NO. 19-5713 ORIGINAL

IN THE SUPREME COURT OF THE UNITED STATE

LARAEL OWENS

PETITIONER

V.

TAMESHA SADDLERS AND FLORIDA DOR

RESPONDENT

ON PETITION FOR A WRIT OF CERTIORARI

FROM FLORIDA SECOND DISTRICT COURT OF APPEALS

L.T CASE 14DR9279

2DCA CASE

2D18-3309

2D18-2935

2D18-2592

LARAEL OWENS

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With respect to Rule 12.4 The Florida Second DCA consolidated all three cases for review purposes so all orders are the same. Mr. Owens seeks review on all three cases

QUESTIONS PRESENTED

1.) Is a judgment that was issued from a lower court void if the lower court did not offer a hearing for that matter?
2.) If a financial affidavit has false information on it, is that considered a fraudulent financial affidavit?
3.) If a judge has a financial interest in a case, can he be considered bias towards the defendant?
4.) Has the petitioner due process rights been violated

LIST OF PARTIES

LARAEL OWENS PETITIONER
TAMESHA SADDLERS AND FLORIDA DOR RESPONDENT

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Armstrong v. Manzo, 380 U. S. 545, 552 (1962).

CONSTITUTIONAL PROVISIONS

Fourth Amendment, U.S. Constitution.....

Fifth Amendment, U.S. Constitution.....

Fourteenth Amendment, U.S. Constitution.....

Article 1 of the Florida Constitution Section Nine and Ten

STATUTORY PROVISIONS

18 U.S. Code 241, Conspiracy against rights.....

18 U.S. Code 242, Deprivation of rights under color of law.....

Florida Rule of Civil Procedure 1.540(b) provides "(b) Mistakes; Inadvertence; Excusable Neglect; Newly Discovered Evidence; Fraud; etc. On motion and upon such terms as are just, the court may relive a party or a party's legal representative from a final judgment... for the following reasons... (3) fraud (whether heretofore denominated intrinsic or extrinsic), misrepresentation, or other misconduct of an adverse party; ... The motion shall be filed within a reasonable time, and for reasons (1), (2), (3) not more than 1 year after the judgment, decree, order, or proceeding was entered or taken. "

Florida Family rules of Civil Procedure 12.540 (a) provides that there should be no time limit for motions filed to have a decree judgment set aside because of fraudulent financial affidavits.

1Fla. R. App. P. 9.040(c) ("If a party seeks an improper remedy, the cause shall be treated as if the proper remedy had been sought . . . .").

OPINIONS BELOW

With respect to Rule 12.4 The Florida Second DCA consolidated all three cases for review purposes so all orders are the same. Mr. Owens seeks review on all three cases

Owens appealed four of the L.T decisions on 6/29/18 from an order dismissing with prejudice supplemental petition for modification of child support. Then, on 7/18/18, Owens appealed an order denying former husbands "Motion contesting wage garnishment/bank levy/motion to have final judgment of dissolution set aside and order denying former husband's motion to disqualify. On 8/8/2018, Owens appealed order prohibiting further filings without the representation of licensed Florida Attorney for abuse of Judicial Resources.

2DCA CASE

2D18-3309 order prohibiting further filings without the representation of licensed Florida Attorney for abuse of Judicial Resources the last hearing before this order was held on February 15th 2018 "CIVIL CONTEMPT/ENFORCEMENT

2D18-2935 Motion contesting wage garnishment/bank levy/motion to have final judgment of dissolution set aside and order denying former husband's motion to disqualify

2D18-2592 Dismissing with prejudice supplemental petition for modification of child support.

Order dated August 20, 2018 for fees. Order dated August 28, 2018 was for a response. September 13, 2018 order was for denied miscellaneous motion. December 20, 2018 order was for Grant Motion to Strike. Order dated January 7, 2019 was the Order Denied for the court to take judicial notice. January 9, 2019 order was denied for a written opinion. May 24, 2019 cases were affirmed. July 3, 2019 order denied appellee notice to strike as moot. July 11, 2019 order, rehearing denied.

The Petitioner is not a lawyer and his pleadings cannot be treated as such. In fact, according to *Haines v Kerner* , 404 U.S 519 (1972), a complaint, "however inartfully pleaded," must be held to "less stringent standards than formal pleadings drafted by lawyers: and can only be dismissed for failure to state a claim if it appears "beyond doubt that the plaintiff can prove no set of facts in support of his claim which would entitle him to relief." ID., at 520-521, quoting *Conley v. Gibson,* 355 U.S. 41, 45-46 (1957). "[A] pro se petitioner's pleadings should be liberally construed to do substantial justice." United States v. Garth, 188 F.3d 99, 108 (3d Cir. 1999).

STATEMENT OF BASIS FOR JURISDICTION

The Jurisdiction of this court is invoked under 28 U.S. Code 1257(a).

The U.S. Supreme Court has jurisdiction to take review of these cases because petitioner is still within the Ninety days for review of this court. The per curiam affirmance sought to be reviewed was entered by the Second DCA on May 24, 2019. The Florida Supreme Court determined it should decline to accept jurisdiction. See Jenkins v. State, 385 So.2d 1356, 1359 (Fla. 1980). Because a PCA does not say anything at all, the Florida Supreme court lacks jurisdiction to consider petitions seeking review of a PCA. Therefore, the Second DCA was the state court of last resort from which Petitioner could seek review. See, e.g., Williams v. Florida, 399 U.S. 78, 79 n. 5 (1970) (where the Florida Supreme Court was without jurisdiction to entertain an appeal, "the District Court of Appeal became the highest court from which a decision could be had."); Florida Star v. B.J.F., 530 So.2d 286, 288 n.3 (Fla. 1988). Therefore, the court's jurisdiction is invoked under 28 U.S.C 1257(a).

In 1980, Article V of the Florida Constitution was amended to divest the Florida Supreme court of jurisdiction to review a PCA without a written opinion. In 1993, the Honorable Judge Gerald B. Cope, Jr., of the Third District Court of Appeal, published an extensive article analyzing Florida's Appellate Procedure after the 1980 Amendment. Gerald B. Cope Jr,. Discretionary Review of the Decisions of Intermediate Appellate Courts. A Comparison of Florida's System with Those of the Other sates and the Federal System, 45 Fla. L. Rev. 21 (Jan 1993). Judge Cope concluded that Florida's written opinion requirement was enacted in a time of crisis and imposed "the most severe limitation on access to the State Supreme court of any American jurisdiction" Id. At 93.

Two decades after the 1980 amendment, the Florida Supreme court commissioned a report to study the use of PCA decisions. See, Comm. On Per Curiam Affirmed Dec., Final Report and Recommendations (May 2000). The majority reported that the PCA performs a useful function when used properly. Id. At 29. However, several practitioners cited a widespread PCA problem which appears arbitrary and undermines the quality of appellate justice in Florida. Id. The Florida Supreme Court adopted the PCA Committee's recommendation to amend Rule 9.330 of Florida's Appellate Procedure to allow litigants to request a written opinion from the Court effective January, 2003.

Former Florida Supreme Court Justice England also concluded this amendment to Rule 9.330 is conceptually flawed and should be repealed. Arthur J. England, Jr., Asking for Written Opinion from a Court That Has Chosen Not to Write One, 78-Mar Fla. B. J. 10, 16 (March, 2004). Justice England saw the procedural infirmity in "asking a District Court to provide an opinion that will expose their rationale to Supreme Court review puts expressly in the hands of the District court judges the discretion to allow or not allow review.: Id. At 15.

It is "fundamental black letter law" that a District Court should write an opinion unless "the points of law raised are so well settled that a further writing would serve no useful purpose." Elliot v. Elliot, 648 So. 2d 137, 138 (Fla. 4th DCA 1994).

Due Process protects against the arbitrary deprivation of property and reflects the value our constitutional and political history places on the right to enjoy prosperity, free of governmental interference. Fuentes v. Shevin v, 407 U.S. 67, 80-1, 92 S. Ct. 124, 129 (1921). Chief Justice Taft Wrote:

> Our whole system of law is predicated on the general fundamental principle of equality of application of the law. All men are equal before the law,' This is a government of laws and not of men,' 'No man is above the law,' are all maxims showing the spirit in which Legislatures, executives and courts

are expected to make, execute and apply laws." Id. The guaranty of due process " was aimed at undue favor and individual or class privilege...Id.

This is why "Equal Justice Under Law" is etched in call caps across the front of the U. S. Supreme Court. "The vague contours of the Due Process Clause do not leave judges at large." Rochin v. People of California, 342 U.S. 165, 170, 72 S.Ct. 205, 209 (1952). Judges have long been required to give a public reasoned opinion from the bench in support of their judgment.

This Court is asked to review the Second DCA's opinion below which is clearly pretextual, arbitrary, and violates Petitioner's due process rights. If the Florida Supreme court won't speak out to correct this miscarriage of justice, this Honorable Court is all that is left to protect Petitioner's due process rights enshrined in the 5th and 14th amendments to the U.S. Constitution. This Court instructs:

Whether acting through its judiciary or through its legislature, a State may not deprive a person of all existing remedies for the enforcement of a right, which the State has no power to destroy, unless there is, or was, afforded to him some real opportunity to protect it." Brinkerhoff-Faris Trust & Sav. Co. v. Hill, 281 U.S. 673, 50S Ct. 451, 74L. Ed. 1107 (1930). At 681-682, 50S. Ct., at 454-455.

Pursuant to rules of Appellate procedure 9.330

On, July 15, 2019, petitioner Owens asked for a written opinion to get an understanding on why the cases were affirmed and rehearing was denied. Petitioner Owens believe that the second DCA will let time the appeal time run out before they reply back to Owens motion and it will be "Denied" without a written opinion

STATEMENT OF CASE

Owens has been victimized for years by a corrupt system of judicial misconduct in the Florida Courts. The clear conflict of interest that involves the current administrative judges of the Polk County Florida Court. Officers of Polk County court have perpetrated an unconscionable scheme to criminally defraud the United States Government and willfully deprive citizens of their Constitutional rights for the sole intent of unlawful financial gain. The Respondents named in this case have conspired to commit fraud by and through the establishment and enforcement of fraudulent child support orders that were created with complete disregard of evidence and fact. The bad actors within the court have devised this scheme to inflate the incomes of obligors which in turn would increase the revenues available to the court through Title IV-D funding. Establishment and enforcement tactics used have discriminated against Owens on the basis of his gender and disabilities, the court has systematically deprived Petitioner of his civil rights during contempt and child custody proceedings. Title IV-D is state law that has given officers of the court the incentive to abuse their power under color of law to cause irreversible harm to countless individuals and families. Quite apart from the guarantee of equal protection, if a law impinges on a fundamental right explicitly or implicitly secured by the Constitution it is presumptively unconstitutional.

Florida child support process created by its legislature is in violation of the separation of powers administrative process included procedures for uncontested and contested cases. In uncontested cases, the agency prepared a proposed support order for the parties' signature and the administrative law judge's ratification. If either party contested the proposed order, the case moved into the contested process. In the contested process, the case was presented by a child support officer (CSO) who was not an attorney. The administrative law judge (ALJ) had judicial powers, including the ability to modify judicial child support orders. While the ALJ could not preside over contested paternity and contempt proceedings, he or she

could grant stipulated contempt orders and uncontested paternity orders. While recognizing the importance of streamlining child support mechanisms, the administrative structure violated separation of powers for three reasons. First, the administrative process infringed on the district court's jurisdiction in contravention to the Florida Constitution. Second, ALJ jurisdiction was not inferior to the district court's jurisdiction, as mandated by the Florida Constitution. Third, the administrative process empowered non-attorneys to engage in the practice of law, infringing on the court's exclusive power to supervise the practice of law.

The parties divorced in 2015 and a child support judgment was entered against Owens, whom filed numerous motions for relief from the final judgment. In Owens motion, he accused Saddlers of committing fraud upon the court by misrepresenting and omitting material facts in her financial affidavits. Pursuant to Florida Rule of Civil Procedure 1.540(b)(3), it was "the product of a fraudulent financial affidavit filed by Saddlers. Owens alleged Saddlers made material misrepresentations regarding her assets and income in her 2014 and 2016 financial affidavits.

Owens appealed four of the L.T decisions on 6/29/18 from an order dismissing with prejudice supplemental petition for modification of child support. Then, on 7/18/18, Owens appealed an order denying former husbands "Motion contesting wage garnishment/bank levy/motion to have final judgment of dissolution set aside and order denying former husband's motion to disqualify. On 8/8/2018, Owens appealed order prohibiting further filings without the representation of licensed Florida Attorney for abuse of Judicial Resources.

1.) Owens filed a "Motion for Civil Contempt/Enforcement" on November 3, 2017 a hearing was held on February 15, 2018 in that hearing Owens explained to the court that in the mediation agreement, it specifically stated that the ex-wife must provide documents to Owens because he believed that the ex-wife falsified her financial statements to receive more child support money. She never produced the documents, Owens had to visit different entities to obtain the documents. Owens was trying to show the court that the agreement was not being followed on the ex-wife behalf and she should have been held in contempt of court at the hearing. The judge was biased to the findings and explained that there was an upcoming modification hearing, so, he denied the contempt to court. The judge did not follow Florida Rules properly, due to when fraud is presented, it is an automatic ground for an evidential hearing.
1Fla. R. App. P. 9.040(c) ("If a party seeks an improper remedy, the cause shall be treated as if the proper remedy had been sought . . . .").

2.) Owens made aware in his notice of appeal that there was never a wage garnishment hearing. He asked the court to investigate the L.T docket to prove that there was not a hearing set for garnishment of the wages.

3.) Owens explained to the Second District Court of Appeal that there was a bank levy hearing on On December 21, 2017. He also explained that he put in an objection the same day of the hearing because due process was not followed prior to the hearing there was no notice sent to Mr. Owens for the hearing. The reason he petitioned the court for a hearing is because he learned that his bank account has been levied. Once he contacted the bank, he was informed that a $6,006.70 hold was placed on his account. There was no hearing for a bank levy before the hold was placed.

Therefore that was a violation of Owens due process. 1Fla. R. App. P. 9.040(c) ("If a party seeks an improper remedy, the cause shall be treated as if the proper remedy had been sought . . . .").

4.) Owens is entitled to Florida Rule of Civil Procedure 1.540(b) provides "(b) Mistakes; Inadvertence; Excusable Neglect; Newly Discovered Evidence; **Fraud**; etc. On motion and upon such terms as are just, the court may relive a party or a party's legal representative from a final judgment... for the following reasons... (3) fraud (whether heretofore denominated intrinsic or extrinsic), misrepresentation, or other misconduct of an adverse party; ... The motion shall be filed within a reasonable time, and for reasons (1), (2), (3) not more than 1 year after the judgment, decree, order, or proceeding was entered or taken. "
Florida Family rules of Civil Procedure 12.540 (a) provides that there should be no time limit for motions filed to have a decree judgment set aside because of fraudulent financial affidavits.

5.) Owens has asked Judge Michael P. McDaniel to recuse himself multiple times due to Owens never get a fair hearing and Owens explained in the multiple request that Michael P. McDaniel is biased and also has a financial interest in the case

6.) On the order prohibiting Owens of filing any motions into the court without a Florida lawyer, is and should be considered by the court to be void due to there never was a show cause hearing.

REASONS FOR GRANTING THIS WRIT OF CERTIORARI

Petitioner is going to keep this short and simple with reasons and exhibits

6/29/18 from an order dismissing with prejudice supplemental petition for modification of child support **Reason 1**

Owens filed a "Motion for Civil Contempt/Enforcement" on November 3, 2017 a hearing was held on February 15, 2018 in that hearing Owens explained to the court that in the mediation agreement, it specifically stated that the ex-wife must provide documents to Owens because he believed that the ex-wife falsified her financial statements to receive more child support money. She never produced the documents, Owens had to visit different entities to obtain the documents. Owens was trying to show the court that the agreement was not being followed on the ex-wife behalf and she should have been held in contempt of court at the hearing. The judge was biased to the findings and explained that there was an upcoming *child support modification hearing*, so, he denied the contempt to court. The judge did not follow Florida Rules properly, due to when fraud is presented, it is an automatic ground for an evidential hearing.

1Fla. R. App. P. 9.040(c) ("If a party seeks an improper remedy, the cause shall be treated as if the proper remedy had been sought . . . .").

In 2015 2016 2017 2018, this evidence was presented to Judge Michael P. McDaniel. While broad, the trial court's discretion is not unlimited. The [trial] judge must consider the proper mix of factors and juxtapose them reasonably. "Abuse occurs when a material factor deserving significant weight is ignored, when an improper factor is relied upon, or when all proper and no improper factors are assessed, but the court makes a serious mistake in weighing them." Independent Oil and Chemical Workers of Quincy, Inc. v. Procter & Gamble Mfg. Co., 864 F.2d 927, 929 (1st Cir. 1988); see also Anderson v. Cryovac, Inc., 862 F.2d 910, 923 (1st Cir. 1988) (to warrant reversal for abuse of discretion, it must "plainly appear[ ]

that the court below committed a meaningful error in judgment"). There was no proper evidentiary hearing. Michael P. McDaniel ignored the information provided about the fraud.

Further, denial of a Rule 1.540(b) motion without an evidentiary hearing is automatically an abuse of discretion as a matter of law. See Schleger v Steelsky, 957 So. 2d 71 (Fla. 4th DCA 2007); Stella v. Stella, 418 So. 2d 1029 (Fla. 4th DCA 1982); Robinson v. Weiland, 936 So. 2d 777 (Fla. 5th DCA 2006) (evidentiary hearing requirement applies when fraud is asserted as a ground for relief under Rule 10540(b)); Southern Bell Tel & Tel. Co. v. Welden, 483 So. 2d 487, 489 (Fla. 1st DCA 1986) (holding that the trial court erred because "where the moving party's allegation to rule 1.540(b)(3) relief, a formal evidentiary hearing on the motion, as well as permissible discovery prior to the hearing, is required.").

order denying former husbands "Motion contesting wage garnishment/bank levy/motion to have final judgment of dissolution set aside Reason 2

Pursuant to due process, Article One, Section Nine of the Florida Constitution provides that "No person shall be deprived of life, liberty, or property without due process of law,..." Article One of the Florida constitution also contains other important provisions including Section Two regarding the basic rights of all Florida citizens to be treated equally before the law and to have inalienable rights, among which are the right to enjoy and defend life and liberty, to pursue happiness, to be rewarded for industry, and to acquire, possess and protect property. Other sections of Article One cover subjects such as Religious Freedom (section three); Freedom of Speech and Press (section four); the right to assemble (section five); the right to have open access to the state's courts for redress of any injury (section twenty-one), and the right to privacy (section twenty-three) which provides that every natural person has the right to be let alone an free from governmental intrusion into the person's private life except as otherwise proved herein.

While there is no single, inflexible test by which our courts decide whether the requirements of procedural due process have been met, fundamentally it has been defined by the Courts to mean a structure of laws and procedures that hears before it condemns and proceeds upon inquiry and renders a judgment after trial. See Watson v. Pest Control commission of Florida, 199 So2nd 777 (4th DCA, 1967). The constitutional guarantee of due process extends to every type of legal proceeding. See Pelle v. Dinners Club, 287 So2nd 737, (Fla. DCA 3rd Dist 1974); Tomayko v. Thomas, 143 So2nd 227 (Fla. 3rd DCA, 1962); State ex rel. Barancik v. Gates, 134 So2nd 497 (Fla.1961); Williams v. Kelly, 133 Fla. 244, 182 So. 881 (1938). It cannot be simply ignored by labeling the proceedings as merely "quasi-judicial" or administrative. Nor can it be merely colorable or illusory. See Ryan's Furniture Exchange v. McNair, 120 Fla 109, 162 So. 483 (1935). Nor can it be a mere sham or pretense, Robbins v Robbins, 429 So2nd 424, 3rd DCA (1983). As outlined in the case of Neff v. Adler, 416 So2nd 1240 at 1242-43 (Fla 4th DCA 1982) the fundamentals of procedural due process include a hearing before an impartial decision-maker, after fair notice of the charges and allegations with a fair opportunity to present one's own case. Fundamental due process includes the duty of the individual presiding over the hearing to apply a correct principle of law or rule, see State v. Smith, 118 So2nd 792_(Fla. 1st DCA, 1960). Unfortunately, none of these fundamental requirements were met in the underlying proceedings.

On 6/20/2018, Owens sent in a motion contesting wage garnishment. bank levy/ Motion to have Final Judgment of Dissolution set aside to the L.T. Court in On 7/10/2018 The judge denied the motion without a hearing,

(1) There was never a hearing for wage garnishment.
(2) December 21, 2017 There was a hearing set for contesting bank levy and drivers license suspension. Owens sent a motion contesting bank levy and drivers license suspension on 10/06/2017.There was no proper notice of the intent to suspend the drivers license and issue of a

bank levy sent to Owens. On August 24, 2017, while Owens was at work, he purchased an item from a store and it was declined. Owens reached out to the bank to get an understanding of the issue and customer service advised of hold that was placed on the account from the Department of Revenue. At the hearing, Owens advised the hearing officer that his due process rights were violated due to not receiving proper notice of the intent to suspend drivers license and place a bank levy on his account. The hearing officer ignored the issue. The best part of this case is that it was recorded by the courts and Owens obtained a copy of the recording, so, there is proof of the due process violation argument.

Generally, a judgment entered without service on the parties or other notice violates the parties' due process rights and is void. See Stevens v. Nationstart Mortg., LLC, 133 So.3d 628, 629 (Fla. 5th DCA 2014) ("Every pleading and paper filed in any court proceeding must be served on each party or their counsel. This requirement is to satisfy the constitutional requirement of due process.: (citing Fla. R. Jud. Admin. 2.516)) Viets v. Am. Recruiters Enters., Inc., 922 So.2d 1090, 1095 (Fla. 4th DCA 2006) ("A violation of the due process guarantee of notice and an opportunity to be heard renders a judgment void.") The essence of due process is that fair notice and a reasonable opportunity to be heard must be given to interested parties before judgment is rendered. Tibbetts v. Olson, 91 Fla. 824, 108 So. 679 (1926). Due process envisions a law that hears before it condemns, proceeds upon inquiry, and renders judgment only after proper consideration of issues advanced by adversarial parties. State ex rel. Munch v. Davis, 143 Fla. 236, 244, 196 So. 491, 494 (1940). In this respect the term "due process" embodies a fundamental conception of fairness that derives ultimately from the natural rights of individuals.

(3) The issue in having the final judgment of dissolution set aside is because Saddlers falsified certain amounts on her financial affidavit for the daycare expenses. When childsupport was calculated, they based it on her financial affidavit that she signed under penalty of perjury, constitutes actionable fraud under Rule 12.540, Florida Family Law Rules of Procedure. After the cases were affirmed, Owens filed a rehearing on May 28, 2019 hitting at a valuable issue that he pointed out in the notice of appeal that the court ignored about the fraudulent financial affidavits hoping to save the case.

Point 1: The decision below of the Second District Court of Appeal expressly and directly conflicts with the decision of the Florida Supreme Courts in Macar v. Macar, 803 So.2D 707 (Fla. 2001). By ignoring its implication on this decision, the Second District Court of Appeal has eliminated any effective remedy against a party for filing a false financial affidavit in connection with a modification of alimony. The very purpose and reason for filing a financial affidavit is destroyed and any fear that a party might have to falsify a financial affidavit is eliminated.

Point 2: The decision below of the Second District Court of Appeal expressly and directly conflicts with the decision of the Florida Supreme Court in Cerniglia v. Cerniglia, 679 So2D 110 (Fla. 1996), and Declaire v. Yohanan, 453 So.2d 375 (Fla. 1984). In the present case, the Second District Court of Appeal completely ignored this point and confined its decision by stating: AFFIRMED.

This decision is in direct conflict with the Florida Supreme Court decision in both Cerniglia v. Cerniglia, 679 So.2d 1160 (Fla. 1996), and DeClaire v. Yohanan, 453 So.2d 375 (Fla. 1984), as to what constitutes actionable intrinsic fraud under Rule 1.540 and Rule 12.540 with respect to a financial affidavit. Here, Saddlers financial affidavit was false; as it exaggerated daycare expenses in three different financial affidavits. In the mediation agreement, it specifically state that Saddlers shall provide documentation as to why she will no longer be eligible for daycare assistance because she stated that daycare was $480.

Owens knew that she could have been lying at the time, so, he made sure that it was in the agreement. The documents were never provided to Owens. Saddlers was not trustful with the court.

In DeClaire, supra, the trial court "found" that the financial affidavit executed by the petitioner was false, in that it did not accurately reflect the petitioners assets and liabilities net worth at the time of dissolution. In reviewing the principle of intrinsic fraud, The Florida Supreme Court held: "This court, consistent with the general rule, has expressly held that false testimony given in a proceeding is intrinsic fraud The Florida Supreme Court also reaffirmed this principle in Cerniglia supra The Florida Supreme Court in DeClaire went on to explain "When an issue is before a court for resolution and the complaining party could have addressed the issue in the proceeding, such as attacking the false testimony or misrepresentation through cross-examination and other evidence, then the improper conduct, even though it may be perjury, is intrinsic fraud and an attack on a final judgment based on such fraud must be made within one year of the entry of the judgment... DeClaire, at p. 380; Cerniglia, at p. 1163. In the present case, Saddlers falsified expenses on her financial affidavit which she executed under penalties of perjury, is a finding and proof that Saddlers submitted fraudulent financial affidavits. It constitutes intrinsic fraud under DeClaire and Cerniglia. Under Rule 12.540, there is no time limitation as to when this action can be filed. Here, in direct and open conflict with DeClaire and Cerniglia, the Second District Court of Appeal has ruled that no abuse of discretion was found.

Under Florida law, "fraud on the court" is where "a party has sentiently set in motion some unconscionable scheme calculated to interfere with the judicial system's ability impartially to adjudicate a matter by improperly influencing the trier of fact or unfairly hampering the presentation of the opposing party's claim or defense." Cox v. Burke, 706 So. 2d 43, 46 (Fla. 5th DCA 1998) (quoting Aoude v. Mobil Oil Corp., 892 F.2d 1115, 1118 (1st Cir. 1989)). A dismissal for fraud on the court must be supported by clear and convincing evidence. Gautreaux v. Maya, 112 So. 3d 146, 149 (Fla. 5th DCA 2013) (citing Perrine v. Henderson, 85 So. 3d 1210, 1212 (Fla. 5th DCA 2012))

Proof of fraud: See exhibits.

Exhibit 1: Proof that Mr. Owens addressed the issue back in April 2, 2015 that the wife falsified the incorrect daycare cost on her financial affidavit. Mr. Owens was not knowledgeable on appeals at the time; therefore, he wrote a letter to Judge Abdoney.

Exhibit 2: Proof that Ms. Saddlers testified in mediation that she will no longer qualify for Arbor. Dated April 16, 2015. The ELC certificate had a termination date of May 22, 2015. Please look over that notice to see that Mrs. Saddlers has other open child support cases in did not report that as income on her financial affidavits

Exhibit 3: Ms. Saddlers financial affidavit filed December 1, 2014 on the previous Dissolution of marriage case 2014-DR-9269. At the time, she stated that she was paying $320 for daycare.

Exhibit 4, 5, and 6: Proof of the actual daycare costs.

8/18/2014-11/22/2014 totals $4.80 for Lariah Owens

01/10/2015 – 05/22/2015 totals $5.60 for Lariah Owens

8/26/2015 – 11/22/2015 totals $8.00 for Lariah Owens

Exhibit 7: Proof that Ms. Saddlers was supposed to provide documentation on the reason she would no longer receive daycare assistance. That order was entered on July 15, 2015.

Exhibit 8: Proof that Ms. Saddlers testified that when child support was calculated, it was understood that when she began receiving child support, she would no longer be eligible to receive daycare assistance. She continued to receive assistance after the child support order was entered because the father had not started paying. Record reflected Mr. Owens made first payment on November 3, 2015.

Exhibit 9:ELC recertification for daycare assistance. Ms. Saddlers recertified for assistance and state that court order not received. Dated November 18, 2015.

Exhibit 10: Ms. Saddlers 2016 Income financial affidavit stated she was paying $480 in daycare fees. Please let the record reflect that Ms. Saddlers stated under penalty for perjury at signing. The statement that she signed under stated: "I am aware that any materially false statement knowingly made with the intent to defraud or mislead shall subject me to the penalty for perjury and may be considered a fraud upon the court." Dated 3/21/2016

Exhibit 11: Proof of actual costs of $4.80 for Lariah Owens

Exhibit 12: Payments to Ms. Saddlers

Exhibit 13: ELC Termination for 3/25/16

Exhibit 14, 15, and 16: Statements from Ms. Saddlers where she openly admitted to more false material stating she was paying $20 a week to paying $120 a week for Lariah Owens.

Exhibit 17 and 18: Proof of payments March 28, 2016 to July 28, 2017 paying $100 for Lariah Owens a week.

In every hearing, Ms. Saddlers was under oath. Her statements were taken as true and child support calculation were determined based on false statements. The crime of perjury committed in a judicial proceeding is condemned by Section 837.02, Florida Statutes, F.S.A. The crime of subordination of perjury is condemned by Section 837.03, Florida Statutes, F.S.A. The crimes are not clearly defined by the statutes. We, therefor, look to cases and the common law for definitions. In Wharton's Criminal Law and procedure, Vol. 3, Sec. 1290, we find the following:

"At common law perjury was (1) the willful (2) giving of false testimony (3) on a material point (4) in a judicial proceeding, (5) by a person to whom a lawful oath had been administered."

Owens will like for the court to take judicial notice let the record reflect that Owens compel to show proof of his income by turning in W2s and paystubs if he did not follow the instructions he will be held in contempt of court.

A spouse may set aside or modify an agreement by establishing that it was reached under fraud, deceit, duress, coercion, misrepresentation, or overreaching. Masilotti v. Masilotti, 158 Fla. 663, 29 So2d 872 (1947); Hahn [v. Hahn, 465 So.2d 1352 (Fla. 5th DCA 1985)]; O'Connor [v. O'Connor, 435 So.2d 344 (Fla. 1st DCA 1983)].

The Second District Court of Appeal is prohibited from not following decisions of the Florida Supreme Court See Hoffman v. Jones, 280 So. 2d 431 (Fla. 1973)

Trial courts have the inherent authority to dismiss an action as a sanction when it learns that a plaintiff has perpetrated a fraud on the court Morgan v. Campbell 816 So. 2d 251, 253 (Fla 2d DCA 2002). This authority exists because "no litigant has a right to trifle with the courts.' Id. (citing Tri Star Invs. v. Miele, 407 So. 2d 292, 293 (Fla. 2d DCA 1981) Although trial courts have the inherent authority to dismiss

actions based on fraud and collusion, that power should be used "cautiously and sparingly" and only upon the most blatant showing of fraud pretense, collusion or other similar wrong doing. Granados v. Zehr, 979 So.2d 1155 (Fla 5th DCA 2008).

Courts act cautiously in dismissing on the basis because the Florida Constitution guarantees that the courts "will be available to every person for redress of injury" Id. (citing Art 1, 21, Fla. Const). Thus, to ensure that this guarantee is satisfied, a party alleging fraudulent behavior on the part of another party must prove its position by clear and convincing evidence. (citing Distefano v. State Farm Mut. Auto Ins. Co., 846 So. 2d 572, 574 (Fla. 1st DCA 2003) in Cox v Burke, 706 So. 2d 43, 46 (Fla. 5th DCA 1989)

But the judge did not apply this authority to Owens case

The order denying former husband's motion to disqualify should have been "GRANTED" And order prohibiting further filings without the representation of licensed Florida Attorney for abuse of Judicial Resources. Should not have been ISSUED OUT BECAUSE THERE WAS NOT A SHOWCAUSE HEARING Reason 3

45 §302.34 Cooperative arrangements.

The State plan shall provide that the State will enter into agreements, which are reflected in a record, for cooperative arrangements under § 303.107 of this chapter with appropriate courts; law enforcement officials, such as district attorneys, attorneys general, and similar public attorneys and prosecutors; corrections officials; and Indian Tribes or Tribal organizations. Such arrangements may be entered into with a single official covering more than one court, official, or agency, if the single official has the legal authority to enter into arrangements on behalf of the courts, officials, or agencies. Such arrangements shall contain provisions for providing courts and law enforcement officials with pertinent information needed in locating noncustodial parents, establishing paternity and securing support, to the extent that such information is relevant to the duties to be performed pursuant to the arrangement. They shall also provide for assistance to the IV-D agency in carrying out the program, and may relate to any other matters of common concern. Under matters of common concern, such arrangements may include provisions for the investigation and prosecution of fraud directly related to paternity and child and spousal support, and provisions to reimburse courts and law enforcement officials for their assistance.

If a state delegates it's disbursement functions to local governments it must reward the most efficient local agencies with a share of federal incentive payments See 42 USC 654 (22) this leads to torts and a prejudice judge

The Respondent is entitled as a matter of due process to have a decisions maker that is impartial. See for instance the case of Hayslip v Douglas, 400 So2d 553 (Fla 4th DCA 1981). This Referee was anything but impartial and the Respondent made a valid motion pursuant to the Bar rules such as Rule 3-7.6(h)(B)(8) to have the Referee disqualified. As indication in the motion to recuse, the respondent had a sincere, well founded conviction that the Referee was biased and prejudiced against him and would not be able to set aside his personal bias in this matter. The record documents the unmistakable effects of the Referee's prejudice throughout the proceedings. This motion should have been granted but was not because of the preconceived bias of the referee against the respondent and the referee's personal interest in retaining control over the proceedings.

Florida Rules of Judicial Administration 2.330 governs the disqualification of county and circuit trail judges. See Fla. R Jud. Admin. 2.330. The rule states that any party may file a motion to disqualify the trial judge assigned to the case on any ground provided by rule, Statute, or the Code of Judicial Conduct.

See id . The rule mandates that the motion shall, inter alia, allege specifically the facts and reasons upon which the movant relies as the grounds for disqualification and that the party fears that he/she will not receive a fair trial or hearing because of specifically described prejudice or bias of the judge.

The backdrop of the motion to disqualify is illuminated in the preamble of the Code of Judicial Conduct that states "Our legal system is based on the principle that an independent, fair and competent judiciary will interpret and apply the law that govern us. Fla. Code Jud. Conduct Preamble. Additionally, Canon 2 states that a "judge shall avoid impropriety and the appearance of impropriety in all of the judges activities. Further Canon 2A states that a judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary. Canon 2A is reinforced by Canon 3B(2) and 3C(1)'s mandates that a judge shall be faithful to the law and maintain professional competence in it. A judge shall diligently discharge the judge's administrative responsibilities without bias or prejudice and maintain professional competence in judicial administration. Finally the test for appearance of impropriety is whether the conduct would create in reasonable minds with knowledge of all the relevant circumstances that a reasonable inquiry would disclose a perception that the judge's ability to carry out judicial responsibilities with integrity, impartiality, and competence is impaired.

Rule 2.330 does not state exactly what can and can not be stated or how to describe the specific fear faced by the party. An analysis of Owens verified Motion to Disqualify demonstrates that Owens alleged that he had a fear of bias and that judge Michael P. McDaniel had an interest in the case.

A judge or magistrate's competence is always an issue in a proceeding since a judge or magistrate who is ignorant of the law can not afford due process. See Treiman at 823. A judge is required to be competent pursuant to Canon 3B(2) and 3C(1).

Owens filed a "Motion for Civil Contempt/Enforcement" on November 3, 2017 a hearing was held on February 15, 2018 in that hearing Owens explained to the court that in the mediation agreement, it specifically stated that the ex-wife must provide documents to Owens because he believed that the ex-wife falsified her financial statements to receive more child support money. She never produced the documents, Owens had to visit different entities to obtain the documents. Owens was trying to show the court that the agreement was not being followed on the ex-wife behalf and she should have been held in contempt of court at the hearing. The judge was biased to the findings and explained that there was an upcoming modification hearing, so, he denied the contempt to court. The judge did not follow Florida Rules properly, due to when fraud is presented, it is an automatic ground for an evidential hearing.

In 2015 2016 2017 2018, this evidence was presented to Judge Michael P. McDaniel. While broad, the trial court's discretion is not unlimited. The [trial] judge must consider the proper mix of factors and juxtapose them reasonably. "Abuse occurs when a material factor deserving significant weight is ignored, when an improper factor is relied upon, or when all proper and no improper factors are assessed, but the court makes a serious mistake in weighing them." Independent Oil and Chemical Workers of Quincy, Inc. v. Procter & Gamble Mfg. Co., 864 F.2d 927, 929 (1st Cir. 1988); see also Anderson v. Cryovac, Inc., 862 F.2d 910, 923 (1st Cir. 1988) (to warrant reversal for abuse of discretion, it must "plainly appear[ ] that the court below committed a meaningful error in judgment"). There was no proper evidentiary hearing. Michael P. McDaniel ignored the information provided about the fraud.

Further, denial of a Rule 1.540(b) motion without an evidentiary hearing is automatically an abuse of discretion as a matter of law. See Schleger v Steelsky, 957 So. 2d 71 (Fla. 4th DCA 2007); Stella v. Stella, 418 So. 2d 1029 (Fla. 4th DCA 1982); Robinson v. Weiland, 936 So. 2d 777 (Fla. 5th DCA 2006) (evidentiary hearing requirement applies when fraud is asserted as a ground for relief under Rule

10540(b)); Southern Bell Tel & Tel. Co. v. Welden, 483 So. 2d 487, 489 (Fla. 1st DCA 1986) (holding that the trial court erred because "where the moving party's allegation to rule 1.540(b)(3) relief, a formal evidentiary hearing on the motion, as well as permissible discovery prior to the hearing, is required.").

Order prohibiting further filings without the representation of licensed Florida Attorney for abuse of Judicial Resources **Reason4**

Owens appeals the order sanctioning him for allegedly filing frivolous pleadings by forbidding him from filing further pro se papers in his case and any other case in which he is a litigant. the Second District Court of Appeal should of treated Owens appeal as a petition for writ of certiorari.1 See, e.g., Owens v. Forte, 135 So. 3d 445, 445-46 (Fla. 2d DCA 2014)

1Fla. R. App. P. 9.040(c) ("If a party seeks an improper remedy, the cause shall be treated as if the proper remedy had been sought . . . .").

(reviewing order precluding a party from filing further pro se pleadings through certiorari); Balch v. HSBC Bank, USA, N.A., 128 So. 3d 179, 181 (Fla. 5th DCA 2013) (concluding that an order sanctioning a pro se litigant and prohibiting future pro se filings is not a final, appealable order and converting the appeal to a petition for writ of certiorari); Epps v. State, 941 So. 2d 1206, 1206-07 (Fla. 4th DCA 2006) (reviewing order precluding a party from filing further pleadings pro se through certiorari); Favreau v. Favreau, 940 So. 2d 1188, 1189 (Fla. 5th DCA 2006) (treating notice of appeal of order barring further pro se pleadings as a petition for writ of certiorari)

As noted above, while Owens filed a notice of appeal directed to the sanctions order, the Second District Court of Appeal should have treated this appeal as a petition for writ of certiorari. So Owens could be entitled to the issuance of such a writ, Owens must show "(1) a departure from the essential requirements of the law, (2) resulting in material injury for the remainder of the case (3) that cannot be corrected on postjudgment appeal." Williams v. Oken, 62 So. 3d 1129, 1132 (Fla. 2011) (quoting Reeves v. Fleetwood Homes of Fla., Inc., 889 So. 2d 812, 822 (Fla. 2004)). The departure from the essential requirements of the law sufficient to warrant relief through certiorari is something more than simple legal error. Instead, "[a] district court should exercise its discretion to grant certiorari review only when there has been a violation of a clearly established principle of law resulting in a miscarriage of justice." Allstate Ins. Co. v. Kaklamanos, 843 So. 2d 885, 889 (Fla. 2003) (citing Ivey v. Allstate Ins. Co., 774 So. 2d 679, 682 (Fla. 2000)). Such a miscarriage can occur when a party's due process right to notice and an opportunity to be heard has been abridged by the court. See, e.g., Presidio Networked Sols., Inc. v. Taylor, 115 So. 3d 434, 435 (Fla. 2d DCA 2013) (noting that the trial court's failure to provide notice and opportunity to be heard to Presidio was a "complete denial of due process" sufficient to "constitute[] the type of irreparable harm that is subject to certiorari review"); K.G. v. Fla. Dep't of Children & Families, 66 So. 3d 366, 368-69 (Fla. 1st DCA 2011) (holding that the court's failure to afford the mother an opportunity to be heard at the shelter hearing constituted a departure from the essential requirements of the law sufficient to be subject to review by certiorari).In the context of sanctioning a pro se litigant by barring further pro se pleadings, the supreme court has recognized that there must be a balance between a litigant's right of access to the courts and any abuse of that process.

We have recognized the importance of the constitutional guarantee of citizen access to the courts, with or without an attorney. See, e.g., Rivera [v. State], 728 So. 2d [1165] at 1166 [(Fla. 1998)]; Attwood [v. Singletary], 661 So. 2d [1216] at 1217 [(Fla. 1995)]; see also art. I, § 21, Fla. Const. ("The courts shall be open to every person for redress of any injury. . . ."). Thus, denying a pro se litigant the opportunity to file

future petitions is a serious sanction, especially where the litigant is a criminal defendant who has been prevented from further attacking his or her conviction, sentence, or conditions of confinement, as in Spencer and Huffman.

However, any citizen, including a citizen attacking his or her conviction, abuses the right to pro se access by filing repetitious and frivolous pleadings, thereby diminishing the ability of the courts to devote their finite resources to the consideration of legitimate claims. See Rivera, 728 So. 2d at 1166; Attwood, 661 So. 2d at 1216-17; Martin [v. Circuit Court, Seventeenth Judicial Circuit], 627 So. 2d [1298] at 1300 [(Fla. 4th DCA 1993)].

State v. Spencer, 751 So. 2d 47, 48 (Fla. 1999). Thus, "[c]ourts may, upon a demonstration of egregious abuse of judicial process, restrict parties from filing pro se pleadings with the court." Id. at 47; see also Martin v. Dist. of Columbia Court of Appeals, 506 U.S. 1, 3 (1992) (recognizing the court's inherent authority to sanction vexatious litigants).

However, to balance the pro se litigant's right of access against the need of the courts to prevent abusive filings, the court must provide the pro se litigant with notice and an opportunity to be heard before such a sanction may be imposed. Spencer, 751 So. 2d at 48. And this due process requirement applies to litigants involved in civil proceedings as well as criminal ones. See, e.g., Lomax v. Taylor, 149 So. 3d 1135, 1136 n.2 (Fla. 2014) (citing Spencer as providing the required procedure before sanctioning a litigant in a civil case); Riethmiller v. Riethmiller, 133 So. 3d 926, 926 n.3 (Fla. 2013) (same); Delgado v. Hearn, 805 So. 2d 1017, 1018 (Fla. 2d DCA 2001) (applying the Spencer standard to civil litigants).

Please see Exhibit A,B,C D

On July 17,2018, Owens filed a motion for recusal and a notice asking that Michael P. McDaniel recuse himself from the case. Under Florida Rules of Judicial Administration 2.330 governs disqualification of a circuit judge. A hearing was set for Aug 30th 2018 Owens thought that the judge was trying to reopen a pass hearing to hold Owens in contempt of court If he had known that the hearing was for a show cause, for the notice in recusal then he would have attended the hearing under fear that if not he would have been held in contempt to court. The court should have been clear as to what the hearing was for. I would like for the court to take Judicial notice that all of the notice on Owens case has the reason for the hearing. Here, neither the trial court's order nor its docket shows that the court provided Owens with either notice or an opportunity to be heard before it sanctioned him by barring him from filing any further pro se pleadings or papers. By failing to afford Owens his due process right to notice and opportunity to be heard before it imposed

sanctions, the trial court departed from the essential requirements of the law. And while the court did not bar Owens from appearing through counsel, Owens has nevertheless suffered a material injury that cannot be corrected on post judgment appeal in that he is barred from filing any papers on his own behalf in this, or any other, civil case—a right to which he would be otherwise entitled.

For this reason, the Second District Court of Appeal should have quash the sanctions order, and remand for further proceedings.

No Statute of limitations applies to void judgments, SeeHazel-Atlas Co. Id., showing no statute of limitations applies to void judgments, because the case was voided 12 years after the original judgment. See also V. T. A., Inv., v. Airco, Inc. 597 F. 2d 220 (10th Cir. 1979). If a judgment is void, the slate must be wiped clean, Armstrong v. Manzo, 380 U. S. 545, 552 (1962).

Lower federal courts and State courts need guidelines as what the constitutional law is, and not having guidelines can cause extensive litigation as in the case at bar. A good example is the Rooker-Feldman doctrine where this court reigned in Courts of Appeals in the Exxon Mobile Corp., v. Saudi Basic Industries 544 U. S. 280 (2005). In the case at bar the unbridled reigns stopped petitioners void judgment horse. Corruption takes the place of justice when procedural Rules are allowed to be disregarded. Definite guidelines speed up the efficiently of the courts, thereby cutting back on frivolous appeals where parties claim a judgment is void, when in reality it is not, or it may simply be a voidable judgment. This case shows that courts would rather side with large firms by dismissing on a non jurisdictional grounds than siding with a pro se litigant's constitutional rights that have been mandated by this court many times.

It makes sense for this court to reaffirm its past cases every so often, otherwise lower courts can assume that the court has changed its mind or the issue is not important if an issue has not been reaffirmed in decades.

Judge Posner stated that void "lacks a settled or precise meaning, and [t]he standard formulas are not helpful, See In re Edwards 962 F.2d 641, 644 (7th Cir. 1992).

In the 1946 amendment to Rule 60 of the Federal Rules of Civil Procedure, the advisory note stated, "It should be noted that Rule 60(b) does not assume to define the substantive law as to the grounds for vacating judgments, but merely prescribes the practice in proceedings to obtain relief." The issue of void judgments is clearly an issue that needs guidance.

This Court Should Once Again Remind Lower Courts That a Void Judgment Cannot Gain Legitimacy, Therefore Any Issue Trying to Justify the Void Judgment Is Also Void as a Matter of Supreme Court Law
The definition of void ab initio by that definition mandates that a void judgment can never gain legitimacy because it is void from the inception. Therefore this case is simple, if the judgment is void, then all subsequent orders and judgments are void as a matter of law.

The point is, if the judgment is void all other orders and issues are irrelevant and also void. Every issue that happened subsequently to a void judgment is without merit because a void judgment can never gain legitimacy, any argument is also therefore without merit and also void. See Armstrong v. Manzo 380 U. S. 5451 551 552, the slate must be wiped clean when the right to be heard has been denied. With this in mind, the only issue in front of the court is whether or not the judgment is void. Even though the issues are void, because the judgment is void, they will be addressed briefly below to show they were not proper issues before any Court for other reasons.

In the Civil Rights Cases 109 U. S. 3, 11, 17 (1883), this Court pointed out that the Amendment makes void "State action of every kind" which is inconsistent with the guaranties therein contained, and extends to manifestations of "State authority in the shape of laws, customs, or judicial or executive proceedings. Shelley v. Kraemer 334 U. S. 1, at 14. In Brinkerhoff-Faris Trust & Savings. v. Hill, 281 U. S. 673, 680 (1930), this Court, through Mr. Justice Brandeis stated:

The federal guaranteed right of due process extends to state action through its judicial as well as through its legislative executive or administrative branch of government.

The action of state courts in imposing penalties of depriving parties of other substantive rights without providing adequate notice and opportunity to defend, has, of course, long been regarded as a denial of the due process of law guaranteed by the Fourteenth Amendment . . opportunity to defend was put off for another day and another court. Brinkerhoff-Faris Trust & Savings. v. Hill, supra. Cf. Pennoyer v. Neff, 9 5 U.S. 714 (1878).

Rule 60(b)(4) and (d)(1) and (3) of the Federal Rules of Civil Procedure should be addressed and the case at a bar brings this Rule into focus. This Court has provided little guidance on applying Rule 60 for fraud upon the court misrepresentation or void judgments. Of course the reason is that void judgments are rare. In Herring v. United States of America 424 F.3d 384, 386 (3rd Cir. 2005) the court stated, "Actions for fraud upon the court are so rare that this Court has not previously had the occasion to articulate a legal definition of the concept." The court went on to quote some definitions of other circuits in the footnotes. The Court then rejected the Tenth Circuit requirements for a void judgment and went to make their own requirements.

When appellant Courts go through the motions without addressing the major issue of a case prior to their decision, it is unfair. This is especially true when a judgments is void on its face. Without some type of mandate which the Tenth Circuit claims to use justice will not be served and crooked lawyers will prevail.

In everyday life, when a person does not want to talk about a certain subject, they change the subject. How can a litigant feel like the court was fair when the lawyers and judges refuse to address the issue in a pragmatic manner instead of avoiding the void issue like the plague by simply issuing piggyback judgments based on the 2 DCA judgment. In the case at bar if a single judge would have explained the reason for their decision, Petitioner may have felt the proceeding was fair, but of course that never happened, not a single time, nor could they. However all courts state that if a judgment is void it must be addressed. This court set the example in Hazel-Atlas Glass Co. v Hartford-Empire Co., 322 U.S. 238 (1944),

CERTIFICATION

For the four reason this court should grant this writ of certiorari Owens is asking for relief from these Void judgments and he is also asking for this court to compel the lower courts to apply Florida rules 1.540 and 12.540 to his case so that he can have his final judgment of dissolution set aside.

I hereby certify that a true and correct copy of the writ of certiorari has been furnished by email to Toni C Bernstein A Toni.Bernstein@myfloridalegal.com and mail The Capitol Plaza 01 Tallahassee Florida 32399-1050 and to Tamesha Saddlers in the United States mail, with first class postage prepaid addressed to the following : 6017 Hilltop lane E Lakeland on this 20th day of August 2019
Larael Owens