

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

SKENDER HOTI,

Civil Docket No.

Plaintiff,

**VERIFIED COMPLAINT: 42 USC SEC. 1983
ET SEQ. AND OTHER RELIEF**

v.

JURY TRIAL DEMANDED

Barkley Master Association, Inc., a Florida
Not for profit corporation, Michael Swope,
Barkley Master Association President and
retired Police Officer, County of Palm Beach,
Palm Beach Sheriff's Office, The Levine Law
Group, John and Jane Doe defendants,

Defendants.

To the Honorable U.S. District Judges for the Southern District of Florida:

COMES NOW Plaintiff Skender Hoti before these Honorable Courts, respectfully complaining
of Defendants, averring in support thereof as follows:

INTRODUCTION

1. This is a federal civil rights action brought by Plaintiff Skender Hoti to seek damages and relief for violations of fundamental rights secured by the by the US Constitution under the 1st, 5th, and 14th Amendments and for violations of 42 USC Sec. 1983 in relation to the deprivation and violation of fundamental rights to due process under law, procedural and substantive, under the Equal Protection of the laws and the pursuit of life, liberty and property, for freedom of expression and association and related rights.

2. Plaintiffs seek an award of actual damages, general and compensatory damages for violations of rights, privileges and immunities including but not limited to due process of law both procedurally and substantively, freedom of speech, expression and association, vocal advocacy for the rights of the elderly without retaliation, and enjoy natural parts of life, pain, suffering, mental and emotional distress and applicable fees, costs and interests as allowed by law.
3. Plaintiffs also assert supplemental jurisdiction over pendent state law claims for unlawful taking of property and real property interests, interference in right to contract, wrongful foreclosure, false billing schemes, fabrication of evidence, harassment, negligence, negligent interference,

JURISDICTION

4. Plaintiffs claim federal jurisdiction pursuant to Article III § 2 which extends the jurisdiction to cases arising under the U.S. Constitution. This action is brought pursuant to 42 U.S.C. § 1983 to redress the deprivation, under color of state law, of rights secured by the Constitution of the United States, including under the First, Fifth, Eighth, Ninth, and 14th Amendments, and federal question jurisdiction. Thus, this Court has jurisdiction of this action pursuant to 28 U.S.C. § 1331.

5. The Court has supplemental jurisdiction over the State law claims alleged under 28 USC Sec. 1367 as the state and federal claims derive from a common nucleus of operative facts so that Plaintiffs would ordinarily be expected to try them all in one judicial proceeding.

VENUE

6. The venue lies in this district pursuant to 28 U.S.C. § 1391 as a substantial part of the events or omissions giving rise to this claim occurred in this District giving rise to this claim, occurred in Palm Springs, Lake Worth, West Palm Beach and generally within Palm Beach County of , Florida all located within the Southern District for Florida.

7. Plaintiffs submit that they have fulfilled all notice requirements and conditions precedent for filing suit or that such are not applicable.

JURY DEMAND

8. Plaintiffs seek and demand a Trial by Jury on each and every cause of action and claim set out herein.

PARTIES

9. I am Plaintiff Skender Hoti of 3103 Drew Way, Palm Springs, Florida 33406 located within the County of Palm Beach.

10. Upon information and belief, Defendant Barkley Master Association Inc., a Florida not for profit corporation, located at 2605 Barkley Master Drive, West Palm Beach, Fl 33415, hereinafter referred to as “Barkley Master”.

11. Upon information and belief, at all relevant times herein, Michael Swope is the Barkley Master Association President and a retired Police officer with an address at 2605 Barkley Master Drive, West Palm Beach, Fl 33415.

12. Upon information and belief, the Defendants Levine Law Group are located at 3300 PGA Blvd Suite 430, Palm Beach Gardens, Fl 33410, Tel 561-627-3585 and have acted as agents, employees and debt collectors for Defendants Barkley Master and Michael Swope and have furthered the false billing scheme and illegal actions against Plaintiff herein.

13. Upon information and belief, the Defendant County of Palm Beach is a governmental unit within the State of Florida located at 301 N. Olive Avenue, West Palm Beach, FL 33401.

14. Upon information and belief, the Defendant Palm Beach Sheriff's Office (hereinafter "PBSO") is a governmental unit within the County of Palm Beach within the State of Florida located at Headquarters: 3228 Gun Club Road West Palm Beach, FL 33406, General: (561) 688-3000, <http://www.pbso.org/>.

15. Upon information and belief, John and Jane Doe defendants exist both being state actors and private persons acting in concert with state actors.

FACTS APPLICABLE TO ALL PARTIES

16. At all times relevant herein Plaintiff Skender Hoti has been an “Owner” of Units in the Barkley Master Association, Inc. since on or around 2005 as further described herein.

17. Plaintiff is owner of Unit B, 2591, Barkley Drive West, West Palm Beach, Fl 33415, hereinafter referred to as “Unit B”.

18. The scheme of False billing and wrongful conduct by Barkley Master and false evidence for Unit B has occurred in the following State court cases in Palm Beach County:

_____. Plaintiff has suffered approximately \$24,000.00 in lost rent since on or about August of 2016 and loss sale value of approximately \$75,000. Plus fees costs and damages and incidental damages.

19. Plaintiff is Owner of Unit C, 2591 Barkley Drive West, West Palm Beach, Fl 33415, hereinafter referred to as “Unit C”.

20. The scheme of False billing and wrongful conduct by Barkley Master and false evidence for Unit C has occurred in the following State court cases in Palm Beach County:

_____.

21. Plaintiff is beneficial owner with power of attorney and management rights of Unit D, 2641 Barkley Drive West, West Palm Beach, Fl 33415 hereinafter referred to as “Unit D”.

22. The scheme of False billing and wrongful conduct by Barkley Master and false evidence for Unit D has occurred in the following State court cases in Palm Beach County, CASE

NUMBER: 50-2015-CA-006055-XXXX-MB CASE STYLE: BARKLEY MASTER
ASSOCIATION INC V AMETI, FATIME.

23. Upon information and belief, the Defendants County of Palm Beach and PBSO have a pattern, practice, municipal policy and custom of using the machinery of government to target individuals and apply the laws and powers of government in violation of due process and equal protection of the laws in favor of state actor political office holders and former office holders, State Judges and former State judges in Palm Beach County and others including but not limited to former state actor and Judge Martin Colin.

24. Upon information and belief, at all times relevant herein since on or about 2012 or earlier to the present, Plaintiff Skender Hoti has been targeted by these practices, policies and customs in and by Palm Beach County and County PBSO and Palm Beach State Court actors in violation of fundamental due process rights and equal protections of the law.

25. Upon information and belief, according to the Investigation by John Pacenti of the Palm Beach Post, "In a remarkable document, Savitt's bill filed with the court shows she worked as a hired hand for Batson's brother to spirit Batson to Alabama. The bill indicates Savitt spied on Hoti at the restaurant he owns to make sure she could operate unencumbered and take possession of valuables from the Batson residence."

26. Upon information and belief, being the Investigation by the Palm Beach Post, Betsy Savitt has all times relevant herein been the wife of state actor and former Judge Martin Colin of Palm Beach County.

27. Upon information and belief, the source being an official Department of Justice press release, federal indictments have been issued and an ongoing investigation into fraud in real estate and foreclosures in Palm Beach county covering at least relevant years herein from 2012 to 2015.

28. “A federal grand jury in West Palm Beach returned an indictment yesterday against three high-volume Florida real estate investors for conspiring to rig bids submitted through the online property foreclosure auction process, the Department of Justice announced.

29. The indictment, filed in the U.S. District Court for the Southern District of Florida, charges Avi Stern, Christopher Graeve, and Stuart Hankin with conspiring to rig bids during online auctions in Palm Beach County, Florida in order to obtain foreclosed properties at suppressed prices. The indictment alleges that the conduct took place from at least January 2012 until June 2015. These charges have been filed as a result of the ongoing investigation being conducted by the Antitrust Division’s Washington Criminal I Section and the FBI’s Miami Division – West Palm Beach Resident Agency. Anyone with information concerning bid rigging or fraud related to public real estate foreclosure auctions should contact the Washington Criminal I Section of the Antitrust Division at 202-307-6694 or www.justice.gov/atr/contact/newcase.html.”

30. Upon information and belief, the US Justice Department (hereinafter “DOJ”) plead in one of the indictments, “The United States experienced a severe financial crisis and recession beginning in 2008. One of the industries hit hardest by the recession was the housing industry. In the years after the recession began, millions of people became delinquent on their mortgage payments, and

financial institutions were forced to foreclose on millions of their homes, including in the Southern District of Florida.” See,

<https://www.justice.gov/opa/press-release/file/1008621/download>.

31. At all times relevant herein, Plaintiff Skender Hoti has been within the class of persons in the Southern District of Florida impacted by the financial recession and banking industry scandal.

32. Upon information and belief, the wrongful scheme and pattern of violations by the Defendants herein have harmed Plaintiff Skender Hoti in my real estate interests, credit and financial equity holdings and in the general pursuit of life liberty and property under the US Constitution.

33. Upon information and belief and in part upon direct knowledge, direct reporting of the wrongs against me and my holdings, property and business starting with Judge Colin and Betsy Savitt in 2012 lead to a series of Investigative journal articles by John Pacenti of the Palm Beach Posts and other shakeups in the Palm Beach County Court system.

34. Upon information and belief, Plaintiff has continued to be targeted by continuing and ongoing wrongful schemes within the Palm Beach County and Palm Beach County Court system

similar to the organized criminal style of the shakedown and taking of Plaintiff's properties by Judge Martin Colin and wife Betsy Savitt shown by the Palm Beach Post articles described herein.

35. Upon information and belief, the Post published the following article, **Professional guardian's lawyer empties man's home**, By John Pacenti

Updated: 5:47 p.m. Friday, April 03, 2015 | Posted: 5:47 p.m. Friday, April 03, 2015

<https://www.mypalmbeachpost.com/news/professional-guardian-lawyer-empties-man-home/Ks1BZu5Aq0pEohOWiKZYiO/>.

36. Upon information and belief, the article found: "One afternoon three years ago, Skender Hoti received an unusual call from a neighbor asking whether he was moving out of his Lake Worth home."

37. "Hoti rushed to the house to find a moving truck packed with furniture, heirlooms and valuables owned by him and the elderly woman he called mom. The lock on his front door was bashed in and the house ransacked."

38. "But this wasn't breaking and entering by a street thug. This was an attorney operating under a court-ordered guardianship."

39. "Hoti's 'mom' was deemed incapacitated by a judge at the behest of her brother, Kenneth Davis, who along with his wife were granted temporary guardianship by Palm Beach County Circuit Judge Martin Colin."

40. "When I went to my room, I was in tears. I didn't see my gun, I didn't see any of my jewelry.

The wedding chain for my wife, which is traditional for us, was gone,” said Hoti, who was born in the country now known as Kosovo and has lived in Palm Beach County since the early 1980s.”

41. “How can you allow this to happen in America? I lived in a communist country and they wouldn’t even do this.”

42. “Court records shows that there was no legally required examination of Batson within five days of the appointment of temporary guardians to determine whether she was incapacitated by Alzheimer’s disease.”

43. “Deputies ordered Hazeltine, against her strenuous objections, to return all the items taken from Hoti’s home after he proved he had title to the house, according to an offense report. Hoti claims many of the valuables are still missing and there were at least three confrontations between the parties at the home.”

44. “This was breaking and entering. This was part of the scam,” Hoti said.

45. “Hoti’s case, though, shows the power a probate attorney can wield through the family member serving as guardian.”

46. “Kathy Graves, the neighbor who alerted Hoti to the moving van, said she came into his house and confronted Hazeltine and those assisting her. “I told them at some point I was a real estate agent and they said we might want to put this property on the market. They asked me how much the home was worth,” she said.”

47. “Hoti’s former attorney Debra Rochlin of Fort Lauderdale was also highly critical of

Hazeltine, saying the elder law attorney “just made up stuff as she went along.”

48. “It was a miracle the judge (Martz) saw the light and saw what was going on. He understood. He was upset,” she said. “I think what happened to Skender was a crime

49. “Chief judge investigating Post’s findings on Colin, Savitt, By John Pacenti -

Palm Beach Post Staff Writer Updated: 7:06 p.m. Wednesday, January 20, 2016 | Posted: 6:52 p.m. Wednesday, January 20, 2016.

<https://www.mypalmbeachpost.com/news/chief-judge-investigating-post-findings-colin-savitt/EZIEUntckLFsLboCn86YvL/>

50. “The chief judge for Palm Beach County said Wednesday that he is investigating what needs to be done to address concerns brought forth by The Palm Beach Post’s stories on Circuit Judge Martin Colin’s role in adult guardianship

51. Colin oversees family and probate matters in Delray Beach, including guardianships of adults no longer able to care for themselves. Colin’s wife, Elizabeth “Betsy” Savitt, is a former tennis pro turned professional guardian who operates in the same division and appears in front of Colin’s colleagues.

52. But Colbath and the chief judge before him, Peter Blanc, took no action to eliminate potential conflicts caused by the close relationships in the south county courthouse.

53. Several families separately told The Post that Savitt openly cites her husband’s powerful position when confronted over her actions.

54. Savitt does not appear directly in front of her husband, but the attorneys who represent her litigated cases in front of him and relied on him at times to approve lucrative fees.

55. Two former Florida Supreme Court justices and a legal ethics expert told The Post the relationships pose a conflict of interest and appear improper.

56. After The Post started investigating last year, Colin recused himself from 115 cases in six months involving those attorneys who represent Savitt in guardianships, such as Ellen Morris, Sheri Hazeltine and John Pankauski, The Post reported Sunday. Previously, Colin said he required the attorneys to disclose their professional relationship with his wife, but The Post found that didn't happen in at least one case.

57. The families of some of Savitt's current and former wards did not hold back.

58. "They should be moved out of probate, and if possible, moved off the bench," said Jodi Rich, niece of Robert Paul Wein, who was in a Savitt guardianship before he died at 89 on Dec. 1.

59. "They are not abiding by ethical standards," she said.

60. Thomas Mayes, whose mother, Helen O'Grady, was in a Savitt guardianship, said there needs not only to be further guardianship reform by state lawmakers but a criminal investigation into Savitt. He doubted, though, anything would be done.

61. “They will just sweep the dirt under the rug or in a corner,” he said.

62. Skender Hoti, a Lake Worth restaurant owner, watched Savitt in February 2012 try to assist a family guardian in seizing nearly every possession in a house he owned before she was stopped by sheriff’s deputies.

63. “All their cases should be reviewed,” he said of Colin and French. “No judge should be able not to rotate and stay in the probate arena.”.

64. Gwen Batson: Savitt clears house with husband's order,

<https://www.mypalmbeachpost.com/guardianships-elizabeth-savitt/>.

65. “In a case The Post wrote about in April, Savitt along with attorney Sheri Hazeltine — who represents Savitt in many cases — hauled out belongings from Gwendolyn Batson’s Lake Worth home. Photos show they took nearly everything but the chandelier. Wearing badges with the word “guardian,” they invoked an order signed by Judge Colin, witnesses told The Post.

66. “Colin’s order appointed Batson’s brother and sister-in-law as emergency temporary guardians for Batson in late January 2012, court records show. That decision would be reversed by a successor judge, but not before Savitt and Hazeltine in mid-February broke the lock on the home that Batson lived in and seized all of the belongings.”

67. “It turned out the home and much of the property seized didn’t belong to Batson but to restaurateur Skender Hoti, a Kosovo native who had taken care of Batson for decades. To get appointed emergency temporary guardian, Batson’s brother, Kenneth Davis, claimed Hoti had taken financial advantage of his sister. Colin agreed, noting in his order that immediate action

needed to be taken to safeguard Batson's belongings."

68. "Savitt and her attorney cleared out the home where Gwen Batson lived. But it was her adopted son Skender Hoti's house. Hoti says most of what they took was his."

69. "Davis used Colin's order — employing the judge's wife to help — to seize all the possessions in the home where his sister lived."

70. "As Savitt and others moved items into a truck, Hoti called sheriff's deputies who stopped them."

71. "The two argued that they had authority from Judge Colin but the deputies said the order was insufficient, that they needed what is called a writ of possession."

72. "Hoti said he saw Savitt scream at deputies: "You can't do that. I'm a judge's wife. I'm Judge Colin's wife."

73. "Three days after the seizure of Hoti's property, Colin recused himself from the case."

74. "Savitt wasn't Batson's guardian, yet Judge French approved paying her \$1,500 of Batson's money. The clerk questioned the expenditure more than a year after the house was cleared out and then Savitt submitted a bill, court documents show."

75. "Hoti said even though deputies made them return his possessions, he later found valuables missing: jewelry, firearms and about \$18,000 in cash."

76. "Last summer, Hoti said he filed an additional complaint about Savitt with the sheriff's office."

77. "In a remarkable document, Savitt's bill filed with the court shows she worked as a hired hand for Batson's brother to spirit Batson to Alabama."

78. “The bill indicates Savitt spied on Hoti at the restaurant he owns to make sure she could operate unencumbered and take possession of valuables from the Batson residence.”

Barkley Master Association

79. Through a series of actions involving both state actors and private defendants, the defendants have engaged in a systematic pattern of false billing and illegal tactics to choke the lifeblood, credit, equity, cashflow and income of Plaintiff Skender Hoti.

80. At all times relevant herein, Plaintiff Skender Hoti had no issues getting “Approval” of prospective Tenants for the various units at Barkley for on or about 10 years until on or about August of 2016.

81. During this same period of time in 2016 to the present, Plaintiff Skender Hoti has been fighting years of a similar false billing scheme that began as a result of the state actor Martin Colin case and Betsy Savitt action dating back to 2012 and 2013 when Plaintiff’s former attorney David Garten sued Plaintiff for false billing.

82. The false billing scheme has been shown in Palm Beach County cases where Defendant Hoti has been continuously denied due process hearings to challenge the false billings in the Palm Beach County Court system.

83. During the time of representation in the Colin-Savitt case by attorney Garten, this attorney would show up at my restaurant and commercial property on Military Trail in Palm Beach

County demanding and extorting large sums of money shake down style for the Colin case.

84. Plaintiff's challenges to the false billing scheme from the Garten case have been continuous and ongoing throughout the same period of time between 2015 to the present while Plaintiff has continued to fight the false billing scheme by the Barkley Master Defendants herein.

85. On or about May of 2015, Defendants Barkley Master Association employed Defendants Levine Law Group to initiate 3 Foreclosure actions in Palm Beach County against Plaintiff's interests in Units B, C, and D as described herein:

86. By on or about June 20, 2015, Plaintiff filed and answer and affirmative defenses in the Barkley Foreclosure Palm Beach County State Court cases seeking to voluntarily satisfy any legitimate fee and debt owed and seeking Mediation in the Court proceedings.

87. Despite filing a specific court answer in these cases in June of 2015 that indicated Plaintiff was seeking all complete billings to satisfy any legitimate debt or fee, Plaintiff has been consistently denied full and proper billings by Defendants Barkley Master and President Swope from June of 2015 to the present.

88. On or about August 4th of 2016, at an in person meeting with new Barkley Master Manager Shelly Sinclair, Plaintiff Skender Hoti was informed his total outstanding payments owed to Barkley Master was \$2300.00 total.

89. On such date of August 4, 2016, Plaintiff Skender Hoti issued 2 checks to Barkley Master delivered in person to Manager Sinclair with one check made out for \$1100.00 and a second check made out for \$1200.00 to pay all balances in full to Barkley Master.

90. Upon information and belief, the source of such information coming from banking records and records provided by Barkley Master attorneys, both checks cleared and were fully paid to Barkley Master.

91. Plaintiff reasonably believed that all proper fees and debts and costs owed to Defendant Barkley Master had been satisfied at that time in August of 2016.

92. Instead, within a short time later Barkley Defendant Manager Shelly Sinclair began a campaign to harass prospective and current tenants of Plaintiff Hoti and falsely claiming over \$10,000 plus in fees were now owed allegedly including fees paid to Defendant Levine Law Group.

93. Defendants Barkley Master and agent Manager Shelly Sinclair then began a campaign of harassment against Plaintiff's tenants and prospective tenants denying Plaintiff the proper rights to rent and use and maximize his properties since on or about August of 2016 to the present resulting in loss rents and profits and other damages to Plaintiff.

94. The scheme has included harassing actions such as mounting garbage up in front of other units and verbally harassing Plaintiff in front of tenants and prospective tenants since on or around 2016.

95. Plaintiff has continued to report these actions to law enforcement with no relief.

96. Defendant Barkley and President Swope furthered the scheme and taking of Plaintiff's rights by delaying production of bills by over 4 months until on about Nov. of 2016 through new

counsel only providing incomplete records while denying Plaintiff from properly realing equity and sale rights in his properties and denying Plaintiff rights to gain rental incomes from his properties.

97. Defendants Barkley Master and President Swope and by and through agents and employees have furthered the scheme by refusing and failing to provide proper records to back up payments and fees to Defendant Levine Law Group while continuing the wrongful taking of Plaintiff's interests and rights in the Units under foreclosure in Palm Beach County State Court proceedings.

98. Plaintiff again immediately sought voluntary resolution with Defendants at Barkley Master to avoid litigation and attorneys fees.

99. Defendants Barkley Master and President Swope have furthered the scheme by employing agents and counsel to delay production of complete and proper billing records from on or about September of 2016 to the present.

100. Specific records withheld are documentations of fees by the Levine Group relating to false and fraudulent "summary judgement" motions filed in the Palm Beach County state court system known or which should have been known to be improper in furtherance of the scheme against Plaintiff.

101. Defendants have furthered the scheme by filing false evidence and records in the Palm Beach County state actions.

102. Plaintiff has diligently made multiple written requests for records and documentation and attempts to resolve the billings and also in person attempts through Barkley Master managers, agents and President Swope.

103. This scheme has further included denying Plaintiff access to proper records to support the billings used as wrongful liens against Plaintiff's property interests in the Units herein from June of 2015 to the present.

104. On or around December of 2017, Plaintiff was wrongfully removed by Defendants Barkley Master's office when trying to make payments to resolve any bills and lien on the Units.

105. Plaintiff contacted the Palm Springs Police Department to report the incident.

106. On or around February 14, 2018, Plaintiff was wrongfully removed and denied freedoms of speech at a Public Meeting at Barkley Master to address and resolve the lien and billing matters.

107. Upon information and belief, these wrongs were further supported by the PBSO of Palm Beach county.

108. On or around March of 2018 Defendants Barkley Master wrongfully took Plaintiff's units by forcibly changing locks without ownership or permission of Plaintiff and without due process of law in courts.

109. During this time in March of 2018, state actor PBSO Officer John Doe falsely and wrongfully used the powers of government to further the Lien scheme against Plaintiff in favor of the Barkley Defendants.

110. During this same time, Defendant President Swope made statements about being a retired Police Officer who “knew the law” and threaten Plaintiff to further the takings of his property interests without due process.

111. Plaintiff Hoti has been repeatedly treated by medical doctors during all times relevant herein for stress, anxiety, fear of heart attack and other harm caused by Defendants.

AS AND FOR A FIRST CAUSE OF ACTION

112. Plaintiff repeats and re-alleges each and every fact contained in paragraphs 1 through 112 as if specifically repeated and restated herein.

113. For violations of fundamental rights under 42 USC 1983 and the due process clause of the US Constitution, Plaintiff seeks \$1 million in damages plus allowable costs and interest.

AS AND FOR A SECOND CAUSE OF ACTION

114. Plaintiff repeats and re-alleges each and every fact contained in paragraphs 1 through 114 as if specifically repeated and restated herein.

115. For violations of fundamental rights under 42 USC 1983 and the Equal Protection clause of the US Constitution, Plaintiff seeks \$1 million in damages plus allowable costs and interest.

AS AND FOR A THIRD CAUSE OF ACTION

116. Plaintiff repeats and re-alleges each and every fact contained in paragraphs 1 through 116 as if specifically repeated and restated herein.

117. For tortious conduct engaging in illegal billing and foreclosure scheme as against all

defendants, loss of Sale profits for each unit \$75,000 plus for Unit B; \$ 15,000 for Unit C; \$60,000.00 for Unit D. plus allowable costs and interest.

AS AND FOR A FOURTH CAUSE OF ACTION

118. Plaintiff repeats and re-alleges each and every fact contained in paragraphs 1 through 118 as if specifically repeated and restated herein.

119. For lost rents from the illegal conduct herein as against Defendant Barkley Master, \$1200 a month for 20 months for \$24,000 plus for Unit B; \$1200 a month for 20 months for \$24,000.00 plus for Unit C; \$1000 a month for 12 months of \$12,000 plus \$800 a month for 10 months in wrongfully collected rent from Wayne Money totalling \$8000 for \$20,000 total for Unit D, plus allowable costs and interest.

AS AND FOR A FIFTH CAUSE OF ACTION

120.00 Plaintiff repeats and re-alleges each and every fact contained in paragraphs 1 through 120 as if specifically repeated and restated herein.

121. For negligent infliction of emotional distress against all Defendants Plaintiff seeks an award of \$1 million dollars plus fees costs and interests as allowed by law.

PRAYER FOR RELIEF

WHEREFORE Plaintiffs demand Judgment against Defendants and prays this Court promptly

As follows:

1. First cause of action in the amount of \$ 1 million plus fees, costs and interests by law.
2. Second cause of action in the amount of \$1 million plus fees, costs and interests by law.
3. Third cause of action in the amount of \$150,000 total for 3 units in lost sale profits plus fees, costs and incidental damages.
4. Fourth cause of action in the amount of \$68,000 in lost rents total for 3 units plus fees costs and damages and incidental damages.
5. Fifth cause of action in the amount of \$1 million plus fees, costs and interests by law.

And for such other and further relief as may be just and proper.

Dated: _____

Skender Hoti,
Plaintiff, Pro Se
3103 Drew Way
Palm Springs, FL 33406
(561)385-6390