

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,  
IN AND FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

**Brian Christopher Dodge,**

Defendant.

**WARRANT  
TO ARREST**

IN THE NAME OF THE STATE OF FLORIDA, TO ALL AND SINGULAR THE SHERIFFS AND  
CONSTABLES OF THE STATE OF FLORIDA:

WHEREAS, Randall L. Pelham has this day made an oath before me on the 3<sup>rd</sup> day of  
November, A.D. 2011, in the County and State aforesaid:

**COUNT I  
RACKETEERING**

Defendant **Brian Christopher Dodge**, and others known and unknown, beginning on or about April 22, 2010 and continuing through December 22, 2010 in Broward County Florida, was employed by or did associate with an enterprise as defined in Section 895.02, Florida Statutes, to wit: an individual or group of individuals associated in fact, although not a legal entity, for the purpose of engaging in criminal activities, that both functioned as a continuing unit and had a common purpose of engaging in a course of criminal conduct, to wit:

- (A) Kidnapping, relating to Chapter 787, Florida Statutes
- (B) Extortion, relating to Section 836.05, Florida Statutes
- (C) Perjury, relating to Chapter 837, Florida Statutes
- (D) Official Misconduct, relating to Chapter 838, Florida Statutes
- (E) Forgery, relating to Chapter 831, Florida Statutes
- (F) Grand Theft, relating to Chapter 812, Florida Statutes

and did unlawfully, knowingly and feloniously conduct or participate in said enterprise directly or indirectly, through a pattern of racketeering activity, as that term is defined in Section 895.02, Florida Statutes, by engaging in at least two incidents of racketeering conduct that have the same or similar intent, results, accomplices, victims or methods of commission or that otherwise are interrelated by distinguishing characteristics and are not isolated incidents, including but not limited to the following incidents:

**RACKETEERING INCIDENT # 1: KIDNAPPING**

That **Brian Christopher Dodge** on or about August 24, 2010, in the County and the State aforesaid, did unlawfully and forcibly, secretly, or by threat, confine, abduct or imprison Mark Mayer against his will and without lawful authority with intent to commit or facilitate commission of a felony, to-wit: Extortion, contrary to F.S. 787.01(1)(a)2,

**RACKETEERING INCIDENT # 2: EXTORTION**

That **Brian Christopher Dodge**, on or about August 24, 2010, in the County and the State aforesaid, did unlawfully and maliciously threaten, by verbal communication, to cause injury to the person, property or reputation of another, to-wit: Mark Mayer, or to expose the said person to disgrace or to accuse the said person of a crime, such communication having been made with intent thereby to extort money or any pecuniary advantage whatsoever, or with intent to compel the said Mark Mayer, or any other person, to do any act or refrain from doing any act against his or her will, contrary to F.S. 836.05,

**RACKETEERING INCIDENT # 3: PERJURY IN AN OFFICIAL PROCEEDING**

That **Brian Christopher Dodge**, on or about December 22, 2010, in the County and the State aforesaid, did make a false statement, which the said **Brian Christopher Dodge** did not believe to be true, to-wit: how he witnessed the passenger, Nore, drop cocaine from his left hand to the floorboard of the car, which statement was under oath and in regard to a material matter in an official proceeding, to-wit: a sworn deposition in State of Florida vs. Junior Jerome, Broward County Case Number 10-15346CF10B, contrary to F.S. 837.02(1),

**RACKETEERING INCIDENT # 4: OFFICIAL MISCONDUCT**

That **Brian Christopher Dodge**, on or about August 24, 2010, in the County and the State aforesaid, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: a Probable Cause Affidavit and/or Offense Incident Report, Fort Lauderdale Police Offense Report Number 10-91720, pertaining to the arrest of Junior Jerome, contrary to F.S. 838.022(1)(a),

**RACKETEERING INCIDENT # 5: OFFICIAL MISCONDUCT**

That **Brian Christopher Dodge**, on or about August 24, 2010, in the County and the State aforesaid, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: a Probable Cause Affidavit and/or Offense Incident Report, Fort Lauderdale Police Offense Report Number 10-91720, pertaining to the arrest of Dieudson Nore, contrary to F.S. 838.022(1)(a),

**RACKETEERING INCIDENT # 6: OFFICIAL MISCONDUCT**

That **Brian Christopher Dodge**, on or about August 20, 2010, in the County and the State aforesaid, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: an Offense Incident Report and/or Evidence/Property Form, Fort Lauderdale Police Offense Report Number 10-90305, pertaining to the arrest of William Durnan and/or Anthony Rodriguez, contrary to F.S. 838.022(1)(a),

**RACKETEERING INCIDENT # 7: OFFICIAL MISCONDUCT**

That **Brian Christopher Dodge**, on or about April 22, 2010, in the County and the State aforesaid, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: an Offense Incident Report and/or Evidence/Property Form, Fort Lauderdale Police Offense Report Number 10-42520, pertaining to the arrests of Patricia Roysden and/or Glen Roysden, contrary to F.S. 838.022(1)(a),

**RACKETEERING INCIDENT # 8: OFFICIAL MISCONDUCT**

That **Brian Christopher Dodge**, on or about May 15, 2010, in the County and the State aforesaid, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: an Offense Incident Report and/or Evidence/Property Form, Fort Lauderdale Police Offense Report Number 10-51764, pertaining to the arrests of Michelle Southerland and/or Phillip Rhoads, contrary to F.S. 838.022(1)(a),

**RACKETEERING INCIDENT # 9: FORGERY**

That **Brian Christopher Dodge**, on or about August 24, 2010, in the County and the State aforesaid, did falsely make, alter, forge or counterfeit the signature of Sergeant Michael Florenco on a public record, to-wit: Offense Incident Report, Fort Lauderdale Police Offense Report Number 10-91720, pertaining to the arrests of Junior Jerome and Dieudson Nore with the intent to injure or defraud any person, contrary to F.S. 831.01,

**RACKETEERING INCIDENT # 10: GRAND THEFT**

That **Brian Christopher Dodge**, on or about August 24, 2010, in the County and the State aforesaid, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Junior Jerome, to-wit: U.S. Currency, of the value of \$300.00 or more, but less than \$5,000.00, with the intent to either temporarily or permanently deprive Junior Jerome of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014(1)(b) and F.S. 812.014(2)(c)1.,

**RACKETEERING INCIDENT # 11: GRAND THEFT**

That **Brian Christopher Dodge**, on or about August 20, 2010, in the County and the State aforesaid, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of William Durnan, to-wit: U.S. Currency, of the value of \$300.00 or more, but less than \$5,000.00, with the intent to either temporarily or permanently deprive William Durnan of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014(1)(b) and F.S. 812.014(2)(c)1.,

**RACKETEERING INCIDENT # 12: GRAND THEFT**

That **Brian Christopher Dodge**, on or about August 20, 2010, in the County and the State aforesaid, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Anthony Rodriguez, to-wit: U.S. Currency, of the value of \$300.00 or more, but less than \$5,000.00, with the intent to either temporarily or permanently deprive Anthony Rodriguez of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014(1)(b) and F.S. 812.014(2)(c)1.,

**RACKETEERING INCIDENT # 13: GRAND THEFT**

That **Brian Christopher Dodge**, on or about April 22, 2010, in the County and the State aforesaid, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Glen Roysden, to-wit: U.S. Currency, of the value of \$5,000 or more, but less than \$10,000 with the intent to either temporarily or permanently deprive Glen Roysden of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014(1)(b) and F.S. 812.014(2)(c)2.,

**RACKETEERING INCIDENT # 14: GRAND THEFT**

That **Brian Christopher Dodge**, on or about May 15, 2010, in the County and the State aforesaid, did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Michelle Southerland and/or Phillip Rhoads, to-wit: U.S. Currency, of the value of \$300.00 or more, but less than \$5,000.00, with the intent to either temporarily or permanently deprive Michelle Southerland and/or Phillip Rhoads of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014(1)(b) and F.S. 812.014(2)(c)1.,

**COUNT II: KIDNAPPING**

On or about August 24, 2010, in the County and the State aforesaid, the Defendants **Brian Christopher Dodge** did unlawfully and forcibly, secretly, or by threat, confine, abduct or imprison Mark Mayer against his will and without lawful authority with intent to commit or facilitate commission of a felony, to-wit: Extortion, contrary to F.S. 787.01(1)(a)2.,

**COUNT III: THREATS; EXTORTION**

On or about the 24<sup>th</sup> day of August, A.D. 2010, in the County and the State aforesaid, **Brian Christopher Dodge**, did unlawfully and maliciously threaten, by verbal communication, to cause injury to the person, property or reputation of another, to-wit: Mark Mayer, or to expose the said person to disgrace or to accuse the said person of a crime, such communication having been made with intent thereby to extort money or any pecuniary advantage whatsoever, or with intent to compel the said Mark Mayer, or any other person, to do any act or refrain from doing any act against his or her will, contrary to F.S. 836.05,

**COUNT IV: FALSE IMPRISONMENT**

On or about August 24, 2010, in the County and the State aforesaid, **Brian Christopher Dodge**, did unlawfully and forcibly, or by threat, confine, abduct, imprison, or restrain Bonita Liston, without lawful authority and against her will, contrary to F.S. 787.02,

**COUNT V: FALSE IMPRISONMENT**

On or about August 24, 2010, in the County and the State aforesaid, **Brian Christopher Dodge**, did unlawfully and forcibly, or by threat, abduct, imprison, or restrain Dieudson Nore, without lawful authority and against his will, contrary to F.S. 787.02,

**COUNT VI: PERJURY IN AN OFFICIAL PROCEEDING**

On or about the 22<sup>nd</sup> day of December, A.D. 2010, in the County and the State aforesaid, **Brian Christopher Dodge**, did make a false statement, which the said **Brian Christopher Dodge** did not believe to be true, to-wit: how he witnessed the passenger, Nore, drop cocaine from his left hand to the floorboard of the car, which statement was under oath and in regard to a material matter in an official proceeding, to-wit: a sworn deposition in State of Florida vs. Junior Jerome, Broward County Case Number 10-15346CF10B, contrary to F.S. 837.02(1),

**COUNT VII: OFFICIAL MISCONDUCT**

On or about the 24<sup>th</sup> day of August, A.D. 2010, in the County and the State aforesaid, **Brian Christopher Dodge**, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: a Probable Cause Affidavit and/or Offense Incident Report, Fort Lauderdale Police Offense Report Number 10-91720, pertaining to the arrest of Junior Jerome, contrary to F.S. 838.022(1)(a),

**COUNT VIII: OFFICIAL MISCONDUCT**

On or about the 24<sup>th</sup> day of August, A.D. 2010, in the County and the State aforesaid, **Brian Christopher Dodge**, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: a Probable Cause Affidavit and/or Offense Incident Report, Fort Lauderdale Police Offense Report Number 10-91720, pertaining to the arrest of Dieudson Nore, contrary to F.S. 838.022(1)(a),

**COUNT IX: OFFICIAL MISCONDUCT**

On or about the 20<sup>th</sup> day of August, A.D. 2010, in the County and the State aforesaid, **Brian Christopher Dodge**, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: an Offense Incident Report and/or Evidence/Property Form, Fort Lauderdale Police Offense Report Number 10-90305, pertaining to the arrest of William Durnan and/or Anthony Rodriguez, contrary to F.S. 838.022(1)(a),

**COUNT X: OFFICIAL MISCONDUCT**

On or about the 22nd day of April, A.D. 2010, in the County and the State aforesaid, **Brian Christopher Dodge**, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: an Offense Incident Report and/or Evidence/Property Form, Fort Lauderdale Police Offense Report Number 10-42520, pertaining to the arrests of Patricia Roysden and/or Glen Roysden, contrary to F.S. 838.022(1)(a),

**COUNT XI: OFFICIAL MISCONDUCT**

On or about the 15<sup>th</sup> day of May, A.D. 2010, in the County and the State aforesaid, **Brian Christopher Dodge**, while a public servant, an Officer for the Fort Lauderdale Police Department, with a corrupt intent to obtain a benefit for himself or another or to cause unlawful harm to another, did knowingly falsify or cause another to falsify an official record or document, to wit: an Offense Incident Report and/or Evidence/Property Form, Fort Lauderdale Police Offense Report Number 10-51764, pertaining to the arrests of Michelle Southerland and/or Phillip Rhoads, contrary to F.S. 838.022(1)(a),

**COUNT XII: FORGERY**

On or about the 24<sup>th</sup> day of August, A.D. 2010, in the County and the State aforesaid, **Brian Christopher Dodge** did falsely make, alter, forge or counterfeit the signature of Sergeant Michael Florenco on a public record, to-wit: Offense Incident Report, Fort Lauderdale Police Offense Report Number 10-91720, pertaining to the arrests of Junior Jerome and Dieudson Nore with the intent to injure or defraud any person, contrary to F.S. 831.01,



**COUNT XIII: GRAND THEFT**

On or about August 24, 2010, in the County and the State aforesaid, **Brian Christopher Dodge** did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Junior Jerome, to-wit: U.S. Currency, of the value of \$300.00 or more, but less than \$5,000.00, with the intent to either temporarily or permanently deprive Junior Jerome of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014 (1)(b) and F.S. 812.014(2)(c)1.,

**COUNT XIV: GRAND THEFT**

On or about August 20, 2010, in the County and the State aforesaid, **Brian Christopher Dodge** did then and there unlawfully and knowingly obtain or endeavor to obtain the property of William Durnan, to-wit: U.S. Currency, of the value of \$300.00 or more, but less than \$5,000.00, with the intent to either temporarily or permanently deprive William Durnan of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014 (1)(b) and F.S. 812.014(2)(c)1.,

**COUNT XV: GRAND THEFT**

On or about August 20, 2010, in the County and the State aforesaid, **Brian Christopher Dodge** did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Anthony Rodriguez, to-wit: U.S. Currency, of the value of \$300.00 or more, but less than \$5,000.00, with the intent to either temporarily or permanently deprive Anthony Rodriguez of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014 (1)(b) and F.S. 812.014(2)(c)1.,

**COUNT XVI: GRAND THEFT**

On or about April 22, 2010, in the County and the State aforesaid, **Brian Christopher Dodge** did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Glen Roysden, to-wit: U.S. Currency, of the value of \$5,000 or more, but less than \$10,000 with the intent to either temporarily or permanently deprive Glen Roysden of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014(1)(b) and F.S. 812.014(2)(c)2.,

**COUNT XVII: GRAND THEFT**

On or about May 15, 2010, in the County and the State aforesaid, **Brian Christopher Dodge** did then and there unlawfully and knowingly obtain or endeavor to obtain the property of Michelle Southerland and/or Phillip Rhoads, to-wit: U.S. Currency, of the value of \$300.00 or more, but less than \$5,000.00, with the intent to either temporarily or permanently deprive Michelle Southerland and/or Phillip Rhoads of the right to the property or a benefit from the property, or to appropriate the property to his own use or the use of any person not entitled to the use of the property, contrary to F.S. 812.014(1)(a), F.S. 812.014(1)(b) and F.S. 812.014(2)(c)1.,

**COUNT XVIII: FALSIFYING RECORDS**

On or about August 24, 2010, in the County and the State aforesaid, the Defendant **Brian Christopher Dodge**, did knowingly falsify a document, to wit: a Probable Cause Affidavit and/or Offense Incident Report, Fort Lauderdale Police Offense Report Number 10-91720, pertaining to the arrest of Junior Jerome and belonging to any public office within this State, to wit: the Fort Lauderdale Police Department, contrary to Florida Statute Section 839.13 (1),

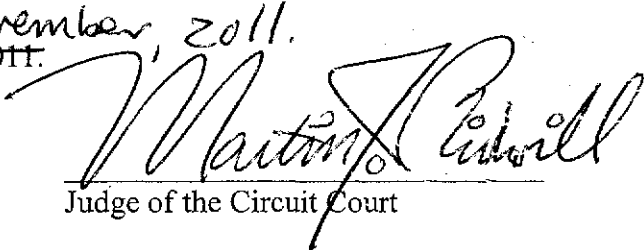
**COUNT XIX: FALSIFYING RECORDS**

On or about August 24, 2010, in the County and the State aforesaid, the Defendant **Brian Christopher Dodge**, did knowingly falsify a document, to wit: a Probable Cause Affidavit and/or Offense Incident Report, Fort Lauderdale Police Offense Report Number 10-91720, pertaining to the arrest of Dieudson Nore and belonging to any public office within this State, to wit: the Fort Lauderdale Police Department, contrary to Florida Statute Section 839.13 (1).

The offense(s) set forth in the foregoing Warrant is/are contrary to the statute(s) in such case made and provided, and against the peace and dignity of the State of Florida. Attached hereto and made a part hereof by incorporation is the Affidavit executed by, Sergeant Randall Pelham Affiant herein.

THESE ARE, THEREFORE, to command you forthwith to arrest the said **Brian Christopher Dodge**, and bring him before me to be dealt with according to law.

Given under my hand and seal this 3<sup>rd</sup> day of, November, 2011. ~~AD 2011.~~

  
Judge of the Circuit Court

**MARTIN J. BIDWILL**  
**CIRCUIT COURT JUDGE**