



ROSENBERG, CUMMINGS
& EDWARDS PLLC

June 9, 2017

Via E-Mail and Filing:

Office of the City Manager
Lori Mertens-Black
2600 Hollywood Blvd
PO Box 229045
Hollywood, FL 33022

Re: Appeal of Revocation of Vacation Rental License for 929 N Southlake LLC

Dear Ms. Mertens-Black

Rosenberg, Cummings, & Edwards PLLC (the "Firm") serves as general counsel for Ero Rentals LLC concerning all litigation and real estate matters. Please allow this letter to serve as my client's appeal of the revocation of his Vacation Rental License pursuant to The City of Hollywood Code Ordinance 119.56.

My client's vacation rental license was allegedly revoked pursuant to City Vacation Rental Regulation, Ch. 119.58 (D)(1) which sets forth the following:

(D) *Revocation of License.*

(1) The City Manager may refuse to issue or renew a license or may revoke a vacation rental license issued under this chapter, if the property owner has willfully withheld or falsified any information required for a vacation rental license.

Your interpretation of 119.58 (D)(1) as it relates to my client's action is unfounded and misapplies the city ordinance. I have attached a copy of my client's vacation rental application, which specifically states as follows:

Property Information

Street Address: 929 N. Southlake Drive. Number of Bedrooms: 5

Number of o-site Parking Spaces: 5 Zoning District:

Will the vacation rental have 10 or fewer occupants: Yes ___ No X



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When my client filled out the Vacation Rental Application, he checked the box that stated that he would have more than 10 occupants on the property. The revocation of my client's vacation license is completely meritless based upon the Chief Civic Affairs Officer's reasoning that by showing listings of third parties unrelated to my client that state that the property sleeps more than Twenty (20) somehow equates to my client willfully withholding or falsifying information on his license application when my client affirmatively checked the box that reflects that my client would have more than 10 people occupying the property.

My client has never confirmed any changes in their Vacation Rental Application in writing and has never willfully withheld or falsified any information in the acquisition of a vacation rental license.

This revocation of my client's Vacation Rental License is due strictly to numerous neighbors who continually harass my client and launch false complaints to the City, while my client is abiding by the rules set forth by the City of Hollywood.

In the event my client's Vacation Rental License is not reinstated my client will take legal action by filing an action for declaratory judgment against the City of Hollywood pursuant to Florida Statue 86.021, concerning the City's misinterpretation and misapplication of the city ordinance that has been used to strip my client of his privilege to operate his vacation rental business.

Please advise if the City of Hollywood would like my client to reapply for a new vacation rental license in addition to obtaining any additional licenses for occupancies over 10 guests.

If you wish to discuss the matter further, please feel free to reach me at (954) 769-1344 or casey@rosenbergcummins.com.

Sincerely,

Casey R. Cummings, Esq.
For the Firm