

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT  
IN AND FOR FLAGLER COUNTY, FLORIDA

JASON PAVLOW, an individual,  
d/b/a WATERSIDE POOLS INC., a  
Florida Profit Corporation

v.

CASE NO.: 2018-CA-000122

DANIEL PRIOTTI, an individual,  
d/b/a AGUA CONSTRUCTION COMPANY,  
a Florida Profit Corporation and,  
d/b/a AGUA POOLS AND SPA, INC., a  
Florida Profit Corporation

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**PLAINTIFF'S SECOND AMENDED COMPLAINT FOR DEFAMATION**

Plaintiff, JASON PAVLOW, (hereinafter, "Mr. Pavlow" or "Plaintiff"), by and through his undersigned counsel, sues Defendant, DANIEL PRIOTTI (hereinafter, "Priotti" or "Defendant") d/b/a AGUA CONSTRUCTION COMPANY (hereinafter, "Agua Construction"), and d/b/a AGUA POOLS AND SPA, INC. (hereinafter, "Agua Pools"), Florida Profit Corporations, for damages, and in support thereof would allege as follows:

**JURISDICTION AND  
VENUE**

1. This is an action for slander seeking damages in excess of \$15,000 exclusive of interest, costs and attorneys' fees.
2. Plaintiff, JASON PAVLOW, is an individual who resides in Flagler County, Florida.
3. Plaintiff WATERSIDE POOLS is Florida For Profit Corporation licensed to conduct business in the State of Florida with its principal place of business located in Flagler County, Florida.
4. Plaintiff regularly conducts business in Flagler County, Florida.
5. Defendant, DANIEL PRIOTTI, is an individual who resides in Flagler County, Florida.
6. Defendant corporation, AGUA CONSTRUCTION COMPANY, is a

corporation, incorporated under the laws of the State of Florida, and is engaged in business in Flagler County, Florida.

7. Defendant corporation, AGUA POOLS AND SPA, INC. is a corporation, incorporated under the laws of the State of Florida, and is engaged in business in Flagler County, Florida.

8. Jurisdiction and venue are properly vested in this Court as the incidents giving rise to the foregoing tortious allegations took place in Flagler County, Florida, and the harm to the Plaintiff was felt in Flagler County, Florida.

9. All conditions precedent to maintain this action have been performed, have been excused, have been waived or have otherwise occurred. Specifically, Plaintiff has provided Defendant with pre-suit notice and a demand for a retraction pursuant to Florida Statutes Chapter 770.0 I, et seq. See **Exhibit A**.

#### **GENERAL ALLEGATIONS**

10. Commencing on or about August 18, 2017 Plaintiffs company received negative comments on social media (Facebook) which originated from Julie Beck Sabine's post and Plaintiff's was tagged in the post.

11. On or about August 18, 2017, and August 19, 2017 the above mentioned negative comments were posted on social media See **Exhibit B**.

12. The statements made in Exhibit A are untrue.

13. The negative comments were posted in response to social media recommendations for a pool construction company.

14. PLAINTIFF'S pool construction company was highly recommended in a response.

I 4. Upon information and belief, out of spite and in a misguided attempt to gain a competitive edge DEFENDANT posted egregious and false statements about PLAINTIFF and PLAINTIFF'S company.

15. Defendant sought to harm the PLAINTIFF by inaccurately portraying PLAINTIFF and PLAINTIFF'S company.

**COUNT I:**  
**DEFAMATION AND DEFAMATION PER SE**

16. PLAINTIFF re-alleges and re-asserts the allegations set forth in paragraphs 1-15 as if fully set forth herein.

17. Defendant, DANIEL PRIOTTI, posted false and defamatory statements concerning Plaintiff JASON PAVLOW, and Plaintiff's company WATERSIDE POOLS INC., without privilege to do so.

18. The false and defamatory statements included, but are not limited to, allegations that:

- a. Mr. Pavlow's company is a "sales team that builds pools".
- b. Mr. Pavlow "paid someone to sign off on his license".
- c. Mr. Pavlow "goes around bad mouthing everyone in town".
- d. Mr. Pavlow has "a few lawsuits in the works".
- e. Mr. Pavlow's Company, Waterside Pools, received "false awards".
- f. Mr. Pavlow's company Waterside Pools "have more comments then pools" in the palm coast biz web site.
- g. Mr. Pavlow obtained his license in an illegitimate manner.
- h. Defendant criticized Plaintiffs workmanship without having direct knowledge of Plaintiff's workmanship.

19. PLAINTIFF is not a public figure, nor is he a limited public figure for purposes of a defamation analysis.

20. No reasonable person could have concluded that the statements mentioned above referred to anyone other than PLAINTIFF and PLAINTIFF'S company.

21. The defamatory statements were posted without privilege to third parties, which include thousands or tens of thousands who read social media.

22. The defamatory statements were made negligently; without reasonable care as to their truth or falsity; with knowledge of their falsity; and/or with reckless disregard for the truth.

23. DEFENDANT was under a duty to fully investigate the veracity of the allegations made in the statements and was negligent in failing to do so.

24. The statements are of the kind that would tend to prejudice the PLAINTIFF in the eyes of the community.

25. The statements are of the kind that would tend to prejudice the PLAINTIFF'S business in the eyes of the community.

26. The statements will harm PLAINTIFF'S standing in the community as well as his professional reputation.

27. The statements have caused, and will continue to cause, the PLAINTIFF injury in his personal, social, and business relations.

28. On information and belief PLAINTIFF and PLAINTIFF'S company WATERSIDE POOLS INC. have suffered, and will continue to suffer, actual injury as a result of injury to PLAINTIFF'S corporate reputation based on the defamatory statements posted by the DEFENDANT.

29. On information and belief, the statements have caused, and will continue to cause, injury to PLAINTIFF'S business.

30. On information and belief potential customers will decline to do business with PLAINTIFF and PLAINTIFF'S company WATERSIDE POOLS INC., based on the defamatory statements posted by the Defendant.

31. DEFENDANT'S false statements regarding PLAINTIFF and PLAINTIFF'S company were made with express, deliberate, and premeditated malice out of ill-will, hostility, and with a purpose to bring harm to PLAINTIFF and PLAINTIFF'S company.

32. The defamatory statements tend to injure PLAINTIFF in his business trade as the allegations call into question PLAINTIFF'S workmanship and operation of PLAINTIFF'S business. The above-mentioned statements subject PLAINTIFF to distrust, scorn, ridicule, hatred, and contempt. Therefore, the defamatory statements constitute defamation per se.

33. Under Florida law, a civil action for libel will lie when there has been a false and unprivileged publication by letter, or otherwise, which exposes a person to distrust, hatred,

contempt, ridicule or obloquy or which causes such person to be avoided, or which has a tendency to injure such person in his office, occupation, business or employment. Thomas v. Jacksonville Television, Inc., 699 So. 2d 800 (Fla. Dist. Ct. App. 1997)

34. As a direct and proximate result of the foregoing, Plaintiff, JASON PAVLOW, and WATERSIDE POOLS JNC., has suffered damages to his reputation and good name, as a matter of law, and his business has suffered as a direct result.

35. Defendant has exposed Plaintiff, JASON PAVLOW, and WATERSIDE POOLS INC., to distrust, hatred, contempt, ridicule or obloquy or which causes JASON PAVLOW, and WATERSIDE POOLS INC., to be avoided within the community.

36. Plaintiffs have mitigated his losses to the best of his ability.

**WHEREFORE**, Plaintiffs JASON PAVLOW, and WATERSIDE POOLS INC., demands judgment against Defendant, DANIEL PRIOTTI, and Defendant Company AGUA CONSTRUCTION COMPANY and Defendant Corporation AGUA POOLS AND SPA, INC. for damages. Damages sought include:

- a. Compensatory damages according to proof;
- b. Prejudgment interest as allowed by law;
- c. Costs of suit;
- d. Attorney's fees, and
- e. Such other and further relief as this court may deem just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiffs JASON PAVLOW, and WATERSIDE POOLS INC. hereby demand a trial by jury on all issues so triable.

**Respectfully submitted this 21<sup>st</sup> day of May.2018 by:**

s/ Justin R. Infurna Esq.  
Justin R. Infurna Esq.  
Florida Bar No.: 0084284

The Infurna Law Firm, P.A.  
Attorney for Defendants  
121 South Orange Ave., Ste. 1500  
Orlando, Florida 32801  
Tel. (800) 774-1560  
Fax (800)774-1560  
**[justin@infurnalaw.com](mailto:justin@infurnalaw.com)**

**EXHIBIT "A"**

**THE**  
**INFURNA**  
**LAW FIRM, P.A.**

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January 11, 2017

**By E-Mail and by Hand Delivery**

Mr. Daniel Priotti  
Agua Pools and Spa, Inc.  
1410 Ridgewood Avenue  
Holly Hill, FL 32117

Re: Jason Pavlow and Waterside Pools Inc.

Dear Mr. Priotti:

Please be advised that this office represents Mr. Jason Pavlow ("Mr. Pavlow"), and Waterside Pools Inc. ("Waterside Pools"), a Florida Corporation. Please direct all future communications to my Law Office directly.

This letter shall serve as written pre-suit notice pursuant to Florida Statutes Chapter 770.01, et seq., to inform you that Mr. Pavlow and Waterside Pools intends to initiate litigation against you individually and Agua Pools and Spa, Inc. in response to a Facebook post you contributed to. This Facebook post started on August 18 at 4:51 pm by Julie Beck Sabine, and was titled "I need a good recommendation for a pool builder".

As you are aware, you contributed to the above-mentioned Facebook post with various false and misleading allegations and various false statements concerning, Mr. Pavlow and Waterside Pools.

More specifically you made the following assertions:

**"Dan Priotti** They asked for a pool builder not a sales team that builds pools. Lol sorry had to say it."  
August 18 at 7:18 pm

**"Dan Priotti** Like I said pool sales men, voted best around is who ever sends in most tally votes and one can vote as many times as they want. Just curious Jason do you tell your clients you PAid someone to sign off that you worked for them as a foremen when in fact you only were their pool sales man?"  
August 19 at 11:02 am



**“Dan Priotti** Gene Knight it's not BS that he paid someone to sign off on his license that he worked as a foreman for them when in fact he was a sales man. Also I do t appreciate the fact he goes around bad mouthing everyone in town when he a few lawsuits in the works. I am who I am, my character is of an honest straight forward builder, one who didn't have to pay off someone to activate my license.”

August 19 at 2:57 pm

**“Dan Priotti** Gene Knight also client like honesty not dishonesty, go look at your palm coast biz you have more comments then pools you've guys built. it's hilarious.”

15 hrs Edited

**“Dan Priotti** Jason Pavlow I don't file for awards like that. Voted best around. It's total BS and you know it. As for your experience and expertise, show me your W-2's that you work as a foreman for any pool company he'll even as a labor. I'm holding 3 statements from customers you have bad mouth me to. Professional or not, I didn't have to lie to activate my license.”

August 19 at 3:35 pm Edited

**“Dan Priotti** Jason Pavlow I'm sorry 91 colechester.”

August 19 at 3:33 pm

**“Dan Priotti** Jason Pavlow maybe I should just ask the state to have you provide w-2's for proff to had activated your license. What do you think? I've seen contractor license taken away for lying about things to activate license. Yes have your attorney call me, that would be wonderful. We can discuss all this.”

August 19 at 3:39 pm

**“Dan Priotti** See when You dont file to be added your not on there for people to vote. I dont need false awards.”

August 19 at 6:06 pm Edited

Mr. Priotti, I want it to be very clear, that not one of your statements are based upon true and accurate facts, and I would like for you to know that:

1. Mr. Pavlow builds pools;
2. Mr. Pavlow did not pay “someone to sign off on his license”;

**THE**  
**INFURNA**  
**LAW FIRM, P.A.**

---

3. Mr. Pavlow did not “pay off someone to activate” his license;
4. Mr. Pavlow has not gone “around bad mouthing everyone in town”;
5. Mr. Pavlow does not have “a few lawsuits in the works”;
6. Mr. Pavlow did not get any “false awards”.
7. Mr. Pavlow’s company Waterside Pools does not “have more comments than pools” in the palm coast biz web site.

Your statements are clearly not true, and you have no reason to believe your statements could be true. It is clear you did not make any efforts to validate the facts before you made your untrue statements. Your statements have not been validated, because if you did research the facts you would know and understand the statements you made in the Facebook post are not true.

You made statements on social medial without taking into consideration the negative impact the statements have caused and will continue to cause to Mr. Pavlow and his business Waterside Pools. By making the above-mentioned statements you have clearly shown that you have no regard for the immediate harm you have caused to Mr. Pavlow and his business Waterside Pools, and have no regard as to the future harm the statements will continue to cause to Mr. Pavlow and his business Waterside Pools. You did not validate the facts that you presented to be true, and your actions have caused harm to another. The damage you have caused to Mr. Pavlow and his business Waterside Pools is predictable, foreseeable, current, and ongoing.

Mr. Pavlow and his business Waterside Pools had a remarkable reputation with clients, other contractors, vendors, financial institutions, and more importantly the general public. I mention “had a remarkable reputation” because your post on Facebook has forever tarnished the personal reputation of Mr. Pavlow and the reputation of his business Waterside Pools. The damage you have caused is immediate, will be forever and far reaching. It is extremely disturbing that you made a conscious effort to damaged Mr. Pavlow’s livelihood by making the statements you made of Facebook.

Pursuant to Florida Statute, Mr. Pavlow is demanding an immediate and complete retraction of the libelous statements in a manner designed to be as visible as the original

social media post. As previously mentioned Mr. Pavlow intends to litigate this matter, and the retraction does not relieve you from any possible punitive damages, as there are no reasonable grounds for believing that your statements are true. Mr. Pavlow may consider a retraction to be a positive step toward any possible discussion of an amicable resolution to this matter.

If you or your counsel would like to discuss this matter prior to the initiation of litigation, please feel free to contact me within 5 (five) days from receiving this letter.

Sincerely,

/s/ Justin R. Infurna  
Justin R. Infurna, Esquire

**121 South Orange Avenue, Suite 1500  
Orlando, FL 32801  
Phone: 1-800-774-1560  
Fax: 407-386-3419**

**www.alwaysavailablelawyer.com  
Justininfurna@alwaysavailablelawyer.com  
"The always available lawyer"**

**EXHIBIT "B"**

**Julie Beck Sabine**  
August 18 at 4:51pm · Palm Coast ·


English (US) · Español · Português (Brasil) ·  
Français (France) · Deutsch


### I need a good recommendation for a pool builder.


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Like Comment Share

2


 **Diana Costa** The one over by shears on palm coast parkway is amazing!  
Like · Reply · August 18 at 4:51pm


 **Tom Hickey** Keith Payne  
Like · Reply · 1 · August 18 at 4:52pm


 **Tom Hickey** Angeleque Payne  
Like · Reply · August 18 at 4:52pm


 **Vicki Rhenemus** Ditto  
Like · Reply · 1 · August 18 at 11:11pm


 Write a reply...


 **Sabrina Tabaku** Tom Giben  
Like · Reply · 1 · August 18 at 4:59pm


 **Jacqueline Sigel** (scovelli) Agus  
Like · Reply · 2 · August 18 at 5:03pm


 **Billy Kogler** Waldhauser and son use to be the guy.  
Like · Reply · 1 · August 18 at 5:04pm


 **Rachel Walters** Me too  
Like · Reply · August 18 at 5:06pm


 **Michelle Motta** Kistofus Waldhauser and son  
Like · Reply · 1 · August 18 at 5:08pm

 **Luni Gilham** McBride Agus construction  
Like · Reply · 1 · August 18 at 5:11pm


 **Lorraine Mayes** Gene Knight Waterside Pools inc.  
Like · Reply · 1 · August 18 at 5:13pm

 **Dan Priotti** They asked for a pool builder not a sales team that builds pools. Lol sorry had to say it.  
Like · Reply · 1 · August 18 at 7:18pm


 **Julie Beck Sabine** Dan Priotti is meeting them tomorrow  
Like · Reply · 1 · August 18 at 7:37pm


 **Carolyn Keegan** Case-Lemore is Dan Priotti a pool builder Julie? I  
am looking for one as well. [See](#)


Search


 **Julie Beck Sabine** Yes Carolyn Keegan Case-Lemore  
Like · Reply · August 19 at 8:36am


 Write a reply...


 **Kathy Appell** Ohanu pools is in Palm Coast  
Like · Reply · August 18 at 5:21pm


 **Lisa Paulk** Hogan Crystal Clear just finished mine in C section! Beautiful!  
Like · Reply · August 18 at 5:24pm


 **Angeleque Payne** Keith Payne YOU WONT FIND ANYONE BETTER. IN  
BUSINESS 40 YEARS  
Like · Reply · August 18 at 5:24pm

 **Gina Eckert** 3 6's custom concrete and pools out of hagle beach.  
Like · Reply · August 18 at 5:27pm

 **David Pflimsey** Agus  
Like · Reply · 1 · August 18 at 5:44pm

 **Trevis Kaufman** Agus pools  
Like · Reply · 1 · August 18 at 5:11pm · Edited

 **Daanna Newkirk** Tom Giben east coast pools  
Like · Reply · August 18 at 6:02pm

 **Leann Magone** Caridi Dan Priotti

Chat (12)



Kelly McManey Pool Captain

Like · Reply · August 18 at 7:27pm



Sai Lazzano Dan prion very good pool builder

Like · Reply · August 18 at 7:35pm



Ed Polay Exquisite Casey the owner is meticulous. His details are above the local guys by far.

Like · Reply · August 18 at 7:46pm · Edited



Terri Medina Julie Sessor Pools has built 3 pools for us. Family owned and does an excellent job.

Like · Reply · August 18 at 8:31pm



Stacey Mosher-Knight Jason Pavlow

Like · Reply · August 18 at 8:34pm



Jason Pavlow Waterside Pools Inc has been voted the Best Pool and Spa builder in Flagler county for 8 years. That is not just by luck. I would say the community as a whole has spoken. I would suggest going to WatersidePool.com to get some great ideas. Then you may want to go to the showroom to see the quality and professionalism in person at 15 Hargrove Lane #31 Palm Coast

Waterside Pools Inc

Waterside Pools Inc offers a full range of custom swimming pool, spa design & construction services...  
EZFLOWPOOLS.COM

Like · Reply · Remove Preview · August 18 at 8:44pm

Hide 14 Replies



Dan Priotti Like I said pool sales men, voted best around is who ever wants in most tally votes and one can vote as many times as they want. Just curious Jason do you tell your clients you Paid someone to sign off that you worked for them as a foreman when in fact you only were their pool sales man?

Like · Reply · August 18 at 11:02am



Gene Knight Hey Dan just a word of advise, clients don't appreciate a contractor who feels the need to call out another contractor with some BS on a public forum to try to make themselves look better. That says a lot about your character as a businessman.

Like · Reply · August 19 at 11:27am



Julie Beck Sabine Hey Jason it's Julie yes I gave the buyers your information they would like to meet with you can you please let me know when you're available

Like · Reply · August 19 at 12:12pm



Jason Pavlow That's very professional Dan I empathize with the pain you feel for not winning even 1 year... especially since you've been here so long. You have no idea my contractor history, or of my expertise and experience. Your borderline slanderous statements / question is false and ignorant.... See More

Like · Reply · August 19 at 12:40pm · Edited



Jason Pavlow Julie Beck Sabine I will have one of my designers call you to set something up. You are on my special list 😊

Thank you.  
Like · Reply · August 19 at 12:25pm



Dan Priotti Gene Knight it's not BS that he paid someone to sign off on his license that he worked as a foreman for them when in fact he was a sales man.

Also I do not appreciate the fact he goes around bad mouthing everyone in town when he is a few lawsuits in the works. I am who I am, my character is of an honest straight forward builder, one who didn't have to pay off someone to activate my license.

Like · Reply · August 19 at 2:57pm



Dan Priotti Gene Knight also client like honesty not dishonesty, go look at your palm coast but you have more comments than pools you've guys built... it's hilarious. What about 91 Colechester? You guys ever decide to go back and fix your below par quality work? Or your still dealing with that one?

Like · Reply · 15 hrs · Edited



Jason Pavlow Dan Priotti I have never had a lawsuit against me or Waterside Pools Inc. Nor do I have, or ever had a project at that address you referred too. You will be hearing from my attorney

Like · Reply · August 18 at 3:29pm

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Chat (12)

Thank you.

Like · Reply · 2 · August 19 at 12:25pm



Dan Priotti Gene Knight it's not BS that he paid someone to sign off on his license that he worked as a foreman for them when in fact he was a sales man.

Also I do t appreciate the fact he goes around bad mouthing everyone in town when he a few lawsuits in the works. I am who I am, my character is of an honest straight forward builder, one who didn't have to pay off someone to activate my license.

Like · Reply · August 19 at 2:57pm



Dan Priotti Gene Knight also client like honesty not dishonesty, go look at your palm coast biz you have more comments then pools you've guys built... it's hilarious. What about 91 Colechester . You guys ever decide to go back and fix your below par quality work? Or your still dealing with that one?

Like · Reply · 15 hrs · Edited



Jason Pavlow Dan Priotti I have never had a lawsuit against me or Waterside Pools Inc. Nor do I have, or ever had a project at that address you refered too. You will be hearing from my attorney.

Like · Reply · August 19 at 3:29pm



Dan Priotti Jason Pavlow I don't file for awards like that. Voted best around. It's total BS and you know it. As for your experience and expertise, show me your W-2's that you work as a foreman for any pool company he'll even as a labor. . I'm holding 3 statements from customers you have bad mouth me to. Professional or not. I didn't have to lie to activate my license.

Like · Reply · August 19 at 3:35pm · Edited



Dan Priotti Jason Pavlow I'm sorry 91 colechester.

Like · Reply · August 19 at 3:33pm



Dan Priotti Jason Pavlow maybe I should just ask the state to have you provide w-2's for profit to had activated your license. What do you think? I've seen contractor license taken away for lying about things to activate license. Yes have your attorney call me, that would be wonderful. We can discuss all this.

Like · Reply · August 19 at 3:39pm



Jason Pavlow I honestly don't know what you are talking about, but you have made a mistake with your foolish rant.

Like · Reply · August 19 at 3:49pm



Dan Priotti ok

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Chat (16)

expensive, know the you who's that you work as a contractor for any pool company he'll even sit a labor... I'm holding 3 statements from customers you have bid through me to. Professional or not, I didn't have to lie to activate my license.

Like · Reply · August 19 at 3:35pm · Edited

**Dan Priotti** Jason Pavlow I'm sorry 81 colchester  
Like · Reply · August 19 at 3:13pm

**Dan Priotti** Jason Pavlow maybe I should just ask the state to have you provide w-2's for proof to had activated your license. What do you think? I've seen contractor license taken away for lying about things to activate license. Yes have your attorney call me. that would be wonderful. We can discuss all this.

Like · Reply · August 19 at 3:39pm

**Jason Pavlow** I honestly don't know what you are talking about, but you have made a mistake with your foolish rant.

Like · Reply · August 19 at 3:49pm

**Dan Priotti** ok

Like · Reply · August 19 at 4:14pm

**Dan Priotti** See when You don't file to be added your not on there for people to vote. I don't need false awards

Like · Reply · August 19 at 4:14pm

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Like · Reply · August 19 at 6:06pm · Edited

Write a reply...

**Michael Shane Lawhorn** Blue water pools

Like · Reply · August 19 at 7:51am

**Carmen Bongiovanni** Pool Captain

Like · Reply · August 19 at 7:53am

**J Stephen Thompson** Talk with Chuck and Tiffany Evans first it could save you big \$\$\$ !!! Is Lef Halvorsen still do pools ???

Like · Reply · August 19 at 11:00am

**Dan Priotti** Lef went out in the down turn but Mickey Ryan who owns orange pools is around they are another good builder.

Like · Reply · August 19 at 11:23am · Edited

**Lef Halvorsen** Thanks for the shout out Steve, (North Development, LLC). Still doing a solid few. Julie can contact me at northlefl@yahoo.com. The attached pic is one of my recent completions, built for Richard and Miranda Palmer of Flagler Beach, who would just love to talk to you about my qualifications. That said, I am fairly well booked for the short term but would be happy to take a look.



Like · Reply · August 19 at 2:35pm · Edited

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Write a reply...

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Like · Reply · 2 · August 19 at 2:36pm · Edited

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Write a reply...



**Micky Ryan** Do your homework, several pool builders have been mentioned and all have good reputations ask friends locally and look at recent finished product, be careful of builders who are too far out of town because you might not get the prompt service you are l... See More

Like · Reply · 2 · August 19 at 11:35am · Edited



**Danielle Mulford-Pierro** Waterside Pools

Like · Reply · 1 · August 19 at 2:59pm



**Leif Halvorsen** Yes, and further to Micky Ryans long list of precautionary measures, don't forget to check the Arrest Records of all the principals involved in your project. You wouldn't want to find out you've just signed a \$50,000.00 contract with a REALLY unsavory character, right?

Like · Reply · 1 · August 19 at 3:58pm



**Dan Priotti** HEY I LIKE MY MUG SHOT lol... aS YOU CAN SEE FROM HERE Ttheir mainly for being a loud mouth who doesnt take shit from anyone. Just because someone has been arrested doesnt mean they are guilty and just becuaese someone has been arrested do not mean their unsavory..nor are they a felon. Just saying. My loud mouth always gets me in trouble..lol

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**Leif Halvorsen** Sorry Dan, not directed at you in any way. My comment was directed toward people who are actually dangerous; the type of con artists and frauds, who are so full of themselves that they actually forget how they walk over the backs of friends and coworkers... See More

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Susan Masten Raymond Waterside

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Jeanne Seybold I just sent two clients to Jason Paviow - Waterside pools Highly recommend!

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Steve Jones Pool Captain is the best.

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