## DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION DIVISION OF FLORIDA CONDOMINIUMS, TIMESHARES AND MOBILE HOMES

## **CONDOMINIUM / COOPERATIVE COMPLAINT**

INSTRUCTIONS: To expedite your complaint, it is helpful if this form is typewritten or legibly printed, and each question answered fully. If available, attach supporting or clarifying documents and items pertaining to the issues listed in this complaint.

Name <u>Paul R. St. Clair, LCAM</u>	
Mailing Address275 Palm Ave	
Unit No. <u>D-207</u>	
City Jupiter County Palm Beach State FL Zip 33477	
Home telephone number <u>(561) 575-9424</u>	
Cell phone number <u>(585) 730-2612</u>	
E-mail address <u>Paul.St.Clair@Comcast.net</u>	
Complaint filed against: DEVELOPER <u>X</u> ASSOCIATION	
Name Jupiter Bay Condominium Association	
If Developer list principal officer	
If Association list President <u>James Kalec, President</u>	
Mailing address 275 Palm Ave Apt D-105	
City Jupiter County Palm Beach State FL Zip 33477	
Business telephone number ( <u>561) 746-5857</u>	
Has the above been notified of the issues in this complaint? X YES NO	
If yes, what was the method of notification? <u>Attorney letter dated May 30, 2024</u>	
Date declaration of condominium was recorded in public records:	
<u>11 / 18 / 1988</u> County <u>Palm Beach</u>	
If a cooperative, date articles of incorporation were filed with the Secretary of State:	
<u>/</u>	

Have purchaser unit owners elected a majority of the members to the Board of Administration? <u>X</u>YES <u>NO</u>

If you have retained legal counsel regarding the issues listed in this complaint, do you want the division to contact your attorney?  $\underline{X}$  YES  $\underline{NO}$ 

If yes, please provide the following information:

Name of Counsel <u>Ward Damon, Attorneys at Law – Attn: Michael J. Posner</u>

Mailing address <u>4420 Beacon Circle</u>

City <u>West Palm Beach</u> County <u>Palm Beach</u> State <u>FL</u> Zip <u>33407</u>

Business telephone number (561) 842-3000 & (561) 594-1452

a) Has court action been filed regarding any of the allegations in this complaint?

\_\_\_\_\_YES <u>X</u> NO If yes, attach a copy of each complaint filed in court and any subsequent court pleadings.

b) Has a petition for a Declaratory Statement been filed with the division regarding any of the allegations in this complaint? \_\_\_ YES  $\underline{X}$  NO

c) Has a petition for Mandatory Nonbinding Arbitration been filed with the division regarding and of the allegations in this complaint? <u>YES X</u> NO

List each issue. If possible, specify the provisions in the condominium act, or the cooperative act if applicable, which you allege have been violated. Attach additional pages, as needed.

- 1. Official records request sent May 7, 2024, quoting Section 718.111(12)(c)(1) Florida Statures (See attached records request).
- 2. The tenth business day expired on May 21, 2024.
- 3. Ward Damon Attorney letter sent May 30, 2024 (See attached letter).
- 4. As of today (22<sup>nd</sup> business day), the Association has not yet complied with my official records request.

I hereby request the Division of Florida Condominiums, Timeshares and Mobile Homes to review the violation(s) herein alleged. I understand that the division may act on this complaint pursuant to the provisions of Section 718.501, or as applicable Section 719.501, Florida Statutes. I further understand that the division does not represent me or my private interests, and that any action taken by the division will be on behalf of the State of Florida. My signature below certifies the authenticity of this complaint.

	Jupiter Bay Condominium Association
Signature of Complainant	Name of Condominium / Cooperative
6/9/2024	Jupiter Bay Condominium Association
Date	Name of Association