

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

AFFIDAVIT OF COMPLAINT

County of
Palm Beach

DFS CASE NUMBER:
PB-90-51212
DCF CASE NUMBER:
1292530367

NAME(S) Mary Grace Cadelina Baldonado

SOCIAL SECURITY NO. DOB May 11, 1978

RACE Asian SEX F HEIGHT 5'3" WEIGHT 150 lbs. HAIR Orange EYES Brown

LAST KNOWN ADDRESS 5606 Barnstead Cir, Lake Worth, FL 33463

OTHER COMMENTS Florida Driver License Number: B435-543-78-671-0

Before me, personally appeared **Connor Davey**, 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: **Mary Grace Baldonado**, on various days between the **6th day of June 2018** and the **31st day of December 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) reflect that on or about June 6, 2018, during a review of her eligibility to receive public assistance, **Mary Grace Baldonado**:

- Reported that she was not currently employed.
- Reported that Alvin Baldonado, Date of Birth: April 29, 1970, Social Security Number: , resided in her household.
- Reported that Alvin Baldonado was currently employed at Delray Dunes Golf and Country Club earning \$200.00 weekly and submitted a Verification of Employment/Loss of Income form to the Department reflecting his wages received between \$221.00 and \$299.00 weekly.
- Reported that there was no other earned income available to her household.

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CASE NAME: **Mary Grace Baldonado**
DFS CASE NUMBER: PB-90-51212
DCF CASE NUMBER: 1292530367
Affidavit, continued Page 2

Records of the Department reflect that on or about January 17, 2019, during a review of her eligibility to receive public assistance, **Mary Grace Baldonado**:

- Reported that Alvin Baldonado, Date of Birth: April 29, 1970, Social Security Number: [REDACTED], resided in her household.
- Reported that Alvin Baldonado was currently employed at Delray Dunes Golf and Country Club earning \$150.00 weekly.
- Reported that there was no other earned income available to her household.

Records of the Department reflect that on May 1, 2019, **Mary Grace Baldonado** submitted a Change Report reflecting that she had no current employment and past employment by PAYCHEX PEO II LLC with an end date of April 30, 2019. Furthermore, she reported past employment for Alvin Baldonado from Delray Dunes Golf and Country Club with an end date of February 24, 2019.

Records of the Department reflect that on or about May 1, 2019, during a review of her eligibility to receive public assistance, **Mary Grace Baldonado**:

- Reported that she was not currently employed and past employment by PAYCHEX PEO II LLC with an end date of April 30, 2019.
- Submitted a Verification of Employment/Loss of Income form to the Department reflecting she was no longer employed by GSKY Plant Systems.
- Reported that Alvin Baldonado, Date of Birth: April 29, 1970, Social Security Number: [REDACTED], resided in her household.
- Reported past employment from Delray Dunes Golf and Country with an end date of February 24, 2019.
- Submitted a Verification of Employment/Loss of Income form to the Department reflecting Alvin Baldonado was no longer employed by Delray Dunes Golf and Country Club.
- Reported that there was no other earned income available to her household.

Records of the Department reflect that on or about August 13, 2019 during a review of her eligibility to receive public assistance, **Mary Grace Baldonado**:

- Reported having no current employment or earned income available for her household.

CASE NAME: **Mary Grace Baldonado**
DFS CASE NUMBER: PB-90-51212
DCF CASE NUMBER: 1292530367
Affidavit, continued Page 3

Furthermore, during the aforementioned review processes, **Mary Grace Baldonado** 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 and 3 through 5; Enclosures A through E-2)

INVESTIGATION REVEALED THAT MARY GRACE BALDONADO:

- Was in fact, employed by GSKY Plant Systems Inc. from February 28, 2018 through at least January 31, 2019.
- Received her first pertinent paycheck on May 31, 2018 and her last pertinent paycheck on January 30, 2019, earning total gross wages of \$28,668.00 during this period.
- Failed to report her gainful employment from GSKY Plant Systems Inc., to the Florida Department of Children and Families, during the period of June 6, 2018 through January 30, 2019 when the Department became aware of this employment and earned income.
- Made false statements during her June 6, 2018 and January 17, 2019 eligibility review processes.

INVESTIGATION ALSO REVEALED THAT MARY GRACE BALDONADO:

- Was in fact, employed by Maplebear Inc. doing business as Instacart from March 20, 2019 through at least December 31, 2019.
- Received her first paycheck on May 17, 2019 and her last pertinent paycheck on December 6, 2019, earning total gross wages of \$8,493.70 during this period.
- Failed to report her gainful employment from Maplebear Inc. doing business as Instacart, to the Florida Department of Children and Families, during the period of March 20, 2019 through December 31, 2019.
- Made false statements during her May 1, 2019 and August 13, 2019 eligibility review processes.

CASE NAME: **Mary Grace Baldonado**
DFS CASE NUMBER: PB-90-51212
DCF CASE NUMBER: 1292530367
Affidavit, continued Page 4

INVESTIGATION ALSO REVEALED THAT MARY GRACE BALDONADO:

- Was in fact, employed by Publix Super Markets, Inc. from June 15, 2019 through at least December 31, 2019.
- Received her first paycheck on June 27, 2019 and her last pertinent paycheck on December 26, 2019, earning total gross wages of \$5,593.72 during this period.
- Failed to report her gainful employment from Publix Super Markets, Inc., to the Florida Department of Children and Families, during the period of June 15, 2019 through December 31, 2019.
- Made false statements during her August 13, 2019 eligibility review process.

INVESTIGATION ALSO REVEALED THAT:

- Alvin Baldonado, Date of Birth: April 29, 1970, Social Security Number: [REDACTED], was in fact, employed by Delray Dunes Golf and Country Club Inc. from August 7, 2012 through February 28, 2019.
- Received his first pertinent paycheck on May 30, 2018 and his last paycheck on February 27, 2019; earning total gross wages of \$17,047.04 during this period.
- Received actual weekly gross earnings ranging between \$338.71 and \$1,000.00 during the period of May 30, 2018 through February 27, 2019.
- **Mary Grace Baldonado** was aware of this employment and failed to report his true and accurate income from his employment by Delray Dunes Golf and Country Club Inc. during the period of June 6, 2018 through February 28, 2019.
- **Mary Grace Baldonado** submitted to the Department, paystubs which were false, in that she reflected lesser gross wages than his actual earned gross wages.
- **Mary Grace Baldonado** made false statements during her June 6, 2018 and January 17, 2019 eligibility review processes.

(Witnesses 6 through 16; Enclosures F through M)

CASE NAME: **Mary Grace Baldonado**
DFS CASE NUMBER: PB-90-51212
DCF CASE NUMBER: 1292530367
Affidavit, continued Page 5

CONCLUSION:

Mary Grace Baldonado, by means of false statements and/or omissions, failed to report to the Florida Department of Children and Families, her gainful employment from GSKY Plant Systems Inc. during the period of June 6, 2018 through January 30, 2019 at which time the Department became aware of this employment, failed to report her gainful employment from Maplegear Inc., doing business as Instacart, during the period of March 20, 2019 through December 31, 2019, failed to report her gainful employment from Publix Super Markets, Inc. during the period of June 15, 2019 to December 31, 2019, and failed to report Alvin Baldonado's true and correct income from his employment by Delray Dunes Golf and Country Club during the period of June 6, 2018 through February 28, 2019.

As a result of her actions, **Mary Grace Baldonado** received \$6,493.00 in Food Assistance Program benefits during the period of July 2018 through December 2018 and June 2019 through December 2019 to which she was not legally entitled. Additionally, **Mary Grace Baldonado** received or caused the disbursement of \$5,308.62 in Medicaid Program benefits, during the period of June 2018 through February 2019 and June 2019 through December 2019; for an aggregate amount of \$11,801.62 to which she was not legally entitled.

(Witness 2; Enclosure N)

A list of witnesses who can identify **Mary Grace Baldonado** and present testimony and documents in support of this complaint is attached.


Signature Affiant/Complainant

State of Florida
County of Palm Beach

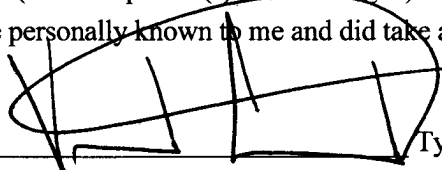
Sworn to and subscribed before me

this 7 day of December, A.D. 2021 by

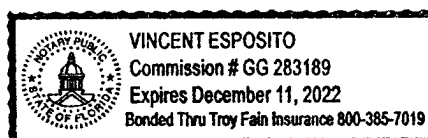
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(name of person(s) acknowledged)

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

Signature  Type or Print Name Vincent Esposito
Title Notary Public

My Commission Expires



CASE NAME: **Mary Grace Baldonado**
DFS CASE NUMBER: PB-90-51212
DCF CASE NUMBER: 1292530367

WITNESS LIST

1. **Melanie Swager**, or designee, Supervisor, OMC Training Manager, Florida Department of Children and Families, 111 South Sapodilla Avenue, West Palm Beach, Florida 33401. PHONE: 561-227-6818.

WILL TESTIFY TO:

- The policies and procedures of the Department as they relate to the applicant's eligibility to receive public assistance and the online application process.
- Issuance of Food Assistance and/or Medicaid benefits for **Mary Grace Baldonado** during the period of June 2018 through December 2019.

WILL PRODUCE (DUCES TECUM):

- Florida Department of Children and Families case record and online applications in the name of **Mary Grace Baldonado**.

Enclosures A through E-2

2. **James Anderson**, or designee, Investigative Specialist Lead, Benefit Recovery Program, Florida Department of Children and Families, 1730 N.E. 31st Ave, Bldg. #1, Gainesville, FL 32609. PHONE: 352-415-6154.

WILL TESTIFY TO:

- The policies and procedures of the Benefit Recovery Program and claim determination reports.
- The Report(s) of Claim Determination (Enclosure N).

WILL PRODUCE (DUCES TECUM):

- Food Stamp Program and Medicaid Program Reports of Claim Determination and Food Stamp Budget Summary.

Enclosure N