

WARRANT TYPE: ARREST WARRANT
AWPS#: 15000728
COURT CASE NUMBER:

CASE TYPE: FELONY
REFILE INDICATOR:
DIVISION:

TO ALL AND SINGULAR SHERIFFS OF THE STATE OF FLORIDA, GREETINGS:
YOU ARE HEREBY COMMANDED TO IMMEDIATELY ARREST THE DEFENDANT AND BRING HIM OR HER BEFORE ME, A JUDGE IN THE 11TH JUDICIAL CIRCUIT OF FLORIDA, TO BE DEALT WITH ACCORDING TO LAW:

DEFENDANT'S NAME: JAREMKO EDWARD JOSEPH
LAST FIRST MIDDLE TTL

AKA(S):

STR/APT/CITY/ST/ZIP: 11260 SW 52 TERR / / MIAMI / FL/ 33165
DOB: 12/10/1960 RACE: W SEX: M HEIGHT: 509 WEIGHT: HAIR: EYES: BRO
SOC SEC #: 265-55-1886 CIN #: SID #: FBI #: IDS #: 3012234
SCARS, MARKS, TATTOOS:
DRIVERS LICENSE #: J652-230-60-450-0 STATE: FL
VEH TAG #: STATE: MAKE: MODEL: YEAR: COLOR:
COMMENTS: AFFIANT IS JONATHAN RENFROE

PROBATION:

BEFORE ME PERSONALLY CAME NOT, ASSIGNED (AFFIANT) WHO, BEING DULY SWORN, STATES THAT THE DEFENDANT ** JAREMKO, EDWARD JOSEPH **, DID COMMIT THE ACTS STATED IN THE ATTACHED STATEMENT OF FACTS. BASED UPON THIS SWORN STATEMENT OF FACTS, I FIND PROBABLE CAUSE THAT ** JAREMKO, EDWARD JOSEPH ** DID COMMIT THE CRIME(S) OF:

F 1 817.234(1) INSURANCE CLAIMS/FALSE/FRAUDULENT/100K \$ 30,000 w/ Nobbra
F 1 812.014(2)(A) GRAND THEFT 1ST DEGREE/100K \$ 30,000 w/ Nobbra

IN DADE COUNTY, FLORIDA, CONTRARY TO FLORIDA STATUTES AND AGAINST THE PEACE AND DIGNITY OF THE STATE OF FLORIDA.

POLICE CASE #: 141753 AGENCY: OFFICE OF THE STATE ATT
ASSISTANT STATE ATTORNEY: URIARTE, LAURA UNIT: 065

EXTRADITE INFORMATION

EXTRADITION CODE: 1 - FELONY - FULL EXTRADITION UNLESS OTHERWISE NOTED IN MIS FIEL
EXTRADITION MAY BE CONFIRMED WITH THE METRO-DADE POLICE DEPARTMENT, DADE COUNTY
** IN ANY EVENT, DEFENDANT WILL BE ARRESTED IF FOUND IN THE STATE OF FLORIDA **

SWORN TO BY AFFIANT NOT, ASSIGNED COURT ID 056- 9999
SO ORDERED THIS 16 DAY OF September, 2015.

M. Baer

\$60,000
BOND AMOUNT

JUDGE IN THE 11TH JUDICIAL CIRCUIT IN AND FOR DADE COUNTY FLA
() FIRST APPEARANCE JUDGE MAY NOT MODIFY CONDITION OF RELEASE _____
(RULE 3.131(D)(1)(D))

() TO ANSWER UNTO THE STATE OF FLORIDA ON AN INFORMATION OR INDICTMENT FILED AGAINST HIM OR HER BY THE STATE ATTORNEY FOR THE CHARGE(S) OF:
() UPON ORDER OF A JUDGE IN THE ELEVENTH JUDICIAL CIRCUIT OF FLORIDA FOR FAILURE TO APPEAR IN COURT TO ANSWER THE PENDING CHARGE(S) FOR THE CHARGE(S) OF:

HARVEY RUVIN, CLERK OF THE COURT

BY _____ DEPUTY CLERK _____ DATE

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

Before me, Victoria Brennan, a Judge of the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida, personally appeared Detective Jonathan K Renfro of the Florida Department of Financial Services, Division of Insurance Fraud, who being by me first duly sworn, deposes and says that he has probable cause to arrest EDWARD JOSEPH JAREMKO, W/M D.O.B, December 10, 1960, hereinafter referred to as the defendant, for the offenses of Insurance Fraud in violation of Florida Statute 817.234 and Grand Theft in the First Degree in violation of Florida Statute 812.014.

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

Your Affiant, Jonathan K Renfro, is a Detective with the Florida Department of Financial Services, Division of Insurance Fraud. Your Affiant has been employed in this capacity over 4 years. Prior to joining the State of Florida, Department of Financial Services, Division of Insurance Fraud Your Affiant worked as a Corrections officer for the State Of Florida Department of Corrections, Sergeant for the State of Florida Department of Corrections, Police Officer for Florida State University, Youth Custody Officer for the Florida Department of Juvenile Justice assigned to the Miami-Dade Police Department Warrants Bureau between 2003 and 2010, and a Juvenile Detention Officer.

Your Affiant was assigned to investigate the facts and circumstances surrounding police case number 14-1753. This affidavit is intended as a summary, and is intended solely for the purposes of establishing probable cause for the arrest of the individuals involved. This investigation was conducted by the Florida Department of Financial Services, Division of Insurance Fraud, the State Fire Marshals Office and the Miami Dade Police Department.

On September 29, 2011 George Debs signed a Contract and Authorization for Claim Representation Agreement with ICC Public Adjusters, Inc. ICC Public Adjusters is owned and operated by, the co-defendant, Raul Enrique Rivero.

In September or October, 2011, ICC Public Adjusters, submitted an insurance claim on behalf of George and Vivian Debs with Prepared Insurance Company, for a water loss which allegedly occurred at their home located at 11300 SW 99th Court Miami Florida 33176. The alleged water loss was reported to the insurance company as having occurred on the morning of September 26, 2011.

In September or October, 2011, ARKO Plumbing owned and operated by Edward Joseph Jaremko submitted a bill to Prepared Insurance Company in the amount of \$38,979.24 for the work performed in the above described property by ARKO Plumbing, hereinafter referred to as "ARKO".

On October 14, 2011, Aqua Cap, a water mitigation company owned and operated by Thais Carbonell, submitted to Prepared Insurance Company an invoice in the amount of \$5,358.16 for the work allegedly performed in the above described property by Aqua Cap.

Judge's Initials VB
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ASA'S Initials SR

On November 21, 2012, as a part of a Civil Lawsuit initiated on behalf of George and Vivian Debs, George Debs answered questions under oath as part of a deposition. George Debs explained that on September 26, 2011 he woke up at around 6:50 or 7:00 and took a shower. He was in the shower for maybe fifteen (15) to twenty (20) minutes and while in the shower the water flow seemed normal and the water did not "backup." Upon exiting the shower he saw water on the floor of the bathroom and later noticed water everywhere throughout house. After his shower, and as he walked through the house, he noticed water coming out of a second bathroom in the home but this water had not yet reached the hallway. His children alerted him to water coming up in the kitchen and it appeared to be coming from underneath the kitchen cabinets. He described the water as "slow rolling water." He said that upon noticing the water through the house he went around turning off "stuff" and tried to mop up for a period of possibly five (5) minutes before he left the house as he had to take his children to school. He also saw water on the floor of his garage and described this water also as "rolling" but attributed this to the angle of the garage floor.

George Debs further testified that he returned home after dropping his children off at school. Upon his return he began to look for the cause of the water but was unable to determine where the water was coming from and decided to call a plumber. He looked in the paper and in the Yellow pages in order to find a plumber and saw a name he recognized from signs he had seen in the neighborhood, "ARKO." George Debs then called ARKO. George Debs was asked during this deposition if he had been told by anyone about ARKO before he called them, and he specifically answered, "No. I had never dealt with him before."

George Debs indicated that approximately an hour after making this first phone call to ARKO on the morning of the 26th, an individual that identified himself as Joe Jaremko arrived at his home, looked at the water on the floor and called his workers to the Debs home. Joe Jaremko told him "You're going to have to dry this up or it's going to mess up everything". Joe Jaremko recommended a water mitigation company named "Aqua Cap" which was owned and operated by Joe Jaremko's girlfriend.

On September 26, 2011, Aqua Cap was called in order for them to respond to the above-described property and mitigate the damages. Representatives from Aqua Cap arrived at the house and began the water mitigation process by removing baseboards, drilling holes in the baseboards of the kitchen cabinets, setting up blowers, heaters and other specialty equipment used in the removal of moisture in areas allegedly affected by the overflowing water. An employee of ARKO and Aqua Cap, John Collucci, prepared an estimate detailing the work performed on behalf of Aqua Cap by using Xactimate. Xactimate is estimating software routinely used to determine the cost of restoration, repair and remodeling. This estimate was then submitted to Prepared Insurance Company as part of this water loss claim.

George Debs explained that when ARKO employees arrived at his home one of them went on the roof and the others started looking around. When asked if the ARKO employees had started the repair process prior to Aqua Cap arriving, George Debs said, "I wouldn't call it repairs but they had started working already." When asked what the ARKO employees were doing, he replied, "they were like busting walls and going through the roof with a camera into

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the pipes and doing all sorts of stuff; they were mostly working in this bathroom.” ARKO employees trenched the entire home removing all of the existing cast iron drain pipes, gutting at least one bathroom and knocking holes in the exterior walls to access plumbing for the kitchen area before the insurance company was notified of the loss. John Collucci also prepared an estimate detailing the work performed on behalf of ARKO by using Xactimate. This estimate was then submitted to Prepared Insurance Company as part of this water loss claim.

In order to investigate the statements by George Debs Prepared Insurance Company obtained the cell phone records from Verizon Wireless for the account Edward Jaremko and his cell (305) 978-6937. A review of these records by your Affiant revealed that on September 25, 2011, at 9:18PM, a day before the alleged water loss, George Debs received a phone call on his cell from Mr. Jaremko. An individual that George Debs stated under oath, he did not know nor met until September 26, 2011.

In addition, the legal representatives for Prepared Insurance Company retained the services of Mr. Daniel L Regard II, Managing Director of iDiscovery Solutions, Inc. Mr. Regard holds a BS in Computer Science, University of Southwestern Louisiana; JD, Tulane University; MBA, Tulane University; Certificate in European Legal Practice, Tulane University, E-Discovery Special Master in US District Court, District of Columbia 2010-2011 and has ten (10) years of experience testifying in this field. Mr. Regard II was hired to forensically examine computers and/or forensically examine sound images of computers used in the preparation of documents submitted to Prepared Insurance Company in relation to the claim submitted by or on behalf of George and Vivian Debs.

Mr. Daniel L. Regard II reviewed four (4) forensically sound images, the deposition of John Collucci, and the materials published by Xactware relating to the version releases of Xactimate, and the usage of Xactimate. Three (3) of the forensic images received by Mr. Regard II, were prepared by Computer Forensic Resources. A fourth forensic imaging was performed by iDiscovery Solutions, Inc. from a computer sent to their company via courier directly from John Collucci.

As reported by Mr. Regard II, the Xactimate software creates an Audit Trail for each of its internal “project” files. This Audit Trail is an internal record of all activities within a project including creation of the project, project access times, and import activity from other files into the project. The time and date stamps recorded in the Audit Trail are taken from the computer being used at the time the entry is recorded. Xactimate verifies the time and date of the computer when the software is first booted up for a given usage session. The date and time is confirmed via the Internet and via the usage history of the software. When the user’s computer is connected to the Internet, the software automatically connects to the Xactimate servers to compare the local date and time information to the date and time information at Xactimate. If these two dates and times differ by more than 24 hours, the software will display an error message, and disable the software (invoke a lock-out) until a Xactimate support representative remotely connects to the local computer and unlocks the software. If the user’s computer is not connected to the Internet, the software compares the current time and date to the time and date of the last usage session. In this instance, if the current time and date are earlier than the last known time and date (i.e. if the computer has been back dated), again the software would display an

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error message and disable the software, requiring an Xactimate representative to unlock the software.

During this examination two (2) files of significance related to the Debs claim were located within the Xactimate software found within the computer. On September 23, 2011 at 1:54 pm a file was created by John Colluci using Xactimate regarding the work performed by Aqua Cap relating to this water loss claim by George and Vivian Debs. This file was created with a final estimate amount of \$5,358.16 and had final entry date of September 04, 2012. This file was first created three (3) days prior to the alleged water loss of September 26, 2011 as reported by or on behalf of George and Vivian Debs to Prepared Insurance Company. Aqua Cap submitted to Prepared Insurance Company a bill totaling, \$5,358.16 for the work performed at the Debs house.

The second file of significance was for ARKO and was created September 21, 2011 at 12:24 pm and had a final entry date of July 02, 2013, and was created by John Colluci. This file was a bill in the amount of \$40,479.24. This file was created five (5) days prior to the alleged water loss of September 26, 2011. ARKO submitted a bill to Prepared Insurance Company as part of this water loss claim.

Based on the Audit Trail information of the identified project files related to this claim for ARKO and Aqua Cap, the files were created and then edited on and between several dates. File, 'DEBS-CRDITS-TO-NSUR.esx' (ARKO PLUMBING) was created on September 21, 2011 at 12:24PM with a final entry of July 2, 2013 at 4:25PM. File "DEBS.esx" (Aqua cap) was created on September 23, 2011 at 1:54pm with a final entry date of September 4, 2012.

In addition, in order to validate the integrity and reliability of the date within the Audit Trail in Xactimate, Mr. Regard II performed several different tests. Mr. Regard II was unable to alter the Audit Trail from within the Xactimate software. The program did not allow this functionality. Mr. Regard II determined that the user could not change or modify the Audit Trail, other than by adding new information thru new additional or edits. Pre-existing entries could not be modified. Mr. Regard II further determined that the Xactimate's built-in date and time confirmation prevented any back dating of the computer and creating a new file purporting to be from a previous time period.

Mr. Regard II concluded based on his testing that the software does not allow a user to alter the Audit Trail information, the file could not be altered with standard software tools and the Xactimate software has internal controls that prevent the user from backdating the system in the normal course of business.

On or about October 07, 2011 ICC Public Adjusters submitted an "Adjuster Summary" to Prepared Insurance Company documenting the cost of items that would need to be removed and, replaced, materials and/or labor to do items contained the list for a total of \$73,548.44. ICC Public Adjusters also submitted numerous photos of the Debs home in various states of demolition, in support of this claim. An analysis of the meta date of the jpeg images of the photographs submitted revealed the make and model of the camera used to take thirteen (13) of these photographs and also revealed the date and time the image on these thirteen (13) photos

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was captured. The metadata indicated that thirteen (13) of the photos submitted as furtherance of this claim were taken on September 15, 2011, eleven (11) days prior to the alleged water loss which according to George and Vivian Debs happened on September 26, 2011. It should be noted that the data is derived from the user inputted data; i.e. the owner of the camera at the time purchase or sometime after that manually entering the date and time into the camera memory. The metadata also revealed the photos timed between 9:00pm and 10:19pm, but the image captured depicts they were taken in the daytime.

On November 3, 2014, the Honorable Judge Migna Sanchez-Llorens issued an arrest warrant for George Debs for the charges of Grand Theft 1st Degree and Insurance Fraud 1st Degree. On November 4, 2014, George Debs was arrested and subsequently charged via Information with Grand Theft 1st Degree and Insurance Fraud 1st Degree.

Following the arrest, Mr. and Mrs. Debs provided statements to law enforcement. Mr. and Mrs. Debs admitted that the water loss suffered at the property was in early to mid-September 2011 and not on September 26, 2011 as was reported by the defendant and co-defendant to Prepared Insurance. They further stated that the defendant and the co-defendant were aware of when the real date of the water loss was, as they were notified by Mr. Debs of the original water loss, had responded to the home and had observed the repairs done by a previous plumber. Mr. Debs specified that the co-defendant was the one that brought defendant, Joe Jaremko, to the house and admitted that he had lied to the insurance company regarding his initial contact with Joe Jaremko, as instructed. Mr. and Mrs. Debs stated that during conversations with the co-defendant and the defendant they were told that they needed to report the claim to the insurance company in a certain way or their claim would be denied. They were told that they needed to lie to the insurance company and that they needed to say that the water loss was due to a sudden event and that they specifically needed to say that they had suffered water damages as a result. Both Mr. and Mrs. Debs admitted that what they had reported and/or testified, as instructed, was a lie, since they did not observe water throughout the house and the garage nor did they suffer any water damages inside the house.

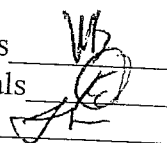
In addition, during conversations with the co-defendant and the defendant Mr. and Mrs. Debs were specifically told not to disclose to the insurance company that ARKO was not the first plumbing company to perform repairs, as it was explained that if they reported the visit and repairs by the first plumber, the insurance company could deny their claim. Mr. and Mrs. Debs further stated that several days prior the report date of 9-26-2011, an employee of ARKO had been to the house to take measurements and prepare a report of the water loss. This statement corroborates the findings by Mr. Daniel L. Regard II, in the review of the Xactimate program, wherein it was discovered that the reports presented in support of the insurance claim filed by the defendant were first generated on September 21 and 23, 2011, days prior the reported date of loss.

The total claim submitted on behalf of George and Vivian Debs to Prepared Insurance Company totaled \$ 117,886.84; Aqua Cap/ \$5,358.16, ARKO/ \$38,979.24, and ICC Public Adjuster/\$73,548.44.

Judge's Initials

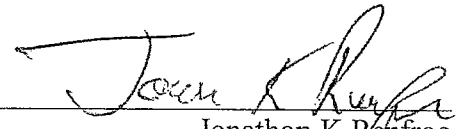
Affiant's Initials

ASA'S Initials

Handwritten initials and signatures for the Judge, Affiant, and ASA.

On January 14, 2015, Vivian Debs identified photographs of John Collucci, Joe Jaremko and Raul Rivero. On March 11, 2015, George Debs identified photographs of John Collucci, Joe Jaremko and Raul Rivero

Whereas, based on the aforementioned probable cause, Your Affiant respectfully request this Honorable Court to issue an arrest warrant for Edward Joseph Jaremko for actions in violation of Florida State Statues 812.014 (2)(a)1 Grand Theft 1st Degree/\$100,000 or more, and Insurance Fraud 817.234 11(c) First Degree/ \$100,000 or more


Jonathan K Renfro
Detective 80-701

Sworn and subscribed before me this 16th day of September, 2015


Circuit Court Judge

Judge's Initials WB
Affiant's Initials ED
ASA'S Initials AK