

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA  
CIVIL DIVISION

NEELAM TANEJA PERRY a/k/a  
NEELAM TANEJA,

Plaintiff,

v.

CASE NO.: 24-003892-CI

ROBERT ROCHFORD, et. al.,

Defendant.

\_\_\_\_\_ /

**DEFENDANT AMANDA COFFEY'S ANSWER AND  
DEFENSES TO PLAINTIFF'S COMPLAINT**

COMES NOW, through undersigned counsel, AMANDA COFFEY in her official capacity as Managing Assistant County Attorney with the Pinellas County Attorney's Office, and files this Answer and Defenses in response to Plaintiff's Emergency Injunction and Complaint to Contest to Primary Election Results of August 20, 2024 Based on Misconduct, Fraud, Corruption dated August 29, 2024.

**ANSWER**

PARTIES:

1. **Admitted that Robert "Rocky" Rochford was a candidate in the republican primary election held on August 20, 2024, for Representative in U.S. Congress, District 14. Otherwise, denied.**
2. **Admitted that James Peters was a candidate in the republican primary election held on August 20, 2024, for Representative in U.S. Congress, District 14. Otherwise, denied.**

3. **Admitted that Ehsan Joarder was a candidate in the republican primary election held on August 20, 2024, for Representative in U.S. Congress, District 14. Otherwise, denied.**
4. **Admitted that Amanda Coffey is a Managing Assistant County Attorney with the Pinellas County Attorney's office. Otherwise, denied.**
5. **Admitted.**

#### INTRODUCTION:

Election Integrity is the key to success in Democracy.

#### STATEMENT OF FACTS

1. **Admitted that Plaintiff was a candidate in the republican primary election held on August 20, 2024, for Representative in U.S. Congress, District 14. Otherwise, without knowledge and therefore denied.**
2. **Without knowledge and therefore denied.**
3. **Denied that ballots requiring duplication were not processed in accordance with law. Denied that the ballot opening, and signature verification processes were not completed in accordance with law. Otherwise, without knowledge and therefore denied.**
  - **“All the invalid votes were being duplicated.” – Denied.**
  - 1) **Without knowledge and therefore denied.**
  - 2) **Denied.**
  - 3) **Denied that Amanda Coffey has adversarial position with plaintiff outside of the present lawsuit. Denied that Amanda Coffey supported candidate Rochford. Otherwise without knowledge and therefore denied.**

- 4) **Without knowledge and therefore denied.**
- 5) **Without knowledge and therefore denied.**
- 6) **Without knowledge and therefore denied.**
- 7) **Denied that Amanda Coffey is a member of the Canvassing Board. Denied that ballots were “assigned” to candidates. Otherwise, without knowledge and therefore denied.**
  - “On public view the pictures show Ms. Kathleen Peters reading the ballot before tabulating.” – **Without knowledge and therefore denied.**
- 8) **Without knowledge and therefore denied.**
- 9) **Without knowledge and therefore denied.**
- 10) **Without knowledge and therefore denied.**
- 11) **Without knowledge and therefore denied.**
- 12) **Without knowledge and therefore denied.**
- 13) **The case record speaks for itself and there is nothing in this paragraph to admit or deny. Otherwise, denied.**
- 14) **The case record speaks for itself and there is nothing in this paragraph to admit or deny. Otherwise, denied.**
- 15) **Denied.**

#### Duplication Procedures

- “While each state’s ballot duplication process has unique elements, the majority follow the general procedure below:” – **Denied that the procedure identified below represents the lawful process under the Florida Election Code. Otherwise, without knowledge and therefore denied.**

- Paragraphs 1 through 6 – **Denied that the procedure identified in these paragraphs represents the lawful process under the Florida Election Code. Otherwise, without knowledge and therefore denied.**
- “Mail-Ballots were created by forged signatures or signatures from Artificial Intelligence (AI)” – **Without knowledge and therefore denied.**
- “On observation the personnel were not verifying the signatures diligently.” – **Denied.**
- “The voters have written affidavits that they did not send in their ballot by mail, but their vote was counted. (See Exhibit)” – **Without knowledge and therefore denied.**

#### LEGAL STANDARD

§ 102.168 Contest of election.

OVERVIEW OF STATUTE – **The statute speaks for itself. Otherwise, denied.**

STATUTE (unnumbered paragraph and numbered paragraphs (1) through (8) including subparts) – **The statute speaks for itself. Otherwise, denied.**

- “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.” – **Without knowledge and therefore denied.**
- “Also include facts narrated in all counts” – **Amanda Coffey re-alleges and incorporates by reference the responses to facts narrated in all other counts as if fully alleged here.**

#### 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.” – **Without knowledge and therefore denied.**

○ “Also include facts narrated in all counts” – **Amanda Coffey re-alleges and incorporates by reference the responses to facts narrated in all other counts as if fully alleged here.**

ARGUMENT:

1. **Without knowledge and therefore denied.**

2. **Denied that voter intent was not determined by the Canvassing Board in accordance with Florida law. Otherwise, without knowledge and therefore denied.**

3. **Without knowledge and therefore denied.**

○ “This could be voter apathy or Corruption. The second being the most obvious.” – **Denied that there was any corruption on the part of Amanda Coffey. Otherwise, without knowledge and therefore denied.**

○ Unnumbered paragraphs and bullet list with citations to legal authority and legal encyclopedia articles – **The cited documents speak for themselves. Otherwise, denied.**

LEGAL ARGUMENT with further facts

○ “Plaintiff repeats all above facts and evidence and also states:” – **Amanda Coffey re-alleges and incorporates by reference the responses to facts narrated in all other counts as if fully alleged here.**

○ “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.” – **Denied that Amanda Coffey filed a case against Plaintiff or**

**Rochford and denied that Amanda Coffey was on the Canvassing Board counting and reviewing ballots of the plaintiff. Otherwise, without knowledge and therefore denied.**

○ “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 events.” – **Without knowledge and therefore denied.**

○ “Ehsan Joarder was canvassing the lawsuit of Amanda Coffey (See Exhibit)” – **Denied that Amanda Coffey filed a lawsuit against Plaintiff or Ehsan Joarder. Otherwise, without knowledge and therefore denied.**

○ “Julie Marcus is present at the counting of her own ballots.( See Exhibit)” – **Admitted that the Supervisor was present at the canvassing board during the August 20, 2024, primary election as an advisor in compliance with section 102.141(1)(b), Florida Statutes. Otherwise, without knowledge and therefore denied.**

○ “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.” – **Without knowledge and therefore denied.**

○ “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.” – **Without knowledge and therefore denied.**

○ “The less numbers of voters who voted suggests destruction of ballots.” – **Denied.**

○ Purported content of F.S. § 101.68 – **The statute speaks for itself. Otherwise, denied.**

- All unnumbered paragraphs between “RESULTS” on page 13 and “COUNT II” on page 13 – **Without knowledge and therefore denied.**

## COUNT II

- “Plaintiff repeats all facts narrated in other counts” – **Amanda Coffey re-alleges and incorporates by reference the responses to facts narrated in all other counts as if fully alleged here.**

## Misconduct by the defendants

- “The defendants individually and collectively conspired against the Plaintiff to unfairly win the election.” – **Denied.**
- “The defendants slandered the plaintiff and then further abused their position to falsely fabricate votes, numbers, forms and documents and forge signatures. See Affidavits” – **Denied.**

## MISCONDUCT OF DEFENDANTS

- “The defendants conspired against the plaintiff to unfairly influence the outcome of the election in August 20, 2024.” – **Denied.**
- “The voters and the ballots disappeared.” – **Without knowledge and therefore denied.**
- “There’s 8000 less voters that voted in the primary even though the population increased.” – **Without knowledge and therefore denied.**
- “The candidates had their own personal in the canvassing board.” – **Denied.**
- “Mail-in ballots with forged signatures were created for the corrupt candidates.” – **Without knowledge and therefore denied.**

- “Ballots for the Plaintiff were discarded, changed or replaced with a duplicate ballot.” – **Without knowledge and therefore denied.**
- “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).” – **Denied that Amanda Coffey “has an adversarial relationship with the Plaintiff” other than this lawsuit; Denied that Amanda Coffey was a member of the canvassing board or in violation of any statute; Denied that F.S. 102.168(d) is an accurate statutory citation. Otherwise, without knowledge and therefore denied.**

### COUNT III

#### CONSPIRACY

- “Plaintiff repeats all facts narrated in all other counts” – **Amanda Coffey re-alleges and incorporates by reference the responses to facts narrated in all other counts as if fully alleged here.**
- “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. 102.168I” – **Denied.**

### COUNT IV

#### CORRUPTION

- “Plaintiff repeats all facts, allegations and arguments in all other counts.” – **Amanda Coffey re-alleges and incorporates by reference the responses to facts narrated in all other counts as if fully alleged here.**



- All discussion of the RICO Act and other citations. – **The RICO Act speaks for itself. Otherwise, denied.**
- “The Hillsborough County declared machines were not working.” – **Without knowledge and therefore denied.**
- Purported content of Fla. Stat § 101.5614 – **The statute speaks for itself. Otherwise, denied.**

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” – **The statutes speak for themselves. Otherwise, denied.**
- “Plaintiff repeats all data, facts, evidence and, statements in all other counts.” - **Amanda Coffey re-alleges and incorporates by reference the responses to facts narrated in all other counts as if fully alleged here.**
- “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.” – **Denied.**
- “Wherefore, the election be nullified and candidates Roberth ‘Rocky’ Rochford, James Peters and Ehsaan Joarder be banned from running again.” – **As this appears to be a request of the Court, there is nothing in this paragraph to admit or deny. Otherwise, without knowledge and therefore denied.**

## CONCLUSION

### The Process of Fraud:

- “The fraud was committed in several ways:” – **Denied.**
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?” – **Without knowledge and therefore denied.**
    - “After these ballots were printed, they were printed on the regular printer paper.” – **Without knowledge and therefore denied.**
    - “A large number are blank. ( “large numbers of mail-in ballots are blank” as per Chris Lattimer” See Exhibit).” – **Without knowledge and therefore denied.**
    - “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.” – **Without knowledge and therefore denied.**
  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.” – **Without knowledge and therefore denied.**

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.” – **Without knowledge and therefore denied.**

○ “The canvassing board reviewed ballots before tabulating them.” – **Admitted that ballots were reviewed to the extent required by Fla. Stat. § 102.141. Otherwise, denied.**

○ “They removed, rejected or destroyed ballots of the Plaintiff.” – **Denied.**

○ “I heard one such conversation in person.” – **Without knowledge and therefore, denied.**

○ “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.” – **Without knowledge and therefore denied.**

○ “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.” – **Denied**

**that there was any fraud or corruption on the part of Amanda Coffey. Otherwise, without knowledge and therefore denied.**

○ “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.” – **Denied.**

○ “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)” – **Without knowledge and therefore denied.**

○ “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.” – **Denied.**

○ “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.” – **Denied.**

○ “A fair election is the right of the people and the foundation of democracy.” – **Admitted.**

○ “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.” – **Denied that Amanda Coffey**

**participated in any unfair means, fraud, corruption, conspiracy, misconduct or lies. Otherwise, without knowledge and therefore denied.**

○ “As the People of United States of America deserve Honest Elections, Leadership and Government.” – **Admitted.**

○ “Thus, the Plaintiff Dr. Neelam Taneja Perry be nominated as the Republican Nominee for Florida District 14.” – **As this appears to be a request of the Court, there is nothing in this paragraph to admit or deny. Otherwise, without knowledge and therefore denied.**

### **GENERAL DENIAL**

Amanda Coffey denies all allegations not expressly admitted above.

### **DEFENSES**

#### **FIRST**

Amanda Coffey asserts and incorporates by reference all defenses identified in the Motion to Dismiss dated September 16, 2024.

#### **SECOND**

Amanda Coffey asserts and incorporates by reference the defenses identified in the Motion to Strike Plaintiff’s Complaint dated September 6, 2024.

#### **THIRD**

Plaintiff has not alleged facts which demonstrate that this court has subject matter jurisdiction as the Elections Clause of the U.S. Constitution reserves jurisdiction to the U.S. House of Representatives.

#### **FOURTH**

Plaintiff lacks standing because the Supervisor and Deputy Supervisor are not proper

parties in a lawsuit contesting a federal election as no injury in fact is traceable to the Supervisor or Deputy Supervisor. Section 102.168(4), Florida Statutes provides that the proper defendants are the Elections Canvassing Commission and the successful candidate.

**FIFTH**

Venue is improper in Pinellas County because the contested election covers more than one county and section 102.1685, Florida Statutes provides that venue shall be in Leon County.

**SEVENTH**

The Complaint fails to plead claims involving alleged fraud and RICO violations with specificity according to the heightened pleading standard.

**EIGHTH**

The Complaint fails to state any viable cause of action to contest the subject election pursuant to section 102.168(3), Florida Statutes.

**NINTH**

The Complaint fails to plead facts sufficient to change or place doubt in the result of the election pursuant to sections 102.168(3)(a), (c), or (d).

**TENTH**

The Complaint fails to include the Elections Canvassing Commission as an indispensable party pursuant to section 102.168(4).

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on September 16, 2024, the foregoing document was filed with the Clerk of the Court by using the Florida Courts E-Filing Portal, and served to the following parties:

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/s/ Andrew P. Keefe  
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