

26 - 5454 ORIGINAL
No. _____

SUPREME COURT OF THE UNITED STATES

Jo-Anne Sparta,

Petitioner, *Pro Se*

vs.

Related Affordable, LLC, TRG Management Company LLP,

SA Residences Preservation, L.P.,

Respondents.

On A Petition For A Writ Of Certiorari

To The Florida State Supreme Court

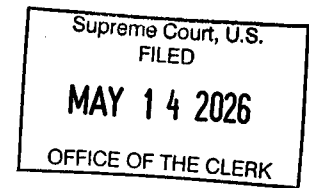
PETITION FOR A WRIT OF CERTIORARI

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I. Questions Presented

1. Where Respondents blatantly and consistently violate civil, criminal, moral, ethical and legally accepted precepts, corroborated by copious evidentiary proof, was the Florida Supreme Court remiss in refusing to review this case, forgoing the application of applicable laws that are there to hold Respondents accountable and protect citizenry?
2. Was the refusal of the courts to acknowledge the Respondents' proven pattern of conduct, committing fraud, coercion, retaliation, bribery, and perjury, in direct conflict with the evidence submitted, and the growing number of cases nationwide of Respondents lying under oath to obtain legal actions through illegal means, without ever having to provide actual proof of their allegations?

II. Parties To The Proceeding

All parties are listed in the caption. Petitioner *Pro Se* is: Jo-Anne Sparta.

Respondents are: Related Affordable, LLC, TRG Management Company LLP,
and SA Residences Preservation, L.P.

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IV. Table of Authorities

Constitutional Provisions, Statutes, and Rules, Florida Constitution (1968 Revision)

Art. I, § 21

“Access to courts. The courts shall be open to every person for redress of any injury, and justice shall be administered without sale, denial or delay.”

Art. V, § 4.

“(1) District courts of appeal shall have jurisdiction to hear appeals, that may be taken as a matter of right, from final judgments or orders of trial courts, including those entered on review of administrative action, not directly appealable to the supreme court or a circuit court.”

Florida Rules of Appellate Procedure (Oct. 1, 2017)

§ 9.110 ” Appeal Proceedings To

Review Final Orders Of Lower Tribunals and Orders Granting New Trial In Jury and Nonjury Cases”.

§ 9.210 Briefs-Formatting

§ 1.530.....” Motions For New Trial and Rehearing;

Amendments of Judgments, Remittitur or Additur (a) Jury and Non-Jury Actions. A new trial may be granted to all or any of the parties and on all or a part of the issues.

Florida Statutes:

§ 90.609 : Character of witness as impeachment. A party may attack or support the credibility of a witness, including an accused, by evidence in the form of reputation, except that:

(1) The evidence may refer only to character relating to truthfulness.(2) Evidence of a truthful character is admissible only after the character of the witness for truthfulness has been attacked by reputation evidence.

§ 837.02: Perjury in official proceedings: (1) Except as provided in subsection (2), whoever makes a false statement, which he or she does not believe to be true, under oath in an official proceeding in regard to any material matter, commits a felony of the third degree.

§ 90.104: "Rulings on evidence (1) A court may predicate error, set aside or reverse a judgment, or grant a new trial on the basis of admitted or excluded evidence when a substantial right of the party is adversely affected." **Id (1) (b).**

Cases:

Ganim v. Smith & Wesson Corp., 258 Conn. 313, 326 (2001).

Mash v. Lugo, 49 So. 3d 829 (Fla. 5th DCA 2010)

XL Vision, LLC. V. Holloway, 856 So. 2d 1063 (Fla. 5th DCA 2003),

Steinhardt v. Banks, 511 So. 2d 336 (Fla. 4th DCA 1987)

Court's inherent powers to address & regulate abusive practices: *Vargas v.*

Peltz, 901 F. Supp. 1572, 1579 (S.D. Fla. 1995, *Malautea v. Suzuki Motor Co.*, 987 F.2d 1536, 1545 (11th Cir.), cert. denied, 510 U.S. 863 (1993), *Aoude v. Mobil Oil Corp.*, 892 F.2d 1115, 1118 (1st Cir. 1989, *Pope v. Federal Express Corp.*, 138 F.R.D. 675, 683 (W.D. Mo. 1990), aff'd in part, vacated in part on other grounds, 974 F.2d 982, 984 (8th Telectron, Inc. v. Overhead Door Corp., 116 F.R.D. 107, 126 (S.D. Fla. 1987Cir. 1992, *Link v. Wabash Railroad Co.*, 370 U.S. 626, 630-632 (1962).

See also *Aoude*, 892 F.2d at 1118; *McDowell v. Seaboard Farms of Athens, Inc.*, 1996 WL 684140, 2-3 (M.D. Fla. 1996) (cases cited therein); *Sun World*, *Pope*, 138 F.R.D. at 682 *Inc. v. Lizarazu Olivarría*, 144 F.R.D. 384, 389 (E.D. Cal. 1992), *Amway Corp. v. Shapiro Express Co.*, 102 F.R.D. 564, 569-70 (S.D.N.Y. 1984); *Cox v. Burke*, 706 So. 2d 43 (Fla. 5th DCA 1998); *Kornblum v. Schneider*, 609 So. 2d 138 (Fla. 4th DCA 1992), *Savino v. Florida Drive-In Theatre Mgt., Inc.*, 697 So. 2d 1011 (Fla. 4th DCA 1997, *O'Vahey v. Miller*, 644 So. 2d 550 (Fla. 3d DCA 1994); *Kornblum v. Schiender*, 609 So. 2d 138 (Fla. 4th DCA 1992); *Horjales v. Loeb*, 291 So. 2d 92 (Fla. 3d DCA 1974), *Hazel Atlas Glass Co. v. Hartford Empire Co.*, 322 U.S. 238 (1944)

Fraud Upon The Court: Cox, 706 So. 2d at 46 (quoting Aoude, 892 F. 2d at 1118, Smith v. Department of HRS, 522 So. 2d 956 (Fla. 1st DCA 1988, Slomowitz v. Walker, 429 So. 2d 797, 800 (Fla.4th DCA 1983).

See also Small Business Admin. v. Echevarria, 864 F. Supp. 1254 (S.D. Fla. 1994), Figgie Int'l, Inc. v. Alderman, 698 So. 2d 563, 567-68 (Fla. 3d DCA 1997) ,(citing O'Vahey for the proposition that "the ultimate sanctions of dismissal or default are justified by the repeated presentation of false testimony..."), Cox, 706 So. 2d at 45, 46. "...The integrity of the civil litigation process depends on the truthful disclosure of facts.", "repeated fabrications"...and undermined the integrity of his entire action." Savino, 697 So. 2d at 1012, "the most egregious case of discovery abuse [the] court [had] ever seen." Figgie Int'l, 698 So. 2d at 564, Vargas- Id. at 1582: "designed to and had the effect of obstructing the discovery process and impeding...ability to conduct discovery vital to its defense... warranted the dismissal.", Pope, 138 F.R.D. at 682: "dismissed a claim, based on evidence that (the party) had fabricated a document which purported to support (the) claim and then lied about its authenticity and the circumstances relating to its transmission..."

Non-Compliance With Court Orders: Bailey v. Woodlands Co., 696 So. 2d 459 (Fla. 1st DCA 1997); Ferrante v. Waters, 383 So. 2d 749 (Fla. 4th DCA 1980, Fla. 5th Levine v. Del American Properties, Inc., 642 So. 2d 32 DCA 1994, Marr v. State, Dept. of Transp., 614 So. 2d 619 (Fla. 2d DCA 1993, Dominguez v. Wolfe, 524 So. 2d

1101 (Fla. 3d DCA 1988, Johnson v. Landmark First Nat'l Bank, 415 So. 2d 161 (Fla. 4th DCA 1982).

Legal Responsibility Of Counsel: Rule 4-3.3(a) (4), Dodd v. The Florida Bar, 118 So. 2d 17, 19 (Fla. 1960, The Florida Bar v. Kleinfeld, 648 So. 2d 698, 701 (Fla. 1994), The Florida Bar v. Agar, 394 So. 2d 405 (Fla. 1980, Kozel v. Ostendorf, 629 So. 2d 817 (Fla. 1994)

Other Authorities:

Judge William Alsup of the U.S. District Court for Northern California:

<https://www.govexec.com/workforce/2025/03/judge-orders-reinstatement-most-fired-probationary-federal-workers/403721/> "It's a sad, sad day ...when they know good and well that is based on a lie."

Anne Bowen Poulin: Villanova University School of Law

<https://www.pennstatelawreview.org/116/2/116%20Penn%20St.%20L.%20Rev.%20331.pdf> "Convictions Based on Lies: Defining Due Process Protection".

Florida Bar Journal: Donald A. Blackwell: "The Big Lie-False And Misleading Testimony By A Civil Litigant Does Have Serious Legal Consequences."

<https://www.floridabar.org/the-florida-bar-journal/the-big-lie-false-and-misleading-testimony-by-a-civil-litigant-does-have-serious-consequences/>

Nota: There have been significant state and federal appeals regarding illegal evictions and related, wrongful, or forced displacement, particularly arising from constitutional rights violations.

Key examples of federal appeals in this area include, but are not limited to:

In *Reitman v. Mulkey*, the Supreme Court held that discrimination in the housing market under a constitutional amendment allowing landlords arbitrary discretion in selecting tenants as a matter of right was "a significant state involvement in private discriminations . . . [that would] amount to unconstitutional state action. It has been held that a public housing authority may not discriminate arbitrarily between persons and classes in leasing its premises. Furthermore, in *Chicago Housing Authority v. Blackman*, the court decided that a public housing authority could not discriminate arbitrarily against existing tenants in their right to continue occupancy. Finally, in *Edwards*, (employing the constitutional arguments of Judge Wright's opinion, without having to resort to his discussion of statutory construction) the prevention of public retaliatory evictions may be extended to the private sector under the Shelley doctrine.

Therefore, the action instituted by the landlord to evict the tenant must not hinder her constitutionally protected right to petition the government for grievances.

However, under present holdings, the right of the individual to seek redress for his grievances is a fundamental first amendment right which outweighs the right of a retaliating landlord to evict tenants. Notwithstanding the protection afforded by this case, the landlord may resort to other effective means of

retaliation-the raising of rent or subsequent evictions of the tenant for trivial violations of skillfully written leases. Nonetheless, the holding in the Edwards' case, at least to some degree, allows the tenant to strive for better housing conditions without the fear of eviction for his actions.

Retaliatory evictions, which heretofore have been unpermitted in public housing projects," may also be prohibited in the private sector. Landlord and Tenant-

Retaliatory Evictions, HARV. CIV. LM.- CIV. RIGHTS L. REV. 193, 195 n.9 (196).

7Rudder v. United States, 226 F.2d 51, 53 (D.C. Cir. 1955). 8 1d. 9 See, e.g.,

Resolution of Talladega, Alabama, May 29, 1968, in Lewis v. Housing Authority

of Talladega, Alabama, 397 F.2d 178, 180, 181 (5th Cir. 1968). 10 386 U.S. 670

(1967). 11Id. 12Id. 13 Edwards v. Habib, 397 F.2d 687, 691 (D.C. Cir. 1968).

Shelley v. Kraemer, 334 U.S. 1 (1948).

[https://researchrepository.wvu.edu/cgi/viewcontent.cgi?article=3273&context=wv
lr#:~:text=The%20Supreme%20Court%20was%20not,and%20Urban%20Develop
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lr#:~:text=The%20Supreme%20Court%20was%20not,and%20Urban%20Develop
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V. Petition for Writ Of Certiorari

Ms. Jo-Anne Sparta, Petitioner *Pro Se*, respectfully petitions this court for a Writ of Certiorari to review the judgment of the Florida Supreme Court, for their refusal to review her Appeal to the State District Court of Appeals, violating her civil and constitutional rights.

VI. Opinions Below

The final decision by the Florida Court of Appeals denying Petitioner Sparta's direct appeal is reported as Sparta vs Related Affordable et al, Case - 4D2025-0725 L.T. No. - 502023CA012067, on January 23, 2026. Copy-Appendix A, Subsequent Mandate from the Court of Appeals follows on February 12, 2026. Copy- Appendix B, Final Dismissal from the Florida Supreme Court issued on February 16, 2026- Appendix C.

VII. Jurisdiction

Petitioner's Notice to Invoke Discretionary Jurisdiction for hearing to the Florida Supreme Court was denied on February 16, 2026. Ms. Sparta, Petitioner *Pro Se* invokes this Court's jurisdiction under 28 U.S.C. § 1257, having timely filed this petition for a Writ of Certiorari within ninety days of the Florida Supreme Court's decision. **Nota:** No motion for rehearing or reinstatement was permitted.

Supreme Court Of The United States

No _____

Jo-Anne Sparta,

Petitioner,

SC2026-0256 Lower Tribunal

No(s): 4D2025-0725;

502023CA012067XXXXMB

v.

RELATED AFFORDABLE,

LLC, TRG MANAGEMENT

COMPANY LLP, and SA

RESIDENCES

PRESERVATION, L.P.,

Respondents

Statement Of Issues On Appeal

1.) The Petitioner's complaint alleges the lower court's premature Final Order because of numerous continuing misreads, omissions, lack of reviews of evidentiary materials, confusion on rulings and hearings, lack of redress of: non-compliance, abuses of process, fraud upon the court and the violated legal responsibilities of counsel left unaddressed that precluded her from receiving the court's fair and legally warranted applications set forth in Art. I, § 21, leaving grounds for Art. V, § 4 and application of § 9.110 , and Rule 1.530.

2.) Respondents' defense was entirely based on easily refutable lies, which grossly affected the outcome of the lower court's decision. Both Judge Alsup and Anne Bowen Pulin have officially noted the warping of accessible justice,

1-a

and the need for review and changes, when everything offered by the opposition is all lies. See Florida Bar Donald A. Blackwell's The Big Lie..." Respondents also defamed Petitioner's character with their lies, in violation of § 90.609 and § 3 837.02, causing the harm and damages stated in her Causes of Action and Demand Letter, all readily available for evidentiary corroboration in the court transcripts.

3.) Petitioner asserts that her rights have been violated by the unconstitutionality of proceedings, both the Florida and the United States Constitutions. Not only precluding any evidentiary means of corroboration to be reviewed, non-compliance on nearly every procedural step and court order by the Respondents not addressed by the lower court, but the subsequent allowance of lies that protected Respondents in their defamation and perjury, all of which acted as a complete bar to Petitioner's Causes of Action claims in all her submissions. Fair, honest and complete judicial review and response was not possible and could have been rectified as per § 90.104: id (1) (b).

Nota: This Statement Of Issues On Appeal accompanies the Form 4 document for the Motion To Proceed In Forma Pauperis.

VIII. Constitutional Provisions Involved

United States Constitution, Amendments V and XIV:

The clause in the Fifth Amendment to the United States Constitution provides: "No person shall ... be deprived of life, liberty, or property, without due process of law.

The clause in Section One of the Fourteenth Amendment to the United States Constitution provides:" nor shall any State deprive any person of life, liberty, or property, without due process of law.

The Petitioner was *never* granted due process of law, from her very first brief, which had more valid claims never reviewed and rejected, albeit copious exhibits of evidentiary proof. Nor was she ever able to circumvent clauses and other imposed, illegal actions preventing her from obtaining a jury trial.

Nota: If the Supreme Court reviews the Petitioner's case, they will readily find violations of:

-First Amendment: Petitioner was retaliated against for filing complaints regarding unsafe and unhealthy living conditions and illegally forced from her home.

- **Fourth Amendment:** Petitioner was subjected to an onslaught of invasive visits without notice, documented by contemporaneous notes from her and other residents, which precluded any securing of her "...houses, papers, and effects". Her belongings were damaged and stolen, also documented.

-**Ninth Amendment:** the enumeration of specific rights in the Constitution does not mean other, unenumerated rights retained by the people are denied or disparaged. It can be invoked to support rights not explicitly stated, as is the case here, with the courts needing to update as per the current barrage of real estate developers and their management companies literally harming people, destroying their privacy and belongings, punishing them with illegal retaliatory actions and ultimately destroying lives with impunity after proceedings rife with lies that have been accepted as truth, corrupting any possibility of fair and due proceedings.

IX. Statement of the Case

Respondents Related Affordable, SA Residences Preservation and TRG Management have affiliated positions to and with each other. See Ex 1, 2, 3. They conspiratorially teamed up to manage and cover up the severely unsafe and unhealthy living conditions forced on the senior population of nearly 400 people, many of whom were disabled, like the Petitioner. All three Respondents were aware of the asbestos, silica and black mold apparent in the building, having received confirmation from certified inspectors.

See Video Ex 13, 14 and 15, also Ex 20, 21 and 41, and original Ex B.

Respondents knew explicitly their actions and inactions were illegal and causing harm and damage, acting conspiratorially and in a relay tandem. They repeatedly told the Petitioner that she was never exposed to any toxic substances, and that her apartment was safe and a healthy environment.

These statements were egregiously false and proven so by evidentiary documentation. The three companies are affiliated both legally and operationally, shifting roles to evade accountability when needed. The bribery, corruption and conspiracy evident in the actions and inactions of the Respondents publicly established a pattern of conduct of the Related Companies and their affiliates. See millions in fines by the NFL:

<https://therealdeal.com/newyork/2022/08/02/violations-of-unprecedented-scope-and-severity-nflfines-stephen-ross-for-tampering-with-tom-brady/>

See also housing, personnel and other millions in fines for violations:

<https://violationtracker.goodjobsfirst.org/parent/related-companies>

The Petitioner also submitted evidence of bribery, coercion, tampering, retaliation, threats and other illegal activity against her, other residents who complained, and people bribed to lie for the Respondents. See Ex 30, 31 and 32. Respondents illegally fabricated gross and egregiously false accusations against the Petitioner, to have a legal means to force her from her home.

See Ex: 7-10. When HUD opened an investigation requested by the Petitioner, See Ex 27, the Respondents lied again, not only with the false allegations used in the Exhibits listed, but adding incidents that occurred with other complainants to her record, that she was never a part of. See original Exhibits: L-9: Mary Woody.

Nota: This is standard practice in affordable housing buildings. If a resident complains, they are put on "probation" and eventually, their lease is not renewed for a variety of fabricated allegations. The Petitioner is one of thousands that have suffered this for asking owner/management to provide what was legally required: a safe, habitable, apartment with working goods and services as required by law. See Ex 4-5, 20,21,26,27, 28,40,41.

For a period of nearly a year, Petitioner sent witness statements, contemporaneous notes, photos, expert testimony, videos and an ongoing collection of emails, texts and certified letters detailing the unsafe and unhealthy conditions she was forced to live with, to no avail.

See Ex 11-12, and Video Ex 13-19, and Ex 20, where the West Palm Beach Housing Authority confirms failure of multiple inspections to remediate flaking asbestos in Petitioner's apartment, see EX 21.

These are just a few of dozens sent to both the President of Related Affordable, Matthew Finkle, the Vice President, David Pearson, and TRG

Executives, see Ex 28 and 29 to TRG's Doug Zimmer. Ex 29 is where he lies outright and states that "you have not been exposed to asbestos", refuting the management's notice to the Dept. of Health, see original Ex B from Mr.

Morales, the confirmation from HUD, see Ex 20, the confirmation of asbestos and silica on torn up window frames by a third party, see Ex 21, and corroborating Video Ex14 and the totality of photos and videos on record.

See Exhibit Lists, both original and revised for the Fourth and Fifth Complaints. Petitioner also sent the medical responses she received as a result of chronic exposure to toxins and documented that it was happening to others who came to her as well to see what could be done. See Ex 22 and 23, and original Ex R-Resident Notes given to the Petitioner in hopes of help.

Instead of rectifying the situation with repairing & maintaining her apartment immediately, or moving her to another apartment or building, Respondents began a barrage of harassment, intimidation, retaliation and threats through lawyers' letters. See EX 7-10, that added additional stress and damages.

This is illegal behavior and absolutely qualifies for the Causes of Action in Petitioner's Complaint. See Ex 4-5, 26, and 40. Additionally, they bribed the initial complainant, Jack Hairston, another resident who had been working with the Petitioner trying to resolve the issues, to be quiet and move out of the building, which he did.

See Ex 31. **Nota:** Jack Hairston died shortly after from pneumonia-related lung issues. *He and the Petitioner were the only residents not given hotel arrangements when they began tearing holes in asbestos ceilings.* See Video Ex 13, from June 20, 2022. Another resident, Michael Blumenau, was also fighting with management, receiving aggressive letters, and working with the Petitioner. See Ex 36 and 37, which Mr. Blumenau gave to the Petitioner when he asked for her help.

But then suddenly, changed his tune and falsely claimed the Petitioner forged his signature on a letter to management. Petitioner has repeatedly asked both Mr. Blumenau and the Respondents for the original copy of the alleged forged letter, which was used in part to force Petitioner out, See Ex 35, but the original letter was never produced, either by Mr. Blumenau, nor any of the Respondents. Petitioner also requested an original copy of the lease in question, which Respondents say Petitioner signed acknowledging no request for a jury trial. The original copy was never produced.

Additionally, there is no year listed on the copy submitted by the Respondents, begging the question of a cut and paste to satisfy their agenda. The lack of these original documents being produced should have been, and is, subject to additional scrutiny by the court.

Petitioner asserts that the documents were forged, or otherwise falsified,

which is a pattern of conduct with the Respondents. See Ex 30, in which incidents mounted against the Petitioner and other complainants, were confirmed to the Petitioner by several staff members in writing. Also, no staff concerning incidents alleged against the Petitioner ever contacted her for her side of the alleged events and never scrutinized for any corroboration or verification.

Yet these alleged incidents constitute the crux of Respondents' justifiable actions or inactions against the Petitioner. After receiving the Notice of Non-Renewal of Lease dated June 30, 2023-Ex 7, Petitioner filed her Amended Complaint on July 20, 2023. Petitioner was forced to incur thousands in costs, as itemized in her Demand Cost Letter, see Ex 6, which has since been updated several times, including a small camper van she now lives in.

It is noteworthy that the Respondents lied about the Petitioner damaging the lobby and her apartment door. See Ex 7-10. Damaging the property was used repeatedly as a reason to illegally force the Petitioner out, yet, see Video Ex 25, which clearly shows TRG's Nicole Martinez returning Petitioner's full security deposit plus interest, refuting the lie they used with their own staff, verifying there was No Damage by the Petitioner anywhere.

Also witnessed by Jackie Perez, previous service director, now the building

manager, who refused to answer emails and calls from frantic, frightened residents like the Petitioner, May Woody, and others, having been told by the Respondents that we were being evicted and not to reply.

Again, these are illegal activities, prohibited by city, state and federal laws mentioned herein, conspiratorially perpetrated to prevent any resident who complained, from getting information or assistance. In issuing its legal opinion and otherwise rendering advice, the Respondents, through their counsel, made the following intentional fabrications, omissions of material facts, and obfuscation of proceedings:

Stating falsely there was no exposure to asbestos, silica and black mold, contrary to submitted evidence. Stating falsely that the Petitioner was forced out due to her egregious behavior, which is refuted by the evidence, and even their own staff. Abusing the system's process by refusing to adhere to the DCMJT issued on September 22, 2023. Refusing to abide by court-ordered timelines; Resetting of Jury Trial Date issued on October 21, 2024 and November 13, 2024. Order to Comply with Pretrial Stipulations, dated Dec. 4, 2024.

It is worth noting that these are not the only mandated orders that counsel for the Respondents ignored, missed the deadline to reply, or stalled with motion hearings that ultimately were successful in moving all dates to the future.

Also noteworthy, the lower court was compelled to issue a Court Order To Mediate, issued on November 19 2024, because of Respondents and their counsel refusing to participate in good faith. *They never provided any complete Pretrial Stipulation documents as required*, nor were they sanctioned for the stalling, frivolous motions and refusal to adhere to court-ordered and other legal requirements.

Additionally, they agreed to certain terms in the documents, but reneged in order to force changes in dates, offered to include verbiage, then purposely refused to include, ignored communicating to ensure the Petitioner spent more time on fulfilling requirements they did not, sending unfillable pdfs that Petitioner was forced to convert and reformat, delays of court requirements and times, all obviously effectuated to negate honesty or good faith responses in these proceedings. See email from Clyde Gallagher, dated November 24, 2024, just one of dozens.

Petitioner provided all documents requested and was ignored. The Respondents and their counsel did not provide any acceptable witness, except Michael Blumenau, who was originally charged by the Petitioner as a defendant in these proceedings. No other actual names appear.

As for an exhibit list, nearly every line begins with "Any and all" in Respondents exhibit/witness list document.

See Respondents' December 3, 2024 submission. "Any and All" will not be accepted-See Judge Sheperd's Order For Trial And Pretrial Procedures, dated May 9, 2019.

This was never questioned by the lower court, as yet again, it demonstrates a willful failure to comply by the Respondents that was left unaddressed.

Respondents refused to initially participate in any of the Pretrial proceedings, banking on stalling until relevant dates had passed, then re-requesting a Motion To Dismiss.

This is a matter of court record. The only compliance was forced by the lower court in their Order To Mediate, on November 19, 2024. The lower court also sent several direct emails telling all parties they must submit all their Pretrial documents by certain dates, which Petitioner did, but Respondents did not. See emails concerning the lower court and the two opposing parties from October 22 through December 21, 2024.

No response was provided to Petitioner's Interrogatories, although she responded completely to theirs. See Motions filed by Petitioner: July 21, 2024-Motion To Compel Mediation-Motion For Status Hearing, Nov. 22, 2024-Motion To Compel Compliance, Motion For Non-Compliance and Request For Sanctions-December 12, 2024, Objection to Defendants' Witness and Exhibit Lists- December 5, 2024.

Nota-the Objection to the Combination Witness and Exhibit List gives a detailed synopsis of the many refusals of counsel for the Respondents to comply, and is *a clear pattern of conduct as to the abuse of the legal process to stall, obfuscate and waylay the proceedings.*

The Objection To The First Set Of Defendants' Interrogatories, dated December 6, 2024, states what Petitioner continually asserts, that the tactics used and left unaddressed, are obviously designed to drown the Petitioner in frivolous, absurd and inapplicable requests for information.

Additionally, Petitioner received letters from third parties stating the Respondents' counsel never followed up once they received the authorization from the Petitioner for information they requested. An obvious, time-wasting ruse which should not been allowed.

It is abundantly clear that Respondents and their counsel banked on everything being dismissed, and so never complied at any point legally, or in good faith, with the required, mandated and legally acceptable responses due in proceedings. These actions and inaction were and are subject to court scrutiny, as it grossly and adversely affected the Petitioner's case and subsequent dismissal.

There remains the review of the unusual activities of the lower court from the ruling on November 20, 2024:

“ORDER GRANTING DEFENDANT'S MOTION TO DISMISS COUNTS I-IV, VIIIIX, AND XII-XIII OF THE FOURTH AMENDED COMPLAINT, OR FOR A MORE DEFINITIVE STATEMENT”, through the granting of the “ORDER GRANTING DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S FIFTH AMENDED COMPLAINTWITH PREJUDICE” on February 28, 2025.

The following is noted: After more than a week of deliberation, the lower court ruled that 5 Counts, V, VI, VII, X and XI were admissible, and that Petitioner could represent her complaint. *Petitioner resubmitted the exact verbiage of the accepted Counts in her Fifth Amended Complaint, skipping other legitimate Counts, in an effort to expedite proceedings and anticipating a favorable ruling.*

Petitioner noted that the acceptance of Negligence against SA Residences Preservation, seemed incomplete without Negligence against Related Affordable, since the record clearly showed that Related Affordable “makes all decisions related to the property”, ergo effectively piercing the corporate veil. See Respondents Motion To Dismiss The Fourth Amended Complaint, Page 17, Paragraph 2, dated October 14, 2024.

On January 2, 2025, the lower court stated it was unaware of what Motions and other items should or would be heard that day. Hearing was reported to January 7, 2025.

On January 7, 2025, the lower court falsely stated that it had dismissed Petitioner's Fourth Amended Complaint in its' entirety, which the court transcripts will confirm is what the court said, but is in fact inaccurate.

The Petitioner asserts, and the court transcripts confirm, that there was a definite confusion surrounding the proceedings between the end of October, 2024, and the final dismissal in February, of 2025, which called for review and scrutiny, and adversely affected the ruling for the Petitioner.

After nearly two months of silence from the court, which it is worth noting, had never occurred before in the more than a year and a half of ongoing proceedings, the lower court accepted a Proposed Order from the Respondents on February 28, 2025.

The lower court refused acceptance of the Petitioner's Proposed Order, accompanying letter and Response in Opposition, filed also on February 28, 2025, within a few hours of the Respondents' Proposed Order.

This inequality of accepted Proposed Orders is neither just nor fair, as we are both parties in these proceedings. Petitioner asserts both parties' documents should have been accepted for review, especially because of the confusion at the hearings in January, the time elapsed without a response from the court, the forcing of Respondents' proposed order, and the refusal to accept the Petitioner's same.

Re-citing *Ganim v. Smith & Wesson Corp.*, 258 Conn. 313, 326 (2001), and § 1.530. See also Petitioner's Letter to the Judge, and her "Response In Opposition To Defendant's Proposed Order, both submitted February 28, 2025. The same day as the Petitioner's Proposed Order, within a few hours of each other. These documents were refused by the lower court clerk, as was her own Proposed Order, filed the next day.

Petitioner asserts her rights were violated as a party in these proceedings by the lower court accepting documents from the Respondents, but not the Petitioner.

Additionally, the lower court's on the record confusion about hearings, content, evidence, and the error in stating that Fourth Complaint had been dismissed, stated in the January 7, 2025 Hearing, calls to question if the court had confused elements in these proceedings, and ruled in error, was the final ruling extrapolated from the confusion and this error?

As a direct result, one can reasonably conclude that the dismissal with prejudice that so adversely and finally affected the Petitioner, was a result of the continued confusion and error, and should be reviewed and reversed.

Petitioner has suffered irreparable losses, damages to her health, incurred thousands in debt, and has been otherwise reputationally and financially destroyed.

This is not hyperbole, melodrama, or a plea to the court for sympathy. The losses, damages and irreparable harm are factually documented and corroborate Petitioner's Complaint.

Contrary to the Respondents' case, which has absolutely no corroboration whatsoever, no exhibits, no witnesses, no adhering to format, content, rules, deadlines, court-orders, and other legally mandated requirements, omitting many material facts.

Respondents have smugly ignored negotiating in good faith and in these proceedings, abused the system in ways that should not be permitted, and only produced a collection of lies the Petitioner has easily refuted with more than 100 pieces of evidence.

Everything is on record. On April 15, 2025, the trial court entered its Final Order of Dismissal with Prejudice ("Order"), in which the court stated that Petitioner's case demonstrated a "failure to state a cause of action."

Petitioner continued to file the appropriate responses available to her, which are included in the Appendix..

X. REASONS FOR GRANTING THE WRIT

Petitioner raises three grounds for review to grant the Writ:

1.) The trial court's dismissal after two months of silence without a ruling was premature because:

a.) The court reviewed the Respondents' Proposed Order request, but not the Petitioner's, which was refused by the court clerk, albeit that they were filed within an hour of each other. See court records. Additionally, See *Gannon v Smith & Wesson Corp*: "It is well-established that in ruling upon whether a complaint survives a motion to dismiss, a court must take the facts to be those alleged in the complaint, including those facts necessarily implied from the allegations, construing them in a manner most favorable to the pleader." The court did not review Petitioner's Proposed Order, nor any of the Exhibits or the Witness list. Additionally, Respondents' systematic lies had no corroboration, and they refused to ever provide a shred of evidence, or a Witness or Exhibit List, see court records, as mandated by the Pretrial Stipulations, leaving grounds for application of Rule 1.530.

b.) The lower court's order stating there "was no cause of action" does not reflect the truth in evidentiary submissions that were never reviewed, nor the applicable subsequent legal arguments, state and federal, both offered by the Petitioner, and abusively used by the Respondents, nor the lies told by Respondents and counsel, and their refusal to provide any corroborating evidence., which would most likely have resulted in a more just outcome for the Petitioner. See § 90.104 (1) (b)

c.) The courts should always consider: Court's inherent powers to address & regulate abusive practices, Fraud Upon The Court, Non-Compliance With Court Orders, and Legal Responsibility Of Counsel. See cases listed above. The Petitioner asserts that because of these issues not being considered or addressed, she was unable to approach any semblance of truthful presentation, which would have most probably led to a more just and favorable adjudication.

Synopsis From the Statement of Issues: The Petitioner's complaint alleges the lower court's premature Final Order because of numerous continuing misreads, omissions, lack of reviews of evidentiary materials, confusion on rulings and hearings, lack of redress of: non-compliance, abuses of process, fraud upon the court and the violated legal responsibilities of counsel left unaddressed that precluded her from receiving the court's fair and legally warranted applications set forth in Art. I, § 21, leaving grounds for Art. V, § 4 and application of § 9.110 , and Rule 1.530.

2.) The Respondents based their case on lies the Petitioner refuted with evidence. Federal courts in both California, Maryland and other states have 10 repeatedly ruled against actions taken by any Defendant whose arguments were "based on a lie".

See Judge William Alsup of the U.S. District Court for Northern California. And Anne Bowen Poulin of the Villanova Law Review, about rulings made "...Based on Lies"---Due Process Protection" listed above.

It is worth reviewing the lack of recourse when parties lie outright, warping the subsequent orders and convictions. Additionally, Respondents' lies attacked the Petitioner's character and the proceedings never achieved time or allowance for the Petitioner to refute or corroborate anything. See § 837.02 and § 90.609.

Finally, see Donald A. Blackwell:" The Big Lie-False And Misleading Testimony By A Civil Litigant Does Have Serious Legal Consequences." The Petitioner asserts she was effectively barred from any fair and just judicial responses because the lies forming the crux of Respondents' arguments were never addressed.

Synopsis From Statement of Issues: Respondents' defense was entirely based on easily refutable lies, which grossly affected the outcome of the lower court's decision. Both Judge Alsup and Anne Bowen Pulin have officially noted the warping of accessible justice, and the need for review and changes, when everything offered by the opposition is all lies. See Florida Bar Donald A. Blackwell's The Big Lie..."

Respondents also defamed Petitioner's character with their lies, in violation of § 90.609 and § 3 837.02, causing the harm and damages stated in her Causes of Action and Demand Letter, all readily available for evidentiary corroboration in the court transcripts.

3.) The violation of the Petitioner's rights vis-à-vis the lower court's proceedings bears additional scrutiny:

a.) The Petitioner stated the Related Affordable company was liable for Negligence, and the lower court denied the Count, even though as per piercing the corporate veil, Petitioner provided proof that the parent company made all the decisions, See Exhibits 1 and 2.

Additionally, Respondents' own counsel put it in writing on page 17, Paragraph 2 of the Motion to Dismiss the Fourth Complaint, that "SA Residence owns the property and Related makes all the decisions related to the property".

Therefore, the court was remiss in accepting SA Residence for Negligence, but not Related Affordable, especially since the companies used illegal means to force legal actions against the Petitioner.

See XL Vision, LLC. v. Holloway, 856 So. 2d 1063 (Fla. 5th DCA 2003) and Steinhardt v. Banks, 511 So. 2d 336 (Fla. 4th DCA 1987).

b.) The court below disavowed its' own ruling that had accepted the five Counts from the Fourth Complaint. Based on the admissibility the court had already granted, Petitioner re-submitted the Counts verbatim in her Fifth Amended Complaint.

The court then reversed its' decision without reference, new material, evidentiary foundation or explanation. And then only after a two-month silence, and only when Respondents sent a Proposed Order.

Although the lower court has the right to reverse its' decision, it did so only when prompted by Respondents counsel, and completely forgetting the events previously left in question: the confusion around the counts accepted in the Fourth Complaint, the confusion as to what was to be discussed in the January 2, 2025 Hearing, and the error the judge made when he stated wrongly in the January 7, 2025 hearing, that he had dismissed the Fourth Amended Complaint in its' entirety. See court records.

This calls the Final Order into question, and bears additional scrutiny, as to the confusion clearly apparent and on record, acceptance of lies as truth, disregard for compliance, timelines and court orders, basis for, and fairness of, the decision without evidentiary foundation or legal, fact-based logic. A thorough review of the lower court's back and forth as to admissible and inadmissible counts with the Fourth and Fifth Complaints, and subsequent

ruling to dismiss the Petitioner's case without any allowance for the continued confusion, misreading, lack of the court's addressing of abusive process by the Respondents and their counsel, no thorough review of evidence and hearings, as referenced in all 3 Counts For Review listed herein.

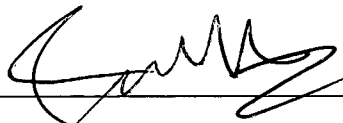
The Petitioner believes her rights were violated, and she was not given fair and just due process, and that she was adversely affected by these actions and inactions. See § 90.609, § 837.02 § 90.104, id (1) (b). See also: Other Authorities: Judge Alsup, Anne Pulin, and Donald Blackwell.

Synopsis From Statement of Issues: Petitioner asserts that her rights have been violated by the unconstitutionality of proceedings, both the Florida and the United States Constitutions. Not only precluding any evidentiary means of corroboration to be reviewed, non-compliance on nearly every procedural step and court order by the Respondents not addressed by the lower court, but the subsequent allowance of lies that protected Respondents in their defamation and perjury, all of which acted as a complete bar to Petitioner's Causes of Action claims in all her submissions. Fair, honest and complete judicial review and response was not possible and could have been rectified as per § 90.104: id (1) (b).

XI. CONCLUSION

NOTA: What happened to the Petitioner has happened to hundreds of thousands of citizens. Many, like the Petitioner, are seniors with disabilities, living on modest means. What is their recourse when the Respondents obtain legal results by perjuring themselves and coercing false testimony through threats and bribes? This is a matter of grave and urgent national importance. Greg Isles, in his book, *The Bone Tree*, captures the devastation: "...the true predators of 21st century America are the real estate developers..."

For the foregoing reasons, Ms. Sparta, Petitioner *Pro Se*, respectfully requests that the United States Supreme Court grant her Petition For A
Writ of Certiorari.



August 27, 2026_

XII. Appendix -Table Of Contents

Appendix A- Final Decision of State Court of Appeals (January 23, 2026)

Appendix B- Mandate From State Court of Appeals (February 12, 2026)

Appendix C- Decision of State Supreme Court Dismissing Case / Denying Review or Rehearing (February 16, 2026)