

IN THE CIRCUIT COURT OF THE  
15TH JUDICIAL CIRCUIT IN AND FOR  
PALM BEACH COUNTY, FLORIDA

WAYNE ROTHBAUM,

Plaintiff,

v.

GEORGE WRIGHT, Individually, and  
JOSEPH ABRUZZO in his official capacity  
as the Clerk and Comptroller of the Circuit  
Court, Palm Beach County, Florida,

Defendants.

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**AFFIDAVIT OF GREGORY LIRETTE**

STATE OF Florida

COUNTY OF Alachua

**GREGORY LIRETTE**, being duly sworn, deposes and says:

1. I am a online notarization specialist who provides remote online notary services. I have personal knowledge of the facts set forth in this affidavit.
2. On August 21, 2024, I was made aware that a document purporting to show my notarization and listing myself as the person who allegedly prepared a forged deed that has been recorded in Palm Beach County, Florida. A copy of this forged deed is attached hereto as **Exhibit 1** and is referred to herein as the “Forged Deed”.
3. I had no part in preparing or notarizing the Forged Deed.
4. Wayne Rothbaum (or “Wane [sic] Rothbaum” as it is shown on page 3 of the Forged Deed) never appeared before me to sign the Forged Deed.
5. George Wright never appeared before me to sign the Forged Deed.
6. Neither of the named “witnesses” to this document had communication with me regarding this Forged Deed.
7. If I had any communication with the people listed in this deed it was unrelated to the deed in question. As of today, I am not aware of any communications I had with any of the signers although it is possible communication existed.
8. It is my sincere belief that this deed was forged by someone not in the United States.

9. In fact, prior to August 21, 2024, I had never seen this Forged Deed.
10. The Forged Deed fails to comply with the Florida requirements for a proper notarization.
11. While the Forged Deed lists my name and certain information associated with my notary business, this document has multiple signs of its fraudulent nature. For example:
  - a. The signature I use on notarized documents differs significantly from the signature alleged to be my signature on the Forged Deed. This is evidenced by the different signature shown below on the signature line of this affidavit (as compared to the signature shown on the Forged Deed).
  - b. The notary seal shown on the Forged Deed does not reflect my notary seals. I would also never put
  - c. The fake seal says “active in Pinellas County” I would never have a seal that limits me to Pinellas County
  - d. With as much room as the document has on it, my signature would be next to the seal, very close and my name below my signature in accordance with Florida law.
  - e. The third page of the Forged Deed is a separate notary acknowledgement. In my practice as a notary, I do not include a separate notary acknowledgement page attached to notarized forms.
  - f. The separate notary acknowledgement page of the Forged Deed misspells the alleged Grantor’s name.
  - g. The separate notary acknowledgement page of the Forged Deed states that two individuals personally appeared “virtually/in person” without selecting either option. “Virtually” is also an incorrect term for online notarizations.
  - h. The separate notary acknowledgement page of the Forged Deed has a DocuSign envelope header even though no other page contains this same header and even though the Forged Deed purports to have been signed in hard copy with a physical stamp. I also do not use DocuSign in any of my notarizations.
  - i. DocuSign although being a valid online notary platform in the state of Florida as far as I am aware requires \$5,000 to sign a contract with them. This does not include the costs of doing notarizations. In my experience every notarization I have seen that was done on DocuSign is fraud and furthermore although it may or may not be legal to notarize a document previously electronically signed on DocuSign, I have a policy in which my documents only reflect DocuSign if it is the subject of the document and that has happened recently.
  - j. I do not use loose leaf’s unless there is no room in the document. A loose leaf is an additional page added to include the notarial certificate. I am very specific about

my loose leaf in the event I must use them, and I create them custom for the document to look very clean and neat. This document does not come close to my quality bar, and I would have refused to use it.

- k. This very document I have written, this instant document “AFFIDAVIT OF GREGORY LIRETTE” contains a notarial certificate similar to the one I would have used. Furthermore, the notarial certificate would have been on the same page as the signatures.
- l. Regarding the notary seal for an online session, this very document I have written, this instant document “AFFIDAVIT OF GREGORY LIRETTE” contains a notarial seal similar to the one I usually use online, there are only 3 notaries I am personally aware of (all in Florida) that have fully customized notaries seals. The notary on this instant document Jennifer Avis seal was created based on my seal. It is branded NotaryGeek.net and has a custom logo, the seal design itself is only used by Jennifer Avis and me and was created for us by a graphic designer. I do on rare occasion if I get a specific request to not making it glaring obvious that it was done online, I will use the words “online” in the notary certificate but on a warranty deed such as this I would never allow the customer to pick that option, they did not like my seal I would refuse their business. Online notarizations are specially allowed in Florida so my custom seal would be no issue.
- m. Regarding the notary seal for an in-person session. I am the only notary in the United States that I am personally aware of that has a fully designed from scratch in person notary seal. This design is the same as my online seal except the words “online notary” are removed and it was provided to me by the same graphic designer. I do also have other in person notary seals but none of them come close to resembling the one used on the document in question.
- n. Although I have allowed it in the past, in 2024 I would no longer have allowed the witnesses to be outside of the United States. If this was done online, which would have to have been with the foreign witnesses I would have used either another Florida notary as the witness or a person interested in becoming an online notary. I have a pool of a very small number of people I use as a witness, and I am very aware of the small possibility of needing to testify in court and I take this into consideration especially on a warranty deed.
- o. Unless the customer insisted on 2 separate witnesses I would have personally served as one of the witnesses as this is a document witness. In the event there were 2 separate witnesses, and I was not one of them. I would have noted this in the notarial certificate but if I served as only a document witness, I would not have noted the witnesses in my notarial certificate.
- p. Signatures appear to be done in person and they are too perfect in any case.
- q. I usually ask the customer if they want their name under the signature which 100% of the time they do, but the name is directly below the signature and not on the same line as the address usually, the goal is to be very clear.

- r. On warranty deeds I am always concerned about pushback and document rejection. They are one of the only situations in which the video has been requested. I do not give the customers an option to not have my notarize on the same page as the signature. The small amount of money I get from the customer is not worth the follow up work when a document comes into question, and I do not allow the customer or the signer to dictate how I notarize.
- s. This fraud document has a poor attempt at the California required item that starts with “I certify under penalty of perjury under the laws of the State of California (CA) “however, in this document they put U S A. This makes it obvious to me that this was almost certainly done overseas. While I have notarized documents before with this CA requires text, it is CA specific to the notary and not required for a notary in any other state as far as I am aware. I do not like to put myself under the penalty of perjury unnecessarily and as such I typically remove that line in my notarial certificates.
- t. This loose-leaf notarial certificate too sloppy and confusing for me to have used it, I would have refused to notarize it as it is.
- u. My loose leaf if used are created on the fly by me using a new Microsoft Word document or I might use one with my own branding including website but never someone else’s branding or one downloaded such as this one.
- v. To date I have never created a document to the best of my knowledge that says, “prepared by” and includes my name.
- w. My documents are extremely clear if they were done online or in person. In fact, my notary seal online is custom and includes the text “online notary” but I go above and beyond online and use this exact text in most situations but no doubt on a warranty deed my text would include “Notarized online by means of audio-video communication technology”.
- x. If done in person had I used document which I do not like I would have stamped it with a custom stamp that includes the notarial act and printed to the effect that it was done in physical presence. In the event I did not have that stamp handy I would have marked in writing in “done in person” it would not have been enough for me to circle the text already on this document.
- y. I have serious concerns that this scammer had a physical stamp created and stamped this document with a physical stamp.
- z. “Known to me personally or proven to me through satisfactory evidence” which is used in the document in question, and I find fault with that statement. This wording is even used in Florida state documents to become an online notary and it’s my stance that the language does not comply with Floria law “117.05 Use of notary commission; unlawful use; notary fee; seal; duties; employer liability; name change; advertising; photocopies; penalties.— ‘ under (f) The specific type of

identification the notary public is relying upon in identifying the signer, either based on personal knowledge or satisfactory evidence specified in subsection (5). I refuse to use that language as it is either or and does not meet “The specific type of identification the notary public is relying upon in identifying the signer” If I leave that language in, I make a very clear call out written out for what the actual ID was. I state the passport country and if it’s foreign passport I say that the signer was not inside the United States as few to no passports have the required stamp on them and I am not authorized to accept a non-U.S. passport unless they are not inside the U.S., or I state the specific state of the ID. If it is a CDL for example I usually do not say driver license but rather CDL. In any case the ID type or how I identified them is clearly spelled out. Even if I am vague because the person does not have a driver license, I copy and paste the exact text from the law. It’s always very clear what the ID presented was or that they are personally known in the case I know the signer well enough.

aa. My statement today does not point out every flaw I see nor is it intended to. The document in question is an obvious fake or in other words an obvious fraudulent document.

FURTHER AFFIANT SAYETH NAUGHT.



GREGORY LIRETTE

State of Florida  
County of Alachua, ss.

Sworn to and subscribed to before me on this the 23rd day of August 2024 by Gregory Lirette who is personally known to this notary. Notarized online by means of audio-video communication technology.



Jennifer Lee Avis