

19CF9389

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

AFFIDAVIT OF COMPLAINT

County of
Palm Beach

DFS CASE NUMBER:
PB-90-49572
DCF CASE NUMBER:
1411032845

NAME(S) Jessica Madera

SOCIAL SECURITY NO. DOB August 7, 1986

RACE White SEX F HEIGHT 5'6" WEIGHT 165 lbs. HAIR Brown EYES Brown

LAST KNOWN ADDRESS 621 South H Street, Lake Worth, Florida 33460

OTHER COMMENTS Florida Driver License Number: M360-420-86-787-1

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: **Jessica Madera**, on various days between the **1st day of September, 2015** and the **31st day of January, 2018**, 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 May 14, 2015, November 20, 2015, May 6, 2016, November 14, 2016 and May 3, 2017, during reviews of her eligibility to receive public assistance, **Jessica Madera**:

- Reported that she was employed by Longevity Drugs, earning between \$500.00 to \$600.00 bi-weekly.
- Submitted Verification of Employment forms on or about May 27, 2015, December 3, 2015 and May 10, 2016, for her employment by Longevity Drugs, reflecting bi-weekly earnings between \$250.00 and \$600.00.

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- Submitted Verification of Employment forms on or about November 28, 2016 and May 23, 2017, for her employment by Pharmacy Grid, reflecting bi-weekly earnings of \$600.00.

Records of the Department reflect that on November 8, 2017, **Jessica Madera** submitted a change report reflecting changes to her employment and that she was employed by The Pharmacy Grid earning \$600.00 twice a month.

Records of the Department reflect that on or about November 14, 2017, during a review of her eligibility to receive public assistance, **Jessica Madera**:

- Reported that she was employed by Pharmacy Grid earning \$600.00 bi-weekly.
- Submitted a Verification of Employment form, for her employment by Pharmacy Grid, reflecting bi-weekly earnings of \$600.00.

Furthermore, during the aforementioned review processes, **Jessica Madera** acknowledged that the reported information is true to the best of her knowledge and acknowledged her responsibility to report any changes in her household.

(Witnesses 1, 3 through 5; Enclosures A through H-3)

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INVESTIGATION REVEALED JESSICA MADERA:

- Was employed by The Pharmacy Grid, LLC, formerly known as Longevity Drugs, from September 1, 2015 through at least January 31, 2018.
- Received her first relevant paycheck on September 30, 2015, and her last relevant paycheck on January 31, 2018.
- Earned total gross wages of \$76,155.94, during the period of September 30, 2015 through January 31, 2018.
- Received actual bi-weekly earnings frequently between \$1,006.10 through \$1,908.05, during the aforementioned period.
- Completed, and submitted to the Department, Verification of Employment forms which were false, in that she reflected lesser bi-weekly gross wages than her actual bi-weekly earned gross wages.
- Failed to report her true and accurate income from The Pharmacy Grid, LLC, to the Department, during the period of September 1, 2015 through January 31, 2018.
- Made false statements and/or omissions, at the time of her November 20, 2015, May 6, 2016, November 14, 2016, May 3, 2017 and November 14, 2017 eligibility review processes.

(Witnesses 6 through 10; Enclosures I through M)

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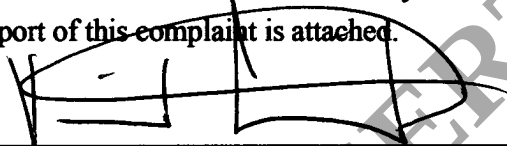
CONCLUSION:

Jessica Madera, by means of false statements and/or omissions, failed to accurately report her true and correct income from her employment with The Pharmacy Grid, LLC, during the period of September 1, 2015 through January 31, 2018.

As a result of her actions, **Jessica Madera** received \$7,336.00 in Food Assistance Program benefits during the period of September 2015 through January 2018, to which he was not legally entitled. In addition, **Jessica Madera** received or caused the disbursement of \$1,668.11 in Medicaid Program benefits during the period of December 2016 through May 2017, July 2017, August 2017, and October 2017 through January 2018; for an aggregate amount of \$9,004.11, to which she was not legally entitled.

(Witness 2, Enclosure N)

A list of witnesses who can identify **Jessica Madera** 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 8th day of May, A.D. 2019 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 Jose Rodriguez Del Rio
Title Notary Public

My Commission Expires:

