

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MEYERS DIVISION**

**OAKES FARMS, INC., OAKES  
FARM OP, LLC, and SOUTH  
FLORIDA PRODUCE, LLC,**

**CASE NO. 2:25-cv-1126 -SPC-NPM**

**Plaintiffs,**

**vs.**

**STEVEN A. VENEZIANO, JR.,  
individually, VENEZIANO  
FARMS, LLC, and VENEZIANO  
PROPERTY MANAGEMENT,  
LLC,**

**Defendants.**

\_\_\_\_\_ /

**DEFENDANTS' RESPONSE IN OPPOSITION  
TO PLAINTIFFS' MOTION TO REMAND**

Defendants, Steven A. Veneziano, Jr., Veneziano Farms, LLC, and Veneziano Property Management, LLC, by and through their undersigned counsel, hereby respond in opposition to the Motion to Remand [D.E. 8] filed by Plaintiffs, Oakes Farms, Inc., Oakes Farm OP, LLC, and South Florida Produce, LLC.<sup>1</sup> Defendants removed this action from the Circuit Court of the Twentieth Judicial Circuit in and for Collier County, Florida pursuant to 28 U.S.C. § 1441 on the grounds that diversity

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<sup>1</sup> All legal citations contained herein are hyperlinked to Westlaw. Submitted in support of this Response is the Sworn Declaration of Steven A. Veneziano, Jr.

of citizenship existed between Plaintiffs and Defendants and the amount in controversy in the state court action exceeded \$75,000.00. (D.E. 1.) In their motion, Plaintiffs do not contest that: (1) the amount in controversy at the time of removal was in excess of \$75,000; (2) Plaintiffs are all citizens of Florida; (3) the sole members of Defendants Veneziano Farms, LLC, and Veneziano Property Management, LLC are Defendant Steven A. Veneziano, Jr. and his wife, Amy M. Veneziano; or (4) Mrs. Veneziano is a citizen of the state of California.

Plaintiffs' *only* grounds for contesting removal is their claim that Mr. Veneziano, and Mr. Veneziano alone, was domiciled in Florida at the time of removal. Plaintiffs' assertions are without any merit, as Mr. Veneziano established domicile and residency in the State of California in 2024, long before removal on December 3, 2025. Plaintiffs have not submitted any competent evidence that Mr. Veneziano had an intent to remain domiciled in Florida and or that he was in fact domiciled in Florida at the time of removal. As such, Plaintiffs' Motion for Remand properly should be denied.

**A. Legal Framework for Determining Citizenship for Diversity**

In their Motion to Remand, Plaintiffs correctly state that, in determining diversity for subject matter jurisdiction purposes, a party's citizenship is determined by his domicile, citizenship is determined as of the date of removal, and that a limited liability company's citizenship is determined by the citizenship of its individual

members.<sup>2</sup> (D.E. 8 ¶¶ 19-25.) “[A] natural person is a citizen of the state in which he is ‘domiciled.’” *Smith v. Marcus & Millichap, Inc.*, 991 F.3d 1145, 1149 (11th Cir. 2021) (citing *McCormick v. Aderholt*, 293 F.3d 1254, 1257 (11th Cir. 2002)). “[D]omicile (or citizenship) consists of two elements: residency in a state and intent to remain in that state.” *Id.* (citing *Miss. Band of Choctaw Indians v. Holyfield*, 490 U.S. 30, 48, 109 S. Ct. 1597, 104 L.Ed.2d 29 (1989)). “To demonstrate a change of domicile, one must generally do two things: establish a physical presence at the new location and manifest an intention to remain there indefinitely.” *Stewart v. Underwriters at Lloyd's, London*, No. 2:24-CV-326-JLB-NPM, 2025 WL 615181, at \*1 (M.D. Fla. Feb. 26, 2025) (citing *Travaglio v. American Exp. Co.*, 735 F.3d 1266, 1269 (11th Cir. 2013)).

“When determining citizenship for diversity jurisdiction, courts consider the totality of the circumstances.” *Walker v. Fid. Ins. Agency, Inc.*, No. 6:25-CV-1819-PGB-DCI, 2025 WL 3250888, at \*2 (M.D. Fla. Nov. 21, 2025) (citing *Bal Harbour Shops, LLC v. Saks Fifth Ave., LLC*, 645 F. Supp. 3d 1321, 1327 (S.D. Fla. 2022)). Similarly, “[w]hen a party’s domicile is in dispute, courts [also] take a totality-of-the-circumstances approach, weighing various factors such as the locations of

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<sup>2</sup> “In a case removed from state court, diversity jurisdiction rests on the parties’ citizenship at the time of removal.” *Stewart v. Underwriters at Lloyd's, London*, No. 2:24-CV-326-JLB-NPM, 2025 WL 615181, at \*1 n.3 (M.D. Fla. Feb. 26, 2025) (citing *Thermoset Corp. v. Building Materials Corp of Am.*, 849 F.3d 1313, 1317 (11th Cir. 2017)).

immediate family and dependents, principal residence, other real and personal property, employment or business operations, voter and vehicle registrations, licenses, bank accounts, tax payments, organizational memberships, and other indicia of permanent residency.” *Stewart*, 2025 WL 615181, at \*1; *see also Smith*, 991 F.3d at 1149. Here, the totality of the circumstances support the finding that Mr. Veneziano is a citizen of the State of California and was so at the time of removal on December 3, 2025.

**B. Mr. Veneziano is a Citizen of California**

In August 2025, Mr. Veneziano pled guilty to conspiracy to commit wire fraud and conspiracy to commit money laundering involving the U.S. Department of Agriculture’s Coronavirus Food Assistance Program, Case No. 2:25-cr-0160-SPC-NPM, Middle District of Florida (the “Criminal Case”). (Veneziano Decl. ¶ 4.) This plea was part of a continuing fraud investigation involving Oakes Farms in Naples, Florida, in which Mr. Veneziano cooperated with the Federal Government. (*Id.*) While cooperating with the Government, Mr. Veneziano abandoned his domicile in Florida and relocated to California in November 2024. (Veneziano Decl. ¶¶ 2-3; D.E. 1 at 7, ¶¶ 2-3.) The Government was kept apprised of Mr. Veneziano’s residence and relocation to California at all times. (Veneziano Decl. ¶ 5.) Mr. Veneziano has no intent to return to Florida. (*Id.* ¶ 3.)

Mr. Veneziano's wife and children moved to California in late August or early September 2024. (Veneziano Decl. ¶ 6; D.E. 1 at 9, ¶ 3.) Mr. Veneziano's children are enrolled in school in California. (D.E. 1 at 10, ¶ 7.) In December 2024, the Venezianos sold their home at 5567 Tamarind Ridge Drive, Naples, Florida, and, thereafter, Mrs. Veneziano purchased a house in Corando, California that same month. (Veneziano Decl. ¶ 21; D.E. 1 at 9, ¶ 5.) Mr. Veneziano does not have any residence within the State of Florida. (Veneziano Decl. ¶ 21.)

In April 2025, Mr. Veneziano obtained a California driver's license. (D.E. 1 at 7, ¶ 4; Veneziano Decl. ¶ 9.) When Mr. Veneziano applied for a California driver's license, he attempted to surrender his Florida driver's license to the State of California. (Veneziano Decl. ¶ 9.) That same month, he also registered his vehicle in California. (*Id.* ¶ 10.) Mr. Veneziano delayed in obtaining his California driver's license because he wanted to minimize public records of his location, as he feared for his life and his family's safety due to his cooperation with the Government in the aforementioned fraud investigation, which involved many individuals, including Francis A. "Alfie" Oakes, III, the principal owner of Oakes Farms. (*Id.* ¶ 7.)

Upon obtaining his California driver's license, Mr. Veneziano began working in California and he has been employed in California since that time. (*Id.* ¶ 11.) In May 2025, Mr. Veneziano opened a bank account in California in May 2025, and he holds no bank accounts in Florida. (*Id.* ¶ 12.) He filed his 2024 U.S. Federal Tax

Return in California. (*Id.* ¶ 13.) Mr. Veneziano did not register to vote in California because he is a convicted felon and there was no election between the time of his move to California and his felony conviction. (*Id.* ¶ 14.) He did not vote in any Florida election since his move to California, nor would he be able to due to his felony conviction. (*Id.* ¶ 15.)

Thus, after his relocation to California, Mr. Veneziano obtained a driver's license, registered his vehicle, opened a bank account, became employed, filed his taxes, enrolled his children in school, and resides in a home owned by his wife, all in California. His wife and children live in California. Mr. Veneziano maintains no residence in Florida, nor does he hold any bank accounts in the state. Lastly, he left Florida and moved to the other side of the country due to fears for his own safety. He has no intent to move back to Florida. The totality of the circumstances leads to the conclusion that Mr. Veneziano is a citizen of California and that he was a citizen of California at the time of removal.

### **C. Plaintiffs Fail to Establish Veneziano is a Citizen of Florida**

Plaintiffs, on the other hand, challenge Mr. Veneziano's California citizenship, asserting that Mr. Veneziano has "maintained extensive Florida ties that are classic indicia of Florida domicile and or failure to abandon his Florida domicile at the relevant times. . . ." (D.E. 8 ¶ 30.) In making this assertion, Plaintiffs rely upon the declaration of Suzannah Grob, a private investigator and known associate of Alfie

Oakes. (Veneziano Decl. ¶ 23; D.E. 8 at 19.) Based upon Ms. Grob's search of public records, Plaintiffs assert that Mr. Veneziano did not abandon his Florida domiciled based upon: (1) his ownership of a parcel of land in Lee County; (2) his Florida Driver's license as still showing as valid in public records; (3) a Federal Aviation Administration pilot's license issued in 2018; (4) that Mr. Veneziano did not obtain a California driver's license within ten days of moving to California; (5) that Mr. Veneziano's voter registration in Collier County shows as active; (6) that the principal addresses for his entities, and co-defendants, Veneziano Farms, LLC ("Veneziano Farm") and Veneziano Property Management, LLC ("Veneziano Property") are a Florida address; (7) that Mr. Veneziano executed a power of attorney for his Florida attorney in fact to manage certain banking, financial, real estate, and other business affairs in Florida; and (8) and that he pled guilty in the Criminal Case in Florida. (D.E. 8 at 7-10, ¶ 30.) However, despite Plaintiffs' claims to the contrary, none of these public records support a finding that Mr. Veneziano did not abandon his Florida domicile and thereafter establish domicile in California. Defendants will address each in turn.

### **1. Cape Coral Real Estate**

37 Diplomat Parkway West, Cape Coral, Florida 33993 is a 3,125 square foot vacant commercial lot that Mr. Veneziano purchased on or about December 20, 2019, via a Warranty Deed that was recorded at Instrument No. 2020000000303 of

the Public Records of Collier County, Florida. (Veneziano Decl. ¶ 16, Ex. 1.) The lot remains vacant land to this day. (*Id.*) Candidly, Mr. Veneziano forgot of its existence until seeing it listed in Plaintiffs’ Motion for Remand. (*Id.*) Regardless, the Cape Coral lot is a small piece of commercial land, on which no residence could be established, and Mr. Veneziano does not maintain any residence in Florida. (*Id.* ¶ 21.) Plaintiffs also imply that evidence of Mr. Veneziano’s purported Florida domicile is that the Cape Coral lot is taxed in Florida, but “personal property may be separated from its owner, and he may be taxed on its account at the place where the property is, *although it is not the place of his own domicil, and even if he is not a citizen or resident of the state which imposes the tax.*” *Buck v. Beach*, 206 U.S. 392, 401 (1907) (emphasis added). As such, ownership of commercial real property alone does not establish domicile.

## **2. Driver’s Licenses**

As explained above, Mr. Veneziano secured a California driver’s license in April 2025. The reason Mr. Veneziano did not obtain a driver’s license in California within ten days after moving there is because he wanted to minimize any public records that would show his location in California. (Veneziano Decl. ¶ 7.) Due to his cooperation with the Government in the ongoing fraud investigation involving Oakes Farms and Alfie Oakes, Mr. Veneziano feared for his life and his family’s safety. (*Id.*) Ultimately, he obtained his California driver’s license utilizing a



Bakersfield, California address, which was done with the Government's knowledge. (*Id.* ¶ 8.) When obtaining his California driver's license, he did attempt to surrender his Florida driver's license to the State of California. (*Id.* ¶ 9.)

### **3. FAA License**

In 2018, Mr. Veneziano obtained an FAA third class private pilot's license. (Veneziano Decl. ¶ 22.) At that time, he was residing in Estero, Florida. (*Id.*) However, Mr. Veneziano has not piloted any plane in over three years, nor has he had a FAA medical exam in seven years. (*Id.*) As such, that FAA license is not current or valid. (*Id.*)

### **4. Collier County Voter Registration**

As explained above, as convicted felon, Mr. Veneziano is not eligible to vote in Florida. *See* Art. VI, § 4, Fla. Const. This disqualification occurred with the entry of Mr. Veneziano's guilty plea in the Criminal Case in August 2025. Thus, while Collier County may still show Mr. Veneziano's voter registration as active, that is inaccurate, as Mr. Veneziano is disqualified from voting in Florida, as well as California.

### **5. Defendant Corporate Entities**

While the State of Florida Division of Corporations may show Veneziano Farms and Veneziano Property Management as having Florida addresses, it also shows that both of those entities were administratively dissolved on September 26,

2025, over two months before removal. (Veneziano Decl. Exs. 2 & 3.) Mr. Veneziano formed Veneziano Property Management on or about May 5, 2021 to hold and manage certain rental properties and other land holdings. (*Id.* ¶ 17.) However, all assets of Veneziano Property Management were liquidated and sold, and its bank account closed prior to 2025. (*Id.*) Having liquidated all of its assets, Mr. Veneziano abandoned the entity, and it was administratively dissolved when he did not file an annual report in 2025. (*Id.* Ex. 2 at 1.)

Mr. Veneziano formed Veneziano Farms on or about July 30, 2018, at the request of the principal owner of Oakes Farms, Alfie Oakes. (*Id.* ¶ 18, Ex. 3.) Veneziano Farms was a sham company that was involved in committing fraud since its inception and is related to the ongoing fraud investigation involving Oakes Farms. (*Id.* ¶ 18.) Veneziano Farms shut down and had its bank account closed prior to November 7, 2024. (*Id.*) It was abandoned and administratively dissolved upon failure to file an annual report in 2025.<sup>3</sup> (*Id.*)

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<sup>3</sup> The only activity that occurred in the corporate filings for Veneziano Farms between November 2024 and its dissolution in September 2025 was that Steven J. Bracci resigned as the Registered Agent on June 13, 2025, which was done without Mr. Veneziano's knowledge at the time. (Veneziano Decl. ¶ 19, Ex. 4.) Steven J. Bracci is an attorney, and he was the Registered Agent for Veneziano Farms. (*Id.* ¶ 19.) However, Mr. Bracci also is an attorney for Alfie Oakes, the principal owner of Oakes Farms. (*Id.* ¶ 19.) Mr. Veneziano did not contact Mr. Bracci after his relocation to California, as he feared that if he contacted him, he would share Mr. Veneziano's location in California with Mr. Oakes or others. (*Id.*)

## 6. Power of Attorney & the Criminal Case

Plaintiffs assert that Mr. Veneziano's power of attorney, appointing his counsel in the Criminal Case to manage certain of his affairs in Florida, and his Criminal Case in the Middle District of Florida is evidence that Mr. Veneziano's domicile is in Florida. This is not supported under the law. A power of attorney does not establish domicile. *Cf. In re Quartz Hill Mining, LLC*, No. 14-15419-BKC-AJC, 2014 WL 8381311, at \*2–3 (Bankr. S.D. Fla. Aug. 4, 2014) (a power of attorney cannot create venue). Additionally, Defendants can find no authority for the proposition that pending criminal charges are evidence of a person's domicile, nor have Plaintiffs cited to any such authority.

Plaintiffs seemingly take the position that because Mr. Veneziano did not completely sever every single possible tie he may have to the State of Florida, he cannot be considered to have abandoned his domicile in Florida. The law, however, is not so strict. Changing domicile does not require that person dispose of all property, cease all business and personal relationships, and flee the state, never to return again. "A person's domicile is the place of his true, fixed, and permanent home and principal establishment, and to which he has the intention of returning whenever he is absent therefrom." *Sunseri v. Macro Cellular Partners*, 412 F.3d 1247, 1249 (11th Cir. 2005).

Mr. Veneziano's domicile and residence at the time of removal was in California, evidenced in no small part by the service of process made upon him by Plaintiffs at Mr. Veneziano's home in Cornado, California on November 4, 2025. (D.E. 1 ¶ 2; D.E. 1-3 at 8.) "[I]t is a well-established rule that a party's current residence is prima facie evidence of her domicile." *Estate of Cochran by & through Pevarnek v. Marshall*, No. 8:17-CV-1700-T-36TGW, 2017 WL 5899200, at \*3 (M.D. Fla. Nov. 30, 2017) (citing *Deckers v. Kenneth W. Rose, Inc.*, 592 F. Supp. 25, 28 (M.D. Fla. 1984)). Moreover, Mr. Veneziano's wife and children live in California. He obtained a driver's license and registered his vehicle in California. He opened a bank account in California and filed his taxes there. And, he is currently employed in California. That he pled guilty to a crime in Florida and still owns a small plot of land in Lee County does not outweigh the overwhelming evidence that Mr. Veneziano relocated to California in 2024 and established domicile there, long before removal on December 3, 2025. Plaintiffs have not presented any competence evidence that would tend to establish that Mr. Veneziano was residing in the State of Florida on December 3, 2025, or that he had an intent to return to Florida. The totality of the circumstances support a finding that Mr. Veneziano is citizen of California, and, as such complete diversity exists in this case. As such, Plaintiffs' Motion to Remand properly should be denied.

Respectfully submitted,

By: s/Susan V. Warner  
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Fla. Bar No. 38205  
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*Attorneys for Defendants*

### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 13th day of January, 2025 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached service list in the manner specified either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/Susan V. Warner  
Susan V. Warner

### **SERVICE LIST**

**OAKES FARMS, INC. et al. vs. STEVEN A. VENEZIANO, JR. et al.**  
**CASE NO: 2:25-cv-1126 -SPC-NPM**  
**United States District Court, Middle District of Florida**

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*Service via CM/ECF*

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION**

**OAKES FARMS, INC., OAKES  
FARM OP, LLC, and SOUTH  
FLORIDA PRODUCE, LLC,**

**CASE NO. 2:25-cv-1126 -SPC-NPM**

**Plaintiffs,**

**vs.**

**STEVEN A. VENEZIANO, JR.,  
individually, VENEZIANO  
FARMS, LLC, and VENEZIANO  
PROPERTY MANAGEMENT,  
LLC,**

**Defendants.**

\_\_\_\_\_ /

**SWORN DECLARATION OF STEVEN A. VENEZIANO, JR.**

I, Steven Veneziano, Jr., under penalty of perjury and pursuant to 28 U.S.C. § 1746, declare that the factual statements contained herein are made of my personal knowledge and are true and correct:

1. I am over the age of 18 and am otherwise *sui juris*.
2. I am a resident and citizen of the State of California, where I established residency and have been domiciled since November 8, 2024.
3. I left the State of Florida and abandoned my residence there on or about November 7, 2024. I have no intent to return to reside in the State of Florida.

4. In August 2025, I pled guilty in the Middle District of Florida to conspiracy to commit wire fraud and conspiracy to commit money laundering, Case No. 2:25-cr-0160-SPC-NPM, involving the U.S. Department of Agriculture's Coronavirus Food Assistance Program, which is part of a continuing fraud investigation involving Oakes Farms in Naples, Florida. I agreed to cooperate with the federal Government, and I am scheduled to be sentenced on March 23, 2026.

5. I have always kept the Government aware of my residence and where I was domiciled during my cooperation.

6. In November 2024, I moved to Cornado, California to join my family, who had previously moved to California on or about late August or early September 2024.

7. I did not initially get a California driver's license upon moving to California because I wanted to minimize public records of my residence as I feared for my life and my family's safety due to my cooperation with the Government in the aforementioned fraud investigation, which involved many individuals, including Francis A. "Alfie" Oakes, III, the principal owner of Oakes Farms.

8. In April 2025, with the Government's knowledge, I rented a room in a multi-family home in Bakersfield, California to obtain an address that I could use for myself and my wife to obtain driver's licenses and register our vehicles, as well

as for my wife to use for her nursing license, so that we could both obtain work in California.

9. In April 2025, I obtained a California driver's license using the Bakersfield address. When I applied for a California driver's license, I attempted to surrender my Florida driver's license to the State of California.

10. My vehicle was registered with the State of California in April 2025.

11. Upon obtaining a California driver's license and California vehicle registration, I began working in California and have been employed in California since that time.

12. I opened a bank account in California in May 2025. I hold no bank accounts in Florida.

13. I filed my 2024 U.S. Federal Tax Return in California. I did not file a state return in California because I did not earn any income in California in 2024. I was unemployed from November 7, 2024 until April 2025.

14. I have not registered to vote in California because I moved after the last Presidential Election, which occurred on November 5, 2024, and I knew that I was a convicted felon and thus unable to vote in California. To my knowledge, there were no elections between November 8, 2024 and August 2025 in California that I could have participated in.



15. I have not voted in Florida since I moved to California, nor would I be able to vote in Florida because of my status as a convicted felon.

16. 37 Diplomat Parkway West, Cape Coral, Florida 33993 is a 3,125 square foot vacant commercial lot that I purchased on or about December 20, 2019, via a Warranty Deed that was recorded at Instrument No. 2020000000303 of the Public Records of Collier County, Florida. A true and correct copy of the Lee County Property Appraiser Property Record Card for the 37 Diplomat Parkway lot is attached hereto as Exhibit 1. The lot remains vacant. I did not remember it existed or that I owned it until after seeing it listed in Plaintiffs' Motion for Remand.

17. I formed Veneziano Property Management, LLC on or about May 5, 2021 to hold and manage certain rental properties and other land holdings. All assets of Veneziano Property Management have been liquidated and sold and its bank account closed prior to 2025. I abandoned the entity, and it was administratively dissolved when I did not file an annual report in 2025. A true and correct copy of the Division of Corporations for the Florida Department of State corporate detail for Veneziano Property Management, LLC is attached hereto as Exhibit 2.

18. I formed Veneziano Farms, LLC on or about July 30, 2018 at the request of the principal owner of Oakes Farms, Alfie Oakes. A true and correct copy of the Division of Corporations for the Florida Department of State corporate detail for Veneziano Farms, LLC is attached hereto as Exhibit 3. Veneziano Farms was a

sham company that was involved in committing fraud since its inception and is related to the ongoing fraud investigation involving Oakes Farms. Veneziano Farms shut down and had its bank account closed prior to November 7, 2024. It was abandoned and administratively dissolved upon failure to file an annual report in 2025.

19. The only activity that occurred in the corporate filings for Veneziano Farms between November 2024 and its dissolution in September 2025 was that Steven J. Bracci resigned as the Registered Agent on June 13, 2025, which was done without my knowledge at the time. A true and correct copy of the Statement of Registration of Registered Agent is attached hereto as Exhibit 4.

20. Steven J. Bracci is an attorney, and he was the Registered Agent for Veneziano Farms. However, Mr. Bracci also is an attorney for Alfie Oakes, the principal owner of Oakes Farms. I did not contact Mr. Bracci after my relocation to California, as I feared that if I contacted him, he would share my location in California with Mr. Oakes or others.

21. After my wife and I relocated to California, we sold our prior home in Florida, which was located at 5567 Tamarind Ridge Drive, Naples, Florida 34119, on December 16, 2024, via a Warranty Deed that was recorded at Book 6422, Page 2080 of the Public Records of Collier County, Florida. I do not maintain any residence in the state of Florida.

22. I obtained an FAA third class private pilot's license in 2018. At that time, I was residing in Estero, Florida. I have not piloted any plane in over three years, nor have I had a FAA medical exam in seven years. As such, my FAA license is not current or valid.

23. To my knowledge, Suzannah Grob is an associate of Alfie Oakes. Ms. Grob's boyfriend is Ken Hartem, who is or was a straw owner of Farm Cut, LLC. Farm Cut, LLC was involved in my cooperation with the Government regarding the ongoing fraud investigation.

I hereby state, under penalty of perjury, that the foregoing facts are true and correct.

By:  \_\_\_\_\_  
Steven A. Veneziano, Jr.

Date: Jan 13, 2026  
\_\_\_\_\_

LEE COUNTY PROPERTY APPRAISER GENERATED ON 1/12/2026 2:01 PM		2025 Tax Roll		BUILDING CHARACTERISTICS				BUILDING SUBAREA DETAIL				FOLIO ID: 10043203 STRAP: 35-43-23-C3-02690.A240									
		ELEMENT		CODE		TYPE / DESCRIPTION / VALUE		AREA TYPE		YEAR		GROSS PCT		ADJ		CARD 1 of 1					

"Exhibit 1"



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## Detail by Entity Name

Florida Limited Liability Company  
VENEZIANO PROPERTY MANAGEMENT LLC

### Filing Information

Document Number	L21000209622
FEI/EIN Number	APPLIED FOR
Date Filed	05/05/2021
State	FL
Status	INACTIVE
Last Event	ADMIN DISSOLUTION FOR ANNUAL REPORT
Event Date Filed	09/26/2025
Event Effective Date	NONE

### Principal Address

5567 TAMARIND RIDGE DR.  
NAPLES, FL 34119

### Mailing Address

5567 TAMARIND RIDGE DR.  
NAPLES, FL 34119

### Registered Agent Name & Address

STEVEN J. BRACCI PA  
9015 STRADA STELL COURT  
SUITE 102  
NAPLES, FL 34109

Name Changed: 04/13/2023

Address Changed: 04/13/2023

### Authorized Person(s) Detail

#### **Name & Address**

Title AMBR

VENEZIANO, STEVEN A, JR.  
5567 TAMARIND RIDGE DR.  
NAPLES, FL 34119

Title AMBR

"Exhibit 2"

VENEZIANO, AMY M  
5567 TAMARIND RIDGE DR.  
NAPLES, FL 34119

Annual Reports

Report Year	Filed Date
2022	04/11/2022
2023	04/13/2023
2024	04/15/2024

Document Images

<a href="#">04/15/2024 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/13/2023 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/11/2022 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">05/05/2021 -- Florida Limited Liability</a>	<a href="#">View image in PDF format</a>



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## Detail by Entity Name

Florida Limited Liability Company  
VENEZIANO FARMS, LLC

### Filing Information

<b>Document Number</b>	L18000182613
<b>FEI/EIN Number</b>	83-1393948
<b>Date Filed</b>	07/30/2018
<b>State</b>	FL
<b>Status</b>	INACTIVE
<b>Last Event</b>	ADMIN DISSOLUTION FOR ANNUAL REPORT
<b>Event Date Filed</b>	09/26/2025
<b>Event Effective Date</b>	NONE

### Principal Address

5567 TAMARIND RIDGE DRIVE  
NAPLES, FL 34119

Changed: 04/06/2022

### Mailing Address

5567 TAMARIND RIDGE DRIVE  
NAPLES, FL 34119

Changed: 04/06/2022

### Registered Agent Name & Address

NONE  
Registered Agent Resigned: 06/13/2025

### Authorized Person(s) Detail

#### **Name & Address**

Title MGR

VENEZIANO, STEVE  
5567 TAMARIND RIDGE DRIVE  
NAPLES, FL 34119

### Annual Reports

Report Year	Filed Date	
2022	04/06/2022	"Exhibit 3"

2023	04/13/2023
2024	04/15/2024

Document Images

<a href="#">06/13/2025 -- Reg. Agent Resignation</a>	View image in PDF format
<a href="#">04/15/2024 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">04/13/2023 -- ANNUAL REPORT</a>	View image in PDF format
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L18000182613

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(City/State/Zip/Phone #)

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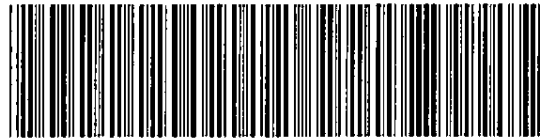
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"Exhibit 4"

## COVER LETTER

**TO:** Registration Section  
Division of Corporations

**SUBJECT:** VENEZIANO FARMS, LLC

\_\_\_\_\_  
Name of Limited Liability Company

**DOCUMENT NUMBER:** L18000182613

The enclosed Resignation of Registered Agent for a Limited Liability Company and fee are submitted for filing.

Please return all correspondence concerning this matter to the following:

STEVEN J. BRACCI

\_\_\_\_\_  
Name of Person

STEVEN J. BRACCI, PA

\_\_\_\_\_  
Name of Firm/Company

9015 STRADA STELL COURT, SUITE 102

\_\_\_\_\_  
Address

NAPLES, FL 34109

\_\_\_\_\_  
City/State and Zip Code

unknown

\_\_\_\_\_  
E-mail address: (to be used for future annual report notification)

For further information concerning this matter, please call:

STEVEN J. BRACCI

239

596-2635

at (

\_\_\_\_\_  
Name of Person

\_\_\_\_\_) Area Code

\_\_\_\_\_  
Daytime Telephone Number

Enclosed is a check made payable to the Florida Department of State for \$85.00 for an active limited liability company or \$25.00 for an administratively dissolved, voluntarily dissolved or withdrawn limited liability company.

**Mailing Address:**

Registration Section  
Division of Corporations  
P.O. Box 6327  
Tallahassee, FL 32314

**Street Address:**

Registration Section  
Division of Corporations  
The Centre of Tallahassee  
2415 N. Monroe Street, Suite 810  
Tallahassee, FL 32303

## STATEMENT OF RESIGNATION OF REGISTERED AGENT FOR A LIMITED LIABILITY COMPANY

Pursuant to the provisions of section 605.0115, Florida Statutes, the undersigned,

STEVEN J. BRACCI, PA \_\_\_\_\_, hereby resigns as

Name of Registered Agent

Registered Agent for VENEZIANO FARMS, LLC \_\_\_\_\_

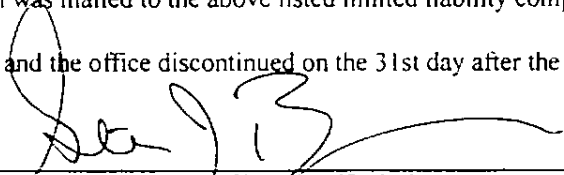
Name of Limited Liability Company

L18000182613 \_\_\_\_\_

Document Number, if known

A copy of this resignation was mailed to the above listed limited liability company at its last known address.

The agency is terminated and the office discontinued on the 31st day after the date on which this statement is filed.

  
\_\_\_\_\_  
Signature of Resigning Agent

If signing on behalf of an entity:

STEVEN J. BRACCI \_\_\_\_\_

Typed or Printed Name

PRESIDENT \_\_\_\_\_

Capacity

### **FILING FEES:**

\$ 85.00 Active limited liability company  
\$ 25.00 Administratively dissolved/ voluntarily dissolved/  
withdrawn limited liability company

Make checks payable to Florida Department of State and mail to:  
Division of Corporations  
P.O. Box 6327  
Tallahassee, FL 32314