

IN THE COUNTY COURT, IN AND FOR
DUVAL COUNTY, FLORIDA

CASE NUMBER:
DIVISION:

APARTMENT MANAGEMENT
CONSULTANTS LLC AS MANAGER
FOR UNIVERSITY PLAZA APTS.,

Plaintiff,

-VS-

JA'BRAYJIA ROBINSON AKA
JAH'BRAYJIA ROBINSON,

Defendant(s).

COMPLAINT TO EVICT TENANT

The Plaintiff sues the Defendant(s) and alleges:

1. This is an action to evict a person from real property in Duval County, Florida.
2. Plaintiff is the Agent/Manager of the owner and acting on said person's behalf of the property that is the subject of this action which is located at:

715 VENUS MARS COURT #C
JACKSONVILLE, FLORIDA, 32209

Further, see *Arcos v. Laramar, Case Number 2019-AP-10, in Duval County, Florida*

3. The Defendant(s) has/have possession of said property under an oral agreement to pay rent of \$912, monthly (which may or may not include concessions given), on the first day of each month.
4. The Defendant(s) failed to recertify in order to receive assistance and thus defaulted in their rental obligations.
5. The Plaintiff served the Defendant(s) with a notice on 2/22/2024 to pay rent or deliver possession of said property; however, Defendant(s) has/have failed to do either.
6. The Plaintiff files this complaint with permission of the owner of the property.
7. The Plaintiff has obligated itself to pay their attorney a reasonable fee for the bringing of this action. Both Florida Law and the lease agreement require that the tenants/Defendant(s) reimburse the Plaintiff for attorney fees and Court costs expended in this matter.

WHEREFORE, Plaintiff demands judgment for possession of the property, reimbursement for attorney fees and court costs and for such other further relief as the Court may deem appropriate.

Is\ Dale G. Westling, Sr.
Dale G. Westling Sr., PA
Florida Bar #: 203262
437 East Monroe Street, Suite 300
Jacksonville, Florida 32202
(904) 356-2341
pleadings@dalewestling.com

30-DAY NOTICE FOR NONPAYMENT OF RENT

TO: Ja' Braynia Robinson
Tenant's Name(s)

DATE: February 22, 2024

715 Venus Mars Ct. Apt. C
Tenant's Street Address

Jacksonville, Fl. 32209
City, County, State, and Zip

AND ALL OTHERS IN POSSESSION

Pursuant to Section 83.56(3) of the Florida Statutes and federal regulation, you are hereby notified that you are indebted to the landlord in the sum of \$ 931.00 for the rent and use of the premises described above, now occupied by you, and that the landlord demands payment of the rent or possession of the premises within thirty days from the date of delivery of this notice which includes 5 mailing days as required by Florida law, to wit: on or before March 23, 2024.

If you have been adversely affected by the COVID-19 emergency, you must inform us within ten (10) days. If you do not inform us, we will presume you have not been adversely affected by the COVID-19 emergency. You have ten (10) days within which to discuss the proposed termination of your tenancy with the landlord or request a reasonable accommodation due to a disability to participate in the informal hearing process. The ten (10) day period will begin on the date this notice was hand-delivered to your unit or the day after the date this notice was mailed to you, whichever is later. If you request a meeting, the landlord agrees to discuss the proposed termination with you. You have the right to request a reasonable accommodation to participate in the hearing process if necessary. The time in this notice runs concurrently with the requirements set forth in the Florida Statutes including mailing days. If you remain in the dwelling after the expiration date of this notice and have not paid the rent due, the termination may be enforced only through the landlord bringing a judicial action, at which time you may present a defense. If suit is filed against you, you may be liable to the landlord for court costs and attorney's fees. If the lease violations detailed herein are the result of domestic violence, dating violence, sexual assault or stalking, we want to ensure that you understand your protections under the Violence Against Women Act ("VAWA"). VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation. HUD's notice of occupancy rights under VAWA and HUD's certification of domestic violence, dating violence, sexual assault or stalking and alternate documentation (form HUD-5382) are attached to this notice. If this is applicable to you and you wish to exercise your rights under VAWA, you may do so by completing and submitting the certification so it is received in the management office no later than 14 business days from the date of your receipt of this notice. If you remain in the dwelling after the expiration date of this notice and have not paid the rent due, the termination may be enforced only through the landlord bringing a judicial action, at which time you may present a defense. If suit is filed against you, you may be liable to the landlord for court costs and attorney's fees.

Because of the global COVID-19 pandemic, you may be eligible for temporary protection from eviction under Federal law. Learn the steps you should take now: visit www.cfpb.gov/eviction or call a housing counselor at 800-569-4287.

By: Kelli McFarlane
Signature

Property Manager
Title

University Plaza Apartments
Name of Apartment Community

719 Venus Mars Court
Address

(904) 354-0733
Telephone Number

Jacksonville, FL 32209
City, State, Zip

Certification Of Delivery
[For Landlord's Use Only]

I HEREBY CERTIFY that a true copy of this notice was furnished to the tenant(s) at the address listed above by the following method(s):

- Mailing a copy by first class mail on Feb. 22, 2024 and
 Delivering a copy of this notice to any adult person present at the tenant's unit or placing a copy of this notice ___ under, ___ through, or affixed to the door of the tenant's unit.

Per HUD guidelines, service of this notice is deemed effective once the notice has been both mailed and hand-delivered to the tenant's unit.

Mailed/delivered by: Kelli McFarlane Date: 2/22/24 Time: 1:30 PM

Form provided in blank by the MGF Law Firm PA.

7/22/2020