

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

Case No.: 50-2019-CA-016488

GABE HOFFMAN, an individual,

Plaintiff,

VS.

JULIO CESAREO JACQUEZ a/k/a JULIO JACQUES a/k/a ALL AMERICAN CARTEL LLC,
an individual.

Respondent

_____ /

DEFENDANT JULIO JACQUEZ'S LIMITED AND SPECIAL APPEARANCE FOR THE
FOLLOWING PURPOSES:

(1) Motion to dismiss for lack of personal jurisdiction and (2) Motion to Dismiss for failure to state a claim for which relief can be granted and (3) Motion to dismiss for Lack of Subject Matter Jurisdiction and (4) motion to dismiss for Improper venue (5) Motion to Dismiss for insufficient Service of Process and (6) Motion for Sanctions and for involuntary dismissal due to Plaintiff's attempt to commit fraud upon the court

The Defendant Julio Jacquez, Enters this Limited and Special appearance for the

sole purpose of moving to Dismiss for lack of personal jurisdiction and failure to State a claim and lack of subject matter and insufficient service of process and for plaintiff's attempt to defraud the court and for a more Definitive statement.

COMES NOW Julio Jacquez, and makes their appearance and shall henceforth be referred to as 'the defendant'. Substantial issues are presented which dramatically affect standing, service and sufficiency of process, subject matter jurisdiction, joinder, venue, and other strictly procedural and jurisdictional defenses.

Affirmative Defenses may be offered at the appropriate time, but are not advanced in this Special Appearance. These issues are not waived, and are expressly reserved for pleading, motion, briefing and action with expedition consistent with orderly procedure, as appropriate.

1. The Plaintiff's Allegations are knowingly false and an attempt to intimidate the defendant.
2. The Allegations in themselves absolves the Defendant of any wrong doing by naming the Original Uploaders and publishers involved in the complaint itself.
3. The Plaintiffs allegations are vague and a more definitive statements is needed by the defendant to better respond to the allegations
4. The defendant is a self representing litigant

5. The Plaintiff is attempting to defraud the courts and is prosecuting the Defendant Maliciously
6. Plaintiff is taking comments made by the defendant out of context in order to defraud the court and intimidate the defendant
7. Plaintiff is attempting to abuse the process of the courts in order to intimidate and silence those wishing to enjoy their first amendment right.
8. Plaintiff has a long history of Cyber Bullying and Gang Stalking
9. Plaintiff already has an unsavory reputation and has had this reputation since before the L.L.C was even formed
10. Plaintiff Has failed to adequately allege what exactly the Defendant actually said.
11. Isaac Kappy is not the Defendant
12. Qanon is not the defendant
13. Thomas Shoenberger is NOT the Defendant
14. Zack Quaid is not the Defendant
15. Defendant is confused as to what statements he is actually being accused of making.
16. Defendant asks that this case be dismissed for the multiple reasons stated above with extreme prejudice.
17. Defendant is President at An All American Cartel L.L.C
18. Defendant is not the Owner of An All American Cartel LLC
19. The Defendant plays a Character named Julio Hawkes
20. Julio Hawkes is a Character created by An All American Cartel LLC

21. The Defendant wished to keep his personal life separate from that of the character played by the defendant for An All American Cartel L.L.C
22. An All American Cartel L.L.C was formed in Colorado in January of 2019
23. The Alleged Complaint would have happened in Colorado and the Defendant is indigent and is pretty much judgement proof as he is disabled and hasn't worked in 2 years
24. The L.L.C the defendant owns is in the negative.
25. Defendant Intends on pursuing legal remedy for the Abuse of Process, malicious prosecution.
26. Defendant is also planning on notifying the F.B.I Cyber Crimes Division of the situation
27. F.B.I already has a file on the Plaintiff for similar crimes and has a long history of being reported to the F.B.I for this egregious abuse of power against weak, poor individuals that can not defend fairly against the plaintiffs immense wealth.
28. Plaintiff is rumored to be worth over 100 million dollars
29. Defendant is rumored to be worth negative 100 million dollars
30. No Remedy is to be had and this is a waste of the courts time
31. Defendant suggests the courts stop humoring this obvious abuse of power and Malicious prosecution by Dismissing and allowing the defendant to pursue legal action from Colorado.
32. Defendant has evidence that shows the Plaintiff is actually guilty of the things he accuses the defendant of doing

33. Plaintiff Doxxed The Defendant and posted on twitter the Defendants Address and made Defaming comments regarding his identity
34. Defendant was not served by the Local Sheriff and complaint states that it must be a local sheriff.
35. Defendant found paperwork in the dirt outside of his home, looks like the family dog got to it. And questioned the validity of service
36. Defendant was not served properly given he didn't see the paperwork till later on and thought it was a scam.
37. Defendant requests this Amended Complaint be dismissed with Extreme Prejudice due to the Plaintiffs ability to continue to file frivolous suits in attempt to abuse the integrity of the court and the process in which it serves

IN CONCLUSION:

The Defendant wishes to inform the court that if this abuse of process continues we will seek to request a change of venue in the interest of justice. Defendant Denies all Allegations and will prove his case if need be. Defendant also intends on filing a counter claim on the alternative that this complaint is pushed forward and does not get dismissed.

If this case gets dismissed the Defendant intends on suing Gabe Hoffman for abuse of process and malicious prosecution and the Defendant has the ability to pierce the veil of the corporation "Acciphter" belonging to and owned by the Plaintiff, a one Gabe Hoffman. What the plaintiff is doing is

not consistent with the truth and is the plaintiffs form of weaponizing the courts. The defendant requests an immediate change of venue to any adequate court in Colorado the courts sees fit on the unlikely event this complaint goes any further and at the soonest moment available to the Judge a/k/a your Honor so that the defendant may utilize low income legal assistance. Please be advised the Defendant is a self representing indigent litigant. Defendant has no means to travel and is disabled. The Plaintiff is attempting to attribute the comments of others to the defendant. The defendant had no hand in creating the original videos and was never contacted by gabe hoffman until the defendant sent a stranger to the home of the defendant not to mention told his 100 thousand followers on twitter where the defendant lived gave them pictures and implied and or said he was attempting to hide his identity in an attempt to avoid legal prosecution which is not true.

I HEREBY CERTIFY that a copy hereof has been furnished by Julio Jacquez mailed; via E-file and E-mail

to the persons listed below on day of 20th 2020.

Dated: January 20th 2019

_____ julio jacquez _____

Signature, pro se

Printed Name: Julio Jacquez

Address: 25150 county road 65.4

City State Zip: Iliff, Colorado 80736

Telephone No.: 1-970-571-3751