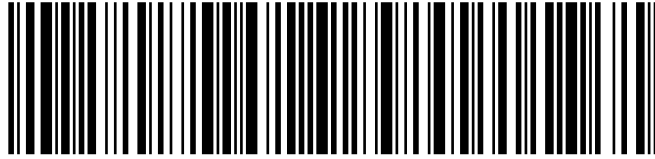

USPS CERTIFIED MAIL

Marie A. Mattox P.A.
203 N. Gadsden Street
Tallahassee Florida 32301



9214 8901 9403 8354 4643 90

BAY COUNTY SHERIFFS OFFICE
C/O: TOMMY FORD SHERIFF
3421 HIGHWAY 77
PANAMA CITY FL 32405-5009

Return Reference Number: Margo Anderson
Username: Emerson Flowers
Client Name:
Case #:
Custom 3:
Custom 4:
Custom 5:

Postage: \$7.6000

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March 26, 2024

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BAY COUNTY SHERIFF'S OFFICE

c/o Tommy Ford, Sheriff

3421 N. Highway 77

Panama City, FL 32405

VIA CERTIFIED MAIL ONLY

Return Receipt No.: 9214 8901 9403 8354 4643 90

Re: Margo Anderson v. Bay County Sherriff's Office

To Whom It May Concern:

This letter is your notice that our firm represents Margo Anderson with regard to her claims against the City of Lynn Haven and Bay County Sheriff's Office (BCSO) and is intended, pursuant to Chapter 768, Florida Statutes, as formal Notice of Intent to Initiate Litigation against the City for negligence, negligent retention and supervision, selective enforcement false arrest, malicious prosecution, civil conspiracy and for any other civil claim available to Margo Anderson against the City of Lynn Haven and BCSO.

The facts comprising the potential cause of action include but are not limited to the following:

In April of 2015 Mrs. Anderson was elected as Mayor, a position she served until her suspension in August of 2020.

On March 17, 2019, Mrs. Anderson received a phone call from Defendant City of Lynn Haven's Police Chief Ricky Ramie, informing her that City Manager Michael White allegedly brandished a firearm during a domestic altercation with his spouse and subsequently turned the weapon on himself. Ramie further relayed that he had contacted Commissioner Dan Russell to facilitate the removal of White's spouse from the scene. Ramie, acknowledging White's status as his superior within the city hierarchy, expressed uncertainty about his authority to effect an arrest and mentioned the standard protocol of involving the Florida Department of Law Enforcement

(FDLE). Ramie sought guidance from Mrs. Anderson regarding the appropriate course of action, and she instructed him to adhere to established protocol.

Thereafter White would be arrested and taken into custody by Defendant BCSO. This event set off a chain reaction in which the following, including but not limited to, individuals would have to take action to keep their multi-million-dollar scheme hidden.

Following the arrest of White, Deputy City Clerk Vickie Gainer was appointed to the position of Interim City Manager.

In the subsequent two weeks, Mrs. Anderson directed Ramie to secure Michael White's computer due to his crucial role in interfacing with FEMA and maintaining pertinent records. Notably, White had ceased providing updates to her since the conclusion of the declared emergency on October 30, 2018. Additionally, Mrs. Anderson instructed Ramie to change the access codes to the administration building, prompted by concerns expressed by employees who had become apprehensive about White, following the revelation of the gun incident. At some point during this time Ramie revealed a screenshot of a text message between City FEMA Coordinator Amber Guy to White. The text message stated "get together to have some fun. I love you".

On March 26, 2019, Michael White officially resigned as City Manager.

On March 27, 2019, Mrs. Anderson was informed by Phoenix Construction owner James Finch that a new building housing a concession stand and restrooms in the park, had been constructed without a proper bidding process. The contractor responsible, David "Mickey" White, lacked the necessary license for such projects. Notably, Mickey is the owner of Erosion Control Services and the nephew of Derwin White, a co-owner of Gulf Asphalt Company alongside former Florida House of Representatives Speaker Alan Bense.

Mrs. Anderson approached Gainer to obtain a copy of the contractor's information on record. Gainer informed her that there was no bid packet available and provided only one excel sheet as documentation. The construction of the structure amounted to approximately \$200,000. Furthermore, there were six checks issued for substantial amounts totaling around \$5,000,000, but no accompanying invoices or purchase order numbers were provided for these transactions. One of the checks had been cleared by the bank on New Year's Eve.

Mrs. Anderson reconvened with Finch to delve deeper into the matter. During their discussion, Finch contacted Derwin White and requested his presence in the meeting. Shortly thereafter, Derwin arrived, and Finch presented him with the document detailing the financial discrepancies. In response, Derwin reacted with amusement, remarking, "that's a lot of money." However, Finch promptly informed Derwin that there were indications of embezzlement from the City of Lynn Haven, and Mrs. Anderson intended to report these findings to Sheriff Tommy Ford.

Derwin, visibly agitated, expressed his belief that involving law enforcement was unnecessary and that the situation could be resolved without such measures. Finch reiterated the seriousness of the financial irregularities and reaffirmed their decision to report the matter to the Sheriff's office. In response, Derwin cautioned against this course of action, labeling it a "big mistake." Finch, resolute in his stance, asserted that no one would commit theft against Lynn Haven, firmly telling Derwin, "you can go to hell!" Following this exchange, Derwin left the meeting abruptly.

As Derwin was exiting, Finch observed another individual in the vehicle and inquired if she recognized the person. Mrs. Anderson indicated that she did not, prompting Finch to inform her that it was former City Manager Michael White.

Following the meeting Mrs. Anderson resolved to present the uncovered information to Sheriff Tommy Ford. She approached Ramie and informed him of her intentions, requesting his presence as a witness. Ramie agreed to accompany her and assured her that he would arrange the meeting.

During their conversation, Ramie disclosed to her that White had instructed him to collect his personal belongings from the office upon his resignation. Ramie mentioned that White's possessions included a backpack containing thirty thousand dollars.

On April 1, 2019, Mrs. Anderson had a meeting with Sheriff Tommy Ford and Ramie. Upon arriving, Mrs. Anderson entered through the front door and found Ramie already present in Ford's office, having entered through the back entrance. During the meeting, Mrs. Anderson informed Ford about the information she had uncovered. In response, Ford requested Anderson to obtain copies of the checks and all relevant invoices and purchase orders related to Erosion Control Services (ECS) from the city's records. Additionally, Ramie shared the contents of the backpack he had retrieved from Michael White's office with Ford.

On April 2, 2019, Mrs. Anderson requested copies of the documents Ford had requested from Gainer, and they were promptly provided within an hour. To avoid drawing attention while carrying stacks of paperwork, Ramie volunteered to meet her at the Walmart parking lot. Meanwhile, Sheriff Ford then instructed her to retrieve additional paperwork regarding Erosion Control Services from the office of the city's accounting consultant, Jay Moody. Ramie once again offered to assist by taking the documents to Ford.

However, it was later discovered that Ramie did not deliver the documents to Sheriff Ford directly but instead passed them on to Major Jimmy Stanford, a longtime associate of Derwin White. Major Stanford then presented the information to Sheriff Ford, framing Mrs. Anderson as the instigator of corruption. Gainer was presented as the one who had uncovered the scheme.

Thereafter Ford contacted Mrs. Anderson and told her that he was going to call the Federal Bureau of Investigations. He instructed her not to tell anyone about the documents she had provided or that the FBI was coming in.

On April 3, 2019, Sheriff Ford held a meeting with FBI Agent Lawrence Borghini, Major Jimmy Stanford, Lieutenant Jeremy Mathis, and Crime Analyst Lindsey. During this meeting, Sheriff Ford presented documentation to the FBI and identified Interim City Manager Vickie Gainer as the whistleblower, omitting the fact that Mrs. Anderson had originally brought forth the evidence that initiated the investigation. It is crucial to note that no investigation into Erosion Control Services (ECS) and the City of Lynn Haven had commenced until Mrs. Anderson discovered the information and approached Sheriff Ford with the information. This fact is supported by public records.

On April 12, 2019, the Bay County Sheriff's Office (BCSO) executed a search warrant on properties belonging to Erosion Control Services (ECS). During the search, fake property invoices

were planted and photographed in a trashcan by Mickey White, under the direction of Derwin White. These fabricated documents implicated Mrs. Anderson in an alleged scheme to defraud the City by falsely billing for services performed on her private property, which were then charged to the City and subsequently submitted to FEMA for reimbursement.

On November 18, 2019, Mrs. Anderson received a call from Sheriff Ford, who informed her that two FBI agents were waiting in her driveway to speak with her. Mrs. Anderson who was residing in a condominium due to ongoing repairs at her home, provided Ford with the address, and the FBI agents arrived at the location within minutes.

On November 19, 2019, several individuals including Former City Manager Michael White, City Manager David Horton, Community Services Director David Mickey White, ECS owner Josh Anderson, GreenLeaf Lawn Care owner, and Mickey White's sister, Shannon Rodriguez, were arrested. A press conference was conducted with U.S. Attorney Larry Keefe, Assistant Prosecutor Stephen Kunz, Sheriff Tommy Ford, and FBI members, during which an indictment was read. Mrs. Anderson was accused of allegedly having her personal property cleaned of trees and debris, with the costs charged to the City following Hurricane Michael.

Following the press conference, Mrs. Anderson contacted Sheriff Ford to inquire about the situation and urged him to contact the FBI to clarify that she was the initial source of information and was willing to cooperate further. However, Ford declined to engage in a three-way conversation and indicated that he would relay her message to the FBI before abruptly ending the call.

On December 27, 2019, a subpoena was issued for Mrs. Anderson's financial records. Two days later, on December 29, 2019, Major Jimmy Stanford and Lieutenant Jeremy Mathis served the subpoena to her. This subpoena demanded all of her bank statements from her business account under Anderson Productions, LLC, as well as her tax returns, contracts, correspondence, text messages, and emails related to performances dating back to 2015.

Subsequently, on January 7, 2020, these requested documents were presented to the grand jury in Tallahassee for examination.

On August 19, 2020, media personnel gathered at Mrs. Anderson's residence around 6:00 am to film as FBI agents conducted a raid on her home, seizing her husband's motorhome parked in the yard. However, she was not present during the raid, as she was in Jacksonville at the time. She was later taken into custody without media presence. She was charged with 64 counts and faced a potential maximum sentence of 1,029 years in prison and approximately \$50 million in fines. She was released the same day on the condition that she could not contact City Attorney Adam Albritton without the presence of legal counsel.

Additionally, a targeted social media campaign aimed at tarnishing her reputation occurred just forty-eight hours prior to her arrest. The individuals involved in this campaign included family members of influential figures such as Jennifer Dutton Williams, daughter of former City employee Bobby Dutton and spouse of Doug Williams from the 14th Judicial Circuit; Office of State Attorney Larry Basford in Bay County; as well as Patricia Reimer, wife of former police chief Matt Riemer.

After being released, Mrs. Anderson attempted to submit a resignation letter to the City of Lynn Haven to prevent Governor Ron DeSantis from suspending her from office. However, she was unable to do so because she had been locked out of her City email account. Consequently, Governor DeSantis suspended her shortly before she could send the resignation letter through her private email account.

On August 25, 2020, Mrs. Anderson attended her next court hearing. During this hearing, her passport was confiscated, and due to her reported anxiety and PTSD, the prosecution requested that she be prohibited from possessing a gun. The judge allowed her to retain her firearm but imposed restrictions on her ability to travel freely between her two residences. Additionally, the judge made a disparaging remark, suggesting that her music business might flourish under the circumstances.

Subsequently, on August 27, 2020, Mrs. Anderson's attorney informed her that the prosecution had bypassed the judge's decision and notified Secretary of Agriculture Nikki Fried, who then revoked the Plaintiff's concealed carry permit.

Approximately one month later, in a guest editorial, United States Attorney for the Northern District Lawrence Keefe included Mrs. Anderson's name in a list of public officials who had either pleaded guilty or been found guilty, without mentioning her not guilty plea. This editorial was published in various newspapers, including but not limited to the Panama City News Herald, the Tallahassee Democrat, and the Gainesville Sun.

Following Mrs. Anderson's arrest, Sheriff Ford held a press conference where he did not acknowledge that she was the one who initially provided the documents and information that initiated the investigation. Instead, he maintained that the investigation had begun long before Mrs. Anderson's involvement. Additionally, Ford's second in command, Joel Heap, reportedly stated to a local journalist that she was guilty and that she would either accept a plea deal or face a lifetime in prison.

During her investigations, Mrs. Anderson uncovered fraudulent activities carried out by but not limited to David "Mickey" White of ECS and former City Manager Michael White. These findings implicated the following individuals including but not limited to, Derwin White, Allen Bense, and GAC, Major Jimmy Stanford, Sheriff Tommy Ford, DEM Jared Moskowitz, Police Chief Ricky Ramie, Lieutenant Jeremy Mathis, City Engineer Chris Forehand, shedding light on corruption that extended across various governmental entities in the Panhandle region, ranging from the Bay County School Board to the State Capital. Consequently, Mrs. Anderson asserts that she was targeted for removal as a result of these revelations.

Margo Anderson was born on January 9, 1955, in Panama City, Florida and her social security number xxx-xx-6399. To her knowledge, there are no adjudicated fines, penalties, fees or other judgments imposed against or owed by her to the state of Florida or any of its agencies, officers, or subdivisions.

This notice is given under section 768.28, Florida Statutes, and I specifically refer to your obligations thereunder in responding to this correspondence, **and in preserving any evidence**

related to the claims of Margo Anderson including but not limited to emails, video recordings, audio recordings, and all other documentary or physical evidence pertaining to the allegations contained herein. Please advise whether more detail is needed to ensure your prompt investigation of the matter raised in this letter.

Very truly yours,

Marie A. Mattox

Marie A. Mattox

MAM/snj
cc: Margo Anderson