

**IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT IN
AND FOR ESCAMBIA COUNTY, FLORIDA**

ALBERT JACKSON JR.

Plaintiff,

Vs.

CASE#: 2023 CA 002304

**GEORGE GUTHRIE III
AND
PAULA THOMPSON RAPPE**

Defendants

_____ /

PLAINTIFFS THIRD AMENDED COMPLAINT

Plaintiff and pursuant to Fla. R. Civ. P. 1.190, hereby files this Third Amended Complaint against Defendants, GEORGE GUTHRIE III and PAULA THOMPSON RAPPE (formally Jane Doe Defendant), for libel/slander and/or defamation *per se*, negligence, negligent reporting and civil conspiracy, allege as follows:

Jurisdiction and Venue

1. This is a cause of action for monetary damages that exceed \$100,000.00, exclusive of interest, costs, and attorney's fees.
2. ALBERT JACKSON JR is, and was at all times relevant to the facts herein, and lives in Escambia County, Florida.
3. GEORGE GUTHRIE III is, and were at all times relevant to the facts herein, and last known address is 13830 Canal Drive 32507 in Escambia County, Florida.
4. PAULA THOMPSON RAPPE is, and were at all times relevant to the facts herein, and last known address is 13715 Unit B Canal Drive 32507 in Escambia County, Florida.
5. Venue is proper in Escambia County, Florida pursuant to Chapter 47, FL Statutes, because the cause of action alleged herein occurred in Escambia County, Florida.
6. This is an action for damages arising out of Defendant GEORGE GUTHRIE III (hereinafter “defendant Guthrie”) publication of false and

defamatory statements about Plaintiff's whereabouts and actions on or around August 10, 2021.

7. This action for damages arising out of Defendant PAULA THOMPSON RAPPE'S (hereinafter "Defendant Rappe") publication of false and defamatory statements about Plaintiff's whereabouts and actions on or around August 10, 2021. Defendant Rappe was previously an unknown Jane Doe in Plaintiff's original complaint. Due to Defendant Guthrie not participating in discovery and Escambia County Sheriff's Office (ECISO) not complying with Florida Chapter 119, Plaintiff did not identify her until recently.

8. On August 10, 2021 Albert Jackson Jr. (hereinafter Plaintiff) and his son CJ a minor child were making some roof repairs on our home located at 5811 Monterey Avenue Pensacola, Florida 32507. We had started around 8:30am.

9. While working on the roof I had seen and heard Defendant Guthrie letting his dog outside from the back porch which faces my house. At approximately 10:45am my son and I heard sirens, which we didn't think much of it because it was not uncommon to hear sirens as the fire department is just a few blocks down the street.

10. At that same time unbeknownst to us, the Warrington bank located at 13330 Sorrento road 32507 was robbed by an individual described by the victim and witnesses as having olive skin, Hispanic male, wearing a shoulder length black wig, dark sunglasses, long sleeved silver or gray shirt, denim pants and white shoes. At no point or time did me or my son have any matching clothing, vehicle or match the description of the suspect. The only Afro-American persons at the Warrington bank preceding the bank robbery was a teller, and the teller was female. Plaintiff and his son was never in the vicinity of the bank until after the robbery had occurred.

11. The suspect pistol whipped a bank employee (Corey Duane Bourgeois) and fled with roughly \$5000 cash. Under FL statute 812.13(2)(a), armed robbery is a first degree felony and a Federal Crime under title 18 U.S.C. § 2113.

12. Sometime before 1:08pm Defendant Rappe told Defendant Guthrie that I was the bank robber. The statement was made prior to the ECSO making contact with Plaintiff. Defendants Guthrie and Rappe had knowledge that Plaintiff was at his home when the bank was robbed but neglected to inform ECSO of that fact. Defendants Guthrie and Rappe

conspired together to spread the false accusations accusing Plaintiff of armed bank robbery to several individuals.

13. On August 10, 2021 at approximately 1:08pm Defendant Rappe calling from her cell phone made the following false oral statement to a KA Brown of the Escambia Sheriff's Office concerning Albert Jackson Jr (**Exhibit 6**) and a copy of her resume were she list her number used to call ECSO that was provided to Plaintiff by her employer, University of West Florida (**Exhibit 7**).

“I have a picture of someone I think could be the bank robbery suspect.”

14. Defendant Rappe published a picture of me, my wife and son to Deputy Nathaniel Weller implying that Plaintiff was the armed bank robber that committed the armed robbery of the Warrington bank.

15. The picture was taken on March 27, 2019 at 7:32pm, the picture does not depict anyone matching the description of the armed bank robbery suspect (**Exhibit 5**).

16. Defendants Rappe and Guthrie also made false statements to Doyle Gresham, Todd Glaze, Daniel Weller, Megan Matthews, Nathaniel Perry and Donald Griffin during their interviews implying that **“Plaintiff was the armed bank robbery suspect”** .

17. Defendant Rappe is the in-law of Defendant Guthrie, Her daughter is married to Defendant Guthrie's son.

18. Defendants Guthrie and Rappe made the statements knowing that those statements were false and with malicious intent. ECSO took Defendant Rappe's and Defendant Guthrie's statements as fact and acted directly on the false information given to them by Defendant Rappe and Defendant Guthrie.

19. Defendant Guthrie admits to seeing me on my roof during the time of the bank robbery and had conversations with Mike Minor (hereinafter Mr. Minor).

20. My son and I had finished working on the roof and decided to go fishing. We loaded our fishing gear in my SUV and left at 1:49 to stop at the Circle K convenient store and as we crossed the intersection to Gulf beach highway a felony stop was performed on my vehicle by the Escambia County Sheriff's Office (hereinafter ECSO). Sergeant Gresham pulled in front of my vehicle from the opposite lane and blocked my vehicle causing me to abruptly slam on brakes. I had a bruise on my chest from the seat belt, then my fingers were twisted and I was pulled out of my vehicle while it was

still in drive, In an effort to put the car in park and with the Deputies pulling my hands I moved the gear selector from drive straight in to reverse,

21. Me and my 14y old son was held at gunpoint, hand cuffed, placed in separate vehicles and taken to the Church of Christ Innerarity located at 13250 Gulf beach rd. We were subjected to what amounted to torture for over an hour. I was hot boxed, a torture technique used to get information from suspects by using the heater in the car and parking the car in the sun. I suffered heat exhaustion and dehydration. My sons shoulder was injured and in the in-car video, he appeared to be blacking out from the pain. He asked for help but was left alone in the car several times. We were in fear for our lives. This all took place in and near the middle of a busy intersection less than an eighth of a mile from our home. Several people witnessed this event. After arriving at the church, a show up was conducted by Sergeant Gresham and the victim Corey Duane Bourgeois stated that I was not the suspect and he seemed upset with Sergeant Gresham. I complained to Deputy Griffin that he twisted my fingers and he stated that “that was before I knew you were not the suspect”. I gave Deputy Griffin my name and he explained that he knew who I was from Defendants Rappe and Guthrie’s interviews.

22. Deputy Weller said that the information obtained from Defendant's Rappe and Guthrie's interviews led to the traffic stop and subsequent events.

23. Sometime after the incident I had asked my neighbor Carolyn Moore (hereinafter Ms. Moore) if she saw or heard anything. She had informed me that she personally had a conversation with a Mr. Mike Minor (hereinafter Mr. Minor) and that Mr. Minor said that he had a conversation with Defendant Guthrie the day of the robbery in which Defendant Guthrie said **"Albert is getting arrested for Bank Robbery" and that Albert was the person who robbed the Warrington Bank (Exhibit 3)**

24. Defendant Guthrie made the statements prior to ECSO having any contact with Plaintiff.

25. After hearing that Defendant Guthrie was spreading false information about me to neighbors, I sent Defendant Guthrie a demand letter explaining that his slander had been reported to me and that his actions had negatively affected me and my family **(Exhibit 1)**.

26. On August 27, 2023 Defendant Guthrie responded to my demand letter **(Exhibit 2)**, in his letter he stated that he in fact had a conversation with Mr. Minor and ECSO. Defendant Guthrie states that he had an interview with ECSO and told them that "He had saw me on my roof at the

time of the bank incident.” Defendant Guthrie further states that he told Mr. Minor the same information as the Sheriff’s Deputy.

27. The ECSO reports I received had no mention of anyone stating that they witnessed me on my roof during the robbery. If Defendant Guthrie told ECSO that he had seen me on the roof during the bank robbery, this case would not be before the Court as ECSO would not have stopped us at all and definitely not executed a high risk felony stop endangering our lives and the lives of several bystanders knowing that a witness had exculpatory evidence that Plaintiff was not the suspect.

28. ECSO was led to believe Plaintiff was the armed bank robber because of the information received from the Defendant Rappe and Guthrie.

29. Defendant’s Rappe and Guthrie’s communications and publication was done with improper purpose and express malice. Defendants were aware that their statements were false when they made them.

30. Plaintiff had been working for people in the community doing odd jobs and those jobs were acquired by word of mouth. I had a reputation of being an honest and trustworthy person. People have treated me differently as a result of Defendant’s false statements. It has negatively impacted our family dynamic.

31. Defendant Rappe and Guthrie's false statements attributed to my son and me suffering from depression and fear of ECSO personnel. My wife, son and I now attend psychotherapy, and my son and I have reoccurring medical needs for the physical injuries we suffered as a result of Defendant's Guthrie and Rappe's false statements. I had previously been diagnosed with high blood pressure and was prescribed a minimal dose of Hydrochlorothiazide to lower my blood pressure. I had been working on lowering my blood pressure so I could stop taking the medication. Due to the stress and trauma from the event my blood pressure has been elevated to the point I have to take Lisinopril with more side effects than the previous medicine, It causes shortness of breath with strenuous activity causing me to avoid certain activities that I like to do.

32. A cause of action is available to one injured as a result of a false report of criminal behavior to law enforcement when the report is made by a party which has knowledge or by the exercise of reasonable diligence should have knowledge that the accusations are false or acts in a gross or flagrant manner in reckless disregard of the rights of the party exposed, or acts with indifference or wantonness or recklessness equivalent to punitive conduct.

33. Defendants Rappe and Guthrie knew or should have known I was not the armed bank robber, had ample time to retract their false statements accusing Plaintiff of bank robbery but failed to do so.

Count I:
Slander per Se
(Against both Defendants)

34. Plaintiff re-alleges, adopts, and incorporates by reference paragraphs 1-33 above and paragraphs 55-71, 79-80 as though fully set forth herein.

35. To state a cause of action for defamation, in Florida, a plaintiff must allege that (1) the defendant published a false statement (2) about the plaintiff (3) to a third party and (4) that the falsity of the statement caused injury to the plaintiff. *Jews for Jesus, Inc. v. Rapp*, 997 So. 2d 1098 (Fla. 2008)), *Seropian v. Forman*, 652 So.2d 490 (Fla. 4th DCA 1995). Defendant Guthrie's statements to ECSO and Mr. Minor accusing Plaintiff of armed bank robbery were false and made with malicious intent to injure Plaintiff's reputation and cause physical harm to Plaintiff. Defendant Guthrie knew that Plaintiff was not the armed bank robber as Defendant Guthrie admits that he saw Plaintiff working on his roof at the time the bank was robbed. Defendant Rappe's statements to ECSO and Defendant Guthrie accusing Plaintiff of armed bank robbery were false and made with malicious intent to injure Plaintiff's

reputation and cause physical harm to Plaintiff. Defendant Rappe knew from conversation with Defendant Guthrie that Plaintiff was not the armed bank robbery suspect.

36. An oral communication is actionable per se if it imputes to another (a) a criminal offense amounting to a felony, or (b) a presently existing venereal or other loathsome and communicable disease, or (c) conduct, characteristics or a condition incompatible with the proper exercise of his lawful business, trade, profession or office, or (d) the other being a woman, acts of un-chastity.” *Campbell v. Jacksonville Kennel Club, Inc.*, 66 So. 2d 495,497 (1953). Under Florida statutes 812.13(2) (a), armed robbery is a first degree felony. As the false statements by Defendant Guthrie and Defendant Rappe accuses Plaintiff of committing armed robbery which is a felony, so Defendant Guthrie and Defendant Rappes statements are defamatory *per se*. and injuries are presumed as a matter of law.

37. Defendant Guthrie’s defamatory statements accusing Plaintiff of armed bank robbery to ECSO and Mr. Minor tend to, and were intended to, attribute to Albert Jackson Jr’s. Conduct, characteristics, or conditions which

are incompatible with the proper exercise of a lawful business, trade, or profession.

38. Defendant Guthrie's defamatory statements accusing Plaintiff of armed bank robbery to ECSO and Mr. Minor tend to, and were intended to, injure Albert Jackson Jr. in his trade or profession.

39. Defendant Guthrie's defamatory statements accusing Plaintiff of armed bank robbery to ECSO and Mr. Minor tend to, and were intended to, subject Albert Jackson Jr. to hatred, distrust, ridicule, contempt, or disgrace and public shame.

40. Defendant Guthrie's defamatory statements accusing Plaintiff of armed bank robbery to ECSO and Mr. Minor were not made in good faith. Instead, Defendant Guthrie made such statements: (a) knowing that they were false and with a reckless disregard for the truth, (b) without reasonable grounds to believe that they were true, and (c) with the intent to damage or injure and defame Albert Jackson Jr.

41. Defendant Rappe's defamatory statements accusing Plaintiff of armed bank robbery to ECSO and Defendant Guthrie tend to, and were

intended to, attribute to Albert Jackson Jr's. Conduct, characteristics, or conditions which are incompatible with the proper exercise of a lawful business, trade, or profession.

42. Defendant Rappe's defamatory statements accusing Plaintiff of armed bank robbery to ECSO and Defendant Guthrie tend to, and were intended to, injure Albert Jackson Jr. in his trade or profession.

43. Defendant Rappe's defamatory statements accusing Plaintiff of armed bank robbery to ECSO and Defendant Guthrie tend to, and were intended to, subject Albert Jackson Jr to hatred, distrust, ridicule, contempt, or disgrace and public shame.

44. Defendant Rappe's defamatory statements accusing Plaintiff of armed bank robbery to ECSO and Defendant Guthrie were not made in good faith. Instead, Defendant Rappe made such statements: (a) knowing that they were false and with a reckless disregard for the truth, (b) without reasonable grounds to believe that they were true, and (c) with the intent to damage or injure and defame Albert Jackson Jr.

45. **WHEREFORE**, Plaintiff demands judgment against Defendant

Guthrie and Defendant Rappe as to Count I, for the following:

- a) Actual damages
- b) Punitive damages
- c) Presumed damages.
- d) Prejudgment interest
- e) Court costs
- f) Such other relief as the Court may deem just and equitable.

Count II.
Negligent Reporting
(Against both Defendants)

46. Plaintiff re-alleges, adopts, and incorporates by reference paragraphs 1-33, above and paragraphs 55-71, 79-80 as though fully set forth herein.
47. Defendant Guthrie and Defendant Rappe knew that Plaintiff was working on his roof at the time of the bank robbery but maliciously and falsely accused Plaintiff of committing armed bank robbery. At no time did either Defendants see Plaintiff at the bank, wearing any clothing worn by the armed bank robber or in commission of any suspicious activity. In fact Defendant Guthrie stated in his response to Plaintiff's demand letter that he saw Plaintiff working on his roof during the time of the bank robbery. Defendant Guthrie and Defendant Rappe had knowledge that Plaintiff was not the suspect that committed the armed bank robbery but maliciously and falsely reported Plaintiff as the suspect that committed the armed bank robbery. A cause of action is available to one injured as a result of a false report of criminal behavior to law enforcement when the report is made by a party which has knowledge or by the exercise of reasonable diligence should have knowledge that the accusations are false or acts in a gross or flagrant

manner in reckless disregard of the rights of the party exposed, or acts with indifference or wantonness or recklessness equivalent to punitive conduct, The tort of negligent reporting is intended to provide redress for injuries suffered due to incorrect reports of criminal activity that do not result in arrest or prosecution (and thereby potentially give rise to a malicious prosecution claim), *Valladares v. Bank of America Corp*, 197 So. 3d at 10-11 (2016). Defendants Guthrie and Rappe should have never made accusations that Plaintiff was the armed bank robber and at any time could have prevented Plaintiff and his son's injuries but failed to do so. Defendants Guthrie and Rappe carelessly reported false information to other persons which both Defendants knew or should have known was incorrect.

Defendant Guthrie by his own statement had knowledge that Plaintiff was working on his roof during the time of the bank robbery.

48. Defendants Guthrie and Rappe in reporting that Plaintiff was the suspect of the armed bank robbery caused Plaintiff and Plaintiffs minor child to be surveilled and forcibly taken into custody at gunpoint causing Plaintiff's and his son's injuries.

49. Plaintiff and his minor child were proven not to be the suspect of the armed bank robbery.
50. Defendants Guthrie and Rappe lacked probable cause for such prosecution as Defendant Guthrie admits to seeing Plaintiff working on his roof at the time of the bank robbery.
51. Any reasonable person having observed Plaintiff engaged in other activity at the time of the bank robbery would not have maliciously reported Plaintiff as the bank robbery suspect. Defendants Guthrie and Rappe lacked probable cause and malice may be inferred from a lack of probable cause, *Gallucci v. Milavic*, 100 So.2d 375 (Fla.1958)
52. As a result of Defendants Guthrie and Rappe's false reports, Plaintiff and his minor child suffered loss of liberty, physical and psychological injuries. Damage to our reputation and character.
53. Defendants Guthrie and Rappe acted with reckless disregard of the rights of the Plaintiff, and that the Defendant Guthrie and Rappe had knowledge of their statements' falsity, which they disregarded.

54. WHEREFORE, Plaintiff demands judgment against Defendant Guthrie and Defendant Rappe on Count II for the following:

- a) Actual damages
- b) Punitive damages
- c) Presumed damages.
- d) Prejudgment interest
- e) Court costs
- f) Such other relief as the Court may deem just and equitable.

55. Members of society have entered a social contract that includes a duty to not cause harm to others. When considering legal duty as an element of negligence, there is a duty to act reasonably. Defendants Guthrie and Rappe in lacking probable cause and having knowledge that Plaintiff was engaged in other activity (working on his roof) during the time of the robbery breeched that duty of care owed to the Plaintiff.

56. A reasonable person in Defendant Guthrie and Rappes situation would not have informed ECSO that Plaintiff committed armed bank robbery as Plaintiff did not match the description of the bank robbery suspect, a reasonable person with knowledge of Plaintiff's whereabouts during the bank robbery would not have falsely accused Plaintiff of armed bank robbery.

57. Defendant Guthrie and Rappe falsely reporting that Plaintiff was the person who robbed the Warrington bank was the direct cause of Plaintiff's son and Plaintiff's, physical, emotional and psychological injuries.
58. Plaintiff suffered irreparable harm to his reputation, emotional, physical and psychological injuries. Plaintiff's minor child and Spouse suffered irreparable harm, emotional, physical and psychological injuries as a result of Defendant Guthrie and Rappe's false and malicious statements.
59. Defendant's Guthrie and Rappe in making false statements about Plaintiff to ECSO violated Florida statutes 837.05.
60. Defendant's Guthrie and Rappe knew or should have known that making a false report that Plaintiff committed armed bank robbery would deprive Plaintiff of his rights and cause Plaintiff harm.
- Defendant's Guthrie and Rappe has shown a wanton disregard for the rights of Plaintiff.

61. Defendant's Guthrie and Rappe had knowledge prior to reporting Plaintiff as the armed bank robbery suspect and still made defamatory statements. At any time, Defendant's Guthrie and Rappe could have informed ECSO that Plaintiff was not the armed bank robbery suspect as they had knowledge of Plaintiff whereabouts at the time of the bank robbery.

FL statutes **837.05 False reports to law enforcement authorities.**—

(1) Except as provided in subsection (2), whoever knowingly gives false information to any law enforcement officer concerning the alleged commission of any crime, commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

(2) Whoever knowingly gives false information to a law enforcement officer concerning the alleged commission of a capital felony, commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

62. Florida statute 837.05 was created to protect innocent law abiding citizens from the false accusations of others, harassment, revenge and injury and death similar to laws against “Swatting” in which a person

falsely and maliciously reports a crime that never happened, only to have a Swat team or heavily armed law enforcement presence show up and subject innocent victims to treatment that is unwarranted.

63. Defendant's Guthrie and Rappe in making false reports about Plaintiff to ECSO violated Florida statutes 817.49

FL Statutes 817.49 False reports of commission of crimes; penalty.

(1) Except as provided in subsection (2), whoever willfully imparts, conveys, or causes to be imparted or conveyed to a law enforcement officer or employee of a public safety agency false information or reports concerning the alleged commission of any crime under the laws of this state, knowing such information or report to be false, when no such crime has actually been committed, commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

(2)(a) As used in this section, the term "public safety agency" means a law enforcement agency, professional or volunteer fire department, emergency medical service, ambulance service, or other public entity that dispatches or

provides first responder services to respond to crimes, to assist victims of crimes, or to apprehend offenders.

(b) If the willful making of a false report of a crime as set forth in this section results in a response by a federal, state, district, municipal, or other public safety agency and the response results in:

1. Great bodily harm, permanent disfigurement, or permanent disability to any person as a proximate result of lawful conduct arising out of a response, the person making such report commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

2. Death to any person as a proximate result of lawful conduct arising out of a response, the person making such report commits a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

- (3) A court shall order any person convicted of violating this section to pay restitution, which shall include full payment for any cost incurred by a responding public safety agency.

64. Florida statute 837.05 was created to protect innocent law abiding citizens from the false accusations of others, harassment, revenge and injury and death similar to laws against “Swatting” in which a person falsely and maliciously reports a crime that never happened, only to have a Swat team or heavily armed law enforcement presence show up and subject innocent victims to treatment that is unwarranted.

65. Defendant Guthrie has admitted that he was witness to my whereabouts during the bank robbery **“I saw you on your roof during the bank incident” (Exhibit 2)** and that he had conversations to ECSO and Mr. Minor. He maliciously reported me to be the armed bank robbery suspect despite his own admittance that I couldn’t have been the armed bank robber and knew his statements were not true.

66. Defendant’s Guthrie and Rappe in making false statements about Plaintiff to ECSO violated Florida statutes 837.055.

Florida Statutes 837.055 **False information to law enforcement during an investigation.**

(1) Whoever knowingly and willfully gives false information to a law enforcement officer who is conducting a missing person investigation or a

felony criminal investigation with the intent to mislead the officer or impede the investigation commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

(2) Whoever knowingly and willfully gives false information to a law enforcement officer who is conducting a missing person investigation involving a child 16 years of age or younger with the intent to mislead the officer or impede the investigation, and the child who is the subject of the investigation suffers great bodily harm, permanent disability, permanent disfigurement, or death, commits a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

67. Defendants Guthrie and Rappe violation of the statutes was the proximate cause of the injury, *de Jesus v. Seaboard Coast Line Railroad Company*, 281 So.2d 198 (Fla.1973).

68. Violating a Florida statute is a prima face case for negligence.

69. Defendant's Guthrie has made defamatory statements to numerous persons that they knew were not true. In his Motion to Dismiss Defendant Guthrie admits to making the statements citing truth and absolute privilege as defenses **(Exhibit 4)** At the motion to dismiss

hearing for my original complaint, Defendant Guthrie argued that he never made a defamatory statement, then he said if he did, it was second or third person hearsay and finally if he did make the defamatory comments and it was not hearsay, Defendant reporting to ECSO that Plaintiff committed armed bank robbery was absolute privilege. Defendant Guthrie stated that “he saw me on my roof at the time of the bank incident” and still he reported to ECSO that I was the armed bank robbery suspect.

70. If the statements are untrue and made with actual or express malice, then the privilege is destroyed (*Drennen v. Washington Electric Corp.* 328 So.2d 52, 55 (Fla. 1st DCA 1976). Defendant Guthrie argues truth and good motive as his defenses and truth and good motive are normally decided by a jury *see Curtis Pub. Co. v. Fraser*, 5th Cir. 1954, 209 F.2d 1; *Diplomat Elec., Inc. v. Westinghouse Elec. Supply Co.*, 5th Cir. 1970, 430 F.2d 38. If there is a genuine issue of material fact, it should be decided by a jury not the Court in a Motion to dismiss hearing. On a Motion to dismiss the Court is required to accept Plaintiffs allegations as true. *See Hernandez v. Tallahassee Med. Ctr., Inc.*, 896 So.2d 839, 841 (Fla. 1st DCA 2005).

71. The Deputies, Mr. Minor and Ms. Moore as a party opponent would be able to give testimony to Defendants statements so their statements are not hearsay. Ms. Moore has given a statement by affidavit and will be testifying at trial as a witness.
72. Defendant Guthrie was told by Defendant Rappe that I was the bank robbery suspect prior to ECSO having any contact with me. He knowingly, falsely reported me as the bank robbery suspect to multiple third parties.
73. Defendants Guthrie and Rappe had ample time and information to know the true facts and to correct their false and incorrect statements, but failed to do so.

Count III
Libel per se
(Against Ms. Rappe)

74. Plaintiff re- alleges, adopts, and incorporates by reference paragraphs 1-33 and 55-71, 79-80 as though fully set forth herein.
75. A publication is libelous per se if, when considered alone without innuendo, it tends to subject a person to hatred, distrust, ridicule, contempt, or disgrace, or tends to injure him in his trade or profession, *Richard v. Gray*, 62 So.2d 597 (Fla.1953), or if it imputes to another conduct, characteristics, or a condition incompatible with the proper exercise of his lawful business, trade, profession, or office. *Barry College v. Hull*, 353 So.2d 575 (Fla. 3d DCA 1977).
76. Ms. Rappe published a photo implying that I was the armed bank robbery suspect to Nathaniel Perry of the ECSO and to Mr. Guthrie. Ms. Rappe attempted to guise her statement as opinion, however, it is a pure statement of fact that is false and defamatory. The statement accuses Plaintiff of armed bank robbery which Ms. Rappe knew was not true and can be proven to be false. Ms.

Rappe's publishing of the photograph to ECSO and Mr. Guthrie were not made in good faith. Instead, Ms. Rappe published the photograph to multiple third parties: (a) knowing that it was false and with a reckless disregard for the truth, (b) without reasonable grounds to believe that it was true, and (c) with the intent to damage or injure and defame Albert Jackson Jr.

77. Defendant Rappe published the photo of Plaintiff to ECSO and Defendant Guthrie implying that Plaintiff was the armed bank robbery suspect that robbed the Warrington bank. The false implication of the published photo was the result of Defendant Rappes negligence, that is, that Defendant Rappe published the false implication without reasonable care as to whether the implication was true or false. *See Miami Herald Publishing Co. v. Ane*, 423 So.2d 376, 389 (Fla. 3d DCA 1983).

78. WHEREFORE, Plaintiff demands judgment against Defendant Rappe as to Count III for the following:

- a) Actual damages
- b) Punitive damages
- c) Presumed damages.
- d) Prejudgment interest
- e) Court costs
- f) Such other relief as the Court may deem just and equitable

79. Violating a Florida statute is a prima face case for negligence.

Defendant Rappe Knew or should have known that making a false report that Plaintiff was the armed bank robber would deprive Plaintiff of his rights and cause Plaintiff harm. Defendant Rappe has shown a wanton disregard for the rights of Plaintiff. Defendant Rappe has an educational background consisting of a S.W. in social work and a B.S. in Sociology with Social work emphasis and has taught courses in Adolescents in Crisis, Social Justice and Families and Family treatment. She has had a private practice counseling children and adults experiencing difficulty with anger management and trauma amongst other things (**Exhibit 7 pages 2-13**). As a psychotherapist, Ms. Pappe's behavior is reckless, irresponsible and contradictory to what would be expected of someone licensed as a Clinical Social Worker that provides assistance to those suffering trauma.

80. Defendant Rappe had knowledge prior to reporting Plaintiff as the armed bank robber and still made the false report. At any time, Defendant Rappe could have informed ECSO that Plaintiff was not the bank robbery suspect as she had knowledge of Plaintiff's whereabouts received from Mr. Guthrie.

Count IV
Civil Conspiracy
(Against both Defendants)

81. Plaintiff re-alleges, adopts, and incorporates by reference paragraphs 1-33, 55-71, 79-80 as though fully set forth herein.

82. Both Defendant's Rappe and Guthrie made defamatory *per se* statements that Plaintiff was the armed bank robber that robbed the Warrington Bank. Defendant Rappe in calling ECSO and informing Defendant Guthrie. Defendant Guthrie made defamatory *per se* statements to ECSO and to Mr. Minor. Both Defendants Guthrie and Rappe through reasonable diligence could have avoided imputing Plaintiff to the damages caused by their malicious acts. Defendant Guthrie made his comments to Mr. Minor before ECSO had even saw or spoken to Plaintiff. Defendant Guthrie is not psychic, there is no way for Defendant Guthrie to

have had knowledge to make the statements that Plaintiff is getting arrested for bank robbery and that Plaintiff robbed The Warrington bank without conspiring with the person that first reported Plaintiff as the armed bank robbery suspect, which is Defendant Rappe, Defendant Guthrie's in-law.

83. Defendant's Guthrie and Rappe knowingly and intentionally conspired to commit the tortuous act of defamation *per se* against Plaintiff. Defendant Guthrie admits the he saw me working on my roof during the time of the bank robbery.

84. Defendant's conduct caused Plaintiff and his son's loss of liberty, Property, physical injury and emotional distress.

85. The emotional distress inflicted by Defendants Guthrie and Rappe is so severe that it requires Plaintiff, his wife and minor child to attend psychotherapy.

86. WHEREFORE, Plaintiff demands judgment against both Defendant's Rappe and Guthrie as to Count IV for the following:

- a) Actual damages
- b) Punitive damages
- c) Presumed damages
- d) Prejudgment interest
- e) Court costs
- f) Such other relief as the Court may deem just and equitable.

Count V
Negligence
(Against both Defendants)

87. Plaintiff re-alleges, adopts, and incorporates by reference paragraphs 1-33, 55-71, 79-80 as though fully set forth herein.
88. Both Defendants Guthrie and Rappe had knowledge that Plaintiff was not the armed robbery suspect that robbed the Warrington Bank.
89. Both Defendants Guthrie and Rappe failed to act with reasonable care and published false and defamatory statements accusing Plaintiff to be the armed bank robbery suspect that robbed the Warrington bank.
90. Both Defendants Guthrie and Rappe knowingly made false statements accusing Plaintiff to be the armed bank robbery suspect to multiple third parties.
91. Both Defendants Guthrie and Rappe's reckless behavior accusing Plaintiff of robbing the Warrington bank is so careless that it is considered an extreme departure from the care a reasonable person would exercise in similar circumstances.

92. Defendants Guthrie and Rappe had a had a legal duty of care requiring the Defendants to conform to a certain standard of conduct for the protection of others, including the Plaintiff, against unreasonable risks and harm. By knowingly spreading false and defamatory statements accusing Plaintiff of armed bank robbery, Defendants Guthrie and Rappe violated his and her duty of care by failing to conform to the required standard. Defendants Guthrie and Rappe had knowledge that ECSO was looking for a suspect that committed a heinous crime in which a person was seriously injured and thousands of dollars was stolen. Defendants Guthrie and Rappe made accusations to several persons accusing Plaintiff of armed bank robbery despite not having any information that Plaintiff was involved in any nefarious activity or any information that Plaintiff matched the description of the armed bank robbery suspect. Defendant Guthrie and Rappe had knowledge that Plaintiff was working on his roof during the time of the bank robbery that could have prevented Plaintiff and his son's loss of liberty, physical, emotional damage to their persons and damage to Plaintiff's property.

93. Defendants Guthrie and Rappe's negligent actions were the approxinant cause of Plaintiff and his son's loss of liberty physical, emotional damage to their persons and damage to Plaintiff's property.

94. Defendants Guthrie and Rappe's publication of false and defamatory per se statements accusing Plaintiff of armed bank robbery were false and known by Defendants to be false when the accusations were made.
95. WHEREFORE, Plaintiff demands judgment against both Defendant's Rappe and Guthrie as to Count V for the following:
- a) Actual damages
 - b) Punitive damages
 - c) Presumed damages
 - d) Prejudgment interest
 - e) Court costs
 - f) Such other relief as the Court may deem just and equitable.

DEMAND FOR JURY TRIAL

Plaintiff hereby demand a trial by jury of all issue so triable.

Respectfully submitted this day 19th day of March, 2025

BY: /S/ Albert Jackson Jr

Respectfully Submitted,
/s/Albert Jackson Jr.
Plaintiff

March 19, 2025

I certify that conferral prior to filing is not required under rule 1.202.” (c)(5) Applicability; Exemptions. The requirements of this rule do not apply when the movant or the non-movant is unrepresented by counsel (pro se) or Summary Judgment.

/s/Albert Jackson Jr
Albert Jackson Jr

CERTIFICATE OF SERVICE

I Albert Jackson Jr **HEREBY CERTIFY** that a true a correct copy of the foregoing has been furnished to all parties via electronic document transfer this 19th day of Mach 2025.

PHILLIP A. PUGH,
HALEY E. HADDEN,
BILLY T. HARRIS III
ROBservice@lawpensacola.com

William Lee Elebash
wle@beggslane.com

SO CERTIFIED on this 19th day March, 2025
/S/ Albert Jackson Jr

Albert Jackson Jr
5811 Monterey Ave
Pensacola, FL 32507
904-233-5236

July 27, 2023

George Guthrie III
13830 Canal Drive
Pensacola, FL 32507

Re: Defamation Per Se

Dear Mr. Guthrie on or about August 11, 2021 I was made aware that allegedly you made defamatory statements regarding my activities and whereabouts on August 10, 2021.

On August 10, 2021 at approximately 2:00pm Escambia County Sheriff's Office performed a felony stop pulling in front of my vehicle causing me to abruptly slam on the brakes and throwing both me and my son forward in the vehicle until the seatbelts caught, injuring both of us. We were approached at gunpoint and a deputy pulled me out of the car by twisting my fingers causing further injury. We were placed in handcuffs and put into separate vehicles and subjected to the most terrifying event in our lives. The handcuffs were placed so tight that I lost feeling in my hands and they left bruises on my wrist. My son's handcuffs were so tight and he was in so much pain that he was passing in and out of consciousness. We were ridiculed and subjected to torture for over an hour to compel us to give information that we didn't have. We suffered injury to our person, property and emotional distress. I suffered damage to my reputation in the community and have ongoing medical cost for the physical and psychiatric injuries. Allegedly those statements were repeated to Mike Minor who then repeated those statements to another neighbor who then told me. Florida statute 837.05 states it a criminal offense to knowingly give false information to a law enforcement officer. Giving false information of any crime is a misdemeanor. Florida statutes 836.04 states that it is a misdemeanor to utter a false statement about someone. This whole ordeal has put a strain on my family and our personal relationships causing irreparable harm. I did work for people in the community and I obtained that work through word of mouth, having a reputation for being honest and trustworthy, this ordeal has caused me to be seen in a negative light. Florida law requires notice before filing a claim against you and this demand shall serve as that notice. We

would hope to settle this issue before filing criminal charges and civil claim. Some recent defamation case in Florida have had verdicts in excess of \$550,000 *see Fernalld v ABB Inc.* \$550,000 verdict and

Lipsig v. Ramlawi, 760 So.2d 170 (Fla. 3DCA 2000) \$10,000,000 in punitive damages and \$175,000 against each defendant in compensatory damages. Given the negative effect this has caused me and my family \$300,000.00 would be satisfactory to resolve this issue and further action against you could result in higher damages sought as well as criminal prosecution. I look forward to hearing from you regarding this matter.

Albert Jackson Jr
904-233-5236
5811 Monterey Ave Pensacola, FL 32507

CERTIFICATE OF SERVICE

I Albert Jackson Jr hereby certify that a true and correct copy of the foregoing has been served upon George Guthrie III by certified mail on the

27th of July 2023

To his last known address

Via Certified mail

George Guthrie III
13830 CANAL DR
PENSACOLA, FL 32507

EXHIBIT No: 1 Page 2 of 2


Signature

August 27, 2023

Albert Jackson Jr.
5811 Monterey Ave.
Pensacola, FL 32507

Re: Demand letter

Dear Albert,

I was surprised to receive your letter because I thought our relationship was good, although limited. I was equally surprised that you might have heard that I used defamatory comments about you on that day two years ago or at any other time. On the contrary, I told the sheriff deputy that interviewed me that I saw you on your roof at the time of the bank incident. I also told him that I didn't believe you were the type of person to do something like that. I only had one interview with the sheriffs where I told them this and had no further input or discussions with them. I didn't see any picture of the perpetrator until after they interviewed me.

I told Mr. Minor the same information that I told the sheriffs, and as I explained, it was that you were on the roof at the time of the incident. I'm sorry you and your son went through that. It was an unfortunate situation that you didn't deserve. I hope any physical or mental injuries you incurred heal quickly. We will be praying for you, your health, and your family.

Sincerely,
George Guthrie.

GENERAL AFFIDAVIT

STATE OF FL

COUNTY OF Escambia

PERSONALLY came and appeared before me, the undersigned Notary, the within named Carolyn Moore, who is a resident of Escambia County, State of FL, and makes this his/her statement and General Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of his/her knowledge:

My name is Carolyn Moore and I live next door to Albert Jackson. A few days after Albert was falsely arrested, another neighbor, Mike Minor, who lives around the corner and who also once lived next door to George Guthrie told me that George Guthrie made accusations that Albert had robbed the bank. He also asked me not to tell Albert; however, I felt that Albert should have this information so I told him immediately.

Albert is not only a very helpful person who lends a hand out to us older folks in the community, but also a very kind and trustworthy individual who deserves to be treated justly.

Sincerely,

Carolyn Moore
5805 Monterey
Pensacola, Florida 32507
Cell: 541-359 -7452

DATED this 27 day of March, 2024

Carolyn Moore

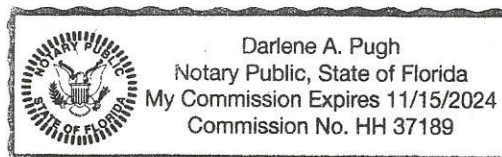
Signature of Affiant

SWORN to subscribed before me, this 27 day of Mar, 2024

Darlene Pugh
NOTARY PUBLIC

My Commission Expires:

11.15.24



IN THE CIRCUIT COURT OF THE FIRST JUDICIAL CIRCUIT
IN AND FOR ESCAMBIA COUNTY, FLORIDA

ALBERT JACKSON JR.,

Plaintiff,

v.

Case No.: 2023 CA 002304

GEORGE GUTHRIE III and
UNKNOWN JOHN DOE OR JANE
DOE DEFENDANTS,

Deiendanis.

/

DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT

COMES NOW, Defendant, GEORGE GUTHRIE III (hereinafter "Mr. Guthrie" or the "Defendant") by and through undersigned counsel, pursuant to Fla. R. Civ. P. 1.140, and moves this Court for an order of dismissal of the Plaintiffs *Complaint*, and in support thereof states as follows:

To be legally sufficient, a complaint must contain (1) a short and plain statement of the grounds of the court's jurisdiction, (2) a short and plain statement of the ultimate facts showing that the pleader is entitled to relief, and (3) a demand for judgment for relief. Fla. R. Civ. P. 1.110(b). Plaintiffs *Complaint* asserts one claim against Defendant: Count 1- Defamation per se. However, the *Complaint* fails on its face under Fla. R. Civ. P. 1.110(6)(2) and further fails to allege a cause of action against Defendant, and Defendant moves for dismissal accordingly.

Under Florida law, defamation is generally defined as the "unprivileged publication of false statements which naturally and proximately result in injury to another." *Bongino v. Daily Beast Company, LLC*, 477 F. Supp. 3d 1310 (S.D. Fla. 2020). Defamation per se "is a tort recognized under Florida law when brought against a non-media defendant." *Rubinson v. Rubinson*, 474 F.

Supp. 3d 1270 (S.D. Fla. 2020). To properly plead a claim for defamation, a plaintiff must sufficiently allege the following five elements: (1) publication; (2) falsity; (3) declarant must act with knowledge or reckless disregard as to the falsity on a matter concerning a public official, or at least negligently on a matter concerning a private person; (4) actual damages; and (5) the statement must be defamatory. *Jews For Jesus, Inc. v Rapp*, 997 So. 2d 1098, 1106 (Fla. 2008) (citing Restatement (Second) of Torts §§ 558B). Similar to a claim of pure defamation, "proof of liability for defamation *per se* requires a showing that the declarant knew or should have known the defamatory statement was not true." *Tilton v. Wrobel*, 198 So. 3d 909, 910 (Fla. 4d DCA 2016). Moreover, if an alleged defamatory statement is in fact true, "the required element of a false statement in a defamation case is not present." *Cape Publications, Inc. v. Reakes*, 840 So. 2d 277, 280 (Fla. 5d DCA 2003).

Pursuant to the Florida Constitution, "if the matter charged as defamatory is true and was published with good motives, the party shall be exonerated." Art. I, § 4, Fla. Const.; 19 Fla. Jur 2d Defamation and Privacy § 58. Moreover, Florida courts are split on whether a "good motive" is required. Many courts have chosen to avoid the "good motive" formula, and there have been numerous decisions handed down by Florida Courts that find no defamation even without any evidence of a good motive or any motive in general, *see Cape Publications*, 840 So. 2d 277. Regarding the truth of a statement, "truth means that the statement complained of should be substantially and fairly accurate." *Florida Pub. Co. v. Lee*, 80 So. 245 (1918). Finally, under the substantial-truth doctrine, a "statement does not have to be perfectly accurate if the 'gist' or the 'sting' of the statement is true." *Cape Publications*, 840 So. 2d at 280.

According to the Plaintiffs *Complaint*, the Defendant allegedly made the following defamatory statement to his neighbor, Mike Minor (hereinafter "Mr. Minor") on the day of the

Robbery: "Albert [the Plaintiff] is being arrested for Bank Robbery" (hereinafter the "Statement"). As alleged, the Plaintiff appears to be relying solely on such Statement as the basis for his defamation per se claim against the Defendant. Notably, the Plaintiff has expressly conceded that, on the exact same day he alleges the Defendant to have made the Statement, the Plaintiff was in fact taken into custody by the ECSO on suspicion of bank robbery. Consequently, the Statement, as alleged in Plaintiffs *Complaint*, fails on its face to adequately amount to or state a claim for defamation per se against Defendant as such statement was substantially and fairly accurate at the time it was published, and there is no suggestion of any malicious or improper motive on Defendant's part in making such Statement. Accordingly, the Plaintiffs *Complaint*, as alleged, does not state a valid cause of action against the Defendant.

WHEREFORE, Defendant moves this Court for an order dismissing Plaintiffs *Complaint* against Defendant, for an award of attorney's fees and costs, and for such other and further relief this court deems just and proper.

Is/Billy T. Harris, III

PHILLIP A. PUGH, FBN: 0505501

HALEY E. HADDEN, FBN: 1028227

BILLY T. HARRIS III, FBN: 1049394

LITVAK BEASLEY, WILSON & BALL, LLP

40 Palafox Place, Suite 300, Pensacola, FL 32502

Tel: (850) 432-9818

ROBservice@lawpensacola.com

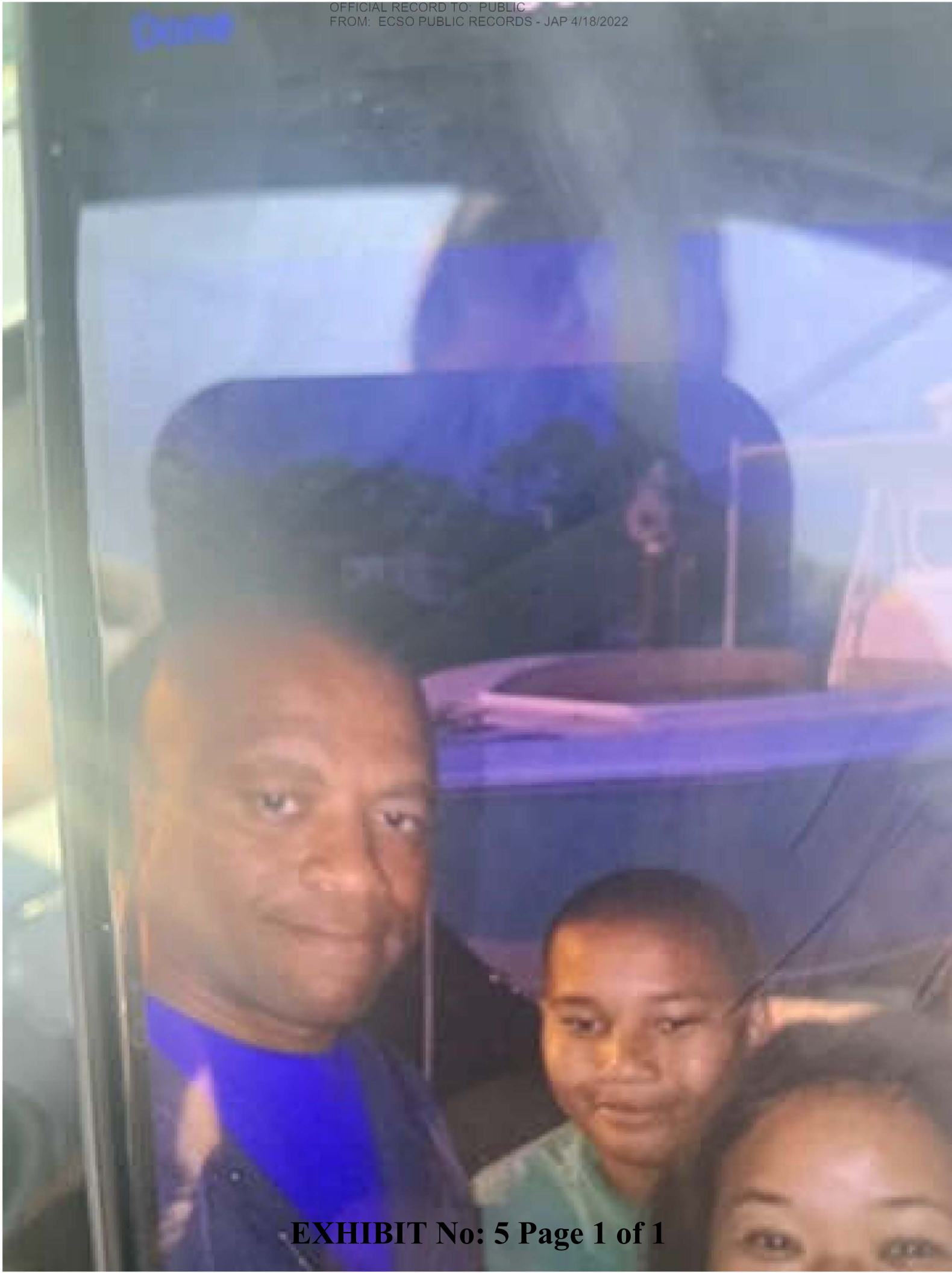
Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true a correct copy of the foregoing has been furnished to the following via electronic mail delivery this 20th day of **December 2023**:

Albert Jackson Jr.,
5811 Monterey Avenue,
Pensacola, Florida 32507
albertjacksonjr@hotmail.com

Billy T. Harris, III
BILLY T. HARRIS, III





ESCAMBIA COUNTY SHERIFF'S OFFICE

CALL HISTORY RECORD

Page 1 of 3

Printed By:

SDSHAW

Printed On:

0511612024 12:15:41

DISPATCH TO LOCATION

Address		Apt / Lot	Domicile Type						
12950 GULF BEACH HWY									
PRECINCT 2 {PERDIDO KEY} - 850-492-2445 X2[YELLOW BLUF									
Cross Street	City	Incorporated?	State	County	Zip Code				
SORRENTO RD	PENSACOLA	No	FL	ESCAMBIA	32507				
Latitude	Longitude	National Grid							
30.31995	-87.41666								
ZONE	District	Grid	Box	RunArea	RescueArea	District	Grid	SubGrid	Wrecker
2	18	A							

LOCATION OF OCCURRENCE

Address		Apt / Lot	Domicile Type						
12950 GULF BEACH HWY									
PRECINCT 2 {PERDIDO KEY} - 850-492-2445 X2[YELLOW BLUF									
Cross Street	City	Incorporated?	State	County	Zip Code				
SORRENTO RD	PENSACOLA	No	FL	ESCAMBIA	32507				
Latitude	Longitude	National Grid							
30.31995	-87.41666								
ZONE	District	Grid	Box	RunArea	RescueArea	District	Grid	SubGrid	Wrecker
2	18	A							

Complaint Type / Call Nature	Priority	Additional Info	Weapon
ASSIST CITIZEN	4		

Complainant	Phone Number	Ext	Contact	911
MADDIE			y	N

Primary Unit	BackUp Units	Dispatcher	Disposition Codes
240	062 165 258 310 312 404 F24	WMMARTIN	(1) 68-0 (4)
ECSO	ECSO ECSO ECSO ECSO ECSO ECSO ECSO	Call Taker	(2) K (5)
		KABROWN	(3) 3 (6)

Incident Number	CALL DATES & TIMES (Note: Individual Unit Times & Close/Code Times are listed after the Call Notes)					
ECS021CAD156181	Received	Shipped	Dispatched	Enroute	Onscene	Closed
Radio Channel	0811012021	0811012021	0811012021	0811012021	0811012021	08/10/2021
	13:08:47	13:08:54	13:10:41	13:10:41	13:23:12	15:14:58

CALL STATISTICS	Create Time	Hold Time	Ro/Out Time	Enroute Time	Onscene Time
	00:00:07	00:01:46	00:00:00	00:12:31	01:51:46
		Dispatch Time		Response Time	Total Call Time
		00:01:53		00:12:31	02:06:11



ESCAMBIA COUNTY SHERIFF'S OFFICE

CALL HISTORY RECORD

SUBJECT RECORD

Date Added 08/10/2021 Time Added 13:09:26 Added By KABROWN Subject Type COMPLAINANT

Last Name MADDIE First Name Middle Name Title Lt. sr, etc.)

Race Sex DoB Age 0 Hair Eyes Height Weight 0

DUID Number State

Description/Comments

Activity Drinking Drugs O weapon Weapon Description
Extent of Injuries O seat Belt Required? Air bag Installed? O child seat Used?
O seat Belt Used? Air bag Deployed? O child seat Required?
Next of Kin

Notified by:
Notified?

Approved for Release By:

D 1 1 o w Public Release of Information on this Subject?

CALL NOTES

Added By	Date	Time	Cal/No	Note
KABROWN	08/10/2021	13:09:01		10 MIN ETA IN BLK FORD TAURUS
KABROWN	08/10/2021	13:09:53		CP WANTS TO BE 10-35, HAS A PIC OF SOMEONE THEY THINK COULD BE BANK ROBBERY SUSP
KABROWN	08/10/2021	13:10:02		10-35'S PX IS 850.261.4168
WM! 'IARTIN	08/10/2021	13:54:56		HAVE A SUBJ DETAINED PER 062
WMMARTIN	08/10/2021	13:56:05		310 1012 JUV TO 13250 GULF BEACH HWY BEG/END 324



ESCAMBIA COUNTY SHERIFF'S OFFICE

CALL HISTORY RECORD

UNIT/ CALL TIMES

DATE	TIME	CALLNO	AGENCY	DESCRIPT	DISPATCHER	MILEAGE
08/10/2021	13:10:41	240	ECSO	ENROUTE	WMMARTIN	0
08/10/2021	13:23:12	240	ECSO	REPORTING	WMMARTIN	0
08/10/2021	13:23:12	240	ECSO	ONSCENE	WMMARTIN	0
08/10/2021	13:27 :03	062	ECSO	ENROUTE	WMMARTIN	0
08/10/2021	13:27:45	404	ECSO	ENROUTE	WMMARTIN	0
08/10/2021	13:27:55	258	ECSO	ENROUTE	WMMARTIN	0
08/10/2021	13:34:42	310	ECSO	ENROUTE	WMNARTIN	0
08/10/2021	13:41:56	F24	ECSO	ENROUTE	WMMARTIN	0
08/10/2021	13:41:57	165	ECSO	ENROUTE	WMMARTIN	0
08/10 /2 021	13:42:03	F24	ECSO	CANCELLED	WM!-IARTIN	0
08/10/2021	13:42:06	165	ECSO	CANCELLED	WMMARTIN	0
08/10/2021	13:42:20	312	ECSO	ENROUTE	WMMARTIN	0
08/10/2021	13:43:48	404	ECSO	CANCELLED	WMMARTIN	0
08/10/2021	13:46:00	310	ECSO	ONSCENE	WMMARTIN	0
08/10/2021	13:47:27	404	ECSO	ENROUTE	WMMARTIN	0
08/10/2021	13:47:32	404	ECSO	ONSCENE	WMMARTIN	0
08/10/2021	14:20:53	310	ECSO	REMOVED	WMMARTIN	0
08/10/2021	14:52:31	258	ECSO	CANCELLED	DMLEE	0
08/10/2021	15:14:58			CLOSED	WM11ARTIN	
08/10/2021	15:15:01			CODED	WMMARTIN	

Complaint History

Date/Time	Complaint	Priority	Complaint Addinfo	Status	Law	Fire	EMS	Weapon
08/10/2021 13:08:54	ASSIST CITIZEN	4		N/A	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

END OF CALL HISTORY RECORD



(850) 261-4168



Current Owner: Paula Rappe

- 9 sources
- [1 user search](#)

CURRENT OWNER DETAILS

Paula Rappe, 71 ★ Best Match

Lives at 13715 Canal Dr, Unit B, Pensacola, FL 32507
Lived in Jupiter FL
Also known as Paula Rappold, Paula S Thompson, Thompson P Rappe, Rappe Paula Thompson, Paula Rappe Thompson
Related to Charles Rappe, Larry Rappe, Amanda Rappe
Includes ✓ Profile ✓ Address(5) ✓ Phone

VIEW DETAILS

PHONE DETAILS ⓘ

AREA CODE LOCATION

Pensacola, FL

PHONE LINE TYPE

Wireless

PHONE LISTING TYPE

N/A

ACTIVITY STATUS

Active

ACTIVITY STATUS CONFIDENCE

High

CARRIER

AT&T Mobility

★ SPECIAL OFFER! | CLAIM NOW →

PAULA T. RAPPE, M.S.W., L.C.S.W.

Department of Social Work
University of West Florida
11000 University Parkway
Pensacola, FL 32514

E-Mail: prappe@uwf.edu
(850) 474-2378 (Work)
(850) 261-4168 (Cell)

EDUCATION/CREDENTIALS

M.S.W., Social Work, 1979, The University of Southern Mississippi

Double emphasis: Community Organization and Mental Health

B.S., Sociology with Social Work Emphasis, 1977, The University of Southern Mississippi

Minor: Philosophy

TEACHING EXPERIENCE

1993 - Present **Assistant Professor**, University of West Florida, Department of Social Work,
College of Justice Studies and Social Work, Pensacola, FL

Responsible for teaching courses in CSWE accredited BSW program
including: Understanding Relationship, Human Behavior in Social
Environment, Work with Groups, Adolescents in Crisis, Disaster: The
Human Factor, Human Diversity and Social Justice, Human Trafficking

1988 - 1993 **Visiting Assistant Professor**, University of West Florida, Division of Social
Work and Aging Studies, Pensacola, Florida

Responsible for teaching courses in CSWE accredited BSW program
including: Introduction to Social Work, Human Behavior in Social
Environment, Families and Family Treatment, Work with Groups
Adolescents in Crisis, Disaster: The Human Factor, Social Justice and
Human Diversity

Advise and act as personal counselor to students in need. Assist students
with special research projects through Directed Independent Studies.
Continue scholarly growth through presentations and publications.
Provide service to others by engaging in University, community and
national professional activities.

PROFESSIONAL EXPERIENCE

2014-2017	Baccalaureate Social Work (BSW) Program Director, University of West Florida (UWF)
2009	Consultant, Pensacola Jr College, Development of behavioral scenarios used in Paramedic simulation training
1995 – 2007	Consultant, Department of Veteran Affairs, Birmingham, Alabama
1997 – 1999	Consultant, Eckerd Family Youth Alternatives, Clearwater, Florida
1986 - 1996	Private Practice, Cordova Counseling Center, Pensacola, Florida Assessments, psychosocials, evaluations, group and individual psychotherapy specializing in children and adults experiencing difficulty with anger management, parenting, trauma, relationship and/or employment difficulties.
1993 - 1996	Co-Facilitator for Domestic Violence Groups, Naval Hospital, Pensacola, Florida
1993 - 1996	Facilitator for Perpetrators of Child Abuse, Naval Hospital, Pensacola, Florida. Contract Services.
1993	Consultant, Eckerd Family Youth Alternatives, Clearwater, Florida.
1991 - 1993	Co-Facilitator for Spouses of Combat Veterans Group, Pensacola Vet Center, Pensacola, Florida.
1986 - 1988	Co-Facilitator for Anger Management Groups, Naval Air Station-Whiting Field, Milton, Florida. Contract Services
1986 - 1988	Family Worker, Eckerd Family Youth
1979 - 1983	Alternatives, Inc., Clearwater, Florida. <ul style="list-style-type: none"> • Responsible for intake and screening. • Provided individual, family and group psychotherapy. • Developed treatment plans and documented progress. • Provided crisis intervention for families. • Taught problem-solving techniques to parents and families. • Developed and implemented public relations program. • Consulted and networked with community resources. • Responsible for aftercare treatment plans and their implementation

- in assisting the child's return to the family and community.
 - Florida, North Carolina, and Rhode Island assisted in development of two new camps (Rhode Island, Florida).
 - Trained new family workers and acted as consultant for aftercare program revision.
- January, 1979 - Graduate Student in Community Organization
- May, 1979 Placement, Mississippi Rural Center, Columbia, Mississippi.
- Assessed problem areas.
 - Assisted community to mobilize resources to produce change.
 - Implemented diagnostic and planning tasks.
- September, 1978 - Graduate Student in Protective Services
- December, 1978 Placement, Hinds County Department of Public Welfare, Jackson, Mississippi.
- Investigated child abuse and neglect.
 - Provided individual and family treatment for high risk abuse/neglect families.
 - Documented intervention services.
- 1977 - 1978 Youth Counselor, Forrest County Youth Court, Hattiesburg, Mississippi.
- Provided individual, family and group therapy to juveniles on probation.
 - Prepared psychosocials and recommendations for court.
 - Supervised practicum students.
- March, 1977 - Director, Opportunity House, a group home for adolescent females.
- August, 1977 Hattiesburg, Mississippi.
- Provided therapy for individuals and families.
 - Performed administrative duties including supervision of practicum students, coordination of services among agencies, development of treatment programs.
 - Documented residents' progress and wrote psychosocials and home evaluations.
 - Participated in community outreach programs.
 - Responsible for referral and placement procedures.
- May, 1976 - Undergraduate Field Placement Student
- September, 1976 Opportunity House, Hattiesburg, Mississippi

PUBLICATIONS

Lewis, M. L., Rappe, P. T., Tierney, L. K., & Albury, J. D. (in press). Stay or Go! Challenges for Hispanic Families Preceding Hurricanes: Lessons Learned. *Journal of Family Strengths*.

Lewis, M. L., Rappe, P. T., & King, D. M. (2018). Development and promotion of student advocacy skills within a human trafficking course. *International Journal of Social Development Issues*, 40(2), 24-35.

Lewis, M. L., Rappe, P.T., Albury, J.D. and Elder, L. D. (2017). Creative teaching and reflection in nontraditional settings: Regional, national and international experiences. *International Journal of Social Development Issues*, 39(1), 29-40.

Olson, M. D., Lewis, M. L., Rappe, P. S., Hartley, S. (2015). Innovations in social work training: A pilot study of interprofessional collaboration using standardized clients *Journal of Practice Teaching and Learning in Higher Education*, in press/online release in process.

Edwards, G.D., Shinfuku, N., Gittelman, M., Ghazali, E.W., Haniman, F., Wibisono, S., Yamamoto, K., Miyaji, N., & Rappe, P. (2006) Postnatal depression in Surabaya, India. *International Journal of Mental Health* 35(1) 62-74

Edwards, G., Edwards, J., Kamae, I., & Rappe, P. (2006). Group format: Survivors of the great Hanshin-Awaji earthquake. *Report of Research Center for Urban Safety and Security*, Kobe University, Japan 10, 197-199.

Edwards, G., Bangert, A., Cooch, G., Shinfuku, N., Chen, T., Yongyi, B., & Rappe, P. (2005). The impact of sibling status on Chinese college students' quality of life. *Social Behavior and Personality: an International Journal*, 33(3), 227-241.

Chen, T., Yongyi, B., Zongfu, M., Rappe, P., Edwards, G., & Shinfuku, N. (2002). Identifying Factors Influencing Mental Health Development of College Students in China. *Social Behavior and Personality: an International Journal*, 30 (6), 547-560.

Sansone, F.A., Bedics, B., & Rappe, P. (2000). BSW Faculty Workload and Scholarship Expectations for Tenure Work. *Journal of Baccalaureate Social Work*, 5(2)16-28.

Bedics, B.C., Rappe, P.T., & Sansone, F.A. (1998) Trauma of Children in a Residential Wilderness

Treatment Program. *Traumatology*, 4 (2) 16-28.

Hall, M. & Rappe, P. (1993). Humor and critical incident stress. De Spelder, L. & Strickland, A.(eds.) *The Path Ahead: Readings in Death and Dying*. Mayfield Publishing Company, 289-294.

Hall, M. & Rappe, P. (1992). Humor and critical incident stress. *International Newsletter for the Association for Death Education and Counseling*.

Rappe, P., Bedics, B., & Rappe, L. (July 1992). Preparing BSW professionals for identifying and salvaging victims of post-traumatic stress disorder. *The BPD Forum* pp 94-100.

FACULTY AWARDS:

- Travel Match Award, College of Education and Professional Studies, UWF, Fall, 2016 for International conference co-authored poster presentation at JUSTEC, Matsuyama, Japan. \$1500.00
- Office of Undergraduate Research proposal for Substance Abuse Exchange hosted by Jikei College Group in Japan and three University of West Florida undergraduate students awarded \$3000.00
- Office of Undergraduate Research proposal for Substance Abuse Exchange hosted by Jikei College Group in Japan and three University of West Florida undergraduate students awarded \$3000.00.
- Major contributor on grant proposal submitted in 2015 to Florida Institute on Child Welfare entitled, Community engaged training: Using simulation activities to strengthen child welfare professional skills, *declined*.
- Travel Match Award, College of Professional Studies 2016, UWF, Spring, 2016 for two national conference presentations, Baccalaureate Program Directors (BPD), Dallas, TX
- *Outstanding Work in Service* award, The University of West Florida College of Education and Professional Studies, 2014-2015.
- Travel Match Award, College of Professional Studies, UWF, Fall 2014 for national conference co-authored paper presentation at 32nd Bachelorette Program Directors (BPD) Conference, Kansas City, Missouri.
- Emerge Faculty Fellow “Escarosa Homeless: Service/Community Based Learning” College of Professional Studies, University of West Florida (UWF)
- Travel Match Award, College of Professional Studies, UWF, Fall, 2013 for national conference co-authored paper presentation at CSWE-APM, Dallas, TX.

- Emerge Faculty Fellow: “COPS Emerge Study Abroad to Support Career Development” College of Professional Studies, UWF, summer, 2013.
- Co-Principal Investigator, Pace Academic Development Award in the amount of \$62,100 through Office of the Provost, UWF, 2013 for “COPS Emerge Study Abroad to Support Career Development”, a high-impact short term study abroad and service learning project in Japan implemented Spring and Summer 2014.

PROFESSIONAL PRESENTATIONS

Rappe, P.T., Lewis, M. & Tierney, L., paper presentation “Stay or go! Challenges for Hispanic populations preceding natural disaster” at 2018 Baccalaureate Program Directors (BPD) Conference in the Human Rights and Social Justice Track, March 14-18, 2018 in Atlanta, GA.

Rappe, P.T., Lewis, M. & Albury, J. paper presentation “Student in action to educate the community on modern day slavery”, at the 2017 Baccalaureate Program Directors (BPD) Conference, Human Rights and Social Justice Track, March 2017, New Orleans. LA

Rappe, P.T., & Edler, L. poster presentation “Making the Community a Classroom: Experiential Learning to Enhance Student Learning and Diversity Appreciation” 29th Japan-U.S. Teacher Education Consortium (JUSTEC) November 4-7, 2016, hosted by Ehime University, Matsuyama, Japan.

Rappe, P.T., Lewis, M., Edler, L. paper presentation entitled, “Student enhancement activities for professional skills development: Diversity, empathy, communication and flexibility” at the 33rd Annual Bachelor Program Directors Conference on March 31, 2016 in Dallas, Texas.

M. Lewis, Rappe, P.T. & J. Albury paper presentation entitled, “Articulating competencies and service delivery challenges: Promoting educational excellence and career preparedness” at the 33rd Annual Bachelor Program Directors Conference on March 31, 2016 in Dallas, Texas

Rappe, P.T., M. Lewis, L. Edler, & J. Albury, “Making the community a classroom: Experiential learning to enhance student learning and diversity appreciation” proposal submitted on May 3, 2016 for the 29th Japan-U.S. Teacher Education Consortium (JUSTEC 2016) on November 4-7, 2016, to be hosted by Ehime University, Japan.

Lewis, M., Rappe, P., Albury, J., & Edler. Paper presentation “Civic Engagement projects and digital storytelling to educate the masses” at the 32nd Annual Baccalaureate Program Directors (BPD) Conference in Kansas City, Missouri, March 8, 2015.

Rappe, P. (May 2014) *High-Impact/Reflective Student Learning: A Faculty Member's Perspective*

Jikei College Group of Japan, Tokyo, Japan.

Olson, M., Lewis, M., Rappe, P. Paper Presentation (Oct-31-Nov 3, 2013) *Exploring the use of Interprofessional Collaboration and Standardized Clients in Competency-Based Education*, Council of Social Work Education – Annual Program Meeting (CSWE-APM) on November 1, 2013 in Dallas, TX.

Cotton, C., Rappe, P., Paper Presentation *Engaging Students in High Impact Educational Practices through Short-Term Study Abroad Programs* 31st Annual Bachelor Program Directors Conference in Louisville, KY, March 19-23, 2014.

Rappe, P. & Nord, R. (Feb 2013) *U.S. and Japan Educational Exchange on Aging Issues*, Alabama Conference of Social Work, Orange Beach, Alabama.

Rappe, P. (June 18, 2013) “March 11, 2011 *Japanese Disasters Mental Health Needs: One Year Later* , Osaka, Japan.

Rappe, P. (June 22, 2013) “March 11, 2011 *Japanese Disasters Mental Health Needs: One Year Later*, Sendai, Japan.

Rappe, P. & Rappe, L. (June 24, 2011) *Mental Health in the Wake of Disaster: Taking Care of Self and Others*, Tokyo School of Welfare, Tokyo, Japan.

Rappe, L. & Rappe, P. (June 23, 2011) *Learning from Relief Effort Experiences during Large Scale Disasters in the U.S.: Lessons Learned*, Presented to Non-Profit Professionals involved in Japanese Disaster(s) Relief Efforts. Introduced by Yoshio Okawara, Former Ambassador of Japan to America (1980-1985) and President of American-Japan Society, Arcadia, Tokyo, Japan

“Rappe, P. & Rappe, L. (June 23, 2011) *Mental Health in the Wake of Disaster: Taking Care of Self and Others*, Saitama School of Welfare, Saitama, Japan.

Olson, M., & Rappe, P. (2011 February). *Simulations and Competency Assessment: A Community Partnership* Paper presented at the 28th Annual Conference of the Baccalaureate Program Directors (BPD), Cincinnati, Ohio.

Rappe, P. (2005 April). *Professional renewal: An overview of stress, critical incident stress, compassion fatigue and burnout*. Paper presented at the Field Instruction Supervisor Training, University of West Florida, Pensacola, FL.

Rappe, P. (1999 August). *Behavioral stress or emotional duress: You make the call*. Paper presented at the 26th Annual Mississippi Juvenile Justice Conference, Biloxi, MS.

Rappe, P., & Albury, J. (November 1999). *Preparing social work students for the future: Including*

trauma in the curriculum. Paper presented at the 28th Annual Alabama-Mississippi Social Work Education Conference in Jackson, MS. (jurored).

Students Presentations: "The Conflict(s) of Professional Ethics and Religious Beliefs," Paper presented by Kristen King and Jennifer McDermott, at The Alabama / Mississippi Social Work Education Conference, Anniston, Alabama, November 4 & 5, 1998.

A National Survey of Promotion and Tenure Criteria of Accredited Social Work Programs." Paper coauthored with F. Sansone and B. Bedics. Presented with F. Sansone and B. Bedics at the 16th Annual Conference of the Association of Baccalaureate Social Work Program Directors, Albuquerque, New Mexico, October, 1998.

"Critical Incident Stress Debriefing Training for United States Department of Veteran Affairs. St. Petersburg, Florida 1995.

"The Religiously Fundamentalist Student: A Challenge to Social Work Educators," presented with B. Bedics at the 12th Annual Association of Baccalaureate Social Work Program Directors, San Francisco, California, 1994.

"Behavioral Symptomology of Children in a Wilderness Treatment Program" presented with B. Bedics at the 19th National Institute on Social Work and Human Services in Rural areas in Castleton, Vermont, 1994.

"Mental Health Response to Hurricane Andrew", presented with L. Rappe at the Second World Congress of Stress, Trauma, and Coping in the Emergency Professions, Baltimore, Maryland, April 1993.

"Building Cultural Bridges: A Social Work Student Group Experience," presented with B. Bedics at the Tenth Annual Conference of Baccalaureate Program Directors, San Antonio, Texas, September 1992.

"Preparing BSW Professionals for Identifying and Salvaging Victims of Post-Traumatic Stress Disorder," with B. Bedics and L. Rappe, presented at the 9th Annual Conference of Baccalaureate Program Directors of Social Work Programs, Orlando, Florida, September, 1991.

"Critical Incident Stress Debriefing Training," presented upon request at the following locations: Pensacola, Orlando, Melbourne, Florida, and Hattiesburg, Mississippi.

"Family Communication Skills," presented at the Third Annual Hearts and Sirens Conference, Pensacola, Florida, February, 1990.

"Early Warning Signs of Post-Traumatic Stress Disorder," presented at the Second Annual Hearts

and Sirens Conference, Pensacola Beach, Florida, 1989.

"Crisis Intervention," presented to Eastern Airlines Pilots Association Regional Meeting, Pensacola, Florida, 1989.

"Leading Groups for Blended Families," presented at the Eckerd Family Youth Alternatives National Conference, Lake Junaluska, North Carolina, 1988.

"Survival Tips for Women Facing Danger," presented to Navy wives at Naval Air Station-Whiting Field, Milton, Florida, 1986.

COMMUNITY SERVICE PRESENTATIONS

Presented workshop *Enhancing group work skills*, (October 2007) Pace Center for Girls, Pensacola, FL

Presented workshop *Creating calm after chaos*, (September 2005) Perdido Key Community Center, Pensacola, FL

"ADHD Children: How Teachers Can Help," Episcopal Day School, Pensacola, Florida, March, 1991.

"An Overview of Acute Stress Responses: Reintegrating the Saudi Veteran with the Family," presented at NAS Hospital, Pensacola, Florida, (two presentations, one to hospital staff and one to spouse support group), March, 1991.

"Anger Management", presented to Peer Counselors, Woodham High School, Pensacola, Florida, March, 1990.

"Anger Management," presented at The University of West Florida Symposium on Intimate Violence, Pensacola, Florida, 1989.

CERTIFICATIONS/LICENSURES

Licensed Clinical Social Worker, State of Florida, Department of Professional Regulation, #1830.
Academy of Certified Social Workers, National Association of Social Workers.

Diplomate in Clinical Social Work, NASW.

International Critical Incident Stress Foundation: Critical Incident Stress Management, Basic Certification and Critical Incident Stress Management Advanced Certification.

Psychological First Aid American Red Cross

Certified Facilitator for Step Family Program.

Certified Facilitator for Systematic Training for Effective Parenting (S.T.E.P).

Certified Facilitator for Strengthening Your Step family.

PROFESSIONAL MEMBERSHIPS/AFFILIATIONS

Florida Medical Reserve Corp

VA Stand Down Planning Committee

Listed in National Register of Clinical Social Workers, 1988.
 Listed in Who's Who Among Human Service Professionals, 1986.
 Green Cross Academy of Traumatology
 Society for Traumatic Stress Studies. Member of Theory and Development Subcommittee, 1990.
 International Critical Incident Stress Foundation.
 Critical Incident Stress Debriefing Team, State of Florida.

UNIVERSITY/DEPARTMENT SERVICE

Member Common Ground Planning Committee
 Member Curriculum Committee, Department of Social Work 2013 to present
 Member Admission/Retention Committee, Department of Social Work 2013 to present
 Member General Education Committee, Department of Social Work 2013 to present
 Member Bookstore Advisory Board 2010-Present
 Faculty advisor to Student Social Work Organization, 2002-Present
 Faculty liaison with Japan Center/Jikei College Group of Japan. Coordinated call for papers, paper selection and assisted UWF students in revisions for papers they presented at Annual Japan/U.S. Social Welfare Symposium at the University of West Florida, Pensacola, Florida 2006 –Present
 Chair of International Social Work Committee, Department of Social Work
 Board of Directors: Educational Research Center for Child Development (ERCCD) 2010 to present
 Member UWF Sick Leave Pool 2007 – 2014
 Member of CCR Committee 2010 to present
 Member of Ad Hoc Disability Resource and Advisory Committee 2011
 Chair of the International Social Work Committee, Dept. of Social Work 2009 – present
 Chair of planning committee for first MSW graduates reception
 Member of the Division of Social Work Search Committee for recruiting chair position 2005
 Member of the Academic Standards and Review Committee, College of Professional Studies 2005
 Member of the UPC Collegial Culture and Human Resources Committee 2005
 Coordinated call for papers, paper selection and assisted students in revisions for papers they presented at Annual Japan/U.S. Social Welfare Symposium at the University of West Florida, Pensacola, Florida 2003 - 2006
 Presented “Creating calm after chaos” to faculty and staff of the College of Professional Studies, University of West Florida, Pensacola, Florida, October, 2004.
 Assisted in call for papers, paper selection and assisted 9 students in revisions for papers they presented at 6th Annual Japan/U.S. Social Welfare Symposium in Tokyo, Japan, 2002
 Member of planning team and faculty facilitator for student paper presentation for 5th Annual Japan- U.S. Social Welfare Symposium, 2001
 Member of planning team and moderator for student paper presentations on Mental Illness for 4th Annual Japan-U.S. Social Welfare Symposium, 2000
 Moderator of student paper presentation for 3rd Annual Japan-U.S. Social Welfare Symposium, 1999

Member of planning team for 2nd Annual Japan-U.S. Social Welfare Symposium, 1998.
 CASS Council Chairperson, 1996-1997.
 CASS Council member, 1994-1997.
 Member of planning team for 1st Annual Japan-U.S. Social Welfare Symposium, 1996.
 Search Committee member for Chairperson for Nursing Department.
 Chair, Social Work Ethics Committee, 1994-2007
 Educational Research Development Center for Children Board of Directors: 1992 to 2007
 Educational Research Development Center for Children Appeals Committee 1996 - 2007
 Student Retention Committee member, 1992.
 National Association of Social Workers liaison to University of West Florida, 1993 - 1996.
 Faculty Advisor for Student Social Work Organization, 1991 - 1994.
 Assistant Faculty Advisor to Student Social Work Organization. (As part of this activity, assisted with coordination of Symposium on Intimate Violence, 1989.)
 Coordinated International Friendship Day developed by students in Social Work Groups class, 1990 -1995.
 Faculty escort to class of social policy students to participate in a Legislative Lab experience, 1990, 1991, and 1992.

COMMUNITY/ PROFESSIONAL SERVICE

Member Race and Reconciliation Community Group, Pensacola, Florida 2015 to present
 Member VA Homeless StandDown Planning Committee 2010-Present
 Member Escarosa Coalition on the Homeless Day of Service Planning Committee 2013
 Responder to March 11. 2011 Japan Disasters, June 13-24, 2011
 Reviewer for Traumatology Journal 2011
 Member of Florida Medical Reserve Corps 2010 to present
 Assisted in organization and participated in Stand Down for Homeless, 2007 - Present
 Consulted with Dr. Glen Edwards, World Health Organization 2008, in compiling Psycho-social intervention guidelines for Chinese Earthquake of May 12, 2008.
 Co-Chair Student Volunteer committee for the 25th Annual Baccalaureate Social Work Education Conference, Destin, Florida, 2008
 Assisted in disaster response and recovery, Hurricane Katrina, Mississippi Gulf Coast
 Assisted in implementation of disaster response for Perdido Key and Innerarity communities following the destruction of Hurricane Ivan. 2004
 Member Be Ready Alliance Coordinating for Emergencies (BRACE)

 Member of the Emotional and Spiritual Subcommittee of the Ivan Long Term Recovery Committee, affiliated with Rebuild Northwest Florida 2004 to 2006.
 Charter member of Housing Opportunities Made Equal (H.O.M.E.), 2002.
 Assisted with pilot program, Escambia County Emergency Medical Services, 1998.
 District 1 Critical Incident Stress Management team member, 1989-present.
 Disaster relief worker during aftermath of Hurricane Opal, Disaster Medical Assistance Team (DMAT) Pensacola, FL, 1995.
 Disaster relief worker, Critical Incident Stress Management, USCG - Destin, FL, 1995.

National Association of Social Workers State Conli Board, 1995-1996.
Clinical Coordinator for Homeless Shelter for Veterans, Pensacola, Florida, 1994 to.
Disaster relief worker, Critical Incident Stress Management (CISM) of Florida, during aftermath
of Hurricane Andrew, Miami, Florida.
Sponsored community workshop "Vietnam: The War Within" by Australian author, Glen
Edwards.
Co-Coordinated Critical Incident Stress Debriefers 4th Annual "Hearts and Sirens" Conference,
Navarre Beach, Florida, 1991.

(06/10/2016)