

2021CF9329 AX

STATE OF FLORIDA
DEPARTMENT OF FINANCIAL SERVICES
DIVISION OF PUBLIC ASSISTANCE FRAUD

AFFIDAVIT OF COMPLAINT

County of
Palm Beach

DFS CASE NUMBER:
PB-90-51909
DCF CASE NUMBER:
1002130069

NAME(S) Christina Powery

SOCIAL SECURITY NO: DOB: February 9, 1987

RACE: White SEX: F HEIGHT: 5'2" WEIGHT: 165 lbs. HAIR: Brown EYES: Brown

LAST KNOWN ADDRESS 7514 75th Way, West Palm Beach, Florida 33407

OTHER COMMENTS Florida Driver License Number: P600-100-87-549-0

Before me, personally appeared **Vincent Esposito**, Investigator, Florida Department of Financial Services, Division of Public Assistance Fraud, who first being duly sworn, deposes and says that he has reason to believe that: **Christina Powery** on various days between the **4th day of January 2019** and the **31st day of July 2019**, in **Palm Beach County**, State of Florida, did knowingly, by means of a false statement, misrepresentation, impersonation, or other fraudulent means fail to disclose a material fact used in making a determination as to her qualification to receive aid or benefits under a state or federally funded assistance program; or did knowingly fail to disclose a change in circumstances in order to obtain or continue to receive aid or benefits under such a program in an amount larger than that to which she was entitled; or did knowingly aid and abet another person in the commission of any such act, contrary to the provisions of Section 414.39(1), Florida Statutes; specifically:

Records of the Florida Department of Children and Families (Department) reflected that on or about January 4, 2019 and June 11, 2019, during reviews of her eligibility to receive public assistance, **Christina Powery** reported she was currently employed by Ozment Law, P.A., earning between \$1,200.00 and \$1,300.00 bi-weekly and submitted Verification of Employment, Loss of Income forms reflecting earnings of \$1,140.00 bi-weekly from Ozment Law, P.A.

Records further reflect that during her eligibility phone interview on January 18, 2019, **Christina Powery** reported her employment by Ozment Law earning \$15.00 per hour and working 38 hours per week.

Furthermore, during the aforementioned reviews of eligibility, **Christina Powery** acknowledged that the reported information is true to the best of her knowledge and acknowledged her responsibility to report any changes in her household.

(Witness 1; Enclosures A through B-3)

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INVESTIGATION REVEALED CHRISTINA POWERY:

- Was, in fact, employed by Ozment Law, P.A., from June 14, 2010 through July 19, 2019.
- Received her first pertinent paycheck on January 11, 2019 and her last paycheck on July 26, 2019; earning total gross wages of \$26,020.96 during this period.
- Failed to report her true and correct income from her employment by Ozment Law, P.A., during the period of January 18, 2019 through July 19, 2019.
- Received actual bi-weekly gross earnings between \$1,615.38 and \$1,890.38, during the period of January 11, 2019 through July 12, 2019 and a final check of \$1,230.64 on July 26, 2019.
- Submitted to the Department, Verification of Employment/Loss of Income forms which were false, in that she reflected lesser gross wages than her actual earned gross wages and she forged the signature of her employer.
- Made false statements during her January 4, 2019 and June 11, 2019 eligibility review processes.

(Witnesses 3 and 4; Enclosures C through E)

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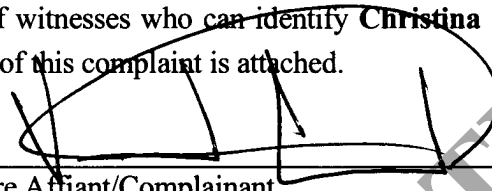
CONCLUSION:

Christina Powery, by means of false statements and/or omissions, failed to report her true and accurate income by Ozment Law, P.A., to the Florida Department of Children and Families, during the period of January 18, 2019 through July 19, 2019.

As a result of her actions, **Christina Powery** received \$1,616.00 in Food Assistance Program benefits during the period of January 2019 through July 2019 to which she was not legally entitled. In addition, **Christina Powery** received or caused the disbursement of \$718.78 in Medicaid Program benefits during the period of February 2019 through June 2019; for an aggregate amount of \$2,334.78 to which she was not legally entitled.

(Witness 2, Enclosure F)

A list of witnesses who can identify **Christina Powery** and present testimony and documents in support of this complaint is attached.



Signature Affiant/Complainant

State of Florida

County of Palm Beach

Sworn to and subscribed before me

this 25 day of

Feb

, A.D. 2021 by

Vincent Esposito

(name of person(s) acknowledged)

who is/are personally known to me and did take an oath.

Signature 

Type or Print Name

Nick Goodsell

Title Notary Public

My Commission Expires:

