

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

AFFIDAVIT OF COMPLAINT

County of
Palm Beach

CASE NUMBER:

PB-90-51534

DCF CASE NUMBER:

1225528445

NAME(S) Yadira Espinoza also known as Yadira Espinosa

SOCIAL SECURITY NO. [REDACTED] DOB May 7, 1987

RACE: White SEX: F HEIGHT: 5'3" WEIGHT: 150 lbs. HAIR: Black EYES: Dark Hazel

LAST KNOWN ADDRESS 1427 Summit Run Circle, West Palm Beach, Florida 33415

OTHER COMMENTS Florida Driver License Number: E215-960-87-667-0

Being Represented By: Grey Tesh, Esq., 561-686-6886

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: Yadira Espinoza, on various days between the 1st day of May 2018 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) reflect that on or about December 20, 2017, during a review of her eligibility to receive public assistance, Yadira Espinoza using the name Yadira Espinosa:

- Reported she was not currently employed.
- Reported that there was no earned income available to her household.

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SHARON F. BUCK, CLERK
Palm Beach County, FL
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Records of the Department reflect that on or about June 7, 2018, during a review of her eligibility to receive public assistance, **Yadira Espinoza** using the name Yadira Espinosa:

- Reported that she was currently employed by Southland Communications, LLC earning \$300.00 weekly.
- Submitted a Verification of Employment form reflecting earnings of \$300.00 weekly from Southland Communications, LLC.
- Reported that there was no other earned income available to her household.

Records of the Department reflect that on or about November 19, 2018 during a review of her eligibility to receive public assistance, **Yadira Espinoza** using the name Yadira Espinosa:

- Reported that she was currently employed by Southland Communications, LLC earning \$200.00 weekly.
- Submitted a Verification of Employment form reflecting earnings between \$200.00 and \$250.00 weekly from Wireless PCS.
- Reported that there was no other earned income available to her household.

Records of the Department reflect that on or about January 2, 2019, during a review of her eligibility to receive public assistance, **Yadira Espinoza** using the name Yadira Espinosa:

- Reported that she was currently employed by Southland Communications, LLC earning \$217.00 weekly.
- Submitted a Verification of Employment form reflecting earnings between \$219.75 and \$245.83 weekly from Wireless PCS.
- Reported that there was no other earned income available to her household.

Furthermore, during the aforementioned reviews of eligibility, **Yadira Espinoza** 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 E-3)

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INVESTIGATION FURTHER REVEALED YADIRA ESPINOZA:

- Was employed by Southland Communications, LLC. from January 17, 2018 through March 15, 2018.
- Was in fact, also employed by MAD Wireless FL LLC formerly Wirelespcs FL, LLC, from February 26, 2018 through at least July 31, 2019.
- Received her first paycheck on March 30, 2018 and her last pertinent paycheck on July 26, 2019; earning total gross wages of \$50,016.09 during this period.
- Received actual weekly gross earnings ranging between \$533.68 and \$1,237.64, during the period of November 19, 2018 through July 31, 2019.
- Submitted to the Department, Verification of Employment/Loss of Income forms which were false, in that they reflected lesser gross wages than her actual earned gross wages.
- Falsely reported continued employment from Southland Communications, LLC after this employment had ended on March 15, 2018.
- Failed to report her gainful employment by MAD Wireless FL LLC formerly Wirelespcs FL, LLC, from February 26, 2018 through November 19, 2018.
- Failed to report her true and accurate income from MAD Wireless FL LLC formerly Wirelespcs FL, LLC, during the period of November 19, 2018 through July 31, 2019.
- Made false statements during her June 7, 2018, November 19, 2018 and January 2, 2019 eligibility review processes.

(Witnesses 3 through 7; Enclosures F through I)

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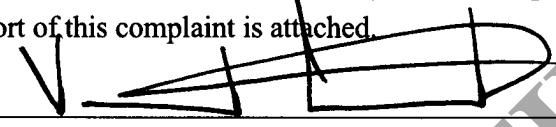
CONCLUSION:

Yadira Espinoza, by means of false statements and/or omissions, failed to report to the Department, her gainful employment by MAD Wireless FL LLC formerly Wirelsspcs FL, LLC from February 26, 2018 through November 19, 2018 at which time she failed to report her true and accurate income from this employment through July 31, 2019.

As a result of her actions, **Yadira Espinoza** received \$2,434.00 in Food Assistance Program benefits during the periods of May 2018 and June 2018, August 2018 through July 2019 to which she was not legally entitled. **Yadira Espinoza** also received or caused the disbursement of \$1,985.03 in Medicaid Program benefits during the periods of January 2019 through July 2019; for an aggregate amount of \$4,419.03 to which she was not legally entitled.

(Witness 2; Enclosure J)

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

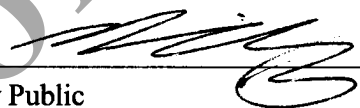


Signature Affiant/Complainant

State of Florida
County of Palm Beach

Sworn to and subscribed before me
this 30 day of September, A.D. 2020 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:

