




Memorandum



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To: The Honorable Daniella Levine Cava, Mayor, Miami-Dade County
The Honorable Jose “Pepe” Diaz, Chairman
and Members, Board of County Commissioners, Miami-Dade County

From: Felix Jimenez, Inspector General 

Date: November 3, 2022

Subject: Ten Individuals Charged in Cheating Scheme Involving the State of Florida
Elevator Safety Certificate of Competency Exam, Ref. IG21-0008-I

A joint investigation by the Miami-Dade County Office of the Inspector General (OIG), the Miami-Dade Police Department, and the Miami-Dade State Attorney’s Office, resulted in ten arrest warrants issued today for former employees of Oracle Elevator Company (Oracle) and Schindler Elevator Corporation (Schindler). Six former Oracle mechanics and two former Schindler mechanics were involved in a scheme to cheat on the State Elevator Certification exam. Steering the scheme was a former Oracle warehouse employee (who was also fraudulently licensed) and a former supervisor, who at different times worked for both companies. The ten individuals were charged with Cheating and Organized Scheme to Defraud, both third-degree felonies. Nine of the ten are in custody, and the remaining individual has arranged to surrender on the warrant.

These arrests stem from the OIG’s review of elevator safety at Miami International Airport (MIA) based on a referral from the County’s Internal Services Department regarding bypassed safety devices found on moving walkways at MIA. During that review, which is still ongoing, an attorney for a labor union of elevator workers furnished the OIG, the Mayor’s Office, the Florida Department of Business and Professional Regulation (DBPR), Oracle, and others with a detailed affidavit alleging, in part, the cheating scheme.¹ OIG investigators corroborated most of the information and identified additional mechanics fraudulently licensed, some of which are still under investigation.

Miami-Dade County had a contract with Oracle to provide maintenance and repair of the elevators, escalators, and moving walkways at MIA.² Pursuant to the contract, the Miami-

¹ Upon receiving the affidavit, Oracle terminated all employees allegedly involved. Schindler also terminated the mechanics and the supervisor, who was at the time working for Schindler, due to the allegations raised in the affidavit.

² The County terminated its contract with Oracle on June 10, 2022.

Dade Aviation Department (MDAD) paid Oracle based on labor rates established in the contract. Those rates of pay differ depending on the job classification of the service workers. Certified Elevator Technicians, licensed by the State of Florida, are paid at a higher rate than unlicensed apprentices or helpers.

Many of the employees hired to work at MIA were recruited by Oracle from Puerto Rico, which does not require the licensing of elevator mechanics. The OIG learned from Oracle employees that Oracle pressed them to get licensed. In addition, once the bypassed safety devices were first discovered, MDAD and the County's Office of Elevator Safety conducted multiple inspections of all moving conveyances at MIA. County Elevator Safety inspectors demanded proof of licensure from Oracle mechanics working at MIA and found that some were unlicensed "helpers."

As detailed in the attached arrest affidavit, Gabriel Alfonso, a former Oracle warehouse employee with no experience in elevator maintenance or repair, became a middleman between the mechanics and then Oracle supervisor, David Valles-Gomez, who took the test for the mechanics. The unlicensed mechanics registered with Elevator World, Inc., the exam administrator for the State of Florida and provided the username and password to Mr. Alfonso. Mr. Valles-Gomez took the exams using the identifiers provided by the mechanics. Mr. Alfonso and Mr. Valles-Gomez charged between \$250 and \$400 for each exam and split the fee. The OIG found that at some point during the scheme, Mr. Valles-Gomez cut out Mr. Alfonso as the middleman and pocketed the entire fee to take a test.

The employees used the falsely obtained State Exam Certification to fraudulently acquire annual Certificates of Competency in elevator repair and maintenance from DBPR. Moreover, the phony Exam Certification was relied on by Oracle. Pursuant to its work at MIA, Oracle billed MDAD at a higher contractual rate of pay for four fraudulently licensed Oracle mechanics assigned to MIA. For invoices dated January 31, 2020, through October 31, 2020, MDAD paid Oracle \$24,030. Of that amount, \$2,937 was overpaid for fraudulently licensed mechanic work. It is expected that this number will increase as the financial review is broadened.

Although the OIG's investigation continues, remedial measures have been taken to correct issues identified. Elevator World, the State of Florida's exam administrator, has instituted more stringent on-line exam verification and proctoring protocols. In part, the scheme was able to flourish due to lax verification of the test taker by the exam administrator. Also, once the bypassed safety devices were first discovered, inspectors from MDAD and from the County's Office of Elevator Safety conducted multiple safety inspections of all moving conveyances at MIA. To date, regular inspections, maintenance, and repairs of over 600 conveyances at MIA continue and no additional bypass devices have been discovered. As previously stated, the OIG investigation into the bypass devices is ongoing.

The OIG appreciates the assistance of MDAD; the Internal Services Department's Office of Elevator Safety; the Florida Department of Business and Professional Regulation; and its law enforcement partners, the Miami-Dade Police Department and State Attorney's Office. Attached is a copy of the arrest warrant affidavit that presents the evidence underlying the cheating scheme and a copy of the State Attorney's press release.

Attachment

cc: Jimmy Morales, Chief Operations Officer, Office of the Mayor
Ralph Cutié, Director, Miami-Dade Aviation Department
Alex Muñoz, Director, Internal Services Department
Namita Uppal, Director, Strategic Procurement Department
Cathy Jackson, Director, Audit and Management Services Department
Yinka Majekodunmi, Commission Auditor, Office of Commission Auditor
Jennifer Moon, Chief, Office of Policy and Budgetary Affairs



KATHERINE FERNANDEZ RUNDLE

STATE ATTORNEY



ELEVENTH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY

FOR IMMEDIATE RELEASE

10 Charged in Cheating Scheme to Fraudulently Obtain State Certificates of Competency in Elevator Repair

Miami (November 3, 2022) - State Attorney Katherine Fernandez Rundle and Miami-Dade County Inspector General Felix Jimenez announce the charging of 10 individuals involved in a scheme to obtain State of Florida Certificates of Competency required for elevator mechanics working in our community without taking the required online, open-book examinations. Allegations of impropriety were brought to the attention of the Miami-Dade County Inspector General's Office and an investigation was immediately initiated in conjunction with the Miami-Dade State Attorney's Office.

"The personal safety of every individual in Miami-Dade County must always be a paramount concern. When someone tries to shortcut a public safety requirement or certification, they go out of their way to create an unnecessary risk," said State Attorney Katherine Fernandez Rundle. "This alleged cheating scheme by trained technicians cannot and will not stand. I applaud the actions of the Miami-Dade County Inspector General's Office for their hard work in uncovering this scheme and working to ensure the public's safety."

It is alleged that Gabriel Alfonso and David Valles-Gomez orchestrated a test-taking operation in which, for a price, Valles-Gomez would take the online competency exam in the name of another individual, thereby acquiring for that individual a Florida Certification of Completion of the State exam. The mechanics then used the fraudulent exam document to obtain a Florida Certificate of Competency in elevator repair. Most of the mechanics had previously worked on elevators, escalators and moving sidewalks in areas where certification of the type required in Florida was not a requirement. It is alleged that Gabriel Alfonso acted as the middleman, collecting a fee ranging between \$250 to \$400, of which \$200 to \$300 would go as payment to Valles-Gomez for taking the test. Upon the discovery of this alleged scheme, all work undertaken by these individuals on Miami-Dade County property was reinspected by Florida Certified elevator mechanics.

Charged today are Gabriel Alfonso, David Valles-Gomez, Xael Concepcion-Vargas, Jose Cuevas-Romero, Ramon Fleitas, Marcos Garcia, Hugo Marte, Gabriel Ortiz, Jose Tirado-Blanco and Frederick Williams. All 10 defendants are charged with 1 count of Organized Scheme to Defraud under \$20,000. They are also charged with criminal Cheating.

Alfonso and Valles-Gomez are each charged with 8 counts of Organized Scheme to Defraud under \$20,000 due to their alleged roles in making the overall scheme work, while the remaining individuals are each charged with 1 count. Additionally, Alfonso and Valles-Gomez are charged with 8 counts of statutory Cheating for their roles in making the alleged scheme work while the remaining individuals are each charged with 1 count of Cheating. All the charges are 3rd degree felonies.

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**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE, FLORIDA**

STATE OF FLORIDA)
) ss
COUNTY OF MIAMI-DADE)

STATEMENT OF FACTS IN SUPPORT OF ARREST WARRANT

Before me, *R. David Head*, a Judge of the Circuit Court of the Eleventh Judicial Circuit of Florida, personally appeared, Special Agent Javier R. Montero of the Miami-Dade County Office of the Inspector General (OIG), who being first duly sworn, states that he has probable cause to believe, and does believe, that:

**DAVID V. VALLES-GOMEZ (VALLES),
GABRIEL ALFONSO (ALFONSO),
XAEL CONCEPCION-VARGAS (CONCEPCION),
JOSE CUEVAS-ROMERO (CUEVAS),
RAMON FLEITAS (FLEITAS),
MARCOS GARCIA (GARCIA),
HUGO MARTE (MARTE),
GABRIEL ORTIZ (ORTIZ),
JOSE TIRADO-BLANCO (TIRADO),
FREDERICK WILLIAMS (WILLIAIMS),**

did knowingly, unlawfully and willfully commit the following offenses:

DEFENDANTS	STATUTE	CRIME	DEGREE FELONY
All 10 Defendants	817.034	Organized Scheme to Defraud - under \$20K	THIRD DEGREE FELONY
GABRIEL ALFONSO PERSON UNKNOWN #1	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO XAEL CONCEPCION	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO JOSE CUEVAS	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES RAMON FLEITAS	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO MARCOS GARCIA	817.29	Cheating	THIRD DEGREE FELONY

Judge's Initials *RDH*

Affiant's Initials *JRM*

DAVID VALLES GABRIEL ALFONSO HUGO MARTE	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO GABRIEL ORTIZ	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO JOSE TIRADO	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO FREDERICK WILLIAMS	817.29	Cheating	THIRD DEGREE FELONY

AFFIANT'S BACKGROUND

Your Affiant is employed as a Special Agent with OIG. Your Affiant has held this position since January 2022. Prior to being hired by OIG, your Affiant was a sworn Special Agent for twenty-four years with the Social Security Administration (SSA) Office of the Inspector General. My responsibilities included investigations of fraud, waste and abuse as it related to the SSA. I have also participated in the execution of arrest and search warrants during the course of that employment.

Miami-Dade County Office of the Inspector General

While your Affiant is not a sworn law enforcement officer, the OIG is a Criminal Justice Agency authorized by Section 2-1076 of the 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 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 Affiant's personal participation in this investigation and/or review of reports, oral and written, given to him, your Affiant's review of relevant records, and your Affiant's training and experience, your Affiant is familiar with the circumstances of the offenses described in this affidavit. Within this affidavit, your Affiant has not included every fact known to him concerning this investigation. Instead, your Affiant has stated only the facts he believes establish the necessary foundation and probable cause for the arrest of David V. Valles Gomez, Gabriel Alfonso, Jose Cuevas, Xael Concepcion Vargas, Jose Tirado Blanco, Marcos Garcia, Hugo Marte, Gabriel Ortiz, Frederick Williams, and Ramon Fleitas.

INTRODUCTION

This investigation was initiated based on a referral from the Miami-Dade County Internal Services Department (ISD) in March 2021. The International Union of Elevator Constructors (the Union) filed a complaint with ISD regarding bypassed safety devices on moving walkways at Miami International

Airport (MIA). Later in September 2021, the Union provided additional information, alleging that several mechanics employed at Oracle Elevator and two additional mechanics employed at Schindler Elevator had participated in a scheme to cheat on the State of Florida Elevator Competency exam and fraudulently obtain a State of Florida Certificate of Competency license from the Florida Department of Business and Professional Regulation (DBPR). This Union-supplied information included a sworn affidavit of Gabriel Alfonso and an 81-page attachment. This attachment included copies text messages, photos documenting online cash transfers through various money transfer applications, copies of Certificates of Completion from Elevator World, Inc (the company which administers the State of Florida online exam), and screenshots of usernames and passwords texted from the elevator mechanics to Gabriel Alfonso and/or from Gabriel Alfonso to David Valles.


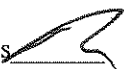
Through interviews and documentary evidence, the investigation corroborated the Alfonso information provided by the Union and determined that the defendants named above cheated on the State exam by having someone else take the exam for them. That person was identified as an Oracle (now former) supervisor, David Valles. Armed with the fraudulent Certificate of Completion of the State exam, the Certificates were furnished to DBPR, thereby defrauding the State of Florida, by causing the issuance of Certificates of Competency licenses, to which the mechanics were not entitled. Many mechanics also received pay increases from their employer based upon the fraudulent licenses. Because some were working pursuant to the Oracle/county contract at MIA to maintain and repair its moving walkways, elevators, and escalators, these increased costs were passed on by Oracle to the county.

Valles (the exam taker), Alfonso (often the middleman), and most all of the mechanics admitted to the fraudulent scheme in sworn statements to OIG investigators. Fleitas is the only defendant who maintained that he actually took the exam himself. The admissions are corroborated in whole or in part by documentary evidence, detailed below. Fleitas claimed that he took his own exam and denied Valles's participation. However, your affiant has probable cause to believe that Mr. Fleitas was not truthful in this claim based upon evidence detailed below.

DPBR ELEVATOR LICENCING REQUIREMENTS

Anyone applying to obtain a Certificate of Competency from DBPR related to elevator repair and maintenance must:

- Show proof of a Mechanical Engineer license in good standing, OR
- Show **proof of four years verified work experience** constructing, maintaining, servicing, and repairing elevators AND
- One of the following, as listed in 399.01(16)(a), Florida Statutes:
 - Completion of a registered elevator mechanics apprenticeship with standards substantially equal to a national training program, OR
 - Licensure by a state or local U.S. jurisdiction with standards equal to or more stringent than Florida, OR
 - **Successful passage of an approved certificate of competency exam**, mechanics exam, or elevator technician exam within 2 years of date of application.



The applicant must also provide proof of insurance.

In this case, the mechanics signed the DBPR application, and either forwarded it themselves or caused another to forward the application with attachments to DBPR. The attachments included:

- (1) Company Letters from employers and former employers certifying the requisite hours of experience. The letters are on employer letterhead and generally signed by someone in the employer's or former employer's human resources department.
- (2) Fraudulent Certificates of Completion issued by Elevator World, Inc., the company which is contracted to provide the State of Florida exam.
- (3) Certificates of Insurance from their employers.
- (4) \$50 payment fee to DBPR.

In response thereto, DBPR issued Certificates of Competency to which the mechanics were not entitled. Once initial certification is obtained, it is renewed yearly. All licenses expire 12/31 of each year. To renew, a mechanic submits:

- (1) a renewal application,
- (2) proof of continuing education,
- (3) proof of insurance,
- (4) \$50 fee.

DBPR relies on the initial Certificate of Completion of the state exam. Had DBPR know the Elevator World Certificates were fraudulent and obtained via cheating, DBPR would not have approved the initial license, nor any subsequent renewals. The specific dates the applications were signed, received by DBPR, and dates licenses issued are contained in Chart 2, below.

ELEVATOR WORLD EXAM PROCEDURES

At all times material to this affidavit, the State of Florida Certificate of Competency Exam was taken online. The State of Florida contracted with an online Alabama company, Elevator World, Inc., to administer the exam. The exam costs \$95 and applicants must follow the exam site instructions to successfully complete the exam. After accessing the Elevator World website, an applicant pays the fee and creates a username and password. The applicant can either immediately take the exam or take the exam in the future by logging back into the exam site with the applicant's username or password.

Prior to taking the exam, the applicant must certify that he/she is accurately identified as the person taking the exam. Applicants have three (3) hours once one has started to complete the exam. The exam contains 50 multiple choice questions randomly selected from a database of over 750 questions. This exam is an open book exam, and exam takers can consult written documentation in answering the questions.

Unfortunately, at the time of the exams at issue in this affidavit, Elevator World did nothing to proctor the online exam to ensure that the person logging in to take the exam is the actual person in whose name the exam was being taken. According to most statements, the exam is only given in English. Your affiant notes that most of the elevator technicians at issue in this affidavit spoke little English. Your affiant notes that Elevator World has updated its exam-taking procedures recently, and now the identity of the exam taker is verified via the exam taker's computer video camera.

STATEMENT OF GABRIEL ALFONSO

In addition to reviewing his sworn affidavit submitted to Miami-Dade County by the Union, your affiant has taken a sworn voluntary statement from Alfonso on July 19, 2022. The sworn statement was audio recorded. According to Alfonso, he was hired by Oracle on or about December 2018. Alfonso worked in Oracle's warehouse and assisted repairmen with obtaining parts needed from the Oracle warehouse. Alfonso never worked as an elevator helper or repairman and had no experience in the field of maintenance or repair. He is also not a mechanical engineer. As such, he was wholly unqualified to be granted a Certificate of Competency from DBPR, whether or not he passed a exam. He did not hold the requisite 4 years' experience.

Nevertheless, a State of Florida Elevator World exam was taken in Alfonso's name on 2/23/2020. Your affiant notes that David Valles did NOT take this exam. Alfonso provided information on another individual, referred to herein as Unknown Person #1. The identity of Unknown Person #1 is currently under investigation.

After Unknown Person No. 1 took and passed the online exam in Alfonso's name, Alfonso caused a DBPR application to be submitted for a Certification of Competency on 3/2/2020. Attached to the application was a company letter on Oracle Letterhead, fraudulently attesting to hours worked as a repairman at Oracle by Alfonso. According to Alfonso and other coworkers, he did not have repair or maintenance experience—Alfonso worked in the warehouse. Further, the questioned Oracle company letter does not use the same form or verbiage as used by Oracle in other company letters submitted to DBPR regarding the other defendants listed herein. The letter is not signed by an Oracle human resources employee, as are all the other letters. Instead, the letter is purportedly signed by a local Oracle supervisor, Todd Trnka. Your affiant notes that the signature of Trnka on the letter does not appear similar to his signatures connected to his Florida driver licenses. According to Alfonso, he turned in his fraudulent Elevator World Certificate of Completion to Oracle, signed the DBPR application, and Oracle "took care of the rest." Shortly thereafter, Alfonso says he received his Florida Certificate of Competency.

According to Alfonso, upon obtaining his Certificate of Competency, he sought a pay raise from Oracle. Because Oracle did not pay him as they did all other certified mechanics, he quit. Alfonso, though, stated that Oracle did use him as a "supervisor" on site at Miami International Airport, supposedly overseeing other employees who may have had the experience, but did not have a Florida certificate of competency. Per Alfonso, this was done because the County was requesting proof of certification



from mechanics working on county devices: moving walkways, elevators, and escalators at Miami International Airport. Your affiant notes that Alfonso was barred from the secure side of MIA, due to his prior felony convictions.

According to Alfonso, when the County began requesting proof of State Certification at the airport, Oracle made a big push to get helpers certified with the State of Florida. Alfonso stated that many Oracle employees were hired from Puerto Rico, to work at the Airport. While the workers may be experienced elevator repairmen in Puerto Rico, Puerto Rico does not have licensing for elevator repair such as exists in Florida. Further, most mechanics lack English language skills, and the exams are given in English.

Per Alfonso, Alfonso acted as the middleman in this scheme, between the elevator repairmen and the exam taker, Valles. Alfonso stated that Valles was an Oracle supervisor and also conducted continuing training for Oracle. During his statement, Alfonso affirmed he and Valles assisted at least seven (7) individuals to obtain a Certificate of Competency for which they were not entitled. Alfonso advised the names of the individuals are as follows¹:

- Jose Cuevas
- Xael Concepcion
- Marcos Garcia
- Jose Tirado Blanco
- Gabriel Ortiz
- Hugo Marte
- Frederick Williams

Per Alfonso, he received the usernames and passwords from the mechanics and forwarded them to Valles. After Valles provided an Elevator World Certificate of Completion in the mechanic's name, certifying the successful completion of the State of Florida exam, Alfonso forwarded a copy of the Certificate to the Mechanic. Upon receipt, the mechanic would send money to Alfonso via a cash transfer app such as Zelle or CashApp. Alfonso then transferred a portion of the money to Valles, after taking his cut. Your affiant notes that Alfonso ceased working for Oracle on or about April 6, 2021.

TEXT MESSAGE EVIDENCE

According to Alfonso, he received the mechanic username and password information via text message from the mechanic, which Alfonso subsequently forwarded to Valles. Alfonso identified the text messages contained in the 81-page attachment to his original affidavit as authentic. After Valles successfully passed the Florida exam, he took a picture or screen shot of the certificate of completion generated by Elevator World and sent the picture/screenshot to Alfonso via text message. Alfonso then sent the picture to the respective mechanics. These photos and text messages were included in

¹ Your affiant notes there is no evidence that Alfonso acted as a middleman regarding Oracle employee Ramon Fleitas. Records show that Fleitas paid Valles directly.

his original affidavit submitted to Miami-Dade County by the Union and identified by Alfonso to your Affiant as authentic.

THREE STATEMENTS OF VALLES

March 7, 2021 Statement

During the course of this investigation, Valles was interviewed three times by OIG Agents. In all cases he swore to tell the truth and the statements were audio recorded. The first interview was on March 7, 2022, when Valles voluntarily appeared at OIG offices with his attorney. Valles explained he worked for Oracle for approximately 6 years. During the course of his employment, he obtained his Florida Certified Elevator Technician license and obtained a college degree in Electrical Engineering. After earning his degree, Oracle promoted him to supervisor overseeing the service and repair work of elevator mechanics. When Oracle won the MDAD repair and maintenance contract, Valles transferred to the Miami office as a service manager until he left Oracle employment in 2021. Valles stated he was never assigned to work at MDAD nor did he supervise those employees. While he was issued an MDAD identification badge so that he could perform surveys of the pre-existing conditions of the equipment at MDAD, other supervisors performed those surveys. Valles explained Oracle also gained contracts at Port Miami and Miami-Dade County Transit. He was reassigned to perform surveys of that equipment.

Regarding licensing, Valles recalled the mechanics were slow to obtain their licenses and a deadline was approaching. Valles initially stated he assisted the mechanics who needed a license with setting up their accounts, the log-in process, and purchasing the exam. Valles said there were approximately 20 mechanics that were having various issues with obtaining the required license. A few mechanics continued to struggle with the exam due to their English. Other mechanics did not understand the questions or did not use the books. Valles stated he sat with one mechanic at the Oracle offices in Miami to take the exam. Valles did not recall this mechanic's name. Valles stated he assisted Alfonso obtain a license, and later Alfonso contacted him to assist other Oracle employees by taking the exams for them. According to Valles, Alfonso paid him approximately \$150 per exam. Valles stated he believed he assisted 4 or 5 employees and he did not want them to know he was the person taking the exam. Therefore, the employees paid Alfonso, and Alfonso forwarded the money to him. Valles stated he took the exams from his home on his personal computer. He did not recall the names of the employees.

Valles stated after separating employment from Oracle, he became a supervisor at Schindler until he was let go due to licensing allegations at Oracle. Valles admitted to assisting Schindler employee Hugo Marte to obtain his license. He referred Marte to Alfonso. Valles admitted he took Marte's exam. Valles stated he recognized Frederick Williams name but did not recall taking his exam. Valles never mentioned Ramon Fleitas.

Valles stated that he owned a company, Vertical Engineering, which provided continuing education classes, an annual renewal requirement of DBPR. While still employed at Oracle, he was hired through his company to provide continuing education to Oracle licensed mechanics. He stated that Oracle management knew his wife owned Vertical Engineering and that Valles was the course instructor. Valles stated his wife has no elevator repair experience and is not licensed. Her only role, other than administrative, was to appear on corporate registration documents.

June 24, 2022 Statement

Valles' second statement was on June 24, 2022. This interview occurred at Valles' attorney's office. Valles swore to tell the truth and the statement as audio recorded. Valles explained the new Oracle elevator mechanics recruited in Puerto Rico were aware of and had agreed to obtain a State of Florida Certificate of Competency (CC) license. The deadline established by Oracle to get the elevator mechanics licensed was approaching and some of them had not secured their CC certification.

Valles was asked to explain how this all started. Valles explained around the same time tensions were rising at Oracle for mechanics to get licensed, he began asking around at work if anyone knew someone who could help him with a home improvement project (removal of a popcorn ceiling). Gabriel Alfonso said he had a construction business and offered his services to complete the popcorn removal. During one of Alfonso's visits to Valles' residence, he mentioned that some of the mechanics did not speak English and needed assistance with the CC exam, but nothing came of it.

Valles described the tension as high at Oracle due to the jumpers used to bypass safety devices were discovered on conveyances at Miami-Dade Aviation Department (MDAD). Oracle was a non-union company, and they were also being pressured from the International Union of Elevator Constructors to unionize their elevator mechanics. Further, Valles stated that Oracle knew they were under immense pressure to get all their elevator mechanics certified and had to assign them to certified elevator mechanics on staff to be able to work under their license as an apprentice. Oracle's management were conducting numerous meetings about the jumped/bypassed safety devices, the CC certification requirement, and the union pressure. Valles specifically recalled Oracle Supervisor Todd Trnka telling the elevator mechanics that they had to work on getting their licenses.

Valles explained that Alfonso kept approaching and asking him about helping the elevator mechanics get the CC certification. According to Valles, Alfonso made an emotional appeal and convinced him to take the exam for several of the mechanics. Valles does not recall who took the CC exam for Alfonso. Valles believes he took the CC exam for approximately five or six mechanics. After being shown an excel spreadsheet, and screenshots of text messages between himself and Alfonso, he admitted to taking the CC exam for seven mechanics: Jose Cuevas, Xael Concepcion, Jose M. Tirado Blanco, Marcos Garcia, Hugo Marte, Gabriel Ortiz, and Frederick Williams. Valles further admitted to receiving cash in the form of Zelle transfers from Alfonso in the range of \$200 to \$300 for each CC exam he took for the above-referenced individuals.

According to Valles, after he successfully passed the CC exam for the mechanics, he took a cell phone photo of the certificate of completion and forwarded it to Alfonso. Valles believes that the first exam he took (Jose Cuevas) might have been done at Oracle offices and the others were done on his home computer/laptop at his residence. Valles did not inquire or question the elevator mechanics about their knowledge, skills, and abilities in the elevator industry, nor of their job responsibilities at Oracle prior to taking the exam on their behalf.

Valles stated Alfonso did not have the necessary knowledge, skills, abilities, or training to perform the job of an elevator mechanic. He knew Alfonso, who delivered elevator parts and equipment for Oracle. Further, Valles believed Alfonso, due to his background, could not qualify for a Customs seal, which is required to access certain secure and sensitive areas at MIA to work on elevator equipment.

Valles was shown a copy of his J.P. Morgan Chase bank statements. Valles was shown Zelle deposits into the account from a person by the name of Megan Gonzalez. Alfonso and Gonzalez are joint account holders of a Bank of America account. Valles denied knowing anyone with that name. However, he did recognize and acknowledge the fact that the dates of the Zelle deposits match the dates Mr. Alfonso transferred money to him for taking the exam for the mechanics.

Your affiant notes that after investigating IP addresses used to take the State of Florida exam on the Elevator World website, your affiant identified other mechanics whose exam was likely taken by Valles. One of these mechanics is Ramon Fleitas. Valles never mentioned him, nor the other newly discovered mechanics under investigation, in his two statements.

October 18, 2022 Statement

Valles' attorney contacted your affiant and indicated that Valles wanted to meet again to clear up some issues. On **10/18/2022** your affiant met with Valles and his attorney at the attorney's office. Valles was sworn to tell the truth. The statement was audio recorded. Valles advised he wanted to clarify a previous statement that there was no pressure on him to assist the mechanics with their tests. Valles stated unlicensed mechanics were a constant topic of discussion in the office and there were weekly meetings. Mike West of Oracle held meetings with Todd Trnka and wanted Trnka to resolve the issue of unlicensed mechanics. Valles stated he believed it was implied that he take the exams on behalf of the mechanics. Valles explained he took the time to understand the process to obtain a state license and the renewal process. According to Valles, Trnka treated him like a CC consultant and referred the unlicensed mechanics to him for assistance. Valles stated a collections/office manager also referred mechanics to him. She is the person who gathered all the paperwork and sent it to DBPR for the mechanics. Valles claims it was this pressure from these two Oracle employees that caused him to take the first exam for a mechanic. Valles stated Gabriel Alfonso also asked him to assist the unlicensed mechanics.

When asked if the reason Oracle hired his company to give continuing education classes to their employees, was because Oracle knew he was cheating on the tests for its mechanics, Valles denied it. He stated he is passionate about continuing education classes, however, many of those that attended the training would sleep during the eight-hour training.

Valles did not want to discuss any new information and terminated the interview.

ELEVATOR WORLD EVIDENCE

Records obtained from Elevator World disclosed Valles accessed his own profile on June 20, 2020, with an IP address of **50.77.121.149**. This IP address also accessed the Elevator World profiles of Marcos Garcia, Jose Cuevas, and Xael Concepcion on various dates. Furthermore, your affiant discovered via subpoenaed documents that this IP address also accessed the Bank of America (BOA) account of Vertical Engineering, which is registered to Valles' wife and the address of record is Valles' residence. Your affiant notes that this IP address is subscribed to via a Comcast Business account. According to Comcast records, this IP address was assigned to Oracle Elevator, with a service address



of 8000 NW 25 St, Suite 400, Doral, FL 33122. Billing address is listed as Oracle's Tampa offices. The type of service provided is internet. The service start date is 11-1-2018.

Gabriel Ortiz's Elevator World account was accessed with IP address **67.38.15.67**. This IP address also accessed the Vertical Engineering Corporation's Bank of America account. Again, Vertical Engineering is a company owned by David Valles. In addition to accessing Ortiz's Elevator World account, your affiant notes that this IP address was also used to take the Elevator World State of Florida exam of Gabriel Ortiz, Hugo Marte, Frederick Williams, and Ramon Fleitas (see chart below). As stated above, Valles has admitted taking the exam for Ortiz, Marte, and Williams.

Below is a summary of the information received from Elevator World, pursuant to subpoena. This Chart shows the name of the mechanic, the date of the State of Florida exam, the exam start and end times, and the IP address associated with the person taking the exam. The chart also indicates prior failed exams by mechanics:

Chart 1: Elevator World Exam Dates and Associated IP Address

Name (mechanics)	Exam Date	Exam Time (start)	Exam Time (end)	IP address
Tirado, Jose (failed exam)	10/05/19	4:17:41PM	7:17:51PM	98.242.182.136
Tirado, Jose (failed exam)	05/21/20	6:45:44PM	8:34:36PM	137.103.229.191
Cuevas, Jose	06/04/20	8:33:51PM	10:28.:26PM	98.254.87.13
Concepcion, Xael	06/09/20	10:13:23PM	12:57:24AM	98.254.87.13
Tirado, Jose (pass exam)	06/11/20	10:48:00 AM	12:54:39AM	98.254.87.13
Garcia, Marcos	06/13/20	not provided	11:54:26PM	98.254.87.13
Ortiz, Gabriel	07/02/20	not provided	10:11:07PM	67.38.15.67
Alfonso, Gabriel	02/23/20	not provided	12:57:36PM	172.58.12.176
Marte, Hugo (failed exam)	02/09/20	6:48:34PM	9:27:18PM	71.196.39.187
Marte, Hugo (pass exam)	07/01/20	10:06:42PM	11:47:15PM	67.38.15.67
Williams, Frederick	07/11/20	5:09:34PM	6:10:36PM	67.38.15.67
Fleitas, Ramon	02/15/21	not provided	10:44:15PM	67.38.15.67

Your affiant notes that the IP address of **98.254.87.13** was used to take the exam of Cuevas, Concepcion, Tirado and Garcia (see above chart). Valles admits taking the exam for all of these mechanics. Further, the mechanics admit that someone else took the exam on their behalf.

STATE OF FLORIDA DBPR EVIDENCE

Your affiant subpoenaed DBPR for the licensing files related to the defendants. Records indicate that the fraudulent certificates of completion from Elevator World were submitted to DBPR by the defendants or someone on the defendant's behalf. Based in part upon that fraudulent Certificate of Completion, a State of Florida Certificate of Competency and/or Certification of Elevator Technician was issued. In many cases, these certifications which are only valid for at most 12 months, were renewed by the

defendant at issue. The renewals were granted, in part, in reliance on the original and fraudulent Elevator World Certificate of Completion on file with DBPR.

The below chart lists the defendant's names, the State of Florida certification number, the date of application receipt, and the date of certification.

Chart 2: Summary of DBPR Licensing Information

Defendant	Original or Renewal	Date DBPR Application Signed by Applicant	Date Appl Received by DBPR	CC/CET License number	Date CC/CET Issued	Expires	MISC
Gabriel Alfonso	Original	2/25/2020	3/2/2020	CC4825	3/3/2020	12/31/2020	Questioned Oracle Company Letter signed by "Todd Trnka"
Gabriel Alfonso	Renewal	10/5/2020	10/13/2020	CC4825	11/3/2020	12/31/2021	Includes CET
Jose Cuevas	Original	6/5/2020	6/10/2020	CC4910	7/5/2020	12/31/2020	
Jose Cuevas	Renewal	9/12/2020	10/23/2020	CC4910	11/4/2020	12/31/2021	Includes CET
Jose Cuevas	Renewal	Unsigned card	11/30/2021	CC4910	12/5/2021	12/31/2022	Includes CET
Xael Concepcion	Original	6/16/2020	6/22/2020	CC4918	7/7/2020	12/31/2020	
Xael Concepcion	Renewal	9/12/2020	11/2/2020	CC4918	11/12/2020	12/31/2021	Includes CET
Xael Concepcion	Renewal	11/16/21 online	11/16/2021	CC4918	1/3/2022	12/31/2022	Includes CET
Marcos Garcia	Original	6/15/2020	6/18/2020	CC4913	7/5/2020	12/31/2020	
Marcos Garcia	Renewal	9/12/2020	10/19/2020	CC4913	11/4/2020	12/31/2021	Includes CET
Marcos Garcia	Renewal	Unsigned card	11/1/2021	CC4913	11/8/2021	12/31/2022	Includes CET
Jose Tirado	Original	6/15/2020	6/18/2020	CC4912	7/5/2020	12/31/2020	
Jose Tirado	Renewal	10/20/2020	10/27/2020	CC4912	11/5/2020	12/31/2021	Includes CET
Jose Tirado	Renewal	11/19/21 online	11/19/21 online	CC4912	1/11/2022	12/31/2022	Includes CET
Gabriel Ortiz	Original	7/23/2020	8/31/2020	CC4961	9/7/2020	12/31/2020	
Gabriel Ortiz	Renewal	10/20/2020	11/3/2020	CC4961	11/15/2020	12/31/2021	Includes CET
Gabriel Ortiz	Renewal	Unsigned card	11/30/2021	CC4961	12/5/2021	12/31/2022	includes CET

Hugo Marte	Original	7/4/2020 online	7/4/2020 online	CC4916	7/7/2020	12/31/2020	
Hugo Marte	Renewal	11/19/2020 online	11/19/2020 online	CC4916	11/22/2020	12/31/2021	??
Hugo Marte	<i>admin complaint</i>	<i>n/a</i>	<i>n/a</i>	<i>CC4916 invali- dated</i>	<i>n/a</i>	<i>n/a</i>	<i>Self-Reported to DBPR</i>
Hugo Marte	Original			CC5285		12/31/2022	retook exam
Frederick Williams	Original	11/19/2020	2/18/2021	CC5296	3/29/21	12/31/2021	
Frederick Williams	Renewal	11/19/2021	Not stamped	CC5296	11/30/21	12/31/2022	
Frederick Williams	<i>Admin complaint</i>	11/8/21	<i>n/a</i>	<i>CC5296 invali- dated</i>	<i>n/a</i>	<i>n/a</i>	<i>Self-Reported to DBPR</i>
Ramon Fleitas	Original	2/21/2021	2/26/2021	CC5073	3/2/2021	12/31/2022	<i>Questioned Oracle Company Letter signed by "David Valles"</i>

BANK ACCOUNT EVIDENCE

Your affiant's review of Alfonso's Bank of America account ending in 4713, revealed the account was opened by Gabriel Alfonso and Megan Gonzalez. Your affiant also reviewed bank account evidence of Valles.

The below table shows a comparison to the date of the Elevator World state exam, and the date of online money transfers between the parties. As can be seen, immediately after the exam was taken by Valles, a payment was made to him for services rendered. Most payments were filtered through the middleman, Gabriel Alfonso:

Chart 3: Comparison of Test Dates and Payment Dates

Date	\$ Transfer to Alfonso	\$ Transfer to Valles	Notes
06/04/20			Jose A. Cuevas - CC exam
06/05/20	\$250.00		Zelle transfer from Jose A. Cuevas to Alfonso
06/05/20		\$200.00	Zelle transfer from Alfonso to David Valles
06/09/20			Xael Concepcion - CC exam
06/10/20	\$250.00		Zelle transfer from Xael Concepcion Vargas to Alfonso
06/10/20		\$200.00	Zelle transfer from Alfonso to David Valles

06/11/20			Jose M. Tirado Blanco - CC exam
06/12/20	\$300.00		Zelle transfer from Jose M. Tirado to Alfonso
06/12/20		\$200.00	Zelle transfer from Alfonso to David Valles
06/13/20			Marcos Garcia - CC exam
			<i>no online payment</i>
07/01/20			Hugo Marte - CC exam
07/02/20	\$394.00		CashApp from Hugo Marte to Alfonso
07/02/20		\$300.00	Zelle transfer from Alfonso to David Valles
07/02/20			Gabriel Ortiz - CC exam
			<i>no online payment</i>
07/11/20			Frederick Williams - CC exam
07/13/20	\$400.00		Zelle transfer from Frederick Williams to Alfonso
07/13/20		\$300.00	Zelle transfer from Alfonso to David Valles Gomez
02/15/21			Ramon Fleitas - CC exam
02/16/21		\$400.00	Zelle transfer from Ramon Fleitas directly to "David Supervisor Oracle."
Total:	\$1,594.00	\$1,600.00	

STATEMENTS OF ELEVATOR MECHANICS

OIG investigators interviewed the elevator mechanics at issue in this affidavit. Some mechanics initially denied involvement and claimed they took the exam themselves. However, after being confronted with the text messages and online cash payment evidence, most recanted their earlier statement and admitted they paid Alfonso for someone else to take the exam for them. Most stated that they did not learn until after an internal employer investigation that Valles was the actual exam taker, as they only dealt with Alfonso.

However, one mechanic's testimony differed. Ramon Fleitas, an Oracle employee at the time of the fraudulent licensing, denies that Valles took the exam for him. Your affiant does not believe this to be a truthful statement, based upon the circumstantial evidence. Valles' IP address was used to take the Fleitas exam. Further, there is an online cash payment from Fleitas to Valles the day after the exam was successfully passed. There is no evidence that Alfonso was involved in the Fleitas incident.

Below is a very brief synopsis of the individual defendant statements to the OIG:

Jose Cuevas

On 10/7/21, OIG investigators interviewed Cuevas. The sworn statement was audio recorded. Cuevas began his employment at Oracle Elevator Company (OEC) on or about 1/5/2019 and

worked for them at MIA. Prior to working at Oracle, Cuevas was employed at Deya Elevators in Puerto Rico for approximately eleven years, where he was not required to be licensed. Cuevas advised Oracle told him he needed to get the CC license at a meeting. Cuevas initially stated he did not own a computer; therefore, he completed the online Certificate of Competency exam at Valles' residence. Cuevas could not recall where Valles resided. After being confronted with other evidence, Cuevas stated Alfonso approached him and said he knew a guy who could take the exam for him. Cuevas sent a payment of \$250 via Zelle, to Alfonso. Cuevas stated he sent the payment after being advised by Alfonso that the exam was successfully completed. According to Cuevas, he later learned from Alfonso that Valles took the CC exam on his behalf.

Xael Concepcion

On 10/13/21, OIG investigators interviewed Concepcion. The sworn statement was audio recorded. Concepcion began his employment with Oracle on 2/3/20 and worked at MIA. According to Concepcion, he worked in the elevator industry for approximately 16 years in Puerto Rico, where no license was required. Concepcion is a former employee of Deya Elevators. Upon hiring and at later times, Concepcion was told by Oracle management that he needed a CC license. Concepcion advised Alfonso approached him and told him that for a fee of \$250, Alfonso had someone that could help him get a CC license. Concepcion said he initially thought the cost would be administrative costs, which are customary in Puerto Rico. Concepcion was shown copies of text message he sent to Gabriel Alfonso, which contained his email address, and his receipt of a text message from Gabriel Alfonso with a picture of the certificate of completion of the CC exam. Concepcion affirmed his signature appears on the State of Florida Department of Business and Professional Regulation application for a CC license. Concepcion further affirmed that he did not take the exam for this CC license. He paid Gabriel Alfonso \$250 via Zelle transfer.

Marcos Garcia

On 10/7/21, OIG investigators attempted to interview Marcos Garcia. Garcia did not consent to a voluntary interview and invoked his right to counsel. A few hours later, Garcia contacted OIG investigators and stated he wanted to be interviewed.

On 10/8/21, OIG investigators interviewed Garcia at his residence. The sworn statement was audio recorded. OIG investigators have no arrest powers and Garcia was not in custody. Garcia is a former Oracle employee who was assigned to work at MIA. He was recruited by Oracle from Puerto Rico for the job. Garcia advised he registered for the CC exam and purchased the exam; however, he did not take the exam. Instead, Garcia admitted he provided the registration details to Alfonso via text message. Garcia explained Alfonso knew someone who would take the exam on his behalf. According to Garcia, he did not pay Alfonso at the time, as Alfonso said he would let Garcia know the cost later, but he never did. Garcia said he later heard rumors that Valles took CC exams on behalf of others. After further questioning, Garcia said he saw Alfonso in one of the parking garages at MIA and gave him \$250 in cash for Alfonso's assistance in obtaining a CC license. Garcia no longer works for Oracle, due to his licensing issues.

Jose Tirado

OIG Investigators interviewed Tirado on 10/7/21. The sworn statement was audio recorded. Tirado advised he had been employed by Deya Elevator for approximately thirteen (13) years in Puerto Rico. Tirado was recruited by Oracle in Puerto Rico and hired in January 2019, to work at MIA. Tirado did not attend or receive any training; however, he was required to get a CC license. Tirado took the CC exam at least two times and each time failed to pass the exam. Tirado said the exam is in English and he does not have good command of the English language, consequently, he did not pass the exam. Tirado said Oracle management required that he have a CC license. Alfonso offered his assistance and stated that for a fee of \$300, he would help him pass the exam. Tirado paid Alfonso via Zelle after receiving confirmation that the CC exam was successfully completed. According to Tirado, Oracle suspended him on 10/4/21, after allegations of fraudulent licensing surfaced.

Gabriel Ortiz

OIG Investigators interviewed Ortiz on 10/7/21. The sworn statement was audio recorded. Ortiz started working at Deya Elevator Service in Puerto Rico, in 2017. While there, he learned to work on escalators and moving walkways. Ortiz advised in Puerto Rico there were no certification exams you had to pass. Ortiz knew Oracle was recruiting elevator mechanics in Puerto Rico. Ortiz was hired by Oracle in October 2019. According to Ortiz, Oracle required him to get a CC license, and in mid-2020, Oracle management held a meeting at their airport office and took a count of the elevator mechanics that were not certified. Ortiz advised Alfonso approached him and offered to take care of him and help him out by getting someone to take the CC exam for him. Gabriel Alfonso provided him with instructions to go to the Elevator World website, establish an online account and password. Ortiz gave Gabriel Alfonso all that information, and Alfonso took care of the rest.

Hugo Marte

OIG Investigators interviewed Marte on 10/14/21. The sworn statement was audio recorded. On this date, Marte was on suspension from Schindler Elevator Corporation (Schindler) due to licensing issues. Marte worked for Schindler since approximately February 2017, and never worked at MIA. Marte stated he took the state CC exam and failed it. Marte stated his friend, Valles, whom he knew from prior employment at another elevator company, referred him to Gabriel (LNU) as someone who could help him. Gabriel told Marte he could take the exam for him for \$400. Gabriel instructed Marte to register for the exam and send him Marte's log-in credentials. Marte's credentials were still good from his failed first exam, so he only had to pay for the new exam, not create a new user identity. Gabriel sent him a picture of the exam certificate. Marte stated he only applied for a CC license, not a CET certification. He admitted uploading the fraudulent elevator world certificate of completion with his application. At the end of September 2021, he was summoned to a Schindler supervisor's office and questioned about his license status. Marte stated he was not totally honest during that statement. Since his suspension, Marte self-reported to DBPR that he obtained his CC/CET license fraudulently. Enforcement action was taken, and he has since retaken the exam and obtained a new CC/CET license.

Frederick Williams

OIG Investigators interviewed Williams on 10/14/2021. The sworn statement was audio recorded. Williams worked for Schindler from approximately 2017 to 10/1/2021. His employment ended due to fraudulent licensing issues. According to Mr. Williams, his co-worker Marte told him about Gabriel (LNU) who could take the exam for him. Williams called Gabriel and texted with him. Williams registered for the online exam and sent Gabriel his username and password. He later was furnished a Certificate of Completion of the online exam from Elevator World. He paid Gabriel \$400 via Zelle. Williams stated he never took the exam himself. Williams admitted he submitted the fraudulent Certificate of Completion to DBPR along with his application. No one at Schindler ever pressured him to get his CC/CET, and no one assisted him with the DBPR application process. Williams stated that he later learned Marte got Gabriel's information from David (LNU), who was recently fired from his supervisor position with Schindler. Your affiant notes that Mr. Williams self-reported to DBPR that he obtained his CC/CET license fraudulently. Enforcement action was taken.

Ramon Fleitas

OIG Investigators interviewed Fleitas on 10/7/22 at his residence. The sworn statement was audio recorded. Fleitas stated he worked for Oracle from approximately 1.5 – 2 years and was never assigned to MIA. He admitted to doing some Oracle repair work at Port Miami. Fleitas stated that the state exam was very easy, and he prepared for it with materials provided by Valles. He believes he applied for a CC license in February of 2021. Fleitas claimed to have taken the exam on the Elevator World website himself, and claimed no other person took the exam for him. He claimed to have used his own computer inside his Sunny Isles apartment. Fleitas stated his English is good, and he had no problem with the exam. Fleitas identified his Elevator World Certificate of Completion dated 2/15/21. Fleitas identified his bank records when shown by OIG agents. When questioned about the 2/16/21, \$400 Zelle payment to Valles, Fleitas explained this payment by claiming that he owed Valles money, but did not explain why.

Fleitas asked to go off-record, asked about cooperating and asked what would happen to him. He was very concerned about maintaining his CC license and his job. Agents stated that the recorder could not be turned off and could make no promises.

FRAUDULENT LICENSING AND EMPLOYEE THEFT OF SALARY FROM ORACLE AND ORACLE'S OVERBILLING MIAMI-DADE COUNTY

Because at least four of these Oracle employees were working at MIA, your affiant notes that upon licensing, the classification of how Oracle billed the County for these employees changed. Instead of being billed as helpers, they were billed as licensed mechanics. An OIG Auditor and licensed State of Florida CPA, Cristin Revilla, reviewed the Oracle requests for payment submitted to and paid by Miami-Dade County Aviation Department (MDAD), pursuant to the elevator maintenance and repair contract between Oracle and MDAD. The invoices are from approximately January 31, 2020 through October 31, 2020, which covered service dates from 10/31/2019 through 10/28/2020. This review was done to

determine if there were overpayments caused by the fraudulent licensing. This review relates to employees: Alfonso, Tirado, Cuevas, and Ortiz.

According to the MDAD/Oracle contract, MDAD pays Oracle for salary expense for employees performing maintenance and repair services at MIA. The contract details the amount of compensation for the various classes of workers. An unlicensed "Helper", who requires supervision is paid less than a Certified Elevator Technician, licensed by the State of Florida.

During this timeframe, MDAD paid Oracle a total of **\$24,030.00** for the fraudulently licensed employees. These employees were paid as if fully licensed mechanics when they were not. The difference between what they were actually paid and what they should have been paid as an unlicensed helper for this timeframe was **\$2,937.00**. Had MDAD known that the employees were fraudulently licensed, MDAD would not have paid these amounts.

Your affiant notes that the time frame reviewed is only a portion of the time the mechanics may have worked at MDAD while fraudulently licensed. Therefore, the numbers detailed herein may increase. Further, your affiant notes that the above amounts reflect merely the amounts incorrectly billed by Oracle, based upon contract provisions and fraudulent licensing. The exact amount paid to the employees by Oracle may be different based upon each employee's salary agreement with Oracle and other work performed by the employee for other Oracle customers.

CRIMINAL VIOLATIONS

Based upon the foregoing, it is submitted by your Affiant that there exists probable cause to believe that the defendants detailed in the below chart, cheated on the State of Florida Elevator Safety Certificate of Competency Exam, and also engaged in a systematic ongoing course of conduct to defraud Elevator World, Inc., the State of Florida, Miami-Dade County, Oracle Elevator, Inc., and Schindler Elevator Corporation. Therefore, they did knowingly commit the following crimes:

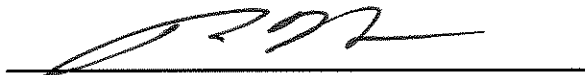
DEFENDANTS	STATUTE	CRIME	DEGREE FELONY
All 10 Defendants	817.034	Organized Scheme to Defraud - under \$20K	THIRD DEGREE FELONY
GABRIEL ALFONSO PERSON UNKNOWN #1	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO XAEI CONCEPCION	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO JOSE CUEVAS	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES RAMON FLEITAS	817.29	Cheating	THIRD DEGREE FELONY

DAVID VALLES GABRIEL ALFONSO MARCOS GARCIA	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO HUGO MARTE	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO GABRIEL ORTIZ	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO JOSE TIRADO	817.29	Cheating	THIRD DEGREE FELONY
DAVID VALLES GABRIEL ALFONSO FREDERICK WILLIAMS	817.29	Cheating	THIRD DEGREE FELONY

FURTHER, AFFIANT SAYETH NOT


OIG Special Agent Javier R. Montero
Affiant

Sworn to and subscribed before me on this the 2 day of NOVEMBER, 2022, by Affiant Javier R. Montero



Circuit Court Judge
Eleventh Judicial Circuit
Miami-Dade County, Florida