

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

MOLIERE DIMANCHE

Plaintiff Case No. 6:25-cv-02255-CEM-LHP

VS.

HEATHER PINDER-RODRIGUEZ, NINTH JUDICIAL CIRCUIT IN AND FOR
ORANGE COUNTY FLORIDA as an Enterprise, , STATE OF FLORIDA,
UNITED STATES OF AMERICA, CITY OF ORLANDO, ORANGE COUNTY,
LOWNDES DROSDICK DOSTER KANTOR & REED P.A., JULIA L. FREY,
BILL DYMOND, LAUREN FREY-HAMNER, LOU FREY INSTITUTE, JAMES
WALSON, DAVID CARTER, DAVID CARTER PSY. D PLLC, EMERSON R.
THOMPSON, MARK BLECHMAN, ANDREW EDWARDS, RICHARD I.
WALLSH, MONIQUE H. WORRELL, LUIS CALDERON, PHIL DIAMOND,
ORANGE COUNTY COMPTROLLER, AMY MERCADO, ORANGE COUNTY
PROPERTY APPRAISER, TROY STICKLE, TAKELA JACKSON, RABIH
TABBARA, OFFICER JOHN DOE #1, OFFICER JOHN DOE #2, RICHARD
CARPENTER, OFFICER JANE DOE, JANE DOE #2, STEVE BRENTON,
NICOLAS LUCIANO MONTES, DAVID PEREZ, ANTONIO VARGAS,
DEBORAH BRADLEY, TERRI WILSON, ROSE ACOSTA, JOHN BEAMER,

MELISSA GEIST, JESSICA LEBELLE, TARLIKA NUNEZ-NAVARRO, ADAM CORTES, OFFICER CORTES, AARON GOSS, BRENT FELLOWS, DAVID ALBAN, OFFICER JOHN DOE #3, OFFICER JOHN DOE #4, DANIEL MANGANELLO, STEPHANIE HERDOCIA, MICHAEL MASSICOTTE, JOHN HUGH DYER, LAURIE NOSSAIR, KATHERINE COLLIE, RYAN SMITH, JOHN MINA, KORENE HINDS, ERIC SMITH, SALEENA SINGH, TIFFANY MOORE RUSSELL, HANNY D., ROCHELLE K., APRIL M. MCCONNELL, DWAIN RIVERS, CHRISTOPHER CARTY, BLAN TEAGLE, ROGER HANDBERG, GEORGE MANGRUM, ROGER J. MCDONALD, CHERYL ANDERSON, ANIL SRIVASTAVA, JANET GONZALES, SUZANNE TRIMBLE, KAYLE BORDERS, CARLOS E. MENDOZA, TIMOTHY CORRIGAN, A. JAMES CRANER, NICK SHANNIN, JUDAH MANDEL, JEN-HSUN HUANG, LARRY EVANS, CHRISTOPHER GREY, CHRISTOPHER WACKES, RAYMOND DOMINIC, DAVID L. REDFEARN, MICHAEL PICCOLO, ERIC DUBOIS, JEFF ASHTON, KARISSA CHIN-DUNCAN, ANGELA ALVAREZ, KAREN WONSETLER, LORIE LUCAS, DANIEL IRICK, ESTRELLA MELIANS, KATHRYN SMITH, ALICIA L. LATIMORE, BRIAN STOKES, BILL COWLES, SHANNIN LAW FIRM P.A., MANDEL LAW PLLC, KATHRYN SMITH LAW FIRM, WONSETLER & WEBNER P.A., EASTWOOD COMMUNITY ASSOCIATION INC., EXTREME MANAGEMENT TEAM, LAKEVIEW LOAN SERVICING LLC, PONDVIEW PROPERTIES, RAFAEL

SALADO, REVERSE MORTGAGE FUNDING LLC, HERITAGE FLORIDA
JEWISH NEWS, IDEA CAPITAL GROUP INC. D/B/A ICG INC., FLORIDA
DEPARTMENT OF CORRECTIONS, ORANGE COUNTY SHERIFF'S OFFICE,
STATE ATTORNEY'S OFFICE, PUBLIC DEFENDER'S OFFICE

Defendants.

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JURY TRIAL DEMANDED

VERIFIED COMPLAINT

This is an action against the Defendants in their individual capacities.

Plaintiff Moliere Dimanche (“Dimanche”)/“Plaintiff”) hereby alleges, as and for his Complaint against Defendants Heather Pinder-Rodriguez (“Pinder-Rodriguez”), Julia L. Frey (“Frey”), Bill Dymond (“Dymond/Comptroller”), Amy Mercado (“Mercado/ Property Appraiser”), Troy Stickle (“Stickle”), Takela Jackson (“Jackson”), Rabih Tabbara (“Tabbara”), John Doe #1 (“Doe #1”), John Doe #2 (“Doe #2”), Richard Carpenter (“Carpenter”), Jane Doe (“Jane”), Jane Doe #2 (“Jane 2”), Nicholas Luciano Montes (“Montes”), David Perez (“Perez”), Antonio Vargas (“Vargas”), Deborah Bradley (“Bradley”), Terri Wilson (“Wilson”), Rose Acosta (“Acosta”), John Beamer (“Beamer”), Melissa Geist (“Geist”), Jessica LeBelle (“LeBelle”), Tarlika Nunez-Navarro (“Navarro”), Adam Cortes (“Cortes”), Officer Cortes (“Cortes 2”), Aaron Goss (“Goss”) Brent Fellows (“Fellows”), Steve Brenton (“Brenton”), David Alban (“Alban”), Daniel Manganiello

(“Manganiello”), Michael Massicotte (“Massicotte”), Stephanie Herdicia (“Herdicia”), John Hugh Dyer (“Dyer”), Laurie Nossair (“Nossair”), Katherine Collie (“Collie”), Ryan Smith (“Smith”), John Mina (“Mina”), Korene Hinds (“Hinds”), Eric Smith (“Chief Smith”), John Doe #3 (“Doe #3”), Saleena Singh (“Singh”), Tiffany Moore Russell (“Russell”), Hanny D. (“Hand”), Rochelle K. (“Rochelle”), April McConnell (“McConnell”), Dwain Rivers (“Rivers”), Christopher Carty (“Carty”), Roger Handberg (“Handberg”), George Mangrum (“Mangrum”), Roger J. McDonald (“McDonald”), Cheryl Anderson (“Anderson”), Anil Srivastava (“Srivastava”), Janet Gonzales (“Gonzales”), Julie Sneed (“Sneed”), Suzanne Trimble (“Trimble”), Kayle Borders (“Borders”), Carlos Mendoza (“Mendoza”), Timothy Corrigan (“Corrigan”), A. James Craner (“Craner”), Nick Shannin (“Shannin”), Judah Mandel (“Mandel”), Jen-Hsun Huang (“Huang”), Larry Evans (“Evans”), Christopher Grey (“Grey”), Christopher Wackes (“Wackes”), Raymond Dominic (“Dominic”), David L. Redfearn (“Redfearn”), Michael Piccolo (“Piccolo”), Jeff Ashton (“Ashton”), Karissa Chin-Duncan (“Chin-Duncan”), Angela Alvarez (“Alvarez”), Karen Wonsetler (“Wonsetler”), Lorie Lucas (“Lucas”), Daniel Irick (“Irick”), Estrella Melians (“Melians”), Kathryn Smith (“K. Smith”), State of Florida (“Florida”), United States of America (“United States”), Alicia Latimore (“Latimore”), Brian Stokes (“Stokes”), Bill Cowles (“Cowles”), Lauren Frey-Hamner (“Hamner”), James Walson (“Walson”), David Carter (“Carter”), Carter Psy.d, Pllc (“Carter Psy”),

Emerson R. Thompson (“Thompson”), Mark Blechman (“Blechman”), Andrew Edwards (“Edwards”), Richard I. Wallsh (“Wallsh”), Andrew Bain (“Bain”), Monique H. Worrell, (“Worrell”), Luis Calderon (“Calderon”), City of Orlando (“City”), Phil Diamond (“Diamond”), Lowndes, Drosdick, Doster, Kantor & Reed, P.A., Shannin Law Firm P.A. (Shannin Law”), Mandel Law PLLC (“Mandel Law”), Kathryn Smith Law Firm (“Smith Law”), Wonsetler & Webner P.A., Eastwood Community Association Inc. (“Eastwood”), Extreme Management Team, Lakeview Loan Servicing LLC (“Lakeview”), Pondview Properties (“Pondview”), Reverse Mortgage Funding LLC (“RMF”), Heritage Florida Jewish News, IDEA Capital Group Inc. d/b/a ICG Inc. (“ICG”), Florida Department of Corrections (“FDOC”), Orange County Sheriff’s Office (“OCSO”), State Attorney’s Office (“SAO”), Public Defender’s Office (“PD”) (together with Lowndes and Carter Psy, “Defendant Corporations,” and together with all afore-mentioned individuals, “Defendants”) as follows:

PRELIMINARY STATEMENT

Plaintiff Moliere Dimanche, pro se, files this Verified Complaint against Defendants, alleging a 17-year conspiracy orchestrated by the State of Florida and its agents to dehumanize Plaintiff and nullify his fundamental rights under the United States Constitution, to wit: Amendments 1, 4, 5, 6, 8, 14, and Florida Constitution Article I §§ 2, 9, 14, 16 and Article X § 4. Commencing with a void 2008 conviction that tainted Plaintiff’s legal status, the conspiracy evolved through

falsified documents and transcripts, fraudulent property seizures, biased judicial proceedings, and predatory foreclosures, stripping liberty, property, human rights and homestead protections. This action seeks to void the root conviction, unwind the chain of harms, and award full remedies. Despite his efforts to correct these wrongs, which are rooted in the illegal mismanagement of Dimanche's legal status and status as a human being, the collective efforts continue with even more damage to his human status, good name, and reputation by way of systemic conflicts of interest, deprivation of due process and the weaponization of statutes that are unconstitutional and discriminatory with the intent to continue this system permanently. Immediate action is necessary to restore Plaintiff's dignity, reputation and fundamental rights.

As an American citizen and permanent resident of the State of Florida, Plaintiff was born with a set entitlement to the rights guaranteed under the respective Constitutions of both the state and the country. The Constitution of the United States, while not initially designed to afford the Plaintiff the rights he expects today, has reflected upon itself since its inception and done its best to recognize the Plaintiff as a human being. The State of Florida's statutes, which are among the best in this nation, go a step further and extends remedies to those who are poor and without wealth. However, systemic obstruction of the intent of the laws of this state and country prevent Plaintiff from access thereto.

One of the most important remedies the State of Florida has in place is its adverse possession process outlined in Chapter 95 of the Florida Statutes. Anticipating the need for every American to have a Homestead, which is rooted in the United States Constitution's guarantee to the right to the Pursuit of Happiness, Chapter 95 affords Floridians with the ability to pursue Happiness with the bare minimum. Unfortunately, there is a systemic unjust enrichment scheme that plagues this State and inherently introduces illegal obstacles to the Pursuit of Happiness, so that greedy individuals and entities may unjustly enrich themselves to the detriment of those who look to the Florida Statutes for guidance.

This practice is inherently unConstitutional, and combined with the systemic approach to the development of a caste system that determines who may and may not access the Courts through the unConstitutional statute §68.093, the Pursuit of Happiness is all but foreclosed on the Floridian Americans who are born Black, poor, and only have the guidance of the Constitutions to navigate their lives in the United States of America.

Under the caste system, participation in elections are unattainable, challenges to election interference are unattainable, property acquisition is unattainable, the right to have a jury decide facts are unattainable, maintaining a good name is impossible, and citizenship has virtually no benefit at all.

This Court has federal question jurisdiction under 28 U.S.C. § 1331 and supplemental jurisdiction under 28 U.S.C. § 1367.

JURISDICTION AND VENUE

This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1343 because this action arises under the United States Constitution, 42 U.S.C. § 1983, and Title IX.

This Court has personal jurisdiction over Defendants, and venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (e), because Defendants are public officials in the State of Florida, are sued in their official capacities, and certain Defendants maintain their principal headquarters in this District. Defendants reside within this District and/or perform official duties within Florida.

There is an actual and justiciable controversy between Plaintiffs and Defendants because §68.093 constitutes an immediate infringement on the constitutional and statutory rights of Plaintiff.

This Court has jurisdiction of this action under 28 U.S.C. § 1331 and supplemental jurisdiction under 28 U.S.C. § 1367. Further, this Court has:

- 28 USC §1367 - Supplemental Jurisdiction
- 28 USC §1331 - Federal Question Jurisdiction
- 28 USC §1343(a) - Civil Rights and Elective Franchise Jurisdiction
- 28 USC §1344 - Election Disputes Jurisdiction
- 28 USC §1356 - Seizures Not Within Admiralty and Maritime Jurisdiction
- 28 USC §1357 - Injuries Under Federal Law Jurisdiction
- 28 USC §1361 - Compel United States Officer to Perform his Duty Jurisdiction

PARTIES

I. Plaintiff

1. Plaintiff is an American citizen and resident of the State of Florida, father, political candidate with aspirations to serve his fellow Americans, and belongs to a protected minority class, and who has been harmed by a series of conspiracies, systemic oppression and unConstitutional statutes at the fault of the Defendants, collectively.
2. Moliere Dimanche. Plaintiff Moliere Dimanche is a Black, Haitian-American resident of the State of Florida. After being falsely imprisoned by the State of Florida for a crime for which he was not found guilty nor convicted, Grand Theft Second Degree, he sought to reclaim his life through higher education, creative work, securing a homestead, raising a family, and seek elective office in order to help prevent the injustices that have happened to him from happening to others. He brings this action in his own capacity, and if at all possible, to avail the rights and privileges of those belonging to the same class as himself.
3. In furtherance of his goal to enjoy the rights he is entitled to, Moliere Dimanche has initiated litigation, successfully and unsuccessfully, to help others similarly situated enjoy the rights and privileges they

expect. Those rights include the right to Free Speech, protection from retaliation, the right to hold public office, and the right to inclusion in local politics.

4. As a person without a privileged upbringing, Moliere Dimanche has been met with disparaging titles cast upon him due to his Pursuit of Happiness. He has been called a “squatter” in legal filings and during court hearings, he has been called a “known fraudster” in filings by attorneys, “the pro se” by court staff, and much more, all due to his status in the caste system.
5. Moliere Dimanche has never committed fraud in his life, is not a “squatter”, and has only ever pursued the statutory process outlined in Chapter 95 in good faith and under the guidance of the laws of this state. While the Plaintiff has proceeded in legal actions pro se, that title has its place in the caste system to remind him that he is lesser than anyone else.
6. Moliere Dimanche has run for office in the City of Orlando, only to be terrorized by police under the threat of violence, and under the guise of a fake 911 call, while engaging Black voters in a predominantly Black part of town while running for Mayor, and to have his check for a qualifying fee in the District 5 Commissioner’s race thrown into a lobby and left there overnight.

7. As an unwilling member of the bottom of the caste system, Moliere Dimanche cannot run for, nor hold public office, and his legal challenges to the illegal obstacle are never allowed to proceed to a jury. His legal challenges to assert that he is more than 1/5 of a man and an American have been called frivolous without justification, and only cast him deeper into the caste system wherein all of his rights have been nullified.
8. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche has been falsely imprisoned in the Florida Department of Corrections without justification, and with resistance to his contests for his freedom met with the falsification of documents in order to justify both the false imprisonment, and his place in the caste system.
9. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche has had property taken away from him by way of an illegal writ of habeas corpus issued for his arrest and a subsequent extortion wherein he was directed by state officials to dismiss 2 legal challenges in both the 6th DCA and the 11th Circuit Court of Appeals before the writ of habeas corpus would be recalled.
10. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche has had property taken from him by law enforcement officers without a warrant, and turned over to another person in a

racially motivated transfer of possession facilitated by the Orlando police department.

11. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche has been kidnapped and transferred for miles to prevent him from defending his property.
12. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche has been held in the Orange County jail under a fraudulent and made-up court case number in order to prevent him from defending his property.
13. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche a judge issued a warrant for his arrest after he had already bonded out of jail for the fraudulent court case, in order to cover up that Moliere Dimanche had been kidnapped and falsely imprisoned under the fake court case at all.
14. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche has had his identity stolen to advance a scheme to unjustly enrich lawyers and judges through the claim of a mortgage surplus, without consequence for the individuals involved.
15. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche had his identity stolen a second time during an investigation by the Florida Bar, only to be told by the Bar that the attorney who

stole his identity could not be prosecuted under the reasonable doubt standard. That attorney stole Moliere Dimanche's identity during the Bar investigation and submitted the product of this theft directly to the Florida Bar.

16. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche has fallen victim to unjust enrichment scheme after unjust enrichment scheme to usurp his homestead, with scam foreclosure proceedings, a fraudulent lien on the property for "attorneys fees", and a scheme to accelerate the foreclosure proceedings on the basis on Moliere Dimanche's position in the caste system.
17. At the bottom of Defendant State of Florida's caste system, Moliere Dimanche has had his right to access to courts nullified by the pattern and practice of seeking the taking of judicial notice of his position in the caste system in order to prevent him from both initiating legal challenges and defending himself in actions wherein he has been a defendant.

II. Defendants

18. Defendant Heather Pinder-Rodriguez, of 425 N. Orange Avenue Orlando, FL 32801, is responsible for signing an Order declaring Moliere Dimanche a vexatious litigant, pursuant to the unConstitutional

statute §68.093, and directing attorneys to use this Order to prevent Moliere Dimanche from initiating litigation or mounting legal defenses to suits brought against him. As a judge, Rodriguez has a duty to "respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary." She abandoned this duty.

19. Rodriguez conspired with attorneys James Walson, Karen Wonsetler and Kathryn Smith to compose and deploy the weaponized Order. This resulted in Moliere Dimanche being further cast into Defendant State of Florida's caste system and advancement of the aforementioned unjust enrichment schemes. Although a judge by title, Rodriguez has waived any immunity under the doctrine of judicial immunity with her actions, including but not limited to, refusing to recuse herself from the proceedings, and issuing biased rulings for her personal friends, for which they gained financially. Rodriguez is sued in both her official and individual capacities.
20. Defendant State of Florida, of The Capitol 400 South Monroe St., Tallahassee, FL 32399-0001, has implemented the customs and policies that resulted in wanton misuse of the judiciary that resulted in Moliere Dimanche's loss of liberty and property, including actual takings of his property, ongoing attempts to do so, his false imprisonment in the

Florida Department of Corrections, and repeated unlawful convictions in the Ninth Judicial Circuit in and for Orange County, Florida.

21. Despite a complaint process through its Judicial Qualifications Commission, a customary rubber stamp on complaints allowed judges against whom complaints have been filed in this action to continue their misconduct without deterrent, which inherently emboldened their actions.
22. Despite a complaint process through its Florida Bar, a customary rubber stamp on complaints allowed lawyers against whom complaints have been filed in this action to continue their misconduct without deterrent, which inherently emboldened their actions. In one specific scenario, the Bar allowed an attorney to steal the identity of Moliere Dimanche during an investigation by Bar counsel. This identity theft went unchecked, uncorrected, and the misconduct was undeterred.
23. Defendant State of Florida waives its immunity to suit pursuant to §768.28 and 13, Art. X of the State Constitution. At all times, the Defendants were actors of “the state or any of its agencies or subdivisions” or acted in concert with those actors. Moliere Dimanche has presented a claim to the Department of Financial Services without a response having been provided.

24. These actors and agents acted in a manner that is “in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property”. The State of Florida and its agents’s “transaction[s] of its customary business” give rise to this Verified Complaint and immunity has been waived by Legislative Act. Additionally, immunity has been waived by Legislative Act for “civil rights action arising under 42 U.S.C. s. 1983 or similar federal statute” pursuant to §284.38. Defendant State of Florida is sued in its official capacity.
25. Defendant United States, through its customs and policies, stripped Moliere Dimanche of his human rights, his rights as an American citizen, and his rights as a Floridian.
26. Defendant United States, through its customs, policies and agents, falsified transcripts in legal proceedings to make a court record reflect language that was not spoken and intent that was nonexistent for the purpose of covering up a malicious and racially motivated prosecution against Moliere Dimanche initiated by Richard I. Wallsh for his friend Julia Lauren Frey.
27. Defendant United States, through its customs, policies and agents, tampered with the e-filing portal to obstruct a legal filing from Moliere Dimanche so that he could be retaliated against for advancing a legal

position. As a result, Moliere Dimanche has suffered loss of property, loss of status and has been cast further into the caste system systemically used to continue the deprivation of his rights.

28. Defendant United States, through its customs, policies and agents, weaponized the United States Marshalls Service to intimidate Moliere Dimanche as he attempted to file legal documents at the George C. Young federal courthouse, and conspired with Gonzales to shut the power off, including the lights, when Dimanche attempted to print documents. . His movements were even restricted as he came to the federal property to observe hearings wherein he was not a party to the litigation. He was even prevented from using the restroom without an accompanying Marshall.
29. Defendant United States has waived immunity to suit pursuant to 28 USC § 2674.
30. At all times, Defendants who falsified transcripts in the United States District Court for the Middle District of Orlando, Orlando Division, were “employee[s] of the United States.”
31. At all times, when the United States Marshalls Service was weaponized against Moliere Dimanche to deter his legal filings in response to his complaint about Janet Gonzales, Timothy Corrigan Janet Gonzales and the John Doe Marshalls were “employee[s] of the United States.”

32. At all times when the filing portal was tampered with by Estrella Melians to delay the legal filings of Moliere Dimanche for Daniel Irick, the involved parties were “employee[s] of the United States.” Defendant United States is sued in its official capacity.
33. Defendant Ninth Judicial Circuit in and for Orange County, as an Enterprise, is a RICO enterprise under the jurisdiction of this Court pursuant to 18 U.S. Code § 1964(a).
34. Pursuant to 18 U.S. Code § 1962(b), Defendant Ninth Judicial Circuit in and for Orange County, as an Enterprise, engaged in a pattern of racketeering activity including “kidnapping” and “extortion”, embezzlement under section 664, fraud under section 1028, mail fraud under section 1341, wire fraud under section 1343, financial institution fraud under section 1344, obstruction of justice under section 1503, witness tampering under section 1512, retaliation under section 1513, peonage under sections 1581–1592, and money laundering under section 1956.
35. Through a series of sham legal proceedings within the enterprise, Defendant Ninth Judicial Circuit in and for Orange County, as an Enterprise employed extortion, kidnapping, robbery, wire fraud and peonage to unlawfully take property, rig auctions and unjustly enrich its participants.

36. On multiple occasions, Luis Calderon, a judge within the enterprise, routinely employed these tactics for unjust enrichment. Without justification, and in concert with Andrew Edwards, he issued a capias for the arrest of Moliere Dimanche. In order to have the capias recalled by Calderon, Moliere Dimanche had to dismiss a mandamus petition filed with the Florida Supreme Court that was subsequently transferred to the 6th DCA, which challenged the powers of Andrew Edwards as an assistant state attorney.
37. This extortion from the enterprise also forced Moliere Dimanche to dismiss an appeal that was taken with the 11th Circuit Court of Appeals that challenged the remand of a removed state prosecution. This extortion served to help Julia Frey take property located at 921 S. Mills Avenue in Orlando, Florida from Moliere Dimanche, and coverup the means with which the property was illegally taken from his possession.
38. Emboldened by the success of the extortion related to the Mills property, Calderon recruited Defendants Kathryn Smith, Judah Mandel and Pondview Properties to take a property located at 2130 Opal Drive in Orlando from Moliere Dimanche, steal his identity to claim a mortgage surplus, and steal his identity a second time in a coverup attempt in the midst of an investigation by the Florida Bar. The property was successfully sold at auction as a result.

39. Within the enterprise, attorneys from the Lowndes law firm were successful at embezzling the estate of Qurentia P. Throm, who died in the presence of a Lowndes attorney, before that same attorney had her remains cremated without time for an autopsy.
40. The enterprise afforded Frey the status of “successor trustee” which paved the way for Frey to defraud Charles Schwab with a letter purporting to demonstrate her employment with Aegis Wealth Management in order to transfer the assets of Throm into a bank account she controlled. Frey knew that she was not an employee of Aegis Wealth Management but the enterprise afforded her cover for defrauding the financial institution through a series of rulings from judges Heather pinder-Rodriguez, Emerson R. Thompson, Denise Beamer, John Beamer, Mark Blechman, Tarlika Navarro, Luis Calderon and Adam McGinnis, despite Frey being a disqualified person pursuant to §732.806.
41. The enterprise and its benefits from the Throm estate is what made Moliere Dimanche a prime target of the enterprise, given his possession of the premises located at 921 S. Mills, which the enterprise and Frey had sought to embezzle from the estate. Frey later confessed, in the face of a subpoena from Moliere Dimanche in case 6:22-cv-2073-DCI-JSS (Document 156 Filed 01/29/2024, Page 5 of 10 Pages) for addition

bank records from Charles Schwab, that she had used the funds of Throm for her own taxes, credit and debit card expenditures.

42. Pursuant to § 18 U.S. Code § 1964(a), this Court has jurisdiction to “order[] dissolution or reorganization of any enterprise, making due provision for the rights of innocent persons.”
43. Combined with the enterprise’s falsification of documents to falsely imprison Moliere Dimanche, colluding with the Florida Department of Corrections to keep him falsely imprisoned, and the risk there is to other innocent people, this Court must dissolve the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise.
44. At all times, Defendant Ninth Judicial Circuit in and for Orange County, Florida as an enterprise is an agency of Defendant State of Florida.
45. Defendant Ninth Judicial Circuit in and for Orange County, Florida as an enterprise is sued in its capacity as a RICO enterprise.
46. Defendant City of Orlando, of 400 South Orange Avenue Orlando, Florida 32801, is a subdivision of Defendant State of Florida. Through a pattern of intimidation, election interference, kidnapping and theft, Defendant City of Orlando is, and has been at all times, a central part of Defendant State of Florida’s condemnation of Moliere Dimanche into the caste system.

47. Through its own agents, Rabih Tabbara, David Alban, Brent Fellows, Adam Cortes, Officer Cortes, Aaron Goss, Antonio Vargas, and its John and Jane Doe officers, while under the direct supervision of Eric Smith and Michael Massicotte (collectively the “City Defendants” of 1250 West South Street Orlando, Florida 32805) City of Orlando facilitated an unlawful arrest of Moliere Dimanche, falsified that fact, facilitated a home invasion and kidnapping, tracked and illegally surveilled Moliere Dimanche, before interfering with two elections he sought to participate as a candidate seeking to make his case to the voters of the City of Orlando.
48. Specifically, Rabih Tabbara initiated a racially motivated arrest and detention of Moliere Dimanche, based solely on the color of his skin and after being directed at “that Black man”.
49. Despite having no probable cause to do so, and without consideration of anything Moliere Dimanche said in his own defense, Tabbara arrested Moliere Dimanche.
50. Upon learning that he had no legal authority to do so, Tabbara secretly released Dimanche from detention, omitted details of Dimanche’s arrest from his Incident Report, conspired on how to frame Dimanche in order to get revenge for having to release Dimanche, and perjured himself

about these facts during a deposition concerning these events, before he was ultimately let go by the Orlando police department.

51. Alban and Fellows assisted Tabbara with this unlawful arrest and detention. However, after releasing Dimanche, all of these officers conspired to invade Dimanche's home without a warrant nor the legal authority to do so.
52. Approximately 2 weeks after these events unfolded, these same Defendants, led by Goss, Fellows, Cortes and Cortes, initiated what they called a "routine" stop at 921 S. Mills in Orlando, to "make contact" with Moliere Dimanche. Instead of attempting to actually reach Dimanche in any "routine" manner, they forced entry into the residence, searched it from top to bottom, changed the locks, and illegally transferred possession of the premises to Lauren Frey-Hamner, Julia Frey and James Walson. They did not have a warrant nor any court order to do so.
53. The home invasion was not enough for these individuals acting on behalf of Defendant City of Orlando. That same day, November 20th, 2022, OPD officer Nicolas Luciano Montes and 2 John Doe officers orchestrated a kidnapping of Dimanche, at the direction of Eric Smith.

54. Dimanche had returned to 921 S. Mills only to find that the locks had been changed. He called 911 for help to report that Julia Frey had broken into the premises and changed the locks.
55. 911 operator Jane Doe, who had been in on the home invasion and kidnapping plot, asked Dimanche why he wasn't home when officers invaded the residence. Dimanche did not solicit that information and Doe clearly knew more than what any normal citizen calling 911 for help would have expected.
56. Doe agreed to send help, but instead sent Montes, and 2 John Doe officers, who robbed Dimanche, on arrival, of his mail while holding a blinding flashlight in his face. They took his deed to the 921 S. Mills residence and never returned it. They handcuffed him, stole his car, took his money and credit cards, refused to allow him to call for help, and transported him outside of city limits and into the Orange County detention center.
57. To make the robbery, false imprisonment and kidnapping look legal, Montes created an affidavit that was processed with jail staff that falsely asserted that he had arrested Dimanche pursuant to a "signed warrant". This was false.
58. To further fabricate the affidavit and cover up the robbery, kidnapping and false imprisonment, which followed the home invasion, Montes

manufactured a fake court case number, at the direction of Eric Smith, to have Dimanche falsely imprisoned within the Orange County detention center. Defendant Orange County had a duty to validate that court case number and reject the illegal imprisonment of Dimanche. The fake court case number manufactured by Montes and Smith is “2022-00394672”.

59. After Dimanche posted bail on the fake court case, Defendant Orange County allowed Defendant Tiffany Moore Russell to alter the affidavit from Montes by scribbling in a court case number of her own in order to cover up what Montes had done.
60. These actions contributed greatly to the RICO enterprise that is the Ninth Judicial Circuit in and for Orange County, Florida, by employing a pattern of racketeering activity as outlined in 18 U.S. Code § 1961(1), including “kidnapping”, “robbery”, the “threat of murder” as these individuals were armed at all times, and trafficked Dimanche as a “person”. They successfully obtained something of value as a result, the property located at 921 S. Mills Avenue in Orlando, Florida.
61. Dimanche was the victim of Honest Services Fraud, pursuant to 18 U.S. CODE § 1346 when he called 911 for help and Jane Doe set him up as a follow-up to the home invasion and a precursor to the kidnapping, robbery and trafficking of his person. Dimanche fell victim to 18

U.S.C. § 1346 again when he was imprisoned in the Orange County detention center on a fraudulent court case and forced to post bail on fake bonds tied to the fake court case.

62. Defendants City of Orlando and Orange County are sued in their official capacities, and their capacities as participants in the RICO enterprise that is the Ninth Judicial Circuit in and for Orange County, Florida.
63. Defendants Tabbara, Alban, Massicotte, Smith, Fellows, Goss, Montes, Doe #1, Doe #2, Jane Doe, Moore-Russell, Cortes and Cortes are sued in their individual and official capacities.
64. Defendants Lowndes, Drosdick, Doster, Kantor & Reed, Julia Lauren Frey, James Walson, Michael Piccolo, Bill Dymond and Lauren Frey-Hamner, collectively the “Lowndes Defendants”, represent a prestigious law firm in Orlando, its employees, associates and affiliates.
65. The Lowndes defendants, through its facilitation of judicial nominees to the Ninth Judicial Circuit in and for Orange County, Florida, called many of the shots from within the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise.
66. Together with Defendants John Beamer, Denise Beamer, Heather Pinder-Rodriguez, Luis Calderon, Mark Blechman, Tarlika Nunez-Navarro, Emerson Thompson, and Adam McGinnis, all of whom are

judges, (collectively the Ninth Judicial Circuit Defendants) subjected Moliere Dimanche to Honest Services Fraud pursuant to 18 U.S. CODE § 1346.

67. Defendants John Beamer's and Heather Pinder-Rodriguez's "path to the bench" came by way of nomination lists to the Governor of Florida that came from the Lowndes law firm.
68. Defendant Blechman is a close friend and ally of Defendant Frey, and Defendant Thompson is a business associate of Defendant Frey.
69. Defendant Nunez-Navarro is a close friend of Defendant Blechman, and after Blechman recused himself from a case involving Frey and Dimanche, after waiting more than 6 months, Nunez-Navarro scrubbed her Instagram profile of posts highlighting their close friendship as she presided over the case as his replacement.
70. The Lowndes defendants initiated the false imprisonment imposed on Moliere Dimanche by Rabih Tabbara when Frey-Hamner called 911 and directed Tabbara's attention to "that Black man" while simultaneously informing Tabbara that she was not the owner of the property for which she had called 911.
71. The Lowndes defendants personally participated in the home invasion, with Frey-Hamner receiving the residence after the home invasion was completed, and with keys to the newly changed locks.

72. The Lowndes defendants conspired with the Ninth Judicial Circuit defendant, specifically Defendant John Beamer to facilitate the home invasion and to cover up the kidnapping, robbery and false imprisonment committed by Montes and Smith.
73. Specifically, Beamer issued a warrant for Dimanche's arrest to match the offenses composed by Montes, identically. This was done after Dimanche posted bail on the fake bonds and what prompted the handwritten coverup by Moore-Russell onto the affidavit itself.
74. Defendant Orange County Sheriff's Office intentionally returned the warrant unserved because it was aware that the warrant was not intended to be executed, but was only issued by Beamer to cover up the kidnapping, robbery and false imprisonment by Montes and Smith.
75. Beamer also went as far as to include Orlando police department as officers authorized to execute the warrant, knowing that it is illegal for municipal officers to execute arrest warrants. Under Florida law, §901.04, arrest warrants are exclusively designated for the sheriff of the county, but Beamer intended to give Montes cover for the false attestation in the affidavit that Montes had arrested Dimanche pursuant to a "signed warrant".
76. The Ninth Judicial Circuit defendants, in addition to acts committed under 18 U.S.C. § 1346, also committed acts under 18 U.S. Code § 4.

They concealed the kidnapping, home invasion, robbery and trafficking of Moliere Dimanche. However, at its root, they concealed Frey's embezzlement scheme related to the mysterious death of Qurentia P. Throm, Frey's orders to have her cremated without an autopsy despite Throm's sudden death, Frey draining Throm's bank accounts via bank fraud with Charles Schwab, and the Lowndes defendants orchestrating the crimes against Dimanche for the purpose of assisting Frey embezzle the residence as a part of her scheme to engulf Throm's entire estate.

77. Specifically, Denise Beamer, Heather Pinder-Rodriguez and Adam McGinnis possessed the bank records from Charles Schwab that Moliere Dimanche had secured via subpoena that demonstrated how Frey fraudulently portrayed herself as a financial advisor from Aegis Wealth Management in order to transfer Throm's assets into a bank account she controlled.
78. They also knew that Frey had desecrated Throm's remains without the legal authority to do so.
79. They also knew that Throm had died in Frey's presence and Frey prevented an autopsy from being performed.
80. Through the Ninth Judicial Circuit in and for Orange County, Florida, as an enterprise, both the Lowndes defendants and the Ninth Judicial Circuit defendants participated in and concealed bank fraud,

embezzlement, home invasion, robbery kidnapping, and the circumstances surrounding the death of Qurentia P. Throm.

81. The Lowndes defendants and the Ninth Judicial Circuit defendants are sued in their individual capacities, official capacities, and in their capacities as participants in the Ninth Judicial Circuit in and for Orange County, Florida, as an enterprise. The Lowndes defendants are known to operate at LOWNDES, DROSDICK, DOSTER, KANTOR & REED P.A. 215 N. Eola Drive, Orlando, FL 32801. Frey-Hamner resides at 405 Balmoral Road Winter Park, Florida 32789-5201.
82. Defendants David J. Carter and David J. Carter, Psy.D, PLLC of 1133 Louisiana Avenue Winter Park, Florida 32789, participated in the aforementioned scheme to frame, dispossess, and rob Dimanche of the premises located at 921 S. Mills Avenue in Orlando by conspiring with the City Defendants, Defendants Tabbara and Manganiello specifically, to frame Dimanche, leading to the home invasion, robbery and kidnapping. The Defendants are sued in their individual and professional capacities.
83. Defendants Takela Jackson and Richard Carpenter, in concert with the enterprise, and as agents of both Defendant City of Orlando and Defendant State of Florida, provided false information with omissions, for which they knew was false and containing omissions, to the Ninth

Judicial Circuit in and for Orange County, Florida as an enterprise to assist Defendant Beamer in covering up the robbery, kidnapping and home invasion, and with the intent to assist the City Defendants in executing the robbery, kidnapping and home invasion. Jackson and Carpenter are sued in their individual and official capacities.

84. Defendants Troy Stickle, Amy Mercado, and Lori Lucas of the Orange County Property Appraiser's Office, 200 South Orange Avenue, Suite 1700, Orlando, Florida 32801, and Defendants Phil Diamond, Debra Bradley, Rose Acosta, Terri Wilson, Jane Does 2, 3, 4, and 5, Katherine Collie and Ryan Smith of the Orange County Comptroller's Office, 109 E. Church Street, Suite 300, Orlando, Florida 32801 (collectively County Defendants), implemented customs and policies that assisted the enterprise by denying Dimanche the right to defend his property at 921 S. Mills, and 13128 Jupiter Hills Court by revoking his homestead status, forging his name on a transaction related to an alleged sale of 921 S. Mills to Julia Frey, and assisting with the kidnapping, robbery and home invasion by altering the property right before the events occurred, which Defendant Jackson cited as a justification for her application containing the false information and omissions.
85. At all times the County Defendants are agents of Defendant State of Florida. At all times these defendants were agents of Defendant Orange

County. The County Defendants are sued in their individual and official capacities.

86. Defendant David Perez is an agent of both the City of Orlando and Defendant State of Florida and worked alongside Defendant Antonio Vargas to intimidate Dimanche and dissuade him from filing complaints with the Internal Affairs Department at the OPD Headquarters. Any time Dimanche came within the vicinity of OPD Headquarters, Vargas either tracked his vehicle to issue bogus tickets, which affected Dimanche's ability to procure gainful employment, or he was falsely imprisoned by Perez. Both Defendants are Orlando police officers whose addresses are 1250 West South Street, Orlando, Florida, 32805. Both Defendants are sued in their individual and official capacities.
87. Defendants Richard Wallsh, Andrew Edwards, and Monique Worrell, of 415 N. Orange Avenue Orlando, Florida 32801, are attorneys who prosecuted a malicious criminal action on behalf of the State of Florida while contributing to the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise. Through fraud, deception, zero jurisdiction, intimidation and extortion, maintained a malicious prosecution of Dimanche in an effort to advance the enterprises goals in

taking things of value through a pattern of racketeering activity as outlined in 18 USC § 1961(1).

88. After the afore-mentioned home invasion, robbery and kidnapping, Defendant Walson maintained 2 separate lawsuits against Dimanche on behalf of Frey. One was for quiet title, presided over by Frey's business associate Emerson Thompson, who accepted at least two bribes for fixing that case, and another suit for unlawful detainer that was presided over by judge Eric Dubois, another judge nominated to the position by the Lowndes law firm. Walson dismissed the unlawful detainer action because the home invasion was successful. However, the quiet title action remained active and Dimanche continued to defend against it. After Dimanche attended a hearing on the matter before Thompson, Walson relayed Dimanche's continued opposition to the suit and Wallsh subsequently enhanced the charges against Dimanche into a criminal case that included a first degree felony.
89. After Wallsh increased the severity of the criminal case against Dimanche, Dimanche discovered that Wallsh and Frey maintained a decades-long friendship and published a photograph of the two together on a stairwell.
90. As a result of this, Mark Blechman recused himself from presiding over the case due to his personal relationship to Frey and Wallsh was

disqualified from the prosecution due to his personal relationship to Frey. It took more than 6 months for both Wallsh and Blechman to be disqualified because they both withheld their personal ties to Julia Frey.

91. Out of concern for exercising his civil rights, Dimanche removed the criminal case to federal court. Here, it was alleged that, not only was Wallsh carrying out the prosecution as a favor to Frey and the enterprise, but that he, too, had accepted a bribe from monies embezzled from the estate of Throm.
92. Defendant Carlos E. Mendoza presided over the removed action and Defendant Suzanne Trimble was the court reporter I that case. These two defendants are a part of the “United States Defendants” class.
93. Wallsh was ordered to testify about his role in the enterprise by Mendoza, and about his role in rigging the case against Roni Elias. Wallsh was accompanied by Defendant Stokes, who defended both Defendant Alicia L. Latimore’s falsification of documents that resulted in the false imprisonment of Dimanche in the Florida Department of Corrections, and Wallsh’s acceptance of a bribe to prosecute Dimanche on behalf of Frey.
94. After the hearing, Mendoza directed Trimble to falsify the transcripts related the hearing to change what had actually been said in open court

by everybody involved. For this, Mendoza was taken off of the related civil rights case and district judge Julie Sneed was assigned to the case.

95. After the disqualifications of both Blechman and Wallsh, Defendant Tarlika Nunez-Navarro and attorney Andrew Edwards were assigned as their respective replacements.
96. Edwards was not authorized as an assistant state attorney but unlawfully assumed the role anyway. Navarro withheld a conflict of interest and proceeded to preside over the case anyway. Both Defendants attempted to set Dimanche up by placing a sign on the door of Navarro's court room that would have misguided Dimanche into missing court so that a writ of habeas corpus would be issued for him with no bond afforded to him. Dimanche thwarted this scheme, but it would later be accomplished the exact same way by Defendant Luis F. Calderon, who would replace Navarro after her recusal from the case and subsequent resignation from the judiciary.
97. Just before Navarro's recusal and resignation, she rigged an arraignment. Dimanche had sought to timely pursue remedies to have the criminal case dismissed that were required to be filed prior to arraignment. Upon the filing, Navarro changed the name of the arraignment so that the documents would be untimely, and technically not considered an "arraignment", despite the case proceeding exactly

like an arraignment with other parties in different criminal cases proceeding the same way. While the sign on Navarro's door said that the June 7th arraignment was rescheduled for June 9th, she secretly scheduled it for June 8th so that Dimanche would be arrested if he showed up on June 9th.

98. Navarro scrubbed her social media posts after Dimanche revealed that she had exposed her conflicts of interest on Instagram. Dimanche then sought Navarro's recusal, and simultaneously filed a petition with the Florida Supreme Court concerning Edwards' fraudulent actions as an unauthorized assistant state attorney. At the same time, Dimanche had appealed an order issued by Mendoza remanding the criminal case back to state court with the 11th Circuit Court of Appeals.
99. After Navarro's recusal and resignation, Defendant Calderon, acting as an administrative judge, reassigned the criminal prosecution to himself. Despite all court dates that had been set by Navarro being cancelled upon her recusal, Calderon utilized the same tactic Navarro had employed to set Dimanche up to miss a court date.
100. Calderon not only taped a misleading sign to the door of the courtroom, he also switched courtrooms. Not only was the court date cancelled and Calderon proceeded as if it had not been, Calderon had been assigned

to handle post-conviction matters at the time and was not assigned to hear criminal cases.

101. In the middle of a post-conviction hearing for someone else, Calderon called the criminal case against Dimanche.
102. The state attorney who was present asked Calderon to repeat the case number as he did not have Dimanche's case in front of him and had no idea what Calderon was talking about.
103. Calderon sent an Orange County sheriff's deputy into the halls to call Dimanche, and without any input from the post-conviction state attorney, with Edwards not present at all, and without any jurisdiction over the case at all, Calderon issued a writ of habeas corpus for Dimanche with bond set at "no bond".
104. Defendants Hanny D. and Rochelle K. Were present and revoked the bonds and entered the writ of habeas corpus for Dimanche into the court files and alerted the sheriff.
105. Shortly after Calderon issued the writ of habeas corpus, Edwards called Dimanche's phone at 10:47 AM on August 10th, 2023. Edwards attempted to set Dimanche up to be arrested and worked beside Calderon to ensure that there would be no foreseeable court dates in the case. They intended to hold Dimanche in jail indefinitely in order to advance the racketeering activity of the enterprise.

106. Edwards then extorted Dimanche on behalf of the enterprise. He ordered Dimanche to dismiss his challenge to Edwards' appointment, which had been transferred to the 6th DCA by the Florida Supreme Court. Dimanche complied.

107. Edwards then ordered Dimanche to voluntarily dismiss his appeal of the remand order from Mendoza in the 11th Circuit, and Dimanche complied.

108. He then ordered Dimanche to dismiss the related civil rights case, but Dimanche explained that he could not do so until the stay in the case was lifted.

109. In exchange for the dismissals, Calderon agreed to recall the capias, but Dimanche was required to do one last thing: plea guilty to 2 misdemeanors so that Frey could use the convictions to prevail in the property dispute surrounding 921 S. Mills.

110. Dimanche complied before being finger printed, humiliated and embarrassed. As a warning, prior to Dimanche leaving the court room, Edwards told Dimanche that he would have a talk with Defendant Melissa Geist surrounding what he called "floating warrants."

111. Geist enlisted the assistance of Defendant Saleena Singh to accomplish this.

112. In an effort to prevent Dimanche from moving to lift the stay on the civil rights case imposed by Defendants Irick and Mendoza, Edwards and Geist made sure that the capias Calderon stated had been recalled remained active. This is because they knew that the deadline for Dimanche to move to lift the stay was approaching.
113. While this malicious prosecution was initiated under the supervision of Defendant Worrell, upon her suspension from office by governor Ron DeSantis, it was ultimately accomplished by her successor Defendant Andrew Bain.
114. Bain, in an effort to conceal Edwards's action as an unauthorized prosecutor, gave Edwards the legal and necessary appointment.
115. This was done just in time for the hearing wherein Calderon, Edwards, Geist, and Bain successfully extorted Dimanche into dismissing his legal filings and pleading guilty to crimes he did not commit.
116. This advanced the racketeering activity of the Ninth Judicial Circuit in and for Orange County Florida, as an enterprise.
117. Defendant Navarro, of St. Thomas University, College of Law 16401 NW 37th Ave, Miami Gardens, FL 33054-6498, Defendants Wallsh, Stokes, Edwards and Worrell of 415 N. Orange Avenue, Orlando, Florida 32801, Defendants Blechman, Bain, Calderon, Geist, Singh, Moore-Russel, Hanny D. and Rochelle K. of 425 N. Orange

Avenue, Orlando, Florida 32801, and Defendants Mendoza and Trimble, of 400 W Washington St, Orlando, FL 32801, are all sued in their individual capacities, their personal capacities, and their capacities as active participants in the Ninth Judicial Circuit in and for Orange County as an enterprise and their respective actions as agents of Defendant State of Florida and agents of Defendant United States.

118. Defendant Alicia L. Latimore of 425 N. Orange Avenue Orlando, Florida 3280, is an agent of Defendant State of Florida who rigged a criminal prosecution against Dimanche, falsified his court filings so as to obstruct justice, concealed her own crimes by sealing the commitment papers she sent to Defendant Florida Department of Corrections (501 South Calhoun Street, Tallahassee, FL 32399-2500), and edited the falsified documents to conceal the first falsification.

119. These actions cast Dimanche into the afore-mentioned caste system, the effects of which persist today.

120. At all times Defendant Florida Department of Corrections is an agency of Defendant State of Florida, and Defendant Latimore is an agent of Defendant State of Florida.

121. Defendant Latimore is sued in her official capacity, individual capacity, and capacity as a participant in the Ninth Judicial Circuit in and for Orange County as an enterprise.

122. Defendant Florida Department of Corrections is sued in its official capacity and its capacity as a participant in the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise.

123. Defendants Stephanie Herdicia, Cheryl Anderson, John Hugh Dyer, Laurie Nossair, of 400 South Orange Avenue Orlando, Florida 32801, Nick Shannin of 214 S Lucerne Cir E, Orlando, FL 32801, Bill Cowles of 119 W Kaley St, Orlando, FL 32806, David Alban of 1250 W South St, Orlando, FL 32805, and A. James Craner of 425 N. Orange Avenue Orlando, FL 32801 (collectively “Election Defendants”), are assisted the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise by repeatedly and overtly rigging elections as Dimanche sought to hold elected office in pursuit of obtaining the means and resources to put an end to corruption.

124. The actions of the election defendants sought to protect the enterprise from Dimanche holding elected office as a way to combat the prohibited activity of racketeering activity by the enterprise.

125. In 2023 Dimanche declared his candidacy in the general election for Mayor of the City of Orlando. While in a predominantly Black part of town, Dimanche registered people to vote, collected signature petitions and enjoyed the support of Black voters at the Magic Mall on July 26th, 2023.

126. Unbeknownst to Dimanche, he had been tracked by Vargas and followed by Alban while he was campaigning around the City of Orlando on July 26th, 2023.

127. Once Alban had had enough of Dimanche's success in gaining support, he drove his cruiser to where Dimanche was standing with a constituent and demanded that Dimanche "stop collecting petitions".

128. Alban falsely alleged that Defendant City of Orlando had receive a 911 call from Magic Mall owner Waz Khan about Dimanche illegally collecting petitions without permission.

129. Alban did not know that Dimanche and Khan had a previous agreement for Dimanche to utilize Magic Mall for the entire week, with a tent and speakers.

130. After being told to leave, Dimanche went into Khan's office and asked him if he had called 911, to which Khan replied "No".

131. At that exact moment, Alban was on the phone with Khan and Khan explained to Alban that Dimanche had had permission to use the Magic Mall to engage constituents for the entire week. Alban then lied to Khan and falsely alleged that Dimanche was blocking patrons from entering the front door.

132. Fearing an escalation, and knowing that Alban was known to kill Black men who disobeyed his commands, Dimanche retreated from Magic

Mall out of concern for his own safety, and out of respect for Waz Khan, who had only tried to help Dimanche win his election.

133. During the encounter, Alban acknowledged his own participation in the home invasion and false imprisonment at 921 S. Mills, which further exacerbated the encounter, and Dimanche advised Alban that he would be held accountable for his role in those crimes, if elected Mayor.

134. As Alban had foreclosed Dimanche's ability to get petitions from voters, Dimanche had become discouraged and spent the remainder of his campaign researching legal remedies at a time when he should have had enough signatures collected to secure ballot access.

135. Dimanche learned that the Florida Election Code prohibited the payment of qualifying fees in municipal elections, which guaranteed Dimanche access to the ballot in light of his inability to engage voters, which served two purposes: collect signatures and explain his vision for the future of the City.

136. Despite him finding guidance in the FEC, Defendants Nossair, Herdocia, Dyer and Cowles ensured that Dimanche had been disqualified from the race.

137. Dimanche took legal action and 9 Investigates from Channel 9 Eyewitness News interviewed him at Poppy Park, in the Carver Shores neighborhood in Orlando about the election interference.

138. Reporter Phylicia Ashley first requested comment from Herdocia, who declined comment. Ashley subsequently interviewed Cowles.

139. Cowles told Ashley that Dimanche could not run for office because he was not a property owner.

140. When Ashley sat down with Dimanche, he explained the racially motivated roots of this statement from Cowles, how this was election interference, and discussed its similarities with Voting Rights discrimination from the 1800s.

141. After Ashely reached back out to Cowles for comment on Dimanche's alleged racially motivated nature of the interference, she had learned that Cowles had resigned from the Supervisor of Elections office, ultimately replaced by Glen Gilzean.

142. While Denise Beamer ultimately dismissed the action for a failure to attach supporting affidavits, the Florida Supreme Court was made aware of the issue in a separate action and transferred the case to the Ninth Judicial Circuit in and for Orange County, Florida as an Enterprise.

143. Pursuant to §104.43, Dimanche requested that "The grand jury in any circuit shall, upon the request of any candidate or qualified voter, make a special investigation" into the 2023 general election to determine

“any violation of the provisions of this code, and shall return indictments when sufficient ground is found”.

144. Despite this lawful request, Defendant Craner, who presided over the case, conspired with Defendants Shannin and Shannin Law P.A. (214 S Lucerne Cir E, Orlando, FL 32801) to close the case before a grand jury could be allowed to convene and determine if Alban’s actions or the requirement of a qualifying fee in municipal elections constituted violations of the Florida Election Code.
145. Dimanche testified in that case, and was found to be a “credible witness”, although his request for the grand jury investigation was obstructed by Craner, Shannin and Shannin Law P.A.
146. After successfully preventing Dimanche from taking office, the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise was protected and could continue with the prohibited racketeering activity without any opposition from City Hall.
147. After the suspension of Commissioner Regina Hill from office by governor DeSantis, Dimanche filed to run for the position of Interim Commissioner.
148. Despite legally qualifying for the race, and paying the qualifying fee this time, Defendant Herdocia directed Defendant Cheryl Anderson to return the qualifying check Dimanche had pulled from his campaign

account back to Dimanche, despite the prohibition on this practice that is outlined in §99.092.

149. Dimanche did not accept the check, and Anderson tossed the check into the lobby at City Hall and left it there overnight.

150. Dimanche paid the qualifying fee, even though he knew it was a violation of the FEC for the City to accept them, solely to prevent the issues that had arose during the mayoral race.

151. After Anderson tossed the check, Herdicia disqualified Dimanche from the race for failure to pay the qualifying fee.

152. This particular election was the first for that office since the decennial redistricting, and the City's charter waived the residency requirements. Seeking clarity on this point and now having to re-address the issue with qualifying fees, Dimanche sought Opinions from both the City Attorney's Office and an Advisory Opinion (AO) from the Division of Elections.

153. On April 17th, 2024, the day after qualifying closed, attorney Ashley E. Davis with the Division of Elections provided Dimanche with an AO that confirmed municipalities cannot collect qualifying fees. This AO was provided to Glen Gilzean and Gilzean set up a phone conference with Dimanche.

154. Unfortunately, Gilzean did not address adding Dimanche's name to the ballot because Defendant Shannin was also on the conference call and advised Gilzean, as general counsel, not to give answers on the issue and did not provide any of his own.

155. The following day, Dimanche entered City Hall in an attempt to get an Opinion from the City Attorney and Shannin directed security to tell Dimanche that the City Attorney does not speak to members of the public.

156. In a final effort to address this issue, Dimanche handed paper copies of the AO to Glen Gilzean while he was talking to reporter Greg Fox at the Supervisor of Elections Office. Gilzean reviewed the AO and requested copies in digital format. Dimanche agreed, however the email address provided by Gilzean was incorrect.

157. For a second time, Dimanche was unlawfully prevented from making his case to voters and the enterprise was protected from opposition from City Hall.

158. The Election Defendants are sued in their individual capacities, official capacities, and capacities as active participants in the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise.

159. Now that the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise had extinguished Dimanche's political rise, Dimanche could only focus on raising his family.

160. While the litigation concerning 921 S. Mills was pending, Dimanche acquired a residence located at 2130 Opal Drive in Orlando.

161. While initially procured pursuant to the procedure outlined in Chapter 95 of the Florida Statutes, the residence had become an inheritance by way of the Last Will & Testament of Gregory L. Huelsberg.

162. Unfortunately, the greed and corruption within the enterprise has no ceiling, and the residence came under attack from the enterprise.

163. Defendants Reverse Mortgage Funding LLC (715 Douglas Avenue Altamonte Springs, FL 32714), Heritage Florida Jewish News (PO Box 300742 Fern Park, FL 32730), IDEA Capital Group (1110 Brickell Ave., Suite 430 Miami, FL 33131), Jeffrey L. Ashton, Christopher Grey, Luis Calderon, Kathryn Smith, Pondview Properties (1141 Arbor Glen Circle, Winter Springs, FL 32708), LLC, Rafael A. Salado (1141 Arbor Glen Circle, Winter Springs, FL 32708), Judah Mandel, Mandel Law PLLC, Larry Evans (3056 Day Ave., Miami, FL 33133), and Jen-Hsun Huang (2788 San Tomas Expressway, Santa Clara, CA 95051), and Karissa Chin-Duncan (Trade Centre South, Suite 700, 100 W Cypress Creek Rd, Fort Lauderdale, FL 33309-2181) (Foreclosure

Defendants) orchestrated a scheme to steal Dimanche's identity two times, obstruct service of process to accelerate a forced sale through a rigged auction and scam foreclosure, and take the residence from Dimanche, for the unjust enrichment of Pondview Properties, Smith, Calderon, Ashton, and the enterprise by continuing the pattern of racketeering activity conducted by the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise.

164. After the property was taken by way of the scam foreclosure and rigged sale, the Foreclosure Defendants stole Dimanche's identity in order to claim a surplus of approximately \$67,000.00.

165. Defendant Ashton, without the authority to do so, directed Defendant Chin-Duncan to file a motion for default, which Chin-Duncan complied with.

166. This came only after Ashton had abused the process for the appointment of a guardian ad litem, so as to nullify and control opposition to the foreclosure process.

167. After stealing the identity of Dimanche, the defendants also stole the identity of a deceased man named Robert Halkum to justify their theft of Dimanche's identity by way of the falsified DocuSign documents. Upon the account number from the DocuSign account being published by Dimanche to expose the fraud, Calderon and Moore-Russell

immediately concealed the number so as to obstruct the true identity of the account holder who had committed the fraud.

168. These defendants are sued in their individual capacities, official capacities and capacities as active participants in the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise.
169. After the Opal Drive residence was swept up in the racketeering activity of the enterprise, Dimanche came into possession of his current homestead residence located at 13128 Jupiter Hills Court, in Orlando Florida.

170. Defendants Wonsetler (621 Terrace Blvd., Orlando, FL 32803), Wonsetler & Webner P.A. (717 N Magnolia Ave, Orlando, FL 32803), Alvarez (150 Cavan Ln, Orlando, FL 32828), Extreme Management Team (2113 Ruby Red Blvd Ste B, Clermont, FL 34714), Eastwood Community Association (150 Cavan Ln, Orlando, FL 32828), Mercado, Lucas (200 South Orange Avenue, Suite 1700. Orlando, Florida 32801-3438), Lakeview Loan Servicing (4425 Ponce de Leon MS 5-251, Coral Gables, FL 33146), Srivastava (425 N. Orange Avenue Orlando, FL 32801), Smith (670 Coral Reef Way, Daytona Beach, Florida 32124), Walson and Pinder-Rodriguez orchestrated a scheme that entailed fraudulent liens, intimidation, threats to Dimanche's children, false statements, fraud and retaliation to take the residence by

way of the continued racketeering activity of the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise.

171. The fraud entailed misrepresentation of material facts, abuse of the appointment of a guardian ad litem process, and court filings without the knowledge or consent of clients.
172. In an extreme case of fraud and exploitation of the afore-mentioned caste system, Kathryn Smith initiated an entire legal action against Dimanche without the knowledge or consent of a client. Upon revelation that the client and Dimanche had a prior agreement, Smith coerced the client into filing a police report to cover up how she had initiated the action without that client's knowledge, and for the sole purpose of accelerating a foreclosure in a separate action, for which she had a duty to represent that same client and did not do so.
173. The scheme entailed Srivastava invading the residence, taking a picture of Dimanche's wife from behind, without her knowledge and while she was in the comfort of her own home and publishing the photo to achieve the ends of the enterprise.
174. At all times, Defendant Orange County Sheriff's Office (2500 West Colonial Drive Orlando, Florida 32804) served as an agent of the State of Florida. At all times, the Orange County Sheriff's Office enforced void orders, serve as the enforcement are of the enterprise, and seized

the properties for the enterprise as a part of the continued pattern of racketeering activity.

175. The Orange County Sheriff's Office acted as more than an enforcement arm of the enterprise. It also served as a shield with Defendants Mina and Orange County Sheriff's Office employee Hinds obstructing efforts to file complaints about the racketeering activity by Dimanche.
176. The Foreclosure Defendants, the Orange County Sheriff's Office, Mina and Hinds are sued in their individual capacities, official capacities, and in their capacities as participants in the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise.
177. In addition to the Orange County Sheriff's Office obstructing reports on the enterprise, other investigative entities and individuals protected the enterprise by concealing misconduct and preventing investigations into the actions of the enterprise.
178. Defendants Carty, Rivers, McConnell (1250 West South Street, Orlando, Florida 32805) ("Internal Affairs Defendants") served to protect the enterprise in their investigative roles by covering up false testimony related to the home invasion at 921 S. Mills as it related to the deposition of Rabih Tabbara, and the destruction of documents and the withholding of evidence.

179. Defendants Handberg (301 East Pine Street Suite 1400 Orlando, Florida 32801) and Brenton (500 W Robinson St, Orlando, FL 32801) protected the enterprise through misprision of felonies after evidence of the pattern of racketeering activity had been provided to both. Specifically, Handberg withheld multiple conflicts of interest while simultaneously directing the Marshall John Does (400 W Washington St, Orlando, FL 32801) to intimidate Dimanche whenever he entered the George C. Young courthouse.

180. Brenton had been provided physical evidence of the ongoing racketeering activity in coordination with FDLE staff in Tallahassee and refused to accept it after reviewing it.

181. At all times, the Internal Affairs Defendants, Brenton and Handberg were agents of Defendants City of Orlando, State of Florida and United States, respectively. The defendants are sued in their individual capacities, official capacities and in their capacities as active participants in the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise.

ACKNOWLEDGEMENT OF SCOPE AND COMPLEXITY

Plaintiff, Moliere Dimanche, acknowledges that as this issue has been allowed to persist, the scope and complexity have expanded, and more defendants

elect to participate in the ongoing harm. It has always been Dimanche's intent to remedy the harms he has endured, but as his efforts were obstructed, and as he was met with retaliatory effort after retaliatory effort, remedy has been virtually impossible and the ongoing harm has subsequently grown in scale and complexity.

CAPACITIES

The Defendants are being sued in their official, personal and individual capacities. The Defendants are sued in their capacities as active participants in the Ninth Judicial Circuit in and for Orange County, Florida, as an enterprise.

FACTUAL ALLEGATIONS AND EVIDENCE

Void 2008 Conviction, Fraudulent Verdict, and Wrongful Imprisonment

(2007–Ongoing)

182. The issues raised in this Verified Complaint establish a pattern of Civil Rights violations by the State of Florida to the detriment of Plaintiff.

183. This unlawful sequence of events follows the State of Florida depriving Plaintiff of his Civil Rights in a corrupt, unethical, and illegal prosecution that resulted in a void conviction and years of him being falsely imprisoned.

184. The State of Florida wrongfully imprisoned Plaintiff for 3,078 days on the basis of a fraudulent conviction for Grand Theft Second Degree in Case No. 2007-CF-18085-O, and a fraudulent probation violation.

185. Plaintiff was never convicted of Grand Theft Second Degree.

186. After a jury trial for which Plaintiff was on trial for Grand Theft Second Degree and Burglary as the result of an alleged break-in of a construction site, a jury never convicted Plaintiff of Grand Theft Second Degree and acquitted him of Burglary.

187. Defendant Latimore, not happy with the jury's verdict, fabricated the result without jurisdiction to do so.

EXHIBIT A

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IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA

CASE NUMBER: 48-07-CF- 18085-O / A

DIVISION NO: 10

STATE OF FLORIDA,
Plaintiff,
vs.
MOLIERE DIMANCHE,
Defendant.

EXHIBIT H

Court opened on 4/16/2008, with the following officers present:
Honorable Alicia Latimore, Judge Presiding. Court Reporter: Kayle Borders
Asst. State Atty.: Div 22
Court Deputy: Chad Barnett

This case came on this day for Jury Trial. The Defendant was present with counsel. Counsel's Name: David Redfearn.

Verdict
The Defendant was tried by Jury and found guilty of: 812.014(2)(c)

Judgment
Defendant was adjudicated guilty.

Jail
The defendant is ordered to serve 5 Year(s) in the Department of Corrections with credit for 134 Day(s) time served.

Restitution
The Court reserves jurisdiction as to Restitution.

Fines
The Defendant is hereby ordered to pay the following amounts: Court Costs: \$ 5.00; CCF: \$ 50.00; LGCJTF: \$ 200.00;
\$65 CRIMINAL ORDINANCE FEE.

Additional Costs
The Defendant is hereby ordered to pay a \$ 1,000.00 Public Defender Fee.

• Defendant shall comply with all conditions of the Collection Program.
• Failure to pay financial obligations will result in the suspension of your driving privileges.

04/16/2008 6:17 PM Page 1 of 2 48-07-CF- 18085-O / A
MOLIERE DIMANCHE

cc:alicia.dimanche@courts.state.fl.us

Order on "Count(s): Ct. (001) 812.014(2)(B)" demonstrating a trial for 812.014(2)(B) and adjudication for 812.014(2)(C) instead.

188. She personally announced a guilty verdict for "Grand Theft Third Degree" for which Plaintiff was not on trial, allowed the prosecutor to nolle prosequi the Burglary charge after the jury acquitted Plaintiff, then

sent fake documentation to the Department of Corrections attesting to Plaintiff's conviction of Grand Theft Second Degree. This was fraud.

Page 2 of EXHIBIT A

Case 6:23-cr-00031-CEM-DCI Document 15-15 Filed 03/30/23 Page 2 of 2 PageID 339
Case 6:23-cr-00031-CEM-DCI Document 1-6 Filed 02/27/23 Page 1 of 1 PageID 24

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA

CASE NUMBER: 48-07-CF- 18085-O / A

DIVISION NO: 10

STATE OF FLORIDA,
Plaintiff,
vs.
MOLIERE DIMANCHE,
Defendant.

JUDGMENT

The defendant, MOLIERE DIMANCHE, being personally before this court represented by David Redfearn, the attorney of record, and the state represented by Div 22, and having been tried and found guilty by jury of the following crime(s):

Count	Crime	Offense Statute Number(s)	Degree of Crime	OBTS Number
001	GRAND THEFT THRD D-22	812.014(2)(c)	FT	8888888888

and no cause being shown why the defendant should not be adjudicated guilty, IT IS ORDERED that the defendant is hereby ADJUDICATED GUILTY of the above crime(s).

Filed in Open Court this 16th day of April, 2008.

Lydia Gardner
Clerk of the Circuit and County Courts
By: K. Broadus,
Deputy Clerk in Attendance

EXHIBIT F

48-07-CF- 18085-O / A
MOLIERE DIMANCHE
04/16/2008 6:17 PM Page 1 of 2

189. She then sealed the commitment papers sent to the Florida Department of Corrections for 17 years to hide what she had done.

EXHIBIT B - Trial transcripts from Defendant Redfearn

224

1 BELIEVE THAT MR. DIMANCHE IS AN ANGEL. YOU DON'T HAVE
2 TO DISBELIEVE HE WAS UP TO NO GOOD THERE AT E & I METAL.
3 THAT'S NOT THE STANDARD, THAT'S NOT WHAT HE WAS BEING
4 CHARGED WITH. UP TO KNOW GOOD MAYBE, YOU COULD COME
5 BACK, BUT BECAUSE THERE IS ALL THIS REASONABLE DOUBT, YOU
6 HAVE TO MAKE A LEGAL DECISION, NOT A MORAL ONE. YOU CAN
7 FOLLOW THE LAW AND SAY IF YOU AGREE THE STATE HAS NOT
8 PROVEN ITS CASE, YOUR VERDICT OF NOT GUILTY IS A VERDICT
9 OF UNPROVEN, UNPROVEN.
10 WHY IS IT UNPROVEN? I TALK TO YOU FIRST IN OPENING
11 STATEMENT ABOUT THE DANGERS OF CIRCUMSTANTIAL EVIDENCE
12 CASES. WHEN THE GOVERNMENT STARTS POINTING THE FINGER,
13 IT GET LONGER AND IT IMPLICATE PEOPLE WHO MAY NOT BE
14 GUILTY. IT MAY IMPLICATE THE GUILT AND THE INNOCENCE
15 AND QUASI INNOCENCE, ALL OF THESE FACTS WITHOUT THIS ONE
16 COULD CONVICT A LOT OF PEOPLE, COULD CONVICT STEVE
17 EASTMAN. IF ROLES WERE REVERSED AND DEPUTY CROMWELL
18 SEES MR. EASTMAN AND THE SUSPECT FIRST AND ASKED MR.
19 DIMANCHE YOU WOULD HAVE THE CASE WITH STEVE EASTMAN WITH
20 THE SAME FACTS. THAT'S THE DEFINITION OF REASONABLE
21 DOUBT DOWN IN MY MIND.
22 GOING BACK HERE TO TRUST AND VERIFY. AGAIN, IF
23 THERE IS A TRANSACTION OF \$4000, IT SHOULD BE RECORDED
24 SOMEWHERE BUT APPARENTLY THERE WASN'T. *AS?*
25 SO DID THE TRANSACTION REALLY OCCUR? IF YOU

Defendant Redfearn's closing arguments implying to the jury that Plaintiff was "no angel" and was "up to no good".

190. The State of Florida and the Florida Department of Corrections was aware of this and continued to falsely imprison the Plaintiff.

191.In 2011, after being made aware of this through an inmate grievance, the Florida Department of Corrections modified its inmate search database to reflect the fraudulent conviction for Grand Theft 3rd Degree while in possession of commitment papers that said otherwise.

EXHIBIT C - Exchange between defendants to strike lesser included offenses

191

1 FROM EARLIER, YOUR HONOR, AS TO TRESPASS. I DON'T THINK
2 THERE IS SUFFICIENT EVIDENCE TO GO FORWARD ON TRESPASS.
3 THE COURT: YOUR OBJECTION IS NOTED. ANYTHING
4 FURTHER --
5 MR. REDFEARN: NO, YOUR HONOR.
6 THE COURT: AS TO THE TRESPASS INSTRUCTIONS?
7 MR. REDFEARN: BACK ON THE LESSER INCLUDED, IT
8 SHOULD BE TECHNICALLY \$20,000 OR LESS THAN \$100 NOT OR
9 MORE.
10 MR. DOMINICK: YOUR HONOR, ACTUALLY, MY POSITION
11 SHOULD BE \$20,000 OR MORE. NOT TO BACKTRACK BUT BACK ON
12 THE THEFT PAGE IT SHOULD ALSO -- I'VE MADE THAT MISTAKE.
13 IT SHOULD BE \$20,000 OR MORE IN THE UNLIKELY EVENT THAT
14 THE JURY DECIDES -- IT'S POSSIBLE THEY COULD GET
15 CONFUSED AND NOT CHECK ANYTHING, BECAUSE IT'S NOT PART
16 OF THE INSTRUCTION. I THINK IT SHOULD SAY \$20,000 OR
17 MORE, AND BACK ON THE ORIGINAL THEFT PAGE, I NEED TO
18 MAKE THAT AMENDMENT TO \$20,000 OR MORE.
19 THE COURT: LET'S MAKE IT CONSISTENT. THEN IT WILL
20 BE \$20,000 OR MORE AS CHARGED IN THE INFORMATION. WE'LL
21 HAVE A VALUE OF, VALUE OF PROPERTY SHOULD BE \$20,000 OR
22 MORE. IT SHOULD REMAIN WHEN THERE ARE LESSER INCLUDED
23 CRIMES.
24 MR. DOMINICK: WHAT WAS IT?
25 THE COURT: WHEN THERE ARE LESSER SHALL REMAIN AS

Defendants Dominic, State of Florida, Redfearn and Latimore
striking lesser included offenses

192.Latimore wanted Plaintiff convicted so badly that she announced a verdict of guilt for a lesser included offense after she, Raymond Dominic and David Redfearn conspired to strike all lesser included offenses in that case because the jury didn't believe Plaintiff committed any of the crimes for which he was on trial. These three Defendants struck those lesser included offenses in anticipation of the jury returning a verdict of guilt for Grand Theft Second Degree.

EXHIBIT D - Latimore instruction jury on lesser included offenses

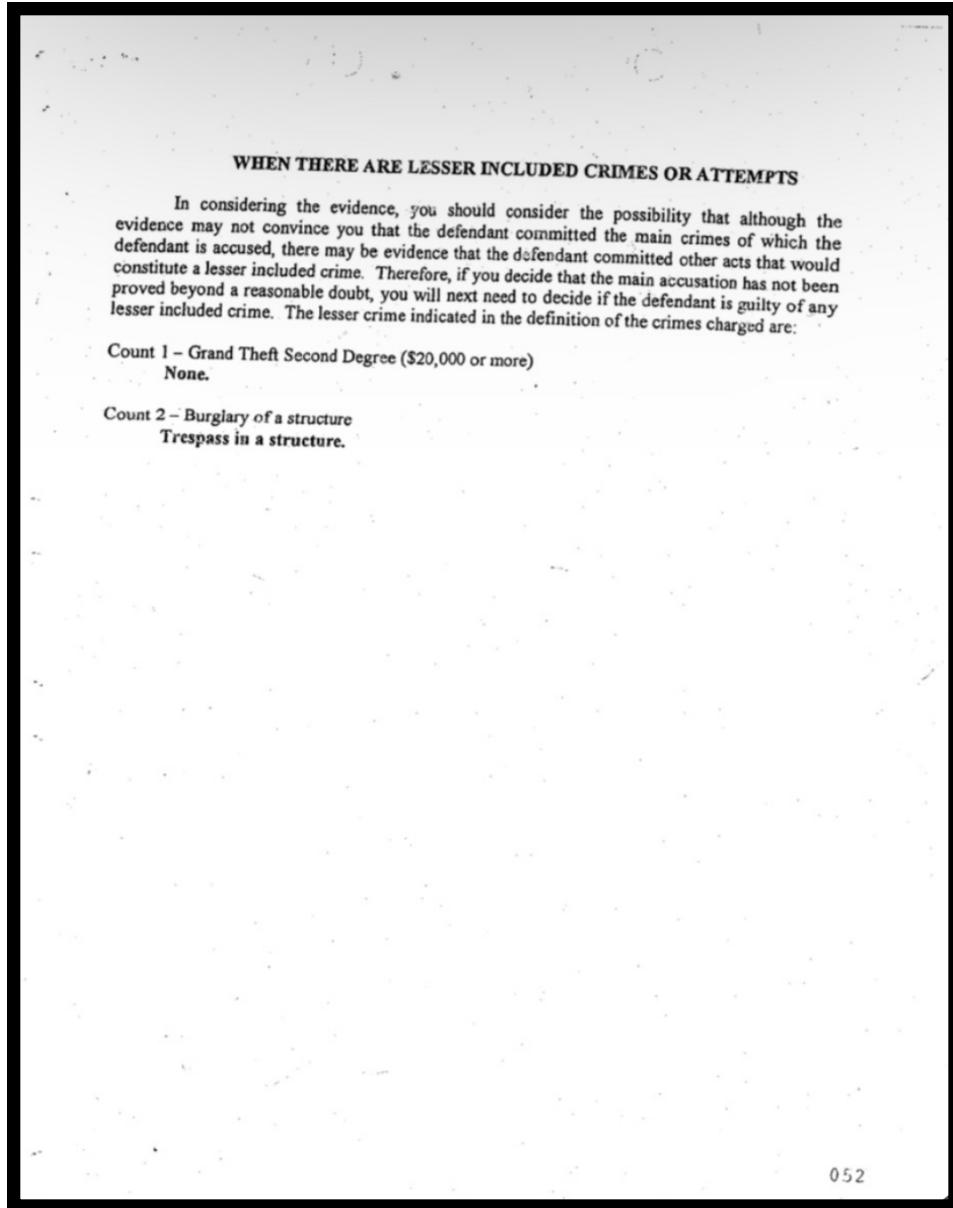
236

1 THE POSSIBILITY THAT ALTHOUGH THE EVIDENCE MAY NOT
2 CONVINCE YOU THAT THE DEFENDANT COMMITTED THE MAIN
3 CRIMES OF WHICH THE DEFENDANT IS ACCUSED, THERE MAY BE
4 EVIDENCE THAT THE DEFENDANT COMMITTED OTHER ACTS THAT
5 WOULD CONSTITUTE A LESSER INCLUDED CRIME. THEREFORE, IF
6 YOU DECIDE THAT THE MAIN ACCUSATION HAS NOT BEEN PROVED
7 BEYOND A REASONABLE DOUBT, YOU NEXT NEED TO DECIDE IF
8 THE DEFENDANT IS GUILTY OF ANY LESSER INCLUDED CRIME.
9 LESSER CRIME INDICATED IN THE DEFINITION OF THE CRIMES
10 CHARGED ARE GRAND THEFT SECOND DEGREE, \$20,000 OR MORE.
11 THEY'RE LISTED ON YOUR VERDICT FORM. THERE ARE NOT
12 ADDITIONAL ONES TO BE CONSIDERED.
13 AS TO COUNT TWO, BURGLARY OF A STRUCTURE. THE
14 LESSER INCLUDED CRIMES IS TRESPASS IN A STRUCTURE.
15 TO PROVE THE CRIME OF TRESPASS IN A STRUCTURE, THE
16 STATE MUST PROVE THE FOLLOWING THREE ELEMENTS BEYOND A
17 REASONABLE DOUBT. FIRST, MOLIERE DIMANCHE, JR.
18 WILLFULLY ENTERED A STRUCTURE. SECOND, THE STRUCTURE
19 WAS IN THE LAWFUL POSSESSION OF ECI OR ROBERT KEMP.
20 THIRD, MOLIERE DIMANCHE, JR.'S ENTERING THE PROPERTY WAS
21 WITHOUT THE PERMISSION, EXPRESSED OR IMPLIED, OF ECI OR
22 ROBERT KEMP OR ANY OTHER PERSON TO GIVE THAT PERMISSION.
23 AUTHORITY TO ENTER A STRUCTURE NEED NOT BE GIVEN IN
24 EXPRESSED WORDS. IT MAY BE IMPLIED FROM THE
25 CIRCUMSTANCES. IT IS LAWFUL TO ENTER A STRUCTURE OF

000182

Transcript of Latimore instructing jury that there are no lesser including offenses to be considered

EXHIBIT E - Jury instructions on lesser included crimes



Instructions demonstrating that lesser included crimes of Grand Theft Second Degree were listed as "None".

193. Latimore went as far as to falsify a Notice of Expiration of Speedy Trial Time filed by Plaintiff pro se after learning that he had rights available to him under Florida's Speedy Trial rules. Latimore doctored the

document to make it appear as though it said something it did not say, before she denied it without due process of law.

EXHIBIT F - First version of Notice of Expiration of Speedy Trial Time falsified by Defendants

Case 6:23-cr-00031-CEM-DCI Document 15-10 Filed 03/30/23 Page 1 of 1 PageID 331
Case 6:23-cr-00031-CEM-DCI Document 1-16 Filed 02/27/23 Page 1 of 1 PageID 34

EXHIBIT D

THE STATE OF FLORIDA	FILED IN THE OFFICE OF THE CLERK OF THE CIRCUIT COURT IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT IN AND ABOUT ORANGE COUNTY, FLORIDA
PLAINTIFF	2008 MAY 13 PM 2:56
DEFENDANT	CLERK OF THE CIRCUIT COURT ORANGE COUNTY, FLORIDA
MOLIERE DIMANCHE JR.	
DEFENDANT	
CASE NO 6:23-cr-00031-CEM-DCI	
DIVISION: 10	
NOTICE OF EXPIRATION OF SPEEDY TRIAL TIME	
COMES NOW, MOLIERE DIMANCHE JR. and files this Notice of Expiration of Speedy Trial Time pursuant to rule 3.191 of the Florida Rules of Criminal Procedure. In support of this notice Molierre Dimanche Jr. would show:	
Docketed by: C. Cambria	
1. The pleading entitled "Demand for Speedy Trial" was filed on Monday, February 25th, 2008 by attorney David L. Redfern on behalf of Molierre Dimanche Jr. 2. A hearing has been held, with notice to all parties, announcing in open court receipt of the demand. 3. In compliance with subdivision (b)(4) of rule 3.191, if a defendant has not been brought to trial within 50 days of the filing of the demand, the defendant shall have the right to the appropriate remedy as set forth in subdivision (p). 4. The 50th day from the filing of the demand is Monday, April 14th, 2008. 5. In compliance with subdivision (c) of rule 3.191, a person shall be considered to have been brought to trial IF the trial commences within the time herein provided. The trial is considered to have commenced when the trial jury panel for that specific trial is sworn for voir dire examination or, in case of a jury trial, when the trial proceedings begin before the judge.	

Pro Se Notice of Expiration of Speedy Trial Time placed on scanner with bottom 2 premises covered up.

194. In 2020, upon being made aware that Plaintiff intended to sue her for this crime, and the public defender and assistant state attorney who participated in it, David L. Redfearn and Raymond Dominic, she falsified the same document again to cover up the fact that she falsified it the first time. This time, she used image editing software.

EXHIBIT G - Certified copies of handwritten Notice of Expiration of Speedy Trial Time (Red)

THE STATE OF FLORIDA	IN THE CIRCUIT COURT OF THE
PLAINTIFF	NINTH JUDICIAL CIRCUIT, IN AND
	FOR ORANGE COUNTY, FLORIDA
MOLIERE DIMANCHE JR.	CASE NO: 48-2007-CF-1885
DEFENDANT	DIVISION: 10

NOTICE OF EXPIRATION OF SPEEDY TRIAL TIME

COMES NOW, MOLIERE DIMANCHE JR. and files this Notice of Expiration of Speedy Trial Time pursuant to rule 3.19 of the Florida Rules of Criminal Procedure. In support of this notice, Moliere Dimanche Jr. would show:

1. The pleading entitled "Demand for Speedy Trial" was filed ^{on} Monday, ^{25th} February ²⁰⁰⁸ by attorney David L. Redfearn on behalf ^{of} Moliere Dimanche Jr.

2. A hearing has been held, with notice to all parties, announcing ⁱⁿ open court receipt of the demand.

3. In compliance with subdivision (b)(4) of rule 3.19, if a defendant has not been brought to trial within 50 days of the filing of the demand, the defendant shall have the right to the appropriate remedy as set forth in subdivision (p).

4. The 50th day from the filing of the demand is Monday, April 14th, 2008.

5. In compliance with subdivision (c) of rule 3.19, a person shall be considered to have been brought to trial IF the trial commences within the time herein provided. The trial is considered to have commenced when the jury panel for that specific trial is sworn for voir dire examination or, in waiver of a jury trial, when the trial proceedings begin before the judge.

6. A trial jury panel for this specific trial was not sworn for voir dire before Monday, April 14th, 2008 nor within 50 days of the filing of the demand.

7. In compliance with subdivision (c) of rule 3.19, Moliere Dimanche Jr. has not yet been brought to trial.

8. A time extension under subdivision (i) of rule 3.19 has not been ordered by the Court.

9. In compliance with subdivision (p)(2) of rule 3.19, at any time after the expiration of the prescribed time period, the defendant may file a separate pleading entitled "Notice of Expiration of Speedy Trial Time," and serve a copy on the prosecuting authority.

10. In compliance with subdivision (p)(3) of rule 3.19, no later than 5 days from the date of the filing of a notice of expiration of speedy trial time, the Court shall hold a hearing on the notice and, unless the Court finds that one of the reasons set forth in subdivision (j) exists, shall order that the defendant be brought to trial within 10 days. A defendant not brought to trial within the 10-day period, through no fault of the defendant, on motion of the defendant or the Court, shall be forever discharged from the crime.

According to the above mentioned facts and the mandatory procedure established by rule 3.19 of the Florida Rules of Criminal Procedure, Moliere Dimanche Jr. respectfully files this notice.

Respectfully,

Moliere Dimanche Jr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy has been furnished to State Attorney's Office, 415 North Orange Avenue, Orlando, Florida 32802 by U.S. Mail this day May 12th, 2008.

Moliere Dimanche Jr.
Moliere Dimanche Jr. 07056556
3723 Vision Blvd. P.O. Box 4970
Orlando, Florida 32802

State of Florida, County of Orange
I hereby certify that the foregoing is a true and correct copy of the instrument filed in this office.
Confidential or sealed items, if any, have been removed and are being held by the Clerk of the Court.
Without my hand and official seal this day of
Tiffany Moore Russell, Clerk of the Circuit Court
By: *Tiffany Moore Russell*



**EXHIBIT H - Second Handwritten Notice of Expiration of
Speedy Trial Time (Blue)**

THE STATE OF FLORIDA		FILING OFFICE CRIMINAL	IN THE CIRCUIT COURT OF THE
PLAINTIFF		2008 MAY 13 PM 2:56	NINTH JUDICIAL CIRCUIT IN AND
		CLERK CIRCUIT COURT ORANGE CO. FL.	FOR ORANGE COUNTY, FLORIDA
MOLIERE DIMANCHE JR.		CASE NO 98-2027-OF-18085-0	
DEFENDANT		DIVISION 10	
NOTICE OF EXPIRATION OF SPEEDY TRIAL TIME			
<p>COMES NOW, MOLIERE DIMANCHE JR. and files this Notice of Expiration of Speedy Trial Time pursuant to rule 3.191 of the Florida Rules of Criminal Procedure. In support of this notice Moliere Dimanche Jr. would show:</p> <p style="text-align: right;">Docketed by: C. Cameron</p>			
<p>1. The pleading entitled "Demand for Speedy Trial" was filed on Monday, February 25th, 2008 by attorney David L. Redfern on behalf of Moliere Dimanche Jr.</p> <p>2. A hearing has been held, with notice to all parties, announcing in open court receipt of the demand.</p> <p>3. In compliance with subdivision (b)(4) of rule 3.191, if a defendant has not been brought to trial within 50 days of the filing of the demand, the defendant shall have the right to the appropriate remedy as set forth in subdivision (p).</p> <p>4. The 50th day from the filing of the demand is Monday, April 14th, 2008.</p> <p>5. In compliance with subdivision (c) of rule 3.191, a person shall be considered to have been brought to trial IF the trial commences within the time herein provided. The trial is considered to have commenced when the trial jury panel for that specific trial is sworn for voir dire examination or, on waiver of a jury trial, when the trial proceedings begin before the judge.</p> <p>6. A trial jury panel for this specific trial was not sworn for voir dire before Monday, April 14th, 2008 nor within 50 days of the filing of the demand.</p> <p>7. In compliance with subdivision (c) of rule 3.191, Moliere Dimanche Jr. has not yet been brought to trial.</p>			

8. A time extension under subdivision (i) of rule 3.191 has not been Ordered by the Court.
9. In compliance with subdivision (p)(2) of rule 3.191, at any time after the expiration of the prescribed time period, the defendant may file a separate pleading entitled "Notice of Expiration of Speedy Trial Time," and serve a copy on the prosecuting authority.
10. In compliance with subdivision (p)(3) of rule 3.191, no later than 5 days from the date of the filing of a notice of expiration of speedy trial time, the Court shall hold a hearing on the notice and, unless the Court finds that one of the reasons set forth in subdivision (j) exists, shall Order that the defendant be brought to trial within 10 days. A defendant not brought to trial within the 10-day period through no fault of the defendant, on motion of the defendant or the Court, shall be forever discharged from the crime.

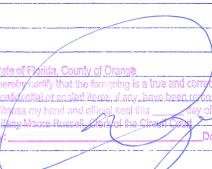
According to the above mentioned facts and the mandatory procedure established by rule 3.191 of the Florida Rules of Criminal Procedure, Moliere Dimanche Jr. respectfully files this notice.

Respectfully,


MOLIERE DIMANCHE JR.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy has been furnished to State Attorney Office, 415 North Orange Avenue, P.O. Box 1673, Orlando, Florida 32802 by U.S. Mail this day May 12th, 2008.


Moliere Dimanche Jr. 0507556
3723 Vista Blvd. P.O. Box 4970
Orlando, Florida 32802

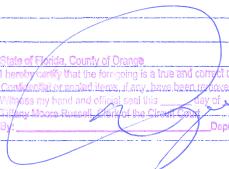

State of Florida, County of Orange
I hereby certify that the foregoing is a true and correct copy of the instrument filed in this office.
Court Clerk or record keeper, if any, have been informed of the filing of this instrument.
Witness my hand and office seal this FEB 24 2008 day of
January Above, 2008, at the County Clerk's office.
Deputy Clerk

EXHIBIT I - Combined Overlap of both Notices

<p>THE STATE OF FLORIDA vs. PLAINTIFF vs. DEFENDANT</p>		<p>IN THE THE CIRCUIT COURT OF THE NINETH JUDICIAL CIRCUIT AND FOR ORANGE COUNTY FLORIDA</p>
<p>MOIREE DIMANCHE JR.</p>		<p>CASE NO: 08-2007-CF-18085-9 DIVISION: 10</p>
<p>NOTICE OF EXPIRATION OF SPEEDY TRIAL TIME</p>		
<p>COMES NOW, MOIREE DIMANCHE JR. and FILED this Notice of Expiration of Speedy Trial Time pursuant to rule 3.191 Florida Rules of Criminal Procedure, to support a finding that the Moiere Dimanche Jr. should show:</p>		
<p>Docketed by: C. Camara</p>		
<p>1. The pleading entitled "Demand for Speedy Trial" was filed on Monday, February 25th, 2008 by attorney David L. Redfearn on behalf of Moiree Dimanche Jr.</p>		
<p>2. A hearing has been held, with notice to all parties, announcing in open court receipt of the demand.</p>		
<p>3. In compliance with subdivision (b)(4) of rule 3.191, if a defendant has not been brought to trial within 50 days of the filing of the demand, the defendant shall have the right to the appropriate remedy as set forth in subdivision (p).</p>		
<p>4. The 50th day from the filing of the demand is Monday, April 14th, 2008.</p>		
<p>5. In compliance with subdivision (c) of rule 3.191, a person shall be considered to have been brought to trial IF the trial commences within the time herein provided. The trial is considered to have commenced when the trial jury panel for that specific trial is sworn for voir dire examination or, on waiver of a jury trial, when the trial proceedings begin before the judge.</p>		
<p>6. A trial jury panel for this specific trial was not sworn for voir dire before Monday, April 14th, 2008 nor within 50 days of the filing of the demand.</p>		
<p>7. In compliance with subdivision (c) of rule 3.191, Moiree Dimanche Jr. has not yet been brought to trial.</p>		

Overlap demonstrating that body of both handwritten Notices are exactly the same, proof of editing with software that used one body of text for both Notices in order to coverup first falsification on the scanner.

8. A time extension under subdivision (i) of rule 3.191 has not been Ordered by the Court.

9. In compliance with subdivision (p)(2) of rule 3.191, at any time after the expiration of the prescribed time period, the defendant may file a separate pleading entitled "Notice of Expiration of Speedy Trial Time", and serve a copy on the prosecuting authority.

10. In compliance with subdivision (p)(3) of rule 3.191, no later than 5 days from the date of the filing of a notice of expiration of speedy trial time, the Court shall hold a hearing on the notice and, unless the Court finds that one of the reasons set forth in subdivision (j) exists, shall Order that the defendant be brought to trial within 10 days. A defendant not brought to trial within the 10-day period, through no fault of the defendant, on motion of the defendant or the Court, shall be forever discharged from the crime.

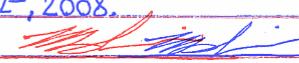
According to the above mentioned facts and the mandatory procedure established by rule 3.191 of the Florida Rules of Criminal Procedure, I, Moliere Dimanche Jr., respectfully file this notice.

Respectfully,


Moliere Dimanche Jr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy has been furnished to State Attorney Office, 415 North Orange Avenue, P.O. Box 167830 Orlando, Florida 32802 by May 12th 2008 this day of May 12th 2008.


Moliere Dimanche Jr. 307056556

3723 Vision Blvd, Suite 4970
Orlando, Florida 32802

State of Florida, County of Orange

I hereby certify that the foregoing is a true and correct copy of the instrument filed in this office.

Confidential or sealed documents have been removed per Rule 2.4-1A(a)(2).

WITNESS my hand and seal this a true and correct copy of the instrument filed in this office.

I hereby certify that the foregoing is a true and correct copy of the instrument filed in this office.

By: Confidential or sealed documents have been removed per Rule 2.4-1A(a)(2).

Tiffany Moore Russell, Clerk of the Court

Deputy Clerk

Deputy Clerk



Black text from combined red and blue text perfectly aligns handwritten body of Notice, which is impossible for 2 separately handwritten documents.

195. After the void conviction, Plaintiff was given even more time in prison, and a year of probation, for violating probation on the fraudulent basis that he had been convicted of:

- Grand Theft Second Degree (2007-CF-18085-O);
- Burglary of a Structure (2007-CF-18085-O);
- Impairing a Phone Line to Facilitate a Burglary (2007-CF-18085-O);
- Dealing in Stolen Property (2007-CF-003720-B).

196. Plaintiff was never convicted of any of those crimes, and the sole basis of the probation violation, according to Defendant Roger McDonald and Defendant George Mangrum, who was acting on behalf of Defendant State of Florida, was the void judgment and sentence imposed on Plaintiff by Latimore, and a Dealing in Stolen Property case from Lake County, which Plaintiff successfully defeated pro se.

197. Mangrum provided the Judgment & Sentence to McDonald as evidence, and when Plaintiff advised McDonald that he was not on trial for that offense, McDonald accused Plaintiff of “Look[ing] that gift horse in the mouth” before imposing a consecutive 5-year sentence on the Plaintiff without due process of law.

198. There was absolutely no legal basis for the State of Florida to wrongfully imprison Plaintiff for 3,078 days.

199. Plaintiff is not a criminal and has missed the best years of his life, his youth, because of the pattern of Civil Rights violations that the State of Florida has imposed on him.

200. Although Plaintiff has been to prison and has survived assaults on his rights by the Defendants doesn't mean he is immune to pain and suffering, harm. He has suffered from them all.

201. This "root" harm enabled downstream abuses; it is void ab initio for lack of jurisdiction, judicial fraud, and due process violations.

Overarching Conspiracy

202. This specific episode reflects a § 1985(3) conspiracy among Defendants Latimore, McDonald, Mangrum, Redfearn, Dominic, State of Florida, and Florida Department of Corrections, motivated by retaliation for Plaintiff's pro se challenges, depriving equal protection (14th Amend.) and due process. State of Florida's customs and policies enable this by lacking safeguards, oversight nor due consideration for pro se litigants as a class, nor poor/indigent People as a class. The Ninth Judicial Circuit has been converted into a criminal enterprise, functioning as the headquarters for racketeering activities where judges, prosecutors, and

public defenders collude to fabricate convictions, falsify documents, and obstruct justice for personal or systemic gain, mirroring patterns seen in suits against corrupt courts, like the Kids for Cash scandal in Wilkes-Barre, Pennsylvania wherein judges Michael Conahan and Mark Ciavarella were convicted.

The Prestigious Law Firm Endangering the Public (2022–Ongoing)

203. This episode reveals how Defendants Lowndes, Dymond, Frey, and their co-conspirators, including judges, lawyers, government officials and law enforcement officers, leveraging prestige, racial bias, and public office, operated a racketeering enterprise to embezzle estates, seize property, and prey on opposition through unlawful arrests, home invasions, kidnappings, extortion, and judicial sabotage. These acts, enabled by Florida's lax oversight of elite networks and their access to lawmakers, customs and policies affecting the poor, Black people and pro se litigants especially, violated Plaintiff's 1st, 4th, 5th, 6th, 7th, 8th, and 14th Amendment rights, as well as Florida Constitution Art. I §§ 2, 9, 12, 16, 22, and Art. X § 4. The pattern constitutes continuing violations of the Plaintiff's rights.

204. Defendant Lowndes is an Orlando-based law firm which boasts that 11 of its attorneys have been named as *Florida Super Lawyers*, and

another 38 having been recognized as the “Best Lawyers in America” in 2023. Its president, Dymond, has been named to the “People to Know” in Orlando list by *Florida Trend*.

205. In 2022, Frey, an attorney at Lowndes, was recognized in the *Best Lawyer: Family Law* edition, having been recognized for her expertise in estate planning, probate, trust administration and elder law.
206. On June 13, 2019, Frey, in an interview with *Super Lawyers*, stated:

Really, estate practice is a people practice. I can't tell you how many clients I've had who say, “Ah! I finally understand what it is I'm signing. I've done this before, but no one's ever explained it; they talk gobbledegook, and I'm embarrassed to ask a question.”

207. Frey went on to state:

When an individual passes away, there are not only physical possessions to distribute, but many have significant and substantial digital assets as well, social media accounts, email messages, digitally stored documents, digital

photographs, videos, digital music, domain names, online access to financial and other accounts, and cryptocurrency.

The article concludes that:

Failure to specify who can access which accounts can end in these digital assets being misused or lost, and can even result in fraud.

208. The truth, however, is that Lowndes, with the estate-planning expertise of Frey, and the social status of Dymond, oversaw, managed and operated a criminal enterprise wherein Frey and Dymond preyed upon the fact that people did not understand the “gobbledygook” involved in estate-planning and intentionally misused the email messages, digitally stored documents, online access to financial accounts and the physical possessions of their clients for their own unjust enrichment.
209. Frey and Dymond employed the practice of writing themselves into the estate-planning instruments of elderly members of the community by employing “gobbledygook” to disguise their beneficial interests hidden within the documents they prepared.

210. Continuing this criminal enterprise successfully demanded a certain level of secrecy so as to remain undetectable to the public. As such, the mandatory public disclosures and notices under the law pertaining to trust administration and estate distribution were not detectable by members of the public, as required under the law.

211. Dymond and Frey secretly utilized the email address of a deceased man, Cicero B. Greenhouse, to fraudulently open a bank account with Charles Schwab in the name of his terminally ill wife, Qurentia P. Throm.

212. Throm died suddenly after being invited to lunch by Frey and was with Frey when she had a heart attack. Despite Florida law requiring an autopsy for sudden deaths under Fla. Stat. § 406.11(1)(b) & (3), mandating medical examiner investigation and autopsy for "sudden deaths of persons in apparent good health" to determine cause/manner and preserve evidence, Frey ordered the immediate cremation of Throm's body at DeGusipe Funeral Home, obstructing the performance of an autopsy in violation of § 406.11(2)'s ME "charge of the dead body" during inquiry, § 406.09's preservation duty post-notification, and § 406.13's prohibition on willful destruction of remains.

213. Since Frey immediately had Throm's body cremated, a cause of death could not be accurately determined. Under Florida law, the decision to cremate the remains of a loved one is vested in family members per § 497.005(43)'s priority order:

- spouse > adult child > parent > sibling > relative > guardian
> PR if none higher

subject to § 497.607(1)(a)'s 48-hour wait for the medical examiner's review and § 497.607(1)(b)'s written authorization from a "legally authorized person". Frey, with her prestige and connections, was able to circumvent this requirement and had Throm cremated without an autopsy having been performed, exceeding her alleged unappointed-personal-representative role under. This is in addition to Frey, Lowndes, Dymond and Frey-Carter being disqualified beneficiaries of any estate assets of Throm pursuant to § 732.806.

214. According to Gene Brimmer with the Florida Department of Funerals, Cemetery and Consumer Services (DFS regulator), Frey provided documentation to DeGusipe Funeral Home purporting to be the personal representative of Throm's estate and had the legal authority to have her remains cremated. This misrepresentation enabled the obstruction.

215. After the mysterious death of Qurentia Throm, which was never investigated to determine if the cause of death was natural or a homicide, the Defendants committed fraud by portraying Frey as a financial consultant in an application to open the account, fraudulently using a letterhead for a wealth management company neither of them worked for, *Aegis Wealth Management*, shortly after Mrs. Throm's mysterious death.
216. During this time the Plaintiff made a good-faith adverse possession claim to an abandoned residence located at 921 S. Mills Avenue, Orlando, Florida 32805, pursuant to Florida's laws rewarding those who make productive use of abandoned and derelict properties. The Plaintiff's good-faith adverse possession claim collided with the fraudulent scheme executed by Lowndes, Dymond, and Frey.
217. As The Plaintiff's claim interfered with the embezzlement efforts of Lowndes, Dymond and Frey, Dimanche was punished in an act of reprisal that involved a sophisticated network of government officials, law enforcement personnel, a relative, and attorneys willing to do anything they could to systematically deprive Dimanche of his Civil Rights. Among having his Civil Rights stripped without any regard for the law, Lowndes, Dymond and Frey subjected Dimanche to:
 - An armed home invasion;

EXHIBIT J - Letter sent to Charles Schwab by Defendant Frey



Wednesday, May 11, 2022

RE: INTERNAL JOURNAL REQUEST

Please accept this letter of instruction as evidence of my intent to transfer all securities and cash from the C. GREATHOUSE & Q. THROM REVOCABLE TRUST account, #6154-2769, to the soon-to-be-established Irrevocable Trust account; see attached Schwab One Trust Account application.

After the transfer is complete, please close the Revocable Living Trust [REDACTED]

Signed,

A handwritten signature in black ink, appearing to read "Julia L. Frey".

JULIA L. FREY, TRUSTEE

Accepted,

A handwritten signature in black ink, appearing to read "Julia L. Frey".

JULIA L. FREY, TRUSTEE

698 N. Maitland Avenue, Suite 102, Maitland, FL 32751 • Phone: (407) 831-3660
www.AegisWM.com

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Frey, while not a registered agent with the Florida Office of Financial Regulation, sent a letter to Charles Schwab with a letterhead from Aegis Wealth Management, LLC, for which Frey is not an employee, with instructions to transfer the assets of the deceased Qurentia Throm into a bank account she controlled.

- An actual kidnapping on the night of November 20th, 2022;
- Obstruction of his access to law enforcement;
- Theft of his vehicle;
- A racist and selective prosecution;
- Two more kidnapping attempts;
- Theft of his home;
- Defamation of his good name in public by falsely asserting that he was convicted of a burglary for which he was actually **acquitted** in case 2007-CF-18085-O;
- A successful extortion effort wherein Dimanche had to dismiss appellate litigation he initiated in good faith in the Sixth District Court of Appeals, and the Eleventh Circuit Court of Appeal in exchange for his well-being and his freedom, thus stripping him of his entitlement to access to the courts;
- Armed intimidation of his mayoral campaign that interfered with the 2023 election for Mayor of the City of Orlando and violated Dimanche's Voting Rights.

218. Lowndes, Dymond and Frey used their powerful and vicious influence as attorneys from a prestigious law firm with deep ties to judges (some of whom attorney Tara Tedrow of the Lowndes law firm

nominated to the bench), to terrorize the Plaintiff and deprive him of his Civil Rights without a care in the world for due process of law. They only cared about their unjust enrichment, no matter what rights the Plaintiff was entitled to that were violated in the process.

219. Initially, Frey had called Orlando police to the residence after her sister, Lauren Frey-Hamner, had forced entry into the residence and was fled after being discovered by the Plaintiff.
220. Upon their arrival, Defendants Tabbara, Alban, Fellows and Manganiello detained the Plaintiff without any justification. Tabbara

EXHIBIT K



Tabbara searching and arresting Plaintiff, which he claimed not to have done

was the first to arrive and immediately encountered Frey-Hamner, who directed his attention to “that Black man right there”. Despite Plaintiff being the only other person on the scene with Frey-Hamner and Tabbara, his race

EXHIBIT L



Frey-Hamner directing Tabbara's attention to "that Black man"

EXHIBIT M



Frey-Hamner conspiring with OPD to have Plaintiff arrested

was highlighted solely with the intent to frustrate known tensions between Black men and police officers.

EXHIBIT N



Frey and Carter conspiring with OPD to have Plaintiff arrested

221. Tabbara handcuffed and detained the Plaintiff, although he would later omit this fact from his Incident Report. The allegations made by Frey and Frey-Hamner on that day, November 10, 2022, were investigated by Orlando police and the Plaintiff was released from handcuffs and detention and Frey and Frey-Hamner were asked to leave the premises.

Home Invasion

222. On July 26, 2022 while campaigning for re-election, Defendant Beamer told the Orlando Sentinel, concerning *emotional intelligence* on the bench:

The hard decision sometimes, in these cases, and knowing that you're doing it according to the law, based on your experience in each case that comes before you, on its own merits, but quite frankly just being able to kind of override that and look past it and really do the job that the people expect us to do.

223. In the same interview, Beamer made his case to the voters that he knew how to uphold the law, and what judges are expected to do by stating:

Then, and *only* then, after we've heard all of the facts, and arguments under the law, make a decision *applying* that law fairly and equally to people. I don't think membership in an organization defines an individual. It certainly doesn't define me.

224. The truth, however, is that Beamer betrayed his commitment to his constituents when he went against everything he pledged to them with these statements. Knowing that “Then, and *only* then, after we’ve heard all of the facts” a judge shall apply “that law fairly and equally to people.” And while Beamer admitted that the duty of maintaining public trust is a “hard decision sometimes” when one has to do so “according to the law, based on your experience in each case that comes before you,” he also knew that whether the decision was hard or easy, he was obligated to apply “that law fairly and equally to people.”

225. Beamer signed an illegal warrant for the arrest of Dimanche. The warrant was purportedly submitted by Jackson, who incorporated, verbatim, language from an informational report composed by Tabbara. When Beamer received the warrant application from Jackson, it was missing pages. Beamer still signed the warrant knowing that he hadn’t “heard all of the facts.”

226. The warrant was electronically signed and not sworn to before a before a person authorized to take oaths in the State of Florida. Beamer still signed the warrant knowing he wasn’t “doing it according to the law.”

227. The warrant application did not alleged a single offense contained in the statutes for which Beamer issued the arrest warrant. Beamer still signed the warrant knowing he wasn't "do[ing] the job that the people expect[ed] [him] to do."

228. The warrant was issued authorizing the Orlando Police Department and the Chief of Police to seize the Plaintiff's person and remove him from liberty, and Florida law prohibits the execution of arrest warrants by any entity that is not that of the Sheriff. This was a state-sanctioned kidnapping order, a void one, that actually resulted in the kidnapping of Dimanche by Orlando police officers Montes, Doe #1, Doe #2, Jane, and Frey. Beamer made a "decision *applying* that law [un]fairly and [un]equally to" Dimanche.

229. Beamer knew at the time he issued the arrest warrant authorizing the Orlando Police Department to kidnap Dimanche that he had a personal and business relationship with Lowndes. He co-paneled at least one discussion with a Lowndes shareholder on February 21st, 2020, a Lowndes shareholder nominated him to the bench on August 9th, 2019, and again on December 20th, 2019. Despite his assertion that "I don't think membership in an organization defines an individual", he allowed the fact that Dimanche is not a member of the prestigious law community of Orlando to define Dimanche, and

Beamer treated Dimanche differently, and without applying the “law fairly and equally.”

230. This failure to overcome the “emotional intelligence” hurdles Beamer elaborated on to the Orlando Sentinel caused Beamer to act without jurisdiction and violate the Plaintiff’s Civil Rights. After issuing the illegal warrant, Beamer told Lowndes, Frey, Dymond, Hamner, Jackson, Tabbara, Cortes, Jane, Montes, Doe #1, Doe #2, Walson, Cortes 2, Goss, Fellows, and many others to anticipate his signing of the warrant so that they can be prepared to execute a home invasion, prevent Dimanche from reporting the home invasion, steal the residence located at 921 South Mills Avenue from Dimanche while he was in peaceful possession of the residence, steal his car, kidnap him, and further the efforts employed by Lowndes, Frey and Dymond to embezzle the assets of Qurentia P. Throm.
231. As a show of gratitude for Lowndes nominating Beamer to the bench, Beamer willfully deprived Dimanche of his Civil Rights, and without due process of law.

A “Black Man”, a Grudge, and a Plan

232. Prior to Beamer paying his debt to Lowndes, Hamner forced entry into the Plaintiff’s residence on November 10th, 2022. Upon being

caught in the act of a burglary, Hamner ran out of the home while screaming into her phone “Julie, I’m out of the deal!” Hamner was informing her sister, Frey, that she no longer wished to participate in the embezzlement efforts of Lowndes, Dymond and Frey, after having been caught in the act by Dimanche.

233. Hamner left the residence and returned with Orlando police officer Rabih Tabbara. Despite the Plaintiff being the only person in sight, Hamner directed Tabbara’s attention to Dimanche’s race by stating:

That’s him! That *Black* man, right there!

234. Hamner sought to capitalize off of the well-documented patterns of police violence in relation to encounters with Black people.
235. Hamner’s efforts were a success and Tabbara ordered Dimanche to exit the home, in violation of the Plaintiff’s right to be secure in his person, house, paper and effects, and his right against unreasonable searches and seizures.
236. Tabbara did not have a warrant for Dimanche. Tabbara did not know Hamner’s name at the time. Tabbara did not have any sworn testimony from Hamner. Tabbara could not verify Hamner’s connection to the property. Tabbara had no evidence that a crime had been committed

and still ordered the Plaintiff to exit the “house”, searched the Plaintiff’s “person”, removed items from the Plaintiff’s pocket, detained the Plaintiff without reading the Plaintiff a Miranda warning, and placed the Plaintiff in handcuffs. This was solely because Dimanche is Black and his accuser was White.

237. Without explaining why the Plaintiff was placed in handcuffs, Tabbara, after making the Plaintiff sit on the ground in the rain, instructed the Plaintiff to get to his feet before Alban and Doe #3 took possession of Dimanche, in furtherance of Tabbara’s unlawful arrest, detention, search and seizure of Dimanche. Tabbara left Dimanche in the custody of Alban and Doe #3.
238. Alban and Doe #3 ridiculed Dimanche before offering Dimanche \$800,000.00 as a result of his adverse possession claim, to which Dimanche declined. Alban took amusement with the Plaintiff’s shoes, which were Christian Louboutin sneakers that were designed with spike-like shards, and indicated that the shards on the shoes would be better served if Orlando police had the same shoes to kick suspects. Doe #3 agreed with him. This vicious expression for a need for the bloody assault of people in police custody lead Dimanche to believe that Alban and Doe #3 were planning on assaulting him while he was

in handcuffs. Dimanche did his best to lighten the mood and maintain a friendly demeanor.

239. While Alban and Doe #3 detained Dimanche, Tabbara returned to his squad vehicle and falsely called in a burglary in progress over his radio. Specifically, Tabbara used his radio to call in a burglary by code by falsely alleging:

21 in progress.

240. After he falsely called in the burglary, Tabbara was approached by Fellows, who inquired the facts for which Tabbara had initiated the arrest of Dimanche. When asked by Fellows what Hamner's name was, Tabbara replied:

I don't know.

241. Tabbara had no probable cause to arrest Dimanche, no probable cause to report a burglary, and had no information on who his alleged victim was, not even her name. While talking to a civilian on the sidewalk who inquired into the police presence at the residence, Tabbara

defamed the Plaintiff by informing the unidentified civilian that Dimanche had committed a burglary. Specifically, the civilian asked:

Did someone break in?

to which Tabbara replied :

Kind of, yes.

242. When the facts eventually came to light, Tabbara's supervisor, Massicotte, informed Tabbara by text message and verbally that he had unlawfully arrested Dimanche. Massicotte then escorted Tabbara back to where Alban and Doe #3 were still detaining Dimanche and asked Tabbara if he wanted to be the one to remove the handcuffs from Dimanche, by stating:

You want to do it?

243. Tabbara refused to take the handcuffs off of Dimanche.

244. Massicotte ordered that Dimanche be released from custody and Dimanche returned to the house.

245. Massicotte instructed Frey, Hamner, and Carter to leave the premises, especially if they were up to “something fishy”. Massicotte advised the siblings to seek a “civil remedy” if they wanted to dispute Dimanche’s claim to the property.

246. Tabbara had a grudge against Dimanche after jumping the gun with no information and detaining Dimanche before being forced to see Dimanche being released by his supervisor.

247. Before Frey, Hamner and Carter could leave, Tabbara congregated with them and hatched a scheme to have to have Dimanche arrested under fraudulent pretenses. Specifically, Tabbara stated to Frey:

Here’s the good part: If you can work with one of our detectives and just say that it was fraud, we have all of his information!

248. In response to this proposal, Hamner stated:

She’ll do it!

249. In response to this proposal, Frey stated:

Are you kidding me? You got it!

250. Together, Frey, Hamner, Carter, Tabbara and Manganiello jointly scrutinized Dimanche's papers, personal identification and private information while devising ways to use that information to have Dimanche arrested in the future.

251. The plan agreed to by Tabbara, Frey, Hamner and Carter was executed when Jackson, who was acting as a co-conspirator in the kidnapping scheme, applied for an arrest warrant for the arrest of Dimanche, with the approval of Carpenter, and the furtherance of the embezzlement efforts of Lowndes, Dymond and Frey. Jackson deliberately omitted pages from the warrant application that she knew to be false, with the approval of Carpenter, and Carpenter presented the application to the court knowing that he was not an authorized taker of oaths under Florida law while fraudulently presenting himself to be so. Beamer was also in on this plan after having consulted with Frey, and excusing Carpenter for not being an authorized taker of oaths under Florida law. All Beamer required was a piece of paper with Dimanche's name on it, and he would sign the warrant for the sake of his friends at Lowndes, even if he had to sign it a day after the home invasion based on the warrant and after the Plaintiff had bonded out of jail after being kidnapped.

Full-scale Armed Home Invasion

252. On November 20th, 2022, two weeks after the events stemming from Hamner's call to police, Dimanche took his three children to visit their grandparents. While he was gone, Hamner, Frey, Cortes, Cortes 2, Goss and Fellows broke into Dimanche's home with firearms, searched the entire residence, changed the locks and gave possession of the property to Hamner. This was a direct result of Beamer's advance communications with Frey about how to execute the plot.

253. The Defendants did not have an arrest warrant at the time. While Cortes, Cortes 2, Goss and Fellows are municipal police officers, no existing law gives any of them the authority to execute arrest warrants in any way. These Defendants did not have a search warrant, and classified the home invasion as "Routine" and "Officer Initiated". These Defendants did not have a court order to seize the property from Dimanche's possession.

254. This home invasion occurred under the supervision of Massicotte, and at a deposition conducted under oath, Tabbara gave testimony that both he and Alban might have participated in the home invasion, even though their names are not listed amongst the officers involved in the Incident Reports documented in relation to the home invasion.

EXHIBIT O - Case Report from Adam Cortes

Orlando Police Department	
CASE REPORT SUPPLEMENT	
1250 W South St	
Orlando, FL 32805	
CASE# 2022-00394672	
REPORTING DATE	REPORTING OFFICER
11/20/2022 15:15	34419 - CORTES, ADAM
<p>On November 20, 2022, at approximately 1430 hours, I, Officer A. Cortes (34419) responded to 921 South Mills Avenue for an attempt to contact. Upon arrival, I met with the complainant/victim Lauren Hammer in reference to OPD case # 2022-00394672.</p> <p>Assisting officers and I attempted to make contact with Moliere Dimanche (DOB:11/07/87). Officers knocked on the door and were met with no response. A locksmith responded to the residence and was identified as James S Uhran (DOB: 11/27/90). Officers were able to enter the residence and search the residence. No one was inside the residence and Dimanche was not present. The residence was turned over to Lauren Hammer.</p> <p>My body camera was activated.</p>	
NARRATIVE	
OFFICIAL RECORDS COPY	
<p>I swear or affirm the above statements are correct and true.</p> <p>Signature</p> <p>Sworn to and subscribed before me, the undersigned authority, This _____ day of _____</p> <p>Notary Public <input type="checkbox"/> Law Enforcement Officer <input type="checkbox"/> Emp # _____ Orlando Police Department</p>	
OPD Case Supp 2022-00394672 Page 1 OF 1	

Case report demonstrating that OPD forced a home invasion without a warrant and turned the premises over to Lauren Frey-Hammer

The Intent was to Kill Moliere Dimanche

255. The goal of Lowndes, Dymond, Frey and Beamer was to advance the lucrative enterprise of estate and trust embezzlement by any means necessary, including murdering anyone who got in their way. To accomplish this, they enlisted the service of Orlando police officers with a history of killing Black men with impunity.
256. On May 6th, 2009, Alban shot and killed a Black man, Vales Delices after Delices tried to enter valet parking at a night club going the wrong way. After being told to turn his car around by a valet car parker, Delices accidentally struck a pedestrian and attempted to flee the scene. Alban shot and killed him as Delices tried to flee the scene. Delices was unarmed.
257. On June 10, 2013, Goss shot and killed a Black man, Joseph Paige, after he and other officers had drawn guns on Paige while looking for someone else. While searching for a robbery suspect, they encountered Paige in what has been classified as a “coincidence” and killed him. Paige was allegedly in possession of a BB gun at the time, and **not at all involved in the robbery** the officers were supposed to be responding to.

EXHIBIT P - Report by U.S. Gun Violence

[HOME](#) [ABOUT](#)

Killed – Joseph Paige (Orlando, FL)

[Leave a reply](#)



The armed man who was fatally shot by Orlando police officers as he stood in the middle of Interstate 4 on Monday, has been identified.

The deceased is 24-year-old Joseph Paige, from New York.

Four police officers who were involved in Paige's killing are expected to be relieved of duty with pay, pending an administrative review.

They are:

Officer Aaron Goss, hired in 2008

Officer Michele Edwards, hired in 2013

Officer Blake Broadhurst, hired in 2008

Officer Greg D'Amato, hired in 2002

It is not clear how many shots were fired to take down Paige, but OPD said, officers were forced to engage him based on his actions.

Report on Goss' involvement in the killing of a man who was not involved in any crimes.

258. On May 21st, 2014, Goss shot and killed another Black man, Jermassioun Viondry Rodgers after pinning a stolen car Mr. Rodgers was driving between Goss's cruiser and a tree. Rodgers had existed

EXHIBIT P continued

Officer Mongelluzzo also gave a sworn taped statement as to his observations and actions. He advised, as they were nose to nose with the stolen vehicle, he could clearly see two suspects inside the vehicle. Both suspects were wearing black masks at the time of contact. He also stated, *"I looked at the passenger and I noticed in his right hand a long gun and him trying to lift it up... At that point, being stuck in the car and in such close proximity, I was extremely in fear for my life and the life of my partner; I jumped out of the car."* Mongelluzzo went on to

unholstered, I started shooting from the hip, two shots and I shot one in the windshield... I saw he (the passenger) was moving out of the car and I shot another couple towards the door, " [sic]

Report from Defendant Jeff Ashton that deleted partial testimony from Goss' partner, Officer Mongelluzzo related to the killing of Rodgers.

the vehicle, unarmed, before Goss shot him twice, killing him, and then fired additional shots as Rodgers lie deceased on the ground.

EXHIBIT P continued



Rodgers, who was unarmed and still killed by Goss.

259. Given the state attorney's pattern of justifying these killings, Orlando is not a safe place for Black men who encounter police, especially under circumstances wherein police officers are summoned for suspected criminal activity, whether it is true or **falsely reported**.
260. Hamner's racist and unnecessary emphasis on Dimanche's race only added fuel to the fire, and as at least three dead Black men shared encounters with the same police officers who invaded the Plaintiff's home, Dimanche certainly would have been killed if he were present at the time of the race-based home invasion.

Unusual Phone Call to 911 and First Actual Kidnapping

261. On November 20th, 2022, Dimanche returned home to find that the locks had been changed on the home and the security codes had also been changed. He immediately took his family to safety and called 911 as he returned to Mills Avenue.
262. He parked his car across the street from the residence as he informed Jane, the 911 operator, that he wished to report a burglary to his residence.
263. Jane knew about the home invasion and inquired as to why Dimanche was not home when the home invasion took place. This revelation was frightening and Dimanche concluded that Jane was a part of

Lowndes's, Frey's and Dymond's scheme to advance their embezzlement efforts.

264. Sensing danger, the Plaintiff tried to throw Jane off when she asked what kind of car he was sitting in. Jane even asked about Frey before sarcastically promising to send help. Instead, Jane sent Montes, Doe #1 and Doe #2 to kidnap the Plaintiff, steal his mail, and steal his car. The phone call sounded like a scene from a Hollywood thriller wherein the victim learns that the person on the phone is actually inside the house. Unfortunately, this was not a Hollywood movie, it was reality for Dimanche.
265. As Orlando police officers arrived on Mills Avenue, the Plaintiff exited his car and walked toward them with an envelope containing his deed to the property in his pocket.
266. Dimanche identified himself as the person who called 911 for help and Montes pointed a bright flashlight in Dimanche's eyes, blinding him. Montes would not take the flashlight out of Dimanche's face until their warrant search system updated to show an active warrant.
267. The system never reflected an active warrant, but Montes, Doe #1 and Doe #2 still kidnapped the Plaintiff anyway. Doe #1 took the Plaintiff's mail out of his pocket and told Montes he was going to

destroy it. Montes encouraged him to do so, and Doe #1 took the deed and Dimanche never saw it again.

268. Doe #2 spotted the Plaintiff's car parked across the street from the residence and took possession of the vehicle before having it towed away for no reason by Johnson's Towing Company. Dimanche pleaded for 15 minutes to arrange for someone to pick up the vehicle and Montes denied those pleas.
269. These three Defendants denied the Plaintiff access to his credit cards, cash and phone, ensuring that getting out of jail would be challenging for Dimanche.
270. The warrant from Beamer was not signed until the next day at 12:06 PM on November 21st, 2022. The kidnapping occurred at 11:12 PM on November 20th, 2022, 12 hours and 54 minutes before the warrant was active. **The Plaintiff had already bonded out of jail before the warrant was signed.**
271. To disguise the kidnapping, when Montes transported Dimanche to the Orange County Detention Facility, Montes signed the ICJIS affidavit under oath, lying that he had arrested the Plaintiff pursuant to a "Signed warrant" in a narrative box designated for "an Orange County Deputy".

EXHIBIT Q - Affidavit from Nicolas Luciano Montes

11/21/2022 9:12 AM FILED IN OFFICE OF TIFFANY M. RUSSELL CLERK OF CIRCUIT COURT, ORANGE COUNTY, FL

Orange County		ICJIS Warrant Arrest Affidavit		Division #: 10	
<input type="checkbox"/> Writ <input type="checkbox"/> VOP <input type="checkbox"/> Fugitive <input checked="" type="checkbox"/> FTA <input type="checkbox"/> Other	Document #: 1002547				
Document Date: 11/20/2022			Court Case #: 2022-00394672 <i>2022 CF 13561 A</i>		
Location of Defendant Vehicle: JOHNSONS TOWING		Date-Time Booked: 11/20/2022 23:45	Agency Case Number: 2022-00407544		
(ORI) : FL0480400 <input type="checkbox"/> Agency: Orlando Police Department		FCIC/NCIC Check: <input checked="" type="checkbox"/> Date-Time of Arrest: 11/20/2022 23:12			
Address of Arrest: 921 S MILLS		Total Bond Amt: _____		Bond Status: _____	
DEFENDANT		Adult <input checked="" type="checkbox"/> Juvenile <input type="checkbox"/> Juicer <input type="checkbox"/> Name: DIMANCHE, MOLIERE JR	Inmate Number: 22027206		Language: ENGLISH
(L.F.M): _____		A.K.A: _____		Race: B Sex: M DOB: 11/07/1987 Age: 35	
Height: 6'00" Weight: 180 Hair: BLK Eyes: BRO POB: _____		POB City: _____		POB State: _____	
RES Street#: 2518 BON AIR DRIVE		City: ORLANDO State: FL Zip: 32805		Home Phone: _____ Other Phone: _____	
Scars/Tattoos: _____		Citizenship: _____ Ethnicity: NON HISPANIC			
Driver's License/ State ID No: d552-540-87-407-0		State: FL Year Expires: 2024	SSN #: _____		
Business and Occupation: _____		Bus Phone: _____			
Bus Street#: _____		City: _____		State: _____ Zip: _____	
Next of Kin Name: _____		Phone: _____			
Next of Kin Street #: _____		City: _____		State: _____ Zip: _____	
Out of State Warrant Arrest: Book as Fugitive from Justice, FSS 941.14, JIT 941.02 NO BOND					
OFFENSES:	<input checked="" type="checkbox"/> Felony	<input type="checkbox"/> Misd.	<input type="checkbox"/> ORD.	<input type="checkbox"/> Traffic	<input type="checkbox"/> Out of County
Original Agency: ORLANDO POLICE DEPARTMENT	Original Agency Case Number: 2022-00394672		Court Location: CIRCUIT Domestic Violence? N		
Name / ORI: _____		Count _____		Originating State: ORANGE/FL and/or County: _____	
1 UNLAWFULLY FILE FALSE DOCUMENT OR RECORDS AGAINST REAL/PERSONAL PROPERTY		817.535(2)(A)	1	2,000.00	FSS: 817.535.2a
2 FRAUD-IMPERSON-USE ID OF ANOTHER>50K		817.568(2)(C)	1	2,000.00	FSS: 817.568.2c
ORIGINAL OFFENSE IF KNOWN ON VOP, FUGITIVE, FTA ONLY					
<input type="checkbox"/> I, being an Orange County Deputy, read and executed the above capias to the above named defendant.					
NARRATIVE:					
Signed warrant					
Sworn to (or affirmed) and subscribed before me by means of <input checked="" type="checkbox"/> physical presence or <input type="checkbox"/> online notarization this 20 day of November year 2022 by _____			I swear or affirm the above statements are correct and true (321) 235-5300 Officer's Signature _____ Officer's Bus. Phone No. LUCIANO MONTES, NICOLAS / 35791 Officer's Name/ID _____		
Notary Public <input checked="" type="checkbox"/> Law Enforcement or Corrections Officer <input type="checkbox"/> Personally Known <input checked="" type="checkbox"/> Produced Identification <input type="checkbox"/> Type of Identification _____			_____		
Notary Signature _____			WILLIAMS, LESLIE S Notary Name _____ Notary Commission # / Exp. Date HH321702 / 10/12/2026		

1001 (09/12)

Page 1 of 1

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This doctored affidavit shows the fake court case number 2022-00394672 that was devised by Montes against the handwritten real court case number and division that was later added by Tiffany Moore Russell.

272. At that time, Montes knew he did not have a “Signed warrant”, he knew he was not “an Orange County Deputy” and knew he had no authority to execute arrest warrants under Florida law. He knew he had just performed a kidnapping of Dimanche in order to further the embezzlement efforts of Lowndes, Dymond and Frey.

Prosecutorial Misconduct

273. Prosecutor Richard Wallsh is a loyal friend, in a position of power. When his good friend and former landlord, Roni Elias, who is White, was criminally charged with grand theft over a property dispute almost identical to the property dispute between the Plaintiff and Frey, Wallsh quickly raised the issue of having a conflict of interest with Governor Rick Scott so that Mr. Elias would not be prosecuted by prosecutors for the Ninth Judicial Circuit. His reasoning was that he had “consulted” Mr. Elias regarding both the criminal charges against him, and a civil action against him, despite Wallsh having *never* been a criminal defense attorney nor retained as counsel for Mr. Elias. The fake conflict of interest worked and Mr. Elias was not convicted. Mr. Wallsh would later testify that it was the former state attorney who had the conflict of interest, information he did not relay to Governor

Scott when he ensured the disqualification of the State Attorney's Office for the Ninth Judicial Circuit.

EXHIBIT R - Executive Order 13-60

Case 6:23-cr-00031-CEM-DCI Document 15-8 Filed 03/30/23 Page 1 of 3 PageID 327
Case 6:23-cr-00031-CEM-DCI Document 8-4 Filed 03/27/23 Page 1 of 3 PageID 243

EXHIBIT - D

STATE OF FLORIDA
OFFICE OF THE GOVERNOR
EXECUTIVE ORDER NUMBER 13-60

WHEREAS, the Honorable JEFFREY L. ASHTON, State Attorney for the Tenth Judicial Circuit of Florida, has advised Governor RICK SCOTT that Roni Elias has been charged with grand theft first degree and scheme to defraud; and

WHEREAS, the Honorable JEFFREY L. ASHTON has also advised the Governor that just prior to his election as state attorney his Executive Director Richard Wallsh consulted with the defendant's family regarding this case and the related civil case; and

WHEREAS, the Honorable JEFFREY L. ASHTON, to avoid a conflict of interest or any appearance of impropriety, has voluntarily disqualified himself and has requested the executive assignment of another State Attorney with respect to the investigation and prosecution of this case and all related matters; and

WHEREAS, the Honorable JERRY HILL, State Attorney for the Tenth Judicial Circuit of Florida, has agreed to accept an executive assignment in this matter; and

WHEREAS, it is in the best interest of the State of Florida and of the ends of justice that the Honorable JERRY HILL discharge the duties of the Honorable JEFFREY L. ASHTON, pursuant to Section 27.14, Florida Statutes;

NOW, THEREFORE, I, RICK SCOTT, Governor of Florida, in obedience to my solemn constitutional duty to "take care that the laws be faithfully executed," and pursuant

to the Constitution and laws of the State of Florida, issue the following Executive Order,
effective immediately:

Section 1.

The Honorable JERRY HILL, State Attorney for the Tenth Judicial Circuit of Florida, referred to as the "Assigned State Attorney," is assigned to discharge the duties of the Honorable JEFFREY L. ASHTON, State Attorney for the Tenth Judicial Circuit of Florida, as they relate to the investigation, prosecution and all matters related to Roni Elias.

Section 2.

The Assigned State Attorney or one or more Assistant State Attorneys and Investigators, who have been designated by the Assigned State Attorney, shall proceed immediately to the Tenth Judicial Circuit of Florida, and are vested with the authority to perform the duties prescribed herein.

Section 3.

All residents of the Tenth Judicial Circuit are requested, and all public officials are directed, to cooperate and render whatever assistance is necessary to the Assigned State Attorney, so that justice may be served.

Section 4.

The period of this Executive Assignment shall be for one (1) year, to and including February 25, 2014.

Section 5.

The Assigned State Attorney shall notify the Governor on or before January 25, 2014, if additional time is required.



IN TESTIMONY WHEREOF, I have hereunto set my hand and have caused the Great Seal of the State of Florida to be affixed at Tallahassee, this 25th day of February, 2013.

A blue ink signature of Rick Scott, Governor of Florida, followed by the title "RICK SCOTT, GOVERNOR".

ATTEST:

A blue ink signature of Ken Detmer, Secretary of State.
SECRETARY OF STATE

274. While the allegations against Mr. Elias actually revolved around forgery, the Plaintiff had identical charges, absent the forgery component. While Wallsh lied to protect a White defendant from such accusations, Wallsh drastically increased the charges against the Plaintiff, only after the Plaintiff filed this lawsuit against Wallsh's good friend Frey.

275. Wallsh intended to keep the efforts of Lowndes, Dymond and Frey a secret, and free of prosecution, just as he had ensured the same for Mr. Elias. Stokes vehemently assisted Wallsh with these efforts and lied about the relationship between Wallsh and Frey in open court, in this very court house.

276. Stokes also pushed the same false narratives as Wallsh in an effort to assist his good friend Diamond in prevailing in **this Civil Rights action**, another undisclosed relationship at the fault of Stokes, who has also repeatedly given money the Diamond's election campaign.

277. While Wallsh made it known that he knew Roni Elias, even when nobody asked, he made no mention of the fact that he also knew Frey. He increased the degree of the criminal charges against the Plaintiff in an effort to intimidate the Plaintiff into dismissing **this Civil Rights complaint**, until the Plaintiff exposed his relationship with Frey to the

Florida Bar, which resulted in Wallsh being removed from that

EXHIBIT S - Conflict of Interest Photograph

Case 6:23-cr-00031-CEM-DCI Document 15-22 Filed 03/30/23 Page 1 of 1 PageID 346
Case 6:23-cr-00031-CEM-DCI Document 1-9 Filed 02/27/23 Page 1 of 1 PageID 37

EXHIBIT S



Left to right): Alan M. Gerlach, Tommy Boroughs, Phillip J. Sheehe, Usher L. Brown, Lyzette SanGermain, Julia L. Frey, Mary Doty Solik, Richard Wallsh, William A. Davis, John Fisher.

Richard Wallsh photographed together with Julia Frey
criminal prosecution, *on paper*.

278. The Plaintiff was entitled to be free from the racist and selective prosecution, however, Wallsh tentatively hatched a scheme on how to *not* make the prosecution look so racist: assign a Black attorney to the prosecution.

The Unauthorized Prosecutor

279. While nobody knew exactly who Andrew Edwards was at the time, or what he was doing in the State Attorney's Office, Edwards had access to the official seal of the State Attorney's Office in all of his email correspondences, he signed void charging Informations in the name of then-serving state attorney Monique Worrell and on behalf of the State of Florida, made himself present at a deposition, made objections on behalf of the State of Florida, filed a demurrer on behalf of the State of Florida, negotiated plea deals on behalf of the State of Florida, moved to quash subpoenas on behalf of the State of Florida, secured convictions on behalf of the State of Florida, and even met with the Plaintiff at Starbucks to discuss a resolution, not to the criminal case, but for ***this specific Civil Rights action.***

280. At every step of the way, Edwards was committing fraud as he was not authorized to prosecute cases in the Ninth Judicial Circuit, having never been appointed as an assistant state attorney by Monique

EXHIBIT T

Case 6:22-cv-02073-CEM-DCI Document 110-1 Filed 08/18/23 Page 2 of 4 PageID 727

CONFIRMATION FROM FLORIDA SECRETARY OF STATE

Yahoo Mail - RE: Assistant State Attorney Appointment

8/16/23, 11:16 AM

RE: Assistant State Attorney Appointment

From: Public Records (publicrecords@dos.myflorida.com)

To: moliereexpressions@yahoo.com

Date: Monday, August 7, 2023, 04:30 PM EDT

Requestor,
A search of our records shows no responsive records to your request for the appointment of
Assistant State Attorney Andrew Edwards by Monique Worell.
We do have Oaths of Office for Assistant State attorney Andrew edwards but the are not current
(2005-2017) and one for Andrew Edwards Jr. from 2002. Both are for the 11th Judicial Circuit. If any of these appears to be the records you seek, please be specific as to which you would like us to provide.
Respectfully,

Office of the General Counsel, Public Records
FLORIDA DEPARTMENT OF STATE
R. A. Gray Building, Suite 100
500 South Bronough Street
Tallahassee, Florida 32399
Phone: (850)245-6507
Fax: (850) 245-6127

Note: This response is provided for reference only and does not constitute a formal legal opinion or representation from the sender or the Department of State. Parties should refer to the Florida Statutes and applicable case law, and/or consult an attorney to represent their interests before relying upon the information provided.

In addition, Florida has a very broad public records law. Written communications to or from state officials regarding state business constitute public records. Public records are available to the public and media upon request, unless the information is subject to a specific statutory exemption. Therefore, any information that you send to this address, including your contact information, may be subject to public disclosure.

From: Molire Dimanche <moliereexpressions@yahoo.com>
Sent: Tuesday, July 11, 2023 10:02 PM
To: Public Records <PublicRecords@Dos.myflorida.com>
Subject: Assistant State Attorney Appointment

https://mail.yahoo.com/d/search/keyword=general%2520counsel%2520andrew%2520edwards/messages%3f17163?reason=invalid_cred

Page 1 of 2

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Confirmation from Florida Secretary of State that Edwards was an unauthorized assistant state attorney.

106 of 211

Worrell, and everything he has done in the Ninth Judicial Circuit over the last three years as a fake prosecutor is *void*.

281. Florida's Secretary of State confirmed that Monique Worrell *never* appointed Edwards to prosecute cases in the Ninth Judicial Circuit (Exhibit T), thus confirming that Edwards had absolutely no lawful authority to do so, and no judge nor any judicial proceedings were vested with the power, nor jurisdiction, to validate the void actions taken by Edwards.
282. Wallsh's use of Edwards as front to hide a racist prosecution resulted in a successful mask for the racially motivated prosecution, and directly resulted in a successful extortion plot, two kidnapping schemes, and two separate cases of obstruction of justice affecting the integrity of the appellate courts in Lakeland, Florida, and in Atlanta, Georgia, all to the detriment of the Plaintiff. The laws of the United States and the State of Florida seek to preclude actions by gangsters and kidnappers posing as prosecutors by ensuring that they have no powers to prosecute until they are appointed by the elected state attorney and those appointments are recorded publicly, as due and prescribed by law. As confirmed by the Secretary of State, Edwards had no such appointments by Monique Worrell.

283. The first fraudulent act of Edwards as an unauthorized prosecutor occurred on Thursday, June 1st at Dispute Resolution Services located at 200 E. Robinson Street in Orlando, Florida. The Plaintiff summoned Tabbara for a sworn deposition to answer for the lies he told in relation to his role in the furtherance of the embezzlement scheme orchestrated by Lowndes, Dymond and Frey. Edwards attended the deposition, fraudulently portraying himself as a prosecutor in the Ninth Judicial Circuit. Edwards would have been excluded from the deposition if the Plaintiff had known at the time that he was a fake prosecutor.

284. Initially, while seated in the waiting area, Edwards instructed Tabbara **not** to enter the deposition room. Then, he told Tabbara **not** to get up from his chair as he tried to reason with Dimanche as to why the deposition should be rescheduled to a later date. Then, he outright **refused** to bring Tabbara into the deposition room altogether.

285. The Plaintiff was left with no choice but to go into the deposition, turn on the camera, and leave it running, anticipating security for the building coming to tell him that the time he reserved for the room was over, after spending hundreds of dollars to secure the attendance of an authorized taker of oaths and a camera man. It was only then that

Edwards unwillingly walked Tabbara into the deposition room, 5 minutes later.

286. During the deposition, Edwards sought to sabotage Dimanche's efforts

EXHIBIT U



Rabih Tabbara deposition with Andrew Edwards fraudulently acting as Assistant State Attorney

to procure discovery evidence by making unlawful objections and directing Tabbara throughout the testimony **not** to answer certain questions. However, despite the fake prosecutor's best efforts to thwart the deposition, Tabbara's testimony revealed that:

- Tabbara lied in his report about a statement he claimed under oath was made by Dimanche;
- Tabbara unlawfully detained Dimanche;

- Tabbara unlawfully searched Dimanche;
- Tabbara may have participated in the home invasion;
- Tabbara's investigation concluded that no fraud had ever been committed by Dimanche;
- Tabbara omitted his unlawful detention of Dimanche from his police report;
- Tabbara lied about Hamner's forcible entry into the residence;
- Tabbara may have discovered too late that Frey was the one committing crimes;
- Tabbara perjured himself during the deposition regarding how he reported the events of November 10th, 2022 being a burglary;
- Jackson repeated all of the same lies contained in Tabbara's report, verbatim in her own affidavit;
- Tabbara racially profiled Dimanche.

287. This is when Edwards knew that Wallsh's prosecution had failed.

However, he had a plan: **change the charges.**

288. Florida's Rules of Criminal Procedure does not permit charging documents to be amended to include new offenses, and no such jurisdiction exists that allows a prosecutor, and especially not a fake

one, to do so. Edwards did so anyway and falsely declared that he had done so in good faith.

289. On the same day as the deposition, Tabbara was released and escorted out of Dispute Resolution Services by his attorney. Edwards, flanked with armed security guards from the state attorney's office, pulled Dimanche to the side and discussed the outcome of the deposition. Edwards concluded that it was a disaster, and repeatedly asked himself:

Why did they do this to me?

290. He stated that there was no way he would allow a jury to see Tabbara and stated that he would no longer be calling him as a witness. He also confessed that he could **not** prove a "taking" and therefore could not pursue the Grand Theft charge imposed by Wallsh. In light of the fact that he could not establish the "taking", there was no way to prove fraud.
291. Edwards concluded that he could pursue *Trespassing*, at best, but only if he could prove Dimanche leased the property to another person after making the adverse possession claim. Dimanche informed Edwards that he had been granted a homestead exemption, thus

foreclosing any charges for trespassing, and Edwards asked himself again:

Why did they do this to me?

292. Edwards got a firsthand look at what happens when people who tell lies are forced to answer for those lies under oath and directed all of the other witnesses, who also told lies, **not** to show up for their scheduled depositions, even if under the force of subpoena.
293. Jackson was under subpoena to testify. Frey was under subpoena to testify. Hamner was under subpoena to testify. All three individuals defied their subpoenas and did not show up to testify when ordered to do so. As a result, Dimanche moved the court to hold all three of these individuals in contempt of court for defying their subpoenas and refusing to testify.
294. On July 18th, 2023, Dimanche sought to hold the witnesses in contempt, and this prompted Edwards to orchestrate a scheme to have Dimanche kidnapped and jailed indefinitely.

Starbucks Extortion Attempt

295. On July 15th, 2023 Edwards called the Plaintiff and stated that he wanted to meet at Starbucks. Specifically, Edwards stated:

No emails, no court filings, no paper. Let's cut straight to the chase.

296. At 11:57 AM that same day, Dimanche arrived at the Starbucks behind the Orange County Courthouse located at 411 N. Magnolia Avenue in Orlando, Florida. Edwards entered the Starbucks at 12:00 PM.
297. He purchased Dimanche a double-shot espresso, however, Dimanche did not drink it after Edwards instructed the barista to add an additional shot to Dimanche's drink.
298. Dimanche pretended to drink the espresso as Edwards explained why he really wanted to meet in-person.
299. Edwards explained that Frey was a rich woman who did not know how to accept being challenged, but that she had enough power to make one phone call and cause him to lose his job. He explained that he knew that Frey was taking advantage of our most vulnerable senior citizens and exploiting them financially, but that he could not do anything about it.
300. He stated that Frey was a personal friend of "Rick Wallsh" (Wallsh) and that Wallsh had assured her that he would help Frey "introduce a

new set of facts” into **this Civil Rights action** that would prevent her from being sued by Dimanche.

301. Edwards explained that the only way to do that would be to ensure that Dimanche pled guilty in some way, and in exchange for a plea of guilt, Dimanche would not be penalized.
302. When Dimanche declined that proposal, Edwards used an analogy from the movie Roots to describe the Plaintiff’s initiation of **this Civil Rights action**. He said that in order to catch a monkey who moves too fast, place a shiny object inside of a cage. The monkey would then grab the shiny object, and you would have an opportunity to close the cage and capture the monkey.
303. Dimanche interpreted this racist trope as a message directly from Wallsh, likening the Plaintiff to a monkey, a practice with a long history in America’s Jim Crow Era of dehumanizing Black people by comparing them to apes. It confirmed that Edwards was simply an extension of Wallsh’s **selective prosecution**, especially as Edwards held the view that Lowndes, Frey and Dymond should wait for “Karma” for their crimes against the elderly, while Dimanche should plead guilty when he committed no crime.

304. Dimanche interpreted this as a threat by Edwards implying that Dimanche's pursuit of justice and **asserting his Civil Rights in this action** would lead to his imprisonment in a cage.
305. Dimanche was highly offended, and this outrageous insult prompted Dimanche to defend himself, more than ever, against the racist prosecution, and Dimanche left Starbucks intent on defeating the accusations in court.

Disqualified Judges Assisting in the Embezzlement Efforts

306. Judges hold one of the most important roles in our community. The most important role they have is upholding the Constitution, and when they refuse to do so, they commit treason against the Constitution. When judges act as trespassers of the law, all rulings are null and void.
307. Blechman, Navarro, Calderon, and Beamer participated in the furtherance of the embezzlement efforts of Lowndes, Frey and Dymond. While technically under the color of the authority of Ninth Judicial Circuit Court judges, these Defendants also committed acts outside of their roles as judges to further the criminal enterprise established by Lowndes, Frey and Dymond, and harm the Plaintiff.

308. Blechman is a judge who is disqualified under the Constitution from presiding over any actions involving both Dimanche and Frey. As such, he had no jurisdiction in any such proceeding.
309. Despite knowing that he had no jurisdiction to preside over these proceedings, Blechman kept 1) his personal friendship with Frey, 2) his wife's close friendship with Frey, and 3) his personal friendship with Wallsh a secret for more than six months, before voluntarily disqualifying himself after this information was made known, on May 24th, 2023, 186 days after the Constitution disqualified him.
310. During the six months Blechman exercised jurisdiction he did not have, he violated Dimanche's right to a speedy trial so that Wallsh could have more time to destroy evidence that would have helped Dimanche prevail against the allegations, and tilted the proceedings in favor of his friend Frey so that Wallsh's plan to "introduce a new set of facts" **in this Civil Rights action** would be successful.
311. While Blechman disqualified himself on paper, he exercised tentative control over the case in the same manner Wallsh did so by making Edwards the face of the prosecution: Blechman made Tarlika Nunez-Navarro the face of the proceedings.
312. Navarro had published to her **personal Instagram account** a quote from Blechman wherein Blechman professed that he *only* trusted **one**

judge in the Ninth Judicial Circuit to sit in his place in his absence because it would be as if he never left, and that that judge was Navarro.

313. Immediately upon being assigned to replace Blechman by Calderon, Navarro **deleted** the Instagram post and put her page on private. This was done to prevent the Plaintiff from raising the issue of Blechman tentatively controlling the case so that Frey and Wallsh would achieve their efforts to “introduce a new set of facts” **into this Civil Rights action.**

EXHIBIT V

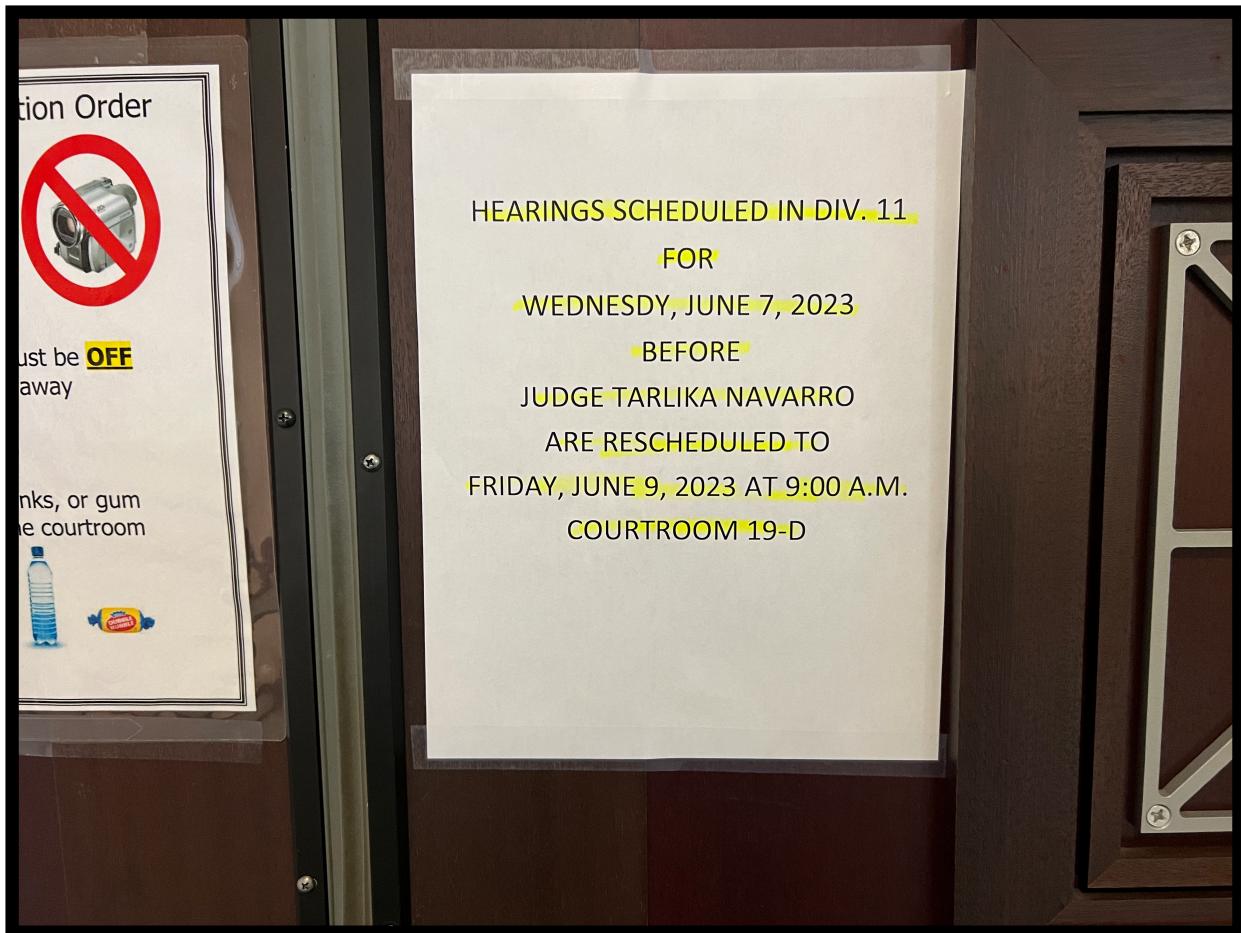


Sign taped to Navarro's door to mislead Plaintiff about where to go for his court date.

314. This obstruction of justice and destruction of evidence was accomplished while Navarro was not functioning as a judge.

315. While Navarro did many things under the color of law to deprive Dimanche of his Civil Rights, including changing the name of the “Arraignment” proceedings the same day he filed a pre-arralgnment Motion to Dismiss so that the Motion would no longer be “pre-arralgnment”, the most alarming act was her attempt to have the Plaintiff kidnapped.

EXHIBIT V continued



316. On Wednesday, June 7th, 2023, without warning or notice, Navarro posted a sign on the outside of her courtroom door and highlighted, with a **yellow highlighter**, the message:

HEARINGS SCHEDULED IN DIV. 11

FOR

WEDNESDAY, JUNE 7, 2023

BEFORE

JUDGE TARLIKA NAVARRO

ARE RESCHEDULED TO

FRIDAY, JUNE 9, 2023 AT 9:00 A.M.

COURTROOM 19-D

317. This message was a false public notice. As the Plaintiff attempted to open the door, a deputy clerk was silently waiting on the other side of the door with the lights off, anticipating the Plaintiff's arrival for his scheduled court date.

318. She was peeking through the crack in the door as she waited for the Plaintiff, and when she saw him, she opened the door and said:

You're the pro se. Court's been cancelled. Your hearing had to be changed to "Determination of Court Dates". Come back on Friday.

319. This individual knew that there was no court date set for Friday. It was a trap. The *real* court date had been secretly set for **Thursday, June 8th, 2023** and the sign, along with the waiting person was designed by Navarro to trick the Plaintiff into **not** showing up on Thursday so that he could be arrested on Friday for failure to appear.
320. This unusual exchange alerted Dimanche that something was terribly off about the proceedings and that it had something to do with the pre-arraignment Motion for Dismissal he filed. As he was leaving the courthouse, he saw Edwards walking down N. Magnolia Street and asked him why he wasn't in court. Edwards seemed shocked that Dimanche was aware that he was more than 30 minutes late for the Arraignment, but seemed shocked at the fact that the Arraignment was rescheduled as well, which confused the Plaintiff.
321. This definitely put Dimanche on alert, and the Plaintiff made a decision: **show up every day**. It was the only way to ensure that the Plaintiff didn't fall into the trap.
322. On June 8th, 2023 the Plaintiff was present in Navarro's court room, even though his name was **not** on the docket, and Navarro called his

name. The clerk sought to skip Dimanche but was not aware that he was sitting in the back row. The Plaintiff got up and attended the *unscheduled* Arraignment. Again, Edwards was not in attendance.

323. While Navarro changed the name of the proceedings to “Determination of Trial Dates”, they were executed in the *exact* same manner as all of the other Arraignments for other defendants called before the Plaintiff’s case was called.
324. Had the Plaintiff not been skeptical of 1) the note Navarro posted on the door, 2) the fake instructions from the woman lurking behind the door, and 3) Edwards’s demeanor towards the weird events surrounding the Arraignment, the Plaintiff would not have shown up on June 8th, 2023 and would have had his freedom stolen by Navarro. But there were too many witnesses in court that day for her to issue the warrant because the Plaintiff showed up out of sheer anxiety alone.
325. On July 13th, 2023, the Plaintiff was informed by the office of Florida’s Secretary of State that Andrew Edwards was an **unauthorized prosecutor.**
326. On July 18th, 2023 Navarro and Edwards were provided a copy of a Petition of Writ of Mandamus from the Florida Supreme Court

wherein the Plaintiff sought relief from the fraudulent prosecution in Florida's highest court.

327. Navarro *knew* Edwards was a phony prosecutor the entire time, and Edwards was now made aware that the Plaintiff knew he was a bogus prosecutor.
328. Navarro then disqualified herself from the case before resigning from the judiciary altogether a week later.

Another Kidnapping Plot, Extortion, and a Coverup

329. Without the authority to do so, Calderon took charge of the order of reassignment after Navarro disqualified herself, and assigned himself to preside over the case.
330. Florida law vests the authority of random assignments of cases involving disqualification to either the clerk of court, or the chief judge of the circuit, and Calderon was neither.
331. After reassigning the case **to himself**, the first thing Calderon did was cancel all scheduled court dates in Division 11 before Navarro. Those dates were August 9th, 2023 for Pre-Trial Conference, and August 20th, 2023 for Trial.
332. The next thing Calderon did was issue a warrant for the Plaintiff's arrest for **not** attending the cancelled Pre-Trial court date. Calderon

ensured that where Navarro *failed* to cause the Plaintiff to miss court, he *succeeded*.

333. In issuing the illegal capias, Calderon waived the Plaintiff's right to speedy trial. Calderon knew that Edwards was **not** in attendance for the cancelled court date, and knew that the court had been cancelled by himself. Calderon did not issue the capias on movement by the State, wherein a different prosecutor handling post-conviction proceedings was present, he called a case he knew was not set, did not allow the assistant state attorney to give input on the matter, and issued the capias. Audio of this illegal capias can be found at:

EXHIBIT W - audio of Calderon issuing retaliatory capias

<https://www.youtube.com/watch?v=oSHmgEIpPjE>

334. Calderon *knew* that Navarro had resigned from the judiciary and that there was no judge in division 11.
335. Calderon, as master of his own docket, read the Mandamus petition concerning Edwards and the fraudulent portrayal as an assistant state attorney. Calderon also knew that on August 20th, 2023, he had committed the entire day to post-conviction motions and had already

pulled defendants from state prison for evidentiary hearings and did **not** actually schedule the Plaintiff for trial on that date.

336. The deputy clerks who forfeited the Plaintiff's bond, and who would later admit that they did so "in error", were Rochelle and Hanny.
337. The day after Hanny and Rochelle forfeited the Plaintiff's bond, Edwards, while knowing that he was not a real prosecutor, and after having read the Mandamus petition concerning his fraudulent practices, **called the Plaintiff's phone and left a voice message**.
338. In the voice message, Edwards stated that there are "no foreseeable court dates" in the case.
339. With a warrant for missing a cancelled court date, and no foreseeable court dates in the future, the Plaintiff was trapped, and doomed to sit in the county jail *indefinitely*.
340. Edwards called the Plaintiff again and proposed a way out of the warrant: if the Plaintiff plead ***no contest*** to a trespassing charge, everything would go away and the Plaintiff would be sentenced to time served. Otherwise, the Plaintiff would have to rot in jail.
341. The Plaintiff decided to comply with the extortion, especially when Edwards reminded him of how bad an arrest could affect the Plaintiff's campaign for Mayor of the City of Orlando. Edwards leveraged outright election interference over the Plaintiff's head.

342. The Plaintiff agreed to the extortion. Edwards contacted Calderon and told him that the extortion had been a success.
343. Edwards emailed the Plaintiff drafts of the plea agreement. Before any agreements were signed, Edwards reneged on the deal, because he said Calderon spoke to judge Carlos Mendoza, who wanted the appeal taken against judge Mendoza's ruling in case 23-11383 in the Eleventh Circuit Court of Appeals to be dismissed.
344. The Plaintiff had no choice but to dismiss the appeal in the Eleventh Circuit.
345. The Plaintiff also had to dismiss the Mandamus concerning Edwards acting as a fake prosecutor, which the Supreme Court of Florida transferred to the Sixth District Court of Appeal under case number 6D23-3222.
346. After being extorted into dismissing the appeals, Edwards reneged on the plea agreement *again*, stating that a plea of ***no contest*** would not benefit Frey, and she opposed anything other than a guilty plea. The Plaintiff was subsequently extorted into entering a guilty plea.
347. At the hearing for the plea, wherein the Plaintiff was fingerprinted and humiliated, Edwards and Calderon **joined together in a lie**. This lie asserted, in open court, that Edwards and Calderon were *both* present

in that same courtroom on August 9th, 2023 for pre-trial and that the Plaintiff was the only one who was not present.

348. This lie was crafted by Calderon and Edwards to create the appearance that the State of Florida, through Edwards, was ready for trial on August 9th, 2023, despite Edwards having already confessed that he was not there at all.
349. In furtherance of the embezzlement scheme orchestrated by Lowndes, Dymond and Frey, Edwards and Calderon extorted the Plaintiff into a guilty plea so that “a new set of fact” would be introduced **into this case** to help Frey escape liability to the Plaintiff for violating his Civil Rights. They both extorted the Plaintiff into forfeiting his right to **access to courts** with the dismissals of his appeals.
350. However, Calderon was without jurisdiction to issue the warrant for the Plaintiff’s arrest, Edwards had no authority to prosecute in the name of Monique Worrell on behalf of the State of Florida, and neither of them possessed the power manifest jurisdiction into void proceedings. While they did their best to help Lowndes, Frey and Dymond, it is a fact that the charging Information attested to by Andrew Edwards has no legal effect, and Calderon was without jurisdiction to enter any orders giving it any legal effect.

351. Edwards's prosecutorial efforts are void, and Calderon's orders enforcing that prosecution and seeking to coverup Edwards's fraudulent efforts are just as void.

The Active Warrant and the Bond that Wouldn't Go Away

352. After the plea deal extortion plot was achieved, and as the Plaintiff was leaving the court room, Edwards told the Plaintiff:

I'm going to talk to the clerk, and see if there aren't any warrants floating around out there.

353. This was a veiled threat, and the individual he was referring is Geist, the Director of Court Operations for the Orange County Clerk of Court.

354. Geist supervised and oversaw the bogus bond forfeiture over the cancelled court date.

355. Geist put the Plaintiff's freedom and life at risk by intentionally leaving the warrant Calderon issued for the Plaintiff active after it had been recalled in exchange for the Plaintiff's cooperation with the extortion, intentionally left the bonds active, and refused to close out the case for 11 days after the case was supposed to be closed.

356. On two occasions within those eleven stressful days, the Plaintiff met with Geist and Singh in Geist's office on the 20th floor of the Orange County Courthouse.

357. The Plaintiff explained the risks to his safety with the warrant, bonds and case being active after the case was supposed to be closed.

358. Both of these Defendants stated that they did not understand why the warrants were still active, why the bonds were not discharged or why the case was still open. Singh stated that she would fix the issue right away, while Geist made a fake phone call to Moncrief Bail Bonds and pretended to send out an email to Moncrief about discharging the bond.

EXHIBIT W(a)



Geist pretending to call Moncrief bail bonds at 2:24 PM on August 28, 2023 to discharge the lingering bonds.

359. Moncrief never received a phone call from Geist, and never received

EXHIBIT W(b)



Defendants Latimore (left), Mendoza (second from right) and Calderon (right) fraternizing in their personal time, demonstrating actual personal ties outside of court.

the email about discharging the bond that Geist pretended to send out.

360. One week later, the case was still open, the warrant was still active and the bonds were still active. The veiled threat from Edwards was being executed by Geist and Singh.

361. The Plaintiff visited Geist and Singh again on the 20th floor after multiple efforts to detach himself from the ordeal. This was the Plaintiff's final attempt to address the issue with them, and he

explained that Moncrief had informed him that they never received the phone call Geist claimed she made, and they never received any emails about discharging the bonds. Singh left Geist's office for no more than 15 seconds before returning and explaining that resolving the issue was only "one click away."

362. The 11-day torture period was very dangerous to the Plaintiff as any routine traffic infraction could have resulted in his freedom being taken away unjustly, again, or a potential deadly encounter with law enforcement on the basis of a warrant and bond revocation that should have been discharged and closed out by Geist and Singh 11 days prior. The bonds and warrants were for felonies that the Plaintiff was not convicted of.
363. The 11-day period meant something to Edwards because two crucial deadlines manifested in this Civil Rights action during that time and Edwards did not want the Plaintiff filing those pleadings at all. This is why he enlisted Geist and Singh to provide him with a vehicle to have the Plaintiff incarcerated or killed before those documents could be filed, so that the embezzlement efforts of Lowndes, Dymond and Frey could continue, unchallenged.

Unethical Conduct and further Extortion

364. James Walson is an attorney, a shareholder at Lowndes, a personal friend of Frey, a fact-witness to the events that transpired at the residence located at 921 S. Mills Avenue in Orlando on November 10th, 2022, and a co-conspirator in the home invasion that took place on November 20th, 2022.
365. Walson represented Frey and Hamner in actions Frey pursued and withheld his conflicts of interest in the subject matter of the litigation.
366. Walson withheld the fact that he argued with Massicotte about the decision to release Dimanche from handcuffs and in actual possession of the residence located at 921 S. Mills Avenue.
367. Walson withheld the fact that he begged Massicotte to take Dimanche to jail on November 10th, 2022.
368. Walson withheld the fact that he was involved in the home invasion of November 20th, 2022.
369. In withholding this information, Walson held himself out to be an uninvolved attorney merely representing his clients when he actually had a stake in the outcome.
370. This unethical behavior annihilated the fairness of the proceedings and resulted in Walson using his connections at the Orange County

courthouse to rig the proceedings in favor of his friend, co-worker and fellow shareholder Frey.

371. Walson's unethical behavior resulted in his successful rigging of judicial assignments to litigation he was involved in being assigned almost exclusively to judges Lowndes nominated to the bench.
372. In one instance, he conspired with Thompson to hide the fact that Thompson, who is a judge, was a close friend of Frey, and who co-paneled discussions as a part of a business relationship with Frey and LFI. LFI subsequently served as a laundering tool wherein influence and money were exchanged for favors from the bench. The Plaintiff was a victim of this corrupt partnership.
373. Both Thompson and Walson jointly failed to disclose that Thompson personally benefitted from political donations from another Lowndes shareholder by way of money used to help Thompson's wife seek re-election.
374. As Walson withheld his conflicts of interest and Thompson withheld his own, despite the Constitution disqualifying them both, the Plaintiff was robbed of his right to a fair trial, his rights to due process, his right to access to the courts and his right to freedom of speech. The embezzlement efforts of Lowndes, Frey and Dymond were advanced and the Plaintiff fell victim to their crimes, yet again.

375. In an effort to have ***this Civil Rights action*** dismissed by the Plaintiff, Walson offered to have Wallsh dismiss the criminal charges against the Plaintiff in exchange for the dismissal of ***this Civil Rights action***, which was the purpose of the criminal prosecution the whole time.

376. As all of this was going on, LeBelle took extreme measures to ensure that the pleadings that the Plaintiff filed to combat the efforts of Thompson and Walson were not timely filed. She refused to accept the Plaintiff's documents, prompting the Plaintiff to get back in the waiting queue and ask other clerk's to file his documents, she repeatedly removed the Plaintiff's ticket numbers from the queue so that he would never be called, and repeatedly directed any and all litigation the Plaintiff initiated exclusively to judges on a list submitted by Lowndes to Governor Ron DeSantis for appointments to the bench.

377. Additionally, Geist unlawfully **removed records from the appellate record** relating to the Plaintiff's good-faith pursuit of the appellate process by taking an appeal of the order Walson and Thompson devised together. This was done to obstruct the Plaintiff's efforts on appeal and further the embezzlement efforts of Lowndes, Dymond and Frey.

Discrimination

378. Diamond, Acosta, Wilson, Bradley, Collie, Mercado, Stickle and Smith, have adopted and implemented practices that have deprived the Plaintiff of property ownership, deprived him of property, and deprived him of his right to defend that property.
379. Frey processed a document entitled “Affidavit Regarding Fraudulent Deed” on November 14th, 2022 (Doc. #20220688511) with the Orange County Comptroller falsely claiming under oath that the Plaintiff had filed a fraudulent deed.
380. No action was taken on this document by these defendants until the Plaintiff defended himself in response to the false allegations by filing a counter-affidavit on November 15th, 2022 (Doc. #20220690853), reporting the embezzlement scheme orchestrated by Frey.
381. While these Defendants took no issue with Frey accusing the Plaintiff of fraud, they took issue with the Plaintiff accusing Frey of embezzlement.
382. Acosta was the first to take issue with the Plaintiff’s affidavit and refused to process the affidavit.
383. The Plaintiff demanded that his document be processed and Acosta consulted Wilson who threatened to void the Plaintiff’s deed if he did not leave the office.

384. The Plaintiff again, demanded that his affidavit be processed in the same manner that Frey's affidavit had been processed.

385. Wilson decided to fraudulently transfer the Plaintiff's ownership interest in the residence located at 921 S. Mills Avenue to Frey in an act of reprisal, but first consulted Bradley, who made the ultimate decision to carry out the reprisal.

386. These three Defendants broke the law in many ways to accomplish this, specifically as Florida law requires that deeds be attested to by at least two witnesses.

387. Aside from obstructing the Plaintiff's right to record documents freely within the county records, these three Defendants construed Frey's affidavit, which did not meet Florida's specifications for qualifying as a deed, into a "miscellaneous deed", fraudulently listed Dimanche as the grantor, and unlawfully seized the Plaintiff's property in order to benefit Frey. Mercado finalized the processing of the affidavit into the "miscellaneous deed."

388. After being sued for this conduct on the basis that Florida law does not recognize a "miscellaneous deed", these same Defendants, along with Diamond and Mercado, sought to cover up the act giving rise to their liability in ***this action***.

389. On September 21st, 2023 these Defendants fraudulently listed Dimanche as the “seller” of the property located at 921 S. Mills Avenue to Frey. To cover up their manipulation of the affidavit into a “miscellaneous deed”, these Defendants removed the “miscellaneous deed” and replaced it with a document with the deed code “judgment.”

390. This document is actually an order drafted by Walson granting a Motion for Judgment on the Pleadings. Again, this “deed” is not a recognizable deed under Florida law, and the assertion that Dimanche was the “seller” in the exchange is false. That document drafted by Walson was not a conveyance of any kind, and the order didn’t even purport to adjudge any claim to the property to Frey. The use of that document was simply to cover up the malicious conversion of Frey’s affidavit into a deed as an act of reprisal against the Plaintiff.

391. The actions of these Defendants were motivated by a disdain for Black property ownership, and favoritism toward White property ownership. By impact, the Plaintiff was denied the right to own, keep, or maintain his property based solely on his race, and these Defendants have displayed a consistent pattern of this discriminatory behavior spanning more than a year.

392. The motivations of these Defendants was made known to the Plaintiff when the Plaintiff visited the Orange County Property Appraisers Office to inquire why his affidavit was not treated as a deed the same way that Frey's affidavit was.

393. He encountered Stickle who explained that the reason is because the Plaintiff is Black. Stickle was straightforward about it, and stated that it was simply the truth, that nobody was going to take the word of “some random Black guy” over that of a White attorney with “lawyer connections.” Stickle then informed the Plaintiff that his documents would never be treated the same as Frey’s.

394. As due, when **this Civil Rights action** was initiated the Plaintiff sought to record a *Notice of Lis Pendens* in the county records, as prescribed by law.

395. Smith denied the Plaintiff access to the county records, acting as manager of the Orange County Comptroller.

396. When the Plaintiff asked Smith why he could not record the *Notice of Lis Pendens*, Smith stated that the Plaintiff had been banned from filing documents in the county records.

397. The Plaintiff informed Smith that this was racist and illegal, to which Smith stated:

If I'm wrong, I'll have to answer for that later. But I think I'm right.

398. Smith then told the Plaintiff that if he left his credit card at the office, the fee to process the *Notice of Lis Pendens* could be charged at a later date.
399. The Plaintiff refused to post a bond in order to exercise his right to access to the county records, and did not give Smith his credit card. Smith then demanded that the Plaintiff leave the office.
400. Before the Plaintiff left, he asked Smith who made the final decision to ban the Plaintiff from recording documents in the county records and Smith stated that it was Collie.
401. The Plaintiff filed a complaint with the Florida Bar about Collie's discriminatory behavior. In response to the Bar complaint, Collie confessed that she ordered Smith to ban the Plaintiff from recording documents in the county records, but swiftly backtracked on her decision by claiming that the Plaintiff has not been prevented from recording anything else since that encounter. Smith testified under oath to the same effect.
402. The part about no further obstructions is true, but it is only because a Black man seeking to protect his property has to go to extreme

lengths, such as filing Bar complaints, in order to enjoy the rights afforded to White citizens at the Orange County Comptroller without obstruction and hassle. No law authorized *any* of the actions taken by these Defendants.

403. This discrimination continued as Dimanche attempted to record the Notice of Contest of Lien regarding the Jupiter Hills residence when Smith, Collie and Jane Doe Defendants obstructed his efforts to contest the fraudulent lien. This was done to protect the enterprise.

Weaponizing Law Enforcement

404. City, Smith, Dyer, Rivers, McConnell, Carty, Mina, and Hinds reduced the long arm of the law to a very short one, in a collective effort to 1) prevent the Plaintiff from reporting the crimes for which he was a victim, and 2) protect the embezzlement efforts of Lowndes, Frey and Dymond from facing justice.
405. City, Smith, and Dyer, with the assistance of past state attorneys, and sometimes with the help of Wallsh, have created a dangerous and violent atmosphere for Black people in the City of Orlando by repeatedly hiring and rewarding officers who kill unarmed Black people, and routinely violate the Civil Rights of Black Orlandoans.

406. In an effort to report the fraud, false affidavits, and misconduct surrounding the events at 921 S. Mills Avenue between November 10th, 2022 and November 20th, 2022, the Plaintiff reported the issues to the Internal Affairs unit of the Orlando Police Department.
407. After taking testimony and reviewing the evidence, Carty, acting as the internal affairs investigator, orchestrated a massive coverup with the help of Rivers, McConnell, Dyer and Smith.
408. Carty, after watching the oral testimony of Tabbara from the June 1st, 2023 deposition lied in his conclusion that Tabbara did not commit perjury by false declaration when Tabbara testified in writing that Dimanche made a statement to him that was contradicted by police body worn camera footage.
409. Carty cleared Tabbara of every crime Tabbara committed, and Rivers and McConnell sustained the findings after having been made aware of the same evidence provided to Carty.
410. McConnell advanced the cover up, and further advanced the criminal enterprise established by Lowndes, Dymond and Frey by preventing the release of the damning reports composed by Cortes and Cortes 2 in relation to the home invasion on November 20th, 2022.
411. On July 21st, McConnell intercepted an email the Plaintiff sent to Carty requesting the reports. McConnell then stated that un-redacted

copies of reports could not be made available to the Plaintiff without specifying why. Rivers, Smith, City and Dyer supervised and sustained this method of covering up the issue. These reports were criminally withheld by Wallsh and Edwards in the criminal prosecution as well.

412. For over a year, the Plaintiff sought justice and all of his pleas fell on deaf ears. Every time he went to the Orange County Sheriff's Office to make a complaint, his pursuit of justice was foreclosed by Hinds.
413. Hinds, on at least four occasions between November 20th, 2022 and January 1st, 2024, the most recent on December 19th, 2023, prevented Dimanche from filing a complaint with the Sheriff's Office by first imposing an unlawful pop-quiz on what his complaint was about before telling the Plaintiff he could not file a complaint about issues that did not occur in un-incorporated Orange County because the Sheriff's Office did not have jurisdiction beyond un-incorporated Orange County.
414. This was a lie, as the Sheriff's Office has jurisdiction anywhere in Orange County, including Constitutional concurrent jurisdiction with all municipalities within Orange County. However, this lie was told to the Plaintiff because he is a Black man seeking justice against a White woman who caused him to be a victim of a slew of crimes.

415. Fed up with a year's worth of justice being denied by Hinds, the Plaintiff filed a Professional Standards complaint about her repeated obstruction of his right to file a complaint for events occurring in Orange County.
416. Before the document was even stamped as received, Jane 2 informed the Plaintiff that Hinds had already been exonerated because the Sheriff's Office did not have jurisdiction outside of un-incorporated Orange County. The Plaintiff took note of the fact that White women in the main lobby were provided a comfortable seating area and a desk to file their complaints, while minority complainants were in Professional Standards complaining about not being able to file reports because of Hinds, including Javier Ortiz who sought to file a complaint about about a sheriff's deputy stealing his Chrysler 300C from his house before being told that he could not file that complaint by Jane 2. The Sheriff's Office has a firm policy wherein complaints from non-White victims of crimes will not be accepted.
417. Undeterred by the racist environment at the Orange County Sheriff's Office, the Plaintiff contacted Mina directly by email at john.mina@ocfl.net.
418. On December 19th, 2023 the Plaintiff emailed Mina and attached the bank records from Charles Schwab demonstrating the fraud

committed by Frey in an attempt to finally raise a complaint with the Sheriff's Office. After receiving the email, Mina blocked the Plaintiff's email address.

419. The Plaintiff made two attempts the same day to report the illegal activity of Edwards to Mina and due to Mina blocking the Plaintiff's email address, Mina did not receive those complaints.
420. Mina blocking the Plaintiff's email address was another furtherance of the embezzlement scheme orchestrated by Lowndes, Dymond and Frey. By preventing their activity from being reported, Mina ensured that law enforcement would never investigate the criminal enterprise at Lowndes.
421. By preventing the crimes of Edwards from being reported, Mina ensured that law enforcement would not investigate Edwards and Wallsh for Edwards's unlawful practices in the Ninth Judicial Circuit.
422. It was illegal for Mina to block the Plaintiff's email address as the "@.ocfl.net" email address belongs to the People of Orange County, and not Mina.
423. Mina's blocking of the Plaintiff's email address was furtherance of the efforts of Lowndes, Dymond and Frey and an obstruction of justice.

424. On May 4th, 2023, Handberg was made aware of the criminal enterprise orchestrated by Lowndes, Dymond and Frey, as well as the events that transpired at 921 S. Mills Avenue.
425. Handberg was also provided a very detailed public corruption report outlining the criminal enterprise, and how Frey may have been involved in the death of Qurentia P. Throm for the sole purpose of embezzling her assets.
426. Handberg was provided video evidence in relation to the public corruption report.
427. Upon receipt of this information, Handberg had a duty to present this information to a grand jury and did not do so. This failure to act delayed justice, created more victims, and inadvertently advanced the criminal enterprise operated by Lowndes, Dymond and Frey.

Election Interference

428. Being the victim of so much corruption, a government-sanctioned home invasion, a government-sanctioned theft of property, the annihilation of his Civil Rights, a racist prosecution, false accusations, kidnapping plots and a government-sanctioned extortion effort, the Plaintiff was motivated to run for office and insert righteousness,

integrity and fairness into a local government that is currently the embodiment of tyranny.

429. The Plaintiff declared his candidacy for Mayor of the City of Orlando and campaigned in a good-faith pursuit of his right to vote.
430. Having made a name for himself by engaging the citizens of Orlando and gaining their support, Dyer, Herdocia, Nossair, Alban, City and Cowles jointly conspired to sabotage the Plaintiff's efforts to ask the People of Orlando to vote for him.
431. On July 26th, 2023, after successfully gaining momentum for his campaign, the Plaintiff went to the Magic Mall, located at 2155 West Colonial Drive in Orlando, to gather signature petitions in an effort to engage the Black voters of Orlando.
432. At the direction of City and Dyer, Alban tracked the Plaintiff before making up a fake phone call to 911 about the Plaintiff illegally collecting signature petitions on private property.
433. Under fraudulent pretenses, Alban stated that Waz Khan, the property manager for Magic Mall, called police to report that the Plaintiff was illegally collecting signature petitions for the election.
434. Alban ordered the Plaintiff to "**stop collecting petitions**", in a brazen act of election interference.

435. Prior to leaving Magic Mall, the Plaintiff went to Khan's office to ask about the 911 call. Khan stated that he did **not** call 911 on the Plaintiff.
436. By the time the Plaintiff entered Khan's office, Alban had called Khan and Khan confirmed that he and the Plaintiff had a prior arrangement wherein the Plaintiff would be allowed to collect petitions at the Magic Mall.
437. Khan then informed the Plaintiff that Alban told him that the Plaintiff was blocking the entrance to Magic Mall which prompted Alban to approach the Plaintiff, and this was a lie.
438. This intimidating act of election interference severely damaged the Plaintiff's signature collection efforts and hurt the Plaintiff's morale and motivation toward continuing his campaign for fear of being tracked and harassed by City, Dyer and Orlando police officers in the future.
439. While contemplating whether or not he should give up his campaign, the Plaintiff took a closer look at the Florida election code and learned that these Defendants had illegally imposed the petition collection process and the unlawful qualifying fee on the Plaintiff as an undue burden in a sophisticated scheme to rig the election in favor of Dyer.

440. The incident at Magic Mall and the scheme to rig the election was brought to the attention of Nossair and Herdicia, both of whom declined to report the issues nor take any action to maintain the integrity of the election.

441. In fact, to the contrary, Nossair and Herdicia jointly conspired to falsify the Plaintiff's candidate packet, in furtherance of the conspiracy to interfere with the election by adding documents to the Plaintiff's candidate packet that he did not submit to them.

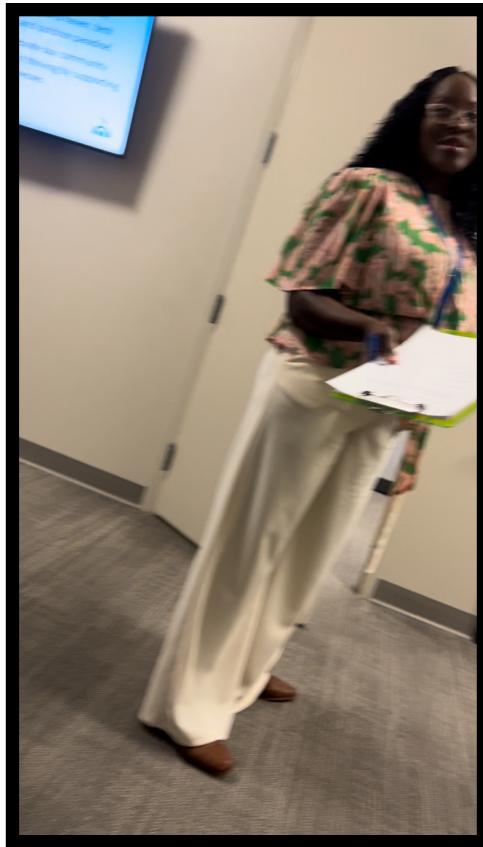
442. Despite multiple pleas to Cowles to address, supervise and correct these criminal efforts toward election interference by City, Dyer, Alban, Herdicia and Nossair, Cowles intentionally neglected his duties and allowed the conspiracy to continue.

443. Specifically, on September 11th, 2023, Nossair and Herdicia sought to disqualify the Plaintiff from the election by adding documents from the property appraiser's office with Frey's name on it in order to disqualify the Plaintiff based on the premise of home ownership, since Frey, Cortes, Goss, Tabbara, Jackson, Edwards, Wallsh, Thompson, Walson, Massicotte, Manganiello, Alban, Fellows, Lowndes, Dymond, Hamner, Carter, Stokes, LeBelle, LFI, Jane, Wilson, Bradley, Acosta, Diamond, Mercado and Beamer had been successful at unlawfully taking the Plaintiff's property and transferring it to Frey.

Nossair and Herdicia falsified the candidate packet to enforce the successful home invasion and theft of property by unlawfully inserting documents showing Frey's purported ownership of the property located at 921 S. Mills Avenue. This was a furtherance of the embezzlement efforts orchestrated by Lowndes, Frey and Dymond, and a malicious effort to ensure that the Plaintiff would not be elected to a position wherein he could eradicate the criminal enterprise from the City of Orlando, and put an end to its system of endangering the public, specifically our elders. This is a testament to how the criminal enterprise at the prestigious law firm was capable of infecting an election that was due to be free and fair.

444. This pattern of Election interference continued when the Plaintiff attempted to run for District 5 Commissioner after Commissioner Hill was suspended from office. Despite legally qualifying for the election, Cheryl Anderson encountered the Plaintiff at City Hall while he was there on other business. While the Plaintiff was sitting in the lobby, Anderson threw the check for the qualifying fee the Plaintiff had provided to Herdicia into the lobby and left it there overnight. Plaintiff was then disqualified from the race for failure to pay the qualifying fee, despite the Florida Election Code prohibiting the return

Special EXHIBIT AAA - TikTok
still



Anderson in City Hall lobby
throwing qualifying check from
Plaintiff in the lobby before
leaving it there overnight.

of qualifying fees to candidates. Video evidence of this encounter can
be found at:

<https://www.tiktok.com/@moedimanche/video/7526592701257485582>

445. Further, once the election issue became a part of the civil rights proceedings (marked by Special Exhibits), it was discovered that the presiding magistrate judge had fraternal ties to Defendant Dyer, mandating his disqualification. He remained on the case despite this conflict of interest and the emails from

Special EXHIBIT - BBB Fabulous Friends photo



Photo demonstrating judge Irick's fraternal ties to Dimanche's political opponent John Dyer

Special EXHIBIT - CCC Melians emails

RE: Document Filing - Orlando Division - 6:22-cv-2073

 **Estrella Melians** 2/6/24 
To: Me ▾

Good morning Mr. Dimanche,
We have reviewed our web portal filings for 1/31/2024, and it appears we did receive your submission; however, it appears the filing was inadvertently moved into the wrong folder, which resulted in the submission being missed for docketing. We do apologize for this error and have placed the submission on the docket with a file date of 1/31/2024. If you are seeking any further relief from the court, please file the appropriate motion. Thank you,

Estrella Melians
Case Administrator- Orlando Division
United States District Court
Middle District of Florida
(407) 835-8587

Show trimmed content ▾

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

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Melians highlights how Dimanche's court filings in the Middle District were systemically "moved to the wrong folder" for the purpose of obstruction, election rigging, and retaliation by Defendant Irick.

Privacy Intrusion

446. In response to the Plaintiff's filing of ***this Civil Rights action***, and pursuit of law enforcement remedies that were eventually rendered ineffective by the Defendants, City, Dyer, Perez, Wallsh, Stokes, Edwards, Worrell and Vargas implemented an unlawful secret surveillance of the Plaintiff.
447. Vargas began **tracking the Plaintiff's vehicle** and monitoring his movements throughout the City of Orlando.
448. Vargas then began sending red light tickets in the mail for a vehicle the Plaintiff was known to operate, and specifically, any time the Plaintiff was on South Street.
449. This was designed to deter the Plaintiff from filing complaints with Internal Affairs as the Orlando Police Department Headquarters are located on South Street.
450. On at least three separate occasions Vargas ticketed the Plaintiff for driving on or near South Street.
451. Vargas was not alerted on these occasions by the system in place to ticket drivers who run red light because Vargas ticketed the vehicle for red lights that are not a part of the program for Orange County or Orlando. Vargas ticketed the vehicle for red lights that are not on any

of the maps alerting the public to red light cameras, and red lights that do not have “Photo Enforced” signage alerting the public to the use of the technology used to ticket motorists.

452. The Plaintiff demanded, in writing, any secret surveillance of the Plaintiff from Wallsh, Stokes, Edwards and Worrell and this secret surveillance was not turned over to him.
453. After the Plaintiff emailed a Notice of Intent to sue the City of Orlando with one, Raymond Scullian, on January 20th, 2023, Perez also began tracking the Plaintiff’s vehicle.
454. Without cause, justification or any explanation, Perez pulled the Plaintiff over while the Plaintiff was driving down South Street headed to Orlando Police Headquarters, and falsely imprisoned the Plaintiff.
455. During the false imprisonment, Perez unlawfully seized the Plaintiff’s identification card, personal information and invaded the Plaintiff’s right to privacy. Perez ordered the Plaintiff to keep his hands on the steering wheel, and the Plaintiff was questioned as to whether or not he had any guns in the car. This racist unlawful detention caused the Plaintiff fear and anxiety as it was under the threat of violence.

Professional misconduct

456. Carter is a licensed psychologist and behavioral therapist. He is trained to identify and assess human beings, and can easily tell when a person is not being truthful.
457. Of all of the people present at 921 S. Mills Avenue on November 10th, 2022, Carter made the most sense of the human behavior displayed by everyone involved. He knew who and who was not being truthful. He knew that Hamner was being untruthful. He knew that Tabbara's behavior was inappropriate.
458. Instead of utilizing his expertise to help law enforcement get to the truth of the situation, he manipulated the situation to his personal benefit by participating in the scheme of Frey and Hamner, while encouraging the behavioral characteristics he observed in Tabbara, Manganiello, and Hamner, to the benefit of Lowndes, Dymond and Frey. Both Carter and Carter Psy owed an ethical duty to the public which was betrayed when Carter's advanced skill set was used to prey on and endanger the public and the Plaintiff.

Failure to Act

459. Through gross negligence, and as an agent of Defendant State of Florida, Worrell is responsible for this entire ordeal.

460. Whether it was a severe lack of oversight that allowed Wallsh to use the Office of the State Attorney as an exclusive club to protect his friends, or an extreme failure to supervise the operations of that office that resulted in Edwards advancing selective prosecution as the Black face of them without any legal authority to do so, Worrell has established herself as a very dangerous person to the public and must be declared unfit to ever hold an office of public trust again.

461. Through gross negligence, Russell is responsible for this entire ordeal.

462. Whether it was a severe lack of oversight that allowed Geist, LeBelle, Singh, Rochelle, and Hanny to use the Orange County Clerk of Court's office as a weapon to advance the embezzlement efforts of Lowndes, Dymond and Frey, or an extreme failure to supervise the operations of that office that resulted in warrants and bonds that won't go away, fraudulent issuances of capias' and bond forfeitures, and the obstruction of the appellate process, Russell has established herself as a very dangerous person to the public and must be declared unfit to ever hold an office of public trust again.

The Opal Drive Foreclosure Scheme and Surplus Forgery

463. Upon information and belief, the Defendants' conspiracy escalated in late April 2023 when Plaintiff came into legal possession of the real property located at 2130 Opal Drive, Orlando, Florida 32818 (the "Opal Property"). What began as an adverse possession claim actually became an inheritance with Plaintiff designated as heir and devisee under the Last Will and Testament of Gregory L. Huelsberg, deceased. This inheritance was triggered by the prior death of Robert Halkum, whose passing activated the testamentary provision bequeathing the property to Plaintiff. At all relevant times, Plaintiff, as a result, did not need to continue pursuing an adverse possession claim.

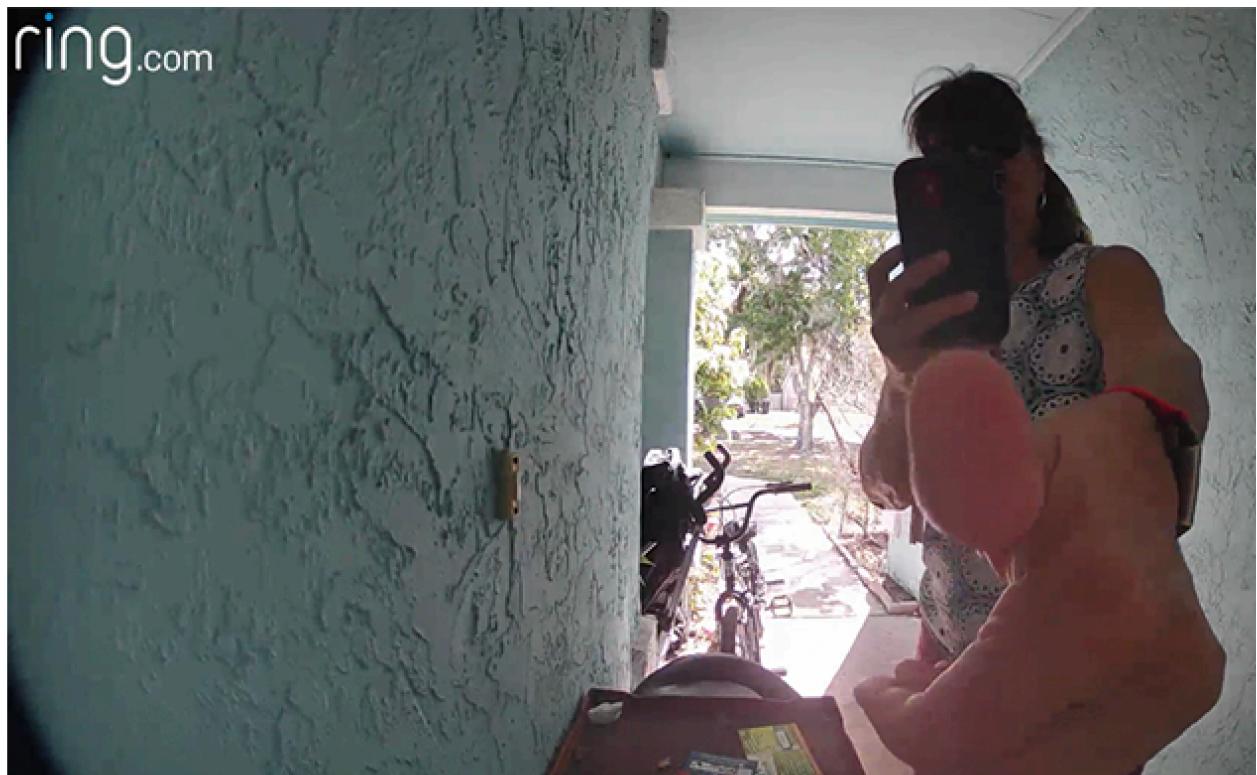
464. Shortly after Plaintiff's possession, Defendant Reverse Mortgage Funding LLC ("RMF"), holder of a predatory reverse mortgage, initiated a fraudulent foreclosure action styled Reverse Mortgage Funding LLC v. Unknown Spouse, Heirs, Devisees, Grantees, Assignees, Lienors, Creditors, Trustees, and All Other Parties Claiming an Interest by, Through, Under or Against the Estate of Gregory L. Huelsberg, Deceased, et al., Case No. 2022-CA-010314-O, in the Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida (the "Opal Action"). Plaintiff was designated therein as "Unknown Tenant #1/Heir/Devisee".

465. The RING footage of the fraudulent service can be found at:

<https://drive.google.com/file/d/>

[1wktuoIWaMJpIC8gQ32bDUSm9CoxsPqMG/view?usp=share_link](https://drive.google.com/file/d/1wktuoIWaMJpIC8gQ32bDUSm9CoxsPqMG/view?usp=share_link)

EXHIBIT X



"Diana" pretending to ring the doorbell and taking a picture of her hand.

466. Defendants RMF and its agent "Diana from RMF" perpetrated service fraud to evade notice and jurisdiction. As captured on the property's RING doorbell camera, Diana approached the residence, pretended to ring the doorbell, photographed her own hand as false "proof" of attempt, and departed without leaving summons or complaint. This

sham constituted a willful violation of § 48.031, rendering the Opal Action void ab initio for lack of personal jurisdiction and due process under the Fourteenth Amendment to the United States Constitution and Article I, Section 9 of the Florida Constitution.

467. To further conceal the jurisdictional defect, Defendants resorted to defective constructive service via publication in the Heritage Florida Jewish News. An affidavit sworn by David Lehman, office manager, falsely claimed weekly publication of the summons in Orlando issues for one year. However, a comprehensive search of the newspaper's archives from November 2021 to October 2024 yields zero records of the Opal Action's initiation or summons. The affidavit relied on a single photographic "proof" of print, in violation of Florida Statutes § 49.011. This fraud on the court, akin to the photoshopped speedy trial notices, deprived Plaintiff of notice and opportunity to defend, constituting extrinsic fraud.
468. In mid-2023, Defendant Judge Jeff Ashton, presiding over the Opal Action, engaged in judicial misconduct by proactively directing RMF's counsel, Karissa Chin-Duncan, to file a motion for default judgment. This is an impermissible ex parte intervention under Florida Rule of Civil Procedure 1.500(a), which reserves default motions to the plaintiff after 20 days' non-response. Ashton's directive, without

motion or hearing, tainted the proceedings with bias and overreach, breaching due process and Florida Code of Judicial Conduct Canon 3B(7). Chin-Duncan, complicit in the scheme, promptly filed the motion, securing a clerk's default despite the service defects.

EXHIBIT Y

HERITAGE FLORIDA JEWISH NEWS

Published Weekly
ORLANDO, ORANGE COUNTY, FLORIDA

**STATE OF FLORIDA
COUNTY OF ORANGE**

Before the undersigned authority personally appeared David Lchman, who on oath says he is the office manager of the *HERITAGE Florida Jewish News*, a weekly newspaper published at Orlando in Orange County, Florida, that the attached copy of advertisement, being a

NOTICE OF ACTION - CASE No. 2022-CA-010314-O

in the matter of
REVERSE MORTGAGE FUNDING LLC,
Plaintiff,
vs.
UNKNOWN SPOUSE, HEIRS, DEVISEES, GRANTEES, ASSIGNEES, LIENORS,
CREDITORS, TRUSTEES AND ALL OTHER PARTIES CLAIMING AN
INTEREST BY, THROUGH, UNDER OR AGAINST THE ESTATE OF GREGORY
L. HUELSBERG, DECEASED, et al.,
Defendants

in the Circuit Court, was published in said newspaper in the issues of
February 3, 2023

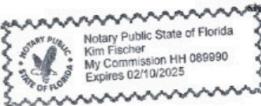
Affiant further says that the said *HERITAGE Florida Jewish Newspaper* is a newspaper published at Orlando, in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Florida, each week and has been entered as periodical matter at the post office in Orlando in said Orange County, Florida, for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.


Signature of Affiant

Sworn to and subscribed before me this 10th day of February 2023.


Signature of Notary

Personally known X or produced identification
Type of identification produced
Name of Notary typed printed or stamped


Notary Public State of Florida
Kim Fischer
My Commission HH 086990
Expires 02/10/2025

IN THE CIRCUIT COURT OF THE 8TH JUDICIAL CIRCUIT, IN AND FOR ORANGE COUNTY, FLORIDA
CASE NO. 2022-CA-010314-O
REVERSE MORTGAGE FUNDING LLC,
Plaintiff,
vs.
UNKNOWN SPOUSE, HEIRS,
DEVISEES, GRANTEES,
ASSIGNEES, LIENORS,
CREDITORS, TRUSTEES
AND ALL OTHER PARTIES
CLAIMING AN
INTEREST BY, THROUGH,
UNDER OR AGAINST THE
ESTATE OF GREGORY
L. HUELSBERG, DECEASED,
et al.,
Defendants
NOTICE OF ACTION
TO UNKNOWN SPOUSE,
HEIRS, DEVISEES,
GRANTEES, ASSIGNEES,
LIENORS, CREDITORS,
TRUSTEES AND ALL OTHER
PARTIES CLAIMING AN
INTEREST BY, THROUGH,
UNDER OR AGAINST THE
ESTATE OF GREGORY
L. HUELSBERG, DECEASED,
et al.,
REVERSE MORTGAGE FUNDING LLC,
ORLANDO, FL 32822
UNKNOWN TENANT #1 and
UNKNOWN TENANT #2
2130 N. DIAZ MUELA,
ORLANDO, FL 32822
YOU ARE HEREBY NOTIFIED
that the above Plaintiff, a
mortgagee on the following
described property located in
Orange County, Florida,
LOT 6 RID PINAR LAKES
UNIT III B, ACCORDING
TO THE PLAT THEREOF
AS SHOWN ON PLAT
BOOK 17, PAGE 53, OF
THE PUBLIC RECORDS
OF ORANGE COUNTY,
FLORIDA
has been filed against you,
and you are required to
serve a copy of the same
defenses, if any, to this action,
on Greenspond, Monitor, LLP
and Orange County Attorney
for Plaintiff, whose address is
Trade Centre South, Suite 700,
100 South Cypress Street, Orlando,
FL 32801, within 30 days of the date
hereof, and file the original and
file the original with the Clerk
within 30 days after the first
date of service of this notice
in the *HERITAGE FLORIDA JEWISH
NEWS*, on or before September
10, 2023, otherwise a default
and a judgment may be entered
against you for the relief
demanded in the Complaint.
In accordance with the
Americans with Disabilities Act,
any person who requires an
accommodation to participate
in this proceeding should, no
later than 10 days prior
to the Clerk of Court's
disability coordinator at 425 N
ORANGE AVENUE, ORLANDO,
FL 32801, or 407-246-3000, if
hearing or voice impaired,
contact (TDD) 800/995-8771
via telephone.
**WITNESS MY HAND AND
SEAL OF SAID COURT on this**
31st day of January, 2023
By: Sandra Jackson
(CIRCUIT COURT SEAL)
Deputy Clerk
February 3, 2023 L 199128

Defective public notice

469. Upon discovering the Opal Action through public records, Dimanche, proceeding as "Unknown Tenant #1/Heir/Devisee," filed a Verified Objection to Foreclosure Sale and Motion to Vacate Judgment. The Verified Objection invoked Rule 1.540(b)(3) for fraud on the court, § 48.011 for defective service, and Florida Deceptive and Unfair Trade Practices Act § 501.201, for RMF's predatory and unauthorized lending practices. It included sworn testimony detailing Diana's RING footage fraud, RMF's lack of standing as assignee, and the sham publication.

470. In late 2023, Defendant Kathryn Smith, counsel for auctioneer Pondview Properties and of Kathryn Smith Law Firm, opposed the Verified Objection, falsely arguing it was "unsworn" despite its verification under penalty of perjury. Smith sought to expedite the sale under Pondview's control. Defendant Judge Luis Calderon (previously complicit in the Mills Avenue warrant issuance), presiding, denied the motion on the pretext of an "oath defect," ignoring the verification and jurisdictional voids. Calderon's ruling misapplied Rule 1.540 and enabled the fraudulent progression, in violation of due process and constituting abuse of process.

471. In 2024, Calderon accelerated the foreclosure sale and auction for Pondview Properties, issuing a certificate of title to the buyer despite

the nullity. The Orange County Sheriff's Office then executed a writ of possession, unlawfully evicting Plaintiff from the Opal Property without valid jurisdiction or exigency. This seizure violated the Fourth Amendment and Florida Statutes § 83.62(2), damages for wrongful eviction, with OCSO liable under Monell for customs of blind enforcement on defective judgments.

472. Post-sale, Plaintiff asserted his heir entitlement to surplus funds, via timely petition in the event that Calderon would not return the premises. Calderon stonewalled disbursement and property return for nearly one year (2024-2025), ignoring the statutory 60-day mandate for hearings (§ 45.032(6)) and perpetuating the deprivation.
473. In early 2025, to coerce abandonment of the surplus claim, Calderon recruited proxy Christopher Grey, a California resident, to contact Plaintiff. Grey intimidated Dimanche about the pending Bar complaint against Judah Mandel (detailed below), and disclosure of surplus details, in violation of Florida Code of Judicial Conduct Canon 3A(4) and 18 U.S.C. § 242 (intimidation under color of law). This coercion chilled Plaintiff's access to courts and remedies.
474. On or about March 12, 2025, Defendants Judah Mandel of Mandel Law PLLC, Larry Evans, and Jen-Hsun Huang, President/COO of assignee IDEA Capital Group Inc. d/b/a ICG Inc., also known as

EXHIBIT Z

Subject DocuSign password reset attempt
From DocuSign via DocuSign <dse@docsign.net>
To: MOLIERE DAIMANCHE
<moliereexpressions@yahoo.com>
Date Today at 2:44 PM



You do not have a DocuSign account

We received a request to reset the DocuSign password for this email, but no account exists.

If you are trying to access a document, please use the link you received in email.

If you would like to sign up, for a free trial account, click link below.

If you did not initiate this request, you may disregard this email. Any documents you may have previously signed are secure.

[Sign Up](#)

About DocuSign

Sign documents electronically in just minutes. It's safe, secure, and legally binding. Whether you're in an office, at home, on-the-go -- or even across the globe -- DocuSign provides a professional trusted solution for Digital Transaction

Response from DocuSign that Plaintiff does not have a DocuSign account

Nvidia CEO, orchestrated a forged "Agreement and Assignment of Surplus Rights." The document, executed via DocuSign, falsely purported Plaintiff's signature as Personal Representative of the Huelsberg estate, irrevocably transferring all surplus rights to IDEA

EXHIBIT Z(a)

AFFIDAVIT OF JEN-HSUN HUANG, REPRESENTATIVE OF IDEA CAPITAL GROUP INC.

STATE OF FLORIDA
COUNTY OF Miami-Dade

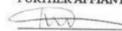
BEFORE ME, the undersigned authority, personally appeared **Jen-Hsun Huang**, who, being duly sworn, deposes and states as follows:

1. **Affiant's Identity:** My name is **Jen-Hsun Huang**, and I am the Chief of Operations of IDEA Capital Group Inc. d/b/a ICG Inc., a Florida corporation with a principal office located at 1110 Brickell Avenue, Suite 430, Miami, FL 33131.
2. **Assignment Agreement:** On or about March 12, 2025, IDEA Capital Group Inc. received a fully executed Agreement and Assignment of Surplus Rights (the "Agreement") from **Molierre Dimanche**, who identified himself as the Personal Representative of the Estate of **Gregory L. Huelsberg**. This Agreement transferred all rights to surplus funds resulting from the foreclosure of property located at 5220 Curry Ford Rd, Unit 303, Orlando, FL 32812 (Parcel ID No. 02-23-30-7474-00-630) to IDEA Capital Group Inc.
3. **Execution and Signature:** The Agreement was executed by Mr. Dimanche through the DocuSign platform using the email address molierreexpressions@yahoo.com. The document was signed electronically on March 12, 2025, and a DocuSign Certificate of Completion was generated, confirming Mr. Dimanche's identity, IP address, and timestamp.
4. **Initiation of Contact:** Prior to execution, IDEA Capital Group's private investigator made contact at the subject property, where a tenant identified as Robert Halkum provided Mr. Dimanche's contact information after placing him on speakerphone with the investigator. Mr. Dimanche then voluntarily communicated with IDEA Capital Group Inc. and signed the Agreement electronically.
5. **Retention of Counsel:** Pursuant to the Assignment, IDEA Capital Group retained attorney **Judah Mandel, Esq.**, of Law Mandel PLLC, solely to represent IDEA Capital Group Inc. as the assignee in the surplus recovery proceeding in *Reverse Mortgage Funding LLC v. Estate of Gregory L. Huelsberg*, Case No. 2022-CA-010314-0, pending in the Circuit Court of Orange County, Florida.
6. **Affiant's Execution:** I, Jen-Hsun Huang, signed the Assignment Agreement on behalf of IDEA Capital Group Inc. on March 12, 2025, via DocuSign, and to the best of my knowledge, the document was fully executed and legally valid.

1

7. **Denial of Fraudulent Conduct:** At no point did IDEA Capital Group Inc. or I engage in forgery, fraud, or misrepresentation. All actions were taken in good faith based on the documentation and communications received directly from Mr. Dimanche.
8. **Subsequent Dispute and Withdrawal:** After filing the motion for disbursement, Mr. Dimanche made representations to the court denying the Assignment. In response, our retained counsel immediately filed a Notice of Withdrawal and withdrew the motion the same day, March 18, 2025.
9. **Assessment of Standing:** Based on subsequent investigation and legal review, it appears that Mr. Dimanche may not have been duly appointed by the probate court as Personal Representative of the Estate of **Gregory L. Huelsberg**, and therefore may not have had authority to execute the Assignment Agreement.
10. **Good Faith and Cooperation:** IDEA Capital Group Inc. acted at all times in good faith, reasonably relying on the representations, documentation, and electronic execution by Mr. Dimanche. Upon learning of the dispute, IDEA Capital Group Inc. ceased all action related to the surplus claim pending further clarification.

FURTHER AFFIANT SAYETH NAUGHT.



Jen-Hsun Huang
Chief of Operations
IDEA Capital Group Inc.

Sworn to and subscribed before me by means of physical presence or online notarization, this 30 day of April, 2025, by **Jen-Hsun Huang**, who is personally known to me or who has produced Florida as identification.



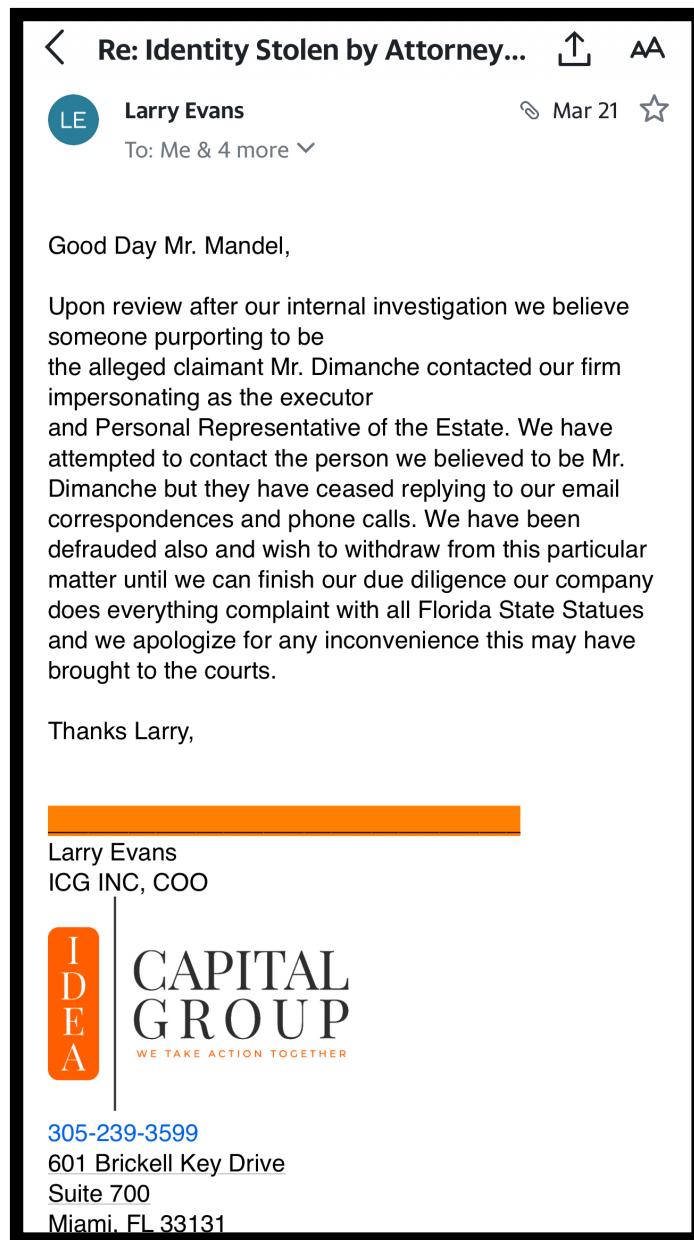
Notary Public
State of Florida
My Commission Expires: _____



Affidavit of Jen-Hsung Huang provided to the Bar by Mandel on May 1, 2025 falsely attesting to an agreement with Dimanche that was facilitated by a person who had been deceased for years, and at a residence that had been seized from Dimanche by the enterprise.

for disbursement to Mandel's trust account. The signature was fabricated, with metadata spoofed to Washington state via GTHost proxy, inconsistent with Dimanche's Florida/Yahoo origins.

EXHIBIT Z(b)



The image is a screenshot of an email interface. The subject line is "Re: Identity Stolen by Attorney...". The sender is "Larry Evans" (LE) and the recipient is "To: Me & 4 more". The date is "Mar 21". The email body starts with "Good Day Mr. Mandel," followed by a detailed message about an internal investigation into a claimant impersonating the executor and personal representative of an estate. The message states that attempts to contact the claimant have been unsuccessful and that the company is following Florida State Statutes. The email concludes with "Thanks Larry," and a signature block for Larry Evans, ICG INC, COO, with the Capital Group logo and contact information for 305-239-3599, 601 Brickell Key Drive, Suite 700, Miami, FL 33131.

Re: Identity Stolen by Attorney...

Larry Evans

To: Me & 4 more

Mar 21

Good Day Mr. Mandel,

Upon review after our internal investigation we believe someone purporting to be the alleged claimant Mr. Dimanche contacted our firm impersonating as the executor and Personal Representative of the Estate. We have attempted to contact the person we believed to be Mr. Dimanche but they have ceased replying to our email correspondences and phone calls. We have been defrauded also and wish to withdraw from this particular matter until we can finish our due diligence our company does everything complaint with all Florida State Statues and we apologize for any inconvenience this may have brought to the courts.

Thanks Larry,

Larry Evans
ICG INC, COO

CAPITAL GROUP
WE TAKE ACTION TOGETHER

305-239-3599
601 Brickell Key Drive
Suite 700
Miami, FL 33131

Email from Larry Evans to Bar Counsel and the DOGE House Oversight Committee asserting that they had withdrawn from the fraudulent deal after Dimanche exposed the fraud.

475. The forgery incorporated a fabricated "consent" narrative: Evans' investigator allegedly "contacted" Plaintiff via speakerphone with deceased Halkum which is impossible, as Halkum died years prior to the suit, and only Pondview agents accessed the property at that time because the writ of possession had already been executed. This perjured detail masked the scheme to siphon the surplus.
476. On March 18, 2025, Mandel filed the Notice of Assignment and Motion for Disbursement of Surplus Funds (Filing #219069203), directing the clerk to pay the funds to Law Mandel PLLC's trust for IDEA/Huang's benefit. The motion referenced the forged agreement and misstated the parcel as 5220 Curry Ford Rd. Unit 303.
477. On the same day, March 18, 2025, Plaintiff filed a Verified Response to the Fraudulent Notice of Assignment and Motion for Disbursement of Surplus Funds, sworn under penalty of perjury, denying all knowledge of Mandel, Huang, Evans, or IDEA; asserting the signature forgery; and demanding immediate vacatur under Rule 1.540(b)(3) and § 817.535. The Response highlighted the metadata anomaly and Halkum impossibility.
478. Prompted by the Response, Mandel voluntarily withdrew the motion on March 18, 2025. However, to shield the fraud, Mandel filed a Bar complaint response on May 1, 2025 (Florida Bar File No.

2025-70,459), claiming "good faith" reliance on the forged DocuSign agreement and completion certificate. Huang's attached affidavit perjured the execution facts, ignoring the spoof. The defense weaponized the Bar process as retaliation, misrepresenting Halkum's "contact" and metadata authenticity.

479. Plaintiff filed a Second Rebuttal to the Bar Counsel Christopher Stephen Wackes on May 1, 2025, exposing the IP spoof and Halkum fabrication. Despite preponderance-of-evidence standard, Wackes dismissed the complaint under an erroneous "beyond a reasonable doubt" criminal threshold, making himself complicit in the cover-up.
480. As of November 19, 2025, the surplus remains undisbursed by the clerk, and the Opal Property has not been returned, despite the Bar probe confirming Mandel's fraud. Calderon's stonewalling, Grey's coercion, and the Bar shield consummated deprivation. This pattern of falsification and coercion nullifies Plaintiff's dignity, demanding immediate judicial intervention.

Sham Foreclosure Proceedings to Deprive Liberty

481. The Defendants' multi-year conspiracy to dehumanize Plaintiff and nullify his constitutional and statutory rights culminated in 2024 with the targeted assault on Plaintiff's third homestead, the real property

located at 13128 Jupiter Hills Court, Orlando, Florida 32828 (the "Jupiter Property"; Orange County Parcel Identification No. 35-22-31-2005-00-220, situated within the Deer Run South PUD Phase 1 Parcel 11, as platted in Plat Book 24, pages 6-9 of the Public Records of Orange County, Florida). Plaintiff acquired legal possession of the Jupiter Property through adverse possession under Florida Statutes Chapter 95, fully satisfying the statutory prerequisites: (i) color of title via a recorded deed (Orange County Document No. 20240725855, entered in the Public Records, establishing chain of title within the limits of Chapter 95.

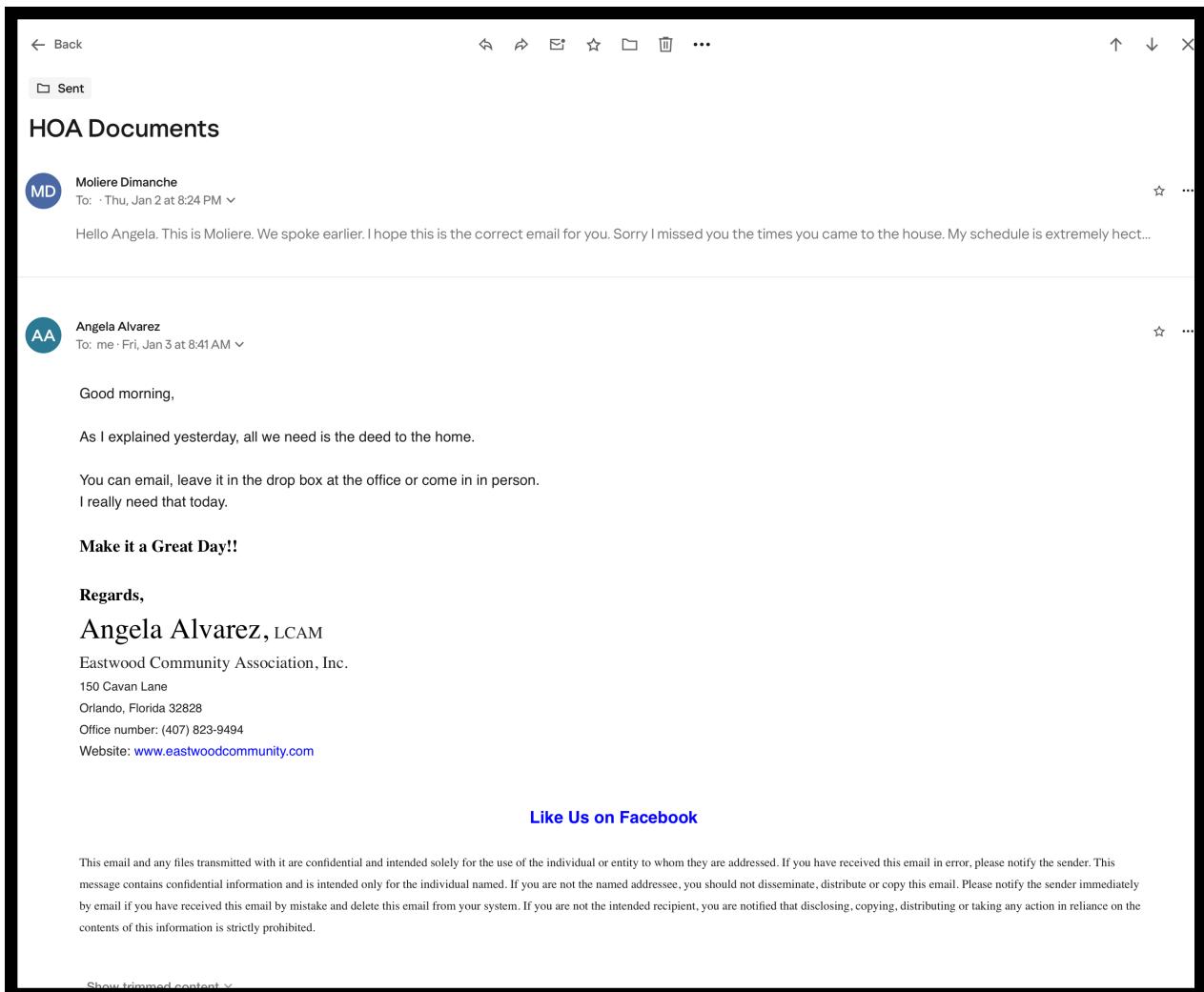
482. The Jupiter Property's abandonment, stemming from Bruno's death without heirs or successors, presented a textbook adverse possession opportunity. However, Defendants, leveraging the lingering stigma of Plaintiff's void 2008 conviction and the conviction secured by the extortion by Calderon and Edwards, identified this vulnerability as a prime target for the conspiracy's next evolution: a coordinated HOA lien foreclosure scam intertwined with predatory mortgage servicing. This phase echoed the procedural shams of the Mills Avenue episode under conflicted judges Opal Drive's defective service by Diana from RMF and surplus forgery by Mandel/Huang, but escalated by piercing constitutional homestead protections through state actors.

483. In 2024, shortly after Plaintiff established residency and complied with all municipal codes, Defendant Angela Alvarez, principal and managing agent of Defendant Extreme Management Team, the contracted property management entity for Defendant Eastwood Community Association Inc., arrived unannounced at the Jupiter Property under the pretense of a routine compliance inspection. Alvarez, acting in concert with Eastwood HOA's board and Extreme's policies of aggressive enforcement against perceived "squatters" or adverse possessors, demanded immediate production of the deed (Document No. 20240725855) and proof of ownership. When Plaintiff initially demurred, citing privacy, Alvarez escalated with extortionate threats: She enumerated fabricated violations under Eastwood HOA's covenants, conditions, and restrictions, including untrimmed bushes exceeding 18 inches in height, failure to pressure wash the exterior siding within the past 12 months, absence of fresh mulch in landscaped beds, and non-conforming grass color. Alvarez warned that non-compliance would trigger "immediate liens and fines" plus acceleration of all alleged past-due assessments, potentially totaling tens of thousands of dollars, despite Plaintiff's recent remediation efforts and the property's abandoned state pre-possession.

484. Alvarez's demands were not benign enforcement but a calculated pretext to obtain the deed for ulterior purposes, in violation of Florida Statutes § 720.305. Plaintiff, relying in good faith on Alvarez's representation that the deed was solely required for "onboarding" into the Eastwood HOA, i.e., formal recognition as member to enable payment of any legitimate future assessments and access to community amenities, provided the document. Alvarez's email purported to only seek the deed for the purpose of onboarding. This inducement constituted deceptive trade practices under Florida Deceptive and Unfair Trade Practices Act § 501.201 et seq., as it masked the true intent: weaponizing the deed to fabricate a retroactive claim against the deceased Bruno.

485. Upon receipt of the deed, Alvarez did not proceed with onboarding as promised. Instead, in direct collusion with Defendant Karen J. Wonsetler of Defendant Wonsetler & Webner P.A., Alvarez forwarded the deed to Wonsetler. Wonsetler, purporting to represent Eastwood HOA, though upon information and belief, Eastwood's board was unaware of or uninvolving in the scheme, rendering Wonsetler's "representation" a fraudulent "ghost" agency, immediately orchestrated the recording of a fraudulent Claim of Lien on January 9, 2025 (Orange County Document No. 20250017944).

EXHIBIT Z(a)



MD Moliere Dimanche
To: · Thu, Jan 2 at 8:24 PM ·
Hello Angela. This is Moliere. We spoke earlier. I hope this is the correct email for you. Sorry I missed you the times you came to the house. My schedule is extremely hect...

AA Angela Alvarez
To: me · Fri, Jan 3 at 8:41 AM ·
Good morning,
As I explained yesterday, all we need is the deed to the home.
You can email, leave it in the drop box at the office or come in in person.
I really need that today.
Make it a Great Day!!
Regards,
Angela Alvarez, LCAM
Eastwood Community Association, Inc.
150 Cavan Lane
Orlando, Florida 32828
Office number: (407) 823-9494
Website: www.eastwoodcommunity.com

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January 2, 2025 correspondence from Alvarez seeking deed.

486. The Wonsetler Lien was patently invalid and maliciously contrived under Florida Statutes § 720.3085: (i) it retroactively assessed maintenance dues against Diane E. Bruno for periods for which she was not alive. It incorporated attorney's fees in the amount of \$2,500, expressly prohibited by § 720.3085(3)(a) absent a filed lawsuit or arbitration at the time of lien creation and no such litigation existed. It

ignored Plaintiff's adverse possession rights under Chapter 95, attempting to "bootstrap" a quick foreclosure to extinguish title without due process. The lien amount was inflated with fictitious late fees and interest, designed to overwhelm a pro se claimant like Plaintiff. This tactic mirrored Wonsetler's prior fraud on Mr. Huston in the Robert's Rise HOA matter wherein Wonsetler did the same thing to an elderly man in his 90's, ensured that he was unaware of the court proceedings against him by withholding mail addressed to him, and with liens for HOA assessments from an unlicensed CAM. In that case, Wonsetler converted fabricated debts into dues for liens, and extorted post-foreclosure positions, confirming a pattern of predatory HOA "enforcement" as RICO predicates (§ 1962(c)).

487. To render the invalid lien enforceable and circumvent homestead protections, Defendant Lorie Lucas, an employee of Defendant Amy Mercado, Orange County Property Appraiser, maliciously revoked Plaintiff's homestead exemption in January 2025, immediately following the lien recording. Despite Plaintiff's full compliance, Lucas revoked the homestead protections. This revocation was not routine but coordinated with Eastwood, Extreme, and Wonsetler. The Property Appraiser's Office is liable under Monell for customs enabling HOA overreach.

488. Compounding the scheme, on March 26, 2025, Plaintiff attempted to record a sworn Notice of Contest of Lien in the Public Records of Orange County, Florida, pursuant to § 720.3085(4)(b). The Notice formally notified Wonsetler and Eastwood HOA of the contest, limiting their enforcement window to 60 days from service and demanding lien discharge for fraud. However, Defendants Ryan Smith, Orange County Comptroller, and OCCO Jane Does 1-4 willfully obstructed the recording process, and told Plaintiff he was not welcome in the Orange County Comptroller's office. This interference denied Plaintiff timely preservation of his adverse possession claim and access to remedies, violating the First Amendment and Fourteenth Amendment due process, and constituting obstruction of justice.

489. In direct response to the mounting evidence of fraud, Plaintiff initiated a Verified Petition for Declaratory Judgment and Request for Summary Procedure on or about April 1, 2025, in the County Court of the Ninth Judicial Circuit in and for Orange County, Florida (Case No. 2025-CC-006283-O. The Petition sought: (i) declaration of the Wonsetler Lien's absolute invalidity and immediate discharge from the public records (ii) reinstatement of the homestead exemption, (iii) and

a declaration that Plaintiff should be able to pay the HOA assessment dues.

490. Defendants mounted a multi-front defense to suppress the Petition and perpetuate the fraud. In early May 2025, Wonsetler and Wonsetler Firm filed a Motion to Dismiss, leading with *ad hominem* attacks on Plaintiff as "protesting too much" for asserting his Seventh Amendment jury right, itself a First Amendment retaliation violation by chilling pro se advocacy. The MTD invoked qualified immunity and litigation privilege (§ 90.502), ignoring the lien's pre-litigative nature. Plaintiff responded in opposition, dismantling the arguments: No immunity for extrinsic fraud; privilege inapplicable to non-judicial acts; and MTD's bad faith warranted sanctions under § 57.105.
491. Concurrently, Defendants Amy Mercado and the Orange County Property Appraiser's Office filed a Motion for Protective Order to quash Plaintiff's discovery requests for Lucas' revocation files, internal emails with Extreme/Alvarez, and exemption approval logs, claiming the demands posed "annoyance, embarrassment, oppression, or undue burden or expense" under Florida Rule of Civil Procedure 1.280(c). This was pretextual concealment, as the files directly evidenced the coordinated revocation to aid the lien. Plaintiff objected and the Objection sought full production.

492. In case No. 2025-CC-006283-O, the proceedings were systematically rigged in favor of Respondents through a series of biased rulings commencing in June 2025. The enterprise first granted Wonsetler's Motion to Dismiss, erroneously extending absolute litigation privilege under § 90.502 to shield the pre-suit lien filing and fee inclusion, misapplying the doctrine, which protects only statements or acts made in the course of judicial proceedings.

493. This ruling ignored the Petition's verified facts and FDUTPA issues, constituting fraud on the court under Rule 1.540(b)(3) and abuse of discretion. Wonsetler was dismissed as a defendant with prejudice, denying summary procedure and jury trial despite demand, in violation of the Seventh Amendment and Florida Rule 1.430(a).

494. Upon information and belief, the enterprise's rulings were influenced by the broader network of local attorneys.

495. The enterprise also legislated from the bench by telling the Plaintiff that he was required to possess the premises for 7 years prior to filing a Return of Real Property form with the State of Florida, when the Florida Statutes establish the opposite: the Return must be filed first because it is the commencement of the adverse possession claim. This was an effort to nullify the Return of Real Property.

496. Despite the rigged dismissal, Plaintiff's diligent filings dismayed Wonsetler from advancing the scam foreclosure within the 60-day enforcement window (§ 720.3085(4)(b)), stalling immediate loss of the Jupiter Property as of November 19, 2025. The lien remains a cloud on title. Defendants' scheme has inflicted irreparable harm, emotional distress from repeated eviction threats, and chilled exercise of adverse possession rights.

497. The Jupiter fraud is not isolated but part of Wonsetler's documented modus operandi. It stems from, Wonsetler, through proxy Robert T. Lam's 30 Day Nola LLC, converting a baseless \$5,766.90 "debt" into enforceable "maintenance dues" via fabricated letter, bootstrapping a lien without valid assessments or notice, directly paralleling the retro dues on Bruno. She then padded a post-lien invoice for Huston's residence with manufactured violations, a blatant contradiction to the scheme's fee component, shielding it from scrutiny under § 720.3085(3). Finally, after Huston's home was foreclosed in 2024, Wonsetler filed a post-judgment affidavit claiming an additional \$3,200 in "attorney's fees for enforcement", stripping residual equity and mirroring the frozen Opal surplus, a common occurrence in the Ninth Judicial Circuit. These acts confirm Wonsetler/Extreme/

Eastwood as a RICO enterprise, with predicates including wire fraud and false statements.

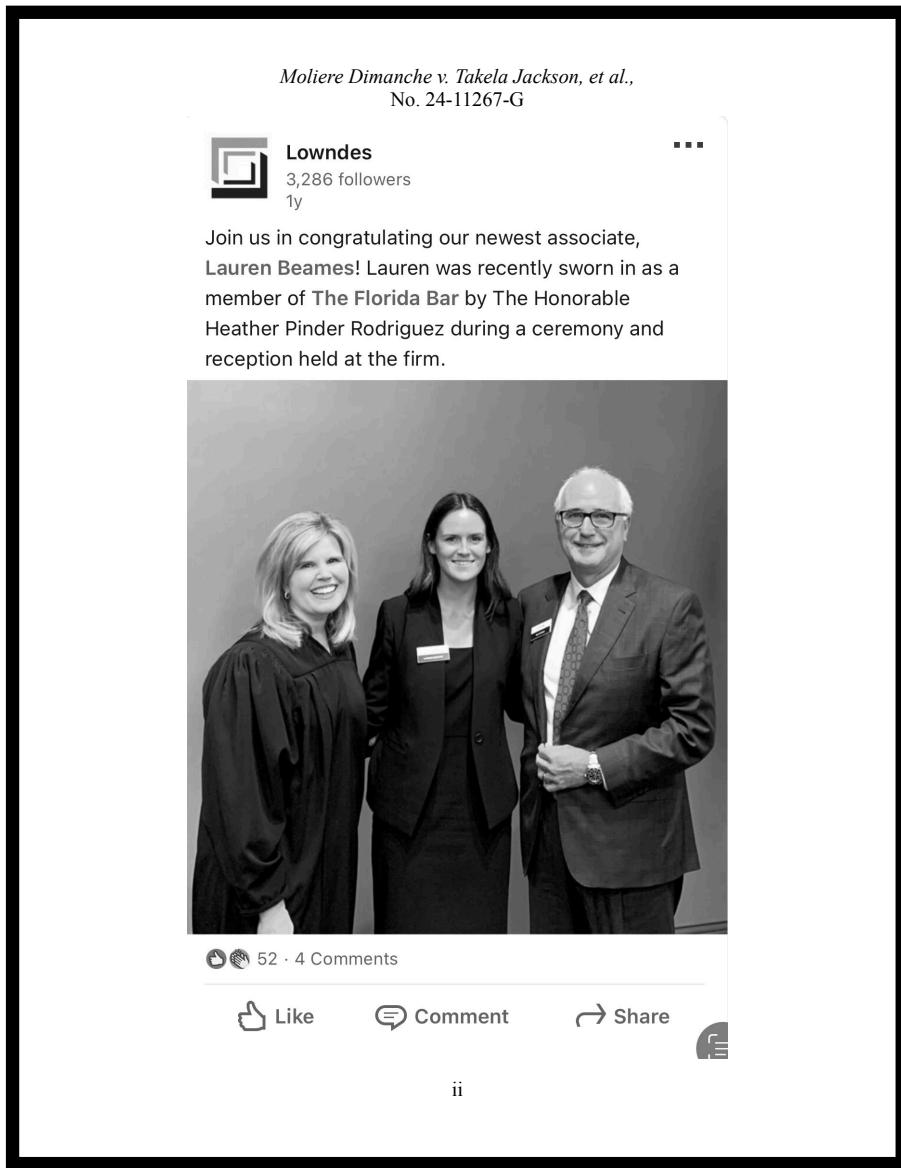
Malicious Misuse of the Vexatious Litigant Order as Retaliatory Weaponry to Suppress Defense Rights

498. Integral to the Jupiter Hills assault and the overarching conspiracy's design to silence Plaintiff's defenses, Defendants Kathryn Smith and Heather Pinder-Rodriguez repeatedly weaponized an invalid "vexatious litigant" designation against Plaintiff, not to curb meritless filings as a plaintiff, but to quash his legitimate *defensive* responses in actions initiated against him by their allies. This misuse perverted Florida Statutes § 68.093, which explicitly targets habitual plaintiffs abusing the system through five or more meritless actions in a five-year period. Section 68.093 does not authorize preemptive labels against defendants exercising basic rights to contest baseless claims, nor does it permit its invocation as a shield in initiated suits—yet Smith and Pinder-Rodriguez deployed it as such, in flagrant violation of the First Amendment, Fourteenth Amendment due process, and Florida's prohibition on retaliatory process abuse (Fla. Stat. § 95.11(4)

(a) and Florida Code of Judicial Conduct Canon 3B(4), requiring impartiality).

499. Pinder-Rodriguez issued the order without jurisdiction to do so, and after colluding with James Walson. On August 6th, 2025, Plaintiff and

EXHIBIT AA



ii

Social media post of Pinder-Rodriguez at the Lowndes law firm with its president and swearing in a staff member.

James Walson had a phone conversation. It was an attempt to settle the dispute, but instead Walson threatened the safety of the Plaintiff's children if the Plaintiff would not agree to abandoning this specific

EXHIBIT BB

Moliere Dimanche v. Takela Jackson, et al.,
No. 24-11267-G



iv

Pinder-Rodriguez's husband at the Lowndes law firm with its new president, demonstrating a family-law-firm relationship that disqualified her from presiding over cases between the Plaintiff and Lowndes staff.

legal action. That same day, Walson and attorney Michael Piccolo colluded with Pinder-Rodriguez to have Plaintiff declared a vexatious litigant for the purpose of concealing the continued racketeering activity of the enterprise and obstructing opposition to the scams to take the Jupiter Hills residence away from Dimanche.

500. This comes after Plaintiff filed a writ of prohibition against Pinder-Rodriguez after she gave Walson legal advice from the bench on how to prevail over the Plaintiff in a civil action, to which she conceded after ruling on a motion to disqualify her due to her personal ties to the Lowndes law firm.
501. Despite being divested of jurisdiction due to her conflicts, Pinder-Rodriguez inserted herself into litigation that had been ruled on by other judges and injected her own findings of frivolousness, when those judges made no such findings, and when the findings were not warranted.
502. She injected her personal findings into the following actions in order to give Walson, Smith, and Wonsetler the tools that they would need to violate the Plaintiff's Constitutional right to access the courts:
 1. Dimanche v. Jackson, 6:22-cv-2073-CEM-DCI
 2. Moliere Dimanche v. Julie Lauren Frey, Case No. 2023-CA-013381-0

EXHIBIT CC

Moliere Dimanche v. Takela Jackson, et al.,
No. 24-11267-G

Filing # 180891582 E-Filed 08/31/2023 11:41:28 AM

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA**

MOLIERE DIMANCHE

Plaintiff(s),
vs.
JULIA LAUREN FREY

**CASE NO.: 2023-CA-013381-O
DIVISION NO.: 34**

Defendant(s).

ORDER ON PLAINTIFF'S MOTION TO DISQUALIFY
JUDGE HEATHER PINDER RODRIGUEZ

THIS CAUSE, came before the court in chambers for review on Plaintiff's Motion to Disqualify Judge Heather Pinder Rodriguez filed on August 30, 2023 (the "Motion") and received by the court on August 31, 2023, and the court having reviewed the Motion and the court file and being otherwise duly advised hereby FINDS and ORDERS as follows:

1. Plaintiff filed a successive Motion to Disqualify a trial court judge pursuant to Fla. R. Gen. Prac. & Jud. Admin. 2.330(i).
2. The court finds that asking clarifying questions regarding potential legal theories during a hearing when all parties have the ability to respond to the court's inquiries does not constitute a legal basis for a successive disqualification.
3. Accordingly, the Motion is **denied**.

DONE and ORDERED in chambers in Orange County, Florida on the date set forth in the electronic signature below.


eSigned by Heather Pinder Rodriguez 08/31/2023 11:35:01 5cus21R
Heather Pinder Rodriguez
Circuit Judge

Order from Pinder-Rodriguez refusing to recuse from case after having gave helpful advice to Walson.

3. Moliere Dimanche v. Lauren Hamner and Julia L. Frey

2023- CC-024147-O.

4. Dimanche v. City of Orlando, et al., Case No. 2023-CA-015345-0.
5. Dimanche v. Dyer, et al., Case No. 2023-CA-16800
6. Dimanche v. Mina, Case No. 2023-CA-17792-O
7. Dimanche v. Wonsetler, et al., Case No. 2025-CC-006283-O.

503. Not a single case was found to have been frivolous, and Pinder-Rodriguez knew this. This highlights why §68.093 is unconstitutional and the State of Florida must be prohibited from enforcing it.

504. Even though the statute prohibits this declaration “if the court finds that the action was commenced, prosecuted, or maintained in good faith” there are no mechanisms in place to enforce it. For example, in *Dimanche v. Jackson*, 6:22-cv-2073-CEM-DCI, multiple orders were entered throughout the litigation that confirmed merit to the action. The Supreme Court of the United States even docketed that dispute for the Opening Conference of 2024, and conferred on it twice. Even though they denied the cert petition, its consideration alone confirms the petition was not frivolous. The 11th Circuit Opined on that same case and even alluded to the fact that the Plaintiff/Appellant was correct that the district erred in not issuing a preliminary injunction,

but that the Plaintiff had failed to foresee the effect that an appeal had on that request. Nothing about that litigation was frivolous.

505. In case 2023-CA-013381-0, it was Pinder-Rodriguez who prevented that case from reaching a jury, and even there, she didn't even make a finding of frivolousness. That case was filed pursuant to fraud and newly discovered evidence, and was the case wherein the bank records were discovered demonstrating even more fraud. In fact, when that case was taken on appeal in case 6D2023-3568, the 6th DCA immediately referred it for mediation, on its own accord:

EXHIBIT DD - 6th DCA Mediation Order in Rodriguez appeal

Initial Mediation Order ~ This case is being reviewed by the Court to determine whether it is appropriate for appellate mediation. Parties must visit the Court's website, <https://6dca.flcourts.gov>, to find the Mediation Questions & Answers, Mediation Questionnaire, and Confidential Statement Regarding Appropriateness of Appellate Mediation that must be completed and filed with

the Court. Within 10 days from the date of this order, the Mediation Questionnaire and the Confidential Statement Regarding Appropriateness of Appellate Mediation must be e-filed through the Statewide Florida Courts E-Filing Portal.

BE ADVISED THAT OPPOSING COUNSEL
SHOULD NOT BE SERVED COPIES OF THE
CONFIDENTIAL STATEMENT REGARDING
APPROPRIATENESS OF APPELLATE MEDIATION.

When filing the Confidential Statement through the Statewide Florida Courts E-Filing Portal, DO NOT CHECK "SERVE ALL." FAILURE TO ENSURE ALL BOXES FOR E-SERVICE ARE UNCHECKED WILL RESULT IN PARTIES BEING SERVED AND WAIVER OF CONFIDENTIALITY. If you are not representing a party in this appeal and therefore do not intend to submit the Mediation Questionnaire and Confidential Statement, you must file a Notice of Non-Representation, electronically, within ten

days of the date of this order in order for the Court to remove your designation as counsel of record.

506. For a second time, a case Pinder-Rodriguez used to declare the Plaintiff a vexatious litigant was not frivolous at all.
507. In cases 2023-CA-015345-O and 2023-CA-16800-O, both have documented instances of the presiding judges finding that the case had merit, one from judge A. James Craner, and another from judge Lisa Munyon. In case 16800, the Plaintiff testified that Alban set him up with a bogus 911 call in order to interfere with the 2023 mayoral race, no different from what has been alleged here. In response to the Plaintiff's testimony, judge Craner stated "I find you to be a credible witness".
508. Plaintiff actually abandoned case 15345 because he had been discouraged and judge Munyon revived it. On December 5th, 2024, the Chief Judge of the Ninth Judicial Circuit revived an election interference case. The idea that this would happen for a case brought in bad faith is absurd.
509. For the third time, a case Pinder-Rodriguez deemed to be frivolous was clearly found to not have been frivolous by the presiding judge. Additionally, the Plaintiff voluntarily dismissed that case as he had

EXHIBIT EE

Filing # 212226525 E-Filed 12/05/2024 10:31:47 AM

IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT, IN AND
FOR ORANGE COUNTY, FLORIDA

CASE NUMBER: 48-2023-CA-014264-O

MOLIERE DIMANCHE
Plaintiff(s),

vs.

CITY OF ORLANDO, STEPHANIE
HERODOCIA, BILL COWLES
Defendant(s).

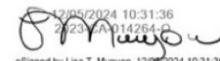
ORDER CANCELLING HEARING

THIS CAUSE having come before the Court and the Court being otherwise duly advised in the premises it is hereby

ORDERED and ADJUDGED that the lack of prosecution hearing scheduled for December 17, 2024 is cancelled. The parties are directed to continue to move the case forward to resolution.

If there are parties not receiving service through the Florida Courts e-filing Portal, counsel will serve a copy of the order via U.S. Mail to the non-e-filing parties and file a certificate of service in the court file no later than three days from the date of this order.

DONE and ORDERED in Orange County, Florida on the date shown on the electronic signature.



12/05/2024 10:31:36
212226525-014264-O

Lisa T. Munyon
Circuit Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was filed with the Clerk of the Court this 5th day of December, 2024 by using the Florida Courts E-Filing Portal System. Accordingly, a copy of the foregoing is being served on this day to all attorney(s)/interested parties identified on the

1

Order from judge Munyon cancelling want of prosecution hearing and ordering case to resolution

become a candidate for another office, and had already invested time into that race.

510. Case 2025-CC-006283-O, which is a part of the conspiracy alleged herein, was dismissed without prejudice to refile. Plaintiff did not refile as he was gathering evidence for this instant action, given the fact that the proceedings were rigged.

511. Case 2023- CC-024147-O was administratively closed and, in theory, not fully resolved, and case 2023-CA-17792-O highlights how the Orange County Sheriff's Office is complicit in this conspiracy because the Plaintiff was not permitted to file complaints.

512. Not a single case was allowed to go before a jury.

513. In sum, the order declaring the Plaintiff a vexatious litigant is not justified, designed to oppress the Plaintiff, and both Pinder-Rodriguez and Walson directed Wonsetler to use it as a weapon against the Plaintiff on the exact same day Pinder-Rodriguez issued the order. Wonsetler, acting on behalf of the Eastwood Community Association, a co-defendant alongside the Plaintiff, filed the malicious order as a co-defendant to help the Plaintiff, Lakeview Loan Servicing, clearly demonstrating that she had manipulated the position of Eastwood as a co-defendant to rig the foreclosure proceedings so that the home would be auctioned to her favor.

514. Smith was also directed to use the same order in a scam Unlawful Detainer action she brought against the Plaintiff in case 2025-CC-023500-O.
515. While the vexatious litigant statute's purpose is designed to prevent the *future* initiation of actions, both Wonsetler and Smith used this weapon to prevent the Plaintiff from *defending* himself in actions wherein he was served with a lawsuit. This is because the intent behind Pinder-Rodriguez's actions were not just to prevent the *initiation* of actions, it was to *silence* the Plaintiff, whether he is a Defendant or Plaintiff.
516. Smith's pattern of misuse began in the Opal foreclosure (Case No. 2022-CA-010314-O), where, as counsel for Pondview Properties, she opposed Plaintiff's Verified Objection to the sham sale. Smith falsely argued it was "unsworn" to expedite the fixed auction.
517. Smith's escalation in the Jupiter Hills dispute intertwined with the HOA lien scam: After Alvarez's pretextual onboarding deception and Wonsetler's invalid lien, Smith filed an unlawful detainer action on behalf of Kimberly Galvin, who is the daughter of Diane Bruno, in late October 2024. This detainer, styled as eviction was not a good-faith estate defense but a maneuver to oust Plaintiff, and assist

Lakeview's parallel foreclosure case, which Smith did not enter to defend the estate's interest in the property.

518. Smith entered solely to "clear the field" for Lakeview's acceleration of the foreclosure.
519. In the Lakeview foreclosure, the Defendants accelerated the sham foreclosure by sending Srivastava to invade the premises and take a picture of the Plaintiff's wife in the privacy of her own home, without her knowledge. He then published this photo and it was used to sustain service of process so that the foreclosure would be accelerated..
520. Pinder-Rodriguez's complicity peaked in this Lakeview action: On Wonsetler's motion, on Eastwood's behalf, despite co-defendant status Wonsetler published the order issued by Pinder-Rodriguez declaring Plaintiff a "vexatious litigant" in order to hinder his defense. While silencing the Plaintiff's defenses was key to taking the property, Lakeview sought to have a guardian ad litem appointed on behalf of Diane Bruno. Florida has a prohibition on this exact practice when there is a personal representative. This was just another way to silence the Plaintiff's defenses and assign defense of the residence to someone who would help accelerate the foreclosure.

521. The end goal was to have an illegal guardian ad litem appointed, dispossess the Plaintiff, accelerate the sale of the property, provide no defense on behalf of the estate in the foreclosure proceedings, and unjustly enrich themselves at the cost of the Plaintiff's homestead and peace. For this reason, §61.403 must be declared unConstitutional.
522. As of November 19, 2025, the vexatious order remains, hindering defenses to the Jupiter Hills residence. Smith's detainer and Wonsetler's notice exemplify abuse, demanding vacatur, sanctions and findings on the Constitutionality on the tactics used to perfect these schemes.
523. Upon information and belief Plaintiff asserts that in a rabid effort to dispossess the Plaintiff of the Jupiter Hills residence, Smith filed an unlawful detainer action without the knowledge or consent of Kimberly Galvin.
524. Upon learning that an heir to the Estate of Diane Bruno had been located by local attorneys aimed at taking the Jupiter Hills property from the Plaintiff and that a probate matter had been opened, Plaintiff reviewed the case details and learned of Kimberly Galvin.
525. In good faith, Plaintiff traveled to Berkeley, Massachusetts and met Galvin at her home. As a probate matter had been opened, Plaintiff thought it prudent to provide Galvin with her mother's credit cards,

social security card, driver's license and journals. Galvin accepted these items and explained that she had been contacted by attorneys and realtors from Orlando who were trying to purchase the property. She stated that while she was appointed personal representative yet, she would transfer the property to the Plaintiff. Plaintiff and Galvin discussed his adverse possession claim, and Plaintiff offered to reconcile the claim with the estate, but Galvin insisted that she would transfer the title to the Plaintiff, whether by sale or otherwise. Together with her daughter, Galvin discussed the property and why she was willing to transfer title to the Plaintiff. Plaintiff learned that Galvin had been estranged from Bruno for decades. Galvin then spoke to the Plaintiff's wife by FaceTime before exchanging numbers with the Plaintiff. Galvin consented to Plaintiff's continued possession of the premises until she became personal representative and could work out how the transfer of title could take place.

526. Without knowing any of this, Smith filed an unlawful detainer action in Galvin's name, breaching the August 12th, 2025 contract.
527. After being served with the complaint for unlawful detainer, Plaintiff verified these facts and provided an affidavit attesting to the contractual relationship (the Agreement). In response to this, Smith deployed the vexatious litigant order from Pinder-Rodriguez to hinder

the Plaintiff's defenses, and coached Galvin into filing a police report about the August 12th, 2025 Agreement. This was solely for the purpose of dispossessing the Plaintiff by any means, and solely in response to him filing defensive pleadings.

528. In a response to the Plaintiff's Answer & Affirmative Defenses in that case, Smith defamed and slandered the Plaintiff as a "known fraudster". The Plaintiff has never committed fraud in his life, and Smith weaponized the convictions achieved by way of extortion from Calderon and Edwards to support defamatory remarks.
529. Smith also asserted that Plaintiff "confront[ed]" Galvin about the property, and "claimed" to have property belonging to her mother. This is a part of a series of material misrepresentations Smith utilized solely to accelerate the scam foreclosure.
530. There was no confrontation at all, and, as stated above, the Plaintiff provided Galvin with personal items including a license and credit card. Not only is there video evidence of this, there is evidence that Dimanche and Galvin's conversation lasted for approximately 41 minutes at Galvin's home.
531. Smith also has accused Plaintiff of trying to "steal" property. The Plaintiff followed the law and filed the prerequisite documents with the Orange County Property Appraiser, and defended the property

EXHIBIT FF

Filing # 236115084 E-Filed 11/19/2025 09:28:29 AM

IN THE COUNTY COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA

KIMBERLY GALVIN, as the Personal
Representative of the ESTATE OF DIANE
BRUNO,

Plaintiff
v.
CASE NO.: 2025-CC-023500-O

MOLIERE DIMANCHE, an individual,
UNKNOWN PARTY IN POSSESSION,

Defendants.
/

**PLAINTIFF'S REPLY TO DEFENDANT'S
VERIFIED RESPONSE TO COMPLAINT FOR UNLAWFUL
DETAINER AND MOTION FOR FINAL JUDGMENT OF POSSESSION**

Plaintiff, KIMBERLY GALVIN, as the Personal Representative of the ESTATE OF DIANE BRUNO, by counsel, hereby replies to the "Verified Response to Complaint for Unlawful Detainer" filed by Defendant, MOLIERE DIMANCHE ("Dimanche") on November 13, 2025,¹ and files the Motion for Final Judgment of Possession against both Defendants and states as follows:

I. Introduction.

Dimanche is a convicted felon and known fraudster, who was recently declared a vexatious litigant pursuant to Section 68.093, *Florida Statutes*, and is well known to the judiciary in Orange County, Florida, the Sixth District Court of Appeal, the United States District Court for the Middle District of Florida, and the United States Court of Appeals for the Eleventh

¹ Defendant, Moliere Dimanche filed his pleading *pro se* and titles it as a "Verified Response to Complaint for Unlawful Detainer." While somewhat amorphous, the document does not respond to the allegations of the Complaint, paragraph by paragraph, as is required for an Answer, yet it contains purported "affirmative defenses." The document simultaneously seeks dismissal with prejudice (*Response*, ¶ 5) but does not accept all allegations of the Complaint as true and seeks to include facts from outside the four corners of the Complaint. Plaintiff respectfully submits this Reply to address issues raised by Dimanche, regardless of how the Court characterizes the document and seeks a final judgment of possession.

Motion from Smith defaming Plaintiff as a "convicted felon" and "known fraudster".

from individuals who were actually attempting to steal the property.

These statements are defamatory and has caused great harm to the

Plaintiff's good name.

532. At all times, the Orange County Sheriff's Office has been central to illegal dispossessions, and must be required to employ a method in which to detect, analyze and reject void court orders. On at least two occasions, the Orange County Sheriff's Office has unlawfully executed writs of possession issued by Calderon.
533. They did so in the Opal Drive case, and in Griffin v. Calderon, 6:24-cv-01432, it was brought to the attention of the federal courts that Calderon usurped the jurisdiction of County Court judges in an unlawful detainer claim and issued a writ of possession that displaced Dathan Griffin and Benjamin Rojas. That displacement severely affected their lives and during the process the Orange County Sheriff's Office impounded Mr. Rojas' dog, who immediately died.

Defendants Caused Dimanche Lifelong Harm

534. As a result of the immense trauma Dimanche endured with the Defendants, he has suffered and continues to suffer from emotional distress.
535. Without being intoxicated, Dimanche suffered from horrific nightmares of being kidnapped and tracked by police. He had difficulty eating, sleeping, his relationships with his family suffered,

and he ended his YouTube and Facebook podcasts that he loved to do regularly because of the anxiety, the inability to focus and the inability to communicate, resulting in a loss of earning potential.

536. The fact that he had to campaign while a fraudulent warrant was out for his arrest cost him donors and valuable connections.

EXHIBIT GG



Dimanche campaigning for Mayor during a podcast appearance with an active capias issued by Calderon.

537. Dimanche's faith in the rule of law is all that allowed him to get through these events even though the threat of corruption and dangerous government officials produced trauma that consumed him every day.

538. Following his ordeals with the extortion, Dimanche struggled with the physical and mental manifestations of the trauma, developed a bad habit of chain-smoking cigarettes and drastically lost weight.

539. Dimanche will forever live with the psychological repercussions of fear, and exploitation he endured.

540. Thanks to the protections guaranteed under the United States Constitution, the Constitution of the State of Florida, and §1983 he is now ready and able to confront the Defendants and hold them, and those who enabled them to rob, extort, frame, defame, and falsely accuse him, accountable for their actions.

FIRST CAUSE OF ACTION: Civil RICO

Under 18 U.S.C. §§1961–1968 (Against Defendants State of Florida, Florida Department of Corrections, Latimore, Dominic, Redfearn, McDonald, Mangrum, Calderon, Pinder-Rodriguez, Beamer, Navarro, Blechman, Wallsh, Edwards, Worrell, Stokes, Mendoza, Irick, Geist, Labelle, Hanny D., Rochelle K. and Ninth Judicial Circuit as Enterprise)

The Individual Defendants conducted the affairs of the Ninth Judicial Circuit of Florida, a legal entity created by statute, affecting interstate commerce through judicial proceedings, through a pattern of racketeering activity, in violation of 18 U.S.C. §1962(c). The enterprise consists of associated-in-fact actors, including but not limited to judges like Latimore and McDonald, prosecutors like Dominic and Mangrum, and public defenders like Redfearn, sharing a common purpose: to deprive citizens like Plaintiff of rights via corruption, distinct from mere official duties. Predicate acts include: wire/mail fraud (18 U.S.C. §1343/1341); obstruction of justice (18 U.S.C. §1503); and honest services fraud (18 U.S.C. §1346). Defendants' conduct proximately caused injury to Plaintiff's business/property (3,078 days' lost liberty, seized assets, and barred opportunities), warranting dissolution of the Ninth Judicial Circuit as a criminal enterprise and injunction under §1964(a).

SECOND CAUSE OF ACTION: Peonage; Obstructing Enforcement

Under 18 U.S.C. §1581, et seq. and §1595 (Against Ninth Judicial Circuit in and for Orange County, Florida as an enterprise, Lowndes defendants, City of Orlando Defendants, FDOC, Latimore, Dominic, Redfearn, Mangrum, McDonald, County Defendants, Orange County, John Beamer and Geist)

Plaintiff was kidnapped within the meaning of 18 U.S.C. §1581, and as a result, the enterprise, Lowndes, Dymond, and Frey "benefit[ed], financially or by receiving anything of value" within the meaning of 18 U.S.C. §1593A. The Defendants conspired to violate this statute (18 U.S.C. §1594) and obstructed its enforcement (18 U.S.C. §1581(b)). Defendants Montes, Doe#1, and Doe #2 kidnapped Plaintiff, and all Defendants financially benefitted by holding Dimanche captive while Lowndes, Dymond, Frey, and others received the Mills Avenue residence.

Defendants formed a venture as defined by 18 U.S. Code §1589(a) by obtaining property by force, threats, or **abuse of law or legal process**, resulting in severe injury and economic harm. Plaintiff was subjected to peonage due to the void conviction manufactured by Latimore and his subsequent forced labor within the Florida Department of Corrections, and again after the kidnapping by Montes, that began with the altering of documents by Orange County Comptroller staff and Property Appraiser staff, prompting Defendant Jackson to use those changes to preempt the home invasion, kidnapping and armed robbery.

THIRD CAUSE OF ACTION: Violation of The Florida Deceptive and Unfair Trade Practices Act (FDUTPA)

Under Fla. Stat. §501.201, et seq. (Against All Defendants)

The unlawful taking of the residences located at 921 S. Mills Avenue and 2130 Opal Drive from the Plaintiff's peaceful possession, and ongoing efforts to usurp the Jupiter Hills residence constitutes "trade or commerce" as the Defendants engaged in "unfair or deceptive acts or practices" in the conduct thereof (§501.204). Specific violations include the unconscionable act of home invasion, the deceptive act of Edwards pretending to be an assistant state attorney, "unfair methods of competition" (§501.202(1)) where Frey and Lowndes tentatively controlled police, government agencies, and judges to prevail in the property dispute, the theft of Dimanche's identity to take the Opal Drive property and take the surplus, and the unlawful schemes to take the Jupiter Hills residence, resulting in property loss and economic harm.

**FOURTH CAUSE OF ACTION: Deprivation of Rights Under Color of Law,
Federally Protected Activities, Hate Crimes**

Under 18 U.S.C. Ch. 13 §§242,245(2)(b) and 42 U.S. Code §3631 (Against All Defendants)

Plaintiff, a Black man and a Haitian-American citizen, was a candidate for elective office (§245(2)(b)1(A)) and was intimidated and interfered with. The Defendants violated §§242 and 245 by targeting Plaintiff based on his race when Hamner directed police to "that Black man," Alban targeting Plaintiff while pursuing the Black vote, Wallsh's malicious prosecution, all constituting hate-motivated crimes and election interference, resulting in forced withdrawal from the election and economic harm. The deprivation of his right to due process resulted in him being falsely imprisoned in the Florida Department of Corrections based on falsified documents and a conviction that never happened. His right to defend himself and his homestead has been deprived with the malicious use of an unwarranted status cast upon him that has robbed him of the ability to mount a legal defense.

FIFTH CAUSE OF ACTION: Unlawful Detainer

Under Florida Statute §82.03 (Against Frey, Hamner, Walson)

The Defendants' acts and omissions, taken separately and/or together, constitute violations of §82.03. Plaintiff has a cause of action for Unlawful Detainer due to the illegal forced entry and continued withholding of the residence located at 921 S. Mills Avenue against defendants Frey, Hamner, and Walson.

SIXTH CAUSE OF ACTION: Unlawful Detainer

Under Florida Statute §82.03 (Calderon, Pondview Properties, Salado)

The Defendants' acts and omissions, taken separately and/or together, constitute violations of §82.03. Plaintiff has a cause of action for Unlawful Detainer due to the illegal forced entry and continued withholding of the residence located at 2130 Opal Drive against Defendants Calderon, Pondview Properties, and Salado.

SIXTH CAUSE OF ACTION: Civil Rights

Under 42 U.S.C. §1983 (Against All Defendants)

Defendants violated Plaintiff's Civil Rights under the Color of Law. Specifically, violations include:

- **First Amendment:** Retaliation for initiating this Civil Rights action.
- **Fourth Amendment:** Kidnapping, home invasion, extortion, and unreasonable search and seizure.
- **Eighth Amendment:** Excessive bail after the first kidnapping.
- **Fourteenth Amendment:** Denial of Due Process and Equal Protection

SEVENTH CAUSE OF ACTION: Unjust Enrichment

Under 18 U.S.C. §1951 (Against All Defendants as participants in the Ninth Judicial Circuit in and for Orange County, Florida as an enterprise)

A cause of action exists for unjust enrichment against all Defendants Where “an obligation imposed by law to do justice even though it is clear that no promise was ever made or intended”. All Defendants had an obligation to do justice and did not. Defendants benefited at Dimanche’s expense by taking things for which he appreciated, including property held in his peaceful possession, his liberty, his peace of mind, his vehicle, his privacy, his status and his dignity. No adequate remedy at law is available to him in light of his status, and the benefits conferred upon the defendants included things of value. In return, Dimanche received nothing.

EIGHTH CAUSE OF ACTION: Malicious Prosecution

(Lowndes Defendants, County Defendants, City Defendants, Comptroller Defendants, United States Defendants, and Ninth Judicial Circuit in and for Orange County, Florida as an enterprise)

The Defendants, particularly prosecutors, law enforcement, and judges, acted with evil intent and without due process in initiating and continuing the criminal proceedings against the Plaintiff without probable cause and solely to advance the financial gain of the enterprise and its associates.

NINTH CAUSE OF ACTION: False Imprisonment

(Lowndes Defendants, County Defendants, City Defendants, Comptroller Defendants, United States Defendants, and Ninth Judicial Circuit in and for Orange County, Florida as an enterprise)

The Defendants, particularly Montes, Doe#1, and Doe #2, intentionally confined and restrained the Plaintiff without legal justification, resulting in lost liberty, lost property, economic and emotional harm.

**TENTH CAUSE OF ACTION: Intentional Infliction of Emotional Distress
(IIED)**

(Against All Defendants)

The Defendants' conduct—including the prolonged false imprisonment, racially motivated home invasion, extortion, and repeated denial of property rights over a 17-year period—was extreme and outrageous, and intentionally or recklessly caused the Plaintiff severe emotional distress and anxiety.

ELEVENTH CAUSE OF ACTION: Declaratory Judgment and Injunctive Relief

(Against State of Florida)

Plaintiff seeks a declaration that the **Florida Vexatious Litigant Statute (§68.093)** is unconstitutional as applied; that the **7-year provision for Adverse Possession** (§95.16/§95.18) is unconstitutional as applied to homestead claimants; and seeks an order shortening the adverse possession period to one (1) year consistent with homestead requirements.

TWELFTH CAUSE OF ACTION: Defamation/Slander

(Against Frey, Piccolo, Walson, Pinder-Rodriguez, Wonsetler, Wonsetler & Webner P.A., Lowndes)

Defendants provided written statements, as facts, to a third party. Those written statements harmed Dimanche's reputation. The statements were false, and the Defendants' neglected their obligations to speak truthfully. These statements include the false assertion that Dimanche was convicted of burglary in 2008, that Dimanche is a liar, "steal[s]", and a "known fraudster". Defendants used these false and defamatory statements to prevail in litigation concerning property disputes, and have caused harm to Dimanche's reputation, especially at a time wherein he is a candidate for public office and a notable figure for criminal justice reform.

THIRTEENTH CAUSE OF ACTION: Declaratory Judgment

(Against State of Florida)

Plaintiff seeks a declaration that allowing **conflicted judges to resolve motions for their own disqualification** is unconstitutional. Plaintiff also seeks a declaration that the use of **pre-trial disposition mechanisms (Summary Judgment, Judgment on the Pleadings)** to decide disputed facts is unconstitutional as it hinders the **Seventh Amendment right to jury trial**. Dimanche seeks a declaration that declares that the declining presentation of cases to juries is a result of systemic misuse of pretrial mechanisms. Dimanche seeks a declaration that pretrial mechanism have been misused in this case for the specific purpose of keeping merits determinations away from juries. This is a case wherein new evidence arose every time those pre-trial mechanisms were abused.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Moliere Dimanche prays that the Court enter judgment against Defendants, jointly and severally, and grant the following relief:

A. Monetary Damages

1. For a money judgment representing **Compensatory Damages** for economic loss in the amount of **\$50,000,000.00**, plus interest.
2. For a money judgment for **Mental Pain, Anguish, Severe Emotional Distress, and Trauma** in the amount of **\$300,000,000.00**, plus interest.
3. For a money judgment for **Punitive Damages** to punish and deter Defendants' malicious, reckless, and callous conduct, in the amount of **\$500,000,000.00**.
4. For **Treble Damages** for violations of FDUPTA, 18 U.S.C. §1962 (Civil RICO) and §1595, where applicable.

B. Declaratory Relief

1. A Declaration that **Florida Statute §68.093 (Vexatious Litigant Statute)** is **unconstitutional** as applied to the Plaintiff, violating the First and Fourteenth Amendments of pro se litigants.

2. A Declaration that the **7-Year Provision for Adverse Possession** (§95.16/§95.18) is **unconstitutional** as applied to good-faith homestead claimants, and should be judicially shortened to **one (1) year**.
3. A Declaration that the practice allowing **conflicted Judges to unilaterally resolve motions for their own disqualification or recusal** is **unconstitutional** and violates Due Process.
4. A Declaration that the use of **pre-trial disposition mechanisms (Summary Judgment, Judgment on the Pleadings)** to obstruct a jury trial in cases involving disputed facts violates the **Seventh Amendment**.
5. A Declaration that the Plaintiff holds title in equity to the **Jupiter Hills** residence, and has satisfied Florida homestead requirements.
6. A Declaration that the **2008 conviction** (Case No. 2007-CF-18085-O) is **void ab initio** for lack of jurisdiction and judicial fraud.
7. A Declaration that the prosecutorial acts of **Andrew Edwards** were unlawful, void, and of no legal effect.
8. A Declaration finding that the Defendants unlawfully and tangibly interfered with the **2023 Orlando Mayoral Election, and the District 5 Commissioner's Election**, and a handwritten apology from the Mayor.
9. A Declaration finding Defendants Calderon, Pinder-Rodriguez, Blechman, Navarro, Beamer, Worrell and Russell **unfit to ever hold offices of public trust** in the State of Florida for gross negligence and abuse of office.

C. Injunctive and Equitable Relief

1. **Immediate Return of all Property** in a preliminary injunction, including the residences located at **921 S. Mills Avenue** and **2130 Opal Drive**, and restoration of Plaintiff's title and deed that was taken during the kidnapping.
2. **A Permanent Injunction** against any further proceedings as they relate to foreclosing on, or dispossessing Dimanche of, the **Jupiter Hills** property.
3. **Order of Dissolution** of the Ninth Judicial Circuit as an active RICO enterprise (18 U.S.C. §1964(a)) and of **Eastwood Community Association**.
4. **A Permanent Injunction** barring the enforcement of the vexatious litigant order against the Plaintiff in any court.
5. An **Order** directing the Orange County Sheriff's Office to compose a specific office designated to assess the validity, or lack thereof, of *void* court orders aimed at dispossessing residents, and mandating public input.
6. **A Writ of Mandamus** directing U.S. to present evidence of the Hobbs Act violations to a Federal Grand Jury (18 U.S.C. §3332).
7. **Structural Injunctions** and monitoring of the Ninth Judicial Circuit, Orange County Comptroller, and Orange County Property Appraiser's Office to ensure constitutional due process and non-discriminatory access.
8. **For Attorneys' Fees** and costs pursuant to 42 U.S.C. §1988, 18 U.S.C. §1595(a), and §501.211 (FDUTPA).

9. For prejudgment and post-judgment interest, and for such other and further relief as the Court may deem just and proper.

Dated: November 23, 2025

Orlando, Florida

Respectfully submitted,



MOLIERE DIMANCHE
3200 N. Hiawassee Rd., #682362
Orlando, FL 32868 (407)-639-3034
moliereexpressions@yahoo.com

STATE OF FLORIDA

COUNTY OF ORANGE

The foregoing instrument was acknowledged before me by means of physical presence, this 23rd day of November, 2025 by MOLIERE DIMANCHE who produced a Florida driver's license as identification.



RAUL NEGRON
Notary Public
State of Florida
Comm# HH640144
Expires 2/13/2029


NOTARY PUBLIC

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury of all issues so triable.

Dated: November 23, 2025

Orlando, Florida

Respectfully submitted,



Moliere Dimanche
3200 N. Hiawassee Rd., #682362
Orlando, FL 32868 (407)-639-3034
moliereexpressions@yahoo.com