

IN THE COUNTY COURT, SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA

Nancy Perez,  
Plaintiff(s),

vs.

Suzanne C Spaulding,  
Brighton H Young,  
Defendant(s).

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CASE NO.: 25-006181-CO

**DEFENDANT'S RESPONSE TO EVICTION COMPLAINT**

Suzanne C Spaulding & Brighton H Young file this response to Plaintiff's Complaint, and alleges as follows:

**ANSWER**

Defendant, Suzanne C Spaulding & Brighton H Young, answers Plaintiff's complaint as follows:

1. Defendant admits the allegations in this paragraph.
2. Defendant denies the allegations in this paragraph. (Plaintiff is not the owner)
3. Defendant denies the allegations in this paragraph. (No copy of lease is attached)
4. Defendant denies the allegations in this paragraph. (Rent receipts for 14 months attached)
5. Defendant denies the allegations in this paragraph. (Notice & summons served on 7/11/25)

If I prevail, I intend to recover my attorney fees and court costs under Fla. Stat. 83.48 and 83.59.

**DEFENSES**

**Failure to Attach Lease**

Plaintiff failed to attach a copy of the lease to the complaint.

**Failure to Give Required Notice**

Plaintiff failed to give Defendant the required written notice prior to filing this eviction case.

**Lack of Standing**

Plaintiff lacks authority to evict. Nancy Perez is not the owner, and no documentation establishing her as property manager or agent was provided to Defendants

### **Retaliation**

Plaintiff filed this eviction action in retaliation for Defendant making a complaint to a government agency.

### **Illegal Self-Help Eviction Tactics**

Nancy engaged in illegal self-help eviction by fraudulently telling Duke Energy the building was vacant and being demolished to have meters removed, despite the building being neither condemned nor scheduled for demolition. She also twice removed digital locks, leaving residents unsafe, and made false representations to utilities, law enforcement, and the court without verifying facts or communicating with lawful tenants. Duke Energy now refuses to restore service until the owner contacts them.

### **Failure to Maintain Property**

The landlord abandoned the property entirely and did not make repairs, so we withheld our rent after sending written notice to the landlord.

### **Offset**

Defendant is entitled to an abatement of the rent claimed because of problems beginning on September 1, 2024 have made the property uninhabitable.

### **Response to police reports**

Defendants are the only legitimate tenants with a valid lease and utility account. Due to the owner's abandonment of the property, unauthorized squatters created electrical hazards, these people were subsequently removed by police. Despite being the sole remaining lawful occupants who have maintained the property, Defendants' electricity remains disconnected due to Plaintiff's false report to Duke Energy.

## **MOTION TO DISMISS**

Defendants move to dismiss based on:

- No valid grounds for eviction
- No rent owed
- Plaintiff lacks standing
- Improper notice procedure
- Incorrect eviction documents with wrong address and dates

WHEREFORE, Defendants request this Court:

1. Dismiss Plaintiff's complaint
2. Order restoration of utilities
3. Enjoin further harassment

Defendants reserve the right to obtain counsel and file a counterclaim for damages resulting from Plaintiff's illegal eviction practices.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have sent a true copy of the foregoing to the Plaintiff by way of

(x) email ( ) mail ( ) hand-delivery on July 18th, 2025.

Suzanne Spaulding

Signature of Suzanne C Spaulding

Brighton Young

Signature of Brighton H Young