

ADMINISTRATION	OBTS Number		ARREST / NOTICE TO APPEAR				1. Arrest 3. Request for Warrant 2. N.T.A. 4. Request for Capias		Juvvenile		
	Agency ORI Number FL0500000		Agency Name PALM BEACH COUNTY SHERIFF'S OFFICE				Agency Report Number 06-16-784				
	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		Weapon Seized/Type <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Multiple Clearance Indicator 0 2						
DEFENDANT	Location of Arrest (Including Name of Business)						Location of Offense (Business Name, Address) 934 WEST 5TH ST. RIVIERA BEACH FLORIDA 33407				
	Date of Arrest	Time of Arrest	Booking Date	Booking Time	Jail Date	Jail Time	Location of Vehicle				
	Name (Last, First, Middle) STEINMAN-PICHARDO, DENISE NICOLE						Alias (Name, DOB, Soc. Sec. #, Etc.) DENISE PICHARDO				
CO-DEF	Race W - White I - American Indian B - Black O - Oriental/Asian	Sex F	Date of Birth 09-18-1971	Height 5'04"	Weight 170	Eye Color BRN	Hair Color BLK	Complexion LIGHT	Build MED		
	Scars, Marks, Tattoos, Unique Physical Features (Location, Type, Description) MULTIPLE						Marital Status SINGLE		Indication of: Alcohol Influence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> Unk Drug Influence <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> Unk		
	Local Address (Street, Apt. Number) 934 WEST 5TH ST. RIVIERA BEACH		(City) FLORIDA	(State) Florida	(Zip) 33407	Phone () () ()		Residence Type 1. City 3. Florida 1 2. County 4. Out of State			
JUVENILE	Permanent Address (Street, Apt. Number)		(City)	(State)	(Zip)	Phone () () ()		Address Source			
	Business Address (Street, Apt. Number)		(City)	(State)	(Zip)	Phone () () ()		Occupation			
	D/L Number, State S355-174-71-838-1 Florida		Soc. Sec. Number [REDACTED]		INS Number		Place of Birth NEW YORK, NY		Citizenship USA		
CHARGE	Co-Defendant Name (Last, First, Middle)				Race	Sex	Date of Birth	<input type="checkbox"/> 1. Arrested <input type="checkbox"/> 3. Felony <input type="checkbox"/> 5. Juvenile <input type="checkbox"/> 2. At Large <input type="checkbox"/> 4. Misdemeanor			
	Co-Defendant Name (Last, First, Middle)				Race	Sex	Date of Birth	<input type="checkbox"/> 1. Arrested <input type="checkbox"/> 3. Felony <input type="checkbox"/> 5. Juvenile <input type="checkbox"/> 2. At Large <input type="checkbox"/> 4. Misdemeanor			
	<input type="checkbox"/> Parent Name (Last) (First) (Middle)		<input type="checkbox"/> Legal Custodian		<input type="checkbox"/> Other		Residence Phone () () ()				
CHARGE	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					
CHARGE	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										
CHARGE	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 N. N/A P. Possess		S. Sell R. Smuggle T. Traffic	K. Dispense/ D. Distribute	M. Manufacture/ P. Produce/ C. Cultivate	Z. Other	Drug Type N. N/A A. Amphetamine	B. Barbituate C. Cocaine E. Heroin	H. Hallucinogen M. Marijuana O. Opium/deriv.	P. Paraphernalia/ Equipment S. Synthetic	U. Unknown Z. Other
	Charge Description CONSPIRACY TO COMMIT PUBLIC ASSISTANCE FRAUD		Counts 1	Domestic Violence <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Statute Violation Number 777.04(3) & 414.39 (5)b		Violation of ORD #				
CHARGE	Drug Activity N/A		Drug Type N/A	Amount/Unit	Offense # 16-784	Warrant/Capias Number		Bond			
	Charge Description ORGANIZED SCHEME TO DEFRAUD (OVER \$20K)		Counts 1	Domestic Violence <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Statute Violation Number 817.34 (4)a(2)		Violation of ORD #				
	Drug Activity N/A		Drug Type N/A	Amount/Unit	Offense # 16-784	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 Description		Counts	Domestic Violence <input type="checkbox"/> Yes <input type="checkbox"/> No	Statute Violation Number		Violation of ORD #				
CHARGE	Drug Activity		Drug Type	Amount/Unit	Offense #	Warrant/Capias Number		Bond			
	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 _____								
	I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED ON 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 <i>[Signature]</i>		Name Verification (Printed by Arrestee) (PRINT)						
	<input type="checkbox"/> Dangerous <input type="checkbox"/> Resisted Arrest <input type="checkbox"/> Suicidal <input type="checkbox"/> Other: _____		Name of Arresting Officer (Print) DET. M. SUTTERFIELD		I.D. # 8308				PAGE 1 OF 1		
Intake Deputy		I.D. #	Pouch #	Transporting Officer		I.D. #	Agency	Witness here if subject signed with an "X".			



**PALM BEACH COUNTY SHERIFF'S OFFICE
PROBABLE CAUSE AFFIDAVIT**

OBTS

Charge Type **[3]** 1. Arrest
2. N.T.A.

3. Request for Warrant
4. Request for Capias

Juvenile **[NO]**

Agency ORI Number FL0500000

Agency Report **16-784**

Charge Type: **[X]** Felony ☐ Misdemeanor ☐ Ordinance
☐ Traffic Felony ☐ Traffic Misdemeanor ☐ Other

Special Notes:

DEFENDANT(S):

(1) Defendant: **Moreno, Kiara Lynn**

Address: **4523 Gulfstream Rd. Lake Worth Florida 33461**

Alias: N/A Race: H Sex: F DOB: 05-07-1993

(2) Defendant: **Steinman-Pichardo, Denise Nicole**

Address: **934 West 5th St., Riviera Beach Florida 33407**

Alias: **Denise Pichardo** Race: H Sex: F DOB: 09-18-1971

CHARGES:

Moreno, Kiara Lynn

- (3) Public Assistance Fraud over \$200 FSS 414.39 (5) b
- (1) Grand Theft over \$20K less than \$100K FSS 812.014 (2)b(1)
- (1) Organized Scheme to Defraud over \$20K less than \$50K FSS 817.34 (4)a(2)

Steinman-Pichardo, Denise Nicole

- (1) Conspiracy to Commit Public Assistance Fraud FSS 777.04 (3) &
FSS 414.39 (5)(b)
- (1) Organized Scheme to Defraud over \$20K less than \$50K FSS 817.34 (4)a(2)

VICTIM(S):

Victim: Palm Beach County Housing Authority

Address: 3432 West 45th St. West Palm Beach, Florida 33407

Phone: 561-684-2160 Occupation: Housing Assistance Provider for Palm Beach County

Victim: United States Department of Housing and Urban Development

Address: 801 Cherry St. Fort Worth, Texas 76101

Phone 817-978-5632 Occupation: Housing Assistance Provider for the United States

The undersigned certifies and swears that he has just and reasonable grounds to believe, and does believe, based on investigation, that the above named Defendant committed the following violation of law. The person taken into custody was found to have committed the below acts, resulting from my (described) investigation.

I, Detective Mark Sutterfield # 8308, declare that I am a Law Enforcement Deputy Sheriff employed by that Palm Beach County Sheriff's Office and have reason to believe that Kiara Lynn Moreno and Denise Nicole Stienman-Pichardo, beginning November 2013, and every month thereafter through October 1, 2016, at 934 West 5th St., City of Riviera Beach, State of Florida, did unlawfully:

a) fail by means of false statement, misrepresentation, impersonation, or other fraudulent means, to disclose a material fact used in making a determination as to her qualification to receive aid or benefit under a State or Federally funded assistance program. Fail to disclose a change in circumstance in order or to obtain to continue to receive, under a State or Federally funded assistance program, aid or benefits, contrary to Florida Statute 414.39 (5)(b) Public Assistance Fraud more than \$200.00

b) knowingly obtain or use, or endeavor to obtain or use public assistance benefits of a value of \$300.00 or more, which was property of the Palm Beach County Housing Authority or any other person not the defendant, or the property or benefit there from or to appropriate the property to the use of Kiara Lynn Moreno and Denise Nicole Stienman-Pichardo or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(2)(b)(1).

(c) engage in a scheme constituting a systematic, ongoing course of conduct with intent to defraud one or more persons, or to obtain property from one or more persons by false or fraudulent, representations, or promises, and did obtain property from one or more of such persons, contrary to Florida Statute 817.034(4)(a)3. Organized Scheme to Defraud

The Palm Beach County Housing Authority (PBCHA) –3432 West 45th St., West Palm Beach, FL 33407, is an administrator of the United States Department of Housing and Urban Development's subsidized housing program, a social service program for the disbursement of federally funded public assistance money relative to rental assistance for low income families.

Records maintained by the Palm Beach County Housing Authority (PBCHA) document Kiara Lynn Moreno as a client of the Housing Choice Voucher Program receiving public assistance

benefits at 934 West 5th St., Riviera Beach, Florida 33404. Kiara Lynn Moreno has been a client of PBCHA with the Housing Choice Voucher Program since October 1, 2012. Prior to October 1, 2012, Denise Nicole Stienman-Pichardo, Kiara Lynn Moreno's biological mother, who originally received the voucher on November 16, 2000 prior to transferring the voucher to Kiara Lynn Moreno. At the time of transfer, Denise Nicole Stienman-Pichardo removed herself from the household composition indicating she was moving.

Kiara Lynn Moreno currently pays a portion of \$89.00 for the rental of 934 West 5th St., Riviera Beach Florida 33404 with the remaining \$811.00 paid directly to the landlord by the PBCHA on her behalf.

Kiara Lynn Moreno is currently allowing her mother, Denise Nicole Stienman-Pichardo, to sublease her assisted unit located at 934 West 5th St., Riviera Beach Florida 33404. Kiara Lynn Moreno doesn't currently reside within the assisted unit and hasn't since approximately December of 2015. Prior to December 2015, Kiara Lynn Moreno was subleasing a portion of her assisted unit to her mother, Denise Nicole Stienman-Pichardo who in return paid a portion of household expense. Kiara Lynn Moreno nor Denise Nicole Stienman-Pichardo notified the PBCHA of this living arrangement which is a direct violation of PBCHA and HUD requirements.

PBCHA business records indicate that Kiara Lynn Moreno is currently and has only been permitted to allow the following individuals to reside within her assisted unit since October 1, 2012:

- Kiara Moreno 03-07-1993 ([REDACTED])
- Jeremiah Moreno 06-27-2012 ([REDACTED])
- Ja'Nyla Moreno-Gaines 09-08-2013 ([REDACTED])

PBCHA business records also indicate that Kiara Lynn Moreno has reported the following income sources since October 1, 2012:

10/1/2012 -	Voucher Transfer; Not employed;		N – Other non-wages (received contribution of \$593/month (\$7116) from outside source)
11/1/2012	AR Wages (review file for specific employer)	\$5200	AR
10/1/2013	AR Wages	\$341.00 (Q4 – 2013)	EIV: Fidelity Mutual Life ; Note: PIC has wages of \$5,200
11/1/2013	AR Wages(review file for specific employer)	\$5200	

11/1/2014	AR Not employed		N – Other non-wages (received contribution of \$450/month (\$5400) from outside source)
8/20/2015 – 9/11/2015	Wages -	\$280.00	
11/1/2015			N – Other non-wages (received contribution of \$593/month (\$7116) from outside source)
Q1 - 2016	EIV: Sunshine 5185 LLC	\$129.00	
Q2 – 2016	Walmart	\$14,958 (annualized)	Employed as of 6/21/2016; reported 9/8/2016

Eligibility is determined by the Public Housing Authority (PHA) based on the total annual gross income, family size, criminal arrest history, civil judgment history and is limited to United States citizens and specified categories of non-citizens who have eligible immigration status.

HUD and the PBCHA rules and regulations codified under the Code of Federal Regulations (CFR) require that participants be re-certified at least once annually. This process re-examines but is not limited to, the household composition, sources of family income and criminal arrest history.

Code of Federal Regulations (CFR) Article 24, Chapter 982.511 provides strict guidelines outlining participants “Family Obligations” while receiving benefits from the Housing Choice Voucher (HCV) Program. Sections titled “PHA POLICY” depict additional stipulations required by PBCHA clients.

Obligations of the family are described in the housing choice voucher (HCV) regulations and on the voucher itself. These obligations include responsibilities the family is required to fulfill, as well as prohibited actions. The PHA must inform families of these obligations during the oral briefing, and the same information must be included in the briefing packet. When the family’s unit is approved and the HAP contract is executed, the family must meet those obligations in order to continue participating in the program. Violation of any family obligation may result in termination of assistance.

Time Frames for Reporting Changes Required By Family Obligations

PHA Policy

Unless otherwise noted below, when family obligations require the family to respond to a request or notify the PHA of a change, notifying the PHA of the request or change within 10 calendar days is considered prompt notice. When a family is required to provide notice to the PHA, the notice must be in writing.

The following are some stipulations as written:

Family Obligations [24 CFR 982.551]

Following is a listing of a participant family's obligations under the HCV program:

- Any information supplied by the family must be true and complete.
- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
- The composition of the assisted family residing in the unit must be approved by the PHA. The family must promptly notify the PHA in writing of the birth, adoption, or court-awarded custody of a child. The family must request PHA approval to add any other family member as an occupant of the unit.

PHA Policy

The request to add a family member must be submitted in writing and approved prior to the person moving into the unit. The PHA will determine eligibility of the new member, in accordance with the policies in Chapter 3.

All families will be required to provide documentation demonstrating that the person they are requesting to add to the family composition does not and has not lived with them in the subsidized unit.

- The family must promptly notify the PHA in writing if any family member no longer lives in the unit.
- The family must not sublease the unit, assign the lease, or transfer the unit.

PHA Policy

Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

- The family must promptly notify the PHA when the family is absent from the unit.

PHA Policy

Notice is required under this provision only when all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 14 calendar days. Written notice must be provided to the PHA at the start of the extended absence.

- Family members must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program. (See Chapter 14, Program Integrity for additional information).
- Family members must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate

vicinity of the premises. See Chapter 12 for HUD and PHA policies related to drug-related and violent criminal activity.

Certified HCV Client Business Records obtained from the Palm Beach County Housing Authority for Kiara Lynn Moreno and Denise Nicole Stienman-Pichardo revealed the following pertinent documents:

Document titled "Information Update For Housing" dated September 6, 2012, Part II indicates Kiara Moreno and son, Jeremiah Moreno were receiving assistance at 4809 Gulfstream Rd. Lake Worth Florida 33461. At the bottom of Part II, the following disclaimer is written:

"I/we understand that an additional family member may not be added to the lease until I have submitted a request and the request has been formally approved by the Housing Authority and the Landlord. I/we certify that this Family Composition information given to the Palm Beach County Housing Authority is TRUE, ACCURATE, and COMPLETE. I know I am required to report **immediately in writing** any changes in household size. I understand the rules and regulations regarding guests/visitors and when I must report anyone who is staying with me."

Part II was signed by Kiara Moreno and witnessed by her case worker Latracia Hayes on September 6, 2012.

Document titled "ZERO TOLERANCE POLICY ON FRAUD" dated September 6, 2012 reads the following:

"I (Blank) will report, in writing, any changes in income for myself or any member of my household within 10 days of the change."

"Changes of income include MONEY RECEIVED FROM ANY SOURCE: Exapmles include: court ordered child support, job changes, social security, disability, money received from friend or relatives, etc."

"Failure to report income within 10 days is considered FRAUD."

"Failure to report income will result in a required repayment of all unpaid rent PLUS possible eviction and prosecution."

The "ZERO TOLERANCE POLICY ON FRAUD" document was signed by Kiara Moreno on September 6, 2012.

Document titled "GUESTS [24CFR5.100]" dated September 6, 2012 and reads the following:

"A Guest is a person temporarily staying in the unit with the consent of a member of the household who has express or implied authority to so consent."

PHA Policy

“A guest can remain in the assisted unit no longer than 10 consecutive days or a total of 30 cumulative calendar days during any 12 – month period.”

“I have been informed that if I have overnight guests that spend more than 2 nights a month, I am violating my family obligations through the Housing Choice Voucher Program. In addition, I have been informed that failure to comply may result in termination from the Section 8 Program.”

The “GUEST” document was signed by Kiara Moreno on September 6, 2012.

Document titled “Fraud Affidavit, Palm Beach Co. Housing Authority, Penalties for Fraud” undated and reads the following:

“FRAUD – Withholding information from this Agency or providing false information to this Agency:”

1. Under Federal Law, FRAUD is punishable by fines up to \$10,000 and imprisonment for up to five years.
2. If a resident submits fraudulent information to this agency or withholds relevant information from this agency, the resident will be charged back rent, face eviction proceedings, and will be turned in for prosecution for violating a federal law.
3. Tenants will be required to pay market rent – retroactively, if applicable.

Resident Acknowledgement(s)

By signing below, I confirm:

1. That I have read the penalties for submitting fraudulent information above;
2. That I understand what fraud I, and;
3. That I understand the penalties for committing fraud.

The “Penalties for Fraud” document was signed by Kiara Moreno on an unknown date in 2012.

Document titled “Information Update For Housing” dated July 13, 2013, Part II indicates Kiara Moreno and son, Jeremiah Moreno, were receiving assistance at 934 W. 5th St, Riviera Beach Florida 33407. The document dated July 13, 2013 has the same disclaimer as stated above and is also signed by Kiara Moreno.

Document titled “Obligations of the Housing Choice Voucher Participant” completed on July 21, 2013 and has numerous obligations listed but the following pertain to this investigation:

- All information supplied by the family must be true and complete.
- The family must maintain utilities, for which the tenant is responsible, on in the assisted unit at all times.
- The family must notify the Palm Beach County Housing Authority and the owner before the family moves out of the unit or terminates the lease by a notice to the owner.

- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
- The Palm Beach County Housing Authority must approve the composition of the assisted family residing in the unit within 10 business days of the birth, adoption or court awarded custody of a child. The family must request approval from the Palm Beach County Housing Authority to add any other family member as an occupant of the unit. No other person (i.e. no one but members of the assisted family) may reside in the unit (except for a foster child / foster adult or live in aide).
- The family must notify the Palm Beach County Housing Authority within 10 business days if any family member no longer resides in the unit.
- The family must not sublease or let the unit.
- The members of the household may not engage in drug related criminal activity or other violent criminal activity or other criminal activity that threatens the health safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises.

Document titled "Obligations of the Housing Choice Voucher Participant" dated July 21, 2013 was signed by Kiara Moreno.

Document titled "Information Update For Housing" dated August 16, 2014 Part II indicates Kiara Moreno, son, Jeremiah Moreno and daughter, Janyla Moreno, were receiving assistance at 934 W. 5th St, Riviera Beach Florida 33407. The document dated August 16, 2014 has the same disclaimer as stated above and is also signed by Kiara Moreno. The "Obligations of the Housing Choice Voucher Participant" document as stated above was again signed by Kiara Moreno on August 16, 2014. The "Penalties for Fraud" document as stated above was signed again by Kiara Moreno at an unknown date in 2014.

Document titled "Information Update For Housing" dated August 4, 2015 Part II indicates Kiara Moreno, son, Jeremiah Moreno and daughter, Janyla Moreno, were receiving assistance at 934 W. 5th St, Riviera Beach Florida 33407. The document dated August 4, 2015 has the same disclaimer as stated above and is also signed by Kiara Moreno. The "Obligations of the Housing Choice Voucher Participant" document as stated above was again signed by Kiara Moreno on August 4, 2015. The "Penalties for Fraud" document as stated above was signed again by Kiara Moreno dated November 1, 2015

Document titled "Housing Choice Voucher Interim Change Form" dated received on September 8, 2016 indicates a request to add Denise Pichardo, identified as mother, and Kailani Rosario Ruiz, identified as new child, was completed. The document also indicates that Kiara Moreno's new mailing address will be 4523 Gulfstream Rd. Lake Worth Florida 33461. The document further advises Kiara Moreno is now employed at Walmart located at 9990 Belvedere Rd. Royal Palm Beach Florida working 32 hours a week making \$9.00 an hour. Kiara Moreno indicated the start of employment date was June 25, 2016. The document has the following disclaimer written:

"WARNING:"

“Section 1001 of Title XVII of the United States Code makes it a criminal offense to make willful false statements or misrepresentations to any department or agency of the United States as to any matter within its jurisdiction.”

“I certify that the above information is correct and I understand that any misrepresentation will be grounds for denial or termination with the Section 8 Housing Voucher Program or Public Housing Program.”

Document titled “Housing Choice Voucher Interim Change Form” dated September 8, 2016 was signed by Kiara Moreno.

Kiara Moreno provided a hand written letter dated September 9, 2016 requesting a reasonable accommodation to allow her mother, Denise Pichardo, to be added to the household composition due to “Legal Issues”. Kiara Moreno indicates that Denise Pichardo currently has temporary custody of her children and that Denise Puchardo needs to stay within Kiara Moreno’s home for the next two to three weeks until she has completed her case plan with DCF. This document was signed by Kiara Moreno.

On May 12, 2016, Agents of the Palm Beach County Sheriff’s Office Narcotics Division executed a search warrant at 4523 Gulfstream Rd. Lake Worth Florida 33461 in reference to PBSO Narcotics Case # 16-773. Prior to the execution of the search warrant, Narcotics Agents provided intelligence information to the PBSO Public Assistance Fraud Task Force (PAFTF) where it was discovered that Kiara Lynn Moreno was living within 4523 Gulfstream Rd. to the HCV regulations. During the execution of the search warrant, Narcotics Agents located and arrested Kiara Lynn Moreno, the only adult found within the residence at the time, who was subsequently charged with Possession of Heroin with intent to sell, Possession of Drug Paraphernalia, Possession of a Controlled Substance without a Prescription, Possession of a Schedule IV Narcotic, (3) counts of Child Neglect without Great Bodily Harm and Drug production with minors present.

The Narcotics Agents turned over Kiara Lynn Moreno to PAFTF Agent M. Leatherman # 8299 and me for the purposes of an investigatory in custody interview. Kiara Lynn Moreno was immediately read her Miranda Rights from a pre-printed PBSO Miranda Card which she acknowledged her understanding verbally and by signing the Miranda Card. Kiara Lynn Moreno agreed to provide Agent Leatherman and me with a statement which was audio and video recorded. Kiara Lynn Moreno made the following statements pertinent to this case:

- She has been living within 4523 Gulstream Rd. Lake Worth Florida 33461 for approximately 4 months.
- She moved into the Gulfstream Rd. apartment after her boyfriend, Felix Rosario Ruiz Jr. 05-08-1989 () was incarcerated on January 19, 2016.
- She currently resides at the Gulfstream Rd. apartment with her children Jermiah Moreno 06-27-2012, Ja’nyla Moreno – Gaines 09-08-2013 Kalaia Ruiz (New Born)
- She admitted ownership of Heroin which was later found within the kitchen drawer.
- She stated she currently receives food assistance through the supplemental Nutrition Assistance Program (SNAP) through the Department of Children and Families (DCF) for herself and children.

- She stated she also receives housing assistance in the form of a Housing Choice Voucher (HCV), which is more commonly referred to as a Section 8 Voucher, through the Palm Beach County Housing Authority (PBCHA) for the residence located at 934 West 5th St. Riviera Beach Florida 33404.
- She admitted that her mother, Denise Nicole Steinman-Pichardo 09-18-1971 [REDACTED] is currently and has been living within her HCV funded residence on West 5th St. for the past 4 years.
- She admitted that Denise Pichardo originally held the "Voucher" but it was transferred to her, Kiara Moreno, approximately 4 years ago due to her mother having breast cancer.
- She admitted that Denise Pichardo has been paying 100% of her, Kiara Moreno's, portion of the rent since she has been living at the Gulfstream address over the past (4) months along with all utilities and other household related expenses.
- She indicated that current rent portion that she is responsible to pay for her residence at the West 5th St. address is \$89.00 a month.
- She indicated that prior to her moving out (4) months ago, Kiara Moreno and Denise Pichardo split the costs of the rent along with utilities and household related expenses at a rate of 50%.
- She indicated that her mother, Denise Pichardo, was removed from the voucher 4 years ago and has been living at the West 5th St. address without being on the voucher.
- She indicated that she was told she could add her mother, Denise Pichardo back onto the voucher but failed for an unknown reason.
- She indicated she understood the rules of housing and has completed annual recertifications with the housing authority.
- She indicated that she is currently unemployed.

Simultaneously, while Agent Leatherman and I conducted the interview with Kiara Lynn Moreno, PAFTF Agents Bloeser and Morris made contact with Denise Nicole Stienman-Pichardo at 934 West 5th St., Riviera Beach Florida 33404. Denise Nicole Stienman-Pichardo was read her Miranda Rights from a pre-printed PBSO Miranda Card and provided the following statements to Agents Bloeser and Morris:

- Denise Pichardo is aware the home she is living in at 934 West 5th St. Riviera Beach Florida 33404 is receiving assistance through the Housing Choice Voucher (HCV) Program issued through the Palm Beach County Housing Authority.
- Denise Pichardo was formerly the head of household and originally obtained the HCV from the Palm Beach County Housing Authority on 11-16-2000 but transferred it to her daughter, Kiara Moreno, in October of 2012 due to an illness.
- Denise Pichardo vacated the residence and moved to Georgia after the transfer of the voucher but returned four (4) months later and has resided within the home since that time.
- Denise Pichardo assists with paying utilities and rent which has been split between her and her daughter, Kiara Moreno since she moved back from Georgia.
- Denise Pichardo currently resides within the assisted unit with her daughters Kiara Moreno and Tatiana Moreno (05-14-1992).

An interview with Felix Rosario Ruiz, Kiara Lynn Moreno's boyfriend, was interviewed on May 16, 2016 at the Palm Beach County Main Detention Facility located at 3228 Gun Club Rd. West Palm Beach Florida 33406. Felix Rosario Ruiz was read his Miranda Rights from a pre-printed PBSO Miranda Card due to his current incarceration. The following statements were made to Agent Leatherman and me by Felix Rosario Ruiz pertinent to this investigation which was captured by video and audio:

- Ruiz is currently incarcerated within the Palm Beach County Jail System since January 19th 2016 with an estimated release date of May 23, 2016.
- Ruiz indicated that Kiara Moreno's children were currently being kept by Moreno's mother, Denise Pichardo, at 934 West 5th St. Riviera Beach Florida 33404.
- Ruiz has never resided at 934 West 5th ST. Riviera Beach Florida 33404.
- Ruiz provides financially for Kiara Moreno and her children.
- Ruiz has been in a relationship with Kiara for approximately one year.
- Ruiz has been working two separate jobs, (1) Arby's (2) CC's Pizza
- Ruiz indicated that Denise Pichardo has been living at 934 West 5th St. Riviera Beach Florida 33404 for approximately (4) four years.
- Ruiz indicated that no one else currently resides at 934 West 5th St. Riviera Beach Florida 33404 except Denise Pichardo, Kiara Moreno and her 3 children.
- Ruiz and Kiara Moreno currently have a new born child in common.
- Ruiz stated that Kiara Moreno stopped her employment approximately 2 months prior to the birth of the child indicating around March 2016.
- Ruiz advised that Kiara Moreno previously worked as an Adult Entertainment Dancer at Senioritas Cabaret.

Statements made by Felix Rosario Ruiz led Agent Leatherman and I to the Seniorita Cabaret, newly known as Runway 69 Cabaret, located at 736 Belvedere Rd. West Palm Beach Florida 33405. A subpoena was obtained for Kiara Lynn Moreno's employment records.

On June 2, 2016, Agent Leatherman and I obtained employment records from Runway 69 Cabaret which was provided by the establishment manager, Arthur Leroy Scott. Mr. Scott advised that he wasn't familiar with Kiara Lynn Moreno but only started approximately 6 months prior. Mr. Scott provided an Independent Contractors Agreement for Kiara Lynn Moreno dated November 12, 2013. Mr. Scott indicated that entertainment establishment's such as Runway 69 Cabaret utilize independent contracts with dancers who rent a time slot, DJ and bartender from the establishment. Mr. Scott was unable to give exact employment dates for Kiara Moreno but did indicate that she would've started on or around November 2013 based on her agreement. Mr. Scott indicated that if dancers become inactive for a period of more than thirty (30) days they are required to complete a new agreement. Mr. Scott informed me that based on the date of Kiara Moreno's contractor agreement, that she was steadily employed from November 2013 up until approximately June of 2015. Mr. Scott based this on his time of

employment with the establishment and the location of Kiara Moreno's contractor agreement form in relation to others maintained within the filing system.

A search of Palm Beach County Adult Entertainment Identification information maintained in accordance with Palm Beach County Code Article V. Adult Entertainment Code Section 17, revealed Kiara Lynn Moreno applied for and obtained an Adult Entertainer License on November 22, 2011. According to Palm Beach County Code, this license is required prior to dancing at an adult entertainment establishment. Palm Beach County ordinance doesn't require the applicant to indicate what adult entertainment establishment they will be performing at. Documents were obtained from Palm Beach County Public Safety Department including a duplicate Adult Entertainment Identification Card.

A search of the Florida Drivers and Vehicle Information Database revealed that Kiara Lynn Moreno currently owns a 2008 Black Chevrolet Malibu bearing Florida Tag 320PQZ and a vehicle identification number (VIN) of 1G1ZK577884257924 which is currently being financed through Santander Consumer Credit USA since 06-19-2015. A search of the VIN revealed the vehicle was purchased in 2015 from CarMax located at 2000 High Ridge Rd., Boynton Beach Florida 33426 on the same day she received financing from Santander.

Agent Leatherman and I interviewed CarMax Employee, Gian Carlo Diodato, who provided us with specific contract information relating to Kiara Moreno's vehicle purchase on 06-19-2015 from the CarMax located at 2000 High Ridge Rd. Boynton Beach Florida 33426. Mr. Diodato provided us with a business records certification which included a copy of the following documents:

- Credit Application
- Retail Installment Contract
- Used Vehicle Buyers Order

The documents obtained from CarMax were reviewed with Mr. Diodato in order to obtain a full understanding of each document. Mr. Diodato explained that Kiara Moreno applied for credit in order to purchase a 2008 Chevrolet Malibu bearing VIN # 1G1ZK577884257924. The transaction included the "trade-in" of Moreno's 2003 Mazda MPV bearing VIN # JM3LW28JX30348209. The credit application completed by Kiara Moreno lists the following employment which was utilized in the determination process in order to qualify for financing:

- Arby's as a crew member for one(1) month grossing \$821.00 monthly
- Senoritas Cabaret as a Dancer for two (2) years and eight (8) months grossing \$4,333.00 monthly

Mr. Diodato indicated that based on the employment and income information provided by Kiara Lynn Moreno, she was approved financing for \$16,696.13 over a 72 month period of time through Santander Consumer Credit USA.

A subpoena was obtained and sent to the Florida Power and Light to obtain current records from 934 West 5th St. Riviera Beach Florida 33407. Florida Power and Light records indicate the Kiara Lynn Moreno initiated power utilities on November 1, 2012 which were maintained until

October 28, 2015. This information was inconsistent with observations made by Agents Bloeser and Morris while interviewing Denise Nicole Stienman-Pichardo at 934 West 5th St., Riviera Beach Florida 33407. Agents Bloeser and Morris indicated they could hear the central air conditioning unit running along with illuminated lights within the house during the interview.

Contact was made with the Florida Power and Light Fraud Department who was alerted to the possible theft of power based on the facts discovered. On June 22, 2016, Investigator Codero from Florida Power and Light met Agent Leatherman and me at 934 West 5th St. Riviera Beach Florida 33407 where the power utilities were inspected for tampering. Investigator Cordero indicated that the meter had been tampered with and utilities were being illegally obtained by the occupants from an unknown period of time.

Agent Leatherman and I conducted an interview with the only adult within the house at this time, Denise Nicole Stienman-Pichardo. Denise Nicole Stienman-Pichardo was in the process of leaving the house when Agent Leatherman and I identified ourselves as Law Enforcement Deputy Sheriff's and asked if she was willing to speak with us about the power utilities. Denise Nicole Stienman-Pichardo agreed to briefly answer questions which were captured via video and audio recording. Denise Nicole Stienman-Pichardo made the following statements:

- Denise Pichardo Indicated the residence of 934 West 5th St. Riviera Beach Florida 33404 was being rented by her daughter Tatiana Lucien and son in law Evans Lucien for approximately one (1) month.
- Denise Pichardo currently resides at 437 Lilac St. West Palm Beach Florida 33407 and has for approximately 2 years.
- Denise Pichardo indicated that the utilities are paid for by Evans Lucien
- Denise Pichardo had no information as to who tampered with the meter

The statements made by Denise Nicole Stienman-Pichardo were contrary to statements made to Agents Bloeser and Morris during their initial interview. Agent Leatherman and I attempted to locate 437 Lilac St. West Palm Beach Florida 33407 which Denise Nicole Stienman-Pichardo indicated was her current address which revealed a vacant lot. Investigation revealed that Denise Nicole Stienman-Pichardo previously resided at 438 Lilac St. West Palm Beach Florida 33407.

Agent Leatherman and I made contact with the current tenant of 438 Lilac St. West Palm Beach Florida 33407 on June 22, 2016. A Hispanic male answered the door and identified himself as Jose Ortiz. Mr. Ortiz indicated that he doesn't know Denise Pichardo and has been living at 438 Lilac Ct. for the past 3 months. Mr. Ortiz provided the name and telephone number of his landlord, Jeffrey Viselli, who could assist me further.

Agent Leatherman and I made contact with Jeffrey Viselli on June 23, 2016 at his residence of 1610 Glen Rd. West Palm Beach Florida 33406. Mr. Viselli confirmed Jose Ortiz is his current tenant and the only person authorized to live within his rental unit located at 438 Lilac Ct. West Palm Beach Florida 33407. Mr. Viselli did indicate that Denise Pichardo was a previous tenant of his, but she moved out over three (3) years ago. Mr. Viselli didn't have a copy of his lease with Denise Pichardo but his statements were consistent with his tenant, Jose Ortiz. Mr. Viselli

indicated that Denise Pichardo lived within his unit from approximately 2010 and moved from this unit in 2012. Mr. Viselli indicated that Denise Pichardo resided with her two daughters, Tatiana Moreno and Kiara Moreno and that her tenancy was cut short due to a drug raid by West Palm Beach Police Department. As of this time, I have been unable to locate a corresponding report from West Palm Beach Police Department as to the outcome of a narcotics investigation. Mr. Viselli indicated that he served Denise Pichardo a notice to move which she complied with and left his unit. The interview with Mr. Viselli was audio and video recorded.

Additional investigation revealed that Denise Nicole Stienman-Pichardo is currently self-employed as an erotic internet based entertainer and is utilizing 934 West 5th St. Riviera Beach Florida 33407 as her place of employment. Investigation revealed that Denise Nicole Stienman-Pichardo currently posts nude erotic videos of her on the website www.ConnectPal.com and utilizes the online name of "Sexy Strawberry" with an email address of SEXIBERRY561@GMAIL.COM. Information obtained from web-postings about Denise Nicole Stienman-Pichardo revealed she receives funding for these videos through www.PayPal.com and directly from www.ConnectPal.com.

Subpoenaed Information from ConnectPal, LLC (www.ConnectPal.com) revealed Denise Nicole Stienman-Pichardo opened her ConnectPal account was opened on January 27, 2016 where the following currency was deposited into Green Dot Bank Account # [REDACTED] (routing [REDACTED]):

- February 2016: \$260.00
- March 2016: \$780.13
- April 2016: \$1,254.09
- May 2016: \$1,114.21
- Totaling: \$ 3,408.43

Subpoenaed information from PayPal Global Asset Protection (www.PayPal.com) revealed Denise Nicole Stienman-Pichardo has the following accounts:

- [REDACTED] (established May 30, 2014)
- [REDACTED] (established January 8, 2016)

These accounts indicate Denise Nicole Stienman-Pichardo "work" and "home" address as 934 West 5th St. Riviera Beach Florida 33407. Each account was created utilizing personal information such as a social security number, date of birth and email address which are all are linked back to Denise Nicole Stienman-Pichardo. The following funds are indicated as received on each account:

- 1 [REDACTED] \$15,339.22
- 1 [REDACTED] \$0.00

Investigation reveals that Denise Nicole Stienman-Pichardo has been utilizing her daughter's, Kiara Lynn Moreno, address as not only her home but as her employment location. Since May

2014, Denise Nicole Stienman–Pichardo has received at least \$18,747.65 in income that has been unreported to the PBCHA. This income would directly affect the level of assistance the household receives and is required to be disclosed immediately.

This investigation revealed there are material misrepresentations made to the PBCHA and clear evidence indicating that Kiara Lynn Moreno and Denise Nicole Stienman–Pichardo conspired together in order to conceal information from the PBCHA which would directly affect the benefits being received by the family. The following facts were concealed from the PBCHA:

- The undisclosed income from Kiara Lynn Moreno’s employment as an adult entertainer while employed with Senioritas Cabaret (Runway 69 Cabaret) coupled with the income from Denise Nicole Stienman–Pichardo’s online business would’ve greatly reduced the level of assistance provided by the PBCHA.
- The subleasing of the assisted unit from Kiara Lynn Moreno to Denise Nicole Stienman–Pichardo which started shortly after the voucher was transferred to Kiara Lynn Moreno by her mother, Denise Nicole Stienman–Pichardo, would be a direct violation which would’ve resulted in immediate termination of Kiara Lynn Moreno’s Housing Choice Voucher. The subleasing was admitted to by Kiara Lynn Moreno based on the initial splitting of household bills with her mother compounded by her moving from the unit in December of 2015 where she established residency with Felix Rosario Ruiz at 4523 Gulfstream Rd. Lake Worth Florida 33461 to present date. This violation was further proven based upon observations and an initial interview conducted with Denise Nicole Stienman–Pichardo by Agents Bloeser and Morris.

Denise Nicole Stienman–Pichardo’s previous ownership of the Housing Choice Voucher prior to transfer to her daughter depicts knowledge of housing programs and a direct understanding of subleasing violations.

There is probable cause to believe the following crimes have been committed by Kiara Lynn Moreno and Denise Nicole Stienman–Pichardo:

Kiara Lynn Moreno

Public Assistance Fraud F.S.S.414.39 (5)(b) - Count (1)

Kiara Lynn Moreno failed to disclose her income from the Seniorita Cabaret (Runway 69 Cabaret) to the Palm Beach County Housing Authority which started on November 12, 2013. Documentation obtained from CarMax indicated Kiara Lynn Moreno listed Seniorita Cabaret (Runway 69 Cabaret) as an employer on her finance affidavit completed on 06-19-2015. Kiara Lynn Moreno indicated on the finance affidavit that she has been employed for the past two (2) years and eight (8) months grossing \$4,333.00 monthly. Since November 12, 2013 to October 12, 2014, Kiara Lynn Moreno has received a total of twelve (12) Housing Assistance Payments (HAP) paid to her landlord on behalf of Kiara Lynn Moreno totaling \$9,948.00. Kiara Lynn

Moreno wouldn't qualify for these HAP payments based on her monthly gross income generated from Senorita Cabaret (Runway 69 Cabaret)

Public Assistance Fraud F.S.S.414.39 (5)(b) - Count (2)

Kiara Lynn Moreno failed to disclose her income from the Senorita Cabaret (Runway 69 Cabaret) to the Palm Beach County Housing Authority which started on November 12, 2013. Documentation obtained from CarMax indicated Kiara Lynn Moreno listed Senorita Cabaret (Runway 69 Cabaret) as an employer on her finance affidavit completed on 06-19-2015. Kiara Lynn Moreno indicated on the finance affidavit that she has been employed for the past two (2) years and twelve (12) months grossing \$4,333.00 monthly. Since November 2014 through October 2015, Kiara Lynn Moreno has received a total of twelve (12) Housing Assistance Payments (HAP) paid to her landlord on behalf of Kiara Lynn Moreno totaling \$9,936.00. Kiara Lynn Moreno wouldn't qualify for these HAP payments based on her monthly gross income generated from Senorita Cabaret (Runway 69 Cabaret)

Public Assistance Fraud F.S.S.414.39 (5)(b) - Count (3)

Kiara Lynn Moreno failed to disclose to Palm Beach County Housing Authority that Denise Nicole Stienman-Pichardo was subleasing her assisted unit located at 934 West 5th St., Riviera Beach Florida 33407 and that Kiara Lynn Moreno was actually living at 4523 Gulfstream Rd. Lake Worth Florida 33461 from December 2015 to May 2016. Kiara Lynn Moreno admitted during her arrest on May 12, 2016 that she was actively living at 4523 Gulfstream Rd. Lake Worth Florida 33461 since December 2015 and that her mother, Denise Nicole Stienman-Pichardo, is currently paying all household utility payments and expenses during her absence. Kiara Lynn Moreno further admitted that her mother, Denise Nicole Stienman-Pichardo, has lived with her for a period of approximately four (4) years and paid fifty (50) percent of all household expenses. Denise Nicole Stienman-Pichardo verified Kiara Lynn Moreno's statement confirming she has resided within 934 West. 5th St., Riviera Beach Florida 33407 since approximately February 2013. The Palm Beach County Housing Authority identifies if any financial assistance is offered by an undisclosed tenant as sub-leasing based on 24 CFR 982.551 and Palm Beach County Housing Authority Administrative Plan (2015). This violation occurred from December 2015 until October 2016 where a total of eleven (11) Housing Assistance Payments (HAP) were paid to her landlord on behalf of Kiara Lynn Moreno totaling \$8,921.00.

Grand Theft (over \$20k) F.S.S. 812.014 (2)b(1) - Count (1)

Kiara Lynn Moreno did knowingly obtain or use, or endeavor to obtain or use public assistance benefits of a value of \$20,000.00 or more, which was property of the Palm Beach County Housing Authority or any other person not the defendant, or the property or benefit there from or

to appropriate the property to the use of Kiara Lynn Moreno or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(2)b(1). Grand Theft

Organized Scheme to Defraud (over \$20k) F.S.S. 817.034(4)a(2) - Count (1)

Kiara Lynn Moreno and Denise Nicole Stienman-Pichardo did engage in a scheme constituting a systematic, ongoing course of conduct with intent to defraud one or more persons, or to obtain property from one or more persons by false or fraudulent, representations, or promises, and did obtain property from one or more of such persons, contrary to Florida Statute 817.034(4)a(2).

Denise Nicole Stienman-Pichardo

Conspiracy to Commit Public Assistance Fraud F.S.S. 777.04 (3) and 414.39 (5)(b) - Count (1)

Denise Nicole Stienman-Pichardo did unlawfully agree, conspire, combine or confederate with Kiara Lynn Moreno to commit Public Assistance Fraud, a felony, contrary to Florida Statutes 777.04(3) and 414.39 (5)(b). Denise Nicole Stienman-Pichardo previously held the voucher as head of household therefore she has an understanding of HUD regulations and Palm Beach County Housing Authority policies pertaining to the Housing Choice Voucher Program. Denise Nicole Stienman-Pichardo conspired with Kiara Lynn Moreno by knowingly and willingly subleased Kiara Lynn Moreno's assisted unit contrary to the code of federal regulations.

Organized Scheme to Defraud (over \$20k) F.S.S. 817.034(4)a(2) - Count (1)

Denise Nicole Stienman-Pichardo and Kiara Lynn Moreno did engage in a scheme constituting a systematic, ongoing course of conduct with intent to defraud one or more persons, or to obtain property from one or more persons by false or fraudulent, representations, or promises, and did obtain property from one or more of such persons, contrary to Florida Statute 817.034(4)a(2).

**State of Florida
County of Palm Beach**

The foregoing instrument was sworn to or affirmed before me this **29th day of September 2016**, by **Palm Beach County Sheriff, Detective Mark Sutterfield (ID # 8308)** who is personally known to me.


Notary Public/Clerk of Court/Officer (F.S.S. 117.10)


Signature of Arresting/Investigating Officer
Name of Officer: **Detective Mark Sutterfield (ID#8308)**