

In the Circuit Court of the Sixth Judicial Circuit

In and for Pinellas County, Florida

CIVIL DIVISION

Case Number: 24-003892CI

Neelam Taneja Perry a/k/a

Neelam Taneja

Plaintiff

Vs

Robert' Rocky' Rochford

James Peters

Ehsan Joarder

Julie Marcus,

Amanda Coffey

Defendant(s)

OBJECTION TO MOTION TO STRIKE

Comes Now, Plaintiff, Neelam Taneja Perry, candidate for US House of

Representatives, Florida, District 14 files a complaint to **OBJECTION TO**

MOTION TO STRIKE, and states grounds as follows:

1. The Defendant Julie Marcus and Amanda Coffey filed Motion to Strike during the hearing on September 9, 2024 at 2 p.m.

2. They presented an order which was overruled by filing A writ of Certiorari, which was then settled by an Agreed order of Release (Exhibit A) and was ratified by the lower court and then the writ was withdrawn as moot.
3. The Pinellas County docket (Exhibit B) shows that the order was overruled by the second DCA by the 'Agreed order of release. (Exhibit A).
4. However, the attorney for the Government officials, who have a responsibility to protect the public against deception, deliberately ignored the evidence to misrepresent the orders to mislead and manipulate this court in order to circumvent this complaint with the Evidence of Election Fraud that needs to be considered by your Honor.
5. This dishonest and disturbing misrepresentation is misconduct and fraud in court against the plaintiff and the citizens of district 14. These defendants have proven to the court that they are not ethical and they do not have any reservations, whatsoever, with allowing and condoning a fraudulent election..
6. Pursuant to F.S. 120.168 the defendants had 10 days to respond to the complaint.
7. Robert' Rocky' Rochford, Mr. John Peters and Ehsan Joarder chose not to file any objection and the last two were in contempt of your honor's order by failing to appear before you on September 9, 2024

8. Wherefore, there is 'No Objection' to Dr. Neelam Taneja Perry's complaint and admission to and acceptance to the ban from the race, by Robert 'Rocky' Rochford, John Peters, Ehsan Joarder pursuant to the complaint.

9. Ms. Julie Marcus, who is the Supervisor of Elections and Ms. Amanda Coffey, who is the Pinellas County attorney are the gatekeepers of the election laws. They intentionally and deliberately did not file any objection to the complaint pursuant to the Florida statute.

10. As per a witness "Exhibit C"

11. Attached is a PDF document of every single Pinellas county voter who Ms. Marcus and her co-conspirators illegally requested vote by mail ballots on Sunday June 23, 2024.

12. Every single one of these vote by mail ballot requests were made illegally.

13. The attachment represents over 89.90% of all the vote by mail ballots sent out.

14. This is a massive fraud, and massive NON-COMPLIANCE with Florida Statute 101.62.

15. Florida law and Florida Courts have long ruled that Vote by mail is a privilege and not a right, therefore the law related to vote by mail ballots SHALL BE STRICTLY COMPLIED WITH...

16. No strict compliance and even a slight presence of fraud renders every single vote by mail ballot ordered on that day illegally requested be deemed invalid.

17. There were massive numbers of undeliverable Vote by mail ballots that were sent out and then returned as being cast.

19. All Voters list maintenance and the handling of this activity is managed in VR Systems.

20. https://web.archive.org/web/20220923030947/https://content.vrsys.co/help/vf/Content/Vote_by_Mail/How_to_Process_an_Underliverable_Vote-by-Mail_Ballot.htm

21. This means that because >89% of the VBM Ballots were requested illegally,
there is no other explanation other than for fraud...

22. All the VBM ballots illegally requested and ALL of those that should have come back as
undeliverable BUT were instead cast and counted are 100% ILLEGAL and SHOULD BE VOIDED
according to long standing Florida Supreme Court Rulings.

23. VR Systems has a log of the illegally requested VBM Ballots”.

24. Fla. Stat. § 102.168 (“(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

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inform the defendant of the particular proceeding or cause for which the nomination or election is contested.”) The response that these defendants filed was late The had 10 days to file, so this is not consistent with the law It was filed on the 12th day. This delay in filing a response is not permitted, see 25. Wherefore, an emergency injunction against certification of the results of the Republican Primary Election held on August 20, 2024 be annulled and declaring Mr. Robert ‘ Rocky’ Rochford, who won by cheating, disqualified and banned from running in the race, James Peters and Ehsan Joarder as abandoning the race and accepting the ban failing to show up for the court- ordered hearing.

The Plaintiff, Neelam Taneja Perry, is the only viable candidate left.

Hence, Dr. Neelam Taneja Perry be declared the nominee of the

Republican Party to be the candidate for US House of Representatives,

Florida, District 14.

Respectfully Submitted,

N. Taneja
Neelam Taneja Perry

2850 34th St. N., #1

St. Petersburg, FL-33713

727-403-0022

Nneelu123@aol.com

(5)

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

info@joarderforcingress.com

Amanda Coffey , Pinellas County Attorney, 315 Court Street, Clearwater, FL. - 33756

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

M. Perry

(8)

Exhibit 'A'

COUNTY COURT, PINELLAS COUNTY, FLORIDA
SMALL CLAIMS DIVISION

CHARLENE RODRIGUEZ,
Plaintiff,

vs.

CASE NO. 10-4509-SC-SPC

DR. NEELAM UPPAL,
Defendant.


AGREED ORDER TO APPROVE MUTUAL RELEASE

This action was heard upon Plaintiff's Motion for Approval of Release, and the Court being fully informed in the premises, it is

ORDERED AND ADJUDGED as follows:

1. The Plaintiff's Motion for Approval of Release shall be and hereby is granted.
2. The MUTUAL RELEASE AND SETTLEMENT AGREEMENT executed by the parties shall be and hereby is ratified and approved by the Court.

ORDERED AND ADJUDGED in Chambers in St. Petersburg, Pinellas County, Florida, on November 26 2019, 2019.


10-004509-SC 11/26/2019 12:18:00 PM
County Judge Lorraine M. Key
10-004509-SC 11/26/2019 12:18:00 PM

County Court Judge

xc: G. Barry Wilkinson, Esq.
Jay. M. Romano, Esq.
Miguel M. Cordano, Esq.
John D. Bernstein, Esq.
George F. Indest, III, Esq.

Marie Tomassi, Esq.
Mary J. Walter, Esq.

W:\R\Rodriguez\Tenant v Landlord\Pleadings\2019.11.25 Order to Approve Mutual Release.wpd

⑦

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT, POST OFFICE BOX 327, LAKELAND, FL 33802-0327

November 25, 2019

CASE NO.: 2D19-2384
L.T. No.: 10-004509-SC-45,
18-000022-AP-88B

NEELAM T. UPPAL

v. CHARLENE RODRIGUEZ

Appellant / Petitioner(s),

Appellee / Respondent(s).

BY ORDER OF THE COURT:

The respondent has filed a copy of the parties' notice of mutual release with the apparent expectation that the court will keep the filing confidential, although the respondent did not accompany the filing with a notice of confidential information within court filing or a motion to determine confidentiality of court records styled in this court.

The court will maintain the filing as confidential for 10 days from the date of this order, after which the court will remove the confidential designation unless a party files, within 10 days, a notice of confidential information within court filing or a motion to determine confidentiality of court records. The court notes the notice of confidential information within court filing styled in the county court that accompanies the respondent's filing. The court further notes that there does not appear to be a line item in Florida Rule of Judicial Administration 2.420(d)(1)(B), cited in the notice, that applies to the document at issue.

I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

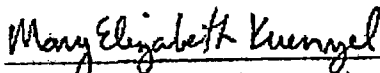
Served:

G. Barry Wilkinson, Esq.
Miguel M. Cordano, Esq.
Neelam T. Uppal

Mary J. Walter, Esq.
John D. Bernstein, Esq.
Ken Burke, Clerk

George Wilkinson, Esq.
Counsel For Bank Of
America, N. A.

ks


Mary Elizabeth Kuenzel
Clerk



KEN BURKE
CLERK OF CIRCUIT COURT

2019 NOV 25 PM 2:52

FILED
CIVIL COURT REC. DEPT.

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT, POST OFFICE BOX 327, LAKELAND, FL 33802-0327

November 21, 2019

CASE NO.: 2D19-2384
L.T. No.: 10-004509-SC-45,
18-000022-AP-88B

NEELAM T. UPPAL

v. CHARLENE RODRIGUEZ

Appellant / Petitioner(s),

Appellee / Respondent(s).

BY ORDER OF THE COURT:

The appellant's motion to abate is granted only to the extent that the appellant shall respond as directed in this court's November 20, 2019, order.

I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

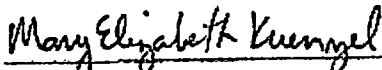
Served:

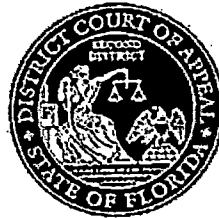
G. Barry Wilkinson, Esq.
Miguel M. Cordano, Esq.
Neelam T. Uppal

Mary J. Walter, Esq.
John D. Bernstein, Esq.
Ken Burke, Clerk .

George Wilkinson, Esq.
Counsel For Bank of
America, N. A.

td


Mary Elizabeth Kuenzel
Clerk



KEN BURKE
CLERK OF CIRCUIT COURT

2018 NOV 21 PM 3:01

FILED
CIVIL COURT REC. DEPT.

MEMORANDUM OF DECISION BY THE COURT

10/29/2020 **SATISFACTION OF JUDGMENT (R)** Doc # 181
OF ATTY'S FEES
Vol./Book 21244, Page 2130, 3 pages

10/29/2020 **SATISFACTION OF JUDGMENT (R)** Doc # 182
FOR ATTY'S FEES AND COSTS
Vol./Book 21244, Page 2135, 3 pages

10/29/2020 **SATISFACTION OF JUDGMENT (R)** Doc # 183
IN GARNISHMENT
Vol./Book 21244, Page 2174, 3 pages

10/29/2020 **SATISFACTION OF JUDGMENT (R)** Doc # 184
OF PARTIAL FINAL JUDGMENT IN GARNISHMENT ON 010913 WRIT OF
GARNISHMENT
Vol./Book 21244, Page 2209, 3 pages

10/29/2020 **SATISFACTION OF JUDGMENT** Doc # 185
FOR SANCTIONS FEES AND COSTS

10/29/2020 **SATISFACTION OF JUDGMENT** Doc # 186
OF OPINION AND ORDER FOR SANCTIONS

10/08/2020 **DCA ORDER** Doc # 180
APPELLANT'S NOTICE OF REMOVE MOTION IS TREATED AS MOTION TO
WITHDRAW MOTION AND IS GRANTED/MOTION FOR RECONSIDERATION IS
DISMISSED/2D19-2384

09/30/2020 **DCA ORDER** Doc # 179
PETITIONER'S MOTION FOR RECONSIDERATION, CAPTIONED WITH CASE
NUMBER 2D19-2384 BUT FILED UNDER CASE NUMBER 2D20-1932, IS HEREBY
DOCKETED IN CASE 2D19-2384

05/23/2020 **NOTICE OF WITHDRAWAL** Doc # 178
OF SUBPOENA

05/21/2020 **NOTICE** Doc # 175
WITHDRAW SUBPOENA

05/20/2020 **CASE REOPENED**
WITHDRAWN

05/20/2020 **MOTION** Doc # 177
BY A NON PARTY TO CASE TO QUASH DEFENDANT'S SUBPOENA FOR
PRODUCTION OF DOCUMENTS FROM NON-PARTY, OR IN THE ALTERNATIVE,
MOTION FOR PROTECTIVE ORDER IN RESPONSE TO DEFENDANT'S
SUBPOENA FOR PRODUCTION OR MOTION FOR PROTECTIVE ORDER
W/ATTACHMENTS

12/02/2019 **DCA ORDER** Doc # 174
PETITIONER'S STIPULATION OF SETTLEMENT AND DISMISSAL IS TREATED AS
A NOTICE OF VOLUNTARY DISMISSAL, WHICH THE COURT ACCEPTS.
PETITION FOR WRIT OF CERTIORARI 2D19-2384 IS DISMISSED. PETITIONER'S
MOTION FOR RECONSIDERATION IS DENIED

11/27/2019 **NOTICE OF CANCELLATION** Doc # 172
OF HEARING 010820

11/28/2019 **AGREED ORDER** Doc # 171
TO APPROVE MUTUAL RELEASE

11/25/2019 **DCA ORDER** Doc # 173
PARTIES' NOTICE OF MUTUAL RELEASE WILL BE CONFIDENTIAL FOR 10 DAYS
AFTER WHICH THE COURT WILL REMOVE THE CONFIDENTIAL DESIGNATION
UNLESS A PARTY FILES A NOTICE OF CONFIDENTIAL INFORMATION WITHIN
COURT FILING OR A MOTION TO DETERMINE CONFIDENTIALITY OF COURT
RECORDS

11/21/2019 **DCA ORDER** Doc # 167
GRANTING APPELLANT'S MOTION TO ABATE ONLY TO THE EXTENT THAT THE
APPELLANT SHALL RESPOND AS DIRECTED IN THIS COURT'S NOVEMBER 20,
2019 ORDER

11/21/2019 **CLERK DENIAL OF CONFIDENTIAL INFORMATION** Doc # 168
REQUESTED INFORMATION NOT COVERED W/O MOTN TO DETERMINE

11/21/2019 **NOTICE OF HEARING** Doc # 169
010820 2:30

11/20/2019 **DCA ORDER** Doc # 166
PETITIONER SHALL FILE A STATEMENT ON THE STATUS OF THE SETTLEMENT
BY 11/30/19

11/18/2019 **PLTF-PET'S MOTION** Doc # 163
FOR APPROVAL OF RELEASE

11/18/2019 **EXHIBIT** Doc # 164
A - MUTUAL RELEASE/SETTLEMENT AGREEMENT

11/18/2019 **NOTICE OF CONFIDENTIAL INFORMATION WITHIN COURT FILE** Doc # 165

11/18/2019 **CASE REOPENED** Doc # 170

11/11/2019 **STIPULATION** Doc # 162
FOR CANCELLATION OF HEARING

11/05/2019 **DCA ORDER** Doc # 160
DENYING APPELLANT'S MOTION FOR STAY

11/05/2019 **COURT WORKSHEET** Doc # 161

11/01/2019 **DCA ORDER** Doc # 159
RESPONDENT SHALL RESPOND TO PETITIONER'S MOTION FOR STAY BY
11/12/19

10/31/2019 **AFFIDAVIT OF ATTORNEY FEES** Doc # 153
AND COSTS ON APPEAL OF GARNISHMENT JUDGMENTS (AMENDED)

Exhibit B

Exhibit C

1429	354	8/31/2018 3:05 PM	502747549	ADAMS, BEV P	192 163 115 59
1432	355	10/3/2018 1:02 PM	502745179	CAMERON, DAVID S	192 163 115 62
1438	AI	11/20/2018 10:28 AM	502402015	PARKER, JOHN A	127 0 0 1
1440	AI	11/20/2018 12:54 PM	502747593	SHELL, SHELBY G	127 0 0 1
1441	351	11/20/2018 2:03 PM	502747512	HALE, GINA	127 0 0 1
1442	353	11/22/2018 3:05 PM	502747512	HALE, GINA	127 0 0 1
1443	355	11/22/2018 2:16 PM	502754283	Hill, Jimmy	127 0 0 1
1445	AI	11/22/2018 2:23 PM	502754591	HILL, JIMMY B	127 0 0 1
1446	355	11/22/2018 2:24 PM	502754344	HAMILTON, CYNTHIA	127 0 0 1
1453	370	4/9/2019 4:07 PM	502754221	Alex, Nick	192 163 115 37
1455	352	5/28/2019 5:00 PM	502747512	HALE, GINA	127 0 0 1
1457	393	7/1/2019 6:23 AM	502747512	HALE, GINA	127 0 0 1
1459	AI	11/05/2019 4:25 PM	502754223	Danger, Rodney	127 0 0 1
1459	AI	1/6/2020 9:43 AM	502300069	Da, Dana	127 0 0 1
1460	396	1/6/2020 9:43 AM	502300069	Da, Dana	127 0 0 1
1461	AI	1/13/2020 10:17 AM	502300073	Curry, Wardell S	192 163 115 42
1464	517	2/11/2020 12:19 PM	502754283	Hill, Jimmy	127 0 0 1
1466	AI	1/20/2020 12:47 AM	502754213	Foster, Russ F	127 0 0 1
1469	329	4/22/2020 5:43 AM	502745570	Wilson, Amanda T	127 0 0 1
1472	343	4/27/2020 12:44 PM	502754161	DALE, SUE	127 0 0 1
1473	342	4/28/2020 3:54 PM	502747719	JAMES, BULLOCK	127 0 0 1
1476	343	5/20/2020 11:19 AM	502750000	Da, Bly	127 0 0 1

Max: 500 263 records shown out of Total Requests: 263

Single and AI Elections
 AI Elections
 Single Election

VR Systems Voter Focus

Show trimmed content

How to Process an Undeliverable Vote-By-Ma...

How to Process Undeliverable Mail and Third-...