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**THE CIRCUIT COURT FOR THE 18<sup>TH</sup> JUDICIAL CIRCUIT IN  
AND FOR SEMINOLE COUNTY, FLORIDA**

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**AMANDA FAITHE SELBY and  
JENNIFER LYNN BLISH,**

**Plaintiffs,**

**v.**

**IVAN JOSE CASTRO, and  
PRIVATE HEALTH MD, PA,**

**Defendants.**

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**Case No.**

**COMPLAINT FOR MONETARY RELIEF**

AMANDA FAITHE SELBY and JENNIFER LYNN BLISH sue IVAN JOSE CASTRO, and PRIVATE HEALTH MD, PA, and allege the following:

**JURISDICTION AND VENUE**

1. This Court has subject matter jurisdiction because the amount in controversy is more than \$1,000,000, exclusive of interest, attorneys' fees, costs, etc.

2. This Court has personal jurisdiction over each of the parties because each person or entity is domiciled in the State of Florida.

3. Venue for this matter is proper in Seminole County, Florida because the acts and omissions giving rise to this lawsuit occurred in Seminole County, Florida.

**PARTIES TO THIS LAWSUIT**

4. PRIVATE HEALTH MD, PA (“PHMD”) is a Florida professional association.

5. IVAN JOSE CASTRO (“CASTRO”) is an individual domiciled in the State of Florida who is over the age of 18. CASTRO is the sole officer, director, and shareholder of PHMD and it is the entity through which he operates his medical practice, among other things.

6. AMANDA FAITHE SELBY (“SELBY”) is an individual domiciled in the State of Florida who is over the age of 18.

7. JENNIFER LYNN BLISH (“BLISH”) is an individual domiciled in the State of Florida who is over the age of 18.

**GENERAL ALLEGATIONS APPLICABLE TO ALL COUNTS**

A. The Relationship Between SELBY, BLISH and CASTRO.

8. CASTRO is a licensed medical doctor with a specialization of Internal Medicine. Internal medicine doctors are trained to care for adults of all ages for many different medical conditions.

9. An internal medicine doctor typically monitors chronic physical conditions, identifies acute diseases, provides family planning, provides counseling about wellness and disease prevention.

10. Between November 2003 and December 2007, SELBY, BLISH and CASTRO worked together at Winter Park Internal Medicine, PA, a medical practice in Winter Park, Florida; this job was SELBY and BLISH's first jobs as adults – they had both recently graduated from high school<sup>1</sup>.

11. CASTRO opened PHMD in January 2008, and resigned his position Winter Park Internal Medicine, PA to pursue his own private medical practice.

12. CASTRO asked both SELBY and BLISH to join him at his new medical practice; BLISH accepted the position and resigned her position Winter Park Internal Medicine, PA to work for PHMD.

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<sup>1</sup> BLISH had recently received her GED.

13. SELBY did not initially join BLISH and CASTRO because she was expecting to start a family and did not want to change jobs during this critical juncture in her personal life.

14. SELBY eventually resigned her position at Winter Park Internal Medicine, PA to take a position with PHMD (also at CASTRO's request).

15. SELBY decided to join PHMD because she had complications with her pregnancy while at work and ultimately lost her child, a horrific experience that worsened her depression and anxiety - the memory of losing her child while at this facility was too painful for her to continue to work at that facility.

16. CASTRO, in addition to working with SELBY and BLISH, was each woman's personal and primary care physician – i.e., an official doctor-patient relationship was established.

17. CASTRO diagnosed most of SELBY and BLISH's medical conditions, he referred them to other medical specialists as and when necessary, but most of the prescription medication that they took was prescribed to them by CASTRO.

18. Regarding prescription medication, it is important to note that CASTRO must examine and diagnose SELBY and BLISH before he could legally and morally decide what medications to prescribe them.

19. CASTRO was fully aware of each woman's personal afflictions, their psychological disorders, and other details of their personal lives and medical history.

20. It is fair to say, that CASTRO had a very intimate (but nonsexual) relationship with both SELBY and BLISH because he was their doctor, co-worker, boss, and ultimately, a friend given their long history of working together, interacting with one another daily, and SELBY and BLISH's dependence on Castro on various levels.

21. CASTRO was cognizant of each woman's disabilities and other conditions based on his personal observations over a 10 plus - year period, witnessing their personal losses, discussing those issues with them, treating them for depression, anxiety, and other medical concerns, coupled with his continuous and long-term interactions with each of them, among other things.

22. CASTRO has a history of abusing female staff – verbally, emotionally, and psychologically, and there were instances of him engaging in carnal relationships with female staff.

23. CASTRO used his intimate knowledge of SELBY and BLISH's respective maladies to control them – he knew that each woman was dependent on her job to provide for herself and her family; he likewise knew that each woman

was wholly dependent on him to treat their respective medical and psychological woes.

24. Upon information belief, CASTRO kept SELBY and BLISH over medicated with prescription medication in his effort to control them and maintain their dependence on him.

25. Despite enduring considerable and sustained abuse, both women were anxious and too scared to consider leaving PHMD and routinely submitted to CASTRO's will, often forgiving him for his transgressions against them.

26. The relationship between CASTRO and the two Plaintiffs evolved into one that would be described medically as "intimate partner violence" ("IPV") - a psychological condition that develops when a person experiences abuse, usually at the hands of an intimate relationship (not a sexual or romantic) with a male.

27. The Center for Disease Control notes that an IPV relationship can take many forms. It includes — but is not limited to — current or former partners, spouses, people who are dating, sexual partners, and people who do not have a sexual relationship. Relationships may be heterosexual or same sex.

28. According to the National Coalition Against Domestic Violence (NCADV), 1 in 4 women and 1 in 9 men in the United States experience violence from an intimate partner. Around 15% of all violent crimes involve an intimate partner.

29. The Center for Disease Control and NCADV currently list the following as types of IPV:

- a. *Sexual abuse*: This includes rape, unwanted sexual contact, and verbal sexual harassment.
- b. *Stalking*: This involves a person using threatening tactics to cause a person to feel fear and concern for their safety.
- c. *Physical abuse*: This includes slapping, pushing, burning, and the use of a knife, gun, or other weapon to cause bodily harm.
- d. *Psychological aggression*: Examples include name-calling, humiliation, or coercive control, which means behaving in a way that aims to control a person.

30. A person experiencing IPV may:

- a. Feel isolated, anxious, depressed, or helpless.
- b. Be embarrassed for fear of judgment or stigmatization.
- c. Love the person who is abusing them and believe that they will change.
- d. Become emotionally withdrawn.
- e. Deny that anything is wrong or excuse the other person.
- f. Be unaware of the type of help that is available.
- g. Have perceived moral or religious reasons for staying in the relationship.

31. Current medical science suggests that people experiencing this abuse will have one or more of the following conditions that could become permanent if not diagnosed and treated:

- a. Reduced and diminishing self-esteem.

- b. Long-term symptoms of PTSD
- c. Long-term disability or health problems related to the physical abuse.

32. It was not uncommon for CASTRO to harass, humiliate, and degrade these women as part of his pattern, practice, and scheme to control them.

33. For example, PHMD had a holiday party in which all the staff and several other guests attended. CASTRO gave SELBY an inflatable sex doll in front of some fifty or so guests to ridicule, degrade, and humiliate her, which was successful as she felt helpless to do anything other than cry and walk away embarrassed.

34. CASTRO continued to jab SELBY for months about this incident, which impacted her anxiety, depression, and feelings of inadequacy – this event broke her as did much of CASTRO’s verbal abuse and taunting.

35. SELBY and BLISH also suffered, because the relationship issues discussed above, from the medical condition known as “codependency” regarding their respective relationships with CASTRO.

36. In sociology, codependency is a theory that attempts to explain imbalanced relationships where one person enables another person's self-destructive behavior such as addiction, poor mental health, immaturity, irresponsibility, or under-achievement.

37. Definitions of codependency vary, but typically include high self-sacrifice, a focus on others' needs, suppression of one's own emotions, and attempts to control or fix other people's problems.

38. People who self-identify as codependent exhibit low self-esteem, but it is unclear whether this is a cause, or an effect of characteristics associated with codependency.

39. Codependency is not limited to married, partnered, or romantic relationships as co-workers, friends, and family members can be codependent, especially in circumstances like that presented in the relationship between CASTRO and SELBY, and CASTRO and BLISH.

B. Plaintiffs' Job Responsibilities for PHMD Relevant to the Issues Giving Rise to this Lawsuit.

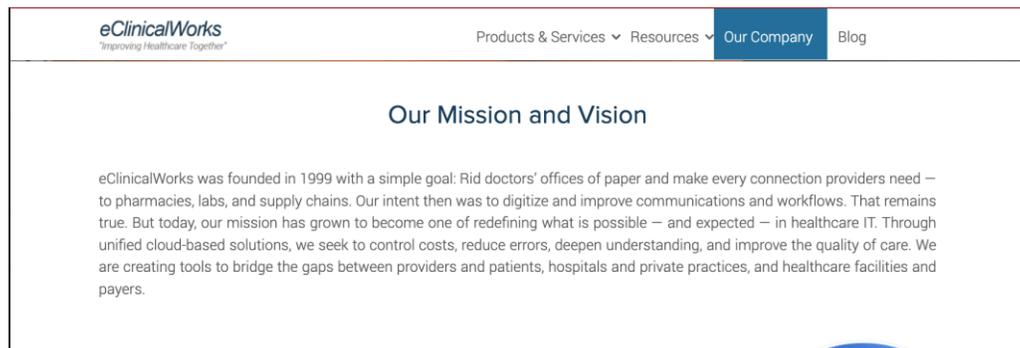
40. SELBY and BLISH were hired to be CASTRO's medical and administrative assistants.

41. SELBY and BLISH's job responsibilities ranged from assisting with patient care (including assisting the doctor with examining patients), drawing blood and processing the related paperwork, processing paperwork for medical billing and the administration of patient medical records, to dispensing of prescription medication, among other tasks typical of a medical assistant.

42. SELBY was trained as a phlebotomist and both she and BLISH often served as CASTRO's quasi-nurse to his patients.

43. One of SELBY and BLISH's job responsibilities was to assist CASTRO with dispensing medication (over the counter and prescription) to PHMD patients; other members of PHMD's staff likewise assisted with this very routine administrative task to assist the doctor in providing care to patients.

44. Regarding prescription medication, SELBY, BLISH, and other members of PHMD staff would input the information into eClinicalWorks™, which was the practice management system that PHMD used at the time.



45. CASTRO would instruct them what medicine to input into the system, approve the prescription to be dispensed, and the staff person would electronically submit the prescription to the pharmacy of choice of the patient.

46. The foregoing notwithstanding, it was customary for CASTRO to be completely disengaged in prescription renewals and to rely entirely on his staff (SELBY and BLISH in particular) to dispense medications.

47. For example, members of PHMD's staff were told that they were expected to refill all prescriptions for any patient whose concierge membership dues were current<sup>2</sup>; staff were expected to refill medication without disturbing CASTRO as he had no interest in being involved with such ministerial activities.

48. CASTRO's policy was – refill any medication the patient needs without question so long as the patient's membership dues were current.

49. All pertinent information about medications prescribed and dispensed to PHMD patients was maintained in eClinicalWorks™.

50. A review of both medical and business records that PHMD maintains in eClinicalWorks™ would show that just about every member of PHMD's staff (i.e., people other than SELBY and BLISH) was prescribed medication by CASTRO that submitted to a local pharmacy through eClinicalWorks™; including medication that CASTRO prescribed for himself.

51. Upon information and belief, however, CASTRO would order a prescription for one of his staff for his own personal use and would authorize the person to use his PHMD Corporate Bank of American Visa Card to pay for the

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<sup>2</sup> PHMD offers concierge services to its patients. Concierge medicine is a private-pay healthcare system. It involves paying a direct fee to concierge doctors for their services rather than going through traditional health insurance. By paying the primary physician directly through a retainer, they offer additional benefits that a patient wouldn't get elsewhere, such as quicker appointments, more personalized treatment, and more time with the doctor.

medication. CASTRO would do this because it is illegal for him to prescribe medication to himself.

C. Plaintiffs' Departure from PHMD.

52. During the Winter of 2017, CASTRO's abusive behavior reached an all-time high due to the failure, among other things, of his intimate relationship with Sheri Caldwell and his personal obsession with stalking and harassing her.

53. The stress and anxiety became unbearable that SELBY felt compelled to overcome her dependence on CASTRO to resign from her position at the end of March 2017, even though she did not have another job – she was overwhelmed by the verbal abuse, humiliation, and taunting from CASTRO.

54. Upon information and belief, CASTRO became enraged by SELBY's decision to resign and leave him, as he, too, had become dependent on the relationship.

55. Within a day of SELBY's resignation, BLISH was likewise forced to make the decision to resign (even though she, too, did not have a job lined up) because CASTRO's abuse towards her increased once SELBY was gone.

56. For example, CASTRO accused BLISH of stealing \$37,000, threatened criminal prosecution against her, and harassed her about the situation until he realized he was mistaken.

57. Upon information and belief, SELBY and BLISH's departures riled CASTRO to the point that he embarked on a crusade to exact his revenge upon them – abusers generally take exception to their victim's efforts to seek independence.

D. The Defendants' Mission to Terrorize and Emotionally, Psychologically, and Physically Destroy SELBY and BLISH.

58. At some point after SELBY and BLISH'S departure, CASTRO filed a false police report against SELBY and BLISH with the Seminole County Sherriff's Department and the Winter Park Drug Enforcement Agency; CASTRO was contacted by the Winter Park DEA about an issue with another of his employees and decided to use this interaction as the means for extracting his revenge upon the former victims of his abuse as he was obsessed with wanting to get back at them for leaving him.

59. CASTRO wrongfully and maliciously accused SELBY and BLISH of forging his name to obtain numerous prescription antidepressant and anxiety medications, illegally.

60. CASTRO told law enforcement that neither SELBY nor BLISH had his authority to issue prescriptions in his name and he stated that he had no knowledge that they had been doing this for years, even though there are plenty of medical records at PHMD that would clearly show otherwise.

61. CASTRO made these statements and representations knowing that they were not true and that there was information in his eClinicalWorks™ interoffice messaging records that would clear demonstrate that his accusations were not true, and he knew them to not be true since he was the person that was treating the two women.

62. CASTRO embarked on this quest for one simple reason – revenge; he wanted to punish, humiliate, degrade, harass, and destroy SELBY and BLISH simply because they did not want to continue to be the victims of his abuse or enable him to abuse other women in his life.

63. SELBY and BLISH were both arrested, incarcerated, and charged with multiple state and federal felonies.

64. This arrest and incarceration, coupled with the struggles they endured to prove their innocence, exacerbated their already fragile mental and psychological conditions by making them paranoid, at times suicidal, and falling deeper into depression.

65. This malicious act by CASTRO also destroyed each of them financially, as they were not able to maintain gainful employment (in addition to suffering medically) and both were eventually homeless and had to find a new place to live because they were evicted.

66. In the case of BLISH, she was a single mother at the time, which means both her and her daughter (a minor) were displaced and facing extreme hardship.

67. SELBY and BLISH endured great mental and financial hardship to defend themselves, but after a year plus of fighting the charges, all felony charges were ultimately dismissed in favor of SELBY and BLISH because there was no evidence to support the allegations.

68. In the end, it was clear that this entire process was the result of an abuser's quest to have vengeance on his victims and nothing more.

#### RETENTION OF COUNSEL AND CONDITIONS PRECEDENT

69. Plaintiffs have retained Kevin K. Ross-Andino and the law firm of éclat law PA to represent them in this lawsuit. These women are obligated to compensate trial counsel for services rendered in connection with such retention.

70. All conditions precedent to filing this lawsuit have been completed, have expired, or have been effectively waived.

#### COUNT I INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AGAINST CASTRO BY SELBY.

71. Plaintiffs adopt and reallege the allegations in paragraphs 1 through 70 above as if fully set forth herein.

72. This is an action by SELBY against CASTRO and PHMD for intentional infliction of emotional distress related to his outrageous, intentional, malicious, and repugnant undertakings to file a false criminal report with the Seminole County Sherriff's Department against SELBY and his continuous behavior to abuse the legal system to exact his revenge on her because she decided that she could no longer bear his abuse.

73. CASTRO, as SELBY's primary care physician, had a fiduciary and intimate relationship with SELBY and had firsthand and personal knowledge about her depression, anxiety, and other psychological disorders, which put him in a unique position to take revenge on his former victim of abuse.

74. CASTRO used his trusted knowledge of SELBY's medical condition as a weapon to fabricate charges against her and took steps to provide false and misleading information to the Seminole County Sherriff's Department about the prescription medication that he prescribed for her.

75. CASTRO hoodwinked the Seminole County Sherriff's Department and caused the law enforcement agency to believe that SELBY illegally prescribed medication for herself (i.e., without CASTRO's knowledge and approval) and submitted prescriptions and prescription refills to her pharmacy so she can take her medication.

76. CASTRO's intentional, malicious, and repugnant behavior resulted in SELBY being wrongfully arrested, incarcerated, and charged with multiple felonies.

77. CASTRO knew, at the time he embarked on this process of seeking revenge against SELBY, that the statements he was making were false and that there was no evidence to support the allegations but made them anyway because it was his aim and objective to cause SELBY to have an emotional breakdown and possibly consider suicide because of the nature of the charges coupled with her depression, anxiety, and other psychological disorders.

78. In addition to being arrested, incarcerated, and charged with multiple felonies, SELBY immediately became unemployable (she could not obtain a job to support herself because of these felony charges), her OB/GYN and other doctors refused to treat her, and her local pharmacy refused to fill her prescriptions.

79. SELBY has suffered, and continues to suffer, tremendous harm as a direct and proximate result of CASTRO's actions, including but not limited to (i) PTSD; (ii) increased depression; (iii) increased anxiety; (iv) an inability to obtain gainful employment in the medical field or other profession as a result of the negative history created by CASTRO's behavior; (v) mental anguish from not being able to seek medical treatment from local physicians as a result of this series of

events; and (vi) mental anguish related to her inability to have prescription medications filled at certain pharmacies.

WHEREFORE, AMNADA F. SELBY respectfully requests that this Court fully enter judgment in her favor and against IVAN JOSE CASTRO and PHMD permissible under Florida law, including an award of punitive damages, together with such further and additional relief the Court deems just under the circumstances.

COUNT II  
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
AGAINST CASTRO BY BLISH.

80. Plaintiffs adopt and reallege the allegations in paragraphs 1 through 70 above as if fully set forth herein.

81. This is an action BLISH against CASTRO and PHMD for intentional infliction of emotional distress related to his outrageous, intentional, malicious, and repugnant undertakings to file a false criminal report with the Seminole County Sherriff's Department against BLISH and his continuous behavior to abuse the legal system to exact his revenge on her because she decided that she could no longer bear his abuse.

82. CASTRO, as BLISH's primary care physician, had a fiduciary and intimate relationship with BLISH and had firsthand and personal knowledge about

her depression, anxiety, and other psychological disorders, which put him in a unique position to take revenge on his former victim of abuse.

83. CASTRO used his trusted knowledge of BLISH's medical condition as a weapon to fabricate charges against her and took steps to provide false and misleading information to the Seminole County Sherriff's Department about the prescription medication that he prescribed for her.

84. CASTRO hoodwinked the Seminole County Sherriff's Department and caused the law enforcement agency to believe that BLISH illegally prescribed medication for herself (i.e., without CASTRO's knowledge and approval) and submitted prescriptions and prescription refills to her pharmacy so she can take her medication.

85. CASTRO's intentional, malicious, and repugnant behavior resulted in BLISH being wrongfully arrested, incarcerated, and charged with multiple felonies.

86. CASTRO knew, at the time he embarked on this process of seeking revenge against BLISH, that the statements he was making were false and that there was no evidence to support the allegations but made them anyway because it was his aim and objective to cause BLISH to have an emotional breakdown and possibly consider suicide because of the nature of the charges coupled with her depression, anxiety, and other psychological disorders.

87. In addition to being arrested, incarcerated, and charged with multiple felonies, BLISH immediately became unemployable (she could not obtain a job to support herself because of these felony charges.

88. BLISH has suffered, and continues to suffer, tremendous harm as a direct and proximate result of CASTRO's actions, including but not limited to (i) PTSD; (ii) increased depression; (iii) increased anxiety; (iv) an inability to obtain gainful employment in the medical field or other profession as a result of the negative history created by CASTRO's behavior; (v) mental anguish from not being able to seek medical treatment from local physicians as a result of this series of events; and (vi) mental anguish related to her inability to have prescription medications filled at certain pharmacies.

WHEREFORE, JENNIFER L. BLISH respectfully requests that this Court fully enter judgment in her favor and against IVAN JOSE CASTRO and PHMD permissible under Florida law, including an award of punitive damages, together with such further and additional relief the Court deems just under the circumstances.

COUNT III  
ABUSE OF PROCESS

89. Plaintiffs adopt and reallege the allegations in paragraphs 1 through 70 above as if fully set forth herein.

90. This is an action against Defendants for abuse of process under Florida law.

91. As stated above, the Defendants filed a false report with the Seminole County Sherriff's Department and the Winter Park Drug Enforcement Agency against both SELBY and BLISH.

92. An official legal proceeding was initiated against SELBY and BLISH because of the Defendants' decision to fabricate a criminal claim, which was done for the sole purpose of causing harm to SELBY and BLISH.

93. Defendants' actions were an illegal, improper, and perverted use of the criminal legal process under Florida.

94. Criminal proceedings were commenced because of the Defendants' actions, and that proceeding was adjudicated on the merits and concluded favorably for SELBY and BLISH, and thus there was a bona fide termination of those proceedings favorable to SELBY and BLISH.

95. Defendants acted with malice against SELBY and BLISH when he decided to undertake the action described above.

96. Defendants were the legal cause of the criminal proceedings that were commenced against both SELBY and BLISH.

97. SELBY and BLISH have suffered, and continue to suffer, tremendous harm as a direct and proximate result of the Defendants' actions, including but not

limited to (i) PTSD; (ii) increased depression; (iii) increased anxiety; (iv) an inability to obtain gainful employment in the medical field or other profession as a result of the negative history created by the Defendants' behavior; (v) mental anguish from not being able to seek medical treatment from local physicians as a result of this series of events; and (vi) mental anguish related to her inability to have prescription medications filled at certain pharmacies.

WHEREFORE, AMANDA SELBY and JENNIFER L. BLISH respectfully request that this Court fully enter judgment in their favor and against both Defendants permissible under Florida law, including an award of punitive damages, together with such further and additional relief the Court deems just under the circumstances.

COUNT IV  
MALICIOUS PROSECUTION

98. Plaintiffs adopt and reallege the allegations in paragraphs 1 through 70 above as if fully set forth herein.

99. This is an action against Defendants for malicious prosecution under Florida law.

100. As stated above, Defendants filed a false report with the Seminole County Sherriff's Department and the Winter Park Drug Enforcement Agency against both SELBY and BLISH.

101. An official legal proceeding was initiated against SELBY and BLISH because of the Defendants' decision to fabricate a criminal claim, which was done for the sole purpose of causing harm to SELBY and BLISH.

102. The Defendants' actions were an illegal, improper, and perverted use of the criminal legal process under Florida.

103. Criminal proceedings were commenced because of the Defendants' actions, and that proceeding was adjudicated on the merits and concluded favorably for SELBY and BLISH, and thus there was a bona fide termination of those proceedings favorable to SELBY and BLISH.

104. Defendants acted with malice against SELBY and BLISH when he decided to undertake the action described above.

105. Defendants were the legal cause of the criminal proceedings that were commenced against both SELBY and BLISH.

106. SELBY and BLISH have suffered, and continue to suffer, tremendous harm as a direct and proximate result of the Defendants' actions, including but not limited to (i) PTSD; (ii) increased depression; (iii) increased anxiety; (iv) an inability to obtain gainful employment in the medical field or other profession as a result of the negative history created by the Defendants' behavior; (v) mental anguish from not being able to seek medical treatment from local physicians as a

result of this series of events; and (vi) mental anguish related to her inability to have prescription medications filled at certain pharmacies.

WHEREFORE, AMANDA SELBY and JENNIFER L. BLISH respectfully request that this Court fully enter judgment in their favor and against both Defendants permissible under Florida law, including an award of punitive damages, together with such further and additional relief the Court deems just under the circumstances.

COUNT V  
GROSS NEGLIGENCE

107. Plaintiffs adopt and reallege the allegations in paragraphs 1 through 70 above as if fully set forth herein.

108. This is an action against Defendants for gross negligence under Florida law.

109. As stated above, Defendants filed a false report with the Seminole County Sherriff's Department and the Winter Park Drug Enforcement Agency against both SELBY and BLISH.

110. An official legal proceeding was initiated against SELBY and BLISH because of Defendants' decision to fabricate a criminal claim, which was done for the sole purpose of causing harm to SELBY and BLISH.

111. Defendants' actions were an illegal, improper, and perverted use of the criminal legal process under Florida.

112. Criminal proceedings were commenced because of the Defendants' actions, and that proceeding was adjudicated on the merits and concluded favorably for SELBY and BLISH, and thus there was a bona fide termination of those proceedings favorable to SELBY and BLISH.

113. Defendants acted with malice against SELBY and BLISH when he decided to undertake the action described above.

114. Defendants were the legal cause of the criminal proceedings that were commenced against both SELBY and BLISH.

115. Defendants' conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the life, safety, or rights of persons exposed to such conduct, as articulated in §758.72, Florida Statutes.

116. SELBY and BLISH have suffered, and continue to suffer, tremendous harm as a direct and proximate result of the Defendants' actions, including but not limited to (i) PTSD; (ii) increased depression; (iii) increased anxiety; (iv) an inability to obtain gainful employment in the medical field or other profession as a result of the negative history created by the Defendants' behavior; (v) mental anguish from not being able to seek medical treatment from local physicians as a

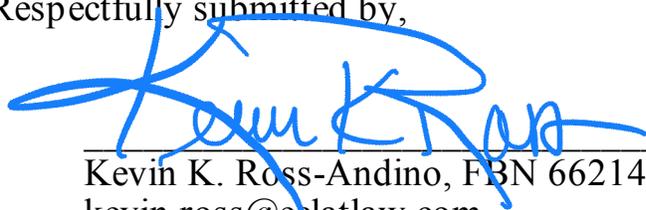
result of this series of events; and (vi) mental anguish related to her inability to have prescription medications filled at certain pharmacies.

WHEREFORE, AMANDA SELBY and JENNIFER L. BLISH respectfully request that this Court fully enter judgment in their favor and against both Defendants permissible under Florida law, including an award of punitive damages, together with such further and additional relief the Court deems just under the circumstances.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury for all issues triable before a jury under Florida law.

Respectfully submitted by,



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