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PREPARATION OF WELFARE FRAUD CASES

CALIFORNIA WELFARE FRAUD INVESTIGATORS ASSOCIATION



W&I 10980

- ▶ (c) Whenever any person has, willfully and knowingly, with the intent to deceive, by means of false statement or representation, or by failing to disclose a material fact, or by impersonation or other fraudulent device, obtained or retained aid under the provisions of this division for himself or herself or for a child not in fact entitled thereto, the person obtaining the aid shall be punished
 - ▶ (1) \$950 or less as misd
 - ▶ (2) over \$950 as felony/ wobbler
- ▶ PC118 – any person who ...declares...under penalty of perjury and willfully states as true any material matter which he or she knows to be false is guilty of perjury. Felony



TYPES OF CASES:

*UNREPORTED INCOME (W&I 10980 C)

*ABSENT PARENT/ CHILD

RESIDENCY

CHILD CARE/ WELFARE TO WORK

FOOD STAMP FRAUD (W&I 10980 F & G)

COUNTERFEIT EBT CARDS (W&I 10980 D & E)

EMPLOYEE THEFT

IN HOME SUPPORT SERVICES



OTHER ASSOCIATED CRIMES

- ▶ PC118 – PERJURY
- ▶ PC 530.5 – IDENTITY THEFT
- ▶ PC 470 – FORGERY
- ▶ PC 72 – PRESENTING A FALSE CLAIM (IHSS)
- ▶ PC 424 – EMBEZZLEMENT BY AN EMPLOYEE
- ▶ PC 550 – UNLAWFUL CLAIMS (IHSS)



ELEMENTS THAT THE DA NEEDS TO PROVE

- ▶ DEF MADE A FALSE STATEMENT
- ▶ FALSE STATEMENT WAS A MATERIAL FACT
- ▶ STATEMENT WAS MADE WITH A SPECIFIC INTENT TO DEFRAUD
- ▶ KNEW FALSE
- ▶ AMOUNT OF THE LOSS
- ▶ OBTAINED BY SOMEONE NOT ENTITLED TO THE AID



FALSE STATEMENT/ MATERIAL


- ▶ WHAT THE DEF LIED ABOUT
- ▶ INCOME, AP IN HOME, CHILD OUT ETC
- ▶ IS IT MATERIAL

- ▶ COMES FROM THE FORMS
- ▶ COUNTY WELFARE SYSTEM NOTES
- ▶ WHAT DEF SAID
- ▶ HAS TO BE SOMETHING WEL. RELIES ON TO DETERMINE ELIGIBILITY



SPECIFIC INTENT/ KNEW FALSE

- DEF INTENDED TO DEFRAUD WEL. DEPT
- SIGNED UNDER PENALTY OF PERJURY (P OF P)
- SPECIFICALLY ASKED BY EW AND LIED
- DEF HAS PAST OI/ OP ACCTS
- -PULL THE NOA, JOURNALS AND REPORTS BY INVESTIGATOR

- 
- ▶ DEF ADMISSION KNEW CONDUCT WRONG, EX. “NEEDED THE MONEY”
 - ▶ QUOTES FROM DEF IN SYSTEM/ TO EW
 - ▶ PULL THE FORM AND JOURNAL BEFORE FRAUD AND AFTER FRAUD
 - ▶ DEF HAS PRIORS FOR WELFARE FRAUD
 - ▶ -RUN RAP AND INTERSTATE RAPS
 - ▶ -GET THE POLICE REPORTS FOR THE PRIORS



PROVING FALSE STATEMENT & INTENT

- ▶ NEED TO LOOK AT THE FORMS FILLED OUT BY DEFENDANT
- ▶ SAWS-2, SAWS 2 PLUS, SAR-7, QR-7

- ▶ WHO DOES THE DEF LIST AS LIVING IN THE HOME
- ▶ WHO DID THE DEF LIST AS WORKING OR NOT WORKING
- ▶ HOW MUCH DID THE DEF PUT AS THE INCOME
- ▶ WHEN IT STARTED AND ENDED
- ▶ WHO PURCHASES AND PREPARES TOGETHER OR SEPARATE



FORMS

- ▶ DOCUMENTS ARE COMPLETED AT THE APPLICATION WITH EW
- ▶ INFORMATION ON THE FORMS COMES FROM DEF
- ▶ LOTS OF NON-RELEVANT INFO, BUT LOOK AT KEY QUESTIONS
- ▶ -Who's in the home
- ▶ -yes or no to working or training
- ▶ -earned income
- ▶ -self employment income
- ▶ -lost or quit jobs
- ▶ PULL JOURNALS THAT COINCIDE WITH THE FORMS FOR MORE DETAILS



FORMS



- ▶ COMPARING THE FORMS INFO IN THE SYSTEM MAY CLEAR UP WHAT SEEMS LIKE REPORTING OF INCOME
- ▶ -EX. Forms says “yes” to #8 income or job but in journal it notes def said lost the job or laid off, etc.
- ▶ -Journal is also important to read before interviewing the def, spouse, boy/girlfriend or children to compare for inconsistencies



AMOUNT OF LOSS

- ▶ QRS ESTABLISHES THE AMOUNT
- ▶ VERIFY STATUTE OF LIMITATIONS
- ▶ -4 YRS FROM DISCOVERY
- ▶ -DISCOVERY EDD REPORT OR BUDGETTED
- ▶ QRS IN SB CO. DO A NARRATIVE TO EXPLAIN AMOUNT, FRAUD PERIOD AND WHY IT'S FRAUD
- ▶ -VERY HELPFUL ESPECIALLY WHEN TIME FRAME HAS GAPS



UNDER PENALTY OF PERJURY

- ▶ ALL FORMS ARE SIGNED UNDER P OF P
- ▶ EW NOTES IN JOURNAL TOLD DEF UNDER P OF P
- ▶ ON LINE APPS (E-APP) – SPECIAL PROBLEM
- ▶ -MORE COMMON DURING PANDEMIC
- ▶ -ARE UNDER P OF P
- ▶ -DURING ONLINE PROCESS SCREEN POPS UP WITH THE P OF P ADVISEMENT
- ▶ -PRINTED/ IMAGED COPY DOESN'T HAVE SIG. PAGE
- ▶ GET DEF'S ADMISSION ACKNOWLEDGED THE P OF P SCREEN



UNREPORTED INCOME

- ▶ Defendant fails to report
- ▶ their own income
- ▶ income of a child's parent living in the home
- ▶ income of an adult child living in the home
- ▶ income of their parent who they live with



FRADIUE/ TURNER

- ▶ CASE PENDING
- ▶ AND NEW ONE SUBMITTED WHILE FIRST STILL PENDING
- ▶ TIME FRAMES OVERLAPPED




WHO TO INTERVIEW


- ▶ EW/ QRS
- ▶ WTW AND CHILD CARE EW
- ▶ EMPLOYER, SUPERVISOR
- ▶ CUSTODIAN OF RECORDS
- ▶ OTHERS IN THE HOME WITH DEF
- ▶ DEFENDANT



FINDING THE INCOME

- ▶ INITIALLY PULLED FROM THE EDD REPORT
- ▶ QRS PULLS FROM “WORK NUMBER” OR SIMILAR SYSTEM
- ▶ QRS MAY ALSO GET DIRECTLY FROM THE EMPLOYER
- ▶ CAN GET ADMISSIBLE COPY FOR COURT FROM EITHER SEARCH WARRANT OF SDT
- ▶ TALK TO THE CUSTODIAN OF RECORDS AT BUSINESS
- ▶ -SHOW THEM WHAT QRS PULLED AND GET THEM TO VERIFY IT IS CORRECT PAYROLL FOR DEF/ OTHER

- 
- ▶ TAKE DMV PICTURE WITH YOU TO HAVE EMPLOYER VERIFY DEF OR OTHER AS EMPLOYEE AND TIME FRAME WORKED
 - ▶ -needed for when we cannot locate the def or other OR they deny
 - ▶ GET THEIR CONTACT INFORMATION
 - ▶ -PERSONAL INFO TOO NOT JUST BUSINESS ADDRESS
 - ▶ -DOB
 - ▶ PERSONAL CELL NUMBERS
 - ▶ GET COPY OF THE EMPLOYMENT FILE – FOR ADDRESS USED, EMERGENCY CONTACT, DOB & SSN, AND ID CARD PICTURE

- 
- ▶ IF INCOME FROM IHSS – MAKE SURE THEY DON'T BLACK OUT THE NAME AND IDENTIFYING INFO OF THE PAYEE AND PAYOR, EX. DOB,SSN,NAME
 - ▶ IF RETIREMENT/PENSION/SOCIAL SECURITY INCOME MAY NEED WAIVER FROM THE PAYEE IF OTHER THAN DEF
 - ▶ IF INCOME FROM A BUSINESS DEF OWNS, NEED TAX RECORDS.
 - ▶ -DO SW AND SEARCH THE HOME FOR TAX RECORDS
 - ▶ -MOST PEOPLE KEEP COPIES
 - ▶ -TAKE THE COMPUTER, FOR SAVED TURBO TAX FORMS
 - ▶ -EASIER THAN TRYING TO GET THEM FROM IRS OR FRANCHISE TAX BD
 - ▶ RUN THEM AGAIN IN INCOME SYSTEM TO SEE IF STILL DOING IT



ABSENT PARENT (AP) CASE

- NEED TO PROVE AP IN THE HOME AND TIME FRAMES
- -WHO DOES DEF LIST IN HOME
- -DID DEF REPORT AP OUT OF THE HOME
- LOOK TO PRIOR APPS
- -HAS DEF REPORTED AP OR KID OUT PREVIOUSLY?
- -SHOWS KNOWS SUPPOSED TO
- GET THE CHILD SUPPORT QUESTIONNAIRE
- -Signed under penalty of perjury to show claimed AP out of home
- -ANOTHER PC118 COUNT



TALK TO

- ▶ ABSENT PARENT
- ▶ CHILDREN
- ▶ RELATIVES
- ▶ NEIGHBORS
- ▶ EMPLOYERS
- ▶ LANDLORD



CORROBORATION

- ▶ CHECK FACEBOOK FOR PICTURES TOGETHER AND DATES
- ▶ -PRINT THEM OUT WHEN FOUND SO NOT DELETED
- ▶ CHECK MARRIGE LICENSES, CA AND NV
- ▶ RUN DMV TO SEE ADDRESS LISTED BY AP
- ▶ RUN VEHICLE REGISTRATIONS FOR CARS AND ADDRESSES
- ▶ -SURVEIL THE HOUSE, DO YOU SEE THE CARS



MORE

- ▶ TALK TO THE NEIGHBORS, FRIENDS, RELATIVES
- ▶ -DO THEY SEE AP AT ALL HOURS, ETC
- ▶ TALK TO LANDLORD
- ▶ -WHO IS ON LEASE, WHO PAYS THE RENT, WHO DO THEY GET CALL FOR REPAIRS FROM
- ▶ WHAT ADDRESS DOES THE AP USE FOR WORK, CDL
- ▶ -EMPLOYMENT FILE
- ▶ RUN RAP OF AP, WHAT ADDRESS USED FOR PROBATION OR PAROLE
- ▶ ARE THERE SUPPORT ORDERS FOR CHILD SUPPORT, CUSTODY
- ▶ -Absence of those things can show togetherness



CHILD OUT OF THE HOME

- ▶ LOOK TO THE FORMS AS TO WHO IS LISTED ON THE CASE
- ▶ CHECK THE SAR TO SEE IF CHILD REPORTED OUT - QUES #1
- ▶ CHECK SAR FOR CHANGES TO CUSTODY - QUES #13
- ▶ GET THE CHILD SUPPORT QUESTIONNAIRE
- ▶ SCHOOL RECORDS
- ▶ -WHO IS LISTED AS EMERGENCY CONTACT AND CUSTODIAL PARENT
- ▶ TALK TO THE SCHOOL TEACHER, OFFICE SECRETARY, NURSE
- ▶ -WHO SHOWS UP TO PICK UP CHILD
- ▶ -WHO COMES TO PARENT CONFERENCES/ FIELD TRIPS



CHILD OUT

- ▶ TALK TO CUSTODIAL PARENT
- ▶ TALK TO GRAND PARENTS, NEIGHBORS
- ▶ TAKE PICTURES OF CHILD'S ROOM/ PICTURES ON FRIDGE/ TOYS ETC.
- ▶ -and lack there of those things at def's
- ▶ CUSTODY AND SUPPORT RECORDS
- ▶ -copy from custodian parent
- ▶ -certified from Family court
- ▶ GO BACK IN DEF HISTORY OF APPS
- ▶ -HAS SHE REPORTED CHILD OUT BEFORE OR OTHER KIDS
- ▶ -SHOWS KNOWLEDGE



EXAMPLES



- CHANGE IN CUSTODY
- DEF HAD CUSTODY WHILE MOM IN SCHOOL
- SHE GETS THE CHILD AND DEF CON'T TO CLAIM AID FOR HIM
- NEVER REPORTED CHANGE IN CUSTODY
- MULTIPLE JURIS.- SB AND RIV
- MULTIPLE TYPES OF FRAUD
- DEF APPLIES FOR AID FOR SON WHO LIVES WITH BIO DAD
- SHE IS GETTING INCOME
- HER ADULT WORKING DAUG IN HOME AND FTR INCOME
- DAUG ON HER OWN AID CASE IN SAME HOME, NOT REPORTING MOM



NON WELFARE DOCUMENTS

- ▶ COPIES OF TAX FORMS, PAY STUBS, BANK STATEMENTS FROM DEF OR AP
- ▶ SCHOOL RECORDS
- ▶ CUSTODY / FAMILY COURT ORDERS
- ▶ LEASE AGREEMENTS
- ▶ SECTION 8 LEASES
- ▶ BIRTH CERTIFICATES/ MARRIAGE LICENSES – CERTIFIED
- ▶ -COMPARE TO ANY IMAGED IN SYSTEM
- ▶ JAIL CALLS



INTERVIEW PREPARATION

- ▶ ALWAYS REVIEW ALL THE SAWS/ SAR FORMS AND INCOME BEFORE THE INTERVIEW
- ▶ -CATCH DEF/ SPOUSE IN LIES
- ▶ REVIEW THE JOURNALS TO CONFRONT THEM WITH PRIOR STATEMENTS TO EW/ QRS
- ▶ GATHER ALL OTHER NON WELFARE DOCUMENTS BEFORE THE INTERVIEW TO REVIEW

A dark blue arrow points to the right at the top left. Below it, several thin, curved lines in shades of blue and grey sweep across the left side of the slide.

INTERVIEWING THE DEFENDANT

- ▶ BE SURE TO IDENTIFY THEM
- ▶ -PULL THEIR CDL
- ▶ GIVE THEM THE BEHELER WAIVER
- ▶ ALWAYS GET THEM TO VERIFY THE FORMS AND THEIR SIGNATURES
- ▶ ALWAYS GET THEM TO VERIFY THEIR EMPLOYERS, WHEN THEY WORKED, QUIT ETC
- ▶ IS THE INCOME PROVIDED BY EMPLOYER CORRECT
- ▶ ASK THEM FOR THEIR PAY STUBS, BANK INFO – JT ACCTS, DIRECT DEPOSIT
- ▶ GET THEM TO ADMIT THEY KNEW NEEDED TO REPORT INCOME, KIDS ETC



DEFENDANT

- ▶ GET THEM TO ADMIT THEY TALKED TO EW OR QRS
- ▶ THAT EW ASKED THEM ABOUT EMPLOYMENT
- ▶ PIN DOWN WHO LIVED IN HOME, WHEN
- ▶ VERIFY INFO FROM JOURNAL EW PUT DOWN DEF TOLD THEM
- ▶ TIE THEM TO THEIR STORY WITH AS MANY DETAILS AS POSSIBLE
- ▶ GET CONSENT TO SEARCH DEF AND CHILD'S ROOM
- ▶ -clothes in closet - look at sizes
- ▶ Toys, homework, pics on fridge, beds
- ▶ TAKE PICTURES!!



DEFENDANT

- ▶ PULL CDL, ALL FORMS
- ▶ -ID ALL SIGNATURES
- ▶ -SIGNATURES MAY CHANGE OVER TIME
- ▶ RECORD THEIR STATEMENT



WITNESS INTERVIEWS

THE INTERVIEW IS IN THE DETAILS!!

- ▶ HOW THEY KNOW DEF, HOW LONG KNOW DEF
- ▶ SHOW THEM CDL OF DEF OR AP TO BE SURE TALKING ABOUT RIGHT PERSON
- ▶ GET PERSONAL CONTACT INFO, i.e. DOB
- ▶ IF THEY POINT YOU TO OTHER WITS, GET INFO
- ▶ NEIGHBORS – HOW LONG LIVED THERE, KNOWN DEF, HOW OFTEN SEE AP OR DEF OR KIDS
- ▶ RECORD THE INTERVIEWS
- ▶ DETAILS! DETAILS! PIN THEM DOWN ON A STORY EARLY

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WHY WAS MY CASE REJECTED??

- ▶ STATUTE OF LIMITATIONS
 - ▶ -IEVS requirement to notify def in 45 days (W&I 10980 (j))
 - ▶ -date of discovery
- ▶ YOUR REPORT WAS CONFUSING
 - ▶ -an overall summary of the fraud helps
- ▶ MISSING DOCUMENTS OR INTERVIEWS
 - ▶ -no employer id of def or AP as employee
 - ▶ -no journals to match forms



REJECTED??

- ▶ LACK OF PROOF OF INTENT
- ▶ -LOSS OF EMPLOY BETWEEN PERIODS AND THEN REPORT ON NEXT FORM
- ▶ -INCONSISTENCY BETWEEN FORMS AND JOURNALS
- ▶ -GAPS IN FRAUD PERIOD

- ▶ CASE TOO CIRCUMSTANTIAL
- ▶ -NOT ENOUGH PROOF OF WHEN AP IN OR OUT OF HOME

- ▶ DIDN'T INCLUDE ALL FRAUD IN SINGLE REPORT



DA FILING

- ▶ PUT RECORDS IN CHRONOLOGICAL ORDER
- ▶ ISSUE ARRAIGNMENT LETTERS RATHER THAN WARRANTS
- ▶ DO THE SDT FOR DOCUMENTS AT FILING FOR ARRAIGNMENT DATE
- ▶ DON'T FORGET THE PERJURY AND FORGERY
- ▶ THINK ABOUT IDENTITY THEFT
- ▶ ADD AMOUNT OF THE FRAUD TO COMPLAINT
- ▶ ADD STRIKES UPFRONT
- ▶ IF FOOD STAMPS FRAUD DON'T FORGET THE 10980(h)
- ▶ -additional time for amount of loss



INVESTIGATOR PREP FOR A PRELIM/ TRIAL

BE PREPARED!!

- ▶ READ AND READ OVER YOUR REPORT
- ▶ BE FAMILIAR WITH ALL INTERVIEWS
- ▶ “I don’t recall” needs to be kept to a minimum
- ▶ IF INTERVIEW HAS GAPS REINTERVIEW WITS (AN DO SUPP)
- ▶ GO OVER EW INTERVIEW PROCESS IN DETAIL
- ▶ DO THEY INFORM DEF SIGNING UNDER P OF P
- ▶ GO OVER THEIR JOURNAL WITH THEM, TO EXPLAIN IT
- ▶ HAVE COPIES OF ANY DOCUMENTS YOU USED DURING THE INTERVIEWS



AREAS YOU WILL BE QUESTIONED ABOUT

- ▶ LAW ENFORCEMENT EXPER. FOR PROP 115
- ▶ JOB DUTIES – STRONG ON INVESTIGATION – PC 872
- ▶ BE FAMILIAR WITH HOW THE DEPT WORKS IN ALL ASPECTS
- ▶ HOW ARE DOCUMENTS COLLECTED AND AUTHENTICATED
- ▶ EX. C-IV & WORK NUMBER
- ▶ IDENTIFY THE DEF
- ▶ YOUR INTERVIEW WITH THE WITS
- ▶ IDENTIFY DOCUMENTS
- ▶ DEF INTERVIEW



DA PREP

- ▶ DO AN EXHIBIT LIST FOR YOUR JA
- ▶ MARK EXHIBITS AHEAD OF TIME IN CHRONOLOGICAL ORDER
- ▶ CLEAN COPY OF FORMS
- ▶ SIGNATURE PAGES
- ▶ CALCULATION OF FRAUD AMOUNT
- ▶ SDT OF PAYROLL OR SCHOOL RECORDS
- ▶ CERTIFIED CDL, VEH REGS, RAPS
- ▶ TALK TO WITNESSES AHEAD OF TIME
- ▶ DO YOU WANT TO PROP 115 EW/ QRS/ CIVILIAN WITS?



CHILD CARE/ WTW

- ▶ THESE CASES ARE WHERE THE DEF CLAIMS TO BE WORKING VIA WTW AND WE PAY CHILD CARE DURING WORK HOURS
- ▶ DOCUMENTS:
- ▶ CHILD CARE FORMS
- ▶ -LISTS THAT DEF IS COMPLYING WITH THE SIGNED AGREEMENT WITH CC
- ▶ -TALK TO THE CC EW FOR HER SIGNED CONTRACT
- ▶ -SIGNED UNDER PENALTY OF PERJURY
- ▶ TALK TO THE EMPLOYER LISTED
- ▶ GET THE EMPLOYMENT RECORDS
- ▶ -LIKELY SHOW SHE QUIT OR WAS FIRED



CASE EXAMPLES

CHESTER

- ▶ DEF HAS BEEN ON AID A WHILE AND HAS TIMED OUT FOR HERSELF.
- ▶ SHE STILL CLAIMS CF & CW FOR THE KIDS
- ▶ SHE GETS JOB & FTR IT TO WEL.
- ▶ APPLYS FOR C.C THRU SCHL DIST AND SHOWS THEM PAYSTUBS

- ▶ DOUBLE DIPPING

BLANTHORNE

- ▶ DEF FORGES HER PAYSTUB FOR EMPLOYER SHE QUIT
- ▶ CLAIMS CARETAKER FOR DISABLED HUSB – HE SAYS NO
- ▶ SIGNS WTW/CC FORMS UNDER P OF P

- ▶ DON'T FORGERT FORGERY CHARGES



RESIDENCY

- FROM COUNTY TO COUNTY
- -NOT REALLY A PROBLEM AS IF ALL ELSE CORRECT AND DEF ENTITLED ISSUE IS ONLY WHO PAID

- OUT OF STATE
- RUN EBT HISTORY FOR TRANSACTIONS LOCATION
- RUN DEF THRU OUT OF STATE DMV
- INTERVIEW FAMILY
- PULL SCHOOL RECORDS TO SEE IF FILE TRANSFERRED TO NEW SCHOOL OR CHILD NO RE-ENROLLED



FOOD STAMP FRAUD

- ▶ APPLY TO STORES THAT ACCEPT FOOD STAMPS
- ▶ -USUALLY INVESTIGATED BY DEPT OF AG
- ▶ -COME TO US WHEN THE AG DECLINES CASE FOR TOO LOW AMOUNT OF LOSS
- ▶ INTERNAL AUDIT FINDS EW STEALING
- ▶ INTERVIEWS WITH DEF IDENTIFIED BY DEPT OF AG INVESIG OF STORES



LAW

- ▶ (d) any person who knowingly uses, transfers, acquires, or possesses blank authorizations to participate in the federal Supplemental Nutrition Assistance Program (SNAP) in any manner not authorized..., with the intent to defraud is guilty of a felony.
- ▶ (e) any person who counterfeits or alters or knowingly uses, transfers, acquires, or possesses counterfeited or altered authorizations to participate in the federal SNAP or to receive CalFresh benefits or electronically transferred benefits in any manner not authorized... is guilty of forgery.
- ▶ (f) any person who fraudulently appropriates CalFresh benefits, electronically transferred benefits, or authorizations to participate in SNAP with which he or she has been entrusted as a public employee is guilty of embezzlement.



LAW

- ▶ (g) any person who knowingly uses, transfers, sell, purchases, or possesses CalFresh benefits, electronically transferred benefits, or authorization to participate in SNAP is guilty
- ▶ (1) Of misd if \$950 of less
- ▶ (2) of felony if over \$950 county prison

- ▶ (h) if the violation of (f) or (g) is by electronic transfer additional penalty
- ▶ A over \$50,000 add 1 year
- ▶ B over \$150,000 add 2 yrs
- ▶ C over \$1 million add 3 yrs
- ▶ D over \$2.5 million add 4 yrs state prison



EXAMPLES



STORE FRAUD

- ▶ DEPT OF AG IDENTIFIES STORES SHOWING RED FLAGS
- ▶ RUNS COMPS
- ▶ SENDS IN UC CI'S TO MAKE MULTI
- ▶ TRANSACTIONS

DEF ID'D BY DEPT OF AG

- ▶ DEPT OF AG IDENTIFIES STORE
- ▶ WE RUN THE EBT OF STORE FOR OUR CLIENTS USING STORE
- ▶ INTERVIEW DEF TO ADMIT SELLING CF AND ID STORE OWNER



EMPLOYEE THEFT

- EW CREATES FRAUDULENT AID ACCOUNTS
- OBTAINS THE EBT CARD AND USES FUNDS

- EW CREATES FAKE CHILD CARE ACCOUNTS
- LISTS HER FAMILY AS THE CARE GIVERS
- PAYS THEM FROM FAKE CLIENTS



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