

**IN THE CIRCUIT COURT FOR THE SIXTH JUDICIAL CIRCUIT  
OF FLORIDA IN AND FOR PINELLAS COUNTY**

B

STATE OF FLORIDA

VS.

**FELONY INFORMATION**

<b>ISSUE CAPIAS</b>
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**JORDAN PIERCE HIDALGO**  
PID 310316370  
W/M; DOB: 08/05/84

CONTRACTOR FRAUD - MONEYS  
RECEIVED BY CONTRACTORS, 3<sup>rd</sup>

IN THE NAME AND BY THE AUTHORITY FOR THE STATE OF FLORIDA:

BRUCE BARTLETT, State Attorney for the Sixth Judicial Circuit of Florida, in and for Pinellas County, prosecuting for the State of Florida, in the said County, under oath, Information makes that

JORDAN PIERCE HIDALGO

in the County of Pinellas and State of Florida, on or between the 1st day of May 2022 and the 31st day of December, in the year of our Lord, two thousand twenty-three, did receive money for repair, restoration, addition, improvement, or construction of the residential real property of Patrick Dosh, in excess of the work performed and failed or refused to perform any work for a 90-day period or for any period that was mutually agreed upon, and the total money received exceeded the value of the work performed is \$1,000 or more, but less than \$20,000; contrary to Chapter 489.126(3), Florida Statutes, and against the peace and dignity of the State of Florida.

STATE OF FLORIDA  
PINELLAS COUNTY

Personally appeared before me, BRUCE BARTLETT, State Attorney for the Sixth Judicial Circuit of Florida, in and for Pinellas County, or his duly designated Assistant State Attorney, who being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which if true, would constitute the offense therein charged; hence this information is filed in good faith in instituting this prosecution, and that he has received testimony under oath from the material witness or witnesses for the offense.

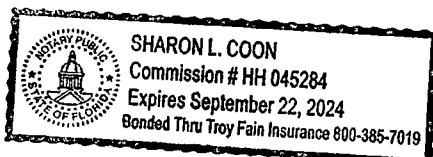
The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization this

by T.D. Koskinas AUG 15 2024 who is personally known to me and who did take an oath.

*[Signature]*  
Assistant State Attorney for the Sixth  
Judicial Circuit of the State of Florida,  
Prosecuting for said State

NOTARY PUBLIC

CP23-000148 NAF24-01362-B CF-SFM/0717ad19



IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT OF THE STATE OF  
FLORIDA IN AND FOR PINELLAS COUNTY

STATE OF FLORIDA

V.

JORDAN PIERCE HIDALGO  
W/M; DOB: 8/5/1984

WITNESS AFFIDAVIT

BEFORE ME, A NOTARY PUBLIC, personally appeared Julie Longen, an investigator with Pinellas County Consumer Protection (hereinafter "PCCP"), who being duly sworn says:

Your Affiant is a Criminal Investigator with PCCP. Your Affiant has been an investigator with PCCP since approximately December 2019. Your Affiant is a Certified Fraud Examiner and has experience investigating various crimes including theft and unlicensed contracting.

Your Affiant investigated a consumer fraud complaint filed by the complainant P.D. against suspect JORDAN PIERCE HIDALGO. JORDAN PIERCE HIDALGO is alleged to have committed Contractor Fraud - Moneys Received By Contractors for work HE contracted to do at P.D.'s residence located in Belleair, Pinellas County, Florida 33771.

As part of the investigation, your Affiant conducted interviews and reviewed records. During the interview of P.D., your Affiant learned the following information:

In May 2022, P.D. wanted to have a swimming pool installed. He entered into an agreement with Modern Pools who provided an estimate of \$138,325 for the pool, a new seawall, and an outdoor kitchen. Your Affiant reviewed this estimate and observed that the cost listed for the seawall was \$38,700 and the cost for the outdoor kitchen was listed as \$13,900. On 5/14/2022, P.D. paid a deposit of \$27,665 with the expectation that the project would get started right away and be finished by Thanksgiving. Later on, the City of Belleair building department did not approve the installation of the outdoor kitchen. Your Affiant learned that the seawall portion of the project started first and it was not finished until the end of December 2022. Modern Pools broke

ground on the pool excavation on 1/16/2023 and work continued until 2/8/2023.

P.D. originally dealt with Larry "Butch" Brown with Modern Pools, who passed away on 2/26/2023. P.D. then dealt with Modern Pools employee Benjamin Harriman. P.D. did not have contact with JORDAN PIERCE HIDALGO other than sending a certified letter to HIM on 5/18/2023, which will be described below.

Your Affiant learned from PD that he made payments to Modern Pools according to the draw schedule listed on the agreement, as noted by the chart below:

date	amount	method	payee
5/14/2022	\$ 27,665	check	Modern Pools
12/22/2022	\$ 28,000	wire	Modern Pools
1/19/2023	\$ 40,000	check	Modern Pools
1/23/2023	\$ 19,860	check	Modern Pools
2/8/2023	\$ 30,345	check	Modern Pools
<b>\$ 145,870</b>			

Your Affiant also learned from P.D. that after P.D. made his last payment to Modern Pools on 2/8/2023, no worker from Modern Pools came to his home to do any work on his pool installation. Up to that point, Modern Pools poured the concrete shell and installed partial piping. Modern Pools did not prepare and finish the concrete shell. It also did not install the tile, travertine decking, salt cell, and window alarms. Below is a chart representing the items listed above where the work was not performed by Modern Pools. Your Affiant learned of the cost of each item from the contract provided to P.D. by Modern Pools.

Item cost	description	Status
\$ 1,500	salt cell	Not completed
\$ 15,180	travertine decking	Not completed
\$ 379	window alarms	Not completed
<b>\$ 17,059</b>		

Upon reviewing records provided by P.D. to your Affiant, your Affiant learned that on 5/18/2023, P.D. sent a certified letter Modern Pools at 9445 Ulmerton Rd., Largo, FL 33771. Your Affiant observed that this is the address listed in the

contract. P.D.'s letter was sent pursuant to Florida Statute 489.126, and it demanded a refund from Modern Pools of funds received in excess of the value of the work performed. The letter was returned to P.D., with a listing of "Unclaimed" on 11/8/2023. Your Affiant learned from P.D. that JORDAN PIERCE HIDALGO never provided a refund.

Your Affiant also reviewed certified records received from the Florida Department of Business and Professional Regulation through a formal request and those records reflect that JORDAN PIERCE HIDALGO was a contractor holding the following licenses: State Commercial Pool/Spa Contractor License #CPC1458569. The records further reflect that JORDAN PIERCE HIDALGO qualified The Pool Consultants, LLC, dba Modern Pools. It should also be noted that on 10/24/2023, the State of Florida Construction Industry Licensing Board, Department of Business and Professional Regulation filed Case 2023-08365 against JORDAN PIERCE HIDALGO, which included a Final Order Approving Settlement Agreement. The order listed fifty-three Cases against JORDAN PIERCE HIDALGO's nine licenses (CBC1260956, CBC1260338, CGC1529876, CPC1458569, CPC1458865, CPC1459143, CPC1459487, CPC1459718, CPC1459968). In this case, JORDAN PIERCE HIDALGO agreed to voluntarily relinquish HIS licenses effective September 2023 and never apply for licensure as a contractor or financially responsible officer in the State of Florida.

Your Affiant also reviewed records received from JP Morgan Chase Bank in response to a subpoena request. During this review, your Affiant learned that the five payments charted above totaling \$145,870 from P.D were deposited into the business account for Modern Pools. Your Affiant also learned that JORDAN PIERCE HIDALGO was listed as an Authorized Representative on the account.

Your Affiant also reviewed publicly available records from the Florida Department of State, Division of Corporations. During this review, your Affiant learned that the Fictitious Name "Modern Pools" was registered by JORDAN PIERCE HIDALGO on 4/15/2019. The registration information listing the owner as The Pool Consultants, LLC, with a mailing address of 801 West Bay Dr, Suite 454, Largo, FL 33770. Your Affiant also learned that The Pool Consultants, LLC, was incorporated on 6/2/2014 by JORDAN PIERCE HIDALGO with the sole Authorized person listed as JORDAN PIERCE HIDALGO.

Your Affiant also conducted a telephone interview of JORDAN PIERCE HIDALGO on 5/9/2024. During the interview, JORDAN PIERCE HIDALGO stated that regarding the complaints filed against HIM, that HE had closed HIS business and thought that all of this was behind HIM as it had been so long. JORDAN PIERCE HIDALGO asked to be provided copies of the complaints, which were sent to HIM via email that day.

Based on the foregoing, your Affiant has developed probable cause that JORDAN PIERCE HIDALGO committed the following offense and respectfully requests that a capias be issued for JORDAN PIERCE HIDALGO for this offense so that HE may be made to answer to the charge:

1. Moneys Received By Contractor, 3<sup>rd</sup> F, value \$1,000 - \$20,000, contrary to Chapter 489.126(3) Florida Statutes

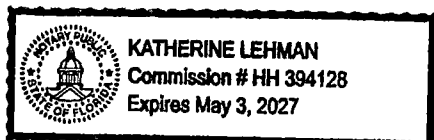
The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization this 2 day of August, 2024 by Julie Longen, who is personally known to me or has produced \_\_\_\_\_ as identification and who did take an oath.

Katherine Lehman

NOTARY PUBLIC

County Court or Circuit Court -  
Criminal Division, Pinellas County, Florida

Notary Public



Julie Longen  
AFFIANT

14250 49<sup>th</sup> St N Suite 1000 Rm 2  
Clearwater, FL 33762

AFFIANT'S ADDRESS

727-464-7994

AFFIANT'S TELEPHONE NUMBER

NAF24-01362

FINDING OF PROBABLE CAUSE

I, Keith Meyer have reviewed this affidavit  
and do find there is probable cause to hold and bind over for trial  
the defendant named in this affidavit.

Clerk of this Court is hereby directed to  
ISSUE CAPIAS for arrest of Defendant

JORDAN PIERCE HIDALGO

Defendant is to be admitted to Bail in the sum of  
\$ 5,000.00 on Ct. 1, including surcharge

\$ 5,000.00 Total.

Other conditions of release: \_\_\_\_\_

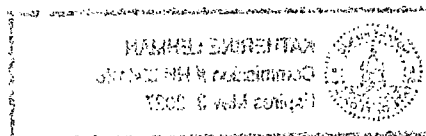
None

Advisory Judge ☐ may ☐ may not modify bail at first  
appearance.

[Signature]  
Circuit/County Judge

[Signature]  
JUDGE

8/20/24  
DATE



## PERSONAL DATA INFORMATION SHEET

ALL INFORMATION MUST BE PROVIDED BY THE INVESTIGATING OFFICER I

\*Note: Starred lines are required for computer warrant entries. \*FCIC System (local) \*\*NCIC System

\* Defendant's Full Name **Jordan Pierce HIDALGO**

\* Alias:

\* SSN: [REDACTED]

\* SID #:

Last Known Address 213 Garden Circle, Belleair FL 33756

Place of Employment:

Address: 9445 Ulmerton Rd, Largo FL 33771

\*DOB: 8/5/1984

\*SEX: M

\*RACE: W

FINGERPRINTS  
AVAILABLE:

YES ☐

NO  
☐

\*\*HT:

\*\*WT:

\*\*HAIR:

EYES:

OTHER FEATURES: (BEARD, MARKS, SCARS, TATTOOS)

Per FL Cr Rule 3.121 attach photo - SOPICS preferred!  
Originating Source of PHOTO:

☐ SOPICS Docket #

☐ FL DL #

☐ SOPICS Photo confirmed accurate by:  
Julie Longen, Investigator

☐ Other State DL # State

☐ Other Photo Source #

☒ NO PHOTO AVAILABLE — Explanation For No Photo: Investigator agency  
does not have access to DAVID photos

\*AGENCY: Pinellas County Consumer Protection

OFFENSE NUMBER: CP-CRM- 23-00216

\*INVESTIGATING OFFICER: Julie Longen