

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CRIMINAL DIVISION

STATE OF FLORIDA

CASE NUMBER: 23-11495-CF-A

vs.

(A) PAUL VAUTOUR

(B) KIANA VAUTOUR

Defendants.

**ISSUE
CAPIAS**

INFORMATION FOR:

COUNT 1:

**AGGRAVATED WHITE-COLLAR
CRIME**

F.S. 775.0844

First Degree Felony -
Level 9

Defendant A

COUNT 2:

GRAND THEFT

F.S. 812.014(2)(b)(1)

Second Degree Felony -
Level 6

Defendants A and B

COUNT 3:

GRAND THEFT

F.S. 812.014(2)(b)(1)

Second Degree Felony -
Level 6

Defendant A

COUNT 4:

GRAND THEFT

F.S. 812.014(2)(b)(1)

Second Degree Felony -
Level 6

Defendant A

COUNT 5:

GRAND THEFT

F.S. 812.014 (2)(c)3
Third Degree Felony -
Level 4
Defendant A

COUNT 6:

GRAND THEFT

F.S. 812.014 (2)(c)3
Third Degree Felony -
Level 4
Defendant A

COUNT 7:

GRAND THEFT

F.S. 812.014 (2)(c)3
Third Degree Felony -
Level 4
Defendants A and B

COUNT 8:

**CRIMINAL USE OF PERSONAL
IDENTIFICATION
INFORMATION (\$5,000 OR
MORE)**

F.S.
817.568(2)(b)/775.087,
Florida Statutes
Second Degree Felony-
Level 5
3-year Minimum Mandatory
Defendants A and B

NICHOLAS B. COX, Statewide Prosecutor for the State of Florida,
by and through the undersigned designated Assistant Statewide
Prosecutor, under oath, charges that,

COUNT 1
AGGRAVATED WHITE-COLLAR CRIME

Beginning on or about **September 19, 2019** and continuing through **October 28, 2020**, in the Sixth and Thirteenth Judicial Circuits; to-wit: Pinellas, Pasco and Hillsborough Counties, Florida, respectively, **PAUL VAUTOUR**, did engage in two or more white collar crimes to wit: Grand Theft(s) (Fla. Stat 812.014), that had the same or similar intents, results, accomplices, victims or method of commission or were otherwise interrelated by distinguishing characteristics and were not isolated incidents, and in doing so did victimize the State of Florida, any state agency, any of the state's political subdivisions, or any agency of the state's political subdivisions, and thereby obtained or attempted to obtain \$50,000 or more, contrary to the White Collar Crime Victim Protection Act, Section 777.0844, Florida Statutes.

COUNT 2
GRAND THEFT

Beginning on or about October 20th, 2020, and continuing through October 28th, 2020, in the Thirteenth Judicial Circuit; to-wit: Hillsborough County, Florida, **PAUL VAUTOUR and KIANA VAUTOUR** did knowingly obtain, or endeavor to obtain, the property of Citizens Property Insurance Corporation to wit: U.S. currency worth \$20,000.00 or more but less than \$100,000.00 with the intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or to appropriate the property to defendants' own use or to the use of a person not entitled thereto, contrary to Chapter 812.014 (2)b)1, Florida Statutes.

COUNT 3
GRAND THEFT

Beginning on or about January 30th, 2020, and continuing through March 20th, 2020, in the Sixth Judicial Circuit; to-wit: Pinellas County, Florida, respectively, **PAUL VAUTOUR** did knowingly obtain, or endeavor to obtain, the property of Citizens Property Insurance Corporation to wit: U.S. currency worth \$20,000.00 or more but less than \$100,000.00 with the intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or to appropriate the property to defendants' own use or to the use of a person not entitled thereto, contrary to Chapter 812.014 (2)(b)1, Florida Statutes.

COUNT 4
GRAND THEFT

Beginning on or about September 19, 2019, and continuing through September 21, 2019 , in the Sixth Judicial Circuit; to-wit: Pasco County, Florida, respectively, **PAUL VAUTOUR** did knowingly obtain, or endeavor to obtain, the property of Citizens Property Insurance Corporation to wit: U.S. currency worth \$20,000.00 or more but less than \$100,000.00 with the intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or to appropriate the property to defendants' own use or to the use of a person not entitled thereto, contrary to Chapter 812.014(2)b)1, Florida Statutes

COUNT 5
GRAND THEFT

Beginning on or about October 13, 2019, and continuing through October 23rd, 2019, in the Sixth Judicial Circuit; to-wit: Pinellas County, Florida, respectively, **PAUL VAUTOUR** did knowingly obtain, or endeavor to obtain, the property of Citizens Property Insurance Corporation to wit: U.S. currency worth \$10,000.00 or more but less than \$20,000 with the intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or to appropriate the property to defendants' own use or to the use of a person not entitled thereto, contrary to Chapter 812.014(2)(c)3, Florida Statutes.

COUNT 6
GRAND THEFT

Beginning on or about December 3rd, 2019, and continuing through December 12th, 2019, in the Sixth Judicial Circuit; to-wit: Pinellas County, Florida, respectively, **PAUL VAUTOUR** did knowingly obtain, or endeavor to obtain, the property of Citizens Property Insurance Corporation to wit: U.S. currency worth \$10,000.00 or more but less than \$20,000 with the intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or to appropriate the property to defendants' own use or to the use of a person not entitled thereto, contrary to Chapter 812.014 (2)(c)3, Florida Statutes.

COUNT 7
GRAND THEFT

Beginning on or about May 15, 2021, and continuing through May 17, 2021 in the Sixth Judicial Circuit; to-wit: Pasco County, Florida, respectively, **PAUL VAUTOUR and KIANA VAUTOUR** did knowingly obtain, or endeavor to obtain, the property of Security First Insurance to wit: U.S. currency worth \$10,000.00 or more but less than \$20,000 with the intent to temporarily or permanently deprive Security First Insurance of a right to the property or benefit therefrom, or to appropriate the property to defendants' own use or to the use of a person not entitled thereto.

Count 8
CRIMINAL USE OF PERSONAL IDENTIFICATION INFORMATION
(\$5,000 OR MORE)

Beginning on or between May 15, 2021 through May 17, 2021, in the Sixth Judicial Circuit; to-wit: Pasco County, Florida, **KIANA VAUTOUR and PAUL VAUTOUR**, did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, HARRIET BRAUNER, without first obtaining HARRIET BRAUNER'S consent, and the pecuniary benefit, the value of the services received or the payment sought to be avoided, or the amount of the injury or fraud perpetrated was \$5,000 or more, contrary to Chapter 817.568 (2)(b)/775.087, Florida Statutes, and against the peace and dignity of the State of Florida.

AND ALL OF SAID OFFENSES OCCURRED IN TWO OR MORE JUDICIAL CIRCUITS OF FLORIDA AS PART OF A RELATED TRANSACTION OR OCCURRED IN EVERY JURDICIAL CIRCUIT WITHIN THE STATE BY USE OF THE INTERNET, OR ALL OF SAID OFFENSES WERE COMMITTED IN CONNECTION WITH AN ORGANIZED CONSPIRACY AFFECTING TWO OR MORE JUDICIAL CIRCUITS.

AND SAID OFFENSES BEING AGAINST THE PEACE AND DIGNITY OF THE STATE OF FLORIDA.

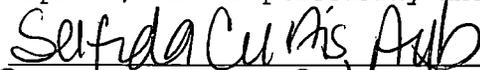
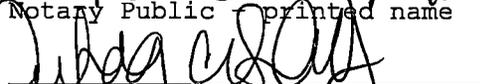
NICHOLAS B. COX
STATEWIDE PROSECUTOR
STATE OF FLORIDA



PANAGIOTA PAPAKOS
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STATE OF FLORIDA
COUNTY OF HILLSBOROUGH

Before me, the undersigned authority, personally appeared, PANAGIOTA PAPAKOS, Specially Designated Assistant State Attorney and Assistant Statewide Prosecutor, who, first being duly sworn, say that the allegations as set forth in the foregoing Information are based upon facts that have been sworn to as true, and which, if true, would constitute the offenses therein charged, that the prosecution is instituted in good faith, and certifies that she has received testimony under oath from the material witness or witnesses for the offenses. Sworn to and subscribed before me this 28 day of November 2023 by Panagiota Papakos, who is personally known to me.


Notary Public - printed name

Notary Public - signature
State of Florida At Large



IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

WITNESS AFFIDAVIT

STATE OF FLORIDA

V.

CASE NUMBER:

(A) PAUL VAUTOUR

(B) KIANA VAUTOUR
Defendant.

_____ /

BEFORE ME, Chris Helmer, Judge of the Sixth
Judicial Circuit in and for Pinellas County, Florida, personally
appeared Lieutenant Michael Scott of the Florida Department of
Financial Services, Division of Investigative and Forensic
Services (DIFS), Bureau of Insurance Fraud, who, being first sworn,
deposes and says:

Your Affiant is a sworn law enforcement officer of the State
of Florida, and as such is empowered to conduct investigations of
and make arrests for violations of the criminal laws of the State
of Florida, including those enumerated in Chapters 775.0844, 812,
and 817, Florida Statutes, pertaining to white collar crime, grand
theft, and criminal use of personal identification information and

believes that laws of the State of Florida have been violated, specifically those laws enumerated in Chapters 775.0844, 812.014, 817.568 pertaining to Aggravated White Collar Crime, Grand Theft and Criminal Use of Personal Identification, and, the persons violating those laws are **PAUL DAVID VAUTOUR** and **KIANA MARIA VAUTOUR**, as identified above.

In investigating this case, Your Affiant reviewed all initial officers' reports, supplementary reports including witness statements and interviews, insurance records, inspection reports, video surveillance and subpoena responses, and your Affiant has also conducted follow-up investigations. The reasons for your Affiant's belief that the above listed laws have been violated and that **PAUL DAVID VAUTOUR** AND **KIANA MARIA VAUTOUR** are the persons who violated said laws are as follows:

Your Affiant, Lieutenant Michael Scott, has been a law enforcement officer in the State of Florida for over eighteen years and has received training for and conducted investigations related to insurance fraud, schemes to defraud, money laundering, human smuggling, drug trafficking, criminal use of personal identification information, and trafficking in or possessing counterfeit credit cards. During that time, Your Affiant has authored numerous search warrants, arrest warrants and orders for electronic surveillance pertaining to the aforementioned crimes. Your Affiant is currently employed as a sworn law enforcement officer with the Florida Department of Financial Services, Division of Investigative and Forensic Services (DIFS),

Bureau of Insurance Fraud, and is assigned to the general fraud division in the Saint Petersburg Regional Office.

This case is being prosecuted by the Florida Attorney General's Office, Office of Statewide Prosecution. The investigation is aggregated and summarized as follows¹:

As part of this investigation, Your Affiant learned that Citizens Property Insurance Corporation ("Citizens") Special Investigations Unit ("SIU") had initiated an investigation of a business entity and roofing contractor, Benchmark Consulting d/b/a Castle Roofing & Construction, Inc. ("Castle Roofing").

Pursuant to Florida Statutes § 627.351, Citizens Property Insurance Corporation is a government entity in the State of Florida, and not a private insurance company. Citizens Property Insurance Corporation provides insurance for residential and commercial property for Floridians who are unable to procure insurance through the voluntary market.

Your Affiant learned that Citizens had received notification concerning possible fraudulent roof damage claims that were initiated by employees from Castle Roofing. Your Affiant learned that Citizens' internal investigation of supposed weather-related

¹NOTE: All statements referred to are "in substance," unless contained in quotation marks. All communications that are quoted below are quoted as they appeared in the communication, including misspellings or apparent typing errors of the communicator. As well, while your Affiant attempts to be as precise as possible, all described times should be considered approximate.

roofing claims submitted by Castle Roofing employees had revealed a pattern of damage that was consistent with man-made manipulation of roof coverings. As a result of this information, Citizens initiated video surveillance on several pending insurance claims involving Castle Roofing.

In summary, Your Affiant learned that surveillance revealed that employees of Castle Roofing would manually bend shingles on roof coverings to replicate damage caused during an alleged wind event. Your Affiant learned that on most occasions this would occur prior to the adjuster's arrival at the subject property. Citizens later notified the Florida Department of Financial Services, Bureau of Insurance Fraud concerning the findings of their internal investigation. As a result, Your Affiant participated in an independent criminal investigation of Castle Roofing employees and their business practices in Pinellas, Pasco, and Hillsborough Counties.

Through subsequent investigation, Your Affiant learned that Castle Roofing & Construction, Inc., was registered as a fictitious name by Benchmark Consulting, Inc., on February 17, 2014, in Pinellas County, Florida. Your Affiant identified PAUL DAVID VAUTOUR as the Vice President of Sales Operations for Castle Roofing. Through additional investigation, Your Affiant learned PAUL DAVID VAUTOUR's daughter, KIANA MARIA VAUTOUR, also performed work on behalf of Castle Roofing.

As part of the investigation into the company's business practices, Your Affiant learned that Castle Roofing would frequently utilize employees as "door knockers" to canvass neighborhoods and offer homeowners free roof inspections. Other times, homeowners would reach out to Castle Roofing on their own accord. Your Affiant learned that once a homeowner engaged Castle Roofing representatives to repair or replace their roof, the Castle Roofing employees would then require the homeowner to sign an "Assignment of Benefits" (A.O.B.) as part of their "Contract for Roofing Services." Castle Roofing employees would then facilitate an insurance claim to obtain funding for a roof replacement. Further, a Castle Roofing employee would then go onto the roof and mark the alleged wind damage with chalk to "assist" the insurance representative in observing the alleged damage. Your Affiant also learned that Castle Roofing employees would utilize computer software to determine possible dates of weather events with high winds. Your Affiant learned that on many occasions the roofs inspected were past their useful life and in need of total replacement.

As part of this investigation, Your Affiant reviewed individual roofing claims that Castle Roofing had submitted to Citizens. This included surveillance, video recordings, photographs, claim files, engineer's reports, and transcripts of Examinations Under Oath. Your Affiant also reviewed a claim

submitted to Security First Insurance. The facts surrounding each claim are as follows:

8204 Lora Del Rio Drive, Port Richey, FL 34688

Your Affiant learned that homeowner Maris Pareisz, now deceased, had signed an Assignment of Benefits as part of a "Contract for Roofing Services" with Castle Roofing Vice President of Sales PAUL DAVID VAUTOUR on September 19, 2019. This allowed Castle Roofing to directly handle his insurance claim for his residence located at 8204 Lora Del Rio Drive, Pasco County, Florida 34688. Your Affiant learned that Pareisz stated that he contacted Castle Roofing after being referred by a neighbor.

As part of this roof claim, Your Affiant learned that Pareisz executed a "Contract for Roofing Services" with Castle Roofing that contained a recommendation for a full replacement of the roof. This Contract and Estimate was e-mailed to Citizens as part of the claim on September 21, 2019. Your Affiant later learned that Castle Roofing made a demand of \$22,362.70 for this roof replacement.

After the Contract was signed, Your Affiant also learned that Castle Roofing Employee Lucas Sloan called Citizens on September 21, 2019 to report damage to the roof at 8204 Lora Del Rio Drive, Pasco County, Florida 34688. Sloan reported wind had creased shingles during a thunderstorm. Sloan did not report any interior

damage to the residence. Sloan stated that this damage had occurred during a storm on August 9, 2019.

On September 26, 2019, professional claims investigative agency Kelley Alliance conducted video surveillance at the above location on behalf of Citizens. Your Affiant reviewed the video surveillance as part of this investigation. On the surveillance recording from that date, PAUL DAVID VAUTOUR can be observed arriving at the property prior to the insurance adjuster's arrival. VAUTOUR was captured on surveillance video lifting shingles on the side of the Pareizs' roof and placing chalk marks over the area:





Your Affiant further reviewed the transcript of an Examination Under Oath of PAUL DAVID VAUTOUR that took place on March 26, 2020 as part of the insurance investigation of this claim. During this examination, VAUTOUR stated that he had never been on the Pareizs roof because he "didn't need to." This statement is in direct contradiction with the video surveillance Your Affiant reviewed.

Your Affiant learned that an engineer from Structural Engineering and Inspections, Inc, ("SEI") later inspected the Pareizs' residence on October 2, 2019, and documented their

findings in a report. The report states that the damaged shingles on this roof were debonded and creased, but not in a manner consistent with wind event damage. Your Affiant also learned that engineers found that there was not a significant wind event on the date of loss. Further, the damage to the roof was less than 25% of the roof area and the reparability of the roof was good.

30 Pinewood Circle, Safety Harbor, FL 34695

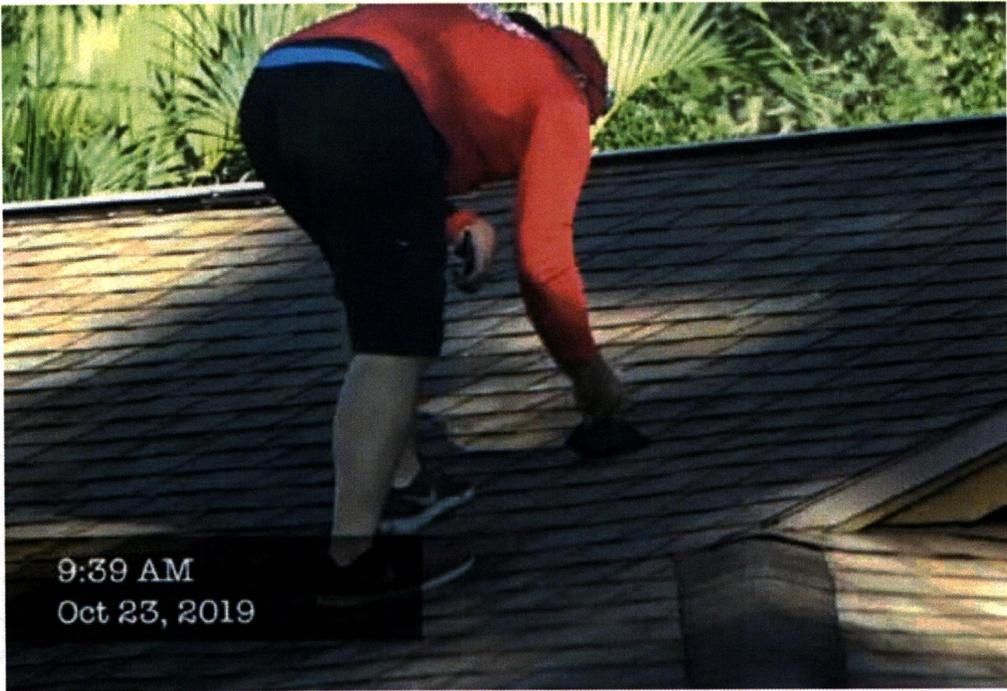
Your Affiant learned that homeowner Suppatra Head-Bowers had signed an Assignment of Benefits as part of a "Contract for Roofing Services" with Castle Roofing Vice President of Sales PAUL DAVID VAUTOUR on October 13, 2019. This allowed Castle Roofing to directly handle her insurance claim for her residence located at 30 Pinewood Circle, Safety Harbor, Pinellas County, Florida 34695. Your Affiant learned that Bowers stated that she contacted Castle Roofing in late 2019 after she noticed a leak inside the attic. Bowers stated that Castle Roofing employee PAUL DAVID VAUTOUR told her that she could have her roof fixed through an insurance claim.

As part of this roof claim, Your Affiant learned that Bowers executed a "Contract for Roofing Services" with Castle Roofing that contained a recommendation for a full replacement of the roof and an initial estimate signed by PAUL DAVID VAUTOUR for fifteen

thousand dollars (\$15,000). This Contract and Estimate was e-mailed to Citizens as part of the claim on October 14, 2019.

After the Contract was signed, Your Affiant also learned that Castle Roofing Employee Lucas Sloan called Citizens on October 14, 2019 to report damage to the roof at 30 Pinewood Circle, Safety Harbor, Pinellas County, Florida 34695. Sloan reported wind had creased shingles during a thunderstorm. Sloan did not report any interior damage to the residence. Sloan stated that this damage had occurred during a storm on August 9, 2019.

On October 23, 2019, professional claims investigative agency Kelley Alliance conducted video surveillance at the above location on behalf of Citizens. Your Affiant reviewed the video surveillance as part of this investigation. On the surveillance recording from that date, PAUL DAVID VAUTOUR can be observed arriving at the property prior to the insurance adjuster's arrival. VAUTOUR was captured on surveillance video lifting shingles on the side of the Head-Bowers' roof and placing chalk marks over the area:



Your Affiant further reviewed the transcript of an Examination Under Oath of PAUL DAVID VAUTOUR that took place on March 26, 2020 as part of the insurance investigation of this claim. During this examination, VAUTOUR denied manual manipulation of the roof shingles on the Bowers' residence for any reason. When asked if he was certain that he was not on the roof prior to the adjuster's arrival, Vautour responded "I was not on that roof ever until the adjuster got there." This statement is in direct contradiction with the video surveillance Your Affiant reviewed.

Your Affiant also learned that SDII Global Corporation later conducted an engineering inspection of the above residence on November 1, 2019, and documented their findings in a report. The report states that the horizontal creases in the exposed portion of the 10 unsealed shingles were a result of human activities not consistent with that commonly performed during the routine maintenance or access of roofs. Your Affiant also learned that engineers found that the weather data revealed that from August 1, 2019 through November 1, 2019, the closest report of maximum wind gust in the neighborhood of this property was not high enough to cause wind damage to competent dimensional fiberglass mat roof shingles.

1868 Greenhill Dr., Clearwater, FL 33755

Your Affiant learned that homeowner Donnie Miller had signed an Assignment of Benefits as part of a "Contract for Roofing Services" with Castle Roofing Vice President of Sales PAUL DAVID VAUTOUR on December 3, 2019. This allowed Castle Roofing to directly handle Miller's insurance claim for his residence located at 1868 Greenhill Dr., Clearwater, Pinellas County, Florida 33755. Your Affiant learned that Miller stated that he contacted Castle Roofing in late 2019 because they were working on a roof across the street from his residence. Miller stated that Castle Roofing employee PAUL DAVID VAUTOUR inspected his roof.

As part of this roof claim, Your Affiant learned that the executed "Contract for Roofing Services" contained a recommendation for a full roof replacement and an initial estimate in the amount of fourteen thousand three-hundred and seventy-five dollars and eighty-nine cents (\$14,375.89). This Contract and Estimate was e-mailed to Citizens as part of the claim on December 6, 2019.

Your Affiant also learned that on December 6, 2019, Castle Roofing Employee Lucas Sloan called Citizens to report damage to the roof at 1868 Greenhill Dr., Clearwater, FL 33755. Sloan reported missing and creased shingles. Sloan added that there was interior damage to the residence as well. Sloan stated that this

damage had occurred during a storm on September 1, 2019. During a subsequent interview with law enforcement, Your Affiant learned that the homeowner stated that he had received this date of loss from Castle Roofing employee PAUL DAVID VAUTOUR.

On December 12, 2019, professional claims investigative agency Kelley Alliance conducted video surveillance at the above location on behalf of Citizens. Your Affiant reviewed the video surveillance as part of this investigation. On the surveillance recording from that date, PAUL DAVID VAUTOUR can be observed lifting and unbinding shingles throughout the roof at this residence:





Your Affiant further reviewed the transcript of an Examination Under Oath of PAUL DAVID VAUTOUR that took place as a

result of as part of the insurance investigation of this claim on March 26, 2020. During this examination, Your Affiant learned that PAUL DAVID VAUTOUR stated under oath that he had not manipulated any shingles to determine the condition of this roof. This statement is in direct contradiction with the video surveillance Your Affiant reviewed.

Your Affiant learned that JS Held Engineering later conducted an engineering inspection of the above residence on January 16, 2020, and documented their findings in a report. The report states that there were no indications of strong wind forces on the residence during the inspection. Your Affiant learned that the damage to the shingles did not reflect wind as a directional event. The unbonded corners varied from left to right on the same slopes, which Your Affiant learned is inconsistent with wind damage. Your Affiant also learned that engineers found no evidence of any historical weather data on September 1, 2019 to indicate strong wind forces acting on the roof of this residence.

1743 Oak Park Ct., Tarpon Springs, FL 34689

During the course of this investigation, Your Affiant also learned that elderly homeowner Shirley Vines had allegedly signed an Assignment of Benefits as part of a "Contract for Roofing Services" with PAUL DAVID VAUTOUR on January 30, 2020. This allowed Castle Roofing to directly handle her insurance claim for her

residence located at 1743 Oak Park Ct., Tarpon Springs, Pinellas County, Florida 34689.

Your Affiant also learned that on the same date the assignment of benefits was allegedly signed, February 3, 2020, an individual stating that they were homeowner "Shirley Vines" placed a phone call to Citizens to report damage to the roof of her residence. During the phone call, this individual reported roof damage from a storm that had allegedly occurred on January 7, 2020.

Your Affiant also learned that PAUL DAVID VAUTOUR completed an estimate that was provided to Citizens on March 20, 2020 in the amount of twenty-five thousand nine-hundred and ninety dollars and sixty-nine cents (\$25,990.69) to address the roof as part of this claim.

Subsequent investigation by Your Affiant revealed that the voice on this phone call is inconsistent with that of the homeowner. At the time of the phone call, Shirley Vines was 98 years of age. Upon review of the recorded phone call, Your Affiant believed the voice of the supposed homeowner to be that of a much younger female.

On April 23, 2023, Your Affiant spoke with Barry Vines, the son of now deceased Shirley Vines. Barry Vines was also the co-owner of the above-listed residence. Barry Vines reviewed the recorded insurance claim phone call from February 3, 2020. Immediately upon hearing the voice of the female claiming to be

Shirley Vines, Mr. Vines informed Your Affiant that the voice claiming to be Shirley Vines on the call was not his mother's voice. Your Affiant also learned that Barry Vines had stated that his mother would not routinely answer the door or leave her residence often.

Your Affiant learned that professional claims investigative agency Kelley Alliance conducted surveillance at the above residence on February 5, 2020 on behalf of Citizens. Your Affiant reviewed this recorded surveillance. The video footage shows PAUL DAVID VAUTOUR lifting shingles and sweeping the shingles with his bare hands. VAUTOUR can also be seen raising one of the shingles, sweeping the shingles with his hand, and then placing debris under the shingle. VAUTOUR was also captured on footage using one of his hands to create a line (crease) in the shingle and sweep it after the action was completed:





Your Affiant learned that an engineer from Structural Engineering and Inspections, Inc, ("SEI") later inspected the Vines' residence on February 6th, 2020. The SEI engineering inspection report noted that no significant weather event was reported on the date of the alleged storm that was provided during the claim phone call. SEI found that the majority of the shingles on this roof were damaged from apparent, intentional man-made actions. Your Affiant learned that this was identified by shingles being consistently creased along the bottom corner of the top and uplifted in a manner consistent with hand-lifting and not by wind. During the inspection, SEI did note that some of the shingles had been damaged by wind as well. However, Your Affiant learned that

the report noted that wind damage was less than 25% of the roof area and that the shingle roof was near the end of its useful life.

8610 Bellevista Drive, Tampa, FL 33635

Your Affiant learned that homeowner Phillip Jackson had signed an Assignment of Benefits as part of a "Contract for Roofing Services" with PAUL DAVID VAUTOUR on October 20, 2020. This allowed Castle Roofing to directly handle his insurance claim for his rental property located at 8610 Bellevista Drive in Tampa, Hillsborough County, FL 33635.

Your Affiant also learned that on October 22, 2020, Castle Roofing employee KIANA MARIA VAUTOUR placed a phone call to Citizens to report damage to the roof of the Jackson residence. During the recorded phone call, she stated that the date of loss was September 9, 2020, and that there was roof damage and missing shingles from high winds.

Your Affiant learned that PAUL DAVID VAUTOUR provided an estimate on October 22, 2020 in the amount of twenty-four thousand dollars (\$24,000.00) to as part of this claim. Your Affiant learned that the estimate was submitted to Citizens via e-mail by KIANA MARIA VAUTOUR.

Your Affiant learned that professional claims investigative agency Kelley Alliance conducted video surveillance at the above location on October 28, 2020 on behalf of Citizens. Your Affiant

reviewed this video recording. The footage shows Castle Roofing employee PAUL DAVID VAUTOUR pulling up numerous roofing shingles and then marking the area with chalk:



Your Affiant learned that professional engineers of SDII Global later inspected the Jackson residence on December 3, 2020y and Your Affiant reviewed the inspection report. Your Affiant learned that while the report did not include damage determined to be caused by mechanical damage, engineers concluded that the roof had seventy-two (72) shingles that were damaged due to wind more than 3 years *prior* to the reported date of loss.

3528 Player Drive, New Port Richey, FL 34655

Your Affiant learned that homeowners Harriet and David Brawner had signed an Assignment of Benefits as part of a "Contract for Roofing Services" with Castle Roofing employee PAUL DAVID VAUTOUR on May 15, 2021. This allowed Castle Roofing to directly handle their insurance claim for their residence located at 3528 Player Drive, New Port Richey, Pasco County, FL 34655.

In reviewing the initial reports from the Pasco County Sheriff's Office, Your Affiant learned that these homeowners stated that PAUL DAVID VAUTOUR approached them at their home. They provided their homeowner's insurance information to him. The homeowners advised that VAUTOUR had used an iPad tablet to obtain their signatures, but they stated that they were unaware

that they were also signing an Assignment of Benefits at that time. Your Affiant learned that PAUL DAVID VAUTOUR had prepared a roofing estimate as part of this claim for a roof replacement in the amount of nineteen-thousand and seven-hundred and fifty dollars (\$19,750).

Your Affiant learned that two days later, on May 17, 2021, Harriet Brawner, received a phone call from her insurance company, Security First Insurance. Harriet Brawner was told that she had recently filed a claim for her roof. Harriet Brawner stated that she had not placed a phone call to her insurance company to report a claim for her roof. Harriet Brawner was also made aware that the date of loss reported was April 11, 2021, and that the caller stated that Mrs. Brawner's husband had found roof shingles in their yard. Your Affiant learned that the Brawners' became concerned about possible fraud during this phone call, and decided to cancel their roofing contract with Castle Roofing.

As part of this investigation, Your Affiant reviewed the recorded claim phone call that was placed to Security First Insurance on May 15, 2021. The unknown female caller identifies herself as the homeowner Harriet Brawner by providing her name, insurance policy number, and home address. Brawner verified that the female on the recorded call was not her and that she had not called in this claim. Your Affiant learned that the phone call

had been placed from phone number (813) 464-1344. Through investigative resources, Your Affiant learned this phone number was confirmed to be associated with KIANA MARIA VAUTOUR, PAUL DAVID VAUTOUR'S daughter. In addition, KIANA MARIA VAUTOUR had previously used this phone number to report other claims Your Affiant had reviewed.

Your Affiant also reviewed a recorded interview between Pasco County Sheriff's Office Detective Gerard Lipinski and PAUL DAVID VAUTOUR that took place on August 26, 2021 as part of this investigation. Your Affiant learned that PAUL DAVID VAUTOUR confirmed that a homeowner's insurance claim for the Brawners' roof was filed after he met with them at their home. PAUL DAVID VAUTOUR stated that his daughter, KIANA, made the call to Security First Insurance to report this claim. PAUL DAVID VAUTOUR explained that he directed her to do so, and that his daughter assisted him with administrative duties for Castle Roofing.

Your Affiant learned that PAUL DAVID VAUTOUR also confirmed that he was on the weekly payroll of Castle Roofing for insurance purposes, but that his sales commissions were paid to him as an independent salesperson. PAUL DAVID VAUTOUR stated that he has never been trained as a roofer. PAUL DAVID VAUTOUR told the detective that he got into the business as a salesperson four years ago with Castle Roofing. PAUL DAVID

VAUTOUR claimed his expertise is having the insurance knowledge to know which conditions a roof would need in order for an insurance company to pay for it. PAUL DAVID VAUTOUR stated that is why he deals primarily with older roofs because aging of a roof is a condition favorable to total replacement.

PAUL DAVID VAUTOUR further stated that the Brawners' had a twenty-year-old composite shingle roof which was a roofer's "wet dream" because that type of roof is easily approved by insurance companies, and that he was disappointed when the Brawners' had cancelled his contract because it would have been an "instant approval." PAUL DAVID VAUTOUR stated that he had been able to obtain 20 to 30 roof approvals in the area by using the same storm date of April 11, 2021. When asked how he had arrived at the estimate for this particular claim, PAUL DAVID VAUTOUR explained that just by experience he knew that their roof was about \$14,000 or \$15,000 but he wanted to "overshoot his estimate."

The Brawners' roof was later inspected by Southern Safe Construction on May 19, 2021. It was determined that it would cost one-thousand six-hundred and fifty dollars (\$1,650.00) to replace less than thirty (30) wind creased shingles. The photos taken during the inspection revealed that there were no shingles missing from the Brawner's roof.

Other Interviews

On January 11, 2022, Castle Roofing employees Robert Clayton Lusk, Sr. ("Senior") and Robert "Bo" Clayton Lusk, Jr. ("Junior") voluntarily agreed to a law enforcement interview which was recorded. Nothing was promised or offered to them prior to this interview.

Senior stated that he was an account manager with Castle Roofing, explaining that as being in "sales." Senior stated he began working for the business in March of 2019. Senior explained that another Castle Roofing employee, Vice President of Sales PAUL VAUTOUR, had trained him regarding roof inspections. Senior explained that the owner of the roofing business, James Lathrop, was not interested in "cash roofs" or roofs that were replaced without insurance. Senior stated he was paid on collections and that he received 10% or 7% of those payments from James Lathrop.

Junior stated that PAUL VAUTOUR had mentored Junior on how to inspect roofs, including bending shingles. Junior stated that PAUL VAUTOUR wanted claims to be designated as "storm damage" because deductibles were lower for the homeowner. Senior stated that Castle Employee Andrew Case also worked with Vautour "chalking roofs," and employee Kiana Vautour dealt with the claims process. Junior stated that he was also trained to pose as homeowners on insurance claim phone calls and that he had done so in the past. Junior also admitted that he had bent shingles on 15 or more roofs and was

told by Vautour that it would not get "bought" unless he bent the shingles.

Junior and Senior both stated they felt pressure from Lathrop to make sales, and that they would not be paid unless sales were made. Junior and Senior both agreed that roofs were damaged so that the roofs would be covered through insurance claims.

Conclusion

Based on the information outlined above, it is the belief of Your Affiant that probable cause exists that:

- (1) Between the dates of September 19, 2019 through October 20, 2020, **PAUL DAVID VAUTOUR** did engage in two or more white collar crimes to wit: Grand Theft (Fla. Stat 812.014), that had the same or similar intents, results, accomplices, victims or method of commission or were otherwise interrelated by distinguishing characteristics and were not isolated incidents, and in doing so did victimize the State of Florida, any state agency, any of the state's political subdivisions, or any agency of the state's political subdivisions, and thereby obtained or attempted to obtain \$50,000 or more, contrary to the White Collar Crime Victim Protection Act, Section 777.0844, Florida Statutes.

(2) On or between October 20, 2020 through October 28, 2020, **PAUL DAVID VAUTOUR and KIANA MARIA VAUTOUR** did knowingly and unlawfully obtain or use, or endeavor to obtain or use, the property of another, to-wit: U.S. Currency, of the value of \$20,000 or more but less than \$100,000, with intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or with intent to appropriate the property to his own use or to the use of any person not entitled thereto; contrary to Chapter 812.014 (2) (b)1, Florida Statutes.

(3) On or between January 30, 2020, through March 20, 2020, **PAUL DAVID VAUTOUR** did knowingly and unlawfully obtain or use, or endeavor to obtain or use, the property of another, to-wit: U.S. Currency, of the value of \$20,000 or more but less than \$100,000, with intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or with intent to appropriate the property to his own use or to the use of any person not entitled thereto; contrary to Chapter 812.014 (2) (b)1, Florida Statutes.

(4) On or between September 19, 2019 through September 21, 2019, **PAUL DAVID VAUTOUR** did knowingly and unlawfully obtain or use, or endeavor to obtain or use, the property of another, to-wit: U.S. Currency, of the value of \$20,000 or more but less than \$100,000, with intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or with intent to appropriate the property to his own use or to the use of any person not entitled thereto; contrary to Chapter 812.014 (2) (b)1, Florida Statutes.

(5) On or between October 13, 2019, through December 23, 2019, **PAUL DAVID VAUTOUR** did knowingly and unlawfully obtain or use, or endeavor to obtain or use, the property of another, to-wit: U.S. Currency, of the value of \$10,000 or more but less than \$20,000, with intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or with intent to appropriate the property to his own use or to the use of any person not entitled thereto; contrary to Chapter 812.014 (2) (c)3, Florida Statutes.

(6) On or between December 3, 2019 through December 12, 2019, **PAUL DAVID VAUTOUR** did knowingly and

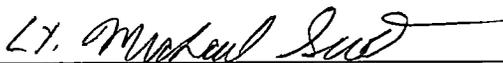
unlawfully obtain or use, or endeavor to obtain or use, the property of another, to-wit: U.S. Currency, of the value of \$10,000 or more but less than \$20,000, with intent to temporarily or permanently deprive Citizens Property Insurance Corporation of a right to the property or benefit therefrom, or with intent to appropriate the property to his own use or to the use of any person not entitled thereto; contrary to Chapter 812.014 (2) (c)3, Florida Statutes.

- (7) On or between May 15, 2021 through May 17, 2021, **PAUL DAVID VAUTOUR** and **KIANA MARIA VAUTOUR** did knowingly and unlawfully obtain or use, or endeavor to obtain or use, the property of another, to-wit: U.S. Currency, of the value of \$10,000 or more but less than \$20,000, with intent to temporarily or permanently deprive Security First Insurance of a right to the property or benefit therefrom, or with intent to appropriate the property to his own use or to the use of any person not entitled thereto; contrary to Chapter 812.014 (2) (c)3, Florida Statutes.

- (8) On or between May 15, 2021 through May 17, 2021, in the Sixth Judicial Circuit; to-wit: Pasco County, Florida, **PAUL DAVID VAUTOUR** and **KIANA MARIA VAUTOUR**,

did willfully and without authorization fraudulently use, or possess with intent to fraudulently use, personal identification information concerning an individual, HARRIET BRAUNER, without first obtaining HARRIET BRAUNER'S consent, and the pecuniary benefit, the value of the services received or the payment sought to be avoided, or the amount of the injury or fraud perpetrated was \$5,000 or more, contrary to Chapter 817.568 (2) (b) / 775.087, Florida Statutes, and against the peace and dignity of the State of Florida.

WHEREFORE, Your Affiant prays that an arrest warrant will be issued commanding all and singular, the Colonel of the Florida Division of Investigative and Forensic Services or any of his duly authorized Special Agents; all Sheriffs and Police Chiefs of the State of Florida or any of their duly authorized deputies or officers or any other duly authorized law enforcement officer of the State of Florida acting within their respective jurisdictions to arrest instanter **PAUL DAVID VAUTOUR**, further described hereinabove on the charges set forth herein and bring him before the Court so that he may be dealt with according to law.



Affiant
Lieutenant Michael Scott
Florida Department of Financial Services
Division of Investigative and Forensic Services
Bureau of Insurance Fraud

FINDING OF PROBABLE CAUSE

I, Chris H have reviewed this affidavit and do find there is probable cause to hold and bind over for trial the defendant named in this affidavit.

Chris H
JUDGE

11/29/23
DATE

ORIGINAL

Clerk of this Court is hereby directed to
ISSUE CAPIAS for arrest of Defendant

PAUL DAVID VAUTOUR

Defendant is to be admitted to Bail in the sum of
\$ 200,000 on Ct. 1, including surcharge
\$ 50,000 on Ct. 2, including surcharge
\$ 50,000 on Ct. 3, including surcharge
\$ 50,000 on Ct. 4, including surcharge
\$ 25,000 on Ct. 5, including surcharge
\$ 25,000 on Ct. 6, including surcharge
\$ 25,000 on Ct. 7, including surcharge
\$ 20,000 on Ct. 8, including surcharge

\$ _____ Total

Other conditions of release:

relinquish passport
to Clerk at it post bond
not with victim or his Brewer

Chris Helmer
Circuit Judge

PERSONAL DATA INFORMATION SHEET

ALL INFORMATION MUST BE PROVIDED BY THE INVESTIGATING OFFICER

**Note: Starred lines are required for computer warrant entries. *FCIC System (local) **NCIC System*

*Defendant's Full Name: Paul David Vautour				
*Alias:		*SSN: [REDACTED]		
		*SID: n/a		
Last Known Address: 1942 Muirfield Way, Oldsmar, FL 34677-1935				
Place of Employment: Citrus Roofing				
*DOB: 12/4/1973	*Sex: Male	*Race: White	Fingerprints Available:	No
**HT: 6'00	**WT: unk	**Hair: Black	**Eyes:	Brown
Other Features: (Beard, Marks, Scars, Tattoos)				
Per FL Rule 3.121 attach photo - SOPICS preferred!				
Originating Source of PHOTO: DAVID				
<input type="checkbox"/> SOPICS Docket #				
<input checked="" type="checkbox"/> FL DL # V360-684-73-444-0 DAVID Photo confirmed accurate by: Lt. Michael Scott				
<input type="checkbox"/> Other DL State # State:				
<input type="checkbox"/> Other Photo Source #				
<input type="checkbox"/> No Photo Available Explanation For No Photo:				
*AGENCY: DEPARTMENT OF FINANCIAL SERVICES, Bureau of Insurance Fraud			Offense Number: FRD19-1139	
*INVESTIGATING OFFICER: Lt. Michael Scott				

