

HALIFAX LAW GROUP

A Private Law Firm

Telephone: (386) 492-4880
Facsimile: (386) 492-6051

444 SEABREEZE BOULEVARD, SUITE 910
DAYTONA BEACH, FL 32118

office@halifaxlawgroup.com
www.halifaxlawgroup.com

Send all correspondence to:
POST OFFICE BOX 9357
DAYTONA BEACH, FL 32120-9357

February 25, 2013

ORIGINAL VIA CERTIFIED MAIL – RETURN RECEIPT REQUESTED
COPY VIA EMAIL TRANSMISSION: pmj7693@hotmail.com

Peter Johnson
41 Bickwick Lane
Palm Coast, FL 32137-9363

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COPY VIA EMAIL TRANSMISSION: : pmj7693@hotmail.com

Margaret Johnson
41 Bickwick Lane
Palm Coast, FL 32137-9363

Re: Matter Name: Dennis Kline v. Peter Johnson and Margaret Johnson
Matter No: 7421.0001
Case No: TBD

Dear Mr. and Mrs. Johnson:

Please be advised that this law firm has the privilege of representing Dennis Kline in the referenced matter. Please direct any further communication you may have regarding this matter to my attention.

Mr. Kline advises us that, together, the two of you have engaged in a pattern of defamatory conduct regarding Mr. Kline's conduct as the Course Director for the Medical Career Institute where Mr. Johnson was a paramedic student. Over the last ten (10) days, Mr. Johnson has made false allegations about Mr. Kline in that he has stated with certainty that Mr. Kline certified that paramedic students in his class had completed certain hours of course work when, in fact, the students had not actually been in class at all, and that Mr. Kline provided students with copies of tests prior to the tests being taken by them. As you know, both of these allegations are patently false. We have received letters from a multitude of students in the same class as Mr. Johnson, all of whom verify that although classroom hours that were missed, they were not given credit for the missed hours, and they never received any tests prior to having taken the same as part of the coursework. All of the students, including Mr. Johnson, were given the opportunity to have additional classroom time as well to complete any outstanding hours that were needed for certification.

As if the foregoing lies about my client were not enough, you have also made the allegations directly to Richard Gonzalez, the Chief Executive Officer of the Medical Career Institute and Chief Don Petito, the Fire Chief for the Flagler County Fire Department. As a

HALIFAX LAW GROUP

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Peter Johnson
Margaret Johnson
February 25, 2013
Page 2

result of your conduct Mr. Kline was originally terminated from his position with the Medical Career Institute and he was sanctioned by the Flagler County Fire Department as well.

In addition to the foregoing, you have used the false accusations that you have created to threaten my client's license and have indicated that you would report the unfounded accusations to the Department of Health and you have demanded that he personally reimburse you the cost of the paramedic course you took in the approximate amount of \$6,250.00 (Six Thousand Two Hundred Fifty Dollars).

You should be aware that, over the last ten (10) days, Mr. Kline has been able to clear his name with Mr. Gonzalez and with Chief Petito. Suffice it to say, both gentlemen are now fully aware that your accusations against Mr. Kline were wholly unfounded, completely untruthful and designed merely to extort the cost of the paramedic class out of him, personally, because the Medical Career Institute refused to reimburse you for a course that you completed more than forty percent (40%) of and for which you were given every opportunity to continue and complete same. Rather, you elected to terminate your participation in the course so you could attend nursing school instead, and simply wanted your money back.

Be further advised by way of this correspondence that Mr. Kline will not be paying you any money in relationship to your allegations. He is under no obligation to pay you anything and, if you continue to make threats against him in order to extort the funds from him, you will be reported to the criminal authorities and charges of extortion will be filed against you without fail. At this point, Mr. Kline's damages claims against you are in excess of \$10,000.00 (Ten Thousand Dollars) based upon the loss of work he will endure as a result of losing his off-duty work with the Medical Career Institute and he has additional damages for emotional pain and suffering as a result of the harm you have caused to his reputation and good name in the community. Your actions amount to, not only defamation, but the tortious interference with his business relationships, and, if your conduct does not cease and desist, Mr. Kline will seek those damages from you.

At this time, Mr. Kline merely instructs me to advise you that you shall cease and desist all defamatory conduct with respect to the accusations you have made about him as course director related to the paramedic course you are enrolled at Medical Career Institute. You are hereby instructed that you should have no further contact with any employees of the Medical Career Institute or the Flagler County Fire Department. If any employees or other representatives of either of those institutions are contacted by you, it will be presumed that it was for the purpose of defaming my client and swift legal action will follow. If you take any action to notify the Department of Health or any other licensing board, or you engage in any other malicious or abusive conduct based upon the lies that you have already told or ones that you intend to create going forward, Mr. Kline has instructed me to take all legal action available to him to recover damages and to obtain injunctive relief under Florida law, both at law and in equity.

HALIFAX LAW GROUP

A Private Law Firm

Peter Johnson
Margaret Johnson
February 25, 2013
Page 3

This letter will be provided to both Mr. Gonzalez and Chief Petito so they are aware of the status of the disagreement between you and my client. The letter will also be provided to any other person to whom you may potentially spread defamatory information about my client in the future.

If you have any questions whatsoever about the intent of this letter, do not hesitate to contact me. I would welcome the opportunity to explain more fully the causes of action that exist against you and the damages you have caused my client as a result. Should you fail to cease and desist as requested above, then I strongly recommend that you seek legal counsel to protect yourself and, in the interim, that you govern yourself accordingly.

Very truly yours,



K. Judith Lane

Signed in Ms. Lane's absence to avoid delay.

cc: Dennis Kline (via email only)
Richard Gonzalez (via email and U.S. Mail)
Chief Don Petito (via email and U.S. Mail)