

February 14, 2013

Mr. Jeffrey T. Picker  
Assistant UPL Counsel  
The Florida Bar  
651 East Jefferson Street  
Tallahassee, FL 32399-2300

Re: RPPTL's Petition Dated March 28, 2012 Relating to Activities Which May or May Not Constitute the Unauthorized Practice of Law by Community Association Managers

Dear Mr. Picker:

This letter, which is submitted on behalf of the members of the organizations listed below, requests that the Standing Committee on the Unauthorized Practice of Law (UPL Committee) terminate any further review of the above referenced matter. In the alternative, this letter asks that the UPL Committee find that licensed Community Association Managers (CAMs) and community association management firms be permitted to perform the four below listed activities.

In addition, we are asking that you share this letter with all members of the UPL Committee before its February 22, 2013 meeting at which this matter will be addressed.

**I. HISTORY OF UPL MATTER AS IT RELATES TO COMMUNITY ASSOCIATION MANAGERS**

**July 12, 1996:**

In 1996, at the request of Jone B. Weist, a licensed Community Association Manager (CAM), the Florida Supreme Court issued a well reasoned and comprehensive opinion in which it decided which of twenty-one (21) community association activities addressed therein constituted the unlicensed practice of law (UPL). *(The Florida Bar re Advisory Opinion-Activities of Community Association Managers, 681 So.2d 1119 (Fla. 1996)).* More importantly, the Court established the following formula and standards which are to be used when addressing all other CAM activities, both then and in the future:

Although there is no comprehensive definition of what constitutes the unlicensed practice of law, we are guided in our analysis by our words from State ex rel. *Florida Bar v. Sperry*: It is generally understood that the performance of services in representing another before the courts is the practice of law. But the practice of law also includes the giving of legal advice and counsel to others as to their rights and obligations under the law and the preparation of legal instruments, including contracts, by which legal rights are obtained, secured or given away, although such matters may not then or ever be the subject of proceedings in a court.

**AND**

We agree that those actions designated by the Standing Committee as ministerial do not constitute the practice of law. CAMs can complete the two Secretary of State forms ..... because completion of those two forms **does not require significant legal expertise and interpretation**. Similarly, drafting certificates of assessment, first and second notices of date of election, ballot, written notice of annual meetings, annual meeting or board meeting agendas, and affidavits of mailing **do not require legal sophistication or training**. (Emphasis added.)

### **March 28, 2012:**

By letter dated March 28, 2012, the Real Property Probate & Trust Law Section (RPPTL) of The Florida Bar asked the Standing Committee on the Unauthorized Practice of Law to again review the same questions which have been addressed and answered by the Supreme Court in 1996. This request came as a complete surprise to most persons who are involved in community associations matters in that the Supreme Court had already supplied us with the standard and formula to determine whether CAMs were involved in UPL.

### **June 2012:**

The UPL Committee took testimony on the matters addressed in the March 28th letter.

### **September 2012:**

It is our understanding that, at its September, 2012 meeting, the UPL Committee rightfully declined to address most of the matters outlined in RPPTL's March 28th letter. It did, however, decide to further examine whether any of the following activities constituted UPL if performed by CAMs:

- Identifying, through use of title instruments, the owners to receive pre-lien letters;
- Drafting pre-arbitration demand letters;
- Modification of limited proxy forms promulgated by the state; and
- Preparation of documents concerning the right of the association to approve new prospective homeowners.

## **II. OUR PRIMARY POSITION:**

The beauty of the 1996 Supreme Court decision is that it not only addressed the twenty-one (21) specific activities which were brought before it for review, it also provided us and the Bar with the formula and standards to use in the future when faced with other activities which may not have been contemplated in 1996. For this reason, there is simply no legitimate reason for the UPL committee to again address this "asked and answered" question. As proof that there is no need for further review; please see the attached letter from Florida Department of Business and Professional Regulation (DBPR) confirming that there have been no complaints filed against a CAM concerning any alleged UPL. Consistent with that letter from DBPR, RPPTL has simply failed to supply any proof of any harm to the citizens of Florida.

Instead, if any person believes that a particular CAM has violated the Supreme Court's formula and standards, they can file individual complaints with DBPR and the Bar. It should be noted despite the many thousands of licensed community managers in Florida, there has not been a single complaint filed against a Florida Licensed Community Association Manager (CAM) regarding the unlicensed

practice of law (see exhibit a). In summary, the current exercise is a solution in search of a non-existing problem.

### III. THE FOUR REMAINING ACTIVITIES DO NOT CONSTITUTE UPL

While we steadfastly believe that no additional actions should be taken in this matter, the following is clarification as to why no further review is necessary as to the four remaining issues.

#### A. Identifying, Through Use of Title Instruments, the Owners to Receive Pre-Lien Letters

The Supreme Court of Florida has acknowledged the verification of ownership through title instruments by a non-lawyer is not the unlicensed practice of law. In re: *Advisory Opinion - Nonlawyer Preparation of Notice to Owner and Notice to Contractor*, 544 So. 2d 1013 (Fla. 1989), the Florida Supreme Court considered whether industry practices in completing and serving a Notice to Owner and Notice to Contractor prior to the filing of a construction lien constituted the unlicensed practice of law. Those practices included verification of ownership and property location through a computerized or physical “search of the public records in much the same way a title insurance company searches the records.” The Court concluded it was not. The Court further recognized those providing notice to owner services had knowledge of the construction industry and familiarity with the requirements for perfecting a mechanics lien that negated the likelihood of the public being harmed by preparation of the notice to owner forms. *Id.* at 1016. The practice of verifying ownership for a mechanics lien is analogous to that which would be performed as part of the pre-lien procedure performed by a CAM, community management company, or other 3<sup>rd</sup> party collections vendor. Further, community association managers have knowledge of the industry and familiarity with the statutory requirements for preparation and service of a pre-lien notice. Community association managers are licensed through the Department of Business and Professional Regulation’s Bureau of Condominiums and must pass an examination which “demonstrate[s] that the applicant has a fundamental knowledge of state and federal laws relating to the operation of all types of community associations. . . .” Fla. Stat. § 468.433. Further, all community association managers must complete 20 hours of continuing education every two years, four hours of which are devoted to legal issues. F.A.C. 61E14-4.001

Legal Services can be performed by attorneys either individually or through the umbrella of a professional service corporation established pursuant to Fla. Stat. §621.01 et seq. Other types of corporations may not practice law in any circumstances. See *Cooperman v. West Coast Title Company*, 75 So. 2d 818 (Fla. 1954) at 820. However, activities that may constitute the unlicensed practice of law in certain circumstances may not constitute the unlicensed practice of law in all circumstances. This is evident from the holding in *Cooperman*, supra, and that in *The Florida Bar v. McPhee*, 195 So.2d 552 (Fla. 1967). In *Cooperman*, the Florida Supreme Court concluded that agencies may take necessary steps to inform themselves of the condition of title through “examination of their own records, abstracts that may be furnished, and the public records accessible to all.” *Cooperman* at 820. The Court reasoned that a title agency may conduct these actions, because even though they are representatives of other corporations engaged in issuing title

insurance, they must make a decision whether or not to issue a policy of title insurance, and for that purpose they are representing themselves. The court noted that the title agencies were not paid for the activities performed, but a part of the premium for issuance of the title policy and that their incentive for accomplishing an acceptable title transfer is to earn that premium. Similarly, a CAM or management company that determines ownership through the review of title instruments is not compensated for the service of reviewing title. They are compensated for being the association's manager. The fact they verify ownership to ensure the pre-lien letter is drafted to the appropriate party is in effect no different than a title agency reviewing title instruments in order to ascertain the condition of title prior to issuance of a title policy. In either case the title is being reviewed to ensure that the reviewers work product is satisfactory. The *Cooperman* decision was again reviewed by the Florida Supreme Court in *The Florida Bar v. McPhee*, supra, and upheld.

Community associations are typically not-for-profit corporations. As such, they can only act through their employees and agents. Most associations are headed by a volunteer board of directors who employ a CAM or management company to oversee the association's day-to-day operations. These operations include the collection of assessments which are generally the only source of the association's income. The CAM or management company acts on behalf of the association as its agent, pursuant to a written contract. Courts have found that this is a fiduciary relationship and the actions of a CAM or management company in pursuing the collections of its principal are incidental to that relationship. See *Harris v. Liberty Community Management, Inc.*, -- F.3d --, 2012 WL 6604518 (11th Cir. 2012) (11th Circuit held a management company did not violate the Fair Debt Collection Practices Act (FDCPA) because its attempts to collect the debt incurred for unpaid association fees was "incidental" to its obligation to the association.); *Reynolds v. Gables Residential Services, Inc.*, 428 F. Supp 2d 1260 (2006)(Gables collection activities were incidental to a bona fide fiduciary relationship and it had an obligation to collect the monthly rent, thus it was not a debt collector within the meaning of the FDCPA).

In summary, the review of title instruments by a non-lawyer, to determine the owner to whom a pre-lien letter should be sent, does not constitute the unlicensed practice of law. However, assuming *arguendo* that it is the practice of law, it should not be prohibited in the case of a CAM or community management firm. These activities are incidental to the management services being provided; are not being compensated for directly; and are being provided by one with a special knowledge of the industry and familiarity with the statutory requirements for preparation and service of a pre-lien notice. In such circumstances, the likelihood of harm to the public is extremely low if not non-existent.

## **B. Drafting of Pre-Arbitration Demand Letters**

The second proposed area of review by the Committee is the drafting of pre-arbitration demand letters under Section 718.1255 of the Florida Statute. It is the RPPTL's position that such letters are the practice of law and is work that can only be done by a licensed attorney. In support of its position, the RPPTL references existing case law and presents 12 cases of alleged consumer harm caused by community manager prepared pre-arbitration demand letters. However, the case law

cited, the unqualified nature of the cases alleging consumer harm and the plain language of the statute do not support the section's position.

First, the RPPTL concedes that under current precedent in the cited case *Dania Chateau De Ville Condo Association v Zaclberg*, that the preparation of pre-arbitration demand letters does not require the assistance of counsel. In fact the court found that there was no statutory requirement that an attorney prepare the letter. Thus, current legal precedent interpreting the statute does not support the RPPTL's petition. Further, if the court found that lack of statutory language allowed this work to be performed by non-attorneys, then it would likely follow that any changes to this requirement should also be undertaken through the legislature and not through the Bar.

In support of its petition to the Committee, the RPPTL provides citations to at least 12 cases of alleged consumer harm and notes the existence of 20 more such cases where non-attorney preparation of pre-arbitration demand letters resulted in alleged consumer harm. However, the RPPTL does not disclose that in the examples provided, at least four pre-arbitration demand letters were in fact, prepared by attorneys. In other cases, it is unclear by the case law who provided such letters. Even if the Bar were to assume that the 12 cases cited by the section were legitimate, justification for restricting consumer choice should not be based on incidental evidence but rather on qualified data. Thus, the 12 cited cases should be viewed in the context of the total number of such letters sent out each year. This allows the Bar, the courts, and the public to understand if the rationale for the Committee's recommendation is based on widespread problems as opposed to incidental occurrences. Under this standard the RPPTL failed to provide adequate data to analyze its concerns.

Finally, the very statutory language creating the alternative dispute resolution (ADR) process does not support the RPPTL's position. Under Section 718.1255 of the Florida Statute, an association, its agent or a resident can petition for arbitration of disputes in their community association. The legislative intent of this program is made clear:

"The Legislature finds that unit owners are frequently at a disadvantage when litigating against an association. Specifically, a condominium association, with its statutory assessment authority, is often more able to bear the costs and expenses of litigation than the unit owner who must rely on his or her own financial resources to satisfy the costs of litigation against the association."<sup>1</sup>

The state has made it explicit that the purpose of the ADR program was to empower consumers to resolve disputes through a process that was not bogged down by the chilling effects of attorney fees, court costs, and other expenses. Thus, by granting the RPPTL's petition, the Bar is using its self-regulatory authority to sidestep the legislative will of Florida residents who sought to establish a dispute resolution system that did not impose the high hurdle of legal fees. Requiring such pre-arbitration letters to be drafted by an attorney runs counter to the plain language of the law and would hurt consumers. For these reasons, the bar should not move forward with the classification of pre-arbitration demand letters as UPL.

### **C. Modification of Limited Proxy Forms Promulgated by the State**

The request for an advisory opinion dated March 28, 2012, submitted by the Real Property, Probate and Trust Law Section states no basis as to why an advisory opinion is necessary on this issue. The issue was properly addressed in the 1996 opinion of the Florida Supreme Court in its finding that a licensed community association manager may complete or modify a limited proxy form without violating the prohibition against the unauthorized (i.e. unlicensed) practice of law to the extent that such work involves ministerial matters contemplated by the statutory description of community association management; however, an attorney must be consulted as to more complicated drafting or modifications. The specific facts will dictate if a particular modification requires the assistance of counsel. There has been no showing of consumer harm which would justify expansion or modification of the 1996 Advisory Opinion.

### **D. Preparation of Documents Concerning the Right of the Association to Approve New Prospective Homeowners**

The Florida Supreme Court determined the drafting of documents required to exercise a community association's right of approval or first refusal to a sale or lease may also require the assistance of an attorney, since there could be legal consequences to the decision. Although community association managers may be able to draft the documents, they cannot advise the association as to the legal consequences of taking a certain course of action. Absent a showing by the Section that the circumstances related to these actions have changed since the ruling, the Committee should not make substantive changes to the current status of this activity.

## **IV. CONCLUSION**

Again, we urge you to take the substantive information submitted to you over the past 9 months from people living and working in Florida community associations every day and allow the current system and opinions to continue to define the framework for unlicensed practice of law in community associations.

Thank you for your consideration of our position on these issues. If you have any questions regarding this letter or any of the organizations represented in the letter, please do not hesitate to contact us. We appreciate the critical nature of these issues, and look forward to the courtesy of your reply.

Sincerely,

# **SUPPORTING ORGANIZATIONS AND COMPANIES**

## **INDUSTRY ORGANIZATIONS**

Community Associations Institute (CAI); representing eight chapters throughout Florida and the CAI Florida Legislative Alliance  
Chief Executive Officers of Management Companies (CEO-MC)  
Council of Neighborhood Associations (C.O.N.A.)

## **LAW FIRMS**

Association Law Firm  
PeytonBolin, PL  
Pursiano Barry Lavelle Bruce Hassin, LLP  
Robert L. Tankel, P.A.  
South Milhausen PA  
Taylor & Carls, P.A.  
Terra Law Firm, P.A.  
Weston & Gregory PA

## **INDUSTRY BUSINESS PARTNERS**

Association Financial Services, LC

## **MANAGEMENT COMPANIES**

All Seasons Vacation Resort  
AMI-Advanced Management, Inc  
Associa Gulf Coast, AAMC  
Association Services of Florida, AAMC  
C&S Condominium Management Services, Inc., AAMC  
Capital Consultants Management Corporation (CCMC), AAMC  
CMC – Jacksonville, AAMC  
CMC Clearwater, AAMC  
Community Management Concepts  
Community Management Professionals, Inc., AAMC  
Condominium Associates  
Continental Group, Inc.  
Creative Management  
Elite Property Management Services, Inc., AAMC  
Emerald Coast Association Management Inc., AAMC  
Golden Sands Community Management  
Home Encounter, LLC  
House of Management Enterprises  
Management & Associates  
Management Concepts, Inc.  
Marsh Landing Management Company  
MEB Real Estate Management, Inc.  
Omni Management Services  
Procam LLC, AAMC  
Rampart Properties, AAMC  
Resource Property Management, Inc., AAMC  
Rizzetta & Company, Inc.

Robinson Management & Consulting, Inc.  
Leland Management  
Sea Breeze Assoc. Mgmt. Co. AAMC  
Sentry Management, AAMC  
Sutherland Management, Inc  
Terra Management Services, Inc.  
The Association Office, Inc.  
The Property Group of Central Florida  
The Vanguard Management Group, Inc., AAMC  
Towers Property Management

\*The AAMC accreditation demonstrates a company's commitment to providing the unique and diverse services community associations need. An Accredited Association Management Company complies with high standards of service in community association management services and ensures that their staff have the skills, experience, and integrity to help communities succeed. Its managers have advanced training and demonstrated commitment to the industry.

## **LEGISLATORS**

Representative Mike Fasano

## **COMMUNITY ASSOCIATIONS**

6000 Park Place  
Academy Park Villas  
Academy Resort Lodge  
Alcove Mobile Homes  
All Seasons Vacation Resort  
Aloha Towers  
Anchor Cove 1  
Anchor Cove Master  
Antigua  
Arbor Heights  
Arts Center Loft  
Ashbury Park Villas  
Ashington Neighbor.  
Audubon Villas Bel Mare  
Avalon  
Bahia Del Mar #4 P Building  
Bahia Del Mar 1  
Bahia Del Mar 7  
Bahia Del Mar Ii  
Bahia Homeowners  
Bahia Vista 2  
Bahia Vista 3  
Bahia Vista 5  
Bahia Vista Iv  
Basset Creek Estates Homeowners Association, Inc.  
Bay Aristocrat Village Mhp  
Bay East 1  
Bay East 2  
Bay East 3  
Bay East 6  
Bay East 7

RPPTL's Petition Dated March 28, 2012 Relating to Activities Which May or May Not Constitute the Unauthorized Practice of Law by Community Association Managers

Bay East 8  
Bay East Commons  
Bay Estates  
Baygreen Villas  
Bayshore 1  
Bayshore 2  
Bayshore On The Lakes 3  
Bayshore On The Lakes 3  
Bayshore On The Lakes 3 Commons  
Bayshore Royal  
Bayside Condos  
Bayside North  
Bayview Condominium Association  
Baywood Meadows Condominium Association  
Beach Cottages  
Beachwalker  
Beckett Way Townhomes  
Bel-Aire Mobile Home  
Bel-Aire Mobile Home  
Bella Playa  
Bellagio  
Bellamy On Bayshore  
Belle Harbor  
Belleair Forest Condo  
Belleair Oaks  
Belleair Village  
Bellevue Island Hoa  
Bellevue Biltmore Homes  
Bermuda  
Bermuda Bay  
Boca Pointe Community Association, Inc.  
Boca Sands  
Boca West Master Association  
Bolletieri Resort Villas  
Bonnie Bay  
Boot Ranch North Homeowner's Association  
Bordeaux 3  
Boulevard Club  
Box Factory  
Brandy Chase Condominiums Inc.  
Brandy Chase Condominiums  
Bridgeford Oaks Homeowners Association  
Brightwaters Tower  
Brookfield Hoa  
Brownstones Soho  
Café Pepe  
Cambridge At Hunter's Run Condominium Association Inc.  
Cambridge I At Hunter's Run Condominium Association Inc.  
Capri Harbor South  
Capri Harbor South - Docks  
Captiva Cay  
Caribay

Carrollwood Gables  
Carrollwood Village Chase  
Casa Del Mar #3 E & F Buildings  
Casa Del Mar 2  
Casa Del Mar 5  
Cassine Garden Townhome Owners Association, Inc  
Cavalier  
Celebration Town Hall  
Channelside One  
Chateau Bayonne Condominium Association  
Chateau Belleair  
Chateaux De Bardmoor Commons  
Chateaux De Bardmoor Unit 1  
Chateaux De Bardmoor Unit 10  
Chateaux De Bardmoor Unit 2  
Chateaux De Bardmoor Unit 3  
Chateaux De Bardmoor Unit 7  
Chateaux De Bardmoor Unit 8  
Chateaux De Bardmoor Unit 9  
Cinnamon Lake Four  
Cinnamon Lake Master  
Cinnamon Lake One  
Cinnamon Lake Two  
Clearview Oaks Condominiums  
Clearview Oaks Paradise Association  
Clearwater Cascade  
Clearwater Pt Swim  
Cloisters At Bardmoor  
Clrwtr Pt 8  
Club Bahia Vista  
Clwtr Pt 4  
Cobb's Landing - Estates  
Cobb's Landing - Pinnacle  
Cobb's Landing Comm/Assoc  
Collwood  
Colony Lakes Homeowners Association Of Pasco County, Inc.  
Colony Oaks Hoa  
Colony, The (Co-Op)  
Compass Pointe Townhomes Association, Inc.  
Coral Pointe  
Cordova Greens 3  
Cottage Retreat Of Miramar Beach Homeowner's Association  
Country Park Co-Op  
Crimson Harbour Marina  
Cross Creek At East Lake Woodlands  
Crystal Shores Owners Association  
Crystal Shores Owner's Association  
Cottage Retreat Homeowner's Association  
Destiny Beach Villas Owner's Association  
Curacao  
Curlew Mobile Homes  
Cutter Cove

Deerpath 1 Hoa  
Deleon Homeowners Association, Inc.  
Disston Plaza  
Dolphin Cay  
Dominica  
Driftwood Sands  
Eagle Ridge Homeowner's Association  
Eagles Crossing  
Eagles Glen Condos  
Eagles Walk  
East Lake Woodlands Cluster Ii  
East Lake Woodlands Cluster Iii  
Eastern Shores Condominium Owners Association, Inc  
Eastgate At Hunter's Run Condominium Association Inc.  
Eastgate I At Hunter's Run Condominium Association Inc.  
Easton Park  
Eastwood Shores 3  
Edgewater Arms First  
Edgewater Arms Fourth  
Edgewater Arms Master  
Edgewater Arms Second  
Edgewater Arms Third  
Edgewater Homeowners Association  
Egret Cove Hoa  
Emerald Pointe Homeowner's Association  
Enclave Of Pasco  
Essex At Hunter's Run Condominium Association Inc.  
Estancia Condo  
Estates At Hunter's Run Condominium Association Inc.  
Ewing Place  
Fairway Asso. (Villages) Saddlebrook  
Fairway Lakes  
Feather Cove  
Feather Pointe I Condominium Assoc., Inc.  
Forest Park Community  
Forest Park Condo 1  
Fountain Square  
Fox Pointe Homeowners Association, Inc. (Palm Aire)  
Foxwood At Trinity  
French Quarter  
Gardens 102  
Gardens 103  
Gardens 104  
Gardens 105  
Gardens Of Beacon Square 4c  
Gardens Of Beacon Square Four  
Gardens Of Beacon Square Four A  
Gardens Of Beacon Square Four B  
Garrison  
Gates Creek Homeowners Association, Inc.  
Gateway By The Bay  
Gemini Condominium Association, Inc

Glendale Villas  
Glens East At Hunter's Run Condominium Association Inc.  
Glens West At Hunter's Run Condominium Association Inc.  
Golfside Estates Hoa  
Grand Bellagio  
Grandview Docks  
Green Valley Estates  
Greenfield Midrises  
Grey Oaks Homeowners Association  
Gulf Landings Hoa  
Gulf Shores  
Gulf Strand  
Hamilton Place Condominium Association, Inc.  
Hammock Pines 2  
Hammock Pines 4  
Hammock Pines Mst  
Hampshire At Hunter's Run Condominium Association Inc.  
Harbor Bluffs  
Harbor Oaks  
Harbor Villas Condominium Association  
Harborage Condos  
Harborage Docks  
Harborview Grande  
Harbour Club 2  
Harbour Homes  
Harbour Lt Towers  
Harbour Towne  
Harbour, The  
Harbourside/Sailboat  
Harshaw  
Heather Lakes C  
Heather Lakes D  
Heather Lakes E  
Heather Lakes F  
Heather Lakes G  
Heather Lakes H  
Heather Lakes I  
Heather Lakes J  
Heather Lakes K  
Heather Lakes L  
Heather Lakes M  
Heather Lakes Mstr  
Heather Lakes N  
Hemingway Estates Homeowners Association, Inc.  
Heritage Oaks Townhomes Association, Inc.  
Hicsa  
Highlands At Hunters Green  
Holiday Villas Ii  
Hunters Glen  
Hunter's Trail  
Huntington By The Campus Homeowner's Association  
Hyde Park Tower

Hyde Park Village, Old  
Hyde Park Walk  
Ibis Property Owners Association  
Idle Forest Homeowners Association, Inc  
Imperial Oaks  
Imperial Point # 6  
Imperial Point Poa  
Indian Springs  
Innisbrook Condominium Association, Inc.  
Isla Key  
Island Chateau  
Island Club  
Island Homes  
Island Towers East  
Island Towers Master  
Island Towers West  
Kalmia #1  
Kalmia #2  
Kalmia #3  
Kalmia #4  
Kalmia #5  
Kalmia #7  
Kalmias Rec  
K-Bar Ranch Master Association, Inc.  
Kensington Oaks  
Key Capri  
Key Vista Villas  
Keys  
Kipps Colony 1  
Kipps Colony 2  
La Puerta Del Sol  
Ladera  
Lake Forest  
Lake Forest  
Lake Heather Heights Condominium Association  
Lake Placid Park  
Lake Talia  
Lakeside Crossing  
Lakeview Of Largo  
Lakeview Of Largo 1  
Lakeview Of Largo 2  
Lakewood Retreat  
Lancaster  
Las Brisas Of Madeira  
L'ermitage A Palm Beach Condominium Association Inc.  
Letting Well  
Lindentree  
Linkside I Condominium Association  
Loblolly  
Loch Lomond Estates  
Long Leaf  
Los Prados

Madeira Bay Resort Ii  
Madeira Bay Townhomes  
Mandalay Beach Club  
Mangrove Cay I  
Mangrove Cay Master  
Manhattan  
Manor, The  
Mansions By The Sea  
Marina Bay  
Marina Del Rey  
Mayfair  
Mayfair  
Meadowglen Hoa  
Meridian  
Middle Creek  
Millbrook Ranch  
Mirror Lake  
Mission Oaks  
Nature's Hideaway Phase Ia Homeowners Association  
Nature's Ridge  
Nature's Ridge  
New Atlantis  
New Floresta  
North Neighborhood  
Northwoods At Hunter's Run Condominium Association Inc.  
Northwoods I At Hunter's Run Condominium Association Inc.  
Oakleaf Cluster  
Oaks At Hunter's Run Condominium Association Inc.  
Oaks Of Seminole  
Oasis Singer Island Condominium  
Old Clearwater City Flats  
Orion  
Osprey Pointe  
Palm Island Hoa  
Palma 5  
Palma Del Mar #2 Coa C & D Building  
Palma Del Mar #4 Coa G Building  
Palmbrooke Townhomes  
Palms Of Tierra  
Palms Of Tierra Dock  
Paradise One  
Paradise Three  
Paradise Townhomes  
Paradise Two  
Park Place Townhomes  
Parke East  
Parkway Palms Community Services Property Assn., Inc.  
Parkway Palms Resort Maingate Condo., Assn., Inc.  
Pasadena Cove  
Pasadena Marina  
Pasadena Place  
Pasadena Yacht CC

Patrician Oaks 1  
Patrician Oaks 10  
Patrician Oaks 11  
Patrician Oaks 2  
Patrician Oaks 3  
Patrician Oaks 4  
Patrician Oaks 5  
Patrician Oaks 6  
Patrician Oaks 7  
Patrician Oaks 8  
Patrician Oaks 9  
Patrician Oaks Clubhouse  
Patriot Square 1  
Patriot Square 2  
Pebble Creek Villas Association, Inc.  
Pelican Bay Bldg A  
Pelican Bay Bldg. B  
Pelican Bay Master  
Pelican Isle  
Pelican Landing Community Association, Inc.  
Phase 4 Of Destiny East Owners Association  
Philippe Bay  
Piazza  
Pinehurst  
Pinewinds Homeowner's Association  
Pinewood Village  
Plantation Management Association, Inc.  
Plantation Palms  
Plantation Woods Homeowners Association, Inc.  
Pointe  
Port Belleair 3  
Port Royal  
Preserve At Fairway Oaks Homeowner's Association  
Promenade  
Promenade Townhomes Owners Association, Inc.  
Quintessa Homeowners Association, Inc.  
Ranchero Village Co-Op  
Redington Place  
Regatta Beach Club  
Remmington  
River Ridge Country Club Hoa  
Rosemary Beach Property Owners Association, Rosemary Beach, Fl  
Rothmoor Estates  
Royal Orleans  
S.H. Condominium Assoc., Inc.  
Sabal Industrial Park  
Sable Ridge Homeowner's Association  
Sailboat Key Master Association  
Sand Cliffs Owners Association, Inc.  
Sandy Key Owners Association, Inc.  
Santa Fe At Stagecoach  
Savoy Estates

Seaside Estates  
Seaside I  
Seaside II  
Seaside Mstr  
Seaview Place  
Shipwatch 10  
Shipwatch 3  
Shipwatch 4  
Shipwatch 5  
Shipwatch 7  
Shipwatch 8  
Shipwatch 9  
Shipwatch Master  
Shipwatch One  
Shipwatch Tennis  
Shipwatch Two  
Skimmer Point  
Sky Harbor  
Snug Harbour  
South Bay  
South Beach 1  
South Garden 6  
South Garden 8  
South Neighborhood  
Southport At Hunter's Run Condominium Association Inc.  
Spinnaker Cove Coa  
Spinnaker Cove Coa "A"  
Spinnaker Cove Coa "A-1"  
Spinnaker Cove Coa "B"  
Spinnaker Cove Coa "C"  
St Tropez  
Stagecoach  
Starlight Tower (Co-Op)  
Stonelake Ranch  
Stovall  
Stratford At Hunter's Run Condominium Association Inc.  
Stratford Commons  
Summer Lakes Homeowner's Association  
Summergate  
Sun Harbor  
Suncoast Meadows  
Sunset Reef  
Sunset Towers Condominium Association, Inc.  
Sunset Village  
Sunset Watch  
Sunwatch On Island Estates  
Sutton Place At Hunter's Run Homeowners Association Inc.  
Tall Pines (Master)  
Tampa Palms North  
Tanglewood Environmental Preserve Association  
Tara Master  
Terrace Park-28

Terrace River Landings Homeowners Association  
Cypress Estates Homeowners Association  
Grand Oaks Homeowners Association  
Buckingham Homeowners Association  
Whitlock Homeowners Association  
Lumsden Pointe Homeowners Association  
The Condominium Association Of Waterside Ii  
Bristol At Hunter's Run Condominium Association Inc.  
The Club At Feather Sound  
The Dunes On The Beach  
The Estates Of Beacon Woods East Homeowner's Association  
The Friendly Native Bch  
The Grand Reserve  
The Isles At Hunter's Run Homeowners Association Inc.  
The Lakes At Sable Ridge Homeowner's Association  
The Links  
The Nautilus Community Association  
The Oaks Owners Association, Inc.  
The Oaks Vi  
The Palms Of Tarpon  
The Pinnacle Homeowner's Association  
The Preserve At Cypress Lakes Homeowner's Association  
The Residences At Sandpearl Resort Owners' Association, Inc.  
The Townhomes Of Carrollwood Village Condo Assoc. Dba Fairway Lakes  
Three Palms Pt  
Thurston Groves Hoa  
Timbercreek Condominium Association, Inc.  
Timberwoods  
Towers Of Channelside  
Town Center Association  
Townhomes Of Carrollwood Village Condominium Assoc., Inc.  
Townhomes Of Park Place  
Tradewinds East  
Traditions  
Treasure Island Villas  
Trinity West Homeowner's Association  
Tudor Cay  
University Oakwoods  
University Oakwoods Association, Inc.  
Utopia  
Venetia Country Club  
Venezia  
Ventura Country Club Community Association Inc.  
Venture Out At Panama City Beach, Inc  
Vermillion At Meadowpoint  
Vieux Carre Condominium Association  
Villa Del Mar Coa  
Villa Madiera  
Village At Tierra Verde  
Village Paradise One  
Village Paradise Three  
Village Paradise Townhome

Village Paradise Two  
Village Woods Condominium Association  
Villaggio  
Villas Capri  
Villas De Golf  
Villas Del Verde  
Villas Of Brentwood At Hunter's Run Condominium Association Inc.  
Villas Of Deerfield  
Villas Of Deerfield  
Villas Of Hampshire At Hunter's Run Condominium Association Inc.  
Villas Of Northwoods At Hunter's Run Condominium Association Inc.  
Villas On The Green Homeowners Association  
Vineyard  
Vista Shores  
Vista Verde East  
Vista Verde North  
Vista Verde West  
Walker Whitney Plaza  
Water's Edge  
Water's Edge  
Wedgewood Condominium Association  
West Bay Village  
West Meadows Property Owners Association, Inc.  
West Shore Village  
Westgate At Hunter's Run Condominium Association Inc.  
Westlake Village Civic  
Westwood Lakes Hoa  
Whisper Woods  
Whispering Waters  
Whitehall  
Wilderness Lakes Preserve Master  
Willow Point  
Willowbrook  
Windfair Prof Center  
Winding Creek 1  
Winding Creek 2  
Winding Creek 3  
Winding Creek 4  
Winding Creek 5  
Winding Creek 6  
Winding Creek 7  
Winding Creek Master  
Winding Wood X  
Windsor At Hunter's Run Condominium Association Inc.  
Windsor Pl @ River Ridge  
Windward Pointe  
Winthrop New Townhome  
Winthrop Townhomes  
Wood Lake Condo  
Woodland Estates Homeowner's Association  
Woodland Green Condominium Association (Palm Aire)  
Woods At Hunter's Run Condominium Association Inc.

Woodtrail Condominium Association  
Worthington Homeowner's Association  
Wyndtree