

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA

THOROUGHBRED MOTORS INC., a Florida corporation, and 7700 S. TRAIL LLC, a Florida limited liability company,

Plaintiffs,

v.

Case No. 2022 CA 003873 NC

BILL FURST, as Property Appraiser of Sarasota County, Florida, BARBARA FORD-COATES, as Tax Collector of Sarasota County, Florida, and JIM ZINGALE, as Executive Director of the Florida Department of Revenue,

Defendants.

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**AMENDED COMPLAINT**

Plaintiffs, Thoroughbred Motors Inc., a Florida corporation, and 7700 S. Trail LLC, a Florida limited liability company, sue Defendants, Bill Furst, as Property Appraiser of Sarasota County, Florida (“Appraiser”), Barbara Ford-Coates, as Tax Collector of Sarasota County, Florida (“Collector”), and Jim Zingale, as Executive Director of the Florida Department of Revenue, and allege:

1. This is an action to contest an ad valorem tax assessment for the 2021 tax year and this Court has jurisdiction pursuant to Chapter 194, Florida Statutes, and article V, sections 5 and 20 of the Constitution of the State of Florida.
2. As of January 1, 2021, Plaintiff Thoroughbred Motors Inc. was the owner of certain real property located at 7700 S. Tamiami Trail in Sarasota County, Florida and identified

as Parcel No. 0112-14-0011 [“the Property”], which was assessed by Appraiser at a value of \$6,710,900 in 2021.

3. On June 14, 2022, title to the Property was transferred to the current owner of the property, Plaintiff 7700 S. Trail LLC.

4. Appraiser is sued herein in his official capacity and is a necessary party to the action pursuant to section 194.181(2), Florida Statutes.

5. Collector is sued herein in her official capacity and is a necessary party to the action pursuant to section 194.181(3), Florida Statutes.

6. Defendant Jim Zingale is sued herein in his official capacity as Executive Director of the Florida Department of Revenue, and may be a necessary party pursuant to section 194.181(5), Florida Statutes.

7. Pursuant to section 194.171(3)(4), Florida Statutes, Plaintiff Thoroughbred Motors Inc. paid the 2021 taxes on the Subject Property in full. A copy of the receipt is attached and incorporated herein as Exhibit “A.”

8. Plaintiffs have performed all conditions precedent which are required to be performed by Plaintiffs in establishing their right to bring this action. Specifically, this action has been filed within the time period prescribed by section 194.171(2), Florida Statutes.

9. In assessing the Property, Appraiser failed to comply with section 193.011, Florida Statutes and with professionally accepted appraisal practices. Thus, Appraiser’s assessment is not presumed correct.

10. The assessment of the Property exceeds just value.

11. Thus, the assessment is unlawful and invalid.

WHEREFORE, Plaintiffs demand that this Court enter an order setting aside the assessment on the Property; establish the proper assessment of the Property in accordance with the Constitution of the State of Florida, section 193.011, Florida Statutes, and professionally accepted appraisal practices; order the Collector to cancel the original tax bill and issue a new tax bill in said reassessed amount and a refund for any amounts overpaid; award Plaintiffs their costs incurred in bringing this action pursuant to section 194.192, Florida Statutes; and award such other general relief as may be just and equitable.

Dated: November 15, 2022

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