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December 15, 2025

Via Regular Mail and Email

Jacaranda Country Club Homeowners' Association, Inc.

Hank Van Baalen, President

Email: dirhvb@jacarandacchoa.org

c/o

Raymond Cahill, CPA

4801 S. University Dr.

Suite 200

Davie, Florida 33328

Re: BERGMAN'S / JACARANDA'S DEFAMATION PER SE AGAINST ME AND MY FIRM

Dear Board:

This is a follow up (and my last letter) to my prior communications regarding my and my firm's claims for defamation per se against Renata Bergman and the Association. I am in receipt of copies of various communications written by Renata Bergman in which she clearly identifies herself as a Board of Director of Jacaranda Country Club Homeowners' Association, Inc. (the "Association") in which she made defamatory remarks against me and my firm both individually and against my professional performance. She caused these statements to be posted on Florida's Department of State, Division of Corporation's website, otherwise known as Sunbiz. She posted the defamatory statements under oath! She also posted them under Jacaranda Country Club Homeowners' Association, Inc. (the "Association"). Her communications constitute publication to third parties.

Additionally, as she is a member of the Board of Directors for the Association, her communications not only will result in me naming her as a defendant in the defamation lawsuit, but also the Association. I have sent a corresponding letter to her directly. I hereby demand she and the Association cease and desist from all libel and slander against me and my law firm; I demand a copy of the Association's insurance policies that may cover these tortious acts.

Her communications falsely accuse me of breaching my fiduciary duty to Jacaranda, participating in a conspiracy, and failing to fulfill obligations to the Association. As such statements attack my reputation and services as the Association's Counsel, under Florida law her statements constitute defamation per se. Thus, damages to me and my business reputation are presumed. Of course, she states within her "Statement of Facts" that she recognizes the impact of her defamatory statements and that the statements will live in infamy as records on Sunbiz cannot be deleted.

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She herself stated:

“I understand that this affidavit will serve as official confirmation of the false filing rendered by Mr. Cahill on January 27, 2025, to correct SunBiz' permanent records, will be posted online on the SunBiz website along with the Association's other/historical filings, and can be provided to relevant financial institutions, regulatory bodies, or any other parties that may require verification of the stated facts.”

As her statements were false, she knew they were false when she published them to third parties, and she knew they would cause damage, I am filing suit against her personally and the Association. Especially in light of the fact that she made this permanent post *after* my previous warning and demand to her personally and to the Association. The Association has until December 31, 2025 to amicably resolve this dispute, I will file suit on January 2, 2026 if not resolved.

PLEASE ADVISE YOUR CLIENT TO GOVERN ITSELF ACCORDINGLY.

Very Truly Yours,

Edward F. Holodak

Edward F. Holodak, Esq.,
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CC: Carrier

EFH: pl

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