

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

JOHN DOE,

CASE NO.:

Plaintiff,

v.

AMY TRIPP, STEVE TRIPP, and SUSAN
TRIPP,

Defendants.

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

1. John Doe was recently confirmed as an official in the United States Department of Defense. Prior to John Doe being senate confirmed and sworn into his new position, Defendant Amy Tripp (“Ms. Tripp”) had been conducting a sustained campaign of harassment of John Doe and his wife. In late June, she threatened his marriage, threatened to and did publicly defame him to his new employer and high-ranking senate officials, and intentionally caused him emotional distress by putting him in the Hobson’s choice between his reputation or career and his marriage.

2. John Doe made it clear to Ms. Tripp that what she was doing was causing significant emotional distress to all involved. John Doe and his wife made it clear that her threats were defamatory. John Doe and his wife implored her to stop this behavior, or it would lead to litigation that would not be beneficial to anyone involved as John Doe needed to protect himself and his marriage. Nevertheless, Ms. Tripp persisted with her reign of terror.

3. Ms. Tripp utilized her parents, Stephen Tripp (“Mr. Tripp”) and Susan Tripp (“Mrs. Tripp”) to aid her and abet her in her harassment of John Doe. Amy Tripp consulted with her father, Stephen Tripp who advised her to increase her extortionate demands to John Doe from \$20,000 to \$25,000 for removal of defamatory information from X. Amy Tripp used both Stephen Tripp and Susan Tripp’s phones to avoid being blocked or unanswered by John Doe and to create

a multi-front attack on John Doe. Ms. Tripp acknowledged that both of her parents were involved in the extortion scheme, saying, “They know why I asked for their phone...” when making extortionate demands. She also texted her friend, “My Dr. is telling me how to get \$25k out of (John Doe). I’m getting something.” In the same timeframe, she also discussed with Mr. Tripp whether it is “worth it” to destroy John Doe’s career, presumably attempting to determine the amount to extort from him.

4. Amy Tripp escalated her threats from lies to destroy John Doe’s career, to ceaseless harassing phone calls, and threats of violence against John Doe’s wife. John Doe had no choice but to file this lawsuit and seek relief from the Court.

BACKGROUND

5. John Doe met Ms. Tripp in or around April 2024.

6. Ms. Tripp is a well-known social media personality with a focus on astrology. Ms. Tripp’s astrology business’s X profile has over 123,000 followers and makes multiple posts daily, which get significant public interaction.

7. John Doe is a former military official. In May 2024, this official was in the process of writing a book and was consulting regarding astrological beliefs and related issues. In that position, John Doe met Ms. Tripp.

8. John Doe and Ms. Tripp met on a dating app when John Doe and his wife were struggling in their relationship. John Doe and Ms. Tripp’s relationship became both a sexual and business relationship.

9. In addition to the personal relationship between John Doe and Ms. Tripp, they also came to a written consulting agreement (through their respective entities). John Doe saw potential in Ms. Tripp’s astrology business with the total addressable market being approximately \$7-\$10B in 2024 according to Grok and ChatGPT. John Doe also was interested in Ms. Tripp’s ability to

advise him on a character in one of his novels. Because of this nexus, John Doe agreed to invest in Starheal, LLC in exchange for an equity interest of 5%.

10. The relationship between John Doe and Ms. Tripp, while not without some drama, was relatively stable between May 2024 and the end of June 2025. During that time, John Doe and Ms. Tripp were having a casual sexual relationship as well as a professional relationship regarding the astrology business.

11. However, in June 2025 two things happened that caused the situation to change drastically. First, John Doe was appointed to a position in the Department of Defense and Ms. Tripp believed his senate confirmation was imminent; and second, John Doe and his wife reconciled, ending the relationship between John Doe and Ms. Tripp.

12. Due to these two issues, Ms. Tripp felt as though she was no longer going to be a part of John Doe's life and began lashing out. This included threats that she would use her massive social media platform to post knowingly false information to her followers about John Doe and his wife, repeated phone calls (as many as 30 in less than an hour), and eventually detailed threats of violence.

13. John Doe did everything in his power to stop this situation, but he has been powerless to stop Ms. Tripp's and others' campaign of harassment against John Doe and his family.

June 2025: The Threats Begin and Defamatory Posts are Made

14. In June 2025, Ms. Tripp informed John Doe that the astrological signs told her that John Doe's confirmation to his position in the Department of Defense was imminent.

15. Additionally, on June 23, 2025, John Doe texted Ms. Tripp, saying in pertinent part: "[O]ur relationship is unequivocally over. I love my wife and intend to attempt to repair the

relationship.”

16. A person, who is believed to be Ms. Tripp using Mr. Stephen Tripp’s phone to deceive John Doe, began texting John Doe’s wife threatening that she would be filing a false police report against John Doe. She also said, “He won’t get confirmed. He’s cooked.” And, “I just told the White House. You want to be next? You have skeletons in your closet. I will expose you and call your job and tell them you stole money.” And, “You’re both cooked for fucking with me.”

17. The person believed to be Ms. Tripp but who identified herself as “Rachel” to John Doe’s wife also told her that she would call John Doe’s wife’s job and tell them that she stole money.

18. John Doe’s wife did not steal money from her job and Ms. Tripp either knows this statement is false or is otherwise acting with reckless disregard for its truth.

19. In fact, when John Doe’s wife responded, “I’ve never stolen money,” Ms. Tripp made it clear that she does not care and would send a tweet anyway because John Doe’s wife is not on Twitter (now X).

20. The next day, June 24, 2025, Ms. Tripp began threatening John Doe directly. Ms. Tripp threatened that she would tweet knowingly false information and tag multiple public officials, based on her belief that John Doe’s confirmation was imminent.

21. Ms. Tripp said “[i]f you don’t want the tweet to go up Venmo might help[.]” John Doe did not acquiesce, believing this was just an attempt from Ms. Tripp to get attention and not a real attempt to have John Doe send her money.

22. Ms. Tripp then stated “I’m tweeting it now and I’m adding your wife’s name/I’m telling everything and tagging everyone.”

23. Still, while John Doe was concerned, he did not believe the threats.

24. Still lashing out, Ms. Tripp then threatened that she would publicize that John Doe had committed a disgusting sexual crime against her.

25. When John Doe responded, that's not true, Ms. Tripp said "well it's getting put in the record." And "[y]our name is fucking over[.]"

26. Ms. Tripp then showed her intent in making these knowingly false statements, saying "You won't get confirmed I hope that was worth it for you[.]"

27. Ms. Tripp then made another threat of making a false police report saying, "I'm going to the police/I'm calling the rape crisis center."

28. Eventually, Ms. Tripp made a specific demand of \$20,000. She then stated she was speaking to her father, Mr. Stephen Tripp, and immediately thereafter demanded \$25,000.

29. Due to the increased demand following Mr. Tripp's phone call with Ms. Amy Tripp, upon information and belief, Mr. Tripp advised Ms. Tripp to increase her extortionate demand.

30. Following this increased demand, John Doe asked what he gets for \$25,000. Ms. Tripp responded, "my word."

31. Ms. Tripp has since made a sworn, notarized statement claiming, "Any sexual contact between [John Doe] and me was consensual."

32. However, despite the truth, Ms. Tripp continued her threats and her intentional infliction of emotional distress.

33. Instead of using her social media platform, Ms. Tripp threatened that she would file a lawsuit. John Doe, an Afghanistan combat veteran diagnosed with PTSD, responded saying "what do you want from me?" Ms. Tripp revealed her violent intent and stated, "kill yourself/please get your gun and put it in your mouth and pull the trigger." She also stated she had

already called the rape crisis and asked what to do, despite her knowing and later confessing that such allegations were a lie.

34. Ms. Tripp then put out another false social media post on X. Ms. Tripp publicly outed John Doe as engaging in adultery but stated she did not know he was married. In fact, Ms. Tripp has since signed a sworn statement that since the beginning of her relationship, she knew he was married.

35. The lie about John Doe having concealed his marriage was done intentionally to portray John Doe as being untrustworthy and lacking moral character. All the while, Ms. Tripp knew the truth: That John Doe was having trouble in his marriage when he and Ms. Tripp began their relationship and John Doe and his wife had since attempted to reconcile.

36. Still, the damage that was done was not enough, Ms. Tripp continued and told John Doe “I’m putting another tweet up and tagging Newsmax and some of the armed services committee senators.... If your wife doesn’t apologize for being a cunt.”

37. Ms. Tripp followed through with this threat. Ms. Tripp made an X post about John Doe’s wife that identified her and said, “she is a felon...guilty of white collar crime.”

38. This tweet was untrue, and Ms. Tripp knew it was untrue or otherwise acted with reckless disregard for the truth.

39. John Doe informed Ms. Tripp that this is defamation and he would be speaking to a leading defamation attorney. Ms. Tripp responded violently once again. This time, she stated “[i]f your wife texts me again she’s going to be picking her teeth up/Pass it on[.]”

40. Ms. Tripp had followed through with several threats. At this point, John Doe was not only worried about his family life and his career, but he was also worried about his and his family’s physical safety. Ms. Tripp had made it clear that her intent was for John Doe and his

family to be in immediate fear for their lives and safety.

41. John Doe knew that he had to quietly move his family from Palm Beach to another location when Ms. Tripp texted, “I’m coming for you,” with a screenshot of a GPS map with his home address as she was driving. John Doe hired a private detective and determined that Ms. Tripp had a harassment and stalking judgment against her in Forsyth County, North Carolina and two dismissed criminal charges of stalking and harassment. In the judgment, the police noted that even after they notified Ms. Tripp of the complaint, she refused to stop. Upon learning this information, it was clear to John Doe and his wife that they were in danger.

Early July 2025: A slight de-escalation

42. Following the threatening activity at the end of June, Ms. Tripp began showing signs that she would not continue her threats, defamation, and intentional infliction of emotional distress.

43. On or about July 2, 2025, John Doe sent the following messages to Ms. Tripp:

- “[Ms. Tripp] you said that you would not contact [John Doe’s wife] again. Understand that this is over and please do not contact either one of us again. This is over. Please respect that.”; and
- “[Ms. Tripp] please stop posting on social media about my family and making false allegations of criminality. They are prepared to take legal action with one of the leading defamation attorneys in the country. Please stop.”

44. Ms. Tripp’s response made John Doe believe the threats and lies would stop. Ms. Tripp said specifically:

- “I understand”; and
- “I’m sorry for saying I was going to the police. It’s not true and I was upset.

I hate this happened and I'll respect you and stay out of your life.”

45. Additionally, on July 7, 2025, Ms. Tripp signed a document titled “Sworn Affidavit” that says the following:

(1) I met [John Doe] on April 15, 2024, with full knowledge he was married.

(2) Any sexual contact between [John Doe] and me was consensual.

46. That July 7, 2025 Sworn Affidavit was signed and notarized.

Mid July 2025: Confirmation and Escalation

47. Unfortunately, this de-escalation did not last long. John Doe and Ms. Tripp spoke or messaged sporadically from July 7, 2025, until Tuesday, July 15, 2025. During that time, Ms. Tripp again threatened John Doe and engaged in emotional manipulation to attempt to cause John Doe significant emotional distress.

48. Specifically, when John Doe did not immediately respond to a message, Ms. Tripp threatened to harm herself. When John Doe said, “don’t hurt yourself,” Ms. Tripp responded that she is “dying right now/I need to call an ambulance/Please tell my dad I love him[.]”

49. On July 15, 2025, the U.S. Senate confirmed John Doe for the position within the Department of Defense.

50. Following the confirmation, John Doe became extremely busy with the whirlwind of being sworn into the position.

51. Because he was unable to constantly monitor his phone, John Doe could not respond to Ms. Tripp’s messages. This caused Ms. Tripp to escalate her cyberharassment and her threats of violence against both John Doe and his wife.

52. Between July 18 and July 20, 2025, Ms. Tripp called John Doe through applications more than 100 times. For example, on Friday, July 18, 2025, Ms. Tripp called John Doe 15 times

between 2:50pm and 3:40pm.

53. On the night of July 19, 2025 to the early hours of July 20, 2025, Ms. Tripp sent hundreds of text messages and called John Doe and his wife after midnight dozens of times. Thankfully, John Doe had moved to a secure location that was not his primary residence.

54. During these conversations, Ms. Tripp threatened that she would “beat the shit” out of John Doe’s wife, that she was going to ruin both of John Doe and John Doe’s wife’s lives, and that they needed to “watch our backs.”

55. John Doe caused cease and desist letters to be sent to Ms. Amy Tripp and Mr. Stephen Tripp to try and stop the harassment without having to resort to the Courts.

56. On July 20, 2025, after Ms. Tripp’s threats and endless calls, using Susan and Steven Tripp’s phones in addition to her own phone, caused John Doe and his wife to stay up all night, an exasperated John Doe asked “Why are you doing this?” Ms. Tripp’s response was not about any sort of sexual impropriety, felony, or other criminality she had threatened or otherwise posted about. Instead, she showed again, this is all because of her hurt feelings and said, “[because] you hate me.”

57. Hurt feelings is not a basis to cause the emotional distress Ms. Tripp has caused in John Doe, nor is it a basis for the defamatory messages Ms. Tripp had posted on and texted.

58. On July 24, 2025, Ms. Tripp posted on X disclosing John Doe’s wife’s name, the location where she worked, and false statements about John Doe’s wife. The sole purpose of this message was harassment. Both harassing John Doe’s wife by having her followers continuously make incendiary remarks using John Doe’s wife’s images and harassing by making John Doe’s wife fear for her job.

59. Following this post, Ms. Tripp’s followers have followed through and posted John

Doe's wife's image and promoting "Starheal's" messages, causing a piling on effect that was intended by Ms. Tripp.

60. In August, Ms. Tripp continued to use Mr. Tripp and Mrs. Tripp's telephones to contact John Doe and his wife, and John Doe was forced to seek and obtain a temporary restraining order against Ms. Tripp, which was issued on August 7, 2025.

61. By this point, Ms. Tripp and her followers knew John Doe and his wife's name, their professions, and their images.

62. Ms. Tripp started using her followers to deliver her inflictions of emotional distress. One such follower uses the handle "Tiramisu for Two." Ms. Tripp has caused Tiramisu for Two to delete inflammatory posts about John Doe in the past, indicating control of this account. In effect, she used this account to avoid the appearance of personal involvement yet later confirmed to John Doe that she was able to manage that account.

63. On August 1, 2025, Ms. Tripp posted "mindfucking is abuse." Then her controlled account "Tiramisu for Two" posted a comment to that initial post with what appears to be a ChatGPT response about John Doe that contains his name, his company, and other information. Ms. Tripp re-posted that comment so it would appear on her page directly. Since the TRO was issued, Ms. Tripp has used her X account to continue to threaten and harass John Doe and his wife, including making defamatory claims, implying that John Doe and his wife have committed crimes.

64. The purpose behind these posts is to harass John Doe and his wife and cause them to constantly live in fear about what she or her supporters might do next. With that goal in mind, Ms. Tripp has been successful.

65. The threats must end and Ms. Tripp, Stephen Tripp, and Susan Tripp must be held responsible.

THE PARTIES

66. John Doe is *sui juris*, a citizen of Florida and resides in Palm Beach County, Florida.

67. Ms. Tripp is *sui juris*, a citizen of Florida and resides in Palm Beach County, Florida.

68. Mr. Stephen Tripp is *sui juris*, a citizen of North Carolina and resides in Ayden County, North Carolina.

69. Mrs. Susan Tripp is *sui juris*, a citizen of North Carolina and resides in Ayden County, North Carolina.

JURISDICTION AND VENUE

70. This is a civil controversy that exceeds the sum or value of \$50,000, exclusive of interest and costs.

71. This Court has subject matter jurisdiction over this action due to the amount in controversy.

72. Venue is proper in this district as a substantial part of the events or omissions giving rise to the claims, concern torts or other events that occurred in this district.

73. This Court has general personal jurisdiction over Ms. Tripp as she is a resident of Palm Beach County, Florida.

74. The Court has jurisdiction over Mr. Stephen Tripp and Mrs. Susan Tripp as they committed torts in the state of Florida including aiding and abetting Ms. Amy Tripp's intentional inflictions of emotional distress.

75. All conditions precedent for these claims have been met, satisfied, performed, or have been waived.

COUNT 1. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

76. John Doe re-states allegations 1-75 as if fully set forth herein.

77. Section 836.05, Florida Statutes, holds threats and extortion as a crime. The statute states, in pertinent part:

Whoever, either verbally or by a written or printed communication, maliciously threatens to accuse another of any crime or offense, or by such communication maliciously threatens an injury to the person, property or reputation of another, or maliciously threatens to expose another to disgrace, or to expose any secret affecting another, or to impute any deformity or lack of chastity to another, with intent thereby to extort money or any pecuniary advantage whatsoever, or with intent to compel the person so threatened, or any other person, to do any act or refrain from doing any act against his or her will, shall be guilty of a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

78. For the reasons and events presented in this pleading, Ms. Tripp, through verbal communication, text messages, and public posts on X, maliciously threatened injury to John Doe's reputation and they maliciously threatened to expose John Doe to disgrace and threatened to expose intimate secrets.

79. Ms. Tripp took these actions with an intent to extort John Doe with regard to his efforts to end the affair, move on with his life, and live happily with his wife.

80. Threats to cause mental or psychological injuries are generally prohibited under this extortion statute.

81. Neither the actual intent to do harm nor the ability to carry out the threat is essential to prove that extortion occurred. The extortion offense does not require that the extortionist intends, or even has the ability, to carry out his threat.

82. Ms. Tripp's and others' conduct was intentional and malicious. It was intentional as Ms. Tripp used this threat to serve her emotional interests and potentially financial interests; it

was a concerted and calculated stratagem and not an impulsive or off-the-cuff action. It was reckless under Florida's criminal extortion law as Ms. Tripp was using the threat of humiliation and harm to John Doe's reputation, career, and marriage, to assist in resolving her hurt feelings.

83. Ms. Tripp intended her behavior when she knew or should have known that emotional distress would likely result. Ms. Tripp's father was previously the mayor of a County in North Carolina and knew full well the difficulty faced by public servants such as John Doe.

84. Ms. Tripp's conduct was outrageous.

85. Ms. Tripp engaged in criminal conduct in violation of section 836.05, Florida Statutes, Florida's criminal extortion statute.

86. Ms. Tripp's conduct was also outrageous as it was intended to end John Doe's marriage.

87. This outrageous behavior impacted and harmed John Doe.

88. Ms. Tripp's conduct went beyond all bounds of decency and is odious and utterly intolerable in a civilized community.

89. Ms. Tripp's conduct caused John Doe emotional distress.

90. John Doe's emotional distress was severe.

COUNT 2. DEFAMATION PER SE

91. John Doe re-states allegations 1-75 as if fully set forth herein.

92. Ms. Tripp made false accusations of John Doe's lack of chastity, family criminality, and that John Doe had raped her, in the form of public posts on the social media platform X, text messages, and potentially other avenues ("False Statements").

93. Each of the False Statements state or imply one or more false, purportedly factual assertions.

94. Each of the False Statements is defamatory and was reasonably understood by the recipient to be stating that John Doe or his family was engaged in improper and/or illegal conduct.

95. Each of the False Statements was communicated by Ms. Tripp as a statement to third parties.

96. Ms. Tripp knew the False Statements were false or acted in reckless disregard of their truth or falsity, or at least acted negligently, when they communicated with members of the international public.

97. The False Statements expressly and/or by implication falsely accused John Doe of, *inter alia*: (i) engaging in severe criminal misconduct, (ii) engaging in a lack of chastity; (iii) having a familial history of crime; and (iv) engaging in other nefarious activities.

98. Ms. Tripp communicated her False Statements with express malice and improper motives, and with the primary purpose of injuring John Doe by using the false and defamatory nature of those False Statements to damage John Doe's standing and reputation in the community.

99. Ms. Tripp did not communicate the False Statements with a primary motive of furthering any common interests of the persons who learned of those False Statements.

100. The False Statements, on their face and as they would be reasonably understood by their recipients, tend to (i) accuse John Doe and his family of criminal conduct, (ii) subject John Doe to hatred, distrust, ridicule, contempt or disgrace, (iii) denigrate and injure John Doe in his business, and (iv) deter members of the local community from dealing with John Doe.

101. Accordingly, the False Statements are defamatory *per se*.

102. Because the False Statements are *per se* defamatory, John Doe is entitled to presumed damages.

103. Aside from the presumed damages to which John Doe is entitled, the False

Statements did in fact damage John Doe's reputation and goodwill.

104. As a direct and proximate cause of Ms. Tripp communicating the False Statements, John Doe has been and will continue to be damaged.

COUNT 3. INJUNCTIVE RELIEF

105. John Doe re-states allegations 1-104, inclusive of her Count 1 for intentional infliction of emotions distress and Count 2 for defamation, as if fully set forth herein.

106. John Doe seeks two forms of injunctive relief.

107. First, John Doe seeks prohibitory relief, barring Ms. Tripp from distributing, publishing, leaking, transferring, or otherwise conveying any false and defamatory information about John Doe or his family and ceasing any continued threats or extortive attempts.

108. Second, John Doe seeks mandatory relief, causing Ms. Tripp to disclose all known statements made as described herein, inclusive of electronic communication pertaining to John Doe or his family.

109. In proving these allegations, John Doe will establish a likelihood of success on the merits.

110. Irreparable harm would result in the absence of injunctive relief, as John Doe has no adequate remedy at law to redress the injury that would be caused should Ms. Tripp's endless publications or distributions of false and malicious information about John Doe or his family continue. Moreover, John Doe will presumptively suffer irreparable harm if Ms. Tripp is not required to halt her illegal activities, including using the threat of humiliation to intimidate and bully John Doe, a member of the Department of Defense.

111. The balance of hardships weighs strongly in John Doe's favor. Ms. Tripp has no legitimate interest in lying about John Doe or his family. John Doe – an appointed official – has

every right to privacy under the Florida constitution and applicable law. The continued threat of humiliation by Ms. Tripp imposes a continuing and terrible hardship on John Doe, who is entitled to this Court's protection against Ms. Tripp's threats.

112. The public interest is advanced by enforcing section 836.05, Florida Statutes, and halting any resumption of Ms. Tripp's extortion scheme. Against any person, this public interest would be advanced. The impact is even greater here, with John Doe a sitting member of the United States Department of Defense, against whom Ms. Tripp might – at any future time – choose to play their trump card in a misguided effort to intimidate John Doe. The public interest is served by halting Ms. Tripp's perpetration of extortion and intimidation and interfering with John Doe's efforts to live his life, advance his career, and protect his family.

**COUNT 4. AIDING AND ABETTING INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS**
(Against Stephen Tripp and Susan Tripp)

113. John Doe re-states allegations 1-90 as if fully set forth herein.

114. Stephen and Susan Tripp committed tortious activity by actively assisting Ms. Amy Tripp in her extortionate campaign, harassment, intentional inflictions of emotional distress, and defamation.

115. Mr. Stephen Tripp advised Ms. Amy Tripp to increase her extortionate demand from \$20,000 to \$25,000.

116. Both Mr. Stephen Tripp and Ms. Susan Tripp knowingly allowed Ms. Amy Tripp to use their cell phones to harass John Doe and his wife.

117. By using cell phone numbers other than Ms. Amy Tripp's cell phone, Mr. Stephen Tripp and Ms. Susan Tripp allowed Ms. Amy Tripp to create a multi-front harassment campaign where John Doe would not know who is contacting him, or who else may be reaching out next.

118. By using cell phone numbers other than Ms. Amy Tripp's cell phone, Mr. Stephen Tripp and Ms. Susan Tripp allowed Ms. Amy Tripp to avoid being "blocked" or "unanswered" by John Doe because he could not possibly know all the numbers with which Ms. Amy Tripp and her co-conspirators would attack him next.

119. Mr. Stephen Tripp and Ms. Susan Tripp knew that Ms. Amy Tripp's plan was a wrongful, unlawful, and tortious act.

120. Plaintiff has suffered damage due to the aiding and abetting of Mr. Stephen Tripp and Ms. Susan Tripp.

PRAYER FOR RELIEF

WHEREFORE, John Doe requests this Court grant relief in the following manner:

- a. Awarding John Doe all other monetary remedies available under Florida common law, including but not limited to, compensatory damages, attorneys' fees, costs and interest, against all defendants.
- b. Enjoining Ms. Tripp, with both prohibitory and mandatory relief as set forth in Count 3;
- c. Awarding John Doe special damages to include punitive damages under § 768.72, *Florida Statutes*.
- d. Granting any and all other relief that this Honorable Court deems just.

Dated this 22nd day of August, 2025.

Respectfully submitted,

/s/ Paul D. Turner

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