

263901

In the County Court Leon County, Florida

STATE OF FLORIDA

vs.

Emily Royster

COMPLAINT

988 Washington Lane Greensburg LA 70441

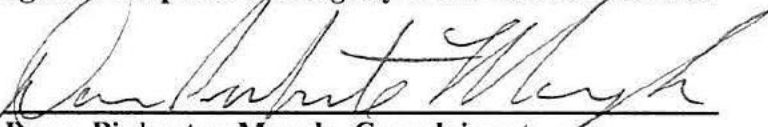
Warrant# 2020 CF1502A
Agency Case # MFC-19-07512
Officer I.D.# 1275
Charge Exploitation of Elderly over \$10k
FDLE Reference # 7695
Degree of Charge 2nd degree Felony
Statute No. 825.103(3)(b)
[REDACTED] Sex F
Race B Hgt 5'05"
Wgt 220 Hair BRN
Eyes BRN SSN [REDACTED]
DL# [REDACTED]

IN THE NAME AND BY THE AUTHORITY OF THE STATE
OF FLORIDA:

Before me, the undersigned authority, personally appear by Law Enforcement Investigator Dawn Pinkerton Marple, who, first being duly sworn says that on or around February 19, 2019 through September 6, 2019, in Leon County, Florida, the aforesaid defendant,

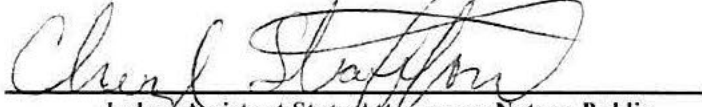
knowingly obtained or used the funds, assets, or property of [REDACTED], an elderly person or disabled adult, which had a value of \$10,000 or more, with the intent to temporarily or permanently deprive [REDACTED] of the use, benefit, or possession of the funds, assets, or property, or to benefit someone other than [REDACTED], while standing in a position of trust and confidence with [REDACTED], in violation of §825.103(1)(a) and § 825.103(3)(b), Florida Statutes.

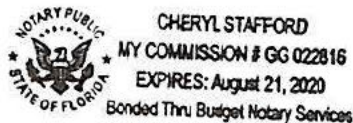
contrary to the statute, rule regulation or other provision of law in such case made and provided, and against the peace and dignity of the State of Florida.


Dawn Pinkerton Marple, Complainant

Office of the Attorney General, Medicaid Fraud Control Unit, 107 W. Gaines St., Tallahassee, FL 32399
Address

Sworn to and subscribed before me this 16 day of June 2020.


Judge, Assistant State Attorney or Notary Public



JUN 16 2020 11:36 AM
TALLAHASSEE, FL 32399

SYMPOSIUM

The following articles are included in this special issue of the Journal. The authors are listed in the order in which they appear in the symposium.

The first article, by Dr. [Name], discusses the importance of [Topic]. The second article, by Dr. [Name], focuses on the role of [Topic]. The third article, by Dr. [Name], examines the impact of [Topic]. The fourth article, by Dr. [Name], explores the challenges of [Topic]. The fifth article, by Dr. [Name], provides a comprehensive review of [Topic].

The sixth article, by Dr. [Name], discusses the latest research in [Topic]. The seventh article, by Dr. [Name], highlights the clinical applications of [Topic]. The eighth article, by Dr. [Name], addresses the ethical considerations of [Topic]. The ninth article, by Dr. [Name], offers a perspective on the future of [Topic].

The tenth article, by Dr. [Name], provides a detailed analysis of [Topic]. The eleventh article, by Dr. [Name], discusses the implications of [Topic]. The twelfth article, by Dr. [Name], examines the effectiveness of [Topic]. The thirteenth article, by Dr. [Name], explores the potential of [Topic].

The fourteenth article, by Dr. [Name], discusses the current state of [Topic]. The fifteenth article, by Dr. [Name], highlights the need for [Topic]. The sixteenth article, by Dr. [Name], provides a critical review of [Topic]. The seventeenth article, by Dr. [Name], offers a new perspective on [Topic].

The eighteenth article, by Dr. [Name], discusses the importance of [Topic]. The nineteenth article, by Dr. [Name], focuses on the role of [Topic]. The twentieth article, by Dr. [Name], examines the impact of [Topic]. The twenty-first article, by Dr. [Name], explores the challenges of [Topic].

In the County Court Leon County, Florida

203901

Warrant# 2020CF1562A
 Agency Case # MFC-19-07512
 Officer I.D.# 1275
 Charge Exploitation of Elderly over \$10k
 FDLE Reference # 7695
 Degree of Charge 2nd degree Felony
 Statute No. 825.103(3)(b)
 DOB [REDACTED] Sex F
 Race B Hgt 5'05"
 Wgt 220 Hair BRN
 Eyes BRN SSN [REDACTED]
 DL # [REDACTED]

STATE OF FLORIDA

vs.

Emily Royster

WARRANT

988 Washington Lane
Greensburg LA 70441

IN THE NAME AND BY THE AUTHORITY OF THE
STATE OF FLORIDA:

TO ALL AND SINGULAR THE SHERIFFS OF THE STATE OF FLORIDA:

Before me, the undersigned authority, personally appear by Law Enforcement Investigator Dawn Pinkerton Marple, who, first being duly sworn says that on or around February 19, 2019 through September 6, 2019, in Leon County, Florida, the aforesaid defendant,

knowingly obtained or used the funds, assets, or property of [REDACTED], an elderly person or disabled adult, which had a value of \$10,000 or more, with the intent to temporarily or permanently deprive [REDACTED] of the use, benefit, or possession of the funds, assets, or property, or to benefit someone other than [REDACTED], while standing in a position of trust and confidence with [REDACTED], in violation of §825.103(1)(a) and § 825.103(3)(b), Florida Statutes.

THESE ARE, THEREFORE, to command you to arrest instanter the aforesaid defendant and bring him or her before me to be dealt with according to law.

Given under my hand and seal this 16th day of June 2020.

County/Circuit Court Judge

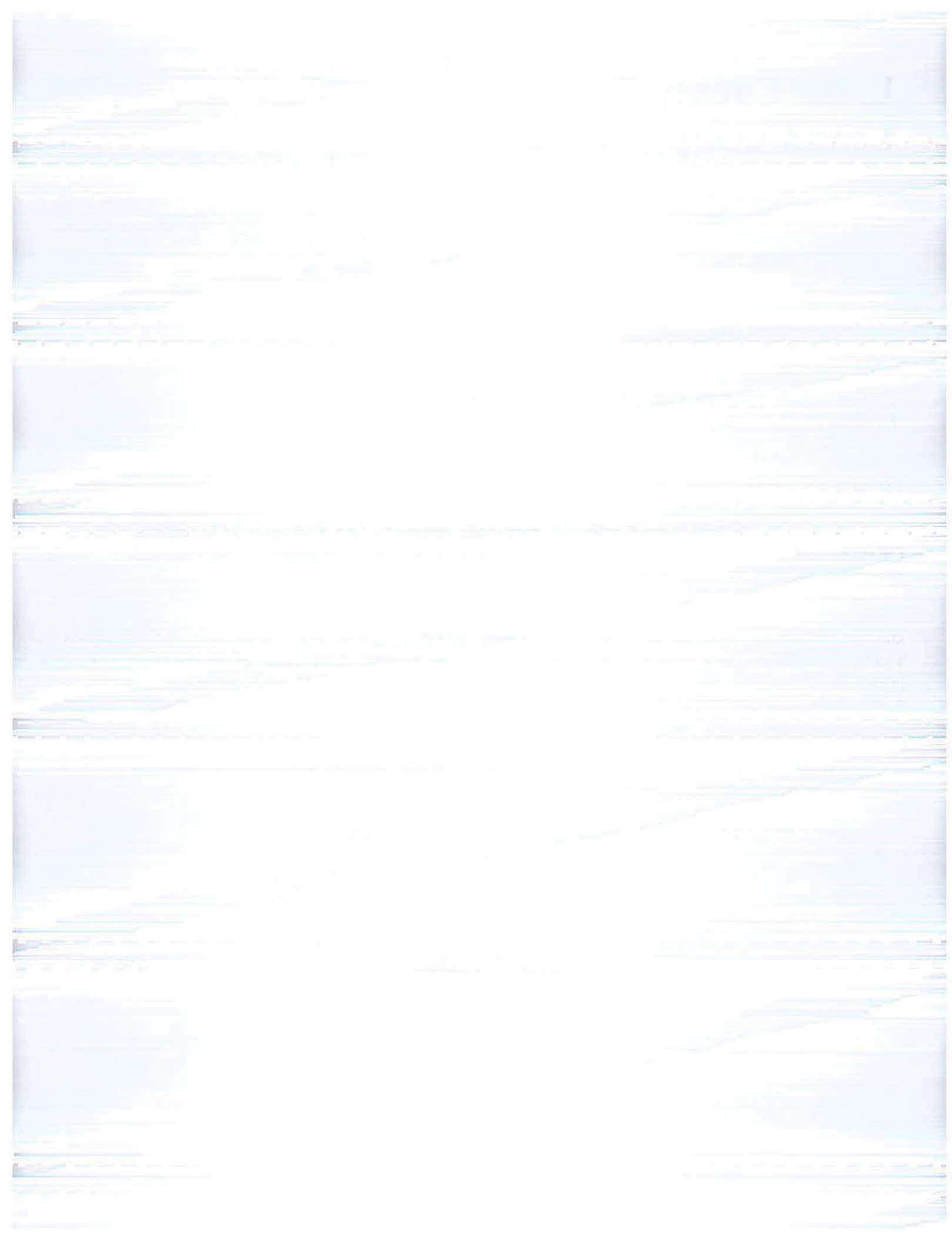
Leon County

(SEAL)

WARRANT

Hand \$10,000
New or witnesses

2020 JUN 16 AM 11:36



203901

2020CF1562A

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF LEON

2020 JUN 15 11:36
MFCU AGENCY
CASE # MFC-19-07512

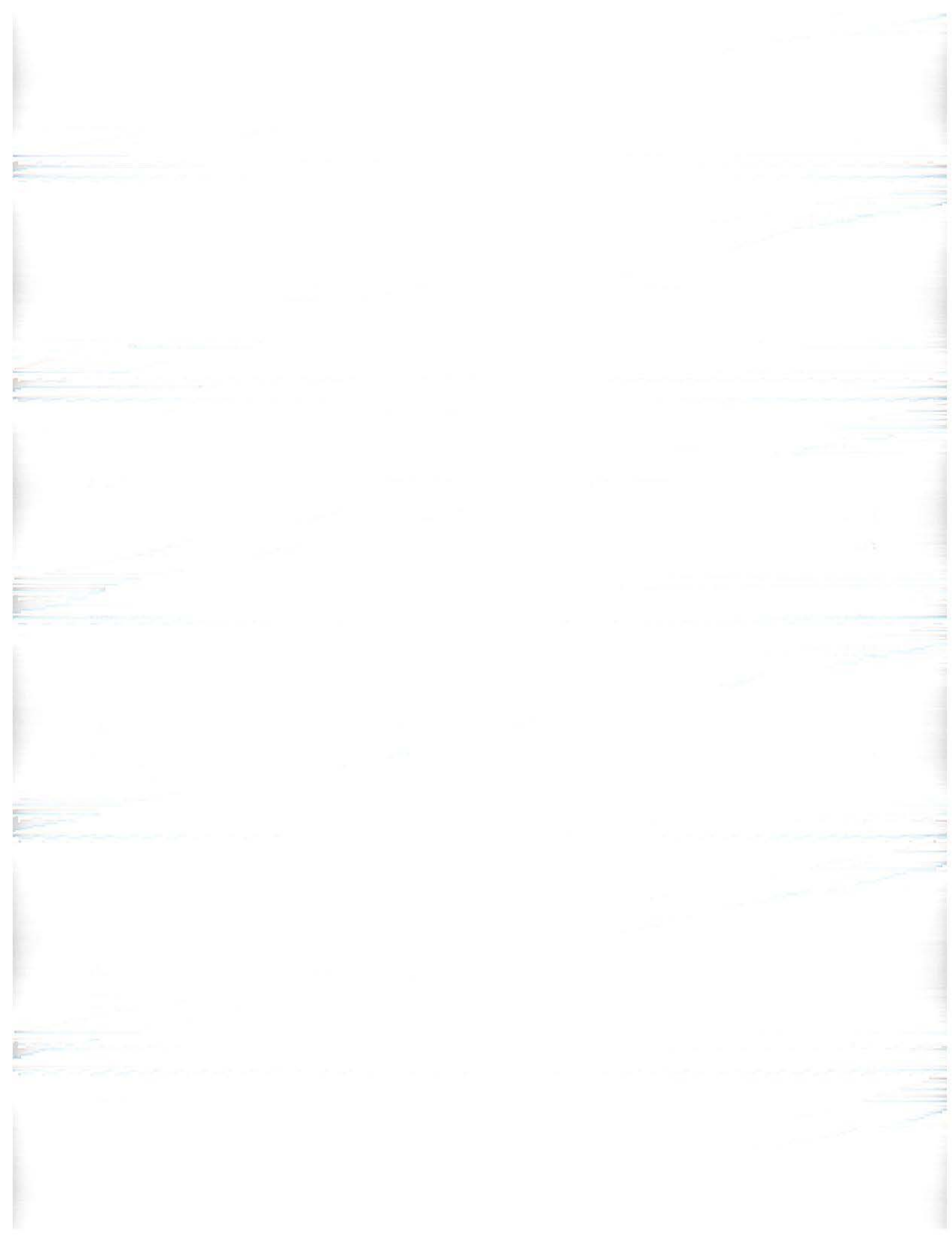
AFFIDAVIT IN SUPPORT OF AN
ARREST WARRANT FOR EMILY ROYSTER

BEFORE ME, Monique Richardson the undersigned Circuit Court/Acting Circuit Court Judge of the Second Judicial Circuit of Florida, personally appeared Dawn Pinkerton Marple, a Law Enforcement Investigator with the Florida Attorney General's Medicaid Fraud Control Unit, who being by me first duly sworn, deposes and further states as follows:

Your AFFIANT, Dawn Pinkerton Marple, has been employed as a law enforcement investigator with the Medicaid Fraud Control Unit (MFCU), a department within the Attorney General's Office, since March 28, 2011. Prior to that, your AFFIANT was employed by the Miami Dade County Sheriff's Office where your AFFIANT served as a deputy sheriff for a period of three years. During those three years, your AFFIANT investigated crimes concerning persons and property. Your AFFIANT has received specialized training in the investigation of abuse, neglect, and exploitation of the elderly.

The Medicaid Fraud Control Unit (hereinafter referred to as "MFCU") exists to investigate Medicaid fraud occurring in the State of Florida. The MFCU operates under the authority and supervision of the Florida Attorney General's Office. The MFCU is authorized to investigate the alleged abuse of the Medicaid program, in coordination with the Agency for Health Care Administration ("AHCA"), pursuant to 42 U.S.C. §1396b(q) and §409.920(9), Florida Statutes. The MFCU may investigate any criminal violations discovered during the course of those investigations, as provided by §16.59, Florida Statutes.

Your AFFIANT further states that the facts and reliable evidence supporting this affidavit and establishing probable cause to believe that on or about the dates of February 19, 2019 to September 6, 2019, Emily Royster, a black female, date of birth [REDACTED], last known address of 988 Washington Ln., Greensburg LA 70441, did commit, one (1) count of Exploitation of an elderly



person or disabled adult; \$10,000 or more, but less than \$50,000, within Leon County and in violation of §825.103(3)(a) and §825.103(3)(b), Florida Statutes.

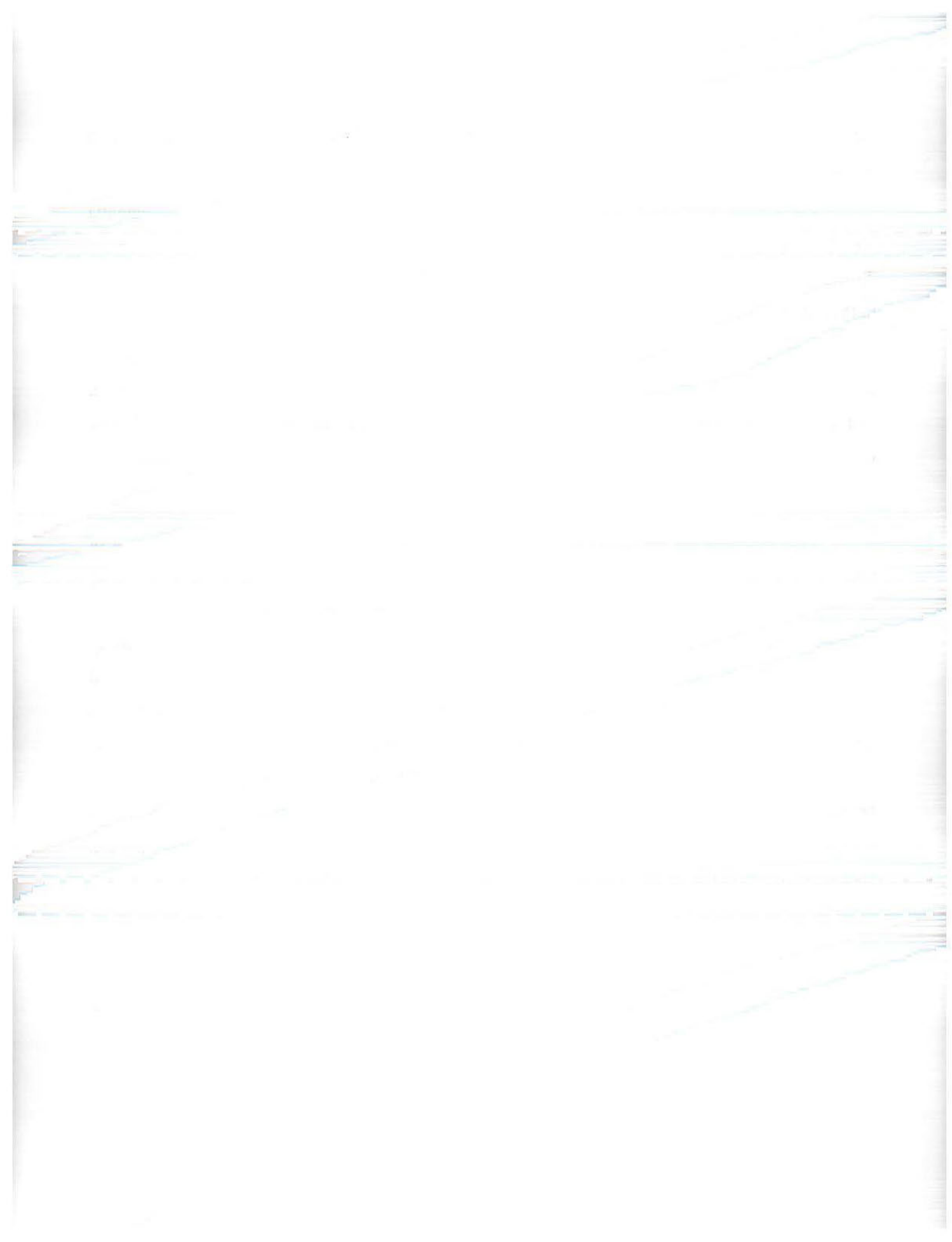
The victim, [REDACTED]¹ is an elderly adult, DOB 07/15/1939, and a disabled adult due to [REDACTED]. As of 6/27/2019, [REDACTED] became a resident of [REDACTED], located at [REDACTED]. Prior to that, [REDACTED] was residing in [REDACTED].

[REDACTED] was admitted into [REDACTED] with the following diagnosis; [REDACTED]. This information was obtained from the admission record provided by [REDACTED]. [REDACTED]'s primary care physician is Robert Rowland.

INVESTIGATION

This investigation was predicated on a complaint received from the Florida Department of Children and Families, Adult Protective Services, ("DCF/APS"). The report alleges [REDACTED]. The bill at the nursing home is unpaid and there is not enough money in the account to pay the bill. Emily Royster removed money from [REDACTED]'s account using a mobile application, Zelle, to transfer money to herself. Zelle is a United States-based digital payment network owned by Early Warning Services, a private financial services company owned by the banks Bank of America, BB&T, Capital One, JPMorgan Chase, PNC Bank, US Bank, Citibank, and Wells Fargo. Zelle describes itself as "an easy way to send money directly between almost any U.S. bank accounts typically within minutes. With just an email address or mobile phone number, you can quickly, safely and easily send and receive money with more people, regardless of where they bank." (<https://www.zellepay.com/support/what-is-zelle>)

¹ *The name of the Medicaid recipients have been reduced to initials to avoid the disclosure of confidential information pursuant to, inter alia, Federal HIPAA regulations and Section 409.920(9)(f), Florida Statutes.

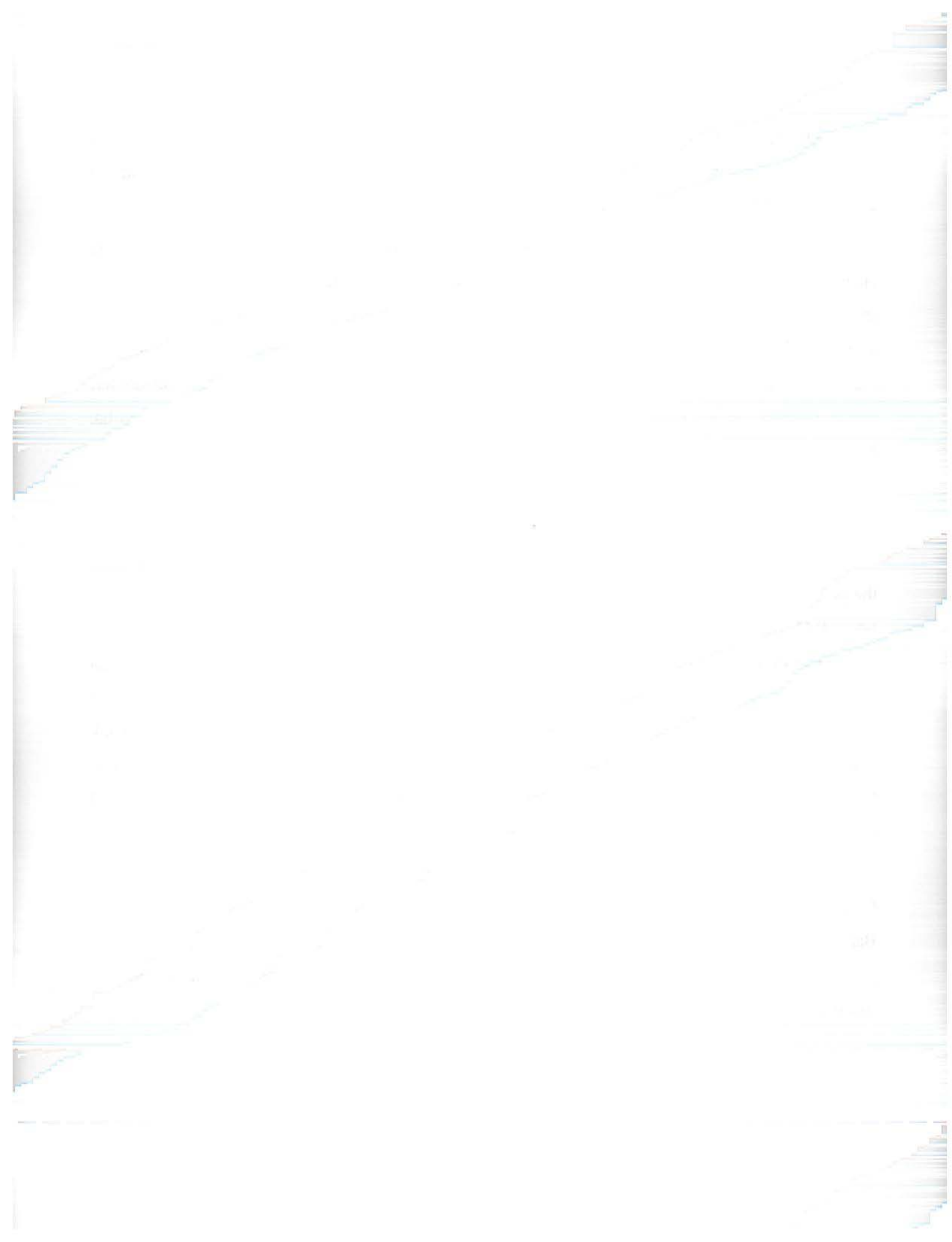


On 9/30/2019 your Affiant met with [REDACTED] in her room at [REDACTED]. [REDACTED] was able to provide her name and date of birth but was unable to provide a date, or year. Nor could she explain how long she had been in the facility or where her apartment was located.

On 9/30/2019 your Affiant met with Abraham Scott, Social Services for [REDACTED]. Scott stated that resident [REDACTED] was admitted into [REDACTED] on 6/27/2019. Scott stated that on 7/16/2019 he conducted a Brief Interview for Mental Status ("BIMS") on JM*. [REDACTED] scored [REDACTED]. Since her admission into the facility the bill for [REDACTED] remains unpaid. [REDACTED] was placed into the facility by her [REDACTED], Emily Royster, whose phone number, (504) 645-0899, is listed on [REDACTED]'s facheet. John Mills, [REDACTED], was provided as [REDACTED]'s emergency contact. Prior to coming to [REDACTED], [REDACTED] was living in an apartment on her own.

On 10/10/2019 your Affiant made contact with John Mills. Mills stated that [REDACTED] was living in New York until 2017. He added that [REDACTED] was having some [REDACTED] issues and was calling the police almost every day. [REDACTED] was moved to Ocala where most of the family is located. A week later, [REDACTED] was moved into [REDACTED] due to placement issues in Ocala. [REDACTED] became difficult to deal with so Emily Royster, [REDACTED], came and moved [REDACTED] into an apartment on [REDACTED] sometime in late 2017. According to Mills, and later confirmed by a review of bank records, Royster had set up rent payments to come directly from [REDACTED]'s bank account, Bank of America Adv Plus # [REDACTED] and # [REDACTED]. When payment was not being made, [REDACTED] contacted [REDACTED]'s [REDACTED], John Mills. Mills was able to get the bank records and noticed multiple withdrawals to Emily Royster via a Zelle transfer.

Mills stated that [REDACTED] was admitted into [REDACTED] after a second [REDACTED] in 2019. [REDACTED] contacted Mills regarding [REDACTED] not paying her room and board. Mills escorted [REDACTED] to Bank of America, where her account was, and that was when Mills learned that [REDACTED]'s money was gone. The bank officer told Mills that someone named Emily Royster was withdrawing money using Zelle, a mobile application that allows individual people to transfer money to others.



Mills contacted Royster who explained that she had removed the money om [REDACTED]'s account and split it three ways; with her sister, Ebony, and uncle, Chad Mills. Royster stated this was so [REDACTED] would be eligible for Medicaid.

A review of the certified bank records obtained from Bank of America revealed that [REDACTED] first opened savings account (# [REDACTED]) in November of 2015. [REDACTED] then opened checking account (# [REDACTED]) in July of 2017. [REDACTED] is listed as the individual owner of both accounts. [REDACTED]'s Social Security, in the amount of \$1,488.00, is deposited at the beginning of each month into the checking account ending in [REDACTED]. [REDACTED] has no other monthly income.

[REDACTED]'s balance of her savings account # [REDACTED] was \$15,544.40 as of the bank statement end date of 1/22/2019. Withdrawals from savings account # [REDACTED] included multiple transfers listed as "Zelle Transfer Conf# [9 letter-digit code]; Royster, Emily" with the first Zelle transfer, conducted by Emily Royster, from this account occurring on 2/19/2019 in the amount on \$900.00. The transfers continued until 9/6/2019 with the final transfer of \$100.00. On that same date of 9/6/2019 the available balance of [REDACTED]'s account ending in # [REDACTED] was \$30.07. In total from account # [REDACTED] there was \$11,735.00 of Zelle transfers completed by and paid to Emily Royster.

There was only one Zelle transfer conducted from the account ending in # [REDACTED]. The transfer was done on 8/2/2019 in the amount of \$70.00, completed by and paid to Emily Royster. The total for both accounts; # [REDACTED] and # [REDACTED], of Zelle transfers was \$11,805.00, and all completed by and paid to Emily Royster. Account information for Emily Royster was obtained from Zelle indicating an account in the name of Emily Royster, with phone number (504) 645-0899, and email as fabgirl78@gmail.com.

During the review of the Bank of America bank accounts belonging to [REDACTED] there were three transactions involving two different reservations with AirBnB. On 11/12/2019 your Affiant sent a subpoena to Airbnb INC. via their Law Enforcement Portal. The subpoena requested information involving the three transactions done from the Bank of America account belonging to [REDACTED]. The subpoena did not refer to Emily Royster. On 11/20/2019, your Affiant received the following email:



Airbnb request



Emily Royster <eroyster1023@gmail.com>

To: Dawn Pinkerton Marple

Retention Policy: OAG - Never Delete Inbox (Never)

You replied to this message on 11/21/2019 4:51 PM.

Reply

Reply All

Forward



Wed 11/20/2019 5:44 PM

Expires: Never

Hello

I was notified that there was a request for my account information. What information are you looking for and why?

--

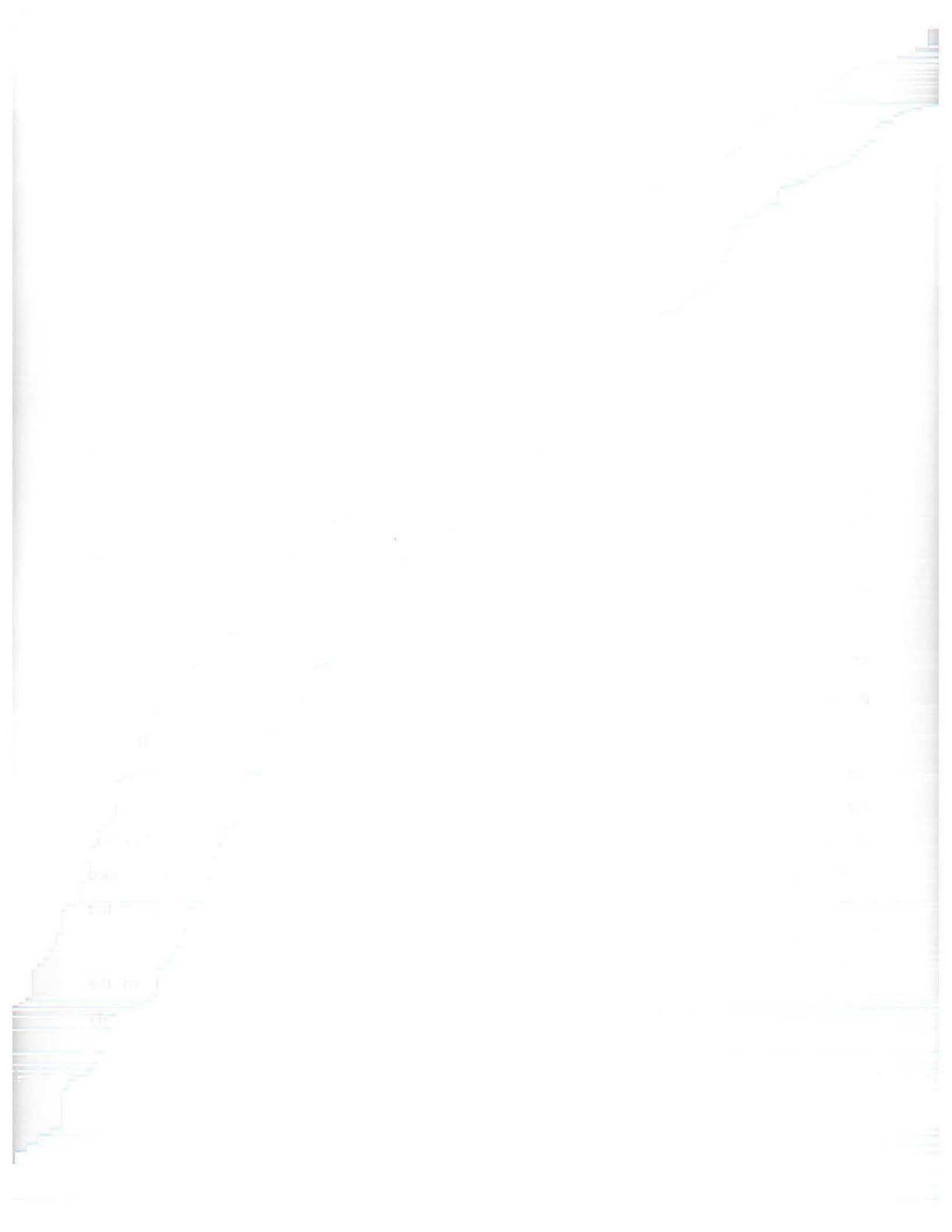
Regards, Emily Royster

A review of the documents received from AirBnB revealed a reservation was made for 2/26/2019 by Emily Royster for two nights in Atlanta Georgia. The second reservation was made for 3/1/2019 also by Royster for thirty nights in Haverhill Massachusetts. AirBnB records indicate the account the transactions were made was that of "Emily Royster," with an email eroyster@gmail.com and phone number (504) 645-0899.

The total dollar amount Royster used from [REDACTED]'s bank account to pay for the AirBnB was \$2,494.45. During the same time periods of both AirBnB stays there was bank activity on [REDACTED]'s account for transactions conducted in Tallahassee, Florida.

Certified bank records from Bank of America and Capital One belonging to Emily Royster were obtained. The Bank of America bank account # [REDACTED] is a trust account belonging to Kayla Heggie. Emily Royster is a signer on the account which was verified by her social security number ending # [REDACTED]. All of the Zelle withdrawals from [REDACTED]'s Bank of America accounts # [REDACTED] and # [REDACTED] were deposited into this Bank of America account # [REDACTED]. There were multiple debit card transactions occurring in Massachusetts throughout March 2019. There was no activity on the Capital One account.

Royster's certified application for a Louisiana driver's license was obtained from the Department of Motor Vehicle in Louisiana. The social security number matches the social security number used to identify Royster on both bank accounts; Bank of America and Capital One.



2/6/2020, your Affiant conducted a sworn and recorded interview with John Mills. Mills was asked to identify the individual in a photo. Mills was shown the photo taken from the Louisiana Driver's License belonging to Emily Royster. When Mills saw the photo he stated, "Emily Royster." Mills was asked if that was his niece and he replied, "Yes." Mills then signed the paper with the photograph on it and wrote, "I have ID her as niece."

Certified records received from Google, LLC revealed that the subscriber information for email address eroyster1023@gmail.com is for Emily Royster. The recovery email is fabgirl78@gmail.com., and the recovery SMS (phone number provided when account was created and used for account verifications) is +15044640899.

AT&T records for phone number (504) 645-0899 showed the subscriber name to be Emily Royster with home email eroyster1023@gmail.com.

Certified records from Medical Solution, an agency that provides traveling nurses, were received and show that during the time period of March 4, 2019 through June 1, 2019 Royster was working in a hospital in Melrose, Massachusetts. Royster's employment application lists her residence as 988 Washington Lane, Greensburg, LA 70441, her phone number as (504) 645-0899, and her email address as eroyster1023@gmail.com. Royster was also enrolled in direct deposit. The account Medical Solutions had on the direct deposit detail was the Bank of America account # [REDACTED].

Conclusion

Based on the aforementioned facts, [REDACTED] is the sole owner of two Bank of America accounts #1030 and #5273. Beginning February 2019, Emily Royster began taking [REDACTED]'s money out of both accounts by using a mobile app called Zelle. Royster also used [REDACTED]'s account #1030 to pay for AirBnB stays in Georgia and Massachusetts while [REDACTED] resided in Tallahassee, Florida. In total, Royster took \$10,000.00 or more out of bank accounts belonging solely to [REDACTED]. Investigator Dawn Pinkerton Marple, who being duly sworn, deposes and says that she has reason to believe and does believe that probable cause exists to establish that, on or about the dates of February 19, 2019 to

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Handwritten text on the left side of the page, possibly a list or notes.



September 6, 2019, Emily Royster, a black female, date of birth [REDACTED], last known address of 988 Washington Ln., Greensburg LA 70441, did commit, one (1) count of Exploitation of an elderly person or disabled adult; \$10,000 or more, but less than \$50,000 in Leon County, by knowingly obtaining or using the funds, assets, or property of [REDACTED], an elderly person or disabled adult, which had a value of \$10,000 or more, with the intent to temporarily or permanently deprive [REDACTED] of the use, benefit, or possession of the funds, assets, or property, or to benefit someone other than [REDACTED], while standing in a position of trust and confidence with [REDACTED], in violation of §825.103(1)(a) and § 825.103(3)(b), Florida Statutes.

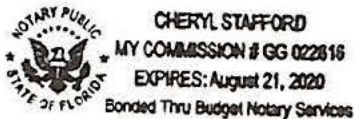
FURTHER, AFFIANT SAYETH NAUGHT.



Dawn Pinkerton Marple, AFFIANT
Law Enforcement Investigator
Medicaid Fraud Control Unit

State of Florida
County of Leon

The foregoing instrument was acknowledged, sworn to, and subscribed before me on this 16th day of June 2020, by Dawn Pinkerton Marple, who is personally known to me and who did take an oath.


Notary Public




Circuit Court/Acting Circuit Court Judge
Second Judicial Circuit of Florida



The following table lists the names of the individuals mentioned in the text, arranged in a column on the right side of the page. The names are:

Mr. J. W. [unclear]
Mr. J. W. [unclear]
Mr. J. W. [unclear]
Mr. J. W. [unclear]
Mr. J. W. [unclear]
Mr. J. W. [unclear]
Mr. J. W. [unclear]
Mr. J. W. [unclear]
Mr. J. W. [unclear]
Mr. J. W. [unclear]

The main body of the page contains a large, very faint and illegible text block, likely a list or a set of names, which has been mostly lost due to the low quality of the scan. The text is arranged in a grid-like fashion, with approximately 10 columns and 10 rows of entries.