




Memorandum



1501 NE 2nd Avenue, Suite 343, Miami, Florida 33132
Phone: (305) 523-0623 • Fax: (305) 523-0613

To: The Honorable Mari Tere Rojas, Chair
and Members, Miami-Dade County School Board

Dr. Jose L. Dotres, Superintendent
Miami-Dade County Public Schools

From: Felix Jimenez, Inspector General 

Date: January 11, 2024

Subject: Arrest of Former School Board Vice-Chair Lubby Navarro; Ref. IG-23-0001-SI

Lubby Navarro, former District 7 Miami-Dade School Board Member and Vice-Chair was arrested today on two counts of Organized Scheme to Defraud and two counts of Grand Theft. Ms. Navarro is charged with stealing over \$100,000 in public tax dollars from the School District prior to her resignation in December 2022. The Miami-Dade County Public Schools (M-DCPS) Office of the Inspector General (OIG) investigated the matter jointly with the Miami-Dade State Attorney's Office Public Corruption Task Force.

The investigation was referred to the OIG by M-DCPS Administration, after its Chief of Staff was asked to approve Ms. Navarro's final purchases and found irregularities with her M-DCPS issued purchase card statements, which had not been reconciled before her resignation. As a School Board member, Ms. Navarro had been issued two credit cards—one for small purchases (commonly referred to as a P-Card) and one to be used for travel expenses (a Travel Card). All M-DCPS employees and School Board members issued P-Cards or Travel Cards are trained on and must attest to understanding the M-DCPS Purchasing Card Program Policies. Personal use is strictly prohibited. Ms. Navarro was first employed with M-DCPS in 2002 and held various administrative positions. She became a School Board Member representing District 7 in 2015.

The investigation found that Ms. Navarro used her M-DCPS issued P-Card for personal purchases totaling over \$90,000. Her purchases included appliances, electronics, household furnishings, health and beauty products, and over 178 gift cards. Those 178 gift cards—all purchased within a 12-month period—amounted to over \$42,000. The appliances that she bought included a \$1,300 stainless steel refrigerator found in her home, and two 34 bottle wine coolers and a \$600 Breville espresso machine found at her ex-boyfriend's business.

Ms. Navarro also used her M-DCPS Travel Card for personal travel totaling over \$9,000. Those expenses included tickets and hotel stays for her ex-boyfriend's family to Disney, a Las Vegas trip to the Wynn Hotel for her and her ex-boyfriend, and a trip for her and her mother to Punta Cana in the Dominican Republic. These unauthorized purchases, the majority of which took place during calendar year 2022, were for her benefit and siphoned much needed resources from M-DCPS.

The OIG will work closely with the School District to determine the necessary internal controls to be instituted to prevent this from happening again. The OIG is grateful for the cooperative working relationship with the SAO's Public Corruption Task Force, and the assistance provided by School District staff and administrators during the course of the investigation. Attached is the arrest warrant and arrest warrant affidavit with additional information about the arrest and the criminal charges.

Moving forward, the OIG will be conducting a review of current and immediate past board members' P-Card usage.

Attachment

Cc: Jose Bueno, Chief of Staff, Office of the Superintendent
Ron Steiger, Chief Financial Officer
Vivian Santiesteban-Pardo, Chief Communication Officer
Ivan E. Silva, Chief of Police, Miami-Dade County Schools Police Department
Walter Harvey, School Board Attorney, Office of General Counsel
Jon Goodman, Chief Auditor, Office of Management and Compliance Audits

ARREST WARRANT FORM - 11TH JUDICIAL CIRCUIT – MIAMI-DADE COUNTY, FLORIDA

WARRANT TYPE: AW

CASE TYPE: F

AWPS #

Refile indicator: NO

Court case number:

Division:

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

YOU ARE HEREBY COMMANDED TO IMMEDIATELY ARREST THE DEFENDANT AND BRING HIM OR HER BEFORE ME, A JUDGE IN THE ELEVENTH JUDICIAL CIRCUIT OF FLORIDA. TO BE DEALT WITH ACCORDING TO LAW.

DEFENDANT'S NAME: (last) Navarro			(first) Lubby			(middle)		
STR/APT/CITY/ST/ZIP: 14219 SW 126 Path, Miami, Florida 33186								
DOB: 10/09/74	RACE: WHITE	SEX: F	HEIGHT: 5'7	WEIGHT: 180	HAIR: bro	EYES: bro		
SS #:	CIN #:	SID #:			FBI #:			
scars, marks, tattoos (use FCIC/NCIC abbreviations):					IDS #:			
driver's license #:	ST: FL							
veh tag #: NNWB38	state: FL	make: Nissan	model: Armada	year: 2018	color: D/Blue			
comments:								

BEFORE ME PERSONALLY CAME EUTIMIO CEPERO AND JOSE GONZALEZ (AFFIANTS), WHO, BEING DULY SWORN, STATES THAT THE DEFENDANT, LUBBY NAVARRO, DID COMMIT THE ACTS STATED IN THE ATTACHED STATEMENT OF FACTS, BASED UPON THIS SWORN STATEMENT OF FACTS, I FIND PROBABLE CAUSE THAT LUBBY NAVARRO, DID COMMIT THE CRIMES OF:

CHARGE # CHP/SEC/SUBS	INTENT INTENT/TYPE/DEGREE	COUNTS	VERSION	CHARGE NAME/DESCRIPTION
817.034(4)(a)1	F1	1	\$ 1,000,000.-	ORGANIZED FRAUD/SCHEME TO DEFRAUD/\$50,000 OR MORE
812.014(2)(b)	F2	1	\$ 500,000.-	GRAND THEFT SECOND DEGREE
817.034(4)(a)3	F3	1	\$ 250,000.-	ORGANIZED FRAUD-SCHEME TO DEFRAUD/\$20,000 OR LESS
812.014(2)(c)	F3	1	\$ 250,000.-	GRAND THEFT 3 RD DEGREE

*w/ Nebbia & house arrest told lockdown
surrender of passport*

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

POLICE CASE #: 64-23-07

AGENCY #: 056

AGENCY NAME: State Attorney's Office

ASA'S APPROVAL INITIALS: AR

UNIT #: 64

MIN/MAN:X Not Charged/Not Filed Charge Filed

EXTRADITE INFORMATION

- | | |
|--|---|
| <input checked="" type="checkbox"/> 1. Felony - Full extradition | <input type="checkbox"/> B. Misdemeanor - Limited extradition |
| <input type="checkbox"/> 2. Felony - Limited extradition | <input type="checkbox"/> C. Misdemeanor - Extradition - Surrounding states only |
| <input type="checkbox"/> 3. Felony - Extradition - Surrounding states only | <input type="checkbox"/> D. Misdemeanor - No extradition |
| <input type="checkbox"/> 4. Felony - No extradition | <input type="checkbox"/> E. Misdemeanor - Pending extradition |
| <input type="checkbox"/> A. Misdemeanor - Full extradition | |

SWORN TO BY AFFIANT: Eutimio Cepero

Court ID #: 001-0947
+ loc code if Miami-Dade

Date: 1/10/24

SO ORDERED THIS 10 DAY OF January, 2024.

*\$ 2,000,000.-
w/ house arrest level 1*

JUDGE IN THE 11TH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA

BOND AMOUNT

FIRST APPEARANCE JUDGE MAY NOT MODIFY CONDITION OF RELEASE PER RULE 3.131(D)(1)(IV)
(judge's initials) JP

*and Nebbia
and surrender of
PASSPORT*

- TO ANSWER UNTO THE STATE OF FLORIDA ON AN INFORMATION OR INDICTMENT FILED AGAINST HIM OR HER BY THE STATE ATTORNEY FOR THE CHARGE(S) OF:
- UPON ORDER OF A JUDGE IN THE 11TH JUDICIAL CIRCUIT OF FLORIDA FOR FAILURE TO APPEAR IN COURT TO ANSWER THE PENDING CHARGE(S) OF:

CHP/SEC/SUBS	INTENT/TYPE/DEGREE	COUNTS	VERSION	CHARGE NAME/description

JUAN FERNANDEZ-BARQUIN, CLERK OF THE COURT




BY: (Deputy Clerk)

(Date)

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

Your Affiant is Detective Eutimio Cepero of the City of Miami Police Department and an investigator assigned to the Miami-Dade County State Attorney's Office Multi-Agency Public Corruption Unit Task Force (hereinafter "PCU Task Force"). Your Affiant has been a police officer in the City of Miami Police Department for approximately 24 years. During this time, he has served as a patrol officer, a Special Victims Unit Detective, a Homicide Unit Detective, and an Internal Affairs Unit Detective. He is presently serving as a Specially Designated Investigator for the Public Corruption Unit Task Force and has been assigned to this case. Your Affiant has participated in numerous investigations involving public corruption. This investigation involved interviewing multiple witnesses, reviewing bank records subpoenaed from different institutions, and analyzing records from various organizations and businesses.

Your Co-Affiant, Jose Gonzalez, is a Special Agent with the Miami-Dade County (County) Office of the Inspector General (OIG). Your Co-Affiant has held this position since November 2016. Prior to being with the OIG, your Co-Affiant was a Postal Inspector, a sworn Federal Law Enforcement Officer, with the U.S. Postal Inspection Service from July 1989, through June 2014. As part of your Co-Affiant's duties in all positions, your Co-Affiant personally conducted and participated in numerous investigations and/or supervised others in the investigation of White-Collar Crimes, including Mail Fraud, Wire Fraud and Computer Crimes. In addition, your Co-Affiant has received both formal and informal training and instruction in these areas and has the credentials of Certified Fraud Examiner and Certified Inspector General Investigator. While your Co-Affiant is not a sworn law enforcement officer, the OIG is a Criminal Justice Agency authorized by Section 2-1076 of the Miami-Dade County Ordinance to detect, investigate, and prevent fraud, waste, mismanagement, misconduct, and abuse of power through independent oversight of County affairs, and seek appropriate remedies to recover public monies. Your Co-Affiant participated in this investigation and personally attended the interviews of those whose information is set forth herein, and/or has reviewed reports, records or received information from others appearing in this affidavit. As a result of your Co-Affiant's personal participation in this investigation and/or reports, oral and written, given to him, your Co-Affiant's review of relevant records, and your Co-Affiant's training and experience, your Co-Affiant is familiar with the circumstances of the offenses described in this affidavit.

Judge's Initials 
Affiant's Initials 
Co-Affiant's Initials 

Within this affidavit, your Affiants have not included each and every fact known to them concerning this investigation. Instead, your Affiants have stated only the facts believed establish the necessary foundation and probable cause for the arrest of LUBBY NAVARRO.

Pursuant to this investigation conducted by the PCU Task Force and OIG, your Affiants now make application for a warrant for the arrest of LUBBY NAVARRO (hereinafter "NAVARRO") for committing two (2) counts of Grand Theft in violation of Florida Statutes §812.014, and two (2) counts of Scheme to Defraud in violation of Florida Statutes §817.034.

Your Affiants have investigated the facts and circumstances surrounding this investigation and through their own discovery and knowledge and the knowledge learned by fellow assisting investigators, state the following:

On Monday, January 30, 2023, your Co-Affiant contacted the State Attorney's Office with information regarding an active investigation. According to your Co-Affiant, upper-level management from Miami-Dade County Public Schools (M-DCPS) became aware of possible irregularities on an outstanding credit card bill for former Miami-Dade County School Board Vice Chair, NAVARRO.

On Thursday, February 2, 2023, your Affiant was assigned to work on this investigation. Your Affiant met with your Co-Affiant and other OIG upper-level Administrators. The meeting was held to brief members of the State Attorney's Office PCU Task Force of the investigative findings obtained by the OIG.

Your Co-Affiant provided your Affiant with copious amounts of documents, including but not limited to, transaction receipts, bank statements, and still photographs of transactions conducted by NAVARRO at various retail stores, and a copy of the OIG's case file.

NAVARRO was employed with M-DCPS since 2002. First, as an administrative assistant to a School Board Member. She then held various positions at M-DCPS, including Executive Director for the Office of Governmental Affairs, Grants Administration, and Community Engagement. Additionally, in Miami-Dade County, NAVARRO was a legislative assistant to the chairman of the Board of County Commissioners, and in the county's Planning and Zoning Department. In 2015, NAVARRO was appointed by then Governor Rick Scott to fill a vacant seat as a Miami-Dade County School Board Member representing District 7. Miami-Dade County Schools are overseen by a nine-member board elected to four-year terms. NAVARRO was subsequently elected in 2016 and re-elected in 2020 for the same District 7 seat. NAVARRO also




served as Vice-Chair for the M-DCPS School Board. NAVARRO had an office located at the M-DCPS main district office, 1450 NE 2nd Ave., Miami, Florida 33132, as well as a “satellite” office at a school, the Robert Morgan Educational Center, 18180 SW 122 Ave., Miami, Florida 33177. On December 30, 2022, NAVARRO resigned from her position with the School Board before her term had concluded.

NAVARRO was and is still currently employed by Memorial Healthcare Systems as Vice President of Government Affairs, as well as by the Jorge Mas Canosa Freedom Foundation as an Executive Director.

During her tenure as School Board Member, NAVARRO was issued two credit cards: one known as a Purchasing Card (P-Card) meant for small purchases for day-to-day operations, and the other, a Travel Card, used for travel expenses for M-DCPS related travel activities. After a review of NAVARRO’S M-DCPS issued P-Card bank statements from JP Morgan Chase Bank, multiple unapproved charges were discovered which required further investigation. OIG Investigators also discovered NAVARRO had requested several credit line increases to her M-DCPS issued P-Card that were all approved during 2022.

Working in conjunction with the OIG, your Affiant launched an investigation into NAVARRO’S P-Card and Travel Card expenditures during the 2022 calendar year and some of 2021, which revealed documents and credit card statements indicating that NAVARRO utilized her M-DCPS issued P-Card for personal gain by making numerous unauthorized purchases from retail stores and services including, but not limited to, BrandsMart USA, Walmart, Home Depot, Office Depot, Staples, Apple Inc., Amazon, T-Mobile, FedEx, the Container Store, SpyTec GPS Inc., Sound Balance, EIG Constant Contact, UPS Store, USPS, GoDaddy.com, Party City, iDesign Sign & Print, Phones Are Us, and Dollar Tree. It was also revealed that NAVARRO utilized her M-DCPS issued Travel Card for unauthorized travel expenditures for personal gain and benefits. Your Affiants have, for the purposes of this affidavit, limited their investigation mostly to calendar year 2022 due to the extensive amount of records being received.

Your Affiants cannot include every record from the subpoenaed documents received in the course of this investigation in this Affidavit due to the copious volume, however, your Affiants are in possession of credit card bank statements and purchase receipts from the above-mentioned retail stores and service venues which could be presented upon request. Your Affiants have not included each and every fact known concerning this investigation.

Judge’s Initials 
Affiant’s Initials 
Co-Affiant’s Initials 

P-CARD SUMMARY




Records, store surveillance videos, and still photographs indicate that NAVARRO spent at least **\$92,047.92** on unauthorized purchases using her M-DCPS issued P-Card ending in #3246 (hereinafter, P-Card) from January 1, 2022, to December 31, 2022.¹ Purchases included appliances, electronics, clothing, health and beauty products, household goods, home furnishings, food, and over one-hundred and seventy-eight (178) unauthorized gift cards. The total value in gift cards (including the amount spent to activate the gift cards) was **\$42,266.69**. None of the items purchased by NAVARRO were returned to M-DCPS upon her resignation, nor was M-DCPS reimbursed by NAVARRO for any of the unauthorized purchases/spending. On July 25, 2023, search warrants for four (4) locations linked to NAVARRO were executed (which will be later discussed in this warrant); dozens of items purchased by NAVARRO using her P-Card were observed, photographed and/or seized.

P-Card Procedures

According to the M-DCPS Purchasing Card Program Policies and Procedures Manual, the P-Card program is designed to enable authorized district employees to procure small dollar purchases for materials and supplies needed for the day-to-day operations of their office and in connection with School Board-approved or school-related activities that benefit the District and serve a valid and proper public purpose.

All cardholders have limits that are defined by the worksite administrator as guided by the M-DCPS Purchasing Card Program Policies and Procedures Manual. Limitations are assigned to each card through the bank and enforced at the point of purchase. Among the limitations set by M-DCPS, are limitations such as the amount charged in a single transaction, and the type of purchase made. If a School Board Member wished to purchase a single item over \$999.99, the School Board Member was required to obtain three quotes from vendors prior to purchase. The limit for a single P-Card transaction at the time was \$2,999.99. Any transaction exceeding this limit would be declined by the bank. The Manual also stated that personal, inappropriate or illegal use of the purchasing card and/or failure to strictly comply with the limitations and requirements set forth in the Policies and Procedures Manual may result in a loss of purchasing card privileges, disciplinary action, up to and including termination, personal responsibility for any and all

¹ Although the scope of this affidavit is generally focused upon calendar year 2022, various purchases from Apple from 2021 are also included in this affidavit.

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Co-Affiant's Initials 

inappropriate charges, including finance charges and interest assessed in connection with the purchase, and/or possible referral to law enforcement authorities for prosecution.

The District has its P-Card process with JP Morgan which has an online system which allows P-Card holders to view daily transactions, enter/generate disputes on charges, download the monthly statement and view authorizations and declines. The process to access the bank is given to each cardholder in a training class. Each work location administrator (NAVARRO is the work location administrator for District 7) is responsible for ensuring their monthly statement is downloaded from the online banking system, PaymentNet, either by themselves directly or the individual who they have assigned to reconcile their account. The work location administrator is responsible for ensuring each transaction on the statement is reconciled to the monthly Purchase Authorization Form(s) (FM-5707) ensuring all billed charges match the original receipts from each purchase. The applicable forms detailed in the Manual and corresponding invoices/receipts must be maintained at the work location for audit purposes.

Although not all inclusive, the Miami-Dade County Public Schools Purchasing Card (P-Card) Program Policies and Procedures Manual specifically forbids the purchase of the following items:

- 1) Purchase of items for personal use (i.e. bottled water, coffee, cups etc.)
- 2) Equipment for personal use (i.e. microwaves, refrigerators, coffee makers, etc.)
- 3) Items for personal use (i.e. air purifiers, fans, heaters, electronic equipment, medicine, clothing, gifts, stationery, greeting cards, party supplies, decorative mouse pads, entertainment, holiday items, etc.)
- 4) Salary and monetary awards
- 5) Cash advances of any kind
- 6) Travel and Entertainment related expenditures
- 7) Hospitality, decorations and beautifications such as refreshments, coffee, water, cups, plates, bottled water, picture frames, designer or specialized supplies or equipment, plants, wallpaper, air fresheners such as plug-ins, etc.
- 8) Rental agreements
- 9) All Furniture, Fixture and Equipment (FF&E) where the unit price of each item is greater than \$999.99

- 10) Any product procured by M-DCPS Stores & Mail Distribution (S&D), including cases of paper, custodial supplies, chemical/custodial products as determined by Custodial Standard Committee
- 11) Other miscellaneous items such as cash advances of any kind, tools and equipment not authorized by the Safety Department, and any items in support of extracurricular school activities
- 12) Taxes,² late penalties/fees and interest charges
- 13) Utilities and telephone expenses, including cellular phones, unless authorized by the Department of Energy and Communication Management
- 14) Charges totaling \$2,999.99 or more per vendor per purchase/charge is not allowed. Splitting transactions³ is not allowed except for office supply items

On February 23, 2015, NAVARRO signed an M-DCPS Purchasing Card Program Cardholder Agreement with full understanding of how the P-Card program worked. See below.

² The card itself displays the tax-exempt number and should be sufficient identification to allow purchases to be made tax-free.

³ Splitting transactions refers to dividing a single and full amount of payment in two or more simultaneous transactions in order to avoid transaction limits.





M-DCPS PURCHASING CARD PROGRAM
CARDHOLDER AGREEMENT

I, Lubby Navarro agree to the following regarding
(please print your full name)
my use of the Miami Dade County Public Schools Purchasing Card Program with J.P. Morgan:

1. I understand I am being entrusted with a powerful and valuable tool and will be making financial commitments on behalf of M-DCPS, and will strive to obtain the best value for M-DCPS. Additionally, I will follow all my work location's and M-DCPS purchasing requirements.
2. I understand the Purchasing card must be secured at all times and cannot be loaned or used by anyone else.
3. I understand and agree that the use of this Purchasing Card is for Business use solely and under no circumstances will I use the Purchasing Card to make personal purchases, either for myself or for others. Willful intent to use the Purchasing Card for personal gain may result in disciplinary actions, including termination of employment.
4. I agree that should I violate the terms of this Agreement and use the Purchasing Card for personal use or gain that I will reimburse M-DCPS for all incurred charges and any fees related to the collection of those charges.
5. I agree to follow the established procedures for using the Purchasing Card including viewing all transactions on the J.P. Morgan PaymentNet System upon notification to validate the validity of the posting to my account. Failure to do so may result in either revocation of my use privileges or other disciplinary actions.
6. I agree to notify the Bank by phone upon immediately determining the card has been lost, stolen, misappropriated, improperly used or compromised. I also agree to notify the bank within 15 days from the monthly statement date of any disputes identified and assist the Bank in attempting to obtain reimbursement from the Merchant.
7. I further understand and agree that unauthorized usage, abuse, not reconciling all posted transactions in a timely manner or failure to pay outstanding balances may result in revocation of all charge privileges and/or disciplinary action.
8. I agree to turn in the Purchasing Card upon my termination of employment from M-DCPS or should I change positions/work location and upon a change in position/work location determine if a new card needs to be issued.
9. I agree to follow the procedures listed in the Purchasing Card Procedures Manual and understand the requirements for using the Purchasing Card Program.

Lubby Navarro
Cardholder's Signature

Lubby Navarro
Work Location Purchasing Card Administrator's Signature

Lubby Navarro
Cardholder's Name (Print)

Lubby Navarro
Work Location Purchasing Card Administrator (Print)

2/23/15 259655
Date Employee #

2/23/15 259655
Date Employee #

1945700
Location Number (ex: 1xxxx00)

1945700
Location Number (ex: 1xxxx00)

Distribute to:
Cardholder (copy). Please complete the cardholder's Account set up form as well.
Work Location Purchasing Card Administrator (copy).
M-DCPS Purchasing Card Administrator (Mail original to Accounts Payable/P-Card Section 9999/602).

FM-6462 Rev. (12-14)

On February 25, 2015, NAVARRO signed a Miami-Dade County Public Schools Cardholder Set-up Form indicating the P-Card had been issued to her. Then, on March 4, 2015, NAVARRO acknowledged receiving the training on the proper usage of the P-Card by signing the following "P-Card Process Acknowledgement" form. See below.

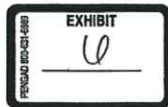
Judge's Initials JP
Affiant's Initials [Signature]
Co-Affiant's Initials [Signature]

P-Card Process Acknowledgement

I am aware of the resources available surrounding the use of the Purchasing Card, the reconciliation of the account and access to the Payment Net system.

- 1) P-Card manual is under Ehandbooks
- 2) Training class PowerPoint and forms are at <http://tlc.dadeschools.net/>

<u>Lubay Navarro</u> Signed	<u>Lubay Navarro</u> Print Name
<u>3/4/15</u> Date	<u>2591055</u> Employee #
<u>School Board member</u> Location Name	<u>1945700</u> Location #



TRAVEL CARD SUMMARY

Additional subpoenaed travel records revealed NAVARRO spent as much as **\$9,061.55** on unauthorized purchases on her M-DCPS issued Travel Card ending in #2761 (hereinafter, Travel Card). Travel purchases revealed unauthorized personal trips including air travel, hotels, meals, car rentals, and entertainment for herself, friends, and family to Las Vegas, Nevada and

Judge's Initials JP
Affiant's Initials [Signature]
Co-Affiant's Initials [Signature]

Punta Cana, Dominican Republic. M-DCPS was never reimbursed for any of these unauthorized travel/expenditures prior to NAVARRO'S resignation or to date. Additionally, NAVARRO never received prior approval by the school board for travel outside the district, nor submitted itemized lists detailing the travel as required by Florida Statute §1001.39.

Travel Card Procedures

M-DCPS delineates Travel Card Usage Procedures: The purpose of the Travel Card is to assist in booking travel arrangements and avoiding delays, especially when flight availability may be limited. All travel must follow School Board Policy 6550 Travel and Per Diem guidelines. Travel card usage is limited to purchasing airline tickets, hotel accommodations, and ground transportation while on official business. The Travel Card may not be used for travel for staff or family members who may be traveling with the Travel Card holder while on official business. Meals are not allowed on the Travel Card. The Travel Card must be reconciled every month. The reconciliation of the Travel Card is separate from the office Purchasing Card (P-Card) reconciliation and follows the same reconciliation process. The Travel Card holder must ensure there is a Purchase Authorization Form for every charge and a receipt for every charge. Additionally, Florida Statute §1001.39, District school board members travel expenses, states "any travel outside the district that exceeds \$500 requires prior approval by the district school board to confirm that such travel is for official business of the school district and complies with rules of the State Board of Education. Any request for travel outside the state must include an itemized list detailing all anticipated travel expenses, including, but not limited to, the anticipated costs of all means of travel, lodging and subsistence. Immediately preceding a request, the public must have an opportunity to speak on the specific travel agenda item."

RELEVANT LOCATIONS

Multiple surveillances were conducted by the PCU Taskforce on four (4) different locations associated with NAVARRO. The first of which is NAVARRO'S primary listed residence of 11840 SW 177 Terrace, Miami, Florida 33177 (hereinafter, NAVARRO'S abandoned property). Records indicate that this address is registered to Lubby Gonzalez (by marriage), now known as NAVARRO. It was later revealed that NAVARRO did not live at this address, but rather at the second location, 14219 SW 126 Path, Miami, Florida 33186 (hereinafter, NAVARRO'S townhouse). Records indicate that this townhouse is rented by Ms. Stephanie Marie Martinez (by

marriage), formerly known as Stephanie Marie Navarro, though NAVARRO lives at this location. Ms. Stephanie Marie Martinez is NAVARRO'S daughter. According to subpoenaed documents from BrandsMart USA, several purchases made by NAVARRO with her P-Card were delivered to this address and were also found at this address. The third location is Shook Market located at 2613 Stirling Road, Ft. Lauderdale, Florida 33312 (hereinafter, Shook Market). According to subpoenaed documents received from BrandsMart USA, several purchases made by NAVARRO via her P-Card were delivered there. Investigation revealed that Shook Market is owned by NAVARRO'S friend/former romantic partner, M.D. The fourth location is Handy Storage Sixteen located at 16749 SW 117 Avenue, Miami, Florida 33177 (hereinafter, Handy Storage). Handy Storage is a storage facility that offers units for rent on a monthly basis. Records indicate that units 3099 and 3100 at Handy Storage Sixteen were rented by NAVARRO and paid for with at least eight (8) different gift cards purchased using NAVARRO'S P-Card. On July 25, 2023, your Affiant obtained signed search warrants for each of the four (4) locations listed above. Numerous items purchased by NAVARRO using her P-Card were located and tied to three of the four locations which will be discussed further. Photographs were taken upon the execution of each warrant and several are attached as exhibits and will be discussed and explained in further detail.

STATEMENTS

Your Affiants spoke to several witnesses during the course of the investigation, including but not limited to current and former M-DCPS employees, many of whom know and/or worked closely with NAVARRO.

JOSE BUENO

On May 2, 2023, M-DCPS Chief of Staff, Jose Bueno, provided a sworn statement. According to Mr. Bueno, his position entails being a liaison between the School Board Members and the Superintendent of M-DCPS. He oversees everything having to do with the Superintendent's office, including M-DCPS policies and procedures. Mr. Bueno has known NAVARRO professionally since 2005. Mr. Bueno explained that Board Members are responsible for completing their own monthly P-Card reconciliation. Mr. Bueno indicated that in certain circumstances, he has the ability to approve credit card purchases made by School Board Members. Since NAVARRO left the School Board on December 30, 2022, her reconciliation paperwork for December made its way to his desk for final approval in early January 2023. Mr. Bueno stated that

upon examining NAVARRO'S December 2022 paperwork, which consisted of a bank statement and page 1 of the Monthly Reconciliation Work Sheet (FM-5828), he was alarmed by the amount NAVARRO had spent, which was \$13,432.36. Mr. Bueno was also concerned with the fact that there was missing documentation, such as the Purchase Authorization Form (FM-5707), and all invoices and receipts for the items NAVARRO had purchased during that time. Mr. Bueno observed large purchase amounts made from Walmart stores and other stores which triggered him to review the M-DCPS Purchasing Card Program Policies and Procedures Manual for the list of allowable expenses. Mr. Bueno did not believe the purchases made by NAVARRO were allowable expenses under M-DCPS policies, therefore, he did not approve the paperwork.

Mr. Bueno then reviewed NAVARRO'S monthly bank statements from October 2022 and November 2022 which also raised concerns. He explained that it was the type of stores and the frequency in which purchases were made at each of those stores that alerted him. He also noticed several purchases made at the same store during the same day.

Mr. Bueno then met with the M-DCPS Chief Financial Officer (CFO), Mr. Ron Steiger, and provided him with the documents he had obtained. Mr. Bueno explained his concerns to Mr. Steiger and expressed that he did not feel comfortable signing the authorization for payment. Mr. Bueno and Mr. Steiger then accessed Walmart's website which has a Receipt Lookup tool and were able to view the actual receipts along with images of the items purchased using NAVARRO'S P-Card. Mr. Bueno and Mr. Steiger discovered NAVARRO'S P-Card was used to purchase items such as food, gift cards, bottles of wine, and clothing among other things, which are unauthorized purchases under Miami-Dade County School Board policy.

Your Affiants presented Mr. Bueno with various printouts of items purchased using NAVARRO'S P-Card from stores such as Walmart, Home Depot, and BrandsMart USA. According to Mr. Bueno, the majority of the items shown to him were not allowed for purchase under School Board policy. Mr. Bueno explained that some items could be allowed with proper documentation; for example, if the items were purchased for a school or donated to a child, there should have been a detailed explanation as to why the item was purchased and where or to whom the property would be housed. Upon examination of the above-mentioned printouts, Mr. Bueno confirmed that none of the items shown to him have ever been given, donated, or assigned to any school site or any building that he is aware of. Additionally, Mr. Bueno stated NAVARRO never submitted any of the required documentation regarding the purchase or donation of any of the


items purchased utilizing her P-Card, nor were they returned by NAVARRO upon her resignation from the School Board. Furthermore, Mr. Bueno did not recall NAVARRO'S P-Card ever being reported lost or stolen.

Mr. Bueno was presented with six (6) in-store security surveillance still photographs taken from Walmart stores on several dates where NAVARRO'S P-Card was used. Mr. Bueno positively identified NAVARRO as the person exiting the store each time her P-Card was utilized.

RON STEIGER

On May 2, 2023, Mr. Ron Steiger, M-DCPS Chief Financial Officer (CFO), also provided a sworn statement. Mr. Steiger has been CFO since 2017 and employed by M-DCPS since 2005. Mr. Steiger stated he has known NAVARRO for many years but began working with her more closely when she became a School Board Member.

Mr. Steiger stated he is responsible for all traditional finance functions for M-DCPS along with risk management, procurement, grants, and federal, and state compliance. His position is overseen by the nine (9) School Board Members. Every school under each School Board Member's District is given a yearly budget. Each School Board Member is responsible only for their own office's budget. Mr. Steiger explained that P-Cards are given to School Board Members to buy small items that would be unfeasible to go through the procurement process, or to expedite purchases in times of need. The budget allocated to each School Board Member are tax dollars and each Member is guided by statute and policy on how to spend it. Training is provided to School Board Members by the Accounts Payable Office when they receive a P-Card. The reconciliation of P-Cards is the responsibility of each School Board Member. Once the reconciliation is completed, it should be forwarded to the Accounts Payable Office who will then pay the credit card company. The purchase of items such as food for themselves or even for students utilizing tax dollars is strictly prohibited. Mr. Steiger also added that generally the purchase of gift cards is not allowed. If a gift card were to be purchased by a School Board Member for any specific reason, it would require substantial paperwork, authorizations, and oversight. NAVARRO never submitted any gift card authorizations. Moreover, when asked about items such as furniture, appliances, and office products that could be school-related, Mr. Steiger stated that none of these items were distributed to any schools within NAVARRO'S District, nor were they returned by NAVARRO upon her resignation. Mr. Steiger also confirmed that no such items were left in NAVARRO'S office for other School Board Members to inherit when she left the School Board.



Mr. Steiger was also presented with five (5) in-store security surveillance still photographs taken from Walmart stores on several dates where NAVARRO'S P-Card was used. Mr. Steiger positively identified NAVARRO as the person exiting the store each time her P-Card was utilized.

ERIC OJEDA

On August 7, 2023, your Affiants spoke to Mr. Eric Ojeda, M-DCPS Administrative Director of Accounts Payable, who provided a sworn statement. According to Mr. Ojeda, he is responsible for processing all accounts payables, including all payments to vendors from all purchases made by the entire school district. He is also responsible for the administration, training, assignment, and monthly reconciliation of all P-Cards issued within the entire school district. According to Mr. Ojeda, only work site administrators such as School Principals, the Superintendent, School Board Members, and the highest ranking Administrator of each "non-school site" are allowed to possess P-Cards. There is also a travel credit card program available only to the nine (9) School Board Members, the Superintendent, and the School Board Lobbyist. Mr. Ojeda is responsible for the administration and monthly reconciliation of the Travel Card as well.

According to Mr. Ojeda, all Board Members are required to take training on the proper use of the P-Card including a review of the M-DCPS Policies and Procedure Manual. During this training, Board Members are told what kind of items are allowed and not allowed to be purchased with the P-Card. It is explained to them that anything sold by the M-DCPS stock room should not be purchased with the P-Card such as cases of paper, custodial supplies and chemicals, and other things the district buys in bulk. Mr. Ojeda went on to explain that P-Card holders may not purchase with tax-payer funds anything that you can eat, drink, or store. Specifically, Board Members are told they cannot buy items such as refrigerators, microwaves, coffee makers, blenders, air purifiers, heaters, fans, medicine, electronic equipment, clothing, gifts, decorative mouse pads, entertainment, stationery, greeting cards, party supplies, alcohol, or wine with the P-Card. Groceries are not allowed unless it is used for a curriculum based culinary class. Gift cards are not allowed unless there is sufficient documentation of whom the gift card is given to, and all gift card documentation must remain at the worksite and be available for audits. The gift card cannot be more than \$100.00. The receiver of the gift card must also sign the documentation. Mr. Ojeda also stated that utilities and telephone expenses, including cellular phones, are not allowed unless



authorized by the Department of Energy and Communication Management because M-DCPS provides phones and/or phone allowances to all Board Members.

According to Mr. Ojeda, per M-DCPS Policies and Procedures, the P-Card can only be used for M-DCPS purposes and not for personal use. The security of the P-Card is the cardholder's responsibility as the P-Card is the property of M-DCPS and is to be used only for district related purposes. Mr. Ojeda explained that it is up to each Board Member to keep records of all purchases and have them readily available at their location for audits and record-keeping purposes. Details of purchase receipts, vendor invoices, and/or screenshot confirmations must be recorded on Form 5707 and retained by all worksites, including Board Members. Mr. Ojeda stated that the Accounts Payable Department is not responsible for auditing the Board Members' expenditures or card statements, though he has made inquiries to cardholders when seeing something questionable. The department in good faith processes the Board Members' expenditures and it is up to each Member and their office to keep documents and receipts in order and make sure that their reconciliation paperwork is certified and correct.

Mr. Ojeda described that each Board Member has a monthly spending limit set at \$6,000.00 for their P-Card. Furthermore, there is a "single transaction" or a "single purchase" limit of \$3,000.00. Meaning, any single transaction over \$3,000.00 is automatically declined by the bank. Per School Board policy, any single purchase transaction over \$3,000.00 requires a "shopping cart purchase order." A shopping cart purchase order is a requisition or listing of items requested which goes through an approval process via the purchasing system. There is also a "daily velocity" limit, which means the number of transactions that can occur within a single day is set at 10 transactions. There is also a daily spending amount set at \$4,000.00.

Board Members are able to request a credit line increase for a particular month. Mr. Ojeda stated that NAVARRO was the only Board Member that requested credit line increases in 2022 to his recollection. He remembered NAVARRO requesting increases frequently. NAVARRO'S P-Card bank statements revealed that NAVARRO requested credit line increases in every month in 2022 except July and October where the standard limit remained at \$6,000.00. The following list itemizes NAVARRO'S 2022 monthly credit line increases according to NAVARRO'S P-Card bank statements:

- In January 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$8,000.00**.
- In February 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$8,000.00**.




- In March 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$8,000.00**.
- In April 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$8,000.00**.
- In May 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$8,000.00**.
- In June 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$12,3000.00**.
- In August 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$15,000.00**.
- In September 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$15,000.00**.
- In November 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$9,000.00**.
- In December 2022, NAVARRO'S total monthly limit was increased from \$6,000 to **\$13,500.00**.

Mr. Ojeda stated that Board Members are told what they may and may not do with Travel Cards during training. He stated that Board Members with Travel Cards are only allowed to make purchases such as airline tickets, hotel, car rentals (Avis only since a contract is in place), and Uber and Lyft transportation. No food whatsoever should be purchased with the Travel Card. Any purchase of food with the Travel Card must be reimbursed to M-DCPS. Board Members are not allowed to utilize their Travel Card for family and friends. Mr. Ojeda does not recall or is aware of NAVARRO ever reimbursing M-DCPS for ineligible expenses made on her P-Card or Travel Card.

Your Affiants presented Mr. Ojeda with photos of items purchased by NAVARRO from Walmart, BrandsMart USA, Home Depot, and other stores. Your Affiants asked Mr. Ojeda if any of the items shown to him were allowable purchases utilizing a P-Card. Mr. Ojeda stated they were not. When asked about electronics, such as laptops, Mr. Ojeda stated that a P-Card holder could purchase a laptop with the P-Card and use it at home if they are working from home or the office, however, upon termination, "any purchases made on the P-Card for equipment is the property of the district and should have been returned [to the district]." On December 30, 2022, upon learning that NAVARRO had resigned, Mr. Ojeda suspended NAVARRO'S credit card access.

JAANELLE YEE

On October 11, 2023, Ms. Jaanelle Yee, former Administrative Assistant to NAVARRO, provided your Affiants with a sworn statement. Ms. Yee stated she was contacted by NAVARRO in 2020, during the pandemic, and offered a job. NAVARRO is a personal friend of the Yee family. Ms. Yee worked for NAVARRO from June 2020 until NAVARRO resigned her position as Vice


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Chair of the School Board in December 2022. As Administrative Assistant to NAVARRO, her responsibilities included social media, preparing newsletters, preparing and submitting monthly credit card reconciliation paperwork, answering phones and e-mails via the District 7 Board Member e-mail address, among other tasks. According to Ms. Yee, she contracted _____ during NAVARRO'S last week in office, December 2022, and could not assist NAVARRO with moving and clearing the District 7 office. When she was medically cleared of _____ in January 2023, she returned to the District 7 office to find it completely empty except for Ms. Yee's desk and desktop computer. Everything else, including all files, were gone. Ms. Yee resigned from M-DCPS a short time later because the new District 7 Board Member was bringing her own staffers.

Ms. Yee stated that in January of 2023, NAVARRO gave her "a bag full of stuff" in order to be returned to the district office. Ms. Yee does not recall specifically what was in the bag other than it had some electronics. An M-DCPS "Exit Checklist" and "Delivery Receipt" confirm that Yee turned in two district-issued Samsung cell phones and three laptops (one HP Pavilion Laptop-Model 15-eg0025od and two Lenovo laptops) on NAVARRO'S behalf. Store records and receipts revealed NAVARRO purchased two (2) HP Pavilion laptops using her P-Card, however, they were different models than the one NAVARRO returned to M-DCPS.

Ms. Yee recalls NAVARRO having an M-DCPS issued credit card. Ms. Yee explained that she would download and print out NAVARRO'S bank statements (having PDF access only) from the JP Morgan website, and then print out the statements. She would then manually fill out the work sheets for NAVARRO'S P-Card account and Travel Card account. Once done, she would e-mail the hand written work sheets and their corresponding PDF bank statements to NAVARRO for approval. According to Ms. Yee, once NAVARRO reviewed and approved the hand written work sheets and PDF bank statements, NAVARRO would e-mail them back to her. Ms. Yee would then type out the previously hand written amounts onto the worksheet and prepare a copy of it along with the PDF bank statement in a manilla folder for NAVARRO to sign when she came in to the office twice a month. NAVARRO would hand the signed forms back to Ms. Yee and Ms. Yee would then sign them herself as the "preparer," and scan and upload them into the M-DCPS electronic system for the Accounts Payable department. Ms. Yee would place the final signed forms into an office drawer. She stated that she does not know where those files went after NAVARRO resigned. She assumed NAVARRO took the files with her upon her separation from M-DCPS.




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According to Ms. Yee, NAVARRO never provided her with receipts or invoices for purchases that were made with her P-Card or Travel Card. On rare occasions, NAVARRO would give her an Uber or a meal receipt from her travels which she would file into the same drawer with the reconciliation documents. Ms. Yee explained that she never looked at NAVARRO'S statements nor did she ever question NAVARRO about any of the purchases on either of the statements. On frequent occasions, Ms. Yee would receive e-mails from Accounts Payable questioning specific purchases made on NAVARRO'S P-Card. Ms. Yee would forward the e-mail to NAVARRO and await her instructions on how to respond to the e-mail. Ms. Yee stated that her responses to Accounts Payable were based "verbatim" on what NAVARRO had told her. Ms. Yee was presented with an email thread dated December 1, 2021, between her and Eric Ojeda, M-DCPS Accounts Payable Director. In the email, Mr. Ojeda asks Ms. Yee regarding two charges on the November 2021 statement from T-Mobile, each for \$568.22. Mr. Ojeda wrote, "I need to understand what they are for as Utilities and Telephone expenses are not allowed to be purchased using the P-Card." Ms. Yee responded that she had spoken to NAVARRO about the charges and that the T-Mobile purchases were for equipment unrelated to telephones. Ms. Yee confirmed that what she told Mr. Ojeda was what NAVARRO told her to respond with.

Ms. Yee was presented with several monthly reconciliation packets she had submitted consisting of the Monthly Reconciliation form (FM-5828) and attached JP Morgan bank statement. Ms. Yee was also presented with the original corresponding bank statements directly from JP Morgan. When comparing the bank statement she had submitted to the one presented to her, Ms. Yee noticed the bank statements she had uploaded were altered from the originals. Ms. Yee denied ever altering or doctoring any documents or bank statements. She confirmed that the bank statements she had e-mailed to NAVARRO had been altered upon their return from NAVARRO. According to Ms. Yee, she and NAVARRO were the only two people involved in the reconciliation process during Ms. Yee's tenure working for NAVARRO. She further stated that she felt it was not her job to look at or inspect the bank statements returned to her from NAVARRO.

When questioned about several credit line increases to NAVARRO'S P-Card, Ms. Yee stated that she remembers submitting the paperwork per NAVARRO'S instructions on at least two occasions but did not know the reasons.

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STEPHANIE MARTINEZ

On August 16, 2023, Ms. Stephanie Martinez, NAVARRO'S daughter, provided your Affiants with a sworn statement. Martinez stated she resides in Miami with her husband, her in-laws, and her 18-month-old child. She originally lived with her mother, NAVARRO, at 11840 SW 177 Terrace, Miami, Florida 33177 (NAVARRO'S abandoned home). Ms. Martinez stated that in April 2020, she and NAVARRO decided to move because the house was in need of repairs. She stated they moved to a townhouse located at 14219 SW 126 Path, Miami, Florida 33186, where she resided until she married and moved in with her husband in October of 2021. Ms. Martinez stated that the house at 177 Terrace is now abandoned. Ms. Martinez further stated her maternal grandmother, Zoila Luperon, lives in Cutler Bay but stays with NAVARRO at the townhouse often.

During the interview, Ms. Martinez initially denied ever accepting any gift cards from NAVARRO. She claimed the only gift card NAVARRO had ever given to her was a \$50.00 or \$100.00 gift card for her birthday in July 2022. She remembered only accepting that one gift card from NAVARRO. She also recalled periodically calling the number listed on the back of the gift card to obtain the remaining balance. Ms. Martinez denied ever seeing numerous gift cards in NAVARRO'S purse. Your Affiants presented Ms. Martinez with subpoenaed documents from BlackHawk Network showing that Ms. Martinez had placed several calls from her cell phone number to check remaining balances on more than one gift card (having been purchased with NAVARRO'S P-Card). Ms. Martinez ultimately remembered having been gifted from NAVARRO a \$500.00 Disney gift card which she used to pay a hotel in Disney for her child's first birthday in February 2022. Ms. Martinez also admitted having received two or three other gift cards from NAVARRO with about \$200.00 each. Ms. Martinez stated she used those gift cards to purchase baby products at Walmart and Publix Supermarket. Ms. Martinez denied knowing NAVARRO possessed a School Board issued credit card.

According to Ms. Martinez, NAVARRO purchased a new couch and a new refrigerator for the townhouse kitchen a few months ago but does not know from where NAVARRO purchased the items. Ms. Martinez admitted receiving a rose-colored gold Apple watch from NAVARRO as a graduation gift in May 2022 during a celebratory dinner. She activated and linked the watch via her iPhone and has since downloaded several apps such as Spotify to the watch. All the downloaded apps are paid via her personal credit card.






Ms. Martinez was questioned regarding NAVARRO'S relationship with M.D. She stated that they had a boyfriend/girlfriend relationship in the past. Ms. Martinez advised that she met M.D. one day when NAVARRO had him over at the townhouse. She believes NAVARRO and M.D. began dating in October 2021. She is not sure when they broke up but knows that M.D. lives in Broward and has a juice market business there. Ms. Martinez acknowledged that NAVARRO and M.D. took a trip to Las Vegas for a weekend before they broke up. She was also aware that NAVARRO and her grandmother, Zoila Luperon, took a trip to Casa de Campo, Punta Cana in the Dominican Republic at one point as well.

ANGEL LOPEZ

On August 16, 2023, Mr. Angel Lopez provided your Affiants with a sworn statement. According to Mr. Lopez, he met NAVARRO during her 2015 campaign and began to work for her on a personal level assisting her with odd jobs such as painting, being her chauffeur, mechanic, handyman, assisting her with the Jorge Mas Canosa Freedom Foundation, and eventually assisted NAVARRO in organizing her events. NAVARRO would compensate him in cash for completing these odd jobs. From December 2021 to December 2022, Mr. Lopez worked as an office clerk for NAVARRO at the District 7 satellite location, the Robert Morgan Educational Center. His duties were to complete any tasks issued by NAVARRO, including carrying and delivering donations, picking up school supplies from stores such as Staples, Target, and Office Depot, and organizing events. Mr. Lopez then became an office clerk for Miami South Ridge Senior High School in January 2023. Mr. Lopez currently owns a transport company dedicated to the transport of children to and from three different schools.

Mr. Lopez denied ever being given or compensated with gift cards by NAVARRO, however, he admits having called to check balances on gift cards found at her house while organizing her house. He explained that on many occasions, while NAVARRO was away, she would task him with organizing her things at her townhouse. Mr. Lopez stated that while organizing NAVARRO'S townhome, he has found missing checks from the Jorge Mas Canosa Freedom Foundation, lost keys, lost jewelry, clothes, and misplaced gift cards. He would call to check the remaining balances on the gift cards he found. Gift cards with no remaining balance would be discarded. Mr. Lopez would then provide what he found to NAVARRO'S mother, Zoila Luperon, who was always present while he organized things for NAVARRO. According to Mr. Lopez, he made approximately 15 or so inquiries concerning NAVARRO'S gift cards on his

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personal phone and his business phone. Mr. Lopez denied ever keeping any of the gift cards. Subpoenaed records from Blackhawk Network showed that Mr. Lopez used both his personal phone number and business phone numbers to check the balances on NAVARRO'S gift cards approximately 98 times.

According to Mr. Lopez, he has accompanied NAVARRO while shopping for personal items at Walmart, Home Depot, and Trader Joe's. At Home Depot, NAVARRO purchased cleaning supplies, light bulbs, locks, orchids, and garden items. Mr. Lopez also recalled NAVARRO having purchased a new refrigerator for the kitchen in 2022. He does not recall which credit card NAVARRO used to pay for her items.

Mr. Lopez acknowledged knowing M.D. as having had a dating relationship with NAVARRO. He has met M.D. about three or four times. According to Mr. Lopez, NAVARRO explained to him that she was in love with M.D., but their relationship would not last due to his religion. Mr. Lopez stated on one occasion in June or July of 2022, M.D.'s car broke down on Sheridan Street near his business. NAVARRO was in Israel at the time but called Mr. Lopez and asked him to assist M.D. with his vehicle. On another occasion, NAVARRO asked Mr. Lopez to help M.D. with a remodeling project at M.D.'s juice and sandwich business, Shook Market. Mr. Lopez assisted M.D. in installing artificial lawn and rocks to the outside of the business where the chairs and tables are located. NAVARRO would pay Mr. Lopez for his assistance on all these occasions. Mr. Lopez further added that NAVARRO told him she had purchased items such as clothing and shoes for M.D.

Mr. Lopez described a meeting he had with M.D. and one of M.D.'s friends to discuss mediation between M.D. and NAVARRO. NAVARRO was not at the meeting. During that meeting, Mr. Lopez promised M.D. that he would stop NAVARRO from continuing to follow and harass him.⁴ Mr. Lopez explained that despite their conflicts, they still managed to take a trip to Las Vegas. Mr. Lopez stated NAVARRO showed him photos of herself and M.D. while in Las Vegas. Based on the photos and what she had told him about the trip, Mr. Lopez assumed NAVARRO had paid for the trip.

⁴ The nature of NAVARRO'S and M.D.'s relationship will be explained further in a section discussing "M.D.'s statement."

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UNAUTHORIZED P-CARD PURCHASES

On February 8, 2023, your Affiant sent subpoenas to BrandsMart USA, InComm Financial Services, Blackhawk Network, Home Depot, Office Max/Office Depot, Staples, Sprint/T-Mobile, Walmart, and Apple Inc. The substance for each subpoena was obtained directly from NAVARRO'S P-Card bank statements reflecting transactions conducted between January 1, 2022, through December 31, 2022. As part of each subpoena, video and still photographs of the individual making each purchase were also requested.

Your Affiants have laid out unauthorized P-Card usage by store. When providing total amounts, your Affiants have included taxes and gift card activation fees, when charged.

WALMART PURCHASES

On February 14, 2023, your Affiant received the subpoena response from Walmart. According to the documents received, NAVARRO made frequent purchases from various Walmart locations in Miami-Dade County, Broward County, and Washington, D.C. Your Affiants discovered that NAVARRO made unauthorized purchases from Walmart stores totaling **\$26,404.19**. Also included are still photographs of NAVARRO at various cash registers obtained from in-store security videos dated November 26, 2022, through December 27, 2022. No other photographs or videos were available as they were past the retention period. None of the items purchased by NAVARRO from Walmart are consistent with School Board-approved or school-related activities that benefit District 7 or serve a valid and proper public purpose. None of the listed items were returned to M-DCPS by NAVARRO upon her resignation.

NAVARRO made routine prohibited "split transactions" on purchases. On two occasions, NAVARRO made two separate trips to Walmart stores on the same day, also making split transactions. Your Affiants have broken down the Walmart transactions by month in order to summarize the unauthorized spending.

- **FEBRUARY 2022 (TOTAL AMOUNT SPENT \$531.79)**: On February 26, 2022, NAVARRO visited a Walmart store and purchased unauthorized items using her P-Card totaling \$531.79. The items purchased included an Apple Watch Series 7, an Apple Air Tag, and a Sony Boom Box.

- **APRIL 2022 (TOTAL AMOUNT SPENT \$353.78):**
 - On April 29, 2022, NAVARRO visited a Walmart store and made two separate transactions using her P-Card totaling \$353.78.
 - In the first transaction, she purchased electronic items, including an Apple phone charger, Apple Air Tag Loop, four (4) Apple Air Tags, totaling \$154.59.
 - In the second transaction, NAVARRO purchased unauthorized items such as personal hygiene items, including but not limited to, deodorant, soap, toothpaste, mouthwash, and general grocery items, including but not limited to cereal, yogurt, lemonade, strawberries, and gum, totaling \$199.19.
- **MAY 2022 (TOTAL AMOUNT SPENT \$36.50):** On May 6, 2022, NAVARRO visited a Walmart store and purchased unauthorized food items, including 15 mini peach pies, 56 mini lemon pies, and 2 mini cinnamon cakes, using her P-Card totaling \$36.50.
- **JUNE 2022 (TOTAL AMOUNT SPENT \$4,167.81):**
 - On June 5, 2022, NAVARRO visited a Walmart store and purchased unauthorized clothing, food items, and other miscellaneous items, including but not limited to, a \$200.00 gift card and a \$155.00 fire and water resistant safe with digital keypad lock, using her P-Card totaling \$483.44.
 - On June 9, 2022, NAVARRO visited a Walmart store and purchased unauthorized beauty products, personal hygiene products, food, household cleaning items, and miscellaneous items, including but not limited to, a \$100.00 gift card, a \$237.00 electric burner/griddle, and a stainless-steel spatula griddle set, using her P-Card totaling \$471.56.
 - On June 11, 2022, NAVARRO visited a Walmart store and purchased two (2) unauthorized Visa gift cards in the amounts of \$300.00 and \$200.00, using her P-Card totaling \$509.88.
 - On June 17, 2022, NAVARRO visited a Walmart store in Dania Beach, Florida and purchased unauthorized food, beverage, grocery and miscellaneous items, including but not limited to, two (2) bottles of wine and a \$350.00 Visa gift card, using her P-Card totaling \$465.94.

- On June 22, 2022, NAVARRO visited a Walmart store and made two separate transactions using her P-Card totaling \$888.22.
 - In the first transaction, she purchased an unauthorized \$500.00 Visa gift card, totaling \$504.94.
 - In the second transaction, she purchased unauthorized items including a \$350.00 Visa gift card, various electronic charging cables, a pack of mints, and a package of strawberries, totaling \$383.28.
- On June 30, 2022, NAVARRO visited a Walmart store and made three separate transactions, minutes apart, using her P-Card totaling \$1,348.77.
 - In the first transaction, she purchased unauthorized items such as a \$400.00 Visa gift card, a \$300.00 Visa gift card, several grocery items, and fresh flowers, totaling \$849.06.
 - In the second transaction, she purchased unauthorized items including a \$250.00 Visa gift card and a \$200.00 Visa gift card, totaling \$459.88.
 - In the third transaction, she purchased unauthorized items including a \$25.00 Starbucks gift card, and fourth of July themed dessert plates, totaling \$39.83.
- **JULY 2022 (TOTAL AMOUNT SPENT \$1,138.29):**
 - On July 1, 2022, NAVARRO visited a Walmart store and purchased unauthorized items, including but not limited to, beach towels, personal hygiene products, cigarette lighters, clothing, beverages, a \$94.00 HP printer, and other electronic items, using her P-Card totaling \$360.60.
 - On July 8, 2022, NAVARRO visited a Walmart store and made two separate transactions, minutes apart, using her P-Card totaling \$777.69.
 - In the first transaction, she purchased unauthorized items, including a \$350.00 Visa gift card, fresh fruit, batteries, four pairs of running shorts, a tank top, and batteries, totaling \$422.75.
 - In the second transaction, she purchased an unauthorized \$350.00 Visa gift card, totaling \$354.94.

- **AUGUST 2022 (TOTAL AMOUNT SPENT \$6,277.66):**
 - On August 6, 2022, NAVARRO visited a Walmart store and made four (4) split transactions using her P-Card totaling \$1,685.77.
 - In the first transaction, NAVARRO purchased several unauthorized items, including but not limited to, bras, infant onesies, beauty/hygiene products, and food, totaling \$175.89.
 - In the second transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card totaling \$504.94.
 - In the third transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card totaling \$504.94.
 - In the fourth transaction, NAVARRO purchased an unauthorized Disney gift card totaling \$500.00.
 - On August 20, 2022, NAVARRO visited a Walmart store and made three (3) split transactions, minutes apart, using her P-Card totaling \$1,704.88.
 - In the first transaction, NAVARRO purchased unauthorized items, including a \$500.00 Visa gift card and two jugs of lemonade, totaling \$513.94.
 - In the second transaction, NAVARRO purchased unauthorized items, including a \$500.00 Visa gift card, a \$200.00 Visa gift card, wet wipes and a finger splint, totaling \$716.00.
 - In the third transaction, NAVARRO purchased an unauthorized \$470.00 Visa gift card, totaling \$474.94.
 - On August 31, 2022, NAVARRO visited a Walmart store and made five (5) split transactions, minutes apart, using her P-Card totaling \$2,887.01. In every transaction, NAVARRO purchased at least one \$500.00 gift card.
 - In the first transaction, NAVARRO purchased an unauthorized \$500.00 gift card, totaling \$504.94.
 - In the second transaction, NAVARRO purchased unauthorized items, including but not limited to, a \$500.00 Visa gift card, deodorant, makeup, hair coloring, skin care products, wet wipes, and a packaged salad, totaling \$599.81.

- In the third transaction, NAVARRO purchased unauthorized items including but not limited to, a \$500.00 Visa gift card, shaving cream, fresh fruit, a Miss Riding Hood female adult Halloween costume, and two (2) pairs of jeans, totaling \$571.75
 - In the fourth transaction, NAVARRO purchased unauthorized items including a \$500.00 Visa gift card, jeans, a camisole, a Pirate Vixen female adult Halloween costume, totaling \$560.51.
 - In the fifth transaction, NAVARRO purchased unauthorized gift cards, a \$150.00 Outback gift card and a \$500.00 Disney gift card, totaling \$650.00.
- **SEPTEMBER 2022 (TOTAL AMOUNT SPENT \$1,778.75):**
 - On September 19, 2022, NAVARRO visited a Walmart store and purchased an unauthorized \$500.00 Visa gift card, using her P-Card totaling \$504.94.
 - On September 20, 2022, NAVARRO visited a Walmart store in Washington, D.C., and made two (2) split transactions, minutes apart, using her P-Card totaling \$1,273.81.
 - In the first transaction, NAVARRO purchased unauthorized items, including a \$500.00 Visa gift card, a \$50.00 Outback Steakhouse gift card, a \$109.00 luggage, 2 luggage tags, and 3 luggage locks, totaling \$689.43.
 - In the second transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card, and 3 pieces of clothing, totaling \$584.38.
- **OCTOBER 2022 (TOTAL AMOUNT SPENT \$657.58):** On October 9, 2022, NAVARRO visited a Walmart store and purchased unauthorized items using her P-Card totaling \$657.58. These items included but are not limited to, a \$500.00 Visa gift card, flowers, five (5) Halloween costumes/accessories, six (6) cartons of eggs, cheese, mints, croquettes, and other miscellaneous items.
- **NOVEMBER 2022 (TOTAL AMOUNT SPENT \$5,033.27):**
 - On November 4, 2022, NAVARRO visited a Walmart store and made two (2) split transactions using her P-Card totaling \$911.30.
 - In the first transaction, NAVARRO purchased seventy-eight (78) household items/groceries and other miscellaneous items, including but not limited to

- two (2) bottles of wine, a 10x10 canopy, and two (2) folding chairs, totaling \$406.36.
- In the second transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card, totaling \$504.94.
- On November 5, 2022, NAVARRO visited a Walmart store and made two (2) split transactions, seconds apart, using her P-Card totaling \$620.53.
- In the first transaction, NAVARRO purchased forty (40) unauthorized food, beverage and other miscellaneous grocery items, totaling \$115.59.
 - In the second transaction, NAVARRO purchased a \$500 Visa gift card totaling \$504.94.
- On November 9, 2022, NAVARRO visited a Walmart store and purchased unauthorized items using her P-Card totaling \$754.28. These items included but are not limited to, a \$500.00 Visa gift card, a \$50.00 Mastercard gift card, several air fresheners, yogurts, candy, beverages, batteries, and disinfectant sprays.
- On November 20, 2022, NAVARRO visited a Walmart store and made two (2) split transactions, minutes apart, using her P-Card totaling \$1,119.74.
- In the first transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card totaling \$504.94.
 - In the second transaction, NAVARRO purchased unauthorized items including but not limited to a \$250.00 Visa gift card, three (3) bottles of wine, air fresheners, mouthwash, toothbrush, PJ set, underwear, and other clothing and household items, totaling \$614.80.
- On November 25, 2022, NAVARRO visited a Walmart store and made two (2) split transactions, minutes apart, using her P-Card totaling \$959.48.
- In the first transaction, NAVARRO purchased unauthorized electronic items and accessories such as a \$288.00 LG 43-inch smart TV, a 4-pack of Apple AirTags, and an Apple AirTag Leather key ring, totaling \$451.54.
 - In the second transaction, NAVARRO purchased unauthorized grocery/personal items, electronics, and clothing, including but not limited to, a \$79.00 Keurig coffee maker, two (2) \$55.00 Keurig coffee makers, wine, baby formula, and diapers, totaling \$507.94.

- On November 26, 2022, NAVARRO visited a Walmart store and purchased unauthorized items using her P-Card totaling \$473.87. The items included, but are not limited to, a \$99.00 Barista Pro 6-in-1 Espresso Machine with Milk Frother, a \$157.00 two door mini fridge with freezer, several storage containers, pillows, baby formula, tablecloths, and other food items. It should be noted that NAVARRO can be seen on Walmart in-store security surveillance video completing this transaction.
- On November 30, 2022, visited a Walmart store and made two (2) split transactions, minutes apart, using her P-Card totaling \$194.07. NAVARRO can be seen on Walmart in-store security surveillance video purchasing the below described items. See below for still frame photographs.
 - In the first transaction, NAVARRO purchased unauthorized items including electronic accessories, food items, mints, clothing and poinsettia plants, totaling \$128.43
 - In the second transaction, NAVARRO purchased unauthorized items, including three (3) bottles of wine, cleaning products, and bananas, totaling \$65.64.



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- **DECEMBER 2022 (TOTAL AMOUNT SPENT \$6,428.76):**

- On December 3, 2022, NAVARRO visited a Walmart store and made two (2) split transactions using her P-Card totaling \$862.91. Again, NAVARRO can be seen on Walmart in-store security surveillance video purchasing the below described items. See below for still frame photographs.
 - In the first transaction, NAVARRO purchased unauthorized gift cards, a \$500.00 Visa gift card, and a \$50.00 Starbucks gift card, totaling \$554.94.
 - In the second transaction, NAVARRO purchased unauthorized items, including but not limited to, household cleaning items, personal hygiene products, cases of water, food, beverages, air fresheners, Christmas decorations, and several wooden diploma picture frames, totaling \$307.97.



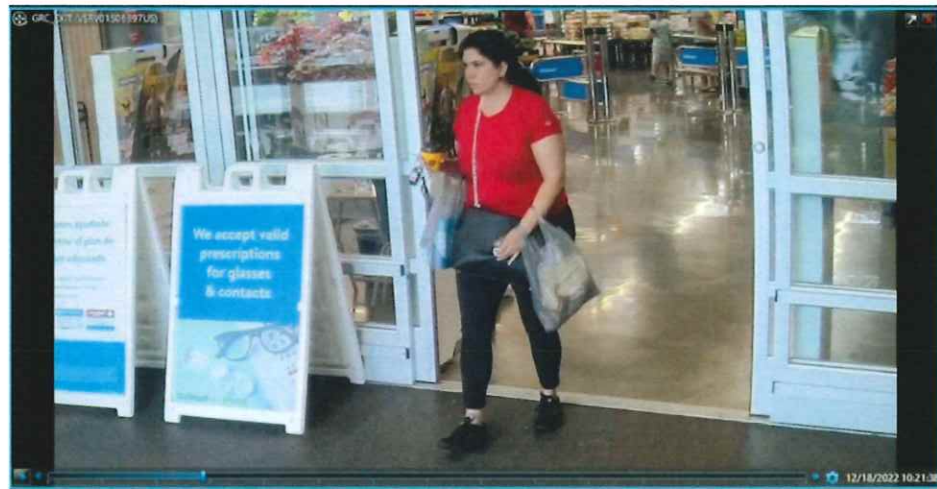
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- On December 9, 2022, NAVARRO visited two Walmart locations that day. Around 2:00 pm, NAVARRO made two transactions minutes apart at a Walmart in Dania Beach, Florida, totaling \$804.74. Later in the day, NAVARRO made a third transaction at a Walmart in Miami, Florida at approximately 9:27 pm for \$308.21. On December 9, 2022, NAVARRO spent a total of \$1,112.95 at Walmart for all three transactions.
 - In the first Dania Beach transaction, NAVARRO purchased 48 unauthorized items, including household cleaning items, Christmas cards, peppermint candy canes, food items, a slow cooker, New Year’s Eve party supplies and accessories, and other miscellaneous items, totaling \$195.28.
 - In the second Dania Beach transaction, NAVARRO purchased a \$500.00 Visa gift card and 17 tubs of popcorn, totaling \$609.46.
 - In the Miami transaction later that day, NAVARRO returned to Walmart and purchased unauthorized items, including 11 bottles of wine, food items, holiday gift paper, clothing, water, and other miscellaneous items, totaling \$308.21. NAVARRO can be seen on Walmart in-store security surveillance video in the Miami store purchasing the above-described items. See below for still frame photographs.



- On December 18, 2022, NAVARRO visited a Walmart store and made three (3) split transactions, minutes apart, using her P-Card totaling \$1,470.63. NAVARRO can be seen on Walmart in-store security surveillance video store purchasing the below-described items. See below for still frame photographs.
 - In the first transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card totaling \$506.92.
 - In the second transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card totaling \$504.94.
 - In the third transaction, NAVARRO purchased unauthorized items, including a \$425.00 Visa gift card and three (3) deodorants, totaling \$458.77.



- On December 23, 2022, NAVARRO visited a Walmart store and made three (3) split transactions, minutes apart, using her P-Card totaling \$1,396.81. NAVARRO can be seen on Walmart in-store security surveillance video purchasing the below-described items. See below for still frame photographs.
 - In the first transaction, NAVARRO purchased unauthorized items, including but not limited to, a \$200.00 Cheesecake Factory gift card, kitchen towels, duct tape, fresh flowers, tote boxes, beverages, plastic party cups, chocolates, household cleaning supplies, and a Hanukkah Menorah, totaling \$381.35.
 - In the second transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card and a bottle of water, totaling \$506.92.

- In the third transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card and two packs of Ferrero Rocher chocolates, totaling \$508.54.



- On December 24, 2022, NAVARRO visited a Miami Walmart store twice on the same day, approximately four (4) hours apart, and made two transactions using her P-Card totaling \$781.24. In both instances, NAVARRO can be seen on Walmart in-store security surveillance video purchasing the below-described items. See below for still frame photographs.

- In the first transaction, NAVARRO purchased unauthorized items, including but not limited to, a \$300.00 Disney gift card, ten (10) bottles of wine, batteries, fresh food, beverages, baby toy, foldable table, clothing, and other miscellaneous items, totaling \$646.66.

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Co-Affiant's Initials *[Signature]*

- In the second transaction later that day, NAVARRO purchased unauthorized items, including but not limited to, batteries, dessert toppings, air fresheners, food, and miscellaneous household items, totaling \$134.58.



- On December 27, 2022, NAVARRO visited a Walmart store and made two (2) split transactions, minutes apart, using her P-Card totaling \$804.22. NAVARRO can be seen on Walmart in-store security surveillance video purchasing the below-described items. See below for still frame photographs.
 - In the first transaction, NAVARRO purchased an unauthorized \$500.00 Visa gift card and a bottle of water totaling \$506.82.
 - In the second transaction, NAVARRO purchased fifty-two (52) unauthorized items, including but not limited to, food, hair coloring, adult

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underwear, personal hygiene products, New Year's party supplies/accessories, a rice cooker, and tote boxes, totaling \$297.40.



STAPLES PURCHASES

On February 21, 2023, your Affiant received a subpoenaed response from Staples. According to the documents and video received, NAVARRO made frequent purchases from three different Staples locations in Miami-Dade County and Broward County totaling \$11,662.47. Since there is a possibility that many items purchased at Staples could be considered school related, your Affiants are only taking into account the unauthorized purchases of gift cards and other obvious unauthorized items purchased from Staples stores totaling **\$9,335.86**. On June 8, 2023, your Affiant received subpoenaed documents from Blackhawk Network, the issuer of these gift cards. The documents from Blackhawk Network independently corroborated that the gift cards purchased

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from Staples were bought with NAVARRO'S P-Card. The gift card serial numbers and dollar amounts also matched those from the Staples receipts. As previously described, gift cards are not M-DCPS approved purchases. Your Affiants have broken down the Staples transactions by month in order to summarize the unauthorized spending.

- **JANUARY 2022 (UNAUTHORIZED AMOUNT SPENT \$13.98):** On January 1, 2022, NAVARRO visited a Staples store and purchased unauthorized items using her P-Card including coffee and paper cups totaling \$13.98.
- **FEBRUARY 2022 (UNAUTHORIZED AMOUNT SPENT \$1,639.70):**
 - On February 2, 2022, NAVARRO visited a Staples store and made unauthorized purchases using her P-Card, including two (2) \$200.00 Visa gift cards, and one (1) \$100.00 Visa gift card, totaling \$519.85.
 - On February 12, 2022, NAVARRO visited a Staples store and made two (2) split transactions, minutes apart, using her P-Card with unauthorized purchases totaling \$705.95.
 - In the first transaction, NAVARRO made unauthorized purchases of two (2) \$200.00 Mastercard gift cards, and one (1) \$100.00 Mastercard gift card, totaling \$505.95.
 - In the second transaction, NAVARRO made an unauthorized purchase of a \$200.00 Mastercard gift card, totaling \$200.00 (there was no activation fee for this gift card).
 - On February 20, 2022, NAVARRO visited a Staples store and made unauthorized purchases of two (2) \$200.00 Visa gift cards, totaling \$413.90.
- **MARCH 2022 (UNAUTHORIZED AMOUNT SPENT \$3,343.82):**
 - On March 9, 2022, NAVARRO visited a Staples store and made two (2) split transactions, minutes apart, using her P-Card with unauthorized purchases totaling \$879.00.
 - In the first transaction, NAVARRO made unauthorized purchases of two (2) \$200.00 Nordstrom gift cards, totaling \$400.00 (there was no activation fee for these gift cards).

- In the second transaction, NAVARRO made unauthorized purchases of two (2) \$200.00 Nordstrom gift cards and a \$79.00 Apple Macbook computer charger, totaling \$479.00.
 - On March 12, 2022, NAVARRO visited a Staples store and made three (3) split transactions, minutes apart, using her P-Card with unauthorized purchases totaling \$1,711.39.
 - In the first transaction, NAVARRO made unauthorized purchases of two (2) \$200.00 Nordstrom gift cards, two (2) \$59.99 Ring Indoor Cameras, and \$129.99 Mobile File Ottoman, totaling \$649.97.
 - In the second transaction, NAVARRO made unauthorized purchases of a Kenneth Cole Laptop Briefcase and a glass monitor riser, totaling \$104.84.
 - In the third transaction, NAVARRO made unauthorized purchases of two (2) \$200.00 Nordstrom gift cards, three (3) \$50.00 Nordstrom gift cards, a \$179.99 Nest Doorbell Battery, and a \$199.99 HP Display Monitor, totaling \$956.58.
 - On March 19, 2022, NAVARRO visited a Staples store and made unauthorized purchases of three (3) \$200.00 Visa gift cards, a \$129.99 paper shredder, and a bottle of water, totaling \$753.43.
- **APRIL 2022 (UNAUTHORIZED AMOUNT SPENT \$620.85):** On April 19, 2022, NAVARRO visited a Staples store and made unauthorized purchases of three (3) \$200.00 Visa gift cards, totaling \$620.85.
- **MAY 2022 (UNAUTHORIZED AMOUNT SPENT \$829.93):**
 - On May 7, 2022, NAVARRO visited a Staples store and made two (2) split transactions, minutes apart, using her P-Card with unauthorized purchases totaling \$829.93.
 - In the first transaction, NAVARRO purchased files and other items that could be considered school-related; therefore, the total amount spent for this transaction is not included.
 - In the second transaction, NAVARRO made unauthorized purchases of two (2) \$200.00 Visa gift cards, one (1) \$100.00 Visa gift card, four (4) \$50.00




Darden Restaurant gift cards, two (2) \$50.00 Cheesecake Factory gift cards, a bottle of water, Tylenol, and Altoids, totaling \$829.93.

• **JUNE 2022 (UNAUTHORIZED AMOUNT SPENT \$1,548.24):**

- On June 1, 2022, NAVARRO visited a Staples store and made unauthorized purchases of two (2) \$200.00 Visa gift cards and paper cups, totaling \$420.89.
- On June 17, 2022, NAVARRO visited a Staples store and made two (2) split transactions, minutes apart, using her P-Card with unauthorized purchases totaling \$706.46.
 - In the first transaction, NAVARRO made unauthorized purchases of a \$59.99 Google Nest Hub (smart home/touch screen device), an AirTag keychain, a bottle of water, and a glass monitor riser, totaling \$106.46.
 - In the second transaction, a minute later, NAVARRO made unauthorized purchases of three (3) \$200.00 Visa gift cards, totaling \$600.00.
- On June 29, 2022, NAVARRO visited a Staples store and made unauthorized purchases of two (2) \$200.00 Visa gift cards and Aveeno body lotion, totaling \$420.89.

• **JULY 2022 (UNAUTHORIZED AMOUNT SPENT \$952.67):**

- On July 8, 2022, NAVARRO visited a Staples store and made two (2) split transactions, minutes apart, using her P-Card with unauthorized purchases totaling \$952.67.
 - In the first transaction, NAVARRO made unauthorized purchases of three (3) \$200.00 Visa gift cards, a \$52.46 Polaroid Waterproof Digital Camera, a \$49.99 Vivitar Selfie Camera with Preview Screen, a \$5.99 hard case for Vivitar Selfie Camera, a \$63.46 digital picture frame, a \$24.99 Samsonite Power Adapter/Converter, an \$11.99 Samsonite Universal Worldwide Global Travel Power Adapter, and an \$16.99 Travelon Universal A/C Adapter Set, totaling \$846.72. It should be noted that NAVARRO traveled outside the country on August 7, 2022, which will be discussed further in this warrant.
 - In the second transaction, NAVARRO made an unauthorized purchase a \$100.00 Visa gift card, totaling \$105.95.




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- **DECEMBER 2022 (UNAUTHORIZED AMOUNT SPENT \$386.67)**: On December 29, 2022, NAVARRO visited a Staples store and made unauthorized purchases, including one (1) \$200.00 Visa gift card, one (1) \$50.00 Visa gift card, a \$99.00 Apple HomePod mini-Bluetooth speaker, sugar, and creamer, totaling \$386.67.

OFFICE DEPOT/OFFICE MAX PURCHASES

On March 6, 2023, your Affiant received the subpoenaed response from Office Depot/OfficeMax. Office Depot and Office Max merged, and Office Max is a brand and subsidiary of Office Depot. They should be considered one and the same for purposes of this warrant as there is no differentiation on the receipts received by your Affiants via subpoena. According to the Office Depot/Office Max receipts, NAVARRO made frequent unauthorized purchases from eight (8) different Office Depot/OfficeMax locations in Miami-Dade County, Broward County, Tallahassee, and Washington, D.C. totaling \$24,388.54. Since there is a possibility that many items purchased from Office Depot/Office Max could be considered school related, your Affiants only took into account the unauthorized purchases of gift cards and other obvious unauthorized items purchased by NAVARRO using her P-Card, totaling **\$19,270.89**. Along with non-authorized purchases, NAVARRO also made numerous purchases of gift cards. None of the purchases made by NAVARRO appear to be in connection with School Board-approved or school-related activities that benefit District 7 and serve a valid and proper public purpose. All purchases made by NAVARRO at Office Depot/OfficeMax have been verified against her bank statements. On June 8, 2023, your Affiant received subpoenaed documents from Blackhawk Network, the issuer of these gift cards. The documents from Blackhawk confirm each of these gift card purchases.

- **JANUARY 2022 (UNAUTHORIZED AMOUNT SPENT \$732.39)**:
 - On January 15, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Miami, Florida, using her P-Card for a \$200.00 Visa gift card, and a \$100 Visa gift card, totaling \$312.90.
 - On January 22, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Miami, Florida, using her P-Card for two (2) \$200.00 Visa gift cards and insulated hot paper cups, totaling \$419.49.

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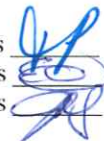
- **FEBRUARY 2022 (UNAUTHORIZED AMOUNT SPENT \$986.52):**
 - On February 3, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Tallahassee, Florida, using her P-Card for two (2) \$200.00 Visa gift cards, and a \$100.00 Visa gift card, totaling \$519.85.
 - On February 28, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Miami, Florida, using her P-Card for two (2) \$200.00 Visa gift cards, napkins, and a pack of Advil pain killer, totaling \$466.67.
- **MARCH 2022 (UNAUTHORIZED AMOUNT SPENT \$1,869.98):**
 - On March 6, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in North Miami, Florida, using her P-Card for two (2) \$200.00 Visa gift cards, and a \$100.00 Visa gift card, totaling \$504.85.
 - On March 13, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Miami, Florida, using her P-Card for two (2) \$200.00 Visa gift cards, a Square credit card reader, and lock combination, totaling \$431.38.
 - On March 19, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Miami, Florida, using her P-Card for three (3) \$200.00 Visa gift cards, totaling \$620.85.
 - On March 21, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Hollywood, Florida, using her P-Card for a \$200.00 Visa gift card and a \$100 Visa gift card, totaling \$312.90.
- **APRIL 2022 (UNAUTHORIZED AMOUNT SPENT \$1,653.47):**
 - On April 12, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Hollywood, Florida, using her P-Card for three (3) \$200.00 Visa gift cards, mesh Apple watchband, Listerine Breath Strips, and Wrigley's Gum, totaling \$618.72.
 - On April 18, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Hollywood, Florida, using her P-Card for two (2) \$200.00 Visa gift cards, totaling \$413.90.
 - On April 23, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Miami, Florida, using her P-Card for three (3) \$200.00 Visa gift cards, totaling \$620.85.

• **MAY 2022 (UNAUTHORIZED AMOUNT SPENT \$1,912.65):**

- On May 9, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Miami, Florida, using her P-Card for three (3) \$200.00 Visa gift cards and an Extra Strength Tylenol, and Vicks Dayquil, totaling \$649.33.
- On May 10, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Hollywood, Florida, using her P-Card for three (3) \$200.00 Visa gift cards and two (2) chocolate bars, totaling \$621.33.
- On May 19, 2022, NAVARRO made an unauthorized purchase at Office Depot/Office Max in Miami, Florida, using her P-Card for an HP Laptop (\$599.99), totaling \$641.99.




• **JUNE 2022 (UNAUTHORIZED AMOUNT SPENT \$3,434.07):**

- On June 1, 2022, NAVARRO made unauthorized split transactions, minutes apart, at Office Depot/Office Max in Miami, Florida, using her P-Card, totaling \$1,676.39.
 - In the first transaction, NAVARRO purchased two (2) \$300.00 Disney gift cards and a \$200.00 Visa gift card, totaling \$806.95.
 - In the second transaction, NAVARRO purchased an HP Pavillion X360 laptop (\$599.99) with two-year warranty (\$139.99), laptop briefcase and laptop sleeve, totaling \$869.44.
- On June 3, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Hollywood, Florida, using her P-Card for three (3) \$200.00 Visa gift cards, a \$50 Outback gift card, coffee cups, a birthday card and gum, totaling \$686.62.
- On June 14, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Hollywood, Florida, using her P-Card for two (2) \$200.00 Visa gift cards and Listerine breath strips, totaling \$401.69.
- On June 17, 2022, NAVARRO made unauthorized split transactions, minutes apart, at Office Depot/Office Max in Hollywood, Florida, using her P-Card, totaling \$669.37
 - In the first transaction, NAVARRO purchased three (3) packs of Tide laundry detergent, a Tide to go pen, and two (2) packs of sparkling water, totaling \$55.47.



- In the second transaction, NAVARRO purchased two (2) \$200.00 Visa gift cards, and a \$200 Cheesecake Factory gift card, totaling \$613.90.
- **JULY 2022 (UNAUTHORIZED AMOUNT SPENT \$1,293.05):**
 - On July 6, 2022, NAVARRO made two unauthorized split transactions, minutes apart, at Office Depot/Office Max in Hollywood, Florida using her P-Card, totaling \$1,293.05.
 - In the first transaction, NAVARRO purchased four (4) \$200.00 Visa gift cards, USB power cables, and Listerine breath strips, totaling \$878.15.
 - In the second transaction, NAVARRO purchased two (2) more \$200.00 Visa gift cards, totaling \$414.90.
- **AUGUST 2022 (UNAUTHORIZED AMOUNT SPENT \$2,337.05):**
 - On August 5, 2022, NAVARRO made two unauthorized split transactions, minutes apart, at Office Depot/Office Max in Hollywood, Florida, using her P-Card, totaling \$902.77.
 - In the first transaction, NAVARRO purchased two (2) \$200.00 Visa gift cards,⁵ Tide fabric spray, and Tide to go, totaling \$394.88.
 - In the second transaction, NAVARRO purchased a \$500.00 Disney gift card and paper coffee cups, totaling \$507.89.
 - On August 12, 2022, NAVARRO made two unauthorized split transactions, minutes apart, at Office Depot/Office Max in Hollywood, Florida, using her P-Card totaling \$1,434.28.
 - In the first transaction, NAVARRO purchased a \$500.00 Disney gift card, a \$200.00 Visa gift card, Advil tablets, and a Tide to go, totaling \$726.48.
 - In the second transaction, NAVARRO purchased three (3) \$200 Visa gift cards and a \$100.00 Visa gift card, totaling \$707.80.
- **SEPTEMBER 2022 (UNAUTHORIZED AMOUNT SPENT \$1,275.00):**
 - On September 19, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Washington, D.C., using her P-Card for a \$500.00 Nordstrom

⁵ During this transaction, NAVARRO used a coupon for the gift cards and was charged \$192.50 for each \$200 gift card.

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gift card and a \$25.00 Mastercard gift card, totaling \$525.00. It should be noted that your Affiant received documents from American Airlines showing that NAVARRO traveled to Washington, D.C. the very day these purchases were made.

- On September 23, 2022, NAVARRO made unauthorized purchases at Office Depot/Office Max in Hollywood, Florida, using her P-Card for three (3) \$200.00 Visa gift cards and a \$150.00 Visa gift card, totaling \$750.00.

- **OCTOBER 2022 (UNAUTHORIZED AMOUNT SPENT \$2,226.71):**

- On October 5, 2022, NAVARRO made two unauthorized split transactions, minutes apart, at Office Depot/Office Max in Hollywood, Florida, using her P-Card, totaling \$1,088.08.
 - In the first transaction, NAVARRO purchased two (2) \$200.00 Bloomingdales gift cards, a work mate briefcase (\$199.99), and Orbit gum, totaling \$602.18.
 - In the second transaction, two minutes later, NAVARRO purchased two (2) \$200.00 Visa gift cards and US postage stamps (\$72), totaling \$485.90.
- On October 7, 2022, NAVARRO made two unauthorized split transactions at Office Depot/Office Max in Hollywood, Florida, using her P-Card, totaling \$1,138.63
 - In the first transaction, NAVARRO purchased an HP Printer (\$199.99), Charmin toilet paper (\$63.78), Acrylic gold calculator (\$28.99), Tide laundry detergent, and a decorative mouse pad, totaling \$324.73.
 - In the second transaction, according to BlackHawk records and P-Card bank statements, NAVARRO purchased two (2) \$200 Visa gift cards and two (2) \$200 Bloomingdale's gift cards, totaling \$813.90.

- **NOVEMBER 2022 (UNAUTHORIZED AMOUNT SPENT \$950.00):**

- On November 5, 2022, according to BlackHawk records and P-Card bank statements, NAVARRO made unauthorized purchases at Office Depot/Office Max in Sunrise, Florida, using her P-Card for two (2) \$200 Visa gift cards and a \$100 Victoria's Secret PINK gift card, totaling \$500.00.
- On November 7, 2022, according to BlackHawk records and P-Card bank statements, NAVARRO made unauthorized purchases at Office Depot/Office Max



in Pinecrest, Florida, using her P-Card for two (2) \$200 Visa gift cards and one \$50 Outback Restaurant gift cards, totaling \$450.00.

- **DECEMBER 2022 (UNAUTHORIZED AMOUNT SPENT \$600.00)**: On December 2, 2022, according to BlackHawk records and P-Card bank statements, NAVARRO made unauthorized purchases at Office Depot/Office Max in Hollywood, Florida for three (3) \$200 Visa gift cards, totaling \$600.00.

STORES WHERE GIFT CARDS WERE REDEEMED

As explained above, NAVARRO purchased numerous Visa and Mastercard gift cards using her P-Card from Walmart, Staples and Office Depot/Office Max. Your Affiant received records from BlackHawk Network and InComm Financial Services, Inc., companies that service the gift cards purchased by NAVARRO, and found that the majority of gift cards were partially or fully redeemed at the following stores from January 2022 to January 2023⁶: Ideal Baby & Kids, Bloomingdale's Outlet, Swarovski, El Dorado Outlet, Bozkurt Jewelry, Miami Grill, Jersey Mike's, Café El Renacer, Ross Stores, Giardino Gourmet Salads, Miller's Ale House, Macy's Dadeland, CVS Pharmacy, Champs, Burlington Stores (Tallahassee, Florida), Aldo, Saks Off Fifth, Pollo Tropical, BHM Café, Panera Bread, Fresco y Mas, Aldi, Tail Wind TLH (Tallahassee, Florida), Moulin Rose Cake & Bakery, Smoothie King, Party City, Cuban Guys Sandwiches, JC Penney, Nordstrom Rack, Hunan Wok Sheridan, Aventura D-Lites, Bonefish Grill, Publix (Tallahassee, Florida), Nothing Bundt Cakes, Footlocker, Saks Fifth Avenue, Cali Coffee (Hollywood, Florida), My Big Fat Greek Restaurant, Burger King, Las Vegas Cuban Cuisine, Shell Oil, Publix (Miami, Florida), Adriana Beauty Supply, Chili's, Trader Joe's, RaceTrac, Don Pan, Starbucks, Delices de France, Handy Storage Sixteen, McDonald's, Chipotle, KFC, Ice Box Café, Roadside Assistance, Nordstrom (Washington, D.C.), Saks Off Fifth (Washington, D.C.), SP Hair Accessories, Tous Concourse E (Miami International Airport (M.I.A.)), La Carreta Concourse E (M.I.A.), Aqua Pura Bracelets, Amazon.com, Yaily's Fashion, Walmart, Spencer Gifts, Taco Bell, Shein.com, Victoria's Secret, Sephora, TJ Maxx, HGreg Nissan Kendall, Dayi's Beauty Zone, Miami-Dade PMT & ACI, Costco, Brandy Melville, Subway, Arley Beauty SA, Golden Palace, Chifa Du Kang (Peruvian Restaurant), China Cabinet, 3 Chefs and a Chicken, Five

⁶ Several gift cards purchased using NAVARRO'S P-Card had not yet been redeemed when your Affiant received the subpoenaed records.

Below, Aeropostale.com, Journey's, Nike Inc., BJ's Wholesale, Carrot Express, Mimi's Ravioli, Bath & Body Works, Destination Universal (Orlando, Florida), Moran Patisserie, Chick-fil-a, Casavana, Lucky Beauty Supplies, Buy Buy Baby, Sunset U Gas, Chevron, Instagram.com, 7-Eleven, Wendy's, Florida Power & Light, Gucci (\$1,000), Sergio's Cuban Restaurant, Simply Unique Laser Hair Removal (Fort Lauderdale, Florida), Moran Patisserie, Vicky Bakery, Palace Discount Store, AZA Cosmetic, Party Cake Bakery IV Inc., GHarmony Apparel LLC., Smooth Beets Juice, Sedano's, La Fogata, Government Discount, and Bolay Aventura.

BRANDSMART USA PURCHASES




On February 22, 2023, Your Affiant received a subpoena response from BrandsMart USA (hereinafter, BrandsMart). According to the documents, NAVARRO made frequent unauthorized purchases from two different BrandsMart locations. One located at 10 South Compass Way, Dania Beach, Fl 33044, and the other at 16051 South Dixie Highway, Miami, Fl 33157.

NAVARRO made several purchases in 2022 at the two BrandsMart stores using her P-Card totaling **\$10,966.95**. None of the purchases are in connection with School Board-approved or school-related activities that benefit District 7 and serve a valid and proper public purpose. None of the items purchased were returned by NAVARRO upon her resignation from the School Board. Your Affiants have broken down the BrandsMart transactions by month in order to summarize the unauthorized spending. All receipts contain NAVARRO'S personal information including her name, address, phone number, e-mail address (LUBBY9@BELLSOUTH.NET), and the last four digits of her P-Card number. All purchases made by NAVARRO at BrandsMart have been verified against her bank statements.




- **MAY 2022 (TOTAL AMOUNT SPENT \$2,313.80):**
 - On May 15, 2022, NAVARRO visited a BrandsMart store in Dania Beach, Florida, and made two (2) split transactions, minutes apart, using her P-Card with unauthorized purchases totaling \$995.65.
 - In the first transaction, NAVARRO made unauthorized purchases of a Premium Levella Chest Freezer (\$350.00) with warranty (\$139.88), totaling \$524.17.

- In the second transaction, NAVARRO made unauthorized purchases including a Samsung 40-inch Smart TV (\$218.88), Nespresso Maker (\$199.88), and O-Cedar ProMist Spray Mop (\$22.99), totaling \$471.48.
 - On May 16, 2022, NAVARRO visited a BrandsMart store in Dania Beach, Florida, and made two (2) split transactions, minutes apart, using her P-Card with unauthorized purchases totaling \$1,244.58. About four hours later, NAVARRO went back to the same BrandsMart in Dania Beach and completed a third transaction.
 - In the first transaction, NAVARRO made an unauthorized purchase of a Breville Barista Express coffee maker (\$699.88), totaling \$748.87.
 - In the second transaction, NAVARRO made unauthorized purchases, including a Sony X-Series Waterproof Portable Bluetooth Wireless Party Speaker (\$298.00), Ovente Electric Milk Frother (\$39.00), and a set of mugs with rack, totaling \$371.03.
 - In the third transaction, hours later, NAVARRO made unauthorized purchases, including a Ovente PowerFlow Cool Breeze Pivoting Blower Fan (\$99.88), 6-foot outlet power strip, and two (2) craft bottle openers, totaling \$124.68
 - On May 25, 2022, NAVARRO visited a BrandsMart store in Dania Beach, Florida, and made unauthorized purchases for a DeLonghi Electric Espresso Maker (\$59.88) and a 4-piece IMUSA Espresso cups, totaling \$73.57.
- **JUNE 2022 (TOTAL AMOUNT SPENT \$834.34)**: On June 13, 2022, NAVARRO visited a BrandsMart in Dania Beach, Florida, and purchased unauthorized items using her P-Card including a Breville Barista Express coffee maker (\$699.88) and Kalorik Robot Vacuum (\$79.88), totaling \$834.34.
- **SEPTEMBER 2022 (TOTAL AMOUNT SPENT (\$3,220.61))**:
 - On September 12, 2022, NAVARRO made unauthorized purchases using her P-Card from a BrandsMart in Dania Beach, Florida, including two (2) Ninja blenders (\$109.88), Studio Z entertainment system (\$169.88), digital display picture frame (\$89.88), stuffed Disney Mickey toy (\$24.88) and stuffed Disney Minnie toy (\$24.88), and four (4) bottles of hand sanitizer, totaling \$570.57.

- On September 14, 2022, NAVARRO made two (2) split transactions minutes apart from a BrandsMart store in Dania Beach, Florida, using her P-Card with unauthorized purchases totaling \$734.79.
 - In the first transaction, NAVARRO purchased an Ovente PowerFlow Cool Breeze Pivoting Blower Fan (\$99.88), mattress cover (\$49.88), six (6) Sets of 4 Luminarc 20 Oz Cachet Wine Glasses (\$10.88 each), two (2) Sets of 4 Mikasa Champagne Flute Glasses (\$15.88 each), two (2) Sets of 4 Luminarc 15 Oz Wine Glasses (\$10.88), Cuisinart Sandwich Maker (\$22.88), stuffed Disney Mickey toy (\$24.88), stuffed Disney Minnie toy (\$24.88), and a Power Plaque Remover toothbrush (\$16.88), totaling \$383.15.
 - In the second transaction, NAVARRO purchased an LG 300 Bluetooth Shelf Stereo System (\$148.88), Fitbit Fitness Tracker With Built-in GPS and Heart Rate Monitor (black) (\$139.88), and Fitness Smartwatch with Heart Rate Monitor (pink) (\$39.88), totaling \$351.64.
- On September 16, 2022, NAVARRO made four (4) split transactions minutes apart from a BrandsMart in Dania Beach, Florida using her P-Card with unuauthorized purchases totaling \$1,915.25.
 - In the first transaction, NAVARRO purchased a Premium Levella 12.5 CuFt Commercial Display Refrigerator with warranty totaling \$1,176.87. It should be noted that while the refrigerator appears on one single receipt, the transaction was split into two, for \$853.50 and \$323.37, in order to stay below the M-DCPS requirement for three bids on items above \$999.99.
 - In the second transaction, NAVARRO purchased an Avanti 34 Bottle Wine Chiller totaling \$310.17.
 - In the third transaction, NAVARRO purchased a second Avanti 34 Bottle Wine Chiller totaling \$310.17.
 - In the fourth transaction, NAVARRO purchased two (2) Stainless Steel Strainers, Cuisinart Wine Winged Corkscrew, Mesh Sink Strainer, three (3) Sets of 4 Mikasa Champagne Flute Glasses, Proctor Silex Electric Knife, Fridge Bin Liners, Swivel Peeler, three (3) Wine Pourers, totaling \$118.04.

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 Affiant's Initials 
 Co-Affiant's Initials 

- **OCTOBER 2022 (TOTAL AMOUNT SPENT (\$1,184.55)):**
 - On October 7, 2022, NAVARRO made two (2) split transactions, minutes apart, from a BrandsMart in Dania Beach, Florida using her P-Card with unuauthorized purchases totaling \$1,184.55.
 - In the first transaction, NAVARRO purchased an Oster Digital French Turbo Convection Oven (\$159.88) and other kitchen items of lesser value, totaling \$197.44.
 - In the second transaction, NAVARRO purchased a MacBook Air laptop (\$849.00), a screen cleaning kit, screen cleaner, Mophi universal wireless dual phone charger (\$49.77), totaling \$987.11.
- **DECEMBER 2022 (TOTAL AMOUNT SPENT (\$3,413.65)):**
 - On December 3, 2022, NAVARRO made three (3) split transactions minutes apart from a BrandsMart in Miami, Florida using her P-Card with unuauthorized purchases totaling \$1,563.67.
 - In the first transaction, NAVARRO purchased a Frigidaire Stainless Steel Refrigerator (\$1,299.00) plus delivery and installation (\$39.99), totaling \$1,338.99. It should be noted that while the refrigerator appears on one single receipt, the transaction was split into two, for \$830.00 and \$508.99, in order to stay below the M-DCPS requirement for three bids on items above \$999.99. The delivery receipt shows a delivery address of 14219 SW 126 Path, Miami, Florida 33186, which is NAVARRO’S townhouse, a cell phone number of (786) 333-8206, which is NAVARRO’S cell phone number, and e-mail address of LubbyNavarro@mhs.net. “MHS” the domain name for Memorial Healthcare System, where NAVARRO was and is still currently employed.
 - In the second transaction, NAVARRO purchased a Ring Spotlight Outdoor Camera (\$189.99) and Refrigerator Water Line (\$19.99), totaling \$224.68.
 - On December 9, 2022, NAVARRO purchased a Global Furniture Capri Gray Power Reclining Sofa (\$1,749.99) and delivery of the sofa (\$99.99), totaling \$1,849.98. It should be noted that while the sofa appears on one single receipt, the transaction was split into two, for \$985.00 and \$864.98, in order to stay below the M-DCPS

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 Co-Affiant’s Initials 

requirement for three bids on items above \$999.99. The delivery receipt shows a delivery address of 14219 SW 126 Path, Miami, Florida 33186, NAVARRO'S townhouse, a cell phone number of (786) 333-8206, which is NAVARRO'S cell phone number, and e-mail address of Lubby9@bellsouth.net.




HOME DEPOT PURCHASES

On February 24, 2023, your Affiant received a subpoenaed response from Home Depot. Discussed below are unauthorized purchases made by NAVARRO at five (5) different Home Depot locations in Miami-Dade County and Broward County totaling **\$5,373.67**. None of the transactions are in connection with School Board-approved or school-related activities that benefit District 7 and/or serve a valid and proper public purpose. None of the items purchased by NAVARRO were returned to M-DCPS upon her resignation. In fact, NAVARRO purchased several commercial grade items like chrome wire shelving units, plastic shelving units, household items such as light bulbs, light fixtures, degreasers, patio umbrella, 5-gallon Homer buckets, steel folding chairs, as well as construction items like screws, plates, outdoor gardening items like plants, artificial turf, gardening soil, mulch, and rocks. Many of the aforementioned items were located at NAVARRO'S townhouse or at Shook Market. Your Affiant has broken down the Home Depot transactions by month in order to summarize the unauthorized spending.

- **FEBRUARY 2022 (TOTAL AMOUNT SPENT \$726.70):**
 - On February 19, 2022, NAVARRO made unauthorized purchases at a Home Depot in Miami, Florida, using her P-Card of a plastic shelving storage unit (\$179.96) and two (2) chrome wire shelving units (\$174.98 each), totaling \$567.01.
 - On February 26, 2022, NAVARRO made unauthorized purchases at a Home Depot in Miami, Florida, using her P-Card including but not limited to various construction items and a green patio umbrella (\$129.00), totaling \$159.69.
- **APRIL 2022 (TOTAL AMOUNT SPENT \$185.77):** On April 16, 2022, NAVARRO made unauthorized purchases at a Home Depot in Miami, Florida, using her P-Card including but not limited to various construction items (painter's tape, duct tape, etc.), eight (8) folding steel chairs, and two (2) 5-gallon Homer buckets, totaling \$185.77.

- **MAY 2022 (TOTAL AMOUNT SPENT \$229.00):** On May 16, 2022, NAVARRO made unauthorized purchases at a Home Depot in Miami, Florida, using her P-Card including garden soil, an Easter orchid arrangement, and trash bags, totaling \$229.00.
- **JUNE 2022 (TOTAL AMOUNT SPENT \$1,252.84):**
 - On June 5, 2022, NAVARRO made unauthorized purchases at Home Depot in Miami, Florida, using her P-Card including but not limited to tote container storage boxes, gardening items, cleaning items, an LED Suspended Ring Pendant light (\$269.00), and a Disk LED Chrome light fixture (\$99.97), totaling \$725.70.
 - On June 11, 2022, NAVARRO made unauthorized purchases at Home Depot in Miami, Florida, using her P-Card for household items, totaling \$527.14.
- **JULY 2022 (TOTAL AMOUNT SPENT \$181.45):** On July 19, 2022, NAVARRO made unauthorized purchases at Home Depot in Miami, Florida, using her P-Card for items including premium white marble chips (rocks) (\$159.60) and duct tape, totaling \$181.45.
- **SEPTEMBER 2022 (TOTAL AMOUNT SPENT \$2,797.91):**
 - On September 16, 2022, NAVARRO made unauthorized purchases at a Home Depot in Hollywood, Florida, including two (2) portable LED work lights (\$181.96), 40 bags of white marble chips (garden rocks) (\$319.20), as well as three (3) bottles of Raid Ant & Roach killer, and outdoor adhesive, totaling \$575.70.
 - On September 17, 2022, NAVARRO made unauthorized purchases at a Home Depot in Oakland Park, Florida, including six (6) rolls of 12-inch multipurpose turf (\$136.72), Febreze fabric freshener and painting supplies, totaling \$169.74. Approximately an hour after this purchase, NAVARRO made three (3) split transactions, minutes apart, at a Home Depot in Fort Lauderdale, Florida, totaling \$1,447.24.
 - In the first transaction in Fort Lauderdale, NAVARRO made a purchase totaling \$736.43.⁷
 - In the second transaction in Fort Lauderdale, NAVARRO purchased twenty-eight (28) rolls of 12-inch multipurpose turf (\$615.44), totaling \$658.52 including tax. NAVARRO'S name, personal cell phone number and address of

⁷ While the overall receipt was received, an itemized receipt from Home Depot was not received in the return subpoena for this particular transaction.




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NAVARRO'S abandoned property are found on the Customer Order Report for this transaction.

- In the third transaction in Fort Lauderdale, NAVARRO purchased small building supplies including screws and washers, as well as a bottle of water, totaling \$52.29.
- On September 18, 2022, NAVARRO made unauthorized purchases at a Home Depot in Oakland Park, Florida, including a 6-foot artificial green grass rug, plain aluminum sheet in silver, silver fluted carpet trim, and a peace lily in white plastic pot, totaling \$157.80.
- On September 19, 2022, NAVARRO made unauthorized purchases at a Home Depot in Hollywood, Florida, including twenty-one bags of mulch, two (2) sets of white outdoor bistro tables, white marble chips (garden rocks), plastic landscape edging, electrical conduits and accessories, and LED work light, totaling \$447.43.

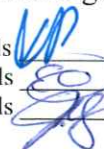
APPLE PURCHASES

Your Affiants received numerous Apple receipts with the assistance of Apple Investigator, Javier Suarez, and subpoenaed records from Apple.com. According to the documents, it is confirmed that NAVARRO made several unauthorized purchases directly from three (3) different Apple stores (walk-ins) between July 2021 and December 2022, utilizing her P-Card. The subpoenaed documents from Apple.com only indicate "installed product details related to serial numbers," meaning, only the products purchased directly from Apple.com and/or an Apple brick-and-mortar establishment with assigned serial numbers are included in the documents; they did not take into consideration nor provide records of any products that NAVARRO purchased from other retail stores that sell Apple products such as Walmart, Staples, and Office Depot. Also included were purchases made online which require a subscription and items downloaded from the iTunesMusicStore. The subpoenaed documents indicate the 'sign-on' information used to activate the purchased devices is lubby9@bellsouth.net, with associated name and address of Lubby Navarro and 11840 SW 177 Terrace, NAVARRO'S abandoned property. The documents also revealed the 'sign-on' information used to make iTunes purchases is gypsy0909@icloud.com, with associated name of Lubby Navarro.

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The Apple purchases through Apple.com for monthly subscriptions and/or download purchases made using NAVARRO'S P-Card from March 2022 to December 2022 total **\$188.14**. Your Affiants have broken down purchases made by NAVARRO solely from in-person Apple Stores by month in order to summarize the unauthorized spending which totaled **\$3,897.20**. M-DCPS was never reimbursed for any of these items, nor were any of the items returned to M-DCPS upon NAVARRO'S resignation. In fact, many of the items were found in NAVARRO'S townhouse upon the execution of the search warrant.

- **JULY 2021 (TOTAL AMOUNT SPENT \$1,449.95)**: On July 22, 2021, NAVARRO made unauthorized purchases from "Apple The Falls" in Miami, Florida, using her P-Card for AirPods with Charging Case (\$159.00), iPad Pro 11 (\$1,099.00), AppleCare+ warranty for iPad Pro 11-inch (\$129.00), Apple Pencil (\$129.00), iPad Air Smart Folio (\$79.00), Belkin 2-in-1 MagSafe Stand (\$99.95). NAVARRO was issued various education credit/discounts per the Apple receipt. The total amount applying these credits was \$1,449.95. NAVARRO split this transaction in two (between \$989.00 and \$460.95) in order to stay below the M-DCPS requirement for three bids on items above \$999.99. On July 25, 2023, the above-listed iPad Pro 11 was located and impounded from NAVARRO'S townhouse pursuant to the search warrant. The serial number on the Apple receipt matched the serial number on the iPad located at NAVARRO'S home.
- **OCTOBER 2021 (TOTAL AMOUNT SPENT \$40.66)**: On October 17, 2021, NAVARRO made unauthorized purchases from Apple Dadeland in Miami, Florida, using her P-Card for a USB Charge Cable, and USB Power Adapter, totaling \$40.66.
- **DECEMBER 2021 (TOTAL AMOUNT SPENT \$373.43)**: On December 13, 2021, NAVARRO made unauthorized purchases from Apple Dadeland in Miami, Florida, using her P-Card for a Magic Keyboard for iPad Pro, totaling \$373.43.
- **FEBRUARY 2022 (TOTAL AMOUNT SPENT \$148.68)**: On February 27, 2022, NAVARRO made unauthorized purchases from Apple The Falls in Miami, Florida, using her P-Card for a Belkin Magnetic Car Vent Mount and a MagSafe Battery Pack, totaling \$148.68.
- **APRIL 2022 (TOTAL AMOUNT SPENT \$635.48)**: On April 30, 2022, NAVARRO made unauthorized purchases from Apple Dadeland in Miami, Florida, using her P-Card for an Apple Watch Series 7 GPS with Starlight Sport Band (\$399.00), Belkin BoostCharge



Wireless Charger Stand (\$99.95), Belkin BoostCharge Pro Portable Fast Charger for Apple Watch, and AirTag Leather Key Ring, totaling \$635.48.

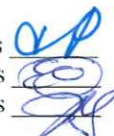
- **OCTOBER 2022 (TOTAL AMOUNT SPENT \$1,249.00)**: On October 7, 2022, NAVARRO made an unauthorized purchase from Apple Aventura Miami, Florida, using her P-Card for a Pink iMac, totaling \$1,299.00. NAVARRO was issued a \$50.00 education credit per the Apple receipt. The total amount applying this credit was \$1,249.00. NAVARRO split this transaction in two (between \$725.00 and \$524.00) in order to stay below the M-DCPS requirement for three bids on items above \$999.99.

GODADDY.COM PURCHASES

Your Affiants discovered four (4) charges on NAVARRO'S P-Card from GoDaddy.com in 2022, totaling **\$323.92**. On October 3, 2023, your Affiant received subpoenaed documents from GoDaddy.com. The documents reveal the purchases were for an annual subscription for the domain name LubbyNavarro.com. LubbyNavarro.com is NAVARRO'S political campaign website. The billing and shipping information listed "Lubby Navarro" and "Lubby Navarro Campaign" along with NAVARRO'S abandoned property address, e-mail address of lubby9@bellsouth.net, and verified cell phone number. The documents also confirm the credit card charged was a MasterCard ending in 3246, the same as NAVARRO'S P-Card. Per Miami-Dade County Public Schools, School Board Policies and Procedures, "[n]either the District, nor any person acting on behalf of the District, may expend general funds for political advertisement or electioneering communication."

OTHER STORE PURCHASES

Your Affiants have discussed in detail NAVARRO'S unauthorized spending from Walmart, Staples, Office Depot/Office Max, Home Depot, BrandsMart, Apple, and GoDaddy.com, however, it should be emphasized that NAVARRO also made unauthorized purchases from various stores not discussed in this warrant including but not limited to, Amazon, T-Mobile, FedEx, the Container Store, SpyTec GPS Inc., Sound Balance, EIG Constant Contact, UPS Store, USPS, Party City, iDesign Sign & Print, Phones Are Us, and Dollar Tree. The spending at these stores have also been included in the total amount for purposes of the grand theft and scheme to defraud. Your Affiants have not included each and every fact known to them concerning

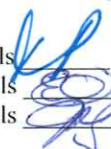


this investigation. Instead, your Affiants have stated only the facts they believe establish the necessary foundation and probable cause for the arrest of NAVARRO.

EXECUTION OF SEARCH WARRANTS

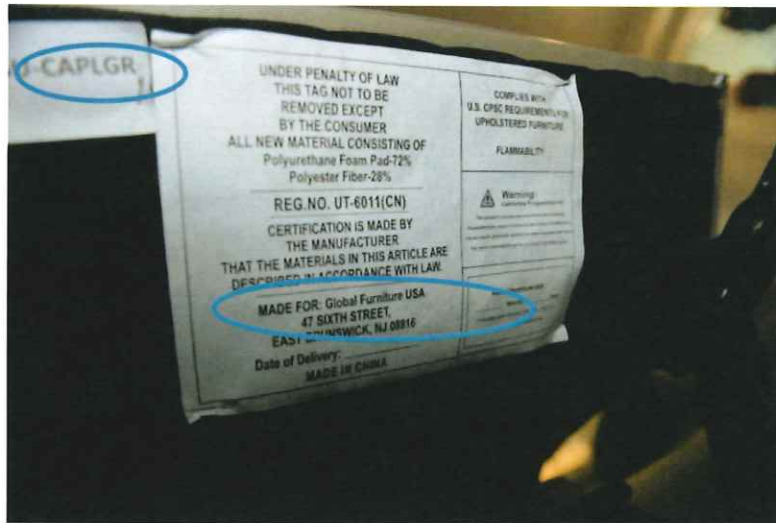
On July 25, 2023, your Affiant obtained signed search warrants for four (4) locations: 1) NAVARRO'S abandoned property, 2) NAVARRO'S townhouse, 3) Shook Market, and 4) Handy Storage Sixteen (units 3099 and 3100). On July 27, 2023, all search warrants were executed simultaneously by four teams. Each of the four teams were provided with "item identifiers," which in essence was a stack of pictures with accompanying descriptions of items confirmed to have been illegally purchased with NAVARRO'S P-Card. Since many of the items reflected on all the search warrants were perishables such as food, home goods, or other items that had already been used and/or contaminated, they were only documented and photographed. Only electronics such as phones, computers, receipts, gift cards, and documents were taken from the premises and documented on Miami Dade Property Receipt Forms. All other items found within the scope of the search warrants were photographed and left in place.




- 1) NAVARRO'S ABANDONED PROPERTY: This property is a single-family home that had clearly been abandoned and was uninhabitable in the state it was in on July 27, 2023. The property was contaminated with mold and rodent feces. There were pools of foul-smelling water and hazardous conditions such as a large hole in the ceiling and water damage. There was no electricity or running water. Due to the health risks, it was decided for officer safety, there would not be a full search of the premises. Instead, the property was photographed and videotaped. No items were removed from the property. Inside the property was furniture, bags, tote boxes, many of which were full of clothing, purses, cleaning agents and miscellaneous items.
- 2) NAVARRO'S TOWNHOUSE: This property is a townhouse where NAVARRO lives. NAVARRO was at the premises when your Affiants arrived. A full search was conducted, and several items purchased on NAVARRO'S P-Card were located inside and outside the townhouse. Your Affiant did not include in this affidavit every single piece of evidence found at the location due to its vast amounts. Your Affiant has included large ticket items and items which best depict the crime committed. All the items depicted below were also bought with NAVARRO'S P-Card as confirmed via subpoenaed documentation. Many of these items,



including but not limited to the Apple Watch, Keurig, Frigidaire Stainless Steel Refrigerator, Apple laptop, Apple iMacs, Apple AirTags, were positively identified by their serial numbers also contained within the corresponding store receipts discussed in this affidavit. Below are photos of the most notable items found to have been illegally purchased by NAVARRO using her P-Card:

- Global Furniture Capri Gray Power Reclining Sofa purchased on December 9, 2022 at BrandsMart (total cost plus delivery cost \$1,849.98). See receipt below where delivery address is listed as NAVARRO'S townhouse, along with NAVARRO'S cell phone and personal e-mail address.



Judge's Initials 
Affiant's Initials 
Co-Affiant's Initials 

DELIVERY



2503557

RECEIPT 0042503557 12/09/22
BrandsMart U.S.A. *****
14051 SOUTH DIXIE HIGHWAY
MIAMI FL 33157
(786) 242 6200

NAVARRO, LUSBY 0402246204
MIAMI DADE COUNTY SCHOOL BOAR
14219 SW 126TH PATH
MIAMI FL 33186
(786) 333 8206
LUSBY@BELLISOUTH.NET

Sold by: TALavera, SURISADAY - FURN 20:10
#12 GERALDINE TARNY 20:38

GLOBE GFRSU-CAPLGR 1 1749.99 1749.99
CAPRI LTHR FWR SOFA--LT GRAY
Warranty Parts 012 month/Labor 003 month
In Home Service 0 DAY RETURN
SERVC EXTEND WARRA. 1 0.00 0.00
CUSTOMER DECLINES WARRANTY
Warranty Parts 000 month/Labor 000 month
In Home Service 0 DAY RETURN
DELIV 1ST PC 1 99.99 99.99
DELIVERY
Warranty Parts 000 month/Labor 000 month
In Home Service 0 DAY RETURN
0 DIAS DE DEVOLUCION
SOLD BY SURISADAY

The cardholder agrees to the credit card amount shown hereon and agrees to perform the obligations set forth in the cardholder's agreement with the issuer.

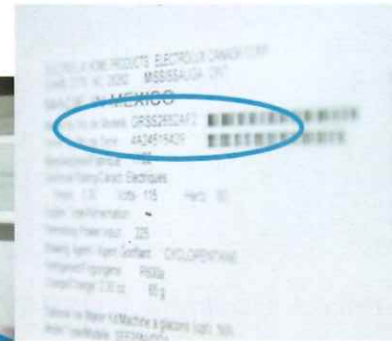
FOR SERVICE, DELIVERY, or SALES CALL:
(786) 242 6200

***** TOTAL PIECES 1 *****


Sales Amount: 1849.98
Sales Tax: 0.00
Total: 1849.98

090268 MC 3246

- Frigidaire Stainless Steel Refrigerator located in NAVARRO'S townhouse kitchen— purchased at BrandsMart on December 3, 2022 (total cost plus delivery and installation \$1,338.99). See receipt below where delivery address is listed as NAVARRO'S townhouse, along with NAVARRO'S cell phone and Memorial Health Services e-mail address.



DELIVERY


 2498056

RECEIPT 0042498056 12/03/22
 BrandsMart U.S.A. -----
 16061 SOUTH DIXIE HIGHWAY
 MIAMI FL 33157
 (786) 242 6200

NAVARRO, LUSBY 0402246204
 14219 SW 126TH PATH
 MIAMI FL 33186
 (786) 333 8206
 LUSBY@NAVARRO@MHS.NET

Sold by: BARRIOS, ALVARO - APPLIANC 17:54
 rs4 ALICIA EXANAR 18:12




FRIGI GRSS2452RF-SS 1 1299.00 1299.00
 25.6CF/LED/SMUDGEPROOF/ESTAR
 Warranty Parts 012 month/Labor 000 month
 In Home Service 30 DAY RETURN
 SERVC EXTEND WARRA. 1 0.00 0.00
 CUSTOMER DECLINES WARRANTY
 Warranty Parts 000 month/Labor 000 month
 In Home Service 0 DAY RETURN
 DELIV -HOOKUP 1 39.99 39.99
 DELIVERY/HOOKUP
 Warranty Parts 000 month/Labor 000 month
 Carry in Service 30 DAY RETURN
 SIZE 69 5/8" X 35 3/4" X 33"
 SOLD BY BARRIOS

The cardholder agrees to the credit card amount shown hereon and agrees to perform the obligations set forth in the cardholder's agreement with the issuer.

FOR SERVICE, DELIVERY, or SALES CALL:
 (786) 242 6200

***** TOTAL PIECES 1 *****


Sales Amount: 1338.99
 Sales Tax: 0.00
 Total: 1338.99

Judge's Initials 
 Affiant's Initials 
 Co-Affiant's Initials 

- Nespresso Maker located in NAVARRO'S townhouse kitchen—purchased on May 15, 2022 from BrandsMart (\$199.88). See receipt below where NAVARRO'S name, cell phone number and personal e-mail address are listed on the receipt.



CARRY OUT


 '1121246'

RECEIPT 0261121246 05/15/22
 BrandsMart U.S.A. -----
 10 SOUTH COMPASS WAY
 DANIA BEACH FL 33004
 (954) 846 2000

NAVARRO, LUSBY 2110290111
 PRIVATE
 MIAMI FL 33165
 (786) 333 8206
 LUSBY99@BELLSOUTH.NET

Sold by: CARRY OUT, 13:16
 r=10 DENIQUA SHELLEY 13:18

SAMST UN40NS200AFXZ 1 219.99 219.99
 40 LED 1080P IP
 Warranty Parts 012 month/Labor 012 month
 Carry in Service 30 DAY RETURN
 S/N: 055NGCPT311793

NESPR EN1248 1 199.88 199.88
 *D NESPRESSO PIXIE ALUMI
 Warranty Parts 012 month/Labor 012 month
 Carry in Service 30 DAY RETURN

CCEDA 169022 1 21.99 21.99
 *SI MAX SPRAY MOP
 Warranty Parts 001 month/Labor 001 month
 Carry in Service 30 DAY RETURN




The cardholder agrees to the credit card amount shown hereon and agrees to perform the obligations set forth in the cardholder's agreement with the issuer.

FOR SERVICE, DELIVERY, or SALES CALL:
(554) 846 2000

***** TOTAL PIECES 3 *****

Sales Amount: 440.64
 Sales Tax: 30.84
 Total: 471.48

055392 MC 3246 471.48

Judge's Initials 
 Affiant's Initials 
 Co-Affiant's Initials 

- LED Suspended Ring Pendant light located in NAVARRO'S townhouse dining room— purchased on June 5, 2022, from Home Depot (totaling \$199.88). See receipt below where the last four digits of NAVARRO'S P-Card can be seen (3246).



**How does
get more done**

11905 SW 152ND STREET
(305-234-9951)

6976 00006 44039 06/05/22 12:46 PM
SALE CASHIER ANDREA

071798780108 HDXMICRO48 <A> 17.98
HDX 48PK MICROFIBER CLOTHS
018643872014 HDX 20PK <A>
HDX 20-PK PLASTIC HANGERS
804.98 39.84
073149666680 90 QT TOTE <A>
90 QT STORAGE BOX, GRAY
804.98 00.00
022011668314 PENDANT <A> 269.00
LED SUSPENDED RING PENDANT DNT
037000933301 FABRICFRESH <A>
FEBREZE FABRIC UNSTP FRSH TOUCH 270Z
208.97 11.94
037000933304 FEBSMSPGAIN <A>
FEBREZE SMSP 2CT GAIN ORIG
304.97 14.91
037000851868 CARVENTLINEN <A> 6.97
FEBREZE CAR 3CT LINENSKY
883351469821 DOORLOCK <A> 47.97
KS SIG LIDO ENTRY SATIN NICKEL
810003440709 COMET BLCH <A>
COMET APC W BLEACH LEMON 320Z
203.28 6.56
037000933267 FEBSMSPLINEN <A> 4.97
FEBREZE SMSP 2CT LINENSKY
846979031894 ESSENCE DISK <A> 99.97
ESSENCE DISK LED INTEGRATD CHROME FM
059647911514 HDX CL VIN <A>
HDX CLEANING VINEGAR 64OZ
202.38 4.76
075381075466 DOWNCLIPS <A> 8.98
BULK DOWNCLIPS 12PK
043801043111 DEGREASER <A> 3.78
FORMULA 88 APC DEGREASER SPY 32OZ
021709009897 GROUT CLNR <A> 9.28
ZEP GROUT&BRIGHTENER 32OZ
810003440174 CMT LEM 21OZ <A>
COMET APC POWDER LEMON 21OZ
201.00 2.00
NLP Savings \$0.56
050134990852 SN ENTRY <A> 19.97
DEFIANT NAPLES ENTRY LEVER SN
045242601332 SAFETY GLASS <A> 14.97
SAFETY GLASSES WITH CLEAR FOG-FREE L
023400155194 SOFT SCRUB <A> 4.47
SOFT SCRUB DISINFECT W/BLEACH 36OZ

SUBTOTAL 678.22
SALES TAX 47.48
TOTAL \$725.70
XXXXXXXXXXXX3246 MASTERCARD
US\$ 725.70

ADT# 0000 008160/1005429
Chip Read
A10 4000000041010 MASTERCARD

P.O.#/JOB NAME: 00

6976 06/05/22 12:46 PM

6976 06 44039 06/05/2022 8072

RETURN POLICY DEFINITIONS
POLICY ID DAYS POLICY EXPIRES ON
A 1 90 09/03/2022

DID WE NAIL IT?

Take a short survey for a chance to WIN
A \$5,000 HOME DEPOT GIFT CARD




Opine en español

www.homedepot.com/survey

User ID: H89 95343 88373
PASSWORD: 22305 88367

Entries must be completed within 14 days
of purchase. Entrants must be 18 or
older to enter. See complete rules on
website. No purchase necessary.



Judge's Initials 
Affiant's Initials 
Co-Affiant's Initials 

- Green Patio Umbrella located in NAVARRO'S townhouse backyard—purchased on February 26, 2022, from Home Depot (\$129.00). See receipt below where the last four digits of NAVARRO'S P-Card can be seen (3246).



**How does
get more done.**

11905 SW 152ND STREET
(305-234-9951)

6976 00061 72613 02/26/22 04:23 PM
SALE SELF CHECKOUT

693690564121 ES60A19BN4PK <A>	11.34
ECS (60W) A19 SMT BW 4PK DIM	
043801043111 DEGREASER <A>	3.78
FORMULA 88 APC DEGREASER 3PT 3002	
887995296294 UMBRELLA <A>	129.00
9' ALUMINUM MARKET UMBRELLA ALOE	
887480063714 SHEET SCREW <A>	1.28
SMS ZINC PHL PAN #8 X 5/8	
887480068610 WOOD SCREW <A>	1.28
WOOD SCRW ZINC PHL FLT #4 X 3/8	
887480059717 SHEET MET SC <A>	1.28
SMS ZINC PHL OVAL #8 X 1	
887480054019 SHT MET SCRW <A>	1.28
SMS ZINC PHL FLT #6 X 1/2	

SUBTOTAL 149.24
SALES TAX 10.45
TOTAL \$159.69

XXXXXXXXXXXX3246 MASTERCARD
USD\$ 159.69
AUTH CODE 01880470010045 TA
Chip Read
AID A0000000041010 MASTERCARD

P.O.#/JOB NAME: PO

6976 02/26/22 04:23 PM

6976 61 72613 02/26/2022 5394

RETURN POLICY DEFINITIONS
POLICY ID DAYS POLICY EXPIRES ON
A 1 90 05/27/2022

Judge's Initials
Affiant's Initials
Co-Affiant's Initials

- Luminarc Cachet Balloon Wine Glasses (set of four), four (4) boxes were located in NAVARRO'S townhouse garage—purchased at BrandsMart on September 14, 2022. See receipt below where NAVARRO'S name, cell phone number and personal e-mail address are listed on the receipt.



CARRY OUT	
RECEIPT 024212020 09/14/22	
BrandsMart U.S.A. *****	
10 SOUTH COMBLES WAY	
LAKDA BEACH FL 33024	
(854) 246 2000	
PURCHASED, LINDSEY 311292000	
PRIVATE	
MIAMI FL 33143	
(784) 553 4224	
LINDSEY@EELSOFTW.HK	
Sold by: CHERO 18:30	
CALL INSTANT SERVICES 18:40	
DISH 10294 1 24.99 24.99	WARRANTY PARTS 001 month/Labor 001 month
	CARRY IN SERVICE 30 DAY RETURN
DISH 10298 1 24.99 24.99	WARRANTY PARTS 001 month/Labor 001 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
GLASS 10716 1 10.99 10.99	WARRANTY PARTS 012 month/Labor 012 month
	CARRY IN SERVICE 30 DAY RETURN
The cardholder agrees to the credit card amount shown herein and agrees to	

perform the obligations set forth in the cardholder's agreement with the issuer.

FOR SERVICE, DELIVERY, or SALES CALL:

(854) 246 2000

***** TOTAL PIECES 16 *****

Sales Amount:	358.08
Sales Tax:	35.07
Total:	393.15

070256 MC 3246 353.15

Judge's Initials VP
Affiant's Initials LP
Co-Affiant's Initials JR

- Oster Digital French Turbo Convection Oven located in NAVARRO'S townhouse garage— purchased at BrandsMart on October 7, 2022 (\$159.88). See receipt below where NAVARRO'S name, cell phone number and personal e-mail address are listed on the receipt.



Judge's Initials *JS*
Affiant's Initials *EC*
Co-Affiant's Initials *JS*

CARRY OUT



1234627

RECEIPT 0261234627 10/07/22
BrandsMart U.S.A. -----
10 SCOUTS COMPASS WAY
DANIA BEACH FL 33004
(954) 846 2000

NAVARRO, LUSBY 2110250001
MIAMI DADE COUNTY SCHOOL BOAR
1450 NE 2ND AVE.
MIAMI FL 33132
(784) 333 8206
LUSBY@BELLSOUTH.NET

Sold by: CARRY OUT, 16:03
BILL NANCY SIMOPOULOS 16:05

OSTER 12811VFDG 1 159.88 159.88
FRENCH DR LG DIGILT CONV
Warranty Parts 012 month/Labor 012 month
Carry in Service 30 DAY RETURN

CUISR C10-00-YELI 1 4.88 4.88
FOOD SAVER, LIME
Warranty Parts 012 month/Labor 121 month
Carry in Service 30 DAY RETURN

OSTER 128613-03 1 9.88 9.88
DD*SI SS SAUTE LID & GUARD
Warranty Parts 001 month/Labor 001 month
Carry in Service 30 DAY RETURN

OSTER 128613-03 1 9.88 9.88
DD*SI SS SAUTE LID & GUARD
Warranty Parts 001 month/Labor 001 month
Carry in Service 30 DAY RETURN

The cardholder agrees to the credit card amount shown herein and agrees to perform the obligations set forth in the cardholder's agreement with the issuer.

FOR SERVICE, DELIVERY, or SALES CALL:
(954) 846 2000

***** TOTAL PIECES 4 *****

Sales Amount: 194.52
Sales Tax: 12.92
Total: 197.44

- Ring Spotlight Outdoor Camera located at NAVARRO'S townhouse second floor balcony—purchased at BrandsMart on December 3, 2022 (\$189.99). See receipt below where NAVARRO'S name, townhouse address, cell phone number and Memorial Health Services e-mail address are listed on the receipt.



CARRY OUT



2498089

RECEIPT 0042488089 12/08/22
BrandsMart U.S.A. *****
14061 SOUTH DIXIE HIGHWAY
MIAMI FL 33157
(786) 242 6200

NOVARRO, LUBBY 0402246204
34219 SW 126TH PATH
MIAMI FL 33186
(786) 333 8206
LUBBY@NOVARRO@GMAIL.COM

Sold by: ZARGOZA, DANIEL - COMPUTE 18:09
ms4 ALICIA EXAMAR 18:14

RING SSELSTWENC 1 189.99 189.99
SPOTLIGHT CAMERA BATTERY
Warranty Parts 012 month/Labor 012 month
Carry in Service 30 DAY RETURN
SERVIC EXTEND WARRA. 1 0.00 0.00
CUSTOMER DECLINES WARRANTY
Warranty Parts 000 month/Labor 000 month
Carry in Service 0 DAY RETURN

Sold by:

PRODY F2REFSS 1 19.99 19.99
7FT REF WATERLINE SS
Warranty Parts 060 month/Labor 060 month
Carry in Service 30 DAY RETURN

The cardholder agrees to the credit card amount shown hereon and agrees to perform the obligations set forth in the cardholder's agreement with the issuer.

FOR SERVICE, DELIVERY, or SALES CALL:
(786) 242 6200

***** TOTAL PIECES 2 *****

Sales Amount: 209.98
Sales Tax: 14.70
Total: 224.68

010033 MD 3246 224.68

- Apple Watch Series 7 located in NAVARRO’S townhouse in NAVARRO’S bedroom—purchased at Walmart on February 26, 2022 (\$399.00). See receipt below where the last four digits of NAVARRO’S P-Card can be seen (3246), as well as the corresponding serial number.



Walmart 
 Save money. Live better.

305-964-3765 Ngr:JUAN
 15601 SW 127TH AVE
 MIAMI FL 33177

ST# 06397 OP# 000290 124 07 171 07537
 PRODUCT SERIAL # SQM3PKJX377
 AWS7418TL 01922220092 399.00 X
 PRODUCT SERIAL # SHGQXSVWFGGV
 AIRTAG 1PACK 019019932017 29.00 X
 SONY BOONBOX 002724289640 59.00 X
 SUBTOTAL 497.00
 TAX 1 7.00 % 34.79
 TOTAL 531.79
 MCARD TEND 531.79

MABTERCARD-3246 3 APPR# 069855
 REF # 205800374121
 PAYMENT SERVICE - A
 AID A0000000041010
 AAC 72689500C0A65D68
 TERMINAL # SC011120




02/26/22 20:01:35
 CHANGE DUE 0.00
 # ITEMS SOLD 3
 TC# 2118 6862 2910 1855 1107 6

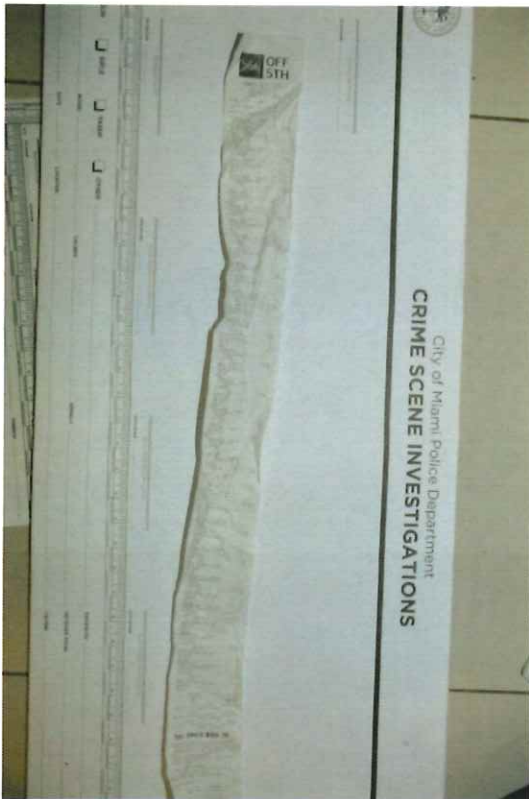


Starting Feb. 1st, gift cards won't discount Walmart or Murphy USA fuel.
 02/26/22 20:01:55
 CUSTOMER COPY
 ***** RETURN & EXCHANGE POLICY *****
 Electronics may be returned for refund or exchange with receipt WITHIN 10 days

During the search of NAVARRO’S townhouse, one (1) Visa gift card was found inside NAVARRO’S residence during the execution of the search warrant. BlackHawk Network records confirmed that this particular gift card was purchased with NAVARRO’S P-Card on May 9, 2022, from OfficeMax/Office Depot with a value of \$200.00.

Also recovered from NAVARRO’S residence during the execution of the search warrant were numerous receipts from various retail stores. Specifically, a receipt from Saks Off 5th dated July 6, 2022, was recovered. Upon examination, it was discovered that NAVARRO used three (3) gift cards to purchase items from Saks Off 5th such as: skincare and makeup, totes, clothing, sneakers, and numerous pairs of underwear for a total of **\$532.66**. The gift cards (ending in 8776, 8723, and 6176) used during this Saks Off 5th transaction were originally purchased from Office Max/Office Depot using her P-Card earlier that same day. Your Affiants confirmed this via subpoenaed documents from Blackhawk Network, bank statements, and the Saks Off 5th receipt.

Judge’s Initials 
 Affiant’s Initials 
 Co-Affiant’s Initials 



Additionally, during the search, the following documents were located within NAVARRO'S townhouse inside an accordion file: a blank M-DCPS Monthly Reconciliation Work Sheet, a JP Morgan Chase bank statement dated August 31, 2021 for NAVARRO'S Travel Card ending in #2761 (2 pages), an "unaltered" JP Morgan Chase bank statement dated August 31, 2021 for NAVARRO'S P-Card ending in #3246 (2 pages), and an "altered" JP Morgan Chase bank statement dated August 31, 2021 with White Out covering the words "Shook Market" (line 8), "P.O.S.: 614620210" (line 12), and "P.O.S.: 111-1007633-18114" (line 15). These actions exhibit NAVARRO'S conscious intent to defraud M-DCPS of taxpayer money in an organized scheme.

Judge's Initials *[Signature]*
 Affiant's Initials *[Signature]*
 Co-Affiant's Initials *[Signature]*



LIBERTY INSURANCE
MCCORMICK
1485 NE 2ND AVE ROOM 700
MIAMI FL 33132-1308




ACCOUNT NUMBER
XXXX-XXXX-XXXX-3246

STATEMENT DATE: 08/22/19

CARDHOLDER ACTIVITY

Purchasing Activity

Post Date	Tran Date	Reference Number	Transaction Description	Amount
08-12	08-11	05410191224105001584750	STAPLES 00118315 MIAMI FL P.O.S.: 000158488 SALES TAX: 2.78	42.58
08-12	08-11	05410191224105001584750	STAPLES 00118315 MIAMI FL P.O.S.: 000158471 SALES TAX: 3.34	648.70
08-17	08-16	55432861228200878056288	AMAZON.COM*207W49452 AMZN.COM/BILL WA P.O.S.: 111-3884825-87250 SALES TAX: 10.90	180.34
08-18	08-17	05410191230105001203801	STAPLES 00117218 MIAMI FL P.O.S.: 000130860 SALES TAX: 23.02	874.35
08-20	08-19	55432861231000751889027	AMZN MKTP US*207J10C2 AMZN.COM/BILL WA P.O.S.: 111-4884305-74708 SALES TAX: 1.47	22.42
08-20	08-19	55453701231042000016184	BRANDSMART USA DP DANIA BEACH FL	574.45
08-20	08-19	55453701231042000016180	BRANDSMART USA DP DANIA BEACH FL	148.20
08-20	08-19	75337001230300001290986	NESS PAPER CORP CP FLD 306526377 FL P.O.S.: SHOCK MARKET SALES TAX: 0.00	800.00
08-23	08-21	55432861233000164754683	AMZN MKTP US*207J10C2 AMZN.COM/BILL WA P.O.S.: 111-1007633-18114 SALES TAX: 22.08	337.04
08-23	08-22	55432861234100274180283	AMZN MKTP US*2000K482 AMZN.COM/BILL WA P.O.S.: 111-5071836-83650 SALES TAX: 2.80	42.75
08-23	08-20	75337001230230000118847	1 PERSON SIGNS & PRINT HOLLYWOOD FL	708.20
08-24	08-23	02305371236900242153188	OFFICEMAX/DEPOT 8146 HOLLYWOOD FL P.O.S.: 814602010 SALES TAX: 2.42	962.71
08-24	08-24	58429501236717450102883	SGI 8772127400 NY	24.95
08-25	08-24	05438841237000308812622	T-MOBILE STORE # 4785 CUTLER BAY FL	278.30
08-25	08-24	5543286123610060462579	AMZN MKTP US*254778M1 AMZN.COM/BILL WA P.O.S.: 111-1007633-18114 SALES TAX: 0.89	13.58
08-25	08-24	55432861237100163374379	PEACOCK EMBROIDERY 305-254-2405 FL	322.50
Total Purchasing Activity				8,013.50

Judge's Initials 
 Affiant's Initials 
 Co-Affiant's Initials 

STATEMENT NUMBER
XXXX-XXXX-XXXX-3246

STATEMENT DATE: 08/2021

CARDHOLDER ACTIVITY				
Trans. Date	Trans. Reference Number	Transaction Description	Amount	
08-15-2021	55432861228200876068288	STAPLES - 00120860 MIAMI FL P.O.S.: 00120860 SALES TAX: 23.02	548.70	
08-17-2021	55432861231200751889027	AMAZON.COM*2D7W49452 AMZN.COM/BILL WA P.O.S.: 111-3994605-97050 SALES TAX: 10.50	582.54	
08-18-2021	05410191230105001208601	STAPLES - 00117218 MIAMI FL P.O.S.: 000120860 SALES TAX: 23.02	874.20	
08-20-2021	55432861231200751889027	AMZN MKTP US*2D7ZU2600 AMZN.COM/BILL WA P.O.S.: 111-4694205-74706 SALES TAX: 1.47	22.42	
08-20-2021	55453701231042000016164	BRANDSMART USA DP DANIA BEACH FL	274.40	
08-20-2021	55453701231042000016180	BRANDSMART USA DP DANIA BEACH FL	748.20	
08-20-2021	75337001232300001290996	NESS PAPER CORP OF FLO 3056526377 FL SALES TAX: 0.00	800.00	
08-21-2021	55432861233200164754683	AMZN MKTP US*2D7UJ1GC2 AMZN.COM/BILL WA P.O.S.: 111-1007633-18114 SALES TAX: 22.05	37.04	
08-21-2021	55432861234100274180283	AMZN MKTP US*2D00K4X62 AMZN.COM/BILL WA P.O.S.: 111-5071836-83650 SALES TAX: 2.80	427.9	
08-21-2021	75337001232230000119542	I DESIGN SIGNS & PRINT HOLLYWOOD FL	76.20	
08-24-2021	0223053712326500242153169	OFFICEMAX/DEPOT 6146 HOLLYWOOD FL SALES TAX: 2.42	982.71	
08-24-2021	55453701231042000016180	BRANDSMART USA DP DANIA BEACH FL	24.80	
08-25-2021	55432861231200751889027	AMZN MKTP US*2D7ZU2600 AMZN.COM/BILL WA P.O.S.: 111-4694205-74706 SALES TAX: 1.47	278.20	
08-25-2021	55432861231200751889027	AMZN MKTP US*2D7ZU2600 AMZN.COM/BILL WA P.O.S.: 111-4694205-74706 SALES TAX: 1.47	13.58	
08-25-2021	55432861231200751889027	AMZN MKTP US*2D7ZU2600 AMZN.COM/BILL WA P.O.S.: 111-4694205-74706 SALES TAX: 1.47	382.00	
08-25-2021	55432861231200751889027	AMZN MKTP US*2D7ZU2600 AMZN.COM/BILL WA P.O.S.: 111-4694205-74706 SALES TAX: 1.47	820.80	

8-16 55432861228200876068288 AMAZON.COM*2D7W49452 AMZN.COM/BILL WA
P.O.S.: 111-3994605-97050 SALES TAX: 10.50

8-17 05410191230105001208601 STAPLES 00117218 MIAMI FL
P.O.S.: 000120860 SALES TAX: 23.02

8-19 55432861231200751889027 AMZN MKTP US*2D7ZU2600 AMZN.COM/BILL WA
P.O.S.: 111-4694205-74706 SALES TAX: 1.47

8-19 55453701231042000016164 BRANDSMART USA DP DANIA BEACH FL

8-19 55453701231042000016180 BRANDSMART USA DP DANIA BEACH FL


8-19 75337001232300001290996 NESS PAPER CORP OF FLO 3056526377 FL
SALES TAX: 0.00

8-21 55432861233200164754683 AMZN MKTP US*2D7UJ1GC2 AMZN.COM/BILL WA
P.O.S.: 111-1007633-18114 SALES TAX: 22.05

8-22 55432861234100274180283 AMZN MKTP US*2D00K4X62 AMZN.COM/BILL WA
P.O.S.: 111-5071836-83650 SALES TAX: 2.80

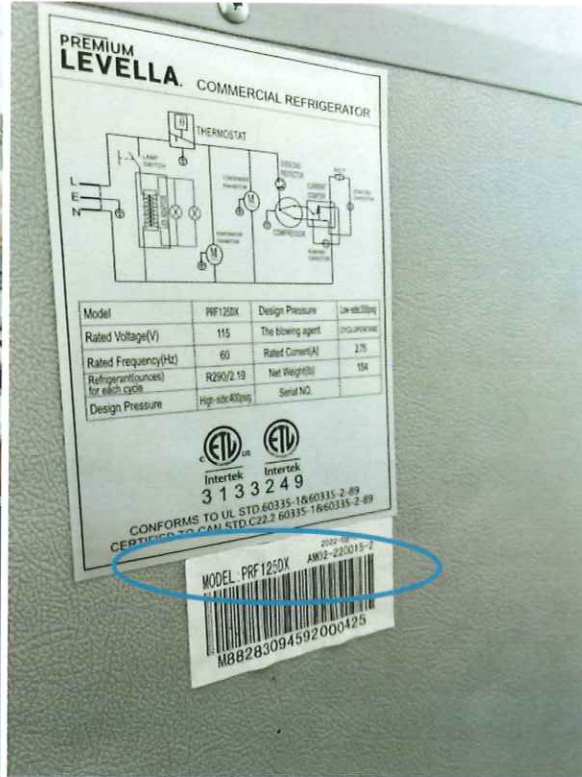
8-23 75337001232230000119542 I DESIGN SIGNS & PRINT HOLLYWOOD FL

8-24 0223053712326500242153169 OFFICEMAX/DEPOT 6146 HOLLYWOOD FL
SALES TAX: 2.42

Judge's Initials 
 Affiant's Initials
 Co-Affiant's Initials

3) SHOOK MARKET: Shook Market was searched pursuant to a search warrant on July 27, 2023. Several items purchased using NAVARRO'S P-Card were observed in the exterior and interior of Shook Market. Several items at Shook Market were confirmed via subpoenaed documentation to have been illegally purchased with NAVARRO'S P-Card. Additionally, M.D., the owner of Shook Market, corroborated which items were gifted to him for his business by NAVARRO, which will be discussed in further detail. Below are pictures taken at Shook Market with the corresponding receipts reflecting some of the items that were found during the execution of the search warrant. Your Affiants did not include in this affidavit every single piece of evidence found at the location due to its vast amounts, however, all documentation is readily available upon request. Your Affiants included below photos only of the large ticket items.

- **One (1) Premium Levella Commercial Refrigerator, model 125DX.** This item is reflected on a receipt from BrandsMart USA dated September 16, 2022. This purchase, totaling \$1,176.87, was split into two separate transactions of \$853.50 and \$323.37, avoiding the M-DCPS threshold requiring three (3) quotes for purchases above \$999.99. Additionally, the receipt also states, "M.D. to pick up unit."
- **Two (2) Avanti Wine Chillers, model WC34N2P.** Both wine chillers were purchased on September 16, 2022, in two separate transactions (receipt number 0261220532 and 0261220534). Each receipt reflects a total of \$310.17. Shook Market and its address are listed at the top of the receipt, along with the e-mail address of lubby9@bellsouth.net.
- **One (1) Breville Espresso Machine with Grinder, BES870XL.** This item is reflected on a receipt BrandsMart USA dated May 16, 2022, with a total purchase price of \$748.87. The name Lubby Navarro and phone number (786) 333-8206 are listed at the top of the receipt. Your Affiant learned that the above listed number belongs to NAVARRO.



DELIVERY

RECEIPT 026120224 09/16/22
 BrandsMart U.S.A. *****
 10 SOUTH COMPASS WAY
 DANIA BEACH FL 33004
 (954) 846 2000

091963 MC 3246 923.87

SHOOK MARKET
 2613 STERLING RD
 FORT LAUDERDALE FL 33312
 (754) 333 8206
 LUNSW@BELLFLOWER.NET

Sold by: WILBRUN, CLAUDE - APPLIANT 16:49
 17:09

PRIME REFRIG 1 1099.88 1099.88
 12.5 CUFT BEVERAGE COOLER
 Warranty Parts 012 month/Labor 012 month
 Carry in Service 30 DAY RETURN
 PICK UP BY CUSTOMER

DELIV INVPICKUP 1 0.00 0.00
 PICK UP BY CUSTOMER
 Warranty Parts 000 month/Labor 000 month
 Carry in Service 0 DAY RETURN

The cardholder agrees to the credit card amount shown herein and agrees to perform the obligations set forth in the cardholder's agreement with the issuer.

FOR SERVICE, DELIVERY, or SALES CALL:
 (954) 846 2000

***** TOTAL PIECES 1 *****

Sales Amount: 1099.88
 Sales Tax: 74.99
 Total: 1174.87

090468 MC 3246 882.50

NAVARRO/LIBBY

CREDIT
 APP: MASTERCARD
 RESP: Issuer
 AID: 1A0000000041010
 SMC: 23
 LAD: 01102040014200000072000000000000
 FSI: 8500
 TVR: 1000000000

091963 MC 3246 923.87

NAVARRO/LIBBY

CREDIT
 APP: MASTERCARD
 RESP: Issuer
 AID: 1A0000000041010
 SMC: 23
 LAD: 01102040014200000018600000000000
 FSI: 8500
 TVR: 1000000000

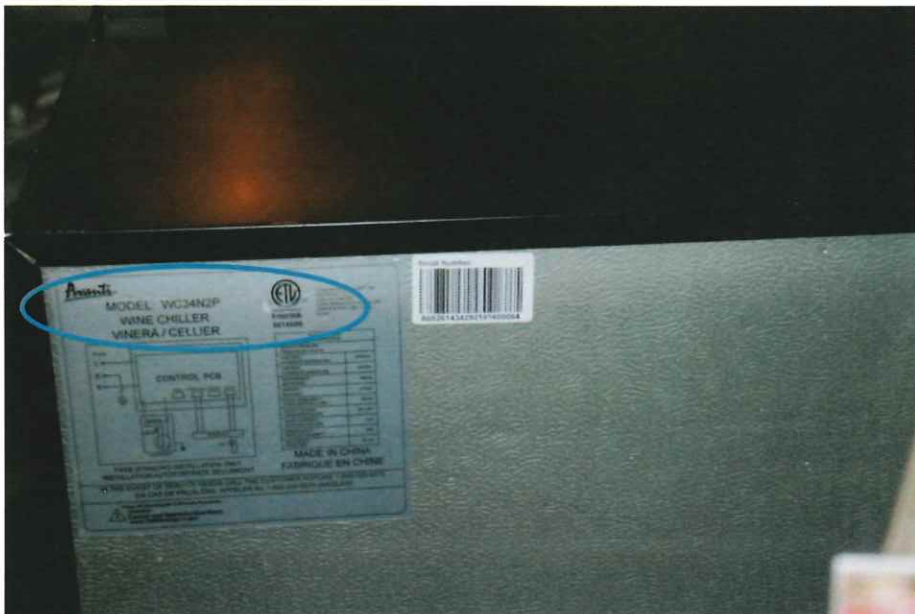
CHANGE 0.00

Manager: CRISTIAN CUERVO

DELIVERY INFORMATION
 Delivery Date: 09/20/22
 SHOOK MARKET
 2613 STERLING RD
 FORT LAUDERDALE FL 33312
 (754) 333 8206
 ** ALL CO'S MUST BE PAID IN CASH ONLY **

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Judge's Initials *[Signature]*
 Affiant's Initials *[Signature]*
 Co-Affiant's Initials *[Signature]*



Judge's Initials *KL*
Affiant's Initials *[Signature]*
Co-Affiant's Initials *[Signature]*

DELIVERY



'1220532'

RECEIPT 0261220532 09/16/22
BrandsMart U.S.A. *****
10 SOUTH COMPASS WAY
DANIA BEACH FL 33004
(954) 946 2000

SHOOK MARKET
2419 STIRLING RD
FORT LAUDERDALE FL 33312
(754) 333 8206
LUBBY@SHELLSOUTH.NET

Sold by: WILSON, CLAUDE - APPLIANT 16:51
BY: SHOOK MARKET 17:08

AVANT W04NDP 1 289.88 289.88
34 BOTTLE/ WIRE SHELF
Warranty Parts 012 month/Labor 012 month
Service in Service 30 DAY RETURN
DELIV IN SERVICE 0 0.00 0.00
PICK UP IVD BY CUSTOMER
Warranty Parts 000 month/Labor 000 month
Carry in Service 0 DAY RETURN

The cardholder agrees to the credit card amount shown herein and agrees to perform the obligations set forth in the cardholder's agreement with the issuer.

FOR SERVICE, DELIVERY, or SALES CALL:
(954) 946 2000

***** T O T A L P I E C E S 1 *****

Sales Amount: 289.88
Sales Tax: 20.29
Total: 310.17

074226 MD 3246 310.17

NAVARRO/LUBBY
CREDIT

APP :MASTERCARD
RESP:Issuer:
AID :A0000000041010
ARC :23
LAD :0110264001620000332E0000000000
TSI :R800
TVR :0000008000

CHANGE 0.00

Manager: CHRISTIAN GUERVO

DELIVERY INFORMATION
Deliver Date: 09/20/22
SHOOK MARKET
2419 STIRLING RD
FORT LAUDERDALE FL 33312
(754) 333 8206
-- ALL COD'S MUST BE PAID IN CASH ONLY --

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<http://www.brandsmartusa.com>

RETURN/REFUND POLICY:
OF COURSE! Brandsmart USA guarantees all prices for a 30 day period from the date of the purchase. If you find a lower verifiable price on a new sealed-carton product from a local stocking retailer within 30 days of purchase, we will refund 100% of the difference to you. OF COURSE! If you're not completely satisfied with your purchase, you can return merchandise within the specified number of return days. To receive full credit for all returned merchandise must be in the same condition as when purchased and complete with all accessories, remote, instructions, original box and packaging. Merchandise not meeting these requirements will not be accepted for return. Management at it's sole discretion may accept for return merchandise not meeting these requirements subject to 20% charge plus a charge for missing parts.

Legal:
Sold by Interbond Corporation of America
Title to the above merchandise is to remain with Brandsmart USA until payment in full is completely cleared. Should Brandsmart USA be required to retain an attorney to collect on this invoice, purchaser agrees to pay all attorney's fees and agree that the venue lies in Broward County, Florida.

Payments for your BrandsMart USA Credit Card now accepted in any store location.

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Affiant's Initials
Co-Affiant's Initials



CARRY OUT



1122168

RECEIPT 0241122168 05/16/22
BrandsMart U.S.A. *****
10 SOUTH COMPASS WAY
DANTA BEACH FL 33004
(854) 846 2000

NAVARRO, LUSBY 211035011
PRIVATE
MIAMI FL 33149
(786) 333 8206
LUSBY@BELLSOUTH.NET

Sold by: CARRY OUT, 16:04
rt6 MONIE REYES 14:05

BREVET RES70XKL 1 499.88 499.88
THE BARISTA EXPRESS
Warranty Parts 012 month/Labor 012 month
Carry in Service 24 DAY RETURN

The cardholder agrees to the credit card amount shown hereon and agrees to perform the obligations set forth in the cardholder's agreement with the issuer.

FOR SERVICE, DELIVERY, or SALES CALL:
(854) 846 2000

***** TOTAL PIECES 1 *****

Sales Amount: 499.88
Sales Tax: 48.99
Total: 748.87
075399 MC 3246 748.87

NAVARRO/LUSBY
CREDIT
APP: MASTERCARD
RESP: Issuer
AID: A0000000041010

ADC :23
LAD :011004001620000018000000000000
TSI :E800
TVL :00000000000
CHANGE 0.00

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RETURN/REFUND POLICY:
OF COURSE! BrandsMart USA guarantees all prices for a 30 day period from the date of the purchase. If you find a lower verifiable price on a new sealed-carton product from a local stocking retailer within 30 days of purchase, we will refund 100% of the difference to you. OF COURSE! If you're not completely satisfied with your purchase, you can return merchandise within the specified number of return days. To receive full credit for all returned merchandise must be in the same condition as when purchased and complete with all accessories, remote, instructions, original box and packaging. Merchandise not meeting these requirements will not be accepted for return. Management at it's sole discretion may accept for return merchandise not meeting these requirements subject to 20% charge plus a charge for missing parts.

Legal:
Sold by Interbond Corporation of America
Title to the above merchandise is to remain with BrandsMart USA until payment in full is completely cleared. Should BrandsMart USA be required to retain an attorney to collect on this invoice, purchaser agrees to pay all attorney's fees and agree that the venue lies in Broward County, Florida.

Payments for your BrandsMart USA Credit Card now accepted in any store location.




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www.brandsmartusa.com

4) HANDY STORAGE SIXTEEN (UNITS 3099 AND 3100): a search of these two storage units was conducted. Dozens of boxes containing school supplies such as hundreds of backpacks, pencils, rulers, and legal pads. It appears like these items were donated and do not appear to have been purchased using the P-Card. There were also numerous tote containers (consistent with those purchased by NAVARRO using her P-Card at various stores) containing receipts and paperwork. Gift card records and subpoenaed Handy Storage Sixteen records confirmed that that units 3099 and 3100 were rented by NAVARRO and paid for with at least eight (8) different gift cards purchased utilizing NAVARRO'S P-Card.

STATEMENT OF M.D.

On August 2, 2023, M.D., the owner of Shook Market, provided a sworn statement at the State Attorney's Office. M.D. stated he opened Shook Market in February 2021. Shook Market is located at 2613 Stirling Road, Ft. Lauderdale, Florida 33312. It sells juices, smoothies, sandwiches, and the like. M.D. stated he met NAVARRO when she came to his store in May or June of 2021. She purchased a juice, made small talk, and then returned the following day. NAVARRO and M.D. began "talking" as her visits to the market increased in frequency. NAVARRO eventually gave him her business card from Memorial Hospital and offered him whatever assistance he needed. She explained to him that she worked as a School Board Member and was responsible for many school events and gave out backpacks to needy children. She explained to M.D. that she would meet every other Wednesday with the other eight (8) School Board members to discuss important topics.

During the initial phase of the interview, M.D. denied having an amorous relationship with NAVARRO. In his opinion, they were merely friends but eventually began to see each other with more frequency. He later admitted that their relationship became intimate on a few occasions. According to M.D., NAVARRO noticed that although he was working hard, his business was not making the money it should have been making. M.D. stated that he never asked NAVARRO for money but did ask for her help and advice with the business since he was on the verge of closing the market. NAVARRO began to buy items for the market such as Ninja blenders, Breville Espresso machines, chest freezer, two wine coolers, fake grass, a Frigidaire refrigerator for drinks, and a \$900.00 Android cell phone for M.D.

Judge's Initials 
Affiant's Initials 
Co-Affiant's Initials 

M.D. provided your Affiant with photos taken from his cell phone of purchases made by NAVARRO from various stores. Your Affiant confirmed that most of the items in the photos provided by M.D. depicted items that were purchased by NAVARRO using her P-Card. Specifically, the following items were bought using NAVARRO'S P-Card from Walmart, Home Depot, and BrandsMart: Blackstone Electric Tabletop Griddle (1), Breville Espresso Machine (1), Artificial Grass Carpet (1), Luminarc Wine Glass Set of Four (4), Avanti Wine Chillers (2), Premium Levella Commercial Refrigerator (1), several plants, and Receptacle Cover Kit.



M.D. stated that sometimes NAVARRO would show up to Shook Market with items already in hand, and other times she would take M.D. to BrandsMart or Home Depot so he could pick out what he needed for Shook Market. On several occasions, M.D. would shop by himself, and NAVARRO would remotely pay for the items at check-out over the phone. M.D. also stated that on a few occasions, he observed NAVARRO make split transactions. According to M.D. he had understood from NAVARRO that she had a limit of \$1,000.00 on her credit card. She would pay for some items on one transaction and then would pay the remainder of the items in a separate transaction.

Your Affiant presented M.D. with a stack of "item identifiers" from Walmart, BrandsMart, and Home Depot of items confirmed via subpoenaed records to have been purchased using NAVARRO'S P-Card. Your Affiant has grouped the items by store:

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Affiant's Initials 
Co-Affiant's Initials 

WALMART

M.D. identified the following items were purchased for him by NAVARRO from Walmart:

1. Blackstone E-Series 22" Electric Tabletop Griddle with Prep Cart.
2. A Disney gift card. M.D. stated the gift card was loaded with \$400 or \$500.

BRANDSMART

M.D. identified the following items were purchased for him by NAVARRO from BrandsMart:

1. Samsung 40" Class LED FHD N5200 Series Smart TV. M.D. stated this item is presently located at Shook Market.
2. O-Cedar ProMist MAX Microfiber Spray Mop. M.D. stated this item is presently located at Shook Market.
3. Breville the Barista Express in Brushed Stainless Steel. M.D. stated this item is presently located at Shook Market. He did not witness this purchase but it was brought to him by NAVARRO. BrandsMart receipts and bank statements confirm that NAVARRO purchased two of these items from BrandsMart on May 16, 2022 and June 13, 2022.
4. Etec 6.0 ft. 8-Outlet Power Strip.
5. Ninja 72 oz 3-Speed Black Professional Plus Countertop Blender With Auto-iQ. M.D. stated NAVARRO purchased two of these blenders for him which are presently located at Shook Market.
6. Luminarc 20 oz Cachet Wine Glass Set of 4. M.D. stated NAVARRO purchased six or seven sets of these glasses which are presently located at Shook Market.
7. Interplak OptiClean Power Plaque Remover. M.D. stated NAVARRO purchased this item for him but he no longer has it.
8. Mikasa Set of 4 Champagne Flute Glasses. M.D. stated NAVARRO purchased five or six sets for him and they are presently located at Shook Market.
9. Fitbit Charge 5 Bluetooth Fitness Tracker With Built-in GPS And Heart Rate Monitor – Black.
10. Avanti 34 Bottle Wine Chiller. M.D. stated NAVARRO purchased two of these items for him and they are presently being used at Shook Market.
11. Premium Levella 12.5 CuFt Commercial Display Refrigerator 1-Glass Door Merchandise in Silver with 4 Adjustable Wire Shelves. M.D. stated this item was purchased for him by

NAVARRO and he picked it up at the BrandsMart warehouse. It is presently being used at Shook Market.

12. Cuisinart Wine Pourer with Stopper – Stainless Steel. M.D. stated NAVARRO purchased two or three of these items for him which are presently being used at Shook Market.
13. Premium Levella 10.0 Cubic Foot Manual Defrost Dual Function Chest Freezer. M.D. stated this item is presently being used at Shook Market.
14. IMUSA 4” Stainless Steel Strainer With Wood Handle. M.D. stated this item is presently being used at Shook Market.
15. Cuisinart Wine Winged Corkscrew – Stainless Steel. M.D. stated this item is presently being used at Shook Market.
16. Good Cook Mesh Sink Strainer. M.D. stated this item is presently being used at Shook Market.
17. Global Furniture Capri Gray Power Reclining Sofa. M.D. stated he observed this item inside NAVARRO’S townhouse.
18. Disney Large Mickey Mouse. M.D. stated he observed this item inside NAVARRO’S vehicle.
19. Disney Large Minnie Mouse. M.D. stated he observed this item inside NAVARRO’S vehicle.

HOME DEPOT

M.D. identified the following items were purchased for him by NAVARRO from a Home Depot located in Dania Beach, Florida:

1. Commercial Electric – Weatherproof Horizontal/Vertical Receptacle Cover Kit (3 purchased). M.D. stated this item is presently installed at Shook Market.
2. Vigoro 20 ft. Black Interlocking Plastic Landscape Edging.
3. Carlon ½ Schedule 40 and 80 PVC Type T Conduit Body. M.D. stated this item is presently installed at Shook Market.
4. Outdoor white table with 2 chairs. M.D. stated these items are presently located at Shook Market.
5. Earthgro 1.5 ft. Bagged Red Wood Mulch. M.D. stated these items are presently located at Shook Market.

6. Vigoro 10 in. Spathiphyllum Peace Lily in White Plastic Deco Pot. M.D. stated that he witnessed NAVARRO purchase and keep this item.
7. TrafficMaster Silver Fluted 72 in. x 1-3/8 in. Carpet Trim. M.D. stated this item is presently installed at Shook Market.
8. TrafficMaster 6 ft. x 8 ft. Green Artificial Grass Rugs. M.D. stated these items are presently installed at Shook Market.
9. Tapcon 3/16 in. x 1-3/4 in. White Star Flat-Head Concrete Anchors. M.D. stated these items are presently installed at Shook Market.
10. TrafficMaster Fescue Multipurpose 12 ft. Wide x Cut to Length Green Artificial Grass Carpet. M.D. stated this item is presently installed at Shook Market.
11. High-Density Foam Mini Paint Roller with Frame, 6 in. x 3/8 in. M.D. stated this item was used at Shook Market.
12. Roberts 1 Gal. Indoor/Outdoor Carpet and Artificial Turf Adhesive. M.D. stated this item was used at Shook Market.
13. Huskey lamp. M.D. stated this item is presently located at Shook Market.
14. Pavestone 0.50 cu. Ft. 0.75 in. to 1.75 in. Premium White Marble Chips. M.D. stated these chips are presently being used at Shook Market and at his Hollywood apartment.
15. Sterilite 90 Qt. Storage Box. M.D. stated this is being used at Shook Market.
16. Scotch Blue Sharp Lines Multi-Surface Painters Tape. M.D. stated this item was used at Shook Market.
17. Everbilt #4 x 3/8 in. Phillips Flat Head Zinc Plated Wood Screw. M.D. stated this item was used at Shook Market.
18. Beige Metal Stackable Folding Chairs. M.D. believes these chairs may be at his home.
19. HDX 6-Tier Commercial Grade Heavy Duty Steel Wire Shelving. M.D. stated these are presently being used at Shook Market.
20. HDX 5-Tier Garage Storage Shelving Unit in Grey (36 in. W x 72 in. H x 24 in. D). M.D. stated these are presently being used at Shook Market.

According to M.D., NAVARRO fell in love with him, but he explained to her that their relationship would never grow beyond friendship due to his religion. He believed that NAVARRO was attempting to “buy him” with gifts. She took him shopping for clothes at stores such as Zara



and Ross and offered to pay for a dentist to fix his teeth. In July of 2021, M.D. introduced NAVARRO to his parents. NAVARRO subsequently took them all out to dinner several times.

M.D. stated that NAVARRO would always pay with a credit card, but he never saw which one. On some occasions, NAVARRO would pay for purchases with gift cards. NAVARRO would always have gift cards readily available in her purse and would sometimes give him a few to use on himself. He recalls on two occasions receiving gift cards loaded with either \$200 or \$300.

UNAUTHORIZED TRAVEL CARD PURCHASES




M.D. described a period when his family came to visit him during July of 2022. During the first week of his family visit, NAVARRO took him to a supermarket and spent about \$800 to \$900 dollars on groceries for his family. NAVARRO then rented a car for M.D. from July 20, 2022, to August 20, 2022. According to M.D., the rental vehicle was from the Avis Rental on State Road 441, in Hollywood, Florida. Your Affiant subpoenaed documents from Avis/Budget Rentals and confirmed that NAVARRO rented a vehicle for a month, from July 19, 2022, to August 19, 2022, corroborating M.D.'s sworn statement. The credit card used for the rental was NAVARRO'S Travel Card ending in #2761 and this card was charged **\$1,034.08**. NAVARRO'S Travel Card bank statement for August also indicates the same amount. See below snippet from NAVARRO'S August 2022 Travel Card statement.

08-22	08-19	52708062232825317226005	AVIS RENT-A-CAR HOLLYWOOD FL 317226000	HOLLYWOOD	1,034.08
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Orlando, Florida Vacation

According to M.D., the day before his family's arrival in Miami, NAVARRO flew to Orlando to personally buy entry tickets to Disney's Magic Kingdom and Universal Studios' Volcano Bay theme park and to rent two hotel rooms for his entire family.

M.D. provided your Affiant with photos and videos from his cell phone sent to him by NAVARRO showing the following: two sets of eight (8) purchased tickets for each of M.D.'s family members from Disney and Universal Studios, a video of two adjacent hotel rooms which she had rented for his family in Orlando, and a picture of NAVARRO'S boarding pass from Orlando to Miami on August 13, 2022. See below photos of the theme park tickets, boarding pass and a still frame of the video of the hotel rooms sent to M.D. by NAVARRO.

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Affiant's Initials 
Co-Affiant's Initials 






M.D.'s statements were corroborated by independent records from NAVARRO'S Travel Card and subpoenaed records from American Airlines. American Airlines records confirm that on August 12, 2022 NAVARRO purchased a one-way ticket from Miami (MIA) to Orlando (MCO) (ticket # 0012449433774), and a one-way ticket from Orlando to Miami (ticket # 0012449433435), using NAVARRO'S Travel Card. The passenger listed on both tickets was Lubby Navarro. NAVARRO'S Travel Card bank statement also reflects two American Airlines transactions on August 12, 2022, for each flight: a charge of \$23.02 for the outbound flight to Orlando, and a charge of \$111.60 for the return flight to Miami, totaling **\$134.62**. Said bank statement identifies each charge with a respective ticket number matching the American Airlines flight record ticket numbers. See below snippets of American Airlines records and NAVARRO'S Travel Card statement, as described above.

American Airlines														
Record Locator: IFDMMK		Record Create Date: 2022-08-12				Sabre Status: Purged								
Passenger Information		Pax nbr	Name		Grp Qty		Group							
		1 01	NAVARRO/LUBBY											
Flight Information														
Seg Nbr	Flight	Class	Date	Dep	Arv	Stat	Qty	Dep Time	Arv Time	Operat Flight	Operat Class	Operat Rec Loc	Market Fligh	Market Class
1	AA1712	R	2022-08-13	MIA	MCO	HK	1	08:43	10:02					

American Airlines														
Record Locator: GWOPXR		Record Create Date: 2022-08-12				Sabre Status: Purged								
Passenger Information		Pax nbr	Name		Grp Qty		Group							
		1 01	NAVARRO/LUBBY											
Flight Information														
Seg Nbr	Flight	Class	Date	Dep	Arv	Stat	Qty	Dep Time	Arv Time	Operat Flight	Operat Class	Operat Rec Loc	Market Fligh	Market Class
1	AA1700	R	2022-08-13	MCO	MIA	HK	1	20:32	21:46					

08-15	08-12	52704872225978000029460	AMERICAN	00124494334350	8004337300	TX								111.60
NAVARRO/LUBBY DEPARTURE: 08-13-22 P.O.S.: SALES TAX: \$0.00 MCO AA B MIA														
08-15	08-12	52704872225978000029551	AMERICAN	00124494337742	8004337300	TX								23.02
NAVARRO/LUBBY DEPARTURE: 08-13-22 P.O.S.: SALES TAX: \$0.00 MIA AA G MCO														

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 Affiant's Initials 
 Co-Affiant's Initials 

When NAVARRO turned in her reconciliation paperwork for the Travel Card for August 2022, the statement that was turned in was clearly doctored in a scheme to defraud by removing her name and departure dates for the unauthorized air travel. See below snippet (and compare to original above) from the August 2022 bank statement turned in by NAVARRO.

08-15	08-12	52704872225978000029460	AMERICAN 00124494334350 8004337300 TX P.O.S.: SALES TAX: \$0.00 MCO AA B MIA	111.80
08-15	08-12	52704872225978000029551	AMERICAN 00124494337742 8004337300 TX P.O.S.: SALES TAX: \$0.00 MIA AA G MCO	23.02

Additionally, M.D.'s statements regarding the two hotel rooms in Orlando rented for him by NAVARRO were also corroborated by NAVARRO'S Travel Card bank statement. On August 16, 2022, there were two payments of \$691.75 and \$324.12 made to the DoubleTree Hotel in Orlando for a total of **\$1,015.87**. See below snippets of NAVARRO'S Travel Card bank statement reflecting the above described Doubletree Hotel Orlando transactions.




08-18	08-16	52704872229036022229398	DOUBLETREE ORLANDO ORLANDO FL 2222939 ARRIVAL: 08-13-22	691.75
08-18	08-16	52704872229036022229406	DOUBLETREE ORLANDO ORLANDO FL 2222940 ARRIVAL: 08-13-22	324.12

When NAVARRO turned in her reconciliation paperwork for the Travel Card for August 2022, the Doubletree entries were clearly doctored in a scheme to defraud by removing arrival dates for the unauthorized hotel stays. See below snippet (and compare to the original above) from the August 2022 bank statement turned in by NAVARRO.

08-18	08-16	52704872229036022229398	DOUBLETREE ORLANDO ORLANDO FL 2222939	691.75
08-18	08-16	52704872229036022229406	DOUBLETREE ORLANDO ORLANDO FL 2222940	324.12

Las Vegas, Nevada Vacation




According to M.D., once his family left Miami, NAVARRO approached him and told him that since she had done so much for his family, he had to accompany her on a vacation to Las Vegas, Nevada. M.D. stated that the Las Vegas trip lasted three (3) days. The Las Vegas vacation

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described by M.D. was corroborated by NAVARRO'S Travel Card bank statement, records obtained from American Airlines, and records obtained from The Wynn Hotel located in Las Vegas, Nevada.

NAVARRO'S Travel Card bank statement revealed that on August 2, 2022, NAVARRO purchased two round-trip American Airlines tickets to Las Vegas. One ticket was listed under the name Lubby Navarro, and the second ticket was listed under the name M.D. There was a payment of \$372.20 for each ticket with a departure date of August 25, 2022 and a return date of August 28, 2022. Furthermore, NAVARRO'S Travel Card bank statement and American Airlines records reveal that on August 15, 2022, NAVARRO purchased platinum pro upgrades for herself and M.D. for an additional \$241.88 per ticket. NAVARRO spent a total of **\$1,228.16** in unauthorized air travel for her and M.D.'s travel to and from Las Vegas, Nevada. See below snippets of NAVARRO'S Travel Card bank statement and American Airlines records reflecting the above described Las Vegas vacation.

American Airlines																
Record Locator: HDZTDW			Record Create Date: 2022-08-01			Sabre Status: Purged										
Passenger Information		Pass-Id	Name	Grp	Qty	Group										
		1.01	NAVARRO LUBBY													
		2.01	[REDACTED]													
Flight Information		Seq Nbr	Flight	Class	Date	Dep	Arv	Stat	Qty	Dep Time	Arv Time	Operat Flight	Operat Class	Operat Rec Loc	Market Flight	Market Class
		1	AA2319	J	2022-08-25	MIA	LAS	HK	2	21:23	23:44					
		2	AA2534	S	2022-08-28	LAS	MIA	HK	2	23:27	07:15					
Ticket Information		Seq Nbr	Ticket or TLT Text													
		1	T-15AUG-HDQ5MOB													
		2	TE 0012446892967 NAVARRO L XTM7172 1535/02AUG													
		3	TE 0012446892968 D [REDACTED] M XTM7172 1535/02AUG													
		4	TE 0012450159685 NAVARRO L HDQ5MOB 1633/15AUG													
		5	TE 0012450160427 L [REDACTED] M HDQ5MOB 1633/15AUG													
		6	TE 0014401155028 NAVARRO L HDQ5MOB 1633/15AUG - UP													
		7	TE 0014401155027 L [REDACTED] M HDQ5MOB 1633/15AUG - UP													
Phone Information		Seq Nbr	City	Phone Number	Type											
		1	WWW	LUBBY@SABELLSOUTH.NET-E	O											
		2	WWW	1786-333-8206-C	O											
Address Information		Address														
		LUBBY NAVARRO 1450 NE SCOND AVE MIAMI, FL 33132														

Judge's Initials 
 Affiant's Initials 
 Co-Affiant's Initials 

Travel Activity

Post Date	Tran Date	Reference Number	Transaction Description	Amount
08-04	08-02	52704872215978000103754	AMERICAN 00124468929872 8004337300 TX NAVARRO/LUBBY DEPARTURE: 08-25-22 P.O.S.: SALES TAX: \$0.00 MIA AA Q LAS AA S MIA	372.20
08-04	08-02	52704872215978000103762	AMERICAN 00124468929880 8004337300 TX D /M DEPARTURE: 08-25-22 P.O.S.: SALES TAX: \$0.00 MIA AA Q LAS AA S MIA	372.20




Travel Activity

Post Date	Tran Date	Reference Number	Transaction Description	Amount
08-17	08-15	52704872228978000631957	AMERICAN 00144011550262 8004337300 TX NAVARRO/LUBBY DEPARTURE: 08-25-22 P.O.S.: SALES TAX: \$0.00 MIA AA J LAS	241.88
08-17	08-15	52704872228978000631965	AMERICAN 00144011550270 8004337300 TX D /M DEPARTURE: 08-25-22 P.O.S.: SALES TAX: \$0.00 MIA AA J LAS	241.88

When NAVARRO turned in her reconciliation paperwork for the Travel Card for August 2022, the statement was clearly doctored in a scheme to defraud by removing the passenger names and departure dates for this unauthorized travel. See below snippet (and compare to the originals above) from the August 2022 bank statement turned in by NAVARRO.

Travel Activity

Post Date	Tran Date	Reference Number	Transaction Description	Amount
08-04	08-02	52704872215978000103754	AMERICAN 00124468929872 8004337300 TX P.O.S.: SALES TAX: \$0.00 MIA AA Q LAS AA S MIA	372.20
08-04	08-02	52704872215978000103762	AMERICAN 00124468929880 8004337300 TX P.O.S.: SALES TAX: \$0.00 MIA AA Q LAS AA S MIA	372.20

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Co-Affiant's Initials 

Travel Activity

Post Date	Tran Date	Reference Number	Transaction Description	Amount
08-17	08-15	52704872228978000631957	AMERICAN 00144011550262 8004337300 TX P.O.S.; SALES TAX: \$0.00 MIA AA J LAS	241.88
08-17	08-15	52704872228978000631965	AMERICAN 00144011550270 8004337300 TX P.O.S.; SALES TAX: \$0.00 MIA AA J LAS	241.88

NAVARRO'S Travel Card bank statement also reflects a partial payment of \$180.27 made to the Wynn Las Vegas Hotel on August 2, 2022. On August 29, 2022, another payment to the Wynn Las Vegas Hotel was made for \$4,202.35. Total charges made to the Wynn Las Vegas Hotel using the NAVARRO'S M-DCPS issued Travel Card was **\$4,338.19**⁸. See below snippets from NAVARRO'S Travel Card bank statement listing the Wynn Las Vegas Hotel charges.

08-04	08-02	55432862216200936503227	WYNN LAS VEGAS HOTEL LAS VEGAS NV 259106 ARRIVAL: 08-25-22	180.27
08-30	08-29	55432862242200121142755	WYNN LAS VEGAS HOTEL LAS VEGAS NV 910672 ARRIVAL: 08-25-22	4,202.35

When NAVARRO turned in her reconciliation paperwork for the Travel Card for August 2022, the statement was clearly doctored in a scheme to defraud by removing the arrival date for this unauthorized hotel stay at the Wynn Hotel. See below snippet (and compare to the original above) from the August 2022 bank statement turned in by NAVARRO.

08-04	08-02	55432862216200936503227	WYNN LAS VEGAS HOTEL LAS VEGAS NV 259106	180.27
08-30	08-29	55432862242200121142755	WYNN LAS VEGAS HOTEL LAS VEGAS NV 910672	4,202.35

On October 10, 2023, your Affiant received subpoenaed documents from the Wynn Las Vegas Hotel. According to the documents, NAVARRO rented room #61102 from August 25, 2022, to August 29, 2022, using her Travel Card for a total of **\$4,338.19**, which is consistent with the Travel Card bank statements. M.D. and NAVARRO were the listed guests for room #61102. The Wynn Hotel receipt described the charges made by NAVARRO during her stay, including but

⁸ A credit of \$44.43 was issued back to the P-Card on the August 2022 bank statement not pictured here.

[Handwritten signatures in blue ink]

not limited to: \$501.65 in charges to the Encore Beach Club, \$174.85 in charges to the Jardin Brunch & Breakfast, \$416.13 in charges to Sinatra Italian Restaurant, \$298.51 in charges at Allegro Italian Restaurant, \$176.89 in charges at the Eastside Lounge, \$229.65 in charges for Encore In-Room Dining, \$173.20 at XS Nightclub, among several other charges for food/drinks and hotel resort fees/taxes/upgrades.


Investigation also revealed NAVARRO charged her Travel Card for Uber and cab rides during her Las Vegas stay totaling **\$156.29**. Your Affiants confirmed there were no conferences or M-DCPS related business occurring in Las Vegas during this time. Additionally, NAVARRO failed to request prior district school board approval and place it on an agenda for public comments regarding the travel as required by Florida Statute §1001.39.

M.D. stated that in August or September of 2022 he ended their relationship because NAVARRO became extremely possessive and began to follow him and harass him via phone calls, and Instagram messages. NAVARRO sent Instagram messages to M.D.'s mother and family members telling them that she was his girlfriend and was pregnant with M.D.'s child. According to M.D., the messages were harassing and menacing. NAVARRO sent a picture of herself on social media to M.D.'s mother showing off a pregnant belly. Some time later, NAVARRO appeared at the parking lot of Shook Market and waved at him from outside. M.D. ran outside as she was driving away to confirm if she was indeed pregnant. When he reached her car window, he observed she had no pregnant belly. NAVARRO told him that she had taken pills and the baby had died. Subpoenaed documents from Amazon.com revealed that on November 2, 2022, NAVARRO purchased two (2) artificial silicone pregnancy bellies with cotton filling, one reflecting a 2-4 month pregnancy and the other reflecting 3-10 month pregnancy, using her P-Card.

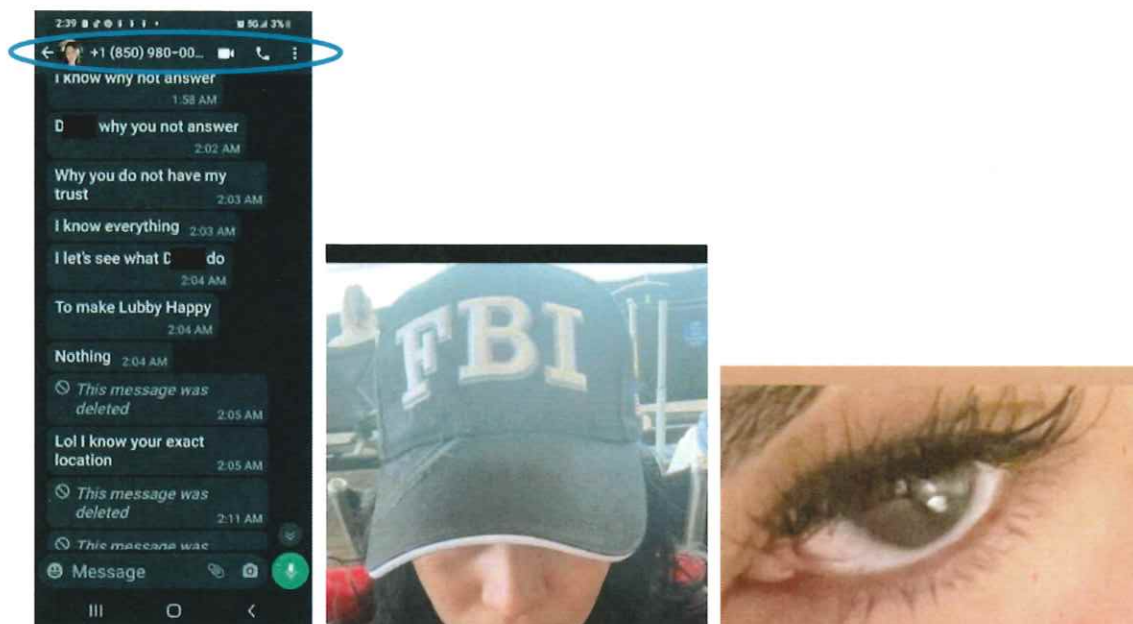
M.D. further described NAVARRO'S harassing behavior. He stated NAVARRO began following him everywhere after the breakup; she would pop up anywhere and everywhere, and knew where he was at all times. He stated NAVARRO would park her car in front of his market and remain there for hours. M.D. also stated that NAVARRO told him she worked for the FBI and knew everything about him.⁹ M.D. stated that NAVARRO sent him a picture of herself wearing an FBI baseball cap and a picture of her eyeball indicating that she was constantly watching him.

⁹ NAVARRO'S biography touts that she graduated from the U.S. Department of Justice, Federal Bureau of Investigation (FBI) Miami Division Citizens Academy, 32nd Class on December 17, 2021.

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M.D. also provided Your Affiant with a screenshot of messages sent to him by one of many of NAVARRO'S phone numbers.¹⁰ See below for the above described photos.



M.D. stated that at one point he began hearing a beeping sound from his iPhone each time he entered his car. He became so concerned that he began to search his car for tracking devices. M.D. found two (2) Apple AirTags attached to his car with duct tape. One on the underside of the passenger wheel well and another on the front grill of his car. He removed the AirTags and took pictures of them. See below photos. M.D. stated he had kept them until recently when he threw them away. M.D. never reported NAVARRO to the police. Subpoenaed documents from Walmart revealed NAVARRO made two purchases of Apple AirTags using her P-Card. One pack of four AirTags were purchased on April 29, 2022 and the other pack of four was purchased on November 25, 2022, both from Walmart. The pack purchased on April 29, 2022 was found at NAVARRO'S townhouse pursuant to the execution of the search warrant (two of the four AirTags were found inside the pack matching the serial and UPC numbers found on the Walmart receipt dated April 29, 2022).

¹⁰ It should be noted that your Affiants confirmed through subpoenaed T-Mobile records that the phone number in the screenshot provided by M.D., (850) 980-0067, is a phone number assigned to NAVARRO.

Judge's Initials
Affiant's Initials
Co-Affiant's Initials

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Punta Cana, Dominican Republic Vacation

Upon further examination of NAVARRO'S Travel Card bank statement, other irregularities became evident. Specifically, your Affiants discovered an unauthorized vacation to Punta Cana, Dominican Republic, for NAVARRO and her mother, Zoila Luperon.

NAVARRO'S Travel Card bank statement revealed that on August 2, 2022, there were two charges from American Airlines for \$577.17 each. Your Affiant subpoenaed records from American Airlines confirming that NAVARRO used her Travel Card to purchase two (2) round-trip tickets for herself¹¹ and her mother, Zoila Luperon, from Miami (MIA) to Punta Cana (PUJ), Dominican Republic, from August 7, 2022, to August 11, 2022. The total cost for the trip charged on NAVARRO'S Travel Card was **\$1,154.34**. See below snippets of NAVARRO'S American Airlines flight information and Travel Card bank statement as described above.

¹¹ It should be noted that records from American Airlines lists "Lubby Gonzalez" as the passenger for this international roundtrip, and that NAVARRO'S maiden name is Gonzalez, as reflected on her U.S. Passport.

[Handwritten initials]

American Airlines																		
Record Locator: GMPVCK				Sabre Status: Purged				Report Date & Time: Aug										
Passenger Information		Pax nbr	Name	Grp	Qty	Group												
		1.01	LUPERON/ZOILA															
		2.01	GONZALEZ/LUBBY															
Flight Information		Seq Nbr	Flight	Class	Date	Dep	Arv	Stat	Qty	Dep Time	Arv Time	Operat Flight	Operat Class	Operat Rec Loc	Market Flight	Market Class		
		1	AA773	R	Aug 7, 2022	MIA	PUJ	YG	2	09:01	11:33							
		2	AA347	R	Aug 11, 2022	PUJ	MIA	HK	2	17:37	20:14							
Ticket Information		Seq Nbr	Ticket or TLT Text															
		1	T-02AUG-XTM7CCK															
		2	TE 0012446914789 LUPER/Z XTM7CCK 1708/02AUG 1B*CDFBDD															
		3	TE 0012446914790 GONZAL XTM7CCK 1708/02AUG 1B*CDFBDD															
Phone Information		Seq Nbr	City	Phone Number	Type													
		1	WWW	LUBBY9@BELLSOUTH	NET-EOPT	O												
		2	HDQ	C	DOM	O												
		3	HDQ	1-786-333-8206	POPT	O												
		4	QSW	786-333-8206	C	DOM	O											
		5	RDU	786-333-8206	C	B	O											
Address Information		Address																
		LUBBY NAVARRO 11840 SW 177TH TER MIAMI, FL 33177-2353																

08-04	08-02	52704872215978000108795	AMERICAN 00124469147894 8004337300 TX	577.17
			LUPERON/ZOILA DEPARTURE: 08-07-22	
			P.O.S.: SALES TAX: \$0.00	
			MIA AA B PUJ AA B MIA	
08-04	08-02	52704872215978000108803	AMERICAN 00124469147902 8004337300 TX	577.17
			GONZALEZ/LUBBY MS DEPARTURE: 08-07-22	
			P.O.S.: SALES TAX: \$0.00	
			MIA AA B PUJ AA B MIA	

When NAVARRO turned in her reconciliation paperwork for the Travel Card for August 2022, the statement was clearly doctored in a scheme to defraud by removing the passenger names and departure dates for this unauthorized air travel to Punta Cana, Dominican Republic. See below snippet (as compared to the original above) from the August 2022 bank statement turned in by NAVARRO.

08-04	08-02	52704872215978000108785	AMERICAN 00124469147894 8004337300 TX	577.17
			P.O.S.: SALES TAX: \$0.00	
			MIA AA B PUJ AA B MIA	
08-04	08-02	52704872215978000108803	AMERICAN 00124469147902 8004337300 TX	577.17
			P.O.S.: SALES TAX: \$0.00	
			MIA AA B PUJ AA B MIA	




Judge's Initials *VP*
 Affiant's Initials *[Signature]*
 Co-Affiant's Initials *[Signature]*

CONCLUSION

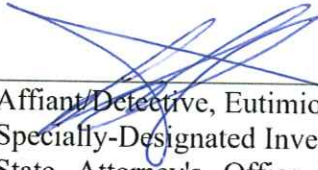
This investigation revealed that NAVARRO utilized her P-Card and Travel Card for the purchases of multiple unauthorized items and made no attempts to report, return or reimburse the Miami-Dade County Public Schools for said items upon her resignation from her position as Vice-Chair/School Board Member of District 7 with the Miami-Dade County School Board. According to sworn statements provided by the witnesses noted above and the records obtained and analyzed as part of the investigation, in 2022¹² NAVARRO made unauthorized purchases using her P-Card in the amount of **\$92,047.92** and using her Travel Card in the amount of **\$9,061.55**, totaling **\$101,109.47**. These unauthorized purchases were not for materials or supplies needed for the day-to-day operation of the Miami-Dade County School Board or in connection with School Board approved or school related activities that benefit the School District, nor did the purchases serve a valid or proper public purpose. Instead, the purchases made by NAVARRO were for personal gain in an organized scheme to defraud the Miami-Dade County Public Schools and permanently deprive Miami-Dade County Public Schools from these public funds.

WHEREFORE, for the foregoing reasons, there is probable cause to believe that NAVARRO committed grand theft in the second degree and third degree for her unauthorized uses of the P-Card and Travel Card, respectively, and scheme to defraud in the first degree and third degree for her unauthorized uses of the P-Card and Travel Card. Your Affiants request that a


¹² And July to December of 2021 for Apple purchases only.

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Co-Affiant's Initials 

warrant for the arrest of LUBBY NAVARRO, be issued for two (2) counts of Scheme to Defraud in violation of Florida Statutes §817.034, and two (2) counts of Grand Theft in violation of Florida Statutes §812.014.

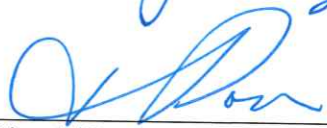

#0947

Affiant/Detective, Eutimio Cepero
Specially-Designated Investigator
State Attorney's Office Public Corruption Task
Force



Co-Affiant/Special Agent, Jose R. Gonzalez
Miami-Dade County Office of Inspector General

Sworn to and subscribed before me, this 10 day of January, 2024.



Circuit/County Judge
Eleventh Judicial Circuit of Florida
TERESA Pooler

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Affiant's Initials 
Co-Affiant's Initials 