

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT
IN AND FOR WALTON COUNTY, FLORIDA**

BEACH LIFE LAND TRUST; MONTIGO
DEVELOPMENT LAND TRUST; SANTA
CLARA LAND TRUST; COASTAL RESOURCES
LAND TRUST NO. 1; and COASTAL RESOURCES
LAND TRUST NO. 5,

Plaintiffs,

CASE NO.: 2019-CA-217

V.

WALTON COUNTY, FLORIDA,

Defendant.

PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINT

COME NOW, Plaintiffs BEACH LIFE LAND TRUST, MONTIGO DEVELOPMENT LAND TRUST, SANTA CLARA LAND TRUST, COASTAL RESOURCES LAND TRUST NO. 1, and COASTAL RESOURCES LAND TRUST NO. 5 ("Property Owners"), by and through undersigned counsel, pursuant to Rule 1.190(a), (e), Fla. R. Civ. P., and hereby move this Court for an Order granting leave to file a Second Amended Complaint and for cause states as follows:

1. On or about July 19, 2019, Property Owners filed their Amended Complaint in the Circuit Court of Walton County.
2. Defendant filed a Motion to Dismiss on or about October 8, 2019.
3. Plaintiffs have addressed the issues raised in Defendant's Motion to Dismiss in the Second Amended Complaint attached hereto as Exhibit "1."

4. This motion is brought in good faith, is not for the purposes of delay, will not result in unfair prejudice to any parties, and amendment is not futile.
5. Defendant's counsel has stated that he has no objections to the filing of Plaintiffs' Second Amended Complaint.

WHEREFORE, and for the foregoing reasons, Plaintiffs respectfully request that this Court enter an Order granting leave for Plaintiffs to file the Second Amended Complaint, deeming filed the Second Amended Complaint attached hereto as Exhibit "1," and providing such other relief as the Court deems just and proper.

Dated this 19th day of November 2019.

/s/ A. Benjamin Gordon

A. Benjamin Gordon

Florida Bar No.: 528617

Andrea Ansley

Florida Bar No.: 0680516

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CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing was electronically filed through the Florida E-Portal, which will give notification to William G. Warner, Warner Law Firm, as counsel for Walton County, to pleadings@warnerlaw.us, this 19th day of November, 2019.

/s/ A. Benjamin Gordon

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UNOFFICIAL
DOCUMENT

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT
IN AND FOR WALTON COUNTY, FLORIDA
CIVIL DIVISION

BEACH LIFE LAND TRUST;
SANTA CLARA LAND TRUST; COASTAL RESOURCES
LAND TRUST NO. 1; and COASTAL RESOURCES
LAND TRUST NO. 5,

Plaintiffs,

CASE NO.: 2019-CA-217

v.

WALTON COUNTY, FLORIDA,

Defendant.

SECOND AMENDED COMPLAINT

Plaintiffs BEACH LIFE LAND TRUST, SANTA CLARA LAND TRUST, COASTAL RESOURCES LAND TRUST NO. 1, and COASTAL RESOURCES LAND TRUST NO. 5 (“Property Owners”), by and through undersigned counsel, sue Defendant WALTON COUNTY, FLORIDA (“County Government”), and allege as follows:

Jurisdiction and Venue

1. This is an action for quiet title as well as for relief under Article X, Section 6a of the Florida Constitution and the 4th and 5th Amendments of the U.S. Constitution related to continuing, unlawful use of private property by the County Government, over which this Court has subject matter jurisdiction, and for supplemental injunctive and monetary relief related thereto in excess of \$15,000.00.
2. The County Government is a political subdivision of the State of Florida.

3. Pursuant to section 48.193, Florida Statutes, this Court has personal jurisdiction over the County Government, which maintains multiple offices throughout Walton County.
4. Venue is proper in Walton County, pursuant to section 47.011, Florida Statutes, because the causes of action pled herein accrued in Walton County.

The Parties

5. Property Owners are the exclusive, fee-simple absolute owners of private real property lying along Scenic Gulf Drive and north of the Gulf of Mexico, the east and west boundaries of which are established in the public records of Walton County (collectively referred to herein as the "Private Real Property").
 - a. Beach Life Land Trust is the fee simple owner of the property described as: the southern portion of land proposed as Montego Avenue and extending over remnant land and beach property of Beach Life Land Trust south to the Gulf of Mexico, as depicted on the Gulf Shore Manor Depiction, as recorded in Walton County Official Records (DB 63, PG 603–606). The subject property is referred to herein as the "Beach Life Property." A survey of the subject property is attached as Exhibit "B-1".
 - b. Santa Clara Land Trust is the fee simple owner of the property described as: a segment of remnant land initially proposed as part of Willow Street adjoining Santa Clara Drive, as proposed on the Gulf Shore Manor Depiction, as recorded in Walton County Official Records (DB 63, PG 603–

606). The subject property is referred to herein as the “Santa Clara Property.” A survey of the subject property is attached as Exhibit “B-3”,

- c. Coastal Resources Land Trust No. 1 is the fee simple owner of the property described as: a segment of remnant land initially proposed as part of Willow Street adjoining Pelayo Avenue, as proposed on the Gulf Shore Manor Depiction, as recorded in Walton County Official Records (DB 63, PG 603–606). The subject property is referred to herein as the “Coastal Resources #1 Property.” A survey of the subject property is attached as Exhibit “B-4”.
 - d. Coastal Resources Land Trust No. 5 is the fee simple owner of the property described as: beachfront property, land for proposed roads, and other remnant land lying north and south of Scenic Gulf Drive, as depicted on the Gulf Shore Manor Depiction, as recorded in Walton County Official Records (DB 63, PG 603–606). The subject property is referred to herein as the “Coastal Resources #5 Property.” Exhibits of the subject property are attached as Exhibits B-5, B-6, B-7 (that portion surveyed lying outside the limits of the existing street), and B-8, C-1, C-2a, C-2b, C-3 and C-4.
6. The Private Real Property is not “public property,” as defined in section 705.101(5), Florida Statutes.
 7. Inherent in Property Owners’ Private Real Property rights are the statutory and common law rights to the exclusive and quiet enjoyment of their Private Real Property. These rights include, but are not limited to, the right to exclude trespassers, any person who is not invited upon the premises by Property Owners, and any person who is not specifically authorized to come upon the Property

Owners' Private Real Property by judicial warrant or a constitutional federal and/or state statute.

Summary of Claim

8. In spite of Property Owner Coastal Resources Land Trust 5 exclusive ownership rights to their Private Real Property, the County Government has permitted, promoted and commended the public to trespass upon Property Owners' Private Real Property which is shown on Exhibits C-1, C-2A, C-2B, C-3 and C-4.
9. Property Owners have complained to the County Government regarding the public trespass of their Private Real Property, however, the County Government has allowed and encouraged the public to continue trespassing over and infringing on Property Owners' property.
10. For other properties of the Private Property Owners, the County Government has failed to grant lot of record requests with allocated density of one unit per lot of record for the lots shown on Exhibits B-1 , B-3, B-4, B-5, B-6, B-7 (that portion surveyed lying outside the limits of the existing street) , and B-8, despite entitlement to the lot of record classifications under the County's Comprehensive Land Use Code, and under the authority of Section 177.101(5) Florida Statutes.

Factual Background

11. On December 7, 1914, John J. Sullivan purchased 142.80 acres of beachfront property in the Seagrove area of Walton County, Florida by sovereign patent deed recorded on January 25, 1916 (DB 39, PG 124).

12. On April 3, 1924, Mildred Feldman purchased these 142.80 acres of beachfront property from John J. Sullivan which deed was recorded on April 21, 1924 (DB 63, PG 157).
13. On July 17, 1925, a depiction of Ms. Feldman's land, labeled "Proposed Plat for G.P. Manus" (the "GSM Depiction"), was recorded in Walton County, Florida, illustrating a conceptual division of the Feldman 142.80-acre tract called Gulf Shore Manor ("GSM") (DB 63, PG 603–606).
14. The original recorded GSM Depiction is comprised of fragments and is incomplete.
15. On or about November 12, 1958, a recreation, of unknown origins, purportedly reproducing the GSM Depiction was inserted into the County records (PB 3, PG 28).
16. It appears that the original GSM Depiction illustrated a conceptual division of Ms. Feldman's 142.80 acres into four types of land: lots, proposed roads, beach, and a remnant strip.
17. Ms. Feldman sold most of the lots, including a hotel site, on or before December of 1925.
18. The last conveyance from Ms. Feldman regarding individual lots within the GSM illustration was recorded on December 7, 1925 (DB 82, PG 142).
19. No recorded map or plat was referenced in any of these deeds from Ms. Feldman, and Ms. Feldman, as fee owner, did not sign or endorse the Depiction.
20. The proposed GSM Depiction did not include any public or private dedications of any street, park, or beach.

21. Very few, if not any, roads were built and maintained by Walton County as per the GSM Depiction for an approximate 45 to 50 years from the date of filing of the Depiction.
22. Many roads running through or built in GSM by Walton County, the State of Florida, or private individuals or entities under permit by Walton County are not in conformity with the GSM Depiction, including Scenic Gulf Drive, Bramble Grove Avenue, Jasmine Circle, Sea Walk Circle, Periwinkle Lane, and a portion of San Juan Avenue south of Scenic Gulf Drive, and constitute a rejection of the original GSM Depiction by the County Government. To this date, only a few of the proposed roads are paved and continuously and uninterruptedly maintained by Walton County in GSM and even these appear to be named differently and not located within any defined parameters for roads as proposed in the Depiction.
23. No documents have been placed of record in the official records of Walton County by book and page number from 1925 until present confirming any legal right of Walton County to a road easement over any Private Real Property of the Property Owners.
24. A notice was placed of record on July 20, 2018, revoking any implied offers to dedicate any proposed road or other remnant land area to the public for all Private Real Property of Property Owners in GSM (OR BK 3079, PG 4686–4694). Despite this notice, Walton County continues to award vendor contracts and to trespass upon the area labeled “Beach” or “Bathing” on the GSM Depiction, continues to trespass upon and assert an easement over other remnant land of Property Owners, and has wrongly and capriciously denied Property Owners’ lot of record

and density requests over remnant tracts of land shown as Exhibits B-1, B-3, B-4, B-5, B-6, B-7 (that portion surveyed lying outside the limits of the existing street), and B-8, despite Property Owners' entitlement to the lot of record and density classifications for their Private Real Property remnant strips under the authority of Florida case law, the lack of any recorded easement, the lack of any actual or implied dedications of the land for easement purposes, the comprehensive land use code of the County Government, and the authority of Section 177.101(5) Florida Statutes.

25. All use of the beach area and the parcels identified in Exhibits C-1 through C-4 by anyone has always been non-exclusive to and consistent with the use of Property Owners.
26. None of the remnant land of Property Owners shown on Exhibits C-1 through C-4 has ever been fenced or used exclusively by the County Government.
27. The County Government has never excluded the Property Owners from any of its Private Real Property.
28. Much of the remnant Private Real Property of Property Owners in GSM, other than that which has been built on by others in the 110-foot remnant strip under permit by Walton County or by the County Government itself for non-road purposes, primarily for parking lots, remains to the present date—95 years since the date the Private Real Property was purchased by Mildred Feldman—in its natural, shrubbed, and vegetative state as it was in the land boom days of early Florida history and constitutes non-user by the County under common law and under the

terms of the Marketable Record Title Act, Section 712.01 et seq. Florida Statutes (“MRTA”).

29. The GSM Depiction included a beach area between the dunes and Gulf of Mexico labeled “Bathing” on one end of the depicted beach area and labeled “Beach” on the opposite end. This beach area did not include a dedication.
30. Finally, the GSM Depiction included an approximate 110-foot unplatted strip of land (the “Remnant Strip”) buffering between the Beach and the southern boundary of Blocks 17 through 20, running from the eastern to western borders of GSM that was ostensibly included in the area labeled “Gulf Shore Beach” or “Gulf Shore Reman” on the Depiction, the latter potentially an abbreviation for “Gulf Shore Remnant Land,” and including a large circular parcel of land south of Santa Clara Avenue and north of the beach area, to the east of the lot labeled “Hotel Site.”
31. The GSM Depiction, filed July 17, 1925, was not a “plat” approved by the County Government as required by the plat law that went into effect on June 11, 1925, Section 15, chapter 10275, Laws of Florida (1925), nor did it meet any other requirement of the 1925 Plat Law.
32. The 1925 Plat law revoked common law dedications by implication for plats or maps filed after June 11, 1925.
33. No rights of dedication were implied by the filing of the GSM Depiction.
34. The County Government has no recorded easement or deed to any Private Real Property of the Property Owners in GSM.

35. The County Government had no legal authority to convert any land allegedly deemed to be under an implied easement or implied use license including that land shown on Exhibits C-1 through C-4 to a non-road use, such as a parking lot.
36. The County Government had no legal authority to trespass upon, build, or maintain any proposed or in-use roads in GSM on land owned by Property Owners, except under section 95.361, Florida Statutes, or an implied non-exclusive use license revocable at will by Property Owners.
37. The Mildred Feldman interest reserved the Beach and the Remnant Strip from 1924 through the present, and all land proposed as road areas have not been built on, are not reasonably necessary for access to any lot, and have not been maintained continuously and uninterruptedly by Walton County. Pursuant to section 95.361 Florida Statutes, the lack of use, which now has extended approximately 95 years, constitutes "non-user" under common law and MRTA, and are not "highways necessary for use by the traveling public" under Section 177.101(5) Florida Statutes. As the County Government has vacated other proposed roads in GSM in 1974 and 1978, including Willow Street west of San Juan Avenue in 1974, and other proposed roads south of County Highway 30A in 1978, to the extent the County had any rights therein, then by operation of Florida law the remnant land tracts in the Private Real Property shown as proposed roads on the GSM Depiction, and which are not maintained continuously and uninterruptedly by the County Government as highways necessary for the use of the traveling public and built and continuously and uninterruptedly maintained by the County Government as authorized by section 95.361 Florida Statutes, would

be vacated by law, under the authority of section 177.101(5) Florida Statutes. The County Government's denial of lots of record and density for the Private Real Property of Property Owners and actions to prevent the marketability of the land of Property Owners is a violation of law, violates real property rights, is wrongful and capricious, and denies uniform and fair application of the County Government's land use code.

38. On February 15, 2018, Beach Life Land Trust acquired the interest in a portion of the real property previously-held by the estate of Mildred Feldman (OR BK 3077, PG 4140), this Beach Life Property being more particularly described as the southern portion of proposed Montego Avenue and other remnant land extending south to the Gulf of Mexico, as shown on the GSM Depiction, and a survey of the property is attached as Exhibit B-1.
39. On February 15, 2018, Santa Clara Land Trust acquired the interest in a portion of the real property previously-held by the estate of Mildred Feldman (OR BK 3077, PG 4148), this Santa Clara Property being more particularly described as a segment of proposed Willow Street between San Juan and Santa Clara Avenues, as shown on the GSM Depiction and a survey of the property is attached as Exhibit B-3.
40. On February 15, 2018, Coastal Resources Land Trust No. 1 acquired the interest in a portion of the real property previously-held by the estate of Mildred Feldman (OR BK 3077, PG 4152), this real Coastal Resources #1 Property being more particularly described as a segment of proposed Willow Street east of Montigo

Avenue, as shown on the GSM Depiction, and a survey of the property is attached as Exhibit B-4.

41. On June 25, 2018, Coastal Resources Land Trust No. 5 acquired the remaining interest in the real property previously-held by and not previously-conveyed from the estate of Mildred Feldman (OR BK 3077, PG 4689). This Coastal Resources #5 Property includes the land tracts attached hereto as Exhibits, B-6, B-7 (that portion surveyed lying outside the limits of the existing street), B-8, and C-1 through C-4.
42. No party has ever quieted title as to the Feldman Interest and no party has ever properly established any rights by adverse possession.
43. The County Government has built upon and over certain Private Real Property of Property Owners, including proposed roadways and other remnant land, parking lots, and beach walk-overs thereby encouraging and allowing the public to trespass across Property Owners' Private Real Property, as shown on Exhibits C-1 through C-4.
44. The County Government has denied and disputed Property Owners' rights, failed to grant lot of record status and with allocated density, and falsely claimed right-of-way easements over said property, which has prevented Property Owners from exercising their private property rights over the subject real properties.
45. In published materials, the County Government has referenced portions of Coastal Resource Land Trust No. 5's Property as public-accessible property, shown on

Exhibits C-1 through C-4 encouraging the public to trespass upon the Private Real Property of Property Owners.

46. The County Government disclaimed, disavowed and vacated all interest of the public and County Government to the parcels labeled on the GSM Depiction recorded in Deed Book 63 at pages 603-606 as "Bathing" or "Beaches" and to the Remnant Tract labeled as "Gulf Shore Reman" or "Gulf Shore Beach" by County Resolution on March 28, 1978, as recorded in O.R. Book 141, Page 653, Public Records of Walton County, Florida. This resolution vacated the Remnant Strip portion of the land shown on Exhibits B-1, B-5 and B-6 and C-1 through C-4.
47. The remnant land of Property Owners not built on as roads by the County Government is not materially beneficial to any future road need of the County Government, does not presently include highways necessary for the use of the traveling public, and has not been built or maintained continuously and uninterruptedly by the County Government pursuant to section 95.361, Florida Statutes, including as a result of non-user of such land for the past 95 years, and the County Government permitted other replats and roads and acquiesced to private and state road constructions inconsistent with the GSM Depiction, which render a significant portion of this remnant land obsolete for future road use and otherwise is a rejection by the County Government of any alleged implied rights created by the filing of the GSM Depiction and as a result Real Property Owners are entitled to lot of record classifications with appropriate density of one unit per lot of record for the properties attached as Exhibits B-1, B-3, B-4, B-5, B-6, B-7 (that portion surveyed lying outside the limits of the existing street), and B-8.

48. From 1924 through the present, the County Government has never built or paved the proposed road listed as "Montego" in the exact location or width as is included on the GSM Depiction, but may occasionally and intermittently maintain a limited distance dirt road named "Montigo" north of Scenic Gulf Highway in the approximate location of the proposed road shown as Montego on the Depiction.
49. From 1924 through the present, the County Government has never built or maintained continuously and uninterruptedly Santa Clara Avenue in the exact location or width as listed as a proposed road on the GSM Depiction with the possible exception of a limited distance of paving north of Scenic Gulf Highway.
50. The County Government has built on or after the year 2012 a parking lot on remnant Coastal Resources #5 Property of Property Owners on a southern portion of proposed Santa Clara Avenue and a portion of proposed Willow Street east of Santa Clara Avenue, without statutory, legal, or contractual authority for such parking lots, receiving approximately \$700,000 in beach nourishment credit value for such parking lots, and has not paid just compensation or provided due process to Property Owners for such use by the County Government of this land which parcels are shown on Exhibit "C-4."
51. From 1924 through the present, the County Government never built or continuously and uninterruptedly maintained San Juan Avenue in the exact location as set forth for a proposed road on the GSM Depiction, but upon information and belief took over occasional maintenance of San Juan Avenue.
52. From 1924 through the present, upon information and belief the County Government did not build or continuously and uninterruptedly maintain any

proposed road in GSM, in the locations as proposed, within 30 years of the filing of the GSM Depiction.

53. From 1924 through the present, the County Government has not built any roads shown as proposed on the GSM Depiction south of Scenic Gulf Highway.
54. From 1924 through the present, the County Government has built or maintained no roads bisecting GSM Depiction from east to west.
55. From 1924 through the present, the County Government has built no roads on land shown as Barcelona Avenue, Pelayo Avenue, Elm Street, Forest Street, or Holly Street as proposed roads on the GSM Depiction, but upon information and belief may occasionally and intermittently maintain some short portions of land proposed as roads.
56. From 1924 through the present, upon information and belief the County Government never built any proposed road on the GSM Depiction and named on the County Records as Elm Street, Holly Street, Forest Street, Montego Avenue, or Gulf Shore Reman or Gulf Shore Beach and none of these proposed street names have appeared on the County Records for any road in GSM, evidencing a rejection of the GSM Depiction by the County Government.
57. The County Government did vacate a portion of Willow Street in 1974 and all of Gulf Shore Beach by County Commission Resolutions in 1978, and granted building permits and replats over much of the Remnant Strip, evidencing a rejection of the GSM Depiction by the County Government.

58. From 1924 until the present, upon information and belief, the County Government has not built a single road in GSM as per the GSM Depiction, but only taken over occasional maintenance of some proposed roads initially built as dirt roads by private parties, evidencing a rejection of the GSM Depiction by the County Government and non-acceptance of any implied rights allegedly attributable therefrom.
59. Plaintiffs have retained undersigned counsel to file this action, and request recovery of portions of their Private Real Property taken by the County Government, to gain the lawful marketable use of their Private Real Property denied by the County Government, and for damages of all attorney's fees and costs incurred in prosecuting this action.

COUNT I

**VIOLATION OF FOURTH AND FIFTH AMENDMENTS OF US CONSTITUTION AS TO
BEACH LIFE LAND TRUST**

60. Beach Life Land Trust realleges and incorporates paragraphs 1 through 4, paragraph 5a, paragraphs 6 through 38, paragraphs 42 through 49, and paragraphs 51 through 59 as if set forth fully herein.
61. Beach Life Land Trust is the owner of the Beach Life Property shown on Exhibit B-1 in fee simple absolute and the Private Real Property enjoys lot of record status, with a density of at least one (1) home site and no County Government or other government agent has the lawful right to enter or build upon Property Owner's Private Real Property without Property Owner's consent, without a judicial warrant, or without a specific, constitutional federal, or state statutory basis for doing so.

62. The County Government asserts that Beach Life Land Trust does not possess such rights and that the County Government's agents are authorized to enter and build upon Beach Life Land Trust's Private Real Property without Property Owner's consent, or without a judicial warrant, and without a specific, constitutional federal, or state statutory basis for doing so.
63. No document has been recorded by book and page in the muniments of Plaintiff's title in the last thirty (30) years declaring any alleged right-of-way of the County Government over Property Owner's Private Real Property.
64. The County Government has not built on as a road, used as a road, or maintained continuously and uninterruptedly as a road over any portion of the Beach Life Property over the past 95 years.
65. Neither Mildred Feldman nor any successor-in-interest ever executed any road easement to the County Government, and neither Mildred Feldman nor any successor-in-interest signed any document offering Property Owner's Private Real Property to the County Government for road easement purposes nor for any other purpose.
66. County Government has not afforded Beach Life Land Trust due process or just compensation for denying the lot of record and density requests, and given this land would be deemed already vacated by operation of section 177.101(5), Florida Statutes, if the County had any such rights, the County Government's failure to provide the lot of record and density acknowledgements is arbitrary and capricious and violates the private property rights of Beach Life Land Trust.

67. The County Government has meaningfully interfered with Beach Life Land Trust's possessory interest by denying lot of record and density status for the Beach Life Property despite being made aware of a pending sales contract for the Beach Life Property which was conditioned on an acknowledgement by the County Government of the lot of record and density rights on this land, causing Property Owner to suffer damages.
68. The above acts were committed under color of state law and intentionally deprived Beach Life Land Trust of the use or enjoyment of its property secured by the United States Constitution and the Fourth and Fifth Amendments and Section 42 USC §1983.
69. The County Government acted intentionally, deliberately, knowingly and without reasonable justification.
70. As a result, Beach Life Land Trust has suffered damages and will continue to suffer damages to its property.

WHEREFORE, Beach Life Land Trust respectfully requests that this Court enter a judgment against Defendant as a result of its unlawful action in violation of the Fourth Amendment of the United States Constitution and for damages, interest, costs, and attorneys' fees pursuant to 42 USC §1988.

COUNT II

VIOLATION OF FLORIDA CONSTITUTION AS TO BEACH LIFE LAND TRUST

71. Beach Life Land Trust realleges and incorporates paragraphs 1 through 4, paragraph 5a, paragraphs 6 through 38, paragraphs 42 through 49, and paragraphs 51 through 59 as if set forth fully herein.
72. The County Government's actions constitute an unlawful taking of property without payment of full compensation in violation of Article X, Section 6(a) Florida Constitution.
73. This claim is ripe for adjudication.
74. The property rights and interests that the Beach Life Land Trust lost are because of the County Government's actions and are fundamental and inherent in its property ownership and rights.
75. The County Government has not afforded Beach Life Land Trust due process or just compensation for the denial of the lot of record and density requests and the County Government's failure to provide the lot of record and density acknowledgements is arbitrary, capricious and violates Beach Life Land Trust's private property rights.
76. The County Government continues to deny lot of record and density status for the Beach Life Property despite being made aware of a pending sales contract for the Beach Life Property which was conditioned on an acknowledgement by the County Government of the lot of record and density rights on this land, causing Property Owner to suffer damages.

77. The County Government's actions constitute a taking of Beach Life Land Trust's property in violation of Article I, Section 9 and Article X, Section 6(a) of the Florida Constitution.

WHEREFORE, Beach Life Land Trust respectfully requests that this Court enter a judgment against Defendant as a result of its actions in violation of the Florida Constitution, that the County Government's conduct amounted to a taking of the Beach Life Land Trust property and for damages, interest, costs and attorneys' fees allowed by law.

COUNT III

QUIET TITLE AS TO BEACH LIFE LAND TRUST

78. Beach Life Land Trust realleges and incorporates paragraphs 1 through 4, paragraph 5a, paragraphs 6 through 38, paragraphs 42 through 49, and paragraphs 51 through 59 as if set forth fully herein.

79. The County Government claims an interest and estate adverse to Beach Life Land Trust's title in the Beach Life Property and these claims constitute a cloud on Beach Life Land Trust's title to the Beach Life Property.

80. The claim of County Government is without any right whatsoever, and County Government has no right, estate, title, lien or interest in or to the Beach Life Property or any part of the property owned by Beach Life Land Trust.

WHEREFORE, Beach Life Land Trust respectfully requests that this Court enter a judgment:

- a. Quieting title to such property and determining that the Property Owner is the exclusive fee-simple absolute owner of the Private Real Property;

- b. awarding damages, if appropriate;
- c. awarding attorney's fees and costs incurred in this action; and

COUNT IV

VIOLATION OF FOURTH AND FIFTH AMENDMENTS OF US CONSTITUTION AS TO SANTA CLARA LAND TRUST

- 81. Santa Clara Land Trust realleges and incorporates paragraphs 1 through 4, paragraph 5b, paragraphs 6 through 37, paragraph 39, paragraphs 42 through 47, paragraphs 49 through 50, and paragraphs 52 through 59 as if set forth fully herein.
- 82. Santa Clara Land Trust asserts that it owns the Santa Clara Property fee simple absolute shown on Exhibit B-3, that the Private Real Property enjoys lot of record status with an allocated density of at least one (1) home site, and that no County Government or other government agent has the lawful right to enter or build upon Property Owner's Private Real Property without Property Owner's consent, without a judicial warrant, or without a specific, constitutional federal, or state statutory basis for doing so.
- 83. It is the County Government's position that Property Owner does not possess such rights and that the County Government's agents are authorized to enter and build upon Property Owner's Private Real Property without Property Owner's consent, without a judicial warrant, and without a specific, constitutional federal, or state statutory basis for doing so.
- 84. County Government has not afforded the Santa Clara Land Trust due process or just compensation for denying the lot of record and density requests, and given

this land would be deemed already vacated by operation of section 177.101(5), Florida Statutes, if the County had such rights, the County Government's failure to provide the lot of record and density acknowledgements is arbitrary and capricious and violates the private property rights of the Santa Clara Land Trust.

85. The County Government has meaningfully interfered with Santa Clara Land Trust's possessory interest by denying lot of record and density status for the Santa Clara Property, causing Santa Clara Land Trust to suffer damages.
86. The above acts were committed under color of state law and intentionally deprived Santa Clara Land Trust of the use or enjoyment of its property secured by the United States Constitution and the Fourth and Fifth Amendments and Section 42 USC §1983.
87. The County Government acted intentionally, deliberately, knowingly and without reasonable justification.
88. As a result, Santa Clara Land Trust has suffered damages and will continue to suffer damages to its property.

WHEREFORE, Santa Clara Land Trust respectfully requests that this Court enter a judgment against Defendant as a result of its unlawful action in violation of the Fourth Amendment of the United States Constitution and for damages, interest, costs, and attorneys' fees pursuant to 42 USC §1988.

COUNT V
VIOLATION OF FLORIDA CONSTITUTION AS TO SANTA CLARA
LAND TRUST

89. Santa Clara Land Trust realleges and incorporates paragraphs 1 through 4, paragraph 5b, paragraphs 6 through 37, paragraph 39, paragraphs 42 through 47, paragraphs 49 through 50, and paragraphs 52 through 59 as if set forth fully herein. The County Government's actions constitute an unlawful taking of property without payment of full compensation in violation of Article X, Section 6(a) Florida Constitution.
90. This claim is ripe for adjudication.
91. The property rights and interests that Santa Clara Land Trust lost because of the County Government's actions are fundamental and inherent in its property ownership and rights.
92. County Government has not afforded Private Property Owner due process or just compensation for denying the lot of record and density requests, and given this land would be deemed already vacated by operation of section 177.101(5), Florida Statutes, if the County had any such rights, the County Government's failure to provide the lot of record and density acknowledgements is arbitrary and capricious and violates the private property rights of Santa Clara Land Trust.
93. The County Government continues to deny lot of record and density requests for the Santa Clara Property causing Santa Clara Land Trust to suffer damages.

94. The County Government's actions constitute a taking of Santa Clara Land Trust's property in violation of Article I, Section 9 and Article X, Section 6(a) of the Florida Constitution.

WHEREFORE, Santa Clara Land Trust respectfully requests that this Court enter a judgment against Defendant as a result of its actions in violation of the Florida Constitution, that the County's conduct amounted to a taking of the Santa Clara Land Trust's property and for damages, interest, costs and attorneys' fees allowed by law.

COUNT VI

QUIET TITLE AS TO SANTA CLARA LAND TRUST

95. Santa Clara Land Trust realleges and incorporates paragraphs 1 through 4, paragraph 5b, paragraphs 6 through 37, paragraph 39, paragraphs 42 through 47, paragraphs 49 through 50, and paragraphs 52 through 59 as if set forth fully herein. The County Government claims an interest and estate adverse to Santa Clara Land Trust's title in the Santa Clara Property and these claims constitute a cloud on Santa Clara Land Trust's title to the Santa Clara Property.

96. The claim of County Government is without any right whatsoever, and County Government has no right, estate, title, lien or interest in or to the Santa Clara Property or any part of the property owned by Santa Clara Land Trust.

WHEREFORE, Santa Clara Land Trust respectfully requests that this Court enter a judgment:

- a. Quieting title to such property and determining that the Property Owner, or its successors-in-interest, are the exclusive fee-simple absolute owner;
- b. awarding damages, if appropriate;

- c. awarding attorney's fees and costs incurred in this action; and
- d. awarding any and all other relief this Court may deem appropriate.

COUNT VII

**VIOLATION OF FOURTH AND FIFTH AMENDMENTS OF US CONSTITUTION AS TO
COASTAL RESOURCES LAND TRUST NO. 1**

- 97. Coastal Resources Land Trust No. 1 realleges and incorporates paragraphs 1 through 4, paragraph 5c, paragraphs 6 through 36, paragraph 40, paragraphs 42 through 47, paragraphs 52 through 59 as if set forth fully herein.
- 98. Coastal Resources Land Trust No. 1 asserts that it owns the Coastal Resources #1 Property in fee simple absolute of the property shown on Exhibit B-4, that the Private Real Property enjoys lot of record status with an allocated density of at least one (1) home site, and that no County Government or other government agent has the lawful right to enter or build upon Property Owner's Private Real Property without Property Owner's consent, without a judicial warrant, or without a specific, constitutional federal, or state statutory basis for doing so.
- 99. It is the County Government's position that Coastal Resources Land Trust No. 1 does not possess such rights and that the County Government's agents are authorized to enter and build upon Property Owner's Private Real Property without Property Owner's consent, without a judicial warrant, and without a specific, constitutional federal, or state statutory basis for doing so.
- 100. County Government has not afforded the Coastal Resources Land Trust No. 1 due process or just compensation for denying the lot of record and density requests, and given this land would be deemed already vacated by operation of section

177.101(5), Florida Statutes, if the County had such rights, the County Government's failure to provide the lot of record and density acknowledgements is arbitrary and capricious and violates the private property rights of Property Owner.

101. The County Government has meaningfully interfered with Coastal Resources Land Trust No. 1's possessory interest by denying lot of record and density status for the Coastal Resources #1 Property, causing Coastal Resources Land Trust No. 1 to suffer damages.
102. The above acts were committed under color of state law and intentionally deprived Coastal Resources Land Trust No. 1 of the use or enjoyment of its property secured by the United States Constitution and the Fourth and Fifth Amendments and Section 42 USC §1983.
103. The County Government acted intentionally, deliberately, knowingly and without reasonable justification.
104. As a result, Coastal Resources Land Trust No. 1 has suffered damages and will continue to suffer damages to its property.

WHEREFORE, Coastal Resources Land Trust No. 1 respectfully requests that this Court enter a judgment against Defendant as a result of its unlawful actions in violation of the Fourth Amendment of the United States Constitution and for damages, interest, costs, and attorneys' fees pursuant to 42 USC §1988.

COUNT VIII
VIOLATION OF FLORIDA CONSTITUTION AS TO COASTAL RESOURCES LAND TRUST NO. 1

105. Coastal Resources Land Trust No. 1 realleges and incorporates paragraphs 1 through 4, paragraph 5c, paragraphs 6 through 36, paragraph 40, paragraphs 42 through 47, paragraphs 52 through 59 as if set forth fully herein.
106. The County Government's actions constitute an unlawful taking of property without payment of full compensation in violation of Article X, Section 6(a) Florida Constitution.
107. This claim is ripe for adjudication.
108. The property rights and interests that Coastal Resources Land Trust No. 1 lost because of the County Government's actions are fundamental and inherent in its property ownership and rights.
109. County Government has not afforded Coastal Resources Land Trust No. 1 due process or just compensation for denying the lot of record and density requests, and given this land would be deemed already vacated by operation of section 177.101(5), Florida Statutes, if the County had any such rights, the County Government's failure to provide the lot of record and density acknowledgements is arbitrary and capricious and violates the private property rights of Coastal Resources Land Trust No. 1.
110. The County Government continues to deny lot of record and density requests for the Coastal Resources # 1 Property causing Coastal Resources Land Trust No. 1 to suffer damages.

111. The County Government's actions constitute a taking of Coastal Resources Land Trust No. 1's property in violation of Article I, Section 9 and Article X, Section 6(a) of the Florida Constitution.

WHEREFORE, Coastal Resources Land Trust No. 1 respectfully requests that this Court enter a judgment against Defendant as a result of its actions in violation of the Florida Constitution, that the County's conduct amounted to a taking of the Coastal Resources Land Trust No. 1's property and for damages, interest, costs and attorneys' fees allowed by law.

COUNT IX

QUIET TITLE AS TO COASTAL RESOURCES LAND TRUST NO. 1

112. Coastal Resources Land Trust No. 1 realleges and incorporates paragraphs 1 through 4, paragraph 5c, paragraphs 6 through 36, paragraph 40, paragraphs 42 through 47, paragraphs 52 through 59 as if set forth fully herein.

113. The County Government claims an interest and estate adverse to Coastal Resources Land Trust No. 1's title in the Coastal Resources #1 Property and these claims constitute a cloud on Coastal Resources Land Trust No. 1's title to the Coastal Resources #1 Property.

114. The claim of County Government is without any right whatsoever, and County Government has no right, estate, title, lien or interest in or to the Coastal Resources #1 Property or any part of the property owned by Coastal Resources Land Trust No. 1.

WHEREFORE, Coastal Resources Land Trust No. 1 respectfully requests that this Court enter a judgment:

- e. Quieting title to such property and determining that the Property Owner, or its successors-in-interest, are the exclusive fee-simple absolute owner;
- f. awarding damages, if appropriate;
- g. awarding attorney's fees and costs incurred in this action; and
- h. awarding any and all other relief this Court may deem appropriate.

COUNT X

**VIOLATION OF FOURTH AND FIFTH AMENDMENTS OF US CONSTITUTION AS TO
COASTAL RESOURCES LAND TRUST NO. 5**

- 115. Property Owner Coastal Resources Land Trust No. 5 realleges and incorporates paragraphs 1 through 4, paragraph 5d, paragraphs 6 through 36, paragraphs 41 through 47, and paragraphs 49 through 59 as if set forth fully herein.
- 116. In 1993 the County Attorney, George Ralph Miller, testified in Court that the County had not accepted any of the land in the Remnant Strip, which runs through Coastal Resources #5 Property shown on Exhibits B-5, B-6, and C-1, C-2 and C-3, for road purposes through non-user, and otherwise admitting that any land shown as roads on the GSM Depiction which were unbuilt and unused had not been accepted by the County.
- 117. Any use by the County Government of any portion of the Coastal Resources #5 Property used as a beach, beach access, or beach amenity or parking lot and as shown on Exhibits C-1, C-2 and C-3 was under an implied license revocable at will by Property Owner, and not inconsistent with the use by the Property Owner, nor adverse to or exclusive of Property Owner, and at all times Property Owner is deemed in possession of its Coastal Resources #5 Property.

118. The Property Owner has never acquiesced to any use of the Coastal Resources #5 Property by the County Government, and any use by the County Government of any portion of this remnant land used as a beach, beach access, or beach amenity parking lot was not exclusive of nor inconsistent with the use of the Property Owner.
119. No portion of the Coastal Resources #5 Property has been fenced or otherwise used exclusively by the County Government, and County Government has not filed any form with the Walton Tax Appraiser claiming title by adverse possession to any of the remnant land pursuant to section 95.18 (3), Florida Statutes.
120. The County Government has no color of title to any portion of the Coastal Resources #5 Property, and the County Government has not made any exclusive use of any such remnant land for any statutory or prescriptive easement periods.
121. The doctrines of admissions against interest, non-user, laches, and estoppel bar any claim by the County Government to any Coastal Resources #5 Property.
122. Property Owner Coastal Resources Land Trust No. 5 asserts that it owns the Private Real Property fee simple absolute, that the Private Real Property enjoys lot of record status over all of its remnant property tracts shown on Exhibits B-5, B-6, B-7 (that portion surveyed lying outside the limits of the existing street), and B-8, and C-1, C-2A and B, C-3 and C-4, and that no County Government or other government agent has the lawful right to enter or build upon the Coastal Resources #5 Property without Property Owner's consent, without a judicial warrant, or without a specific, constitutional federal, or state statutory basis for doing so.

123. It is the County Government's position that Property Owner does not possess such rights and that the County Government's agents are authorized to enter and build upon Property Owner's Private Real Property without Property Owner's consent, without a judicial warrant, and without a specific, constitutional federal, or state statutory basis for doing so.
124. The County Government has made no official acceptance of any proposed road that is unbuilt as a road in GSM, or other remnant land of Property Owner, including the Remnant Strip, and conversely has expressly denied such acceptance and disclaimed any rights of the County or public to such land by non-user, by the County Resolutions of 1974 and 1978, by sworn testimony of the County Attorney in 1993, and by approving or acquiescing to replats and roads built by others inconsistent with the Depiction, including the State of Florida and private developers. The County Government's use of Private Property Owner's land has not been exclusive, continuous, or uninterrupted for any statutory period.
125. The County Government's use of Private Property Owner's remnant land has always been consistent with the use of Property Owner.
126. County Government has not afforded Private Property Owner due process or paid just compensation as required by the Fifth and Fourteenth Amendments to the United States Constitution and under Article X of the Florida Constitution, and by denying the lot of record and density requests, and given this land would be deemed vacated and, if applicable, would enjoy lot of record status by operation of section 177.101(5), Florida Statutes, if the County had such rights, and by the Comprehensive Land Use Code, the County Government's failure to provide the

lot of record and density acknowledgements is arbitrary and capricious and violates the private property rights of Property Owner.

127. County Government has profited off the use of Property Owner's remnant land in ways including permitting beach vending on the Coastal Resources #5 Property, by collecting taxes on homes built, by gaining beach nourishment credits for creating parking beach access parking spaces as high as \$700,000 for thirty-five parking spaces alone in one year, and on replatted lots over the Remnant Strip and other Coastal Resources #5 Property for property shown on Exhibits C-1 through C-4.
128. In the alternative, Property Owner waives its claim for inverse condemnation by tort for land wrongfully taken by the County Government for parking lots and amenity areas built on Property Owner's land shown on Exhibits C-1 through C-4, which despite the County Government's vested power of eminent domain has taken Property Owner's property without just compensation, and Property Owner elects alternatively to eject the County Government from its land or to otherwise proceed in equity to be compensated for its land taken wrongfully and without just compensation by the County Government.
129. The County Government has meaningfully interfered with Coastal Resources Land Trust No. 5's possessory interest by denying lot of record and density status for the Coastal Resources #5 Property shown on Exhibits B-5, B-6, B-7 (that portion surveyed lying outside the limits of the existing street) and B-8, and C-1 through C-4, causing Coastal Resources Land Trust No. 5 to suffer damages.

130. The above acts were committed under color of state law and intentionally deprived Coastal Resources Land Trust No. 5 of the use or enjoyment of its property secured by the United States Constitution and the Fourth and Fifth Amendments and Section 42 USC §1983.
131. The County Government acted intentionally, deliberately, knowingly and without reasonable justification.
132. As a result, Coastal Resources Land Trust No. 5 has suffered damages and will continue to suffer damages to its property.

WHEREFORE, Coastal Resources Land Trust No. 5 respectfully requests that this Court enter a judgment against Defendant as a result of its unlawful actions in violation of the Fourth Amendment of the United States Constitution and for damages, interest, costs, and attorneys' fees pursuant to 42 USC §1988.

COUNT XI

VIOLATION OF FLORIDA CONSTITUTION AS TO COASTAL RESOURCES LAND TRUST NO. 5

133. Property Owner Coastal Resources Land Trust No. 5 realleges and incorporates paragraphs 1 through 4, paragraph 5d, paragraphs 6 through 36, paragraphs 41 through 47, and paragraphs 49 through 59 as if set forth fully herein. The County Government's actions constitute an unlawful taking of property without payment of full compensation in violation of Article X, Section 6(a) Florida Constitution.
134. This claim is ripe for adjudication.

135. The property rights and interests that Coastal Resources Land Trust No. 5 lost because of the County Government's actions are fundamental and inherent in its property ownership and rights.
136. County Government has not afforded Private Property Owner due process or just compensation for denying the lot of record and density requests for land shown on the following Exhibits B-5, B-6, B-7 (that portion surveyed lying outside the limits of the existing street) and B-8 , and given this land would be deemed already vacated by operation of section 177.101(5), Florida Statutes, if the County had any such rights, the County Government's failure to provide the lot of record and density acknowledgements is arbitrary and capricious and violates the private property rights of Coastal Resources Land Trust No. 5.
137. The County Government continues to deny lot of record and density requests for the Coastal Resources # 5 Property causing Coastal Resources Land Trust No. 5 to suffer damages.
138. The County Government's actions constitute a taking of Coastal Resources Land Trust No. 5's property in violation of Article I, Section 9 and Article X, Section 6(a) of the Florida Constitution.

WHEREFORE, Coastal Resources Land Trust No. 5 respectfully requests that this Court enter a judgment against Defendant as a result of its actions in violation of the Florida Constitution, that the County's conduct amounted to a taking of the Coastal Resources Land Trust No. 5's property and for damages, interest, costs and attorneys' fees allowed by law.

COUNT XII

QUIET TITLE AS TO COASTAL RESOURCES LAND TRUST NO. 5

139. Coastal Resources Land Trust No. 5 realleges and incorporates paragraphs 1 through 4, paragraph 5d, paragraphs 6 through 36, paragraphs 41 through 47, and paragraphs 49 through 59 as if set forth fully herein. The County Government claims an interest and estate adverse to Coastal Resources Land Trust No. 5's title in the Coastal Resources #5 Property and these claims constitute a cloud on Coastal Resources Land Trust No. 5's title to the Coastal Resources #5 Property.
140. The claim of County Government is without any right whatsoever, and County Government has no right, estate, title, lien or interest in or to the Coastal Resources #5 Property or any part of the property owned by Coastal Resources Land Trust No. 5.

WHEREFORE, Coastal Resources Land Trust No. 5 respectfully requests that this Court enter a judgment:

- i. Quieting title to such property and determining that the Property Owner, or its successors-in-interest, are the exclusive fee-simple absolute owner;
- j. awarding damages, if appropriate;
- k. awarding attorney's fees and costs incurred in this action; and
- l. awarding any and all other relief this Court may deem appropriate.

Dated this 18th day of November 2019.

/s/ A. Benjamin Gordon
A. Benjamin Gordon
Florida Bar No.: 528617
Andrea Ansley

Florida Bar No.: 0680516
AnchorsGordon, P.A.
2113 Lewis Turner Boulevard, Suite 100
Ft. Walton Beach, FL 32547
Telephone: (850) 863-1974
Facsimile: (850) 863-1591
Email: bgordon@anchorsgordon.com
anansley@anchorsgordon.com
Secondary: cyndi@anchorsgordon.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was filed this 18th day of November, 2019 via the Florida Court's E-Filing portal, which will send notice to counsel of record for Defendant, William G. Warner, Warner Law Firm, P.A., to pleadings@warnerlaw.us.

/s/ A. Benjamin Gordon

A. Benjamin Gordon

Florida Bar No.: 528617

Andrea Ansley

Florida Bar No.: 0680516

AnchorsGordon, P.A.

2113 Lewis Turner Boulevard, Suite 100

Ft. Walton Beach, FL 32547

Telephone: (850) 863-1974

Facsimile: (850) 863-1591

Email: bgordon@anchorsgordon.com

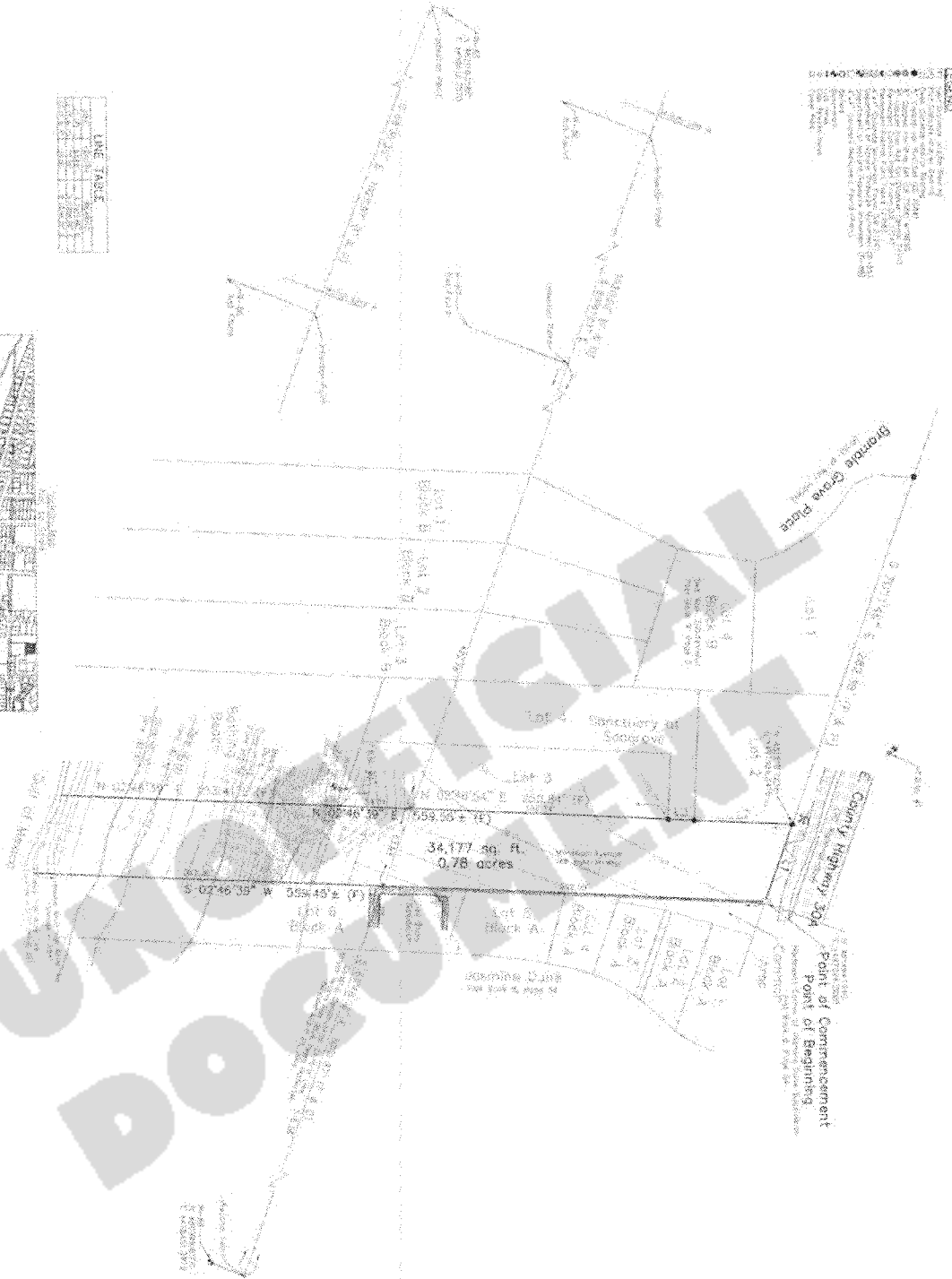
anansley@anchorsgordon.com

Secondary: cyndi@anchorsgordon.com

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LINE TABLE

LINE NO.	BEARING	DISTANCE
1	N 88° 48' 52" E	153.66 ± (4)
2	S 02° 46' 37" W	359.45 ± (7)



34,177 sq. ft.
 0.78 acres

Point of Beginning
 County Highway 304

Signature
 [Illegible Name]



EXHIBIT
 B-1

STATE CASE REPORT

This report was prepared for the use of the client and is not to be construed as a warranty of accuracy or as a representation of the surveyor's liability. The surveyor's liability is limited by the terms of the contract and the laws of the state.

LEGAL DESCRIPTION

The following is a legal description of the property surveyed and shown on the attached plan. It is to be read in conjunction with the survey data and the map.

A. BOUNDARY & MEAN HIGH WATER LINE SURVEY

Section 23, Township 3 South, Range 19 West, Walton County, Florida

Voelker Surveying

110 Lagoon Lane, Suite 4
 Panama City, FL 32361
 Phone: 904.233.3878 Fax: 904.231.6756

State Road Beach
 Panama City, FL 32361

DATE	04/09/2019
DRAWN BY	AL
CHECKED BY	AL
DATE	04/09/2019
DRAWN BY	AL
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DATE	04/09/2019
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SURVEYOR'S REPORT:

FLORIDA FLOOD INSURANCE RATE MAP NO. 12131C0203 G, DATED SEPTEMBER 24, 2010 INDICATES THAT THIS PROPERTY IS LOCATED IN "ZONE A", FLOOD ZONE(S) SCALED FROM THE APPROVED FLOOD INSURANCE RATE MAP.

THIS SURVEY WAS PREPARED FOR THE CLIENTS USE AND PURPOSE AS SHOWN. USUALLY FOR ANY OTHER PURPOSE SUBSCRIPTIONS (AS WHOLE OR IN PART) SHALL NOT BE MADE WITHOUT THE EXPLICIT WRITTEN PERMISSION OF THE SURVEYOR.

THE RELATIVE ERROR OF CLOSURE OF THIS SURVEY & PLAT IS WITHIN THE ALLOWABLE TOLERANCE FOR SUBURBAN SURVEYS ("IN 7500") ACCORDING TO THE MINIMUM TECHNICAL STANDARDS FOR SURVEYS IN THE STATE OF FLORIDA.

NO ATTEMPT HAS BEEN MADE BY VOELKER SURVEYING TO VERIFY TITLE, ACTUAL LEGAL OWNERSHIPS, ZONE RESTRICTIONS, EASEMENTS, OR OTHER BURDENS ON THE PROPERTY OTHER THAN THAT FURNISHED BY THE CLIENT OR HIS REPRESENTATIVE.

NOTICE: THERE MAY BE ADDITIONAL RESTRICTIONS THAT ARE NOT RECORDED ON THIS SURVEY THAT MAY BE FOUND IN THE PUBLIC RECORDS OF THE COUNTY. PROPERTY IS SUBJECT TO ZONING ORDINANCES AND RESTRICTIONS OF NEIGHBORS.

UTILITIES, BOTH OVERHEAD AND UNDERGROUND SHOWN, HAVE BEEN LOCATED FROM VISIBLE UTILITY FEATURES AND PREVIOUS CONSTRUCTION DRAWINGS. THE SURVEYOR MAKES NO GUARANTEE THAT THE UNDERGROUND UTILITIES SHOWN COMPRISE ALL SUCH UTILITIES IN THE AREA, EITHER IN SERVICE OR ABANDONED. THE SURVEYOR MAKES NO WARRANTY THAT THE UNDERGROUND UTILITIES SHOWN ARE IN SERVICE, EXCEPT FOR ABOVE GROUND VISIBLE UTILITY FEATURES.

THIS COMPANY AND ITS EMPLOYEES HAVE MADE NO ATTEMPT TO PHYSICALLY LOCATE UNDERGROUND FEATURES, SUCH AS FOOTINGS AND OTHER UNDERGROUND IMPROVEMENTS.

ADDITIONS OR DELETIONS TO SURVEY MARKS OR MONUMENTS BY OTHER THAN THE BOUNDING PARTY OR PARTIES IS PROHIBITED WITHOUT WRITTEN CONSENT OF THE BOUNDING PARTY OR PARTIES.

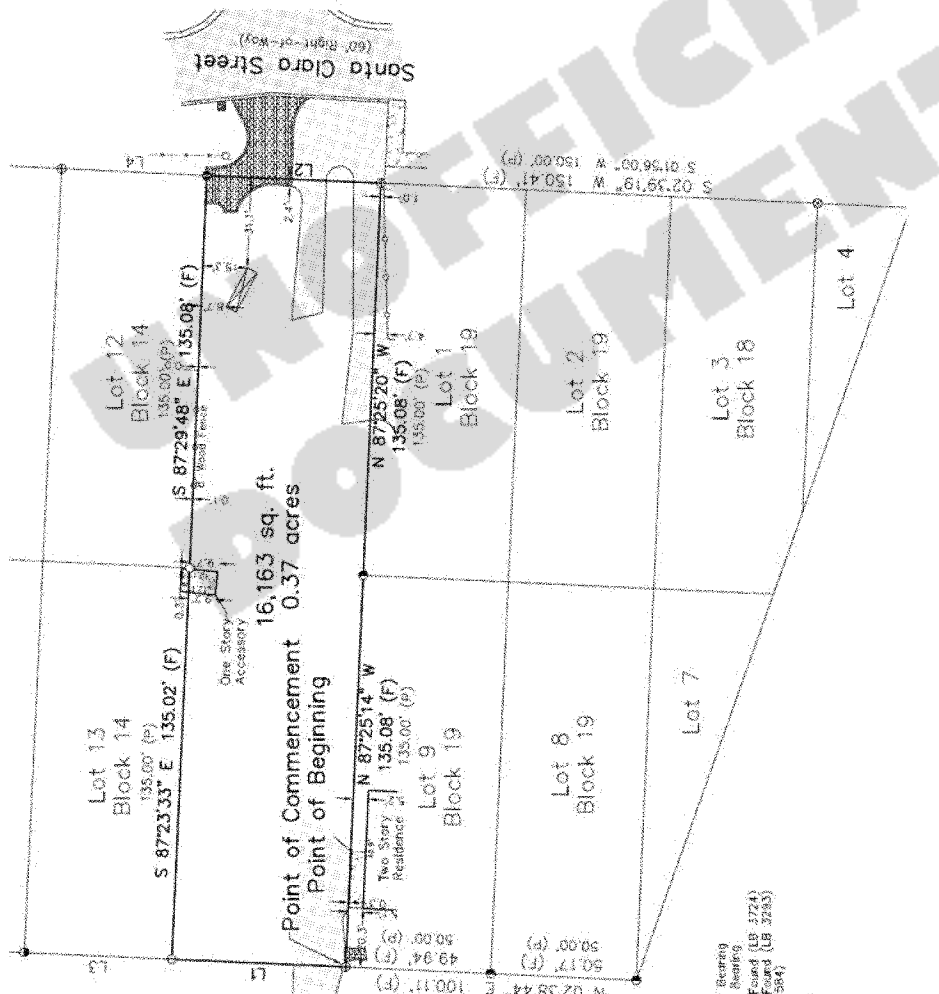
ALL TIES TO PUBLIC LAND SURVEY SYSTEM MONUMENTS ARE PROHIBITED, UNLESS OTHERWISE NOTED.

BEARINGS BASED ON THE WEST LINE OF SUBURBAN, BEING N 02°29'19" E.

ALL ELEVATIONS ARE BASED ON NORTH AMERICAN VERTICAL DATUM (1988), NATIONAL GEODETIC SURVEY. GEODATUM CONTROL POINT (NAD 83) (NAD 83) CONTROL POINT, ELEVATION = 23.89'. TBM #2, PERMANENT CONTROL POINT (1988), ELEVATION = 26.14.

REFERENCE MAPS:
1. PLAT OF GULF SHORE MANOR, DATED JULY 1925.

LEGAL DESCRIPTION:
COMMENCE AT A 1/2" IRON ROD, SAID POINT BEING THE NORTHWEST CORNER OF LOT 9, BLOCK 19, GULF SHORE MANOR, SAID POINT ALSO BEING THE POINT OF BEGINNING, THENCE NORTH 12°15'00" WEST 135.00' TO A 1/2" IRON ROD, SAID POINT BEING THE POINT OF BEGINNING, THENCE SOUTH 87°29'48" EAST, A DISTANCE OF 135.08 FEET TO A 1" IRON PIPE, THENCE SOUTH 87°29'48" EAST, A DISTANCE OF 135.08 FEET TO A BRASS CORK (LB 2584), THENCE SOUTH 02°28'05" WEST, A DISTANCE OF 59.98 FEET TO A 1/2" IRON ROD, THENCE NORTH 87°22'14" WEST, A DISTANCE OF 135.08 FEET TO A 1/2" CAPPED IRON ROD (LB 3724), THENCE NORTH 87°22'14" WEST, A DISTANCE OF 135.08 FEET TO THE POINT OF BEGINNING.



- LEGEND**
- (F) Field Distance and/or Bearing
 - (P) Plat Distance and/or Bearing
 - X* Capped Iron Rod Found (LB 3724)
 - * Capped Iron Rod Found (LB 2283)
 - * Brass Disk Set (LB 2584)
 - * 1/2" Iron Rod Found
 - * 1/2" Iron Pipe Found
 - * 1" Iron Pipe Found
 - * 1" Mail Box Pipe Found
 - * Power Pole
 - * Overhead Electric
 - * Asphalt Pavement
 - * Concrete Pavement
 - * Brick/Unrestored Brick

LINE	LENGTH	BEARING
11 (P)	59.98	N 02°28'05" W
12 (F)	135.08	S 87°29'48" E
13 (F)	135.00	N 12°15'00" W
14 (F)	59.97	S 87°22'14" W
15 (F)	135.08	N 87°22'14" E
16 (F)	135.08	S 87°22'14" W
17 (F)	135.08	N 87°22'14" E

Voelker Surveying
110 Logan Lane, Suite 4
Sandy Ridge Beach, Florida 32459

Phone: 850.231.6300
Fax: 850.231.6395

web: voelkersurveying.com

LI 7584
web: voelkersurveying.com

A BOUNDARY SURVEY
FOR
COASTAL RESOURCES 5 LAND TRUST

Section 14, Township 3 South, Range 19 West, Walton County, Florida

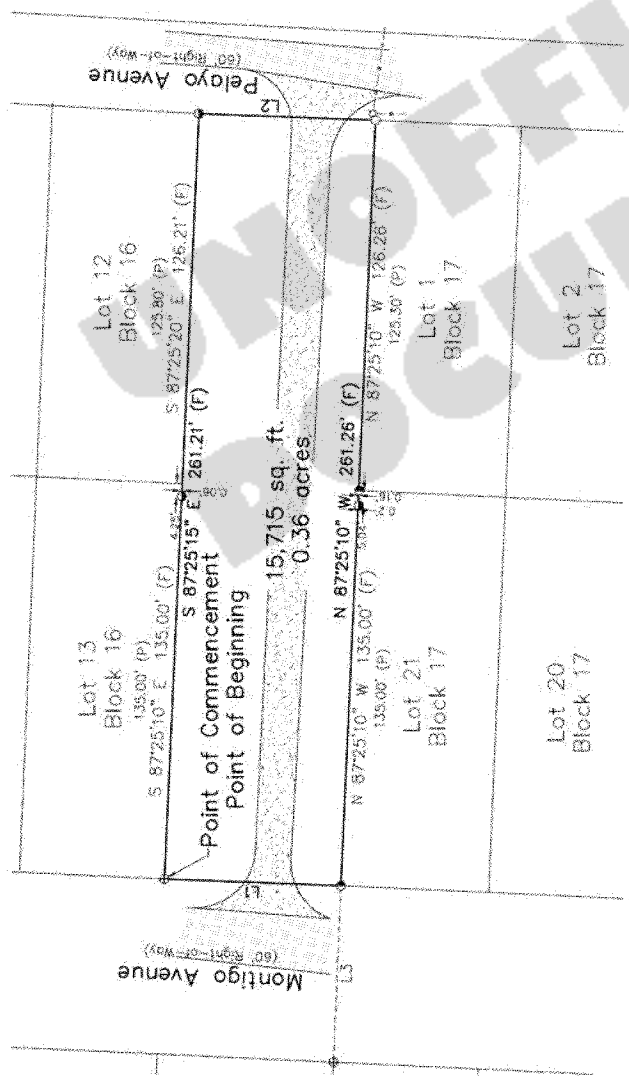
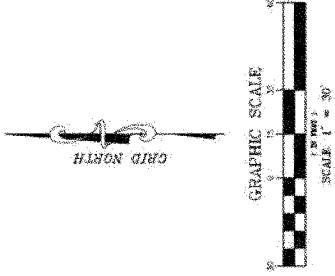
Job #: 9932 Field Date: 12 Jan 18 Drawn By: CMB Approved By: RV
Scale: 1" = 30' Date: 15 January 2018 Field Book: 497 Sheet 1 of 1

Voelker Surveying
110 Logan Lane, Suite 4
Sandy Ridge Beach, Florida 32459

Phone: 850.231.6300
Fax: 850.231.6395

web: voelkersurveying.com

LI 7584
web: voelkersurveying.com



SURVEYOR'S REPORT:

F.L.V.A. FLOOD INSURANCE RATE MAP NO. 131510073 G, DATED SEPTEMBER 29, 2010 INDICATES THAT THIS PROPERTY IS LOCATED IN "ZONE A", FLOOD ZONE(S) SCALED FROM THE APPROPRIATED FLOOD INSURANCE RATE MAP.

THIS SURVEY WAS PREPARED FOR THE CLIENT'S USE AND PURPOSE AS SHOWN, USAGE FOR ANY OTHER PURPOSE, REPRODUCTION (IN WHOLE OR IN PART) SHALL NOT BE MADE WITHOUT THE EXPLICIT WRITTEN PERMISSION OF THE SURVEYOR.

THE RELATIVE ERROR OF CLOSURE OF THIS SURVEY & PLAT IS WITHIN THE ALLOWABLE TOLERANCE FOR SURVEYING SURVEYS ("IN 2007) ACCORDING TO THE MINIMUM TECHNICAL STANDARDS FOR SURVEYING IN THE STATE OF FLORIDA.

NO ATTEMPT HAS BEEN MADE BY ME/WE/SUBJECT TO VERIFY TITLE, ACTUAL LEGAL OWNERSHIP(S)/DEED RESTRICTIONS, EASEMENTS, OR OTHER BURDENS ON THE PROPERTY OTHER THAN THAT FURNISHED BY THE CLIENT OR HIS REPRESENTATIVE.

NOTICE: THERE MAY BE ADDITIONAL RESTRICTIONS THAT ARE NOT RECORDED ON THIS SURVEY THAT MAY BE FOUND IN THE PUBLIC RECORDS OF THE COUNTY. PROPERTY IS SUBJECT TO ZONING SETBACKS AND RESTRICTIONS OF RECORD.

UTILITIES, BOTH OVERHEAD AND UNDERGROUND SHOWN, HAVE BEEN LOCATED FROM WIRELESS UTILITY FEATURES, AND PREVIOUS CONSTRUCTION DRAWINGS. THE SURVEYOR MAKES NO GUARANTEE THAT THE UNDERGROUND UTILITIES SHOWN, COMPRISE ALL SUCH UTILITIES IN THE AREA, EITHER IN SERVICE OR AS ABANDONED. THE SURVEYOR FURTHER DOES NOT WARRANT THAT THE UNDERGROUND UTILITIES SHOWN ARE IN SERVICE, OR THAT THE UTILITIES SHOWN ARE NOT SUBJECT TO ANY OTHER RESTRICTIONS OR SPECIALTY LOCATED UTILITIES, EXCEPT FOR ABOVE SHOWN VISIBLE UTILITY FEATURES.

THIS COMPANY AND ITS EMPLOYEES HAVE MADE NO ATTEMPT TO PHYSICALLY LOCATE UNDERGROUND FEATURES, SUCH AS FOOTINGS AND OTHER UNDERGROUND IMPROVEMENTS.

ADDRESSES OR BELONGING TO SURVEY MAPS OR RECORDS BY OTHER THAN THE SPOUSAL PARTY OR PARTIES IS PROVIDED WITHOUT WRITTEN CONSENT OF THE SPOUSAL PARTY OR PARTIES.

ALL TIES TO PUBLIC LAND SURVEY SYSTEM MONUMENTS ARE PROVIDED, UNLESS OTHERWISE NOTED.

BEARINGS BASED ON THE WEST USE OF SUBMERISION, BEING N 23W02' E.

REFERENCE MAPS:
 1. PLAT OF GULF SHORE MANOR, DATED JULY 1925

LEGAL DESCRIPTION:
 COMMENCE AT A 1/2" IRON ROD, SAID POINT BEING THE SOUTHWEST CORNER OF LOT 13, BLOCK 16, GULF SHORE MANOR, SAID POINT ALSO BEING AT THE INTERSECTION OF THE EAST RIGHT-OF-WAY OF PELAYO AVENUE AND THE WEST RIGHT-OF-WAY OF MONTIGO AVENUE, BEARING S 87°25'10" W 135.00' (P) TO A 1/2" IRON ROD, BEING THE SOUTH 1/2 CORNER OF LOT 13, BLOCK 16, GULF SHORE MANOR, SAID POINT ALSO BEING ON THE WEST RIGHT-OF-WAY OF PELAYO AVENUE, THENCE DEPARTING SAID WEST RIGHT-OF-WAY OF PELAYO AVENUE AND ALONG THE SOUTH RIGHT-OF-WAY OF WILLOW STREET NORTH 87°25'10" WEST, DISTANCE 126.21' FEET TO A 1/2" IRON PIPE, THENCE ALONG SAID EAST RIGHT-OF-WAY, NORTH 26°10'11" EAST, A DISTANCE OF 60.15 FEET TO THE POINT OF BEGINNING.

LINE	LENGTH	BEARINGS
1-11	135.00'	N 135°00'00" E
1-12	126.21'	S 87°25'10" W
1-13	126.26'	N 87°25'10" W
1-14	126.26'	S 87°25'10" W
1-15	135.00'	N 135°00'00" E

- LEGEND**
- (F) Field Elevation and/or Bearings
 - (P) Plat Bearings and/or Bearings
 - 3" Capred Iron Rod Found (1469)
 - 3" Capred Iron Rod Found (2493)
 - Brass Disk Set (L.B. 7584)
 - Iron Rod Found
 - Iron Pipe Found
 - Power Pole
 - Portland Cement
 - DIRT
 - Gravel/Armstone

A BOUNDARY SURVEY

Section 14, Township 3 South, Range 19 West, Walton County, Florida

Job #: 9937	Field Date: 26 Jan '18	Drawn By: CWB	Approved By: RV
Scale: 1" = 30'	Date: 26 January 2018	Field book: 487	Sheet 1 of 1

Voelker Surveying

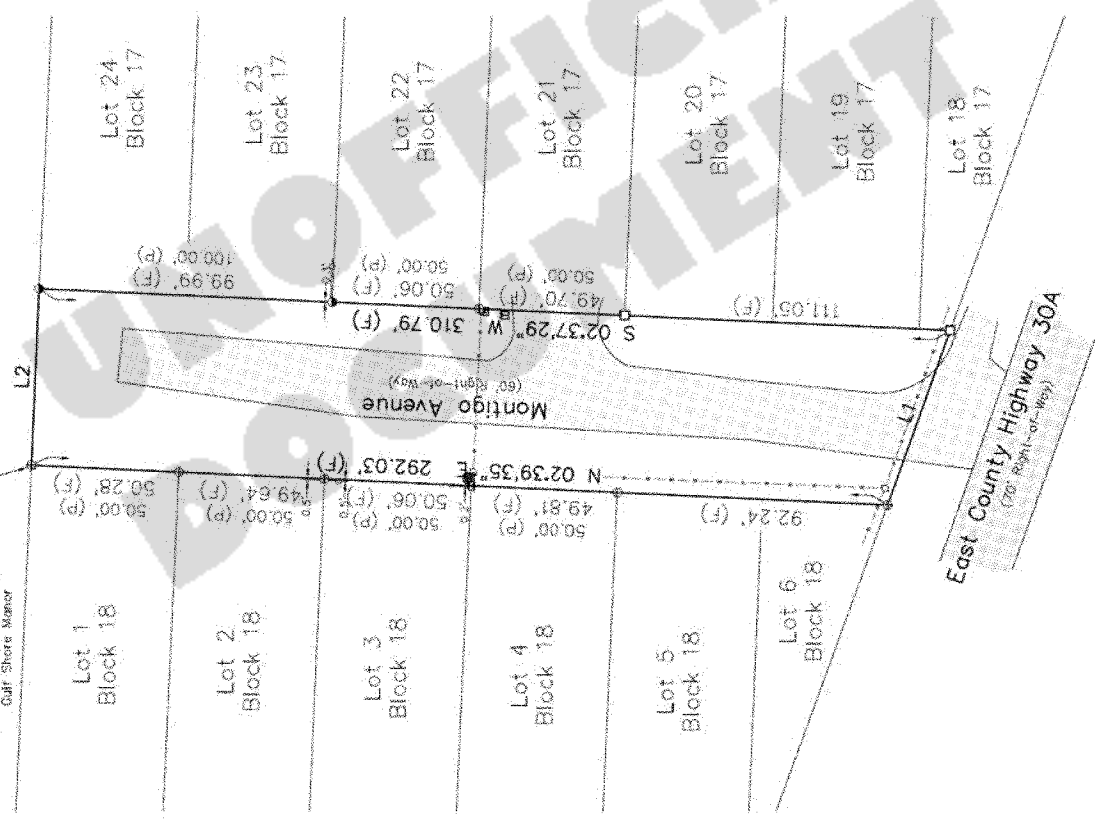
110 Logan Lane, Suite 4
 Santa Rosa Beach, Florida 32459

Phone: 850.231.6300 Fax: 850.231.6303
 Email: info@voelkersurveying.com Website: www.voelkersurveying.com

Survey Map & Report of
 Title and other information
 and a plat of land
 Surveyor & Register



Point of Commencement
Point of Beginning
Northeast Corner of Block 18
Gulf Shore Manor



- LEGEND**
- (F) Field Distance and/or Bearing
 - (P) Plot Distance and/or Bearing
 - 1/2" Capped Iron Rod Found (US 1489)
 - 3/4" Capped Iron Rod Found (Unknown)
 - 1" Iron Rod Found
 - 1" Concrete Monument Found (Plan)
 - 1" Scale Stake
 - 1" Metal Stake
 - Water Meter
 - Power Pole
 - Telephone Pedestal
 - Overhead Electric
 - Overhead Gas
 - Asphalt Paved
 - Gravel/Asphalt

LINE	LENGTH	BEARING
1	50.00 (P)	S 02°37'29" W
2	50.00 (P)	N 02°39'35" E
3	50.00 (P)	S 02°37'29" W
4	50.00 (P)	N 02°39'35" E
5	50.00 (P)	S 02°37'29" W
6	50.00 (P)	N 02°39'35" E

SURVEYOR'S REPORT:

FEWA FLOOD INSURANCE RATE MAP NO. 121316703 C, DATED SEPTEMBER 29, 2010 INDICATES THAT THIS PROPERTY IS LOCATED IN ZONE X-1 (FLOOD ZONE) SCALED FROM THE APPROPRIATE FLOOD INSURANCE RATE MAP.

THIS SURVEY WAS PREPARED FOR THE CLIENT'S USE AND PURPOSE AS SHOWN, UNLESS FOR ANY OTHER PURPOSE, REPAIRS (ON WHOLE OR IN PART) SHALL NOT BE MADE WITHOUT THE EXPLICIT WRITTEN PERMISSION OF THE SURVEYOR.

NO ATTEMPT HAS BEEN MADE BY VOLKMER SURVEYING TO VERIFY THE ACTUAL LEGAL DIMENSIONS, DEED RECORDS OR OTHER RECORDS ON THE PROPERTY OTHER THAN THAT FURNISHED BY THE CLIENT OR HIS REPRESENTATIVE.

NOTICE: THERE MAY BE ADDITIONAL RESTRICTIONS THAT ARE NOT RECORDED ON THIS SURVEY THAT MAY BE FOUND IN THE PUBLIC RECORDS OF THE COUNTY. PROPERTY IS SUBJECT TO ZONING, SETBACKS AND RESTRICTIONS OF RECORD.

UTILITIES, BOTH OVERHEAD AND UNDERGROUND, SHOWS HAVE BEEN LOCATED FROM VISIBLE UTILITY FEATURES AND DEEMED CONSTRUCTION OR MARKS. THE SURVEYOR MAKES NO GUARANTEE THAT THE UNDERGROUND UTILITIES SHOWN COMPRISE ALL SUCH UTILITIES IN THE AREA, EITHER IN SERVICE OR AS ABANDONED. THE SURVEYOR FURTHER DOES NOT WARRANT THAT THE UNDERGROUND UTILITIES SHOWN ARE IN THE EXACT LOCATIONS INDICATED. THE SURVEYOR HAS NOT PHYSICALLY LOCATED THE UNDERGROUND UTILITIES, EXCEPT FOR ABOVE-GROUND VISIBLE UTILITY FEATURES.

THIS COMPANY AND ITS EMPLOYEES HAVE MADE NO ATTEMPT TO PHYSICALLY LOCATE UNDERGROUND FEATURES, SUCH AS FOOTINGS AND OTHER UNDERGROUND IMPROVEMENTS.

ADDITIONS OR DELETIONS TO SURVEY MAPS OR REPORTS BY OTHER THAN THE SIGNING PARTY OR PARTIES IS PROHIBITED WITHOUT WRITTEN CONSENT OF THE SIGNING PARTY OR PARTIES.

ALL TIES TO PUBLIC LAND SURVEY SYSTEM MONUMENTS ARE REPORTED, UNLESS OTHERWISE NOTED.

BEARINGS BASED ON STATE PLANE COORDINATES, FLORIDA NORTH NORTH AMERICAN VERTICAL DATUM (1985). ALSO THE SOUTH LINE OF BLOCK 14, GULF SHORE MANOR, BEING S 87°24'05" E.

REFERENCE MAPS:
1. PLAT OF GULF SHORE MANOR, BY G.H. GRAY, DATED AUGUST 1923

LEGAL DESCRIPTION:

COMMENCE AT A 1/2" IRON ROD, SAID POINT BEING THE NORTHEAST CORNER OF BLOCK 18, GULF SHORE MANOR, BEING S 02°37'29" WEST, A DISTANCE OF 50.00 FEET TO A 1/2" CAPPED IRON ROD (1489), THENCE SOUTH 02°37'29" EAST, A DISTANCE OF 50.00 FEET TO A 1/2" CAPPED IRON ROD (1490), SAID POINT BEING THE NORTHEAST CORNER OF BLOCK 17, GULF SHORE MANOR, THENCE ALONG THE WEST LINE OF SAID BLOCK 17, SOUTH 02°37'29" WEST, A DISTANCE OF 50.00 FEET TO A 1/2" CONCRETE MONUMENT (PLAN), SAID POINT BEING ON THE WEST LINE OF SAID BLOCK 17, THENCE SOUTH 02°37'29" WEST, A DISTANCE OF 50.00 FEET TO A 1/2" CONCRETE MONUMENT (PLAN), SAID POINT BEING ON THE WEST LINE OF SAID BLOCK 17, THENCE SOUTH 02°37'29" WEST, A DISTANCE OF 50.00 FEET TO A 1/2" CONCRETE MONUMENT (PLAN), SAID POINT BEING AT THE INTERSECTION OF THE NORTH RIGHT-OF-WAY OF EAST COUNTY HIGHWAY 30A AND THE EAST LINE OF BLOCK 18, THENCE DEPARTING SAID NORTH RIGHT-OF-WAY AND ALONG THE EAST LINE OF BLOCK 18, NORTH 02°39'35" EAST, A DISTANCE OF 292.03 FEET TO THE POINT OF BEGINNING.

A BOUNDARY SURVEY

Section 23, Township 3 South, Range 19 West, Walton County, Florida	Job #: 10107	Field Date: 26 Mar 18	Drawn By: CWS	Approved By: RV
	Scale: 1" = 30'	Date: 22 May 2018	Field book: 511	Sheet 1 of 1

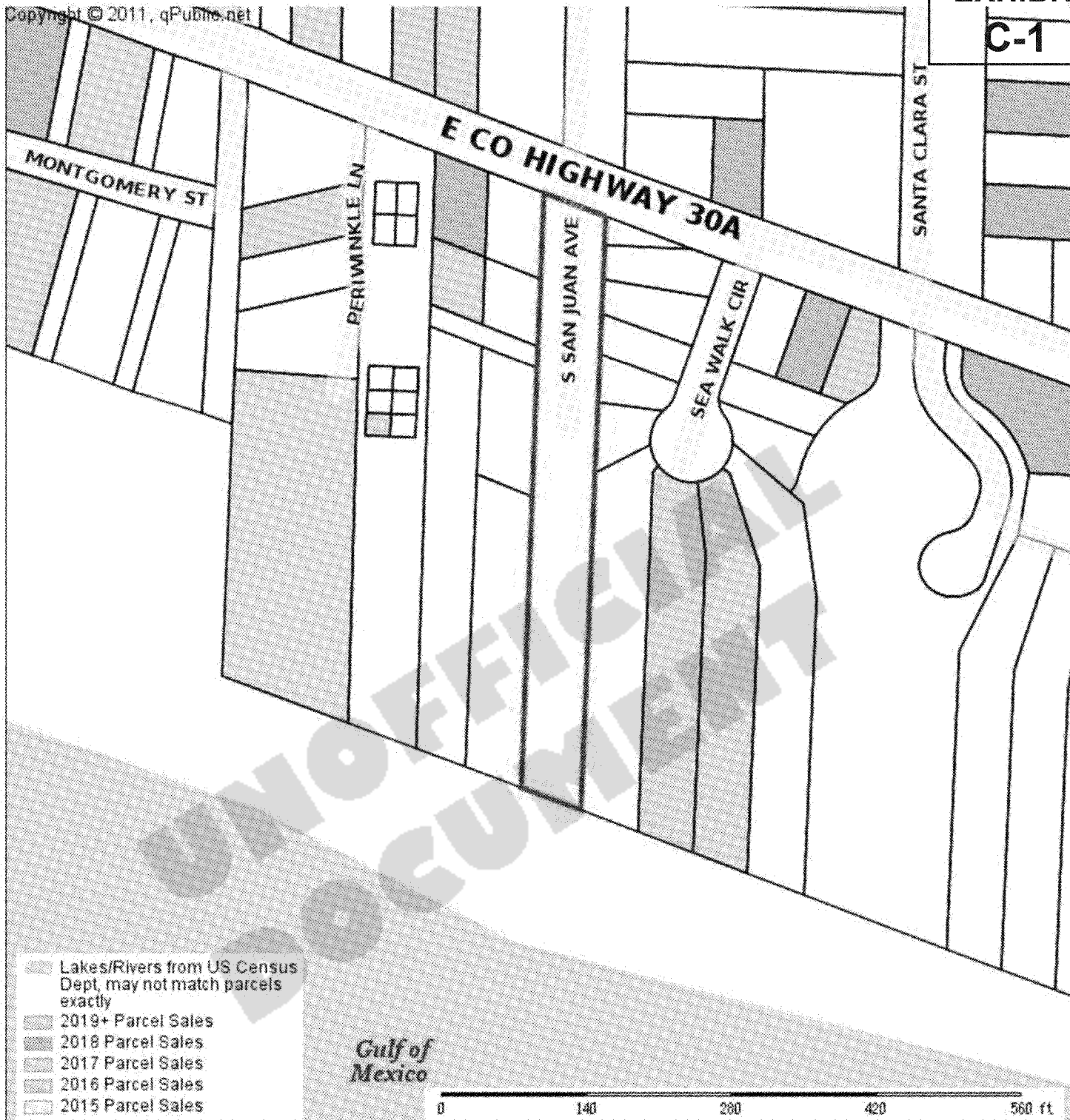
Voelker Surveying

110 Laguna Lane, Suite 4
Santa Rosa Beach, Florida 32459

Phone: 850-231-6300
 Fax: 850-231-6305
 Email: info@voelkersurveying.com
 Website: www.voelkersurveying.com

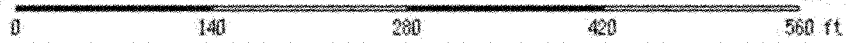
Surveying & Report by
The Voelker Surveying Firm
and the Civil Engineer
and the State of Florida
Surveyor's License No.
10000 W. Voelker

Date



- Lakes/Rivers from US Census Dept, may not match parcels exactly
- 2019+ Parcel Sales
- 2018 Parcel Sales
- 2017 Parcel Sales
- 2016 Parcel Sales
- 2015 Parcel Sales

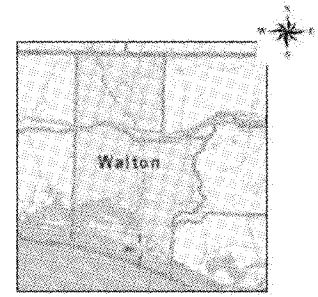
Gulf of Mexico



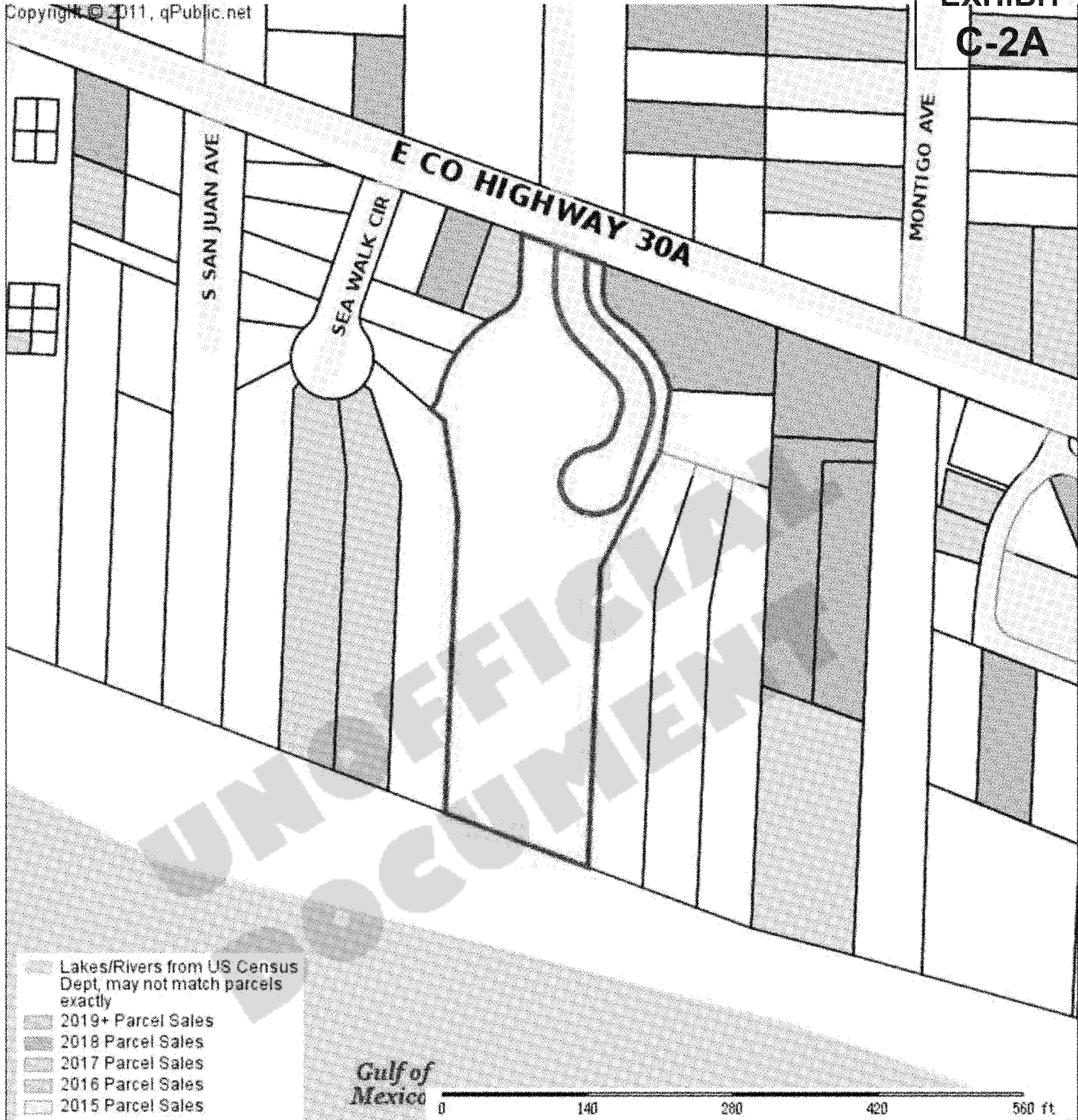
Walton County Appraiser

Parcel: S SAN JUAN AVE Acres: 0.084573

Name:		Land Value:	
Site:		Building Value:	
State:		Misc Value:	
		Just Value:	
		Assessed Value	
Mail:		Exempt Value	
		Taxable Value	

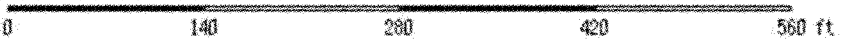


Walton County makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified tax roll. All data is subject to change before the next certified tax roll.

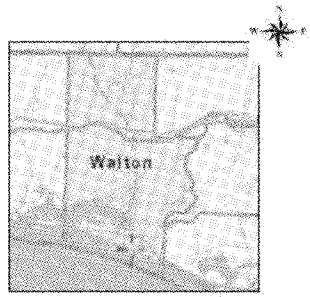


- Lakes/Rivers from US Census Dept, may not match parcels exactly
- 2019+ Parcel Sales
- 2018 Parcel Sales
- 2017 Parcel Sales
- 2016 Parcel Sales
- 2015 Parcel Sales

Gulf of Mexico



Walton County Appraiser			
Parcel: 23-3S-19-25100-000-00A0 Acres: 1.251			
Name:	WALTON COUNTY	Land Value:	3,055,050
Site:	BRAMBLE GROVE PL	Building Value:	0
State:		Misc Value:	25,000
Mail:	COMMISSIONERS	Just Value:	3,080,050
	P O BOX 1260	Assessed Value	2,280,801
	DEFUNIAK SPRINGS, FL 324351260	Exempt Value	2,280,801
		Taxable Value	0



Walton County makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified tax roll. All data is subject to change before the next certified tax roll.
Date printed: 10/28/19 : 23:14:41

EXHIBIT
C-2B



[Sales In Area](#)
 [Previous Parcel](#)
 [Next Parcel](#)
 [Field Definitions](#)
 [Return to Main Search](#)
 [Walton Home](#)

Owner and Parcel Information			
Owner Name	WALTON COUNTY	Today's Date	October 29, 2019
Mailing Address	COMMISSIONERS P O BOX 1260	Parcel Number	23-3S-19-25100-000-00A0
Location Address	DEFUNIAK SPRINGS, FL 32435-1260	Tax District	South Walton Fire (District 7)
Property Usage	VACANT GOV (008000)	2019 Millage Rates	9.9711
Section Township Range	23-3S-19	Acreage	1.251
		Homestead	N

[Show Parcel Maps](#)
 [Generate Owner List By Radius](#)

Value Information	Legal Information
2019 Certified Values	
Building Value	\$0
Extra Feature Value	\$25,000
Land Value	\$3,055,050
Land Agricultural Value	\$0
Agricultural (Market) Value	\$0
Just (Market) Value*	\$3,080,050
Assessed Value	\$2,280,801
Exempt Value	\$2,280,801
Taxable Value	\$0
Maximum Save Our Homes Portability	\$0
AGL Amount	\$799,249
<p>"Just (Market) Value" description - This is the value established by the Property Appraiser for ad valorem purposes. This value does not represent anticipated selling price.</p>	
<p> Tax Information </p>	
<p style="text-align: center;"> LEGAL DESCRIPTION: THAT PART OF LAND LYING BETWEEN BLKS A & B SEAWALK S/DDESCICTED AS NOT INCLUDED ON PLAT OF SEAWALK S/D PB 9 PG 3 </p> <p>The legal description shown here may be condensed for assessment purposes. Exact description should be obtained from the recorded deed.</p>	

Building Information
No buildings associated with this parcel.

Extra Features Data				
Description	Number of Items	Unit Length x Width x Height	Units	Year Built
CONCRETE	1	0 x 0 x 0	1 UT	2000
BATH HSE	1	0 x 0 x 0	1 UT	2000
ASPHALT	1	0 x 0 x 0	1 UT	2000
BOARDWALK	1	0 x 0 x 0	1 UT	2000

Land Information				
LAND USE	NUMBER OF UNITS	UNIT TYPE	Frontage	Depth
OCN FT	109.5	FF	109	500

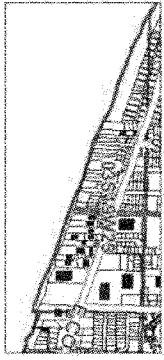
Sale Information

Multi-Parcel Sale	Sale Date	Sale Price	Instrument	Deed Book	Deed Page	Sale Qualification	Vacant or Improved	Grantor	Grantee
No Sales Information available for this parcel									
Sales In Area	Previous Parcel	Next Parcel	Field Definitions	Return to Main Search	Walton Home				
<p>The Walton County Property Appraiser's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The Senior Exemption Does Not Apply to All Taxing Authorities. Just (Market) Value is established by the Property Appraiser for ad valorem tax purposes. It does not represent anticipated selling price. Working values are subject to change. Website Updated: October 25, 2019</p>									

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UNOFFICIAL
DOCUMENT

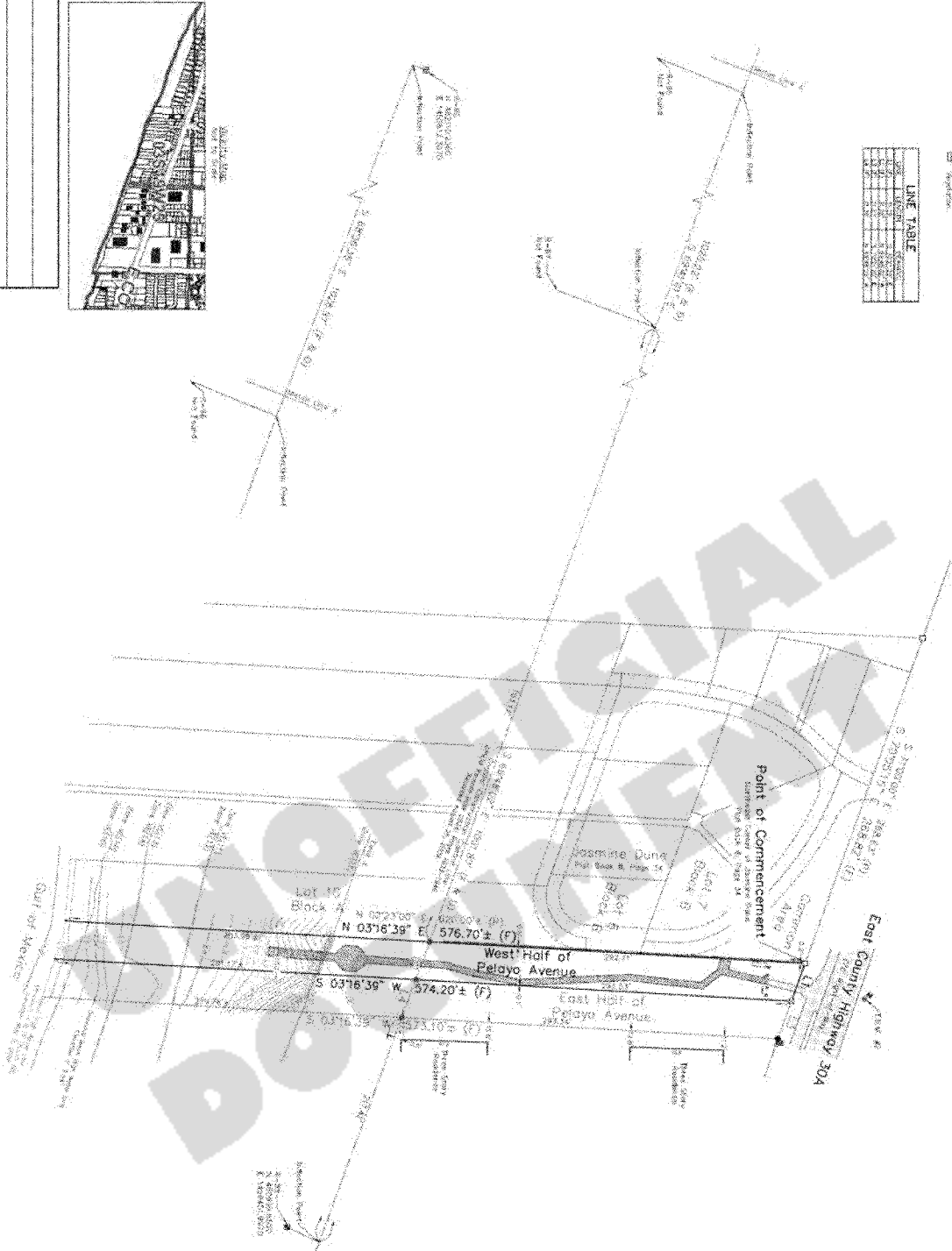
NO.	DATE	DESCRIPTION
1	11/10/2010	ISSUE FOR PERMITS
2	04/15/2011	REVISIONS TO PERMIT
3	05/05/2011	REVISIONS TO PERMIT
4	05/24/2011	REVISIONS TO PERMIT
5	07/14/2011	REVISIONS TO PERMIT
6	07/29/2011	REVISIONS TO PERMIT
7	08/02/2011	REVISIONS TO PERMIT
8	08/02/2011	REVISIONS TO PERMIT



LINE TABLE

LINE NO.	DESCRIPTION	DATE
1	1/2" SCALE	11/10/2010
2	1/4" SCALE	04/15/2011
3	3/8" SCALE	05/05/2011
4	1/2" SCALE	05/24/2011
5	3/4" SCALE	07/14/2011
6	1" SCALE	07/29/2011
7	1 1/4" SCALE	08/02/2011
8	1 1/2" SCALE	08/02/2011

- LEGEND**
- Boundary Line
 - Mean High Water Line
 - Proposed Boundary
 - Proposed Mean High Water Line
 - Easement
 - Survey Monument
 - Proposed Survey Monument



Survey of Pelaya Avenue and Highway 304
 State of Florida
 Survey License No. 12345
 Date: 11/10/2010

LEGAL DESCRIPTION:
 A certain tract of land, to-wit: the West Half of Pelaya Avenue, East County Highway 304, Section 23, Township 3 South, Range 14 West, Walton County, Florida, as more fully described as follows:
 Commencing at the Point of Commencement, a distance of 116.52 feet S 0° 00' 00" W to a 1/2" iron pipe monument set on the South side of Pelaya Avenue, 200 feet S 0° 00' 00" W to the intersection of Pelaya Avenue and Highway 304, a distance of 128.00 feet S 90° 00' 00" E to the intersection of Pelaya Avenue and Highway 304, a distance of 574.20 feet S 03° 16' 39" E to the intersection of Pelaya Avenue and Highway 304, a distance of 574.20 feet S 03° 16' 39" E to the intersection of Pelaya Avenue and Highway 304, a distance of 116.52 feet S 0° 00' 00" W to the Point of Commencement, containing 100,000.00 square feet of land, more or less, as shown on the accompanying plan.

SURVEYOR'S REPORT:
 I, the undersigned, a duly licensed Professional Surveyor in the State of Florida, have personally supervised and conducted the above described survey, and I certify that the same were performed in strict accordance with the provisions of the Surveying Law of the State of Florida, and I have not observed any error or mistake in the same.

I further certify that the above described survey was conducted in strict accordance with the provisions of the Surveying Law of the State of Florida, and I have not observed any error or mistake in the same.

I, the undersigned, a duly licensed Professional Surveyor in the State of Florida, have personally supervised and conducted the above described survey, and I certify that the same were performed in strict accordance with the provisions of the Surveying Law of the State of Florida, and I have not observed any error or mistake in the same.

I, the undersigned, a duly licensed Professional Surveyor in the State of Florida, have personally supervised and conducted the above described survey, and I certify that the same were performed in strict accordance with the provisions of the Surveying Law of the State of Florida, and I have not observed any error or mistake in the same.

I, the undersigned, a duly licensed Professional Surveyor in the State of Florida, have personally supervised and conducted the above described survey, and I certify that the same were performed in strict accordance with the provisions of the Surveying Law of the State of Florida, and I have not observed any error or mistake in the same.



EXHIBIT
 C-3

A BOUNDARY & MEAN HIGH WATER LINE SURVEY
 FOR
 COASTAL RESOURCES 5 LAND TRUST

Section 23, Township 3 South, Range 14 West, Walton County, Florida

FILED:
 11/10/2010
 11/10/2010
 11/10/2010
 11/10/2010
 11/10/2010
 11/10/2010
 11/10/2010
 11/10/2010

Voelker Surveying

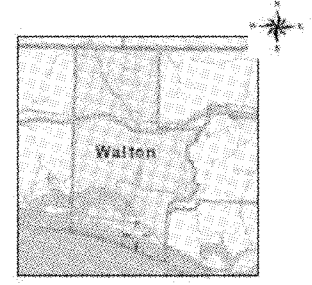
110 Logan Lane, Suite A
 Santa Rosa Beach, Florida 32459
 Phone: 850.231.8300 Fax: 850.231.8300
 (S: 7584) web: voelkersurvey.com



Walton County Appraiser

Parcel: SANTA CLARA ST Acres: 0.0992654

Name:		Land Value:	
Site:		Building Value:	
Sale:		Misc Value:	
Mail:		Just Value:	
		Assessed Value	
		Exempt Value	
		Taxable Value	



Walton County makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified tax roll. All data is subject to change before the next certified tax roll.
Date printed: 10/28/19 : 23:24:33