

March 9, 2026

VIA ELECTRONIC MAIL

Chasity H. O'Steen
County Attorney
Leon County Attorney's Office
301 S. Monroe Street, Suite 202
Tallahassee, FL 32301
osteenc@leoncountyfl.gov

Re: February 20, 2026, Demand Letter to Florida Sun Estates 2, LLC

Dear Ms. O'Steen,

This firm represents Florida Sun Estates 2 LLC ("FSE"), and we write to respond to your February 20, 2026, correspondence regarding the recent water service issues at Florida Sun Estates Mobile Home Park.

FSE takes very seriously the issues encountered by its residents, and is committed to ensuring its residents receive uninterrupted water service. FSE appreciates the County's concern and engagement on this important issue.

As you know, in late January and early February of this year, Tallahassee experienced uncharacteristic repeated hard freezes and wind chills that caused water line breaks throughout the city, including at FAMU and FSU dormitories, and a number of other commercial and residential properties.

FSE likewise suffered water line breaks and frozen pipes due to the intense cold, with the first of these issues occurring on January 31, 2026. FSE took prompt and diligent action by immediately deploying maintenance personnel, retaining plumbing contractors, coordinating with City technicians, and communicating with residents to address the water service issues. While main water line breaks were initially identified and repaired on FSE's side, FSE was advised that water service interruptions also resulted from issues on the City's side of the supply line. FSE and the plumbers retained by FSE worked with the City to determine the cause of water service issues over the coming days (during which water service experienced intermittent issues). Water service was restored in its entirety at approximately 12PM on Wednesday, February 4, 2026, as is confirmed by home specific meter flow readings from that date.¹ The

¹ FSE utilizes Metron water meters that monitor water use by residence.

restoration of water service was also confirmed by news outlets who arrived on site on February 4th.

On the afternoon of February 4th, after water service was fully restored, Leon County emergency services arrived on site with portable restrooms and showers. As water service had been restored these portable restrooms and showers were not needed by FSE residents, but were utilized by others in the community.²

In sum, FSE understands that the water service issues resulted from three different issues: (1) main water line breaks on the FSE side and other frozen lines affecting certain FSE residents; (2) City supply line outages; and (3) an FSE resident inadvertently closing a shut off valve that affected more than just their own residence. As noted above, FSE took immediate action to resolve the water line breaks on its side, and has also taken steps to ensure water shut off valves can be accessed only by authorized personnel.

In the course of resolving the water service issues FSE became aware that a needed permit from the Florida Department of Health ("DOH") had lapsed. FSE took immediate steps to renew the permit, and is pleased to report that all DOH permit issues have been resolved.

Importantly, throughout the outage, FSE maintained proactive communication with its residents, including via bulk text messages, to ensure residents received up to date communications regarding the status of the water service and restoration efforts.

With respect to the County's demand for reimbursement of expenses incurred by the County to provide emergency services, we note that water service was restored prior to the time any County emergency services were brought on site. Nevertheless, FSE will agree to reimburse the County for actual expenses incurred by the County. To that end, FSE requested, and received today, itemized documentation of such expenses. FSE requests permission to provide reimbursement of such expenses via a reasonable payment plan to avoid strains on FSE cash flow.

Additionally, as a show of good faith, FSE is providing rent abatement to all residents affected by the water service issues. Such abatement will cover the period of February 1–6, 2026, for all affected residents.³

It should be noted that three properties that are not owned by FSE are currently receiving water service through FSE's water lines instead of directly from the City of Tallahassee. Residents of at least two of these properties were impacted by the recent water service issues. FSE requests the County's assistance in providing City water service directly to these properties.

² A subsequent water line break occurred in the early morning hours of February 6, 2026, but was quickly repaired.

³ FSE reserves all rights, defenses, claims, and remedies under Florida law, and nothing in this letter constitutes an admission of any liability or wrongdoing on behalf of FSE.

Thank you for the opportunity to respond to your correspondence. We look forward to working cooperatively with the County to resolve these issues.

Sincerely,

/s/ James A. McKee

James A. McKee

Cc: Charles Loving, III