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9/20/23

To: Det. Mario Fajardo
Division of Investigative & Forensic Services
Bureau of Insurance Fraud
401 NW 2nd Avenue, Suite N-321
Miami, FL 33128

Re: OSP Case # 2023-0365 MIA

The Florida Department of Financial Services presented the Undersigned with an investigation involving the following targets: Christi Olson-3/2/76; Ryan Vazquez-12/3/89; Leonel Ravelo-7/18/88; Leonardo Alfonso-4/7/00; Mercedes Linares-11/2/69.

After review and careful consideration of both the underlying facts, and the legal analysis provided by the original prosecuting agency (*See Miami SAO Interoffice Memorandum dated May 23, 2023*), the Undersigned has determined the Office of Statewide Prosecution (OSP) will no longer review this matter. Present are both legal and factual issues that would prevent OSP from moving forward in good faith. First, investigators initiated this case with the Miami SAO, which allowed the investigating prosecutor to become familiar with the parties involved and determine appropriate strategies to secure convictions for any illegal activity found. OSP was not consulted until after the above-named targets were arrested and the Miami SAO formally declined to prosecute. OSP was not able to implement any investigative strategies to shape the case, but was left with only an option of trying to salvage the case. Additionally, since the case wasn't initially brought to OSP, and arrests were made, OSP was left with only weeks to file the case. This prevented OSP from investigating the matter in any way.

Second, the Miami SAO submitted a letter declining the case, which laid out the reasons why they no longer wished to pursue the matter. The Undersigned had an opportunity to review that letter and found very well researched legal and factual issues as to why they ended prosecution. Due to not having enough time to review their entire investigation, and not being privy to the conversations between the Miami SAO and defense counsel, the assertions made in the letter must be considered at face value. It appears that an appropriate defense to the allegations was presented to the prior Miami SAO prosecutor, which allowed

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him to come to the conclusion that there was no reasonable likelihood of conviction by a jury if the State moved forward.

For these reasons, OSP is declining the case.

s/James Harris

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