

Florida Department of Law Enforcement

I am requesting an investigation be opened into a possible criminal enterprise to defraud homeowners of their real estate, laundering money and organized fraud by creating false assessments to increase the reserves for a developer in exchange for high real estate contracts. Deliberately deceiving owners by violating Florida state statutes on failure to disclose board members on corporation documents for non-for-profit organizations. Regarding the Amethyst condominium Association, Inc. located at 5313 Collins Avenue Miami Beach, Florida 33140. Mast Capitol AKA: 5313 Collins acquisitions and the city of Miami beach.

On or about 2019 Mast Capitol AKA: 5333 Collins Acquisitions began to offer contracts and bought out condos at an adjacent building LaCosta located at 5333 Collins Avenue. When unit owners refused to settle on real estate contracts with the developer Miami Beach quickly came in and coincidentally produced an engineering report determining the building was unsafe. The residents were given 30 days to vacate as the building was condemned. Residents that were holding out were ordered to come to an agreement with the developer by a judge. Shortly after 5313 Collins Acquisitions LLC. was formed and started to offer real estate contracts at the Amethyst condominium 5313 Collins Avenue Miami Beach, Florida 33140. The building then immediately went under large concrete restoration construction. A Permit application was obtained by Luis Naya of Naya Architects. Exhibit 1A Mr. Naya is also a unit owner of Unit 811 Exhibit 1 B at the amethyst and the board's President of the Association. He represented himself as the architect on record for the building to clear several life-threatening violations in the past. A permit not reflecting the entire work being performed on the building was obtained by Architect Luis Naya. The scope of work on the building went far beyond what was listed in the permit. Balconies torn down and restored without engineering reports, foundation columns and beams taken down to the bare minimum and only cosmetically restored. Exhibit 1C The city of Miami beach, despite several complaints, turned a blind eye to the work being conducted despite serious violations issued which appeared to be leading to a building shut down timed with the developers purchasing our units Several emails were sent to the city concerning the safety of our building. Interest rates for loans increased and the developer held off on closing of units. An email received from Ana Salgueiro on September 5th Director of the City of Miami beach building department revealed the building violations were serious enough to require an engineering report identifying water intrusion to close violations and that the city did not ignore the issues. The next day, on September 6th after violations were opened for close to three years everything was immediately cleared dismissing the required engineering report, stating she received a letter from the architect. An architect Luis Naya who is a unit owner, President of the Association and sat in closed door meetings with the developer. Exhibit 1 D.

Previously a new board of Directors for the Amethyst was elected and assigned in June of 2022 at which time they created a false budget for Mast capitol the developer in exchange for high real estate contracts. Please refer to Budget review July 18, 2022 which lists the Board of Directors Onix Padron President, Ron Speelman Vice President, Noelia Grossi Treasure who created a false budget Exhibit A 1 meeting minutes Exhibit A 2, No where does this board appear on Sunbiz documents as ever being in

existence see Exhibit A 3 and A 4. which resulted in a false assessment Exhibit B 1 an assessment over a million dollars where not one of the assessments over a year was used for its intended purposes. The roof was never replaced, no bids produced, insurance policy denied for review by unit owners. The board also refused to release engineering reports and owners' ledgers on the building forcing a current arbitration filing. It is unthinkable after the Surfside building collapse that board members with obvious criminal intent would fail to provide engineering reports to unit owners. The assessment was only implemented after the board's first attempt in concealing insurance claims to its units' owners from Hurricane Irma. Exhibit D 1 and D 1 A An attempt to leave the claims to the developer in exchange for high contracts. The board also refused to release insurance information. The insurance special assessment included an insurance assessment of \$480,000 when the Budget already accounted for \$360,000. A letter was sent requesting the insurance information on the building Exhibit C 1 and the Association attorney refused to provide the insurance documents see Exhibit C 2. There is a separate official request for review that was sent as well. The association's attorney is aware these documents were not provided to me as a unit owner as a demand letter for preservation of evidence was sent Exhibit C 3 and resulted in a current pending arbitration. Part of the right to inspect documents were aged owner balance reports that would show the Board and a certain group were not paying for their maintenance or assessments, beefing up the reserves from others for the developer in exchange for high real estate contracts. Upon receiving notice of arbitration to obtain documents the board immediately terminated Miami Management to destroy unit collection reports and engineering reports on the building.

Several residents complained openly of the boards continued contact with the developer not allowing residents to be present in meetings, the destruction of our building and why they are refusing to provide engineering reports to residents to assure that the building was safe. At an HOA meeting on video, the board was confronted on why they are refusing to account for their leadership roles by documenting their positions on Sunbiz corporation documents as required by law. Taking over bank accounts, creating budgets, assigning contracts, and giving documented bonuses to other company's employees. They blamed the management company that was not present at the meeting.

By ignoring Florida non-for-profit statute 617 failing to disclose board members for non-for-profit organizations Mr. Ronnie Bronstein the Associations attorney listed as the registered agent went against his own protocol by not properly listing the board on Florida corporation documents even after demand letters were sent. Exhibit D 1, D 1 A , D 2 the board and association attorney continued to ignore this request . In exchange he continued to bill and receive funds beefing up his fees with a board that is nonexistent on Sunbiz and had no authority to make decisions until they were properly documented. This also allowed board members not listed to meet with developers behind closed doors Exhibit E1. Create a memo of understanding involving 28 members called the Canero group. On September 15th at a community meeting a new board was assigned by the current board who was resigning. Luis Naya and Robert Bollinger were assigned as the new board see minutes under Exhibit E3. A treasure by the name Isela Monteagudo was later appointed. Her appointment was never done at any board meeting nor does any minutes of any meeting reflect her being assigned as treasure. A civil case filing claiming this memo of understanding was signed at a community meeting on or about September 22,2022. Exhibit E2 There was never a community meeting where this memo was presented. This filing is a fraud this was never presented at any community meeting. See minutes from September 15th and 30th Exhibit E 3 E 4. This Canero group does not represent most of the association; however, high real estate contracts were

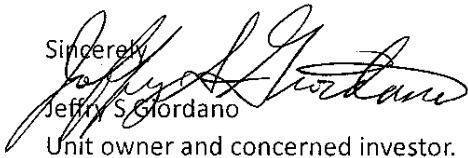
provided at the meeting where other owners were not allowed to attend. The association's attorney also attempted to keep this memo of understanding secret Exhibit D 1. This memo was later fraudulently altered and used in a civil action filing placing a document with me and my wife's signature along with other unit owners attached to the bottom of the memo of understanding. The memo was placed on top of signatures to amend the Bylaws however the board makes it appear that we were signing with acknowledgement of the memo of understanding. Please see Miami Dade civil case involving the Amethyst condominium association and 5313 Collins Acquisitions local Dade County Case number. 2023-019570-CA-01 Refer to document attachments. Regarding this fraudulent filing a demand Email letter was sent Exhibit F 1. With concealing the boards' identity, the President of the Board Onix Padron actively promoted the sale of commercial units in the building to allow the developer to get a strong hold of the building. Exhibit F 2 and F 3. The association attorney also promoted the sale at the meeting congratulating its members making false claims that they will receive \$10,000. There was no quorum at the meeting, however the vote was approved, and votes failed to be counted in front of the members. The President at the time Onix a few months after her resignation filed a false claim and apparently was settled for a large sum of money without reporting this to the insurance company by the board she appointed. Exhibit F 4.

The Association attorney Mr. Bronstein clearly was aware of Bribery and extortion taking place as he documented it in his invoice 22876 Exhibit G line 5. (RB) referring to board member Robert Bollinger. The current civil action filed against the developer, using its members money civil local case 2023-019570-CA-01 is a smoke screen as they are in bed with the developer only to delay closings because of current interest rate increases and further allowing the board to increase the reserves for the developer through false assessments. Imagine the treasure on a board of three using its members' money on legal fees, a move that most of its members were against. Having an attorney file an injunction, only favoring the Canero group of 28. (The injunction has not been approved by a judge yet). Exhibit I, A board member working with an attorney requesting an injunction to close all the units at once instead of peacemaking purchases Exhibit J from Injunction pg. However, the treasure Isela is demanding they close on her unit attempting to extort the developer through threats and intimidation. Exhibit K The treasure also attempts to highlight a member from the group of 28, The Canero group in sending an email that his real estate contract is illegal. A group she herself is a member of. Under Exhibit L.

As an investor and owner of Miami Dade county real estate and a former law enforcement officer it hurts me to see elderly residents in our building being defrauded of their life savings with false assessments of a board beefing up the reserves for a developer in exchange for board members receiving high real estate contracts. With the assistance of the Miami Dade State attorney's office and the Florida department of law enforcement I am confident these kangaroo board members can be brought to justice and a message sent to board members throughout the county that corruption in our HOA associations will not be tolerated.

I truly believe that that following criminal state statutes may have been violated: 812.014 Theft, 817.03 Making false statements to obtain property, 817.15 False statements in books of business entities, Fraudulent practices under chapter 817, 895.01 Florida RICO (Racketeer influenced and corrupt organization), 896.101 Florida money laundering Act along with civil statutes 501.201 Florida deceptive and unfair trade practices, 517.011 Florida securities and investor protection act. Your immediate attention to this matter would be greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey S. Giordano". The signature is fluid and cursive, written over the printed name.

Jeffrey S. Giordano

Unit owner and concerned investor.

305-710-5222

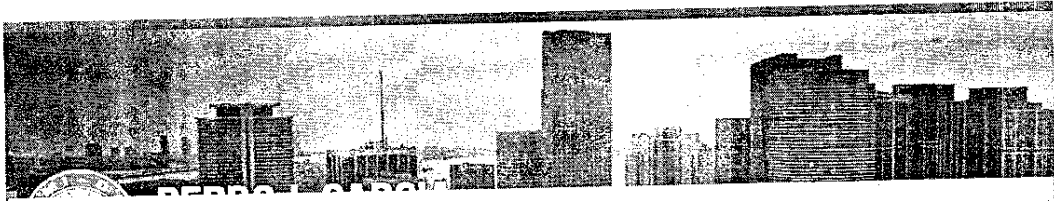
Exhibit 1A

MIAMI BEACH BUILDING DEPARTMENT Reviewed For Compliance

Permit Application

Applicant Information (Blue or Black Ink, Only)		BC2116519
Office Use Only Submital Date: _____ Permit #: _____	Parcel / Folio Number: 02-3214-022-001	Building Department 1700 Convention Center Drive, 2 nd Floor Miami Beach, Florida 33139 Telephone: 305- 673-7610; Fax: 305-673-7857 http://www.miamibeachfl.gov/building/
Property Address: 5313 collins ave, miami beach, FL, 33140	Unit #:	Master Permit Number (If applicable):
		Violation # (If applicable):
Permit Type (select one)		
<input checked="" type="checkbox"/> Building <input type="checkbox"/> Electrical <input type="checkbox"/> Mechanical <input type="checkbox"/> Plumbing <input type="checkbox"/> Roofing <input type="checkbox"/> Phased Permit <input type="checkbox"/> Demo year built <input type="checkbox"/> Generator <input type="checkbox"/> Temporary Structure <input type="checkbox"/> Fire <input type="checkbox"/> Shop Drawings		
Permit Request (select all that apply)		
<input checked="" type="checkbox"/> New Permit <input type="checkbox"/> Change of Contractor <input type="checkbox"/> Change of Architect/Engineer <input type="checkbox"/> LEED <input type="checkbox"/> Interior, Non-Structural <input type="checkbox"/> 5 Days Review <input type="checkbox"/> Permit Extension <input type="checkbox"/> Permit Renewal <input type="checkbox"/> Permit Revision <input type="checkbox"/> Change of Use <input type="checkbox"/> Private Provider <input type="checkbox"/> City Project <input type="checkbox"/> Reprive Permit		
Property Information (select one)		
<input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Multi-Family Residential <input type="checkbox"/> Residential: Single-Family Residential or Duplex Occupancy Classification: _____ Total Value of Work: \$ _____ <small>Attach a copy of the construction cost affidavit to _____</small>		
New Construction/Addition		Alteration/Reconfiguration of Space
Total Value: \$11,000	Square Footage: Value of Work: \$	63sf \$10,000
Description of Work: unit 411 concrete repairs all around window, unit 210 concrete and stucco repair, unit 211 concrete and stucco repair.		
Property Owner		Contractor
Name: The Amethyst Condominium Association		Name: Juan C. Clavijo
Address: 5313 collins Ave		Address: 12205 sw 128 ct
City: Miami beach		City: Miami
State: FL		State: fl
Zip Code: 33140		Zip Code: 33186
Driver's License/ State Identification Number:		State Identification Number/License: CGC 1513648
E-Mail Address: nagarcia@miamimanagement.com		E-Mail Address: Lgonzalez@icongroupengineers.com
Daytime phone: 8am-5pm		Daytime phone: 8am -5pm
Architect		Structural Engineer
Name: Luis Naya		Name: N/A
License Number:		License Number: N/A
E-Mail Address: naya@nayaarchitects.com		E-Mail Address: N/A
Daytime phone: 8am-5pm		Daytime phone: N/A
Notice & Certification		
<p>This application is hereby made to obtain a permit to do the work and installations as indicated. I certify that all work will be performed to meet the standards of all laws and construction regulations in this jurisdiction. I understand that a separate permit must be secured for Electrical, Elevator, Fire, Mechanical, Plumbing, Signs, Wells, Pools, Furnaces, Boilers, Heaters, Tanks, Air Conditioners, etc.</p> <p>Owner's Affidavit: I certify that all the foregoing information is correct. Owner Certifies that the aforementioned Contractor has the authorization to perform the work as specified above.</p> <p>Lessee's Affidavit: Lessee certifies that he has full consent and authorization from owner of subject property to perform the above-mentioned work and to hire above captioned contractor.</p> <p>In addition to the requirements of this permit, there may be additional restrictions applicable to this property that may be found in the public records of this county, and there may be additional permits required from other governmental entities such as: the Environmental Division of Miami-Dade County; Permitting, Environment and Regulatory Affairs, Water & Sewer Department, Department of Environmental Protection, South Florida Water Management District, Miami-Dade County Impact Fee, water management districts, state agencies, and/or federal agencies.</p> <p>With the execution of this permit, the contractor shall be held responsible for all work done on the subject property. Any information found to be false or misleading in this permit or other documents of this permit shall constitute a crime under the laws of the State of Florida and the contractor shall be held liable for the same.</p>		
<p>OWNER'S AND QUALIFIER'S ELECTRONIC SUBMISSION STATEMENT: Under penalties of perjury, I declare that I have read the information contained in this permit application and the facts stated in it are true and correct.</p> <p><input type="checkbox"/> Owner/Lessee for new permits (Documentation establishing ownership may be requested). <input type="checkbox"/> REGISTERED PROFESSIONAL ENGINEER PACKAGE MUST BE SUBMITTED TWO (2) WEEKS IN ADVANCE.</p> <p><input type="checkbox"/> Master Permit Contractor of Record (For sub-permit / change of contractor).</p>		
<p>WARNING TO OWNER: YOUR FAILURE TO RECORD A NOTICE OF COMMENCEMENT MAY RESULT IN YOUR PAYING TWICE FOR IMPROVEMENTS TO YOUR PROPERTY. A NOTICE OF COMMENCEMENT IS REQUIRED FOR ANY WORK WITH COST EXCEEDING \$2,500.00.</p>		
Signature of Owner/Agent or GC (for Sub-permits): <i>[Signature]</i> PRINT NAME: Isela Montenegro STATE OF FLORIDA COUNTY OF Dade		Signature of Qualifier: <i>[Signature]</i> PRINT NAME: Juan Clavijo STATE OF Florida COUNTY OF Dade
The foregoing instrument was acknowledged before me, by means of <input type="checkbox"/> physical presence or <input type="checkbox"/> online notarization, this 14 day of May , 20 21 by <i>[Signature]</i> Signature of Notary Public		The foregoing instrument was acknowledged before me, by means of <input type="checkbox"/> physical presence or <input type="checkbox"/> online notarization, this 14 day of May , 20 21 by <i>[Signature]</i> Signature of Notary Public
Print Name: AIDA M. LEIBE (SEAL) MY COMMISSION # GG 925872 Personally known EXPIRES: February 24, 2024 or Produced Identification Bonded Thru Notary Public Underwriters		Print Name: JOSE MARIA LOPEZ (SEAL) Notary Public - State of Florida Personally known Commission # GG 172067 or Produced Identification Notary Public - State of Florida Bonded through National Notary Association

Exhibit 1B



HOME EXEMPTIONS & OTHER REAL ESTATE TANGIBLE PERSONAL PROPERTY PUBLIC RECORDS ONLINE TOOLS TAX ROLL ADMINISTRATION ABOUT CONTACT US US

ADDRESS OWNER NAME SUBDIVISION NAME FOLIO

SEARCH: Owner Name luis naya

[Back to Search Results](#)



Folio: 02-3214-022-1070

Sub-Division:
THE AMETHYST CONDO

Property Address
5313 COLLINS AVE UNIT: 811

Owner
LUIS E NAYA

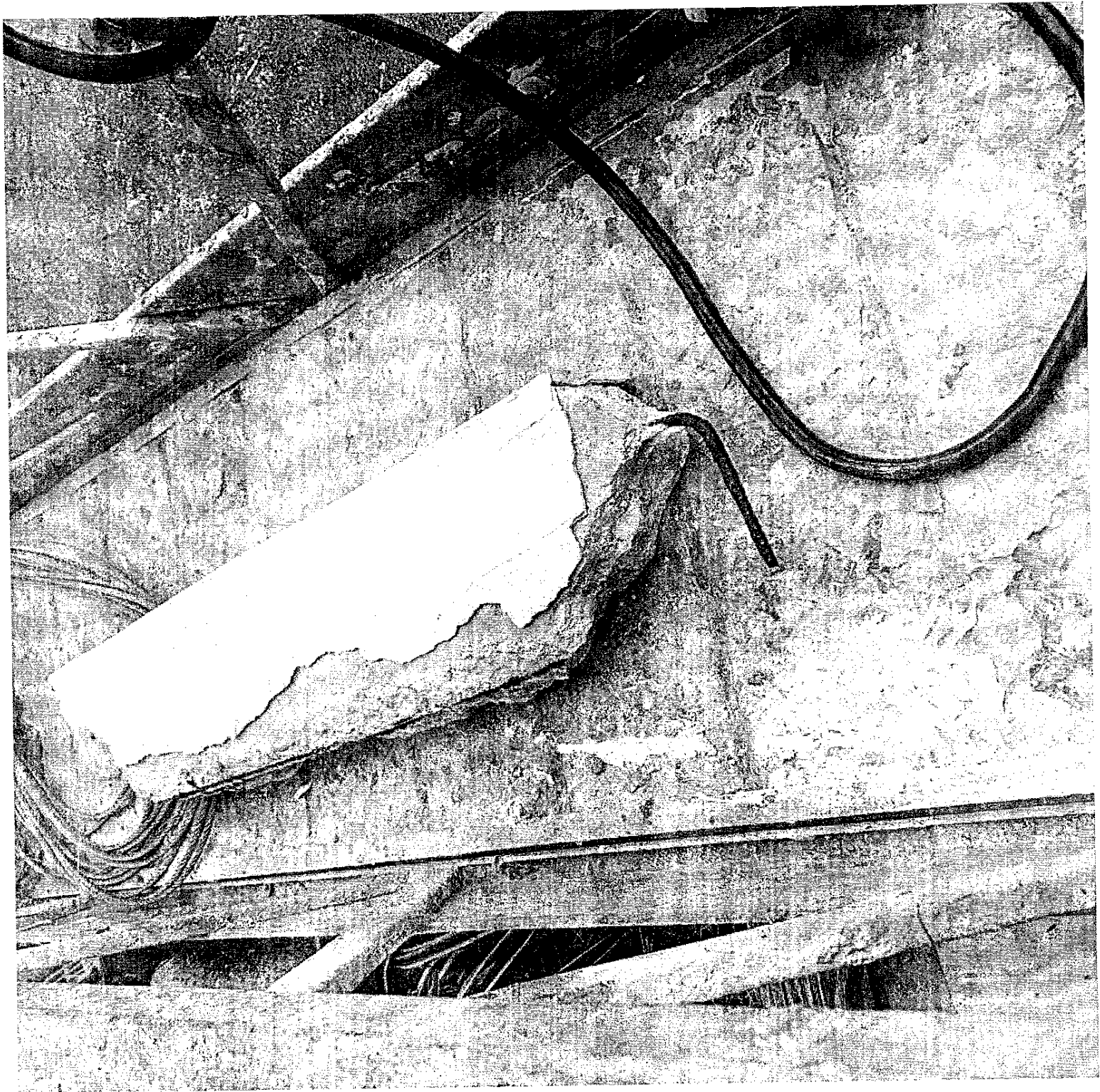
Mailing Address
2828 CORAL WAY STE 480
MIAMI, FL 33145

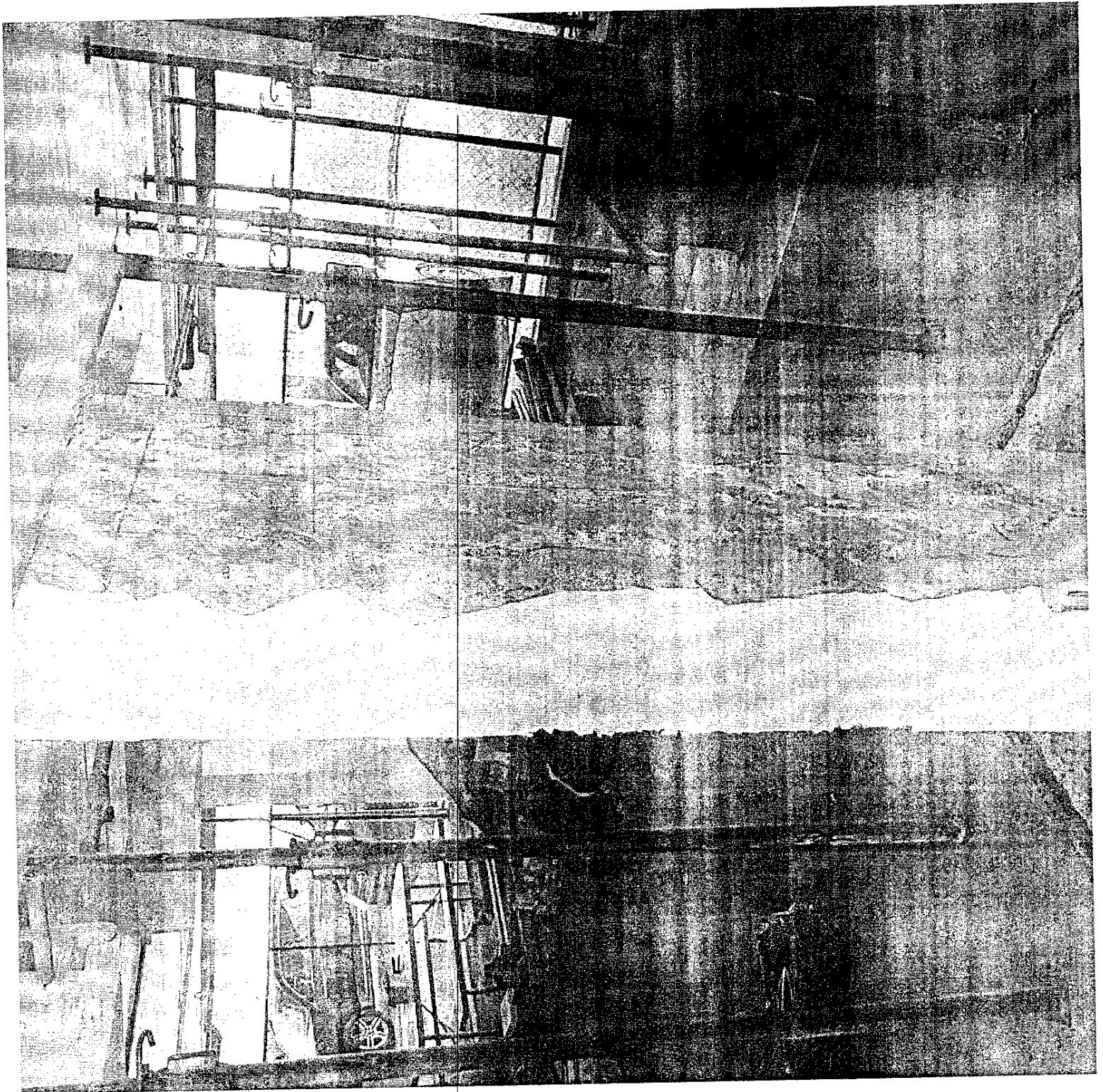
PA Primary Zone
4100 MULTI-FAMILY - 101+ U/A

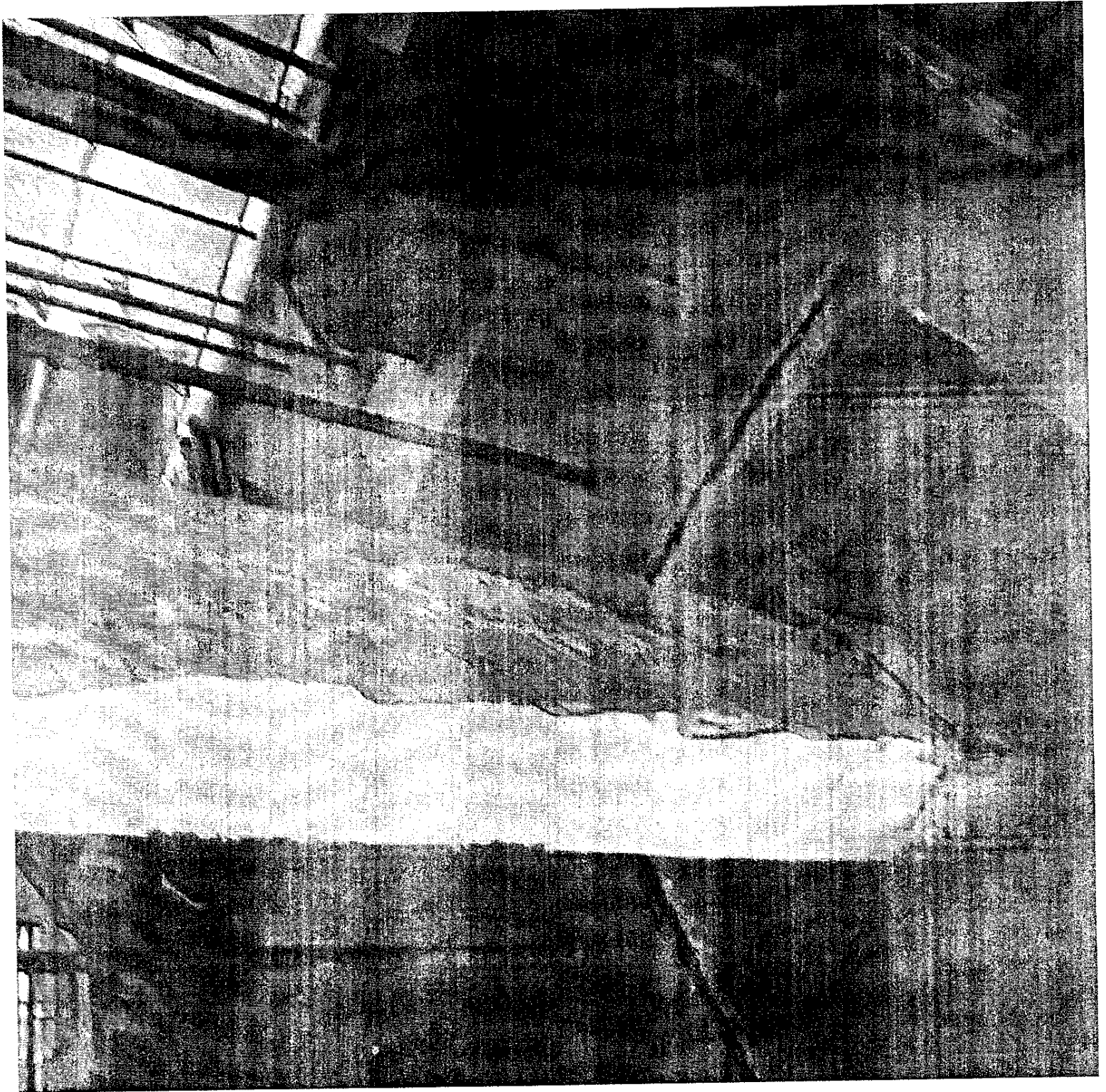
Primary Land Use
0407 RESIDENTIAL - TOTAL VALUE : CONDOMINIUM - RESIDENTIAL

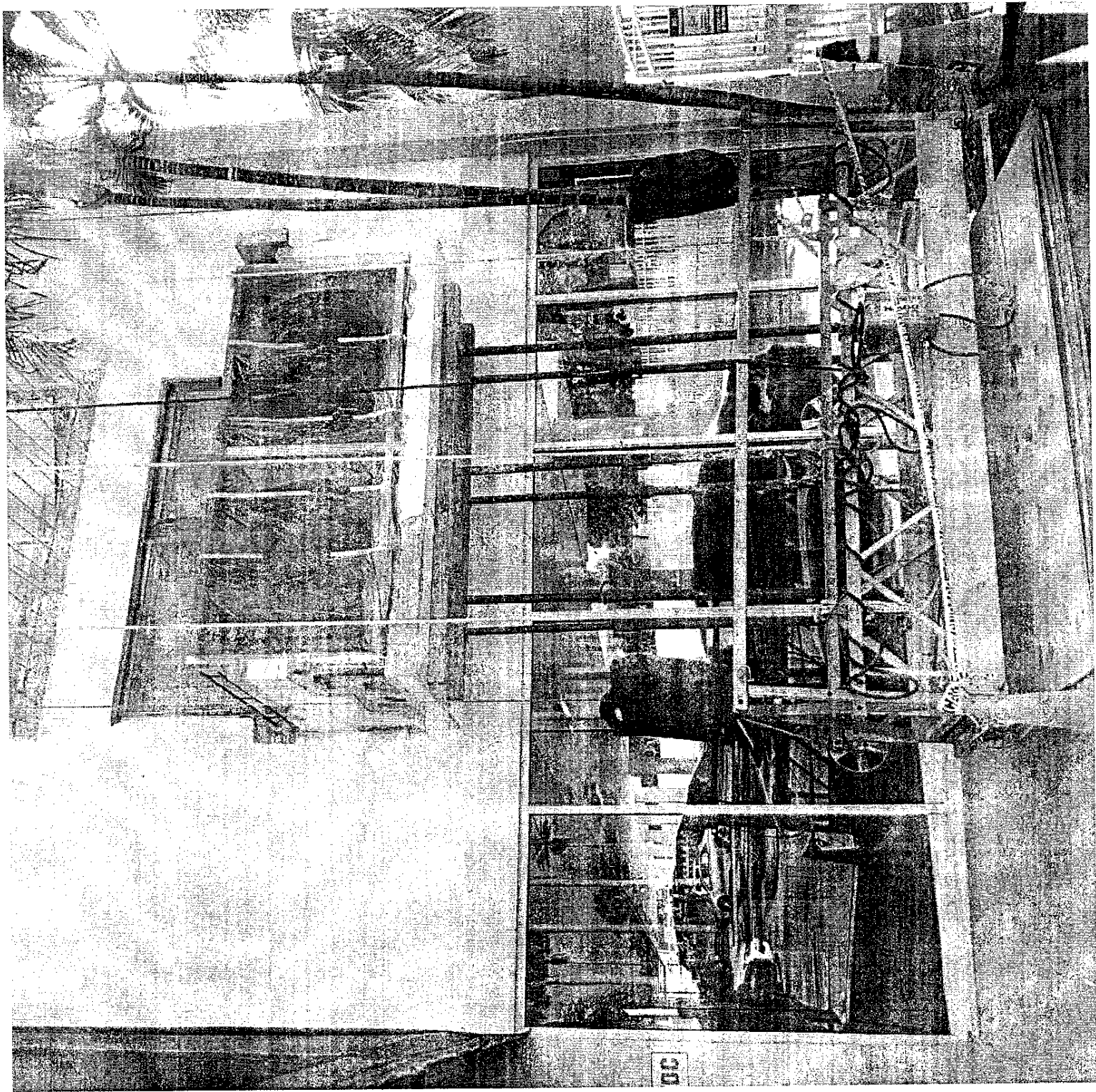
Beds / Baths /Half	1 / 1 / 1
Floors	0
Living Units	1
Actual Area	
Living Area	790 Sq.Ft
Adjusted Area	790 Sq.Ft
Lot Size	0 Sq.Ft
Year Built	1964

Exhibit 1C











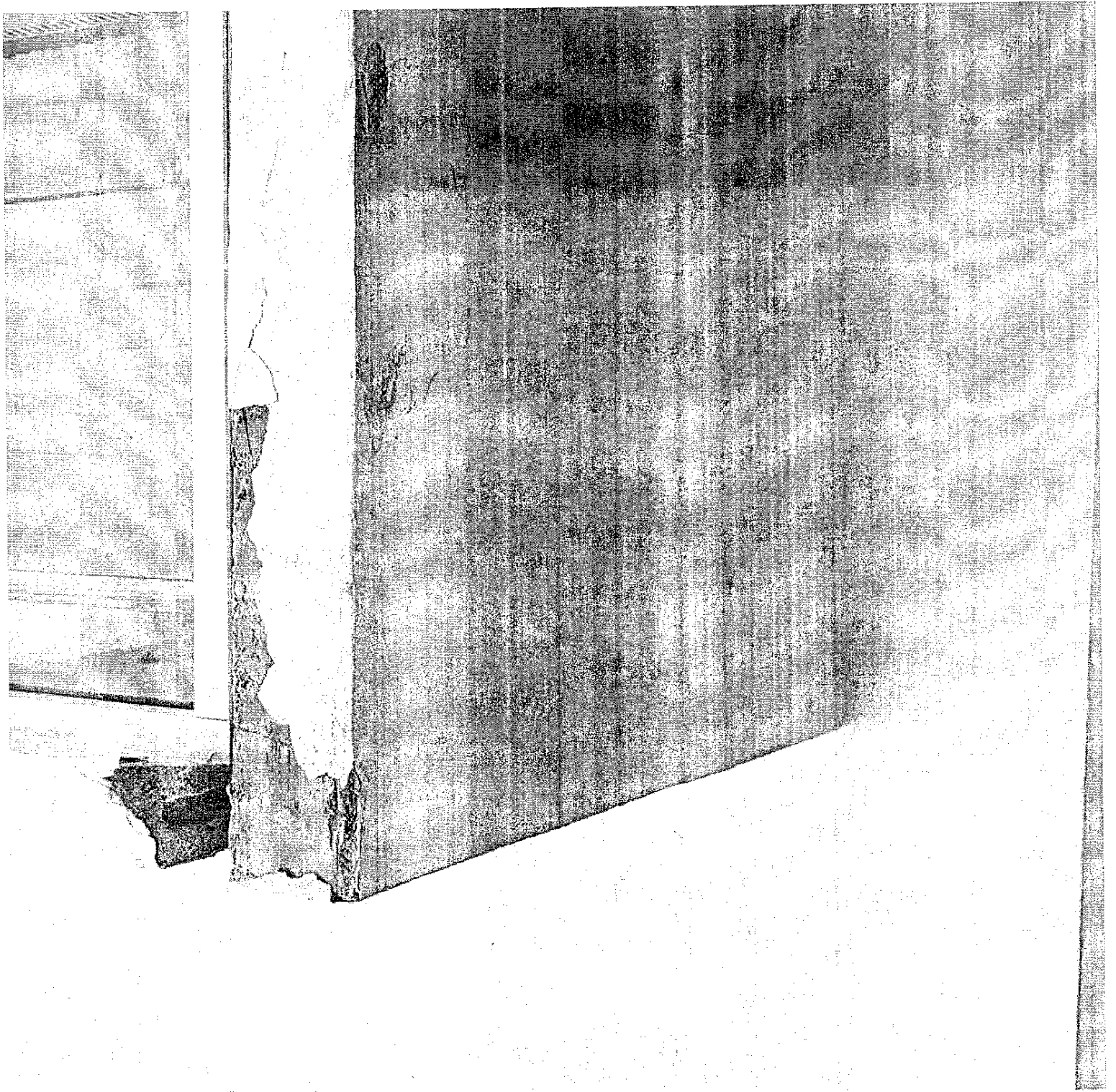


Exhibit 1D

RE: The Amethyst Condominium 5313 Collins Avenue

Salgueiro, Ana <AnaSalgueiro@miamibeachfl.gov>

Wed 9/6/2023 9:09 AM

To: Jeffrey Giordano <jgiordano@gpssecurity.us>; Rothstein, Steven <StevenRothstein@miamibeachfl.gov>; Singh, Narinder <Narindersingh@miamibeachfl.gov>; Alvarez, Ibrahim <IbrahimAlvarez@miamibeachfl.gov>; Rosen Gonzalez, Kristen <Kristen@miamibeachfl.gov>; Dominguez, Laura <Laura@miamibeachfl.gov>
Cc: Naya@nayaarchitects.com <Naya@nayaarchitects.com>; ISELA MONTEAGUDO <IHM23@msn.com>; Robert Bollinger <rbollinger61@yahoo.com>

Good morning Jeffery,

The architect and engineer which were copied on this email provided the letters of final inspections and the record of payment of fees and fines to our violations team which were also included on your e-mail. I provided the open violations records as well as the record of pending inspections.

Our team also went to the property last week to verify the field conditions. You were instrumental in getting the information to all of the parties.

Regards,
Ana

MIAMI BEACH

Ana M. Salgueiro, P.E.,

Director, Building Official
BUILDING DEPARTMENT
1700 Convention Center Drive, Miami Beach, FL 33139
Tel: 305-673-7610 ext 26587

AnaSalgueiro@miamibeachfl.gov

We are committed to providing excellent public service and safety to all who live, work and play in our vibrant, tropical, historic community

From: Jeffrey Giordano <jgiordano@gpssecurity.us>

Sent: Tuesday, September 5, 2023 5:19 PM

To: Salgueiro, Ana <AnaSalgueiro@miamibeachfl.gov>; Rothstein, Steven <StevenRothstein@miamibeachfl.gov>; Singh, Narinder <Narindersingh@miamibeachfl.gov>; Alvarez, Ibrahim <IbrahimAlvarez@miamibeachfl.gov>; Rosen Gonzalez, Kristen <Kristen@miamibeachfl.gov>; Dominguez, Laura <Laura@miamibeachfl.gov>
Cc: Naya@nayaarchitects.com; ISELA MONTEAGUDO <IHM23@msn.com>; Robert Bollinger <rbollinger61@yahoo.com>
Subject: Re: The Amethyst Condominium 5313 Collins Avenue

RE: The Amethyst Condominium 5313 Collins Avenue

Salgueiro, Ana <AnaSalgueiro@miamibeachfl.gov>

Tue 9/5/2023 7:34 AM

To: Jeffrey Giordano <jgiordano@gpssecurity.us>; ealvarez@miamimmanagement.com <ealvarez@miamimmanagement.com>; Elaine Vargas <evargas@miamimmanagement.com>; ccarr@miamimmanagement.com <ccarr@miamimmanagement.com>; Rothstein, Steven <StevenRothstein@miamibeachfl.gov>; Singh, Narinder <NarinderSingh@miamibeachfl.gov>; Alvarez, Ibrahim <IbrahimAlvarez@miamibeachfl.gov>
Cc: Naya@nayaarchitects.com <Naya@nayaarchitects.com>; ISELIA MONTEAGUDO <IHM23@msn.com>; Robert Bollinger <rbollinger61@yahoo.com>; pedrorossie@gmail.com <pedrorossie@gmail.com>

Good morning Mr. Giordano,

We have not turned a blind eye. We have sent structural engineers and building inspectors to the property several times. We have also contacted the engineers responsible for the inspection of the work.

Violation US2021-03920 10/25/2021 NOTICE OF VIOLATION ISSUED. Evidence of Water intrusion. Need to submit engineer's report identifying source of water intrusion and methods of repairs. Need to obtain approved permit(s) and final inspection(s).

And US2021-03704 7/26/2021 NOTICE OF VIOLATION ISSUED. 5313 COLLINS AVE. Notice of violation has been issued due to evidence of spalling concrete. Need to submit a report signed and sealed by engineer to evaluate the structure and determine if the building may remain occupied or any occupancy limitations in order to remain occupied, as well as methods of repairs. Need to obtain approved permit(s) and call for inspections.

The concrete restoration BC2116519 permit was finalized in March of 2023. We had issued a stop work order on the Balcony work in May of 2022 which required the revision to the plans in order to incorporate this scope into the concrete restoration. The Violation US2022-04046 NOTICE OF VIOLATION ISSUED /STOP WORK ORDER. Commenced work on Balconies and columns that are not reflected on approved plans/revision(s). Need to submit engineer's evaluation of the integrity of the structure at areas done without permits, cannot occupy areas done without permits. Need to submit the required documents to obtain approved permit(s) and inspections.

The work performed under the concrete repairs and restoration was inspected by Fernando Azcue PE 65521

Special Qualifications

Qualification Effective

Structural 1

08/02/2005

Special Inspector

12/17/2008

The Building Department has monitored and we continue to monitor the property the same as we monitor all of the buildings within the City of Miami Beach.

Respectfully,



Ana M. Salgueiro, P.E.,

Director, Building Official

BUILDING DEPARTMENT

1700 Convention Center Drive, Miami Beach, FL 33139

Tel: 305-673-7610 ext 26587

AnaSalgueiro@miamibeachfl.gov

We are committed to providing excellent public service and safety to all who live, work and play in our vibrant, tropical, historic community

From: Jeffrey Giordano <jgiordano@gpssecurity.us>

Sent: Saturday, September 2, 2023 6:27 PM

To: ealvarez@miamimmanagement.com; Elaine Vargas <evargas@miamimmanagement.com>; ccarr@miamimmanagement.com

Cc: Naya@nayaarchitects.com; Salgueiro, Ana <AnaSalgueiro@miamibeachfl.gov>; JSELA MONTAAGUDO <JHM23@msn.com>; Robert Bollinger

<rbollinger61@yahoo.com>; pedrorossie@gmail.com

Subject: Re: The Amethyst Condominium 5313 Collins Avenue

THIS MESSAGE CONTAINS PRIVATE AND CONFIDENTIAL INFORMATION. IF YOU HAVE RECEIVED THIS MESSAGE BY MISTAKE, PLEASE NOTIFY THE SENDER IMMEDIATELY AND DELETE THIS MESSAGE FROM YOUR SYSTEMS.

Ana the city of Miami Beach has turned a blind eye to the Amethyst condominium located at 5313 Collins Avenue endangering the lives of all who live there. Complete balcony removals, chunks of concrete that fell from the side of the building injuring a resident from a slip and fall due to concrete debris that have fallen (See attached letter), a foundation structural beam that was almost cut in half and cosmetically covered and painted. Every floor the runs adjacent to the structural beam, ceiling taken out and temporary repairs done. The city has turned a blind eye to all of this, timing a building shut down to benefit the developer Mast capitol just as it did at our adjoining property LaCosta. But at the present those who inhabit the building are in fear for their lives without the release of engineering reports that the board is attempting to destroy.

I have attached proof that these reports exist from GCI Consultants (This is no longer in litigation regarding the email) A.S.D Consulting and Hellas Engineering. What has the city done to obtain these reports or have they allowed all this work to be conducted under concrete restoration permits failing to properly obtain engineering reports.

Our President of the Association Luis Naya is also the architect on records (Naya Architects) prior to him becoming the president of the association he led a building committee at the Amethyst who never had one open meeting to its residents failing to disclose the true damage of our building. The Amethyst board of directors and Miami management Refused to release engineering reports, inspection reports, Contracts of work performed, forcing an arbitration where they even had to be put on official notice not to destroy life threatening

engineering reports. We had a special assessment last November for \$450,000 regarding a new roof and were advised that we can not proceed due to the structural damage of our building. This is alarming to say the least.

Please advise the safety of our building to relieve the anxiety of all who live there. has the city deemed this building safe? The collapse of the surfside building has remained in all our minds and prayers, and we appreciate the city of Miami beach's swift response to assure they have read these inspections and engineering reports and can deem our building safe to inhabit. Thank you

Jeffrey S Giordano
President

Giordano Protection Services LLC.
GPS Security/PI Miami
www.gpssecurity.us
O 305.925.7524
C 305.710.5222

CONFIDENTIALITY NOTICE:

UNAUTHORIZED INTERCEPTION IS PROHIBITED BY FEDERAL LAW

[Electronic Communications Privacy Act of 1986, 18 U.S.C. 2701(a) and 270

This message is intended exclusively for the individuals and entities to which it is addressed. This communication, including any attachments, may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete all copies of this message.

From: Jeffrey Giordano
Sent: Wednesday, August 30, 2023 2:23 PM
To: eaivarez@miamimmanagement.com; elaine.vargas@miamimmanagement.com; ccarr@miamimmanagement.com
Cc: nayaarchitects.com <Naya@nayaarchitects.com>; Ana Salgueiro <AnaSalgueiro@miamiabeachfl.gov>; ISELA MONTEAGUDO <IHM23@msn.com>; Onix M. Padron <onix@otvcreative.tv>; Robert Bollinger <rbollinger61@yahoo.com>; pedrorossie@gmail.com <pedrorossie@gmail.com>
Subject: The Amethyst Condominium 5313 Collins Avenue

Miami management and the Amethyst board of Directors conspired in withholding engineering reports from GCO Consultants, J.N Sheingold P.E, Pistorino, Hellas Engineering. The withholding of these engineering reports could lead to the death of residents at the Amethyst condominium. Luis Naya who is the architect on record and the owner of Naya architects along with Pedro Rossie who led the Canero group formed a construction committee never opening one meeting to residents and failed to allow owners damaging engineering reports that would cause an immediate shut down of our building. I am demanding these reports be released immediately so I can forward them to the city of Miami Beach building department for a review of the safety of our building. Mr. Naya, you stated on record at a meeting that the main structural column was severely damaged and only a temporary repair would be able to be performed.

Miami management has also refused to provide owners ledgers from 2023 in which they allowed board members and members of the Canero group to not pay their maintenance and be able to maintain their board position. The below documents listed are being withheld along with a fraudulent bank loan application document that was used to obtain funds on our building which at the time of submitting these documents there is no record of our treasure ever being appointed as a treasure at an official meeting. A board that was never appointed at the time of the loan or voted in by its members. Apparently appointed by a previous board that is not even listed on Florida division of corporation documents

Your obstruction is delaying supporting documents not only to the Florida bar association but to the Florida department of law enforcement, Miami Dade state attorney's office and the city of Miami Beach. You are responsible for securing the following document regarding right to inspect sent and arbitration notice sent the following documents are being withheld from June 26, 2023, right to inspect . The right to inspect request dated June 26th The following documents are pending one, Miami management's official aged owner balance reports / occupant ledgers for maintenance and assessments paid by each owner from January to present and numbers 1. 3. 5. 7. 10. 12 14. 15.

August 1st right to inspect the entire request denied items 1 and 2. I have retimed an attorney that you are well aware of as they put Miami Management and the board of directors on notice to preserve these documents containing life threatening engineering reports, as I will be seeking a court order to obtain them.

Mr. Naya, you have also submitted fraudulent documents (Signing an affidavit swearing to the facts) in a civil case local case number 2023-019570-CA-01 State case number 132023CA019570000001 using unit owner's signatures to appear that they were aware of a memo of understanding that the board was concealing and presented after signatures signing date of the changing of our Bylaws. This is fraud and interfering in real estate transactions.

A direct complaint with the DBPR will be filed against Miami management, Elizabeth Alvarez and Elaine Vargas management CAM licenses along for their obstruction in violating Florida statute 718.111

Jeffrey S Giordano
President

Giordano Protection Services LLC.
GPS Security/PI Miami
www.gpssecurity.us
O 305.925.7524
C 305.710.5222

CONFIDENTIALITY NOTICE:

UNAUTHORIZED INTERCEPTION IS PROHIBITED BY FEDERAL LAW

[Electronic Communications Privacy Act of 1986, 18 U.S.C. 2701(a) and 270

This message is intended exclusively for the individuals and entities to which it is addressed. This communication, including any attachments, may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete all copies of this message.

BUILDING DEPARTMENT
1700 Convention Center Drive
Miami Beach, Florida 33139
www.miamibeachfl.gov

NOTICE OF VIOLATION

Violator:

Pelier, Robert Monteagudo, Isela
5313 COLLINS AVE 611
MIAMI BEACH, FL -331402566

Owner:

Pelier, Robert Monteagudo, Isela
5313 COLLINS AVE 611
MIAMI BEACH, FL -331402566

Case Information:

Case No: US2021-03704

Sub-Type: Unsafe Structures

Date Inspected: 07/22/2021

Property Address: 5313 COLLINS AVE

Fees (if applicable):

Proximity/Unit: 5313 COLLINS AVE

Permit #:

Days to Comply: 30

You must take the necessary action(s) to correct or eliminate the violation(s) and **contact the Inspector listed below.** If you do not comply within **30 days** from receipt of this notice, the City of Miami Beach Building Department will file charges and present this case before the governing agency having jurisdiction. If you intend to pull a permit in response to this violation, a copy of the violation notice must be supplied to the Building Department. Any fines or fees incurred from this violation that remain outstanding will result in a lien being placed on the property.

Received By:

Ibrahim Alvarez
Senior Building Inspector

Signature: _____

Printed Name: _____

VIOLATION(S)

Unit: BV-9050

MIAMI-DADE COUNTY, CHAPTER 8, SECTION 8-5 - UNSAFE STRUCTURES (b) PHYSICAL CRITERIA. (2) A BUILDING, OR PART THEREOF, SHALL BE PRESUMED TO BE UNSAFE IF: (ii) THERE IS A DETERIORATION OF THE STRUCTURE OR STRUCTURAL PARTS.

NOTICE OF VIOLATION ISSUED. 5313 COLLINS AVE.

Notice of violation has been issued due to evidence of spalling concrete. Need to submit a report signed and sealed by engineer to evaluate the structure and determine if the building may remain occupied or any occupancy limitations in order to remain occupied, as well as methods of repairs. Need to obtain approved permit(s) and call for inspections.

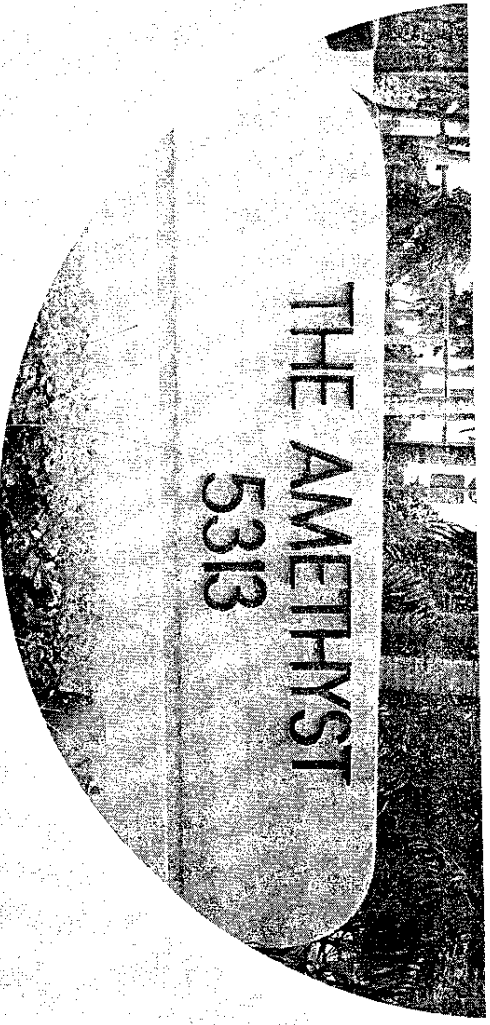
As per Florida Building Code and Miami-Dade County chapter 8-5 (6) Physical criteria (2) building is unsafe, the building Official has the authority to deem and declare the property UNSAFE.

Additional specific details concerning the violation together with photographs can be obtained from the Building Department Violation Section in writing upon request.

You have the right to appeal this decision of the Building Official to the Unsafe Structures Board in accordance with Chapter 8, section 8-5 of the Miami-Dade County Code. Failure to comply by the due date will result in the Building Official requesting a hearing before the Unsafe Structures Board on the next available calendar. Unless the decision of the Unsafe Structures Board is appealed, the building or structure shall be demolished without further notice.

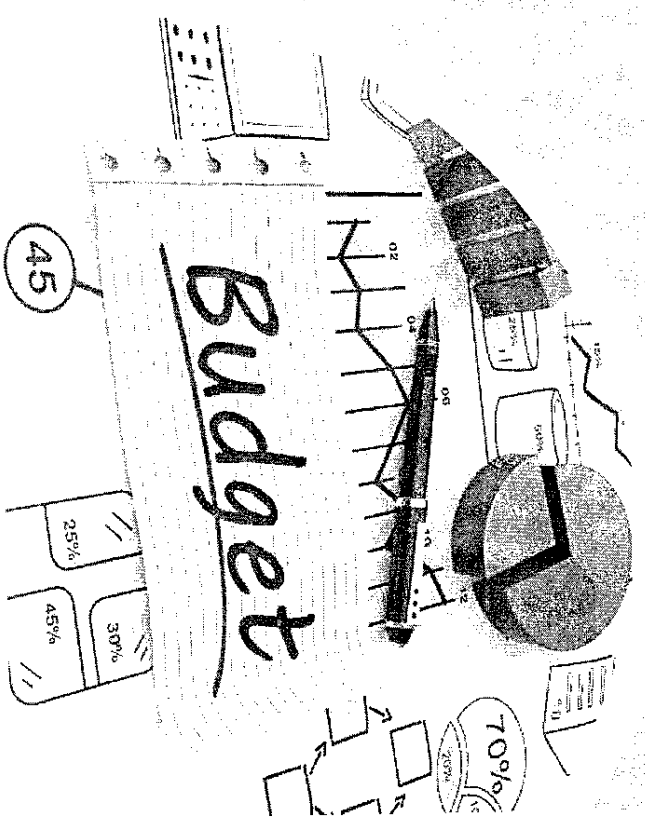
Violation will not be closed until final inspection is obtained in the related permit(s) to close the case.

Exhibit A1



Budget review

- Amethyst Condo Assoc Inc
- July 18, 2022
- Board Of Directors:
 - Onix Padron – President-
 - Ron Speelman – Vice-President-
 - Noelia Grossi – Treasurer-

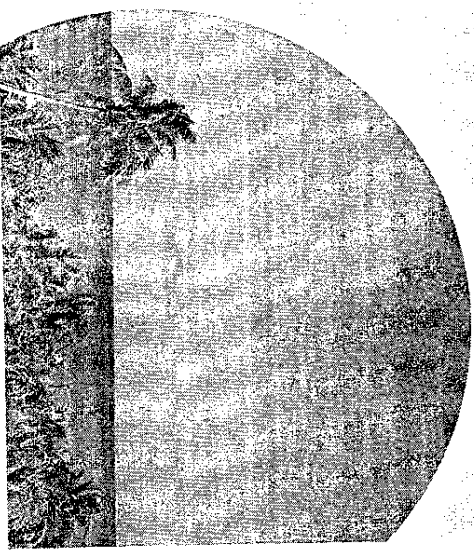


Introduction

Today we will review our budget and give you an overview of what we can expect for the upcoming months.

As Board Members, we are committed to maintaining the building in proper condition, that's why we will be focusing on safety and maintenance as a priority. Cosmetics (painting, decoration) will be treated as secondary.

The budget was prepared with a conservative approach which made it possible to keep the HOA flat without overseeing the safety of the building.



Agenda

01 Introduction

02 Income

03 Expenses

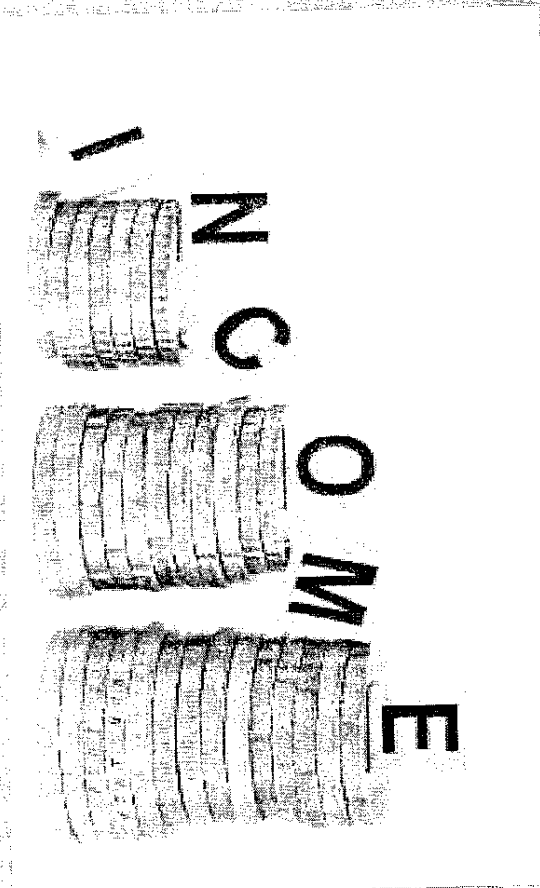
04 Questions



Income

We receive income from:

- HOA
- Laundry
- Gate key
- Screening fees
- Motorcycles Parking (starting 2022)



Income by Category Detail

- HOA: this is the regular maintenance of the building.
- Laundry: we keep a percentage of the total received when we do our laundry.
- Gate key: income from selling the gate keys.
- Screening fees: the difference between what we pay and what we charge potential owners or tenants.
- Motorcycles Parking (starting 2022): \$50 monthly fee per motorcycle.

Expenses

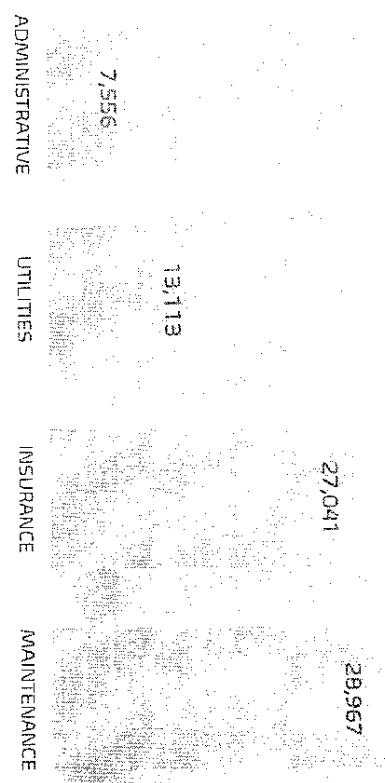
Expenses by Category

Monthly Average Trailing 10 months

The second part of the budget shows the Expenses.

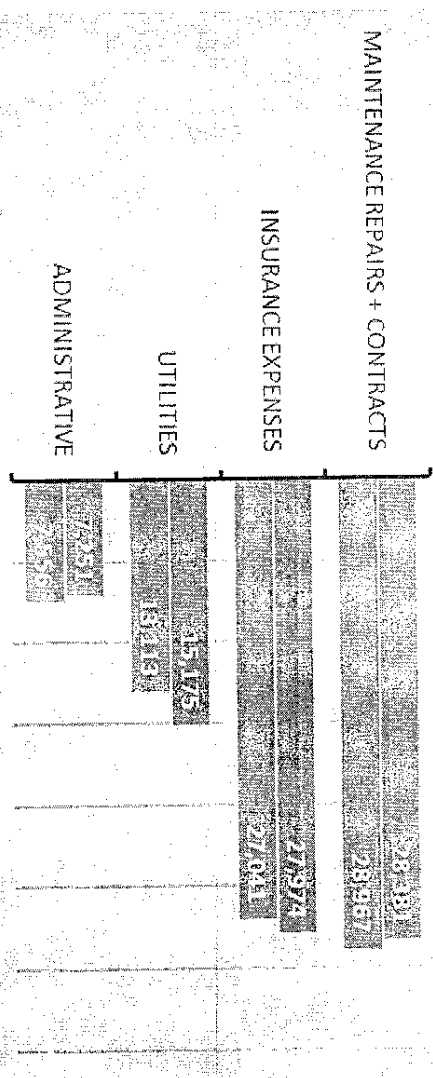
Our expenses categories are:

- Administration
- Insurance
- Utilities
- Repairs & Maintenance (includes contracts)



Total Actual Expenses past 10 months vs. Budget 2022-2023

Total Expenses - Actual vs Budget -



Administrative Expenses Detail

Actual Monthly Average

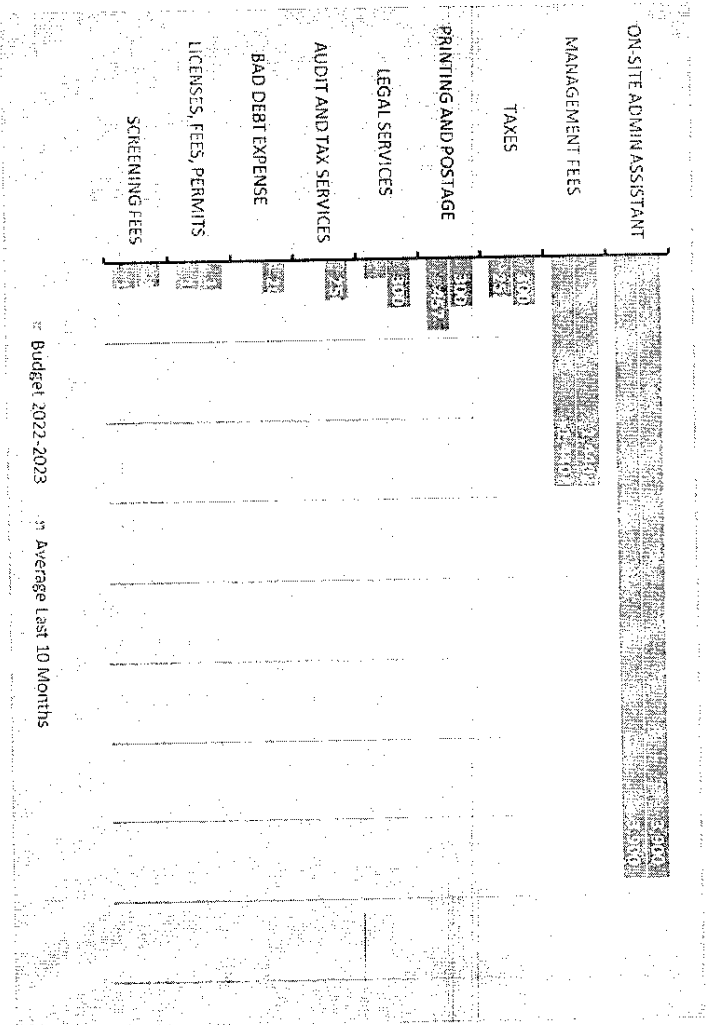
- On-Site Administrative Assistant
- Miami Management Fees
- Printing and Postage
- Miscellaneous: includes R&M expenses. The balance after the requested reclass should be zero.

Category	Amount
LEGAL SERVICES	121
COLLECTIONS/ADMIN EXP	138
SCREENING FEES	154
LICENSES, FEES, PERMITS	171
PRINTING AND POSTAGE	457
MISCELLANEOUS EXPENSE	798
MANAGEMENT FEES	1,440
ON-SITE ADMIN ASSISTANT	3,900

Average Vs. Budget 2022-2023

We are trying to lower the Printing & Postage expense.

For that purpose, Miami Management will replace letters with email blasts when possible.



Average Last 10 Months

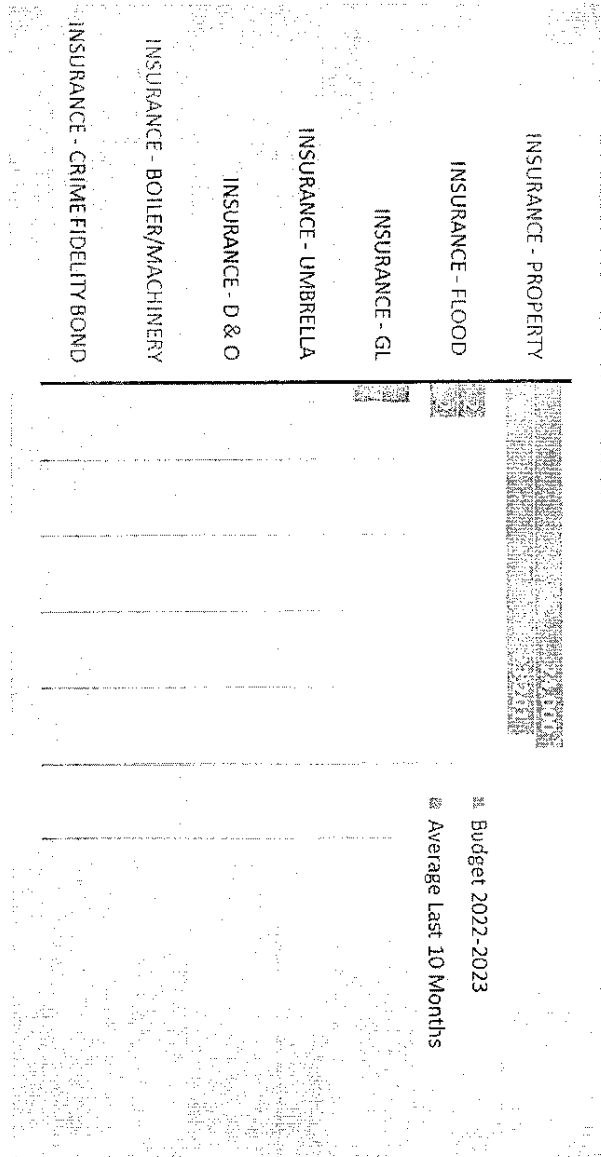
Insurance Expenses Detail

INSURANCE - CRIME/FIDELITY BOND	23
INSURANCE - BOILER/MACHINERY	25
INSURANCE - D & O	42
INSURANCE - UMBRELLA	57
INSURANCE - GL	1,319
INSURANCE - FLOOD	2,375
INSURANCE - PROPERTY	

23/201

Average Vs. Budget 2022- 2023

By end of 09/2022, we will receive the premium renewal amount.



Insurance Premium Increase

When we get the quote, we will review the budget and decide on whether we need a special assessment.

The insurance broker gave us a draft \$400/\$420K range estimate.

I used that max estimate to calculate how much could impact us if we need a special assessment to cover that expense.

INSURANCE EXPENSES	Annual		Difference	By Unit	
	Budget	Draft Estimated Annual Premium		Annual	Month
Description					
INSURANCE - UMBRELLA	720	900	180	2	0
INSURANCE - PROPERTY	288,000	360,000	72,000	600	50
INSURANCE - GL	16,600	21,000	4,400	35	3
INSURANCE - WINDSTORM	-	-	-	-	-
INSURANCE - FLOOD	28,963	36,600	7,637	64	5
INSURANCE - D & O	600	750	150	1	0
INSURANCE - BOILER/MACHINERY	300	375	75	1	0
INSURANCE - CRIME FIDELITY BOND	300	375	75	1	0
INSURANCE - FINANCE CHARGES	-	-	-	-	-
TOTAL INSURANCE EXPENSES	\$ 385,893	420,000	\$ 34,107	703	58

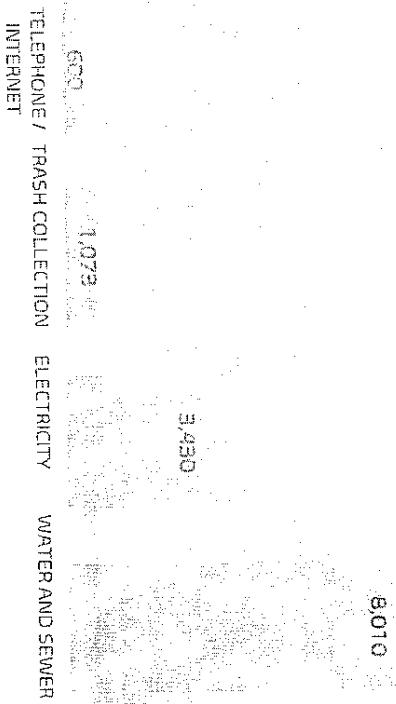
From: Jaime Ordonez <jo@eul.com>
 Date: Wednesday, June 29, 2022, at 6:25 PM
 To: Orik Padon <orikpadon@easternunited.com>
 CC: RON SPEELMAN, JR. <ron.speelman@yahoo.com>, ANGLIA GIOSSI <speelliaq@hotmail.com>
 Subject: Re: Amethyst > 2022 - 2023 = coverage or average prediction

Unfortunately when we don't see the new appraisal which we need to get closer to September 30th it's very difficult to give you a real number, when I say percentages its because that's what we have seen on average, if you paid last year \$350k this year could be \$400-\$420k, taking into account we don't have any major claims in between now and then, which is a big factor.

Jaime D. Ordonez, President
 Eastern United Insurance

Utilities Expenses Detail

Average Last 10 Months



Average Vs. Budget 2022-2023

Water expense:

This is the expense that fluctuates the most.

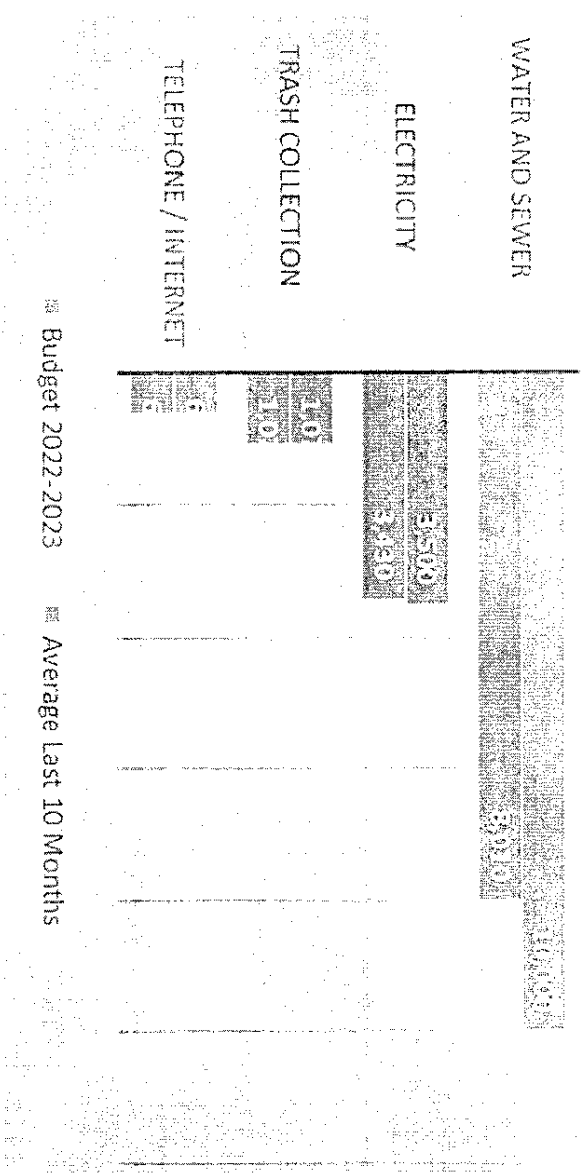
We used to have a \$14K monthly expense that was able to be lowered to \$8K.

(Check units' toilets, gym toilet)

If you know about any water leak, please let MM know



Average Vs Budget



Average Last 10 Months

Repairs & Maintenance
Expenses
Detail

(includes contracts)

INSURANCE STIPEND	150	185	194	209	218	244	455	567	785	1,129	1,202	1,243	
PEST CONTROL-EXTERIOR													
PLUMBING MAINTENANCE													
LANDSCAPE MAINTENANCE													
ICE MAKER MAINTENANCE													
LOCKSMITH SUPPLIES & REPAIRS													
POOL SERVICE													
ELEVATOR SUPPREPAIRS													
REPAIRS-MATERIALS/SUPPLIE													
ELEVATOR CONTRACT													
GENERAL REPAIRS & MAINT.													
FIRE ALARM MAINTENANCE													
JANITORIAL SERVICES													
MAINTENANCE PERSONNEL													
CONCIERGE													
													4,224
													5,094
													13,018

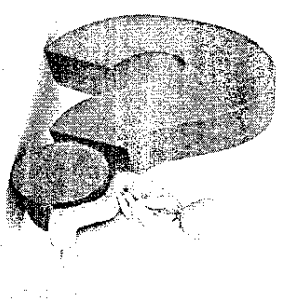
Average Vs. Budget 2022-2023

After preparing and distributing the Budget, we received the below service/increase notifications:

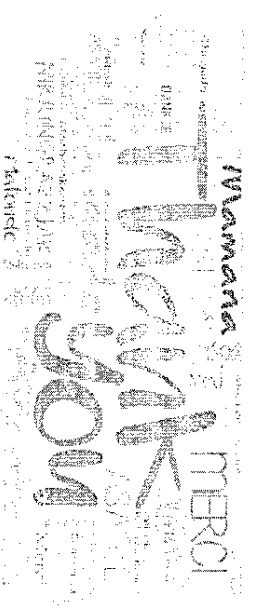
- * Concierge: the hourly fee will increase from \$12.5 to \$15 on 10/01/2022. \$15,484 a month.
- * Pool Service: will increase from \$450 to \$500 a month.

	Budget 2022-2023	Average Last 10 Months
CONCIERGE		
MAINTENANCE PERSONNEL		
LANDSCAPE SERVICES		
FIRE ALARM MAINTENANCE		
GENERAL REPAIRS & MAINT.		
ELEVATOR CONTRACT		
REPAIRS-MATERIALS/SUPPLIE		
ELEVATOR SUPP/REPAIRS		
POOL SERVICE		
LOCKSMITH SUPPLIES & REPAIRS		
ICE MAKER MAINTENANCE		
LANDSCAPE MAINTENANCE		
PLUMBING MAINTENANCE		
PEST CONTROL-EXTERIOR		
INSURANCE STIPEND		
GYM MAINTENANCE REPAIRS		
WATER TOWER TREATMENT		
GATE REPAIRS		
POOL REPAIRS & SUPPLIES		
BUILDING PERMITS		
FIRE EQUIPMENT EXPENSES		

QUESTION



- Please ask any budget-related questions.
- If you have new questions after the meeting, please feel free to contact us.



Thank you everyone for attending in person or virtually.

Exhibit A2

Annual Meeting for The Amethyst Association

Date: 6/06/2022

I. Call to Order by the President.

The meeting at the Amethyst Condominium was called to order on **6/06/22 at 6:32 PM.**

II. Quorum Established

There was no quorum for the annual meeting, therefore no annual meeting was conducted. Moving on to the election of officers.

III. Election of Officers

Approval by acclaimed of Onix Padron, Noelia Grossi and Ronald Speelman.

Onix Padron for President. Motion made by Ronald Speelman, seconded by Noelia Grossi. Onix Padron accepted. Votes passed unanimously.

Ronald Speedman for Vice President. Motion made by Onix Padron, seconded by Noelia Grossi. Ronald Speelman accepted. Votes passed unanimously.

Noelia Grossi for Secretary/Treasurer. Motion made by Onix Padron, seconded by Ronald Speelman. Votes passed unanimously.

IV. Adjournment

Motion to adjourn meeting was made by Onix Padron, seconded by Noelia Grossi and Ronald Speelman. Votes passed unanimously. Meeting adjourned at **7:05 PM.**

Minutes submitted by:

Print Name: Sandra Reyes

Approved by:

Print Name:

Exhibit A3

2022 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

FILED
Mar 09, 2022
Secretary of State
3234258151CC

DOCUMENT# N49831

Entity Name: THE AMETHYST CONDOMINIUM ASSOCIATION, INC.

Current Principal Place of Business:

14275 SW 142 AVENUE
MIAMI, FL 33186

Current Mailing Address:

14275 SW 142 AVENUE
MIAMI, FL 33186 US

FEI Number: 65-0350811

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

MANSFIELD, BRONSTEIN & STONE, LLP
500 E BROWARD BLVD
#1450
FORT LAUDERDALE, FL 33394 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: ROBERT PELIER

03/09/2022

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title	PRESIDENT	Title	VP
Name	PELIER, ROBERT	Name	RODRIGUEZ, RUBEN
Address	14275 SW 142 AVENUE	Address	14275 SW 142 AVENUE
City-State-Zip:	MIAMI FL 33186	City-State-Zip:	MIAMI FL 33186
Title	TREASURER, SECRETARY		
Name	MONTEAGUDO, ISELA		
Address	14275 SW 142 AVENUE		
City-State-Zip:	MIAMI FL 33186		

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: ROBERT PELIER

PRESIDENT

03/09/2022

Electronic Signature of Signing Officer/Director Detail

Date

Exhibit A4

2022 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL REPORT

**FILED
Oct 04, 2022
Secretary of State
2496762465CC**

DOCUMENT# N49831

Entity Name: THE AMETHYST CONDOMINIUM ASSOCIATION, INC.

Current Principal Place of Business:

14275 SW 142 AVENUE
MIAMI, FL 33186

Current Mailing Address:

14275 SW 142 AVENUE
MIAMI, FL 33186 US

FEI Number: 65-0350811

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

MANSFIELD, BRONSTEIN & STONE, LLP
500 E BROWARD BLVD
#1450
FORT LAUDERDALE, FL 33394 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: ROBERT PELIER

10/04/2022

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title	PRESIDENT	Title	VP, SECRETARY
Name	NAYA, LUIS	Name	BOLLINGER, ROBERT
Address	14275 SW 142 AVENUE	Address	14275 SW 142 AVENUE
City-State-Zip:	MIAMI FL 33186	City-State-Zip:	MIAMI FL 33186
Title	TREASURER		
Name	MONTEAGUDO, ISELA		
Address	14275 SW 142 AVENUE		
City-State-Zip:	MIAMI FL 33186		

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: LUIS NAYA

PRESIDENT

10/04/2022

Electronic Signature of Signing Officer/Director Detail

Date

Exhibit B1

NOTICE OF SPECIAL ASSESSMENT MEETING OF THE BOARD OF DIRECTORS OF
THE AMETHYST CONDOMINIUM ASSOCIATION

NOTICE IS HEREBY GIVEN in accordance with the Association's By-Laws and Section 718.112, Florida Statutes, that a Special Assessment Meeting of the Board of Directors will be held in the Association's Meeting Room located at 5313 Collins Avenue, Miami Beach, FL 33140, on Tuesday, December 6th, 2022, at 7:00 P.M. You can also join the meeting through Microsoft Teams with the information and the end of this notice. The purpose of the Special Meeting is for the Board of Directors to consider and adopt a Special Assessment in the amount of \$1,030,000 is for the following items:

- (1) Insurance – Policy Renews 11/28/2022-----\$480,000.00
- (2) Reroofing -May be required as a condition of the insurance.
-----\$450,000.00
- (3) Concrete Restoration- To cover unforeseen conditions in the 3rd column being repaired. Will have to provide high strength shoring in floors 1 through 11. -----
-----\$50,000.00
- (4) Legal Fees: Paid to date and anticipated due to the extension requested by MAST and potential litigation due to change of By-Laws.
-----\$50,000.00

If the Board of Directors adopts the Special Assessment, this will be divided among the 120 units, for a total amount of \$1,030,000.00, that will be payable as described below:

1 st Insurance- Assessment due 12/15/2022	-----\$4,000.00 (1 time)
2 nd Reroofing- Assessment Starting 1/1/2023	-----\$625.00 Per Month (6 months)
3 rd Conc. Restoration- Assessment Starting 1/1/2023	-----\$69.44 Per Month (6 months)
4 th Legal Fees- Assessment Starting 1/1/2023	-----\$69.44 Per Month (6 months)
<i>Total</i>	-----\$763.88 Monthly Payment

AGENDA FOR SPECIAL MEETING

1. Roll Call and Certification of quorum of Directors.
2. Proof of Notice of Meeting.
3. Consideration and Adoption of a Special Assessment by the Directors.
4. Adjournment.

Dated: November 22, 2022

Microsoft Teams meeting

Join on your computer, mobile app or room device

[Click here to join the meeting](#)

Meeting ID: 297 768 023 865

Passcode: NUsJMy

Or call in (audio only)

+1 786-687-2582,271404135# United States, Miami

Phone Conference ID: 271 404 135#

**NOTICE OF SPECIAL ASSESSMENT MEETING OF THE BOARD OF DIRECTORS OF
THE AMETHYST CONDOMINIUM ASSOCIATION**

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Total	-----\$763.88 Monthly Payment

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Microsoft Teams meeting

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[Click here to join the meeting](#)

Meeting ID: 297 768 023 865

Passcode: NUJMy

Or call in (audio only)

+1 786-687-2582,,271404135# United States, Miami

Phone Conference ID: 271 404 135#

Exhibit C1



HUTCHISON | TUBIANA, P.L.L.C.

October 11, 2023

Via 1st Class United States Mail

The Amethyst Condominium Association
5313 Collins Ave.
Miami FL 33140

Miami Management
c/o The Amethyst Condominium Association
14275 SW 142nd Ave
Miami FL 33182

Campbel Property Management
c/o The Amethyst Condominium Association
1215 E Hillsboro Blvd
Deerfield Beach FL 33441

RE: Our Client: Jeffrey Giordano

Dear Sir or Madam:

Please be advised that this law firm represents Jeffrey Giordano in connection with damages he sustained arising out of your failure to release engineering reports and construction contracts in derogation of F.S. 718.111(12). The failure to release these reports is negligent in light of the recent Surfside disaster where each and every building on Miami Beach, and the eastern seaboard, has come under greater scrutiny; especially those buildings which are older such as the structure at 5313 Collins Ave. Mr. Giordano, similar to other residents, is forced to reside in a building with possible structural deficiencies and no transparency from the HOA. This has caused severe emotional and psychological injury to my client.

Pursuant to the provisions of Florida Statutes Section 627.4137, we hereby request that you provide us within the next thirty days, a sworn statement, of a corporate officer with regard to each policy of insurance, including excess or umbrella insurance concerning the above captioned claim. We would also appreciate you sending us a copy of the policy jacket and declaration page for this policyholder, as well as copies of any signed rejections forms, if applicable.

David G. Hutchison, Esq. * Vincent J. Tubiana, Esq.*

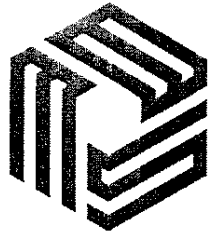
P.O. Box 371262 | 103401 Overseas Hwy. | Key Largo, FL 33037

TEL (305) 451-0013 FAX (305) 451-0024

**Admitted in OK, GA & D.C.*

INFO@FLORIDAKEYSLEGAL.COM | WWW.FLORIDAKEYSLEGAL.COM

Exhibit C2



MANSFIELD
BRONSTEIN &
STONE, LLP
ATTORNEYS AT LAW

GARY N. MANSFIELD, ESQ.
RONNIE BRONSTEIN, ESQ.
DAVID STONE, ESQ.

ARIANE WOLINSKY, ESQ. ‡
ROBERT J. MANSSEN, ESQ.
ALEKSANDRA KRAVETS, ESQ. †*
JENNIFER MURILLO-HURTADO, ESQ. †
ANITA PAOLI, ESQ. *

October 17, 2023

VIA EMAIL: vincent@floridakeyslegal.com

Hutchison/Subiana, P.L.L.C.
103401 Overseas highway
Key Largo, Florida 33037
Attn: Vincent J. Turiana, Esq.

Re: Amethyst Condominium Association, Inc. – Jeff Giordano

Dear Mr. Turiana,

We are in receipt of your October 11, 2023, correspondence on behalf of Jeff Giordano (“Giordano”) to our Client, Amethyst Condominium Association, Inc. (“Amethyst”) regarding an alleged failure to comply with an official records request. Please note that it appears as though your client, Giordano, has failed to disclose to you that he not only received access to all of the documents that he requested in his official records request, but he signed an acknowledgement confirming the same. As such, your demand is hereby rejected, and the Association considers this matter resolved.

On June 26, 2023, Giordano sent an official records request to the Association requesting to inspect, along with a long list of other items, the very documents that you allege were not provided to him in your October 11, 2023 letter. A copy of the June 26, 2023 correspondence is included with this response. After the receipt of the letter the Association’s property manager worked with Giordano to get a date that was mutually convenient for all parties to allow for the inspection. Giordano was provided with all documents that he requested in the June 2023 request on August 8, 2023, the date that was selected by Giordano after consultation with the property manager. At the August 2023 inspection, Giordano was provided with the requested documents and signed an acknowledgement that he was provided with every single document that he requested. A copy of the signed acknowledgement is included with this correspondence.

The remainder of the contents of your letter are wholeheartedly rejected. Should you have any further inquiries for our office you are free to reach out to me at any time. We expect this letter to fully address the issues contained in your letter and we consider this matter to be resolved. Thank you.

Respectfully,
Ronnie Bronstein, Esq.
FOR THE FIRM

Enclosures as stated.

*† Licensed in NY & FL - * Of Counsel - ‡ Licensed in CT & FL*

200 East Broward Boulevard • Suite 1250 • Fort Lauderdale, Florida 33301
954.601.5600 (phone) • 954.961.4756 (fax)
www.mblawpa.com

Exhibit C3



Giacomo Bossa, Esq.
gbossa@b2b.legal

August 29, 2023

VIA Email customers@miamimanagement.com

Miami Management c/o The Amethyst Condominium Association
14275 SW 142nd Avenue
Miami, FL 3386

VIA Email ccarr@miamimanagement.com

Cathie Carr – Registered Agent
11770 US Highway One
Suite 501
Palm Beach Gardens, FL 33408

RE: Demand for Preservation of Evidence

To Whom It May Concern:

This firm has been retained to represent Jeffrey Giordano (“Mr. Giordano”) and Sherlock Homes Investment (“Sherlock”) in connection with The Amethyst Condominium Association.

As you are aware, Mr. Giordano sent a letter demanding his right to inspect records pursuant to Florida Statute 718.111(15), which you subsequently denied. You have been properly notified that Sherlock Holmes Investments / Jeffrey Giordano is filing an arbitration hearing to obtain these documents regarding right to inspect requests dated June 26th and August 1, 2023.

As you are aware, once a party reasonably anticipates litigation, that party is under an absolute duty to identify, collect, and preserve all possible discoverable information until the matter is completely resolved. By this letter, you are hereby given notice not to destroy, conceal or alter any paper or electronic files, other data generated by and/or stored on your computer systems and storage media (e.g. hard disks, backup tapes) or in other place.

Be further advised that this document shall serve as formal notice of our Clients' demand pursuant to Rule 1.380 of the Florida Rules of Civil Procedure, to preserve and place a litigation hold on documentary evidence and electronically stored information related to this legal dispute.

This letter is to notify You of Your obligation to take reasonable steps to preserve and retain all hard copies and electronically stored information ("ESI").

BARAKAT
+ BOSSA

2701 Ponce de Leon Blvd #202
Coral Gables, FL 33134
(305) 444-3114



NOTE: In the event of a dispute arising out of your failure to preserve documents, we will rely on this letter in court as evidence of our request and notice of your preservation obligations. Your failure to preserve relevant data may constitute spoliation of evidence, which may subject you to monetary sanctions, or even more severe sanctions for spoliation beyond awards of costs and fees. Be advised also that courts have imposed sanctions such as adverse inference instructions, evidentiary presumptions, defaults, and striking of pleadings to remedy the loss of relevant evidence. See *Flury v. Daimler Chrysler Corp.*, 427 F.3d 939, 944, 946-947 (11th Cir.2005), *Nationwide Lift Trucks, Inc. v. Smith*, 832 So. 2d 824, 826 (Fla. 4th DCA 2002), *Harrell v. Mayberry*, 754 So. 2d 742 (Fla. 2d DCA 2000).

SCOPE OF OBLIGATION TO PRESERVE DOCUMENTS: Our Client's request referenced above and attached would involve a broad scope of hard copies and Electronically Stored Data. To fulfill Your preservation obligation, You must take reasonable efforts and steps to preserve all hard copy documents and Electronically Stored Information ("ESI") relevant and/or related to this matter, including, but not limited to:

a) retaining, preserving and suspending your data destruction from any network, software, computer hard drives, clouds, iClouds, google drives, cell phones, text applications, instant messenger, emails from any Miami Management email, any employee emails, emails with accountants, accounting software such as Quickbooks or its equivalent, iPad or similar devices;

b) retaining, preserving and suspending destruction/deletion of active, archived, and deleted copies of ESI, such as emails, voicemails, text messages, instant messages (IMs), calendars, diaries, word processing files, spreadsheets, PDFs, JPEGs, PowerPoint presentations, database files, temporary internet files, cookies, and .ZIP files, among others;

c) retaining, preserving and suspending the destruction/deletion of the ESI's metadata, including the date it was created, the date it was last modified, and the name of the individual who created it;

d) retaining, preserving and suspending the destruction/deletion of OTHER KNOWN FILE TYPES whether stored online, offline, in a cloud-based server or in other electronic storage, or on any computers, handheld devices, tablets, cell phones, or other devices over which you have possession, custody, or control; preserving relevant software, including legacy software (unless an exact copy or mirror image is made and stored) and hardware (computers and cell phones) that are no longer in service but was in service;

e) retaining and preserving necessary information to access, review, and reconstruct (if necessary) relevant ESI, including identification codes and passwords, decryption applications, decompression software, reconstruction software, network access codes, manuals, and user

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instructions;

f) retaining, preserving and suspending/deleting all relevant backup data or other storage media; and

g) any other reasonable steps necessary to prevent the destruction, loss, override, or modification of relevant data, either intentionally or inadvertently, such as through modification of your document retention policy and systems.

All ESI must be preserved intact and without modification. This above list is not exhaustive, and you must preserve all information that is potentially relevant to this matter.

GOVERN YOURSELF ACCORDINGLY.

Sincerely,

/s/ Giacomo Bossa

GIACOMO BOSSA
For the Firm

Today's Date: June 26, 2023

Florida law provides: "The official records of the association are open to inspection by any association member or the authorized representative of such member at all reasonable times. The records of the association shall be made available to a unit owner within 45 miles of the condominium property or within the county in which the condominium property is located within 5 working days after receipt of written request by the board or its designee." Further, "The failure of an association to provide the records within 10 working days after receipt of a written request shall create a rebuttable presumption that the association willfully failed to comply." SEE: § 718.111(12), Florida Statutes.

THE BOARD OF DIRECTORS OR ITS DESIGNEE OF The Amethyst CONDOMINIUM ASSOCIATION:

I request to inspect the following official records of the association:

List of each document to be inspected and/or copied Was the document provided?

1. Official aged owner balance reports for maintenance and assessments January, February, March, April, May, June for 2023 Yes/ No
(These financial records must be made accessible to unit owners. The only records that are exempt are medical records, credit card numbers, bank account numbers, and social security numbers) there is no exception to these records.)
2. Official monthly collection summary from our association's attorney for Jan, Feb, March, April, May, June 2023
3. Real-estate/Sales contract for commercial units CU1 and CU2 Yes/No
4. Official dated/page numbered memo of understanding between The Amethyst Condominium Association Inc, Canero Group, llc. 5313 Collins acquisitions, llc.
5. All current and past engineering reports from any company's conducting engineering inspections on our building for the past 7 years to include all documentation, final report from GCI consultants an engineering firm that was hired and report used for the hurricane Irma insurance claim. This report has crucial information on our building and the life and safety of our unit owners and is detrimental for review which may lead to the deaths of many in our building should this information be refused. Yes/No
6. Minutes of HOA annual meeting held on June 30th, 2022 yes/no
7. Minutes of the budget meeting held on July 18th, 2022 yes/no
8. Minutes from the HOA meeting held on October 11th, 2022 yes/no
9. Meeting from the meeting assigning Naya and current board members of officers of the association. Provide all minutes of meetings starting from the annual meeting of 2022 present Yes/no
10. Provide resignation letters for board members Onix Padron president, Ron Speelman vice president, Noelia Grossi Treasure for 2022 Yes/no
11. Provide minutes of the board of directors' elections from the annual meeting of 2022 Yes/no
12. Official IRS tax fillings for 2021 and 2022 Yes/no
13. All dated bids pertaining to the current special assessment along with any contracts signed associated with the bids Yes/no

14. All invoice for attorney services billed to the Association from June of 2022 to the present June of 2023 Yes/No
15. All signed contracts, invoices associated with all the recent concrete restoration, balcony repair, foundation columns and all engineering reports associated with the project from 2020/2021/2022/2023 yes/No

Unit Owner: Jeffrey S Giordano 305-710-5222 email: jgiordano@gpssecurity.us
representative/owner/President Sherlock Homes Investments llc.
Unit Number: 302

5313 Collis Avenue Unit 302 Miami, Beach, Fl 33140

Note: At the reviewing and copying of all records requested I am requesting a representative from Miami management or a representative from the association to initial each numbered request that the records were provided along with my initials on next to the circled yes or No on the requested records.

Certified Mail: 7020 0640 0001 3405 3427

USPS Tracking: 9590 0402 7062 1225 4176 49

Today's Date: August 1, 2023.

Certified Mail: 7020 0640 0001 8562 2337 Tracking: 9590 49402 7062 4176 43

Florida law provides: "The official records of the association are open to inspection by any association member or the authorized representative of such member at all reasonable times. The records of the association shall be made available to a unit owner within 45 miles of the condominium property or within the county in which the condominium property is located within 5 working days after receipt of written request by the board or its designee." Further, "The failure of an association to provide the records within 10 working days after receipt of a written request shall create a rebuttable presumption that the association willfully failed to comply." SEE: § 718.111(12), Florida Statutes.

THE BOARD OF DIRECTORS OR ITS DESIGNEE OF

The Amethyst CONDOMINIUM ASSOCIATION:

I request to inspect and copy the following official records of the association:

List of each document to be inspected and/or copied Was the document provided?

1. Copy of All insurance policies, costs of policies, policy coverage
Yes / No
2. Signed loan documents submitted to bank, that were approved on the recent loan taken out by the association in excess of \$300,000. All signed and initialed documents related to the nature of the loan, purpose of the loan, type of loan ex: HOA, conventional etc.
Yes/No

Jeffrey Giordano owner/representative Sherlock Homes Investments llc.

5313 Collins Avenue Unit Number: 302

Miami, Florida 33140 305-710-5222

Exhibit D1

From Jeffrey Giordano Unit 302

October 24th,2022

Owner representative Sherlock Homes Investments Limited Liability Company
5313 Collins Avenue Apt 302
Miami Beach, Florida 33140

The Amethyst Certified Mail: 7020 0090 0001 2202 6335, UPS Tracking: 9590 9402 6537 1028 0952 81

Ronnie Bronstein Certified mail: 7021 2720 0001 1962 4886 Tracking 9590 9402 6537 1028 0953 74

5313 Collins Acquisitions Certified Mail: 7021 2720 0001 1962 4879 Tracking 9590 9402 6537 1028 0953 67

Notice of Demand per Florida Statute 722.11 (Civil remedy for theft or exploitation, civil theft of funds) regarding the sale of commercial units CU1 and CU2, insurance, special assessment proceeds.

To Mr. Ronnie Bronstein Association Attorney, The Amethyst Condominium Association, Inc. board of Directors Luis Naya, Robert Bollinger, Isela Montegudo. 5313 Collins Acquisitions Limited Liability Company.

Florida statute 718.1255 states that Disputes does not include any disagreement that primarily involves: title to any unit or common element, violation of fiduciary responsibilities, criminal referrals. Therefore, a mandatory arbitration request is not needed.

An email was sent to the association and its representatives on October 14th, 2022 regarding the immediate cease and desist the sale of commercial units CU1 and CU2 until the proper right to inspect of amendment documents are reviewed, as the sale of these units will greatly affect the value of our common areas, our units and will greatly favor the developer attempting to take over our building as many contracts have a contingency regarding the sale of these commercial units.

At the HOA meeting held on October 11th, 2022. the Boards President (recorded) stated if you vote yes, members would receive \$10,000 if you voted no because you were misinformed than you will leave it for the developer.

The Associations attorney Mr. Bronstein it appears participated in misleading its members on receiving funds from this sale and the validity of the ballots for the sale stating look how many people we clearly have a quorum and I stopped counting well over 60 ballots. These Ballots

were never counted at the meeting in front of any of its members as the meeting agenda stated. The meeting agenda clearly specified item 4. Counting Association of the votes regarding the sale of the commercial units. At no time during the meeting did Mr. Bronstein count any votes in front of its members other than making a statement he stopped counting way past 60 and if anyone wanted to count the votes, they can request an inspection of the documents.

A right to inspect documents pertaining to the sale of these units was conducted on Tuesday October 18th. 2022 which finding revealed the meeting did not meet a quorum of the required 36 members of 120 needed to proceed. The official sheet of attendees was only 26 in total. During the inspection I was not provided as per my request of documents a Current roster of unit owners, A List of all unit owners registered to vote including all Limited Liability Company and corporation representatives, copy of signature cards, minutes of the meeting, Name of witnesses who counted and certified the ballots. By omitting these documents item numbers 2,3,4,5,6. Clearly validates my claim that the sale of these units is being sold improperly defrauding its members. Failure to provide documents for review also is a violation of Florida statute 718.111(12).

Mr. Naya also failed to mention the settlement of the Irma insurance claim that was settled and will be paid in the name of the Association. If the money from the sale of the commercial units will go to its members than The Irma claim and all bank funds any additional proceeds also belongs to its members and must be distributed equally to all unit owners.

I am putting The Amethyst condominium Association, Its current and previous Board of Directors, Mr. Ronnie Bronstein, 5313 Collins Acquisitions, Limited Liability Company on official notice that I will be pursuing civil action and requesting a criminal investigation from the Miami Dade State Attorney's office against The Amethyst Condominium Association and its Association attorney Mr. Ronnie Bronstein and 5313 Collins Acquisitions Limited Liability Company in its involvement of possible real estate fraud by falsifying and improper verification of ballots casted for the sale of our commercial units CU1 and CU2 which are common areas for the owners/ members of the Association, misappropriation of insurance proceeds, association dues, special assessment money collected and all bank accounts.

Pursuant to Florida Statute 772.11, demand is hereby made for the immediate cease and desist of commercial units CU1 and CU2 And that the Association immediately inform its members that the sale of these units has been immediately suspended and ballots voided until a proper meeting with a quorum is conducted with witnesses validating signature cards and an official counting of ballots.

A contractual commitment to its members of the distribution of the funds from the sale of the commercial units. A contractual commitment for the proceeds from all bank accounts, hurricane Irma insurance claim, monthly maintenance dues and special assessment proceeds to be distributed to its members.

A contractual commitment of all bank and insurance proceeds.

Provide a complete breakdown of all bank accounts belonging to the Association to include the current settlement money received from Hurricane Irma claim.

The Scheme:

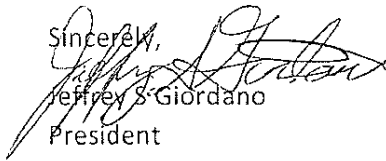
Board members from this current board and previous boards assisted Mast Capitol, 5313 Collins Acquisitions Limited Liability Company. in intimidating members of the Association into selling their units through threats of Insurance increases, special assessments, unsafe structure comments, withholding engineering reports on damages to the building through its Association attorney (Documented claiming it was part of litigation and refusing to release). Mr. Naya who stated with the City of Miami beach on several occasions that he was the Architect on record with the Amethyst was assigned to a building committee along with Pedro Rossie which never provided any meeting notices with its members, meetings minutes to any building committee meetings and met behind closed doors with board members. Mr. Naya at a board meeting claimed he had the bible of damages to our building holding up a large binder refusing to show members of the association any reports. Board members authorized additional sales of units to unit owners bypassing a bylaw of limiting purchases. The boards scheme continued with doing work on the building without permits knocking balconies down, creating a mess and spreading rumors of an unsafe structure to residence and a big assessment was coming and needed for repairs. Working with the Association attorney insurance proceeds were delayed from hurricane Irma's insurance claim until the developer received the amount of contracts needed to purchase our building and take over the association. Assessments paid to the association were than banked and all construction work was stopped while still collecting special assessments from its members. Insurance policy were not renewed closing the pool and making our building a further liability.

In return for their intimidation and their participation in stopping construction work to our building, validate the selling of commercial units, non-renewal of insurance policies, leaving insurance claim proceeds for the developer they would receive higher payouts for their units as board and committee members. once their sale contracts were signed for their units, they were to not run for a board position or immediately resign from the board. The scheme would Assure the Association attorney would validate the sale of the commercial units and would also receive large attorney's fees for his participation in the hurricane Irma insurance claim that would be left for the developer because of his delay with opposing council.

The scheme would also assure that Mast Capitol would be able to back out of honoring contractual commitment to renters and residents who have negotiated post occupancy. By assigning Mr. Naya to a board position and assisting them to report to the city of Miami Beach that the building is unsafe, and force immediate evacuation once closings were done. This would expedite a faster return for their investors.

Mast Capitol, 5313 Collins Acquisitions Limited Liability Company. would be able to recoup its fees paid out to board members that received higher contract selling amounts by receiving Hurricane Irma insurance claim moneys that were intentionally delayed by the association attorney only to be reimbursed to Mast Capitol at the dissolving of the association. Mast capitol would also receive special assessment money, maintenance fees in all bank accounts belonging to its members.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey S. Giordano". The signature is written in a cursive style with a large, stylized initial "J".

Jeffrey S. Giordano

President

Sherlock Homes Investments, Limited Liability Company.

Exhibit D1



Mansfield
Bronstein
& Stone, LLP
ATTORNEYS AT LAW

500 E. Broward Boulevard, Suite 1400
Fort Lauderdale, Florida 33394
Phone: (954) 601-5600

INVOICE

Invoice # 23056
Date: 11/14/2022
Due Upon Receipt

Maite Calas

18001-002 - Amethyst Condominium - General Corporate Representation

18001-002 - Amethyst Condominium - General Corporate Representation

Date	Timekeeper	Notes	Hours	Total
10/03/2022	RB	Emails regarding sale of commercial unit.	0.20	\$55.00
10/06/2022	RB	Review of amendment documents and memorandum. Emails with Luis regarding same.	0.50	\$137.50
10/11/2022	AW	Review email from RB re. emails from Giordano and whether settlement release for Irma case and Memorandum of Understanding are confidential or need to be provided to owners for review. Prepare response to RB re. whether settlement release for Irma case and Memorandum of Understanding are confidential or need to be provided to owners for review. Review statute in connection with same.	0.30	\$75.00
10/11/2022	RM	Rev of email from RB w correspondence from Giordano for review as to whether same is actionable. Email to RB re same.	0.40	\$100.00
10/12/2022	RB	Prepare for and attend meeting of members re: sale of commercial unit. Review of documents and emails received from Luis regarding Giordano and other matters. Emails regarding same.	1.20	\$330.00
10/13/2022	RB	Review of declaration for insurance provisions. Email regarding distribution of proceeds.	0.30	\$82.50
10/16/2022	RM	Rev of correspondence from Giordano and email from RB re potentially actionable statements. Email to RB w analysis.	0.40	\$100.00
10/17/2022	RB	Emails regarding various issues, including, insurance, voting and developer closings. Review of documents, declaration and statutes regarding same.	0.80	\$220.00
10/18/2022	RB	Review of insurance trustee agreement. Comments to same.	1.50	\$412.50
10/25/2022	RM	Rev of correspondence from Giordano to various entities and board members re potentially actionable statements. Detailed email to RB re same.	0.70	\$175.00

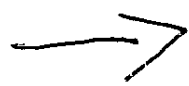


Exhibit D2

From Jeffrey Giordano

October 31st, 2022

Owner representative Sherlock Homes Investments Limited Liability Company
5313 Collins Avenue Apt 302
Miami Beach, Florida 33140

The Amethyst Condominium Association Certified Mail: 7019 2970 0000 1786, UPS Tracking:
9590 9402 5892 0034 7890 53

Ronnie Bronstein Certified mail: 7020 0090 0001 2202 6359 Tracking 9590 9402 6537 1028 0953 74

Mast Capitol / 5313 Collins Acquisitions, LLC, a Delaware limited liability company Certified
Mail: 7019 2970 0000 1786 5273 Tracking 9590 9402 2849 7069 3873 42

Pursuant to Florida Statute 772.11, I am hereby placing an additional demand from the October 24th demand letter. Written demand is hereby made to the Board of Directors of the Amethyst condominium Association, Mast Capitol / 5313 Collins Acquisitions, LLC, a Delaware limited liability company, The association attorney Mr. Ronnie Bronstein for the immediate cease and desist of the dissolving of The Amethyst Condominium Association, Inc. I am hereby revoking any consent that may have been previously given, as per our declaration X Termination. Cease and desist allowing the closing on any additional units pertaining to the developer Mast Capitol / 5313 Collins Acquisitions, LLC, a Delaware limited liability company until all right to inspect documents are satisfied and if denied until an official notification to the association and arbitration can be filed with the DBPR regarding right to inspect documents requested on October 24th, 14th and 31st, and until insurance proceeds are accounted for and adequately distributed to its members per our declaration.

A demand is hereby also placed on the Amethyst Association attorney Mr. Ronnie Bronstein and its current Board of Directors Luis Naya President, Robert Bollinger Vice President, Isela Monteagudo secretary to immediately record with the state of Florida an amendment on Sunbiz, listing Onix Padron as President, Ron Speelman as vice President and Norlia Grossi as treasure for their term served as board members per Florida state statutes and under the laws in the state of Florida governing non-for-profit Organizations.

In addition to the scheme outlined in October 24th demand letter the Scheme also included

Mr. Bronstein and the board of Directors consisting of Onix Padron President, Ron Speelman-Vice president, Noelia Grossi-Treasurer as listed on the July 18th, 2022 Budget meeting conspired to conceal their identity as board members on official records of the Association, violating Florida non-for-Profit Corporation recording of officers with the state under Florida statute 617 Corporations Not for profit.

Mr. Bronstein deliberately acted out of his own current and past filing law practices of documenting board members, officers of the corporation to the association, conspired with the developer and board in omitting listing them as officers of the Association on Sunbiz. This would assure shielding them from public view as board members on comparison of financial sales for their units, as officers responsible for assigning an Insurance trustee to our insurance claim, reporting violations to the City of Miami Beach and assisting 5313 Collins acquisitions in stopping of all construction work and renewing of insurance policies in return for high returns on their unit sales contracts.

Sunbiz does not reflect the June 30th, 2022, board members it jumps from March 2022 to only amend the board of directors on October 4th, 2022 October 2022. Onix resigned on September 30th, 2022, which I am sure is in line with the signing of her real estate agreement with the developer.

By not filing properly an amendment with new officers from the June 30th, 2022, annual meeting the above board of directors and Mr. Bronstein deliberately concealed association board members of a Florida non for-Profit corporation allowing them to misappropriate funds and insurance proceeds of the association with no accountability as a listed board members should date comparisons be made. With knowledge of a potential criminal referral being made to the state attorney's office, and Insurance Fraud Division for the misappropriation of insurance proceeds which may develop into a pending investigation, with both agencies, all the above-mentioned conspirators may be in violation of Florida Statute 918.13 Tampering with or fabricating physical evidence.

(1) No person, knowing that a criminal trial or proceeding or an investigation by a duly constituted prosecuting authority, law enforcement agency, grand jury or legislative committee of this state is pending or is about to be instituted, shall:

- (a) Alter, destroy, conceal, or remove any record, document, or thing with the purpose to impair its verity or availability in such proceeding or investigation; or
- (b) Make, present, or use any record, document, or thing, knowing it to be false.

The scheme involved Mast Capitol / 5313 Collins Acquisitions, LLC, a Delaware limited liability company, to purchase unit 303 on November 4th, 2021, for \$290,000 and Unit 312 on January 10th 2022 for \$210,000, under market value with some owners already under contracts from threats and intimidation. These units are strategically located on the 3rd floor on adjacent sides of the building. The plot included removal the west firewall on unit 312, located on the southeast corner of the building and remove the firewall facing east to unit 303 located on the northwest corner of the building. This would assure a fire would spread on both sides of the building rapidly, maximizing the amount of damage. Coincidentally these two units were purchased from different unit owners, and they mysteriously both have alleged mold damage with no intent of leasing the units. By removing the fire

wall in between units without a permit and exposing electrical outlets and wiring 5313 Collins acquisitions needed to make the City of Miami Beach aware of these violations with the intent to be taken to the unsafe structure board, so with coordinated efforts from the board of directors, the board would file a complaint with city officials that work was being conducted without permits prompting an inspection with code enforcement.

This inspection results required a 24/7 fire watch at our building draining the funds from our association. The city would sticker both units on July 7th, 2022 a timed violation notice with city officials giving 90 days for compliance. The timing of the violation would assist the city, Mast Capitol / 5313 Collins Acquisitions, LLC, a Delaware limited liability company, In a building shut down once closings occur in November on multiple units.

On Thursday October 27th a fire was set at the adjacent building LaCosta which currently Mast Capitol/5333 Collins acquisitions, LP own and are involved in civil litigation. The fire occurred on the west side of the building facing the Amethyst. Residents of the amethyst stood in horror watching the flames and wondering if the Amethyst will be next. Could this have been a practice run of a fire planned for the amethyst? Approximately 6 members from Mast capitol arrived to watch the fire, one from a picture obtained from the scene appeared to be Camilo Miguel Jr. There immediate response to the location raised a concern if this was coordinated with the fire and if they were staged close by to evaluate the Carnegie.

This scheme included the misappropriation of insurance proceeds by assigning an insurance trustee of Mast Capitol / 5313 Collins Acquisitions, LLC, a Delaware limited liability company's choice.

A meeting to the members was never posted on assigning an Insurance Trustee for the Hurricane Irma claim, nor on the amount the members of the association received, as per our declaration 14.03 Loss Provision-Insurance trustee, and no documentation of the Trustee was provided to any members at an open meeting acknowledging that the policies and any proceeds thereof will be held in accordance with the terms of our declaration. Per our declaration the sole duty of the insurance trustee shall be to receive such proceeds are paid and hold the same in trust for the purposes stated in the declaration and for the benefit of the Association, the unit owners, and their respected mortgages also referred to as the "Beneficial Owner"

The following statutes appear to apply on the actions taken by all involved in the demand, and the previous scheme mentioned on the October 24th demand letter:

812.014 Theft (Insurance proceeds and special assessment moneys uned for other than what it was intended for)

817.03 Making false statements to obtain property (Meeting from October 11th statements made by Naya the bords president and Ronnie Bronstein the Associations attorney to obtain a yes vote for the sale of commercial units)


817.15 False entities in Books of Business entities (failing to file with the state of Florida officers of the corporation)

895.01 Florida RICO (Racketeer Influenced and corrupt Organization)

896.101 Florida Money Laundering Act

501.201 Florida Deceptive and Unfair Trade Practices

517.011 Florida Securities and Investor Protection Act

 10-31-2022
Jeffrey S. Giordano representing Sherlock Homes Investments, llc.

5313 Collins Avenue Unit 302 Miami, Beach,

Exhibit E1

THE AMETHYST

CONDOMINIUMS OF MID BEACH

September 4, 2022

To the Amethyst Community,

IN AN ATTEMPT TO RESPOND TO YOUR QUESTIONS AND CONCERNS REGARDING THE SALE OF THE BUILDING to the EXTENT WE ARE PERMITTED:

1. On Tuesday August 30th the Board ALONG with our Attorneys met with MAST and their attorneys to verify AND COUNT the ORIGINAL signatures of the documents submitted by MAST to be recorded for the changes to our By-Laws AND to discuss THE concerns of the Community regarding the sale of the Units / Building.
2. This meeting was held under a confidentiality agreement between MAST and the Board. For this reason, we CAN NOT discuss the specifics of this meeting until THERE IS AN AGREEMENT BY BOTH PARTIES. Both parties have not YET agreed to release the details of the discussion.
3. OUR attorneys COUNSELED THAT THE MEETING WAS appropriate, and we agreed to MEET under their advice.
4. There was no secrecy AS TO THE OCCURANCE OF this meeting. THE MEETING was not publicly NOTICED, nor WAS IT REQUIRED to be, HOWEVER UNIT OWNERS WHO HAVE been following the MAST PURCHASE CLOSELY WERE AWARE, AND/OR REQUESTED the meeting.
5. SEVERAL UNIT OWNERS have objected TO the meeting AS BEING INAPPROPRIATE, but again THE MEETING was CONDUCTED IN COORDINATION WITH our legal counsel and in accordance with the law.
6. The meeting was very positive and our response to MAST's REQUEST FOR AMENDMENT APPROVAL was provided to MAST on Friday Sept. 2nd via our attorneys.
7. WE trust THAT YOU ALL UNDERSTAND that the Board RETAINS A CERTAIN DEGREE OF CONCERN (AND LIABILITY) WITH REGARD TO THE details OF THIS transition and MOST IMPORTANTLY the impact to OUR community.
8. These concerns had been previously expressed to us by the community before this meeting, including BY unit owners who are NOW requesting that we move forward with the AMENDMENT approval without delay.
9. THE BOARD DOES NOT INTEND TO interfere or delay this process; HOWEVER we must insure to the best of our ability that it is done in a PROPER AND legal manner. WE HAVE REQUESTED THAT MAST PROVIDE US ADDITIONAL DETAILS regarding their plans for the transition that will take place.
10. We trust that our community understands that the BOARD is ONLY ATTEMPTING TO PERFORM the due diligence required to complete this process and again IS in no way trying to interfere with the DECISION MADE BY THE MAJORITY OF our community.
11. WE WILL PROVIDE YOU WITH ADDITIONAL INFORMATION AS WE RECEIVE IT.

Respectfully,

THE BOARD OF DIRECTORS
The Amethyst Condominium

We hope you continue enjoying your much needed LABOR DAY weekend wherever this notice finds you.

The Board of Directors
THE AMETHYST
CONDOMINIUMS OF MID BEACH

Exhibit E2

“Closing on the Purchase Contracts. 5313 agree that they shall honor all their respective Purchase Contracts, including any Purchase Contracts entered into or assigned to 5313 on or after the date of this Memorandum, and shall use all commercially reasonable efforts to close on all Purchase Contracts on or before November 21, 2022, subject to reasonable cooperation by the Board and the Association management company, upon the terms and conditions proscribed in each of the Purchase Contracts(s) (Emphasis added).”

2. On or about September 22, 2022, the Memorandum of Understanding between 5313 Acquisitions/Mast Capital, the Amethyst, and the Canero Group was approved for signature at a community board meeting of the Amethyst Association, and the closing date specified therein was set for November 21, 2022 (See Exhibit “A” Executed Memorandum of Understanding) which incorporated the Amendment to the Declaration of Condominium of the Amethyst, a Condominium dated July 19, 2022.
3. The Amendment to the Declaration of Condominium of the Amethyst, a Condominium dated July 19, 2022, and Exhibit to the Memorandum of Understanding (See Exhibit “A”) was then recorded by Defendant in the Official Records of Miami-Dade County, on September 27, 2022, at Official Records Book 33402 Pages 3370-3899.
4. The Amethyst, A Condominium was established by its Declaration of Condominium recorded in the Official Records of Miami-Dade County, on July 13, 1992, at Official Records Book 14485 Pages 1292-1391 wherein in Section 18.2 it states: “The operation of the condominium shall be by the Association which must be a corporation not for profit. The Owners of Units shall be members of the Association. The officers and directors of the Association have a fiduciary relationship to the Unit Owners.”
5. Further, the Amendment to Declaration of Condominium, recorded in the Official Records of Miami-Dade County, on March 1, 2019, at Official Records Book OR Book 31346 Page 2775, limits the ownership of Units within the Association to two (2) Units (See Exhibit

Exhibit E3

The Amethyst C.A. Meeting Minutes

Date: 09/15/2022

Call to Order: Meeting was called to order at 7:05 PM by Onix Padron.

Determination of Quorum: 07:05 PM

All Board members present: Onix Padron

Also, present Sandra Reyes, Property Manager

Proof of Notice of Meeting:

Notice of meeting was posted in the lobby area 48 hrs. in advance. Board recognize meeting notice was posted on time.

Old Business:

No old business.

Tabled: Approval of previous minutes.

New Business: Appointment of New Board Members to Fill Out Current Vacancies.

President of the Board, Onix Padron, will designate two new interim Board Members. Luis Naya accepted the interim position. Robert Bollinger accepted the interim position. The new interim Board Members are Luis Naya and Robert Bollinger.

Onix Padron made a motion to designate Robert Bollinger as interim Vice President, Luis Naya seconded the motion, votes passed unanimously. Robert Bollinger accepted. Motion passed.

Onix Padron made a motion to designate Luis Naya as the interim Treasurer. Robert Bollinger seconded the motion, votes passed unanimously. Luis Naya accepted. Motion carries.

Adjournment:

Motion to adjourn the meeting was done by Luis Naya, seconded by Onix Padron. Meeting adjourned at 7:20 PM

Minutes prepared by: Sandra Reyes

Approved by:

The Amethyst C.A. Meeting Minutes
Emergency Board Meeting

Date: 09/30/2022

Call to Order: Meeting was called to order at 7:02 PM by Luis Naya.

Determination of Quorum: 07:02 PM

All Board members present: Luis Naya, Isela Monteagudo

Also, present Sandra Reyes, Property Manager and Juan Gonzalez from Marsh & McLennan

Proof of Notice of Meeting:

Notice of meeting was posted in the lobby area 48 hrs. in advance. Board recognize meeting notice was posted on time.

Old Business:

No old business.

New Business:

- a. **Update on Insurance Situation – Current status on the insurance renewal was explained by Luis Naya. Juan Gonzalez from Marsh & McLennan was brought in after the Association was dropped by the previous agent after learning of the acquisition of units by Mast Capital. Insurance companies are refusing to finance the insurance premium, as a result, a Special Assessment may be needed to be able to pay for the Insurance premium.**

Open Forum:

- a. **Ramifications of not having insurance – can endanger the negotiations with Mast Capital. By Law, all condominiums are required to have insurance, the building must maintain and comply with all legal requirements.**
- b. **Under the present circumstances the insurance companies will keep 80% of the paid premium if the building was acquired by Mast before the policy expiring.**

Adjournment:

Motion to adjourn the meeting was done by Luis Naya, seconded by Isela Monteagudo.
Meeting adjourned at 7:56 PM

Exhibit F1

Re: Misrepresentation of The Amethyst condominium Association

Jeffrey Giordano <jgiordano@gpssecurity.us>

Wed 8/16/2023 11:03 AM

To: mccarthy@myattorneyservices.com <mccarthy@myattorneyservices.com>; jfarach@shubinbass.com <jfarach@shubinbass.com>; jkatz@shubinbass.com <jkatz@shubinbass.com>; jshubin@shubinbass.com <jshubin@shubinbass.com>
Cc: Naya@nayaarchitects.com <Naya@nayaarchitects.com>; ISELA MONTEAGUDO <IHM23@msn.com>; Robert Bollinger <rbollinger61@yahoo.com>; Onix M. Padron <onix@otvcreative.tv>; ealvarez@miamimanagement.com <ealvarez@miamimanagement.com>; Elaine Vargas <evargas@miamimanagement.com>; Sandra Reyes <sreyes@miamimanagement.com>

Mr. Mccarthy you and the board of Directors consisting of Luis Naya, Islea Monteagudo and Robert Bollinger along with our Association attorney have presented a fraudulent document on an official court filing dated July 13th, 2023 (Local case number 2023-019570-CA-01 State case number 132023CA019570000001), using my wife and I, signature on page 27. This is fraud and I demand it be immediately removed. I signed this document regarding amending the Bylaws on July 28th of 2022. The memo of understanding clearly was drafted after July 28th and was a result of the Meeting that was held without owners' consent with Onix Padron in August of 2022. Intentionally withholding her information from Florida Division of Corporations. This is also documented on Mansfield Bronstein and Stones Invoice number 23056 on October 11, 2022 pertaining to continuing the concealment of the memo remaining confidential from its unit owners. You are presenting this document as if it were one document with our signatures, as if we were aware of this memorandum. Clearly in October our Association attorney Mr. Bronstein on invoices that I previously demonstrated was attempting to conceal this memorandum to Unit owners as late as October. It appears that the Board of Directors, Miami Management, 5313 Collins acquisitions llc. and our Association attorney Mr. Bronstein conspired to draft a fraudulent document between the Canero group, The Amethyst condominium Association. and 5313 Collins acquisitions llc. making it appear that owners' signatures were signing on behalf of knowledge regarding the memo of understanding. I will be filing a complaint with the Miami Dade state attorney's office and the Florida Department of Law enforcement with supporting documents of what appears to be a conspiracy to commit fraud.

Jeffrey S Giordano
President

Giordano Protection Services LLC.
GPS Security/P.I Miami
www.gpssecurity.us
O 305.925.7524
C 305.710.5222

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[Electronic Communications Privacy Act of 1986, 18 U.S.C. 2701(a) and 270

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From: Jeffrey Giordano
Sent: Tuesday, August 15, 2023 3:11 PM
To: mccarthy@myattorneyservices.com <mccarthy@myattorneyservices.com>; jfarach@shubinbass.com <jfarach@shubinbass.com>; jkatz@shubinbass.com <jkatz@shubinbass.com>; jshubin@shubinbass.com <jshubin@shubinbass.com>
Cc: Naya@nayaarchitects.com <Naya@nayaarchitects.com>; ISELA MONTEAGUDO <IHM23@msn.com>; Robert Bollinger <rbollinger61@yahoo.com>; Onix M. Padron <onix@otvcreative.tv>; Jeffrey Giordano <jgiordano@gpssecurity.us>; ealvarez@miamimanagement.com <ealvarez@miamimanagement.com>; Elaine Vargas <evargas@miamimanagement.com>; Sandra Reyes <sreyes@miamimanagement.com>
Subject: Misrepresentation of The Amethyst condominium Association

Mr. McCarthy, I am a unit owner of unit 302 at the Amethyst condominium Association. Please see attached Cease-and-Desist letter as your misrepresentation of our Association does not represent the majority of the unit owners. This is in regard to State case number 132023CA019570000001 Local case number 2023-019570-CA-01. The board is using special assessment moneys of unit owners for legal fees and interfering in real estate sales to benefit contracts for the board of directors and members of the Canero group. This is against the majority of the members of the Associations will. You have provided false and fraudulent claims in your affidavit and are misrepresenting our Association. Please see the attached letter and documentation.

link below:

https://www.dropbox.com/sc/fi/sw5nbqriyl6yk28zdgtdf/Cease-and-Desist-Misrepresentation_scan_1692123567221.pdf?rlkey=zazyco4bk2zonmli7md1fio6&dl=0

Cease and Desist
Misrepresentation_scan_1692123567221.pdf

Shared with Dropbox

www.dropbox.com

It would be inconceivable to think you have not consulted with Mr. Ronnie Bronstein the Associations Attorney who appeared drafted and assisted with the memo of understanding. The attached Florida Bar complaint pending pertains to information that your allegations in the complaint are completely false, misleading, and appear to be intentionally fraudulent.

<https://www.dropbox.com/scl/fi/swgr7p0rtjdxu085w5z2/Florida-Bar-Complaint.pdf?rlkey=ork71vtlv7shpqbjjzb1ptke&dl=0>




Florida Bar Complaint.pdf

Shared with Dropbox

www.dropbox.com

<https://www.dropbox.com/scl/fi/6lrfm3iz9v71r9y25bnpv/Rebutle-Ronnie-File-No.-2024-50-006.pdf?rlkey=m2o0nf0kv35q8uyuijusy2e&dl=0>

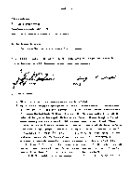


Rebutle Ronnie File No. 2024-50,006.pdf

Shared with Dropbox

www.dropbox.com

<https://www.dropbox.com/scl/fi/qnj56jwb475d7pqwusw9i/File-No.2024-50-006.pdf?rlkey=iihxlsluja1wiakjy6c4zf5d&dl=0>

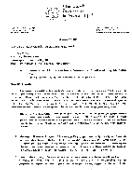


File No.2024-50,006.pdf

Shared with Dropbox

www.dropbox.com

<https://www.dropbox.com/scl/fi/h78qwyjldrfa7u8bu758/bronstein.reply-to-8.10.23-letter.pdf?rlkey=bzvmmh3eis4fmp36ehmti7ln&dl=0>



bronstein.reply to 8.10.23 letter.pdf

Shared with Dropbox

www.dropbox.com

<https://www.dropbox.com/scl/fi/jq4b0h3yn3k3r5evxz05d/Complainant-Response-2-2024-50-0006.pdf?rlkey=8z46apkrb5p2u99258aj2i2u9&dl=0>



Complainant Response 2 2024-50,0006 .pdf

Shared with Dropbox

www.dropbox.com

Jeffrey S Giordano
President

Giordano Protection Services LLC.
GPS Security/P.I Miami
www.gpssecurity.us
O 305.925.7524
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Exhibit F2

Re: **REMINDER > TOMORROW's SPECIAL MEETING 10/11/22 @ 7PM/EST**

Jeffrey Giordano <jgiordano@gpssecurity.us>

Mon 10/10/2022 3:00 PM

To: Onix Padron <onix@otvcreative.tv>

Cc: A-1007 Michael Fleming <MichaelFleming0550@gmail.com>; A-1005 Maria Julia Boue <FoxPar@bellsouth.net>; A-1006 <alfredodiaz713@yahoo.com>; A-1008 Armando Caravia <armandocaravia@gmail.com>; A-1010 Tania Hernandez <htania26@gmail.com>; A-1011 Dr Basilio Christian Garcia Sellek <bsellek@aol.com>; R Pelier <RPelier@pelierlaw.com>; daniel neste <daniel.noste@gmail.com>; A-309 Gloria E. Sanchez <GloriaSan@bellsouth.net>; A-404 Carlos, Maria Del Valle <cdeiv05667@aol.com>; A-405 Terence, Ibis Yarde <terenceyarde@gmail.com>; A-406 Luis M Rossana F Carrasco <carrasco.font4@gmail.com>; John Riccardi <jjriccardi@gmail.com>; A-410 <jb0872@att.net>; A-412 Douglas C Tuttle <dtuttle1@gmail.com>; A-502 Sergio Baradat <Sergio.Baradat@gmail.com>; gdupuis star <gdupuis.star@gmail.com>; A-507 Miriam E Carrillo <mecd110@hotmail.com>; A-508 Rayma Villafane <raymav3@gmail.com>; A-509 Rosalean Inocencio, Albert John Barrios <r_inocencio@bellsouth.net>

📎 5 attachments (3 MB)

LIMITED PROXY.pdf; LIMITED PROXY with Meeting Agenda.pdf; image003.jpg; image004.jpg; image002.jpg;

Vote NO!! I want to see this in writing you will never see this money and you are given away to building. It should be in the amendment we are voting for vote no and we can revisit this when we have a solid written agreement.

Jeff

Sent from my iPhone

On Oct 10, 2022, at 2:57 PM, Onix Padron <onix@otvcreative.tv> wrote:

Dear Amethyst Family,

I hope this email finds you well.

Just a special reminder of tomorrow's meeting and to send in your original signed LIMITED PROXY. I attached here in case you didn't receive but all are needed with the original signature, no copies accepted.

Docu signs are accepted via fax 305-378-0259 > attention Sandra Reyes

For those who missed the meeting where this matter was discussed:

VOTING YES > we can sell our 2 Commercial Units (CU) for \$1,200,000.00 total. These funds will be distributed equally amongst all 120-unit owners. It means, \$10,000 to all units sold to both parties (MAST and/or CANERO). Money will be held in ESCROW for all 120 units until sales begin. When will they these funds be paid out? You can ask your agent regarding this timeline. BUT first we need 51% of our community to vote YES. Otherwise, if we don't reach 51% to pass the selling of these Commercial Units, we won't be able to sell them and we miss the opportunity to get another \$10K (x owner) for these Commercial Units.

I hope this provides clarity for the purpose of this vote.

They'll be clean forms at the meeting for people to sign if they haven't.

I hope to see most of you all at the meeting tomorrow.
7PM @ our meeting room.

Kind regards,
Onix Massiel

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Exhibit F3

The Amethyst C.A. Meeting Minutes
Special Meeting

Date: 10/11/2022

Call to Order: Meeting was called to order at 7:09 PM by Luis Naya.

Determination of Quorum: 07:09 PM

All Board members present: Luis Naya, Robert Bollinger

Also, present Sandra Reyes, Property Manager and Ronnie Bronstein, Association Attorney.

Proof of Notice of Meeting:

Notice of meeting was posted/mailed 14 days in advance. Affidavit available. Board recognize meeting notice was posted on time.

Old Business:

No old business.

New Business:

- a. **Counting of the votes regarding the Sale of the Commercial Units.**
Voting closed at 7:13 pm. Authenticity of the ballots was verified by MMI.
Attorney Ronnie Bronstein proceeded to count the ballots establishing that majority of the Association approved of the Sale of the Commercial Units to Mast Capital. 69 Votes were counted in favor of the sale.

Adjournment:

Motion to adjourn the meeting was done by Luis Naya, seconded by Robert Bollinger. Meeting adjourned at 7:13 PM.

Minutes Prepared by: Sandra Reyes

Approved by:

Exhibit F4



DREAM TEAM LAW PLLC
2701 Ponce De Leon Blvd, Mezzanine
Coral Gables, Florida 33134
Ph: 305-395-4887 Fax: 305-395-7810

05/04/2023

Via CERTIFIED MAIL:
7021 0350 0000 2394 3760

Amethyst Condominium Association
5313 Collins Ave,
Miami, FL 33140
Attention: Legal Department

REQUEST FOR PRESERVATION OF EVIDENCE & COPY OF VIDEO/PHOTOS

Our Client: **Onix Massiel Padron**
Incident Date: **03/20/2023**
Property Address: **5313 Collins Ave, Miami, FL 33140**

Time: **4:00PM**

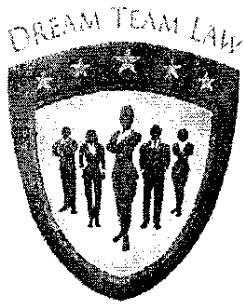
Dear Risk Management Representative:

Please be advised that our firm has been retained by the above-stated individual(s) in a claim for damages resulting from an incident that occurred on or about **03/30/2023** as consequence of a slip and fall that occurred at the subject property. If the premises has liability insurance, please be sure to forward a copy of this letter to your insurance company – lack of notification to your insured may prejudice you greatly. Furthermore, please find enclosed an inquiry sheet regarding insurance coverage for the premises. If you do not have insurance, please contact our office upon receipt of this letter.

We request that you do not alter, change, or modify the area(s) where the incident occurred until we have an opportunity to inspect same. Please keep in mind that failing to preserve the area could also greatly prejudice you as the law may also impose a duty on the premises and its representatives to preserve the area(s) and any items concerning the incident.

It is our understanding that the above-referenced premises may have surveillance video of our client's incident. This letter shall serve as a formal announcement to place your organization on notice that you preserve all evidence in the aforementioned claim.

Any loss, destruction, change of possession, alteration or modification to this video, or any other potential evidence, may be subject to a **Claim for Spoliation of Evidence or Potential Evidence**, which includes sanctions being imposed by a Court. It is your responsibility to ensure the evidence in this case remains intact and unchanged until which time it can be examined by our experts; in other words, you cannot destroy, conceal or alter any paper or electronic files and other data generated by and/or stored on your computers and storage media.



DREAM TEAM LAW PLLC
2701 Ponce De Leon Blvd, Mezzanine
Coral Gables, Florida 33134
Ph: 305-395-4887 Fax: 305-395-7810

In order to avoid spoliation, the above-referenced organization may have to suspend certain normal/scheduled computer maintenance procedures, including but not limited to such procedures as defragmenting hard drives, deleting back-up files, deleting internet cookies, deleting history, and running any "disk clean-up" processes.

We formally request a copy of the above-referenced premise's surveillance video tape of our client's incident along with any corresponding incident report(s). Specifically, we formally request that at least twenty-four (24) hours prior to and one (1) hour subsequent to the subject incident be preserved. Also, please preserve the following items:

- a. The incident report concerning the subject incident, whether or not signed, filled out, and/or reviewed by our client(s);
- b. Any and all complete photographs and depictions of our client(s) and/or the area surrounding entrance area, whether still, video, computer animated, hand-drawn, or in any other form, generated at any time;
- c. Any and all correspondence, reports, opinions, writings of any kind, photographs, video, and/or reports of any type provided to anyone retained by the premises, any other persons assisting the retained individuals, and/or other persons to whom those individuals have subcontracted work in connection with assignments given to the individuals or retained on behalf of the premises;
- d. Any and all notes, diary entries, or timed observations prepared by any investigators, surveillance operators, or any other persons assisting in the investigation of the incident;
- e. Any and all correspondence that governs, dictates, and/or specifies the means, manner, and/or method of the making of any video, photographs, and/or surveillance;
- f. Any and all statements made by our client(s), witnesses, employees, agents, representatives, whether taken contemporaneously or subsequent to the incident;
- g. Any and all insurance policies providing coverage to the premises for any claimed damages, including policies medical payment coverage;
- h. Any and all notices or reports of accidents in or about the premises, even if not similar to the subject incident;
- i. Any and all work schedules, logs, sign-in sheets or the like, indicating the names of the individuals that were present and/or working at or near the incident area(s) on the date of incident, as well as the work schedule for those individuals for the week of the subject incident;
- j. All inspection logs for the date of the incident;
- k. Any and all documents, including correspondence, whether digital or in paper form, relating to any cleaning, maintenance, repairs, modifications, remodeling, construction, or the like for three (3) prior to the incident date;
- l. Any and all documents, including correspondence, whether digital or in paper form, relating to any cleaning, maintenance, repairs, modifications, remodeling, construction, or the like from the incident date through the conclusion of the subject claim;
- m. Any minutes, memoranda, emails, faxes, letters or other documents relating to the subject incident or any potentially dangerous conditions on the premises for the time period of three (3) prior to the incident date;



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2701 Ponce De Leon Blvd, Mezzanine
Coral Gables, Florida 33134
Ph: 305-395-4887 Fax: 305-395-7810

- n. Any and all documents which reference the last time that the area where the incident occurred was cleaned, maintained, repaired, modified, altered, remodeled, painted, waxed, buffed, constructed, or the like for three (3) months prior to the incident date; and
- o. Any and all documents which reference the last time that the area where the incident occurred was cleaned, maintained, repaired, modified, altered, remodeled, painted, waxed, buffed, constructed, or the like from the incident date through the conclusion of the subject claim.

Pursuant to Florida law, if you fail to preserve the evidence listed above, you may be subjected to penalties as determined by the court. Should you have any questions, please do not hesitate to contact our office. Thank you in advance for your anticipated cooperation, and we look forward to hearing from you soon.

Respectfully,
DREAM TEAM LAW

Vanessa E. Dream, Esq.

Vanessa E. Dream, Esquire

VED/dl

Exhibit G



Mansfield
Bronstein
& Stone, LLP
ATTORNEYS AT LAW

500 E. Broward Boulevard, Suite 1400
Fort Lauderdale, Florida 33394
Phone: (954) 601-5600

INVOICE

Invoice # 22876
Date: 09/14/2022
Due Upon Receipt

Maite Calas

18001-002 - Amethyst Condominium - General Corporate Representation

18001-002 - Amethyst Condominium - General Corporate Representation

Services

Date	Timekeeper	Notes	Hours	Total
08/03/2022	RB	Meeting with board regarding authorization for mediation.	0.20	\$55.00
08/08/2022	RB	Review of records request. Review of statutes and declaration. Emails with client.	0.40	\$110.00
08/08/2022	RB	Review of documents received from client regarding work done to units 303 and 312. Review of fire watch and violations. Review of declaration and statutes. Draft letter regarding same.	1.50	\$412.50
08/09/2022	RB	Emails and calls regarding amendment. Review of documents, statutes, declarations, etc. Calls regarding same.	4.10	\$1,127.50
08/09/2022	AW	Review email from RB re. email from Board Member about entity buying up units and trying to improperly terminate condominium. Review attachments to email. Call with RB, DS and GM re. same. Research case law in connection with same. Add'l call from RB. Review add'l emails exchanged between RB and GM re. bribery and intimidation of board members.	1.10	\$275.00
08/10/2022	BK	Reviewed research notes re permissive and mandatory language; reviewed bylaws; researched constitutional law arguments; e-mail with RB re all research and notes.	1.40	\$315.00
08/10/2022	GM	Call with Onix, Ronnie & Ben-Ezra attorneys in preparation for mediation	1.10	\$302.50
08/10/2022	RB	Work on amendment matter. Emails and calls regarding same.	0.50	\$137.50
08/11/2022	BK	Rev e-mail from RB re attempt to record amendment	0.10	\$22.50
08/11/2022	BK	Research re improper recording of amendments	0.20	\$45.00

Exhibit H

35. Unless enjoined, Defendant will continue its piecemeal acquisitions of Units at the Plaintiff without complying with its obligations under the Memorandum of Understanding (See Exhibit "A"); continue to leave the Plaintiff and its Unit Owners, to whom it owes a fiduciary duty, in interminable limbo; and otherwise fail to comply with its obligations under Memorandum of Understanding (See Exhibit "A").
36. The Plaintiff has a high probability of success on the merits as more particularly appears in the Plaintiff's complaint as Plaintiff has performed all its obligations under Memorandum of Understanding (See Exhibit "A").
37. If this temporary injunction is granted, the injury, if any, to the Defendants herein, if final judgment be in their favor, will be inconsiderable and will be adequately indemnified by bond; conversely, if denied, the damage to the Plaintiff would be considerable as its outstanding balance owed would become unrecoverable.
38. The public interest, indeed, will be well served by discouraging the Defendant from ignoring its obligations under the Memorandum of Understanding (See Exhibit "A").
39. All that Plaintiff would ask is this Court order Defendant to cease any further piecemeal acquisitions of Units at the Amethyst without complying with its obligations under the Memorandum of Understanding (See Exhibit "A").

CONCLUSION

The Plaintiff, the Amethyst Condominium Association, Inc., a Florida Non-For Profit Corporation, upon the requisite approval of its "Membership" (the Unit Owners of the Amethyst), approved the Memorandum of Understanding (See Exhibit "A") to allow Defendant to purchase more than two (2) Units of the Plaintiff, an act previously forbidden by its Amended Declaration of Condominium, recorded in the Official Records of Miami-

Exhibit I

Ronald J. Rojas

From: Isela Monteagudo <IHM23@msn.com>
Sent: Wednesday, November 22, 2023 1:51 PM
To: Mario Borda; Ronald J. Rojas; Jordan Kornberg
Cc: Martin McCarthy
Subject: Amethyst Unit 310

I want to update you on my condition as an owner.

I am a senior 74 years old.

I retired a couple of years ago planning to move to the Amethyst and rent out my house to supplement my retirement income.

Due to Mast's contract and subsequent extensions I have not been able to follow my plans.

I am still under contract with you until December 15. I have tried to cooperate with you with everything you have requested.

I can no longer afford to continue paying for 2 properties.

Our Association's attorney will use my situation in the court hearing December 5 unless we close prior.

Thank you for your understanding.

Best Regards,

Isela Monteagudo
Treasurer
The Amethyst Condo Assoc, Inc.

Sent from i-Phone

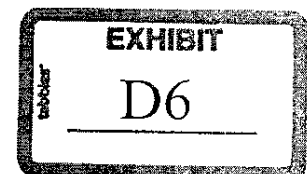


Exhibit J

Dade County, on March 1, 2019, at Official Records Book OR Book 31346 Page 2775, which limits the ownership of Units within the Amethyst Association to two (2) Units (See Exhibit "B"). Plaintiff and its Membership relied upon the Defendant's assertions and voted to approve the Memorandum of Understanding (See Exhibit "A") which allowed for the recordation of the Amendment to the Plaintiff's Declaration of Condominium allowing for the ownership of multiple units by the Defendant to allow its purchase of the ENTIRE building NOT its piecemeal purchase of some units on the path to staging a "hostile takeover" of the Plaintiff to facilitate its goal(s) to slowly dominate the Plaintiff, its Unit Owner's, and to complete its purchase of the Plaintiff's Membership at garage sale prices in continuing violation of the Memorandum of Understanding (See Exhibit "A") wherein the Defendant agreed to close upon its purchase of the Plaintiff's Membership prior to November 21, 2022! The mandated closing date and its most recent extension have expired once again leaving Plaintiff, and its membership to whom it owes a fiduciary duty, in limbo, and necessitating this Court's intercession to restrain Defendant's ongoing actions. Prior to declaring the Parties rights and obligations under the Memorandum of Understanding (See Exhibit "A").

WHEREFORE, Plaintiff, the Amethyst Condominium, a Florida Not for Profit Corporation, respectfully requests this Honorable Court to grant Plaintiff's Amended Expedited Motion for a Temporary Injunction against Defendant enjoining Defendant from further piecemeal purchases of Units of the Plaintiff, the Amethyst Condominium while failing to comply with its obligations under Memorandum of Understanding (See Exhibit "A"), in addition to any further relief this Court deems just and equitable in light of the foregoing.

Exhibit L

Re: Amethyst/Terra -Why not counteroffer

Isela Monteagudo <IHM23@msn.com>

Mon 7/17/2023 10:41 AM

To: Gretchen P Attanasio <gapittman@hotmail.com>
Cc: Miryam Perez <miryamperez@aol.com>; R Pelier <RPelier@pelierlaw.com>; magieamethystmbflc@gmail.com <magieamethystmbflc@gmail.com>; agonzalez@acgonzalezlaw.com <agonzalez@acgonzalezlaw.com>; raweinstein@rcn.com <raweinstein@rcn.com>; cesargranados150@hotmail.com <cesargranados150@hotmail.com>; daniagranados49@yahoo.com <daniagranados49@yahoo.com>; anacarl7@hotmail.com <anacarl7@hotmail.com>; cliff@pavillionagency.com <cliff@pavillionagency.com>; casaverde128@hotmail.com <casaverde128@hotmail.com>; ronaldspeelman@yahoo.com <ronaldspeelman@yahoo.com>; ritaspeelman@yahoo.com <ritaspeelman@yahoo.com>; SEARCHPARADISE@sisters-of-paradise.com <SEARCHPARADISE@sisters-of-paradise.com>; lefajorinc@gmail.com <lefajorinc@gmail.com>; amani@amanitherealtor.com <amani@amanitherealtor.com>; sdrossner@gmail.com <sdrossner@gmail.com>; nicolantonuccipa@yahoo.com <nicolantonuccipa@yahoo.com>; fayruz305@yahoo.com <fayruz305@yahoo.com>; jbauza@hotmail.com <jbauza@hotmail.com>; ambauza@gmail.com <ambauza@gmail.com>

Blah, blah, blah, blah

I have Pedro Rossie's text telling me he will get Bollinger and myself (the 2 other Board members) the \$850,000 if I keep quiet about his crooked deal. I will gladly show it to anyone interested at our next Board Meeting.

No I was not a board member when I signed my individual contract. I paid an attorney \$4,000 to negotiate my contract and to increase the non refundable part of the escrow deposit from \$5,000 to \$65,000. Then when Mast refused to release my money I paid Mr. Pelier, who by the way is offering his services to those who want freedom from Mast, to threaten litigation and that is how I got my money and my peace of mind because now I am free to do with my unit as I wish.

Best Regards,

Isela Monteagudo
Treasurer
The Amethyst Condo Assoc, Inc.

Sent from I-Phone

On Jul 17, 2023, at 10:27 AM, Gretchen P Attanasio <gapittman@hotmail.com> wrote:

Nah. You twisted words to somehow present yourself as a savior. Seller "unity" was MY word. YOUR words were to meet a buyer's offering price. Nice try.

M.Perez was being helpful in the email below, trying to get people "united" with an idea. The 28 are already united. So... what's your beef?? The 28 are honest and holding strong. Why begrudge us our success? Don't you remember... only 28 of us owners had united together while most of the other 92 were in the midst of being pressurized into signing with Mast. At that point, many of us had no other choice but to unite; hence, the famous

28. This is how it happened.... remember Isela?? So don't go twisting things up about unity and the 28's intentions. You (and the rest of the 92) were offered the same opportunity MANY TIMES to join us. All 120 units made their free choice. It could have been called "the ##". Sheesh!

Speaking of unity and intentions, would you please tell us, Isela..... Is it true that you have already received a \$60,000 bonus from mast, and secured a \$750,000 sales contract for yourself? If true, did you care about us other 119 units while you were signing it? Were you a board member then? If so, where was everyone else's \$750,000 contract? Why ONLY you?!!! We could have all been "united" with you. Is this truth Isela? Did you openly tell people about \$60k and \$750k deals of yours? If this is untrue, then please tell us what is untrue about it so we can all understand you better.

As far as your board position goes...your "duty" as another term on the board has nothing to do with orchestrating sale prices . So don't pretend that's somehow your job. People can sell at whatever price they want, whenever they want, AND to whomever they want. They can even get together with whomever they want to talk about things. A free country. Rather, your "duty" as a board member is to take care of our special amethyst building. Our home, our investment. And thank you for your service.

Your comments of trying to make the famous 28 look bad shows poorly upon YOU Isela, not upon us. Especially in light of any sweet deals you orchestrated for yourself. Your attempts to slander Pedro Rossi are unfounded... instead Pedro should receive praise for all he's done for the Amethyst. Bizarre that you attempt to undermine this good man. Did someone ask you to do this to Pedro to create a "seed of doubt" and division amongst us? Good grief!

I'm wondering how is it that so many characters who PUSH for selling our units for dirt cheap kept trying to get onto the board of directors...? Hum? Possibly to influence decisions into the hands of potential buyers. Makes no dayum sense any other way than this. Even Dr Michael Fleming just sold for ONLY \$335,000... even though his sales contract was for \$550k. See folks?!!!! A common tactic is to lure you in to entrap you, and then "stick it to you" at closing. That's what I'm seeing happening. I wonder if Fleming got a bonus too 🙄. The most Mast has ever paid is \$480,000... regardless of the sales price on the contact! I bet they hope that our fear of the cost of legal advice will cause us to just go ahead and finalize the sale to them. They wear you down. Snakes do this to their prey. Get it now?!

Look at Cliff Greenhouse! Once the courts rule that his family is in a "perpetual contract"..... then he's free... and that means that all who signed the same type contract (with double-fanged legal wording - contradictory sections) will be also be free, same as Cliff. Whee!!

Whoever is so eager to sell, at whatever a buyer's offering price, should go sell to Joe blow down the street and get more money and less hassle with a standard Florida real estate contract that closes in 30days. Leave the rest of us in peace.

Go read the news article from a few days ago that was emailed to everyone... it's a nice overview of the situation. Meanwhile, let's enjoy the beach :) 🏖️

PS - I've written this very looong email, so that everyone can see what's happening. No fear... and you'll see the tactics more clearly.

On Jul 16, 2023, at 6:04 PM, Isela Monteagudo <IHM23@msn.com> wrote:

If you think simple Math is a willingness to comply then.....

The 28 can stick together all they wish as long as they don't act detrimentally towards the other 92 owners. Division is the obvious intention of the Terra Group contracts delivered by Pedro Rossie benefitting the 28 by \$300,000 each. If you do not consider that divisive then.....

My duty as a Board Member is to lookout for the entire community of 120 not just the 28.

Best Regards,

Isela Monteagudo
Treasurer
The Amethyst Condo Assoc, Inc.

Sent from I-Phone

On Jul 16, 2023, at 3:51 PM, Gretchen P Attanasio
<gapittman@hotmail.com> wrote:

This type thinking and the willingness to comply is exactly why there are only 28 who stand together. Good luck.

On Jul 16, 2023, at 12:08 PM, Isela Monteagudo
<IHM23@msn.com> wrote:

That would all work out and be great if the developers were willing to pay \$105 million for our property instead of the \$75 million either Mast Capital or Terra Group are offering.

Best Regards,

Isela Monteagudo
Treasurer
The Amethyst Condo Assoc, Inc.

Sent from I-Phone

On Jul 16, 2023, at 8:28 AM, Gretchen P Attanasio <gapittman@hotmail.com> wrote:

Unity! I love it! 🍷

On Jul 15, 2023, at 4:32 PM,
Miryam Perez
<miryamperez@aol.com>
wrote:

To all who received the offers:

Terra and Mast Capital are aware of these offers and they **want** our building!

Lets all counter offer at \$850 K, with 85 K in escrow deposit, closing date on or before 60 days and a contract termination date with a special clause that says: In the event that the buyers does not perform the

11/14/23, 5:05 PM

Mail - Jeffrey Giordano - Outlook

closing for any reason in a
timely matter then the seller
will keep at least 25% of
escrow deposit .

M. Perez

Sent from my iPhone

Exhibit K

Exhibit K

Ronald J. Rojas

From: Isela Monteagudo <IHM23@msn.com>
Sent: Wednesday, November 22, 2023 1:51 PM
To: Mario Borda; Ronald J. Rojas; Jordan Kornberg
Cc: Martin McCarthy
Subject: Amethyst Unit 310

I want to update you on my condition as an owner.

I am a senior 74 years old.

I retired a couple of years ago planning to move to the Amethyst and rent out my house to supplement my retirement income.

Due to Mast's contract and subsequent extensions I have not been able to follow my plans.

I am still under contract with you until December 15. I have tried to cooperate with you with everything you have requested.

I can no longer afford to continue paying for 2 properties.

Our Association's attorney will use my situation in the court hearing December 5 unless we close prior.

Thank you for your understanding.

Best Regards,

Isela Monteagudo
Treasurer
The Amethyst Condo Assoc, Inc.

Sent from I-Phone

