

# Probable Cause Affidavit

Florida Department of Financial Services, Bureau of Workers' Compensation Fraud ORI: FL0505200

Case Number: 19-1291

Defendant: Pedro P. Guzman      Race: W/H      Sex: Male      DOB: 08/13/1952

Height: 5' - 8"      Weight: 260      Hair: Gray / Bald      Eyes: Brown      SSN: [REDACTED]

Florida Driver License: G255-675-52-293-0      AKA: N/A

Address: 5525 42<sup>nd</sup> Terrace  
Vero Beach, FL 32967

Charge Description: One Count – Uttering a Forged Instrument F.S.S. 831.02

One Count – Forgery F.S.S. 831.01

One Count – Knowingly present fraudulent written statement F.S.S. 442.105 (4) (b) 7

Victim: STATE OF FLORIDA

FILED  
19 NOV 13 PM 2:07  
SHARON R. BUSH, CLERK  
PALM BEACH COUNTY, FL  
CIRCUIT CRIMINAL

Before me this date personally appeared, Detective L. Scott Miller who being first duly sworn deposes and says that on the 6<sup>th</sup> day of September 2019 at 360 South County Road Palm Beach FL 33480, located in Palm Beach County the above-named defendant committed the above offenses charged and the facts showing probable cause to believe same are as follows:

This case is predicated on information received on or about October 7, 2019 from Carina Zungia, who is a Compliance Investigator for Workers' Compensation for the State of Florida. Investigator Zungia informed me that she had issued a Stop Work Order (SWO) # 19-222-D2 to PMG General Contracting on October 3, 2019 for not having Workers' Compensation Insurance. Investigator Zungia further stated that she had discovered that PMG had obtained a permit for said job-site located at 253 Royal Poinciana Way in Palm Beach, FL and had submitted a Certificate of Insurance (COI) to the Town of Palm Beach Building Department.

Computer checks of the Florida Division of Corporations revealed that PMG General Contracting Inc. is an active company in the state of Florida. This company was Filed on March 8, 2004 under FEIN # 81-0646304 The President of the company is Pedro P. Guzman of 2950 West Cypress Creek Road Suite 108 in Fort Lauderdale, FL 33309.

Computer checks of Department of Business and Professional Regulation (DBPR) revealed that Guzman is licensed as a General Contractor under license number CGC1507894 from October 6, 2004 and said license expires on August 31, 2020.

A search of the Coverage and Compliance Automated System (CCAS) revealed that PMG General Contracting Inc. does not currently have Workers' Compensation Insurance. PMG has had workers' compensation in the past. The most recent policy period was from ten years ago (2009).

On October 8, 2019 your Affiant met with Debby Moody, who is the Business Services Supervisor for the Building Department for the Town of Palm Beach. Ms. Moody provided me the Certificate of Insurance which was submitted by the defendant. I also obtained a Permit Application which was signed by Guzman. This application was notarized by Marcela Pedraza. I also obtained other documents including a credit card receipt for the permit fee with the name Pedro Guzman. Ms. Moody provided me a signed and notarized Business Record Certificate for all documents she provided to me.

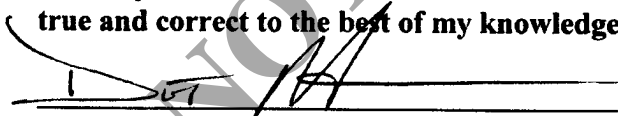
I examined the Certificate of Insurance (COI) and determined that said document was forged based on my training and experience for the following reasons.

- The dates for the policy period are 03/01/19 to 02/29/20, an authentic policy date would run from 03/01/19 to 03/01/20.
- A search of the Coverage and Compliance Automated System (CCAS) of the policy numbers GL84414290651 and WC8339401993 both policy numbers came back with negative results.
- A search of the Producer A.T. Insurance Group was negative, the addresses of this Producer 400 Executive Way Suite 400 West Palm Beach Fl 33401 is not a valid address the Phone number 561-838-5927 is also not a valid phone number to a A.T. Insurance Group.
- ACE Insurance Company listed on the COI was acquired by Chubb Insurance. On October 17, 2019 I contacted Chubb Insurance and Spoke with Sylvester Terry who confirmed that ACE was acquired by Chubb Insurance years ago. Terry also ran the PMG General Contracting Inc. and the policy numbers GL84414290651 and WC8339401993 with negative results

On October 28, 2019, your Affiant interviewed the defendant, Pedro Guzman on a recorded telephone line, he admitted in sum and substance that he had submitted said certificate of Insurance to the Town of Palm Beach Building Department on September 6, 2019. Guzman further stated that he does not have Workers' Compensation Insurance.


Based on the information outlined above, it is the belief of your Affiant, there is probable cause to arrest Pedro P. Guzman for One Count – Uttering a Forged Instrument F.S.S. 831.02, One Count – Forgery F.S.S. 831.01 and One Count – Knowingly present fraudulent written statement F.S.S. 440.105 (4) (b) 7

I hereby swear and affirm that the above information did occur in Palm Beach County, Florida and is true and correct to the best of my knowledge and belief.

  
Dated 10/29/2019

L. Scott Miller, DETECTIVE  
Florida Department of Financial Services  
Division of Investigative and Forensic Services  
Bureau of Workers Compensation Fraud

Subscribed to and sworn before me this 29 day of Oct 2019, by, who is personally known to me.

  
Law Enforcement Officer (F.S.S. 117.10)