

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

Case No.: _____

ALEXANDRA R. WILD, a minor, by
and through JENNIFER T. SASSONE,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

FLORIDA DEPARTMENT OF
HIGHWAY SAFETY AND MOTOR
VEHICLES (DHSMV); MIAMI-
DADE COUNTY TAX COLLECTOR;
BROWARD COUNTY TAX
COLLECTOR,

Defendant.

CLASS ACTION COMPLAINT

Plaintiff, ALEXANDRA R. WILD, a minor, by and through her parent and natural guardian, JENNIFER T. SASSONE (hereinafter "Plaintiff"), individually and on behalf of all others similarly situated, sues Defendants, the Florida Department of Highway Safety and Motor Vehicles (hereinafter "Defendant" or "DHSMV"), and the Miami-Dade and Broward County Tax Collectors and alleges:

JURISDICTION AND VENUE

1. This is an action for damages in excess of \$10,000,000 exclusive of interest, costs, and attorneys' fees.

2. Venue is proper in Broward County, Florida, as the incident giving rise to this complaint occurred at the Pompano Beach Citi Centre DHSMV branch located within this jurisdiction.
3. All conditions precedent to the filing of this lawsuit, including the notice requirement under Fla. Stat. § 768.28(6), have been satisfied. Plaintiff provided timely written notice of intent to file a claim to the appropriate agency and the Florida Department of Financial Services.

PARTIES

4. Plaintiff, ALEXANDRA R. WILD, is a 17-year-old resident of Broward County, Florida, and at all material times was a minor. She brings this action through her mother, JENNIFER T. SASSONE.
5. Defendant, the Florida Department of Highway Safety and Motor Vehicles, is a state agency responsible for the administration of driver licensing services throughout Florida and operates numerous branches including the Pompano Beach Citi Centre location.
6. Defendants Miami-Dade County Tax Collector and Broward County Collectors have assumed responsibility for driver license renewals.

CLASS ACTION ALLEGATIONS

7. The Plaintiffs bring this action pursuant to Florida Rule of Civil Procedure 1.220(b)(2) and (b)(3) on behalf of herself and all others similarly situated who have been forced to wait in unreasonably long lines or to camp out overnight at DHSMV facilities due to appointment shortages and appointment scalping.

8. The class is defined as: “All individuals who have been denied timely access to DMV services in Florida as a result of appointment scalping, scheduling mismanagement, or forced overnight waiting at state-run DMV branches.”
9. For purposes of this Complaint, “appointment scalping” means the practice of using automated software programs (“bots”), fake identities, or other deceptive methods to reserve, hoard, or otherwise obtain multiple appointment slots at DMV facilities with the intent to resell, transfer, or market those appointments for profit. This practice artificially restricts access to legitimate customers, causing increased wait times, overcrowding, and undue hardship for individuals seeking timely public services.
10. The members of the class are so numerous that joinder is impracticable.
11. There are questions of law and fact common to the class, including:
 - a. Whether Defendant implemented and maintained a scheduling system vulnerable to automated scalping and reselling;
 - b. Whether Defendant had a duty to ensure public access to DMV appointments free from exploitation;
 - c. Whether Defendant’s conduct resulted in foreseeable harm to class members;
 - d. Whether injunctive relief is warranted.
12. The claims of the Plaintiff are typical of the claims of the class, as all have suffered injury due to systemic delays and failures in access to DMV services.

GENERAL ALLEGATIONS

13. On or about the night of January 9, 2025, and into the early morning of January 10, 2025, Plaintiff was directed by DHSMV staff and agents to return to the Pompano Beach Citi Centre branch and camp out overnight in order to obtain driver license services.
14. DHSMV failed to provide adequate security, lighting, or facilities to ensure the safety of individuals — including minors — required to remain on the premises overnight.
15. Plaintiff complied with these directions and was forced to remain outside the facility overnight, during which time she was subjected to harassment, assault, and severe emotional distress.
16. Investigative reporting and public records confirm that DHSMV appointment systems have been exploited by third parties using bots and fake accounts to scalping appointments for \$25-\$250, creating artificial scarcity.
17. These conditions were known or should have been known by DHSMV, and were acknowledged in public statements by Broward and Miami-Dade officials.

e. Sun-Sentinel - June 11, 2025

“Broward County Commissioners on Tuesday passed a law making it illegal to sell DMV appointments — a response to the widespread abuse of Florida’s driver license scheduling system.”

f. NBC 6 Miami – June 11, 2025

“People are selling appointments to get a driver’s license and that’s not right,” Commissioner Michael Udine said. “It’s illegal now.”

g. CBS Miami and Miami-Dade Tax Collector – March 17, 2025

“We know who they are and how they operate. We will not accept any appointment

obtained through system abuse. ... Our office is committed to ensuring that all residents have fair and equal access to services without interference from those seeking to exploit the system.” – Miami-Dade County Tax Collector Dariel Fernandez

18. Defendants had actual or constructive knowledge of the conditions at this location and was aware that overnight stays were occurring regularly as a result of its systemic failure to manage appointments, staffing, and facility access.
19. Defendants owed a duty of care to provide a safe and secure environment for individuals, especially minors, utilizing its public services.
20. Defendants failed to address these foreseeable and ongoing harms, disproportionately affecting the most vulnerable members of the public.

COUNT I – NEGLIGENCE

21. Plaintiff re-alleges and incorporates paragraphs 1 through 20 as if fully set forth herein.
22. Defendants owed a duty to exercise reasonable care in the operation of its facilities and in its interactions with the public.
23. Defendants breached that duty by engaging in the acts and omissions described above.
24. As a direct and proximate result of the Defendants negligence, Plaintiffs suffered physical harm, emotional and psychological trauma, and other related damages.
25. Plaintiff continues to suffer from the lasting effects of this incident and has incurred and may continue to incur costs related to medical care and counseling.

WHEREFORE, Plaintiff demands judgment for damages against all the Defendants, Florida Department of Highway Safety and Motor Vehicles, Miami-Dade County Tax Collector, and the Broward County Tax Collector, in the amount of \$10,000,000, plus costs, interest, and any other relief this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

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By: /s/ Michael A. Pizzi, Jr.
MICHAEL A. PIZZI, JR., ESQ.