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IN THE CIRCUIT COURT OF THE 10TH
JUDICIAL CIRCUIT IN AND FOR
POLK COUNTY, FLORIDA

CASE NO.:

ALBERT WOOD and DEBORAH WOOD,
as Personal Representatives of the Estate of
NAOMI WOOD,

Plaintiffs,

vs.

TEEN CHALLENGE OF FLORIDA, INC.,
ADULT & TEEN CHALLENGE, USA,
DAN WILLIAMS, and HOLLY WILLIAMS

Defendants.
_____/

COMPLAINT

COMES NOW the Plaintiff, ALBERT WOOD and DEBORAH WOOD, individually and as Personal Representatives of the Estate of NAOMI WOOD, Deceased, and sues the Defendants, TEEN CHALLENGE OF FLORIDA, INC, ADULT & TEEN CHALLENGE, USA, DAN WILLIAMS and HOLLY WILLIAMS:

JURISDICITONAL ALLEGATIONS

1. This is an action for wrongful death and monetary damages in excess of Thirty Thousand Dollars ($30,000.00) and is within the jurisdictional limits of this Court.

2. On May 19, 2020, and all times material to this lawsuit, Defendant, TEEN CHALLENGE OF FLORIDA, INC., was a business entity conducting business in the State of Florida, including Polk County.

3. On May 19, 2020, and at all times material to this lawsuit, ADULT & TEEN CHALLENGE, USA was a foreign corporation with its principal place of business in Ozark, Missouri.

4. On May 19, 2020, and always material to this lawsuit, DAN WILLIAMS was a resident of the State of Florida and director of Lakeland Girls Academy.

5. On May 19, 2020, and always material to this lawsuit, HOLLY WILLIAMS was a resident of the State of Florida and director of Lakeland Girls Academy.

6. Plaintiffs, ALBERT WOOD and DEBORAH WOOD, parents of the Deceased, NAOMI WOOD, are the duly appointed Personal Representatives of the Estate of NAOMI WOOD. (A copy of the Order Appointing ALBERT WOOD and DEBORAH WOOD, as Personal Representatives is attached hereto as **Exhibit 1**).

7. Plaintiffs, ALBERT WOOD and DEBORAH WOOD, as Personal Representatives of the ESTATE OF NAOMI WOOD, bring this wrongful death action, in their representative capacity, on behalf of the following survivors and beneficiaries: (1) Albert Wood as surviving father of Naomi Wood; (2) Deborah Wood as surviving mother of Naomi Wood; and (3) The Estate of Naomi Wood.

8. Venue is proper in Polk County, Florida because the events that gave rise to this cause of action occurred in Polk County, Florida.

FACTS COMMON TO ALL ALLEGATIONS

9. On February 4, 2020, Naomi Wood traveled from her parent's home in Vermont to attend Lakeland Girls Academy ("LGA") in Lakeland Florida.

10. LGA advertised itself as a loving, relational, and affordable residential school designed to help girls with adoption issues, at-risk behavior, or substance abuse issues. Naomi's parents were told that LGA would provide a nurturing and loving environment that would promote her positive personal growth and development.

11. At all times material, Lakeland Girls Academy had an obligation to care for Naomi Wood while she resided at their facility. By law, they stood in the place of her parents while she was in the facility and had ultimate responsibility to provide for her care and well-being.

12. Nearly immediately upon arrival at LGA, Naomi began complaining of stomach pain. In the weeks that followed, her stomach pain persisted. In response, LGA provided her over the counter stomach medication, soup, and prayer.

13. Pursuant to LGA protocol, LGA staff were only allowed to administer over the counter medications and prescribed medication for birth control. Any other medications, including prescribed medications for depression were not allowed. Any request to be seen by a doctor was required to be approved by the executive directors, Dan Williams and Holly Williams. Dan and Holly Williams exercised this authority despite having no formal medical qualifications or training. As a result, many medical complaints of LGA residents went unresolved or completely ignored.

14. During Naomi's first 3 weeks at the facility, LGA staff administered over-the-counter stomach medication 6 times. Despite her recurring symptoms, LGA staff never contacted Naomi's parents and never requested Naomi be seen by a doctor or nurse to diagnose her condition.

15. On April 13, 2020, Naomi requested that she be allowed to see a doctor. She reported to staff that she had been experiencing stomach pains "almost every day" since her arrival at LGA.

16. Naomi's request to see a doctor was denied. According to numerous residents it was far too common for girls to be denied medical care and treatment. This denial of basic care and treatment was based in part on the directors' assumptions that such requests were an

attempt for the girls to escape the facility, if only for a short time. LGA and its leadership actively promoted a culture of suspicion, disbelief, and isolation that ultimately led to its residents being unable to access outside medical care and treatment. Moreover, LGA did not request or allow medical professionals to come into the facility to examine or diagnose residents.

17. Naomi's complaints persisted but continued to go unresolved. Rather than permit Naomi to be examined by a doctor or a nurse, LGA continued to ignore her complaints of stomach pain. Her complaints did not subside, they became more frequent. In the remaining 36 days of her life, Naomi requested and was given stomach medication 13 times. In her brief stay at LGA, Naomi was given stomach medication at least 22 times. Despite this, LGA's directors never sought medical treatment for Naomi and never allowed her to speak to a medical professional. Rather than provide any medical treatment, they fed Naomi soup and prayed with her pursuant to LGA policy.

18. On May 18, 2020, Naomi became violently ill. In response, LGA once again provided over-the-counter stomach medication, soup, and prayer. That evening, her roommates asked if they could move her mattress to the floor due to her persistent vomiting. They prayed for Naomi and they all went to sleep. Approximately 1 hour later, Naomi's roommate woke up and heard Naomi wheezing. Out of concern, her roommates contacted LGA staff. And once again, nothing but prayer was administered. According to interviews with her roommates, that night Naomi vomited approximately 7 times. When she vomited, she was coughing and having difficulty breathing.

19. On May 19, 2020, Naomi was instructed to stay in bed due to her illness. That morning, Naomi was administered over-the-counter stomach medication, soup and prayer.

Despite having vomited repeatedly the evening before and having no significant change to her condition, LGA never sought any medical treatment for Naomi.

20. That day brought Naomi no relief. Naomi continued to complain that she did not feel well, she was unable to eat, and she continued to vomit. Once again, rather than seeking medical attention for Naomi, LGA staff administered Pepto-Bismol, and encouraged Naomi to eat soup. She remained in bed all day except when LGA protocol required her to wake for mealtime. After remaining in bed all day, at approximately 5:00 P.M. Naomi was seen by her roommate laying facedown and making strange gurgling noises.

21. Shortly thereafter, at approximately 6:00 PM, LGA staff attempted to wake Naomi for her required daily shower. Naomi was unresponsive. According to staff accounts, Naomi was discovered to have a faint pulse and seemed to be breathing shallowly. Having no authority to call for medical help for Naomi, staff called director Dan Williams to seek permission to call 911. By the time help came, it was too late for Naomi. She had complained of stomach pain for over 3 months. She had been violently ill for more than 24 hours. The paramedics who found her unresponsive and dying in her room were the first and only medical professionals LGA allowed her to see.

22. Naomi Wood died the evening of May 19, 2020.

23. Throughout Naomi's stay at LGA, Naomi's parents were contacted only once to notify them that Naomi had mentioned that she was having chronic stomach pains and to inquire whether they knew the cause or anything that could help Naomi. This contact came on April 15, 2020 in a one paragraph e-mail written to Naomi's mother. In this e-mail, LGA never informed the parents that Naomi had requested to see a doctor, that LGA had been administering over the counter stomach medication to Naomi, or that this medication did not

seem to be resolving the issue. After this single communication, LGA never informed Naomi's parents that her stomach pain continued and never informed her parents that they had been administering medications with no success.

24. After her death, the details of Naomi's illness were never disclosed to her parents. Her parents were never told that she had been given stomach medication, that she had been violently ill for more than 24 hours prior to her death or that she was vomiting. Rather than the truth, Naomi's parents were told that she had suffered a seizure and had died suddenly in her sleep.

25. It was not until the results of an investigation by the Florida Department of Children and Families was leaked in the press that Naomi's parents learned of the details of Naomi's illness and death.

26. An Investigation into the treatment of Naomi Wood by the Florida Department of Children and Families concluded that Naomi's death was consistent with a delay in seeking care and medical neglect on behalf of Lakeland Girl's Academy.

COUNT I- NEGLIGENCE AGAINST TEEN CHALLENGE OF FLORIDA INC.

27. Plaintiffs allege paragraphs 1-26 as is if fully set forth herein and further state:

28. At all times material hereto, defendant Teen Challenge of Florida Inc., operated Lakeland Girls Academy.

29. Teen Challenge of Florida, Inc., through its employees and agents, had a duty to take all necessary and reasonable actions to care for Naomi Wood and to insure her well-being. At all times while Naomi Wood was within their custody and supervision, Teen Challenge of Florida, Inc. stood in *loco parentis* and had all duties commensurate with this status.

30. Teen challenge of Florida, Inc., breached its duty to Naomi Wood in various ways including, but without limitation:

a. failing to provide reasonable and necessary medical treatment to Naomi;

b. refusing to allow her to see a medical professional when the need was known, or reasonably should have been known;

c. failing to consult with any medical professional to determine whether medical treatment was necessary or advised;

d. failing to properly train, supervise, and instruct its employees regarding the proper monitoring and reporting of medical complaints;

e. failing to create and implement policies and procedures sufficient to protect Naomi Wood (and all residents) from medical neglect;

f. failing to notify and properly advise Albert and Deborah Wood of Naomi's continuing medical complaints;

g. failing to track Naomi Wood's medical complaints over time to ensure that all medical issues were addressed in a timely manner;

h. creating and perpetuating a culture of where girls within their care could not effectively report or seek medical care; and

h. all other ways determined through discovery in this action.

31. As a direct and proximate cause of the negligence of Teen Challenge of Florida, Inc., Naomi Wood died.

32. Plaintiff's Albert Wood and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

a. Mental pain and suffering from the date of injury;
b. Medical and funeral expenses which were incurred due to the decedent's death;
c. Loss of prospective net accumulations of the Estate; and
d. All other damages recoverable under the laws of the State of Florida.

COUNT II- "NEGLIGENCE PER SE" AGAINST TEEN CHALLENGE OF FLORIDA INC. FOR VIOLATING FLORIDA STATUTES SECTION 827.03

33. Plaintiffs allege paragraphs 1-26 and 28-29 as is if fully set forth herein and further state:

34. Florida Statute § 827.03 defines "neglect of a child" as a "caregiver's failure or omission to provide a child with the care, supervision, and services necessary to maintain the child's physical and mental health, including, but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of the child."

35. Teen Challenge of Florida, Inc., through its employees and agents, failed to provide supervision, medicine, and medical services that were essential for the well-being of Naomi Wood. Accordingly, Teen Challenge of Florida, Inc. violated Florida Statute § 827.03.

36. At the time of her death, Naomi Wood was a child and a member of the class of persons that Florida Statute § 827.03 was designed to protect and the injury suffered by Naomi Wood was the type of injury that the statute was aimed at preventing.

37. As a direct and proximate cause of Teen Challenge of Florida, Inc.'s violation of Florida Statute § 827.03, Naomi Wood died.

38. Plaintiff's Albert and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

a. Mental pain and suffering from the date of injury;
b. Medical and funeral expenses which were incurred due to the decedent's death;

c. Loss of prospective net accumulations of the Estate; and
d. All other damages recoverable under the laws of the State of Florida.

COUNT III- "NEGLIGENCE PER SE" AGAINST TEEN CHALLENGE OF FLORIDA INC. FOR VIOLATING FLORIDA STATUTES SECTIONS 409.175 and 409.176

39. Plaintiffs allege paragraphs 1-26 and 28-29 as is if fully set forth herein and further state:

40. Lakeland Girls Academy was a residential "Type-2" child caring agency as defined and governed by Florida Statutes § 409.175 and § 409.176.

41. The stated purpose of these statutes is to "protect the health safety and well being of all children in the state who are cared for by family foster homes, residential child caring agencies, and child placing agencies."

42. Florida Statutes § 409.176(8) specifically states that "[t]he the provisions of chapter 39 and 827 regarding child abuse, abandonment, and neglect…. apply to any facility registered under this section."

43. At the time of her death, Naomi Wood was a child and a member of the class of persons that Florida Statute § 409.175 and 409.176 was designed to protect and the injury suffered by Naomi Wood was the type of injury that the statute sought to prevent.

44. As a direct and proximate cause of Teen Challenge of Florida, Inc.'s violation of Florida Statute § 827.03, Naomi Wood died.

45. Plaintiff's Albert Wood and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

a. Mental pain and suffering from the date of injury;
b. Medical and funeral expenses which were incurred due to the decedent's death;

c. Loss of prospective net accumulations of the Estate; and
d. All other damages recoverable under the laws of the State of Florida.

COUNT IV- NEGLIGENCE AGAINST DAN WILLIAMS

46. Plaintiffs allege paragraphs 1-26 as is if fully set forth herein and further state:

47. At all times material, Dan Williams was an executive director of the Lakeland Girls Academy.

48. As executive director of Lakeland Girl's Academy, Dan Williams was personally and directly responsible for overseeing the care and medical treatment of Naomi Wood and for ensuring that all staff of Lakeland Girl's Academy were properly trained and supervised. Teenage residents of Lakeland Girl's Academy were not permitted to leave the facility for medical treatment without an executive director's specific authorization and consent, and accordingly, Dan Williams was directly responsible for ensuring that Naomi Wood was given access to medical providers.

49. Dan Williams had a duty to take all necessary and reasonable actions to care for Naomi Wood and to ensure that she was provided access to necessary medical treatment and screening. Dan Williams had a duty to ensure that all staff of Lakeland Girl's Academy were properly trained and supervised.

50. Dan Williams breached his duty to Naomi Wood in various ways including, but without limitation:

a. failing to provide reasonable and necessary medical treatment to Naomi;

b. refusing to allow her to see a medical professional when the need was, or reasonably should have been, known;

c. failing to consult with any medical professional to determine whether medical treatment was necessary or advised;

d. failing to properly train, supervise, and instruct employees regarding the proper monitoring and reporting of medical complaints;

e. failing to create and implement policies and procedures sufficient to protect Naomi Wood (and all residents) from medical neglect;

f. failing to notify and properly advise Albert and Deborah Wood of Naomi's continuing medical complaints;

g. failing to track Naomi Wood's medical complaints over time to ensure that all medical issues were addressed in a timely manner; and

h. all other ways determined through discovery in this action.

51. As a direct and proximate cause of the negligence of Dan Williams, Naomi Wood died.

52. Plaintiff's Albert Wood and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

a. Mental pain and suffering from the date of injury;
b. Medical and funeral expenses which were incurred due to the decedent's death;
c. Loss of prospective net accumulations of the Estate; and
d. All other damages recoverable under the laws of the State of Florida.

COUNT V- "NEGLIGENCE PER SE" AGAINST DAN WILLIAMS FOR VIOLATIONS OF FLORIDA STATUTES SECTION 827.03

53. Plaintiffs allege paragraphs 1-26 and 48-49 as is if fully set forth herein and further state:

54. Florida Statute § 827.03 defines "neglect of a child" as a "caregiver's failure or omission to provide a child with the care, supervision, and services necessary to maintain the child's physical and mental health, including, but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of the child."

55. Dan Williams failed to provide supervision, medicine, and medical services that were essential for the well-being of Naomi Wood. Accordingly, Dan Williams violated Florida Statute § 827.03.

56. At the time of her death, Naomi Wood was a child and a member of the class of persons that Florida Statute § 827.03 was designed to protect and the injury suffered by Naomi Wood was the type of injury that the statute was aimed at preventing.

57. As a direct and proximate cause of Dan Williams's violation of Florida Statute § 827.03, Naomi Wood died.

58. Plaintiff's Albert Wood and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

a. Mental pain and suffering from the date of injury;
b. Medical and funeral expenses which were incurred due to the decedent's death;
c. Loss of prospective net accumulations of the Estate; and
d. All other damages recoverable under the laws of the State of Florida.

COUNT VII- NEGLIGENCE AGAINST HOLLY WILLIAMS

59. Plaintiffs allege paragraphs 1-26 as is if fully set forth herein and further state:

60. At all times material, Holly Williams was an executive director of the Lakeland Girls Academy.

61. As an executive director of Lakeland Girl's Academy, Holly Williams was personally and directly responsible for overseeing the care and medical treatment of Naomi Wood and for ensuring that all staff of Lakeland Girl's Academy were properly trained and supervised. Teenage residents of Lakeland Girl's Academy were not permitted to leave the facility for medical treatment without an executive director's specific authorization and consent, and accordingly, she was directly responsible for ensuring that Naomi Wood was given access to medical providers.

62. Holly Williams had a duty to take all necessary and reasonable actions to care for Naomi Wood and to ensure that she was provided access to necessary medical treatment and screening. Holly Williams had a duty to ensure that all staff of Lakeland Girl's Academy were properly trained and supervised.

63. Holly Williams breached her duty to Naomi Wood in various ways including, but without limitation:

a. failing to provide reasonable and necessary medical treatment to Naomi;

b. refusing to allow her to see a medical professional when the need was, or reasonably should have been, known;

c. failing to consult with any medical professional to determine whether medical treatment was necessary or advised;

d. failing to properly train, supervise, and instruct employees regarding the proper monitoring and reporting of medical complaints;

e. failing to create and implement policies and procedures sufficient to protect Naomi Wood (and all residents) from medical neglect;

f. failing to notify and properly advise Albert and Deborah Wood of Naomi's continuing medical complaints;

g. failing to track Naomi Wood's medical complaints over time to ensure that all medical issues were addressed in a timely manner; and

h. all other ways determined through discovery in this action.

64. As a direct and proximate cause of the negligence of Holly Williams, Naomi Wood died.

65. Plaintiff's Albert Wood and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

e. Mental pain and suffering from the date of injury;
f. Medical and funeral expenses which were incurred due to the decedent's death;
g. Loss of prospective net accumulations of the Estate; and
h. All other damages recoverable under the laws of the State of Florida.

COUNT VIII- "NEGLIGENCE PER SE" AGAINST HOLLY WILLIAMS FOR VIOLATIONS OF FLORIDA STATUTES SECTION 827.03

66. Plaintiffs allege paragraphs 1-26 and 61-62 as is if fully set forth herein and further state:

67. Florida Statute § 827.03 defines "neglect of a child" as a "caregiver's failure or omission to provide a child with the care, supervision, and services necessary to maintain the child's physical and mental health, including, but not limited to, food, nutrition, clothing,

shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of the child."

68. Holly Williams failed to provide supervision, medicine, and medical services that were essential for the well-being of Naomi Wood. Accordingly, Holly Williams violated Florida Statute § 827.03.

69. At the time of her death, Naomi Wood was a child and a member of the class of persons that Florida Statute § 827.03 was designed to protect and the injury suffered by Naomi Wood was the type of injury that the statute was aimed at preventing.

70. As a direct and proximate cause of Holly William's violation of Florida Statute § 827.03, Naomi Wood died.

71. Plaintiff's Albert Wood and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

e. Mental pain and suffering from the date of injury;
f. Medical and funeral expenses which were incurred due to the decedent's death;
g. Loss of prospective net accumulations of the Estate; and
h. All other damages recoverable under the laws of the State of Florida.

COUNT IX- NEGLIGENCE AGAINST ADULT & TEEN CHALLENGE, USA

72. Plaintiffs allege paragraphs 1-26 as is if fully set forth herein and further state:

73. Adult & Teen Challenge, USA operates over 200 residential facilities throughout the United States and Canada.

74. At all times material Adult & Teen Challenge, USA owned, operated, and controlled Lakeland Girls Academy.

75. Adult & Teen Challenge, USA, through its employees and agents, had a duty to take all necessary and reasonable actions to care for Naomi Wood and to insure her well-being. At all times while Naomi Wood was within their custody and supervision, Adult & Teen Challenge, USA stood in *loco parentis* and had all duties commensurate with this status.

76. Adult & Teen Challenge, USA, is responsible for creating and implementing policies and procedures, providing training for directors and staff, ensuring compliance with all requisite standards, and ensuring that the facilities are operating in a safe and appropriate manner.

77. At all times material, Adult & Teen Challenge, USA, had a duty to act reasonably in performing these functions and do so in a manner that did not create an unreasonable risk of injury to the residents of its facilities including Naomi Wood. As the owner or operator of Lakeland Girls Academy, Adult & Teen Challenge, USA had a duty to take all necessary and reasonable actions to care for Naomi Wood and to insure her well-being.

78. Adult & Teen Challenge, USA breached its duty to Naomi Wood in various ways including, but without limitation:

a. failing to provide reasonable and necessary medical treatment to Naomi;

b. refusing to allow Naomi to see a medical professional when the need was known, or reasonably should have been known;

c. failing to consult with any medical professional to determine whether medical treatment was necessary or advised;

d. failing to properly train, supervise, and instruct its employees regarding the proper monitoring and reporting of medical complaints;

e. failing to properly ensure compliance with policies and procedures designed to ensure the well-being of residents;

f. failing to create and implement policies and procedures sufficient to protect Naomi Wood (and all residents) from medical neglect;

g. failing to notify and properly advise Albert and Deborah Wood of Naomi's continuing medical complaints;

h. failing to track Naomi Wood's medical complaints over time to ensure that all medical issues were addressed in a timely manner;

i. creating and perpetuating a culture of where girls within their care could not effectively report or seek medical care; and

j. all other ways determined through discovery in this action.

79. As a direct and proximate cause of the negligence of Adult & Teen Challenge, USA, Naomi Wood died.

80. Plaintiff's Al and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

a. Mental pain and suffering from the date of injury;
b. Medical and funeral expenses which were incurred due to the decedent's death;
c. Loss of prospective net accumulations of the Estate; and
d. All other damages recoverable under the laws of the State of Florida.

COUNT X- "NEGLIGENCE PER SE" AGAINST ADULT & TEEN CHALLENGE, USA FOR VIOLATING FLORIDA STATUTES SECTION 827.03

81. Plaintiffs allege paragraphs 1-26 and 74-77 as is if fully set forth herein and further state:

82. Florida Statute § 827.03 defines "neglect of a child" as a "caregiver's failure or omission to provide a child with the care, supervision, and services necessary to maintain the child's physical and mental health, including, but not limited to, food, nutrition, clothing, shelter, supervision, medicine, and medical services that a prudent person would consider essential for the well-being of the child."

83. Adult & Teen Challenge, USA, through its employees and agents, failed to provide supervision, medicine, and medical services that were essential for the well-being of Naomi Wood. Accordingly, Adult & Teen Challenge, USA violated Florida Statute § 827.03.

84. At the time of her death, Naomi Wood was a child and a member of the class of persons that Florida Statute § 827.03 was designed to protect and the injury suffered by Naomi Wood was the type of injury that the statute was aimed at preventing.

85. As a direct and proximate cause of Adult & Teen Challenge, USA's violation of Florida Statute § 827.03, Naomi Wood died.

86. Plaintiff's Al and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

e. Mental pain and suffering from the date of injury;
f. Medical and funeral expenses which were incurred due to the decedent's death;
g. Loss of prospective net accumulations of the Estate; and
h. All other damages recoverable under the laws of the State of Florida.

COUNT XI- "NEGLIGENCE PER SE" AGAINST ADULT & TEEN CHALLENGE, USA FOR VIOLATING FLORIDA STATUTES SECTIONS 409.175 and 409.176

87. Plaintiffs allege paragraphs 1-26 and 74-77 as is if fully set forth herein and further state:

88. Lakeland Girls Academy was a residential "Type-2" child caring agency as defined and governed by Florida Statutes § 409.175 and § 409.176.

89. The stated purpose of these statutes is to "protect the health safety and well-being of all children in the state who are cared for by family foster homes, residential child caring agencies, and child placing agencies."

90. Florida Statutes § 409.176(8) specifically states that "[t]he the provisions of chapter 39 and 827 regarding child abuse, abandonment, and neglect…. apply to any facility registered under this section."

91. At the time of her death, Naomi Wood was a child and a member of the class of persons that Florida Statute § 409.175 and 409.176 was designed to protect and the injury suffered by Naomi Wood was the type of injury that the statute sought to prevent.

92. As a direct and proximate cause of Adult & Teen Challenge, USA's violation of Florida Statute § 827.03, Naomi Wood died.

93. Plaintiff's Al and Deborah Wood, as Personal Representatives of the Estate of Naomi Wood, have in the past and will in the future continue to suffer the following damages:

e. Mental pain and suffering from the date of injury;
f. Medical and funeral expenses which were incurred due to the decedent's death;
g. Loss of prospective net accumulations of the Estate; and
h. All other damages recoverable under the laws of the State of Florida.

Wherefore, Albert and Deborah Wood, as the Personal Representatives of the Estate of Naomi Wood, demand judgment against the above-named Defendants for all damages recoverable under the laws of the State of Florida, including but not limited to, mental pain and suffering, medical and funeral expenses, and loss of prospective net accumulations, and demand trial by jury.

DATED this 27th day of April 2022.

GOLDMAN & DASZKAL, P.A.
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BY: _____
ALEXANDER R. HUNT, ESQ.
FBN: 50206
GREGORY THOMSON, ESQ.
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EXHIBIT 1

Vermont Superior Court
Filed 10/01/21
Windsor Unit

VERMONT SUPERIOR COURT
Windsor Unit
12 The Green
Woodstock, VT 05091
802-457-2121
www.vermontjudiciary.org

PROBATE DIVISION
Case No. 21-PR-05351

Estate of: Naomi M. Wood

LETTERS OF GENERAL ADMINISTRATION

TO: All Interested Persons:

The following person(s) has/have been appointed as:

- ☒ Co - Administrators
- ☐ Executor(s)
- ☐ Administrators
- ☐ Successor Administrator
- ☐ c.t.a. [cum testament annexo, "with Will annexed"]
- ☐ d.b.n. [de bonis non "of assets not (previously administered)"]

Name:	**Address:**
Wood, Albert	
Wood, Deborah	

☐ A Last Will and Testament dated , and Codicil(s) dated (if any), have been admitted for probate.
☒ No Will has been admitted for probate.

This Court appoints you to administer this estate. You shall administer the estate according to the Will and Codicil(s), if any, and the laws of the State of Vermont. You shall file with this Court within 60 days of this appointment an inventory of all the real and personal property of the decedent. You shall serve a copy of this inventory on all parties entitled to notice in this matter. The Court, upon your motion, may extend the filing date of the inventory for an additional 60 days.

Within one year, and annually thereafter, and at such other times as the Court may require, you shall file with the Court a true account of your administration.

You shall perform all your duties according to the Rules of Probate of Procedure and the laws of the State of Vermont.

Electronically signed on 9/30/2021 1:28 PM pursuant to V.R.E.F. 9(d)

Frederick M. Glover
Probate Judge