

COUNT IV – ABUSE OF PROCESS / RETALIATORY ENFORCEMENT

26. Enforcement was used as a weapon to coerce compliance and silence dissent, not to remedy legitimate violations.

27. Florida courts recognize retaliatory HOA enforcement as actionable misconduct.

White Egret Condo., Inc. v. Franklin, 379 So. 2d 346 (Fla. 1979).

RELIEF REQUESTED

Wherefore Plaintiff pro se respectfully requests that this Court:

- A. Conduct a **full trial de novo** on all issues;
- B. Declare the special assessment **void ab initio**;
- C. Enjoin enforcement or collection of the assessment;
- D. Vacate and supersede the arbitration order;
- E. Award costs and attorney's fees as permitted by law;
- F. Grant any such further and additional relief as deemed just and proper

JURY DEMAND

Plaintiff demands **trial by jury** on all issues so triable.

Respectfully Submitted:



Shawn Martin
Plaintiff pro se
1760 Northwest Seventy Third Avenue
Fort Lauderdale, FL 33313
T- (954) 716-0915

Certificate of Service Enclosed