

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN
AND FOR MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

23-19729 CA01

CASE NO.:

#401

ALEX MITCHELL, JERRY NURSE,
COLLEEN HENRY, ANTHONY
FORDE, VALERIE SUZETTE
JEAN-MARIE, MICHAEL MARCUS,
PLAINTIFFS,

-vs-

VERIFIED COMPLAINT

MIA AMOR MOTTLEY, RICHARD
CHELTENHAM, PATTERSON
CHELTENHAM, WAYNE CUMBERBATCH,
RALPH THORNE, RENALD HELLMAN,
BILLIE MILLER, HENRY FORDE, CHESLEY
BRYCE, TYRONE ESWITH, LINDSAY BOLDEN,
AUSTIN SHEPHERD, PETA LESS BARACE,
STEWART MOTTLEY, SANDRA MASON,
MARSDEN GIBSON, ELLIOTT MOTTLEY,
KEITH MAYERS, SAMANTHA CUMMINS,
MARK CUMMINS, DONNA BADD-AGARD,
LEND A BLACKMAN, PHILLIP NICHOLS,
FREDERICK SMITH, DEREK DANIEL,
DAVID COMMISSIONG, SALLY COMMISSIONG,
SHARON PARRIS, LENDA BLACK, CARLAN
BEST, RICHARD BYER, CHEALSEA BOYCE,
CHESTER SUE, DAVID THOMPSON, IVAN
JESSEMY, G. DENNIS CLARKE, ANDREW BREWSTER,
CARL CRISLOW, DAVID SIMMONS, DALE MARCHALL,
FLOYD WILLIAMS, GAIL GOLLOP, EDMUND HINKSON,
LLOYD SMITH, MURY BAIR, RONALD HELLMACK,
ADRIAN CUMMINGS, DAVID KING, EARNEST
JACKMAN, NIGEL BENNETT, MARVIN PATTERSON,
JENNIFER KING, FREUNDEL STUART, LYNETTE
EASTMOND, MICHAEL CARRINGTON, ADRIEL
BRAITHWAITE, LIZ THOMPSON, SHARON PARRIS,
VONDA PILE, C. LINDSAY BOLDEN, WILFRED ABRAHAMS,
VERIA DE PELIZA, GEREY PAYNE, KERRIE SYMONDS,
EDMUND HINKSON. MARIE MAC CORMACK, ALTAIR
SHEPHERD, MARK FORDE,
MAUREEN CRANE-SCOTT. HENRY FORDE,
SUZANNE BARKER-SMALL, PAMELA
BECKLES, CHRISTOPHER BLACKMAN, RONALD TOPPIN,
SINCLAIR HUTCHINSON, DIANE DOUGLIN, FLOYD
WILLIAMS, AND AVENEL YOLANDA HINSON-FORD,
LAURIE-ANN SMITH-BOVELL, CICELY PATRICIA CHASE,
AMIT KUMAR MANIBHAI PATEL, IVAN HUGH WALTERS
DENNIS HEADLEY, JACQUELINE CORNELIUS,
VERNION SMITH, CECIL McCARTHY, STEVEN LASHLEY,
FIONA JENNIFER HINDS, CALVIN HOPE, LESLIE FRANCIS

FILED FOR RECORD
CIVIL DIVISION #1180
2023 JUL 18 PM 12:54
CLERK OF THE CIRCUIT COURT
MIAMI-DADE COUNTY, FL

FILED FOR RECORD
CIVIL DIVISION #1180
2023 JUL 18 PM 12:54

FILED FOR RECORD
CIVIL DIVISION #1180

HAYNES, AVENEL YOLANDA HINKSON FORDE
; DEFENDANTS.

THE PLAINTIFFS, ALEX MITCHELL et al, SUE THE DEFENDANTS, MIA AMOR MOTTLEY et al, AND STATE:

1. This is an action for damages that exceeds the sum of Fifty Thousand and One (\$50,001.000) Dollars, and within the jurisdiction of this Court, and for Equitable Relief.
2. The Plaintiffs are citizens and nationals of BARBADOS, an independent republic in the Caribbean. and all are victims of an enterprise established to cheat them out of real property that they are entitled to by inheritance or through warranty deed.
3. The Defendants are current or former attorneys and counselors at law, currently or formerly admitted to the practice of law in BARBADOS.
4. The Defendants are engaged in an enterprise, the object of which was, and is, to defraud the Plaintiffs, and Others. out of real property, through probate fraud, forgery of instruments, misrepresentation of material fact, common law fraud, and other methods and means, all to the damage and detriment of the Plaintiffs.
5. The Defendants are engaged in a pattern of racketeering activity, designed and intended to deprive the Plaintiffs of their real and personal rights and privileges.
6. The Defendants have transferred the proceeds of their racketeering activities into the State of Florida, into Miami-Dade County, and elsewhere in the State, by purchasing real and personal property with those funds. to conceal it from the Plaintiffs.
7. The Defendants are the Beneficial Owners of said real and personal property, some of which is held in the names of corporations and third parties.
8. The Defendants formed an association or informal relationship, to achieve a common goal, depriving the Plaintiffs of their inheritance, to wit: real and personal property.
9. The enterprise created and established by the Defendants has been in continuous existence for at least the past fifty years, and continues to exist as of the date of filing of this action.

The Plaintiffs have suffered actual damages in an amount within the jurisdiction of this Court, due to the

aforesaid conduct of the Defendants.

WHEREFORE, THE PLAINTIFFS PRAY AS FOLLOWS:

That this Court take jurisdiction over this cause, and the parties thereto.

A. That this Court award money damages to the Plaintiffs in an amount in excess of \$50,001.00. and within The Jurisdiction of this Court.

B. That this Court order Civil Forfeiture of all real and tangible personal property of the Defendants, located in the State of Florida, acquired by the Defendants shown to have been purchased with assets of the Plaintiffs, pursuant to the provisions of Chapter 895, Florida Statutes.

C. That this Court award such additional equitable relief to the Plaintiffs as it deems fair and appropriate.

Respectfully submitted,

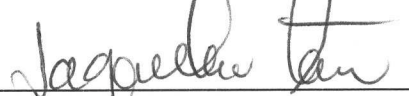
ALEX MITCHELL, Plaintiff Pro Se
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By: ALEX MITCHELL

STATE OF FLORIDA) SS:
COUNTY OF MIAMI-DADE)

BEFORE ME, the undersigned Notary Public of Florida. Personally appeared ALEX MITCHELL, who produced driver's License 599 228 451 as proof of identity, and who stated that he signed the aforesaid VERIFIED COMPLAINT for the purposes therein intended.

Dated this 18 day of July, 2023, at Miami, Miami-Dade County, Florida.


NOTARY PUBLIC, STATE OF FLORIDA
At large My commission expires: 04/18/24

