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**IN THE CIRCUIT COURT, FOURTH JUDICIAL CIRCUIT IN AND FOR CLAY
COUNTY, FLORIDA**

CASE NO.:

**ROLAND MASTANDREA,
Plaintiff,**

v.

**SHERRI SNOW,
Defendant.**

_____ /

COMPLAINT

COMES NOW the Plaintiff, ROLAND MASTANDREA, an individual, and sues the Defendant, SHERRI SNOW, an individual, and alleges as follows:

THE PARTIES

1. Plaintiff, Roland Mastandrea (“Plaintiff”), is a resident of the State of Florida. Plaintiff is a member of the city council for the town of Orange Park, Florida.
2. Under information and belief, Defendant, Sherri Snow (“Snow”), is a natural person residing in the town of Orange Park, Clay County, Florida, and is sui juris in all respects.
3. Plaintiff and Defendant together hereinafter as The Parties.
4. Between (dates), Defendant Snow made false statements about Plaintiff that were published to third parties. These false statements were made for the purpose of diminishing Plaintiff’s reputation in his immediate community and were made with reckless disregard for their veracity as well as with actual malice.

JURISDICTION

5. Plaintiff, Roland Mastandrea, is a resident of the State of Florida.
6. Defendant, Sherri Snow, is a resident of the State of Florida.
7. The situs of the event giving rise to this cause of action is within the State of Florida and within the jurisdiction of this Court.

8. This is an action in excess of thirty thousand dollars (\$30,000.00) not including attorney's fees and costs.

VENUE

9. Venue is proper because Plaintiff is a resident of the State of Florida.
10. Under information and belief, Defendant, Sherri Snow is a resident of the State of Florida.
11. The situs of the event giving rise to the underlying cause of action occurred within the county of Clay, and within the jurisdiction of this Court.

GENERAL ALLEGATIONS

12. Plaintiff has been a motivated and enthusiastic member of the city council of Orange Park and has operated with the sole interest of increasing tax revenue for the city.
13. Plaintiff became involved with the idea of redeveloping approximately 10 acres of property that were not being employed toward their best economic use.
14. The redevelopment was proposed by Provision Impact Ventures, a developer, and Plaintiff considered the project a good idea for the future economy of the city he represents at city council.
15. Unfortunately, a group of vociferous citizens have taken their political speech beyond its Constitutional protections with respect to Plaintiff, much to the damage of reputation to Plaintiff.
16. One such citizen has been Defendant Snow.
17. On or about March 19, 2020, Snow, while near the entrance way at Town Hall in Orange Park, Florida published to several individuals' defamatory statements about Plaintiff.

18. Snow's statements were made with knowledge or with reckless disregard as to their falsity.
19. Snow's statements were made for the purpose of diminishing Plaintiff's reputation in the immediate community.
20. Under information and belief, Snow's false statements included that Plaintiff was "on the take" with respect to the Provision Impact Ventures application for Rezoning No. R-1-2020, also known as the Orange Park Plaza project.
21. Additional false statements made by Snow with knowledge of their falsehood include that Plaintiff is or was working for the developer.
22. Snow made false statements that Plaintiff was on the developer's payroll.
23. As a result of the false statements published by Snow about Plaintiff to third parties, Plaintiff experienced actual damages.

COUNT I
DEFAMATION PER SE
(Slander per se)

Defendant by reference to the allegations in paragraphs 1 through 23 of this Complaint.

24. This is an action for damages against Defendant that exceeds Thirty Thousand (\$30,000.00) Dollars, for defamation per se.
25. Snow, orally published false statements about Plaintiff to third parties near the entrance way at Town Hall in Orange Park, Florida.
26. The false statements were calculated to defame or diminish the reputation of Plaintiff in his immediate community and within his capacity.
27. The false statements were made with knowledge or their falsity or with reckless disregard as to their veracity.

28. The false statements impute to the Plaintiff behavior or characteristics that are incompatible with the proper conduct of his business, profession, and office.
29. The false statements also impute to the Plaintiff the commission of a crime.
30. As a result of the defamatory publications, Plaintiff has suffered general damages.

PRAYER

WHEREFORE, it is prayed that this Honorable Court accept jurisdiction of the subject matter and parties, and enter judgment for damages, costs, prejudgment interest and for any other such relief as might be appropriate.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury trial on all issues so properly triable.

Respectfully submitted,

CERTIFICATE OF SERVICE

I certify that a copy hereof has been furnished to Sherri Snow.

/s/JackAndreasKrumbein

Krumbein Law PLLC

12724 Gran Bay Parkway West, Suite 410

Jacksonville, Florida 32258

Tel: 407-800-7589

Email: jack@jackandreaskrumbein.com

Florida Bar No.: 0103068

Attorney for Plaintiff