

Adult Def  PC Arrest  
 Juvenile Def  Application for  
Warrant/Capias

# AFFIDAVIT – COMPLAINT

Clerk's Case No. \_\_\_\_\_

SA Case No.(s) \_\_\_\_\_

PAGE 01 of 2

Agency ORI # **FL037275C**

1. Agency Name: <b>Florida Department of Corrections</b>		2. Agency Report Number: <b>23-02335</b>		3. Charge Type: <input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor <input type="checkbox"/> Misdemeanor w/associated felony <input type="checkbox"/> Municipal <input type="checkbox"/> County		3a. Ordinance Type: (If applicable)	
4. Date/Time of Offense: <b>02/07/2023 @ 1040 hrs</b>		5. Date/Time of Arrest: <b>02/07/2023 @ 1049 hrs</b>		6. Arresting Officer: <b>SI George Montenegro</b>		7. Investigating Officer: <b>Senior Inspector George Montenegro</b>	

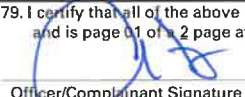
8. Defendant's Name: (Last) <b>LUNARDI</b>			(First) <b>DOMINQUE</b>			(Middle) <b>MARIE</b>			ALIAS <b>JACQUELINE SPRINGSTEAD</b>			9. OBTS:		
10. Race/Sex: <b>W/F</b>		11. Date of Birth: <b>02/07/1996</b>		12. Residence Type: <input type="checkbox"/> City <input type="checkbox"/> County <input checked="" type="checkbox"/> Florida <input type="checkbox"/> Out of State			13. Weapon Seized <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		14. Controlled Substance Seized: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No TYPE & QUANTITY: <b>Cannabis 60.90 grams</b>					
15. Height: <b>5'2"</b>		16. Weight: <b>145</b>		17. Eye Color: <b>BROWN</b>		18. Hair Color: <b>BLACK</b>		19. Scars, marks, tattoos, unique physical features: (Location, type & description) <b>Tattoos: arms, side and foot.</b>						
20. Driver's License Number/State: <b>L563-434-00629-0</b>			21. Social Security Number:			22. Residential Telephone: <b>8633088039</b>			23. Business Telephone: <b>N/A</b>					
24. Address: (Street, Apartment Number) <b>3808 FOREST PARK PLACE</b>			(City) <b>LAND-O-LAKES</b>			(State) <b>Florida</b>			(Zip) <b>34639</b>					

25. Defendant's Name: (Last)			(First)			(Middle)			ALIAS			26. OBTS:		
27. Race/Sex:		28. Date of Birth:		29. Residence Type: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Florida <input type="checkbox"/> Out of State			30. Weapon Seized <input type="checkbox"/> Yes <input type="checkbox"/> No		31. Controlled Substance Seized: <input type="checkbox"/> Yes <input type="checkbox"/> No TYPE & QUANTITY:					
32. Height:		33. Weight:		34. Eye Color:		35. Hair Color:		36. Scars, marks, tattoos, unique physical features: (Location, type & description)						
37. Driver's License Number/State:			38. Social Security Number:			39. Residential Telephone:			40. Business Telephone:					
41. Address: (Street, Apartment Number)			(City)			(State)			(Zip)					

42. Defendant's Name: (Last)			(First)			(Middle)			ALIAS			43. OBTS:		
44. Race/Sex:		45. Date of Birth:		46. Residence Type: <input type="checkbox"/> City <input type="checkbox"/> County <input type="checkbox"/> Florida <input type="checkbox"/> Out of State			47. Weapon Seized <input type="checkbox"/> Yes <input type="checkbox"/> No		48. Controlled Substance Seized: <input type="checkbox"/> Yes <input type="checkbox"/> No TYPE & QUANTITY:					
49. Height:		50. Weight:		51. Eye Color:		52. Hair Color:		53. Scars, marks, tattoos, unique physical features: (Location, type & description)						
54. Driver's License Number/State:			55. Social Security Number:			56. Residential Telephone:			57. Business Telephone:					
58. Address: (Street, Apartment Number)			(City)			(State)			(Zip)					

59. Charge Description: (# 1) <b>Unauthorized Possession of Counterfeit driver's license</b>			60. Statute or Ordinance Number: <b>F.S.S. 322.212 (1a) (Felony 3<sup>rd</sup>) (2 counts)</b>			<input checked="" type="checkbox"/> F.S. <input type="checkbox"/> Ord.		
61. Charge Description: (# 1) <b>Possession of a Controlled Substance (Cannabis/Meth)</b>			62. Statute or Ordinance Number: <b>F.S.S. 893.13(6)(a)</b>			<input checked="" type="checkbox"/> F.S. <input type="checkbox"/> Ord.		
63. Charge Description: (# 1) <b>Intro of Contraband into a Prison</b>			64. Statute or Ordinance Number: <b>F.S.S. 944.47(1)(a)(4)</b>			<input checked="" type="checkbox"/> F.S. <input type="checkbox"/> Ord.		

65. Victim's Name: (If business, list legal business name) (Last) <b>State of Florida</b>			(First)			(Middle)			66. Race/Sex		67. Date of Birth:		68. Telephone Number:	
69. Contact Person if victim is deceased, a minor child, or business: (Last)			(First)			(Middle)			70. Race/Sex		71. Date of Birth:		72. Telephone Number:	
73. Address: (Street, Apartment Number)			(City)			(State)			(Zip)			74. Secondary Phone Number:		
75. Victim Notification of Arrest: NOTIFIED BY: _____ DATE: _____ TIME: _____								76. Information Given: Victim <input type="checkbox"/> Rights Card <input type="checkbox"/> App. Info <input type="checkbox"/> Arrest Info <input type="checkbox"/> Domestic <input type="checkbox"/> Viol. Info						

77. Physical Evidence collected in this case? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Evidence Custodian's Name: <b>Inspector Magdaly Mounier</b>		78. Witness Statements taken in this case? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Person responsible for statements: <b>SI GEORGE MONTENEGRO</b>		79. I certify that all of the above information is true and correct to the best of my knowledge and is page 01 of a 2 page affidavit/complaint.  Officer/Complainant Signature		<b>George Montenegro</b> Type or print Complainant name	
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Adult Def  PC Arrest  
 Juvenile Def  Application for  
Warrant/Capias

# AFFIDAVIT – COMPLAINT (PROBABLE CAUSE NARRATIVE)

Clerk's Case No. \_\_\_\_\_

SA Case No.(s) \_\_\_\_\_

Agency ORI # **FL037275C**

80. Agency Name: <b>Florida Department of Corrections</b>	81. Agency Report Number: <b>23-02335</b>	82. Date/Time of Arrest: <b>02/07/2023 @ 1045 hrs</b>	83. Investigating Officer: <b>SI George Montenegro</b>
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84. NARRATIVE OF THE FACTUAL BASIS FOR PROBABLE CAUSE: The undersigned certifies and swears that he/she has just and reasonable grounds to believe that the heretofore named defendant did commit the violations of law as stated above and the factual basis for this belief is as follows:

**Your Affiant, Law Enforcement Senior Inspector George Montenegro (SI Montenegro), is a sworn law enforcement officer of the Florida Department of Corrections, Office of the Inspector General.**

On February 7, 2023, your Affiant and Senior Inspector Latricia Archie were at the Charlotte Correctional Institution (CCI) when Dominique Lunardi, the Defendant, entered the institution to visit an inmate using a counterfeit State of Florida identification card. At approximately 1045 hrs, a white female entered the institution to visit Inmate Joshua Moore DC# R65935 and presented a State of Florida Identification Card (S165-434-00-629-0) bearing the name Jaqueline Springstead. She identified herself as such to correctional staff and to your Affiant and Law Enforcement Senior Inspector Archie. This person was subsequently identified as Dominique Lunardi, the Defendant. Therefore the Defendant violated F.S.S. 322.212 - Unauthorized Possession of an Identification Card.

CCI Sergeant Megan Torres reported that on January 30, 2023, while reviewing censored incoming JPAY emails for inmates at CCI, she noticed an email addressed to Inmate Merritt, River DC#R87026. The sender indicated it was Dominique Lunardi using account ID # 26026493. She was previously advised by SI Montenegro that Mrs. Lunardi was a denied visitor for Inmate Moore. It appeared to her that Inmate Moore is utilizing Inmate Merritt's JPAY tablet to communicate with Mrs. Lunardi through email. Mrs. Lunardi stated in an email (Letter ID#1682995186) "I got to order contacts ASAP and makeup bc I need to make my face way whiter and I'm not sure what color I need for freckles. I'm so excited to about to see you." In letter ID# 26026493 on January 24, 2023, Mrs. Lunardi stated "I'm so stressed that I'm going to see you. I'm trying to get everything lo key ready." In an email (Letter ID: 1680288804 and ID:1680873309) Mrs. Lunardi sent Inmate Moore photographs of herself followed by an email "Please tell me what you think!!!" (Letter ID:16800873309). On January 31, 2023, at 0900 hrs, Inmate Moore had been previously approved for a visit with Jacqueline Springfield (Visitor number (FAST) # 592007265) who provided a FL driver's license# S165434006290 and a contact number of (813) 304-8039. Mrs. Lunardi did not show for her scheduled visit on January 31, 2023, but rescheduled for February 7, 2023, at 900 hrs. Following the rescheduling of her visit, Mrs. Lunardi emailed Inmate Rivers account stating that "her sister (believed to be Springstead) would not let her have it and that if she took it, she would have the cops called on her." On February 1, 2023, Mrs. Lunardi also sent a photograph of a state of Florida Identification Card with her photograph and the name Jaqueline Springstead (Letter # 1688911901).

On February 7, 2023, at approximately 10:35 a.m., your Affiant observed a white female enter the secure perimeter of CCI to begin the visitor processing with Sergeant Torres. The white female identified herself to Sergeant Torres by producing an identification card with the name Jaqueline Springstead, who was scheduled to visit with Inmate Moore. Sergeant Torres began processing "Springstead" and during a routine search of her property and person prior to visitation, Sergeant Torres felt a hard object on the Defendant's upper inner thigh. She denied possession of anything and stated it was her tampon.

On February 7, 2023, at approximately 1045 hrs, your Affiant and Senior Inspector Archie approached the white female in the visitor's search area, which is located inside the secure perimeter of the CCI. The visitor had identified herself to correctional staff as Jacqueline Springstead by using a Florida Identification Card bearing the number S165-434-00-629-0 for a visit with Inmate Moore. The Identification Card appeared to be similar to an officially issued Identification Card issued by the Florida Department of Highway Safety and Motor Vehicles. Upon further questioning during this criminal investigation, this white female continued to ascertain she was in fact Jacqueline Springstead and when confronted with her real name, Dominique Lunardi, she denied this. Finally, the Defendant indicated her true identity and she was asked to surrender any contraband, which she did to Sergeant Torres and SI Archie, in the female bathroom.

A records search of DAVID revealed that the Identification Card produced by this white female was inconsistent with the photograph of the official records in DAVID.

Sergeant Torres took possession of two packages ("bombs") wrapped in black electrical tape, one weighed 28.24 grams and the other weighed 32.66 grams. Sergeant Torres photographed, weighed and tested the green leafy substance contained inside the packages which tested positive for THC and Methamphetamines. The total packages weighed 60.90 grams package weight. The substances were secured into the evidence locker and will be prepared for submission to the Florida Department of Law Enforcement's Laboratory for analysis identification.

The Defendant provided consent to search the vehicle she drove to the institution. On the front passenger seat was her wallet and a small wallet. In the small wallet (black) was another counterfeit driver's license with the name Kimberly Lennon bearing number L550-501-77-915-0. Your Affiant had a separate incident at Hardee Correctional Institution on September 10, 2022 where the Defendant identified herself as Kimberly Lennon during a Canine Operation.

**In a sworn, Post-Miranda interview with the Defendant she invoked her Constitutional Rights.**

In summary, the above-named Defendant, Dominique Lunardi was in actual physical possession of a counterfeit Identification Card, and introduced onto the secure perimeter of CCI a scheduled controlled substance within a correctional facility, namely Charlotte Correctional Institution, where she entered to visit an incarcerated inmate. The Defendant violated Florida State Statutes 322.212, 944.47 and 893.13, specifically Possession of a counterfeit Identification Card/Introduction of Contraband (Narcotics) in a State Correctional Institution and Possession of a Controlled Substance (Marijuana/Meth).

NOTE: During this incident, one Florida driver's license and two Identification Cards were recovered, two were counterfeit and the other was the Defendant's Identification Card. Both counterfeit cards were secured as evidence in this case.

<p>85. The undersigned, being duly sworn, states that the foregoing information contained in an affidavit consisting of <u>2</u> pages is true and correct to the best of his/her knowledge</p> <p><i>[Signature]</i>          Signature of Officer/Complainant</p> <p><u>GEORGE MONTANEZ</u>          Officer/Complainant's Name (Printed)</p> <p style="text-align: right;">ID Number: <span style="background-color: black; color: black;">[REDACTED]</span></p>	<p>Sworn to and subscribed before me this <u>7</u> day of <u>February</u>, 20<u>23</u></p> <p><i>[Signature]</i>          Signature of Person Administering Oath</p> <p><input checked="" type="checkbox"/> Personally Known   <input type="checkbox"/> Other Identification   # <span style="background-color: black; color: black;">[REDACTED]</span></p> <p>ID Type: <span style="background-color: black; color: black;">[REDACTED]</span></p> <p>Seal: <span style="background-color: black; color: black;">[REDACTED]</span></p>
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87. Adult's Relation to Juvenile Defendant:		88. Adult's Name: (Last)		(First)	(Middle)
<input type="checkbox"/> Parent <input type="checkbox"/> Legal Guardian <input type="checkbox"/> Other					
89. Address: (Street, Apartment Number)		(City)	(State)	(Zip)	90. Residential Phone:
					91. Business Phone
92. Notified By: (Name)				93. Date/Time:	94. Notification Method:
					<input type="checkbox"/> Person <input type="checkbox"/> Telephone
95. Law Enforcement Disposition of Juvenile Contact: (Check one and complete release data)		<input type="checkbox"/> Transferred to Secure Detention		<input type="checkbox"/> Released to HRS Intake Officer, not detained	
Release Date: _____ Release Time: _____ Released to (Name): _____				<input type="checkbox"/> Processed within the agency and released to other than HRS	