

# The Florida Bar Inquiry/Complaint Form




**STOP - PLEASE DOWNLOAD THIS FORM TO YOUR COMPUTER BEFORE FILLING IT OUT.**

**PART ONE (See Page 1, PART ONE – Complainant Information.):**

Your Name: Anthony J. Aloneftis, Esq.  
Organization: Accident & Injury Legal Center, P.A.  
Address: 2114 Flamingo Road, Suite 2329  
City, State, Zip Code: Pembroke Pines, Florida 33028  
Phone: (786) 663-5137  
Email: AJA1Law@yahoo.com  
ACAP Reference No.: \_\_\_\_\_

Does this complaint pertain to a matter currently in litigation?    Yes      X      No    \_\_\_\_\_

**PART TWO (See Page 1, PART TWO – Attorney Information.):**

Attorney's Name: Tarlika Teresa Nuñez-Navarro    Florida Bar No.    #85175  
Address:   
City, State, Zip Code:   
Phone: 

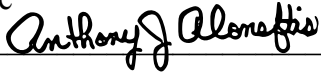
**PART THREE (See Page 1, PART THREE – Facts/Allegations.): The specific thing or things I am complaining about are: (attach additional sheet).**

**PART FOUR (See Page 1, PART FOUR – Witnesses.): The witnesses in support of my allegations are: (attach additional sheet).**

**PART FIVE (See Page 1, PART FIVE – Acknowledge Oath and Signature.):**

YOU MUST PLACE YOUR MARK IN THE BOX ACKNOWLEDGING THE OATH AND YOU MUST SIGN YOUR FULL NAME BELOW.

**Under penalties of perjury, I declare that the foregoing facts are true, correct and complete.**

Anthony J. Aloneftis, Esq.  
Print Name  
  
Signature  
4-14-26  
Date


\*Having trouble? Download the form and open the document in Adobe Acrobat™.

**To: The Florida Bar – Attorney Consumer Assistance Program / Intake**

**Re: Complaint Concerning Tarlika Nunez-Navarro – False Verified Filings, Candor Toward the Tribunal, Abuse of Judicial Process, and Request for Independent Review**


**Submitted by:**

Anthony J. Aloneftis, Esq.  
Accident & Injury Legal Center, P.A.  
2114 Flamingo Road, Suite 2329  
Pembroke Pines, Florida 33028  
AJA1Law@yahoo.com  
(786) 663-5137

On behalf of: Sean 

**To Whom It May Concern:**

This complaint concerns Tarlika Nunez-Navarro's knowing **FALSE STATEMENT** of Material Fact made **UNDER OATH TO THE TRIBUNAL**.

**On March 18, 2026**, Tarlika Nunez-Navarro personally Signed and Verified **UNDER OATH** a Motion for Contempt in Case No. 05-2025-DR-.

In paragraph 9 she **SWORE**:

"The Wife contacted the IRS and was Provided Confirmation that the Tax Return **CHECK** in the amount of **\$39,445.00** ... has been **CASHED.**"

This **SWORN** Statement was Knowingly **FALSE**. The **IRS** has confirmed that the **ONLY** communication Tarlika Nunez-Navarro had with the **IRS** regarding this Refund was on November 20, 2025. At that time **SHE WAS INFORMED** the Check had been sent out and **HAD NOT BEEN CASHED**.

At the time she filed the verified motion, the **CHECK HAD NOT BEEN CASHED**.

The parties had already entered a Stipulated Order on March 4, 2026 requiring the check be deposited into counsel's IOLTA and split 50/50. The issue was resolved by Court Order on March 27, 2026.

Based on this **FALSE SWORN** assertion, Ms. Nunez-Navarro Sought a Finding of **CONTEMPT** against my Client, a **\$39,445 PURGE**, Issuance of a **BENCH WARRANT** if unpaid, attorney's **FEES**, and other **SANCTIONS**.

As **Dean of St. Thomas University College of Law**, a former Florida Circuit Court Judge, and a current member of Florida Bar leadership roles (including the Supreme Court Historical Society), MS. Nunez-Navarro's knowing **FALSE STATEMENT** to the **TRIBUNAL** is especially serious.

As such, Ms. Nunez-Navarro is exceptionally familiar with the **SIGNIFICANCE** of Verified Pleadings, Contempt Remedies, Duties of **CANDOR** to the **TRIBUNAL**, and the Severe Consequences of Seeking **INCARCERATION-RELATED RELIEF** through the Judicial Process.

## PART THREE - Facts/Allegation

### I. VERIFIED CONTEMPT MOTION SEEKING INCARCERATION-RELATED RELIEF

On or about March 18, 2026, Tarlika Nunez-Navarro **Bar #85175** personally **SIGNED AND VERIFIED** a Motion for Contempt in pending Family-Law litigation involving our client, Sean .

In substance, the Verified Motion Represented that Ms. Nunez-Navarro contacted the **IRS** and was informed that the parties' joint tax refund check in the amount of **\$39,445.00** had been **CASHED**.

Based upon that **SWORN** Assertion, Ms. Nunez-Navarro sought the following relief against our client:

- A finding of **Contempt**;
- Establishment of a **Financial Purge** in the amount of \$39,445.00;
- Issuance of a **Bench Warrant** if unpaid;
- Attorney's **Fees, Costs, and Suit Monies**; and
- Such **Further Relief** as the Court deemed Proper.

In practical effect, our client was Exposed to the **THREAT** of Coercive Contempt Sanctions, **Potential Incarceration**, Severe Financial Pressure, and Additional Fees based upon the **SWORN CLAIM** that the Joint **IRS** Tax Return check had been **CASHED** by our client.

### II. MATERIAL FALSITY OF THE SWORN ASSERTION

That assertion was materially **FALSE**, or made with reckless disregard for the **TRUTH**.

At the time the motion was filed:

- The check had **NOT** been **CASHED**;

- It remained Physically in Existence;
- It was Available to be produced; and
- It was subsequently Delivered and Documented.

Our client thereafter filed a Verified Response Contesting the **SWORN** Allegations and Advising the **COURT** that the Check had **NOT** been **CASHED**.

Accordingly, the Contempt Motion Sought **SEVERE** Relief on a Materially **FALSE** Factual **PREMISE**.

### **III. HARM SUFFERED BY OUR CLIENT**

As a Direct result of this Conduct, our Client has Suffered:

- **FEAR** of Incarceration and Bench-Warrant Exposure;
- Substantial **EMOTIONAL** Distress;
- Unnecessary legal **FEES** and Litigation **COSTS**;
- Repetitional **HARM**;
- **FINANCIAL** Coercion; and
- Ongoing **PREJUDICE** within already Contentious Litigation.

No Litigant should be **FORCED** to **DEFEND** against threatened Contempt **INCARCERATION** based upon **FALSE SWORN** Allegations from a **MEMBER** of the **FLORIDA BAR**.

### **IV. PATTERN OF DISPUTED SWORN STATEMENTS / ADDITIONAL CONTEXT**

This matter arose within broader domestic litigation involving materially Disputed **SWORN** Allegations, Credibility Determinations, and Significant Procedural **FAIRNESS CONCERNS** affecting our client.

In a related Bifurcation Proceeding, Relief was Granted after our client was DENIED THE OPPORTUNITY TO TESTIFY OR PRESENT EVIDENCE, Denied the Opportunity to Testify or Present Evidence. That matter is presently on **APPEAL** before the Florida Fifth District Court of Appeal, Case No. [REDACTED].

We Reference that Pending Appeal only as limited context Demonstrating the Seriousness of Ongoing **DUE PROCESS** concerns and the Need for Independent Review where **SWORN** Factual Assertions Carry Substantial Legal Consequences.

We further note that this matter **DOES NOT** Appear Isolated and is Consistent with a Broader **PATTERN** of Disputed **SWORN FACTUAL CLAIMS** Used to Obtain Litigation Advantage.

## **V. HEIGHTENED PROFESSIONAL RESPONSIBILITY**

Ms. Nunez-Navarro is **NOT** an **INEXPERIENCED LITIGANT**. She is:

- Current **DEAN** of a St. Thomas School of Law in Miami, Florida;
- Former Circuit Court **JUDGE**; and
- A person Occupying Public-Trust and Leadership roles in the Legal Community and Within the **Florida BAR**.

For that reason, Expectations of **HONESTY, RESTRAINT**, and **RESPECT** for the **JUDICIAL PROCESS** are Heightened.

## **VI. RULES IMPLICATED**

The conduct described appears to implicate, among others:

- **Rule 4-3.3(a)(1)** – Knowingly Making a False Statement of Material Fact to a Tribunal

- **Rule 4-8.4(c)** – Dishonesty, Fraud, Deceit, or Misrepresentation
- **Rule 4-8.4(d)** – Conduct Prejudicial to the Administration of Justice

**Additionally Implicated are Concerns Regarding Misuse of Verified Pleadings and Abuse of Contempt Process.**

## **VII. REQUESTED ACTION**

On behalf of our Client, we Respectfully request that **The Florida Bar:**

1. Investigate the Verified Contempt filing and related Conduct;
2. Determine whether Materially False Statements were Knowingly Made to the Tribunal;
3. Determine whether Contempt Remedies were Sought through False Factual Assertions;
4. Impose Discipline Deemed Appropriate; and
5. Take any Further Action Necessary to Preserve Confidence in the Legal Profession.

## **VIII. REQUEST FOR INDEPENDENT REVIEW**

Our client further Respectfully Requests that this Matter be Assigned for Independent review outside the [REDACTED] County legal community.

As Respondent has Longstanding Professional Relationships, Friends, Colleagues, and Institutional Connections throughout the [REDACTED] Legal Communities, and as our client has Prior Concerns that Standard Investigative Measures were NOT fully Followed in Connection with an Earlier **BAR** Complaint, Confidence in the Neutrality of **ANY** Review Requires Additional Separation from Local Influence.

Accordingly, we request that The Florida Bar consider assigning:

- An Investigator from outside [REDACTED] County;
- Bar Counsel from Tallahassee or Another Independent Office; or
- Any Reviewer without local Professional Ties to Ms. Nunez-Navarro.

This Request is made solely to Ensure Public Confidence, Impartial Fact-Finding, and Independent Verification of:

1. The Factual Statements set forth Herein;
2. The Circumstances Surrounding the Verified Contempt Filing; and
3. Whether Materially False **SWORN** Statements, including Potential **PERJURY**, were made.

Our Client seeks only a **FAIR** and **NEUTRAL** Review Process based on the evidence.

## **IX. SUPPORTING MATERIALS**

Attached or available upon request:

- Verified Motion for Contempt
- Verification / signature audit records
- Verified response contesting allegations
- Proof of possession / delivery of check
- Relevant docket entries and court orders
- Notice of Appeal / appellate docket (Case No. [REDACTED])
- Additional supporting records as requested

## **PART FOUR: Witnesses**

The following individuals may have relevant knowledge of the matters described in this complaint:



- Attorney Tarlika Nunez-Navarro (BAR #85175) — Transmitted Materially False Sworn Allegations to the Court.
- Attorney Matthew Benzion (BAR #84024) — Transmitted False Legal Documents to the Court on behalf of Tarlika Nunez-Navarro.
- Paralegal Christine Marinkovich — Created False Legal Documents to be Presented to the Court on behalf of Tarlika Nunez-Navarro.
- Attorney John Albert (BAR #0175617) — Counsel for Sean [REDACTED] in Marriage Dissolution.
- Paralegal Laurie Siddell — Currently in possession of Internal Revenue Service Refund Check in the amount of \$39,455 signed by Sean [REDACTED] in Compliance of Court Order.
- Additional supporting documentation and witnesses can be provided upon request.


Respectfully submitted,

Anthony J. Aloneftis, Esq.  
Accident & Injury Legal Center, P.A.  
2114 Flamingo Road, Suite 2329  
Pembroke Pines, Florida 33028  
AJA1Law@yahoo.com  
(786) 663-5137

Counsel for Sean [REDACTED]

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT  
IN AND FOR BREVARD COUNTY, FLORIDA

IN RE: THE MARRIAGE OF:  
TARLIKA NUNEZ NAVARRO,

CASE NO: 05-2025-DR-

FAMILY DIVISION

Petitioner/Former Wife,

v.

SEAN 

Respondent/Former Husband.

**PETITIONER/FORMER WIFE'S VERIFIED MOTION FOR CONTEMPT AND  
ENFORCEMENT AND OTHER RELIEF**

The Petitioner/Former Wife, TARLIKA NUNEZ NAVARRO ("Wife"), by and through the undersigned counsel, hereby files this Verified Motion for Contempt and Enforcement and Other Relief, and in support thereof states the following.

1. On November 4, 2025, the Wife filed a Motion to Compel Husband to Preserve Parties' Tax Refund.
2. The Wife's Motion alleged the following:
  - a. The parties cooperated to file their 2024 Joint Tax Return;
  - b. The parties were entitled to a refund of \$39,445.00;
  - c. The refund check was mailed to the former marital residence where the Husband solely resides.
  - d. The Husband ignored the Wife's requests to preserve the tax refund.
3. In no uncertain terms, the Motion requested that the Husband be compelled to preserve the refund.
4. The Wife's Motion to Compel Husband to Preserve Parties' Tax Refund was Granted when the Husband, through counsel, agreed to the Motion at a hearing which occurred on January 9, 2026.
5. On January 15, 2026, an Order Granting Wife's Motion to Compel Husband to Preserve Parties' Tax Refund was entered by this Court.
6. Pursuant to the Order entered on January 15, 2026, the parties' 2024 joint tax return refund in the approximate amount of \$39,445.00 was to be deposited into the Albert and

Donnelly, PLLC IOLTA account number ending \*9203 and not be disbursed to either party or lawyer in this action until further Order of this Court or written agreement of the parties.

7. The undersigned asked Husband's counsel multiple times to confirm that the Husband had delivered the tax refund funds to his counsel for deposit into the counsel's trust.

8. Husband's counsel has not confirmed that the funds have been received.

9. The Wife contacted the IRS and was provided confirmation that the tax return check in the amount of \$39,445.00 was sent to the Husband's residence, [REDACTED], and that the check has been cashed.

10. Based on this information and the Husband's conduct, it is apparent that the Husband has taken the parties' joint tax refund for himself and deliberately violated this Court's order.

11. The Husband's conduct is willful and intentional, and he should be held in contempt for his violation of the Order entered on January 15, 2026.

12. The Order entered on January 15, 2026, should be enforced and the Husband Ordered to pay a purge to the Wife for her half of the parties' tax return, or face incarceration.

13. The Wife has agreed to pay her attorney a reasonable fee for the services provided in this matter. This motion would not have been necessary but for the Husband's contemptuous and wrongful conduct. As such, the Husband should be responsible for the attorney's fees and costs incurred in connection with this motion and the litigation pertaining thereto.

WHEREFORE, Counsel for the Petitioner/Former Wife, TARLIKA NUNEZ NAVARRO, respectfully requests that this Honorable Court enter an Order GRANTING the herein motion; Enforcing the Order Granting Wife's Motion to Compel Husband to Preserve Parties' Tax Refund, Holding the Husband in contempt, Establishing a purge in the amount of \$39,445.00, providing for the issuance of a bench warrant if the purge is not satisfied, awarding the Wife attorney's fees, costs, and suit monies incurred in connection with this litigation to be paid by the Husband, and Awarding the Wife any other relief that this court deems just and proper.

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing will be sent via the Florida Court Efiling Portal to John J. Albert, Esq., 2755 N. Wickham Rd., Suite 103, Melbourne, FL 32935, [john@albertdonnellylaw.com](mailto:john@albertdonnellylaw.com), on this the 18th day of March, 2026.

BENZION LAW  
COUNSEL FOR PETITIONER  
4720 NW BOCA RATON BLVD, SUITE D106  
BOCA RATON, FL 33431  
(561) 306-5949  
mab@benzionlaw.com

By: /s/ Matthew Benzion  
Matthew Benzion, Esq.  
Fl. Bar No.: 84024

**VERIFICATION**

**Under penalties of perjury, I declare that I have read the foregoing Motion and that the facts stated in it are true.**



Tarlika Navarro (Mar 18, 2026 16:26:58 EDT)

---

TARLIKA NUNEZ NAVARRO






# 3.18.26 Motion for Enforcement and Contempt

Final Audit Report


2026-03-18

Created:	2026-03-18
By:	Christine Marinkovich (cm@benzionlaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAa6n6hYUvF2W-gXsr_HrjZHajTRds_B-d

## "3.18.26 Motion for Enforcement and Contempt" History

-  Document created by Christine Marinkovich (cm@benzionlaw.com)  
2026-03-18 - 8:09:09 PM GMT
-  Document emailed to Tarlika Navarro (tarlikanuneznavarro@gmail.com) for signature  
2026-03-18 - 8:09:13 PM GMT
-  Email viewed by Tarlika Navarro (tarlikanuneznavarro@gmail.com)  
2026-03-18 - 8:26:43 PM GMT
-  Document e-signed by Tarlika Navarro (tarlikanuneznavarro@gmail.com)  
Signature Date: 2026-03-18 - 8:26:58 PM GMT - Time Source: server
-  Agreement completed.  
2026-03-18 - 8:26:58 PM GMT

IN THE CIRCUIT COURT OF THE  
EIGHTEENTH JUDICIAL CIRCUIT  
IN AND FOR BREVARD COUNTY,  
FLORIDA

CASE NO: 05-2025-DR-

IN RE: The Marriage Of:

TARLIKA NUNEZ NAVARRO,

Petitioner,

v.

SEAN 

Respondent.

\_\_\_\_\_ /

**STIPULATED ORDER REGARDING PARTIES 2024 TAX REFUND**

**THIS CAUSE** came to be heard pursuant to the parties' stipulation as evidenced by the signatures of their respective counsel below. The Court reviewed the stipulation of counsel and the court file. As such, it is hereby:

**ORDERED AND ADJUDGED:**

1. On January 15, 2026, an Order Granting Petitioner/Wife's Motion to Compel Husband to Preserve Parties' Tax Refund was entered.
2. Pursuant to said Order, the parties' 2024 tax refund, in the amount of \$39,445.00, was to be deposited into the IOLTA with the law firm of Albert & Donnelly, attorney for the Respondent, and to remain in that account until further Order of the Court or written agreement of the parties.
3. The parties stipulate and agree that each party shall be entitled to one-half of the tax refund.
4. The IRS check is currently being held at the office of Albert & Donnelly. As soon as is practicable, both parties shall, separately, go to the office of Albert & Donnelly to sign the check so it may be deposited into the firm's IOLTA. Upon the check being deposited into the Albert & Donnelly account and clearing, each party will be entitled to

\$19,722.50. Albert & Donnelly shall draft a check to the Petitioner for her one-half, mailing said check to her attorney, Matthew Benzion.

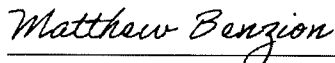
5. The Court retains jurisdiction over the parties and the subject matter for all lawful purposes.

**DONE AND ORDERED** this 27 day of March 2026 in Viera, Florida.

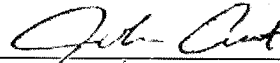


**JIGISA DOOKHOO**  
CIRCUIT JUDGE

Read & agreed to by:




**MATTHEW A. BENZION, ESQ.**  
Attorney for the Petitioner  
Florida Bar No.: 84024



**JOHN J. ALBERT, ESQ.**  
Attorney for the Respondent  
Florida Bar No.: 0175617

IN THE CIRCUIT COURT OF THE  
EIGHTEENTH JUDICIAL CIRCUIT  
IN AND FOR BREVARD COUNTY,  
FLORIDA.

CASE NO.: 05-2025-DR-

IN RE: The Marriage Of:

TARLIKA NUNEZ NAVARRO,

Petitioner,

v.

SEAN 

Respondent.

**RESPONDENT'S VERIFIED MOTION TO ADDRESS SWORN STATEMENT  
AND FOR APPROPRIATE RELIEF**

COMES NOW, the Respondent, SEAN  and states under oath:

1. In the Petitioner's Verified Motion for Contempt and Enforcement filed on March 18, 2026, the Petitioner states under oath that she contacted the IRS and was informed that the parties' 2024 tax refund check had been cashed.
2. At all relevant times, the tax refund check was in the possession of the Respondent.
3. The tax refund check was not cashed.
4. The tax refund check was preserved in compliance with this Court's January 15, 2026 Order.
5. The issue of the tax refund check has since been addressed by Order of this Court entered on March 27, 2026.
6. The sworn statement referenced above is inconsistent with the facts set forth herein.
7. The effect of this sworn statement was to portray the Respondent as having wrongfully taken and cashed the parties' tax refund and to support a request for



contempt and enforcement remedies, including potential involvement of law enforcement.


8. The Petitioner is a former judge and current law school dean, and the accuracy of sworn statements made under such circumstances carries heightened importance.

9. Based on the foregoing, the Respondent will be submitting a complaint to the Florida Bar for review of the sworn statements made in the Petitioner Verified Motion and their compliance with applicable professional and ethical obligations.

**WHEREFORE**, based upon the foregoing, the Respondent respectfully requests this Court:

- A. Take notice of the above facts;
- B. Make findings as to the accuracy of the sworn statement contained in the Petitioner's Verified Motion;
- C. Refer this matter to the Florida Bar for review of the sworn statements made under oath;
- D. Award the Respondent his reasonable attorney's fees and costs incurred as result of the filing of the Verified Motion and the necessity of addressing the sworn statements contained therein;
- E. Any further relief that the Court deems just and proper.

I, SEAN [REDACTED] declare under penalty of perjury that the foregoing facts are true and correct to the best of my knowledge.

  
SEAN [REDACTED]  
STATE OF FLORIDA  
COUNTY OF BREVARD

Sworn to or affirmed and signed by me on this 3<sup>rd</sup> day of April, 2026, by SEAN [REDACTED] who swore to the truthfulness of the contents herein.

  
NOTARY PUBLIC- STATE OF FLORIDA



**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished via E-Service Matthew Benzion, Esq. at mab@benzionlaw.com on this 3<sup>rd</sup> day of April 2026.

  
**JOHN J. ALBERT, ESQ.**  
Attorney for the Respondent  
**ALBERT & DONNELLY, LLC**  
2755 N. Wickham Road, Suite 103  
Melbourne, Florida 32935  
(321) 777-1110  
Florida Bar No.: 0175617  
john@albertdonnellylaw.com