

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT
IN AND FOR POLK COUNTY, FLORIDA

CASE NO.: 2026-CA-002394

THE FOREST AT RIDGEWOOD
HOMEOWNERS ASSOCIATION, INC.,
a Florida not-for-profit Corporation,

Plaintiff

v.

LARRY BASSETT, individually and
in his former capacity as Director,

Defendant.

_____ /

PLAINTIFF'S AMENDED REQUEST TO PRODUCE TO DEFENDANT

COMES NOW, Plaintiff, THE FOREST AT RIDGEWOOD HOMEOWNERS ASSOCIATION, INC., by and through the undersigned counsel and pursuant to Rule 1.350 of the Florida Rules of Civil Procedure and requests the Defendant, LARRY BASSETT, to produce all of the documents requested as set forth below in Exhibit "A" for the purpose of examination and copying. Such production is to be made to JENNIFER A. ENGLERT, ESQ., at the office of THE ORLANDO LAW GROUP, P.L., 12301 Lake Underhill Road, Suite 213, Orlando, FL 32828, within no more **than thirty (30) days** from the date of service hereof.

Any and all references to the word "you" and/or "your" are in reference to the Defendant, Larry Bassett.

Exhibit "A"

1. Produce a copy of all professional licenses held by you from 01.01.2019 to 12.31.2024.

RESPONSE:

2. Produce all statements for all financial accounts in your name solely or jointly with any other person or entity, whether currently closed or open, that received deposits from Plaintiff between 01.01.2019 and 12.31.2024.

RESPONSE:

3. Produce all statements for all financial accounts in your name solely or jointly with any other person or entity, whether currently closed or open, that deposited funds into any of Plaintiff's bank accounts between 01.01.2019 and 12.31.2024.

RESPONSE:

4. Produce all statements for all financial accounts in your name solely or jointly with any other person or entity, whether currently closed or open, that received deposits from any members of Plaintiff between 01.01.2019 and 12.31.2024.

RESPONSE:

5. Produce all statements for all financial accounts in the name of LTS Worldwide, Inc., whether solely or jointly with any other person or entity, whether currently closed or open, that received deposits from Plaintiff between 01.01.2019 and 12.31.2024.

RESPONSE:

6. Produce your full, complete, filed individual tax returns for the years 2019, 2020, 2021, 2022, 2023 and 2024.

RESPONSE:

7. Produce all K-1s received by you from any business entity owned by you that provided services and/or products to Plaintiff for the years 2019, 2020, 2021, 2022, 2023 and 2024.

RESPONSE:

8. Produce the full, complete, filed corporate tax returns for LTS Worldwide, Inc, for the years 2019, 2020, 2021, 2022, 2023 and 2024.

RESPONSE:

9. Produce the full, complete, filed corporate tax returns for LTS Property Services, Inc, for the years 2019, 2020, 2021, 2022, 2023 and 2024.

RESPONSE:

10. Produce the full and complete file for DBPR disciplinary case 2024-070958 and 2025-12491.

RESPONSE:

11. Produce all social media posts from all social media platforms, (including but not limited to Facebook; LinkedIn; Instagram, Tik Toc, X, etc...) made by you referencing, identifying, reflecting, and/or naming Plaintiff from 01.01.2019 to present.

RESPONSE:

12. Produce all emails, text messages and other written communications between you and any of Plaintiff's Board members that served on the Board from 01.01.2029 to 12.31.2024 mentioning, referencing, and/or regarding any of the allegations in the Complaint in this action.

RESPONSE:

13. Produce all receipts and other written proof of payment for all products and services you were reimbursed for by the Plaintiff from 01.01.2019 to 12.31.2024.

RESPONSE:

14. Produce all written communications (including but not limited to) text messages, emails, instant messages, social media posts, from any of Plaintiff's Board of Directors that served from 01.01.2019 to 12.31.2024 approving and/or authorizing the services and/or products that you, or any of your business entities, billed to Plaintiff from 01.01.2029 to 12.31.2024. (Including reimbursements.)

RESPONSE:

15. Produce all written communications (including but not limited to) text messages, emails, instant messages, social media posts from 01.01.2019 to 12.31.2024 reflecting your communication to any of Plaintiff's Board Members that you do not have a CAM license.

RESPONSE:

16. Produce all documents; photos, videos, communications(written, recorded and/or electronic) and evidence of any and all kind that you contend represents a defense to any of the allegations made against you in the Complaint.

RESPONSE:

17. On or about February 23, 2026 in the Forest at Ridgewood Facebook page, you posted in part, "I SAVED every single email between myself and every board member that I ever dealt with..." Emphasized as quoted.

Produce those emails referenced in the quote above.

RESPONSE:

18. On or about February 23, 2026, in the Forest at Ridgewood Facebook page, you posted in part, "I have all the receipts and will gladly meet with anyone that wants to know the facts and see with their own eyes."

Produce those receipts referenced in the quote above.

RESPONSE:

19. On or about February 27, 2026, in the Forest at Ridgewood Facebook page, you posted in part, "My favorite term [sic] is [sic] "bringing the receipts". And I have most of them since I became involved with eh HOA here..."

Produce those receipts referenced in the quote above.

RESPONSE:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 6, 2026, a copy of the foregoing was furnished to the parties via Florida Eportal electronic service and/or Email Transmission, as follows:

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