

IN THE SUPREME COURT OF FLORIDA

IN RE:  
STATEWIDE GRAND JURY

Case No. 09-1910

FILED  
THOMAS D. HALL

2009 OCT 19 A 10:51

CLERK, SUPREME COURT

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AMICUS CURIAE BRIEF OF JUDITH SERAPHIN,  
CEO, GLOBAL WRAP® LLC

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1. Your *amicus* is CEO and owner of Global Wrap® LLC, a small, woman-owned speciality construction service business with customers nationwide, located in historic Lincolnville in St. Augustine. Our website is [www.globalwrap.com](http://www.globalwrap.com).
2. Your *amicus* heartily agrees with Florida Governor Charles Crist and his well-founded October 14, 2009 request for a Statewide Grand Jury. *Amicus* respectfully requests that the Statewide Grand Jury scrutinize local corruption in St. Augustine, Florida and St. Johns County, where our former County Commission Chairman, THOMAS G. MANUEL, awaits sentencing on federal bribery charges.
3. Your *amicus* and her office have since 2005 reported environmental lawbreaking by the City of St. Augustine that was never prosecuted by anyone, including:
  - a. Habitual Sunshine and Open Records violations,
  - b. 40,000 cubic yards of solid waste deposited in our Old City Reservoir;
  - c. Semi-treated sewage effluent deposited in our saltwater marsh.

These criminal law violations involve environmental racism by our Nation's Oldest City, which Rev. Dr. Martin Luther King, Jr. called the "most lawless" city in America. City of St. Augustine lawbreaking has for years been blithely ignored by the State's Attorney, EPA, FBI, FDLE, FDEP and other law enforcement agencies. As Representative David Perley Lowe of Kansas said in 1871, during debate on the 1871 Civil Rights Act (a/k/a Ku Klux Klan Act):

Combinations, darker than the night that hides them...have gone unwhipped of justice. Immunity is given to crime, and the records of the public tribunals are searched in vain for any evidence of effective redress.

Monroe v. Pape, 365 U.S. 167, 175 (1961) (Douglas, J.), quoting Rep. Lowe, Congressional Globe 42nd Cong., 1st Sess., App. 166-167.


4. Your *amicus* has also reported six felonies by two former employees, which our State's Attorney for the 7<sup>th</sup> Judicial Circuit refuses to prosecute, even though St. Augustine



Police detectives presented him with a strong case, including theft by trick of \$20,000. The State's Attorney refuses to meet with me, even after I presented him with legal research at his office's request. My correspondence to the Grand Jury foreperson was never acknowledged. Our State's Attorney winks at white collar crime and corruption.

5. I respectfully request that the Statewide Grand Jury meet in the 7<sup>th</sup> Judicial Circuit and hear citizen concerns about waste, fraud, abuse, misfeasance, malfeasance, nonfeasance, obstruction of justice, Sunshine and Open Records violations by local elected and appointed public officials.
6. I respectfully request that the Statewide Grand Jury be empowered to issue indictments and presentments regarding environmental violations, waste, fraud, abuse, misfeasance, malfeasance, nonfeasance, Sunshine and Open Records violations, obstruction of justice - including the refusal of the State's Attorney's Office for the 7<sup>th</sup> Judicial Circuit to enforce laws against white collar crimes, without fear or favor.

Respectfully submitted,

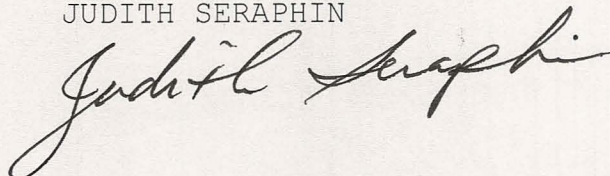


JUDITH SERAPHIN, CEO  
GLOBAL WRAP® LLC  
218 Riberia Street, Suite B  
St. Augustine, Florida 32084  
(904) 829-0808  
(904) 819-5817 (fax)

CERTIFICATE OF COMPLIANCE

I HEREBY CERTIFY that this *Amicus Curiae* Brief complies with the font requirements of Florida Rule of Appellate Procedure 9.210(a)(2).

JUDITH SERAPHIN

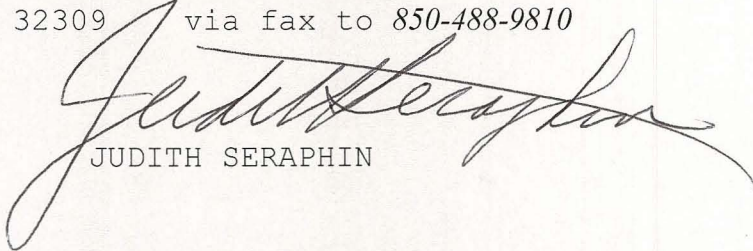


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this document was mailed October 15, 2009  
to:

Florida Supreme Court  
Attention: Clerk's Office  
500 South Duval Street  
Tallahassee, Florida 32399-1927

Honorable Charles Crist, Governor  
Honorable Robert R. Wheeler, General Counsel  
The Capitol, 400 South Monroe Street, Suite 209  
Tallahassee, Florida 32309 via fax to 850-488-9810



JUDITH SERAPHIN