

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

CASE NO.

MICHAEL CIPRIANNI,
an individual

Plaintiff,

vs.

CHARLES GORDON SINN,
an individual;

Defendant.

COMPLAINT

COMES NOW Plaintiff, MICHAEL CIPRIANNI (“Plaintiff”) by and through undersigned counsel, hereby sue Defendant CHARLES GORDON SINN, (“Defendant”) and allege as follows:

PARTIES, VENUE AND JURISDICTION

1. This is an action to recover money damages and other relief in excess of fifty thousand Dollars (\$50,001.00) exclusive of interest, costs, and attorney’s fees.
2. Plaintiff, MICHAEL CIPRIANNI, an individual, is a resident of the State of Florida.
3. Defendant is an individual and upon information and belief resides in the country Malta.
4. Venue is proper in Palm Beach County, Florida as the causes of action arise and accrued in Palm Beach County, Florida and Plaintiff continues to suffer damages here in Palm Beach County, Florida.

GENERAL ALLEGATIONS

5. On or about December 5, 2025, Defendant shared a post on www.Instagram.com containing intentionally and knowingly false information about Plaintiff. *See Instagram Post attached hereto as Exhibit 1.*

6. Specifically, the post contains false statements about Plaintiff, attempting to accuse Plaintiff of rape and human trafficking. *See id.*

7. Plaintiff owns and operates a small business teaching and coaching jiu-jitsu and kickboxing to students, including children of all ages.

8. The false allegations posted and shared by Defendant are completely baseless and are merely an effort to injure Plaintiff and his reputation.

9. The statements are available to third-parties and have been viewed approximately 1,598 times since their publication. Moreover, there is ongoing communication between Defendant and third-parties regarding these statements, as evidenced by numerous likes and comments on Defendant's post. *See Screenshot of Defendant's Instagram attached hereto as Exhibit 2.*

10. In fact, Plaintiff only became aware of these false allegations against him by accessing Defendant's post himself.

11. Thereafter, Plaintiff sent a cease-and-desist letter directly to Defendant demonstrating the statements he was making were false and requesting his immediate retraction and correction of the intentional false statements.

12. Defendant did not respond to the cease-and-desist letter and also failed to remedy the false statements, resulting in ongoing harm to the Plaintiff as a result of Defendant's false and malicious statements.

COUNT I **DEFAMATION**

13. Plaintiff adopts and incorporates the allegations of paragraphs 1 through 12 above as if fully set forth herein.

14. Defendant knowingly and intentionally published written statements about Plaintiff on the internet, including but not limited to www.Instagram.com and other social media platforms.

Exhibit A.

15. These statements were all posted with malice and the intention of harming Plaintiff and were not personal opinions. Specifically, Defendant asserted that Plaintiff is a rapist and human trafficker.

16. These statements were all available to third-parties and in fact read by third-parties which is evidenced by the ongoing communication and commenting made by third-parties and Defendant. In fact, the post on which these statements were made has accrued 1,598 views at the time of this Complaint. *See Exhibit 2.*

17. These statements were knowingly false and were intentionally published or were published with reckless disregard.

18. As a direct result of Defendant's unlawful actions, Plaintiff has suffered direct harm, including reputational harm to Plaintiff and Plaintiff's family.

19. Defendant has continued to publicly post and defame Plaintiff and as such Plaintiff continues to suffer harm.

COUNT II
DEFAMATION PER SE

20. Plaintiffs adopt and incorporate the allegations of paragraphs 1 through 12 above as if fully set forth herein.

21. Defendant knowingly and intentionally published written statements about Plaintiffs on the internet, including but not limited to www.Instagram.com and other social media platforms.

22. Such statements were posted with malice and the intention of harming Plaintiff and were not personal opinions.

23. The statements accusing Plaintiff of the horrendous crimes of rape and human trafficking are inherently harmful to a person as well as a business owner who works with women and children.

24. These statements were all available to third-parties and in fact read by third-parties which is evidenced by the ongoing communication and commenting made by third-parties and Defendant. In fact, the post on which these statements were made has accrued 1,598 views at the time of this Complaint. *See Exhibit 2.*

25. These statements were knowingly false and were intentionally published or published with reckless disregard.

26. These statements were made with malicious intent to harm MICHAEL CIPRIANNI personally.

27. As a direct result of Defendant's unlawful actions, Plaintiff has suffered direct harm, including reputational harm to Plaintiff and Plaintiff's family.

28. Defendant has continued to publicly post and defame Plaintiffs and as such Plaintiffs continue to suffer harm.

WHEREFORE, Plaintiff, MICHAEL CIPRIANNI respectfully request that this Honorable Court enter judgement awarding Plaintiff such damages, including compensatory, actual and punitive damages, a permanent injunction, an order requiring any websites displaying the false

statements remove and disable such posts and all attorney fees and costs, as are appropriate in view of Defendants' ongoing conduct and any other relief this Court deems just.

DEMAND FOR JURY TRIAL

Plaintiff demands a jury for all issues so triable.

Dated: June 11, 2026

Respectfully Submitted,

By: /s/KELLY ANN M. DESROSIERS

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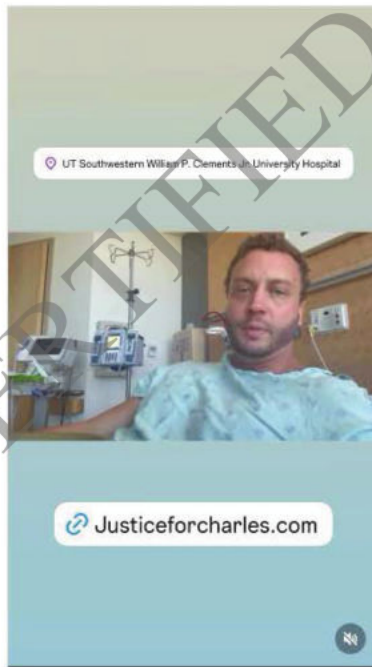
Telephone: (561) 953-9300

Direct: (561) 953-9301

Attorneys for Plaintiff

Exhibit 1

NOT A CERTIFIED COPY



bigcat699 · Follow
Original audio

murders are

+

geanina.ioana.568 11w
👍👍👍
Like Reply

bigcat699 20w
He's a murderer proven rapist and human trafficker
Like Reply

bigcat699 20w
They have 2 rape victims that have come to me in confidence but are too afraid of them to come forward until they are jail and can't harm them; they know many other victims too the fact no one cares to reshare to put this evil boggles my mind

👍 22 🗨 6 📌

December 5, 2025

Log in to like or comment.

NOT A CERTIFIED COPY

Exhibit 2

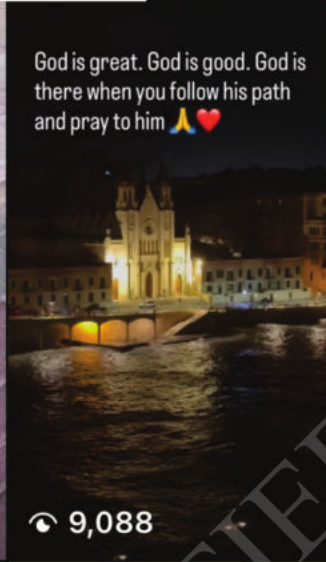
NOT A CERTIFIED COPY

< bigcat699

Follow



1,007



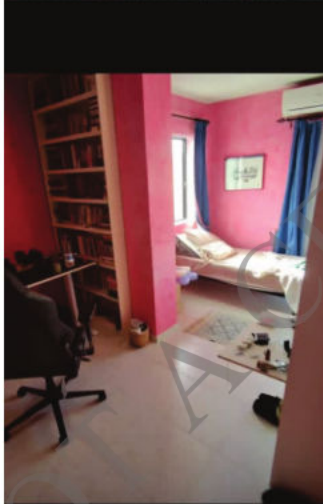
God is great. God is good. God is there when you follow his path and pray to him 🙏❤️

9,088



Royal flush things are getting fun 🎲🔥🎲

2,391



2,456



Southwestern Willamette University Hospital

Justiceforcharles.com

1,598



1,226



3,055



So proud of my Mom she's a warrior 🙏❤️

3,027



1,064