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IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT, IN AND FOR
DUVAL COUNTY, FLORIDA

JOSHUA LAMBO,

Plaintiff,

Case No:

v.

JACKSONVILLE JAGUARS, LLC,

Defendant.

_____ /

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, JOSHUA LAMBO (“Plaintiff” or “Mr. Lambo”), by and through his undersigned counsel, hereby files this Complaint against Defendant, JACKSONVILLE JAGUARS, LLC (“Defendant”), and as grounds therefore alleges as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter. This is an action for damages exceeding \$30,000.00 exclusive of interest, costs, and attorney’s fees.
2. Venue is proper in this Court because the events giving rise to Plaintiff’s Claim occurred in Duval County, Florida.
3. Plaintiff is JOSHUA LAMBO, and has been at all times relevant to this suit, a resident of Duval County, Florida.
4. Defendant is JACKSONVILLE JAGUARS, LLC, and has been at all times relevant to this suit, a for-profit company doing business in Duval County, Florida, with its principal place of business at 1 TIAA BANK FIELD DRIVE, JACKSONVILLE, FL 32202.

FACTS

5. At all times relevant to this Complaint, Plaintiff was an employee of Defendant, JACKSONVILLE JAGUARS, LLC. Plaintiff's employment was as placekicker for the Jacksonville Jaguars.

6. At all times relevant to this Complaint, Urban Meyer ("Meyer") was the Head Coach of the Jacksonville Jaguars.

7. As Head Coach, Mr. Meyer supervised the players, including Mr. Lambo.

8. Mr. Meyer was the ultimate decision-maker regarding Mr. Lambo's employment as placekicker.

9. Mr. Meyer was directly involved in Plaintiff's day-to-day coaching, practice and playing as an active roster team member.

10. In late August 2021, Mr. Lambo was practicing for a pre-season game against the Dallas Cowboys at the Jacksonville Jaguars practice facilities. Mr. Lambo was in a lunge position when Mr. Meyer approached him, kicked him in the leg, and used profanity to insult Mr. Lambo and warn him to make his kicks. Specifically, Mr. Meyer screamed at Mr. Lambo, "Hey dipshit, make your fucking kicks!"

11. Mr. Lambo immediately objected to Mr. Meyer's physical battery by telling Mr. Meyer that his behavior was out of line, and he was never to strike him again.

12. Specifically, Mr. Lambo said, "Don't you ever fucking kick me again!" Mr. Meyer responded, "I'm the head ball coach, I'll kick you whenever the fuck I want."

13. An employer physically striking an employee at work in furtherance of the employer's interests, and then threatening to do so again in response to resistance, is a crime under Florida law. *See Florida Statute Sections 784.011(1) and (2), and 784.03(1)(a)(1).*

14. In addition to directly voicing his objections to this employer's activity to Mr. Meyer, Mr. Lambo immediately verbally reported the illegal activity to Defendant through his agent, Richard Irvin.¹

15. Defendant did not initiate an investigation into Mr. Lambo's allegation of Mr. Meyer's conduct.

16. Defendant did not inform the NFL or the NFL Player's Association of the allegations made by Mr. Lambo.

17. Defendant did not intervene in the close working conditions between Mr. Meyer and Mr. Lambo.

18. Defendant allowed Mr. Meyer to actively manage Mr. Lambo and control material terms of his employment.

19. Mr. Meyer was furious with Mr. Lambo for objecting to Mr. Meyer's unlawful conduct. In retaliation for his report, Mr. Meyer initiated a pattern of harassment, and created a hostile work environment for Mr. Lambo.

20. Within a day of Mr. Lambo's complaint, Mr. Meyer approached Mr. Lambo, threatening to cut him from the team if he ever objected to his behavior or challenged his authority again.

21. Mr. Meyer stated to Mr. Lambo, "[I]f you ever speak to me like that again, you'll be out of here. You're the first player I've ever let speak to me that way in my career, and if you do it again, you're gone."

22. Mr. Meyer proceeded to verbally harass Mr. Lambo regularly and use intimidation tactics to distract Mr. Lambo while he practiced kicks.

¹ This is not in dispute. In December 2021, Defendant released the following statement to the media regarding the incident: "Jaguars legal counsel indeed acknowledged and responded immediately to the query made by Josh Lambo's agent Friday, August 27, 2021."

23. Mr. Lambo felt the stress of Mr. Meyer's retaliatory actions, which affected Mr. Lambo's ability to sleep, practice, and perform his job as he had in previous seasons under different coaches.

24. Mr. Meyer's hostility had the intended effect on Mr. Lambo, resulting in Mr. Lambo uncharacteristically missing kicks from the ranges of fifty-five yards, fifty-two yards, and forty-eight yards.

25. Mr. Lambo's missed kicks did not cause any losses for the Jaguars.

26. On October 19, 2021, Mr. Meyer and Defendant fired Mr. Lambo.

27. As a result, Mr. Lambo has suffered professional ramifications including lost wages, benefits and other remuneration, as well as extreme emotional and mental distress because of the harassment, hostile work environment, and retaliation by Defendant.

28. Subsequent to Mr. Lambo's termination, media reports began to surface reporting on other instances of Mr. Meyer harassing or bullying employees, and the hostile work environment which existed under Mr. Meyer.

29. The Jaguars won only two games in 2021. Multiple skilled players missed assignments, dropped passes, or otherwise failed to perform on-field, directly resulting in Jaguars game losses.

30. However, Mr. Lambo – the player who objected to and reported the unlawful activity by Mr. Meyer – was the only player Mr. Meyer and Defendant fired from the roster.

31. On or about December 15, 2021, the Tampa Bay Times published an article reporting on the incident wherein Mr. Meyer kicked Mr. Lambo and subsequently harassed and fired him.

32. Defendant owner Shad Khan announced the following day that Defendant fired Mr. Meyer as Head Coach, presumably as the result of Mr. Meyers inability to maintain the “trust and respect” of Defendant. Mr. Khan issued a written statement stating, in part, “I informed Urban of the change this evening. As I stated in October, regaining our trust and respect was essential. Regrettably, it did not happen...”

VIOLATION OF THE FLORIDA PRIVATE SECTOR WHISTLE-BLOWER’S ACT,
FLORIDA STATUTES SECTIONS 448.101 *et. seq.*

33. Plaintiff realleges and incorporates by reference all allegations set forth in each of the preceding paragraphs as though fully set forth herein.

34. The Florida Private Sector Whistle-blower’s Act (“FWBA”) prohibits an employer from taking retaliatory personnel action against an employee who has objected to, or refused to participate in, any activity, policy, or practice of the employer which is in violation of a law, rule, or regulation. *See Florida Statute Section 448.102(3).*

35. Plaintiff reasonably and correctly believed that Defendant and Mr. Meyer’s actions violated Florida civil, criminal, and employment law concerning assault, battery, and workplace violence in furtherance of an employer’s interests.

36. Plaintiff engaged in protected activity under the Florida Private Sector Whistle-blower’s Act (“FWBA”) by objecting to, and refusing to participate in, the illegal actions of Defendant. Plaintiff communicated these objections to both Mr. Meyer and Defendant.

37. Defendant and Mr. Meyer knew Plaintiff engaged in protected activity.

38. Defendant and Mr. Meyer immediately subjected Plaintiff to a pattern of retaliatory harassment and a hostile work environment following the protected activity.

39. The protected activity was the motivating factor behind this harassment and retaliation.

40. Defendant and Mr. Meyer fired Plaintiff from the team shortly after he engaged in protected activity.

41. Plaintiff's engagement in protected activity was the motivating factor behind Mr. Meyer and Defendant's decision to terminate Plaintiff's employment.

WHEREFORE, Plaintiff respectfully demands judgment against Defendant for back pay otherwise owed to the Plaintiff with interest, compensation for any special damages sustained as a result of the discrimination, including, but not limited to, emotional distress and reputational harm, litigation costs, expert witness fees, reinstatement or front pay in lieu of reinstatement, reinstatement of benefits, reasonable attorney's fees, and any other relief the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial by jury on all issues so triable as of right by jury in this matter.

Respectfully submitted this 10th day of May, 2022.



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