

BREACH OF IMPLIED WARRANTY OF HABITABILITY

WITH THE FAILURE TO PROVIDE AND MAINTAIN SAFE, HABITABLE PREMISES EXACERBATING EMOTIONAL DISTRESS LINKED TO THE PTSD DIAGNOSIS AS A DIRECT CONSEQUENCE OF THE MARCH 26TH, 2024 HOME INVASION AND VIOLENT ALTERCATION WITH THE INTRUDER, AND WITH A DOCUMENTED LANDLORD RESPONSE THAT ACCELERATES BOTH REALIZATION OF JUDGMENT AND THE TREBLE DAMAGES THAT THE PLAINTIFF CLAIMS ALONGSIDE IT.

1 Parties Involved:

1. **Plaintiff:** Stephen Boerner (Tenant)
2. **Defendant:** Luther Rollins (Landlord)

2 Statutory Violations:

- **Fla. Stat. §83.51(1)(a):**
 - Failure to comply with applicable housing and health codes to maintain premises in a habitable and safe condition.
- **Fla. Stat. §83.51(2)(a):**
 - Failure to provide reasonable provisions for locks, gates, and structural safety features essential for tenant security and well-being.

3 Summary of Claim:

- This claim arises from the Defendant's repeated and willful failure to comply with statutory obligations under Florida law, specifically Fla. Stat. §83.51.
- The defendant's pattern of neglect, along with bad faith efforts to dismiss the plaintiff's legitimate concerns, directly resulted in a breach of the implied warranty of habitability, created an unsafe living environment, and exacerbated the plaintiff's emotional distress.
- This led to increased individual mental health therapy, prescription drugs, and on-site medical visits, resulting in significant emotional, mental, opportunity, and financial damages.

4 Factual Allegations:

Home Invasion, Initial Neglect, and Awareness of Criminal Threat