

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, FLORIDA
CIVIL DIVISION**

**CHRISTOPHER CASEY,
and ASHLEY CASEY,**

Plaintiffs,

Case No.:

vs.

**CHRISTOPHER COSTELLO,
And FRANCIS COSTELLO,**

Defendants.

_____ /

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiffs, CHRISTOPHER CASEY and ASHLEY CASEY, by and through undersigned counsel, file this action against Defendants, CHRISTOPHER COSTELLO, and FRANCIS COSTELLO, and allege as follows:

ALLEGATIONS RELATING TO JURISDICTION, VENUE, AND PARTIES

1. This action is for damages in excess of Fifty thousand dollars (\$50,000.00).
2. The acts which form the basis for this Complaint, and the causes of action set forth herein, occurred in Sarasota County, Florida.
3. This action is being brought by CHRISTOPHER CASEY and ASHLEY CASEY, Florida residents, who reside in Sarasota County, Florida.
4. CHRISTOPHER CASEY and ASHLEY CASEY are married, and living in Sarasota County, Florida.
5. Defendants, CHRISTOPHER COSTELLO and FRANCIS COSTELLO are Florida residents, who reside in Sarasota County, Florida, and are also married.

6. The Plaintiffs have retained the undersigned counsel, and have agreed to pay a reasonable fee for the services provided.

**FACTUAL ALLEGATIONS AGAINST CHRISTOPHER COSTELLO COMMON
TO ALL COUNTS**

7. Plaintiffs, CHRISTOPHER CASEY and ASHLEY CASEY re-allege paragraphs One (1) through Six (6) above.
8. CHRISTOPHER CASEY works for a company called “Wifi Money” whose primary purpose is to work with individuals and businesses to reach customers online through various social media platforms on the internet, including Instagram, and YouTube, among others.
9. As part and parcel of his work with Wifi Money, CHRISTOPHER CASEY regularly comes into contact with individuals and businesses whose interests align, and whose mutual goals and talents generate income beneficial to both parties.
10. CHRISTOPHER COSTELLO and CHRISTOPHER CASEY were close friends for over nineteen years prior to the events alleged in the instant complaint.
11. CHRISTOPHER COSTELLO established, and continues to maintain, a real estate practice, and has benefitted over the years from the expertise and assistance of CHRISTOPHER CASEY in regard to the amplification of CHRISTOPHER COSTELLO’s online presence in order to attract customers.
12. During the course of the friendship, CHRISTOPHER CASEY introduced CHRISTOPHER COSTELLO to a number of businesses, and additional financial

opportunities with the hope that CHRISTOPHER COSTELLO could increase CHRISTOPHER COSTELLO's financial worth, and amplify CHRISTOPHER COSTELLO's business opportunities both online and otherwise.

13. Some of the aforementioned ventures CHRISTOPHER CASEY assisted CHRISTOPHER COSTELLO with include employee retention credit (ERC), cryptocurrency, and e-commerce opportunities.
14. CHRISTOPHER COSTELLO prospered significantly in regard to the employee retention credit (ERC) venture, and has earned at least \$86,000.00 from the ERC opportunity recommended to him by CHRISTOPHER CASEY.
15. CHRISTOPHER COSTELLO also succeeded financially in regard to the cryptocurrency opportunity to which CHRISTOPHER CASEY introduced him.
16. In regard to his success in the cryptocurrency business, CHRISTOPHER COSTELLO texted the following to CHRISTOPHER CASEY on August 27, 2021, "\$300k!" and posted a .gif with a gentleman at a bank machine, with money flying out of it. He then followed up with a text to CHRISTOPHER CASEY stating, "Bro, thank you so much for bringing us in on this! I can't thank you enough." CHRISTOPHER COSTELLO texted again the same day the following to CHRISTOPHER CASEY, "Bro! This is crazy! 325k! We care about you all too! BFFs."
17. In regard to e-commerce, one of the businesses to whom CHRISTOPHER CASEY introduced CHRISTOPHER COSTELLO was DBC Limited. DBC Limited assists individuals with the establishment and maintenance of e-commerce businesses.

18. Upon information and belief, CHRISTOPHER COSTELLO entered into a written agreement with DBC Limited in December 2020.
19. In March of 2022, CHRIS COSTELLO was still representing his status as a “Wifi Money Partner” and “Passive Income Advisor” on his Instagram account.
20. Upon information and belief, CHRISTOPHER COSTELLO and DBC Limited had a dispute pertaining to CHRISTOPHER COSTELLO’s e-commerce arrangement with that company.
21. Upon information and belief, CHRISTOPHER COSTELLO complained publicly about his e-commerce contract with DBC Limited, which prompted DBC Limited to serve CHRISTOPHER COSTELLO with a “Notice to Cease and Desist” letter.
22. In June of 2022, CHRIS COSTELLO was still recommending that others work with Wifi Money and CHRIS CASEY in order facilitate the establishment of E-Commerce stores.
23. Upon information and belief, CHRISTOPHER COSTELLO and DBC Limited entered into an agreement pertaining to the dispute between those parties on or about June 22, 2022, thus ending the disagreement between those parties.
24. On July 4, 2022, CHRISTOPHER COSTELLO sent a text to one of the owners of “Wifi Money”, CHRISTOPHER FREDERICK, which included a selfie of CHRISTOPHER COSTELLO sporting a Wifi Money hat, holding a Wifi Money Yeti, and a cigar, and exclaiming to CHRISTOPHER FREDERICK, “Happy 4th brother!”

25. Yet, despite having achieved recent success with cryptocurrency and ERC opportunities obtained through the friendship and assistance of CHRISTOPHER CASEY, and despite having reached an agreement with the company that established his e-commerce business, CHRISTOPHER COSTELLO has since engaged in an all-out public assault upon CHRISTOPHER CASEY, ASHLEY CASEY, and Wifi Money, among others, blaming all for the alleged lack of success in his e-commerce business.
26. In the fall of 2022, CHRISTOPHER COSTELLO started to complain publicly again about his e-commerce business.
27. On October 21, 2022, CHRISTOPHER COSTELLO apologized for defaming Wifi Money, and its principals, and texted to CHRISTOPHER FREDERICK the following, “Sorry for being a drama queen bro! I was deep in my feelings the other week. Chris and I talked it out and all is good.”
28. Yet, despite his aforementioned apology, CHRISTOPHER COSTELLO re-ignited with earnest his defamation campaign against CHRISTOPHER CASEY, ASHLEY CASEY, and Wifi Money in November 2022, when he created a Reddit page under the pseudonym “scammedbyecomm.”
29. CHRISTOPHER COSTELLO posted on the foregoing Reddit page, and referred to “**WiFi crooks**” and encouraged fellow users “to put people like CHRIS CASEY on blast.”
30. On January 11, 2023, CHRISTOPHER COSTELLO accelerated his defamation campaign with an Instagram post entitled “Are you constantly seeing people in your feed

taking about ‘passive’ income or e-commerce stores?”, with an option to click “Yes! all the time!” or “never.”

31. On January 11, 2023, CHRISTOPHER COSTELLO posted on Instagram pictures from the Wifi Money website, with the caption, “And I know 20+ people personally with the same or worse results! Don’t fall for all this BS that you see on IG! They are making the money, not you.”
32. CHRISTOPHER COSTELLO’s defamation campaign escalated even further in April 2023. Specifically, on April 5, 2023, CHRISTOPHER COSTELLO, again through the pseudonym “scammedbyecomm” on the platform Reddit, posted the following, “The companies mentioned (Wifi Money, DBC, etc) sold Walmart e-commerce stores to 100s (if not more) of people for up to \$40,000 each promising a passive income stream and high percentage of profit margins. All of these stores were terminated within a matter of a few months leaving many people including myself with nothing. Investors were lied to as to why this happened and blamed 100% of it on Walmart. These companies continue to sell e-commerce stores the unknowing investors today through other platforms such as Facebook, Amazon FBA, and even Youtube. This thread has helped many of us connect over our lost investments, share insight on any potential litigation options, and also helped spread the word to many others thinking about these **horrible people** and the **flat out lies** they are spreading through social media about their success.”
33. On April 17, 2023, CHRISTOPHER COSTELLO posted the following on his Instagram account, “Please share if you know anyone affected. Unfortunately there are so many

people affected both locally and nationwide.” He then placed a link to the site
“**wifimoneyfraud.wixsite.com.**”

34. The aforementioned site **wifimoneyfraud.wixsite.com** which CHRISTOPHER COSTELLO linked to his Instagram account on April 17, 2023 states the following in pertinent part:

“Wifi Money Fraud: Amazon and Walmart Scam”

We are a group of people who have been **scammed** by WIFI Money and Associated companies. Help us stop these **criminals**: Wifi Money – Main Company.

Businesses are encouraged to be cautious with plans announced by Wifi Money regarding The Employee Retention Credit (ERC). This company and partners are **professional scammers**.

If you were scammed and recognize one of these **criminals**, submit a complaint.

35. The **wifimoneyfraud.wixsite.com** site goes on to list the aforementioned “**criminals**” as follows:

Wifi Money – CHRIS FREDERICK : Conspirator 1
Wifi Money – ALEXANDER MOELLER: Conspirator 2
Wifi Money – WILLY MOELLER: Conspirator 3
Wifi Money – DANIELA MOELLER: Conspirator 4
Wifi Money – CHRIS CASEY: Conspirator 5
Wifi Money – ASHLEY CASEY: Conspirator 6

Submit Claim on Line: Internet Crime Complaint Center

Federal Bureau of Investigation

Federal Trade Commission

Securities and Exchange Commission

36. CHRISTOPHER COSTELLO followed the foregoing posting of the aforementioned link describing CHRISTOPHER CASEY and ASHLEY CASEY as “criminal conspirators” with the following additional Reddit post through his “scammedbyecomm” pseudonym on April 18, 2023, “My own loss! I unfortunately fell for the claimed success of Wifi Money and their partners. I invested \$35,000 over 2 years ago and have had nothing but issues and losses to show for it. The entire time Wifi Money had continued selling these e-commerce stores claiming success. **These people are 21st century snake oils salesman! Do not trust them or any company they partner with.**”
37. On April 22, 2023, CHRISTOPHER COSTELLO again posted on the Reddit platform, and stated the following, “**Wifi Money are filled with scammers! Chris Frederick, Alex Moeller, Billy Moeller, Chris Casey, Ashley Casey, Todd Cahill are just the major players.**”
38. On April 22, 2023, a Reddit user, responding to the page started by CHRISTOPHER COSTELLO, stated “They are going down! **Hope they look good in orange jumpsuits.** Liz Friesen getting arrested soon! Can’t wait!!!.” CHRISTOPHER COSTELLO responded as follows, “**Oh really! That’s great news! She was one of the ring leader’s (Chris Casey) proteges! He should be right behind her.**”
39. Each of the foregoing statements made by CHRISTOPHER COSTELLO was false.
- FACTUAL ALLEGATIONS AGAINST FRANCIS COSTELLO COMMON TO ALL COUNTS**
40. In February 2023, FRANCIS COSTELLO joined in her husband’s defamation campaign against CHRISTOPHER CASEY, ASHLEY CASEY, and Wifi Money.

41. Specifically, in her Instagram feed, on February 23, 2023 FRANCIS COSTELLO referred to Wifi Money and its principals as “phonies” imploring those on her Instagram feed to not “let them steal (their) money.”
42. On the same day, FRANCIS COSTELLO shared alleged comments from other Instagram users, referring to Wifi Money and its principals as “scammers”, stating that “Wifi Money had fucked them over,” among other defamatory comments.
43. On March 30, 2023, FRANCIS COSTELLO escalated her public assault on Wifi Money and its principals by posting portions of the Wifi Money website on her Instagram feed, and referring to Wifi Money and its principals as “Scammers” accusing them of “lying”, and defaming the ERC opportunity outlined on Wifi Money’s website.
44. Ironically, FRANCIS COSTELLO opted to defame Wifi Money’s ERC business venture while at the same she and her husband, CHRISTOPHER COSTELLO were profiting from that very same business, which had been recommended to them by CHRISTOPHER CASEY.
45. Similar to her husband’s April 2023 escalation of his defamation campaign against Wifi money and its principals, FRANCIS COSTELLO posted on her Instagram account in April 2023 an alleged account of a “victim” of Wifi Money, wherein Wifi Money is referred to as an “organized crime ring”, and its principals are described as “monsters”. In the same post, FRANCIS COSTELLO directs her Instagram followers to her husband’s Reddit link outlined herein.
46. As noted in paragraphs Thirty-Three (33) through Thirty-Nine (39) above, on April 17, 2023, FRANCIS COSTELLO’S husband, CHRISTOPHER COSTELLO posted the following on his Instagram account, “Please share if you know anyone affected.

Unfortunately there are so many people affected both locally and nationwide.” He then placed a link to the site “**wifimoneyfraud.wixsite.com.**”

47. The aforementioned site **wifimoneyfraud.wixsite.com** posted by CHRISTOPHER COSTELLO on April 17, 2023 on his Instagram account states the following in pertinent part:

“Wifi Money **Fraud: Amazon and Walmart Scam**”

We are a group of people who have been **scammed** by WIFI Money and Associated companies. Help us stop these **criminals**: Wifi Money – Main Company.

Businesses are encouraged to be cautious with plans announced by Wifi Money regarding The Employee Retention Credit (ERC). This company and partners are **professional scammers**.

If you were scammed and recognize one of these **criminals**, submit a complaint.

48. The **wifimoneyfraud.wixsite.com** site goes on to list the aforementioned “**criminals**” as follows:

Wifi Money – CHRIS FREDERICK : Conspirator 1
Wifi Money – ALEXANDER MOELLER: Conspirator 2
Wifi Money – WILLY MOELLER: Conspirator 3
Wifi Money – DANIELA MOELLER: Conspirator 4
Wifi Money – CHRIS CASEY: Conspirator 5
Wifi Money – ASHLEY CASEY: Conspirator 6

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Federal Bureau of Investigation

Federal Trade Commission

Securities and Exchange Commission

49. CHRISTOPHER COSTELLO followed the foregoing posting of the aforementioned link describing CHRISTOPHER CASEY and ASHLEY CASEY as a “criminal conspirators” with the following additional Reddit post through his “scammedbyecomm” pseudonym on April 18, 2023, “My own loss! I unfortunately fell for the claimed success of Wifi Money and their partners. I invested \$35,000 over 2 years ago and have had nothing but issues and losses to show for it. The entire time Wifi Money had continued selling these e-commerce stores claiming success. **These people are 21st century snake oils salesman! Do not trust them or any company they partner with.**”
50. On April 22, 2023, CHRISTOPHER COSTELLO again posted on the Reddit platform, and stated the following, “**Wifi Money are filled with scammers! Chris Frederick, Alex Moeller, Billy Moeller, Chris Casey, Ashley Casey, Todd Cahill are just the major players.**”
51. On April 22, 2023, a Reddit user, responding to the page started by CHRISTOPHER COSTELLO, stated “They are going down! **Hope they look good in orange jumpsuits.** Liz Friesen getting arrested soon! Can’t wait!!!.” CHRISTOPHER COSTELLO responded as follows, “**Oh really! That’s great news! She was one of the ring leader’s (Chris Casey) proteges! He should be right behind her.**”
52. Each of the foregoing statements made by FRANCIS COSTELLO, and linked to by FRANCIS COSTELLO were false.

**COUNT I – THE CASEYS’ DEFAMATION *PER SE* ACTION AGAINST CHRIS
AND FRANCIS COSTELLO**

53. The Plaintiffs hereby repeat and reallege paragraphs one (1) through fifty-two (52) above as though fully stated herein.
54. The false statements made by CHRIS COSTELLO and FRANCIS COSTELLO pertaining to the Plaintiffs were made with knowledge, reckless disregard, or negligence as to their falsity.
55. Under Florida law, a publication is libelous *per se*, if when considered along without innuendo: (1)charges that a person has committed an infamous crime; (2)it charges a person with having an infectious disease; (3)it tends to subject one to hatred, distrust, ridicule, contempt, or disgrace; **or** (4) it tends to injure one in his trade or profession.
56. The Plaintiffs need only allege one of the foregoing four categories applies to the false statements leveled against them by CHRISTOPHER COSTELLO and FRANCIS COSTELLO in order to maintain a Defamation *Per Se* cause of action against CHRISTOPHER COSTELLO.
57. In fact, the false statements outlined in paragraphs twenty-eight (28) through fifty-two herein satisfy three of the four examples permitted under Florida law.
58. CHRISTOPHER COSTELLO and FRANCIS COSTELLO’S multiple references to CHRISTOPHER CASEY and ASHLEY CASEY as “criminals” are examples of the first category of defamation *per se*, which sets forth that a person has committed an infamous crime.
59. CHRISTOPHER COSTELLO and FRANCIS COSTELLO’S references to CHRISTOPHER CASEY and ASHLEY CASEY as “criminals”, “scammers”,

“professional scammers”, “21st century snake oils salesman”, “horrible people”, are examples the third category of defamation *per se*, namely words that tend to subject one to hatred, distrust, ridicule, contempt, or disgrace.

60. CHRISTOPHER COSTELLO and FRANCIS COSTELLO’S statements as noted throughout paragraphs twenty-eight (28) through fifty-two (52) are also words that tend to injure the CASEYS in their trades or professions.
61. Accordingly, CHRISTOPHER COSTELLO and FRANCIS COSTELLO’s libelous words against CHRISTOPHER CASEY and ASHLEY CASEY amount to defamation *per se*, as contemplated by Florida law.
62. As the direct and proximate result of the false statements published by CHRISTOPHER COSTELLO and FRANCIS COSTELLO, the Plaintiffs CHRISTOPHER CASEY and ASHLEY CASEY have been defamed and have suffered and will continue to suffer damages that include but are not limited to personal humiliation, mental pain and suffering, fear, anxiety, anguish, embarrassment, inconvenience, loss of lifestyle, interruption in business, loss of income and opportunity to earn income in the future, loss of or impairment of the ability to enjoy life, impairment to their reputation and standing in the community, and injury to their personal and social relations.

WHEREFORE, CHRISTOPHER CASEY and ASHLEY CASEY demand judgment against CHRISTOPHER COSTELLO and FRANCIS COSTELLO for general damages, special damages, and all other damages allowed under Florida law, along with costs incident to the maintenance of this action. CHRISTOPHER CASEY and ASHLEY CASEY also demand a trial by jury.

**COUNT II- CHRISTOPHER CASEY’S TORTIOUS INTERFERENCE WITH A
BUSINESS RELATIONSHIP ACTION AGAINST CHRISTOPHER COSTELLO**

AND FRANCIS COSTELLO

63. Plaintiff CHRISTOPHER CASEY hereby repeats and realleges paragraphs one (1) through sixty-two (62) above as though fully restated herein.
64. As noted herein, CHRISTOPHER CASEY works for a company whose primary purpose is to connect individuals and business on the internet in order to facilitate commerce, and mutually improve the lot of entrepreneurs as well as established companies.
65. CHRISTOPHER CASEY’s on-line reputation, and standing on the internet is of critical importance to his maintenance of existing business relationships, and the formation of future financial endeavors.
66. In short, CHRISTOPHER CASEY’s internet presence is central to his livelihood, and that is a fact that is well-known to CHRISTOPHER COSTELLO and FRANCIS COSTELLO.
67. At the time of the statements made against CHRISTOPHER CASEY on the internet by CHRISTOPHER COSTELLO and FRANCIS COSTELLO, the following conditions existed:
- a. CHRISTOPHER CASEY had multiple business relationships which were dependent upon CHRISTOPHER CASEY’s credibility and standing on the internet; and
 - b. CHRISTOPHER COSTELLO and FRANCIS COSTELLO knew that CHRISTOPHER CASEY’S reputation on the internet was central to the maintenance of CHRISTOPHER CASEY’S existing business relationships, the development of future business, and his very livelihood.

68. For reasons solely stemming from malice, CHRISTOPHER COSTELLO and FRANCIS COSTELLO, as outlined herein, acted with intent, and without justification when they defamed CHRISTOPHER CASEY.
69. As a direct and proximate result of the actions of CHRISTOPHER COSTELLO and FRANCIS COSTELLO, CHRISTOPHER CASEY has suffered from the destruction of present business relationships, as well as the loss of future potential financial dealings.

WHEREFORE, CHRISTOPHER CASEY demands judgment against CHRISTOPHER COSTELLO and FRANCIS COSTELLO for general damages, special damages, and all other damages allowed under Florida law, along with costs incident to the maintenance of this action. CHRISTOPHER CASEY also demands a trial by jury.

COUNT III – THE CASEYS’ CYBERSTALKING CAUSE OF ACTION
AGAINST CHRIS COSTELLO AND FRANCIS COSTELLO

70. The Plaintiffs, CHRISTOPHER CASEY and ASHLEY CASEY hereby repeat and reallege paragraphs one (1) through fifty-two (52) above as though fully stated herein.
71. Section 784.048(d) of the Florida Statutes defines “Cyberstalking” as follows: “To engage in a course of conduct to communicate, or to cause to be communicated, directly or indirectly, words, images, or language by or through the use of electronic mail or electronic communication, directed at or pertaining to a specific person causing substantial emotional distress to that person and serving no legitimate purpose.” Id.
72. As applied, the aforementioned post and links shared by CHRISTOPHER COSTELLO and FRANCIS COSTELLO are directed specifically at both CHRISTOPHER CASEY

and ASHLEY CASEY, and pertain to both CHRISTOPHER CASEY and ASHLEY CASEY.

73. As the direct and proximate result of the statements published by CHRISTOPHER COSTELLO and FRANCIS COSTELLO, the Plaintiffs CHRISTOPHER CASEY and ASHLEY CASEY have suffered substantial emotional distress, and will continue to suffer damages that include but are not limited to personal humiliation, mental pain and suffering, fear, anxiety, anguish, embarrassment, inconvenience, loss of lifestyle, interruption in business, loss of income and opportunity to earn income in the future, loss of or impairment of the ability to enjoy life, impairment to their reputation and standing in the community, and injury to their personal and social relations.
74. Finally, the social media posts directed by CHRISTOPHER COSTELLO and FRANCIS COSTELLO against the CASEYS serve no legitimate purpose whatsoever. As stated herein, the COSTELLOS made money in regard to the cryptocurrency business, made money in the ERC business, and resolved whatever dispute they had with DBC Limited in June of 2022 as it relates to their e-commerce business. Further, neither CHRISTOPHER COSTELLO nor FRANCIS COSTELLO is a business competitor of either CHRISTOPHER CASEY or ASHLEY CASEY. There is simply no legitimate purpose for the conduct engaged in by CHRISTOPHER COSTELLO or FRANCIS COSTELLO, and their actions have caused substantial harm to the Plaintiffs, as alleged herein.

WHEREFORE, CHRISTOPHER CASEY and ASHLEY CASEY demand judgment against CHRISTOPHER COSTELLO and FRANCIS COSTELLO for general damages,

special damages, and all other damages allowed under Florida law, along with costs incident to the maintenance of this action. CHRISTOPHER and ASHLEY CASEY also demand a trial by jury.

**COUNT IV – THE CASEYS’ HARASSMENT CAUSE OF ACTION AGAINST
CHRISTOPHER COSTELLO AND FRANCIS COSTELLO**

75. The Plaintiffs, CHRISTOPHER CASEY and ASHLEY CASEY hereby repeat and reallege paragraphs one (1) through fifty-two (52) above as though fully stated herein.
76. Section 784.048 of the Florida Statutes defines harassment as follows, “‘Harass’ means to engage in a course of conduct directed at a specific person which causes substantial distress to that person and serves no legitimate purpose.” Id.
77. As applied, CHRISTOPHER COSTELLO and FRANCIS COSTELLO have engaged in an all-out assault against the CASEYS for several months on the internet, with escalating language in April 2023, as alleged herein.
78. Further, there is no legitimate purpose for the conduct in which CHRISTOPHER COSTELLO and FRANCIS COSTELLO have engaged in, and continue to engage in, against the CASEYS. Neither CHRISTOPHER CASEY nor ASHLEY CASEY is a competitor of either CHRISTOPHER COSTELLO or FRANCIS COSTELLO.
79. In addition, and as detailed herein, both CHRISTOPHER COSTELLO and FRANCIS COSTELLO have prospered financially because of the actions and assistance provided by CHRISTOPHER CASEY as it relates to CHRISTOPHER COSTELLO’s cryptocurrency and ERC endeavors. And as to CHRISTOPHER COSTELLO’s e-

commerce business, CHRISTOPHER CASEY spent countless hours helping CHRISTOPHER COSTELLO to achieve his goals, and ultimately, CHRISTOPHER COSTELLO reached a written agreement with DBC Limited resolving whatever dispute CHRISTOPHER COSTELLO had with that company.

80. Put simply, there is not, nor has there ever been, a legitimate purpose for the defamation war waged by CHRISTOPHER COSTELLO and FRANCIS COSTELLO against CHRISTOPHER CASEY and ASHLEY CASEY.

81. As the direct and proximate result of the statements published by CHRIS COSTELLO and FRANCIS COSTELLO, the Plaintiffs CHRISTOPHER CASEY and ASHLEY CASEY have suffered substantial emotional distress, and will continue to suffer damages that include but are not limited to personal humiliation, mental pain and suffering, fear, anxiety, anguish, embarrassment, inconvenience, loss of lifestyle, interruption in business, loss of income and opportunity to earn income in the future, loss of or impairment of the ability to enjoy life, impairment to their reputation and standing in the community, and injury to their personal and social relations.

WHEREFORE, CHRISTOPHER CASEY and ASHLEY CASEY demand judgment against CHRISTOPHER COSTELLO and FRANCIS COSTELLO for general damages, special damages, and all other damages allowed under Florida law, along with costs incident to the maintenance of this action. CHRISTOPHER and ASHLEY CASEY also demand a trial by jury.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury on all Counts.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above and foregoing has been furnished to the Defendants by service of process:

STOCKHAM LAW GROUP



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