STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL

RANDALL J. MEYER, INSPECTOR GENERAL

REPORT OF INVESTIGATION

AGENCY: OHIO DEPARTMENT OF JOB & FAMILY SERVICES
FILE ID NO.: 2022-CA00023
DATE OF REPORT: SEPTEMBER 10, 2025

The Office of the Ohio Inspector General ...
The State Watchdog

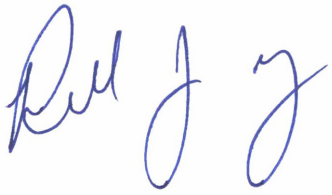
"Safeguarding integrity in state government"

The Office of the Ohio Inspector General is authorized by state law to investigate alleged wrongful acts or omissions committed by state officers or state employees involved in the management and operation of state agencies. We at the Inspector General's Office recognize that the majority of state employees and public officials are hardworking, honest, and trustworthy individuals. However, we also believe that the responsibilities of this Office are critical in ensuring that state government and those doing or seeking to do business with the State of Ohio act with the highest of standards. It is the commitment of the Inspector General's Office to fulfill its mission of safeguarding integrity in state government. We strive to restore trust in government by conducting impartial investigations in matters referred for investigation and offering objective conclusions based upon those investigations.

Statutory authority for conducting such investigations is defined in *Ohio Revised Code §121.41* through *121.50*. A *Report of Investigation* is issued based on the findings of the Office, and copies are delivered to the Governor of Ohio and the director of the agency subject to the investigation. At the discretion of the Inspector General, copies of the report may also be forwarded to law enforcement agencies or other state agencies responsible for investigating, auditing, reviewing, or evaluating the management and operation of state agencies. The *Report of Investigation* by the Ohio Inspector General is a public record under *Ohio Revised Code §149.43* and related sections of *Chapter 149*. It is available to the public for a fee that does not exceed the cost of reproducing and delivering the report.

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The Inspector General's Office remains dedicated to the principle that no public servant, regardless of rank or position, is above the law, and the strength of our government is built on the solid character of the individuals who hold the public trust.



Randall J. Meyer
Ohio Inspector General

STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL
RANDALL J. MEYER, INSPECTOR GENERAL

REPORT OF INVESTIGATION

FILE ID NUMBER: 2022-CA00023

SUBJECT NAME/POSITION: Francesca Figueroa-Rivera
Intermittent Customer Service Representative

AGENCY: Ohio Department of Job and Family Services

BASIS FOR INVESTIGATION: Referral

ALLEGATIONS: Criminal Conduct

INITIATED: September 2, 2022

DATE OF REPORT: September 10, 2025

INITIAL ALLEGATION AND COMPLAINT SUMMARY

On September 2, 2022, the Office of the Ohio Inspector General received a referral from the Ohio Department of Job and Family Services (ODJFS) Chief Inspectors Office reporting that between February 2021 and January 2022, Intermittent Customer Service Representative (CSR) Francesca Figueroa-Rivera manipulated Pandemic Unemployment Assistance (PUA) claims, releasing approximately $1.4 million in previously denied PUA benefits to ineligible claimants.

PANDEMIC UNEMPLOYMENT ASSISTANCE (PUA) INVESTIGATIVE GROUP

In 2020, because of the COVID-19 pandemic and the increased unemployment of millions of Americans, Congress passed various programs to address the crisis, including the Pandemic Unemployment Assistance (PUA) program. The PUA program expanded and loosened eligibility requirements for unemployment recipients. Consequently, the Ohio Department of Job and Family Services (ODJFS), the agency responsible for distributing PUA benefits in Ohio, received an unprecedented number of unemployment compensation claims. This increase in claims necessitated ODJFS to hire intermittent and temporary contracted workers to process the claims. In fiscal year 2021, ODJFS disbursed approximately $7.6 billion in pandemic unemployment benefits and later, ODJFS identified millions of dollars of the disbursals as fraudulent. To address the rampant fraud connected to the PUA program, an investigative group was established that consisted of the Office of the Ohio Inspector General; Ohio State Highway Patrol; U.S. Department of Labor – Office of Inspector General; and the Ohio Department of Job and Family Services.

BACKGROUND

The Ohio Department of Job and Family Services

The Ohio Department of Job and Family Services (ODJFS) improves the well-being of Ohio's workforce and families by promoting economic self-sufficiency and ensuring the safety of Ohio's most vulnerable citizens. The department administers programs that provide public assistance, protects child welfare, ensures payment of child support, assists individuals with employment and in preparing for the workforce, provides benefits to the unemployed, and supervises the administration of federal programs and funding at the local level. The direct

delivery of services is administered by ODJFS, a combination of joint and individual county departments of job and family services, and local agencies.[1]

The ODJFS Office of Unemployment Insurance Operations (ODJFS OUIO) is responsible for administering the State of Ohio's Unemployment Insurance Program for workers and businesses. The ODJFS Benefit Payment Control (ODJFS BPC) section is part of ODJFS OUIO and is responsible for promoting and maintaining, "… the integrity of the Unemployment Insurance Program through the prevention, early detection, investigation, enforcement and recovery of improper unemployment insurance benefits."[2]

Pandemic Unemployment Assistance Program (PUA)

The Coronavirus Aid, Relief and Economic Security (CARES) Act[3] was a $2.2 trillion economic stimulus bill passed by the 116th U.S. Congress and was signed into law on March 27, 2020. The CARES Act included provisions for the Pandemic Unemployment Assistance (PUA) Program. The PUA program provided temporary benefits and support to self-employed individuals, independent contractors, and others who did not qualify for traditional unemployment benefits and had lost work due to COVID-19 related reasons. Additionally, the PUA program provided temporary benefits and support to workers whose earnings averaged less than $280 per week in their former jobs and permitted qualified applicants to receive these benefits for up to 39 weeks. The CARES Act stipulated that the distribution of PUA benefits to individuals was to end on December 31, 2020. During the COVID-19 pandemic, the ODJFS Office of Unemployment Insurance Operations (ODJFS OUIO) was responsible for the distribution of PUA benefits to qualified individuals in Ohio.

During the period when PUA benefits were available for distribution, ODJFS posted on their website[4] the requirement that PUA applicants self-certify that they met a COVID-19 related

[1] Source: Biennial budget documents.
[2] Source: Benefit Payment Control | Office of Unemployment Insurance Operations | Ohio Department of Job and Family Services.
[3] The text of this legislation can be found at: Text - S.3548 - 116th Congress (2019-2020): CARES Act | Congress.gov | Library of Congress.
[4] https://jfs.ohio.gov/ouio/pdf/COVID-19-CARES-Act-Reasons.pdf

reason for their unemployment. The U.S. Department of Labor issued guidance and defined PUA eligibility to three groups of people:

- Those previously receiving traditional unemployment benefits who refused to return to work or refused an offer of work because the workplace was not in compliance with local, state, or national health and safety standards directly related to COVID-19.
- Those who provided services to an educational institution or educational service agency and were fully or partially unemployed due to COVID-19 related reasons.
- Those who were laid-off or had their work hours reduced due to COVID-19 reasons.

On December 27, 2020, the Consolidated Appropriations Act, 2021,[5] was signed into law and extended the expiration date set by the CARES Act for the payment of PUA benefits to qualified applicants from December 31, 2020, to March 14, 2021. The Act further extended the number of weeks an eligible applicant could receive these benefits from 39 weeks to 50 weeks.

Additionally, to strengthen the integrity of the PUA program, the Consolidated Appropriations Act, 2021, amended the CARES Act by:

- Requiring states to verify the identity of applicants.
- Requiring applicants to substantiate employment or self-employment, and wages earned or paid, to confirm eligibility for pandemic unemployment assistance no later than 90 days from the date of application.

On March 11, 2021, the American Rescue Plan Act of 2021[6] was signed into law and extended the payment of PUA benefits to qualified individuals from March 14, 2021, to September 6, 2021, and extended the maximum weeks an eligible applicant could receive these benefits from 50 to 70 weeks. The State of Ohio ended the PUA program on September 4, 2021.

PUA Claim Processing

The basic steps to process a PUA claim were:

[5] The text of this legislation can be found at: H.R.133 - 116th Congress (2019-2020): Consolidated Appropriations Act, 2021 | Congress.gov | Library of Congress.

[6] The text of this legislation can be found at: H.R.1319 - 117th Congress (2021-2022): American Rescue Plan Act of 2021 | Congress.gov | Library of Congress.

1. The Claimant Applied for Benefits: This was the initial step in the PUA claims process and required the claimant to: complete a claim application questionnaire; enter their personal, demographic and work history information; adjust the start date of the claim to be the last date the claimant worked/onset of COVID-19 date (i.e., called backdating); upload all their ODJFS-required documentation into the claims system; and to submit the claim.
2. ODJFS Adjudication: After the claimant submitted the claim to ODJFS, the adjudication step was the initial determination made by ODJFS on the claim based on the accuracy and comprehensiveness of the claimant's application and uploaded documents.
3. ODJFS Redetermination (if applicable): This was the process used when a claim was initially adjudicated as "Ineligible" and the claimant appealed the initial decision. When this appeal occurred, the claim was sent to either the appeals team or the redetermination team for further review.
4. Processing for Payment: Once the claimant was found to be eligible for benefits, ODJFS performed steps to release benefit payments to the claimant by either direct deposit or by "ReliaCard®," which is Ohio's unemployment-specific debit card.
5. Payment Release: The claimant received their benefit payment by direct deposit, or the funds were loaded onto their ReliaCard® for immediate use.



US Bank ReliaCard®

Ohio claimants have the option of receiving their unemployment benefits as a direct deposit into a current bank account or in the form of a debit card which is issued as a US Bank ReliaCard®; Ohio's unemployment-specific debit card. Once ODJFS determines a claim as eligible, ODJFS contacts US Bank ReliaCard® who then mails the card to the claimant. ODJFS then deposits the approved benefit amount to the card.

Claimants can make purchases with the US Bank ReliaCard® anywhere Visa® and Mastercard® debit cards are accepted, or can withdraw their funds in the form of cash from bank ATMs. The US Bank ReliaCard® does not require a personal identification number or PIN for signature-based purchases should the claimant choose credit when making the purchase. However, a PIN is needed for debit card purchases and cash withdrawals from ATMs. The four-digit PIN is created by the cardholder when activating the card.

Subject and Co-Conspirators of Investigation

Francesca Figueroa-Rivera

Francesca Figueroa-Rivera was hired as an intermittent customer service representative (CSR) by ODJFS from December 27, 2020, to January 21, 2022. She was assigned to the Office of Unemployment Insurance Operations (OUIO) where she was trained in various areas of regular/traditional unemployment[7] including PUA.

Figueroa-Rivera was approved access to the Unemployment Framework for Automated Claim & Tax Services (uFACTS) database from February 10, 2021, to February 22, 2022; however, ODJFS verified Figueroa-Rivera's last access to the database was on January 21, 2022. She was de-scheduled from working, effective Monday, January 24, 2022, due to possible fraudulent activity identified by the ODJFS internal fraud team, which warranted further investigation of her actions accessing the uFACTS database. After being de-scheduled, Figueroa-Rivera was hired by the Cuyahoga County Department of Job and Family Services (CCDJFS) and was working at CCDJFS during the period of the Office of the Ohio Inspector General's investigation.

Claudine Stavole and Richard Bencina[8]

During the investigation, Claudine Stavole and Richard Bencina were identified by investigators as co-conspirators with Figueroa-Rivera. Investigators discovered Stavole had her own PUA

[7] Regular/traditional unemployment is State of Ohio-provided unemployment assistance for claimants that lost their job due to reasons unrelated to COVID-19 and due to no fault of their own. Regular/traditional unemployment claims are contained in the Ohio Job Insurance database (OJI). OJI is a separate database from the uFACTS database which contained all PUA claims.

[8] Bencina passed away in May of 2022.

claim upon which Figueroa-Rivera released previously denied PUA benefits. Investigators also discovered Stavole acted as the intermediary, coordinating with Figueroa-Rivera on behalf of claimants, allowing claimants to bypass the identity, employment, and/or program eligibility requirements, and facilitating the improper release of PUA benefits while charging the claimant a fee for their services. Stavole also coordinated with Richard Bencina who assisted in filing PUA claims for individuals. Instead of charging a fee from the claimants directly, Stavole and Bencina diverted certain claimants' PUA benefit funds to their own personal bank accounts. Though Bencina did not file for PUA benefit funds, investigators learned he had collected traditional unemployment during certain time periods of the pandemic.

APPLICABLE RULES, POLICIES, AND PROCEDURES

Confidentiality of ODJFS Information

Ohio Revised Code (ORC) §4141.21 states that, except as provided in ORC §4141.162 and subject to ORC §4141.43,

> … the information maintained by the director of job and family services or furnished to the director by employers or employees pursuant to this chapter is for the exclusive use and information of the department of job and family services in the discharge of its duties and shall not be open to the public … .

As such, the Office of the Ohio Inspector General will not include in this report any of the information obtained during the investigation received by ODJFS in accordance with Ohio Revised Code §4141.21 which would reveal the identity of a claimant.

Ohio Department of Job and Family Services Internal Policy and Procedure Manual *IPP.0005 Processing of ODJFS Work Actions, section VI,* titled *Policy* states in part that:

> B. ODJFS employees shall not, on a normal basis, process any ODJFS work actions for themselves, relatives, co-workers, or friends.

INVESTIGATIVE SUMMARY

In 2020, because of the COVID-19 pandemic and the subsequent increased unemployment of millions of Americans, Congress passed various legislative programs to address the crisis, including the Pandemic Unemployment Assistance (PUA) program. The PUA program

expanded and loosened unemployment eligibility requirements for recipients. Consequently, ODJFS, which was the agency responsible for the distribution of PUA benefits to qualified individuals in Ohio, received an unprecedented number of unemployment compensation claims. This increase in claims necessitated ODJFS to hire intermittent[9] and temporary contracted workers to process the claims.

At the very beginning of the pandemic, due to demand and urgency, PUA claims were quickly paid out to claimants with minimal documentation required. As time passed, however, new identity and income verification measures were implemented, requiring claimants to provide additional information to verify eligibility, including retroactive eligibility, for their PUA claims.

ODJFS also used fraud indicators to evaluate whether the documentation uploaded by claimants appeared "fraudulent" or was missing. When a claimant failed to provide all required documentation or provided fraudulent documentation, ODJFS determined the claim ineligible and subsequently, stopped payment on the claim. Should a claimant have received funds related to a claim determined ineligible, all or a portion of PUA funds received by the claimant were categorized by ODJFS as an "overpayment" and were required to be paid back to the state by the claimant. Should the claimant provide the proper documentation to reconcile the hold on the claim, ODJFS would redetermine the claim as eligible and the PUA funds accrued since the date the claim was held would be released to the claimant in one lump sum.

During a review of ODJFS systems, investigators learned that after a claim was determined ineligible and an overpayment designation was placed on the claim, intermittent or temporary contract employees had the ability to waive all or a portion of the overpayment determination on the claims determined ineligible and/or redetermine the claims as "Eligible." Investigators learned that intermittent or temporary contract employees were not permitted by ODJFS to "waive" overpayment determinations and/or change the eligibility statuses of claims. However, investigators discovered the ODJFS uFACTS database that intermittent and temporary contract employees used in order to process PUA claims did not prevent them from executing these two tasks. Investigators identified the following three possible reasons why an intermittent or

[9] Intermittent employees are temporary employees hired for a limited number of hours and/or a limited timeframe.

temporary contract employee may have improperly waived and/or redetermined a PUA claim they were assigned to:

1. Insufficient training of the intermittent or temporary contract employee.
2. Unintentional error executed by the intermittent or temporary contract employee.
3. Intentional improper action by the intermittent or temporary contract employee to fraudulently waive overpayment and/or redetermine payment of a PUA claim.

During other investigations related to fraudulent PUA claims, the Office of the Ohio Inspector General and ODJFS discovered intermittent and temporary contract employees fraudulently processed PUA claims for family members, friends, and other individuals who were ineligible to receive PUA benefits. During the ODJFS training provided to the intermittent and temporary contract employees, the employees were instructed that they were not permitted to access claims of relatives or friends; however, in several instances, these intermittent and temporary contract employees received monetary kickbacks from the ineligible claimants for improperly approving their claims and releasing their benefits. These monetary kickbacks were often paid in cash or were sent using digital payment platforms (e.g., Cash App®, Venmo®, Zelle®).

PUA claims submitted to ODJFS were reviewed to ensure that they met the requirements of the program and proved their eligibility by providing/uploading all necessary documents to receive benefits. Any claims failing to meet these requirements to prove their eligibility were designated as ineligible and identified as possibly fraudulent. Common reasons for PUA claims being designated as ineligible or as possibly fraudulent were:

- IDV – Identity Verification, meaning the required documents used to verify the claimant's identity (driver's license, state-issued identification card, Social Security card, birth certificate, etc.) were insufficient, appeared to be fake, or did not match other information on the claim.
- EMER – Employment Evidence Requirement, meaning the required documents used to verify and provide evidence of a claimant's employment (W-2, 1099, 1040, etc.) were insufficient, fake, or did not match wages reported.

- PE – Program Eligibility, meaning the reason for the claimants' unemployment status was not related to COVID-19 or their lack of availability did not meet eligibility standards.

Claimants were notified of the reason of denial/ineligibility on the claim and were given the choice to appeal the ineligible determination and provide the required documentation to prove their eligibility. If the required documentation was not uploaded into the claim, the claim remained ineligible/denied.

According to ODJFS, Figueroa-Rivera was assigned to the Office of Unemployment Insurance Operations (OUIO) where she was trained in various areas, including working on regular unemployment claims in the OJI database, as well as PUA claims (specifically, redeterminations and appeals) in the uFACTS database. She was also assigned to take claimants' phone calls during her employment, based on operational needs.

During her initial job training, Figueroa-Rivera was also required to acknowledge that she read and understood the policies and procedures provided by ODJFS, which included guidance on avoiding conflicts of interest when accessing and/or redetermining claims of relatives and/or friends. Specifically, this guidance prohibits all ODJFS intermittent and temporary contract employees from acting on PUA and UI claims of family members and friends stating in part, "ODJFS employees shall not, on a normal basis, process any ODJFS work actions for themselves, relatives, co-workers, or friends."

Documents provided to the Office of the Ohio Inspector General by the Ohio Department of Job and Family Services (ODJFS) included a review of Figueroa-Rivera's activities in uFACTS. The uFACTS database generates an audit trail that tracks every time a claim has been accessed. Specifically, it tracks who had accessed or simply viewed the claim (login credentials), the date and time a claim was accessed, and any changes made to the claim. The system also tracks whether a claim was searched for and accessed by claim number, claimant name, or claimant Social Security number.

According to the ODJFS audit trail review, Figueroa-Rivera accessed, manipulated, and improperly redetermined numerous ineligible claims to eligible by voiding employment verification, identity verification, and/or program eligibility issues without obtaining the required documentation. Her improper actions resulted in the release of previously denied PUA benefits to ineligible claimants.

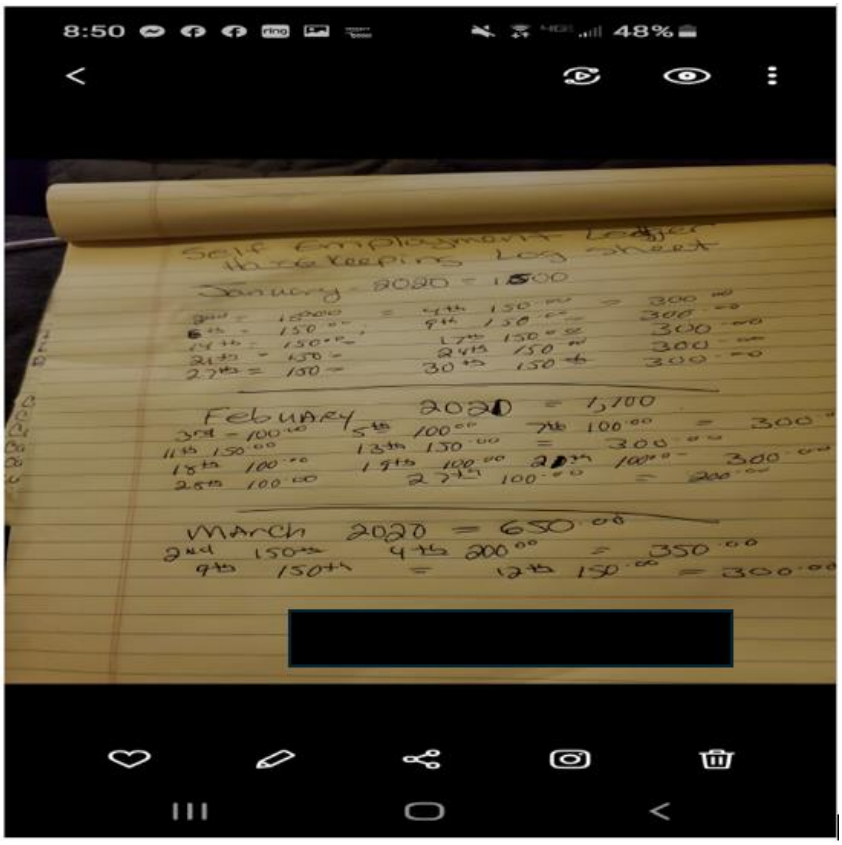
After receiving the ODJFS Chief Inspectors Office referral and their preliminary findings from the audit trail review, investigators from the Office of the Ohio Inspector General opened an investigation to determine any connections between Figueroa-Rivera and the claimants identified as receiving improperly released and potentially fraudulent PUA benefits as a result of Figueroa-Rivera's actions.

Figueroa-Rivera Fraudulent Claims – Known Personal Connections

Investigators obtained and analyzed Figueroa-Rivera's bank records, Verizon phone records, and her assigned State of Ohio email box to determine whether there were any connections between Figueroa-Rivera and the claimants for whom she improperly released previously denied PUA benefits. From their analysis of records, investigators identified 21 previously denied PUA claims Figueroa-Rivera alone (independent of any co-conspirators) improperly accessed and manipulated for people she knew, releasing PUA benefit funds totaling $519,897. The following two PUA claims are examples from the 21 PUA claims identified by investigators, showing how Figueroa-Rivera's improper actions fraudulently released PUA funds to claimants she knew.

1. From their review of Figueroa-Rivera's Verizon phone records, investigators discovered that on May 5, 2021, Figueroa-Rivera made an outgoing phone call to Claimant 1. On May 5, 2021, and October 8, 2021, Figueroa-Rivera accessed Claimant 1's PUA claim and voided the fraud designation and employment evidence verification issue, without uploading the proper documentation to the claim to prove eligibility. Figueroa-Rivera's improper actions within the claim resulted in the release of $14,604 in previously denied PUA benefits to Claimant 1. Investigators also discovered Figueroa-Rivera had entered the following untrue note in the claim, "employment evidence provided on appeal." According to ODJFS, the claimant did not file an appeal, nor did the claimant provide

sufficient evidence of employment. A handwritten "self-employment ledger" was uploaded as their proof of employment, shown below:



Investigators contacted Claimant 1 and they stated they knew Figueroa-Rivera through Figueroa-Rivera's family member. Regarding their claim, they told investigators that Figueroa-Rivera's family member told them that Figueroa-Rivera, "… works for them [ODJFS], she could probably push yours through." The claimant also stated that Figueroa-Rivera charged a $200 fee to assist them in their claim and noted that they paid Figueroa-Rivera in cash.

2. From their review of Figueroa-Rivera's State of Ohio email account, investigators discovered an email sent from Claimant 2 on August 3, 2021, to Figueroa-Rivera requesting help to fix the overpayment on their claim. Investigators learned that on August 10, 2021, Claimant 2 filed an appeal and their claim was accurately determined

ineligible by another ODJFS agent because it lacked the proper proof of employment documentation and proof of identity documents as evidence of eligibility.

However, investigators found that on October 14, 2021, Figueroa-Rivera accessed Claimant 2's claim and improperly changed the employment verification status to "eligible." She added a note stating, "employment evidence provided." The only documents uploaded into the claim were a handwritten "self-employment ledger" and a State of Ohio driver's license – both insufficient to substantiate eligibility for Claimant 2's PUA claim. Figueroa-Rivera's improper actions within the claim resulted in the release of $14,604 in previously denied PUA benefits to Claimant 2.

Investigators contacted Claimant 2 and they stated a family friend named "Fran" had helped them move their claim through the system:

> … She was actually at one of my family-friends' birthday parties and she told me that … well, I told her that I had PUA because she was telling us that she worked for PUA and pushed everybody's stuff through and that she could help me so, I just reached out to her on Facebook after that … .

Claimant 2 also stated that Figueroa-Rivera charged them a fee: "Yea, I had to send her – I think it was like $300 or $400 dollars … ." Though the claimant could not recall the exact amount they paid Figueroa-Rivera, they noted that they believed it was paid via Cash App. When asked if they worked in 2019 or 2020, Claimant 2 replied: "No, I didn't." Claimant 2 admitted to uploading the fake "self-employment ledger," and falsely claiming a COVID-related job loss.

Figueroa-Rivera Fraudulent Claims – No Known Personal Connections

Investigators identified 57 PUA claims Figueroa-Rivera improperly accessed, redetermined, and/or manipulated and found no personal connection between Figueroa-Rivera and the claimants. The total amount fraudulently released by Figueroa-Rivera in benefit funds for these 57 PUA claims was $868,267.18.

Figueroa-Rivera and Stavole Working Together

From their review and analysis of Figueroa-Rivera's bank records, Verizon phone records, and her assigned State of Ohio email box, investigators discovered Figueroa-Rivera had sent and received numerous phone calls and electronic payments from a PUA claimant named Claudine Stavole. Investigators obtained and reviewed Stavole's bank records and discovered activity indicating a relationship between Figueroa-Rivera and Stavole. Specifically, investigators' analysis determined Figueroa-Rivera and Stavole worked in concert to release previously denied PUA benefits to four claimants and to Stavole, herself. A review of Stavole's bank records also revealed the four claimants had paid or attempted to pay Stavole a fee via Cash App. These five claims (four claimants' plus Stavole's) linked Figueroa-Rivera's and Stavole's fraudulent collaboration and improperly released in total, $113,139 in PUA benefits. The following narrative outlines how Figueroa-Rivera's and Stavole's criminal partnership and improper actions fraudulently released funds for two of the five PUA claims:

1. Investigators discovered Claimant 3 paid Stavole $100 via Cash App on May 23, 2021. The next day, Figueroa-Rivera accessed Claimant 3's PUA claim and redetermined an identity verification issue which subsequently released benefit funds to Claimant 3. Investigators learned Claimant 3's claim contained the necessary documents to verify the claimant's identity and was in good standing at the time of Figueroa-Rivera's access. However, Figueroa-Rivera's action of releasing benefit funds to Claimant 3 was linked to Claimant 3's payment of $100 to Stavole the day prior. Additionally, investigators discovered Claimant 3's PUA application was filed using the same email address Stavole listed for her own personal PUA application and for her Cash App account. Investigators contacted Claimant 3. During the telephone conversation, Claimant 3 claimed memory lapses and laughed off the email issue, vaguely suggesting being "hacked." Claimant 3 admitted knowing Stavole but denied recalling payment details or PUA benefits. Investigators concluded Figueroa-Rivera's and Stavole's actions on Claimant 3's claim were improper and fraudulent.

2. Investigators learned about Figueroa-Rivera's and Stavole's association from their review of Figueroa-Rivera's Verizon phone records. Investigators also learned Figueroa-Rivera had accessed Stavole's PUA claim 15 separate times during the period from April 22,

2021, to October 15, 2021. From a comparison of Figueroa-Rivera's Verizon phone records and the times she accessed Stavole's PUA claim, investigators identified 11 incoming and outgoing phone calls that occurred at the same times Figueroa-Rivera accessed Stavole's PUA claim, as shown in the following chart:

#	Date	Verizon phone call time To-From	Rivera's claim Access Time	Incoming/ Outgoing
1	April 22, 2021	8:51 a.m. - 8:58 a.m.	8:55 a.m.	Incoming
2	April 22, 2021	9:17 a.m. - 9:31 a.m.	9:04 a.m.	Outgoing
3	April 22, 2021	2:13 p.m. - 2:21 p.m.	2:20 p.m.	Outgoing
4	April 22, 2021	2:27 p.m. - 2:46 p.m.	2:23 p.m.	Incoming
5	May 26, 2021	2:27 p.m. - 2:43 p.m.	2:26 p.m.	Outgoing
6	May 28, 2021	1:03 p.m. - 1:51 p.m.	1:07 p.m.	Outgoing
7	June 3, 2021	9:50 a.m. - 9:55 a.m.	9:38 a.m.	Outgoing
8	June 9, 2021	9:29 a.m. - 9:32 a.m.	9:28 a.m.	Outgoing
9	June 24, 2021	11:26 a.m. - 11:32 a.m.	11:04 a.m.	Incoming
10	July 1, 2021	4:13 p.m. - 4:20 p.m.	4:07 p.m.	Outgoing
11	July 29, 2021	2:38 p.m. - 2:52 p.m.	2:39 p.m.	Outgoing

Additionally, investigators discovered a handwritten document in Stavole's claim titled, "work log for 2020." This "work log for 2020" was emailed by Stavole to Figueroa-Rivera's State of Ohio email box on May 26, 2021, at 6:34 p.m. and uploaded to Stavole's PUA claim. Approximately 15 minutes prior to the time Stavole emailed the "work log for 2020" to Figueroa-Rivera, investigators found a record indicating Figueroa-Rivera had received a phone call from Stavole at 6:20 p.m. that was six-minutes in duration. Figueroa-Rivera entered the following note in Stavole's claim, "all identity documents submitted received and reviewed." However, investigators found Stavole's claim did not have the required identity verification documents and her Social Security number in her claim was incorrect. Investigators discovered Figueroa-Rivera had accessed and manipulated Stavole's claim by voiding the fraud designation, redetermining the identity verification issue without uploading the required documents to the claim to prove eligibility, and failed to review for accuracy the information (Social Security number) provided by Stavole. Investigators concluded Figueroa-Rivera's actions within Stavole's claim were improper and resulted in the fraudulent release of $33,975 in previously denied PUA benefits to Stavole.

Claudine Stavole and Richard Bencina Conducting Fraud Independent of Figueroa-Rivera

From their review of Claudine Stavole's personal bank account and Verizon phone records, investigators discovered additional PUA benefits were deposited into her bank account that were not related to her PUA claim. Records maintained by ODJFS confirmed that Stavole's personal bank account was listed as a direct deposit account for two PUA claimants (Claimant A and Claimant B) whose claims Figueroa-Rivera did not access, indicating that Stavole was conducting PUA fraud independent of Figueroa-Rivera. Specifically, investigators discovered Stavole's personal bank account was linked as a direct deposit account for both claims from September to October, 2020. Investigators found that during this period, $2,745 in PUA benefits for Claimant A was deposited in Stavole's personal bank account.

Claudine Stavole's Personal Bank Account	
Claimant	Total PUA Benefits Deposited
Claimant A	$2,745.00
Claimant B	$0.00
	$2,745.00

Claimants A and B

Investigators contacted Claimant A and Claimant B separately and learned during their interviews that they were married. Claimant A recalled a former neighbor had once spoke to them about PUA benefits, and Claimant A suspected that neighbor had been taking money from them at the time, related to their PUA benefits. They did not recall the neighbor's name, however when investigators mentioned the name "Claudine," they responded, "Yeah! That's her! She was doing this!" Claimant A explained that Stavole was trying to "sell" them "on this" and explained, "She was trying to tell us, 'I'll give you this much money … You do this …,' like she was trying to make it like a business."

Claimant B recalled to investigators that former neighbor and friend of a friend, Stavole, offered to "guide" them through the PUA process stating, "… I don't know if she had like a government position or … she literally made it seem like she was … an agent, you know, social worker … somebody like that." Claimant B stated that after they (Claimants A and B) received their initial

PUA benefits deposited into their personal bank accounts, Stavole demanded a fee, telling them, "I have a fee for my services, you owe me." Claimant B added, "I think she wanted like three grand," and stated that they believed they had paid Stavole via Cash App or Venmo. Investigators did not find evidence of this payment on either app. Claimant B said they gave Stavole their own information, but they did not know how Stavole obtained Claimant A's information.

However, after the initial deposit to the claimants, investigators discovered the direct deposit information for both claims was changed. Further PUA benefit payments released by ODJFS were diverted: $2,745 of Claimant A's benefits were direct deposited into Stavole's personal bank account, and $2,934 of Claimant B's benefits were direct deposited into another personal bank account owned by Richard Bencina. During their interviews, both claimants had told investigators that there was a male working with Stavole but neither could remember the male's name.

Upon further review, investigators identified seven PUA claims (Claimants A, B, D, E, F, H, and I) listing Bencina's personal bank account at one time as the direct deposit account for the claims. Investigators verified Figueroa-Rivera did not access these seven claims (Claimants A, B, D, E, F, H, and I), indicating that Stavole and Bencina were conducting PUA fraud independent of Figueroa-Rivera on the seven claims. Investigators determined that in total, $27,828 in PUA benefits from six of the seven claims were deposited into Bencina's personal bank account, as shown below.

Richard Bencina's Personal Bank Account	
Claimant	**Total PUA Benefits Deposited**
Claimant A	$0.00
Claimant B	$2,934.00
Claimant D	$2,205.00
Claimant E	$2,646.00
Claimant F	$2,493.00
Claimant H	$2,844.00
Claimant I	$14,706.00
	$27,828.00

Investigators contacted Claimants D, E, and F. Each claimant that was contacted stated in their own words that they were unaware that all or part of their PUA benefits were being diverted into another person's bank account. Some claimants stated that they were unaware they even had a PUA claim. Most claimants reported that they had a personal relationship with at least one of the co-conspirators.

Investigators concluded that Stavole and Bencina were complicit in the fraudulent release in total, of $103,344 in PUA benefits to otherwise ineligible claimants.

Stavole/Bencina	
Claimant	Total Amount of PUA Paid Out On Claim
Claimant A	$7,635.00
Claimant B	$7,446.00
Claimant D	$22,320.00
Claimant E	$22,320.00
Claimant F	$17,910.00
Claimant H	$11,007.00
Claimant I	$14,706.00
	$103,344.00

Claudine Stavole, Richard Bencina and Francesca Figueroa-Rivera Conducting Fraud Together

Upon further review of ODJFS records, investigators identified two additional PUA claims (Claimant C and Claimant G) indicating Stavole, Bencina, and Figueroa-Rivera had collaborated to fraudulently release PUA benefits, totaling $52,902. Investigators contacted Claimants C and G. During their interviews, Claimant C told investigators that they were unaware that all or part of their PUA benefits were being diverted into another person's bank account and Claimant G attested that they were unaware that they even had a PUA claim.

The following example details what investigators discovered regarding the actions of Stavole, Bencina, and Figueroa-Rivera and how they collaborated together to defraud Claimant C and the State of Ohio.

Claimant C's PUA Claim

Investigators discovered that between July 22 and August 12, 2020, $1,167 of Claimant C's PUA benefits were deposited into Bencina's personal bank account. Additionally, investigators found that Bencina's IP address[10] accessed Claimant C's claim multiple times from August 2020 to January 2021. Later, from October 29 to November 5, 2021, Figueroa-Rivera accessed Claimant C's claim five times and redetermined the employment verification and program eligibility issues in the claim, releasing and validating previously denied PUA benefits. Figueroa-Rivera entered a note in uFACTS, "employment evidence provided"; however, according to ODJFS, the handwritten proof of employment uploaded to the claim was insufficient.

Claimant C's Interview

Claimant C told investigators that Bencina helped them by setting up their PUA claim and uploading the required documents to prove eligibility. Claimant C added that they had access to their PUA claim but never changed the password after Bencina set it up. Claimant C stated Bencina told them, "Everyone gets $8,000 with the Pandemic Unemployment Assistance Program … ," and assumed Bencina profited from helping others with their claims. When asked if they paid Bencina, Claimant C said, "… he didn't like, make me give him anything … but I know he didn't do it for free … ."

Claimant C also told investigators that Stavole used to "hang out" at Bencina's house. Claimant C noted that Stavole said she had a friend who could help them get their money faster, but Claimant C would have to pay her a fee. Claimant C explained that the plan was for Claimant C to pay Stavole, and Stavole would then pay Figueroa-Rivera for her help. However, when Stavole raised the fee, Claimant C refused to pay. Claimant C said Stavole had her boyfriend[11] call Claimant C to confront them about not paying. Claimant C noted to investigators that they never had a JP Morgan Chase account and were not aware that any of their PUA benefits were being deposited to another bank account other than their own account.

[10] An IP address, or Internet Protocol, is a unique string of numbers separated by periods that identify a specific computer attached to a network.

[11] Claimant C stated that Stavole's boyfriend was Figueroa-Rivera's spouse.

Investigators concluded that Stavole, Bencina, and Figueroa-Rivera collaborated in the fraudulent release, in total, of $52,902 in PUA benefits to otherwise ineligible claimants.

Figueroa-Rivera/Stavole/Bencina	
Claimant	Total Amount of PUA Paid Out On Claim
Claimant C	$34,353.00
Claimant G	$18,549.00
	$52,902.00

Interview with Claudine Stavole

Investigators contacted Stavole by phone to discuss her PUA claim. Stavole told investigators, "I got it through my job, my work closed down for COVID, I work at a restaurant [in] downtown Cleveland … ." She confirmed to investigators that the email address listed on her claim was correct. When asked if anyone at ODJFS helped her move her claim forward, she replied, "Not that I know of." When investigators asked her about the handwritten ledger titled "work log for 2020" uploaded to her claim for employment verification, she vaguely explained that she worked at a, "… family restaurant so I don't know if I needed to put in something handwritten then yea, that's what I did … ."

Investigators asked Stavole if she knew the person at ODJFS to whom she emailed her handwritten ledger titled "work log for 2020" document. Stavole initially said the only time she remembered emailing anybody was when "they" needed her to email information to them. When asked specifically, "who was that person," Stavole responded, "I have no clue." When investigators told Stavole that they believed she did know the person she emailed, she responded, "I do know someone that maybe ended up working there … ." When asked to name that person, Stavole stated, "You tell me. You have all the paperwork in front of you … ," and continued to claim that she could not remember the person's name. Investigators asked Stavole if she was being truthful, and she responded stating, "Yes, I'm being truthful." Stavole then told investigators that it was not a good time to continue the conversation and asked them to provide their contact number to her to call them back. Both parties agreed on a call back date and time and ended the call. Shortly thereafter, investigators spoke with Stavole's attorney to request an in-person interview and Stavole's attorney declined the interview on her behalf.

Interview with Francesca Figueroa-Rivera

On November 21, 2024, investigators contacted Figueroa-Rivera by phone to schedule an in-person interview. Figueroa-Rivera stated she would call investigators back; however, she made no further attempts to contact investigators to schedule an interview. On February 4, 2025, investigators made an unannounced visit to the Cuyahoga County Job and Family Services office located in Cleveland, Ohio to conduct an in-person interview with Figueroa-Rivera. Investigators explained to Figueroa-Rivera that the interview was voluntary, that she had the choice to not speak with investigators, and that if she agreed to be interviewed, she could end the interview at any time. After noting this information, investigators interviewed Figueroa-Rivera.

When asked about the former position she held with ODJFS at the state level, Figueroa-Rivera explained she was hired as a temporary state employee and worked in appeals and adjudication, that she was trained to work on both traditional and pandemic unemployment claims, and that she worked in the PUA Call Center as needed. Investigators asked Figueroa-Rivera about the appeals process; specifically, how a claimant uploads their required documents to appeal an ODJFS decision on their claim. Figueroa-Rivera stated, "There were several places to upload documents during this time … that's why you had to check every place there were documents." She further explained that if the documents were not uploaded to a claim, a claimant, "… would have to resend [their] documents … if they're not in there or if they're blurry … ."

Investigators asked Figueroa-Rivera about her signed acknowledgement of the ODJFS policies and procedures when beginning her position with the State of Ohio; specifically, the policy that states in part that: "ODJFS employees shall not, on a normal basis, process any ODJFS work actions for themselves, relatives, coworkers, or friends." Investigators asked Figueroa-Rivera if she remembered accessing the PUA claims of any friends, coworkers, or relatives. Figueroa-Rivera stated, "No." Investigators asked Rivera to confirm a relative's name whose claim Figueroa-Rivera had accessed. Figueroa-Rivera stated, "Yeah, I think we're going to end this interview. I'm going to get an attorney. I feel like this is going down a route that I'm uncomfortable with." Investigators ended the interview and no attorney has contacted investigators representing Figueroa-Rivera.

Summary of Findings

In summary, from their analysis of records and information obtained from interviews, investigators from the Office of the Ohio Inspector General determined the following individuals conducted improper and fraudulent actions on 92 PUA claims:

- Figueroa-Rivera working alone (with known connection with claimants) on 21 PUA claims, totaling $519,897.
- Figueroa-Rivera working alone (with no known connection with claimants) on 57 PUA claims, totaling $868,267.18.
- Figueroa-Rivera and Stavole working together as co-conspirators on five PUA claims, totaling $113,139.
- Stavole and Bencina working together as co-conspirators independent of Figueroa-Rivera on seven PUA claims, totaling $103,344.
- Figueroa-Rivera, Stavole, and Bencina working together as co-conspirators on two PUA claims, totaling $52,902.

	Number of Fraudulent Claims	Dollar Amount of Fraudulent Claims
Figueroa-Rivera (Fraudulent - Known Connection)	21	$519,897.00
Figueroa-Rivera (Fraudulent - No Known Connection)	57	$868,267.18
Figueroa-Rivera/Stavole	5	$113,139.00
Stavole/Bencina	7	$103,344.00
Figueroa-Rivera/Stavole/Bencina	2	$52,902.00
TOTAL	92	$1,657,549.18

In total, 92 PUA claims were determined by investigators as fraudulent, totaling $1,657,549.18 in ineligible PUA benefits.

CONCLUSION

On September 2, 2022, the Office of the Ohio Inspector General received a referral from the Ohio Department of Job and Family Services (ODJFS) Chief Inspectors Office reporting Intermittent Customer Service Representative (CSR) Francesca Figueroa-Rivera accessed, manipulated, and improperly redetermined numerous ineligible claims to eligible by voiding employment verification, identity verification, and/or program eligibility issues without

obtaining the required documentation. Her improper actions during her employment with ODJFS released previously denied PUA benefits to otherwise ineligible claimants.

Investigators from the Office of the Ohio Inspector General obtained and analyzed Figueroa-Rivera's bank records, Verizon phone records, and her assigned State of Ohio email box to determine whether there were any connections between Figueroa-Rivera and the claimants for whom she improperly released previously denied PUA benefits. From their analysis of these records and open-source social media records, investigators discovered Figueroa-Rivera had accessed, manipulated, and released PUA benefits, sometimes for a fee, for relatives, friends, and friends of relatives.

During Figueroa-Rivera's tenure as an intermittent CSR with ODJFS, investigators identified 21 PUA claims Figueroa-Rivera alone (independent of any co-conspirators) improperly accessed, redetermined, and/or manipulated for claimants she knew. The total amount fraudulently released by Figueroa-Rivera in benefit funds for these 21 PUA claims is $519,897.

Accordingly, the Office of the Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

During Figueroa-Rivera's tenure as an intermittent CSR with ODJFS, investigators identified 57 PUA claims Figueroa-Rivera improperly accessed, redetermined, and/or manipulated and found no personal connection between Figueroa-Rivera and the claimants. The total amount fraudulently released by Figueroa-Rivera in benefit funds for these 57 PUA claims is $868,267.18.

Accordingly, the Office of the Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

From their review and analysis of Figueroa-Rivera's bank records, Verizon phone records, and her assigned State of Ohio email box, investigators discovered Figueroa-Rivera had sent and received numerous phone calls and electronic payments from a PUA claimant named Claudine Stavole. Investigators obtained and reviewed Stavole's bank records and discovered activity

indicating a relationship between Figueroa-Rivera and Stavole. Investigators also discovered Claudine Stavole's PUA claim was accessed an excessive amount of times by Figueroa-Rivera. Investigators found phone call activity between Figueroa-Rivera and Stavole that corresponded directly to Figueroa-Rivera's access to Stavole's claim. Investigators also discovered Stavole was diverting claimants' PUA benefits into her own personal bank account. Investigators concluded Figueroa-Rivera and Stavole worked in concert to release previously denied PUA benefits to four claimants and to Stavole, herself. A review of Stavole's bank records also revealed the four claimants had paid or attempted to pay Stavole a fee via Cash App. These five claims (for four claimants plus Stavole's claim) linked to Figueroa-Rivera's and Stavole's fraudulent collaboration improperly released in total, $113,139 in PUA benefits.

Accordingly, the Office of the Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

From their review of Stavole's personal bank account and Verizon phone records, investigators discovered additional PUA benefits were deposited into her bank account that were not related to her PUA claim. Records maintained by ODJFS confirmed that Stavole's personal bank account was listed as a direct deposit account for two PUA claimants (Claimant A and Claimant B) whose claims Figueroa-Rivera did not access, indicating that Stavole was conducting PUA fraud independent of Figueroa-Rivera. Specifically, investigators discovered Stavole's personal bank account was linked as a direct deposit account for both claims from September to October 2020. During this period, investigators found $2,745 in PUA benefits for Claimant A was deposited in Stavole's personal bank account. However, upon further review of the two claims, investigators discovered the direct deposit information for both claims was changed. Specifically, PUA benefit payments released by ODJFS were diverted: $2,745 of Claimant A's benefits were direct deposited into Stavole's personal bank account, and $2,934 of Claimant B's benefits were direct deposited into another personal bank account owned by Richard Bencina. During their interviews, both claimants had told investigators that there was a male working with Stavole but neither could remember the male's name.

From their review of ODJFS records, investigators identified seven PUA claims (Claimants A, B, D, E, F, H, and I) listing Bencina's personal bank account at one time as the direct deposit account for the claims. Investigators verified Figueroa-Rivera did not access these seven claims, indicating that Stavole and Bencina were conducting PUA fraud independent of Figueroa-Rivera on the seven claims. Investigators determined that $27,828 in PUA benefits from six of the seven claims were deposited into Bencina's personal bank account.

Investigators contacted Claimants D, E, and F. Each claimant that was contacted stated in their own words that they were unaware that all or part of their PUA benefits were being diverted into another person's bank account. Some claimants stated that they were unaware they even had a PUA claim. Most claimants reported that they had a personal relationship with at least one of the co-conspirators. Investigators concluded that Stavole and Bencina were complicit in the fraudulent release in total, of $103,344 in PUA benefits to otherwise ineligible claimants.

Accordingly, the Office of the Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

Upon further review of ODJFS records, investigators identified two additional PUA claims (Claimant C and Claimant G) indicating Stavole, Bencina, and Figueroa-Rivera had collaborated to fraudulently release PUA benefits. Investigators contacted Claimants C and G. During their interviews, Claimant C told investigators that they were unaware that all or part of their PUA benefits were being diverted into another person's bank account and Claimant G attested that they were unaware that they even had a PUA claim. Claimant C also told investigators that Bencina helped them set-up their PUA claim and upload the required documents to prove eligibility. Investigators found a note entered in uFACTS by Figueroa-Rivera stating, "employment evidence provided"; however, according to ODJFS, the handwritten proof of employment uploaded to the claim was insufficient. Claimant C also told investigators that Stavole used to "hang out" at Bencina's house and that Stavole claimed she had a friend who could help them get their money faster if they would pay her a fee. Investigators discovered Claimant C's PUA benefits were deposited into Bencina's personal bank account. Investigators also found that Bencina's IP address accessed the claimant's claim multiple times from August

2020 to January 2021. Later, from October 29 to November 5, 2021, Figueroa-Rivera accessed Claimant C's claim five times and redetermined the employment verification and program eligibility issues in the claim, releasing and validating previously denied PUA benefits. Investigators concluded that Stavole, Bencina, and Figueroa-Rivera collaborated in the fraudulent release in total, of $52,902 in PUA benefits to otherwise ineligible claimants.

Accordingly, the Office of the Inspector General finds reasonable cause to believe a wrongful act or omission occurred in this instance.

In total, 92 PUA claims were determined by investigators as fraudulent totaling $1,657,549.18 in ineligible PUA benefits.

	Number of Fraudulent Claims	Dollar Amount of Fraudulent Claims
Figueroa-Rivera (Fraudulent - Known Connection)	21	$519,897.00
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Figueroa-Rivera/Stavole/Bencina	2	$52,902.00
TOTAL	92	$1,657,549.18

RECOMMENDATION(S)

The Office of the Ohio Inspector General has determined that no recommendations are warranted for this report of investigation.

REFERRALS

The Office of the Ohio Inspector General is referring this report of investigation to the Cuyahoga County Prosecutor's Office and the Ohio Auditor of State for consideration.

STATE OF OHIO
OFFICE OF THE INSPECTOR GENERAL
RANDALL J. MEYER, INSPECTOR GENERAL

NAME OF REPORT: Ohio Department of Job & Family Services

FILE ID #: 2022-CA00023

KEEPER OF RECORDS CERTIFICATION

This is a true and correct copy of the report which is required to be prepared by the Office of the Ohio Inspector General pursuant to Section 121.42 of the Ohio Revised Code.

Jill Jones
KEEPER OF RECORDS

CERTIFIED
September 10, 2025

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