

RETURN DATE:

DOCKET NO:

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SUPERIOR COURT

RALPH S. GIORGIO,

Plaintiff,

JUDICIAL DISTRICT OF
STAMFORD/NORWALK

v.

:

AT STAMFORD

PAUL SCHWARTZ, LAWRENCE GRAEV,
JOHN MILAN, REED SALVATORE,
STEN WILSON, ART LINARES,
SANJAY KAMLANI, FEDERAL TAX AUTHORITY, LLC
AND DOES 1-100, inclusive

:

Defendants

July 13, 2022

COMPLAINT

Plaintiff, Ralph S. Giorgio ("Mr. Giorgio") as and for his Complaint against Defendants, Paul Schwartz ("Schwartz"), Lawrence Graev ("Graev"), John Milan ("Milan"), Reed Salvatore ("Salvatore"), Sten Wilson ("Wilson"), Art Linares ("Linares"), Sanjay Kamalani ("Kamlani"), and Federal Tax Authority LLC ("Tax") and DOES 1-100 alleges as follows:

I. GENERAL ALLEGATIONS

1. Mr. Giorgio is and at all times pertinent herein was a resident in the County of Fairfield, State of Connecticut.
2. Tax is and at all times pertinent herein was an LLC formed and existing under the laws of the State of Washington with its principal place of business at 162 East Ave., 3rd Floor, Norwalk, CT 06581, County of Fairfield.
3. Schwartz is and at all times pertinent herein was a member of the Board Managers/Directors for Tax.

4. Graev is and at all times pertinent herein was a member of the Board of Managers/Directors for Tax.

5. Milan is and at all times pertinent herein was and has been a member of the Board of Managers/Directors for Tax and its CEO

6. Salvatore is and at all times pertinent herein was and has been a member of the Board of Managers/Directors for Tax.

7. Wilson is and at all times pertinent herein was and has been a member of the Board of Managers/Directors for Tax.

8. Linares is and at all times pertinent herein was and has been a member of the Board of Managers/Directors for Tax.

9. Kamlani is and at all times pertinent was and has been a member of the Board of Managers/Directors for Tax.

10. This action seeks to redress injuries sustained by Mr. Giorgio when Defendants and each of them on or about July 14, 2020 (and subsequent thereto) collaborated, wrote, offered, conspired, ratified, agreed upon, authorized and directed the publication of an email to numerous third persons and entities and thereafter, verbally represented to numerous third persons and entities the blatantly false statement that Mr. Giorgio was a “confessed felon.”

11. Plaintiff has no knowledge of the true names and capacities of the Defendants sued herein as Doe 1 through 100, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when plaintiff ascertains the same. Plaintiff is informed and believes that each of the fictitiously-named Defendants have caused or contributed to the damage set forth in this complaint.

12. Plaintiff is informed and believes, and thereon alleges, that at all times mentioned herein, the Defendants concurred in or contributed to the various intentional acts and statements of each of the other Defendants and proximately caused the complaints, injuries and damages sustained herein by Mr. Giorgio.

13. Plaintiff is informed and believes, and thereon alleges, that at all times mentioned herein, the Defendants were members of an engaged in a joint venture, partnership, conspiracy and common enterprise, and were acting within the course of and pursuant to said joint venture, partnership, conspiracy and common enterprise.

14. Plaintiff is informed and believes, and thereon alleges, that at all times mentioned herein the Defendants herein mentioned, and each of them were and have been agents, servants, members, managers, officers, directors, employers, and/or employees of each and one another and, as such, were acting in the course and scope of their respective agency, joint venture, relationship, and conspiracy with each other.

II. FACTUAL ALLEGATIONS – – DEFAMATION

15. Plaintiff incorporates herein by reference as though fully set forth Paragraphs 1-14 above.

16. Plaintiff is informed and believes and thereon alleges that on July 14, 2020 (and on dates subsequent thereto) all of the Defendants and each of them collaborated, wrote, authored, drafted, conspired, ratified, agreed upon, authorized, requested and directed that Paul Schwartz publish and transmit to third parties by way of email (attached as Exhibit A to this complaint) the blatantly false statement of fact that “Ralph Giorgio [was] a confessed felon.”

17. Defendants intentionally, willfully, and maliciously made and published the hereinabove mentioned false statement that “Ralph Giorgio [was] a confessed felon” with the specific purpose, spirit, design, and intent to sabotage and injure Mr. Giorgio’s reputation, esteem, integrity, good name, and goodwill, and to injure Mr. Giorgio’s existing and future personal, business, and financial relationships (that Mr. Giorgio had worked so hard for more than 40 years to create and develop, and in further, intentionally intended to and did inflict serious and grievous emotional distress on Mr. Giorgio all of which have and continue to cause irreparable harm to Mr. Giorgio’s good name and reputation in the community in the business, securities, and Wall Street community, specifically, and in his other personal relationships.

18. The written statement made and published by Defendants and each of them in ¶ 16 above was: (a) false, (b) was made with the knowledge that it was false, (c) the statement was made with reckless disregard as to its falsity and inaccuracy, (d) was intentionally made to falsely accuse Mr. Giorgio of dishonesty, of criminal wrongdoing, and of being not only a criminal, but a “confessed felon.”

19. The statement made by Defendants and each of them in ¶ 16 above was intended by the Defendants and each of them to inflict harm and damage on Mr. Giorgio and did inflict harm and damage on Mr. Giorgio.

20. Plaintiff is informed and believed and thereon alleges that on numerous occasions after July 14, 2020, not only did Defendants and each of them republish to additional third persons and entities their written statement that Mr. Giorgio [was] a “confessed felon” but also on numerous occasions represented verbally to third persons and entities the following blatantly false statements of, concerning, and regarding Mr. Giorgio:

i. That CEO (David Campbell) might as well hire/associate with Bernie Madoff instead of Ralph Giorgio;

ii: That according to Connecticut statute judicial records (Mr. Giorgio) had pled guilty to crimes involving security violations, fraud and an "Ponzi scheme";

iii. That Mr. Giorgio had been sanctioned by the SEC;

iv. "He's a crook."

v. "He's a con artist"

vi. "The SEC has removed his right to trade"

21. The statements made by Defendants and each of them in ¶ 19 above were: (a) false, (b) were made knowing that they were false, (c) the statements were made with reckless disregard as to their falsity and inaccuracy, (d) or intentionally made to falsely accuse Mr. Giorgio of dishonesty, of criminal wrongdoing, and of being a criminal.

22. As a result of Defendants' false statements of fact, Mr. Giorgio has incurred a substantial loss to his character and reputation, self-esteem, integrity, has been subject to ridicule and scorn by reason of Defendants' intentional false, willful and malicious statements, and severe emotional distress, loss of past, existing and future personal, financial/business opportunities, relationships, and earning capacity.

III. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

23. Plaintiff incorporates herein by reference as though fully set forth all of his allegations in paragraphs 1-22 above.

22. Defendants and each of them made outrageous false statements about Mr. Giorgio as enumerated in Paragraphs 16 and 19 above. As a result of these extreme, false and outrageous statements, Mr. Campbell has and continues to suffer severe emotional distress, anxiety, and depression. Defendants willful, malicious, intentional statements created a high degree of risk of harm, yet defendants and each of them proceeded to act with malice and/or reckless and conscious disregard or indifference to the risk their actions and statements created for Mr. Giorgio.

WHEREFORE, Plaintiff Ralph S. Giorgio prays for judgment against Defendants and each of them to be considered separately and individually for the purpose of determining the sum of money that will fairly and reasonably compensate Mr. Giorgio as follows:

a. Loss of reputation, self-esteem and character plaintiff has suffered in the past and will continue to suffer in the future; and

b. General damages including but not limited to emotional distress, mental anguish, anxiety and depression that plaintiff has suffered in the past and will continue to suffer in the future; and

c. Loss of past, existing, and future personal, financial/business opportunities, relationships, income, and earning capacity; and

d. Injunctive relief enjoining Defendants and each of them from further publishing the false, defamatory statements of or concerning plaintiff as enumerated herein; and

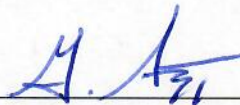
e. Punitive Damages; and

f. Such other and further relief that this Court deems just and proper.

THE PLAINTIFF

RALPH S. GIORGIO

By



Gregory D. Abt

ABT & ASSOCIATES LLC

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Mission Viejo, CA 92691

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JURIS NO.: 300205

EXHIBIT A

EXHIBIT A

----- Forwarded message -----

From: **Paul H Schwartz, DVM** <hvsevc@gmail.com>

Date: Tue, Jul 14, 2020 at 5:44 PM

Subject: Fwd: The Federal Tax Authority Statement

To: <Rdavidlcampbell@gmail.com>, Reed Salvatore <reed@accuratelockandhardware.com>, John Milan <milan@fedtax.net>, Art Linares, Sr. <uisartlinares@gmail.com>, Lawrence Graev <lgg@thegrg.com>, Sten Wilson <stenrw@finnsheep.net>

David

Please take note of the attached.

Your behavior has only compounded the situation and resulted in the reduction of my ability to attenuate this bill.

It's time to resolve this and either sell the company or onboard a strategic investor. The advice you are receiving from Ralph Giorgio (a confessed felon) and his lawyer Mr Abt will only result in the failure of the company and you. Please do not foolishly believe that the BOM's and the shareholders will stand by as you attempt to circumvent their interests.

Respectfully.

VERIFICATION

STATE OF CONNECTICUT

Greenwich, Connecticut

COUNTY OF FAIRFIELD

I, Ralph S Giorgio, being over the age of 18 and having personal knowledge of the facts herein stated in this instant complaint, do hereby swear under penalty of perjury and affirm that the same to be true and as to those matters stated on information and belief, I understand them to be true.

Dated: July 13, 2022

RALPH S. GIORGIO

Ralph S Giorgio

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STATEMENT OF AMOUNT IN CONTROVERSY

Plaintiff, Ralph S. Giorgio states that the amount in controversy exceeds One Hundred Thousand Dollars (\$100,000), exclusive of punitive damage attorney's fees, interest and costs.

THE PLAINTIFF

RALPH S. GIORGIO

By  _____

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