



Date: July 26, 2024

Anthony Disorbo
Colonial Van Lines Inc.
1441 SW 29th Avenue
Pompano Beach, FL 33069

Dear Mr. Disorbo,

Re: Demand for Payment

I am writing to formally demand payment of \$7,998.98 owed to Marcio Sousa Sales for the moving services that was provided to Colonial Van Lines Inc. on/or about August 24, 2022, from Tallahassee, Florida to Dallas, Texas, as well as storage costs incurred. Additionally, I am seeking reimbursement for legal fees totaling \$7,941.84. Total amount of **\$15,940.82**.

Despite Mr. Sales completing the job as agreed, Colonial Van Lines Inc. has failed to compensate him for my services. On September 20, 2023, you issued to Mr. Sales a check for \$3,900, which was subsequently stopped after he left your office, indicating an intentional and unjustified act of bad faith.

Our office has filed a criminal police report with the Broward County Police Department and a criminal complaint with the State Attorney's Office regarding this matter.

Applicable Laws and Violations

Florida Statutes § 817.60 - Stop Payment Order; Offense: Defendants knowingly issued a check with the intent to stop payment, constituting a fraudulent act.

Florida Statutes § 501.204 - Unlawful Acts and Practices: Defendants engaged in deceptive and unfair trade practices by failing to pay for services rendered and intentionally stopping payment on the check.



Case Law:

Stewart Title Guar. Co. v. Sterling, 822 So. 2d 1262 (Fla. 2002): Establishes the elements required to prove a breach of contract claim, including a valid contract, a material breach, and damages.

Butler v. Yusem, 44 So. 3d 102 (Fla. 2010): Establishes the elements required to prove a fraud claim, including false representation, knowledge of the falsehood, intent to induce reliance, and resulting injury.

Hillman Construction Corp. v. Wainer, 636 So. 2d 576 (Fla. 4th DCA 1994): Discusses the elements of unjust enrichment, including a benefit conferred upon the defendant, the defendant's appreciation of the benefit, and the inequitable retention of the benefit without payment.

Potential Fines and Punishments

Under Florida law, the penalties for fraudulent activities such as issuing a check with the intent to stop payment can be severe, including:

Fines: Up to \$1,000 or three times the amount of the check, whichever is greater.

Imprisonment: Up to 5 years in prison for a third-degree felony.

Restitution: Mandatory restitution to the victim for financial losses incurred.

Defendants' actions also expose them to civil penalties for unfair and deceptive trade practices, including additional fines and injunctive relief.

Additional Information

We understand that you operate under multiple business names, including Nationwide Move Management, Colonial Van Lines Relocation Division, and Moving Squad, Inc., all of which share the same address and exhibit the same unlawful conduct. Numerous negative reviews from defrauded clients further demonstrate a pattern of fraudulent behavior. Please see BBB reviews.



Law Office of Legal Help at law
Legal help 4 you LLC
160 W CAMINO REAL, Ste 102
Boca Raton, Florida 33432

If payment in full is not received within 14 days of your receipt of this letter, I will have no choice but to file a lawsuit against you and Colonial Van Lines Inc. for breach of contract, fraud, and unjust enrichment. This lawsuit will include claims for damages, interest, and legal fees incurred to date.

Please be aware that this letter may be presented as evidence of your refusal to settle this matter amicably.

Sincerely,

Marcio Sousa Sales

Pro Se

&

Legal Help 4 You

160 W Camino Real, Ste 102

Boca Raton, FL 33432

Phone: (561) 770-8909

Email: rs@legalhelp4y.com



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Proof of Service by Certified Mail

State of Florida
County of West Palm Beach

I Marcio Sales declare:

I am over the age of 18 years and not a party to this action.

My address is: [Your Address], [City, State, Zip Code].

On July 26, 2024, I served the attached Demand Letter on Anthony Disorbo of Colonial Van Lines Inc. by placing a true and correct copy thereof in a sealed envelope with postage fully prepaid, and sending it via United States Postal Service Certified Mail, Return Receipt Requested, addressed as follows:

Anthony Disorbo
Colonial Van Lines Inc.
1441 SW 29th Avenue
Pompano Beach, FL 33069

I declare under penalty of perjury under the laws of the State of Florida that the foregoing is true and correct.

Legal Help 4 you

Executed on July 26, 2024



LEGAL HELP 4 YOU LLC
Law Office of Legal Help at law
Legal help 4 you LLC
160 W CAMINO REAL, Ste 102
Boca Raton, Florida 33432

EXHIBIT 1

Barcode and QR code on the left side of the document.

STOP PAYMENT

20397

Colonial Van Lines, Inc.
1441 SW 29th Ave.
Pompano Beach, FL 33069

SEACOST NATIONAL BANK
Delray Beach, Florida 33483
63-615/670

9/20/2023

PAY TO THE ORDER OF BBS Transportation & Services LLC

Three Thousand Nine Hundred and 00/100

\$ 3,900.00 DOLLARS

BBS Transportation & Services LLC
9893 Liberty Rd.
Boca Raton, FL 33434

MEMO 1190580-CV

VOID AFTER 30 DAYS

AUTHORIZED SIGNATURE

111012822
10/03/2023
4841672650

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

RETURN REASON-C
STOP PAYMENT

20230001
4031
1
04209

000008052994729
011000138 09/29/2023


0030007181

00000390000



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Boca Raton, Florida 33432

EXHIBIT 2

1  **COLONIAL**
VAN LINES

BINDING ESTIMATE FOR SERVICES
1441 SW 28th Ave Suite # 100 Pompano Beach, FL 33069
Toll Free: 1-800-970-7498 Fax: 954-516-0536
U.S. DOT No. 1434373 / MC # 681534
colonialvanlines.com

281-815-660
STORAGE

COAST. DALLAS, TX

No payment collected
Estimate / Order for Services Estimate No.: 1190980-CV

Move date July 3

Moving Coordinator Information		Pickup Information	
Location - #004	Shipper Name: Kimberly Hilton	Address: 554 Fairway Drive	
Your Moving Coordinator: Drexel Benson	TALLAHASSEE, FL 32301		
Phone: 1-800-970-7498 Ext. 146	Phone(s): / (336) 225-3016		
Fax: 954-516-0536	Email: khilton152@gmail.com		
Email: Drexel.Benson@colonialvanlines.com			

KD Benson

Moving Estimate Details		Delivery Information	
Created: 8/24/2022	Estimated Weight: 2,565 lbs.	Shipper Name: Kimberly Hilton	
Tariff: CVL-411	Move Mileage: 837 miles	Address: 6200 Reiger Avenue	
Est. Packing Dates:		DALLAS, TX 75214	
Est. Pickup Dates: 8/30/2022 - 8/31/2022		Phone(s): / (336) 225-3016	
Est. Delivery Dates: 11/29/2022 - 12/13/2022			

Additional Requested Items		Moving Estimate Summary	
Description	Charge	Cost of Transportation	\$1,438.22
		Cost of Bulky	\$0.00
		Cost of Accessories (see Accessorial charge details)	\$0.00
		Cost of Packing	\$222.00
		Cost of Unpacking	\$0.00
		S.I.T. Charges	\$998.58

Accessorial Charge Details		Binding Estimate Fee	
Orig.	Dest.		\$1,465.39
Floors:	0	Total Moving Estimate	\$4,124.19
Stairs:	0	Deposit	\$1,690.49
Truck Access:	True	Est. Balance Due on Delivery	\$2,433.70
Long Carry Ft.:	0		

6362.40
6.00

Your Binding Estimate includes:

- Your personal moving coordinator will provide you with expert advice and guidance throughout your move
- All taxes, tolls, fuel, fuel surcharge
- Standard valuation protection of 60 cents per pound per article up to \$20,000
- Loading and unloading and furniture placed & set-up at destination
- All furniture is blanket wrapped at no extra charge
- Disassembly and reassembly of all standard furniture items. Note: reassembly at destination only if origin agent disassembled item(s) at pick up.
- Itemized inventory indicating condition at origin
- Up to 75 feet long carry at origin and destination
- Up to 21 steps at origin and destination
- Packing and unpacking if indicated on your estimate
- Any changes to your furniture list or services requested must be communicated to your moving coordinator at minimum 5 business days prior to the first estimated pack or load date.
- No date change penalties if your request is made more than 5 business days prior to your first estimated pack or load date

Paper work in storage



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EXHIBIT 3

BANK OF AMERICA, N.A.
EAST RETURN ITEMS

Page 001 of 001
Bank : 00075
Center :
Divider: 4,031
Code : 5 M

Deposit account:xxxxxxxxxx6747
Charge account :xxxxxxxxxx6747
Store/Reference:00000000000000

000361 144684 0001 000237 102
BBS TRANSPORTATION SERVICES LLC
22187 AQUILA ST
BOCA RATON FL 33428-4009
US

Date of Notice: 10-03-2023

Dear Valued Customer:

We're writing to notify you that the item or items listed below, which were deposited to your account, have been returned unpaid. As a result, we've deducted them from your account. Please adjust your account records by subtracting the total shown below.

Number of returned items: 1
Amount of returned item(s): 3,900.00
Return items fee: 0.00
Total: 3,900.00

Sequence/ Dep Date	ABA Number/ Dep Amount	Maker Name/ Check Date	Return Reason/ Additional Data	Amount
2032767211 9/29/2023	0670-0515 3,900.00		Stop Payment	3,900.00

If you have any questions or need additional information, please contact one of our Customer Service Representatives at 1.800.432.1000. We appreciate your business and look forward to serving you in the future.

Sincerely,
Returns & Exceptions



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Boca Raton, Florida 33432

EXHIBIT 4



Invoice 3052-7276374

Client: MARCIO SOUSA SALES

Invoice Number: 7276374

Invoice Date: July 19, 2024

Due Date: July 22, 2024

Description	Quantity	Rate	Amount
Email Hours (Rate per Hour)	2.5	\$750.00	\$1550.00
Phone Calls (Rate per Hour)	6.3	\$750.00	\$4,550.00
Federal Subpoena	1	\$480.00	\$480.00
Reviewing Contract Spreadsheets	7	\$750.00	\$5,250.00
Conference via Zoom with Court	1	\$650.00	\$650.00
Conversation with State Attorneys (48 minutes)	0.8	\$750.00	\$750.00
Conversation with Federal Prosecutor (39 minutes)	0.65	\$700.00	\$750.00
Print Documents	42	\$5.00	\$210.00
Served Subpoena	1	290.00	\$290.00

Subtotal: \$14,480.00

Legal Fee Agreement:

The legal fee will be collected based on the 25% rate from the total amount collected instead of 35%. Please note that the legal fees are charged based on the 25% fee contract with Freight Connection.

Total Due: \$7,941.84