



1655 Palm Beach Lakes Blvd.
Suite 800
West Palm Beach, FL 33401
Phone: 561-227-9344
Fax: 561-909-2114
Greenstein-law.com

April 6, 2015

Via U.S. Mail

Marsha E. Fink
Regal CAM, Inc.
1121 S. Military Trail # 238
Deerfield Beach, FL 33442

**Re: Demand to Cease and Desist Trespassing at Seminole Palms
and Turn Over Property**

Dear Ms. Fink:

We represent Seminole Palms Homeowners Association Inc. (the "Association"). This letter constitutes a formal demand that Regal CAM, Inc. ("Regal") cease and desist trespassing at Seminole Palms (the "Community"), and turn over all property belonging to the Association, and the Community, that is in its possession, custody, or control.

Regal is illegally trespassing at the Community. Among other things, Regal unlawfully changed the locks to the Community's clubhouse (the "Clubhouse"), and Regal's employees have barricaded themselves in the Clubhouse, and excluded the Association's duly elected Board of Directors, and other homeowners, from the Clubhouse. Regal is also surreptitiously holding itself out as the property manager of the Community, when it is not. Additionally, Regal has refused to turn over Community/Association property (which it has no right to legally possess), has removed and converted other Community/Association property for its/Lisa Kallai Hargrove's own use and benefit, and tortuously interfered with the Community's/Association's operations and affairs.

As a result of Regal's illegal trespass, the Greenacres Police Department was called, and police officers dispatched to the Clubhouse. After speaking with Allen Borza, a member of the Board of Directors, and President, of the Association, the police advised Mr. Borza that this was a "civil matter," and recommended that Mr. Borza seek an order from a Judge requiring that the police forcibly remove Regal from the Clubhouse. Be advised that should Regal not cease trespassing, and fail to turn over all Association property in its possession, custody, or control, by April 8, 2015, the Association has authorized us to commence legal proceedings in which we will, among other things, seek an injunction requiring Regal to vacate the Community, and return, all Community/Association property, as well as damages, including attorneys' fees and costs, from both Regal, and you, as its principal.

To the extent Regal, and Ms. Kallai-Hargrove, entered into any agreement which purportedly authorized Regal to perform services for the benefit of the Community, any such agreement is *void ab initio*, as Ms. Kallai-Hargrove had no authority to enter into any such agreement on behalf of



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the Community. To the extent any such agreement exists, we hereby demand that you provide same to the undersigned.

The Association hereby demands that Regal (i) vacate the Community, and turn over all Community/Association property in its possession, custody, and control, including, but not limited to, books and records, bank account statements, keys to all Community/Association property, and agreements entered into with third parties; and (ii) provide an accounting of all activities purportedly taken on behalf of the Community/Association, including, but not limited to, an itemized statement reflecting all expenditures made by Regal relating to the Community, and all payments received by Regal and/or you in connection with same, including from Community/Association bank accounts. If Regal does not comply with the aforementioned by April 8, 2015, the Association has authorized us to commence legal proceeding against Regal, and you, in which the Association will seek injunctive relief, and damages, including attorneys' fees and costs.

GOVERN YOURSELF ACCORDINGLY.

Sincerely,

Richard S. Lubliner