

**IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA**

SHEILA CHERFILUS-MCCORMICK

CIVIL DIVISION

Plaintiff,

CASE NO.:

vs.

ELIJAH MANLEY.

Defendant.

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COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, **SHEILA CHERFILUS-MCCORMICK** (“Plaintiff”) files this Complaint and sues **ELIJAH MANLEY** (“MANLEY”), for defamation and damages, demands a trial by jury, and hereby states as follows:

1. This is an action seeking damages in excess of \$1,000,000.00 and other relief by Plaintiff for libel and slander to Mrs. CHERFILUS-MCCORMICK and her family’s good name and reputation.
2. Plaintiff is a Broward County resident.
3. Defendant **ELIJAH MANLEY** is a Broward County resident and is otherwise sui juris.
4. Defendant **ELIJAH MANLEY** is a politician currently running for Congress and a candidate for Plaintiff’s District 20 seat in 2026.
5. Plaintiff is the current U.S. Congresswoman representing the 20th District of Florida, a public servant, a political reformer, and a law school graduate.
6. Plaintiff is a public servant with an impeccable reputation inside and outside of her community.

7. Plaintiff has always been involved in her community, an advocate for the residents and businesses in Florida and is devoted to public service.

8. Defendant, a political candidate, has engaged in a pattern of making false and defamatory statements about Plaintiff, with the intent to harm Plaintiff's personal and professional reputation.

9. Through campaign videos on Instagram and published columns, Defendant has deliberately spread malicious and false statements about Plaintiff, resulting in reputational harm and public discredit.

10. In a campaign video posted on Instagram, Defendant stated, 'You can't fight corruption with more corruption — or with representatives who are themselves under investigation for serious ethical violations.' This statement, clearly referring to Plaintiff, is false, malicious, and intended to harm Plaintiff's reputation."

11. In the same Instagram campaign video, Defendant made the following statements about Congresswoman Sheila Cherfilus-McCormick: 'Took \$5.7 million from taxpayers and shows bad judgment on her part,' followed by, 'Regular people don't get away with these types of crimes,' and, 'She was busy taking your money to chase power.' These statements collectively imply that Plaintiff engaged in misconduct and exercised poor judgment, and were made with actual malice and intent to damage her reputation both personally and professionally.

12. In a written letter to the editor in the Sun Sentinel, Defendant stated, "For years, I rooted for U.S. Rep. Sheila Cherfilus-McCormick, but the Democrats' collapse in our state has coincided with her election and the many ethical and legal scandals she brought to Congress."

13. Defendant also further states “The latest House Ethics Committee report on its years-long investigation details yet more allegations – newly uncovered – alleging that she steered taxpayer dollars to a for-profit company supportive of her campaign, in violation of House ethics rules and federal law.”

14. Defendant MANLEY has engaged in slandering the Plaintiff to the point of damaging her reputation and inflicting great emotional harm.

15. Defendant MANLEY has repeatedly made false statements that he knows to be false and done it with the primary malicious purpose of causing injury to the Plaintiff in her activist, personal, and professional life.

16. All of Defendant’s aforementioned statements are not only completely false but done with the malicious purpose of inflicting harm.

COUNT I - LIBEL

17. This is an action for libel.

18. The allegations of paragraphs 1 through 16 are realleged as if fully set forth herein.

19. The statements made by the Defendant contained false, scandalous, and defamatory statements concerning the Plaintiff.

20. The aforementioned statements were published and disseminated to third parties.

21. All of the statements identified were false and made by the Defendant with knowledge of their falsity or reckless disregard for the truth.

22. All of the above statements were made by Defendant, with the primary malicious purpose of causing injury to the Plaintiff in her activist, personal, and social life.

23. The above-mentioned statements exposed the Plaintiff to hatred, ridicule, distrust, and contempt, by the public. The statements injured the Plaintiff's participation in community activism in that the statements accused the Plaintiff of committing, among other things, deceitful and dishonest acts.

24. As a direct and natural consequence of the publication of the statements in this complaint, the Plaintiff has suffered injury to her reputation and good name, she has suffered damages to her public image as a citizen and public official and has been damaged irreparably. Plaintiff has also suffered mental anguish resulting from the patently false and libelous statements.

WHEREFORE, Plaintiff demands judgment against the Defendant for damages together with an award of costs. Plaintiff demands a trial by jury on all issues so triable by jury as a matter of right.

COUNT II - LIBEL PER SE

25. The allegations contained in paragraphs 1 through 16 are realleged and revered, as if fully set forth herein.

26. This is a count for libel per se.

27. The images contained herein contain false, scandalous, and defamatory statements concerning the Plaintiff. Defendant published the false statements to third parties.

28. The false statements published by Defendant exposed Plaintiff to distrust, disgrace, hatred, contempt, ridicule, and obloquy by the public. They also were targeted to and did cause destruction to her as a citizen and public official.

29. The subject statements contained in the defamatory publication are further defamatory per se in that they imputed to the Plaintiff, characteristics incompatible, with the proper exercise of her participation as a citizen and public official. More specifically the subject statements accused the Plaintiff of committing dishonest and deceitful acts.

30. All of the above statements were made by Defendant with the primary purpose of causing injury to the Plaintiff in her capacity as a public official, businesswoman and as a citizen.

31. As a direct and natural consequence of the publication of the false defamatory statement by Defendant, Plaintiff has suffered injury to her reputation and good name, she has suffered damages to her image as a public official and Plaintiff has suffered mental anguish from same.

WHEREFORE, Plaintiff demands judgement against Defendant demands a trial by jury on all issues so triable by jury as matter of right.

COUNT III - DECLARATORY RELIEF UNDER F.S. § 784.048

32. Plaintiffs reaffirms and realleges paragraphs numbered 1 through 16 as set forth above.

33. §784.048 of the Florida Statutes states in relevant part - “Cyberstalk” means:

1. To engage in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or through the use of electronic mail or electronic communication, directed at a specific person; or

2. To access, or attempt to access, the online accounts or Internet- connected home electronic systems of another person without that person's permission, causing substantial emotional distress to that person and serving no legitimate purpose.

34. Plaintiff continues to suffer from MANLEY'S continued attacks on her character.

35. MANLEY continues to obsessively harass Plaintiff through mass publication in violation of F.S. 784.048.

36. The Plaintiff seeks actual injunctive relief from this Court due to the unrelenting and continued harassment by MANLEY.

37. The Plaintiff is without an adequate remedy at law and thus requires a declaration of this Court that MANLEY continues to stalk her.

WHEREFORE, the Plaintiff requests that this Court declare that MANLEY has engaged in cyberstalking of the Plaintiff after a written warning in direct violation of F.S. §784.048.

COUNT IV - INJUNCTIVE RELIEF FOR REPEATED VIOLATIONS OF F.S. § 784.048

38. Plaintiff reaffirms and realleges paragraphs 1 through 16 as set forth above.

39. "The issuance of a preliminary injunction is an extraordinary remedy which should be granted sparingly, which must be based upon a showing of the following criteria: (1) The likelihood of irreparable harm; (2) the unavailability of an adequate remedy at law; (3) substantial likelihood of success on the merits; and (4) considerations of the public interest." *City of Jacksonville v. Naegele Outdoor Advertising Co.*, 634 So.2d 750 (Fla. P1 DCA,1994).

40. Should MANLEY not be enjoined from further harassment of the Plaintiff, he will continue to falsely attack her, destroying her good reputation and character and causing financial harm. The Plaintiff will suffer irreparable harm as the result of MANLEY'S continued harassment.

41. The Plaintiff is without an adequate remedy at law to stop MANLEY'S continued harassment if this Court denies an injunction.

42. The issuance of this injunction serves the public interest.

43. MANLEY continues to falsely allege that the Plaintiff is a crook and a liar and continues to repeatedly defame the Plaintiff throughout social media and various publications.

WHEREFORE, the Court is respectfully requested to assert and assume jurisdiction and enter judgment based on F.S. §784.048 finding that MANLEY has stalked and cyberbullied the Plaintiff on social media platforms and enjoin MANLEY from attacking CHERFILUS-MCCORMICK.

Respectfully submitted,

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