

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA**

IN RE: PROBABLE CAUSE AFFIDAVIT FOR:

- (A) NIEVES M. DELGADO
aka NIEVES ALVAREZ**
- (B) HORTENSIA I. ESCOTO**
- (C) WILLIAM ALVAREZ**
- (D) RICARDO ISIDRO ESCOTO**
- (E) LUIS DIAZ**
- (F) ZORAIDA BAYON**
- (G) MARIA ANGELICA PONCELEON**
- (H) BLANCA MARQUEZ**
- (I) MARY LUCEY**
- (J) EMELINA MARQUEZ**
- (K) JACQUELINE REIGOSA**
- (L) DINORAH MATEU**

MFCU CASE NO.: 05-03-0254

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

BEFORE ME, _____ Judge of the Circuit Court, in and for Palm Beach County, Florida, personally appeared LAW ENFORCEMENT INVESTIGATOR II WILLIAM SAMPSON of the Attorney General's Medicaid Fraud Control Unit, who being first duly sworn, deposes and says that he has reason to believe that certain laws of the State of Florida have been violated on or about September 2003 and continuing through and including October 2005, in particular: *Racketeering*, F.S. § 895.03(3), *Conspiracy to Commit Racketeering*, F.S. § 895.03(4), *Grand Theft*, F.S. § 812.014(1) and (2)(a), *Organized Scheme to Defraud*, F.S. § 817.034(4)(a)1, *Money Laundering*, F.S. § 896.101(3) and (5)(c), *Patient Brokering*, F.S. § 817.505(4), *Obtaining Mortgage by Fraud*, F.S. § 817.54, *Forgery*, F.S. § 831.01, and *Uttering Forged Checks*, F.S. § 831.09, and that the facts tending to establish probable cause are as follows:

Your Affiant has been employed as a Law Enforcement Investigator II with the Office of the Attorney General, Department of Legal Affairs, State of Florida, currently assigned to the Medicaid Fraud Control Unit (MFCU) since October 22, 2004. Prior to being with the MFCU, your Affiant was a police officer with the Boynton Beach Police Department for 3 years and a deputy sheriff with the Worcester County Sheriff's Office for 13 years. During this time your Affiant has been assigned as an Investigator in the Special Victims Unit and Gang Unit, Field Training Officer and Sergeant in the uniformed patrol division. Your Affiant has conducted and/or participated in all types of criminal investigations, including homicides, sexual assaults, robberies, burglaries, child abuse and fraud.

BACKGROUND

Medicaid is the state and federal partnership that provides health coverage for selected categories of people with low incomes. Its purpose is to improve the health of people who might otherwise go without medical care for themselves and their children. The Agency for Health Care Administration (AHCA) is the State of Florida Agency that oversees the Medicaid Program to provide medical services for indigent recipients. The MFCU exists

to investigate and uncover Medicaid fraud that occurs in the State of Florida. The MFCU may investigate any criminal violations discovered during the course of those investigations, pursuant to Florida Statutes §16.59 and § 409.920(8)(a). The MFCU is under the authority and supervision of the Office of the Attorney General of the State of Florida.

The Medicare program is a federal health insurance program for the elderly and disabled. The United States Department of Health and Human Services (“HHS”) is responsible for the administration of the Medicare program. The Centers for Medicare and Medicaid Services (“CMS”) is the component agency of HHS that administers and supervises the Medicare program. CMS has contracted with First Coast Service Options (“FCSO”) to receive, adjudicate, process and pay certain claims submitted to it by Medicare beneficiaries and providers of medical services in the state of Florida.

Part B of the Medicare program is a medical insurance program that pays providers and suppliers, with the exception of inpatient healthcare facilities, directly for goods and services. Claims processing and payment for Medicare Part B claims are done by FCSO located in Jacksonville, Florida. The claims submitted by the criminal enterprise described in this Probable Cause Affidavit were submitted electronically from Palm Beach County, Florida and resulted in payment to the enterprise from Jacksonville, Florida.

Belle Glade Family Health Group, Inc. (BGFH), was incorporated in Florida on January 22, 2001. HORTENSIA I. ESCOTO and NIEVES M. DELGADO were the original incorporators as well as the corporate President and Vice-President, respectively. They held these positions until May 24, 2005, when BGFH was transferred to DELGADO’s mother, DINORAH MATEU. BGFH is located at 15-A West Canal Street North, Belle Glade, Palm Beach County, Florida. An earlier investigation conducted by your Affiant of BGFH in reference to fraudulent billings to the Medicaid program resulted in the arrests of DELGADO, her husband WILLIAM ALVAREZ, HORTENSIA ESCOTO and her husband RICARDO ISIDRO ESCOTO on charges of Organized Scheme to Defraud, Money Laundering and Grand Theft.

INVESTIGATION

As part of the investigation, your Affiant reviewed Medicare billings, which indicated that Dr. Kenneth Rivera-Kolb and Dr. Salomon Levin were the providing physicians at BGFH between October 2003 and September 2005. Thereafter, your Affiant interviewed numerous Medicare beneficiaries, who were billed for services, to include HIV infusions, rendered by Dr. Rivera-Kolb and Dr. Salomon Levin from BGFH. The consensus of recipients interviewed stated they were recruited to go to BGFH for HIV treatments. The beneficiaries would be paid \$25.00 per visit and would receive treatments three times per week for a six week period. A majority of the beneficiaries reported receiving one shot in their upper arm which they believed to be a vitamin shot.

Your Affiant's investigation determined that between October 1, 2004 and September 30, 2005, BGFH fraudulently billed the Medicare program approximately **\$6.6 million**. Dr. Levin was interviewed and stated he did not take part in the HIV portion of BGFH clinic, nor did he treat HIV patients. Notwithstanding, BGFH fraudulently billed Medicare approximately **\$2.75 million** under Dr. Levin's provider number. In addition, BGFH fraudulently billed Medicare approximately **\$3.85 million** under Dr. Rivera-Kolb's provider number. Of the approximately \$6.6 million billed by BGFH to Medicare for services allegedly provided to Medicare beneficiaries, approximately 90 percent of that amount was attributed to eight (8) different procedure codes, which are used for infusion medications. According to records obtained, BGFH purchased *less than two (2) percent* of the medication necessary to support the quantity billed to Medicare for these alleged infusion treatments.

Your Affiant interviewed DELGADO and HORTENSIA ESCOTO and confirmed that they are the co-owners of BGFH. Interviews also revealed that DELGADO does almost all the billing at BGFH and HORTENSIA ESCOTO is responsible for all the accounting. Medicare reimbursements are electronically transferred to BGFH's bank account to which DELGADO, ALVAREZ, HORTENSIA ESCOTO and RICARDO ESCOTO are the only authorized signatories.

Your Affiant obtained a sworn statement from MARIA PONCELEON, who stated she was introduced to ALVAREZ and DELGADO by ZORAIDA BAYON. Together they decided to work at BGFH and were offered a percentage of BGFH's business. PONCELEON stated

the patients were provided by EMELINA MARQUEZ and her sister BLANCA MARQUEZ. The MARQUEZ sisters obtained the patients through different local drivers to include MARY LUCEY and Judy Wilson.

The patients would be brought to BGFH, at which time they would be seen by Dr. Rivera-Kolb who would evaluate the patients and order blood work, which would be sent to a lab to be tested for HIV. After the results of the blood test were received, Dr. Rivera-Kolb would see the patient again and prescribe a plan of treatment. The patients would then be seen at BGFH on Monday, Wednesday and Friday to receive treatments. BGFH would average approximately 12 patients per day. All the patients would go there Monday, Wednesday and Friday for a four week period and treatments would all be the same. All the patients would be re-evaluated after the four weeks and then would repeat the cycle again.

PONCELEON stated she worked as a phlebotomist at BGFH from approximately November 2004 through July 2005. PONCELEON stated that during this time, of the 12 patients who were treated each day, at most three received the actual HIV infusion treatments, while the others would only receive a vitamin shot. Dr. Rivera-Kolb prescribed the infusions, however BAYON was tasked with giving the actual injections and on most occasions only gave the patients a vitamin shot. BAYON is *not* a licensed physician in the United States, but allegedly she was a doctor in Cuba and Venezuela. BAYON would then fraudulently complete the charts stating that all the patients received the infusions for billing purposes.

PONCELEON stated the patients were being compensated for coming to BGFH. PONCELEON observed HORTENSIA ESCOTO place cash into an envelope, which was then handed to the MARQUEZ sisters, who would then hand the envelopes to the drivers, which would pay the drivers and the patients.

PONCELEON stated after the bills (charts) were filled out by BAYON, they would be given to JACQUELINE REIGOSA, DELGADO's sister, who was responsible for doing some of the billing. PONCELEON heard on one occasion REIGOSA stating to DELGADO that they were committing too much fraud and should stop. PONCELEON stated that although REIGOSA knew what they were doing was wrong, she did what DELGADO told her to do.

PONCELEON stated she received approximately \$400,000 in checks issued to her by HORTENSIA ESCOTO during the time she worked at BGFH. PONCELEON was instructed by DELGADO to open a fraudulent company because it would be better to pay her through a company than directly to her person. PONCELEON admits that she did in fact open a company which did not exist for any other reason than to launder money. Checks written to this bogus company were issued by HORTENSIA ESCOTO. PONCELEON further admitted to your Affiant that BGFH was a fraudulent, money making company. PONCELEON stated that when she went to work at BGFH, she knew they were committing fraud. PONCELEON stated she did not stop the illegal activities at BGFH due to the fact the money was so good and they did not believe they would be caught.

Your Affiant obtained a sworn statement from Dulce Abreu, a pharmacy owner, who stated she was approached by RICARDO ESCOTO and ALVAREZ to purchase AIDS medication for BGFH. Abreu was offered an extra 5% above the retail cost of said medications to provide same to BGFH. Abreu stated she only provided approximately \$30,000 worth of medication to BGFH. In your Affiant's experience, one purpose of purchasing nominal amounts of medications is for criminal enterprises to be able to obtain invoices which will stand up to cursory inspection by administrative regulators or investigators.

Your Affiant obtained a sworn statement from MARY LUCEY reference her association with BGFH. LUCEY stated EMELINA MARQUEZ offered her a position driving patients to BGFH. EMELINA MARQUEZ agreed to pay LUCEY \$100 per patient of which \$25 of that money was to be paid to the patient. The HIV patients would be brought to BGFH three times per week. On the first day, the patient would have their blood drawn. If the patient tested positive, LUCEY would be notified to start bringing the patient in for the three times a week treatments.

Your Affiant showed LUCEY Florida Department of State, Division of Corporations forms for various companies. LUCEY acknowledged the signatures on the corporations were hers and that she signed same. She also stated the corporations did not exist nor did they provide any services. LUCEY advised your Affiant that she signed paperwork for

numerous companies, as well as numerous blank checks at the request of EMELINA MARQUEZ.

LUCEY was shown copies of checks which she admitted were signed by her, however, she states they were signed when the checks were blank at the request of BLANCA MARQUEZ. LUCEY stated she recalled opening a Wachovia bank account in Miami at the request of the MARQUEZ sisters. LUCEY was shown numerous checks from different accounts, which she stated she signed, however she did not receive any money from them nor did she endorse them. LUCEY did not receive any checks from BGFH for any of these companies, nor were any services provided for same. On one occasion, the MARQUEZ sisters took LUCEY to a bank in Miami to cash a \$9000 check. LUCEY cashed the check, which she gave entirely to BLANCA MARQUEZ. They all went to dinner after, at which time BLANCA MARQUEZ turned the money over to an unknown male.

LUCEY recalled she drove approximately five or six patients to BGFH. The MARQUEZ sisters would pay her and the money was wrapped in a paper towel. LUCEY stated she was aware how paying patients was illegal. She had been questioned in another investigation reference paying patients and was fully aware it was illegal, which is why LUCEY and the MARQUEZ sisters referred to the payments as "lunch money." LUCEY stated that at one point she voiced her concerns to BLANCA and EMELINA MARQUEZ about continuing to pay patients, but was told by them not to worry. LUCEY admits that she was advised by some of the patients that they were receiving vitamin shots. LUCEY stated she was aware BGFH was billing for large amounts of money and knew that vitamin shots were inexpensive.

Your Affiant interviewed Judy Mae Wilson who stated that in July 2004, she was introduced by LUCEY to the MARQUEZ sisters at which time she began working for them. Her job was to recruit and transport HIV patients to BGFH. Wilson recruited 10-12 patients for BGFH, which she would transport to the clinic for a 4-6 week treatment, three times per week.

Wilson would be paid \$25 by the MARQUEZ sisters, to pay each patient per visit. If the patient attended all three weekly visits they would be compensated an extra \$25. Wilson would transport the patients to BGHF and after all the patients were treated each

day, the MARQUEZ sisters would give Wilson an envelope containing \$25 cash for each patient, which Wilson would in turn distribute. Wilson would then be compensated between \$200 and \$500 per day. Wilson worked for the MARQUEZ sisters at BGFH from approximately October 2004 through August 2005. Wilson stated she did not deal with any other people at BGFH as the MARQUEZ sisters were the individuals from BGFH tasked with paying her.

Wilson advised that she was informed by some of her patients how they were only receiving the HIV treatments on one day, a vitamin shot on another and a different treatment on the third day each week. Wilson stated there were a few patients, who did not go for treatments three times every week, some only attended one or two weekly.

Your Affiant interviewed JACQUELINE REIGOSA, who stated she had worked at BGFH for the past one and a half years. REIGOSA stated she was responsible for billing and general help. REIGOSA stated only her and her sister DELGADO did the billing. REIGOSA stated she was responsible for approximately 60% of the billing, while DELGADO performed 40% of the billing. REIGOSA was asked about the infusion clinic portion of the center, which she stated she was familiar with and which she also billed for. REIGOSA stated she was offered the position by DELGADO and was paid \$700 per week for her services.

Your Affiant interviewed Mario Martinez, who stated he was familiar with BGFH and that his sister, HORTENSIA ESCOTO, and brother-in-law, RICARDO ESCOTO, were part owners of the facility. He advised that in late 2004, BGFH began making a lot of money. Martinez stated he received a cash payment of over \$4,000 dollars from his sister, which she stated she cashed at a check cashing store. Martinez stated his sister was doing so well at her clinic she just wanted to give some of her profits to him. Martinez stated he had questions as to whether or not the money the clinic was making was legitimate, but he never questioned his sister directly.

This investigator showed Martinez three checks issued by BGFH and signed by his sister HORTENSIA ESCOTO, for a total of \$9504.64, which were cashed at a check cashing store. Martinez stated he only received cash from one of the checks for approximately \$4000 and that he had never gone to a check cashing store. Martinez also

stated the signatures on the back of the checks were *not* his.

It should be noted that in 2005, the MFCU conducted a search warrant at BGFH. Shortly thereafter, Martinez was issued five checks for over \$22,500. The checks were given to him by HORTENSIA ESCOTO and endorsed by DINORAH MATEU. On May 24, 2005, ownership of BGFH was transferred to MATEU, DELGADO's mother. Between May 2005 and October 2005, MATEU became a signatory of the BGFH account and was responsible for issuing over **\$373,000** in checks, which included payments to fraudulent corporations for the intent of laundering said money as well as payments to other conspirators of the corrupt organization. MATEU also issued herself three checks in the amount of \$5,500 and two checks made out to "cash" for \$5,669, which were cashed and endorsed by a fraudulent corporation.

Subpoenas were issued reference to accounts used by BGFH and its' affiliates. A pattern was revealed showing numerous checks were being issued by BGFH to different corporations allegedly located throughout south Florida. Said checks were being cashed at London Check Cashing, Inc. (London), located in Miami-Dade county, Florida. A check was conducted through the Florida Department of State, Division of Corporations, which revealed that some of the companies did indeed exist. However, said companies were contacted and they all advised that they do not cash their checks at a check cashing store.

Several companies that were issued checks by BGFH which were cashed at London could not be verified through the Division of Corporations. Your Affiant conducted site checks of the alleged business locations of these companies and found them to be fraudulent. Based in part on the information obtained, your Affiant served a subpoena to the owner of London, LUIS DIAZ, seeking numerous customer files for London accounts.

A review of those customer files revealed two files which contained phony articles of incorporation for bogus companies, along with other fraudulent documents. Your Affiant was able to locate and interview the two individuals who, according to London's customer files, were the presidents of the two bogus companies. Both individuals stated that they had never heard of the bogus companies, had never heard of BGFH, and had never cashed a check at London. Notwithstanding, bank records show checks being cashed at London, which were issued by BGFH to these bogus companies and endorsed by

HORTENSIA ESCOTO.

A review of another of London's customer files revealed a fraudulent drivers license purporting to depict the real owner of a legitimate company. Your Affiant located and interviewed the real owner of the company who advised that she has never cashed a check at London. She did advise that she had sold BGFH medical equipment in the past and was familiar with DELGADO and ALVAREZ. Notwithstanding, bank records show checks issued by BGFH, as well as another company owned by ALVAREZ and another company owned by DELGADO, being cashed at London by the fraudulent individual.

A review of six other customer files further revealed a pattern of checks being cashed at London for bogus companies with fraudulent documents. In one instance, corporate documents were allegedly executed while the individual purporting to sign them was in the custody of the Florida Department of Corrections. Notwithstanding, checks were cashed at London, which were issued by BGFH to this bogus company and endorsed by HORTENSIA ESCOTO. It should be noted in the bottom left corner of two of the checks the name "Ricardo" is written and on one of the checks an "R" is written, which DIAZ advised was written by him after contact was made with RICARDO ESCOTO to authorize said check to be cashed.

Two other bogus companies with fraudulent documents likewise cashed checks at London, which were issued by BGFH and endorsed by HORTENSIA ESCOTO, with the name "Ricardo" or the letter "R" written in the lower left corner, which was written after contact was made with RICARDO ESCOTO to authorize said check to be cashed.

This investigator interviewed LUIS DIAZ owner of London. DIAZ admitted that he had cashed numerous checks issued by BGFH to various corporations. DIAZ advised your Affiant that all the subject corporations were referred to him by ALVAREZ. DIAZ advised that he is familiar with ALVAREZ, DELGADO, RICARDO ESCOTO and HORTENSIA ESCOTO, because they have all cashed numerous checks at London.

DIAZ admitted that he believed ALVAREZ had been involved with fraud based on the amount of money he cashed at London on a regular basis. DIAZ further admitted that he only cashes checks and does not concern himself with where the money comes from. DIAZ stated that the large majority of his customers were from medical corporations and

construction companies. DIAZ stated he believed the reason medical corporations would use check cashing stores was for fraudulent practices.

DIAZ advised your Affiant how on numerous checks, which were cashed at London and issued by BGFH or other companies operated by ALVAREZ, a "W", "R" or "Ricardo" was written on the lower left side of the check. DIAZ advised that he would make said notation, after telephoning either ALVAREZ for "W" or RICARDO ESCOTO for "R" and "Ricardo" for authorization to cash said checks. DIAZ stated ALVAREZ and RICARDO ESCOTO had requested they be notified by telephone to authorize the cashing of said checks by London.

Additionally BGFH issued checks, which were endorsed by HORTENSIA ESCOTO and made payable to herself, DELGADO, ALVAREZ, PONCELEON, BLANCA MARQUEZ, EMELINA MARQUEZ, Mario Martinez and RICARDO ESCOTO. Said checks were cashed by DIAZ and in many cases the initials "R" and "W" appear in the same manner described above.

In this manner, between September 1, 2003, and March 25, 2005, over **\$443,000** was laundered by BGFH and DIAZ. DIAZ further admitted to your Affiant that DIAZ was in the process of opening a medical clinic with ALVAREZ.

On March 25, 2005, BLANCA MARQUEZ applied for and obtained a mortgage in the sum of \$380,691.00 plus interest. A review of the loan file revealed copies of two checks written by HORTENSIA ESCOTO on the BGFH account. These checks were both in the amount of \$3,900.00 and were written to BLANCA MARQUEZ. Across the top of these checks was a header line indicating they were faxed from BGFH on March 18, 2005 at 2:50pm. A cross-check of these items against subpoenaed documents relating to the aforementioned BGFH account, revealed that in fact, said checks were not written to BLANCA MARQUEZ, but rather to different individuals and in different denominations than purported in the mortgage loan file.

CONCLUSION

Based on the totality of the circumstances, your Affiant believes he has probable cause to arrest the following people for the charges listed below:

- (A) **Nieves Delgado:** (1) Racketeering - predicate acts consisting of Grand Theft, Money Laundering, Wire Fraud, Medicaid Fraud; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree, (6) Patient Brokering;
- (B) **Hortensia Escoto:** (1) Racketeering - predicate acts consisting of Grand Theft, Money Laundering, Medicaid Fraud, Wire Fraud, Forgery; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree, (6) Forgery, (7) Uttering Forged Checks, (8) Obtaining a Mortgage by False Representation, (9) Patient Brokering;
- (C) **William Alvarez:** (1) Racketeering - predicate acts consisting of Grand Theft, Medicaid Fraud, Money Laundering; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree, (6) Uttering Forged Checks, (7) Patient Brokering;
- (D) **Ricardo Escoto:** (1) Racketeering - predicate acts consisting of Grand Theft, Medicaid Fraud, Money Laundering; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree, (6) Uttering Forged Checks, (7) Patient Brokering;
- (E) **Luis Diaz:** (1) Racketeering - predicate acts consisting of Grand Theft, Money Laundering, Medicaid Fraud, Forgery, Wire Fraud; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree;
- (F) **Zoraida Bayon:** (1) Racketeering - predicate acts consisting of Grand Theft, Money Laundering, Wire Fraud; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree;

- (G) Maria Ponceleon:** (1) Racketeering - predicate acts consisting of Grand Theft, Money Laundering, Wire Fraud; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree;
- (H) Blanca Marquez:** (1) Racketeering - predicate acts consisting of Grand Theft, Money Laundering, Medicaid Fraud, Wire Fraud, Forgery; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree, (6) Uttering Forged Checks, (7) Obtaining a Mortgage by False Representation, (8) Patient Brokering;
- (I) Mary Lucey:** (1) Racketeering - predicate acts consisting of Grand Theft, Money Laundering; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree, (6) Patient Brokering;
- (J) Emelina Marquez:** (1) Racketeering - predicate acts consisting of Grand Theft, Money Laundering, Medicaid Fraud, Wire Fraud; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree, (6) Patient Brokering;
- (K) Jacqueline Reigosa:** (1) Racketeering - predicate acts consisting of Grand Theft, Medicaid Fraud, Wire Fraud; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud; and
- (L) Dinorah Mateu:** (1) Racketeering - predicate acts consisting of Grand Theft, Money Laundering, Medicaid Fraud, Wire Fraud; (2) Conspiring to Commit Racketeering - same predicate acts, (3) Grand Theft in the First Degree, (4) Organized Scheme to Defraud, (5) Money Laundering in the First Degree.

WHEREFORE, your Affiant prays that Arrest Warrants be issued commanding the Sheriffs of the State of Florida, all and singular, their Deputies, the Commissioner of the

Florida Department of Law Enforcement, any of his duly constituted agents, the Attorney General's Director of Medicaid Fraud and his duly appointed Law Enforcement Investigators and all Florida police officers with the proper and necessary assistance, to arrest **NIEVES M. DELGADO, HORTENSIA I. ESCOTO, WILLIAM ALVAREZ, RICARDO ISIDRO ESCOTO, LUIS DIAZ, ZORAIDA BAYON, MARIA PONCELEON, BLANCA MARQUEZ, MARY LUCEY, EMELINA MARQUEZ, JACQUELINE REIGOSA** and **DINORAH MATEU**.

LEI II WILLIAM SAMPSON, AFFIANT

Sworn to and subscribed before me this ____ day of _____, 2007.

CIRCUIT JUDGE IN AND FOR PALM BEACH COUNTY