

12. This post-arbitration filing conduct **confirmed the very bad faith, retaliation, and abuse of process** Plaintiff raised from the outset.

### **LEGAL ERRORS IN THE ARBITRATION ORDER (PRESERVED BUT NOT DEFERRED TO)**

13. Although not binding on this Court, the Summary Final Order is legally flawed in multiple respects:

#### **A. Failure to Apply Unclean Hands Doctrine**

14. Florida law bars equitable relief where the claimant engaged in misconduct related to the dispute.

**Congress Park Office Condos II, LLC v. First-Citizens Bank**, 105 So. 3d 602 (Fla. 4th DCA 2013).

15. The Association imposed a disputed assessment **during arbitration**, thereby prejudging the case and retaliating against Plaintiff.

16. The arbitrator failed to address this doctrine despite undisputed evidence.

#### **B. Improper Deference to Ultra Vires Board Action**

17. Associations receive deference **only when acting within their authority and in good faith**.

**Cohn v. The Grand Condominium Ass'n, Inc.**, 62 So. 3d 1120 (Fla. 2011).

18. Assessments imposed without required owner approval are **void**, not voidable.

**Avila South Condo. Ass'n v. Kappa Corp.**, 347 So. 2d 599 (Fla. 1977).

19. The arbitrator failed to invalidate an assessment imposed **without a vote**.