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IN THE COUNTY COURT, FOURTH
JUDICIAL CIRCUIT, IN AND FOR
DUVAL COUNTY, FLORIDA

NELSON ESTATES CORP,
Plaintiff,
vs.

Case No.: 2020-CC-4513
Division: CC-J

LORI FELICIA KING
Defendant.

MOTION FOR DEFAULT FINAL JUDGMENT- UNLAWFUL DETAINER

COMES NOW, the Plaintiff(s), NELSON ESTATES CORP, by and through its undersigned counsel and moves for the entry of a default Final Judgment for Unlawful Detainer against Defendant(s), LORI FELICIA KING, and alleges as follows:

1. This is an action to recover possession of real property unlawfully detained pursuant to Florida Statutes Chapter 82, located in Duval County, Florida.
2. Nelson Estates Corp. is the owner of the real property known as 2920 Thomas Street, Jacksonville, Duval County, Florida (hereinafter, the "Property"). A copy of the Quitclaim Deed conveying the property to Nelson Estates Corp. is attached hereto as **Exhibit "1"**.
3. Defendant(s) was duly served with summons and having not filed an answer, and said Defendant(s) having failed to plead any viable legal defenses as to why Plaintiff should not recover possession of its property from Defendant(s), Plaintiff filed its Motion For Default and Clerk's Default for which the Clerk of Court was unable to issue. A copy of the Motion For Default and Clerk's Default is attached hereto as **Exhibit "2"**.
4. On about May 22, 2020, in his capacity as CEO for Nelson Estates Corp., Tony James Nelson, II revoked consent for the Defendant, Ms. King to remain in the Property and demanded that the Defendant, Ms. King immediately vacate the Property. A copy of the Affidavit

of Tony James Nelson, II is attached hereto as **Exhibit "3"**

6. The Defendant, Lori Felicia King (hereinafter, the "Ms. King "), continues to reside in the property against Nelson Estates Corp's consent and without an agreement to pay rents.

WHEREFORE the Plaintiff respectfully request this Court enter a Final Judgment - Unlawful Detainer against Defendants, and any other further relief this Court deems proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 12th, 2020 a true and correct copy of the foregoing has been furnished to defendant via US mail at 2920 Thomas Street, Jacksonville, Florida 32254 via mail.

The Legal Consult, P.A.
/s/ R. Cash Barlow
R. Cash Barlow, Esq.
355-1 East Monroe Street
Jacksonville, FL 32202
FBN 946450
904.549.7346
Attorney for Plaintiff

EXHIBIT

1

Prepared By:

Tony James Nelson II
2920 Thomas St
JACKSONVILLE, Florida 32254

After Recording Return To:

NELSON ESTATES CORP
2920 Thomas St
JACKSONVILLE, Florida 32254

SPACE ABOVE THIS LINE FOR RECORDER'S USE

QUITCLAIM DEED

WITNESSETH, on April 11, 2018 THE GRANTOR(S),

- Tony James Nelson II, a single person,

for and in consideration of the sum of: One Dollar (\$1.00) and/or other good and valuable consideration to the below Grantee(s) in hand paid by the Grantee(s), the receipt whereof is hereby acknowledged:

- NELSON ESTATES CORP, Tony James Nelson II, CEO residing at 2920 Thomas St, JACKSONVILLE, Duval County, Florida 32254

Grantor does hereby remise, release, and quit-claim unto the Grantee, the Grantee's heirs and assigns forever, all the rights, title, interest, claim of the Grantor in and to the following described land in the County of Duval, state of FLORIDA to wit:

2920 Thomas St
JACKSONVILLE, Florida
32254

Legal Description:

3-39 16-2S-26E .114 WOODSTOCK LOT 4,N1/2 CLOSED ALLEY LYING S THEREOF
BLK 2

To have and to hold the same together with all and singular the appurtenances thereunto belonging

or in anywise appertaining, and all the estate, right, title, interest, lien, equity, and claim whatsoever for the Grantor, either in law or equity, to the only proper use, benefit and behoof of the Grantee forever.

Tax Parcel Number: 056474-0040

Mail Tax Statements To:
NELSON ESTATES CORP
2920 Thomas St
JACKSONVILLE, Florida 32254

[SIGNATURE PAGE FOLLOWS]

DATED:

221

In Witness Whereof,

Jacksonville
Florida

 **NINA MIXSON**
Commission # FF 942340
Expires December 9, 2019
Bonded thru Troy Fair Insurance 800-366-7078

FF 942340
Serial number (if applicable)

EXHIBIT

2

IN THE COUNTY COURT, IN THE
FOURTH JUDICIAL CIRCUIT, IN AND
FOR DUVAL COUNTY, FLORIDA

NELSON ESTATES CORP,
Plaintiff,
vs.

Case No.: 2020-CC-4513
Division: CC-J

LORI FELICIA KING
Defendant.
_____ /

MOTION FOR DEFAULT AND CLERK'S DEFAULT - RESIDENTIAL EVICTION

Plaintiff, NELSON ESTATES CORP, moves for the entry of a default by the clerk against defendant, LORI FELICIA KING for failure to serve any paper on the undersigned or to file any paper as required by law.

I hereby certify that no copy of an answer or other pleading of defendant in the above-styled cause has been served on plaintiff or her attorney as of the time of filing this motion for default.

DATED: June 10, 2020

/s/ R. Cash Barlow
The Legal Consult, P.A.
R. Cash Barlow, Esq.
355-1 East Monroe Street
Jacksonville, FL 32202
FBN 946450
Attorney for Plaintiff
904.549.7346

DEFAULT - RESIDENTIAL EVICTION

A default is entered in this action against the defendant named in the foregoing motion for failure to serve or file any paper as required by law.

ORDERED at Jacksonville, Duval County, Florida on _____

UNABLE TO ISSUE
DEFAULT,
AWAITING
CERTIFICATE OF
MAILING

RONNIE FUSSELL
CLERK OF THE COUNTY COURT

By: /s/ _____
Deputy Clerk

EXHIBIT

3

IN THE COUNTY COURT, FOURTH
JUDICIAL CIRCUIT, IN AND FOR
DUVAL COUNTY, FLORIDA

NELSON ESTATES CORP,
Plaintiff,
vs.

Case No.: 2020-CC-4513
Division: CC-J

LORI FELICIA KING
Defendant.

**AFFIDAVIT OF TONY JAMES NELSON, II, CEO
NELSON ESTATES CORP.**

I, **TONY JAMES NELSON, II**, declare and state as follows:

1. I, Tony James Nelson, II, am the Chief Executive Officer (CEO) of Nelson Estates Corp a Florida Not For Profit Corporation.
2. Nelson Estates Corp. acquired the real property known as 2920 Thomas Street, Jacksonville, Duval County, Florida (hereinafter, the "Property") on or about April 11th, 2018. A copy of the Quitclaim Deed conveying the property to Nelson Estates Corp. is attached hereto as Exhibit "A"
3. The Defendant, Lori Felicia King (hereinafter, the "Ms. King "), was residing in the property, without an agreement to pay rents.
4. On about May 22, 2020, in my capacity as CEO for Nelson Estates Corp., revoked consent for the Defendant, Ms. King to remain in the Property and demanded that the Defendant, Ms. King immediately vacate the Property.
5. On or about May 22, 2020, after demanding that the Defendant, Ms. King vacate the property, she refused, became violent, and was subsequently arrested for domestic battery. A copy of the Violent Crime Acknowledgement Form and JSO Inmate Information Search (Jail Number 2020011777/JSO ID 795687) is attached hereto as composite Exhibit "B".

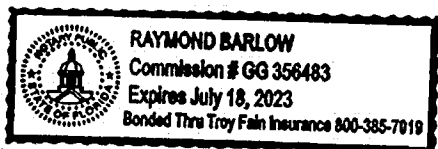
6. The Defendant, Ms. King, has refused to vacate the Property and continues in possession of the Property against Nelson Estates Corp's consent.

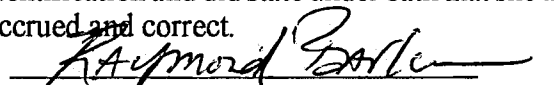
I hereby swear or affirm that the above statements are true and correct.


TONY JAMES NELSON, II

STATE OF FLORIDA)
COUNTY OF DUVAL)

SWORN TO AND SUBSCRIBED before me that undersigned authority by TONY JAMES NELSON, II, who produced FL DRIVER'S as identification and did state under oath that she has personal knowledge of the foregoing and that it is accrued and correct.




NOTARY PUBLIC STATE OF FLA.
NAME: Raymond Barlow
Commission number: _____
Commission expires: _____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on 12 JUNE, 2020 a copy of the foregoing was served on defendant, at 2920 Thomas Street, Jacksonville, Florida 32254 via mail.

Respectfully submitted,

THE LEGAL CONSULT, P.A.

/s/ R. Cash Barlow
R. CASH BARLOW, ESQUIRE
Attorney for Plaintiff
355-1 East Monroe St.
Jacksonville, FL 32202
Tel: (904) 549-7346
cash.barlow@thelegalconsult.com
FBN.: 946450

EXHIBIT

A

Prepared By:

Tony James Nelson II
2920 Thomas St
JACKSONVILLE, Florida 32254

After Recording Return To:

NELSON ESTATES CORP
2920 Thomas St
JACKSONVILLE, Florida 32254

SPACE ABOVE THIS LINE FOR RECORDER'S USE

QUITCLAIM DEED

WITNESSETH, on April 11, 2018 THE GRANTOR(S),

- Tony James Nelson II, a single person,

for and in consideration of the sum of: One Dollar (\$1.00) and/or other good and valuable consideration to the below Grantee(s) in hand paid by the Grantee(s), the receipt whereof is hereby acknowledged:

- NELSON ESTATES CORP, Tony James Nelson II, CEO residing at 2920 Thomas St, JACKSONVILLE, Duval County, Florida 32254

Grantor does hereby remise, release, and quit-claim unto the Grantee, the Grantee's heirs and assigns forever, all the rights, title, interest, claim of the Grantor in and to the following described land in the County of Duval, state of FLORIDA to wit:

2920 Thomas St
JACKSONVILLE, Florida
32254

Legal Description:

3-39 16-2S-26E .114 WOODSTOCK LOT 4,N1/2 CLOSED ALLEY LYING S THEREOF
BLK 2

To have and to hold the same together with all and singular the appurtenances thereunto belonging

or in anywise appertaining, and all the estate, right, title, interest, lien, equity, and claim whatsoever for the Grantor, either in law or equity, to the only proper use, benefit and behoof of the Grantee forever.

Tax Parcel Number: 056474-0040

Mail Tax Statements To:
NELSON ESTATES CORP
2920 Thomas St
JACKSONVILLE, Florida 32254

[SIGNATURE PAGE FOLLOWS]

DATED:

DATED: 4/11/18

221

~~In Witness Whereof,~~

In Witness Whereof

[Signature] Witness

Gimalys Collozo

[Signature] Witness

**Jacksonville
Florida**

The foregoing instrument was acknowledged before me this 11 day of April, 2018 by Tony James Nelson II, who are personally known to me or who have produced Florida Drivers License as identification.



Anna Wilson
Signature of person taking acknowledgment

Nina Mixson
Name typed, printed, or stamped

Notary
Title or rank

FF 942340
Serial number (if applicable)

EXHIBIT

B

VIOLENT CRIME ACKNOWLEDGEMENT FORM

JACKSONVILLE SHERIFF'S OFFICE (JSO)

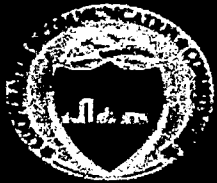


Approving Initials

JSO Approving ID

DATE (mm/dd/yyyy): 05/11/2010		Have citizen initial the section boxes that apply.		CCR: 347035	
Initials: TN		DOMESTIC VIOLENCE			
		I verify the Domestic Violence Threat Level Assessment Factors were discussed with me.			
Initials: TN		PERSONAL INFORMATION - PUBLIC RECORDS EXEMPTION			
		Pursuant to F.S. section 119.071(2)(j)1, I verify that I am the victim of one or more of the following offenses: sexual battery, aggravated child abuse, aggravated stalking, harassment, aggravated battery or domestic violence.			
		I understand that any information not otherwise confidential or exempt from F.S. section 119.07(1) which reveals my home or employment telephone number, home or employment address, or personal assets will be exempt from disclosure for a period of five (5) years after the execution and receipt of the request by the Jacksonville Sheriff's Office in response to my (the victim's) request.			
		I understand that a federal or state government agency that is authorized to inspect any of the referenced information may be granted the ability to review the documents/information when authorized by applicable law.			
		I, <u>722-11</u> , request that the Jacksonville Sheriff's Office not release any information set forth in F.S. section 119.071(2)(j)1.			
Initials: TN		Pursuant to F.S. section 741.29(2), a General Offense Report will be released to the Hubbard House, Women's Center of Jacksonville, and/or the City of Jacksonville Victims Services Center. I, _____, authorize the Jacksonville Sheriff's Office to send the General Offense Report, specifically referencing my name and identifying information, relating to this offense/incident to the Hubbard House, Women's Center of Jacksonville, and/or the City of Jacksonville Victims Services Center for the purpose of offering services concerning the offenses subject to the above reference CCR number.			
Initials: TN		VICTIM / WITNESS SERVICES GUIDE			
		I have received a <i>Victim/Witness Services Guide</i> which contains information on the Victim Information Notification Everyday (VINE) program. The Jacksonville Sheriff's Office automatically registers the victim, or appropriate next of kin of the victim, of any an offense involving domestic violence homicide, attempted murder, sexual battery, stalking, cyberstalking, kidnapping related to domestic violence or false imprisonment related to domestic violence. I understand I will be notified when the offender(s) is released by the Department of Corrections. I understand if I do not answer the telephone call within 24 hours of the offender(s) release, I will receive a written notice.			
		The person to be contacted is: (check one) ☒ victim ☐ next of kin ☐ contact designated by victim.			
		PIN # 112 1112			
Initials: TN		HUBBARD HOUSE			
		I, _____, authorize the staff at Hubbard House to release information about my residential status to a Jacksonville Sheriff's Office representative for the purpose of scheduling an interview. The authorization to release information about my residential status is subject to my revocation at any time except to the extent that Hubbard House has already disclosed and/or taken action in reliance on it.			
VICTIM (PRINT)		SIGNATURE: VICTIM/OTHER (IF VICTIM IS A JUVENILE)			
First Name	Last Name				
Tony	Nelson	<u>722-11</u>			
OFFICER INITIALS, LAST NAME		R. Parrish		OFFICER ID # 73410	

USE P-0349 FOR SUSPECT/VICTIM/WITNESS STATEMENTS



Duval County,
Florida

JACKSONVILLE SHERIFF'S OFFICE DEPARTMENT OF CORRECTIONS

[Home](#)

[Jacksonville Sheriff's Office](#)

[Corrections Facility Information](#)

[Crime Stoppers](#)

[Justice Coalition](#)

[Crime Tip](#)

JSO Inmate Information Search

[Public Web Reports](#)

In Sheet

Go

[HTML Printer-Friendly Version](#)

KING, LORI FELICIA

Jail Number: 2020011777

JSO ID: 795687

Dial 911 for Emergencies

Jail Info:

(904) 630-5760

Police Info:

(904) 630-7600

[Help](#)

[Webmaster](#)

Inmate Information

Housing Location: PDF

ID Check Completed: Y

Released: N/A

Bond Agency: N/A

Age: 37

Race: B

Sex: F

Height: 505 inches

Arrested: 05/22/2020

Length of Sentence: N/A

Pending Unsented Charges: Yes

Payment Required For Release: * \$22,509.00

Completed Admissions Process: Y

Arresting Agency: JACKSONVILLE SHERIFF'S OFFICE

How Long in Jax (Years/Months): 5/0

Next Court Date: 06/11/2020 09:00 AM , COURTHOUSE, CIR

Visitation Information: 8:00 AM to 10:00 PM, Wednesday (Visits are limited to 1 visit per week for maximum of 2 hours)

Admitted: 05/22/2020 04:25 AM

Release Reason: N/A

Bond Agency Address: N/A

Eyes: BROWN

Hair: BLACK

Weight: 136 pounds

Expected Release Date: N/A

Charge Information

Statute: 843.02 Description: RESISTING OFFICER WITHOUT VIOLENCE TO HIS OR HER PERSON

Bond: \$5,003.00 **Fine:** N/A **Purge:** N/A **Blanket Bond Group:**

Charge Type: MISD **Capias/Warrant:** N/A **Case #:** N/A **OBTs:** 1607048689

Date Entered: 5/22/2020 6:04:14 AM **Charge Status:** AWAITING TRIAL

Jurisdiction: N/A

Sentence Date: N/A **Years:** 0 **Months:** 0 **Days:** 0

Charge Comments: N/A

Statute: 784.03(1)(A)(1) Description: BATTERY - TOUCH OR STRIKE - NO INJURY - DOMESTIC - PERSONAL OR SPECIAL WEAPON

Bond: \$7,503.00 **Fine:** N/A **Purge:** N/A **Blanket Bond Group:**

Charge Type: MISD **Capias/Warrant:** N/A **Case #:** N/A **OBTs:** 1607048689

Date Entered: 5/22/2020 6:02:49 AM **Charge Status:** AWAITING TRIAL

Jurisdiction: N/A

Sentence Date: N/A **Years:** 0 **Months:** 0 **Days:** 0

Charge Comments: N/A

Statute: 787.02(2) Description: FALSE IMPRISONMENT

IN THE COUNTY COURT, FOURTH
JUDICIAL CIRCUIT, IN AND FOR
DUVAL COUNTY, FLORIDA

NELSON ESTATES CORP,
Plaintiff,
vs.

Case No.: 2020-CC-4513
Division: CC-J

LORI FELICIA KING
Defendant.

**JUDGMENT FOR POSSESSION
UNLAWFUL DETAINER**

THIS ACTION came before the Court upon **Plaintiffs' Complaint for Unlawful Detainer** from the premises described in the Complaint, and it appears that Defendant(s) was duly served with Notice and process as required by law and:

Defendant(s) having not filed a response, and said Defendant(s) having failed to plead any viable defenses as to why Plaintiff should not recover possession of its property from Defendant.

IT IS THEREFORE ordered by the Court that a Judgment be and hereby entered against Defendant(s), and that the Plaintiffs does have and recover of and from the Defendant(s), LORI FELICIA KING, possession of the premises situated in the County of Duval, State of Florida described as: **2920 Thomas Street, Jacksonville, Florida 32254** and and \$ _____ as court cost, for which let Writs of Possession and Execution now issue.

DONE AND ORDERED in Jacksonville, Duval County, Florida on this ____ day of _____, 2020

ELENI DERKE
COUNTY COURT JUDGE

copies to:

R. Cash Barlow, Attorney For Plaintiff
cash.barlow@thelegalconsult.com

Lori Felicia King, Defendant
2920 Thomas Street
Jacksonville, Florida 32254

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