

February 18, 2020

Worthland Construction, LLC  
1486 Skees Rd., Suite D  
West Palm Beach, FL 33411

Re: Construction Defects  
11267 Pond View Dr., B-204

Shawn & Matt Couch;

You have fraudulently filed a lien on the above property and we demand that you cease and desist and release the lien. Your requisitions, as submitted, have all been paid in full. We found out today that on 12/11/2019 a "Notes to File" was issued by Matt Couch taking back a credit of \$8,000 granted, invoiced and paid for. This action and bill adjustment was never disclosed to us. It was never brought up during the project close out and punch list process, it was never noted on any of your bills or requisitions and you have made no attempt to collect this money directly with us.

This is either an honest mistake or a sneaky attempt to extort extra money from us. Your company and its principles will be held liable for any damages caused by your actions to my reputation in the community.

We had brought to your attention construction deficiencies which we agreed to overlook to close out the project timely. Based on your actions, we now want these items corrected or a credit issued for all punch list items. We also want answers, additional proof and clarification on billing questions that were previously requested via email. Specifically -

- Need proof that the supervision was on our project and not another project you had in the Polo Club. Total supervision increased more than \$9,000 in a few weeks and there was no reason to have two people standing around the job site. The total supervision for a project of this size and detail is excessive. Excerpts of time sheets as provided are not acceptable proof, we need all time records for the people being billed to us
- We need to see all bills and proposals from Wall Design. We were billed for drywall work performed by other contractors.
- As a cost plus contract, we need to see all canceled checks supporting each line item billed. This will prove that you paid the subcontractors the amount we were billed for and that no discounts were given to you as a GC.
- Refrigerator cabinet and related wall panels were improperly installed. It needs to be removed, pulled out and the related side panel replaced and repainted.

- The counter top installed has two cracks, one was patched without our knowledge or approval. This is not acceptable and the counter needs to be completely replaced as the workmanship is not acceptable.
- The backsplash was not properly installed. The material used has an "A" and "B" panel whereby the veins line up from the deck up continuing up the wall. This installation does not line up and needs to be replaced. Remember. We paid for the counter top and backsplash material.
- The high hat lights installed in the hall to the kitchen were not installed in a straight line - they need to be aligned so the optics work.
- HVAC duct work was clogged with sheetrock dust and construction debris and needed to be cleaned and was not. We did the work as it was a health issue.

We will be getting prices on all of this work and will escrow the \$8,000 with our attorney until the work is complete or a credit / refund is issued. Just received another call from Nelson, Cruz & Associates who tells me that this is not an honest mistake.

Respectfully,  
11267 Pond View LLC

A handwritten signature in black ink, appearing to read 'Tony Branca', with a long horizontal line extending to the right.

Tony Branca,  
Managing member