IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
IN AND FOR LEE COUNTY, FLORIDA

VINCENT MICHAEL HYLER,
Petitioner,
v.
CARLI MICHELLE HELLER,
Respondent.
_____/

Case No. 26-DR-005826

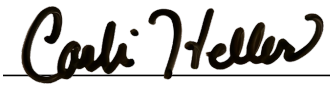
RESPONDENT'S CERTIFICATE OF COMPLIANCE WITH SECTION 57.105(4), FLORIDA STATUTES

(filed with Respondent's Motion for Sanctions under section 57.105, served October 13, 2026)

Carli Michelle Heller, Respondent, self-represented, certifies:

1. On October 13, 2026, at 5:07 p.m. (Eastern), Respondent served the attached Motion for Sanctions under section 57.105, Florida Statutes, on counsel for Petitioner, Carrington M. Mead, Esq., Salmon, Salmon, Labbe, Dehne, P.A., by e-mail to cmead@salmon-salmon.com, courtdocs@salmon-salmon.com and djean@salmon-salmon.com, with a copy to Petitioner's California counsel, Kali S. Perkins, Esq. (kali@perkins-familylaw.com). The e-mail was titled "Hyler v. Heller, No. 26-DR-005826 — Respondent's Motion for Sanctions under § 57.105, served under § 57.105(4), not filed," and the motion was attached as a PDF. The motion was served and not filed, as section 57.105(4) requires.
2. Twenty-one days after service ended on Tuesday, November 3, 2026. Within that period, Petitioner did not withdraw or appropriately correct the application of August 17, 2026 and the filings the motion challenges, and no notice of withdrawal or correction was served on Respondent.
3. The motion is therefore filed today, after the expiration of the twenty-one-day period, as served, with this certificate.

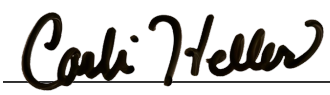
Dated: November 6, 2026



Carli Michelle Heller, Respondent, self-represented
Service email (Portal): hellercwp@gmail.com · Email: cjj.heller@gmail.com · (239) 382-0668
Address confidential (Fla. R. Gen. Prac. & Jud. Admin. 2.420)

CERTIFICATE OF SERVICE

I certify that on November 6, 2026 this certificate and the motion were filed through the Florida Courts E-Filing Portal and served by the Portal's e-service on Carrington M. Mead, Esq. (cmead@salmon-salmon.com; djean@salmon-salmon.com; courtdocs@salmon-salmon.com), counsel for Petitioner.



Carli Michelle Heller

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VINCENT MICHAEL HYLER,
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_____/

Case No. 26-DR-005826
Division: Domestic Relations – "C"

RESPONDENT'S MOTION FOR SANCTIONS UNDER SECTION 57.105, FLORIDA STATUTES, AGAINST PETITIONER AND HIS COUNSEL

(Served October 13, 2026 under § 57.105(4). Not to be filed before November 3, 2026.)

Carli Michelle Heller, self-represented, serves this motion under section 57.105(4), Florida Statutes. It will not be filed with or presented to the Court unless, within 21 days after service, the two matters identified below are withdrawn or appropriately corrected. If they are not, Respondent will file it and ask that it be heard with her pending motions.

I. The two matters challenged

1. **The firearm allegation.** Petitioner's verified petition for registration and expedited enforcement, and his application for the warrant that issued August 19, 2026, were filed by his counsel, Carrington Mead, with Petitioner's California declaration of August 12, 2026 (court file pp. 13–16). Paragraph 12.A of that declaration states: "I surrendered the firearm referenced in the 2025 directive, Carli's July 5 declaration asserts this directive remains uncured; that is false." The declaration offers one document as proof, its Exhibit F, the Receipt for Firearms (form DV-800) dated April 15, 2025, which counsel also filed in this Court (court file pp. 68–70). The receipt lists two rifles, a Winchester 70 and a Mauser M12, and at item 7 answers "No" to whether Petitioner has or owns any other firearm. The firearm Respondent identified, a Remington shotgun that came into Petitioner's household in December 2024, is not on it. The allegation is contradicted by the exhibit filed to prove it. Respondent's message of December 2, 2024 and her messages of April 22, 2025, the morning she read the receipt, are at Exhibit G to her

Notice of Violation and Motion filed October 12, 2026, together with the declaration and the receipt.

2. **The claim to enforce an order that has ended.** The warrant of August 19, 2026 provides at ¶ 16 that it expires upon the expiration of the California order of August 12, 2026 at the September 2, 2026 hearing "unless proof of a written extension is presented." The California order expired by its printed terms on September 2, 2026. The Mendocino County clerk's Docket & Minutes of September 2, 2026 record no extension. No written extension has been presented to this Court, and none exists. (Exhibits A and H to the Notice of Violation and Motion.) Petitioner has nonetheless maintained in this Court, without withdrawal or correction, his claim that the August 12, 2026 order is registered and enforceable in Florida and that his retention of the child outside Florida rests on this Court's orders. Since September 2, 2026, that claim has had no order under it. The only custody determination now registered in this Court is Respondent's order of February 11, 2026 awarding her sole physical custody (Case No. 26-DR-006457; notice served September 26, 2026; uncontested; enforceable as of registration under § 61.528(3)(a) and confirmed by operation of law under § 61.528(5) on October 16, 2026).

II. Why section 57.105 applies

3. Section 57.105(1) requires sanctions, in equal amounts against the losing party and the losing party's attorney, when the court finds that either "knew or should have known that a claim or defense when initially presented to the court or at any time before trial" was "not supported by the material facts necessary to establish the claim or defense" or "would not be supported by the application of then-existing law to those material facts." Subsection (4) requires that the motion be served 21 days before it is filed so that "the challenged paper, claim, defense, contention, allegation, or denial" can be withdrawn or corrected first.

4. The firearm allegation was unsupported when presented. The document attached to prove it disproves it. No fact outside counsel's own filing is needed to see this; it requires reading the receipt at pp. 68–70 against the sentence at p. 15. Counsel was told in writing by August 27, 2026 that Respondent alleged noncompliance with the surrender directive; his letter of that date (Exhibit D to the Notice of Violation) answers that "Vincent denies those allegations." A denial is not an inquiry. The exception in § 57.105(3)(b) for an

attorney who acted in good faith on the client's representations does not reach a representation contradicted by the exhibit the attorney himself filed with it.

5. The enforcement claim stopped being supported by then-existing law applied to the material facts on September 2, 2026, by the warrant's own ¶ 16. A claim may be presented in good faith and later lose its basis; § 57.105(1) reaches the claim "at any time before trial," and the obligation after that point is to withdraw it. Six weeks have passed. The claim has been neither withdrawn nor corrected, and a two-year-old remains outside this State on the strength of it.

6. Separately, Rule 4-3.3 of the Rules Regulating The Florida Bar requires a lawyer who comes to know that material evidence the lawyer offered is false to take reasonable remedial measures, including, if necessary, disclosure to the tribunal. This motion, with the receipt, is that knowledge if the letter of August 27 was not.

III. What an appropriate correction would be

7. For the firearm allegation: a notice filed in this Court withdrawing ¶ 12.A of the August 12, 2026 declaration, and stating which firearms Petitioner surrendered, to whom, and when, including the Remington shotgun or an explanation of its absence from the receipt.

8. For the enforcement claim: a notice filed in this Court acknowledging that the warrant of August 19, 2026 expired under its ¶ 16 on September 2, 2026 and that no written extension of the California order of August 12, 2026 exists, and withdrawing any claim that Petitioner's retention of the child outside Florida rests on an order of this Court.

IV. Relief

9. If the matters above are not withdrawn or corrected within 21 days, Respondent will file this motion and ask that the Court:

a. find under § 57.105(1) that the firearm allegation was not supported by the material facts when presented, and that the enforcement claim has not been supported by then-existing law applied to the material facts since September 2, 2026;

b. direct that ¶ 12.A of the August 12, 2026 declaration be stricken and not considered for any purpose in this Court;

c. impose sanctions under § 57.105(1) in equal amounts against Petitioner and his counsel, in such amount as the Court determines, with any amount payable to Respondent, who is self-represented, measured by her reasonable costs and expenses rather than attorney's fees;

d. award Respondent her reasonable expenses under § 57.105(2) and § 61.538 for the delay the uncorrected claim has caused in the enforcement of the registered determination; and

e. grant such further relief as is just, including any referral the Court considers appropriate.

VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing motion and that the facts stated in it are true. § 92.525, Fla. Stat.



Carli Michelle Heller
Dated: October 13, 2026

Respectfully submitted,



Carli Michelle Heller, Respondent, self-represented
[Address confidential under § 119.071]
Service email (Portal): hellercwp@gmail.com
Email: cjj.heller@gmail.com
Telephone: (239) 382-0668 · (410) 507-8198
Dated: October 13, 2026

CERTIFICATE OF SERVICE

I certify that on October 13, 2026 this motion was served by e-mail under Rule 2.516, Fla. R. Gen. Prac. & Jud. Admin., on Carrington Mead, Esq., Salmon, Salmon, Labbe, Dehne, P.A. (cmead@salmon-salmon.com; courtdocs@salmon-salmon.com; djean@salmon-salmon.com), counsel for Petitioner, and by e-mail on Kali Perkins, Esq., Perkins Family Law, PC (kali@perkins-familylaw.com). Under § 57.105(4), it was served and not filed.



Carli Michelle Heller