown, on or about January 6, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Steve Talacki, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 109

**JON HERLONG, DOUGLAS RYDER** and others known and unknown, on or about January 6, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Suzuki GSCR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 110

**SALVADOR GINABREDA, JON HERLONG, TYLER NUSBAUM, MICHAEL VINCELLI** and others known and unknown, on or about January 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Scott Onstad, with

the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 111

SALVADOR GINABREDA, MICHAEL VINCELLI and others known and unknown, on or about January 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 112

JON HERLONG, TYLER NUSBAUM and others known and unknown, on or about January 13, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mark Wouldridge, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 113

**JON HERLONG** and others known and unknown, on or about January 13, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1992 Honda CBR600 that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 114**

JON HERLONG, JERRY TANNER, TYLER NUSBAUM and others known and unknown, on or about January 21, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1982 Chevrolet S10 Pickup, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Janine Gallant, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 115

JON HERLONG, TYLER NUSBAUM, JERRY TANNER and others known and unknown, on or about January 21, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Kawasaki Ninja ZX11, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Craig Wombwell, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 116

**JON HERLONG, JERRY TANNER** and others known and unknown, on or about January 21, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Kawasaki Ninja ZX11, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **PREDICATE INCIDENT 117**

**JON HERLONG, SONNY PIERCE** and others known and unknown, on or about February 3, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting

two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gary Welch, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 118**

**JON HERLONG, SONNY PIERCE** and others known and unknown, on or about February 3, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Honda CBR900RR that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 119

**JON HERLONG, TYLER NUSBAUM, JERRY TANNER, JOSEPH TIMPONE** and others known and unknown, on or about February 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Kawasaki ZX7, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Sean Costello, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 120

**JON HERLONG, JERRY TANNER, JOSEPH TIMPONE** and others known and unknown, on or about February 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough

Counties, did traffic in or endeavor to traffic in property, to wit: 1992 Kawasaki ZX7, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# PREDICATE INCIDENT 121

BRUCE CASNER, RAYMOND ROGERS, BRUCE SHEPARD and others known and unknown, on or about February 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gary Braunstein, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 122

BRUCE CASNER, RAYM OND ROGERS, BRUCE SHEPARD and others known and unknown, on or about February 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 123

JON HERLONG, ANTHONYLINDNER, JERRYTANNER, and others known and unknown, on or about February 7, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1985 Harley Davidson FXE, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: David Mager, with

the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 124

JON HERLONG, ANTHONY LINDNER, JERRY TANNER and others known and unknown, on or about February 7, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 US Cargo Enclosed Trailer, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: David Mager, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 125**

JON HERLONG, ANTHONY LINDNER, JERRY TANNER and others known and unknown, on or about February 7, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use property of another, to-wit: Craftsman tool chest and tools, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: David Mager, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 126

ROBERT FISHER, JON HERLONG, LARRY LEDFORD, JERRY TANNER and others known and unknown, on or about February 10, 1998 as

part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Suzuki GSCR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Timothy Spurlock, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 127**

**ROBERT FISHER, JON HERLONG** and others known and unknown, on or about February 10, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Suzuki GSXR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 128**

# ROBERT FISHER, JON HERLONG, TYLER NUSBAUM, JERRY

**TANNER** and others known and unknown, on or about February 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Kawasaki ZX6R, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gregory Taylor, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 129**

**ROBERT FISHER, JON HERLONG, JERRYTANNER** and others known and unknown, on or about February 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized

criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Kawasaki ZX6R, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 130**

**JON HERLONG, JERRY TANNER** and others known and unknown, on or about February 15, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Yamaha FZR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Migel Torres, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 131**

**JON HERLONG, JERRY TANNER** and others known and unknown, on or about February 15, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Yamaha FZR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 132**

RAYMOND ROGERS, BRIAN SHEPARD and others known and unknown, on or about March 2, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda VFR750, of a value of \$300 or more but less than \$20,000, the property of

another, to-wit: Michael Flynn, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 133**

RAYMOND ROGERS, BRIAN SHEPARD and others known and unknown, on or about March 2, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda VFR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 134**

BRUCE CASNER, JON HERLONG and others known and unknown, on or about March 8, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: James Axtman, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 135

**BRUCE CASNER, JON HERLONG** and others known and unknown, on or about March 8, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Suzuki GSXR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### PREDICATE INCIDENT 136

BRUCE CASNER, BRIAN SHEPARD, BRUCE SHEPARD and others known and unknown, on or about March 12, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1990 Honda CBR1000, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Michael Dixon, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 137

BRUCE CASNER, BRIAN SHEPARD, BRUCE SHEPARD and others known and unknown, on or about March 12, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1990 Honda CBR1000, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **PREDICATE INCIDENT 138**

BRUCE CASNER, BRIAN SHEPARD, BRUCE SHEPARD and others known and unknown, on or about March 15, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Jose Tepedino, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 139

**BRUCE CASNER, BRIAN SHEPARD, BRUCE SHEPARD** and others known and unknown, on or about March 15, 1998, as part of a related

transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **PREDICATE INCIDENT 140**

BRUCE CASNER, ROBERT FISHER, BRIAN SHEPARD, BRUCE SHEPARD and others known and unknown, on or about April 2, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Bo Sigurd, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 141

**BRUCE CASNER, ROBERT FISHER, BRIAN SHEPRD, BRUCE SHEPARD** and others known and unknown, on or about April 2, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 142**

WILFREDO JIMENEZ, RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD and others known and unknown, on or about April 8, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR 600, of a

value of \$300 or more but less than \$20,000, the property of another, to-wit: Stephen Tan, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 143**

WILFREDO JIMENEZ, RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD and others known and unknown, on or about April 8, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 144**

BRIAN SHEPARD, BRUCE SHEPARD and others known and unknown, on or about April 9, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Richard Montgomery, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 145**

**BRIAN SHEPARD, BRUCE SHEPARD** and others known and unknown, on or about April 9, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Suzuki GSXR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 146

**JON HERLONG, JERRY TANNER** and others known and unknown, on or about April 9, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Haul Trailer, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Brian Morse, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# PREDICATE INCIDENT 147

**JON HERLONG, JERRY TANNER** and others known and unknown, on or about April 9, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, entered or remained in a conveyance owned by or in the possession of Brian Morse, to wit: 1993 Haul Trailer, without the permission or consent of the owner or anyone authorized to act for the owner, to enter or remain in the conveyance at the time, with the intent to commit an offense in violation of Florida Statute 810.02.

#### PREDICATE INCIDENT 148

BRUCE CASNER, ROBERT FISHER, JON HERLONG, TYLER NUSBAUM, JERRYTANNER and others known and unknown, on or about April 15, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Terrence Clark, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### PREDICATE INCIDENT 149

**BRUCE CASNER, ROBERT FISHER, JON HERLONG, JERRY TANNER** and others known and unknown, on or about April 15, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic inor endeavor to traffic in property, to wit: 1993 Honda CBR600 that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **PREDICATE INCIDENT 150**

WILFREDO JIMENEZ and others known and unknown, on or about May 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Honda CBR1000F, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Victor Baker, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **PREDICATE INCIDENT 151**

**WILFREDO JIMENEZ** and others known and unknown, on or about May 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Honda CBR 1000F, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 152**

MARK CEQUEIRA, MARK DAVID and others known and unknown, on or about May 14, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use,

or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: John Bass, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 153

**SALVADOR GINABREDA** and others known and unknown, on or about May 14, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 154

WILFREDO JIMENEZ and others known and unknown, on or about June 51, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Suzuki Katana 600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Dana Baron, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 155

**WILFREDO JIMENEZ** and others known and unknown, on or about June 5, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Suzuki Katana 600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### PREDICATE INCIDENT 156

WILFREDO JIMENEZ and others known and unknown, on or about June 14, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha YZF600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Kristopher Lucas, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# PREDICATE INCIDENT 157

**WILFREDO JIMENEZ** and others known and unknown, on or about June 14, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Yamaha YZF600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **PREDICATE INCIDENT 158**

WILFREDO JIMENEZ and others known and unknown, on or about June 18, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Yamaha FZR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Jason Hall, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### PREDICATE INCIDENT 159

**WILFREDO JIMENEZ** and others known and unknown, on or about June 18, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial

circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Yamaha FZR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **PREDICATE INCIDENT 160**

WILFREDO JIMENEZ and others known and unknown, on or about July 10, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1998 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: James Cass, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

All in violation of Florida Statutes Section 895.03(3).

#### COUNT 2

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that, between, on or about August 19, 1994, to July 10, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to-wit: the Sixth, Seventh, Eighth, Ninth, Twelfth and Thirteenth Judicial Circuits of Florida; that is Pinellas, Volusia, Alachua, Orange, Osceola, Manatee, Sarasota and Hillsborough Counties, **BRUCE CASNER, ROBERT FISHER, SALVADOR GINABREDA, JON HERLONG, WILFREDO JIMENEZ, RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD, JERRYTANNER,** and others known or unknown, did unlawfully and knowingly combine, conspire, confederate and agree, each with the other and together with Anthony Hornbeck, Anthony Mathews, Sonny Pierce, Richard Spatz, Joseph Timpone, Michael Vincelli, Eric Vandenbroek, Mark Cequeria, Mark David, MARCO Diaz, Jeffrey Hammer, Larry Ledford, Anthony Lindner, Michael McDonald, Joshua Miller, Tyler Nusbaum, Douglas Ryder and Stanley Turner, and others, known and unknown, to violate the laws of the State of Florida, to-wit: the laws which prohibit any persons employed by or associated with any enterprise consisting of the

following persons: BRUCE CASNER, ROBERT FISHER, SALVADOR GINABREDA, JON HERLONG, WILFREDO JIMENEZ, RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD, JERRY TANNER and Anthony Hornbeck, Anthony Mathews, Sonny Pierce, Richard Spatz, Joseph Timpone, Michael Vincelli, Eric Vandenbroek, Mark Cequeria, Mark David, Marco Diaz, Jeffrey Hammer, Larry Ledford, Anthony Lindner, Michael McDonald, Joshua Miller, Tyler Nusbaum, Douglas Ryder and Stanley Turner and others known and unknown, from conducting or participating, either directly or indirectly, in the affairs of said enterprise through a continuous pattern of racketeering activity, as defined in Florida Statutes Section(s) 895.02(4), by engaging in at least two of the aforementioned incidents of racketeering conduct which had similar intents, results, accomplices, victims, or methods of commission, or were otherwise related by distinguishing characteristics and were not isolated incidents, in violation of Florida Statutue 895.03(4).

# **COUNT 3**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ANTHONY MATHEWS, RICHARD SPATZ** and others known and unknown, on or about August 19, 1994 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Rodney Miller, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 4

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ANTHONY MATHEWS, RICHARD SPATZ**, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Suzuki GSXR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 5**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA** and others known and unknown, on or about March 11, 1995 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Jason Sauser, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 6**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA** and others known and unknown, on or about March 11, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Honda CBR900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 7**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA** and others known and unknown, on or about March 11, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly and unlawfully possess a motor vehicle, to wit: 1994 Honda CBR900RR, with an altered vehicle identification number, in violation of Florida Statute 319.33(1)(d).

### **COUNT 8**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **STANLEY TURNER** and others known and unknown, on or about September 14, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 GMC Safari Van, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: National Car Rental, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### COUNT 9

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **STANLEY TURNER** and others known and unknown, on or about September 14, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, entered or remained in a conveyance owned by or in the possession of National Car Rental, to wit: 1995 GMC Safari Van, without the permission or consent of the owner or anyone authorized to act for the owner, to enter or remain in the conveyance at the time, with the intent to commit an offense in violation of Florida Statute 810.02.

#### COUNT 10

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **STANLEY TURNER** and others known and unknown, on or about September 14, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did willfully and maliciously damage personal property, to-wit: 1995 GMC Safari van, belonging to another, to-wit: National Car Rental, with the damage to said property being greater than \$200 but less than \$1,000 in violation of Florida Statute 806.13(1)(a)(b)1.

### **COUNT 11**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA**, **ANTHONY HORNBECK** and others known and unknown, on or about December 27, 1995, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Kawasaki ZX6, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Andrew Napp, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 12

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO**  **JIMENEZ** and others known and unknown, on or about March 8, 1996 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR900, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Dennis Kelley, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# COUNT 13

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about March 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR900, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### COUNT 14

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA**, **MICHAEL McDONALD**, **ERIC VANDENBROEK** and others known and unknown, on or about July 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: American Security Insurance, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 15

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA**, **ANTHONY MATHEWS**, **ERIC VANDENBROEK** and others known and unknown, on or about July 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit:

the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 16**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA** and others known and unknown, on or about July 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowinly and unlawfully possess a motor vehicle, to wit: 1996 Honda CBR600, with an altered vehicle identification number, in violation of Florida Statute 319.33(1)(d).

# **COUNT 17**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ANTHONY MATHEWS** and others known and unknown, on or about July 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did with intent to injure, defraud or deceive an insurance company, to wit: American Security Insurance, present or cause to be presented, prepare with intent to present to any insurance company any written or oral statement as part of or in connection with or in support of any claim for payment or other benefit pursuant to an insurance policy, to wit: Policy Number CDC139715, while knowing that said statement contained false, incomplete, or misleading information concerning any fact or thing material to such claim, to wit: Claim Number C96031612, in violation of Florida Statute 817.234(1)(a).

### **COUNT 18**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that **MICHAEL McDONALD** and others known and unknown, on or about July 8, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly and unlawfully give false information to a law enforcement officer concerning the alleged commission of any crime, to wit: Pinellas County Sheriff's Office Report #96-151890, in violation of Florida Statute 837.05(1).

### COUNT 19

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **DAVID MARK**, **SALVADOR GINABREDA** and others known and unknown, on or about November 30, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: Sixth and Thirteenth, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR900, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Ahmed Shalash, with the intent to temporarily or permanently deprive said person or a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014

# COUNT 20

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **MARK DAVID**, **SALVADOR GINABREDA** and others known and unknown, on or about November 30, 1996, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Honda CBR900, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 21**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JEFFREY HAMMER**, **ANTHONY MATHEWS** and others known and unknown, on or about February 3, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Allstate Insurance Company, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 22

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **MARK ROBERT FISHER, JEFFREY HAMMER, ANTHONY MATHEWS** and others known and unknown, on or about February 3, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 23**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JEFFREYHAMMER**, **ANTHONY MATHEWS** and others known and unknown, on or about February 3, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did with intent to injure, defraud or deceive an insurance company, to wit: Allstate Insurance Company, present or cause to be presented, prepare with intent to present to any insurance company any written or oral statement as part of or in connection with or in support of any claim for payment or other benefit pursuant to an insurance policy, to wit: Policy Number 641240782, while knowing that said statement contained false, incomplete, or misleading information concerning any fact or thing material to such claim, to wit: Claim Number 2473936025, in violation of Florida Statute 817.234(1)(a).

#### COUNT 24

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ**, **RAYMOND ROGERS**, **BRUCE SHEPARD** and others known and unknown, on or about March 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Honda CBR900, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gabino Soto, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 25

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through

the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRUCE SHEPARD** and others known and unknown, on or about March 24, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Suzuki Katana 600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gabino Soto, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 26

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about May 15, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Scott Wagner, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 27**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFRED JIMENEZ** and others known and unknown, on or about May 15, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 28**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO**  **JIMENEZ** and others known and unknown, on or about May 18, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Kawasaki ZX9, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Dustin Chapman, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 29**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFRED JIMENEZ** and others known and unknown, on or about May 18, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Kawasaki ZX9, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### COUNT 30

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about May 26, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Daniel Pope, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 31**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about May 27, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Honda 900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit:

Joseph Taylor, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### COUNT 32

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about May 29, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Hugh Blis, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## COUNT 33

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about May 29, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### COUNT 34

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about June 4, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1989 Yamaha FZR1000, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: James Todd, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 35

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about June 4, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1989 Yamaha FZR1000, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# COUNT 36

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS** and others known and unknown, on or about June 12, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Kawasaki ZX9, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Frank Govan, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# COUNT 37

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS** and others known and unknown, on or about June 12, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Kawasaki ZX9, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### COUNT 38

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **WILFREDO JIMENEZ**, **TYLER NUSBAUM**, **STANLEY TURNER** and others known and unknown, on or about July 7, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Ninth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas Orange and Hillsborough Counties,

did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Kawasaki ZX9, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: William Struder, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 39**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **WILFREDO JIMENEZ**, **TYLER NUSBAUM**, **STANLEY TURNER** and others known and unknown, on or about July 7,1 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Kawasaki ZX9, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### COUNT 40

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **WILFREDO JIMENEZ**, **TYLER NUSBAUM** and others known and unknown, on or about July 7, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Ninth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Orange and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Dodge Caravan, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Sean Mosley, c/o Resort Recreation, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 41

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **TYLER NUSBAUM**, **RAYMOND ROGERS** and others known and unknown, on or about July 21, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Yamaha FZR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Lajos Valkovics, with the intent to temporarily or permanently

deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 42**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **TYLER NUSBAUM RAYMOND ROGERS** and others known and unknown, on or about July 23, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Honda 900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Charles Hoehaver, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# COUNT 43

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS** and others known and unknown, on or about July 23, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Honda 900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### COUNT 44

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, RAYMOND ROGERS** and others known and unknown, on or about July 27, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Suzuki GSXR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Craig Wheeler, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### COUNT 45

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, RAYMOND ROGERS** and others known and unknown, on or about July 27, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Suzuki GSXR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 46**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **RAYMOND ROGERS**, **BRIAN SHEPARD** and others known and unknown, on or about August 8, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Sean Thomkins, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 47**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **RAYMOND ROGERS**, **BRIAN SHEPARD** and others known and unknown, on or about August 8, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 48**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **TYLER NUSBAUM, RAYMOND ROGERS, BRIAN SHEPARD** and others known and unknown, on or about August 13, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain

or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Dodge Caravan, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mark Brundick, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 49**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **TYLER NUSBAUM, RAYMOND ROGERS, BRIAN SHEPARD** and others known and unknown, on or about August 13, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Kawasaki ZX750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mark Hollis, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### COUNT 50

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS** and others known and unknown, on or about August 16, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Adam Buzbee, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### COUNT 51

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS** and others known and unknown, on or about August 16, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Suzuki GSXR750,

that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# COUNT 52

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **BRIAN SHEPARD** and others known and unknown, on or about August 19, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha FZR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Harvey Williams, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 53

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD** and others known and unknown, on or about September 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Kawasaki ZX9R, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Marek Galanda, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# COUNT 54

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **WILFREDO JIMENEZ**, **STANLEY TURNER** and others known and unknown, on or about September 13, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Kawasaki ZX11, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Anthony Sequeira, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation

### COUNT 55

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **WILFREDO JIMENEZ STANLEY TURNER** and others known and unknown, on or about September 13, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Kawasaki ZX11, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 56**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRIAN SHEPARD** and others known and unknown, on or about September 14, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Dodge Ram Pickup, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Keith Spernak, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### COUNT 57

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRIAN SHEPARD** and others known and unknown, on or about September 14, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 car trailer (homemade), of a value of \$300 or more but less than \$20,000, the property of another, to-wit: William Kein, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### COUNT 58

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRIAN SHEPARD** and others known and unknown, on or about Sepbember 19, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, entered or remained in a conveyance owned by or in the possession of King Automotive and Industrial Equipment, to wit: 1994 Chevrolet C3500 Tow Truck, without the permission or consent of the owner or anyone authorized to act for the owner, to enter or remain in the conveyance at the time, with the intent to commit an offense in violation of Florida Statute 810.02.

## COUNT 59

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRIAN SHEPARD** and others known and unknown, on or about September 19, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Chevrolet C3500 Tow Truck, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: King Automotive and Industrial Equipment, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### COUNT 60

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRUCE SHEPARD** and others known and unknown, on or about September 26, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Suzuki GSXR1100, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Graham Waston, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 61**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through

the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRUCE SHEPARD** and others known and unknown, on or about September 26, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Suzuki GSXR1100, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 62**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS** and others known and unknown, on or about October 10, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Michael Oppe, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 63**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS** and others known and unknown, on or about October 10, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1992 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 64**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **SALVADOR GINABREDA**, **JON HERLONG**, **TYLER NUSBAUM**, **JERRY TANNER** and others known and unknown, on or about October 13, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough

Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Wells Cargo Enclosed Trailer, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Lawrence Russell, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# COUNT 65

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that MARK DAVID, SALVADOR GINABREDA, DOUGLAS RYDER and others known and unknown, on or about October 16, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mike Smith, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 66**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that MARK DAVID, SALVADOR GINABREDA, DOUGLAS RYDER and others known and unknown, on or about October 16, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### COUNT 67

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that **DOUGLAS RYDER** and others known and unknown, on or about October 16, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowinly and unlawfully possess a motor vehicle, to wit: 1995 Honda CBR900RR, with an altered vehicle identification number, in violation of Florida Statute 319.33(1)(d).

## **COUNT 68**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **TYLER NUSBAUM** and others known and unknown, on or about October 23, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Chevrolet G-20 work van, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Clay Waters, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 69**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS** and others known and unknown, on or about October 24, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Suzuki GSCR1100, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Joanna Gomez, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 70**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS** and others known and unknown, on or about October 24, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Suzuki GSXR 1100, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 71**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, ANTHONY MATHEWS, TYLER NUSBAUM, RICHARD SPATZ and others known and unknown, on or about October 25, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Kawasaki Ninja ZX6, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Richard Speer, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 72**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **ANTHONY MATHEWS**, **RICHARD SPATZ** and others known and unknown, on or about October 25, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic inproperty, to wit: 1996 Kawasaki Ninja ZX6, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 73**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS** and others known and unknown, on or about November 2, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: Dodge Duelly Pickup, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Alvin Bland, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 74**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS** and others known and unknown, on or about November 2, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial

Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha YZF1000, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: David Sutton, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 75**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **JON HERLONG, TYLER NUSBAUM, JERRY TANNER** and others known and unknown, on or about November 5, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1989 Yamaha FZR1000, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Ethan Eichelberger, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 76**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **JON HERLONG, JERRYTANNER** and others known and unknown, on or about November 5, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1989 Yamaha FZR1000, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 77**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **WILFREDO JIMENEZ** and others known and unknown, on or about November 7, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR600, of a value of \$300 or more but less than \$20,000, the

property of another, to-wit: John Brown, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 78**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JOHN HERLONG**, **WILFREDO JIMENEZ** and others known and unknown, on or about November 7, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 79**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA**, **JON HERLONG**, **TYLER NUSBAUM** and others known and unknown, on or about November 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Dodge Ram Van, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Felipe Olivero, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 80**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA, JON HERLONG, TYLER NUSBAUM** and others known and unknown, on or about November 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Luis Marques, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to

appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 81**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA, JON HERLONG, TYLER NUSBAUM, RICHARD SPATZ** and others known and unknown, on or about November 9, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Alane Dykes, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 82**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA**, **RICHARD SPATZ** and others known and unknown, on or about November 9, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 83**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA** and others known and unknown, on or about November 1, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowinly and unlawfully possess a motor vehicle, to wit: 1993 Honda CBR600, with an altered vehicle identification number, in violation of Florida Statute 319.33(1)(d).

### **COUNT 84**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through

JIMENEZ, RAYMOND ROGERS, STANLEY TURNER and others known and unknown, on or about November 11, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR1100, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Neville Devalle, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## COUNT 85

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS, STANLEY TURNER** and others known and unknown, on or about November 11, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Suzuki GSXR1100, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 86**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, LARRY LEDFORD, TYLER NUSBAUM,** and others known and unknown, on or about November 11, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Kawasaki ZX6R, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: John Foster, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 87**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERTFISHER**, **JON HERLONG**, **LARRY LEDFORD** and others known and unknown, on or about November 11, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Kawasaki ZX6R, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 88**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, LARRY LEDFORD, TYLER NUSBAUM** and others known and unknown, on or about November 15, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Kawasaki ZX750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: James Gaffney, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 89**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, LARRYLEDFORD** and others known and unknown, on or about November 15, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Kasawaki ZX750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### COUNT 90

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS, MARCO DIAZ** and others known and unknown, on or about November 17, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1988 Plymouth Voyager, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Scott Bram, with the intent to

temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 91**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS, MARCO DIAZ** and others known and unknown, on or about November 17, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1990 Chrysler Town-Country, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Suzanne Nading, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 92**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS, MARCO DIAZ** and others known and unknown, on or about November 17, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Michael Bondondeo, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 93**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS, RICHARD SPATZ, MARCO DIAZ** and others known and unknown, on or about November 17, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Suzuki

GSXR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Jason Gage, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### COUNT 94

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ**, **RAYMOND ROGERS**, **RICHARD SPATZ**, and others known and unknown, on or about November 17, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Suzuki GSXR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# COUNT 95

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, LARRY LEDFORD, JOSHUA MILLER, JERRY TANNER**, and others known and unknown, on or about November 20, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Steve Edwards, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 96**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, LARRYLEDFORD, JOSHUA MILLER JERRY TANNER** and others known and unknown, on or about November 20, 1997, as part of a related transaction occurring in two or more judicial circuits or inconnection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Suzuki GSXR750 that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 97**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **RAYMOND ROGERS** and others known and unknown, on or about November 25, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Arlyn Schauer, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 98**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **RAYMOND ROGERS** and others known and unknown, on or about November 25, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 99**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRY TANNER** and others known and unknown, on or about November 26, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha YFM350 "Warrior" ATV and 1997 Yamaha YFZ350 "Banchee" ATV, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Charles Wiggins, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 100**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through

the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERTFISHER**, **WILFREDO JIMENEZ**, **RAYMOND ROGERS**, **BRIAN SHEPARD**, **BRUCE SHEPARD**, **MARCO DIAZ** and others known and unknown, on or about November 27, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Alexander Martin, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 101**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **WILFREDO JIMENEZ**, **RAYMOND ROGERS**, **BRIAN SHEPARD**, **BRUCE SHEPARD**, **MARCO DIAZ** and others known and unknown, on or about November 27, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR900RR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 102**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JOHN HERLONG**, **JERRY TANNER** and others known and unknown, on or about November 29, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use property of another, to-wit: 3 month old English Bulldog, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mike Julian, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 103**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **SALVADOR GINABREDA**, **JON HERLONG**, **JERYTANNER** and others known and unknown, on or about December 5, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha YZR600R, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Timothy Quinn, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 104**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **SALVADOR GINABREDA** and others known and unknown, on or about December 5, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 19997 Yamaha YZR600R, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 105**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, JERRYTANNER** and others known and unknown, on or about December 8, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR1100WR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Campbell Hunt, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 106**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, JERRYTANNER** and others known and unknown, on or about December 8, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to

wit: 1991 Suzuki GSXR1100WR, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 107**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRYTANNER, TYLER NUSBAUM** and others known and unknown, on or about December 21, 1997 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Chauncey Flannery, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 108**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRY TANNER**, **TYLER NUSBAUM** and others known and unknown, on or about December 21, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Chevrolet truck, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Eric Loiselle, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 109**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRYTANNER, TYLER NUSBAUM** and others known and unknown, on or about December 26, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Bull Box Trailer, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: James Green, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 110**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, JERRY TANNER, TYLER NUSBAUM** and others known and unknown, on or about December 30, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Suzuki GSXR7, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Anthony Steg, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 111**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG**, **JERRY TANNER** and others known and unknown, on or about December 30, 1997, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Suzuki GSXR7, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 112**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, JERRYTANNER** and others known and unknown, on or about January 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Christopher Greer, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 113**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG**, **JERRY TANNER** and others known and unknown, on or about January 4 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 114**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **TYLER NUSBAUM**, **DOUGLAS RYDER** and others known and unknown, on or about January 6, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Steve Talacki, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 115**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **DOUGLAS RYDER** and others known and unknown, on or about January 6, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Suzuki GSCR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 116**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA**, **JON HERLONG**, **TYLER NUSBAUM**, **MICHAEL VINCELLI** and others known and unknown, on or about January 11, 1998, as part of a related transaction occurring in two or more judicial circuits or inconnection withan organized criminal conspiracy affecting two or more judicial circuits,

to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Scott Onstad, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 117**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA**, **MICHAEL VINCELLI** and others known and unknown, on or about January 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 118**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA** and others known and unknown, on or about January 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Pasco and Hillsborough Counties, did knowinly and unlawfully possess a motor vehicle, to wit: 1994 Honda CBR600, with an altered vehicle identification number, in violation of Florida Statute 319.33(1)(d).

# **COUNT 119**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **TYLER NUSBAUM** and others known and unknown, on or about January 13, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Mark Wouldridge, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 120**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG** and others known and unknown, on or about January 13, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1992 Honda CBR600 that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 121**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRY TANNER**, **TYLER NUSBAUM** and others known and unknown, on or about January 21, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1982 Chevrolet S10 Pickup, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Janine Gallant, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 122**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **TYLER NUSBAUM**, **JERRY TANNER** and others known and unknown, on or about January 21, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Kawasaki Ninja ZX11, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Craig Wombwell, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 123**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRY TANNER** and others known and unknown, on or about January 21, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Kawasaki Ninja ZX11, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 124**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **SONNY PIERCE** and others known and unknown, on or about February 3, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR900RR, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gary Welch, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 125**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **SONNY PIERCE** and others known and unknown, on or about February 3, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Honda CBR900RR that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 126**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **TYLER NUSBAUM**, **JERRY TANNER**, **JOSEPH TIMPONE** and others known and unknown, on or about February 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1992 Kawasaki ZX7, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Sean Costello, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute

#### **COUNT 127**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRY TANNER**, **JOSEPH TIMPONE** and others known and unknown, on or about February 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1992 Kawasaki ZX7, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 128**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **RAYMOND ROGERS, BRUCE SHEPARD** and others known and unknown, on or about February 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gary Braunstein, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 129**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **RAYMOND ROGERS, BRUCE SHEPARD** and others known and unknown, on or about February 4, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 130**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through

the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **ANTHONY LINDNER**, **JERRY TANNER**, and others known and unknown, on or about February 7, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1985 Harley Davidson FXE, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: David Mager, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 131**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **ANTHONY LINDNER**, **JERRY TANNER** and others known and unknown, on or about February 7, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 US Cargo Enclosed Trailer, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: David Mager, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 132**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **ANTHONY LINDNER**, **JERRY TANNER** and others known and unknown, on or about February 7, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use property of another, to-wit: Craftsman tool chest and tools, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: David Mager, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 133**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JERRYTANNER** and others known and unknown, on or about February 7, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Twelfth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Manatee and Hillsborough Counties, did knowinly and unlawfully possess a motor vehicle, to wit: 1997 US Cargo Enclosed Trailer, with an altered vehicle identification number, in violation of Florida Statute 319.33(1)(d).

# **COUNT 134**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, LARRY LEDFORD, JERRY TANNER** and others known and unknown, on or about February 10, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Suzuki GSCR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Timothy Spurlock, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 135**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG** and others known and unknown, on or about February 10, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Suzuki GSXR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 136**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, TYLER NUSBAUM, JERRY TANNER** and others known and unknown, on or about February 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain

or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Kawasaki ZX6R, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Gregory Taylor, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 137**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **ROBERT FISHER**, **JON HERLONG, JERRYTANNER** and others known and unknown, on or about February 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Kawasaki ZX6R, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 138**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRYTANNER** and others known and unknown, on or about February 15, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Yamaha FZR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Migel Torres, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 139**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRY TANNER** and others known and unknown, on or about February 15, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Yamaha FZR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

#### **COUNT 140**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRIAN SHEPARD** and others known and unknown, on or about March 2, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda VFR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Michael Flynn, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 141**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **RAYMOND ROGERS, BRIAN SHEPARD** and others known and unknown, on or about March 2, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda VFR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 142**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **JON HERLONG** and others known and unknown, on or about March 8, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: James Axtman, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: 1996 Suzuki GSXR750, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 143**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **JON HERLONG** and others known and unknown, on or about March 8, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy

affecting two or more judicial circuits, to wit: the Sixth, Seventh and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Volusia and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Suzuki GSXR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 144**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **BRIAN SHEPARD**, **BRUCE SHEPARD** and others known and unknown, on or about March 12, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1990 Honda CBR1000, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Michael Dixon, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 145**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **BRIAN SHEPARD**, **BRUCE SHEPARD** and others known and unknown, on or about March 12, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1990 Honda CBR1000, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 146**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **BRIAN SHEPARD**, **BRUCE SHEPARD** and others known and unknown, on or about March 15, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Jose Tepedino, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute

## **COUNT 147**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **BRIAN SHEPARD**, **BRUCE SHEPARD** and others known and unknown, on or about March 15, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

# **COUNT 148**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **ROBERT FISHER**, **BRIAN SHEPARD**, **BRUCE SHEPARD** and others known and unknown, on or about April 2, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1991 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Bo Sigurd, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 149**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **ROBERT FISHER**, **BRIAN SHEPRD**, **BRUCE SHEPARD** and others known and unknown, on or about April 2, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1991 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 150**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ**, **RAYMOND ROGERS**, **BRIAN SHEPARD**, **BRUCE SHEPARD** and others known and unknown, on or about April 8, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1995 Honda CBR 600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Stephen Tan, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 151**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ, RAYMOND ROGERS, BRIAN SHEPARD, BRUCE SHEPARD** and others known and unknown, on or about April 8, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1995 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 152**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRIAN SHEPARD**, **BRUCE SHEPARD** and others known and unknown, on or about April 9, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Richard Montgomery, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

### **COUNT 153**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRIAN SHEPARD**, **BRUCE SHEPARD** and others known and unknown, on or about April 9, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth, Eighth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas, Alachua and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Suzuki GSXR750, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 154**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRY TANNER** and others known and unknown, on or about April 9, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Haul Trailer, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Brian Morse, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 155**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **JON HERLONG**, **JERRY TANNER** and others known and unknown, on or about April 9, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, entered or remained in a conveyance owned by or in the possession of Brian Morse, to wit: 1993 Haul Trailer, without the permission or consent of the owner or anyone authorized to act for the owner, to enter or remain in the conveyance at the time, with the intent to commit an offense in violation of Florida Statute 810.02.

# **COUNT 156**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **ROBERT FISHER, JON HERLONG, TYLER NUSBAUM, JERRY TANNER** and others known and unknown, on or about April 15, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit:

the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1993 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Terrence Clark, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 157**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **BRUCE CASNER**, **ROBERT FISHER**, **JON HERLONG**, **JERRY TANNER** and others known and unknown, on or about April 15, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1993 Honda CBR600 that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 158**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about May 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Honda CBR1000F, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Victor Baker, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 159**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about May 11, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Honda CBR1000F,

that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 160**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that MARK CEQUEIRA, MARK DAVID and others known and unknown, on or about May 14, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Honda CBR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: John Bass, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

#### **COUNT 161**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA** and others known and unknown, on or about May 14, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Honda CBR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 162**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through her undersigned designated Assistant Statewide Prosecutor, under oath, charges that **SALVADOR GINABREDA** and others known and unknown, on or about May 14, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowinly and unlawfully possess a motor vehicle, to wit: 1996 Honda CBR600, with an altered vehicle identification number, in violation of Florida Statute 319.33(1)(d).

# **COUNT 163**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about June 51, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting

two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1994 Suzuki Katana 600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Dana Baron, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 164**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about June 5, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1994 Suzuki Katana 600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 165**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about June 14, 1998 as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1997 Yamaha YZF600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Kristopher Lucas, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

# **COUNT 166**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about June 14, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1997 Yamaha YZF600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

### **COUNT 167**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about June 18, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1996 Yamaha FZR600, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: Jason Hall, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

## **COUNT 168**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about June 18, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did traffic in or endeavor to traffic in property, to wit: 1996 Yamaha FZR600, that he knew or should have known was stolen, in violation of Florida Statute 812.019(1).

## **COUNT 169**

MELANIE ANN HINES, Statewide Prosecutor for the State of Florida, by and through the undersigned designated Assistant Statewide Prosecutor, under oath, charges that **WILFREDO JIMENEZ** and others known and unknown, on or about July 10, 1998, as part of a related transaction occurring in two or more judicial circuits or in connection with an organized criminal conspiracy affecting two or more judicial circuits, to wit: the Sixth and Thirteenth Judicial Circuits of Florida, to wit: Pinellas and Hillsborough Counties, did knowingly obtain or use, or endeavor to obtain or use a motor vehicle, to-wit: 1998 Suzuki GSXR750, of a value of \$300 or more but less than \$20,000, the property of another, to-wit: James Cass, with the intent to temporarily or permanently deprive said person of a right to the property, or a benefit therefrom, or to appropriate the property to defendant's own use or to the use of a person not entitled thereto, in violation of Florida Statute 812.014.

AND said offenses being against the peace and dignity of the State of Florida.

MELANIE ANN HINES STATEWIDE PROSECUTOR STATE OF FLORIDA \_\_\_\_\_

NICHOLAS F. MOONEY Assistant Statewide Prosecutor West Florida Bureau 4211 North Lois Avenue Tampa, Florida 33614 (813) 878-7337 Florida Bar No. 0508217

# STATE OF FLORIDA COUNTY OF HILLSBOROUGH

Before me, the undersigned authority, personally appeared NICHOLAS F. MOONEY, Assistant Statewide Prosecutor, who, first being duly sworn, says that the allegations as set forth in the foregoing Information is based upon facts that have been sworn to as true and which, if true, would constitute the offenses therein charged, that the prosecution is instituted in god faith, and certifies that he has received testimony under oath from the material witness or witnesses for the offenses.

Sworn and subscribed before		
me this day of January, 1999.		
NOTARY PUBLIC		
NOTARY PUBLIC-PRINTED NAME		
Personally known to notary.		

# **DEFENDANT BIOGRAPHICAL INFORMATION**

# BRUCE CASNER White/Male DOB 12/10/65 LKA 1750 Dorchester Rd. Largo, FL 33764

# ROBERT FISHER

White/Male

DOB 11/3/75

LKA 5433 DeSoto Place Sarasota, FL

# SALVADOR GINABREDA

White/Male

DOB 2/4/73

LKA 3339 Hoover Drive Holiday, FL 34691

# JON HERLONG

White/Male

DOB 10/25/71

LKA 201 Clay Avenue Brandon, FL

# WILFREDO JIMENEZ

White/Male

DOB 7/24/72

LKA 5900Sligh Ave., #102 Tampa, FL

## RAYMOND ROGERS

White/Male

DOB 9/17/76

LKA 6016 Eureka Springs Rd.

Tampa, FL 33610

# **BRIAN SHEPARD**

White/Male

DOB 3/2/78

LKA 10101 Oak Ave.

Tampa, FL 33619

## **BRUCE SHEPARD**

White/Male

DOB 11/22/76

LKA 1833 N. Forbes Rd. #77

Tampa, FL 33565

# JERRY TANNER

White/Male

DOB 7/1/77

LKA 4208 Leonard St.

Valrico, FL

# ANTHONY HORNBECK

White/Male

DOB 2/17/69

SSN 595-10-0552

LKA 2220 Atlantic Blvd.

Jacksonville, FL

# **ANTHONY MATHEWS**

White/Male

DOB 4/13/64

LKA 811 Lake Fern Road

Lutz, FL 33549

## **SONNY PIERCE**

White/Male

SSN 365-76-0370

LKA 7848 North Fairpoint Ave. Dunellon, FL 24433

RICHARD SPATZ

White/Male

DOB 3/11/66

LKA 1927 Rainbow Dr.

Clearwater, FL 34625

# JOSEPH TIMPONE

White/Male

DOB 6/9/78

LKA 6394 Turner Camp Road

Inverness, FL 34653

# MICHAEL VINCELLI

White/Male

DOB 7/12/79

LKA 2727 W. Fletcher Ave. #581

Tampa, FL 33618

# ERIC VANDENBROAK

White/Male

DOB 11/9/66

LKA 904 Carlton Rd.

Tarpon Springs, FL

# MARK CEQUERIA

White/Male

DOB 6/29/70

LKA 800 S. Duncan Ave.

Clearwater, FL 33756

MARK DAVID

White/Male

DOB 9/4/73

LKA 800 S. Duncan Ave.

Clearwater, FL 33756

## MARCO DIAZ

White/Male

DOB 9/20/73

LKA 7409 56 Street N. #148

Tampa, FL

# JEFFREY HAMMER

White/Male

DOB 7/26/70

LKA 1025 East Lake Club Drive

Oldsmar, FL 34677

## LARRY LEDFORD

White/Male

DOB 10/16/76

LKA 224 Thorntree Place

Brandon, FL 33510

# ANTHONY LINDNER

White/Male

DOB 4/19/76

10400 Davis Rd., #57

Temple Terrace, FL 33673

# MICHAEL McDONALD

White/Male

DOB 10/21/70

LKA 2240 Morningside Drive

Safety Harbor, FL 34695

# JOSHUA MILLER

White/Male

DOB 11/9/77

LKA Hillsborough County Jail

## **TYLER NUSBAUM**

White/Male

DOB 5/7/80

DOUGLAS RYDER

White/Male
DOB 1/17/71
LKA 406 Cedar Ridge Court
Oldsmar, FL

STANLEY TURNER
White/Male
DOB 9/21/72
LKA 10922 Arden Drive
Tampa, FL

# **CIRCUIT COURT CASE NUMBERS:**

BRUCE CASNER **(A)** CRC 98-06727 CFANO-A CRC 98-06728 CFANO-A CRC 98-06729 CFANO-A CRC 98-06730 CFANO-A CRC 98-06731 CFANO-A CRC 98-06732 CFANO-A CRC 98-06733 CFANO-A CRC 98-06734 CFANO-A CRC 98-06735 CFANO-A CRC 98-06736 CFANO-A CRC 98-06737 CFANO-A CRC 98-06738 CFANO-A CRC 98-06739 CFANO-A CRC 98-06740 CFANO-A CRC 98-06741 CFANO-A CRC 98-06742 CFANO-A CRC 98-06743 CFANO-A CRC 98-06744 CFANO-A CRC 98-07444 CFANO-A CRC 98-07445 CFANO-A CRC 98-21416 CFANO-I **ROBERT FISHER (B)** CRC 98-21417 CFANO-I SALVADOR GINABREDA **(C)** CRC 98-09158 CFANO-A CRC 98-09159 CFANO-A
CRC 98-09160 CFANO-A
CRC 98-09161 CFANO-A
CRC 98-09162 CFANO-A
CRC 98-09163 CFANO-A
CRC 98-09164 CFANO-A
CRC 98-09165 CFANO-A
CRC 98-09166 CFANO-A
CRC 98-09168 CFANO-A
CRC 98-09169 CFANO-A

## WILFREDO JIMENEZ

(E) CRC 98-12791 CFANO-A CRC 98-12792 CFANO-A

# **RAYMOND ROGERS**

**(F)** CRC 98-14377 CFANO-A CRC 98-14378 CFANO-A CRC 98-14379 CFANO-A CRC 98-14380 CFANO-A CRC 98-14381 CFANO-A CRC 98-14382 CFANO-A CRC 98-14383 CFANO-A CRC 98-14384 CFANO-A CRC 98-14385 CFANO-A CRC 98-14386 CFANO-A CRC 98-14387 CFANO-A CRC 98-14388 CFANO-A CRC 98-14389 CFANO-A CRC 98-14390 CFANO-A CRC 98-14391 CFANO-A CRC 98-14392 CFANO-A CRC 98-14393 CFANO-A

#### **BRIAN SHEPARD**

(G) CRC 98-13573 CFANO-A CRC 98-13574 CFANO-A CRC 98-14357 CFANO-A CRC 98-14358 CFANO-A CRC 98-14359 CFANO-A CRC 98-14360 CFANO-A CRC 98-14361 CFANO-A CRC 98-14362 CFANO-A CRC 98-14363 CFANO-A CRC 98-14364 CFANO-A CRC 98-14365 CFANO-A CRC 98-14366 CFANO-A CRC 98-14367 CFANO-A CRC 98-14368 CFANO-A CRC 98-14369 CFANO-A

## **BRUCE SHEPARD**

(H) CRC 98-13571 CFANO-A CRC 98-13572 CFANO-A CRC 98-14370 CFANO-A CRC 98-14371 CFANO-A CRC 98-14372 CFANO-A CRC 98-14373 CFANO-A CRC 98-14374 CFANO-A CRC 98-14375 CFANO-A CRC 98-14376 CFANO-A

JERRY TANNER

- (I) CRC 98-20980 CFANO-I
- ANTHONY HORNBECK
- (J) CRC 98-20665 CFANO-I

**ANTHONY MATTHEWS** 

(K) CRC 98-20654 CFANO-I

**SONNY PIERCE** 

(L) CRC 98-20636 CFANO-I

RICHARD SPATZ

(M) CRC 98-20652 CFANO-I

**JOSEPH TIMPONE** 

(N) CRC 98-20635 CFANO-I

MICHAEL VINCELLI

(O) CRC 98-20577 CFANO-I

ERIC VANDENBROEK

(P) CRC 98-20653 CFANO-I

MARK CEQUERIA

(Q) CRC 98-20633 CFANO-I

MARK DAVID	( <b>R</b> )	CRC 98-20632 CFANO-I
MARKO DIAZ	<b>(S)</b>	CRC 98-21675 CFANO-I
JEFFREY HAMMER	<b>(T)</b>	CRC 98-20634 CFANO-I
LARRY LEDFORD	<b>(U)</b>	CRC 98-21459 CFANO-I
ANTHONY LINDNER	<b>(V</b> )	CRC 98-21689 CFANO-I
MICHAEL McDONALD	<b>(W</b> )	CRC 98-20657 CFANO-I
JOSHUA MILLER	<b>(X)</b>	CRC 98-23058 CFANO-I
DOUGLAS RYDER	<b>(Z)</b>	CRC 98-21315 CFANO-I