

January 19, 2023

SENT VIA U.S. MAIL

Department of Legal Affairs
Collins Building
107 W. Gaines Street L66
Tallahassee, FL 32399

Re: *Compensation Claim Against the Town of Palm Beach, Florida, a political division of the State of Florida (the "Town"), pursuant to the Bert J. Harris, Jr., Private Property Rights Protection Act as set forth in Fla.Stat. § 70.001 (the "Bert Harris Act").*

Ladies and Gentlemen,

I am the attorney for the Town of Palm Beach, Florida. Pursuant to Florida Statute Section 70.001 (4)(b), please see the attached claim. The name of the employee with whom additional information may be obtained is Wayne Bergman, the director of planning, zoning and building. Mr. Bergman's phone number is (561) 227-6426 and his address is 360 S. County Road, Palm Beach, FL 33480. You may also contact the undersigned who can provide information from a legal standpoint relating to this matter.

For your information, I have advised the attorney for the claimant as well as my client that this is not a valid Bert Harris claim as it was filed by an adjacent property owner, not the property against which the ordinance was applied.

Please see *Hardee County v. FINRII, Inc.*, 221 So. 3d 1162, 1163 (Fla. 2017) and *Vale v. Palm Beach County*, 259 So. 3d, 951, 953 (Fla. 4th DCA 2018).

Thank you.

JONES FOSTER P.A.



John C. Randolph, Esq.

enclosure

cc: Wayne Bergman
 Kirk Blouin

E S T .
1 9 2 4

jrandolph@
jonesfoster.com
561-650-0457 T
561-650-5300 F

505 S. Flagler Drive
Suite 1100
West Palm Beach
Florida 33401