

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA  
CIVIL DIVISION

CASE NO.: 2026-\_\_\_\_ CA (01)

NATASHA ERVIN,

Plaintiff,

v.

DARVIN WILLIAMS,

Defendant.

\_\_\_\_\_ /

**COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiff, NATASHA ERVIN (“Plaintiff” or “ERVIN”), files this Complaint and sues Defendant, DARVIN WILLIAMS (“Defendant” or “WILLIAMS”), for One Million Dollars in damages and alleges as follows:

**INTRODUCTION**

1. This is an action for damages exceeding \$1,000,000, exclusive of interest, costs, and attorney’s fees, arising from Defendant’s defamatory statements falsely accusing Plaintiff of criminal conduct, including embezzlement, in order to cover up for own improper conduct that resulted in his termination of employment.
2. Plaintiff, NATASHA ERVIN, is a resident of Miami-Dade County, Florida, and is otherwise sui juris.
3. Defendant, DARVIN WILLIAMS, is a resident of Miami-Dade County, Florida, and is otherwise sui juris.
4. Venue is proper in Miami-Dade County because the defamatory statements were published, circulated, and communicated within Miami-Dade County, Florida, including Opa-locka, Florida.
5. Defendant Darvin Williams is the former City Manager of the City of Opa Locka.
6. Plaintiff Natasha Ervin is a current City Commissioner and former Vice Mayor of the City of Opa Locka.
7. During his tenure as City Manager Darvin Williams committed misconduct when he opened up multiple bank accounts without City Commission approval, resulting in then Vice Mayor Ervin sponsoring a Resolution that he never work in the City again.

8. He also discharged and demoted employees without the required due process and initiated retaliatory investigations.
9. When then Vice Mayor Williams attempted to hold Williams accountable for his improper conduct, he retaliated by making up false and defamatory allegations against her.
10. Among other things, Williams verbally and in written statements and knowing the statements were false, accused Vice Mayor Irvin of embezzlement and other crimes.
11. Williams knew these accusations were not true and made them up with pure malice in an effort to destroy her reputation in the community and in her business because he wanted to cover up his own improper conduct and retaliate against elected officials who held him accountable.
12. The Plaintiff has established a reputation for honesty, integrity, and professionalism within her community and profession.
13. Plaintiff has for years been known as an activist who spends her free time helping those in need.
14. Plaintiff has never committed any wrongdoing and has spent her life serving the public.
15. To serve his own interests, the Defendant publicly and falsely accused Plaintiff of “embezzlement” and accused Plaintiff of stealing and/or misappropriating money.
16. Upon information and belief, Defendant made statements including but not limited to:
  - a. “NATASHA ERVIN embezzled money.”
  - b. “NATASHA ERVIN stole funds.”
  - c. “NATASHA ERVIN committed embezzlement in Opa-locka.”
17. The statements made by Defendant were false.
18. Defendant knew the statements were false when they were made or acted with reckless disregard as to their truth or falsity.
19. The statements were presented as factual assertions, not opinions.
20. Defendant published the statements to third parties through verbal statements, social media posts, online publications, and/or other public communications.
21. Williams made these statements to the media, City staff and in writing in the summer of 2024.
22. Defendant’s statements directly accused Plaintiff of criminal conduct, dishonesty, fraud, and moral turpitude.

23. Defendant's conduct was malicious and intended to injure Plaintiff's reputation, standing in the community, and professional opportunities.
24. As a direct and proximate result of Defendant's false statements, Plaintiff has suffered damages, including but not limited to:
  - a. Harm to reputation;
  - b. Public humiliation;
  - c. Emotional distress and mental anguish;
  - d. Loss of personal and professional opportunities; and
  - e. Other damages to be proven at trial.

### **COUNT I – DEFAMATION**

25. Plaintiff realleges and incorporates paragraphs 1 through 24 as if fully set forth herein.
26. Defendant published false and defamatory statements concerning Plaintiff to third parties.
27. The statements falsely accused Plaintiff of criminal activity, including embezzlement and theft.
28. The statements were false and defamatory per se because they accused Plaintiff of committing a crime.
29. Defendant either knew the statements were false or acted with reckless disregard for the truth.
30. Defendant acted with malice and intent to harm Plaintiff.
31. As a direct and proximate result of Defendant's defamatory statements, Plaintiff suffered injury to her reputation, emotional distress, embarrassment, humiliation, and other damages.

**WHEREFORE**, Plaintiff, NATASHA ERVIN, respectfully requests that this Court enter judgment in her favor and against Defendant, DARVIN WILLIAMS, and award:

- A. Compensatory damages;
- B. General damages;
- C. Punitive damages;
- D. Costs of this action;
- E. Pre-judgment and post-judgment interest; and
- F. Such other relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff demands trial by jury on all issues so triable as a matter of right.

DATED: May, 20th, 2026

Respectfully submitted,

**MICHAEL A. PIZZI, JR., P.A.**

*Attorney for Natasha Ervin*

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By: \_\_\_\_\_

**Michael A. Pizzi, Jr.**