



CERTIFICATE OF COMPLETION

KAYE BENDER REMBAUM, P.L.
CERTIFIES THAT

Denise Glass

HAS SATISFACTORILY COMPLETED AT LEAST 4-HOURS OF THE
EDUCATIONAL CURRICULUM REQUIRED FOR SERVICE ON THE BOARD OF
DIRECTORS OF A CONDOMINIUM ASSOCIATION AS PROVIDED IN SECTION
718.112(2)(D)4.B. OF CHAPTER 718, FLORIDA STATUTES

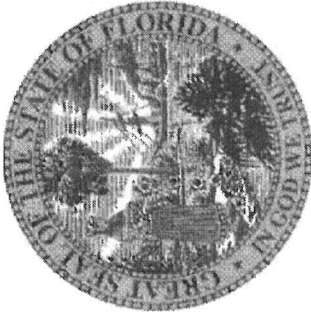
DATED THIS 6 DAY OF February , 2025

DIVISION OF CONDOMINIUMS,
TIMESHARES & MOBILE HOMES

FLORIDA DEPARTMENT OF BUSINESS
AND PROFESSIONAL REGULATION

COURSE INSTRUCTOR

Denise Brennan



MARKUP #1 ->

MARKUP #1 - OUTDATED STATUTE LOCK

BOARD & COUNSEL REVIEW

Sec. N/A (p. 1): Declaration references Florida Statutes without express Kaufman language ("as amended from time to time"), risking unconstitutional impairment of contract challenges upon statutory changes.

Statutory / Legal Reference: Kaufman v. Shere, 347 So. 2d 627 (Fla. 3d DCA 1977); Cohn v. Grand Condo. Ass'n, 62 So. 3d 1120 (Fla. 2011)

Statutory Comparison: Under Florida Supreme Court precedent (Cohn), legislative amendments that impair vested contract rights cannot be applied retroactively to an existing community unless the Declaration contains express language adopting the statute "as amended from time to time" (the Kaufman doctrine).

CURRENT WORDING IN DOCUMENT:

dbor CERTIFICATE OF COMPLETION KAYE BENDER REMBAUM, P.L. CERTIFIES THAT Denise Glass HAS SATISFACTORILY COMPLETED AT LEAST 4-HOURS OF THE EDUCATIONAL CURRICULUM REQUIRED FOR SERVICE ON THE BOAR DIRECTORS OF A CONDOMINIUM ASSOCIATION AS PROVIDED IN SEC 718.112(2)(D)4.B. OF CHAPTER 718, FLORIDA STATUTES DATED THIS 6 DAY OF February ,2025 DIVISION OF CONDOMINIUMS.

SAMPLE DISCUSSION WORDING (FOR HOA ATTORNEY REVIEW):

In accordance with Kaufman v. Shere, amend the governing law clause to read: "...governed by Chapter 718 [or 720], Florida Statutes, as the same exists on the date hereof and as the same may be amended from time to time."