

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

GENERAL JURISDICTION DIVISION

CASE NO.:

MICHAEL MOTA,

Plaintiff,

v.

THE BOSTON GLOBE
and AMANDA MILKOVITS,

Defendants.
_____ /

COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

The Plaintiff, MICHAEL MOTA, through his counsel, hereby serves his Complaint for Damages against the Defendants, THE BOSTON GLOBE and AMANDA MILKOVITS, and alleges as follows:

Jurisdiction, Venue, and the Parties

1. This is a civil action for damages in excess of Fifty Thousand U.S. Dollars (\$50,000) exclusive of interest, attorneys' fees, and costs.
2. MICHAEL MOTA is an individual who resides in Providence County, Rhode Island and is *sui juris*. He is a citizen of Rhode Island.
3. AMANDA MILKOVITS is an individual who resides in Rhode Island, and she is *sui juris*. She is a citizen of Rhode Island.
4. THE BOSTON GLOBE (hereinafter referred to as the "Boston Globe"), is a corporation organized under the laws of Rhode Island which publishes its stories throughout the State of Florida including Palm Beach County, Florida. It is a citizen of Massachusetts. The

Boston Globe is an American daily newspaper who has a local paper in Rhode Island. The Boston Globe is subject to personal jurisdiction in the State of Florida pursuant to Fla. Stat. § 48.193(1)(a)(2), as it committed intentional tortious acts within the State of Florida.

5. Venue is proper within Palm Beach County pursuant to Fla. Stat. § 47.011, as the causes of action underlying this matter occurred in Palm Beach County, Florida.

Prefatory Statement

6. Mr. Mota is a successful real estate developer and entrepreneur who resides in Rhode Island, making deals from Rhode Island to Southern Florida. Mr. Mota's business repertoire includes other reputable ventures, including convention organization, large scale event and promotion, restaurant and venue operations, and creating businesses.

7. Over the years, Mr. Mota has involved himself with several companies, such as Media Peel, Alex and Ani, Atom Media Group, Skyline at Waterplace, VirtualCons (short for Virtual Conventions), and Bayport International Holdings.

8. The Boston Globe is a well-established newspaper with local publications in places such as Rhode Island; by leveraging the internet, the Boston Globe has a broad reach, and it publishes its articles for the whole country.

9. For reasons unknown, Mr. Mota has been the focus of numerous false and exaggerated stories which unfairly and tortiously malign him. These are all written by a staff member of the Boston Globe, Amanda Milkovits. Ms. Milkovitz has an agenda to destroy Mr. Mota, and has followed, stalked, investigated, and written 17 libelous stories in a 6 month timeframe about Mr. Mota primarily in Florida and Rhode Island.

10. All predicate acts which are required to bring the above styled action have been done or were waived by the Defendants.

Factual Background

11. Since March of 2023, the Boston Globe, through Mrs. Milkovits, has produced a

litany of baseless and damaging articles about Mr. Mota's character, his business ventures, and his livelihood.

12. The first article which Ms. Milkovit aimed at Mr. Mota was published by the Boston Globe on March 17, 2023, and it sold copies of its Newspaper across the nation, including in Palm Beach County, Florida. The article, titled "Michael Mota and the Art of the VirtualCon," falsely painted Mr. Mota as a con artist and a "mob enthusiast" whose company had not paid its rent to the city of Providence for months.

13. The Defendants falsely accused Bayport International Holdings, one of Mr. Mota's companies, of being "a defunct company," and falsely reported and published that "Its stock is worthless, a pump and dump and that it cannot be traded in the United States."

14. The Defendants then falsely stated that "A judge in Providence County Superior Court is threatening to throw him in jail."

15. The Defendants continued their unwarranted campaign against Mr. Mota by publishing seventeen (17) articles over the course of less than 6 months of which Thirteen (13) are the basis of the present lawsuit. During that time, the Defendants made countless false statements or statements which implied a false narrative aimed at destroying Mr. Mota's reputation. The false statements are now set out, one by one, as follows:

Michael Mota and the Art of the VirtualCon

By Amanda Milkovits, Globe Staff, Updated March 17, 2023.

1. [Mr. Mota] now calls himself a former vice president of marketing for Alex and Ani, and sometimes a former vice president of business development for the jewelry company. But court documents show that, while he was a vice president at the marketing subsidiary, he never held that title at Alex and Ani.

2. Skyline hadn't paid its rent to the city of Providence for months, city officials say, and there's no record that Mota made renovations that were promised in exchange for avoiding rent for nearly three years.

3. Bayport International Holdings is a defunct company. Its

stock is worthless, industry analysts say.

4. Mota's doctorate comes from a diploma mill that provides honorary degrees for a price, the Globe's research found.

5. His work at Alex and Ani has been exaggerated — the company's founder told the Globe he never served as its vice president.

6. A judge in Providence County Superior Court is threatening to throw him in jail for blowing off payment agreements in one case.

7. His second-floor office on Douglas Pike in Smithfield is filled with memorabilia glorifying mobsters.

8. He tagged along when Alex and Ani founder Carolyn Rafaelian was invited to meet the Dalai Lama at Brown University in October 2012, and got his own photo with the spiritual leader. It hangs on the wall next to his mob pictures.

9. The company also alleged in its court filing that Mota falsely claimed to be Alex and Ani's CEO, took lavish gifts from clients, and racked up \$32,000 in dining expenses on the corporate credit card.

10. City officials quickly determined that his plan wasn't even remotely feasible. Meanwhile, Skyline was foundering.

11. Mota was trying to run the events business, but he was falling behind on the rent.

12. Mota's company eventually fixed the fire code issues and paid the rent, but as of March 15, the venue's taxes were still unpaid. Its licenses are suspended, the doors still closed. And Skyline is for sale.

13. A housing spokesman reiterated that stance in a Feb. 22 interview with the Globe, but last week, staff and attorneys who work for new Housing Secretary Stefan Pryor visited Memorial Hospital and discussed having Amos House return.

14. A few weeks later, Mota launched his own mob-themed cryptocurrency, VirtualCoin, \$VCON . . .

15. Mota then told coin-holders that the coin could be used only to buy things through VirtualCons. . .

16. Mota admitted to the Globe that the video of his brother-in-law "making history" using Virtual Coins to buy a used car was just

“what we’re going to do.” In other words, it was staged. [Implies that Mota was defrauding viewers.]

17. “Gotti 2” never went into production.

18. Bayport’s stock is currently worth a penny or less per share and can’t be bought or sold in the United States, according to OTC Markets Group.

19. Mota has “attempted to absolve himself of responsibility to his investors by giving them stock in a public company that should be considered a corpse,” said George Sharp, a former consultant to OTC Markets Group and an antifraud advocate who has advised on federal investigations.

20. Mota is accused in multiple lawsuits of not paying banks and vendors involved in his various businesses. In Rhode Island, Mota is being chased for money for Skyline at Waterplace and for Lola’s Lounge, a Mexican restaurant in Smithfield that Mota briefly operated during the pandemic.

21. Russell Morin Catering of Attleboro, Mass., had built out the kitchen at Skyline and paid for the equipment, as the venue’s exclusive caterer, general manager R.J. Morin told the Globe. [Implication of theft.]

22. A charity to benefit the children of fallen first responders told the Globe that while Mota personally donated \$600, the First Responders Children’s Foundation never received the money Mota said he raised through SopranosCon Cares. That’s what prompted Giacomazzo to angrily cut ties with Mota. [This implies that other monies which were to be given to benefit children were stolen by Mr. Mota. In fact, all that was raised was the \$600 which Mr. Mota paid.] [Also, Giacomazzo was fired long before so that statement is false.]

Michael Mota, CEO of VirtualCons, is being sued by Harrah’s for \$274,000

By Amanda Milkovits, Globe Staff, Updated March 23, 2023.

1. Michael A. Mota, whose entertainment company VirtualCons held popular conventions celebrating “The Sopranos” and Hollywood mobsters, is being sued by Harrah’s Resort Atlantic City over a mob-themed convention he held there in 2021.

2. This is the latest lawsuit filed against Mota, a Rhode Island businessman and mob enthusiast who is being chased for money in multiple states by creditors, investors, and vendors, according to

a Globe investigation. This lawsuit brings the total that Mota is accused of owing to about \$750,000.

3. The Gotti movie still hasn't gone into production, and some vendors said they weren't paid for the event.

4. Mota has been pushing for state officials to award him grants and other financial support for a \$50 million to \$90 million renovation of the former Memorial Hospital in Pawtucket, saying he represents the owner of the property. [Mr. Mota was part of the ownership group and the implication that he was not representing the owners is not true. He never pushed for a grant or other financing.]

Pawtucket's Memorial Hospital is worth 'negative \$6 million,' court filings show

By Alexa Gagosz and Amanda Milkovits Globe Staff, Updated April 5, 2023.

1. Pawtucket's Memorial Hospital is worth 'negative \$6 million,' court filings show.

2. Mota is the CEO of VirtualCons, a mob-themed convention and entertainment company, and the president of Bayport International Holdings, a Florida-based company that he claimed was connected to Lockwood. Bayport is labeled "buyer beware" by the OTC Markets with additional labels about limited disclosure of financial information. A Globe investigation found that Mota is being chased for money in multiple states by creditors, investors, and vendors who did business with his various companies.

3. Although he had no experience in developing property, Mota told the state housing department that he could fix problems caused by the water leak quickly, and would have the site working as an emergency homeless center again by Jan. 1. Text messages and emails obtained by the Globe show Mota pushing then-Housing Secretary Josh Saal and other state officials for public funding for the project.

Providence moves to evict Michael Mota's Skyline at Waterplace

By Amanda Milkovits Globe Staff, Updated April 6, 2023.

1. The city filed a complaint in District Court, giving Mota's company until May 4 to show evidence that they did the work they'd promised. Otherwise, the city will seek to have them pay back 32 months of rent, totaling more than \$270,000.

2. Mota is also the CEO of VirtualCons, a Hollywood mobster-themed entertainment and cryptocurrency company, and president

of Bayport International Holdings, a Florida-based public company listed as “buyer beware” by the OTC Markets.

3. The city of Providence is not the only entity seeking money from Mota. A recent Globe investigation found that investors, vendors, and creditors who’ve done business with Mota’s various companies are chasing him for money, with 11 lawsuits totaling more than \$775,000.

R.I. housing department: We are ‘notworking to get Amos House back into Memorial as a shelter’

By Amanda Milkovits and Alexa Gagosz Globe Staff, Updated April 20, 2023.

1. Memorial Real Estate Group, a company founded by R.I. businessman Michael Mota, announced this week that it has renovated part of the former hospital building in Pawtucket for use by Amos House. But the state’s housing department and the homeless services provider both say they are not working with Mota on the project.

2. Emails obtained by the Globe through a public records request show that state housing officials and Amos House were considering plans to redevelop the former hospital with Mota as recently as March 30 — despite concerns about the ownership of the building, a doctrine of cy pres limiting the building’s use, and accusations that Mota and his companies owe nearly \$750,000 to creditors and vendors in multiple states.

3. But a spokesman for the housing department told the Globe on April 13, “We have never had and do not have any arrangement with Mota and Ricci. For homeless providers including Amos House, we are currently searching for new locations for shelter beds.”

4. Eileen Hayes, executive director of Amos House, confirmed to the Globe on Thursday: “Amos House is not going to be renting the space at Memorial.”

5. The city has provided inspections and permits, she said, but has never been presented with an official plan by MREG. “While we do support the proper redevelopment of the former hospital,” she said, “Mr. Mota’s claim that we support his specific plan ‘100%’ is inaccurate.”

6. “Is Housing working with Mike Mota? No,” Sheaff added.

7. Mota is also the CEO of VirtualCons, his Hollywood-mobster themed entertainment and cryptocurrency company, as well as the president of Bayport International Holdings, a Florida-based real estate, technology, and entertainment company that acquired VirtualCons in September 2022.

8. A stop work order issued by the city on March 22 for lack of permits and unauthorized demolition was lifted on March 30.

City of Pawtucket supports Attorney General’s intervention on Memorial Hospital

By Amanda Milkovits Globe Staff, Updated April 21, 2023.

1. “The Mayor and members of our planning and zoning department have had preliminary conversations with Mr. Mota regarding his vision for redeveloping Memorial Hospital, as we would out of courtesy with any potential developer for the city. However, no official plan has been presented,” she said in a statement. “The City’s role has been and will continue to be providing inspections and permits. As long as Mr. Mota has adhered to the expectations of those permits, we have provided them. While we do support the proper redevelopment of the former hospital, Mr. Mota’s claim that we support his specific plan ‘100%’ is inaccurate.”

2. Despite MREG’s announcement this week that the former Memorial Hospital is “in move-in condition” to house homeless families, state housing officials and the executive director at Amos House said Thursday that they aren’t moving forward “under current management.”

‘It’s devastating’: Florida questioning Michael Mota after resort’s protected mangrove trees chopped down

By Amanda Milkovits Globe Staff, Updated June 2, 2023.

1. It’s devastating’: Florida questioning Michael Mota after resort’s protected mangrove trees chopped down.

2. Rhode Island entrepreneur Michael A. Mota is being questioned by authorities in their investigation into the destruction of 17,789 square feet of protected mangroves at the resort.

3. Rhode Island entrepreneur and Hollywood mobster enthusiast Michael A. Mota is being questioned by Florida authorities who are investigating the clearcutting of protected mangroves at a resort in Port St. Lucie.

4. When inspectors got access to the property two days later, on May 10, more than 17,800 square feet of the red and black mangroves along the St. Lucie River were cut to the ground. Some were more than 24 feet tall.

5. When DEP staff returned to the resort for a follow-up investigation on May 17, they met with a property manager and Mota, who was a representative of the owner, according to a DEP inspection report.

6. Mota is the CEO of Hollywood mobster entertainment company VirtualCons in Rhode Island and the president of Bayport International Holdings, a Florida-based public company listed as “buyer beware” by the OTC Markets. He is being chased for money by creditors, vendors, and investors in VirtualCons and his cryptocurrency, VirtualCoin.

7. Until recently, Mota was also leading the development of the former Memorial Hospital in Pawtucket, where he unsuccessfully attempted to get Amos House to sign a \$120,000-a-month lease for a homeless shelter.

8. He has been the longtime CEO of Skyline at Waterplace, an event venue in downtown Providence; city officials are trying to evict the company.

9. It’s unclear what storm Mota is referring to. According to the National Weather Service, the last tornadoes in St. Lucie County were in June 2022, more than 25 miles away from the resort, and caused no damage.

Providence continues to push to evict Skyline from Waterplace Park

By Amanda Milkovits Globe Staff, Updated July 10, 2023.

1. Mota is also the founder and CEO of VirtualCons, an entertainment and cryptocurrency company, and the president of Bayport International Holdings, a public company labeled “buyer beware” by the OTC Markets. Investors, vendors, and creditors who’ve done business with Mota’s various companies, including VirtualCons, are chasing him for money in several states.

Michael Mota, VirtualCons’ attempts to silence critics may violate R.I. free speech laws

By Amanda Milkovits Globe Staff, Updated July 17, 2023.

1. Rhode Island entrepreneur Michael A. Mota, whose business dealings were the subject of a Globe investigation, has been using threats of legal action to try to silence those who speak out against him, according to letters shared with the Globe, as well as e-mails and statements made directly to the Globe.

2. They range from cryptocurrency, NFTs, and movies and conventions celebrating Hollywood mobsters to boxing matches, restaurants, and real estate development deals in Rhode Island and Florida. Lawsuits against Mota, nearly all of which he's defaulted on, currently total more than \$775,000.

Homelessness in Rhode Island

By Amanda Milkovits Globe Staff, Updated July 24, 2023.

1. Emails obtained by the Globe through a public records request show that state housing officials and Amos House were considering plans to redevelop the former hospital with Mota as recently as March 30 — despite concerns about the ownership of the building, a doctrine of cy pres limiting the building's use, and accusations that Mota and his companies owe nearly \$750,000 to creditors and vendors in multiple states.

2. On March 30, the Globe found that the Rhode Island Department of Labor and Training is looking into potential labor law violations at the construction site

3. Michael Mota under scrutiny for potential labor law violations, ordered to stop work at Memorial Hospital.

4. . . . the City of Pawtucket has ordered all work on the site to stop as of March 22.

5. The site is being run by Michael A. Mota, a Rhode Island businessman who is being chased for money in multiple states by creditors, investors, and vendors who did business with his various companies, according to a Globe investigation.

6. Mota is the CEO and founder of VirtualCons, an entertainment company focused on shows about mobsters, such as "The Sopranos" -- his passion.

7. He is also the president of Bayport International Holdings, a Florida-based public company considered defunct and labeled "buyer beware" by the OTC Markets.

8. A recent Boston Globe investigation found that Mota is being sued by creditors and vendors in 10 lawsuits totaling more than \$500,000.

9. As CEO of Skyline at Waterplace in Providence, Mota's company has been months late with rent payments to the city of Providence, and was temporarily closed for not paying taxes.

Florida company may be fined \$110k for clear-cutting protected mangrove trees

By Amanda Milkovits Globe Staff, Updated December 11, 2023.

1. Rhode Island entrepreneur Michael A. Mota was representing the resort's owner when the DEP launched its investigation into the clearcutting at Sandpiper Bay resort in mid-May. The inspectors found that 17,789 square feet of healthy, mature mangroves were chopped down without a valid permit.
2. Mota and the property manager had told the DEP staff "that the reasoning behind the mangrove removal/cutting was because of a tornado that had impacted the mangroves," according to a DEP inspection report.
3. Mota is president of a Florida-based public company, Bayport International Holdings, and CEO of VirtualCons, a company that holds Hollywood mobster conventions and launched its own cryptocurrency.
4. He is CEO at Skyline at Waterplace, a venue in downtown Providence, which is fighting an eviction. He has also led a group in a so-far unsuccessful attempt to foreclose on the former Memorial Hospital in Pawtucket to turn the property into veterans' housing and affordable housing.

Claims made to OTC Markets misstate Memorial Hospital development plans

By Amanda Milkovits Globe Staff, Updated December 13, 2023.

1. According to court records, the property has not undergone a foreclosure of any kind. There is no certificate of occupancy and no official plan for Mayor Donald Grebien to support.
2. There is no evidence the property is entitled to nearly \$20 million in state and federal historic tax credits, as Bayport claims. The Historical Preservation and Heritage Commission never got an application from Bayport describing the proposed project, so it can't allocate any amount of money for federal tax credits. There's also no agreement between Bayport and the state Division of Taxation.
3. Basically, neither Bayport nor Memorial Real Estate Group LLC have any claim to the former hospital property. Memorial Real Estate Group is no longer active.
4. Bayport, which has a reputation as a pump-and-dump scheme, was previously disciplined.

5. Bayport is labeled “buyer beware” on the OTC Markets; its shares are worth a fraction of a penny, and can’t be traded in the United States.

6. VirtualCons investors were given shares in Bayport -- but the shares, the app, and \$VCon are unusable.

7. A Globe investigation in March found that Mota is being chased for money by creditors and vendors in multiple states for his business dealings.

8. The city of Providence is also trying to evict Mota’s company, Skyline at Waterplace LLC, from its downtown venue for complaints of late rent payments, fire code violations, and poor maintenance of the property. Skyline is appealing the eviction; a trial is scheduled for Dec. 15.

16. The thrust of the articles falsely accuse or imply that Mr. Mota was dealing with or worshipping mobsters. The Defendants accuse him of associating with “Hollywood mobsters.” Although the intention may have appeared to have been to indicate Hollywood fictional mob characters, this is not what was said. Moreover, in some articles the Defendants describe him as having memorabilia glorifying mobsters, not fictional characters or actors, but “mobsters.” The even state that he has “mob pictures” which he hangs on his wall.

17. They demean him with little lies as well as big ones to smear him, for no reason other than to enhance the career of fiction writer, AMANDA MILKOVITS, who masquerades as an authentic news reporter. For instance, it was Mr. Mota who was invited to meet the Dalai Lama whose picture hangs on his wall, supposedly next to mob pictures.

18. The Defendants attempt to make him look like a liar, stating that he was never the vice president he claims to have been of vice president of marketing for Alex and Ani. They falsely reported that he was not, implying that Mr. Mota is a liar and a con artist who exaggerated his position even after they knew that the former CEO, CFO and Vice President of Human Resources were on record stating that as fact.

19. Knowing that he is not the owner of Skyline, they repeatedly accused him of being

responsible for a lack of payment of rent and taxes, which had, in fact, been paid.

20. After the Defendants reported the lies stated above, Mr. Mota found his family's company, Skyline at Waterplace, being evicted because the City no longer wanted to work with Mr. Mota. Moreover, after months of work, totaling \$600,000, and beds were being moved into the facility, Amos House decided to not move into the homeless shelter work. This caused a loss to Mr. Mota. Also, after Mr. Mota's partners were told that the state would not work with Mr. Mota, and the false story hit the cover of the Boston Globe, Mr. Mota lost out on the eventual sale of Memorial Hospital.

21. Skyline at Waterplace had 13 years remaining on their lease and was bringing in over \$2 million per year and after the story went to \$0. Memorial Hospital was to be a Veterans and Affordable Housing Campus that had a value well over \$100 million after completion. Mr. Mota had to sell his shares as the state relied on false reporting to stall the project.

22. The Defendants accuse VirtualCons of being a "Hollywood mobster-themed" entertainment company. The company, among other things, arranges conventions regardless of subject matter. No conventions were "Hollywood mobster-themed," but rather some conventions are themed after certain TV shows, such as "The Sopranos." The difference between honoring and associating with actual members of a criminal enterprise, which the word "Mob" means in our modern lexicon, and honoring and associating with actors, directors, and producers of the TV and Movie entertainment industry are as different as day and night. Yet, the Defendants used this false spin to imply that Mr. Mota is in some way a part of organized crime.

23. Over and over again, the Defendants accuse Mr. Mota of being chased by debtors and having debts amounting to \$750,000. This is unfounded and untrue.

24. One of the most awful implications the Defendants made was in regard to the \$600.00 which Mr. Mota had given to the First Responders Children's Foundation. In fact, as little as it may have seemed, the \$600 was all of the money raised through SopranosCon Cares and

it was made on behalf of SopranosCon Cares by Mr. Mota. Instead of reporting the truth, the Defendants implied that Mr. Mota was one of the kind of miscreants who raise money which was supposed to benefit children, and that he stole the funds for himself.

25. Repeatedly, the Defendants reported and published that Bayport International Holdings, a company where Mr. Mota held the position of President, was a defunct company notwithstanding that it is not defunct and completely operational.

26. The repeated references to Amos House is also false. The only reason that Amos House stopped working with Mr. Mota, was because of the stories by the Defendants. The implication that Mr. Mota was not working with them was false when first reported, but it became real due to the reporting, causing harm to Mr. Mota. Amos House had already moved in beds and belongings to the over 50 people and children that were displaced at Memorial Hospital after a water leak. In fact, it was days after the article being released that Eileen Hayes of Amos House abruptly decided not to move back after Mr. Mota and his company spent \$600,000 in renovations and Eileen Hayes posted the article on her personal Facebook page.

27. Perhaps the most damaging of all of the libelous articles published across the nation, against Mr. Mota had to do with the Sandpiper Bay resort's cutting of mangroves. Those articles cost Mr. Mota a contract and a major share of the resort in question.

28. The Defendants falsely reported that Michael Mota was under investigation. Moreover, when combined with the other statements relating to the Sandpiper Bay resort's cutting of the mangroves, the statement is libel by implication in that it together with the other related statements implied that Mr. Mota had some involvement, or that there was some suspicion or accusations against Mr. Mota for either participating in the cutting or being responsible in some way for the cutting of the mangroves. At no time did Mr. Mota get questioned. Also, he was not involved in the investigation. The Defendant was advised of this and still decided to write the article, demonstrating malice.

29. The statement that Mr. Mota had been investigated by Florida authorities into the destruction of 17,789 square feet of protected mangroves at the resort was false. Moreover, the Resort used the excuse that the mangroves had been damaged due to a tornado which had hit them. In support of its effort to untruthfully malign Mr. Mota, the Defendants falsely advised that there had been no such weather events within 25 miles from the mangroves. This was false.

30. Furthermore, the Defendant, Amanda Milkovits, reached out to the management of the company involved in the cutting of the mangroves and attempted to convince them to change their story to match her narrative. After the company would not stray from the truth, that Mr. Mota was not involved in any part of the mangrove cutting, she included their story. This is not the first time the defendant used tactics of trying to convince people to change their story to go along her fictional version of the truth.

31. The defamatory statements were publicized on a worldwide scale. By virtue of the Boston Globe's renown as a worldwide news source and the licentious nature of the articles, the public took an interest in Mr. Mota.

32. The false and malicious statements caused substantial, irreparable harm to Mr. Mota's reputation in full view of a substantial, sizable, and appreciable fraction of the relevant community, causing him great anxiety and emotional distress.

33. As a direct result of the Defendants' false and defamatory statements, Mr. Mota lost multiple business opportunities, and his reputation has been so damaged that he is routinely overlooked for business opportunities based on the malicious articles from the Defendants.

34. Specifically, two articles recently published by the Defendants, titled "*It's devastating': Florida questioning Michael Mota after resort's protected mangrove trees chopped down,*" and "*Florida company may be fined \$110k for clear-cutting protected mangrove trees,*" caused Mr. Mota's business partner, Kieth Lee, to remove Mr. Mota from a development project involving the Sandpiper Bay Resort, which would have given a great financial benefit to Mr. Mota.

Count I - Defamation

35. The Plaintiff avers the allegations in Paragraphs 1 through 34, above, and incorporates them by reference as though they are fully rewritten in this count.

36. The Defendants published numerous false written statements of fact about Mr. Mota, as listed in Paragraph 15, which were seen across the country including the State of Florida.

37. The written statements of fact published by the Defendants were false.

38. The Defendants published the articles which were false with knowledge of their falsity or with a reckless disregard as to the falsity of the matters they published.

39. Mr. Mota was not a public figure until the Defendants pursued their vendetta to cause him embarrassment and humiliation by publishing the articles that they published.

40. Mr. Mota suffered actual damages as is described above, as well as the public humiliation, the harm which was caused to his relationships with business associates and even friends. He suffered mental anguish and distress, and has lost ability to enjoy life.

41. Moreover, the articles published by the Defendants caused harm to Mr. Mota's reputation in his communities in business and in his social life by lowering him in the estimation of the community. The published articles exposed Mr. Mota to hatred, ridicule, contempt, and injured his business, his occupation, and his general social community.

42. The Defendants' false written statements of fact were defamatory.

43. At the time the statements were made, the Defendants acted with the knowledge that these statements were false, and/or they had reckless disregard as to the falsity concerning Mr. Mota, a private individual.

44. The false and defamatory statements prejudiced, harmed, and otherwise injured Mr. Mota's reputation, and resulted in the loss of money and business opportunities.

WHEREFORE, the Plaintiff, Michael Mota, demands judgment for compensatory damages against the Defendants, The Boston Globe, and Amanda Milkovits, together with

interest and costs, and for such further and other relief as this Honorable Court may deem just and proper.

Count II - Injurious Falsehood

45. The Plaintiff avers the allegations in Paragraphs 1 through 34, above, and incorporates them by reference as though they are fully rewritten herein.

46. The Defendants published two injurious articles titled “‘It’s devastating’: Florida questioning Michael Mota after resort’s protected mangrove trees chopped down,” and “Florida company may be fined \$110k for clear-cutting protected mangrove trees” which were disseminated worldwide.

47. The Defendants’ articles allege that Mr. Mota was questioned about the destruction of protected trees, and insinuated he was under investigation.

48. Despite knowing its statements were false, the Defendants spread this false information to third parties to impair the credibility of Mr. Mota, so that it may destroy any chance of conducting any future business.

49. As an entrepreneur, Mr. Mota lost business from these false and defamatory statements as the public believes he is irresponsible, untrustworthy, and a scam artist.

50. The articles caused Mr. Mota’s business partner, Kieth Lee, to remove Mr. Mota from a development project involving the Sandpiper Bay Resort, which would have netted Mr. Mota a share in the Sandpiper Bay Resort.

51. The articles also Amos House to not move into the homeless shelter work, ultimately causing further loss to Mr. Mota caused Moreover, after months of work, totaling \$600,000.

52. Also, after Mr. Mota’s partners were told that the state would not work with Mr. Mota, and the false story hit the cover of the Boston Globe, Mr. Mota lost out on the eventual sale of Memorial Hospital. Memorial Hospital was to be a Veterans and Affordable Housing Campus

that had a value well over \$100 million after completion. Mr. Mota had to sell his shares as the state relied on false reporting to stall the project.

53. The articles also caused Mr. Mota's family's company, Skyline at Waterplace, to be evicted. Skyline at Waterplace had 13 years remaining on their lease and was bringing in over \$2 million per year and after the story went to \$0.

54. As a direct result of the Defendants' acts, irreparable injured Mr. Mota's reputation, business, prestige, and goodwill.

WHEREFORE, the Plaintiff, Michael Mota, demands judgment for compensatory damages against the Defendants, The Boston Globe, and Amanda Milkovits, together with interest and costs, and for such further and other relief as this Honorable Court may deem just and proper.

Count III - Defamation by Implication

55. The Plaintiff avers the allegations in Paragraphs 1 through 34, above, and incorporates them by reference as though they are fully rewritten herein.

56. The Defendants published numerous false suggestions, impressions and implications arising from otherwise truthful statements in regard to Mr. Mota, which were seen across the country and in the State of Florida, including but not limited to the following:

Michael Mota and the Art of the VirtualCon

By Amanda Milkovits, Globe Staff, Updated March 17, 2023.

1. Bayport International Holdings is a defunct company. Its stock is worthless, industry analysts say.
2. Mota's doctorate comes from a diploma mill that provides honorary degrees for a price, the Globe's research found.
3. His second-floor office on Douglas Pike in Smithfield is filled with memorabilia glorifying mobsters.
4. He tagged along when Alex and Ani founder Carolyn Rafaelian was invited to meet the Dalai Lama at Brown University in October 2012, and got his own photo with the spiritual leader. It hangs on the wall next to his mob pictures.

5. A few weeks later, Mota launched his own mob-themed cryptocurrency, VirtualCoin, \$VCON . . .

6. Mota admitted to the Globe that the video of his brother-in-law “making history” using Virtual Coins to buy a used car was just “what we’re going to do.” In other words, it was staged.

7. Bayport’s stock is currently worth a penny or less per share and can’t be bought or sold in the United States, according to OTC Markets Group.

8. Mota is accused in multiple lawsuits of not paying banks and vendors involved in his various businesses. In Rhode Island, Mota is being chased for money for Skyline at Waterplace and for Lola’s Lounge, a Mexican restaurant in Smithfield that Mota briefly operated during the pandemic.

9. A charity to benefit the children of fallen first responders told the Globe that while Mota personally donated \$600, the First Responders Children’s Foundation never received the money Mota said he raised through SopranosCon Cares. That’s what prompted Giacomazzo to angrily cut ties with Mota.

Michael Mota, CEO of VirtualCons, is being sued by Harrah’s for \$274,000

By Amanda Milkovits, Globe Staff, Updated March 23, 2023.

1. This is the latest lawsuit filed against Mota, a Rhode Island businessman and mob enthusiast who is being chased for money in multiple states by creditors, investors, and vendors, according to a Globe investigation. This lawsuit brings the total that Mota is accused of owing to about \$750,000.

2. Mota has been pushing for state officials to award him grants and other financial support for a \$50 million to \$90 million renovation of the former Memorial Hospital in Pawtucket, saying he represents the owner of the property

Providence moves to evict Michael Mota’s Skyline at Waterplace

By Amanda Milkovits Globe Staff, Updated April 6, 2023.

1. Mota is also the CEO of VirtualCons, a Hollywood mobster-themed entertainment and cryptocurrency company, and president of Bayport International Holdings, a Florida-based public company listed as “buyer beware” by the OTC Markets.

2. The city of Providence is not the only entity seeking money from Mota. A recent Globe investigation found that investors, vendors, and creditors who’ve done business with Mota’s various

companies are chasing him for money, with 11 lawsuits totaling more than \$775,000.

R.I. housing department: We are ‘networking to get Amos House back into Memorial as a shelter’

By Amanda Milkovits and Alexa Gagosz Globe Staff, Updated April 20, 2023.

1. Memorial Real Estate Group, a company founded by R.I. businessman Michael Mota, announced this week that it has renovated part of the former hospital building in Pawtucket for use by Amos House. But the state’s housing department and the homeless services provider both say they are not working with Mota on the project.

2. Mota is also the CEO of VirtualCons, his Hollywood-mobster themed entertainment and cryptocurrency company, as well as the president of Bayport International Holdings, a Florida-based real estate, technology, and entertainment company that acquired VirtualCons in September 2022.

‘It’s devastating’: Florida questioning Michael Mota after resort’s protected mangrove trees chopped down

By Amanda Milkovits Globe Staff, Updated June 2, 2023.

1. Rhode Island entrepreneur Michael A. Mota is being questioned by authorities in their investigation into the destruction of 17,789 square feet of protected mangroves at the resort.

2. Rhode Island entrepreneur and Hollywood mobster enthusiast Michael A. Mota is being questioned by Florida authorities who are investigating the clearcutting of protected mangroves at a resort in Port St. Lucie.

3. When DEP staff returned to the resort for a follow-up investigation on May 17, they met with a property manager and Mota, who was a representative of the owner, according to a DEP inspection report.

4. It’s unclear what storm Mota is referring to. According to the National Weather Service, the last tornadoes in St. Lucie County were in June 2022, more than 25 miles away from the resort, and caused no damage.

Florida company may be fined \$110k for clear-cutting protected mangrove trees

By Amanda Milkovits Globe Staff, Updated December 11, 2023.

1. Rhode Island entrepreneur Michael A. Mota was representing the resort's owner when the DEP launched its investigation into the clearcutting at Sandpiper Bay resort in mid-May. The inspectors found that 17,789 square feet of healthy, mature mangroves were chopped down without a valid permit.

57. Additionally, the Defendants have both omitted numerous available facts, thereby creating false implications arising from otherwise truthful statements in regard to Mr. Mota and juxtaposed a series of facts so as to imply a defamatory connection between said facts.

58. The Defendants' false written suggestions, impressions and implications of fact were defamatory.

59. At the time the statements were made, the Defendants acted with the knowledge that their suggestions, impressions and implications were false, and/or they had reckless disregard as to the falsity of their suggestions, impressions and implications in regard to Mr. Mota, a private individual.

60. The false and defamatory statements prejudiced, harmed, and otherwise injured Mr. Mota's reputation, and resulted in the loss of money and business opportunities.

WHEREFORE, the Plaintiff, Michael Mota, demands judgment for compensatory damages against the Defendants, The Boston Globe and Amanda Milkovits, together with interest and costs, and for such further and other relief as this Honorable Court may deem just and proper.

Count IV - Defamation Per Se

61. The Plaintiff avers the allegations in Paragraphs 1 through 34, above, and incorporates them by reference as though they are fully rewritten herein.

62. The Defendants published numerous false written statements of fact about Mr. Mota, as listed in Paragraph 15, which were seen across the country.

63. The written statements of fact published by the Defendants were false.

64. The Defendants' false written statements of fact were defamatory, and subjected Mr. Mota to hatred, distrust, ridicule, contempt, and disgrace.

65. The defamatory statements, when considered alone and without innuendo, tend to injure people in Mr. Mota's trade and profession.

66. The false and defamatory statements prejudiced, harmed, and otherwise injured Mr. Mota's reputation, and resulted in the loss of money and business opportunities.

WHEREFORE, the Plaintiff, Michael Mota, demands judgment for compensatory damages against the Defendants, The Boston Globe and Amanda Milkovits, together with interest and costs, and for such further and other relief as this Honorable Court may deem just and proper.

Count V - Intentional Interference With a Contract

67. The Plaintiff avers the allegations in Paragraphs 1 through 34, above, and incorporates them by reference as though they are fully rewritten herein.

68. At all times material to this action, Mr. Mota had a contract between himself and Kieth Lee in regard to the Sandpiper Bay Resort, which would have netted Mr. Mota a share in the Sandpiper Bay Resort.

69. The Defendants knew about the contractual relationship involving Mr. Mota, and intentionally procured the termination of the contract by publishing defamatory claims against him.

70. There was no justification for the Defendants to publish these defamatory statements against Mr. Mota.

71. The Defendants' interference with Mr. Mota's contract caused him to lose his position with the Sandpiper Bay Resort and by extension, his share in the property.

WHEREFORE, the Plaintiff, Michael Mota, demands judgment for compensatory damages against the Defendants, The Boston Globe and Amanda Milkovits, together with interest and costs, and for such further and other relief as this Honorable Court may deem just and proper.

Count VI - Tortious Interference With Business Relations

72. The Plaintiff avers the allegations in Paragraphs 1 through 34, above, and incorporates them by reference as though they are fully rewritten herein.

73. At all times material to this action, Mr. Mota had business relations between himself and Kieth Lee in regard to the Sandpiper Bay Resort, which would have netted Mr. Mota a share in the Sandpiper Bay Resort.

74. The Defendants knew about the business relationship involving Mr. Mota, and intentionally interfered with the relationship by publishing defamatory claims against him.

75. There was no justification for the Defendants to publish these defamatory statements against Mr. Mota.

76. The Defendants interference with Mr. Mota's business relations caused him to lose his position with the Sandpiper Bay Resort, which would have netted Mr. Mota a share in the Sandpiper Bay Resort.

77. After the Defendants reported the lies stated above, Mr. Mota found his families company, Skyline at Waterplace, being evicted because the City no longer wanted to work with Mr. Mota. Moreover, after months of work, totaling \$600,000, and beds were being moved into the facility, Amos House decided to not move into the homeless shelter work. This cased a loss to Mr. Mota. Also, after Mr. Mota's partners were told that the state would not work with Mr. Mota, and the false story hit the cover of the Boston Globe, Mr. Mota lost out on the eventual sale of Memorial Hospital.

WHEREFORE, the Plaintiff, Michael Mota, demands judgment for compensatory damages against the Defendants, The Boston Globe and Amanda Milkovits, together with interest and costs, and for such further and other relief as this Honorable Court may deem just and proper.

Demand for Trial By Jury

The Plaintiff, Michael Mota, hereby demands a trial by jury on all issues so triable.

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DESIGNATION OF EMAIL ADDRESSES FOR SERVICE

(Pursuant to Rule 2.516 Fla. R. Jud. Admin.)

The undersigned attorneys of The Tickin Law Group hereby designate the following Email Addresses for service in the above styled matter. Service shall be complete upon emailing to the following email addresses in this Designation, provided that the provisions of Rule 2.516 are followed.

Serv549@LegalBrains.com; Serv536@LegalBrains.com;
Serv512@LegalBrains.com

SERVICE IS TO BE MADE TO EACH AND EVERY EMAIL ADDRESS LISTED IN THIS DESIGNATION AND TO NO OTHERS.