

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

**NANCY HUHTA as the Curator and
Putative Personal Representative
of the Estate of BLAISE GAMBA,**

Plaintiff,

Case No:

v.

WILLIAM GAMBA,

Defendant.

_____ /

COMPLAINT

COMES NOW, the Plaintiff NANCY HUHTA as curator and putative personal representative of the Estate of BLAISE GAMBA, deceased, by the undersigned attorney, sues WILLIAM GAMBA, and alleges as follows:

GENERAL ALLEGATIONS COMMON TO ALL COUNTS

1. This is an action for damages pursuant to Florida's Wrongful Death Act (Florida Statutes §§768.16-768.26) and Florida's Slayer Statute (Florida Statutes §732.802) based upon the murder of BLAISE GAMBA which was committed by WILLIAM GAMBA. The amount in controversy exceeds this Court's jurisdictional limits of \$15,000. Therefore, based on the amount in controversy, this Court has jurisdiction in this matter.

2. At all times material, the deceased, BLAISE GAMBA, was a resident of Pinellas County.

3. At all times material, the Defendant, WILLIAM GAMBA, was a resident of

Pinellas County. After his murder of BLAISE GAMBBA, the Defendant, WILLIAM GAMBBA has relocated to Templeton, California, where he is presently employed as the Chief Nursing Officer at Tenet Twin Cities Community Hospital.

4. At all times material, the deceased, BLAISE GAMBBA and the Defendant, WILLIAM GAMBBA, were married and resided together at their marital home located at 872 Baypoint Drive, Madeira Beach, Pinellas County, Florida 33708. They did not have any children together.

5. The damages in this case arise due to the intentional actions of WILLIAM GAMBBA which were intended to, and which did cause the death of BLAISE GAMBBA. All actions material and relevant to this litigation occurred on land in Pinellas County, Florida; and within the territorial waters of the State of Florida in the Gulf of Mexico at a location within nine nautical miles of the coastline of the State of Florida and Pinellas County in the Gulf of Mexico. Therefore, pursuant to F.S. § 47.011, Florida Statutes, venue is proper in Pinellas County, Florida.

6. On or about October 30, 2018, NANCY HUHTA, who is BLAISE GAMBBA'S mother, was lawfully appointed as the Curator of BLAISE GAMBBA'S Estate. This appointment is intended to be temporary to allow for the filing and prosecution of this lawsuit against WILLIAM GAMBBA due to his own personal conflict of interest and unfitness to serve as personal representative of BLAISE GAMBBA's Estate. In order to hinder the investigation into the circumstances of BLAISE GAMBBA's death and the filing of this lawsuit, WILLIAM GAMBBA objected to the appointment of NANCY HUHTA as the personal representative of BLAISE GAMBBA'S estate. A motion remains pending before Pinellas Circuit Court Judge, Linda Allan in the Probate Division of the Sixth Judicial Circuit of Florida.

7. Plaintiff, NANCY HUHTA, was appointed the Curator of the Estate of BLAISE

GAMBA, deceased, for the purpose of bringing this action. As the Putative Personal Representative of the Estate of BLAISE GAMBA, Nancy Huhta, Curator, expects to be approved and appointed as the Personal Representative of the Estate of BLAISE GAMBA once the Court holds a hearing on Defendant, WILLIAM GAMBA's objections to that appointment. At such time, the Plaintiff will amend her complaint as required by Florida law to bring this action on behalf of the Estate and its lawful beneficiaries. The potential beneficiaries include the Estate, Nancy Huhta independently as parent of the decedent, and the decedent's father independently as parent of the decedent.

COUNT 1
WRONGFUL DEATH

8. On or about November 13, 2016, BLAISE GAMBA died from injuries intentionally inflicted upon her during a suspicious drowning incident that had occurred at a time when the Defendant, WILLIAM GAMBA, was the only other person present and capable of causing her injuries and death. Since that time, multiple law enforcement agencies, including the Federal Bureau of Investigation (FBI) and the Pinellas County Sheriff's Office (PCSO), have initiated criminal investigations into WILLIAM GAMBA's involvement in the death of BLAISE GAMBA. These investigations are currently active and ongoing.

9. As further described herein, the intentional actions of WILLIAM GAMBA, which caused BLAISE GAMBA's fatal injuries, were premeditated and initiated with the intent to cause her physical injury and death. The intentional and malicious actions of WILLIAM GAMBA were motivated not only by his desire to obtain financial gain from life insurance proceeds payable upon the death of his wife as well as proceeds from the sale of her jointly and individually owned assets including the marital home, but also by his extensive and clandestine history of romantic and/or sexual infidelity with other persons during his marriage to BLAISE GAMBA.

10. Throughout his marriage to BLAISE GAMBA, WILLIAM GAMBA had numerous extramarital romantic and/or sexual relationships with multiple persons outside of his marital relationship. These extramarital affairs, relationships, and encounters were concealed by WILLIAM GAMBA from BLAISE GAMBA. While she was alive, BLAISE GAMBA suspected these extramarital activities notwithstanding WILLIAM GAMBA'S attempts to conceal his infidelity from her, and in the months and days leading up to her death, she documented within her diary that she was contemplating confronting WILLIAM GAMBA about his infidelities. After BLAISE GAMBA's murder, the Defendant had also concealed these romantic and sexual affairs from the law enforcement agencies that were investigating his involvement in her suspicious death.

11. During their marriage, BLAISE GAMBA was gainfully employed by the law firm of Carlton Fields in Tampa, Florida, as a lawyer in its commercial litigation department. At the time of her death, BLAISE GAMBA had been a member of the Florida Bar for over 10 years.

12. WILLIAM GAMBA has spent his professional career working in the medical field as a paramedic / EMT and in nursing, and most recently as a nursing / clinical administrator in the hospital setting. As a result of his education, training, and experience as a healthcare provider, he was at all times relevant extremely knowledgeable of the impact of his actions on the forensic medical evidence in his premeditated murder of BLAISE GAMBA.

13. Because of her hard work and achievements as a lawyer employed by a prestigious law firm, BLAISE GAMBA earned significantly more income than did WILLIAM GAMBA as a non-physician healthcare provider. The added income that WILLIAM GAMBA enjoyed by being married to BLAISE GAMBA provided him with a lifestyle that he otherwise would not have been able to afford. This lifestyle included the purchase of a waterfront home in 2013 as well as luxury

automobiles. Thus, WILLIAM GAMBBA could not realistically maintain his luxury lifestyle if he were to simply divorce her as given her higher income level.

14. At the time of her death, BLAISE GAMBBA's life was insured by one or more life insurance policies listing WILLIAM GAMBBA as the primary beneficiary with a total aggregate value exceeding \$1,000,000.00. Thus, her untimely death would allow WILLIAM GAMBBA to maintain the lifestyle that he had become accustomed to because of her significantly higher income while at the same time allowing him to pursue other romantic and/or sexual interests.

15. WILLIAM GAMBBA has an extensive personal history of fraudulently staging accidents, damage, and injuries for the purpose collecting insurance payments.

16. In the late 1990's in the State of New York, WILLIAM GAMBBA staged the theft of his Jeep Grand Cherokee SUV which he was attempting unsuccessfully to sell. To recover and to profit financially, and to avoid a financial loss, WILLIAM GAMBBA falsely reported that this vehicle had been stolen and later staged an accident that caused the total loss of this vehicle. In fact, steps were taken before this staged and fraudulent "theft" and "accident" to ensure that it would result in the total loss of the vehicle including the intentional removal of the vehicle's grill guard. WILLIAM GAMBBA was later paid for the total loss of his vehicle while his fraud went undetected.

17. WILLIAM GAMBBA also took similar steps to recover from his automobile insurer the total value of a Chevy Impala that he later owned. This time, he intentionally caused it to be destroyed by fire in order to recover insurance proceeds. In yet another incident that occurred on Oneida Lake, NY, WILLIAM GAMBBA caused his boat to be destroyed by fire for the purpose of recovering insurance proceeds. As was the case in this case, at the time of the Oneida Lake boat

fire, WILLIAM GAMBA feigned a syncopal episode to avoid questions from law enforcement and investigators.

18. In yet another incident of insurance fraud, WILLIAM GAMBA faked yet another automobile accident and while being treated as a patient at Soldiers and Sailors Memorial Hospital in Penn Yan, NY, he intentionally through himself off of a gurney and falsified injuries for the purpose of making an insurance recovery. He was ultimately successful in recovering a six-figure injury claim against that hospital. Through each incident, WILLIAM GAMBA has escalated the level of fraud perpetrated and the amount of damages falsified and intentionally caused. The events of this case are a natural progression of his insurance fraud portfolio as he has now moved on from simple property damage and self-inflicted personal injury to intentional murder for the purpose of life insurance recovery.

19. On or about November 12, 2016, in Pinellas County, Florida, BLAISE GAMBA accompanied WILLIAM GAMBA on a small private boat that they had rented. Together, they navigated this small vessel to the Gulf of Mexico in the navigable waterways offshore through John's Pass located in Pinellas County, Florida. At all times material, they remained within three (3) leagues and/or within nine (9) nautical miles of the coast of Florida and Pinellas County. At no time did they leave Florida or Pinellas County waters. The stated purpose of the boating excursion was to spend the afternoon snorkeling and scuba diving. No one other than BLAISE GAMBA and the Defendant, WILLIAM GAMBA was present during the events that afternoon that led to the death of BLAISE GAMBA.

20. At the time of her death, BLAISE GAMBA was a physically fit, thirty-seven (37) year old female who had extensive experience in swimming, snorkeling, and diving. She had no pre-existing health conditions that would have led to her death or made her otherwise unfit to go

swimming, snorkeling, or diving on this date in the Gulf of Mexico. At this same time, WILLIAM GAMBBA was a physically fit thirty-seven (37) year old male who was also experienced in swimming, snorkeling, and diving. At all times material WILLIAM GAMBBA had no medical conditions and suffered no injuries that would have caused him to lose consciousness or suffer a seizure on this date.

21. During this boating, diving and snorkeling excursion that took place on or about November 12, 2016, and as they were in the Gulf of Mexico in the navigable waterways approximately five miles offshore from Jonathon's Pass located in Pinellas County, Florida, WILLIAM GAMBBA physically attacked BLAISE GAMBBA and intentionally inflicted injuries to her that ultimately caused her death. As BLAISE GAMBBA was swimming on the surface, WILLIAM GAMBBA intentionally pulled her under water from below and held her head underwater until she became unresponsive and it appeared that she had drowned.

22. After he had caused BLAISE GAMBBA to aspirate enough water to render her unresponsive and unconscious due to drowning, Defendant WILLIAM GAMBBA, then removed her from the water and placed her in the boat.

23. At some point after BLAISE GAMBBA was rendered unconscious by WILLIAM GAMBBA, he encountered another boater who boarded the boat rented and occupied by the GAMBAS. This Good Samaritan boater then operated the boat occupied by the GAMBAS as WILLIAM GAMBBA acted as if he were tending to BLAISE GAMBBA's medical needs. As these events were ongoing, WILLIAM GAMBBA did not exhibit any indication of having suffered injury or physical trauma that would cause him to lose consciousness or suffer from a seizure.

24. Soon thereafter, the GAMBAs and the Good Samaritan boater encountered first responders. After first responders boarded the boat and as they were attempting to revive BLAISE

GAMBA, WILLIAM GAMBA then faked a syncopal episode. This fake syncopal episode was an attempt by WILLIAM GAMBA to remove any suspicion of foul play on his part and to divert attention away from him as a suspect in his wife's murder. This fake medical emergency staged by WILLIAM GAMBA was premeditated and intended to deflect any suspicion that BLAISE GAMBA'S life threatening situation was the result of an intentional attack by him. At this same time, it served the dual purpose of preventing him from being capable of and available to answer questions from first responders.

25. As first responders were attempting unsuccessfully to revive BLAISE GAMBA, and as WILLIAM GAMBA was faking a syncopal episode, they were both being transported to shore. Later, upon arriving on land and as investigators were attempting to question WILLIAM GAMBA, he then pretended to have a seizure. WILLIAM GAMBA claimed that this feigned seizure was the result of a head injury and he demanded to be intubated and transported to the hospital as a patient along with BLAISE GAMBA. Although these steps were not necessary as WILLIAM GAMBA did not have any medical condition that required intubation or even supplemental oxygen, the attending healthcare providers conceded to his demands. Months later, WILLIAM GAMBA asked multiple other persons whether he was seen by law enforcement while he was intubated. This was yet another fake medical emergency staged by WILLIAM GAMBA that was premeditated and intended to deflect any suspicion that BLAISE GAMBA'S life threatening situation was the result of an intentional attack by him, and which was also intended to render himself unavailable to investigators for questioning.

26. In reality WILLIAM GAMBA never suffered a syncopal episode, a head injury, or a seizure. Instead, WILLIAM GAMBA had faked these conditions to divert attention away from himself and to conceal his own guilt in the premeditated murder of BLAISE GAMBA.

27. On November 12, 2016, after being transported to land by first responders, both BLAISE GAMBBA and the Defendant WILLIAM GAMBBA were transported to Palms of Pasadena Hospital in St. Petersburg, Florida. Upon presentation to the emergency department, one physician confirmed that BLAISE GAMBBA's lungs were "full of water" which is contrary to statements later made by WILLIAM GAMBBA that he had administered CPR and that she was breathing at one point after she was brought back into the boat.

28. After a short admission to Palms of Pasadena Hospital, BLAISE GAMBBA was pronounced dead on the morning of November 13, 2016. As BLAISE GAMBBA was in critical condition in the hospital, WILLIAM GAMBBA tried to convince others that he too was in a similarly dire situation. In one instance, and while a patient at Palms of Pasadena Hospital, WILLIAM GAMBBA forcefully ordered law enforcement officers out of his hospital room claiming to be too sick to converse with them while at the same time he was conversing with others in the hospital room. Additionally, WILLIAM GAMBBA was seen by witnesses pretending to either be sleeping or non-responsive with his eyes partially open as he was listening to conversations of family members in his room while he was in the hospital as a patient. Ultimately, as BLAISE GAMBBA was dying, WILLIAM GAMBBA showed no emotion and by witness accounts he seemed more interested in the medical aspects of her condition and whether law enforcement would be investigating his involvement in her death. As his wife was dying, WILLIAM GAMBBA was discharged home from the hospital with no significant injury.

29. Given his medical knowledge, WILLIAM GAMBBA was aware that the circumstances of his wife's death would result in a State conducted autopsy. However, at this same time he was unusually interested in moving forward with her organ donation. Even though her lungs were full of water, they were harvested for donation while at the same time her heart,

which was in pristine condition, was not harvested. Because of his medical knowledge, WILLIAM GAMBBA knew that immediate harvesting of BLAISE GAMBBA's lungs for donation may render her autopsy difficult to use in any criminal prosecution.

30. After BLAISE GAMBBA's death, the Defendant WILLIAM GAMBBA continued to take steps to conceal his murder of his wife and to hinder law enforcement's investigation into her death. On the afternoon of the day that BLAISE GAMBBA died, WILLIAM GAMBBA was asked by law enforcement to assist in the investigation of his wife's death by unlocking both his and BLAISE GAMBBA's Iphone and Ipad and submit them for inspection, and he refused.

31. In the days that followed BLAISE GAMBBA's death, WILLIAM GAMBBA provided multiple conflicting, inconsistent, and irreconcilable versions of the events that occurred which resulted in her death. In one of the Defendant's account of the events that preceded BLAISE GAMBBA's death, WILLIAM GAMBBA claimed that while she was snorkeling and he was scuba diving below her, she appeared to be startled by a large fish and then started struggling. Other accounts of what happened offered by WILLIAM GAMBBA did not involve a large fish, some accounts offered by him involved the Defendant suffering a head injury while others did not, and some versions of his story involved BLAISE GAMBBA suffering a head injury even though her post-mortem examination did not reveal evidence of head trauma.

32. Although each of the stories about what happened offered by Defendant WILLIAM GAMBBA regarding what happened to cause BLAISE GAMBBA to drown involved him scuba diving, post incident investigations revealed that WILLIAM GAMBBA's scuba gear was improperly assembled in a non-functioning manner and that there was no salt on his dive equipment contrary to what would be reasonably expected immediately following the use of such equipment in the Gulf of Mexico. Likewise, WILLIAM GAMBBA's dive computer did not register

any dives on the date that he intentionally caused BLAISE GAMBBA to drown, and his dive belt had substantially more dive weight on it than what would be needed for a dive at that depth that he claimed to have been diving.

33. In the days following BLAISE GAMBBA's death, WILLIAM GAMBBA also denied knowledge to some witnesses of the existence of any life insurance policies listing him as a beneficiary in the event of the death of BLAISE GAMBBA while at the same time he repeatedly contacted insurance companies to pressure them to quickly pay on life insurance policies listing him as a beneficiary.

34. Additionally, the actions of WILLIAM GAMBBA in the days and weeks after the death of his wife were highly inconsistent with those of someone who was mourning the loss of a spouse. Within a few days of BLAISE GAMBBA's death, WILLIAM GAMBBA had ceased to wear his wedding ring, he had sold BLAISE GAMBBA'S automobile, and he had removed every picture of BLAISE GAMBBA from their home. He also directed NANCY HUHTA to remove all of BLAISE GAMBBA's belongings from her closets and dressers. Around that same time, WILLIAM GAMBBA was witnessed to have said "they were able to donate all of her [BLAISE GAMBBA's] organs except her big mouth". Within a week of BLAISE GAMBBA's death, WILLIAM GAMBBA contacted her employer to ask when he would be receiving her bonus, last paycheck, and life insurance proceeds. Around that same time, he also had BLAISE GAMBBA's wedding ring, engagement ring, and necklace, along with his own wedding band, appraised for re-sale. WILLIAM GAMBBA also refused to cooperate with his wife's death investigation.

35. By the end of November 2016, WILLIAM GAMBBA was overheard as he stated that he had obtained cloud access to BLAISE GAMBBA's Iphone and "wiped it clean." In late 2016,

WILLIAM GAMBA also said that he “could not” let law enforcement see his cellphone because he is a “flirty guy” and that they might see some texts “that can be taken wrong.”

36. In early 2017, WILLIAM GAMBA was overheard mentioning that he was expecting law enforcement to “be knocking on his door any day” and he asked other witnesses to confirm whether he was seen at by law enforcement on or about November 12th, 2016, while he was intubated.

37. Not only did Defendant WILLIAM GAMBA take measures to conceal his guilt in the murder of BLAISE GAMABA after she died, but he also took preemptive measures before the murder to prevent law enforcement from discovering the true nature of the events that would lead to her death and his role in causing that anticipated death. On or about October 30, 2016, and while on trip with BLAISE GAMBA to the Florida Keys, Defendant WILLIAM GAMBA insisted that she purchase a full body wet suit that was made of a very thick material. The Defendant, who is a professional healthcare provider, took this proactive step to attempt to conceal any forensic / autopsy evidence proving that a struggle occurred immediately before her death knowing that a thicker full body wet suit would have a better chance of preventing bruising or scratching that may occur during a physical struggle between him and BLAISE GAMBA than would a wet suit that was shorter or not as thick. Indeed, the wet suit that BLAISE GAMBA was wearing at the time of her murder was very thick and had the effect of preventing scratches and bruises from the struggle. However, the added wet suit thickness also had the effect of increasing her buoyancy and made it less likely for her to drown without someone to hold her underwater given her added buoyancy, her state of health as well as her swimming, snorkeling, and diving experience.

38. After her death, Defendant WILLIAM GAMBA took additional steps to prevent and hinder the investigations into BLAISE GAMBA’S death. Specifically, in December 2017 and

January 2018, the Defendant hired criminal defense counsel who then attempted to quash and block the issuance of investigative subpoenas from the State Attorney's Office for the Sixth Judicial Circuit for various medical records for both BLAISE GAMBA and WILLIAM GAMBA.

39. As a direct and proximate result of the wrongful actions of Defendant, WILLIAM GAMBA, BLAISE GAMBA, died on or about November 13th, 2016, and the following damages were sustained:

a. Plaintiff, NANCY HUHTA, as curator and putative personal representative of the Estate of BLAISE GAMBA, deceased, seeks all damages past and future, recoverable by the Estate of BLAISE GAMBA and allowable under Florida's Wrongful Death Act, and pursuant to Florida's Slayer Statute as contained in Florida Statutes §732.802, to specifically include (i) the value of the loss of earnings of the deceased from the date of injury to the date of death, (ii) the value of the loss of the prospective net accumulations of the estate reasonably expected into the future, reduced to present value; (iii) medical and funeral expenses charged against the Estate or paid for by the decedent; and (iv) the contractual benefits due under any and all life insurance policies or other contractual arrangements.

b. Plaintiff, NANCY HUHTA, as curator and putative personal representative of the Estate of BLAISE GAMBA, deceased, for the benefit of NANCY HUHTA, as the mother of BLAISE GAMBA, deceased, and therefore survivor as contemplated by the Florida Wrongful Death Act (§768.21), and pursuant to Florida's Slayer Statute as contained in Florida Statutes §732.802, is seeking all damages past and future, allowable under said Act, to specifically include (i) the mental pain and suffering from the date of the injury and into the future; (ii) the cost of any medical or funeral services paid by the

survivor, and (iii) the contractual benefits due under any and all life insurance policies or other contractual arrangements.

c. Additional beneficiaries will be identified, including BLAISE GAMBAs father, once the Personal Representative is appointed.

COUNT II
APPLICATION OF FLORIDA'S SLAYER STATUTE (F.S. §732.802)

40. The allegations contained within paragraphs 1 - 39, are incorporated herein by reference.

41. Pursuant to Florida's Slayer Statute, F.S. §732.802, "[a] named beneficiary of a bond, life insurance policy, or other contractual arrangement who unlawfully and intentionally kills the principal obligee or the person upon whose life the policy is issued is not entitled to any benefit under the bond, policy, or other contractual arrangement; and it becomes payable as though the killer had predeceased the decedent."

42. In the instant case one or more life insurance policies and/or contracts exist which name the Defendant, WILLIAM GAMBAs as the primary beneficiary in the event of the death of BLAISE GAMBAs.

43. Because WILLIAM GAMBAs murdered BLAISE GAMBAs, he is not entitled to any benefit on any of the life insurance policies and/or contracts which exist listing him as the primary beneficiary in the event of her death. As a result, the monies payable under those policies / contracts must be paid to NANCY HUHTA, as curator and putative personal representative of the Estate of BLAISE GAMBAs, and for the benefit of those who would benefit from such policies and/or contracts if WILLIAM GAMBAs had predeceased her.

44. Florida's Slayer Statute, F.S. §732.802, further states, "[a]ny other acquisition of property or interest by the killer, including a life estate in homestead property, shall be treated in accordance with the principles of this section."

45. In the instant case, after murdering BLAISE GAMBIA, the Defendant, WILLIAM GAMBIA, sold property owned in whole or in part by BLAISE GAMBIA including, but not limited to her automobile, jewelry and her home. BLAISE GAMBIA's home at the time of her death was located at 872 Baypoint Drive, Madeira Beach, Pinellas County, Florida, and it was purchased in 2013 for \$730,000. After BLAISE GAMBIA's death, WILLIAM GAMBIA sold her home in April 2017 for \$1,515,000.

46. Accordingly, because WILLIAM GAMBIA murdered BLAISE GAMBIA, he is not entitled to acquire any property because of her death. Because of the disparity of income between the Defendant and BLAISE GAMBIA throughout their marriage and at the time of her death, most, if not all of the property owned by the decedent or which was jointly owned between the Defendant and Decedent was purchased by monies earned by the Decedent. As a result, because much, if not all of BLAISE GAMBIA'S property has been sold, including her house, NANCY HUHTA, as curator and putative personal representative of the Estate of BLAISE GAMBIA, is entitled to recover all net proceeds obtained from the sale of BLAISE GAMBIA'S property for the benefit of those who would benefit from such policies and/or contracts if WILLIAM GAMBIA had predeceased her. Under Florida's Slayer Statute, WILLIAM GAMBIA is not entitled to retain any of the proceeds from any of the property owned in whole or in part by BLAISE GAMBIA.

47. All proceeds from any life insurance policies or contractual policies listing the Defendant as a beneficiary in the event of BLAISE GAMBIA's death, and all net proceeds recovered by the Defendant from the sale of property wholly and/or jointly owned by BLAISE

GAMBA at the time of her death must be awarded to NANCY HUHTA, as curator and putative personal representative of the Estate of BLAISE GAMBA because the Defendant, as the person who murdered BLAISE GAMBA, is not entitled to retain those proceeds under Florida's Slayer Statute, F.S. §732.802.

DEMAND FOR JUDGMENT AND JURY TRIAL

48. WHEREFORE, Plaintiff, NANCY HUHTA, as curator and putative personal representative of the Estate of BLAISE GAMBA, deceased, demands a trial by jury and judgment against Defendant, WILLIAM GAMBA, for an amount within the jurisdictional limits of this Court, to wit: More than Fifteen Thousand Dollars (\$15,000) plus costs, and for such other relief to which the Plaintiff may be justly entitled.

49. Plaintiff, NANCY HUHTA, as curator and putative personal representative of the Estate of BLAISE GAMBA, deceased, reserves the right to amend this Complaint to seek punitive damages pursuant to Florida law.

DATED this 30th day of October, 2018 in Palm Harbor, Pinellas County, Florida.

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