

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

STATE OF FLORIDA        )  
                                  )  
COUNTY OF MIAMI-DADE )

**STATEMENT OF FACTS IN SUPPORT OF ARREST WARRANT**

Before me, Stacy D. Glick, a Judge of the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, personally appeared Detective Rebeca Perez of the Miami-Dade Police Department, Economic Crimes Bureau, Arson Squad, who being by me first duly sworn, deposes and says that she has probable cause to arrest:

- 1) Barbara Maria Diaz de Villegas, W/F DOB 10/27/1987
- 2) Rafael Exposito, W/M DOB 07/20/1974
- 3) Rigoberto Lopez, W/M DOB 09/19/1975
- 4) Ricardo Alvarez, W/M DOB 09/08/1965
- 5) Jose Gonzalez, W/M DOB 09/15/1960
- 6) Romy Valdespino Rodriguez, W/F DOB 04/08/1992
- 7) Alessandra Kruger, W/F DOB 04/19/1984
- 8) Alicia Pardey, W/F DOB 10/21/1985
- 9) Ricardo Tello, W/M DOB 10/26/1980
- 10) Yuri Tejeda, W/M DOB 09/29/1975
- ~~11) [REDACTED]~~
- ~~12) [REDACTED]~~
- 13) Misael Farinas, W/M DOB 05/07/1975
- ~~14) [REDACTED]~~
- 15) Yoanet Cobiella, W/F DOB 01/18/1978
- 16) Alain Marichal, W/M DOB 08/25/1977
- 17) Eloina Ramos, W/F DOB 04/07/1946
- 18) Manuel Sanchez, W/M DOB 11/19/1962
- 19) Esteban Diaz W/M 04/05/1956
- 20) Emilia Palacio, W/F 03/04/1960
- 21) Fanny Rosales, W/F DOB 06/16/1972
- 22) Alfredo Quinonez, W/M DOB 02/11/1962
- 23) Maria Gaffaro, aka Maria Gonzalez, W/F DOB 01/13/1963
- ~~24) [REDACTED]~~

Affiant's Initials RP  
ASA Initials J.P.  
Judge's Initials SG

- 25) Ibrahim Velazquez, W/M DOB 06/09/1978  
26) Jacqueline Quintanilla, W/F DOB 08/12/1982

- [REDACTED]  
[REDACTED]  
30) Antonio Angelbello, W/M DOB 10/06/1976  
31) Alexis Morfa, WM DOB 04/06/1988  
32) Jessica Mojica, aka Jessica Perez, W/F DOB 12/15/1988

- [REDACTED]  
34) Luz Giraldo, W/F DOB 04/27/1967  
35) Vivian Hernandez, W/F DOB 12/18/1949

Affiant's reasons for the belief that she has probable cause to effectuate such arrests are as follows:

Your Affiant is Detective Rebeca Perez of the Miami-Dade Police Department, Economic Crimes Bureau, Arson Squad. Your Affiant has been a police officer for twenty-three (23) years. As a result of your Affiants' direct participation in the investigation of fraud cases, your Affiant understands the elements necessary to prosecute Racketeering, Grand Theft and Insurance Fraud cases, as well as the requisites necessary to establish probable cause in fraud cases. This affidavit is intended as a summary and is intended solely for the purposes of establishing probable cause.

On November 29, 2017, Your Affiant was assigned the task of investigating The Rubicon Group, a public adjuster firm, owned and operated by Barbara Maria Diaz de Villegas under case number PD 171129456542. Ms. Diaz de Villegas was already under investigation by both Detective A. Sacramento under case number PD171003379326 for forgery and grand theft and Detective Saymaronda Cook in PD161031411039 for similar charges. These investigations stemmed from suspicious insurance claims. Citizens Property Insurance Corporation, Tower Hill Insurance Group, Universal Insurance Company, Universal North America Insurance Company, their representatives were notified that law enforcement was investigating multiple claims and the release of any information related to those claims was requested.

Pursuant to a Search Warrant executed at the office of The Rubicon Group on January 18, 2018, multiple documents and other items were impounded, including but not limited to: claim files (both hard copies and electronic copies), receipt books, financial records, photographs, bank endorsement stamps phone and communication logs, electronic correspondence as well as

Page 2 of 68

Affiant's Initials RP

ASA Initials J.P.

Judge's Initials AM

messages among employees and co-conspirators. Analysis of this seized evidence, as well as the data extracted from the seized electronic devices, which took place over the ensuing months, was reviewed by your Affiant. The following is a brief synopsis of what was discovered from the analysis:

Diaz de Villegas through referrals conspired with multiple homeowners and a network of contractors and assistants to create fictitious losses or exaggerate existing damages to the insured property. The Rubicon Group filed fraudulent claims with the insurance carriers. Any payments made by the insurance carriers as result of the fraudulent claim was shared between the homeowners and the adjuster and the other participants.

### Racketeering Scheme

Barbara Maria Diaz de Villegas hereinafter referred to as Diaz de Villegas, owned and operated The Rubicon Group. This public adjusting business was utilized as part of a Racketeering Enterprise from which to engage in multiple instances of Insurance Fraud and Grand Theft. Specifically, Diaz de Villegas, with the assistance of and/or participation of Rafael Exposito and/or Rigoberto Lopez, and/or Ricardo Alvarez, and/or Jose Gonzalez, and/or Romy Valdespino, and/or Alessandra Kruger, and/or Alicia Pardey and/or Ricardo Tello, and/or other known and unknown co-conspirators in addition to numerous known and unknown homeowners, arranged for intentional water damage to be caused to dwellings and/or exaggerated water damage suffered by dwellings and then filed fraudulent insurance claims causing millions of dollars to be paid out by multiple insurance carriers.

Your affiant has probable cause, as detailed in this affidavit, to believe that between October, 2013 and October, 2017, there existed in Miami-Dade County, Florida, a group of individuals associated in fact, although not a legal entity and said group of individuals associated in fact, were associated with a Florida Corporation; The Rubicon Group and that this group of individuals associated in fact, although not a legal entity are an Enterprise within the meaning of Florida Statute §895.03 Your affiant has probable cause to believe that between October, 2013 and October, 2017,, the subjects Diaz de Villegas, with the assistance and/or participation of Rafael Exposito and/or Rigoberto Lopez, and/or Ricardo Alvarez, and/or Jose Gonzalez, and/or Romy Valdespino, and/or Alessandra Kruger, and/or Alicia Pardey and/or Ricardo Tello and other known and unknown participants were associated with the Enterprise and conducted or participated, directly or indirectly, in such enterprise through a pattern of racketeering activity by engaging in at least two incidents of racketeering conduct that had the same or similar intents, results, victims, or methods of commission, or were otherwise interrelated and were not isolated incidents, in violation of Florida Statute §895.03. Each of these incidents of Racketeering conduct consisted of Fraudulent Insurance Claims under Florida State Statute 817.234(1) and/or Grand Theft under Florida State Statute 812.014 and is explained below.

Page 3 of 68

Affiant's Initials DB

ASA Initials J.P.

Judge's Initials AM

At all times relevant to this investigation Diaz de Villegas, with the assistance and/or participation of Rafael Exposito and/or Rigoberto Lopez, and/or Ricardo Alvarez, and/or Jose Gonzalez, and/or Romy Valdespino, and/or Alessandra Kruger, and/or Alicia Pardey and/or Ricardo Tello served as the principals amongst a group of charged and uncharged defendants that fraudulently billed thousands of dollars to insurers who paid out monies to the Enterprise, and others for staged and/or exaggerated water claims.

A public adjuster is an insurance claim adjuster who is usually an advocate for the policyholder in appraising and negotiating an insurance claim. Aside from attorneys and broker of records, public adjusters licensed by the State Department of Insurance are the only type of claims adjusters that can legally represent the rights of an insured during a property insurance claim process. Most public adjusters charge a percentage of the settlement. Primarily they review the insurance policy to determine what coverage may be applicable, appraise and document the damage, prepare a written or computerized estimate of the loss which is submitted to the insurance carrier, prepare any and all documentation related to the filed claim, and negotiate with the insurance carrier on behalf of the claimant. In addition, the public adjuster's responsibilities include a detailed evaluation of any damages to the structure, damages to the contents, and submitting a written or computerized detailed report to the insurance carrier. In addition, the public adjusters take photographs of the damages for their own records or for submission to the insurance carrier.

During the time of the events that make up the probable cause for arrest detailed herein, Barbara Diaz de Villegas was a licensed public adjuster who owned and operated The Rubicon Group, BG Consulting and Associates, Inc., Superior Insurance Claims Corp., Home Owners Claim Experts and Homeowner's Estimating & Appraisal Corp. The Rubicon Group offices were located at 1411 SW 22 Street, 110401 Bird Road, Suite #329, and most recently 7480 Bird Road, Suites 560 & 605, all in Miami-Dade County, Florida.

Under this scheme, Diaz de Villegas was referred "clients" by previous "clients" and/or by other individuals aware of her fraudulent practices, who for a fee would make the referral. These "clients" were homeowners and/or renters that were interested in participating in staging or exaggerating existing water damage in their homes. With the collaboration of her employees, Alessandra Kruger, and/or Romy Valdespino, and/or Alicia Pardey, Diaz de Villegas would schedule and subsequently conduct a "First Inspection" visit to inspect the property and many times review the insurance policy for the home. Diaz de Villegas's father, Jose Gonzalez would assist the scheme by also performing the "First Inspection" visit as well as by referring "clients." Diaz de Villegas, with the collaboration of Valdespino and/or Kruger and/or Pardey would then schedule, Rafael Exposito, owner of Relwood Installations Corporation, to respond to the dwelling to stage and/or exaggerate the water claims. Also, with the assistance of Valdespino and/or Kruger and/or Pardey, Rigoberto Lopez, owner of Emergency Response and Repair, a water mitigation company, would be scheduled to respond to the dwelling to perform "water mitigation,

Page 4 of 68

Affiant's Initials DB

ASA Initials J.P.

Judge's Initials AY

remediation, or restoration” of the staged or exaggerated water damage. Also, with the assistance of Valdespino and/or Kruger and/or Pardey defendant Diaz de Villegas, would schedule Ricardo Tello, to respond to the dwelling and assess the “damage” and the cost of the “repairs.” Ricardo Tello at the beginning of the scheme was an insurance adjuster employed by Citizens Property Insurance Corporation, and subsequently left Citizens and operated as a private insurance adjuster with ITEJA Consultants, Inc. Once the “damage” was determined Valdespino and/or Kruger and/or Pardey would then, as employees of The Rubicon Group file a claim on behalf of the “homeowner/renter.” In instances where the homeowner did not have homeowner’s insurance or had insufficient coverage, Diaz De Villegas, with the assistance of Valdespino and/or Kruger and/or Pardey, would refer the homeowner to Ricardo Alvarez, an insurance agent with DeZayas Insurance agency, to obtain adequate coverage for the homeowner. Defendant Diaz de Villegas and the co-defendants involved in each incident as detailed below shared any monies paid by the insurance carrier as a result of fraudulent claims.

**DATE OF LOSS:** October 18, 2013  
**INCIDENT ADDRESS:** 13300 SW 54 ST, Miami, FL  
**HOME OWNER:** Yuri Tejada  
**CARRIER:** Citizens (Claim#001-086601)  
**TYPE OF LOSS:** Residential

A review of the Rubicon Group’s internal documents revealed that Yuri Tejada referred clients to The Rubicon Group and he earned a 30% commission on each claim.

On June 3, 2011, Mr. Tejada filed two claims with St. John’s Insurance, and he was represented by Homeowner’s Claims Experts and Ms. Diaz de Villegas. Mr. Tejada was paid \$19,403.16 for a broken pipe in the bathroom and \$3,888.78 for a broken pipe in the kitchen of his home.

On October 10, 2013, Alessandra Kruger scheduled an appointment in the Rubicon Group Outlook calendar for Ms. Diaz de Villegas to complete a First Inspection at Mr. Tejada’s residence at 3:00 p.m. for that same date.

A blank Sworn Proof of Loss and a blank Homeowner’s Estimating Contract with a signature of Yuri Tejada and a client information sheet were located within the internal file for The Rubicon Group.

Page 5 of 68

Affiant’s Initials BT

ASA Initials J.P.

Judge’s Initials AG

On October 14, 2013, Ms. Kruger scheduled a plumbing appointment in the Rubicon Outlook calendar for Mr. Tejada to occur that day at 1:00 p.m. for that same date.

On October 15, 2013, Ms. Diaz de Villegas sent Nemiah Santana a text message asking if Mr. Tejada's job had been completed. Mr. Santana replied that he had not received the information. Ms. Diaz de Villegas sent Mr. Santana the information and Ms. Kruger reset the plumbing appointment in The Rubicon Group calendar for October 16, 2013, at 9:00 a.m.

On October 16, 2013, the text messages between Mr. Santana and Ms. Diaz de Villegas continue in detail whereupon Ms. Diaz de Villegas directed Mr. Santana to obtain old pipes from other properties/job sites to stage the scene for the loss at Mr. Tejada's home. Ms. Diaz de Villegas goes so far as to direct him to be creative and to duplicate the work he did at the house on 212. The text messages continue wherein she continued to direct him to complete "re-piping" jobs in various different locations.

On October 22, 2013, The Rubicon Group calendar reflected an entry as a reminder to, "Sign off on Yuri's claim and open it." Ms. Kruger then contacted Citizens to file a claim on Mr. Tejada's behalf for damages that occurred from a kitchen pipe leak on October 18, 2013. Ms. Kruger sent Citizens a letter of representation signed by Mr. Tejada and dated October 18, 2013.

On October 29, 2013, Larry Webb, a Citizens Field Adjuster, met with Ms. Diaz de Villegas at the property. During his inspection, Ms. Diaz de Villegas pointed out plumbing repairs made to the plumbing under the slab in the kitchen. Ms. Diaz de Villegas stated that Mr. Tejada arrived home after a three-day trip and discovered water on the floor. He then contacted a plumber who responded the same day and made repairs. Mr. Webb noted that the damages to the cabinet and the floor were caused by the plumber.

On October 30, 2013, Ms. Kruger sent Citizens a hand-written invoice that detailed plumbing work performed at Mr. Tejada's home dated October 18, 2013, lacking any information that would identify the plumber. When Mr. Webb requested the plumber's information, Ms. Kruger replied with the name "Nemiah" and the phone number 786-499-5064. It should be noted that the handwritten invoice is consistent with invoices submitted by the Rubicon Group in other insurance claims.

On April 9, 2014, The Morgan Law Group sued Citizens on Mr. Tejada's behalf.

Page 6 of 68

Affiant's Initials BJ

ASA Initials J.P.

Judge's Initials AM

Citizens Property Insurance Company issued several checks in payment for the claims resulting in an approximate payout of twenty thousand three hundred and thirty-six dollars and fifteen cents (\$20,336.15).

DATE	PAYEE	AMOUNT
11/15/2013	Yuri Tejada/Green Tree Servicing/ The Rubicon Group	\$ 5,709.49
12/31/2013	Yuri Tejada/Green Tree Servicing/ The Rubicon Group	\$ 626.66
5/11/2014	Yuri Tejada/Green Tree Servicing/ The Rubicon Group	\$ 9,500.00
5/11/2014	Yuri Tejada/Morgan Law Group	\$ 4,500.00

DATE OF LOSS: [REDACTED]

INCIDENT ADDRESS: [REDACTED]

HOME OWNER: [REDACTED]

CARRIER: [REDACTED]

TYPE OF LOSS: [REDACTED]

According to the Rubicon Group's claim file, [REDACTED] were referred by Ms. Diaz de Villegas' father, Jose Gonzalez.

On Wednesday, December 17, 2013, Ms. Alessandra Kruger emailed Ms. Diaz de Villegas to schedule a "First Inspection" at the [REDACTED] residence for December 18, 2013. As part of the correspondence, Ms. Kruger attached contracts for representation by The Rubicon Group and Homeowners' Estimating and Appraisal Group, a blank "sworn proof of loss", and a "client information sheet". The forms included [REDACTED] personal information. In addition, Ms. Kruger made a notation in the outlook calendar as "New Client" referring to [REDACTED].

On the same day, Ms. Diaz de Villegas replied to Ms. Kruger, "[REDACTED], schedule Rafael for Friday and call her with the time. I have her signed contract."

On Thursday, December 19, 2013, Ms. Kruger emailed Rafael Exposito to report to the [REDACTED] residence on Friday, December 20, 2013, at 2:00 p.m. for "kitchen re-piping."

Page 7 of 68

Affiant's Initials [Signature]

ASA Initials [Signature]

Judge's Initials [Signature]

On Monday, January 6, 2014, Ms. Kruger contacted Citizens to file a claim on [REDACTED] [REDACTED]'s behalf for water damages that had occurred during a kitchen pipe leak that occurred on January 3, 2014. Ms. Kruger sent Citizens a contract for representation signed by [REDACTED] and dated January 3, 2014.

On Thursday, January 9, 2014, Mr. Brent Holloway, Citizens' Field Adjuster, conducted an inspection of the [REDACTED]'s home in the presence of Ms. Diaz de Villegas. Mr. Holloway noted that the cause of the event was due to the failure of a supply line under the kitchen sink.

On Monday, January 20, 2014, Ms. Olga Fonte, a Rubicon Group employee, sent Citizens a handwritten receipt detailing plumbing work done at the [REDACTED]'s residence dated January 3, 2014. (*Johnny Orié 3053288509 written on top*)

On Friday, January 24, 2014, Mr. Holloway conducted a recorded interview with [REDACTED] [REDACTED] in which she stated that on January 3, 2014, she arrived home from work between 6:30 and 7:00 p.m. and discovered water on the kitchen floor and family room. She called a handyman who responded about twenty minutes later. Once the handy man located the source of the leak, he opened the slab and made the repairs.

On Tuesday, June 3, 2014, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$55,670.69 for the damages that occurred in the Dimas residence on January 3, 2014.

Citizens Property Insurance Company issued several checks in payment for the fraudulent claims resulting in an approximate payout of twenty-eight thousand one hundred and eighty-four dollars and sixty-seven cents (\$28,184.67).

DATE	PAYEE	AMOUNT
1/3/2014	Jesse Dimas, Monica Dimas, [REDACTED]	\$28,184.67
1/3/2014	[REDACTED]	[REDACTED]
1/3/2014	J. [REDACTED]	[REDACTED]

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ASA Initials J.P.

Judge's Initials AM



DATE OF LOSS:  
INCIDENT ADDRESS:  
HOME OWNER:  
CARRIER:  
TYPE OF LOSS:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

On December 18, 2013, Ms. Diaz de Villegas conducted a "First Inspection" of the [REDACTED] residence per Rubicon internal documents. On that day, a diagram of the [REDACTED] home was added to the internal claim file. The diagram noted the "BPK" (Broken Pipe Kitchen) and the "AC Leak" upstairs and included all of the items that would be replaced.

On Thursday, January 9, 2014, Ms. Alessandra Kruger contacted Citizens to file a claim on behalf of [REDACTED] for water damages that occurred during an A/C leak that occurred on January 8, 2014. Ms. Kruger sent Citizens a contract for representation with a signature of [REDACTED] and dated January 8, 2014.

On Thursday, January 9, 2014, Mr. Brent Holloway, Citizens' Field Adjuster, inspected the [REDACTED] residence in the presence of Ms. Diaz de Villegas. Mr. Holloway's inspection revealed that a drain line back up caused damage to the laminate flooring on the second floor including the stairs that connected with the first floor.

On Friday, January 24, 2014, Mr. Holloway conducted a recorded interview with [REDACTED] in which she stated that on January 8, 2014, she arrived home from work between 6:30 and 7:00 p.m. and discovered water on the second story floor. Her son cleaned the drain line and she dried the water herself.

On Tuesday, April 8, 2014, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$25,469.40 for the damages that occurred in the [REDACTED] residence on January 8, 2014.

Citizens Property Insurance Company issued several checks in payment for the fraudulent claims resulting in an approximate payout of sixteen thousand one hundred and fifty dollars and eighty-five cents (\$16,150.85).

Page 9 of 68

Affiant's Initials   B  

ASA Initials   J.F.  

Judge's Initials   AJ

The Rubicon Group issued four checks to [REDACTED].

DATE	PAYEE	AMOUNT
[REDACTED]	Jose Blas [REDACTED] Damas Cowen [REDACTED]	[REDACTED]
[REDACTED]	The Rubicon Group	[REDACTED]

INCIDENT ADDRESS:  
HOME OWNER:  
CARRIER:  
TYPE OF LOSS:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

According to the Rubicon Group's internal files, [REDACTED] was referred to The Rubicon Group by Mr. Ariel Berland.

On Wednesday, February 18, 2014, Ms. Alessandra Kruger emailed [REDACTED] to make sure that he sends the pages of his Citizens policy prior to the appointment scheduled for him for the following day at 1:30 p.m. [REDACTED] responded and asked if he sent the correct pages. Ms. Kruger replied that he did.

On Thursday, February 19, 2014, Ms. Kruger scheduled Ms. Diaz de Villegas to respond to [REDACTED]'s residence later that day for a "First Inspection".

On Saturday, February 22, 2014, [REDACTED] sent Ms. Kruger an email discussing documents for a second claim.

On Friday, February 28, 2014, Ms. Kruger contacted Citizens to file a claim on [REDACTED]'s behalf for water damages that had occurred during a bathroom pipe leak on

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ASA Initials J.P.

Judge's Initials [Signature]

February 24, 2014, and a kitchen pipe leak that occurred on February 26, 2014. Ms. Romy Valdespino Rodriguez sent Citizens two letters of representation signed by [REDACTED], one dated February 24, 2014 and the other dated February 26, 2014.

A handwritten invoice dated February 24, 2014, lacking the plumber's information but describing plumbing work performed in [REDACTED]'s bathroom, was located within the Rubicon Group's internal claim file. Another handwritten invoice, same type, describing plumbing work performed in [REDACTED]'s kitchen dated February 26, 2014, was located within the Rubicon Group's internal companion claim file.

On Tuesday, March 4, 2014, Mr. Todd Fenn, a Citizens' Field Adjuster, responded to Mr. [REDACTED]'s home to interview [REDACTED] and conduct an inspection of the property. Mr. [REDACTED] stated that on February 24, 2014, while he was doing laundry he observed water dripping from the ceiling. He then called a plumber who responded the same day and accessed the plumbing via both the bathroom tile wall and the master bedroom wall. Mr. Fenn noted that there was no water damage to the bedroom wall, floorboard, or flooring.

An appraisal and demand in the amount of \$18,443.86 was sent to Citizens for claim number 000-10-099748.

An appraisal and demand in the amount of \$30,454.54 was sent to Citizens for claim number 000-10-099749.

Citizens Property Insurance Company issued several checks in payment for the fraudulent claims resulting in an approximate payout of fifteen thousand nine hundred and seventy-five dollars and seventeen cents (\$15,975.17).

DATE	PAYEE	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] Building Services, The Rubicon Group	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

DATE	PAYEE	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Affiant's Initials [Signature]

ASA Initials [Signature]

Judge's Initials [Signature]

**DATE OF LOSS:** April 17, 2014  
**INCIDENT ADDRESS:** 18331 SW 146 AV, Miami, FL  
**HOME OWNER:** Misael Farina  
**CARRIER:** Citizens (Claim # 001-00-003676)  
**TYPE OF LOSS:** Residential

On Wednesday, February 12, 2014, Ms. Alessandra Kruger emailed Mr. Ricardo Alvarez, at DeZayas Insurance, to advise him that The Rubicon Group had a new client who needed a different insurance carrier. Ms. Kruger provided Mr. Alvarez with Mr. Misael Farina's personal information and inquired if it was possible to obtain a policy specifically with Citizens.

On Thursday, February 13, 2014, Mr. Alvarez replied to Ms. Kruger, "Thank you. I just called him. I will try to help. Thanks Rick."

On Saturday, March 8, 2014, Ms. Kruger scheduled an inspection appointment for the same day at Mr. Farina's home. The entry in the Outlook Calendar had the following notation: "*Will have new Citizens policy at appt.*"

On Thursday, March 13, 2014, Ms. Kruger scheduled Mr. Rafael Exposito for a "Loss Assessment Inspection" at Mr. Farina's home due to a broken pipe.

On Tuesday, March 18, 2014, Ms. Kruger contacted Mr. Alvarez at DeZayas Insurance, to complain that she had attempted to file Mr. Farina's claim with Citizen's but was rejected and instead she was referred back to the insurance agent. Mr. Alvarez explained that because Mr. Farina did not have prior insurance coverage, the policy had a 30-day waiting period from the effective date of March 16, 2014.

On Friday, April 17, 2014, Ms. Kruger contacted Citizens to refile a claim on behalf of Mr. Farina for water damages that had occurred at his residence on Friday, April 17, 2014. Ms. Kruger sent Citizens a signed Letter of Representation dated April 17, 2014. Ms. Kruger provided Citizens with a typed plumber's invoice dated April 17, 2014.

On Wednesday, August 4, 2014, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an attachment for an estimate totaling \$52,134.52.

Page 12 of 68

Affiant's Initials AK

ASA Initials J.P.

Judge's Initials AD

Citizens Property Insurance Company issued several checks in payment for this claim resulting in an approximate payout twenty-nine thousand eight hundred ninety-five and six cents (\$29,895.06):

DATE	PAYEE	AMOUNT
5/9/2014	Misael Farina/JP Morgan Chase Bank NA ISAOA/ The Rubicon Group	\$3,885.72
7/9/2014	Misael Farina	\$22,409.34
9/12/2014	Misael Farina/JP Morgan Chase Bank NA ISAOA/ The Rubicon Group	\$3,600.00

DATE OF LOSS:  
INCIDENT ADDRESS:  
HOME OWNER:  
CARRIER:  
TYPE OF LOSS:

[REDACTED]

Mr. Romanos and Mrs. Leyla Tobbaji were referred to the Rubicon Group by Mr. Raul Barrero (Badel Corp) who has multiple claims filed with The Rubicon Group according to internal Rubicon documents.

On April 28, 2014, the property located at [REDACTED], Florida, was purchased by Anisant LLC. The effective date of the property insurance policy with Citizens was May 8, 2014. According to State of Florida corporate records, Leyla Tobbaji is listed as a manager of Anisant LLC.

On June 7, 2014, [REDACTED], contacted Ms. Diaz de Villegas via email to ask that a contract for representation be sent to him and provides his contact information.

Page 13 of 68

Affiant's Initials [Signature]

ASA Initials J.P.

Judge's Initials [Signature]

On Monday, June 9, 2014, Ms. Alessandra Kruger sent [REDACTED] an email titled: "[REDACTED] & RETURN." Ms. Kruger then explained that once the contracts were signed and returned, she would, "make an appointment to have Rafael go to your house to do the plumbing."

On Monday, June 16, 2014, Ms. Diaz de Villegas forwarded the aforementioned email sent by Ms. Kruger to [REDACTED] with the same contracts attached. [REDACTED] replied and included the signed contracts and inquired if anything else was needed to schedule the appointment.

On June 17, 2014, Alessandra Kruger emailed Rafael Exposito to respond to the Tobajji's property on June 19, 2014 for a loss assessment inspection.

On June 18, 2014, an entry was made into the Rubicon Group outlook calendar for Mr. Rafael Exposito is to respond to two of Mr. and Mrs. Tobbaji's properties on June 19, 2014, for a Loss Assessment Inspection due a broken pipe in the kitchen of each property. It should be noted that the second claim was also filed by The Rubicon Group with Citizens for the property located at 12904 SW 116 CT under claim number 001-00-010605 with a Date of Loss of June 23, 2014. Both claims list [REDACTED] as the contact person.

Within The Rubicon Group's internal file for this claim was a sworn proof of loss, with a signature of Layla Tobbaji even though the amount of loss was left blank. A Homeowner's estimating and Appraisal Corp. contract with Layla Tobbaji's signature was also signed with a blank date.

On June 20, 2014, Ms. Diaz de Villegas contacted Citizens to file a claim on the Tobajji's behalf. Ms. Diaz de Villegas sent Citizens a letter of representation with a signature of Layla Tobbaji and dated June 16, 2014.

On June 27, 2014, Mr. Norman Wright, a Citizens' Field Adjuster, conducted an inspection of the property with an unnamed representative from The Rubicon Group. The representative explained that a water supply line broke and the plumber drilled a hole through the tile floor to access the pipe.

On July 8, 2014, Mr. Wright conducted a recorded interview via telephone with [REDACTED] who identified himself as the insured. Ms. Diaz de Villegas was also on the

Page 14 of 68

Affiant's Initials BS

ASA Initials J.P.

Judge's Initials AG

recorded line. [REDACTED] stated that on the date of loss, the tenant, Angel Suarez, called to advise that there was water on the kitchen floor. [REDACTED] then called a plumber who responded to the property at 8:00 p.m. that night. The plumber determined that the water supply line under the cement foundation had broken and proceeded to make repairs. [REDACTED] stated that he had owned the property for six months.

On October 13, 2014, Ms. Diaz de Villegas sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$85,287.19 for the damages that occurred at Mr. and Ms. Tobajji's residence on June 16, 2014.

Citizens Property Insurance Company issued several checks in payment for the claims resulting in an approximate payout of twenty-six thousand eight hundred and thirty-eight dollars and sixty-two (\$26,838.62).

DATE	PAYEE	AMOUNT
7/22/2014	Anisant LLC/ S&L Investments/ The Rubicon Group	\$ 9,065.04
8/12/2014	Anisant LLC/Elite Premium Finance/ Leyla Tobajji/The Rubicon Group	\$12,635.74
11/01/2014	Anisant LLC/Elite Premium Finance/ Leyla Tobajji/The Rubicon Group	\$ 5,137.84

<b>DATE OF LOSS:</b>	June 23, 2014
<b>INCIDENT ADDRESS:</b>	12904 SW 116 CT Miami, FL
<b>HOME OWNER:</b>	Romanos Tobbaji (AKA Raymond Tobbaji)
<b>CARRIER:</b>	Citizens (Claim #001-00-010605)
<b>TYPE OF LOSS:</b>	Residential

On April 12, 2014, Mr. Romanos Tobbaji had the property in questioned appraised.

On May 22, 2014, Mr. Tobbaji's insurance policy with Citizens became effective.

On June 7, 2014, [REDACTED], Realtor for Unlimited Real Estate Corp., contacted Ms. Diaz de Villegas via email to request that a contract for representation be sent to him and he provided his contact information.

Affiant's Initials PR

ASA Initials LR

Judge's Initials LY

On June 16, 2014, Ms. Alessandra Kruger sent [REDACTED] an email titled, "2  
*BROKEN PIPE KITCHEN CONTRACTS TO SIGN & RETURN.*"

On June 17, 2014, [REDACTED] returned the contracts with a signature of Romanos Tobbaji and dated June 23, 2014. Ms. Kruger then emailed Mr. Rafael Exposito to respond to the Tobbaji's properties on June 19, 2014, at 2:00 p.m. for a "Loss Assessment Appointment" due to a broken pipe in the kitchen of each property.

On June 23, 2014, Ms. Kruger contacted Citizens to file a claim on Mr. Tobbaji's behalf for damages that had occurred due to a kitchen pipe leak that occurred on June 23, 2014. Ms. Kruger sent Citizens a letter of representation with a signature of Romanos Tobbaji and dated June 23, 2014.

On June 27, 2014, Ms. Wendy Taylor, a Citizens Field Adjuster, inspected the property in the presence of Ms. Diaz de Villegas. Ms. Diaz de Villegas stated that the property was recently vacated by the tenant due to the water event. Ms. Taylor noted that the plumber damaged the flooring to access the failed water line that was under the kitchen slab.

On July 2, 2014, Ms. Taylor conducted a recorded interview with Mr. Tobbaji via telephone. He stated that he acquired the property in April of 2014. Mr. Tobbaji added that the property had been occupied by tenants for six months. On the morning of June 23, 2014, he was notified by said unnamed tenant that there was water all over the kitchen and living room floor. Mr. Tobbaji contacted a handyman that responded to make repairs.

On July 3, 2014, The Rubicon Group sent Citizens a handwritten receipt dated June 24, 2014, that detailed plumbing work performed at Mr. Tobbaji's rental property. It should be noted that the handwritten receipt is consistent with receipts submitted by the Rubicon Group in other insurance claims.

On August 27, 2014, Ms. Kruger sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$61,172.67 for the damages that occurred at Mr. Tobbaji's rental property on June 23, 2014.

Page 16 of 68

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Judge's Initials [Signature]



On October 2, 2014, Mr. Patrick Perez, a Citizens Task Appraiser, conducted a re-inspection of the property witnessed by Ms. Diaz de Villegas. Mr. Perez noted that the property had been gutted prior to the inspection.

On December 22, 2014, The Morgan Law Group sued Citizens on Mr. Tobbaji's behalf.

Citizens Property Insurance Company issued several checks in payment for the claims resulting in an approximate payout of fifty thousand seven hundred and sixty-four dollars and ninety-six (\$50,764.96).

<b>DATE</b>	<b>PAYEE</b>	<b>AMOUNT</b>
7/26/2014	Romanos Tobbaji/Benworth Capital Partners/ The Rubicon Group	\$15,764.96
3/19/2015	Romanos Tobbaji/The Rubicon Group/ Jose Rodriguez/Igancio Soler	\$30,000.00
3/29/2015	Romanos Tobbaji/The Rubicon Group/ The Morgan Law Group	\$ 5,000.00

**DATE OF LOSS:** June 24, 2014  
**INCIDENT ADDRESS:** 9142 NW 114 ST, Hialeah, FL  
**HOME OWNER:** Luis Pato & Yoanet Cobiella  
**CARRIER:** Citizens (Claim # 001-00-010821)  
**TYPE OF LOSS:** Residential

On Monday, June 16, 2014, Ms. Alessandra Kruger created a blank appraisal contract with just Luis Pato's information filled into the appropriate blanks. Ms. Kruger then scheduled Ms. Diaz de Villegas to meet with Mr. Pato at his residence on June 17, 2014, for the "First Inspection".

Page 17 of 68

Affiant's Initials JP

ASA Initials J.P.

Judge's Initials AY

On June 23, 2014, Ms. Kruger scheduled Mr. Exposito to respond to Mr. Pato's home on the following day, June 24, 2014 at 2 pm for plumbing services.

On Tuesday, June 24, 2014, Ms. Kruger contacted Citizens to file a claim on behalf of Mr. Pato for water damages that had occurred at his residence on Tuesday, June 24, 2014. Ms. Kruger sent Citizens a signed Letter of Representation dated June 24, 2014. Ms. Kruger provided Citizens with a plumber's invoice also dated June 24, 2014.

On Thursday, July 10, 2014, Ms. Yoanet Cobiella provided a recorded statement to Citizen's Field Adjuster Mr. Nicolas Saulle in which Ms. Cobiella stated that on the afternoon of June 24, 2014, she discovered standing water on the kitchen floor. Her husband, Mr. Pato, then called a plumber who responded the same day and repaired a supply line under the slab in the kitchen.

On Monday, November 17, 2014, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$42,843.44.

Citizens Property Insurance Company issued several checks in payment for this claim resulting in an approximate payout twenty-eight thousand nine hundred twenty-four dollars (\$28,924):

DATE	PAYEE	AMOUNT
7/28/2014	Luis Pato/Yoanet Cobiella/Wells Fargo Bank NA 936 ISAOA/The Rubicon Group	\$ 4,259.35
9/25/2014	Luis Pato/Yoanet Cobiella/Wells Fargo Bank NA 936 ISAOA/The Rubicon Group	\$16,386.18
01/27/2015	Luis Pato/Yoanet Cobiella/Wells Fargo Bank NA 936 ISAOA/The Rubicon Group	\$ 8,278.47

**DATE OF LOSS:** July 16, 2014  
**INCIDENT ADDRESS:** 9686 Fontainebleau Blvd Apt 505 Miami, FL  
**HOME OWNER:** Alain Marichal  
**CARRIER:** Citizens (Claim # 001-00-013369)

Page 18 of 68

Affiant's Initials AP

ASA Initials S.P.

Judge's Initials AM

**TYPE OF LOSS:**

**Residential**

On Thursday, July 10, 2014, Mr. Alain Marichal provided Ms. Valdespino Rodriguez with a copy of his current homeowner's insurance policy via email. It should be noted that the coverage of said policy had been increased the previous day. Alessandra Kruger responded to his email stating, "I have shown your Personal Policy Change Request form to Barbie, and she says that it is perfect. In the meantime, to get all of your information and to get the claim process started you can send me the insurance policy that you currently have. And as soon as you receive your new policy please send it to me. "

On Friday, July 11, 2014, Ms. Kruger send Mr. Marichal a contract for representation and a client information sheet. Ms. Kruger explained to Mr. Marichal that as soon as he signed and return the documents she would be able to send Mr. Rafael Exposito to his home "to do the plumbing". Mr. Marichal replied, "Understood, thanks"

On Tuesday, July 15, 2014, Ms. Kruger directed Mr. Exposito to respond to Mr. Marichal's residence on July 16, 2014, for a "Loss Assessment Inspection".

On Thursday, July 17, 2014, Ms. Kruger contacted Citizens to file a claim on behalf of Mr. Marichal for water damages that had occurred in between the kitchen and bathroom of his residence on July 16, 2014. Ms. Kruger sent Citizens a signed Letter of Representation dated July 16, 2014.

On Thursday, July 24, 2014, Ms. Emory Bullard, Field Adjuster for Citizens, conducted an inspection of Mr. Marichal's home witnessed by Ms. Diaz de Villegas.

On July 25, 2014, Ms. Bullard obtained a recorded statement from Mr. Marichal in which he stated that he arrived home from work and noticed water on the kitchen and bathroom floor. He then called a friend who recommended a plumber. The plumber responded the same day, opened the wall and changed a supply line.

On Tuesday, August 26, 2014, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$22,299.00 for the damages that occurred on July 16, 2014.

Page 19 of 68

Affiant's Initials JB

ASA Initials S.P.

Judge's Initials AY

Citizens Property Insurance Company issued several checks in payment for the fraudulent claims resulting in an approximate payout of eleven thousand one hundred forty-three dollars and two cents (\$11,143.02).

DATE	PAYEE	AMOUNT
7/31/2014	Alain Marichal/Bank of America/and the Rubicon Group	\$ 6,601.30
10/14/2014	Alain Marichal/Bank of America/and the Rubicon Group	\$ 4,541.72

**INCIDENT ADDRESS:** 2390 SW 15 ST Miami, FL  
**HOME OWNER:** Eloina Ramos  
**CARRIER:** Citizens (Claim #001-00-014642)  
**TYPE OF LOSS:** Residential

According to the Rubicon Group records, Ms. Eloina Ramos was referred by Mr. Jose Gonzalez, Ms. Diaz de Villegas' father.

On Wednesday, July 23, 2014, Ms. Romy Valdespino Rodriguez notified Mr. Rafael Exposito via email to respond to Ms. Ramos' residence on July 24, 2014 for a "Loss Assessment Inspections" due to a broken pipe in her bathroom. Mr. Exposito was instructed to call Ms. Diaz de Villegas upon his arrival.

On Thursday, July 24, 2014, Ms. Valdespino Rodriguez added the Loss Assessment Appointment to the public calendar.

On Monday, July 28, 2014, Ms. Alessandra Kruger contacted Citizens to file a claim on Ms. Ramos' behalf for water damages that had occurred during a bathroom leak that occurred on July 25, 2014. Ms. Valdespino Rodriguez sent Citizens a signed Letter of Representation dated July 25, 2014.

On Monday, August 4, 2014, Ms. Tina Cowell, Citizens Field Adjuster, met with Ms. Diaz de Villegas and Ms. Ramos at her residence to conduct an inspection. Ms. Cowell also obtained a recorded statement from Ms. Ramos in which she stated that she arrived home from work around 1:00 p.m. and discovered water on the bathroom floor. She then called a plumber referred to her by her neighbor. The plumber informed her that the drain line was deteriorated and proceeded to make repairs.

Page 20 of 68

Affiant's Initials BR

ASA Initials J-R

Judge's Initials AT

On Friday, August 22, 2014, a handwritten receipt dated July 25, 2014, for plumbing work performed at Mr. Ramos' residence was submitted to Citizens in support of the claim. The receipt lacked any identifying information regarding the plumber or the plumbing company who may have performed the work. Especially of note, are the receipts dated June 24, 2014 for AARCO leak detection and multiple store receipts for plumbing parts purchased at Home Depot and Stern Brothers Plumbing on June 24, 2104.

On Monday, October 13, 2014, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$45,649.38 created by Mr. Jose Gonzalez, for the damages that occurred in Ms. Ramos' home on July 25, 2014.

Citizens Property Insurance Company issued several checks in payment for the claims resulting in an approximate payout of seventeen thousand one hundred sixty-eight dollars and ninety-two cents (\$17,168.92).

DATE	PAYEE	AMOUNT
8/25/2014	Eloina Ramos/The Rubicon Group	\$ 12,668.92
12/9/2014	Eloina Ramos/The Rubicon Group	\$ 4,500.00

<b>DATE OF LOSS:</b>	<b>August 4, 2014</b>
<b>INCIDENT ADDRESS:</b>	<b>5781 NW 191<sup>st</sup> Terrace, Hialeah, FL 33015</b>
<b>HOME OWNER:</b>	<b>Rafael Exposito</b>
<b>CARRIER:</b>	<b>Tower Hill (Claim # 2800136265)</b>
<b>TYPE OF LOSS:</b>	<b>Residential – Water</b>

Rafael Exposito is the owner and operator of Relwood Restoration Corp., and is Ms. Diaz de Villegas' business associate.

In 2009, Mr. Exposito filed a claim with Citizens (claim # 309812, Date of Loss, August 7, 2009) in which he alleged that a dropped hammer caused damage to the tile flooring of his home. Citizens issued Mr. Exposito two checks totaling \$44,564.11 for removal and replacement of tile floors. It should be noted that he was represented by Ms. Diaz de Villegas for the claim.

Page 21 of 68

Affiant's Initials   *JE*  

ASA Initials   *J.P.*  

Judge's Initials   *AS*

On July 28, 2014, Mr. Exposito communicated with Ms. Diaz de Villegas via text messages and sent her an image of his insurance policy.

On August 4, 2014, Mr. Exposito sends pictures of his kitchen to Ms. Diaz de Villegas. The images of the cabinets in his kitchen clearly exhibited signs of long term damage and age-related wear and tear. Ms. Diaz de Villegas replied, "Clean all that out." He then sent pictures of the cabinets with different tow kicks and Ms. Diaz de Villegas replied, "looks like it matches good."

On August 5, 2014, Alessandra Kruger contacted Tower Hill to file a claim on Mr. Exposito's behalf for damages that occurred after a kitchen pipe leak at his residence on August 4, 2014. Ms. Kruger sent Tower Hill a signed Letter of Representation signed by Mr. Exposito and dated August 4, 2014.

On August 7, 2014, Walter Swoop, an independent field adjuster contracted by Tower Hill, inspected the property in the presence of Ms. Diaz de Villegas. Mr. Swoop noted that per Ms. Diaz de Villegas, the tile flooring was installed when the home was purchased in 2005. She explained that Mr. Exposito was in the construction business and made repairs himself. Ms. Diaz de Villegas further explained that Mr. Exposito dried the area himself. Mr. Swoop noted that no receipts were provided at the time of the inspection. The photographs taken by Mr. Swoop show that the kitchen floor was trenched to expose plumbing.

On August 19, 2014, Ms. Kruger sent Tower Hill the estimate for repairs in the amount of \$81,586.46.

On September 4, 2014, Mr. Swoop met with Mr. Exposito at the property and obtained a small sample of tile flooring.

On October 21, 2014, Tower Hill requested a re-inspection of the property and disputed the amount of the estimate submitted by The Rubicon Group.

On October 21, 2014, Bob Davis, an independent field adjuster contracted by Tower Hill, conducted another inspection of Mr. Exposito's home in the presence of Ms. Diaz de Villegas. Mr. Davis and Ms. Diaz de Villegas agreed on an amount to settle the claim.

Page 22 of 68

Affiant's Initials DB

ASA Initials S.P.

Judge's Initials AV

It should be noted that the flooring damage claimed in the Tower Hill claim is the same flooring that Citizens paid for in 2011.

Tower Hill issued several checks in payment for the claim resulting in an approximate payout of forty-one thousand five hundred dollars (\$41,500).

<b>DATE</b>	<b>PAYEE</b>	<b>AMOUNT</b>
9/11/2014	Rafael Exposito / Bank of America, NA / The Rubicon Group Corp	\$29,029.51
11/07/2014	Rafael Exposito / Bank of America, NA /	\$12,470.49

<b>DATE OF LOSS:</b>	<b>August 20, 2014</b>
<b>INCIDENT ADDRESS:</b>	<b>1601 SW 139 CT Miami, FL</b>
<b>HOME OWNER:</b>	<b>Manuel Sanchez</b>
<b>CARRIER:</b>	<b>Citizens (Claim # 001-00-017411)</b>
<b>TYPE OF LOSS:</b>	<b>Residential</b>

On Wednesday, July 30, 2014, Ms. Romy Valdespino Rodriguez emailed Mr. Ricardo Alvarez from DeZayas Insurance Agency, to inquire about the status of Mr. Manuel Sanchez's homeowner's policy in order to proceed with the claim.

On Thursday, July 31, 2014, Mr. Alvarez replied to Ms. Valdespino Rodriguez to advise that the policy would not be effective until August 4, 2014.

On August 14, 2014, Ms. Valdespino Rodriguez emailed Mr. Rafael Exposito requesting him to respond to Mr. Sanchez's home on the following day, August 15, 2014, at 9:30 a.m., for a water leak due to a broken pipe in the kitchen.

On August 15, 2014, Ms. Valdespino Rodriguez changed the plumbing appointment to August 19, 2014. Mr. Exposito acknowledged the change.

On Monday, August 21, 2014, Ms. Valdespino Rodriguez contacted Citizens to file a claim on behalf of Mr. Sanchez for water damages that had occurred in the kitchen area of his residence on August 20, 2014. Ms. Valdespino Rodriguez sent Citizens a signed Letter of

Page 23 of 68

Affiant's Initials RP

ASA Initials S.P

Judge's Initials AM

Representation dated August 20, 2014. Ms. Kruger provided Citizens with a plumber's invoice "Handyman Services (305) 244-7952" also dated April 20, 2014. The phone number on the invoice belongs to Mr. Exposito.

On August 30, 2014, Mr. Sanchez provided a recorded statement to Citizen's Field Adjuster Mr. Ricardo Tello in which Mr. Sanchez stated that on afternoon of August 20, 2014, he found water coming from under the kitchen cabinet. He then called a friend who recommended a plumber that responded the same day and repaired a supply line after removing tiles from the floor.

On Monday, October 27, 2014, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$65,496.07 for the damages that occurred on August 20, 2014.

Citizens Property Insurance Company issued several checks in payment for the claim resulting in an approximate payout of thirty-six thousand four hundred thirty dollars and ninety-three cents (\$36,430.93).

<b>DATE</b>	<b>PAYEE</b>	<b>AMOUNT</b>
9/8/2014	Manuel Sanchez/Everhome Mortgage ISAOA/ The Rubicon Group	\$ 2,509.08
10/3/2014	Manuel Sanchez/Everhome Mortgage ISAOA/ The Rubicon Group	\$23,921.85
12/2/2014	Manuel Sanchez/Everhome Mortgage ISAOA/ The Rubicon Group	\$10,000.00

**DATE OF LOSS:** August 27, 2014  
**INCIDENT ADDRESS:** 15115 SW 140 PL, Miami  
**HOME OWNER:** Steven Diaz (Esteban Diaz)

Page 24 of 68

Affiant's Initials SD

ASA Initials S. R.

Judge's Initials AV



**CARRIER:**  
**TYPE OF LOSS:**

**Citizens (Claim#001-00-018109)**  
**Residential**

Mr. Steven Diaz was referred to The Rubicon Group by Ms. Dorys Alemida who filed a claim with Citizens in which she was represented by The Rubicon Group.

On Thursday, August 21, 2014, Ms. Romy Valdespino Rodriguez scheduled Ms. Diaz de Villegas to respond to Mr. Diaz' later that day for a "First Inspection". Subsequently, Ms. Valdespino Rodriguez made an entry into the Rubicon Group's internal files verifying that the *"first inspection: was completed by Ms. Diaz de Villegas."*

On Wednesday, August 27, 2014, Ms. Valdespino Rodriguez made a second entry into Mr. Diaz's internal file in which she advised Mr. Diaz to, *"please buy a supply line today and keep receipt, claim will be opened with today's date."*

On Wednesday, August 27, 2014, Ms. Valdespino Rodriguez contacted Citizens to file a claim on Mr. Diaz's behalf for water damages that had occurred during a kitchen pipe leak that occurred on that day. Ms. Valdespino Rodriguez sent Citizens a contract for representation signed by Mr. Diaz dated August 27, 2014.

On Thursday, August 28, 2014, Ms. Valdespino Rodriguez sent Citizens the aforementioned Home Depot receipt in support of plumbing work Mr. Diaz performed himself on August 27, 2014.

On Friday, September 5, 2014, Mr. Jonathan Solomons, a Citizens' Field Adjuster, conducted an inspection of the property in the presence of Ms. Diaz de Villegas. Mr. Solomons was informed that water had damaged the lower cabinets caused by a compromised water line that the insured repaired himself.

On Friday, September 19, 2014, Mr. Solomons conducted a recorded interview with Mr. Diaz via telephone. Mr. Diaz stated that his wife woke him up around midnight and informed him there was water on the kitchen floor. He turned off the water and spent the next three hours drying up water. The following day, he purchased the part at Home Depot and made repairs himself.

Page 25 of 68

Affiant's Initials SD

ASA Initials S. P.

Judge's Initials AY

On Monday, October 13, 2014, Ms. Alicia Pardey sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$26,205.41 for the damages that occurred at Mr. Diaz's residence on August 27, 2014.

Citizens Property Insurance Company issued several checks in payment for the fraudulent claims resulting in an approximate payout of fourteen thousand two hundred eighty-two dollars and seventy-four cents (\$14,282.74).

DATE	PAYEE	AMOUNT
9/23/2014	Steven Diaz/Martha Diaz/CitiMortgage The Rubicon Group	\$ 8,870.84
12/10/2014	Steven Diaz Martha Diaz/CitiMortgage The Rubicon Group	\$ 5,411.90

<b>DATE OF LOSS:</b>	September 17, 2014
<b>INCIDENT ADDRESS:</b>	131 NW 190 ST Miami, FL
<b>HOME OWNER:</b>	Emilia Palacio
<b>CARRIER:</b>	Citizens(Claim#001-00-020168 & 001-00-020166)
<b>TYPE OF LOSS:</b>	Residential

According to the Rubicon Group's internal documents, Ms. Emilia Palacio was referred to The Rubicon Group by Ms. Diaz de Villegas father, Jose Gonzalez.

On Thursday, August 7, 2014, Ms. Valdespino Rodriguez scheduled Ms. Diaz de Villegas to respond to Ms. Palacio residence on Monday, August 18, 2014, for the "First Inspection".

On Monday, August 18, 2014, Ms. Valdespino Rodriguez made an entry in the Palacios file indicating that, "*Barbie conducted the inspection and found too much damage on baseboard*". Ms. Diaz de Villegas' opinion was that Mr. Rafael Exposito needed to check it out, as such Ms. Valdespino Rodriguez scheduled a "Loss Assessment Inspection". Subsequently Ms. Valdespino Rodriguez forwarded Ms. Diaz de Villegas a copy of the Palacio's Citizens Insurance policy.

Page 26 of 68

Affiant's Initials AP

ASA Initials J.P.

Judge's Initials JM

On Wednesday, August 20, 2014, Ms. Valdespino Rodriguez scheduled Mr. Exposito to respond to Ms. Palacio's residence on September 8, 2014, for a "Loss Assessment Inspection". Ms. Valdespino Rodriguez communicated to Mr. Exposito the following instructions:

*"There is too much damage on baseboard and in the living room. Wipe them down. For the broken pipe between kitchen and bathroom wall, damaged kitchen cabinets and tile in front of it. Access point is in the bathroom faucet area."*

On Thursday, September 11, 2014, Ms. Valdespino Rodriguez entered: Loss Assessment Appt. was done on 9/10/14 by Rafael and included notes from his report:

*"Customer had water coming out of floor in kitchen area, I accessed through kitchen to find the leak, but leak was higher on the wall with better access through the bathroom, the leak was in the faucet supply line, all damaged parts and mold removed."*

On Friday, September 12, 2014, Ms. Valdespino Rodriguez sent Ms. Diaz de Villegas an email in which she writes: *"Neither of Emilia Palacios originals were signed, I guess I missed that when I showed the contracts to you. Please sign and date them."*

On Wednesday, September 17, 2014, Ms. Alessandra Kruger contacted Citizens to file two claims on behalf of Ms. Palacio for water damages that had occurred during a kitchen leak and due to a broken pipe in the bathroom of her residence on September 17, 2014. Ms. Kruger sent Citizens two signed Letters of Representation dated September 17, 2014. Ms. Kruger also submitted a handwritten plumber's receipt that lacked any information that would identify who performed the work.

Located within The Rubicon Group's internal files for the Palacios claim was a blank "Proof of Loss" form signed by Ms. Palacio.

On Wednesday, September 24, 2014, Mr. Brian Bahn, Field Adjuster for Citizens, inspected the property witnessed by Mr. Jose Gonzalez. Mr. Bahn noted that the damage in the kitchen was due to long term exposure to moisture and that the damage to the shingles was not consistent with wind damage. Further, that the damage to the ceiling in the living room was due to exposure to rainwater as a result of long-term wear.

Page 27 of 68

Affiant's Initials JP

ASA Initials JP

Judge's Initials AM

On Monday, October 6, 2014, Mr. Bahn obtained an in person recorded statement from Ms. Palacios who stated that she arrived home and saw water on her kitchen floor that was coming from the bathroom wall. Her friend Jose, Ms. Diaz de Villegas father, referred her to a handyman whom she contacted. The handyman responded the same day, made repairs, and provided an invoice for the repairs he made. She also called the public adjuster on the same day.

On Friday, October 10, 2014, the claim for the broken pipe in the bathroom was denied due no coverage under policy for constant and repeated leakage over a period of time.

On Monday, November 3, 2014, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$18,530.69 for the roof damages that occurred on September 17, 2014.

On Wednesday, December 10, 2014, The Morgan Law Group sued Citizens on Ms. Palacios' behalf for the damages that occurred on September 17, 2014, in the bathroom. Damages amount Public Adjuster estimate for damages \$35,848.63.

<b>DATE</b>	<b>PAYEE</b>	<b>AMOUNT</b>
12/15/2014	Emilia Palacio/The Rubicon Group	\$ 2,500.00

<b>DATE</b>	<b>PAYEE</b>	<b>AMOUNT</b>
9/8/2015	Emilia Palacio/The Morgan Law Group	\$ 5,000.00
9/8/2015	Emilia Palacio/The Rubicon Group/Bank of America	\$ 5,000.00

<b>INCIDENT ADDRESS:</b>	19582 NW 55 Circle Place Miami, FL
<b>HOME OWNER:</b>	Fanny Rosales
<b>CARRIER:</b>	Citizens (Claim #001-00-020412)
<b>TYPE OF LOSS:</b>	Residential

According to the Rubicon Group's internal documents, Ms. Fanny Rosales was referred to The Rubicon Group by Mr. Rolando Aguilar, who also had several claims with Rubicon.

On Wednesday, September 3, 2014, Ms. Romy Valdespino Rodriguez prepared a Homeowners Estimating and Appraisal Corp contract with Ms. Rosales' information on it and emailed it to her at fanny.rosales@comcast.net.

Affiant's Initials FR

ASA Initials R-P

Judge's Initials AM

On Thursday, September 4, 2014, Ms. Valdespino Rodriguez made an entry in the Rubicon Group's internal files reflecting that Mr. Jose Gonzalez had completed the "First Inspection" at the Rosales residence which he documented by notes and photographs.

On Thursday, September 11, 2014, Ms. Valdespino Rodriguez scheduled Mr. Rafael Exposito to respond to the Rosales home on September 15, 2014, for a "Loss Assessment Inspection", due to an unspecified water leak. Along with the appointment Ms. Valdespino Rodriguez provided Mr. Exposito with the following set of instructions:

- *Insured had a leak from the water heater*
- *Husband will replace with new one because they can't wait*
- *Check all water heater lines and access any line to be repaired*
- *"Leave it exposed"*

Mr. Exposito acknowledged the orders via email.

On Friday, September 12, 2014, Ms. Valdespino Rodriguez sent Ms. Diaz de Villegas an email in which she listed details regarding several claims including Ms. Rosales' claim and in which she inquired, "*What date of loss I write, I put 9/18/14 but I'm waiting on your response.*"

On Monday, September 15, 2015, Ms. Valdespino made another entry onto Ms. Rosales' Status Sheet in which she noted that she was waiting for a report from Mr. Exposito regarding the work he had performed at Ms. Rosales' home, specifically that he replaced a broken piece.

On Friday, September 19, 2014, Ms. Alessandra Kruger contacted Citizens to file a claim on Ms. Rosales' behalf for damages that had occurred due to a water heater leak on September 18, 2014. Ms. Kruger sent Citizens a contract for representation dated September 18, 2014.

On Friday, September 26, 2014, Mr. Larry Carver, a Citizens' Field Adjuster, conducted an inspection of the property in the presence of Ms. Diaz de Villegas and the insured's mother. Mr. Carver noted that he had noted recurved invoices regarding repairs from the insured but that Ms. Diaz de Villegas would send a plumbing repair invoice.

Affiant's Initials   *RV*  

ASA Initials   *J-P*  

Judge's Initials   *AD*

On the same day, Ms. Kruger entered notes onto the Status Sheet indicating that Ms. Rosales was instructed to provide a receipt for the purchase of a new water heater. Ms. Rosales explained that the water heater was given to her husband by his boss in exchange for some work that had been done. It was then decided that a written statement would be created in place of the original receipt.

On Tuesday, October 28, 2014, The Rubicon Group sent Citizens a receipt for a hot water heater purchased from Next Plumbing Supply by Edgar Zimbelmann on September 6, 2014.

On Wednesday, October 29, 2014, Mr. Carver noted within the claim file that Ms. Rosales had stated that on the date of loss, she discovered water on the floor and traced it to the water heater. Ms. Rosales advised that the water heater was then replaced.

On Friday, December 19, 2014, Ms. Valdespino Rodriguez sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$40,190.02 for the damages that occurred at Ms. Rosales' residence on September 18, 2014.

Citizens Property Insurance Company issued several checks in payment for the claims resulting in an approximate payout of twelve thousand six hundred fifty-one dollars and thirteen cents (\$12,651.13).

<b>DATE</b>	<b>PAYEE</b>	<b>AMOUNT</b>
10/29/14	Fanny Rosales/JP Morgan Chase/ The Rubicon Group	\$ 2,651.13
4/17/2015	Fanny Rosales/JP Morgan Chase/ The Rubicon Group	\$10,000.00

<b>DATE OF LOSS:</b>	<b>October 23<sup>rd</sup>, 2014</b>
<b>INCIDENT ADDRESS:</b>	<b>19880 SW 123 AV, Miami, Florida 33177</b>
<b>HOME OWNER:</b>	<b>Alfredo Quinonez, W/M, DOB 2/11/62</b>
<b>CARRIER:</b>	<b>Citizens (Claim # 001-00-024191)</b>
<b>TYPE OF LOSS:</b>	<b>Residential</b>

On Monday, September 29, 2014, Ms. Romy Valdespino Rodriguez scheduled Ms. Diaz de Villegas for the "First Inspection" at Alfredo Quiñonez's home for Wednesday, October 15th,

Page 30 of 68

Affiant's Initials   *RP*  

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2014. Also, Ms. Valdespino Rodriguez ordered Mr. Rafael Exposito to perform the "Loss Assessment Inspection" at Alfredo Quiñonez's home, on Thursday, October 23, 2014. On the same day, Ms. Valdespino Rodriguez received an email from Mr. Ricardo Alvarez of DeZayas Insurance Agency titled "Alfredo Quiñonez" with the comment, "SEE POLICY. THANKS RICK."

On Thursday, October 23, 2014, Ms. Alessandra Kruger contacted Citizens to file a claim on behalf of Mr. Quiñonez for water damages that had occurred at his residence on Thursday, October 23, 2014.

Subsequently, The Rubicon Group faxed to Citizens a signed Letter of Representation dated Thursday, October 23, 2014. In addition, The Rubicon Group prepared and presented several documents in furtherance of this insurance claim including a handwritten plumber's invoice (959251) for repairs conducted at the insured's residence dated Thursday, October 23, 2014.

It should be noted that the book from which the plumber's receipt was written was seized by your Affiant during the search of The Rubicon Group's office. A receipt with the same serial number was used in support of a separate Citizens claim for a different home owner named Carlos Del Valle. It appeared as though the original blank receipt had been photocopied to be used more than once.

Mr. Quinonez provided two separate recorded statements to Citizens' interviewers:

- 1) Thursday, November 6, 2014 to Field Adjuster Alvaro Chavez
- 2) Wednesday, December 17, 2014 to Special Investigations Unit (SIU) Investigator Charles Beall.

Mr. Quinonez stated that he discovered the leak on Thursday, October 23, 2014, at 3:00 p.m., when he arrived home from work, and contacted a plumber using information he obtained from a business card. According to Mr. Quiñonez a person named "Rafael" and his male companion, "Johnny" responded the same day and made repairs. He then called the public adjuster for assistance to file the claim.

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The following correspondence connected with the claim at hand, was obtained as a result of the search conducted at The Rubicon Group:

*On Friday, February 13, 2015, Ms. Romy Valdespino Rodriguez wrote:*

*Good morning Ricardo,  
As per previously discussed with Barbie, please find all the information needed in order for you to do the estimate.*

*If you have any questions you can reach Barbie on her cell..."*

*"Insured: Alfredo & Mario Quinonez*

*Type of Loss: BPK. Broken pipe kitchen damaged kitchen cabinets & floor."*

*Mr Ricardo Tello wrote:*

*Barbie,*

*Here is the estimate for Alfredo Quinonez. There is not much information in the bathroom as to if we need to detach and reset a vanity or pedestal sink or tub. Insurance estimate is at 14, 949.84. Attached estimate is for \$24,780.60. I tried adding as much as I could without knowing what is at the property. Also, the copy of the estimate is blurry on the sketch and dimensions are hard to impossible to see so I did them based on the actual SF of each room.*

*I added for cleaning items but I am not sure if they are or are not in the property. If you can please send me a sample estimate (one of the ones we have worked on) to see what you normally add to the estimate.*

*Please let me know your thoughts and any changes you want me to make:*

*Thanks,*

*Ricardo*

*Ms. Barbara Diaz de Villegas wrote:*

*Thank you Ricardo. I will review it and let you know if there is anything else. You can also play with pricing-sometimes that's the main difference.*

Page 32 of 68

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ASA Initials J.P.

Judge's Initials AM



Romy, send him a recent estimate on a similar lost. Jogly Quintanilla would be a good one.

Thanks!

It should be noted that Jogli and Jaqueline Quintanilla filed an insurance claim with Citizens on November 11, 2014.

On Friday, February 20, 2015, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an attachment for an estimate totaling \$22,280.60.

Citizens Insurance Company eventually issued several checks in payment for this fraudulent claim resulting in an approximate payout of eighteen thousand six hundred and fifty-one dollars and sixty-one cents (\$18,651.61):

DATE	PAYEE	AMOUNT
01/13/2015	Alfredo Quinonez/Mario Quinonez/The Rubicon Group	\$12, 449.84
01/13/2015	Alfredo Quinonez/Mario Quinonez/The Rubicon Group	\$ 1,661.15
04/02/2015	Alfredo Quinonez/Mario Quinonez/The Rubicon Group	\$ 4540.62

<b>DATE OF LOSS:</b>	November 4, 2014
<b>INCIDENT ADDRESS:</b>	3101 N Country Club DR Apt 110 Aventura, FL
<b>HOME OWNER:</b>	Maria Gaffaro
<b>CARRIER:</b>	Citizens (Claim # 001-00-025233)
<b>TYPE OF LOSS:</b>	Residential

According to The Rubicon Group "Status Claim Sheet" Ms. Maria Gaffaro was referred to The Rubicon Group by an individual named Jerry Suarez. An entry was made in the documents highlighting: *first floor leak but lady has no insurance*. On Thursday, October 2, 2014, Ms. Diaz de Villegas directed Ms. Gaffaro to contact Mr. Ricardo Alvarez of DeZayas Insurance Agency to obtain a policy. Internal documents indicate that as soon as she obtains a homeowners policy they could file a claim.

Page 33 of 68

Affiant's Initials   *AG*  

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Judge's Initials   *AG*

On Tuesday, October 7, 2014, Ms. Valdespino Rodriguez scheduled Ms. Diaz de Villegas to conduct a "First Inspection" at Ms. Gaffaro's home.

On Thursday, October 9, 2014, Ms. Gaffaro advised Ms. Valdespino Rodriguez that she had found another water leak in the bathroom but the condo plumber was going to repair it. Ms. Valdespino Rodriguez instructed Ms. Gaffaro to take pictures and forward her a detailed report.

On Friday, October 17, 2014, Ms. Valdespino Rodriguez directed Mr. Rafael Exposito to respond to Ms. Gaffaro's residence on October 23, 2014, to handle a water leak in the kitchen. According to the message Ms. Valdespino Rodriguez provided Mr. Exposito with the following information: *"The wall has been accessed, pipe doesn't have a cap. Call Barbie once you are there."*

On Tuesday, October 28, 2014, Ms. Valdespino Rodriguez scheduled Mr. Exposito to return to Ms. Gaffaro's residence to conduct a Loss Assessment Inspection.

On Tuesday, November 4, 2014, Ms. Alessandra Kruger contacted Citizens to file a claim on behalf of Ms. Gaffaro for water damages that had occurred at her residence on Tuesday, November 4, 2014. Ms. Kruger sent Citizens a signed Letter of Representation, dated November 4, 2014.

On Thursday, December 18, 2014, Ms. Alicia Pardey provided Citizens with a plumber's invoice dated November 4, 2014. The receipt in question was supposedly prepared by a person named "Johnny" for the following repairs performed at Ms. Gaffaro's home.

1. Leak detection \$25.00
2. Change kitchen supply lines under the sink \$100.00

Ms. Gaffaro's claim was flagged and referred to SIU due to the fact that the loss occurred 3 days after the policy became effective (within 30 days of policy inception). The file was assigned to SIU Investigator Charles Beall.

On Tuesday, January 27, 2015, Ms. Gaffaro provided a recorded statement to Citizen's Investigator, Mr. Beall. Ms. Gaffaro stated that she discovered the leak on November 4, 2014, upon returning home from work. According to Ms. Gaffaro the water was flowing out the front

Page 34 of 68

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ASA Initials JP

Judge's Initials CH

door of her apartment and the adjacent window. She then called a plumber which was recommended by her friend Consuelo that responded the same day. Ms. Gaffaro was unclear as to how she obtained the Public Adjuster. At this point Ms. Diaz de Villegas, who was present during the interview, interjected saying that Ms. Gaffaro had contacted her insurance agent under the assumption that he was an Adjuster. In turn, the agent furnished Ms. Gaffaro with the contact information for several Public Adjuster firms. Ms. Diaz de Villegas further explained that The Rubicon Group was the first to get in touch with Ms. Gaffaro.

On Monday, February 9, 2015, Mr. Beall took an additional recorded statement from Ms. Gaffaro to clarify details regarding the loss.

On Thursday, February 12, 2015, Mr. Beall visited DeZayas Insurance Agency and spoke to Mr. Alvarez. Mr. Alvarez stated that he sent the policy contract to the insured via email which she signed, dated, and returned to him. The insured had a 30 day wait and the policy took effect on November 1, 2014.

On Friday, February 13, 2015, Mr. Beall contacted Ms. Alessandra Duffy, the realtor Ms. Gaffaro contracted to sell the property which was listed for sale on October 29, 2014.

On Wednesday, February 18, 2015, Mr. Beall took an additional recorded statement from Ms. Gaffaro and asked her why she listed the property for sale on October 29, 2014. Ms. Gaffaro was not able to explain.

Investigator Beall uncovered that Ms. Gaffaro's property had not been insured for approximately 10 years prior to the new policy taking effect on November 1, 2014. Also that coincidentally the damage occurred just 3 days after the policy's inception. Mr. Beall made several attempts to contact the alleged plumber named "Johnny" meeting with negative results. There was no answer at the tentative phone numbers provided by Ms. Diaz de Villegas.

On Tuesday, April 28, 2015, a law suit against Citizens was filed on Ms. Gaffaro's behalf by Tabares Law, P.A. alleging bad faith and unnecessary delays.

On Friday, June 19, 2015, The Rubicon Group sent Citizens an estimate totaling \$33,062.62 for the alleged damages that occurred on November 4, 2014.

Page 35 of 68

Affiant's Initials   B  

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Citizens Property Insurance Company issued several checks in payment for the claim resulting in an approximate payout of twenty-nine thousand dollars (\$29,000).

DATE	PAYEE	AMOUNT
11/21/2015	Maria Gaffaro/Tabares Law, P.A./ The Rubicon Group	\$24,000.00
11/21/2015	Maria Gaffaro/Tabares Law, P.A./ The Rubicon Group	\$ 5,000.00

DATE OF LOSS: [REDACTED]  
INCIDENT ADDRESS: [REDACTED]  
HOME OWNER: [REDACTED]  
CARRIER: [REDACTED] (33)  
TYPE OF LOSS: Residential

[REDACTED] was referred to The Rubicon Group by Mr. Misael Farinas who was also a homeowner that had filed a water claim with Citizens assisted by The Rubicon Group.

On Tuesday, November 4, 2014, Ms. Valdespino Rodriguez contacted [REDACTED] and requested a copy of her homeowner's insurance policy. Ms. Valdespino Rodriguez also confirmed an appointment for Ms. Diaz de Villegas to meet [REDACTED] at her home on November 6, 2014, for an inspection. Ms. Valdespino Rodriguez then scheduled Mr. Rafael Exposito to respond to [REDACTED]'s home on November 12, 2014, for "Loss Assessment Inspection."

On Tuesday, November 6, 2014, handwritten notes as well as a diagram depicting an inventory of damages encountered at [REDACTED]'s residence were scanned and made part of The Rubicon Group's electronic data under [REDACTED]'s claim file.

On Monday, November 14, 2014, Ms. Alessandra Kruger contacted Citizens to file a claim on behalf of [REDACTED] for water damages that had occurred in the kitchen area of her residence on Saturday, November 12, 2014. Ms. Kruger sent Citizens a signed Letter of Representation dated November 12, 2014. Ms. Kruger provided Citizens with a plumber's invoice also dated November 12, 2014.

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Judge's Initials [Signature]

On Sunday, January 25, 2015, [REDACTED] provided a recorded statement to Citizen's Field Adjuster, Mr. Michael Selph, in which [REDACTED] stated that she arrived home from work on November 12, 2014, and found water in her kitchen and dining room. She then called a friend who called a plumber that she knew. The plumber responded to her home, and found water coming up from the floor. The plumber broke open the slab and repaired the line. [REDACTED] stated she dried the area herself with a broom and a mop.

On Monday, February 10, 2015, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an attachment for an estimate totaling \$44,792.65 for the damages that occurred on November 12, 2014.

Citizens Property Insurance Company issued several checks in payment for the claim resulting in an approximate payout of thirty thousand thirty-four dollars and eighteen cents (\$30,034.18).

DATE	PAYEE	AMOUNT
[REDACTED]	Citidat Miami/Dank Citidat NA ISAOA ATIMA/	[REDACTED]
[REDACTED]	The Rubicon Group	[REDACTED]
[REDACTED]	Citidat Miami/Dank Citidat NA ISAOA ATIMA/	[REDACTED]
	Miami-Dade Economic Advocacy Trust ISAOA ATIM/	
	The Rubicon Group	

**DATE OF LOSS:** November 12, 2014  
**INCIDENT ADDRESS:** 10242 SW 16<sup>th</sup> Street, Miami, FL 33165  
**HOME OWNER:** Ibrahim Velasquez  
**CARRIER:** Tower Hill (Claim # 2800142392)  
**TYPE OF LOSS:** Residential – Water

According to the Rubicon Group's internal documents, Ibrahim Velasquez was referred to The Rubicon Group by Teresa Hernandez.

On Tuesday, August 19, 2014, Mr. Velasquez obtained a copy of his insurance policy from Seguralia Insurance Agency.

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On Thursday, October 23, 2014, Mr. Velasquez forwarded the policy as an attachment to The Rubicon group. On that same day, Romy Valdespino Rodriguez emailed Ms. Hernandez to let her know that the inspection for Mr. Velasquez's home was scheduled for that day at 2:30 p.m.

Ms. Valdespino Rodriguez then made the following entry into the Status Sheet that corresponds with Mr. Velasquez's claim file: "1<sup>st</sup> inspection scheduled for today. (advised insured to put tarp on roof and to cover black stains in the roof) Jose went to inspection, photos are on file."

On Wednesday, November 12, 2014, Ms. Valdespino Rodriguez made another entry in which she noted, "claim was opened."

On Thursday, November 13, 2014, Ms. Kruger contacted Tower Hill to file a claim on Mr. Velasquez's behalf for water damages that had occurred after a roof leak at his residence on November 12, 2014. Ms. Kruger sent Tower Hill a Letter of Representation signed by Mr. Velasquez and dated November 12, 2014.

On Thursday, November 20, 2014, Juan Velasquez, Field Adjuster for Tower Hill met with Mr. Velasquez and Ms. Diaz de Villegas at Mr. Velasquez's home and conducted an inspection. According to Mr. Juan Velasquez's notes, he documented that there was water damage caused by a roof leak and noted mold growth above the dining room area.

On Thursday, November 20, 2014, Alicia Pardey updated the Status Sheet with the following entry: "*Adjuster appt done. Insured did not clean the black spots and tarp was not on the way it was instructed to do, most likely it will get denied and will have to go to MLG.*"

On Tuesday, January 13, 2015, Ms. Pardey sent Tower Hill a letter a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$17,895.64 for the damages that occurred November 12, 2014.

Tower Hill issued several checks in payment for the claim resulting in an approximate payout of eleven thousand four hundred eighty-six dollars and forty-seven cents (\$11,486.47).

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DATE	PAYEE	AMOUNT
12/04/2014	Ibrahim Velasquez / JPMorgan Chase NA / The Rubicon Group Corp	\$8,059.97
01/26/2015	Ibrahim Velasquez / JPMorgan Chase NA / The Rubicon Group	\$3,426.50

**DATE OF LOSS:** November 11, 2014  
**INCIDENT ADDRESS:** 5850 NW 191 TR, Miami, FL  
**HOME OWNER:** Jogli & Jacqueline Quintanilla  
**CARRIER:** Citizens (Claim#001-00-026123)  
**TYPE OF LOSS:** Residential

Mr. Jogli Quintanilla has been represented by The Rubicon Group on three different insurance claims against Citizens.

On November 10, 2014, Ms. Jackie Quintanilla emailed Ms. Romy Valdespino Rodriguez to inform her that the next day she would return the Rubicon contract for representation signed by her, Jogli. Ms. Valdespino Rodriguez and Ms. Quintanilla discussed prior claims and considered the possibility of reopening an old claim.

On November 11, 2014, Ms. Valdespino Rodriguez sent Ms. Quintanilla a Rubicon Group contract to reopen an old claim sent her another Rubicon Group contract to file a new "water heater" claim.

Sometime later, Ms. Quintanilla returned the signed contract and inquired about pending payments for the prior claims. Ms. Quintanilla also questioned Ms. Valdespino Rodriguez as to what date she will be using for the new claim.

On November 12, 2014, Ms. Valdespino Rodriguez contacted Ms. Quintanilla to inform her that the "water heater" claim was opened that day with a date of loss of November 11, 2014.

Page 39 of 68

Affiant's Initials JK

ASA Initials JP

Judge's Initials AL

On November 13, 2014, Ms. Alessandra Kruger contacted Citizens to file a claim on Mr. Quintanilla's behalf for damages that had occurred due to a water heater leak that occurred on that same day. Ms. Valdespino Rodriguez sent Citizens a letter of representation signed by Mr. Quintanilla and dated November 11, 2014.

Within the The Rubicon Group's internal files was a Sworn Proof of Loss that Mr. Quintanilla signed even though the rest of the document was blank.

On November 19, 2014, Ms. Quintanilla advised Ms. Valdespino Rodriguez that they would be hiring another company instead of Mr. Rafael Exposito to, "*do what your company wants to do.*"

On November 26, 2014, Mr. Richard Boullon, a Citizens Field Adjuster, inspected the property in the presence of Ms. Quintanilla. Ms. Quintanilla showed Mr. Boullon the water heater and alleged that it broke and allowed water to leak throughout the house. She stated that Mr. Quintanilla hired a water mitigation company. Ms. Quintanilla could not provide any additional information since she was only there to grant access to the property and preferred that Mr. Quintanilla provide additional details.

On December 3, 2014, Mr. Boullon conducted a recorded interview with Mr. Quintanilla. Mr. Quintanilla stated that On November 11, 2014, approximately 10:00 a.m., he noticed a large amount of water flowing from the hallway towards the bedroom. He then shut off the main water supply line and called his neighbor for assistance. He then called his brother who helped him replace the water heater.

On January 9, 2015, Citizens received an estimate, work order, and assignment of benefits from All Pro Properties Restoration Services in the amount of \$5,012.29.

On February 17, 2015, Ms. Alicia Pardey sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling for \$51,024.67 the damages that occurred at Mr. Quintanilla's residence on November 11, 2014.

On April 13, 2015, The Morgan Law Group filed a law suit against Citizens on Mr. Quintanilla's behalf.

Page 40 of 68

Affiant's Initials   B  

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Judge's Initials   A.G



Citizens Property Insurance Company issued several checks in payment for the claim resulting in an approximate payout of forty-four thousand one hundred and fifty dollars and sixty-two cents (\$44,150.62).

DATE	PAYEE	AMOUNT
12/9/2014	Jogli Quintanilla/HSBC Bank/ The Rubicon Group	\$15,150.62
1/21/2015	Jogli Quintanilla/HSBC Bank/ All Pro Property Restoration/ The Rubicon Group	\$ 4,000.00
6/13/2015	Jogli Quintanilla/The Morgan Law Group	\$ 5,000.00
6/13/2015	Jogli Quintanilla/HSBC Bank/ The Morgan Law Group	\$20,000.00

DATE OF LOSS:

INCIDENT ADDRESS:

HOME OWNER:

CARRIER:

TYPE OF LOSS:

According to internal Rubicon Group documents, [REDACTED] was referred to The Rubicon Group by Mr. Rafael Exposito.

On Wednesday, November 25, 2015, Ms. Romy Valdespino Rodriguez created an internal document titled "Homeowner's Estimating Contract" which contained [REDACTED]'s personal information, as well as his insurance information.

Page 41 of 68

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ASA Initials J.P.

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On Monday, November 30, 2015, Ms. Valdespino Rodriguez scheduled Ms. Diaz de Villegas to respond to the [REDACTED] house for the "First Inspection".

On Monday, December 7, 2015, Ms. Valdespino Rodriguez notified Mr. Ricardo Tello via email to respond to [REDACTED]'s home on December 10, 2014, to create an estimate for damages and provided the following instructions: "All tile, B/B, paint, detach, reset kitch, all bathroom (guest) & master."

On Tuesday, December 8, 2015, Ms. Valdespino Rodriguez emailed Mr. Exposito to respond to the [REDACTED] home, later that day, to conduct a "Loss Assessment Inspection". Ms. Valdespino Rodriguez also conveyed to Mr. Exposito the following set of instructions: "BP-Bathroom Faucet access gurst bathroom, back hallway way & access tile – not just remove tile from hallway."

On Thursday, December 10, 2015, Ms. Valdespino Rodriguez created in The Rubicon Group's electronic files a "contract for representation" which contained [REDACTED] information.

On Thursday, December 10, 2015, Ms. Valdespino Rodriguez contacted Citizens to file a claim on [REDACTED]'s behalf for water damages that had occurred during a bathroom leak that occurred on December 7, 2015.

On Thursday, December 17, 2015, Ms. Elsa Del Valle, Citizens Field Adjuster, met with Ms. Alicia Pardey at Mr. Castineyra's home. Ms. Del Valle concluded that there was no visible water damage and that the damage to the tile was unnecessary. Subsequently, Ms. Del Valle hired an engineer to re-inspect the claim of loss as reported.

On Tuesday, December 22, 2015, Ms. Valdespino Rodriguez sent Citizens a signed Letter of Representation dated December 7, 2015. However, as previously mentioned, the contract itself was not created until December 9, 2016. Ms. Valdespino Rodriguez also sent Citizens a handwritten receipt dated December 7, 2015, in support of the claim for plumbing work performed in [REDACTED]'s bathroom. She also sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$96,945.59, for the damages that occurred in [REDACTED]'s home on December 7, 2015.

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On Wednesday, December 23, 2015, Ms. Del Valle conducted a recorded interview with [REDACTED] in which he stated that he arrived home from work for lunch around 1:30 p.m. and discovered water on the hallway floor. He then contacted his neighbor who referred a plumber. The plumber arrived an hour later. [REDACTED] added that he returned to work and a co-worker referred him to The Rubicon Group.

On Monday, January 11, 2016, Ms. Del Valle conducted a recorded interview with the co-insured, Cynthia Perez Avila. Ms. Avila stated she was informed of the incident by her husband on the day it occurred. When she arrived home from work at approximately 5:00 p.m. she observed a hole in the floor.

On Wednesday, February 3, 2016, Mr. Luis M. Ulloa, P.E., S.I., an engineer with ProNet Group, Inc., conducted an inspection of the property in the presence of Mr. Jose Gonzalez. Mr. Ulloa concluded that there was no damage to support the reported event. Furthermore, that there was no evidence of a repair to the plumbing pipes that serviced the hallway bathroom that would have required the removal of tiles and specifically deemed said damage unnecessary and unjustifiable.

On Tuesday, June 28, 2016, both [REDACTED] and his girlfriend Ms. Avila provided additional statements during an Examination Under Oath. Although Ms. Avila maintained plausible deniability, [REDACTED] contradicted his original recorded statement that he returned to work once the plumber, which he now named as Roberto, arrived. He stated that he did not return to work and instead phoned his boss who in turn, referred the public adjuster.

On Monday, August 8, 2016, The Morgan Law Group filed suit against Citizens on [REDACTED]'s behalf.

Although Citizens denied the claim, on Tuesday, September 6, 2016, the company eventually issued several checks in payment for the fraudulent claims resulting in an approximate payout of twelve thousand dollars (\$12,000).

DATE

PAYEE

AMOUNT

[REDACTED]

[REDACTED]

[REDACTED]

Page 43 of 68

Affiant's Initials [Signature]

ASA Initials [Signature]

Judge's Initials [Signature]

[REDACTED]

**DATE OF LOSS:**

**INCIDENT ADDRESS:**

**HOME OWNER:**

**CARRIER:**

**TYPE OF LOSS:**

In October of 2014, Ms. Romy Valdespino Rodriguez made an entry into the Rubicon Group's Status Sheet indicating that [REDACTED] was instructed to change her policy because her property was only insured for fire damage. Ms. Valdespino Rodriguez advised her to call back once she had changed the coverage.

On November 12, 2014, Ms. Valdespino Rodriguez made the following entry in Rubicon Status Sheet: "the insured called advising that for a new policy they have requested her property to under a roof condition and wind mitigation inspection. Gave her Jerry Suarez contact information so he could go and do one. Once done she will give me a call."

On November 13, 2014, Ms. Valdespino Rodriguez emailed Jerry Suarez regarding the inspection referral of Ms. Saad's home. Mr. Suarez acknowledged the email thanking Ms. Valdespino for the referral.

On November 20, 2014, [REDACTED]'s new insurance policy with Citizens became effective.

On December 15, 2014, Ms. Valdespino Rodriguez dispatched Rafael Exposito to respond [REDACTED] rental property on December 16, 2014, for a Loss Assessment Inspection due to a broken pipe in the kitchen and the bathroom.

On December 16, 2014, Ms. Valdespino Rodriguez made another entry into the [REDACTED] Status Sheet noting that a First Inspection had been conducted and added the following comment: "Insured has Citizens now."

On January 20, 2015, Ms. Alesandra Kruger contacted Citizens to file a claim on [REDACTED] behalf for damages that had occurred due to a bathroom pipe leak that occurred on

Page 44 of 68

Affiant's Initials [Signature]

ASA Initials [Signature]

Judge's Initials [Signature]

January 14, 2015, and a kitchen pipe leak that occurred on January 16, 2015. Ms. Kruger sent Citizens two letters of representation both signed by [REDACTED] and dated January 16, 2015.

On January 27, 2015, Ms. Elisha Goins, a Citizens Field Adjuster, conducted an inspection of the property in the presence of the tenant and Ms. Diaz de Villegas. Ms. Diaz de Villegas informed Ms. Goins that the diverter valve in the hallway bathroom failed and that the supply line under the kitchen slab had failed.

It should be noted that two separate handwritten invoices that detailed plumbing work performed at [REDACTED]'s rental property were located within The Rubicon Group internal files, although they were not submitted to Citizens.

On April 9, 2015, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$13,021.63 for the damages to the bathroom that occurred January 14, 2015, and \$37,042.16 for the damages to the kitchen that occurred at [REDACTED] rental property on January 16, 2015.

Citizens Property Insurance Company issued several checks in payment for the fraudulent claims resulting in an approximate payout of thirty thousand three hundred thirty one dollars and forty-seven cents (\$30,331.47).

DATE	PAYEE	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

DATE OF LOSS: [REDACTED]

INCIDENT ADDRESS: [REDACTED]

HOME OWNER: [REDACTED]

CARRIER: [REDACTED]

TYPE OF LOSS: [REDACTED]

On November 11, 2014, [REDACTED]'s policy with Universal became effective.

Page 45 of 68

Affiant's Initials [REDACTED]

ASA Initials [REDACTED]

Judge's Initials [REDACTED]

On December 11, 2014, Ms. Valdespino Rodriguez updated the Status Sheet to reflect that she had received the policy from Ricardo Alvarez, DeZayas Insurance Agency.

On December 18, 2014, Ms. Valdespino Rodriguez emailed Rafael Exposito to respond to ██████████'s home on December 29, 2014, at 9:30 a.m. for a Loss Assessment Inspection due to a broken pipe in the kitchen.

On January 23, 2015, Ms. Valdespino Rodriguez made another entry into the Status Sheet for ██████████'s claim that indicated the Loss Assessment Appointment had been changed and that an appointment for an estimate was added.

On January 26, 2015, Ms. Valdespino Rodriguez sent ██████████ a contract for representation to sign and return. Multiple emails were exchanged between ██████████ and Ms. Valdespino Rodriguez due to their names being misspelled.

On January 28, 2015, Ms. Valdespino Rodriguez updated the Status Sheet to reflect that a corrected version of The Rubicon Group's contract was sent to ██████████ and that once the signed contract was received, the claim would be opened. Below that entry, Ms. Valdespino Rodriguez then noted, "Received signed contract. Claim was opened." On the same day, Alessandra Kruger contacted United to file a claim on behalf of ██████████ for damages that occurred on January 27, 2015, from a kitchen pipe leak.

On January 29, 2015, Ms. Kruger sent United a Letter of Representation signed by both ██████████ and dated January 27, 2015.

On February 5, 2015, Damon Arnette, an independent adjuster of United, responded to the property and conducted an inspection in the presence of ██████████ and Ms. Diaz de Villegas. Mr. Arnette observed that there was a trench in the kitchen floor that was made by the plumber that made repairs. Mr. Arnette was informed by the insured that the plumber was named "Ralph Moreno." Mr. Arnette noted that there was no evidence of ensuing damages.

On March 26, 2015, Alicia Pardey sent United several documents including a repair estimate in the amount of \$33,592.70, a Sworn Proof of Loss signed by ██████████ and dated March 18, 2015, water bills, and an invoice for plumbing work performed at ██████████.

Page 46 of 68

Affiant's Initials BP

ASA Initials J-P

Judge's Initials AM

[REDACTED] home that was dated January 27, 2015, but lacked any information that would identify a plumber or a plumbing company.

UPCIC issued a check in payment for the claim resulting in an approximate payout of fourteen thousand five hundred dollars (\$14,500.00).

DATE	PAYEE	AMOUNT
6/12/2015	[REDACTED] The Rubicon Group	[REDACTED]

DATE OF LOSS:	February 19, 2015
INCIDENT ADDRESS:	14501 SW 10 ST, Miami, FL
HOME OWNER:	Antonio Angelbello
CARRIER:	Citizens (Claim #001-00-033969)
TYPE OF LOSS:	Residential

Mr. Antonio Angelbello was referred to The Rubicon Group by Ms. Teresa Hernandez according to Rubicon internal documents.

On Friday, February 13, 2015, Ms. Romy Valdespino Rodriguez sent Mr. Angelbello a text message requesting a copy of his insurance policy.

On Tuesday, February 17, 2015, Ms. Valdespino Rodriguez scheduled Ms. Diaz de Villegas to meet Mr. Angelbello at his residence for "First Inspection" on that same date at 5:30 p.m. This was entered into the Rubicon calendar.

On February 18, 2015, Mr. Angelbello was sent a text message with the Rubicon office address from one of the Rubicon cell phones.

On Thursday, February 19, 2015, Ms. Valdespino Rodriguez contacted Citizens to file a claim on Mr. Angelbello's behalf for damages that had occurred due to a bathroom pipe leak that same day. Ms. Valdespino Rodriguez sent Citizens a contract for representation signed by Mr. Angelbello and dated February 19, 2015.

On February 20, 2015, Ms. Valdespino and Ms. Diaz De Villegas exchange the following text messages:

Affiant's Initials [Signature]

ASA Initials [Signature]

Judge's Initials [Signature]

Valdespino to Diaz De Villegas – Antonio says why does Rigo has to go if no water problem visible. To please touch bases with you. Antonio Angelbello – claim I reported yesterday.

Diaz De Villegas to Valdespino - Ok. Tell him I will call him.

Valdespino to Diaz de Villegas - Okay his number is 786-395-8047.

On Monday, February 23, 2015, Ms. Valdespino Rodriguez emailed Mr. Rafael Exposito to respond to Mr. Angelbello's residence on February 25, 2015, 9:30 a.m., for a "Loss Assessment Inspection," due to a broken pipe in the bathroom and notified Mr. Exposito that Mr. Jose Gonzalez and Mr. Rigoberto Lopez would attend the same day.

On Thursday, February 26, 2015, Citizens' Adjuster, Mr. Emory Bullard, completed an inspection of the property in the presence of Mr. Angelbello and Ms. Valdespino Rodriguez. Mr. Bullard noted that there was damage to the flooring and baseboards and that the plumbing leak had been accessed via the bathroom tile wall.

On Monday, March 2, 2015, Mr. Bullard conducted a recorded interview with Mr. Angelbello via telephone. Mr. Angelbello stated that on February 19, 2016, he noticed water on the floor of the family room adjacent to the master bathroom. A friend recommended a plumber that responded the same day. The plumber opened the shower wall and made repairs. The plumber recommended a water mitigation company, who also responded the same day and set up drying equipment. A friend of his recommended The Rubicon Group.

On Tuesday, March 3, 2015, Ms. Alicia Pardey sent Citizens a copy of the assignment of benefits from Emergency Response and Repair and water mitigation logs dated February 19<sup>th</sup> through 23<sup>rd</sup>, 2015. It should be noted that Mr. Lopez was not notified to respond to Mr. Angelbello's residence until February 25, 2015.

On Monday, March 9, 2015, The Rubicon Group sent Citizens an invoice dated February 19, 2015, for plumbing work performed at Mr. Angelbello's residence on the date of loss, lacking any information that would identify a company, handyman, or a plumber.

On Friday, March 20, 2015, the house was sold.

On Sunday, April 19, 2015, Ms. Pardey sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$35,533.50 for the damages that occurred at Mr. Angelbello's residence on February 19, 2015.

Page 48 of 68

Affiant's Initials AB

ASA Initials SA

Judge's Initials SA



On Wednesday, April 22, 2015, Mr. Kevin Thompson, a Citizens' Claim Adjuster, contacted The Rubicon Group and requested receipts for repairs made at Mr. Angelbello's residence after the date of loss but prior to the sale of the home.

On Monday, August 31, 2015, Ms. Valdespino Rodriguez sent Citizens two hand written receipts (like those recovered from her desk) detailing repairs made in the amount of \$25,250.00.

On Wednesday, September 2, 2015, Ms. Valdespino Rodriguez sent Mr. Thompson an email that included an additional handwritten receipt for materials used in order to make the above mentioned repairs. The receipt lacked information regarding any information that would identify where the materials were purchased and can also be matched to a receipt book found at the office of The Rubicon Group.

Citizens Property Insurance Company issued several checks in payment for the claims resulting in an approximate payout of thirty-thousand three hundred seventy-three dollars and twenty cents (\$30,373.20).

<b>DATE</b>	<b>PAYEE</b>	<b>AMOUNT</b>
4/3/2015	Antonio Angelbello/The Rubicon Group/ Regions Bank	\$20,169.32
4/5/2015	Antonio Angelbello/The Rubicon Group/ Emergency Response & Repair	\$ 3,909.28
9/2/2015	Antonio Angelbello/The Rubicon Group	\$ 2,760.68
9/3/2015	Antonio Angelbello/The Rubicon Group/	\$ 3,533.92

**DATE OF LOSS:** April 10, 2015  
**INCIDENT ADDRESS:** 19664 NW 59 Circle Place Hialeah, FL  
**HOME OWNER:** Alexis Morfa  
**CARRIER:** Citizens (Claim #001-00-037777)  
**TYPE OF LOSS:** Residential

According to internal Rubicon Group documents, Mr. Alexis Morfa was referred to The Rubicon Group by Mr. Alberto Guapera, an individual that was represented by The Rubicon Group on multiple claims against Citizens and Tower Hill.

On Wednesday, December 10, 2014, Mr. Morfa requested a copy of his insurance policy declarations page from Gold State Insurance via email.

Affiant's Initials AB  
ASA Initials J.P.  
Judge's Initials A.H.

On Wednesday, January 7, 2015, Mr. Morfa forwarded the email to Ms. Romy Valdespino Rodriguez. Ms. Valdespino Rodriguez replied, "Received, Thanks!"

On Thursday, January 8, 2015, Ms. Valdespino Rodriguez made the first entry onto the Status Sheet for Mr. Morfa's claim in which she explained that, "Barbie reviewed file, there is a kitchen claim we can open. Insured wants to put wood floor so we advised him once that's done we can go ahead and open the claim."

On Tuesday, January 20, 2015, Ms. Valdespino Rodriguez made another entry onto the Status Sheet in which she detailed a conversation with Mr. Morfa during which Mr. Morfa called to inquire, "if he would pay out of pocket the wood floor if it would be reimbursed once the claim was opened, Ms. Diaz de Villegas was consulted and she said yes, made appointment for Walter Zumeran to go to insured's property and do an estimate tomorrow at 5:30 p.m." Ms. Valdespino Rodriguez consulted Ms. Diaz de Villegas via email.

On Saturday, March 28, 2015, Ms. Valdespino Rodriguez scheduled an appointment Ms. Diaz de Villegas to meet Mr. Morfa at his residence for a "First Inspection".

On Wednesday, April 1, 2015, Ms. Valdespino Rodriguez made an entry into Mr. Morfa's claim Status Sheet to indicate that, "Per Barbie, contract was left at 15%, I emailed it to him and advised him to send original by mail. He also told me Walter will start the floor tomorrow, will be done by next week."

On Wednesday, April 7, 2015, Ms. Valdespino Rodriguez made an entry into the same Status Sheet in which she indicated that the insured had called her and stated that, "...Walter will be done Thursday, LAI will be for Friday so it can get opened." Ms. Valdespino Rodriguez then dispatched Rafael Exposito to respond to Mr. Morfa's residence on April 10, 2015, at 9:30 a.m. due to a broken pipe in the kitchen and included the instructions, "BPK (2 supply lines under the sink)."

On Friday, April 10, 2015, Ms. Valdespino Rodriguez made an entry into the public calendar indicating that Jose Gonzalez had been instructed to create an estimate of the repairs related to Morfa's claim. Ms. Valdespino Rodriguez contacted Citizens to file a claim on Mr. Morfa's behalf for damages that had occurred due to a kitchen pipe leak that same day. Ms.

Affiant's Initials RP

ASA Initials J.P.

Judge's Initials AM

Valdespino Rodriguez sent Citizens a contract for representation signed by Mr. Morfa and dated April 10, 2015.

On Tuesday, April 14, 2015, Mr. Trevor Fong, a Citizens' Field Adjuster, inspected the property in the presence of Ms. Diaz de Villegas and Mr. Morfa's grandmother. Ms. Diaz de Villegas informed Mr. Fong that Mr. Morfa had discovered water within the kitchen cabinet and on the kitchen floor. Ms. Diaz de Villegas provided him with an estimate for repairs in the amount of \$50,773.69.


On Thursday, April 16, 2015, Ms. Alicia Pardey sent Citizens two handwritten invoices that detailed plumbing work performed at Mr. Morfa's home by a plumber named Janiel Orié. It should be noted that the name Janiel Orié and Johnny Orié has been used in claims filed for Maria Gaffaro, Alex Diaz de Villegas, Jose & Ida Arroyo, Efreén Suarez, and many others who have all been represented by Rubicon.

On Monday, April 20, 2015, Mr. Fong conducted a recorded interview with Mr. Morfa during which he stated that there had been a water supply line leak in the kitchen that caused damage to the kitchen cabinets and laminate wood flooring. He discovered the problem when he arrived home from work on April 10, 2015. He then found information for a plumber on line. The plumber responded the same day and replaced the water supply lines.


On Wednesday, June 3, 2015, Ms. Pardey sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$50,773.69 for the damages that occurred at Mr. Morfa's residence on April 10, 2015.

Citizens Property Insurance Company issued several checks in payment for the claims resulting in an approximate payout of thirty-eight thousand seven hundred thirty-one dollars and twenty-three cents (\$38,731.23).

DATE	PAYEE	AMOUNT
5/6/2015	Alexis Morfa/Natalie Morfa/PennyMac Loan Services/The Rubicon Group	\$31,231.23
7/23/2015	Alexis Morfa/Natalie Morfa/PennyMac Loan Services/The Rubicon Group	\$ 7,500.00
<b>DATE OF LOSS:</b>	<b>May 2, 2015 &amp; May 6, 2015</b>	

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ASA Initials 

Judge's Initials 

**INCIDENT ADDRESS:** 9120 SW 148 CT Miami, FL  
**HOME OWNER:** Jessica Mojica  
**CARRIER:** Citizens (Claim# 001-00-039917&001-00-039918)  
**TYPE OF LOSS:** Residential

According to the internal Rubicon Group file, Ms. Jessica Mojica was referred to The Rubicon Group by Mr. Ariel Pedrosa.

On Thursday, January 29, 2015, Ms. Romy Valdespino Rodriguez emailed Ms. Mojica letting her know that Ms. Diaz de Villegas would meet her at her home later that afternoon for the "First Inspection".

On Friday, January 30, 2015, Ms. Diaz de Villegas emailed Ms. Valdespino Rodriguez to provide Ms. Mojica the contact information for Mr. Ricardo Alvarez from DeZayas Insurance Agency. Records revealed that Ms. Mojica's current insurance policy with Universal Property & Casualty Insurance did not provide the appropriate coverage.

Ms. Mojica's was eventually sold a new policy with Citizens (00534018) which became effective on Monday, March 16, 2015.

On Monday, March 23, 2015, Mr. Alvarez from DeZayas Insurance Agency sent Citizens a copy of Ms. Mojica's previous policy with Universal Property & Casualty Insurance in order to obtain immediate coverage and avoid the thirty-day waiting period.

Homeowner's Estimating & Appraisal Corp Contract with insured's info on it was created on February 17, 2015 according to the metadata obtained from the Rubicon Group's computer.

On Wednesday, May 6, 2015, Ms. Valdespino Rodriguez contacted Ms. Mojica and stated they will contact her for a possible date for plumber to go to her property.

On Thursday, May 7, 2015, Ms. Valdespino Rodriguez contacted Citizens to file a claim on behalf of Ms. Mojica for water damages that had occurred in the bathroom area of her residence on May 2, 2015. Ms. Valdespino Rodriguez also reported that on May 6, 2015, Ms. Mojica had a broken pipe in her kitchen. Ms. Valdespino Rodriguez sent Citizens two signed

Page 52 of 68

Affiant's Initials SP

ASA Initials SP

Judge's Initials AM

Letters of Representation both dated May 6, 2015 and a hand-written plumbing receipt in support of the kitchen claim.

On Thursday, June 4, 2015, Ms. Mojica provided a recorded statement to Citizen's Field Adjuster, Mr. Ricardo Tello, in which Ms. Mojica stated that on May 2, 2015 she found a leak in the upstairs bathroom coming down to the stairway. She then dried up the water and called a plumber. The plumber came the same day and made repairs. Ms. Mojica further explained that on May 6, 2015, she arrived home from work and noticed water coming from under the kitchen cabinet seeping into the dining room. Ms. Mojica again dried the water herself and called a plumber. It should be noted that while employed by Citizen's as a Field Adjuster, Mr. Ricardo Tello, was contemporaneously hired by Ms. Diaz de Villegas to provide damage estimates for The Rubicon Group in order to dispute Citizens assessment of the loss. A flagrant conflict of interest since the Field Adjuster has the authority to approve the counter offer presented by the Public Adjuster.

On Thursday, July 16, 2015, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an attachment for an estimate attached totaling \$34,411.82 for the damages that occurred on May 6, 2015.

On Friday, July 17, 2015, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an attachment for an estimate attached totaling \$29,054.67 for the damages that occurred on May 2, 2015.

Citizens Property Insurance Company issued several checks in payment for the fraudulent claims resulting in an approximate payout of twenty thousand nine hundred and five dollars and three cents (\$20,905.03) and thirteen thousand, seven hundred sixteen dollars and eight cents (\$13,716.08).

<b>DATE</b>	<b>PAYEE</b>	<b>AMOUNT</b>
8/6/2015	Jessica Mojica/The Rubicon Group	\$ 405.03
10/1/2015	Jessica Mojica/Michael Roman/PennyMac Loan Services LLC ISAOA/The Rubicon Group	\$15,000.00
10/1/2015	Jessica Mojica/Michael Roman/Ligman Martin PL/ The Rubicon Group	\$ 5,500.00

Page 53 of 68

Affiant's Initials JM

ASA Initials JP

Judge's Initials JL

DATE	PAYEE	AMOUNT
6/9/2015	Jessica Mojica/ PennyMac Loan Services LLC ISAOA/The Rubicon Group	\$ 8,971.71
9/24/2015	Jessica Mojica/Michael Roman/PennyMac Loan Services LLC ISAOA/The Rubicon Group	\$ 4,744.37

**DATE OF LOSS:** [REDACTED]  
**INCIDENT ADDRESS:** [REDACTED]  
**HOME OWNER:** [REDACTED]  
**CARRIER:** [REDACTED]  
**TYPE OF LOSS:** [REDACTED]

On Thursday, April 2, 2015, Ms. Romy Valdespino Rodriguez emailed Mr. Rafael Exposito to respond to [REDACTED]'s residence on Monday, April 6, 2015 at 1:00 p.m. with the following instructions: *"Barbie wants you to check it out, drain pipe guest bathroom smells bad. Call her from the property."*

On Friday, April 3, 2015, Ms. Valdespino Rodriguez exchanged text messages with [REDACTED] in which a plumber's appointment was set and confirmed to occur on April 6, 2015 at 1:00 p.m.

On Thursday, May 7, 2015, Ms. Valdespino Rodriguez sent additional text messages to [REDACTED] inquiring whether the plumber could be at her property on May 8, 2015. [REDACTED] replied yes. Ms. Valdespino Rodriguez then sent Mr. Exposito an email directing him to respond to the [REDACTED] home on Friday May 8, 2015 at 9:30 a.m. with the following:

*"Drain pipe damaged in bathroom backflow damaging tile & baseboard"*

On Friday, May 8, 2015, Ms. Valdespino Rodriguez again sent [REDACTED] a text message to inquire if the mitigation company could respond to her home on Monday, May 11, 2015, at 10:00 a.m. [REDACTED] again replied yes.

Affiant's Initials [Signature]  
 ASA Initials: J.P.  
 Judge's Initials [Signature]

On Monday, May 11, 2015, Ms. Valdespino Rodriguez set an appointment for Mr. Rigoberto Lopez to respond to the Lorie's residence at 10:00 a.m.

On Tuesday, May 12, 2015, Ms. Valdespino Rodriguez contacted Citizens to file a claim on [REDACTED]'s behalf for water damages that had occurred during a bathroom pipe leak that occurred on May 11, 2015. Ms. Valdespino sent Citizens a signed Letter of Representation dated May 11, 2015.

On Wednesday, May 27, 2015, Mr. Luis Morejon, Citizens' Field Adjuster, met Ms. Diaz de Villegas at the [REDACTED] home to conduct an inspection of the premises. Mr. Morejon noted that the plumbing repairs had been completed and that the invoice would be provided by The Rubicon Group. Ms. Diaz de Villegas explained that the toilet at the end of the hallway overflowed. Ms. Diaz de Villegas stated that [REDACTED] called a plumber, Rafael, who responded to make repairs. Ms. Diaz de Villegas did not know the name of the water mitigation company that had responded but that she would forward the information when she had it.

On Friday, May 29, 2015, Ms. Alicia Pardey sent Citizens a computer-generated receipt in support of plumbing work performed at the Lorie's residence dated May 11, 2015, which lacked any information that could identify a plumber or company of any type.

On Wednesday, June 3, 2015, Mr. Morejon, conducted a recorded interview with [REDACTED] in which she stated that on the date of loss she noticed water coming from the closet area of her son's room as well as the toilet area. She added that the kitchen cabinets as well as the flooring had been replaced after her last claim but that she did not have any tiles left over.

On Thursday, August 6, 2015, The Rubicon Group sent Citizens a letter titled "Appraisal Demand and Estimate" with an estimate attached totaling \$51,420.08 for the damages that occurred in [REDACTED]'s home on May 11, 2015.

Citizens Property Insurance Company issued several checks in payment for the fraudulent claims resulting in an approximate payout of twenty-eight thousand three hundred and seventy-four dollars and thirty-five cents (\$28,374.35).

DATE	PAYEE	AMOUNT
[REDACTED]	[REDACTED]	[REDACTED]

Page 55 of 68

Affiant's Initials [Signature]

ASA Initials [Signature]

Judge's Initials [Signature]

The Rubicon Group

5/16/2015

8/7/2015

The Rubicon Group

10/20/2015

The Rubicon Group

**DATE OF LOSS:** May 16, 2015 & May 20, 2015  
**INCIDENT ADDRESS:** 13460 SW 262 ST Homestead, FL  
**HOME OWNER:** Center Line Services Group (Luz Giraldo)  
**CARRIER:** Citizens(Claim#001-00-041054 & 001-00-041055)  
**TYPE OF LOSS:** Residential

At the time the claim was filed, Ms. Luz Giraldo was the registered agent and President of the corporation Center Line Services Group. Mr. Syffer Quiceno was the vice-president. According to the Rubicon Group files, they were referred by Mr. Mauricio Paris.

On Thursday, April 15, 2015, Ms. Romy Valdespino Rodriguez emailed Mr. Richard Tello and advised him that upon Ms. Diaz De Villegas returning from a trip, he needed to schedule a client for an estimate at his home located at 13460 SW 262 St., Homestead, FL. Although Ms. Valdespino Rodriguez spelled the clients name as Safer Iqueno it was later determined that she was referring to Syffer Quiceno.

It should be noted that the client's new acquired homeowner's policy became effective on May 13, 2015.

On Thursday, May 14, 2015, Ms. Valdespino Rodriguez set an appointment in the Rubicon calendar for Ms. Diaz de Villegas to meet Mr. Quiceno at the property for a "First Inspection".

On Friday, May 22, 2015, Ms. Valdespino Rodriguez contacted Citizens to file a claim on Center Line Services Group's behalf for water damages that had occurred during an A/C leak on May 16, 2015, and during a kitchen pipe leak that occurred on May 20, 2015. Ms. Valdespino Rodriguez faxed the contracts for representation both signed by Ms. Giraldo and

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ASA Initials   *J.P.*  

Judge's Initials   *JP*



dated May 20, 2015. Since the loss reportedly occurred within the first 30 days of the policy's inception, the claim was referred to the Special Investigations Unit.

On Tuesday, June 9, 2015, Ms. Melanie Crobaugh, Citizens' Field Adjuster, inspected the property with Ms. Diaz de Villegas and the property manager (unknown). Ms. Crobaugh noted that there was no mildew/mold/fungus and no damage to any contents.

Ms. Crobaugh obtained photographs from the realtor that had listed the property in question. The photographs depicted holes in the kitchen cabinets that match the mitigation holes allegedly made due to the loss. Ms. Crobaugh noted that there was no firm evidence any plumbing repairs had been made in the pipes, that the flooring was broken with no justification, that the mitigation company made holes in the walls also without justification. The discoloration she observed was indicative of long-term damage.

On Friday, June 12, 2015, Ms. Crobaugh conducted a recorded interview with Ms. Giraldo and Ms. Alicia Pardey was present. Ms. Giraldo stated that there were no issues with the property prior to its date of purchase, which was April 22, 2015. She went on to explain that she discovered the water damages when she went to show the property to a possible renter. At that time she observed water leaking from the first floor ceiling. She went upstairs and saw that there was water all over the second story floor tile. Ms. Giraldo stated that she reported the issue to her brother and he came and repaired the problem. Ms. Giraldo stated that her brother called a water mitigation company.

On Monday, June 15, 2015, Ms. Valdespino Rodriguez emailed Mr. Quiceno to change the dates on the water mitigation contract and logs to match the reported dates of loss.

On June 25, 2015, Mr. Dana Race, Principal Engineer Civil/Structural, SDII Global Corporation, Forensic Engineering, inspected the property in the presence of Mr. Jose Gonzalez. Mr. Race concluded that there was no evidence of a leak in the supply line of the kitchen sink. Further, that there was no evidence of moisture exposure to the main living area or kitchen that would have warranted the apparent mitigation efforts performed.

On July 13, 2015, Blue Star Restoration sent Citizens and invoice for water mitigation services performed at Ms. Giraldo's property in the amount of \$4,533.49, photographs, water mitigation logs, and an "assignment of benefits" document.

Page 57 of 68

Affiant's Initials   *JP*  

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On October 26, 2015, Citizen's Investigator, Ms. Jeneice Robinson, concluded that her investigation into the claim had uncovered false claims and misrepresentations of the facts. Robinson added that according to the engineer's report and documentation submitted by the water mitigation company it was evident that the A/C equipment was missing from the property. In fact, the two major components of the A/C unit, the air handler and the compressor had been reported stolen sometime in November 2014, prior to the alleged leak. As such, there was no A/C installed at the time the A/C leak was reported.

Investigator Robinson also exposed that Blue Star Restoration submitted photographs displaying their equipment connected to the electrical outlets, even though the property was not energized. According to Florida Power and Light, the electrical meter had been removed by the power company.

The Rubicon Group requested \$14,756.22 from Citizen for claim number 001-00-041054 and \$27,211.23 for claim number 001-00-014055.


On November 24, 2015, Citizens denied both claims.

<b>DATE OF LOSS:</b>	<b>May 20, 2015 &amp; May 25, 2015</b>
<b>INCIDENT ADDRESS:</b>	<b>5600 W 12<sup>th</sup> Court, Hialeah, FL 33012</b>
<b>HOME OWNER:</b>	<b>Vivian Hernandez</b>
<b>CARRIER:</b>	<b>Tower Hill (Claim# 2800153704 &amp; 2800153702)</b>
<b>TYPE OF LOSS:</b>	<b>Residential – Water</b>


According to the Rubicon Group's internal files, Vivian Hernandez was referred by Ms. Diaz de Villegas's father, Jose Gonzalez.

On May 4, 2015, Romy Valdespino Rodriguez created a calendar entry for Mr. Gonzalez to respond to Ms. Hernandez's home on May 5, 2015 for a First Inspection. Ms. Valdespino Rodriguez noted that "Her grandma would open the door" and that there were "two possible claims: BPK & BPB."

Page 58 of 68

Affiant's Initials 

ASA Initials J.P.

Judge's Initials 

On May 6, 2015, Ms. Valdespino Rodriguez rescheduled the appointment for Ms. Diaz de Villegas to respond to Ms. Hernandez's home on May 7, 2015, for First Inspection. Ms. Valdespino Rodriguez also sent Ms. Diaz de Villegas an email that included prefilled contracts with the property address, insurance carrier, and policy number to take with her to Ms. Hernandez. On May 12, 2015, the inspection is rescheduled once more for May 13, 2015.

On May 18, 2015, Ms. Valdespino Rodriguez emailed Ms. Hernandez contracts for her to sign. Multiple text messages are exchanged between Ms. Valdespino Rodriguez and Ms. Hernandez regarding the plumber's appointment for May 22, 2015 and the importance of her signing the contracts before the plumber responds to her house.


On May 21, 2015, Ms. Valdespino Rodriguez notified Ms. Hernandez via text message that the plumber's appointment scheduled for May 22, 2015 was cancelled because she had not yet signed the contracts. Ms. Valdespino then set the plumbing work appointment for May 26, 2015.

On May 21, 2015, Ms. Valdespino Rodriguez then emailed Rafael Exposito to respond to Ms. Hernandez's home on May 26, 2015 for a Loss Assessment Inspection, and instructed him to, "Call Barbie once you're there because everything might be able to get claimed in one claim instead of two."

On May 22, 2015, during another exchange of text messages, Ms. Valdespino Rodriguez reminded Ms. Hernandez that the plumber would be at her house on May 26, 2015, at 9:30 a.m. Ms. Valdespino Rodriguez also called to her attention the fact that although she had signed the contracts that were sent to her, she neglected to sign the "Appraisal Estimating Contract."

On May 26, 2015, Ms. Valdespino Rodriguez contacted Tower Hill to file a claim on Ms. Hernandez's behalf for water damages that occurred after a pipe leak in the bathroom on May 20, 2015, and a pipe leak in the kitchen at her residence on May 25, 2015. Ms. Valdespino Rodriguez sent Tower Hill two Letters of Representation both signed by Ms. Hernandez and dated May 26, 2015.

On June 2, 2015, Travis Smith, Tower Hill Field Adjuster, met with Ms. Diaz de Villegas and Ms. Hernandez's housekeeper and conducted an inspection of the property. Upon

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examining the repairs, Mr. Smith noted that the plumbing repairs that were made were not cost effective.

On June 10, 2015, Leslie Pottinger, Tower Hill desk adjuster, engaged an engineer based upon review of Mr. Smith's report.

On June 19, 2015, Ms. Valdespino Rodriguez sent Mr. Exposito an email to respond to Ms. Hernandez's home with instructions to, "fill the hole."

On June 25, 2015, Nazario Ramirez, engineer with ProNet met with Ms. Hernandez and Mr. Gonzalez for a re-inspection of the property. Mr. Ramirez noted that the source of the water damage was a result of a long-term water leak and not as a result of a sudden event. Both of the openings in the adjoining walls between the bathrooms were made during a failed attempt to locate the source of a water leak. The resulting damage to the kitchen cabinet counter top was caused by a shortterm water exposure from daily kitchen activity. The damage at the bottom of the cabinet was the result of blunt force impact and not as a result of any water event. Further, that no there was no damage to support any water event originating from the cavity opened in the kitchen slab.

On June 30, 2015, Ms. Valdespino Rodriguez emailed two Sworn Proof of Loss forms detailing estimates for damages totaling \$44,169.79 for the kitchen claim and \$17,704.59 for the bathroom claim.

On July 31, 2015, Tower Hill denied the bathroom claim based on the engineer's report.

On August 3, 2015, Alicia Pardey sent Ms. Valdespino Rodriguez an email that included an invoice describing plumbing work performed in Mr. Hernandez's kitchen with the comment, "Barbie reviewed the following invoices and they are ready to go."

On the same day, Ms. Valdespino Rodriguez sent Tower Hill the invoice dated May 25, 2015, in support of the plumbing work performed in Ms. Hernandez's kitchen.

On August 4, 2015, both claims are assigned to Mark Turloff, Tower Hill Special Investigations Unit. Mr. Turloff contracted Isabel Caride, Lemiux and Associates to conduct a recorded interview with Ms. Hernandez.

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ASA Initials   *SP*  

Judge's Initials   *AS*

On September 23, 2015, Ms. Caride met with Ms. Hernandez and Alicia Pardey at Ms. Hernandez's home to conduct the recorded interview. Ms. Hernandez stated that on May 25, 2015, she returned from work at approximately 5:00 p.m. and discovered a puddle of water in the kitchen. A friend, Maria Elmira, referred her to a plumber and a public adjuster. Ms. Hernandez identified the plumber as "Rafael." Ms. Hernandez went on to explain that Rafael arrived the same day and opened the floor to repair a supply line. She then contacted The Rubicon Group. Ms. Hernandez stated that the plumber closed the hole he made in the floor on the same day. Ms. Pardey then corrected her and Ms. Hernandez then said that he returned another day to close the hole. Ms. Caride showed her a copy of the invoice submitted to Tower Hill in support of the plumbing work and she acknowledged that it was the receipt that Rafael provided to her on that day. It should be noted that the invoice submitted is consistent with invoices submitted by the Rubicon Group on other claims.

Ms. Caride then inquired regarding the phone number written on the invoice because it was a disconnected line but Ms. Hernandez could not provide any other numbers and Ms. Pardey remained silent.

It should be noted that by the time the statement was taken, the bathroom claim had been denied and Morgan Law Group had filed suit against Tower Hill for damages. Although she refused to answer questions regarding the bathroom claim, Ms. Hernandez stated that the loss pre-dated the kitchen water event and that she never called a plumber for the bathroom claim.

On October 16, 2015, Tower Hill requested an Examination Under Oath be conducted with Ms. Hernandez.

On October 31, 2015, Tower Hill was notified in writing that Ms. Hernandez withdrew both claims.

Affiant's Initials   *SC*    
ASA Initials   *AS*    
Judge's Initials   *D*

Based on the above facts, your Affiant believes that probable cause exists to arrest:

- 1) **Barbara Maria Diaz de Villegas**
  - F.S.S. 895.03 & 910.01, Racketeering ONE (1) COUNT
  - F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT
  - F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree TWENTY-FIVE (25) COUNTS
  - F.S.S. 817.234(1) & 817.234(11)(a),  
False and Fraudulent Insurance Claims 3rd Degree ONE (1) COUNT
  - F.S.S. 812.014(2)(b), Grand Theft 2nd Degree TWENTY-FIVE (25) COUNTS
  - F.S.S. 812.014(2)(c), Grand Theft 3rd Degree ONE (1) COUNT
  
- 2) **Rafael Exposito**
  - F.S.S. 895.03 & 910.01, Racketeering ONE (1) COUNT
  - F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT
  - F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree SEVENTEEN (17) COUNTS
  - F.S.S. 812.014(2)(b), Grand Theft 2nd Degree SEVENTEEN (17) COUNTS
  
- 3) **Rigoberto Lopez**
  - F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT
  - F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT
  - F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
  
- 4) **Ricardo Alvarez**
  - F.S.S. 895.03 & 910.01, Racketeering ONE (1) COUNT
  - F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT
  - F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree FIVE (5) COUNTS
  - F.S.S. 812.014(2)(b), Grand Theft 2nd Degree FIVE (5) COUNTS
  
- 5) **Jose Gonzalez**
  - F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT
  - F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT
  - F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

Affiant's Initials                     

ASA Initials                     

Judge's Initials

- 6) Romy Valdespino Rodriguez**  
 F.S.S. 895.03 & 910.01, Racketeering ONE (1) COUNT  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree SEVENTEEN (17) COUNTS  
 F.S.S. 817.234(1) & 817.234(11)(a),  
 False and Fraudulent Insurance Claims 3rd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree SEVENTEEN (17) COUNTS  
 F.S.S. 812.014(2)(c), Grand Theft 3rd Degree ONE (1) COUNT
- 7) Alessandra Kruger**  
 F.S.S. 895.03 & 910.01, Racketeering ONE (1) COUNT  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree FOURTEEN (14) COUNTS  
 F.S.S. 817.234(1) & 817.234(11)(a),  
 False and Fraudulent Insurance Claims 3rd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree FOURTEEN (14) COUNTS  
 F.S.S. 812.014(2)(c), Grand Theft 3rd Degree ONE (1) COUNT
- 8) Alicia Pardey**  
 F.S.S. 895.03 & 910.01, Racketeering ONE (1) COUNT  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree SEVEN (7) COUNTS  
 F.S.S. 817.234(1) & 817.234(11)(a),  
 False and Fraudulent Insurance Claims 3rd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree SEVEN (7) COUNTS  
 F.S.S. 812.014(2)(c), Grand Theft 3rd Degree ONE (1) COUNT
- 9) Ricardo Tello**  
 F.S.S. 895.03 & 910.01, Racketeering ONE (1) COUNT  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree TWO (2) COUNTS  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree TWO (2) COUNTS

Affiant's Initials RP

ASA Initials J.P.

Judge's Initials AD

**10) Yuri Tejada**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**11)** [REDACTED]

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**12)** [REDACTED]

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**13) Misael Farinas**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**14)** [REDACTED]

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**15) Yoanet Cobiella**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

Affiant's Initials [Signature]

ASA Initials [Signature]

Judge's Initials [Signature]



**16) Alain Marichal**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**17) Eloina Ramos**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**18) Manuel Sanchez**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**19) Esteban Diaz**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**20) Emilia Palacio DAHLBERG**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

**21) Fanny Rosales**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

Affiant's Initials B

ASA Initials J.P.

Judge's Initials [Signature]

- 22) **Alfredo Quinonez**  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
- 23) **Maria Gaffaro**  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
- 24) **[REDACTED]**  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
- 25) **Ibrahim Velazquez**  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(a),  
 False and Fraudulent Insurance Claims 3rd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(c), Grand Theft 3rd Degree ONE (1) COUNT
- 26) **Jacqueline Quintanilla**  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
- 27) **[REDACTED]**  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

Affiant's Initials [Signature]  
 ASA Initials J.P.  
 Judge's Initials [Signature]

- 28) ██████████  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
- 29) ██████████  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
- 30) **Antonio Angelbello**  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
- 31) **Alexis Morfa**  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
- 32) **Jessica Mojica**  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT
- 33) ██████████  
 F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
 F.S.S. 817.234(1) & 817.234(11)(b),  
 False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
 F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

Affiant's Initials   *AS*  

ASA Initials   *J.P.*  

Judge's Initials   *J*

**34) Luz Giraldo**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT

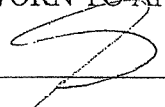
**35) Vivian Hernandez**

F.S.S. 895.03(4) & 777.04(3), Racketeering Conspiracy ONE (1) COUNT  
F.S.S. 817.234(1) & 817.234(11)(b),  
False and Fraudulent Insurance Claims 2nd Degree ONE (1) COUNT  
F.S.S. 812.014(2)(b), Grand Theft 2nd Degree ONE (1) COUNT



Affiant/Detective Rebeca Perez  
Miami-Dade Police Department,  
Economic Crimes Bureau,  
Arson Squad

SWORN TO AND SUBSCRIBED before me on this 26<sup>th</sup> day of April, 2019.

  
\_\_\_\_\_  
Judge of the Circuit Court  
Of the Eleventh Judicial  
Circuit of Florida

**STACY D. GLICK**  
**Circuit Court Judge**

Affiant's Initials RP

ASA Initials JP

Judge's Initials SD