IN THE CIRCUIT/COUNTY COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
SMALL CLAIMS DIVISION

MIGUEL ANGEL MORA,
Defendant / Counter-Plaintiff,

Case Number: 25-CC-032407

v.

Division: N

GHADA MAGHREBI,
Plaintiff / Counter-Defendant.

COUNTERCLAIM

Defendant / Counter-Plaintiff sues the Plaintiff / Counter-Defendant for damages which do not exceed $8,000.00 exclusive of interest, costs, and attorney's fees for **private nuisance (civil tort)**, and alleges:

1. Counter-Plaintiff resides at [redacted], Tampa, Florida.

2. Since November 2024, Counter-Defendant has engaged in a continuing course of conduct interfering with Counter-Plaintiff's use and enjoyment of his property.

3. Such conduct has included, but is not limited to:
   a. Playing amplified music at unreasonably high volume and engaging in unreasonably loud shouting and disorderly noise, often while intoxicated, at all times of day and night;
   b. Harassing Counter-Plaintiff and his wife by repeatedly shouting threats and menacing statements toward them, both during the day and late at night;
   c. Making defamatory accusations and suggestions about Counter-Plaintiff aloud from her yard and in posts to neighborhood social media platforms, including Facebook and Nextdoor;
   d. Filing false police reports against Counter-Plaintiff;
   e. Knowingly filing false Code Enforcement complaints against Counter-Plaintiff's property;
   f. Filing perjurious petitions for restraining orders against Counter-Plaintiff in an effort to force him to move out of his home;
   g. Climbing Counter-Plaintiff's six-foot boundary fence and trespassing onto his property;
   h. Stealing personal property from Counter-Plaintiff's yard; and
   i. Illegally mounting surveillance cameras onto Counter-Plaintiff's fence without permission.

4. This repeated conduct constitutes a private nuisance, substantially and unreasonably interfering with Counter-Plaintiff's use and enjoyment of his property.

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5. As a direct and proximate result, Counter-Plaintiff has suffered damages in the form of diminished rental value of his property for the period of November 2024 to present in the amount of $8,000.00, which also encompasses reasonable incidental costs incurred for noise mitigation and enhanced home security necessitated by Counter-Defendant's conduct.

6. Condensed Timeline of Nuisance Conduct (Not Exhaustive) is attached as Exhibit A and incorporated herein by reference.

WHEREFORE, Counter-Plaintiff demands judgment against Counter-Defendant for $8,000.00 in damages, plus costs, and for such further relief as this Court deems just and proper.

Respectfully submitted,
Date: August 20, 2025

Certificate of Service
I HEREBY CERTIFY that a true and correct copy of the foregoing *Counterclaim* was served upon Ghada Maghrebi at [redacted], Tampa, FL 33629, via Certified Mail on this 20th day of August, 2025.

/s/ Miguel Angel Mora
Miguel Angel Mora
[redacted]
Tampa, FL 33629
[redacted]
Defendant / Counter-Plaintiff, pro se

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Exhibit A: Condensed Timeline of Nuisance Conduct (Not Exhaustive)

Date	Event (representative examples)	CAD
11/17/24	I moved into [redacted], Tampa FL 33629; repeated nighttime noise disturbances from next-door neighbor Ghada began immediately.	
12/25/24	Family awakened at 2:15AM by extremely loud, sexually explicit conversation in Ghada's side yard.	
1/7/25	Delivered letter to Ghada citing Tampa Code §14-157 (noise and nuisance ordinance), **co-signed by four neighbors**.	
2/22/25	**Unreasonably loud music** played all day into night; at least three police responses; Ghada shouted **explicit taunts** after officers left.	25-105704, 25-106006, 25-106119
2/25/25	Ghada filed **false theft report** against me regarding cameras she illegally mounted on my fence; I returned cameras anyway. Ghada's tenants **dumped trash in my yard**.	25-112622
2/26/25	I installed three cameras on my fence per TPD advice; Ghada made **false trespassing report**; Ghada's tenants **threatened to kill me**.	25-114566, 25-114567, 25-115272
2/27/25	Ghada made **defamatory posts on Nextdoor and Facebook** insinuating I have security cameras because I'm a "pervert" and want to watch her undress.	
3/2/25	**Ghada found unconscious in her yard with unreasonably loud music playing**, "can hear it down the block" according to TPD.	25-120624, 25-123398, 25-123501
3/9/25	Police again found **Ghada unconscious in her yard with unreasonably loud music playing**.	25-138248
3/19-3/20	**Unreasonably loud music played from 8:54 PM–5:15 AM**; music audible 100+ feet away and inside my bedroom, according to TPD; Ghada harassed me from sidewalk; **shouted defamatory accusations of pedophilia, drug trafficking, adultery and more**.	25-159556, 25-159426, 25-159815, 25-161609, 25-161356, 25-159981, 25-159915
3/21-3/23	Ghada and her tenants/roommates played unreasonably loud music the entire weekend and shouted obscenities and taunts.	25-165797, 25-163926
3/30/25	AM: loud music & threats; PM: Ghada climbed my fence and filed false assault/battery report; **trespass warning issued to Ghada (TPD)**	25-181419, 25-182291, 25-182492
4/2-4/29	Multiple late-night disturbances; drunk and disorderly conduct; harassed me from sidewalk; **Ghada found unconscious in yard with unreasonably loud music playing on several late nights and early mornings**.	25-187926, 25-189851, 25-198557, 25-198464, 25-204866, 25-221820, 25-243120
5/1/25	Ghada filed two perjurious restraining order petitions (25-DR-005814 & 25-DR-005815) against me (dismissed on 8/4/25).	

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Exhibit A: Condensed Timeline of Nuisance Conduct (Not Exhaustive)

5/11-5/12	Unreasonably loud music; Ghada **trespassed repeatedly and was filmed stealing my security camera**; I filed police report 5/12 and sworn prosecution request 5/23.	25-268342, 25-269805
5/23/25	Ghada **harassed my wife and me from sidewalk**.	
7/22-7/30	Ghada filed two **false Code-Enforcement complaints**; 7/30 inspection found no violations.	
8/2-8/3	Aug 2: **intoxicated disturbances, unreasonably loud music, fence climbing**, 10 PM creeping at side of my house; Aug 3: unreasonably loud, drunken pool party.	
8/4/25	Both of Ghada's perjurious injunction petitions were dismissed.	
8/13/25	Unreasonably loud music and **domestic disturbance between Ghada and her fugitive ex-husband** who she was harboring. In retaliation against me for calling the police, Ghada called the police that night to file a false disturbance complaint against me.	25-457466, 25-458637
8/15-8/17	**Ghada played unreasonably loud music throughout the weekend and harassed me from the sidewalk** in retaliation after her fugitive ex-husband was apprehended on 8/15.	

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