

19CF
7769

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

AFFIDAVIT OF COMPLAINT

County of
Palm Beach

DFS CASE NUMBER:
PB-90-49679
DCF CASE NUMBER:
1435060342

NAME(S) Nahomy Romero

SOCIAL SECURITY NO. DOB September 24, 1990

RACE White SEX F HEIGHT 5'3" WEIGHT 170 lbs. HAIR Brown EYES Brown

LAST KNOWN ADDRESS 524 Shady Pine Way #B1 West Palm Beach, FL 33415

OTHER COMMENTS Florida Driver License: R560-620-90-844-0

Before me, personally appeared **Jose Rodriguez Del Rio**, 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: **Nahomy Romero**, on various days between **the 31st day of January 2017 and the 31st day of December 2017**, 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 January 31, 2017 and May 17, 2017, during reviews of her eligibility to receive public assistance, **Nahomy Romero**:

- Reported that she was employed by Felix Andarsio, D.O., P.A. earning \$800.00 bi-weekly.
- Submitted Verification of Employment forms for her employment by Felix Andarsio, D.O., P.A., reflecting bi-weekly earnings of \$800.00.

Furthermore, during the aforementioned review processes, **Nahomy Romero** 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 and 3; Enclosures A through B-3)

FILED
MAY 15 PM 1:33
SHERIFF'S OFFICE
PALM BEACH COUNTY, FL
CRIMINAL DIVISION

CASE NAME: **Nahomy Romero**
DFS CASE NUMBER: **PB-90-49679**
DCF CASE NUMBER: **1435060342**
Affidavit, continued Page 2

INVESTIGATION REVEALED NAHOMY ROMERO:

- Was in fact, employed by Felix Andarsio, D.O., P.A. from April 11, 2016 through at least December 31, 2017.
- Received her first relevant paycheck on January 20, 2017 and her last relevant paycheck on December 22, 2017.
- Earned total gross wages of \$27,128.50 during the period of January 20, 2017 through December 22, 2017; and received actual bi-weekly wages frequently at \$1,120.00 bi-weekly, during this period.
- Completed, and submitted to the Department, Verification of Employment forms which were false, in that she reflected lesser gross wages than her actual earned gross wages.
- Failed to accurately report true and correct income from her employment by Felix Andarsio, D.O., P.A. to the Florida Department of Children and Families, during the period of January 31, 2017 through December 31, 2017.
- Made false statements and/or omissions during her January 2017 and May 2017 eligibility review processes.

(Witnesses 4 through 6; Enclosures C through E)

CASE NAME: **Nahomy Romero**
DFS CASE NUMBER: **PB-90-49679**
DCF CASE NUMBER: **1435060342**
Affidavit, continued Page 3

CONCLUSION:

Nahomy Romero, by means of false statements and/or omissions, failed to report her true and correct income from her employment by Felix Andarsio, D.O., P.A. to the Florida Department of Children and Families, during the period of January 31, 2017 through December 31, 2017.

As a result of her actions, **Nahomy Romero** received \$4,138.00 in Food Assistance Program benefits during the period of January 2017 through December 2017, to which she was not legally entitled. **Nahomy Romero** also received \$468.78 in Medicaid Program benefits during the period of January 2017 through February 2017, for an aggregate amount of \$4,606.78 to which she was not legally entitled.

(Witness 2; Enclosure F)

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

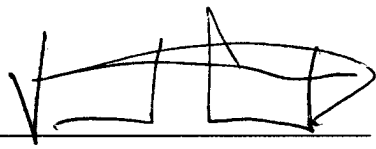

Signature Affiant/Complainant

State of Florida
County of Palm Beach

Sworn to and subscribed before me
this 10th day of MAY, A.D. 2019 by
Jose Rodriguez Del Rio

(name of person(s) acknowledged)

who is /are personally known to me and did take an oath.

Signature 
Title Notary Public

Type or Print Name Vincent Esposito

My Commission Expires:

