

**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

















