

In the Circuit Court of the Sixth Judicial circuit

In and for Pinellas County, Florida

Civil Division

Case Number:

24-3892-CI

Neelam Taneja Perry a/k/a

Neelam Taneja

Plaintiff

Vs

Robert' Rocky' Rochford

John

James Peters

Ehsan Joarder

Julie Marcus,

Amanda Coffey

Jane Doe(99)

John Doe(99)

and all other affiliated individuals and organizations

Corporations, businesses and groups

Defendant(s)

Demand Jury Trial

**EMERGENCY INJUNCTION AND COMPLAINT TO CONTEST TO PRIMARY
ELECTION RESULTS OF AUGUST 20, 2024 BASED ON MISCONDUCT,
FRAUD, CORRUPTION**

Comes Now, Plaintiff, Neelam Taneja Perry, candidate for US House of Representatives, Florida, District 14 files a complaint to **CONTEST TO PRIMARY ELECTION RESULTS OF AUGUST 20, 2024 BASED ON MISCONDUCT, FRAUD, CORRUPTION** pursuant to F. S.102.168(3)(a)(c), (d)

PARTIES:

- 1. Robert 'Rocky' Rochford-Candidate for US Congress, Republican, District 14**
- 2. James Peters- Candidate for US Congress, Republican, District 14-alliance of Kathleen Peters on the Canvassing board**
- 3. Ehsan Joarder-Candidate for Us Congress, Republican, District 14**
- 4. Amanda Coffey-Attorney of Pinellas County filed an adversarial lawsuit against the plaintiff..**
- 5. Julie Marcus-Supervisor of Election of Pinellas County**

INTRODUCTION:

Election Integrity is the key to success in Democracy.

STATEMENT OF FACTS:

- 1.Dr. Perry was a candidate for the office of United States House of Representatives, District 14, Tampa/St. Petersburg in the Primary Election held on August 20, 2024.**
- 2.Dr. Perry faced a lot of challenges with campaigning due to corruption.**

3. Dr. Perry went to observe the tabulation of the votes on August 16, 2024 and observed major violations. The votes were being duplicated. But the votes were not being able to be seen. All the mail- ballots were being opened without any proper verification. All the printed ballots were not tabulated but duplicated and then tabulated. See Exhibits.

All the invalid votes were being duplicated.

- 1) As per the Hillsborough Supervisor of Election , it is the same machines and all mail- in ballots and electronic ballots were duplicated.
- 2) All the other candidates had their campaign people on the canvassing board.
- 3) In Pinellas county, had Amanda Coffey, who has an adversarial position with the plaintiff supporting candidate Rochford and Kathleen Peters supporting James Peters.
- 4) In Hillsborough County, Chris Lattimer was supporting Rochford and allowed other campaign personnel. see exhibits
- 5) The ballots didn't qualify for duplication.
- 6) On April 17, 2024 Tampa Bay Times reported that the registered Republicans increased by 58,000 in hillsborough county
- 7) 733 pages of Evidence including affidavits of voters whose mail- in ballots were counted testified that they never voted (Exhibit). All such ballots were assigned to Robert (Rocky) Rochford by Amanda Coffey and to James Peters by Kathleen Peters for James Peters.

On public view the pictures show Ms. Kathleen Peters reading

the ballot before tabulating.

- 8) Massive duplication of mail in ballots. Of note is that the mail- in ballots are more than in- person ballots. And that 700,000 people didn't even vote.
- 9) Mr. Chris Gleason obtained 715 pages of Registered voters who were sent mail- in ballots, that were not requested by the voter. The Plaintiff's opposing candidates violated F.S. 838.022 by taking advantage of that.
- 10) Julie Marcus got 129,000 and Chris Gleason got 24,000 since her staff was fraudulently fabricating votes for her only such that even the Republican candidate for senator for only 68,000. People didn't bother to vote for senator or congressman but only supervisor of election is false
- 11) On July 18, 2024 152,000 mail in ballots were mailed out. It is easy to destroy the votes for the plaintiff , duplicate ballots ,alter ballots and forge ballots.
- 12) Mr. Lattimer tested the machines publicly to show that they were working and required no duplication of electronic ballots. (SeeE Exhibits). These constitutes violation of F.S. 102.168 (c)
- 13) See case Gleason v. Marcus, Pinellas County, 24-003717CI
- 14) See Liccione V. Marcus 8:24-cv-2005 US District court, Middle district of Florida, Tampa Division
- 15) The Opposition Parties were not allowed to review and approve the duplication of ballots.

Duplication Procedures

While each state's ballot duplication process has unique elements, the majority follow the general procedure below:

1. A damaged ballot or defective ballot is identified and set aside for duplication.
2. An election official, part of an official duplication team or accompanied by witnesses, examines the ballot to identify the voter's intent. The team or set of witnesses often includes members of opposing political parties.
3. The election official copies the voter's choices from the original ballot onto a new ballot.
4. The new ballot is scanned by the vote tabulation machine.
5. The new ballot and old ballot are given labels with matching serial numbers, showing which is the duplicate and which is the original.
6. The two ballots are connected and set aside with any other duplicated ballots to be preserved as part of the election record.

Mail-in Ballots:

Mail- Ballots were created by forged signatures or signatures from Artificial Intelligence (AI)

On observation the personnel were not verifying the signatures diligently.

The voters have written affidavits that they did not send in their ballot by mail, but their vote was counted. (See Exhibit)

LEGAL STANDARD

§ 102.168 Contest of election.

OVERVIEW OF STATUTE

This statute governs the procedure by which elections can be contested. The certification of an election can be contested in circuit court by an unsuccessful candidate, a qualified voter, and any taxpayer. The contestant has 10 days after

midnight on the date of the certification. There are four grounds for contesting an election, and the canvassing board, the Elections Canvassing Commission, and the successful candidate can all be indispensable parties, depending on which type of election is being contested.

STATUTE

(1) Except as provided in s. 102.171, the certification of election or nomination of any person to office, or of the result on any question submitted by referendum, may be contested in the circuit court by any unsuccessful candidate for such office or nomination thereto or by any elector qualified to vote in the election related to such candidacy, or by any taxpayer, respectively.

(2) Such contestant shall file a complaint, together with the fees prescribed in chapter 28, with the clerk of the circuit court within 10 days after midnight of the date the last board responsible for certifying the results officially certifies the results of the election being contested.

(3) The complaint shall set forth the grounds on which the contestant intends to establish his or her right to such office or set aside the result of the election on a submitted referendum. The grounds for contesting an election under this section are:

(a) Misconduct, fraud, or corruption on the part of any election official or any member of the canvassing board sufficient to change or place in doubt the result of the election.

(b) Ineligibility of the successful candidate for the nomination or office in dispute.

(c) Receipt of a number of illegal votes or rejection of a number of legal votes sufficient to change or place in doubt the result of the election.

(d) Proof that any elector, election official, or canvassing board member was given or offered a bribe or reward in money, property, or any other thing of value for the purpose of procuring the successful candidate's nomination or election or determining the result on any question submitted by referendum.

(4) The canvassing board responsible for canvassing the election is an indispensable party defendant in county and local elections. The Elections Canvassing Commission is an indispensable party defendant in federal, state, and multicounty elections and in elections for justice of the Supreme Court, judge of a district court of appeal, and judge of a circuit court. The successful candidate is an indispensable party to any action brought to contest the election or nomination of a candidate.

(5) A statement of the grounds of contest may not be rejected, nor the proceedings dismissed, by the court for any want of form if the grounds of contest provided in the statement are sufficient to clearly inform the defendant of the particular proceeding or cause for which the nomination or election is contested.

(6) A copy of the complaint shall be served upon the defendant and any other person named therein in the same manner as in other civil cases under the laws of this state. Within 10 days after the complaint has been served, the defendant must file an answer admitting or denying the allegations on which the contestant relies or stating that the defendant has no knowledge or information concerning the allegations, which shall be deemed a denial of the allegations, and must state any other defenses, in law or fact, on which the defendant relies. If an answer is not filed within the time prescribed, the defendant may not be granted a hearing in court to assert any claim or objection that is required by this subsection to be stated in an answer.

(7) Any candidate, qualified elector, or taxpayer presenting such a contest to a circuit judge is entitled to an immediate hearing. However, the court in its discretion may limit the time to be consumed in taking testimony, with a view therein to the circumstances of the matter and to the proximity of any succeeding election.

(8) In any contest that requires a review of the canvassing board's decision on the legality of a vote-by-mail ballot pursuant to s. 101.68 based upon a comparison of the signature on the voter's certificate and the signature of the elector in the registration records, the circuit court may not review or consider any evidence other than the signature on the voter's certificate and the signature of the elector in the registration records. The court's review of such

issue shall be to determine only if the canvassing board abused its discretion in making its decision.

My Public viewing: see Exhibit 1. I observed that the people on the panel were coloring both pages. As per the report of Chris Lattimer, they received a lot of blank ballots in the mail.

COUNT I

ELECTION FRAUD

The Analysis anomalies of Hillsborough County and Pinellas County results prove Fraud based on duplication process, discarded ballots, fabricated ballots., counting invalid ballots.

Also include facts narrated in all counts

ARGUMENT

1. The Duplication process violates the the Supreme Court's decision *Bush v. Gore*. *A damaged or defective ballot is an invalid ballot and cannot be counted.*
2. The voters intent cannot be fabricated by a canvassing board as it is a subjective opinion.
3. 96% of the people voted for Julie Marcus and only 40% for the Senator and about 0.75 % for the US House of Representatives

This could be voter apathy or Corruption. The second being the most obvious.

Case Name: Bush v. Gore

Citation: 531 U.S. 98

Federal District Court: Eastern District of Virginia

Year: 2000

Case URL:

[https://www.ravellaw.com/opinions/ffe23a532d148e534fb47425579e2894?query=531%20U\[...\]](https://www.ravellaw.com/opinions/ffe23a532d148e534fb47425579e2894?query=531%20U[...])

Case Summary: *Bush v. Gore* held that Florida's recount procedures were inconsistent with the minimum procedures necessary to protect the

fundamental right of each voter in the instance of a statewide recount under the authority of a single state judicial officer.

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- Fla. Jur. 2d Elections s 195, Nature of election contest; jurisdiction and venue
- Fla. Jur. 2d Elections s 196, Parties
- Fla. Jur. 2d Elections s 196, Parties
- Fla.. 2d Elections s 198, Complaint; answer
- Fla. Jur. 2d Elections s 199, Hearing and evidence

LEGAL ARGUMENT with further facts

Plaintiff repeats all above facts and evidence and also states:

Rochford slandered the Plaintiff on the case filed by Amanda Coffey during his campaign. Amanda Coffey was on the Canvassing board counting and reviewing ballots of the plaintiff.

James Peters had s an alliance of Kathleen Peters. Kathleen Peters was on the canvassing boards and reviewed ballots before they could be scanned. (See Exhibit). James Peters did absolutely no campaigning in Pinellas County and did not show up for any event s

Ehsan Joarder was canvassing the lawsuit of Amanda Coffey (See Exhibit)

Julie Marcus is present at the counting of her own ballots.(See Exhibit)

Julie Marcus got 129,000 votes and Chris Gleason got 24,000 vote.(See Exhibit) Further, Rick Scott got 68,000 votes. 86,000 voters didn't care about voting for the senator but yet they voted for supervisor of elections. That is absurd.

Chris Lattimer checked the machines publicly but they didn't work on the Election Day. There are more mail-ballots than people voted in person.

The less numbers of voters who voted suggests destruction of ballots.

101.68 Canvassing of vote-by-mail ballot.—

(1)(a) The supervisor of the county where the absent elector resides shall receive the voted ballot, at which time the supervisor shall compare the signature of the elector on the voter's certificate with the signature of the elector in the registration books or the precinct register to determine whether the elector is duly registered in the county and must record on the elector's registration record that the elector has voted. During the signature comparison process, the supervisor may not use any knowledge of the political affiliation of the elector whose signature is subject to verification.

(b) An elector who dies after casting a vote-by-mail ballot but on or before election day shall remain listed in the registration books until the results have been certified for the election in which the ballot was cast. The supervisor shall safely keep the ballot unopened in his or her office until the county canvassing board canvasses the vote pursuant to subsection (2).

(c) If two or more vote-by-mail ballots for the same election are returned in one mailing envelope, the ballots may not be counted.

(d) Except as provided in subsection (4), after a vote-by-mail ballot is received by the supervisor, the ballot is deemed to have been cast, and changes or additions may not be made to the voter's certificate.

(2)(a) The county canvassing board may begin the canvassing of vote-by-mail ballots upon the completion of the public testing of automatic tabulating equipment pursuant to s. 101.5612(2), but must begin such canvassing by no later than noon on the day following the election. However, notwithstanding any such authorization to begin canvassing or otherwise processing vote-by-mail ballots early, no result shall be released until after the closing of the polls in that county on election day. Any supervisor, deputy supervisor, canvassing board member, election board member, or election employee who releases the results of a canvassing or processing of vote-by-mail ballots prior to the closing of the polls in that county on election day commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(b) To ensure that all vote-by-mail ballots to be counted by the canvassing board are accounted for, the canvassing board shall compare the number of ballots in its possession with the number of requests for ballots received to be counted according to the supervisor's file or list.

(c)1. The canvassing board must, if the supervisor has not already done so, compare the signature of the elector on the voter's certificate or on the vote-by-mail ballot cure affidavit as provided in subsection (4) with the signature of the elector in the registration books or the precinct register to see that the elector is duly registered in the county and to determine the legality of that vote-by-mail ballot. A vote-by-mail ballot may only be counted if:

a. The signature on the voter's certificate or the cure affidavit matches the elector's signature in the registration books or precinct register; however, in the case of a cure affidavit, the supporting identification listed in subsection (4) must also confirm the identity of the elector; or

b. The cure affidavit contains a signature that does not match the elector's signature in the registration books or precinct register, but the elector has submitted a current and valid Tier 1 identification pursuant to subsection (4) which confirms the identity of the elector.

For purposes of this subparagraph, any canvassing board finding that an elector's signatures do not match must be by majority vote and beyond a reasonable doubt.

2. The ballot of an elector who casts a vote-by-mail ballot shall be counted even if the elector dies on or before election day, as long as, before the death of the voter, the ballot was postmarked by the United States Postal Service, date-stamped with a verifiable tracking number by a common carrier, or already in the possession of the supervisor.

3. A vote-by-mail ballot is not considered illegal if the signature of the elector does not cross the seal of the mailing envelope.

4. If any elector or candidate present believes that a vote-by-mail ballot is illegal due to a defect apparent on the voter's certificate or the cure affidavit, he or she may, at any time before the ballot is removed from the envelope, file with the canvassing board a protest against the canvass of that ballot, specifying the precinct, the voter's certificate or the cure affidavit, and the reason he or she believes the ballot to be illegal. A challenge based upon a defect in the voter's certificate or cure affidavit may not be accepted after the ballot has been removed from the mailing envelope.

5. If the canvassing board determines that a ballot is illegal, a member of the board must, without opening the envelope, mark across the face of the envelope: "rejected as illegal." The cure affidavit, if applicable, the envelope, and the ballot therein shall be preserved in the manner that official ballots are preserved.

(d) The canvassing board shall record the ballot upon the proper record, unless the ballot has been previously recorded by the supervisor. The mailing envelopes shall be opened and the secrecy envelopes shall be mixed so as to make it impossible to determine which secrecy envelope came out of which signed mailing envelope; however, in any county in which an electronic or electromechanical voting system is used, the ballots may be sorted by ballot styles and the mailing envelopes may be opened and the secrecy envelopes mixed separately for each ballot style. The votes on vote-by-mail ballots shall be included in the total vote of the county.

(3) The supervisor or the chair of the county canvassing board shall, after the board convenes, have custody of the vote-by-mail ballots until a final proclamation is made as to the total vote received by each candidate.

(4)(a) As soon as practicable, the supervisor shall, on behalf of the county canvassing board, attempt to notify an elector who has returned a vote-by-mail ballot that does not include the elector's signature or contains a signature that does not match the elector's signature in the registration books or precinct register by:

1. Notifying the elector of the signature deficiency by e-mail and directing the elector to the cure affidavit and instructions on the supervisor's website;
2. Notifying the elector of the signature deficiency by text message and directing the elector to the cure affidavit and instructions on the supervisor's website; or
3. Notifying the elector of the signature deficiency by telephone and directing the elector to the cure affidavit and instructions on the supervisor's website.

In addition to the notification required under subparagraph 1., subparagraph 2., or subparagraph 3., the supervisor must notify the elector of the signature deficiency by first-class mail and direct the elector to the cure affidavit and instructions on the supervisor's website. Beginning the day before the election, the supervisor is not required to provide notice of the signature deficiency by first-class mail, but shall continue to provide notice as required under subparagraph 1., subparagraph 2., or subparagraph 3.

(b) The supervisor shall allow such an elector to complete and submit an affidavit in order to cure the vote-by-mail ballot until 5 p.m. on the 2nd day after the election.

(c) The elector must complete a cure affidavit in substantially the following form:

VOTE-BY-MAIL BALLOT CURE AFFIDAVIT

I, , am a qualified voter in this election and registered voter of County, Florida. I do solemnly swear or affirm that I requested and returned the vote-by-mail ballot and that I have not and will not return more than one ballot in this election. I understand that if I commit or attempt any fraud in connection with voting, vote a fraudulent ballot, or vote more than once in an election, I may be convicted of a felony of the third degree and fined up to \$5,000 and imprisoned for up to 5 years. I understand that my failure to sign this affidavit means that my vote-by-mail ballot will be invalidated.

(Voter's Signature)

(Address)

(d) Instructions must accompany the cure affidavit in substantially the following form:

READ THESE INSTRUCTIONS CAREFULLY BEFORE COMPLETING THE AFFIDAVIT. FAILURE TO FOLLOW THESE INSTRUCTIONS MAY CAUSE YOUR BALLOT NOT TO COUNT.

1. In order to ensure that your vote-by-mail ballot will be counted, your affidavit should be completed and returned as soon as possible so that it can reach the supervisor of elections of the county in which your precinct is located no later than 5 p.m. on the 2nd day after the election.

2. You must sign your name on the line above (Voter's Signature).

3. You must make a copy of one of the following forms of identification:

a. Tier 1 identification.—Current and valid identification that includes your name and photograph: Florida driver license; Florida identification card issued by the Department of Highway Safety and Motor Vehicles; United States passport; debit or credit card; military identification; student identification; retirement center identification; neighborhood association identification; public assistance identification; veteran health identification card issued by the United States Department of Veterans Affairs; a Florida license to carry a concealed weapon or firearm; or an employee identification card issued by any branch, department, agency, or entity of the Federal Government, the state, a county, or a municipality; or

b. Tier 2 identification.—ONLY IF YOU DO NOT HAVE A TIER 1 FORM OF IDENTIFICATION, identification that shows your name and current residence address: current utility bill, bank statement, government check, paycheck, or government document (excluding voter information card).

4. Place the envelope bearing the affidavit into a mailing envelope addressed to the supervisor. Insert a copy of your identification in the mailing envelope. Mail (if time permits), deliver, or have delivered the completed affidavit along with the copy of your identification to your county supervisor of elections. Be sure there is sufficient postage if mailed and that the supervisor's address is correct. Remember, your information MUST reach your county supervisor of elections no later than 5 p.m. on the 2nd day after the election, or your ballot will not count.

5. Alternatively, you may fax or e-mail your completed affidavit and a copy of your identification to the supervisor of elections. If e-mailing, please provide these documents as attachments.

(e) The department and each supervisor shall include the affidavit and instructions on their respective websites. The supervisor must include his or her office's mailing address, e-mail address, and fax number on the page containing the affidavit instructions, and the department's instruction page must include the office mailing addresses, e-mail addresses, and fax numbers of all supervisors of elections or provide a conspicuous link to such addresses.

(f) The supervisor shall attach each affidavit received to the appropriate vote-by-mail ballot mailing envelope.

(g) If a vote-by-mail ballot is validated following the submission of a cure affidavit, the supervisor shall make a copy of the affidavit, affix it to a voter registration application, and immediately process it as a valid request for a signature update pursuant to s. 98.077.

(h) After all election results on the ballot have been certified, the supervisor shall, on behalf of the county canvassing board, notify each elector whose ballot has been rejected as illegal and provide the specific reason the ballot was rejected. In addition, unless processed as a signature update pursuant to paragraph (g), the supervisor shall mail a voter registration application to the elector to be completed indicating the elector's current signature if the signature on the voter's certificate or cure affidavit did not match the elector's signature in the registration books or precinct register.

RESULTS:

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DATA

Hillsborough County:

See Exhibits

Total registration voters in 2022 - 908,954

Votes cast were 229,064

The voters have increased in 2024

But the total registered voters in 2024 shows a drop to 830,266 .

This is disappearing of 78,688 votes plus the number of new registered voters.

Only 162,112 votes were cast

That is 66,952 votes less even though the population has increased and the numbers of registered Republicans voters has increased.

On the Election Day hillsborough county reported that the machines were not working properly but the results were deceptively declared, also by duplicating.

SEE EXHIBITS of case Pinellas County Gleason v. Marcus. 24-3717-CI

The numbers don't add up to the people who voted

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and the mail in ballots are more than the people who voted in person where the voters are close to a million.

COUNT II

Plaintiff repeats all facts narrated in other counts

Misconduct by the defendants

The defendants individually and collectively conspired against the Plaintiff to unfairly win the election.

The defendants slandered the plaintiff and then further abused their position to falsely fabricate votes, numbers, forms and documents and forge signatures. See Affidavits

MISCONDUCT OF DEFENDANTS

The defendants conspired against the plaintiff to unfairly influence the outcome of the election in August 20,2024.

The voters and the ballots disappeared. There's 8000 less voters that voted in the primary even though the population increased. The candidates had their own personal in the canvassing board. Mail-in ballots with forged signatures were created for the corrupt candidates. Ballots for the Plaintiff were discarded, changed or replaced with a duplicate ballot.

Amanda Coffey present as Pinellas County attorney has an adversarial relationship with the Plaintiff and should have recused herself from the canvassing Board in order for the fair process of determining who votes. She is in violation of F.S102.168(d) .

COUNT III
CONSPIRACY

Plaintiff repeats all facts narrated in all other counts

The Defendants individually, collectively or through known or unknown corporations or third parties conspired with government officials to unfairly influence the outcome of the election. Thus violating F.S. 102.168(c)

COUNT IV
CORRUPTION

Plaintiff repeats all facts, allegations and arguments in all other counts

The **Racketeer Influenced and Corrupt Organizations (RICO) Act** is a United States federal law that provides for extended criminal penalties and a civil cause of action for acts performed as part of an ongoing criminal organization.

RICO was enacted by Title IX of the Organized Crime Control Act of 1970 (Pub. L. Tooltip Public Law (United States) 91-452, 84 Stat. 922, enacted October 15, 1970),

This article primarily covers the federal criminal statute, but since 1972, 33 U.S. states and territories have adopted state RICO laws, which although similar, cover additional state crimes and may differ from the federal law and each other in several citizens to the honest services of their elected local officials" (see indictment).^[60]

1. . *United States Department of Justice*. May 27, 2015. Archived from the original on May 27, 2015. Retrieved May 27, 2015.
2. ^ Jr, James C. Mckinley (August 15, 2023), "Trump and Allies in Georgia Face RICO Charges. Here's What That Means.", *The New York Times*, retrieved August 15, 2023
3. ^ Carlson, K (1993). "Prosecuting Criminal Enterprises". *National Criminal Justice Reference Series. United States: Bureau of Justice Statistics Special Report: 12*. Archived from the original on September 11, 2007. Retrieved December 28, 2009.
4. ^ LII U.S. Code Title 18. CRIMES AND CRIMINAL PROCEDURE Part I. CRIMES Chapter 96. RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS Section 1964. Civil remedies Archived August 29, 2018, at the Wayback Machine 18 U.S. Code § 1964. Civil remedies
5. ^ "Racketeer Influenced and Corrupt Organizations (RICO) Law". April 25, 2018. Archived from the original on September 14, 2018. Retrieved September 13, 2018.

Bagchi, Aysha. Bloomberg Tax. "Participants in IRS-Targeted Land Deals Sue Alleged Promot

Further reading[[edit](#)]

- *Criminal RICO: 18 U.S.C. 1961-1968: A Manual for Federal Prosecutors*. Washington, D.C.: U.S. Dept. of Justice, Criminal Division, Organized Crime and Racketeering Section, [2009].

- United States. Congress. House. Committee on the Judiciary. Subcommittee No. 5. *Organized Crime Control. Hearings ... Ninety-first Congress, Second Sess* [REDACTED] *S.30, and Related Proposals, Relating to the Control of Organized Crime in the U.S. [held] May 20, 21, 27; June 10, 11, 17; July 23, and August*

Racketeer Influenced and Corrupt Organizations Act

United States federal public corruption crime

Acts related to organized crime

The Hillsborough county declared machines were not working. (See Exhibit)

RICO

101.5614 Canvass of returns.—

(1) As soon as the polls are closed, the election board shall secure the voting devices against further voting. The election board shall thereafter, in the presence of members of the public desiring to witness the proceedings, verify the number of voted ballots, unused ballots, provisional ballots, and spoiled ballots to ascertain whether such number corresponds with the number of ballots issued by the supervisor. If there is a difference, this fact shall be reported in writing to the county canvassing board with the reasons therefor if known. The total number of voted ballots shall be entered on the forms provided. The proceedings of the election board at the precinct after the polls have closed shall be open to the public; however, no person except a member of the election board shall touch any ballot or ballot container or interfere with or obstruct the orderly count of the ballots.

(2) The results of ballots tabulated at precinct locations may be transmitted to the main computer system for the purpose of compilation of complete returns. The security guidelines for transmission of returns shall conform to rules adopted by the Department of State pursuant to s. 101.015.

(3) For each ballot or ballot image on which write-in votes have been cast, the canvassing board shall compare the write-in votes with the votes cast on the ballot; if the total number of votes for any office exceeds the number allowed by law, such votes shall not be counted. All valid votes shall be tallied by the canvassing board.

(4)(a) If any vote-by-mail ballot is physically damaged so that it cannot properly be counted by the voting system's automatic tabulating equipment, a true duplicate copy shall be made of the damaged ballot in an open and accessible room in the presence of witnesses and substituted for the damaged ballot. Likewise, a duplicate ballot shall be made of a vote-by-mail ballot containing an overvoted race if there is a clear indication on the ballot that the voter has made a definite choice in the overvoted race or ballot measure. A duplicate shall include all valid votes as determined by the canvassing board based on rules adopted by the division pursuant to s. 102.166(4). A duplicate may be made of a ballot containing an undervoted race or ballot measure if there is a clear indication on the ballot that the voter has made a definite choice in the undervoted race or ballot measure. A duplicate may not include a vote if the voter's intent in such race or on such measure is not clear. Upon request, a physically present candidate, a political party official, a political committee official, or an authorized designee thereof, must be allowed to observe the duplication of ballots upon

signing an affidavit affirming his or her acknowledgment that disclosure of election results discerned from observing the ballot duplication process while the election is ongoing is a felony, as provided under subsection (8). The observer must be allowed to observe the duplication of ballots in such a way that the observer is able to see the markings on each ballot and the duplication taking place. All duplicate ballots must be clearly labeled "duplicate," bear a serial number which shall be recorded on the defective ballot, and be counted in lieu of the defective ballot. The duplication of ballots must happen in the presence of at least one canvassing board member. After a ballot has been duplicated, the defective ballot shall be placed in an envelope provided for that purpose, and the duplicate ballot shall be tallied with the other ballots for that precinct. If any observer makes a reasonable objection to a duplicate of a ballot, the ballot must be presented to the canvassing board for a determination of the validity of the duplicate. The canvassing board must document the serial number of the ballot in the canvassing board's minutes. The canvassing board must decide whether the duplication is valid. If the duplicate ballot is determined to be valid, the duplicate ballot must be counted. If the duplicate ballot is determined to be invalid, the duplicate ballot must be rejected and a proper duplicate ballot must be made and counted in lieu of the original.

(b) A true duplicate copy shall be made of each federal write-in absentee ballot in the presence of witnesses and substituted for the federal write-in absentee ballot. The duplicate ballot must include all valid votes as determined by the canvassing board based on rules adopted by the division pursuant to s. 102.166(4). All duplicate ballots shall be clearly labeled "duplicate," bear a serial number that shall be recorded on the federal write-in absentee ballot, and be counted in lieu of the federal write-in absentee ballot. After a ballot has been duplicated, the federal write-in absentee ballot shall be placed in an envelope provided for that purpose, and the duplicate ballot shall be tallied with other ballots for that precinct.

(5) If there is no clear indication on the ballot that the voter has made a definite choice for an office or ballot measure, the elector's ballot shall not be counted for that office or measure, but the ballot shall not be invalidated as to those names or measures which are properly marked.

(6) Vote-by-mail ballots may be counted by the voting system's automatic tabulating equipment if they have been marked in a manner which will enable them to be properly counted by such equipment.

(7) The return printed by the voting system's automatic tabulating equipment, to which has been added the return of write-in, vote-by-mail, and manually counted votes and votes from provisional ballots, shall constitute the official return of the election upon certification by the canvassing board. Upon completion of the count, the returns shall be open to the public. A copy of the returns may be posted at the central counting place or at the office of the supervisor of elections in lieu of the posting of returns at individual precincts.

(8) Any supervisor of elections, deputy supervisor of elections, canvassing board member, election board member, election employee, or other person authorized to observe, review, or inspect ballot materials or observe canvassing who releases any information about votes cast for or against any candidate or ballot measure or any results of any election before the closing of the polls in that county on election day commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

History.—s. 14, ch. 73-156; s. 1, ch. 77-174; s. 21, ch. 77-175; s. 14, ch. 81-105; s. 17, ch. 84-302; s. 1, ch. 85-17; s. 5, ch. 86-200; s. 17, ch. 90-315; s. 1, ch. 94-208; ss. 22, 37, ch. 2001-

40; ss. 14, 15, ch. 2002-17; s. 38, ch. 2005-277; s. 35, ch. 2011-40; s. 2, ch. 2011-162; s. 12, ch. 2016-37; s. 2, ch. 2018-112; s. 14, ch. 2019-162; s. 3, ch. 2020-109; s. 20, ch. 2021-11; s. 18, ch. 2022-73.

COUNT V:

CONFLICT OF INTEREST:

F.S. 605.04092

'Conflict of Interest can be defined as a Personal Interest or relationship that interferes with the performance of official duty' Also see F. S. 112.311

Plaintiff repeats all data, facts , evidence and, statements in all other counts.

The election was unfairly tainted by the abuse of public officials to allow the candidates to have their campaign officers be present and allow invalid votes to be counted and duplicate votes without proper monitoring. To allow forged signatures and abuse power to change the outcome of the primary election. Wherefore, the election be nullified and candidates Roberth 'Rocky' Rochford, James Peters and Ehsaan Joarder be banned from running again.

CONCLUSION :

The Process Of Fraud:

The fraud was committed in several ways:

1. The Electronic Vote:

This was a pre-meditated fraud. The Supervisor of Elections was aware that the email ballots can't be fed into the machines.. However they still sent 152,000.ballots to the voters some of which were returned electronically. Their signatures were checked online with other companies. (As per Stacy at the Public viewing). Who is know thatThen their signatures were copied and pasted on the ballot?

After these ballots were printed, they were printed on the regular printer paper. A large number are blank. ("large numbers of mail-in ballots are blank" as per Chris Lattimer" See Exhibit). These papers cannot be fed to the tabulation machines so they were labeled defective and duplicated when they could be altered The Supervisor of elections knew of this issues and knowingly and intentionally did not do anything about it so as to use the process for fraud. This abuse of power should be stopped. All my opponents conspired and participated in this fraud as suggested by the anomalies in the numbers and corruption in canvassing board. (See Exhibit)

2. The Mail-in Ballots

The voters that did not request a mail- in ballot were sent ballots. Who is to know who cast their ballot. In the prior election my vote was cast by a mail in ballot that I never received. I couldn't understand why and how. But now I understand that it wasn't just an incident by accident.

This is fraud process of submitting mail in ballot ballots by forged signatures and now we als have AI to do this.

(See Affidavits)

3. In person ballot

The number of registered voters are less even though the prior numbers were higher. 8000 Les voters voted for . US Congress Republican candidates as compared to 2022.

129,000 voters voted for Julie Marcus and 24,000 people voted for Chris Gleason and only 68, 000 people bothered to vote for the senator suggesting paid voters (see affidavits exhibit.

The canvassing board reviewed ballots before tabulating them. They removed, rejected or destroyed ballots of the Plaintiff.

I heard one such conversation in person.

As it was the government that I was relying upon to protect my rights was, wasn't. It fell like dictatorship. My opponents, Rochford, Peters and Joarder have proven to be corrupt and fraud through this election fraud by conspiracy and bribery constituting misconduct.

Why should this court allow such candidates to run for office. The people deserve justice. They don't know and are being manipulated by fraud and corruption. Hence, it is this court's duty to ban Rochford, Peters and Joarder from running for office of US House of Representatives, District 14, FL.

Further Rochford lives in Thonotosassa, which is East Hillsborough, Peters lives in Lakeland in Polk County and Ehsan lives in Odessa which is Pasco county and are ruining just to block me by deception.

Rochford campaigned with a 30 year old picture and the voters thought he was young and energetic person. This is deception for the People.(See Exhibit)

Hence the plaintiff Dr. Neelam Taneja Perry be nominated as the Republican Nominee for the office of the United States House of Representatives, District 14, FL, by default.

Wherefore, the Plaintiff has proven fraud process in the in person vote, the mail-in ballots, electronic ballots, ballot duplication, canvassing board's irregularities to the highest extent such to be enough to set aside the results of US House of Representatives, Republican Primary election results and nullify the election.A fair election is the right of the people and the foundation of democracy. Robert 'Rocky' Rochford, James Peters and Ehsan Joarder have abused the power of the government officials and have won over the plaintiff by unfair means, fraud, corruption conspiracy, misconduct and lies and therefore should be banned from running in this race again or hold a government public office. As the People of United States of America deserve Honest Elections, Leadership and Government. Thus, the Plaintiff Dr. Neelam Taneja Perry be nominated as the Republican Nominee for Florida District 14.

2. Restraining and Enjoining the Supervisor of elections from certifying the election results.

3. Restraining and enjoining the any and all Republican Parties including but not limited to, Republican Party of Hillsborough County, Pinellas County, Republican National Committee against Nominating Robert 'Rocky' Rochford, John Paters, and Ehsan Joarder as the Republican Nominee for the House of Representatives, District 14, FL.

4. Nominate Dr. Neelam Taneja Perry to be the Republican Nominee for the United States House of Representatives, District 14., Tampa, St. Petersburg, by default.

Respectfully Submitted,

Dr. Neelam Taneja Perry

Neelam Taneja Perry

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Certificate of service:

I hereby certify that the copy of this document has been served to the defendants via mail, certified mail, process server or email to

Robert 'Rocky' Rochford, 9712 Monaghan Street, Thonotosassa, FL33592,

Rocky@rocky4congress.com

John Peters, PO Box 6934, Lakeland, FL-33807

Ehsan Joarder, 2238 Passion Flower way, # 202, Odessa, FL, 33556

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33756

Julie Marcus, Supervisor of Elections, 13001 Starkey road, Largo, FL-33771

N. Taneja Perry