

Rough Arrest Only

ARREST / NOTICE TO APPEAR Juvenile Referral Report

1. Arrest 3. Request for Warrant 3 Juvenile
2. N.T.A. 4. Request for Capias

ADMINISTRATION	OBTS Number		Agency ORI Number FL0500000		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 06-20-031274			
	Charge Type: Check as many as apply.		<input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 2. Traffic Felony		<input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 4. Traffic Misdemeanor		<input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 6. Other			
	Location of Arrest (Including Name of Business)		Date of Arrest		Time of Arrest		Booking Date		Booking Time	
	Location of Offense (Business Name, Address) PROSOURCE, 7479 CENTRAL INDUSTRIAL DR, RIVIERA BCH		Jail Date		Jail Time		Location of Vehicle		Weapon Seized/Type 2 1. Yes 2. No	

DEFENDANT	Name (Last, First, Middle) RAMGOOLIE, NISHA		Alias (Name, DOB, Soc. Sec. #, Etc.)									
	Race W - White I - American Indian B - Black O - Oriental/Asian		Sex A	Date of Birth 04/29/1982		Height 503	Weight 120	Eye Color BROWN	Hair Color BLACK	Complexion BROWN	Build SMALL	
	Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description)						Marital Status MARRIED		Religion UNK		Indication of: Alcohol Influence <input type="checkbox"/> <input type="checkbox"/> Drug Influence <input type="checkbox"/> <input checked="" type="checkbox"/>	
	Local Address (Street, Apt. Number) 5134 NW 30TH CT.		(City) MARGATE		(State) FL		(Zip) 33063		Phone (954) 815-6195		Residence Type 1. City 3. Florida 2. County 4. Out of State 3	
	Permanent Address (Street, Apt. Number) SAME		(City)		(State)		(Zip)		Phone		Address Source FL D/L	
	Business Address (Street, Apt. Number) UNKNOWN		(City)		(State)		(Zip)		Phone		Occupation	

CO-DEF	Co-Defendant Name (Last, First, Middle)		Race	Sex	Date of Birth		<input type="checkbox"/> 1. Arrested	<input type="checkbox"/> 3. Felony	<input checked="" type="checkbox"/> 5. Juvenile
	Co-Defendant Name (Last, First, Middle)		Race	Sex	Date of Birth		<input type="checkbox"/> 2. At Large	<input type="checkbox"/> 4. Misdemeanor	<input type="checkbox"/> 5. Juvenile

JUVENILE	<input checked="" type="checkbox"/> Parent Name (Last) (First) (Middle)		Residence Phone			
	<input type="checkbox"/> Legal Custodian					
	<input type="checkbox"/> Other					
	Address (Street, Apt. Number) (City) (State) (Zip)		Business Phone			
Notified by: (Name)		Date	Time	Juvenile Disposition 1. Handled/Processed within Dept. and Released 2. TOT HRS/CYF 3. Incarcerated		
Released To: (Name)		Relationship		FCIC/NCIC	Date	Time
The above address was provided by defendant and/or defendant's parents. The child and/or parent was told to keep the Juvenile Court Clerk's Office informed of any change of address: <input type="checkbox"/> Yes, by: (Name) <input type="checkbox"/> No: (Reason)					School Attended	Grade

CODE	Recovery Information 0. N/A 1. Voluntary 2. Located Not Returned 3. Hospitalized 4. HRS Custody 5. Law Enforcement Custody 6. Returned to Parent 7. Deceased 8. Other							
	Drug Activity		S. Sell R. Smuggle K. Dispense/ M. Manufacture Z. Other		Drug Type		B. Barbituate H. Hallucinogen P. Paraphernalia/ U. Unknown	
	N. N/A B. Buy D. Deliver Produce/ Cultivate		A. Amphetamine E. Heroin O. Opium/Deriv. S. Synthetic					

CHARGE	Charge Description ORGANIZED SCHEME TO DEFRAUD		Counts 01	Domestic Violence <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Statute Violation Number 817.034		Violation of ORD #
	Drug Activity	Drug Type	Amount/Unit \$6550.72	Offense # 20-031274	Warrant/Capias Number		Bond

CHARGE	Charge Description		Counts	Domestic Violence <input type="checkbox"/> Yes <input type="checkbox"/> No	Statute Violation Number		Violation of ORD #
	Drug Activity	Drug Type	Amount/Unit	Offense #	Warrant/Capias Number		Bond

CHARGE	Charge Description		Counts	Domestic Violence <input type="checkbox"/> Yes <input type="checkbox"/> No	Statute Violation Number		Violation of ORD #
	Drug Activity	Drug Type	Amount/Unit	Offense #	Warrant/Capias Number		Bond

CHARGE	Charge Description		Counts	Domestic Violence <input type="checkbox"/> Yes <input type="checkbox"/> No	Statute Violation Number		Violation of ORD #
	Drug Activity	Drug Type	Amount/Unit	Offense #	Warrant/Capias Number		Bond

NOTICE TO APPEAR	<input type="checkbox"/> Instruction No. 1 Mandatory Appearance in Court		Location (Court, Room Number, Address)				
	<input type="checkbox"/> Instruction No. 2 You need not appear in Court but must Comply with instructions on reverse side.		Court Date and Time Month Day Year Time A.M. P.M.				
	I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS NOTICE TO APPEAR, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.						

ADMIN	Signature of Defendant (or Juvenile and Parent/Custodian)		Date Signed	
	HOLD for other Agency Name		Signature of Arresting Officer X	
	<input type="checkbox"/> Dangerous <input type="checkbox"/> Resisted Arrest <input type="checkbox"/> Suicidal <input type="checkbox"/> Other:		Name of Arresting Officer (Print) Det. M. STONE	
Intake Deputy I.D. #		Pouch #	Transporting Officer I.D. #	Agency
Witness here is subject signed with an "X".				PAGE 1 OF 1

2024 FEB 17 AM 10:22
JOSEPH AERUZIO, CLERK
PALM BEACH COUNTY, FL
CRIMINAL CIRCUIT

FILED

PROBABLE CAUSE AFFIDAVIT

OBTS Number	1. Arrest 2. N.T.A. 3. Request for Warrant 4. Request for Capias			3	Juvenile
Agency ORI Number FLO 5 0 0 0 0 0	Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE		Agency Report Number 06 - 20-031274		
Charge Type: <input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 5. Ordinance Check as many <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 6. Other as apply.				Special Notes:	
Defendant's Name (Last, First, Middle) RAMGOOLIE, NISHA			Race A	Sex F	Date of Birth 04/29/1982
Charge Description ORGANIZED SCHEME TO DEFRUAD		Charge Description			
Charge Description		Charge Description			
Victim's Name (Last, First, Middle) PRO SOURCE OF PALM BEACH			Race W	Sex M	Date of Birth 04/07/1961
Victim's Local Address (Street, Apt. Number) SAME		(City)	(State)	(Zip)	Phone 561-848-2221
					Address Source TOM SHEPARDSON
Victim's Business Address (Name, Street) 7479 CENTRAL INDUSTRIAL AVE		(City) RIVIERA BEACH	(State) FL	(Zip) 33404	Phone 904-477-9217
					Occupation DRYWALL
The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody...					
<input type="checkbox"/> committed the below acts in my presence.		<input type="checkbox"/> was observed by _____ who told _____			
<input type="checkbox"/> confessed to _____		that he/she saw the arrested person commit the below acts.			
admitting to the below facts.		<input checked="" type="checkbox"/> was found to have committed the below acts, resulting from my (described) investigation.			
On the 22day of SEPTEMBER, 20020 at <input type="checkbox"/> A.M. <input type="checkbox"/> P.M. (Specifically include facts constituting cause for arrest).					

NARRATIVE:

ON JANUARY 28, 2020, PBSO D/S ELLIS #22074 WAS DISPATCHED TO PROSOURCE OF PALM BEACH LOCATED AT 7479 CENTRAL INDUSTRIAL DRIVE, RIVIERA BEACH, FLORIDA 33404, IN REFERENCE TO EMBEZZLEMENT. UPON ARRIVAL, HE MADE CONTACT WITH PRO SOURCE GENERAL MANAGER MICHAEL TAYLOR, WHO REQUESTED A CRIMINAL INVESTIGATION BE INITIATED AGAINST FORMER EMPLOYEES HE ALLEGED HAD EMBEZZLED THE COMPANY OUT OF \$6550.72. MY INVESTIGATIVE ASSIGNMENT RESULTED IN THE FOLLOWING PROBABLE CAUSE TO CHARGE [REDACTED], [REDACTED] AND NISHA RAMGOOLIE, WITH ORGANIZED SCHEME TO DEFRAUD:

PRO SOURCE COMPANY DESCRIPTION AND BUSINESS MODEL:

PROSOURCE IS A MULTI-LOCATION WHOLESALE FLOORING CHAIN THAT WAS ACQUIRED IN DECEMBER 2016 FROM ANOTHER COMPANY. PROSOURCE SELLS AND/OR DESIGNS COUNTERTOPS, CABINETS, AND FIXTURES FOR KITCHENS & BATHS TO TRADE PROFESSIONALS, E.G. CONTRACTORS, ARCHITECTS, DESIGNERS, BUILDERS, DECORATORS, REMODELERS, ETC. ONCE CREDENTIALLED, TRADE PROFESSIONALS BECOME PROSOURCE MEMBERS AND ARE GIVEN ACCESS TO THEIR SHOWROOM AND A 10 PERCENT PURCHASE DISCOUNT THAT CAN EITHER BE PASSED ONTO THEIR CLIENTS OR GIVEN TO THEM DIRECTLY AS A CUSTOMER REFERRAL FEE.

NARRATIVE CONTINUATION

IN ORDER FOR A TRADE PROFESSIONAL TO RECEIVE REFERRAL FEES, THEY MUST REGISTER WITH A PROSOURCE ACCOUNT MANAGER AND SUBMIT A W9 TAX FORM. WHEN SALES ARE MADE, THE PROSOURCE ACCOUNT MANAGER CREATES AN INVOICE LISTING THE TRADE PROFESSIONAL MEMBER WHO IS TO RECEIVE THE 10 PERCENT COMMISSION MONEY IF APPLICABLE. COMMISSIONS ARE PROVIDED BY CHECKS THAT ARE ISSUED BI-WEEKLY BY THE CORPORATE OFFICE AND GIVEN TO THE ACCOUNT MANAGERS FOR DISTRIBUTION TO THEIR MEMBERS.

THE COMPLAINT: PROSOURCE GENERAL MANAGER MICHAEL TAYLOR AND REGIONAL MANAGER TOM SHEPARDSON REPORTED (SWORN STATEMENTS OBTAINED) THAT AN AUDIT CONDUCTED BY PRO SOURCE MEMBERSHIP MANAGER MICHELLE ST CLAIR REVEALED THAT BETWEEN APRIL 2017 TO JANUARY 2020, FORMER PROSOURCE ACCOUNT MANAGER, [REDACTED], WAS CONDUCTING "A SCHEME" IN CONCERT WITH FORMER PROSOURCE CABINET DESIGNER, [REDACTED], TO FALSELY GENERATE (10) REFERRAL COMMISSION PAYMENT CHECKS IN [REDACTED]'S SPOUSE'S MAIDEN NAME (NISHA RAMGOOLIE) RESULTING IN A TOTAL THEFT LOSS \$6550.72.

THE SCHEME DESCRIPTION AND THE CORROBORATING EVIDENCE ARE DESCRIBED BELOW:

DEFENDANT INTRODUCTION:

[REDACTED] WAS EMPLOYED BY PROSOURCE AS AN ACCOUNT MANAGER (SALES) ON APRIL 1, 2012 AND RESIGNED XMAS EVE OF 2019 (LAST OFFICIAL DAY WAS 01/08/2020).

[REDACTED] WAS EMPLOYED BY PROSOURCE AS A CABINET DESIGNER FROM JANUARY 3, 2013 TO OCTOBER 25, 2018.

NISHA RAMGOOLIE: THE SPOUSE OF [REDACTED] WHO WAS NEVER EMPLOYED BY PROSOURCE NOR IS SHE A TRADE PROFESSIONAL.

MICHELLE ST. CLAIR (SWORN STATEMENTS OBTAINED) REPORTED THAT IN LATE 2019, PRO SOURCE ACCOUNT MANAGER WAYNE GREULICH (SWORN STATEMENT OBTAINED), CALLED HER TO ASK WHY ACCOUNT MANAGER [REDACTED] HAD "STOLEN" HIS CUSTOMER'S REFERRAL FEE BY CHANGING THE REFERRING TRADE MEMBER TO A NISHA RAMGOOLIE, A PERSON HE NOR HIS CUSTOMER (LARRY GOLDSTEIN) NEVER HEARD OF, TO GIVE HER THE SALES/REFERRAL COMMISSIONS THAT HIS CLIENT DESERVED.

NARRATIVE CONTINUATION

WHEN SHE RESEARCHED NISHA RAMGOOLIE SHE DISCOVERED THE FOLLOWING:

- ON 02-05-2017, WELL AFTER THE COMPANY WAS SOLD TO PRO SOURCE, [REDACTED] SIGNED UP/REGISTERED NISHA RAMGOOLIE AS A MEMBER IDENTIFYING HER AS A DESIGNER FOR HER BUSINESS TITLED, "DESIGNS BY NISHA." HE AND [REDACTED] THEN ADDED HER TO (18) CLIENT INVOICES RESULTING IN HER BEING ISSUED (10) SALES/REFERRAL COMMISSION CHECKS THAT SHE WAS NEVER AUTHORIZED TO RECEIVE.
- SHE FOUND NISHA RAMGOOLIE HAD A W9 ON FILE BUT HER REGISTRATION PROFILE HAD "RED FLAGS" BECAUSE THE ADDRESS AND PHONE NUMBER WERE NOT COMPLETE. [REDACTED] ENTERED "XXX" FOR HER ADDRESS AND HER PHONE NUMBER AS ONLY "123." SHE BELIEVED THAT [REDACTED] DID THIS IN EFFORT TO PREVENT HER FROM BEING CONTACTED FOR VERIFICATION.
- WHEN SHE RESEARCHED RAMGOOLIE ONLINE TO SEE IF SHE WAS A DESIGNER, SHE LEARNED THAT SHE IS MARRIED TO FORMER PRO SOURCE KITCHEN DESIGNER [REDACTED], WHO SHE SAID IS "BEST FRIENDS" WITH [REDACTED], AND NO SUCH COMPANY IS REGISTERED ON SUNBIZ.
- SHE CALLED RAMGOOLIE NUMEROUS TIMES LEAVING VOICEMAILS INCLUDING ONE THAT TOLD HER SHE HAS ANOTHER SALES/REFERRAL COMMISSION CHECK AT THE STORE FOR HER TO PICK UP. SHE NEVER CALLED BACK AND DID NOT ATTEMPT TO PICK UP THE CHECK.
- SHE CALLED THE CLIENTS LISTED ON THE INVOICES AND THEY TOLD HER THAT THEY DO NOT KNOW A NISHA RAMGOOLIE AND DID NOT AUTHORIZE HER TO RECEIVE MONIES ON THEIR BEHALF.

CORROBORATING EVIDENCE PROVIDED BY PROSOURCE:

- NISHA RAMGOOLIE'S SUBMITTED HANDWRITTEN W-9 TAX FORM DATED APRIL 26, 2018 SHOWING HER SIGNATURE (WHICH APPEARS TO MATCH PER COMPARISON TO HER FL [REDACTED] DATABASE AND BANK ACCOUNT RECORDS). THIS W-9 WAS SUBMITTED AFTER CORPORATE SENT A REQUEST TO PROVIDE A W-9 FOR A TRANSACTION WITH NISHA RAMGOOLIE EMAIL TO BOTH [REDACTED] AND [REDACTED]. THIS EMAIL CHAIN (COPY PROVIDED) SHOWS THAT ON APRIL 25, 2018, [REDACTED] EMAILS [REDACTED] ASKING FOR HIM TO "PLEASE LOOK AT THIS AND LET ME KNOW, THANKS." [REDACTED] THEN SUBMITS RAMGOOLIE'S W-9 THE FOLLOWING DAY.

NARRATIVE CONTINUATION

- SCREENSHOTS OF THE [REDACTED]'S MEMBER REGISTRATION DATA ENTRIES SHOWING HE REGISTERED RAMGOOLIE AS DESCRIBED.
- (10) CHECKS THAT WERE ISSUED PAY TO THE ORDER OF AND ENDORSED BY NISHA RAMGOOLIE SHOWING NISHA RAMGOOLIE'S SIGNATURE (SIGNATURE APPEARS TO MATCH PER COMPARISON TO HER FL [REDACTED] DATABASE AND BANK ACCOUNT RECORDS)

DATE/AMOUNT/AND CHECK NUMBER:

MAY 31, 2017, AMOUNT \$490.65. CHECK NUMBER 1777
SEPTEMBER 5, 2017, AMOUNT \$1025.97. CHECK NUMBER 2433
MAY 18, 2018, AMOUNT \$666.80, CHECK NUMBER 4253
JUNE 18, 2018, AMOUNT \$818.83, CHECK NUMBER 4458
OCTOBER 9, 2018 AMOUNT \$21.08 CHECK NUMBER 5244
MARCH 5, 2019 AMOUNT \$500, CHECK NUMBER 6267
NOVEMBER 18, 2019 AMOUNT \$500 CHECK NUMBER 7960
DECEMBER 10, 2019 AMOUNT \$500, CHECK NUMBER 8058
JANUARY 6, 2020, AMOUNT \$1565.00, CHECK NUMBER 8151
JANUARY 6, 2020, AMOUNT \$462.39, CHECK NUMBER 8254

BANK OF AMERICA PROVIDED SUBPOENA COMPLIANCE RECORDS CONFIRM THAT THE ABOVE LISTED CHECKS WERE WRITTEN PAY TO THE ORDER OF AND SIGNED BY NISHA RAMGOOLIE AND ALL WERE DEPOSITED INTO THE ACCOUNT SHE SHARES WITH [REDACTED] (ACCOUNT NUMBER [REDACTED]). ONE ATM TRANSACTION DEPOSIT VIDEO, DATED DECEMBER 9, 2020, WAS PROVIDED SHOWING [REDACTED] DEPOSITING CHECK NUMBER 8058 (ID CONFIRMED BY MICHAEL TAYLOR).

- PROSOURCE SALES INVOICES THAT DOCUMENT [REDACTED] AN [REDACTED] AS THE SALES EMPLOYEES WHO ADDED NISHA RAMGOOLIE AS THE REFERRING MEMBER:

CUSTOMER DALE BRANHAM, INVOICE NUMBER PB000273, DATED APRIL 24, 2017, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 1777.

CUSTOMER DALE BRANHAM, INVOICE NUMBER PB0001423, DATED JULY 13, 2017, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 2433.

NARRATIVE CONTINUATION

CUSTOMER RAY DIROCCO, INVOICE NUMBER PB003199, DATED APRIL 1, 2018, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 4253.

CUSTOMER BOB HAMILTON, INVOICE NUMBER PB0004154, DATED JUNE 1, 2018, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 4458

CUSTOMER PAUL GREGG, INVOICE NUMBER PB0005631, DATED SEPTEMBER 14, 2018, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 5254.

CUSTOMER DALE BRANHAM, INVOICE NUMBER PB005784, DATED FEBRUARY 22, 2019, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 6267.

CUSTOMER JAMES AGER, INVOICE NUMBER PB0007575, DATED NOVEMBER 12, 2019, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 7960.

CUSTOMER THERESA DITTMAR, INVOICE NUMBER PB0008052, DATED NOVEMBER 26, 2019, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 8058.

CUSTOMER LYNN KIVLEHAN, INVOICE NUMBER PB0008932, DATED DECEMBER 04, 2019, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 8254.

CUSTOMER THERESA DITTMAR, INVOICE NUMBER PB0008192, DATED DECEMBER 11, 2019, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 8151.

CUSTOMER JAMES AGER, INVOICE NUMBER PB0008052, DATED DECEMBER 30, 2019, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 8254.

CUSTOMER JAMES AGER, INVOICE NUMBER PB0008052, DATED DECEMBER 30, 2019, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 8254.

NARRATIVE CONTINUATION

CUSTOMER JIM BLADINGER, INVOICE NUMBER PB0008954, DATED DECEMBER 30, 2019, SALES PERSON, [REDACTED], COMMISSION PAID TO NISHA RAMGOOLIE VIA CHECK NUMBER 8254.

INVOICES SUBMITTED BY [REDACTED] BUT COMMISSION PAYMENTS STOPPED BY ST CLAIR:

CUSTOMER JASMINE EDWARDS, INVOICE NUMBERS PB0008757, 9014, AND 9015 ALL DATED DECEMBER 30, 2019, SALES PERSON, [REDACTED].

CUSTOMER LARRY GOLDSTEIN, (SALESMAN WAYNE GREULICH'S CUSTOMER) INVOICE NUMBER PB009082 DATED DECEMBER 19, 2019, THESE INVOICES WERE BLOCKED BY MICHELLE ST CLAIR AND COMMISSION PAYMENTS WERE NOT SENT.

- EXCEL SPREADSHEET COMPLETED BY ST CLAIR DOCUMENTING WHAT SHE DID.
- COPIES OF 2017 TO 2019 1099 TAX FORMS SENT BY CORPORATE TO NISHA RAMGOOLIE'S ADDRESS.
- SCREENSHOTS OF [REDACTED]'S DATA ENTRIES FOR THE INVOICES RESULTING IN NISHA RAMGOOLIE'S COMPENSATION.

I INTERVIEWED NISHA RAMGOOLIE (RECORDED, 10 MINUTES IN LENGTH). WHEN I TOLD HER ABOUT THE COMPLAINT, SHE SAID SHE HAS NEVER DONE ANY WORK FOR PRO SOURCE. WHEN ASKED IF AND WHY SHE DEPOSITED PRO SOURCE CHECKS INTO HER ACCOUNT, SHE SAID SHE DOESN'T KNOW, THEN SAID HER HUSBAND TOLD HER HE HAD "A REFERRAL THING" WITH THE PRIOR OWNER (STEVEN CHAN) AND DOES NOT HAVE NOR WANTS TO KNOW ANY DETAILS ABOUT HOW IT WAS SET UP. SHE ENDED THE INTERVIEW AFTER REPEATEDLY REFERRING ME TO CALL STEVEN AND HER HUSBAND.

AFTER SPEAKING WITH RAMGOOLIE AND LEAVING MULTIPLE UNANSWERED VOICEMAILS WITH [REDACTED], I RECEIVED AN EMAIL (COPY PROVIDED) FROM THEIR ATTORNEY, DAVID FASONE, WHO TOLD ME HIS CLIENTS HAD NO CRIMINAL INTENT IN THESE TRANSACTIONS AS THE REFERRAL SYSTEM WAS SET UP ACCORDING TO THE PRIOR OWNER (KARL MARTIN) AND MAKES THIS A CIVIL MATTER RATHER THAN A CRIMINAL ISSUE.

NARRATIVE CONTINUATION

PLEASE INFORM YOUR COMPLAINANT AT PROSOURCE OF WPB THAT MY CLIENTS ARE AMENABLE TO RESOLVING THIS MATTER IN THE FORM OF A CIVIL SETTLEMENT AS SOON AS POSSIBLE. FASONE OFFERED FOR HIS CLIENTS TO GIVE STATEMENTS

PROSOURCE GM TOM SHEPARDSON REPLIED TO FASONE'S EMAIL (COPY PROVIDED) BY STATING:

DETECTIVE STONE,

I WOULD LIKE TO REITERATE THAT WE ARE NOT INTERESTED IN "SETTLING" WITH NISHA RAMGOOLIE & [REDACTED]. THEY CREATED A PLAN TO EFFECTIVELY STEAL REFERRAL CHECKS BY FALSELY REPRESENTING NISHA RAMGOOLIE AS A TRADE PROFESSIONAL WHO WAS SENDING IN CLIENTS TO BUY FROM PROSOURCE. THEY WERE CONDUCTING THIS SCHEME IN CONJUNCTION WITH [REDACTED] UNTIL HE RESIGNED. THEY HAVE HIRED AN ATTORNEY (EFFECTIVELY ADMITTING GUILT) BECAUSE THEY THINK THEY CAN COVER UP THIS CRIME BY "PAYING US OFF".

I CONDUCTED A RECORDED SWORN INTERVIEW WITH FORMER PROSOURCE OWNER KARL MARTIN (8:34 MINUTES IN LENGTH). BOTH [REDACTED] AND [REDACTED] WORKED FOR HIM PRIOR TO SELLING THE COMPANY AND CURRENTLY WORK FOR HIM AT HIS NEW COMPANY (RAMEY ONE CARPET OF STUART). HE CONFIRMED THAT IF A PERSON REFERRED A CUSTOMER TO PROSOURCE (WHETHER OR NOT THEY ARE A TRADE MEMBER) HE WOULD PAY THEM A COMMISSION AND EMPLOYEES HAD HIS AUTHORITY TO INDEPENDENTLY SET UP THE REFERRING CUSTOMER.

I CONDUCTED A RECORDED SWORN INTERVIEW WITH FORMER PROSOURCE GENERAL MANAGER (2010-2017) STEVEN CHAN (8:53 MINUTES IN LENGTH). HE MANAGED BOTH [REDACTED] AND [REDACTED] AND CONFIRMED THAT IF ANYONE REFERRED A CUSTOMER TO PROSOURCE THEY WOULD BE ENTITLED TO THE COMMISSION, BUT THE PERSON MUST BE IN THE TRADE. HE SAID HE KNOWS NISHA RAMGOOLIE AS THE SPOUSE OF [REDACTED] AND THAT [REDACTED] HAS AN INDEPENDENT CABINET BUSINESS.

NARRATIVE CONTINUATION

HE RECALLED HAVING A TALK WITH [REDACTED] ABOUT HIS WIFE RECEIVING COMMISSIONS IF SHE BROUGHT IN A CUSTOMER BUT, WHEN ASKED IF IT WOULD BE WRONG IF THE CUSTOMERS SAID THEY DO NOT KNOW NISHA, HE SAID, "YES I WOULD THINK SO." HE SAID HE DOES NOT KNOW IF [REDACTED] WOULD HAVE A REASON TO ADD NISHA TO HIS DEALS BUT SAID THAT EMPLOYEES CAN SHARE SALES IF WARRANTED.

I INTERVIEWED [REDACTED] (RECORDINGS PROVIDED, 36 MINUTES IN LENGTH). WHEN I INFORMED HIM OF THE COMPLAINT FILED BY PRO SOURCE ACCUSING HIM AND [REDACTED] OF THEFT BY ADDING [REDACTED]'S WIFE TO SALES SHE HAD NOTHING TO DO WITH IN ORDER TO FALSELY GENERATE COMMISSION CHECKS, HE LAUGHED AND SAID THE COMPANY IS PISSED AT HIM FOR LEAVING. HE DENIED ANY WRONGDOING AND SAID THAT IT WAS ACCEPTED PRACTICE TO ADD PEOPLE TO SALES IN ORDER TO GENERATE BUSINESS. HE CLAIMED, AS AN EXAMPLE, THAT MICHAEL TAYLOR, THE COMPLAINANT, EVEN ATTACHED HIS FATHER TO AN ACCOUNT. HE ADMITTED TO ADDING RAMGOOLIE TO SALES AND TO REGISTERING HER (WITHOUT EVER SPEAKING TO HER) BECAUSE [REDACTED] HAD SET HER UP WITH MANAGEMENT LONG BEFORE HE GOT THERE. HE DID NOT SPEAK TO MANAGEMENT ABOUT ADDING HER TO SPECIFIC SALES AND COULD NOT NAME ANY OTHER CLIENTS HE DID THIS WITH BECAUSE IT WAS SO LONG AGO. HE SAID [REDACTED] DID RECENTLY CALL HIM ASKING IF HE HEARD GOT ANY PHONE CALLS ABOUT THIS COMPLAINT, BUT [REDACTED] WOULD GIVE HIM SPECIFICS AND HE DID NOT PUSH IT BECAUSE HE, "DOESN'T PRY." AFTER GETTING ALL THE EVIDENCE FROM PROSOURCE, I LEFT [REDACTED] A MESSAGE AND HE RETURNED MY CALL. WHEN I BEGAN TO SPEAK ABOUT THE CASE, HE TOLD ME THAT HE IS SEEKING LEGAL COUNSEL.

IN RESPONSE TO HIS REVIEWING THE RECORDED INTERVIEWS MADE WITH [REDACTED], NISHA RAMGOOLIE, STEVEN CHAN, AND KARL MARTIN, TOM SHEPARDSON PROVIDED A WRITTEN REBUTTAL:

[REDACTED]'S INTERVIEW IN RESPONSE TO OUR CHARGES CAN BE SUMMARIZED VERY SIMPLY. [REDACTED] IS MISCHARACTERIZING THE PROSOURCE BUSINESS MODEL TO FIT HIS ILLEGAL ACTIONS.

DURING [REDACTED]'S INTERVIEW, HE MADE SEVERAL FALSE CLAIMS:

1. HE SAID CUSTOMERS "MUST BE LINKED TO SOMEONE" AND THE "RFMS SOFTWARE REQUIRES A CUSTOMER TO BE LINKED TO AN EXISTING MEMBER". THIS IS THE REASON HE ARGUED HE LINKED CUSTOMERS TO NISHA RAMGOOLIE.

NARRATIVE CONTINUATION

AS STATED ABOVE, CUSTOMERS NOT INTRODUCED BY A TRADE PROFESSIONAL ARE LINKED TO A SHOWROOM ACCOUNT SO THE ORDER MAY BE PLACED. EACH ACCOUNT MANAGER HAS THEIR OWN SHOWROOM ACCOUNT NAMED "PS OF PB [REDACTED]", "PS OF PB LINDA", "PS OF PB WAYNE", ETC. NO ONE RECEIVES A REFERRAL COMMISSION WHEN LINKED TO A SHOWROOM ACCOUNT. THERE IS NO REASON WHY WALK-INS SHOULD BE LINKED TO NISHA RAMGOOLIE, BECAUSE SHE HAD NOTHING TO DO WITH THEM ARRIVING TO THE SHOWROOM. ANOTHER IMPORTANT POINT TO MAKE IS EVEN IF [REDACTED] NEEDED TO LINK A WALK-IN TO A "MEMBER" AND IF HE DECIDED TO LINK THEM TO NISHA RAMGOOLIE, HE STILL HAS FULL CONTROL OF THE REFERRAL AMOUNT ULTIMATELY PAID OUT. HE COULD HAVE SIMPLY ENTERED "ZERO" IN THE REFERRAL FIELD, BUT IN ALL THESE NAMED INSTANCES, HE ENTERED THOUSANDS OF DOLLARS IN TOTAL INSTEAD.

2. HE SAID THE "MANAGER, MICHAEL TAYLOR, LINKED HIS FATHER TO INVOICES TO RECEIVE COMMISSIONS". THIS IS TRUE, BUT FOR ALL THE RIGHT REASONS WITHIN THE PARAMETERS OF THE PROSOURCE BUSINESS MODEL. MICHAEL'S FATHER IS A TRADE PROFESSIONAL WHO INTRODUCED MULTIPLE CUSTOMERS THAT PURCHASED GOODS AND SERVICES FROM PROSOURCE BETWEEN 2012 TO 2015. HIS FATHER'S ACCOUNT WAS SET UP WITH THE FULL KNOWLEDGE AND SUPPORT OF THE PRIOR BUSINESS OWNERS. [REDACTED] ARGUES THAT HIS ACTIONS ARE JUSTIFIED, AS IS QUITE APPARENT, THIS IS MISLEADING AND FALSE BECAUSE [REDACTED] LINKS CUSTOMERS WHO ARE ABSOLUTE STRANGERS TO NISHA RAMGOOLIE, WHO'S NOT A TRADE PROFESSIONAL. IF EVERYTHING WERE ABOVE BOARD, WHY WOULD NISHA BE ENTERED INTO OUR DATABASE USING HER MAIDEN NAME, NOT HER MARRIED NAME, [REDACTED]. IT'S BECAUSE [REDACTED] WOULD HAVE BEEN A RED FLAG, RECOGNIZED AS THE LAST NAME OF [REDACTED]'S FRIEND AND PAST COWORKER, [REDACTED].

3. [REDACTED] ALSO SUGGESTS HE IS NOT INVOLVED IN THE REFERRAL PROCESS AND THESE CHECKS WERE AUTOMATICALLY GENERATED BECAUSE NISHA RAMGOOLIE WAS ALREADY SET UP AS A MEMBER. THIS IS NOT TRUE. IN EACH CASE, [REDACTED] WOULD HAVE HAD TO INDIVIDUALLY LINK THE CUSTOMER'S ORDER TO NISHA AND ENTER THE REFERRAL AMOUNT INTO THE APPROPRIATE FIELD.

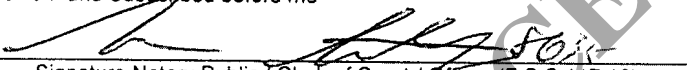
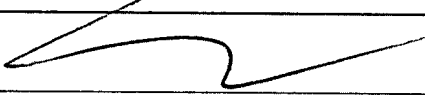
4. IN THE FIRST QUARTER OF 2019, PROSOURCE STARTED A POLICY WHEREBY EACH ACCOUNT MANAGER IS REQUIRED TO ENTER THE AMOUNT OF AN INVOICE REFERRAL (IF ANY) INTO THE INTERNAL NOTES (COPIES PROVIDED) AS A CONFIRMATION. THESE ENTRIES INFORM OUR TEAM THE ACCOUNT MANAGER'S INTENTION TO PAY THE MEMBER A REFERRAL

NARRATIVE CONTINUATION

COMMISSION. THE INTERNAL NOTES OF THE FOLLOWING ORDERS SHOW THAT [REDACTED] UNDERSTOOD NISHA WAS TO RECEIVE A REFERRAL AND THE AMOUNT IN EACH CASE. THE DATE, TIME, AND NAME STAMP DEMONSTRATIONS [REDACTED] MADE THESE ENTRIES-THUS ELIMINATING ANY ARGUMENT THAT THE SYSTEM WAS AUTOMATICALLY ENTERING RAMGOOLIE ONTO SALES.

TOM SHEPARSON AND MICHAEL TAYLOR BOTH CONFIRMED THEIR DESIRE TO PRESS CHARGES AGAINST ALL THREE DEFENDANTS. THEY ALSO SAID THAT SINCE [REDACTED] LEFT THE COMPANY, NO MORE INVOICES WITH NISHA RAMGOOLIE HAVE BEEN GENERATED AND RAMGOOLIE NEVER CALLED TO ASK WHERE HER COMMISSION CHECKS WERE FROM THE INVOICES THEY STOPPED PAYMENTS ON.

BASED ON THE ABOVE FACTS, PROBABLE CAUSE EXIST TO BELIEVE THAT [REDACTED], [REDACTED] AND NISHA RAMGOOLIE, CONDUCTED ORGANIZED SCHEME TO DEFRAUD A SYSTEMATIC ONGOING COURSE OF CONDUCT WITH INTENT TO OBTAIN MONEY FROM PROSOURCE BY FALSE AND FRAUDULENT REPRESENTATIONS CONTRARY TO FSS 817.034.

Sworn and Subscribed before me	
	
Signature Notary Public / Clerk of Court / Officer (F.S.S 117.10)	Signature of Arresting / Investigating Officer
DET. LOU SCHILLING ID#8635	Detective Matthew J. Stone #6456
Name of Notary Public / Clerk of Court / Officer (F.S.S 117.10)	Name of Officer (Please Print)
09222020	09222020
Date	Date