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STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

Case Nos: 17-3119 (DOAH)
174725-15-AG
174720-15-AG

DEPARTMENT OF FINANCIAL SERVICES,

Petitioner,

v.

JEAN-ANN DORRELL and
SENIOR FINANCIAL SECURITY, INC.,

Respondents.

AFFIDAVIT IN SUPPORT OF MOTIONS TO SUPPRESS AND FOR SANCTIONS

STATE OF FLORIDA:
COUNTY OF SUMTER:

Personally appeared before me, an officer duly authorized to administer oaths and take acknowledgments, Jean Ann Dorrell, who after being duly sworn, states:

1. She is a respondent in this action and has personal knowledge of the matters contained herein.
2. She is the owner of respondent, Senior Financial Security, Inc., which has offices at 8564 CR 466, Suites 202 & 203, The Villages, Florida 32162. She is the sole officer of Senior Financial Security and has custody of its records.
3. On September 30, 2014 at approximately 11:15 a.m., she was served with the investigative subpoena attached to the motions by Ruth Williams, a special investigator with the Florida Department of Financial Services. Ms. Williams was accompanied

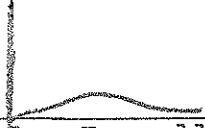
by supervisor Susan Alexander and other agents of the Florida Department of Financial Services. Upon being served the subpoena, she attempted to exercise her right to refuse to comply as provided by sec. 624.321(2), Fla. Stat. In response, Ms. Alexander screamed at her that the law required her to comply immediately. The subpoena even states "You must comply with this subpoena by producing these materials INSTANTER to Ruth Williams . . ." (Emphasis in original). Affiant attempted at least 4 times to refuse to comply with the subpoena.

4. Notwithstanding affiant's position, Ms. Williams, Ms. Alexander, and other agents interrogated the staff of Senior Financial Security in isolation, took control of the IT department at Senior Financial Security, forced Chris Azar, head of the IT department, to download information, and copied innumerable files.

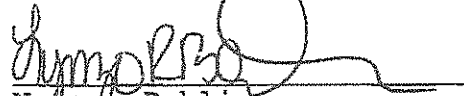
5. Ms. Williams, Ms. Alexander, and the other agents remained at Senior Financial Security downloading information and copying files until approximately 3:30 p.m.

6. At no time did affiant intend to permit enforcement of the investigative subpoena without having an opportunity to be heard in court and thereafter upon the issuance of an order appropriately requiring compliance.

FURTHER AFFIANT SAIETH NAUGHT.


Jean Ann Dorrell

Sworn to and subscribed before me on September 18, 2017
by Jean Ann Dorrell.


Notary Public

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2017 I electronically filed the foregoing with DOAH by using the ECF system which will send a notice of electronic filing to the following: David J. Busch, Esq. at david.busch@myfloridacfo.com and Marshawn Griffin, Esq. at Marshawn.griffin@myfloridacfo.com.



/s/Jed Berman

Jed Berman, B.C.S.
INFANTINO AND BERMAN
P.O. Drawer 30
Winter Park, Florida 32790
Fla. Bar #117436
Phone: 407/644-4673
Fax: 407-644-4128
jberman@infantinoberman.com

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