STATE OF FLORIDA
DEPARTMENT OF FINANCIAL SERVICES
DIVISION OF PUBLIC ASSISTANCE FRAUD

AFFIDAVIT OF COMPLAINT

County of
Palm Beach

DFS CASE NUMBER:
PB-90-52999
DCF CASE NUMBER:
1374918130

NAME(S) **Alexia Salome Harris** aka Alexia Pagan
SOCIAL SECURITY NO. [redacted] DOB April 26, 1988
RACE White SEX F HEIGHT 5'0" WEIGHT 110 lbs. HAIR Brown EYES Brown
LAST KNOWN ADDRESS 1372 The Pointe Dr, West Palm Beach, FL 33409
OTHER COMMENTS Florida Driver License Number: H620-017-88-646-0

Before me, personally appeared **Nick Goodsell**, Investigator, Florida Department of Financial Services, Division of Public Assistance Fraud, who first being duly sworn, deposes and says that he has reason to believe that: **Alexia Harris**, on various days between the **1st day of August 2019** and the **30th day of November 2020**, in **Palm Beach County**, State of Florida, did knowingly, by means of a false statement, misrepresentation, impersonation, or other fraudulent means fail to disclose a material fact used in making a determination as to her qualification to receive aid or benefits under a state or federally funded assistance program; or did knowingly fail to disclose a change in circumstances in order to obtain or continue to receive aid or benefits under such a program in an amount larger than that to which she was entitled; or did knowingly aid and abet another person in the commission of any such act, contrary to the provisions of Section 414.39(1), Florida Statutes; specifically:

Records of the Florida Department of Children and Families (Department) reflect that on or about July 3, 2019, and January 7, 2020, during reviews of her eligibility to receive public assistance, **Alexia Harris** using the name Alexia Pagan**:**

- Reported employment at Perfect Cleaners, earning $960.00 bi-weekly and submitted Verification of Employment forms reflecting gross earnings of $960.00 bi-weekly from Perfect Cleaners.
- Reported no other earned income available to her household.

Records of the Department reflect that on or about August 3, 2020, during a review of her eligibility to receive public assistance, **Alexia Harris** using the name Alexia Pagan**:**

- Reported past employment from Perfect Cleaners effective end date January 1, 2020.
- Reported employment at Riccardo Landmark Insurance earning $1,800.00 monthly and submitted a Verification of Employment form reflecting gross earnings of $1,800.00 monthly from Landmark Insurance & Financial Services Inc.
- Reported no other earned income available to her household.

Furthermore, during the aforementioned review processes, **Alexia Harris** acknowledged that the reported information is true to the best of her knowledge and acknowledged her responsibility to report any changes in her household

(Witnesses 1; Enclosures B through D-3)

INVESTIGATION REVEALED ALEXIA HARRIS:

- Was in fact, employed by Landmark Insurance & Financial Services Inc. from at least July 12, 2019 through at least November 30, 2020.
- Received her first pertinent paycheck on July 12, 2019 and her last pertinent paycheck on November 27, 2020, earning total gross wages of $70,740.73 during this period.
- Failed to report her income from Landmark Insurance & Financial Services Inc., to the Florida Department of Children and Families, during the period of July 12, 2019 through August 3, 2020.
- Failed to report her true and accurate income from Landmark Insurance & Financial Services Inc., to the Florida Department of Children and Families, during the period of August 3, 2020 through November 30, 2020.
- Submitted to the Department, Verification of Employment forms which were falsified in that the they reflected lesser hours than actual hours worked, lesser hourly rate than actual hourly rate and lesser gross wages than actual gross wages received.
- Received actual bi-weekly gross earnings ranging between $1,540.00 and $3,072.89 during the period of July 24, 2020 through November 30, 2020.
- Made false statements during her January 7, 2020, and August 3, 2020 eligibility review processes.

(Witnesses 3 and 4; Enclosures E through G)

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CONCLUSION:

Alexia Harris, by means of false statements and/or omissions, failed to report her income from Landmark Insurance & Financial Services Inc., to the Florida Department of Children and Families, during the period of July 12, 2019 through August 3, 2020 at which time she failed to report her true and accurate income from Landmark Insurance & Financial Services Inc., to the Florida Department of Children and Families, during the period of August 3, 2020 through November 30, 2020.

As a result of her actions, **Alexia Harris** received $3,559.00 in Food Assistance Program benefits during the period of September 2019 through November 2020, to which she was not legally entitled. Additionally, **Alexia Harris** received or caused disbursement of $1,019.11 in Medicaid program benefits during the period of August 2019 through February 2020; for an aggregate amount of $4,578.11 to which she was not legally entitled.

(Witness 2; Enclosure H)

A list of witnesses who can identify **Alexia Harris** and present testimony and documents in support of this complaint is attached.

Signature Affiant/Complainant

State of Florida
County of Palm Beach

Sworn to and subscribed before me
this 8 day of July, A.D. 2021 by
Nick Goodsell
(name of person(s) acknowledged)
who is /are personally known to me and did take an oath.

Signature _____ Type or Print Name Vincent Esposito
Title Notary Public

My Commission Expires

VINCENT ESPOSITO
Commission # GG 283189
Expires December 11, 2022
Bonded Thru Troy Fain Insurance 800-385-7019