

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

MANUEL VON RIBBECK,

Plaintiff,

v.

THE CHICAGO SUN-TIMES,

Defendant,

Case Number:

08 - 09610 CA 13

Damages Claimed: \$1,500,000.00

Return Date:

\$256  
#9925

HARVEY RIVIN  
CIRK. CIRCUIT & COUNTY CTS  
MIAMI-DADE COUNTY, FLA.  
CLERK DIVISION

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COMPLAINT

NOW COMES the Plaintiff MANUEL VON RIBBECK Pro Se and alleges as follows:

STATEMENT OF FACTS

1. Plaintiff, Manuel von Ribbeck, is a citizen of the State of Illinois and specializes in representing clients that have died or been injured in airplane crashes worldwide.
2. Defendant, *The Chicago Sun-Times*, is a newspaper circulated and doing business in Miami-Dade County, Florida.
3. On January 26, 2006, *The Miami Daily Business Review*, in the Volume 80, Number 158 edition of its newspaper, published an article titled "Cross-border chase" (attached hereto as Exhibit A).
4. The article describes alleged misconduct by a group of lawyers in the solicitation of family members of individuals who were killed in a Chalk's Ocean Airways Miami crash on December 19, 2005.

5. The Plaintiff is one of the lawyers mentioned in this article. The article states the following words about the Plaintiff:

- a. He engaged in misconduct in the solicitation of family members of individuals who were killed in a Chalk's Ocean Airways Miami crash.
- b. He "posed as a psychiatrist and Red Cross volunteer and knocked on the doors of the grieving families as early as the day of the crash."
- c. He violated federal law governing the solicitation of plane crash clients
- d. He illegally "handed out business cards."
- e. He held a "meeting at the local Sunday school and encouraged the family members to share their grief."
- f. He explained to the families "We can also give you legal representation."

6. On February 7, 2006, Defendant, *Chicago Sun-Times*, published an article written by Abdon M. Pallash titled, "Did lawyer claim he was Red Cross Official?: state agency probes," which disclosed similar details of the alleged misconduct (attached hereto as Exhibit B).

7. In addition to the specific statements of Co-Defendants John Ruiz and Kendrick Sherman listed below; *Chicago Sun-Times* article states the following defamatory and false statements about the Plaintiff:

- a. "A Chicago lawyer posed as a Red Cross official to sign up relatives of two victims of a Miami Beach plane crash as clients."
- b. "The people who shook Kendrick's hand and comforted him outside the fishing club, telling him they were from the Red Cross."
- c. "This is not the first time Ribbeck has been accused of skirting the rules to sign up airplane-crash clients for the Nolan firm."

- d. "The male 'Red Cross' representative actually had nothing to do with the agency -- he was lawyer Manuel Ribbeck, also known as Manuel von Ribbeck."
- e. "They told me they were from the Red Cross organization, that they were helping families that survived, whatever they may need,"
- f. "invited me to the hotel they were staying at,"
- g. "They had a video projector and they started to tell me about this Nolan Law Group. I started to wonder about whether they are from the Red Cross like they said. They started to tell me they represent plenty of people from plane crashes before. They even gave me a folder with the 'Nolan Law Group.' I took it and I told them I already got my lawyer. . . . I feel like this was wrong. They are appealing to people in distress. They had lied to me."

8. Authors of the *Chicago Sun-Times* article described the aforementioned article in *The Miami Daily Business Review* as the source of disclosure of the alleged misconduct. The *Chicago Sun-Times* is a highly popular, respected, and widely circulated newspapers within Plaintiff's home state, the United States, and worldwide.

9. *Chicago Sun-Times* newspaper has an extensive circulation in the County of Miami-Dade, and throughout the State of Florida. Its editorial and news items are extensively reprinted and commented on by many of the leading newspapers, internet, radio and television stations, and other media of communication in the State of Florida.

10. On, January 17, 2008, the Plaintiff notified Defendant of his intent to sue for libel, as required under Title XLV Section 770.1 of the Florida Statute.

COUNT I  
LIBEL

11. Plaintiff restates and re-alleges paragraphs 1 through 10 from above Statement of Facts and incorporates them by reference as if fully set forth herein.

12. By the words published in such newspaper, Defendant meant to describe the Plaintiff as having participated in illegal conduct in the solicitation of family members of those killed in Chalk's Ocean Airways Miami crash.

13. By the words published in such newspaper, Defendant meant to portray Plaintiff as untrustworthy, dishonest, deceitful, and of poor moral turpitude.

14. The matter so published was untrue, false and defamatory.

15. Defendant publication of said article was made with the full knowledge of the foreseeable risk of harm to Plaintiff's reputation.

16. Plaintiff has always enjoyed a good reputation for honesty and uprightness of character.

17. Because of the publication, plaintiff has been damaged in the sum of calculated to cause, great injury to plaintiff's reputation, in that current and prospective clients may read said article in its print for or on the internet and not do business with Plaintiff.

18. As a result of Defendants' statements, Plaintiff sustained the following damages:

a. General damages in the sum of one-million (\$1,000,000.00) dollars

WHEREFORE, plaintiff request judgment against defendants for:

1. General damages in the amount of one-million (\$1,000,000.00) dollars.
2. Cost of suit; and
3. Such other and further relief as this court may deem just and proper

COUNT II  
INTERFERENCE WITH EXISTING AND  
PROSPECTIVE BUSINESS RELATIONSHIPS

19. Plaintiff restates and re-alleges paragraphs 1 through 10 from Statement of Facts above and incorporates them by reference as if fully set forth herein.

20. Plaintiff restates and re-alleges paragraphs 11 through 17 from Count I above and incorporates them by reference as if fully set forth herein.

21. Plaintiff has been retained to represent certain individuals in the action against Chalk's Ocean Airways for the Miami flight crash.

22. Plaintiff was engaged in discussion with other individuals for the purpose of representing them in an action against the airline prior to the publication of the article at issue.

23. Plaintiff has been unable to obtain such potential clients' business in light of the damage to his reputation produced by the false allegations and publication of the article at issue.

24. Plaintiff had a substantial likelihood of representing such clients had it not been for the publication of the article at issue.

25. Defendant knew or should have known the foreseeable of risk of harm to Plaintiff's ability to secure and ensure the representation of current and potential clients in Chalk's Ocean Airways Miami crash and future clients from airplane crashes worldwide.

26. Despite the foreseeable risk of harm to Plaintiff, Defendant falsely represented events published the said article.

27. As a direct and proximate result of the Defendant statements and causing of said article to be published, Defendant substantially interfered with Plaintiff's relationship with existing clients by preventing Plaintiff from completing Plaintiff's representation of client and from obtaining any compensation from the action against Chalk's Ocean Airways.

28. As a direct and proximate result of the publication of the article at issue, Defendants substantially interfered with Plaintiff's ability to obtain potential clients in the representation against Chalk's Ocean Airways and other future clients resulting from airplane crashes.

WHEREFORE, Plaintiff requests judgment against Defendant for:

1. Damages in the sum of five-hundred thousand (\$500,000.00) dollars
2. Cost of suit; and
3. Such other and further relief as the court may deem just and proper.

Respectfully submitted,



Manuel von Ribbeck

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