

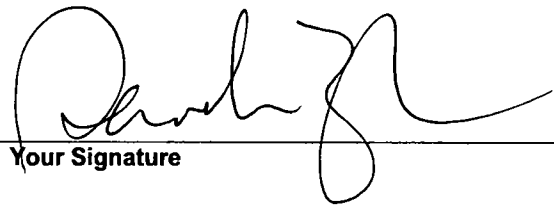


*N/A*

Today's Date:

11/27/2024

Your Signature



**This page must be completed and attached  
to the LAST page of your Motion/Request**

I filed the ORIGINAL of the attached document(s) with the Clerk of the Superior Court in Maricopa County on: November 27, 2024  
Month Date Year

I mailed/delivered a COPY of the attached document(s) to the Judicial Officer assigned to my case, Judge (or Commissioner): Coffey, on November 27, 2024 (Judicial Officer assigned to your case)  
Month Date Year

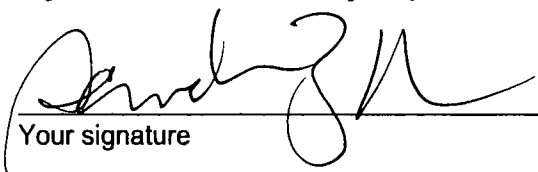
I mailed/delivered a COPY of the attached document(s) on this date:  
November 27, 2024 To: Gardens Gilbert Community Association et. al  
Month Date Year

***(You must mail a copy of all documents to the other side and his/her lawyer)***

<u>Gardens Gilbert Community Association et. al.</u> Name of Other Side	<u>Shaw &amp; Lines, LLC/Augustus H. Shaw IV</u> Name of Other Side's Lawyer
<u>4135 S. Power Road, Ste. 133</u> Address	<u>4523 E. Broadway Road</u> Lawyer's Address
<u>Mesa, Arizona 85212</u> City, State, Zip	<u>Phoenix, Arizona 85040</u> City, State, Zip

**By signing below, I state to the Court, under penalty of law, that the information stated on these pages is true and correct to the best of my knowledge and belief.**

**I further state that I have filed/mailed the attached document(s) as shown above. I understand that if I do not file/mail the attached document(s) as shown above, the judge in my case will not read my request/motion.**

  
Your signature

## **ADDENDUM A:**

### **PLAINTIFF'S RESPONSE TO DEFENDANT'S RESPONSE IN SUPPORT OF INJUNCTION OF HARASSMENT, ORDER OF PROTECTION FILED ON NOVEMBER 27, 2024**

#### **TO THE HONORABLE JUDGE COFFEY:**

Sandra Rodriguez, Plaintiff, submits this response to Defendants' Motion, which perpetuates the dismissal and misrepresentation of critical issues involving harassment, retaliation, and financial abuse directed at Plaintiff and her children. The Court's prior failure to act on Plaintiff's well-documented and substantiated pleas for relief has emboldened Defendants to escalate their misconduct, resulting in irreparable harm. This response underscores the extensive damages caused by the Court's inaction, outlines the legal obligations that mandate judicial intervention, and highlights the continued pattern of abuse perpetrated by Defendants.

In light of these ongoing injustices, Plaintiff respectfully requests the Court to take immediate action to quash the improper judgment, retaliatory liens, and stop the financial extortion orchestrated by Defendants and their legal counsel, Augustus H. Shaw IV. The sustained campaign of harassment and legal abuse has inflicted severe emotional, financial, and reputational harm on Plaintiff and her family. Beyond granting relief, Plaintiff urges the Court to hold Defendants and their counsel accountable by reporting their unethical and unlawful conduct to the appropriate regulatory and ethical bodies, ensuring the protection of other consumers from similar abuse.

#### **BACKGROUND AND HISTORICAL CONTEXT**

The case between Sandra Rodriguez (Plaintiff) and the Gardens Gilbert Community Association (GGCA), Focus HOA Management, LLC, and its representatives Anna Schultz, Harmin Cadis, and Brooke Sortor (Defendants) exemplifies an escalating pattern of harassment, financial abuse, and retaliation rooted in a profound misuse of authority by Defendants. The

following timeline provides a detailed account of events and actions, highlighting the context for Plaintiff's claims and the irreparable harm caused.

### **Initial Conflict and Plaintiff's Advocacy (Late 2023–January 2024)**

#### **1. Neglected Community Maintenance:**

- Plaintiff raised concerns regarding persistent pet waste and foul odors near her property. Despite multiple complaints, Defendants, including community manager Brooke Sortor and Focus HOA President Harman Cadis, failed to address the issue.
- Sortor dismissed Plaintiff's complaints, claiming that the area in question was not her concern and attempting to justify her inaction by asserting that the areas where dogs were allowed to roam unleashed and leave fecal matter and urine were on community property. This response completely disregarded the legitimate health and safety concerns raised by Plaintiff, including the fact that dog fecal matter was frequently left less than two feet from her home, directly impacting the health of Plaintiff and her children. Cadis, instead of addressing the issue, deflected responsibility by denying any authority over Sortor, thereby evading accountability for the hazardous conditions. This lack of action and deflection further underscores their personal liability and failure to fulfill their obligations to address these pressing safety concerns.

#### **2. Silencing at HOA Meetings:**

- During the January 2024 GGCA Board of Directors meeting, Plaintiff attempted to escalate her concerns to Anna Schultz, GGCA HOA Board President. Instead of addressing these issues, Schultz in conjunction with Sortor muted Plaintiff's microphone during the Zoom meeting, revoked her permissions on the platform, effectively restricting her ability to participate, silenced her objections, and ultimately dismissed her concerns entirely.

### **Defendants' Escalation and Retaliatory Tactics (February–May 2024)**

#### **3. Targeted Discrimination:**

- Plaintiff's access to the HOA portal was revoked without justification, and both Defendants and their legal counsel, Augustus H. Shaw IV, refused to respond to her emails. This deliberate action effectively isolated Plaintiff from critical community resources, including access to assessments, account details, and other essential HOA information, further impeding her ability to address issues and participate in the community.
- Communication with HOA representatives was deliberately obstructed, as Focus HOA Management and its representatives purposefully ignored Plaintiff's emails, refusing to address real-time issues, including concerns about pet waste and other community management failures. When Plaintiff attempted to escalate these matters for resolution, Defendants involved their attorney, Augustus H. Shaw IV, in a clear attempt to harass and intimidate her. They further imposed a discriminatory policy restricting Plaintiff's communications exclusively to U.S. mail—a restriction not imposed on other homeowners—severely impeding her ability to address urgent issues. This conduct displayed a blatant disregard for Plaintiff's rights and the legitimate concerns she was raising at the time.

#### **4. Online Defamation Campaign:**

- Schultz and her husband, Matthew Schultz, engaged in online harassment, posting defamatory comments about Plaintiff in collaboration with Focus HOA employees, further damaging Plaintiff's reputation and isolating her within the community.

### **FINANCIAL EXTORTION THROUGH IMPROPER LIENS AND INFLATED ASSESSMENTS (June–August 2024)**

#### **5. Retaliatory Liens:**

- Shortly after Plaintiff questioned the HOA's financial practices, Defendants filed liens against her property under A.R.S. § 33-1807, citing inflated assessments. However:
  - The liens were filed without complying with procedural requirements.

- Plaintiff was denied access to the HOA portal, preventing her from verifying or addressing alleged debts.
- Defendants have also restricted all direct communication with Plaintiff, refusing to engage in any civil discussions to address the liens or resolve disputes. Instead, they have consistently resorted to retaliatory and punitive legal actions, further escalating the conflict and compounding the harm inflicted on Plaintiff.
- These actions violate A.R.S. § 33-420, which prohibits groundless liens and allows damages for bad-faith filings.

#### **6. Financial Coercion:**

- The liens were weaponized by Defendants as a tool of financial coercion, designed to exert maximum pressure on Plaintiff by obstructing her ability to refinance or sell her home. This deliberate act of financial extortion has inflicted severe economic and emotional hardship on Plaintiff and her family. The resulting financial strain forced Plaintiff to redirect critical resources away from meeting her family's basic needs, jeopardizing their stability and well-being. Furthermore, the uncertainty and stress created by these actions have significantly disrupted the lives of Plaintiff and her children, exacerbated their emotional distress and eroded their sense of security in their home.

#### **Escalation of Harassment During Litigation (September–November 2024)**

#### **7. Bad-Faith Litigation:**

- Defendants filed repetitive and frivolous motions, including labeling Plaintiff as a “vexatious litigant,” to discredit her claims and escalate legal costs.
- Attorney Augustus H. Shaw IV continues to consistently misrepresent facts to the Court, including denying procedural violations and dismissing Plaintiff's evidence of harm.

**8. Surveillance and Intimidation:**

- Defendants, associates, or their affiliated parties engaged in targeted surveillance near Plaintiff's home, causing fear and anxiety for Plaintiff and her children.
- These actions demonstrate a concerted effort to intimidate and silence Plaintiff.

**9. Court Inaction:**

- Despite multiple motions filed by Plaintiff seeking injunctive relief, an order of protection, and quashing of retaliatory liens, the Court failed to act in a timely manner. This inaction:
  - Allowed Defendants to escalate their harassment without consequence.
  - Further emboldened Defendants to use the judicial process as a tool of abuse.

**Ongoing Harms and Impact on Plaintiff**

**10. Emotional Distress:**

- **The constant harassment and financial instability** have inflicted severe emotional trauma on Plaintiff and her children, creating an unsafe home environment.

**11. Erosion of Rights:**

- **Plaintiff's exclusion from the HOA portal, silencing at meetings, and dismissal of her concerns** reflect systemic violations of her rights under the Fair Housing Act (42 U.S.C. § 3601 et seq.) and Arizona Nonprofit Corporation Act (A.R.S. § 10-3830).

**12. Financial Instability:**

- **Improper liens and inflated assessments** have placed Plaintiff under significant financial strain, jeopardizing her ability to retain her home and care for her family.

**BACKGROUND AND ESCALATION OF HARASSMENT**

The genesis of this case lies in Plaintiff's attempts to address community issues, including HOA mismanagement and discriminatory practices. Instead of resolving her legitimate concerns, Defendants launched retaliatory actions, including, but not limited to:

1. **Filing Retaliatory Liens:** Defendants filed liens under A.R.S. § 33-420, which prohibits groundless or bad-faith liens. The lien inflated assessments and was used as a tool of financial coercion to punish Plaintiff for raising legitimate concerns.
2. **Discriminatory Communication Restrictions:** Defendants imposed policies isolating Plaintiff, requiring her to communicate solely via U.S. mail while others could use modern, efficient methods like the HOA portal.
3. **Defamation and Intimidation:** Defendants engaged in targeted surveillance, online defamation, and harassment to discredit and isolate Plaintiff and her family.
4. **Manipulation of HOA Resources:** Defendants misused HOA funds, contributed by homeowners like Plaintiff, to finance legal actions designed to harass and retaliate against her.

## **DEMONSTRATING IRREPARABLE HARM**

The harm suffered by Plaintiff and her children transcends financial damage. Defendants' actions, including targeted harassment, discriminatory policies, and retaliatory liens, have caused:

1. **Emotional Trauma:** Persistent harassment and surveillance near Plaintiff's home have instilled fear and anxiety in her children, compromising their emotional well-being.
2. **Loss of Basic Rights:** Denial of HOA portal access and other discriminatory actions have impeded Plaintiff's ability to manage her property effectively, isolating her from community resources.
3. **Financial Abuse:** The lien filed against Plaintiff's property, riddled with procedural violations, constitutes legal and financial extortion aimed at forcing her to abandon her home and the community.
4. **Injustice Through Procedural Manipulation:** Defendants' misuse of legal tools to silence Plaintiff's lawful claims demonstrates bad faith and a disregard for her constitutional and civil rights.

The cumulative impact of these actions has created an unsafe environment for Plaintiff and her family, violating their rights and causing harm that monetary compensation alone cannot remedy.

## **QUASHING OF JUDGEMENT AND RETALIATORY LIENS**

The improper judgment entered against Plaintiff further compounds the harm by validating Defendants' abusive tactics.

### **Grounds for Quashing the Judgment**

#### **1. Due Process Violations:**

- Plaintiff was denied procedural fairness, as evidenced by the lack of notice and opportunity to fully address claims in the original proceedings. This violates constitutional protections established in **Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306 (1950)**, which requires meaningful notice and a fair opportunity to be heard.

#### **2. Retaliatory Nature of Defendants' Claims:**

- The judgment was based on filings designed to harass and financially burden Plaintiff rather than resolve substantive disputes. Courts have quashed judgments tainted by bad faith, as in **IB Property Holdings, LLC v. Rancho Del Mar Apartments, Ltd. P'ship, 228 Ariz. 61 (App. 2011)**.

#### **3. Fraudulent Use of HOA Resources:**

- Defendants leveraged HOA funds to pursue legal actions against Plaintiff, breaching their fiduciary duties under **A.R.S. § 10-3830**, which requires HOA boards to act in the best interest of all members.

## **JUSTIFICATION FOR QUASHING RETALIATORY LIENS**

#### **1. Violation of A.R.S. § 33-420:**

- Defendants filed liens knowing they lacked validity, inflating assessments while denying Plaintiff access to the HOA portal to address alleged debts.

#### **2. Financial Extortion:**

- The liens were used as leverage to coerce Plaintiff into silence and submission, constituting financial extortion prohibited under both state and federal consumer protection laws.

**3. Retaliatory Purpose:**

- The timing and nature of the liens demonstrate they were not legitimate attempts to collect debts but rather tools of harassment in retaliation for Plaintiff's lawful actions.

**DAMAGES CAUSE BY FINANCIAL EXTORTION**

The improper judgment, retaliatory liens, and escalating harassment have caused:

**1. Severe Financial Instability:**

- The liens and inflated assessments have prevented Plaintiff from refinancing or selling her home, jeopardizing her financial security.

**2. Emotional Distress:**

- Targeted harassment, surveillance, and isolation have caused profound psychological harm to Plaintiff and her children.

**3. Erosion of Community Trust:**

- Defendants' misuse of HOA funds and discriminatory practices undermine the integrity of HOA governance, harming not only Plaintiff but the broader community.

**SPECIFIC EXAMPLES FROM DEFENDANTS' MOTION AND ANALYSIS OF ABUSE**

The following list identifies specific examples from the Defendants' motion dated November 27, 2024, highlighting how these arguments and actions constitute harassment, abuse of process, and retaliation:

**1. Argument: Plaintiff's Request for Injunctive Relief Is Procedurally Deficient**

**• Defendants' Claim:**

- Plaintiff's request for injunctive relief under **A.R.S. § 12-1809** should be denied because:
  - It targets multiple defendants, which they allege violates **A.R.S. § 12-1809(B)(3)**.

- It lacks a verified petition or affidavit as required by **Rule 65 of the Arizona Rules of Civil Procedure**.
- **Abuse Identified:**
  - Defendants misuse procedural technicalities to avoid accountability for well-documented harassment. This tactic shifts focus from the substance of Plaintiff's claims to procedural barriers, further delaying relief.
  - Their argument ignores the collective nature of the harassment, where multiple defendants acted in coordination, making it unreasonable to limit injunctions to a single party.

## **2. Argument: Plaintiff Failed to Demonstrate Irreparable Harm**

- **Defendants' Claim:**
  - Plaintiff has not shown irreparable harm or a likelihood of success on the merits, a requirement for injunctive relief under **Shoen v. Shoen (1990)**.
- **Abuse Identified:**
  - Defendants dismiss the clear evidence of harm, including emotional distress, targeted surveillance, and financial coercion. This gaslighting minimizes Plaintiff's trauma while weaponizing legal standards.
  - This tactic ignores binding precedent, such as **IB Property Holdings, LLC v. Rancho Del Mar Apartments, Ltd. P'ship (2011)**, which emphasizes that irreparable harm includes harm not fully remedied by monetary damages.

## **3. Argument: Plaintiff's Order of Protection Is Invalid**

- **Defendants' Claim:**
  - Plaintiff's request for an order of protection under **A.R.S. § 13-3602** should be denied because she has not alleged acts of domestic violence.
- **Abuse Identified:**
  - Defendants' narrow interpretation of **A.R.S. § 13-3602** ignores its broader application to harassment causing imminent harm. Their claim misrepresents the statute's intent, delaying necessary protections for Plaintiff and her family.

- This argument downplays Plaintiff's documented fears for her safety, perpetuating a hostile environment while denying her access to legal safeguards.

#### **4. Argument: The Liens Are Valid**

- **Defendants' Claim:**
  - The lien filed under **A.R.S. § 33-1807** is valid, and Plaintiff failed to deny owing assessments or provide proof of payment.
- **Abuse Identified:**
  - Defendants omit key facts, such as blocking Plaintiff's access to the HOA portal, which prevented her from addressing alleged delinquencies. This manufactured delinquency is then weaponized as financial coercion, violating **A.R.S. § 33-420**.
  - Filing groundless liens inflates costs and exacerbates Plaintiff's financial strain, constituting financial extortion and retaliation for asserting her rights.

#### **5. Argument: Plaintiff's Motion Lacks Legal Support for Staying Collections**

- **Defendants' Claim:**
  - Plaintiff does not provide applicable statutory or case law to support her request to stay collections, nor does she specify which collection activities she seeks to halt.
- **Abuse Identified:**
  - This claim ignores Defendants' ongoing harassment through improper collection actions, including inflated fees and retaliation disguised as legitimate debt collection.
  - The argument attempts to discredit Plaintiff's financial hardships caused by Defendants' own procedural violations and bad-faith actions.

#### **6. Argument: Plaintiff's Request for Damages Is Improper**

- **Defendants' Claim:**
  - Plaintiff's requests for compensatory and punitive damages are unsubstantiated, unproven, and improperly pled.

- **Abuse Identified:**

- Defendants ignore clear evidence of harm, including financial instability caused by improper liens, emotional trauma from targeted harassment, and reputational damage from defamatory actions.
- This tactic seeks to minimize accountability by dismissing the severe impact of Defendants' actions as inconsequential or exaggerated.

## 7. Misuse of Sanctions

- **Defendants' Claim:**

- Defendants request sanctions against Plaintiff under *Rule 11 of the Arizona Rules of Civil Procedure*, citing her motions as frivolous.

- **Abuse Identified:**

- The repeated demands for sanctions by Defendants exemplify a clear pattern of bad-faith litigation, intentionally designed to punish Plaintiff for asserting her legal rights. These motions are not grounded in legitimate legal arguments but are instead wielded as a weapon to intimidate and financially burden Plaintiff, discouraging her from pursuing further legitimate legal action.
- Targeting Plaintiff, a pro se litigant, through persistent and baseless requests for sanctions reinforces the significant power imbalance between the parties. This tactic not only exacerbates Plaintiff's financial hardship but also creates a chilling effect on access to justice, aiming to deter Plaintiff and other similarly situated individuals from seeking legal recourse.

The repeated nature of these sanction requests highlights Defendants' calculated strategy to escalate retaliation and abuse under the guise of procedural compliance, further demonstrating financial coercion and legal extortion. These actions violate ethical standards and undermine the integrity of the judicial process. The Defendants' motion demonstrates a clear pattern of procedural abuse, misrepresentation of facts, and retaliatory litigation tactics designed to harass and intimidate Plaintiff. These actions, when viewed collectively, highlight a misuse of the legal system to perpetuate harm and avoid accountability. The Court should recognize these patterns as harassment

and take appropriate measures to grant Plaintiff relief and sanction Defendants for their abusive conduct.

## **RELIEF REQUESTED**

In light of these facts, Plaintiff respectfully requests the Court to:

1. **Grant an Injunction Against Harassment:** To immediately halt all actions by Defendants that perpetuate harassment and intimidation against Plaintiff and her family.
2. **Issue an Order of Protection:** To safeguard Plaintiff and her family from further targeted harassment, surveillance, and retaliation.
3. **Quash of Judgment:** To address the due process violations and retaliatory nature of the judgment entered against Plaintiff.
4. **Quash Retaliatory Liens:** To address the improper and bad-faith liens filed against Plaintiff's property and prevent further financial harm.
5. **Retract the Partial Dismissal:** To address the personal liability of Anna Schultz, Harman Cadis, Brooke Sortor, and Augustus H. Shaw IV.
6. **Allow Amendment of the Lawsuit to Include Augustus H. Shaw IV:** Due to his direct involvement in tortious acts, harassment, and egregious misconduct against Plaintiff and her family. Plaintiff requests leave to amend the lawsuit to include Augustus H. Shaw IV as a named defendant due to his direct involvement in tortious acts and egregious misconduct against Plaintiff and her family. Shaw's actions, including filing retaliatory and frivolous motions, misrepresenting facts to the Court, and facilitating harassment, exceeded the scope of legal representation and contributed directly to Plaintiff's harm. Under Rule 15, Arizona Rules of Civil Procedure, amendments are liberally granted when justice requires. Shaw's conduct violates ethical standards under the Arizona Rules of Professional Conduct (ER 3.1, ER 8.4) and supports claims of bad faith and malicious intent, making his inclusion as a defendant essential to holding all responsible parties accountable.

7. **Order a Halt to All Collections Activities:** To prevent Defendants from enforcing liens, collecting assessments, or engaging in related activities until the resolution of this civil case, appeals, or any other pending court proceedings.
8. **Impose Sanctions Against Defendants and Counsel:** For their bad-faith litigation tactics, ethical violations, and misuse of legal processes.
9. **Award Compensatory and Punitive Damages:** To address the financial, emotional, and reputational harm caused by Defendants' actions.
10. **Refer Defendants and Counsel to Regulatory and Ethical Bodies:** To ensure accountability for unethical and unlawful conduct, including referral to the Arizona State Bar, the Arizona Attorney General, and HUD.

## **REPORTING DEFENDANTS AND LEGAL COUNSEL**

Defendants' and Augustus H. Shaw IV's conduct must be reported to ensure accountability and protect consumers from similar abuses. The following avenues are appropriate for such reports:

1. **Arizona State Bar:**
  - The **Arizona Rules of Professional Conduct**, under **ER 3.1 (Meritorious Claims and Contentions)** and **ER 8.4 (Misconduct)**, prohibit attorneys from engaging in frivolous litigation, deceit, or conduct prejudicial to the administration of justice. Shaw's actions, including filing retaliatory motions and presenting misleading arguments, warrant investigation and potential disciplinary action by the Arizona State Bar.
2. **Arizona Attorney General's Office:**
  - The **Arizona Consumer Fraud Act (A.R.S. § 44-1521 et seq.)** addresses deceptive practices that harm consumers. Defendants' manipulation of HOA funds and discriminatory practices against Plaintiff constitute violations that should be investigated by the Attorney General.
3. **Real Estate and HOA Regulatory Bodies:**

- The Arizona Department of Real Estate oversees HOA compliance with state laws, including **A.R.S. § 33-1807**. Defendants' improper liens and discriminatory practices should be reported for regulatory review.

**4. Federal Fair Housing Authorities:**

- The **Fair Housing Act (42 U.S.C. § 3601 et seq.)** prohibits discrimination and retaliation in housing-related matters. Defendants' targeted harassment and discriminatory restrictions on Plaintiff violate these protections and should be reported to the U.S. Department of Housing and Urban Development (HUD).

**CONCLUSION**

The actions of the Defendants and their legal counsel demonstrate a calculated pattern of harassment, retaliation, and financial abuse, all of which have caused irreparable harm to Plaintiff Sandra Rodriguez and her family. Plaintiff has provided substantial evidence of misuse of HOA authority, retaliatory legal tactics, discriminatory policies, and financial extortion. These actions not only violate federal and state laws but necessitate immediate judicial intervention under well-established legal standards.

Defendants' conduct violates the *Fair Housing Act* (42 U.S.C. § 3601 et seq.), which prohibits discrimination and retaliation in housing, as affirmed in *Bloch v. Frischholz*, 587 F.3d 771 (7th Cir. 2009). Furthermore, Defendants' filing of improper liens directly contravenes A.R.S. § 33-420, which prohibits groundless liens filed in bad faith, while their discriminatory restrictions breach fiduciary duties under A.R.S. § 10-3830. Their repeated bad-faith litigation tactics violate Rule 11 of the Arizona Rules of Civil Procedure, which bars actions intended to harass or needlessly increase litigation costs. Additionally, the inflated assessments and financial coercion constitute deceptive practices under the *Arizona Consumer Fraud Act* (A.R.S. § 44-1521 et seq.).

Judicial precedent further supports Plaintiff's entitlement to relief. In *IB Property Holdings, LLC v. Rancho Del Mar Apartments, Ltd. P'ship*, 228 Ariz. 61 (App. 2011), courts recognized injunctive relief as appropriate when monetary damages are insufficient to prevent ongoing harm. Likewise, in *Shoen v. Shoen*, 167 Ariz. 58 (App. 1990), injunctive relief was deemed necessary to address irreparable harm. The Court also has a duty under the Arizona Judicial Code of Conduct,


particularly Canon 2 and Canon 3, to ensure fairness, uphold integrity, and prevent abuse of the judicial process.

Plaintiff's requests for relief, including an injunction against harassment, an order of protection, quashing of retaliatory judgements and liens, halting collections activities, and other remedies, are fully supported by these legal standards and necessary to prevent further harm. The Court's intervention is essential to uphold the rule of law, protect Plaintiff's rights, and prevent the continued misuse of judicial and HOA authority as tools for harassment and financial abuse.

Plaintiff has endured significant emotional trauma, financial instability, and the erosion of her civil rights. The harm inflicted by Defendants cannot be remedied by monetary damages alone, as it has created an unsafe and hostile environment for Plaintiff and her children. The ongoing financial coercion and retaliatory actions further exacerbate this harm, making immediate relief critical.

The Court must take immediate and decisive action to halt Defendants' retaliatory and harmful actions, restore justice, and uphold the rule of law. Quashing the judgment and liens, issuing the requested injunctions and orders of protection, halting collections activities, and referring the misconduct to regulatory bodies are essential to prevent further harm to Plaintiff and her family. Judicial intervention is not only justified but necessary to stop Defendants from weaponizing legal and HOA authority as tools of harassment, retaliation, and financial abuse. Plaintiff urges the Court to grant the requested relief to protect her rights and restore trust in the judicial process.

**Respectfully submitted** this 27th day of November, 2024.

A handwritten signature in black ink, appearing to read 'Sandra Rodrigues', with a long, sweeping horizontal line extending to the right.

Sandra Rodrigues, Pro Se Plaintiff