

LLICV215014019

RETURN: NOVEMBER 23, 2021

JON A. GOODWIN
Plaintiff

v.

RAYMOND J. MILOT, JUNIOR;
JOANNE M. IURATO;
ROBERT KAHLIL;
KAREN HARDY-MASSARO;
HANNAH M. MILOT;
NOAH R. MILOT; and
CAMERON MILOT
Defendants

SUPERIOR COURT

JUDICIAL DISTRICT
OF LITCHFIELD

OCTOBER 8, 2021

OFFICE OF THE CLERK
SUPERIOR COURT
2021 OCT 21 PM 3 19
JUDICIAL DISTRICT OF
LITCHFIELD
STATE OF CONNECTICUT

Plaintiff Jon A. Goodwin as and for causes of action against the above-named defendants
alleges as follows:

COUNT ONE

1. Plaintiff, Jon A. Goodwin, is and has, at all times relevant hereto, been a private citizen of the United States and a resident of the State of Connecticut residing in New Milford. The plaintiff has enjoyed an excellent reputation for being an honest, fair and law-abiding person.

2. Defendant, Joanne M. Iurato ("Joanne Iurato"), is an adult citizen of the United States who resides in Ridgefield, Connecticut and operates a place of business in Brookfield, Connecticut.

3. On October 10, 2019, in the State of Connecticut, defendant Joanne Iurato falsely stated orally to Raymond J. Milot and the Connecticut Department of Children and Families ("DCF") that the plaintiff abused minor child Noah Milot, including by placing him in a "basket hold."

4. Defendant Joanne Iurato knew her statement was false or acted with reckless disregard for its truth when she made it.

5. As a direct and proximate result of defendant Joanne Iurato's actions, the plaintiff was subjected to investigative proceedings by DCF, and has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory, special, and punitive damages for slander *per se*.

COUNT TWO

1 – 5 Paragraphs 1 through 5 of the First Count are incorporated into this Second Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT THREE

1 – 5. Paragraphs 1 through 5 of the First Count is incorporated into this Third Count as if fully set forth herein.

6. The actions of defendant Joanne Iurato were extreme and outrageous and she knew or should have known that emotional distress was a likely result of her conduct.

7. As a result of the foregoing acts and/or omissions, defendant Joanne Iurato caused the plaintiff to suffer severe mental and emotional distress and has therefore caused the plaintiff to suffer damages.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory, special, and punitive damages for intentional infliction of emotional distress.

COUNT FOUR

1 - 5. Paragraphs 1 through 5 of the First Count are incorporated into this Fourth Count as if fully set forth herein.

8. At the time she her said false accusation, defendant Joanne Iurato knew or in the exercise of reasonable care should have known the accusations were not true.

9. At the time she made her said false accusations, defendant Joanne Iurato knew or in the exercise of reasonable care should have known that her conduct was likely to cause the plaintiff, as it would cause any person of ordinary sensibilities, to suffer severe mental and emotional distress.

10. As a result of the foregoing acts and/or omissions, defendant Joanne Iurato caused the plaintiff to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Joanne Iurato for compensatory and special damages for negligent infliction of emotional distress.

COUNT FIVE

1. Paragraph 1 of the First Count is incorporated into this Fifth Count as if fully set forth herein.

11. Defendant Raymond J. Milot, Junior ("Raymond Milot"), is an adult citizen of the United States residing in New Milford, Connecticut.

12. The plaintiff is informed and believes and thereon and alleges that, from or about October 10, 2019, until a date uncertain, in the State of Connecticut, defendant Raymond Milot maliciously, orally repeated the false accusation of defendant Joanne Iurato that the plaintiff abused Noah Milot, including by placing him in a "basket hold," to persons whose identities are presently known and not known to the plaintiff, including the plaintiff's neighbors and other members of the community in which he lives.

13. Defendant Raymond Milot knew that the said accusation was false or acted with reckless disregard for its truth when he made it.

14. As a direct and proximate result of defendant Raymond Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT SIX

1; 11, 14. Paragraph 1 of the First Count and paragraphs 11, and 14 of the Fifth Count are incorporated into this Sixth Count as if fully set forth herein.

15. The plaintiff is informed and believes and thereon alleges that, despite knowing defendant Joanne Iurato's reporting of the plaintiff to DCF, described in paragraph 3, was based on the false allegation the plaintiff abused Noah Milot or, acting with reckless disregard for whether defendant Joanne Iurato's reporting of the plaintiff to DCF that the plaintiff abused Noah Milot was truthful that, from on or after October 10, 2019 until a date uncertain, in the State of Connecticut, defendant Raymond Milot maliciously, orally stated, to persons whose identities are presently known and not known to the plaintiff, including the plaintiff's neighbors and other members of the community in which he lives, that the plaintiff is subject to an investigation by DCF for abusing Noah Milot.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT SEVEN

1; 11 - 14; 15. Paragraph 1 of the First Count and paragraph 11 and 14 of the Fifth Count and paragraph 15 of the Sixth Count are incorporated into this Seventh Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages false light invasion of privacy.

COUNT EIGHT

1. Paragraph 1 of Count One is hereby incorporated into this Eighth Count as if fully set forth herein.

16. Defendant Hannah Milot ("Hannah Milot") is a minor citizen of the United States residing in New Milford, Connecticut.

17. The plaintiff is informed and believes and thereon alleges that, from or about October 10, 2019, until a date uncertain, in the State of Connecticut, defendant Hannah Milot maliciously, orally repeated the false accusation that the plaintiff abused Noah Milot to persons whose identities are presently known and not known to the plaintiff, including the plaintiff's neighbors and other members of the community in which he lives.

18. Defendant Hannah Milot knew the accusation that the plaintiff abused Noah Milot was false or acted with reckless disregard for its truth when she made it.

19. As a direct and proximate result of defendant Hannah Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT NINE

1; 16 - 19. Paragraph 1 of the First Count and paragraphs 16 through 19 of the Eighth Count are incorporated into this Ninth Count as if fully set forth herein.

20. The plaintiff is informed and believes and thereon alleges that, despite knowing defendant Joanne Iurato's reporting of the plaintiff to DCF, described in paragraph 3, was based on the false allegation the plaintiff abused Noah Milot or, acting with reckless disregard for

whether defendant Joanne Iurato's reporting of the plaintiff to DCF that plaintiff abused Noah Milot was truthful, from on or about October 10, 2019 until a date uncertain, in the State of Connecticut, defendant Hannah Milot maliciously, orally stated to persons whose identities are presently known and not known to the plaintiff that the plaintiff was subject to an investigation by DCF for abusing Noah Milot.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT TEN

1; 16 - 19; 20. Paragraph 1 of the First Count, paragraphs 16 through 19 of the Eighth Count and paragraph 20 of the Ninth Count are incorporated into this Tenth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT ELEVEN

1; 11; 16. Paragraph 1 of the First Count, paragraph 11 of the Fifth Count and paragraph 16 of the Eighth Count are hereby incorporated into this Eleventh Count as if fully set forth herein.

21. During the evening of October 31, 2019, Noah Milot informed the plaintiff, that defendant Raymond Milot intended to "get him."

22. On November 1, 2019, when Hannah Milot was staying at her mother, Christine Jowdy's ("Jowdy") and the plaintiff's residence, in New Milford, Connecticut, defendant Raymond Milot met with Hannah Milot in his vehicle outside Christine Jowdy's residence. Upon information and belief, during their meeting, defendant Raymond Milot encouraged

Hannah Milot to instigate a physical altercation with Noah Milot, to cause the plaintiff to restrain him so that Hannah Milot could use her phone to create a video of such restraints to be used to initiate a false report of child abuse to the DCF and law enforcement agencies.

23. Immediately upon her returning from meeting defendant Raymond Milot, Hannah Milot began agitating Noah Milot to the point he attacked her with a weapon he manufactured with bolts he taped between his fingers in a manner that they protruded from his fist approximately one inch, Christine Jowdy (Hannah and Noah Milot's mother), blocked Noah Milot from assailing Hannah Milot. Christine Jowdy then summoned the plaintiff to assist her. As soon as the plaintiff removed the bolts from Noah Milot's fists, using her phone, Hannah Milot began videoing the plaintiff, who was working to restrain Noah Milot to prevent him from continuing to attack Christine Jowdy and Hannah Milot. While the plaintiff restrained Noah Milot, Christine Jowdy summoned the New Milford Police. Speaking with the police outside of the plaintiff's presence, Hannah Milot attempted to convince them that the plaintiff had abused Noah Milot and showed them a photograph she had taken but failed to inform them she had also taken a video. The police were not persuaded by Hannah Milot's false accusations that the plaintiff "abused" Noah Milot and determined there was no evidence of any crime by the plaintiff or Christine Jowdy.

24. Despite the police clearing the plaintiff of any wrongdoing on the evening of November 1, 2019, on November 3, 2019, aided by defendant Raymond Milot, Hannah Milot took her phone to the New Milford, Connecticut public school she was attending and reported to a member of the school's staff known only to the plaintiff as "Mrs. Hamilton," that the plaintiff had "abused" Noah Milot and showed Mrs. Hamilton the video of the plaintiff restraining him.

Mrs. Hamilton contacted DCF and reported Hannah Milot's false allegations to them. The plaintiff is informed and believes thereon and alleges that DCF employees reviewed Hannah Milot's false accusations and the video she took of the incident.

25. Defendants Hannah Milot knew her statement that the plaintiff abused Noah Milot was false when she made it. Defendant Raymond Milot knew Hannah Milot's statement was false or acted with reckless disregard for its truth when he aided Hannah Milot to make it.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot and Hannah Milot for compensatory, special, and punitive damages for defamation *per se*.

COUNT TWELVE

1; 11; 16; 21 - 25. Paragraph 1 of the First Count, paragraph 11 of the Fifth Count, paragraph 16 of the Eighth Count and paragraphs 21 through 25 of the Eleventh Count are hereby incorporated into this Twelfth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot and Hannah Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT THIRTEEN

1; 16 - 19. Paragraph 1 of the First Count and paragraphs 16 through 19 of the Eleventh Count are incorporated into this Thirteenth Count as if fully set forth herein.

26. On November 11, 2019, in the State of Connecticut, defendant Hannah Milot, falsely and maliciously stated in writing to a person identified as "Victor-in-Secret" that the plaintiff "held [Noah Milot] back in a way that could've broken his neck."

27. Defendant Hannah Milot knew her said accusation was false or acted with reckless disregard for its truth when she made it.

28. As a direct and proximate result of defendant Hannah Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory and punitive damages for liber *per se*.

COUNT FOURTEEN

1. Paragraph 1 of Count One is hereby incorporated into this Fourteenth Count as if fully set forth herein.

29. Defendant, Robert Khalil ("Robert Khalil"), is an adult citizen of the United States who resides in Redding, Connecticut and operates a place of business in Ridgefield, Connecticut.

30. On November 26, 2019, in Ridgefield, Connecticut, defendant Robert Khalil falsely stated orally to Raymond J. Milot and DCF that the plaintiff abused minor child Noah Milot, including by hanging him off a deck by his ankles.

31. On May 24, 2021, in the State of Connecticut, during a telephone call with Raymond J. Milot and Christine Jowdy, who was in the State of Connecticut, defendant Robert Khalil orally repeated his false accusation that the plaintiff abused Noah Milot.

32. Defendant Robert Khalil knew his said statements were false or acted with reckless disregard for their truth when he made them.

33. As a direct and proximate result of defendant Robert Khalil's actions, the plaintiff was subjected to investigative proceedings by DCF, and has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Robert Khalil for compensatory, special, and punitive damages for slander *per se*.

COUNT FIFTEEN

1; 29 - 33. Paragraph 1 of the First Count and paragraphs 29 through 33 of the Fourteenth Count are incorporated into this Fifteenth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Robert Khalil for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT SIXTEEN

1; 29 - 33. Paragraph 1 of the First Count and paragraphs 29 through 33 of the Fourteenth Count are incorporated into this Sixteenth Count as if fully set forth herein.

34. The actions of defendant Robert Khalil were extreme and outrageous and he knew or should have known that emotional distress was a likely result of his conduct.

35. As a result of the foregoing acts and/or omissions, defendant Robert Khalil caused the plaintiff to suffer severe mental and emotional distress and has therefore caused the plaintiff to suffer damages.

WHEREFORE, the plaintiff claims judgement against defendant Robert Khalil for compensatory, special, and punitive damages for intentional infliction of emotional distress.

COUNT SEVENTEEN

1; 29 - 33. Paragraph 1 of the First Count and paragraphs 29 through 33 of the Fourteenth Count are incorporated into this Seventeenth Count as if fully set forth herein.

36. At the time he made his said false accusations, Robert Khalil knew or in the exercise of reasonable care should have known that his conduct was likely to cause the plaintiff, as it would cause any person of ordinary sensibilities, to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Robert Khalil for compensatory and special damages for negligent infliction of emotional distress.

COUNT EIGHTEEN

1; 11; 16. Paragraph 1 of Count One, paragraph 11 of Count Five and paragraph 16 of Count Eight are hereby incorporated into this Eighteenth Count as if fully set forth herein.

37. Defendant Cameron Milot ("Cameron Milot"), is a minor citizen of the United States residing in New Milford, Connecticut.

38. Defendant Noah Milot ("Noah Milot"), is a minor citizen of the United States residing in New Milford, Connecticut.

39. At all times relevant hereto, Ms. Jowdy has shared physical custody of defendants Noah Milot, Hannah Milot and Cameron Milot (the "Jowdy/Milot Children") with defendant Raymond Milot.

40. The plaintiff began living with Ms. Jowdy in late September 2019.

41. From September 30, 2019, in the State of Connecticut, defendant Raymond Milot stalked the plaintiff obtaining private information regarding the plaintiff supplied him by Cameron Milot, Hannah Milot and Noah Milot which information included photographs and videos of the plaintiff and the plaintiff's personal property, taken within the plaintiff's residence, without the plaintiff's consent or knowledge and information regarding the plaintiff's whereabouts, movements and plans.

42. Using such information defendants Raymond Milot, Hannah Milot, Noah Milot and Cameron Milot, in the State of Connecticut, knowingly, willfully, and with malicious intent, instigated, coordinated, participated in or monitored threatening, assaultive and violent incidents at the plaintiff's and Ms. Jowdy's residence with a malicious intent to unjustly vex, annoy, trouble, harass, battery and assault the plaintiff to video the plaintiff's responses for use to instigate complaints of child abuse against the plaintiff to DCF which incidents included:

- a. During the evening of October 8, 2019, defendant Noah Milot, intending to cause harmful contact with the plaintiff's person, without the plaintiff's consent, kicked him numerous times;
- b. During the evening of October 31, 2019, defendant Noah Milot informed the plaintiff, that defendant Raymond Milot intended to "get him";

- c. During the evening of November 1, 2019, while grappling with his mother, and attempting to attack his sister with an improvised weapon, defendant Noah Milot, intending to cause harmful contact with the plaintiff's person without the plaintiff's consent, kicked the plaintiff numerous times;
- d. During the morning of November 3, 2019, defendant Raymond Milot, in the presence of Hannah Milot and Noah Milot falsely stated to officer Dylan McIntyre of the New Milford Police Department that the plaintiff is a "psycho," "abusive" and "under investigation by DCF";
- e. During the evening of November 3, 2019, Noah Milot and defendant Hannah Milot informed the plaintiff that defendant Raymond Milot was obtaining a restraining order against him;
- f. On March 12, 2020, Noah Milot informed the plaintiff that Raymond Milot was going to "use poison on him and [Ms. Jowdy]";
- g. On March 21, 2020, during an altercation with her mother, Hannah Milot, intending to provoke the plaintiff into restraining her, shoved the plaintiff and poked at his chest, without the plaintiff's consent; and
- h. On March 22, 2020, in defiance of Ms. Jowdy's directive for her to remain outside Ms. Jowdy's and the plaintiff's residence until she returned, Hannah Milot entered the residence and harassed the plaintiff, screaming at him that he is a "bitch" and an "imposter" while he was eating dinner which, upon information and belief, was an attempt to cause the plaintiff to physically remove her from his residence which the plaintiff did not.

43. Defendants Raymond Milot, Hannah Milot, Noah Milot and Cameron Milot, without the plaintiff's knowledge or consent, published, caused, or agreed to publish the said private information above regarding the plaintiff to DCF and other third parties, including neighbors and members of the community in which the plaintiff resides, noting to them DCF investigating the plaintiff for abusing Noah Milot, thereby violating the plaintiff's right to privacy.

44. Defendant Raymond Milot knew his statement that the plaintiff abused Noah Milot and is a psycho was false or acted with reckless disregard for its truth when he made it.

45. Defendants Raymond Milot, Noah Milot, Hannah Milot and Cameron Milot intentional intrusions, upon the plaintiff's private affairs and concerns, would be highly offensive to a reasonable person.

46. As a direct and proximate result of defendant Raymond Milot, Noah Milot, Hannah Milot and Cameron Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT NINETEEN

1; 11; 16; 37 - 46. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight and paragraphs 37 through 46 of Count Eighteen are hereby incorporated into this Nineteenth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, Noah Milot, Hannah Milot and Cameron Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT TWENTY

1; 11; 16; 37 - 46. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight and paragraphs 37 through 46 of Count Eighteen are hereby incorporated into this Twentieth Count as if fully set forth herein.

47. Defendants Raymond Milot, Noah Milot, Hannah Milot and Cameron Milot obtained, published caused, or agreed to publish the said private information to place the plaintiff in false light with third parties causing them to file false reports regarding the plaintiff with DCF and causing DCF personnel to investigate the plaintiff.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, Noah Milot, Hannah Milot and Cameron Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT TWENTY-ONE

1; 11; 16; 37 - 46. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight and paragraphs 37 through 46 of Count Eighteen are hereby incorporated into this Twenty-First Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, Noah Milot, Hannah Milot and Cameron Milot for compensatory, special, and punitive damages for battery.

COUNT TWENTY-TWO

1; 11; 16; 37 - 46. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight and paragraphs 37 through 46 of Count Eighteen are hereby incorporated into this __ Count as if fully set forth herein.

48. Through their coordinated or independent actions defendants Raymond Milot, Noah Milot, Hannah Milot and Cameron Milot intended to cause and did cause plaintiff to suffer apprehension of immediate harmful contacts.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, Noah Milot, Hannah Milot and Cameron Milot for compensatory, special, and punitive damages for assault.

COUNT TWENTY-THREE

1; 16. Paragraph 1 of Count One and paragraph 16 of Count Eight are hereby incorporated into this Twenty-Third Count as if fully set forth herein.

49. On March 21, 2019, defendant Hannah Milot, in the State of Connecticut, falsely and maliciously stated in writing to persons known and unknown to the plaintiff that:

- a. the plaintiff is “abusive ... and trying to take [her] phone”;
- b. she couldn’t go back to her [mother’s] house [because the plaintiff is] abusive”; and
- c. the plaintiff “bullies [her] all the time”;

50. Defendant Hannah Milot knew her said accusations were false when she made them.

51. As a direct and proximate result of defendant Hannah Milot's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for libel *per se*.

COUNT TWENTY-FOUR

1; 16. Paragraph 1 of Count One and paragraph 16 of Count Eight are hereby incorporated into this Twenty-Fourth Count as if fully set forth herein.

52. On March 21, 2019, defendant Hannah Milot, in the State of Connecticut, falsely and maliciously orally stated to John Sands and Leslie Sands that the plaintiff "threatened" her.

53. Defendant Hannah Milot knew her said accusations were false when she made them.

WHEREFORE, the plaintiff claims judgement against defendant Hannah Milot for compensatory, special, and punitive damages for slander *per se*.

COUNT TWENTY-FIVE

1; 11. Paragraphs 1 of Count One and paragraph 11 of Count Five are hereby incorporated into this Twenty-Fifth Count as if fully set forth herein.

54. On or about August 24, 2020, Raymond Milot published a Connecticut Juvenile Court document referring to the plaintiff as a “party” to the action to persons not permitted by law to receive the document.

55. The plaintiff has never been a party to any juvenile court action in Connecticut or anywhere.

56. Defendant Raymond Milot’s disclosure of the document violated C.G.S. § 46(b) – 124 (b), (c).

57. At the time defendant Raymond Milot published the juvenile court document containing the false statement that the plaintiff is a party to the action, defendant Raymond Milot knew or in the exercise of reasonable care should have known the said statement in the document regarding the plaintiff was false or acted with reckless disregard for its truth when he made it.

58. As a direct and proximate result of defendant Raymond Milot’s actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for defamation *per se*.

COUNT TWENTY-SIX

1; 11; 54 - 58. Paragraphs 1 of Count One, paragraph 11 of Count Five and paragraphs 54 through 58 of the Twenty-Fifth Count are hereby incorporated into this Twenty-Sixth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT TWENTY-SEVEN

1. Paragraph 1 of Count One is hereby incorporated into this Twenty-Seventh Count as if fully set forth herein.

59. Defendant, Karen Hardy-Massaró ("Karen Hardy-Massaró"), is an adult citizen of the United States who resides in Cheshire, Connecticut.

60. On June 11, 2021, in the State of Connecticut, during a public, virtual school meeting regarding Noah Milot, attended by approximately thirteen (13) persons, defendant Karen Hardy-Massaró orally informed meeting attendees that, pursuant to an order of the Juvenile Court, the plaintiff is not allowed around the Milot children.

61. Karen Hardy-Massaró's public disclosure of information pertaining to juvenile court orders violated C.G.S. § 46(b) - 124 (b), (c).

62. Defendant Karen Hardy-Massaró knew her statement was false or acted with reckless disregard for its truth when she made it.

63. As a direct and proximate result of defendant Karen Hardy-Massaró's actions, the plaintiff has suffered and continues to suffer damages including, but not limited to, harming his reputation, causing him not to be able to raise capital for his current venture and impairing his

ability to raise capital in the future from members of his community, causing him to take significant time away from work and he may incur lost time away from work in the future, being subjected to threats and threatening conduct, embarrassment, humiliation, anxiety, scorn, derision, ridicule, and emotional distress.

64. Upon hearing defendant Karen Hardy-Massaro's false accusation, during the meeting, the plaintiff informed Karen Hardy-Massaro that her statement was defamatory. Despite that, Karen Hardy-Massaro refused to retract her statement.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory, special, and punitive damages for slander *per se*.

COUNT TWENTY-EIGHT

1; 59 - 64. Paragraph 1 of Count One and paragraphs 59 through 64 of the Twenty-Seventh Count are hereby incorporated into this Twenty-Eighth Count as if fully set forth herein.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory, special, and punitive damages for false light invasion of privacy.

COUNT TWENTY-NINE

1; 59 - 64. Paragraph 1 of Count One and paragraphs 59 through 64 of the Twenty-Seventh Count are hereby incorporated into this Twenty-Ninth Count as if fully set forth herein.

65. The actions of defendant Karen Hardy-Massaro were extreme and outrageous and she knew or should have known that emotional distress was a likely result of her conduct.

66. As a result of the foregoing acts and/or omissions, defendant Karen Hardy-Massaro caused the plaintiff to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory, special, and punitive damages for intentional infliction of emotional distress

COUNT THIRTY

1; 59 - 64. Paragraph 1 of Count One and paragraphs 59 through 64 of the Twenty-Seventh Count are hereby incorporated into this Thirtieth Count as if fully set forth herein.

67. At the time she her said false accusation, defendant Karen Hardy-Massaro knew or in the exercise of reasonable care should have known the accusations were not true.

68. At the time she made her said false accusations, defendant Karen Hardy-Massaro knew or in the exercise of reasonable care should have known that her conduct was likely to cause the plaintiff, as it would cause any person of ordinary sensibilities, to suffer severe mental and emotional distress.

69. As a result of the foregoing acts and/or omissions, defendant Karen Hardy-Massaro caused the plaintiff to suffer severe mental and emotional distress.

WHEREFORE, the plaintiff claims judgement against defendant Karen Hardy-Massaro for compensatory and special damages for negligent infliction of emotional distress.

COUNT THIRTY-ONE

1; 11 - 14; 15; 16 - 19; 20; 21- 25; 26 - 28; 37 - 46; 47; 48; 49 - 51; 52 - 53; 54 - 58.

Paragraph 1 of Count One, paragraphs 11 through 14 of Count Five, paragraph 15 of Count Six, Count Seven, paragraphs 16 through 19 of Count Eight, paragraph 20 of Count Nine, Count 10, paragraphs 21- 25 of Count Eleven, Count Twelve, paragraphs 26 - 28 of Count Thirteen, paragraphs 37 - 46 of Count Eighteen, Count Nineteen, paragraph 47 of Count Twenty, Count Twenty-One, paragraph 48 of Count Twenty-Two, paragraphs 49 - 51 of Count Twenty-Three,

paragraphs 52 - 53 of Count Twenty-Four, paragraphs 54 through 58 of Count Twenty-Five and Count 26 are hereby incorporated into this Thirty-First Count as if fully set forth herein.

70. As a result of defendant Raymond Milot's aforesaid malicious actions targeting the plaintiff, opportunities for the plaintiff to raise capital for his venture and engage in business opportunities with members of his community are forever severely impeded.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot and Hannah Milot for compensatory, special, and punitive damages for tortious interference with business relationships and expectations.

COUNT THIRTY-TWO

1; 11; 16; 37. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraph 16 of Count Eight, and paragraph 37 of Count Eighteen are hereby incorporated into this Thirty-Second Count as if fully set forth herein.

71. Despite knowing, on or about November 4, 2019, of a pending or impending civil action involving the plaintiff, defendants Raymond Milot, Hannah Milot and Cameron Milot, destroyed, agreed to destroy or caused the destruction of evidence, in bad faith, with the intent to deprive the plaintiff of causes of action against her and others with whom she has confederated to damage the plaintiff.

72. Without the plaintiff's inability to establish *prima facie* cases of libel *per se* and related claims of false light invasion of privacy, invasion of privacy, tortious interference with business relationships and expectations and intentional infliction of emotional distress without the spoliated evidence.

WHEREFORE, the plaintiff claims judgement for compensatory, special, and punitive damages against defendants Raymond Milot, Hannah Milot and Cameron Milot for the intentional spoliation of evidence.

COUNT THIRTY-THREE

1; 11; 16 - 19; 20; 21- 25; 26 - 28; 37 - 46; 47; 48; 49 - 51; 52 - 53; 54 - 58; 70; 71 - 72.

Paragraph 1 of Count One, paragraph 11 of Count Five, paragraphs 16 through 19 of Count Eight, paragraph 20 of Count Nine, Count 10, paragraphs 21- 25 of Count Eleven, Count Twelve, paragraphs 26 - 28 of Count Thirteen, paragraphs 37 - 46 of Count Eighteen, Count Nineteen, paragraph 47 of Count Twenty, Count Twenty-One, paragraph 48 of Count Twenty-Two, paragraphs 49 - 51 of Count Twenty-Three, paragraphs 52 - 53 of Count Twenty-Four, paragraphs 54 through 58 of Count Twenty-Five, Count Twenty-Six, paragraph 70 of Count Thirty-One, and paragraphs 71 through 72 of Count Thirty-Two are hereby incorporated into this Thirty-Third Count as if fully set forth herein.

73. The conduct of defendants Raymond Milot, Hannah Milot, Noah Milot and Cameron Milot described above was extreme and outrageous and was carried out for the purpose of inflicting emotional distress and injury upon the plaintiff.

74. Defendants Raymond Milot, Hannah Milot, Noah Milot and Cameron Milot, by their said actions intended to cause the plaintiff emotional distress or were reckless in their failure to realize that emotional distress was a likely result of this conduct.

75. As a result of the foregoing acts and/or omissions, defendants Raymond Milot, Hannah Milot, Noah Milot and Cameron Milot caused the plaintiff to suffer severe mental and emotional distress and have therefore caused the plaintiff to suffer damages.

WHEREFORE, the plaintiff claims judgement against defendants Raymond Milot, Hannah Milot, Noah Milot and Cameron Milot for compensatory, special, and punitive damages for intentional infliction of emotional distress.

COUNT THIRTY-FOUR

1; 11; 16 - 19; 20; 21- 25; 26 - 28; 37 - 46; 47; 48; 49 - 51; 52 - 53; 54 - 58; 70; 71 - 72; 73 - 75. Paragraph 1 of Count One, paragraph 11 of Count Five, paragraphs 16 through 19 of Count Eight, paragraph 20 of Count Nine, Count 10, paragraphs 21- 25 of Count Eleven, Count Twelve, paragraphs 26 - 28 of Count Thirteen, paragraphs 37 - 46 of Count Eighteen, Count Nineteen, paragraph 47 of Count Twenty, Count Twenty-One, paragraph 48 of Count Twenty-Two, paragraphs 49 - 51 of Count Twenty-Three, paragraphs 52 - 53 of Count Twenty-Four, paragraphs 54 through 58 of Count Twenty-Five, Count Twenty-Six, paragraph 70 of Count Thirty-One, paragraphs 71 through 72 of Count Thirty-Two and paragraphs 73 through 75 of Count Thirty-Three are hereby incorporated into this Thirty-Fourth Count as if fully set forth herein.

76. At all times relevant herein, Defendant Raymond Milot: (a) knew or had reason to know of the necessity for him to control Hannah Milot, Noah Milot and Cameron Milot; (b) had the ability or opportunity to control Hannah Milot, Noah Milot and Cameron Milot; and (c) did not exercise reasonable care to prevent injuries to the plaintiff by Hannah Milot, Noah Milot and Cameron Milot.

77. At all times relevant herein, the defendant Raymond Milot was the natural guardian and natural parent of Hannah Milot, Noah Milot and Cameron Milot, who were members of Raymond Milot's household and/or over who defendant Raymond Milot could

exercise control at the time of their intentional, wanton and malicious actions toward the plaintiff which resulted in the plaintiff's injuries and damages described above.

78. The plaintiff's injuries and damages were caused by defendant Raymond Milot's misuse of defendants Hannah Milot, Noah Milot and Cameron Milot as confederates and proxies to willful and maliciously commit unlawful and tortious acts.

WHEREFORE, the plaintiff claims judgement against defendant Raymond Milot for compensatory, special, and punitive damages for vicarious liability for the torts of minors.

79. The plaintiff's injuries and damages were caused by the negligence of defendant Raymond Milot, in that he failed to restrain Hannah Milot, Noah Milot and Cameron Milot, failed to exercise reasonable care in controlling them, and failed to properly supervise them despite his knowledge of their injurious propensities, or should have known of their injurious propensities.

THE PLAINTIFF



BY

JON A. GOODWIN, PRO SE
95 Indian Trail (CLC)
New Milford, CT 06776
+1 (212) 372-4803 telephone
+1 (212) 372-0982 facsimile
jgoodwin@protonmail.com

THE PLAINTIFF

RETURN: NOVEMBER 23, 2021

JON A. GOODWIN
Plaintiff

v.

RAYMOND J. MILOT, JUNIOR;
JOANNE M. IURATO;
ROBERT KAHLIL;
KAREN HARDY-MASSARO;
HANNAH M. MILOT;
NOAH R. MILOT; and
CAMERON MILOT
Defendants

SUPERIOR COURT
JUDICIAL DISTRICT
OF LITCHFIELD

OCTOBER 8, 2021

PRAYER FOR RELIEF

The plaintiff claims judgement in an amount greater than fifteen thousand dollars (\$15,000.00), exclusive of interest and costs, for compensatory damages, special damages, and punitive damages.

THE PLAINTIFF



BY

JON A. GOODWIN, PRO SE
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