

October 26, 2023

## **Final Investigative Report**

**Case Name:** Jackson, Deborah v PKC2 LLC et al

**Case Number:** 04-23-5251-8/ PC-23-036

### **I. Jurisdiction**

A complaint was filed with HUD on July 27, 2023, alleging that the complainant(s) was injured by a discriminatory act. It is alleged that the respondent(s) was responsible for: Discriminatory terms, conditions, privileges, or services and facilities. It is alleged that the respondent(s)'s acts were based on Race; Color; and Disability. The most recent act is alleged to have occurred on June 05, 2023, and is continuing. The property is located at: 3467 33rd Avenue North, Apt. 9, St. Petersburg, FL 33713. The property in question is not exempt under the applicable statutes. If proven, the allegation(s) would constitute a violation of Sections 804(b) or (f) of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988 and Chapter 70.

The respondent(s) receive no federal funding.

### **II. Parties and Aggrieved Persons**

#### **A. Complainant(s)**

Deborah Jackson  
3467 33rd Avenue North  
Apt. 9  
St. Petersburg, FL 33713

#### **Complainant Representative(s)**

#### **Complainant Allegations**

Complainant Deborah Jackson (CP Jackson) belongs to a class of persons whom the Fair Housing Act (the Act) protects because she is involved in a protected activity. CP Jackson is an African American (black) disabled woman who rents an apartment at 3467 33rd Avenue North Apt. 9 St. Petersburg, FL 33713. The property is owned by PCK2 LLC (RP PC) and managed by All County Property Management and Realty Inc. d/b/a All County Suncoast Property Management (RP All). CP Jackson states that RP All Hs has been treated differently because of her race (African American) and they are trying to force her to move.

CP Jackson has lived in this residence since 2012. CP Jackson states that when RP ALL took over the management of the property, she started receiving notices advising that she had a balance outstanding. CP Jackson contacted RP All and advised them that she has never paid her rent late. On March 23, 2023, CP Jackson hand-delivered an envelope to RP All advising them that she did not owe any funds, as she has been making the payments according to her lease agreement. CP Jackson provided RP All a copy of all her bank statements indicating her payments being made timely. CP Jackson states that RP All does not want her on the property because she is the only African American re residing on the property and they are trying to force her out.

B. Other Aggrieved Persons

C. Respondent(s)

Paracorp Incorporate  
PKC2 LLC  
Registered Agent:  
155 Office Plaza Drive  
1st Floor  
Tallahassee, FL 32301

Sandra Ferrera  
All County Property Management and Realty Inc. d/b/a All County Suncoast Property Management  
Registered Agent:  
1700 66th Street North  
Suite 402  
St. Petersburg, FL 33710

Respondent Representative(s)

Lori Heim  
Bush Ross, P.A.  
1801 North Highland Avenue  
Tampa, FL 33602

Representing: All County Property Management and Realty Inc. d/b/a All County Suncoast  
Property Management

**Notes:**

Anthony Comparetto  
Comparetto Law Firm  
PO Box 1298  
St. Petersburg, FL 33731

Representing: PKC2 LLC

**Notes:**

Respondent Defenses

1. Respondent, All County Property Management and Realty, Inc. d/b/a All County Suncoast Property Management, 1700 66th St. N., Ste 402, St. Petersburg, FL 33710.
2. Jerrad Ferrara, Vice President.
3. None identified in the Complaint.

4. Respondent denies that it has discriminated against Complainant at any time.
5. Respondent denies that it has discriminated against Complainant at any time.
6. Complainant resides at the address identified in the Complaint.
7. Respondent, All County Property Management and Realty, Inc. d/b/a All County Suncoast Property Management, 1700 66th St. N., Ste 402, St. Pete, FL 33710. Respondent has a property management agreement with the owner of the building, PKC2, LLC.
8. Respondent began managing the subject property on 6/21/21. The subject property is located in a 16-unit building. There is no written lease between Complainant and the owner or Respondent. The subject property qualifies for Housing Choice Voucher/Section 8 Program through the St. Petersburg Housing Authority. Attached is the Respondent's complaint payment ledger for the property. This ledger clearly identifies the default in rent that has existed for many months. As a result of this long-standing default, All County posted a Notice of Non-Renewal at the subject property on July 18, 2023. All County was not aware of Complainant's race until this Complaint was filed. All County has not reviewed any of the records of the Owner or the predecessor property management company regarding any information in those records related to the race of any tenant, and All County does not know if such information has been maintained by the Owner or the predecessor property management company.
1. No discrimination of any kind has occurred by Complainant.

10. Housing Choice Voucher/Section 8 Program through the St. Petersburg Housing Authority.

1. All County has not violated any provision of the Fair Housing Act or the Pinellas County Code. All County decided to non-renew Complainant's lease because of a repeated and long-standing default in rent. All County's decision was not based upon race or color.

**PKC2 Defense:**

When my client handed over the management of the property, there were no outstanding balances with Ms. Jackson. Since that time, my client has not been involved in any day-to-day rental issues, whether that be amounts received or owed. My client receives a statement on a monthly basis showing income and expenses, but this does not contain any information on outstanding rent or late payments.

All County have informed my client that they have submitted All County's payment ledger for the subject property; the 3-day notice to the tenant; All County's Notice of Non-renewal of the lease for the subject property; a letter regarding rent abatement from the St. Petersburg Housing Authority; a letter from the St. Petersburg Housing Authority to Complainant.

**ISSUE: DIFFERENT TERMS/CONDITIONS - RACE/NATIONAL ORIGIN**

1. All County will provide this information if available. My client does not have access to this type of information.

2. As All County are responsible for the day-to-day management of the building here is their policy that is in place from them and their response:

All County's policy when there is a default in rent is to issue a 3-day notice to the tenant, and if the rent is not brought current in the required time period, then All County files an eviction action. Regarding the Complainant, All County waited for many months before sending a 3-day notice to Complainant because All County needed additional information from the St. Petersburg Housing Authority regarding payments made on Complainant's behalf. Once All County had the necessary information, All County determined that a non-renewal would be issued as well as a 3-day notice.

2. Per All County, the current Tenants that have received 3-day Notices or Notices of Non-Renewal are: Troy Chatman, 3-day Notice, race unknown; Yasmin Moyer, 3-day Notice, race unknown; Mileidy Morejon, 3-day Notice, race unknown; Antonio Walker, 3-day Notice, race unknown; Frank Figueredo 3-day Notice, race unknown; Deborah Jackson, 3-day Notice and Notice of Non-Renewal, race is African American (according to the allegations of the Complaint); Joseph Cox, 3-day Notice, race unknown; Ted Demopolous, 3-day Notice, race unknown; Pascale Moise, 3-day Notice, race unknown. In the past six months, the following former tenants have received 3-day Notices or Notices of Non-Renewal: Teombai Bryant 3-day Notice and Notice of Non-renewal, race unknown; Christopher Champagne 3-day Notice, race unknown; Fatima Rodriguez, 3-day Notice, race unknown; Danielle Carevic, 3-day Notice and Notice of Non-Renewal, race unknown; Brandon Douglas, 3-day Notice, race African American; Cordez Gatheright, 3-day Notice and then eviction, race unknown.

3. 4. According to All County, the Complainant has never notified them verbally or in writing that she believed she was being discriminated against. My client has never had any communication with the complainant regarding discrimination.

I wish to make my client's position very clear in July 2021, All County Property Management to take over the day-to-day management of the building. Since that time, my client has had no involvement with the management of the building, except as it related to any major expense that may require my authorization. All tenant-related activities, whether that be new or existing tenants, delinquencies, late fees, etc., are handled exclusively by All County.

D. Witnesses

Lavonna Heller  
St. Petersburg Housing Authority  
2001 Gandy Blvd. North  
St. Petersburg, FL 33709

### III. Case Summary

#### A. Interviews

Complainant: Jackson, Deborah  
Date of Interview: June 07, 2023  
Type of Interview: Internet  
Interviewer: Santiago-Rivera, Linda

Complainant Deborah Jackson (CP Jackson) belongs to a class of persons whom the Fair Housing Act (the Act) protects because she is involved in a protected activity. CP Jackson is an African American (black) disabled woman that rents an apartment located at 3467 33rd Avenue North Apt. 9 St. Petersburg, FL 33713. The property is owned by PCK2 LLC (RP PC) and managed by All County Property Management and Realty Inc. d/b/a All County Suncoast Property Management (RP All). CP Jackson states that RP All denied her reasonable accommodation request because they are trying to force her to move because of her race (African American), color (black), and disability.

CP Jackson has lived in this residence since 2012. She states at that time she was granted a reasonable accommodation to make payments on the 3rd of the month based on her social security benefits payment date. CP Jackson states that when RP ALL took over the management of the property, they began to post notices advising that her payment was late. CP Jackson states that when she noticed that she was receiving the notices she contacted RP All and requested a reasonable accommodation to pay the rent on the 3rd of the month. Since 2021, CP Jackson states that they have not granted the reasonable accommodation request and continue to post 3-day notices on her door.

On March 23, 2023, CP Jackson hand-delivered an envelope to RP All advising them that she did not owe any funds, as she has been making the payments according to her prior agreement. CP Jackson provided RP All with a copy of all her bank statements indicating her payments being made on time. CP Jackson believes that the reason why they are doing this is because she is the only disabled African American woman in section 8 residing on the property.

Complainant: Jackson, Deborah  
Date of Interview: August 03, 2023  
Type of Interview: Telephone  
Interviewer: Sarivola, Francis

Ms. Jackson advised me that she does and did not owe any money to the RP. Ms. Jackson reiterated that the RP was mistaken and that the only reason she was given notice to vacate is because she is black.

Respondent Representative: Heim, Lori  
Date of Interview: August 16, 2023  
Type of Interview: Email  
Interviewer: Sarivola, Francis

Please provide detail in where the \$2551.97 is owed. I see the ledger; however, I want to make sure I am reading it right.

This letter is written in response to your request for additional information dated August 16, 2023. After

my client issued the 3-Day Notice, my client received additional information from the Pinellas County Housing Authority which indicated that the amount identified as being due and owing, \$2551.97, was not correct.

My client attempted to discuss this matter with Ms. Jackson, but Ms. Jackson would not respond to my client's outreach. My client did not proceed to file an eviction action, but determined that the inability to communicate with Ms. Jackson, coupled with the attached documents received from the Pinellas County Housing Authority, warranted a non-renewal of the tenancy.

Respondent Representative: Heim, Lori

Date of Interview: August 16, 2023

Type of Interview: Email

Interviewer: Sarivola, Francis

Respondent Representative: Heim, Lori

Date of Interview: September 06, 2023

Type of Interview: Email

Interviewer: Sarivola, Francis

This letter is written in response to your request for additional information dated September 6, 2023. The questions you posed, and my client's responses are set forth below.

1. When, by whom and how were you notified by the Housing Authority that Ms. Jackson was not in default? Please provide correspondence if you have.

Response: All County Suncoast Property Management ("All County") was not notified by the Housing Authority that Ms. Jackson was not in default. After receiving notice of Ms. Jackson's instant claim, All County reviewed the rent ledger and accessed the Housing Authority portal and obtained information regarding a missing payment made to the owner and regarding the abatement payment made by the Housing Authority.

2. Was the decision to non-renew the CP based on difficulty communicating or because her apartment repairs were not done to meet Section 8 standards?

Response: The decision to non-renew Ms. Jackson was based on All County's difficulty in getting Ms. Jackson's assistance to help resolve her outstanding balances.

3. How many other apartments did not meet standard? Please start with this year and provide information for the last three years.

Response: This question is understood to be asking whether any other apartments had a rent abatement by the Housing Authority. The answer is none to All County's knowledge.

4. In the past three years how many persons were evicted or non-renewed because their apartments did not meet standard?

Response: None to All County's knowledge. Further, Ms. Jackson's lease was non-renewed due to difficulty in collecting aged receivables and difficulty in communication and resolving issues with Ms. Jackson. The non-renewal is not related to the abatement by the Housing Authority.

5. What were the races of the persons, if any non-renewed?

Response: This question is understood to be in reference to any persons identified in response to #4, above. The answer is none. Further, All County does not track or maintain information regarding the race of any tenant.

Complainant: Jackson, Deborah

Date of Interview: September 28, 2023

Type of Interview: Email

Interviewer: Sarivola, Francis

Ms. Jackson,

Please answer the following:

1. How did the management company know your race and disability?

1. Did you ever meet any of the staff in person?

3- Does the property have an office?

The Property Management knew of my Race when the vice president Jerrad Ferrera Came in person with Karen and another lady to my apartment and conducted an interior inspection. On July 14, 2021. And when Deborah N Jackson went in person on March 21, 2023 into their Office. And hand delivered and business envelope. To Loree Norfleet, the front desk person. Who signed, dated and wrote the time. Loree Norfleet received it. On a drafted return receipt by Deborah N Jackson. I'm not aware if the Property Management knew of my disability. 2. Yes, I did meet staff in person. In my above noted statements. 3. No there's not an Office on the property.

Respondent Representative: Heim, Lori

Date of Interview: September 28, 2023

Type of Interview: Email

Interviewer: Sarivola, Francis

Please answer the following no later than October 4, 2023:

1. Who is the day-to-day decision maker at the property?

1. How many Section 8 renters does the property have?

1. How and when did the property attempt to contact Ms. Jackson?

2. Is there an office on site?

1. Who is the day-to-day decision maker at the property?

Response: Each process at All County is compartmentalized, including maintenance, leasing, administration, and basic accounting. Each employee in those roles will reach out to the resident or owner regarding daily property management as needed. If an employee cannot make a decision, then Jerrad Ferrara or Sandy Ferrara will step in to assist with the decision. The property owner is also regularly consulted regarding certain decisions concerning the property.

2. How many Section 8 renters does the property have?

Response: The property currently has 1 resident receiving assistance from the Pinellas County Housing Authority.

3. How and when did the property [sic] attempt to contact Ms. Jackson?

Response: This question appears to be asking how and when did All County attempt to contact Ms. Jackson. All County attempted to contact Ms. Jackson beginning July 7, 2021, and each month thereafter, regarding non-payment issues.

4. Is there an office on site?

Response: No, All County does not have an office at the subject property.

Respondent Representative: Heim, Lori

Date of Interview: October 05, 2023

Type of Interview: Email

Interviewer: Sarivola, Francis

1. How and when did the property attempt to contact Ms. Jackson?

Response: The initial attempts to contact Ms. Jackson were not only by phone but by issuing a 3-Day late notice on July 7, 2021, regarding her balance. This notice was placed on her door handle in her absence.

2. Also, could you please let me know the three employees that conducted the property inspection at the CP's apartment on July 14, 2023.

Response: All County does not have record that any employee conducted an inspection in her unit on July 14, 2023. All County did have independent contractors providing maintenance on the property during the month of July. It is also possible that they were resolving any pending issues with housing regarding the abatement.



3. Please provide a sworn affidavit from Lindsey North to include why she notified St. Petersburg Housing Authority caseworker Lavonna Heller on 7/13/2023 that the CP “has been late and accumulating quite a balance. I have attached her ledger. I need to know what steps are needed to non-renew her.”

Response: Attached please see the signed statement from Lindsey North. A sworn statement will be obtained and provided. After many attempts of trying to resolve issues with resident with no resolution, All County was told by housing to non-renew the resident not only for the aged receivables but the difficulty in getting these issues resolved. After receiving this information from the housing authority, All County then issued the no-renewal.

4. Please provide me how the CP is constantly being labeled as delinquent on rent. What additional information did your client receive from the SPHA that showed the CP was not delinquent after this complaint was filed?

Response: The CP was delinquent on rent based upon the information All County received from the owner. CP was told that she had a balance and continued to push blame to housing authority and told All County it needed to reach out to the housing authority. All County told her on many occasions that All County would sit down and assist her with this, but All County needed her full cooperation which was never received. All County also received an abatement letter where the housing authority withheld rent but stated if CP stayed in this unit that she would be responsible to pay rent.

5. Did Ms. North advise the CP’s legal counsel that the CP was not in a lease and was month to month?

Response: All County was told by the housing authority that CP had a contract that automatically renewed with housing and did not need a lease.

6. Was the CP in a lease and if so, please provide a copy?

Response: No, she was not on an active lease provided by owner or All County.

7. How would the SPHA disperse Section 8 funds to your client if no lease was in place? Please see attached image.

Response: All County was told by the housing authority that the paperwork filled out from housing assistance was sufficient in getting the resident renewed as it was a lease addendum they were providing. All County filled out all necessary paperwork less the lease upon time for renewal of resident. All County was told by the housing authority that the housing authority would automatically renew leases and did not need a current lease.

Other Witnesses: Heller, Lavonna

Date of Interview: October 11, 2023

Type of Interview: Email

Interviewer: Sarivola, Francis

Ms. Heller,

My name is Frank Sarivola with the Pinellas County Office of Human Rights, and I am currently investigating a Fair Housing Case filed by Ms. Deborah Jackson v. PCK2 LLC and All County Property

Management and Realty Inc. d/b/a All County Suncoast Property Management. Could you please answer the following questions and provide me with any other insight that you may have. I thank you in advance.

1. Did SPHA ever discover or notify anyone of Ms. Jackson being delinquent on rent?
  
1. Was Ms. Jackson delinquent on rent?
  
1. When Ms. Jackson's apartment failed inspection, was it the fault of Ms. Jackson or the property?
  
1. If it was the property, did they ever try to rectify the deficiencies found during the inspection?
  
1. Did the property ever notify you that Ms. Jackson did not have a lease and was month to month?
  
1. Would you pay the voucher without a standard lease?

Hello Mr. Sarivola,

The landlord did reach out to us and provided a ledger stating Ms. Jackson was behind on rent. Our policy is for us to send the client an unpaid rent letter, and one was sent to her and the landlord. When Ms. Jackson received the letter, she called me about the rent. I informed her the unpaid rent was between her and the landlord. Ms. Jackson supplied our office with letters and documentation regarding the unpaid rent. I have attached a copy of the email and ledger from the landlord and the unpaid rent letter sent from us. After the first year we do not require a lease because the lease is between the tenant and the landlord. We will continue to pay subsidy on a month-to-month basis.

Thank you.

Respondent Representative: Comparetto, Anthony

Date of Interview: October 18, 2023

Type of Interview: Internet

Interviewer: Sarivola, Francis

Did your client Mr. Craft ever tell All County that Ms. Jackson was delinquent in rent when they took over management?

Ms. Jackson was not delinquent in her rent with me at the time All County took over Property Management responsibilities.

Please excuse grammar and spelling message sent using iPhone auto dictate for speedy response.

Anthony J. Comparetto, Esq.

Comparetto Law Firm

Complainant: Jackson, Deborah  
Date of Interview: October 23, 2023  
Type of Interview: Email  
Interviewer: Sarivola, Francis

Complainant: Jackson, Deborah  
Date of Interview: October 23, 2023  
Type of Interview: Email  
Interviewer: Sarivola, Francis

On what date did Gulf coast Legal contact All County?

Mr. Frank Sarivola, Gulf coast Legal Aid handled the potential eviction process. Because I was receiving the Three Day To Pay Rent Or Give Possession Notices so frequently. Sharicka Robertson, LaVonna Heller supervisor told me too contact Gulf coast Legal Aid. After I told her about me being harassed. And the number of Three Day To Pay Rent Or Give Possession Notices. That was being placed on my doorknob and the fact. I owed no money to All County Suncoast Property Management.

Complainant: Jackson, Deborah  
Date of Interview: October 23, 2023  
Type of Interview: Email  
Interviewer: Sarivola, Francis

Ms. Jackson,

I am getting close to making a decision in your case, could you please answer the following as quick as you can. You may have sent it already in all of the screenshots you sent, however I cannot seem to find it if it was sent. Please let me know why All County would say that you were non communicative during the process. Did you ever refuse to talk to them or refuse to respond to their communication? Did you take their phone calls? Please provide.

To Mr. Frank Sarivola, I never not once didn't communicate. With All County Suncoast Property Management. I've called and documented the dates and times. As well as Deborah N Jackson went in person. To All County Suncoast Property Management office. On March 21, 2023. All County Suncoast Property Management has been the individuals not communicating. Hanging up the phone, No return phone calls. Only placing Three Day To Pay Rent Or Give Possession Notices on my doorknob. My Housing Specialist LaVonna Heller can also inform you about the non-communication she received as well. From All County Suncoast Property Management again lies. All County Suncoast Property Management. Lindsey North was reached after several times. Marie Harrell my attorney with Gulf coast Legal. Called me on July 24, 2023 and informed me That Lindsey North wanted Deborah N Jackson to make a appointment. To come into the office to work out a payment plan in regard to Deborah N Jackson paying monies too. ALL COUNTY SUNCOAST PROPERTY MANAGEMENT. I emailed Marie Harrell on July 24, 2023 at 4: 53pm. And stated in my email that going into their office was not in my best interest. Because Deborah N Jackson didn't owe All County Suncoast Property Management any money at all. So what would the purpose be. I

had been trying everything that I could do to resolve this issue of money owed. From February 24,2023 to October 10,2023. And acquired two attorneys, Janie Inverse, Marie Harrell. As well as my Housing Specialist. I suffer from High blood pressure and other illnesses. This has been a brutal situation, that Deborah N Jackson shouldn't have not had to go through with at all.

Respondent Representative: Heim, Lori

Date of Interview: October 25, 2023

Type of Interview: Telephone

Interviewer: Sarivola, Francis

Spoke to counsel via phone concerning email that said CP owed the same amount on 8/7/23 as 8/3/23, \$75.00 late charge and \$50.00 posting fee for May 2023. SPHA owed the remaining amount of \$343.00 for the abatement decision in May. I advised counsel that RP All had fixed the HQS items and paid for reinspection and were later paid by the SPHA. I asked how CP could owe anything? Counsel could not supply an answer and was only concerned about how I was looking at discriminatory behavior when her client had bad bookkeeping.

#### B. Documents

Nature of Document: Rent ledger for CP

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: August 11, 2023

Date Obtained: August 11, 2023

Rent ledger for CP

Nature of Document: Property Management Agreement

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: August 11, 2023

Date Obtained: August 11, 2023

Property Management agreement between all county and owner

Nature of Document: Tenant roll

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: August 11, 2023

Date Obtained: August 11, 2023

Tenant roll

Nature of Document: Position Statement of RP

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: August 11, 2023

Date Obtained: August 11, 2023

## Position statement of respondent and RFI

Nature of Document: RP Suncoast response to RFI

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: August 11, 2023

Date Obtained: August 11, 2023

## Response to RFI

1. All County Property Management & Realty, Inc. d/b/a All County Suncoast Property Management (“All County”).
2. All County manages the 16-unit building pursuant to a written property management agreement with the owner.
3. All County’s management agreement with the owner provides All County with authority to make certain decisions regarding the subject property. All County’s CEO is Sandra Ferrara; the Vice President is Jerrad Ferrara.
4. The subject property receives funding from the St. Petersburg Housing Authority for the Housing Choice Voucher/Section 8 Program.
5. None. All County has been in business for close to 30 years.
6. Attached is the management agreement with the owner which also specifically addresses compliance with the Fair Housing Act. Exhibit “A.”
7. All County’s Answer to the Complaint and Written Position Statement is enclosed with this Response to Request for Information, which has attached to it All County’s payment ledger for the subject property; the 3-day notice to the tenant; All County’s Notice of Non-renewal of the lease for the subject property; a letter regarding rent abatement from the St. Petersburg Housing Authority; a letter from the St. Petersburg Housing Authority to Complainant.

## ISSUE: DIFFERENT TERMS/CONDITIONS - RACE/NATIONAL ORIGIN

1. See attached list.
2. All County’s policy when there is a default in rent is to issue a 3-day notice to the tenant, and if the rent is not brought current in the required time period, then All County files an eviction action. Regarding the Complainant, All County waited for many months before sending a 3-day notice to Complainant because All County needed additional information from the St. Petersburg Housing Authority regarding payments made on Complainant’s behalf. Once All County had the necessary information, All County determined that a non-renewal would be issued as well as a 3-day notice.
3. Current Tenants that have received 3-day Notices or Notices of Non-Renewal are: Troy Chatman, 3-day Notice, race unknown; Yasmin Moyer, 3-day Notice, race unknown; Mileidy Morejon, 3-day Notice, race unknown; Antonio Walker, 3-day Notice, race unknown; Frank Figueredo 3-day Notice, race unknown; Deborah Jackson, 3-day Notice and Notice of Non-Renewal, race is African American (according to the allegations of the Complaint); Joseph Cox, 3-day Notice, race unknown; Ted Demopolous, 3-day Notice,

race unknown; Pascale Moise, 3-day Notice, race unknown. In the past six months, the following former tenants have received 3-day Notices or Notices of Non-Renewal: Teombai Bryant 3-day Notice and Notice of Non-renewal, race unknown; Christopher Champagne 3-day Notice, race unknown; Fatima Rodriguez, 3-day Notice, race unknown; Danielle Carevic, 3-day Notice and Notice of Non-Renewal, race unknown; Brandon Douglas, 3-day Notice, race African American; Cordez Gatherright, 3-day Notice and then eviction, race unknown.

4. Complainant has never notified All County verbally or in writing that she believed she was being discriminated against. The only communication between All County and the Complainant regarding any issue related to the Complaint is a discussion between Complainant and All County regarding the default in rent. In particular, Loree Norfleet, an employee of All County, spoke with Complainant many times regarding the outstanding rent balance. Complainant did not mention her race to Ms. Norfleet (who is also African American) at any time during these conversations, nor did Complainant ever stated she believed she was being discriminated against.

5. None. All County has been in business for close to 30 years.

Nature of Document: Copy of 3 day notice

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: August 11, 2023

Date Obtained: August 11, 2023

Copy of 3 day notice

Nature of Document: Email from RP All to CP Account in arrears

Who Provided: CP

How Transmitted to HUD: email

Date of Document: April 14, 2023

Date Obtained: August 14, 2023

4/14/23 Email from RP All to CP Account in arrears

Nature of Document: P/S Rebuttal CP

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 14, 2023

Date Obtained: August 14, 2023

CP writes that RP is an African American woman who received a notice of inspection for her apartment from RP Suncoast. During the inspection CP was asked if there were any issues that needed to be taken care of. CP advised RP that toilets needed repair and the garbage disposal did not work. CP advises that she received seven 3 day notices that she was in arrears. CP disputes she is in arrears.

CP alleges RP claims she is not in a lease which she deems as false. CP alleges there is a lease amendment effective 10/1/2022 and she does not have to recertify until 10/1/2023.

Nature of Document: Signed acceptance by RP All from CP for correspondence

Who Provided: CP

How Transmitted to HUD: email

Date of Document: March 21, 2023

Date Obtained: August 14, 2023

To Mr. Frank Sarivola this is the return receipt. That I Deborah N Jackson drafted. And took too All County Suncoast Property Management office. Located at 1700 66th Street North Suite #402. In which the man that came to inspect my apartment was present in the office at the time. And looked at me as I entered the office glass door. To also prove All County Suncoast Property Management knew I was indeed African American.

Nature of Document: Email from RP All to CP Account in arrears

Who Provided: CP

How Transmitted to HUD: email

Date of Document: April 03, 2023

Date Obtained: August 14, 2023

4/3/23 email from RP All to CP account in arrears

Nature of Document: Late fee notice letter

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 03, 2023

Date Obtained: August 14, 2023

8/3/2023 Late Fee Notice letter from RP All to CP advising account in arrears and late fees

Nature of Document: Email from RP All to CP Account in arrears

Who Provided: CP

How Transmitted to HUD: email

Date of Document: May 03, 2023

Date Obtained: August 14, 2023

5/3/23 email from RP All to CP reference account in arrears

Nature of Document: Email from RP All to CP

Who Provided: CP

How Transmitted to HUD: email

Date of Document: July 03, 2023

Date Obtained: August 14, 2023

Screenshot of email from RP All to CP advising account is in arrears

Nature of Document: Section 8 certification letter

Who Provided: CP

How Transmitted to HUD: email

Date of Document: September 02, 2021

Date Obtained: August 14, 2023

Section 8 certification letter

Nature of Document: Three day notice picture

Who Provided: CP

How Transmitted to HUD: email

Date of Document: April 07, 2023

Date Obtained: August 14, 2023

4/7/23 three day notice

Nature of Document: Three day notice picture

Who Provided: CP

How Transmitted to HUD: email

Date of Document: July 05, 2023

Date Obtained: August 14, 2023

7/5/23 three day notice

Nature of Document: Three day notice picture

Who Provided: CP

How Transmitted to HUD: email

Date of Document: June 05, 2023

Date Obtained: August 14, 2023

6/5/23 three day notice

Nature of Document: Three day notice picture

Who Provided: CP

How Transmitted to HUD: email

Date of Document: April 04, 2023

Date Obtained: August 14, 2023

4/4/23 Three day notice

Nature of Document: Three day notice picture

Who Provided: CP

How Transmitted to HUD: email

Date of Document: March 15, 2023

Date Obtained: August 14, 2023

3/15/23 Three day notice

Nature of Document: Three day notice picture

Who Provided: CP

How Transmitted to HUD: email

Date of Document: March 06, 2023

Date Obtained: August 14, 2023

3/6/23 three day notice



Nature of Document: CP letter to SPHA Lavonna Heller disputing unpaid rent allegations page 6

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 14, 2023

Date Obtained: August 14, 2023

CP letter to SPHA Lavonna Heller disputing unpaid rent allegations page 6

Nature of Document: Notice of Non Renewal

Who Provided: CP

How Transmitted to HUD: email

Date of Document: July 18, 2023

Date Obtained: August 14, 2023

Notice of Non Renewal

Nature of Document: Section 8 certification letter

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 14, 2023

Date Obtained: August 14, 2023

Section 8 certification letter

Nature of Document: CP letter to Lavonna Heller

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 03, 2023

Date Obtained: August 14, 2023

CP letter to Lavonna Heller

Nature of Document: Rent ledger from CP 2

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 14, 2023

Date Obtained: August 14, 2023

Rent ledger from CP 2

Nature of Document: Rent Ledger from CP

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 14, 2023

Date Obtained: August 14, 2023

Rent Ledger from CP

Nature of Document: Lindsey North email to Lavonna Heller alleging delinquency and seeking steps to non-renew CP

Who Provided: CP  
How Transmitted to HUD: email  
Date of Document: July 13, 2023  
Date Obtained: August 14, 2023

Lindsey North email to Lavonna Heller alleging delinquency and seeking steps to non-renew CP

Nature of Document: CP letter to SPHA Lavonna Heller disputing unpaid rent allegations  
Who Provided: CP  
How Transmitted to HUD: email  
Date of Document: August 03, 2023  
Date Obtained: August 14, 2023

CP letter to SPHA Lavonna Heller disputing unpaid rent allegations

Nature of Document: CP Letter to SPHA Lavonna Heller disputing alleged unpaid rent  
Who Provided: CP  
How Transmitted to HUD: email  
Date of Document: August 03, 2023  
Date Obtained: August 14, 2023

CP Letter to SPHA Lavonna Heller disputing alleged unpaid rent

Nature of Document: Three day notice picture  
Who Provided: CP  
How Transmitted to HUD: email  
Date of Document: July 07, 2021  
Date Obtained: August 14, 2023

Three day notice picture 7/7/2021

Nature of Document: CP letter to SPHA Lavonna Heller disputing unpaid rent allegations  
Who Provided: CP  
How Transmitted to HUD: email  
Date of Document: August 03, 2023  
Date Obtained: August 14, 2023

CP letter to SPHA Lavonna Heller disputing unpaid rent allegations

Nature of Document: CP letter to Lavonna Heller screenshot 5  
Who Provided: CP  
How Transmitted to HUD: email  
Date of Document: August 03, 2023  
Date Obtained: August 14, 2023

CP letter to SPHA Lavonna Heller disputing alleged rent non-payment page 1

Nature of Document: Rebuttal to Position Statement screenshot 4  
Who Provided: CP  
How Transmitted to HUD: email

Date of Document: August 14, 2023

Date Obtained: August 14, 2023

Rebuttal to P/S screenshot

Nature of Document: Notice of Inspection screenshot 3

Who Provided: CP

How Transmitted to HUD: email

Date of Document: July 08, 2021

Date Obtained: August 14, 2023

Notice of Inspection screenshot 3

Nature of Document: Rebuttal to Position Statement screenshot 2

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 14, 2023

Date Obtained: August 14, 2023

screenshot of handwritten rebuttal concerning repairs needed

Nature of Document: Rebuttal to Position Statement screenshot

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 14, 2023

Date Obtained: August 14, 2023

CP hand written rebuttal screenshot concerning inspection of apartment

Nature of Document: Screenshot of Jerrad Ferrera

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 15, 2023

Date Obtained: August 15, 2023

screenshot of Jerrad Ferrera identifying him as person who inspected CP apartment

To Mr. Sarivola this is the man. That conducted the inspection of the apartments. On July 14,2021 between 10:00am and 12:00 pm And came in my apartment with two women.

Nature of Document: Example of Incorrect Accounting

Who Provided: CP

How Transmitted to HUD: email

Date of Document: April 01, 2023

Date Obtained: August 15, 2023

This was screenshot by Deborah N Jackson. Stating Deborah N Jackson paid 161.16.On All County Suncoast Property Management. Website where tenants make rent payments. Dated April 1,2023.

Nature of Document: Screenshot after Rent payment

Who Provided: CP

How Transmitted to HUD: email

Date of Document: April 01, 2023

Date Obtained: August 15, 2023

This is a Screen shot of the correct rent payment. Right after the payment was made by Deborah N Jackson. Showing Deborah N Jackson didn't. Pay rent on April 1, 2023. But paid on April 3, 2023.

Nature of Document: RP PCK2 P/S and RFI Response

Who Provided: Attorney Comparetto

How Transmitted to HUD: email

Date of Document: August 18, 2023

Date Obtained: August 18, 2023

Complainant: Jackson, Deborah

Respondent: PKC2 LLC

Charge No.: PC-23-036

HUD No.: 04-23-5321-8

1. Hartford West Apartments 3467 33rd Ave N St Petersburg, FL 33713

PKC2 LLC – A Florida Limited Liability Company

2. A total of 16 units, consisting of 9 1BR/1BTH, 6 2BR/1BT, and 1 Studio.

3. Philip & Karin Craft are the Managers of the LLC. All County Suncoast Property Management are responsible for the Property Management of the Building.

4. The only Govt. Funding is from the St. Petersburg Housing Authority for the Housing Choice Voucher/Section 8 Program.

5. The property has never previously had any Fair Housing complaints made against it.

6. All County submitted rules and policies as an attachment. I am waiting for those documents and will supplement them when received.

7. When my client handed over the management of the property, there were no outstanding balances with Ms. Jackson. Since that time, my client has not been involved in any day-to-day rental issues, whether that be amounts received or owed. My client receives a statement on a monthly basis showing income and expenses, but this does not contain any information on outstanding rent or late payments.

All County have informed my client that they have submitted All County's payment ledger for the subject property; the 3-day notice to the tenant; All County's Notice of Non-renewal of the lease for the

subject property; a letter regarding rent abatement from the St. Petersburg Housing Authority; a letter from the St. Petersburg Housing Authority to Complainant.

**ISSUE: DIFFERENT TERMS/CONDITIONS - RACE/NATIONAL ORIGIN**

1. All County will provide this information if available.

My client does not have access to this type of information.

2. As All County are responsible for the day-to-day management of the building here is their policy that is in place from them and their response:

All County's policy when there is a default in rent is to issue a 3-day notice to the tenant, and if the rent is not brought current in the required time period, then All County files an eviction action. Regarding the Complainant, All County waited for many months before sending a 3-day notice to Complainant because All County needed additional information from the St. Petersburg Housing Authority regarding payments made on Complainant's behalf. Once All County had the necessary information, All County determined that a non-renewal would be issued as well as a 3-day notice.

3. Per All County, the current Tenants that have received 3-day Notices or Notices of Non-Renewal are: Troy Chatman, 3-day Notice, race unknown; Yasmin Moyer, 3-day Notice, race unknown; Mileidy Morejon, 3-day Notice, race unknown; Antonio Walker, 3-day Notice, race unknown; Frank Figueredo 3-day Notice, race unknown; Deborah Jackson, 3-day Notice and Notice of Non-Renewal, race is African American (according to the allegations of the Complaint); Joseph Cox, 3-day Notice, race unknown; Ted Demopolous, 3-day Notice, race unknown; Pascale Moise, 3-day Notice, race unknown. In the past six months, the following former tenants have received 3-day Notices or Notices of Non-Renewal: Teombai Bryant 3-day Notice and Notice of Non-renewal, race unknown; Christopher Champagne 3-day Notice, race unknown; Fatima Rodriguez, 3-day Notice, race unknown; Danielle Carevic, 3-day Notice and Notice of Non-Renewal, race unknown; Brandon Douglas, 3-day Notice, race African American; Cordez Gatheright, 3-day Notice and then eviction, race unknown.

4. According to All County, the Complainant has never notified them verbally or in writing that she believed she was being discriminated against. My client has never had any communication with the complainant regarding discrimination. I wish to make my client's position very clear in July 2021, All County Property Management to take over the day-to-day management of the building. Since that time, my client has had no involvement with the management of the building, except as it related to any major expense that may require my authorization. All tenant-related activities, whether that be new or existing tenants, delinquencies, late fees, etc., are handled exclusively by All County.

Nature of Document: REBUTTAL of PKC#2 LLC

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 23, 2023

Date Obtained: August 23, 2023

This is Deborah N Jackson Rebuttal of PKC#2LLC with. Deborah N Jackson documentation. And supporting documents of evidence. HAP Contract and Lease Agreements 2.7 Three Day Notices, and Ledger from Lindsey North to. Lavonna Heller. Deborah N Jackson. Housing Specialist.

Nature of Document: REBUTTAL of PKC#2 LLC page 4

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 23, 2023

Date Obtained: August 23, 2023

REBUTTAL of PKC#2 LLC page 4

Nature of Document: REBUTTAL of PKC#2 LLC page 3

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 23, 2023

Date Obtained: August 23, 2023

REBUTTAL of PKC#2 LLC page 3

Nature of Document: REBUTTAL of PKC#2 LLC page 2

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 23, 2023

Date Obtained: August 23, 2023

REBUTTAL of PKC#2 LLC page 2

Nature of Document: Response to RFI admitting CP did not owe rent

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: August 24, 2023

Date Obtained: August 24, 2023

This letter is written in response to your request for additional information dated August 16, 2023. After my client issued the 3-Day Notice, my client received additional information from the Pinellas County Housing Authority which indicated that the amount identified as being due and owing, \$2551.97, was not correct.

My client attempted to discuss this matter with Ms. Jackson, but Ms. Jackson would not respond to my client's outreach. My client did not proceed to file an eviction action, but determined that the inability to communicate with Ms. Jackson, coupled with the attached documents received from the Pinellas County Housing Authority, warranted a non-renewal of the tenancy.

Nature of Document: Response to RFI  
Who Provided: Attorney Heim  
How Transmitted to HUD: email  
Date of Document: August 24, 2023  
Date Obtained: August 24, 2023

This letter is written in response to your request for additional information dated August 16, 2023. After my client issued the 3-Day Notice, my client received additional information from the Pinellas County Housing Authority which indicated that the amount identified as being due and owing, \$2551.97, was not correct.

My client attempted to discuss this matter with Ms. Jackson but Ms. Jackson would not respond to my client's outreach. My client did not proceed to file an eviction action, but determined that the inability to communicate with Ms. Jackson, coupled with the attached documents received from the Pinellas County Housing Authority, warranted a non-renewal of the tenancy.

Nature of Document: Response to RFI  
Who Provided: Attorney Heim  
How Transmitted to HUD: email  
Date of Document: September 13, 2023  
Date Obtained: September 13, 2023

This letter is written in response to your request for additional information dated September 6, 2023. The questions you posed, and my client's responses are set forth below.

1. When, by whom and how were you notified by the Housing Authority that Ms. Jackson was not in default? Please provide correspondence if you have.

Response: All County Suncoast Property Management ("All County") was not notified by the Housing Authority that Ms. Jackson was not in default. After receiving notice of Ms. Jackson's instant claim, All County reviewed the rent ledger and accessed the Housing Authority portal and obtained information regarding a missing payment made to the owner and regarding the abatement payment made by the Housing Authority.

2. Was the decision to non-renew the CP based on difficulty communicating or because her apartment repairs were not done to meet Section 8 standards?

Response: The decision to non-renew Ms. Jackson was based on All County's difficulty in getting Ms. Jackson's assistance to help resolve her outstanding balances.

3. How many other apartments did not meet standard? Please start with this year and provide information for the last three years.

Response: This question is understood to be asking whether any other apartments had a rent abatement by the Housing Authority. The answer is none to All County's knowledge.

4. In the past three years how many persons were evicted or non-renewed because their apartments did not meet standard?

Response: None to All County's knowledge. Further, Ms. Jackson's lease was non-renewed due to difficulty in collecting aged receivables and difficulty in communication and resolving issues with Ms. Jackson. The non-renewal is not related to the abatement by the Housing Authority.

5. What were the races of the persons, if any non-renewed?

Response: This question is understood to be in reference to any persons identified in response to #4, above. The answer is none. Further, All County does not track or maintain information regarding the race of any tenant.

Nature of Document: Response to RFI

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: October 04, 2023

Date Obtained: October 04, 2023

1. Who is the day-to-day decision maker at the property?

Response: Each process at All County is compartmentalized, including maintenance, leasing, administration, and basic accounting. Each employee in those roles will reach out to the resident or owner regarding daily property management as needed. If an employee cannot make a decision, then Jerrad Ferrara or Sandy Ferrara will step in to assist with the decision. The property owner is also regularly consulted regarding certain decisions concerning the property.

2. How many Section 8 renters does the property have?

Response: The property currently has 1 resident receiving assistance from the Pinellas County Housing Authority.

3. How and when did the property [sic] attempt to contact Ms. Jackson?

Response: This question appears to be asking how and when did All County attempt to contact Ms. Jackson. All County attempted to contact Ms. Jackson beginning July 7, 2021, and each month thereafter, regarding non-payment issues.

4. Is there an office on site?

Response: No, All County does not have an office at the subject property.

Nature of Document: Response to RFI

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: October 11, 2023

Date Obtained: October 11, 2023

This letter is written in response to your request for additional information dated October 5, 2023. The questions you presented and All County Suncoast Property Management's ("All County") responses are set forth below.

1. How and when did the property attempt to contact Ms. Jackson?



Response: The initial attempts to contact Ms. Jackson were not only by phone but by issuing a 3-Day late notice on July 7, 2021, regarding her balance. This notice was placed on her door handle in her absence.

2. Also, could you please let me know the three employees that conducted the property inspection at the CP's apartment on July 14, 2023.

Response: All County does not have record that any employee conducted an inspection in her unit on July 14, 2023. All County did have independent contractors providing maintenance on the property during the month of July. It is also possible that they were resolving any pending issues with housing regarding the abatement.

3. Please provide a sworn affidavit from Lindsey North to include why she notified St. Petersburg Housing Authority caseworker Lavonna Heller on 7/13/2023 that the CP "has been late and accumulating quite a balance. I have attached her ledger. I need to know what steps are needed to non-renew her."

Response: Attached please see the signed statement from Lindsey North. A sworn statement will be obtained and provided. After many attempts of trying to resolve issues with resident with no resolution, All County was told by housing to non-renew the resident not only for the aged receivables but the difficulty in getting these issues resolved. After receiving this information from the housing authority, All County then issued the no-renewal.

4. Please provide me how the CP is constantly being labeled as delinquent on rent. What additional information did your client receive from the SPHA that showed the CP was not delinquent after this complaint was filed?

Response: The CP was delinquent on rent based upon the information All County received from the owner. CP was told that she had a balance and continued to push blame to housing authority and told All County it needed to reach out to the housing authority. All County told her on many occasions that All County would sit down and assist her with this, but All County needed her full cooperation which was never received. All County also received an abatement letter where the housing authority withheld rent but stated if CP stayed in this unit that she would be responsible to pay rent.

5. Did Ms. North advise the CP's legal counsel that the CP was not in a lease and was month to month?

Response: All County was told by the housing authority that CP had a contract that automatically renewed with housing and did not need a lease.

6. Was the CP in a lease and if so, please provide a copy?

Response: No, she was not on an active lease provided by owner or All County.

7. How would the SPHA disperse Section 8 funds to your client if no lease was in place? Please see attached image.

Response: All County was told by the housing authority that the paperwork filled out from housing assistance was sufficient in getting the resident renewed as it was a lease addendum they were providing. All County filled out all necessary paperwork less the lease upon time for renewal of resident. All County was told by the housing authority that the housing authority would automatically renew leases and did not need a current lease.

Nature of Document: Sworn Affidavit of Lindsey North

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: October 13, 2023

Date Obtained: October 13, 2023

Sworn affidavit of Lindsey North

Nature of Document: Rent ledger from CP 3

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 14, 2023

Date Obtained: October 14, 2023

Rent ledger from CP 3

Nature of Document: CP letter to Lavonna Heller concerning non renewal notice

Who Provided: CP

How Transmitted to HUD: email

Date of Document: August 03, 2023

Date Obtained: October 14, 2023

CP letter to Lavonna Heller concerning non renewal notice

Nature of Document: SPHA Inspection reports and reinspection approval

Who Provided: Lavonna Heller

How Transmitted to HUD: email

Date of Document: March 13, 2023

Date Obtained: October 17, 2023

SPHA Inspection reports and reinspection approval

Nature of Document: Rent transactions ledger

Who Provided: Lavonna Heller

How Transmitted to HUD: email

Date of Document: October 18, 2023

Date Obtained: October 18, 2023

Rent transactions ledger

Nature of Document: Response to RFI

Who Provided: Attorney Comparetto

How Transmitted to HUD: email

Date of Document: October 18, 2023

Date Obtained: October 18, 2023

Ms. Jackson was not delinquent in her rent with me at the time All County took over Property Management responsibilities.

Anthony J. Comparetto, Esq.  
Comparetto Law Firm

Nature of Document: Response to RFI  
Who Provided: Lavonna Heller  
How Transmitted to HUD: email  
Date of Document: October 18, 2023  
Date Obtained: October 18, 2023

Hello Mr. Sarivola,

The landlord did reach out to us and provided a ledger stating Ms. Jackson was behind on rent. Our policy is for us to send the client an unpaid rent letter, and one was sent to her and the landlord. When Ms. Jackson received the letter, she called me about the rent. I informed her the unpaid rent was between her and the landlord. Ms. Jackson supplied our office with letters and documentation regarding the unpaid rent. I have attached a copy of the email and ledger from the landlord and the unpaid rent letter sent from us. After the first year we do not require a lease because the lease is between the tenant and the landlord. We will continue to pay subsidy on a month-to-month basis.

Thank you.

Nature of Document: Letter from SPHA to CP regarding delinquent rent  
Who Provided: Lavonna Heller  
How Transmitted to HUD: email  
Date of Document: July 14, 2023  
Date Obtained: October 18, 2023

Letter from SPHA to CP regarding delinquent rent

Nature of Document: Email from Lindsey North  
Who Provided: Lavonna Heller  
How Transmitted to HUD: email  
Date of Document: July 13, 2023  
Date Obtained: October 18, 2023

Email from Lindsey North alleging CP was delinquent in rent

Nature of Document: CP statement regarding communication  
Who Provided: CP  
How Transmitted to HUD: email  
Date of Document: October 23, 2023  
Date Obtained: October 23, 2023

To Mr. Frank Sarivola, I never not once didn't communicate. With All County Suncoast Property Management. I've called and documented the dates and times. As well as Deborah N Jackson went in person. To All County Suncoast Property Management office. On March 21, 2023. All County Suncoast Property Management has been the individuals not communicating. Hanging up the phone, No return phone calls. Only placing Three Day To Pay Rent Or Give Possession Notices on my doorknob. My

Housing Specialist LaVonna Heller can also inform you about the non-communication she received as well. From All County Suncoast Property Management again lies. All County Suncoast Property Management. Lindsey North was reached after several times. Marie Harrell my attorney with Gulf coast Legal. Called me on July 24,2023 and informed me. That Lindsey North wanted Deborah N Jackson to make an appointment. To come into the office to work out a payment plan in regard to Deborah N Jackson paying monies too. ALL COUNTY SUNCOAST PROPERTY MANAGEMENT. I emailed Marie Harrell on July 24,2023 at 4: 53pm.And stated in my email that going into their office was not in my best interest. Because Deborah N Jackson didn't owe All County Suncoast Property Management any money at all. So, what would the purpose be. I had been trying everything that I could do to resolve this issue of money owed. From February 24,2023 to October 10,2023. And acquired two attorneys, Janie Inverso, Marie Harrell. As well as my Housing Specialist. I suffer from High blood pressure and other illnesses. This has been a brutal situation, that Deborah N Jackson shouldn't have not had to go through with at all.

Nature of Document: CP documenting contact with RP All

Who Provided: CP

How Transmitted to HUD: email

Date of Document: October 23, 2023

Date Obtained: October 23, 2023

CP documenting contact with RP All

Nature of Document: CP documenting contact with RP All

Who Provided: CP

How Transmitted to HUD: email

Date of Document: October 23, 2023

Date Obtained: October 23, 2023

CP documenting contact with RP All personal notes

Nature of Document: CP documenting contact with RP All

Who Provided: CP

How Transmitted to HUD: email

Date of Document: October 23, 2023

Date Obtained: October 23, 2023

CP documenting contact with RP All

Nature of Document: CP documenting contact with RP All

Who Provided: CP

How Transmitted to HUD: email

Date of Document: October 23, 2023

Date Obtained: October 23, 2023

CP documenting contact with RP All

Nature of Document: CP documenting contact with RP All

Who Provided: CP

How Transmitted to HUD: email

Date of Document: October 23, 2023

Date Obtained: October 23, 2023

CP documenting contact with RP All

Nature of Document: CP documenting contact with RP All

Who Provided: CP

How Transmitted to HUD: email

Date of Document: October 23, 2023

Date Obtained: October 23, 2023

CP documenting contact with RP All

Nature of Document: CP documenting contact with RP All

Who Provided: CP

How Transmitted to HUD: email

Date of Document: October 23, 2023

Date Obtained: October 23, 2023

CP documenting contact with RP All

Nature of Document: Correspondence between CP and Gulf Coast Legal

Who Provided: CP

How Transmitted to HUD: email

Date of Document: July 19, 2023

Date Obtained: October 23, 2023

To: Marie Harrell [marieh@gulfcoastlegal.org](mailto:marieh@gulfcoastlegal.org)

My last lease agreement to my knowledge. Is my lease being up with St. Petersburg Housing Authority until October 2023. And I have to have 60 days' notice before my lease is up. And I too must give All County Suncoast Property Management 60-day notice. The letter today mentions by August 31, 2023 isn't 60 days. I'm waiting to hear back from LaVonna Heller as to the exact day my lease is up. I sign a lease in August 3, 2012 when I first moved into this apartment. But 2013 until the present with the St. Petersburg Housing Authority and owner of this property. It was in October. And has been that way until the present day. Please notify me as to what's going on with this case. I prefer a phone call please. My number is 727-520-2457.

On Thu, Jun 8, 2023, 6:24 PM Deborah Jackson <jdeborah741@gmail.com> wrote:  
Ok, thanks for the update. My issue is with owing any money, rent, late fees, posting fees. No one can and haven't said one word to me or my Housing Counselor LaVonna Heller about this money situation. She and I both have tried to reach out. In numerous occasions. All I get is these 3 Day Notices on my doorknob and these so-called generalized emails. This all started on a phone call on February 24th saying I owe 660.96. I got no notice or anything. Nothing for the entire year of 2022. All County Suncoast Property Management been. Managing these apartments since July 14, 2021. My housing Counselor LaVonna Heller to today's date have not received a phone call back. I Deborah N. Jackson definitely know for a fact. And produced my bank statements proving I owe nothing. So good luck on n getting a reply back. It's been nothing but them harassing me for money that's not owed.

On Thu, Jun 8, 2023, 1:13 PM Marie Harrell <marieh@gulfcoastlegal.org> wrote:

Hello Ms. Jackson,

Called the contact at All County Property Management & Realty. Her name is Erin. She said she is the one who likely signed the recent 3-day notice received by you. Once I explained what your issue was (late fees & posting fees that you dispute) she said that I had to speak with someone different. She then transferred me to "Lindsey" at that same number: (727)-541-2578 at extension 107. Lindsey did not pick up so I left her a detailed voicemail to call me back. Hopefully I will hear from her soon.

Best,

Marie Harrell, Esq.

Housing Attorney

Nature of Document: Response to RFI

Who Provided: Attorney Heim

How Transmitted to HUD: email

Date of Document: October 24, 2023

Date Obtained: October 25, 2023

As of 8/7/23, the balance owed by Ms. Jackson specifically is the same as 8/3/23, the last date on the rent ledger. CP owed \$75.00 late charge and \$50.00 posting fee for May 2023. For that particular month, CP owed the entire rent due to the Housing Authority's abatement decision. The Housing Authority chose to pay the May rent in June, but it was not paid in May when due.

The Housing Authority owed the remainder of the rent ledger balance of \$468.00 as of 8/7/23-\$343.00.

Nature of Document: Response to RFI

Who Provided: Lavonna Heller

How Transmitted to HUD: email

Date of Document: October 26, 2023

Date Obtained: October 26, 2023

Hello Mr. Sarivola,

I have attached the portion letters for 1/1/2022 and 10/1/2022 showing our portion as well as the tenant's portion. I have also included our ledger showing all payments paid to All County. No payments were missed.

No, SPHA did not inform All County to give notice of non-renewal.

Nature of Document: Notification Letters

Who Provided: Intake

How Transmitted to HUD:

Date of Document: July 28, 2023

Date Obtained:

OHR letter to CP Sent to

Deborah Jackson

3467 33rd Avenue North

Apt. 9

St. Petersburg, FL 33713

Contains

Cover letter

903 signed copy

100 day notice

Nature of Document: Notification Letters

Who Provided: Intake

How Transmitted to HUD:

Date of Document: July 28, 2023

Date Obtained:

OHR letter sent to RP 1 sent to

PKC2LLC

C/O Paracorp Incorporate; Registered Agent

155 Office Plaza Drive

1st Floor

Tallahassee, FL 32301

Contains

Cover letter

Copy of signed 903

Conciliation form

RFI questions

100 day notice

Nature of Document: Notification Letters

Who Provided:

How Transmitted to HUD:

Date of Document: July 28, 2023

Date Obtained:

OHR letter sent to RP 2 sent to

All County Property Management and Realty Inc. d/b/a All County Suncoast Property Management

C/O Sandra Ferrera; Registered Agent:

1700 66th Street North

Suite 402  
St. Petersburg, FL 33710  
Contains  
Cover letter  
Copy of signed 903  
Conciliation form  
RFI questions  
100 day notice

Nature of Document: Signed Complaint

Who Provided: Intake

How Transmitted to HUD:

Date of Document: July 24, 2023

Date Obtained:

Signed complaint received. sent request for case number

C. Interrogatories

D. Factual Observations

*Betina Baron*

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Betina Baron, Compliance Manager