

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA

PAUL A. SLOAN,

Plaintiff,

v.

CASE NO.: 2022 CA \_\_\_\_\_

ERIC ROBINSON,

Defendant.

\_\_\_\_\_/

**COMPLAINT**

COMES NOW, Plaintiff, PAUL SLOAN, by and through his undersigned counsel, and hereby sues Defendant, ERIC ROBINSON, and states as follows:

1. This is an action for defamation, seeking damages in excess of thirty thousand dollars (\$30,000.00).

2. Plaintiff, PAUL SLOAN, is a resident of Sarasota County, Florida.

3. Defendant, ERIC ROBINSON, is a resident of Sarasota County, Florida.

4. Venue in Sarasota County, Florida is proper because the defamation occurred in Sarasota County, Florida, and both parties to this action are residents of Sarasota County, Florida.

5. Plaintiff, PAUL SLOAN, is, or was, a person of good name and reputation who enjoyed the esteem and good opinion of his neighbors and others who know him.

6. Plaintiff, PAUL SLOAN, is the official point of contact (POC) on eighteen (18) U.S. Department of Justice Drug Enforcement Administration

Controlled Substance Licenses. Defendants' social media statements of criminal activity threaten Plaintiff's livelihood.

7. Plaintiff, PAUL SLOAN, is the founder, owner, and administrator of Sarasota County Pain Management Clinic (PMC). The clinic is a Florida State Agency for Health Care Administration (ACHA), a licensed Health Care Clinic (2009 – current), a Florida State Department of Health licensed Pain Management Clinic (2010 – current), and a registered Sarasota County Pain Management Clinic (current). Defendant's social media statements of criminal activity threaten Plaintiff's licenses.

8. Plaintiff, PAUL SLOAN, is a leader in ending the "Pill Mill"/Opioid Epidemic. In Sarasota County, from 2007-2012, he worked with Sheriff Offices Prescription Drug Diversion Detectives, providing information that resulted in the arrest of dozens of drug diversion suspects, many actually being taken out of his clinic in handcuffs. In 2007, Plaintiff hosted a meeting at his clinic for Sheriff Prescription Drug Diversion Detectives from six (6) counties. In 2010, Plaintiff proposed a pain clinic moratorium (with language from Palm Beach) to the county commissioners which they enacted quickly. He requested that county commissioners pass a resolution to be delivered to the Governor, supporting the Prescription Drug Monitoring Program (PDMP) that the Governor was threatening to end. The commissioners passed this resolution in record time. Plaintiff drafted a Pain Clinic Ordinance and submitted this Ordinance to county commissioners. That draft makes up the core of the Sarasota Pain Clinic Ordinance.

9. Plaintiff, PAUL SLOAN's work throughout the State of Florida to end the opioid epidemic is also extensive. In 2009, his clinic became the first pain management clinic to become licensed by the State of Florida Agency for Health Care Administration (AHCA) – the same agency that licenses hospitals in Florida. This license has been held to date. All staff are fingerprinted and FBI/FDLE Background cleared every five (5) years. Plaintiff successfully lobbied to require a photo ID to be shown when obtaining pain medicine from pharmacies. On April 4, 2010, Plaintiff emailed every elected county and city commissioner or council person on the west coast of Florida, urging them to pass a local pain clinic moratorium, and supplied each with the Palm Beach County moratorium language. Within weeks of that email, many municipalities had the first read of their moratorium ordinance. Plaintiff spent nearly two years working with the Board of Medicine and the Board of Osteopathic Medicine Joint Committee on pain clinics developing what are now the Pain Clinic Rules and Regulations. Plaintiff was the only person to attend every meeting during the fourteen (14) months of meetings held. Plaintiff is the founder and president of the Florida Society of Pain Management Providers (501(c6)) formed to lobby the state for reasonable laws to end the pill mill crisis. Plaintiff was successful in getting state statute language to do just that. Plaintiff was also an early proponent for the State Prescription Drug Monitoring Program (PDMP) and the only Pain Management Clinic owner/administrator to be part of the rulemaking process.

10. Plaintiff, PAUL SLOAN, is past president/CEO of the Florida Society of Pain Management Providers.

11. Defendant, ERIC ROBINSON, has published numerous defamatory statements about Plaintiff, PAUL SLOAN, implying he sells illegal drugs, and that he sells drugs to children.

A. On Facebook, on the Dawnyelle Singleton for School Board page, original post from July 14, 2022, comment from Defendant, ERIC ROBINSON, from 13 weeks ago, which states: “Paul Sloan (tagged) Why won’t you disclose where all the money is coming for the Herald Tribune Ads. The fact that a Drug dealer is supporting a candidate tells me everything I need to know.”

B. On Facebook, on the Sarasota County School District – Transparency Project page, original post from July 25, 2022, comment from Defendant, ERIC ROBINSON, from 15 weeks ago, which states: “Paul Sloan makes money destroying peoples lives.”

C. On Facebook, on the Sarasota Herald Tribune page, original post from September 16, 2022, comment from Defendant, ERIC ROBINSON, from 8 weeks ago, which states: “Paul Sloan (tagged) aren’t you the guy who peddled pain killers to little children?”

(See Composite Exhibit 1 to this Complaint)

12. These comments on Facebook are defamation *per se*, and not only accuse Plaintiff, PAUL SLOAN, of committing a crime, but also purport a character inconsistent with his lawful business. As such, the defamatory allegations tend to injure his status and reputation.

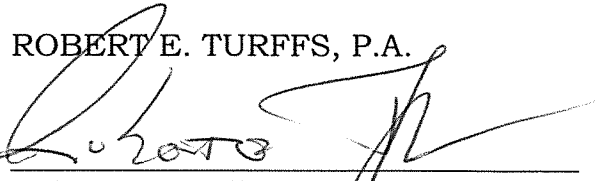
13. As a direct and proximate result of Defendant, ERIC ROBINSON's publications, Plaintiff, PAUL SLOAN, was injured, and his good name and reputation were brought into public scandal and disgrace. Plaintiff, PAUL SLOAN, has suffered turmoil as a direct and proximate result of Defendant, ERIC ROBINSON's publications. Further, these allegations by Defendant are false allegations of conduct, which adversely reflect on Plaintiff's professional business ethics and practices, and are "per se" injurious.

WHEREFORE, Plaintiff, PAUL SLOAN, demands judgment against Defendant, ERIC ROBINSON, for damages, costs, and for such other and further relief as this Court deems just.

**JURY TRIAL DEMAND**

Plaintiff, PAUL SLOAN, hereby demands a trial by jury on all issues so triable.

Dated: 12-7-2022

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