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DRAFT SUMMARY (Not fully fleshed out)

9/2019	Purchase a retirement home in Bay Crossing a 55+ community, approx 2200 sq ft. Slab constructions. Our primary residence is in Blue Bell, PA (245 Bradford Cir, Blue Bell PA 19422), which is 120 miles and two hours away.	
middle 2021	Engage BKT (bathkitchenandtiles.com) to design and provide: cabinets, cabinet hardware, flooring, tiles. Also removing some pillars and walls, all non-weight bearing. Contract with BKT signed 10/2021.	can send
	BKT provides list of recommended contractors (Ian McCarty, owner, Coastal Home Experts LLC ("CH") at the top of the list).	document 02
	Engage Doug _____ a Structural Engineer to review site and scope to ensure that all removed components are not weight-bearing.	
Sept-Oct 2021	Several site visits by Ian of CH, reviewing the scope draft documents exchanged and reviewed.	
11/12/2021	Contract and Addendum signed w \$13,000 deposit.	document 03
	Ian tells us he is purchasing a home. In retrospect we believe he used our funds as a down payment.	
Fr 2/9/2022	Receive email from Ian that he's ready to start next week	document 04
Sat 2/10/2022	Meet w Ian to review site and scope with Ian. Provide second installment check of \$20,000.	
Tues 2/15/2022	"Start Date"--demolition begins. As per contract, job to be completed by 4/15/2022. Does not work on site 5 days a week as specified in contract.	
Early April	Attempt to contact Ian regarding delays and deadline. Only can reach his "assistant" Meredith.	
4/11/2022	sent email to Ian after site visit, photos taken	document 05
4/12/2022	receive the attached email and timeline from Ian. This is the last communication from Ian despite multiple emails, phone calls and text messages (many documented).	document 06
4/14/2022	BKT tells us that granite templating takes approx two months to schedule In attempt to mitigate delays, we schedule the template date for 5/26/2022, providing adequate margin for delays.	document 07
4/18/2022	send email response to Ian	document 08
4/15 - 4/30	minimal work done--max of 1-2 days/wk, 3 hours per day	
4/23/2022	send email to Ian, site visit, photos taken	document 09
5/2/2022	Send 1st Certified Letter and email	document 10

	Discover that Ian does not have a General Contractor license. Does have business license and general liability insurance.	
5/9/2022	Send 2nd Certified Letter and email to CEASE and DESIST and remove trailer from driveway.	document 11
5/11	CH does not accept either certified letter but does remove trailer on 5/11 (follows deadline in CEASE letter)	

- We have paid Ian \$33,000 out of a total of \$38,700 (85%). We believe he has done approximately 10-15% of the work.
- Several items have been done incorrectly. This includes cutting into the slab but putting in the wrong size drainpipe into the slab (1.5" instead of 2"), installing wall cabinets before wiring or painting is complete.
- Failed to properly protect several fixtures and window treatments, fireplace, new expensive fans damaged and covered in dust (proper protection was specified in contract),
- Rendered house unusable for the summer season.
- If we miss the templating date of 5/26/2022, the job will be delayed another two months.
- For each day past 4/15, the contract addendum states that will be a penalty of 1% per day, or \$387 per day.
- Contract addendum also shifts legal fees to the prevailing party.
- We have identified another contractor who is trying to get enough done for the templating, but the question of permits and other issues need to be reviewed. New contractor brought a licensed plumber to review site and verified that the new drain pump newly cemented into the slab by CHE is the wrong diameter and needs to be replaced (cutting into the slab a second time).
- Fails to maintain electric to refrigerators, wasting several hundred dollars of fridge and freezer food.
- Leaves on heat, lights when not there from 2/15 onward

DAMAGES

- Paid \$33,000, less than 10-15% of work done, now additional cost to rectify and complete job
- Loss of use of house after 4/15/2022
- Possible need to rent alternate residence for summer
- Cost of second contractor including additional cost for expedited plumber, electrician, trying to meet templating deadline
- Cleaning house
- Repairs to fan, other damages
- Refrigerator food
- Electric and heat left on
- Travel costs and lost time required to document and inspect, to send letters, etc
- Legal costs!



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Enclosures