

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA**

CASE NO:

CHANTEL JEFFRIES,

Plaintiff,

vs.

**NEW YORK DAILY NEWS
COMPANY, a New York
Corporation, and
DAILY NEWS, L.P.,
a Delaware Limited Partnership,**

Defendants.

/

COMPLAINT

Plaintiff, CHANTEL JEFFRIES, through her undersigned counsel, Morgan & Morgan, P.A., sues Defendants, NEW YORK DAILY NEWS COMPANY and DAILY NEWS, L.P., for their defamatory and unlawful acts alleged below:

1. This is an action for damages that exceed Fifteen Thousand Dollars (\$15,000.00), exclusive of interest, costs, and attorney's fees.
2. Plaintiff, CHANTEL JEFFRIES ("Jeffries" and/or "Plaintiff"), seeks to recover damages for defamatory statements published by the NEW YORK DAILY NEWS COMPANY and DAILY NEWS, L.P. (collectively referred to as "NYDN" and/or "Defendants"), which wrongfully accused Jeffries of having an extensive criminal arrest record and "rap sheet". The subject articles contained statements concerning Plaintiff which were false, defamatory and injurious to her professional and personal reputation.

PARTIES

3. Jeffries is an individual who resides and does business in Florida.

4. Jeffries is a student, professional model, and entrepreneur and is currently represented by Wilhelmina Models a/k/a Wilhelmina International, Inc., one of the preeminent model management firms in the world.

5. NYDN is, upon information and belief, a foreign corporation organized and existing under the laws of the State of New York, with its principal place of business located at 4 New York Plaza, New York, NY 10004.

6. Daily News, L.P. is, upon information and belief, a Delaware limited partnership organized and existing under the laws of the State of Delaware, with its principal place of business located at 4 New York Plaza, New York, NY 10004.

7. Upon further information and belief, NYDN is a hard-copy and online tabloid newspaper, publicly available on the Internet that primarily publishes gossip about current events and other personalities.¹

JURISDICTION AND VENUE

8. Jurisdiction and venue are proper in this Court in that Jeffries resides in and has suffered injury in Florida as a result of Defendants' tortious act of publishing defamatory statements about her on the Internet. The defamatory statements were published to millions of people in the United States, including persons in the State of Florida. Further, NYDN transacts continuous and systematic business in Florida and in this judicial district. Further, NYDN's defamatory statements were continuously transmitted in this judicial district.

¹ NYDN is the *fourth* most widely circulated daily newspaper in the United States.

9. Defendants are subject to the jurisdiction of the courts of the State of Florida under section 48.193, Florida Statutes, because Defendants, among other things: (a) operated, conducted, or engaged in business in Florida; (b) committed tortious acts within Florida; and (c) caused injury to persons in Florida arising out of acts or omissions by Defendants outside of Florida while engaged in solicitation or service activities in Florida. Moreover, Defendants are subject to jurisdiction under section 48.193(2), Florida Statutes, because they were engaged in substantial and not isolated activity within the state of Florida.

10. Venue lies in this Court pursuant to section 47.051, Florida Statutes, Florida Statutes, because the causes of action described herein accrued in Florida, including but not limited to Orange County, Florida.

11. All conditions precedent to the bringing of this action have occurred, been performed, been waived, or are futile.

NATURE OF THE ACTION

12. On or about January 23, 2014, Jeffries was involved in a traffic incident in Miami Beach, Florida (the “Traffic Incident”). Jeffries was a front-seat passenger in the car at the time of the Traffic Incident.

13. The Traffic Incident involving Jeffries received and continues to receive widespread media attention.

14. Between January 23, 2014 and January 25, 2014, NYDN published media articles which wrongfully accused Jeffries of having an extensive criminal record and “rap sheet” (the “Articles”).

15. On January 23, 2014, NYDN published to millions of people an article which stated:

Model [Chantel Jeffries] has long criminal record

The sexy blond . . . is also no stranger to trouble. . . .

Chantel Jeffries' rap sheet lists five arrests

A true and correct copy of the January 23, 2014 article is attached hereto as ***Exhibit "A."***

16. On January 25, NYDN continued to defame Jeffries by publishing an article which accuses Jeffries of being the mastermind behind a well-known celebrity's alleged illegal activities. A true and correct copy of the January 25, 2014 article is attached hereto as ***Exhibit "B."***

17. The statements in the Articles concerning Jeffries, reproduced above, are false and libelous and state facts about Jeffries which are false.

18. The Articles explicitly and unambiguously refer to Jeffries.

19. The Articles refer to Jeffries by name and by publishing her image throughout, were made of and concerning Jeffries, and were so understood by those who read the Articles.

20. The statements about Jeffries were falsely, maliciously, and intentionally published by NYDN and were known by NYDN to be false at the time they were made.

21. NYDN published these statements negligently, or with actual malice and with the intent to cause harm to Jeffries.

22. NYDN is publicly available on the Internet and has been viewed by and communicated to an unknown number of third-parties, including individuals in the State of Florida and throughout the United States and the world.

Count I
(Libel *Per Se*--Injury to Professional Reputation)

23. Plaintiff repeats and incorporates by reference paragraphs 1 through 22 above as though fully set forth herein.

24. A cause of action for libel under Florida law accrued in Florida because NYDN's libelous statements were published in Florida.

25. Jeffries has enjoyed a good reputation generally in her occupation and business as a professional model.

26. By publishing the Articles online and making them publically available on the Internet, NYDN intended to communicate to others the false statements in the Articles.

27. The statements in the Articles are false because Jeffries has not been arrested five (5) times, nor is she the "mastermind" of any alleged criminal activity. NYDN knew, or should have known that the statements were false when made, or did not exercise reasonable care in verifying the truth or falsity of such statements before transmitting and publishing these statements without good motives, or recklessly disregarded the truth or falsity of the statements.

28. By publishing the Articles, NYDN sought to injure and disparage Jeffries' personal and professional reputation. The Articles about Jeffries are libelous on their face. The Articles accuse Jeffries of criminal activity and exposes her to hatred, contempt, ridicule and obloquy because it inaccurately portrays Jeffries as a criminal with an extensive criminal record.

29. The Articles are libelous *per se* because: (a) the Articles are in printed form and are thus, libel; (b) the Articles are libelous *per se* because they injured Jeffries' professional reputation; and (c) the Articles falsely claims that Jeffries has been arrested five (5) times, is a criminal mastermind and engaged in further criminal conduct and other violations of law.

30. The Articles adversely affect Jeffries' reputation and in her professional life as a model, student and entrepreneur and Jeffries has been damaged by their publication.

31. NYDN's actions in knowingly publishing the false statements were intentional and done with express and implied malice. NYDN knew, or should have known that the Articles contained false statements before they were published. Nonetheless, NYDN published such false statements recklessly and in conscious disregard of the truth. Further, NYDN committed such acts maliciously, oppressively, fraudulently, with ill will and an evil intent to defame and injure Jeffries.

32. As a direct and proximate of the Articles and NYDN's conduct, Jeffries has suffered, and continues to suffer, humiliation, embarrassment, emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, damage to her reputation, and other non-pecuniary losses for which compensatory damages should be awarded.

33. As a direct and proximate of the Articles and NYDN's conduct, Jeffries suffered emotional pain, suffering, inconvenience and mental anguish, loss of enjoyment of life, loss of dignity, emotional distress, humiliation, and other non-pecuniary losses and intangible injuries.

WHEREFORE, Plaintiff, Chantel Jeffries, demands judgment for damages against Defendants, New York Daily News Company and Daily News, L.P., and for such other relief deemed just and proper by the Court.

Count II
(Libel *Per Se*--Injury to Personal Reputation)

34. Plaintiff repeats and incorporates by reference paragraphs 1 through 33 above as though fully set forth herein.

35. The Articles contained false statements about Jeffries.

36. The Article were widely published by NYDN and not privileged in any manner.

37. The Articles were published without good motives by NYDN with reckless disregard of their truth or falsity, and/or with malice.

38. The Articles are libelous *per se* because: (a) the Articles are in printed form and are thus, libel; (b) the Articles are libelous *per se* because they injured Jeffries' personal reputation; and (c) the Articles falsely claim that Jeffries has been arrested five (5) times, is a criminal mastermind and engaged in further criminal conduct and other violations of law.

39. NYDN's actions in knowingly publishing the false statements were intentional and done with express and implied malice. NYDN knew, or should have known that the Articles contained false statements before they were published. Nonetheless, NYDN published such false statements recklessly and in conscious disregard of the truth. Further, NYDN committed such acts maliciously, oppressively, and fraudulently, with ill will and an evil intent to defame and injure Jeffries.

40. As a direct and proximate of the Articles and NYDN's conduct, Jeffries has suffered, and continues to suffer, humiliation, embarrassment, emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, damage to her reputation, and other non-pecuniary losses for which compensatory damages should be awarded.

41. As a direct and proximate of the Articles and NYDN's conduct, Jeffries suffered emotional pain, suffering, inconvenience and mental anguish, loss of enjoyment of life, loss of dignity, emotional distress, humiliation, and other non-pecuniary losses and intangible injuries.

WHEREFORE, Plaintiff, Chantel Jeffries, demands judgment for damages against Defendants, New York Daily News Company and Daily News, L.P., and for such other relief deemed just and proper by the Court.

Count III
(Intentional Infliction of Emotional Distress)

42. Plaintiff repeats and incorporates by reference paragraphs 1 through 41 above as though fully set forth herein.

43. The acts and/or omission of acts of NYDN involved extreme and outrageous conduct which causes Jeffries to suffer severe emotional distress.

44. The acts and/or omission of acts of NYDN involved a deliberate or reckless infliction of mental suffering, in that NYDN intended its behavior, when it knew, or should have known, that emotional distress of Jeffries would likely result.

45. The conduct of NYDN exceeded the bounds of decency in a civilized society and was such that a person of normal sensibility upon hearing what NYDN did would exclaim, “outrageous”.

46. As a result of the infliction of emotional distress by NYDN, Jeffries has suffered damages to include, but not limited to, a loss of liberty, humiliation, harassment, mental suffering and pain, loss of family relationships, damage to reputation, and other damages which are permanent or continuing in nature.

WHEREFORE, Plaintiff, Chantel Jeffries, demands judgment for damages against Defendants, New York Daily News Company and Daily News, L.P., and for such other relief deemed just and proper by the Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Chantel Jeffries seeks judgment as follows:

- i) Awarding Plaintiff all compensatory damages she has suffered, including consequential and incidental damages, as a result of NYDN’s wrongful conduct in an amount to be determined at trial;

- ii) Granting preliminary and permanent injunctive relief to prevent NYDN from making further false, misleading, and malicious statements concerning Plaintiff;
- iii) Awarding Plaintiff her costs, expenses and attorney's fees incurred in connection with this action; and
- iv) For such other relief deemed just and proper by the Court.

JURY DEMAND

Plaintiff demands a trial by jury trial by jury on all issues so triable.

Respectfully submitted,

/s/ Andrew Parker Felix

Andrew Parker Felix, Esq.

FBN 0685607

Matthew T. Morgan, Esq

FBN 088224

Michael N. Hanna, Esq.

FBN 085035

Morgan & Morgan, P.A.

20 N. Orange Ave., 16th Floor

P.O. Box 4979

Orlando, FL 32802-4979

Telephone: (407) 420-1414

Primary email: AFelix@forthepeople.com

Secondary email: KDimeglio@forthepeople.com

Attorneys for Plaintiff

VERIFICATION

I, Chantel Jeffries, under penalty of perjury under the laws of the State of Florida, declare that I have read the foregoing Complaint and that the facts alleged therein are true and correct to the best of my knowledge and belief.



Chantel Jeffries

Dated this 03 day of March, 2014.

DAILY NEWS

GOSSIP

Who is Justin Bieber's gal pal Chantel Jeffries? Model has long criminal record, including assault with deadly weapon

Bieber was taken into custody in the early morning hours of Thursday for drag racing and driving under the influence with a blond beauty by his side.

BY RACHEL MARESCA , NANCY DILLON AND CORKY SIEMASZKO / NEW YORK DAILY NEWS

PUBLISHED: THURSDAY, JANUARY 23, 2014, 11:18 AM

UPDATED: THURSDAY, JANUARY 23, 2014, 11:47 PM



Justin Bieber seen leaving SET nightclub with Chantel Jeffries on Wednesday in Miami.

The sexy blond who was riding shotgun in the Lamborghini when Justin Bieber was busted in Miami Beach for drunken drag-racing is also no stranger to trouble.

Chantel Jeffries' rap sheet lists five arrests, including one in Feb. 2011 for misdemeanor assault with a deadly weapon.

The 21-year-old model, who hails from Jacksonville, N.C., stabbed another woman in the left forearm "during a physical altercation," records revealed Thursday.

RELATED: JUSTIN BIEBER ARRESTED IN MIAMI FOR DRAG RACING, DUI

Exhibit "A"



CHANTELJEFFRIES VIA INSTAGRAM

Chantel Jeffries seen here in some photos from her Instagram page.

But the victim "did not want to proceed with the matter" and the charge was dropped after Jeffries agreed to pay for the court costs, the papers showed.

Jeffries also apparently shares Bieber's need for speed. She wound up in handcuffs once after she was caught doing 92 mph in a 70 mph zone, The Daily Mail reported.

"Something about the shock factor," she tweeted before went on the alleged joyride with the 19-year-old pop sensation Thursday.

PHOTOS: JUSTIN BIEBER ARRESTED: MEET HIS MYSTERY GAL PAL CHANTEL JEFFRIES



OSCEOLA COUNTY

The 2011 mug shot of Chantel Jeffries, who was with Justin Bieber when he was arrested

Little did she know.

Jeffries, a southern girl with a curvy 32-23-35 figure who hails from Jacksonville, N.C., describes herself on her Twitter biography as a "student, eyebrow connoisseur, animal lover, and deep thinker."

But up until the bust with Bieber, the hazel-eyed Jeffries was better known as being arm candy.





PHOTO BY INSTAGRAM

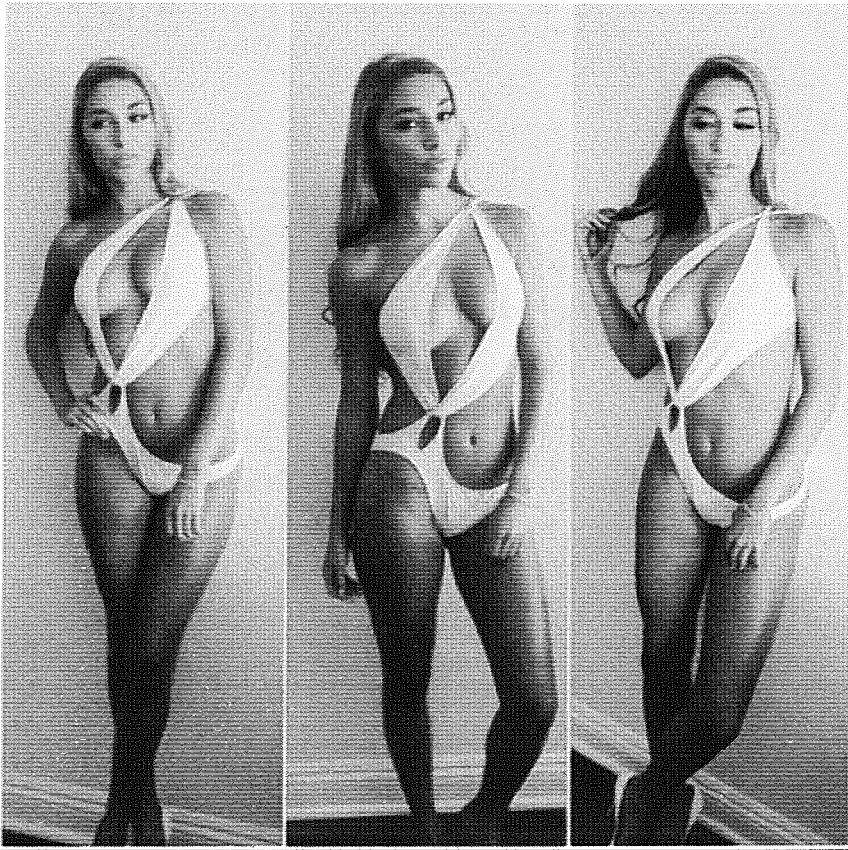
Justin Bieber in a yellow lamborghini on Wednesday alongside model Chantel Jeffries.

She has dated Diddy's son Justin Combs, Philadelphia Eagles receiver DeSean Jackson, and even Bieber's buddy rapper Lil Twist.

Evidently Jeffries' aunt, who lives outside of Boston, was not aware of her niece's racy lifestyle.

"She truly is an honest, Christian girl," Nancy McCluskey, 39, of Billerica, Mass., told the Daily News. "She's a very well-rounded and intelligent individual, so it's kind of shocking to hear she was present for this."

RELATED: JUSTIN BIEBER IS A 'NORMAL' KID, SAYS MODEL CARMEN ORTEGA



CHANTELJEFFRIES VIA INSTAGRAM

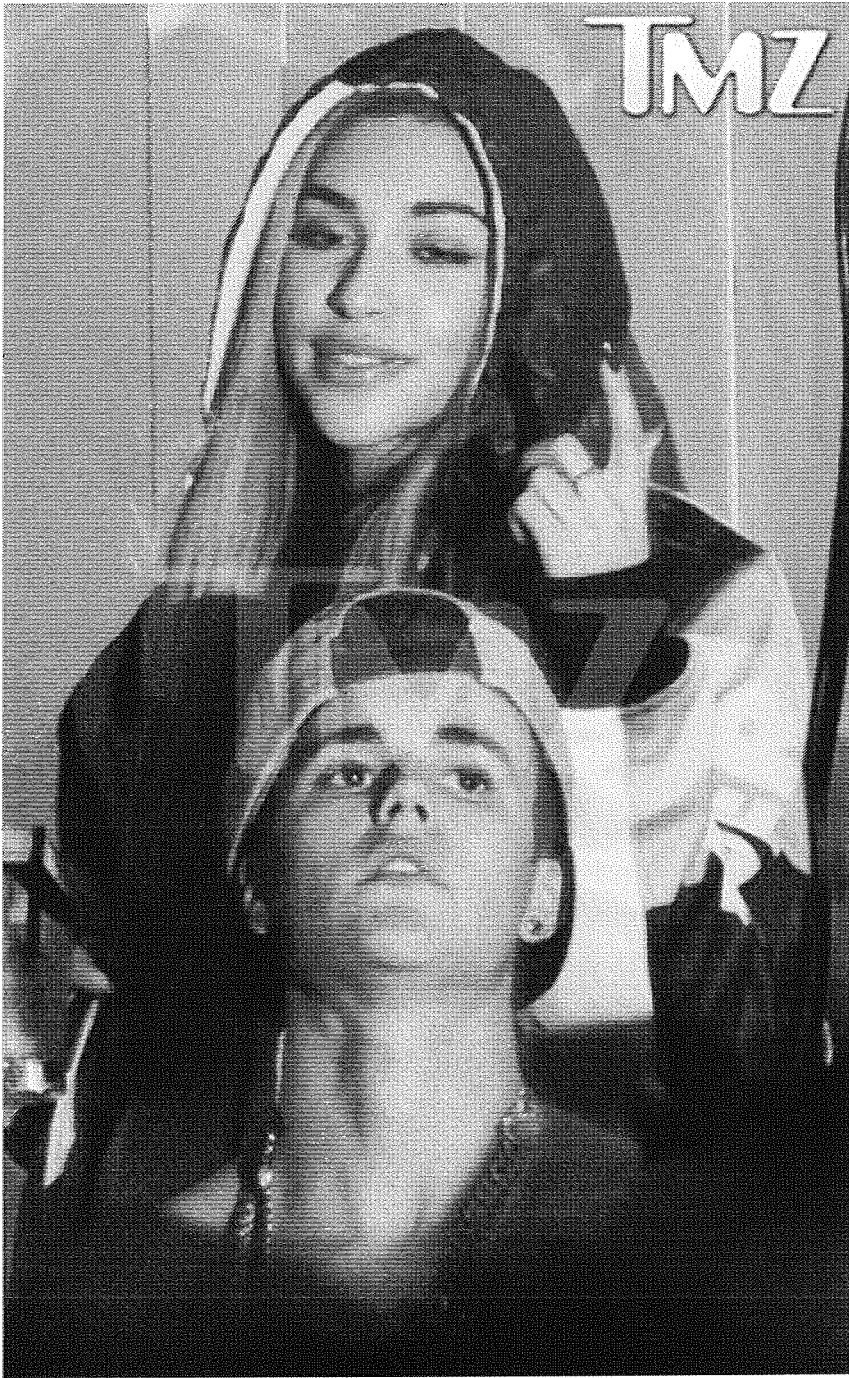
Chantel Jeffries flaunting her bathing suit body in an Instagram upload.

McCluskey said she didn't know Jeffries was hanging with Bieber.

"I don't know what she was doing with him, but it's shocking she was even associated with someone exhibiting that kind of behavior," the aunt said. "She was born and raised Christian. She's a church-going girl."

Asked if Jeffries had any history of drag racing, the aunt laughed. "God no. She's never been in trouble for drag racing," McCluskey said.

PHOTOS: JUSTIN BIEBER ARRESTED: HOW HE WENT FROM TEEN IDOL TO WILD CHILD



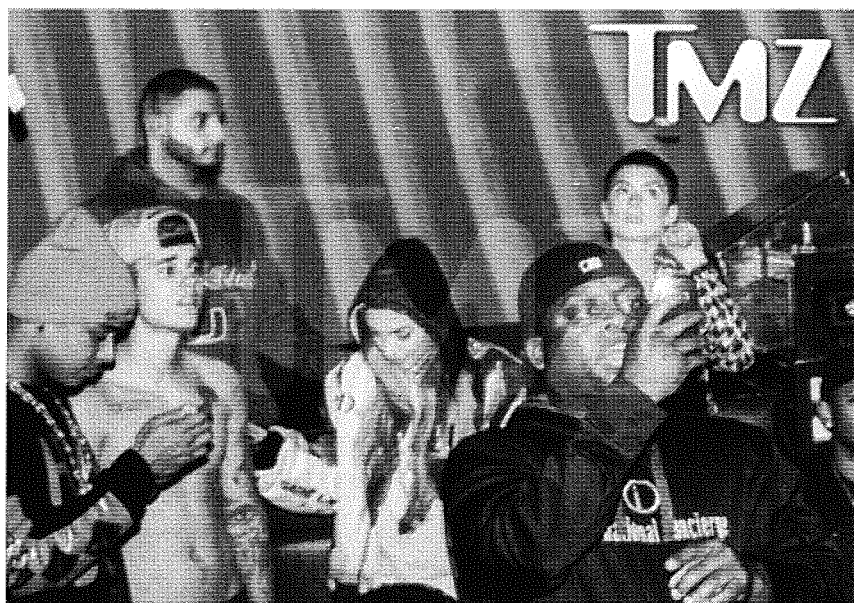
Justin Bieber and Chantel Jeffries partying inside SET Nightclub in Miami before the arrest.

Jeffries has not been charged with a crime. But Bieber implicated her in an Instagram upload that was later removed.

The "Boyfriend" singer posted a pic of himself behind the wheel of the Lamborghini with Jeffries by his side.

"@chanteljeffries taking me for a ride in the lambo," he captioned the photo late Wednesday.

RELATED: JUSTIN BIEBER TEAM URGING SINGER TO GO TO REHAB: REPORT



Justin Bieber and Chantel Jeffries in photographs obtained by TMZ at SET Nightclub in Miami before he was arrested.

It remains unclear whether Biebs and Jeffries are an item or just party pals.

They were hanging out together for most of the evening before the arrest.

In photos obtained by TMZ.com, Bieber was spotted shirtless at SET Nightclub in Miami with Jeffries and his entourage.

Several hours later, Bieber and Jeffries were at the corner of West 41st St. and Pine Tree Drive being grilled by the police.

Bieber was arrested and charged with driving under the influence, speeding, resisting arrest, and driving with an expired license, police said.

csiemaszko@nydailynews.com

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DAILY NEWS

GOSSIP

Justin Bieber spotted with Chantel Jeffries on Panama beach two days after DUI arrest

The 19-year-old pop star left Miami, where he was arrested on Thursday, to soak up the sun with his new gal pal. A source tells the Daily News that the drag race that led to Bieber's arrest was Jeffries' idea: 'She would be the prize.'

BY LISA LUCAS, NANCY DILLON AND STEPHEN REX BROWN / NEW YORK DAILY NEWS

SATURDAY, JANUARY 25, 2014, 5:15 PM



Justin Bieber and lady friend Chantel Jeffries were spotted in Punta Chame, a beach town on the Gulf of Panama.

The Biebs has high-tailed it to a place where he can drink in peace — Panama.

A source close to Justin Bieber confirmed Saturday to the Daily News that the embattled teen pop star had fled Miami and arrived in Punta Chame — a scenic beach town on the Gulf of Panama.

Exhibit "B"



EDDY VASQUEZ

Bieber enjoys the tropical Central American weather with new gal pal Jeffries.

Tweets from the 85-degree Central American paradise showed a shirtless Bieber, 19, strolling on the sand with his new lady friend, Chantel Jeffries, and two other members of his entourage — one of whom appeared to be carrying a beer bucket.

Panama's legal drinking age is 18.



EDDY VASQUEZ

A source close to Justin Bieber confirmed to the Daily News that the embattled pop star had fled Miami for Punta Charrie.

Other pics posted online by die-hard Beliebers showed the hard-partying pop star at a Panama airport and preparing to hop aboard a watercraft.

Bieber's topical and tropical vacation comes after a week of rowdiness in Miami that culminated Thursday with the once-squeaky-clean pop star being charged with misdemeanor driving under the influence, resisting arrest without violence and driving with an expired Georgia license.



EDDY VASQUEZ

Bieber, Jeffries and two other members of his entourage strolled the sand together.

Miami Beach cops said they spotted Bieber driving a rented \$260,000 Lamborghini Gallardo, with Jeffries riding shotgun, at 4:09 a.m. on a quiet residential street.

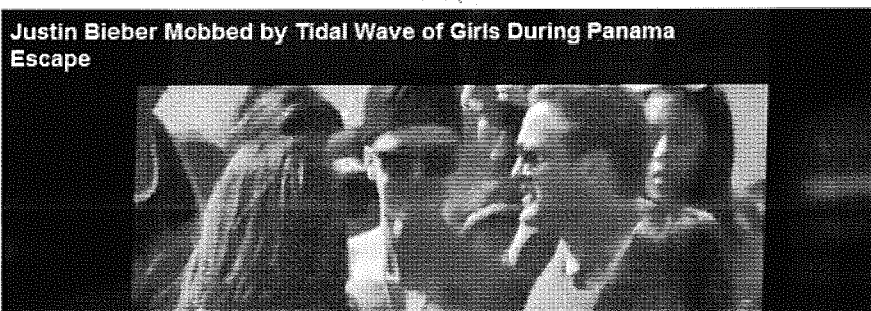
Cops said Bieber was racing R&B singer Khalil Sharieff, 19, who was driving a red Ferrari.



EDDY VASQUEZ

One member of Bieber's crew appeared to be carrying a beer bucket. Panama's legal drinking age is 18.

Sharieff was charged with DUI and drag racing.



Justin Bieber Mobbed by Tidal Wave of Girls During Panama Escape



EDDY VASQUEZ

Bieber's tropical vacation comes after a week of rowdiness in Miami that culminated Thursday with the pop star being charged with misdemeanor driving under the influence. Here, Bieber, Jeffries and his entourage on the beach in Panama.

The idea for the ill-fated race was the 21-year-old Jeffries', according to a source at SET nightclub, where Bieber partied before being slapped in cuffs.

"Chantel dared them to race each other, and said that she would be the prize," the source told the Daily News Saturday.



EDDY VASQUEZ

Bieber and crew relaxed after the pop star's week of rowdiness in Miami.

The source added that Bieber was sitting at a table at the nightclub that was covered in bottles of champagne, beer and vodka — but the source never saw the star take a sip.

Bieber and Jeffries weren't all over each other at the club, either, the source said.

Shortly after leaving the club, cops said they caught Bieber racing.

The belligerent Bieber admitted to being high on pot, anti-depressants and beer, according to a police report.

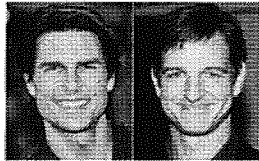
Behind the scenes, the Bieber camp was already questioning cops' version of events, noting that the singer's blood-alcohol level was only .014% — below the .08% legal limit for drivers 21 and over, and also below Florida's .02% limit for drivers under 21. Upon his release, Bieber posted an image to Instagram drawing parallels between himself and Michael Jackson, who was no stranger to humiliating legal woes.

Bieber's arrest followed a bizarre incident earlier this month in which he allegedly chucked eggs his California neighbor's house.

Rumors have run rampant that Bieber's drinking is out of control and that he's abusing Xanax, leading some in his team, including manager Scooter Braun, to urge him to enter rehab, according to a source.



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