

Signature of Defendant (or Juvenile and Parent/Custodian)

Date Signed

No
Photo
Available

but must comply with instructions on Page 2. MAP 2 3209

Signature of Defendant (or Juvenile and Parent/Custodian)				Date Signed			
ADMIN	HOLD for Other Agency		Signature of Arresting Officer <i>S. J. D.</i>		Name Verification (Printed by Arrestee)		
	<input type="checkbox"/> Dangerous <input type="checkbox"/> Resisted Arrest <input type="checkbox"/> Suicidal <input type="checkbox"/> Other		Name of Arresting Officer (Print) DORE, NEIL		I.D. # 326	(PRINT)	
	Intake Deputy		I.D. #	Pouch #	Transporting Officer	I.D. #	Agency
	Witness here if subject signed with an "X"						
PAGE 1 OF 1							

PROBABLE CAUSE AFFIDAVIT

 1. Arrest
 2. N.T.A.
 3. Request for Warrant
 4. Request for Capias

3

JUVENILE

OBTS Number		PROBABLE CAUSE AFFIDAVIT						
A	Agency ORI Number	Agency Name			Agency Report Number			
D	FL 0502600	PALM BEACH GARDENS POLICE			7 8 16-004413			
M	Charge Type: Check as many as apply.	<input checked="" type="checkbox"/> 1. Felony <input type="checkbox"/> 3. Misdemeanor <input type="checkbox"/> 5. Ordinance <input type="checkbox"/> 2. Traffic Felony <input type="checkbox"/> 4. Traffic Misdemeanor <input type="checkbox"/> 6. Other			Special Notes:			
N	Name (Last, First, Middle)			Alias		Race	Sex	Date of Birth
E	MASTERS, STEPHEN FRANCIS					W	M	11/02/1988
F								
C	Charge Description		Charge Description					
H	812.014(2)(B)(1) THEFT - THEFT GRAND \$20,000-\$100,000		831.09 FORGERY - UTTER/PASS FORGED/COUNTERFEIT BAN					
A	Charge Description		Charge Description					
R	817.034(3)(D) SCHEME TO DEFRAUD							
G	Victim's Name (Last, First, Middle)					Race	Sex	Date of Birth
E	LEVINE LAW GROUP,							
S	Local Address (Street, Apt. Number)		(City)	(State)	(Zip)	Phone	Address Source	
T	3300 PGA BLVD, PALM BEACH GARDENS, FL 33410					(561) 293-0830		
I	Business Address (Name, Street)		(City)	(State)	(Zip)	Phone	Occupation	
M								

The undersigned certifies and swears that he/she has just and resonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.

The Person taken into custody...

committed the below acts in my presence. was observed by _____ who told _____ that he/she saw the arrested person committ the below acts.
 confessed to _____ admitting to the below facts. was found to have committed the below acts, resulting from my (described) investigation.

On the 26 day of August, 2016 at 09:00 (Specifically include facts constituting cause for arrest.)

On 08-26-16 I was assigned the following grand theft and scheme to defraud investigation which, originated at Levine Law Group at 3300 PGA Blvd in the City of Palm Beach Gardens, Palm Beach County Florida. Responding road patrol Officer Ayala, ID# 418 reported the following:

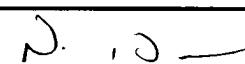
"On 8/24/2016 at approximately 10:20 a.m., I responded to 3300 PGA Blvd (Levine Law Group) located in Palm Beach Gardens, Palm Beach County Florida in reference to a fraud.

On arrival, I made contact with Jay Levine who stated the following. Levine said that he hired [REDACTED] (DOB 02/01/89) on approximate date of 7/20/2015. Levine said that on 8/23/2016 he discovered that [REDACTED] who had possession of company checks was writing checks to herself and to her fiancé Stephen F. Masters (DOB 11/02/88.) Levine said that [REDACTED] hid the records of all checks made out to her and her fiancé in the internal records. All entries she did were done manually by [REDACTED]. When Levine would look at the statements, the records showed that all vendors were being paid.

It appears that [REDACTED] began to type her name and her fiancé's name on the Levine Law Group BB&T account number [REDACTED], beginning on 12/28/2015 through 8/19/2016.

I was able to make contact with [REDACTED] via telephone twice. On both occasions, [REDACTED] stated she was on her way to 10500 North Military Trail to give a statement. [REDACTED] never arrived at the Police station to give her statement.

Levine provided 32 copies of checks made out to [REDACTED] and 36 copies of checks made out to Stephen Masters. Levine also stated that Masters has never worked for his company so there is no reason for him to be receiving any checks from Levine's company. The estimated amount taken by [REDACTED] is over \$50,000 according to Levine."

ADMINISTRATIVE	SWORN AND SUBSCRIBED BEFORE ME		 NOTARY PUBLIC CLERK OF COURT / OFFICER (F.S.S. 117.10) <u>213/17</u> DATE		 SIGNATURE OF ARRESTING / INVESTIGATING OFFICER <u>DORE, NEIL (326)</u> NAME OF OFFICER (PLEASE PRINT) <u>02/03/2017</u> DATE	
						PAGE 1 OF 3

COURT

STATE ATTORNEY

CENTRAL RECORDS

JAIL

CRIME ANALYSIS

P. I. O.

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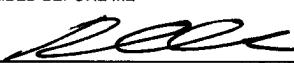
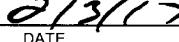
JUVENILE

OBTS Number			
A D M I N I S T R A T I V E	Agency ORI Number FL 0502600	Agency Name PALM BEACH GARDENS POLICE	Agency Report Number 7 8 16-004413
N	Charge Type: Check as many as apply: 1. Felony 2. Traffic Felony	3. Misdemeanor 4. Traffic Misdemeanor	5. Ordinance 6. Other
D E F	Name (Last, First, Middle) MASTERS, STEPHEN FRANCIS		Alias
			Race W Sex M Date of Birth 11/02/1988

I interviewed and took a sworn, videotaped statement from victim Levine at his office on 11-17-16. Levine told me he became aware something was wrong when his bank called him on or around 08-08-16, informing him there were insufficient funds in the trust fund account to clear a check for \$6,000. Levine relayed the information to [REDACTED] who said she made a mistake and put the money in the operating fund instead of the trust fund. Levine asked his paralegals, Courtney Schrader and Kaitlin Laganelli to look into the incident as it sounded suspicious to him. After this incident, Levine later discovered the number of fraudulent checks written to [REDACTED] and Masters increased in frequency. Levine believes [REDACTED] knew her scheme was about to be discovered so she wanted to get more money before being terminated. Levine terminated [REDACTED] on 08-19-16. Levine considers [REDACTED] transfers of trust monies was gross negligence which, she knew from her training, was a bar violation and conducted without Levine's knowledge or permission. Levine reports he has been practicing law in the State of Florida for 40 years, without reprimand. The bar violation may lead to a license suspension or formal reprimand against Levine which, would remain on his history for the next 10 years. A suspension or reprimand would adversely affect Levine's current business reputation and potential for future business. Levine has used his personal money to make the trust account whole. As of this writing, a final ruling from the bar has not been determined. Levine states [REDACTED] concealed her scheme to defraud the business by altering the QuickBooks records to make it appear as if the vendors were being paid as usual. [REDACTED] would actually issue those check numbers to herself or her fiancé, Stephen Masters for much larger amounts. She would keep a positive balance in the operating account by transferring money from the company trust fund.

Levine did not authorize any of the checks made payable to [REDACTED] or Masters. Levine's signature on each check is fraudulent. Levine has never authorized anyone to sign his name to a check; he is the only authorized signer on the account. Masters has never been an employee of Levine Law Group. Through the coordination of [REDACTED] Masters once assembled an office desk free of charge at the Boca Raton office. Masters has never performed any other labor or service for Levine or the Levine Law Group. Levine has no personal relationship with [REDACTED] or Masters. Levine does not suspect any other employee of the crime. [REDACTED] was the sole bookkeeper for the business during the time period in question. There have been no similar incidents before [REDACTED] was hired or after her termination.

On 08-26-16 I called defendant [REDACTED]. She told me she did not show up at the palm Beach Gardens Police Department to meet with Officer Ayala on 8-25-16 because she wanted to speak with an attorney. I told [REDACTED] I would call her back the following week to give her time to consult an attorney. On 8-30-16 I called [REDACTED] again, at which time she told me to call her attorney, Stephen Lankau (561-352-6767.) On 09-07-16, Lankau confirmed he was representing [REDACTED] and Masters. Subsequent calls to Lankau went unreturned.

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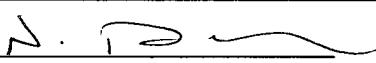
On 09-19-16, I subpoenaed the company bank records including canceled checks from BB&T bank. The certified copies of the canceled checks in question were cashed at two separate Walmart locations in Palm Beach County. Walmart store #3348 located at 101 N. Congress Ave in Lake Park and store # 9900 Belvedere Rd. in West Palm Beach.

Defendant [REDACTED] had 15 checks totaling \$11,909.52 cashed in her name at Walmart store # 3348 (Congress Ave) and 17 checks totaling \$10,208.25 cashed in her name at Walmart store #1541 (Belvedere Rd.) Total amount of checks cashed in defendant [REDACTED] name is \$22,117.67. [REDACTED] did also fraudulently cash a petty cash check valued at \$250.00 and make an unauthorized on-line purchase of a Samsung Tablet for \$329.55. Store surveillance video from the Money Center of two Walmart stores show a white female cashing fraudulent checks on three occasions. Victim Levine identified the suspect as [REDACTED] in still photos taken from the video. Witness Courtney Schrader, former co-worker of [REDACTED] also identified [REDACTED] in the photos taken from surveillance video.

Defendant Masters had five checks totaling \$3,340.10 cashed in his name at Walmart store #3348 (Congress Ave) and 31 checks totaling \$23,686.93 cashed in his name at Walmart store #1541 (Belvedere Rd.) Total amount of checks cashed in defendant Masters name is \$27,027.03. Store surveillance video shows a white male subject with a line tattoo on right forearm (also seen in photos on Masters and [REDACTED] Facebook account) cashing fraudulent checks in his name on 23 occasions at the Money Centers of the two Walmart stores. Master's employment supervisor, witness Robert J. Dick, identified Masters from a surveillance video still photo. Witness Courtney Schrader also identified Masters as the subject in the surveillance still photo.

Although surveillance video does not show the defendant and co-defendant together at the same time in any store, Masters would have to be working in concert with [REDACTED] to obtain the 36 fraudulent checks cashed in his name over the eight-month period, as he was never an employee of Levine Law Group.

Based on the sworn statement provided the victim supported by certified bank documents and surveillance video, probable cause exists the defendant, [REDACTED] and co-defendant, Stephen F. Masters did each intentionally and unlawfully engage in an on-going Scheme to Defraud the victim contrary to F.S.S. 817.034(3)(D), Grand Theft contrary to F.S.S. 812.014(2)(B)(1), and Uttering a Forged Instrument contrary to F.S.S. 831.09 and are charged with one count of each.

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