# ANSWER TO SMALL CLAIMS

IN THE COUNTY COURT IN AND FOR Pinellas COUNTY, FLORIDA

Nancy Perez,

Plaintiff

V.

Brighton Heather Young,

Suzanne Carol Spaulding,

Defendant(s) Case number: 25-006181-CO

**ANSWER TO SMALL CLAIMS**

1. I agree as to the following allegations raised and, therefore, admit those allegations:

Defendant admits the allegation in paragraph 1 of the Complaint that this is an action to evict a tenant from real property located in Pinellas County, Florida.  
Defendant also admits the allegation in paragraph 3 of the Complaint in which the Defendant has possession of the property under an oral and written agreement to pay rent, which Plaintiff acknowledges as "N/A" (not applicable), and notes that Plaintiff did not attach a copy of any lease agreement referenced as Exhibit "A" to the Complaint.

1. I disagree as to the following allegations raised and, therefore, deny those issues:

Defendant denies the allegation in paragraph 2 of the Complaint. Plaintiff, Nancy Perez, does not own the subject property. The property is owned by Randell Walden, through Family International Home Builders LLC. Plaintiff has not provided any proof of ownership or documentation verifying authority as property manager. In fact, Plaintiff's submitted documents erroneously indicate that Suzanne Carol Spaulding and Defendant are being retained by Nancy Perez, who incorrectly represents herself as the landlord.  
Defendant denies the allegations in paragraph 4 of the Complaint. Defendant has never been a "squatter" as alleged, and the claim of non-payment of rent for two years is categorically false. Defendant possesses receipts documenting consistent rent payments covering a period of approximately eighteen (18) months.  
Defendant denies the allegation in paragraph 5 regarding service of the notice on July 10, 2025. Defendant did not receive the notice until approximately 4:30 p.m. on Friday, July 11, 2025.

1. I currently am unable to admit or deny the following due to lack of information:

1. Grounds for counterclaim or setoff:

The Plaintiff, Nancy Perez, knowingly filed false allegations in an attempt to wrongfully evict Defendant from the property. Plaintiff falsely represented herself as the owner and landlord despite clear ownership belonging to Randell Walden, through Family International Home Builders LLC. Plaintiff’s actions have caused Defendant unnecessary emotional distress, financial harm, and disruption. Plaintiff's false statements to the Court, labeling Defendant as a "squatter" who has failed to pay rent for two years, directly contradict documented evidence of consistent rent payments spanning at least eighteen (18) months. Additionally, the improper and inaccurate eviction filing by Plaintiff has harmed Defendant’s reputation, caused unnecessary expense in defending against false allegations, and disrupted Defendant’s peaceful enjoyment of their residence. Defendant seeks damages, court costs, and any applicable relief resulting from Plaintiff’s improper actions.

I certify that a copy of this document was ☒ mailed ☐ faxed and mailed ☒ e-mailed

☒ hand delivered to the person(s) listed below on {date} 07/16/2025.

**Other party or his/her attorney:**

Name: Not Represented By An Attorney

Address: 1855 Plunkett Street Unit 110

City, State, Zip: Hollywood, FL 33020

Fax Number:

Designated E-mail Address(es): nperez1982@gmail.com

I certify that a copy of this document was ☐ mailed ☐ faxed and mailed ☐ e-mailed

☐ hand delivered to the person(s) listed below on {date} .

**Other party or his/her attorney:**

Name:

Address:

City, State, Zip: ,

Fax Number:

Designated E-mail Address(es):

## I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this answer and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Signature: s/ Brighton Heather Young

Printed Name: Brighton Heather Young

Address: PO Box 10136

City, State, Zip: St Petersburg, FL 33733

Telephone Number: 479-276-3068

Fax Number:

Designated E-mail Address(es): bright.young@outlook.com

## IF A NONLAWYER HELPED YOU FILL OUT THIS FORM, HE/SHE MUST FILL IN THE BLANKS BELOW:

This form was completed with the assistance of:

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