

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT IN AND FOR PALM  
BEACH COUNTY, FLORIDA

IN RE: THE MARRIAGE OF

JULIA M. GONZALEZ,

PETITIONER-MOVANT,

,

CASE NO. 502010DR003810XXXXSB/ Div. FY

V.

**VERIFIED PETITION - MOTION FOR  
MANDATORY DISQUALIFICATION OF  
JUDGE DAVID E. FRENCH:**

LLOYD G. WICKBOLDT,

RESPONDENT-DEFENDANT.

\_\_\_\_\_/

**VERIFIED SWORN EMERGENCY PETITION AND AFFIDAVIT OF JULIA M.  
GONZALEZ FOR IMMEDIATE MANDATORY DISQUALIFICATION OF CIRCUIT  
JUDGE DAVID E. FRENCH**

COMES NOW JULIA M. GONZALEZ, Petitioner and movant who files under information and belief this Verified Emergency Petition and Affidavit for Immediate Mandatory Disqualification of Judge David E. French, pursuant to Fla R. Admin P. 2.330 and section 38.10, Florida Statutes, for the following grounds and reasons:

1. This rule applies to county and circuit judges in all matters in all divisions of Court.
2. Judge David French is a Circuit judge in the 15th Judicial Circuit.
3. Petitioner ,a party to the case, moves for mandatory disqualification and to otherwise disqualify Trial Judge David French for mandatory grounds provided by the Florida rules, statutes, laws, Florida Code of Judicial Conduct and US Constitution and Florida Constitution.
4. Judge David French has violated the following Judicial Canons,including but not limited to,
  - a. Canon one- A judge Shall Uphold the integrity and independence of the Judiciary

- b. Canon two- A Judge Shall avoid Impropriety and the Appearance of Impropriety In all of the Judge's Activities.
  - c. Canon three- A Judge Shall Perform the Duties of Judicial Office Impartially and Diligently .
  - d. CANON 3E(1) - ...A judge shall disqualify himself or herself in a proceeding in which the judge's impartiality might reasonably be questioned.
  - e. CANON 3E(1)(a) - ...the judge has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of disputed evidentiary facts concerning the proceeding.
5. This motion and petition is legally sufficient and timely.
  6. Judge David French is acting, has been acting and threatening to continue to act in excess and outside of his jurisdiction by illegally denying me First Amendment rights of expression, 5th and 14th Amendment due process including but not limited to the right to have counsel of my own choosing.
  7. Judge David French has consistently deprived my basic Constitutional right to be heard in Court. He has obstructed and denied my Due Process. He has been Prejudiced against me and has sheltered opposing counsel Anthony Aragona and his client Lloyd G.Wickboldt.  
  
Judge David French has openly and also under the color of Law,denied me and obstructed my Due process, denied me my First and Fourteenth amendment rights. Consistently and maliciously ignoring my pleadings , witnesses testimony and factual evidence in my favor to prove my case.
  8. Rule 4-1.16 of the Rules for CLIENT-LAWYER RELATIONSHIP DECLINING OR TERMINATING REPRESENTATION provides in part:

“(a) When Lawyer Must Decline or Terminate Representation. Except as stated in subdivision (c), a lawyer shall not represent a client or, where representation has commenced, shall withdraw from the representation of a client if:

- (1) the representation will result in violation of the Rules of Professional Conduct or law;
- (3) the lawyer is discharged;

### **Discharge**

**A client has a right to discharge a lawyer at any time, with or without cause, subject to liability for payment for the lawyer's services.** Where future dispute about the withdrawal may be anticipated, it may be advisable to prepare a written statement reciting the circumstances. “

9. The Florida Supreme Court has made the issue of client’s rights and attorney’s fees one of exceptional importance and clearly implicates the operations of the State’s justice system.
10. The Florida Supreme Court has consistently upheld a client’s right to discharge counsel at any time, with or without cause, finding, “The attorney-client relationship is one of special trust and confidence. The client must rely entirely on the good faith efforts of the attorney in representing his interests. This reliance requires that the client have complete confidence in the integrity and ability of the attorney and that absolute fairness and candor characterize all dealings between them. These considerations dictate that clients be given greater freedom to change legal representatives than might be tolerated in other employment relationships. We approve the philosophy that there is an overriding need to allow clients freedom to substitute attorneys without economic penalty as a means of accomplishing the broad objective of fostering public confidence in the legal profession.” See, ROSENBERG v. LEVIN, 409 So.2d 1016 (1982).

11. Judge David E. French has exceeded his jurisdiction and acted in a biased and prejudiced manner creating a reasonable fear that I can not get a fair trial by denying my fundamental right to be heard regarding the counsel of my choice, striking my prior applications to discharge my former attorney Craig Derr while using the Court system as a weapon to illegally coerce me to give away rights and property by repeated threats against my liberty threatening incarceration and action by law enforcement to arrest me to coerce signatures on documents all in violation of fundamental US Constitutional rights and in violation of Florida laws, rules and statutes.
12. Said acts have occurred over an extended period of time including but not limited to June 2, 2016 and including up to June 14, 2016 by the Contempt Order herein as Exhibit 1 with threats of incarceration from the involved attorneys continuing to the present making this motion timely and sufficient.
13. I am a US Citizen and resident of Florida and under the protection of Florida statutes and laws as an abuse victim under the ACP Address Confidentiality Program administered by the State of Florida with all my registrations being current and up to date and yet Judge David French has violated said rights by the repeated conduct herein and upholding illegal Orders herein.
14. Judge David E. French is furthering this abuse of discretion acting illegally in excess of jurisdiction by further wrongfully and illegally attempting to violate my rights under the Florida Constitution Homestead Act and using my attorney Craig Derr who has been discharged by myself to further communications to violate these rights.
15. In addition to 2 separate filings by myself to Discharge attorney Derr, there is also a motion by attorney Derr himself to withdraw which has been improperly denied by Judge David French abusing his discretion and acting in a manner that is not only against the law but prejudiced and

biased and creating a reasonable fear that I can not receive a fair trial and thus Judge French must be Disqualified. See, Exhibit 2, Exhibit 3 motions for Discharge and Withdrawal.

16. Said biased, prejudiced and illegal conduct by Judge French has further created such a distorted state of affairs with attorney Dear that I have lost rights certain rights on appeal.
17. I have valid and meritorious rights on all claims herein and am entitled to retain the attorney of my choosing to pursue my claims properly according to law to undo the manifest injustice of financial and property awards issued without due process after being married for less than 2.5 years to a man later determined to have been so abusive as to have me qualified under the State's Address Confidentiality Program.
18. Judge David E. French has violated Statutes related to, including but not limited to;
  - a. Fraud by the Court and Fraud in the Court.
  - b. Obstruction of Justice through Denial of Due Process.
  - c. Inability to Obtain a Fair Trial and Due Process.
19. There have been proceedings in this case where it has been proven that I have not received proper notice and communications from my former attorney as well as multiple occasions where proper evidence and testimony has repeatedly been denied illegally in an abuse of discretion manner acting prejudicially and with bias again creating the reasonable fear that I will not receive a fair trial from Judge David E. French.
20. The illegally threats of incarceration continue despite the fact that attorney Dearth himself has advised me in writing as of June 14, 2016 that Judge David French has in fact issued an Order Discharging attorney Dearth although I have not received a copy as of yet, where attorney Dear notified me as follows:

From: craig dearr  
Sent: 6/14/2016 5:05 PM

To: Anthony Aragona; Kelly Huerta  
Subject: RE: Hearing on Motion to Appoint Receiver  
Mr. Aragona,

Judge French signed an order permitting me to withdraw from this case. You should have received a copy last week as I did. I am attaching a copy for your reference. You should try to coordinate this hearing with Ms. Gonzalez until new counsel appears for her.

Craig R. Derr, Esq.  
One Datran Center ~ Suite 1701  
9100 South Dadeland Boulevard  
Miami, Florida 33156-7817  
Phone: 305-670-1237  
Fax: 305-670-1238  
craig@dpmiamilaw.com  
[www.dpmiamilaw.com](http://www.dpmiamilaw.com)

21. The following email shows Mr. Derr knows that he was Discharged and was trying to comply with the Rules of Discharge as follows:

Subject: RE: Wickboldt v. Gonzalez  
Date: Mon, 23 May 2016 10:18:16 -0400  
From: craig@dpmiamilaw.com  
To: anthony.aragona@att.net; kelly@dpmiamilaw.com

Mr. Aragona,

Would you please tell me what things I have filed that you have not received? There has been nothing which I have filed that has not been properly served upon you as far as I am aware, including the fact that all documents are filed through the court's eportal for filing, which automatically serves documents on you. I have been discharged as Ms. Gonzalez' attorney, I cannot represent her once discharged. Rules of Professional Conduct 4-1.16(a)(3) specifically states "...a lawyer shall not represent a client, or where representation has commenced, shall withdraw from the representation of a client if...(3) the lawyer is discharged;". Of course I have to request permission from the court to withdraw, which I have done. I submitted the order because I was discharged. As with the other order in the civil case, I did not provide in the order for any delay to any proceeding, nor did I provide that she had any particular amount of time to obtain new counsel, just her contact information until she retains new counsel (if she does). Obviously you can object to whatever you want to object to, but to accuse me of some sort of conspiracy or imply an impropriety on my part is not only

false but completely unprofessional. My client has discharged me. I am required by the rules to ask the court to withdraw. Judge French's JA indicated that since I had been discharged I should submit a proposed order which I mailed to the judge but emailed to you so that you would have the order in advance of the judge receiving it. Other than not mentioning a hearing (as in the other case), this order is the same as the order I submitted in the civil case, which has already been entered.

*Craig R. Darr, Esq.*

One Datran Center ~ Suite 1701  
9100 South Dadeland Boulevard  
Miami, Florida 33156-7817  
Phone: 305-670-1237  
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This email may contain legally privileged and confidential information intended only for the use of the addressee(s) named above. If you are not the intended recipient of this email, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this email is strictly prohibited. If you have received this email in error, please immediately notify us by telephone (305-670-1237) so that we can arrange to have the original returned to us or forwarded to the intended recipient. Thank You.

22. Said illegal conduct by Judge French continues despite the fact that on June 9, 2016 Judge Richard L. Oftedal issued an Order on such date Discharging attorney Darr from the related and companion case where again I had been denied due process procedures before the Court. See Exhibit 4.
23. Other background to support the motion has been raised in prior applications showing Judge French, regardless of the unlimited proof provided; to show evidence that Lloyd Wickboldt is in fact an abuser, a Narcissist; that not only abused ME physically, psychologically and emotionally and should have been prosecuted by the law but also he has a record of Domestic abuse, of multiple restraining orders and has even been in jail for Domestic violence before in another State. Judge French has consistently has made negative recommendations" in my case, without even hearing me on the stand.

24. Further that an ultimate biased and prejudiced action from Judge French occurred when he did not even acknowledge my Motion for Continuance of Trial, after he had dismissed my attorney at her request, only a few weeks before Trial. He only responded verbally when I after many times of trying to reach him was able to verbally ask him and He only responded “your Motion is denied” with no explanation.
25. Further, Judge French has repeatedly spoken to me only in rude and condescending tone and manners throughout many of the proceedings which has been witnessed by many.
26. Rule 2.330 Grounds.

(f) Determination - Initial Motion.

The judge against whom an initial motion to disqualify under subdivision (d)(1) is directed shall determine only the legal sufficiency of the motion and shall not pass on the truth of the facts alleged. If the motion is legally sufficient, the judge shall immediately enter an order granting disqualification and proceed no further in the action. If any motion is legally insufficient, an order denying the motion shall immediately be entered. No other reason for denial shall be stated, and an order of denial shall not take issue with the motion.

27. Petitioner states that the Motion is legally sufficient under Rule 2.330 as it fully complies with this code and whether Petitioner has filed a legally sufficient pleading would not negate the fact that Judge David E. French has to mandatorily disqualify under Judicial Canons, Attorney Conduct Codes and Law as stated herein.

Florida Statutes 38.10

Disqualification of judge for prejudice; application; affidavits; etc.—

Whenever a party to any action or proceeding makes and files an affidavit stating fear that he or she will not receive a fair trial in the court where the suit is pending on account of the prejudice of the judge of that court against the applicant or in favor of the adverse party, the judge shall proceed no further, but another judge shall be designated in the manner prescribed by the laws of this state for the substitution of judges for the trial of causes in which the presiding judge is disqualified. Every such affidavit shall state the facts and the reasons for the belief that any such bias or prejudice exists and shall be accompanied by a certificate of counsel of record that such affidavit and application are made in good faith.



28. Petitioner seeks that upon Disqualification of Judge French, that all factual or legal rulings be vacated by the successor judge due to alleged criminal acts and civil torts against Petitioner. Furthermore Petitioner seeks a replacement Judge that is not from the 15 circuit court in Delray Beach, nor Magistrate.

WHEREFORE,

Petitioner Julie M. Gonzalez respectfully prays for an immediate Order of mandatory Disqualification of Judge David E. French from all matters herein and such all prior Orders, Decisions and Judgements being void herein and for such other and further relief as to this Court may be just and proper. Any denial of said motion as legally insufficient shall provide a full and specific written determination of the reasons why such motion is claimed insufficient.

“Under penalties of perjury, I declare that I have read the foregoing ‘VERIFIED SWORN EMERGENCY PETITION AND AFFIDAVIT OF JULIA M. GONZALEZ FOR IMMEDIATE MANDATORY DISQUALIFICATION OF CIRCUIT JUDGE DAVID E. FRENCH’ and that the facts stated in it are true to the best of my knowledge and belief.”

Dated this 24th day of June, 2016

Respectfully Submitted,

**/s/ Julie M. Gonzalez**

Julie M. Gonzalez

PO 8212911

Pembroke Pines, FL 33082

954-245-4653

[juliegonzalez64@hotmail.com](mailto:juliegonzalez64@hotmail.com)

**CERTIFICATE OF SERVICE**

Petitioner does hereby certify that the foregoing Petition was served on all parties below  
by e-file with the clerk of the court this 24th day of June, 2016.

Craig Dearr  
9100 South Dadeland Boulevard  
Suite 1701  
Miami, Florida 33156-7817  
305-670-1237  
305-670-1238 fax  
[craig@dpmiamilaw.com](mailto:craig@dpmiamilaw.com)  
[kelly@dpmiamilaw.com](mailto:kelly@dpmiamilaw.com)  
[www.dpmiamilaw.com](http://www.dpmiamilaw.com)

Anthony J. Aragona, III  
Anthony J. Aragona III, P.A.  
1036 Grove Park Circle  
Boynton Beach, Florida 33436  
Tel: (561) 649-1790  
Fax: (561) 649-6767  
[anthony.aragona@att.net](mailto:anthony.aragona@att.net)  
[www.anthonyaragona.com](http://www.anthonyaragona.com)

**/s/ Julie M. Gonzalez**  
Julie M. Gonzalez  
PO 8212911  
Pembroke Pines, FL 33082  
954-245-4653  
[juliegonzalez64@hotmail.com](mailto:juliegonzalez64@hotmail.com)

EXHIBIT 1 - June 14th 2016 Contempt Order

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA**

IN RE: The Marriage of

**LLOYD G. WICKBOLDT,**

Petitioner,

**CASE NO. 502010DR003810XXXXSB/ Div. FY**

and

**JULIE M. GONZALEZ,**

Respondent.

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**ORDER OF CIVIL CONTEMPT**

**THIS CAUSE** came before the Court on June 7, 2016, upon the Court's Order to Show Cause entered May 13, 2016 (DE 259) and the undersigned Judge, having heard argument of counsel and testimony of Respondent, Julie M. Gonzalez, and being otherwise fully advised in the premises herein, it is,

**ORDERED AND ADJUDGED** as follows:

1. Petitioner's *ore tenus* Motion to Strike Respondent's Amended Residence and Homestead Affidavit (DE 275) is GRANTED and the Affidavit is hereby stricken. Respondent has been instructed by the Court both in its Order of May 18, 2016 and verbally that Respondent has legal counsel and shall not file anything with the Court on her own.

2. On May 10, 2016, Petitioner filed a Motion for an Order to Show Cause Why Defendant Should Not Be Held in Contempt, Sanctions and Enforcement of Judgment (DE 261) with an Affidavit of Petitioner's attorney setting forth Respondent's non-compliance with the Final Judgment of Dissolution (DE 181) and this Court's Order of May 2, 2016 (DE 258). The

Court entered the Order to Show Cause on May 13, 2016 (DE 259) setting this hearing for June 7, 2016.

3. Respondent, Julie Gonzalez is hereby adjudged to be in indirect civil contempt of Court for willfully failing to comply with the Final Judgment of Dissolution (DE 181) and this Court's Order of May 3, 2016 (DE 258). The Court finds that Respondent has not complied with Paragraph 9 of the Final Judgment of Dissolution, and this Court's Order of May 3, 2016 with regard to the sale of the Miramar property, located at 17103 SW 39<sup>th</sup> Court, Miramar, Florida 33027 ("Property"). Based upon Respondent's own testimony, her non-compliance has been willful and deliberate, and Respondent further testified that she will refuse to sign any papers in furtherance of completing the sale of the Miramar property, including the Listing Contract with the Court-appointed Realtor, David Rose, presented to her in Court by Petitioner's counsel.

4. Respondent shall sign the Listing Contract presented to her in Court by Petitioner's attorney within 24 hours of the conclusion of this hearing, by 12:00 p.m. on June 8, 2016. If the Respondent fails to properly execute the Listing Agreement, counsel for the Petitioner may file an Affidavit of Non-compliance. Upon receipt of the Affidavit of Non-compliance, the Court will review the Affidavit and the court file, and, under the Court's discretion, may issue a Writ of Bodily Attachment for the arrest and incarceration of Julie M. Gonzalez. If a Writ of Bodily Attachment is issued, Julie M. Gonzalez shall be taken into custody by the Sheriff of Palm Beach or Broward counties, and shall be confined in the county jail until such time as she purges herself of contempt by properly and legally executing the Listing Agreement, and serving the signed Listing Agreement upon counsel for the Petitioner, and filing with the Court.

5. Respondent shall thereafter fully comply with the Final Judgment of Dissolution and shall not hinder in any manner the sale of the Property, including allowing access to the Property for inspection by an appraiser, an inspector, the Court-appointed realtor, prospective purchasers, the Court appointed Receiver, and any other persons reasonably necessary to facilitate and finalize the sale of the Property with at least 3 hours' notice of the need to enter the Property. Respondent shall keep the Property clean and ready to show to prospective purchasers, and shall protect and preserve the value of the Property prior to sale. Respondent shall sign a Purchase Contract with purchasers who offer the appraised value of the Property or more, as determined by the appraisal, or a lesser amount if acceptable to Respondent. If the Respondent is not in full compliance with allowing access to the Property and executing such documents as necessary to finalize and close the sale of the Property, counsel for the Petitioner may file an Affidavit of Non-compliance. Upon receipt of the Affidavit of Non-compliance, the Court will review the Affidavit and the court file, and, under the Court's discretion, may issue a Writ of Bodily Attachment for the arrest and incarceration of Julie M. Gonzalez, or other relief. If a Writ of Bodily Attachment is issued, Julie M. Gonzalez shall be taken into custody by the Sheriff of Palm Beach or Broward counties, and shall be confined in the county jail until such time as she purges herself of contempt as directed by this Court.

6. The Court shall appoint a Receiver to facilitate, oversee and consummate the sale of the Property, under a separate Order, with the costs and fees incurred by the Receiver payable by Respondent, at closing, from Respondent's portion of the closing proceeds

7. Respondent shall pay Petitioner's attorneys' fees for the preparation for and attendance at the June 7, 2016 hearing, in the amount of \$1,400.00 (4 hours at \$350 per hour). If this amount is not paid to Petitioner's attorney, Anthony J. Aragona, III, prior to the closing of


the sale of the Property, any amounts outstanding shall be paid from Respondent's portion of the closing proceeds at closing.

8. It is further ORDERED AND ADJUDGED that this Court retains jurisdiction to tax attorneys' fees and costs and to enter such orders as are proper including a Writ of Bodily Attachment for the arrest of Respondent, Julie M. Gonzalez.

**NOTICE TO RESPONDENT: FAILURE TO COMPLY WITH THIS ORDER MAY RESULT IN THE COURT ISSUING A WRIT OF BODILY ATTACHMENT FOR YOUR ARREST. IF YOU ARE ARRESTED, YOU MAY BE HELD IN JAIL UP TO 48 HOURS BEFORE A HEARING IS HELD.**

DONE and ORDERED in Chambers at Palm Beach County, Florida this 14 day of

June, 2016.

  
DAVID E. FRENCH  
CIRCUIT COURT JUDGE

Copies furnished to:

Anthony J. Aragona, III, Esq., ([anthony.aragona@att.net](mailto:anthony.aragona@att.net)), 1036 Grove Park Cir., Boynton Beach, FL 33436

Craig R. Dearr, Esq., Dearr Perdigon, ([service@dplawmiami.com](mailto:service@dplawmiami.com)), One Dattran Center, Suite 1701, 9100 South Dadeland Blvd., Miami, FL 33456

Julie M. Gonzalez, ([juliegonzalez64@hotmail.com](mailto:juliegonzalez64@hotmail.com)), PO Box 821911, Pembroke Pines, FL 33082

EXHIBIT 2 - Prior Motions for Discharge



IN THE CIRCUIT OF THE FIFTEENTH JUDICIAL CIRCUIT,  
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE # 2013 CA 006759 XXXX  
M.B. AA

UNIFIED FAMILY COURT

CASE NO: 502010D003810 LSB/DIV/FY  
DIVISION: FY

IN RE:

Alysa G Wickbrot  
Petitioner,

and

Julie M Gonzalez  
Respondent.

2016 MAY 23 PM 3:50  
JULIE M GONZALEZ  
SOUTH BEACH, FLORIDA

**MOTION FOR:** Amend Motion to Disqualify

I, (print your name) Julie M Gonzalez, the [check one]  Petitioner  
 Respondent, in the case am requesting the following Motion:

[ the appropriate motion(s):]

- Continue the hearing on (matter being heard) JUDGE DAVID French  
(date) \_\_\_\_\_ (time) \_\_\_\_\_ before Judge/Commissioner \_\_\_\_\_
- Dismiss (state action) \_\_\_\_\_
- Vacate the Court's Order which has been filed by the clerk as docket # \_\_\_\_\_
- Rehearing (check all that apply) of  Paternity,  Contempt,  Commitment.
- Waive Parenting/Mediation Requirements(s) for \_\_\_\_\_
- Other \_\_\_\_\_

Amended Motion to Disqualify  
JUDGE DAVID French

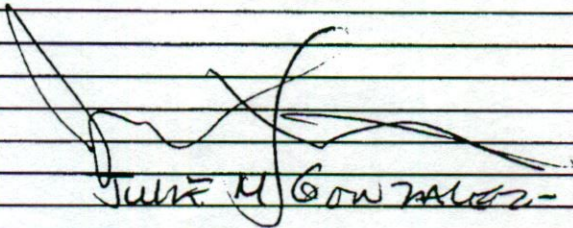
Comes Now Julie M Gonzalez and files under  
information and belief this petition and affidavit  
for the disqualification of JUDGE DAVID French - pursuant  
to Florida R. Admin P. 2.330 and Section 3810 Florida  
Statutes for the following grounds and reasons:

SEE ATTACHED Amended Motion For Disqualification  
of JUDGE DAVID French:

(4) Pages Attached Julie M Gonzalez

The following facts support the motion(s) checked above:

SEE ATTACHED Amended Motion For  
Disqualification of Judge David French.



JULIE M. GONZALEZ

4 Pages ATTACHED

I HEREBY CERTIFY that a copy of this Motion has been mailed on (date) 5/23/2016, by regular mail , certified mail , hand delivered , e-mailed  served to \_\_\_\_\_

Name of other party Wayne G. Wickboldt  
Address \_\_\_\_\_

and to: Attorney (if any) ANTHONY ANGLONA  
Address 5097 SANCENE CIRCLE  
LAKE WORTH, FL 33463

Sign your name JULIE M. GONZALEZ

Print your name \_\_\_\_\_  
Address PO Box 821911  
Pembroke Pines FL 33082  
Telephone (AU) 245-4653  
E-mail Address(es): \_\_\_\_\_

IF A NON-LAWYER HELPED YOU FILL OUT THIS FORM, THEY MUST FILL IN THE BLANKS BELOW:

I, (name of non-lawyer) \_\_\_\_\_, a non-lawyer, located at (street) \_\_\_\_\_ (city) \_\_\_\_\_ (state) \_\_\_\_\_, (phone) \_\_\_\_\_, helped {name} \_\_\_\_\_, who is the (check one)  petitioner or  respondent, fill out this form.

Standard Motion

Form 425 (rev. 08/2008)

Page 1

Amended Filing 05/19/2016. Case # 502010DR003810XXXXSB/ DIV FY

In the Circuit Court of the fifteen Judicial Circuit in and for Palm Beach County, Florida.

Lloyd G. Wickboldt

V.

Julie M. Gonzalez

Case # 502010DR003810XXXXsb/ Div FY

Defendant.

Other Applicable related cases this Disqualification of Judge David French Should apply to:

- \* CASE # 502010DR3810XXXXSB/DIVFY
- \* Case # 2013CA006759XXXXMBAA- Julie M. Gonzalez

### Amended Motion for Immediate DISQUALIFICATION of Judge David French

Comes now Julie M. Gonzalez( Petitioner) and files under information and belief this Petition and Affidavit for Immediate Disqualification of Judge David French, Pursuant to Fla R. Admin P. 2.330 and section 38.10, Florida Statutes, for the following grounds and reasons:

#### Rule 2.330 (a) Application .

This rule applies only to county and circuit judges in all matters in all divisions of Court.

- 1- Judge David French is a Circuit judge in the 15<sup>th</sup> Judicial Circuit Probate Division
- 2- Petitioner, a party to the case moves for mandatory disqualification and to otherwise disqualify trial judge David French provided by rules, statutes and by the code of Judicial Conduct.

Judge David French has violated the following Judicial Canons, including but not limited to,

- a- **Canon one-** A judge Shall Uphold the integrity and independence of the Judiciary
- b- **Canon two-** A Judge Shall avoid Impropriety and the Appearance of Impropriety in all of the Judge's Activities.
- c- **Canon three-** A Judge Shall Perform the Duties of Judicial Office IMPARTIALLY and Diligently.

Judge David French has violated Statutes related to, including but not limited to;

Fraud by the Court. Fraud in the Court. Obstruction of Justice through Denial of Due Process. Prejudice. Aiding and Abetting and more.

Judge David French has consistently deprived my basic Constitutional right to be heard in Court. He has obstructed and denied my Due Process. He has been Prejudiced against me and has sheltered opposing council Anthony Aragona and his client Lloyd G. Wickboldt.

Judge David French, has openly and also under the color of Law, denied me and obstructed my Due process, denied me my First and Fourteen amendment rights. Consistently and maliciously ignoring my

Amended Motion to Disqualify Page 1

pleadings, witnesses testimony and factual evidence in my favor to prove my case. Judge French, Regardless of unlimited prove to show, first, to prove my case; to show evidence that Lloyd Wickboldt is in fact an abuser, a Narcissist; that not only abused ME physically, psychologically and emotional and should have been prosecuted by the law but also he has a record of Domestic abuse, of multiple restraining orders and has even been in jail for Domestic violence before in another State. Judge French has consistently has made negative "recommendations" in my case, without even hearing me on the stand. One of his favorite actions after his ruling is to have me attend a follow up Hearing with a General Magistrate, who knows nothing of the case and this Magistrate only signs His order against me. Again without even hearing me, without even knowing anything else contrary to my ex husband's and his attorney false allegations against me. This case is so disturbing to Justice, that even for me, who is experiencing these incredible acts of deception and injustice and corruption in a Court of Law, is hard to believe; I am in shock and despair for such disregard to decency and Justice.

Please read Motion from March of 2013. Where I, Petitioner, requested the return of her personal property stolen by husband Lloyd G. Wickboldt. Petitioner also asked the court for the legal use of the car Petitioner was driving since vehicle was purchased months before the marriage and given to Petitioner as a wedding gift ( even though Petitioner had given her own car as a deposit for the new car) Petitioner wanting to help husband to be, who had no credit history after filing for bankruptcy 3 years earlier. ( Petitioner had been led to believe at the time, it was 5 years earlier) the car was put under husband's name; husband had also contributed with a cash gift towards the purchase. Petitioner always drove this car, to work, for pleasure and it was kept in my garage of my own home where I lived before the marriage, as agreed with future husband. Nothing was ever mentioned or discussed about future husband having any claims in this car. Otherwise I would Not have given my car as a down payment for a car that it was not meant to be for me. The agreement was that it was a gift to me and that is the reason why I gave my own car as a deposit for the new vehicle. I never got my property back from the abuser; and my car had been falsely reported as stolen by my abuser and I was not able to drive it for I could not get insurance nor I could renew the auto sticker for the car when it was due. Judge French after verbally in court granting my motions; He changed his mind, and my ex never returned my property nor I was given the documents I needed to drive my car. Shortly after I filed a motion to have respondent found in contempt of court; I never received notification even though I repeatedly call Judge French Office for news or update. Again depriving me of my Due process and sheltering my ex-husband.

The ultimate appalling action from Judge French, is when he, did not even acknowledged my Motion for Continuance of Trial, after he had dismiss my attorney at her request, only a few weeks before Trial. He only responded verbally when I after many times of trying to reach him was able to verbally ask him and He only responded ' your Motion is denied.'

I was not represented in Court during my divorce Trial; I was in no condition to represent myself in court, I have no knowledge of the legal system and I had been under a lot of distress; I asked again in Court to please grant me a Continuance for the reasons I just described plus the fact that my Motion had never been acknowledged before; Judge Harrison, a retiree from Virginia, who I have never met before,

Amended Motion to Disqualify Page 3

was the sitting Judge this day. He responded to my pleading " I was told Not to Grant a Continuance of Trial" . Judge Harrison had been obviously briefed by Judge French Not to grant me a Continuance.

During the Trial I was not allowed to testify. My witnesses were not allowed to testify either. The court requested I reveal my living address, as requested by MR. Aragona,( opposing council). The court insisted I reveal my true address; I tried to give my ACP card with my pseudo address to the Judge, upon inspection and under Mr. Aragona's directions, Judge Harrison told me I was going to be held in contempt of Court if I did not reveal my true address (in front of my abuser) I tried to plead with the judge and told him I was afraid for my safety. ( I attest that this is true and it was omitted from the Transcript )The Judge again said I was in contempt and I had 2 mins to reveal my address. I reported a different address to the court, for Fear my life was in danger; I could not reveal to my abuser where I had been hiding for the past 3 years( since 2011) when I came back home. Everything in my life has been changed, voters registration, mail, work, everything was changed and reported to the proper authorities including the Court. Judge David French, has never acknowledge the fact that I was bullied and put in a position NO victim should be put through in front of their abuser. After the Trial, He has denied every time my efforts to prove I live in my home, I have everything to prove that; including the paper work filed with the Attorney General where my living address is in record. My own Homestead exemption. Nothing has been able to stop Judge French in wanting to sell my property, insisting I do not live there, regardless of witnesses and clear and concise documentation to prove of my Homestead. Judge David French malicious wrong doing and lack of justice in my case, has caused me my health, my job ; knowingly and maliciously Judge French is determined to steal my house, my Homestead. My pre-marital home, where I have been hiding for the past five years of my live from a despicable man who abused me, who tried to kill me with his own bare hands, and destroyed my life. I have been through a lot of pain and suffering, I had been paralyzed by fear of this man who was supposed to be my life companion. Judge French was aware I had an ACP card issued by the State Attorney General and he knew exactly why I had that ID card with a pseudo address; because I had told him so. Yet he failed maliciously to recognized or even acknowledge the psychological trauma that having been bullied and verbally abused during divorce Trial by Mr. Aragona would cause. Mr Aragona bullied my in court, and demanded I provide my living address in front of my abuser. I tried to speak with the Judge and handed him my ACP card with my pseudo address; Mr Aragona demanded the Judge to force me to say where I lived or to held in contempt of court. ( Later after Trial I learned that Mr. Aragona had filed a suit against me and I had not even been served) Based on this they are trying to take my home.

Mr. Aragona and corroborated by the Judge ; said that my ex husband and abuser, the man I have been hiding from for fear of my life, was given the right to sell my homestead with the blessing of the US Family Court. I could not believe this had happened , I had tried to prove time and time again with sworn affidavits, documentation to prove my Homestead is my own property , That I have been living there before and after I ran away from my abusive husband . I had brought witnesses, documents, and my sworn testimony that a huge injustice has been made. Judge French would not listen to any of my witnesses, or any prove presented. Mr Aragona insist that I must be lying and Judge French would not hear me. Judge French has violated all my rights, he has victimized me in court just as much as I was

Amended Motion to Disqualify Page 3

victimized by a cruel man who was my husband, or worse because Judge French represented Justice to me, the Victim. All of these information and more , much more can be easily found in my court file.

Judge French has been very bias and prejudiced against me! Ruling and making recommendations without not even allowed me to testify. I have reasons to believe Judge French will never be fair to me or my case. He has destroyed my life; and I fear he will not stop until he gets my Home and sees me on the streets, why..? Im not quite sure... Furthermore I fear I will not get a fair Trial or Hearing from any of the Judges or Magistrates is the 15<sup>th</sup> circuit court of Delray Beach. Please remove all my files from this Court.

Petitioner seeks that upon Disqualification of Judge French, that all factual or legal rulings be vacated by the successor judge due to alleged criminal acts and civil torts against Petitioner. Furthermore Petitioner seeks a replacement judge that is not from the 15 circuit court in Delray Beach, nor Magistrate.

Judge French should immediately voluntarily disqualify himself from my case.

All these information is made in god faith and are true to the best of my knowledge and belief,

Dated : May 20, 2016.

Respectfully submitted,

Julie M. Gonzalez.

PO BOX 821911

Pembroke Pines Fl 33082

PH 954 245-4653

[Juliegonzalez64@hotmail.com](mailto:Juliegonzalez64@hotmail.com)

*Julie M Gonzalez*

Certificate of Service

All Parties involved have been served by mail of this **Amended Petition** and Motion and filed with the Clerk of Court in Delray Beach Court House.

May 20, 2016.

Julie M. Gonzalez

PO box 821911

Pembroke pines Fl 33082

*Amended Motion to Disqualify  
Page 4*

*Julie M Gonzalez*

State of Florida County of Broward  
The foregoing instrument was acknowledged before me this 23 day of May, 2016,  
by Julia M. Gonzalez  
who is personally known to me or who has produced  
Driver License  
as identification.

*Diane M. Persten*, Notary Public

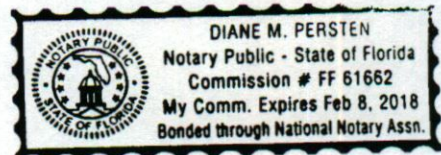


EXHIBIT 3 - Attorney Motion to Withdraw

IN RE: The Marriage of  
LLOYD G. WICKBOLDT,

Petitioner,

vs.

JULIE M. GONZALEZ,

Respondent.

IN THE CIRCUIT COURT OF THE  
15TH JUDICIAL CIRCUIT IN AND  
FOR PALM BEACH COUNTY, FLORIDA

CASE NUMBER: 2010DR003810XXXXSB/Div.FY

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**MOTION TO WITHDRAW**

Craig R. Darr, Esq. and Darr Perdigon, respectfully move this Court for the entry of an order permitting counsel and the firm to withdraw as attorneys for RESPONDENT, JULIE M. GONZALEZ, and as grounds states that counsel has been discharged by RESPONDENT and therefore can no longer represent RESPONDENT in this matter. A copy of the "Motion for Attorney Dismissal" filed by RESPONDENT on May 10, 2016 and received this date by undersigned counsel is attached hereto as Exhibit "A".

WHEREFORE, Craig R. Darr, Esq. and Darr Perdigon respectfully move this Court for the entry of an order permitting counsel and the firm to withdraw as attorneys for RESPONDENT, and further respectfully request that the Court permit undersigned counsel to appear by phone for the hearing on this motion as counsel has been discharged by the RESPONDENT.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by E-mail this 18th day of May, 2016 upon Anthony Joseph Aragona, III, Esquire, Anthony J. Aragona III, P.A., attorney for Petitioner, [Anthony.aragona@att.net](mailto:Anthony.aragona@att.net), and by Certified U.S. mail



and regular U.S. mail upon RESPONDENT, Julie M. Gonzalez at ACP #201127, P.O. Box 7297, Tallahassee, Florida 32314.

DEARR PERDIGON  
Attorneys for Respondent  
One Datran Center, Suite 1701  
9100 South Dadeland Boulevard  
Miami, Florida 33156-7817  
Telephone: (305) 670-1237  
Facsimile: (305) 670-1238  
Service Email: [service@dpmiamilaw.com](mailto:service@dpmiamilaw.com)  
Email: [craig@dpmiamilaw.com](mailto:craig@dpmiamilaw.com)

By: 

\_\_\_\_\_  
CRAIG R. DEARR, ESQUIRE  
FLORIDA BAR NUMBER: 328170  
WENDY S. ROUNDS, ESQUIRE  
FLORIDA BAR NUMBER: 746835

My  
\* COPIES -  
J.M.G.

\* DIVORCE CASE  
CASE 2010 DR 003810  
XXXX SB/DIV.F

UB A1

IN THE CIRCUIT OF THE FIFTEENTH JUDICIAL CIRCUIT,  
IN AND FOR PALM BEACH COUNTY, FLORIDA

UNIFIED FAMILY COURT

2013 CA 006759XXX

CASE NO: 502010 DR 003810 XXXX SB/D  
DIVISION: \_\_\_\_\_

FLY

IN RE:

Julie M Gonzalez  
~~Petitioner~~, Respondent

and

Hoyd G Wickboldt  
Respondent/Petitioner

**COPY**  
SOUTH COUNTY BRANCH OFFICE  
ORIGINAL RECEIVED

MAY 10 2016

SHARON R. BOCK  
CLERK & COMPTROLLER  
PALM BEACH COUNTY

MOTION FOR: Attorney Dismissal

I, (print your name) Julie M Gonzalez, the [check one]  Petitioner  
 Respondent, in the case am requesting the following Motion:

[✓ the appropriate motion(s):]

- Continue the hearing on (matter being heard) \_\_\_\_\_  
(date) 5/10/2013 (time) 3:25 PM before Judge/Commissioner Judge David French
- Dismiss (state action) Dismissal of Attorney Craig Deann
- Vacate the Court's Order which has been filed by the clerk as docket # \_\_\_\_\_
- Rehearing (check all that apply) of \_\_\_ Paternity, \_\_\_ Contempt, \_\_\_ Commitment.
- Waive Parenting/Mediation Requirements(s) for \_\_\_\_\_
- Other \_\_\_\_\_

Hereby I affirm that Julie M Gonzalez  
moves to dismiss Attorney Craig Deann -  
Any communication from now on is to be mailed  
to me: Julie Gonzalez RL  
ACP # 201127  
PO Box 7297  
TAMAHASSEE FL 32304



The following facts support the motion(s) checked above: Julie Monroze Moves For

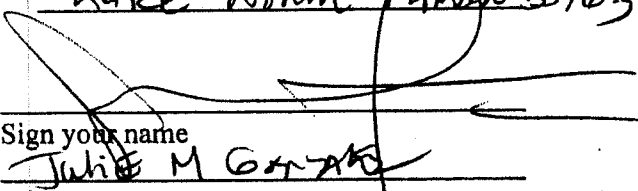
DISMISSAL OF ATTORNEY CRAIG DEAR

Any further communication should be  
mailed to me Julie Monroze

I HEREBY CERTIFY that a copy of this Motion has been mailed on (date) 5/10/2016,  
20\_\_\_\_, by regular mail , certified mail \_\_\_\_\_, hand delivered \_\_\_\_\_, e-mailed \_\_\_\_\_ served to \_\_\_\_\_

Name of other party \_\_\_\_\_  
Address \_\_\_\_\_

and to: Attorney (if any) Anthony Aragona  
Address 5097 Sand Canal Circle  
Lake Worth Florida 33463

  
Sign your name Julie M Monroze  
Print your name \_\_\_\_\_  
Address: PO Box 3297  
Tallahassee FL 32314  
Telephone ( ) 954 245-4653  
E-mail Address(es): \_\_\_\_\_

IF A NON-LAWYER HELPED YOU FILL OUT THIS FORM, THEY MUST FILL IN THE BLANKS BELOW:

I, (name of non-lawyer) \_\_\_\_\_, a non-lawyer, located at  
(street) \_\_\_\_\_ (city) \_\_\_\_\_ (state) \_\_\_\_\_,  
(phone) \_\_\_\_\_, helped {name} \_\_\_\_\_,  
who is the (check one) \_\_\_\_\_ petitioner or \_\_\_\_\_ respondent, fill out this form.

# Composite Exhibit "2"

**From:** [Kelly Huerta](#)  
**To:** [Anthony Aragona](#)  
**Subject:** Wickboldt v. Gonzalez  
**Date:** Friday, May 20, 2016 5:54:50 PM  
**Attachments:** [Ltr to Judge French sending proposed order to withdraw 5-20-16.pdf](#)

---

Dear Mr. Aragona,

Attached please find correspondence to Judge French.

If you have any questions or comments, please do not hesitate to contact our office.

Thank you,

*Kelly Huerta*

Paralegal



**9100 South Dadeland Boulevard**

**Suite 1701**

**Miami, Florida 33156-7817**

**305-670-1237**

**305-670-1238 fax**

**Email: [kelly@dpmiamilaw.com](mailto:kelly@dpmiamilaw.com)**

**[www.dpmiamilaw.com](http://www.dpmiamilaw.com)**

This email may contain legally privileged and confidential information intended only for the use of the addressee(s) named above. If you are not the intended recipient of this email, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this email is strictly prohibited. If you have received this email in error, please immediately notify us by telephone (305-670-1237) so that we can arrange to have the original returned to us or forwarded to the intended recipient. Thank You.

 **DEARR PERDIGON**  
Attorneys At Law  
A Partnership including Professional Associations

Craig R. Darr  
Scott J. Perdigon  
Wendy S. Rounds

One Dattran Center  
Penthouse 1, Suite 1701  
9100 South Dadeland Boulevard  
Miami, Florida 33156-7817

Ph. 305-670-1237  
Fax 305-670-1238  
craig@dpmiamilaw.com  
www.dpmiamilaw.com

May 20, 2016

The Honorable David E. French  
Main Courthouse  
205 North Dixie Highway  
Courtroom 2  
West Palm Beach, Florida 33401

Re: Lloyd Wickboldt v. Julie M. Gonzalez  
Case Number: 2010DR003810XXXXSB/Div.FY  
Our File Number: 5471.4

Dear Judge French:

Enclosed is a proposed Order on Craig R. Darr, Esq. and Darr Perdigon's Motion to Withdraw as Counsel for Defendant, Julie M. Gonzalez. Copies of the proposed order and this letter have been sent to Anthony Aragona, Esq. and Julie Gonzalez via email. If the Order meets with your Honor's approval, please sign the Order and have your judicial assistant send the conformed copies in the enclosed self-addressed, stamped envelopes. If you require any changes, please have the judicial assistant contact me and they will be made promptly.

Respectfully,

DEARR PERDIGON



CRAIG R. DEARR  
For the Firm

CRD/kh  
Enclosure as stated.

c. Anthony Joseph Aragona, III, Esquire  
Julie Gonzalez, *pro se*

IN RE: The Marriage of  
LLOYD G. WICKBOLDT,

Petitioner,

vs.

JULIE M. GONZALEZ,

Respondent.

IN THE CIRCUIT COURT OF THE  
15TH JUDICIAL CIRCUIT IN AND  
FOR PALM BEACH COUNTY, FLORIDA

CASE NUMBER: 2010DR003810XXXXSB/Div.FY

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**ORDER ON CRAIG R. DEARR, ESQ. AND DEARR PERDIGON'S MOTION TO  
WITHDRAW AS COUNSEL FOR DEFENDANT JULIE M. GONZALEZ**

THIS CAUSE came before the Court on Craig R. Dearr, Esq. and Dearr Perdigon's Motion to Withdraw as counsel for Defendant, Julie M. Gonzalez. The Court having been advised that counsel has been discharged by Respondent by the Motion for Attorney Dismissal filed with the Court on May 10, 2015, a copy of which having been attached to counsel's motion to withdraw, having reviewed the file and being otherwise fully advised in the premises it is

ORDERED AND ADJUDGED that Craig R. Dearr, Esq. and Dearr Perdigon's Motion to Withdraw as Counsel for Defendant, Julie M. Gonzalez, is hereby granted. Until new counsel appears for Defendant, Julie M. Gonzalez, all papers shall be served upon Defendant by Email at [juliegonzalez64@hotmail.com](mailto:juliegonzalez64@hotmail.com). Defendant shall be responsible to notify the Court and opposing counsel if her Email address changes.

DONE AND ORDERED at Palm Beach County, Florida this \_\_\_\_ day of May,  
2016.

---

HONORABLE DAVID E. FRENCH  
CIRCUIT COURT JUDGE

Copies Furnished to:  
ANTHONY ARAGONA, ESQUIRE  
CRAIG R. DEARR, ESQUIRE  
JULIE M. GONZALEZ, *pro se*

EXHIBIT 4 - Order on Motion to Withdraw



LLOYD G. WICKBOLDT,  
Plaintiff,

IN THE CIRCUIT COURT OF THE  
15TH JUDICIAL CIRCUIT IN AND  
FOR PALM BEACH COUNTY, FLORIDA

vs.

JULIE M. GONZALEZ and  
AMTRUST BANK,

CASE NUMBER: 502013CA006759XXXMB AA  
CIRCUIT CIVIL DIVISION

Defendants.

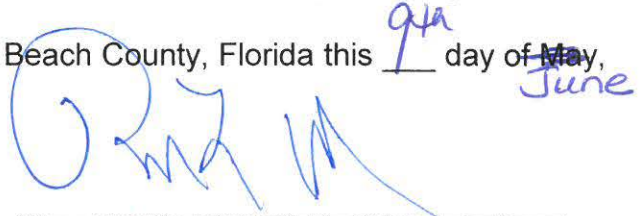
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**ORDER ON CRAIG R. DEARR, ESQ. AND DEARR PERDIGON'S MOTION TO  
WITHDRAW AS COUNSEL FOR DEFENDANT JULIE M. GONZALEZ**

THIS CAUSE came before the Court on May 19, 2016 at 8:45 a.m. on Craig R. Darr, Esq. and Darr Perdigon's Motion to Withdraw as counsel for Defendant, Julie M. Gonzalez, the Court having heard argument of counsel, having confirmed with Defendant Gonzalez in open court that she did not object to the granting of the motion permitting counsel to withdraw, having reviewed the file and being otherwise fully advised in the premises it is

ORDERED AND ADJUDGED that Craig R. Darr, Esq. and Darr Perdigon's Motion to Withdraw as Counsel for Defendant, Julie M. Gonzalez, is hereby granted. Until new counsel appears for Defendant, Julie M. Gonzalez, all papers shall be served upon Defendant by Email at [juliegonzalez64@hotmail.com](mailto:juliegonzalez64@hotmail.com). Defendant shall be responsible to notify the Court and opposing counsel if her Email address changes.

DONE AND ORDERED at Palm Beach County, Florida this 19 day of ~~May~~ <sup>June</sup>,  
2016.



---

HONORABLE RICHARD OFTEDAL  
CIRCUIT COURT JUDGE

Copies Furnished to:  
ANTHONY ARAGONA, ESQUIRE  
CRAIG R. DEARR, ESQUIRE  
JULIE M. GONZALEZ, *pro se*