

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

THOMAS A. CALIA, an individual,
GILDA CALIA, an individual, and
KEVIN J. CALIA, an individual,
Plaintiffs,

v.

CASE NO.: _____

JURY TRIAL DEMANDED

AMIE LYNN CALIA, an individual,
Defendant.

_____ /

VERIFIED COMPLAINT

Plaintiffs Thomas A. Calia (“Thomas”), Gilda Calia (“Gilda”), and Kevin J. Calia (“Kevin”), each in his or her individual capacity, sue Defendant Amie Lynn Calia (“Defendant”) and allege as follows:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Thomas A. Calia is a natural person sui juris over the age of eighteen who is domiciled in the State of Florida, where he maintains his home of record and a Florida driver license, and who is presently residing in Honolulu, Hawaii on a temporary government-service assignment, with the intent to return to Florida. Thomas is a brother of decedent Christopher S. Calia. Thomas brings this action solely in his individual capacity. No fiduciary, representative, or estate-related claim is asserted in this action, and this action is not brought on behalf of any estate.

2. Plaintiff Gilda Calia is a natural person sui juris over the age of eighteen, residing in Lake Worth, Palm Beach County, Florida. Gilda is the mother of decedent Christopher S. Calia. Gilda

brings this action solely in her individual capacity. No fiduciary, representative, or estate-related claim is asserted in this action, and this action is not brought on behalf of any estate.

3. Plaintiff Kevin J. Calia is a natural person sui juris over the age of eighteen who is domiciled in the State of Florida, where he maintains his home of record and a Florida driver license, and who is presently residing in Denver, Colorado on a temporary government-service assignment, with the intent to return to Florida. Kevin is a brother of decedent Christopher S. Calia. Kevin brings this action solely in his individual capacity. No fiduciary, representative, or estate-related claim is asserted in this action, and this action is not brought on behalf of any estate.

4. Defendant Amie Lynn Calia is a natural person sui juris residing at 9788 Boca Gardens Circle North, Apartment D, Boca Raton, Palm Beach County, Florida 33496. Defendant was the spouse of decedent Christopher S. Calia at the time of his death on February 14, 2025.

5. This Court has subject-matter jurisdiction under section 26.012, Florida Statutes, because the amount in controversy exceeds \$50,000.00, exclusive of costs, interest, and attorneys' fees.

6. This Court has personal jurisdiction over Defendant because Defendant resides in Palm Beach County, Florida, and engaged in the conduct alleged herein in Palm Beach County, Florida.

7. Venue is proper in Palm Beach County under sections 47.011 and 47.021, Florida Statutes, because Defendant resides in Palm Beach County and the causes of action accrued in Palm Beach County.

CONDITIONS PRECEDENT

8. All conditions precedent to the institution and maintenance of this action have been performed, have occurred, have been waived, or have been excused. Fla. R. Civ. P. 1.120(c).

9. Without conceding that section 770.01, Florida Statutes, applies to Defendant, and solely as a conditional backstop to the extent any notice under section 770.01 was required; on June 2, 2026, each Plaintiff executed a written pre-suit notice identifying the publication described below and the statements alleged to be false and defamatory. On June 3, 2026, the three notices were deposited together with the United States Postal Service by Certified Mail, Return Receipt Requested, in three packages addressed to Defendant at (a) Defendant's residence, USPS Article No. 9589 0710 5270 4229 8102 32; (b) Defendant's place of business, USPS Article No. 9589 0710 5270 4229 8102 25; and (c) in care of counsel who represents Defendant in a related matter, USPS Article No. 9589 0710 5270 4229 8102 18, with a courtesy electronic copy contemporaneously transmitted to that counsel. Each of the three certified-mail packages contained all three Plaintiffs' notices. According to United States Postal Service records, delivery was made to Defendant's residence on June 5, 2026, at 5:13 p.m., to Defendant's place of business on June 5, 2026, at 11:56 a.m., and in care of Defendant's counsel on June 8, 2026, at 3:35 p.m. The notices, together with proof of mailing and delivery, are attached as Composite Exhibit B.

10. Each notice identified the correction and retraction opportunity provided by section 770.02, Florida Statutes. No full and fair correction, apology, or retraction was published in the same medium and in substantially as conspicuous a manner as the original publication before the filing of this action.

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

A. The Calia Family and the Decedent

11. Christopher S. Calia (the “Decedent”) died on February 14, 2025, in Palm Beach County, Florida.

12. Plaintiffs Thomas A. Calia and Kevin J. Calia are the brothers of the Decedent, and Plaintiff Gilda Calia is the mother of the Decedent. Other than Defendant herself, those three persons comprised the Decedent’s immediate surviving family known to viewers of the Snapchat Publication.

13. The composition of the Decedent’s immediate family, other than Defendant, is publicly knowable as consisting of his mother and his two brothers. Defendant had direct personal knowledge of the composition of the Decedent’s immediate family through her marriage to the Decedent.

B. The Snapchat Spotlight Publication of October 21, 2025

14. On October 21, 2025, Defendant published a video to her Snapchat Spotlight account, @lifeofamie (the “Snapchat Publication”), at the following URL: https://www.snapchat.com/@lifeofamie/spotlight/W7_EDIXWTBiXAEEniNoMPwAAYdXVkJmJ0dXRwAZn1nxysAZn1nqC7AAAAAQ. The Snapchat Publication was viewable by, and was communicated to, persons other than Defendant and Plaintiffs.

15. Defendant published the Snapchat Publication to third persons via Snapchat Spotlight, and it was viewable by persons other than Defendant and Plaintiffs, including via the publication URL.

A forensic capture of the Snapchat Publication, an SHA-256 hash of the source file, and a verbatim transcript are preserved and verified under section 92.525, Florida Statutes, and are attached as Exhibit A. Screen captures of the Snapchat Publication, including its on-screen captions and its comment thread, are attached as Exhibit C.

16. The operative defamatory passage of the Snapchat Publication, transcribed verbatim from the source recording (Exhibit A, § III(a)), is set out below. Earlier in the same video Defendant made unrelated introductory remarks, including a reference to having “sold a home”; those remarks are not part of the operative defamatory passage and are identified for context only (Exhibit A, § III, note (d)):

“But imagine that the family of the person that beat the shit out of you is trying to ruin your life. And they know that it’s not going to happen. But at the same time because of that, they’re grasping at everything that they can. That’s what I’ve been dealing with tonight. And it’s fine. I’m used to it. But I cannot wait for the day when it’s over. Hopefully in a couple months.”

17. The Snapchat Publication is recorded and persistent, and it was communicated to third persons. It is therefore libel.

C. Identification of Plaintiffs as the Subject of the Publication

18. The phrase “the family of the person that beat the shit out of you” in the Snapchat Publication identifies a small, ascertainable group of three persons: Gilda Calia, Thomas A. Calia, and Kevin J. Calia. The Snapchat Publication refers to no other persons as “the family.”

19. Audiences familiar with the marriage of Defendant to the Decedent and the publicly knowable composition of the Decedent’s immediate family, including viewers of the publication who follow the account and were aware of the underlying circumstances, would understand the

reference in the Snapchat Publication to identify those three persons and no others. *See Thomas v. Jacksonville Television, Inc.*, 699 So. 2d 800, 803-04 (Fla. 1st DCA 1997); Restatement (Second) of Torts § 564A.

20. In the alternative, and without conceding any element of the identification theory alleged in paragraph 19, the Snapchat Publication is of and concerning each Plaintiff under the intrinsic-reference rule of Florida law: the communication as a whole contains sufficient facts and references from which each Plaintiff may be determined by the persons receiving the communication. *Wolfson v. Kirk*, 273 So. 2d 774, 779 (Fla. 4th DCA 1973); *Jane Doe v. Finkelman*, No. 4D2024-1978 (Fla. 4th DCA Dec. 3, 2025); *Zimmerman v. Buttigieg*, 521 F. Supp. 3d 1197, 1213 (M.D. Fla. 2021).

21. Defendant had direct personal knowledge of the composition of the Decedent's immediate family through her marriage to the Decedent and knew that the reference to "the family" would be understood to refer to Plaintiffs.

22. The Snapchat Publication was viewed by, and drew responsive comments from, persons other than Defendant and Plaintiffs. Viewers of the Snapchat Publication included adult nonparty persons who knew Defendant, knew of Defendant's marriage to the Decedent, and knew that, other than Defendant, the Decedent's immediate surviving family consisted of his mother, Gilda Calia, and his two brothers, Thomas A. Calia and Kevin J. Calia. One or more such viewers, after viewing the Snapchat Publication, understood the reference to "the family of the person that beat the shit out of you" to mean those three Plaintiffs and no other persons, and communicated that understanding to a Plaintiff. The identities of those nonparty viewers are known to Plaintiffs and will be disclosed in discovery. That one or more recipients actually understood the Snapchat

Publication to refer to Plaintiffs, from the facts and references within the communication, establishes that the publication is of and concerning each Plaintiff, or at a minimum presents a question for the jury. *Jane Doe v. Finkelman*, No. 4D2024-1978 (Fla. 4th DCA Dec. 3, 2025); *Thomas v. Jacksonville Television, Inc.*, 699 So. 2d 800, 803-04 (Fla. 1st DCA 1997); Restatement (Second) of Torts § 564A. Each Plaintiff is identifiable as one of the three persons referenced in the Snapchat Publication. The Snapchat Publication is therefore of and concerning each Plaintiff.

D. Falsity of the Publication's Material Statements

23. The material statements in the Snapchat Publication are false as to each Plaintiff.

24. No Plaintiff has engaged in any unlawful or wrongful effort to “ruin” Defendant’s life. No Plaintiff committed, participated in, encouraged, or sympathized with any act of violence against Defendant at any time. The implication conveyed by the Snapchat Publication that any Plaintiff is part of a campaign to harm Defendant, or is complicit in violence against Defendant, is false.

25. As to each Plaintiff, the accusatory sting of the Snapchat Publication materially exceeds any documented record. No record exists of any Plaintiff committing, participating in, encouraging, or sympathizing with any act of violence against Defendant, and no record supports the assertion that any Plaintiff is or has been “trying to ruin” Defendant’s life or “grasping at everything that they can” to that end. The pre-suit notices and preservation demands referenced in this Complaint, including those attached as Composite Exhibit B, were sent in June 2026 and postdate the October 21, 2025 Snapchat Publication by more than seven months; they therefore are not, and cannot be, the conduct to which Defendant referred in stating that the asserted efforts of “the family” were “what I’ve been dealing with tonight.”

26. The narrative of victimization at the hands of the Decedent's family deployed in the Snapchat Publication is contradicted by Defendant's own contemporaneous communications, including statements Defendant published on social media during the period 2020 through 2024, which include affirmative expressions of love, gratitude, and shared life with the Decedent throughout the period.

27. The narrative deployed in the Snapchat Publication emerged in Defendant's communications only after April 2024, and is inconsistent with Defendant's prior contemporaneous representations.

E. Defamatory Meaning

28. The Snapchat Publication imputes to each Plaintiff conduct that subjects each Plaintiff to hatred, contempt, ridicule, distrust, and disgrace, by attributing to the family of the Decedent participation in or sympathy with violence against Defendant and an ongoing effort to "ruin" Defendant's life.

29. The Snapchat Publication is defamatory per se under Florida law, *Richard v. Gray*, 62 So. 2d 597, 598 (Fla. 1953); *Adams v. News-Journal Corp.*, 84 So. 2d 549, 551 (Fla. 1955), because, considered alone and without innuendo, it tends to subject each Plaintiff to hatred, contempt, ridicule, distrust, and disgrace. The Snapchat Publication is independently defamatory because it implies that each Plaintiff is complicit in, sympathetic to, or an extension of violent conduct and is presently engaged in malicious efforts to harm Defendant.

30. The Snapchat Publication further conveys, by the juxtaposition of "the person that beat the shit out of you" with "the family ... trying to ruin your life," the false impression that Plaintiffs

are complicit in, sympathetic to, or extensions of acts of violence against Defendant. That juxtaposition is independently actionable as defamation by implication.

F. Defendant's Negligent Publication

31. Defendant published the Snapchat Publication without reasonable investigation, verification, or basis for the statements made concerning Plaintiffs.

32. A reasonably prudent person in Defendant's circumstances would have known, before publishing the Snapchat Publication, that the statements concerning the family of the Decedent were unsupported and were inconsistent with Defendant's own prior contemporaneous communications. Defendant's publication without that ordinary care constitutes negligence.

33. The applicable fault standard for a private-figure plaintiff suing a private-figure defendant over a statement concerning private parties is negligence. See *Nodar v. Galbreath*, 462 So. 2d 803, 809 (Fla. 1984); *Mile Marker, Inc. v. Petersen Publishing, LLC*, 811 So. 2d 841, 845 (Fla. 4th DCA 2002).

G. Injury and Damages

34. As a direct and proximate result of the Snapchat Publication, each Plaintiff has suffered injury to personal reputation, personal humiliation, and mental anguish, and injury to the standing of each Plaintiff within the communities in which each Plaintiff is known.

35. Damages are presumed as a matter of law because the Snapchat Publication is defamatory per se as to each Plaintiff and Defendant is not a media defendant. See *Lawnwood Medical Center, Inc. v. Sadow*, 43 So. 3d 710, 729 (Fla. 4th DCA 2010). Accord *Copia Blake v.*

Giustibelli, 182 So. 3d 881 (Fla. 4th DCA 2016) (libel per se and presumed damages remain available against a non-media defendant).

36. Plaintiffs reserve all rights to plead and prove special damages and to seek leave of court to amend this Verified Complaint to assert a claim for punitive damages under section 768.72, Florida Statutes, upon a reasonable evidentiary showing.

H. The Nature of This Action

37. This action arises from private speech by a private individual concerning a private family dispute. Although the Snapchat Publication was disseminated as a short-form social-media video, it did not address any governmental proceeding, news event, matter of public policy, or other issue of public concern, and this action is not brought because of any exercise of the right of free speech in connection with a public issue within the meaning of section 768.295, Florida Statutes. This action is brought solely to redress private reputational injury to private individuals.

38. The operative statements in the Snapchat Publication are not pure expressions of opinion and are not rhetorical hyperbole. The publication asserts, as statements of fact concerning actual events (“That’s what I’ve been dealing with tonight”), that the identified family is “trying to ruin” Defendant’s life and is “grasping at everything that they can,” upon a stated factual predicate. By stating “That’s what I’ve been dealing with tonight,” Defendant represented that the identified persons had engaged in actual, contemporaneous conduct directed at Defendant that evening; the Snapchat Publication does not disclose those purported acts and thereby implies the existence of undisclosed defamatory facts showing that Plaintiffs were then “trying to ruin” Defendant’s life and were “grasping at everything that they can.” A speaker cannot invoke the pure-opinion doctrine where the facts underlying the statement are false or are inaccurately

presented, and conversational or casual phrasing does not neutralize factual assertions. *Lipsig v. Ramlawi*, 760 So. 2d 170, 184 (Fla. 3d DCA 2000); *McQueen v. Baskin*, 377 So. 3d 170, 178 (Fla. 2d DCA 2023); *Jane Doe v. Finkelman*, No. 4D2024-1978 (Fla. 4th DCA Dec. 3, 2025); see also *Dresser v. Webb*, No. 3D2024-0056 (Fla. 3d DCA Nov. 5, 2025). See also *Copia Blake v. Giustibelli*, 182 So. 3d 881 (Fla. 4th DCA 2016) (no pure-opinion shelter where the publication rests on false statements of fact).

I. Governing Law

39. The substantive law of Florida governs this action. All three Plaintiffs are domiciled in Florida; Florida is the forum, is the State of Defendant's domicile, and is the State in which Defendant published the Snapchat Publication and engaged in the conduct alleged. Florida therefore bears the most significant relationship to the occurrence and the parties. See *Bishop v. Florida Specialty Paint Co.*, 389 So. 2d 999, 1001 (Fla. 1980).

COUNT I: DEFAMATION PER SE AND, IN THE ALTERNATIVE, DEFAMATION PER QUOD

(All Plaintiffs against Defendant)

40. Plaintiffs reallege and incorporate paragraphs 1 through 39 as though fully set forth herein.

41. Defendant published the Snapchat Publication to third persons via Snapchat Spotlight on October 21, 2025.

42. The Snapchat Publication was of and concerning each Plaintiff.

43. The Snapchat Publication was false as to each Plaintiff in its material statements.

44. The Snapchat Publication is defamatory per se as to each Plaintiff because, considered alone and without innuendo, it imputes to each Plaintiff conduct tending to subject each Plaintiff to hatred, contempt, ridicule, distrust, and disgrace.

45. In the alternative, and without conceding any element of the per se claim, the Snapchat Publication is defamatory per quod as to each Plaintiff because each Plaintiff is identifiable to the audience of the publication when the publication is considered in the context of facts known to that audience, including the marriage of Defendant to the Decedent and the publicly knowable composition of the Decedent's immediate family, and in that event each Plaintiff has suffered actual damages, including injury to reputation, personal humiliation, and mental anguish, in an amount to be proven at trial. *Mac Isaac v. Twitter, Inc.*, 557 F. Supp. 3d 1251, 1265-66 (S.D. Fla. 2021).

46. Defendant published the Snapchat Publication negligently and without reasonable investigation, verification, or basis.

47. As a direct and proximate result of the Snapchat Publication, each Plaintiff has suffered damages in excess of \$50,000.00, with damages presumed as a matter of law on the per se theory because Defendant is not a media defendant, and, in the per quod alternative, actual damages in an amount to be proven at trial.

WHEREFORE, Plaintiffs Thomas A. Calia, Gilda Calia, and Kevin J. Calia, each in his or her individual capacity, demand judgment against Defendant Amie Lynn Calia for compensatory and presumed damages, costs, post-judgment interest, leave to amend to seek punitive damages under section 768.72, Florida Statutes, upon a reasonable evidentiary showing, and all other relief the Court deems just and proper.

COUNT II: DEFAMATION BY IMPLICATION

(All Plaintiffs against Defendant)

48. Plaintiffs reallege and incorporate paragraphs 1 through 39 as though fully set forth herein.

49. Count II is pleaded in the alternative. Even if the literal words of the Snapchat Publication were deemed nonactionable or insufficiently explicit, the Snapchat Publication nevertheless conveys the false and defamatory implication set forth in this Count. The Snapchat Publication juxtaposes the phrase “the person that beat the shit out of you” with the phrase “the family ... trying to ruin your life.”

50. That juxtaposition conveys to the audience of the Snapchat Publication the false impression that Plaintiffs, as the family of the person identified, are complicit in, sympathetic to, or extensions of acts of violence against Defendant.

51. That implication is false. No Plaintiff has at any time committed, participated in, encouraged, or sympathized with any act of violence against Defendant, and no Plaintiff has engaged in any conduct that would make any Plaintiff complicit in, sympathetic to, or an extension of any act of violence against Defendant.

52. Defamation by implication is recognized and independently actionable in Florida. *Jews for Jesus, Inc. v. Rapp*, 997 So. 2d 1098, 1106, 1108 (Fla. 2008); *see also Michael Black, M.D. v. CNN, Inc.*, No. 4D2023-1257 (Fla. 4th DCA Sept. 10, 2025) (statements that are not false can be defamatory when they create a false impression).

53. Defendant published the Snapchat Publication negligently, without reasonable investigation or basis for the implication conveyed by the juxtaposition described above.

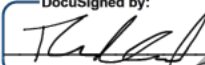
54. As a direct and proximate result of the implication conveyed by the Snapchat Publication, each Plaintiff has suffered damages in excess of \$50,000.00.

WHEREFORE, Plaintiffs Thomas A. Calia, Gilda Calia, and Kevin J. Calia, each in his or her individual capacity, demand judgment against Defendant Amie Lynn Calia for compensatory damages and, to the extent permitted by Florida law upon a finding of defamation per se against a non-media defendant, presumed damages, costs, post-judgment interest, leave to amend to seek punitive damages under section 768.72, Florida Statutes, upon a reasonable evidentiary showing, and all other relief the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs demand trial by jury on all issues so triable as of right.

Respectfully submitted,

DocuSigned by:

6/18/2026
THOMAS A. CALIA, Pro Se Plaintiff
Honolulu, Hawaii
Email for Service: thomascaliamail@gmail.com
Telephone: 808-386-3234

DocuSigned by:

6/19/2026
GILDA CALIA, Pro Se Plaintiff
Lake Worth, Florida
Email for Service: gildajcaliamail@gmail.com
Telephone: 561-377-4973

Signed by:


6/19/2026
KEVIN J. CALIA, Pro Se Plaintiff
Denver, Colorado
Email for Service: kevincaliamail@outlook.com
Telephone: 561-377-5077

VERIFICATION OF THOMAS A. CALIA

STATE OF HAWAII
CITY AND COUNTY OF HONOLULU

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Executed this 18th day of June, 2026.


DocuSigned by:

6/18/2026
9CE01DF934234BC...
THOMAS A. CALIA

VERIFICATION OF GILDA CALIA

STATE OF FLORIDA
COUNTY OF PALM BEACH

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Executed this 19th day of June, 2026.

DocuSigned by:

6/19/2026
66CB2E59F047429...
GILDA CALIA

VERIFICATION OF KEVIN J. CALIA

STATE OF COLORADO
CITY AND COUNTY OF DENVER

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Executed this 19th day of June, 2026.

Signed by:

6/19/2026
17353CC54A6A411...
KEVIN J. CALIA

LIST OF EXHIBITS

Exhibit A: Forensic capture record, verbatim transcript, SHA-256 hash, section 92.525 verification, and supporting foundation facts of the @lifeofamie Snapchat Spotlight publication of October 21, 2025, executed by Thomas A. Calia as custodian and forensic-capture operator.

Composite Exhibit B: The sworn declaration of mailing of Gilda Calia; the June 2, 2026 pre-suit notices of Thomas A. Calia, Gilda Calia, and Kevin J. Calia referencing section 770.01, Florida Statutes; USPS Certified Mail proof of mailing; and United States Postal Service tracking confirmation of delivery.

Exhibit C: Screen captures of the @lifeofamie Snapchat Spotlight publication of October 21, 2025, and its comment thread, showing the operative on-screen captions in sequence; the full native forensic capture is set out in Exhibit A.

NOT A CERTIFIED COPY

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Forensic capture record verbatim transcript SHA-256 hash and section 92.525 verification of the @lifeofamie Snapchat Spotlight publication of October 21 2025.

NOT A CERTIFIED COPY

EXHIBIT A

Operative Publication Package, October 21, 2025 Snapchat Spotlight Publication by @lifeofamie

I. Publication Identification & Forensic-Capture Identifying Data

Publisher: Amie Lynn Calia

Platform: Snapchat, Spotlight (publicly accessible algorithmic feed)

Account handle: @lifeofamie

Publication date: October 21, 2025

URL (authenticated identifier):

[https://www.snapchat.com/@lifeofamie/spotlight/
W7_EDIXWTBiXAEEniNoMPwAAYdXVkJmJ0dXRwAZn1nxysAZn1nqC7AAAAAQ](https://www.snapchat.com/@lifeofamie/spotlight/W7_EDIXWTBiXAEEniNoMPwAAYdXVkJmJ0dXRwAZn1nxysAZn1nqC7AAAAAQ)

Short share URL: <https://snapchat.com/t/bnghspQU> (convenience reference; confirmed resolving to the authenticated URL above as of the capture date, RT-08)

First identified: November 11, 2025 (contemporaneous email from Thomas A. Calia to counsel; preserved)

Forensic capture (date/time): May 16, 2026 at 12:57 ET

Custodian / capture operator: Thomas A. Calia

Source file (native captured medium): 10_Snapchat_Video_RAW.MOV (size 169 MB; produced on request via Google Drive share link in lieu of email attachment due to size)

Recording software: OBS Studio 32.1.2 (64-bit)

Capture device: MacBook Pro (14-inch, 2024), Apple M5, 24 GB RAM (serial C499R352FD), macOS Tahoe 26.3

Capture timestamp source: Network-synced (Apple time-sync server); not local machine clock (RT-07)

SHA-256 of source file at capture:

d105d75be94f26e4138223936543b7437cb3f78db460a93456ab54d829862931

SHA-256 baseline file: 11_Snapchat_MOV_Hash.txt

SHA-256 re-verification: Re-computed May 31, 2026; result identical to baseline above (byte-match verified by _qc_symmetry_check.py)

Wayback Machine snapshot: Submitted 2026-06-01 at 07:23:43 UTC; snapshot URL on its own line below (RT-01 secondary anchor).

[https://web.archive.org/web/20260601072343/https://www.snapchat.com/@lifeofamie/spotlight/
W7_EDIXWTBiXAEEniNoMPwAAYdXVkJmJ0dXRwAZn1nxysAZn1nqC7AAAAAQ](https://web.archive.org/web/20260601072343/https://www.snapchat.com/@lifeofamie/spotlight/W7_EDIXWTBiXAEEniNoMPwAAYdXVkJmJ0dXRwAZn1nxysAZn1nqC7AAAAAQ)

II. Foundation Facts & Chain of Custody

1. The publication identified in Section I was first observed by the undersigned on or about November 11, 2025. Identification was preserved by contemporaneous email from the undersigned to counsel on or about that date, which referenced the @lifeofamie Snapchat Spotlight account, the publication, and its date.
2. On May 16, 2026 at 12:57 ET, the undersigned accessed the URL identified in Section I from a public-network connection on the capture device. The URL returned the same Snapchat Spotlight publication observed on November 11, 2025: the same account handle (@lifeofamie), the same publication date stamp (October 21, 2025), and the same spoken content. The publication's account, posting date, and spoken content were unchanged across the interval between first identification and forensic capture (RT-01).
3. Forensic capture was performed using OBS Studio configured per the standing forensic-capture profile (continuous capture, no edits, full-screen browser window, system audio) and recorded into the file identified in Section I as 10_Snapchat_Video_RAW.MOV. The recording opens with a spoken chain-of-custody preamble in which the undersigned identifies himself as the custodian, states the date and time, recites the

URL, states the purpose of the recording (preservation for litigation), and identifies the recording software, recorded continuously into the same MOV file that was hashed (RT-02).

4. The capture timestamp logged in Section I is sourced from the device's network time-sync service (Apple time-sync server) and not from a local-only machine clock (RT-07).

5. The short share URL listed in Section I was confirmed, at the time of capture, to resolve to the full Snapchat Spotlight URL identified in Section I. The short URL is included as a convenience reference only; the full Spotlight URL is the authenticated identifier (RT-08).

6. As a secondary content-stability anchor, a Wayback Machine snapshot of the URL was submitted on 2026-06-01 at 07:23:43 UTC and is preserved at the URL listed in Section I. The Wayback snapshot is independent of the OBS capture and corroborates that the content at the URL was the content identified in Section I (RT-01).

7. At capture, the SHA-256 hash of 10_Snapchat_Video_RAW.MOV was computed and logged in 11_Snapchat_MOV_Hash.txt as the baseline. At pre-filing QA on May 31, 2026, the undersigned re-computed the SHA-256 of 10_Snapchat_Video_RAW.MOV and obtained the identical hash output recorded in Section I and in the baseline. The hash chain has not changed between capture and pre-filing QA (RT-06).

8. The native captured medium has been preserved in three copies: (a) read-only master on the custodian workstation; (b) working copy in the project repository; (c) off-site backup in Google Drive folder CALIA_CIVIL_SUITE (ID 143UzO4Jmi0vnynqV4p9yMh2LNF-DdNN2). The undersigned has verified that the SHA-256 hash of each copy matches the baseline in Section I.

9. On March 26, 2026, the undersigned testified under oath in a sworn remote deposition (Lexitas Job No. 438740, Volume 1, pages 116-117), with Amie Lynn Calia personally present and with counsel of record for Amie Lynn Calia (Nason, Yeager, Gerson, Harris & Fumero, P.A.) examining the undersigned, regarding the publication identified in Section I. The relevant exchange reads, verbatim from the certified transcript, as set out in the indented block immediately below. This sworn record establishes that Amie Lynn Calia, and her counsel of record, had actual notice of the publication identified in Section I no later than March 26, 2026. The publication remained accessible at the same URL, with the same account handle (@lifeofamie) and the same spoken content, fifty-one (51) days later when the undersigned performed the May 16, 2026 forensic capture documented in this Exhibit A. No retraction was published, and no corrective action was taken, between March 26, 2026 and the May 16, 2026 capture.

Q. That is your interpretation of what's happening?

A. It seems to be the facts. I'm not sure how that's an interpretation. She's -- she -- she's put on Snapchat that we're trying to ruin her life. Which -- that's a very defamatory per se thing that she did.

Q. When did she put that on Snapchat?

A. In October.

Q. Of 2025?

A. Yes.

[...]

Q. So, I'm not going to engage on accusations with respect to the lawyers. So let me ask a different question, you said that there was a statement on Snapchat about -- strike that. I'm going to move to a different topic.

10. The undersigned has personal knowledge of the matters stated in this Section II, performed the capture, computed the original hash, re-verified the hash, and maintains the chain of custody described above.

III. Transcript

Note on completeness and verbatim representation (RT-05, RT-09). The transcript covers the spoken content relevant to the matter at issue beginning at timestamp 01:09. Content preceding 01:09 (00:00–01:08) is non-responsive to the matter. The operative defamatory passage in subsection (a) below is directly transcribed from the source recording and is verbatim. The phrase "Sold a home" (subsection (b), timestamp 01:17–

01:19) is identified by an asterisk and is separately sourced from independent listening and cross-reference to prior contemporaneous reconstruction; it is reproduced for completeness of context and is not part of the defamatory sting.

(a) Directly-transcribed verbatim operative defamatory passage (timestamps 01:24–02:29):

“But imagine that the family of the person that beat the shit out of you is trying to ruin your life. And they know that it’s not going to happen. But at the same time because of that, they’re grasping at everything that they can. That’s what I’ve been dealing with tonight. And it’s fine. I’m used to it. But I cannot wait for the day when it’s over. Hopefully in a couple months.”

(b) Continuous-prose context (with separately-sourced “Sold a home” asterisk):

“So... it’s been crazy. Sold a home. But imagine that the family of the person that beat the shit out of you is trying to ruin your life. And they know that it’s not going to happen. But at the same time because of that, they’re grasping at everything that they can. That’s what I’ve been dealing with tonight. And it’s fine. I’m used to it. But I cannot wait for the day when it’s over. Hopefully in a couple months.”*

(c) Timestamped utterances:

- 01:09–01:14 So... it’s been crazy.
- 01:17–01:19 Sold a home.*
- 01:24–01:45 But imagine that the family of the person that beat the shit out of you is trying to ruin your life.
- 01:49–01:54 And they know that it’s not going to happen.
- 01:54–02:00 But at the same time because of that, they’re grasping at everything that they can.
- 02:06–02:09 That’s what I’ve been dealing with tonight.
- 02:09–02:11 And it’s fine.
- 02:12–02:15 I’m used to it.
- 02:18–02:21 But I cannot wait for the day when it’s over.
- 02:26–02:29 Hopefully in a couple months.

(d) Transcription notes:

- * “Sold a home” is conformed from independent listening and cross-reference to prior contemporaneous reconstruction. It is reproduced for contextual completeness and is not part of the defamatory operative passage in subsection (a).
- Whisper phonetic spellings “Kalia” and “lifeofamy” are corrected to “Calia” and “lifeofamie” based on the known names and the verified account handle in Section I.
- Large-v3 Whisper produced known looping artifacts after the publication ended; repeated tail-end artifacts are excluded.
- The native 10_Snapchat_Video_RAW.MOV controls over any transcript text in this Exhibit A in the event of any discrepancy.

IV. § 92.525 Verification

Under penalties of perjury pursuant to Fla. Stat. § 92.525, I declare that I have read the foregoing Exhibit A and that the facts stated in it are true.

Executed on Tuesday, June 2, 2026.

DocuSigned by:

Thomas Calia

THOMAS A. CALIA, Signature

Printed Name: Thomas A. Calia

Capacity: Custodian and forensic-capture operator

Signature: *Tommy*
Tommy (Jun 3, 2026 19:23:03 HST)

Email: tac006@yahoo.com

X **P S T** **T**

The sworn declaration of mailing of Gilda Calia the June 2 2026 pre-suit notices section 770.01 Fla. Stat. of Thomas A. Calia Gilda Calia and Kevin J. Calia and USPS certified-mail proof of mailing and delivery tracking.

NOT A CERTIFIED COPY

COMPOSITE EXHIBIT B
DECLARATION OF MAILING OF PRE-SUIT NOTICES AND PROOF OF DELIVERY
(Section 92.525, Florida Statutes)

STATE OF FLORIDA
 COUNTY OF PALM BEACH

I, Gilda Calia, state as follows:


1. I am a Plaintiff in this action and have personal knowledge of the facts stated in this declaration.
2. On June 2, 2026, Plaintiffs Thomas A. Calia, Gilda Calia, and Kevin J. Calia each executed a written pre-suit notice under sections 770.01 and 770.02, Florida Statutes, identifying the October 21, 2025 @lifeofamie Snapchat Spotlight publication and the statements alleged to be false and defamatory.
3. On June 3, 2026, I personally deposited with the United States Postal Service, in Palm Beach County, Florida, three certified-mail packages, by Certified Mail, Return Receipt Requested. Each package contained a complete set of all three executed pre-suit notices (those of Thomas A. Calia, Gilda Calia, and Kevin J. Calia), addressed to Defendant Amie Lynn Calia at the three addresses set out below, with a courtesy electronic copy contemporaneously transmitted to Defendant’s counsel of record.
4. Per United States Postal Service records, all three mailings were delivered as set out below:

Address served	USPS Certified Mail Article No.	Delivered
Defendant’s residence, 9788 Boca Gardens Circle North, Apt D, Boca Raton, FL 33496	9589 0710 5270 4229 8102 32	June 5, 2026, 5:13 p.m. (left with individual)
Defendant’s place of business, One Sotheby’s Realty, 200 E. Palmetto Park Rd., Ste. 104, Boca Raton, FL 33432	9589 0710 5270 4229 8102 25	June 5, 2026, 11:56 a.m. (front desk / reception)
Office of Defendant’s counsel of record, Nason Yeager, 3001 PGA Blvd., Ste. 305, Palm Beach Gardens, FL 33410	9589 0710 5270 4229 8102 18	June 8, 2026, 3:35 p.m. (left with individual)

5. Enclosed in this Composite Exhibit B are: (1) the three executed pre-suit notices of Thomas A. Calia, Gilda Calia, and Kevin J. Calia, each dated June 2, 2026, bearing USPS Certified Mail Article Nos. ...8102 18, ...8102 25, and ...8102 32; and (2) United States Postal Service tracking records for those three article numbers, each showing delivery.

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Executed this 19th day of June, 2026.

DocuSigned by:

 6/19/2026
68CB2E59F947429...
GILDA CALIA

Capacity: Plaintiff; person who deposited the pre-suit notices with the U.S. Postal Service

THOMAS A. CALIA

Honolulu, Hawaii

Tuesday, June 2, 2026

VIA USPS CERTIFIED MAIL, RETURN RECEIPT REQUESTED

(operative service)

with courtesy electronic copy to: aspears@nasonyeager.com

Amie Lynn Calia

9788 Boca Gardens Circle North, Apartment D

Boca Raton, Florida 33496

**Re: Fla. Stat. § 770.01 pre-suit notice and § 770.02 retraction option, October 21, 2025
Snapchat Spotlight Publication**

Amie,

This letter is a statutory pre-suit notice under Fla. Stat. § 770.01 and identifies the retraction option provided by Fla. Stat. § 770.02. I send it solely in my personal individual capacity as a brother of Christopher S. Calia. No fiduciary, representative, or estate-related claim is asserted by this notice. The action contemplated by this notice is not brought on behalf of any estate and is not brought in any capacity other than my own individual capacity.

On October 21, 2025, you published a video to your publicly accessible Snapchat Spotlight account, @lifeofamie, at the following URL:

<https://www.snapchat.com/@lifeofamie/spotlight/>

W7_EDIXWTBiXAEEniNoMPwAAydxVkJmJ0dXRwAZn1nxysAZn1nqC7AAAAAQ

A forensic capture and verified transcript are preserved separately and are attached as Exhibit A.

The statements I allege to be false and defamatory are:

“So... it’s been crazy. Sold a home. But imagine that the family of the person that beat the shit out of you is trying to ruin your life. And they know that it’s not going to happen. But at the same time because of that, they’re grasping at everything that they can. That’s what I’ve been dealing with tonight. And it’s fine. I’m used to it. But I cannot wait for the day when it’s over. Hopefully in a couple months.”*

* The phrase “Sold a home” is reproduced above for completeness of context. It is separately sourced from independent listening and cross-reference, as set out in Exhibit A, Section III, note (d), and is not part of the operative defamatory passage. The operative defamatory language is the portion beginning “But imagine that the family of the person...” through the close of the publication.

The reference to “the family of the person that beat the shit out of you” identifies a small, ascertainable group of three persons: Gilda Calia, Thomas A. Calia, and Kevin J. Calia. Christopher S.

Calia was your husband, and his immediate family is publicly knowable as consisting of his mother and his two brothers. I am Thomas A. Calia, a brother of Christopher. Persons familiar with Christopher and his marriage would understand the statement to refer to me as one of three immediate family members of Christopher S. Calia, including viewers of the publication who follow the account and were aware of the underlying circumstances.

The statements are false as to me. I have not engaged in any conduct designed to “ruin” your life. The conduct the publication characterizes as malicious persecution consists of nothing more than lawful conduct undertaken in good faith and in accordance with Florida law. The publication’s predicate characterization, that I am a member of the family of “the person that beat the shit out of” you, materially exceeds the documented record, which reflects a single mutual-conflict incident resolved as a single misdemeanor battery disposition (defensive or evasive push; no documented injury) and no prior charges, investigations, or allegations of the kind the publication implies.

Fla. Stat. § 770.02 (retraction option, 10 days from receipt). Florida Statute § 770.02 provides that, within ten (10) days after your receipt of this letter, you may publish a full and fair correction or retraction in the same medium (the @lifeofamie Snapchat Spotlight account), in substantially as conspicuous a manner as the original publication, and continuously accessible for thirty (30) days thereafter. To be compliant as to me, the retraction must name Thomas A. Calia by full legal name and substantially state that the prior publication’s implication, that Thomas A. Calia has been engaged in efforts to ruin your life, was false and unsupported. A retraction that does not name me by full legal name does not limit recovery as to me, and a non-compliant or partial retraction preserves all claims as to me in full.

Fla. Stat. § 770.01 (pre-suit notice period, 5 days from receipt). The five-day pre-suit notice period under Fla. Stat. § 770.01 begins upon your receipt of this letter and is measured independently of the § 770.02 retraction window. If no compliant retraction is published within the period specified by Fla. Stat. § 770.02, suit may be filed once the Fla. Stat. § 770.01 notice period has also expired, in the Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida, Civil Division.

Service-date quarantine. Service for purposes of Fla. Stat. § 770.01 and § 770.02 is by USPS Certified Mail, Return Receipt Requested. The courtesy electronic copy is provided as a professional notification and is not separate statutory service; it does not alter the receipt date, which is measured solely from USPS delivery of the Certified Mail envelope.

Evidence preservation demand. Florida law imposes a duty to preserve relevant evidence once litigation is reasonably foreseeable. Litigation is reasonably foreseeable upon your receipt of this letter. You are directed to preserve, in unaltered form, the following categories of electronically stored information and tangible items, including all associated metadata:

- (a) the original video file of the October 21, 2025 Snapchat Spotlight publication, in its native format and at native resolution, including all embedded metadata;
- (b) all drafts, outtakes, alternate takes, edits, and prior versions of that publication, on any device or platform;

- (c) the full contents of the @lifeofamie Snapchat account and the @lifeofamielynn TikTok account, including posted content, stories, drafts, direct messages, account settings history, and login history;
- (d) all devices used to create, edit, store, or publish the publication or its precursors, including mobile devices, tablets, laptops, desktops, and any external storage;
- (e) all cloud backups (iCloud, Google, Snapchat servers, TikTok servers, third-party cloud storage) containing or referring to the publication or its precursors;
- (f) all engagement data associated with the publication, including views, likes, comments, shares, replies, and direct messages received in response;
- (g) all communications referring to the creation, drafting, publication, distribution, defense, or removal of the publication, including text messages, email, direct messages, voice memos, and recorded calls (excluding attorney-client privileged communications, which must nevertheless be preserved and logged for privilege assertion).

This letter is sent without prejudice and without waiver of any right, remedy, claim, or defense. The claimants and their representatives have preserved, and continue to preserve, contemporaneous records of conduct related to the publication identified above, which may be relied upon in any further proceedings if a compliant Fla. Stat. § 770.02 retraction is not published within the period that section specifies. All rights, remedies, claims, and defenses are reserved. All objections preserved.

Respectfully,

DocuSigned by:

Thomas Calia

5D1C1D10ADCE483...

THOMAS A. CALIA, individually

Brother of Christopher S. Calia

Date executed: Tuesday, June 2, 2026

USPS Certified Mail Article No.: 9589071052704229810218, 9589071052704229810225, and 9589071052704229810232

Encl.: Exhibit A. Operative publication package: verified transcript of the October 21, 2025 @lifeofamie Snapchat Spotlight publication; URL; SHA-256 hash; § 92.525 verification and chain of custody.

GILDA CALIA

4264 Hunting Trail, Lake Worth, Florida 33467

Tuesday, June 2, 2026

VIA USPS CERTIFIED MAIL, RETURN RECEIPT REQUESTED

(operative service)

with courtesy electronic copy to: aspears@nasonyeager.com

Amie Lynn Calia
9788 Boca Gardens Circle North, Apartment D
Boca Raton, Florida 33496

**Re: Fla. Stat. § 770.01 pre-suit notice and § 770.02 retraction option, October 21, 2025
Snapchat Spotlight Publication**

Amie,

This letter is a statutory pre-suit notice under Fla. Stat. § 770.01 and identifies the retraction option provided by Fla. Stat. § 770.02. I send it solely in my personal individual capacity as the mother of Christopher S. Calia. No fiduciary, representative, or estate-related claim is asserted by this notice. The action contemplated by this notice is not brought on behalf of any estate and is not brought in any capacity other than my own individual capacity.

On October 21, 2025, you published a video to your publicly accessible Snapchat Spotlight account, @lifeofamie, at the following URL:

[https://www.snapchat.com/@lifeofamie/spotlight/
W7_EDIXWTBiXAEEniNoMPwAAydxVkJmJ0dXRwAZn1nxysAZn1nqC7AAAAAQ](https://www.snapchat.com/@lifeofamie/spotlight/W7_EDIXWTBiXAEEniNoMPwAAydxVkJmJ0dXRwAZn1nxysAZn1nqC7AAAAAQ)

A forensic capture and verified transcript are preserved separately and are attached as Exhibit A.

The statements I allege to be false and defamatory are:

“So... it’s been crazy. Sold a home. But imagine that the family of the person that beat the shit out of you is trying to ruin your life. And they know that it’s not going to happen. But at the same time because of that, they’re grasping at everything that they can. That’s what I’ve been dealing with tonight. And it’s fine. I’m used to it. But I cannot wait for the day when it’s over. Hopefully in a couple months.”*

* The phrase “Sold a home” is reproduced above for completeness of context. It is separately sourced from independent listening and cross-reference, as set out in Exhibit A, Section III, note (d), and is not part of the operative defamatory passage. The operative defamatory language is the portion beginning “But imagine that the family of the person...” through the close of the publication.

The reference to “the family of the person that beat the shit out of you” identifies a small, ascertainable group of three persons: Gilda Calia, Thomas A. Calia, and Kevin J. Calia. Christopher S.

Calia was your husband, and his immediate family is publicly knowable as consisting of his mother and his two brothers. I am Gilda Calia, the mother of Christopher. Persons familiar with Christopher and his marriage would understand the statement to refer to me as one of three immediate family members of Christopher S. Calia, including viewers of the publication who follow the account and were aware of the underlying circumstances.

The statements are false as to me. My family has not engaged in any conduct designed to “ruin” your life. The conduct the publication characterizes as malicious persecution consists of nothing more than lawful conduct undertaken in good faith and in accordance with Florida law. The publication’s predicate characterization, that I am a member of the family of “the person that beat the shit out of” you, materially exceeds the documented record, which reflects a single mutual-conflict incident resolved as a single misdemeanor battery disposition (defensive or evasive push; no documented injury) and no prior charges, investigations, or allegations of the kind the publication implies.

Fla. Stat. § 770.02 (retraction option, 10 days from receipt). Florida Statute § 770.02 provides that, within ten (10) days after your receipt of this letter, you may publish a full and fair correction or retraction in the same medium (the @lifeofamie Snapchat Spotlight account), in substantially as conspicuous a manner as the original publication, and continuously accessible for thirty (30) days thereafter. To be compliant as to me, the retraction must name Gilda Calia by full legal name and substantially state that the prior publication’s implication, that Gilda Calia has been engaged in efforts to ruin your life, was false and unsupported. A retraction that does not name me by full legal name does not limit recovery as to me, and a non-compliant or partial retraction preserves all claims as to me in full.

Fla. Stat. § 770.01 (pre-suit notice period, 5 days from receipt). The five-day pre-suit notice period under Fla. Stat. § 770.01 begins upon your receipt of this letter and is measured independently of the § 770.02 retraction window. If no compliant retraction is published within the period specified by Fla. Stat. § 770.02, suit may be filed once the Fla. Stat. § 770.01 notice period has also expired, in the Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida, Civil Division.

Service-date quarantine. Service for purposes of Fla. Stat. § 770.01 and § 770.02 is by USPS Certified Mail, Return Receipt Requested. The courtesy electronic copy is provided as a professional notification and is not separate statutory service; it does not alter the receipt date, which is measured solely from USPS delivery of the Certified Mail envelope.

Evidence preservation demand. Florida law imposes a duty to preserve relevant evidence once litigation is reasonably foreseeable. Litigation is reasonably foreseeable upon your receipt of this letter. You are directed to preserve, in unaltered form, the following categories of electronically stored information and tangible items, including all associated metadata:

- (a) the original video file of the October 21, 2025 Snapchat Spotlight publication, in its native format and at native resolution, including all embedded metadata;
- (b) all drafts, outtakes, alternate takes, edits, and prior versions of that publication, on any device or platform;

- (c) the full contents of the @lifeofamie Snapchat account and the @lifeofamielynn TikTok account, including posted content, stories, drafts, direct messages, account settings history, and login history;
- (d) all devices used to create, edit, store, or publish the publication or its precursors, including mobile devices, tablets, laptops, desktops, and any external storage;
- (e) all cloud backups (iCloud, Google, Snapchat servers, TikTok servers, third-party cloud storage) containing or referring to the publication or its precursors;
- (f) all engagement data associated with the publication, including views, likes, comments, shares, replies, and direct messages received in response;
- (g) all communications referring to the creation, drafting, publication, distribution, defense, or removal of the publication, including text messages, email, direct messages, voice memos, and recorded calls (excluding attorney-client privileged communications, which must nevertheless be preserved and logged for privilege assertion).

This letter is sent without prejudice and without waiver of any right, remedy, claim, or defense. The claimants and their representatives have preserved, and continue to preserve, contemporaneous records of conduct related to the publication identified above, which may be relied upon in any further proceedings if a compliant Fla. Stat. § 770.02 retraction is not published within the period that section specifies. All rights, remedies, claims, and defenses are reserved. All objections preserved.

Respectfully,

DocuSigned by:

66CB2E59F947429...
GILDA CALIA, individually

Mother of Christopher S. Calia

Date executed: Tuesday, June 2, 2026

USPS Certified Mail Article No.: 9589071052704229810218, 9589071052704229810225, and 9589071052704229810232

Encl.: Exhibit A. Operative publication package: verified transcript of the October 21, 2025 @lifeofamie Snapchat Spotlight publication; URL; SHA-256 hash; § 92.525 verification and chain of custody.

KEVIN J. CALIA

Denver, Colorado

Tuesday, June 2, 2026

VIA USPS CERTIFIED MAIL, RETURN RECEIPT REQUESTED

(operative service)

with courtesy electronic copy to: aspears@nasonyeager.com

Amie Lynn Calia

9788 Boca Gardens Circle North, Apartment D

Boca Raton, Florida 33496

**Re: Fla. Stat. § 770.01 pre-suit notice and § 770.02 retraction option, October 21, 2025
Snapchat Spotlight Publication**

Amie,

This letter is a statutory pre-suit notice under Fla. Stat. § 770.01 and identifies the retraction option provided by Fla. Stat. § 770.02. I send it solely in my personal individual capacity as a brother of Christopher S. Calia. No fiduciary, representative, or estate-related claim is asserted by this notice. The action contemplated by this notice is not brought on behalf of any estate and is not brought in any capacity other than my own individual capacity.

On October 21, 2025, you published a video to your publicly accessible Snapchat Spotlight account, @lifeofamie, at the following URL:

<https://www.snapchat.com/@lifeofamie/spotlight/>

W7_EDIXWTBiXAEEniNoMPwAAydxVkJmJ0dXRwAZn1nxysAZn1nqC7AAAAAQ

A forensic capture and verified transcript are preserved separately and are attached as Exhibit A.

The statements I allege to be false and defamatory are:

"So... it's been crazy. Sold a home. But imagine that the family of the person that beat the shit out of you is trying to ruin your life. And they know that it's not going to happen. But at the same time because of that, they're grasping at everything that they can. That's what I've been dealing with tonight. And it's fine. I'm used to it. But I cannot wait for the day when it's over. Hopefully in a couple months."*

* The phrase "Sold a home" is reproduced above for completeness of context. It is separately sourced from independent listening and cross-reference, as set out in Exhibit A, Section III, note (d), and is not part of the operative defamatory passage. The operative defamatory language is the portion beginning "But imagine that the family of the person..." through the close of the publication.

The reference to "the family of the person that beat the shit out of you" identifies a small, ascertainable group of three persons: Gilda Calia, Thomas A. Calia, and Kevin J. Calia. Christopher S.

Calia was your husband, and his immediate family is publicly knowable as consisting of his mother and his two brothers. I am Kevin J. Calia, a brother of Christopher. Persons familiar with Christopher and his marriage would understand the statement to refer to me as one of three immediate family members of Christopher S. Calia, including viewers of the publication who follow the account and were aware of the underlying circumstances.

The statements are false as to me. I have not engaged in any conduct designed to “ruin” your life. The publication’s predicate characterization, that I am a member of the family of “the person that beat the shit out of” you, materially exceeds the documented record, which reflects a single mutual-conflict incident resolved as a single misdemeanor battery disposition (defensive or evasive push; no documented injury) and no prior charges, investigations, or allegations of the kind the publication implies.

Fla. Stat. § 770.02 (retraction option, 10 days from receipt). Florida Statute § 770.02 provides that, within ten (10) days after your receipt of this letter, you may publish a full and fair correction or retraction in the same medium (the @lifeofamie Snapchat Spotlight account), in substantially as conspicuous a manner as the original publication, and continuously accessible for thirty (30) days thereafter. To be compliant as to me, the retraction must name Kevin J. Calia by full legal name and substantially state that the prior publication’s implication, that Kevin J. Calia has been engaged in efforts to ruin your life, was false and unsupported. A retraction that does not name me by full legal name does not limit recovery as to me, and a non-compliant or partial retraction preserves all claims as to me in full.

Fla. Stat. § 770.01 (pre-suit notice period, 5 days from receipt). The five-day pre-suit notice period under Fla. Stat. § 770.01 begins upon your receipt of this letter and is measured independently of the § 770.02 retraction window. If no compliant retraction is published within the period specified by Fla. Stat. § 770.02, suit may be filed once the Fla. Stat. § 770.01 notice period has also expired, in the Circuit Court of the Fifteenth Judicial Circuit, in and for Palm Beach County, Florida, Civil Division.

Service-date quarantine. Service for purposes of Fla. Stat. § 770.01 and § 770.02 is by USPS Certified Mail, Return Receipt Requested. The courtesy electronic copy is provided as a professional notification and is not separate statutory service; it does not alter the receipt date, which is measured solely from USPS delivery of the Certified Mail envelope.

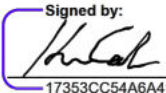
Evidence preservation demand. Florida law imposes a duty to preserve relevant evidence once litigation is reasonably foreseeable. Litigation is reasonably foreseeable upon your receipt of this letter. You are directed to preserve, in unaltered form, the following categories of electronically stored information and tangible items, including all associated metadata:

- (a) the original video file of the October 21, 2025 Snapchat Spotlight publication, in its native format and at native resolution, including all embedded metadata;
- (b) all drafts, outtakes, alternate takes, edits, and prior versions of that publication, on any device or platform;

- (c) the full contents of the @lifeofamie Snapchat account and the @lifeofamielynn TikTok account, including posted content, stories, drafts, direct messages, account settings history, and login history;
- (d) all devices used to create, edit, store, or publish the publication or its precursors, including mobile devices, tablets, laptops, desktops, and any external storage;
- (e) all cloud backups (iCloud, Google, Snapchat servers, TikTok servers, third-party cloud storage) containing or referring to the publication or its precursors;
- (f) all engagement data associated with the publication, including views, likes, comments, shares, replies, and direct messages received in response;
- (g) all communications referring to the creation, drafting, publication, distribution, defense, or removal of the publication, including text messages, email, direct messages, voice memos, and recorded calls (excluding attorney-client privileged communications, which must nevertheless be preserved and logged for privilege assertion).

This letter is sent without prejudice and without waiver of any right, remedy, claim, or defense. The claimants and their representatives have preserved, and continue to preserve, contemporaneous records of conduct related to the publication identified above, which may be relied upon in any further proceedings if a compliant Fla. Stat. § 770.02 retraction is not published within the period that section specifies. All rights, remedies, claims, and defenses are reserved. All objections preserved.

Respectfully,

Signed by:

17353CC54A6A411...

KEVIN J. CALIA, individually

Brother of Christopher S. Calia

Date executed: Tuesday, June 2, 2026

USPS Certified Mail Article No.: 9589071052704229810218, 9589071052704229810225, and 9589071052704229810232

Encl.: Exhibit A. Operative publication package: verified transcript of the October 21, 2025 @lifeofamie Snapchat Spotlight publication; URL; SHA-256 hash; § 92.525 verification and chain of custody.

Track Packages
Anytime, Anywhere

Get the free Informed Delivery® feature to receive automated notifications on your packages

[Learn More](#)

Tracking Number:

9589071052704229810218

[Copy](#)

[Add to Informed Delivery](#)

[Remove X](#)

Latest Update

Your item was delivered to an individual at the address at 3:35 pm on June 8, 2026 in PALM BEACH GARDENS, FL 33410.

Get More Out of USPS Tracking:
USPS Tracking Plus®

- Delivered**
Delivered, Left with Individual
PALM BEACH GARDENS, FL 33410
June 8, 2026 3:35 PM
- Out for Delivery**
PALM BEACH GARDENS, FL 33410
June 6, 2026 6:10 AM
- Arrived at Post Office**
WEST PALM BEACH, FL 33411
June 5, 2026 10:11 AM
- Arrived at USPS Facility**
WEST PALM BEACH FL DISTRIBUTION CENTER
June 4, 2026 9:21 AM
- Departed Post Office**
WEST PALM BEACH, FL 33411
June 3, 2026 6:27 PM
- USPS in possession of item**
WEST PALM BEACH, FL 33411
June 3, 2026 10:39 AM
- Hide Tracking History**

[What Do USPS Tracking Statuses Mean?](#)

[Text & Email Updates](#) 

[USPS Tracking Plus®](#) 

[Product Information](#) 

[See Less ^](#)

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

Track Packages
Anytime, Anywhere

Get the free Informed Delivery® feature to receive automated notifications on your packages

[Learn More](#)

Tracking Number:

9589071052704229810225

[Copy](#)

[Add to Informed Delivery](#)

[Remove X](#)

Latest Update

Your item was delivered to the front desk, reception area, or mail room at 11:56 am on June 5, 2026 in BOCA RATON, FL 33432.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Front Desk/Reception/Mail Room

BOCA RATON, FL 33432
June 5, 2026 11:56 AM

Arrived at USPS Facility

WEST PALM BEACH FL DISTRIBUTION CENTER
June 4, 2026 9:21 AM

Departed Post Office

WEST PALM BEACH, FL 33411
June 3, 2026 6:27 PM

USPS in possession of item

WEST PALM BEACH, FL 33411
June 3, 2026 10:38 AM

Hide Tracking History

[What Do USPS Tracking Statuses Mean?](#)

[Text & Email Updates](#)



[USPS Tracking Plus®](#)



[Product Information](#)



[See Less ^](#)

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

**Track Packages
Anytime, Anywhere**

Get the free Informed Delivery® feature to receive automated notifications on your packages

[Learn More](#)

Tracking Number:

9589071052704229810232

[Copy](#)

[Add to Informed Delivery](#)

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Latest Update

Your item was delivered to an individual at the address at 5:13 pm on June 5, 2026 in BOCA RATON, FL 33496.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, Left with Individual

BOCA RATON, FL 33496
June 5, 2026 5:13 PM

Arrived at USPS Facility

WEST PALM BEACH FL DISTRIBUTION CENTER
June 4, 2026 9:21 AM

Departed Post Office

WEST PALM BEACH, FL 33411
June 3, 2026 6:27 PM

USPS in possession of item

WEST PALM BEACH, FL 33411
June 3, 2026 10:36 AM

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Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

[FAQs](#)

X T

Screen captures of the @lifeofamie Snapchat Spotlight publication of October 21 2025 and its comment thread in caption sequence. Full native forensic capture at Exhibit A.

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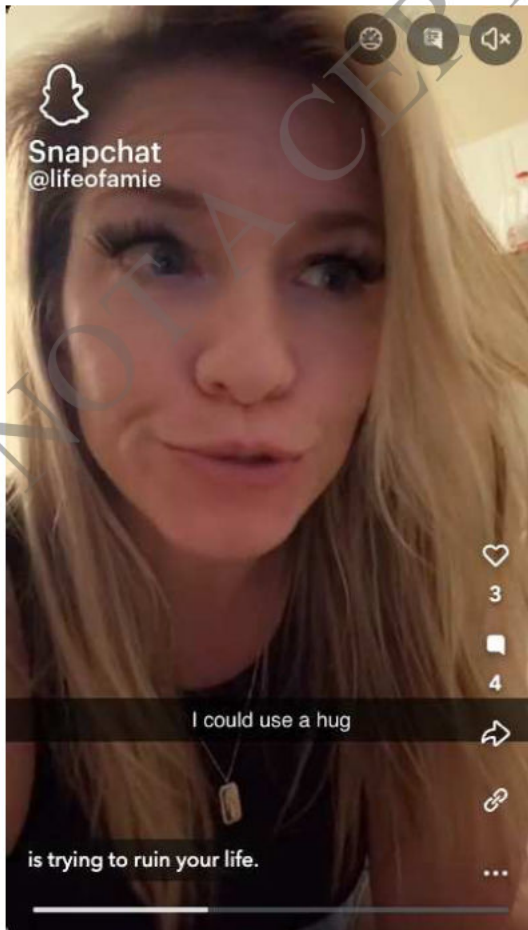


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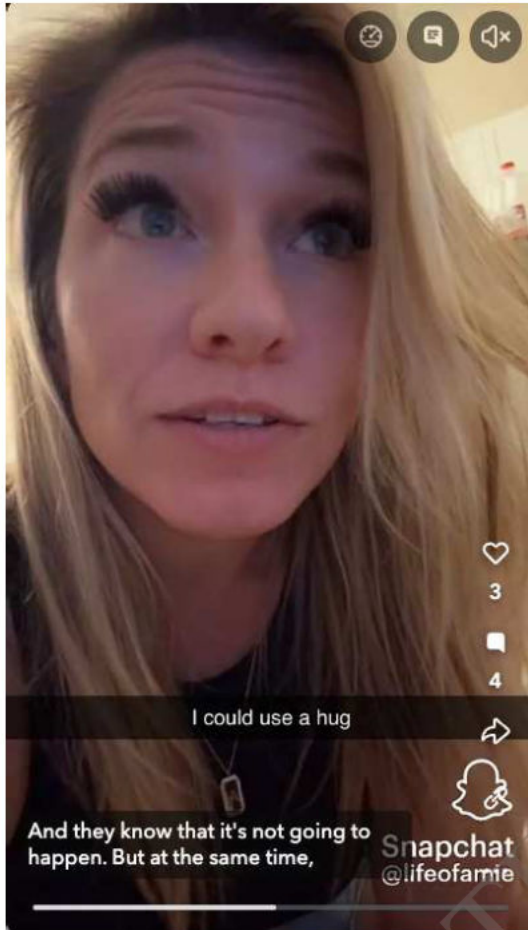


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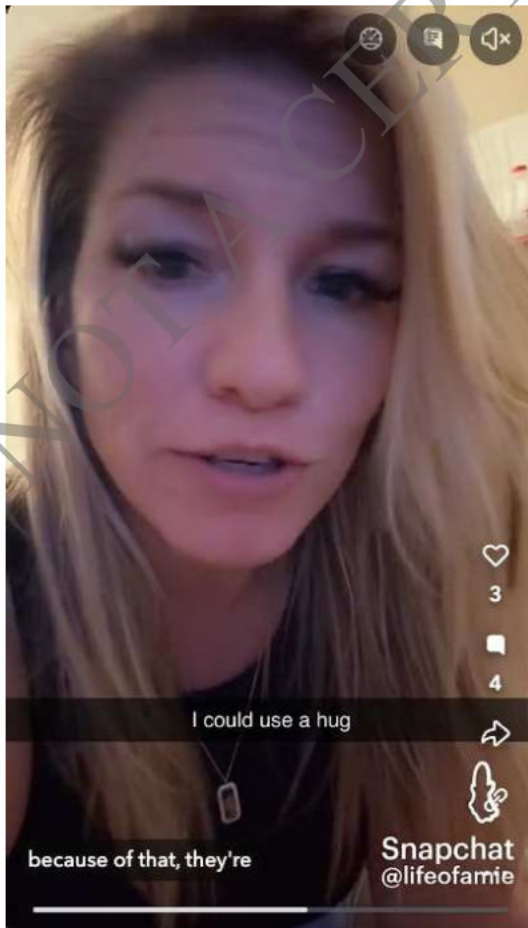
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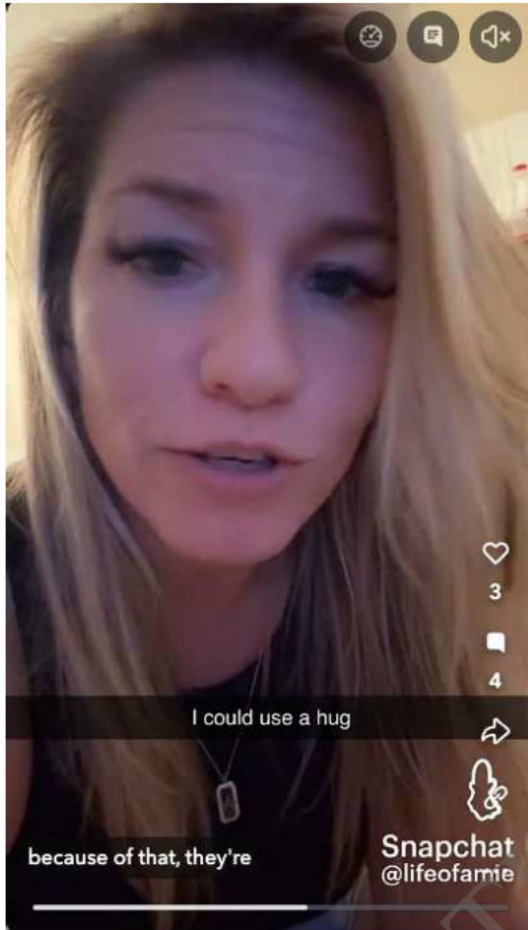
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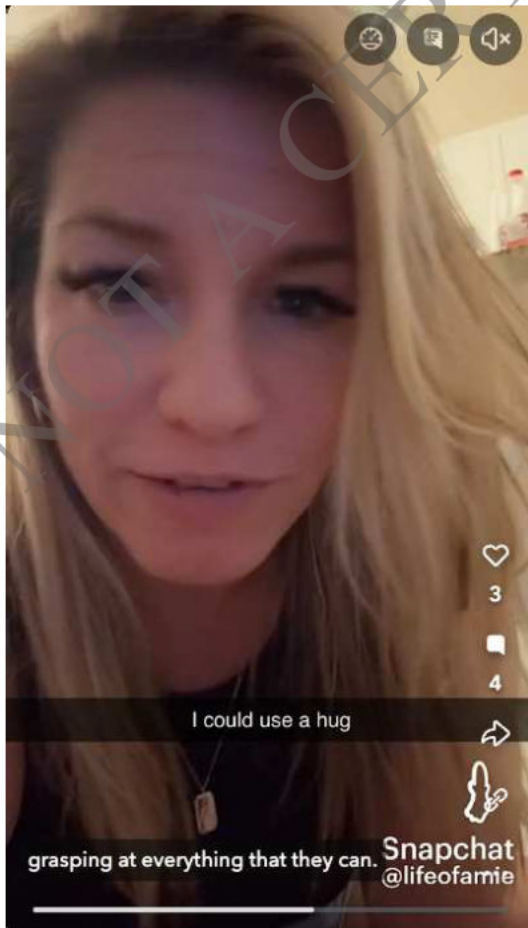
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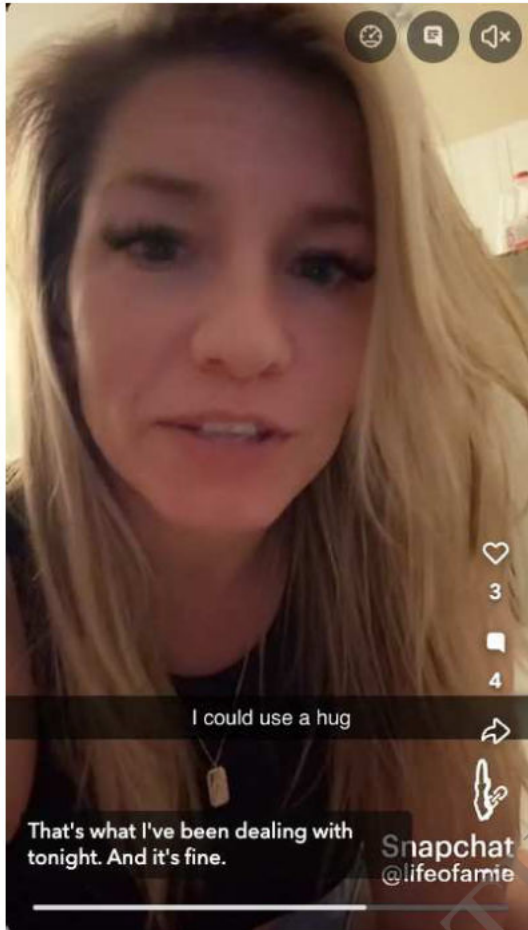
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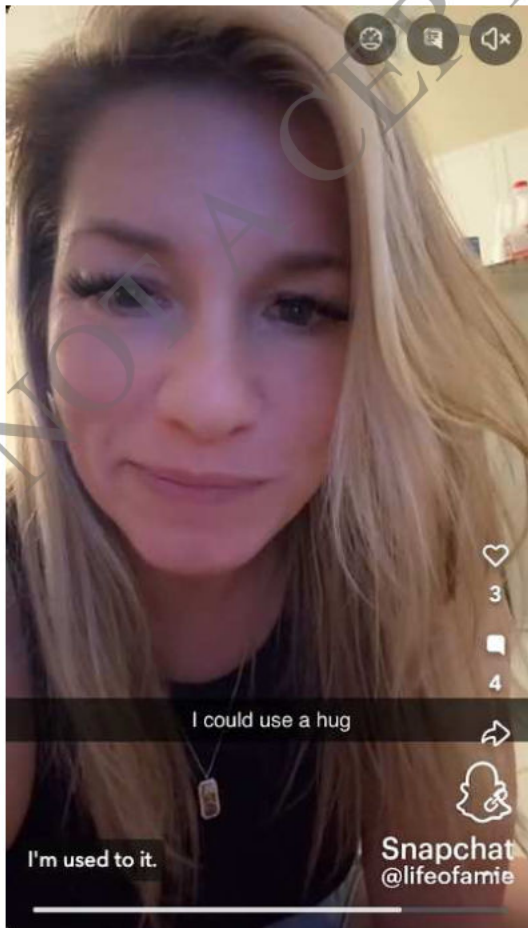
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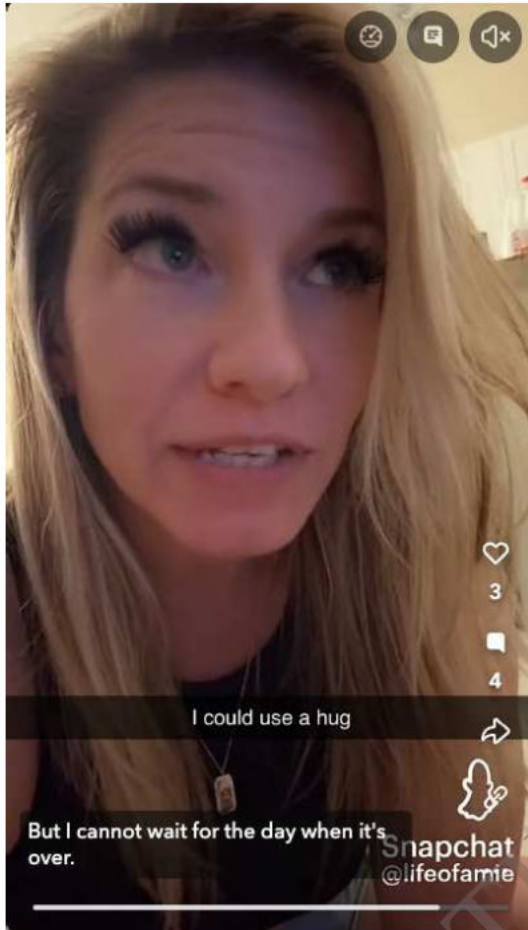
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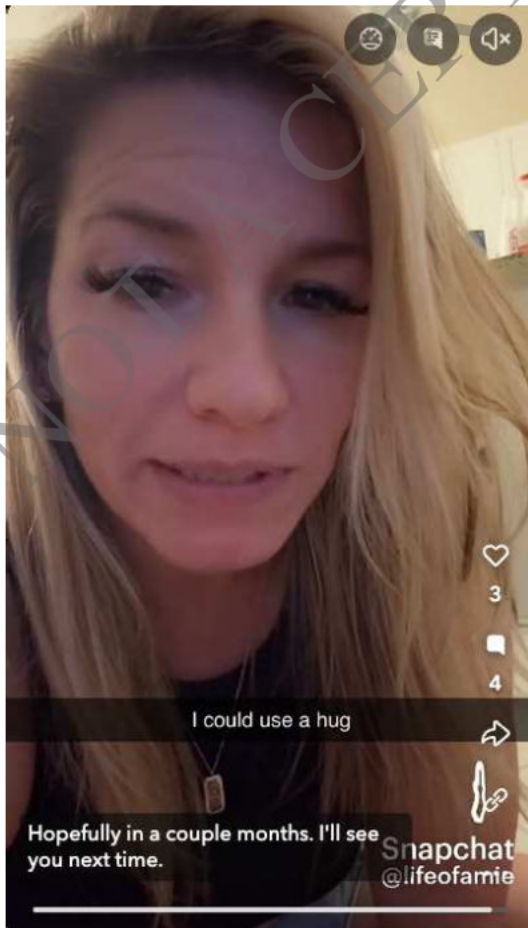
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Certificate Of Completion

Envelope Id: 0520E7B3-8680-8C60-806D-127AF3AD30E6
 Subject: Complete with Docusign: Defamation Lawsuit (TAC GC KJC vs ALC).pdf
 Source Envelope:
 Document Pages: 40
 Certificate Pages: 2
 AutoNav: Enabled
 Envelopeld Stamping: Enabled
 Time Zone: (UTC-08:00) Pacific Time (US & Canada)

Status: Completed
 Envelope Originator:
 Thomas Calia
 thomascalia@gmail.com
 IP Address: 147.81.112.226

Record Tracking

Status: Original
 6/18/2026 9:06:50 PM

Holder: Thomas Calia
 thomascalia@gmail.com

Location: DocuSign

Signer Events

Gilda Calia
 GildaJCalia@gmail.com
 Security Level: Email, Account Authentication
 (None)

Signature

DocuSigned by:

 66CB2E59F947429...
 Signature Adoption: Pre-selected Style
 Using IP Address:
 2601:58b:1200:5580:907c:1987:62c3:b4d4

Timestamp

Sent: 6/18/2026 9:58:26 PM
 Resent: 6/18/2026 10:01:45 PM
 Viewed: 6/19/2026 3:30:11 AM
 Signed: 6/19/2026 8:02:03 AM

Electronic Record and Signature Disclosure:
 Not Offered via Docusign

Kevin Calia
 KevinCalia@outlook.com
 Security Level: Email, Account Authentication
 (None)

Signed by:

 17353CC54A8A411...
 Signature Adoption: Pre-selected Style
 Using IP Address: 75.166.164.230

Sent: 6/18/2026 9:58:26 PM
 Resent: 6/18/2026 10:01:46 PM
 Viewed: 6/19/2026 11:40:30 AM
 Signed: 6/19/2026 11:41:38 AM

Electronic Record and Signature Disclosure:
 Not Offered via Docusign

THOMAS A CALIA
 thomascalia@gmail.com
 Security Level: Email, Account Authentication
 (None)

DocuSigned by:

 9CE01DF934234BC...
 Signature Adoption: Drawn on Device
 Using IP Address: 147.81.112.226

Sent: 6/18/2026 9:58:27 PM
 Viewed: 6/18/2026 9:58:48 PM
 Signed: 6/18/2026 10:01:21 PM

Electronic Record and Signature Disclosure:
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In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp

Witness Events	Signature	Timestamp
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Notary Events	Signature	Timestamp
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Envelope Summary Events	Status	Timestamps
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Envelope Sent	Hashed/Encrypted	6/18/2026 9:58:27 PM
Certified Delivered	Security Checked	6/18/2026 9:58:48 PM
Signing Complete	Security Checked	6/18/2026 10:01:21 PM
Completed	Security Checked	6/19/2026 11:41:38 AM

Payment Events	Status	Timestamps
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