

Addendum to Letter to Maryland State Legislators

There are references below to photos and attachments most of which are not included. These were all included in the complaint that was filed with the MHIC all of which were lost by the MHIC. I may be able to provide this evidence upon request.

Baltimore County Building inspectors have found numerous building code violations in the work done by Ovadia. Administrative Judge Beverungen confirmed these code violations in his Order.

Schemes. Sworn testimony in depositions in Ovadia's bankruptcy showed that he had concocted a scheme to use a friend's MHIC licenses when he was afraid of losing his license. He then had his wife start a home improvement license. There appears to be no legal remedy for contractors operating under other licenses of families and friends.

Advertising. I found Mr. Ovadia in an advertisement on Angies List, an online referral and advertising platform. On Angies list Ovadia represented himself as Ovadia Contracting, LLC. All of his listings were for this entity. This was not the business that he was licensed with the MHIC and with which I signed the contract which is Ovadia, LLC. This is a violation of MHIC rules. He also advertised on signs and online without his MHIC number listed, also in violation of MHIC rules. He was never cited for this in spite of evidence produced.

Lead Paint Certification and Failures. Before I signed a contract with Ovadia I asked him if he was licensed and certified for lead paint abatement as required on my older home when he worked at my house. I also asked him if he was certified for lead paint as his advertisement on Angies List shows. His listing there said that he was Lead Safe Certified by the EPA. Ovadia has testified under oath that he was in fact not certified by the EPA. (Ovadia deposition #2 pg. 281) The number he has listed as his EPA Certification on Angies List is actually a Maryland Dept. of Environment Lead Paint Visual Inspectors License number for Jerry Ovadia that is expired. (Attachment 7) Ovadia was cited by the EPA for violation of the regulations. This is also a violation of MHIC requirements. According to the MHIC website, "contractors doing maintenance or renovation work in an owner occupied pre-1978 dwelling unit, the contractors need to exercise safe lead work practices since they can generate lead contaminated dust." Clearly Ovadia did not do so.

Ovadia's sworn testimony that he had taken state lead inspectors courses and employed a lead inspection company for his rental properties proved that he was well aware of the requirements and concerns about lead paint. Records from the Maryland Department of the Environment (Attachment 7) that I obtained through an MPIA request clearly show that Ovadia was licensed as both a Lead Visual Inspector and Lead Contractor. Therefore he cannot claim that he did not understand the regulations regarding lead paint. He must have understood that his listing of EPA certification on Angies List using his MDE number was fraudulent. (Ovadia deposition #1, pgs. 16-23, 105-110) (Ovadia deposition #2, pages 279 – 282)

It appears that Ovadia has done work that disturbs lead paint without taking proper precautions and has not notified his customers as he should have been about lead paint hazards. He has been putting many families, as well as his workers, at risk for years. The hazards he may have created may still exist around Maryland and may be poisoning children, pets, and families to this day. Further Ovadia has been representing himself as EPA lead certified and using his expired MDE certification as an EPA license deceiving customers like me to think he is correctly licensed and to get them to hire him.

Ovadia has no doubt exposed numerous Maryland residents including me and my family to the serious dangers of lead paint.

Failure to Provide Information about Workers and Subcontractors Information about employees and subcontractors should have been provided by Ovadia and employees who have hired workers to the DLLR and An MPIA request that I made to the DLLR has revealed that the DLLR has no records of any employees of Ovadia. (Attachment 11) So it is clear that there is a question about Ovadia's adherence to the 2009 Workplace Fraud Act and other legal requirements such as the Personal Responsibility and Work Opportunity Reconciliation Act.

The MHIC refused to investigate Ovadia's use of under-the-table workers. They have never investigated the workers/subcontractors for Ovadia. I would guess that the same problems found on my job would be found in numerous other jobs that Ovadia has done. On my house he had unlicensed, uninsured, laborers and subs working.

If in fact he did as he claims, it is shocking that Mr. Ovadia would hire unskilled and virtually unknown laborers to work at my house unsupervised doing shoddy work. This is particularly concerning because this work was done while my family had moved out and there are many valuable and personal items in my house.

Abusive Treatment. On many occasions Ovadia was verbally abusive and disrespectful, yelling at me and my wife, calling me names, jabbing fingers at me, threatening me, pounding on tables and shouting so much that spittle would fly out of his mouth onto me. This behavior is confirmed by emails in which Ovadia apologized to me, by independent witnesses, and by an email from his attorney warning him to not yell when he met with me. (Attachment 11) Throughout the job he attempted to bully me into accepting his work and into paying me more money.

Working with Jerry Ovadia was extremely stressful and difficult. I do not think any customer should ever be treated the way he treated me and my wife. In my opinion this behavior alone should disqualify him from being a home improvement contractor in the State of Maryland.

Lack of Concern for Building Codes. Ovadia showed little concern for the building codes and little understanding of building codes. I have attached the judge's order and the County lists of code violations.

When I asked about the lack of access to the crawl space under the pantry that he built and that is a code violation Ovadia said, "There's no crawl space, I filled with dirt." I said that there needs to be access. Ovadia said, "Who said?" "I said that John Bryan head of Permits and Planning for Baltimore County says there must be access. Ovadia says, "Ok let him come and do it."

When I mention that it is also a code violation to have no ventilation for the same crawl space Ovadia told me that that was the way he always builds houses and he pulled out his cell phone and showed me picture after picture of foundations he built with no ventilation.

When I said that by code a splice in a beam needs to be over a post. Ovadia said, "That's another bullshit code."

When I pointed out to him the problem with the flashing of the ledger boards he seemed to believe that the code was wrong. In his opinion, because there is pressure treated lumber used for the ledgers it is not needed. When I talked to him about it he said, "You don't need to have flashing over the ledger board, its pressure treated" He believes that if, in his opinion, the code is wrong he can ignore it. Of course he does not understand that the purpose of the ledger flashing is not simply to protect the ledger board (which is likely the most important safety factor in deck construction), but, as the ICC states, "Inhibiting water damage to a structure from intrusion into the building envelope is of primary importance." After he received a correction notice from the County because of the incorrect flashing material Ovadia replaced 1/2 of the flashing on the rear decks with vinyl, but left the rest, and did not install any flashing on the front deck.

This example shows the danger of Ovadia's construction process. At the same time that he thinks he knows better than the building codes and can build however he wants, he clearly does not understand the code nor does he understand the basic principles of building construction. (See 3. #9 above)

This is further shown by the lack of the use of the sill plate or any other attachment to the foundation. This sill plate that was in the architect's plan and is shown in the ICC's illustrations of building construction, (Attachment 26, pg 143) was simply left out in his construction of my house. He claimed, when asked, that a sill plate wasn't needed.

When I asked about the ledger at the corner of the house and said that it is a code violation Ovadia responded, "If it was a violation Rodney [the initial inspector] would have cited it." I asked if he was not going to fix anything unless its cited by the building inspectors even if it is in the building code. Ovadia said, "I am not going to read it", meaning the code.

Not only does Ovadia not follow building codes but he purposely disregards them.

14. Lack of Concern for My House. I asked about the code violation for the lack of nosing on rear deck stairs. Ovadia says, "I will put plywood here 3/4 inch to make it." Saying that he will put plywood on top of the deck stairs to make a nosing. When I asked if that's the right way to do it. Ovadia said, "Who says." I asked, "How will it look?" Ovadia said, "Who cares."

I asked Ovadia, "What will you fix?" Ovadia said, "I'll fix whatever is important." I asked what that is. Ovadia said, "Whatever is a code violation." Then he said, "To be honest, I don't want to fix anything here."

When asked about the use of inferior aluminum stock as trim he said, "You did not tell me this was a custom job."

When I complained about the lack of framing on the inside of the front door he said, "Who cares, no one will notice."

15. The Contract. Ovadia failed to provide within the contract, or as an addendum to the contract, the following notices as required under Maryland Code § 9-108.01.26.

- (1) Formal mediation of disputes between homeowners and contractors is available through the Maryland Home Improvement Commission;
- (2) The Maryland Home Improvement Commission administers the Guaranty Fund, which may compensate homeowners for certain actual losses caused by acts or omissions of licensed contractors; and
- (3) A homeowner may request that a contractor purchase a performance bond for additional protection against losses not covered by the Guaranty Fund.

In Ovadia's deposition #2 pgs 174 – 175 he states that he did not know of these requirements.

16. Unwillingness to Repair Defects. At the time Ovadia walked off the job and since that time I have asked him to finish his work and repair the construction defects. At the time he walked off the job in May, 2012 he said that he would not do any further work until I made the final payments at a "final settlement".

Ovadia does not seem to follow the regulations of the MHIC in any respect whether its regarding advertising, contracts, or in any other way. He is not meeting the requirements of the MHIC regulations.

In my opinion the MHIC should not allow Jerry Ovadia, under any company or corporation, to be allowed to continue to do home improvement contracting in the State of Maryland. As shown by the work done on my house and statements that he has made, he is an imminent threat to the health and safety of the citizens of Maryland.

Homeowners in Maryland who are not as diligent and are not able to spend the necessary time and energy will likely never know of any hazards created by Ovadia's work.

Ovadia has produced many building code violations on my house. In my opinion he does not understand or does not respect building codes. He has admitted uses the same construction methods everywhere. He has admitted to illegal practices such as hiring under the table workers. The extent of the illegality of his operation is unknown without further investigation. As I have said, the MHIC should consider doing its own investigation and consider referring this case to investigative agencies such as the DLLR's Workplace Fraud Taskforce or the Commissioner of Labor and Industry.

Early on in my own investigations I noticed that the rim joists, which support the front bearing wall of the addition, were angled off of the foundation (See 3, #1 above). Ovadia tried to compensate for this error by patching some boards on to support it. He did this inadequate repair without consulting me or a structural engineer even though it is supporting a bearing wall. When I asked Ovadia about this problem during my investigations Ovadia said he did not know about it but would look into it. He never got back to me and never explained this problem. Clearly Ovadia and his carpenter knew about this problem, purposely hid it from me, and after I pointed it out to him he did nothing to correct it and showed no concern about the danger that might be created by this construction. He doesn't even acknowledge that it's a problem. There is a tremendous danger to the public of a contractor who knows about, but covers up and hides, serious building code violations and safety defects.

When Ovadia was questioned in the presence of the inspectors about the lack of connection of the subfloor to the walls (see 2. D above) he claimed that this is the way he always did this type of construction so that he could get all of his insulation done at the same time. He said that if the subfloor panels went down before building the walls, he would have to have the insulation for the floor space done before the walls were built and the insulation for the walls would thus have to be done at a different time. Therefore he did not ever attach the flooring to the walls in such a circumstance in order to save him the trouble and minor expense of doing insulation of the under floor space and the walls at different times. In my opinion this sort of construction method may threaten the structural integrity of every project that he has built in this way.

I believe that MHIC should investigate other projects that he has done. I am concerned that all over the State of Maryland there may be houses with serious construction defects built by Mr. Ovadia. Ovadia should be investigated about building practices that he has used on other projects.

As I said above, when I pointed out to Mr. Ovadia that by code he had to have ventilation and a crawl space under the floor of the addition he challenged that and pulled out his cell phone and flipped through numerous pictures where he said that he had never installed any ventilation in a crawl space and had done the work precisely as he had on my house. How many houses or additions have been built with these, and many other code violations? How many decks may have been built by Ovadia without correct attachment of deck ledger boards, the number one safety concern with deck construction?

Is it possible that this is the only house that he has done this sort of work? Is it possible that this is the only house that he will do this sort of work in the future?

Ovadia should be sanctioned for the work he had done at my house and he lose his license in order to prevent more work like this at other houses in the future.

The Most Serious Defects. In my opinion the most serious defects on this job known to date include the following:

- Use of 2" x 8" joists instead of required 2" x 12" joists for base framing of the addition that includes a cantilever
- Lack of any attachment of the addition to the foundation. No sill plates or fasteners of any kind.
- Footers for deck posts and other supports that do not meet code. Some as shallow as 6 inches and other problems with the footers.
- No connection of subflooring to walls. Gaps between subflooring and walls.
- Structural members constructed in contact with chimney in violation of code and creating a fire hazard.
- Insufficient support for a large ceiling beam installed in the living room.
- Insufficient and incorrect attachment of deck ledger boards. This is deck safety requirement #1.
- Lack of proper ventilation of ceilings/roofs.
- Lack of a crawl space and ventilation under the pantry.

2. Defects and Omissions in Work done by Ovadia. Below are listed construction defects and omissions should be investigated by the MHIC commission for work done improperly, and work not done, by Ovadia, LLC as well as other concerns that I have related to this work. This is not a complete list of all of the defects and omissions for the job done by Ovadia, LLC at 1336 Heather Hill Road

a. Failures in Adherence to Architect's Drawings. Ovadia did not follow the drawings/plans for the work submitted by Design Evolution Architecture and architect Ian Sokoloski for the construction without any agreement to do so and therefore he has abrogated the contract. These drawings are referred to in the contract for the work. There are numerous examples where Ovadia did not follow the architect's plans.

A copy of the drawings/plans are attached. (Attachment 2) I can supply a full architect's scale copy of the plans upon request or email a copy of the plans. Immediately below is a list of variances or omissions from the architect's drawings. In this list the first letter is for organization of this document, the letters and numbers that follow such as "A1.4" correspond to pages and reference numbers found in the architect's drawings.

A1.4, E1, & A5.2, E4 & E6 – 2" x 6" bearing plate at the cantilever doesn't exist. There is no apparent attachment of the addition to the foundation. There is no bearing or sill plate included in the construction per the architect's plan and standard building construction methods. The addition appears to simply rest on the foundations without any bolts or any other method of attachment to the foundation. One wall actually veers off the foundation. Code violation and safety hazard. (Attachment 20, #1A & B)

A1.4 - All floor joists and rim joists of addition to be 2" x 12". Instead of the 2" x 12" joists required in the architect's plans, Ovadia used 2" x 8" joists. (See Ovadia Deposition #1, pages 103 – 105, 138 – 147. Ovadia Deposition #2, pages 46 – 78 and 264 – 268. See Vlagogiannis Deposition, pages 75 – 89, and 190 – 193.) (Attachment 20, Page 1, d)

A5.2, E4 & E6 – $\frac{3}{4}$ inch plywood subfloor does not rest between joist and sole plate as outlined. Sub-floor plywood does not sit underneath the base plate of the exterior walls and interior bearing wall and not attached to rim joists or walls. There are large gaps between subfloor and joists and walls with subflooring extending up to 15 inches beyond the last supporting joist on east and west sides of addition. (Attachment 21, #10A)

A5.2, E4 & E6 – No MTL termite shields as per plans. (Attachment 20, #1B)

A5.2, E4 & E6 – No sole plate or anchor bolts attaching sole plate or any other part of the addition to the foundation. (Attachment 20, #1B)

A5.1, E1 - Most guard posts on decks notched and set inside edge of deck. Plan calls for no notching and posts on outside edge of deck. Most of the deck posts are notched at least 50% and some up to 75%. (Attachment 19, #1A & #2 A & B)

A3.1 – Meant to be $\frac{3}{4}$ inch joint filler at slab where it meets the wall of the house. Slab to slope to drain away from the house. No joint filler installed. Slab slopes to the house at the center of the slab with a depression in the center of the slab near the wall. (Attachment 21, #6B)

A5.1, D4 – Incorrect support for header for living room ceiling. Only one 2 x4 acting as support. Drawings call for 2 – 2"x4"s for support. One single 2" x 4" supports the header spanning the entire living room (19 feet) at one end. (Attachment 21, #8A & B)

A3.1, A5.2, E6. Front deck footer not built according to the plan. The front deck footer is less than 10 inches deep, not large enough, and is sloped at the bottom. (Attachment 21, #3A & B)

A1.2 - E1 - Blue stone landing required for steps. Gravel was used for landing at rear steps, mulch at front steps. (Attachment 21, #1B) (Attachment 21, page 1 #15)

A1.4 – 2" x 12" and 2" x 8" ledger. Installed 2" X 6" ledger for deck instead. Insufficient bolts installed. (Attachment 20, page 1, g) (Attachment 21, page 1, #16)

A3.1 & A5.2, E4, E6 – Poured concrete foundation not built according to plan. Built block foundation. (Attachment 20, #1B)

A2.2 - E1 - Paint existing parging. Not done. (Attachment 21, #4B)

A5.2 – Install Drain tile w/filter fabric and gravel at new foundation. Not done. (Attachment 21, page 1, #3) (Ovadia Deposition #2, pages 269 – 271)

A2.1 - Remove existing shutters. This was not done. (Attachment 21, #1A)

CS, General Conditions, 8. All material shall be new and of the highest quality, the quality of the workmanship shall be the finest and highest obtainable in each particular trade. Workmanship shall be satisfactory to the owner, and his decision as to the acceptable quality shall be final." Numerous visible beams, posts and joists showing knots and other deformities. H, Most wood provided is not high grade, particularly posts, joists, rim joists etc. Workmanship was not acceptable. There are numerous examples of poor workmanship and poor materials. Add Photos if keep this item.

A1.4, E5. Ceiling joists in pantry to be 2" x 10" by plan but they are 2" x 8". Roof structure and soffit for pantry not built according to architects plan. Joists end at header blocking ventilation under roof. (Attachment 21, page 1, #10.) (Attachment 20, #7B)

A1.3, 11. Subfloor to be glued and nailed per manufacturers specifications. Durock sheets were glued to subfloor using incorrect material, i.e. Liquid Nails Heavy Duty Adhesive. (See the email in Attachment 12. In this email Ovadia states how he has constructed the floor.) According to the manufacturer, LN Heavy Duty is not an appropriate adhesive for attaching Durock to subfloor. (See the letter from manufacturer Azko Nobel and the Installation Guide for Durock also in Attachment 12.) According to the manufacturer Durock is

supposed to be laid in a bed of adhesive laid with a trowel. Azko Nobel, the Manufacturer of Liquid Nails says the "Heavy Duty" product is not meant to be used to secure floor panels.

3. Construction Defects and Omissions. There are numerous construction defects and omissions on the job. They are listed below.

1. Rim joists on front of addition angle out off the side of the foundation. The rim joists while supporting a bearing wall, do not sit directly on the foundation. Of course they are not on a sill plate either as there is no sill plate. (Attachment 20, #1B)
2. Ledger boards are not attached properly on front deck. There is no staggered bolt pattern. Also the bolts are inside of 2 inches from the edge of the ledger boards and rim joist. (Attachment 21, page 1, #4)
3. No ventilation for space under pantry. (Attachment 20, #1B)
4. No minimum 18" crawl space under pantry. (Attachment 20, #1B)
5. No access for crawl space under pantry. (Attachment 20, #1B)
6. Kitchen mid-wall joists and top plate notched without proper metal tie. (Attachment 4)
7. Kitchen wall studs not continuous from base plate to top plate. (Attachment 4)
8. No flashing of ledger boards of front deck and incorrect flashing on part of rear deck. (Attachment 21, #2A) (Attachment 18, # 5A & #5B)
9. Ventilation for kitchen roof insufficient. Insulation blocks ventilation from soffits. (Attachment 21, page 1, #10)
10. Missing joist hangers and nails in joist hangers. (Attachment 4)
11. Most joists are not seated properly in their hangers. According to Simpson Strong Tie (the hanger manufacturer) and their specifications, "Joist shall bear completely on the hanger seat..." Photos show gaps between joists and hanger seats and a few attempts to fill gaps with shims at the time of construction. (See attached Simpson Strong Tie, Important Information and General Notes, General Instructions for Installers, letter 'o' and accompanying email from Simpson Strong Tie in Attachment 13) (See Vlagogannis Deposition, pages 153, 154.) (Attachment 20, #8B)
12. Some joists are further away than 1/8 inch from the beam or ledger board they are attached to as required by the manufacturer. According to Simpson Strong Tie (the hanger manufacturer) and their specifications, "...the gap between the joist end and the header shall not exceed 1/8 inch..." Photos show gaps between joists and headers. (See attached Simpson Strong Tie, Important Information and General Notes, General Instructions for Installers, letter o and accompanying email from Simpson Strong Tie in Attachment 13) (Attachment 20, #5A & B)
13. Ledger boards are not attached properly on rear deck. No staggered bolt pattern. In 8 bays between 16" on center joists which could be examined there are a total of only bolts. On the narrow section of the deck the last bolt before end of a ledger is over 30" from the end of the ledger. (Attachment 18, #5B) (Attachment 20, #7A)
14. Insufficient beam below addition. Splices in beams are in mid span and not over posts. (Attachment 18, #2A) (Attachment 19, #3B) Footers for the beam posts below addition are not level or deep enough. (Attachment 20, #2B)
15. Beam splice not over post on rear deck. (Attachment 19, 4A)
16. Handrails on front and rear decks are incorrect size. H4

17. Tread spacing inconsistent on front deck steps. H4
18. Stair landing has 2" x 4" board turned face down and acting as a supporting joist. This 2" x 4" also is cut and not hung with a joist hanger. H
19. Holes on posts drilled in the wrong place on back deck. Holes filled with dowels and some sort of
20. green glue. (See Vlagogannis Deposition, pages 109, 110) (Heyn,*1, #21)
21. Bolts for notched posts close to edge of posts. Some within ½" of edge. Architect's design calls for no notched posts. H4
22. Insufficient or no nailing of base plates of walls to joists in addition. No visible nailing of base plates to joists where walls have been removed for investigation. In lengths as much as 32 inches there is no appearance of any nails. H4
23. Gaps around door latch hardware in front door. (Attachment 23, #7A)
24. Bolts over tightened .
25. Deck guard post warped. H4
26. Screened porch "Dry Snap" system leaks through light fixture, at edges and at interior guttering. Water drips onto porch floor and puddles on porch. Screened porch was meant to be dry below deck. Light fixture rusted. Incorrect flashing material for Dry Snap system, not compatible with pressure treated lumber so it will degrade quickly over time. Also there are gaps between flashing and wood. (Heyn,*1, #7A, 12B)(Attachment 23, #6A)
27. Footer for front deck stairs is not deep enough. H4
28. Footer for back lower deck stairs is not deep enough. (Attachment 24, #4A)
29. 2" x 4" framing for screens on screen porch installed improperly. Inconsistent installation design. For
30. example in one case a single 8 foot vertical 2" x 4" is pieced together with 4 pieces of 2" x 4" making up the length instead of using a single piece of wood. Some horizontal 2" x 4"s butted to the 2" x 4"s on the side some extend all the way to the posts. (Attachment 22, #20B) H4
31. Screening on porch improperly framed. Screen framing not miter joined and goes outside porch posts and joists. Not flush with posts, allows water to get in. (Attachment 22, #11A)
32. Screen door hung improperly, shimmed and scrapes on floor. (Attachment 22, #9B)
33. Screening on the porch was improperly installed. Some is flush with the inside of the porch framing some is flush with the outside. Porch screening meant to be aligned with the outside of the porch. Stairs were installed before the screening making it impossible to install screening on the outside in the area of the stairs. As Vlagogannis testified, "the stairs were in the way". When I complained about the screening being on the inside Ovdia changed some of the screening and some screening ended up inside and some ended up outside. (Vlagogannis Deposition, pages 55 – 59) (Attachment 22, #11B, #12A)(Attachment 23, #5B)
34. Excessive and inconsistent gaps between deck boards at sides and ends. Some gaps are over ½ inch. (Attachment 22, #3B)
35. Excessive and inconsistent gaps at posts where posts meet decking. (Attachment 22, #7B)
36. Railing along long narrow portion of deck is crooked. (Attachment 22, #4B)
37. Rim joist cut short and glued back together on northeast side of deck. Part of reattached piece has
38. fallen out leaving a gap. In sworn testimony carpenter has agreed that he cut the beam short and glued the piece back in. (Ovdia Deposition #2, pages 221-224) (Vlagogannis Deposition, pages 61 – 63 and 141) (Attachment 22, #8A)

39. Sliding glass door set back from outside wall. Is inconsistent with other sliding glass door which is flush with outside wall. Also setting back the door created a 7" sill that holds water. Wide sill creates drainage and moisture problem. (Attachment 23, #8B)
40. Crooked deck stairs back deck. First flight of deck stairs angles away from deck. Poor workmanship. Top board at top of deck stairs on back deck angled to match crooked stairs. (Attachment 22, #8B, #9A)
41. Decking boards mainly nailed instead of screwed, not predrilled, excessive nailing, nails driven too deep, and nailed too close to edges of boards causing cracking of deck boards and unsightly appearance. (Attachment 22, #3A, #6B)
42. Deck boards curve up at the edges so water pools on deck boards. (Attachment 22, #22A)
43. Bolts stick out up to 3 inches on the outside of the deck beam at stairs and in other areas. Irregular bolting pattern. (Attachment 22, #2B)(Attachment 23, #5A)
44. Mixed use of screws and nails attaching balusters on front porch. Wood not pre-drilled for screws and too close to the end. Wood crushed and split. (Attachment 23, #4B)
45. Cracks throughout kitchen floor. H4
46. Lighting system and its controls for living, dining room, and kitchen not functioning properly. 3 lighting system control panels not working. No coordination of systems. (Attachment 5) H4
47. Master light panels not level.
48. Kitchen cabinet drawer has a random drill hole in it. (Vlagogannis Deposition, pages 106, 107) H4
49. Hole in bedroom wall made by electrician when installing conduit outside back bedroom. Hole needs to be repaired, walls painted. (Attachment 23, #6B)
50. Uneven floor between kitchen and dining area. Kitchen floor higher than dining room floor. (Vlagogannis Deposition, pages 69 - 70, 99 - 101) (Attachment 22, #20A)
51. Baseboard in kitchen, dining, and living room areas not installed. H4
52. Kitchen valence lights, uplights, not installed as in electrical design. (Attachment 5) H4
53. Exterior front and pantry exterior doors have oil stains around the door knobs making them unfinishable. Need to replace doors. (Heyn*, #16A)
54. Trim inside closet door in living room not installed. (Attachment 22, #14A, #14B)
55. Baseboard trim in living room has bad miter joint leaving a gap. (Attachment 22, #22B)
56. Drywall on basement ceiling finished poorly with ridges and bumps. H
57. . Mixed use of screws and nails on deck flooring. H4
58. Pantry shelves unsightly. Unfinished edges and ends. (Attachment 22, #19B)
59. Front door trim missing on side of front door. Door hinges set inside drywall. (Vlagogannis Deposition, page 133) (Attachment 22, #16B)
60. Bad cuts in base cabinets in kitchen. Visible cuts in cabinets. (Attachment 22, #19A)

61. Kitchen Cabinets installed upside down causing the closing devices to be at the bottom of the cabinet. (Attachment 22, #17B, #18A)
62. Living/dining room walls and ceiling need painting.
63. Insufficient and incorrect ledger attachments at addition where it attaches to house rim joist. No bolts or not enough bolts, not attached in correct spacing and pattern. No apparent attachment of kitchen addition ledger board/rim joist to the foundation of house where addition meets house at opening to dining room. H4
64. Joists and beams not resting directly on supporting posts. H4
65. Insufficient or missing bolts supporting rear stair landing. H4
66. Incorrect construction on south side corner section of deck. There is a single beam for unsupported ledger extending out from the side of the house. Single ledger for large back deck extended beyond the corner of the house and supported only by attachment to beam that is built incorrectly. Baltimore County Deck Construction Guide says "Warning: Do not attach deck ledger to overhanging floor system" (Attachment 24, #6B, #8A)
67. Improper cut through plates with incorrect strapping where vent pipe goes through in south kitchen wall. Code violation. (Attachment 28, #15) (Photo 70, 70A) (Attachment 18)
68. Large gaps where deck railings meet walls. (Attachment 22, #4A)
69. Uneven and unsightly nailing on outside of deck joists. Excessive nailing and irregular nailing. Poor workmanship. (Attachment 23, #4A)
70. Ledger boards for front deck are insufficient. Requires a minimum of 8". Installed are 6". H4
71. Deck post bolt within ½ inch of the edge of the post. H4
72. Unfinished soffits are missing "J" channel at the wall. H4
73. Oil stain around front and pantry exterior door knobs apparently from oil in knob mechanisms being transferred to doors during installation. (Attachment 22, #16A)
74. Knobs for patio screened door mounted improperly. They extend beyond the wood frame hanging over the edge. Poor workmanship, unsightly. H4
75. Latches for sliding screens not attached to new sliding glass doors installed by Ovadia. H4
76. Under cabinet lighting in kitchen is not installed properly. Needs repair.
77. Footers for deck support posts in rear not poured properly. They include construction debris such as bricks, are not deep or wide enough, and have voids within them. Footers cannot contain bricks or other debris. Footers cannot have holes in them. (Attachment 24, #3A & #3B)
78. Slab for the screened porch is poured improperly. Slab has voids underneath and is not consistent and even and does not sit on the ground. H4
79. Screening hanging loose off of screen doors and doors falling apart. H4
80. Horizontal kitchen cabinet handles not level, vertical kitchen cabinet handles not plumb to vertical. (Vlagogannis Deposition, pages 101 – 103) (Attachment 22, #17A) (Email in Attachment 11 shows discussion about cabinet handles and promise to fix by Ovadia)
81. Framing members are less than 2" from the chimney including in the living room wall, the ceiling and walls in the pantry and kitchen, and the floor in the pantry and kitchen. Code violation. H4

82. Poor and uneven workmanship at foundation corner. (Attachment 24, #6A)

83. Insufficient nosing for deck stairs at the rear deck. H4

84. There is no evidence of appropriate flashing being applied to windows, walls, and door frames as required. H4