

**IN UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

LARRY KLAYMAN,
6538 Collins Ave, Suite 331
Miami Beach, FL 33141

Plaintiff,

v.

JUDICIAL WATCH, INC.,
425 Third Street SW, Suite 800
Washington, DC 20024

THOMAS FITTON,
425 Third Street SW, Suite 800
Washington, DC 20024

PAUL ORFANEDES,
425 Third Street SW, Suite 800
Washington, DC 20024

CHRISTOPHER FARRELL,
425 Third Street SW, Suite 800
Washington, DC 20024

CONSTANCE RUFFLEY,
2540 Huntington Drive,
San Marino, CA 91108

Defendants.

Case No:

COMPLAINT

Plaintiff, Larry Klayman, hereby sues Defendants Judicial Watch, Inc., Thomas Fitton (Fitton), Paul Orfanedes (Orfanedes), and Christopher Farrell (Farrell), Constance Ruffley (Ruffley) and alleges as follows:

PARTIES, JURISDICTION, AND VENUE

1. This Court has original jurisdiction under the provisions of 28 U.S.C. §1332 because it is a civil action between citizens of different states and the matter in controversy herein exceeds the sum or value of \$75,000, exclusive of interest and costs.
2. Plaintiff Larry Klayman resides in and does business in this judicial district and in 2004 ran as a candidate for the U.S. Senate in Florida in the Republican primary election. He is the founder and former chairman and general counsel of Judicial Watch, and was admitted into The Florida Bar on December 7, 1977. He became a member of the bar of this court in and around this time as well, and has practiced law here continuously and extensively throughout his career, with active cases still pending here and elsewhere in the state of Florida.
3. Defendant Judicial Watch is a 501 (c)(3) corporation that does business in and is headquartered at 425 Third Street SW, Suite 800, Washington, DC 20024.
4. Defendant Fitton is the president and chief operating officer of Judicial Watch and a member of its board of directors.
5. Defendant Orfanedes is a member of Judicial Watch's board of directors.
6. Defendant Farrell is a member of Judicial Watch's board of directors.
7. Defendant Constance Ruffley is the Office Administrator of Judicial Watch in Judicial Watch's Western Regional Office at 2540 Huntington Drive, San Marino, California 91108.

8. The case or controversy arose in large part in this judicial district and Plaintiff was severely harmed and damaged in the district.

THE FACTS

9. Plaintiff Klayman realleges and reincorporates the facts set forth in paragraphs 1 through 8 above.
10. On or about February 22, 2012, Ruffley, a representative and Office Administrator of Judicial Watch, at the direction and with the authority, actual, implied and apparent, of Defendants Judicial Watch, Fitton, Orfanedes and Farrell, in their individual capacity and as members of Judicial Watch's board of directors, had negligently, maliciously and/or willfully published and furthered the publication of a false statement that Plaintiff Klayman had been "convicted" of a crime for not paying a large amount of child support with regard to his children, on the internet and elsewhere within this judicial district, Florida, and elsewhere throughout the United States and the world.
11. The false and defamatory statement alleged herein was intended to be and was published on "The World's Leading Obama Eligibility Website" of Dr. Orly Taitz of the Defend Our Freedom Foundation and disseminated in this district, nationally, and worldwide, causing publication on other internet websites and elsewhere. Discovery will uncover and disclose all of these publications.
12. Prior to the above publication by or on behalf of Defendants, Klayman and others had made it be known that he planned to soon file a high profile case in Florida

involving the eligibility of President Barack Obama to run as a candidate in Florida concerning the state's primary and general elections for 2012.

13. Specifically, by and through through Defendant Ruffley, this false publication was done negligently and/or with the willful and malicious intent to harm Klayman personally and in his profession and trade in the South Florida community, throughout the state, and elsewhere. Plaintiff Klayman is as a lawyer licensed to practice in the state of Florida and elsewhere and has at all times been a member in good standing for going on 36 years. Defendants, each and every one of them, jointly and severally, knew or had reason to know that this statement was false and would harm Plaintiff Klayman.
14. The defamatory statement of Defendants, each and every one of them, jointly and severally, sought to harm and did harm the livelihood and reputation of Plaintiff Klayman by "lowering him in the estimation of the community or, more broadly stated, exposed Plaintiff Klayman to hatred, ridicule, or contempt or injuries to his business or reputation or occupation." *Jews for Jesus, Inc. v. Rapp*, 997 So. 2d 1098, 1108 (Fla. 2008).

COUNT I – DEFAMATION

15. Plaintiff Klayman realleges and reincorporates paragraphs 1 through 14 of this complaint.
16. Defendants Judicial Watch, Fitton , Orfanedes, Farrell, and Ruffley defamed and libeled Plaintiff Klayman per se and otherwise in his trade and profession and personally.

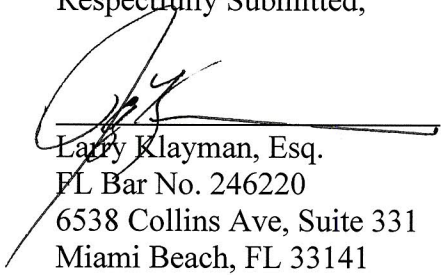
17. Defendants, acting in concert, jointly and severally, caused large actual and compensatory damage to Plaintiff Klayman, as well as damage to his reputation, good will, and livelihood.

WHEREFORE, Plaintiff Klayman prays, in an amount to be determined at trial, for actual and compensatory damages, attorneys fees and costs, punitive damages as may be pleaded later after discovery, and such other relief as this court may deem just and proper, against Defendants, each and every one of them and jointly and severally.

Plaintiff Klayman demands trial by jury.

Dated: February 19, 2013

Respectfully Submitted,



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