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IN THE FLORIDA SUPREME COURT

ALBERT ROBINSON

Petitioner

v.

SECTION 23 PROPERTY OWNER'S
ASSOCIATION, INC., a Florida

corporation,

DAVID KEITH OAKS,
KEATHEL CHAUNCEY,
JANE ROBINSON,
and ANITA ROBINSON

Respondents

Case No.: SC19-30

Lower Court case No. 14-601-CC

11-3581-CA

**PLAINTIFF'S MOTION TO
KEEP THE INSTANT CASES IN
FRONT OF THE FLORIDA
SUPREME COURT**

COMES NOW PETITIONER Albert Robinson who moves the esteemed Justices to retain these instant causes of action under the jurisdiction of this Court because if they are sent to the 2nd District Court of Appeals ("2nd DCA") the 2nd DCA will again DENY the writ and rule in favor of the non-existent ghost corporation created by attorney David Keith Oaks for the sole purpose of running a major fraud scheme. This of course is in direct violation of F.S. 607.1622(8) pertaining to corporations that have not paid their annual taxes and/or have not filed an annual report. In THMI v. Nunziata (ruling attached) Judge Darryl Casanueva concluded that a corporation that has not paid its annual taxes nor filed an annual report is barred by F.S. 607.1622(8) from maintaining or defending any

1 action in the state of Florida. See first paragraph page three of the ruling.
2 Therefore Judge Casanueva has firsthand knowledge of, and has ruled according
3 to F.S. 607.1622(8) in THMI but has refused to abide by F.S. 607.1622(8) in all of
4 my appeals and accept his legal obligation to deny the non-existent ghost
5 corporation the right to defend. See rulings attached as composite Exhibit "B"
6 rulings from Judge Casanueva denying my requests for a writ of prohibition to
7 remove Judge Lisa Marie Spader Porter from 11-3581-CA and my other cases.
8
9

10
11 It is the objective of the judges running the fraud scheme to keep all of my
12 cases in front of Judge Porter and judge John Leo Burns since they appear to be
13 involved in the fraud scheme. Ex-judge Jay Barry Rosman was running the show
14 for a while until he was arrested on solicitation of prostitution charges. I attach as
15 Plaintiff's Exhibit "0355" a copy of the arrest report.
16

17
18 When the honorable Judge Donald H. Mason refused to play ball and rule in
19 favor of the ghost corporation ex-judge Rosman signed an order removing all of
20 the cases from Judge Mason and transferring them to Judge Porter who already
21 refused to get to the truth. I attach as Petitioner's Exhibit "0041" a copy of the
22 transcripts in which Judge Porter admits that "we're not going to" when I told her
23 that we haven't yet, discovered the truth. This is an outright show that Judge
24 Porter is disregarding her legal obligation and is ruling in favor of the ghost
25 corporation and that Judge Casanueva will only deny my request, with prejudice
26
27
28

1 again, thus keeping not only my case in front of Judge Porter but all Section 23
2 deed restriction violation cases as well. See Exhibit "A" - orders.

3
4 If the cases are sent to the 2nd DCA you might as well just deny them now so
5 that we can move on to the U.S. Supreme Court since in 14-601-CC Judge John
6 Leo Burns defied a federal injunction and sold my home based on the claims of
7 David Keith Oaks who was representing the non-existent ghost corporation. I
8 attach as Petitioner's Exhibit "0248e" a copy of the order in which Judge Burns
9 modifies or annuls the automatic stay. Any orders issued by a county court judge,
10 in violation of the 362 automatic stay, are void ab initio. See; Killmer-No-07-
11 36011-Bankr-SDNY-11-15.

12 CONCLUSION

13
14 Therefore I am at this time requesting that this Court retain jurisdiction over
15 my requests and to step in and put an end to the major fraud scheme involving the
16 use of a non-existent ghost corporation filing hundreds of suits and the
17 involvement of judges Lisa Marie Spader Porter, John Leo Burns, Paul
18 Alessandroni, Peter Bell, Charles Williams, Kimberly Carlton-Bonner, Andrea
19 McHugh, George Richards, and Darryl Casanueva, or just deny it now. Sending
20 the cases to the 2nd DCA without issuing an order to adhere to F.S. 607.1622(8) is
21 just a monumental waste of time, paper and resources as the outcome has already
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1 been predicted by way of the numerous previous denials with prejudice.

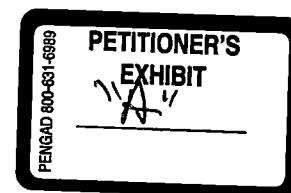
2
3 CERTIFICATION OF SERVICE

4 I HEREBY CERTIFY that the foregoing document was served via U.S. mail to
5 Anita Robinson at P.O. Box 7962, North Port, Florida, Jane Robinson at 57
6 McCormick Blvd., Bridgeton, N.J. and via email to; Ms. Lindsay Katz at
7 lindsay@shendellpollock.com and gary@shendellpollock.com; David Keith Oaks
8 at doaksesq@comcast.net, David James. Melvin, Esq., dmelvin@bltfl.com,
9 contact@bltfl.com, attorney of record for judges Lisa Marie Spader Porter and
10 John Leo Burns, Caryn Siperstein-Klien at
11 carynsipersteinklien@myfloridalegal.com, attorney of record for Richard B. Akin
12 II who is the attorney of record for the non-existent ghost corporation known
13 herein as Section 23 Property Owner's Association, Inc., a Florida corporation,
14 Gregg D. Weinstock at g.weinstock@vbnpnlaw.com, Julie A Kennedy at
15 julie.a.kennedy.esq@gmail.com, raburcz@aol.com all on the date of Tuesday,
16
17
18
19
20
21 February 12, 2019

22
23 

24 Mr. Albert Robinson
25 P.O. Box 1961
26 Suwanee, GA 30024
27 (561) 401-5977

28 DiscoveryTeamAlpha@gmail.com



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

April 9, 2015

CASE NO.: 2D15-868

L.T. No. : 11-3581-CA

Albert Robinson

v. Section 23 Property Owner
Association, Inc.

Appellant / Petitioner(s),

Appellee / Respondent(s).

BY ORDER OF THE COURT:

The petition for writ of prohibition is denied with prejudice. See Sumner v. Sumner, 707 So. 2d 934 (Fla. 2d DCA 1998).

CASANUEVA, SILBERMAN, and CRENSHAW, JJ., Concur.

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

Served:

David K. Oaks, Esq.
Hon. Lisa Porter

Albert M. Robinson
Jane Robinson

Barbara Scott, Clerk

td


James Birkhold
Clerk



BARBARA T. SCOTT
CLERK, DISTRICT COURT
CHAMBERLAIN, FL

2015 MAY - 8 AM 11:10

FILED

CC: STAFF ATTORNEY
JUDGE PORTER

ORDER NOW FINAL

Clerk, Second District
Court of Appeal

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

April 9, 2015

CASE NO.: 2D15-867

L.T. No. : 14-2270-CA

Albert Robinson

v.

Section 23 Property Owner
Association, Inc.

Appellant / Petitioner(s),

Appellee / Respondent(s).

BY ORDER OF THE COURT:

The petition for writ of prohibition is denied with prejudice. See Sumner v. Sumner, 707 So. 2d 934 (Fla. 2d DCA 1998).

CASANUEVA, SILBERMAN, and CRENSHAW, JJ., Concur.

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

Served:

Curtright C. Truitt, Esq.
Hon. Lisa Porter

Albert M. Robinson

Barbara Scott, Clerk

td


James Birkhold
Clerk



BARBARA A. SCOTT
CLERK OF CIRCUIT COURT
CHAMBERLAIN CO., FL.

2015 MAY - 8 AM 11: 09

FILED

CC: STAFF ATTORNEY
JUDGE PORTER

ORDER NOW FINAL

Clerk, Second District
Court of Appeals

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

April 9, 2015

CASE NO.: 2D15-863
L.T. No. : 14-2242-CA

Albert Robinson v. Joseph Wilfred Harris, Et Al.,
Appellant / Petitioner(s), Appellee / Respondent(s).

BY ORDER OF THE COURT:

The petition for writ of prohibition is denied with prejudice. See Sumner v. Sumner, 707 So. 2d 934 (Fla. 2d DCA 1998).

CASANUEVA, SILBERMAN, and CRENSHAW, JJ., Concur.

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

Served:

David K. Oaks, Esq.
Barbara Scott, Clerk

Curtright C. Truitt, Esq.
Hon. Lisa Porter

Albert M. Robinson

td

James Birkhold
James Birkhold
Clerk



BARBARA T. SCOTT
CLERK OF CIRCUIT COURT
CHARLOTTE CO., FL

2015 MAY -8 AM 11:10

FILED

CC: STAFF ATTORNEY
JUDGE PORTER

ORDER NOW FINAL
Clerk, Second District
Court of Appeals

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

April 9, 2015

CASE NO.: 2D15-867

L.T. No. : 14-2270-CA

Albert Robinson

v.

Section 23 Property Owner
Association, Inc.

Appellant / Petitioner(s),

Appellee / Respondent(s).

BY ORDER OF THE COURT:

The petition for writ of prohibition is denied with prejudice. See Sumner v. Sumner, 707 So. 2d 934 (Fla. 2d DCA 1998).

CASANUEVA, SILBERMAN, and CRENSHAW, JJ., Concur.

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

Served:

Curtright C. Truitt, Esq.
Hon. Lisa Porter

Albert M. Robinson

Barbara Scott, Clerk

td


James Birkhold
Clerk



BARBARA F. SCOTT
CLERK OF DISTRICT COURT
CHAMBER 910 CO. FL.

2015 MAY - 8 AM 11: 09

FILED

CC: STAFF ATTORNEY
JUDGE PORTER

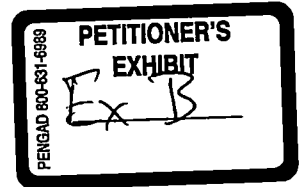
ORDER NOW FINAL

Clerk, Second District
Court of Appeals

NOT FINAL UNTIL TIME EXPIRES TO FILE REHEARING
MOTION AND, IF FILED, DETERMINED

IN THE DISTRICT COURT OF APPEAL
OF FLORIDA
SECOND DISTRICT

GENERAL ELECTRIC CAPITAL CORP.,)
)
Petitioner,)
)
v.)
)
RICHARD NUNZIATA, as Personal)
Representative of the Estate of ELVIRA)
NUNZIATA; TRANS HEALTH)
MANAGEMENT, INC.; and RUBIN)
SCHRON,)
)
Respondents.)
_____)



Case No. 2D13-422

Opinion filed August 14, 2013.

Petition for Writ of Certiorari to the Circuit
Court for Pinellas County; Pamela A.M.
Campbell, Judge.

Carol A. Lisko of Hogan Lovells US LLP,
Miami, for Petitioner.

Isaac R. Ruiz-Carus, Bennie Lazzara, Jr.,
and Joanna M. Greber of Wilkes &
McHugh, P.A., Tampa, for Respondent,
Richard Nunziata.

No appearance for remaining
Respondents.

CASANUEVA, Judge.

General Electric Capital Corp. (GECC) has filed a petition for a writ of certiorari, challenging the trial court's order denying its motion for a protective order from a subpoena duces tecum. We grant the petition, concluding that the trial court departed from the essential requirements of the law, causing material injury throughout the remainder of the proceedings below, and effectively leaving no adequate remedy on appeal by requiring GECC to divulge extensive business records that are related to the underlying action in a rarely seen tenuous manner. We have jurisdiction. See Nussbaumer v. State, 882 So. 2d 1067, 1072 (Fla. 2d DCA 2004) ("[T]he only way that a nonparty claiming privilege may test a court's order—other than by certiorari—is to risk a contempt citation and then to appeal if cited for contempt. However, this is 'too great a price.' " (quoting Briggs v. Salcines, 392 So. 2d 263, 266 (Fla. 2d DCA 1980))).

Background

Respondent Richard Nunziata is the personal representative of the estate of his mother, Elvira Nunziata. Ms. Nunziata died in 2004 after she sustained severe injuries in the nursing home where she was a patient. Mr. Nunziata instituted a nursing home malpractice case against the nursing home's corporate licensee, several other corporations, and its supervisory staff, including respondent Trans Health Management, Inc. (THMI). THMI had provided back-office functions at the nursing home until several months before Ms. Nunziata's accident that led to her death. As is typical in nursing home litigation, all the upchain corporate entities or natural persons associated with these upchain corporations who had an interest in the nursing home or who provided various services to the nursing home were also defendants in the suit. But the parent company of THMI, Trans Health, Inc. (THI), was not among the listed defendants. All

the defendants except THMI settled before trial, but THMI defaulted and did not appear at the bench trial on liability. Thus, the trial court entered a judgment against THMI on liability and held a jury trial on damages alone.¹ The jury returned a verdict in favor of Mr. Nunziata for \$60 million in compensatory damages and \$140 million in punitive damages.² Attempting to locate assets to satisfy his \$200 million award, Mr. Nunziata instituted a proceeding supplementary in aid of execution and served a subpoena duces tecum on GECC. As is clear from this narrative, GECC is not the judgment debtor.

GECC is a lender of capital. Through its Healthcare Financial Services Division, GECC lends healthcare businesses money to finance projects. In 2002, several of THI's subsidiaries—but not THMI—borrowed \$55 million; THMI was, however, one of sixteen guarantors of that loan. The original lender subsequently transferred this loan to GECC for consideration. The borrowers on that loan defaulted, but GECC never looked to THMI for repayment. Instead, GECC restructured the loan in

¹THMI's status as a corporation permitted to conduct business in Florida was revoked in 2004 for failure to file an annual report with the Department of State. Section 607.1622(8), Florida Statutes (2004), provided:

Any corporation failing to file an annual report which complies with the [filing] requirements of this section shall not be permitted to maintain or defend any action in any court of this state until such report is filed and all fees and taxes due under this act are paid and shall be subject to dissolution or cancellation of its certificate of authority to do business as provided in this act.

There is no indication in the record before us that THMI corrected its revoked status prior to the trial court entering the default judgment on liability.

²Mr. Nunziata had alleged that the nursing home staff knew of Ms. Nunziata's propensity to wander off without supervision and that safety precautions at the nursing home were substandard. Ms. Nunziata's death resulted from falling down a stairwell in her wheelchair.

2006 and, importantly, THMI ceased, with GECC's approval, being a guarantor of the newly-restructured loan.

Regardless of the fact that since 2006 THMI no longer had any connection to the loan, and regardless of the fact that THMI was no longer under contract for back-office functions at the time of Ms. Nunziata's accident, Mr. Nunziata subpoenaed GECC pursuant to Florida Rule of Civil Procedure 1.560, the rule of procedure relating to discovery of assets of a judgment debtor.³ The subpoena duces tecum listed fifty-seven separate document requests in seventeen single-spaced pages, and many of the individual requests had nine or more subparts. But only three requests arguably referred to THMI. The general tenor of the requests appears to delve into GECC's internal matters, including documents relating to its accounting reserves, underwriting and servicing of loans issued to other of THI's subsidiaries, and communications related to a January 2012 agreement to which THMI is not a party.

GECC objected to the wide-ranging scope of the discovery request, but it offered to provide all documents in its possession that mentioned THMI—which were very few—as well as to allow Mr. Nunziata's counsel to use in this case the more than 278,000 pages of documents it had produced in a different case, also against THMI. But Mr. Nunziata's counsel rejected this offer, so GECC moved for a protective order.

The trial court held a multiday hearing on GECC's motion for protective order and its objections to the fifty-seven discovery requests. The trial court denied the

³Florida Rule of Civil Procedure 1.560, titled "Discovery in Aid of Execution," provides, in pertinent part: "(a) In General. In aid of a judgment, decree, or execution the judgment creditor or the successor in interest, when the interest appears of record, may obtain discovery from any person, including the judgment debtor, in the manner provided in these rules."

motion for protective order and overruled all of GECC's objections except for objections to seven requests that Mr. Nunziata's counsel withdrew during oral argument. The trial court also refused to grant GECC's request for a confidentiality order to protect it from unwarranted disclosure of documents relating to GECC's accounting reserves and internal loan-underwriting analyses. Instead, the trial court ordered GECC to present its confidential documents at an all-day in camera hearing. Not willing to comply with this burdensome task and believing it was being subjected to a fishing expedition at the hands of Mr. Nunziata's counsel, GECC petitioned this court for a writ of certiorari to quash the trial court's orders.

Analysis

It is clear to this court that Mr. Nunziata's counsel has painted the proceedings supplementary with a very wide brush vis-à-vis GECC. GECC is not the judgment debtor in this case, and from what we can glean from the record before this court, the relationship between GECC and THMI is, at best, very remote and, at worst, nonexistent since 2006 when THMI's role as guarantor of the original loan to THI's other subsidiaries terminated. This court has held that discovery in aid of execution cannot be used to pry into the assets and business of persons other than the judgment debtor, unless the judgment creditor can provide a good reason and close link between the unrelated entity and the judgment debtor. See, e.g., Walter v. Page, 638 So. 2d 1030 (Fla. 2d DCA 1994). Mr. Nunziata suggests that there has been commingling of assets so as to allow inquiry into GECC's financial affairs, but the record does not persuade us that the relationship between THMI and GECC provides such a close link.

The circumstances of Walter parallel this case. The plaintiff/appellee in Walter, Dominic Longo, had obtained a judgment for breach of contract against defendants Stephen Page and Florida Financial Partners, Inc. (FFP). The appellant, Barbara Walter, was a corporate officer of FFP. In proceedings supplementary, she was served with a subpoena duces tecum for deposition and to produce FFP's business documents and her personal financial records. She moved for a protective order and claimed, similarly to GECC here, that the request was too broad in requiring her personal information. The trial judge at first denied her motion for protective order, but after she filed an emergency motion to stay discovery, a different trial judge granted her motion to stay in part, ruling that Longo could not depose her regarding her personal finances and assets because she was not subject to the judgment Longo had obtained against FFP. She was deposed on FFP's financial records and then filed an appeal from the order denying her motion for protective order. Id. at 1031.

This court agreed with Ms. Walter that the subpoena duces tecum was too broad in seeking "virtually all of [her] personal financial documents." Id. We noted, as we note again here, that a "subpoena duces tecum is not the equivalent of a search warrant [] and should not be used as a fishing expedition to require a witness to produce broad categories of documents which the party can search to find what may be wanted." Id. (citing Palmer v. Servis, 393 So. 2d 653 (Fla. 5th DCA 1981)). This is especially true where the person subject to the subpoena is not the judgment debtor. See, e.g., Jim Appley's Tru-Arc, Inc. v. Liquid Extraction Sys. Ltd. P'ship, 526 So. 2d 177, 179 (Fla. 2d DCA 1988) (prohibiting discovery by judgment creditor into separate income and assets of judgment debtor's wife). If a proper predicate is laid, someone

other than the judgment debtor may be required to submit to financial discovery, but in this case, Mr. Nunziata's counsel has not laid the proper predicate. Cf. Jerry's S., Inc. v. Morran, 582 So. 2d 803 (Fla. 1st DCA 1991) (granting writ of certiorari and quashing pretrial order requiring nonparty corporate defendants to produce all business records of the corporations in plaintiff's search for information regarding ownership of bar that provided service to allegedly intoxicated patron who subsequently threatened and struck plaintiff).

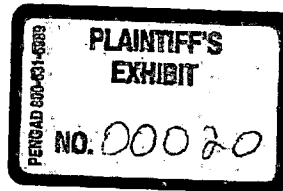
Conclusion

The trial court erred in denying GECC's motion for protective order. Mr. Nunziata's far-reaching requests for GECC's internal operating documents were not properly limited in seeking the assets of the judgment debtor, THMI, that are possibly subject to execution. "In the context of postjudgment discovery, matters relevant to the subject matter of the pending action or which would lead to the discovery of admissible evidence, per [Florida] Rule [of Civil Procedure] 1.280(b)(1), would encompass matters identifying or leading to the discovery of assets available for execution" 4 Bruce J. Berman, Berman's Florida Civil Procedure, ¶ 560.3[5] (2013). Mr. Nunziata has not shown that to be the case here.

We grant the writ of certiorari, quash the order below, and remand for further proceedings.

DAVIS, C.J., and BLACK, J., Concur.

IN THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR CHARLOTTE COUNTY, FLORIDA

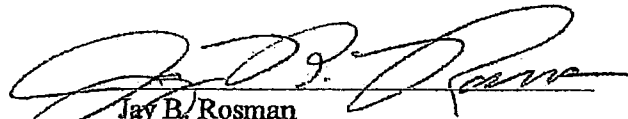


ORDER

EFFECTIVE January 6, 2015, all Civil and Mental Health Court cases currently assigned to the Honorable Donald H. Mason, are hereby reassigned to the Honorable Lisa S. Porter.

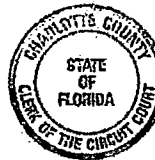
THE CLERK is hereby directed to change the assignment to comply with the above.

DONE AND ORDERED in Chambers, in Fort Myers, Lee County, Florida, this 17th day of December, 2014.


Jay B. Rosman
Chief Judge

cc: Honorable Jay B. Rosman, Chief Judge
Honorable Paul Alessandroni, Administrative Judge
Honorable Donald H. Mason
Honorable Lisa S. Porter
Charlotte Court Administration
Lee Court Administration

SAW: sdh
14-57



Certified to be a true and correct copy of the original document on file.
 This copy has no redactions
 This copy has been redacted pursuant to law.
Witness my hand and official seal this 19 day of December, 20 14.
BARBARA Y SCOTT, Clerk of Circuit Court
By Carlynn Deputy Clerk

IMAGED
SG

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
CHARLOTTE COUNTY, FLORIDA CIVIL ACTION

SECTION 23 PROPERTY OWNER'S
ASSOCIATION, INC., a Florida
corporation,

PLAINTIFF'S
EXHIBIT
NO. 00021

Plaintiff,

Case No. 95-799-CA-DCC

v.

ROBERT KLECKA and RUTH KLECKA,

RECORD VERIFIED - BARBARA T. SCOTT, CLERK
BY JOANNE KING D.C.

Defendants.

FINAL JUDGMENT

THIS CAUSE coming before me upon the Plaintiff's Motion for Entry of Default Final Judgment, the Defendants having appeared before the Court on the hearing of this motion and Defendants having stipulated to the entry of this Final Judgment, the Court having reviewed the Court file and otherwise being fully advised in these premises, it is hereupon

FILED
95 SEP 15 AM 9:58
CLERK OF THE CIRCUIT COURT
CHARLOTTE COUNTY, FLORIDA

ORDERED and ADJUDGED that the Defendants ROBERT KLECKA and RUTH KLECKA shall be permanently and mandatorily enjoined from violating the Declaration of Restrictions recorded at Official Record Book 393, Page 608 as amended which restrict the use of Lot 4, Block 644, PUNTA GORDA ISLES, Section 23 according to the Plat thereof, as recorded in Plat Book 12, Pages 2A thru 2Z41 of the public records of Charlotte County, Florida. Defendants shall comply with the restrictions in all respects now and in the future including paragraph seventeen as recorded at OR Book 393, Page 611 which states that the described real property shall be maintained in a like-new condition and shall be kept freshly painted, that no weeds, underbrush or other unsightly growths shall be permitted to

★ CIVIL #30

N/C
CIVIL
MH -2

IMAGED
MH

Record Verified: LINDA D SIMMONS, D.C.

File: 375664 OR BOOK/PAGE: 1422/0641
Recorded: 09/19/95 01:48 P.M.
Barbara T. Scott, Clerk of the Circuit Court - Charlotte County

grow or remain upon the premises, no refuse pile or unsightly objects shall be allowed to be placed or suffered to remain anywhere thereon. All of the landscaping including the grass shall be kept as befitting a high-quality lawn and any plants, grass, shrubs that might die or become other than luxuriant and well-formed shall be promptly replaced. It is further

ORDERED and ADJUDGED that the Court will retain jurisdiction to enforce the terms of this permanent mandatory injunction however based upon the stipulation of the parties, enforcement of this injunction shall not take place until after thirty (30) days from the date of this Final Judgment.

DONE and ORDERED in Chambers, Charlotte County Courthouse, Punta Gorda, Florida this 11 day of September, 1995.


HONORABLE DARRYL C. CASANUEVA
Circuit Judge

Copies Furnished:

David K. Oaks, Esq.
Robert and Ruth Klecka

1 THE COURT: But I'm trying to get you to a
2 trial as fast as possible so you don't have to --

3 MR. ROBINSON: With a lawyer?

4 THE COURT: I don't care if it is with or
5 without a lawyer. You just told me that you
6 wanted -- you're paying a hundred dollars a day or
7 something in the meantime. Well, let's get --

8 MR. ROBINSON: They're billing it against the
9 property so they can put a lien on the property and
10 take it. That's the scheme.

11 THE COURT: Let's get to trial so we can
12 resolve all the issues. That's what I'm trying to
13 do.

14 MR. ROBINSON: Your Honor, there seems to be
15 a rush to trial and a covering up of the truth. You
16 know --

17 THE COURT: Sir.

18 MR. ROBINSON: -- we can't just rush to
19 trial, Your Honor. We have to come to the truth
20 here; we have to find the truth.

21 THE COURT: And that's what the trial is for.
22 We're going to discover the truth.

23 MR. ROBINSON: We haven't yet, Your Honor.

24 THE COURT: And the quicker that we get
25 there -- we're not going to. This is all discovery.



IN THE COUNTY COURT OF THE TWENTIETH JUDICIAL CIRCUIT IN AND FOR
CHARLOTTE COUNTY, FLORIDA CIVIL ACTION

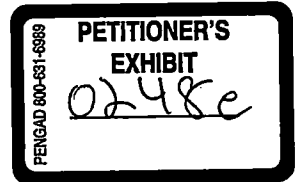
**SECTION 23 PROPERTY OWNER'S
ASSOCIATION, INC.,**

Plaintiff,

v.

JANE B. ROBINSON, individually and
as Trustee of the Jane B. Robinson
Revocable Trust, dated May 15, 2008, et al.,

Defendants.



Case No. 14-601-CC

BARBARA T. SCOTT
CLERK OF CIRCUIT COURT
CHARLOTTE COUNTY, FLA.

2016 JAN 15 PM 4:14

FILED

ORDER

THIS CAUSE coming before me upon the Third Party Purchaser 25264 Padre Ln Land Trust's Motion to Vacate Foreclosure Sale, Certificate of Sale and Certificate of Title, the Court having heard argument of counsel and otherwise being fully advised, the Court finds and rules as follows:

1) That the Court has reviewed the bankruptcy docket in re: **JANE BARBARA ROBINSON**, Case No. 14-34718, United States Bankruptcy Court, District of New Jersey.

2) That the subject property was claimed as exempt as noted on the Trustee's Notice of Abandonment and that no objection to the claim of exemption was filed within 30 days after the conclusion of the creditor's meeting which was adjourned on March 16, 2015 resulting in an Order of Discharge of March 27, 2015.

3) That the Trustee filed its report of No Distribution on June 1, 2015 finding that the Trustee did not receive any property or paid any money on account of the estate and that the Trustee be discharged from any further duties as Trustee.

4) That the Motion of Third Party Purchaser 25264 Padre Ln Land Trust to vacate

the sale dated October 11, 2015 be and the same is hereby denied as the Court finds that it had jurisdiction to conduct the foreclosure sale.

DONE and ORDERED in Chambers, Charlotte County Justice Center, Punta Gorda, Florida this 15 day of January, 2016.



HONORABLE JOHN L. BURNS
County Judge

Copies Furnished:

David K. Oaks, Esq. - courthouse box

Andra Brumberg, Esq. - ABrumberg@BLTFL.com

Jane B. Robinson, individually and as Trustee 57 McCormick Road, Bridgeton, NJ 08302

Albert Robinson and Anita Robinson, P.O. Box 495-672, Port Charlotte, FL 33949

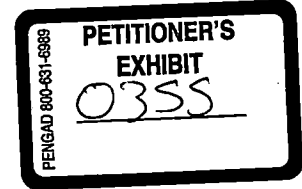
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1-15-16



Naples Police Department
 355 Riverside Circle • Naples, Florida 34102
 239-213-4844

Report Number: 18-0000281-001

OFFENSE / INCIDENT REPORT



Narrative:

OFFICER	NARRATIVE DATE	TITLE
F.S.S. 119.071(4)(C)	02/09/2018	02/09/2018

On 02/09/2018, Detectives with the Naples Police Department Crime Suppression Team conducted an undercover reverse prostitution operation at 2555 US41 North (Gulf Coast Inn) to address the criminal element of solicitation and supporting criminal activity within the City of Naples. The operation utilized Detective F.S.S. 119.071(4)(C) and Officer F.S.S. 119.071(4)(C), who were working in an undercover capacity posing as prostitute's.

At approximately 1914 hours, a male later identified as Jay Barry Rosman W/M DOB F.S.S. 119.071(4)(D)(1) arrived at the hotel in response to an ad that had been placed online.

Upon entering the room, Rosman began in conversation with both undercover officers. Rosman stated that he wants both girls, but doesn't want to talk details. Rosman stated that he doesn't want to get arrested because he didn't see reviews. Rosman then asked if everything was covered for \$300.00 and placed an envelope of \$300.00 on the table stating "that's for 2." Rosman then asked if he could touch them, at which time he walked over to Detective F.S.S. 119.071(4)(C) and began to rub her breasts. Rosman then stated to Detective F.S.S. 119.071(4)(C) and Officer F.S.S. 119.071(4)(C) "why don't you both come her." Rosman then pulled in pants and underwear down, exposing his genitals and stated again "why don't you both come down here.

At that time, Officer F.S.S. 119.071(4)(C) gave the predetermined takedown signal, at which time the arrest team entered the hotel room. Upon entering, I Detective F.S.S. 119.071(4)(C) advised Rosman to turn around and place his hands behind his back. I then grab both of Rosman's arms placing them behind his back in attempt to place him into hand restraints. Rosman immediately began to tense his arms/hands and moving. I advised Rosman to stop moving. As I attempted to place the hand restraints on Rosman, he began to physically pull his arms away from Officer Martinez and I, actively resisting. Rosman then turned his body toward the door stating "please let me go." Rosman was advised to stop. Due to Rosman continuing to pull his arms away from us and physically resisting arrest, we then escorted Rosman to the ground to gain better control of him. Detective F.S.S. 119.071(4)(C) advised Rosman multiple times to stop resisting, but Rosman continued. I was able to get control of Rosman's right arm and apply a handcuff on it. Rosman was ordered multiple times by Detective F.S.S. 119.071(4)(C) to give us his left hand, which he was keeping under his body. Eventually we were able to get Rosman into handcuffs.

Rosman was then transported to our mobile processing command vehicle where booking sheets were completed.

Rosman was then transported to the Naples Jail Center where he was booked for Soliciting for Prostitution F.S.S. 796.07(2)f and Resisting Arrest w/o Violence F.S.S. 843.02.

All video/audio evidence and the \$300.00 was placed into the Naples Police Department Property/Evidence.