

JORGE L. FORS, JR.,
Plaintiff,

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT COURT IN AND
FOR MIAMI-DADE COUNTY, FLORIDA

v.

CIRCUIT CIVIL DIVISION

KEVIN MARINO CABRERA; DADE
FIRST, PC; SAVE OUR QUALITY OF
LIFE PC; ANTHONY PEDICINI;
THOMAS PICCOLO; DAVID
MILLNER; SIMWINS, LLC; CITIZENS
ALLIANCE FOR FLORIDA'S
ECONOMY, PC; ALEJANDRO
MIRANDA, MIRANDA ADVOCACY,
LLC, JOHN DOE #1, JOHN DOE #2,
JOHN DOE #3, JOHN DOE #4, and JANE
DOE,

CASE NO.: _____

JURY TRIAL DEMANDED

Defendants.

/

COMPLAINT

1. Plaintiff, JORGE L. FORS, JR., sues Defendants, KEVIN MARINO CABRERA; DADE FIRST, PC; SAVE OUR QUALITY OF LIFE, PC; ANTHONY PEDICINI; THOMAS PICCOLO; DAVID MILLNER; SIMWINS, LLC; SAVE OUR QUALITY OF LIFE, PC; CITIZENS ALLIANCE FOR FLORIDA'S ECONOMY, PC; ALEJANDRO MIRANDA; MIRANDA ADVOCACY, LLC; JOHN DOE #1, JOHN DOE #2, JOHN DOE #3, JOHN DOE #4, and JANE DOE, and states as follows.

INTRODUCTION

2. This action arises from the publication and dissemination of multiple, written defamatory statements and implications in the form of political mailings, text messages, and internet website publications.

3. This action also arises from a civil conspiracy by the Defendants in furtherance of a plan to defame JORGE L. FORS, JR. (hereinafter “FORS”).

4. Defendants are disseminating disinformation in Miami-Dade County.

5. Defendants aim to influence the outcome of the 2022 election for Miami-Dade County Commission improperly and unlawfully.

6. FORS is a candidate for Miami-Dade County Commissioner, District 6, who has received the endorsement of the outgoing, incumbent commissioner, numerous local elected officials and leaders, and the local police and fire organizations who represent first responders.

7. During the period between May 2022 and September 2022, Defendants funded, organized, coordinated, created, disseminated, and published numerous mailings and text messages (collectively, the “Defamatory Hit Pieces”) to thousands of readily identifiable Miami-Dade County voters.

8. Each Defamatory Hit Piece contained false, defamatory statements about Fors.

9. Some Defamatory Hit Pieces claimed FORS has a criminal past.

10. Some Defamatory Hit Pieces display realistic, but doctored, images depicting FORS as having been incarcerated.

11. Some Defamatory Hit Pieces claim Fors supported, protected, and otherwise facilitated human trafficking and human traffickers.

12. Every Defamatory Hit Piece misled voters.

13. Every Defamatory Hit Piece damaged FORS personally, professionally, and politically.

14. True and correct copies of the Defamatory Hit Pieces are attached hereto as **Composite Exhibit A.**

15. Defendants also funded, organized, coordinated, created, disseminated, and published a website containing the same false and defamatory information for the same malicious purposes (the “Defamatory Website”).

THE PARTIES

16. This is an action for damages that exceed the jurisdictional limit of the Eleventh Judicial Circuit Court in and for Miami-Dade County, Florida, exclusive of interest, attorney’s fees, and costs.

17. Plaintiff, FORS, is a lifelong resident of Miami-Dade County, Florida and is otherwise *sui juris*.

18. FORS is currently an elected Commissioner for the City of Coral Gables.

19. Fors has been a licensed member of the Florida Bar in good standing since 2011.

20. FORS qualified with the Miami-Dade Supervisor of Elections as a candidate for Miami-Dade County Commissioner, District 6.

21. Defendant, KEVIN MARINO CABRERA (“CABRERA”), is a resident of Miami-Dade County, Florida and is otherwise *sui juris*.

22. CABRERA is a lobbyist and political operative.

23. CABRERA has been registered to lobby the Miami-Dade County government on behalf of numerous clients.

24. Now, CABRERA is also a candidate for Miami-Dade County Commissioner, District 6.

25. Defendant, DADE FIRST, PC (“DADE FIRST”), is a Florida political committee.

26. DADE FIRST is organized and controlled by CABRERA to support his political campaign.

27. Defendant, SAVE OUR QUALITY OF LIFE, PC (“SAVE OUR QUALITY OF LIFE”), is a Florida political committee located in Tampa, Florida.

28. SAVE OUR QUALITY OF LIFE was created and is employed to disseminate false and defamatory political messages, media, and communications.

29. SAVE OUR QUALITY OF LIFE does not disclose its true organizers in its filings.

30. SAVE OUR QUALITY OF LIFE does not disclose its true organizers on its communications.

31. SAVE OUR QUALITY OF LIFE engages in sordid tactics with impunity due to the lack of disclosure.

32. SAVE OUR QUALITY OF LIFE lists 1509 East 9th Avenue, Tampa, Florida 33605 as its principal address.

33. Defendant, ANTHONY PEDICINI (“PEDICINI”), is a resident of Florida and is otherwise *sui juris*.

34. PEDICINI is a political consultant who specializes in false and defamatory political attack mailers and has been sued numerous times for that reason.

35. Defendant, THOMAS PICCOLO (“PICCOLO”), is a resident of Florida and is otherwise *sui juris*.

36. PICCOLO is a political consultant who works in concert with PEDICINI.

37. Defendant, DAVID MILLNER (“MILLNER”), is a resident of Florida and is otherwise *sui juris*.

38. MILLNER is a political consultant who works in concert with PEDICINI and PICCOLO.

39. Defendant, SIMWINS, LLC ("SIMWINS"), is a Tampa-based, Florida Limited Liability Company.

40. SIMWINS is known to employ defamatory communications and disinformation to influence the outcomes of political elections.

41. SIMWINS is operated and controlled by PEDICINI, PICCOLO, and MILLNER.

42. SIMWINS principal place of business is listed as 1509 East 9th Avenue, Tampa, Florida 33605.

43. SIMWINS uses the same address listed by SAVE OUR QUALITY OF LIFE.

44. Defendant, CITIZENS ALLIANCE FOR FLORIDA'S ECONOMY, PC ("CITIZENS ALLIANCE") is a Florida political committee with a P.O. box mailing address located in Stuart, Florida.

45. CITIZENS ALLIANCE was created and is employed to assist and facilitate the dissemination of false and defamatory political messages, media, and communications, in a manner designed to conceal the actors behind the sordid attacks.

46. PEDICINI is CITIZENS ALLIANCE's chairperson and registered agent

47. Although CITIZENS ALLIANCE's mailing address is a P.O. Box mailing address located in Stuart, Florida, the registered agent address for the political committee is 1509 East 9th Avenue, Tampa, Florida 33605.

48. This Ybor City location is the same address consistently listed for SIMWINS and SAVE OUR QUALITY OF LIFE.

49. ALEJANDRO MIRANDA ("MIRANDA") is a known political operative.

50. MIRANDA operates MIRANDA ADVOCACY ("ADVOCACY") as his alter ego.

51. MIRANDA and ADVOCACY both operated from Miami Beach, Florida, and are

within the jurisdiction of the Court.

52. Defendant, JOHN DOE #1, has engaged in overt acts to further a plan to defame FORS and influence the outcome of the election for Miami-Dade County Commission through the dissemination of defamatory statements and disinformation.

53. Upon information and belief, JOHN DOE #1 is significantly involved in Florida politics as either a lobbyist, donor, consultant, or official.

54. However, JOHN DOE #1 is named pseudonymously in an abundance of caution to protect the innocent while Plaintiff ascertains all the persons involved and their respective roles.¹

55. Defendant, JOHN DOE #2, has engaged in overt acts to further a plan to defame FORS and influence the outcome of the election for Miami-Dade County Commission through the dissemination of defamatory statements and disinformation.

56. Upon information and belief, JOHN DOE #2 is significantly involved in Florida politics as either a lobbyist, donor, consultant, or official.

57. However, JOHN DOE #2 is named pseudonymously in an abundance of caution and to protect the innocent while Plaintiff ascertains all the persons involved and their respective roles.

58. Defendant, JOHN DOE #3, has engaged in overt acts to further a plan to defame FORS and influence the outcome of the election for Miami-Dade County Commission through the dissemination of defamatory statements and disinformation.

59. Upon information and belief, JOHN DOE #3 is significantly involved in Florida politics as either a lobbyist, donor, consultant, or official.

¹ Although the precise role played by each Defendant has not been fully determined, these facts will be discovered and revealed through the discovery process including written party discovery, depositions, and non-party subpoenas and depositions. Furthermore, it is anticipated that such discovery may reveal the participation of additional conspirators not yet identified at this time.

60. However, JOHN DOE #3 is named pseudonymously in an abundance of caution and to protect the innocent while Plaintiff ascertains all the persons involved and their respective roles.

61. Defendant, JOHN DOE #4, has engaged in overt acts to further a plan to defame FORS and influence the outcome of the election for Miami-Dade County Commission through the dissemination of defamatory statements and disinformation.

62. Upon information and belief, JOHN DOE #4 is significantly involved in Florida politics as either a lobbyist, donor, consultant, or official.

63. However, JOHN DOE #4 is named pseudonymously in an abundance of caution and to protect the innocent while Plaintiff ascertains all the persons involved and their respective roles.

64. Defendant, JANE DOE, has engaged in overt acts to further a plan to defame FORS and influence the outcome of the election for Miami-Dade County Commission through the dissemination of defamatory statements and disinformation.

65. Upon information and belief, JANE DOE is significantly involved in Florida politics.

66. However, JANE DOE is named pseudonymously in an abundance of caution and to protect the innocent while Plaintiff ascertains all the persons involved and their respective roles.

67. As used in this Verified Complaint, Defendants refers to each Defendant named above, unless the context clearly requires otherwise.

68. Unfortunately, Defendants' use of shell committees and failure to properly disclose their roles prevents Plaintiff from providing any greater specificity prior to discovery.

69. Nonetheless, Defendants are each aware of their specific roles and unique contributions to their defamatory scheme.

70. At all times relevant to this action, all the above-named Defendants were acting in concert.

71. Defendants acted in furtherance of a plan to defame FORS.

72. By defaming FORS, Defendants hoped to influence the outcome of the election for Miami-Dade County Commission, District 6.

73. Defendants disseminated defamatory statements and disinformation in pursuit of their common purpose.

74. Venue is proper in this Court because the parties performed a substantial portion of the acts giving rise to this lawsuit in Miami-Dade County.

75. Among other things, the Defamatory Hit Pieces and Defamatory Website were distributed and otherwise published to thousands of voters in Miami-Dade County.

BACKGROUND

76. FORS graduated law school in 2011, *cum laude*.

77. FORS achieved various academic accolades.

78. FORS is an attorney in good standing with the Florida Bar.

79. FORS operates a law firm with his family.

80. FORS focuses on representing private clients and small businesses in litigation.

81. In 2019, FORS was elected to serve as Commissioner for the City of Coral Gables.

82. FORS' reputation is valuable for his professional and political pursuits.

83. FORS' reputation is valuable for his candidacy for Miami-Dade Commissioner.

84. FORS' reputation is valuable for his good personal standing in his community.

85. As a licensed attorney, FORS' professional reputation is especially critical to his ability to operate his business, a law firm.

86. In May of 2022, FORS qualified as a candidate for Miami-Dade County Commissioner, District 6.

87. CABRERA is running for the same seat.

88. CABRERA is a political operative.

89. CABRERA has been registered as a lobbyist with the State of Florida.

90. CABRERA has been registered as a lobbyist with Miami-Dade County.

91. CABRERA nonetheless falsely describes himself to voters as a "political outsider."

92. In fact, CABRERA is career lobbyist.

93. What is more, CABRERA is or was a member of the Proud Boys.

94. The Proud Boys is a neo-fascist organization that promotes and engages in political violence in the United States.

95. The Proud Boys has been designated as a terrorist group in Canada and New Zealand.

96. CABRERA notoriously took part in a video-documented, violent protest alongside the Proud Boys.

97. The Proud Boys are racists and do not represent American values.

98. CABRERA's concerning behavior with the Proud Boys was extensively covered by the media and denounced by Republican and Democrat leaders alike.

THE DEFAMATORY CAMPAIGN

99. During the period between May 2022 and September 2022, Defendants conspired to fund, organize, coordinate, create, disseminate, and publish the Defamatory Hit Pieces and

Defamatory Website to thousands of Miami-Dade residents to damage FORS' reputation and candidacy.

100. Defendants used SAVE OUR QUALITY OF LIFE to carry-out the defamatory campaign.

101. SAVE OUR QUALITY OF LIFE sent numerous Defamatory Hit Pieces.

102. SAVE OUR QUALITY OF LIFE was the "sponsor" of the Defamatory Website.

103. Defendants concealed their identities and their affiliation with CABRERA by using SAVE OUR QUALITY OF LIFE.

104. Defendants used DADE FIRST to carry-out the defamatory campaign.

105. DADE FIRST sent some of the Defamatory Hit Pieces.

106. DADE FIRST concealed the Defendants' identities and their affiliation with CABRERA by using DADE FIRST.

107. Defendants caused the Defamatory Hit Pieces and Defamatory Website to be distributed to thousands of readily identifiable Miami-Dade County voters.

108. Among other things, the Defamatory Hit Pieces and Defamatory Website:

a. Falsely stated that FORS has been "arrested three times."

b. Falsely stated that FORS was "investigated for fraud."

c. Falsely stated that FORS is a "criminal."

d. Falsely stated that FORS is a "fraud."

e. Falsely stated that FORS "refuses to pay his property taxes."

f. Depicted a very realistic but doctored image depicting FORS in an orange prison jumpsuit, handcuffed, in a jail cell.

g. Falsely implied that FORS was incarcerated in connection with the

aforementioned disinformation.

- h. Falsely stated that FORS has a “history of financial recklessness.”
 - i. Falsely stated that FORS voted to “increase taxes” as a city commissioner.
 - j. Falsely stated that “[t]he same shady motels that are fronts for human trafficking operations are bankrolling” FORS’ candidacy.
 - k. Falsely stated that FORS “had the chance to shut down these criminal enterprises.”
 - l. Falsely stated that Fors “voted against regulating [shady motels].”
 - m. Falsely states that Fors “took their money,” in connection with supposedly “shady motels” that were engaged in “human trafficking.”
 - n. Falsely stated that “[FORS] is in bed with the same shady enterprises that profit off the backs of prostitution through the trafficking of women, men, and children.”
 - o. Falsely displayed an image of two hands bound with rope on a mailer in connection with FORS.
 - p. Falsely wrote, next to the image of the rope bonding hands, Defendants that “HUMAN TRAFFICKING IS MODERN-DAY SLAVERY,” to imply that FORS was somehow responsible.
109. All the foregoing communications are false; specifically:
- a. FORS has never been incarcerated.
 - b. FORS has never been “investigated for fraud.”
 - c. FORS has never been “arrested three times.”
 - d. FORS is not a “criminal.”

- e. FORS has never “refused to pay his property taxes.”
- f. FORS does not have a “history of financial recklessness.”
- g. FORS has never voted to increase taxes as a city commissioner.
- h. FORS has never received a campaign contribution, or any compensation, from an owner, operator, partner, or manager, of a motel.
- i. FORS has never “had the chance to shut down” a motel.
- j. FORS has no affiliation with any “criminal enterprise.”
- k. FORS has no affiliation with any “human trafficking.”
- l. FORS has never voted against regulating motels.
- m. FORS is not “in bed with shady enterprises that profit off the backs of prostitution through the trafficking of women, men, and children.”

110. The Defamatory Hit Pieces and Defamatory Website bear the name and were sent by both SAVE OUR QUALITY OF LIFE and DADE FIRST.

111. Upon information and belief, all the defendants named in this action funded, organized, coordinated, created, disseminated, and published the Defamatory Hit Pieces and Defamatory Website.

112. Although the precise role played by each Defendant has not been fully determined, these facts will be discovered and revealed through the discovery.

113. Plaintiff will propound written party discovery, depositions, and non-party subpoenas and depositions.

114. Furthermore, it is anticipated that such discovery may reveal the participation of additional conspirators not yet identified at this time.

115. Notwithstanding, it is known that:

- a. CABRERA assumed a lead role in creating and coordinating the defamatory campaign.
- b. DADE FIRST directly disseminated a Defamatory Hit Pieces titled “*Republican Voter Guide*,” which bears its name.
- c. DADE FIRST directly disseminated a Defamatory Hit Pieces titled “*Democrat Voter Guide*,” which bears its name.
- d. The “*Republican Voter Guide*” and “*Democrat Voter Guide*” both parrot nearly the same derogatory language about FORS.
- e. These “Guides” were disseminated by the same group, at the same time, in the same area, and were intended to influence the same election.
- f. DADE FIRST has no genuine values.
- g. Instead, DADE FIRST panders to each segment of the population to obtain votes by pretending to share their ideological preferences.
- h. Defendants comprise American values.
- i. Instead, Defendants are pandering.
- j. CITIZENS ALLIANCE provided significant funding to SAVE OUR QUALITY OF LIFE for the purpose of funding the defamatory campaign.
- k. DADE FIRST provided significant funding to CITIZENS ALLIANCE, including on July 14, 2022, for the purpose of funding the defamatory campaign.
- l. PEDICINI, PICCOLO, and MILLNER designed, coordinated, and carried-out the defamatory campaign by and through SIMWINS, which dedicated its resources to the group’s common goal.

- m. MIRANDA and ADVOCACY acted to further the aims of Defendants, and when FORS sent a Cease-and-Desist letter to a lawyer known to represent Defendants, the Defamatory website was taken off-line.

116. The falsity of the Defamatory Hit Pieces and Defamatory Website is easily verifiable.

117. The Defendants acted with knowledge of the falsity of the statements contained in the Defamatory Hit Pieces.

118. The Defendants acted with knowledge of the falsity of the statements contained in the Defamatory Website.

119. Defendants' statements could be publicly verified.

120. Defendants therefore acted with reckless disregard for whether their statements were true or false, including that:

- a. FORS has never been incarcerated,
- b. FORS has never been "investigated for fraud,"
- c. FORS has never been "arrested,"
- d. FORS is not a "criminal,"
- e. FORS has never "refused to pay his property taxes,"
- f. FORS does not have a "history of financial recklessness," and,
- g. FORS has never voted to increase taxes as a city commissioner.

121. In fact, all the aforementioned disinformation was false.

122. Notwithstanding, Defendants knowingly published the Defamatory Hit Pieces.

123. Notwithstanding, Defendants knowingly published the Defamatory Website.

124. Notwithstanding, Defendants knowingly published false statements and doctored

images of FORS.

125. Defendants deliberately published the Defamatory Hit Pieces.

126. Defendants deliberately published the Defamatory Website.

127. Defendants acted for the sole purpose of harming FORS.

128. Defendants are motivated by their hope that they would give CABRERA an improper advantage against FORS in the election.

129. Defendants hope to distract from the stark disparity between CABRERA and FORS' respective qualifications and support.

130. FORS received numerous inquiries from persons who were concerned by the assertions in the Defamatory Hit Pieces.

131. FORS received numerous inquiries from persons who were concerned by the assertions in the Defamatory Website.

132. Although FORS has explained the falsity of the allegations, upon information and belief, not all voters are mollified.

133. FORS has wasted substantial time and money rebutting false allegations.

134. FORS has better things to do with his time, such as practice law, raise money, meet new voters, or spend time with family.

135. Defendants have caused FORS substantial mental anguish and anxiety through their defamation.

136. FORS' campaign, and professional and personal reputation, have been injured by the Defamatory Hit Pieces.

137. FORS' campaign, and professional and personal reputation, have been injured by the Defamatory Website.

138. Defendants started their defamatory campaign before the Primary on August 23, 2022.

139. Nonetheless, their impact was limited because the Campaign was a four-way race.

140. Defendants hoped to eliminate FORS because he is a viable candidate in a non-partisan race due to his emergence as a voice of reason in local politics.

141. Thus, Defendants could not hope to beat FORS heads up without resorting to improper tactics.

142. When FORS made the runoff against CABRERA, Defendants' defamation became more strident.

143. Defendants realized that all their defamation would result in an advantage for CABRERA, rather than another candidate, in a heads-up runoff.

144. Further, FORS is suffering greater damages in the heads-up general than in the four-way primary.

145. Thus, FORS has no choice but to initiate this litigation.

146. FORS recently sent a statutory Cease and Desist letter to a lawyer known to represent Defendants.

147. Although the lawyer denied involvement, and threatened undersigned counsel, the website was removed that same business day.

148. Nonetheless, FORS lacks any way to prevent future display of the website, or other dissemination of defamatory materials.

149. FORS has retained undersigned counsel.

150. FORS is paying undersigned counsel a reasonable fee for his services.

151. FORS' attorney fees are an item of damages sustained in connection with this

defamation and the effort to clear his good name, for which he seeks recovery.

COUNT I
(DEFAMATION v. CABRERA)

152. FORS re-states and re-alleges each general allegation herein but states the pertinent facts below.

153. CABRERA made the false statements about FORS that are contained in the Defamatory Hit Pieces and Defamatory Website, and created and disseminated the doctored images contained therein, naming SAVE OUR QUALITY OF LIFE and DADE FIRST as the senders to conceal his identity.

154. The Defamatory Hit Pieces and Defamatory Website were, and continue to be, published, and disseminated to thousands of readily identifiable Miami-Dade County residents via mail, text message, and internet publication.

155. The Defamatory Hit Pieces and Defamatory Website were published with either knowledge of their falsity or reckless disregard for the truth.

156. The Defamatory Hit Pieces and Defamatory Website were published with actual malice to injure FORS. Specifically, CABRERA knowingly disregarded publicly verifiable information showing the falsity of the statements, including that FORS has never been incarcerated, that FORS has never been “investigated for fraud,” that FORS has never been “arrested three times.” that FORS is not a “criminal,” that FORS has never “refused to pay his property taxes,” that FORS does not have a “history of financial recklessness,” and that FORS has never voted to increase taxes as a city commissioner.

157. The Defamatory Hit Pieces and Defamatory Website are actionable on their face, *per se*.

158. The Defamatory Hit Pieces and Defamatory Website have caused FORS special harm and injury to FORS because he is running for Miami-Dade County Commissioner.

159. The falsity of the Defamatory Hit Pieces and Defamatory Website have also caused FORS special harm and injury to FORS because he is a licensed attorney and, as such, his livelihood directly depends on the public's perception of, and trust in, his professionalism, character, trustworthiness, and reputation.

160. WHEREFORE, Plaintiff, FORS, demands judgment for compensatory damages, including special damages, against Defendant, as well as costs, attorney fees, and such other relief as this Court deems just and proper.

COUNT II
(DEFAMATION vs. DADE FIRST)

161. FORS re-states and re-alleges each general allegation herein but states the pertinent facts below.

162. DADE FIRST made the false statements about FORS that are contained in the Defamatory Hit Pieces.

163. DADE FIRST made the false statements about FORS that are contained in the Defamatory Website.

164. DADE FIRST created and disseminated the doctored images of FORS.

165. The Defamatory Hit Pieces and Defamatory Website were, and continue to be, published, and disseminated to thousands of Miami-Dade County residents.

166. DADE FIRST discussed FORS via mail.

167. DADE FIRST discussed FORS via text message.

168. DADE FIRST discussed FORS via internet publication.

169. DADE FIRST made the false statements about FORS that are contained in the Defamatory Hit Pieces.

170. DADE FIRST made the false statements about FORS that are contained in the Defamatory Website.

171. DADE FIRST created and disseminated the doctored images of FORS.

172. The Defamatory Hit Pieces and Defamatory Website were published with either knowledge of its falsity or reckless disregard for the truth.

173. The Defamatory Hit Pieces and Defamatory Website were published with actual malice to injure FORS.

174. Specifically, DADE FIRST knowingly disregarded publicly verifiable information showing the falsity of the statements.

175. FORS has never been incarcerated.

176. FORS has never been “investigated for fraud.”

177. FORS has never been “arrested three times.”

178. FORS is not a “criminal.”

179. FORS has never “refused to pay his property taxes.”

180. FORS does not have a “history of financial recklessness.”

181. FORS has never voted to increase taxes as a city commissioner.

182. Each of the foregoing facts was ascertainable through reasonable diligence.

183. Defendants either conducted reasonable diligence and knew their assertions were false, or they deliberately failed to conduct reasonable diligence, and thereby had a reckless disregard for the truth.

184. Defendants always acted for the purpose of harming the reputation of FORS.

185. The Defamatory Hit Pieces and Defamatory Website are actionable on their face, per se.

186. The Defamatory Hit Pieces and Defamatory Website have caused FORS special harm and injury to FORS because he is running for Miami-Dade County Commissioner.

187. The falsity of the Defamatory Hit Pieces and Defamatory Website have also caused FORS special harm and injury to FORS.

188. FORS is a licensed attorney and, as such, his livelihood directly depends on the public's perception of his professionalism, character, trustworthiness, and reputation.

189. WHEREFORE, Plaintiff, FORS, demands judgment for compensatory damages, including special damages, against Defendant, as well as well as costs, attorney fees, and such other relief as this Court deems just and proper.

COUNT III
(DEFAMATION vs. SAVE OUR QUALITY OF LIFE)

190. FORS re-states and re-alleges each general allegation herein but states the pertinent facts below.

191. SAVE OUR QUALITY OF LIFE made the false statements about FORS that are contained in the Defamatory Hit Pieces.

192. SAVE OUR QUALITY OF LIFE made the false statements about FORS that are contained in the Defamatory Website.

193. SAVE OUR QUALITY OF LIFE created and disseminated the doctored images of FORS.

194. The Defamatory Hit Pieces and Defamatory Website were, and continue to be, published, and disseminated to thousands of Miami-Dade County residents.

195. SAVE OUR QUALITY OF LIFE discussed FORS via mail.

196. SAVE OUR QUALITY OF LIFE discussed FORS via text message.
197. SAVE OUR QUALITY OF LIFE discussed FORS via internet publication.
198. The Defamatory Hit Pieces were published with either knowledge of their falsity or reckless disregard for the truth.
199. The Defamatory Website was published with either knowledge of its falsity or reckless disregard for the truth.
200. The Defamatory Hit Pieces and Defamatory Website were published with actual malice to injure FORS.
201. Specifically, SAVE OUR QUALITY OF LIFE knowingly disregarded publicly verifiable information showing the falsity of its statements about FORS.
202. FORS has never been incarcerated.
203. FORS has never been “investigated for fraud.”
204. FORS has never been “arrested three times.”
205. FORS is not a “criminal.”
206. FORS has never “refused to pay his property taxes.”
207. FORS does not have a “history of financial recklessness.”
208. FORS has never voted to increase taxes as a city commissioner.
209. Each of the foregoing facts was ascertainable through reasonable diligence.
210. Defendants either conducted reasonable diligence and knew their assertions were false, or they deliberately failed to conduct reasonable diligence, and thereby had a reckless disregard for the truth.
211. Defendants always acted for the purpose of harming the reputation of FORS.

212. The Defamatory Hit Pieces and Defamatory Website are actionable on their face, per se.

213. The Defamatory Hit Pieces and Defamatory Website have caused FORS special harm and injury to FORS because he is running for Miami-Dade County Commissioner.

214. The falsity of the Defamatory Hit Pieces and Defamatory Website have also caused FORS special harm and injury to FORS because he is a licensed attorney.

215. FORS' livelihood directly depends on the public's perception of his professionalism, character, trustworthiness, and reputation.

216. WHEREFORE, Plaintiff, FORS, demands judgment for compensatory damages, including special damages, against Defendant, as well as well as costs, attorney fees, and such other relief as this Court deems just and proper.

COUNT IV
(DEFAMATION vs. PEDICINI, PICCOLO, and MILLNER)

217. FORS re-states and re-alleges each general allegation herein but states the pertinent facts below.

218. PEDICINI made the false statements about FORS that are contained in the Defamatory Hit Pieces.

219. PEDICINI made the false statements about FORS that are contained in the Defamatory Website.

220. PEDICINI created and disseminated the doctored images of FORS.

221. PEDICINI named SAVE OUR QUALITY OF LIFE and DADE FIRST as the senders to conceal his identity.

222. The Defamatory Hit Pieces and Defamatory Website were, and continue to be, published, and disseminated to thousands of Miami-Dade County.

223. PEDICINI discussed FORS via mail.
224. PEDICINI discussed FORS via text message.
225. PEDICINI discussed FORS via internet publication.
226. PEDICINI defamed FORS to Miami-Dade residents via mail, text message, and internet publication.
227. The Defamatory Hit Pieces and Defamatory Website were published with either knowledge of its falsity or reckless disregard for the truth.
228. The Defamatory Hit Pieces and Defamatory Website were published with actual malice to injure FORS.
229. Specifically, PEDICINI knowingly disregarded publicly verifiable information showing the falsity of the statements.
230. FORS has never been incarcerated.
231. FORS has never been “investigated for fraud.”
232. FORS has never been “arrested three times.”
233. FORS is not a “criminal.”
234. FORS has never “refused to pay his property taxes.”
235. FORS does not have a “history of financial recklessness.”
236. FORS has never voted to increase taxes as a city commissioner.
237. Each of the foregoing facts was ascertainable through reasonable diligence.
238. Defendant PICCOLO assisted with, encouraged, or ratified PEDICINI’s conduct.
239. Defendant MILLNER assisted with, encouraged, or ratified PEDICINI’s conduct.
240. Defendants MILLNER and PICCOLO each assisted with, encouraged, or ratified the conduct of each other Defendant, including each other.

241. Defendants either conducted reasonable diligence and knew their assertions were false, or they deliberately failed to conduct reasonable diligence, and thereby had a reckless disregard for the truth.

242. Defendants always acted for the purpose of harming the reputation of FORS.

243. The Defamatory Hit Pieces and Defamatory Website are actionable on their face, per se.

244. The Defamatory Hit Pieces and Defamatory Website have caused FORS special harm and injury to FORS because he is running for Miami-Dade County Commissioner.

245. The falsity of the Defamatory Hit Pieces and Defamatory Website have also caused FORS special harm and injury to FORS because he is a licensed attorney and, as such, his livelihood directly depends on the public's perception of his professionalism, character, trustworthiness, and reputation.

246. WHEREFORE, Plaintiff, FORS, demands judgment for compensatory damages, including special damages, against Defendant, as well as well as costs, attorney fees, and such other relief as this Court deems just and proper.

COUNT V
(DEFAMATION vs. ALEJANDRO MIRANDA AND MIRANDA ADVOCACY)

247. FORS re-states and re-alleges each general allegation herein but states the pertinent facts below.

248. MIRANDA and ADVOCACY made the false statements about FORS that are contained in the Defamatory Hit Pieces and Defamatory Website, and created and disseminated the doctored images contained therein, naming SAVE OUR QUALITY OF LIFE and DADE FIRST as the senders to conceal his identity.

249. MIRANDA acted through ADVOCACY and as its agent.

250. As such, MIRANDA is not protected by any corporate immunity for his actions through ADVOCACY.

251. The Defamatory Hit Pieces and Defamatory Website were, and continue to be, published, and disseminated to thousands of Miami-Dade County.

252. MIRANDA discussed FORS via mail.

253. MIRANDA discussed FORS via text message.

254. MIRANDA discussed FORS via and internet publication.

255. The Defamatory Hit Pieces and Defamatory Website were published with either knowledge of its falsity or reckless disregard for the truth.

256. The Defamatory Hit Pieces and Defamatory Website were published with actual malice to injure FORS.

257. Specifically, MIRANDA and ADVOCACY knowingly disregarded publicly verifiable information showing the falsity of the statements.

258. FORS has never been incarcerated.

259. FORS has never been “investigated for fraud.”

260. FORS has never been “arrested three times.”

261. FORS is not a “criminal.”

262. FORS has never “refused to pay his property taxes.”

263. FORS does not have a “history of financial recklessness.”

264. FORS has never voted to increase taxes as a city commissioner.

265. Each of the foregoing facts was ascertainable through reasonable diligence.

266. Defendants either conducted reasonable diligence and knew their assertions were false, or they deliberately failed to conduct reasonable diligence, and thereby had a reckless disregard for the truth.

267. Defendants always acted for the purpose of harming the reputation of FORS.

268. The Defamatory Hit Pieces and Defamatory Website are actionable on their face, per se.

269. The Defamatory Hit Pieces and Defamatory Website have caused FORS special harm and injury to FORS because he is running for Miami-Dade County Commissioner.

270. The falsity of the Defamatory Hit Pieces and Defamatory Website have also caused FORS special harm and injury to FORS because he is a licensed attorney and, as such, his livelihood directly depends on the public's perception of his professionalism, character, trustworthiness, and reputation.

271. WHEREFORE, Plaintiff, FORS, demands judgment for compensatory damages, including special damages, against Defendant, as well as well as costs, attorney fees, and such other relief as this Court deems just and proper.

COUNT VI
(CIVIL CONSPIRACY vs. All Defendants)

272. FORS re-states and re-alleges each general allegation herein but states the pertinent facts below.

273. The Defendants, CABRERA, DADE FIRST, SAVE OUR QUALITY OF LIFE, PEDICINI, PICCOLO, MILLNER, SIMWINS, CITIZENS ALLIANCE, MIRANDA, ADVOCACY, JOHN DOE #1, JOHN DOE#2, JOHN DOE#3, JOHN DOE #4, and JANE DOE, conspired to formulate a plan, and entered into an agreement to defame FORS for the purpose of

influencing the outcome of the Miami-Dade County Commission election through the dissemination of defamatory statements and disinformation.

274. The Defendants each assisted in carrying-out the defamatory campaign by engaging in known, and unknown, overt acts in furtherance of their agreement including.

275. Defendants raised monies for the purpose of funding the defamatory campaign.

276. Defendants employed their influence and positions to raise monies for the purpose of funding the defamatory campaign.

277. Defendants funded the dissemination of the defamatory statements and images.

278. Defendants drafted and co-drafted the defamatory statements and images.

279. Defendants published the defamatory statements and images.

280. CABRERA made the subject statements.

281. CABRERA funded for the creation, production, and dissemination of the subject statements.

282. DADE FIRST made the subject statements.

283. DADE FIRST handled funds for their creation, production, and dissemination of the subject statements.

284. DADE FIRST is also vicariously liable for CABRERA's defamatory conduct because CABRERA is an authorized agent of DADE FIRST.

285. SAVE OUR QAULITY OF LIFE made the subject statements and paid and raised funds for their creation, production, and dissemination.

286. SAVE OUR QAULITY OF LIFE is also vicariously liable for CABRERA and PEDICINI's defamatory conduct because CABRERA and PEDICINI are authorized agents of SAVE OUR QUALITY OF LIFE.

287. PEDICINI made the subject statements, designed them, and assisted with their creation, production, and dissemination.

288. PICCOLO made the subject statements, designed them, and assisted with their creation, production, and dissemination.

289. MILLNER made the subject statements, designed them, and assisted with their creation, production, and dissemination.

290. SIMWINS made the subject statements, designed them, and assisted with their creation, production, and dissemination.

291. SIMWINS is also vicariously liable for PEDICINI, PICCOLO, and MILLNER's defamatory conduct because they are authorized agents of SIMWINS.

292. CITIZENS ALLIANCE paid and raised funds for the creation, production, and dissemination of the defamatory statements.

293. CITIZENS ALLIANCE is also vicariously liable for CABRERA, PEDICINI, PICCOLO, and MILLNER's defamatory conduct because they are authorized agents of CITIZENS ALLIANCE.

294. MIRANDA and ADVOCACY are also vicariously liable for defamatory conduct of the other Defendants because they functioned as agents of the other Defendants.

295. JOHN DOE #1, JOHN DOE #2, JOHN DOE #3, JOHN DOE #4, and JANE DOE made the subject statements and paid and raised funds for their creation, production, and dissemination.

296. Each Defendant functioned as an agent or accomplice to each other Defendant.

297. Each Defendant acted for the purpose of harming FORS' reputation.

298. Each Defendants acted to help CABRERA by alienating voters from FORS.

299. Each Defendants thereby acted to increase his own power and standing by electing CABRERA and preventing the election of FORS.

300. As a direct result of the conspiracy, FORS has been damaged; specifically, the Defamatory Hit Pieces and Defamatory Website have caused FORS special harm and injury to FORS because he is running for Miami-Dade County Commissioner.

301. The falsity of the Defamatory Hit Pieces and Defamatory Website have caused FORS special harm and injury because he is a licensed attorney.

302. FORS' livelihood directly depends on the public's perception of his professionalism, character, trustworthiness, and reputation.

303. WHEREFORE, Plaintiff, FORS, demands judgment for compensatory damages, including special damages, against Defendants, as well as well as costs, attorney fees, and such other relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

304. FORS demands a jury trial as to all issues so triable.

INTENT TO SEEK ATTORNEY FEES AS SPECIAL DAMAGES

305. FORS intends to seek attorney fees as special damages as the damages of defamation due to the cost of clearing his name from Defendants false allegations.

INTENT TO SEEK PUNITIVE DAMAGES

306. In accordance with Florida law, FORS will seek to amend this Complaint and demand punitive damages as appropriate.

Filed: September 23, 2022.

BELTRAN LITIGATION, P.A

Attorneys for Plaintiff

1101 E. Cumberland Ave., Ste 712

Tampa, Florida 33602-4231

(813) 870-3073

/s/ Michael Paul Beltran

MICHAEL P. BELTRAN, ESQ.

Florida Bar No. 93184

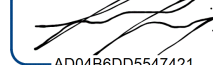
mike@beltranlitigation.com

VERIFICATION

Under penalties of perjury, I declare that I have read the Verified Complaint, that I agree with the document, and that the facts stated therein are true.

Date: September 21, 2022.

DocuSigned by:



AD04B6DD5547421...

Jorge Fors

(Verification made pursuant to Fla. Stat. § 92.525(2); see *State v. Shearer*, 628 So.2d 1102 (1993) ("In addition to a notarized oath such as the one in rule 3.987, however, section 92.525, Florida Statutes (1991), provides that a signed declaration can substitute for a notarized oath if it contains the following language: 'Under penalties of perjury, I declare that I have read the foregoing [document] and that the facts stated in it are true.'"))

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COMPOSITE EXHIBIT A
1 of 8

DEMOCRATIC VOTER GUIDE

MIAMI-DADE COUNTY COMMISSION, DISTRICT 6

1*1563**SCH 5-DIGIT 33155 FSSC
OR CURRENT RESIDENT
MIAMI FL 33155-4937



**THE FACTS HEREIN HAVE BEEN CHECKED AND DOCUMENTED ON THE BEHALF OF VOTERS.
PLEASE REVIEW THE RECORDS AND VOTE IN THE
AUGUST 23RD PRIMARY ELECTION.**

DEMOCRATIC VOTER GUIDE

MIAMI-DADE COUNTY COMMISSION DISTRICT SIX

CANDIDATE	KEVIN MARINO CABRERA	JORGE FORS
CREDENTIALS	<ul style="list-style-type: none"> • Community leader and activist • Stands with and endorsed by organized labor 	<ul style="list-style-type: none"> X Voted to raise your taxes¹ X Increased fees while serving as a Coral Gables City Commissioner² X Career politician
ENDORSEMENTS	<ul style="list-style-type: none"> • Associated Builders & Contractors • Service Employees International Union, Local 1991 	<ul style="list-style-type: none"> X Developers X Special interests trying to buy a seat on the County Commission
PERSONAL CHARACTER & REPUTATION	<ul style="list-style-type: none"> • First-time candidate; not a career politician • Managed family-owned pharmacy • Led a local logistics company 	<p>History of financial recklessness, cheating taxpayers, and arrests:</p> <ul style="list-style-type: none"> X Investigated for illegally taking a homestead exemption on a house he did not live in³ X 31 traffic citations including driving with a suspended license⁴ X 3 arrests⁵ X Multiple infractions for illegally parking in a handicapped designated space⁶
PLATFORM	<ul style="list-style-type: none"> • Freeze property taxes countywide • Permanently enact cuts to the gas tax • Cut local fees and taxes and put more of your hard-earned money back in your pocket • Protect our most vulnerable citizens from burdensome taxation 	<ul style="list-style-type: none"> X Raise fees and increase taxes like he did in 2020 while serving as a Coral Gables City Commissioner⁷ X Vote with the same special interests who are funding his campaign and trying to buy a seat on the County Commission X Refuse to pay his property taxes while the rest of us pay ours⁸

¹ Coral Gables Annual Budget, 2019-2020
² Coral Gables Annual Budget, 2019-2020
³ Miami-Dade County Property Appraiser's Office
⁴ Miami-Dade County clerk of the Courts - Traffic Division
⁵ Duval County Clerk of the Courts
⁶ Miami-Dade County clerk of the Courts - Traffic Division
⁷ Coral Gables Annual Budget, 2019-2020
⁸ Miami-Dade County Property Appraiser's Office

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REPUBLICAN VOTER GUIDE

MIAMI-DADE COUNTY COMMISSION, DISTRICT 6

1*3048**SCH 5-DIGIT 33134 FSSC

CORAL GABLES FL 33134-2235



COMPOSITE EXHIBIT A

**THE FACTS HEREIN HAVE BEEN CHECKED AND DOCUMENTED ON THE BEHALF OF VOTERS.
PLEASE REVIEW THE RECORDS AND VOTE IN THE
AUGUST 23RD PRIMARY ELECTION.**

REPUBLICAN VOTER GUIDE

MIAMI-DADE COUNTY COMMISSION DISTRICT SIX

CANDIDATE	KEVIN MARINO CABRERA	JORGE FORS
CREDENTIALS	<ul style="list-style-type: none"> • Lifelong Republican • Committed to limiting government overreach, reducing our tax burden, and permanently enacting cuts to the gas tax 	<ul style="list-style-type: none"> X Voted to raise your taxes¹ X Increased resident fees while serving as a Coral Gables City Commissioner² X Career politician
ENDORSEMENTS	<ul style="list-style-type: none"> • President Donald J. Trump • Congresswoman Maria Elvira Salazar • State Fire Marshal & CFO Jimmy Patronis • Hialeah Mayor Esteban Bova • Hispanic Police Officers Association • Associated Builders & Contractors 	<ul style="list-style-type: none"> X RINOs X Developers X Special interests trying to buy a seat on the County Commission
PERSONAL CHARACTER & REPUTATION	<ul style="list-style-type: none"> • First-time candidate; not a career politician • Led President Donald J. Trump's re-election campaign in Florida • Managed family-owned pharmacy • Led a local logistics company 	<p>History of financial recklessness, cheating taxpayers, and arrests:</p> <ul style="list-style-type: none"> X Investigated for illegally taking a homestead exemption on a house he did not live in³ X 31 traffic citations including driving with a suspended license⁴ X 3 arrests⁵ X Multiple infractions for illegally parking in a handicapped designated space⁶
PLATFORM	<ul style="list-style-type: none"> • Freeze property taxes countywide • Permanently enact cuts to the gas tax • Cut local fees and taxes and put more of your hard-earned money back in your pocket • Ensure law enforcement has the resources necessary to keep us safe • Protect our most vulnerable citizens from burdensome taxation 	<ul style="list-style-type: none"> X Raise fees and increase taxes like he did in 2020 while serving as a Coral Gables City Commissioner⁷ X Vote with the same special interests who are funding his campaign and trying to buy a seat on the County Commission X Refuse to pay his property taxes while the rest of us pay ours⁸

¹ Coral Gables Annual Budget, 2019-2020

² Coral Gables Annual Budget, 2019-2020

³ Miami-Dade County Property Appraiser's Office

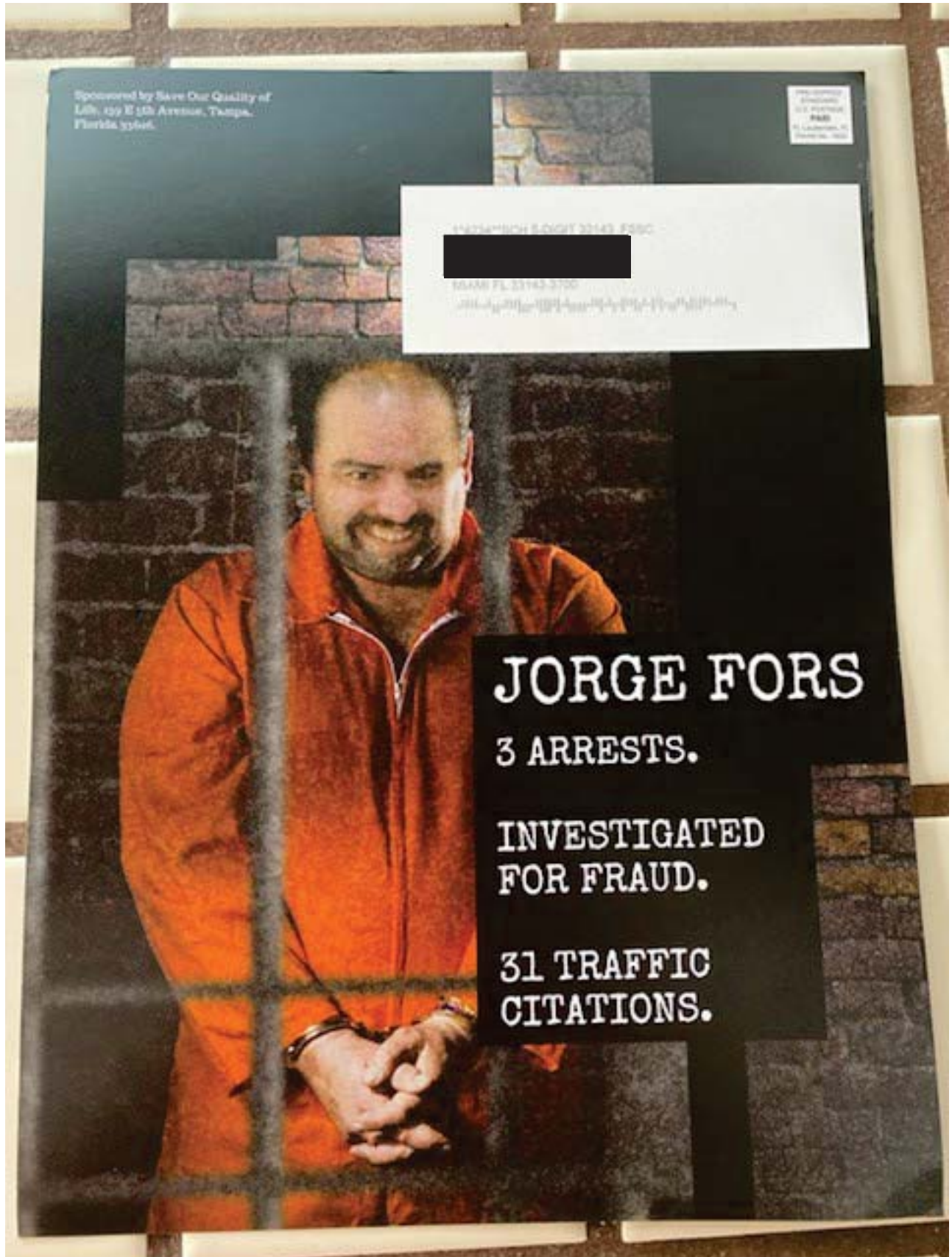
⁴ Miami-Dade County clerk of the Courts - Traffic Division

⁵ Alachua County Clerk of the Courts

⁶ Miami-Dade County clerk of the Courts - Traffic Division

⁷ Coral Gables Annual Budget, 2019-2020

⁸ Miami-Dade County Property Appraiser's Office



COMPOSITE EXHIBIT A

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JORGE FORS IS A FRAUD

Jorge Fors the Fraud was **arrested three times**, investigated for **illegally taking a homestead exemption**, and cited for 31 traffic violations including **parking in a handicapped parking space** multiple times.*

The Miami-Dade County Property Appraiser flat out stated Fors' homestead exemption said: "that's illegal."¹

Fors the Fraud paid \$13,178.37 all at one for back taxes he got out of a condo as well as interest and penalties for the years 2010 through 2017.*

Does Jorge Fors the Fraud sound like a positive example for our community?

CRIMINALS AND FRAUDSTERS SHOULDN'T LEAD OUR COMMUNITY

*Miami-Dade County Clerk of the Courts, Miami-Dade County Property Appraiser's Office, Miami-Dade County Clerk of the Courts, Traffic Division
¹Wally Garcia, Miami-Dade County Property Appraiser
*Miami-Dade County Property Appraiser's Office as reported by FolliesConrad.com

Learn more at www.forshefraud.com.

COMPOSITE EXHIBIT A
6 of 8

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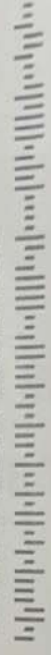
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HUMAN TRAFFICKING IS MODERN-DAY SLAVERY



4*14280**SCH 5-DIGIT 33114

CORAL GABLES FL 33134-2253



COMPOSITE EXHIBIT A

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HUMAN TRAFFICKING

PUBLIC SERVICE ANNOUNCEMENT

The same shady motels that are fronts for human trafficking operations are bankrolling

JORGE FORS' CANDIDACY FOR COUNTY COMMISSION.

(State of Florida, Division of Elections, Committee Search: Coral Gables City Clerk of the Courts, Campaign Finance Activity)

But when **JORGE FORS** had the chance to shut down these criminal enterprises, he voted against regulating them **AND** took their money.

(City of Coral Gables Commission Meeting, 08/24/2022)

“Florida has a zero-tolerance policy against human trafficking — which is modern-day slavery, and often involves children. **One survey found hotels and motels to be the single most-common venue for sex trafficking...**”

(Orlando Sentinel, Hotel-motel sex trafficking — Florida is ripe for a crackdown)

JORGE FORS is in bed with the same shady enterprises that profit off the backs prostitution through the trafficking of women, men, and children.

(State of Florida, Division of Elections, Committee Search: Coral Gables City Clerk of the Courts, Campaign Finance Activity)

**JORGE FORS VIOLATED OUR TRUST
JORGE FORS IS UNFIT TO SERVE.**

COMPOSITE EXHIBIT A