



OFFICE OF THE PROPERTY APPRAISER

Summary Report

Generated On : 12/28/2016

Property Information	
Folio:	03-4130-009-1550
Property Address:	1505 SUNSET DR Coral Gables, FL 33143-5878
Owner	JOSEPH P KLOCK
Mailing Address	720 CORAL WAY APT 6B CORAL GABLES, FL 33134-4878
Primary Zone	6400 COMMERCIAL - CENTRAL
Primary Land Use	1913 PROFESSIONAL SERVICE BLDG : OFFICE BUILDING
Beds / Baths / Half	0 / 4 / 0
Floors	2
Living Units	0
Actual Area	Sq.Ft
Living Area	Sq.Ft
Adjusted Area	3,712 Sq.Ft
Lot Size	7,500 Sq.Ft
Year Built	1946



Assessment Information			
Year	2016	2015	2014
Land Value	\$750,000	\$750,000	\$750,000
Building Value	\$172,720	\$46,840	\$100,000
XF Value	\$7,755	\$0	\$0
Market Value	\$930,475	\$796,840	\$850,000
Assessed Value	\$876,524	\$796,840	\$850,000

Benefits Information				
Benefit	Type	2016	2015	2014
Non-Homestead Cap	Assessment Reduction	\$53,951		

Note: Not all benefits are applicable to all Taxable Values (i.e. County, School Board, City, Regional).

Short Legal Description
CORAL GABLES RIVIERA SEC 14 2ND W34FT LOT 22 & E41FT LOT 23 BLK 205 PB 28-32 LOT SIZE 75.000 X 100 OR 18477-3873 0199 4

Taxable Value Information			
	2016	2015	2014
County			
Exemption Value	\$0	\$0	\$0
Taxable Value	\$876,524	\$796,840	\$850,000
School Board			
Exemption Value	\$0	\$0	\$0
Taxable Value	\$930,475	\$796,840	\$850,000
City			
Exemption Value	\$0	\$0	\$0
Taxable Value	\$876,524	\$796,840	\$850,000
Regional			
Exemption Value	\$0	\$0	\$0
Taxable Value	\$876,524	\$796,840	\$850,000

Sales Information			
Previous Sale	Price	OR Book-Page	Qualification Description
01/01/1999	\$0	18477-3873	Sales which are disqualified as a result of examination of the deed

The Office of the Property Appraiser is continually editing and updating the tax roll. This website may not reflect the most current information on record. The Property Appraiser and Miami-Dade County assumes no liability, see full disclaimer and User Agreement at <http://www.miamidade.gov/info/disclaimer.asp>

Version

CITY'S

EXHIBIT 1



1505 Sunset Dr

1505 Sunset Dr

<p><u>Owner</u> Joseph P. Klock 720 Coral Way, Apt. 6B Coral Gables, FL 33134-4878</p>	<p><u>Owner</u> Joseph P. Klock 606 Island Dr Key Largo, FL 33037-4808</p>
<p><u>Judgment lienholder</u> Westview Country Club 2601 Gratigny Pkwy Miami, FL 33167-2665</p>	<p><u>Judgment lienholder</u> Westview Country Club c/o Jules L. Arkin Registered Agent 1111 Lincoln Rd Suite 500 Miami Beach, FL 33139-2452</p>
<p><u>Judgment lienholder</u> U.S. Bancorp Equipment Finance, Inc. c/o Richard B. Storfer, Esq. and Riley W. Cirulnick, Esq. Rice Pugatch Robinson & Schiller, P.A. 101 NE Third Ave Suite 1800 Fort Lauderdale, FL 33301-1252</p>	<p><u>Judgment lienholder</u> U.S. Bancorp Equipment Finance, Inc. Attn: Legal Department 800 Nicollet Mall BC-MN-H210 Minneapolis, MN 55402-7000</p>
<p><u>Judgment lienholder</u> Mario Capone d/b/a Mario's Dry Cleaning a/k/a Mario's 5828 SW 71 St South Miami, FL 33143-3639</p>	<p><u>Judgment lienholder</u> Internal Revenue Service Centralized Lien Operation P.O. Box 145595 Stop 8420G Cincinnati, OH 45250-5595</p>



Home Citizen Services Business Services Back to Coral Gables.com

Permits and Inspections: Search Results

Logon Help Contact

New Permit Search

Permit Search Results

Permit#:	App. Date	Street Address	Type	Description	Status	Issue Date	Final Date	Fees Due
AB-11-10-7247	10/24/2011	1505 SUNSET DR	BOA COMPLETE (LESS THAN \$75,000)	RE ROOF MONIER SAXONY 900 SLATE FLATE WHITE TILE TO MATCH EXISTING \$17,115	final	10/24/2011	12/29/2011	0.00
BL-11-10-7502	10/26/2011	1505 SUNSET DR	ROOF / LIGHT WEIGHT CONC	RE ROOF MONIER SAXONY 900 SLATE FLATE WHITE TILE TO MATCH EXISTING \$17,115	final	11/03/2011	12/29/2011	0.00
DR-12-09-0360	09/07/2012	1505 SUNSET DR	DEVELOPMENT REVIEW COMMITTEE	APPLICANT PROPOSES TO OPEN AN ALTERNATIVE PRESCHOOL PROGRAM FOR CHILDREN AGES 2 TO 4. ADULT WOMEN'S EXERCISE PROGRAMS WILL ALSO BE HELD IN CONJUNCTION WITH THE PRESCHOOL PROGRAM.	final	09/07/2012	09/15/2014	0.00
RC-17-01-0041	01/03/2017	1505 SUNSET DR	BUILDING RE CERTIFICATION	BUILDING RECERTIFICATION (1946) CONSTRUCTION REGULATION BOARD CASE #16-5685 AND UNSAFE STRUCTURE BOARD FEE	approved			980.63
ZN-08-11-0392	11/07/2008	1505 SUNSET DR	PAINT / RESURFACE FL / CLEAN	PAINT EXTERIOR (WEST) \$3,200 WALLS SW6674 YELLOW TO MATCH EXISTING TRIM WHITE (REF: PERMIT # 98020517) EXISTING GREEN SHUTTERS TO REMAIN	final	11/07/2008	03/11/2009	0.00
ZN-13-06-0974	06/17/2013	1505 SUNSET DR	ASPHALT - RESURFACE / SEALANT	ASPHALT REPAIR AFTER UNDERGROUND UTILITY WORK @ 650 SF - #1,450	final	01/22/2014	03/05/2014	0.00

CITY'S

EXHIBIT

2

ZV-14-06-2397	06/05/2014	1505	ZONING	CANCELLED-	canceled	06/05/2014	0.00
		SUNSET DR	LETTER	ZONING			
			VERIFICATION	VERIFICATION			
				LETTER			

The City's online services are protected with an **SSL encryption certificate**. For technical assistance, please call 305-569-2448 (8am-5pm, M-F).



**City of Coral Gables
Fire Department**

Fire Prevention Division
2815 Salzedo Street, Coral Gables, FL 33134
Fax (305) 460-5598

The items noted below are in violation of the Florida Fire Prevention Code and/or the Florida Administrative Code. Nothing in this report supersedes any previously written, still existing violations for this occupancy/building. You are directed to comply with corrective measures as indicated.

Occupant Name:	Chrysalis Health	Inspection Date:	1/5/2017
Address:	1505 Sunset Drive	InspectionType:	AA-Tactical, Business (Annual Fire Inspection)
City:	Coral Gables	Inspected By:	Leonard Veight 305-460-5577 lveight@coralgables.com
Suite:		Occ. Sq. Ft.:	3712

No violations noted at this time.

Company Representative:

Signature of Angie Echevery
1/5/2017 9:34:31 AM
Signature valid only in mobile-eyes documents

Angie Echevery
1/5/2017

Inspector:

Signature of Leonard Veight
1/5/2017 10:34:31 AM
Signature valid only in mobile-eyes documents

Leonard Veight
1/5/2017

CITY'S

EXHIBIT 3



The City of Coral Gables

Development Services Department

CITY HALL 405 BILTMORE WAY
CORAL GABLES, FLORIDA 33134

4 25 2016

VIA CERTIFIED MAIL

91 7108 2133 3931 9002 6909

JOSEPH P KLOCK
720 CORAL WAY, 6B
CORAL GABLES, FL 33134-4878

RE: 1505 SUNSET DR. CORAL GABLES, FL
FOLIO # 03-4130-009-1550
Recertification of Building 40 Years or Older

Gentlemen:

Miami-Dade County has notified this Department that the above referenced property address is forty (40) years old, or older, having been built in 1946.

In accordance with the Miami-Dade County Code, Chapter 8, Section 8-11(f), a Florida Registered Architect or Professional Engineer must inspect said building and a completed Recertification Report ("Report") must be submitted to this Department within ninety (90) calendar days from the date of this letter. In addition to the Report, a cover letter must state the property meets the requirement for the building recertification; no additional documents or photographs are necessary. Submittal of the Report does not constitute recertification; it must be approved.

In the event repairs or modifications are found to be necessary resulting from the recertification inspection, the Building Official is able to grant an extension of one hundred fifty (150) calendar days from the date of this letter for the owner to obtain the necessary permits and perform the repairs. Recertification will take place once a revised Report is submitted and all required permits are closed.

The Architect or Engineer chosen to perform the inspection may obtain the required Form, "Minimum Inspection Procedural Guidelines for Building Recertification," from the following link: http://www.miamidade.gov/pa/property_recertification.asp. The Recertification Report fee of \$380.63 and the Filing fee of \$2.45 per document page shall be submitted to the Development Services Department, 405 Biltmore Way, 3rd Floor, Coral Gables, Florida, 33134.

Failure to submit the required Report within the allowed time will result in the referral of this matter to the City's Construction Regulation Board without further notice. The Board may impose fines of \$250.00 per day for each day the violation continues. Note an Administrative fee of \$600.00 is incurred when the case is referred to the Board.


Any questions may be directed to the Building Services Coordinator at (305) 460-5250. Thank you for your prompt consideration.

Sincerely,

Peter J. Iglesias, P.E.
Building Official

CITY'S Composite

EXHIBIT 4

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee																	
1. Article Addressed to: JOSEPH P KLOCK 720 CORAL WAY, 6B CORAL GABLES, FL 33134-4878	B. Received by (Printed Name)	C. Date of Delivery																
 9590 9402 1194 5246 9253 63	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No																	
2. Article Number (Transfer from service label) 9171082133393190026909	3. Service Type <table border="0" style="width: 100%;"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>		<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																	
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																	
<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																	
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Return Receipt for Merchandise																	
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™																	
<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																	
<input type="checkbox"/> Insured Mail																		
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																		
PS Form 3811, July 2015 PSN 7530-02-000-9053		2016 Recert Domestic Return																

BEFORE THE CONSTRUCTION REGULATION BOARD
FOR THE CITY OF CORAL GABLES

CITY OF CORAL GABLES,
Petitioner,

Case No. 16-5685

vs.

JOSEPH P. KLOCK
720 Coral Way, Apt. 6B
Coral Gables, Florida 33134-4878

Return receipt number:

91 7108 2133 3932 6150 7016

Respondent.

**NOTICE OF UNSAFE STRUCTURE VIOLATION FOR FAILURE TO RECERTIFY
AND NOTICE OF HEARING**

Date: January 23, 2017

Re: **1505 Sunset Drive**, Coral Gables, Florida 33143-5878 and legally described as W34ft Lot 22 & E41ft Lot 23, Block 205, of CORAL GABLES RIVIERA SECTION 14 2nd, according to the Plat thereof, as recorded in Plat Book 28, Page 32, of the Public Records of Miami-Dade County, Florida; and having folio number 03-4130-009-1550 ("Property").

The City of Coral Gables ("City") Building Official has inspected the records relating to the Structure in accordance with Article III, Chapter 105 of the City Code, pertaining to unsafe structures, and Section 8-11 of the Miami-Dade County Code, as applicable in the City, pertaining to existing buildings. The Structure is hereby declared unsafe by the Building Official and is presumed unsafe pursuant to Section 105-I 86(j)(13) of the City Code for failure to timely comply with the maintenance and recertification requirements of the Florida Building Code or Section 8-11 of the Miami-Dade County Code.

Therefore, this matter is set for hearing before the City's Construction Regulation Board ("Board") in the Commission Chambers, City Hall, 405 Biltmore Way, Coral Gables, Florida 33134, on February 6, 2017, at 2:00 p.m.

You may appeal the decision of the Building Official to the Board by appearing at the hearing. You have the right to be represented by an attorney and may present and question witnesses and evidence; however, formal rules of evidence shall not apply. Failure to appear at the hearing will result in the matter being heard in your absence. Please be advised that if someone other than an attorney will be attending the hearing on your behalf, he or she must provide a power of attorney from you at the time of the hearing. Requests for continuance must be made in writing to Belkys Garcia, Secretary to the Board, at City of Coral Gables, Development Services Department, 405 Biltmore Way, 3rd Floor, Coral Gables, FL 33134, bgarcia@coralgables.com, tel: (305) 460-5229. The Development Services Department's hours are Monday through Friday, 7:30 a.m. to 3:30 p.m., tel: (305) 460-5235.

If the Required Action is not completed before the above hearing date, the Building Official may order

that the structure be vacated, boarded, secured, and posted (including but not limited to, requesting the electric utility to terminate service to the Structure) to prevent further occupancy until the Required Action is completed. The Building Official may also order demolition of the Structure and the City may recover the costs incurred against the Property and the Owner of record.

If the Property owner or other interested party does not take all Required Action or prevail at the hearing, the Construction Regulation Board may impose fines not to exceed \$250 for each day the violation continues past the date set for compliance and may also enter an order of demolition and assess all costs of the proceedings, in an amount not less than \$600, and the costs of demolition and other required action, for which the City shall have a lien against the Property owner and the Property.

Please govern yourself accordingly.


Belkys Garcia, Secretary to the Board

ADA NOTICES

Any person who acts as a lobbyist pursuant to the City of Coral Gables Ordinance No. 2006-11, must register with the City Clerk, prior to engaging in lobbying activities before the city staff, boards, committees and/or the City Commission. A copy of the Ordinance is available in the Office of the City Clerk, City Hall.

Presentations made to this Board are subject to the City's False Claims Ordinance. Chapter 39 of the City of Coral Gables Code.

Pursuant to Section 286.0105, Florida Statutes, if a person decides to appeal any decision made by the Board, with respect to any matter considered at such hearing or meeting, he or she will need a record of the proceedings, and that, for such purpose, he or she may need to ensure that a verbatim record of the proceedings is made; which record includes the testimony and evidence upon which the appeal is to be based. Although a court reporter usually attends the hearing at the City's cost, the City is not required to provide a transcript of the hearing, which the Respondent may request at the Respondent's cost.

Any person who needs assistance in another language in order to speak during the public hearing or public comment portion of the meeting should contact the City's ADA Coordinator, Raquel Elejabarrieta, Esq., Director of Labor Relations and Risk Management (E-mail: relejabarrieta@coralgables.com, Telephone: 305-722-8686, TTY/TDD: 305-442-1600), at least three (3) business days before the meeting.

Any person with a disability requiring communication assistance (such as a sign language interpreter or other auxiliary aide or service) in order to attend or participate in the meeting should contact the City's ADA Coordinator, Raquel Elejabarrieta, Esq., Director of Labor Relations and Risk Management (E-mail: relejabarrieta@coralgables.com, Telephone: 305-722-8686, TTY/TDD: 305-442-1600), at least three (3) business days before the meeting.

C:

Joseph P. Klock, 606 Island Drive, Key Largo, Florida 33037-4808

Westview Country Club, 2601 Gratigny Parkway, Miami, Florida 33167-2665

Westview Country Club, c/o Jules L. Arkin, 1111 Lincoln Road, Suite 500, Miami Beach, Florida 33139-2452

U.S. Bancorp Equipment Finance, Inc., c/o Richard B. Storfer, Esq. and Riley W. Cirulnick, Esq., Rice Pugatch Robinson & Schiller, P.A., 101 N.E. 3rd Avenue, Suite 1800, Ft. Lauderdale, Florida 33301-1252

U.S. Bancorp Equipment Finance, Inc., Attn: Legal Department, 800 Nicollet Mall, BC-MN-H210, Minneapolis, MN 55402-7000

Mario Capone d/b/a Mario's Dry Cleaning a/k/a Mario's, 5828 S.W. 71st Street, South Miami, Florida 33143-3639

Internal Revenue Service Centralized Lien Operation, P.O. Box 145595, Stop 8-420G, Cincinnati, Ohio 45250-5595



CITY OF CORAL GABLES
DEVELOPMENT SERVICES DEPARTMENT
Affidavit of Posting

Complaint Case #: 16-5685

Title of Document Posted: Construction Regulation Board Case

I, JOSE PAZ, DO HEREBY SWEAR/AFFIRM THAT
THE AFOREMENTIONED NOTICE WAS PERSONALLY POSTED. BY ME. AT THE
ADDRESS OF 1505 Sunset Drive, ON 1-23-17
AT 10:55 am.

JOSE PAZ
Employee's Printed Name

[Signature]
Employee's Signature

STATE OF FLORIDA)
ss.
COUNTY OF MIAMI-DADE)

Sworn to (or affirmed) and subscribed before me this 23rd day of January, in
the year 20 17, by Jose Paz who is personally known to
me.

My Commission Expires:



Belkys Garcia
Notary Public

1505 SUNSET DRIVE (THE NUMBER ON THE BUILDING SHOWS AS 1501 INSTEAD OF THE LEGAL ADDRESS OF 1505 SUNSET DRIVE)

**BEFORE THE CONSTRUCTION REGULATION BOARD
FOR THE CITY OF CORAL GABLES**

CITY OF CORAL GABLES
Petitioner

Case No. 16-3685

vs

ROYA P.H. KLOCK
720 Coral Way, Apt. 601
Coral Gables, Florida 33134-4478

Return receipt number:
11 7108 2133 3932 6340 7024

Respondent

**NOTICE OF UNLAW STRUCTURE VIOLATION FOR FAILURE TO RECTIFY
AND NOTICE OF HEARING**

Dated January 25, 2017

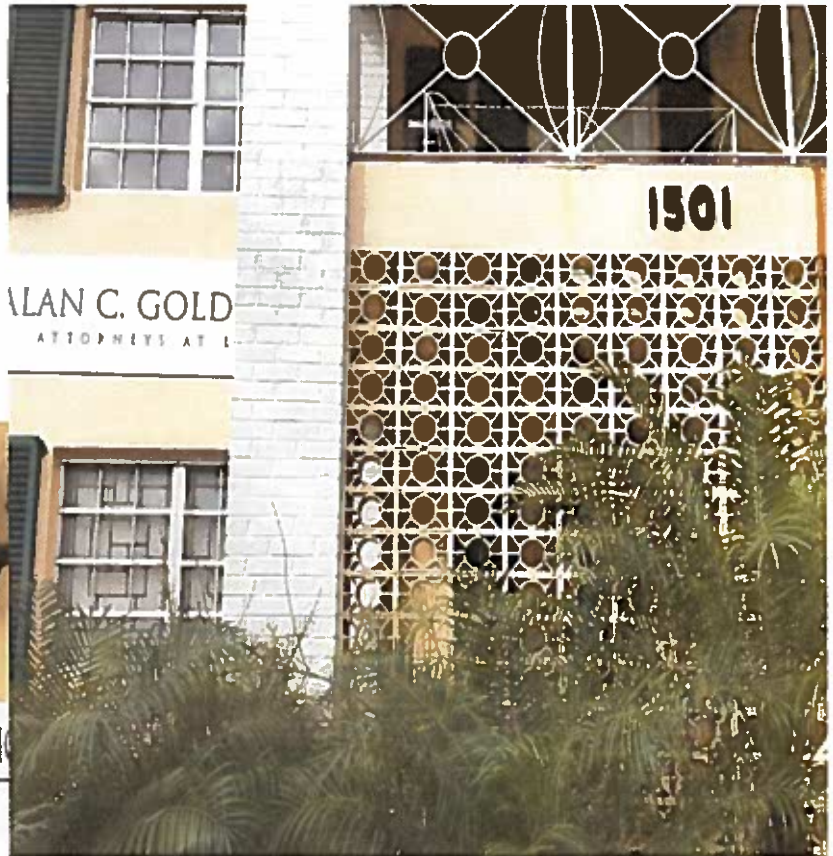
Re: **1505 Sunset Drive**, Coral Gables, Florida 33134-5679 and legally described as W-348 Lot 22 & 1419 Lot 23, Block 205, of CORAL GABLES RIVIERA SECTION 14 2nd, according to the Plat thereof, as recorded in Plat Book 24, Page 32, of the Public Records of Miami-Dade County, Florida, and having file number 03-4138-479-1250 ("Property")

The City of Coral Gables ("City") Building Official has inspected the records relating to the Structure in accordance with Article III, Chapter 105 of the City Code, pertaining to unmade structures, and Section 5-11 of the Miami-Dade County Code, as applicable in the City, pertaining to existing buildings. The Structure is hereby declared unmade by the Building Official and is prohibited pursuant to Section 105-1.04(2)(1) of the City Code for failure to timely comply with the maintenance and recordation requirements of the Florida Building Code or Section 5-11 of the Miami-Dade County Code.

Therefore, this matter is set for hearing before the City's Construction Regulation Board ("Board") in the Commission Chambers, City Hall, 405 Biltmore Way, Coral Gables, Florida 33134, on February 6, 2017, at 2:00 p.m.

You may appeal the decision of the Building Official to the Board by appearing at the hearing. You have the right to be represented by an attorney and may present and question witnesses and evidence, however, based on your absence. Please be advised that if someone other than an attorney will be attending the hearing on your behalf, he or she must provide a power of attorney from you at the time of the hearing. Requests for continuance must be made in writing to Kelly's Office, Secretary to the Board, at City of Coral Gables, Development Services Department, 405 Biltmore Way, 1st Floor Coral Gables, FL 33134. openings@coralgables.com, tel. (305) 460-5229. The Development Services Department's hours are Monday through Friday, 7:30 a.m. to 5:30 p.m., tel. (305) 460-5214.

If the Required Action is not completed before the above hearing date, the Building Official may order



SUSAN M. GIRSCH, ESQ.

Address: 5095 SW 82 ST.
MIAMI FL 44143

This Instrument Prepared by:
SUSAN M. GIRSCH, ESQ.
Address: 5095 SW 82 ST.
MIAMI FL 33143

1507 Sunset Rd
Property Appraiser Parcel Identification (Folio) Number(s):
.03-4130-69-1540 0091550
Grant(s) S.S. No(s): 209-12-1242

OFF REC 18477 PG 3873

99K078666 1999 FEB 12 16:21

DOCS/PDCE 9.50 SUPTX 0.00
HARVEY RUVIN, CLERK DADE COUNTY, FL

Commonwealth Trust Co., Inc. 1987

SPACE ABOVE THIS LINE FOR PROCESSING DATA SPACE ABOVE THIS LINE FOR RECORDING DATA
This Quit-Claim Deed, Executed this 28th day of JANUARY, A.D. 19 99, by

JOSEPH P. KLOCK and MARY D. KLOCK, his wife,
first party, to
JOSEPH P. KLOCK,
whose post office address is

606 ISLAND DRIVE, KEY LARGO, FL 33037

second party:

(Wherever used herein the terms "the party" and "second party" shall include singular and plural, heirs, legal representatives, and assigns of individuals, and the successors and assigns of corporations, wherever the context so admits or requires.)

Witnesseth, That the said first party, for and in consideration of the sum of \$ 10.00
in hand paid by the said second party, the receipt whereof is hereby acknowledged, does hereby remise, release and
quit-claim unto the said second party forever, all the right, title, interest, claim and demand which the said first
party has in and to the following described lot, piece or parcel of land, situate, lying and being in the County of
DADE, State of FLORIDA, to-wit:

Lot 22, less the East 16 feet and lot 23,
less the West 9 feet, in Block 205, of
SECOND REVISED PLAT OF CORAL GABLES RIVIERA
SECTION PART 14, according to the Plat
thereof, as recorded in Plat Book 28, at
Page 32, of the Public Records of Dade County,
Florida.

HARVEY RUVIN
CLERK DADE COUNTY
CLERK DADE COUNTY

To Have and to Hold The same together with all and singular the appurtenances therunto belonging
or in anywise appertaining, and all the estate, right, title, interest, lien, equity and claim whatsoever of the said
first party, either in law or equity, to the only proper use, benefit and behoof of the said second party forever.

In Witness Whereof, The said first party has signed and sealed these presents the day and year first
above written.

Signed, sealed and delivered in the presence of:

Olga Pedrosa
Witness Signature (to be Co-Creator)
OLGA PEDROSO

Susan M. Girsch
Witness Signature (to be Co-Creator)
SUSAN M. GIRSCH

Olga Pedrosa
Witness Signature (to be Co-Creator, if any)
OLGA PEDROSO

Susan M. Girsch
Witness Signature (to be Co-Creator, if any)
SUSAN M. GIRSCH

Olga Pedrosa
Witness Signature (to be Co-Creator, if any)
OLGA PEDROSO

Susan M. Girsch
Witness Signature (to be Co-Creator, if any)
SUSAN M. GIRSCH

STATE OF FLORIDA
COUNTY OF DADE

JOSEPH P. KLOCK and MARY D. KLOCK, his wife,

known to me to be the person s described in and who executed the foregoing instrument, who acknowledged before me that they
executed the same, that I relied upon the following form of identification of the above-named person drivers' licenses
and that an oath (was/has been) taken.

Joseph P. Klock **RF**
Creator Signature
JOSEPH P. KLOCK

606 ISLAND DRIVE, KEY LARGO, FL
Printed Name
Post Office Address 33037

Mary D. Klock **RF**
Co-Creator Signature (if any)
MARY D. KLOCK

606 ISLAND DRIVE, KEY LARGO, FL
Printed Name
Post Office Address 33037

I hereby Certify that on this day, before me, an officer duly authorized
to administer oaths and take acknowledgments, personally appeared

NOTARY PUBLIC - FLORIDA
SUSAN M. GIRSCH
Notary Public, State of Florida
My Comm. Expires 1/23/2000
No. CC 828718
Bonded Through Official Notary Service
1 (800) 729-0121

Witness my hand and official seal in the County and State last aforesaid this
28th day of JANUARY, A.D. 19 99.

Susan M. Girsch
Notary Signature
Printed Notary Name **SUSAN M. GIRSCH**

IN THE COUNTY COURT, AND FOR
MIAMI-DADE COUNTY, FLORIDA
CIVIL DIVISION



CFN 2006R1012114
OR Bk 24929 Pg 2513f (1pg)
RECORDED 09/20/2006 16:22:55
HARVEY RUVIN, CLERK OF COURT
MIAMI-DADE COUNTY, FLORIDA
LAST PAGE

WESTVIEW COUNTRY CLUB,

Plaintiff,
vs. CASE NO.: 06-3939 SP 26 (02)

JOSEPH P. KLOCK, JR.,

Defendant.

FILED FOR RECORD
06 SEP -8 PM 12:02

DEFAULT FINAL JUDGMENT

IT IS HEREBY ORDERED AND ADJUDGED as follows:

That the Plaintiff, WESTVIEW COUNTRY CLUB, by virtue of default hereby recovers
from Defendant, JOSEPH P. KLOCK, JR., Social Security No. 201-36-xxxx,

The principal sum of \$ 3,661.25

Prejudgment interest \$ 111.60

Court costs of \$ 305.00

Attorney fees \$ 1,220.42

TOTAL JUDGMENT \$ 5,298.27

of which sum shall bear interest at 9% per annum, for which let execution issue forthwith.

Jhm **DONE AND ORDERED** in Chambers at Cutler Ridge, Miami-Dade County, Florida this
day of Sept, 2006.

COUNTY COURT JUDGE

Copies furnished to:
Roy E. Granoff, Esq., 12515 N. Kendall Drive, Suite 304, Miami, FL 33186
Joseph P. Klock, Jr., 5095 S.W. 82 Street, South Miami, FL 33143
Westview Country Club, 2601 Gratigny Parkway, Miami, FL 33167

Book 24909 Page 2816 Total Pages 1
CFN # 20060987567 Case # 06-003939-SP-26
Rec. Date 09/14/2006 D18

STATE OF FLORIDA, COUNTY OF DADE
I HEREBY CERTIFY that the foregoing is a true and correct copy of the
original on file in this office. **SEP 18 2006** AD 20
HARVEY RUVIN, Clerk of Circuit and County Courts
Deputy Clerk *Sharon Moore*





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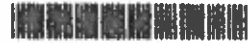
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2601 N.W. 119TH ST.
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Annual Reports

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1998	06/08/1998
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Document Images

08/09/1999 -- ANNUAL REPORT	View image in PDF format
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CFN 2013R0191902
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 RECORDED 03/12/2013 15:38:54
 HARVEY RUVIN, CLERK OF COURT
 MIAMI-DADE COUNTY, FLORIDA

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
 IN AND FOR MARTIN COUNTY, FLORIDA

U. S. BANCORP EQUIPMENT FINANCE, INC.,
 Plaintiff
 vs.
 SUNRISE AIR, INC., JOSEPH P. KLOCK, JR.,
 PARK AVENUE GROUP, INC.
 and GIBRALTAR BANK, FSB.,
 Defendants

CIVIL DIVISION
 CASE NO. 05-198-CA

FILED FOR RECORD
 MARTIN COUNTY, FLA.
 2013 JAN 28 PM 4:38
 CLERK OF COURT
 HARVEY RUVIN

FINAL SUMMARY JUDGMENT

THIS CAUSE came on to be heard December 11, 2012, upon the Plaintiff's Motion for Deficiency Judgment, or in the alternative, for Final Summary Judgment. Having heard the arguments of counsel, reviewed the file and the cited law, and being fully advised in the premises, the Court makes these conclusions of law:

1. This Court, Honorable Robert Makemson presiding, entered an Order Granting U.S. Bancorp Equipment Finance, Inc.'s ("Bancorp") Motion for Partial Summary Judgment on December 6, 2007. Judgment was granted to Plaintiff on the promissory note, security agreement and guaranty by Joseph P. Klock, Jr. ("Klock"), in the amount of \$1,344,022.36 plus per diem interest of \$409.84 from November 21, 2007 to December 5, 2007, less an amount for the sale of the aircraft which was security for the note. The Order reserved for determination whether the aircraft was sold in a commercially reasonable manner and determination of the value of the aircraft at the time it was sold (February 2, 2006).
2. The order also provided that Bancorp is entitled to recover its attorney's fees and costs against Sunrise Air, Inc. ("Sunrise") and Klock (collectively "Defendants"), and reserved jurisdiction to determine the amount.
3. After an evidentiary hearing, this Court, the undersigned presiding, entered an Order on November 8, 2011, making findings of fact and conclusions of law in which it determined that the sale of the aircraft was not commercially reasonable, and that the evidence rebutted the presumption that the value of the aircraft was equal to the debt. The Court found from the

Case No. 05-198CA

Final Summary Judgment



1

greater weight of the evidence that the value of the aircraft at the time it was sold was \$550,000.00.¹

4. The pending motion seeks a finding of the amount presently due to Bancorp in the absence of any issue of material fact. The Plaintiff relies on the affidavit of Deb Stibbe, Recovery Manager of Bancorp. The affidavit states that the amount due after all credits are given is \$954,349.45 plus per diem interest at the default rate of 15% of \$354.73 from July 15, 2012, plus attorney's fees and costs.
5. Sunrise and Klock oppose the pending motion on several grounds:
 - a. The Court's Order of November 4, 2011 should be revised to find that Bancorp utterly failed to meet its burden that the value of the aircraft was less than the amount owed and therefore the presumption remains that the debt was satisfied by the repossession of the aircraft.
 - b. The Affidavit of Deb Stibbe is defective and insufficient to support a summary judgment.
 - c. Bancorp's calculation of the amount due after all credits is erroneous.
 - d. Sunrise and Klock are the prevailing parties under Oregon law because they prevailed on the only substantial issue, which was the defense that the sale of the collateral was not commercially reasonable.
6. The Court affirms the Findings of Fact and Conclusions of Law made November 4, 2011.
7. The Court finds that the Affidavit of Deb Stibbe is legally sufficient.
8. The Court accepts the "starting point" for calculation of the amount due as \$1,052,588.76. This amount is accepted by the Defendants in their Response² except for a claim for a credit of \$58,504.62 for payments made in late 2004. By Affidavit of Alan R. Hochman dated December 7, 2012, Defendants' assert an agreement was made in September 2011 with Plaintiff's counsel of record. The Plaintiff's oral argument at the hearing on the present motion was that these payments were credited in the balance of \$1,052,558.76 in the

¹ This value was found in the deposition of Defendants' expert, Joaquin Ruiz in the record and cited by Defendants in their proposed Findings of Fact and Conclusions of Law filed September 28, 2011, page 17.

² Response of Sunrise Air and Klock to Motion for Deficiency Judgment or in the Alternative for Final Summary Judgment and for Adjudication of Entitlement to Attorneys' Fees dated December 10, 2012, p. 6.



Affidavit in support of the 2007 Partial Summary Judgment, and that the communication in September 2011 was not binding.

9. The Court finds that the Affidavit of J. Michael Bennett filed June 22, 2006, in support of the Motion for Partial Summary Judgment begins with a balance of \$1,052,558.76 as of January 5, 2005, just as Deb Stibbe's Affidavit does. The 2007 Partial Summary Judgment does not itemize the calculation of the balance due of \$1,341,022.36. It could be presumed that payments before January 5, 2005 were accounted for, and the amount of the partial summary judgment would be accepted now but for the communications between counsel in September 2011.
10. The Court finds that the email communications between Alan Hochman and Steven Lippman are a stipulation binding the parties which provides that Sunrise and Klock will be credited "with \$58,504.62 toward any judgment entered."³ The Court finds that this is a credit to be applied to a judgment, and not a credit on the balance due before a judgment is entered.
11. The Defendants raise several arguments regarding the method of application of credits and calculation of interest. They claim that the credits for the value of the aircraft and payments by XL Specialty Insurance Co. for damage to the aircraft should be applied as of October 17, 2005, based upon Plaintiff counsel's letter of October 7, 2005 declaring default, repossession and intent to sell the aircraft on or after October 17, 2005. These two amounts are \$550,000 and \$312,966.10 respectively. The Court has not been cited any legal authority for the correct date of application of the credit.
12. The Court finds that the \$550,000 for the aircraft should be credited on the date of sale (February 2, 2006) since that amount is based on the value on the date of sale. The Court finds that the \$312,966.10 should be credited on the date paid (October 6, 2006) and not the date of the letter declaring default. This is because the letter offered to accept that sum on October 17, 2005 but the Defendants did not agree, thus causing litigation with XL Specialty Insurance Co. resulting in delay of payment. Defendants will receive additional credit of \$42,500.00, however, which was interest paid by XL Specialty Insurance Co. on October 7, 2008. Defendants also are due a credit of \$30,000 from Global Aerospace Insurance Co. as of November 21, 2005 about which there is no dispute.

³ E-mail from Steven Lippman, "Exhibit B" to Affidavit of Allan R. Hochman, December 12, 2011.



13. The Defendants note that the calculation in the Affidavit of Deb Stibbe charges interest on prior interest each time a credit is applied to the balance. The Court will calculate interest separately without this compounding of interest.
14. The Defendants contest the default interest rate of 15% provided in the note, arguing that the rate of 8.9% was claimed by the Plaintiff at the time of the Partial Summary Judgment. The Court finds to the contrary. The Affidavit of J. Michael Bennett in 2006 was identical to the Affidavit of Deb Stibbe in 2012 in this respect. Both calculated 15% interest from January 20, 2005. The Partial Summary Judgment does not identify an interest rate but sets a per diem interest of \$409.84 on the amount of \$1,341,022.36. This computes to be an annual rate of 11.155%. Clearly a rate of 8.9% was not used. Since the amount of \$1,341,022.36 included pre-judgment interest, a larger rate than 11.155% must have been used, probably 15% on the unpaid principal.
15. The Court calculates the balance due as follows:

Balance due as of January 5, 2005	\$1,052,588.76
Payment by Global Aerospace Ins. Co. November 21, 2005	(30,000.00)
Credit for value of aircraft as of February 2, 2006	(550,000.00)
Payment by XL Specialty Ins. Co. on October 6, 2006	(312,966.00)
Payment by XL Specialty Ins. Co. on October 7, 2008	(42,500.00)
Plus amount paid to Park Avenue Group, Inc. To satisfy prior lien November 1, 2011	140,000.00 ⁴
Plus repossession expenses November 1, 2011	33,393.35
Plus storage expenses for aircraft November 1, 2011	1,484.00
Interest at 8.9% from January 5, 2005 to January 20, 2005	3,849.75
Interest at 15% on \$1,052,588.76 from January 20, 2005 to November 21, 2005: \$432.57 x 305 days =	131,933.85
Interest at 15% on \$1,022,588.76 from November 21, 2005 To February 2, 2006: \$420.24 x 73 days=	30,677.52
Interest at 15% on \$472,588.76 from February 2, 2006 to October 6, 2006: \$194.21 x 246 days =	47,775.66

⁴ Defendants did not contest this and the remaining charges nor the date of November 1, 2011 used in Deb Stibbe's affidavit.



Interest at 15% on \$159,622.76 from October 6, 2006 to October 7, 2008: \$65.60 x 732 days=	48,019.20
Interest at 15% on \$117,122.76 from October 7, 2008 to November 1, 2011: \$48.13 x 1120 days =	53,905.60
Interest at 15% on \$292,000.11 from November 11, 2011 to January 28, 2013: \$120.00 x 444 days=	<u>53,280.00</u>
Total	\$ 661,441.69

16. Defendants argue that under Oregon law they are entitled to attorney's fees as the prevailing party. Oregon law is the choice of law per the parties' agreement. Section 20.77, O.R.S. provides:

(1) In any action or suit in which one or more claims are asserted for which an award of attorney fees is either authorized or required, the prevailing party on each claim shall be determined as provided in this section. ...

(2) ... [T]he prevailing party is the party who receives a favorable judgment ... on the claim. If more than one claim is made in an action or suit for which an award of attorney fees is either authorized, the Court ... shall:

(a) Identify each party that prevails on a claim for which attorney fees could be awarded.

Thereafter, the Court is directed to determine the amount of the award on each claim.

Section 20.096(1), O.R.S. provides in pertinent part:

In any action or suit in which a claim is made based on a contract that specifically provides that attorney fees and costs ... shall be awarded to one of the parties, the party that prevails on the claim shall be entitled to reasonable attorney fees...

17. The Oregon Courts have interpreted the statutes to provide that in the event of a claim and counterclaim for damages, the claims are set off and the party with the net award is the prevailing party. *Meduri Farms, Inc. v. Robert John Corp.*, 120 Or. App. 40, 852 P.2d 257 (Or. 1993). Here, the Plaintiff has prevailed to the extent it has a net amount due.

Case No. 05-198CA

Final Summary Judgment



18. The Defendants argue that their affirmative defense of unreasonable sale of the aircraft makes them the prevailing party. The Partial Summary Judgment has been reduced from a principal balance of \$1,052,588.76 to \$502,588.76. The Defendants argue that a different rule applies when the defense prevails on a defense for non-monetary relief. "When one party seeks non-monetary relief and the other party seeks damages, to determine who is the prevailing party, courts weigh what was sought by each party against the result obtained ... *Lawrence v. Peel*, 45 Or. App. 233, 243, 607 P.2d 1386 (1980)." *Meduri Farms, Inc. v. Robert John Corp.*, 120 Or. App. 40, 44, 852 P.2d 257 (1993).
19. In *Stein v. Burt & Vetterlein, P.C.*, 150 Or. App. 484, 946 P.2d 1168 (1997), the Court affirmed denial of attorney fees to a party whose claim for damages was reduced by 90%. In *Bowers and Bowers*, 136 Or. App. 112, 900 P.2d 1085 (1995), modified 143 Or. App. 24, 922 P.2d 722 (1996), despite a net award to the wife, the husband was awarded attorney fees because he prevailed in sustaining the antenuptial agreement and kept over \$60,000 from being counted as marital property, leaving only \$40,000 worth of marital property.
20. Plaintiff argues that a claim-by-claim analysis is different than an issue-by-issue analysis, and that the Court should not weigh the claims against the results obtained when the Defendant did not file a counterclaim.
21. The Defendants state that a set off is the same as a counterclaim citing Rule 1.110(a), Florida Rules of Civil Procedure. A review of the Oregon cases cited reveals that in every case, there was a claim and a counterclaim. Nevertheless, the Court finds that this circumstance is akin to the *Stein* and *Bowers* cases. The meaning of "claim" in Oregon law must be viewed in light of Florida Rules of Procedure. The Answer and Affirmative defenses did allege that Plaintiff was responsible for money damages and exemplary and punitive damages. It also alleged that the insurance proceeds would exceed the payment due. Therefore, the Court will weigh the outcomes of the competing claims and issues.
22. The Plaintiff filed suit to obtain collection on its note and guaranty. Defendants admitted the default but contested whether the sale of the aircraft was commercially reasonable. The litigation has not been as simple as the Defendants now suggest. The case was continuously litigated for seven years and a final judgment has not yet been entered. The Defendants effectively managed to frustrate the Plaintiff's prosecution of the case. XL Specialties Insurance Company filed an intervenor action because Sunrise disputed payment to Bancorp



of \$312,966.10 due under the policy. The Plaintiff ultimately prevailed on that claim. The Defendant succeeded in proving that the sale was not commercially reasonable, but the greater weight of the evidence established a value of the aircraft which allowed Plaintiff to obtain \$502,588.76 plus interest due from Defendants in addition to \$385,000 from insurance companies and \$100,000 from the sale and expenses. The total is \$987,588.76 plus interest and expenses. The overall prevailing party is the Plaintiff, although it did not prevail on every claim.

It is therefore ADJUDGED that:

- A. The pleadings and evidence on file show that there is no genuine issue as to any material fact and that the Plaintiff is entitled to a judgment as a matter of law against Defendants Sunrise and Klock.
- B. Plaintiff U.S. Bancorp Equipment Finance, Inc., recover from defendant Sunrise Air, Inc. and from Joseph P. Klock, Jr. the sum of \$117,122.76 on principal, \$174,877.35 for lien and repossession and storage expenses, and prejudgment interest in the sum of \$369,441.58, making a total of \$661,441.69 that shall bear interest at the rate of 4.75% a year, for which let execution issue.
- C. On this judgment the Defendants are granted a credit of \$58,504.62.
- D. The Court reserves jurisdiction to determine the amount of attorney fees and costs that U.S. Bancorp Equipment Finance, Inc., shall recover from Sunrise Air, Inc., and Joseph P. Klock, Jr., and for such other relief as the Court deems just and proper.

DONE AND ORDERED on January 28, 2013, at Stuart, Martin County, Florida.


F. Shields McManus, Circuit Judge

Copies by email to:

Richard B. Storfer, Esq., Riley W. Cirulnick, Esq., Rice Pugatch Robinson & Schiller, P.A., 101 NE Third Avenue, Suite 1800, Fort Lauderdale, FL 33301, counsel for Plaintiff, email rstorfer@rprsllaw.com ; lmcrae@rprsllaw.com; and rcirulnick@rprsllaw.com

Juan Carlos Antorcha, Esquire and Joseph P. Klock, Esq., Rasco Klock Reininger Perez Vigil & Nieto, P.S., 283 Catalonia Avenue, Miami, FL 33134, counsel for Defendants, email jantorcha@rascoklock.com; jklock@rascoklock.com; and ahochman@rascoklock.com .

Case No. 05-198CA

Final Summary Judgment

7



STATE OF FLORIDA
MARTIN COUNTY

THIS IS TO CERTIFY THAT THE
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CAROLYN TRIMMANN, CLERK
BY 
DATE 1-28-13 D.C.



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Detail by Entity Name

Foreign Profit Corporation

U.S. BANCORP EQUIPMENT FINANCE, INC.

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Changed: 04/09/2012

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Officer/Director Detail

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Annual Reports

Report Year	Filed Date
2009	04/10/2009
2010	02/16/2010
2011	01/04/2011

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HARVEY RUVIN, CLERK OF COURT, MIAMI-DADE COUNTY, FLORIDA

ORIGINAL
JUDGE ANTONIO ARZOLA

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 15-006853 CA (21)

MARIO CAPONE d/b/a MARIO'S
DRY CLEANING a/k/a MARIO'S,
an individual,

Plaintiff,

vs.

JOSEPH KLOCK,
an individual,

Defendant.

FINAL ORDERS AS TO ALL PARTIES
SRS DISPOSITION
NUMBER 2
THE COURT DISMISSES THIS CASE AGAINST
ANY PARTY NOT LISTED IN THIS FINAL ORDER
OR PREVIOUS ORDER(S). THIS CASE IS CLOSED
AS TO ALL PARTIES.
Judge's Initials lll

Judge Antonio Arzola
Circuit Court Judge

FINAL JUDGMENT

Pursuant to the verdict in this action,

IT IS ADJUDGED that Plaintiff, MARIO CAPONE, 5828 S.W. 71 Street, South Miami, FL 33143, recover from Defendant, JOSEPH KLOCK (Social Security Number ~~XXXXXXXX~~), 5095 S.W. 32 Street, Miami, FL 33143, the sum of \$18,639.16, which sum shall bear interest from this date forward at the legal rate of 4.84%, for which let execution issue.

IT IS FURTHER ORDERED AND ADJUDGED that Plaintiff is entitled to court costs and attorneys' fees against Defendant which shall be taxed pursuant to a Motion under Rule 1.525, Fla. R. Civ. P. Jurisdiction in this case is retained to enter further orders that are proper concerning court costs and attorneys' fees upon the filing of a proper motion(s). @

* This figure consists of the following: verdict/contract
\$ 10,364.08 ; prejudgment interest \$ 2,175.08 ; treble
damages \$ 6,000 ; and \$ 100 statutory service charge.

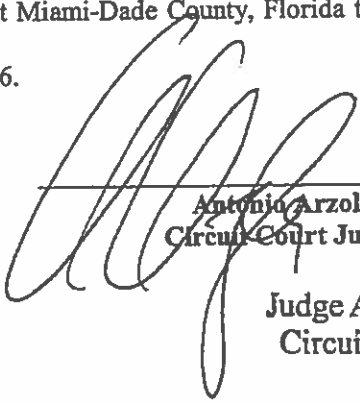
A TRUE COPY
CERTIFICATION ON LAST PAGE

Page 2 of Final Judgment
Case No. 15-006853 CA (21)

IT IS FURTHER ORDERED AND ADJUDGED that the judgment debtor shall complete under oath Florida Rule of Civil Procedure Form 1.977 (Fact Information Sheet), including all required attachments, and serve it on the judgment creditor's attorney, or the judgment creditor if the judgment creditor is not represented by an attorney, within 45 days from the date of this final judgment, unless the final judgment is satisfied or post-judgment discovery is stayed.

Jurisdiction of this case is retained to enter further orders that are proper to compel the judgment debtor to complete Form 1.977, including all required attachments, and serve it on the judgment creditor's attorney, or the judgment creditor if the judgment creditor is not represented by an attorney.

DONE AND ORDERED in Chambers at Miami-Dade County, Florida this 25th day of July, 2016.




Antonio Arzola
Circuit Court Judge

Judge Antonio Arzola
Circuit Court Judge

Copies furnished:

Bruce D. Fischman, Esquire
Susan E. Klock, Esquire

STATE OF FLORIDA, COUNTY OF DADE
I HEREBY CERTIFY that the foregoing is a true and correct copy of the original on file in this office. 07/25/16 AD 20 16
HARVEY RUVIN, Clerk of Circuit and County Courts
Deputy Clerk 



2-37480

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA**

Case No.:15-006853 CA 21

MARIO CAPONE,

Plaintiff,

vs.

THE HONORABLE ANTONIO ARZOLA

JOSEPH KLOCK,

Defendant.

NOTICE OF APPEAL

NOTICE IS GIVEN that JOSEPH KLOCK, Defendant, appeals to the District Court of Appeal, Third Circuit, the Order of Final Judgment and Order Denying Motion for Judgment Notwithstanding the Verdict of this Court both rendered July 25, 2016. Copies of the Orders are attached as Exhibits "A" and "B", respectively.

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via Florida Courts E-Filing Portal, which will serve a copy via e-mail upon all counsel of record, on this 16th day of August, 2016.

Respectfully submitted,

Miguel A. Morel, Esq. FBN 89163
mmorel@rascoklock.com
RASCO KLOCK PEREZ NIETO
2555 Ponce de Leon Blvd., Suite 600
Coral Gables, Florida 33134
305.476.7111
305.675.7707 (Fax)

By: /s/ Miguel A. Morel
Miguel A. Morel

EXHIBIT A

CFN: 20160435092 BOOK 30166 PAGE 489
DATE 07/26/2016 04 06 23 PM
HARVEY RUVIN, CLERK OF COURT

ORIGINAL
MIA-DADE
JUDGE ANTONIO A

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 15-006853 CA (21)

MARIO CAPONE d/b/a MARIO'S
DRY CLEANING a/k/a MARIO'S,
an individual,

Plaintiff,

vs.

JOSEPH KLOCK,
an individual,

Defendant.

FINAL ORDERS AS TO ALL PARTIES
SRS DISPOSITION
NUMBER 2
THE COURT DISMISSES THIS CASE AGAINST
ANY PARTY NOT LISTED IN THIS FINAL ORDER
OR PREVIOUS ORDER(S). THIS CASE IS CLOSED
AS TO ALL PARTIES.
Judge's Initials lll

Judge Antonio Arzola
Circuit Court Judge

FINAL JUDGMENT

Pursuant to the verdict in this action,

IT IS ADJUDGED that Plaintiff, MARIO CAPONE, 5828 S.W. 71 Street, South Miami, FL 33143, recover from Defendant, JOSEPH KLOCK (Social Security Number 7003), 5095 S.W. 42 Street, Miami, FL 33143, the sum of \$18,639.16*, which sum shall bear interest from this date forward at the legal rate of 4.84%, for which let execution issue.

IT IS FURTHER ORDERED AND ADJUDGED that ~~Plaintiff is entitled to court costs and attorneys' fees against Defendant which shall be taxed pursuant to a Motion under Rule 1.525, Fla. R. Civ. P.~~ Jurisdiction in this case is retained to enter further orders that are proper concerning court costs and attorneys' fees upon the filing of a proper motion(s). @

* This figure consists of the following: verdict/contract
\$ 10,364.08 ; prejudgment interest \$ 2,175.08 ; treble
damages \$ 6,000 ; and \$100 statutory service charge.

Page 2 of Final Judgment
Case No. 15-006853 CA (21)

IT IS FURTHER ORDERED AND ADJUDGED that the judgment debtor shall complete under oath Florida Rule of Civil Procedure Form 1.977 (Fact Information Sheet), including all required attachments, and serve it on the judgment creditor's attorney, or the judgment creditor if the judgment creditor is not represented by an attorney, within 45 days from the date of this final judgment, unless the final judgment is satisfied or post-judgment discovery is stayed.

Jurisdiction of this case is retained to enter further orders that are proper to compel the judgment debtor to complete Form 1.977, including all required attachments, and serve it on the judgment creditor's attorney, or the judgment creditor if the judgment creditor is not represented by an attorney.

DONE AND ORDERED in Chambers at Miami-Dade County, Florida this 25th day
of July, 2016.



Antonio Arzola
Circuit Court Judge

Judge Antonio Arzola
Circuit Court Judge

Copies furnished:

Bruce D. Fischman, Esquire
Susan E. Klock, Esquire

EXHIBIT B

ORIGINAL
JUDGE ANTONIO ARZOLA

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: 15-006853 CA (21)

MARIO CAPONE d/b/a MARIO'S
DRY CLEANING a/k/a MARIO'S,
an individual,

Plaintiff,

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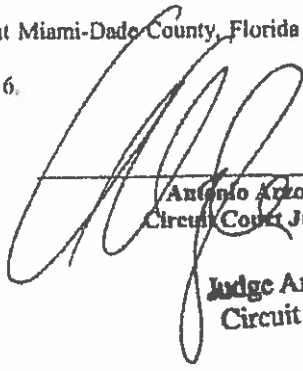
2016 JUL 25 PM 2:33
CLERK OF COURT
STATE OF FLORIDA
11TH JUDICIAL CIRCUIT
MIAMI, FLORIDA

**ORDER ON DEFENDANT'S MOTION FOR JUDGMENT NOTWITHSTANDING
THE VERDICT AND FOR ENTRY OF JUDGMENT**

THIS CAUSE came on to be heard before this Court on July 25, 2016, upon the Defendant's Motion for Judgment Notwithstanding the Verdict and for Entry of Judgment and the Court having heard argument of counsel and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED as follows: Denied. ON THE VERDICT FORM, PLAINTIFF IS ENTITLED TO \$10,364.08 ONLY FOR BREACH OF CONTRACT QUESTIONS 1-5 PLUS FEES AND COSTS. PLAINTIFF HAS ELECTED BREACH OF CONTRACT OVER QUANTUM MERUIT, SO NO JUDGMENT WILL BE ENTERED FOR QUANTUM MERUIT. PLAINTIFF MAY ONLY COLLECT \$10,364.08 FOR BREACH OF CONTRACT, OPEN ACCOUNT AND AS AMOUNT STATED. WITH REGARD TO F.S. 68.065 THE COURT AGREES WITH NO JURY VERDICT Q. 12 AND ALSO FINDS THAT DEFENDANT'S FEE DID NOT INCLUDE COURT COSTS.

DONE AND ORDERED in Chambers at Miami-Dade County, Florida this 25th day
of July, 2016.



Antonio Arzola
Circuit Court Judge

Judge Antonio Arzola
Circuit Court Judge

Copies furnished:

Bruce D. Fischman, Esquire
Susan E. Klock, Esquire

Third District Court of Appeal Case Docket

Case Number: 3D16-1944

Final Civil Other Notice from Dade County

JOSEPH KLOCK vs. MARIO CAPONE

Lower Tribunal Case(s): 15-6853

[Right-click to copy shortcut directly to this page](#)

01/08/2017 04:53

Date Docketed	Description	Date Due	Filed By	Notes
08/23/2016	Notice of Appeal Filed		Miguel A. Morel 89163	
08/23/2016	Acknowledgment Letter			Acknowledgment of new case with attachments. ** The \$300 filing fee for an appeal is due.
08/23/2016	Notice of Transmittal--NOA		Miami-Dade Clerk	
08/25/2016	Case Filing Fee			FILING FEE FOR NOTICE OF APPEAL.
10/11/2016	Received Records			6 VOLUMES.
10/25/2016	Mot. for Extension of time to file Initial Brief		Miguel A. Morel 89163	
10/25/2016	Clerk's notice granting eot (CLKEX)	12/09/2016		IB-45 days to 12/9/16
12/12/2016	Notice of Appearance		Susan Elizabeth Klock 41294	
12/12/2016	Mot. for Extension of time to file Initial Brief		Susan Elizabeth Klock 41294	
12/16/2016	Extension Granted for Initial Brief (OGO3)			Appellant's motion for an extension of time to file the initial brief is granted to and including thirty (30) days after receipt of the transcripts.

3351

Department of the Treasury - Internal Revenue Service

Form 668 (Y)(c)
(Rev. February 2004)

Notice of Federal Tax Lien

Area:
SMALL BUSINESS/SELF EMPLOYED AREA #3
Lien Unit Phone: (800) 829-3903

Serial Number
984832114

For Optional Use by Recording Office



CFN 2014R0151428
OR Bk 29049 Pg 0783; (1pg)
02/25/2014 12:00:01
HARVEY RUVIN, CLERK OF COURT
MIAMI-DADE COUNTY, FLORIDA
LAST PAGE

As provided by section 6321, 6322, and 6323 of the Internal Revenue Code, we are giving a notice that taxes (including interest and penalties) have been assessed against the following-named taxpayer. We have made a demand for payment of this liability, but it remains unpaid. Therefore, there is a lien in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.

Name of Taxpayer JOSEPH P JR KLOCK

Residence 5095 SW 82ND ST
MIAMI, FL 33143-8503

IMPORTANT RELEASE INFORMATION: For each assessment listed below, unless notice of the lien is refiled by the date given in column (e), this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).

Kind of Tax (a)	Tax Period Ending (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
CIVP	06/30/2010	XXX-XX-7003	06/03/2013	07/03/2023	58897.95
CIVP	09/30/2010	XXX-XX-7003	06/03/2013	07/03/2023	22765.87

Place of Filing County Courthouse
Dade County
Miami, FL 33130

Total \$ 81663.82

This notice was prepared and signed at BALTIMORE, MD, on this,

the 13th day of February, 2014.

Signature
for P.A. BELTON

Title ACS SBSE 23-00-008
(800) 829-3903

(NOTE: Certificate of officer authorized by law to take acknowledgment is not essential to the validity of Notice of Federal Tax Lien Rev. Rul. 71-486, 1971 - 2 C.B. 409)

Part 1 - Kept By Recording Office

Form 668(Y)(c) (Rev. 2-2004)
CAT. NO 60025X

10194

Department of the Treasury - Internal Revenue Service

Form 668 (Y)(c)
(Rev. February 2004)

Notice of Federal Tax Lien

Area: SMALL BUSINESS/SELF EMPLOYED AREA #3 Lien Unit Phone: (800) 913-6050	Serial Number 148261515	For Optional Use by Recording Office
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As provided by section 6321, 6322, and 6323 of the Internal Revenue Code, we are giving a notice that taxes (including interest and penalties) have been assessed against the following-named taxpayer. We have made a demand for payment of this liability, but it remains unpaid. Therefore, there is a lien in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.

CFN 2015R0200493
OR Bk 29555 Pg 3220 (1pg)
03/27/2015 14:18:13
HARVEY RUVIN, CLERK OF COURT
MIAMI-DADE COUNTY, FLORIDA
LAST PAGE

Name of Taxpayer JOSEPH P JR KLOCK

Residence 2555 PONCE DE LEON BLVD SUITE 600
CORAL GABLES, FL 33134-6010

IMPORTANT RELEASE INFORMATION: For each assessment listed below, unless notice of the lien is refiled by the date given in column (e), this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).

Kind of Tax (a)	Tax Period Ending (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/2006	XXX-XX-7003	04/28/2014	05/28/2024	978880.88
1040	12/31/2007	XXX-XX-7003	04/02/2012	05/02/2022	
1040	12/31/2007	XXX-XX-7003	04/28/2014	05/28/2024	195357.11
1040	12/31/2008	XXX-XX-7003	04/28/2014	05/28/2024	478038.05
1040	12/31/2009	XXX-XX-7003	04/28/2014	05/28/2024	604433.90
1040	12/31/2010	XXX-XX-7003	04/28/2014	05/28/2024	1294859.61

Place of Filing County Courthouse Dade County Miami, FL 33130	Total \$ 3551569.55
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This notice was prepared and signed at BALTIMORE, MD, on this,the 17th day of March, 2015.

Signature for MR. C.D. BAILEY	<i>Chief Cordery</i>	Title REVENUE OFFICER (954) 423-7374	23-08-1818
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(NOTE: Certificate of officer authorized by law to take acknowledgment is not essential to the validity of Notice of Federal Tax Lien
Rev. Rul. 71-466, 1971 - 2 C.B. 409)

Part 1 - Kept By Recording Office

Form 668(Y)(c) (Rev. 2-2004)
CAT. NO 60025X

Area: **SMALL BUSINESS/SELF EMPLOYED AREA #3** Serial Number **199243816**
 Lien Unit Phone: (800) 913-6050 For Optional Use by Recording Office

As provided by section 6321, 6322, and 6323 of the Internal Revenue Code, we are giving a notice that taxes (including interest and penalties) have been assessed against the following-named taxpayer. We have made a demand for payment of this liability, but it remains unpaid. Therefore, there is a lien in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.


CFN 2016R0143307
 OR Bk 29991 Pg 4543; (1 pg)
 03/09/2016 09:20:27
 HARVEY RUVIN, CLERK OF COURT
 MIAMI-DADE COUNTY, FLORIDA

Name of Taxpayer **JOSEPH P JR KLOCK**

Residence **2555 PONCE DE LEON BLVD SUITE 600
 CORAL GABLES, FL 33134-6010**

IMPORTANT RELEASE INFORMATION: For each assessment listed below, unless notice of the lien is refiled by the date given in column (e), this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).

Kind of Tax (a)	Tax Period Ending (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/2011	XXX-XX-7003	01/11/2016	02/10/2026	1660390.41
1040	12/31/2012	XXX-XX-7003	01/11/2016	02/10/2026	811693.63

Place of Filing **County Courthouse
 Dade County
 Miami, FL 33130** Total \$ **2472084.04**

This notice was prepared and signed at **BALTIMORE, MD**, on this, the **17th** day of **February**, **2016**.

Signature *Cheryl Cordaro*
 for **MR. C.D. BAILEY** Title **REVENUE OFFICER** **23-08-1818**
(954) 423-7374

(NOTE: Certificate of officer authorized by law to take acknowledgment is not essential to the validity of Notice of Federal Tax lien Rev. Rul. 71-466, 1971 - 2 C.B. 409) Part 1 - Kept By Recording Office Form 668(Y)(c) (Rev. 2-2004) CAT. NO 60025X

IRS CENTRALIZED LIEN OPERATION CONTACT INFORMATION

Please contact the Centralized Lien Operation with any questions or concerns regarding lien documents using the following information:

Mailing address: Internal Revenue Service
Centralized Lien Operation
P.O. Box 145595
Stop 8420G
Cincinnati, OH 45250-5595

Toll free phone number for taxpayers: 1-800-913-6050

Toll free phone number for recording offices: 1-800-913-4170

CENTRALIZED LIEN OPERATION

The Centralized Lien Processing Operation at the Cincinnati IRS Campus is part of the Small Business/Self-Employed (SB/SE) Campus Compliance Services Operations (CCSO) Division.

Employees in this department send out Notices of Federal Tax Lien to recording offices for filing. They also process requests for all notices of lien and releases. Employees handle telephone inquiries and correspondence from taxpayers, their representatives and recording offices. They also assist IRS field personnel with processing certain lien documents related to the Notice of Federal Tax Lien such as amendments, withdrawals, refiles, and revocations.

The Centralized Lien Operation staff is authorized by the IRS to contact recording offices for the purpose of resolving problems concerning the filing of Notices of Federal Tax Lien, Notices of Federal Estate Tax Lien, and related documents. They are authorized access to all federal tax information contained in, and related to, such notices of lien and related documents. Recording offices may disclose information contained in such notices of lien and documents, to the extent necessary to resolve any problems, with and only with those employees.