## IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

BEACH ENTERTAINMENT FL LLC, CASE NO.: 24-3782-C
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Plaintiff,

VS.

PHILLIP ANDRE ROURKE, JR.,

Defendant

## AFFIDAVIT OF WITNESS WILLIAM CRIEGO

COMES NOW the Affiant: William Criego, who affirms that the following is true and correct under penalty of perjury and fraud:

- I am an Executive Producer and financier on the film MOTHER NATURE AND
  THE DOOMSDAY PREPPER. Laurie Criego and I loaned Beach Entertainment
  FL LLC the funding to produce the feature film.
- 2. When Micky Rourke's agent submitted him for the role of "Zeus" I had a meeting with our team and we discussed the great benefit of having an actor of Rourke's stature on our independent film. I strongly believed this would almost ensure that we would be able to sell our project. Laurie Criego and I agreed to finance a large increase in the budget to accommodate his pay and approved the hiring of Phillip Andre Rourke (aka Mickey Rourke) as an actor to play the role of "Zeus" for the feature film "Mother Nature and the Doomsday Prepper."
- 3. Laurie Criego and I advanced \$25,000 to Mr. Rourke upon signing the contract.
- 4. Production on the film stopped due to Defendant breaching the Contract
- 5. Laurie Criego and I have incurred the following out-of-pocket expenses due to the Defendant's breach of the Contract and we have not yet received our money back:

Security Deposit paid on 1/25/24. Refund requested on 3/11/24	\$25,000
and 3/20/24	
Mickey and Dmytro - flights refunded to their personal airline	\$5,604.00
accounts	
Hines - flight-refunded to her personal airline account	\$1,101.76
Natalia Kovalenko - flight refunded to her personal airline account	\$2,385.56
Non-refundable limo deposit for transportation to and from set	\$134.00
Talent flight changes	\$3,758.75
Additional Per Diem for lost filming days x5 talent	\$350.00
Legal fees for addendum draft – sent the night of 3/4/24, expecting	\$700.00
Mickey would sign it based on earlier e-mails	
Not charged for extra walkie rental day	\$0.00
Never charged for hotel rooms	\$0.00

I understand that under penalty of perjury and fraud, the above statements are true and correct. FURTHER AFFIANT SAYETH NOT. William Criego I hereby set my hand and my seal. AFFIANT: WILLIAM CRIEGO STATE OF NEW YORK) COUNTY OF ESSEX Sworn to and subscribed before me by means of \_\_\_\_\_ physical presence or \_\_\_\_\_, by WILLIAM CRIEGO, who is online notarization, on personally known personally known to me or produced XXXXXXXXXXXXXXXXX identification X Jennifer Langworthy SIGNATURE OF NOTARY PUBLIC (NOTARY SEAL) Name of Notary Public JENNIFER LANGWORTHY Notary Public for the State of New York
Qualified in Essex County
My Commission Expires Nov. 13, 2027 My commission expires:\_\_