

RETURN DATE: MARCH 21, 2023 : **SUPERIOR COURT**
P2B NEW HAVEN, LLC
DBA THE PLACE TO BE : **J.D. OF NEW HAVEN**
VS. : **AT NEW HAVEN**
SIMONE HAZARD : **FEBRUARY 16, 2023**

COMPLAINT

1. The Plaintiff, P2B NEW HAVEN, LLC DBA “The Place to Be” (hereinafter referred to as “Plaintiff”) is a restaurant located in New Haven, Connecticut.

2. The Defendant, Simone Hazard, was a former employee of Plaintiff’s restaurant, “The Place to Be”.

3. On or about January 20, 2023, Defendant posted on her Facebook social media account the following message: “Where’s my paycheck? It’s been 3 weeks? Clearly this establishment has to keep getting embarrassed online. I can either go in there and put on a show, I can gather everyone up from all locations and create a class action lawsuit, use my Instagram to make sure no one steps foot in that evil work environment, or you can pay people their money. Figure it out.”

4. Subsequent to the aforementioned post, Defendant posted a new statement on her Facebook page that read: Edit* “I was given my check last night along with a cease and desist letter. There are still employees that quit weeks ago still unpaid. In the state of CT when someone quits, the establishment has to pay the by next pay day. When fired, they have

to LEGALLY pay the next day. They don't follow the law. They also have people working there without verifying personal documentation.

5. In addition, on or about January 20, 2023, Defendant again posted the following message on her Facebook page: "The staff is under a lot of pressure which is why they already have a huge turnover rate. The managers are abusive to employees. It's like a sweatshop."

6. In addition, on or about January 20, 2023, Defendant again posted the following message on her Facebook page: ".....So they want to go this route when we have evidence of all of the illegal things going on there...."

7. Defendant's statements as alleged above were false, defamatory and malicious and tend to place the Plaintiff in a negative light.

8. Defendant's statements as alleged above have in fact caused damages to the Plaintiff.

FIRST COUNT – (DEFAMATION)

1-8. Paragraph 1-8 are hereby incorporated into Paragraphs 1-8 of this First Count, as if fully set forth herein.

9. The Defendant engaged in defamation of the Plaintiff, all to the Plaintiff's loss and damage.

SECOND COUNT – (LIBEL PER SE)

1-8. Paragraph 1-8 are hereby incorporated into Paragraphs 1-8 of this Second Count, as if fully set forth herein.

9. The Defendant engaged in libel per se as to the Plaintiff, in that the Defendant's false, defamatory and malicious statements accuse the Plaintiff of committing illegal acts, all to the Plaintiff's loss and damage.

WHEREFORE, as to the First Count and Second Count, Plaintiff claims:

1. Monetary damages;
2. Attorney's fees;
3. Punitive damages;
4. Costs; and
5. Such other and further relief as the Court may determine as proper.

THE PLAINTIFF,
P2B NEW HAVEN, LLC
DBA THE PLACE TO BE

By: 


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STATEMENT OF AMOUNT IN DEMAND

Money damages are sought in which the amount, legal interest or property in demand is more than FIFTEEN THOUSAND DOLLARS (\$15,000.00), exclusive of interest and costs.

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