

Filing # 45367313 E-Filed 08/17/2016 08:55:16 PM

**IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT,  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA**

BENJAMIN CARTER,	)	Case #:
Plaintiff,	)	
	)	COMPLAINT AND
	)	APPLICATION FOR
vs.	)	INJUNCTIVE RELIEF
	)	
JAMIE QUINN,	)	DEFAMATION
Defendant	)	

**COMPLAINT**

For his claims for relief against Defendant, Plaintiff alleges as follows:

**PARTIES, JURISDICTION AND VENUE**

1. Plaintiff, Benjamin Carter, resides at 64 Beacon Street, Worcester, MA 01610, with email address mrc37133@gmail.com.
2. Defendant, Jamie Quinn, resides at 465 Brickell Ave, Miami, FL 33131, with email address skydreamer938@gmail.com.
3. Defendant's actions, upon which the allegations in this Complaint are based, were

performed in this judicial district.

4. Therefore, upon information and belief, jurisdiction and venue are proper in this Court.

**COUNT I  
DEFAMATION**

5. On July 10th, 2016, Defendant, using her Facebook account, published false and defamatory statements about the Plaintiff on the Internet at the following web address:

<http://www.postandcourier.com/article/20140107/PC16/140109546/1177/charleston-businessman-indicted-in-massachusetts-sex-assault-case>

stating in the comments section: "Omg Ben! He used to screen Nigger out the windows while we were driving. Not to mention he is a perverted old man that touches little boys in their sleep. He deserves to burn in HELL"

6. The false statements were made about and concerning Plaintiff.

7. The false statements are and would be highly offensive to a reasonable person.

8. The false statements were published without privilege on publicly accessible pages on the Internet and thus to the world at large.

9. The false statements impugn Plaintiff's honesty, integrity, and reputation.

10. Defendant's malicious intent is demonstrated in his posting of the offensive false statements on web sites accessible to the public.

11. Plaintiff has suffered harm as a result of these false statements, including, but not limited to, damages to reputation.

12. Plaintiff will continue to suffer harm unless the false statements are restrained and enjoined.

**WHEREFORE**, Plaintiff prays for judgment against Defendant as follows:

1. For a permanent injunction compelling Defendant to remove the false statements from the Internet;
2. For a permanent injunction compelling Defendant to suppress the false statements from the Internet in the event Defendant cannot remove the false statement; and
3. For such other and further relief as the Court deems just and proper.

Dated, so respectfully, this 17th day of August.

*Ben Carter*

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Benjamin Carter  
64 Beacon Street  
Worcester, MA 01610  
mrc37133@gmail.com  
*Pro Se Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17th day of August 2016, the aforementioned document, the Complaint, was sent via email to the Defendant.

*Ben Carter*

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Benjamin Carter  
64 Beacon Street  
Worcester, MA 01610  
mrc37133@gmail.com  
*Pro Se Plaintiff*