Probable Cause Affidavit
Florida Department of Financial Services, Fraud Division
Case Number: 21-3190

Defendant: Jaclyn Jean Dedomenico

Race: White **Sex: Female** **DOB: 05/14/1989** **SSN:** [redacted]

Height: 5' – 5" **Weight: 150** **Hair: Brown** **Eyes: Blue**

Florida Driver License: D355-430-89-674-1

Address: (LAST KNOWN) 13830 Oneida Drive, #F1, Delray Beach, FL., 33446

Charge Description: One Count – False and Fraudulent Insurance Claim FSS: 817.234-11(a)

Victim: STATE OF FLORIDA

Narrative:

On May 29, 2012, Jaclyn Dedomenico applied for an Individual 24-hour Accident Plan 2 (Accident) insurance policy (policy number P0B190G7) with American Family Life Assurance Company (AFLAC). The requested effective date for the policy was June 1, 2012. The application was completed under the association business account of Associated Family Physicians of Boca Raton, and the monthly premiums of $20.64, were deducted from Jaclyn Dedomenico's payroll.

On May 9, 2019, Jaclyn Dedomenico converted her Individual 24-hour Accident Plan 2 (Accident) insurance policy (policy number P0B190G7) with American Family Life Assurance Company (AFLAC) into a One-Parent Family 24-hour Accident-Only insurance policy (policy number P0B190G7). The requested effective date for the policy was June 1, 2019. The application remained under the association business account of Associated Family Physicians of Boca Raton, and the monthly premiums of $37.32, were deducted from Jaclyn Dedomenico's payroll.

On September 12, 2019, an AFLAC claim form (claim number 017213617) was signed and submitted by Jaclyn Dedomenico under policy number P0B190G7. The date of the accident was reported as September 1, 2019, and the patient was listed as Jaclyn Dedomenico (DOB 05/14/1989). Multiple documents such as itemization of hospital services, discharge instructions and hospital transcription sheets were submitted with the claim. The documents listed the hospital as Broward Health Coral Springs.

A letter dated on September 12, 2019, was sent to Jaclyn Dedomenico from AFLAC Claims Department. The letter was addressed to 22309 SW 66th Ave., Apt 2510, Boca Raton, FL., 33428-5997, in reference to policy number P0B190G7, patient Jaclyn, provider Broward Health Coral Springs, treatment and claim dates of September 1, 2019 and September 12, 2019. The letter advised that after review of the claim, it was determined that benefits were not payable because treatment was not verified by provider.

On December 14, 2021, at approximately 0900 hours, I traveled to Broward Health Coral Springs located at 3000 Coral Hills Dr., Coral Springs, FL., 33063. Upon arrival, I met with Shavontae Glenn (Glenn), a representative in the medical records department and identified myself as a law enforcement officer. I briefly explained my investigation to Glenn and advised that I needed to verify the dates of services for the personnel in question. I then provided Glenn with an affidavit and requested her to review, sign it and notarize it. Upon Glenn's review I observed her sign the document and then take it to her notary. I then observed that Glenn documented Jaclyn Dedomenico was not seen at Broward Health Coral Springs on September 1, 2019.

Records obtained via subpoena from Broward Health Coral Springs revealed that financial identification number 481092523, did not belong to Jaclyn Dedomenico. Financial identification number 481092523 came back to Ayden Samir

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Maloy. The investigation revealed that Ayden Samir Maloy and Jaclyn Dedomenico were not related nor had any insurable interest. Per Jamie Shank, the records custodian at Broward Health Coral Springs, the financial identification number was a unique that is not duplicated and only provided to patients when they are seen at the hospital. Shank explained that patients do not share financial identification numbers. Furthermore, patient number 74215369, medical record number 0772197, and hospital number as 00456, came back to different patients and/or no record found. All of the medical identification numbers were listed on medical documents submitted by Jaclyn Dedomenico for claim number 017213617.

Jason Ball, AFLAC Special Investigation Unit Manager, explained that Jaclyn Dedomenico's bank information was last updated in the AFLAC database on January 22, 2022 and has been the same account used to receive benefit claim payments since approximately July 28, 2015. Jason Ball further advised that although a payment was not made for claim number 017213617, had it been paid out, Dedomenico would have received the funds in her Suntrust bank account listed in their system. Bank records obtained from Suntrust Bank were received for Jaclyn Dedomenico which disclosed that Jaclyn Dedominco was the account owner. I did not observe any joint account holders listed on the bank records.

On January 26, 2022, at approximately 1412 hours, Detective Utecht and I traveled to 13830 Oneida Drive # F1, Delray Beach, FL., 33446, to locate and interview Jaclyn Jean Dedomenico. Upon arrival, no one answered the door, I then left a notification hanger with my contact information on the door. Detectives left the location without incident.

On January 31, 2022, at approximately 1258 hours, a female who identified herself over the phone as Jaclyn Dedomenico (Dedomenico) contacted me on my state issued cell phone and stated she received my notification hanger. I explained to her that I was conducting a criminal investigation and would like to speak to her in reference to a claim she made with AFLAC on September 12, 2019. I informed her that the interview was voluntary and that she was not obligated to speak with me. I then provided her with my business email address. Dedomenico advised that she did not recall the claim and that she would contact AFLAC to get more information on it. She then advised that she would call or email me once she obtained more information from AFLAC.

Based on the above facts, probable cause exists to believe that Defendant, Jaclyn Jean De Domenico did knowingly make a false/misleading insurance claim when she made a material misrepresentation by presenting false insurance billing forms and/or medical treatment progress notes for hospital and doctor visits that never occurred in support of her insurance claim. Due to the defendant knowingly and unlawfully intention to defraud American Family Life Assurance Company pursuant to an insurance policy, Jaclyn Jean De Domenico violated Florida Statute 817.234-11a, False and Fraudulent Insurance Claims.

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** 2/9/22

Chelsea Roys, DETECTIVE

Florida Department of Financial Services

Bureau of Insurance Fraud

Subscribed to and sworn before me this ____ day _____ 2022, by **Detective Chelsea Roys,** who is personally known to me.

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

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