

IN THE COUNTY COURT IN AND FOR DUVAL, FLORIDA
CASE NO.
CIVIL DIVISION
COMPLAINT

**FCI FL2 Holdings, LLC dba
Lansdowne Crossing,**

Plaintiff(s),

vs.

Andre R Woodard

,

Defendant(s)

/

COMPLAINT
COUNT I - EVICTION OF RESIDENTIAL TENANT

PLAINTIFF, FCI FL2 Holdings, LLC dba Lansdowne Crossing sues Defendant(s), Andre R Woodard,, (hereinafter "tenant(s)"), and states:

1. Plaintiff is authorized for business in this County.
2. Plaintiff owns or is the lessor of the real property "the premises" in this county within the meaning of Florida Stat. Sec. 83.43 (3) described as:

Lansdowne Crossing
1600 LANSDOWNE DR APT 606
JACKSONVILLE, FL 32211-9010
3. Tenant(s) reside(s) in this county.
4. This is an action to evict tenant(s) from the premises.
5. Tenant(s) retain(s) possession of the premises without a written lease as a month-to-month tenant at-will requiring rent of \$975.00 per month to be paid the first of each month.
6. Tenant(s) failed to pay rent due through the following month(s): March.
7. Tenant(s) owe(s) Plaintiff rent due through the month(s) stated in paragraph 6 herein in the total sum of \$975.00.
8. Plaintiff served Tenant(s) notice to pay rent or vacate the premises on March 6, 2024 as shown by copy or copies of notice(s) attached hereto and incorporated herein as Plaintiff's Exhibit(s) "A", but Tenant(s) refuse(s) to do either.
9. In accordance with Fla. Stat. Section 83.60(2), if Tenant(s) fails deposit the sum of \$975.00 in the Court Registry, plus rent which accrues during the pendency of this action, then

Plaintiff is entitled to a Default Judgment for Removal of Tenant(s) and to recover a judgment for rent due and owing, plus costs in accordance with Fla. Stat. Sections 83.59 and 83.625.

10. Failure of tenant(s) to pay rent as due caused plaintiff to retain undersigned counsel and incur reasonable attorney's fees and costs, which tenant(s) should pay pursuant to Fla. Stat. Sec. 83.48.

WHEREFORE, PLAINTIFF DEMANDS JUDGMENT for possession of the premises, rent due, court costs and attorneys fees against the Defendant(s) and other available remedies in accordance with Fla. Stat. Section 83.625 and for such other relief this Court deems just and proper.

Dated: March 26, 2024

s/ Elizabeth S. Rivera, Esq.

Elizabeth S. Rivera, service@barfieldpa.com

FL Bar Number 57330

Attorneys for Plaintiff

Barfield McCain Ayoub, P.A.

4460 Medical Center Way

West Palm Beach, FL 33407

Telephone: (561) 650-8139

Fax: (561) 650-8146

NOTICE OF DEBT

You are indebted to **FCI FL2 Holdings, LLC dba Lansdowne Crossing** for the amount of **\$975.00**. Unless, within 30 days of receiving this notice, you dispute the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector. If you notify the debt collector in writing within the 30-day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a judgment against you and a copy of such verification or judgment will be mailed to you by the debt collector. Although you have 30 days to dispute the debt, that period does not delay initiation of legal action against you. Upon your written request within the 30-day period, the debt collector will provide you with the name and address of the original creditor, if different from the current creditor.

EXHIBIT A

THREE DAYS NOTICE

DATE: 03/06/2024

TO: Andre R. Woodard

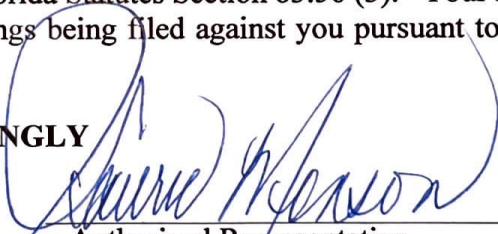
AND ALL OTHERS IN POSSESSION OF 1600 Lansdowne Dr, 6-606, Jacksonville, FL 32211 and located in County, Florida.

You are hereby notified that you are indebted to me in the sum of **\$975.00** for the rent designated in the rental agreement and for use of the premises described above and now occupied by you as a result of your failure to pay such rent for the following month(s): **March** of 2024.

I demand payment of the rent or possession of the premises within three (3) days (excluding Saturdays, Sundays, and legal holidays) from the date of delivery of this notice. **To Wit: on or before the 11 day of March, 2024.**

This notice is given to you pursuant to Florida Statutes Section 83.56 (3). Your failure to comply with this notice may result in eviction proceedings being filed against you pursuant to Florida Statutes Section 83.

PLEASE BE GOVERNED ACCORDINGLY



Authorized Representative

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of:

This notice was served personally.
The person(s) were absent from his/her last usual place of residence, and this notice was delivered and posted at the residence/address referenced above.

BY: 

Authorized Agent for Landlord

DATE: 03/06/2024

Date of Service

Landlord: Lansdowne Crossing - MW-S&L JACKSONVILLE 1 LLC

Address: 1600 Lansdowne Dr,
Jacksonville, FL 32211

Telephone: (904) 479-1715

IMPORTANT NOTICE: