

**IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

DISTRICT OF COLUMBIA,
a municipal corporation,
441 4th Street, N.W.
Washington, D.C. 20001,

Plaintiff,

v.

WILLIAM H. HARRISON
8401 Owens Way
Brandywine, MD 20613,

and

CASSANDRA V. HARRISON
8401 Owens Way
Brandywine, MD 20613,

Defendants.

Case No.: _____

JURY TRIAL DEMANDED

FALSE CLAIMS ACT COMPLAINT AND JURY DEMAND

The District of Columbia, by its Office of the Attorney General, brings this action against Defendants William H. Harrison and Cassandra V. Harrison under D.C. Code § 2-381.02(a) and the common law, and alleges as follows:

Jurisdiction

1. This Court has subject matter jurisdiction over this case under D.C. Code § 11-921 and § 2-381.02(a).
2. This Court has personal jurisdiction over Defendants under D.C. Code § 13-423(a)(1) and (3).

Parties

3. The District of Columbia (District), a municipal corporation empowered to sue and be sued, is the local government for the territory constituting the permanent seat of the government of the United States. The District is represented by and through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General has general charge and conduct of all legal business of the District and all suits initiated by and against the District and is responsible for upholding the public interest. D.C. Code §§ 1-301.81(a)(1), 2-381.03. The Attorney General is specifically authorized to enforce the District's False Claims Act, pursuant to D.C. Code § 2-381.03(a).

4. Defendants William H. Harrison and Cassandra V. Harrison are married individuals residing at 8401 Owens Way, Brandywine, Maryland 20613. Defendant William Harrison is employed as a contractor for the United States Department of Agriculture.

Defendants' Children

5. Defendants have a daughter, O.H., who attended The Duke Ellington School of the Arts (Duke Ellington), a District of Columbia Public Schools (DCPS) school, for the entirety of the 2012-2013 and 2013-2014 school years.

6. Defendants have another daughter, C.H., who attended Duke Ellington for the entirety of the 2016-2017 school year and a portion of the 2017-2018 school year.

7. Defendants have a son, G.H., who attended Hyde-Addison Elementary School (Hyde-Addison ES), a DCPS school, for the entirety of the 2014-2015 and 2015-2016 school years. G.H. attended Hardy Middle School (Hardy MS), a DCPS school, for the entirety of the 2016-2017 school year. Defendants enrolled G.H. as a student at McKinley Middle School (McKinley MS), a DCPS school, for the 2017-2018 school year, but G.H. instead attended public school in Maryland at Gwynn Park High School, a Prince George's County Public Schools school, for the entirety of the 2017-2018 school year.

8. Defendants have a fourth child, O.S.H., who attended public schools in Prince George's County as a resident of Maryland from at least 2006 to her graduation in 2018.

9. At all times relevant to the acts described in this Complaint, Defendants and their children—O.H., C.H., G.H., and O.S.H.—were residents of Maryland.

District of Columbia False Claims Act

10. The District of Columbia Procurement Reform Amendment Act (the District's False Claims Act) provides for the award of treble damages and civil penalties for, *inter alia*, knowingly making or causing to be made or used false statements to conceal, avoid, or decrease an obligation to pay money to the District. D.C. Code § 2-381.02(a) (2011 Supp.).

11. The District's False Claims Act was amended in 2013 by the Medicaid Enforcement and Recovery Amendment Act of 2012 (2013 Amendments). 59 D.C.

Reg. 13,632-41 (2012). The 2013 Amendments became effective on March 19, 2013.
60 D.C. Reg. 9261 (2013).

12. The pre-2013 version of the District’s False Claims Act provided:

(a) Any person who commits any of the following acts shall be liable to the District for 3 times the amount of damages which the District sustains because of the act of that person. A person who commits any of the following acts shall also be liable to the District for the costs of a civil action brought to recover penalties or damages, and may be liable to the District for a civil penalty of not less than \$5,000, and not more than \$10,000, for each false claim for which the person:

* * *

(7) Knowingly makes or uses, or causes to be made or used, a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the District

D.C. Code § 2-381.02 (2011 Supp.).

13. The pre-2013 version of the District’s False Claims Act defines “[k]nowing” or “knowingly” to mean “[t]hat a person, with respect to information, does any of the following: (i) Has actual knowledge of the falsity of the information; (ii) Acts in deliberate ignorance of the truth or falsity of the information; or (iii) Acts in reckless disregard of the truth or falsity of the information.” D.C. Code § 2-381.01(3)(A) (2011 Supp.). Proof of specific intent to defraud is not required for an act to be knowing. D.C. Code § 2-381.01(3)(B) (2011 Supp.).

14. Effective March 19, 2013, the District’s False Claims Act was amended to provide that:

(a) Any person who commits any of the following acts shall be liable to the District for 3 times the amount of damages which the District sustains because of the act of that person. A person who commits any of the following acts shall also be liable to the District for the costs of a

civil action brought to recover penalties or damages, and may be liable to the District for a civil penalty of not less than \$5,500, and not more than \$11,000, for each false claim for which the person:

* * *

(1) Knowingly presents, or causes to be presented, a false or fraudulent claim for payment or approval;

* * *

(6) Knowingly makes, uses, or causes to be made or used, a false record or statement material to an obligation to pay or transmit money or property to the District, or knowingly conceals or knowingly and improperly avoids or decreases an obligation to pay or transmit money or property to the District

D.C. Code § 2-381.02 (2013).

15. The District’s False Claims Act, as amended, defines “[k]nowing” or “knowingly” to mean “[t]hat a person, with respect to information, does any of the following: (i) Has actual knowledge of the information; (ii) Acts in deliberate ignorance of the truth or falsity of the information; or (iii) Acts in reckless disregard of the truth or falsity of the information.” D.C. Code § 2-381.01(7)(A) (2013). Proof of specific intent to defraud is not required for an act to be knowing. D.C. Code § 2-381.01(7)(B) (2013).

16. The District’s False Claims Act defines “[m]aterial” to mean “having a natural tendency to influence, or be capable of influencing, the payment or receipt of money or property.” D.C. Code § 2-381.01(8) (2013).

17. The District’s False Claims Act defines “obligation” to mean “an established duty, whether or not fixed, arising from . . . statute or regulation, or from the retention of any overpayment.” D.C. Code § 2-381.01(9) (2013).

Nonresident Tuition

18. D.C. Code § 38-302(a)(2) requires that nonresident tuition be paid for each student who attends a District public school and does not have a parent, guardian, custodian, or other primary caregiver who resides in the District. *See also* D.C. Code § 38-1800.02(25); 5-A D.C.M.R. §§ 5001.5, 5099.1. Nonresident tuition rates are set by the District’s Office of the State Superintendent of Education to “cover all expenses” incurred by District schools in educating the student. D.C. Code § 38-302(b).

19. D.C. Code § 38-301(11) defines “parent” as “a natural parent, stepparent, or parent by adoption who has custody or control of a student, including joint custody.”

20. Nonresidents are required to pay tuition to enroll nonresident children in District public schools because public funds are appropriated to the schools for the sole purpose of educating the children and youth of District residents. D.C. Code § 38-2902.

District of Columbia’s Supplemental Nutrition Assistance Program (SNAP)

21. In 1964, Congress established the Food Stamp Act of 1964, commonly known as the food stamp program. In 2008, Congress passed the Food, Conservation, and Energy Act of 2008, Pub. L. 110-246, 122 Stat. 1651, to rename the food stamp program as the Supplemental Nutrition Assistance Program (SNAP). SNAP provides nutritional food-purchasing assistance for low and no-income households. 7 C.F.R. § 271.1(a). Administration of the SNAP program is delegated to state and local

governments. 7 C.F.R. § 271.4. The District established its SNAP program through the Food Stamp Expansion Act of 2009. D.C. Code §§ 4-261.01 *et seq.*

22. To be eligible to receive SNAP benefits, a household “shall live in the State in which it files an application for participation.” 7 CFR § 273.3(a). Accordingly, recipients of SNAP benefits from the District must live in the District.

**Defendant Cassandra Harrison’s False Statements to a
DCPS School (2012-2013 School Year)**

23. On July 23, 2012, Defendant Cassandra Harrison submitted an Enrollment Form to DCPS to enroll O.H. as a student at Duke Ellington for the 2012-2013 school year.

24. On the Enrollment Form, Defendant Cassandra Harrison stated that she and O.H. resided at 2330 Q Street, S.E., Washington, D.C. 20020. Defendant Cassandra Harrison listed Defendant William Harrison’s address as 8401 Owens Way, Brandywine, Maryland 20613. Under the “Residency Status” section of the Enrollment Form, Defendant Cassandra Harrison checked the box next to “D.C. Resident (Student and parent or legal guardian live in D.C.),” indicating that she and O.H. were District residents. Under the “Housing Status” section, Defendant Cassandra Harrison checked the box next to “Permanent.” Defendant Cassandra Harrison signed the Enrollment Form, certifying that she completed the form, that the information on the form was accurate, and that she understood that “providing false information for purposes of defrauding the government is punishable by law.”

25. Relying on the Enrollment Form Defendant Cassandra Harrison submitted to DCPS, Duke Ellington enrolled O.H. as a student for the 2012-2013 school year. O.H. was enrolled as a District resident.

26. Defendant Cassandra Harrison knew the information she provided on the Enrollment Form was incorrect because, when she signed and submitted the form, she knew that O.H. was living with her and Defendant William Harrison in Brandywine, Maryland and not at the District address she stated on the form.

**Defendant Cassandra Harrison's False Statements to a
DCPS School (2013-2014 School Year)**

27. On August 5, 2013, Defendant Cassandra Harrison submitted an Enrollment Form to DCPS to enroll O.H. as a student at Duke Ellington for the 2013-2014 school year.

28. On the Enrollment Form, Defendant Cassandra Harrison stated that she and O.H. resided at 2330 Q Street, S.E., Washington, D.C. 20020. Defendant Cassandra Harrison listed Defendant William Harrison's address as 8401 Owens Way, Brandywine, Maryland 20613. Under the "Residency Status" section of the Enrollment Form, Defendant Cassandra Harrison checked the box next to "D.C. Resident (Student and parent or legal guardian live in D.C.)," indicating that she and O.H. were District residents. Under the "Housing Status" section, Defendant Cassandra Harrison checked the box next to "Permanent." Defendant Cassandra Harrison signed the Enrollment Form, certifying that she completed the form, that the information on the form was accurate, and that she understood that "providing false information for purposes of defrauding the government is punishable by law."

29. On August 5, 2013, Defendant Cassandra Harrison signed and submitted a sworn statement of D.C. residency to DCPS, affirming that she resided in the District.

30. Relying on the Enrollment Form and sworn statement of D.C. residency Defendant Cassandra Harrison submitted to DCPS, Duke Ellington enrolled O.H. as a student for the 2013-2014 school year. O.H. was enrolled as a District resident.

31. Defendant Cassandra Harrison knew the information she provided on the Enrollment Form was incorrect, and that her sworn statement of D.C. residency was false, because, when she signed and submitted the forms, she knew that O.H. was living with her and Defendant William Harrison in Brandywine, Maryland and not at the District address she stated on the forms.

**Defendant Cassandra Harrison's False Statements to a
DCPS School (2014-2015 School Year)**

32. On May 1, 2014, Defendant Cassandra Harrison submitted an Enrollment Form to DCPS to enroll G.H. as a student at Hyde-Addison ES for the 2014-2015 school year.

33. On the Enrollment Form, Defendant Cassandra Harrison stated that she and G.H. resided at 2330 Q Street, S.E., Washington, D.C. 20020. Under the "Residency Status" section of the Enrollment Form, Defendant Cassandra Harrison checked the box next to "D.C. Resident (Student and parent or legal guardian live in D.C.)," indicating that she and G.H. were District residents. Defendant Cassandra Harrison signed the Enrollment Form, certifying that she completed the form, that

the information on the form was accurate, and that she understood that “providing false information for purposes of defrauding the government is punishable by law.”

34. Relying on the Enrollment Form Defendant Cassandra Harrison submitted to DCPS, Hyde-Addison ES enrolled G.H. as a student for the 2014-2015 school year. G.H. was enrolled as a District resident.

35. Defendant Cassandra Harrison knew the information she provided on the Enrollment Form was incorrect because, when she signed and submitted the form, she knew that G.H. was living with her and Defendant William Harrison in Brandywine, Maryland and not at the District address she stated on the form.

**Defendant Cassandra Harrison’s False Statements to a
DCPS School (2015-2016 School Year)**

36. On April 24, 2015, Defendant Cassandra Harrison submitted an Enrollment Form to DCPS to enroll G.H. as a student at Hyde-Addison ES for the 2015-2016 school year.

37. On the Enrollment Form, Defendant Cassandra Harrison stated that she and G.H. resided at 2330 Q Street, S.E., Washington, D.C. 20020. Defendant Cassandra Harrison listed Defendant William Harrison’s address as 8401 Owens Way, Brandywine, Maryland 20613. Under the “Housing Status” section, Defendant Cassandra Harrison checked the box next to “Permanent,” indicating that she and G.H. were permanent District residents. Defendant Cassandra Harrison signed the Enrollment Form, certifying that she completed the form, that the information on the form was accurate, and that she understood that “providing false information for purposes of defrauding the government is punishable by law.”

38. On April 25, 2015, Defendant Cassandra Harrison signed and submitted a sworn statement of D.C. residency, affirming that she resided in the District.

39. Relying on the Enrollment Form and sworn statement of D.C. residency Defendant Cassandra Harrison submitted to DCPS, Hyde-Addison ES enrolled G.H. as a student for the 2015-2016 school year. G.H. was enrolled as a District resident.

40. Defendant Cassandra Harrison knew the information she provided on the Enrollment Form was incorrect, and that her sworn statement of D.C. residency was false, because when she signed and submitted the forms, she knew that G.H. was living with her and Defendant William Harrison in Brandywine, Maryland and not at the District address she stated on the forms.

**Defendant Cassandra Harrison's False Statements to
DCPS Schools (2016-2017 School Year)**

41. On April 22, 2016, Defendant Cassandra Harrison submitted an Enrollment Form to DCPS to enroll C.H. as a student at Duke Ellington for the 2016-2017 school year.

42. On the Enrollment Form, Defendant Cassandra Harrison stated that she and C.H. resided at 2330 Q Street, S.E., Washington, D.C. 20020. Defendant Cassandra Harrison listed Defendant William Harrison's address as 8401 Owens Way, Brandywine, Maryland 20613. Defendant Cassandra Harrison signed the Enrollment Form, certifying that she completed the form, that the information on the form was accurate, and that she understood that "providing false information for purposes of defrauding the government is punishable by law."

43. On April 22, 2016, Defendant Cassandra Harrison signed and submitted a sworn statement of D.C. residency, affirming that she resided in the District.

44. Relying on the Enrollment Form and sworn statement of D.C. residency Defendant Cassandra Harrison submitted to DCPS, Duke Ellington enrolled C.H. as a student for the 2016-2017 school year. C.H. was enrolled as a District resident.

45. On August 2, 2016, Defendant Cassandra Harrison submitted an Enrollment Form to DCPS to enroll G.H. as a student at Hardy MS for the 2016-2017 school year.

46. On the Enrollment Form, Defendant Cassandra Harrison stated that she and G.H. resided at 2330 Q Street, S.E., Washington, D.C. 20020. Defendant Cassandra Harrison listed Defendant William Harrison's address as 8401 Owens Way, Brandywine, Maryland 20613. Under the "Housing Status" section, Defendant Cassandra Harrison checked the box next to "Permanent," indicating that she and G.H. were permanent District residents. Defendant Cassandra Harrison signed the Enrollment Form, certifying that she completed the form, that the information on the form was accurate, and that she understood that "providing false information for purposes of defrauding the government is punishable by law."

47. On August 2, 2016, Defendant Cassandra Harrison signed and submitted a sworn statement of D.C. residency, affirming that she resided in the District.

48. Relying on the Enrollment Form and sworn statement of D.C. residency Defendant Cassandra Harrison submitted to DCPS, Hardy MS enrolled G.H. as a student for the 2016-2017 school year. G.H. was enrolled as a District resident.

49. Defendant Cassandra Harrison knew the information she provided on the Enrollment Forms was incorrect, and that her sworn statement of D.C. residency was false, because, when she signed and submitted the forms, she knew that C.H. and G.H. were living with her and Defendant William Harrison in Brandywine, Maryland and not at the District address she stated on the forms.

**Defendants' False Statements to
DCPS Schools (2017-2018 School Year)**

50. On June 30, 2017, Defendant Cassandra Harrison submitted an Enrollment Form to DCPS to enroll C.H. as a student at Duke Ellington for the 2017-2018 school year.

51. On the Enrollment Form, Defendant Cassandra Harrison stated that she and C.H. resided at 2330 Q Street, S.E., Washington, D.C. 20020. Defendant Cassandra Harrison listed Defendant William Harrison's address as 8401 Owens Way, Brandywine, Maryland 20613. Defendant Cassandra Harrison signed the Enrollment Form, certifying that she completed the form, that the information on the form was accurate, and that she understood that "providing false information for purposes of defrauding the government is punishable by law."

52. On June 30, 2017, Defendant Cassandra Harrison signed and submitted a sworn statement of D.C. residency, affirming that she resided in the District.

53. On September 22, 2017, Defendant William Harrison submitted a second Enrollment Form to DCPS to enroll C.H. as a student at Duke Ellington for the 2017-2018 school year.

54. On this Enrollment Form, Defendant William Harrison stated that he and C.H. resided at 168 Uhland Terrace, N.E., Washington, D.C. 20002. Defendant William Harrison signed the Enrollment Form, certifying that he completed the form, that the information on the form was accurate, and that he understood that “providing false information for purposes of defrauding the government is punishable by law.”

55. On September 22, 2017, Defendant William Harrison signed and submitted a sworn statement of D.C. residency, affirming that he resided in the District.

56. Relying on the Enrollment Forms and sworn statements of D.C. residency Defendants submitted to DCPS, Duke Ellington enrolled C.H. as a student for the 2017-2018 school year. C.H. was enrolled as a District resident.

57. C.H. attended Duke Ellington as a District resident until October 17, 2017. C.H. was enrolled as a Maryland resident at Gwynn Park High School, a public school in Prince George’s County, Maryland, for the remainder of the 2017-2018 school year.

58. On September 28, 2017, Defendant William Harrison submitted an Enrollment Form to DCPS to enroll G.H. as a student at McKinley MS for the 2017-2018 school year.

59. On the Enrollment Form, Defendant William Harrison stated that he and G.H. resided at 168 Uhland Terrace, N.E., Washington, D.C. 20002. Under the “Housing Status” section, Defendant William Harrison checked the box next to “Permanent,” indicating that he and G.H. were permanent District residents. Defendant William Harrison signed the Enrollment Form, certifying that he completed the form, that the information on the form was accurate, and that he understood that “providing false information for purposes of defrauding the government is punishable by law.”

60. On September 28, 2017, Defendant William Harrison signed and submitted a sworn statement of D.C. residency, affirming that he resided in the District. As proof of residency, Defendant William Harrison consented to a home visitation by DCPS. After conducting a home visitation, DCPS was unable to confirm that G.H. resided at 168 Uhland Terrace, N.E., Washington, D.C. 20002, and G.H. was not permitted to enroll as a resident student at McKinley MS. Defendants enrolled G.H. as a Maryland resident at Gwynn Park High School, a public school in Prince George’s County, Maryland, for the 2017-2018 school year.

61. Defendants knew the information they provided on the Enrollment Forms was incorrect, and that their sworn statements of D.C. residency were false because, when they signed and submitted the forms, they knew that C.H. and G.H. were living with them in Brandywine, Maryland and not at either of the District addresses they stated on the forms.

**Defendants' Knowing Avoidance of an
Obligation to Pay District Nonresident Tuition**

62. Defendant William Harrison, a resident of Maryland, knew he was obligated to pay nonresident tuition for his children to attend District public schools because he knew that he, his children, and Defendant Cassandra Harrison resided in Maryland, and not in the District. During the entire time period that O.H., C.H., and G.H. attended school in the District, Defendant William Harrison resided, and continues to reside, in Brandywine, Maryland.

63. Defendant William Harrison knew that, by failing to notify DCPS that he, Defendant Cassandra Harrison, and their children were Maryland residents, he improperly avoided his obligation to pay nonresident tuition to the District.

64. Defendant Cassandra Harrison, a resident of Maryland, knew she was obligated to pay nonresident tuition for her children to attend District public schools because she knew that she, her children, and Defendant William Harrison resided in Maryland, and not in the District. During the time period that Defendants sought to enroll G.H. at McKinley MS as a District resident, Defendant Cassandra Harrison resided, and continues to reside, in Brandywine, Maryland.

65. Defendant Cassandra Harrison knew that, by failing to notify DCPS that she, Defendant William Harrison, and their children were Maryland residents, she improperly avoided her obligation to pay nonresident tuition to the District.

**Defendants' Failure to Pay Nonresident Tuition Owed
to District Public Schools**

66. Nonresident tuition for O.H. to attend a DCPS school for the 2012-2013 and 2013-2014 school years totals \$21,379.00.

67. Nonresident tuition for C.H. to attend a DCPS school for the 2016-2017 school year and a portion of the 2017-2018 school year totals \$14,386.04.

68. Nonresident tuition for G.H. to attend DCPS schools for the 2014-2015, 2015-2016, and 2016-2017 school years totals \$29,440.56.

69. To date, Defendants have not paid any of the nonresident tuition they owe to the District for O.H., C.H., and G.H.'s attendance at DCPS schools, nor have any tuition payments been made on their behalf.

**Defendant Cassandra Harrison's Receipt of SNAP Benefits
from the District**

70. On June 26, 2014, Defendant Cassandra Harrison submitted a Combined Application for D.C. Medical Assistance, Food Stamps, and Cash Assistance to the District's Department of Human Services (DHS) to apply for food stamps for herself and her four children, O.H., O.S.H., C.H., and G.H. On the form, Defendant Cassandra Harrison stated that she lived at 2330 Q Street, S.E., Washington, D.C. 20020. Defendant Cassandra Harrison signed the form, certifying that, "I believe that all of my information on this entire six-page form is correct. I know that if I give any false information, I may be breaking the law."

71. In June 2014, Defendant Cassandra Harrison began receiving SNAP benefits for herself and her four children—O.H., O.S.H., C.H., and G.H.—from the District.

72. On or about November 12, 2014, Defendant Cassandra Harrison signed and submitted a Food Stamp Mid-Certification Report to continue receiving SNAP benefits. On the form, which asked about changes to her household since her initial application, Defendant Cassandra Harrison stated that no one moved into or out of the home she had listed on her application form. By signing the form, Defendant Cassandra Harrison certified that “I know that if I give any false information, I may be breaking the law.” Based on this form, DHS approved Defendant Cassandra Harrison to continue receiving SNAP benefits.

73. On or about May 13, 2015, Defendant Cassandra Harrison signed and submitted a Recertification Form to continue receiving SNAP benefits. On this form, Defendant Cassandra Harrison stated that she lived at 2330 Q Street, S.E., Washington, D.C. 20020. Defendant Cassandra Harrison also checked the box next to “No” in response to the question “Does anyone in your household own real property . . . OTHER THAN the home that you live in?” Defendant Cassandra Harrison signed the form, declaring under penalty of perjury that, “All the information I have given is true, accurate, and complete to the best of my knowledge” and “I understand that if I give any false, incorrect, or incomplete information, I may be breaking the law and I could be prosecuted.” Based on this form, DHS approved Defendant Cassandra Harrison’s recertification for SNAP benefits.

74. On May 15, 2015, Defendant Cassandra Harrison filled out a Food Stamp (SNAP) Change Report. On the form, Defendant Cassandra Harrison stated that O.S.H. and C.H. moved out of her household on June 20, 2015.

75. On or about October 29, 2015, Defendant Cassandra Harrison signed and submitted a Food Stamp Mid-Certification Report to continue receiving SNAP benefits. On the form, which asked about changes to her household since her last certification, Defendant Cassandra Harrison stated that no one moved into or out of the home she had listed on her application form. By signing the form, Defendant Cassandra Harrison certified that “I know that if I give any false information, I may be breaking the law.” Based on this form, DHS approved Defendant Cassandra Harrison to continue receiving SNAP benefits.

76. May 5, 2016, Defendant Cassandra Harrison submitted a Combined Application for D.C. Medical Assistance, Food Stamps, and Cash Assistance to DHS to apply for food stamps for herself and her four children, O.H., O.S.H., C.H., and G.H. On the form, Defendant Cassandra Harrison stated that she lived at 2330 Q Street, S.E., Washington, D.C. 20020. Defendant Cassandra Harrison signed the form, certifying that, “I believe that all of my information on this entire six-page form is correct. I know that if I give any false information, I may be breaking the law.” Based on this form, DHS approved Defendant Cassandra Harrison to continue receiving SNAP benefits.

77. Defendant Cassandra Harrison received SNAP benefits from the District from June 2014 through September 2016, during which time she and her children lived in Brandywine, Maryland, and not in the District.

78. From June 2014 through September 2016, Defendant Cassandra Harrison received SNAP benefits from the District in the amount of \$20,879.00.

79. To date, Defendant Cassandra Harrison has not reimbursed the District for any of the SNAP benefits she accepted while she was a resident of the Maryland, nor have any payments been made on her behalf.

COUNT I
False Claims Act
Knowingly Making a False Record or Statement
to Conceal, Avoid, or Decrease an Obligation to Pay the District
(D.C. Code § 2-381.02(a)(7) (2011 Supp.))

80. Paragraphs 1 through 79 are realleged as if fully set forth herein.

81. Defendant Cassandra Harrison knowingly made a false statement to conceal, avoid, or decrease an obligation to pay the District when she signed and submitted false enrollment documents for her child O.H., causing District public schools to decline to charge nonresident tuition for O.H.'s attendance at a DCPS school during the 2012-2013 school year in violation of D.C. Code § 2-381.02(a)(7) (2011 Supp.). Defendant Cassandra Harrison knew that she did not reside in the District when she made this false statement.

COUNT II
False Claims Act
Knowingly Making a False Record or Statement
Material to an Obligation to Pay the District and Knowingly
Concealing and Knowingly and Improperly Avoiding or
Decreasing an Obligation to Pay the District
(D.C. Code § 2-381.02(a)(6) (2013))

82. Paragraphs 1 through 79 are realleged as if fully set forth herein.

83. Defendant Cassandra Harrison knowingly made, used, or caused to be made or used, false records or statements material to an obligation to pay the District. Defendant Cassandra Harrison knowingly signed and submitted false enrollment documents for her three children—O.H., C.H., and G.H.—causing District public schools to decline to charge nonresident tuition for her children’s attendance at DCPS schools for the 2013-2014, 2014-2015, 2015-2016, and 2016-2017 school years, and for a portion of the 2017-2018 school year, in violation of D.C. Code § 2-381.02(a)(6).

84. Defendant William Harrison knowingly made, used, or caused to be made or used, false records or statements material to an obligation to pay the District. Defendant William Harrison knowingly signed and submitted false enrollment documents for two of his children, C.H. and G.H, causing District public schools to decline to charge nonresident tuition for C.H.’s attendance at a DCPS school for a portion of the 2017-2018 school year in violation of D.C. Code § 2-381.02(a)(6).

85. Defendant William Harrison knowingly concealed and knowingly and improperly avoided or decreased an obligation to pay the District. Defendant William Harrison knew that he had an obligation to pay nonresident tuition for his three children—O.H., C.H., and G.H.—because he, Defendant Cassandra Harrison, and

their children did not reside in the District. Defendant William Harrison failed to notify the District of his, Defendant Cassandra Harrison's, and their children's correct address, causing District public schools to decline to charge nonresident tuition for his three children's attendance at DCPS schools during the 2013-2014, 2014-2015, 2015-2016, and 2016-2017 school years, and for a portion of the 2017-2018 school year, in violation of D.C. Code § 2-381.02(a)(6).

86. Defendant Cassandra Harrison knowingly concealed and knowingly and improperly avoided or decreased an obligation to pay the District. Defendant Cassandra Harrison knew that she had an obligation to pay nonresident tuition for her three children—O.H., C.H., and G.H.—because she, her children, and Defendant William Harrison did not reside in the District. Defendant Cassandra Harrison failed to notify the District of her, Defendant William Harrison's, and G.H.'s correct address in order to enroll G.H. at McKinley MS as a District resident for the 2017-2018 school year in violation of D.C. Code § 2-381.02(a)(6).

COUNT III
False Claims Act
Knowingly Presenting a False or Fraudulent Claim for Approval
(D.C. Code § 2-381.02(a)(1) (2013))

87. Paragraphs 1 through 79 are realleged as if fully set forth herein.

88. Defendant Cassandra Harrison knowingly presented a false claim for payment or approval to the District. Defendant Cassandra Harrison knowingly submitted false information when she applied for SNAP benefits, causing DHS to provide SNAP benefits to her despite the fact that she did not live in the District, in violation of D.C. Code § 2-381.02(a)(1).

COUNT IV
Unjust Enrichment

89. Paragraphs 1 through 79 are realleged as if fully set forth herein.

90. By having their children—O.H., C.H., and G.H.—attend DCPS schools for the 2012-2013, 2013-2014, 2014-2015, 2015-2016, and 2016-2017 school years, and for a portion of the 2017-2018 school year, and by avoiding their obligation to pay nonresident tuition to the District despite their residency in Maryland, Defendants have been unjustly enriched to the detriment of the District.

COUNT V
Unjust Enrichment

91. Paragraphs 1 through 79 are realleged as if fully set forth herein.

92. By accepting SNAP benefits from the District despite living in Maryland and not in the District, Defendant Cassandra Harrison has been unjustly enriched to the detriment of the District.

Prayer for Relief

WHEREFORE, the District respectfully requests that judgment be entered in its favor and against Defendants on its claims, and that this Court impose damages and penalties as follows:

- (1) On Count I against Defendant Cassandra V. Harrison, awarding the District treble statutory damages in an amount to be determined at trial, but not less than \$31,752.00 (three times \$10,584.00), and civil penalties of not less than \$5,000.00 and not more than \$10,000.00,

payable to the District, for each violation of the District's False Claims Act, D.C. Code § 2-381.02(a)(7) (2011 Supp.); and

- (2) On Count II against Defendants, awarding the District treble statutory damages in an amount to be determined at trial, but not less than \$163,864.80 (three times \$54,621.60), and civil penalties of not less than \$5,500.00 and not more than \$11,000.00, payable to the District, for each violation of the District's False Claims Act, D.C. Code § 2-381.02(a)(6) (2013); and
- (3) On Count III against Defendant Cassandra V. Harrison, awarding the District treble statutory damages in an amount to be determined at trial, but not less than \$62,637.00 (three times \$20,879.00); civil penalties of not less than \$5,500.00 and not more than \$11,000.00, payable to the District, for each violation of the District's False Claims Act, D.C. Code § 2-381.02(a)(1) (2013); and
- (4) On Count IV against Defendants, awarding the District actual damages in an amount to be determined at trial, but not less than \$65,205.60; and
- (5) On Count V against Defendant Cassandra V. Harrison, awarding the District actual damages in an amount to be determined at trial, but not less than \$20,879.00; and
- (6) Awarding the District interest, costs, and other recoverable expenses permitted by law; and

(7) Awarding the District such other relief as may be just and proper.

Jury Demand

The District of Columbia hereby demands a trial by jury by the maximum number of jurors permitted by law.

Date: November 20, 2018

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

ROBYN R. BENDER
Deputy Attorney General, Public Advocacy Division

/s/ Catherine A. Jackson
CATHERINE A. JACKSON
Chief, Public Integrity Section
D.C. Bar #1005415

/s/ Jessica M. Micciolo
JESSICA M. MICCIOLO
Assistant Attorney General
D.C. Bar #1049090
Suite 630 South
441 4th Street, N.W.
Washington, D.C. 20001
(202) 741-0762
(202) 730-1896 (fax)
jessica.micciolo@dc.gov

Attorneys for the District of Columbia