



Name: **Jacqueline Bing**
AKAs: Jacqueline James, Jacqueline Johnson, Jacqueline Davis
DOB: [REDACTED]
Address: [REDACTED]
DL/ID: Florida # [REDACTED]
SSN: [REDACTED]
Physical: 5'4", 150 lbs., Black/Brown, B/F
Offense Date(s): January 3, 2020 to March 2020

EXHIBIT A
PROBABLE CAUSE AFFIDAVIT
IN SUPPORT OF CHARGING INFORMATION
Case No. MFC-20-00832

SYNOPSIS

An investigation conducted by the Florida Attorney General's Office Medicaid Fraud Control Unit (MFCU) revealed that **Jaqueline Bing** engaged in the exploitation of [REDACTED] a Medicaid recipient and disabled adult. **Bing** provided a room and related services (food, board, et cetera) to [REDACTED] beginning in approximately May 2019 and ending January 2, 2020, when **Bing** had [REDACTED]. **Bing** was listed as [REDACTED] payee for Social Security benefits and had kept access to his funds through March 2020, despite **Bing** being no longer entitled to [REDACTED] payments. In total, **Bing** exploited [REDACTED] by depriving him of at least \$2580.30 in disability benefit funds between January 3, 2020 through March 2020.

Due to [REDACTED] lack of access to his funds and because of his disability, social workers for [REDACTED] [REDACTED] were unable to secure proper placement for him in [REDACTED] subsequent to [REDACTED]. To date, [REDACTED] has remained [REDACTED] and had continued difficulty accessing his Social Security benefits.

DETAILS OF INVESTIGATION AND EVIDENCE:

Your Affiant, Robert Bolduc, being duly sworn, states: Your Affiant is a certified law enforcement officer by the State of Florida pursuant to Section 11B-27, Florida Administrative Code, relating to standards and training. Your Affiant is a Law Enforcement Investigator II assigned to the Orlando Bureau, Medicaid Fraud Control Unit (hereinafter referred to as “MFCU”), Office of the Attorney General (OAG), State of Florida. Your Affiant has been employed by the State of Florida as an investigator with the MFCU since January 24, 2020. Your Affiant has a Bachelor of Arts in Criminology from the University of Florida, a Graduate Certificate in the Modelling and Simulation of Behavioral Cybersecurity from the University of Central Florida, and a Master of Science in Digital Forensics from the University of Central Florida. Your Affiant attended and graduated in 2013 from the Basic Law Enforcement Academy at the Criminal Justice Institute at Valencia College in Orlando, Florida. Prior to the OAG/MFCU, Your Affiant was employed for over two years as a sworn United States Probation Officer in the Middle District of Florida, which included being a member of the district’s Digital Forensics Unit. Your Affiant has also served as a sworn Deputy Sheriff in Orange County, Florida for over four years in both a full-time and part-time capacity, and as a non-sworn Investigator, and later Investigator Supervisor, for the Florida Department of Health, Division of Medical Quality Assurance, Bureau of Enforcement, Investigative Services Unit for over two years. Your Affiant has completed numerous hours of advanced specialized courses including, but not limited to, interviews and interrogations, case preparation and court presentation, conspiracy investigations, financial crimes and fraud investigations, social media and open-source intelligence (OSINT), and digital forensic investigations, as well as many other in-service training sessions. Your Affiant has provided training to others in professional settings on the topics of healthcare crimes and fraud, narcotics investigations, and digital forensic investigations. Your Affiant has conducted and participated in regulatory and criminal investigations involving healthcare crimes, drug trafficking, child and elderly abuse and neglect, Medicare and Medicaid fraud, and other crimes against persons and

property. Your Affiant has prepared numerous probable cause affidavits during his career. Your Affiant understands the proper procedure for arrest and search warrant preparation and the requirements to have one issued.

DEFINITIONS

The **“Medicaid Fraud Control Unit” (“MFCU”)** exists to investigate alleged patient abuse, neglect or exploitation (PANE) of Medicaid recipients in health care facilities under the Medicaid program as outlined in F.S.S. Chapter 409.920(9). The MFCU is under the authority and supervision of the Office of the Attorney General of the State of Florida. **“Medicaid”** is the state and federal partnership that provides healthcare coverage for selected categories of people with low incomes. The purpose of the program is to provide medical assistance and health care coverage for categories of individuals whose income and resources are insufficient to meet the costs of their medical services. The Medicaid Program is authorized by Title XIX of the Social Security Act. In Florida, the Medicaid Program is authorized by Chapter 409, Florida State Statutes, and Chapter 59G, Florida Administrative Code.

“The Agency for Health Care Administration” (“AHCA”) is the State of Florida agency that oversees the Medicaid Program to provide medical services for persons who have been found eligible to receive **Medicaid benefits**. Medicaid eligibility in Florida is determined either by the state Department of Children and Families (DCF) or the Federal Social Security Administration for Supplemental Security Income recipients.

“Florida Medicaid Management Information System” (“FMMIS”) is used to enroll providers, process Medicaid claims, adjudicate claims, accept and process encounter claims for data collection, and reimburse providers. FMMIS allows the use of numerous electronic edits and audits to ensure that each submitted claim is from a valid Medicaid provider, for a valid Medicaid recipient, and for a valid Medicaid service.

“Florida Department of Health” (“DOH”) is the state licensing and regulatory agency for Medical and Health related services within Florida, and is the agency charged with protecting public health.

“Agency for Persons with Disabilities (APD)” is the State of Florida agency that works with local communities and private providers to support people who have developmental disabilities and their

families in living, learning, and working in their communities. APD also provides assistance in identifying the needs of people with developmental disabilities for supports and services so they can reach their full potential. APD serves more than 50,000 Floridians with developmental disabilities as defined in Chapter 393, Florida Statutes.

“Caregiver” is defined in § 825.101, Florida Statutes, as a person who has been entrusted with or has assumed responsibility for the care or the property of an elderly person or disabled adult. “Caregiver” includes, but is not limited to, relatives, court-appointed or voluntary guardians, adult household members, neighbors, health care providers, and employees and volunteers of facilities as defined in subsection (7).

“Disabled adult” is defined in § 825.101, Florida Statutes, as a person 18 years of age or older who suffers from a condition of physical or mental incapacitation due to a developmental disability, organic brain damage, or mental illness, or who has one or more physical or mental limitations that restrict the person’s ability to perform the normal activities of daily living.

The “Social Security Administration (SSA)” administers programs that provide benefits based on disability through Social Security disability insurance programs, including the Supplemental Security Income (SSI) program (title XVI of the Social Security Act). Title XVI provides SSI payments to disabled individuals (including children under age 18) who have limited income and resources. The Social Security Act and SSA's implementing regulations prescribe rules for deciding if an individual is "disabled." SSA's criteria for deciding disability may differ from the criteria applied in other government and private disability programs.

“Supplemental Security Income (SSI)” is a federal supplemental income program funded by general tax revenues (not Social Security taxes). It helps aged, blind, and disabled people who have limited income and resources by providing monthly cash payments to meet basic needs for food, clothing, and shelter. SSI payments are usually dated and delivered on the first day of the month for which they are due.

“Direct Express” is a debit card account, issued by Comerica Bank, used by the Social Security Administration to direct deposit benefit funds, such as Supplemental Security Income (SSI). According to the Social Security Administration’s website, “the Direct Express card is a debit card

you can use to access your benefits, and you don't need a bank account. With the Direct Express card program, we deposit your federal benefit payment directly into your card account.

COMPUTER DEFINITIONS

“Metadata” is a category of file information that contains the data that describes a file; it is data that describes the data. This category contains information, which can include but is not limited to where the file content is stored, how big the file is, the times and dates when the file was last read or written to, hardware and software (such as version numbers) data, authors, geolocation information, and access control data. This category of data does not contain the content of the file, and it may not contain the name of the file.

“DOCX” or “.docx” is a file extension for a document created by Microsoft Word or another word processing program, such as OpenOffice Writer or Apple Pages. Microsoft Word (version 2007 and above) is the primary software program used to open and edit DOCX files. DOCX files contain formatted text but may also include images, drawn objects, and other document elements. DOCX files are widely used in home, academic, and business environments for drafting letters, resumes, invitations, newsletters, and other documents.

“JPG” or “.jpg” stands for Joint Photographic Experts Group (JPEG) and is a common file type for digital images and a means of compressing an image.

A **“hash value”** is a value or checksum, generated by an algorithm, representing a specific data set. A hash value is analogous to a “fingerprint” of digital data.

“MD5 message-digest algorithm,” or **“MD5,”** is an algorithm which produces a 128-bit hash value and is widely used to verify file checksums. Tools such as Microsoft’s free File Checksum Integrity Verifier (FCIV) can generate the MD5 hash value of a file.

DEPARTMENT OF STATE DIVISION OF CORPORATIONS

The Florida Department of State, Division of Corporations shows that **Chosen Caring Hands, LLC** is a Florida Limited Liability Corporation registered with the Florida Department of State (document number L16000104591) as of May 27, 2016 and is listed as “active.” The business lists

a current principal and mailing address as [REDACTED]
[REDACTED] According to the online public database, **Jacqueline Bing** is the current registered agent and manager. It should be noted the original filing documents list **Bing's** maiden name, **Jacqueline James**.

FLORIDA DEPARTMENT OF HEALTH LICENSE INFORMATION

The Florida Department of Health (DOH) public website database lists **Bing** as a Certified Nursing Assistant ([REDACTED]). **Bing's** license status as of June 4, 2020 was "Clear/Active" and listed an issue date of May 21, 2010 and expiration date of May 31, 2022. The DOH site lists **Bing's** address of record as [REDACTED]

There is no public complaint or discipline on file.

AFFIANT DEPOSES AND SAYS THE ABOVE AND THE FOLLOWING:

This investigation was predicated upon information from a complaint filed with the [REDACTED] [REDACTED] alleging **Bing** was exploiting [REDACTED] a disabled/vulnerable adult. A preliminary investigation initiated on January 28, 2020, revealed that the MFCU had jurisdiction under Florida Statute 409.920(9). Investigative research and interviews were conducted. Upon review of the evidence, it was discovered **Bing financially exploited a disabled adult and Medicaid recipient, [REDACTED]** by remaining his social security representative payee and collecting his benefit payments from the Social Security Administration (SSA) from at least January 3, 2020 to March 2020, despite the fact that [REDACTED] no longer resided with **Bing**. **Bing's** criminal actions prevented [REDACTED] from accessing his social security benefits and obtaining needed placement in a protected setting.

Investigative research revealed the victim, [REDACTED] is diagnosed with [REDACTED] [REDACTED] lacks capacity, suffers from memory impairment, and requires assistance with his instrumental activities of daily living (IADLs). [REDACTED] and disability were later verified via records received from [REDACTED]
[REDACTED].

[REDACTED]

[REDACTED]

[REDACTED] qualifies as a disabled adult as defined by Florid Statute 825.101(3) as “a person 18 years of age or older who suffers from a condition of physical or mental incapacitation due to a developmental disability, organic brain damage, or mental illness or who has one or more physical or mental limitations that restrict the person’s ability to perform the normal activities of daily living.”

FMMIS RECORDS REVIEW

On February 17, 2020, LEI Bolduc and Analyst John DiMaria reviewed Florida Medicaid Management Information System (FMMIS) for **Bing** and [REDACTED]. **Bing** is listed as the payee for [REDACTED] SSA benefits, under address [REDACTED].

A provider ID for **Bing** was identified under [REDACTED], d/b/a Chosen Caring Hands, LLC. The Medicaid agreement effective date was listed at October 25, 2019. The address is listed as [REDACTED]. A review of claims for [REDACTED] did not reveal billing by the above provider ID.

TELEPHONIC INTERVIEW OF MEGHA VYAS

On February 17, 2020, LEI Bolduc made contact with Megha Vyas by phone. She stated that she is a social worker for [REDACTED]. She confirmed the allegation that **Jacqueline Bing** may be exploiting disabled adult [REDACTED]. Vyas stated **Bing** is the payee for [REDACTED] disability, and [REDACTED] hasn't had access to his money since **Bing** removed [REDACTED] from her home in approximately 2019. Vyas stated the case was assigned to her director, Risa Attermann, who could provide additional information. She could not provide specific dates or further information without referring to [REDACTED] and said Attermann would be able to assist LEI Bolduc further.

TELEPHONIC INTERVIEW OF RISA ATTERMANN

On February 19, 2020, LEI Bolduc made contact with Risa Attermann by phone. She stated that she is a social worker/director [REDACTED] who was assigned [REDACTED] case. [REDACTED] had three [REDACTED] to [REDACTED] in January 2020 and a previous [REDACTED] in April 2019. She confirmed [REDACTED] is a disabled vulnerable adult who, in her opinion, should be placed in [REDACTED]. Attermann was unable to determine his specific whereabouts or residence in 2019 and stated that the information she received was that he was removed from Bing's residence at [REDACTED], anywhere between June 2019 and January 2020. [REDACTED] entered the [REDACTED] on January 10, 2020 and was discharged February 7, 2020. During this time, he had no access to his disability income or any funds, which prevented him from [REDACTED].

Upon discharge, [REDACTED] was referred to the Rescue Mission homeless shelter in Orlando, Florida. She could not provide any contact information or whereabouts for [REDACTED] or any collateral contacts.

Attermann had difficulty reaching **Bing** in attempt to identify the status of [REDACTED] funds. She attempted to place [REDACTED] at No Placement Like Home, Inc. with "Samual." Samual advised Attermann on February 4, 2020, that she was able to contact **Bing**, and **Bing** agreed to transfer payee status to her and make his first payment for placement at No Placement Like Home, Inc.; however, Attermann stated **Bing** never did so.

Attermann was subsequently able to make contact with **Bing**. **Bing** confirmed that she had “evicted” [REDACTED] and he was not able to return. **Bing** did not provide a timeframe for his eviction. **Bing** told Attermann to just send [REDACTED] to a shelter, because that is what she has done in the past and [REDACTED] knows where the shelters are. **Bing** stated she was no longer the payee for [REDACTED] and that [REDACTED] still owes her money.

Attermann reiterated that for at least January and partially February 2020, [REDACTED] has not had access to his funds, resulting in his inability to obtain placement and subsequent referral to a homeless shelter. Attermann has serious concerns that **Bing** financially exploited [REDACTED] from January 2020 at least early February 2020, and that she may have been exploiting him prior to then as well.

INTERVIEW OF JACQUELINE BING

On February 21, 2020, LEI Bolduc and LEI George Rosado made unannounced contact with **Bing** in person at her residence, located at [REDACTED]. After identifying themselves as law enforcement investigators, **Bing** spoke to the LEIs. The following are excerpts from **Bing**'s recorded (clandestine) interview:

Bing stated that she is a licensed Certified Nursing Assistant (CNA). She is the owner of Chosen Caring Hands, LLC, where she “works for APD now” and goes to see patients at their own home. **Bing** advised she is a Medicaid provider. **Bing** stated that she does not run a licensed facility and that she and her husband just “rents rooms” out at their residence. **Bing** denied anyone staying with them presently. [REDACTED] rented such a room from her beginning in April or May of 2019.

Bing offered [REDACTED] to stay with her. She stated that he couldn't afford to stay at her home, and he had no money, but she allowed [REDACTED] to stay because he doesn't have any parents and that she felt bad for him. **Bing** described herself as a “nurturer” and that she “looked at him like a son.”

According to **Bing**, another provider was his payee at the time, “Toney.” She was supposed to pay **Bing** for [REDACTED] first month of rent, but **Bing** stated Toney refused. **Bing** stated this information was provided to an investigator, “Rivera,” with [REDACTED]. **Bing** said, “even though I have a compassionate heart, I want to get paid for my services.” **Bing** drafted a contract for [REDACTED] to sign stating that if he ever got money, he would pay **Bing**. She said this

never happened. Unprompted, **Bing** stated, “I never have tried to do anything to harm him [REDACTED] or keep money I’m not supposed to have.”

Regarding the services she provided [REDACTED] **Bing** said she fed him three meals a day and snacks and stated she “cared for him like he was my son.” **Bing** stated she would pick him up and take him to his appointments whenever he would [REDACTED]. She said she did not charge him for such transportation. **Bing** stated that she managed [REDACTED] finances for him and took his funds as payment. **Bing** said [REDACTED] has no bank account.

Regarding [REDACTED] [REDACTED] she stated that [REDACTED] “pretends he can’t do anything” and “malingers.” **Bing** stated [REDACTED] wouldn’t be able to accurately depict anything to LEI Bolduc regarding his time with **Bing**. She said [REDACTED] needs “a lot of help,” stating “he needs more services than I can provide.” Later during the interview, **Bing** stated [REDACTED] needs placement in a skilled nursing facility [REDACTED].

Despite describing his [REDACTED] as “very limited,” and stating that he cannot control his finances, cannot cook for himself, needed assistance with bathing, and that he will always need a representative payee, **Bing** drafted a contract and lease for [REDACTED] to stay with her, which he signed. This contract included \$750 a month for rent and a stipulation that he would be charged each day he leaves his belongings at the residence upon moving out. LEI Bolduc inquired if **Bing** thought that contract was something that [REDACTED] was capable of understanding. She replied, “I read it to him... and he said he understood.” Further, **Bing** said [REDACTED] understood the contract because he’s “very clever.”

Bing insisted that [REDACTED] resided with her consistently through January 2020. She said [REDACTED] was placed [REDACTED] every month or two, and she first stated that he never stayed [REDACTED] “but three days” and that “if anybody say different, they’re lying.” The most recent time she had [REDACTED] was the “last straw.” She said [REDACTED] became violent with her husband, a military veteran, and [REDACTED] was trying to grab a knife from the kitchen. **Bing** had to call 911. **Bing** stated her husband “had to take him [REDACTED] down and hold him” until police got there. **Bing** said [REDACTED] “was gonna kill me.” This occurred in January 2020, which is when **Bing** stated [REDACTED] was last at the residence.

Later during the interview, **Bing** stated that [REDACTED] never stayed a month away from her residence. She reiterated the longest amount of time [REDACTED] was away from the residence in medical care was three days, never longer. In a conflicting statement, **Bing** said that he may have been gone as long as a week before, but “that’s a stretch.” Regardless, she said she stayed in touch with him during any time he was [REDACTED]

Bing stated [REDACTED] had a case manager with Staywell, Rashidah Brookins, who visited him every month at the residence and could corroborate her statements about the services she provided and time he was at the residence. **Bing** said she “did over what he was paying me,” referring to services provided to [REDACTED]

Bing stated that she is still registered as [REDACTED] payee, despite him not residing with her since January 2020. She said she was “supposed to go Monday” to correct this but she “hasn’t had the time” because her daughter is getting married on Saturday. LEI Bolduc inquired what it entails to have her removed as the payee, and she said she just needs to call or go to Social Security Administration office and tell them to remove it and that she’s “done it too many times with clients.” **Bing** became [REDACTED] representative payee because, as she stated, she wanted to get paid for the services she was providing him. She said she didn’t get enough money to pay for the services she provided to [REDACTED], and that “we don’t need his money to survive.”

Regarding [REDACTED] January 2020 social security check, **Bing** said she took this check to pay for his services because he was there in January. When [REDACTED] February 2020 social security check came, **Bing** said she took the check to pay for “arrears” and to “recoup” the money [REDACTED] owed her from the first month he moved in and could not pay her. In addition, [REDACTED] left his clothes at the residence and **Bing** reiterated that she will charge [REDACTED] for each day he leaves them at her residence pursuant to his rent contract with **Bing**. She had them removed from the house and they are under a swing in her yard. She was unsure of the exact storage fee, but believed it was \$100 a day. She said she charges that much so people do not leave behind their belongings.

Regarding the Social Security Administration (SSA), **Bing** made statements such as the SSA “don’t make these people pay the money back, don’t catch it” and that sometimes SSA puts people on repayment plans. **Bing** said it is “very hard to turn money back into social security, they’ll tell you ‘keep it’” and reiterated that she kept [REDACTED] checks because it was owed to her. **Bing** told a

story of when an unknown individual she knew had kept six months of social security checks belonging to someone else, and when **Bing** reported to SSA, nothing happened to the individual.

Bing also made conflicting statements such as she was not going to keep [REDACTED] checks anymore, and that he doesn't owe her anything else, however she will continue to charge him each day his belongings remain at her residence. Regarding still being listed as [REDACTED] payee, **Bing** said she isn't trying to keep that status and she just didn't have time to remove it. She stated she would provide documentation to LEI Bolduc to show it had been removed, in addition to providing a copy of [REDACTED] contract and lease. LEI Bolduc provided **Bing** with his contact information. **Bing** stated she doesn't do "this" for the money and that her and her husband both work and they have a good income. **Bing** stated that people like her are the ones getting hurt in instances like this. **Bing** stated that she just got her Medicaid number and that these investigations can affect "innocent people" such as herself. Also, she is no longer going to help people like [REDACTED] anymore. At one point, when LEI Bolduc reiterated that he was with the Medicaid Fraud Control Unit, **Bing** exclaimed "you cannot affect my number, I just got it!" referring to her Medicaid provider number.

It should be noted that during the contact with **Bing** at her residence, LEI Bolduc and LEI Rosado were led into a room that **Bing** stated was [REDACTED] room, which appeared devoid of any of his belongings, and an adjacent room that appeared to be **Bing**'s office. The office was in a room in the northwest corner of the home. LEIs observed a computer desk with binders on top of the hutch, one labelled "APD Billing," and a red-colored laptop computer on the desk. There were several boxes of files in plain view. When asked about possessing any records for [REDACTED] **Bing** produced a folder from the office's closet that contained records related to [REDACTED] and showed it to LEI Bolduc. It contained records such as patient and discharge information for [REDACTED] at various providers. **Bing** also opened an electronic document on her laptop that she stated was [REDACTED] lease, which LEI Bolduc briefly observed to contain the amount "\$750" and several signatures she indicated were [REDACTED] **Bing** also indicated that she had previously emailed DCF a copy of the document from her email address of record, [REDACTED]. LEI Bolduc observed **Bing**'s laptop logged into what appeared to be yahoo webmail service as she looked for the document.

TELEPHONE CALL FROM JACQUELINE BING

Between February 21, 2020 and February 24, 2020, LEI Bolduc received several calls from **Bing**. **Bing** stated she did not know why she was under investigation by the Medicaid Fraud Control Unit because [REDACTED] was not an APD client and she only ever provided him board. **Bing** stated she never billed Medicaid for services rendered to [REDACTED]. Bing told LEI Bolduc to “let him know he has things here and that its \$100 a day,” referring to [REDACTED] and his belongings. She agreed to provide LEI Bolduc a copy of [REDACTED] lease via email that she spoke about on February 21, 2020.

E-MAIL AND LEASE RECEIVED FROM JACQUELINE BING

On February 24, 2020, LEI Bolduc received an email from **Bing** [REDACTED] that had an attachment labelled “[REDACTED] lease (2).docx”. The metadata was inspected and revealed a “Last Modified” date and time of February 24, 2020, at 0738 hours, a “Created” date and time of February 17, 2020 at 0528 hours and a “Last Printed” date and time of August 19, 2019 at 1950 hours. The author is listed as “JACQUELINE JAMES” and the Last Modified By is listed as “Jacqueline James”.

Content of the file was reviewed in Microsoft Word and appears to be a lease agreement between **Bing** and [REDACTED] executed on March 15, 2019. There are two signatures on the document listed as “Lessee Initials,” presumably belonging to [REDACTED] but indicate the letters “NOS,” both inserted as image files and both in what appears to be different signature styles. The line “TOTAL RENTAL RATE DUE ON THE 3rd OF EACH MONTH” appears next to an inserted image of the number “750⁰⁰” handwritten.

Using Microsoft Word for Office 365, LEI Bolduc was able to validate that a .docx file that is created, printed, modified, and then saved as a new document will retain the earlier “Last Printed” date and time from the original file but have the later “Created” date and time of the new file contained in the metadata. This is consistent with the .docx file metadata received by **Bing**. The “(2)” suffix of the file name “[REDACTED] lease (2).docx” is consistent with a second copy of the file with the same name being created or edited and then saved in order to not overwrite the original file.

FOLLOW-UP RECORDS REVIEW

Upon interviewing **Bing**, further review of FMMIS and law enforcement reports related to [REDACTED] and **Bing** from March of 2019 to January of 2020 was conducted. It should be noted that investigative research throughout the course of investigation revealed that **Bing** has been married numerous times, and has used the last names of Johnson, James, and Davis.

FMMIS records for [REDACTED] indicated multiple occasions where [REDACTED] was receiving [REDACTED] [REDACTED] ranging from several days up to approximately 18 days (from May 30, 2019 to June 17, 2019). Providers of service were listed in multiple cities, including Orlando, Tampa, New Port Richey, and Winer Haven. These records conflict with **Bing's** statement that [REDACTED] was never gone from her residence more than three days. [REDACTED] spent a total of approximately 36 days at [REDACTED] between June and December 2019.

Police reports obtained from Winter Haven (Florida) Police Department (WHPD) and Polk County (Florida) Sheriff's Office (PCSO) revealed [REDACTED] approximately six times by the two agencies during the same time period, most occurring at or near **Bing's** residence on [REDACTED]. Of note, a WHPD report dated May 29, 2019 indicated that **Bing** contacted law enforcement to [REDACTED] and stated that [REDACTED] was no longer welcome to reside at her residence.

In addition, a WHPD report dated June 6, 2019, detailed family members of another adult with disabilities who resided with **Bing** at her "group home," located at [REDACTED]. [REDACTED] contacted law enforcement after becoming concerned that the relative was being exploited by **Bing** and held against their will. **Bing** was uncooperative with law enforcement and refused to provide any paperwork regarding the individual and denied law enforcement the ability to enter or inspect the residence. Family members responded to the scene and the individual was safely removed from the residence.

The following is a summary of relevant reports that create a timeline of [REDACTED] apparent whereabouts between March 2019 and January 2020.

On March 2, 2019, [REDACTED] by Polk County Sheriff's Office (PCSO) at [REDACTED] [REDACTED] where he was staying with an individual named Irene Toney.

A follow-up check on [REDACTED] was conducted by PCSO on March 20, 2019 at the above address, and [REDACTED] stated he was doing better.

On April 28, 2019, [REDACTED] PCSO at [REDACTED]. There are no details provided regarding who he was residing with there.

A follow-up check on [REDACTED] was conducted by PCSO on May 10, 2019, at [REDACTED]. [REDACTED] stated he was doing better but could not recall when [REDACTED]

On May 29, 2019, [REDACTED] by Winter Haven Police Department (WHPD). He reported living at the above address.

On June 15, 2019, WHPD attempted to conduct a follow-up with [REDACTED] however it was discovered that he [REDACTED]

Between June and December 2019, [REDACTED] by law enforcement at or near [REDACTED].

On January 2, 2020, at approximately 2147 hours, WHPD responded to [REDACTED]. A WHPD officer observed Harold Bing, Jr., (Jacqueline) Bing's husband, on top of [REDACTED] holding him down to the ground. Harold Bing stated that he got into an argument with [REDACTED] and [REDACTED] [REDACTED]

On January 9, 2020, PCSO responded to [REDACTED] in unincorporated Winter Haven, Florida. He was observed wearing "hospital clothes" with a medical ID bracelet. [REDACTED] told the PCSO Deputy Sheriff that he had [REDACTED] [REDACTED] about an hour prior. He could not inform the PCSO deputy of his address. [REDACTED]

On January 14, 2020, PCSO attempted to [REDACTED] [REDACTED]; however, Harold Bing, Jr. and (Jacqueline) Bing stated [REDACTED] no longer resided there.

SEARCH WARRANT EXECUTION OF BING'S RESIDENCE

On March 5, 2020, the Honorable Michelle Pincket, Circuit Court Judge in the Tenth Judicial Circuit of Florida, ordered a search warrant of [REDACTED], the residence of **Bing**.

On March 6, 2020, a team of MFCU law enforcement officers, along with a Winter Haven Police Department officer, executed a search warrant of **Bing's** residence, located at [REDACTED], with **Bing** present.

A total of five items were seized during the execution of the search warrant. Included in these items were assorted documents, a red HP laptop, serial number [REDACTED], and a black and white notebook containing Florida Identification Cards for [REDACTED] and [REDACTED] Florida Driver License for [REDACTED] and Social Security and Medicare identification cards for [REDACTED]. Prior to completing the search, Lt. Cronin and LEI Bolduc presented the above notebook containing identifications for individuals not at the residence and inquired as to why **Bing** possessed these documents, in addition to asking her password information for the laptop. The interaction was recorded covertly; the following statements are excerpts from the recording: **Bing** explained how she rented rooms to board "them," and "whenever they come, they can't keep up with their belongings... I keep their personal information."

Regarding [REDACTED] **Bing** stated that he stayed with her until he required a greater level of care than **Bing** could provide. **Bing** stated she does not know where [REDACTED]. At an unknown time, she took him to the [REDACTED] because he was "sick" and suffered from [REDACTED], where hospital staff advised **Bing**, he required more intensive care. [REDACTED] resided with **Bing** for approximately one year in 2019. **Bing** stated she was previously the payee for [REDACTED] SSA benefits.

Regarding [REDACTED] **Bing** stated that he was "someone my husband used to take care of," and after their marriage, (Jacqueline) **Bing** began to take care of him. [REDACTED] lived with **Bing** and her husband for approximately two years, and **Bing** stated she continues to "take care of him." [REDACTED] is now at a "transitional home" run by **Bing's** daughter, Nakesha Young. **Bing** stated she is currently the payee for [REDACTED] SSA benefits.

Bing advised all three were still alive, and she stated that she kept the identification documents because she did not know who to give them to., and that no one ever tried to get their identification documents so **Bing** “still keeps it on hand.”

REVIEW OF DOCUMENTS SEIZED DURING SEARCH WARRANT

Documents obtained from the search warrant executed at **Bing**'s residence were subsequently entered into evidence and digitally scanned for review while maintaining chain of custody. LEI Bolduc reviewed the seized documents.

Of note:

- Envelope #2, ([REDACTED] pdf, Page 137): A document titled “Comprehensive Discharge Care Plan” from [REDACTED] indicated [REDACTED] on May 7, 2019 to [REDACTED] and transportation was provided by WellCare. [REDACTED] and it was documented that “House Manager Keyena” would be making the appointment for [REDACTED]
- Envelope #2, ([REDACTED] pdf, Page 150): A SSA document titled “Important Information” dated May 8, 2019 and addressed to **Bing**, provided information to **Bing** regarding her request to be representative payee for [REDACTED]. Page 5 of 7 of the document stated (emphasis added):

You Must Notify The Social Security Administration Promptly If Any Of The Following Events Occur And Promptly Return Any Payment Of Which The Claimant Is Not Entitled:

- *the claimant or any member of the claimant's household dies (SSI eligibility ends with the month in which the claimant dies);*
- *the claimant's household changes (someone moves in/out of the place where the claimant lives);*
- *the claimant leaves the U.S. (the 50 states, the District of Columbia, and the Northern Mariana Islands) for 30 consecutive days or more;*
- *the claimant moves or otherwise changes the place where he/she actually lives;*
- *the claimant is admitted to a hospital, skilled nursing facility, nursing home, intermediate care facility, or other institution;*

- *the income of the claimant or anyone in the claimant's household changes (this includes income paid by an organization or employer, as well as monetary benefits from other sources);*
- *the resources of the claimant or anyone in the claimant's household changes;*
- *the claimant or anyone in the claimant's household marries;*
- *the marriage of the claimant or anyone in the claimant's household ends in divorce or annulment;*
- *the claimant separates from his/her spouse.*
- *the claimant is confined to jail, prison, penal institution or correctional facility;*
- *the claimant is confined to a public institution by court order in connection with a crime.*
- *the claimant has an unsatisfied felony warrant (or in jurisdictions that do not define crimes as felonies, a crime punishable by death or imprisonment exceeding 1 year) issued for his/her arrest;*
- *the claimant is violating a condition of probation or parole under State or Federal law;*

and Page 6 of 7 states (emphasis added):

Remember:

- ***payments must be used for the claimant's current needs or saved if not currently needed. (Savings are considered resources and may affect the claimant's eligibility to payment.);***
 - ***you may be held liable for repayment of any payments not used for the claimant's needs or of any overpayment that occurred due to your fault;***
 - ***you must account for benefits when so asked by the Social Security Administration. You will keep records of how benefits were spent so you can provide us with a correct accounting;***
 - ***to let us know as soon as you know you are unable to continue as representative payee or the claimant no longer needs a payee;***
 - ***you will be asked to help in periodically redetermining the claimant's eligibility for payment. You will need to keep evidence to help us with the redetermination (e.g. evidence of income and living arrangements).***
 - ***You may be required to obtain medical treatment for the claimant's disabling condition if he/she is eligible under the childhood disability provision.***
- Envelope #2, ([REDACTED] pdf, Page 157-166): A document titled “Comprehensive Discharge Care Plan,” [REDACTED] indicated [REDACTED] on May 30, 2019 [REDACTED] on June 12, 2019 (but signed on June 17, 2019) to [REDACTED]

[REDACTED]. “Jackie” is listed as [REDACTED] caregiver and provided phone number [REDACTED] (**Bing’s** phone number).

- Envelope #3, (Genoa Healthcare.pdf, Page 26): A document titled “Statement of Discharge” [REDACTED]. The document indicated [REDACTED] to the above location on August 7, 2019 and [REDACTED] August 13, 2019. His [REDACTED] address was [REDACTED]
[REDACTED]
- Envelope #2, (Misc. docs.pdf, Page 5-6): An SSA document titled “Notice of Change in Payment” dated December 1, 2019 and addressed to **Bing**, provided information to **Bing** as representative payee for [REDACTED]. The document provided his updated payment amount and reiterated similar reporting responsibilities as previously listed, notably that **Bing** is required to notify the SSA if [REDACTED] moves from his residence and if anyone moves into or out of the the residence.
- Envelope #2, (OneMain Financial.pdf): A document from OneMain Financial address to **Bing** regarding a new loan. The account number ends in [REDACTED] the loan amount was for \$23,421.00, the first payment amount was \$616.37, and the first payment was due by November 11, 2019.
- Envelope #2, (OneMain Financial.pdf): A Social Security Administration (SSA) document titled “Report of Confidential Social Security Benefit Information” by SSA employee “E. Bridges” stated, “Old payee Ms. Bing came into the local office to have her self-removed as payee on 02/25/2020 for [REDACTED]”
- Envelope #5: A paper notebook containing [REDACTED] Florida Identification Card, along with identification documents (Florida, Social Security, and Medicare IDs) and personally identifying information (PII) for several individuals.

PHONE CONTACT #1 WITH SSA OIG SPECIAL AGENT KAREEN FLAX

On March 6, 2020, spoke with Social Security Administration Office of Inspector General (SSA OIG) Special Agent (SA) Karen Flax, a sworn federal law enforcement officer, regarding the exploitation investigation of **Bing** and her payee status for [REDACTED]. SA Flax advised that SSA databases showed **Bing** is still listed as payee for [REDACTED]

LEI Bolduc advised that he had not yet received bank records for review from **Bing**, and that the account of record for **Bing** appeared to be Bank of America. LEI Bolduc told SA Flax how **Bing** stated she was receiving [REDACTED] social security checks monthly and depositing them into her account, and that she stated she had no bank account or other financial instruments belonging to [REDACTED]. SA Flax stated that this was not true, as her database indicated [REDACTED] benefits were being paid to Comerica Bank via a Direct Express debit card, and that his benefits would need to be accessed with the Direct Express debit card.

It should be noted that at no point during the execution of the search warrant at **Bing's** residence, did **Bing** ever present or mention the existence of a Direct Express debit card or account, and no Direct Express card was observed during the search.

REVIEW OF SSA "REPORT OF CONTACT" PROVIDED BY SA FLAX

On or about March 26, 2020, LEI Bolduc received an SSA "Report of Contact" document from SSA OIG SA Flax. The report stated that on March 9, 2020, **Bing** appeared at the Winter Haven SSA office, located at 1395 NW Havendale Boulevard, Winter Haven, Florida. **Bing** brought in \$600 of "conserved funds" for [REDACTED] and stated that [REDACTED] had past due expenses. Report stated [REDACTED] whereabouts were unknown and that he left **Bing's** "adult home in the middle of" January. The report stated that on March 16, 2020, a letter was mailed to **Bing** stating that she needed to return any funds that she conserved that were not used for [REDACTED].

The report stated **Bing** received retroactive payments for \$231.30 on November 12, 2019 and regularly monthly payments from January 2020 to March 2020, after [REDACTED] was no longer residing with her. Based on the above, the total amount **Bing** exploited [REDACTED] for was \$2580.30. According to the report, **Bing** still owes SSA \$1980.30.

PHONE CONTACT #2 WITH SSA OIG SPECIAL AGENT KAREEN FLAX

On April 17, 2020, LEI Bolduc spoke with SSA OIG Special Agent Flax by phone. LEI Bolduc requested assistance from SA Flax interpreting **Bing's** Direct Express account statement as there were multiple recipient deposits each month. SA Flax confirmed that the [REDACTED] benefits being deposited into **Bing's** account. SA Flax provided the following amounts of Social Security (SSA) and Supplemental Security Income (SSI) benefits to correlate with the Direct Express

account statement for **Bing**: SSI benefit deposit amounts [REDACTED] were \$693.90 in 2019 and \$783.00 in 2020.

SA Flax also stated that occasionally a following month's SSI benefit may be disbursed at the end of the preceding month, for example a February benefit may be deposited into the account in late January. **Bing** received [REDACTED] March 2020 benefit disbursement on February 28, 2020.

REVIEW OF BANK RECORDS FROM BANK OF AMERICA, COMERICA BANK

The MFCU issued subpoenas to Bank of America and Comerica Bank requesting bank records for **Bing** and [REDACTED]. The records were subsequently received, and a preliminary review was conducted by LEI Bolduc. No Direct Express bank account could be located in [REDACTED] name. **Bing** has two Bank of America accounts, account numbers ending in [REDACTED]. The account ending in [REDACTED] appeared inactive. **Bing** also has a Direct Express account, account number ending in [REDACTED]. The Direct Express account had two separate social security beneficiaries, in addition to [REDACTED] receiving benefit direct deposits monthly.

Regarding [REDACTED] benefits, [REDACTED] SSI funds were first deposited in **Bing's** Direct Express account on May 31, 2019 (SSI benefit for June 2019) and continued monthly until February 28, 2020 (SSI benefit for March 2020). On May 7, 2020, LEI Bolduc confirmed with SA Flax that [REDACTED] had received additional benefit payments of \$231.30 on November 14 and \$771.00 on November 29, 2019.

Bank records appeared to show a pattern of ATM cash withdrawals from Direct Express after [REDACTED] benefits had been direct deposited, followed by cash deposits in **Bing's** Bank of America account ending in [REDACTED].

In addition to ATM cash withdrawals, transactions in **Bing's** Direct Express account (where [REDACTED] benefits had been deposited) during the timeframe of May 2019 to March 2020 included mostly purchases at restaurants, grocery stores, clothing stores, women's beauty supplies/services, gas stations, office supplies/services (such as Staples office supply store, Hewlett-Packard ink, and Vista Print), and Amazon Prime subscription fees.

Other transactions of note:

- October 11, 2019: **Bing's** Bank of America account ending in [REDACTED] showed a \$6,200.92 loan deposit from OneMain Financial Group. In November 2019, January 2020, and April 2020, a total of \$1540.92 in payments were made to OneMain Financial Group from **Bing's** Direct Express account.
- Between June 1, 2019 and April 3, 2020, six payments were made to Pearl Holding Insurance totaling \$1350.17 from **Bing's** Direct Express account, within days of [REDACTED] benefit direct deposit.
- March 6, 2020: **Bing's** Bank of America account ending in [REDACTED] showed a \$603.00 ATM withdrawal in Winter Haven, Florida; this was the same day that the MFCU executed the search warrant of **Bing's** residence. On March 9, 2020, the SSA had reported that **Bing** had brought in \$600 of [REDACTED] "conserved funds."

EXAMINATION OF DOCUMENTS ON BING'S LAPTOP

On March 9, 2020, a forensic acquisition of **Bing's** laptop, a Hewlett-Packard, red in color, serial number [REDACTED], was performed by Investigator Brian Watson, a computer forensic examiner employed by Firebird AST. Numerous business records, under multiple business names, and documents were found on the device, including Medicaid provider applications and supporting documentation, Medicaid recipient personally identifying information (PII), Medicaid recipient and APD client records, leases and contracts, and forms. Investigator Watson provided LEI Bolduc files that had been acquired from **Bing's** laptop for further review

LEI Bolduc reviewed the files provided by Investigator Watson. Files relevant to the investigation were identified and are listed below. Microsoft File Checksum Integrity Verifier (FCIV) Version 2.05 was utilized to calculate the below MD5 hash values.

The following files are of particular note regarding [REDACTED]

File Name	MD5 Hash	Date Modified	Description
[REDACTED] lease (2).docx	e24917d850362113e167b3b1ac6e073f	02/24/2020	<ul style="list-style-type: none"> · MD5 hash matches file provided by Bing to LEI Bolduc via email. · Word count matches "[REDACTED] lease.docx"; however, file size and MD5 hash values do not match.

			<ul style="list-style-type: none"> Images of handwritten initials “NOS” and amount “\$750.00” inserted into the document.
█ lease.docx	d8257e8f76c45479d2774f2f025e03c7	02/17/2020	<ul style="list-style-type: none"> MD5 hash matches file provided by Bing to DCF.
2019-08-19_192901.pdf	c0935d7912ef4b198458f2b733e34ce9	08/19/2019	<ul style="list-style-type: none"> A two-page scanned document titled “Chosen Compassionate Transitional Home Leasing Contract”. Handwritten initials “NOS” and amount “\$750.00” visually match images contained inside “█ lease (2).docx” and “█ lease.docx”. The document has handwritten dates of August 7, 2019. The footer indicates pages 1 and 2 of 14.
2019 lease 2.pdf	209d9b925af0e5b8701753253af0495b	08/19/2019	<ul style="list-style-type: none"> A one-page scanned document that appears to be the signature page of a lease. The footer indicates it is page 14 of 14. Signed by Jacqueline Bing (Lessor/Landlord) and █ (Lessee/Tenant).
2019 transistional lease.docx	f1e1d6b9cf245d1033398e70d9ef1c14	08/19/2019	<ul style="list-style-type: none"> A three-page typed word document titled “Chosen Home Leasing Contract”. Images of initials and amount “\$750.00” have been inserted into the document and visually match images contained inside “█ lease (2).docx”

LEI Bolduc subsequently extracted .JPG image files from the above Word documents that appeared visually similar. The MD5 hash value was calculated for each image.

Parent File	Image #	MD5 Hash	Image Description
█ lease (2).docx	1	33a073756ff3101c5265cfd27789a651	Handwritten initials “NOS” (1 st variation)
█ lease (2).docx	2	bf19e83172dc6ce360c7b6036134d116	Handwritten amount “750.00”
█ lease (2).docx	3	b3abc3c2be7f5eb26aee4ea3203e692f	Handwritten initials “NOS” (2 nd variation)
2019 transistional lease.docx	1	33a073756ff3101c5265cfd27789a651	Handwritten initials “NOS” (1 st variation)
2019 transistional lease.docx	6	bf19e83172dc6ce360c7b6036134d116	Handwritten amount “750.00”
2019 transistional lease.docx	7	b3abc3c2be7f5eb26aee4ea3203e692f	Handwritten initials “NOS” (2 nd variation)

Summary of Digital Evidence

- It was determined that the “[REDACTED] lease (2).docx” file has an MD5 hash that matches the MD5 hash value of a file with the same name that **Bing** previously sent to LEI Bolduc via email on February 24, 2020.
- .JPG images of handwritten initials “NOS” (two variations) and handwritten amount “\$750.00” contained within “[REDACTED] lease (2).docx” had MD5 hash values that match the images inserted in “2019 transitional [sic] lease.docx” (NOS initials, \$750.00). These handwritten images also appear in “2019-08-19_192901.pdf,” however their hash values could not be calculated in a comparable manner as with the .docx files. It is unknown if this .pdf document is the original source of these handwritten images.
- The typed content and subject matter of “2019 transistional [sic]lease.docx” appears to match the content and subject matter of “2019 lease 2.pdf” and “2019-08-19_192901.pdf.” These documents appear to be a lease agreement between **Bing** and an individual named [REDACTED] [REDACTED] dated August 19, 2019.
- Neither “2019 transistional [sic] lease.docx” , nor “2019 lease 2.pdf”, nor “2019-08-19_192901.pdf” have any reference to or indication of relation to [REDACTED]

INTERVIEW OF DAWN ADAMS

On June 19, 2020, LEI Bolduc interviewed Dawn Adams by phone. She confirmed that she is a social worker with [REDACTED] and [REDACTED] is a client of hers. Adams stated that [REDACTED] has been [REDACTED] since he [REDACTED] [REDACTED] on February 7, 2020. Adams stated that [REDACTED] has had continued difficulty in correcting his recipient payee information with SSA, which has prevented him from obtaining [REDACTED]. Adams was hopeful [REDACTED] will have the issues corrected and he would [REDACTED] in July 2020.

REVIEW OF MEDICAL RECORDS FOR [REDACTED]

Medical records for [REDACTED] were requested and subsequently received from [REDACTED] [REDACTED]. Review of the records indicated that [REDACTED] [REDACTED] on January 16, 2020. [REDACTED] [REDACTED]

██████████ on January 27, 2020, where he ██████████ until February 7, 2020. On that date, ██████████ by the Orlando (Florida) Police Department. He was transported ██████████
██████████
██████████ has been in ██████████ in Orange County, Florida since February 7, 2020. Medical records indicate ██████████ residence as homeless in Orange County, Florida.

RECORDED INTERVIEW OF ██████████

On June 26, 2020, LEI Bolduc received a phone call from Dawn Adams with ██████████
██████████ She stated that she was currently with ██████████ and that he was willing to discuss the investigation. Both parties agreed for the conversation to be recorded. During portions of the interview, Adams assisted ██████████ with understanding the questions LEI Bolduc asked him. The following are excerpts from the recorded phone interview:

██████████ was able to verify his identity and birth date. ██████████ stated he remembered **Jacqueline Bing**, whom he referred to as “**Ms. Jackie**.” He could not remember when he lived with her, but thought it was about three to four years ago. He stated **Bing** was “ok, but not really kind of ok” because she would “try to put her hands on you if you don’t listen to what she was saying” and that she was “hard to get along with.” ██████████ stated that Bing never hurt him, however, ██████████ could not recall any agreements he made with **Bing** to reside with her, signing any papers with her, or giving her permission to take his social security funds. ██████████ stated he was unaware of his current social security benefit status and did not know **Bing** took his funds after January 2020. ██████████ could not recall the last time he spoke with **Bing**. He did recall the last day he lived with **Bing** that he had gotten into a fight with her husband, they called the police. ██████████ He stated it was night outside but could not remember when this occurred or even approximate how long ago this incident happened. ██████████ stated he was not allowed to return to live with **Bing** but could not articulate why. Regardless, ██████████ stated he never wanted to return to **Bing’s** residence and that he did not feel safe when he lived there.

Adams confirmed that ██████████ has resided in Orange County, Florida since approximately January 2020, and that he plans to remain in Orange County. Adams verified that her title with ██████████

She holds a master's degree in Counseling and is certified in the state of Virginia as a Qualified Mental Health Professional for Adults. She confirmed that she and [REDACTED] are still trying to resolve his social security issues, and that they have an interview scheduled with the SSA for his benefits. She advised that [REDACTED] will need to find a new payee and group home to reside in that has an onsite caregiver present for his needs.

LEI Bolduc read Adams the definition of "Disabled adult" found in Section 825.101, Florida Statutes. Adams agreed that, in her opinion, [REDACTED]. After the recording ended, but prior to the phone call ending, Adams stated that due to [REDACTED], he has poor memory and may not have accurately recalled details, dates, or times of the information he provided LEI Bolduc. Adams also stated that [REDACTED] may have also agreed with whatever is being said.

CONCLUSION

The MFCU investigation found that **Jacqueline Bing**, a Medicaid provider, exploited [REDACTED] a disabled adult and Medicaid recipient, by remaining his social security benefits payee from at least January 3, 2020 to March 2020, despite [REDACTED]. **Bing** exploited [REDACTED] for a total of at least \$2580.30, of which \$1980.30 still remains unreturned to the Social Security Administration. This criminal act has led to the continued difficulty in [REDACTED] accessing his Social Security benefits and obtaining secure residential placement in the community. Furthermore, when the MFCU questioned **Bing** about her payee status for [REDACTED] and possible exploitation during the course of the investigation, **Bing** perpetuated her fraudulent activity by providing false statements and a forged document in attempt to deceive the MFCU regarding her lease agreement with [REDACTED] and conceal her finances (existence of the Direct Express bank account).

SUMMARY OF CHARGES

Based on the MFCU investigation, including review of the documents obtained from the Social Security Administration, by subpoenas, and by a lawful search warrant, testimony from the witnesses, and the review of Medicaid billing data and medical records, it is the belief that Your Affiant has probable cause to believe and does believe that **JACQUELINE BING** committed the violations of **Count 1 – Exploitation of a Disabled Adult, Florida Statutes 825.103(1)(d) and**

825.103(3)(c), and **Count 2 – Scheme to Defraud, Florida Statute 817.034(4)(a)3**, by engaging in a systematic and ongoing course of conduct with the intent to exploit victim [REDACTED] a disabled adult, from January to March 2020, resulting in **BING** receiving and retaining unlawful payments totaling **\$2580.30**.

FURTHER AFFIANT SAYETH NOT

Affiant: Robert Bolduc
Law Enforcement Investigator II

Sworn to and subscribed before me this ____ day of _____, 2020

Orange County Circuit Court Judge