

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT,  
IN AND FOR PINELLAS COUNTY, FLORIDA  
CIVIL DIVISION**

**PAUL RICHARDS and  
LAUREN PURDIN**

**Plaintiffs,**

**Case No.:**

**vs.**

**RACHEL WEEKS and  
STEPHEN WEEKS**

**Defendants.**

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**VERIFIED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF**

COMES NOW the Plaintiffs, PAUL RICHARDS and LAUREN PURDIN by and through undersigned counsel, and files this Complaint against Defendants, RACHEL WEEKS and STEPHEN WEEKS, and states in support as follows:

**PARTIES**

1. Plaintiff Paul Richards (hereinafter "Richards") is natural person residing in Pinellas County, Florida.
2. Plaintiff Lauren Purdin (hereinafter "Purdin") is a natural person residing in Pinellas County, Florida.
3. Defendant Rachel Weeks is a natural person residing in California.
4. Defendant Stephen Weeks is a natural person residing in California.

5. Richards and Purdin are collectively referred to herein as Plaintiffs. Rachel Weeks and Stephen Weeks are collectively referred to herein as Defendants. Plaintiffs and Defendants are collectively referred to herein as the “Parties.”

#### JURISDICTION

6. This Court has subject matter jurisdiction over this dispute because the Complaint seeks damages in excess of \$30,000.00, excluding interest, costs and attorney’s fees.

7. The Court has personal jurisdiction over Defendants. Specifically, both Defendants maintained minimum contacts with Florida and committed intentional torts aimed at Plaintiffs and the forum state of Florida, causing harm that the Defendants actually or constructively anticipated would be suffered in Florida. *See Calder v. Jones*, 465 U.S. 783, 104 S. Ct. 1482 (1984); Fla. Stat. § 48.193(1)(a); *see also e.g. Acquadro v. Bergeron*, 851 So. 2d 665 (Fla. 2003) (allegations that out-of-state defendant made defamatory telephonic communications targeting a Florida recipient concerning the plaintiff were sufficient to form the basis for personal jurisdiction within Florida).

8. All conditions precedent to maintaining this action have been performed, excused, waived, or are futile.

#### VENUE

9. Venue in Pinellas County, Florida is proper in this action under Fla. Stat. § 47.011 because Plaintiffs reside in Pinellas County and the acts, occurrences, and omissions giving rise to this claim occurred in Pinellas County.

#### FACTS IN SUPPORT OF CLAIM

10. This matter consists of an action by Plaintiffs against Defendants for Defamation (Slander Per Se and Libel Per Se) and Tortious Interference with Business, Employment, and Prospective Economic Relationships.

11. Richards is an emergency medicine doctor based in Pinellas County, Florida. As a doctor, Richards has developed extensive customer goodwill in the area, including in the hospitals at which he is employed.

12. Purdin is a licensed massage therapist based in the counties of Pinellas and Hillsborough, Florida. As a massage therapist, has developed extensive customer goodwill in the area, including through her business, Purdin Massage.

13. Prior to the occurrence of facts that gave rise to the instant claims, Plaintiffs were friends with an individual named Stephen Weeks. However, that friendship soured on or around June 25, 2019, when Stephen Weeks called Richards to demand that Plaintiffs stop associating with a family member (Katie Weeks—Stephen Weeks' sister) and blaming Plaintiffs, wrongfully, for certain personal life and career decisions that Katie Weeks had allegedly made.

14. On or around June 27, 2018, Rachel Weeks—sent a text message to Purdin that indicated an intention to harass and antagonize Plaintiffs.

15. After miscellaneous communications between Stephen Weeks and Richards on or around July 13, 2019, Stephen Weeks called Richards to accuse Plaintiffs of condoning elements of Katie Weeks' lifestyle and career with which Stephen Weeks disagreed and further falsely accusing Richards of using cocaine. On information and belief, Rachel Weeks listened to this entire conversation. On or around the following day, July 14, 2019,

Stephen Weeks called Plaintiff and made various insults and threats of physical harm. Stephen Weeks followed up this call with a series of hostile text messages that did not end until Richards suggested that he would take the matter up with law enforcement.

16. Richards blocked Stephen Weeks' number from contacting Richards' phone. However, around this time (July 14, 2019), Stephen Weeks' spouse—Defendant Rachel Weeks—began to harass and insult Plaintiffs via text message, which prompted Richards to block Rachel Weeks' number as well. Defendants generally left Plaintiffs alone until on or around December 7, 2019, when Defendants ramped up their campaign to harass, defame, and disparage Plaintiffs to third parties as set forth more particularly below.

17. On or around December 7, 2019, Defendants left a defamatory and misleading review on Purdin's online business listing with Google, leaving the lowest rating possible and stating "Don't let this disgusting women touch you." *See* attached Exhibit A. Purdin is a massage therapist. The Google review by Defendants is false in that it implies that one or both of the Defendants utilized Purdin's services and imputes that Purdin touches her clients in an inappropriate manner, which is absolute false and clearly disparaging to the professional reputation of a massage therapist. Defendants published the review with actual malice against Plaintiffs and/or with reckless disregard as to the truth or falsity of the allegation. Additionally, Defendants published the review with the intention of causing actual and prospective customers and clients of Purdin to cease or refrain from doing business with Purdin.

18. On or around December 18, 2019, Plaintiffs discovered Defendants' defamatory Google review. Richards messaged Stephen Weeks asserting that the review constituted harassment and asked Defendants to stop. After receiving no response, Richards messaged

once again stating that he feels he has been left with little choice but to file for a restraining order, whereupon Stephen Weeks responded mostly with insults.

19. On or around December 19, 2019, Richards attempted to contact Stephen Weeks via telephone, but he did not pick up. Later that day, Defendants edited their Google review of Purdin's business to state "Don't leave a bad review because if you do the owner's husband will threaten you. It happened to me! Dear owners husband who contacts me with threats, google review are not owned by you." See attached Exhibit B. The edited Google review of Defendants is false and tends to disparage Plaintiffs and accuse them of violating the Consumer Review Fairness Act by imputing that they have retaliated against a customer or client for leaving a *bona fide* review, which is false. Defendants published the review with actual malice against Plaintiffs and/or with reckless disregard as to the truth or falsity of the allegation. Additionally, Defendants published the review with the intention of causing actual and prospective customers and clients of Purdin to cease or refrain from doing business with Purdin.

20. On or around December 20 through December 22, 2019, Google removed Defendants' review of Purdin's business for violation of Google's terms of service.

21. On or around December 20, 2019, Richards filed a petition against stalking in Pinellas County, Florida, Case No. 19-011390-FD, concerning Defendants conduct. That petition was denied. However, in that petition, Richards expressed the following: "I genuinely fear [Weeks'] next step is to do this to the hospital where I am employed," which proved eerily prescient as described below.

22. On or around December 22, 2019, Defendants called Richards' employer—Northside Hospital in St. Petersburg, Florida, Emergency Department (hereinafter, "Northside Hospital")—to make a number of false and disparaging allegations about Richards with the goal of damaging Richards' professional reputation and causing adverse consequences to Richards' relationship with his employer and his career generally. Defendants initially spoke with a Northside Hospital unit secretary to falsely accuse Richards of getting drunk and committing acts of domestic violence against his own spouse, including drawing a firearm on his spouse. The defamatory call by Defendants is false in that it accuses Richards of acts that are violations of criminal law, incompatible with the professional ethics of a doctor, and generally viewed by an ordinary person as damaging to one's reputation in the community. Defendants made the defamatory call with actual malice against Plaintiffs and/or with reckless disregard as to the truth or falsity of the allegations. Additionally, Defendants made the defamatory call with the intention of causing professional reputational harm to Richards and interfering with Plaintiff's relationship with his employer, colleagues, and patients.

23. The unit secretary who received the defamatory call from Defendants directed Defendants to the nurse manager. Defendants proceeded to call the nurse manager and left a recorded voice message falsely accusing Richards of the following:

- a. that on December 18, 2019, Richards called Stephen Weeks (referenced in the call as a law enforcement agent) while "absolutely wasted drunk with threats that he had a loaded weapon";

b. that Richards was “drinking too much,” is a “gun aficionado,” and that Stephen Weeks is worried about Richards’ “personal state because of the alcoholism”;

c. and that Richards may be going to work as an emergency room doctor intoxicated.

Defendants concluded the call by stating that Northside Hospital “may want to do a check-up on [Richards’] mental health” and inviting Northside Hospital to reach Defendants with any questions.

24. The defamatory voicemail by Defendants is false in that it accuses Richards of acts that are violations of criminal law, committing professional malpractice, having a disease, and not having the mental and ethical fitness to be an emergency room doctor, among other facts that tend to harm one’s personal and professional reputation in the community. Defendants made the defamatory voicemail with actual malice against Plaintiffs and/or with reckless disregard as to the truth or falsity of the allegations. Additionally, Defendants made the defamatory voicemail with the intention of causing professional reputational harm to Richards and interfering with Richards’ relationship with his employer, colleagues, and patients.

25. On or around December 31, 2019, Richards was informed by his co-workers concerning Defendants’ defamatory call and voicemail to Northside Hospital. The nurse manager who received the voicemail permitted Richards to record the voicemail, the entire contents of which are recorded and available for the Court to review in this matter.

26. Throughout December 2019 and January 2020, Defendants left fake reviews and false statements concerning Purdin and her business on Yelp that:

a. Urged customers not to “waste your time with this dishonest, disgusting, unprofessional disgraceful woman”;

b. Stated that Purdin was the reviewer’s husband’s massage therapist for a about a year and that Purdin caused his condition to worsen through professional malpractice;

c. Urged customers not to “bring your sisters or daughters around [Purdin], as she may encourage a career in prostitution or pornography” as well as stating that Richards would “threaten you with a restraining order if you leave a bad review”; and,

d. Further accusing Purdin of professional malpractice in text displayed next to a photo of overflowing garbage dumpsters.

*See Exhibit C, Defamatory Yelp Posts attached hereto.*

27. The Defamatory Yelp Posts by Defendants are false in that they accuse Purdin of committing professional malpractice, grooming women and girls for sex work, and other facts that tend to harm one’s personal and professional reputation in the community. The Posts further falsely accuse Richards of engaging in baseless litigation against bona fide reviewers of business. Defendants made the Defamatory Yelp Posts with actual malice against Plaintiffs and/or with reckless disregard as to the truth or falsity of the allegations. Additionally, Defendants published the review with the intention of causing actual and

prospective customers and clients of Purdin to cease or refrain from doing business with Purdin.

28. From June 25 through June 28, 2020, Defendants posted additional defamatory materials on Purdin's Google My Business page. *See attached* Exhibit D, Defamatory Google My Business Posts. These included adding photos of dumpsters with overflowing garbage to the business profile, falsely accusing Plaintiffs of helping commit insurance fraud, and falsely accusing Plaintiffs of supporting child pornography.

29. The Defamatory Google My Business Posts by Defendants are false in that they accuse Plaintiffs of acts that are violations of criminal law, acts of dishonesty, and other facts that tend to harm one's personal and professional reputation in the community. Defendants made the Defamatory Google My Business Posts with actual malice against Plaintiffs and/or with reckless disregard as to the truth or falsity of the allegations. Additionally, Defendants made the Defamatory Google My Business Posts with the intention of causing professional reputational harm to Plaintiffs and interfering with Plaintiffs relationships with customers, employers, and actual or prospective business relationships.

30. As a direct result of Defendants' acts and omissions described herein, Plaintiffs have been damaged.

31. By virtue of Defendants' actions, Plaintiffs have retained counsel and are obligated to pay reasonable legal fees.

**COUNT I—DEFAMATION (LIBEL PER SE)**  
**PLAINTIFFS AGAINST DEFENDANTS**

32. Plaintiffs incorporate by reference Paragraphs 1 through 31 above as if set forth fully herein.

33. Defendants published the Defamatory Google Review attached as Exhibit A, the Defamatory Edited Google Review attached as Exhibit B, the Defamatory Yelp Posts attached as Exhibit C, and the Defamatory Google My Business Posts attached as Exhibit D.

34. The subject matter of the defamatory materials concerning Plaintiffs is substantially and materially false.

35. The defamatory communications charge Purdin with violations of law (including infamous crimes), touching clients inappropriately, and committing professional malpractice; tends to subject Purdin to hatred, distrust, ridicule, contempt, or disgrace; and tends to injure Purdin in her trade or profession.

36. The defamatory communications charge Richards with violations of law (including infamous crimes) and bringing baseless litigation against *bona fide* reviewers of services; tends to subject Richards to hatred, distrust, ridicule, contempt, or disgrace; and tends to injure Richards in his trade or profession.

37. Defendants' defamatory communications were made with actual malice and/or with reckless disregard for the truth or falsity of allegations made.

38. As a result of Defendants' defamatory communications, Plaintiffs have suffered actual damages.

WHEREFORE, Plaintiffs respectfully request that this Court find Defendants guilty of defamation (libel per se) and enter an order enjoining Defendants to cease further disparaging and defamatory communications concerning Plaintiffs to third parties along with an award of damages caused by Defendants' wrongful acts, including interest, costs, and any other relief the Court deems just and proper. Plaintiffs additionally seek reasonable or, in the alternative, actual attorney's fees as special damages. Plaintiffs reserve the right to amend this Complaint to seek punitive damages.

**COUNT II—DEFAMATION (SLANDER PER SE)**  
**RICHARDS AGAINST DEFENDANTS**

39. Richards incorporates by reference Paragraphs 1 through 31 above as if set forth fully herein.

40. Defendants made the Defamatory Call and Defamatory Voicemail to Northside Hospital targeting Richards and his employment there.

41. The subject matter of the Defamatory Call and Defamatory Voicemail concerning Richards is substantially and materially false.

42. The Defamatory Call and Defamatory Voicemail charges Richards with violations of law, including infamous crimes; tends to subject Richards to hatred, distrust, ridicule, contempt, or disgrace; and tends to injure Richards in his trade or profession.

43. Defendants' Defamatory Call and Defamatory Voicemail were made with actual malice and/or with reckless disregard for the truth or falsity of allegations made.

44. As a result of Defendants' Defamatory Call and Defamatory Voicemail, Richards has suffered actual damages.

WHEREFORE, Richards respectfully requests that this Court find Defendants guilty of defamation (slander per se) and enter an order enjoining Defendants to cease further disparaging and defamatory communications concerning Plaintiffs to third parties, including but not limited to his employer, along with an award of damages caused by Defendants' wrongful acts, including interest, costs, and any other relief the Court deems just and proper. Plaintiff additionally seeks reasonable or, in the alternative, actual attorney's fees as special damages. Plaintiff reserves the right to amend this Complaint to seek punitive damages.

**COUNT III—TORTIOUS INTERFERENCE WITH BUSINESS, EMPLOYMENT, AND  
PROSPECTIVE ECONOMIC RELATIONSHIPS  
PLAINTIFFS AGAINST DEFENDANTS**

45. Plaintiffs incorporate by reference Paragraphs 1 through 44 above as if set forth fully herein.

46. Defendants were aware that Richards is a licensed medical doctor who practiced at Northside Hospital and treated patients throughout Tampa Bay.

47. Defendants were aware that Richards had actual business and prospective economic relationships with healthcare professionals, hospitals, and patients in the Tampa Bay area.

48. Defendants were aware that Purdin is a massage therapist who practices in Tampa Bay and had actual business and prospective economic relationships with customers and clients in the Tampa Bay area.

49. Defendants intentionally and unjustifiably interfered with the above-referenced relationships by publishing the Defamatory Google Review attached as Exhibit A, the Defamatory Edited Google Review attached as Exhibit B, the Defamatory Call, the Defamatory voicemail, the Defamatory Yelp Reviews attached as Exhibit C, and the

Defamatory Google My Business Posts attached as Exhibit D, targeting specific audiences in Florida through the method of publication.

50. As a result of Defendants' interference, Plaintiffs have been damaged.

WHEREFORE, Plaintiffs respectfully request that this Court enter an order finding that Defendants committed tortious interference and enjoining Defendants to cease further disparaging and defamatory communications concerning Plaintiffs to third parties and to cease further interference with Plaintiffs' and employment, economic, or business relationships, actual or prospective, along with an award of damages caused by Defendants' acts, including interest, costs, and any other relief the Court deems just and proper. Plaintiffs additionally seek reasonable or, in the alternative, actual attorney's fees as special damages. Plaintiffs reserve the right to amend this Complaint to seek punitive damages.

**VERIFICATION**

I, Paul Richards, declare that the facts set forth in the foregoing Complaint are true and accurate to the best of my knowledge.

Jun 30, 2020  
Date: \_\_\_\_\_

Signed:   
Paul Richards (Jun 30, 2020 12:04 EDT)

Paul Richards

I, Lauren Purdin, declare that the facts set forth in the foregoing Complaint are true and accurate to the best of my knowledge.

Jun 30, 2020  
Date: \_\_\_\_\_

Signed:   
Lauren Purdin (Jun 30, 2020 12:09 EDT)

Lauren Purdin

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury on all issues so triable.

Dated: July 1, 2020

Respectfully Submitted,

By: /s/ Brian Calciano  
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Fla. Bar No. 0108879  
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**EXHIBIT A**

**DEFAMATORY GOOGLE REVIEW**



UPDATES

MENU

REVIEWS

PHOTOS

ABOUT

All

feeling 3



**Samantha Bowen**

2 reviews



an hour ago

Most professional and relaxing experience. She is the most warm and caring individual, and the room was clean and beautiful. Will be returning. 😊



**Rachel Weeks**

2 reviews



a week ago

Don't let this disgusting woman touch you.



1



**Purdin Massage (Owner)**

a year ago

Thank you!



**CPO Sharkey**

Local Guide · 186 reviews



8 months ago

Lauren did an OUTSTANDING job! She asked my needs



**EXHIBIT B**

**DEFAMATORY REVISED GOOGLE REVIEW**

×  **Rachel Weeks**  
2 reviews



a day ago

Don't leave a bad review because if you do the owner's husband will threaten you. It happened to me!  
Dear owners husband who contacts me with threats , google reviews are not owned by you.

 1 

 **Purdin Message (Owner)**  
a year ago

Thank you!

**EXHIBIT C**

**DEFAMATORY YELP POSTS**



# Purdin Massage



**Rachel W.**

 0  1  1

19 days ago

 Updated Review

Don't waste your time with this dishonest, disgusting, unprofessional disgraceful woman.

1 Previous Review

24 days ago

Lauren was my husband's massage therapist for about a year maybe more and his condition did not improve under her therapy it actually got worse from the wrong information

 Useful 0

 Funny 0

 Cool 0

 Send Compliment



Nearby



Search



Me



Delivery



Collections





# Purdin Massage



**Stephen W.**

 0  2  0

19 days ago

Don't bring your sisters or daughters around her, as she may encourage a career in prostitution or pornography. Her husband may also threaten you with a restraining order if you leave a bad review. I guess thats illegal now.

 Useful 0

 Funny 0

 Cool 0

 Send Compliment

  
Nearby

  
Search

  
Me

  
Activity

  
Collections



Rachel W.

📍 0 🌟 1 📷 1

📷 1

24 days ago

Lauren was my husband's massage therapist for about a year maybe more and his condition did not improve under her therapy it actually got worse from the wrong information she continually gave him. She spoke to him as though she were a doctor and told him, at one point that, his tibia was likely fractured. Which I think is out of scope of practice for a massage therapist. Once he left Laurens care and went to a chiropractor doctor his this soreness in his issues improved completely. Don't let this know-it-all fool you.



Lauren Purden

💡 Useful 0

😄 Funny 0

😎 Cool 0

🗨️ Send Compliment

📍 Nearby

🔍 Search

👤 Me

🛒 Delivery

🔖 Collections

**EXHIBIT D**

**DEFAMATORY GOOGLE MY BUSINESS POSTS**



R W added a photo to Purdin



Message Inbox

Google My Business 11:29 PM

to me ▾



*Business Profile Photo*  
*added to your profile*

This photo was just added  
to your Business Profile

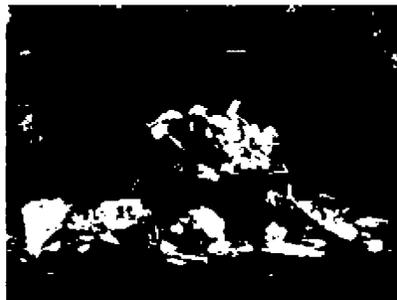


Photo added by

R W

**SEE PHOTO**

Learn more



Ask an expert





## Question about Purdin Massage

3211 W Bay to Bay Blvd, Tampa, FL 33629



RW

Local Guide · 14 reviews · 7 photos



Edited · 4 hours ago

**Lauren and Paul , Did you help Katie weeks with her recent auto insurance neck surgery scam? Tell me how I can sue for 30,000 over a fender bender??? Don't worry I reported her insurance fraud, and included Paul's letter about how he supports her.**



Like



Add an answer publicly



Posting Publicly ⓘ





Go to My Business

## A customer asked a question about your business

← Purdin Massage  
3211 W Bay to Bay Blvd, Tampa, FL 3362...

R W

**Do you support all child por  
nography or just Katie w...**

**Answer now**

R W will be notified when you answer.

Answering questions on your Business Profile helps:

-  Educate people about your business
-  Showcase quality customer service
-  Build relationships with customers

**Answer now**



← Purdin Message



Ask the community

**Do you support all child pornography or just Katie weeks? I'm sure your customers would like to know.**



Like



Answer



Discover



Updates



Search



Collections



More

