

18CF 807

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

COUNTY OF
Palm Beach

DFS NUMBER:
PB-90-46776

AFFIDAVIT OF COMPLAINT

DCF CASE NUMBER:
1459246152

NAME(S): **Roberta De Moraes Brown aka Roberta Moraes Brown**

SOCIAL SECURITY NO.: [REDACTED] DOB: 02/10/73

RACE: **BLACK** SEX: **F** HEIGHT: **5' 8"** WEIGHT: **167lbs.** HAIR: **BROWN** EYES: **BROWN**

LAST KNOWN ADDRESS: 15104 Mahogany Drive, Boynton Beach, Florida 33436

OTHER COMMENTS California Driver License #B7721048.

Before me, personally appeared **Sara H. Stewart**, Investigator, Department of Financial Services of the State of Florida, Division of Public Assistance Fraud, who first being duly sworn, deposes and says that she has reason to believe that **Roberta D. Brown**, on various days between the **1st day of March 2015** and the **31st day of March 2016**, 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 his/her qualification to receive aid or benefits under a state or federally funded assistance program; or did knowingly fail to disclose 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 he/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:

On or about January 6, 2015, March 2, 2015, July 28, 2015 and March 9, 2015, Roberta Brown completed eligibility review processes with the Department of Children and Families (Department) to receive Public Assistance. During her reviews of eligibility, she reported that she was not employed and there was no earned income available to her household. Additionally, during the aforementioned review processes, Roberta Brown acknowledged her responsibility to provide the Department with true and complete information, as well as to report any changes in her income situation. (Witnesses 1, 2, 4 and 5; Enclosures A through D-5)

INVESTIGATION REVEALED:

Roberta Brown was employed by Ascendo Resources, LLC, from January 26, 2015 through June 12, 2015. She received her first pertinent pay check on February 13, 2015 and was continuously employed through June 12, 2015, receiving her last paycheck on June 19, 2015. During the period of February 2015 through June 2015, she earned total gross wages of \$11,538.45 from this employment. In addition, Roberta Brown failed to report this employment during her telephone call with the Department on March 17, 2015. (Witnesses 6, 7, 8 and 12; Enclosures E, E-1, H and I)

Roberta Brown began employment with Belcan Services Group Limited Partnership, on July 6, 2015 and was employed through October 2, 2015. She received her first pertinent pay check on July 16, 2015 and was continuously employed through October 2, 2015, receiving her last pay check on October 8, 2015.

During the period of July 2015 through October 2015, she earned total gross wages of \$8,974.00 from this employment. Roberta Brown failed to report this employment to the Department. (Witnesses 9, 10 and 12; Enclosures F, F-1, H and I)

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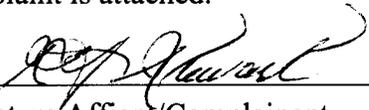
CASE NAME: Roberta D. Brown
DFS CASE NUMBER: PB-90-46776
DCF CASE NUMBER: 1459246152
AFFIDAVIT OF COMPLAINT
CONTINUED, PAGE 2

On October 5, 2015, Roberta Brown began employment with Legal Search Solutions, Incorporated, and was continuously employed through March 11, 2016. Roberta Brown received her first pertinent pay check on October 21, 2015 and she was employed through March 11, 2016, receiving her last pay check on March 23, 2016. During the period of October 2015 through March 2016, she earned total gross wages of \$22,423.10 from this employment. Roberta Brown also failed to report this employment to the Department. (Witnesses 11 and 12; Enclosures G, G-1, H and I)

CONCLUSION:

Roberta Brown, by means of false statements and/or omissions, failed to report her gainful employments with Ascendo Resources, LLC, Belcan Services Group Limited Partnership, and Legal Search Solutions, Incorporated, at the time of her telephone call with the Department on March 17, 2015 and during her July 28, 2015 and March 9, 2016 reviews of eligibility. As a result, she received \$4,029.00 in Food Assistance Benefits, during the period of March 2015 through March 2016. In addition, Roberta Brown received or caused the disbursement of \$1,962.81 in Medicaid Benefits, for the period of September 2015 through February 2016; for an aggregate amount of \$5,991.81 to which she was not legally entitled. (Witness 3; Enclosure J)

A list of witnesses who can identify the subject and present testimony and documents in support of this complaint is attached.



Signature Affiant/Complainant

State of Florida

County of Palm Beach

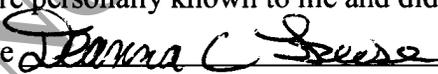
Sworn to and subscribed before me

this 19 day of December A.D. 2017 by

Sara H. Stewart

(name of person(s) acknowledged)

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

Signature  Type or Print Name

Title Notary Public /

My Commission Expires:

