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December 23, 2025

Sent via Certified RRR # 9589071052703400687380

Deltona City Commission
2345 Providence Road
Deltona, FL 32725

Re: Howland Holding Group, LLC

Dear Members of the Deltona City Commission,

On December 15, 2025, the City Commission considered withdrawing Ordinance 29-2025. After a lengthy discussion, the Commission declined to withdraw the Ordinance. You were advised by your attorney that should my client object, there would be a safe harbor period during which you can reconsider your position. Unfortunately, the safe harbor provision does not apply to inverse condemnation actions which is what my client is preparing to bring against the City. Because inverse condemnation is a constitutional proceeding, there is no sovereign immunity and thus no limit on the damages that could be assessed.

Even though my client has the right to immediately bring this action against the City, I have been instructed, as a show of good faith on my client's part, to withhold the filing of this action for a period of ten (10) days from the date of this letter.

Please be advised that if Ordinance 29-2025 is not withdrawn, then my client will have no choice but to file an inverse condemnation action against the City of Deltona, as well as any other relief available to us under Florida law. This will include our seeking attorneys' fees and costs from the City and any other offending individuals.

It is our hope that the City Commission will reconsider its position and withdraw Ordinance 29-2025 immediately.

Please be guided accordingly.

Sincerely,

J. Christy Wilson
Attorney for Howland Holding Group, LLC

cc: All members of the City Commission via email:

Santiago Avila, Jr., Mayor at Large: SAvila@deltonafl.gov
Davison Heriot, Commissioner District 1: dheriot@deltonafl.gov
Emma Santiago, Commissioner District 2: emma.santiago@deltonafl.gov
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