

SUPREME COURT OF THE STATE OF NEW YORK    Index Number  
COUNTY OF NEW YORK

\_\_\_\_\_X  
JONATHAN REICH

Plaintiff

**SUMMONS**

-against-

CHARLES C. HALE, WARREN ST. JOHN, JESSICA  
L. SAWYER, DMEP CORPORATION D/B/A HALE  
GLOBAL, PLANCK, LLC D/B/A PATCH MEDIA,  
PATCH MEDIA CORPORATION

Defendants

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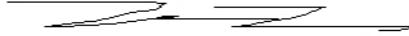
To the above-named Defendants:

YOU ARE HEREBY SUMMONED and required to serve upon Plaintiffs' attorney an answer to the Verified Complaint in this action within twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York). In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the Complaint.

The basis of the venue designated is Defendants offices in New York County, and CPLR §509.

Dated: New York, New York  
August 10, 2016

**THE WILDER LAW FIRM, PC**



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By: NICK WILDER  
*Attorney for Plaintiff*  
17 East 67 Street., Suite 4D  
New York, NY 10065  
(212) 951-0042

To:

Defendant DMEP Corporation, d/b/a Hale Global  
139 East 63d Street, 14th Floor  
New York, New York 10065

Defendant Charles Hale  
139 East 63d Street, 14th Floor  
New York, New York 10065

Defendant Planck, LLC, d/b/a Patch Media  
c/o Patch Media  
134 West 29th Street, 11th Floor  
New York, New York 10001

Defendant Warren St. John  
Patch Media  
134 West 29th Street, 11th Floor  
New York, New York 10001

Defendant Jessica L. Sawyer  
Patch Media  
134 West 29th Street, 11th Floor  
New York, New York 10001

Defendant Patch Media Corporation  
Patch Media  
134 West 29th Street, 11<sup>th</sup> Floor  
New York, New York, 10001.

\_\_\_\_\_  
JONATHAN REICH

Plaintiff

**COMPLAINT**

-against-

New York County is  
Designated as the Venue  
for Trial

CHARLES C. HALE, WARREN ST. JOHN, JESSICA  
L. SAWYER, DMEP CORPORATION D/B/A HALE  
GLOBAL, and PLANCK, LLC D/B/A PATCH  
MEDIA, PATCH MEDIA CORPORATION

Defendants

\_\_\_\_\_  
X

JONATHAN REICH, by and through his attorney NICK WILDER of THE  
WILDER LAW FIRM, as and for his complaint against CHARLES C. HALE,  
WARREN ST. JOHN, JESSICA L. SAWYER, DMEP CORPORATION D/B/A HALE  
GLOBAL, PLANCK, LLC D/B/A PATCH MEDIA, and PATCH MEDIA  
CORPORATION (collectively “Defendants”) alleges as follows:

**PARTIES**

1. Plaintiff Jonathan Reich is a natural person who at all relevant times and presently resides in Queens County, New York.
2. Defendant Charles C. Hale at all relevant times was President and CEO of DMEP Corporation d/b/a Hale Global, a parent corporation to Patch Media Corporation. Currently Charles C. Hale is Executive Chairman of Patch Media Corporation and a resident of New York County, New York. Defendant Hale is located at 139 East 63rd Street, 14th Floor, New York, New York 10065.

3. Defendant Warren St. John at all relevant times was Editor-In-Chief of Patch Media Corporation. Currently Warren St. John is CEO and Executive Editor at Patch Media Corporation and a resident of New York County, New York, with offices at 134 West 29th Street, New York, New York 10001.

4. Defendant Jessica L. Sawyer, at all relevant times was a local editor for Avon Patch, a subsidiary of Patch Media Corporation, a division with offices at 134 West 29th Street, New York, New York 10001.

5. DMEP Corporation d/b/a Hale Global, a parent corporation to Patch Media Corporation, at all relevant times was a corporation organized under the laws of the State of New York, with its principle place of business at 139 East 63rd Street, 14th Floor, New York, New York 10065.

6. Planck, LLC, a Delaware Limited Liability Company, d/b/a Patch Media, having an office and place of business c/o Patch Media, 134 West 29th Street, 11th Floor, New York, New York 10001.

7. Patch Media Corporation, and its Internet website [www.Patch.com](http://www.Patch.com), is a news media and information distribution platform owned by DMEP Corporation d/b/a Hale Global. Patch Media has offices at 134 West 29th Street, New York, New York 10001.

## **PRELIMINARY STATEMENT**

8. Plaintiff is an honest and law-abiding young man who had a promising future and was a college student with no criminal record. Plaintiff was accused of making threatening phone calls to individuals in the state of Connecticut. Plaintiff has never been convicted for making any type of phone calls. No evidence has ever been brought forth to the accused, his counsel, or to a court of law. Unfortunately showing great irresponsibility, Defendants made false and defamatory statements about Plaintiff.

9. Motivated by a desire to garner attention for their marginal publication Defendants made a mountain out of a molehill, turning a non-story into a sensational headline. As a result, Patch Media got national and international attention. This was done through journalistic irresponsibility, using Plaintiff to build defamatory sensational headlines. Defendant must be held accountable for the damages proximately caused to Plaintiff by its false and defamatory stories about him masquerading as journalism.

### **Factual Background**

10. Defendants wrote seven defamatory articles regarding Plaintiff published on [www.Patch.com](http://www.Patch.com). These particular stories were put into hateful discussion about the Plaintiff over the past three years over many social media platforms and the Internet. Defendant's articles include the following:

a. 5/20/2013- "Police: Man Made Threatening Phone Calls to Connecticut Official in Farmington Valley."

b. 5/22/2013- "Police: CT Chief Medical Examiner Received Threatening Calls Referencing Newtown Shooting Probe."

c. 5/23/2013 (Avon Patch)- "Police: Man Who Harassed Connecticut Officials Believed in Newtown Shooting Cover-Up."

d. 5/23/2013 (Farmington Patch)- “Police: Man Who Harassed Connecticut Officials Believed in Newtown Shooting Cover-Up.”

e. 5/24/2013- “Suspect Made Harassing Calls Prior to Newtown-Related Incidents, Police Say.”

f. 5/24/2013 (Newtown Patch)- “Police: CT Chief Medical Examiner Received Threatening Calls Referencing Newtown Shooting Probe.”

g. 12/26/2013- “Top Stories: Man Threatens State Officials Post-Sandy Hook.”

11. The 5/20/2013 article referred to Plaintiff by name repeatedly and included personal information including his family’s home address, his age, and Plaintiff’s booking photo. This detailed information was not verified via proper procedural legal identification.

12. The article published on 5/22/2013 claimed that Plaintiff made “threatening calls” to the Chief Medical Examiner, H. Wayne Carver II. This is false. No threats were ever made. This negligently and carelessly drafted and published article included alleged witnesses names, which were unauthorized for release, due to the pending case status. Next, after stating that a policeman had received threatening calls the article claims “it is not clear whether Reich is *also* responsible for those calls” (emphasis added). The use of the word “also” implies that IN FACT Mr. Reich was responsible for threatening calls to Dr. Carver. He was not responsible for threatening calls to Dr. Carver.

13. Defendants operate purely as a profit-pursuing business enterprise- NOT a serious journalistic endeavor. This lack of journalistic ethics is reflected and demonstrated in these stories. Patch is essentially an “infomercial”- whose primary objective is marketing, advertising, business, and profits.

14. The article published on 5/23/2014 stated: “Man Who Harassed Connecticut Official Believed in Newtown Shooting Cover-Up”. The article refers to this man as Jonathan Reich, the Plaintiff. This statement falsely claims as a factual matter that Mr. Reich “harassed” Dr. Carver. The article stated that Plaintiff had also contacted a police officer “for the purposes of harassment, regarding the Newtown incident.” This is a false statement. Mr. Reich never “harassed” anyone including any police officer.

15. Moreover the article stated “State Police Lt. J. Paul Vance is the other state official who received similar calls, police said in the arrest warrant application.” This demonstrates unlawful access to an internal police document, the arrest warrant application, by DMEP Corporation d/b/a Hale Global.

16. The article published on 5/23/2013 stated that “Police said that people setting up charitable organizations for victims of the Newtown incident also received harassing calls. The Avon Police Department stated that a Durham family that was receiving daily phone calls reported it to the Connecticut State Police Resident Trooper's Office.” Malicious intent is found when publishing witness names and details not authorized to be published according to Avon Police Department procedures, and through the controlled release of pre-written articles.

17. Critically, and outrageously, Defendants demonstrated malicious intent by excluding several supporting police affidavits, including Connecticut State Police (State of Connecticut Department of Emergency Services and Public Protection) Report No. 1200704559-00054069 which stated with Reference to Plaintiff **“there does not seem to be any violation of any sort”**.

18. The same article stated: “The suspect also called Carver's Farmington office at the UConn Health Center on Feb. 6 and told a secretary to tell Carver that ‘he has a problem and that he would keep calling’, police said. He told her he had ‘proof’ that Carver did not perform autopsies on the Newtown victims and that he was covering up the incident.” The particular incident referenced was investigated by the Connecticut State Police and in State of Connecticut Department of Emergency Services and Public Protection Report No. 1200704559-00054069, Investigator TFC Michael A. Downs (Badge No. 0502) who examined the case found **"there does not appear to be a violation of any sort."**

19. This same article stated “Reich himself is Jewish” releasing libelous and unverified information that was not eligible to be released to the public via press release. DMEP Corporation d/b/a Hale Global did not contact Plaintiff or his legal counsel for comment or to verify information before publication. The Article states “Jonathan Reich, 22, who was ‘radical’ in his Jewish beliefs, also harassed her and her roommates on a school trip to Israel.” This statement is false. First, there is nothing “radical” about Plaintiff. Moreover, Plaintiff has never participated on a school-sponsored trip to Israel, and he certainly never harassed anybody on any school-sponsored trip to Israel- which never occurred in the first place.

20. DMEP Corporation d/b/a Hale Global did not make contact with Plaintiff or Plaintiff’s counsel to verify information published. Articles published by Defendants are patently false and libelous on their face. The article falsely and with no basis, portrays Plaintiff as some form of religious nut.



21. The Article dated 12/26/2013, “Top Stories: Man Threatens State Officials Post- Sandy Hook” refers to the Plaintiff. The article states: “New Yorker Makes Threatening Calls to State Officials Post-Sandy Hook (May) Avon police arrested Jonathan Reich, of New York, after he reportedly made threatening phone calls to former chief medical examiner Dr. H. Wayne Carver II, of Avon, and State Police Lt. Paul Vance about the Sandy Hook school shooting investigation.”

22. These outrageous statements are patently false. Plaintiff never made any threats to anybody.

23. As hoped by Defendants, these sensational claims reported in their publication, resulted in widespread dissemination internationally, through news media outlets, social media platforms and organizations. Since publication, online and in-person entities have stalked and harassed the Plaintiff and Plaintiff's family.

24. Defendants published information in a series of articles, which subjected Plaintiff to be targeted by various members of the public. This information included Plaintiff's family home address and has led to threats of intimidation, stalking, and harassment of Plaintiff and Plaintiff's family.

25. As a result Plaintiff has suffered terrible harm to his reputation, economic prospects, damage to his career prospects, social stigmatization and ridicule, and painful emotional and physical distress and suffering.

26. On August 24, 2015, Plaintiff sent a complaint to the Patch editor and author of the series of articles, Jessica L. Sawyer, via certified mail and e-mail; however, as of the present time, the articles remain published and available to the public.

### **First Cause of Action (Libel per se)**

27. Paragraphs 1-26 are restated and incorporated as if set forth fully herein.
28. In order to garner attention for its flagging publication, Defendants made sensational claims that Plaintiff is a criminal. The articles repeatedly stated that Plaintiff had “threatened” Dr. Carver. This is false. Defendants repeatedly stated that Plaintiff made “harassing” phone calls to Dr. Carver. This is false. Defendants repeatedly stated that Plaintiff made “threatening” and “harassing” phone calls to a police officer and to families of the shooting victims. These statements are false. Defendants repeatedly stated that Plaintiff “harassed” a girl on a school-sponsored trip to Israel. Plaintiff never even went on a school-sponsored trip to Israel. Defendants described Plaintiff as a criminal. He isn’t. Defendants publication of false claims that Plaintiff is a criminal constitutes libel per se, for which they are liable.

### **Second Cause of Action (Defamation)**

29. Paragraphs 1-28 are restated and incorporated as if set forth fully herein.
30. The articles all specifically refer to Plaintiff by name, Jonathan Reich.
31. Defendants published statements which were patently false and harmful. The articles repeatedly stated that Plaintiff had “threatened” Dr. Carver. This is false. Defendants repeatedly stated that Plaintiff made “harassing” phone calls to Dr. Carver. This is false. Defendants repeatedly stated that Plaintiff made “threatening” and “harassing” phone calls to a police officer and to families of the shooting victims. These statements are false. Defendants repeatedly stated that Plaintiff “harassed” a girl on a school trip to Israel. Plaintiff never even went on a school trip to Israel. Defendants described Plaintiff as a criminal. He isn’t.

32. Defendants publication of false claims that Plaintiff was “harassing” and “threatening” all kinds of people were done with malicious intent, or at a minimum reckless negligence.

33. Defendants had no privilege permitting publication of such false statements.

34. Defendants proximately caused damage to Plaintiff through its publication of false claims that Plaintiff was “harassing” and “threatening” all kinds of people.

35. Anybody who ever Googles or inputs Plaintiff’s name into any Internet search engine will be met with these irresponsible stories. These are inherently damaging statements, and have caused Plaintiff to suffer loss of economic opportunities, scorn, derision, hatred, harassment, difficulty finding employment, deep emotional pain, and even resulted in physical harm. They have interfered with this young man’s education and career prospects and his entire life.

**Third Cause of Action (Injunctive Relief)**

36. Paragraphs 1-35 are restated and incorporated as if set forth fully herein.

37. Defendants willful and malicious defamatory statements about the Plaintiff constitute libel per se for which they are answerable for damages under New York State law.

38. Defendants must immediately remove such statements from all websites under their control and issue appropriate retraction articles on all Patch website pages under their control and any distribution that would have been affected by their actions,

Defendants must be enjoined from continuing to issue libelous and defamatory statements about the Plaintiff.

**Fourth Cause of Action (Inciting Religious Discrimination)\**

39. Paragraphs 1-38 are restated and incorporated as if set forth fully herein

40. Pursuant to Article 15 of New York's Executive Law (New York's "Human Right's Law"), Defendants have aided and abetted religious discrimination against Plaintiff.

41. The above-mentioned articles dated May 23, 2013 and May 24, 2013 provoke hatred and religious discrimination from the public against the Plaintiff. After describing him as "harassing" and "threatening" Defendants state "Reich himself is Jewish."

42. The articles state "Woman tells police that suspect Jonathan Reich, 22, who was 'radical' in his Jewish beliefs, also harassed her and her roommates on a school trip to Israel." Plaintiff has never attended a "school-sponsored trip to Israel". Defendants exhibiting great bigotry portrayed Plaintiff as a religious nut and provoked anti-Semitism.

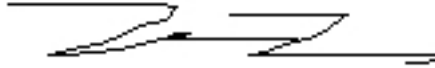
43. As a result Plaintiff and his family members have been targeted at the home address published by the Defendants and on online websites and social media platforms, with the intent to intimidate, threaten, trespass on private property, and express anti-Semitism.

44. The statements contained within the news articles have subjected Plaintiff to “trial-by-media” and exposed Plaintiff to civil rights violations and discriminatory treatment within the Hartford Judicial System by State Employees, targeting Plaintiff for over three (3) years. Defendants impeded Plaintiff's right to a fair jury trial by swaying the public's opinion of Plaintiff before arraignment, revealing alleged witness names, and carelessly endangering and revealing alleged witnesses.

45. As a direct and proximate result of the above-described publications, authored and disseminated nationally and internationally by the Defendants, Plaintiff has suffered injury to his reputation, reputation of family members, serious mental anguish, severe and substantial emotional distress, economic hardship, loss of religious freedom, emotional pain and suffering, damage to his physical health, medical costs, deprivation of civil rights, and loss of the capacity for the enjoyment of life.

WHEREFORE, Plaintiff Jonathan Reich, demands Defendants be enjoined from any further defamatory conduct, and judgment for full monetary damages against Defendants Charles C. Hale, Warren St. John, Jessica L. Sawyer, and DMEP Corporation d/b/a Hale Global, jointly and severally liable, plus legal costs, pre-judgment interest, and post-judgment interest, and such other and further relief as is just, equitable, and proper.

DATED: New York, New York  
August 10, 2016



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