

**Orion Investment and Management Ltd. Corp.**

200 S Biscayne Blvd, Seventh Floor

Miami, Florida 33131-5310

**June 18, 2025**

**To: The Accessibility Advisory Council, Florida Building Commission**

**Re: Landlord Position on Proposed Elevator Addition – Cactus Club Cafe, Miami Beach**

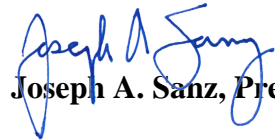
Dear Members of the Accessibility Advisory Council,

As the Landlord of the property at which the proposed Cactus Club Cafe is located, Orion Investment and Management Ltd. Corp. formally submits this letter in support of the tenant's waiver request to forego vertical accessibility to the mezzanine level.

We do not support the addition of an elevator due to the substantial structural and envelope modifications that would be required to accommodate vertical transportation in this specific location. The proposed work includes major interventions to the building's foundation, load-bearing elements, and roof structure elements which are integral to the stability and integrity of this century-old building.

These modifications would not only present considerable construction challenges, but also pose long-term risks to the physical condition and architectural character of the building. Roof penetrations, foundation work, and alterations to exterior elevations required for the elevator shaft and overrun represent a fundamental disruption to the building envelope and would introduce permanent impacts beyond the localized scope of the tenant's space. For these reasons, we respectfully urge the Council to support the waiver request.

Sincerely,



**Joseph A. Sanz, President**

On behalf of

**Orion Investment and Management Ltd. Corp.**