

From: [Maggie Finnegan](#)
To: [Legal Help LLC](#)
Subject: FW: URGENT – Fraudulent Insurance Affidavit and Forgery at Broward CarMax Store – Immediate Action Required
Date: Monday, June 2, 2025 12:10:17 PM
Attachments: [image004.png](#)
[Martins - 5.30.25 signed ltr to Legal Help for you with insurance affidavit\(892478.1\).pdf](#)

Good morning,

CarMax's position on this matter as stated in the attached letter remains unchanged.

Maggie D. Finnegan | Associate General Counsel

Director, Litigation

CarMax | 12800 Tuckahoe Creek Parkway, Richmond, Virginia 23238

Cell | (804) 928-8213

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From: Legal Help LLC <info@legalhelp4y.com>
Sent: Monday, June 2, 2025 10:16 AM
To: Lisa A Mondejar <lisa_a_mondejar@carmax.com>
Cc: Cindy Beale <cindy_beale@carmax.com>; 2025_01106 _ Martins_ Phillip_ Insurance issue E_Mail <{F303766}.CarMaxLegal@e9331.imanage.work>
Subject: [EXTERNAL] URGENT – Fraudulent Insurance Affidavit and Forgery at Broward CarMax Store – Immediate Action Required

Dear CarMax Legal Department,

We write on behalf of our client, Mr. Phillip Martins, regarding the sale of a BMW at your Broward County store location. This communication supplements our prior Notice of Intent to Sue, and provides new conclusive evidence of fraudulent conduct and forgery committed by your sales staff.

Mr. Martins traded in a vehicle fully insured under a valid 2024 Geico policy (see attached).

Your salesperson never instructed or assisted Mr. Martins to call Geico from the dealership — a critical step under Florida law when transferring coverage to a financed vehicle.

Instead, the employee accessed Mr. Martins' past insurance history and falsely entered a canceled 2019 policy in the official CarMax Insurance Affidavit, falsely claiming it covered the BMW.

The 2019 policy was inactive and unrelated to the vehicle sold, which constitutes fraudulent misrepresentation and forgery of a legal document.

The false statement in the affidavit was made:

Knowingly and with intent to bypass company procedure for immediate vehicle delivery.

Without verifying actual coverage or taking any step to ensure legal compliance with Florida's Financial Responsibility Laws.

Such actions violate:

Florida Statute § 817.034 – Organized Fraudulent Practices

Florida Statute § 319.27 – Fraud in Vehicle Title and Insurance Affidavits

Florida Statute § 627.7263 – Transfer of Insurance upon Sale

FDUTPA (Fla. Stat. § 501.204) – Deceptive and Unfair Trade Practices

FTC Act § 5 – Prohibition of Misleading Commercial Practices

This conduct not only placed Mr. Martins at legal risk but also jeopardized public safety, leaving him unknowingly uninsured when he drove off the lot. This is corporate negligence and a clear breakdown of your internal compliance protocols.

We hereby demand:

Full cancellation of the financing contract, given that the vehicle was sold under fraudulent insurance representation.

A written response by June 8, 2025, confirming your position.

Preservation of all employee records, internal messages, surveillance footage, and

phone recordings related to this sale.

Failing that, we will:

Proceed with a lawsuit in Palm Beach County, Florida seeking \$200,000+ in damages for fraud, negligence, emotional distress, and loss of use.

File formal complaints with the Florida AG, Department of Financial Services, FTC, and CFPB.

Publicly disclose this matter through appropriate media and consumer alert channels.

We trust CarMax will treat this matter with the gravity it deserves. A response before close of business on June 7, 2025 is expected to avoid escalation.

Respectfully,



Peter Aldo-Legal Paralegal
160 W Camino Real # 102
Boca Raton, Florida 33432
info@legalhelp4y.com
(786) 588-1202

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From: Lisa A Mondejar <lisa_a_mondejar@carmax.com>

Sent: Friday, May 30, 2025 12:39 PM

To: Roger Scotton <rs@legalhelp4y.com>

Cc: Cindy Beale <cindy_beale@carmax.com>; 2025_01106 _ Martins_ Phillip_ Insurance issue E_Mail <[F303766}.CarMaxLegal@e9331.imanage.work](mailto:{F303766}.CarMaxLegal@e9331.imanage.work)>

Subject: Phillip Daniel Martins [IMAN-CARMAXLEGAL.FID303766]

Please see the attached documents from Cindy Beale. Do not hesitate to contact Cindy if you have any questions.

Lisa Mondejar

Senior Specialist – Legal

CarMax

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