

IN THE CIRCUIT COURT IN AND FOR
ORANGE COUNTY, FLORIDA

CASE NO. 2015-CI-_____

Division ____ (Hon. _____)

HELP THE VETS, INC., and
NEIL PAUL PAULSON,

Plaintiff(s),

vs.

FLORIDA DEMOCRATIC
PARTY, JOHN H. DYER, and
CLARK RICKE,

Defendant(s).

_____ /

COMPLAINT

Plaintiffs, NEIL PAUL PAULSON (“PAULSON”) and HELP THE VETS, INC. (“HTV”), sue Defendants, FLORIDA DEMOCRATIC PARTY (“FDP”), JOHN H. DYER (“DYER”), and CLARK RICKE (“RICKE”), and state:

Allegations Applicable to All Counts

1. PAULSON and DYER are residents of Orange County, Florida.
2. FDP is a major political party, registered with the Florida Division of Elections, pursuant to ch. 103, Florida Statutes.
3. Upon information and belief, RICKE is a resident of Pasco County, Florida.
4. PAULSON and DYER are candidates for the November 3, 2015 election for the position of Mayor-Commissioner of the City of Orlando, Florida.
5. HTV is a Florida not-for-profit corporation.

6. PAULSON is the president of HTV.
7. During the year 2013, HTV raised a total of \$1,046,309 through professional fundraisers. The professional fundraisers were paid \$132,257 (or 12%) of that \$1,046,309. PAULSON was paid a salary of \$27,451 for 2013. PAULSON's salary was authorized and approved by the board of directors of HTV. PAULSON's salary of \$27,451 is less than 3% of the total revenues (\$1,046,309) of HTV for the year 2013. Together, PAULSON and professional fundraisers were paid less than 15% of HTV's total revenues for the year 2013.
8. During the year 2014, HTV raised a total of \$2,345,219 through professional fundraisers. The professional fundraisers were paid \$473,222 (or 20%) of that \$2,345,219. PAULSON was paid a salary of \$84,042 for 2013. PAULSON's salary was authorized and approved by the board of directors of HTV. PAULSON's salary of \$84,042 is less than 4% of the total revenues (\$2,393,510) of HTV for the year 2014 . Together PAULSON and professional fundraisers were paid less than 25% of HTV's total revenues for the year 2014.
9. During the week of October 19, 2015, Defendants FDP and DYER caused two mailers (copies attached) to be delivered to households within the city limits of Orlando, Florida, within Orange County, Florida.
10. On one side of the first mailer (copy attached) is a cartoon picture of PAULSON holding a man in a camouflage outfit upside down, with the

caption: “PAUL PAULSON – SHAKING DOWN VETERANS TO PAY HIS SALARY.”

11. On the other side of the mailer, citing HTV’s records for the years 2013 and 2014, the mailer states the following:

- “Paulson collects money for veterans & puts it in his pocket,”
implying PAULSON puts **all** money collected for HTV into his own pocket;
- “Paulson **Took** over \$100,000 in Salary From Money That Was Supposed to Help Veterans,” (emphasis supplied), implying PAULSON had an **annual** salary of in excess of \$100,000 in the years 2013 and 2014 and that his salary was unilaterally **taken** or **stolen** by PAULSON, rather than authorized and approved by others;
- “There is nothing more shameful than this – claiming that you are helping veterans **when you pay yourself** over \$100,000, and **more than 90%** of the money donated to his charities went to **overpriced** fundraisers and his personal salary,” (emphasis supplied), again implying that PAULSON **took** or **stole** his salary, also implying the percentage paid to professional fundraisers was in excess of industry standards, and **expressly** stating that the combination of PAULSON’s salary and the amounts paid professional fundraisers exceeded 90% of HTV’s revenues for the years 2013 and 2014;
- “Over 90% of the Funds Collected for Veterans Go to His Team and His Salary,” again **expressly** stating that the combination of

PAULSON's salary and the amounts paid professional fundraisers exceeded 90% of HTV's revenues for the years 2013 and 2014;

- "Paulson paid nearly all the money raised for veterans to his overpriced fundraisers - \$1,160,062 in 2014 alone," **expressly** stating that the amount paid by HTV to professional fundraisers in 2014 was **\$1,160,062**, rather than the actual amount paid of **\$473,222**; and,
- "Paul Paulson's Shakedowns – The Truth is he Collects Money for Veterans & Puts it in his Own Pocket," again implying PAULSON puts all money collected for HTV into his own pocket.

12. The second mailer (copy attached) was also mailed to households within the city limits of Orlando, Florida, within Orange County, Florida, during the week of October 19, 2015.

13. On one side of the mailer, it states "Paul Paulson **Paid Himself** over \$100,000 From Money that was Supposed to Help Veterans," (emphasis supplied), again implying PAULSON had an **annual** salary of in excess of \$100,000 and that his salary was unilaterally **taken** or **stolen** by PAULSON, rather than duly authorized and approved by others.

14. The other side of the mailer, citing HTV's records for the years 2013 and 2014, states the following:

- "Fact: Over 90% of the money donated to his charities went to overpriced fundraisers and his personal salary," again **expressly** stating that over 90% of HTV's revenues went to either PAULSON's salary or professional fundraisers;

- “Paul Paulson **Took** Over \$100,000 in Salary From Money That Was Supposed to Help Veterans,” (emphasis supplied), again implying PAULSON had an **annual** salary of in excess of \$100,000 and that his salary was unilaterally **taken** or **stolen** by PAULSON, rather than authorized and approved by others;
- “There are few things worse than this – claiming that you are helping veterans when **over 90% of the money donated** to his charities went to over-priced fundraisers and his personal salary,” (emphasis supplied) again **expressly** stating that the combination of PAULSON’s salary and the amounts paid professional fundraisers exceeded 90% of HTV’s revenues for 2013 and 2014;
- “Paulson made sure he made money by even **paying himself** a salary of over \$100,000 out of the money that was supposed to go to veterans,” again, implying PAULSON had an **annual** salary of in excess of \$100,000 and that his salary was unilaterally **taken** or **stolen** by PAULSON, rather than authorized and approved by others; and,
- “Paul Paulson used their service to their country to line his pockets. What Paul Paulson did was shameful. And if it isn’t illegal, it should be,” again, implying that PAULSON’s salary was unilaterally **taken** or **stolen** by PAULSON, rather than authorized and approved by others.

15. During the week of October 26, 2015, Defendants, FDP, DYER and RICKE caused a third mailer (copy attached) to be delivered to households within the city limits of the City of Orlando, Florida, within Orange County, Florida.

16. On one side of the mailer, RICKE is shown holding a girl (implied to be his granddaughter) and is quoted as saying the following: “Paul Paulson spends over 90% of the money raised for his charity (implying HTV) on his own salary and his team instead of on vets. How could I tell my granddaughter I voted for someone like that?” Again, **expressly** stating that the combination of PAULSON’s salary and the amounts paid professional fundraisers exceeded 90% of HTV’s revenues for the years 2013 and 2014.

17. On the other side of the mailer, citing the years 2013 and 2014, the mailer makes the following statements as if they are RICKE speaking: -

- “Paulson Takes Advantage of Vets. Over 90% of the Money Goes to His Team & His Salary,” again **expressly** stating that the combination of PAULSON’s salary and the amounts paid professional fundraisers exceeded 90% of HTV’s revenues for the years 2013 and 2014;
- “What Paulson is Doing Takes Advantage of Veterans. Paulson is using our service to pay his salary. When over 90% of his charity’s money that is raised goes to his team and his own salary – that’s a sham and is taking advantage of our service to our country,” again **expressly** stating that the combination of PAULSON’s salary and the amounts paid professional fundraisers exceeded 90% of HTV’s revenues for the years 2013 and 2014;
- “I Can’t Tell My Granddaughter I Voted for Someone Like That. It is just wrong. If what Paulson is doing isn’t illegal, it should be. Asking people to give to veterans and then spending over 90% of the money

on his team and his own salary. I can't tell my granddaughter I voted for someone who did that. I just can't," again **expressly** stating that the combination of PAULSON's salary and the amounts paid professional fundraisers exceeded 90% of HTV's revenues for the years 2013 and 2014.

18. The above-cited and quoted statements from the three mailers are either **expressly** false or false by implication.
19. These false statements were knowingly and intentionally made by Defendants in order to harm both HTV and PAULSON.

Count I – Injunction against FDP and DYER

20. This is an action by Plaintiffs in equity against Defendants, FDP and DYER, to enjoin them from continuing to defame Plaintiffs.
21. Plaintiffs have no adequate remedy at law comparable to the relief sought herein.
22. All conditions precedent to the bringing of this action have occurred or been performed.
23. Plaintiffs re-allege and incorporate by reference herein the allegations in paragraphs 1 through 14, 18 and 19, above.
24. Defendants, FDP and DYER's campaign to defame and spread false statements about Plaintiffs, such as above, have damaged Plaintiffs' reputations. Additionally, it is anticipated that Defendants, FDP and DYER's campaign to defame and spread false statements about Plaintiffs, such as above, will reduce, if not totally stop, contributions to HTV.

25. If no injunction is entered herein, Plaintiffs' reputations will continue to be irreparably harmed.

26. It is in the public's interest to prevent the spreading of such false information by Defendants, FDP and DYER, regarding Plaintiffs.

WHEREFORE Plaintiffs pray that this Court will take jurisdiction herein and will enter a permanent injunction against Defendants, FDP and DYER, enjoining them from continuing to defame and spread false statements about Plaintiffs, such as above, as well as to award Plaintiffs their costs herein.

Count II – Injunction against FDP, DYER and RICKE

27. This is an action by Plaintiffs in equity against Defendants, FDP, DYER, and RICKE, to enjoin them from continuing to defame Plaintiffs.

28. Plaintiffs have no adequate remedy at law comparable to the relief sought herein.

29. All conditions precedent to the bringing of this action have occurred or been performed.

30. Plaintiffs re-allege and incorporate by reference herein the allegations in paragraphs 1 through 8 and 15 through 19, above.

31. Defendants, FDP, DYER and RICKE's campaign to defame and spread false statements about Plaintiffs, such as above, have damaged Plaintiffs' reputations. Additionally, it is anticipated that Defendants, FDP, DYER, and RICKE's campaign to defame and spread false statements about Plaintiffs, such as above, will reduce, if not totally stop, contributions to HTV.

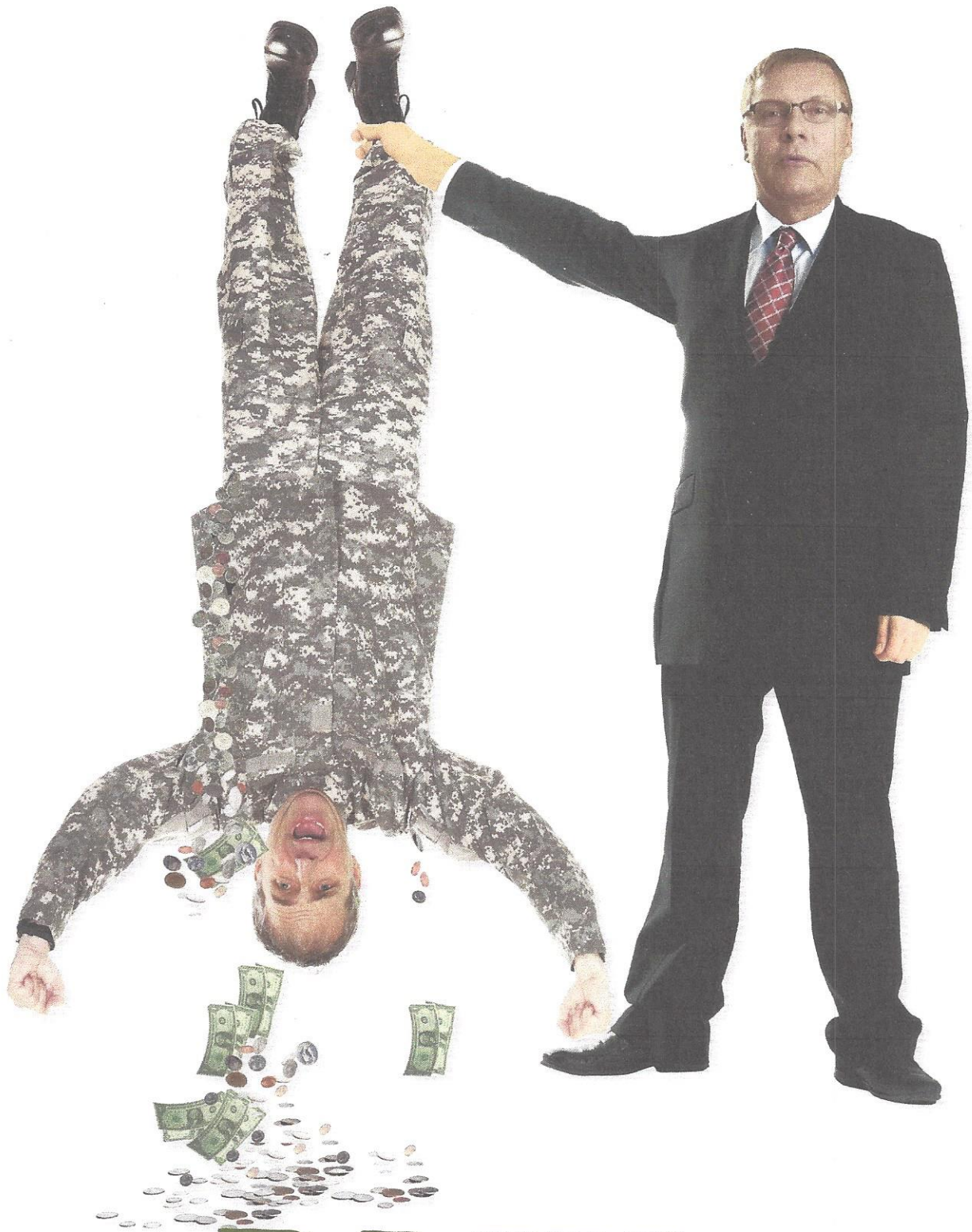
32. If no injunction is entered herein, Plaintiffs' reputations will continue to be irreparably harmed.

33. It is in the public's interest to prevent the spreading of such false information by Defendants, FDP, DYER and RICKE, regarding Plaintiffs

WHEREFORE Plaintiffs pray that this Court will take jurisdiction herein and will enter a permanent injunction against Defendants, FDP, DYER, and RICKE, enjoining them from continuing to defame and spread false statements about Plaintiffs, such as above, as well as to award Plaintiffs their costs herein.

Dated this 29 day of October, 2015.

/s/ Frederic B. O'Neal, Esq.
Frederic B. O'Neal, Esq.
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Windermere, FL 34786
Phone - (407) 719-6796
Fax - (407) 292-5368
Email - fredonealatlaw@aol.com



PAUL PAULSON

SHAKING DOWN VETERANS TO PAY HIS SALARY

The Florida Democratic Party
214 S. Bronough Street
Tallahassee, FL 32301

Check the Facts:

1. 2013 and 2014 Help the Vets, Inc. 990 Forms
2. 2014 Help the Vets, Inc. 990 Form

Paid electioneering communication paid for by the Florida Democratic Party, 214 South Bronough Street, Tallahassee, FL 32301. | FDP-BUD1521

PRESORT STD
NONPROFIT ORG
US POSTAGE
PAID
FLORIDA
DEMOCRATIC PARTY
32805



ECRL0T 0134A**C015 000007 C015 0004901
STACEY GUETZLOE
1808 ANTIGUA DR
ORLANDO FL 32806-1507



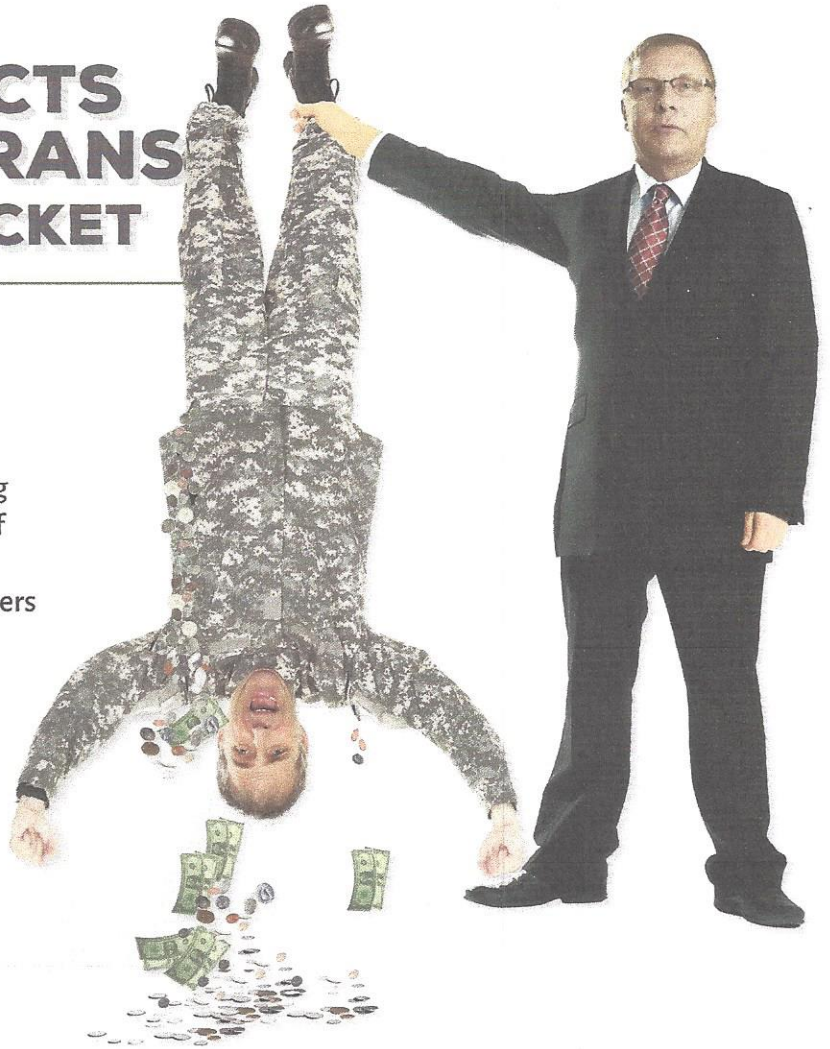
PAULSON COLLECTS MONEY FOR VETERANS & PUTS IT IN HIS POCKET

Paulson Took Over \$100,000 in Salary From Money That Was Supposed to Help Veterans

There is nothing more shameful than this – claiming that you are helping veterans when you pay yourself over \$100,000, and more than 90% of the money donated to his charities went to overpriced fundraisers and his personal salary.¹

Over 90% of the Funds Collected for Veterans Go to His Team and His Salary

Paulson paid nearly all the money raised for veterans to his overpriced fundraisers – \$1,160,062 in 2014 alone!²



PAUL PAULSON'S SHAKEDOWNS

THE TRUTH IS HE COLLECTS MONEY FOR VETERANS & PUTS IT IN HIS OWN POCKET.



**Paul Paulson Paid Himself
Over \$100,000 From Money¹ That
Was Supposed to Help Veterans.**

**Orlando
Sentinel**

“... filings for his veterans
charity, Help the Vets, Inc.,
raise ‘a number of red flags’ ...”
9/12/15





Check the Facts:

1. 2013 and 2014 Help the Vets, Inc. 990 Forms

Paid electioneering communication paid for by the Florida Democratic Party, 214 South Bronough Street, Tallahassee, FL 32301. | FDP-BUD1512

ECRLOT 0134A**C015 000007 C015 0004377
STACEY GUETZLOE
1808 ANTIGUA DR
ORLANDO FL 32806-1507

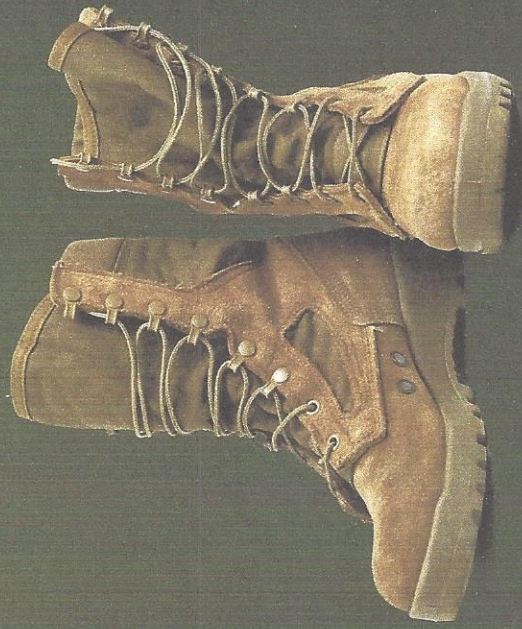
Fact: Over 90% of the money donated to his charities went to over-priced fundraisers and his personal salary.¹

Paul Paulson Took Over \$100,000 in Salary From Money That Was Supposed to Help Veterans¹

There are few things worse than this - claiming that you are helping veterans when over 90% of the money donated to his charities went to over-priced fundraisers and his personal salary.¹ Paulson made sure he made money by even paying himself a salary of over \$100,000 out of the money that was supposed to go to veterans.¹

Paul Paulson used their service to their country to line his pockets.

What Paul Paulson did was shameful. And if it isn't illegal, it should be.





Paul Paulson spends over 90% of the money raised for his charity on his own salary and his team instead of on vets.

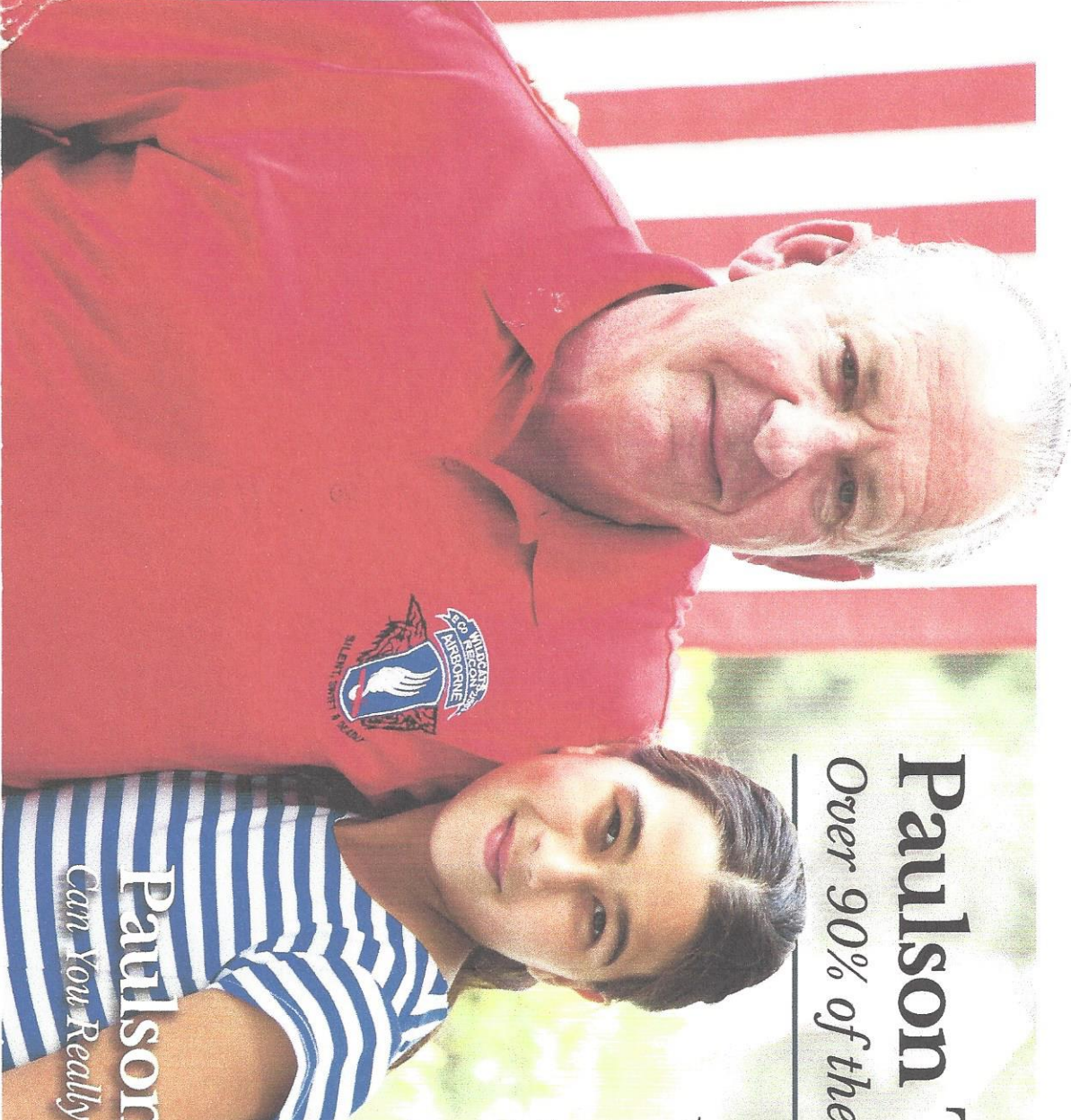
**How could
I tell my
granddaughter
I voted for
someone like
that?**

Clark Ricke
Grandfather, Retired U.S. Army

The Florida Democratic Party
214 S. Bronough Street
Tallahassee, FL 32301

Check the Facts:

. 2013 and 2014 Help the Vets, Inc. 990 Forms
. 2013 and 2014 Help the Vets, Inc. 990 Forms
d. pol. adv. paid for by the Florida Democratic Party, 214 South
ronough Street, Tallahassee, FL 32301. The Florida Democratic Party
ndorses Buddy Dyer for Orlando Mayor; Patty Sheehan for City Council,
istrict 4; and Samuel Ings for City Council, District 6. | FDP-BUD1523



Paulson Takes Advantage Over 90% of the Money Goes to His Team & H

ECRL0T 0134A**C015 000003 C015 0001575
STACEY GUETZLOE
1808 ANTIGUA DR
ORLANDO FL 32806-1507

What Paulson Is Doing Takes Advantage

Paulson is using our service to pay his salary. When over 90% of his che
to his team and his own salary¹ – that’s a sham and is taking advantage

I Can't Tell My Granddaughter I Voted for Someone Like That.

It is just wrong. If what Paulson is doing isn't illegal, it should be. Asking
then spending over 90% of the money on his team and his own salary.²
I voted for someone who did that. I just can't.

Paulson Takes Advantage of
Can You Really Tell Your Grandkids You Voted for Someone

Forms
Florida Democratic Party
by Sheehan for City Council,
District 6. | FDP-BUD1523



ECRL0T 0134A**C015 000003 C015 0001575

STACEY GUETZLOE
1808 ANTIGUA DR

ORLANDO FL 32806-1507

PRESORT STD
NONPROFIT ORG
US POSTAGE
PAID
FLORIDA
DEMOCRATIC PARTY
32805



Paulson Takes Advantage of Vets.

Over 90% of the Money Goes to His Team & His Salary.

What Paulson Is Doing Takes Advantage of Veterans.

Paulson is using our service to pay his salary. When over 90% of his charity's money that is raised goes to his team and his own salary¹ – that's a sham and is taking advantage of our service to our country.

I Can't Tell My Granddaughter I Voted for Someone Like That.

It is just wrong. If what Paulson is doing isn't illegal, it should be. Asking people to give to veterans and then spending over 90% of the money on his team and his own salary.² I can't tell my granddaughter I voted for someone who did that. I just can't.



Paulson Takes Advantage of Veterans.

Can You Really Tell Your Grandkids You Voted for Someone Who Does That?