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

CIVIL DIVISION

CASE NO.: 09-68539 CA 25

JOHN GIORDONO, individually
and G&G ADDICTION TREATMENT, INC.,
a Florida Corporation
Plaintiff,

v.

DONNA L. ROMEO and XCENTRIC VENTURES, LLC
an Arizona Limited Liability Corporation/
Defendant.

SUMMONS

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the Complaint in this
action on Defendant:

**XCENTRIC VENTURES, LLC
c/o MARIA CRIMI SPETH ESQ.
3200 N. CENTRAL AVE STE 2000
PHOENIX, AZ. 85012**

Defendant is required to serve written defenses to the Complaint or Petition on Plaintiff's attorney,
to-wit:

**ROSEN SWITKES & ENTIN P.L.
Attention: Joshua Entin
407 Lincoln Road PH SE
Miami Beach, FL 33139
(P) (305) 534-4757
(F) (305) 538-5504**

✓ JSE
10-26-09

**Joshua Entin, Esquire
FBN.: 0493724**

within twenty (20) days after service of this Summons on that Defendant, exclusive of the day of service,
and to file the original of the defenses with the Clerk of this Court either before service on Plaintiff's
attorney or immediately thereafter. If a Defendant fails to do so, a default will be entered against the
Defendant for the relief demanded in the Complaint or Petition.

SEP 17 2009

WITNESS my hand and the seal of said Court on _____

By _____
As Deputy Clerk

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

CIVIL DIVISION

CASE NO: 09-68539 CA 25

JOHN GIORDANO, individually,
and G & G ADDICTION
TREATMENT, INC., a Florida
Corporation,

Plaintiff,

vs.

DONNA L. ROMEO, and
XCENTRIC VENTURES, LLC,
an Arizona Limited Liability
Corporation

Defendants.

THE ORIGINAL FILED

ON SEP 17 2009

**IN THE OFFICE OF
CIRCUIT COURT DADE CO.
CIVIL DIVISION**

COMPLAINT

Plaintiffs, JOHN GIORDANO ("Giordano") and G & G HOLISTIC ADDICTION
TREATMENT, INC. ("G & G"), by and through undersigned counsel, hereby sues Defendants,
DONNA L. ROMEO ("Romeo"), and XCENTRIC VENTURES, LLC ("Xcentric"), and alleges:

PARTIES AND JURISDICTION

1. This is an Action for damages in excess of \$15,000.00 exclusive of interest, fees, and costs.
2. Plaintiff G & G Holistic Addiction Treatment, Inc. is a Florida corporation authorized to do business in the State of Florida and which conducts business in Miami-Dade County, Florida.
3. Plaintiff John Giordano is a resident of Miami-Dade County, Florida, and is the President of Plaintiff G & G

4. Defendant Romeo is an individual who is now, and was at all times material hereto, a resident of Pinellas County, Florida.

5. Defendant XCentric is an Arizona Limited Liability Corporation that runs a website, www.ripoffreport.com, which is intentionally available to be viewed, and is viewed, by persons residing in Miami-Dade County, Florida.

6. Venue is proper in Miami-Dade County because the injuries resulting from Defendants' publication of defamatory information occurred in this County.

7. The Court has personal jurisdiction over Defendant Xcentric because (a) it engages in substantial and not isolated activities in the State of Florida and benefit substantially from these activities; (b) it committed violations of Florida law in Florida; and (c) Xcentric's published defamatory and unlawful information concerning Plaintiffs who are Florida residents, and the effects of Xcentric's defamatory publication were directed to and substantially felt in Florida.

GENERAL ALLEGATIONS

8. Defendant had business dealings in Miami-Dade County Florida, including business dealing with the Plaintiffs.

9. Plaintiff G & G was and is a business of good name, credit and reputation, it enjoyed the esteem and good opinion of others in the community, and is accredited by the Joint Commission on Accreditation of Healthcare Organizations.

10. As the Director of G & G and the chaplain for a local police department Giordano was and is an individual of good name, credit and reputation and enjoyed the esteem and good opinion of others in the community.

11. On or about July 8, 2009, Defendant Romeo published information on the "Ripoff Report," a website that, by its own terms, is "a worldwide consumer reporting Web site and

publication, by consumers, for consumers, to file and document complaints about companies or individuals. While we encourage and even require authors to only file truthful reports, *Ripoff Report does not guarantee that all reports are authentic [sic] or accurate.*”

12. Other areas of the ripoffreport.com provide that, per their policy, the website will absolutely not remove false, defamatory information posted thereon, even when asked to do so by the maker of the defamatory statements.

13. In her internet post, published for all the world to see, Romeo stated such things as:

- a. G & G’s facility is “dangerous to one’s health and well being”;
- b. “The majority of the personnel are recovering addicts and have no business counseling their clients”;
- c. The living accommodations are “outdated and unsanitary”
- d. “employees also illegal disburse medications”;
- e. “The owners and employees are not adequately educated to deal with the problems they advertise they expertise in”
- f. “There is plenty of negative talk about the consequences of your addition/behaviors, like death or insanity, but coping skills after your departure from this 'safe haven' are not taught. This is why they have as high suicide rate of their former clients. (while I was there, in June 2009, a young man killed himself after only two weeks of leaving G & G.. They estimate that there is at least 8 client suicides a year that are reported)”
- g. “The living accomodations, an outdated motel in a questional part of North Miami are outdated and unsanitary. There is a sewage problem which results in an odor permiating the facility, a problem with sand fleas (bed bugs), inadequate electrical supply, and fire hazards”

- h. "The food is not organic nor is it prepared by chefs, as is advertised"
 - i. "Detox, Highpoint, is a joke. You are not detoxed there, just changed to a medication similar to what you were on"
 - j. "Oh yes, one of the owners is a convicted felon. Read all about it - http://neuro.law.cornell.edu/nyctap/search/display.html?terms=fines&url+nyctap/195_0309.htm. He is underhanded, uncompassionate and after your money. This is really worth your search, it was a 'family' business, if you know what I mean"
14. A copy of the published defamatory comments is attached hereto as Exhibit "A."
15. The above-quoted statements (the "statements") made by Romeo and posted on RipoffReport.com are false.
16. People contacting Plaintiff G & G have quoted the false statements as the reason for not contracting with G & G for services to be rendered. The names of these individuals cannot be listed for privacy reasons and/or are unknown because they were not provided to the Plaintiffs.
17. The article cited by Romeo purporting to show that Plaintiff Giordano is a convicted felon further implies that the Giordano is a member of the mafia.
18. In fact the name of the person in the article happens to be the same as Plaintiff Giordano who is *not* a convicted felon. Indeed, if Giordano is a felon as Romeo falsely alleges, he would have been precluded from holding his post as chaplain for a local police department.

COUNT I – Libel
(By G &G against Romeo)

19. G & G repeats, re-alleges and incorporates by reference paragraphs 1-18 as if fully set forth herein.
20. Romeo made false and defamatory statements against G & G.
21. These false statements were published to third parties, indeed, to the entire world, via

publication on the World Wide Web.

22. At a minimum, the publication of the statements were negligently posted by the Defendant or posted without reasonable care as to the truth or falsity of the statements.

23. As a result of the publication, the G & G has been injured in its good name, credit and reputation.

24. The damage to G & G's reputation was proximately caused by Romeo's publication of the statements.

25. The false statements were published by Romeo with malice, hatred and ill will toward G & G and with the desire to injure it.

WHEREFORE Plaintiff G & G demands judgment for damages against Defendant Romeo for general damages, special damages, as well as awarding attorney's fees, costs, and expenses incurred in prosecuting this action pursuant to Fla. Stat. § 57.105, and granting such further relief as this Court deems just and equitable. Further, because of Defendant Romeo's malice in publishing the defamatory statements, G & G reserves the right seeks punitive damages upon subsequent Motion filed with the Court pursuant to Fla. Stat. § 768.72.

COUNT II – Libel Per Se
(By G &G against Romeo)

26. G & G repeats, re-alleges and incorporates by reference paragraphs 1-18 as if fully set forth herein.

27. Romeo made false statements against G & G, including falsely accusing G & G of engaging in illegal activity directly relating to its trade and business.

28. These false statements were published to third parties, indeed, to the entire world, via publication on the World Wide Web.

29. When considered alone and without innuendo, these statements tended to injure G &G in

its trade and business and attributes to G & G conduct, characteristics, and conditions incompatible with the proper exercise of a lawful business.

30. Defendant Romeo made these statements with a reckless disregard for the truth and without reasonable grounds for her to believe they were true.

31. As a result of the publication, the G & G has been injured in its good name, credit and reputation.

32. The damage to G & G's reputation was proximately caused by Romeo's publication of the statements.

WHEREFORE Plaintiff demands judgment for damages against Defendant Romeo for general damages, special damages, as well as awarding attorney's fees, costs, and expenses incurred in prosecuting this action pursuant to Fla. Stat. § 57.105, and granting such further relief as this Court deems just and equitable. Further, because of Defendant Romeo's malice in publishing the defamatory statements, G & G reserves the right seeks punitive damages upon subsequent Motion filed with the Court pursuant to Fla. Stat. § 768.72.

COUNT III – Libel
(By Giordano against Romeo)

33. Giordano repeats, re-alleges and incorporates by reference paragraphs 1-18 as if fully set forth herein.

34. Romeo made false and defamatory statements against Giordano.

35. These false statements were published to third parties, indeed, to the entire world, via publication on the World Wide Web.

36. The statements made by Romeo are known or should have been known by her to be false.

37. At a minimum, the publication of the statements were negligently posted by the Defendant or posted without reasonable care as to the truth or falsity of the statements.

38. As a result of the publication, Giordano has been injured in his good name, credit and reputation.

39. The damage to Giordano's reputation was proximately caused by Romeo's publication of the statements.

40. The false statements were published by Romeo with malice, hatred and ill will toward Giordano and with the desire to injure him.

WHEREFORE Plaintiff Giordano demands judgment for damages against Defendant Romeo for general damages, special damages, as well as awarding attorney's fees, costs, and expenses incurred in prosecuting this action pursuant to Fla. Stat. § 57.105, and granting such further relief as this Court deems just and equitable. Further, because of Defendant Romeo's malice in publishing the defamatory statements, Giordano reserves the right seeks punitive damages upon subsequent Motion filed with the Court pursuant to Fla. Stat. § 768.72.

COUNT IV – Libel Per Se
(By Giordano against Romeo)

41. Giordano repeats, re-alleges and incorporates by reference paragraphs 1-18 as if fully set forth herein.

42. Romeo made false statements against Giordano in his capacity as the director of G & G, including falsely accusing Giordano of being a convicted felon.

43. These false statements were published to third parties, indeed, to the entire world, via publication on the World Wide Web.

44. When considered alone and without innuendo, these statements tended to injure Giordano in his trade and business and subjected Giordano to hatred, distrust, ridicule, contempt, and disgrace.

45. Defendant Romeo made these statements with a reckless disregard for the truth and

without reasonable grounds for her to believe they were true.

46. As a result of the publication, Giordano has been injured in his good name, credit and reputation.

47. The damage to Giordano's reputation was proximately caused by Romeo's publication of the statements.

WHEREFORE Plaintiff Giordano demands judgment for damages against Defendant Romeo for general damages, special damages, as well as awarding attorney's fees, costs, and expenses incurred in prosecuting this action pursuant to Fla. Stat. § 57.105, and granting such further relief as this Court deems just and equitable. Further, because of Defendant Romeo's malice in publishing the defamatory statements, Giordano reserves the right seeks punitive damages upon subsequent Motion filed with the Court pursuant to Fla. Stat. § 768.72.

COUNT V – PERMANENT INJUNCTION
(By All Plaintiffs against Xcentric)

48. Plaintiffs hereby incorporate paragraphs 1 through 18 as if fully set forth herein.

49. There is a likelihood that Plaintiffs will suffer irreparable harm as a result of Xcentric's continued republication and hosting of defamatory statements against them.

50. Plaintiffs do not have an adequate remedy at law, because Xcentric's continuous republication of the defamatory statements will subject Plaintiffs to ridicule and disgrace in their community and profession for which monetary damages will provide no relief.

51. There is a substantial likelihood that Plaintiffs will eventually prevail on the merits.

52. The threatened injury to Plaintiffs outweighs whatever damage the proposed injunction may cause Xcentric.

53. An injunction, if issued, would not be adverse to the public interest. In fact, the public interest would be served by the Court ordering a website providing information about a business

and individual in Florida to ensure that such information is truthful, accurate, and non-defamatory.

WHEREFORE, Plaintiffs request this Court enter a Permanent Injunction (1) requiring Defendant Xcentric to immediately remove the false defamatory information about Mr. Giordano and G & G; and (2) enter any such other and further relief this Court deems equitable and just.

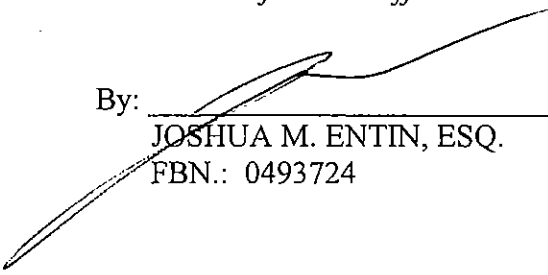
DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial of all issues so triable.

Dated: September 17th, 2009

Respectfully submitted,

ROSEN SWITKES & ENTIN P.L.
407 Lincoln Road, Penthouse SE
Miami Beach, FL 33139
(p)(305) 534-4757
(f)(305) 538-5504
Counsel for Plaintiffs

By: 

JOSHUA M. ENTIN, ESQ.
FBN.: 0493724

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G & G Holistics Addiction Treatment Center - G&G HOLISTIC CAN BE DANDEROUS TO ONE'S HEALTH AND WELL BEING ! North Miami Beach Florida

G & G Holistics Addiction Treatment Center
1590 N.E. 162nd Street,
North Miami Beach, Florida
33162

Phone: 305-945-8284



U.S.A.

Fax:

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oldsmar,
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Submitted: Wednesday, July 08, 2009
Modified: Wednesday, July 08, 2009

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Ripoff Report Verified Safe

This place is mind f---ing at its finest. The owners and employees are not adequately educated to deal with the problems they advertise they expertise in. Not only do they claim to be specialists in treating alcohol and drug additions, but they also have vested interest in dealing with sexual addtions,gambling, eating disorders, pain management due to surgery, and according to their words quoted in the South Fl. Business Journal, they also specialize in anxiety, depression, bipolar disorders, and hurricane relief. As a client, you are mixed in with people who have all these types of additions and disorders, and everyone participates in the same schedule, no matter what their problem. There is plenty of negative talk about the consequences of your addition/behaviors, like death or insanity, but coping skills after your departure from this "safe haven" are not taught. This is why they have as high suicide rate of their former clients. (while I was there, in June 2009, a young man killed himself after only two weeks of leaving G & G.. They estimate that there is at least 8 client suicides a year that are reported).

There are constant NA and AA meetings throughout the day, accompanied by the staff counseling meetings,from approximately 7 am to 9:30 pm daily.. The majority of personnel are recovering addicts and have no business counseling their "clients." These employees also illegally disburse prescribed medications, not possessing a license to do so, and frequently make errors in doing so resulting in many "clients" having to be hospitalized.

The living accomodations, an outdated motel in a questional part of

North Miami are outdated and unsanitary. There is a sewage problem which results in an odor permeating the facility, a problem with sand fleas (bed bugs), inadequate electrical supply, and fire hazards. The food is not organic nor is it prepared by chefs, as is advertised. You are fed from styrofoam containers with plastic forks and knives. Hardly indicative of a "holistic" facility. You are made to listen to an eerie tune which is piped throughout the intercom system that one owner, John Giordano claims to have subliminal messages. You are constantly being sold on "Phase II" of your program which is over and above your initial 28 days, which they will personally finance for you. They will also send a representative to your home, no matter how far, to conduct an intervention on your troubled loved one and personally escort them back to G & G. Although they claim to be wheelchair accessible they are not. Each morning you are given a vitamin/amino acid drink, to supposedly balance your brain chemistry (the personnel who is passing it out has no idea what's in these concoctions, but strongly advise you to drink it - let me remind you that everyone's nutritional needs are different as well as everyone's brain chemistry).

Your privacy and dignity are stripped. Employees constantly rummage through your belongings in your absence, and enter your room about 6 times during your sleep time, if you are fortunate to be able to sleep.

Detox, Highpoint, is a joke. You are not detoxed there, just changed to a medication similar to what you were on. You are told you would be in the detox facility for 7 - 10 days, but it is simply a holding facility for Holistics, until they have a bed for you which usually takes 2 to 5 days. I arrived at Highpoint on Saturday and was at at Holistics on Tuesday. Holistics claims they are not affiliated with Highpoint, but funny how their chief psychiatrist, Dr. Stephen Kahn, lists this address as his place of practice, not Holistics .Holistics is where your detoxification occurs, when you are cold turkeyed from all of your medications. Many clients become so ill that they are hospitalized and/or sent back to the detox center.

I am am 54 professional woman/mother who was told I would be with others similar to myself. The average age of the clients is 18-25, most with sever drug problems and a few sexual addicts thrown in the mix. My habit was wine, 2 to 4 glasses daily. I was also on a small dosage of Klonopin, a popular prescribed anti-anxiety drug as I was diagnosed with anxiety-panic disorder as a teenager. I should have never been taken off this medication at all, especially as abruptly as I was. I became deathly ill due to a drug interaction from medications prescribed by their psychiatrist. I was not hospitalized, as I should have been, but just led to bed by a staff member who told me I was suffering from an anxiety attack, which I was not.

My entire experience lasted only 11 days, for which my insurance

and I paid approximately \$27,000.00 I will fight for the reimbursement, As for my drinking problem, I was scared straight, but I am again on anti-anxiety medication. Don't let this happen to you. Oh yes, one of the owners is a convicted felon. Read all about it -http://neuro.law.cornell.edu/nyctap/search/display.html?terms=fin&url+nyctap/195_0309.htm. He is underhanded, uncompassionate and after your money. This is really worth your search, it was a "family" business, if you know what I mean.

Lastly, you should know that G & G has 100's of search engines and domain names, leading to the same sales office. Just google any addiction, disorder, or behavioral problem, and you'll find G & G Holistics.

Donna
Tampa Bay, Florida

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