

**County Attorney**  
1769 E. Moody Blvd Bldg 2  
Bunnell, FL 32110



[www.flaglercounty.org](http://www.flaglercounty.org)  
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Fax: (386) 313-4105

May 16, 2019

Certified Mail -- Return Receipt Requested

Margaret Sheehan-Jones, CCIM  
c/o Parkside Realty Group  
145 City Place, Suite 104  
Palm Coast, FL 32164

Dear Ms. Sheehan-Jones:

Per the instruction of the County Administrator of Flagler County, the County is placing you on notice that it will be pursuing claims against you, personally and corporately, for your failure to disclose the existence of water intrusion into the building you presented to the County for purchase and located at 4888 Palm Coast Parkway NW, Palm Coast, Florida.

The evidence on site shows unmistakably that the water intrusion was of long-standing. The water intrusion damaged the sheet rock and rusted metal parts within the building and in some places rusted through. The degree of water intrusion and its volume and repetition have created substantial, hazardous black mold. The building is unsuitable for occupation.

The County does not know whether you knew of these conditions. If you did not, the County believes it was your duty under the circumstances to be aware of the suitability of the building for public governmental purposes. You sold the County the former hospital in Bunnell. The County constructed a new Sheriffs Operations Center on that site. Dominating the news for at least two years are the media accounts and public hearings delving into the influence of water intrusion on the health of individuals who worked in the building. Affected employees filed numerous workers compensation claims. The media has extensively covered these proceedings. As well, the County has spent thousands of dollars to test the site, likewise covered by the media.

It is inconceivable to the County that this context would have escaped your attention. It should have alerted you to the need to present only properties to the County, including this one, which are suitable for consideration for public use. By your providing the County with an unsuitable property, the County is exposed to the considerable expense and time of evaluating it for purchase.

**Charles Ericksen, Jr.**  
District 1

**Greg Hansen**  
District 2

**David Sullivan**  
District 3

**Joe Mullins**  
District 4

**Donald O'Brien, Jr.**  
District 5

It is important to note that the County viewed you as a credible broker and relied on your expertise regularly. Consequently, the County cannot ignore your failure to disclose what you knew or should have known with an examination of the property and interaction with your clients.

The County has collected evidence, including video and photographs in addition to onsite inspection of the conditions in the building.

The County will be seeking damages against you for your responsibility in this transaction.

Please advise the County of all insurance policies you may have in your name or in any real estate brokerage company with which you are affiliated. Please provide the names of the claims agent for each such policy. We will share our evidence referenced above with your insurers in order that claims may be processed.

Thank you for your prompt cooperation.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Al Hadeed", followed by a long horizontal flourish.

Al Hadeed

County Attorney

cc: Jerry Cameron, County Administrator