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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

MICHAEL CAMILLERI and
SHAWNA CAMILLERI,

Case No.

Plaintiffs,

vs.

ANDREA VICTORIA COHEN,

Defendant.

COMPLAINT

Plaintiffs Michael Camilleri and Shawna Camilleri (sometimes collectively referred to as the "Camilleris") sue Defendant Andrea Victoria Cohen ("Cohen") and allege as follows:

The Parties, Jurisdiction, and Venue

1. Plaintiff Michael Camilleri is a resident of Palm Beach County, Florida.
2. Plaintiff Shawna Camilleri is a resident of Palm Beach County, Florida.
3. Defendant Cohen is a resident of Palm Beach County, Florida.
4. Jurisdiction is proper in this Court because the amount in controversy exceeds \$30,000.00, exclusive of interest, costs, and attorneys' fees.
5. Venue for this action is proper in this Court pursuant to section 47.011, Florida Statutes, because the Defendant resides in Palm Beach County and the cause of action alleged herein arose in Palm Beach County.
6. All conditions precedent to this action have been performed, have occurred, or have been waived or otherwise satisfied.

COUNT I
Defamation

7. The Camilleris have recently become aware that a letter had been published about

them (the “Letter”). A copy of the Letter is attached as **Exhibit A**.

8. The Letter accuses the Camilleris of, among other things, being “scam artists” who run a “pyramid scheme to fund their insurance business.” The Letter further accuses the Camilleris of being “deceitful” and engaging in federal income tax improprieties.

9. These outrageous statements in the Letter are objectively and demonstrably false.

10. Upon information and belief, Cohen published the Letter in a group text or similar “chat” communication involving 16 others who are residents and neighbors in the Camilleris’ community.

11. Cohen thus made false statements about the Camilleris.

12. Cohen knew that the statements were false, or at the very least had serious doubts as to their truth.

13. Cohen’s publication exposed the Camilleris to hatred, distrust, ridicule, contempt, and disgrace. On their face, the statements falsely accuse the Camilleris of engaging in unethical and illegal conduct, and thus tended to injure the Camilleris’ reputation, including in their business, trade, and profession, and constitute defamation *per se*.

14. Cohen’s false statements have caused damage to the Camilleris.

WHEREFORE, the Plaintiffs hereby demand judgment against the Defendant for compensatory and consequential damages, pre-judgment interest, the costs of bringing this action, and any other relief which the Court deems just and appropriate. Plaintiffs reserve the right to amend this claim to seek an award of punitive damages upon a proper showing.

Demand for Jury Trial

Plaintiffs hereby demand a trial by jury on all claims so triable.

Dated: July 21, 2021.

By: /s/ Joseph G. Galardi
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EXHIBIT A

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BEWARE WE HAVE SCAM ARTISTS LIVING AMONGST US!!!

Our neighbors, Shawna and Michael Camilleri are scam artists. They convinced my husband and I to invest \$200,000 in their insurance company. DO NOT invest in with them!!!! You will never see your money again.

They will befriend you and play the sympathy card to suck you in. The wife does all the dirty work and uses her kids to lure you in. You will donate to her charity or invest in his business and then your money is used to pay their debts. They owe the IRS millions of dollars. They run a pyramid scheme to fund their insurance company.

They moved from Bocaire and collect rent from their house there to pay for their mortgage here. They do NOT declare the income to the IRS. Research them for yourself and make your own determination. Check out the Palm Beach County records.

Of course, they invite everyone to do an Easter Egg hunt at their house. They need more suckers.

DO NOT TRUST THEM!!!! I was hoping to move into a nice neighborhood with nice families and we were scammed right away. I can't believe we fell for their deceitful acts of kindness!!!



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