



VALANCY HOLODAK & REED

*A Partnership of P.A.s*

Central Fort Lauderdale Office  
310 SE 13<sup>th</sup> Street  
Ft. Lauderdale, FL 33316

West Coast Office  
42881 Lake Babcock Dr., Ste 200  
Punta Gorda, FL 33982

East Fort Lauderdale Office  
3326 NE 33<sup>rd</sup> Street  
Ft. Lauderdale, FL 33308

December 15, 2025

*Via Regular Mail and email*

Jacaranda Country Club Homeowners' Association, Inc.  
Hank Van Baalen, President  
Email: [dirhvb@jacarandacchoa.org](mailto: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 RAYMOND CAHILL, CPA

Dear Board:

I write as a follow up to conversations directly between my client and the Board. 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 Raymond Cahill, CPA ("My Client") both individually and against his 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 place her as a defendant in the defamation lawsuit, but also the Association in the same position. 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 My Client; I demand a copy of the Association's insurance policies that may cover these tortious acts.

Her communications falsely accuse My Client of breaching his fiduciary duty to Jacaranda, participating in a conspiracy, and failing to fulfill obligations to his client (the Association). As such statements attack My Client's reputation and services as the Association's CPA, under Florida her statements constitute defamation per se. Thus, damages to My Client and his business reputation are

Steven S. Valancy, Esq.  
[steven@myflalaw.com](mailto:steven@myflalaw.com)  
(954) 463-1600

C. Mark Reed, Esq.  
[c.mark@myflalaw.com](mailto:c.mark@myflalaw.com)  
(954) 463-1600

Edward F. Holodak, Esq.  
[edward@holodakpa.com](mailto:edward@holodakpa.com)  
(954) 927-3436  
*Florida Bar Board Certified in  
Condominium and Planned  
Development Law; AV Rated Preeminent*

Lawrence E. Blacke, Esq.  
[lb@lblacke.com](mailto:lb@lblacke.com)  
(954) 566-5070  
*Of Counsel to All*

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.

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 My Client damage, My Client authorized me to file suit against her personally and the Association. As I am already in possession of the Association's insurance information, I am sending a copy of this letter directly to the adjuster who communicated with me regarding my personal claims against Ms. Bergman and the Association.

Jacaranda has until December 31, 2025 to amicably settle this issue; otherwise, on January 2, 2025, I will be filing a lawsuit against Ms. Bergman and the Association accordingly.

**PLEASE ADVISE YOUR CLIENT TO GOVERN ITSELF ACCORDINGLY.**

Very Truly Yours,

*Edward F. Holodak*

Edward F. Holodak, Esq.,  
Valancy Holodak & Reed  
A Partnership of P.A.s

CC: Client

EFH:pl

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Steven S. Valancy, Esq.  
[steven@myflalaw.com](mailto:steven@myflalaw.com)  
(954) 463-1600

C. Mark Reed, Esq.  
[c.mark@myflalaw.com](mailto:c.mark@myflalaw.com)  
(954) 463-1600

Edward F. Holodak, Esq.  
[edward@holodakpa.com](mailto:edward@holodakpa.com)  
(954) 927-3436  
*Florida Bar Board Certified in  
Condominium and Planned  
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Lawrence E. Blacke, Esq.  
[lb@lblacke.com](mailto:lb@lblacke.com)  
(954) 566-5070  
*Of Counsel to All*