

**COPY**

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT  
IN AND FOR COLLIER COUNTY, FLORIDA

FILED 17  
COLLIER COUNTY, FLORIDA  
2011 AUG 31 PM 2:45  
CLERK OF COURTS  
BY \_\_\_\_\_ D.C.

ARNON RONY JOEL,

Plaintiff,

vs.

CASE NO.: 11-2840-CA

MARIO SANCHEZ,

Defendant.

**COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiff, ARNON RONY JOEL (hereinafter "JOEL" and/or "Plaintiff"), sues Defendant, MARIO SANCHEZ ("SANCHEZ"), and alleges:

1. This is an action for damages that exceed Fifteen Thousand Dollars (\$15,000.00), exclusive of attorney's fees, interest and costs, and other equitable relief.
2. At all times material, Plaintiff JOEL was and remains a resident and citizen of Marco Island, Collier County, Florida.
3. At all times material, Defendant SANCHEZ was and remains a resident and citizen of Marco Island, Collier County, Florida.
4. Venue is proper in Collier County, Florida because all causes of action set forth herein occurred in Collier County, Florida and because defendant SANCHEZ resides in Collier County, Florida.
5. In June 2011, SANCHEZ made false statements about JOEL to representatives of Journal Broadcast Group, Inc. d/b/a Fox 4 In Your Corner ("Fox 4"), including without limitation as follows: (a) that Plaintiff lied to the public and in City Council meetings, and that documentation exists to prove that he had lied; (b) that Plaintiff ordered workers to dig up Marco

Island's concrete water pipes containing cancer causing asbestos, causing harm to the public; (c) that Plaintiff used a machine to somehow wrongfully crush pipes, causing harm to the public; (d) that in 2007, Plaintiff dumped huge amounts of toxic waste into the city's canals and waterways causing people to become sick, and that the water poured out for weeks and contained toxic levels of hydrogen sulfide; (E) that because of Plaintiff the City of Marco Island was cited by the Environmental Protection Agency for dumping the toxins; (F) that Plaintiff was under investigation by the FBI for some sort of kick-back scheme; (G) that Plaintiff held a political fundraiser to obtain a large contract for his then company; and (H) that Plaintiff improperly selected a contractor for work for Marco Island, Florida (collectively hereinafter, "the False Statements").

6. The False Statements were subsequently published on FOX 4 in print and on the air during one or more news broadcasts

7. Both before and after SANCHEZ made the False Statements to Fox 4, SANCHEZ made similarly wrongful false statements to other third parties both verbally and in print, including without limitation as follows: (a) a July 12, 2011 Commentary piece in the Marco Island Times, a copy of which is attached hereto as **Exhibit "A,"** and incorporated herein by reference; and (b) an August 19, 2011 mass e-mail, a copy of which is attached hereto as **Exhibit "B."**

8. The similarly wrongful false statements include but are not limited to the following: (a) that Plaintiff is responsible for asbestos pulverizing, dumping and crushing; (b) that Plaintiff is responsible for pumping millions of gallons of toxic water into waterways and the Gulf of Mexico; (c) that Plaintiff is responsible for the release of toxic sulfide gas; (d) that

because of Plaintiff people became sick from toxic sulfide gas; and (e) that because of Plaintiff the Environmental Protection Agency cited Marco Island, Florida.

9. As a result of the False Statements, the Lee County Government terminated Plaintiff's employment.

10. Moreover, as a result of the wrongful conduct described above, Plaintiff suffered loss of income, damage to his reputation, humiliation, embarrassment, and emotional pain and suffering.

11. All conditions precedent have been performed, have been waived, or have occurred prior to the filing of this action.

### **COUNT I**

#### **(Libel *Per Se*)**

12. Plaintiff re-alleges paragraphs 1 through 11 as if set forth fully herein.

13. Defendant SANCHEZ knowingly, or in the alternative, with reckless disregard for the truth, published the foregoing false statements.

14. Further, Defendant SANCHEZ knowingly, or in the alternative, with reckless disregard for the truth, wrote and/or submitted the foregoing statements for publication.

15. Further, Defendant SANCHEZ knowingly, or in the alternative, with reckless disregard for the truth, gave statements to FOX 4 knowing that they would be published.

16. The foregoing false statements were of and concerning Plaintiff.

17. Defendant SANCHEZ made the false statements about Plaintiff for the purpose of harming Plaintiff's reputation and for the purpose of wrongfully interfering with Plaintiff's employment.

18. Defendant SANCHEZ's false and defamatory statements constitute defamation of character/libel *per se*, and, therefore, Plaintiff's damages are presumed. Regardless, as a result of Defendants SANCHEZ's false and defamatory statements, Plaintiff suffered damage to reputation, humiliation, loss of employment, loss of income, loss of dignity, emotional distress, and mental pain and anguish.

WHEREFORE, Plaintiff, ARNON RONY JOEL, demands judgment against Defendant, MARIO SANCHEZ, for damages, plus interest, costs, and such further relief as the Court deems just and necessary.

## COUNT II

### **Slander *Per Se***

19. Plaintiff re-alleges paragraphs 1 through 11 as if set forth fully herein.

20. Defendant SANCHEZ knowingly, or in the alternative, with reckless disregard for the truth, made the foregoing false statements to FOX 4, the Marco Island Sun Times, certain e-mail recipients, certain interest groups, and certain current and/or former residents of Marco Island, Florida.

21. The false statements made by Defendant SANCHEZ were of and concerning Plaintiff.

22. Defendant SANCHEZ made the false statements with the intention of harming Plaintiff's reputation, and interfering with Plaintiff's employment.

23. Defendant SANCHEZ's defamatory statements constitute defamation of character/slander *per se*, and, therefore, Plaintiff's damages are presumed. Regardless, as a result of Defendant SANCHEZ's false and defamatory statements, Plaintiff suffered damage to

reputation, humiliation, loss of employment, loss of income, loss of dignity, emotional distress, and mental pain and anguish.

WHEREFORE, Plaintiff, ARNON RONY JOEL, demands judgment against Defendant, MARIO SANCHEZ, for damages, plus interest, costs, and such further relief as the Court deems just and necessary.

### **COUNT III**

#### **(Tortious Interference with a Business Relationship)**

24. Plaintiff re-alleges paragraphs 1 through 11 as if set forth fully herein.

25. A business relationship existed between Plaintiff and Lee County Government by reason of Plaintiff's employment with Lee County Government, under which Plaintiff had legal rights.

26. Upon information and belief, Defendant SANCHEZ, had knowledge of Plaintiff's business relationship with Lee County Government.

27. Upon information and belief, Defendant SANCHEZ intentionally and unjustifiably interfered with the business relationship that existed between Plaintiff and Lee County Government.

28. Defendant SANCHEZ acted out of ill will and hatred when he made the above false statements about Plaintiff for the purpose and intention of interfering with and ultimately causing the termination of Plaintiff's employment with Lee County Government.

29. Defendant SANCHEZ is a third party to the business relationship that existed between Plaintiff and Lee County Government.

30. As a direct and proximate result of Defendant SANCHEZ's conduct, Plaintiff has suffered damages, including without limitation lost wages and benefits in the past and future, loss of reputation, humiliation, loss of dignity, emotional distress, and mental pain and anguish.

WHEREFORE, Plaintiff, ARNON RONY JOEL, demands judgment against Defendant, MARIO SANCHEZ, for damages, plus interest, costs, and such further relief as the Court deems just and necessary.

#### **COUNT IV**

#### **(Injunctive Relief)**

31. Plaintiff re-alleges paragraphs 1 through 11 as if set forth fully herein.

32. Upon information and belief, Defendant SANCHEZ continues to make false statements about Plaintiff, which Defendant SANCHEZ knows to be false and/or which Defendant SANCHEZ makes with reckless disregard for the truth.

33. Defendant SANCHEZ continues to make false statements about Plaintiff with the intention of causing additional harm to Plaintiff and/or for interfering with Plaintiff's employment and/or potential employment.

34. No adequate remedy at law exists to protect Plaintiff from Defendant SANCHEZ's wrongful conduct.

35. For this reason, Plaintiff seeks a Court Order, enjoining and restraining Defendant SANCHEZ from committing any further acts of libel or slander against Plaintiff, or from directing any other wrongful conduct towards Plaintiff.


WHEREFORE, Plaintiff, ARNON RONY JOEL, prays that the Court enter an Order enjoining and restraining Defendant, MARIO SANCHEZ, and those acting in concert with him, from committing any further acts of libel and/or slander against Plaintiff or from directing any

other wrongful conduct towards Plaintiff, and awarding Plaintiff such further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a jury trial on all issues so triable.

WELDON & ROTHMAN, PL  
7935 Airport-Pulling Road N, Suite 205  
Naples, Florida 34109  
Tel: (239) 262-2141  
Fax: (239) 262-2342

By:   
\_\_\_\_\_  
Bradley P. Rothman  
Florida Bar No.: 0677345  
*Attorney for Plaintiff*

CLASSIFIEDS JOBS CARS REAL ESTATE RENTALS RSS FEEDS CONTACT US SUBSCRIBE ADVERTISE

Home Community News Business Entertainment Opinion Obituaries Photos Sports

Sign up Log in

Find what you are looking for... SEARCH



BMW 2011

SIGN UP NOW FOR THE BMW DRIVE FOR TEAM USA.

LEARN MORE

USA

Legal

ADVERTISEMENT

# Commentary by Mario Sanchez: Perennial pursuit of justice

2:39 PM, Jul. 12, 2011 | Comments

0

AA

Written by **Mario Sanchez**

FILED UNDER

Marco Island Opinion

The famous Nazi hunter Simon Wiesenthal was asked why 60 years after the Holocaust he continued to haunt those responsible. As if dumbfounded by the question, he answered "The history of man is the history of crimes, and history can repeat. So information is a defence. Through this we can build, we must build, a defense against repetition."

Just last month and nearly 30 years after the end of Argentina's Dirty War, where thousands disappeared and many more were tortured, those responsible for the cruelties – who are now octogenarians – were finally put on trial.

Explaining why these trials are now coming to pass, an international human rights organization explained it this way: "Pursue[ing] justice for past abuses, these initiatives are the result of work by victim groups, civil society organizations, and individuals who set up a strong base of information and never stopped their fight for justice."

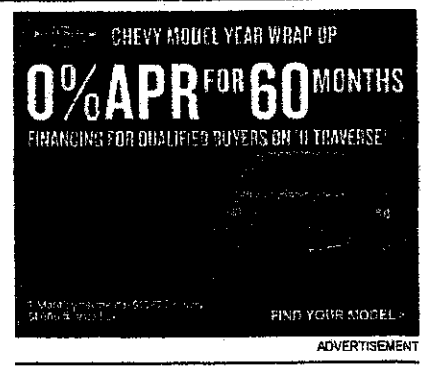
In 1988 President Reagan signed into law the Civil Liberties Act of 1988 that granted reparations to the Japanese and their descendants that were unlawfully interned during World War II – more than 40 years earlier.

There is even now a movement seeking reparations for the descendants of American slaves. Despite how irrational this pursuit may seem, a federal appeals court has ruled that the case can go forward if the plaintiffs can in part "prove the violation despite its antiquity."

It seems as if when it comes to justice and exposing those responsible for violating the rule of law, there is no time limit by virtue of the people willing to keep the pursuit of justice alive.

And so shall it be here on Marco Island.

This past week, the acts and consequences of an aberrant decreed policy came back to haunt the city's former public works director. When an astute investigative reporter questioned the manner by



CHEVY MODEL YEAR WRAP UP

0% APR FOR 60 MONTHS

FINANCING FOR QUALIFIED BUYERS ON '11 TRAVOSE

ADVERTISEMENT

### TOP STORIES

- Marco restaurant ventures into computer business - 4:34 PM, Jul. 14, 2011
  - Homeowners report savings with cisterns
  - Marco's revised 2010 taxable property values down 8.08 percent
- SEE ALL TOP STORIES

### MOST POPULAR

1. Marco restaurant ventures into computer business
2. Homeowners report savings with cisterns
3. Marco's revised 2010 taxable property values down 8.08 percent
4. Marco nightlife
5. Loving Ingrid: Prologue



Marco top photos so far

### MOST COMMENTED

- Homeowners report savings with cisterns 1



which the former director was being hired by yet another public entity, he did a rudimentarily trivial search on the Internet.

A plethora of issues that occurred during said public works director's tenure on Marco Island came to light; The dumping, crushing and pulverizing of asbestos-containing material – less than one mile from two schools, as well as the dumping of toxic effluent into the waterways and on front lawns, as well as the documented report of people becoming ill from toxic gases, as well as the building and installing of a Rube Goldberg contraption as a ruse, as well as the faux investigation of septuagenarians fraudulently accused of dumping tons of asbestos pipe fragments, as well as the genuine federal criminal investigation and subsequent findings by the EPA that the Clean Water Act and Clean Air Act were violated, as well as the sworn depositions that did not match reality, as well as the Machiavellian tactics by current and former "staff" as well — interminable list of abuses all quickly materialized.



Page 1 2 Next

**View Comments | Share your thoughts »**

**YOU MIGHT BE INTERESTED IN**

Half-day and a hook: Why was man fired?

Marco Police Chief Thom Carr resigns

Chefs' Express closes at Shops of Olde Marco

Cruise: NCL to offer pizza delivery 24/7

Islanders witness heart-rending ocean refugee drama

**SPONSORED LINKS** What's this?

Inside Islam: What a Billion Muslims Really Think (SnagFilms)

Mark Madoff Found Dead (The Daily Beast)

What?! Prince in foreclosure?! (BankRate.com)

Rupert Murdoch: The Movie (Moviefone)

Potentially Dangerous Places For US Tourists (CNBC)

ADVERTISEMENT

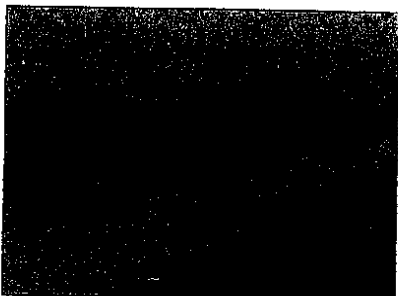
**REAL DEALS**



Flip, shop and save on specials from your favorite retailers on Marco Island

**GET DEALS NOW**

**MARCO BEACH CAM**



**FUN & GAMES**



Crosswords, Sudoku, card games and more!

**READER FORUMS**

SEE ALL FORUMS

**From:** [mariodbig@gmail.com](mailto:mariodbig@gmail.com) [mailto:[mariodbig@gmail.com](mailto:mariodbig@gmail.com)] **On Behalf Of** Dr. Mario Sánchez

**Sent:** Friday, August 19, 2011 10:54 AM

**To:** Dr. Mario Sanchez

**Subject:** lying continues

dear patriots,

fox4 news will air an update this monday 8/22/2011 at 10pm on the joel expose they did a few weeks ago.

it appears that joel is threatening with what appears to be obfuscation and the customary plausible deniability. namely, he is not responsible for the asbestos pulverizing and dumping and crushing (it was fiberglass anyway), he is not responsible for pumping millions of gallons of toxic water into the waterways and gulf of mexico, he is not responsible for the release of toxic hydrogen sulfide gas, that no one became sick from the gas, that the epa did not cite the city, and on and on and on.

why is this important now that most people either left or just dont care? because most people are still complaining about how the city governance is ... governing. its the same syndicate, different puppets. if you have any dreams of expunging the city from the syndicate, watch this episode, contact all of your "friends" to watch and more importantly have as many people as possible write fox4 with what happened, with what you saw happening.

here is yet another opportunity to expose what happened so that justice can come down (hard) on all of those responsible - no matter how much they deny their involvement or responsibility.

mario