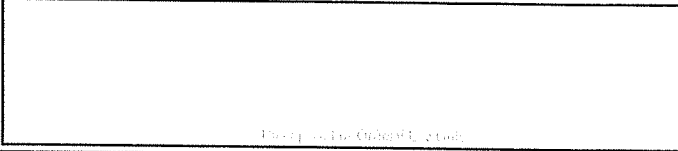


AFFIDAVIT OF COMPLAINT
STATE ELECTIONS ENFORCEMENT COMMISSION
 Revised July 2012



Please complete this form to the fullest extent possible.

The following sections are required and **must be completed in full:**

I. Identity of Complainant(s)—page 1 | III. Violation(s) Alleged—page 3 | VI. Certification—page 6

I. IDENTITY OF COMPLAINANT(S)

COMPLAINANT'S NAME

First Name Maria	MI H	Last Name Pereira	Suffix
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COMPLAINANT'S STREET ADDRESS

Address
85 Nutmeg Road

City Bridgeport	State CT	Zip Code 06610
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COMPLAINANT'S TELEPHONE NUMBER

Home	Work	Cell 203-540-9668
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COMPLAINANT'S EMAIL ADDRESS

mpereira0667@yahoo.com

COMPLAINANT'S NAME

First Name	MI	Last Name	Suffix
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COMPLAINANT'S STREET ADDRESS

Address

City	State	Zip Code
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COMPLAINANT'S TELEPHONE NUMBER

Home	Work	Cell
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COMPLAINANT'S EMAIL ADDRESS

COMPLAINANT'S NAME

First Name	MI	Last Name	Suffix
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COMPLAINANT'S STREET ADDRESS

Address

City	State	Zip Code
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COMPLAINANT'S TELEPHONE NUMBER

Home	Work	Cell
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COMPLAINANT'S EMAIL ADDRESS



II. IDENTITY OF RESPONDENT(S)

RESPONDENT'S NAME *(If known; otherwise write "unknown")*

First Name Martinez	MI	Last Name Jessica	Suffix
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RESPONDENT'S STREET ADDRESS *(If known)*

Address 50 Milne Street, Apt. # 3LR		
City Bridgeport	State CT	Zip Code 06604

RESPONDENT'S TELEPHONE NUMBER *(If known)*

Home	Work	Cell 203-923-4446
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RESPONDENT'S EMAIL ADDRESS *(If known)*

STATUTE(S) VIOLATED *(If known)*

§ 9-360, 9-361 & 9-357

RESPONDENT'S NAME *(If known; otherwise write "unknown")*

First Name Orlando	MI	Last Name Baez	Suffix
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RESPONDENT'S STREET ADDRESS *(If known)*

Address 50 Milne Street, Apt. # 3LR (LIKELY)		
City Bridgeport	State CT	Zip Code 06604

RESPONDENT'S TELEPHONE NUMBER *(If known)*

Home	Work	Cell
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RESPONDENT'S EMAIL ADDRESS *(If known)*

STATUTE(S) VIOLATED *(If known)*

§ 9-360, 9-361 & 9-357

RESPONDENT'S NAME *(If known; otherwise write "unknown")*

First Name	MI	Last Name	Suffix
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RESPONDENT'S STREET ADDRESS *(If known)*

Address		
City	State	Zip Code

RESPONDENT'S TELEPHONE NUMBER *(If known)*

Home	Work	Cell
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RESPONDENT'S EMAIL ADDRESS *(If known)*

STATUTE(S) VIOLATED *(If known)*

§

*Copy and attach page(s) for additional respondents if necessary.
 Please check "See attached Additional Respondent List" and list the number of pages.*

See attached _____ Additional Respondent List pages
Number of Pages



III. VIOLATION(S) ALLEGED

DATE(S) OF ALLEGED VIOLATION(S) (If known)

Tuesday, July 23, 2019, Tuesday, September 10, 2019 & Tuesday, November 5, 2019

CONCISE STATEMENT OF FACTS

Please be as specific as possible with regard to time, place, and the individual(s) taking actions or failing to act, and in describing their actions as well as other witnesses or persons involved. If applicable, please clearly refer to the names of identified respondents, witnesses, and attached evidence (e.g., See Evidentiary Attachment B.). If you have identified more than one respondent, please identify which respondent is alleged to have committed which action and which specific alleged violation of the statutes.

If you are unable to provide the specific identity of any witnesses in the following “**Witnesses**” section, please provide as much identifying information as possible in the below “**Concise Statement of Facts.**”

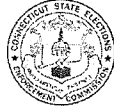
The respondent(s) allegedly violated the law as follows:

Jessica Martinez currently serves as both Chair of the Bridgeport Board of Education (BBOE) and as a member of the 137th District Democratic Town Committee (DTC). She was elected to the 137th DTC in both 2016 & 2018 and was elected to the BBOE in 2017. She served as Treasurer of the Dennis Bradley 23rd Senatorial Campaign in 2018 and is part of that ongoing investigation in which I filed an SEEC complaint. She is also closely aligned with Bridgeport Board of Education Member Chris Taylor whom is also being investigated by the SEEC based on a SEEC complaint I filed asserting he is serving on the BBOE illegally as he is a resident of Southport, CT. Orlando Baez is Jessica Martinez' significant other and does not hold municipal office nor is he a member of the DTC.

On January 9, 2019, the CT Post published an article highlighting that the numerous criminal charges Jessica Martinez was facing were dismissed after she plead guilty to a number of crimes, & successfully completed a Domestic Violence Program. Senator Dennis Bradley represented Jessica Martinez in those criminal matters. Orlando Baez was also arrested and charged, and his charges are still pending. I strongly urge the SEEC to contact the Stratford & Bridgeport Police Departments to gain access to all the police reports, files and court records as these will provide critical information regarding residency for both Martinez & Baez.

*Use attached page(s) for additional statement of facts if necessary.
Please check “See attached Additional Statement of Facts” and list the number of pages.*

See attached 3 Additional Statement of Facts pages
Number of Pages



ADDITIONAL STATEMENT OF FACTS

Page 2 of 4

CONCISE STATEMENT OF FACTS *continued*

I have been highly suspicious of Jessica Martinez' residency in the 137th District since April 2019. In April 2019 Jessica Martinez called me regarding her sons schooling. She sounded quite frazzled and frantic and asked for my advice regarding a Control Transfer for her son. She went onto explain that she had withdrawn her son from Notre Dame due to finances and that he had not been enrolled in any school for two weeks. She further stated that although his neighborhood high school was Bassick High School she wanted her son to attend Central High School. Although I did not share it with her, in my mind red flags were immediately raised as I knew that any high school student residing in the 137th District would automatically be assigned to the neighborhood school of Warren Harding High School, therefore if her son's neighborhood school was Bassick H.S. he could not possibly be residing in the 137th District. I set about quietly trying researching Jessica Martinez' residency, however I was unable to find any indisputable evidence to support my suspicions. I was told that her son was residing with his father while Jessica & Jose Martinez were in the midst of a divorce, therefore I did not pursue the matter at that time.

The January 9, 2019 CT Post article also referenced Jessica Martinez was facing an eviction and I knew those records were public. After researching Jessica Martinez' eviction I was able to locate the complaint, a copy of her lease, text messages, her pro-se appearance and more. On November 6, 2019, Attorney Daniel Arcobello filed an eviction due to non-payment of rent against Jessica Martinez on behalf of Stone Bridge Properties after a Sheriff served Jessica Martinez on October 11, 2019 with a Notice to Vacate by October 24, 2019. Jessica Martinez failed to vacate her apartment by the deadline. The address Jessica Martinez is being evicted from is 50 Milne Street, Apt. 3LB. The address is located in the Hollow section of Bridgeport in the 131st District which requires she vote at City Hall located at 45 Lyon Terrance. A copy of the lease states she signed the lease on April 3, 2019, well before the July 23, 2019 DTC Convection, September 10, 2019 Primary and November 5, 2019 General Election.



ADDITIONAL STATEMENT OF FACTS

Page 3 of 4

CONCISE STATEMENT OF FACTS *continued*

Jessica Martinez failed to appear for two separate court dates, therefore the plaintiff prevailed and she was ordered to vacate or be removed by a Marshal. On January 7, 2019, Jessica Martinez filed a Pro-se appearance, and numerous additional documents in her own handwriting with 6 of those documents being signed by her and 4 of those documents identifying her address as 50 Milne Street, Apt. # 3LR directly below her signature. One of these documents was a "Motion to Squash Execution" stating stating in part that "the defendant has no other safe, adequate, and affordable place to live and/or cannot move before the date set for eviction" which would contradict any attempt by Jessica Martinez to now claim any other residency in the 137th District. As of November 5, 2019, neither Jessica Martinez nor Orlando Baez had changed their voter registration from 761 Noble Avenue located in the 137-01 Precinct of Luis Munoz Marin School to their proper residence(s). On Tuesday, July 23, 2019, Jessica Martinez attended the Democratic Town Committee Convention as the 137th District Town Committee and participated in nominating in a BBOE candidate, cast a vote for Joe Ganim for Mayor and voted to endorse Aidee Nieves and Maria Valle to serve as the 137th City Council candidates although she clearly had no right to do so. Once she moved to 131st District in April 2019 she had vacated her 137th District Town Committee seat and could no longer represent Democrats residing in the 137th District. Furthermore, on both September 10, 2019 and November 5, 2019 Jessica Martinez voted in the Democratic Primary and the General Election in the 137th District at Luis Munoz Marin School when she was required to vote in the 131st District at City Hall located at 45 Lyon Terrace. In September 2014, then State Representative Christina Ayala was arrested and charged with several crimes that it appears both Board of Education Chair Jessica Martinez and her significant other Orlando Baez may have committed, although Jessica Martinez' alleged criminal violations are more significant and extensive.



ADDITIONAL STATEMENT OF FACTS

Page 4 of 4

CONCISE STATEMENT OF FACTS *continued*

Should the SEEC find these allegations to be true I am urging the SEEC to refer this matter to the Chief State Attorney for criminal

prosecution so that both Jessica Martinez and Orlando Baez can be charged with at minimum the following felony counts:

- General Statute 9-360 - for fraudulently voting in an election or primary which they were not eligible to vote.

- General Statute 9-361- for unlawfully voting in a primary in which they were not eligible to vote

- General Statute 9-357- for fraudulently procuring themselves to be electors

In addition, Jessica Martinez should be charged with any relevant crimes for illegally serving on the 137 Democratic Town

Committee and nominating, endorsing and voting for city wide and 137District candidates at the Democratic Convention held

on Tuesday, July 23, 2019 when she had no legal authority to do so.

As you are aware, a number of elected and appointed municipal officials, DTC members and campaign operatives in

Bridgeport have been found guilty of betraying the people's trust, voter, elections and absentee ballot fraud which has

resulted in prison sentences, fines, and penalties. Clearly, that has not been enough to curtail illegal behavior.

However, the vast majority of Bridgeport residents believe our elected/appointed officials and DTC members should demonstrate

the highest level of integrity, honesty, morals, values and principles as representatives of the people. And, when those

expectations and standards are not upheld there must be accountability. We can no longer tolerate or accept those who make a

mockery of our democracy and democratic principles, or trample on the belief that public service is ingrained in the principle of

what is in the best interest "of the people, by the people, for the people."