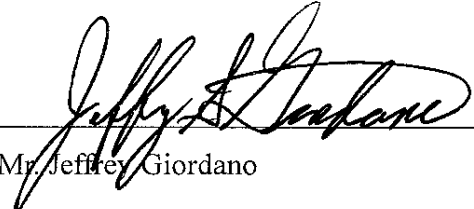


August 10, 2023

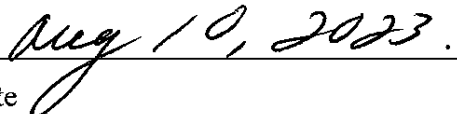
The Florida Bar
651 East Jefferson Street
Tallahassee, Florida 32399-2300
Attn: Mr. Richard W. Coombs, Esq., Bar Counsel

Re: Mr. Ronnie Bronstein
The Florida Bar File 2024-50,5006 (17-A) ("Complaint")

Under penalty of perjury, I declare that the facts contained in the inquiry submitted to The Florida Bar concerning Mr. Bronstein are true, correct, and complete.



Mr. Jeffrey Giordano



Date

Dear Mr. Coombs:

As per Mr. Bronstein's response, attached please find my rebuttal.

1. Mr. Bronstein provides a statement that his office "conveyed truthful information that upon the sale of their unit, they would receive the above noted \$10,000 at their closing." By making this statement Mr. Bronstein's response to the claim inadvertently ends up acknowledging or implying guilt. He had no knowledge or detailed insight of the real estate contracts that were provided in different price ranges to the 120 units. These contracts were confidential to the unit owner and the developer and Mr. Bronstein has no knowledge of said contracts, therefore why would he assure the owners they'd receive compensation. As a result of the unit owners voting on the sale of the commercial units and approving the vote, Mr. Bronstein did not meet a quorum at the meeting and proceeded to fulfill the developer's request on purchasing of the commercial units. Exhibit A lines 9-13,20, and 27 (Mast being the developer 5313 Collins acquisitions) on billing statement, Invoice# 22966. The fact that the Association has filed a civil action against the developer 5313 Collins acquisitions LLC state case number 132023CA019570000001 local case number 2023-019570-CA-01 of the developer not

fulfilling their obligation which is proof of Mr. Bronstein's claims to the unit owners receiving \$10,000 for a yes vote were false.

Mr. Bronstein was aware of Board member and developers involved in real estate fraud and attempting to obtain property from its members through bribery and intimidation as he documented the criminal activity in invoice 22876-line 5 August 09,2022 Exhibit B "Bribery and intimidation of board members." These statements appeared to involve possible RICO act violations involving several entities conspiring to commit fraud.

While there isn't a specific rule in the Florida Bar Rules, the "Crime-Fraud Exception" is a well-established legal principle that applies in many jurisdictions. It allows attorneys to disclose confidential information provided by a client if they believe the communication was made in furtherance of a crime or fraud. Mr. Bronstein had a legal and ethical obligation to report this to authorities instead he continued to plan a meeting behind closed doors with the developer, board of directors and a third party the Canero group that represented 28 units and not the majority of the Association.

2. Mr. Bronstein claims that he is not responsible for filing with the department of state or updating records. Mr. Bronstein's firm was hired by the Amethyst in 2017. His letter of engagement Exhibit C, first page of contract clearly states in paragraph 1 states "reviewing the Associations corporate documents, analyzing the Associations compliance with Florida law." The compliance of filing corporate officers is in violation of state law regarding non-for-profit organizations. He was fully aware of this violation on the original Florida Bar complaint receiving a demand letter listed as exhibit D. He was intentionally participating and conspiring in concealing the identity of board members. Exhibit D Invoice #23143, lines 2-6.
3. 4/5/6 Mr. Bronstein claims that he does not represent an entity called the Canero Group LLC. However, his legal documents prepared prove otherwise. As seen in the original complaint, Exhibit K the memo of understanding clearly states that it is between The Amethyst Condominium Association, Inc., (5313 Collins Acquisitions, LLC. The Developer) and The Canero Group, LLC. ("Canero") with regards to the property located at 5313 Collins Avenue, Miami Beach, Florida 33140. The Canero group consists of 28-unit owners that do not represent most of the Association members and attempted to block the sale if they did not receive premium real estate sale contract amount. This consisted of Onix Padron then President of the Association who Mr. Bronstein assisted and conspired in concealing her identity on Florida corporation documents. Mr. Bronstein drafted the memo of understanding with the benefits of adding the Canero Group on the legal document for financial gain Exhibit A line 10, 26. By concealing the board president and board members identity association members had no one to hold accountable for excessive legal billing and using associations funds for private entity such as the Canero group and conducting private meetings with the developers. Therefore proving Mr.

Bronstein was attempting to conceal the memorandum of understanding containing a 3rd party, the Canero group, as demonstrated on his invoice Exhibit E invoice #23056 line 3 and memo of understanding additional billing Exhibit F line 1.

Timeline of events:

On or around January 2021 representatives of Mast capitol began soliciting owners of The Amethyst condominium to sell their units. The board of Directors at the time were issuing threats that the building needed severe repairs resulting from hurricane Irma in 2017. It was discovered that GCI Consultants specializing in forensic investigations into building damage were hired to assess the damage at the Amethyst condominium. With the recent collapse and devastating impact of the surfside disaster that occurred on June 24th, 2021 had on the entire state of Florida, I submitted a right to inspect records under Florida statute 718.111 to obtain the GCI Consultant inspection report. On July 15th, 2021, Mr. Bronstein's office emailed me advising me that this report was an attorney client privilege blocking my right to inspect, and it would not be released. As seen on Exhibit G the owners have a right to review potential life-threatening reports and decide to continue to occupy their units until repairs are made. Especially after the surfside collapse. The insurance claim for damages exceeded \$5,000,000 indicating life threatening damage to our building. Recently our building experienced severe damage temporary repairs to a main foundation beam that supports the entire building. Once again engineering reports withheld for what appears no other reason than to be released to the city for a building shut down once the Canero group of 28 closes on their units.

On Tuesday August 30th, 2022, even after documenting bribery between the board of directors and the developer from Exhibit B, Mr. Bronstein coordinates and attends a meeting with the developer and board of directors not registered on any Department of State Corporation documents. Generating a memo of understanding and contracts for the Canero group of 28 in the amount of \$850,000 per contract regarding the sale of the group's unit. The Canero group he claims he has no association with but drafts them as a party on the memo of understanding. This meeting was deemed inappropriate by most owners who were denied access to the meeting, but Canero group members were allowed to attend. The information was not disclosed to the residents.

Mr. Bronstein by meeting with Mast Capitol, the board of directors and the Canero group behind closed doors clearly violated 718.112 (2) C 3 this was not a meeting for an attorney to receive or obtain legal advice or prepare for litigation because it involved two other parties that were not associated with the board of directors. Referring to the original complaint exhibit H. A memo from the Association President clearly stated it was to count signatures. (Not legal advice).

September 29th, 2022, Mr. Bronstein attempted to conspire with the board on withholding the insurance proceeds on our building to benefit the developer as demonstrated on his

documentation in Exhibit A line 28 and even attempting to misuse our Insurance claim funds for the developer and applying them towards the board of directors who were withholding their maintenance and assessment payments at the time. Exhibit A line 29 until a demand letter was sent, refer to original complaint Exhibit C. This resulted in the board having to justify their high contracts with the developer. They then had to implement a false assessment to leave funds for the developer as shown in the original complaint Exhibit G. To build up the reserves for the developer with no funds being applied to any of the assessments that were collected.

June 26th, 2023, Requested Right to Inspect documents of the Association.

July 12th, 2023, Florida Bar complaint filed against Mr. Ronnie Bronstein RFA NO. 24-7

July 13th, 2023, Court filing state case number 132023CA019570000001 local case number 2023-019570-CA-01 on July 13th, 2023, the Amethyst VS 5313 Collins acquisitions that the developer defaulted on Memorandum of understanding. Also lists the Canero group of 28 purchase contracts under the memo of understanding that Mr. Bronstein drafted. False claims and allegations make it look like the board is not working with the developer to take over the building.

July 21st, 2023, right to inspect response from Miami management received via email. Several documents missing. Manager Elizabeth acknowledges items missing and that they will be furnished no later than Monday July 24th. July 24th, I received email referring to an extension of more days needed than, than no response

August 1st, 2023, Arbitration notification sent that Mr. Bronstein, Miami Management and The Amethyst Board of Directors that they are deliberately interfering and obstructing me from furnishing supporting documents to the Florida Bar Association by blocking my right to inspect request. I am requesting that this complaint be sent to a grievance committee and allow enough time for me to attend an arbitration hearing on The Association and Mr. Bronstein's refusal to supply supporting right to inspect documents under Florida statute 718.111 as required by law. Exhibit H.

Exhibit A



Mansfield
Bronstein
& Stone, LLP
ATTORNEYS AT LAW

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

INVOICE

Invoice # 22966
Date: 10/12/2022
Due Upon Receipt

Maite Calas

18001-002 - Amethyst Condominium - General Corporate Representation

18001-002 - Amethyst Condominium - General Corporate Representation

Date	Timekeeper	Notes	Hours	Total
09/01/2022	RB	Emails regarding amendment and other matters. Draft agreement with Mast regarding various issues. Call with board.	2.10	\$577.50
09/01/2022	GM	Call with Board & RB. Multiple issues discussed including Mast; commercial units; insurance lawsuit.	1.00	\$275.00
09/01/2022	GM	Draft and send email re:settlement of insurance lawsuit (hurricane)	0.20	\$55.00
09/01/2022	GM	Call with co-counsel Ben-Ezra to let him know about board call last evening regarding settlement. Let him know that Onix approved last eve and awaiting on at least 1 other board approval.	0.30	\$82.50
09/01/2022	GM	Multiple emails to board re:settlement authority.	0.20	\$55.00
09/02/2022	RB	Calls and emails regarding various legal matters. Work on agreement with developer.	1.20	\$330.00
09/07/2022	RB	Calls and emails to bank regarding insurance trustee. Review of bank procedures and condo declaration.	0.50	\$137.50
09/07/2022	GM	Review docs sent by MAST and changes made per RB. Changes to both documents with my comments	0.30	\$82.50
09/07/2022	BK	Researching commercial unit sale issue	1.70	\$382.50
09/08/2022	RB	Conference call with attorney for Mast regarding memorandum of understanding and other issues.	0.70	\$192.50
09/08/2022	BK	Research re sale of commercial unit issues; e-mail to RB re same.	1.00	\$225.00
09/08/2022	AW	Review research provided by BK re. the sale of commercial units.	0.10	\$25.00
09/09/2022	BK	E-mail with RB re sale of commercial unit research	0.10	\$22.50
09/09/2022	RB	Call with Luis Naya. Emails and calls regarding various issues.	0.70	\$192.50

09/12/2022	RB	Calls and emails regarding various legal issues. Work on documents.	1.50	\$412.50
09/13/2022	RB	Calls and emails regarding status of agreement and other legal matters.	0.50	\$137.50
09/13/2022	GM	Call from Ben-Ezra firm to discuss settlement negotiations, trustee bank approval, etc.	0.20	\$55.00
09/14/2022	GM	Call w RB & FPLG (3 attorneys) to discuss settlement & OJ which expires on 9/20. FPLG setting up zoom w board to go over ramifications of not accepting OJ and to update settlement discussions	0.60	\$165.00
09/14/2022	GM	Reply to email from Luis regarding email sent by FPLG.	0.40	\$110.00
09/16/2022	RB	Work on agreement with Mast. Negotiations, emails and calls. Draft notice and proxy for commercial sale. Work on various legal matters for association.	2.50	\$687.50
09/19/2022	GM	Attend zoom meeting with RB/Luis/MBE re: drafting of settlement agreement with CNB as Trustee Bank.	0.50	\$137.50
09/20/2022	RB	Review of settlement agreement. Calls and emails regarding same.	2.10	\$577.50
09/21/2022	RB	Emails regarding settlement. Revise memorandum. Calls regarding same.	0.90	\$247.50
09/22/2022	RB	Prepare for and attend call with board regarding settlement of possible litigation.	0.90	\$247.50
09/23/2022	RB	Calls and emails regarding settlement. Review of documents.	1.10	\$302.50
09/27/2022	RB	Work on memorandum and other matters involving same.	0.50	\$137.50
09/29/2022	RB	Emails regarding various legal issues, including sale of commercial unit and insurance issues.	0.50	\$137.50
09/29/2022	BK	Research re insurance maintenance issues	1.60	\$360.00
09/29/2022	AW	Review email from RB re. whether Association can apply settlement funds from Irma claim to past due balances owned by owners. Research case law re. same to no avail. Exchange emails with RB re. same.	1.00	\$250.00
09/29/2022	RM	Rev of emails re ins renewal matter. Email to RB, BK, and AW re same. Rev of emails re same.	0.20	\$50.00
09/30/2022	RB	Prepare for and attend call regarding insurance. Review of declaration and supporting documentation for use of insurance proceeds and insurance payment.	2.10	\$577.50
09/30/2022	BK	E-mail with RB re continued research needed into insurance issues.	0.10	\$22.50
09/30/2022	BK	Research re insurance proceeds issues	1.40	\$315.00
09/30/2022	AW	Review emails from RB re. issues with insurance and research	0.20	\$50.00

Exhibit B



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 C

Mansfield
Bronstein
& Stone, LLP

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

ARIANE WOLINSKY, ESQ.
ROBERT J. MANSEN, ESQ.
ALEKSANDRA KRAVETS, ESQ.

December 26, 2017

THE AMETHYST CONDOMINIUM ASSOCIATION, INC.
8000 NW 7th Street, Suite 204
Miami, Florida 33126

Re: Engagement of Counsel

To Diana L. Rodriguez:

Thank you for retaining Mansfield, Bronstein & Stone, LLP (the "Firm") in connection with our general corporate and litigation representation of The Amethyst Condominium Association, Inc. (the "Association"). The scope of the Firm's representation will consist of services regarding all general corporate purposes, including, but not limited to reviewing the Association's corporate documents, analyzing the Association's compliance with Florida law, and assisting with litigation matters. Should we do any further work outside of these services, an additional retainer will need to be made. We look forward to serving your needs in this matter and to establishing a mutually satisfactory relationship.

The purpose of this letter is to confirm our engagement as counsel and to provide you with certain information concerning our fees, billing and collection practices, and other terms that will govern our relationship, as you will be responsible for the payment of legal fees and costs incurred. Attached to this letter are our standard terms of engagement, the receipt of which you acknowledge by your signature below. Please review our standard terms of engagement and let me know if you have any questions concerning our policies.

We will bill you on an hourly basis for our services rendered on your behalf. For Association *counseling services*, the Firm typically charges an hourly rate of \$500.00 for the services of David Stone, \$450.00 for the services of the partners of our Firm, \$325.00 for the services of our senior associates, and \$275.00 for the services of our associates; however, we are prepared to reduce the hourly rates as follows: David Stone - \$350.00; Partners - \$275.00; Senior Associates - \$250.00, and Associates - \$225.00.

For Association *litigation matters*, the Firm shall, as an accommodation, charge an hourly rate of \$300.00 for all attorneys, including partners and associates.

Broward Financial Center 500 East Broward Boulevard Suite 1400 Fort Lauderdale, Florida 33394
954.631.5600 (phone) 954.961.4756 (fax)
www.mblawpa.com

Exhibit D



Mansfield
Bronstein
& Stone, LLP
ATTORNEYS AT LAW

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

INVOICE

Invoice # 23143
Date: 12/19/2022
Due Upon Receipt

Maite Calas

18001-002 - Amethyst Condominium - General Corporate Representation

18001-002 - Amethyst Condominium - General Corporate Representation

Date	Timekeeper	Notes	Hours	Total
11/07/2022	RB	Emails regarding closings and continuation of board.	0.30	\$82.50
11/09/2022	BK	E-mail with RB re research issues on board resignations	0.10	\$22.50
11/09/2022	RB	Emails regarding board continuity. Review of declaration and statutes. Communications with attorney for Mast.	0.90	\$247.50
11/10/2022	BK	Research regarding mass board resignation issues	0.90	\$202.50
11/14/2022	BK	Research on board resignation issues; e-mail with RB re same.	0.40	\$90.00
11/14/2022	AW	Review research analysis from BK re. options once board resigns.	0.10	\$25.00
11/14/2022	RB	Emails regarding upcoming closings and transition. Zoom call with board regarding same. Emails with attorney for developer regarding same. Review of by-laws.	1.30	\$357.50
11/14/2022	GM	Call with board & RB	0.60	\$165.00
11/15/2022	RB	Emails and calls regarding various legal issues with association. Review of documents and declaration.	1.30	\$357.50
11/15/2022	GM	Meet with board via zoom to discuss Mast not closing on units, and reversing changes to bylaws, if possible.	0.80	\$220.00
11/16/2022	RB	Emails regarding status of closings and other legal matters.	0.50	\$137.50
			Subtotal	\$1,907.50
			Total	\$1,907.50

Exhibit E



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 F



Mansfield
Bronstein
& Stone, LLP
ATTORNEYS AT LAW

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

INVOICE

Invoice # 23671
Date: 06/07/2023
Due Upon Receipt

Elizabeth Alvarez

18001-002 - Amethyst Condominium - General Corporate Representation

18001-002 - Amethyst Condominium - General Corporate Representation

Date	Timekeeper	Notes	Hours	Total
05/31/2023	PF	Memorandum on MOU and Mast's ability to run for Amethys Board of Directors	1.00	\$2,750.00
			Subtotal	\$2,750.00
			Total	\$2,750.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
23582	05/22/2023	\$110.00	\$0.00	\$110.00

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
23671	06/07/2023	\$2,750.00	\$0.00	\$2,750.00
			Outstanding Balance	\$2,860.00
			Total Amount Outstanding	\$2,860.00

Exhibit G

Fw: Amethyst Condo Reports

Ariane Wolinsky <ariane@mblawpa.com>

Thu 7/15/2021 5:04 PM

To: Jeffrey Giordano <jgiordano@gpssecurity.us>

Cc: Robert Pelier <RPelier@pelierlaw.com>; Ruben Rodriguez <ruben13rodriguez@gmail.com>; 'Tony Valdes' <TValdes@miamimanagement.com>; 'ISELA MONTEAGUDO' <IHM23@msn.com>; Ronnie Bronstein <ronnie@mblawpa.com>; Maite Calas <macalas@miamimanagement.com>; David Stone <david@mblawpa.com>

Good Evening Mr. Giordano,

We are in receipt of your below email. The reports prepared by GCI Consultants, LLC are attorney work product as they were prepared in anticipation of litigation, and they cannot be released to the residents at this time as it could negatively impact the Association's case against the insurance company. GCI was not retained to conduct any structural evaluation of the property nor to make any assessment of the structural integrity of the building. Further, we have reviewed the reports and they make no mention of any structural concerns with the property.

Thank you,

Ariane

Ariane Wolinsky, Esq.

Mansfield, Bronstein & Stone, LLP
Broward Financial Center
500 East Broward Blvd., Suite 1450
Fort Lauderdale, FL 33394

ariane@mblawpa.comwww.mblawpa.com

954.601.5600 (phone) Ext. 305

954.961.4756 (fax)

This e-mail and any files transmitted with it are for the sole use of the intended recipient(s) and may contain information that is proprietary, privileged and/or confidential. Any unauthorized review, use, disclosure or distribution is strictly prohibited. If you are not the intended recipient of this e-mail, please delete this e-mail and any files transmitted with it and notify the sender immediately.

Pursuant to the Fair Debt Collection Practices Act, it is required that we state the following to you: "This is an attempt to collect a debt and any information obtained may be used for that purpose. This is a communication from a debt collector."

*** PLEASE NOTE THAT DUE TO COVID-19 OUR OFFICE IS NOT CURRENTLY ACCEPTING PAYMENTS IN PERSON. Naturally, this is in order to ensure the safety of our clients, and the firm's own employees. Again, please note that our office is NOT currently open to non-employee visitors. Should you come to the office door, regrettably, you will not be allowed to enter for your own protection, as well as for the protection of our staff.

Until further notice, our office is currently ONLY accepting payments by mail (USPS), overnight carrier (Fed-Ex, UPS), or via wired funds. Please note that there is a \$15.00 incoming wire fee for each incoming wire that must be added to your payment for the same to be considered paid-in-full. This charge is exactly the cost imposed to us by

Exhibit H

August 1, 2023

Certified Mail: 7020 0640 0001 8562 2337

Tracking: 9590 9402 7062 4176 43

Official Notice for filing an Arbitration Petition per Florida statute 718.1255

To the Amethyst Condominium Association, Inc. its board of Directors, Mr. Ronnie Bronstein, and Miami Management.

This is to advise that you have violated Florida statute 718.111 (15) denying me access to official records.

I'm advising the Amethyst condominium Association, its board of directors, and our association lawyer, Mr. Ronnie Bronstein, in accordance with Florida Statute 720.311, that this is an official notice that This is advanced notice that I will be applying for an arbitration before taking any civil legal action against the Association, Miami management. Its association attorney in the absence of resolution of the dispute.

The following violation of Florida Statute 718.111, Right to Inspect Records, is the focus of the arbitration request.

Nature of Dispute: Prohibiting inspection of official condominium documents. False assessments imposed on unit owners.

It is my understanding that the Board of Directors is going as far as changing management companies to deliberately destroy and lose the records of the association that its members are entitled to, with the collaboration of Miami Management and the board of Directors. They were provided documentation that there is an active Florida bar complaint, Florida Bar Number 2024-50 006 (17A). The Florida bar committee is considered a legislative committee and is an arm of the Supreme court of Florida. I am advising Miami management company, its managers, our association attorney Mr. Ronnie Bronstein and the board of directors that as per **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 the state is pending or 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 proceedings or investigation, or **(B) Make,** present, or use any record, document, or thing, knowing it to be false.

The board of Directors, its Association attorney and Miami management along with its association managers are actively interfering with me providing supporting documents to the Florida Bar and other governmental agencies. Miami management, board of directors and its association attorney has direct possession of the aged owner balance reports/**Occupant ledgers**, Engineering reports, construction contracts, minutes from the June 2022 annual meeting of elections, listing the new board of directors, the Minutes of the meeting assigning Isela Monteagudo as treasure, the resignation letters of Onix Padron as President, Ron Speelmen Vice President, Noelia Grossi as treasure, and is refusing their release. I will be filing a direct complaint on each manager associated with this obstruction with the DBPR.

Nature of dispute: Failure to produce and inspect official documents of the association. On June 26th, 2023, a right to inspect documents was sent via certified mail 7020 0640 0001 3405 3427 USPS Tracking: 9590 0402 7062 1225 417649. (See attached right to inspect). It was received in Miami Managements office and signed June 29th. After several emails you responded to my request on July 15,2023 with several documents. The majority are unrelated to my request. Elizabeth Alvarez in the email advised the remaining documents will be sent July 24th, 2023. Nothing was sent. I informed you of the documents missing on my email dated July 24th and still have not received a response. I am advising you the following documents are missing:

Regarding my request

- On our association's attorney invoice 22295 only page one was provided. Missing pages 2-5. No detailed statement of account/ billing for invoices for January, Feb, March, April, May. The invoices you provided do not match the special assessment that was implemented on its unit owners for \$50,000 of attorney's fees paid to date of special assessment.
- There are no minutes provided for the meetings appointing the current board, Isela Monteagudo in 2022.
- You have not provided the resignation letters by the previous board members as required by law.
- I have received no signed contracts from vendors only bids. I have received no engineering reports that I have requested. You have provided an altered memo of understanding removing page numbers from the document.
- I have received no age owner balance reports detailing all units in our building of credits or balances due to the association. I provided a copy of what I was referring to as Miami management has this in a court filing. Miami management refers to aged owner balance reports as occupant ledgers. Provide documents as I requested for calendar year of 2023 on all 120 units.
- You have not provided the sales contract on our commercial units. If this does not exist, please state that there are no such records. On your email dated July 24th Elizabeth Alvarez stated there is no sale contract for commercial unit CU1 and CU2 so you are advising there is no real estate contract on any of the common areas belonging to its members. Please state this in writing.
- Minutes of the June 2022 annual meeting and elections.

- I have received no engineering reports on the condition of our building to include the GCI report that was used for the Hurricane Irma claim since it is no longer in litigation. I am requesting all engineering reports pertaining to the damage of our building. This is crucial to ensure the safety of my family while occupying the building. So, there is no error in scanning please state that we have ex amount of engineering reports and list the names of the reports being provided. This is why I am requesting management or the board to sign that each request has been satisfied.

- I have not received the official tax fillings. Please provide the transcripts for IRS filings for 2021 and 2022.

-Real estate sales contract on any common areas of the amethyst with any entity.

Additionally, while on the topic of this dispute in November of 2022 the board of directors imposed a special assessment on its unit owners without any prior bids, amounts not matching its renewals such as insurance renewal 480,000 the budget for 2023 was budgeted in the amount of \$335,683 (This amount far exceeds the amount on the renewal policy and amount that we were budgeted for). reroofing of \$450,000. In the assessment this was regarding a new roof replacement. The new roof was never replaced management recently sent an email regarding minor repairs. Florida statute 718.116

The specific purpose or purposes of any special assessment, including any contingent special assessment levied in conjunction with the purchase of an insurance policy authorized by s. 718.111(11), approved in accordance with the condominium documents shall be set forth in a written notice of such assessment sent or delivered to each unit owner. **The funds collected pursuant to a special assessment shall be used only for the specific purpose or purposes set forth in such notice.** However, upon completion of such specific purpose or purposes, any excess funds will be considered common surplus, and may, at the discretion of the board, either be returned to the unit owners or applied as a credit toward future assessments.

These funds were not used for what it was intended for and were only collected for the purpose of beefing up the reserves for the developer in exchange for large real estate sales agreements for the board of directors and the Caneiro group.

Demand for relief requested:

1. An immediate release of records requested.
2. As per Florida statute 718.111 15 (C) \$50 per day after the 11th day of request up to 10 days following the 11th day of the request, therefore. Entitling me to my June 26th request on June 29th July 13th the excluding holidays on 8 requests being withheld amount to \$4,000 as per Florida statute.
3. All attorney's fees, and arbitration fees related to the denial of my request.
4. Sanctions against Miami management, Elizabeth Alvarez, Elaine Vargas regarding their potential involvement and participation in potential RICO violations in conspiring with

board members, and the association attorney as the documents being withheld are denying me furnishing supporting documents to various governmental agencies on potential criminal and ethical violations.

5. An immediate refund to myself and other unit owners of the special assessment \$8,583.33 as these funds were never used for its listed purpose. The funds were never used on what it was intended for.
6. Immediately provide proper documentation to the state of Florida Division of corporations listing Onix Padron as President, Ron Speelmen Vice President, Noelia Grossi as treasure for their tenure as the board of Directors

Documents enclosed:

1. Right to inspect from June 26, 2023.
2. Proof of Florida bar complaint filing
3. Right to inspect for additional supporting documentation. August 1st 2023

Unit owner Jeffrey S Giordano representative and President of Sherlock Homes Investments LLC. 5313 Collins Avenue unit 302 Miami Beach, Florida 33140 Email: jgiordano@gpssecurity.us Cell phone 305-710-5222

CC: Ronnie Bronstein

Certifies Mail: 7020 0640 0001 3405 3434

Tracking: 9590 9402 7062 1225 4176 56

Jeffrey S Giordano

Owner/ Representative [REDACTED]

5313 Collins Avenue [REDACTED]

Miami, Florida 33140