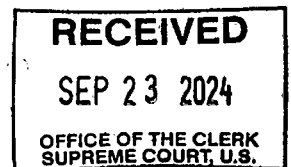


## **APPENDIX A:**

**Florida 7<sup>th</sup> Judicial Circuit - ALL Orders  
– St. Johns Co. Cases: DR21-1577; DR21-  
1650 & CA22-1450. (Dated November 14<sup>th</sup>,  
2023, November 20<sup>th</sup>, 2023, November  
22<sup>nd</sup>, 2023, March 22<sup>nd</sup>, 2024 & September  
13<sup>th</sup>, 2024).....31 Pages**



IN THE CIRCUIT COURT, SEVENTH  
JUDICIAL CIRCUIT, IN AND FOR ST. JOHNS  
COUNTY, FLORIDA

CASE NO.: DR21-1650  
DIVISION: 57

IRYNA ABOUD  
PETITIONER  
AND  
CAMILLE ABOUD  
RESPONDENT

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**ORDER DETERMINING RESPONDENT TO BE A VEXATIOUS LITIGANT AND  
ORDERING COUNSEL**

This matter comes before the court at a pretrial conference set by previous order. The respondent in this case, Camille Abboud, has been representing himself for several months in this litigation. Trial in this case was set for December 21, 2023. See DIN 127.

Counsel for the petitioner Dori Lassiter Young, reported to the court that she was unable to meet with the respondent as required by the court's pretrial order. They were also unable to agree on any element of a joint pretrial stipulation. Consequently, both filed a unilateral pretrial statement.

The respondent filed a lengthy and somewhat rambling pretrial statement. The court reviewed his pretrial statement and sought to determine if a trial would be possible given the scope of the pretrial statement. Among other items, the respondent insists that at the trial, scheduled for one day, he will call witnesses from a list of 47 entries. Many of those entries list multiple names. Some list only initials while others list only a vague description of the witness. (See DIN 192)

In particular, he stated an intent to call three Circuit judges and two County judges as witnesses. He claimed that most of them would provide testimony regarding a Domestic Violence Injunction entered in collateral case DR 21-1577. That case was tried on November 2, 2022, and resulted in a Final Injunction being issued on November 7, 2022 (See DIN 143 in DR 21-1577) During the pendency of that case, he was represented by three different attorneys *in seriatim*. The last counsel withdrew shortly after the final judgment. Shortly after that withdrawal, the Respondent began a series of *pro se* filings directed toward the final judgment. These included a so-called Emergency motion alleging misconduct by the Petitioner's attorney including perjury. (See DIN 160, 164, DR 21-1577) The undersigned, who assumed

responsibility for this Division on January 1, 2023, denied emergency treatment and directed the parties' set the matter for hearing. The Respondent followed up with another "Emergency" motion (DIN 175, DR 21-1577) to reopen the case. That was also denied emergency treatment (DIN 177, DR 21-1577). The Respondent filed yet another motion to reopen (DIN 180, DR 21-1577) having yet failed to set any of his motions for hearing. The Court set that for hearing and noticed the hearing for October 18, 2023.

The substance of his motions, none of which were timely under the Family Rules, was that the predecessor judge's order failed to record accurately her oral pronouncement. The undersigned reviewed the audio recording of that hearing and issued an order on October 18, 2023, denying the motion, finding that the Order issued by the predecessor judge accurately reflected the oral pronouncement.

Two of the judges Respondent suggested as witnesses were genuinely involved in those proceedings. The Respondent sought to subpoena them to appear at the trial on the merits of the dissolution case to explain their actions. He asserts that their testimony would somehow be relevant to his dissolution. It was evident that he merely wished to relitigate the domestic violence case within the dissolution.

The other three judges were involved in several other cases which are tangentially related. One judge conducted first appearance on the Respondent after he was arrested in a criminal case. Another presides over a small claims civil case against a local homebuilder, while the third presides over a felony case in which a petition to expunge was denied. There is no possible justification to call any of them as witnesses. As an aside, the Court is aware that the Respondent has sued at least two of those judges in federal court. That case is pending. The undersigned has avoided all contact with that case and is only aware of the existence of the suit.

He also seeks to subpoena US District Court Judge Timothy Corrigan. He asserts that Judge Corrigan will present relevant testimony in the dissolution case. He was unable to articulate any theory of relevance. The Court informed him that the likely result of such a subpoena would be a removal of the subpoena to federal court and a quashing of the subpoena.

The Respondent also announced firm plans to subpoena the current elected State Attorney, RJ Larizza, and several assistant State's Attorneys to "explain" why he was arrested for the various criminal charges, including a pending and active misdemeanor charge of violating the Domestic Violence injunction. He plans to call the elected Sheriff of St Johns County to explain why he was arrested in those criminal cases, and how he was injured at the hands of

Sheriff's Deputies. He plans to call the Attorney General of the State of Florida as a witness for an unknown reason. All of these are detailed in his pretrial statement at DIN 192.

He also seeks to subpoena the mediator in the case, various doctors from Flagler hospital, an unnamed expert on the US Constitution, and all of his former attorneys.

In that same statement, the Respondent asserts he has filed document requests with "St. Johns County Court, the FL State Attorney, the St. Johns Sheriff Office, the St. Johns Jail, Flagler Hospital, FL AG, FDLE, DCF, Betty Griffin, as well as the Federal Middle District Court, the US Justice Department, FBI, IRS, SS, INS, Homeland Security, and the Lebanese Embassy in Washington D.C. as well as the Lebanese Interior and Foreign Ministries" for various documents he claim are relevant to this matter. He claims that he will provide those to counsel before trial. He states he intends to introduce mail, texts and the "dark web."

This pleading is but the last in a long line of *pro se* pleadings. None of these pleadings were filed when he was represented by counsel.

The Respondent's first attorney of record was Mr. Michael Hines who represented the Respondent from September 28, 2021 (DIN 14) through October 28, 2021 (DIN 31) when attorney Laura Wright filed her notice of appearance. Mr. Hines was relieved formally on November 1, 2021 (DIN 34) based on Mr. Hines' motion citing conflict with his client (DIN 32). Ms. Wright continued until March 15, 2022, when attorney Chirstine Leonard entered an appearance (DIN 66). Ms. Wright was formally relieved the same date on a consent order (DIN 68). Mr. Tyson filed a notice of appearance on August 19, 2022. (DIN 87). Ms. Leonard was formally relieved on August 23, 2023 (DIN 88). Respondent has represented himself since February 24, 2023, when attorney Joshua Tyson withdrew as counsel of record citing irreconcilable differences. (DIN 112, 114 and 116).

A review of the docket suggests the case proceeded in a largely typical fashion during all periods in which the Respondent was represented by counsel. The parties scheduled mediation several times. On December 21, 2022, the mediator, Joy Lordahl, filed a notice that the matter had not been settled. On April 3, 2023, the Court set the matter for trial.

Respondent began to file *pro se* motions in this case on May 18, 2023, largely directed towards the Court's order in the Domestic Violence matter. (DIN 129). Similar to the filings in the Domestic Violence case, this motion was styled an "emergency" motion. The motion cited many of the same bases as the filings in the Domestic Violence case including an erroneous recordation of the court's oral pronouncement into the written order, as well as myriad violations of state and federal law. The motion claimed the Respondent has expended over \$100,000.00

in attorney's fees on 8 attorneys. The Court declined to give the motion emergency treatment. (DIN 131).

On June 14, 2023, the Respondent filed a motion withdrawing his previous motion for social investigation and cancelling the hearing previously set for June 15, 2023. (DIN 136). On July 26, 2023, he again filed a motion for social investigation and included a request for temporary relief. (DIN 141) That motion is filled with exaggeration and invective. It overtly and subtly accuses individuals and groups in the judicial system, private industry and health care fields of practicing bigotry and racism towards the Respondent. It likens the treatment of his children to the 19<sup>th</sup> century and the Soviet era. The vast majority of the 22-page pleading is virtually impossible to follow in a logical fashion as it moves in what can only be described as a stream of consciousness fashion from topic to topic. In just one paragraph (by example) on pages 15-16 (paragraph numbered 30), he conflates issues in his small claims case with the home builder with alleged abuse during his chemotherapy with his petition to expunge his criminal record and defend against threats to his security clearance.

Notably, Petitioner's attorney moved to dismiss this motion (DIN 145) citing, *inter alia*, multiple threats to her, other attorneys, judges, judicial assistants, and other personnel. Undeterred, the Respondent filed a responsive pleading accusing Petitioner's attorney of perjury, identity theft, monetary theft, immigration, Medicare, and treasury fraud as well as violations of the Atomic Energy Act. (DIN 147).

The Court proceeded to a temporary needs hearing on August 14, 2023. A significant portion of both the testimony of the Respondent as well as his questioning of the Petitioner was an attempt to relitigate the Domestic Violence case, his pending civil cases in state and federal court and his pending and closed criminal matters. The Court had to frequently redirect his inquiry to the temporary financial needs that were noticed for hearing. The Court issued its order on temporary needs on November 13, 2023 (served on November 14, 2023, DIN 172). Later the same day, the Petitioner moved to disqualify the undersigned. (DIN175) That motion was denied as legally insufficient. (DIN 188).

The Respondent also filed a Motion to Rehear, including, *inter alia*, a patently false claim that "[t]his Court, after watching, just the last few minutes of Judge Anthony's Hearing recording on November 2nd, 2022 (DR21-1577) 'decided' and so 'ordered' just like others before, that the Respondent/Father is just a 'Ranting, Perfidious, Deceiving and Dishonest Arab.'" It is unclear from the context if the Respondent was referring to the undersigned or another person. To the extent it refers to the undersigned, it is categorically false. However, as the Respondent also

filed a Notice of Appeal directed to that order, no rehearing has been held as the Court is divested of jurisdiction to rule on the Motion for Rehearing.

At the pretrial hearing on November 22, 2023, attorney Young submitted an email from the Respondent to her, in which he communicated what could be construed as a veiled threat to her, Judge Anthony, "Department of Children and Families and Betty Griffin cohorts." See Evidence log at DIN 198 – email). Attorney Young asserts this is a common occurrence when attempting to deal with the Respondent acting as his own attorney. This email, among other concerns, precluded the joint pretrial meeting and review of evidence required in the Court's pretrial order. The Court notes, in this regard, that Attorney Young is herself a direct litigation target of the Respondent. He has, *pro se*, filed a civil suit, also pending before the undersigned, in case CA 22-1450 alleging Assault – Deliberate Infliction of Extreme Physical & Emotional Distress, Gross Negligence – Emotional & Physical of a Disabled Elderly Spouse, and Monetary & Identity Theft – Perjury & Legal Malpractice. That case is pending a Motion to Dismiss.

It is clear, after a review of the history in this Domestic Relations case, that this matter will be unable to be tried unless this respondent is represented by a member of the Florida bar. While the Respondent is competent to represent himself, his behavior before the court and in his pleadings demonstrates an inability to address the issues in the case concisely or appropriately. The witness and evidence list filed as part of the pretrial statement are non-serious and designed only to delay, harass, and obfuscate. The repeated motions conflating the multiple pending matters, both in this and federal court, do nothing but clog the machinery of justice.

The Court is intimately familiar with *pro se* litigants. They are a fixture of family law. The conduct of this Respondent is at an entirely different level, and at this stage, patently unmanageable level. As noted above, his pleadings have included outright falsehoods? His actions make a mockery of the justice system. Therefore, the court reluctantly concludes that it must declare this respondent a vexatious litigant and order him to hire an attorney licensed by the Florida bar to file all further pleadings and to represent him in this case. The Court is intimately familiar with the Respondent's finances. While he has been unemployed at various times, it is patent he can afford high quality representation. Indeed, he has retained several highly experienced and skilled family law practitioners in this case.

The Court does not take this order lightly. Unlike civil cases, there is no statute governing vexatious litigation in the Family Law context. Finding a party to be vexatious appears to be governed solely by the general authority of the Court to govern its own docket. A Court has the obligation to move cases along as swiftly as is just. Where courts have previously ruled in

vexatious litigation in family law matters, it appears that reasonable restrictions will be upheld so long as those restrictions do not amount to a total denial of access. See *Young v. Hector*, 884 So. 2d 1025, 1028 (Fla. 3rd Dist. Ct. App. 2004) ("[E]specially in the area of family law, great care should be taken to reduce emotional strife and to avoid vexatious and needless litigation."); *Neunzig v. Neunzig*, 766 So. 2d 441, 442 (Fla. 4th Dist. Ct. App. 2000) (finding that barring a former husband from defending himself *pro se* in an action initiated by the former wife to be too broad a sanction); *Sibley v. Sibley*, 885 So.2d 980, 981 (Fla. 3rd Dist. App. 2004) (barring former husband in dissolution case from representing himself).

One of the primary complaints the Petitioner has, albeit in an inartful manner, expressed in a multitude of pleadings, is the long time this case has taken to move to resolution. The Respondent articulates that he has not seen his children for more than about 40 hours in over 400 days. The Court understands this frustration. Yet, his own actions are causing the delay. His repeated frivolous filings, his unfocused and irrelevant presentation of evidence, and his conflation of the multiple cases he has chosen to participate in, or which were predicated by his actions, lead him here. As the Court informed the Respondent in court, he is, at present, his own worst enemy.

Ordering a party to cease filing pleadings would be an infringement of fundamental rights were there no other option to place pleadings before the court. However, he has discharged 5 qualified family law practitioners as this case progressed. The very engagement of those attorneys indicates strongly that the Petitioner has the financial ability to hire counsel. Moreover, according to his own testimony at the temporary needs hearings and his financial affidavit, he has substantial assets from which to fund an attorney.

The Court also considered other sanctions including assessment of attorneys' fees and striking of pleadings. The Court cannot see how an assessment of fees would assist in advancing this case. It remains a potential sanction, however.

This is not a complex case. While there are significant issues ranging from parenting to support and equitable distribution, there is nothing extraordinary raised by the pleadings. Indeed, while represented by counsel the case appeared to be on a stable trajectory towards a trial. That all ended when the Respondent started to represent himself. The Court concludes that by his actions, he stands blocking the door to justice. He holds the key to unlock that door. This Court can see no other remedy than to preclude him from further *pro se* pleadings and require him to be represented by a member of the bar.

**It is ORDERED AND ADJUDGED:**

1. The respondent, Camille Abboud, is hereby declared a vexatious litigant in this matter only. This order does not apply to any other case pending before the undersigned.
2. The Respondent is hereby barred from filing any documents in the court file until and unless he is represented by an attorney, and those documents are filed by such attorney on his behalf. The sole exception is that he may file an appropriate Motion for Reconsideration or Rehearing or Notice of Appeal directed towards this order alone. The Clerk is directed to reject any other filing.
3. The trial in this case is hereby cancelled.
4. Case management is set for January 17, 2023, at 11:00 AM. The respondent must appear with counsel at that time period. The trial will be reset on an expedited basis at that hearing.

DONE AND ORDERED in chambers, in St. Johns County, Florida, on 22 day of November, 2023.



e-Signed 11/22/2023 6:56 PM DR21-1650  
HOWARD O MCGILLIN JR  
CIRCUIT JUDGE

CF:

The Clerk of Court shall serve this Order upon the following parties or their attorneys of record at their mailing address or via email in accordance with Fla. R. Gen. Prac. & Jud. Admin. 2.516(b)

Petitioner Attorney

Camille Abboud, pro se



**IN THE COUNTY COURT OF THE SEVENTH JUDICIAL CIRCUIT,**

**IN AND FOR ST. JOHNS COUNTY, FLORIDA**

**Iryna R. Abboud**

**PETITIONER  
DEFENDANT**

**-VS-**

**Camille A. Abboud**

**RESPONDENT  
PLAINTIFF**

**CASE NO: DR21-1577**

**CASE NO: CA22-1450**

**CASE NO: DR21-1650**

**Division: 57  
7<sup>th</sup> Judicial Circuit  
St. Johns County Florida**

**MOTION TO RECUSE JUDGE**

**VERIFIED MOTION TO DISQUALIFY AND INCORPORATED  
MEMORANDUM OF LAW**

COMES NOW the Respondent/Plaintiff, pursuant to Rule 2.330, Florida Rules of Judicial Administration, and hereby files this Verified Motion to Disqualify and Incorporated Memorandum of Law, and in support thereof, states as follows:

Rule 2.330, Fla. R. Jud. Admin. allows a party to seek disqualification of the assigned trial judge where the party feels he will not receive a fair trial or hearing because of a specifically described prejudice or bias of the judge. Rule 2.330 (f), Fla. R. Jud. Admin. provides that, upon receipt of a legally sufficient motion to disqualify, "the judge shall immediately enter an order granting disqualification and proceed no further in the action."

The principal facts constituting the grounds for this Motion were discovered throughout the last twenty-six (26+) months starting with the False Arrest, Prejudicial and Malicious

Prosecution of the Respondent/Plaintiff on August 30<sup>th</sup>, 2021, subsequent Arraignment, with multiple injuries from jail, the last Hearing on this case on October 18<sup>th</sup>, 2023 and the Amended Order on November 13<sup>th</sup>, 2023.

These facts are being presented to the Court for an immediate ruling. Thus, this motion is timely filed.

This Motion is filed with all due respect to the Court. Under the circumstances as outlined below, the Respondent/Plaintiff seek the remedy of disqualification.

The Respondent/Plaintiff fears he will not receive a fair hearing, because of this Court's continuing demonstrable prejudice against him.

A recitation of the facts and actions forming the basis for this fear will demonstrate this fear is well-founded.

During the pendency of these related cases (DR21-1577 & DR21-1650) forming the basis for the "Criminal" Case 23-MMMA-1194 against the Respondent/Plaintiff and the Civil/Criminal Case CA22-1450 against the Petitioner/Defendant and her attorney, certain actions were taken and statements made by the Court and the Petitioner/Defendant as well as her attorney, the significance of which were not clearly manifest until the last Hearing on October 18<sup>th</sup>, 2023, and the Amended Order on November 13<sup>th</sup>, 2023 directly violating FS 825.102, effectively physically, financially and emotionally endangering, harming and abusing the Disabled-Elderly Respondent/Plaintiff.

The Disabled-Elderly Respondent/Plaintiff was unlawfully and forcibly arrested, falsely imprisoned and charged with two (2) Counts of Aggravated Assault and Battery by a prejudiced St. Johns Sheriff and State Attorney on Monday August 30<sup>th</sup>, 2021 violating FS 825.102 by knowingly and willfully abused the Disabled-Elderly Defendant, BOTH committing three (3) Counts of First Degree Felonies (see 21-CFMA-1297 & 21-MMMA-1447) based on the False and Perjured testimony of the Petitioner/Defendant. These unlawful, malicious and willful actions, Under the Color of Law, by both the Sheriff and the State Attorney constitute Federal Criminal Acts under Title 18, U.S.C. Section 242 in addition to violating the Defendant's Constitutional and Civil Rights, namely the 1<sup>st</sup>, 2<sup>nd</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 7<sup>th</sup>, 8<sup>th</sup>, 9<sup>th</sup>, 10<sup>th</sup> and 14<sup>th</sup> Amendments as well as the ADA, Elder-Justice and Atomic Energy Acts and continues today in this Court.

Although the Disabled-Elderly Respondent/Plaintiff, in good faith, filed the Motion, with this Court, to re-open DR21-1577, when his then attorney failed to file, within 30 days for a re-hearing or appeal the UNJUST, CRUEL, INHUMANE and SADISTIC Final

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Judgment of Injunction, imparted on him on November 2<sup>nd</sup>, 2022 by Judge Anthony, a Defendant along others in the Federal Claims filed in the U.S. Florida Middle District. This Court chose to review only one (1) of the SEVEN (7) pleadings constituting said Motion as it only relates to the time for the Disabled-Elderly Father to spend two (2) hours with his minor boys at a location more than an hour away, in sub-humane and civilized facility reminiscent of the last century! Over the past 777 days, the Disabled-Elderly Father spent a total of 41 hours within minor kids, spent in complete horror, fear, savagery of awaits them when they leave to spend the next 166 hours with a cruel and savage Mother and Grandmother, similar to the barbaric Soviet Era!

This Court chose to ignore the Father's Pleadings filed under HB 775, (1) To allow the minor kids to take home/receive their 2-years' of birthdays and Christmases' gifts, (2) Have electronic devices (phones still being paid monthly for over 26 months) for the minor kids to communicate with their adult sister, overseas relatives and local family friends, (3) Issue an Order for the Social Investigation approved during the August 14<sup>th</sup>, 2023 Hearing, (4) Issue an Order for the trip home to retrieve belongings, heirlooms, "tools of the trade", vital and pertinent legal documents including social security, taxes, diplomas, private citizens', citizenship and nuclear security documents, and more importantly the evidence "hidden" on the property for his exoneration of any violence and the abuse imparted by the Mother on the minor kids (as documented by a Pleading to Judge Anthony on September 18<sup>th</sup>, 2021, five (5) weeks before the first Injunction Hearing on October 25<sup>th</sup>, 2021), less than one day after being served the Temporary Injunction by the Duval County Sheriff), (5) Restore the Disabled-Elderly Father Second (2<sup>nd</sup>) US Constitutional Amendment to protect the Father from the savagery and assault of his assailant, when the State Attorney admitted, on record, in Judge Christine's Court on October 12<sup>th</sup>, 2023 that "the State Attorney and the Sheriff failed to return the Father guns and ammunitions when they dropped the Assault and Battery charges against him more than 11 months prior, (6) Instead of Ordering the Petitioner and her attorney to immediately and retroactively "amend" the Final Injunction by notating her place of employment and start date (23-MMMA-1194), this Court "allowed" a documented perjured individual to discredit the Father for not paying child and spousal support (Final Injunction does NOT Order ANY) and exercising his Constitutional Rights to seek Justice lawfully. (7) On November 13<sup>th</sup>, 2023, this Court issued an Amended Order filled with accounting and assertions that are prejudicial misconceptions including "older" financial statements for the Father (although new Financial Statements were filed August 19<sup>th</sup>, 2023 before his JEA job loss on August 28<sup>th</sup>, 2023, then petitioned October 29<sup>th</sup>, 2023), disregarding the pleadings by the Father for the loss of the JEA job, loss of his SSDI but yet acknowledged the Petitioner/Mother false statements about SSDI for the entire family for the last 24 months (up until September 2023), and the identity "theft" of the Father/Respondent, over \$100,000 in heirlooms and assets (still at the home), loss of over

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\$500,000 due to the Petitioner's documented/recorded perjuries since August 30<sup>th</sup>, 2021 and continuing today, including the video/recording on May 20<sup>th</sup>, 2023 by the St. Johns Sheriff relating to the "criminal" violation of prejudicial Injunction (DR21-1577) and the Civil Claims (CA22-1450).

Had this Court, without prejudice, false impression and misconceptions, genuinely examined ALL the documents filed in these Cases and the entire recordings of the two (2) Injunction Hearings (October 25<sup>th</sup>, 2021 and November 2<sup>nd</sup>, 2022), as well as all the Motions/Pleadings/Filings in connection with DR21-1650, DR21-1577 and more importantly CA22-1450 Claims, this Court, would have held the Petitioner and her attorney in Contempt of Court and should have ordered the immediate arrest the Petitioner and her attorney as it's in its purview to do so under the Florida Constitution, and specifically FS 741 and 825. Instead, this Court, chose to "abruptly" silence the Father and "threw him" out of this Court. On November 13<sup>th</sup>, 2023, this Court issued an Amended Order relying on misconceptions and false simple and elementary accounting, ordering the Father to pay \$54,617.76 (\$455.15??? per month) in addition to \$2,275.74 for child-support and \$2,400.00 in mortgage payment for the Mother's exclusive use of the home (without Social Investigation to who actually "lives" in the Home), ignoring the Father's Pleadings and Motions (as a Pro Se Respondent) and without accounting for more than \$77,000 in "stolen" money taken from various banks by the Petitioner/Mother while the Father, illegally and prejudicially, rotted in a Covid-Infested Jail between August 30<sup>th</sup> and September 1<sup>st</sup>, 2021 leading to Pericardial Effusion (intensive-care surgery & permanent heart medication) due to multiple Covid-Vaccinations in fear! More so, ignoring more than \$1,700 per month from the Father's SSDI that the Petitioner/Mother received between August 2021 and September 2023.

What happened on November 13<sup>th</sup>, 2023 and on October 18<sup>th</sup>, 2023 in this Court, did happen with varying consequences on March 29<sup>th</sup>, 2023 and August 14<sup>th</sup>, 2023. The Respondent/Plaintiff was repeatedly told to "get an attorney" as if justice in St. Johns County Court can't be accomplished on a Pro Se basis, a Constitutional Right to an individual with over forty (40) years of legal residency in the US, a US Citizen for more than thirty (30) years, with five (5) college degrees, three (3) of which are masters' degrees, seven (7) national certifications and one of the highest nuclear security clearances given, by the Federal Government, to a civilian outside the US Navy, and who paid over there (\$3) Mil in taxes to support Federal and State Governments, when the Petitioner/Defendant got her US Citizenship through the Father and literally, this year, just started paying Federal taxes. Yet, this Court, the Courts of Judges Anthony and Christine chose to ignore three (3) crucial and decisive pieces of evidence: (1) The actual 911 call on August 30<sup>th</sup>, 2021, (2) The video in the hands of the Sheriff & the State Attorney, and (3) the DCF Report of October 13<sup>th</sup>, 2021, ALL exonerating the Father of

ANY violence, towards the kids or the Mother. The Respondent/Plaintiff Elderly-Disabled Father having lived in the Southern US for over 40 years, might fathom the bigotry of the Sheriff, State Attorney and even the ER attendant that sent him to jail, even reason why his Constitutional and Civil Rights are trampled on consistently but can't explain or understand what had happened in the St. Johns Court system, hearings and motions, specifically after spending over \$100,000 to defend himself from this malicious, intentional inflection of cruel and sadistic punishment except that the State of Florida had turned into a "Banana Republic" band of Justice!

Although clear video-evidence and "crime-scene" pictures, in the possession of the Sheriff and the State Attorney, exonerating the Disabled-Elderly Respondent/Plaintiff, since August 30<sup>th</sup>, 2021, the prejudiced elected officials filed two (2) Counts of Aggravated Assault and Battery but those charges were not dropped until December 16<sup>th</sup>, 2022, almost sixteen (16) months later and after Judge Anthony rendered her Unjust Final Injunction.

Despite the fact that the State Attorney consented on December 22<sup>nd</sup>, 2022 to expunge the Father's record with FDLE so he can "reopen DR21-1577" and provide further evidence to CA22-1450, but after learning of Federal Civil and Constitutional Claims filed by the Father in the U.S. Middle District of Florida against six (6) Defendants including this Court, the State Attorney along with the Assailant/Perjurer attended the Expungement Court of the Honorable Judge Smith, the morning of June 16<sup>th</sup>, 2023, to object to the Expungement AND unjustly and unlawfully withdrew their consent, thus prejudicing the St. Johns Co. Court again but more importantly keeping the Father from "re-opening" DR21-1577, as the illegal charges filed on August 30<sup>th</sup>, 2021 were used by the Court of Judge Anthony on November 2<sup>nd</sup>, 2022 to Finalize the Injunction, thus effectively violating the Father's Rights and continue the cruel punishment.

That same afternoon on June 16<sup>th</sup>, 2023, the State Attorney continued to violate FS 825.102, charged the Disabled-Elderly with one (1) Count, without any legal evidence but the statement from the same prejudiced Sheriff almost a month prior, based on the "sworn" testimonies of none other but the Petitioner/Defendants/Perjurers (Mother and her attorney)', of violating said Final Injunction (DR21-1577) for protection against domestic violence, in violation of §741.31(4) (a), a First Degree Misdemeanor, in the above referenced Case 23-MMMA-1194, thus again and again continue to violate Title 18, Section 242, Under the Color of Law, against the Disabled-Elderly Father.

Based on the Unjust and Prejudicial Final Injunction (DR21-1577), the State Attorney continues the persecution, badgering and intimidation of the Disabled-Elderly Arab-Respondent/Plaintiff/Defendant for three (3) Court Appearances, August 24<sup>th</sup>, 2023, September 29<sup>th</sup>, 2023 and again October 12<sup>th</sup>, 2023, violating FS 825.102 and his

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Constitutional and Civil Rights. It is now crystal clear, beyond any doubt, to the Respondent/Plaintiff/Defendant, at the last Hearing on October 18<sup>th</sup>, 2023, through the actions and statements, on a recorded video, of this Court that the Defendant will NEVER get a fair trial. At the last Hearing, the Respondent/Plaintiff tried to implore the Court to review all of the filings, recorded videos and not allow the Petitioner/Defendant's perjured attorney to "derail" and "prejudice" the Court from "severing" the connection between DR21-1577, DR-1650 and CA22-1450, but the Court allowed the injustice to continue and immediately re-closed DR21-1577, stating clearly that this Court will NOT revisit or "retry" the Injustice imparted by a prejudicial Judge, for the Constitutional, Civil and Father's Rights', on the Respondent/Plaintiff. It was plainly evident at the onset of this Hearing, that the "research" performed by this Court from one small section of two (2) very long recorded Hearings (October 25<sup>th</sup>, 2021 and November 2<sup>nd</sup>, 2022) is unjust and biased to the Respondent/Plaintiff's detriment. More so, this Court had continuously refused to restore the Respondent/Plaintiff's 2<sup>nd</sup> Amendment Right, although the State Attorney admitted on record, on October 12<sup>th</sup>, 2023 in Judge Christine's Court, that the guns and ammunitions should have been returned to the Respondent/Plaintiff when the original Cases on August 30<sup>th</sup>, 2021 were dismissed on December 16<sup>th</sup>, 2022.

On November 13<sup>th</sup>, 2023, this Court issued an Amended Prejudicial Order adding to the physical, emotional and financial assaults on the Disabled/Elderly Father/Respondent violating his FL and US Constitutional Rights. Over the past eleven (11) months since this Court was assigned the Father/Respondent cases has been prejudicial and harmful to the Father/Respondent Disabled/Elderly reminiscent of bigotry and biased era of a "Banana Republic" band of Justice.

### **MEMORANDUM OF LAW**

Rule 2.330, Fla. R. Jud. Admin., allows a party to seek disqualification of the assigned trial judge where the party feels he will not receive a fair trial or hearing because of a specifically described prejudice or bias of the judge. Rule 2.330(f), Fla. R. Jud. Admin. provides that, upon receipt of a legally sufficient motion to disqualify, "the judge shall immediately enter an order granting disqualification and proceed no further in the action."

The Disabled-Elderly Respondent/Plaintiff believes the Court is prejudiced against him. The Court has taken on the role of advocate for the State, the Sheriff and his Assailant and is no longer an impartial arbitrator in this matter. The actions of this Court in (1) issuing an Amended Prejudicial Order on November 13<sup>th</sup>, 2023 without a

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reasonable and fair accounting practice and failure to Order the Social Investigation (although this Court mentioned a specific Investigator that the Father/Respondent immediately accepted the Cost for the sake of his minor children (see Petition to Judge Anthony dated September 18<sup>th</sup>, 2021), (2) allowing the Petitioner/Defendant's attorney to 'raise' the stakes and "prejudice" the Court at every Hearing, (3) allowing the Petitioner/Defendant's attorney to "spew" venomous and untruthful statements (including a conversation with my previous attorney without offering ANY proof), and abruptly ending the Hearing to permit the perjured attorney to "regroup" without calling the video-documented Perjured-Assailant to the stand, (4) allowing the Petitioner/Defendant's attorney to object to every Magistrate assigned since August 30<sup>th</sup>, 2021, including one such objection failed within the 30-day limit and (5) through five (5) Hearings continue to "insinuate" that the Disabled-Elderly-Arab Respondent/Plaintiff is completely "untruthful" while conducting its own "boxed" and "bundled" very-limited research handed the Petitioner/Defendants many "valuable legal" gifts to be used while presiding at Trial (DR21-1650) and/or at the Pre-Trial Hearing, if ANY, for CA22-1450, to "object" for various evidentiary proofs, without home access for retrieval, demonstrate this Court's Extreme Bias. Thus, the Father/Respondent/Plaintiff's fear that he will not receive a fair Trial, presided by this Court, is well-founded, objective, and reasonable.

"When a judge enters into the proceedings and becomes a participant or an advocate, a shadow is cast upon judicial neutrality." *R.O. v. State*, 46 So. 3d 124, 126 (Fla. 3d DCA 2010); see also *Williams v. State*, 160 So. 3d 541, 544 (Fla. 4th DCA 2015). Trial judges must studiously avoid the appearance of favoring any one party in a lawsuit, and suggesting to the State or a party how to proceed strategically constitutes a breach of this principle. See *Chastine v. Broome*, 629 So.2d 293 (Fla. 4th DCA 1993) (holding that a Trial Judge's provision of strategic advice to a party during a trial demonstrated impermissible bias); see also *J.F. v. State*, 718 So.2d 251 (Fla. 4th DCA 1998) (disapproving a Trial Judge who assisted with a delinquency prosecution by requesting the production of additional State's evidence).

"Prejudice of a judge is a delicate question to raise, but when raised as a bar to the Trial of a cause, if predicated on grounds with a modicum of reason, the Judge against whom raised should be prompt to recuse himself." *Livingston v. State*, 441 So.2d 1083, 1085 (emphasis added). Where there is any legally sufficient basis, whether factually accurate or not, for a founded fear of possible prejudice to exist in the mind of a Defendant, recusal is mandated. See, e.g., *Management Corporation of America, Inc. v. Grossman*, 396 So.2d 1169 (Fla. 3rd DCA 1981).

A motion to disqualify a judge must establish a fear on the part of the movant that he or she will not receive a fair and impartial hearing. See, *Quince v. State*, 592 So. 2d 669,

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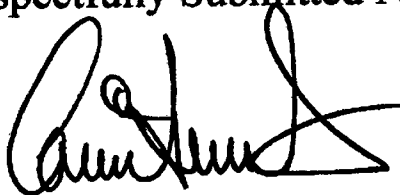
670 (Fla. 1992). The instant Motion clearly establishes such a fear. The Motion "must be well-founded and contain facts germane to the Judge's undue bias, prejudice, or sympathy." *Rivera v. State*, 717 So. 2d 477, 480-81 (Fla. 1998). The instant Motion is well founded, based on the record, and respectfully consists of germane facts showing the bias and prejudice of the Court.

In determining the legal sufficiency of a motion to disqualify, a court looks to see whether the facts alleged would place a reasonably prudent person in fear of not receiving fair and impartial treatment from the Trial Judge. See, e.g., *Johnson v. State*, 769 So. 2d 990 (Fla. 2000). In the instant case, a reasonably prudent person, would be in fear that the Court, because of its prejudice or bias deprived him of fair and impartial treatment.

The fear of judicial bias must be objectively reasonable. *State v. Shaw*, 643 So. 2d 1163, 1164 (Fla. 4th DCA 1994). A subjective fear is insufficient. See, e.g., *Kowalski v. Boyles*, 557 So. 2d 885 (Fla. 5th DCA 1990). While the Respondent/Plaintiff clearly possesses a subjective fear (it being his, it is by definition subjective), his fear is also objective, as it is based on demonstrable, extant facts replete in the record, both written and of proceedings. Thus, given that Judges Anthony and Christine are Defendants in his Federal Suit, he has shown an objectively reasonable fear that he will not receive a fair trial or hearing in this cause, based on a specifically described prejudice/bias of this Court.

WHEREFORE, Respondent/Plaintiff prays this Honorable Court enters an Order of Recusal prior to the November 22<sup>nd</sup>, Pre-Trial Hearing and the December 21<sup>st</sup>, 2023 Trial Hearing, without a Jury.

Respectfully Submitted November 14<sup>th</sup>, 2023.

 11/14/2023

Camille A Abboud

#### CERTIFICATE OF SERVICE

HEREBY CERTIFY that a signed, true and correct copy of the foregoing has been furnished this 14<sup>th</sup> day of November 2023, to Florida E-Filing Portal and to the Petitioner/Defendants' Attorney on Record, Derri Lassiter Young.



IN THE CIRCUIT COURT, SEVENTH  
JUDICIAL CIRCUIT, IN AND FOR ST.  
JOHNS COUNTY, FLORIDA

CASE NO.: DR21-1650

DR 21-1577

CA 22 - 1450

DIVISION: 57

IRYNA ABOUD  
PETITIONER  
AND  
CAMILLE ABOUD  
RESPONDENT

**ORDER ON MOTION TO RECUSE JUDGE VERIFIED MOTION TO DISQUALIFY AND  
INCORPORATED MEMORANDUM OF LAW**

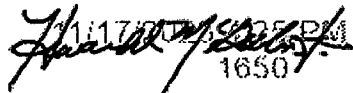
THIS CAUSE has come before the Court upon the Motion To Recuse Judge Verified Motion To Disqualify And Incorporated Memorandum Of Law filed on November 14, 2023 by Camille Abboud in all three listed cases. The Court being fully advised in the premises, finds as follows:

The Motion is legally insufficient under Fla. R. Gen. Prac. & Jud. Admin. 2.330.

It is ORDERED AND ADJUDGED:

1. The Motion is DENIED.
2. This Order shall be filed in all three case files.

DONE AND ORDERED in chambers, in St. Johns County, Florida, on 17 day of November, 2023.

 11/17/2023 4:25 PM DR21-1650

e-Signed 11/17/2023 4:25 PM DR21-1650  
HOWARD O MCGILLIN JR  
CIRCUIT JUDGE

Petitioner Attorney  
Camille Abboud

**IN THE COUNTY COURT OF THE SEVENTH JUDICIAL CIRCUIT**  
**IN AND FOR ST. JOHNS COUNTY, FLORIDA**

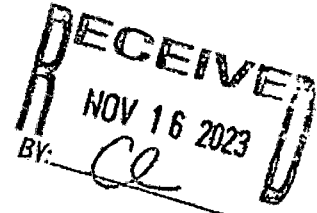
**Camille A. ABOUD**,  
Appellant(s)

VS.

Lower Tribunal Case No.: **DR21-1650**

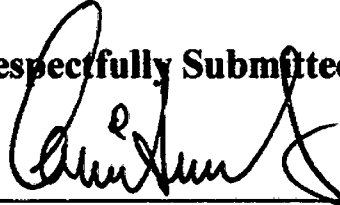
**IRYNA R. ABOUD**,  
Appellee(s)

**NOTICE OF APPEAL**



NOTICE IS GIVEN that CAMILLE A. ABOUD, Appellant, appeals to the 5<sup>th</sup> DCA, 5<sup>th</sup> District Court of Appeal, the Order of this Court rendered (see Florida Rule of Appellate Procedure 9.020(g)), **November 13<sup>th</sup>, 2023**. The nature of the order is an ORDER ON AMENDED MOTION FOR TEMPORARY NEEDS, TEMPORARY SPOUSAL SUPPORT, TEMPORARY CHILD SUPPORT AND EXCLUSIVE USE AND POSSESSION OF MARITAL HOME.

Respectfully Submitted,

 11/16/23

Name: **CAMILLE A. ABOUD**

Address: **145 Ascend Circle**

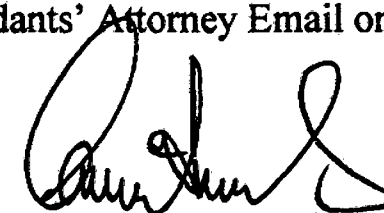
**Suite 3201**

**Saint Johns, FL 32259**

**720.480.0090**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a signed, true and correct copy of the foregoing has been furnished this 16<sup>th</sup> day of November 2023, to Florida E-Filing Portal and to the Petitioner/Defendants' Attorney Email on Record, **Derri Lassiter Young**.

 11/16/23

Signature

**IN THE COUNTY COURT OF THE SEVENTH JUDICIAL CIRCUIT**  
**IN AND FOR ST. JOHNS COUNTY, FLORIDA**

**Camille A. ABOUD**,  
Appellant(s)

VS.

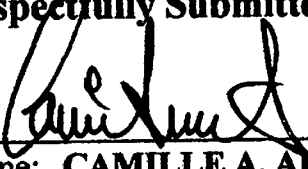
Lower Tribunal Cases No.: **DR21-1650**  
**DR21-1577**  
**CA22-1450**

**IRYNA R. ABOUD**,  
Appellee(s)

**NOTICE OF APPEAL**

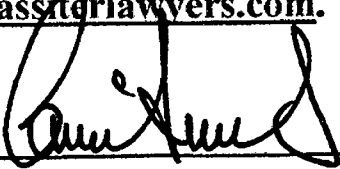
NOTICE IS GIVEN that **CAMILLE A. ABOUD**, Appellant, appeals to the 5<sup>th</sup> DCA, 5<sup>th</sup> District Court of Appeal, the Order of this Court rendered (see Florida Rule of Appellate Procedure 9.020(g)), **November 17<sup>th</sup>, 2023**. The nature of the order is an ORDER ON MOTION TO RECUSE JUDGE VERIFIED MOTION TO DISQUALIFY AND INCORPORATED MEMORANDUM OF LAW (filed in all the three cases DR21-1650, DR21-1577 and CA22-1450).

Respectfully Submitted,

 11/24/23  
Name: **CAMILLE A. ABOUD**  
Address: **145 Ascend Circle - Suite 3201**  
**Saint Johns, FL 32259**  
**720.480.0090**

**CERTIFICATE OF SERVICE**

I HEREBY CERIFY that a signed and true copy of the foregoing has been furnished this **24<sup>th</sup> day of November 2023**, to Florida E-Filing Portal and by **Certified US Mail** to the Appellee/Petitioner/'s Attorney **Derri Lassiter Young, The Lassiter Law Firm: 6100 Greenland Rd. STE 403, Jacksonville, FL 32258-2453** AND by Email at **derri@lassiterlawyers.com**.

 11/24/23  
Signature

**IN THE COUNTY COURT OF THE SEVENTH JUDICIAL CIRCUIT**  
**IN AND FOR ST. JOHNS COUNTY, FLORIDA**

**Camille A. ABOUD**,  
Appellant(s)

VS.

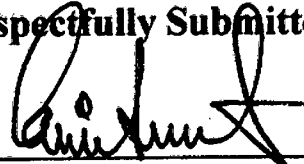
Lower Tribunal Case No.: **DR21-1650**

**IRYNA R. ABOUD**,  
Appellee(s)

**AMENDED NOTICE OF APPEAL**

NOTICE IS GIVEN that **CAMILLE A. ABOUD**, Appellant, appeals to the 5<sup>th</sup> DCA, 5<sup>th</sup> District Court of Appeal, the Order of this Court rendered (see Florida Rule of Appellate Procedure 9.020(g)), **November 13<sup>th</sup>, 2023**. The nature of the order is an ORDER ON AMENDED MOTION FOR TEMPORARY NEEDS, TEMPORARY SPOUSAL SUPPORT, TEMPORARY CHILD SUPPORT AND EXCLUSIVE USE AND POSSESSION OF MARITAL HOME.

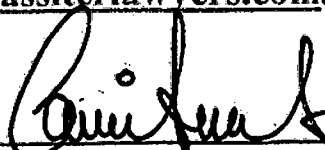
Respectfully Submitted,

 11/24/23

Name: **CAMILLE A. ABOUD**  
Address: **145 Ascend Circle - Suite 3201**  
**Saint Johns, FL 32259**  
**720.480.0090**

**CERTIFICATE OF SERVICE**

I HEREBY CERIFY that a signed and true copy of the foregoing has been furnished this **24<sup>th</sup> day of November 2023**, to Florida E-Filing Portal and by **Certified US Mail** to the Appellee/Petitioner's Attorney **Derri Lassiter Young, The Lassiter Law Firm: 6100 Greenland Rd. STE 403, Jacksonville, FL 32258-2453** AND by Email at **derri@lassiterlawyers.com**.

 11/24/23  
Signature

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT,  
IN AND FOR ST. JOHNS COUNTY, FLORIDA

Iryna R. Abboud

Petitioner/Wife

-VS-

Camille A. Abboud

Respondent/Husband

CASE NO: DR21-1650  
Division: 57  
7<sup>th</sup> Judicial Circuit  
St. Johns County Florida

**NOTICE/PETITION OBJECTING TO THE PRETRIAL STIPULATION**

Camille A Abboud, as a Pro Se Respondent, respectfully files this Notice/Petition Objecting to Items listed in the Pretrial Stipulation Filed by the Petitioner on November 21<sup>st</sup>, 2023 as follows (Objection listed by items numbers as filed):

1. Item 4 – Objection to the Date of Separation was actually August 30<sup>th</sup>, 2021 after the Respondent was assaulted around 4 PM and sent to jail.
2. Item 6 – Respondent objects to the Final Judgment of Injunction Order issued by the Honorable Judge Anthony, dated November 7<sup>th</sup>, 2023.
3. Item 6 – Respondent objects to the Order on Wife's Motion for Temporary Needs issued by this Honorable Court on November 13<sup>th</sup>, 2023, as it was objected to and appealed on November 16<sup>th</sup>, 2023.
4. Items 8, 9, 10 – Respondent objects to all these Items as it violates FS 825 and Father's Rights under House Bill CS/CS/HB 775, passed by the FL House of Representatives April 26<sup>th</sup>, 2023 and the FL Senate on April 27<sup>th</sup>, 2023 and approved by the FL Governor June 9<sup>th</sup>, 2023.
5. Item 11 – The Respondent testified and filed multiple documents documenting his JEA job loss as of August 28<sup>th</sup>, 2023. The Respondent notified the Court and the Petitioner that the SSDI payment were suspended as of September 2023. The Respondent filed an Appeal with Social Security Administration that was accepted

and the decision to reinstate his SSDI (\$3258) and the \$1708 for his Family (including the Petitioner) is still pending.

6. Item 12 (b) - The loss of his SSDI and his JEA job led to his kids losing Medicaid. The Respondent filed for Medicaid reinstatement for his kids, and this decision is still pending as the FL DCF Rules require that the Tax Filer as a Head of Household for the past two (2), as the Petitioner testified to, is the responsible Parent to file for FL Medicaid. Once the Respondent's SSDI is reinstated, then he can file for Medicaid for the kids.
  7. Item 13 – The Respondent, as a Cancer survivor and permanently disabled, cannot acquire or pay the excessive life insurance to protect his kids except through his Social Security after the age of 67.
  8. Item 14 – The Respondent object to ANY spousal alimony – See Pre and Postnup as well as an able body to secure a job, as she did last April, and continue to produce income far exceeding what the Disabled/Elderly Respondent can afford or make, even on SSDI (Limit of \$1470 per month without losing the SSDI).
  9. Item 15 – The Respondent strongly and vigorously object to the ownership of the Marital Home, specifically when the Petitioner filed to sell said Marital Home in an Auction and emphatically refused to allow the refinancing of the Marital Home in early 2022 at 2.25%, 15-year fixed mortgage, one of the lowest in US History!
  10. Item 19 – The Respondent object to excluding ANY witnesses OR Exhibits filed by the Respondent and including ANY of the cases pending in State and/or Federal Court. These witnesses and exhibits are allowed under FL and US Constitutions.
  11. Item 20 (A) & (C) – The Respondent insists on the Mandatory UP-TO-DATE DETAILED Financial Affidavits and disclosures dating back for at least four (4) years from November 13<sup>th</sup>, 2023, i.e. since November 13<sup>th</sup>, 2019, when the Respondent found out his Cancer. See objection above to the exclusion of ANY evidence, witnesses or exhibits from All the State and Federal Cases filed by the Respondent. Even in a simple Small Claim Case (SP22-508, with the Honorable Judge Blocker and \$10K at stake, the Petitioner tried to “testify” against the Respondent/Husband for the benefit of another man, in direct violation of FS Section 90.504 (the Respondent objection then is clearly documented/recorded in Judge's Blocker Courtroom).
  12. Item 21 – The parties weren't able to “stipulate” to ANY issues as the Petitioner and her Attorney “negotiated” in bad faith and still refuse to accept the recent State-of-the-Art entity within 5-7 mins, for the Father to see his boys. Forty-one (41) hours over the last 818 DAYS, almost 3 Birthdays/Christmases with his boys (no gifts or electronics, clothing or food) is not only inhumane but sadistic.
  13. Item 22 – The Respondent was violently attacked and left with five (5) injuries, three (3) of which are now permanent, only because he asked for a civilized divorce
-

and offering much more than the Court's allows. The Respondent adamantly object and refuses to entertain ANY attorney's fees, when the status of over \$140K, in cash, is still UNKNOWN. Additionally, the Attorney's Fees include fees to defend herself from CA22-1450, includes DR21-1577 and possibly include fees from other Claims by the Respondent in State and Federal Courts.

14. The Respondent in his latest filing on November 20<sup>th</sup>, 2023, offered at the discretion of this Honorable Court to attend another round of Mediation, albeit in good faith by the Petitioner and her attorney, just for the sake of his minor boys!.

Respectfully Submitted November 21<sup>st</sup>, 2023.



11/21/2023

Camille A Abboud

### CERTIFICATE OF SERVICE

HEREBY CERIFY that a signed, true and correct copy of the foregoing has been furnished this 21<sup>st</sup> day of November 2023, to Florida E-Filing Portal and to the Petitioner's Attorney: derri@lassiterlawyers.com.

IN THE DISTRICT COURT OF APPEAL  
FIFTH DISTRICT OF FLORIDA

CASE NO: 5D23-3463  
L/T CASE NO: 2021-DR-1650

IN RE:  
CAMILLE ABOUD,  
Appellant,

vs.

IRYNA R. ABOUD,  
Appellee.

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**NOTICE OF NON-REPRESENTATION**

The Lassiter Law Firm and Derri Lassiter Young, Esquire hereby enters this Notice of Non-Representation in the above referenced case. All pleadings should be served upon

IRYNA R. ABOUD at the following address and email address:

46 Chandler Drive, St. Johns Florida 32259

Irynaabboud1@gmail.com.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this pleading has been furnished on this 8<sup>th</sup> day of January, 2024 to IRYNA ABOUD at [irynaabboud1@gmail.com](mailto:irynaabboud1@gmail.com) and CAMILLE ABOUD at [camilleabboud2013@gmail.com](mailto:camilleabboud2013@gmail.com).

*/s/ Derri Lassiter Young*

DERRI LASSITER YOUNG, ESQ.  
The Lassiter Law Firm, P.A.  
6100 Greenland Road, Suite 403  
Jacksonville, Florida 32258  
(904) 779-5585 phone  
(904) 779-5252 fax  
[Derri@lassiterlawyers.com](mailto:Derri@lassiterlawyers.com)  
Florida Bar No.: 0596019

RECEIVED, 01/09/2024 06:22:21 AM, Clerk, Fifth District Court of Appeal



IN THE CIRCUIT COURT, SEVENTH  
JUDICIAL CIRCUIT, IN AND FOR ST.  
JOHNS COUNTY, FLORIDA

CASE NO.: DR21-1650

DIVISION: 57

IRYNA ABOUD  
PETITIONER  
AND  
CAMILLE ABOUD  
RESPONDENT

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**ORDER ON EMERGENCY MOTION FOR CONTEMPT AND ENFORCEMENT AND  
REQUEST FOR ATTORNEYS FEES**

**AND**

**ORDER ON EMERGENCY MOTION FOR INTERIM ATTORNEYS FEES**

**AND**

**ORDER OF CASE MANAGEMENT**

THIS CAUSE has come before the Court upon the Petitioner's Motions at DIN 227 and 229 respectively on February 16, 2024. The Court being fully advised in the premises, finds as follows:

The Motions before the Court are not emergencies. See DIN 234. These matters were heard in due course on the Court's regular docket.

A. Motion for Contempt and Enforcement

(1) The Court previously ordered temporary needs. See DIN 174 dated November 14, 2023. The Court ordered the Respondent to pay \$2,275.74 monthly in interim child support with an additional \$455.15 monthly in arrears payments totaling \$2,730.89.

(2) The Petitioner testified she has not received any payment for December, January or February.

(3) The Respondent claims that he is now unemployed. He admits his unemployment was caused by termination from his employer due, at least in part, to that employer's discovery of his then pending criminal charges related to domestic violence against this Petitioner. He also claims that he should not have to pay because the Petitioner is drawing Social Security benefits from his disability fraudulently. He admits that in the time since the

Court issued its temporary needs order, his stock market accounts (held as a retirement account) have increased in value from approximately \$400,000 to \$600,000. The Court notes that these assets are still subject to taxation upon withdrawal. As the Respondent is over 59 ½ years old that withdrawal is without early withdrawal penalty.

(4) The Respondent reminds the Court that his temporary needs order is on appeal. However, there is no stay of the order on record. Moreover, under Fla. R. App. P. 9.600 (c), this Court has “jurisdiction to enter and enforce orders awarding separate maintenance, child support, alimony, attorneys’ fees and costs for services rendered in the lower tribunal, temporary attorneys’ fees and costs reasonably necessary to prosecute or defend an appeal, or other awards necessary to protect the welfare and rights of any party pending appeal.” *Id.* [Emphasis added].

(5) None of his excuses for non-payment afford him any relief. The Court finds he is in willful contempt. He has the past, present, and future ability to pay the support obligation. The Court finds that he also has the ability to pay an immediate purge amount of the outstanding support through the beginning of February 2024, totaling three payments of \$2,730.89 for a total of \$8,192.67. He shall pay this amount, directly to the Petitioner, within 15 days of this Order as a purge of his contempt, or shall, on affidavit of non-payment, be subject to a writ of bodily attachment for non-payment of child support.

(6) The Petitioner has also requested fees related to her Motion for Contempt. Fees may be awarded on a contempt motion as part of the sanction for contemptuous behavior. The Court has reviewed the Attorney’s Fee Affidavit submitted at DIN 255 and accepted during the hearing as evidence. On that affidavit the Court identifies 3.3 hours of attorney effort directed to the Motion for Contempt, including .5 hours spent at the actual hearing. The Court finds 3.0 hours reasonable for this motion. There were also .2 hours of administrative effort billed for the e-filing of the motion. That, notwithstanding its inartful description as “administrative,” is paralegal work since e-filing is work which ordinarily requires a lawyer, but can be performed by a paralegal under attorney supervision, and can be awarded as such. The Court finds the rate of \$350.00 per hour for attorney Lassiter to be appropriate and in concert with prevailing rates for attorneys of similar experience in this general area. The rate of \$185.00 for paralegal work is also reasonable and consistent generally with rates in in this area. The Court therefore awards fees in the amount of \$1,050.00 for attorney fees and \$37.00 for paralegal work which

replaced attorney work, for a total fee award of \$1,087.00. The Respondent shall pay this amount, directly to Attorney Lassiter within 15 days of the date of this Order.

**B. Motion for Interim Attorney's Fees**

(1) The Petitioner requests interim attorney's fees in this matter. The request is under Fla. Stat. § 61.16 and *Rosen v. Rosen* 696 So. 2d 697 (Fla. 1997). The essential purpose of Fla. Stat. § 61.16 is "to ensure that both parties will have a similar ability to obtain competent legal counsel." *Rosen*, *Id* at 699.

(2) The Petitioner seeks interim attorney's fees. She claims a need of payment of past fees totaling \$24,573.50 and a need for future fees through a trial of \$10,000.00. The Petitioner did not, however, present any evidence detailing the specific need for future fees including a reasonable budget.

(3) The Petitioner has paid approximately \$20,000.00 towards those fees. Much of that amount has been by credit card. The Petitioner claims that she pays the monthly invoices using both her checking and credit card accounts. She claims she cannot pay the full amount due. She repeated evidence previously heard at temporary needs that she had \$140,000 in marital funds at the outset of the litigation but used those funds to pay the mortgage on the family home through February 2023 and to provide support for the children through the temporary needs hearing. She has less than \$5000.00 in liquid assets. She makes \$2,720.00 monthly at Wal Mart but recently had her hours cut. In addition to the trial attorney, she has had to hire appellate counsel because of the Respondent's multiple appeals. The Court notes this only to detail her expenses. The Court is NOT awarding any fees, presently, because of those appeals as that matter is not properly before the Court.

(4) The Respondent again asserts that he is unemployed, receiving SSDI only. He further asserts that he *only* has \$30,000.00 in savings. He confirms as noted above that he has increased the value of his retirement account to \$600,000.00. He also admitted that he is actively drawing funds from the retirement account. The Court has only limited information to conclude whether that particular asset is marital, non-marital or a mixture of the two. That issue will wait for trial. However, the account is available as a source of payment. Counsel for Respondent argued that the Court should, essentially, only consider his present income. There is no such restriction at law. Finally, the Court notes that the Respondent admits to sending

money on a regular basis both to his adult daughter (by another relationship) to pay her credit card bills and to his siblings in Lebanon.

(5) The Respondent recently also received, as did the Petitioner, a lump sum for arrears of SSDI. The Petitioner testified, however, that she cannot use her amount because she is no longer eligible for the payment in her own right due to her own earned income. While she has had to invade some of that lump sum to pay day-to-day living expenses, she understands she must repay that amount to the Social Security Administration in due course. The Court does not consider her lump sum payment as reasonably available to pay fees. The Respondent's lump sum, however, is potentially available to him.

(6) The Respondent recently hired counsel pursuant to this Court's Order declaring him a vexatious litigant. The Court accepts his representation that the Order requiring counsel made him a less attractive client. As a result, he is paying a potentially higher rate for attorney services. Nevertheless, he is able to retain the services of an attorney. The Court is also aware that the Respondent is claiming indigency in his appeal. The Court is uncertain how he can sustain that claim with admissions of over \$600,000 in retirement assets available to him.

(7) The Court concludes that the Petitioner is entitled to interim fees after evaluating the factors in Fla. Stat. § 61.16 and *Rosen*.

a) Attorney Lassiter has billed \$24,573.50 on this matter and has received payment for \$20,000.00. Her fee affidavit is at DIN 255 and is considered evidence in this matter by agreement of the parties. The Court has reviewed the fee affidavit. In it she appears to assert 40.5 hours at \$350.00 per hour for attorney work and \$185.00 per hour for paralegal. While the Court finds the rates are reasonable, the Court is unable to replicate her calculation on the top of page 2 of her affidavit. It appears instead that a total of 71.2 hours of attorney and paralegal time have been expended. The Court will conduct its own analysis of the billing

b) The Court previously expressed concern that the fees on a prior affidavit impermissibly mixed fees for a domestic violence injunction with the dissolution case. There are no fees generally available for the domestic violence matter and the Court is required to segregate those fees from the domestic relations case. The Court finds that .9 hours claimed on this affidavit were actually on the injunction matter and are not compensable here.

c) In addition, there are several appeals pending, including both the domestic violence case and this domestic case. Appellate fees will also be segregated. The Court finds

there is a total of 1.0 hour billed here which should be on the appeal matters. Those fees are not presently compensable here.

d) Finally, there is also a collateral civil matter. Those fees are not compensable in this case. The Court finds that .1 hour was billed here for issues related instead to the civil case.

e) The Court is also required to examine the details of the items claimed on the fee affidavit and may only award fees for efforts directed to advance the litigation. In general, that means that items such as "client conference" without further specificity should be discounted as client relations and not be chargeable to any opposing party. For paralegals, the Court is required to disregard fees for purely administrative tasks. However, as with the contempt order above, when paralegal work is substituted, under attorney supervision, for attorney work, it is compensable at the paralegal rate.

f) In addition, the Court must review each entry for reasonableness. The Court notes that there are several entries claiming 2/10 of an hour to review documents such as an Order on Withdrawal of counsel, review of Case Management Order, or review of Zoom order. The Court finds that billing for 2/10 hour on those tasks and several others is excessive. The Court has reduced those to a reasonable amount of time which is compensable.

g) Of the 40.5 hours claimed, the Court has already awarded fees for 3.0 attorney hours (reduced from 3.3 hours) on the contempt motion as well as .2 hours of paralegal effort on that motion. The Court has disregarded fees for the appeals (1.0 attorney hour), the domestic violence case (.9 attorney hours) and the civil case (.1 attorney hour). The Court further reduces the claim by 4.5 hours of attorney time and .3 hours of paralegal time spent on tasks amounting to client relations. Finally, the Court reduces a total of 5.1 hours of attorney effort, across multiple diverse entries, which the court deemed unreasonable to 2.4 hours

h) The Court has reviewed the remaining billing entries. After reducing for the items notes above, and discounting the hours as discussed, the Court finds that 53.7 hours of attorney time (at \$350 per hour = \$18,795.00) and 1.4 hours of paralegal time (at \$185.00 per hour = \$259.00) are reasonable. This totals \$19,054.00.

(8) The Court finds that the Petitioner needs assistance with her attorneys' fees. The Court finds that the Respondent should bear one-half of the expense of the Petitioner's fees

retrospectively. Therefore, the Court orders him to pay \$9,527.00 to the Petitioner within 15 days as partial contribution towards he attorney's fees.

(9) The Court retains jurisdiction to enforce this Order. The Court also retains jurisdiction to award an advance of trial fees upon a proper showing of both a budget and a specific need, particularly in light of the award made herein.

C. Order of Case Management: The Court finds that this case is at issue. Respondent is now represented by counsel. The Court will set this matter for trial by separate order.

**It is ORDERED AND ADJUDGED:**

1. The Respondent is in contempt of Court for willful non-payment of child support. The Court orders him to pay a purge amount directly to the Petitioner by check or money order in the amount of \$8,192.67 within 15 days of the date of this Order. He has the ability to pay this amount.
2. If he shall fail to pay such amount, then upon affidavit of non-payment of the purge amount, the Court will enter a writ of bodily attachment for the Respondent's immediate arrest. If issued, the Respondent may purge himself of the contempt and be released on payment of the specified purge amount. If arrested on a writ of bodily attachment, he may be held in custody for up to 48 hours before being taken before a judicial officer.
3. The Respondent shall pay, direct to Attorney Lassiter, the sum of \$1,087.00 for attorneys' fees associated with the Motion for Contempt. This payment is due not later than 15 days from the date of this Order.
4. The Respondent shall pay \$9,527.00 to the Petitioner for partial contribution towards her attorney's fees. He shall make this payment within 15 days of the date of this Order. The Court retains jurisdiction to modify this order on a showing of a specific budget for and need for advance trial fees after considering the effect of this order.
5. The Court will set this case for trial by separate order.
6. The Court retains jurisdiction to enforce this Order.

**DONE AND ORDERED** in chambers, in St. Johns County, Florida, on 22 day of March, 2024.

 3/22/2024 2:02 PM DR21-1650

e-Signed 3/22/2024 2:02 PM DR21-1650

HOWARD O MCGILLIN JR  
CIRCUIT JUDGE

CF:

The Clerk of Court shall serve this Order upon the following parties or their attorneys of record at their mailing address or via email in accordance with Fla. R. Gen. Prac. & Jud. Admin. 2.516(b)

Petitioner Attorney

Respondent Attorney

IN THE CIRCUIT COURT, SEVENTH  
JUDICIAL CIRCUIT  
IN AND FOR ST. JOHNS COUNTY,  
FLORIDA

CASE NO.: CA22-1450  
DIVISION: 57

CAMILLE A. ABBOUD,  
PLAINTIFF,  
AND  
IRYNA R. ABBOUD  
DERRI LASSITER YOUNG,  
DEFENDANT(S).

NOTICE OF HEARING

PLEASE TAKE NOTICE that on the October 11, 2024 at 11:00 AM the Court will hold  
a 30 minute hearing on the following:


MOTION TO DISMISS

&

CASE MANAGEMENT CONFERENCE

before the undersigned, in Room Courtroom 355, at Richard O. Watson Judicial Center -  
4010 Lewis Speedway - St. Augustine - FL 32084.

DONE AND ORDERED IN CHAMBERS, IN ST. JOHNS COUNTY, FLORIDA, ON 12  
DAY OF September, 2024.

9/12/2024 1:24 PM CA22-1450  


e-Signed 9/12/2024 1:24 PM CA22-1450

\_\_\_\_\_  
HOWARD O MCGILLIN JR  
CIRCUIT JUDGE

Copies to: All parties of record

Party Name

CAMILLE A. ABBOUD .

IRYNA R. ABBOUD .



## **APPENDIX B:**

**Florida 5th District of Appeals – ALL  
Orders – 5DCA- Appeal Cases: 5D23-  
3383, 5D23-3455, 5D23-3463, 5D23-3482 &  
5D24-0799. (Dated May 10<sup>th</sup> & 29<sup>th</sup>, 2024,  
June 6<sup>th</sup>, 2024, July 7<sup>th</sup>, 2024, August 2<sup>nd</sup>,  
2024) AND Florida Supreme Court –  
Orders – Appeal Cases: SC24-0142, SC24-  
0143, SC24-0144, SC24-623 & SC24-1213.  
(Dated August 20<sup>th</sup>, 2024).....**78 Pages****

**IN THE DISTRICT COURT OF APPEAL  
FIFTH DISTRICT OF FLORIDA**

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**CASE NO. 5D23-3463  
LT CASE NO. 2021-DR-1650**

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**CAMILLE A. ABOUD**

**Respondent/Appellant**

**Vs.**

**IRYNA R. ABOUD,**

**Petitioner/Appellee**

---

**APPELLANT'S AMENDED INITIAL BRIEF**

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**JURISDICTION**

***This Honorable Court does have jurisdiction in this Case.***

**CAMILLE A. ABOUD**

**PRO SE APPELLANT**

**100 Audubon Place**

**Suite 1420**

**Saint Johns, Florida 32259**

**(720) 480-0090**

**Email: [camilleabboud2013@gmail.com](mailto:camilleabboud2013@gmail.com)**

## **INTRODUCTION - DESIGNATION**

Camille A. Abboud will be referred to as Appellant, Respondent, Husband or Father. Iryna R. Abboud will be referred to as Appellee, Petitioner, Wife or Mother.

The Circuit, Divorce or Trial Court Judge is the Presiding Judge Howard O. McGillin, Jr. as of January 1<sup>st</sup>, 2023 will be referred to as the Circuit Divorce or Trial Judge.

Correlated Appeals with this Honorable Court shall be designated as “**R**” as set forth in record on Appeal transmitted by the Clerk of the Lower Court.

References to the Appendix accompanying this Initial Brief will be designated as (**A**), **and/or** followed by the Appendix Index Number and associated **DIN** or Page Number.

## **TABLE OF CONTENTS**

<b>I.</b>	<b>JURISDICTION</b>	<b>1</b>
<b>II.</b>	<b>INTROCUCTION - DESIGNATION</b>	<b>2</b>
<b>III.</b>	<b>TABLE OF CONTENTS</b>	<b>3</b>
<b>IV.</b>	<b>TABLE OF AUTHORITIES – CITATIONS</b>	<b>4-5</b>
<b>V.</b>	<b>PREFACE</b>	<b>6-17</b>
<b>VI.</b>	<b>SUMMARY OF ARGUMENT</b>	<b>18-23</b>
	A. The Circuit Court Erred in its Interpretation of Florida Statute 741.30 by Issuing the Temporary Injunction – <b>DR21-1577</b> .....	<b>18-23</b>
	B. The Circuit Court Erred in Issuing The Final Judgement Of Injunction – Domestic Violence With Minor Children (After Notice) <u>Without</u> Making Any Sufficient Factual Findings – <b>DR21-1577</b> .....	<b>18-23</b>
	C. The Circuit Court Erred in Issuing the Order on Amended Motion For Temporary Needs, Temporary Spousal Support, Temporary Child Support And Exclusive Use AND Possession Of Marital Home <u>Without</u> Making Any Sufficient Factual Findings, Proper Generally Acceptable Accounting & Financial Standards, Based On Sworn Testimonies & Filings – <b>DR21-1650</b> .....	<b>18-23</b>
<b>VII.</b>	<b>STATEMENT OF THE CASE AND THE FACTS</b>	<b>24-31</b>
<b>VIII.</b>	<b>ARGUMENT</b>	<b>32-40</b>
<b>IX.</b>	<b>CONCLUSION - NATURE OF RELIEF SOUGHT</b>	<b>41-42</b>
<b>X.</b>	<b>CERTIFICATE OF SERVICE</b>	<b>43</b>
<b>XI.</b>	<b>CERTIFICATE OF COMPLIANCE</b>	<b>43</b>

## **TABLE OF AUTHORITIES – CITATIONS**

### **Florida Statutes**

Section 90.504	32
Section 415.1111	17 & 38
Section 741.30	19 & 30
Section 741.28	19 & 32
Section 741.29	19, 23 & 38
Section 742	19 & 23
Section 817.49	31
Section 825.102	14, 16-17, 19-25, 32, 36 & 40
Sections 837.02 & 837.05	23 & 30
Section 907.041	23 & 38
Section 943.0585	24 & 40
House Bill 775	16-17, 20, 25 30-32, 38-40

**FLORIDA CONSTITUTION** 16-17, 19-20, 23, 25-26 & 38

**UNITED STATES CONSTITUTION** 16-17, 19-23, 25-26 & 34

**UNITED STATES CODE – Title 18 – Section 242** 16, 18 & 23

**ADA of 1990/Elder-Justice Act of 2010/AEA of 1954** 17, 23 & 40

**Employee Retirement Income Security Act of 1974 - ERISA**  
15, 21, 28, 38 & 40

**CASES USED ONLY AS REFERENCES****PAGES**

<i>Kelly v. Colston</i> 32 So. 3d 186 (Fla. 1st DCA 2010)	<b>32-40</b>
<i>Canakaris v. Canakaris</i> 356 So. 2d 858 (Fla. 1st DCA 1978)	<b>32-40</b>
<i>Berki v. Berki</i> 636 So. 2d 532 (Fla. District Ct. App. 1994)	<b>32-40</b>
<i>Duchesneau v. Duchesneau</i> 692 So. 2d 205 (Fla. 5th DCA 1997)	<b>32-40</b>
<i>Clark v. Clark</i> 825 So. 2d 205 (Fla. 5th DCA 1997)	<b>32-40</b>
<i>Rosen v. Rosen</i> 696 So. 2d 697 (Fla 1997)	<b>32-40</b>

## **PREFACE**

The Appellant married the Appellee on October 16<sup>th</sup>, 2012 after more than *two* (2) years of courtship and engagement, shuttling between his native Lebanon and Ukraine (the Appellee's native country). The Appellee was raised in extremely poor-conditions, struggling since early age to barely survive and eat, with a violent, drunken and abuse father, leading her to quit school and move with her grandparents in a further-away village. The Appellant, convinced he had find the "perfect" woman to MARRY, who wanted to move to the US and start their life-together, filed ALL the necessary U.S. Immigration paperwork to obtain for the Appellee a Fiancée' Visa (K-1) and secured her arrival in Denver, Colorado at his then residence in Thornton, while working as a Managing Director (1990-2013) for the 7<sup>th</sup> U.S. largest utility, spanning 12 U.S. States and 5 Continents. Upon her arrival, the Appellant obtained the Marriage Certificate, and the Appellee *signed* (as Kurylo) the Prenup on October 13<sup>th</sup>, 2012, Postnup, (as Abboud), on April 4<sup>th</sup>, 2013, ***with her own legal counseling***. The Marriage Certificate was signed on October 16<sup>th</sup>, 2012 as the Appellant wanted to commemorate & honor his deceased parents' wedding anniversary. Throughout the dating, courtship,

engagement, adoption, and support for the Appellee entire clan & town, cost the Appellant over \$100,000, including “buying-out” her “contract” as an “entertainer-dancer” in the Appellant’s native Lebanon, where they actually met & eventually decided to get married and have a FAMILY in the United States of America. Although he tried for over **ten** (10) years, the Appellant wasn’t able to get the Appellee Lebanese Citizenship, due to “A Felony Charge”, for her “undisclosed’ and “sealed” Lebanese Record, prior to ever meeting the Appellant, which was NEVER disclosed to the Appellant or the US Immigration Services, prior to obtaining her “Green Card” and eventually US Citizenship through the Appellant!

As soon as the Appellant lost his “lucrative” job, with excellent benefits, retirements, pension and a \$2 Mil life-insurance, naming the Appellee as 80% Primary beneficiary and his **only** minor (at the time) daughter the other 20% beneficiary, due to Title VII Discrimination, the “Gold-Digger” Appellee, who had complained about the **20%** to the Appellant’s daughter to cover child and spousal support for his ex-wife, proceeded to verbally and physically abuse the Disabled Appellant, more than 25 years her senior, and ultimately escalated, when the couple who had moved to



Chattanooga, Tennessee (June 2013), the Appellant lost his job with TVA in May 2014, again due to Title VII Discrimination. The Appellant is potentially the most qualified utility employee in the entire country, and probably the world, due to his education (5 college degrees, 3 of which are masters, 8 National Certifications, including the highest nuclear security clearance given to a US civilian outside the US Navy), skills, business and professional acumen, experience and second-to-none job performance in all aspect of the electric and gas utility sphere. None of it seemed to “impress” ANY of the Florida Utilities (Jacksonville Electric Authority (JEA), NextEra – Florida Power & Light (FPL), Tampa Electric Company (TECO), Orlando Utilities Commission (OUC) and Progress Energy –now -Duke Energy, to hire the Appellant, after over 400+ applications between 2015-2017, when he moved his family (pregnant-Appellee, her mother (who he had paid and financially sponsored for her “Green Card” and 2 minor boys) to Jacksonville on June 1<sup>st</sup>, 2017. Between **September 2012** and up until **April 2023**, the Appellant was/is the only “bread-winner”, but this, too, didn’t “impress” the Appellee, as the verbal, physical abuse, with added “degrading-twists”, against the Appellant became more violent, not only in front of the three (3) minor-boys but also in front

of her own-mother (including the violent abuse of the minor boys). After securing the current residence at 46 Chandler Dr. (May 2019), albeit the objections of the Appellee-Mother as it's "too much" and "too big", although it, purposely, was "finished" with a mother-in-law Suite, the Appellant was able to secure a job in Atlanta with the Southern Company, but instead of starting his tenure with his employer, on March 1<sup>st</sup>, 2020, the Appellant was diagnosed with Stage 4, Burkitt's Lymphoma, with at-best, 20% survival rate. Burkitt's lymphoma is a very aggressive disease associated with HIV and HSV (Herpes), both rampant in Eastern Europe, and the Appellee has HSV and is a carrier. During the Immigration process to obtain US Citizenship for his oldest boy (Born in Ukraine) and the Green-Card for the Appellee, the Appellant was **completely disease-free**, had all his childhood vaccinations, whereas the Appellee had no immunity to ANY childhood diseases (born 1985 circa Soviet Union) and carries the HSV virus. That's the main reason, for the "Complete Family" to **BE**, took about Six (**6**) years so the Appellant could "vaccinate" the Appellee and her green-card holder mother (born 1962), so to protect the newborns from the "birth canal". While the Appellant is on Chemo, the Appellee turned her "tyranny" and

“savagery” on the oldest two boys, while the grandmother “punished” the youngest boy, which later, over and over for the past 33 months, prompted, at over \$150,000 in legal fees, to repeatedly request for a State-Approved Social Investigator! In addition, while on Chemo, the Appellant fearing for his boys’ wellbeing and upbringing, in case he’s gone, *removed* his name from all the bank accounts and assets, AND *changing* his will, at the Appellee’s insistence to make her 100% beneficiary, as “his only daughter was an adult now”. This will prove to be the biggest MISTAKE the Appellant ever made! As soon as he lost his job with the Southern Company (again Title VII & ADA Discrimination), and as soon the “*Believer*” beat Cancer (February 2021), the Appellee, “**Gold-Digger**” turned “**Black-Widow**”, who had stopped going with the Appellant to his Oncologist for further testing (*PET Scans*) 3-months Prior – to ensure he’s Cancer free – after six (6) Chemotherapy sessions, but insisting to send the immune-weakened Father of her 3 minor boys to a Covid-Infested Jail (911 Actual Recording August 30, 2021), and had increased the degrading of the Appellant (left the marital bedroom and leaving the Father to care for his young boys for hours in the evening till the wee-hours, 3-4 times a week), savagery, brutality and violence towards the Appellant

culminating on August 16<sup>th</sup>, 2021 when he indicated that he'll seek a divorce, physically and verbally assaulting him, causing damage (bruises) to his right knee & ankle. For three days, after the most up-to-date brutal physical attack, the Appellant was left without food or water, "prohibiting" boys to answer his cries for water so he can take his pain and immune-system meds, he reached out to Medicare asking for a "home-nurse" which was immediately approved. Once the Appellant told the Appellee to expect a Sheriff Deputy and a Humana nurse, the Appellee sent the oldest boy with some food and water, promoting the Appellant, only for the sake of his boys, to cancel the Medicare home-nursing-audit trip or filing Abuse Claims. This cancellation by the Appellant will later prove to be a MUCH BIGGER MSITAKE, as on August 30<sup>th</sup>, 2021, only one day after he opened a new bank account to transfer some of the marital cash ( \$160K+), to a new individual bank account, after the Appellee's constant refusal to re-add his name **AND** refusing to seek "marital counseling" after the "Lebanese Felony Discovery", the **Appellee**, **who's much younger, taller and stronger** initiated the brutal, savage and barbaric attack, with a very heavy purse-backpack the Disabled Elderly Appellant as soon as he arrived home from the bank,

and continued her vicious attack, even after the two oldest boys (terrorized, frightened & traumatized – STILL ARE) arrived from school, intentionally inflicting multiple (5) injuries, 3 of which are *now permanent on the Appellant!* **From the “pre-meditated” moment**, the Appellee picked up the phone to call 911, she *has and continue* to abuse Marsy’s Law, aided by her Attorneys Derri Lassiter Young and Regine Monestime, by committing numerous perjuries starting with her first “theater-story-account” to the 911 Operator, to responding “Bigoted” Deputies (Robert Forrest & Sydney Fultz), “CSI”, “Corrupt” DCF & Betty Griffin Employees, “Prejudicial” State Attorneys, Investigators & Sheriff Deputies, and then to Judges and the Courts, continuing **TODAY** with the same “Bigoted” State Attorney and the Circuit Divorce Court Judge! Although, the Appellee is seen on video, taking out over \$47,000 from still-joint accounts for two (2) days (August 31<sup>st</sup>– September 1<sup>st</sup> , 2021), and FINALLY admitting in Court (**February 16<sup>th</sup>, 2024**), Under Oath (over the objection and “prodding” by her Attorney Young) that she had at least **OVER \$140,000** (*Tax-Free Money – The Appellant STILL insists that the Appellee had over \$160K+ including accounts owned jointly by her and her mother, both in the US and Ukraine*) on September 1<sup>st</sup>,

2021 **PLUS** between \$1500-\$1750 **PER MONTH** (SSDI was increased over the past 2 years), effectively “pocketing” about **\$200,000+** (Tax-Free) between **September 1<sup>st</sup>, 2021 and April 1<sup>st</sup>, 2023, and adding about \$25K from Wal-Mart Employment until today, in addition to the \$1750 Monthly SSDI.** *The Prejudicial Presiding Divorce Court Judge, intentionally and deliberately ORDERED (UNDER THREAT OF INCARCINATION) the Appellant to CONTINUALLY RAID his IRA paying over \$120,000 (January 2023 – June 2024) in ILLEGAL AND CRIMINAL ORDERS in Direct Violation of the Florida Constitution and violating Florida Statute 825, “Protection for the Disabled-Elderly”!*

After hiring multiple attorneys (**Total Nine (9) up until March 2024**), and spending over **\$150,000** in attorneys’ fees, the Circuit Divorce Judges (Anthony & McGillin) WOULDN'T ALLOW the Appellant, even ONE Social Investigator OR a single visit home to retrieve his belongings, diplomas, heirlooms, Citizenship & Social Security documents and the Appellant, “**naively**” thought it was the Unjust and “friendly & chummy” relationship between Attorney Young and the Previous Divorce/Injunction Judge Anthony that led to the most “**INHUMANE & BARBAROUS**” Final Injunction (written by Attorney Young), issued November 7<sup>th</sup>, 2022 (**A-5**), that kept the

Appellant Disabled Father from seeing his minor boys until **DECEMBER 6<sup>th</sup>, 2022!** AND CONTINUES, EVEN TODAY with the **SADISTIC AND CRUEL** Judge McGillin, the Appellant-Father SAW, his three (3) Minor boys a **TOTAL OF SEVENTY-THREE (73) HOURS IN THE PAST 144 WEEKS! (A-5 – CLEARLY States NO LESS than 2 hrs per week!)**

FINALLY, ***a single video***, “constantly denied” by the Appellee and her Attorney including recorded Hearing **On November 2<sup>nd</sup>, 2022**, (Appellant still claims 3-4 such videos DO exist), SURFACED “exonerating” and “absolving” the Appellant from *ANY CRIME or VIOLENCE* against the Appellee or HIS MINOR BOYS, prejudicially levied against him as a ***“Ranting Arab”*** (**NO LEGAL VALUE WHATSOEVER BUT A CODE**), by Deputy Robert Forrest (*the Appellant have lived in the Southern US for over 41+ years had “met” and “engaged” the likes of Forrest a 1000 times over!*), **AS IT CONTINUES TODAY**, maliciously, brutally and willfully “harassed” and **intentionally** “threatened” by the Divorce Court Judge McGillin, albeit hiring **TWO** (2) new Attorneys as **ORDERED (November 22<sup>nd</sup>, 2023 and March 22<sup>nd</sup>, 2024)**, in direct violation of the Appellant’s Civil & Constitutional Rights, more so, **intentionally** committing 1<sup>st</sup>,

2<sup>nd</sup> and 3<sup>rd</sup> Degree Felonies, punishable by **Florida Statute 825**, (*the Divorce Court Judge McGillin stated on Record “ You don’t like it, APPEAL IT”! (A-1 & A-3)*)

When the Appellee FILED the ILLEGAL & FRAUDULENT Motion for Contempt, Violation of the Final Injunction and for Incarceration **(A-2, DIN 227 & 229)** dated December 11<sup>th</sup>, 2023 and the Appellant Responded **(A-2, DIN 232)** on December 12<sup>th</sup>, 2023, the Divorce Court Judge McGillin, immediately STRUCK the Appellant’s Response, on December 12<sup>th</sup>, 2023, violating the Appellant Due-Process, protected by the US & the FL Constitution. The Appellant had, diligently, tried (over thirty (3) – Divorce Attorneys) as of November 27<sup>th</sup>, 2023 to obtain Legal Representation, however, the Prejudicial and Intentional & Willful “Prosecution” of the “Vexatious” Disabled-Elderly preventing ANY of these well-qualified Attorneys to represent the Appellant, for fear of “scolding” and/or “intimidation”, as the Appellant sat in the Circuit Divorce Court of Judge McGillin and witnessed FIRST HAND the “censoring”, and “berated” of MANY well-represented individuals by well-respected Attorneys, including the Appellant last Attorney in January of 2023!

The ABUSE of the Disabled-Elderly Appellant, CONTINUES



TODAY, with DCF Employees, FL State Attorneys and the **St. Johns County Judges**, AND restricting the Appellant, to see his ***boys-his-life (in complete & utter horrific, horrendous & dreadful condition (Soviet Era Nightmarish))***, **for a total of “supervised” 73 hours in the past 1008 days!**, culminating in these UNJUST & MALICIOUS and PREJUDICIAL ORDERS (**A-5 & A-3**), including raiding and “pillaging” the Appellant’s **ERISA-Protected Retirement Accounts**, EVEN with **TWO (2)**, completely qualified and well-equipped Attorneys, AS ORDERED, by the SAME St. Johns Court System, “reminiscent” of times-long-past “True Banana Republics”, causing him **EXTREME** physical, psychological, emotional, financial hardship, not just violating **USC Title 18 Section 242**, but more so, the **willful and persistent intentional violation of Florida Statute 825**, FL HB 775 AND the US & the FL Constitutions, while costing him OVER **\$2,500,000** in lost income, retirement, life-insurance, and his “proudly-earned Nuclear Security Clearance” to **DR21-1577, DR21-1650**, *that’s why* the Appellant appealed & plan to appeal **ALL** the Lower Court Judges’ Orders, as they’re issued and CONTINUE TO BE ISSUED (**5D23-3383, 5D23-3455, 5D23-3463, 5D23-3482, 5D24-0799 & 5d24-0813 – (R)!**

The Appellant does NOT need ANY transcripts or recordings to argue FOR the Circuit Divorce Court Judge McGillin Recusal and Censorship, from EVER presiding in ANY Circuit or Divorce Court, as HIS OWN Actions, Statements and Orders over the past FIFTEEN (15) months, as a presiding Judge for many Hearings, are the TRUE Testament and Evidence for his Prejudicial and Utter Disrespect for the Law and the US & FL Constitutions. The "Vexatious Order" of nine (9) pages filled with Prejudicial, Biased, Cruel, Sullen AND Discriminatory "ranting" statements VOID of ANY LOGIC OR EVIDENCE but speaks VOLUMES of prejudicial wrath, rage and anger, truly INHUMANE "Reminiscent of Long-Gone Banana Republic Band of Justice! **The "Ranting Arab" Continues to LIVE in FEAR, as the Divorce Court Judge McGillin has SHOWN HIS TRUE NATURE, OVER AND OVER! Even as the Appellant returns from overseas travels, and his US Passport was "red-tagged" at New York's JFK Airport on May 28<sup>th</sup>, 2024!** It ALL culminated when the Divorce Court Judge McGillin stated, in open Court: "*Why do you think I'm a Racist and don't like you?*" One Question for this Honorable Court: "*Would Judge McGillin ever dare to ask a Jewish or Arab Muslim Person WHY he/she thinks he's Anti-Semitic??!*"

### **Allowing the Appellant to “Acquire” and “Present” EVIDENCE**

(from the marital home, albeit three (3) Honorable Judge’ Orders to do so), as Required, by Statutes – DR21-1577 **(A-5)**. The Prejudicial and Criminal Final Injunction gave the Appellant **ZERO (0%)** Time Sharing with his minor boys but more importantly NO Spousal and/or Child Support as the Circuit Court Judge was made aware, repeatedly by Six (6) attorneys, of over \$160,000 in Marital Assets (only controlled by the Appellee as of September 1<sup>st</sup>, 2021). The Final Injunction clearly noted that the Appellee is STILL unemployed **as of MAY 31<sup>st</sup>, 2024**, although the Appellee admitted in Court, under Oath, that she didn’t GAIN any employment until April 10<sup>th</sup>, 2023, and more importantly NEVER notified the Court (although her attorney Derri Lassiter Young was informed of this employment and Failed to notify the Court, albeit the **“THEFT”** of over \$25,000 in Attorneys’ Fees which continues today!). The “bigoted” St. Johns Sheriff AND the State Attorney, used this “undocumented/filed” employment to continue the USC Title 18, Section 242, Willful and Malicious Prosecution AND the Criminal Acts against the Disabled Elderly Father when they “reneged” on the Expungement Consent on June 16<sup>th</sup>, 2023 and **immediately**

filed **NEW** Criminal Charges (**23-1194MMMA**) (**A-7**), that was used AND continue to be used by the Divorce Court Judge to commit more Criminal Acts under Florida Law and the FL Constitution!

**Although the Appellant exposed and documented the “lies” “perjuries” and “abuse” of Marsy’s Law by the Appellee and her attorney Derri Lassiter Young (A-8) in multiple filings, and mainly at the Hearings on August 14<sup>th</sup>, 2023, October 12<sup>th</sup>, 2023, and October 18<sup>th</sup>, 2023 (coincidentally when ALL the Defendants in US - FL Middle District 3:22-CV-1204 were “served” minutes prior with FEDERAL SUMMONS), on November 13<sup>th</sup>, 2023, the Honorable Circuit & Divorce Court Intentionally & Maliciously violated the Florida Constitution when it ***Erred*** in Issuing “Order On Amended Motion For Temporary Needs, Temporary Child Support And Exclusive Use And Possession Of Marital Home”, fallaciously detailing (1) Inaccurate, false, prejudicial assumptions & claims about the Appellant’s -, (2) Non-factual prejudicial assertions in favor of the Appellee, unaudited financial statements by the Appellee and her Attorney’s billing statements - AND (3) **completely inaccurate and erroneous Appendix A (A-2, DIN 174)**. The Divorce Court did indeed, purposely abused its**

*discretion, committed Criminal Acts in violation of FS 825, and basic mathematical principles and “employed” **non-factual biased, prejudicial and criminal** assertions and statements!*

**The assault, abuse and violations of the Elderly-Disabled Father Appellant’s FL & US Constitutions and Laws continued on November 22<sup>nd</sup>, 2023, the Circuit/Divorce Court Not Only Erred when it “tabled” the CA22-1450 Case (A-8) (directly related to DR21-1650 (A-6), DR21-1577 (A-5), but continued the Criminal “onslaught” on the Appellant’s Constitutional and Civil Rights (mainly FS 825) in Issuing “Order Determining Respondent To Be A Vexatious Litigant And Ordering Counsel (A-1). The Honorable Circuit Court already knows that the Appellant had multitude of attorneys, at a cost of over \$150,000 from his Retirement Account, and he’s no better today than he was on August 29<sup>th</sup>, 2021, vis-à-vis the Appellant’s minor kids’ *rearing, nurturing, educating & upbringing (HB 775)*, the only bright spot in this marriage, that ever mattered to him!**

***The Prejudicial Criminal Assault by the District/Divorce Court Judge against the Disabled-Elderly Father Appellant continued, even with his new attorney, AS ORDERED, during***

***the Hearings on February 9<sup>th</sup> and 16<sup>th</sup>, 2024, culminating into the most “brutal”, “vicious”, “ruthlessly Criminal” Act, “doubling-down” in issuing, on March 22<sup>nd</sup>, 2024 (5D24-0799) (A-3), the “Order on Emergency Motion for Contempt and Enforcement and Request for Attorneys’ Fees AND Order on Emergency Motion for Interim Attorneys’ Fees violating the Court’s OWN prior Orders, and Criminally, violating FS 825 and the FL Constitution, by “threatening” to “incarcerate” the Disabled-Elderly with weak immune system unless the Appellant, “intentionally ignoring the admission of over \$140,000 in Appellant’s Marital Assets, in direct violation of ERISA, CONTINUE RAIDING his Retirement Funds to pay over \$18,000 “back child support”, based on the Appellee’s Attorney UNAUDITED, “Crooked”, “Forged” and “Fraudulent” fees dating back to September 5<sup>th</sup>, 2021, when Attorney Derri Lassiter Young, called the Appellant Camille A. Abboud to “connect” with the “Wife”! At the February 16<sup>th</sup>, 2024 Hearing, the Appellee to the “dismay” of her “crooked” and “criminal” attorney, admitted that as of August 30<sup>th</sup>, 2021, she had CONTROL of AT LEAST \$140,000 (Tax Free).***

***In February 2023, the Appellee “stopped” paying the Mortgage, WITHOUT ANY NOTICE, effectively almost losing the Marital Home, if it wasn’t for the Appellant-Father immediate legal intervention! This latest “Criminal Order” by the Divorce Court Judge contains “promises” and “threats” for more future and continuous “Theft” from the Appellant’s Retirement Account and eventually his kids’ College Funds! It is worth noting that since September 15<sup>th</sup>, 2021, the Appellee and her “Criminal” Attorney “tried to sell the Marital Home in AN AUCTION (A-6)! The Appellant, through multiple attorneys and as a Pro-Se Respondent (10+), made many OFFERS to support his minor boys, pay the entire Mortgage and Utilities (\$3000) plus \$1000/month, if and only if, the Appellee and her attorney Young ADMITTED that the Appellant’s Family is and still receiving about \$1750/month from the Appellant’s SSDI, thus a total of \$5750 per month, far exceeding ANY of these “Criminal” and “Barbaric” Orders, ALL to just HAVE A NORMAL LIFE WITH HIS MINOR BOYS! None of these Offers BENFITING the Minor Children were EVER submitted, or SEEMS TO FASE, the Divorce Court Judges since August 30<sup>th</sup>, 2021!***

## **STATEMENT OF THE CASE AND FACTS**

By way of background, on August 30<sup>th</sup>, 2021, the Appellee, using a heavy purse-backpack along with her bigger and stronger stature, assaulted and kicked both sides of the Disabled Elderly Appellant's body and head, with intent to inflict harm and kill, as evident on the 911 recording, asking the operator to "take him to jail as he has guns and would kill me and my kids at night". Thus the Appellee, effectively, in addition to violating *FS 741.28, FS 825.102, FS 817.49*, committed perjury and "assisted" Deputy Forrest, by the mere mention of "made threats to me in Arabic", who, immediately "obliged" to violate HIS OATH, violated the Appellant's *US and FL Constitutional Rights, the ADA Act of 1990, the Elder-Justice Act of 2010, the Atomic Energy Act of 1954, and willfully, under Oath, **committed Felonies** by violating FS 741.29, FS 825.102, FS 907.041 (4) (c) & (h) and then violated USC Title 18, section 242, NO Miranda*, by "forcibly", removing the Appellant from his clinic on August 30<sup>th</sup>, 2021, ignoring his plea for pain and assertion of multiple injuries and that the "witness" is the minor child with a video-phone (theater continues) belonging to the Appellant (thus giving Deputy Forrest access) but instead sends



him, assisted and “aided” by a “bigoted” Flagler’s Hospital ER Attendant, Timothy Ward, to a Covid – Infested Jail with the five (5) injuries and an extremely fragile Immune System (Not even six (6) months since his last PET Scan). Deputy Forrest and Flagler’s ER Attendant Timothy Ward (*stated in front of “stunned” nurses: “I’m not going to help your case against your wife”, once he learned that the Appellee is a White Woman!*), set in motion the commission of committing 1<sup>st</sup> & 2<sup>nd</sup> Degree Felonies under FS 825, and perpetrated Medicare Fraud (wasn’t uncovered until June 2022), left the Disabled-Elderly Father, now, with three (3) permanent injuries resulting from the brutal, cruel & vicious attack by the Appellee **(CA23-1513 – A-9)**. The Appellee, on September 3<sup>rd</sup>, 2021, and after “illegally taking the Appellant’s vehicle from the clinic”, delivered, from her own SAFE, the “guns and ammunitions” (claimed on the 911 Call) to Deputy Dixon, who refused to allow the Appellant to retrieve his clothing, personal belongings, “tools of the trade”, heirlooms, meds, Medicare-issued supplies, and most of all, files and items belonging to the Appellant’s adult significant others (and his adult daughter), including citizenship, tax and “nuclear-cleared” documents (still in the possession of a “foreigner” with NO

Clearance WHATSOEVER) from the Appellant's SAFE, stating" Your wife said you're too smart and scheming to take ANYTHING", thus successfully "obliged" "the unsuspecting simple" Deputy to violate two (2) Judges' Orders, by then!

The Divorce Court, did indeed intentionally **ERR**, first on September 8<sup>th</sup>, 2021 in their interpretation of *Florida Statute 741.30* by issuing the Temporary Injunction, ignoring the "Ranting Arab" Appellant's *Civil, Constitutional and Fathers' rights (HB775)* and "failed" to follow-through on the Trip Home to retrieve over \$150K in *heirlooms and personal assets, thus committing criminal Felonies under FS 825*. Then AGAIN **ERRED**, after receiving the Appellant's Email on September 18<sup>th</sup>, 2021, at the Hearing on October 25<sup>th</sup>, 2021 (far more than the 15-day allowed by Statute) by not allowing the Appellant to "retrieve", from the marital home, his evidence and belongings of past abuse and torture by the Appellee against him and the minor boys, in accordance with *Florida Constitution*, effectively giving the Appellee "free rein" to his nuclear-cleared, social security and tax documents, involving multitude of private adults. Finally, the Circuit Divorce Court **ERRED**, again, in Issuing The Final Injunction Temporary Injunction Without Making Any

Sufficient Factual Findings at the Hearing on November 2<sup>nd</sup>, 2022

OR allow the Appellant to present ANY evidence OR allowed home to retrieve OR the Email from DCF “exonerating him”, violating his

*Florida and US Civil, Constitutional and Fathers’ Rights, thus committing additional Felonies under Florida Statutes. Final*

Injunction **(A-5)**, as written by Attorney Young, at the request of

Judge Anthony, although **criminally** prejudicial and inhumane,

was signed with the Appellee as UNEMPLOYED, which ultimately

led to more criminal charges **(A-7)** by a zealous and bigoted Sheriff

and State Attorney, (*who insisted three times on Jail-time in addition*

*to probation leading to the Appellant to lose his JEA job, albeit at 40%*

*of his usual salary*), USED, by the Appellee’s Attorney to **prejudice**

the Court of Judge McGillin, as Attorney Young, in addition to

committing perjuries, violated the *Appellant’s Constitutional & Civil*

*Rights*, and “portrayed” the Appellant as violent, “sue-happy”

litigant, “consorting” with one or more of his defense/divorce

attorneys, essentially leading to the Divorce Trial Court’s **(A-2)**

UNJUST, LEGALLY FLAWED AND UNCONSTITUTIONAL Orders

issued November 13<sup>th</sup>, 2023 **(5D23-3383) (R)**, again on November

22<sup>nd</sup>, 2023 **(5D23-3463) (R)**, and again on March 22<sup>nd</sup>, 2024 **(5D24-**

**0799) (R)**, all now appealed with this Honorable Court. The Divorce Judge McGillin had multiple opportunities, on March 29<sup>th</sup>, 2023, August 14<sup>th</sup>, 2023, and again October 18<sup>th</sup>, 2023 to “reopen” and “fix” the INJUSTICE committed by Judge Anthony, but instead “continued” his ASSAULT on the Disabled-Elderly Father by stating over six (6) times over the past year, that he’d rather not “deal” or “entertain” a “Pro Se” Litigant, Respondent or Petitioner, without “a *Captain of the Ship*”?!! Thus AGAIN violating the Disabled-Elderly Father’s Constitutional & Civil Rights, afforded to him by BOTH the US & the FL Constitutions and Laws,

The Temporary and subsequent Final Injunction Orders **(DR21-1577)** turned out to be the “root of all evil”. The Appellee and *her Attorney*, used and abused Marsy’s Law (although the lone “exonerating video” and the DCF “exoneration Email” were FINALLY obtained **months** before the 2<sup>nd</sup> Hearing on November 2<sup>nd</sup>, 2022, leading Judge Anthony to Issue the UNJUST & INHUMANE Final Injunction Order (mainly restricting a loving-devoted Disabled-Elderly Father “supervised” access to his minor boys for a **TOTAL of Two (2) per Week**), leading to **73 Total Hours** over the **past 1008 DAYS** with his minor boys! **HAD** the Divorce Judge McGillin

“watched” the multitude of videos-evidence from August 30<sup>th</sup>, 2021 and until February 16<sup>th</sup>, 2024, Judge McGillin wouldn’t have **committed criminal felonies** in his Orders starting on November 13<sup>th</sup>, 2023 and continued today on March 22<sup>nd</sup>, 2024, to include a Direct Threat to “violate” ERISA and Order the “Larceny & Pilfering” of the Disabled-Elderly Retirement Accounts to pay the FELONS, the Appellee and Attorney Young!

The Divorce Courts (**DR21-1577, DR21-1650, CA22-1450**), *for more than **30+ months*** of more than two-dozen filings, motions, pleadings, “skipped” over **three (3)** simple facts/lies: The Appellee has **NO FUNDS<sup>1</sup>** (Petition for Temporary Injunction – **(A-4) - DR21-1577 DIN 1**), **Attorney Young<sup>2</sup>** was hired **September 5<sup>th</sup>, 2021**, (see Young’s billing) and yet called the Appellant on September 20<sup>th</sup>, 2021 “to finally meet the WIFE – See latest filing – Emergency Hearing for **Incarceration (A-2, DINs 227 & 229)** – Still refers to the Appellee as the HUSBAND and the Appellant as the WIFE), and the Petition for Dissolution of Marriage **Filing<sup>3</sup> (September 15<sup>th</sup>, 2021 - DR21-1650 & CA22-1450 (A-6 & A-8)** to **SELL THE MARITAL HOME AT AN AUCTION** and Refusal to Allow the

Appellant to re-finance the marital home at **2.25% Fixed, 15-year Mortgage Rate, the lowest, ever in the US** (UPS Overnight – Still Unopened and Undelivered to the Appellant until **late 2022**, when Mortgage Interest Rates skyrocketed).

Throughout the past year, since the Appellant, decided, after several attorneys and at a cost of over \$150,000 with no HUMANE outcome for his minor boys, to represent himself as Pro Se, had filed for the Expungement of his Record (*to retain his lucrative nuclear security clearance*), motions, pleadings, responses and requests for re-hearings, and personally (or by Zoom) attended ALL hearings, for ALL his cases. At every hearing or filing or law-enforcement testimony, *the Appellee and her Attorney Young, continued the perjury*, submitting false sworn financial documents **(A-2, DIN 257)**, actions (*the long theatrical movie that started on August 30<sup>th</sup>, 2021 continues by the Appellee standing far behind the Appellant at every hearing (except Divorce Court), “holding back” the Appellant with a broken knee, while she “makes her exit”*, CONTINUES to Perjure Herself by making false accusations without any proof whatsoever, and continue Assault on the Appellant, in direct violation of *Florida Statutes 741, 775, 825, 837, and HB 775.*

The Divorce Court Judge McGillin is well aware that in early February 2023, the Appellee **stopped paying the mortgage, utilities** (with over **\$200K** in bank accounts) and over \$1750/Month SSDI and ALL the Child Credits for 2021, 2022 & 2023, thus forcing the Appellant to seek legal remedies against the mortgage company and Utilities' providers, to keep the low-interest on his mortgage & the Utilities *ON for the family*, which included the Appellee & her Mother, in addition to his minor boys, ***who still, to this day, are not allowed ANY ELECTRONIC DEVICES reminiscent of the Soviet Era!*** All of these ORDERS by the Prejudicial Circuit Divorce Court against the Disabled Elderly Father, the continued "theatrical" abuse of Marsy's Law, "proved" to the Disabled Elderly Appellant-Father, that the St. Johns County Court System is nothing more than just "A Banana Republic"!

Although the Appellant hired two (2) new dedicated, extremely capable attorneys for DR21-1650, nonetheless, Judge McGillin CONTINUES to issue his UNJUST, INEQUITABLE AND PREJUDICIAL Orders up and including the **March 22<sup>nd</sup>, 2024 Order (5D24-0799) (R) (A-3)!**

## **ARGUMENT**

Ever since March 29<sup>th</sup>, 2023, at the Appellant first appearance as a Pro Se Respondent, **respectfully** asked the Honorable Court Judge McGillin to examine and professionally audit ALL the filings, petitions, pleadings, responses and associated documents relating to the Divorce (**DR21-1650**) and Injunction (**DR21-1577**), specifically the “effect” of the newly discussed **HB 775** (amended **FS 742**), “This Bill makes it that, even UNWED fathers, who acknowledged paternity, are entitled to more than just a child support obligation but they are entitled to visitations, and to be INVOLVED in ALL essential decision-making for their child. Simply put, these fathers are to be SEEN on equal footing as the mother in the eyes of the Law”. But all the Appellant heard on that day, and subsequent Hearings, as he was “hurried” out, six (6) times “to go get an attorney”! After **multiple generous and devoted-father** “offers” for extensive child-support, thousands in clothing, toys, and electronics, plus the \$10,000 (from **SP22-508**), filing taxes (Amend 2021, 2022 and current 2023) as a married-couple (netting the Appellee \$15-\$25K, far exceeding her total legal bills since August 30<sup>th</sup>, 2021), pay her legal bills, payment of the entire mortgage plus



utilities (since February 2023 and continues today), and including Roth IRA and retirement for the Appellee (regardless of the Colorado iron-clad Prenup & Postnup), and commitment to “drop” the Social Investigation & even **CA22-1450**, which was Ordered to be Amended again, the Appellee and her Attorney, WERE ONLY met with “resume supervised visits for 2 hrs a week, “intermittently”, (73 Hours in the past 144 WEEKS), without Rhyme OR Reason!

**ISSUE 1** – *“After protracted litigation and delay, a Final Injunction was NOT issued until November 7, 2023”*. ALL the delays leading to postponing the MEDIATION (**A-2**) until December 21<sup>st</sup>, 2022 were DUE to the disrespect, unresponsiveness and illegal perjuries of the Appellee and her Attorney – The main reason ALL Seven (7) attorneys of the Appellant “quit” (documentation emails, video-recording of hearings, filings, petitions and counter-petitions, pleading, preferential treatment by both Judges *Anthony & McGillin*). The Divorce Court Judges **Erred & Abused the Law** when it didn’t assign blame, **where it belongs**, whatsoever, for the Injustice and Inhumane treatment of the Disabled Elderly Appellant-Father (FS 741, 825 & HB 775)!

**Issue 2** – *“Allegations against the Appellant of overseas accounts and failure to pay household bills until recently,”* are not only Prejudicial, without ANY evidence whatsoever, but are “fictional” & “inaccurate” as well. The Appellant has been paying \$2400 for the Mortgage, Taxes and Insurance since February 2023, more than a year, PLUS his Rent of \$2400+, and continues TODAY!

**Issue 3** – *Injunction Violations:* The Honorable Divorce Court **Erred** again, as the petitions/pleadings/Federal Claims “confirms” the perjuries of the Appellee’s and her Attorney. Again, the Divorce Court was *PREJUDICIAL* and “failed” to “recount” its own WORDS at the August 14<sup>th</sup>, 2023 Hearing “perjury onslaught” and then Ordering a Social Investigator AND Trip Home (**For the 4<sup>th</sup> time**) (**A-6 DINs, 166, 168, 169, 170**).

**Issue 4** – *The “Intermittent” Visitation and Cut-off on multiple occasions – due to tyranny, threats and “terrorizing”* (by order from the Appellee-Mother-Tyrant) of the younger boys, if and when they showed ANY affection and thanks towards their loving Father, simply because of UNLIMITED LOVE!. This “Tyranny”, “Abuse & “Terror” imparted on ALL the minor boys, by the Appellee, continues **TODAY**, as of the last visit on **March 28<sup>th</sup>, 2024** (once

the documented reports from the Playful Family are obtained, it will be submitted to the Divorce Court (**DR21-1650**) by the Appellant's NEWLY hired Attorney).

**Issue 5** – Contrary to the Statement by the Divorce Court Judge McGillin, the Appellant was ONLY allowed, **ONE (September 3<sup>rd</sup>, 2021)** visit that lasted less than 25 mins to retrieve very little of his belongings when the Appellee INSTRUCTED the Deputy, in violation of the Court Order, that NOTHING from the office or the master bedroom is ALLOWED! Most belongings, medications, heirlooms, US Citizenship papers, SSDI documents, private and nuclear privileged and confidential documents, “Tools of his Trade”, “Guns & Ammunitions” (***Divorce Judge McGillin stated on November 22<sup>nd</sup>, 2023: Go to the Federal Court and get your 2<sup>nd</sup> Amendment Right Restored!***), Medicare-owned devices, property & documents belonging to private citizens, and many other valuable items and documents remain “confiscated” including the latest request made to Judge McGillin at the **February 9<sup>th</sup>, 2024** Hearing! The Appellant is now convinced that **OVER \$425K (his INCOME after Tax Feb-2020-Feb-2024), even his Diplomas, Nuclear Certifications are now “Confiscated Marital Property along with**

**HIS GUNS & Ammunitions”,** as told to the Appellant, over and over, by the ENTIRE St. Johns County Court System. ***As such, the abuse of “Marsy’s Law” continues in this “Banana Republic”!***

**Issue 6** – Contrary to the Statement by Divorce Court Judge McGillin, the Appellee had more than **\$150-160K**, (Tax-Free, ALL OF IT from the Appellant) on August 30<sup>th</sup>, 2021. Never WANTED a job, although she’s an able legal body, along with her mother (who lives at the marital home free of charge for the past 8 years), albeit uneducated, could have gotten jobs and supplemented their income (SSDI - **\$1750/month plus** child tax credits). Additionally, the Appellant has been paying both \$2400 Mortgage since February 2023 and \$2400 for his own Rent. Fifth Grade Math IS the “confusion” and “computational” error, causing the Circuit Court to issue this UNJUST Order for OVER **\$54,500** in ARREARS (*What Happened to Marital Assets?!)*

**Issue 7** – The Appellant requested, since responding to the Divorce filing (**A-6 DIN 18**) and on multiple occasions in filings, at-hearings, that the Appellee PROVIDE the Complete Monthly Banking Statements (from ALL the Banks), to include in her “Fabricated” Financial Disclosure over the last **four (4) years**,

dating to the Appellant's Cancer diagnosis in February 2020, and up until February 2024. The Appellant confirms that the "Marital Income" exceeded **\$425K** (Tax Free) in various bank accounts but yet the Appellee continues to perjure herself, claiming over **\$116K** in Legal bills, and about **\$9K** DEFICIT per month, "failing" to disclose & include **\$1750**/Month from the Husband's SSDI.

Additionally, the Appellee claims to have started working at Wal-Mart, in April 2023, (\$17/HR – still even with "a promotion" claimed for continually "changing" the schedule and/or "skipping" on the 2 HR ***per week*** for the boys with their Father – **NOW TOTAL 73 HOURS OVER THE PAST 1008 DAYS!**. So simple math will work out, assuming no over-time or pay-increase due to the "Promotion", to roughly about **\$25K**, net of taxes and other withholdings, plus the **\$1750 SSDI**, for a total of about **\$200K (Including \$160K)**. ALL of the Appellee's Financial Disclosures, submitted for the past 2.5 years, are *fraudulent, falsified & fabricated*, not to mention *IRS violations, using the minor kids as Dependents!*

**Issue 8 – Contrary to ALL the statements (about "many claims") by the Divorce Court Judge McGillin in each of his ORDERS, EVERY filing, statement, petition, response, BY THE**

NUCLEAR-CLEARED APPELLANT IS TRUTHFUL AND UNDER OATH! EVERYTHING THAT THE APPELLANT STATED IN WRITING OR IN COURT IS NOTHING BUT THE TRUTH AND CAN BE PROVEN! The Appellant filed (his then attorney) Financial Disclosures on January 29<sup>th</sup>, 2023, as well as Updated Financial Affidavits August 18<sup>th</sup>, 2023 and, more importantly & evidentiary, Respondent's Amended Financial Disclosure on September 7<sup>th</sup>, 2023, effecting his JEA job loss (\$8,625.06 monthly) but affirming the appeal of his SSDI (\$3,258.00) as being approved but will take 30-60 days (SS works really slow). The SSDI reinstatement FACT seems to be AMISS by the Honorable Court Judge (again at the February 9<sup>th</sup>, 2024 Hearing and the UNJUST recent Order on March 22<sup>nd</sup>, 2024 (5D24-0799 (R)) when recalculating the income for the Appellee (about \$1750 per month for her and the 3 minor boys). **As a matter of fact**, the SSDI was reinstated on **December 8<sup>th</sup>, 2023**, as the Appellant predicted and confirmed in all his filings, and SS did INDEED pay back the "ERREARS" SSDI (**3 months**) for the ENTIRE FAMILY (**That's over \$5K**), but yet still the Appellee and her attorney, continue the perjury by not "admitting" or "filing" these SSDI payments! The Child Support Guideline Worksheet, is

full of *unaudited and erroneous calculations*, stating untruthfully that the Mother filed as Single – completely a lie (exposed at the August 14<sup>th</sup>, 2023’ Hearing) – The Appellee filed, illegally, in violation of the IRS Laws as a” Head of a Household” to receive the “lucrative” child credits! The Appellant Father, as the only income-producing parent since October 2012 and up until December 2023, as a Married-Filing SEPARATELY (due to non-response by the Appellee, potentially leaving \$15-\$25K with the IRS)! In order to “setup” the Appellant (*Injunction Violation*), with her Wal-Mart job, she failed to notify the Court of her income, until months LATER, and again & again, **up until February 9<sup>th</sup>, 2024**, the Divorce Court Judge, JUST TO BE FAIR, should have BUT failed to request Monthly Financial Statements from ALL THE BANKS (Appellee & her Mother, in the US & Abroad), for the Past **Four (4) Years from February 2020 – February 2024**, re-calculate the Appendix Spreadsheet in this UNJUST and UNLAWFUL Order, AND more importantly, should have used these Hearings to CHANGE the Final Injunction (**A-3**) for the sake of the Disabled-Elderly Broken-Hearted Father BUT instead “threatened” at the February 9<sup>th</sup>, 2024 HEARING, WITH THE APPELLANT’S NEW ATTORNEY PRESENT,

**TO DISMISS the Appellant's Claims, and "Held the Appellant's in Contempt of Court for this UNJUST and CRIMINAL Order, threatening, again and again, of Jail time AND Fines, unless the Appellant "raided" his Retirement Account to pay more than \$18,000, in direct violation of ERISA, Elder-Justice Act of 2010 AND the *FL Constitution Article 2, Sections 8, 9 & 11 and Florida Statute 415, 741, 825, 907, 943 and HB 775!!***



## **CONCLUSION**

THE CIRCUIT TRIAL COURT ERRED, ABUSED AND CRIMINALLY VIOLATED THE LAW, AS RECENTLY AS MARCH 22<sup>nd</sup>, 2024, IN IGNORING THE APPELLANT'S ORIGINAL TIMELY REQUEST FOR AN EMERGENCY REHEARING FILED NOVEMBER 16<sup>th</sup>, 2023 WITH DETAILED EXCEPTIONS AND RECOMMENDATIONS, THEREBY ERRONEOUSLY TREATING THE NOVEMBER 13<sup>th</sup>, 2023 LOWER TRIBUNAL ORDER AS ESTOPPING APPELLANT FROM SEEKING PROPER RECALCULATION OF THE CHILD SUPPORT WORKSHEET WITHOUT ARREARAGES, ORDERING THE ASSAULT AND RAIDING HIS RETIREMENT ACCOUNT FOR PAYMENT OF THE APPELLEE'S FRAUDULENT CHILD SUPPORT AND THE "UNNECESSARILY" AND "FRAUDULENT" MOUNTING LEGAL EXPENDITURES WITHOUT REASON AND PAYMENT OF THE ENTIRE MORTGAGE OF THE MARITAL HOME WITHOUT "SUBSTANTIAL REAL UNENCUMBERD ACCESS, COMPANIONSHIP, AND TIME SHARING" FOR HIS MINOR CHILDREN AS DETAILED IN THE **HB775** AS OF JULY 1, 2023.

**REVERSED AND REMANDED WITH DIRECTIONS.**

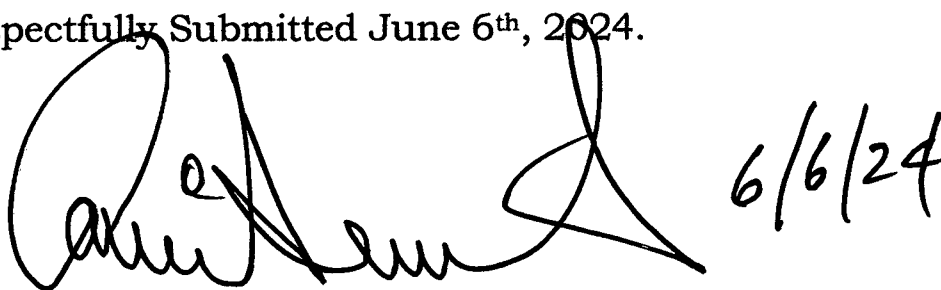
## **NATURE OF THE RELIEF SOUGHT**

**WHEREFORE**, Appellant, respectfully requests this Honorable Court GRANT the Petition for Recusal and Removal of the Honorable Circuit Divorce Judge and Issue A Writ of Prohibition Disqualifying the Honorable Trial Court Judge McGillin for ALL the Appellant Cases (DR21-1650, DR21-1577 & CA22-1450), GRANTING the Appellant Stay AND Halt the latest Order on March 22<sup>nd</sup>, 2024 (5D24-0799) and an Order remanding ALL these cases to the Circuit Court for

reassignment to another Judge and provide any Other Relief this Honorable Court deems just and proper, including Criminal Charges in accordance with Florida Statute 825.

As for Attorney Derri Lassiter Young, "The Motion To Incarcerate the Disabled-Elderly Immune-Weak Appellant" for NON-PAYMENT of Child Support Without Proper Confirmation of the Continued SSDI PAYMENTS today for the Family (Including In Arrearage of ABOUT \$5000) is in direct violation of FL Constitution and Florida Statute 825, an ORDER for Disbarment from the Florida Courtrooms for LIFE and provide any other relief this Court deems just and proper.

Respectfully Submitted June 6<sup>th</sup>, 2024.

A handwritten signature in black ink, appearing to read 'Camille A. Abboud', followed by the date '6/6/24' written in a similar cursive style.

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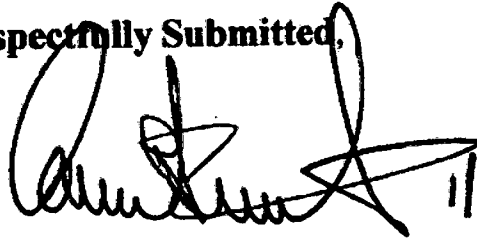
Camille A. Abboud  
Pro Se Appellant  
100 Audubon Place  
Suite 1420  
Saint Johns, FL 32259  
[camilleabboud2013@gmail.com](mailto:camilleabboud2013@gmail.com)

## **CERTIFICATE OF SERVICE**

I HEREBY CERIFY that a signed and true copy of the foregoing has been furnished this 16<sup>th</sup> Day of January 2024, to Florida E-Filing Portal to the Appellee's Attorneys on Record with the Florida 5<sup>th</sup> District of Appeal: Derri Lassiter Young, Esq. at derri@lassiterlawyers.com, Regine Monsetime, Esq. at themonestimefirm@gmail.com and the Honorable Judge Howard O. McGillin at hmcgillin@circuit7.org.

The Appellant did NOT serve the Appellee's Personal Email as it might constitute a Violation of the Injunction (DR21-1577), since the Appellee **DID NOT** enter an appearance with the Florida 5<sup>th</sup> District **OR** the St. Johns County Court as a Pro Se litigant (See Attached).

Respectfully Submitted,

 1/16/24

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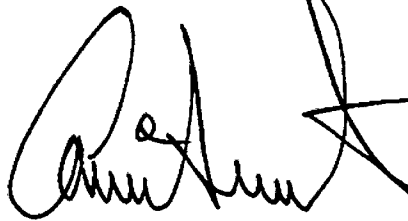
Name: CAMILLE A. ABBOD  
Address: 145 Ascend Circle - Suite 3201  
Saint Johns, FL 32259  
720.480.0090

### **CERTIFICATE OF SERVICE**

I HEREBY CERIFY that a signed and true copy of the foregoing has been furnished this 14<sup>th</sup> Day of May 2024, to Florida E-Filing Portal to the Appellee's Attorneys on Record with the Florida 5<sup>th</sup> District of Appeal: Derri Lassiter Young, Esq. at derri@lassiterlawyers.com, Regine Monsetime, Esq. at themonestimefirm@gmail.com and the Honorable Judge Howard O. McGillin at hmcgillin@circuit7.org.

*The Appellant did NOT serve the Appellee's Personal Email as it might constitute a Violation of the Injunction (DR21-1577), since the Appellee DID NOT enter an appearance with the Florida 5<sup>th</sup> District OR the St. Johns County Court as a Pro Se litigant.*

Respectfully Submitted,



5/14/24

Name: CAMILLE A. ABBOUD  
Address: 100 Audubon Place - Suite 1420  
Saint Johns, FL 32259  
720.480.0090

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA  
FIFTH DISTRICT

Camille A. Abboud,

Appellant(s)

v.

Iryna R. Abboud,

Appellee(s).

Case No.: 5D2023-3463

L.T. No.: 2021-DR-1650

---

Date: May 10, 2024

**BY ORDER OF THE COURT:**

Upon consideration of the Notice of Non-Representation, filed January 9, 2024, it is

ORDERED that the Initial Brief and Appendix, filed April 1, 2024, are stricken for failure to contain a proper certificate of service. The striking is without prejudice to Appellant filing an Amended Initial Brief and Appendix, within **ten** days of the date hereof, that **contains a signed** certificate of service **reflecting** service of the Amended Initial Brief and Appendix on the Appellee, Iryna R. Abboud, the **address** to which it was sent and the **date** it was mailed.

*I hereby certify that the foregoing is  
(a true copy of) the original Court order.*

5D2023-3463 5/10/2024

SANDRA B. WILLIAMS, CLERK



cc:

Camille A. Abboud

Iryna R. Abboud

*[Handwritten signature]*  
6/6/24

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA  
FIFTH DISTRICT

Camille A. Abboud,

Appellant(s)

v.

Iryna R. Abboud,

Appellee(s).

Case No.: 5D2023-3463

L.T. No.: 2021-DR-1650

---

Date: May 29, 2024

**BY ORDER OF THE COURT:**

ORDERED that Appellant's Motion for an Extension of Time, filed May 14, 2024, is granted and the time for service of Appellant's Amended Initial Brief and Appendix is hereby extended to and including **June 17, 2024.**

*I hereby certify that the foregoing is  
(a true copy of) the original Court order.*

*Sandra B. Williams*  
5D2023-3463 5/29/2024  
SANDRA B. WILLIAMS, CLERK



cc:

Camille A. Abboud  
Iryna R. Abboud

*Camille A. Abboud*  
6/6/24

**IN THE DISTRICT COURT OF APPEAL  
FIFTH DISTRICT OF FLORIDA**

---

**CASE NO. 5D23-3463  
LT CASE NO. 2021-DR-1650**

---

**CAMILLE A ABBOUD**

**Appellant,**

**Vs.**

**IRYNA R. ABBOUD,**

**Appellee.**

---

**APPENDIX TO APPELLANT'S AMENDED INITIAL BRIEF**



Camille A. Abboud

Pro Se Appellant

100 Audubon Place

Suite 1420

Saint Johns, FL 32259

Telephone: 720.480.0090

Email: camilleabboud2013@gmail.com

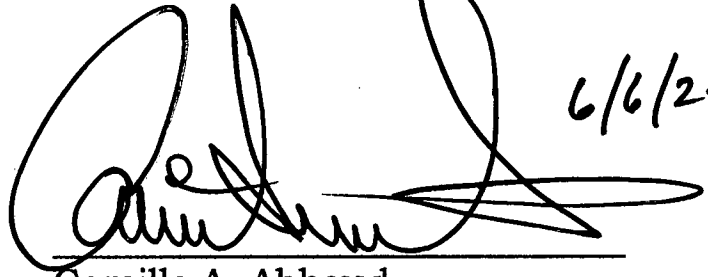
## **INDEX TO APPENDIX**

<b><u>Date Filed:</u></b>	<b><u>Name of Document:</u></b>	<b><u>Page Number:</u></b>
11/22/2023	Order Determining Respondent to Be Vexatious Litigant and Ordering Counsel <b>DR21-1650 – A-1 (DINs 200 &amp; 201)</b>	<b>5-17</b>
11/13/2023	Order On Amended Motion for Temporary Needs, Temporary Spousal Support, Temporary Child Support and Exclusive Use and Possession of Marital Home - <b>DR21-1650 – A-2 (DINs 174, 177, 227, 229, 232, 234 &amp; 257)</b>	<b>18-51</b>
03/22/2024	Order on Emergency Motion for Contempt and Enforcement and Request for Attorneys Fees and Order on Emergency Motion for Interim Attorneys Fees and Order of Case Management - <b>DR21-1650 – A-3 (DINs 201 &amp; 268)</b>	<b>52-60</b>
09/08/2021	Appellee's Petition for Temporary Injunction - <b>DR21-1577 – A-4</b>	<b>61-70</b>
11/07/2022	Appellee's Final Judgement of Injunction <b>DR21-1577 – A-5</b>	<b>71-82</b>
09/15/2021	Appellee's Petition for Dissolution Of Marriage with Minor Children <b>DR21-1650 – A-6 (DINs 18, 166, 168-170, 264 &amp; 267)</b>	<b>83-118</b>
06/16/2023	State of Florida vs. Abboud, Camille <b>23-1194MMA – A-7</b>	<b>119-128</b>
02/26/2024	Appellant's Amended Complaint <b>CA22-1450 – A-8 (DINs 69 &amp; 71)</b>	<b>129-135</b>



06/22/2023 Appellant's Civil & Criminal Complaint **136-148**  
- Flagler Hospital & Timothy Ward  
**CA23-1513 – A-9 (DINs 1, 29, 39, 43, 45 & 51)**

Respectfully Submitted June 6<sup>th</sup>, 2024.

A handwritten signature in black ink, appearing to read 'Camille A. Abboud', is written over a horizontal line. To the right of the signature, the date '6/6/24' is handwritten.

Camille A. Abboud  
Pro Se Appellant  
100 Audubon Place  
Suite 1420  
Saint Johns, FL 32259  
Telephone: 720.480.0090  
Email: [camilleabboud2013@gmail.com](mailto:camilleabboud2013@gmail.com).

**CERTIFICATE OF COMPLIANCE AND SERVICE**

**I, Camille A. Abboud, HEREBY CERTIFY** that this Amended Initial Brief complies with the Honorable Court's Order (5D23-3463) – Florida Rule of Appellate Procedure 9.210 & 9.220, as Ordered, AND a true and correct copy of the foregoing was served via E-mail this June 6<sup>th</sup>, 2024 on:

The Honorable Howard O. McGillin  
([hmcgillin@circuit7.org](mailto:hmcgillin@circuit7.org))

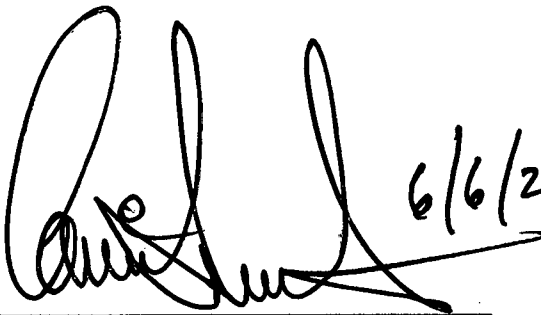
Regine Monestime Firm, Esq.  
The Monestime Firm, P.A.  
([themonestimefirm@gmail.com](mailto:themonestimefirm@gmail.com))

Derri Lassiter Young, Esq.  
([derri@lassiterlawyers.com](mailto:derri@lassiterlawyers.com))

Iryna R. Abboud  
([irynaabboud1@gmail.com](mailto:irynaabboud1@gmail.com))

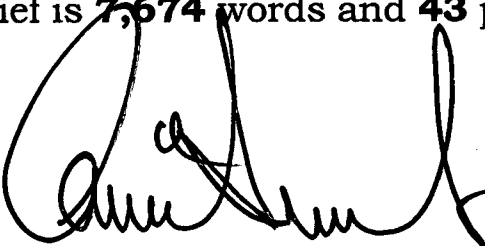
**AND BY CERTIFIED US MAIL TO:**

**Iryna R. Abboud  
46 Chandler Drive  
Saint Johns, Florida 32259**

By:  6/6/24  
Camille A. Abboud  
Pro Se Appellant

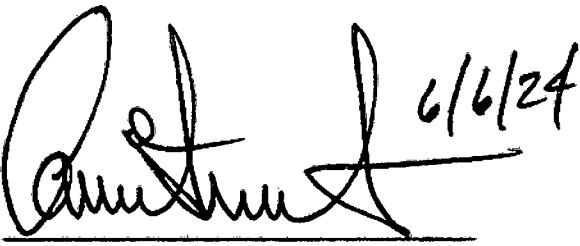
**CERTIFICATE OF COMPLIANCE - TYPE SIZE AND WORD COUNT**

In accordance with Florida Rule of Appellate Procedure 9.045(b) & (e), 9.200, 9.210 and 9.220, this Amended Initial Brief has been prepared using Bookman Old Style 14 point font and the Total Word Count for the Initial Brief is **7,674** words and **43** pages.

By:  6/6/24  
Camille A. Abboud  
Pro Se Appellant

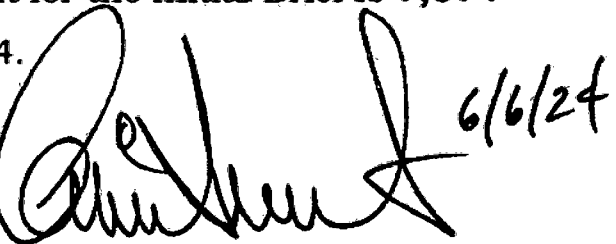
**CERTIFICATE OF COMPLIANCE AND SERVICE**

I, **Camille A. Abboud**, **HEREBY CERTIFY** that a signed, true and correct copy of the foregoing Amended Initial Brief (5D23-3463), as Ordered, has been furnished this 6<sup>th</sup> Day of June 2024, to Florida E-Filing Portal & the Appellee's attorneys derri@lassiterlawyers.com, (themonestimefirm@gmail.com), the Honorable Circuit Divorce & Trial Court Judge at (hmcgilllin@circuit7.org) AND to the Appellee's Email on file Irynaabboud1@gmail.com, AND BY CERTIFIED US MAIL to the Appellee's Marital Address: 46 Chandler Drive, Saint Johns, Florida 32259.

By:  6/6/24  
Camille A. Abboud  
Pro Se Appellant

**CERTIFICATE OF COMPLIANCE - TYPE SIZE AND WORD COUNT**

In accordance with Florida Rule of Appellate Procedure 9.045(b) & 9.045(e), 9.200, 9.210 and 9.220, this Amended Initial Brief & Appendix has been prepared using Bookman Old Style 14 point font and the Total Word Count for the Initial Brief is **7,674** words and **43** pages, June 6<sup>th</sup>, 2024.

By:  6/6/24  
Camille A. Abboud  
Pro Se Appellant



1W SAINT JOHNS  
112 BARTRAM OAKS WALK STE 104  
SAINT JOHNS, FL 32259-3268  
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Account #: XXXXXXXXXX1002

Approval #: 853171

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Saint Johns, FL 32259

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☐ Return Receipt (electronic)

☐ Certified Mail Restricted Delivery

☐ Adult Signature Required

☐ Adult Signature Restricted Delivery

Postage \$10.15

Total Postage and Fees \$14.55

Sent to IRYNA R. ABRUD

Street and City, No. or Box No. 26 CHANDLER DR.

City, State, ZIP+4® SAINT JOHNS, FL 32259

PS Form 3800, January 2013 PSN 7530-02-000-9017 See Reverse for Instructions

JUN - 6 2024

SAINT JOHNS STATION

*Carrie Ann*  
6/6/24

**IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA**  
**FIFTH DISTRICT**

**CAMILLE A. ABBOUD**

Appellant(s)

CASE NO. 5D23-3463

VS.

LT CASE NO. 2021-DR-1650

**IRYNA R. ABBOUD**

Appellee (s)

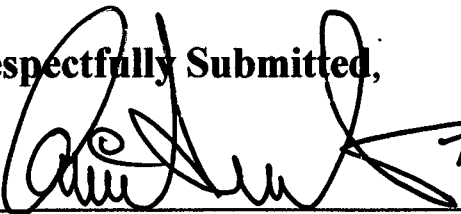
**NOTICE OF SERVICE**

NOTICE IS GIVEN that CAMILLE A. ABBOUD, Appellant, hereby, respectfully, submit to the Honorable 5<sup>th</sup> DCA, 5<sup>th</sup> District Court of Appeal, that the Appellant did indeed serve the Appellee, Iryna R. Abboud, the Amended Initial Brief & Associated Appendix (Filed June 6<sup>th</sup>, 2024), by Certified US Mail and Email to the addresses on file, for the Appellee, with the Lower Court as well as with the 5<sup>th</sup> District Court of Appeal (See attached).

The Appellant DID exactly what this Honorable Court asked him to do, serve the Appellee, Iryna R. Abboud, by US Mail and the Address to which it was sent and the date it was mailed. Please Note that the Appellee's did NOT accept the US Mail and the entire package was returned to the Appellant's address on July 5<sup>th</sup>, 2024 (See attached).

Instead, the Appellee did indeed call the St. Johns Sheriff to file "Felony Injunction Violation" – DR21-1577, "claiming" that the Appellant reached out in violation of said Injunction. In fact, the St. Johns Sheriff called the Appellant and "threatened" to file Felony Charges against the Appellant (See attached). These "threats" in direct violation of FS 825, were referred to the Florida Attorney General as well as the US Attorney.

Respectfully Submitted,



7/7/24

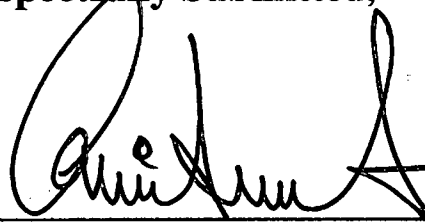
Name: CAMILLE A. ABBOUD

Address: 100 Audubon Place - Suite 1420  
Saint Johns, FL 32259  
720.480.0090

## **CERTIFICATE OF SERVICE**

I HEREBY CERIFY that a signed and true copy of the foregoing has been furnished this **7<sup>th</sup> Day of July 2024**, to Florida E-Filing Portal to the Appellee's - Attorneys on Record with the Florida 5<sup>th</sup> District of Appeal: **Derri Lassiter Young, Esq. at derri@lassiterlawyers.com, Regine Monsetime, Esq. at themonestimefirm@gmail.com.**

**Respectfully Submitted,**



7/7/24

Name: **CAMILLE A. ABBOUD**  
Address: **100 Audubon Place - Suite 1420**  
**Saint Johns, FL 32259**  
**camilleaboud2013@gmail.com**  
**720.480.0090**

THE CIRCUIT COURT OF THE  
SEVENTH JUDICIAL CIRCUIT IN AND  
FOR ST. JOHNS COUNTY, FLORIDA

CASE NO: DR-21-1577  
DR-21-1650  
DIVISION: 57

IRYNA ABOUD,  
Petitioner,

and

CAMILLE ABOUD,  
Respondent.

---

**NOTICE OF NEW PLACE OF EMPLOYMENT**

COMES NOW, the Petitioner, IRYNA ABOUD, by and through the undersigned counsel and files this Notice of New Place of Employment and states as follows:

1. A Final Judgment of Injunction for Protection Against Domestic Violence with Minor Children was entered by the Circuit Court on 11/08/2022 prohibiting the Respondent from going within 500 feet of the Petitioner's residence, place of employment and the school where the minor children attend.
2. The Petitioner IRYNA ABOUD'S new place of employment is Publix Supermarket Shoppes At Rivertown located at 205 Rivertown Shops Drive, Saint Johns, Florida 32259.

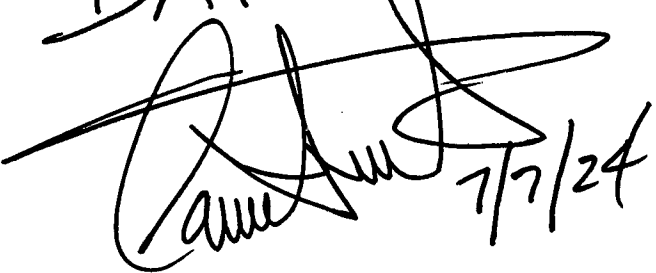
/s/ Derri Lassiter Young

---

Derri Lassiter Young, Esquire  
Florida Bar Number: 0596019  
6100 Greenland Road, Suite 403  
Jacksonville, Florida 32258  
Telephone 904-779-5585  
Fax 904-779-5252  
[Derri@lassiterlawyers.com](mailto:Derri@lassiterlawyers.com)  
Attorney for the Petitioner

NO

DATE

  
7/7/24

**Camille A Abboud**

---

**From:** "Dan Sorrells" <dsorrells@sjso.org>  
**Date:** Tuesday, February 22, 2022 4:04 PM  
**To:** <CAMILLEABBOUD2013@GMAIL.COM>  
**Subject:** Online Report

Mr. Abboud

Your online report: SJSO22WCR000167

Your report is being closed at this time because you know who the subject is in the online report which is your wife. In addition this appears to be a domestic civil matter and I recommend you contact a private attorney.

Thank You



**Dan Sorrells**  
Corporal | Law Enforcement  
ST. JOHNS COUNTY SHERIFF'S OFFICE | Robert A. Hardwick, Sheriff  
4015 Lewis Speedway, St. Augustine, Florida. 32084  
Office 904.295-3410

IDENTITY & MONETARY THEFT  
EXCEEDING \$265+K  
IS A DOMESTIC CIVIL  
MATTER!

*[Signature]* 7/11/24

7/11/2024



**ST. JOHNS COUNTY  
SHERIFF'S OFFICE**

**ROBERT A. HARDWICK, SHERIFF**

4015 Lewis Speedway, St. Augustine, FL 32084



**INFORMATION FORM**

*Civil*

If you have additional information that could assist in the investigation of the case listed below, please call the St. Johns County Sheriff's Office at (904) 824-8304.

Deputy Sheriff K. Makela

Case # SJS0230FF005442

Offense Vio. Inj. Date 5/21/23

**FOR SPECIFIC INQUIRIES:**

1. Evidence ..... (904) 209-1497
2. Investigations ..... (904) 209-1526
3. Narcotics ..... (904) 209-2435
- ④ 4. Records ..... (904) 810-6610
5. Victim Advocate ..... (904) 209-1577

**Please take a moment to complete the Sheriff's Survey.  
It can be found at [www.sjso.org](http://www.sjso.org) on the "About SJSO" page.**

**USE 911 FOR EMERGENCY CALLS ONLY**

REVISED 01/07/21

SJSO-312

**ST. JOHNS COUNTY  
SHERIFF'S OFFICE**

**ROBERT A. HARDWICK, SHERIFF**

4015 Lewis Speedway, St. Augustine, FL 32084



**INFORMATION FORM**

If you have additional information that could assist in the investigation of the case listed below, please call the St. Johns County Sheriff's Office at (904) 824-8304.

Deputy Sheriff \_\_\_\_\_

Case # SJS0240FF006146

Offense \_\_\_\_\_ Date 6/12/24

**FOR SPECIFIC INQUIRIES:**

1. Evidence ..... (904) 209-1497
2. Investigations ..... (904) 209-1526
3. Narcotics ..... (904) 209-2435
4. Records ..... (904) 810-6610
5. Victim Advocate ..... (904) 209-1577

**Please take a moment to complete the Sheriff's Survey.  
It can be found at [www.sjso.org](http://www.sjso.org) on the "About SJSO" page.**

**USE 911 FOR EMERGENCY CALLS ONLY**

REVISED 01/07/21

SJSO-312

**ST. JOHNS COUNTY  
SHERIFF'S OFFICE**

**ROBERT A. HARDWICK, SHERIFF**

4015 Lewis Speedway, St. Augustine, FL 32084



**INFORMATION FORM**

If you have additional information that could assist in the investigation of the case listed below, please call the St. Johns County Sheriff's Office at (904) 824-8304.

Deputy Sheriff \_\_\_\_\_

Case # 625024OFF006146

Offense \_\_\_\_\_ Date 6/12/24

**FOR SPECIFIC INQUIRIES:**

1. Evidence ..... (904) 209-1497
2. Investigations ..... (904) 209-1526
3. Narcotics ..... (904) 209-2435
4. Records ..... (904) 810-6610
5. Victim Advocate ..... (904) 209-1577

**Please take a moment to complete the Sheriff's Survey.  
It can be found at [www.sjso.org](http://www.sjso.org) on the "About SJSO" page.**

**USE 911 FOR EMERGENCY CALLS ONLY**

IN THE CIRCUIT COURT, SEVENTH  
JUDICIAL CIRCUIT, IN AND FOR ST. JOHNS  
COUNTY, FLORIDA

CASE NO.: DR21-1577  
DIVISION: 57

IRYNA ABBOUD(IDV) & ANDREW,  
GEORGE, & MICHAEL ABBOUD (MINORS)

PETITIONER

AND

CAMILLE ABBOUD

RESPONDENT

---

**ORDER ON MULTIPLE MOTIONS AND FILINGS**

THIS CAUSE has come before the Court upon multiple motions and petitions by both parties. See DIN 209, DIN 213, 215, 216, 217. The Court being fully advised in the premises, finds as follows:

The Respondent in this Injunction case has raised several issues in so-called "emergency" filings. The Court already determined that one of those motions did not raise an emergency concern. (See DIN 211). These issues raised in all of the motions are related to timesharing and child support. The Final Injunction in this matter only ordered supervised visitation. Since that order, this Court has issued multiple rulings in the companion case DR 21-1650 relating to child support and other matters.

Fla. Fam. L. R. P. 12.003 Coordination of Related Family Cases and Hearings gives the trial court the ability to "coordinate the progress of the remaining issues to facilitate the resolution of the pending actions and to avoid inconsistent rulings." Fla. Fam. L. R. P. 12.003(2)(B).

The issues raised by the Respondent in his most recent pleadings all relate to his timesharing and child support. Those issues are now properly the subject of the upcoming trial in DR 21-1650. Moreover, there was no support ordered within this injunction case. The Court finds that to avoid unnecessary duplication of effort and possible inconsistent rulings, as well as to manage the scarce time of the Court all matters other than the no-contact provisions of the Injunction, are properly the subject of the dissolution case in DR 21-1650 and should be litigated there. To be clear, this is not intended to deny access to the Court to any party. The Motions dismissed here, administratively, may be refiled in the companion case by the appropriate party.

It is ORDERED AND ADJUDGED:

1. The Respondent's Motions at DIN 209 (Motion for Emergency Hearing), DIN 216 (Response to Motion for Dismissal of Emergency Hearing) and DIN 217 (Petition – Motion for Emergency Order) are all dismissed within this case without prejudice. The Respondent may refile them within the companion case DR 21-1650 if his counsel chooses to adopt them.
2. The Petitioner's Motion to Dismiss Respondent's Petition – Motion for Emergency Hearing and Motion to Deem the Respondent as a Vexatious Litigant is dismissed as moot.
3. A copy of this Order shall also be filed in DR 21-1650.

DONE AND ORDERED in chambers, in St. Johns County, Florida, on 01 day of August, 2024.

8/1/2024 4:53 PM DR21-1577  


e-Signed 8/1/2024 4:53 PM DR21-1577  
HOWARD O MCGILLIN JR  
CIRCUIT JUDGE

CF:

The Clerk of Court shall serve this Order upon the following parties or their attorneys of record at their mailing address or via email in accordance with Fla. R. Gen. Prac. & Jud. Admin. 2.516(b)

Petitioner Attorney

ABBOUD, CAMILLE

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA  
FIFTH DISTRICT

Camille A. Abboud,

CASE NO.: 5D2023-3463

LT CASE NO. 2021-DR-1650

Appellant(s),

v.

Iryna R. Abboud,

Appellee(s).

\_\_\_\_\_/

DATE: August 2, 2024

**BY ORDER OF THE COURT:**

**NOTICE OF PANEL ASSIGNMENT**

This is to advise you that this cause has been assigned to the following panel of judges, listed in their order of seniority:

HONORABLE ERIC J. EISNAUGLE

HONORABLE JOHN M. HARRIS

HONORABLE PAIGE KILBANE

Please be advised that the panel composition is subject to change at any time and without further notice.

*I hereby certify that the foregoing is  
(a true copy of) the original Court order.*

5D2023-3463 8/2/2024

*Sandra B. Williams*  
SANDRA B. WILLIAMS, CLERK



cc:

Camille A. Abboud

Iryna R. Abboud

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA  
FIFTH DISTRICT

Camille A. Abboud,

Case No.: 5D2023-3463

L.T. No.: 2021-DR-1650

Appellant(s),

v.

Iryna R. Abboud,

Appellee(s).

---

Date: August 2, 2024

**BY ORDER OF THE COURT:**

ORDERED that Appellant's "Motion for Oral Argument in Support of Appellant's Amended Initial Brief," filed July 15, 2024, is denied.

*I hereby certify that the foregoing is  
(a true copy of) the original Court order.*

5D2023-3463 8/2/2024

*Sandra B. Williams*  
SANDRA B. WILLIAMS, CLERK



Panel: Judges Eisnaugle, Harris and Kilbane

cc:

Camille A. Abboud

Iryna R. Abboud

**IN THE DISTRICT COURT OF APPEAL OF THE STATE OF  
FLORIDA FIFTH DISTRICT**

**Camille A. ABBOUD**,  
Appellant(s)

**CASES NO. 5D23-3463**

**VS. LT CASES NO. 2021-DR-1650**

**IRYNA R. ABBOUD**,  
Appellee(s)

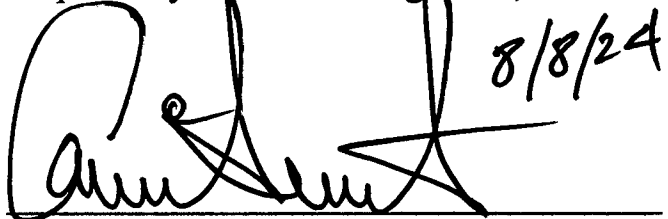
**NOTICE TO INVOKE DISCRETIONARY AND MANDATORY JURISDICTION OF THE FLORIDA SUPREME COURT**

NOTICE IS GIVEN that CAMILLE A. ABBOD, Appellant, hereby, respectfully, in accordance with Florida Constitution Article V, Section 3, Florida Appellate Rule 9.900 (d), Florida Appellate Rule 9.020 (d) & (i), AND Fla. R. App. P. 9.120 (c), invokes the Discretionary AND Mandatory Jurisdiction of the Florida Supreme Court to review the Order as it relates to the Florida 7<sup>th</sup> Judicial Circuit Orders (Case: DR21-1650) and ALL associated Orders by the Honorable **5<sup>th</sup> DCA, 5<sup>th</sup> District Court of Appeal**, as they constitute flagrant and intentional violations of the Appellant's RIGHTS under Florida Statutes (FS 741, 775, 784 & 825), the Florida Constitution (Article IV, Section 7(a)) AND the US Constitution (1<sup>st</sup>, 2<sup>nd</sup>, 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 7<sup>th</sup>, 8<sup>th</sup>, 9<sup>th</sup>, 14<sup>th</sup> Amendments), expressly construes many provisions of the State of Florida and the United States Constitutions, explicitly affects a class of Constitutional and Elected State Officers, directly conflicts with many decisions of another District Court of Appeal OR the Florida Supreme Court AND passes on a question CERTIFIED to be of great importance certified to be of great public importance, and directly violates FL House Bill - HB 775, Parenting & Fathers' Rights as enacted on July 1<sup>st</sup>, 2023.

*Included, with this Notice, the Original Order by the Honorable 7<sup>th</sup> Judicial Circuit Order (ORDER DETERMINING RESPONDENT TO BE A VEXATIOUS LITIGANT AND ORDERING COUNSEL) AND the Honorable 5<sup>th</sup> DCA Further ORDER that Appellant's "Request for Oral Argument in Support of Appellant's*

*Brief,” filed July 15<sup>th</sup>, 2024 is **DENIED**. The ENTIRE ORIGINAL ORDER is a Flagrant Violation of the Florida Constitution and thus The Honorable 5<sup>th</sup> District Court of Appeal (5DCA) DENYING the Appellant’s Request for Oral Argument constitutes continuous VIOLATIONS of the Appellant’s Florida & U.S. Constitutional & Civil Rights.*

Respectfully Submitted August 8<sup>th</sup>, 2024.

A handwritten signature in black ink, appearing to read 'Camille A. Abboud', with a date '8/8/24' written to the right.

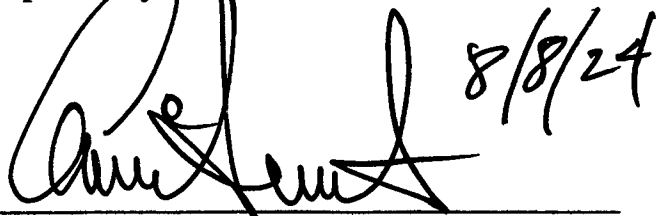
Name: CAMILLE A. ABBOD  
Address: 100 Audubon Place- Suite 1420  
Saint Johns, FL 32259  
720.480.0090  
Email: Camilleabboud2013@gmail.com

### **CERTIFICATE OF SERVICE**

I HEREBY CERIFY that a signed and true copy of the foregoing has been furnished this 8<sup>th</sup> Day of August 2024, with the Clerk of the Court by using the Florida E-Filing Portal and to the Appellee’s Attorneys on Record with the Florida 5<sup>th</sup> District of Appeal and by Emails to: **Circuit Presiding Judge McGillin at ([hmcgillin@circuit7.org](mailto:hmcgillin@circuit7.org)), Derri Lassiter Young, Esq. at [derri@lassiterlawyers.com](mailto:derri@lassiterlawyers.com), Regine Monsetime, Esq. at [themonestimefirm@gmail.com](mailto:themonestimefirm@gmail.com).**

**The Appellant did NOT serve the Appellee’s Personal Email as it “might” constitute a Violation of the Injunction (DR21-1577), as the Appellee DID NOT enter an appearance with the Florida 5<sup>th</sup> District OR the St. Johns County Court as a Pro Se Litigant.**

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Camille A. Abboud', with a date '8/8/24' written to the right.

Name: CAMILLE A. ABBOD  
Address: 100 Audubon Place - Suite 1420  
Saint Johns, FL 32259  
[camilleabboud2013@gmail.com](mailto:camilleabboud2013@gmail.com)  
720.480.0090



IN THE CIRCUIT COURT, SEVENTH  
JUDICIAL CIRCUIT, IN AND FOR ST. JOHNS  
COUNTY, FLORIDA

CASE NO.: DR21-1650  
DIVISION: 57

IRYNA ABOUD  
PETITIONER  
AND  
CAMILLE ABOUD  
RESPONDENT

---

**ORDER DETERMINING RESPONDENT TO BE A VEXATIOUS LITIGANT AND  
ORDERING COUNSEL**

This matter comes before the court at a pretrial conference set by previous order. The respondent in this case, Camille Abboud, has been representing himself for several months in this litigation. Trial in this case was set for December 21, 2023. See DIN 127.

Counsel for the petitioner Dori Lassiter Young, reported to the court that she was unable to meet with the respondent as required by the court's pretrial order. They were also unable to agree on any element of a joint pretrial stipulation. Consequently, both filed a unilateral pretrial statement.

The respondent filed a lengthy and somewhat rambling pretrial statement. The court reviewed his pretrial statement and sought to determine if a trial would be possible given the scope of the pretrial statement. Among other items, the respondent insists that at the trial, scheduled for one day, he will call witnesses from a list of 47 entries. Many of those entries list multiple names. Some list only initials while others list only a vague description of the witness. (See DIN 192)

In particular, he stated an intent to call three Circuit judges and two County judges as witnesses. He claimed that most of them would provide testimony regarding a Domestic Violence Injunction entered in collateral case DR 21-1577. That case was tried on November 2, 2022, and resulted in a Final Injunction being issued on November 7, 2022 (See DIN 143 in DR 21-1577) During the pendency of that case, he was represented by three different attorneys *in seriatim*. The last counsel withdrew shortly after the final judgment. Shortly after that withdrawal, the Respondent began a series of *pro se* filings directed toward the final judgment. These included a so-called Emergency motion alleging misconduct by the Petitioner's attorney including perjury. (See DIN 160, 164, DR 21-1577) The undersigned, who assumed

responsibility for this Division on January 1, 2023, denied emergency treatment and directed the parties' set the matter for hearing. The Respondent followed up with another "Emergency" motion (DIN 175, DR 21-1577) to reopen the case. That was also denied emergency treatment (DIN 177, DR 21-1577). The Respondent filed yet another motion to reopen (DIN 180, DR 21-1577) having yet failed to set any of his motions for hearing. The Court set that for hearing and noticed the hearing for October 18, 2023.

The substance of his motions, none of which were timely under the Family Rules, was that the predecessor judge's order failed to record accurately her oral pronouncement. The undersigned reviewed the audio recording of that hearing and issued an order on October 18, 2023, denying the motion, finding that the Order issued by the predecessor judge accurately reflected the oral pronouncement.

Two of the judges Respondent suggested as witnesses were genuinely involved in those proceedings. The Respondent sought to subpoena them to appear at the trial on the merits of the dissolution case to explain their actions. He asserts that their testimony would somehow be relevant to his dissolution. It was evident that he merely wished to relitigate the domestic violence case within the dissolution.

The other three judges were involved in several other cases which are tangentially related. One judge conducted first appearance on the Respondent after he was arrested in a criminal case. Another presides over a small claims civil case against a local homebuilder, while the third presides over a felony case in which a petition to expunge was denied. There is no possible justification to call any of them as witnesses. As an aside, the Court is aware that the Respondent has sued at least two of those judges in federal court. That case is pending. The undersigned has avoided all contact with that case and is only aware of the existence of the suit.

He also seeks to subpoena US District Court Judge Timothy Corrigan. He asserts that Judge Corrigan will present relevant testimony in the dissolution case. He was unable to articulate any theory of relevance. The Court informed him that the likely result of such a subpoena would be a removal of the subpoena to federal court and a quashing of the subpoena.

The Respondent also announced firm plans to subpoena the current elected State Attorney, RJ Larizza, and several assistant State's Attorneys to "explain" why he was arrested for the various criminal charges, including a pending and active misdemeanor charge of violating the Domestic Violence injunction. He plans to call the elected Sheriff of St Johns County to explain why he was arrested in those criminal cases, and how he was injured at the hands of

Sheriff's Deputies. He plans to call the Attorney General of the State of Florida as a witness for an unknown reason. All of these are detailed in his pretrial statement at DIN 192.

He also seeks to subpoena the mediator in the case, various doctors from Flagler hospital, an unnamed expert on the US Constitution, and all of his former attorneys.

In that same statement, the Respondent asserts he has filed document requests with "St. Johns County Court, the FL State Attorney, the St. Johns Sheriff Office, the St. Johns Jail, Flagler Hospital, FL AG, FDLE, DCF, Betty Griffin, as well as the Federal Middle District Court, the US Justice Department, FBI, IRS, SS, INS, Homeland Security, and the Lebanese Embassy in Washington D.C. as well as the Lebanese Interior and Foreign Ministries" for various documents he claim are relevant to this matter. He claims that he will provide those to counsel before trial. He states he intends to introduce mail, texts and the "dark web."

This pleading is but the last in a long line of *pro se* pleadings. None of these pleadings were filed when he was represented by counsel.

The Respondent's first attorney of record was Mr. Michael Hines who represented the Respondent from September 28, 2021 (DIN 14) through October 28, 2021 (DIN 31) when attorney Laura Wright filed her notice of appearance. Mr. Hines was relieved formally on November 1, 2021 (DIN 34) based on Mr. Hines' motion citing conflict with his client (DIN 32). Ms. Wright continued until March 15, 2022, when attorney Chirstine Leonard entered an appearance (DIN 66). Ms. Wright was formally relieved the same date on a consent order (DIN 68). Mr. Tyson filed a notice of appearance on August 19, 2022. (DIN 87). Ms. Leonard was formally relieved on August 23, 2023 (DIN 88). Respondent has represented himself since February 24, 2023, when attorney Joshua Tyson withdrew as counsel of record citing irreconcilable differences. (DIN 112, 114 and 116).

A review of the docket suggests the case proceeded in a largely typical fashion during all periods in which the Respondent was represented by counsel. The parties scheduled mediation several times. On December 21, 2022, the mediator, Joy Lordahl, filed a notice that the matter had not been settled. On April 3, 2023, the Court set the matter for trial.

Respondent began to file *pro se* motions in this case on May 18, 2023, largely directed towards the Court's order in the Domestic Violence matter. (DIN 129). Similar to the filings in the Domestic Violence case, this motion was styled an "emergency" motion. The motion cited many of the same bases as the filings in the Domestic Violence case including an erroneous recordation of the court's oral pronouncement into the written order, as well as myriad violations of state and federal law. The motion claimed the Respondent has expended over \$100,000.00

in attorney's fees on 8 attorneys. The Court declined to give the motion emergency treatment. (DIN 131).

On June 14, 2023, the Respondent filed a motion withdrawing his previous motion for social investigation and cancelling the hearing previously set for June 15, 2023. (DIN 136). On July 26, 2023, he again filed a motion for social investigation and included a request for temporary relief. (DIN 141) That motion is filled with exaggeration and invective. It overtly and subtly accuses individuals and groups in the judicial system, private industry and health care fields of practicing bigotry and racism towards the Respondent. It likens the treatment of his children to the 19<sup>th</sup> century and the Soviet era. The vast majority of the 22-page pleading is virtually impossible to follow in a logical fashion as it moves in what can only be described as a stream of consciousness fashion from topic to topic. In just one paragraph (by example) on pages 15-16 (paragraph numbered 30), he conflates issues in his small claims case with the home builder with alleged abuse during his chemotherapy with his petition to expunge his criminal record and defend against threats to his security clearance.

Notably, Petitioner's attorney moved to dismiss this motion (DIN 145) citing, *inter alia*, multiple threats to her, other attorneys, judges, judicial assistants, and other personnel. Undeterred, the Respondent filed a responsive pleading accusing Petitioner's attorney of perjury, identity theft, monetary theft, immigration, Medicare, and treasury fraud as well as violations of the Atomic Energy Act. (DIN 147).

The Court proceeded to a temporary needs hearing on August 14, 2023. A significant portion of both the testimony of the Respondent as well as his questioning of the Petitioner was an attempt to relitigate the Domestic Violence case, his pending civil cases in state and federal court and his pending and closed criminal matters. The Court had to frequently redirect his inquiry to the temporary financial needs that were noticed for hearing. The Court issued its order on temporary needs on November 13, 2023 (served on November 14, 2023, DIN 172). Later the same day, the Petitioner moved to disqualify the undersigned. (DIN175) That motion was denied as legally insufficient. (DIN 188).

The Respondent also filed a Motion to Rehear, including, *inter alia*, a patently false claim that "[t]his Court, after watching, just the last few minutes of Judge Anthony's Hearing recording on November 2nd, 2022 (DR21-1577) 'decided' and so 'ordered' just like others before, that the Respondent/Father is just a 'Ranting, Perfidious, Deceiving and Dishonest Arab.'" It is unclear from the context if the Respondent was referring to the undersigned or another person. To the extent it refers to the undersigned, it is categorically false. However, as the Respondent also

filed a Notice of Appeal directed to that order, no rehearing has been held as the Court is divested of jurisdiction to rule on the Motion for Rehearing.

At the pretrial hearing on November 22, 2023, attorney Young submitted an email from the Respondent to her, in which he communicated what could be construed as a veiled threat to her, Judge Anthony, "Department of Children and Families and Betty Griffin cohorts." See Evidence log at DIN 198 – email). Attorney Young asserts this is a common occurrence when attempting to deal with the Respondent acting as his own attorney. This email, among other concerns, precluded the joint pretrial meeting and review of evidence required in the Court's pretrial order. The Court notes, in this regard, that Attorney Young is herself a direct litigation target of the Respondent. He has, *pro se*, filed a civil suit, also pending before the undersigned, in case CA 22-1450 alleging Assault – Deliberate Infliction of Extreme Physical & Emotional Distress, Gross Negligence – Emotional & Physical of a Disabled Elderly Spouse, and Monetary & Identity Theft – Perjury & Legal Malpractice. That case is pending a Motion to Dismiss.

It is clear, after a review of the history in this Domestic Relations case, that this matter will be unable to be tried unless this respondent is represented by a member of the Florida bar. While the Respondent is competent to represent himself, his behavior before the court and in his pleadings demonstrates an inability to address the issues in the case concisely or appropriately. The witness and evidence list filed as part of the pretrial statement are non-serious and designed only to delay, harass, and obfuscate. The repeated motions conflating the multiple pending matters, both in this and federal court, do nothing but clog the machinery of justice.

The Court is intimately familiar with *pro se* litigants. They are a fixture of family law. The conduct of this Respondent is at an entirely different level, and at this stage, patently unmanageable level. As noted above, his pleadings have included outright falsehoods. His actions make a mockery of the justice system. Therefore, the court reluctantly concludes that it must declare this respondent a vexatious litigant and order him to hire an attorney licensed by the Florida bar to file all further pleadings and to represent him in this case. The Court is intimately familiar with the Respondent's finances. While he has been unemployed at various times, it is patent he can afford high quality representation. Indeed, he has retained several highly experienced and skilled family law practitioners in this case.

The Court does not take this order lightly. Unlike civil cases, there is no statute governing vexatious litigation in the Family Law context. Finding a party to be vexatious appears to be governed solely by the general authority of the Court to govern its own docket. A Court has the obligation to move cases along as swiftly as is just. Where courts have previously ruled in

vexatious litigation in family law matters, it appears that reasonable restrictions will be upheld so long as those restrictions do not amount to a total denial of access. See *Young v. Hector*, 884 So. 2d 1025, 1028 (Fla. 3rd Dist. Ct. App. 2004) (“[E]specially in the area of family law, great care should be taken to reduce emotional strife and to avoid vexatious and needless litigation.”); *Neunzig v. Neunzig*, 766 So. 2d 441, 442 (Fla. 4th Dist. Ct. App. 2000) (finding that barring a former husband from defending himself *pro se* in an action initiated by the former wife to be too broad a sanction); *Sibley v. Sibley*, 885 So.2d 980, 981 (Fla. 3rd Dist. App. 2004) (barring former husband in dissolution case from representing himself).

One of the primary complaints the Petitioner has, albeit in an inartful manner, expressed in a multitude of pleadings, is the long time this case has taken to move to resolution. The Respondent articulates that he has not seen his children for more than about 40 hours in over 400 days. The Court understands this frustration. Yet, his own actions are causing the delay. His repeated frivolous filings, his unfocused and irrelevant presentation of evidence, and his conflation of the multiple cases he has chosen to participate in, or which were predicated by his actions, lead him here. As the Court informed the Respondent in court, he is, at present, his own worst enemy.

Ordering a party to cease filing pleadings would be an infringement of fundamental rights were there no other option to place pleadings before the court. However, he has discharged 5 qualified family law practitioners as this case progressed. The very engagement of those attorneys indicates strongly that the Petitioner has the financial ability to hire counsel. Moreover, according to his own testimony at the temporary needs hearings and his financial affidavit, he has substantial assets from which to fund an attorney.

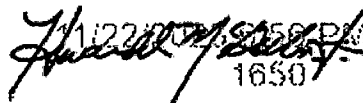
The Court also considered other sanctions including assessment of attorneys’ fees and striking of pleadings. The Court cannot see how an assessment of fees would assist in advancing this case. It remains a potential sanction, however.

This is not a complex case. While there are significant issues ranging from parenting to support and equitable distribution, there is nothing extraordinary raised by the pleadings. Indeed, while represented by counsel the case appeared to be on a stable trajectory towards a trial. That all ended when the Respondent started to represent himself. The Court concludes that by his actions, he stands blocking the door to justice. He holds the key to unlock that door. This Court can see no other remedy than to preclude him from further *pro se* pleadings and require him to be represented by a member of the bar.

It is ORDERED AND ADJUDGED:

1. The respondent, Camille Abboud, is hereby declared a vexatious litigant in this matter only. This order does not apply to any other case pending before the undersigned.
2. The Respondent is hereby barred from filing any documents in the court file until and unless he is represented by an attorney, and those documents are filed by such attorney on his behalf. The sole exception is that he may file an appropriate Motion for Reconsideration or Rehearing or Notice of Appeal directed towards this order alone. The Clerk is directed to reject any other filing.
3. The trial in this case is hereby cancelled.
4. Case management is set for January 17, 2023, at 11:00 AM. The respondent must appear with counsel at that time period. The trial will be reset on an expedited basis at that hearing.

DONE AND ORDERED in chambers, in St. Johns County, Florida, on 22 day of November, 2023.

 11/22/2023 6:56 PM DR21-1650

e-Signed 11/22/2023 6:56 PM DR21-1650  
HOWARD O MCGILLIN JR  
CIRCUIT JUDGE

CF:

The Clerk of Court shall serve this Order upon the following parties or their attorneys of record at their mailing address or via email in accordance with Fla. R. Gen. Prac. & Jud. Admin. 2.516(b)

Petitioner Attorney

Camille Abboud, pro se

# Supreme Court of Florida

TUESDAY, JANUARY 30, 2024

Camille Abboud,  
Petitioner(s)

v.

Iryna R. Abboud,  
Respondent(s)

**SC2024-0142**

Lower Tribunal No(s).:  
5D2023-3455;

552021DR001577A000XX,  
552021DR001650A000XX,  
552022CA001450A000XX

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Petitioner's Notice to Invoke Discretionary Jurisdiction, seeking review of the order or opinion issued by the Fifth District Court of Appeal on January 5, 2024, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. See *Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846 So. 2d 1141 (Fla. 2003); *Stallworth v. Moore*, 827 So. 2d 974 (Fla. 2002); *Harrison v. Hyster Co.*, 515 So. 2d 1279 (Fla. 1987); *Dodi Publ'g Co. v. Editorial Am. S.A.*, 385 So. 2d 1369 (Fla. 1980); *Jenkins v. State*, 385 So. 2d 1356 (Fla. 1980).

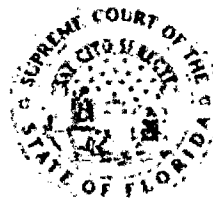
No motion for rehearing or reinstatement will be entertained by the Court.

A True Copy

Test:

SC2024-0142 1/30/2024

John A. Tomasino  
Clerk, Supreme Court





# Supreme Court of Florida

TUESDAY, JANUARY 30, 2024

Camille Abboud,  
Petitioner(s)

v.

Iryna R. Abboud,  
Respondent(s)

**SC2024-0143**

Lower Tribunal No(s).:

5D2023-3383;

552021DR001650A000XX

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Petitioner's Notice to Invoke Discretionary Jurisdiction, seeking review of the order or opinion issued by the Fifth District Court of Appeal on December 5, 2023, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. See *Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846 So. 2d 1141 (Fla. 2003); *Stallworth v. Moore*, 827 So. 2d 974 (Fla. 2002); *Harrison v. Hyster Co.*, 515 So. 2d 1279 (Fla. 1987); *Dodi Publ'g Co. v. Editorial Am. S.A.*, 385 So. 2d 1369 (Fla. 1980); *Jenkins v. State*, 385 So. 2d 1356 (Fla. 1980).

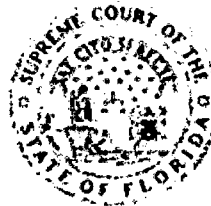
No motion for rehearing or reinstatement will be entertained by the Court.

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Test:

SC2024-0143 1/30/2024

John A. Tomasino  
Clerk, Supreme Court



# Supreme Court of Florida

TUESDAY, JANUARY 30, 2024

Camille Abboud,  
Petitioner(s)

v.

Iryna R. Abboud,  
Respondent(s)

**SC2024-0144**

Lower Tribunal No(s):

5D2023-3482;

552022CA001450A000XX

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Petitioner's Notice to Invoke Discretionary Jurisdiction, seeking review of the order or opinion issued by the Fifth District Court of Appeal on December 6, 2023, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. See *Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846 So. 2d 1141 (Fla. 2003); *Stallworth v. Moore*, 827 So. 2d 974 (Fla. 2002); *Harrison v. Hyster Co.*, 515 So. 2d 1279 (Fla. 1987); *Dodi Publ'g Co. v. Editorial Am. S.A.*, 385 So. 2d 1369 (Fla. 1980); *Jenkins v. State*, 385 So. 2d 1356 (Fla. 1980).

No motion for rehearing or reinstatement will be entertained by the Court.

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Test:

SC2024-0144 1/30/2024

John A. Tomasino

Clerk, Supreme Court



# Supreme Court of Florida

MONDAY, APRIL 29, 2024

Camille Abboud,  
Petitioner(s)

v.

Iryna R. Abboud,  
Respondent(s)

**SC2024-0623**

Lower Tribunal No(s):

5D2023-3383;

552021DR001650A000XX

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Petitioner's Notice to Invoke Discretionary Jurisdiction, seeking review of the order or opinion issued by the Fifth District Court of Appeal on April 19, 2024, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. *See Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846 So. 2d 1141 (Fla. 2003); *Stallworth v. Moore*, 827 So. 2d 974 (Fla. 2002); *Harrison v. Hyster Co.*, 515 So. 2d 1279 (Fla. 1987); *Dodi Publ'g Co. v. Editorial Am. S.A.*, 385 So. 2d 1369 (Fla. 1980); *Jenkins v. State*, 385 So. 2d 1356 (Fla. 1980).

No motion for rehearing or reinstatement will be entertained by the Court.

A True Copy  
Test:

SC2024-0623 4/29/2024

John A. Tomasino  
Clerk, Supreme Court



# Supreme Court of Florida

TUESDAY, AUGUST 20, 2024

Camille Abboud,  
Petitioner(s)

v.

Iryna R. Abboud,  
Respondent(s)

**SC2024-1213**

Lower Tribunal No(s).:

5D2023-3463;

552021DR001650A000XX

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Petitioner's Notice to Invoke Discretionary Jurisdiction, seeking review of the order or opinion issued by the 5th District Court of Appeal on August 2, 2024, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. See *Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846 So. 2d 1141 (Fla. 2003); *Stallworth v. Moore*, 827 So. 2d 974 (Fla. 2002); *Harrison v. Hyster Co.*, 515 So. 2d 1279 (Fla. 1987); *Dodi Publ'g Co. v. Editorial Am. S.A.*, 385 So. 2d 1369 (Fla. 1980); *Jenkins v. State*, 385 So. 2d 1356 (Fla. 1980).

No motion for rehearing or reinstatement will be entertained by the Court.

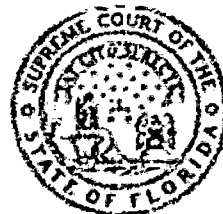
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SC2024-1213 8/20/2024

John A. Tomasino

Clerk, Supreme Court



IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA  
FIFTH DISTRICT

Camille A. Abboud,

Case No.: 5D2024-0799

L.T. No.: 2021-DR-1650

Appellant(s),

v.

Iryna R. Abboud,

Appellee(s).

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Date: September 11, 2024

**BY ORDER OF THE COURT:**

ORDERED that the Notice of Non-Representation, filed September 5, 2024, is acknowledged.

Upon consideration of the injunction, it is further

ORDERED that this Court shall provide a copy of the Initial Brief, filed July 30, 2024, to Appellee. Appellee shall have **thirty** days from the date hereof to serve an Answer Brief.

*I hereby certify that the foregoing is  
(a true copy of) the original Court order.*

5D2024-0799 9/11/2024  
*Sandra B. Williams*  
SANDRA B. WILLIAMS, CLERK



cc:

Camille A. Abboud  
Iryna R. Abboud  
Derri Lassiter Young

IN THE DISTRICT COURT OF APPEAL  
FIFTH DISTRICT OF FLORIDA

CASE NO: 5D24-0799  
L/T CASE NO: 2021-DR-1650

IN RE:  
CAMILLE ABBOUD,  
Appellant,

vs.

IRYNA R. ABBOUD,  
Appellee.

---

**NOTICE OF NON-REPRESENTATION**

The Lassiter Law Firm and Derri Lassiter Young, Esquire hereby enters this Notice of Non-Representation in the above referenced case. All pleadings should be served upon IRYNA R. ABBOUD at the following address and email address:  
  
46 Chandler Drive, St. Johns Florida 32259  
  
Irynaabboud1@gmail.com.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this pleading has been furnished on this 5th day of September, 2024 to IRYNA ABBOUD at [irynaabboud1@gmail.com](mailto:irynaabboud1@gmail.com) and CAMILLE ABBOUD at [camilleabboud2013@gmail.com](mailto:camilleabboud2013@gmail.com).

*/s/ Derri Lassiter Young*  
DERRI LASSITER YOUNG, ESQ.  
The Lassiter Law Firm, P.A.  
6100 Greenland Road, Suite 403  
Jacksonville, Florida 32258  
(904) 779-5585 phone  
(904) 779-5252 fax  
[Derri@lassiterlawyers.com](mailto:Derri@lassiterlawyers.com)  
Florida Bar No.: 0596019

**Additional material  
from this filing is  
available in the  
Clerk's Office.**