

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

JUAN JOSE RENDON,

Plaintiff,

v.

CARLOS MAURICIO FUNES,

Defendant.

GENERAL JURISDICTION DIVISION

CASE NO.:

COMPLAINT

Plaintiff, JUAN JOSE RENDON ("RENDON") sues Defendant, CARLOS MAURICIO FUNES ("FUNES"), and alleges the following:

Nature of this Action

1. This is an action brought by Plaintiff against the Defendant for defamation based on false statements of fact made during several press conferences and interviews given by Defendant on January 30, 2014, in which he stated, among other falsehoods, that Plaintiff was a rapist. Defendant made these false, highly defamatory and prejudicial statements with the intent to cause irreparable and permanent damage to the good name and reputation of Plaintiff.

2. Defendant began a campaign to destroy Plaintiff's personal and professional reputation by fabricating and disseminating these false accusations of criminal activity by Plaintiff. Defendant's defamatory statements made in the form of press conferences and interviews have been disseminated to diverse media outlets, including but not limited to, newspapers, radio, television, and the internet all of which are seen in Central America, South America, Caribbean, Europe, the United States and, particularly in South Florida.

3. Defendant successfully used his control and influence of the media to destroy

Plaintiff's reputation, cause him to be the subject of ridicule, hatred, contempt, and disgrace and to falsely accuse him of having committed a crime.

JURISDICTION AND VENUE

4. This is an action for damages in excess of \$100,000,000.00, exclusive of interests, costs and attorney's fees and is otherwise within the jurisdiction of this Court.

5. Plaintiff resides in Miami, Florida; Bogota, Colombia; and Mexico D.F., Mexico and derives business in different markets including Miami-Dade County, Florida.

6. Defendant is a resident of San Salvador, El Salvador and, based upon information and belief, he owns several properties, and bank accounts in the State of Florida, directly and indirectly using different nominees.

7. The Court has jurisdiction over the Defendant pursuant to Section 48.193(1)(b) of the Florida Statutes, because Defendant has committed his tortious acts, in Florida.

8. Venue is proper in this County as Defendant committed the tort of defamation in this County, by disseminating false statements and causing injury to Plaintiff throughout the United States, Europe, Central America, South America, and the Caribbean, including Miami-Dade County, and, therefore, Defendant is subject to personal jurisdiction by this Court.

9. All the necessary conditions precedent to the bringing of this action have been satisfied or waived by the Defendant.

FACTUAL BACKGROUND

10. At all times material hereto, Plaintiff is a political and media consultant to individuals and political groups throughout Latin America, the Caribbean, South America and South Florida. He assists in formulating political strategy, managing publicity, and analyzing public data such as polls and other statistical studies.

11. Plaintiff had established a successful career as an international political advisor, strategist, consultant and publicist by providing assistance in formulating

presidential, gubernatorial and mayoral, and other political campaigns in the Western Hemisphere.

12. Defendant is the current President of El Salvador.

13. As part of a smear campaign against the presidential candidates of the primary opposing political party, and individually and as the main spokesperson for the former terrorist organization, National Liberation Front Farabundo Marti ("FMLN"), Defendant gave a press conference on January 30, 2014;

14. In the press conference of January 30, 2014, Defendant, with malice and in total disregard to the truth, made several false statements, which include, but are not limited to the following:

- a. Plaintiff is an accused rapist;
- b. Plaintiff is a fugitive from justice, who has a red alert from Interpol, for having committed an act of sexual violence against the citizen Maria Eugenia Mora;
- c. Plaintiff is a rapist;
- b. Plaintiff is an international fugitive that orchestrates dirty war campaigns in all of Latin America;

All of these statements are false and defamatory in nature.

15. These statements were made with actual malice or reckless disregard for the truth, with the sole purpose of drawing negative media attention and discredit the presidential candidate for the National Republican Alliance Party ("ARENA") with total disregard to the damage that would cause Plaintiff.

16. Defendant's malicious and reckless falsehoods have caused Plaintiff permanent and irreparable harm to his reputation in South Florida and all over Latin America, affecting his present and future contracts for his services as political advisor and marketing strategist, and causing substantial economic harm in excess of \$100,000,000.00. Additionally, as a direct and proximate cause of Defendant's defamatory statements disseminated to the international media, Plaintiff has suffered shame, humiliation, mental

anguish and distress.

COUNT I - DEFAMATION

17. Plaintiff repeats and realleges the allegations of paragraphs 1 through 16 as if fully set forth herein.

18. By the statements detailed above in paragraphs 1 through 16, Defendant has knowingly and intentionally committed multiple acts of defamation against Plaintiff.

19. Defendant's defamatory statements are false statements of fact, published to third parties, and made with Defendant's knowledge that their falsity or with reckless disregard for the truth.

20. Defendant acted with malice, without justification or privilege, and with specific intent to injure Plaintiff by falsely portraying him as having committed criminal acts, thereby permanently tainting the public's perception of Plaintiff and his activities as an individual and as a political consultant.

21. As a direct and proximate result of Defendant's willful and malicious conduct, Plaintiff has been greatly injured in his reputation. He has been subjected to ridicule, hatred, contempt, and has sustained economic loss, loss of employment, and loss of potential employment.

22. Plaintiff reserves the right to add additional Counts of defamation upon completion of discovery.

WHEREFORE, Plaintiff, JUAN JOSE RENDON, demands judgment for compensatory damages in excess of \$100,000,000.00, punitive damages and costs against Defendant CARLOS MAURICIO FUNES, and granting him any other relief this Court may deem just and proper.


DEMAND FOR JURY TRIAL

Plaintiff, JUAN JOSE RENDON, demands a trial by jury as to all issues so triable.

Dated: January 31, 2014.

Respectfully submitted,

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By: 
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