

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

CHATEAU WOOD
HOMEOWNERS ASSOCIATION, INC.

Plaintiff,

CASE NO.:

v.

MARK S. ALLEN, UNKNOWN SPOUSE OF
MARK S. ALLEN AND GREEN CORRIDOR
PROPERTY ASSESSMENT CLEAN ENERGY DISTRICT,

Defendants.

COMPLAINT

The Plaintiff indicated in the style above, CHATEAU WOOD HOMEOWNERS ASSOCIATION, INC. hereafter referred to as "Association," sues the Defendants, MARK S. ALLEN, hereafter referred to as "Owner," UNKNOWN SPOUSE OF MARK S. ALLEN and GREEN CORRIDOR PROPERTY ASSESSMENT CLEAN ENERGY DISTRICT, and states:

COUNT ONE

1. This is an action to foreclose a Claim of Lien for homeowners' association assessments in accordance with section 720.3085 Fla. Stat.
2. Association is a homeowners' association and a Florida corporation, not-for-profit operating pursuant to Chapter 720, Fla. Stat. in the County where this action is filed.
3. Owner is the fee simple owners of the real property described on the claim of lien attached to this Complaint and identified as Exhibit "A."
4. Owner is a member of Association.

5. Association may levy and collect assessments for common expenses against parcels as provided in Chapter 720 Fla. Stat. Association has made assessments for common expenses against the parcel owned by Owner.

6. Owner has failed to pay the assessments due on a timely basis as they became due and payable.

7. Association has recorded a claim of lien against Owner's parcel as a result of the failure to pay the amounts owed. The lien is recorded in the Public Records of the county where the parcel is located. The claim of lien is attached hereto as Exhibit "A" to this Complaint.

8. The assessments levied against Owner's parcel are delinquent and Association is entitled to foreclose the claim of lien which, pursuant to sec. 720.3085, Fla. Stat. provides that the claim of lien secures all unpaid assessments that are due and that may accrue subsequent to the recording of the claim of lien and before entry of a certificate of title, as well as interest, late charges, and reasonable costs and attorney fees incurred by the association incident to the collection process.

9. In addition to its rights pursuant to Chapter 720, Association is authorized to pursue foreclosure of its claim of lien based upon its Declaration of Covenants which is recorded in the Public Records of the county where the unit is located. Association is entitled to collect administrative late charges pursuant to its Declaration.

10. Defendant, UNKNOWN SPOUSE OF MARK S. ALLEN, may claim some right, title or interest in the property that is the subject of this lien foreclosure action. Any such right, title or interest is inferior and subordinate to the interest of the Association as described herein

11. Defendant, GREEN CORRIDOR PROPERTY ASSESSMENT CLEAN ENERGY DISTRICT, may claim an interest in the subject property by virtue of that Lien recorded on October 11, 2019 in Official Records Book 30949, Page 1923, of the Public Records of Palm Beach County, Florida and the lien recorded on October 25, 2019 in Official Records Book 30982, Page 1848, of the Public Records of Palm Beach County, Florida. The Association's lien relates back prior to the liens held by Defendant, GREEN CORRIDOR PROPERTY ASSESSMENT CLEAN ENERGY DISTRICT, and such lien is subordinate and inferior to the interest of the Association as described herein.

12. Association has complied with all conditions precedent to filing this foreclosure action.

13. Association has engaged the undersigned counsel and has agreed to pay a reasonable fee for his services.

WHEREFORE, Association demands the following relief and requests the court determine:

- A. That this court has jurisdiction of this cause and of the parties;
- B. The amount of money, including assessments, interest, expenses, late charges, attorney's fees and costs that the Association is entitled to recover;
- C. That Association has a valid lien upon the real property of Owner as described in this Complaint for the sums due Association superior in right, title and interest to Owner and all other Defendants to this cause;
- D. That said lien be foreclosed in accordance with Chapter 720, Fla. Stat. and the established rules of procedure of the Court, that, upon default of Owner to pay the amounts

found due the Association, that said real property be sold by the Clerk of Court to satisfy Association's lien consistent with Chapter 720, Fla. Stat and that a deficiency judgment be entered against Owner for the amount remaining unpaid;

E. That the judgment of foreclosure incorporate an order dispossessing Owner or other occupants and requiring that the purchaser at the Clerk's sale, his representatives or assigns, be let into possession of the property; and

F. Award such other relief as maybe just and proper.

COUNT TWO

14. This is an action for damages against Owner to recover delinquent condominium assessments, expenses, costs, late charges, if any, and attorney fees due Association.

15. Association realleges the allegations contained in paragraphs 1 through 6 inclusive and paragraph 13 as if all fully set forth herein.

16. Pursuant to Chapter 720, Fla. Stat., Association is entitled to recover all unpaid homeowners' association assessments, interest, costs, expenses, late charges, if any, and reasonable attorneys fees incident to the collection of the amounts due. Association is entitled to a judgment for damages without waiving its lien rights.

17. Owner has failed to pay the amounts due the Association and the Association is entitled to a judgment for all amounts due.

WHEREFORE, Association demands the following relief and requests the court determine:

- A. The amount of assessments, late charges and interest that the Association is entitled to recover;
- B. The amount of attorneys fees, costs, and expenses incident to the collection of the assessments that the Association is entitled to recover; and
- C. Enter a judgment in the amount determined due against Owner in addition to other relief this Court may deem just and proper.

Dated this 25th day of November, 2025.

Ryan M. Aboud, Esq.
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By: /s/ Ryan M. Aboud, Esq.
Ryan M. Aboud, Esq.
FBN 27366

Claim of Lien for Assessments
Mark S. Allen
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The amount due the lienor remains outstanding as of the 18th day of August, 2025.

Chateau Wood Homeowners Association, Inc.:

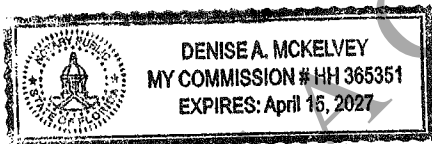
By

Ryan Aboud/Agent

County of Palm Beach)
State of Florida)

Sworn to (or affirmed) and subscribed before me by means of physical presence, this 18 day of August, 2025, by Ryan Aboud, Agent of Chateau Wood Homeowners Association, Inc. who is personally known to me or has produced a drivers license as identification.

Notary Seal:



Denise A. McKelvey
(Signature of person taking acknowledgment)

(Name typed, printed or stamped)

(Title or rank)

Serial number, if any)